



SPECIAL MEETING

Dear Sir/Madam,

You are summoned to attend a special meeting of the Borough Council of Newcastle-under-Lyme to be held in the **Queen Elizabeth II & Astley Rooms - Castle House, Barracks Road, Newcastle, Staffs. ST5 1BL** on **Wednesday, 19th November, 2025** commencing after the close of business of the Extraordinary Council Meeting.

B U S I N E S S

1 APOLOGIES

2 DECLARATIONS OF INTEREST

To receive declarations of interest from Members on items contained within this agenda.

3 MINUTES OF A PREVIOUS MEETING (Pages 5 - 14)

To consider the Minutes of the previous meeting(s)

4 MAYOR'S ANNOUNCEMENTS

5 LOCAL GOVERNMENT REORGANISATION (Pages 15 - 302)

6 LICENSING ACT POLICY (Pages 303 - 352)

7 MOTIONS OF MEMBERS (Pages 353 - 354)

A Motion has been received regarding the Civic Pride Campaign.

8 REPORTS OF THE REPRESENTATIVES ON OUTSIDE BODIES (Pages 355 - 384)

9 QUESTIONS TO THE MAYOR, CABINET MEMBERS AND COMMITTEE CHAIRS (Pages 385 - 386)

10 RECEIPT OF PETITIONS

To receive from Members any petitions which they wish to present to the Council.

11 URGENT BUSINESS

To consider any communications which pursuant to Section B4, Rule 9 of the constitution are, in the opinion of the Mayor, of an urgent nature and to pass thereon such resolutions as may be deemed necessary.

12 DISCLOSURE OF EXEMPT INFORMATION

To resolve that the public be excluded from the meeting during consideration of the following report(s) as it is likely that there will be disclosure of exempt information as defined in paragraphs contained within Part 1 of Schedule 12A (as amended) of the Local Government Act 1972.

Yours faithfully

A handwritten signature in black ink, appearing to read 'G. L. M.', with a horizontal line extending from the end.

Chief Executive

NOTICE FOR COUNCILLORS

1. Fire/Bomb Alerts

In the event of the fire alarm sounding, leave the building immediately, following the fire exit signs.

Fire exits are to be found at the side of the room leading into Queens Gardens.

On exiting the building Members, Officers and the Public must assemble at the statue of Queen Victoria. DO NOT re-enter the building until advised to by the Controlling Officer.

2. Mobile Phones

Please switch off all mobile phones before entering the Council Chamber.

3. Notice of Motion

A Notice of Motion other than those listed in Procedure Rule 14 must reach the Chief Executive ten clear days before the relevant Meeting of the Council. Further information on Notices of Motion can be found in Section B5, Rule 4 of the Constitution of the Council.

Officers will be in attendance prior to the meeting for informal discussions on agenda items.

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COUNCIL

Wednesday, 24th September, 2025

Time of Commencement: 7.00 pm

[View the agenda here](#)

[Watch the meeting here](#)

Present: Mayor - Councillor Robert Bettley-Smith (Chair)

Councillors:	Adcock	Gorton	Richards
	Allport	Grocott	Sweeney
	Barker MBE	Heesom	J Tagg
	Beeston	Holland	S Tagg (Leader)
	Berrisford	Hutchison	Turnock
	Brown	Johnson	Whieldon
	Casey-Hulme	S Jones	Whitmore
	Crisp	D Jones	Wilkes
	Dean	Lawley	G Williams
	Dymond	Northcott	J Williams
	Edgington-Plunkett	Parker	
	Fear	Reece	

Apologies: Councillor(s) Bryan, Burnett-Faulkner, Fox-Hewitt, Lewis, Skelding, Stubbs, J Waring, P Waring and Wright

Officers:	Gordon Mole	Chief Executive
	Simon McEneny	Deputy Chief Executive
	Anthony Harold	Service Director - Legal & Governance / Monitoring Officer
	Sarah Wilkes	Service Director - Finance / S151 Officer
	Craig Jordan	Service Director - Planning
	Roger Tait	Service Director - Neighbourhood Delivery
	Geoff Durham	Civic & Member Support Officer
	Craig Turner	Finance Manager / Deputy S151 Officer

1. **ALDERMAN JOSEPH 'HARRY' MATTHEWS**

A minute's silence was held for Alderman Joseph 'Harry' Matthews who had passed away earlier this week.

The Leader of the Council, Councillor Simon Tagg led the tributes to Harry who had served as Councillor, Deputy Leader of the Council and Mayor.

Although the Leader had not served alongside Harry on the Council, he had met him many times and had served alongside Harry's son Ian. On behalf of himself and his group, the Leader sent condolences to his family.

Councillor John Williams echoed the Leader's words and stated that Harry's door was always open to give advice and he treaded members from all groups in a friendly and courteous manner.

[Watch the tributes here](#)

2. DECLARATIONS OF INTEREST

There were no declarations of interest stated.

3. MINUTES OF A PREVIOUS MEETING

Resolved: That the minutes of the meeting held on 23 July, 2025 be agreed as a correct record.

4. MAYOR'S ANNOUNCEMENTS

The Mayor made three announcements:

The 'Music under the Stars' charity event, this coming Friday had been cancelled and would be replaced by another event in May, 2026.

The Mayoral walk, scheduled for Tuesday 30 September had been moved to Sunday 5 October.

The remaining walks would then follow on Sunday 12 October; Saturday 25 October and Sunday 8 November which requires booking would end at the Brompton Museum with 'cream tea and fizz'.

5. APPOINTMENT OF SECTION 151 OFFICER

Craig Turner left the room during consideration of this item.

The Leader introduced a report seeking Council's formal agreement to the appointment of the Service Director for Finance and Section 151 Officer following the current postholder, Sarah Wilkes leaving the Authority in mid-October. The Leader advised Council of Craig Turner's previous experience.

Sarah was thanked for her work over many years and wished all the best for the future. This would be her last meeting before taking on her new role with the Police, Fire and Crime Commissioner's office.

Following Council's approval of appointment, Mr Turner returned to the room and was congratulated.

Resolved:

- (i) That the appointment of Craig Turner as the Council's Service Director for Finance and Section 151 Officer be approved.
- (ii) That Mr Turner be appointed on a salary of £63,510.68 per annum with an additional £10,000 per annum Statutory Officer allowance.

[Watch the debate here](#)

6. ANNUAL REPORT

The Leader introduced a report on the Council's Annual Report for 2024-25 which provided a summary of work and outcomes achieved during the first year of the Council's 2022-2026 Council Plan. A copy of the Annual report was appended to the report.

The Leader outlined some of the achievements of the past year which included the momentum on the regeneration of the Borough; maintaining a balanced budget and delivering high quality services; the opening of Keele in Town. In Kidsgrove, plans were underway for the town centre and railway station developments.

Councillor Sweeney stated that, in reference to the balanced budget it had been achieved by feasible and sustainable savings through the Efficiency Board process. Savings and Funding strategies had enabled continued investment via the Civic Growth Fund. The One Council Programme had made recurrent savings of £1.173m year after year.

Members discussed and complimented upon the Annual Report.

Resolved: That the Council's Annual Report for 2024-2025 be received.

[Watch the debate here](#)

7. TREASURY MANAGEMENT ANNUAL REPORT 2024/25

The Portfolio Holder for Finance, Town Centres and Growth introduced the Treasury Management Annual Report for 2024/25, which had been produced in line with legislative requirements.

As of 31 March, 2025 no external borrowing had been undertaken by the Council.

The Leader stated that national policy governed the way in which the Council managed its money when using it, for example, to raise interest. Factors such as the economy and interest rates would have an impact and the economy needed to grow to benefit authorities both locally and nationally.

Resolved: (i) That the Treasury Management Annual Report for 2024/25 be noted.

[Watch the debate here](#)

8. URGENT DECISION NOTIFICATION - COMMITTEE PROPORTIONALITY

The Leader introduced a report asking Members to note a decision made by the Council's Chief Executive to re-allocate seats on committees following Councillor Beeston joining the Conservative Group.

Resolved: That the Urgent Decision notification be received.

[Watch the debate here](#)

9. STATEMENT OF THE LEADER OF THE COUNCIL

The Leader, Councillor Simon Tagg presented the statement that had been circulated about the activities and decisions made by Cabinet to allow questions and comments.

Questions were raised and responses were provided as follows.

On paragraph 2 – Walleys Quarry Odour Issues

Councillor Adcock asked the Leader if he agreed that it was concerning that there was still no timetable for a public inquiry which was one of the key recommendations coming from the Inquiry held here at Newcastle last year but were still awaiting a response. Did the Leader also agree that it was regrettable that there had been no clear response from the Government.

The Leader agreed, stating that since publication of the agenda, a response had been received from the new Secretary of State but unfortunately she did not wish to consent to a public inquiry. A copy of the letter would be sent to Members.

There had been a significant reduction in complaints regarding odours from the site through the effective works and management of the contractors brought in by the Environment Agency (EA) and the Council continued to press for the permanent capping and restoration of the site and opposed any reopening of the site. The government, EA and local MP would continue to be pressed for a public inquiry.

On paragraph 3 – Medium Term Financial Strategy 2026-27 to 2030-31

Councillor Berrisford welcomed the Council's commitment to prudent financial planning and the focus on maintaining a balanced budget. The Portfolio Holder for Finance, Town Centres and Growth was asked what contingency plans were in place within the MTFS to mitigate potential funding shortfalls, given the uncertainty around future government financial settlements.

The Portfolio Holder stated that the MTFS had been developed with a strong emphasis on resilience and adaptability, recognising the ongoing uncertainty around future government financial settlements. To mitigate financial shortfalls, the Council had embedded a number of contingency measures including maintaining a prudent level of reserves, regularly reviewing service efficiencies and scenario planning to model different funding outcomes. Opportunities were also being explored to diversify income streams via the commercial strategy.

The Council continues to lobby central government for fair and sustainable funding.

On paragraph 4 – Kidsgrove Town Deal Update and Contract Awards

Councillor Holland was pleased with the progress made on the Town Deal. The Leader or Portfolio Holder for Finance, Town Centres and Growth were asked how many job opportunities were forecast with the development at Chatterley Valley West.

The Portfolio Holder stated that he went to the site recently and the progress on the development was substantial. In previous discussions of the development, the portfolio holder had mentioned the creation of 1800 jobs. However, information was now being received from the County Council that it could be more than 1800.

On paragraph 5 – Newcastle -under-Lyme Borough Local Plan 2020-40

Councillor John Williams asked, when the Inspector talked about parking within the town centre, did she take into account the sale of car parks by the Council. There was a problem to the East of the town centre, particularly Hassell Street where the under provision of car parking was causing great concerns to residents and local businesses. Would the sale of car parks make the situation worse, especially with the development of the former Zanzibar site and the former Jolly Potters pub.

The Leader stated that the Council was aware of the issues in Hassell Street and some proposals had already been amended relating to Hassell Street car park to enable more spaces for businesses and residents. There had been a long running issue with parking spaces within the town centre. The sites being brought forward, which were in the Cabinet report, were ones that were rarely, if ever used for parking.

Councillor Turnock asked the Portfolio Holder for Strategic Planning for confirmation that the new local plan guaranteed a five year housing land supply so that further speculative development could be resisted.

The Portfolio Holder stated that, if an authority did not have a five year housing supply, there would be very little protection and at the current time, Newcastle did not have a five year housing land supply, however, this would hopefully change once the local plan had finished its examination period. Newcastle's timely movement with the plan meant that it would be examined under an older system and therefore fewer houses were required. If a land supply can be demonstrated then site outside of the allocated areas could be resisted. However, the government could change the goalposts in the future and that was outside of the Council's control.

Councillor Crisp stated that getting the local plan in place was the best short term protection for green spaces as it enabled sustainable housing developments. However, it was now known that the government wanted to impose an additional two thousand homes on the Borough. The Portfolio Holder for Strategic Planning was asked to outline how the neighbourhood plan would protect green spaces from the government's stated policy of build, build, build.

Councillor Northcott joined the meeting at 19:55

The Portfolio Holder stated that, if it was adopted it would become part of the Council's Strategic Development Plan which would carry weight along with the local plan and minerals plan. Paragraph 30 of the National Planning Policy Framework (NPPF) stated that "neighbourhood plans should not provide less development than set out in strategic policies for the area or undermine those strategic policies" – the strategic policies were set out in the local plan. Note 17 of paragraph 30 stated that "neighbourhood plans must be in general conformity with the strategic policies contained within any development plan which covered their area". The neighbourhood plan was therefore a supplement to the local plan but for issues such as defending green spaces, it was the local plan that had to be referred to.

On paragraph 6 – Forced Local Government Reorganisation (FLGR) Update

Councillor Dave Jones asked the Leader if he could provide details of any conversations or agreements that had been discussed with other authorities.

The Leader stated that he had met with the Leaders Board and had individual meetings with a number of leaders and also outside of Staffordshire including

Shropshire, Telford and through the Local Government Association (LGA). Some council's proposals were still awaited, particularly in the south. The Leader had spoken with the leader of Staffordshire County Council regarding their proposals for creation of West and East Staffordshire Authorities, the West being one of the proposals that Newcastle was investigating.

Councillor Adcock asked the Portfolio Holder for Finance Town Centres and Growth what immediate financial implications this process had had on the Council so far, including diversion of time of officer resources that could otherwise be focussed on delivering services.

The Portfolio Holder stated that the FLGR would not save money, nor would it be more democratic or improve services. The Council had £200k in this year's budget to pay for consultants and senior officer's time. A further £400k had been allocated in next year's budget to pay for other costs that would arise. The Portfolio Holder stated that the £600k would be better spend in the Borough for the people of Newcastle.

Councillor John Williams stated that he would like to see the Council look at the opportunities on behalf of its residents. He would like to see the Borough being independent. All opportunities should be looked at. The Leader was asked if he wanted a North Staffordshire Authority or an East and West Authority.

The Leader stated that this Council had made its view known agreeing that the preferred proposal was for a Newcastle Unitary and had put forward other ideas for investigation. There would be a Special Council meeting on 19 November when this Council's final proposals would be brought forward. The proposal would protect the Borough's history, protect the finances of the Borough and protect front line services.

The Leader stated that 8,700 people had signed the petition to 'Save Our Borough'. Newcastle MP's need to listen and stand up for the Borough.

Councillor Wilkes asked, if Newcastle did get taken over, would the local plan still stand.

The Leader stated that once the local plan was in place it would take the Council through to any new authority. However, a new local plan would then have to be prepared.

On paragraph 7 – Finance and Performance Review Report – First Quarter 2025-26

Councillor Beeston commended the Council's commitment to public health and safety, particularly food hygiene. The latest performance report stated that 0.41% of premises in the Borough were rated 0 or 1 out of 5. The Portfolio Holder for Sustainable Environment was asked what percentage of premises were rated 4 or 5 stars.

The Portfolio Holder stated that 980 premises were inspected across the Borough. Of those, 892 premises were rated 5 (very good) and 59 premises were rated 4 (good). Therefore 951 premises, or 97% had a 4 or 5 rating.

Councillor Whieldon stated that it was important to recognise outstanding performance of the Council's recycling and waste team. The percentage of successful collections stood at 99.97%.

The Portfolio Holder was asked to pass on Councillor Whieldon's congratulations to the team for their continued professionalism and dedication. The Portfolio Holder was also asked how current performance compared to previous quarters and if there were any further plans to build upon the Council's recycling services.

Councillor Dave Jones left the meeting at 20:17

The Portfolio Holder stated that he would pass Councillor Whieldon's comments to the team. The 99.97% collection success rate meant that for every 10,000 collections only three were missed. In the previous financial year, the figures finished on 99.95% successful collections. Newcastle was still the only council in the county that separately collected food waste from households and had now started collecting it from flats ahead of the 2026 deadline. In addition, more plastics were now being collected.

Councillor Parker echoed Councillor Whieldon's comments and also wished to thank officers, the Leader and the Cabinet for maintaining the strong performance of council services. Given that the County Council's new Reform Leadership had recently approved £140,000 for political assistant posts to advise their group, did the Leader share Councillor Parker's concerns that this displayed a lack of experience or capability within their new Cabinet to effectively run the County Council.

The Leader stated that he had been astounded to see that the County Council were looking to employ two political assistants, one of which would be for the Conservative group. However, the Conservative group would not be taking up the offer. The decision had been called-in for debate at the County and the Leader, as a County Councillor would be supporting the call-in to reverse that decision.

Resolved: That the statement of the Leader of the Council be received and noted.

[Watch the debate here](#)

10. **REPORTS OF THE CHAIRS OF THE SCRUTINY COMMITTEES**

Reports for the Economy and Place Scrutiny Committee, the Health Wellbeing and Environment Scrutiny Committee and the Finance, Assets and Performance Scrutiny Committee were attached to the agenda.

Resolved: That the reports be received.

[Watch the debate here](#)

11. **REPORTS OF THE CHAIRS OF THE REGULATORY COMMITTEES**

Reports for the Planning Committee and the Licensing and Public Protection Committee were attached to the agenda.

Members were advised that the Audit and Standards Committee had not met since the last meeting of the Full Council.

Resolved: That the reports be received.

[Watch the debate here](#)

12. MOTIONS OF MEMBERS

A Motion, concerning inappropriate accommodation for Asylum Seekers in Newcastle-under-Lyme was submitted by the Conservative Group, proposed by Councillor Holland and seconded by Councillor Fear.

Councillor Holland introduced the Motion which expressed concerns regarding the unsuitability of housing Asylum seekers in Houses of Multiple Occupation (HMO's) or short term lets as they often lacked the necessary support infrastructure.

Since publication of the agenda, in respect of resolution 6, a response had been received from Adam Jogee MP which had been circulated this evening.

Councillor Fear seconded the Motion and reserved the right to speak in the debate.

Following a lengthy debate, the Leader in summing up stated that the Motion addressed growing concerns, both locally and nationally for the placement of Asylum Seekers in appropriate accommodation. It was about standing up for residents and those seeking refuge by demanding that the system worked.

A vote was taken and the Motion was carried.

[Watch the debate here](#)

13. QUESTIONS TO THE MAYOR, CABINET MEMBERS AND COMMITTEE CHAIRS

Question from Councillor Jacqueline Brown to the Portfolio Holder for Sustainable Environment:

"In the summer of 2023 I contacted officers as a result of residents' complaints regarding bins left out all week in narrow terraced areas. This anti social behaviour causes obstruction and hazards to anyone using the pavement, particularly wheelchair users and those pushing prams & pushchairs. It also makes the area look very untidy.

Around this time The Sentinel ran an article about the City of Stoke-on-Trent issuing fixed penalty notices to habitual offenders. Officers informed me they were setting up a similar scheme and I was asked to identify hot spots, which I did including Kinsey St, West Street and George Street. Fellow councillors inform me this is a problem in other wards.

However, to my knowledge no fixed penalty notices have yet been issued. Could the portfolio holder give us an update please?"

The Portfolio Holder stated that a procedure had been approved in August 2023. This was a staged approach to enforcement as follows: Education. Letters and fliers were sent to the hotspot areas. There then followed a three staged approach: A warning letter sent to properties where issues had continued; this would be followed up by a community protection warning which outlined what was expected of the householder; finally, a community protection notice would be issued identifying the expectations and requirements that the owner/occupier needed to follow and asked them to comply with the notice. Failure to comply would result in a £100 Fixed Penalty Notice. Since approval of the scheme, the Neighbourhood Delivery team had carried out extensive work in a number of Wards.

Officers visited Kinsey Street, George Street and Church Street in Silverdale delivering letters and knocking on doors giving advice. A small number of bins were abandoned and subsequently uplifted. One resident in Kinsey Street did receive a fine.

Ward members were urged to encourage residents to report such issues so that they could be actioned.

Councillor Brown asked a supplementary question:

“Just to confirm, did you say that one resident was fined on Kinsey Street”

The Portfolio Holder confirmed this.

Question from Councillor Andrew Parker to the Leader of the Council:

“Deakins Yard (formerly the Sky Building) has been in the news again recently, following the Health & Safety Executive’s decision to block the opening of the student flats due to safety concerns. Can the Leader of the Council provide an update on any further developments?”

The Labour MP for Newcastle, in media interviews, stated that he wants answers as to why this student flats development was granted permission. Does the Leader agree with me that he should be looking closer to home to find those answers?”

The Leader stated that Building Control Officers dealing with the Newcastle area raised the alarm in December, 2024 identifying potential risks and alerted the Building Safety Regulator and their evidence prevented occupation of the building. From that point, the Council worked closely with the Staffordshire Fire and Rescue Service and ensured that action was taken by keeping up the pressure. In August this year, the Chief Executive of the Council activated an incident response approach to mitigate the immediate risk. A major focus was rehousing students and ensuring that they were placed in appropriate accommodation.

Council staff engaged directly with developers and stakeholders to resolve the situation. The developers agreed to cooperate with the Building Safety Regulator and the Council had agreed to meet regularly with the regulator to ensure that there would be no long term impact for residents in the wider community.

Adam Jogee MP was given a full briefing by the Building Safety Regulator, (part of the Health and Safety Executive) and officers, before being interviewed on BBC Radio Stoke. The MP had asked why permission had been given for this development. The sale, permission and question regarding due diligence therefore lay with the previous administration of the Council.

Councillor Parker did not ask a supplementary question:

[Watch the debate here](#)

14. RECEIPT OF PETITIONS

No petitions were handed in.

15. URGENT BUSINESS

There was no urgent business.

16. DISCLOSURE OF EXEMPT INFORMATION

There were no confidential reports.

**Mayor - Councillor Robert Bettley-Smith
Chair**

Meeting concluded at 9.11 pm

NEWCASTLE-UNDER-LYME BOROUGH COUNCIL

LEADER'S REPORT TO COUNCIL

19th November 2025

Report Title: Local Government Reorganisation and Devolution Update

Submitted by: Leader of the Council

Portfolios: One Council, People and Partnerships

Ward(s) affected: All Wards

<u>Purpose of the Report</u>	<u>Key Decision</u>	Yes ☒	No ☐
To seek the endorsement and support of full Council for actions to enable the submission of a proposal to UK Government setting out a model for the invitation area of Staffordshire and Stoke-on-Trent.			
<u>Recommendation</u> That Council: - Notes the work undertaken in the preparation of a final Local Government Reorganisation submission to UK Government from Newcastle-under-Lyme Borough Council; and - Endorses the case for a single unitary council for Newcastle-under-Lyme within the current Borough boundaries,			
<u>Reasons</u> This report outlines the work undertaken by the Council in developing options for a final submission to UK Government on forced local government reorganisation, following the release of the English Devolution White Paper in December 2024 and subsequent invitations to submit proposals by the Local Government and English Devolution Minister in January 2025 (with further feedback on interim plans in June 2025).			

1. Background

- 1.1 Following the release of its English Devolution White Paper on 16th December 2024, Government has expressed its intention to seek devolution settlements in every part of the United Kingdom, with the creation of new governance arrangements at revised population sizes.
- 1.2 Councils across England have been engaged in the process of Local Government Reorganisation (LGR) since December 2024. The Government's devolution agenda aims to create a new network of strategic authorities for the whole of England by 2029. LGR is stated as a required precursor to devolution in some areas, including

Staffordshire and Stoke-on-Trent, replacing two-tier county and borough/district councils and small unitary authorities with much larger unitary councils, which will be grouped into Strategic Authority areas.

- 1.3** Councils have been invited by Government to make final submissions by 28th November 2025, following feedback from the Minister for Local Government & English Devolution (at the time) in June 2025. This collective feedback on interim plans was issued to all Staffordshire and Stoke-on-Trent authorities, and did not rule in or out any proposals.
- 1.4** In September 2024, prior to the release of the White Paper and at the Government's request, the Staffordshire Leaders Board submitted its collective devolution plan to Government. This covered key themes:
 - 1.4.1** Devolution must work for all: plans must reflect and respond to a deep understanding of local needs and opportunities. That is what our authorities have been working hard at over the summer.
 - 1.4.2** Form must follow function: if we are to accept another layer of governance in the county, at additional cost to the people of Staffordshire and Stoke-on-Trent, then the prize in terms of devolved functions, powers and resources has to be significant.
 - 1.4.3** Governance has to be inclusive: current governance arrangements across our region work because all local authorities get to participate and contribute, and we want to ensure that this is also the case in any devolved arrangements.
 - 1.4.4** Commitment to subsidiarity: devolution should be to the most appropriate level of governance for the function in any question, and that should mean a combination of county-wide, local authority level and, perhaps most importantly, community level. We seek a devolution deal that gives us flexibility to make those judgements together.

2. Issues

- 2.1** In devising and investigating options which have the ability to be compliant with the criteria set out in the English Devolution White Paper, the Council nevertheless strong remains of the view that residents, businesses and visitors to the borough are better served by a locally accountable, locally focused authority. The two-tier system of local authorities works for Newcastle and remains in its citizens' best interest. Over recent decades, Newcastle has actively opted to remain its own entity, in charge of its own destiny. There is a strong risk that if the preferred option is not adopted, this will cease to be the case.
- 2.2** On 16th December 2024, the Government published its English Devolution White Paper. This set out both a desire to see local authorities work collaboratively, as had been extensively trailed by Ministers, but also set out a plan for local government reorganisation, which had not been shared with district and borough councils. Within this White Paper, the Government has stated that it wishes to see the rapid creation of new, far larger local authorities on a unitary basis, and with it the abolition of existing and historic boroughs, including Newcastle-Under-Lyme.
- 2.3** Following the resignation of the Deputy Prime Minister Secretary of State for Housing, Communities and Local Government, Rt Hon. Angela Rayner MP, and the subsequent removal of Jim McMahon MP (former Local Government and English Devolution Minister) from Government, the incoming Secretary of State, Rt. Hon. Steve Reed OBE MP, wrote to all Council Leaders confirming he was holding to the

timetable for local government reorganisation set out by previous Ministers and that it is intended to happen within the lifetime of the current parliament, with all new structures in place by Spring 2028.

- 2.4** There have, however, been some changes within the Devolution Priority Programme (those areas on an accelerated devolution programme), with two elections delayed to 2027 from an intended establishment date of 2026.
- 2.5** The Ministry of Local Government, Housing and Communities (MHCLG) has also redesignated Ministerial portfolios, with the previous Local Government and English Devolution Minister being styled the Minister for Local Government and Homelessness, indicating a change in emphasis around areas of priority delivery. Devolution has been incorporated into a new junior ministerial position alongside the key areas of Faith and Communities.
- 2.6** Government officials have indicated that differing proposals may be submitted for an area, with Ministers selecting proposals which most closely match the criteria to be brought forward in the guidance following the publication of the White Paper. It is intended that, in the case that no agreement is reached across Staffordshire, Newcastle will submit its own final submission and accompanying documentation.
- 2.7** Officers continue to meet with MHCLG officials, council networks and other authorities in the shaping of submissions for November. Since May 2025, two meetings of Staffordshire Leaders on LGR and Devolution have also taken place.

Proposed Structures and Options

- 2.8** The Government's White Paper sets out that it seeks "universal coverage in England of Strategic Authorities (SA's) - which should be a number of councils working together, covering areas that people recognise and work in". Strategic Authorities are intended to reduce duplication and give cities and regions a bigger voice, while utilising economies of scale.
- 2.9** Strategic Authorities should be at scale, reflecting a regional economic and cultural geography, such as those already established in places such as Greater Manchester, West Yorkshire and the West Midlands. The Government's default assumption is for them to have a combined population of, or greater than, 1.5 million. It acknowledges that some places may have different, smaller geographies where this makes sense.
- 2.10** A Strategic Authority at a minimum of Staffordshire and Stoke-on-Trent (or wider scale if this is deemed suitable) has the potential to enable scaled investment in infrastructure and support economic growth and is supported by all authorities in the area. It is intended that a devolution growth framework will be developed to accompany submissions on LGR in November 2025, as the region risks being excluded from major funding opportunities.
- 2.11** With the firm position that the Council supports the retention of an effective two-tier system, were unitarisation to be imposed, the Council has worked with its appointed consultants, Ignite, to develop and model the five options resolved by full Council in March 2025 for further investigation.
 - 2.11.1** The creation of a new unitary council on the existing geographical footprint of Newcastle-under-Lyme Borough Council as a preferred option;
 - 2.11.2** The creation of a new unitary council across the existing geographies of neighbouring Newcastle-under-Lyme and Staffordshire Moorlands;

- 2.11.3** The creation of a new 'West Staffordshire' unitary council based on a connected M6 corridor, comprising Newcastle-under-Lyme, Stafford, Cannock, South Staffordshire.
 - 2.11.4** The creation of a new unitary council comprising the existing unitary area of Shropshire and the existing borough geography of Newcastle-under-Lyme;
 - 2.11.5** The creation of a new single unitary council on the existing geographical footprint of Staffordshire County Council, as proposed in its Interim Plan by the County Council.
 - 2.11.6** The Council has also modelled the creation of a new unitary council for the whole of North Staffordshire, which would include Newcastle-under-Lyme, Stoke-on-Trent and Staffordshire Moorlands, as proposed by Stoke-on-Trent City Council, which was not supported by full Council in March 2025.
- 2.12** The preferred option is for a single Newcastle unitary authority, as set out in Appendix A. This is based on detailed work by the Council and its consultants as set out in Appendix B, and a strong majority of opinion from the Council's public online survey (with some 59% of respondents supportive of the model).

Devolution

- 2.13** The Council has been clear in its view that Staffordshire and Stoke-on-Trent are ready to delivery a dynamic and meaningful devolution agenda, and will continue to work together in making the strongest possible case for securing powers and devolution outcomes for the region. Local Government Reorganisation should not have been a precursor to devolution, and presents a significant risk to Staffordshire and Stoke-on-Trent's economy, skills, transport and strategic plans that our county falls behind other regions in securing funding and powers.
- 2.14** The Council continues to work with other authorities to develop a Local Growth Plan (strategic devolution plan) for Staffordshire and Stoke-on-Trent, using the submission to HM Government in September 2024 as the basis of this plan. The 2024 submission has been used as the basis for the Council's proposed devolution approach within the Submission for Local Government Reorganisation (as set out in Appendix B to this report).
- 2.15** The Council will continue to lobby for devolution powers and funding on a rapid timescale.

3. Recommendation

- 3.1** It is recommended that Council notes the work undertaken in the preparation of a final Local Government Reorganisation submission to UK Government from Newcastle-under-Lyme Borough Council, which sets out the case for a single unitary council for Newcastle-under-Lyme and endorses this submission.

4. Financial and Resource Implications

- 4.1 As noted in the report to full Council of 22nd January 2025, the Government has, to date, not provided an investment case or intended savings arising from local government reorganisation.
- 4.2 The act of reorganisation brings significant but as yet not fully quantifiable costs. The modelling of the options for investigation sets out forecast financial sustainability arising from revenue generation, transformation benefits and implementation costs. These vary across each option for investigation, but across all options are viewed as more marginal than some comparator area submissions.
- 4.3 As set out in the Local Government Reorganisation report to Cabinet of 8th July, the Council has set aside £200,000 for initial work on its submission to Government. On 3rd June 2025, the Ministry of Housing, Communities and Local Government confirmed allocations for all 21 areas working on local government reorganisation proposals. For Staffordshire and Stoke-on-Trent, this equated to £367,336, based on a baseline sum of £135,000, plus an additional 20p per person based on the latest ONS population estimates. Following an initial proposal to exclude Newcastle from any funds, officers have worked with MHCLG to secure £36,734, equating to one-tenth of the funding for Staffordshire and Stoke-on-Trent.

5. **Major Risks & Mitigation**

- 5.1 Much remains unknown of detail at this stage so mitigation measures cannot yet be fully considered. Potential risks at this stage include staff recruitment and retention, a reduction in service delivery under a larger local authority, a potential 'democratic deficit' as details of local governance arrangements continue to be developed.
- 5.2 *Financial sustainability* – Over recent years, the Council has delivered a balanced budget based on efficiencies across its services and investment in the borough whilst seeking to maintain optimum delivery for residents. It is unknown at what stage in a reorganisation process would restrict spending or borrowing, or whether areas in a much worse financial position would be prioritised over Newcastle.
- 5.3 A unitary council would have significantly greater spend responsibilities than existing borough and district councils, with statutory provision taking precedence over non-statutory and discretionary service delivery.
- 5.4 Effectiveness of change – There is a lack of proven success where local government reorganisation has taken place elsewhere in the country to date, and to date the Government has provided limited detail on the business case/benefits of the approach being described in the White Paper.
- 5.5 Restructuring and staffing - The process of local government reorganisation to new councils and the creation of a Strategic Authority would result in changes in employing organisations and structures. TUPE will apply to staff moving between organisations for the same roles as those that they undertake presently. This will be the responsibility of the vesting (new) authority. Following that process, the new authority will conduct an assessment of resource need.
- 5.6 It is likely that implementation of Local Government Reorganisation will have significant impact across the Borough, this initial stage is commencing the development of the outline proposals to be submitted to Government. The Legislation will be subject to an impact assessment.

6. UN Sustainable Development Goals (UNSDG)



7. One Council

7.1 Please confirm that consideration has been given to the following programmes of work:

One Commercial Council ☒

We will make investment to diversify our income and think entrepreneurially

The reorganisation of local government would change the commercial asset holding of councils, for example leisure centres and museums, and decisions would be made on these at a unitary level.

One Digital Council ☒

We will develop and implement a digital approach which makes it easy for all residents and businesses to engage with the Council, with our customers at the heart of every interaction.

A new approach to digital delivery will become necessary through LGR, including the mapping of shared service opportunities.

One Sustainable Council ☒

We will deliver on our commitments to a net zero future and make all decisions with sustainability as a driving principle

Newcastle Borough Council has sustainability programme to meet a 2030 target for its scopes 1 and 2 emissions. Other local authorities are at different stages of implementing sustainability approaches.

8. Key Decision Information

8.1 This is a key decision as local government reorganisation may affect residents in all wards.

9. Earlier Cabinet/Committee Resolutions

9.1 Cabinet – 4th June 2024 – Staffordshire Leaders Board Joint Committee

- 9.2 Cabinet – 9th January 2025 – Devolution and Local Government Reorganisation: White Paper
- 9.3 Full Council – 22nd January 2025 – Devolution and Local Government Reorganisation White Paper
- 9.4 Special Full Council – 19th March 2025 – Newcastle-under-Lyme Borough Council Response to Local Government Reorganisation
- 9.5 Cabinet – 8th July 2025 – Local Government Reorganisation
- 9.6 Cabinet – 4th November 2025 - Local Government Reorganisation Update

10. **List of Appendices**

- 10.1 Appendix A – Local Government Reorganisation Options
- 10.2 Appendix B - Submission for Local Government Reorganisation (to follow)
- 10.3 Appendix B(i) – Appendix 7(i) Interim Plan Submission
- 10.4 Appendix B(ii) – Appendix 7 (i) Interim Plan Feedback Form Staffordshire and Stoke on Trent
- 10.5 Appendix C – Letter from MHCLG, June 2025
- 10.6 Appendix D – Public Survey Results

11. **Background Papers**

- 11.1 [English Devolution White Paper](#), December 2024, HMSO.

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Appendix A

Outline of Preferred Option for Local Government Reorganisation

Introduction

Newcastle-under-Lyme Borough Council has, since the English Devolution White Paper was launched by UK Government in December 2024, taken a strong stance that forced local government reorganisation presents a distraction both from the effective working of local authorities and from the goal – shared by all ten authorities in Staffordshire and Stoke-on-Trent – of meaningful and impactful devolution to the region. The Council remains of the view that reorganisation presents an unknown cost, risk and challenge to the delivery of services to residents and businesses in Newcastle-under-Lyme.

In our Interim Proposal, we were clear that Newcastle-under-Lyme has a long and proud history, a forward-looking view of adaptation for the future and a strong sense of place, working alongside our neighbours. This assessment recognised that across our region, we will strive for and all gain from economic investment in our region at all scales – from local businesses starting up and growing across Staffordshire and Stoke and beyond, to established global advanced manufacturing and world class service industries, with innovative regenerators of our town and city centres together with cutting edge spin-outs from our great academic institutions – all have a part to play at attracting and retaining investment, and the higher-skilled, higher-paid jobs we all aspire to be available to those who live and work here.

With this in mind, we needed to be clear on and test a number of factors:

- A majority of support from our residents to move to a new structure of local government;
- A balanced economy where places which invest and manage finances with strong fiduciary responsibility are not placed at disadvantage in ‘plugging gaps’ in areas which are struggling;
- A level of governance which demonstrates the true objective of devolution – having decisions made at the most appropriate local level, closest to those the decisions will affect;
- A geography which has meaning for investors, businesses, residents and anchor organisations (including co-terminus delivery where this makes sense)
- A population size which broadly aligns to broader objectives but has a local rationale – not so distant as to be remote governance, not an arbitrary level which confuses geography and population.

- A solution which will ensure that we continue to deliver quality services at the highest possible standard, not to the lowest common denominator or on a reduced basis to address historic financial troubles.

At its special meeting of 19th March 2025, full Council voted to endorse the Interim Proposal with its five options for investigation. These were:

1. A single unitary council based on the existing footprint of Newcastle-under-Lyme Borough Council (the preferred option of all parties);
2. The creation of a new unitary council across the existing geographies of neighbouring Newcastle-under-Lyme and Staffordshire Moorlands;
3. The creation of a new 'West Staffordshire' unitary council based on a connected M6 corridor, comprising Newcastle-under-Lyme, Stafford, Cannock, South Staffordshire;
4. The creation of a new unitary council comprising the existing unitary area of Shropshire and the existing borough geography of Newcastle-under-Lyme; and
5. The creation of a new unitary council on the footprint of the existing Staffordshire County Council.

At this meeting of Council, all parties rejected the inclusion of a North Staffordshire model (comprising Newcastle, Staffordshire Moorlands and Stoke-on-Trent) as an option for investigation.

What has changed?

Since the submission of an Interim Proposal in March 2025, and subsequent feedback from UK Government on 6th June 2025 (see Appendix B), there have been a number of changes to both the local and national context which have been included in considerations of the options for investigation. These include:

- The Government's amendment of population size from 500,000 as a hard target to asking that final submissions set out a clear rationale for their selected population size;
- The experience of local government reorganisation submissions in Surrey on 9th May 2025 and those areas within the Devolution Priority Programme (DPP) which submitted on 26th September 2025 showed that a variety of models for LGR delivery could be brought forward for consideration by Government – with no area submitting a single submission for their invitational area;
- The election of a new Administration for Shropshire Council, who are taking the necessary time to consider options for LGR (being outside of an invitational area) and devolution arrangements;
- The declaration by Shropshire Council of a 'financial emergency' has been considered where information has been available in the modelling of options – at this time, the full impact cannot be fully modelled so is considered a risk;

- The election of a new Administration for Staffordshire County Council, which has reviewed the County Council's previous position for a single unitary model and developed alternate options, including its preferred option of a two-unitary council model on a west-east footprint covering the whole of Staffordshire and Stoke-on-Trent. This model mirrors the west unitary option for investigation put forward by Newcastle-under-Lyme Borough Council in March 2025.
- The confirmation of its position by Staffordshire Moorlands District Council in favour of a North Staffordshire unitary authority comprising Newcastle-under-Lyme, Staffordshire Moorlands, Stoke-on-Trent and parts of the existing Stafford and East Staffordshire Borough Councils.

Consultation

Since December 2024, the Council has been engaged with key stakeholders in respect of the potential for shaping a meaningful local government geography. This engagement has taken place both through the Council's work directly, and in consort with other authorities across Staffordshire and Stoke-on-Trent, to reduce the consultation burden on strategic partners and explore key themes. This engagement work continues with stakeholders holding focused sessions with the Council's consultants.

Following receipt of the UK Government's response to Interim Proposals in June 2025, the Council has also carried out an online consultation with residents, businesses, those who work in and visit Newcastle-under-Lyme and Staffordshire/Shropshire. The results of this consultation are set out in Appendix C.

Modelling for a Preferred Option

The Council has engaged respected consultants, *Ignite*, to work with the authority on developing a final submission and business case, including modelling of the five options for investigation and reviewing comparator data for models being considered across the invitation area.

This modelling responds to the criteria set out in the invitation letter of January 2025, namely that a proposal:

- Supports sustainable economic growth, housing and infrastructure delivery
- Unlocks the full benefits of devolution
- Reflects and empowers Staffordshire's unique local identities and places
- Provides strong democratic accountability, representation and community empowerment
- Delivers high-quality, innovative and sustainable public services that are responsive to local need and enable wider public sector reform
- Secures financial efficiency, resilience and the ability to withstand financial shocks

UK Government has confirmed that these criteria will not be weighted in their consideration of submissions, but the modelling also seeks to demonstrate – for each option – the financial impacts including a financial sustainability baseline;

transformational and reorganisation benefits; and implementation costs. The modelling also considers the number of times existing authorities are disaggregated; the complexity of disaggregation; the number of authorities being proposed; and the presence of continuing authorities.

Further considerations

In considering the options for investigation, the modelling for the final submission and business case will take into account the proposed governance arrangements, final shaping of a Strategic Authority area, preservation of ceremonial arrangements (with further work required post-submission in respect of the legal considerations of Newcastle's Aldermen and Burgesses), neighbourhood governance arrangements (including both the existence and absence of town and parish councils across the geography) and the presence or otherwise of a continuing authority.

Moreover, it is recognised that the reshaping of local government presents a distinct challenge, but if forced to do so the Council would wish to use the process to reshape the delivery of services at the right scale, balanced against the need to have unitary councils of the right shape and size for their population, heritage, functional economic and delivery area, and sense of place.

The Council and its consultants have elected to follow the guidance of UK Government in a preferred approach of using existing district, borough and unitary council boundaries as the building blocks of reorganisation modelling.

Newcastle-under-Lyme Borough Council's preferred option recognises that a range of public services are already delivered across a wide geography, and this will be further amended by the creation of, for example, new ICB geographies. The Council believes there are significant opportunities to reduce deficits and deliver more efficiently by implementing a 'shared-service first' approach to those parts of delivery which can best be delivered at scale, whilst retaining the local dimension for delivery at a local level to our residents and businesses. Examples of opportunities for shared service delivery include:

- Joint procurement of goods and services;
- IT and digital delivery;
- Using the Staffordshire Waste Partnership as a foundation for delivery of a single waste approach;
- Joined up, intelligence-led and customer responsive regulatory services;
- Strategic housing approaches to temporary accommodation;
- Support functionality

These known areas of challenge provide an opportunity to reshape delivery in areas where councils (of any size) face national burdens, recruitment challenges and a lack of strategic scale.

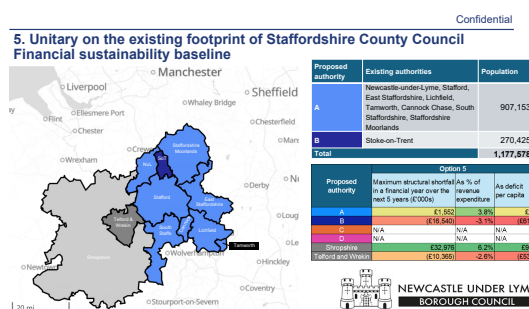
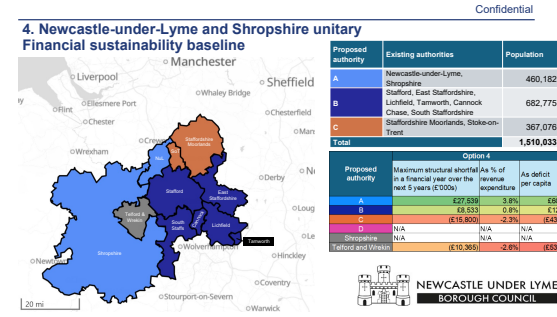
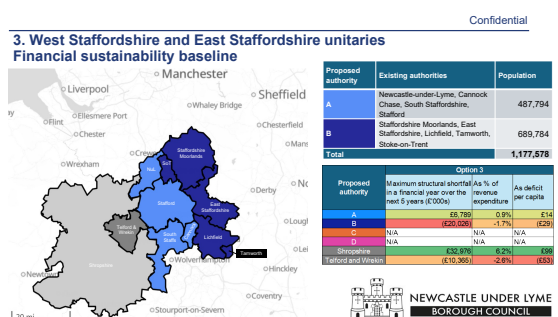
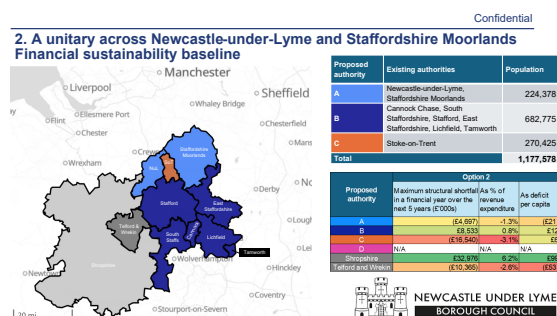
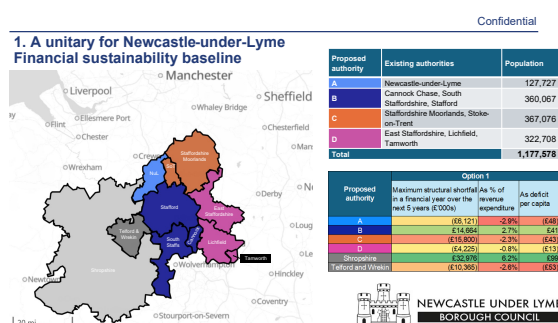
Preferred Option

UK Government has specified that each local authority within an invitation area can only support one preferred option for local government reorganisation within that area. The form of submission can be via a single submission with one proposal from more than one authority, a submission with multiple proposals from more than one authority, or a single proposal from one authority.

As set out above, the five options for investigation have been considered against relevant factors including population size and financial sustainability, as indicated below for each option for investigation. Financial modelling is subject to:

- Final agreement on approach and timing of council tax harmonisation
- Inclusion of transition and transformation cost/benefit profile

In each model, a notional strategic authority area of Staffordshire, Stoke-on-Trent and Shropshire was adopted.



1. A unitary authority for Newcastle-under-Lyme (Preferred Option)

The considerations around this model included the minimisation of impact to existing residents and businesses within Newcastle-under-Lyme, the projected growing population of the geography (as quantified in the Newcastle-under-Lyme draft Local

Plan, currently under examination), continuity of governance arrangements and public support.

Confidential

1. A unitary for Newcastle-under-Lyme Financial sustainability baseline



Proposed authority	Existing authorities	Population
A	Newcastle-under-Lyme	127,727
B	Cannock Chase, South Staffordshire, Stafford	360,067
C	Staffordshire Moorlands, Stoke-on-Trent	367,076
D	East Staffordshire, Lichfield, Tamworth	322,708
Total		1,177,578

Proposed authority	Option 1		
	Maximum structural shortfall in a financial year over the next 5 years (£'000s)	As % of revenue expenditure	As deficit per capita
A	(£6,121)	-2.9%	(£48)
B	£14,664	2.7%	£41
C	(£15,800)	-2.3%	(£43)
D	(£4,225)	-0.8%	(£13)
Shropshire	£32,976	6.2%	£99
Telford and Wrekin	(£10,365)	-2.6%	(£53)



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It is recognised that the population size is some way below the indicative target population set out by Government, but exceeds that of existing and well-functioning unitary councils in areas not subject to reorganisation (such as in Wales), not likely to be reorganised (including the Isle of Wight) or seeking to maintain their status in any reorganisation plans (such as Rutland).

Newcastle-under-Lyme is a cohesive geography, and one that reflects its strategic location, so that some of our communities naturally look to other places – from Mow Cop with its spilt conurbation between Newcastle and Cheshire East, to Madeley at the border with rural Shropshire and the Westlands bordering Stafford, with Wolstanton and May Bank bordering our neighbours in Stoke-on-Trent, our well-connected place can and should look to have a cohesion with not one geography but exploit and maximise each and every one of its economic links.

The existing footprint has many of the features of other, larger unitary councils, including one of the largest FE provisions in the region, strategic links by road to all parts of mainland Britain, a leading university, an abundance of protected green space, room for sustainable housing growth and infrastructure and governance at a sufficiently local level which would not require major upheaval.

Implementation of shared service arrangements would be essential under this model to reduce the structural shortfall for the new unitary over the early period of its existence.

This model also looks to accommodate (where not in direct conflict with stated aims of Council resolutions) meaningful geographies across the rest of the invitation area

– i.e. the creation of a North Staffordshire authority for those authorities supportive of this model (Stoke-on-Trent and Staffordshire Moorlands), and matching geographies in the centre and south of Staffordshire), all with roughly equal populations.

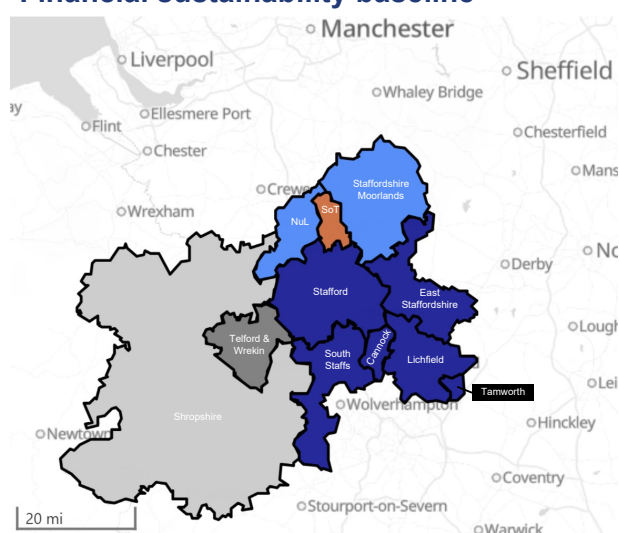
The Newcastle-under-Lyme unitary council would be a continuing authority (a unitary borough council).

2. A unitary council across Newcastle-under-Lyme and Staffordshire Moorlands

The model proposed to link Newcastle-under-Lyme with Staffordshire Moorlands focuses primarily on two factors – not burdening either existing authority area with the financial impacts of alignment with Stoke-on-Trent and a recognition of a commonality of population spread and geographic similarity, places of towns and rural villages which recognise and celebrate their size and scale, not to become city suburbs or infill.

Confidential

2. A unitary across Newcastle-under-Lyme and Staffordshire Moorlands Financial sustainability baseline



Proposed authority	Existing authorities	Population
A	Newcastle-under-Lyme, Staffordshire Moorlands	224,378
B	Cannock Chase, South Staffordshire, Stafford, East Staffordshire, Lichfield, Tamworth	682,775
C	Stoke-on-Trent	270,425
Total		1,177,578

Proposed authority	Option 2		
	Maximum structural shortfall in a financial year over the next 5 years (£'000s)	As % of revenue expenditure	As deficit per capita
A	(£4,697)	-1.3%	(£21)
B	£8,533	0.8%	£12
C	(£16,540)	-3.1%	£6
D	N/A	N/A	N/A
Shropshire	£32,976	6.2%	£99
Telford and Wrekin	(£10,365)	-2.6%	(£53)



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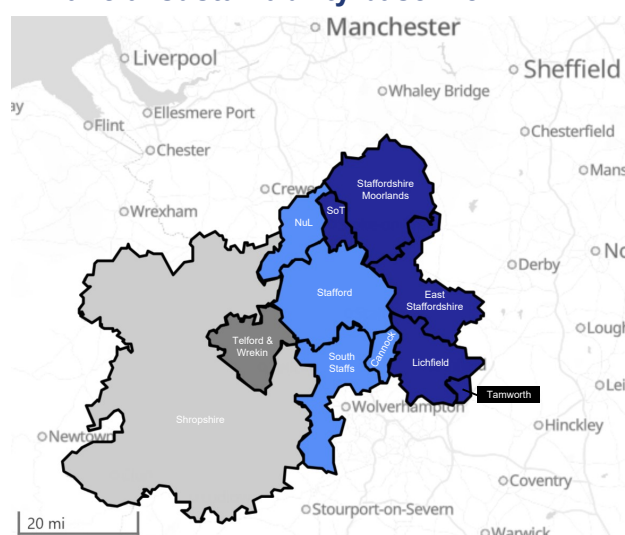
Modelling shows a slightly smaller structural shortfall than option 1, based on the ability to introduce council tax harmonisation and economies of scale, however this is offset by the assumption that Stoke-on-Trent would be 'islanded', and the expectation of Government that failing unitary authorities will be supported through the reorganisation process. The model also shows a sizeable imbalance between authority sizes across the invitation area.

3. West and East Staffordshire Authority Areas (County Council new model)

The initial option for investigation set out in the Council's Interim Proposal in March 2025 was to look at a 'West Staffordshire' unitary authority to cover the geography of Newcastle-under-Lyme, Stafford, Cannock and South Staffordshire. For the purposes of modelling, an attendant 'east' authority area was set out as below.

Confidential

3. West Staffordshire and East Staffordshire unitaries Financial sustainability baseline



Proposed authority	Existing authorities	Population
A	Newcastle-under-Lyme, Cannock Chase, South Staffordshire, Stafford	487,794
B	Staffordshire Moorlands, East Staffordshire, Lichfield, Tamworth, Stoke-on-Trent	689,784
Total		1,177,578

Proposed authority	Option 3		
	Maximum structural shortfall in a financial year over the next 5 years (£'000s)	As % of revenue expenditure	As deficit per capita
A	£6,789	0.9%	£14
B	(£20,026)	-1.7%	(£29)
C	N/A	N/A	N/A
D	N/A	N/A	N/A
Shropshire	£32,976	6.2%	£99
Telford and Wrekin	(£10,365)	-2.6%	(£53)



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This model was subsequently endorsed by Staffordshire County Council in its Cabinet paper of September 2025. The model proposes two larger unitary authorities across the Staffordshire and Stoke-on-Trent geography, and in the case of a larger Strategic Authority (SA) area (to include Shropshire and Telford & Wrekin), would see the M6 corridor as the centre point of a new SA.

The option would give strong initial financial stability for the West Staffordshire unitary council and deliver an option for Newcastle to be located within a more akin geography. However, neighbourhood governance arrangements would need to be put in place – potentially with some significant cost – to support local accountability, democracy and delivery.

This model also has potential as the basis of a shared services approach across wider geographies.

4. A Newcastle-under-Lyme and Shropshire Unitary

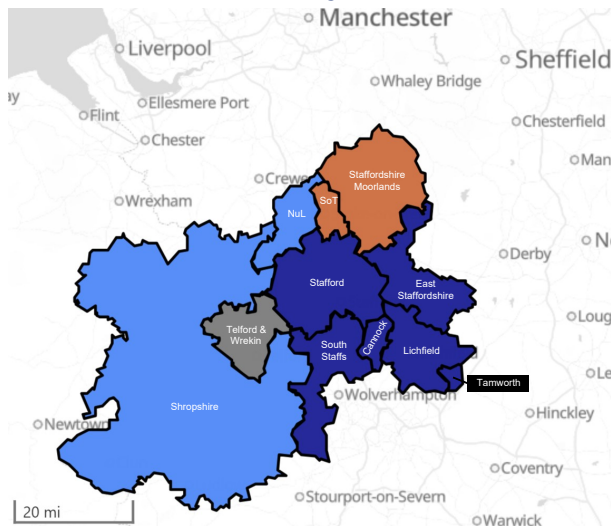
This model would give a close fit to the Government's initial target figure of 500,000 of population. Newcastle and the existing unitary council of Shropshire share a long border, extending to Shropshire addresses and postcodes for many residents in the west of Newcastle. Newcastle and Shropshire share a cohesive sense of place – historic market towns with an established and characteristic rural hinterland. The council would also incorporate two sides of the M6 corridor (as noted above) with onward links to the M54

corridor. This model would also fit alongside revised ICB arrangements for health, but would require new legislation (currently being enacted) in respect of Police authorities.

Following the election of a new Administration at Shropshire Council, commitment to shared working remains uncertain and financial modelling will need to take account of Shropshire's challenging financial position.

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4. Newcastle-under-Lyme and Shropshire unitary Financial sustainability baseline



Proposed authority	Existing authorities	Population
A	Newcastle-under-Lyme, Shropshire	460,182
B	Stafford, East Staffordshire, Lichfield, Tamworth, Cannock Chase, South Staffordshire	682,775
C	Staffordshire Moorlands, Stoke-on-Trent	367,076
Total		1,510,033

Proposed authority	Option 4		
	Maximum structural shortfall in a financial year over the next 5 years (£'000s)	As % of revenue expenditure	As deficit per capita
A	£27,539	3.8%	£60
B	£8,533	0.8%	£12
C	(£15,800)	-2.3%	(£43)
D	N/A	N/A	N/A
Shropshire	N/A	N/A	N/A
Telford and Wrekin	(£10,365)	-2.6%	(£53)



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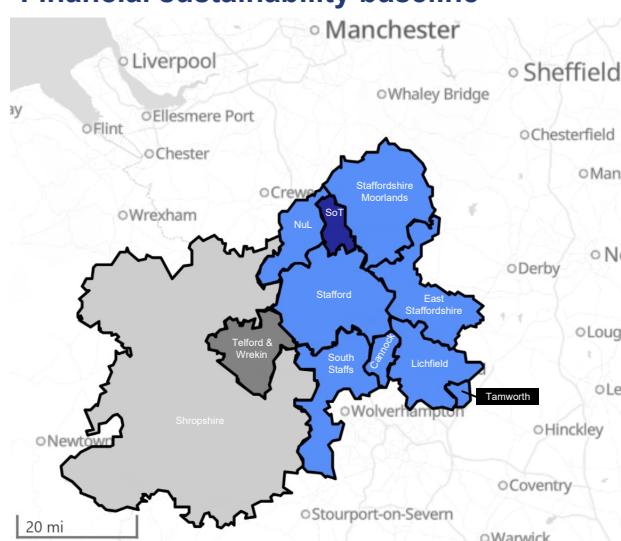
5. A single unitary council on the existing footprint of Staffordshire County Council

This option was included following confirmation of Staffordshire County Council's interim submission in March 2025. Since that time, as noted above, the County Council has developed alternate options.

Whilst the single unitary council would have some strong levels of financial power, the primary challenges lie with the remoteness from local accountability, the overall size (larger than nearly all existing unitary councils) and leaving Stoke-on-Trent islanded. For these reasons, the option is not being further investigated.

Confidential

5. Unitary on the existing footprint of Staffordshire County Council Financial sustainability baseline



Proposed authority	Existing authorities	Population
A	Newcastle-under-Lyme, Stafford, East Staffordshire, Lichfield, Tamworth, Cannock Chase, South Staffordshire, Staffordshire Moorlands	907,153
B	Stoke-on-Trent	270,425
Total		1,177,578

Proposed authority	Option 5		
	Maximum structural shortfall in a financial year over the next 5 years (£'000s)	As % of revenue expenditure	As deficit per capita
A	£1,552	3.8%	£2
B	(£16,540)	-3.1%	(£61)
C	N/A	N/A	N/A
D	N/A	N/A	N/A
Shropshire	£32,976	6.2%	£99
Telford and Wrekin	(£10,365)	-2.6%	(£53)



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6. A North Staffordshire Unitary Authority

Newcastle's full Council rejected investigation of a North Staffordshire Unitary authority at its meeting of March 2025. However, given the current stated intention of Stoke-on-Trent City Council and Staffordshire Moorlands District Council to submit a proposal covering a North Staffordshire geography of Newcastle-under-Lyme, Stoke-on-Trent and Staffordshire Moorlands, an assessment was made of this option. Together with strong public support to remain unaligned with Stoke-on-Trent, the structural shortfall (as echoed in all other options) of aligning with Stoke were significant, and risks to service delivery, local identity and heritage were prominent. This option cannot therefore be supported.

Devolution

The Government has set out that, in addition to the creation of new local authority structures to unlock devolution, it wishes to establish new Strategic Authorities (SAs) at a wider geography to provide the basis of greater levels of regional representation and investment. The primary models set out by the Government are:

We are supportive of the creation of a new Strategic Authority to serve the collective needs of Staffordshire and Stoke. Given its connection along council boundaries and the M6 as our point of economic linkage, we believe it makes sense to also consider a Strategic Authority area which includes Shropshire (and if appropriate Telford & Wrekin) which would have the additional advantage of ensuring no area is 'orphaned' within the SA process. We anticipate that these areas will work collectively in the shaping of an SA which meets the needs of our collective geography and builds on our collective devolution ambitions, as set out to the Government in Autumn 2024, where we noted that our devolved region should have the following key features:

- Devolution must work for all: plans must reflect and respond to a deep understanding of local needs and opportunities. That is what our authorities have been working hard at over the summer.
- Form must follow function: if we are to accept another layer of governance in the county, at additional cost to the people of Staffordshire and Stoke-on-Trent, then the prize in terms of devolved functions, powers and resources has to be significant.
- Governance has to be inclusive: the existing model works because all local authorities get to participate and contribute, and we want to ensure that this is also the case in any devolved arrangements.
- Commitment to subsidiarity: devolution should be to the most appropriate level of governance for the function in any question, and that should mean a combination of county-wide, local authority level and, perhaps most importantly, community level. We seek a devolution deal that gives us flexibility to make those judgements together.

Devolution at a Strategic Authority level is not about local service delivery, but rather setting the conditions at a strategic level, making the case for and directing funding towards, for example, areas to develop infrastructure at a local level. To support the final submissions, a joint devolution growth framework will be developed and submitted by, for and on behalf of all authorities in Staffordshire and Stoke-on-Trent.

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Submission for Local Government Reorganisation



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Foreword

Newcastle-under-Lyme Borough Council has been clear in its assertion that the two-tier system of local government works, and works well, in Staffordshire.

Local Government Reorganisation did not appear in any manifesto, is not a priority for our county and the time, effort and money spent on this process actively risks impacting both our excellent delivery of services in Newcastle-under-Lyme and our ability to get on with real devolution in bringing further powers and funding to Newcastle-under-Lyme and the wider region.

We have continued to call on our Members of Parliament and Government Ministers to stop and reconsider the process in Staffordshire and Stoke-on-Trent. This is not about local 'rivalries' as some have portrayed our approach, it is fundamentally about continuing to protect local governance and democracy which best serves our community. It is not too late to change direction, and I call on Ministers to do so.

Newcastle-under-Lyme has a proud history which stretches back over eight and a half centuries. In 2023, when we celebrated our 850th anniversary, we saw the clear passion that our residents and businesses have for our great place – this civic pride is reflected in the strength of feeling of their wish to preserve the geography of our Loyal and Ancient Borough.

With that in mind, we have set out in this proposal a compelling and comprehensive proposal for Staffordshire and Stoke-on-Trent, where we have taken on board the proposals of our neighbouring authorities and looked to accommodate these where we can, whilst making the strongest case for Newcastle-under-Lyme, which we believe lies in a single unitary on the existing geography of our Borough.

Working with our consultants, Ignite, the Council has set out how we believe we meet the criteria for reorganisation whilst maintaining the integrity of our great Borough. I commend this proposal for consideration by the Secretary of State.

Cllr. Simon Tagg, Leader of the Council

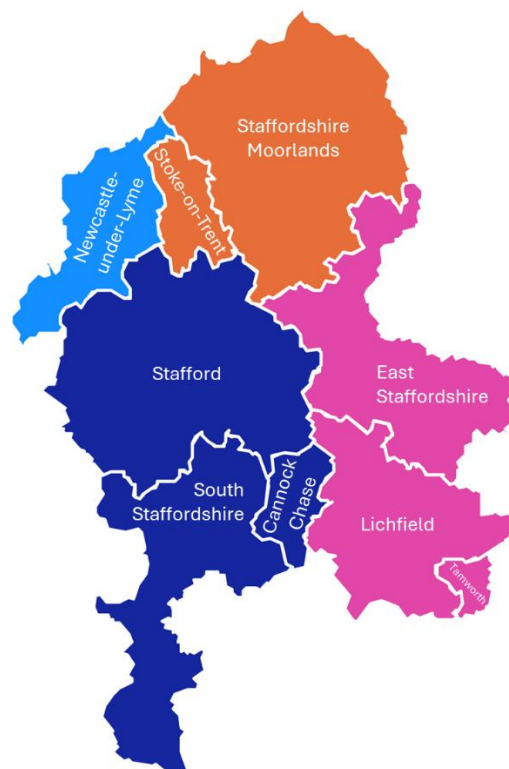
on behalf of Newcastle-under-Lyme Borough Council



Executive summary

In this submission, Newcastle-under-Lyme Borough Council sets out the case for a model of four unitary authorities in Staffordshire and Stoke-on-Trent, built on the existing boundaries of Staffordshire's borough and district councils and the city council. This would deliver:

- A single unitary authority for Newcastle-under-Lyme
- A unitary authority covering Stoke-on-Trent and Staffordshire Moorlands
- A unitary authority covering Stafford, Cannock and South Staffordshire
- A unitary authority covering East Staffordshire, Lichfield and Tamworth



The political leadership of the Borough Council has been clear that the advantages of retaining the two-tier system in Staffordshire far outweigh the benefits of reorganisation. If reorganisation is mandated by Government, there is strong cross-party support for a single unitary authority on the existing boundaries of Newcastle-under-Lyme. For the remainder of the invitation area, three sustainable unitary authorities would be created which take into account the proposals of other existing councils.

A single unitary council for Newcastle-under-Lyme responds to the genuine concerns of residents in being subsumed into a larger authority with Stoke-on-Trent and the data set out in this proposal are clear that there would be immediate and lasting impacts for residents of the borough if a North Staffordshire model including Newcastle was to be enacted, financially and in respect of service delivery. The data show that any option involving the city results in an immediate and potentially long-term challenge. Stoke-on-Trent and Staffordshire Moorlands councils have opted to merge. We respect that choice as set out in the unitary option we propose for that area, but firmly believe that Newcastle would not benefit from being part of this structure.

Newcastle-under-Lyme already benefits from well-run, locally delivered services. Both upper-tier and lower-tier authorities for the geography are financially stable, the Borough Council would be able to transition to delivery of a new unitary authority in the strongest position to enable continuity of delivery.

Decisions made locally benefit our communities, and governance must start from a position that existing elected member arrangements are effective in their link to electors. We have modelled options based on guidance, but firmly ask that Government seeks to maintain higher levels of elected members across the whole of the county and city, not make governance more remote and distant from those we serve.

This structure is designed to unlock devolution, deliver strategic growth, and ensure responsive, locally focused governance aligned with the government's ambitions for regional prosperity.

An empowered Mayoral Strategic Authority (MSA): the four-unitary model provides a robust foundation for a Strategic Authority. This proposal assumes a Staffordshire and Stoke-on-Trent Mayoral Strategic Authority, enabling coherent regional planning and delivery of devolved powers in transport, skills, and infrastructure. In our modelling, we have considered that Government may place Staffordshire and Stoke-on-Trent into a wider MSA.

Functional economic geographies: we have aligned the new council boundaries with natural economic areas allows each authority to tailor growth strategies to local strengths, unlocking targeted investment and regeneration.

Business-led growth: Staffordshire has a strong track record of encouraging, attracting and growing businesses at all sizes, bringing innovation, employment and skills to our county. Smaller, focused councils can continue foster close relationships with local businesses, enabling responsive support and development of strategic employment sites. We will work across all new authorities and with the MSA to deliver economic growth across our county. The successful We Are Staffordshire model, supported by all ten current local authorities, is a blueprint for future work.

Local Planning expertise: each unitary council will have deep understanding of its area's sensitivities, challenges, and opportunities, critical for meeting ambitious housing targets. Newcastle-under-Lyme's Local Plan, currently at the final stages of examination, enables sustainable development to commence from day one of the new authority, whilst avoiding the inappropriate development and urban sprawl which may result from a merger with the city.

Infrastructure alignment: councils will be better positioned to ensure housing growth is matched with appropriate infrastructure and services, protecting rural communities and enhancing our towns, building on the success of regeneration programmes in Newcastle and towns across the county.

Balanced finances: our independent advisors' modelling shows that the four-unitary model ensures councils are able to function in size and financial sustainability. No transition is without cost, and we believe that retention of the existing local authority arrangements present the best mitigation against increased cost pressures, removing the costs altogether. However, our proposed model is realistic and reflective of both costs and benefits.

Budget pressure mitigation: the local government sector has remained resilient in mitigating long-term budget pressures. In Newcastle, our annual efficiency boards have ensured a balanced budget,

well-managed reserves and no long-term debt. Reorganisation will inevitably impact on all councils undertaking transition, but proposed longer-term savings will help guard against uncertainty from the Fair Funding Review and offset future pressures. These are likely to include rising demand in high-risk services such as adult social care, children's services, and homelessness, which are key challenges across all four unitary authority areas. We have called on Government to mitigate the pressures by committing to fully fund the costs of reorganisation.

Shared services: there is a clear opportunity while we design new unitary structures to consider what is best delivered as shared service models, and what is best provided locally, in order to deliver excellence to our residents and customers. This proposal sets out areas which would support a shared service approach.

Our proposal centres on local democracy and accountability. We have listened to our community. Our proposed unitary authority model will be closer to the communities it serves, enabling meaningful engagement and responsive service delivery.

Our model offers the optimal balance of strategic scale and local responsiveness. It empowers delivery of tailored growth, infrastructure, and services while supporting a unified strategic vision. This structure is financially sound, democratically robust, and economically ambitious, positioning Staffordshire and Stoke-on-Trent for long-term success.

1. National and local context

1.1. National and legal context

In December last year, the Government set out a new direction for the future structure of local government. The whole of England will be overseen by Mayoral Strategic Authorities (MSAs); devolved regions with greater powers relating to housing, transport, economic growth, health and policing. The English Devolution White Paper (December 2024) and the English Devolution and Community Empowerment Bill provide the policy and legislative framework for this change.

Two-tier local government structures comprising of district and county councils are intended to be replaced by unitary arrangements, to 'unlock the benefits of this devolution'. This has created a requirement for Local Government Reorganisation (LGR). The statutory process is governed by the Local Government and Public Involvement in Health Act 2007 and shaped by ministerial guidance (published by MHCLG).

The Government's criteria for LGR proposals include the following, as a framework for every authority affected by the process to create proposals:

1. Supports sustainable economic growth, housing and infrastructure delivery
2. Unlocks the full benefits of devolution
3. Reflects and empowers Staffordshire's unique local identities and places
4. Provides strong democratic accountability, representation and community empowerment
5. Delivers high-quality, innovative and sustainable public services that are responsive to local need and enable wider public sector reform
6. Secures financial efficiency, resilience and the ability to withstand financial shocks

Newcastle-under-Lyme submitted a clear interim plan in March 2025 and received interim plan feedback in June 2025, which has led to development of this more detailed LGR submission required by 28th November 2025.

Following this proposal, the government is expected to launch statutory consultation in early 2026, with a decision on LGR expected before summer recess. Secondary legislation will then be prepared and implemented, subject to Parliamentary process and approval. This would allow for elections to the new unitary authorities on 6th May 2027 and the new authorities going live on 1st April 2028.¹

1.2. An introduction to Newcastle-under-Lyme

Newcastle-under-Lyme Borough Council is committed to serving the best interests of its residents, businesses, and visitors. With a proud history tracing back over 850 years and a proven track record of effective partnership working – locally, regionally, and beyond – the Council is well-placed to respond to the Government’s invitation for proposals on local government reorganisation.

This submission sets out the context, approach and rationale underpinning Newcastle-under-Lyme’s proposals, informed by both local priorities and the evolving national and legal framework for local government in England.

The Loyal and Ancient Borough of Newcastle-Under-Lyme traces its history back to 1173, when records show that Henry II had granted a charter to the town and gave strong support to the early borough over the next decade. Further royal charters have been granted to the borough by Kings Henry III, Edward I, Edward II, and Richard II, Queen Elizabeth I, Kings Charles II, James II and Queen Victoria.

The late Queen Elizabeth granted a new borough charter in 1974, following the Local Government Act of 1972.

This rich history was recently celebrated in the 850th anniversary events of 2023, and subsequent legacy activity. These events demonstrated a strong local association with the borough, including residents, civic groups, businesses and community organisations recognising the visit of the late Queen Elizabeth’s visit in 1973 to mark 800 years of the borough, and the statue to this visit was unveiled in 2024 in Queens Gardens.

In 1995, North Staffordshire governance arrangements changed further with the creation of the unitary authority of Stoke on Trent. Through this change, Newcastle-under-Lyme retained its borough status. The city subsequently trialled an elected mayoral model of governance, later abolished.

The Borough Council has demonstrated that it can focus and influence actions and decisions at a local level, close to residents, across areas which matter to them. This has recently included a number of key interventions.

Regeneration & Planning – developing working partnerships with developers and investors, our local social landlord and community interest groups, delivering a town centre regeneration programme in both Newcastle and Kidsgrove supported by Levelling Up funds which is responsive to both local need and investor opportunity. Forging and maintaining partnerships with national and local bodies has been both possible, and through nimble decision making has seized investment opportunities where a greater level of bureaucracy and more remote decision making may have stalled progress.

The Borough Council’s dedicated focus on supporting the community is illustrated by extensive issues at Walleys Quarry, a national-level ongoing environmental incident, with odour and emissions severely impacting the lives of residents. The Borough Council was first to take action to support our residents and lobbying for action from Government agencies. The Borough Council continues to lead in co-ordinating action. This would likely not have been a priority for a larger, more remote authority with multiple demands. This included the Council being bold in using its powers and pressing for permission to pursue legal action against the operators when other agencies were not doing so.

The increased attraction to visitors of the Brompton Museum, attracting investment and greater footfall, expanded facilities and usage by local groups. As the Borough Council's primary cultural facility, efforts have been focused on supporting growth and a heritage-led cultural offer for the borough. These advantages may be lost if the Borough is submerged into a larger Council.

A strong leisure offer, built on local partnerships. Recognising that differing models of delivery work better in local places, the Council has both invested in the Jubilee 2 centre, working with the healthcare sector, local users and groups, but has also supported and secured investment for the community-run Kidsgrove Sports Centre, both facilities providing a complementary offer across our two towns and the wider borough.

Civic Pride – from its award-winning Britain and Newcastle in Bloom achievements, to the introduction of the Civic Pride campaign to work with partners, residents, voluntary organisations and businesses, local people have demonstrated their desire to get behind borough-focused activities which support making our places cleaner, safer and more welcoming.

Sustainability – the Council has been able to adapt its working practices, investment and service delivery to ensure it meets its ambitious targets set out when it declared a climate emergency, including tree planting, planning, fleet and assets, and has worked with the private and academic sectors in developing borough-level initiatives. The ability to control these changes at a local level has seen a near 70% reduction in our controlled carbon emissions.

The Local Government Peer Challenge reported in 2023 that Newcastle-under-Lyme Borough Council was delivering quality services for its residents, and that particularly it had strengths in the following areas, all of which provide the basis of a scaled-up and effective unitary council:

- Strong pride of place and Newcastle-under-Lyme has a distinct identity
- Partnership working is particularly strong and the role it has in bringing others together to collaborate is highly valued
- Clear leadership from the Cabinet and senior officers
- Finances are healthy, and actively managed, which places it in a stable position
- Officers are recognised as important assets for us and they are committed and keen to deliver for the community they serve. Our joined-up approach to working with the existing County Council provides an opportunity to transition to an effective unitary authority
- The Council has set out its ambitions for the place and our community and attracted enviable amounts of Government funding to deliver physical regeneration

1.3. Interim plans and MHCLG feedback

Following submission of Interim Plans in March 2025, MHCLG provided joint feedback to all ten local authorities in Staffordshire and Stoke-on-Trent in June 2025. The complete feedback is included in appendix 7. This final submission has taken account of the feedback provided. Some key points from the feedback are set out below:

- *Some of the interim plans submitted only included proposals covering part of the area invited to submit proposals for local government reorganisation. For your final proposal(s), each council can submit a single proposal for which there must be a clear single option and*

geography and, as set out in the guidance, we expect this to be for the area as a whole; that is, the whole of the area to which the 5 February invitation was issued, not partial coverage

We have set out a detailed description of the whole invitation area, addressing all of the key criteria required by Government.

- *Given the financial pressures identified it would be helpful to understand how efficiency savings have been considered alongside a sense of place and local identity*
- *We recognise that the options outlined in the interim plans are subject to further development. In your final proposal(s) it would be helpful to include a high-level financial assessment which covers transition costs, and overall forecast operating costs of the new unitary councils*

This final submission sets out detail of our financial assessments, transformation benefits and costs associated with the creation of a single unitary council for Newcastle-under-Lyme and the wider region.

2. Vision and strategic objectives

2.1. Case for change

It is imperative that Staffordshire and Stoke-on-Trent do not fall behind other places in England in our ability to deliver meaningful devolution. We strongly believe that a Mayoral Strategic Area (MSA) on the boundaries of Staffordshire and Stoke-on-Trent alone, or as part of a wider MSA if directed by Government, has the ability to deliver greater national research, innovation, higher-paid and higher-skilled jobs, transport links and a buoyant economy.

Our collective work through We Are Staffordshire and the recognition that the invitation area punches above its weight in having some of the best and brightest academic research, cutting edge advanced manufacturing and materials and world-class learning opportunities, together with a national and international leisure offer which is second to none, is balanced against the restraints we encounter in respect of funding for SEND, temporary accommodation and infrastructure investment. Newcastle's highly innovative town centre regeneration plans stand as an example of our strength of working across the public and private sectors to bring about generational change. We have the will to do more, faster.

Newcastle-under-Lyme, and the wider Staffordshire area, has a strong ethos of, and is recognised for, effective partnership working with the public, private, third and academic sectors. In this, we have collectively fostered an agile and 'can do' approach from community safety to regeneration. In the establishment of new council structures, we must therefore ensure that we are not reductive – that is, taking existing structures delivered at appropriate scales and fitting them into new structures which may be less effective in obtaining outcomes for our residents, or creating in-built inefficiency. We support the goal set out in the White Paper to identify opportunities to deliver public service reform, including where they will lead to better value for money.

With this goal, we believe that – as we currently work – shared services where they make sense above individual unitary councils should be explored for joining up areas including data, waste treatment, net zero ambitions, energy supply, smart systems and processes to maximise efficiency. This is separate to the manageable geography of a council area but must be built into future service design.

We recognise the challenge in a counterfactual approach of 'do nothing'. Our case is not that there is no change needed, but rather that change is best delivered at the local level – our case sets out the four locally-focused unitaries, which we believe can best deliver that change. Within the existing boundary of Newcastle-under-Lyme, we can build on the successful One Council programme of transformation, which continues to deliver transformation opportunities in commercial, sustainable and digital change.

By contrast, the move to remote, larger, less accountable authorities risks reinforcing a distance from our communities' needs, decisions made focused only on what is expedient for the council, not for those it serves.

There is well-publicised evidence, including by the DCN, which challenges the rationale for a population-based approach to reorganisation, moving away from local accountability. By contrast,

there remains virtually no evidence as to how any financial savings will be achieved through such a move.

Our case sets out a 'balanced scorecard' across the Government's LGR criteria, recognising that no submission will exactly match these. But it does more – it speaks to a case which sets local identity, history and tradition alongside future innovation and efficiency. Most importantly, the case echoes the views of those we serve – with a strong level of support from our community and our elected members.

2.2 Our vision for LGR

If we are forced to reorganise, we will look to do so in a way that centres on the most important aspect of all local authorities – the community we serve. Our vision is one where our connected services, delivery at the appropriate scale and accessibility of councillors is at the heart of any new unitary authority. We believe that the prize of any reorganisation is to deliver the highest-quality levels of service delivery to our residents, businesses and visitors.

In our Interim Plan we stated that Newcastle-under-Lyme is a place with room to grow. We have a clear spatial vision as set out in our Local Plan (currently under final stages of examination) to sustainably develop great places to live, work and spend leisure time. We are the only authority in Staffordshire and Stoke-on-Trent with such an up-to-date plan for development of quality housing, key economic and business infrastructure and protection and development of green space.

In developing our vision, we have listened to the views of stakeholders. We will be a strong and supportive partner in the delivery of objectives of our key stakeholders – from strengthening the innovation offer at Keele University to supporting the Police in delivering their fight against crime and anti-social behaviour, to recognising that 'acting local' is a strength for our voluntary sector.

We see two key opportunities in consideration of an MSA area, on the footprint of at least Staffordshire and Stoke-on-Trent. Firstly, to increase the reach and influence of our great academic institutions across the whole region, with a route to effective and consistent funding without time- and-resource consuming competitive processes, and secondly, to develop efficient and effective shared services where it is useful to do so, to avoid unnecessary costs and join up delivery in a meaningful way. More detail of these plans is set out later in this business case.

3. Our approach

3.1. The Staffordshire context

Staffordshire is a county of distinct contrasts between its more rural and urban areas, with significant levels of deprivation in the latter, with these more urban and deprived areas forming comparatively small clusters across the county.

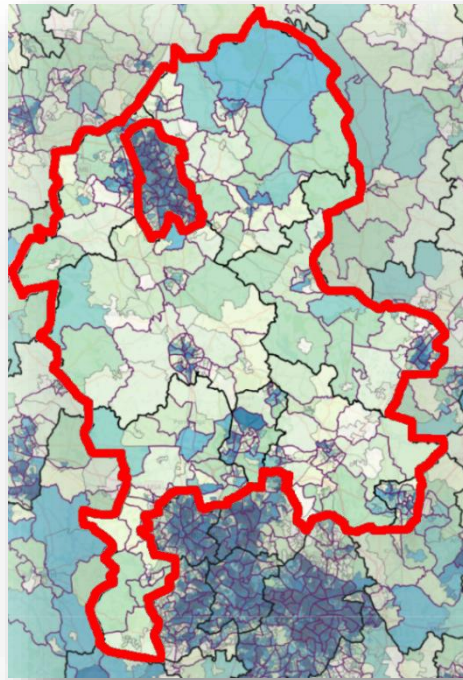


Figure 1: map of LSOAs shaded by IMD decile, with Staffordshire County Council and Stoke-on-Trent City Council boundaries in red²

- Staffordshire has multiple pockets of deprivation, notably in the more urban centres of Stafford, Newcastle-under-Lyme, Cannock, Tamworth, and Burton upon Trent
- These pockets of deprivation are surrounded by the more rural areas that are on average less deprived than areas nationally. 36% of LSOAs in Staffordshire are in the 50% of most deprived areas nationally, and 64% are from the 50% least deprived LSOAs nationally
- As LSOAs are indexed to cover a similar number of households, this suggests that Staffordshire has a deprivation profile that is less deprived than the national average. Despite this there are still notable pockets of deprivation that may require targeted, tailored support from local authority services or risk growing inequity

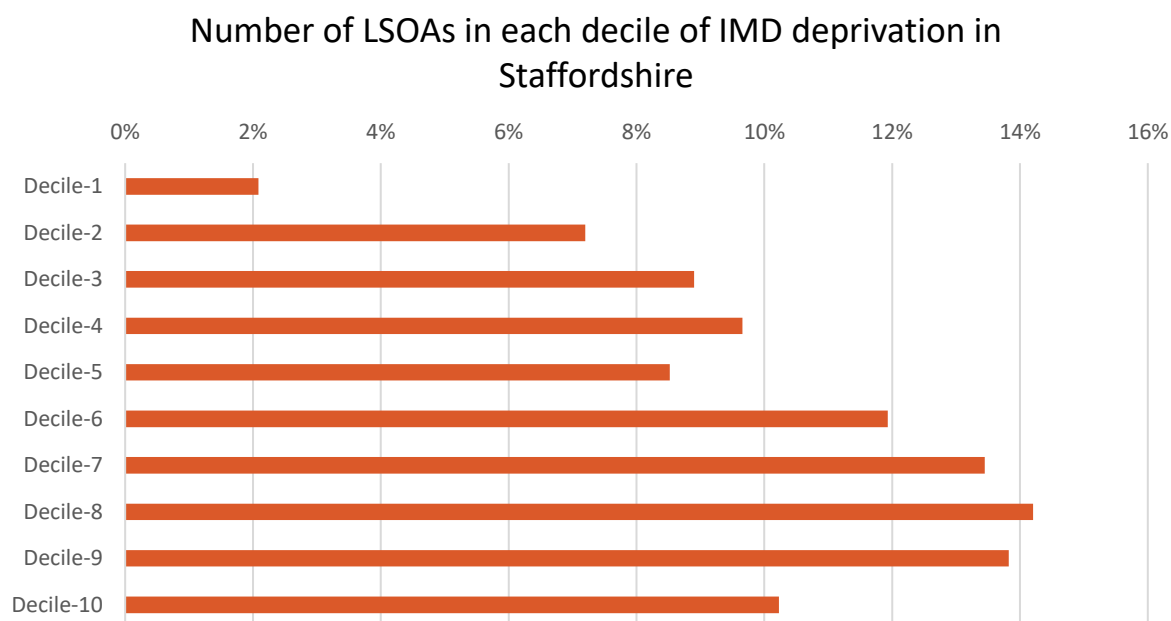


Figure 2: LSOA analysis of IMD demonstrating variable deprivation across Staffordshire

The notable exception to this is Stoke-on-Trent which is the only current unitary council in the county and the single most deprived and financially challenged area. The future location of Stoke-on-Trent in the context of local government reorganisation will have a significant impact on the financial feasibility of **any** proposal for Staffordshire. It is also the population placeholder that is likely to cause imbalance between any proposed future structures for local government in Staffordshire.

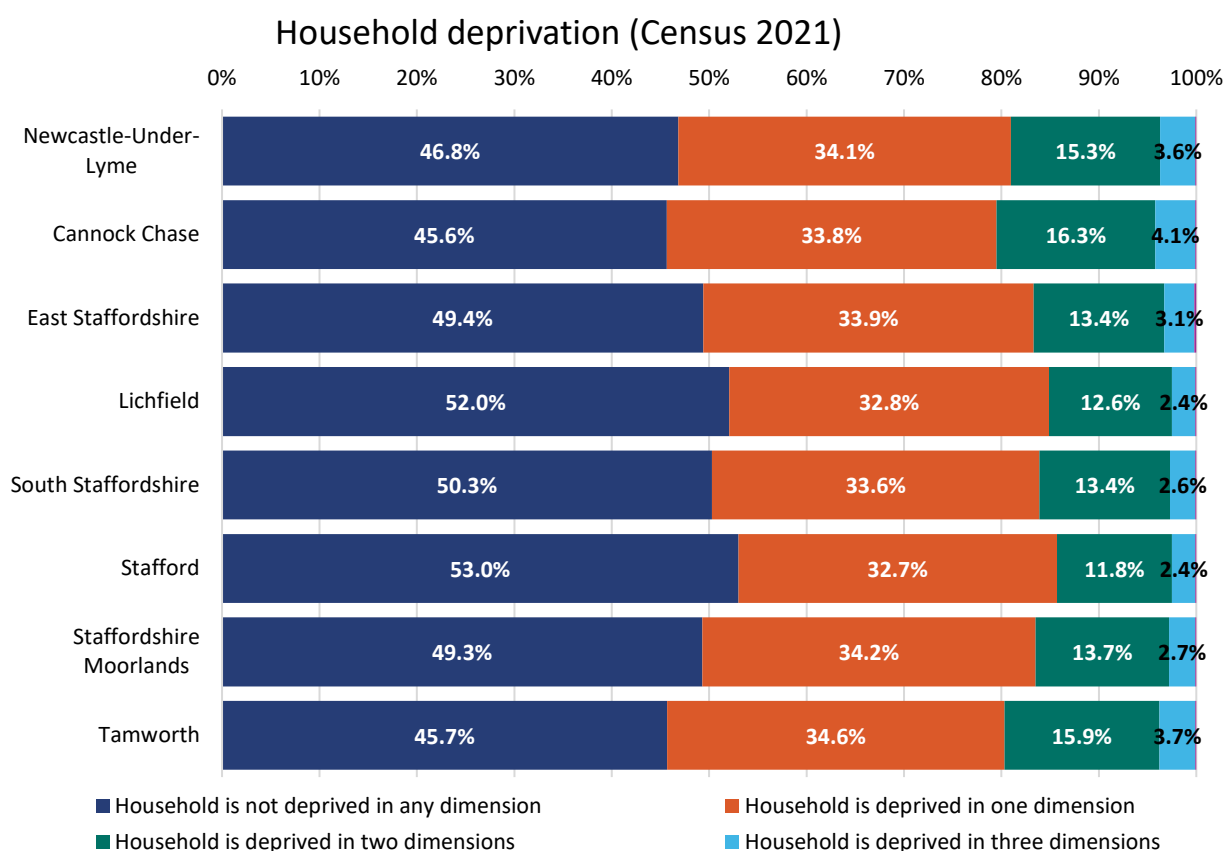
Outside of Stoke-on-Trent, a more focused analysis of the data clearly shows that there is some level of comparability in the levels of deprivation across many of the existing district and borough councils within the county, with some exceptions (e.g. Newcastle-under-Lyme; Cannock Chase). This relative uniformity may make it is feasible to balance the policy, outcome and financial impacts – as well as the policy and service considerations relating to them – across the proposed future structure of local government in the county. We will return to this theme later in our submission and argument for our preferred option.

The dimensions of deprivation used to classify households are based on four selected household characteristics.

- **Education:** a household is classified as deprived in the education dimension if no one has at least level 2 education and no one aged 16-18 years is a full-time student
- **Employment:** a household is classified as deprived in the employment dimension if any member, not a full-time student, is either unemployed or economically inactive due to long-term sickness or disability
- **Health:** a household is classified as deprived in the health dimension if any person in the household has general health that is bad or very bad, or is identified as disabled. People who have assessed their day-to-day activities as limited by long-term physical or mental health conditions or illnesses are considered disabled. This definition of a disabled person meets the harmonised standard for measuring disability and is in line with the Equality Act (2010)

- **Housing:** a household is classified as deprived in the housing dimension if the household's accommodation is either overcrowded, in a shared dwelling, or has no central heating

Figure 3: household deprivation by dimension³



In reviewing all of the area characteristics for the five options investigated, we have tested the hypothesis of equitably distributing the financial consequences of deprivation and its resulting high-cost demand for key services (see Financial case section). This illustrates that the most favourable configuration, if viewed only from a financial sustainability perspective, is an east-west configuration involving two new unitaries (the West Staffordshire model described in our Interim Plan). This might potentially allow for the challenging financial context of Stoke-on-Trent to be supported by the higher tax base (of the two new authorities) from both a residential and commercial perspective.

The financial sustainability argument for a West Staffordshire configuration can also be supported by a consideration of the transport infrastructure in the county and how this supports the functional economic geography of Staffordshire.

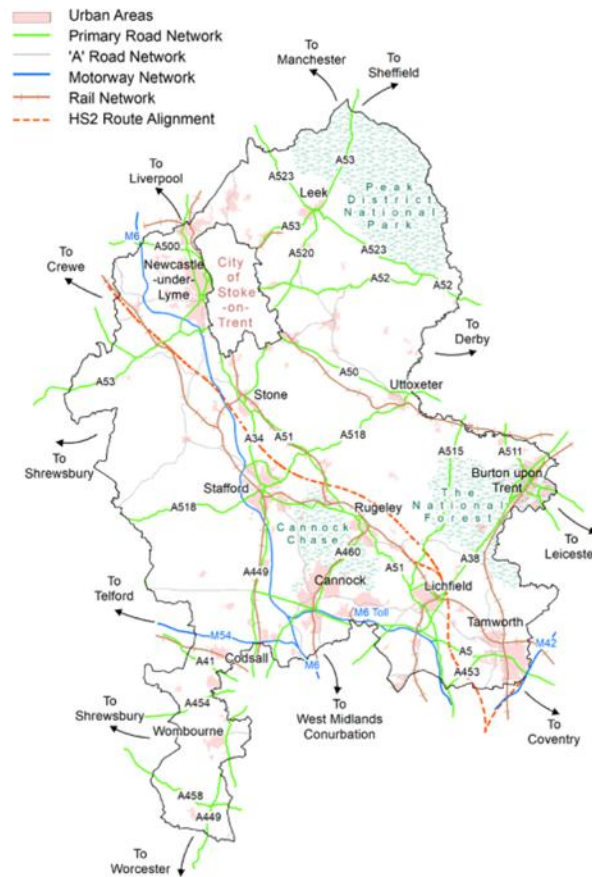


Figure 4: Staffordshire road network

When we look at the economic geography, the western part of the county (regardless of ultimate unitary arrangements) has strong transport, logistic and economic links with the West Midlands conurbation, economic and industrial geographies within it. Comprising the existing local authorities bordering the critical M6 corridor, the new authority could support the MSA in being a particular engine of economic growth and development. It also holds a cohesive geography of similar authorities in Staffordshire (see profiles above) and is aligned closely with many of the criteria for reorganisation set out by the government.

In the eastern area, the similarly aligned profile of demographics, deprivation and demand create a cohesive model and scale for a new unitary authority under the Government's criteria. It also provides, for the MSA, a partner that provides strong transport, logistics, tourism and cultural links with the East Midlands (e.g. Derby; Leicester) and the north (e.g. Peak District National Park; Sheffield).

The logic and evidence behind this proposed structure for Staffordshire appears to be recognised and acknowledged by other respondents to the reorganisation process. Staffordshire County Council, at their Cabinet meeting on 17th September 2025, elected to support an east-west configuration (including locating Stoke-on-Trent in the proposed eastern authority) and while Lichfield District Council have proposed a 3 unitary model, their submission adopts the east-west logic for the division of the southern area of the county.

However, crucially when we look at the Devolution and Reorganisation agenda we must consider the best opportunity to reimagine the way in which local government – and the wider public sector – identifies with, responds to and delivers on the needs of the communities and stakeholders that it serves. This is not to deliver larger, more remote local government but celebrate, strengthen and build on the 'local' aspect of our governance arrangements - that is the true prize of meaningful devolution.

As a result, the assessment of the evidence and development of options must be more than just a “high-level” process of responding to population estimates or even financial sustainability but also include a robust qualitative analysis of data at the most granular level. This is to assess whether the interests of communities are better served by challenging the apparent and easy options and instead presenting the argument for a compellingly local solution.

Newcastle-under-Lyme as a place and as a footprint for unitary local government represents just such a compelling solution. With a sustainable balance of demography, deprivation and demand the financial analysis shows that far from being immediately and dangerously unsustainable, it should in fact be deliverable.

This analysis chimes with the District Council’s Network’s (DCN) opinion that smaller, more agile councils closer to their communities and their needs may be more sustainable than “mega councils” in excess of the ~500,000 population, as per guidance initially provided by government and promulgated by the County Councils Network (CCN). It is also worth noting that the proposal to form a unitary council solely on the existing footprint of Newcastle-under-Lyme should not be discounted on the basis of population size as it is comparable to (or even exceeds) the population size of existing performant unitary authorities (e.g. Darlington; Hartlepool; Rutland).

It can be seen from the analysis below that from a policy and service delivery perspective, the balance required by the levels of deprivation in Newcastle-under-Lyme provide the imperative for being close to all communities and stakeholders to ensure the council is planning for, and delivering, service outcomes that are uniquely local and evidence based. This laser-like focus on local need, close-to-community decision making and tailored service delivery risks being lost in even the “balanced” east-west configuration which otherwise appears compelling at a high level of analysis.

IMD Profile of Staffordshire districts and boroughs

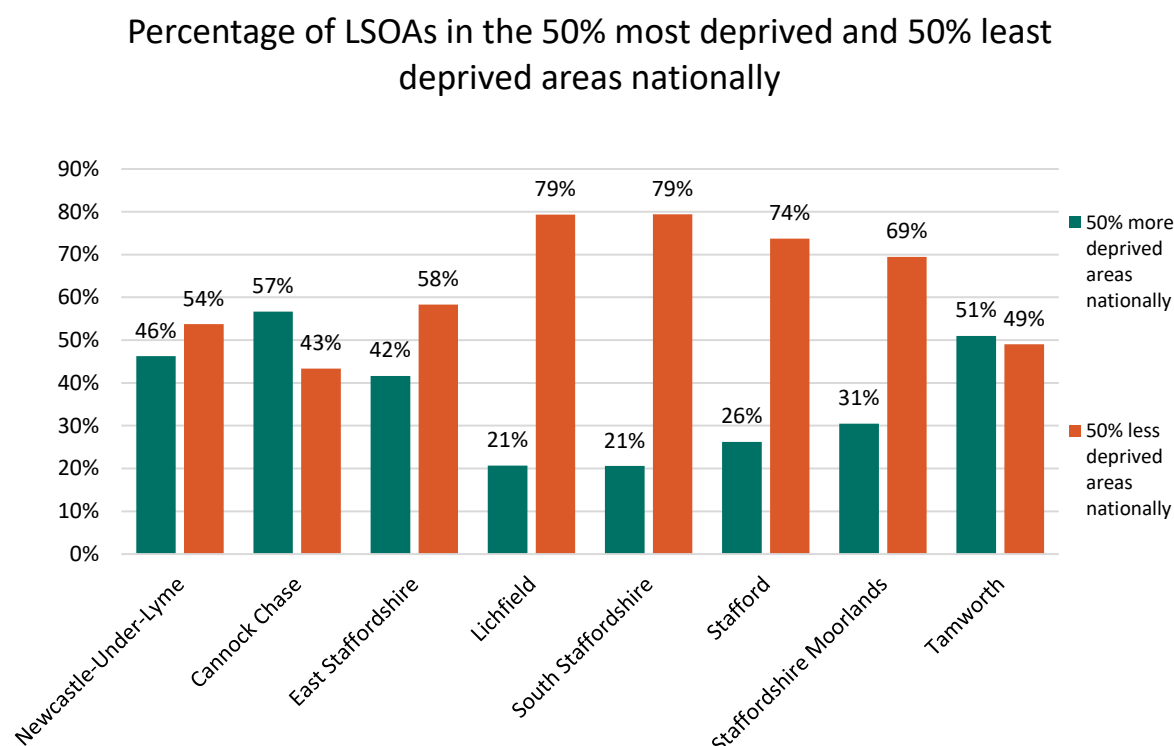


Figure 5: IMD profile of Staffordshire districts

- Newcastle-under-Lyme has pockets of higher-deprivation areas, as well as lower deprivation areas. This includes the most notable pockets of deprivation in the East, with Newcastle-under-Lyme and Kidsgrove, and areas of lower deprivation such as surrounding Keele and the more rural areas
- Figure 5 demonstrates that there is a sustainable balance of LSOAs in the 50% most and 50% least deprived areas nationally within Newcastle-under-Lyme, with 54% less deprived and 46% more deprived than the national median. While this represents a more deprived profile than across Staffordshire, as this is a less deprived profile than the national average, this may represent a sustainable balance of less deprived areas to support the pockets of deprivation present within Newcastle-under-Lyme
- Areas that are more deprived in Newcastle-under-Lyme are more commonly in the 20% to 40% of most deprived areas nationally. The related distribution profile also suggests less extremes on both the most deprived and least deprived areas, relative to national deprivation outcomes

Taking all of this into account, our approach to identifying and assessing options for local government reorganisation is to adopt both a wide and deep focus on the data and evidence. In doing so, we have used the criteria provided by Government and treat them as having no hierarchy or prioritisation. We have also augmented the six criteria with other factors that we consider critical in a robust and evidence-based decision-making process.

These criteria can be evidenced with narrative and data throughout this submission as follows:

Criterion	Links to relevant sections of the business case
Sensible geography / coherent places & identity	Vision and strategic objectives
Service delivery: high quality, sustainable services	Options appraisal Options comparison against government criteria Service delivery and ways of working Financial case
Financial sustainability	Financial case Risks and mitigations
Local accountability, democratic representation, local identity	Vision and strategic objectives Democracy Our plan for transition and implementation
Deliverability: implementation risk, transition planning	Our plan for transition and implementation Risks, dependencies and mitigations
Protecting or improving service equality, access	Service delivery and ways of working Our plan for transition and implementation Appendix 8: Equality Impact Assessment (EIA)
Beneficial outcomes (including economic growth, environment, climate, wellbeing)	Throughout, especially: Vision and strategic objectives Service delivery and ways of working Our plan for transition and implementation
Value for money vs cost burden (including one-off vs recurring costs)	Our approach Service delivery and ways of working Financial case Risks, dependencies and mitigations Appendix 2: detailed financial modelling outcomes
Alignment with national policy, devolution, statutory duties	Throughout, especially: Vision and strategic objectives Democracy

3.2. Our approach to options development & assessment

Newcastle-under-Lyme Borough Council has, since the English Devolution White Paper was launched by UK Government in December 2024, taken a strong stance that forced local government reorganisation presents a distraction both from the effective working of local authorities and from the goal – shared by all ten authorities in Staffordshire and Stoke-on-Trent – of meaningful and impactful devolution to the region. The Council remains of the view that reorganisation presents an

unknown cost, risk and challenge to the delivery of services to residents and businesses in Newcastle-under-Lyme.

In our Interim Proposal, we were clear that Newcastle-under-Lyme has a long and proud history, a forward-looking view of adaptation for the future and a strong sense of place, working alongside our neighbours. This assessment recognised that across our region, we will strive for and all gain from economic investment in our region at all scales – from local businesses starting up and growing across Staffordshire and Stoke and beyond, to established global advanced manufacturing and world class service industries, with innovative regenerators of our town and city centres together with cutting edge spin-outs from our great academic institutions – all have a part to play in attracting and retaining investment, and the higher-skilled, higher-paid jobs we all aspire to be available to those who live and work here.

With this in mind, we needed to be clear on and test a number of factors:

- A majority of support from our residents to move to a new structure of local government
- A balanced economy where places which invest and manage finances with strong fiduciary responsibility are not placed at disadvantage in ‘plugging gaps’ in areas which are struggling
- A level of governance which demonstrates the true objective of devolution – having decisions made at the most appropriate local level, closest to those the decisions will affect
- A geography which has meaning for investors, businesses, residents and anchor organisations (including coterminous delivery where this makes sense)
- A population size which could align to broader objectives but has a local rationale – not so distant as to be remote governance, not an arbitrary level which confuses geography and population
- A solution which will ensure that we continue to deliver quality services at the highest possible standard, not to the lowest common denominator or on a reduced basis to address historic financial troubles.

Since the preparation of our interim submission, there has been consensus across all parties within the council that the inclusion of a North Staffordshire model (comprising Newcastle, Staffordshire Moorlands and Stoke-on-Trent) should be rejected as an option for investigation.

What has changed?

Since the submission of an Interim Proposal in March 2025, and subsequent feedback from UK Government on 6th June 2025, there have been a number of changes to both the local and national context which have been included in considerations of the options for investigation. These include:

- The Government’s amendment of population size from 500,000 as a hard target to asking that final submissions set out a clear rationale for their selected population size;
- The experience of local government reorganisation submissions in Surrey on 9th May 2025 and those areas within the Devolution Priority Programme (DPP) which submitted on 26th September 2025 showed that a variety of models for LGR delivery could be brought forward for consideration by Government – with no area submitting a single submission for their invitational area;

- The election of a new Administration for Shropshire Council, who are taking the necessary time to consider options for LGR (being outside of an invitational area) and devolution arrangements;
- The declaration by Shropshire Council of a ‘financial emergency’ has been considered where information has been available in the modelling of options – at this time, the full impact cannot be fully modelled so is considered a risk;
- The election of a new Administration for Staffordshire County Council, which has reviewed the County Council’s previous position for a single unitary model and developed alternate options, including its preferred option of a two-unitary council model on a west-east footprint covering the whole of Staffordshire and Stoke-on-Trent. This model mirrors the west unitary option for investigation put forward by Newcastle-under-Lyme Borough Council in March 2025.
- The confirmation of its position by Staffordshire Moorlands District Council in favour of a North Staffordshire unitary authority comprising Newcastle-under-Lyme, Staffordshire Moorlands, Stoke-on-Trent and parts of the existing Stafford and East Staffordshire Borough Councils.

Modelling for a preferred option

The Council engaged respected consultants to work with the authority on developing a final submission and business case, including modelling of the five options for investigation and reviewing comparator data for models being considered across the invitation area.

This modelling responds to the criteria set out in the invitation letter of January 2025 (outlined in the above National and legal context section).

UK Government has confirmed that these criteria will not be weighted in their consideration of submissions, but the modelling also seeks to demonstrate – for each option – the financial impacts including a financial sustainability baseline; transformational and reorganisation benefits; and implementation costs.

The modelling also considers the number of times existing authorities are disaggregated; the complexity of disaggregation; the number of authorities being proposed; and the presence of continuing authorities.

Further detail, particularly about the financial sustainability analysis and the costs and benefits of reorganisation, can be found in later sections of this submission (see Financial case section, Appendix 1: financial model methodology).

Further considerations

In developing the options to be considered, the Council and its consultants have elected to follow the guidance of UK Government in a preferred approach of using existing district, borough and unitary council boundaries as the building blocks of reorganisation modelling.

Newcastle-under-Lyme Borough Council’s preferred options recognise that a range of public services are already delivered across a wide geography, and this will be further amended by the creation of, for example, new ICB geographies. The Council believes there are significant opportunities to reduce deficits and deliver more efficiently by implementing a ‘shared service first’ approach to those parts

of delivery which can best be delivered at scale, whilst retaining the local dimension for delivery at a local level to our residents and businesses. Examples of opportunities for shared service delivery include:

- Joint procurement of goods and services
- IT and digital delivery
- Using the Staffordshire Waste Partnership as a foundation for delivery of a single waste approach
- Joined up, intelligence-led and customer responsive regulatory services
- Strategic housing approaches to temporary accommodation
- Support functionality

These known areas of challenge provide an opportunity to reshape delivery in areas where councils (of any size) face national burdens, recruitment challenges and a lack of strategic scale.

3.3. Options appraisal

We believe that if local government reorganisation is to take place, a stand-alone unitary for Newcastle-under-Lyme is the best outcome for residents, businesses and stakeholders. This was clearly supported by analysis of public consultation (see Resident and stakeholder engagement section).

However, in the interests of testing this belief through a structured process we have identified five potential models that could potentially deliver an alternative, if less than optimal, outcome. These are:

1. A single unitary council based on the existing footprint of Newcastle-under-Lyme Borough Council (the preferred option of all parties in our Interim Plan)
2. The creation of a new unitary council across the existing geographies of neighbouring Newcastle-under-Lyme and Staffordshire Moorlands
3. The creation of a new 'West Staffordshire' unitary council based on a connected M6 corridor, comprising Newcastle-under-Lyme, Stafford, Cannock, South Staffordshire
4. The creation of a new unitary council comprising the existing unitary area of Shropshire and the existing borough geography of Newcastle-under-Lyme
5. The creation of a new unitary council on the footprint of the existing Staffordshire County Council

Option 1: a unitary authority for Newcastle-under-Lyme

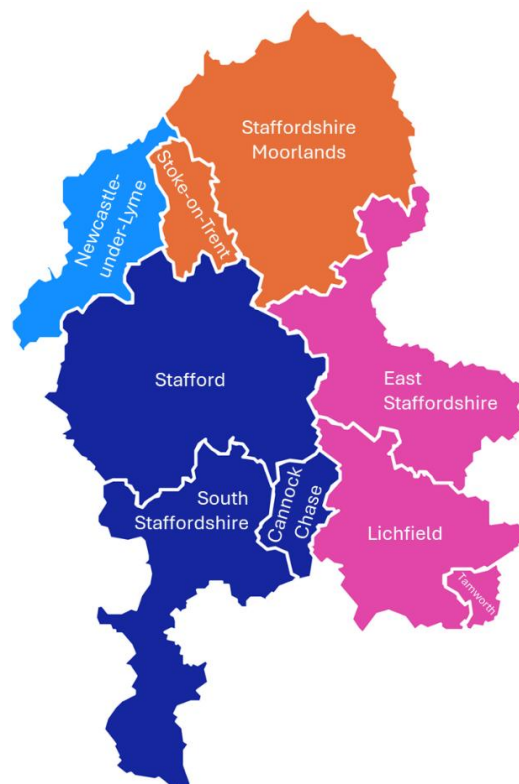


Figure 6: map of option 1

The considerations around this model included the minimisation of impact to existing residents and businesses within Newcastle-under-Lyme, the projected growing population of the geography (as quantified in the Newcastle-under-Lyme draft Local Plan, currently under examination), continuity of governance arrangements and public support.

It is recognised that the population size is some way below the indicative target population set out by Government, but exceeds that of numerous existing and well-functioning unitary councils in areas not subject to reorganisation (such as in Wales), not likely to be reorganised (including the Isle of Wight) or seeking to maintain their status in any reorganisation plans (such as Rutland).

Newcastle-under-Lyme is a cohesive geography, and one that reflects its strategic location, so that some of our communities naturally look to other places – from Mow Cop with its spilt conurbation between Newcastle and Cheshire East, to Madeley at the border with rural Shropshire and the Westlands bordering Stafford, with Wolstanton and May Bank bordering our neighbours in Stoke-on-Trent, our well-connected place can and should look to have a cohesion with not one geography but exploit and maximise each and every one of its economic links.

The existing footprint has many of the features of other, larger unitary councils, including one of the largest FE provisions in the region, strategic links by road to all parts of mainland Britain, a leading university, an abundance of protected green space, room for sustainable housing growth and infrastructure and governance at a sufficiently local level which would not require major upheaval.

Implementation of shared service arrangements would be essential under this model to reduce the structural shortfall for the new unitary over the early period of its existence.

This model also looks to accommodate (where not in direct conflict with stated aims of Council resolutions) meaningful geographies across the rest of the invitation area – i.e. the creation of a North Staffordshire authority for those authorities supportive of this model (Stoke-on-Trent and Staffordshire Moorlands), and matching geographies in the centre and south of Staffordshire), all with roughly equal populations.

The Newcastle-under-Lyme unitary council would be a continuing authority (a unitary borough council).

Option 2: a unitary authority across Newcastle-under-Lyme and Staffordshire Moorlands

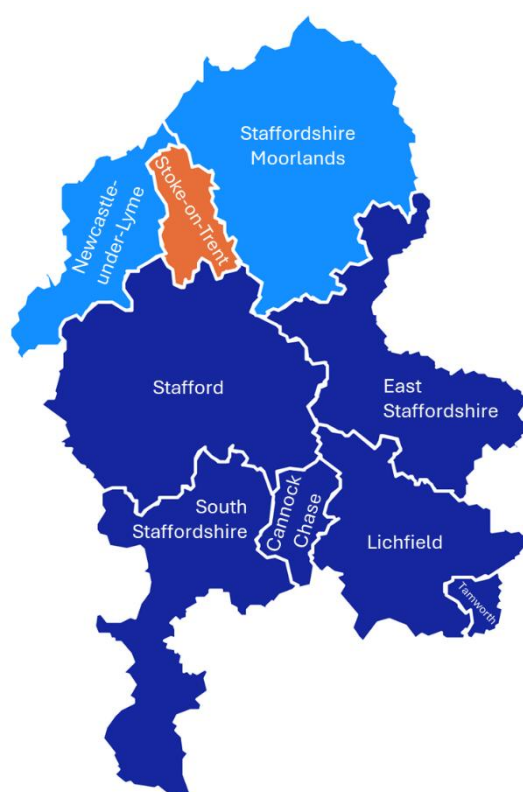


Figure 7: map of option 2

The model proposed to link Newcastle-under-Lyme with Staffordshire Moorlands focuses primarily on two factors – not burdening either existing authority area with the financial impacts of alignment with Stoke-on-Trent and a recognition of a commonality of population spread and geographic similarity, places of towns and rural villages which recognise and celebrate their size and scale, not to become city suburbs or infill.

Modelling shows a slightly smaller structural shortfall than option 1, based on the ability to introduce council tax harmonisation and economies of scale, however this is offset by the assumption that Stoke-on-Trent would be ‘islanded’, and the expectation of Government that failing unitary authorities will be supported through the reorganisation process. The model also shows a sizeable imbalance between authority populations across the invitation area.

Option 3: West and East Staffordshire authorities



Figure 8: map of option 3

The initial option for investigation set out in the Council's Interim Proposal in March 2025 was to look at a 'West Staffordshire' unitary authority to cover the geography of Newcastle-under-Lyme, Stafford, Cannock and South Staffordshire. For the purposes of modelling, an attendant 'east' authority area was set out as per Figure 8 above.

This model was subsequently endorsed by Staffordshire County Council in its Cabinet paper of September 2025. The model proposes two larger unitary authorities across the Staffordshire and Stoke-on-Trent geography, and in the case of a larger MSA area (to include Shropshire and Telford & Wrekin), would see the M6 corridor as the centre point of a new MSA.

The option would give strong initial financial stability for the West Staffordshire unitary council and deliver an option for Newcastle to be located within a more akin geography. However, neighbourhood governance arrangements would need to be put in place – potentially with some significant cost – to support local accountability, democracy and delivery.

This model also has potential as the basis of a shared services approach across wider geographies.

Option 4: a Newcastle-under-Lyme and Shropshire Unitary

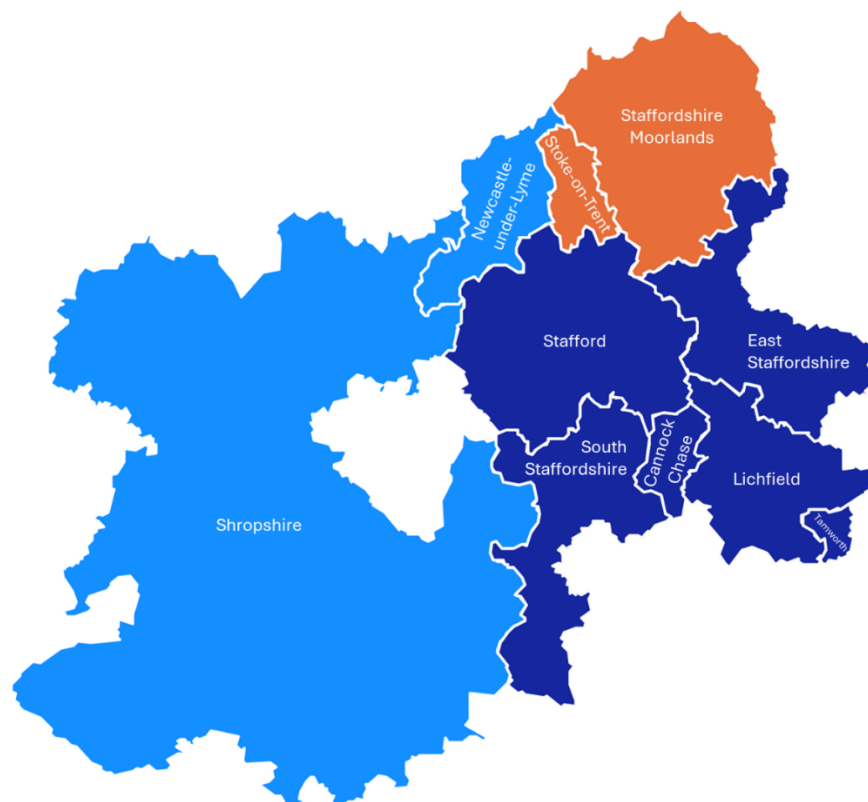


Figure 9: map of option 4

This model would give a close fit to the Government's initial target figure of 500,000 of population. Newcastle and the existing unitary council of Shropshire share a long border, extending to Shropshire addresses and postcodes for many residents in the west of Newcastle. Newcastle and Shropshire share a cohesive sense of place – historic market towns with an established and characteristic rural hinterland. The council would also incorporate two sides of the M6 corridor (as noted above) with onward links to the M54 corridor. This model would also fit alongside revised ICB arrangements for health but would require new legislation (currently being enacted) in respect of Police authorities.

Following the election of a new Administration at Shropshire Council, commitment to shared working remains uncertain and financial modelling has needed to acknowledge Shropshire's challenging financial position.

Option 5: a single unitary council on the existing footprint of Staffordshire County Council



Figure 10: map of option 5

This option was included following confirmation of Staffordshire County Council's interim submission in March 2025. Since that time, as noted above, the County Council has developed alternate options.

Whilst the single unitary council would have resilient finances and require limited disaggregation, the primary challenges lie with the remoteness from local accountability, the overall size (larger than nearly all existing unitary councils) and leaving Stoke-on-Trent islanded. For these reasons, the option is not being further investigated.

3.4. Options comparison against government criteria

Summary comparison of options considered, supported by the rest of the business case and detailed analysis in the appendices:

Government criteria	Strength/Weakness	Option 1 (preferred option)	Option 2	Option 3	Option 4	Option 5
Sustainable economic growth, housing and infrastructure	Strengths	- Protects existing plans, at different stages of the cycle, unique to each area - Existing strong performance across Staffordshire as per Housing Delivery Test - East/West focus on economic development to complement North/South infrastructure influenced by national policy	Various existing collaborations across the southern unitary	- East/West focus on economic development to complement North/South infrastructure influenced by national policy - Least, and most balanced, partners to coordinate regional activity and partnership working	Various existing collaborations across the southern unitary	Most conterminous boundaries with partners to coordinate activity
	Weaknesses	Greatest number of unitaries to coordinate regional activity and partnership working				
Unlocks devolution benefits	Strengths	Creates a devolved local region of unitary authorities	Creates a devolved local region of unitary authorities	Creates a devolved local region of unitary authorities	Creates a devolved local region of unitary authorities	- Creates a devolved local region of unitary authorities - Upper tier services benefit from continuity in the short-term and economies of scale in the long-term
	Weaknesses	Challenging to achieve balanced MSA partners in terms of size	Challenging to achieve balanced MSA partners in terms of size	Challenging to achieve balanced MSA partners in terms of size	- Predicated on inclusion of Shropshire and Telford & Wrekin in MSA area - Challenging to achieve balanced MSA partners in terms of size	Challenging to achieve balanced MSA partners in terms of size
Empowers unique local identities and places	Strengths	- Strongly supported by residents in Newcastle-under-Lyme, with the rest of the geography supported by multiple authorities across the invite area - Supports the unique deprivation profiles across Staffordshire - Supports the wishes of a number of other proposals	- Some common characteristics across Newcastle-under-Lyme and Staffordshire Moorlands - Support for southern unitary supported by three authorities across the invite area	Supported by Staffordshire County Council	Could provide a stronger, more cohesive link around areas such as Market Drayton, similar features across rural and urban settings.	More challenging to take advantage of localised commissioning opportunities in care and schools
	Weaknesses		Differing local communities not fully recognised across a larger southern unitary authority	Differing local communities not fully recognised across larger east/west unitary authorities, but east/west community split is considered most compatible	- Requires changing historic ceremonial boundaries - Transition path, appetite/capacity for change unclear in light of ongoing financial difficulties at Shropshire	Limited support from authorities and residents

Government criteria	Strength/Weakness	Option 1 (Preferred Option)	Option 2	Option 3	Option 4	Option 5
Democratic accountability and representation	Strengths	Four unitary model maintains emphasis on local voice				- Includes a 'mega council' serving over 900K residents - Highly imbalanced MSA authorities
	Weaknesses	Higher likelihood of uneven representation across the MSA pending decisions of sovereign authorities	- Increased democratic representation above the baseline scenario would be required for effective representation - Limited opportunity for elected members to influence and affect change in the local communities	- Significantly increased democratic representation above the baseline scenario would be required for effective representation - Limited opportunity for Members to influence and affect change in the local communities	- Increased democratic representation above the baseline scenario would be required for effective representation - Limited opportunity for Members to influence and affect change in the local communities	Limited opportunity for effective local representation
High quality and sustainable services	Strengths	Four unitary model designed to facilitate localised services while capitalising on joint working where services most likely to benefit from scale	Localised services achievable if flexible policy and service models adopted	Localised services achievable if flexible policy and service models adopted	Localised services achievable if flexible policy and service models adopted	Tension between localised, flexible services and economies of scale
	Weaknesses	Newcastle-under-Lyme (unitary A) most reliant on joint working approaches across the MSA to withstand service demand shocks	Concentrated deprivation in the unchanged Stoke-on-Trent footprint	Supported by Staffordshire County Council, the current provider of all upper tier services in the two-tier areas	Inclusion and disruption to Shropshire, outside of the invite area	Concentrated deprivation in the unchanged Stoke-on-Trent footprint
Financial resilience	Strengths	- Medium <i>potential</i> for ongoing financial savings - Lowest council tax harmonisation challenge - More complex to disaggregate reserves and resources equitably	- Higher <i>potential</i> for ongoing financial savings - Does not burden new communities with financial pressures and debt accrued at Stoke-on-Trent	- Higher <i>potential</i> for ongoing financial savings - Balanced tax base and structural financial position - Resilient authorities able to withstand financial shocks - Likely more aligned service models and service harmonisation risks/costs	Higher <i>potential</i> for ongoing financial savings	- Higher <i>potential</i> for ongoing financial savings - Less disaggregation of high-cost services offers lower risk to change and ongoing financial sustainability
	Weaknesses	- Most reliant on joint working and collaboration across the MSA to capture financial benefits (which we believe should be exploited in any model) - Likely to deliver lowest ongoing savings (in exchange for greater local representation and local services)	- Does not address unsustainable demand at Stoke-on-Trent - Likely medium service harmonisation risks/costs	- Higher council tax harmonisation challenge - Likely medium service harmonisation risks/costs	- Moderate council tax harmonisation challenge - Likely higher service harmonisation risks/costs - Significant challenges around reserves available to fund change due to Shropshire's usable reserve levels	- Moderate council tax harmonisation challenge - Likely higher service harmonisation risks/costs

4. Our proposal for LGR

4.1. Summary of our proposal

Having considered the options and the evidence for each, our preferred option remains a stand-alone unitary council on the existing footprint of Newcastle-under-Lyme (**Unitary A**).

The process of identifying and considering the options has also resulted in our preferred option for the remainder of the invitation area. Specifically, further disaggregating the current Staffordshire County Council to create new unitary authorities described below (noting that Unitary A, Unitary B, Unitary C and Unitary D are *working titles*):

- **Unitary B:** a unitary authority for the existing authorities of Cannock Chase, South Staffordshire and Stafford
- **Unitary C:** a unitary authority for the existing authorities of Staffordshire Moorlands and the current unitary authority of Stoke-on-Trent
- **Unitary D:** a unitary authority for the current authorities of East Staffordshire, Lichfield and Tamworth

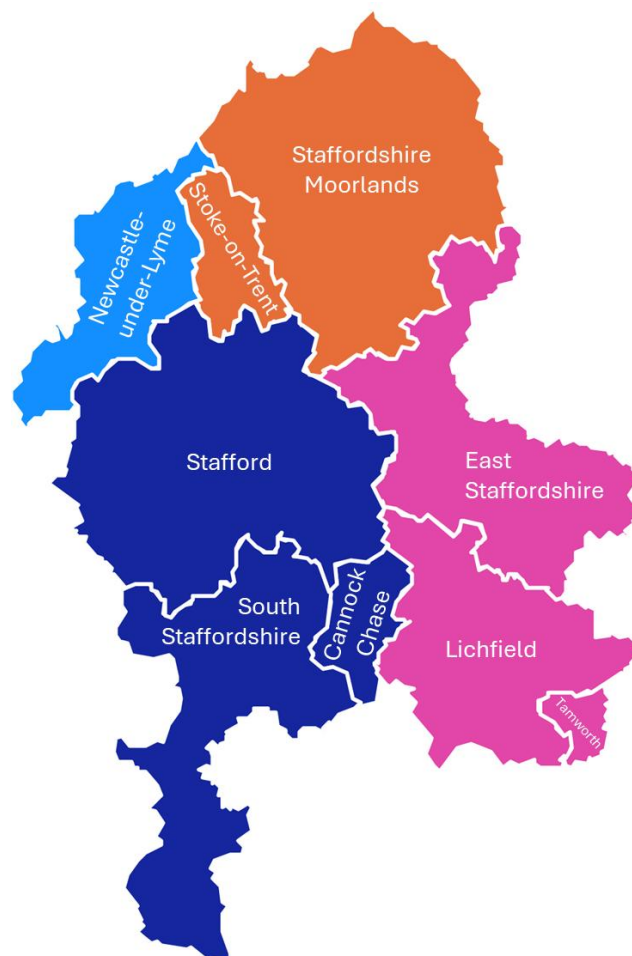


Figure 11: our proposal for Local Government Reorganisation (LGR)

4.2. Proposed council profiles

The following sections summarise the profiles of four new unitary authorities across the Staffordshire and Stoke-on-Trent area (with continued *working titles* of unitary A, B, C, D).

This summarises how authorities can benefit from strong inward connection through the region by building around a 'spine' of the M6 corridor and major rail lines⁴, where movement from north to south using key infrastructure already exists and is primarily influenced by national economic strategy. Authorities in an eastern/western configuration are better positioned to strengthen outward-looking relationships and regional interdependencies with Shropshire and Derbyshire.

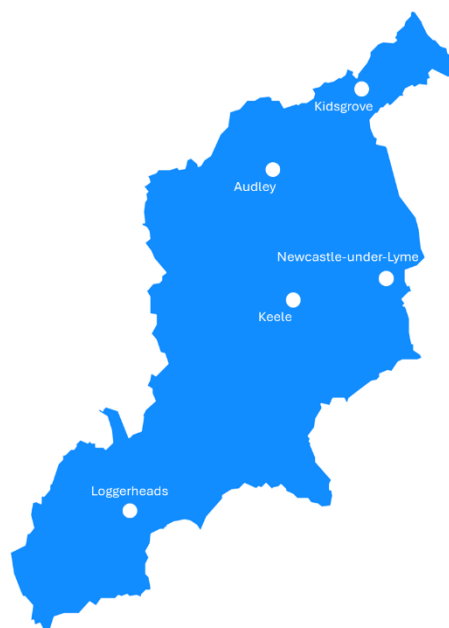
Unitary A

Geography

A unitary council, operating on the footprint of the existing Newcastle-under-Lyme Borough Council, serving a population of ~128,000, with planned growth to 137,500 by 2040.

Various road links exist into Stoke-on-Trent but the geography is a unique split of urban, semi-urban and rural areas that the existing Borough Council is adept at navigating and tailoring services to accommodate.

There are strong connections into the M6 corridor with the A500 connecting to Crewe, with opportunities to focus on improving connectivity to the west and northwest.



People, place and services

- There is a clear vision for residents and wider economic development, driven by our economic strategy and investment plans, including the Ceramic Valley Enterprise Zone and the Newcastle Business Improvement District
- Home to one of the UK's leading universities, Keele University, alongside the OFSTED outstanding Newcastle & Stafford Colleges Group. These institutions are the anchor for prosperity in the region, thorough innovative regeneration and business enterprise
- Collaborative services are proposed in a number of areas, to work not just across Staffordshire but any broader MSA, to pool key capabilities and deliver sustainable efficiencies. For example, in corporate services and waste management
- Potential to work to design and deliver localised interventions closer to communities, where services currently run at scale present opportunities. For example, tailored work with local schools to support SEND reform

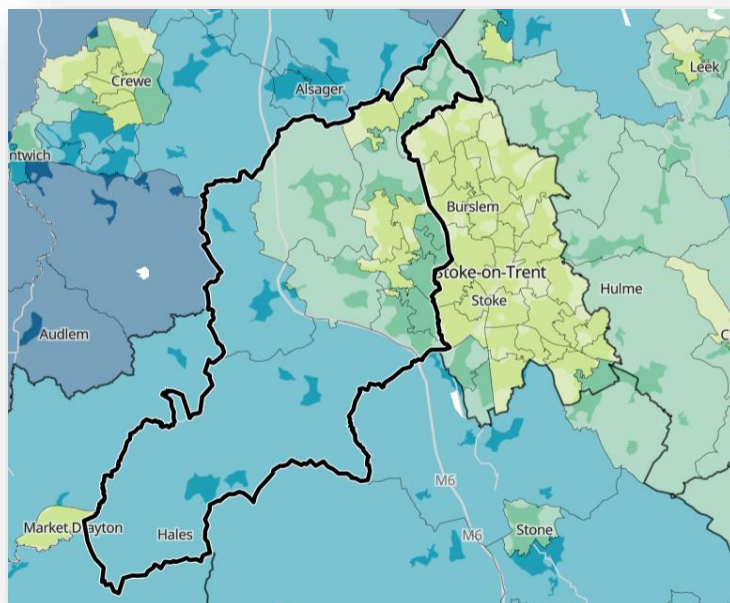


Figure 12: distribution of working adults over 16 years of age who work from home, where darker colours indicate higher prevalence of homeworking. Data shows a step change in behaviour in the north and south of the borough, across rural semi-urban and urban communities⁵

Governance and representation

Minimum Member representation of 30 Members is modelled as a baseline. This represents a Member to electorate ratio of ~3,000. However, it is noted that greater local representation will better serve local communities, in any authority in any proposed future for devolved local government. One of our key asks of Government is that it allows for the maintenance of current representation at a local level.

Finance, assets and resources

- There is no council tax harmonisation required in this authority
- Newcastle-under-Lyme currently holds no external debt but does have an increasing capital financing requirement, that will involve external debt in the near future (to mobilise an ambitious capital regeneration programme). Net investments and usable reserves held by Staffordshire County Council suggest it may be possible to offset this
- There are 10 parishes in the authority, all of which are precepting, and these charges will remain a local choice for these authorities
- Autonomy of the newly formed unitary would enable regional collaboration across the MSA in some services, alongside localised interventions in others, to maintain sustainable and high-quality services run at the right scale (see Service delivery and ways of working section)
- Operational infrastructure, such as the head office shared with Staffordshire County Council and the extensive assets to deliver in-house operational services, provide a platform for transformation to a unitary authority
- Opportunity to deliver housing and maintain a viable council tax base through the Local Plan, while recognising urban and rural sensitivities

- Like all authorities in all options, deeply collaborative working will be required across the region, particularly in disaggregated Staffordshire County Council services. This is not only to fully exploit benefits of the MSA but also to ensure service continuity. For example, analysis of asset GIA suggests relatively high care placement capacity within Stafford borough relative to other district and borough footprints

Summary against government criteria

Criterion	Assessment	Evidence
Sustainable economic growth, housing and infrastructure	Pass	An unique and autonomous area fit for the future, with an ambitious yet sensitive Local Development Plan expected to be adopted imminently
Unlocks devolution benefits	Pass	Removes two-tier structure within the geography with four partners, aligned to natural east/west geography, to represent local communities in the MSA
Empowers unique local identities and places	Pass	Responds to clear resident feedback on the preferred option and sense of local identity
Democratic accountability and representation	Pass	Minimum of 30 Members with an ask to government maintain greater local representation
High quality and sustainable services	Pass	Wide range of strong core performance metrics in borough services (see Service delivery and ways of working section), with localised interventions in Adults and Children's offering potential benefits (see Service delivery and ways of working section)
Financial resilience	Pass	Financial modelling indicates moderate but manageable financial pressure in the short-term, with sustainability in the medium-term and further potential to outperform historic council tax base expansion through the new Local Development Plan

Unitary B

Geography

A unitary council operating on the combined footprint of Stafford Borough Council, South Staffordshire Council, and Cannock Chase District Council, serving a population of ~360,000.

The area benefits from strategic transport links including the M6 corridor, A5 corridor, A518 and West Coast Main Line, connecting:

- Key employment sites throughout the authority across a diverse range of industries
- The western interface into Telford and Shrewsbury
- The southern interface into the West Midlands region, which is a common commuting pattern across the geography

The place encompasses a mix of market towns, villages, and green spaces with unique but complementary history and communities.



People, place and services

- Stafford hosts a campus of Staffordshire University, is home to further education provider NSCG's Stafford campus, and is a local hub for professional services
- Stafford Station Gateway regeneration project is an example of collaboration through west Staffordshire, working with private sector partners, Keele university and Newcastle and Stafford Colleges Group
- Initiatives through the south include i54 and the West Midlands Interchange
- There is a strong history of collaborative services between Stafford Borough Council and Cannock Chase District Council to build on including its senior leadership team, building control and streetscene

Governance and representation

Minimum Member representation of 48 Members is modelled as a baseline, based on two Members per current county electoral division in Staffordshire. This represents a Member to electorate ratio of ~5,500. However, it is noted that greater local representation will better serve local communities, in any authority in any proposed future for devolved local government. One of our key asks of Government is that it allows for the maintenance of current representation at a local level.

Finance, assets and resources

- Council tax harmonisation at South Staffordshire and Stafford is achievable in one cycle, with harmonisation across the whole area achievable in two cycles
- Significant net investments are held at Stafford with net borrowings at South Staffordshire and Cannock Chase of a similar magnitude to a disaggregated share of net investments held at Staffordshire County Council. This indicates a manageable debt position
- There are 75 parishes, 74 of which are precepting, and these charges will remain a local choice for these authorities
- Opportunity for regional collaborative working across the region, including Shropshire and Telford & Wrekin to the west border pending the final MSA composition
- Cannock Chase draft Local Plan is at examination stage and proposes over 5,800 homes, plus an additional 500 to meet needs arising on the wider Housing Market Area, offering a boost to the tax base in the short-term and beyond⁶

Summary against government criteria

Criterion	Assessment	Evidence
Sustainable economic growth, housing and infrastructure	Pass	Existing business enterprise initiatives, regeneration and events. Low barriers to housing throughout a large geographic region
Unlocks devolution benefits	Pass	Removes two-tier structure within the geography with four partners aligned to natural east/west geography to represent local communities in the MSA
Empowers unique local identities and places	Pass	After detailed engagement, this proposed authority is supported by South Staffordshire. Lichfield and Tamworth also support this model. Cannock Chase, East Staffordshire, Stafford and Staffordshire County Council all support a configuration which merges this area, inferring suitable recognition of unique identities and places.

Democratic accountability and representation	Pass	Minimum of 48 Members
High quality and sustainable services	Pass	Similar core performance across the current group in district services with limited outliers relative to the Staffordshire context (see Service delivery and ways of working section)
Financial resilience	Pass	Financial modelling indicates a sustainable authority in the short-term and medium-term, with significant usable reserves

Unitary C

Geography

A unitary council operating on the combined footprint of Stoke-on-Trent City Council and Staffordshire Moorlands District Council, serving a population of ~367,000.

Key roads such as the A50, A52 and A53 connect the geography from Stoke-on-Trent, through Staffordshire Moorlands to the east. Rural areas in the east of the geography meet the Peak District, creating a clear travel to work pattern towards a Stoke-on-Trent hub.

Major rail connections in Stoke-on-Trent provide north/south links with outward looking opportunities to strengthen services towards Sheffield and the Northeast (where services currently run via Uttoxeter and Derby).

Market towns and rural areas support a growing visitor economy.



People, place and services

- Barriers to housing in rural Staffordshire Moorlands and its agricultural heritage are complemented by significantly lower barriers within the Stoke-on-Trent city footprint
- Core performance analysis at district level demonstrates complementary performance, including strong performance at Stoke-on-Trent in development management and strong revenues collection in Staffordshire Moorlands, creating operational opportunities for best practice sharing (see Appendix 1: financial model methodology, part 4)
- Commuting patterns from mid-Staffordshire demonstrate Stoke-on-Trent's role as the economic hub of the region, with cross-boundary commuting inevitable in any local government configuration to be facilitated by the MSA
- The existing strategic alliance with High Peak at Staffordshire Moorlands is likely to present transformation complexity and longer timescales which would be exacerbated in a larger proposed footprint including further existing authorities

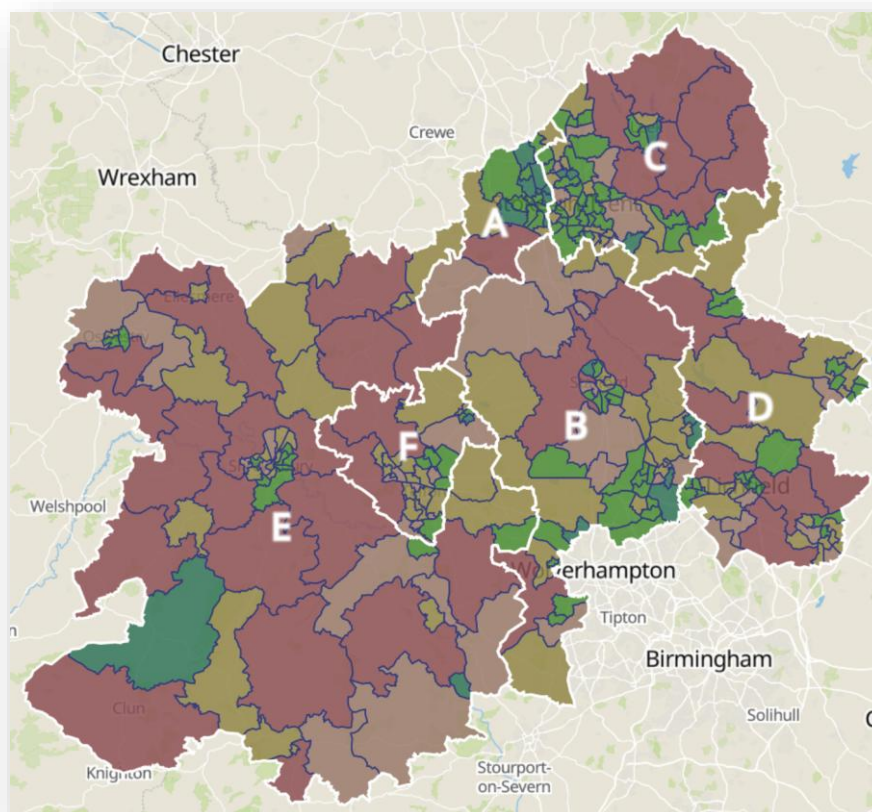


Figure 13: barriers to housing across proposed geographies, where green indicates low housing barriers and red indicates high housing barriers, including Shropshire (unitary E) and Telford & Wrekin (unitary F)

Governance and representation

Minimum Member representation of 47 Members is modelled as a baseline, based on two Members per current county electoral division in Staffordshire Moorlands geography, and adopting a consistent Member to electorate ratio in the Stoke-on-Trent geography. This represents a Member to electorate ratio of ~5,400. However, it is noted that greater local representation will better serve local communities, in any authority in any proposed future for devolved local government, noting Stoke-on-Trent City Council currently have 44 Members. One of our key asks of Government is that it allows for the maintenance of current representation at a local level.

Finance, assets and resources

- Council tax harmonisation across the whole area is achievable within two cycles. The current Band D charge at Staffordshire Moorlands is the third lowest of districts across Staffordshire and inclusion of further existing authorities is likely to create significant opportunity costs in terms of council tax foregone
- Significant debt at Stoke-on-Trent creates a challenge in any scenario. However, disaggregation of reserves on a population basis suggests around £210M in usable general, earmarked and capital reserves could be available to this proposed authority (based purely on disaggregation of Staffordshire County resources by population). However, more detailed reviews are recommended regarding equitable distribution of Staffordshire County Council's ~£500M usable reserves, noting Staffordshire County Council holds ~£50M in net

investments. This is in the context of ~£700M borrowing at Stoke-on-Trent, alongside potential strategic disposal options for £1,800M in long-term assets. A strategic asset disposal approach for assets across Stoke-on-Trent is also an option (similar to the approach at Woking to create a level playing field in Surrey⁷)

- There are 43 precepting parishes, all of which are within Staffordshire Moorlands, and these charges will remain a local choice for these authorities
- Adoption of new LDPs, estimated in 2027 and 2028 across the region, provide the key opportunity for development and expansion of the tax base to outperform the historic trend assumed in financial models and further improve the financial sustainability of this authority, which modelling suggests can already be sustainable in the medium-term
- There is a key opportunity for regional collaborative working including corporate services as set out elsewhere in this business case

Summary against government criteria

Criterion	Assessment	Evidence
Sustainable economic growth, housing and infrastructure	Pass	Stoke-on-Trent is an economic hub of the region, with balanced housing opportunities
Unlocks devolution benefits	Pass	Removes two-tier structure within the geography with four partners aligned to natural east/west geography to represent local communities in the MSA
Empowers unique local identities and places	Pass	All authorities in the region support a configuration which merges this area, inferring suitable recognition of unique identities and places.
Democratic accountability and representation	Pass	Minimum of 47 Members
High quality and sustainable services	Pass	Pockets of complementary best practice performance across existing authorities (see Service delivery and ways of working section)
Financial resilience	Pass	Financial modelling indicates sustainability in the medium-term, with significant opportunity to boost council tax and retained business rates funding beyond historical trends and detailed planning of existing resources required in any scenario

Unitary D

Geography

A unitary council operating on the combined footprint of East Staffordshire Borough Council, Lichfield District Council and Tamworth Borough Council, serving a population of ~323,000.

The M6 Toll and M42 support the southern interface links to the West Midlands, with strong economic and housing ties at conurbations around Lichfield and Tamworth. The A38 creates links from the M6 corridor, through Lichfield, Burton-on-Trent and eastwards to Derby. The Cross County Route also connects Tamworth and Burton upon Trent to the northeast.

In the north of the geography, infrastructure including the A50 and East Midlands Railway routes create direct links to Stoke-on-Trent, including at Uttoxeter and JCB's World HQ site in Rocester.



People, place and services

- Residents and businesses in the southeast have significant commuter patterns and interdependencies with the West Midlands region
- Significant regeneration in Tamworth, including the Future High Street, further supporting retail and leisure sectors
- East Staffordshire and Lichfield share a complementary mix of rural, agricultural and artistic heritage that supports a visitor economy
- Operationally, there is significant shared service delivery, particularly between Lichfield and Tamworth (including, for example, waste, recycling, building control). There are also complementary service delivery models (for example, all authorities have insourced street cleansing). This presents opportunities for smoother transformation relative to options that merge with authorities in the west

Governance and representation

Minimum Member representation of 44 Members is modelled as a baseline, based on two Members per current county electoral division in Staffordshire. This represents a Member to electorate ratio of ~5,300. However, it is noted that greater local representation will better serve local communities, in any authority in any proposed future for devolved local government. One of our key asks of Government is that it allows for the maintenance of current representation at a local level.

Finance, assets and resources

- Council tax harmonisation across the region is achievable within one cycle, with very low opportunity cost (less than £18 difference between the highest and lowest combined upper tier and lower tier council tax charges for existing authorities)

- There are highly consistent levels of current debt/investments and reserves per head of capita. These levels are equitable and provide a foundation for both transformation and long-term sustainability
- There are 67 parishes, 58 of which are precepting. This includes six parishes grouped into three pairs. These charges will remain a local choice for these authorities
- Opportunity for regional collaborative working across the region, pending the final MSA composition

Summary against government criteria

Criterion	Assessment	Evidence
Sustainable economic growth, housing and infrastructure	Pass	Complementary places with existing regeneration and economic development plans delivering benefits within the authority and strengthening relationships with the West Midlands
Unlocks devolution benefits	Pass	Removes two-tier structure within the geography with four partners aligned to natural east/west geography to represent local communities in the MSA
Empowers unique local identities and places	Pass	After detailed engagement, this proposed authority is supported by Lichfield and Tamworth. South Staffordshire also supports this model. Cannock Chase, East Staffordshire, Stafford and Staffordshire County Council all support a configuration which merges this area, inferring suitable recognition of unique identities and places.
Democratic accountability and representation	Pass	Minimum of 44 Members
High quality and sustainable services	Pass	Complementary existing collaboration, service models and comparable core performance conducive to effective (and lower cost) service harmonisation (see Service delivery and ways of working section)
Financial resilience	Pass	Financial modelling indicates small but manageable financial pressures in the short-term and a strong sustainability in the medium-term

5. Resident and stakeholder engagement

Key criteria:

- *Reflects and empowers Staffordshire's unique local identities and places*
- *Provides strong democratic accountability, representation and community empowerment*
-

5.1 Introduction & approach

Since December 2024, the Council has engaged with key stakeholders in respect of the potential for shaping a meaningful local government geography. This engagement has taken place both through the Council's work directly, and in collaboration with other authorities across Staffordshire and Stoke-on-Trent, to reduce the consultation burden on residents and strategic partners and explore key themes in general as well as views on this proposed option.

Following receipt of the UK Government's response to Interim Proposals in June 2025, the Council has also carried out an online consultation with residents, businesses, and those who work in or visit Newcastle-under-Lyme/Staffordshire/Shropshire. This survey was designed to align to those run by neighbouring councils (Lichfield, Tamworth, Cannock Chase, East Staffordshire, Stafford Borough, South Staffordshire) to ensure a joined up approach.

The results and outputs from joint engagement sessions and focus groups, the online survey and focused stakeholder sessions are set out in Appendix 4: detailed engagement outputs and analysis.

5.2 Reach

Newcastle-under-Lyme Borough Council worked with all local authorities in Staffordshire and Stoke-on-Trent on an initial stakeholder engagement process. The key outcomes from this were:

- **Organisational stakeholders / partners:** 22 joint engagement sessions were held with stakeholders in health, emergency services, education, voluntary sector, businesses, and some of Staffordshire's MPs. These provided an introduction to LGR and devolution, and captured views around current services, efficiencies, community links and partnership working
- **Residents:** focus groups were held by the County Council with residents across the county discussing local identity, council structure and community priorities in Newcastle-under-Lyme and Staffordshire

In addition, we have held a number of sessions with key stakeholders on our proposed options, together with an online survey to businesses, service users, residents and interested parties in Staffordshire and Stoke-on-Trent, asking them to set out what is important to them in the future:

- **Organisational stakeholders / partners:** the Council carried out further focused stakeholder sessions with 9 partner organisations (across education, health, emergency services,

housing, the voluntary sector, businesses) to discuss the preferred options and considerations for implementation

- **Residents:** the online survey received 1,380 responses between 18 August and 16 September, with 95% of these responses from residents of Newcastle-under-Lyme. Social media posts promoted the online survey with a sponsored advert. This received 6,590 reach/views, 8,877 impressions and 212 link clicks

5.3 Residents: engagement summary and findings

The County Council held a focus group in each of the boroughs and districts of Staffordshire. In the session made up of Newcastle-under-Lyme residents, participants discussed general views around reorganisation and expressed concerns about the general decline of opportunities within towns, the potential impact of council restructuring (such as moving toward unitary authorities), and the importance of maintaining local accountability, quality of services, and community engagement. The group also debated the pros and cons of having one versus multiple councils, highlighting issues like funding, local relevance, and the risk of losing local knowledge.

More specific feedback around Local Government Reorganisation (LGR) and proposed options if this were to go ahead were captured through the online survey. 76% of respondents were very concerned about LGR and only 6% were very confident that LGR could continue to provide good public services that last and meet their needs. This shows just how concerned residents are about reorganisation.

Their main fears focused on financial risk, loss of local control, and deteriorating service quality, particularly if merged with Stoke-on-Trent. Opportunities were acknowledged but seen as conditional and largely dependent on retaining Newcastle-under-Lyme's independence. The dominant sentiment was risk-averse, with any potential benefits needing clear, local accountability and safeguards to be credible.

When asked to select their preferred option, **59% of the respondents preferred a unitary council based on the existing borders of Newcastle-under-Lyme**, meeting a key factor set out in our Interim Proposal for 'a majority of support from our residents to move to a new structure of local government'. This has bolstered our belief that our preferred option is the right one for our residents.

From the online survey, the top four priorities for a new council were:

- Keeping services that are based on local need
- Having local councillors who are close to local issues
- Saving money while keeping local services running smoothly
- Keeping what makes our area special

The top four most important themes to how services are delivered were:

- Improved infrastructure (roads, health and schools)
- Able to change to fit what local people need
- Value for money
- Delivered local

5.4 Organisational stakeholders: engagement summary and findings

In addition to the joint stakeholder sessions led by the County Council, Newcastle-under-Lyme Borough Council engaged further stakeholders across education, emergency services, the voluntary sector, housing, and local business to gather feedback on a proposal to form a single unitary council for the borough. The engagement aimed to identify strengths, risks, and considerations for proposed LGR.

Key themes

Three key themes emerged from this engagement and our response to these is provided below as well as a summary of the feedback from each sector. Full details are included in Appendix 4: detailed engagement outputs and analysis.

Table 1: key themes from stakeholder engagement

Key theme	Our response
Local identity vs. strategic capacity While local engagement and responsiveness are valued, there was concern that a single unitary authority may lack the scale for effective strategic delivery.	Our proposal ensures that Newcastle-under-Lyme retains local representation and focus for residents while providing for a strong representation of interests and issues within the broader Mayoral Strategic Authority (MSA). We also believe that many of the issues that have been highlighted as potential concerns by stakeholders relate to the areas of responsibility for coordination (by the MSA) across the region, e.g. public health & safety; economic development; transport infrastructure. We are clear that local accountability and effective representation at and through the MSA will allow us to strike the optimum balance between “responsive to local needs” and “effectively operating at scale”.
Need for collaboration Cross-boundary partnerships and clear governance structures were repeatedly emphasised as essential for successful transition to a new model.	Our proposal explores opportunities for deeper collaboration in the MSA context, particularly where regional roles and responsibilities are at play and/or services can be shared and/or delivered at regional scale (see Service delivery and ways of working section)
Communication and transition planning Transparent communication and careful planning to understand impacts are critical to mitigate risks and support stakeholders through any change.	Our proposal includes detailed implementation, communications and stakeholder plans which have been built on feedback we have heard from stakeholders (see Our plan for transition and implementation section and Risks, dependencies and mitigations section)

Sectors

Education sector

The education sector supports strengthening local identity and education pathways but has concerns that a single unitary authority is too small for effective strategic delivery. Risks may include fragmentation, reduced capacity, and diminished influence compared to larger regional structures. The sector advocates for the MSA model, robust cross-boundary partnerships, and ongoing data gathering to inform decisions, emphasising the need for a footprint larger than a single district.

Emergency services

Emergency services value the potential for more responsive, community-focused delivery under the proposed model but have concerns about the potential for increased complexity, resource stretch, and fragmentation. These issues could undermine safeguarding and emergency response. The sector stresses the importance of clear governance, robust cross-boundary collaboration, and careful planning to avoid duplication, confusion, and gaps in service delivery. In a policing context, it was noted that being aligned with Stoke-on-Trent brings a range of differing and greater resource requirements and challenges to those of other parts of the county.

Housing

The housing sector values its partnership with the council and sees benefits in a locally focused authority, allowing for more tailored services and stronger community impact. However, there are concerns about potential gaps in experience if the council transitions to unitary status, as well as the risk of missing strategic opportunities available at a larger scale. Clear communication and open dialogue are emphasised for managing the transition.

Local businesses

Local businesses strongly favour retaining the current two-tier structure, valuing direct access to council services and established relationships. They fear that a larger unitary authority could dilute Newcastle-under-Lyme's identity, introduce bureaucracy, and threaten recent successes in funding and town centre improvements. If change is unavoidable, they prefer Newcastle-under-Lyme's proposed option of a unitary authority based on the existing footprint to maintain continuity and minimise disruption.

Voluntary sector

The voluntary sector sees the proposal's strength in maintaining strong local engagement but is concerned that Newcastle-under-Lyme could be overshadowed by larger neighbours, impacting investment and influence. The sector is interested in exploring cross-unitary partnerships to ensure a strong regional approach for Staffordshire.

6. Service delivery and ways of working

Key criteria:

- *Supports sustainable economic growth, housing and infrastructure delivery*
- *Unlocks the full benefits of devolution*
- *Delivers high-quality, innovative and sustainable public services that are responsive to local need and enable wider public sector reform*

6.1. Leveraging the MSA

We want to see tangible and sustained economic growth that improves living standards where it counts – in our cities, our towns and our villages – the places where people live. Serving over 1.1 million residents across the county and city, the Staffordshire Leaders Board (a joint committee) is already hard at work delivering on Staffordshire and Stoke-on-Trent’s extraordinary economic and place potential.

Since the Leaders Board was established in 2022, we've been exploring how devolution can benefit the area as one of our key priorities. We are committed to this collaborative effort and are ready to work with Government to do more. Our approach is based on four core principles:

1. **Devolution must work for all:** plans must reflect and respond to a deep understanding of local needs and opportunities. That is what our authorities have been working hard at over the summer
2. **Form must follow function:** if we are to accept another layer of governance in the county, at additional cost to the people of Staffordshire and Stoke-on-Trent, then the prize in terms of devolved functions, powers and resources has to be significant
3. **Governance has to be inclusive:** our Leaders Board works because all local authorities get to participate and contribute, and we want to ensure that this is also the case in any devolved arrangements
4. **Commitment to subsidiarity:** devolution should be to the most appropriate level of governance for the function in any question, and that should mean a combination of county-wide, local authority level and, perhaps most importantly, community level. We seek a devolution deal that gives us flexibility to make those judgements together

Building on this, and over the summer months as we have developed this submission, we have thought through our opportunities and our asks. We believe that these fall under the following main themes:

- Economic development
- Skills
- Energy and environment
- Transport
- Housing and regeneration

This work has influenced the views and opinions that are expressed in this submission as well as the wider narrative for Newcastle-under-Lyme's view of both devolution and local government reorganisation. However, it is important for government, and our potential partners in this process, to clearly understand that we reserve our position on the preferred model of devolution until we have seen the promised devolution framework and guidance.

Notwithstanding this, we do welcome your ongoing commitment to flexibility on the governance arrangements for devolved powers. Most significantly, whilst there are benefits to elected mayors for some areas, we do not currently believe that this is a model which is right for Newcastle-under-Lyme or suitable for Staffordshire more widely.

We will now await the further Government guidance so that we can continue to develop our collective position, working closely with you and your officials.

6.2. Core services: context and current performance

Newcastle-under-Lyme's vision for our future, and the future across Staffordshire and its MSA, is to continue providing quality services to the highest possible standard. We are keen to recognise the balance between:

- Opportunities for deeper collaboration in the MSA context, particularly where services can be standardised or delivered at regional scale
- Localised approaches that offer better value for money, including targeted prevention or delivering discretionary services different communities need.

In both of these scenarios, there are risks that existing arrangements could be negatively impacted as well as situations where existing arrangements are particularly conducive to successful reorganisation.

To support this analysis, we have gathered publicly available information on the current structure of local government in Staffordshire, and this can be found in Appendix 3: background information on service delivery. Analysis of core performance is also in Appendix 1: financial model methodology, part 4.

As a general note, and before moving into the more detailed analysis, we need to explicitly consider the current shared service/delivery arrangements between Staffordshire Moorlands and High Peak councils. As these two authorities are in separate areas and will be impacted by their own devolution and reorganisation contexts, we have assumed that the shared arrangements will require unpicking because of the changes in each respective submission area. On this basis, our treatment of Staffordshire Moorlands District Council in this submission is as a stand-alone local authority.

There is also a large-scale shared service/delivery relationship between Stafford Borough Council and Cannock Chase District Council. We will reference this in the specific sections below where necessary, but it should be noted that these two authorities are proposed to be part of the same future unitary council (Unitary B). In our view, this creates an important strategic building block that can be leveraged through the reorganisation process to potentially reduce costs and complexity and speed transition.

High level service delivery models have been considered in higher impact services (in terms of current cost and potential opportunity unlocked by LGR) in the following sections, recognising that final decisions will be subject to the Structural Changes Order, role of the MSA and local democratic choice.

6.3. District and borough services

Services delivered through existing district and borough councils have a huge impact on the daily lives of our residents and communities.

Analysis of core lower tier service areas demonstrates that districts within Staffordshire perform significantly above average, as do Shropshire and Telford & Wrekin. It also demonstrates the strong performance of Newcastle-under-Lyme within this Staffordshire context:

Table 2: service performance summary

Service	Performance metric	Newcastle-under-Lyme performance	Better or worse than national median?	Newcastle-under-Lyme rank across Staffordshire districts and Stoke-on-Trent 1=best 9=worst
Planning	Planning composite: % of major planning applications decided in time (minor, major, other) and % appeals dismissed	91.9%	Better	4
Housing benefits	Time taken to process housing benefit new claims and change in circumstances (annual)	4 days	Better	2
Revenues	Revenues composite: NDR and council tax collection broken down by collection status (%)	97.3%	Better	7
Waste, recycling and street cleansing	Residual household waste per household (annual)	428.5kg	Better	2
Housing and homelessness	Number of households living in temporary accommodation per 1,000 households	0.45	Better	5
Corporate	Complaints composite: No. of upheld Ombudsman complaints per 10,000 resident population	0.26	Better	1

LGR presents an opportunity to strengthen these services by moving towards best practice of each of its current constituent authorities and beyond. Detailed performance and net expenditure insights are included in Appendix 1: financial model methodology, part 4. This analysis suggests services currently delivered at district/borough level operate within different contexts and with varying value for money. This is alongside different stages of service development, transformation, return on investment and strategic choice. For example, Newcastle-under-Lyme is the only authority currently collecting food waste and makes a discretionary choice to prioritise economic development. Harmonising services and historic choices present risks and potential further costs which cannot be fully quantified in the financial case at this stage.

Waste, recycling and streetscene

Waste, recycling and streetscene is considered a high impact area due to significant implications for assets, capital and revenue resources. Revenue Outturn for FY24/25 shows that the ten waste authorities in Staffordshire spent more than £50M last year in this area, plus £39M capital revenue

expenditure charged to the revenue account (a significant proportion of which is likely to relate to capital spend on operational assets).

There is already strong collaboration across Staffordshire & Stoke-on-Trent through the Joint Municipal Waste Management Strategy (JMWMS), with a new version due for consultation in 2026. This approach has achieved alignment across procurement, operations and service provision.

There is opportunity to generate further efficiencies by continuing to run some elements at scale across the MSA, and by harmonising operations and service levels. Contractual arrangements running as late as 2038 in Staffordshire means aligning districts with complementary operations and end dates is a material consideration.

The following sets out how our proposal creates this alignment and is likely to reduce complexity of transformation, subject to the approach taken by these sovereign authorities.

Disposal operations

Joint working arrangements for waste disposal, operation of household waste and recycling centres, and winter maintenance are proposed to run at larger scale across the MSA due to the need for significant joint infrastructure and related logistics. Any configuration of local government across Staffordshire must work on a local, regional and national scale to create a circular economy. This capability will only become more important as the Emissions Trading Scheme (ETS) and Energy from Waste (EfW) initiatives are rolled out.

Unitary A

Newcastle-under-Lyme already runs its own waste, recycling and streetscene operations, alongside arrangements for disposal. Newcastle-under-Lyme is currently the only authority across Staffordshire collecting food waste. There are specific opportunities to integrate tactical highways services currently run by Staffordshire County Council (e.g. grass cutting, street sweeping, gully emptying, highways maintenance).

Unitary B

Four out of 10 waste authorities in Staffordshire operate waste and recycling under a contract. Three of these (Stafford, South Staffordshire, Cannock Chase) make up the geography of proposed unitary B, of which two are with a common contractor. This, alongside reasonably aligned contract end dates between 2035 and 2038, offers a pathway for smoother transformation. Streetscene is delivered in-house by all three current authorities within the unitary B footprint, with an existing shared arrangement between Stafford and Cannock Chase.

Unitary C

Staffordshire Moorlands is the only authority in Staffordshire partnering on delivery with a local authority outside of Staffordshire. In-house operations at Stoke-on-Trent creates a potentially more complex transformation journey for all stakeholders.

Unitary D

Lichfield and Tamworth run joint waste and recycling operations, while East Staffordshire has in-house arrangements. All authorities separately run in-house streetscene operations, with East

Staffordshire seeking to return grounds maintenance operations in-house after the upcoming 2026 contract end date. This creates a pathway for joint operations.

Planning

Planning and development is a critical service for unlocking economic growth, housing development and infrastructure delivery. It comprises of two core services which are inextricably linked:

- **Planning policy:** formulating the policies and plans for the development and use of land and property over a medium-to-long-term period in a Local Development Plan
- **Development management:** applying the Local Development Plan and National Planning Policy Framework (NPPF) to determine planning applications

The 2023 housing delivery test measurements across Staffordshire show significant levels of delivery, with every Local Planning Authority (LPA) delivering considerably above target and above the national median, with the exception of Stoke-on-Trent (91%, action plan).

LPAs, as part of their statutory plan making duties, already hold regular meetings to address cross-boundary matters. More informally, the Staffordshire District Officer Group (SDOG) (and equivalent group for Development Management matters) meet quarterly to discuss topical matters and share good practice, alongside liaison with Staffordshire County Council in respect of matters to do with minerals and waste, education, transport and health. The latter is an opportunity for integration with the creation of new single tier authorities.

Commentary on proposed authorities below considers current progress on housing and infrastructure delivery, planning performance and complementary LDP timescales. It supports alignment of the proposed model but is not assumed to offer any significant collaboration benefits.

Unitary A

The emerging LDP at Newcastle-under-Lyme seeks to deliver a minimum of 8,000 dwellings and 63 hectares of employment land over the period 2020 to 2040, supported by necessary infrastructure. It seeks to allocate sub-regional scale employment sites at Junction 16 (site reference AB2) for logistics and freight uses (and a Lorry Park) and an extension to the existing science and logistics park at Keele University. The Plan has been developed working closely with local key stakeholders, including to collaborate around key supporting documents such as the Infrastructure Delivery Plan. Subject to main modifications it is expected that the Plan can be adopted in early 2026. The Council is committed, through its Local Development Scheme (LDS), to start preparatory work on an update to the LDP before the end of the year (in line with regulations expected to be published for the Levelling Up and Regeneration Act).

A total of 2,071 homes have been delivered over the preceding five financial years in the borough, and this is forecast to accelerate further to deliver 2,919 from FY25/26 to FY29/30. Development management targets are being increased further from current performance (Appendix 1: financial model methodology, part 4) to support this.

This progress supports Newcastle-under-Lyme's ability position as an authority with a clear and credible plan for development and economic growth.

Unitary B

Like Newcastle, Cannock Chase and South Staffordshire Council's currently have LDPs under examination, with Cannock Chase already expecting to complete consultation on main modifications in December 2025, suggesting imminent adoption. Stafford is expected to adopt its LDP in 2027 *but has put its plan on hold pending the introduction of new plan making legislation. This suggests that the proposed authority would be required to run with a number of LDPs in the medium-term but this is inevitable given the progress at Cannock Chase and South Staffordshire.*

Unitary C

Figure 13 in the sections above demonstrates proposed authorities with more evenly distributed obstacles to housing, where the geography of Unitary C shows significant areas with low barriers to housing delivery in close proximity to the primary conurbation of Stoke-on-Trent, comprised of six historic towns. However, the 2023 housing delivery test shows that these two areas are the lowest performing in terms of housing delivery⁸, despite Stoke-on-Trent being the second highest performing council for development management (see Appendix 1: financial model methodology, part 4). Current timetables suggest that Staffordshire Moorlands and Stoke-on-Trent are aiming for adoption of new LDPs in 2027 and 2028 respectively, which is a potential common lever to unlock development across the geography through consolidated strategic planning.

Unitary D

The LDP timetable at Lichfield suggests adoption in 2027, with East Staffordshire and Tamworth working to 2028 adoption of their respective plans. This creates timetable alignment in an area which is already collectively delivering upwards of 200% as per the 2023 housing delivery test.

Regulatory

We are adopting a differentiated approach for this section (as compared to "Planning" above and "Corporate" below) and are proposing a regional focus rather than a high-level assessment on a proposed unitary by unitary basis. As there is very limited sharing or alternative service delivery arrangements in place in this area, significant benefits may be achievable against the devolution and reorganisation agenda.

We believe that Regulatory service delivery is an area that carries significant potential for shared delivery across the region, given the intended responsibilities of the MSA (e.g. economic development; environmental policies and initiatives; public safety) and the relationship between these responsibilities and the areas covered by regulatory service delivery (e.g. Licensing; Private Sector Housing; Trading Standards; Environmental Protection; Food & Safety).

Our benefits modelling assumes this model and acknowledges that the regional collaboration approach will require a three-level framework to support effective outcomes:

- Level 1 – strategic alignment to drive regional outcomes
- Level 2 – local differentiation based on evidence and need
- Level 3 – shared service delivery

Level 1 – strategic alignment to drive regional outcomes

Working across the MSA, there should be a clear understanding of the cause-and-effect relationships between regional outcomes and the regulatory frameworks and levers that are available to support them.

This should lead to a shared approach to the development of strategic frameworks within which each proposed unitary can exercise discretion.

Level 2 – Local differentiation based on evidence and need

Within this wider, regional strategic approach there will be a need to use data, evidence and insight to understand where local areas require specific approaches in terms of policy, and/or enforcement. We understand that the geographic, demographic and socio-economic diversity across Staffordshire will present some challenges in this process but believe that the effective implementation of the devolved and reorganised structure of local government will support the reconciliation of levels 1 and 2.

Level 3 – Shared service delivery

The successful development and implementation of the preceding levels will create the context for the design and development of large-scale shared service delivery across the regulatory service areas and the wider region. With many of the professions in these areas facing recruitment and retention pressures, this will help with the stability of the proposed unitaries while the scale involved will create clearer and more compelling career opportunities.

Corporate

Unitary A

As a stand-alone unitary authority, there are few immediate opportunities for Newcastle-under-Lyme from aggregation and rationalisation through the reorganisation process. However, we believe that significant potential still exists as a result of:

- 1) The identification of areas (e.g. operational service delivery; asset utilisation) of overlap with Staffordshire County Council within the geographic area of Newcastle-under-Lyme. Any such areas can be addressed during the transition phase of reorganisation with a timeline for realisation developed
- 2) Short-Medium term identification of opportunities to share delivery of key service areas/costs to smooth the transition process by reducing risk and cost (e.g. continuing/extending novated arrangements in areas such as ICT infrastructure; ICT application provision; outsourced processing arrangements such as payroll)
- 3) Medium-Long term identification of areas where it is advantageous to operate across the new structures at scale, either with the strategic authority or as the unitary authorities operating in concert. We discuss this as a principle below (People services section) and strongly believe that it will be important for the new councils to understand where “local” differentiation of strategy, policy and service delivery is critical versus where there are worthwhile benefits from operating at scale across the new geographies (or wider). Based on experience from other regions, these areas could include:
 - a) ICT Infrastructure

- b) HR/Payroll
- c) Finance (technical accounting provision)
- d) Revenues & Benefits

It is important to be clear that the thinking set out in 1 – 3 above are not unique to Unitary A, but are at least equally operant for Unitaries B, C and D. While we will not repeat them in the sub-sections below, they should be considered as relevant. In addition, these approaches and considerations underpin our assessment of costs and benefits contained within our financial modelling.

Unitary B

Building on the shared service/delivery architecture already in place between Stafford and Cannock Chase, this council will be well placed to transition. Notwithstanding this, there are additional potential benefits (to the items set out under Unitary A) such as:

- Aggregation and rationalisation of senior officers with South Staffordshire
- Aggregation and rationalisation of managers and front-line service staff with South Staffordshire
- Aggregation and rationalisation of corporate service operations and staff with Staffordshire County Council
- Additional (to the Staffordshire County Council context set out in 1. above) asset rationalisation across the geographies of Stafford, South Staffordshire and Cannock Chase

Unitary C

With our stated assumption that the current shared working between Staffordshire Moorlands and High Peak councils will need to be unwound, Unitary C presents perhaps the most challenging context from a reorganisation, and particularly a transition, perspective.

However, with the inclusion of Stoke-on-Trent as an existing unitary council it is likely that this will result in a Continuing Authority model for the transition phase of reorganisation. This model presents opportunities to both speed and smooth transition, while also providing a means of overcoming the potential risks presented by the disaggregation of the service arrangements in place between Staffordshire Moorlands and High Peak councils.

As the aggregation of a unitary and a district council, along with the disaggregation of the Staffordshire County Council elements for Staffordshire Moorlands, there are opportunities for the future council to:

- Integrate the county services (both at the corporate centre and elsewhere) into the existing unitary structures with minimal additional costs
- Integrate the district services (both at the corporate centre and elsewhere) currently impacted by the shared arrangements with High Peak into the existing unitary structures and infrastructure with minimal additional costs

Unitary D

As with Unitary B, this new authority is constructed on the geographies and communities of the existing councils East Staffordshire, Lichfield and Tamworth along with the services currently

delivered to those areas by Staffordshire County Council. However, unlike proposed unitaries B and C there are no significant shared service/delivery arrangements in this context.

We expect to see comparable level of change to Unitary B but with a *potentially* higher level of cost and benefit due to the increased level of aggregation and rationalisation in senior roles and some senior service delivery roles (although the financial case takes a prudent view).

6.4. People services

The impact of local government reorganisation on the delivery of people services – and vice versa – cannot be understated. It will be critical to ensure that the optimum balance between continuity, the management of risk and configuring services as close to the community as possible is found and effectively implemented.

There has been a great deal of opinion expressed on this issue in recent months, with some arguing for scale and single point of accountability as being the critical success factor while others believe that there are clear arguments in favour of smaller, more agile and service-user centric models for these services. However, it may be possible in some local government contexts to strike a balance between these perspectives, with some elements of the services operating at scale while others are located close to the service user and at a smaller scale.

The Staffordshire context

Across Staffordshire, the statistical life expectancy for both men and women is broadly in line with the national average. However, there is some difference when considering this across the current district/borough council areas within the county.

Our analysis for this submission uses publicly available data. As a result, there are differences in the level of detail that is available, with some data being at a district/borough level while others being limited to county level.

The following sub-sections pull out some of the most relevant Staffordshire service demand and demographic data in the context of LGR, with full analysis available in Appendix 5: education, children's social care and adult social care analysis.

Life expectancy

- The life expectancy of Staffordshire for men (79.5) and women (83.2) is greater than the regional (78.4/82.5) averages but in line with the England average (79.1/83.1)
- Healthy life expectancy is higher in Staffordshire than the national and regional averages with 63.3 years for men, and 63 years for women. This represents an expected unhealthy number of years of 16.2 for men, and 20.2 for women which is lower than the difference between healthy and overall life expectancy across England and the West Midlands
- Life expectancy in Stoke-on-Trent however is notably several years below its neighbour, as well as the regional and national averages as life expectancy for men is 76.3 and for women life expectancy is 80.1
- Healthy life expectancy is also lower in Stoke-on-Trent at 56.2 for men and 55 for women; this suggests there are an average of 20 years not-healthy for males and 25 for women. This

duration is multiple years greater than the regional (18.1/22.5) and national averages (17.6/21.2)

Indicator	England	West Midlands	Staffordshire	Stoke-on-Trent	Newcastle-under-Lyme	Cannock Chase	East Staffordshire	Lichfield	South Staffordshire	Stafford	Staffordshire Moorlands	Tamworth
Overall male life expectancy	79.1	78.4	79.5	76.3	78.5	78.4	78.9	80.9	80.2	80.4	79.7	78.9
Overall female life expectancy	83.1	82.5	83.2	80.1	82.5	82.1	82.6	84	84	83.8	83.6	82.7
Healthy male life expectancy	61.5	60.3	63.3	56.2								
Healthy female life expectancy	61.9	60	63	55								

Figure 14: life expectancy⁹

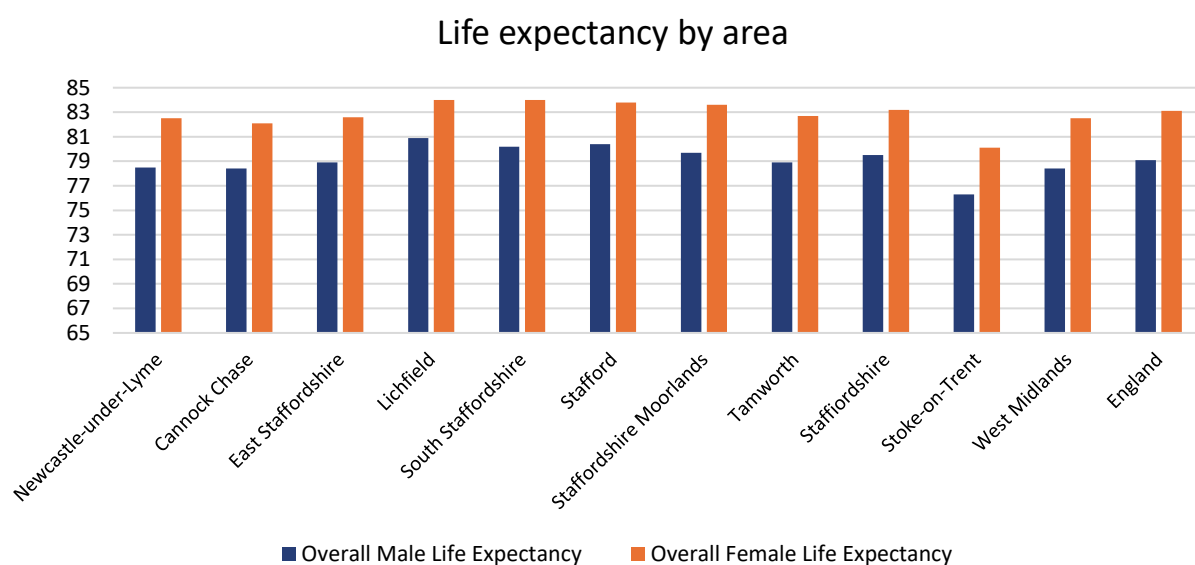


Figure 15: life expectancy by area

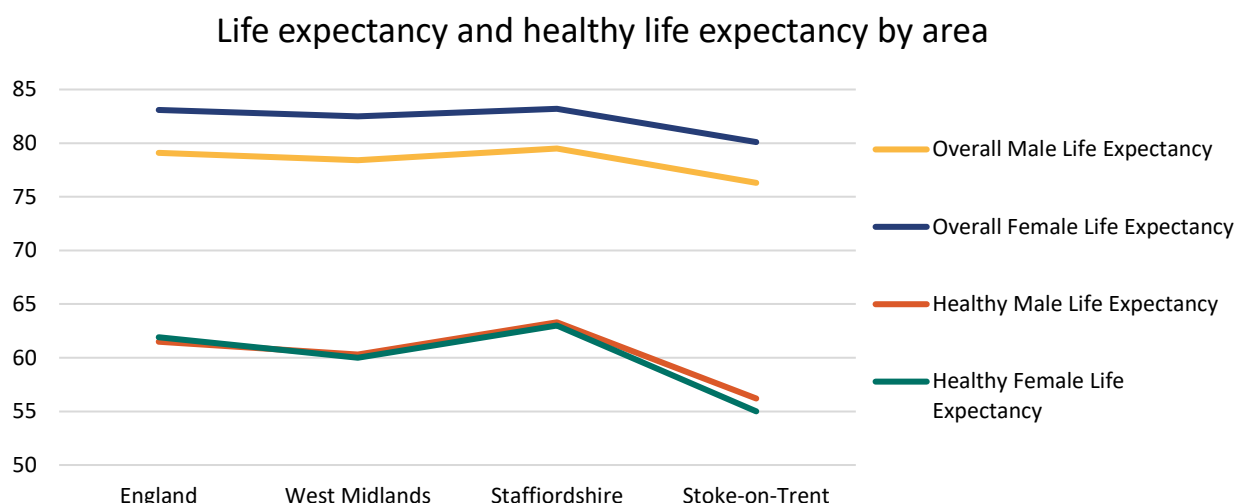


Figure 16: life expectancy vs. healthy life expectancy by area

Rates of children living in families with absolute and relative low incomes

When it comes to the quality of life for children, there is a clearer difference across the county, particularly when including the data for Stoke-on-Trent, with significant variation in levels of children living in households with absolute and/or relative low incomes.

- The rates of children under 16 living in families with “absolute” and “relative” low-income measures varies noticeably across Staffordshire, with East Staffordshire having the highest rates for both by almost 3%. Lichfield has the lowest proportion of children living in families of either measure of lower incomes, by a notable margin
- Newcastle-under-Lyme reached 19.9% for absolute low income, which while above both the England average (19.1%) and Staffordshire’s average (18.1%), was below the West Midlands average (25.5%) and far lower than the neighbouring unitary authority of Stoke-on-Trent (35.3%)

Indicator	England	West Midlands	Newcastle-under-Lyme	Cannock Chase	East Staffordshire	Lichfield	South Staffordshire	Stafford	Staffordshire Moorlands	Tamworth	Staffordshire	Stoke-on-Trent
Number of children under 16 living in families with Absolute Low Income	2,030,841	300,592	4082	3761	5879	2371	2800	3706	2412	2811	27,824	18,997
Percentage of children under 16 living in families with Absolute Low Income	19.1%	25.5%	19.9%	20.5%	23.9%	12.8%	15.8%	15.7%	16.1%	18.4%	18.1%	35.3%
Number of children under 16 living in families with Relative Low Income	2,354,691	343,549	4781	4468	6650	2772	3247	4264	2807	3400	32,380	21,338
Percentage of children under 16 living in families with Relative Low Income	22.0%	29.2%	23.3%	24.4%	27%	15%	18.3%	18.1%	18.8%	22.3%	21.1%	39.7%

Figure 17: low-income for children living in families

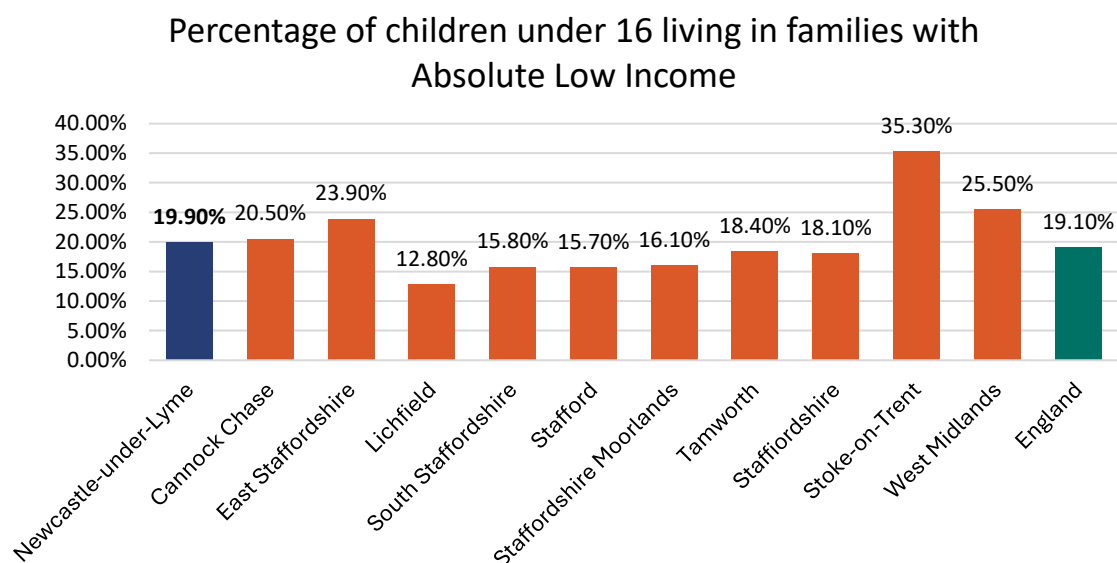


Figure 18: absolute low income

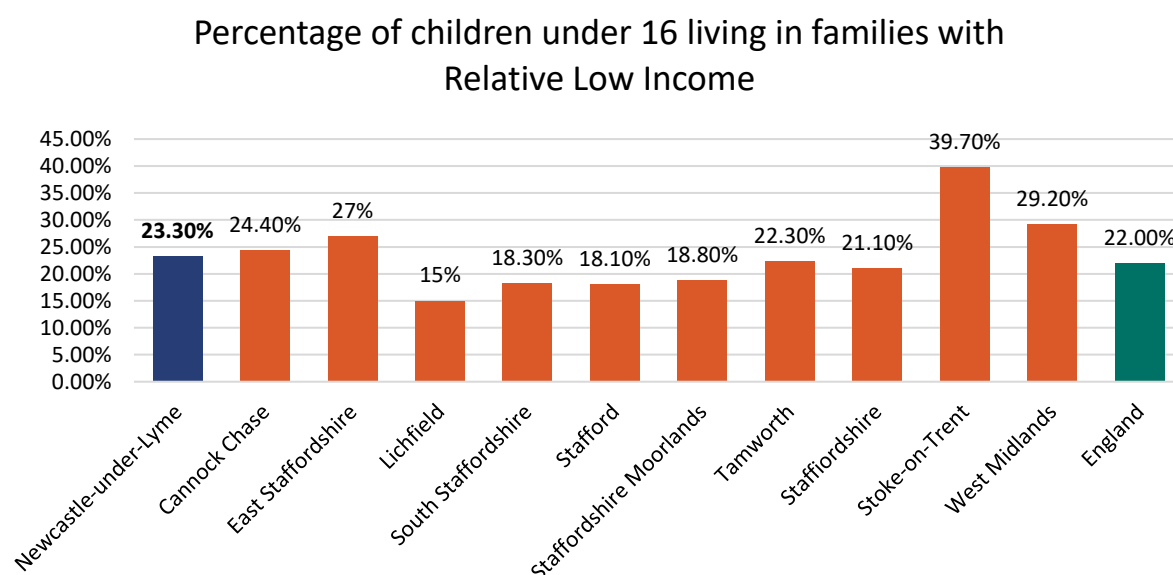


Figure 19: relative low income

Requests for support

In terms of financial sustainability/resilience, much of the current pressure across the country is being driven by the increasing demand in social care. When compared to others on a national basis, the level of demand in Staffordshire is generally lower. However, there is a relatively clear upward trend in key indicators for Adults (e.g. requests for support from older people) while the picture for Children's Services/Education is more nuanced, with some indications of increasing underlying need (e.g. Free School Meals; EHCPs; SEN) but with less direct support being offered (e.g. placements).

Number of requests for support received from new clients aged 18-64 (three year trend)

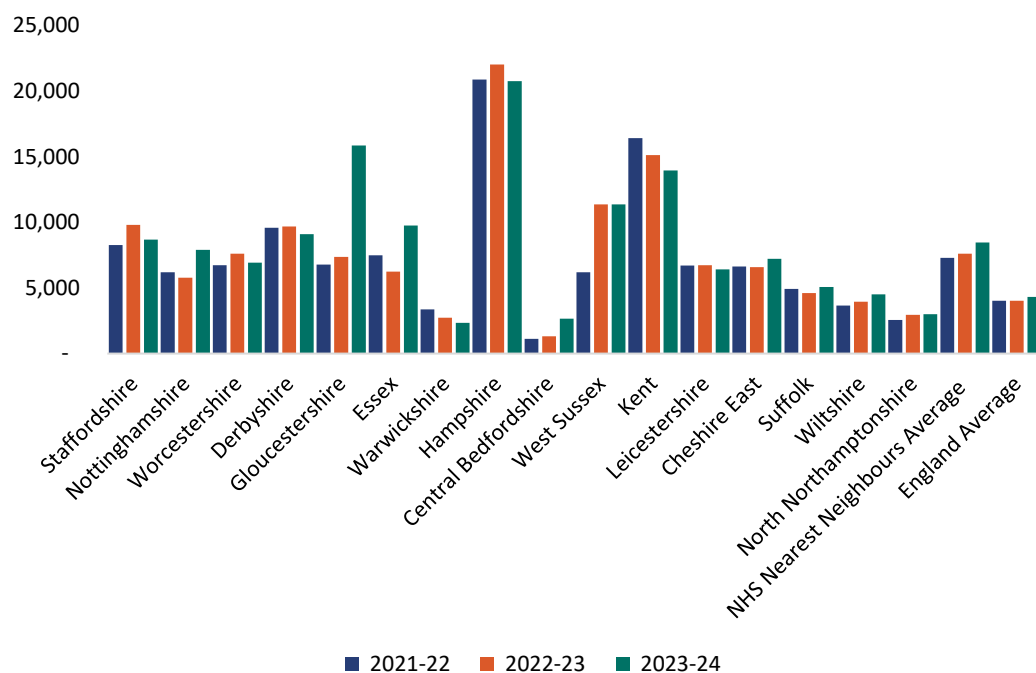


Figure 20: requests for support (new clients aged 18-64)

Number of requests for support received from new clients aged 65 and over (three year trend)

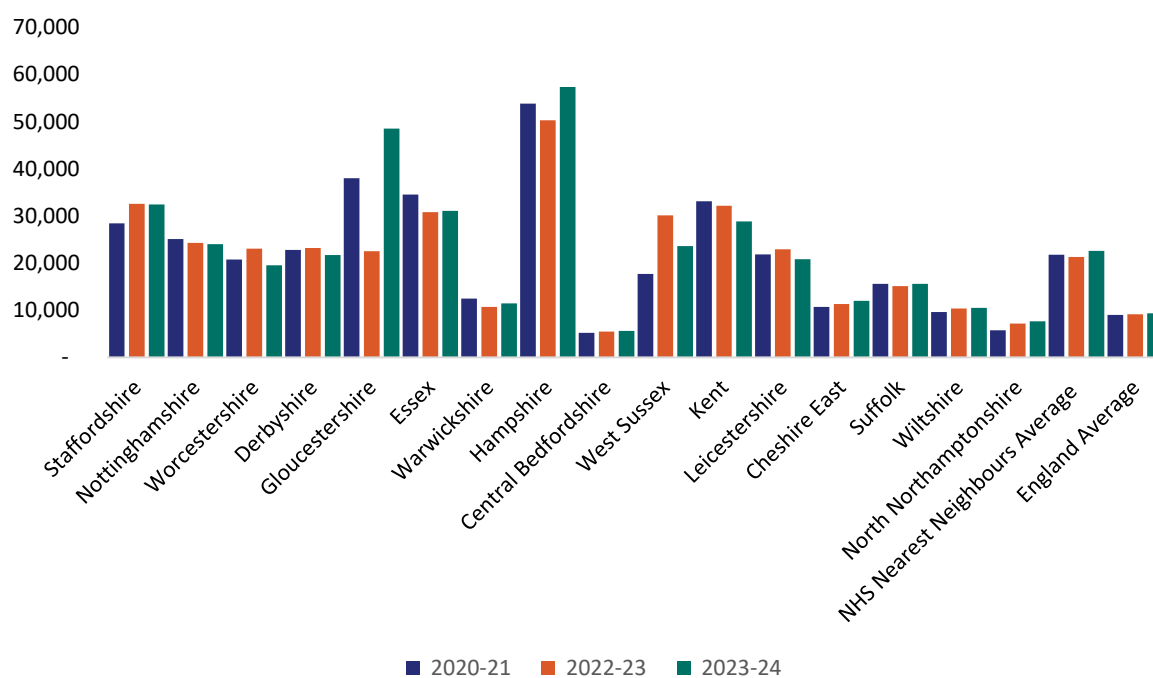
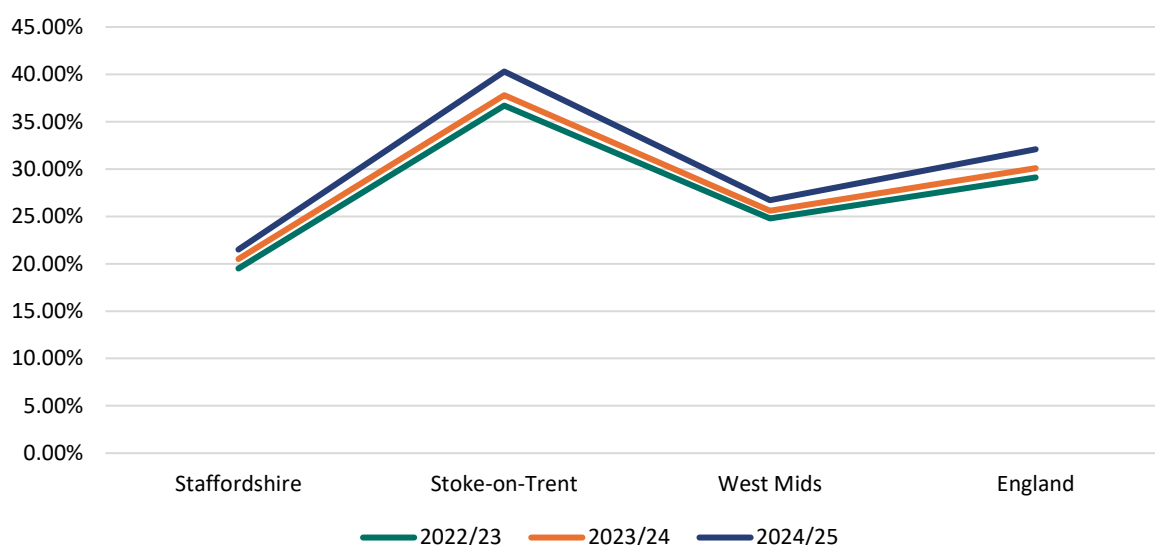


Figure 21: requests for support (new clients aged 65+)

Percentage of Pupils eligible for FSM by area



Number known to be eligible for school meals			
Area	FY22/23	FY23/24	FY24/25
Staffordshire	117,530	118,252	117,859
Stoke-on-Trent	40,304	40,971	40,650

Figure 22: schools, pupils and their characteristics¹⁰

Staffordshire:

- In 2022/23 19.5% of pupils in Staffordshire were eligible for Free School Meals; this was lower than the national average of 29.1% and the West Midlands average of 24.8%
- By 2023/24 21.5% of pupils in Staffordshire are eligible for free school meals, an increase of 2% across the two years, an increase higher than the total increase regionally (1.9%) but lower than the national increase of 3%
- Staffordshire County Council has experienced a lower FSM rate than Stoke-on-Trent across the three-year reporting period. Staffordshire also has a lower rate of FSM eligibility than both the regional and national averages

Stoke-on-Trent:

- In 2022/23 36.7% of pupils in Stoke were eligible for Free School Meals, this has since risen to 40.3% in 2024/25, an increase of 3.6% in this period, above the national average increase in the proportion of pupils eligible for FSM of 3%
- Across the three reporting years the FSM eligibility rate for pupils in Stoke-on-Trent was notably higher than both the regional and national averages

Looked after children

- LAC is slightly above statistical neighbours, but has been pretty stable over the last 3 years

- The number of children starting to be looked after fell and the number ceasing to be looked after saw an increase in 2024. This net reduction should reduce some of the budgetary pressure in this area

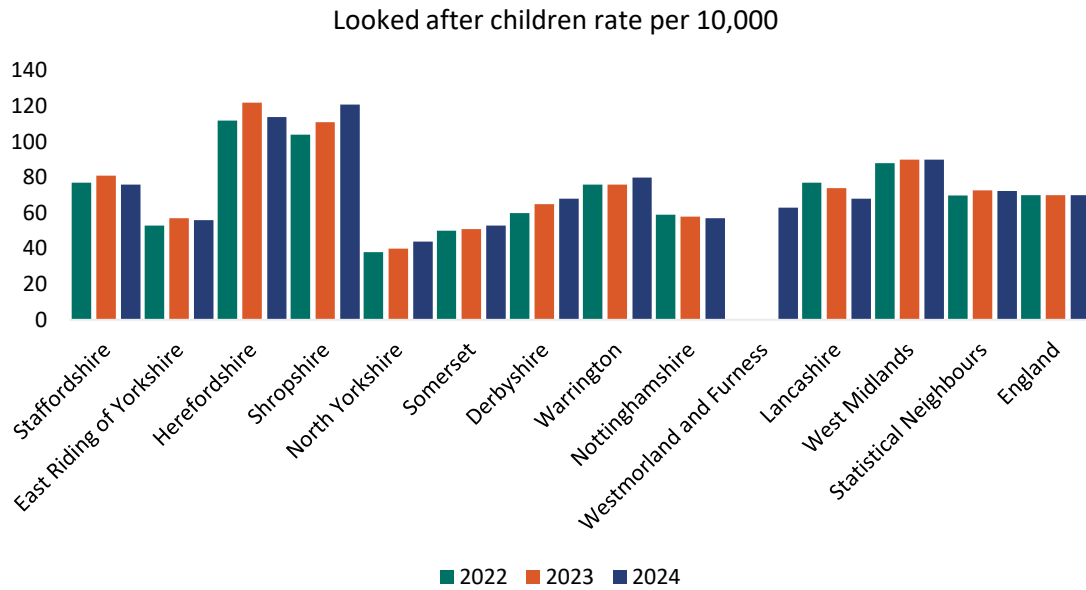


Figure 23: looked after children rate

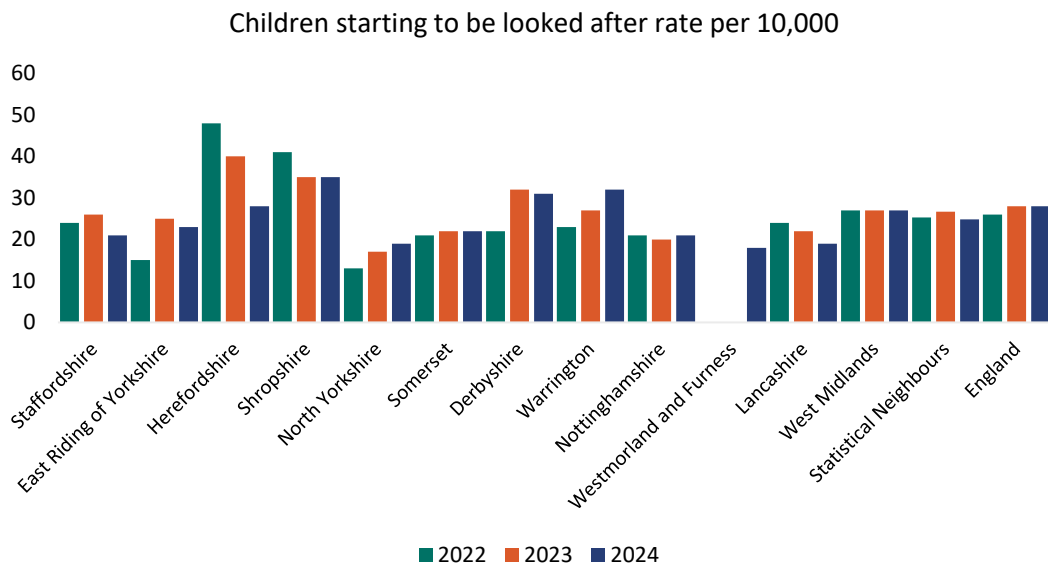


Figure 24: children started to be looked after rate

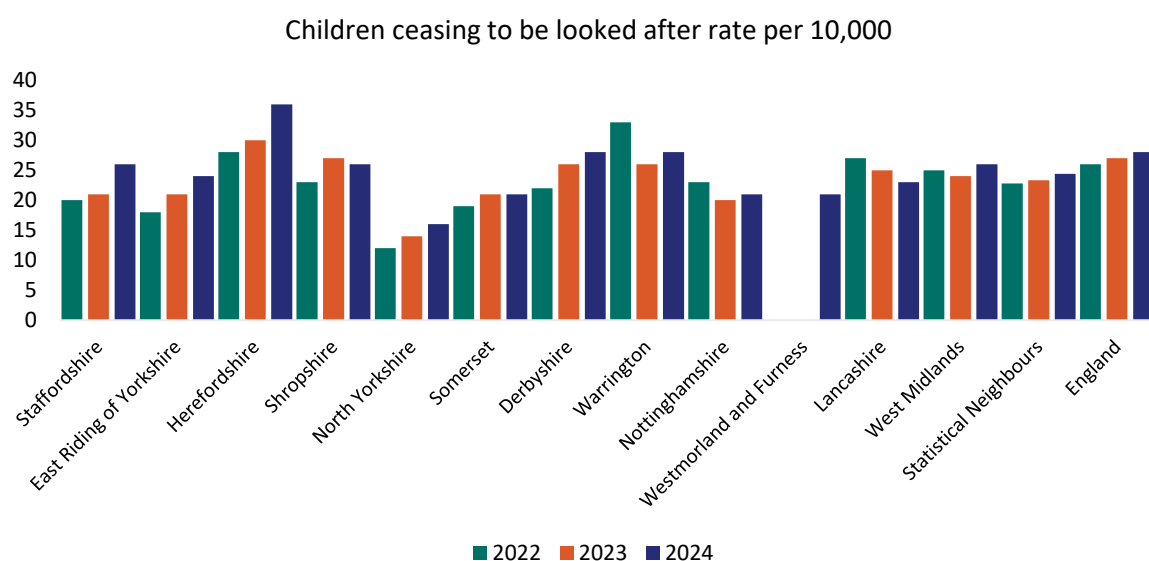


Figure 25: children ceasing to be looked after rate

SEND EHCP and SEN support

Percentage of pupils with an EHCP and % pupils in receipt of SEN Support, while increasing, are in line with the national picture and statistical neighbours.

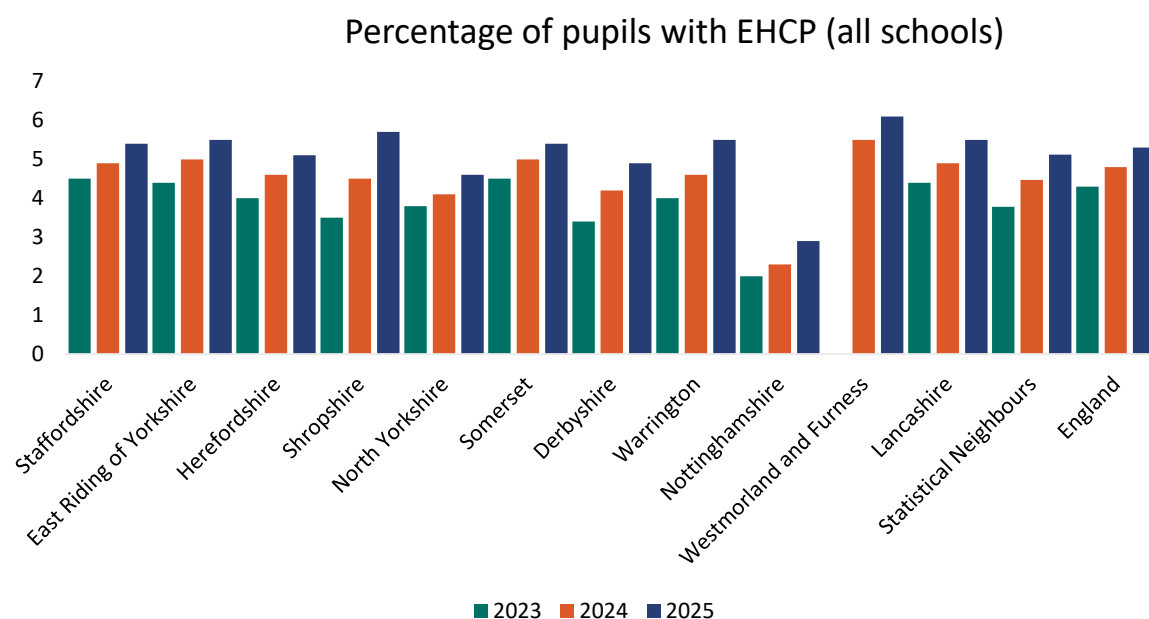


Figure 26: percentage of pupils with EHCP

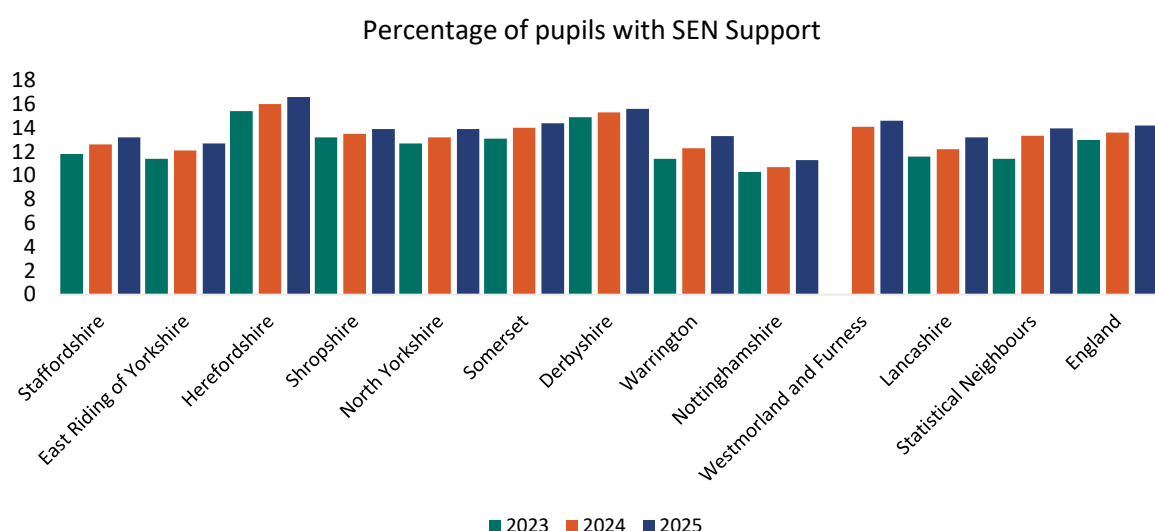


Figure 27: percentage of pupils with SEN support

Pupils with EHCPs by district/borough

- There were 877 children and young people with an EHCP within Newcastle-under-Lyme in 2021/22. This rose to 1,060 by 2023/24, a rise of 17% between these years. This makes Newcastle-under-Lyme the 5th highest district of the eight by total number of EHCPs
- The forecasted growth of EHCPs estimates that by 2030, 1,564 pupils in the district will have an EHCP, forecasting a 32.2% growth in the overall number of children supported by these plans between 2023/24 and 2030. This is the highest forecast growth

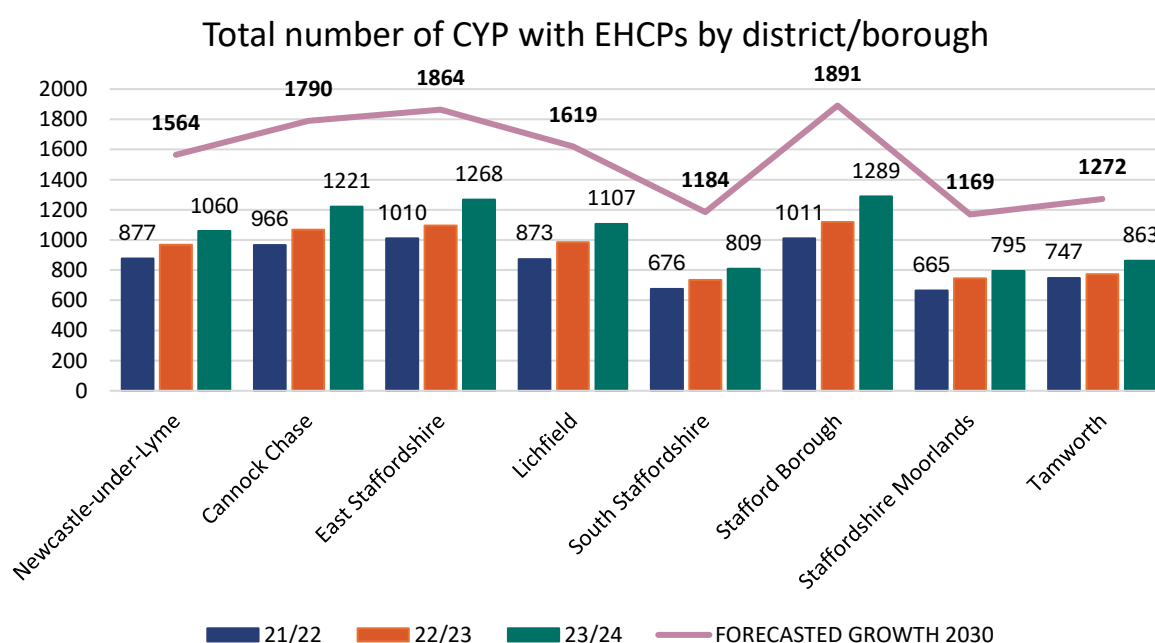


Figure 28: total number of CYP with EHCPs

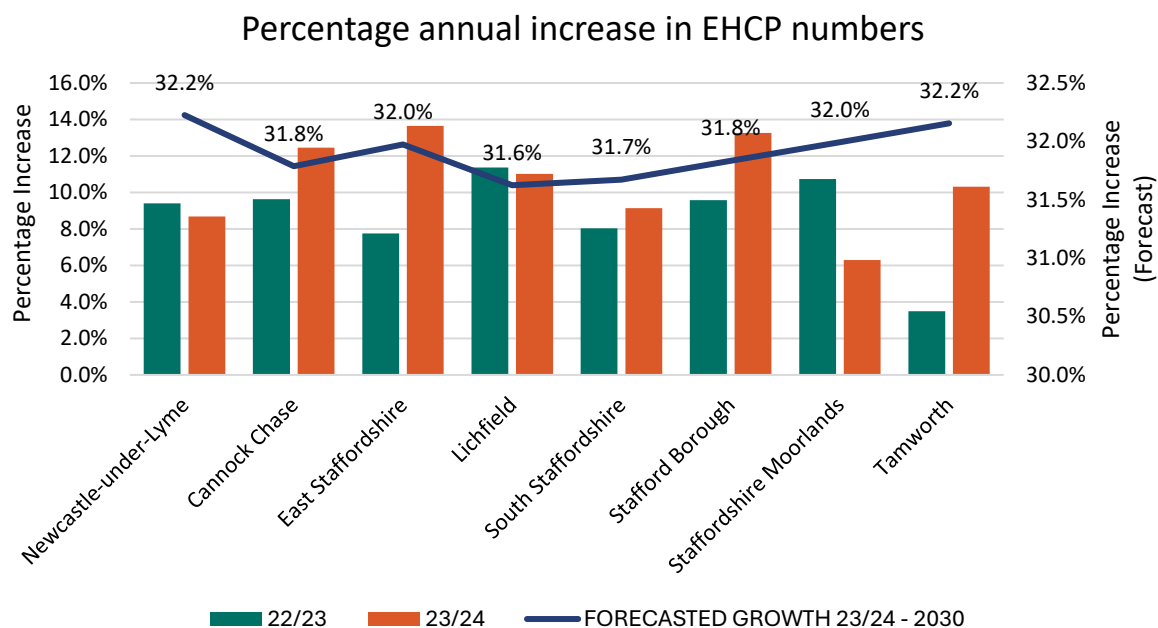


Figure 29: EHCP increases

Proportion of registered pupils with SEND by Districts

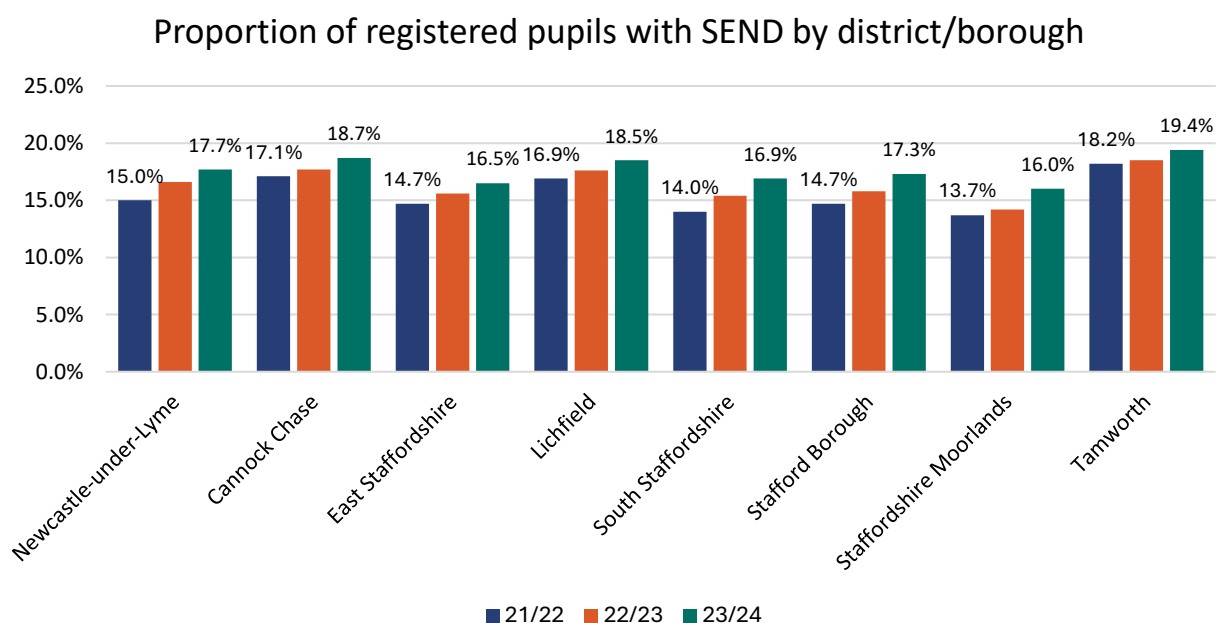


Figure 30: proportion of registered pupils with SEND

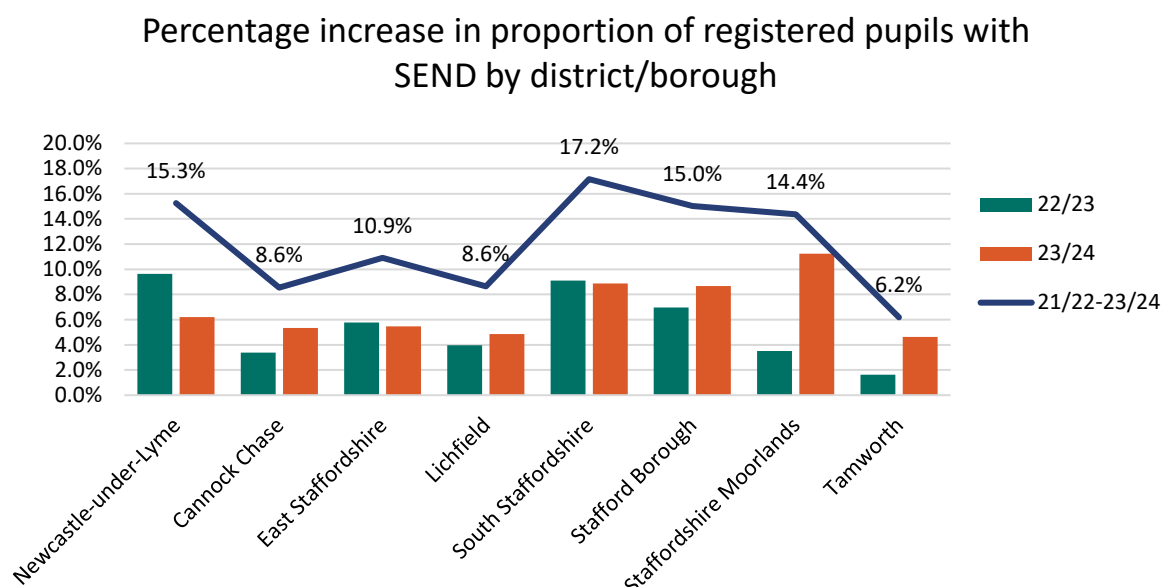


Figure 31: percentage increase in registered pupils with SEND

- In 2021/22 **15% of pupils in Newcastle-under-Lyme had SEND**, which was lower than the mean percentage across Staffordshire of 15.5%. The proportion of students with SEND in Newcastle-under-Lyme then rose to **17.7% by 2023/24, a proportion greater than the Staffordshire mean (17.6%)**
- This shows that an **increase of 15.3% had taken place between 2021/22 and 2023/24**, the **second highest rate of increase** second only to South Staffordshire (17.2%)
- This means that Newcastle-under-Lyme, while having the **fourth highest number of pupils with SEND**, has significantly growing needs around SEND within its school-age population within the district, with this increase more pronounced than most other areas of Staffordshire

This high-level statistical context is relevant in any consideration of the future structure of people services in a reorganised context for Staffordshire. Currently, the picture for Adult and Children's Social Care services in Staffordshire is mixed, with Adults having received a "Good" rating (CQC May 2025) and Children's being considered "Requires improvement to be good" in their latest inspection (Ofsted November 2023).

Opportunities for transformation through reorganisation

With our preferred option for reorganisation being a stand-alone unitary authority for Newcastle-under-Lyme, there is a need for us to set out how we propose to manage the future delivery of these services across the disaggregated Staffordshire County Council footprint.

While we are constrained to some extent by the level of district/borough specific data, we believe that the data that is available shows that Newcastle-under-Lyme has a unique demand profile within Staffordshire, particularly when viewed through the lens of potential aggregation with geographically contiguous options for reorganisation (e.g. Stoke-on-Trent; Staffordshire Moorlands). Aggregation with these areas, with their own particular areas of demand in these service areas, could result in the specific needs of the residents and communities in Newcastle-under-Lyme being at best diluted

and at worst overlooked, as a result of the more pressing considerations inherited in the case of Stoke-on-Trent.

The needs of this unique statistical profile, and the communities and people that it describes, are best served through a local authority that is close and engaged with strong existing links and relationships. The links and relationships will help us develop a strategy and policy framework for people services that provides the right level of support. This will enable outcomes our residents and communities require, while also supporting a more responsive service model that could help reduce costs in the medium to long term.

However, we acknowledge that while our proposed scale, proximity and agility present significant benefits there are some elements of the current people services that may be better delivered at a wider, cross-unitary scale. This combination of local focus and responsiveness combined with strong public sector integration and economies of scale is more likely to support the wider public sector transformation ambitions set out by Government and which will be a key focus of a the new MSA, i.e.

- **Integrate services around people:** design services and systems around the needs of citizens' lives, rather than around departments
- **Prioritise prevention:** shift from a focus-on-crisis response to a more proactive, preventative approach
- **Improve and innovate continuously:** focus on a cycle of continuous improvement and innovation in services, rather than relying on time-bound programmes
- **Deliver around missions:** structure transformation around clear, long-term missions that deliver meaningful outcomes for citizens

Based on this analysis, our view is that the right model to strike the optimum balance referred to above is a hybrid, where there is a blend of local accountability and economies of scale through a large-scale shared service/partnership model. This hybrid model could be characterised by the following:

1. **Empowered and accountable local authorities:** Newcastle-under-Lyme, along with its corresponding new unitaries, should have the ability to interpret and respond to the needs of their local communities as their elected Members and senior officers believe is appropriate. This will require each unitary to make its own decisions about officer structures and how they deliver the statutory accountabilities traditionally held by roles such as the Directors of Adult/Children's Social Care structures
2. **Front-line service delivery close to the need:** smaller scale unitary authorities will ensure that local service delivery remains just that – local. With the opportunity and prerogative to ensure that physical access to critical support services, which is particularly relevant for the specific services being considered here, we can ensure that all those who need our support get it in the right way and at the time for them
3. **Market management and development at the right scale to have impact:** commissioning of care placement frameworks and/or the management of care provision services benefit from economies of scale to ensure best value. Furthermore, with the care market potentially becoming an important factor in economic development, as well as skills and education

planning/delivery, having scale for this activity provides an opportunity for the MSA to influence and coordinate these agendas at a regional level

4. **Integration with Health/Public Health:** we recognise that the wider health infrastructure cannot be planned and delivered at a comparatively small local scale (e.g. acute trusts delivering hospital services) and there will be a need to establish appropriate leadership and governance of the sector in the wake of both devolution and local government reorganisation. In any eventuality, this process must take into account the new unitary structure of local government for the region and ensure local stakeholders have effective representation especially considering that much of the medium to long term emphasis, from both a public sector reform and a financial sustainability perspective, is focused on the successful design and implementation of prevention initiatives. There will be critical interdependencies to initiatives and/or interventions at scale that will be considered and administered under the responsibilities of the new MSA, e.g.
 - a. Housing
 - b. Economic development
 - c. Skills & employment
 - d. Transport & infrastructure
 - e. Public services, extending to health and wellbeing

7. Financial case

Key criteria:

- *Secures financial efficiency, resilience and the ability to withstand financial shocks*

This section explains financial modelling for the proposal to:

- Focus beyond the current financial year to demonstrate that each proposed authority is financially sustainable in the medium-term, reflecting that forecast demand pressures and core funding settlements are likely to vary across the region
- Model resilient councils that run services at most appropriate scale to take efficiencies, and which can support as much of the transition and subsequent transformation journeys to emerge with a robust balance sheet relative to their scale and operations
- Identify value for money discrepancies future councils will have to confront and reconcile when harmonising service standards
- Assess the affordability of implementation including the phasing of benefits, disbenefits, one-off costs and funding of those costs

7.1. Current challenges

While LGR presents significant opportunities for transformational benefits, any configuration of local government in the region will continue to face significant systemic pressures. These include rising adult social care demand, children's care placements, SEND and temporary accommodation. Critical pressures across the potential MSA include:

- DSG deficits across the MSA, most notably within Staffordshire County Council which is forecast to increase to £350M by 2030
- A general revenue reserve of less than £5M at Shropshire, representing less than 1% of service expenditure, with projected overspend of £50M in FY25/26 resulting in a request for Exceptional Financial Support (EFS)
- Over £700M of net borrowing (inc. HRA) at Stoke-on-Trent, with £16.8M exceptional financial support and a projected overspend of £13.7M in FY25/26
- Appropriations from reserves of £8.4M to set a balanced budget for FY25/26 at Telford & Wrekin
- Projected medium-term challenges across all existing councils

7.2. Purpose of our financial models

Our financial modelling takes a consistent approach to forecasting where proposed councils are likely to experience structural (recurring) pressure in the base revenue budget, and the scale of that pressure relative to controllable expenditure. This forecasting approach serves as a *baseline* against which to apply transformation benefits/disbenefits and phased one-off costs. This demonstrates the

financial viability of different options in the short-term (through transition) and medium-to-long-term (through transformation and beyond).

7.3. Methodology

Our approach has been applied to all the options considered and used as a basis to guide decision-making. The model includes all eight districts, one unitary and one county authority across the Staffordshire and Stoke-on-Trent area. In addition, it also includes Shropshire and Telford & Wrekin as *potential* MSA constituents.

Our experience has been that undertaking financial modelling of the region in full, using standard and publicly available datasets, is preferable. The use of specific elements arising from different/local modelling approaches or datasets can be misleading due to the complex nature of local government datasets and varying approaches to management and financial accounting, which can negatively impact the direct comparability of options.

Three stages of financial modelling have been adopted to transparently separate underlying financial position, before applying costs and benefits of transformation resulting from LGR implementation. The advantage of this approach is to consider not just the total net savings to the region, but the ongoing viability of its constituent unitary authorities and a more nuanced approach to forecasting future spending requirements and funding settlements.

These three stages have been subsequently combined into an MTFP model, covering a forecast period of 10 years. These figures should be considered as *indicators*, and not precise forecasts. Analysis of reserves demonstrates that a combination of funding sources – including existing reserves, flexible capital, borrowing and government support – are likely to be required in any scenario.

Table 3: summary of financial modelling approach

Stage	Explanation	What it tells us
Stage 1: financial sustainability baseline	Disaggregating £1.94 billion FY25/26 revenue expenditure and related spending power (funding, including council tax and business rates retention plus major grants both inside and outside AEF) across the Staffordshire two-tier area and Stoke-on-Trent City Council, before reaggregating against proposed unitary geographies. This increases to £2.88 billion revenue expenditure including Shropshire and Telford & Wrekin. This is based on publicly available RA data, which is highly comparable. However, this budget was set at the start of the financial year and due to varying management accounting conventions, it does attempt to include existing or medium-term cost pressures. Council tax harmonisation, tax base growth, population increases and inflation are also factored into future forecasts by financial year, for both service expenditure and relevant spending power elements. Debt and reserves positions have also been analysed and disaggregated using consistent techniques.	A medium-term assessment of structural revenue pressure in the individual proposed authorities, before transformation benefits and implementation costs are considered. This stage is considered critical; demonstrating the likely distribution of financial pressure across the region. Note that Exceptional Financial Support (EFS) of £16.8M at Stoke-on-Trent is included within RA returns and assumed as an ongoing <i>structural</i> financial pressure. However, ongoing financial support conversations at Shropshire were not included in RA returns and the structural position at Shropshire is considered a <i>risk</i>.
Stage 2: transformation and reorganisation benefits	Forecast how the core financial benefits of LGR could be unlocked, and an indication of their scale/profile. This includes removing duplication, localised interventions, regional joint working and recurring disaggregation disbenefits.	Recurring benefits and disbenefits, for each proposed unitary for each financial year in the medium-term. This benefit profile can be assessed in conjunction with the financial sustainability baseline in stage 1 above.
Stage 3: implementation costs	Estimate the one-off costs of reorganisation and their likely profile.	This cost profile can be assessed in addition to stage 1 (financial sustainability baseline) and stage 2 (transformation and reorganisation benefits) above, to give a sense of feasibility and. Through further analysis of earmarked and general usable reserves, potential funding needs are also indicated.

Full details of our financial modelling approach are in Appendix 1: financial model methodology.

7.4. Financial modelling outcomes

The following section summarises outcomes from financial modelling for our proposed options, with comparative analysis for all five options detailed in Appendix 2: detailed financial modelling outcomes.

7.4.1. Financial sustainability baseline

Fair Funding Review 2.0

The LGC recently reported¹¹ that “*work done by separate sets of experts at Institute for Fiscal Studies, Pixel and London Councils all suggests there will be a major redistribution of council spending from inner London and the South to the Midlands, Yorkshire & Humberside and parts of the North*”.

The implication of this in the Staffordshire context is that Fair Funding has the potential to improve sustainability of the MSA region as a whole but Staffordshire has varying levels of deprivation and demand across urban, semi-urban and rural areas, so it is possible that areas within our MSA see both increases and decreases in funding settlements. This presents a challenge in prudently forecasting sustainability of all authorities individually, now and in future during this once-in-a-generation change.

To address this, we have explicitly referenced structural deficit forecasts at the beginning and end of the forecast period to highlight:

- Worst case structural deficit/surplus in the financial baseline at the beginning of the forecast period (this occurs in FY25/26 or FY26/27 across all authorities in all options). This uses known FY25/26 financial data, to model reorganisation as if it were to happen today. Clearly, the drawback is that vesting day will not be until 2028 and subject to funding settlements under new arrangements as well as council tax increases decided by current authorities
- Structural deficit/surplus in the financial baseline at the end of the forecast period in FY29/30. This incorporates core spending changes *indicative* of Fair Funding outcomes and generally reflects an improving trajectory for all proposed authorities

Financial sustainability outcomes

The following table summarises the difference between annual revenue expenditure requirement and spending power at each of the proposed authorities at the beginning and end of the forecast period, as explained above:

Table 4: financial sustainability baseline of proposed authorities, before transformation benefits and implementation costs

Proposed unitary	Worst case structural position at the beginning of the forecast period (occurring in either FY25/26 or FY26/27)		Structural position at the end of the forecast period (FY29/30)	
	(Deficit)/Surplus £M	Per capita	(Deficit)/Surplus £M	Per capita
A	(£6.3)	(£49)	£1.2	£10
B	£14.7	£41	£21.9	£59
C	(£15.8)	(£43)	£17.4	£48
D	(£4.2)	(£13)	£5.7	£17

Similar patterns emerge across all of the options modelled, and comparative tables are included in Appendix 2: detailed financial modelling outcomes. This baseline is largely a representation of how existing financial pressures are likely to be distributed across new proposed authorities. However, council tax harmonisation is reflected within these projections, which is a significant opportunity cost in other options.

It is recognised that council tax rates will be a local choice in each of the proposed authorities. However, the chart below (Figure 32) summarises the *capacity* of proposed authorities to levy council tax by assuming maximum statutory increases are applied over a twenty-year period from FY25/26, and comparing to the statutory limits in the current two-tier local government structure. This suggests that our proposed option is most likely to minimise:

- The aggregated financial challenge across all authorities (before transformation)
- The extent to which residents in newly formed authorities are paying different council tax rates (for the same services) in the same authority
- Inequity of any mechanisms in the Statutory Change Order to override current statutory limits and impose greater increases on some residents
- Financial risk of future options, where forecasts of future spending requirements and transformation benefits are inherently difficult to predict and assure, while there can be greater certainty around council tax foregone

The chart demonstrates the compounding effect of council tax harmonisation costs over a twenty-year period, discounting future receipts at 2% per annum to estimate figures in real terms (see Appendix 1: financial model methodology for detailed explanation of council tax harmonisation modelling).

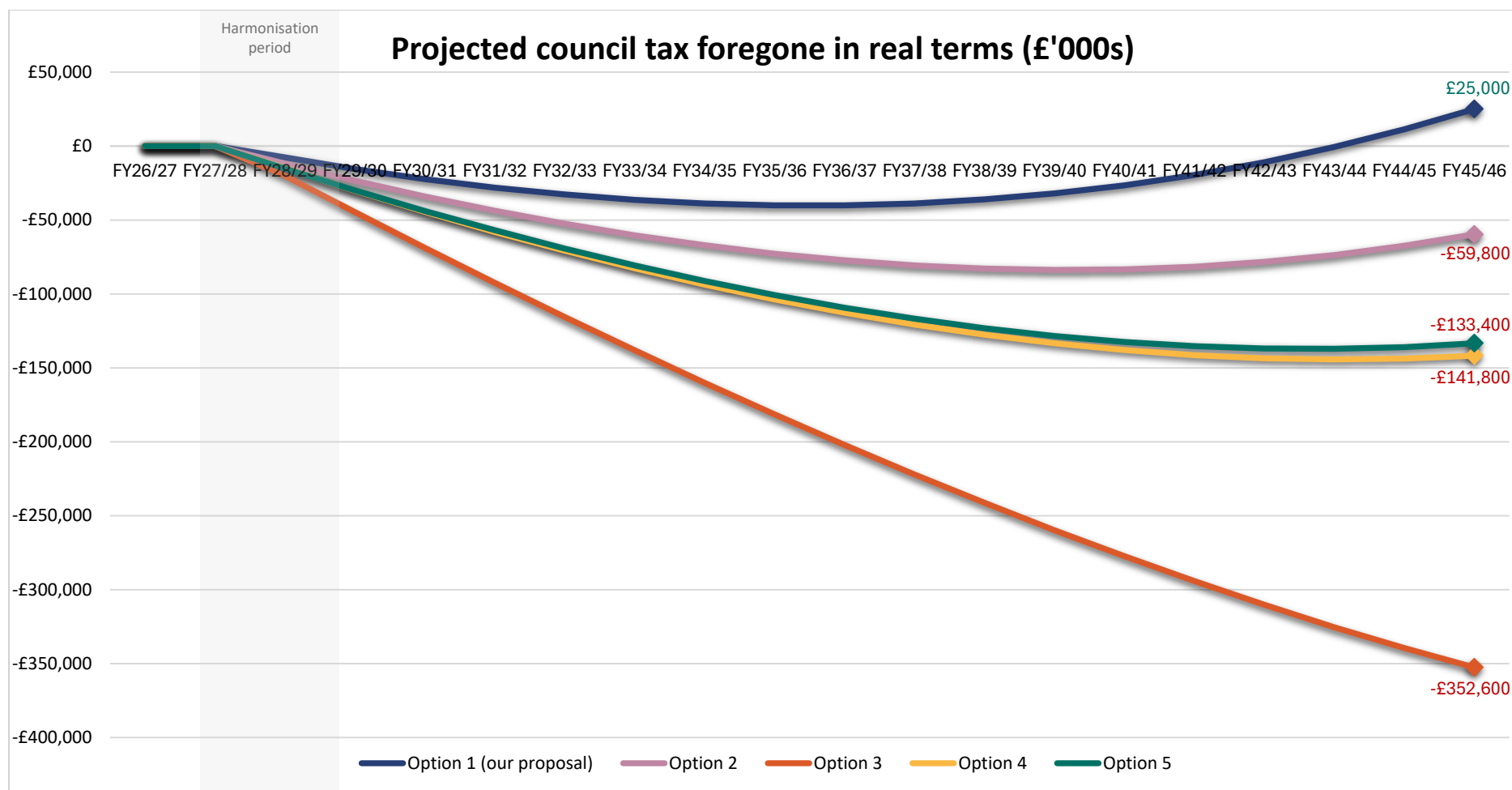


Figure 32: potential real terms cost of council tax harmonisation across the Staffordshire and Stoke-on-Trent area, relative to the current system of two-tier local government.

Our proposed option is the only net positive option (+£25M). Note that council tax harmonisation is already included in the financial sustainability baseline for each authority and these are not additional costs or benefits for each authority. This chart visualises the risk to council tax in moving away from the current two-tier system, and the relative capacity to raise council tax in different options.

7.4.2. Benefits

Benefits modelling for our proposal indicates total recurring annual benefits rising to £22.6M across the Staffordshire and Stoke-on-Trent area. Benefits realisation is phased, increasing year-on-year until full realisation in FY35/36:

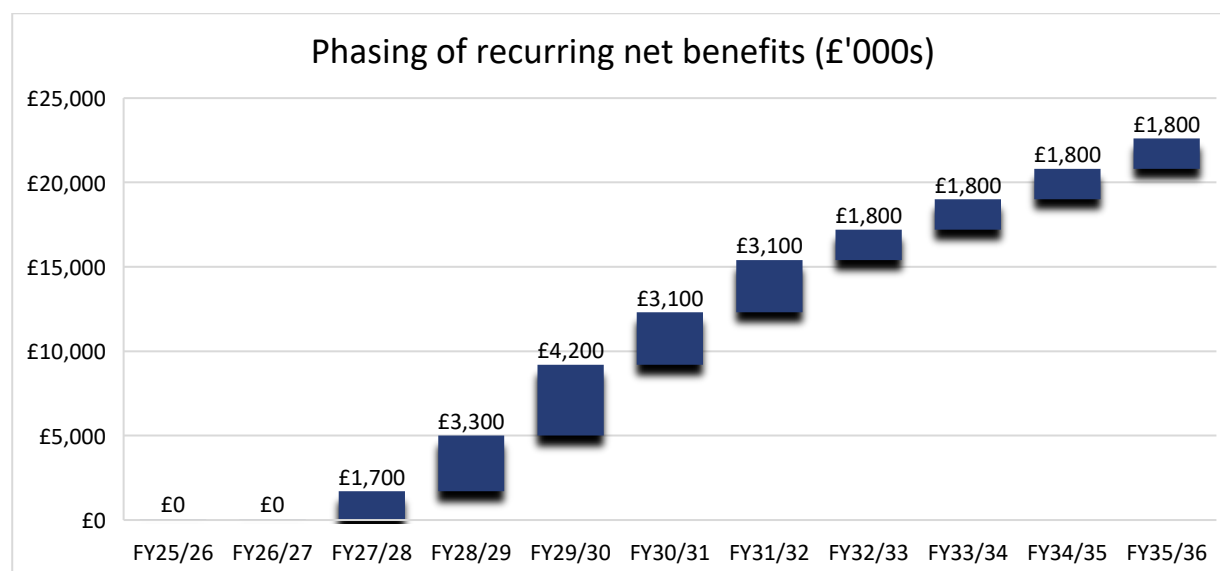


Figure 33: phasing of recurring transformation benefits across Staffordshire and Stoke-on-Trent, rising to £22.6M per annum by FY35/36

The table below breaks down these benefits, by adding the share of transformation benefits applicable to each proposed authority to the financial sustainability baseline of that authority. The forecast period is extended to the end of the transformation in FY35/36 to model the full benefits realisation period.

Table 5: structural position of proposed authorities, after transformation benefits. This adds the share of full transformation benefits in each authority to their financial sustainability baseline presented in Table 4

Proposed unitary	Structural position at the end of the forecast period after transformation (FY35/36)	
	(Deficit)/Surplus £M	Per capita
A	£0.8M	£7
B	£30.4M	£82
C	£23.1M	£64
D	£14.4M	£44

Note that the summary of district and borough core performance (see District and borough services section) demonstrate varying performance levels and value for money (see Appendix 1: financial model methodology, part 4). The approach to harmonising operations and performance levels will present choices at each authority to reconcile target performance and value for money from existing authorities, and moving towards improved performance is likely to erode financial benefits in new authorities. Newcastle-under-Lyme Borough Council, as a continuing authority, would not be exposed to this risk.

7.4.3. Implementation costs

Indicative one-off implementation costs are as follows:

Table 6: implementation costs of our proposed option with lower and upper cost ranges

Cost group	Cost sub-group	Lower range (£M)	Upper range (£M)
Transition	Shadow authorities	1.8	2.1
Transition	Election to shadow authorities	1.9	2.2
Transition	Programme delivery	9.4	11.0
Transition	Redundancy and pension strain	3.2	3.8
Transition	ICT consolidation	14.2	16.7
Transition	Branding, communications and engagement	1.5	1.7
Transition	Creation of new councils	2.2	2.6
Transition	Closedown of existing/shadow councils	1.0	1.2
Transformation	Programme delivery	8.0	9.4
Transformation	Redundancy and pension strain	4.6	5.4
Transformation	ICT consolidation	15.2	17.8
All	Contingency	3.1	3.7
Total one-off implementation costs		66.1	77.7

Upper ranges are included in financial models to make prudent estimates, and the chart below demonstrates that these costs are likely to be incurred earlier in the LGR process but will not be incurred simultaneously. These have been modelled over a period of five years and allocated to individual proposed authorities based on population relative to the change (see Appendix 1: financial model methodology). Of the £77.7M upper range one-off costs, £8.4M are allocated to the Newcastle-under-Lyme unitary (unitary A) on this basis.

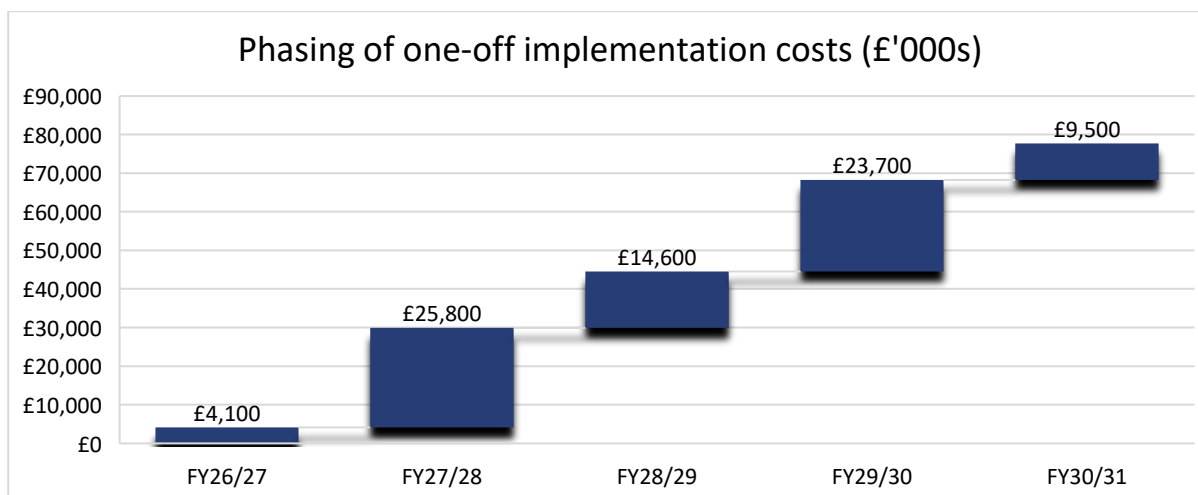


Figure 34: phasing of upper range £77.7M one-off implementation costs across Staffordshire and Stoke-on-Trent

It should be noted that the opportunity costs of council tax foregone are not recognised as a cost because it is a recurring choice for future authorities, not a programme cost, and is not a component of net operating expenditure (but this is accounted for in stage 1 of our financial modelling approach, the financial sustainability baseline).

Each authority in our proposal is forecast to run a surplus from FY31/32 onwards after implementation costs have been fully incurred.

7.4.4. Overall summary

As per the Methodology section, each of the outcomes of three stages to financial modelling have been brought together to into an overall MTFP model covering the financial sustainability baseline, transformation benefits and one-off costs. These outcomes have been summarised in previous sections and demonstrate that all authorities in the proposed option are likely to be sustainable in the medium-to-long-term.

This produces a unique 10-year summary for each proposed authority in each option, which has been used as a basis to further analyse reserves (as well as debt). However, forecasting reserves and their potential use is challenging due to a number of factors including:

- Vesting day is more than two years away and reserves are, in part, for purpose of buffering the organisation against events of varying likelihood and impact
- General reserves are set by policy and risk appetite of existing authorities
- Earmarked reserves are held for specific purposes which may not be relevant for future authorities and/or relate to strategic choices of the current authority
- Allocation of reserves at Staffordshire County Council will require detailed and pragmatic conversations depending on their current and future purpose, as well as understanding assets which are not divisible or less liquid
- Hypothecation exists on various reserves, which may or may not be altered through a once-in-a-generation LGR process

General and earmarked revenue reserves have been summarised for end FY24/25. Capital reserves and grants unallocated have also been included on the basis that they may be repurposed in an LGR

context but school balances and HRA balances are considered out of scope. This has identified just over £945M in usable reserves across Staffordshire and Stoke-on-Trent at the start of FY25/26.

Disaggregating Staffordshire County reserves on a population basis creates usable reserves of between £591 and £875 per capita in each of the four proposed authorities as a starting point for detailed conversation on allocating reserves once the final format for reorganisation is known (for example, by considering specific demand pressures in each geography for contextual earmarked reserves). The MTFP model also assumes a minimum working balance in each authority based on 10% of adjusted forecast net revenue expenditure in each authority (see Appendix 1: financial model methodology for detailed explanation of working balance and reserves modelling).

This demonstrates the east/west configuration in option 3 is most likely to evenly distribute and maintain reserves across all proposed authorities. Other options are likely to see one proposed authority needing to address timing differences arising from transformation costs and subsequent benefits. These requirements are generally modest (i.e. cumulative maximum 3% of revenue financing for a scenario of Newcastle-under-Lyme in the proposed option).

By assuming that timing differences are first met by structural surpluses and the working balance, and then met by earmarked reserves, an *indicative* forecast reserves position has been created for each authority to test viability. This is as follows for the proposed Newcastle-under-Lyme unitary (unitary A) and provides a sense of how frontloaded one-off costs create timing differences to transition and transformation activity, with reserves *potentially* recovering in the long-term provided transformation benefits materialise:

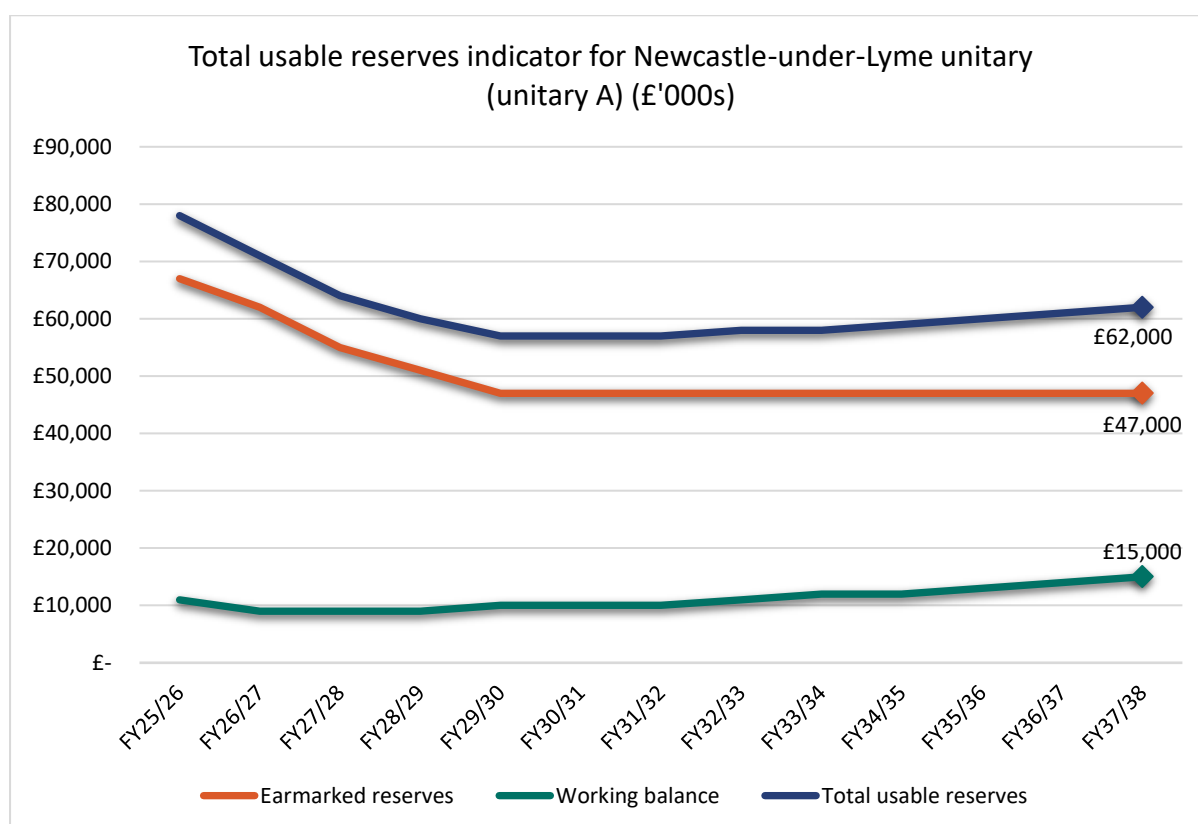


Figure 35: total usable reserves indicator for Newcastle-under-Lyme unitary (unitary A)

Note that balances prior to vesting day reflect the disaggregated position of Newcastle-under-Lyme and Staffordshire County Council, but are shown to reflect the likelihood of some transition costs being incurred in the years prior to vesting day.

In reality, a number of options to meet such challenges will exist and shadow/new authorities will consider all mitigating actions, including:

- Securing additional funding for change and transformation (one of our key asks of Government)
- Detailed conversations to disaggregate reserves differently and better align to authorities likely to experience these timing differences
- Receipts from asset consolidation and disposal
- Adopting a higher risk working balance position (at least temporarily)
- Repurposing earmarked reserves temporarily or permanently
- Temporary borrowing

8. Democracy

Key criteria:

- *Reflects and empowers Staffordshire's unique local identities and places*
- *Provides strong democratic accountability, representation and community empowerment*
-

8.1. Local identity

Place names, postal addresses, and civic institutions

The preferred option for reorganisation is a unitary authority based on the existing footprint of Newcastle-under-Lyme Borough Council. This would preserve existing place names, postal addresses, and civic institutions, ensuring continuity of local identity.

Mixed governance landscape

Newcastle-under-Lyme includes both parished and unparished areas. The reorganisation proposals acknowledge this diversity and suggest that community governance models (e.g., parish councils, area committees) will need to be tailored to reflect local needs and ensure equitable representation.

Preserving local voice

Mechanisms such as neighbourhood forums, area committees, and enhanced scrutiny functions are being considered to ensure that local voices are heard. The Borough Council has emphasised the importance of maintaining proximity between decision-makers and communities.

Accountability mechanisms

The new governance model would retain and potentially strengthen existing standards regimes, overview and scrutiny committees, and public engagement processes. These would be embedded in the constitution of the new authority to ensure transparency and accountability.

8.2. Councillor warding and numbers

Fair and effective representation

The Local Government Boundary Commission for England (LGBCE) will play a key role post-establishment in reviewing ward boundaries to ensure fair representation. Interim arrangements will be proposed by the authority itself.

Electoral warding model

The current borough has 44 councillors across 21 wards. Under a unitary model, warding may initially reflect existing arrangements, with adjustments made following a full boundary review. The preference is for continuity where possible.

Proposed councillor numbers and ratios

While final numbers are subject to review, the current ratio of approximately 1 councillor per 3,000 residents may be retained or adjusted slightly to reflect governance needs.

Role of third parties

The LGBCE will advise on warding and representation post-implementation. The Ministry of Housing, Communities & Local Government (MHCLG) will oversee the structural changes and statutory orders.

8.3. Maximising devolution impact in the region

Working within the MSA framework

Newcastle-under-Lyme supports participation in an MSA covering Staffordshire and Stoke-on-Trent, without necessarily requiring full reorganisation. This model would allow for regional collaboration on transport, infrastructure, and economic development.

Constitutional considerations

The Borough Council has expressed concern about the imposition of an elected mayor and additional governance layers. It supports inclusive governance through the Staffordshire Leaders Board and opposes arbitrary population thresholds for unitaries.

8.4. Continuing Authority Model

Newcastle-under-Lyme Borough Council as a continuing authority

If Newcastle-under-Lyme becomes a unitary authority, it would assume full responsibility for services currently split between borough and county levels. This includes social care, highways, and education. The council's constitution, delegations, and statutory duties would be revised accordingly.

Ceremonial and historical governance

The Borough Council has committed to preserving ceremonial roles which hold great importance in Newcastle-under-Lyme such as Aldermen and our Burgesses. Further work is planned post-submission to define how these traditions will be maintained within the new structure. This proposal is the only submission which enables a clear route to maintain these arrangements.

8.5. Area Committees: role and relevance in a unitary

Overview

Area Committees are sub-council structures designed to bring decision-making closer to communities. In the context of local government reorganisation, they serve as a key mechanism for maintaining local identity, enhancing democratic engagement, and ensuring responsiveness to place-based needs. This links to the Borough Council's strong preference for existing elected membership arrangements to be maintained.

Functions and powers

Area Committees typically have delegated authority over:

- Local planning and enforcement (e.g. Eastleigh Borough Council)
- Traffic and highways decisions (e.g. Stockport MBC)
- Community grants and Section 106 allocations
- Naming streets, managing parks, and overseeing leisure facilities
- Consulting on strategic issues and representing local views to Cabinet or Council

Governance benefits

- **Democratic accountability:** Councillors on Area Committees are directly elected and accessible, fostering transparency and trust
- **Community engagement:** committees often host public forums and invite local stakeholders, including voluntary sector representatives
- **Preserving local identity:** Area Committees help maintain the distinctiveness of towns, parishes and neighbourhoods within a larger unitary structure

Examples of effective use

- Eastleigh Borough Council operates five Area Committees with their own budgets and decision-making powers over planning, traffic, and leisure
- Stockport MBC uses seven Area Committees to manage highways, parks, and school governor nominations
- Ashfield District Council delegates grant aid, community consultation, and capital bids to its Area Committees

Relevance to Newcastle-under-Lyme

Given the Borough's mix of parished and unparished areas, Area Committees could provide a flexible and inclusive model for local governance. They would:

- Ensure local voices are heard in both urban and rural settings
- Support community-led decision-making
- Act as a bridge between MSA functions and neighbourhood priorities

9. Our plan for transition and implementation

Key criteria:

- *Unlocks the full benefits of devolution*
- *Delivers high-quality, innovative and sustainable public services that are responsive to local need and enable wider public sector reform*

Successfully delivering LGR in Staffordshire requires a structured and phased plan that ensures stability while providing a platform for transformation. Our approach will prioritise service continuity, ensuring that our residents continue to receive the support they rely on throughout the reorganisation process.

Our guiding principles for managing this transition will be:

- **Continuity first:** we will prioritise uninterrupted delivery of critical services from day one, supported by robust planning and insights from other reorganisations. This includes ensuring readiness for key operational elements such as contact channels, case management systems, and care package procurement

- **Consistency for vulnerable people:** recognising that stability of relationships and placements is vital for positive outcomes, we will adopt a pragmatic approach, particularly in Children's Services, to maintain continuity of care – even if this temporarily spans new administrative boundaries
- **Efficiency and improvement:** at the right time, we will review service models and working practices to identify opportunities for greater effectiveness. Building on strong performance and existing partnerships, we will consider shared arrangements, such as safeguarding boards or commissioning frameworks, where they deliver clear benefits

Managing change on this scale demands strong leadership, disciplined programme management, and close collaboration. Drawing on lessons from other reorganisations, including our One Council programme which was praised for its effectiveness in our recent Peer Review, we will invest early in transformation capacity, financial governance, and robust oversight positioning us to navigate challenges and ensuring resilience and readiness from day one. We will make best use of existing skills and resources across councils and secure specialist support where needed.

9.1. Programme Management Office (PMO)

Once a formal decision is confirmed on the future governance arrangements, a dedicated Programme Management Office (PMO) will be established to lead and coordinate the transition. Acting as the central coordination point for planning, oversight, and delivery throughout the transition period, the PMO will provide structure and alignment across all activities, ensuring service continuity while transformation progresses. Its responsibilities will include monitoring progress, managing interdependencies, and supporting collaborative decision-making with partner councils.

To deliver this effectively, the PMO will bring together experienced programme and change professionals, project leads, and technical specialists from within the council, supplemented by targeted expertise where required. This approach ensures the right capacity is in place at the right time to manage complexity, maintain momentum, and address risks promptly. By operating within a clear governance framework and phased delivery plan, the PMO will enable a smooth transfer of responsibilities and create a strong foundation for more integrated and efficient services.

9.2. Disaggregation of County services

The transfer of upper-tier services from the County Council, particularly in areas such as social care, requires careful planning to protect continuity and avoid disruption for residents. Where appropriate (see Service delivery and ways of working section) we will explore shared service arrangements to achieve efficiencies and economies of scale, while eliminating duplication and ensuring resources are directed to frontline delivery within local communities.

9.3. Stakeholder engagement

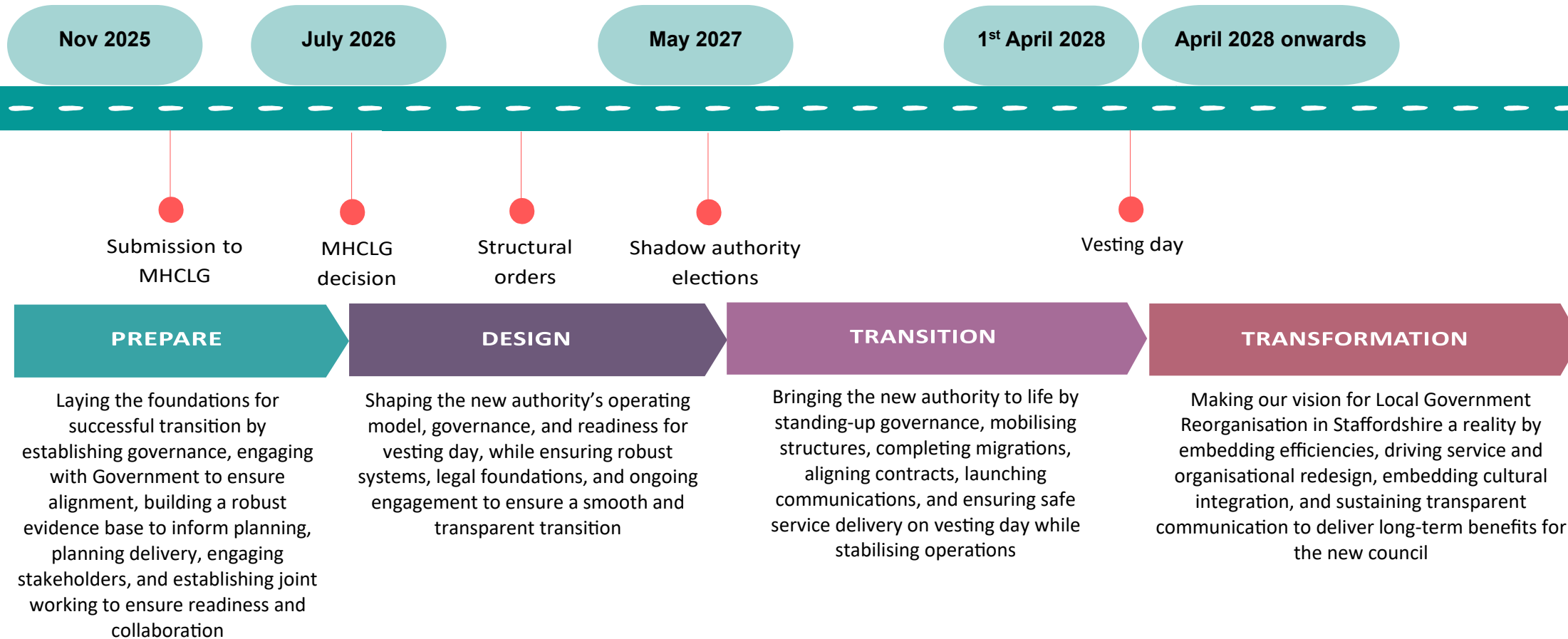
Engaging stakeholders throughout the transition will be critical to maintaining confidence and ensuring successful delivery. Our approach will focus on clear, consistent communication, proactive collaboration, and transparency at every stage. We will provide regular updates, host workshops to clarify service changes, and create opportunities for feedback and co-design. Strong partnerships will be reinforced, and new relationships cultivated to support long-term success. Engagement will extend across staff, unions, partners, residents, and community organisations, ensuring that

decisions are informed by local needs and evidence. By embedding these practices, we will build trust, foster co-operation, and create a shared sense of ownership in the change process.

9.4. Benefit realisation

To ensure benefits are realised and sustained, we will implement a robust benefits management framework. This will include clear success measures, defined KPIs, and transparent reporting to stakeholders. Progress will be tracked through regular updates, supported by a public-facing dashboard and annual reviews, with interim updates provided if significant changes occur. This approach will give assurance that the programme is delivering on its commitments and that benefits are embedded into everyday operations.

9.5. Timeline & milestones



Prepare

- **Establish governance:** create joint governance structures and a Programme Management Office (PMO) to oversee delivery, maintain oversight, and support structured change management
- **Engagement with Government:** maintain open dialogue with central government to align on legislative requirements, funding, and timeline
- **Develop the baseline:** undertake comprehensive data mapping of services, assets, contracts, systems, and workforce for all impacted organisations to inform the proposal and future implementation planning
- **Action plans and implementation programme planning:** design thematic action plans and a detailed implementation roadmap to guide workstreams and ensure readiness for transition
- **Resident, stakeholder and internal communication and engagement:** launch early engagement campaigns to raise awareness, build trust, and foster cooperation among residents, staff, elected members, and trade unions
- **Joint working and data sharing:** to inform the proposal and initial implementation plan, identifying early opportunities for further joint working. Encourage cross-Council collaboration and share data to identify early opportunities for integration and efficiency gains
- **Workforce planning:** kick off the development of a long-term workforce planning strategy, aligning with regional and national approaches where required. This will prepare us in growing and/or acquiring the capability and talent needed in a unitary authority. Coordinated approaches across regions in England will be critical to ensure collaborative, rather than competing, workforce development and capability building as a common 2028 vesting day approaches

Design

- **Decide on the vesting day operating model:** develop the Target Operating Model (TOM) and organisational design for vesting day for the new authority, covering governance, service delivery, workforce, and digital systems
- **Governance:** establish interim governance arrangements and draft the Structural Change Order (SCO) to provide the legal basis for transition and shadow authority formation, ensuring key stakeholders are engaged in vesting day operating model delivery
- **Preparations for vesting day:** plan and test critical elements – legal orders, financial systems, ICT infrastructure, branding, and service continuity – to ensure operational readiness
- **Ongoing communication and engagement:** continue proactive engagement with residents, staff, and partners to maintain transparency and confidence during the transition

Transition

- **Stand up governance:** activate shadow governance structures and Joint Committees to oversee transition and prepare for vesting day
- **Mobilise structure:** implement interim organisational arrangements, confirm leadership appointments, and begin staff transition planning

- **Complete identified and agreed migration activities:** transfer ICT systems, data, and customer-facing platforms to new infrastructure, ensuring security and continuity
- **Contracts, procurement and frameworks:** align/rationalise contracts and procurement frameworks to enable efficient operations and deliver any early savings
- **Roll out new communications:** introduce new communication channels for residents, staff, and partners to reinforce identity and clarity
- **Deliver vesting day:** formally launch the new authority, ensuring safe and legal delivery of services from day one
- **Monitor, manage and stabilise:** focus on maintaining service continuity and resolving immediate post-launch issues before moving into transformation

Transformation

- **Consolidate savings and efficiencies from transition:** embed financial and operational benefits identified during reorganisation, including procurement and workforce efficiencies
- **Focus on transformation:** drive forward operating model and organisational design activities for the new council, service redesign, digital innovation, and workforce reform to realise long-term benefits
- **Align cultures and behaviours:** focus on accelerating the cultural integration of the proceeding organisations through strong engagement and collaboration. Identify new values, behaviours and the resulting culture required to support the new council and ensure effective performance management frameworks are in place to facilitate their adoption
- **Communication and engagement on progress:** maintain open communication with stakeholders on achievements, challenges, and future plans to build trust and accountability

10. Risks, dependencies and mitigations

Key criteria:

- *Unlocks the full benefits of devolution*
- *Delivers high-quality, innovative and sustainable public services that are responsive to local need and enable wider public sector reform*
- *Secures financial efficiency, resilience and the ability to withstand financial shocks*

Effective risk management will be central to delivering a smooth and successful transition. Our approach will apply robust principles to identify, assess, and mitigate potential issues early, ensuring continuity of services and confidence in delivery.

Risks will be considered at every level; strategic, operational, and service-specific, while also capturing cross-cutting dependencies that span multiple areas of the organisation. A single, consolidated risk register will be maintained through the Programme Management Office, with clear ownership, mitigation strategies, and contingency plans. This structured approach will provide transparency, accountability, and assurance throughout the implementation process.

10.1. Risks and mitigations

Financial risks and budgetary pressure

There is a risk of budget overspend, misaligned financial modelling, and underestimated transition costs (e.g., redundancy, IT upgrades). Differing reserves, debt levels, and council tax rates may complicate harmonisation, while failure to realise projected savings could strain resources and damage reputation.

We will develop a robust MTFS with contingency buffers, maintain clear budget separation, and track savings through a benefits framework. Financial models will be regularly reviewed, with independent assurance from external advisors. We'll monitor implementation costs, build in contingency for shortfalls to ensure a stable financial foundation.

This financial governance and risk management must also extend to the oversight of preceding council financial spending and commitments to ensure only appropriate revenue and capital commitments are made in the transition process.

Service disruption and demand resilience

The scale and complexity of reorganisation may disrupt statutory services and reduce capacity to respond to sudden demand spikes. Vulnerable residents are particularly at risk if safeguarding, health, or social care pathways are interrupted. Without coordinated joint working and robust contingency planning, service continuity and public confidence could be compromised.

We will establish transition boards with clear service continuity plans and agree corporate performance frameworks early to maintain consistent reporting. Changes will be phased to avoid

overwhelming teams, and key performance indicators will be closely monitored to quickly address any service dips.

Staff morale, turnover, and workforce stability

Uncertainty around roles and structures may lead to increased staff sickness, turnover, and reduced morale. This could result in the loss of critical skills and institutional knowledge, placing pressure on remaining teams and affecting service delivery.

We will build on our strong existing programmes of staff engagement and will work with all of our staff and trades unions to build trust, equip leaders to support change, and identify key roles early to retain critical staff and transfer knowledge. Teams will be supported through engagement activities and temporary resources. Our officer leadership and HR will act strategically to map roles, shape our talent strategy and Employee Value Proposition (EVP), and develop a wellbeing and belonging approach based on existing good practice.

Governance and legal

A loss of local identity and democratic engagement, particularly in unparished areas. Communities may feel disconnected from decision-making if governance structures such as area committees or neighbourhood forums are not implemented effectively. This could lead to reduced trust, lower participation in local democracy, and dissatisfaction with the new arrangements.

We will embed robust local governance mechanisms within the new authority's constitution from the outset. This includes establishing area committees with delegated powers, ensuring parish councils are supported, and creating neighbourhood forums for unparished areas.

Collaboration

A lack of collaboration across Staffordshire councils creating delays in decision-making and implementation, leading to inefficient resource allocation, duplicated efforts, and instability in service delivery.

We will focus on building consensus and collaboration across all councils. Joint workshops will be held to agree on a shared strategic direction and guiding principles, ensuring alignment and reducing the potential for conflict. Strong collaborative arrangements and governance structures will be established.

ICT, data migration, and digital infrastructure

The separation of legacy systems, and subsequent re-integration with the future council footprints, introduces risks of data loss, system failure, and service disruption. Poor data collection, analysis and planning can lead to significant transitional risks while inconsistent data formats and supplier capacity constraints may delay transformation efforts and compromise resident data security.

Scale and complexity

The sheer scale of reorganisation may be underestimated, leading to misjudged timelines and costs. Without a robust change management approach, delivery could become fragmented, communication inconsistent, and benefits delayed or lost.

We will set up a well-resourced change management function with clear leadership and flexible capacity to effectively support programme delivery.

Delayed realisation of benefits

A focus on structural change over transformational outcomes may result in missed opportunities for innovation, efficiency, and service improvement.

We will embed benefits tracking into programme governance and make sure transformation initiatives are clearly aligned with LGR milestones. This will help maintain focus on outcomes and ensure we can demonstrate progress and value throughout the transition.

10.2. Dependencies

Government criteria interpretation

The proposal is aligned with current Government tests, but any change in interpretation will require clear, consistent guidance to ensure consistent application across Staffordshire.

Transition funding constraints

Government policy expects transition costs to be met from local capital receipts, which may limit investment in strategic priorities. Mitigations include reserve protection, phased asset disposal, benefit tracking, and a request for time-limited transitional funding with milestone-linked drawdowns. We have consistently called for Government to fully fund any costs of reorganisation to address this risk to our strong historical stewardship of public finances, assets and resources.

Partner and regulatory alignment

Effective implementation relies on strong collaboration with key partners, including Staffordshire & Stoke-on-Trent ICB, Staffordshire Police and Staffordshire Fire & Rescue. Regulatory oversight from bodies such as the CQC, Ofsted, and HMICFRS must also be integrated.

The Borough Council builds from a strong foundation of effective partnership working, with many effective multi-agency arrangements, ranging from an effective Newcastle Partnership, to co-located and integrated service delivery with Staffordshire Police and Staffordshire County Council, through to our leadership of national-level incidents including recent post-Grenfell building safety and the ongoing resolution of Walleys Quarry, which has seen the Council working in genuine partnership with the County Council, Police, Fire, ICB, Environment Agency, UKHSA and other key agencies, as well as our community.

We see a real opportunity to integrate our regulatory functions to allow the new unitary council to deal speedily with those who would detract from our civic pride, including rogue traders, unlawful encampments and community safety. Whilst instances of there are thankfully rare, we will ensure we use all powers at our disposal for the benefit of all who live, work in and visit our place.

11. Our asks of Government

To summarise the 10 key asks of government set out in this proposal, we note that:

1. The Government has an opportunity to pause, think again and listen to the voices across Newcastle, Staffordshire and the wider region calling for the LGR process to be halted and the two-tier system of local government retained
2. That Newcastle-under-Lyme serves as a model of well-run, effective delivery of services – working with partners in a dynamic and efficient, but voluntary and participatory way and should be retained in any future model of local government
3. That if Government decides to continue with reorganisation in Staffordshire and Stoke-on-Trent, it must also commit to fully fund these changes, so that they do not fall as a burden on local taxpayers
4. That Government holds meaningful consultation with our residents and stakeholders in reaching its decisions
5. That Government notes the cross-party support for, and many positive examples of, an effective small unitary approach to local government
6. That Government recognises the deep history and traditions of our geography, which spans nine centuries and incorporates historic functions – such as burgesses and almshouses which are more than ceremonial, they are an active part of our community's identity and delivery
7. That Government allows us to progress devolution ahead of any forced changes to local government arrangements, bringing clarity for all stakeholders and enabling us to support the national mission for economic growth
8. That Government works with us to protect the historic civic arrangements in Newcastle-under-Lyme which will be best protected by a single unitary council arrangement
9. That Government recognises the essential need to have an effective number of elected members to ensure genuine local accountability
10. That opportunities for shared service delivery across multiple unitaries are recognised, supported and incentivised to create efficiencies and reduce the need for costly disaggregation



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12. Appendices

[Appendix 1: financial modelling methodology](#)

[Appendix 2: detailed financial modelling outcomes](#)

[Appendix 3: existing service delivery models](#)

[Appendix 4: detailed engagement analysis and outputs](#)

[Appendix 5: education, adults and children's insight](#)

[Appendix 6: local democracy \(historical context/roles\)](#)

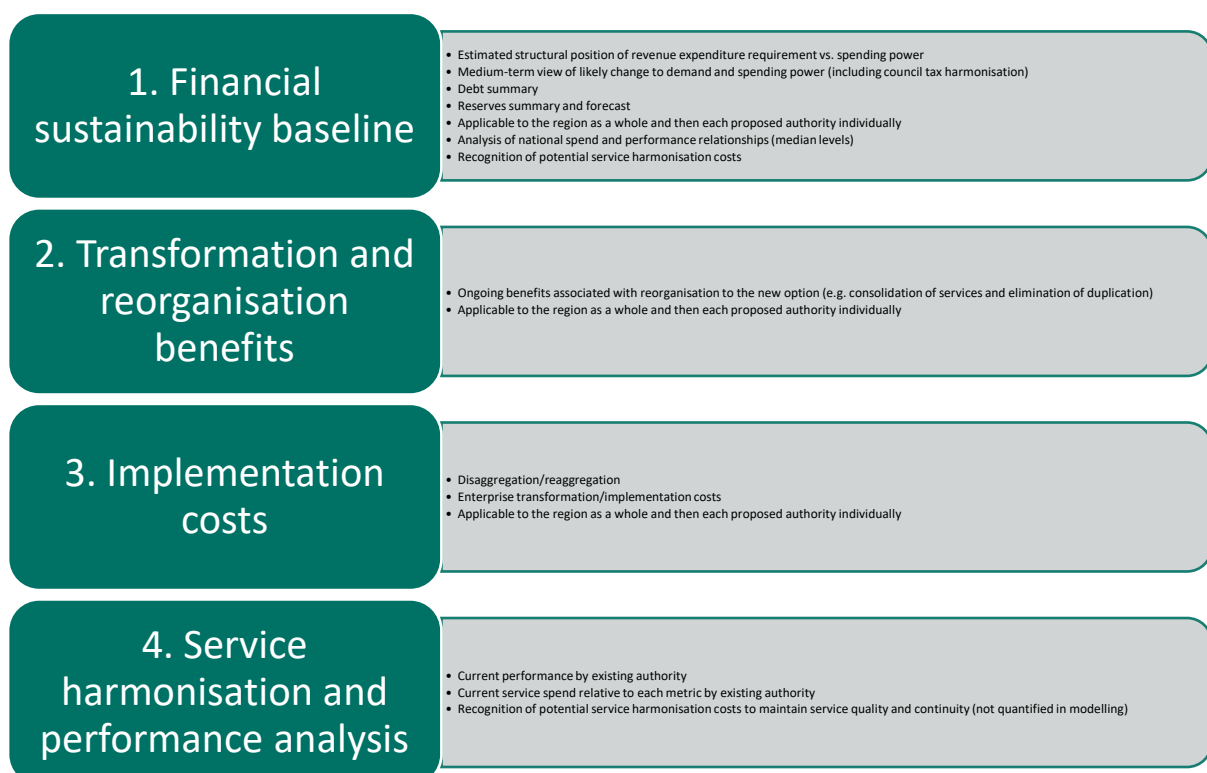
[Appendix 7: interim plans and feedback](#)

[Appendix 8: Equality Impact Assessment \(EIA\)](#)

Appendix 1: financial model methodology

Four stages of financial modelling have been adopted to transparently separate elements of costs and benefits:

- **Financial sustainability baseline:** the ongoing financial sustainability of each proposed authority across the MSA region, focusing on indicative structural challenges for each proposed authority and creating equitable distribution of likely net expenditure requirements and core spending power at each authority. This serves as a baseline from which to apply transformation benefits and delivery costs
- **Transformation and reorganisation benefits:** ongoing/revenue structural revenue benefits and disbenefits associated with LGR, enabled through consolidation, elimination of duplication and ways of working at optimum scale. The annualised benefits delivered are expected to increase of the medium-term as transformation is implemented
- **Implementation costs:** one-off delivery costs of delivering transformation, including disaggregation and reaggregation of services, also expected to be incurred over a medium-term period
- **Service harmonisation and performance analysis:** value for money assessments of existing authorities using common, nationally available performance metrics and break downs of service expenditure. Analysis of the relationship between performance and expenditure has provided a basis to identify where there are financial risks in harmonising service performance



This has been constructed into an overall MTFP model; a 5-10 year forecast for each proposed authority in each option.

While transformation is the mechanism for realisation of genuine public sector benefits (both financial and non-financial), it is acknowledged that estimates at this stage will require significant testing and validation with data not available to Newcastle-under-Lyme Borough Council during this phase of the LGR process. However, analysis demonstrates that the following are most likely to determine viability of all options:

- Financial sustainability baseline (service demand and core spending power)
- Outcome of the Fair Funding Review 2.0¹²

Part 1: financial sustainability baseline

Newcastle-under-Lyme Borough Council's approach to financial sustainability modelling focuses on structural revenue projections across the Staffordshire County Council and Stoke-on-Trent City Council area. This can be summarised as follows:

1. Summarise revenue expenditure of existing authorities
2. Summarise spending power of existing authorities
3. Allocate drivers, and values of those drivers, as a basis to disaggregate revenue expenditure and spending power of existing authorities
4. Create 'building block' geographies that can be constructed into proposed authorities for all options (district geographies have been used as building blocks)
5. Map 'building block' geographies to proposed unitary authorities for each option
6. Disaggregate revenue expenditure and spending power for 'building block' geographies
7. Restate revenue expenditure and spending power for proposed authorities
8. Forecast critical changes to core spending power in future years
9. Model council tax harmonisation schedule
10. Forecast revenue expenditure and spending power for a five year period and identify structural revenue challenge (i.e. the value of maximum projected difference between revenue expenditure and spending power, and the year in which it occurs)

Note that Shropshire Council and Telford & Wrekin Council are included in the financial modelling approach for completeness of the MSA region.

The following sections break down these steps in more detail and indicate the source data.

Part 1A: structural revenue projections

1. Summarise revenue expenditure of existing authorities

Restate FY25/26 revenue expenditure returns (RA returns)¹³ into a structured summary of net income and expenditure in a standardised format similar to a statement of accounts.

2. Summarise spending power of existing authorities

Restate FY25/26 revenue financing returns (SG returns)¹⁴ into a structured summary of grants outside Aggregated Expenditure Finance (AEF), grants inside AEF and revenue expenditure financing.

3. Allocate drivers, and values of those drivers

Allocate every RA/SG code with a driver to disaggregate spend. For example, Children's Social Care (RA code 330) is disaggregated using a population-IMD composite. List of drivers used (some of which have been calculated into composites):

- Population by ward (by age and sex)¹⁵
- Forecast population (2032)¹⁶
- Homeless cases accepted (FY23/24)¹⁷
- Tax base (2024)¹⁸
- Tax base (2021)¹⁹
- IMD²⁰
- Collection rates²¹

4. Create 'building block' geographies

Use district and borough footprints as building block geographies.

5. Map 'building block' geographies to proposed unitary authorities for each option

Mapping of ward and population data for 'building block geographies' (from step 3 above) to new proposed unitary authorities for each option.

6. Disaggregate revenue expenditure and spending power for 'building block' geographies

Disaggregate Staffordshire County Council revenue expenditure and spending power across corresponding districts and boroughs using allocated drivers and associated values of those drivers (from step 3 above).

7. Restate revenue expenditure and spending power for proposed authorities

Sum related component financial data for each area to restate existing FY25/26 position for proposed authorities in each option (using the mapping from step 5 above).

8. Forecast critical changes to core spending power in future years

Forecast key spending power components from FY26/27 onwards, disaggregating into 'building block' areas and reaggregating to proposed unitary authorities for each option as above (i.e. using the same methodology/drivers/driver values).

9. Model council tax harmonisation

Model council tax harmonisation using combined precepts (i.e. sum of upper and lower tier precept, excluding parish councils and any other precepting authority)²² of existing authorities for each 'building block' geography, in combination with council tax base (for collection purposes) and collection rates (existing local authority CTR1 returns)²¹.

Council tax decisions will ultimately be decided by Members of the new authorities. However, the following assumptions demonstrate that harmonisation in all options can be achieved within two council tax setting cycles and demonstrate council tax foregone in each option:

- No council tax precepts are reduced
- Maximum increases of 2.99% in districts and 4.99% in upper tier authorities are applied by existing authorities prior to vesting day of new authorities
- Maximum 4.99% increases are applied to the lowest combined precept in each proposed authority
- Precepts in the remaining part of each authority are frozen, or applied with a reduced increment in the year it is exceeded by the lowest precept in the proposed authority, until all precepts are equalised

10. Forecast revenue expenditure and spending power for a five-year period

Calculate the difference between projected revenue expenditure and spending power by financial year by:

- a) Creating a view of FY25/26 using current tax base and adjusting the following which are assumed to indicate existing structural pressure:
 - i. Transfers to reserves (surplus assumed to reduce structural pressure) or from reserves (deficit assumed as a pressure to be met from reserves)
 - ii. Capital receipts used to finance revenue expenditure under receipts flexibility (deficit assumed to increased structural pressure)
 - iii. Netting off expenditure capitalised by a direction under Section 16(2)b), which is assumed to include existing Exceptional Financial Support (EFS) (deficit assumed to increase structural expenditure)
- b) Forecast FY25/26 onwards by:
 - i. Multiplying the FY25/26 revenue expenditure requirement, which has been adjusted for likely service demand, annual OBR inflation estimates²³ and annualised forecast percentage population increase
 - ii. Forecasting spending power by:
 - o Introducing forecasts of major funding components (e.g. Retained business rates and RSG) where they are known; or
 - o Incrementing by CPI inflation forecasts for core grants in the absence of forecasting data
 - iii. Introducing maximum council tax attainable from the harmonisation schedule, applying a further increase to the taxbase based on actual average annual growth of Band D equivalent in the area of the proposed unitary over the last three years available (2021-2024)

Analyse largest structural gap by year, as a total, percentage revenue expenditure as per RA returns and as a deficit per capita.

Part 1B: debt and reserves modelling

The following sections break down steps in debt and reserves modelling and indicate the source data.

1. Summarise debt and investments

Summarise total debt and investments at each existing authority across (data does not distinguish between General Fund and HRA).²⁴

2. Summarise debt servicing

Summarise annual principal, leasing and interest payments as per FY25/26 RA returns at each existing authority.

3. Summarise usable reserves

Analyse current budget statements to estimate general revenue reserve, earmarked revenue reserves and usable capital reserves. School balances are excluded.²⁵

4. Disaggregation and reaggregation

Use of similar disaggregation and reaggregation principles and calculations as set out in sections part 1A to summarise debt/investments, annual debt servicing and usable revenue reserves in the context of the financial sustainability baseline.

5. Minimum working balance

Model a minimum working balance in each authority by taking 10% of approximate net operating expenditure. From RA returns, this is calculated as net revenue expenditure less the following (to approximate an appropriate base for a 10% minimum working balance):

- Housing benefits
- Precepts and levies (includes Parish precepts)
- Capital receipts used to finance revenue expenditure under receipts flexibility
- Netting off expenditure capitalised by a direction under Section 16(2)b)
- Specific and special grants inside AEF (where grants inside AEF are already offset within revenue expenditure)

The assumed minimum working balance increases in line with % revenue expenditure forecasts in overall MTFP modelling (see below).

Part 2: transformation and reorganisation benefits

Four areas of transformation benefits were assessed and disaggregated, to apply these benefits to the financial sustainability baseline of each proposed authority/geography:

1. Transformation benefits (see Service delivery and ways of working section for specific and contextual narrative for Staffordshire, supported by details of current collaboration in Appendix 3: background information on service delivery)
 - a. Service duplication: aggregating services run at district level in two-tier areas
 - b. Agile unitaries, service integration and local interventions: right-sizing the organisation for local interventions and integrating related services run across current two-tier areas (including asset rationalisation)
 - c. Joint working: sharing policy and operational resources in regional approaches in services benefiting from economies of scale and which support an effective MSA
 - d. Disaggregation disbenefits: loss of economies of scale in services currently run by Staffordshire County Council
2. Member consolidation
 - a. Basic allowances
 - b. Special responsibility allowances
3. Elections
4. Senior leadership consolidation

Transformation benefits

In each of the following areas, an estimate of controllable annual expenditure has been made by removing grants and funding (both inside and outside AEF) which are arguable directly attributable service areas to estimate controllable net expenditure in the base revenue for each of the proposed geographies. For example:

- Education service expenditure is adjusted to remove DSG, Pupil Premium Grant and Universal Infant School Meals funding
- Children's service expenditure is adjusted to remove Children's Social Care Prevention Grant funding

Note that no benefits have been applied to Education or Public Health in any scenario to take a conservative view in areas where there is less consensus and/or evidence in the right operating model and disaggregation disbenefits are applied to all upper tier services currently run by Staffordshire County Council, and noting that within Staffordshire, a high proportion of schools are managed through Multi-Academy Trusts.

The following table details application of benefits to this controllable expenditure in each option, which are applied to the current geographies after disaggregation and apportionment of Staffordshire County Council spend where applicable, to reflect integration and right-sizing opportunities. This also recognises the context at Stoke-on-Trent, to apply benefits prudently given the current demand pressures, financial support and existing unitary status. Where categories of expenditure are excluded, it is because no benefits are modelled:

RA service	Newcastle-under-Lyme	Cannock Chase	East Staffordshire	Lichfield	South Staffordshire	Stafford	Staffordshire Moorlands	Tamworth	Stoke-on-Trent	Shropshire	Option	Driver
Housing Services (GFRA only)		3.60%	3.60%	3.60%	3.60%	3.60%	3.60%	3.60%	1.20%		Option 1	Duplication
Cultural and Related Services		3.60%	3.60%	3.60%	3.60%	3.60%	3.60%	3.60%	1.20%		Option 1	Duplication
Environmental and Regulatory Services		3.60%	3.60%	3.60%	3.60%	3.60%	3.60%	3.60%	1.20%		Option 1	Duplication
Planning and Development Services		3.60%	3.60%	3.60%	3.60%	3.60%	3.60%	3.60%	1.20%		Option 1	Duplication
Central Services		3.60%	3.60%	3.60%	3.60%	3.60%	3.60%	3.60%	1.20%		Option 1	Duplication
Housing Services (GFRA only)	3.60%	4.80%	4.80%	4.80%	4.80%	4.80%	3.60%	4.80%			Option 2	Duplication
Cultural and Related Services	3.60%	4.80%	4.80%	4.80%	4.80%	4.80%	3.60%	4.80%			Option 2	Duplication
Environmental and Regulatory Services	3.60%	4.80%	4.80%	4.80%	4.80%	4.80%	3.60%	4.80%			Option 2	Duplication
Planning and Development Services	3.60%	4.80%	4.80%	4.80%	4.80%	4.80%	3.60%	4.80%			Option 2	Duplication
Central Services	3.60%	4.80%	4.80%	4.80%	4.80%	4.80%	3.60%	4.80%			Option 2	Duplication
Housing Services (GFRA only)	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	2.40%		Option 3	Duplication
Cultural and Related Services	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	2.40%		Option 3	Duplication
Environmental and Regulatory Services	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	2.40%		Option 3	Duplication
Planning and Development Services	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	2.40%		Option 3	Duplication
Central Services	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	2.40%		Option 3	Duplication
Housing Services (GFRA only)	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	3.60%	4.80%	1.20%	1.20%	Option 4	Duplication
Cultural and Related Services	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	3.60%	4.80%	1.20%	1.20%	Option 4	Duplication
Environmental and Regulatory Services	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	3.60%	4.80%	1.20%	1.20%	Option 4	Duplication
Planning and Development Services	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	3.60%	4.80%	1.20%	1.20%	Option 4	Duplication
Central Services	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	3.60%	4.80%	1.20%	1.20%	Option 4	Duplication
Housing Services (GFRA only)	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%			Option 5	Duplication
Cultural and Related Services	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%			Option 5	Duplication
Environmental and Regulatory Services	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%			Option 5	Duplication
Planning and Development Services	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%			Option 5	Duplication
Central Services	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%			Option 5	Duplication
Highways and Transport	1.00%	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%			Option 1	Agile unitaries, service integration and local interventions
Children's Social Care	1.00%	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%			Option 1	Agile unitaries, service integration and local interventions
Adult Social Care	1.00%	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%			Option 1	Agile unitaries, service integration and local interventions
Highways and Transport	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%			Option 2	Agile unitaries, service integration and local interventions

Children's Social Care	1.50%	1.00%	1.00%	1.00%	1.00%	1.00%	1.50%	1.00%			Option 2	Agile unitaries, service integration and local interventions
Adult Social Care	1.50%	1.00%	1.00%	1.00%	1.00%	1.00%	1.50%	1.00%			Option 2	Agile unitaries, service integration and local interventions
Highways and Transport	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%			Option 3	Agile unitaries, service integration and local interventions
Children's Social Care	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%			Option 3	Agile unitaries, service integration and local interventions
Adult Social Care	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%			Option 3	Agile unitaries, service integration and local interventions
Highways and Transport	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%			Option 4	Agile unitaries, service integration and local interventions
Children's Social Care	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.50%	1.00%			Option 4	Agile unitaries, service integration and local interventions
Adult Social Care	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.50%	1.00%			Option 4	Agile unitaries, service integration and local interventions
Highways and Transport	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%			Option 5	Agile unitaries, service integration and local interventions
Environmental and Regulatory Services	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%		Option 1	Joint working
Central Services	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%		Option 1	Joint working
Environmental and Regulatory Services	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%		Option 2	Joint working
Central Services	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%		Option 2	Joint working
Environmental and Regulatory Services	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%		Option 3	Joint working
Central Services	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%		Option 3	Joint working
Environmental and Regulatory Services	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%		Option 4	Joint working
Central Services	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%		Option 4	Joint working
Environmental and Regulatory Services	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%		Option 5	Joint working
Central Services	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%		Option 5	Joint working
Education	-1.00%	-0.80%	-0.80%	-0.80%	-0.80%	-0.80%	-0.60%	-0.80%			Option 1	Disaggregation disbenefits
Highways and Transport	-1.00%	-0.80%	-0.80%	-0.80%	-0.80%	-0.80%	-0.60%	-0.80%			Option 1	Disaggregation disbenefits
Children's Social Care	-1.00%	-0.80%	-0.80%	-0.80%	-0.80%	-0.80%	-0.60%	-0.80%			Option 1	Disaggregation disbenefits
Adult Social Care	-1.00%	-0.80%	-0.80%	-0.80%	-0.80%	-0.80%	-0.60%	-0.80%			Option 1	Disaggregation disbenefits
Central Services	-1.00%	-0.60%	-0.60%	-0.60%	-0.60%	-0.60%	-0.60%	-0.60%			Option 1	Disaggregation disbenefits
Education	-0.60%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.60%	-0.40%			Option 2	Disaggregation disbenefits
Highways and Transport	-0.60%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.60%	-0.40%			Option 2	Disaggregation disbenefits
Children's Social Care	-0.60%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.60%	-0.40%			Option 2	Disaggregation disbenefits
Adult Social Care	-0.60%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.60%	-0.40%			Option 2	Disaggregation disbenefits
Central Services	-0.60%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.60%	-0.40%			Option 2	Disaggregation disbenefits
Education	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%			Option 3	Disaggregation disbenefits

Highways and Transport	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%			Option 3	Disaggregation disbenefits
Children's Social Care	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%			Option 3	Disaggregation disbenefits
Adult Social Care	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%			Option 3	Disaggregation disbenefits
Central Services	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%			Option 3	Disaggregation disbenefits
Education	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.60%	-0.40%			Option 4	Disaggregation disbenefits
Highways and Transport	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.60%	-0.40%			Option 4	Disaggregation disbenefits
Children's Social Care	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.60%	-0.40%			Option 4	Disaggregation disbenefits
Adult Social Care	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.60%	-0.40%			Option 4	Disaggregation disbenefits
Central Services	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.40%	-0.60%	-0.40%			Option 4	Disaggregation disbenefits

The percentages above reflect full annualised benefits. Transformation benefits are modelled to accumulate to this full annualised effect from FY27/28 (assuming some *modest* early changes to senior management and joint working can be started prior to vesting day), through to full benefits realisation in each authority from FY34/35 onwards.

Note that based on FY24/25 RO returns, around half of Environmental and Regulatory Services expenditure is likely to relate to waste, recycling and street cleansing.

Member consolidation

Data from FY24/25, including basic and special responsibility allowances, is collected from each authority²⁶ (excluding outturns of travel and expenses which are assumed to remain constant).

A boundary review took place in Staffordshire County Council in 2024 which has created 62 wards, each with a single elected councillor across a relatively consistent electorate, providing a useful and common basis for councillor modelling.

In each option, two councillors per county electoral division are assumed in each authority as a starting point. Stoke-on-Trent City Council is the only unitary authority in the region, which currently has 44 councillors. Applying the same electorate to councillor ratio effectively reduces this to 33 in the Stoke-on-Trent area²⁷. Adjustments were made to this standard model in specific options to:

- Increase councillors by 12, from 18 to 30 (regarded as a minimum) for unitary A (Newcastle-under-Lyme) in option 1
- Assume options where Stoke-on-Trent geography is unchanged continue with the current 44 councillors and wards
- Assume that in option 4, the merged Newcastle-under-Lyme and Shropshire area would adopt the current electorate to councillor ratio in Shropshire. This recognises that Shropshire is not compelled to partake in LGR. This effectively increases councillors in the Newcastle-under-Lyme geography by 8, from 18 to 26, alongside the existing 71 in Shropshire

It is recognised that in all options, detailed boundary reviews may be required.

This generates:

- A total of 169 Members in option 1
- A total of 168 Members in option 2
- A total of 157 Members in option 3
- A total of 236 Members in option 4 (including Shropshire)
- A total of 168 Members in option 5

Proposed basic allowances are assumed using the costs of Staffordshire County Council, which was £10,827 in FY24/25. The exceptions to this are:

- Options where Stoke-on-Trent City geography is unchanged, assuming basic allowances continue as is (£12,000 in FY24/25)
- Option 4 where additional councillors in the merged Newcastle-under-Lyme and Shropshire geography are assumed to adopt the current Shropshire allowance (£12,891 in FY24/25)

Special Responsibility Allowances (SRA) for a 'typical' unitary is assumed at £250K for each proposed authority. This falls prudently between neighbouring unitary councils of Shropshire and Stoke-on-Trent had SRA outturns of £266K and £212K respectively in FY24/25. In options where Stoke-on-Trent City Council is unchanged, SRAs are also assumed to be unchanged.

Elections

Electoral costs are assumed constant in each option and based on Maximum Recoverable Amounts (MRA) from recent elections²⁸. Without more detailed proposals, it is assumed that LGR will present an opportunity for all-out elections and create savings in all options. Modelling assumes that:

- Town and parish council elections are out of scope
- Commissioner elections will be effectively replaced by MSA election requirements of similar costs (and that these costs are out of scope for LGR in any case)
- Current costs of Cannock Chase and Tamworth are adjusted to reflect two elections per 4-year cycle at 100% MRA and one election at 56% MRA, due to coincidence with Commissioner elections
- Elections in proposed unitaries will be whole council elections (with the same MRA as for current districts/boroughs). More detailed work to understand cost drivers is needed but it is currently assumed that this is likely to be staff and polling stations, which are conservatively assumed to remain relatively unchanged in each option
- Elections costs and savings are considered over a four-year cycle and converted to annual figures on an accruals basis

There could be further opportunity to align town/parish, local and mayoral elections for further public savings.

Senior leadership consolidation

Data from FY24/25 accounts is collected from each authority regarding senior leadership roles²⁵.

Current senior leadership of two-tier areas is disaggregated against the proposed geographies.

Similarly to the Members approach, an assumed senior leadership structure of a typical unitary authority is assumed for each unitary authority (adjusted for FTEs where shared leadership already exists, such as in Staffordshire Moorlands and High Peak). This is duplicated for each proposed authority, increased towards the current cost of whichever authority is considered most likely to be the continuing authority (to take a prudent approach to estimating the costs of new leadership structures). Forecast costs of new authorities are deducted from current disaggregated costs for each proposed authority area.

Part 3: implementation costs

Benchmarked values of costs (and benefits)²⁹ adjusted relating to number of existing authorities with multipliers applied for number of existing, number of proposed and complexity of disaggregation:

Cost group	Cost sub-group	Explanation
Transition	Shadow authorities	Cost associated with implementation and maintenance of shadow authorities will move in line with total number of proposed authorities. (Set up, Member basic allowances, additional cabinet, allowances and Head of Paid Service costs etc.)
Transition	Election to shadow authorities	

Transition	Programme delivery	Disaggregation of Staffordshire County Council up to three ways (possibly across district lines in some comparator options) Aggregation of lower tier services from 8 districts to up to four new unitaries (possibly across district lines in some options) Reaggregation of upper tier services, increasing upper tier service providers from two entities to up to four across Staffordshire and Stoke, meaning up to two instances where there is no continuing authority for upper tier services (i.e. upper tier services transferred into a new entity)
Transition	Redundancy and pension strain	Estimates highly circumstantial based on appropriate, fair and transparent process but likely to be lower with a greater number of total proposed authorities. Consolidation of officers, and senior officers in particular, is likely to be more significant where fewer unitaries are proposed (alongside increased recurring staff savings)
Transition	ICT consolidation	Options with greater number of proposed unitary authorities increases the <i>likelihood</i> that contracts can be exited and consolidated more quickly during disaggregation but presents additional implementation requirements for infrastructure and systems, particularly in services where less regional sharing is likely
Transition	Branding, communications and engagement	Cost associated with communications, public engagement and curation of new brands will move in line with total number of proposed authorities
Transition	Creation of new councils	Set up of sovereign new entities will move in line with total number of proposed authorities
Transition	Closedown of existing/shadow councils	Closedown of shadow entities will move in line with total number of proposed authorities
Transformation	Programme delivery	As per transition programme delivery section above
Transformation	Redundancy and pension strain	As per transition redundancy and pension strain section above
Transformation	ICT consolidation	As per transition ICT consolidation section above
All	Contingency	5% of total budget

Upper range value assumed for each option and allocated to each individual authority on the basis of *changing* population. This means that no costs are allocated to Stoke-on-Trent in options where the footprint is not changed, and the Newcastle-under-Lyme population is the relevant driver in option 4 for unitary A (i.e. the population of Shropshire is not relevant in attracting higher implementation costs given its position as outside the invite area for LGR).

Transformation costs are assumed to be incurred in phases across FY26/27 to FY28/29 inclusive, while transformation costs are assumed to be incurred in phases across FY28/29 to FY30/31.

Part 4: service harmonisation and performance analysis

The Staffordshire and Stoke-on-Trent region is comprised of:

- One county council (Staffordshire County Council)
- One unitary council (Stoke-on-Trent City Council)
- Eight district and borough councils (Newcastle-under-Lyme, Cannock Chase, East Staffordshire, Lichfield, South Staffordshire, Stafford, Staffordshire Moorlands, Tamworth)

In terms of service performance and harmonisation, this presents two categories of potential risk and opportunity related to creating shared policy, resource allocation, procedure and performance:

- Disaggregation, reaggregation and harmonisation of upper tier services (across areas of Staffordshire County Council and Stoke-on-Trent City Council)
- Aggregation and harmonisation of district/borough services (across the current eight district and borough councils), and integration with upper tier services. Note that disaggregation would also apply to any options that do not align with current district and borough footprints

The following sections break down the steps to service harmonisation and indicate the source data.

Current performance summary

Newcastle-under-Lyme's existing performance dashboard, comprising of publicly available and nationally comparable data provides as basis for performance analysis³⁰. Identification and collection of data to summarise position of each current authority:

- 19 performance metrics related to district/borough level services. These metrics are largely synonymous with service output and quality. E.g. Council tax collection broken down by collection status, NDR collection broken down by collection status
- Eight performance metrics and outcome areas largely synonymous with wider outcomes. E.g. Percentage of children who are obese, average attainment 8 score

Current expenditure summary

Analyse Revenue Outturn (RO)³¹ data (which is available for previous financial years and significantly more detailed than RA returns) to summarise expenditure against "mini groups" of related expenditure which primarily drive different performance metrics.

For example, the waste recycling and street cleansing mini group includes six individual RO line items:

1. Recycling
2. Street cleansing (not chargeable to highways)
3. Trade waste
4. Waste collection
5. Waste disposal
6. Waste minimisation

This grouping is constructed on the basis that in-house delivery or contractual arrangements for these services are often related, or comprised of service modules for which total scope of the mini group is most likely to align.

Mini groups are a mechanism to 'compare apples with apples'.

Expenditure normalisation

Calculate median expenditure per mini group at each authority in Staffordshire, alongside a national median. Adjust national median to compare authorities of different types. Example adjustments:

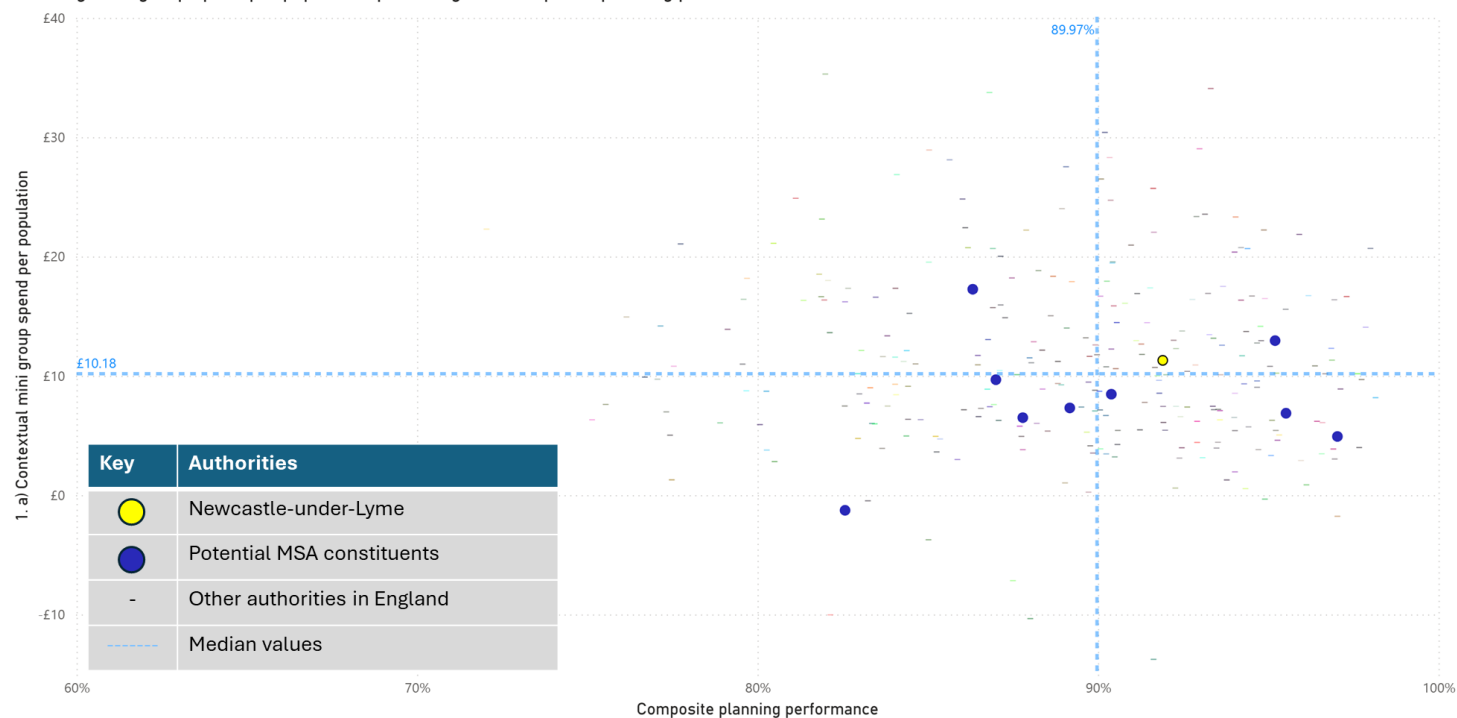
- Comparison of district/boroughs with unitary authorities of Stoke-on-Trent, Shropshire and Telford & Wrekin has been enabled by removing waste disposal, a mandatory upper tier service, from the waste, recycling and street cleansing mini group
- Mini groups might be compared gross or net of key grants inside and outside AEF

Current value for money summary

Visualise mini groups and performance data, as a basis to understand overall spending relative to national medians and performance. Visualisations (below) highlight current authorities within the *potential* MSA region against a national dataset configured by authority type (district, county, unitary, London borough, metropolitan borough).

Plot net expenditure per capita against performance in district level services – noting Cannock Chase are excluded from visualisations below having not completed financial returns in previous years.

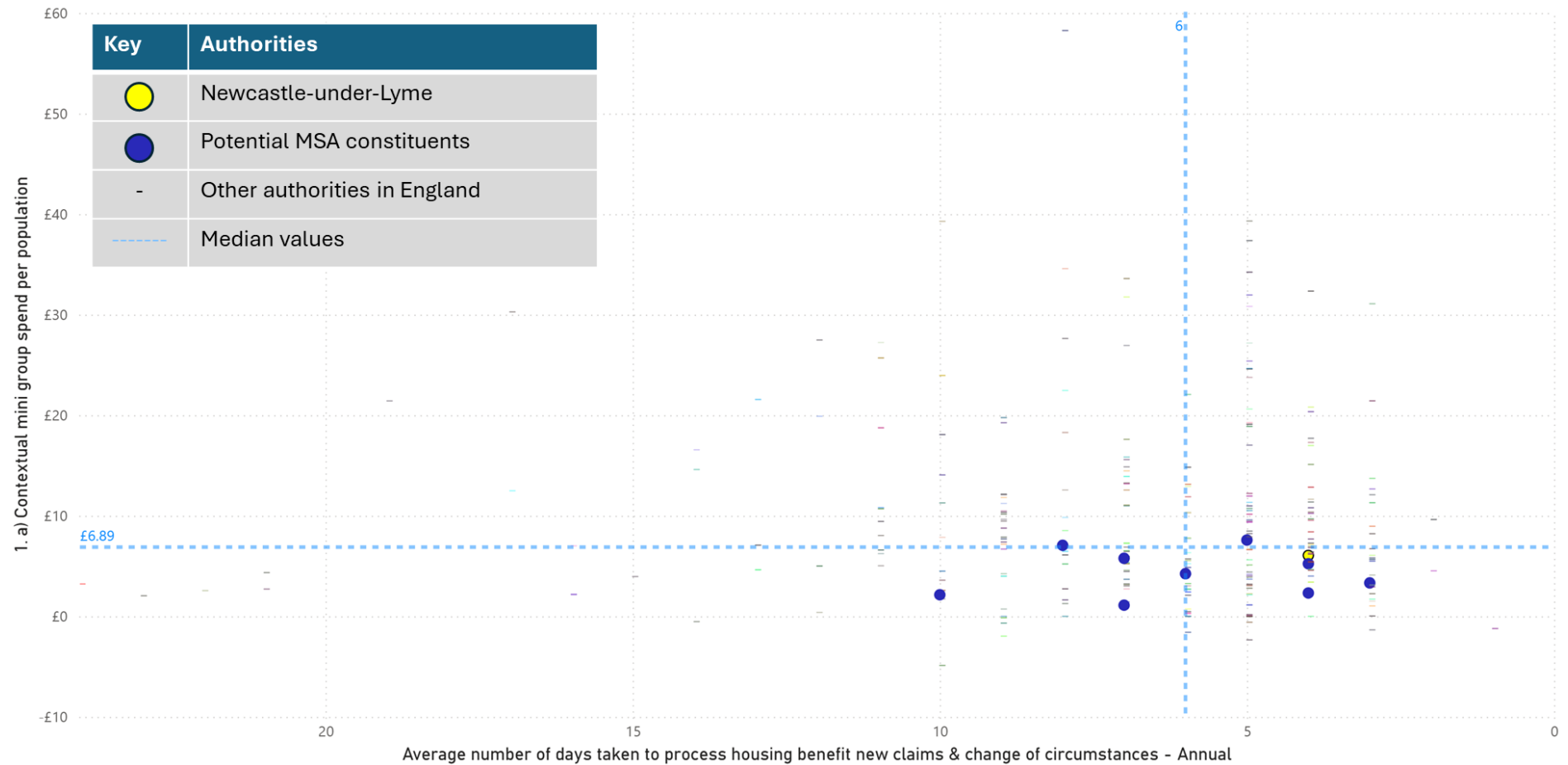
Planning mini-group spend per population plotted against composite planning performance



Planning mini group net expenditure per capita (across for shire district, unitary, metropolitan borough and London borough authorities) plotted against a *composite of planning performance (FY24/25)*. This comprises four weighted metrics, with the heaviest weighting applied to major applications on the basis that its influence on development is most prevalent in an LGR context:

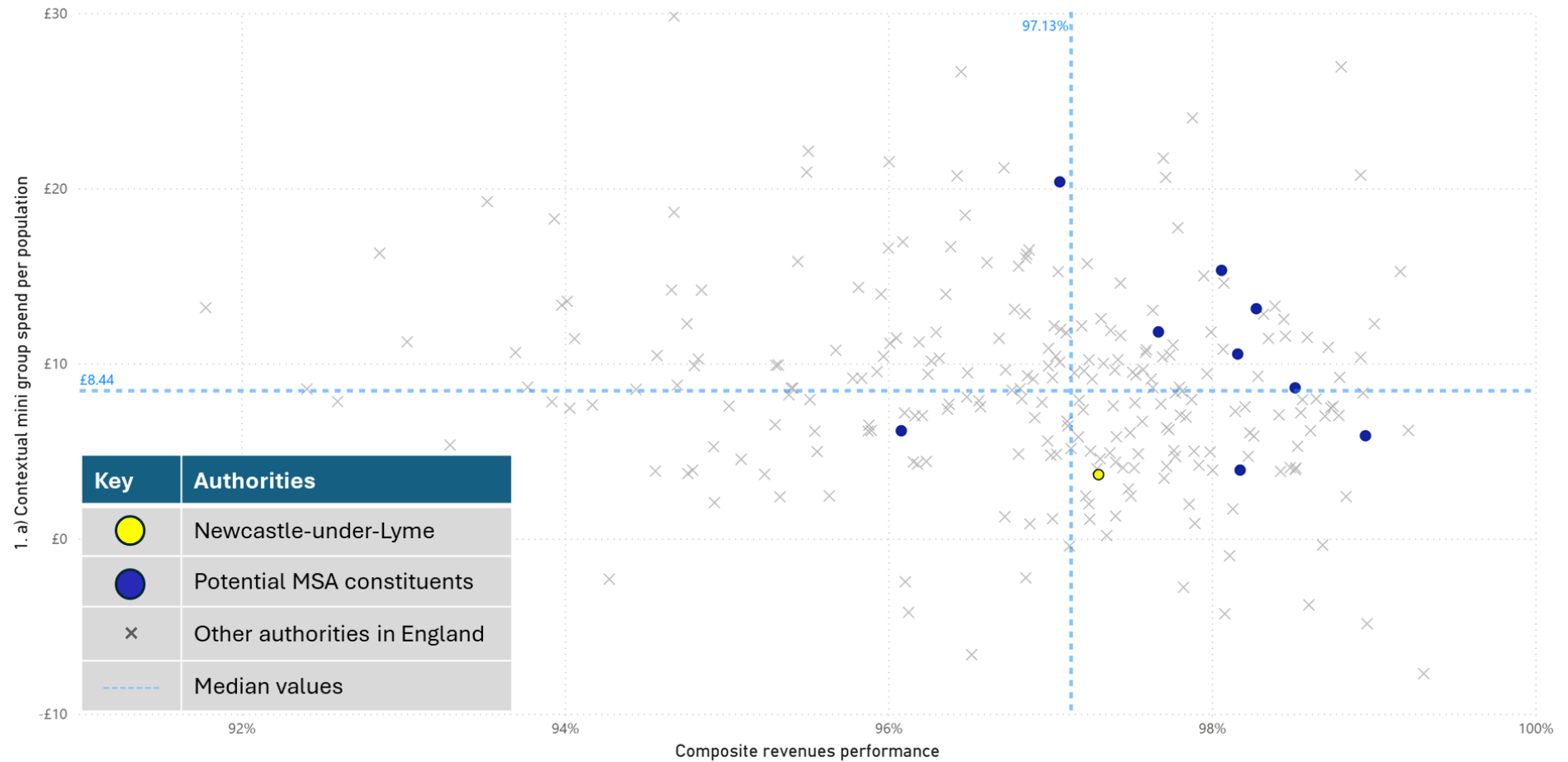
Metric	Composite metric weighting
% of major planning applications decided in time - Annual	0.50
% of minor planning applications decided in time - Annual	0.25
% of other planning applications decided in time - Annual	0.15
% of planning appeals dismissed - Annual	0.10

Housing benefits and welfare mini-group spend per population by average number of days taken to process housing benefit new claims & change of circumstances



Housing benefits and welfare mini group net expenditure per capita (across for shire district, unitary, metropolitan borough and London borough authorities) plotted against *time taken to process housing benefit new claims and change in circumstances – Annual (FY24/25)*

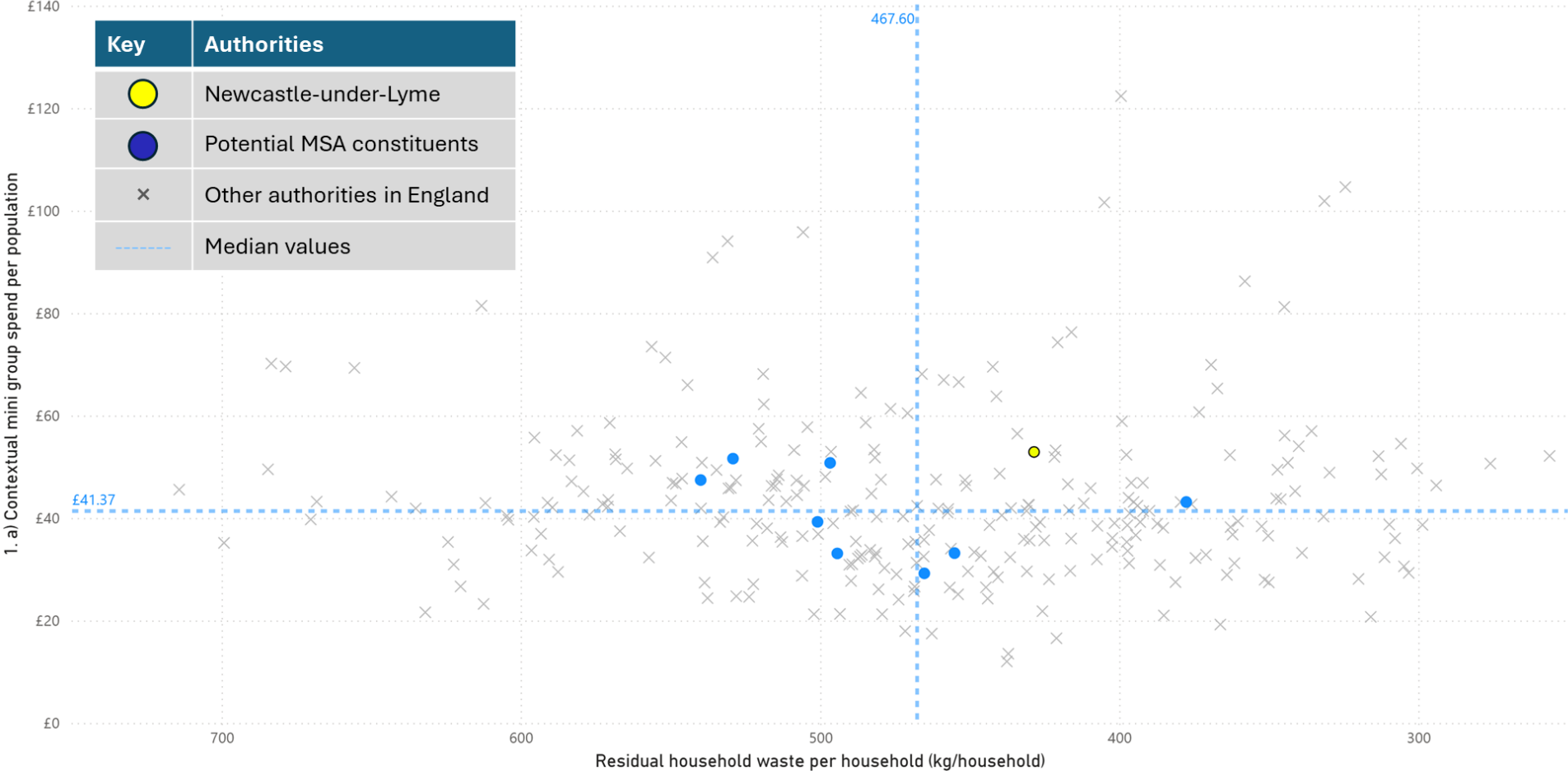
Revenues mini-group spend per population plotted against composite revenues performance



Revenues mini group net expenditure per capita (across for shire district, unitary, metropolitan borough and London borough authorities) plotted against a *composite of revenues performance (FY24/25)*. This comprises two weighted metrics:

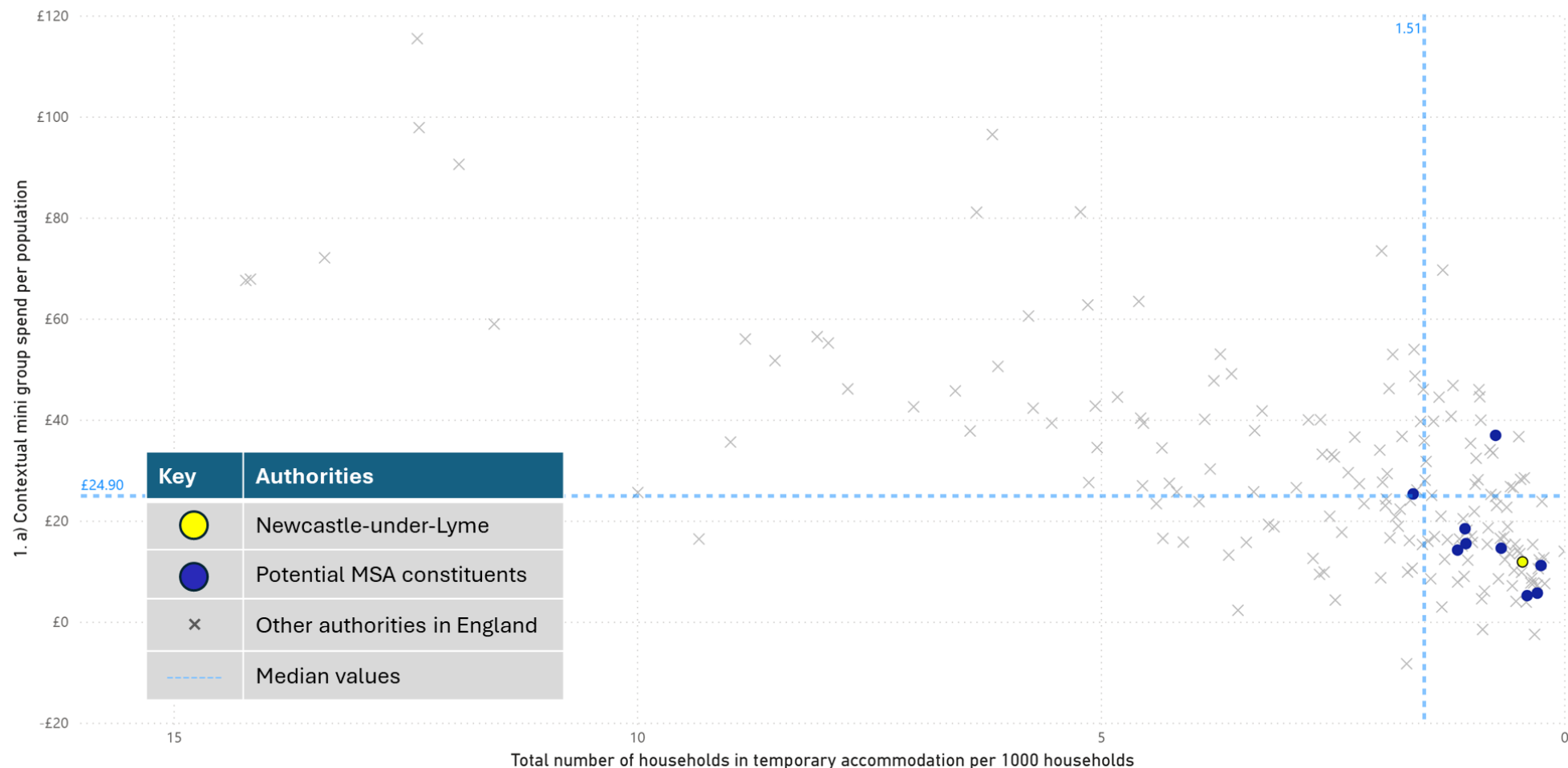
Metric	Composite metric weighting
Council tax collection broken down by collection status (%)	0.50
NDR collection broken down by collection status (%)	0.50

Waste, recycling and street cleansing mini-group spend per population plotted against residual household waste per household



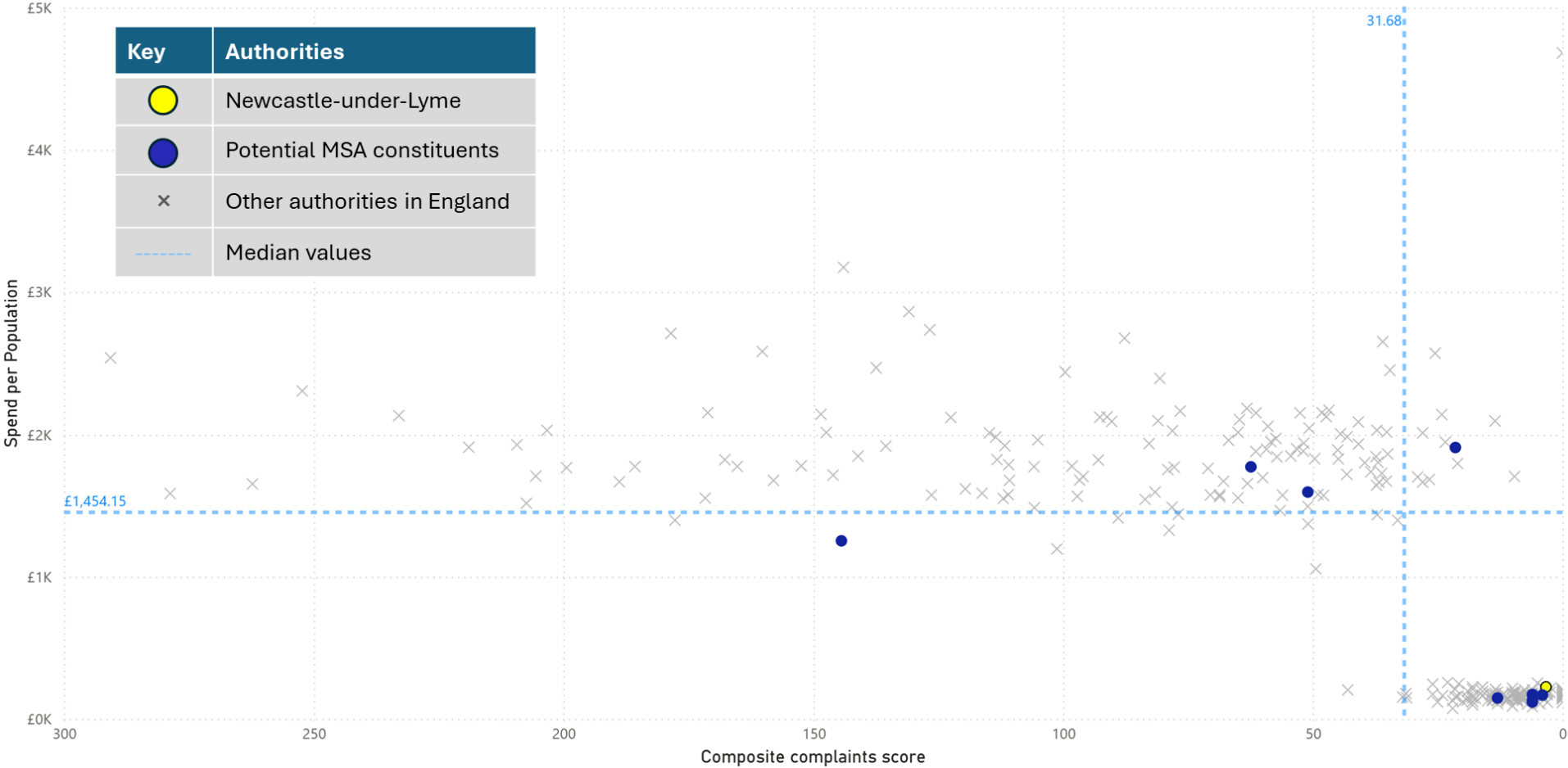
Waste, recycling and street cleansing mini group net expenditure per capita (across for shire district, unitary, metropolitan borough and London borough authorities) plotted against *residual household waste per household (kg/household) (FY23/24)*. Note that waste disposal costs are excluded to enable comparison of shire districts and unitary authorities.

Homelessness and options mini-group spend per population plotted against the total number of households in temporary accommodation per 1000 households



Homelessness and options mini group net expenditure per capita (across for shire district, unitary, metropolitan borough and authorities) plotted against *total number of households in temporary accommodation per 1,000 households (FY24/25)*. Note that London boroughs are excluded due to heavily skewing figures with high housing costs.

Total service expenditure per population plotted against composite complaints score



Total service expenditure per capita (across for shire district, shire county, unitary, metropolitan borough and authorities) plotted against *composite of complaints performance (FY24/25)* (calculated as the product of No. of Ombudsman complaints per 10,000 resident population, and Ombudsman complaints - uphold rate). There is a clear cluster of lower tier and upper tier authorities in terms of total service expenditure per population.

Mini group	Performance metric (district/borough tier)	Latest data	Newcastle-under-Lyme	Cannock Chase	East Staffordshire	Lichfield	South Staffordshire	Stafford	Staffordshire Moorlands	Tamworth	Stoke-on-Trent	Shropshire	Telford and Wrekin
Planning	% of major planning applications decided in time - Annual	2024-25	100%	100%	94%	83%	100%	93%	100%	100%	100%	86%	98%
Planning	% of minor planning applications decided in time - Annual	2024-25	94%	95%	88%	85%	98%	84%	89%	91%	93%	92%	99%
Planning	% of other planning applications decided in time - Annual	2024-25	96%	96%	90%	89%	99%	81%	93%	95%	97%	97%	99%
Planning	% of planning appeals dismissed - Annual	2024-25	40%	100%	67%	65%	59%	67%	42%	0%	92%	72%	69%
Planning	Planning composite performance	2024-25	92%	98%	89%	83%	95%	86%	90%	87%	97%	88%	96%
Housing benefits and welfare	Time taken to process housing benefit change in circumstances - Annual	2024-25	4	4	3	3	4	7	6	6	9	6	3
Housing benefits and welfare	Time taken to process housing benefit new claims - Annual	2024-25	18	31	15	15	18	31	11	16	31	29	14
Housing benefits and welfare	Time taken to process housing benefit new claims and change in circumstances - Annual	2024-25	4	6	4	3	5	8	6	7	10	7	4
Revenues	Council tax collection broken down by collection status (%)	2024-25	97.1%	97.1%	95.9%	98.3%	97.9%	97.8%	98.4%	97.7%	95.0%	97.7%	97.2%
Revenues	NDR collection broken down by collection status (%)	2024-25	97.5%	98.3%	98.2%	98.7%	98.3%	98.5%	99.5%	98.9%	97.1%	98.6%	98.1%
Revenues	Revenues composite performance	2024-25	97%	98%	97%	99%	98%	98%	99%	98%	96%	98%	98%
Waste, recycling and street cleansing	Percentage of household waste sent for reuse, recycling and composting	2023-24	46.1%	40.0%	42.3%	45.1%	45.6%	45.4%	54.5%	38.9%	37.0%	54.0%	49.2%
Waste, recycling and street cleansing	Residual household waste per household	2023-24	428.5	489.7	500.9	455.1	465.2	452.6	377.6	494.3	539.8	496.7	529
Homelessness and options	Vacant dwellings - all, as a percentage of all dwellings in the area	2023-24	2.9%	2.2%	2.9%	2.6%	2.4%	2.9%	3.3%	2.0%	3.5%	3.1%	2.8%
Homelessness and options	Total households on the housing waiting list as a percentage of total households	2023-24	4.6%	2.7%	13.5%	1.1%	2.0%	0.2%	1.9%	1.3%	1.8%	5.2%	#VALUE!
Homelessness and options	Number of households living in temporary accommodation per 1,000 households	2024-25	0.45	0.00	0.68	1.15	0.29	0.25	0.40	1.07	0.74	1.63	1.06
Homelessness and options	Housing delivery test	2023-24	139%	191%	197%	209%	210%	159%	124%	622%	91%	142%	327%
Economic development	Rate of births of new enterprises per 10,000 resident population aged 16 and above	2023-24	36.4	39.5	58.1	50.8	42.9	42.9	37	39.1	41.1	42.2	41.9
Recreation and sport	Percentage of adults aged 16+ who are active (150+ minutes a week)	2024-25	59%	60%	58%	67%	64%	65%	68%	60%	56%	68%	59%
Corporate	No. of Ombudsman complaints per 10,000 resident population	2024-25	0.8	1.5	0.6	0.8	0.5	0.4	1.4	0.4	3.0	2.6	1.7
Corporate	Ombudsman complaints - uphold rate	2024-25	33%	100%	50%	67%	100%	100%	100%	N/A	80%	60%	67%
Corporate	Complaints composite	2024-25	0.26	1.48	0.32	0.56	0.54	0.43	1.36	N/A	2.40	1.56	1.14

Baseline adjustment figures

It would be challenging to project how service harmonisation costs are likely to affect proposed authorities because they are influenced by a range of factors including:

- Differing demographics and nature of demand (including controllable and uncontrollable elements)
- Efficiency of current operations
- Strategic priorities of sovereign authorities
- Capital requirement to invest in enablers vs. requirement for ongoing revenue resources to deliver marginal performance gains

As a result, these potential costs are recognised as a risk to address during implementation and not quantified in financial models.

Overall MTFP model

Assemble every element from the sections above to produce a view of every proposed authority, for proposed and comparator options which:

- Starts with financial sustainability baseline covering each proposed authority for each financial year in each option
- Deducts apportioned transformation and reorganisation benefits/disbenefits for each proposed authority for each financial year in each proposed option
- Adds apportioned implementation costs phased for each proposed authority for each financial year in each proposed option
- Assesses the ability of each proposed authority to fund implementation by making an *assumption* that deficits and transformation costs are met in each financial year through usable reserves, while protecting an estimated minimum working balance. The modelling assumes that costs deficits arising each year are first met by the working balance, and then by repurposing earmarked reserves. Future surpluses are assumed to add to the working balance.
- In reality, future authorities will be faced with choices to meet deficits through:
 - Securing additional funding for change and transformation
 - Detailed conversations to disaggregate reserves differently and better align to authorities likely to experience these timing differences
 - Receipts from asset consolidation and disposal
 - Adopting a higher risk working balance position (at least temporarily)
 - Repurposing earmarked reserves temporarily or permanently
 - Temporary borrowing

The modelling does not take account of 'dynamic' factors including but not limited to:

- Mitigation of cost pressures through Officer and Member response
- Unknown political choices (e.g. council tax rates, service provision, capital borrowing, committed costs of existing plans)
- Cost pressures and overspends experienced since FY25/26 budgets have been set (which could be structural as well as in-year). This is particularly relevant regarding:

- Shropshire Council, which is predicting £50M overspend in the financial year as of 29th October 2025³²
 - Stoke-on-Trent City Council, which is predicting £13.7M overspend in the financial year as of 19th August 2025³³
- Actual housing delivery, business growth or economic shifts
- Service data (activity and output level) to more accurately assess and disaggregate current demands, existing delivery models, forecasts and transition arrangements (in transition and transformation phases)

Appendix 2: detailed financial modelling outcomes

Individual proposed unitaries are referred to with Unitary A, Unitary B, Unitary C and Unitary D labels in each option as follows:

Option 1	Existing authorities	Population
A	Newcastle-under-Lyme	127,727
B	Cannock Chase, South Staffordshire, Stafford	360,067
C	Staffordshire Moorlands, Stoke-on-Trent	367,076
D	East Staffordshire, Lichfield, Tamworth	322,708
Total		1,177,578

Option 2	Existing authorities	Population
A	Newcastle-under-Lyme, Staffordshire Moorlands	224,378
B	Cannock Chase, South Staffordshire, Stafford, East Staffordshire, Lichfield, Tamworth	682,775
C	Stoke-on-Trent	270,425
Total		1,177,578

Option 3	Existing authorities	Population
A	Newcastle-under-Lyme, Cannock Chase, South Staffordshire, Stafford	487,794
B	Staffordshire Moorlands, East Staffordshire, Lichfield, Tamworth, Stoke-on-Trent	689,784
Total		1,177,578

Option 4	Existing authorities	Population
A	Newcastle-under-Lyme, Shropshire	460,182
B	Stafford, East Staffordshire, Lichfield, Tamworth, Cannock Chase, South Staffordshire	682,775
C	Staffordshire Moorlands, Stoke-on-Trent	367,076
Total		1,510,033

Option 5	Existing authorities	Population
A	Newcastle-under-Lyme, Stoke-on-Trent, Staffordshire Moorlands	494,803
B	Stafford, East Staffordshire, Lichfield, Tamworth, Cannock Chase, South Staffordshire	682,775
Total		1,177,578

Financial sustainability baseline – all options

Option 1

Proposed unitary	Structural position at the beginning of the forecast period (occurring in either FY25/26 or FY26/27)		Structural position at the end of the forecast period (FY29/30)	
	(Deficit)/Surplus £M	Per capita	(Deficit)/Surplus £M	Per capita
A	(£6.3)	(£49)	£1.2	£10
B	£14.7	£41	£21.9	£59
C	(£15.8)	(£43)	£17.4	£48
D	(£4.2)	(£13)	£5.7	£17

Option 2

Proposed unitary	Structural position at the beginning of the forecast period (occurring in either FY25/26 or FY26/27)		Structural position at the end of the forecast period (FY29/30)	
	(Deficit)/Surplus £M	Per capita	(Deficit)/Surplus £M	Per capita
A	(£4.7)	(£21)	£9.4	£42
B	£10.4	£15	£20.7	£30
C	(£16.5)	(£61)	£11.5	£43

Option 3

Proposed unitary	Structural position at the beginning of the forecast period (occurring in either FY25/26 or FY26/27)		Structural position at the end of the forecast period (FY29/30)	
	(Deficit)/Surplus £M	Per capita	(Deficit)/Surplus £M	Per capita
A	£9.3	£19	£19.1	£38
B	(£20.0)	(£29)	£5.7	£8

Option 4

Proposed unitary	Structural position at the beginning of the forecast period (occurring in either FY25/26 or FY26/27)		Structural position at the end of the forecast period (FY29/30)	
	(Deficit)/Surplus £M	Per capita	(Deficit)/Surplus £M	Per capita
A	£27.5*	£60	£49.9	£106
B	£10.4	£15	£20.7	£30
C	(£15.8)	(£43)	£17.4	£48

*Note that base financial data has **not** been adjusted from RA budgets set at the start of FY25/26.

This is particularly relevant in unitary A for option 4, where the £50M forecast overspend at Shropshire is materially different to budget and could indicate a sustainability position that is significantly worse depending on how much of this overspend is considered 'structural'.

Option 5

Proposed unitary	Structural position at the beginning of the forecast period (occurring in either FY25/26 or FY26/27)		Structural position at the end of the forecast period (FY29/30)	
	(Deficit)/Surplus £M	Per capita	(Deficit)/Surplus £M	Per capita
A	£5.7	£6	£26.4	£29
B	(£16.5)	(£61)	£11.5	£43

Transformation benefits – all options

Total recurring annual benefits rising are stated for each option below. In each case, this figure is applicable to the whole Staffordshire and Stoke-on-Trent area. Realisation is phased, increasing year-on-year until full realisation in **FY35/36**.

The tables below summarise this position by adding the transformation benefits applicable to each proposed authority to the baseline position of that authority. The forecast period is extended to FY35/36 to account for the full period of benefits realisation.

Option 1

Maximum recurring annual benefit achieved by FY35/36: **£22.6M**

Proposed unitary	Structural position at the end of the forecast period after transformation (FY35/36)	
	(Deficit)/Surplus £M	Per capita
A	£0.8M	£7
B	£30.4M	£82
C	£23.1M	£64
D	£14.4M	£44

Option 2

Maximum recurring annual benefit achieved by FY35/36: **£27.0M**

Proposed unitary	Structural position at the end of the forecast period after transformation (FY35/36)	
	(Deficit)/Surplus £M	Per capita
A	£14.6	£65
B	£41.2	£59
C	£12.9	£48

Option 3

Maximum recurring annual benefit achieved by FY35/36: **£30.4M**

Proposed unitary	Structural position at the end of the forecast period after transformation (FY35/36)	
	(Deficit)/Surplus £M	Per capita
A	£31.5	£64
B	£23.6	£34

Option 4

Maximum recurring annual benefit achieved by FY35/36: **£31.1M**

Proposed unitary	Structural position at the end of the forecast period after transformation (FY35/36)	
	(Deficit)/Surplus £M	Per capita
A	£54.8*	£116
B	£41.2	£59
C	£23.1	£64

*Note that base financial data has **not** been adjusted from RA budgets set at the start of FY25/26.

This is particularly relevant in unitary A for option 4, where the £50M forecast overspend at Shropshire is materially different to budget and could indicate a sustainability position that is significantly worse depending on how much of this overspend is considered 'structural'.

Option 5

Maximum recurring annual benefit achieved by FY35/36: **£28.0M**

Proposed unitary	Structural position at the end of the forecast period after transformation (FY35/36)	
	(Deficit)/Surplus £M	Per capita
A	£53.1	£57
B	£12.9	£48

Implementation costs – all options

Cost group	Cost sub-group	Option 1		Option 2		Option 3		Option 4		Option 5	
		Lower range (£M)	Upper range (£M)	Lower range (£M)	Upper range (£M)	Lower range (£M)	Upper range (£M)	Lower range (£M)	Upper range (£M)	Lower range (£M)	Upper range (£M)
Transition	Shadow authorities	1.8	2.1	1.6	1.9	1.6	1.9	1.7	2.0	1.5	1.8
Transition	Election to shadow authorities	1.9	2.2	1.8	2.1	1.8	2.1	1.8	2.1	1.7	2.0
Transition	Programme delivery	9.4	11.0	5.1	6.0	5.1	6.0	6.9	8.1	3.7	4.4
Transition	Redundancy and pension strain	3.2	3.8	5.7	6.7	5.7	6.7	4.3	5.0	7.5	8.8
Transition	ICT consolidation	14.2	16.7	12.4	14.6	12.4	14.6	13.2	15.6	11.6	13.6
Transition	Branding, communications and engagement	1.5	1.7	0.7	0.8	0.7	0.8	1.0	1.2	0.5	0.6
Transition	Creation of new councils	2.2	2.6	1.5	1.8	1.5	1.8	1.8	2.1	1.2	1.4
Transition	Closedown of existing/shadow councils	1.0	1.2	1.0	1.2	1.0	1.2	1.0	1.2	1.0	1.2
Transformation	Programme delivery	8.0	9.4	7.5	8.8	7.5	8.8	7.7	9.1	7.2	8.5
Transformation	Redundancy and pension strain	4.6	5.4	7.5	8.8	7.5	8.8	5.9	6.9	9.5	11.2
Transformation	ICT consolidation	15.2	17.8	4.0	4.6	4.0	4.6	7.7	9.1	2.0	2.4
All	Contingency	3.1	3.7	2.4	2.9	2.4	2.9	2.7	3.1	2.4	2.8
Total one-off implementation costs		66.1	77.7	51.0	60.0	51.0	60.0	55.8	65.6	49.9	58.7

Appendix 3: background information on service delivery

Building control

Authority	Service model
Newcastle-under-Lyme	Partner in the North Staffordshire BC Partnership
Cannock Chase	Shared service with Stafford
East Staffordshire	Insourced
Lichfield	Host of the Central Building Control Partnership
South Staffordshire	Partner in the Central Building Control Partnership
Stafford	Shared service with Cannock Chase
Staffordshire Moorlands	Partner in the Derbyshire Building Control Partnership
Tamworth	Partner in the Central Building Control Partnership
Staffordshire	N/A
Stoke-on-Trent	Host of the North Staffordshire BC Partnership
Shropshire	Insourced
Telford and Wrekin	Insourced

Waste, recycling and streetscene

Waste and recycling

Authority	Service model
Newcastle-under-Lyme	Insourced
Cannock Chase	Outsourced with Biffa R&W until 2035
East Staffordshire	Insourced
Lichfield	Shared service with Tamworth
South Staffordshire	Outsourced with Biffa R&W until 2035
Stafford	Outsourced with Veolia R&W until 2038 (break clause 2028)
Staffordshire Moorlands	Shared service with Cheshire East
Tamworth	Shared service with Lichfield
Staffordshire	N/A
Stoke-on-Trent	Insourced
Shropshire	Outsourced with Veolia R&W until 2035
Telford and Wrekin	Outsourced with Veolia R&W until 2035

Streetscene

Authority	Service model
Newcastle-under-Lyme	Insourced
Cannock Chase	Shared service with Stafford
East Staffordshire	Insourced
Lichfield	Insourced
South Staffordshire	Insourced
Stafford	Shared service with Cannock Chase
Staffordshire Moorlands	Insourced
Tamworth	Insourced
Staffordshire	N/A
Stoke-on-Trent	Insourced
Shropshire	Outsourced with Veolia R&W until 2035
Telford and Wrekin	Outsourced with Veolia R&W until 2035

Commercial shared services

Authority	Service model
Newcastle-under-Lyme	Insourced
Cannock Chase	Shared with Stafford
East Staffordshire	Not enough info
Lichfield	Outsourced Lichfield West Mids Traded services. Shares with other councils including Tamworth
South Staffordshire	Business place partnership
Stafford	Shared with Cannock Chase
Staffordshire Moorlands	Shared with High Peak Borough and Joint procurement with Stoke on Trent
Tamworth	Shared service with Litchfield
Staffordshire	Insourced but collaborates with other councils
Stoke-on-Trent	Insourced - Joint procurement with Stoke on Trent
Shropshire	Mixed model with both insourced and outsourced
Telford and Wrekin	Insourced

Finance

Authority	Service model
Newcastle-under-Lyme	Insourced
Cannock Chase	Shared service with Stafford Borough
East Staffordshire	Insourced
Lichfield	Insourced
South Staffordshire	Insourced
Stafford	Shared service with Cannock Chase
Staffordshire Moorlands	Shared service with High Peak Borough
Tamworth	Insourced
Staffordshire	Insourced
Stoke-on-Trent	Insourced
Shropshire	Insourced
Telford and Wrekin	Insourced

Information and technology

Authority	Service model
Newcastle-under-Lyme	Insourced
Cannock Chase	Shared service with Stafford
East Staffordshire	Outsourced
Lichfield	Insourced
South Staffordshire	Mixed with some outsourced
Stafford	Shared service with Cannock Chase
Staffordshire Moorlands	Insourced
Tamworth	Insourced
Staffordshire	Insourced
Stoke-on-Trent	Outsourced
Shropshire	Mixed with some outsourced

Telford and Wrekin	Insourced
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Joint working – Operational services

Authority	Service model
Newcastle-under-Lyme	Insourced
Cannock Chase	Insourced
East Staffordshire	Outsourced (exploring insourced)
Lichfield	Insourced
South Staffordshire	Insourced
Stafford	Insourced
Staffordshire Moorlands	Insourced
Tamworth	Insourced
Staffordshire	Primarily insourced with legacy outsourcing
Stoke-on-Trent	Insourced
Shropshire	Insourced with collaboration with Oswestry Town council
Telford and Wrekin	Mixed with some outsourced

Planning services

Authority	Service model
Newcastle-under-Lyme	Insourced
Cannock Chase	Shared with Stafford Borough
East Staffordshire	
Lichfield	Insourced
South Staffordshire	
Stafford	Shared with Cannock Chase
Staffordshire Moorlands	
Tamworth	
Staffordshire	
Stoke-on-Trent	
Shropshire	
Telford and Wrekin	

Neighbourhood delivery services

Authority	Service model
Newcastle-under-Lyme	Insourced
Cannock Chase	Mixed insourced and outsourced
East Staffordshire	Insourced
Lichfield	Insourced
South Staffordshire	Insourced
Stafford	Insourced
Staffordshire Moorlands	Insourced
Tamworth	Insourced
Staffordshire	Mixed insourced and outsourced
Stoke-on-Trent	Insourced

Shropshire	Insourced
Telford and Wrekin	Insourced

Regulatory services

Authority	Service model
Newcastle-under-Lyme	Insourced
Cannock Chase	Shared with Stafford
East Staffordshire	Insourced
Lichfield	Insourced
South Staffordshire	insourced
Stafford	Shared with Cannock Chase
Staffordshire Moorlands	Insourced
Tamworth	Insourced
Staffordshire	Mixed insource and outsource (procurement and pensions)
Stoke-on-Trent	Insourced
Shropshire	Insourced
Telford and Wrekin	Insourced

Shared service options for SPP

Authority	Service model
Newcastle-under-Lyme	Insourced
Cannock Chase	Shared with Stafford
East Staffordshire	Under review, currently insourced
Lichfield	Insourced shared with Tamworth
South Staffordshire	Insourced
Stafford	Shared with Cannock Chase
Staffordshire Moorlands	Strategic alliance with High Peak
Tamworth	Shared with Litchfield
Staffordshire	Mixed insource and outsource
Stoke-on-Trent	
Shropshire	Insourced
Telford and Wrekin	Insourced

Appendix 4: detailed engagement outputs and analysis

Summary from County led, joint sessions with organisational stakeholders

Transcripts provided by Staffordshire County Council have been analysed and the following summary concluded by the Council.

22 bodies engaged with a variety of officers from across Staffordshire County Council, Stoke County Council and Staffordshire district and borough councils. Organisational stakeholders were engaged representing the voluntary sector (4), health (3), emergency services (3), education (4), business (3), and MP's (5).

Conversations were structured around 5 themes:

- Provision of services
- Opportunities and challenges
- Community links
- Efficiency
- Partnership working.

The focus was on current working relationships between bodies and local authorities and how LGR may impact organisations positively and negatively broadly, rather than discussing the specific options being explored.

Awareness and knowledge of LGR varied across the stakeholders as did recognition of the links between Council's and other organisations. Some bodies took the opportunity to question current working practices e.g. across emergency services.

The topic of Devolution and Strategic Authorities was only touched upon by a few interviewees and of those that did comment, they raised concerns about the role of Strategic Authorities, the devolution of powers and resources, and the impacts on organisations. Concerns were also raised at the loss of partnership arrangements and good working relationships that have developed and exist currently.

Output from Newcastle-under-Lyme led focused engagement with organisational stakeholders

Approach

Newcastle-under-Lyme Borough Council approached a range of stakeholders across the education, health, emergency services, voluntary, housing and local business sectors to gather feedback on a proposal to form a single unitary council for the borough. Engagement sessions were held with 9 organisations as listed below.

Sector	Organisation	Stakeholders engaged
Education	Keele University	Kevin Shakesheff, Vice Chancellor
	Newcastle and Stafford College Group	Craig Hodgson, Principal & Chief Executive

	Staffordshire University	Professor Martin Jones, Vice Chancellor & Chief Executive
Emergency Services	Staffordshire Police	Chief Superintendent Emily Clarke & Chief Inspector Scott Gidman
	Staffordshire Fire & Rescue Service	Rob Barber, Chief Fire Officer & Glynn Luzynj, Fire Officer
	Staffordshire Police, Fire & Crime Commissioner	Ben Adams, Staffordshire Police, Fire and Crime Commissioner & Louise Clayton, Chief Executive
Housing	Aspire Housing	Sinead Butters, Chief Executive
Local businesses	Business Improvement District	Charlotte Pearce, BID Manager & Nigel Davies, local business owner and BID Co-Chair
Voluntary sector	Support Staffordshire	Garry Jones, Chief Executive

Participants were asked three key questions:

- **Q1:** What do you see as the inherent strengths or opportunities around this option?
- **Q2:** What risks do you see?
- **Q3:** If this change does take place, what considerations need to be made for your organisation? What will be impacted? And how might we mitigate and support that transition?

Outputs from each engagement session were produced and shared with stakeholders to ensure an accurate representation of the discussions. Summaries for each sector are produced below.

Education sector summary

The education sector (including Keele University, the University of Staffordshire and the North Staffordshire College Group - NSCG) broadly supports the principle of strengthening local identity and education pipelines in Newcastle-under-Lyme, but is united in its concern that the proposed single unitary may be too small to deliver strategic functions effectively. There is a strong call for implementation of a Strategic Authority model, robust cross-boundary partnerships, and careful attention to the risks of fragmentation and missed opportunities for investment and innovation. The sector recommends further data gathering and ongoing dialogue as the proposal develops.

Opportunities identified	Risks and concerns	Implementation considerations
• Strengthening local education pipelines: The proposal could formalise and strengthen progression routes from local schools and colleges to higher education, especially	• Scale and strategic capacity: All three organisations express concern that the proposed unitary footprint is too small to deliver strategic functions effectively.	• Strategic authority needed: The education sector strongly advocates for a strategic authority model, with locality delivery hubs to ensure service needs are met and government investment is not missed.

benefiting local students and supporting civic relationships between universities and the borough. • Civic collaboration: There is potential for enhanced collaboration between universities and local government, aligning with government policy encouraging university partnerships and place-based initiatives. • Local pride and aspirations: If implemented well, the change could foster local pride and positively influence educational aspirations, particularly in areas of deprivation.	There is a risk of fragmentation, reduced capacity, and diminished influence compared to larger regional structures. This could impact funding, innovation, and the ability to address broader economic and social challenges. • Cross-boundary coordination: Universities and colleges operate across multiple local authorities. Further fragmentation would complicate administration, especially for services like Education, Health and Care Plans (EHCPs), and could hinder effective service delivery. • Risk of being left behind: There is concern that Newcastle-under-Lyme could be disadvantaged compared to neighbouring areas, particularly if government investment favours larger, strategic authorities. • Student progression and course viability: Smaller footprints may constrain education and skills planning, potentially leading to 'cold spots' where courses are discontinued due to low application numbers, even if there is latent demand.	• Maintaining partnerships: Cross-boundary partnerships and place-branding vehicles (e.g., 'We Are Staffordshire') should be maintained to market the area and cut across local politics. • Responsive service delivery: While streamlining duplicated frontline services is desirable, responsiveness to residents' everyday experiences must be retained. • Data and evidence: Stakeholders recommend gathering robust data on student progression from local schools and colleges to support the case for reorganisation.
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Divergent views from this stakeholder group:

- **Staffordshire University** sees limited direct impact on its recruitment or relationships, focusing instead on the broader education pipeline and local pride.

- **NSCG** is more critical, seeing no real opportunities in the proposal as currently framed and cautioning of potential operational and financial challenges due to the small area.
- **Keele University** is open to collaboration but stresses that strategic functions require a footprint larger than a single district, and that having new unitaries for Newcastle and Stoke-on-Trent is not practical given their integration.

Emergency services summary

The emergency services sector (including Staffordshire Police, Staffordshire Fire and Rescue Service, and the Staffordshire Police, Fire and Crime Commissioner's Office) recognise the value of local identity and the potential for more responsive, community-focused service delivery under the proposed single unitary model for Newcastle-under-Lyme. However, there are significant concerns about increased complexity and resource requirements, risks of fragmentation, and the potential for reduced efficiency and consistency in safeguarding, emergency response, and partnership working. The sector stresses the importance of clear governance, robust cross-boundary collaboration, and careful planning to avoid duplication, confusion, and gaps in service delivery.

Opportunities identified	Risks and concerns	Implementation considerations
• Local responsiveness: Local needs and issues will be better understood and addressed, with residents' voices more likely to be heard and local ownership strengthened. • Effective partnership working: Smaller, more locally focused authorities could enable more effective partnership working, allowing emergency services to connect closely with local councillors and agencies to deliver on community priorities. • Simplified accountability: Simplifying council responsibilities and aligning local policing teams with council boundaries can reduce barriers to delivery, making accountability clearer and potentially	• Resource stretch and duplication: Managing multiple authorities and meetings risks stretching resources, creating duplication, and increasing silos, which could lead to missed opportunities and greater risk for vulnerable people. • Fragmentation and inconsistency: Fragmentation of services could result in inconsistent approaches to regulation, safety, and safeguarding, with the potential for weakened cross-sector working, especially with health partners. • Complexity and accountability loss: Increased complexity, more policies, and additional statutory boards could dilute accountability, confuse residents, and risk a postcode lottery in	• Clear communication: Clear, proactive communication with communities is essential, especially regarding council tax implications and changes to service delivery. • Strategic collaboration: A strategic, joined-up approach is needed to avoid duplication and ensure no gaps in emergency services, with a focus on building trust and maintaining effective relationships with stakeholders. • Balanced governance: The transition should balance local influence with consistency, ensuring equitable services across Staffordshire and considering which functions can be managed collectively versus at the unitary level.

improving service planning and responsiveness.	service delivery, particularly in safeguarding and community safety.	
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Divergent views from this stakeholder group:

- **Policing perspective:** Staffordshire Police sees minimal change for Newcastle and benefits in reducing barriers to delivery, but warns of increased complexity and management challenges with more authorities. The difference in policing resources needed for areas such as Newcastle and Staffordshire Moorlands, and that for the city, was strongly noted.
- **Fire and PFCC perspective:** Staffordshire Fire and Rescue Service and the Police, Fire and Crime Commissioner's Office value local identity and empowerment, but are concerned about fragmentation, duplication, and loss of influence or strategic capacity.
- **Balance of local and county-wide needs:** While all agree that challenges are not insurmountable with careful planning and governance, there are differing views on the balance between local responsiveness and the need for consistent, county-wide approaches.

Housing summary

Aspire Housing values its established partnership with the borough council, which has supported improvements to housing stock and new developments. Stakeholders could see benefits of maintaining a locally focused authority for Newcastle-under-Lyme, highlighting how greater delegation of responsibilities and resources could enable more tailored housing services and stronger community impact. However, they raised concerns about potential gaps in experience if the council transitions to unitary status, and warned that a smaller footprint may miss strategic opportunities available at a larger scale, such as improved efficiencies, stronger influence with central government, and access to wider housing grant funding. They stressed the need for clear communication, workshops to clarify service delivery, and open dialogue to manage financial and operational impacts during any transition.

Opportunities identified	Risks and concerns	Implementation considerations
• Tailored local services: Greater delegation of responsibilities, budgets, and resources could allow Aspire to deliver more tailored services that directly meet residents' needs, which is harder to achieve across a larger geography. • Enhanced responsiveness: Enhanced responsiveness to local needs could result in	• Capacity and experience gaps: The council has not previously delivered unitary services, raising concerns about potential gaps in knowledge, skills, and resources needed for effective delivery. • Missed strategic opportunities: There is a risk of missing broader geographic efficiencies and strategic opportunities that could be realised by working at a larger scale, such as	• Ongoing communication: Maintain regular communication through newsletters and bulletins to keep stakeholders informed on progress and changes. • Clarity on service delivery: Host workshops to clarify how housing services will be delivered, including which initiatives may be de-prioritised or withdrawn.

more meaningful impact within communities, building on strong existing partnerships with Newcastle-under-Lyme Borough Council. • Proven local collaboration: The proposal builds upon a proven track record of successful collaboration with the council, supporting residents with additional housing benefit services and funding for improving poor housing stock and developing new homes.	improved service quality and resource allocation. • Misalignment with devolution ambitions: Newcastle-under-Lyme as a standalone unitary does not align with broader devolution ambitions or the current strategic direction, potentially reducing influence with central government and missing out on joined-up approaches.	• Strategic and financial planning: Consider both financial and strategic impacts, as well as operational aspects such as grant allocation, ensuring open dialogue as plans evolve.
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Local businesses summary

The Newcastle Business Improvement District (BID), represented local business who strongly favour retaining the current governance structure, citing the value of direct access to council services and long-standing relationships that support effective advocacy and regeneration. They fear that a larger authority could dilute Newcastle's identity, introduce bureaucracy, and reduce responsiveness, potentially undermining recent successes in funding and town centre improvements. While businesses see no clear advantages in local government reorganisation, if change is unavoidable, they prefer a unitary authority based on the existing footprint to maintain continuity.

Opportunities identified	Risks and concerns	Implementation considerations
No opportunities identified, preference for no change due to: • Preservation of local accountability: The current system provides direct access to council services and strong local accountability, which businesses value and wish to preserve. • Continuity of relationships: Strong relationships and effective communication with the current council have taken years to build, and maintaining these is seen as essential for the BID's ability to	• Loss of local identity: There is a significant risk of losing Newcastle's strong local identity and established contacts, which could reduce the effectiveness of business advocacy and support. • Increased bureaucracy: A larger authority could introduce more bureaucracy, making it harder to get things done quickly and reducing joined-up thinking and responsiveness. • Threat to recent successes: Businesses fear that successful recent funding and	• Transparent communication: There is a strong need for transparency and clear communication with businesses and residents about any changes, to avoid misinformation and confusion. • Coordination with BID: The BID and council should coordinate closely to keep businesses informed and ensure continuity in support and services. • Recognition of local position: Strong local opposition to LGR is noted, including a petition with over 9,000

advocate for local businesses. • Minimising change and impact: If LGR is imposed, businesses prefer the council's proposal for a unitary authority on the existing footprint to maintain continuity and avoid disruption.	regeneration projects may not continue under a larger authority, and are concerned about who would bear the costs of reorganisation.	signatures against the changes, highlighting the importance of listening to community sentiment.
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Voluntary sector summary

Support Staffordshire supports communities, individuals and organisations to work in collaboration to bring about positive change in their community by actively encouraging Social Action. They felt that the strength of the proposal is that a Newcastle-under-Lyme unitary will remain the most local and engaged with its communities. However, they raised a risk that within the strategic authority area it would be the smallest partner and could be dwarfed by its near neighbours in both Stoke and Stafford, which may severely impact investment and voice. They are keen to understand what cross-unitary partnerships might be explored in order to ensure a strong north Staffordshire approach.

Considerations for transition planning

The following considerations should be maintained for a smooth transition to a new organisation.

- **Clear communication:** maintain transparent, proactive communication with all stakeholders, including regular updates and open dialogue about changes, impacts, and progress.
- **Strategic collaboration:** establish robust cross-boundary partnerships and governance structures to ensure joined-up service delivery and avoid duplication or gaps.
- **Service delivery clarity:** host workshops and provide guidance to clarify how services will be delivered, which initiatives may change, and how responsibilities will be delegated.
- **Data and evidence:** gather and use robust data to inform decisions, especially regarding service needs and impacts.
- **Financial and operational planning:** carefully consider financial, strategic, and operational impacts, including resource allocation and grant funding.
- **Community engagement:** ensure responsiveness to local needs and maintain strong relationships with community groups, businesses, and voluntary organisations.
- **Balanced governance:** balance local influence with consistency across the wider region, ensuring equitable services and accountability.

Analysis and themes from County Council-led resident focus groups

Transcripts provided by Staffordshire County Council have been analysed and the following themes and summary concluded by the Council.

Summary of engagement

The County Council arranged its own focus group made up of Newcastle-under-Lyme residents discussed general views around reorganisation and expressed concerns about the decline of town centres, the impact of council restructuring (such as moving toward unitary authorities), and the

importance of maintaining local accountability, quality of services, and community engagement. The group also debated the pros and cons of having one versus multiple councils, highlighting issues like funding, local relevance, and the risk of losing local knowledge.

Key themes from the session

1. Local Identity and Community Attachment

Participants expressed mixed feelings about their attachment to Newcastle-under-Lyme and Staffordshire, noting a decline in community spirit and local identity over time. While some described pockets of strong community (e.g., street parties, local events), others felt that generational changes and increased mobility have weakened traditional bonds.

2. Economic and Social Change

There was a strong sense of loss regarding the area's industrial past (pits, steelworks) and frustration over perceived economic stagnation. Longer-term decline in town centres, proliferation of warehousing and lower-quality jobs, and the impact of business rates and empty units were highlighted as ongoing challenges.

3. Council Structure and Local Governance

The group discussed the complexity of local government, with many participants unsure about the roles and responsibilities of different councils. There was scepticism about the effectiveness of councils, but some positive feedback on parks, libraries, and recycling services. The debate over moving to unitary authorities versus retaining multiple councils centred on concerns about losing local focus, accountability, and relevance to distinct communities.

4. Access, Accountability, and Engagement

Access to services, transparency, and accountability were repeatedly identified as top priorities. Participants wanted clearer communication from councils, easier access to help (such as local hubs or apps), and more opportunities for democratic input and oversight. Disengagement and lack of awareness about council functions were seen as barriers to effective local governance.

5. Transport, Infrastructure, and Public Services

Issues with parking, transport integration, and infrastructure were discussed, with comparisons to other cities like Manchester. Participants noted inequalities in service provision and the challenges of delivering efficient public transport in less densely populated areas.

6. Funding, Council Tax, and Value for Money

Concerns were raised about council tax disparities, funding models, and the sustainability of services. The risk of "levelling down" if merged with areas facing financial difficulties (like Stoke) was a recurring worry. Value for money was seen as an expectation rather than a priority, with participants emphasizing the need for fair and effective resource allocation.

7. Future of Local Government

The session concluded with reflections on the pros and cons of restructuring local government, the importance of maintaining local hubs, and the need for councils to remain relevant and responsive to

community needs. Participants stressed that engagement and communication are essential for any future changes to succeed.

Analysis of Newcastle-under-Lyme issued online consultation

The following report was produced by Strategic Hub, Newcastle-under-Lyme Borough Council, in September 2025.



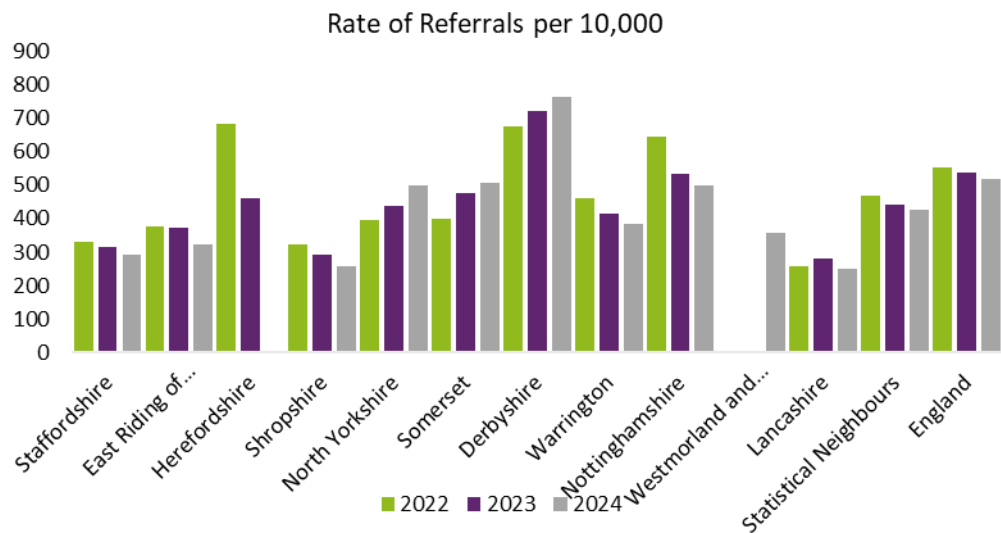
Appendix 4 NuL
Survey ANalysis.pdf

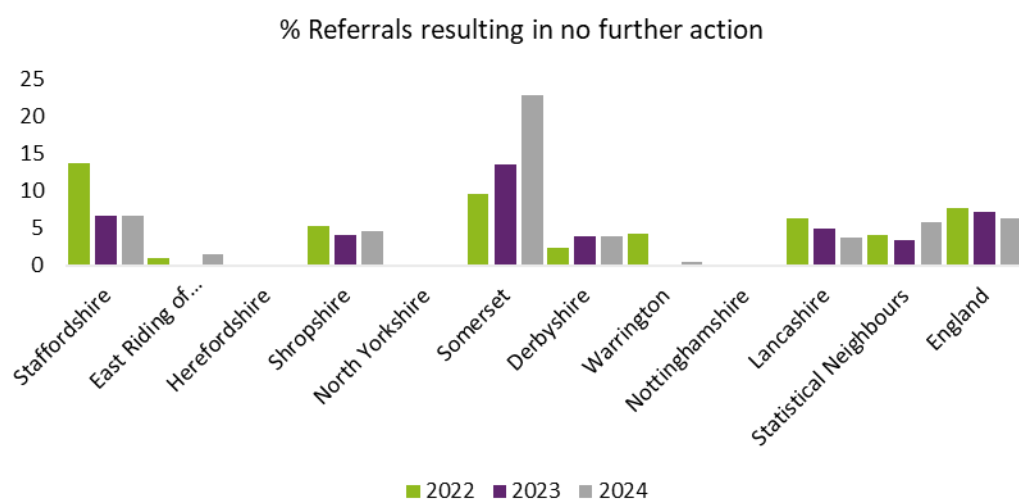
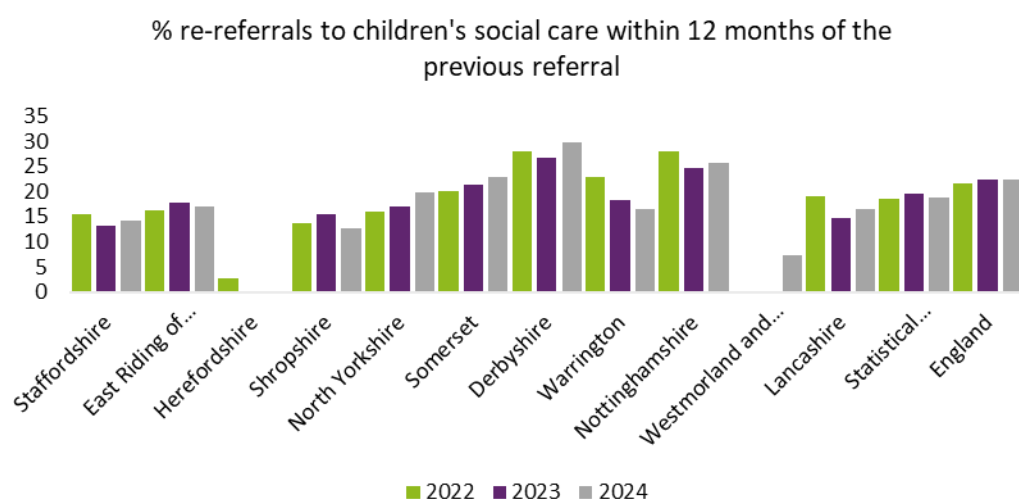
Appendix 5: education, children’s social care and adult social care analysis

Children’s social care

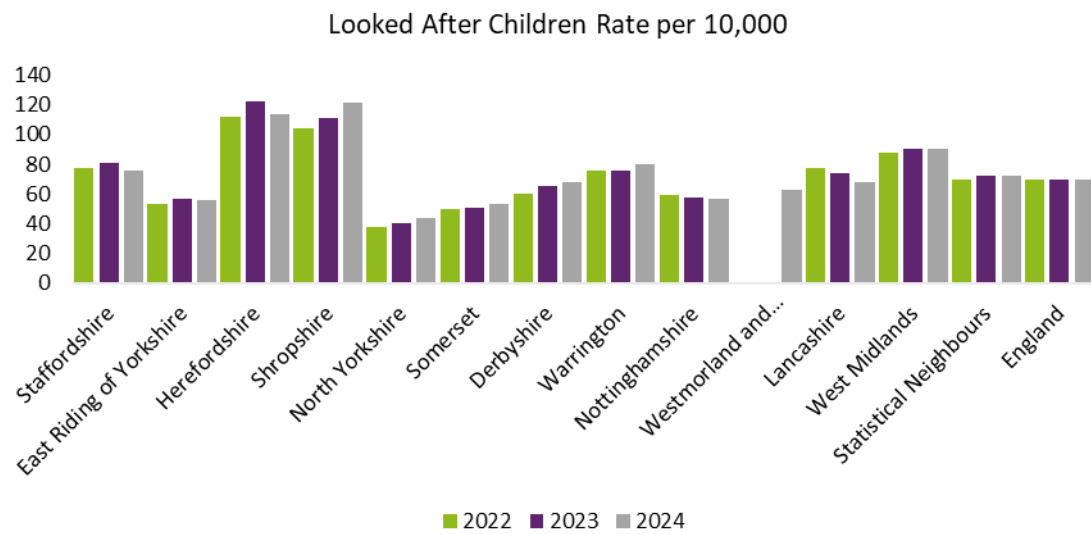
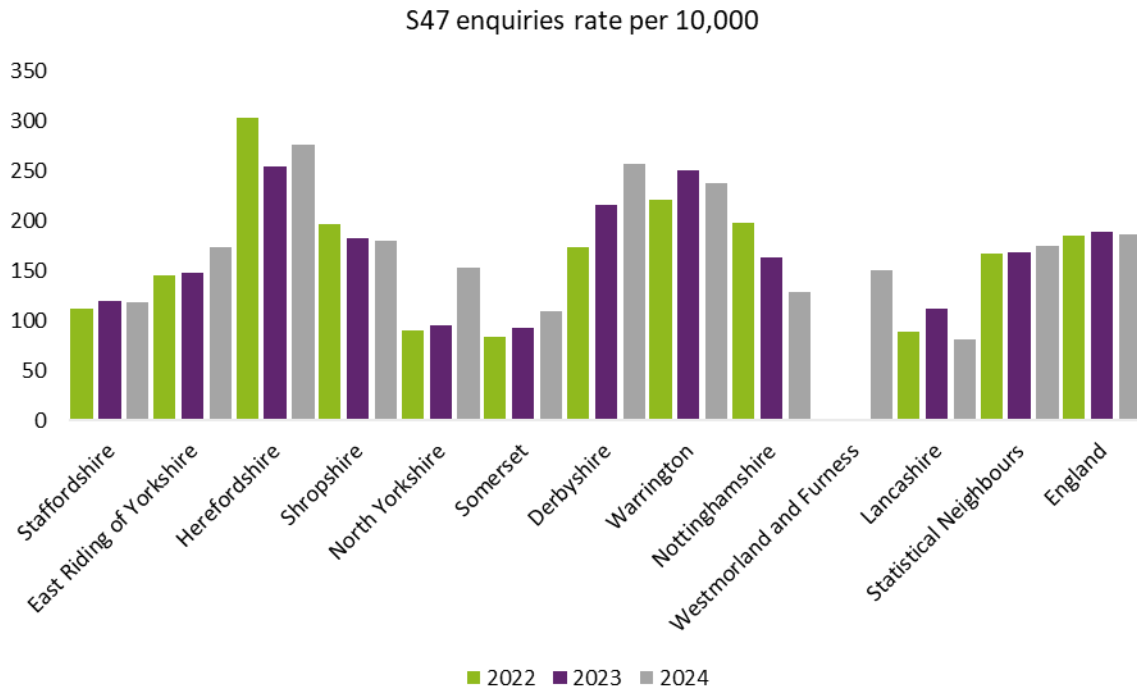
Children’s social care – Staffordshire

Referrals – rate per 10,000, re-referrals and no further action

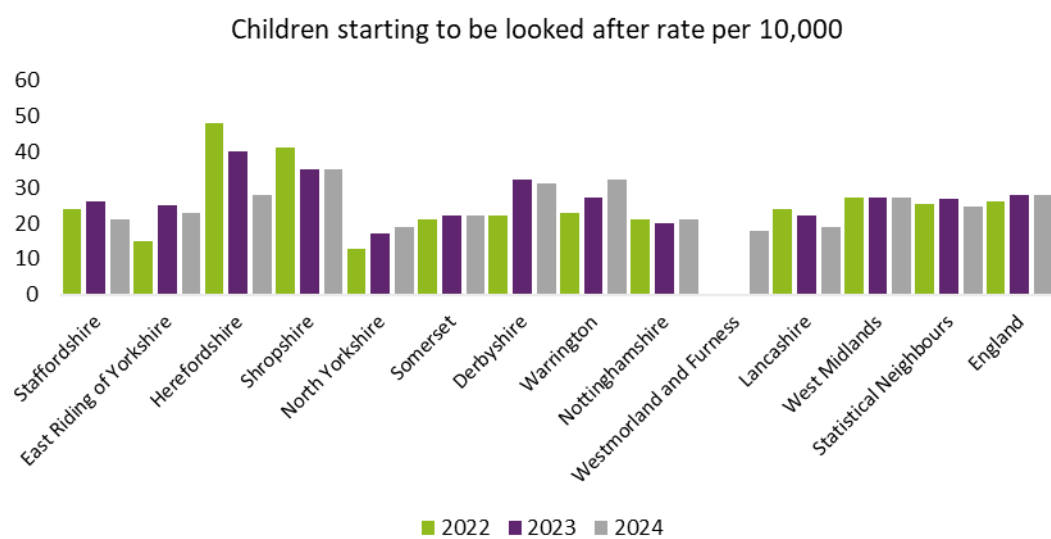
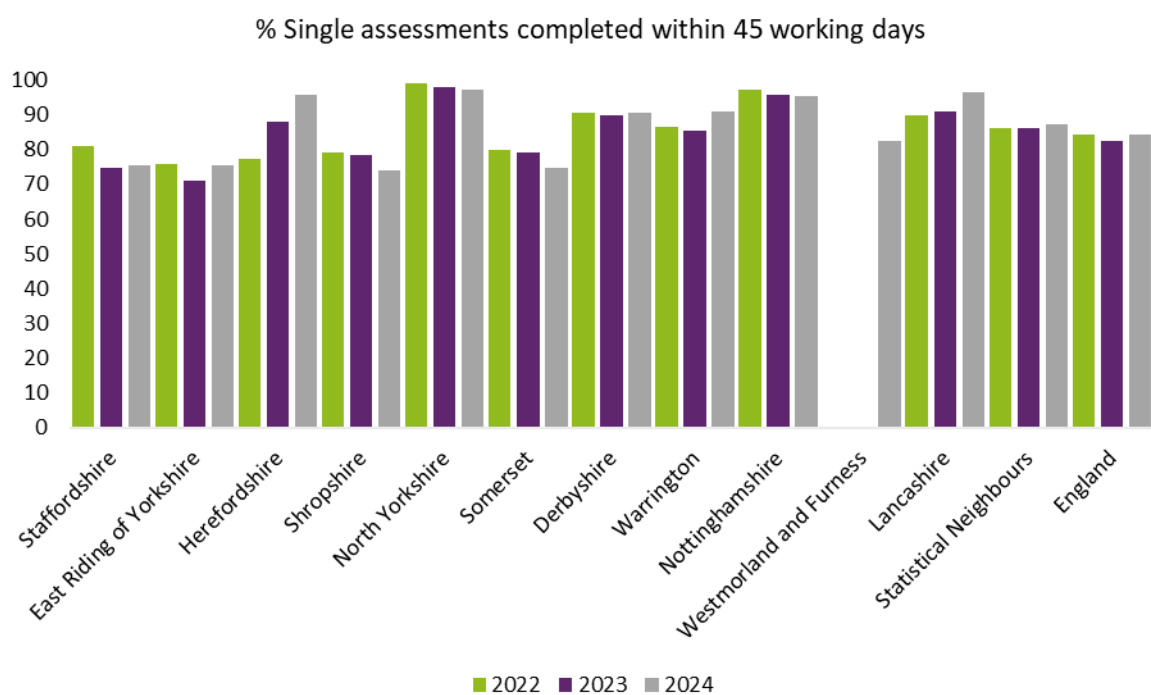


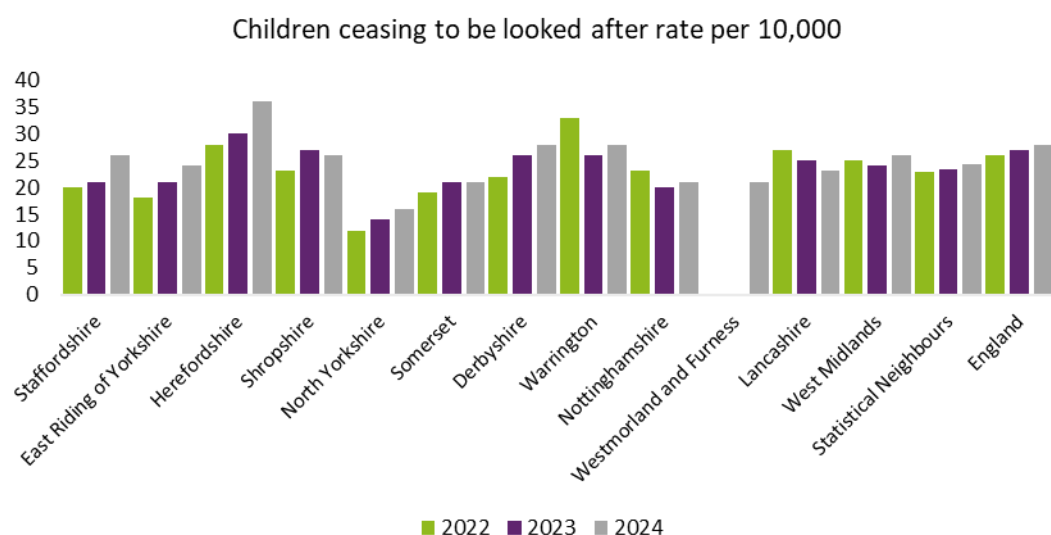


Children in Need and Child Protection



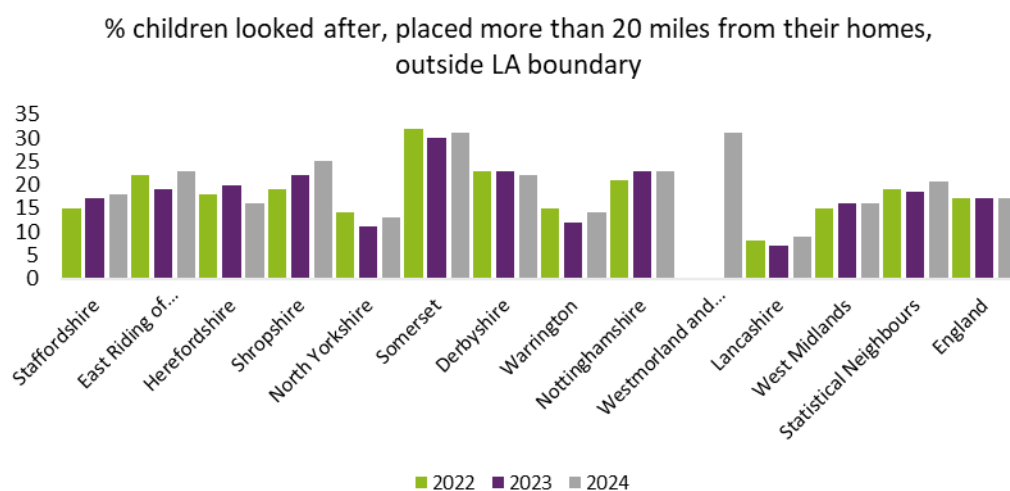
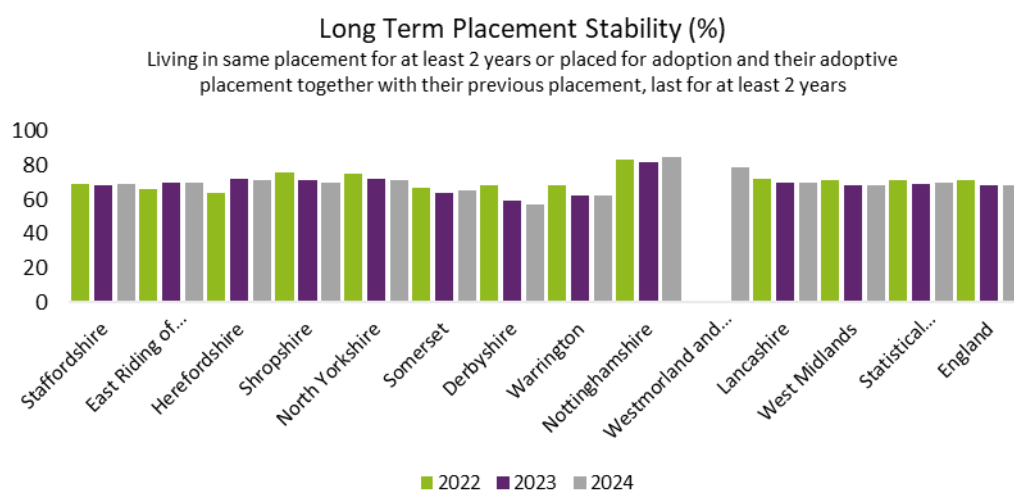
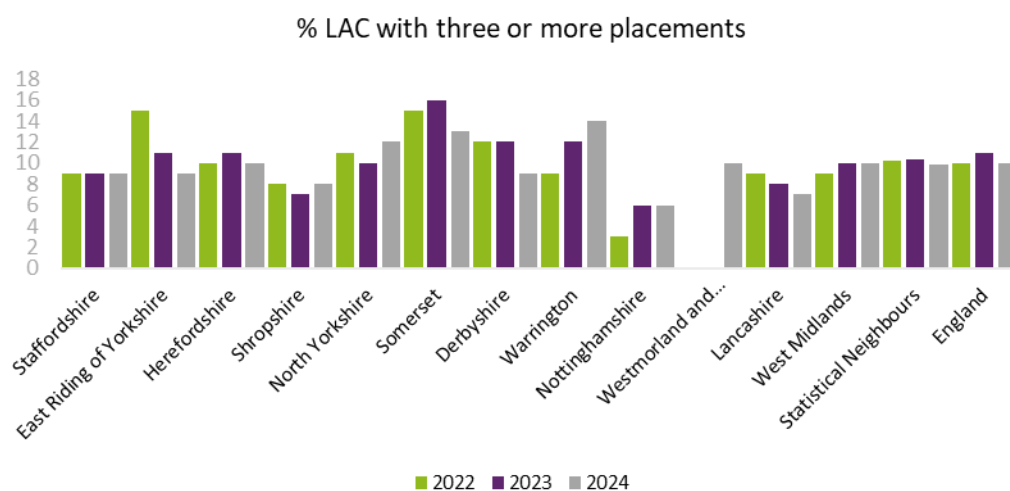
Looked after children

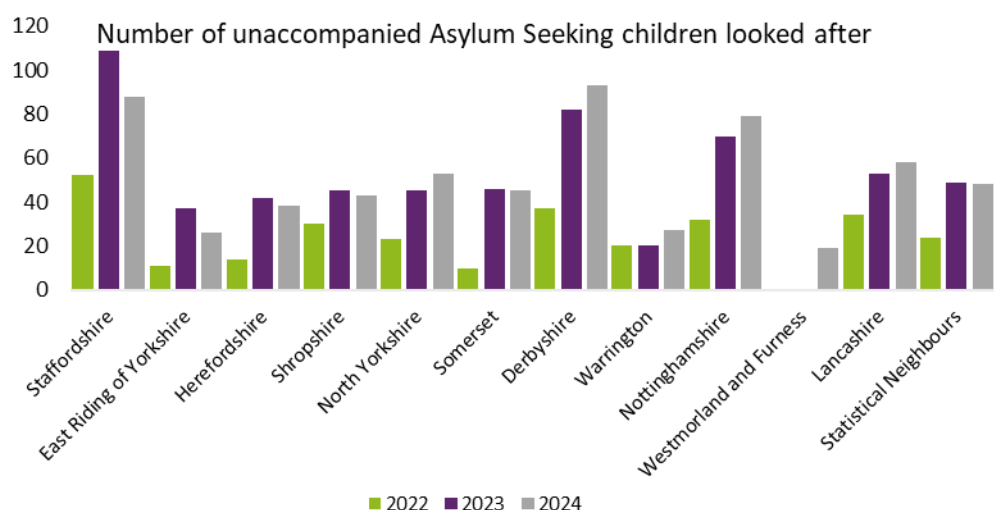




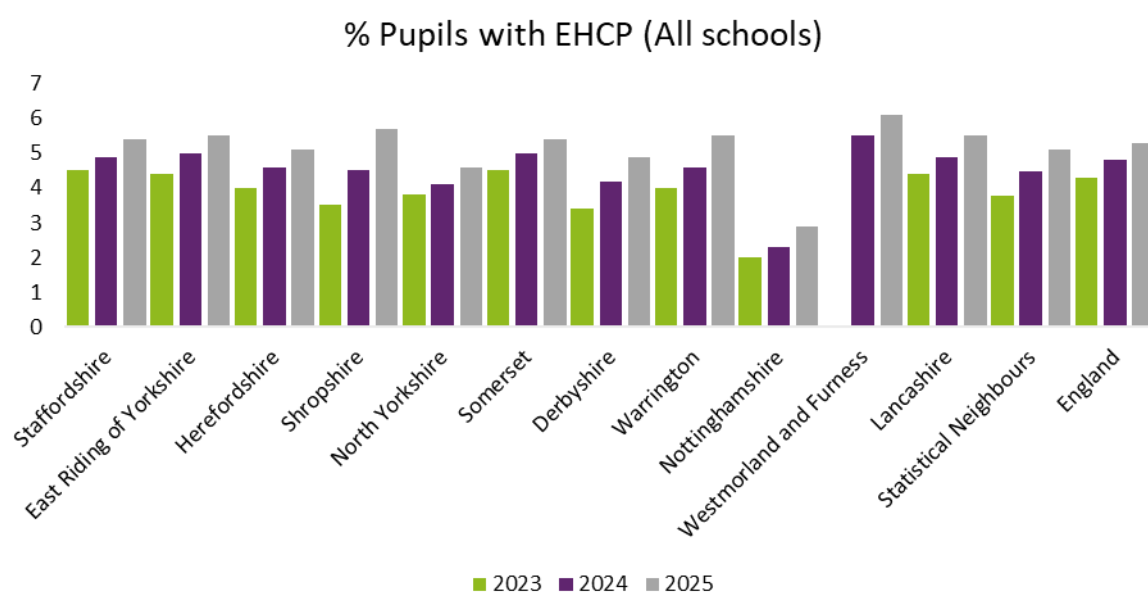
- LAC is slightly above SNs, but has been pretty stable over the last 3 years
- The number of children starting to be looked after fell and the number ceasing to be looked after saw an increase in 2024. This net reduction will reduce some of the budgetary pressure in this area

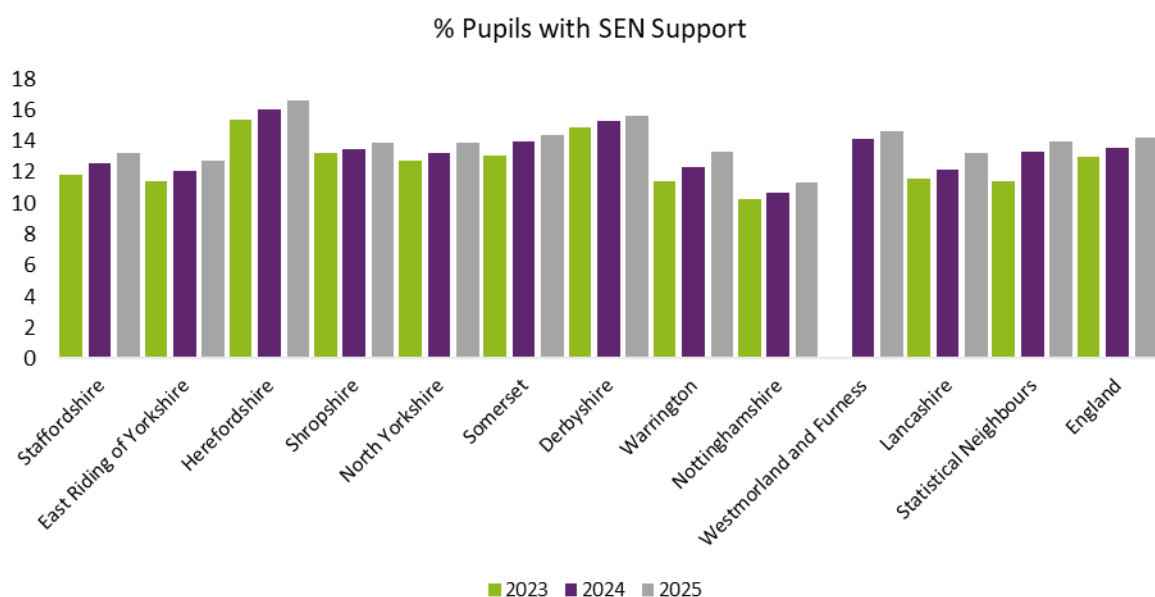
Looked After Children – placements





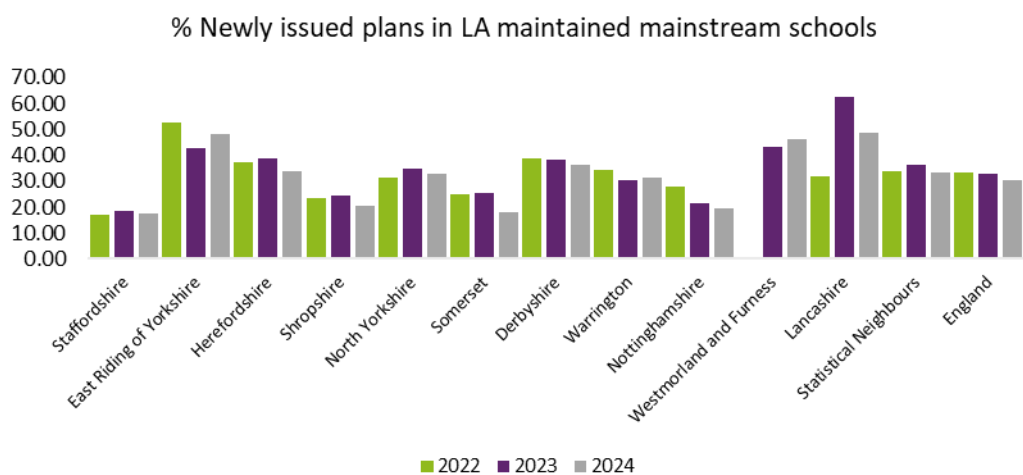
SEND EHCP and SEN support

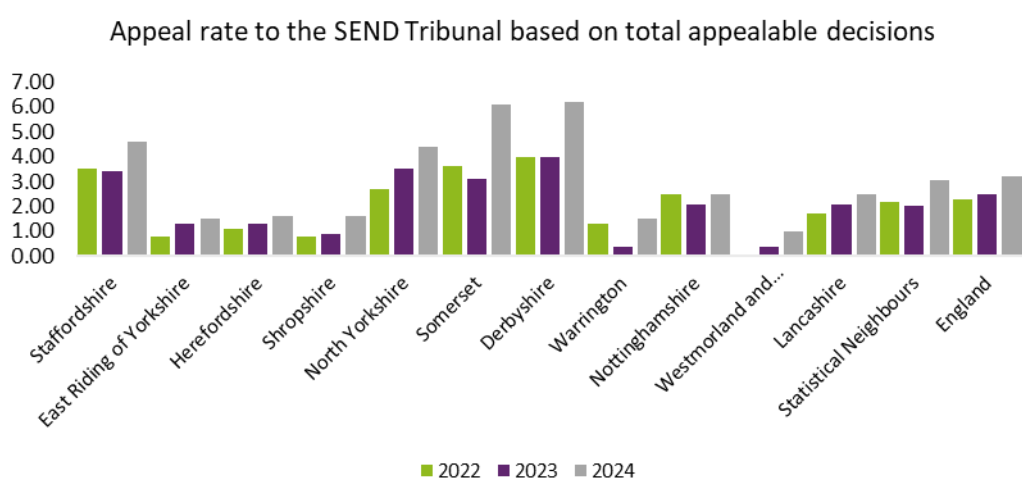
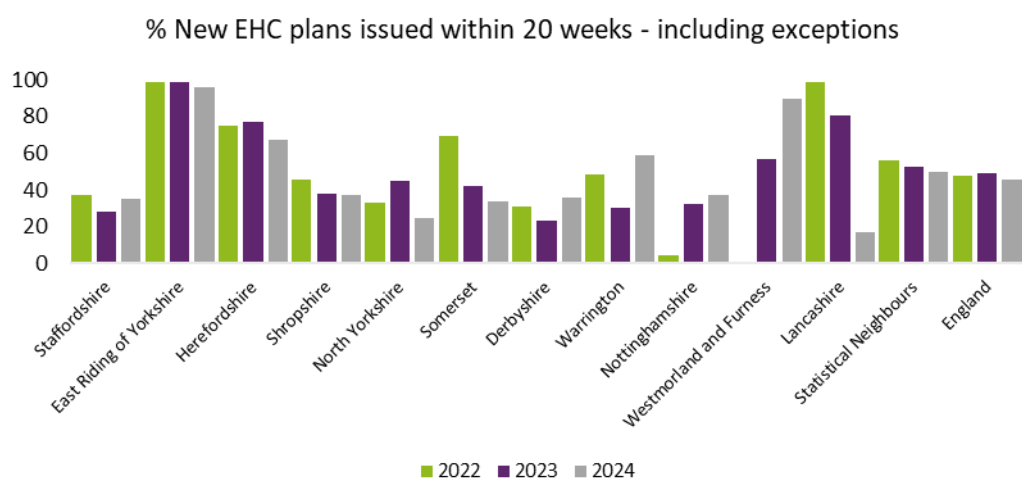




- % of pupils with an EHCP and % pupils in receipt of SEN Support, whilst increasing in line with the national picture are in line with statistical neighbours

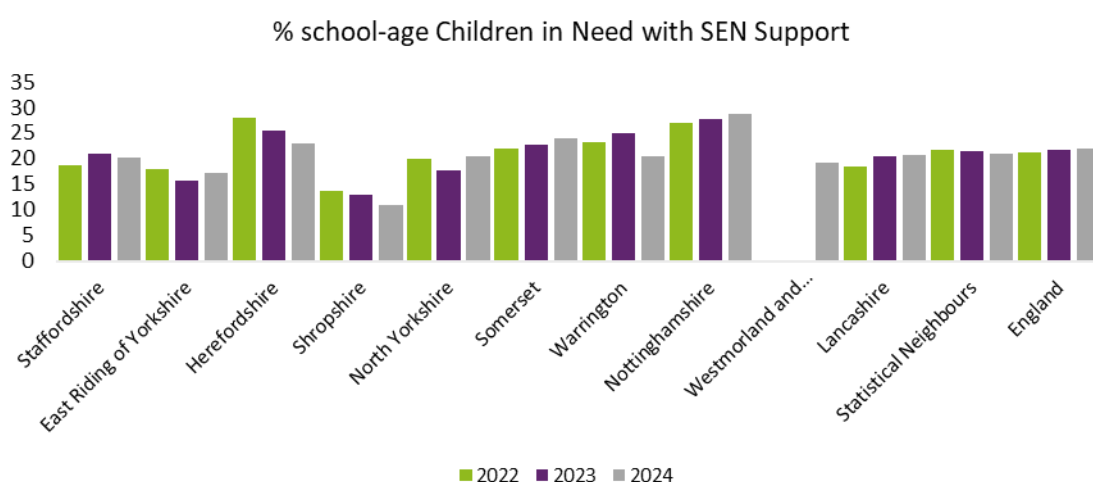
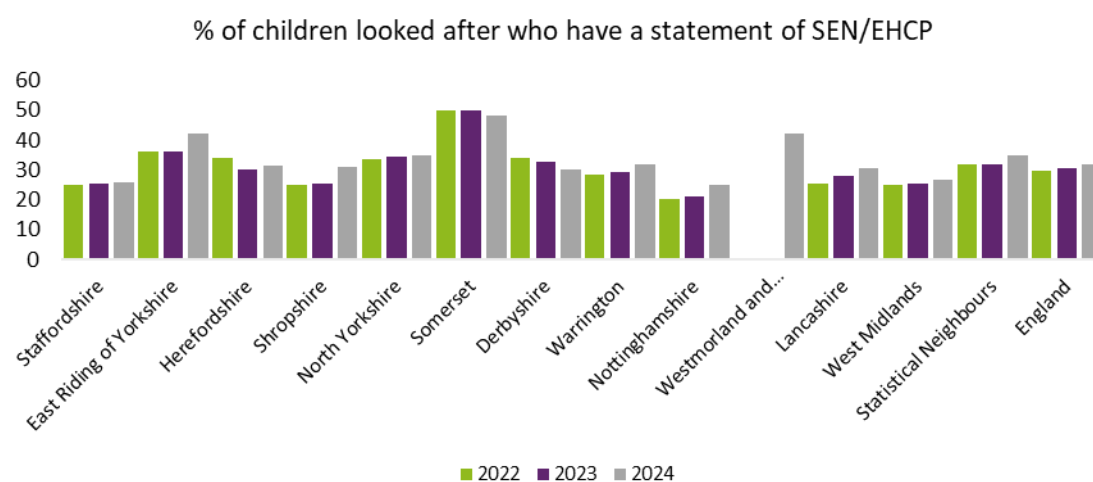
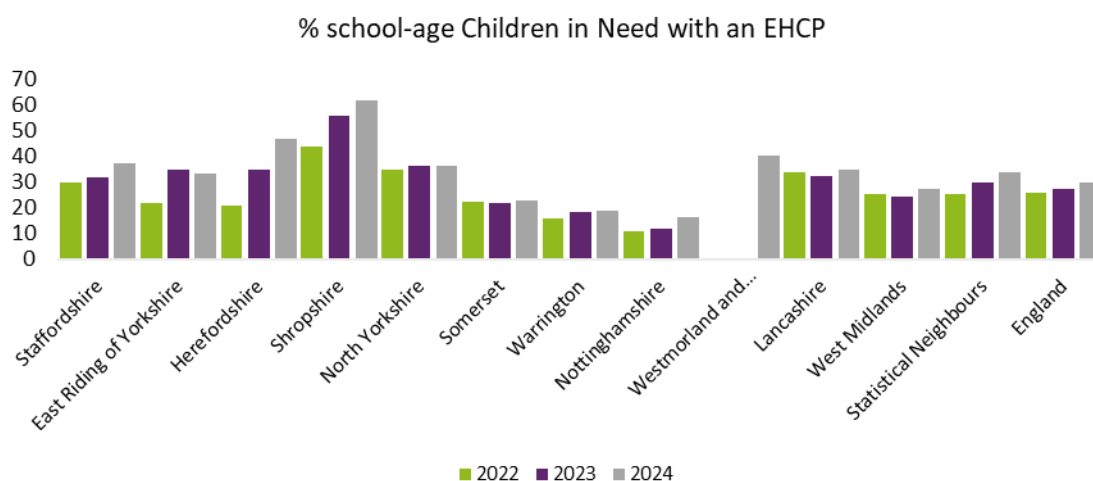
SEND – EHCPs and SEN Tribunals



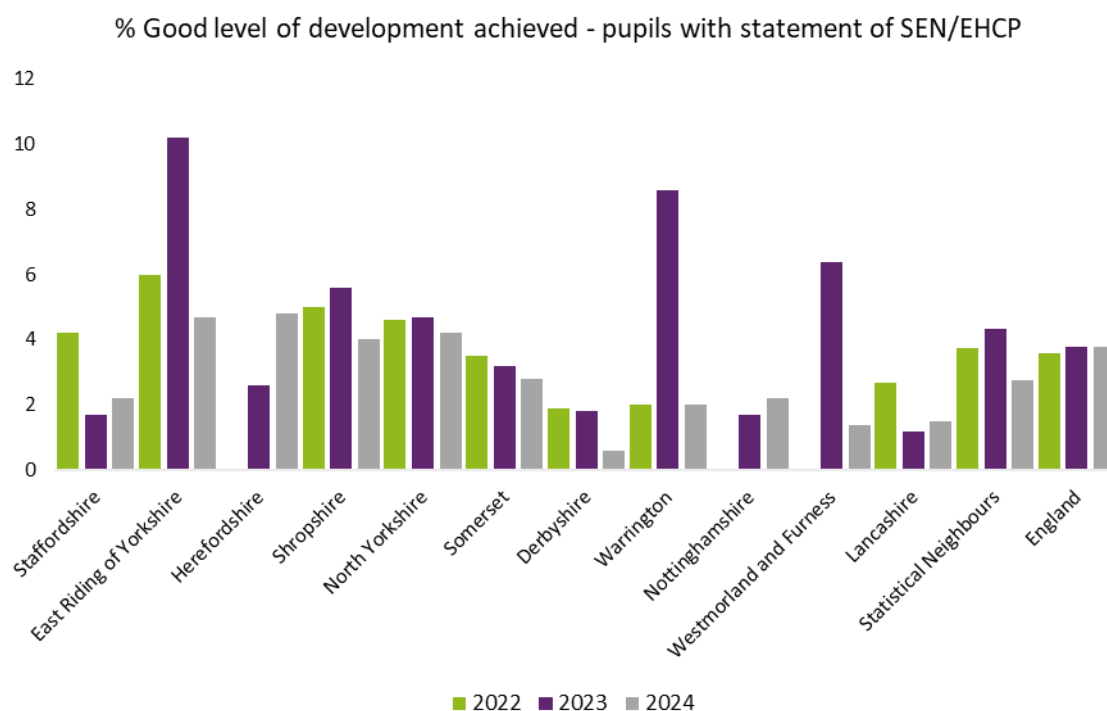


- Number of plans issued in LA maintained schools is low which would indicate a higher dependency on special schools
- Also low % of EHC plans issued within 20 weeks
- Appeal rate is high 4.6 versus 3.05%

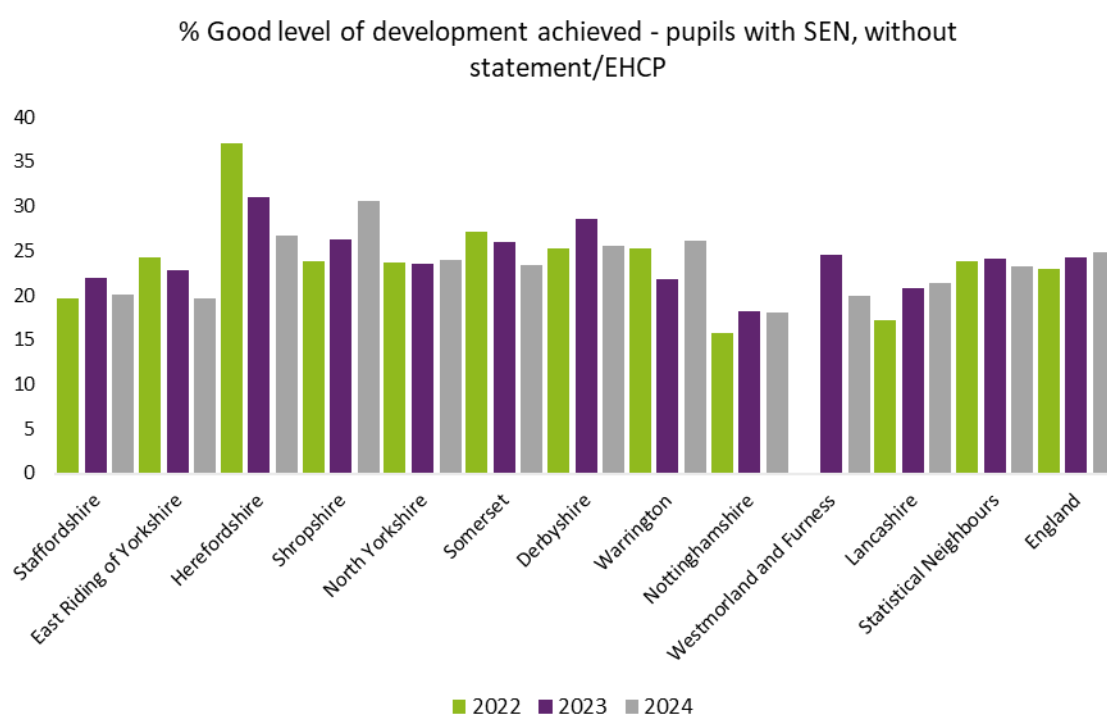
SEND – EHCPs and SEN support – CiN and LAC



Foundation stages

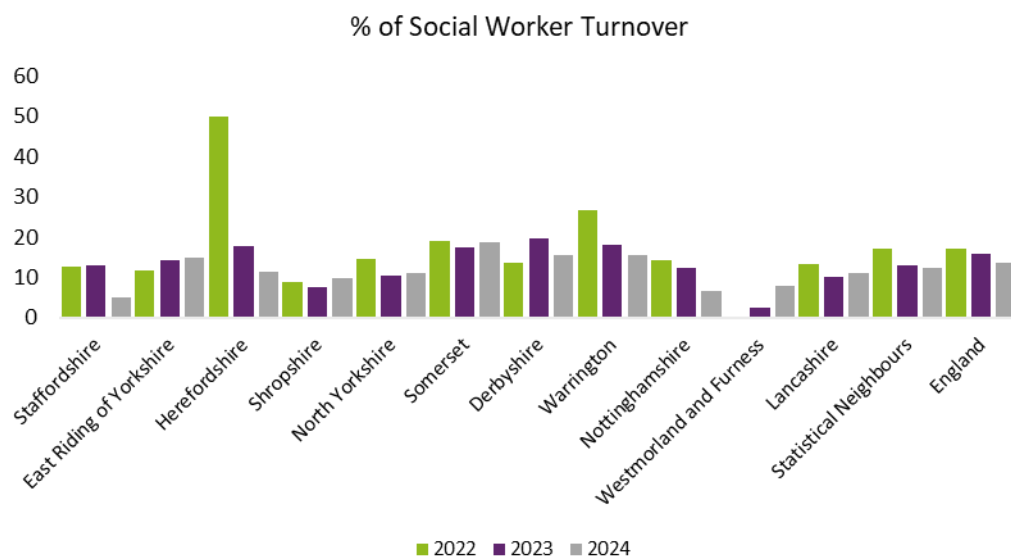


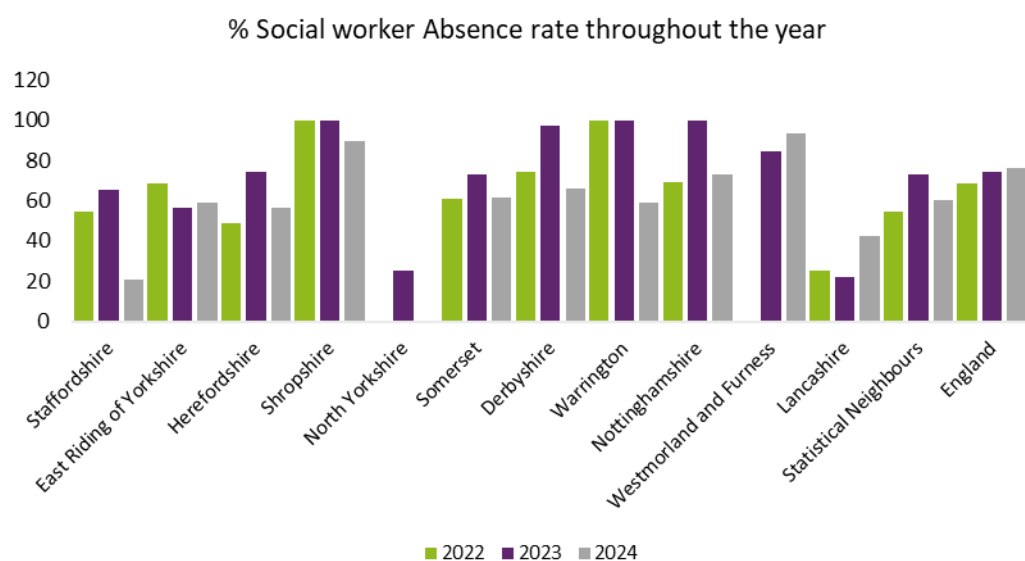
Note: 2020 and 2021 data missing so 2019 retained for comparison



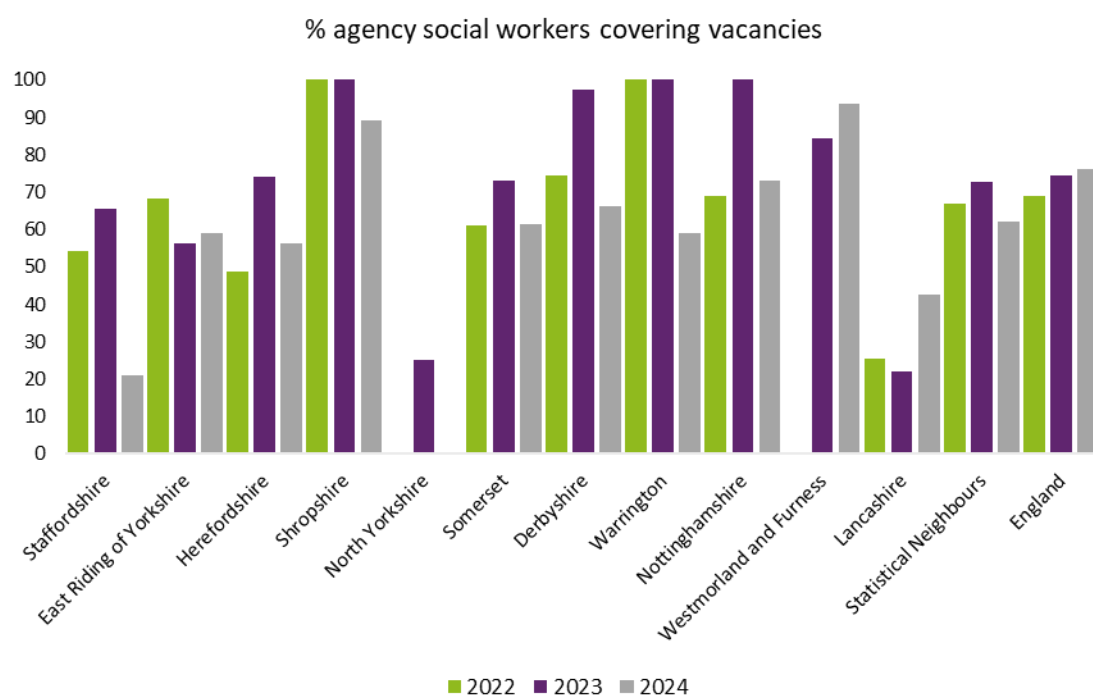
- Above indicates a lower level of development for pupils with SEN than Staffordshire SNs.

Children's Workforce part 1

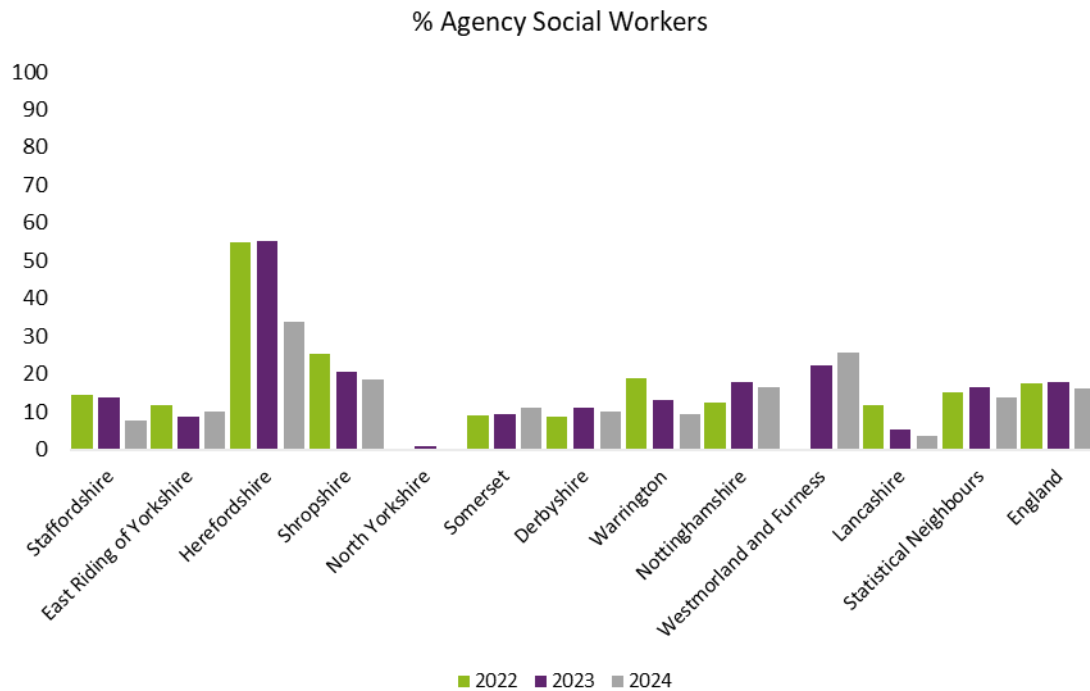




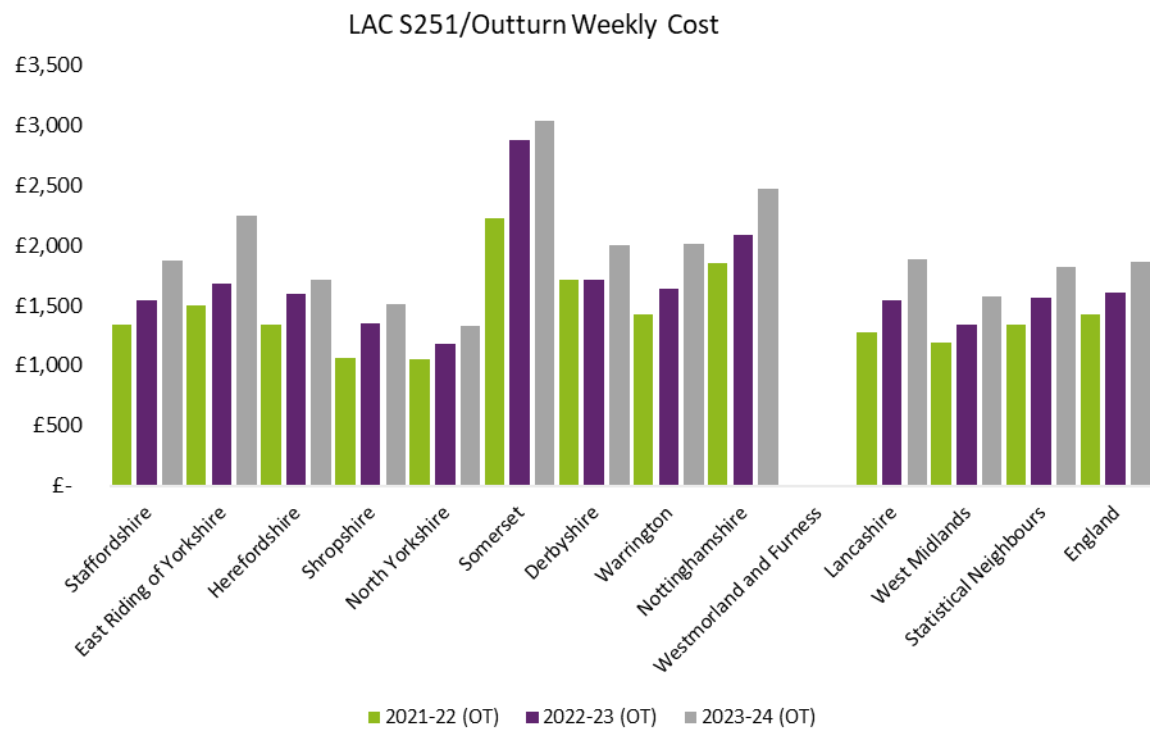
Children's Workforce part 2

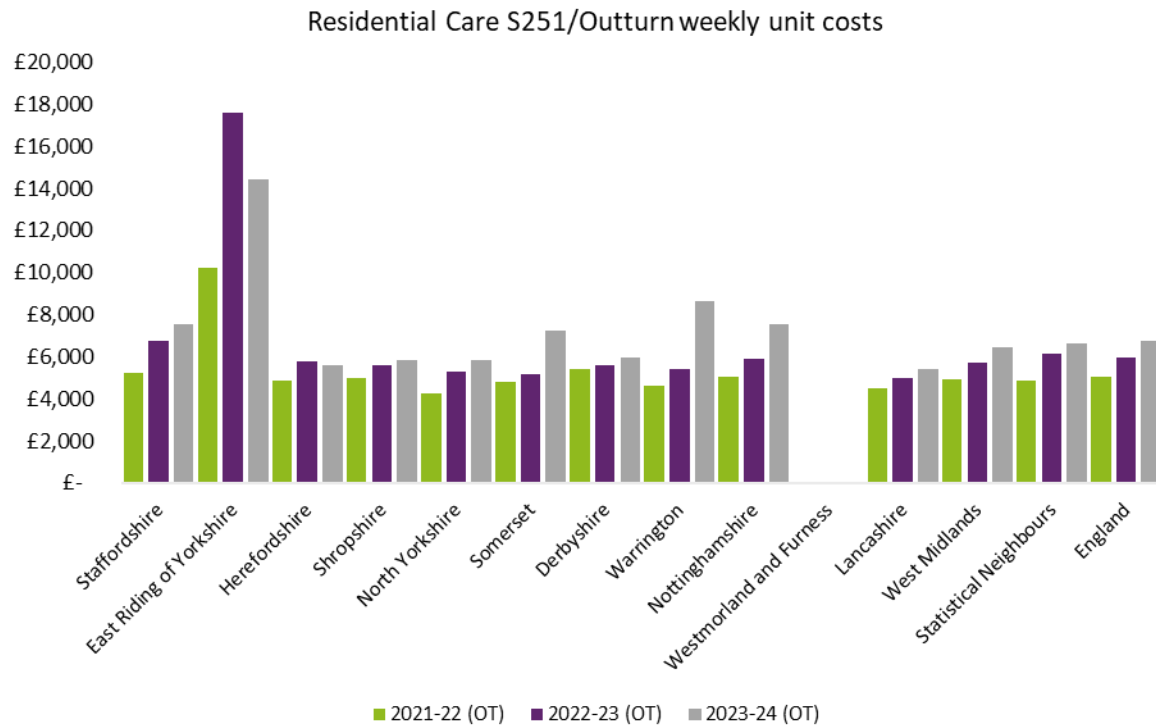


Note: % agency social workers covering vacancies - % above 100 are accurate reporting figures



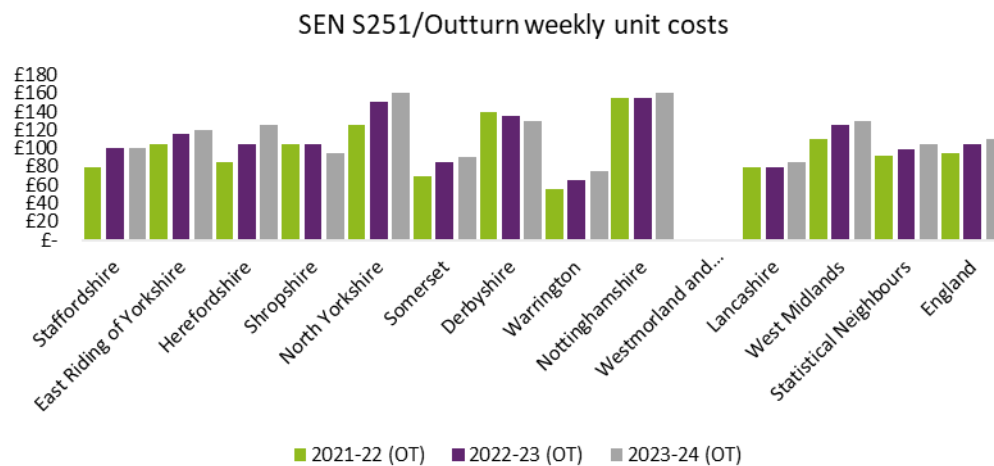
Finance – average weekly costs

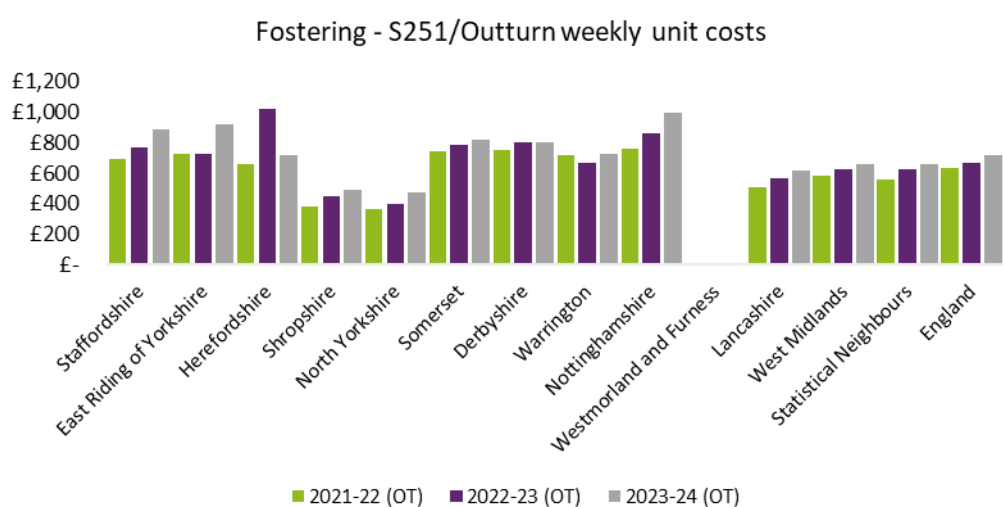
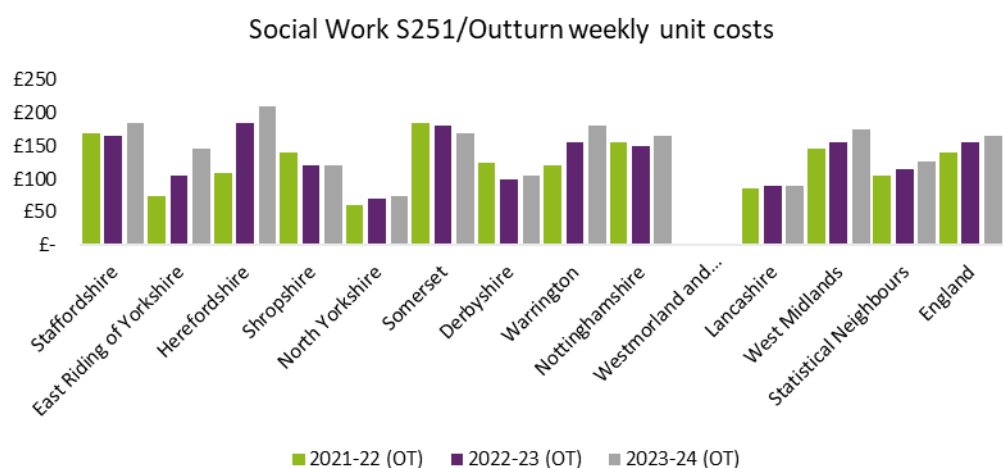




- Costs are in line with statistical neighbours for Looked After Children weekly unit costs and also residential care, although increasing and whilst in line with the national picture it will be creating additional budgetary pressures
- Note average LAC weekly unit cost for a unitary/ metropolitan authority in 23/24 with a population below 250k was £1759 per week

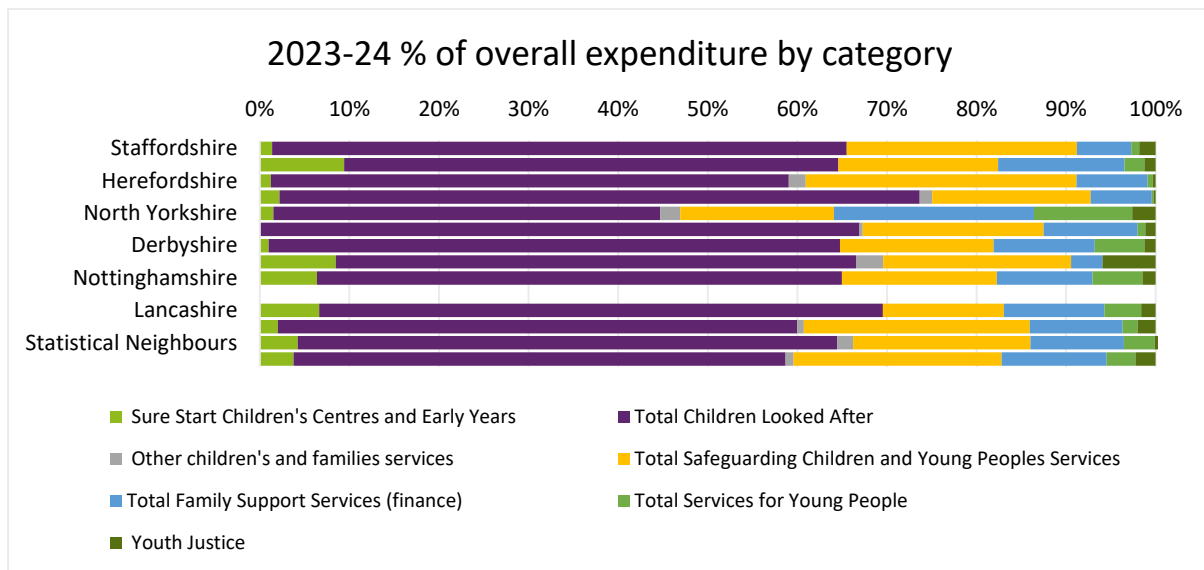
Finance – average weekly unit costs



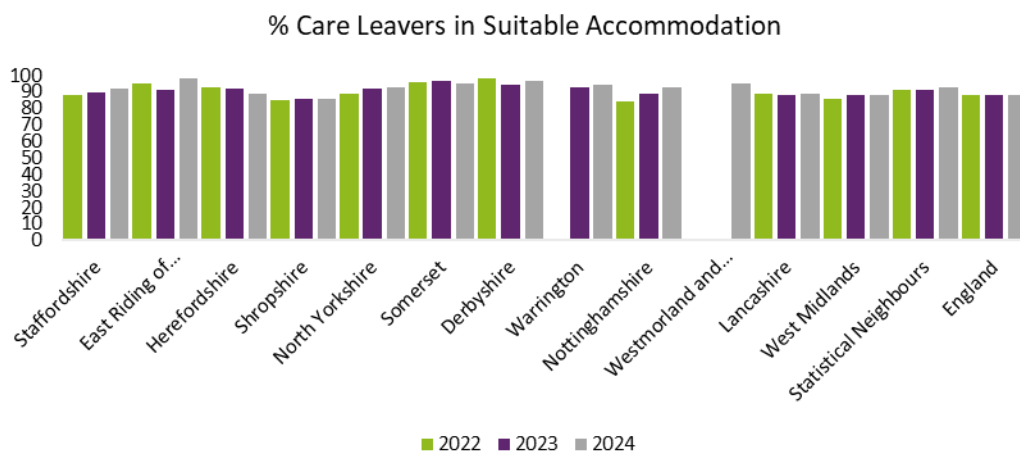
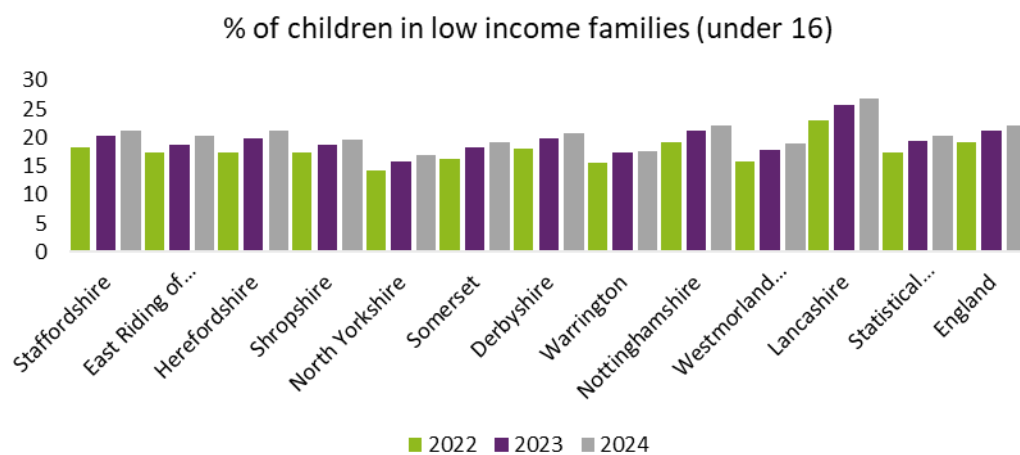


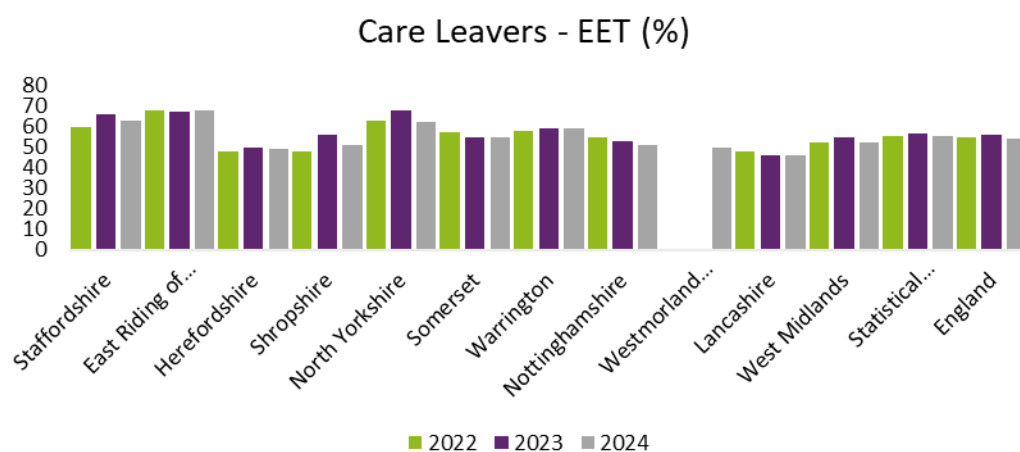
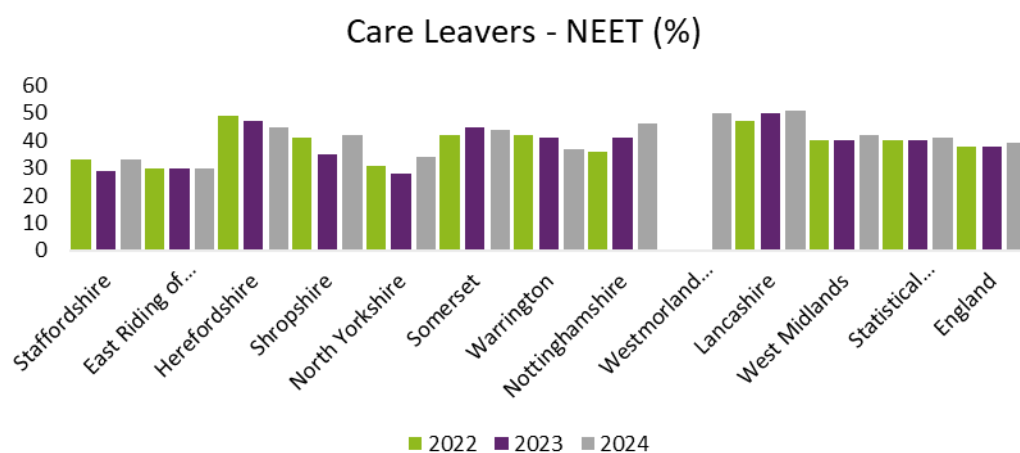
- SEN weekly outturn costs are in line with statistical neighbours at £100 per week compared to £104 statistical neighbour average
- Fostering weekly unit costs are higher at £890 versus £656 statistical neighbour average, this will also be impacted by the split of internal versus external foster carers, with LAs with high internal foster carers having lower weekly unit costs
- Social work weekly unit costs are also significantly higher than statistical neighbours. Appeal rate is high 4.6 versus 3.05%

Finance – Budget and expenditure



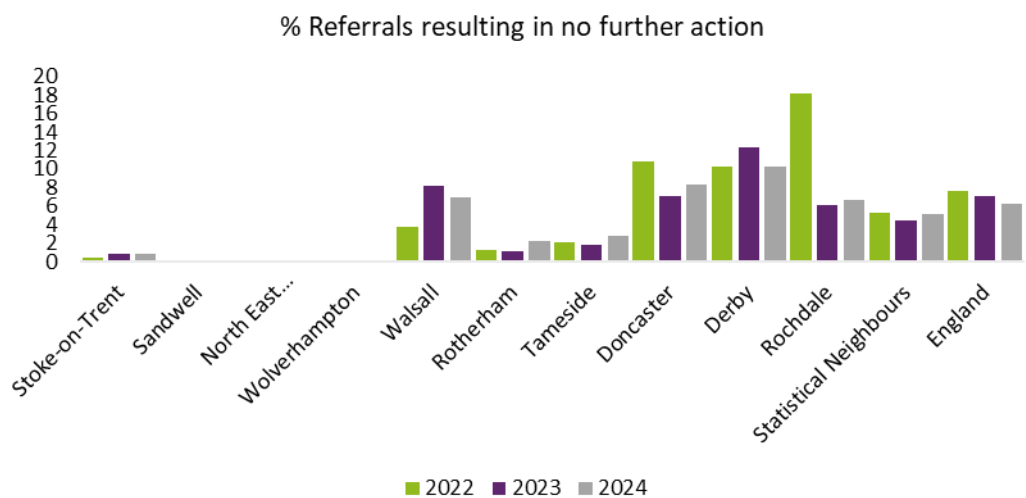
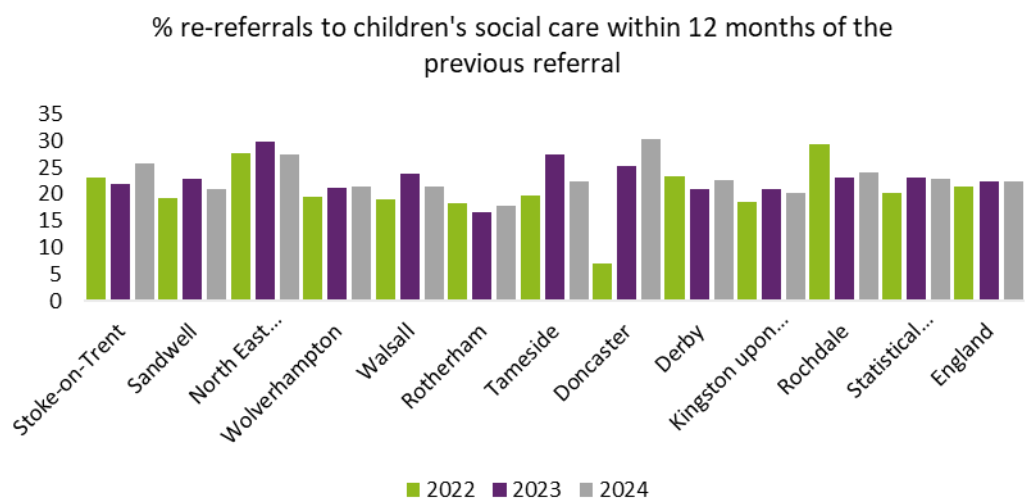
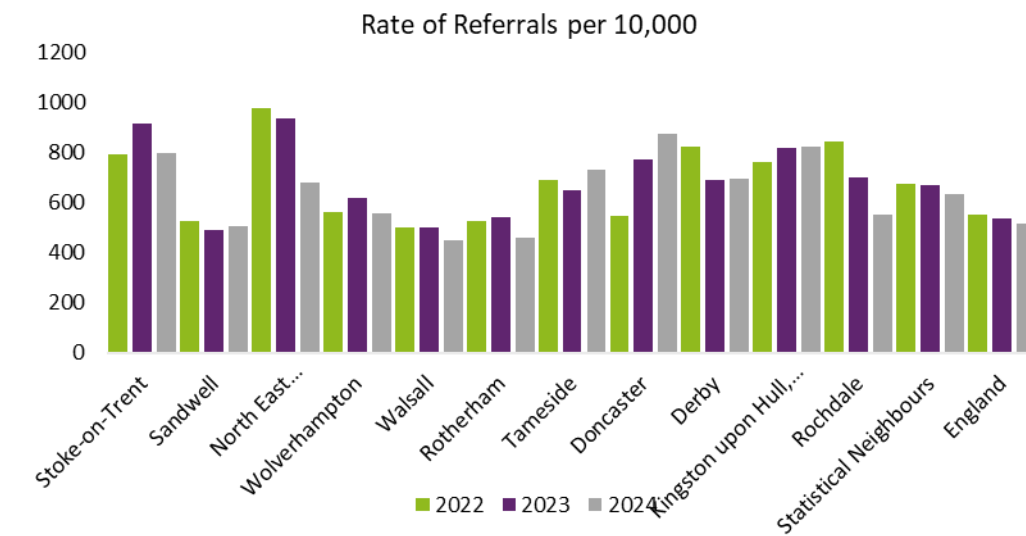
Wider Context



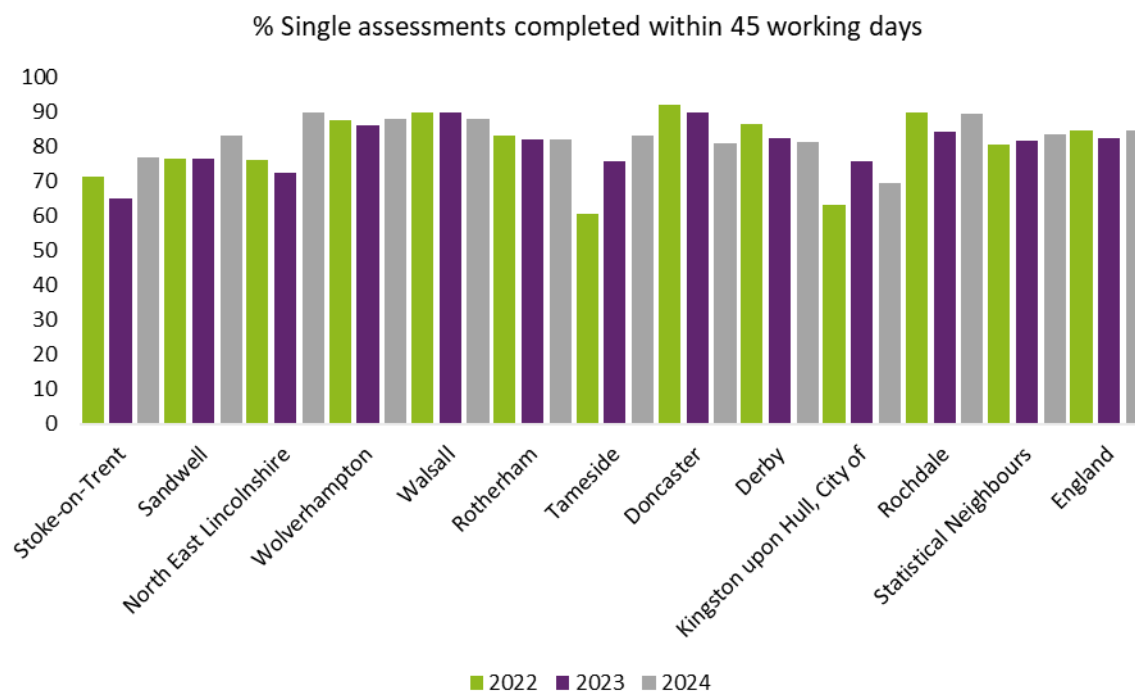
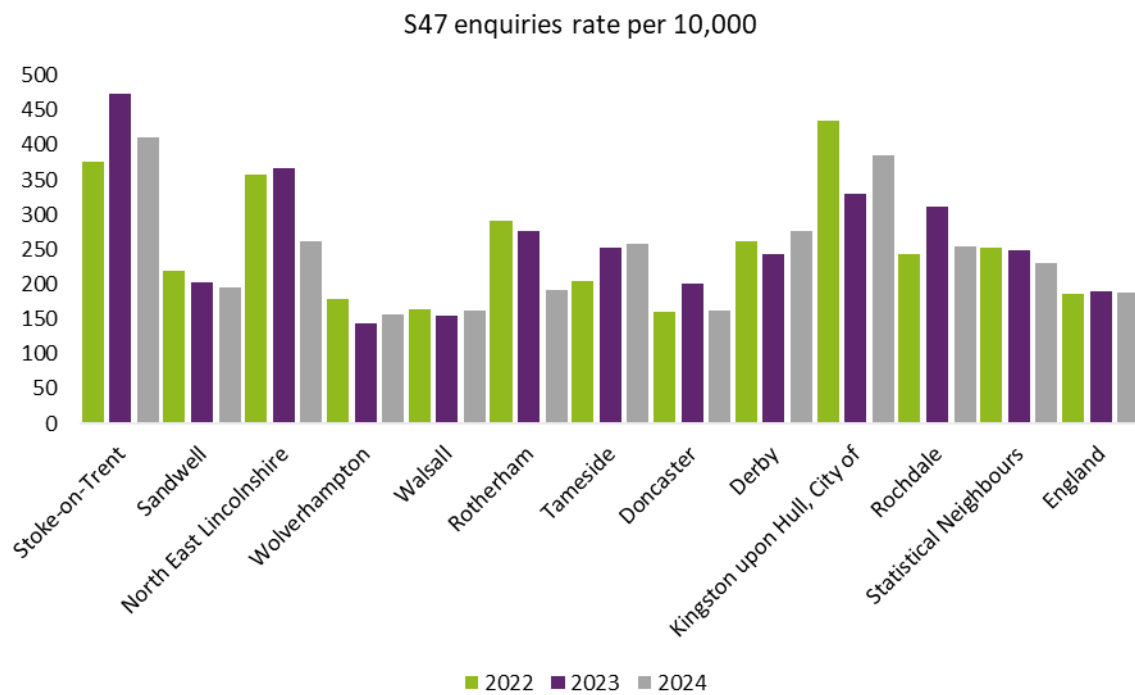


Children's social care – Stoke-on-Trent

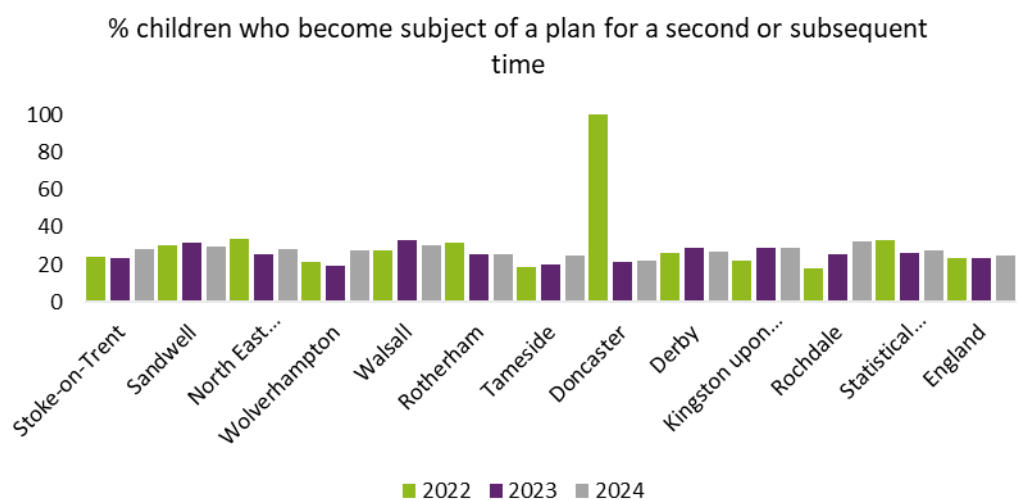
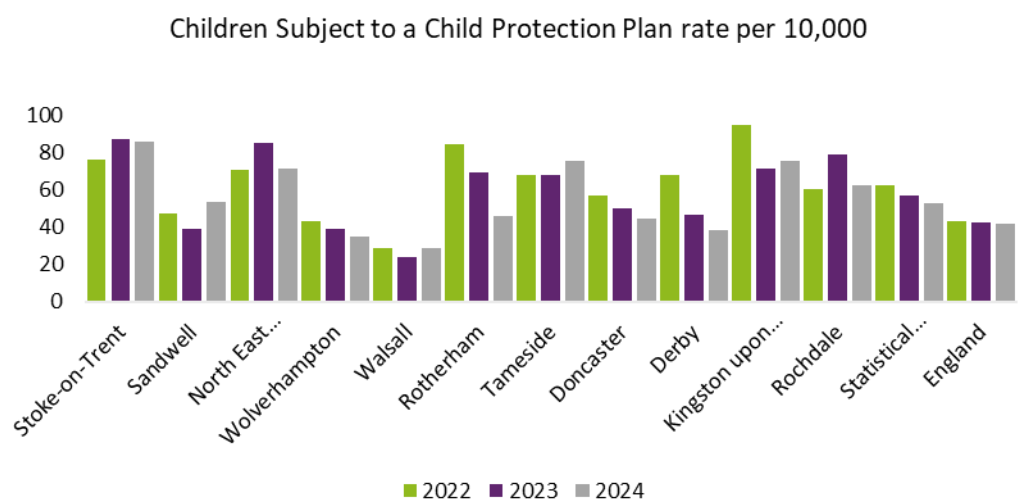
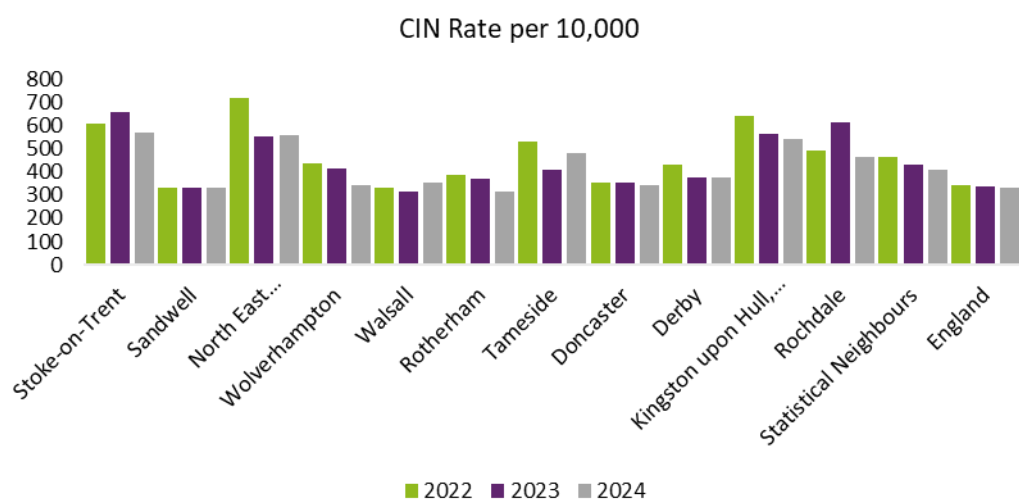
Referrals – rate per 10,000, re-referrals and no further action



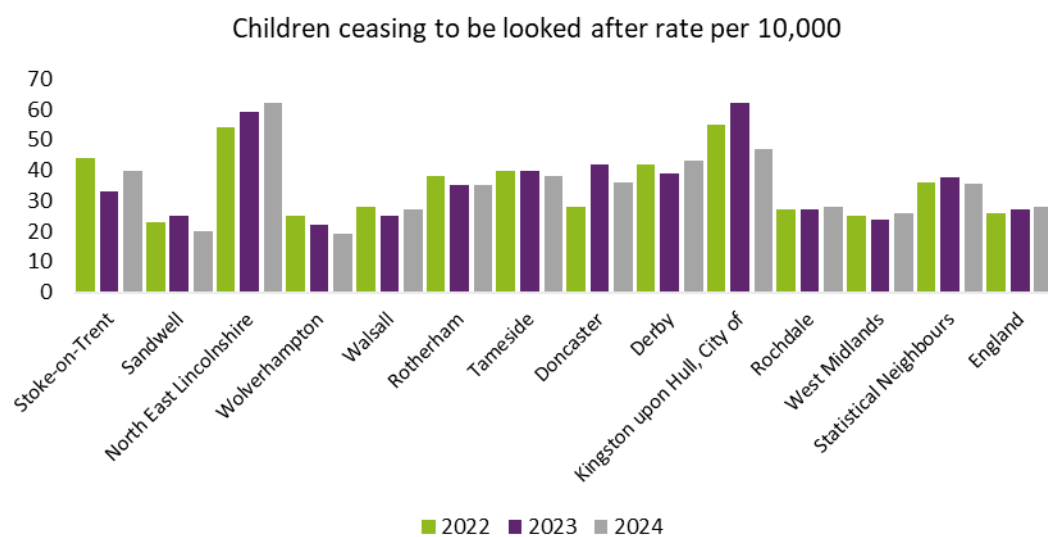
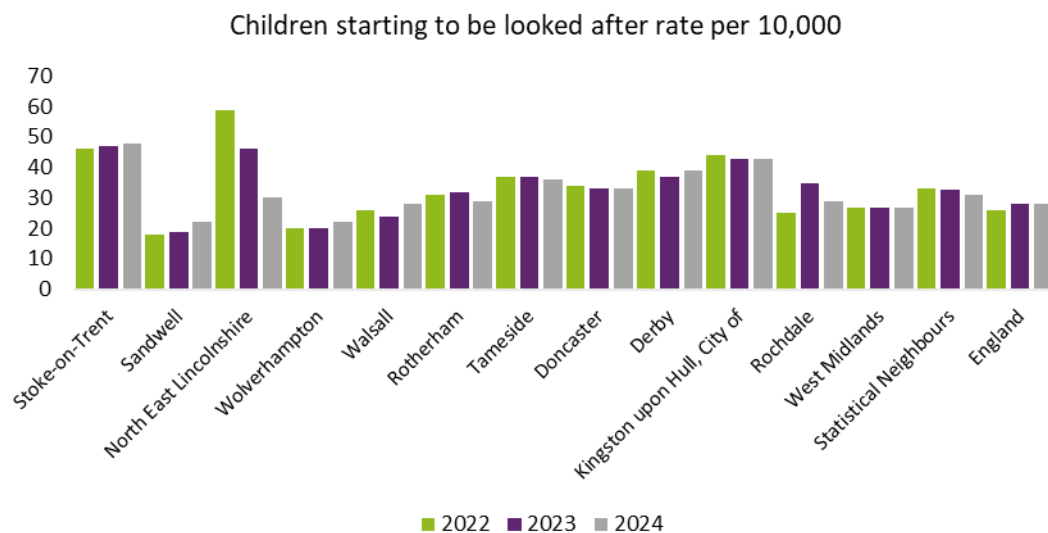
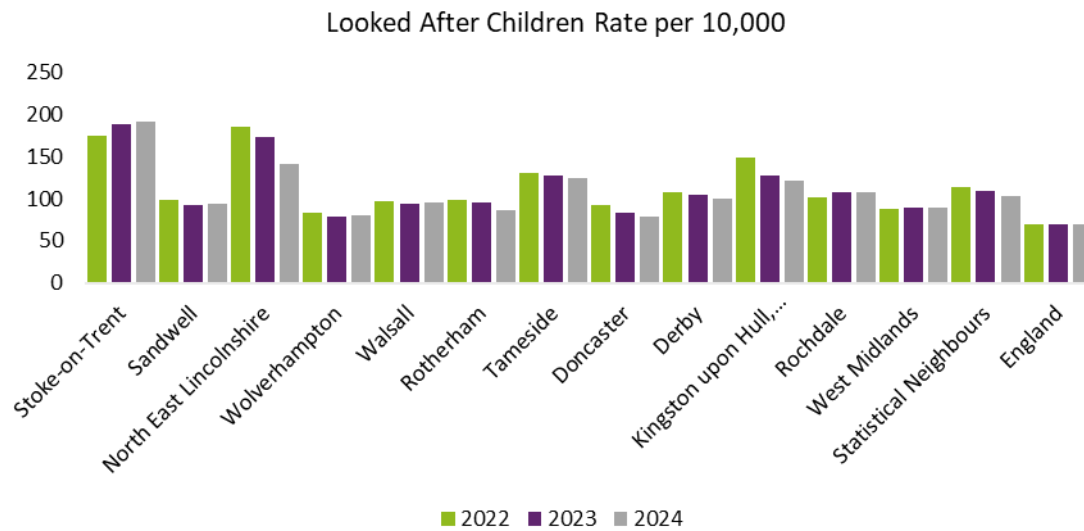
Children in Need and Child Protection



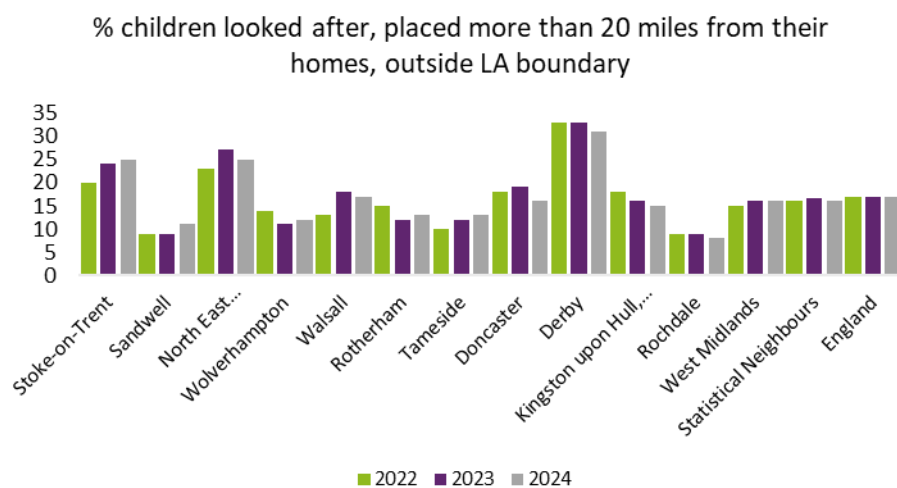
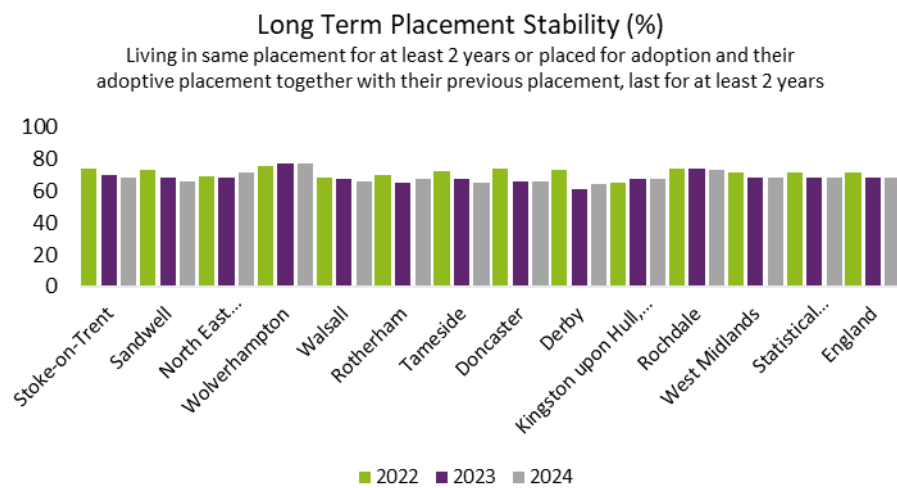
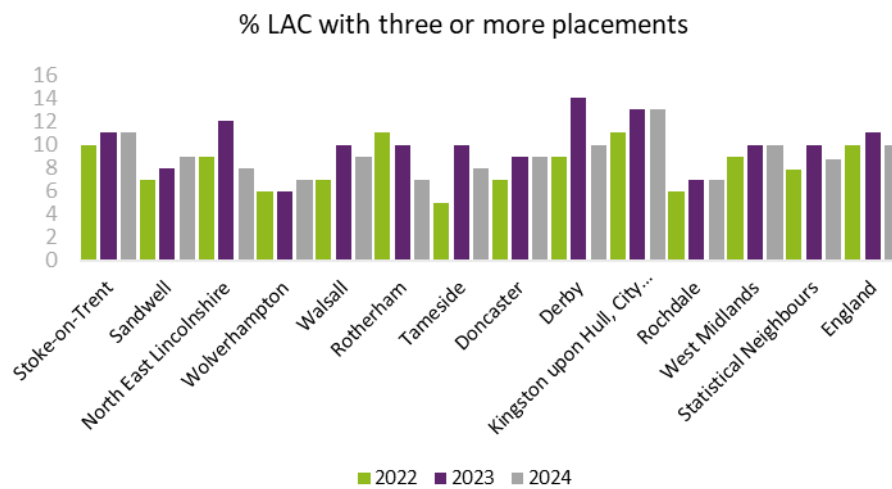
Children in Need and Child Protection

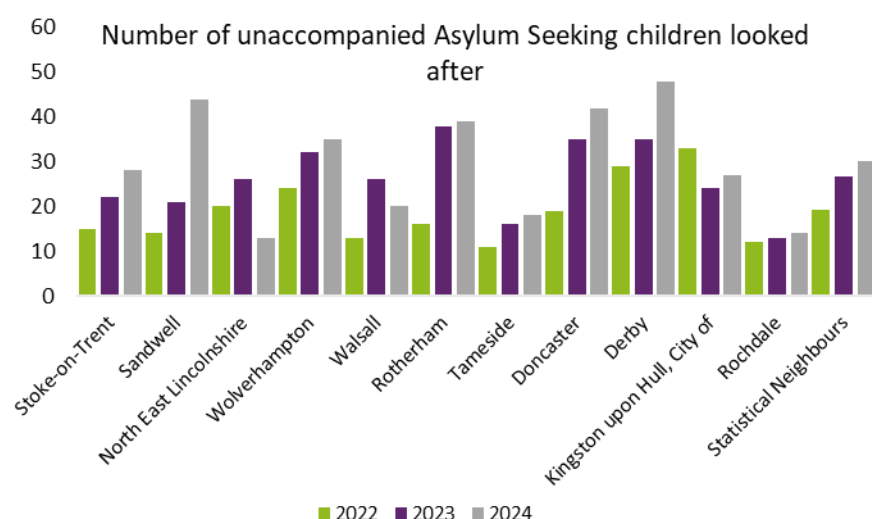


Looked After Children

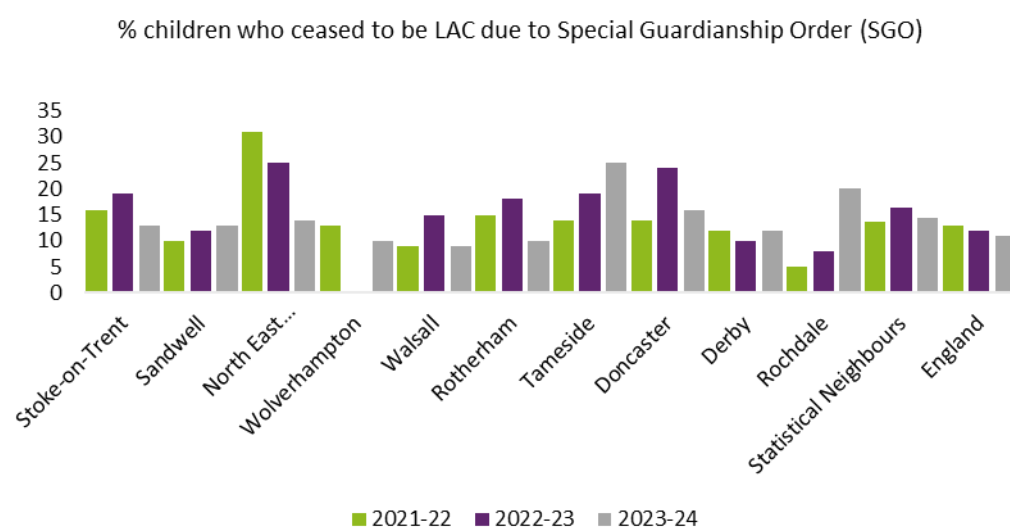
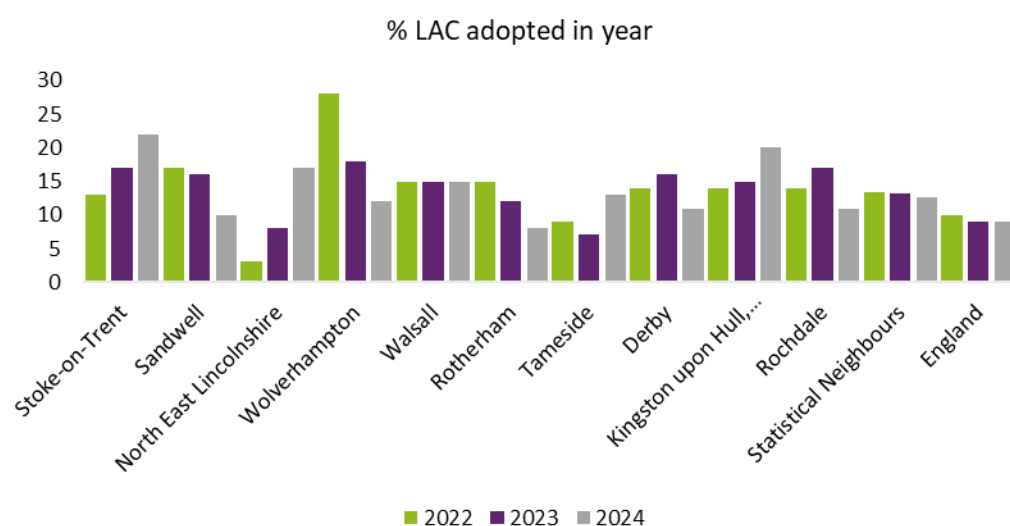


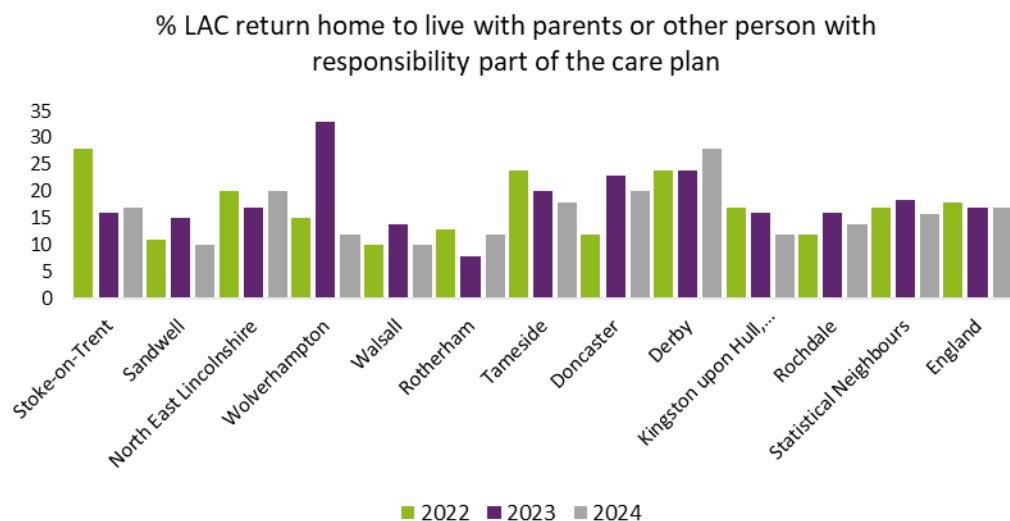
Looked After Children – placements



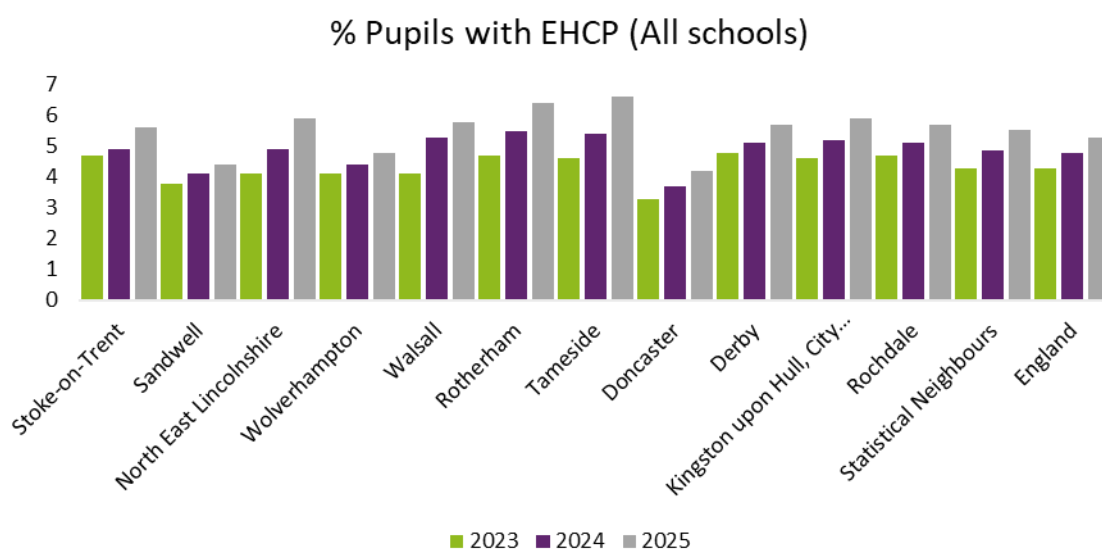


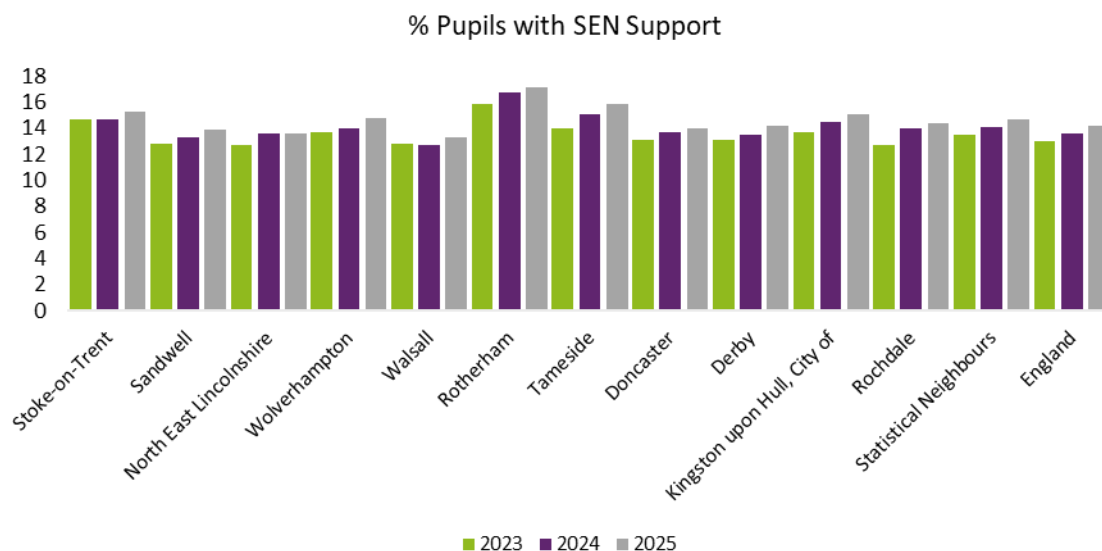
Looked After Children – Adoption, Special Guardianship Order and Returning Home





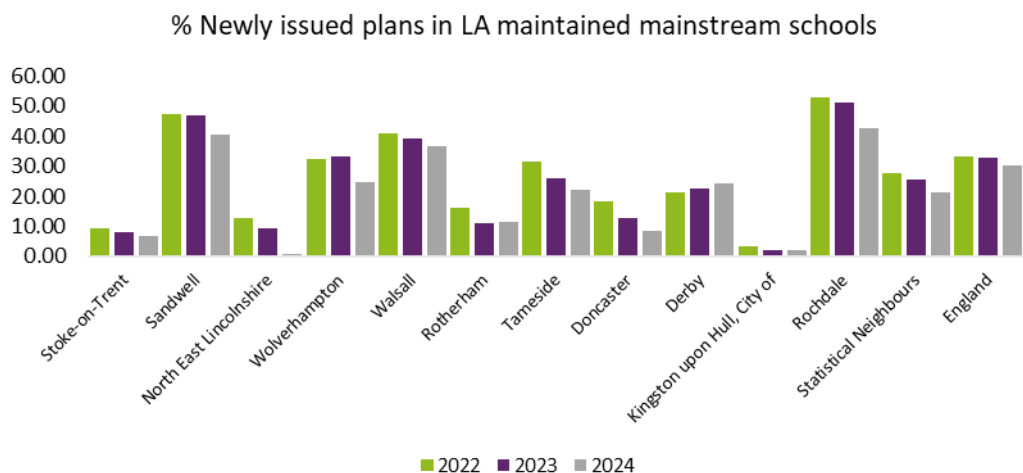
SEND EHCP and SEN support

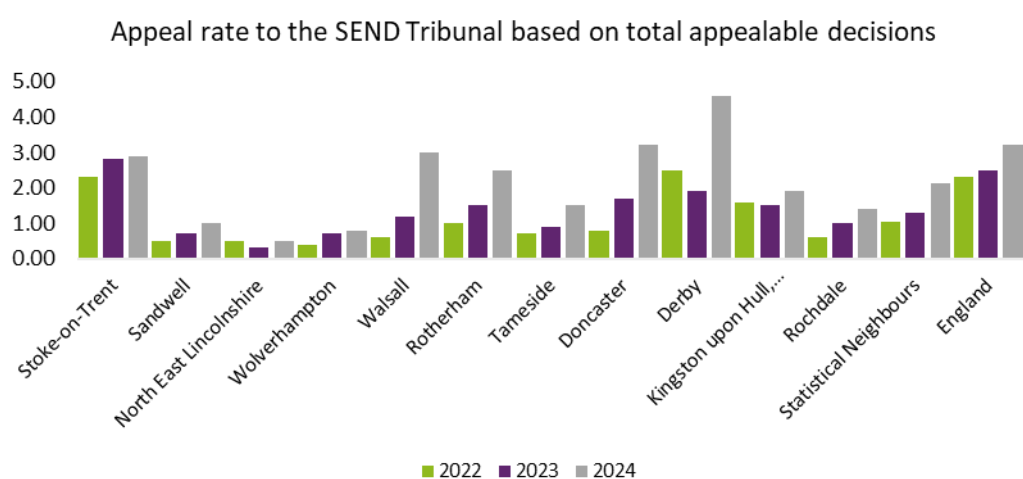
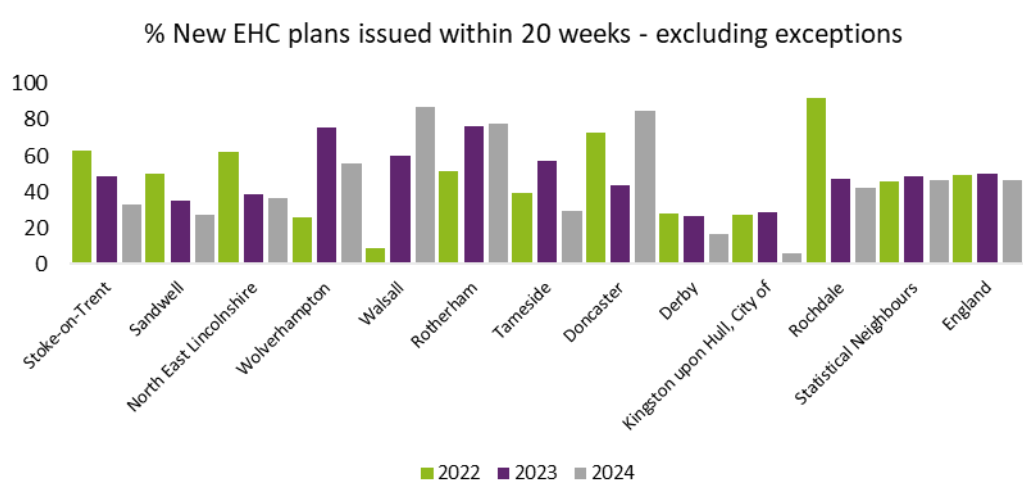
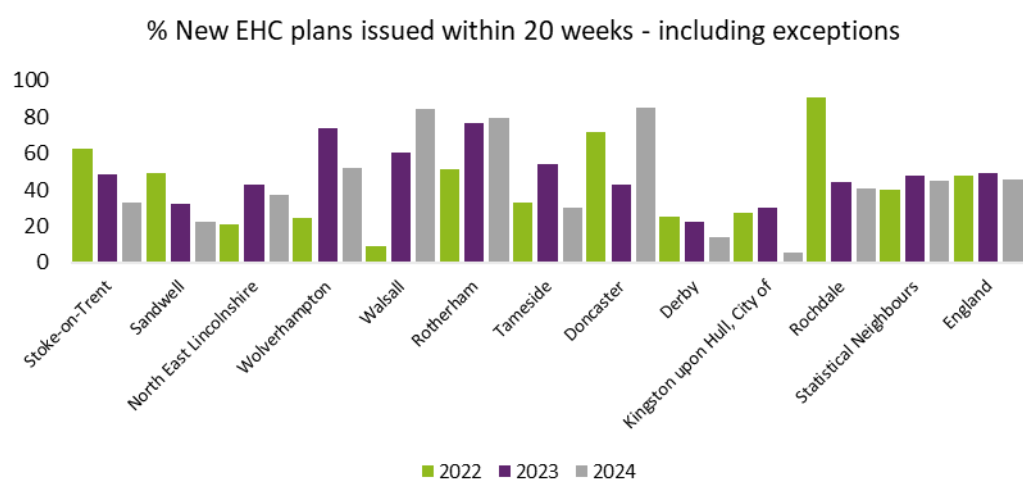




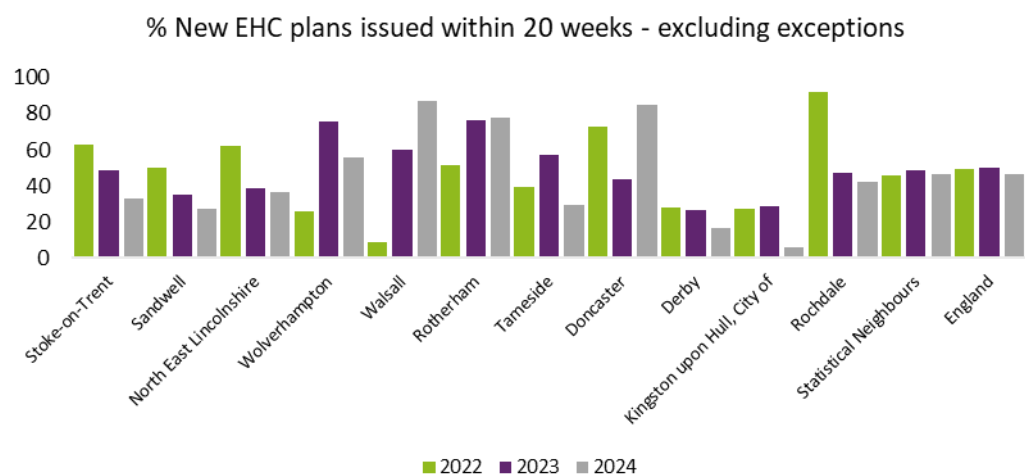
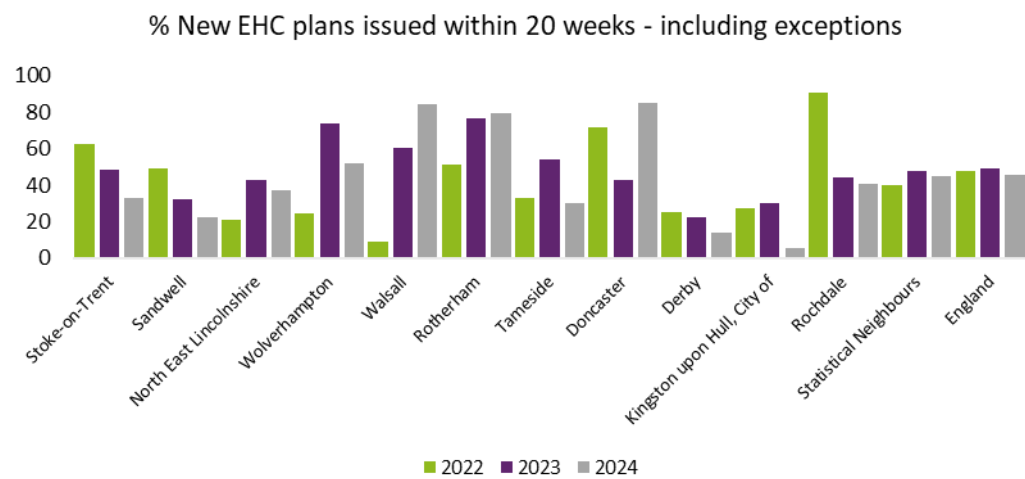
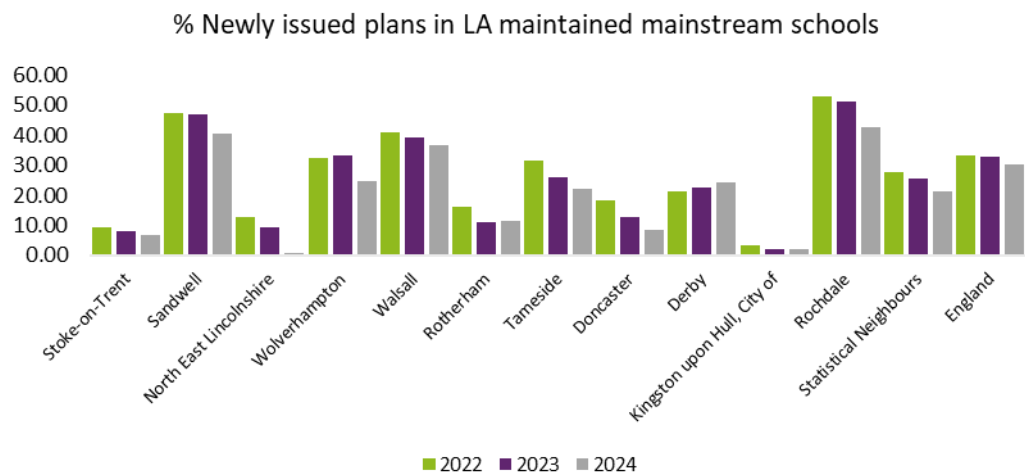
- EHCP and SEN support numbers are in line with statistical neighbours, but as indicated on the following page number of EHCPs issued with 20 weeks are low and appeals high.

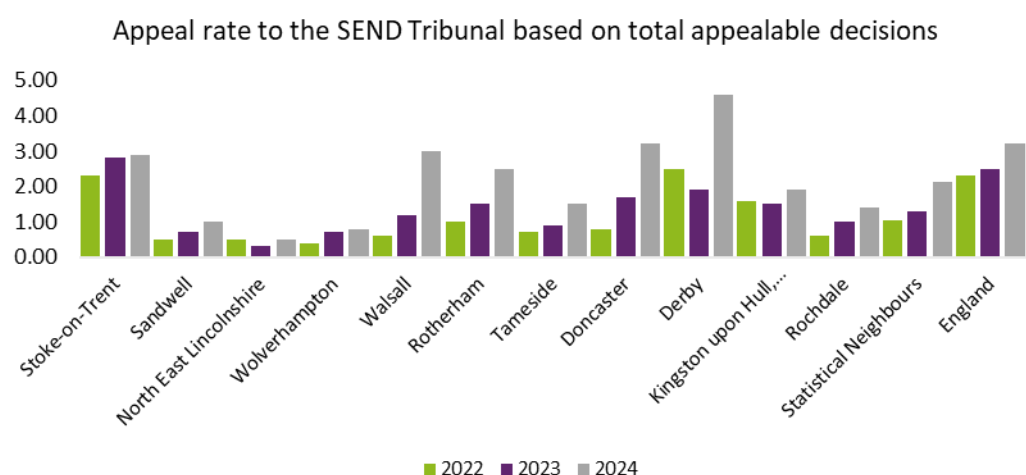
SEND – EHCPs and SEN Tribunals



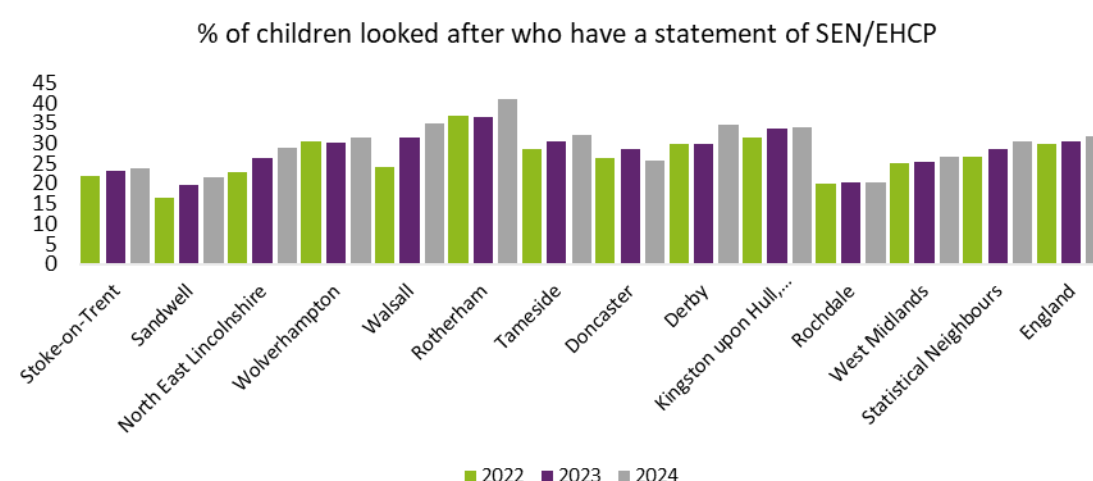
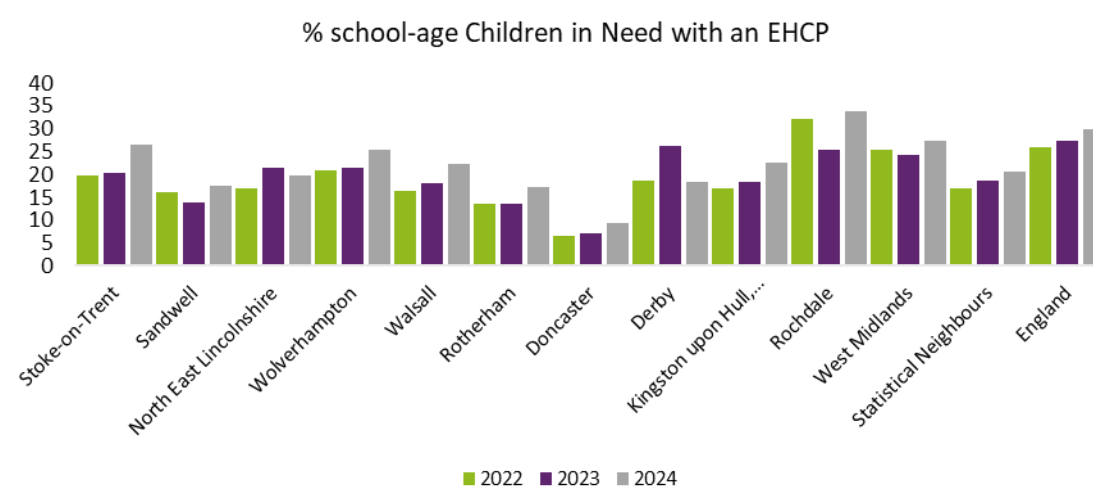


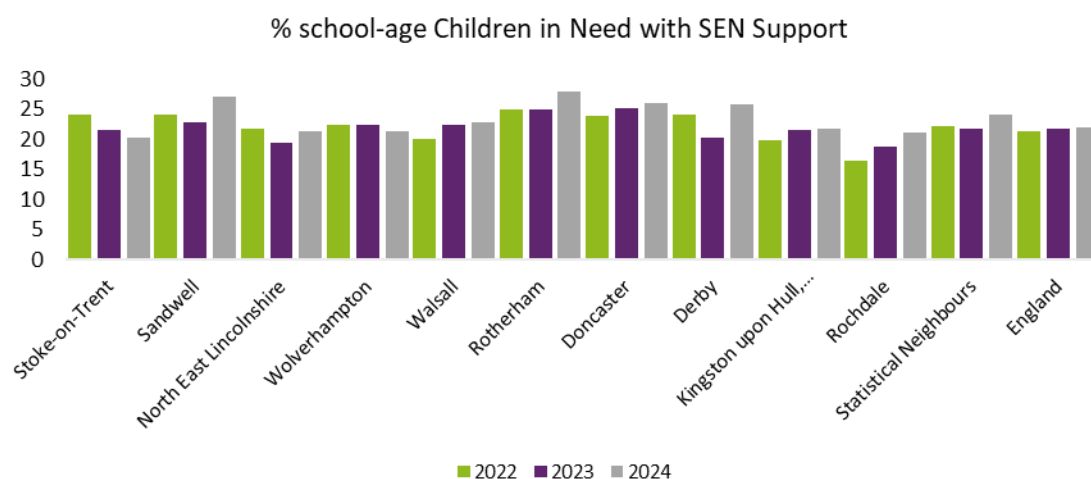
SEND – EHCPs and SEN Tribunals



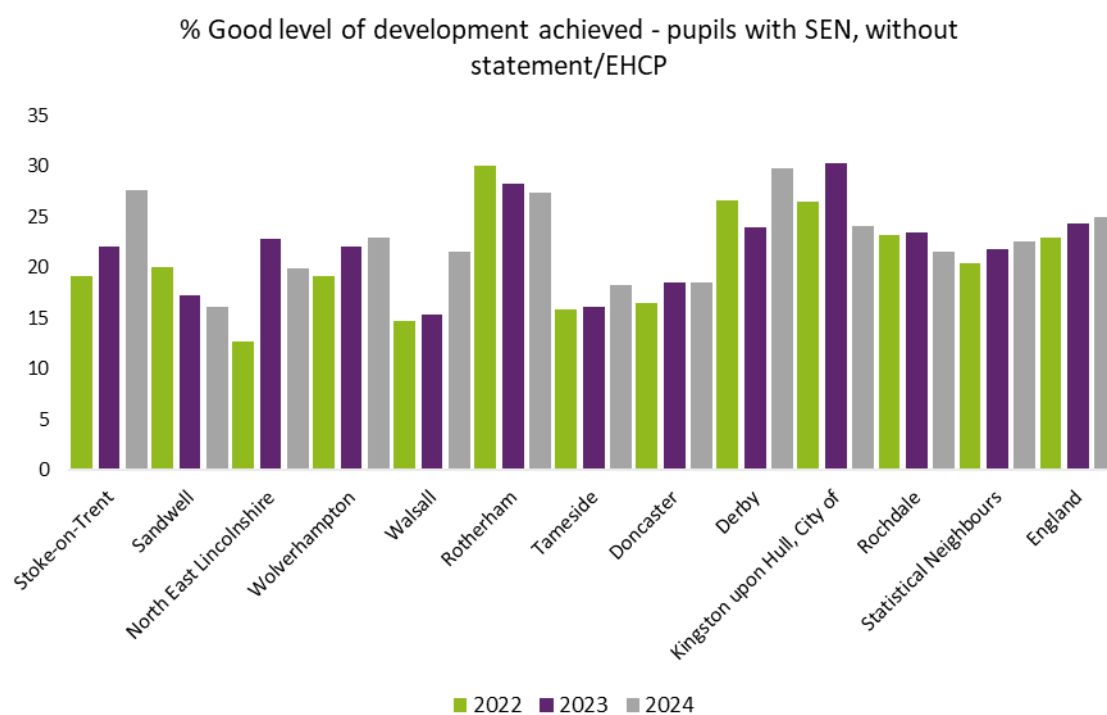


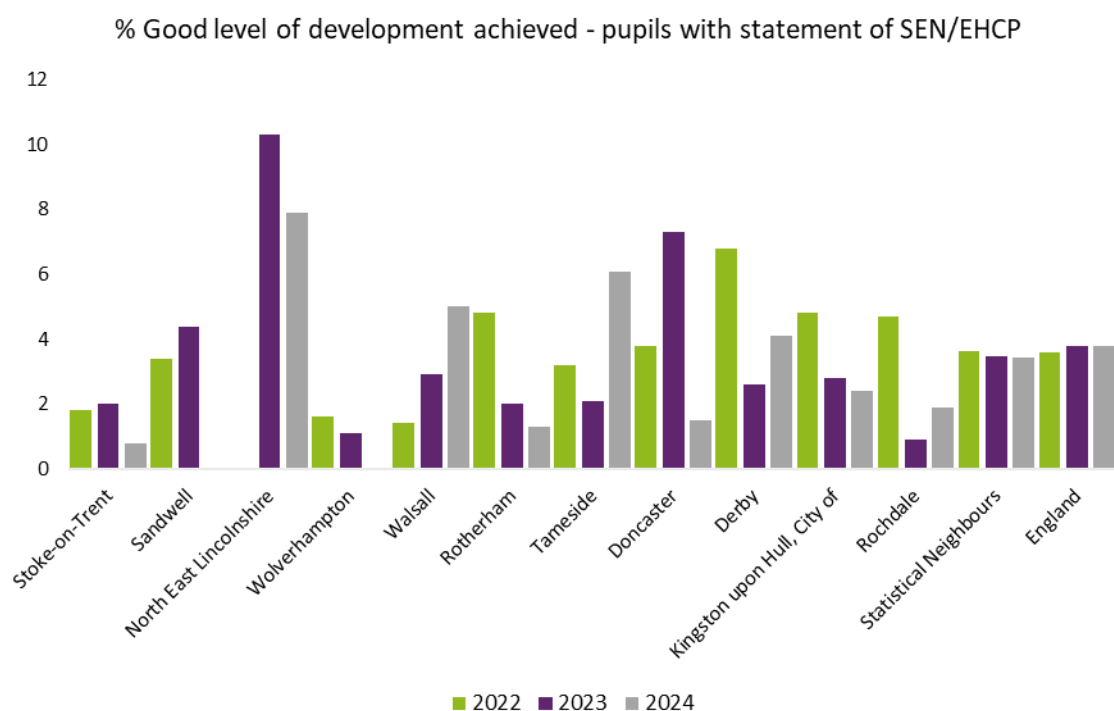
SEND – EHCPs and SEN support – CiN and LAC





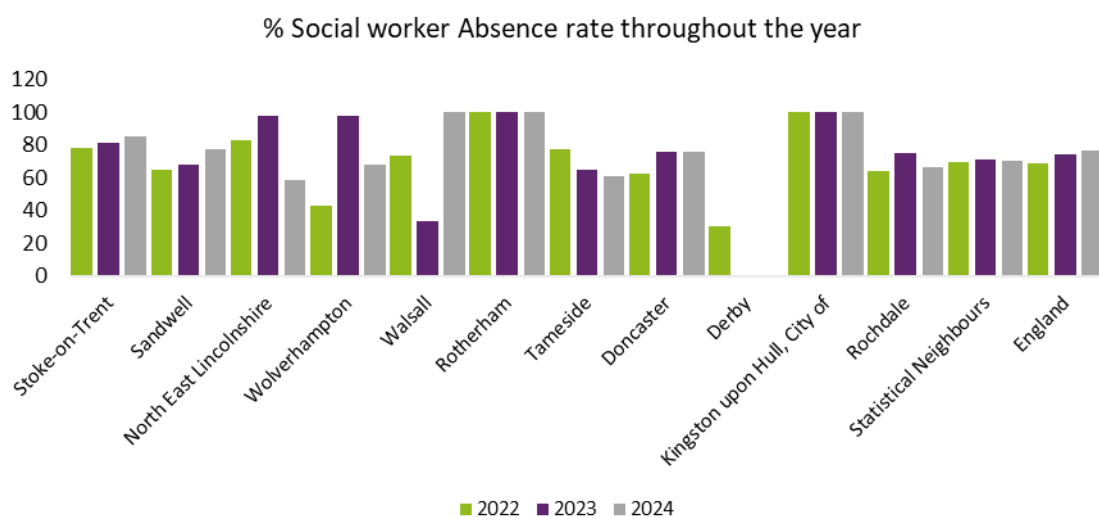
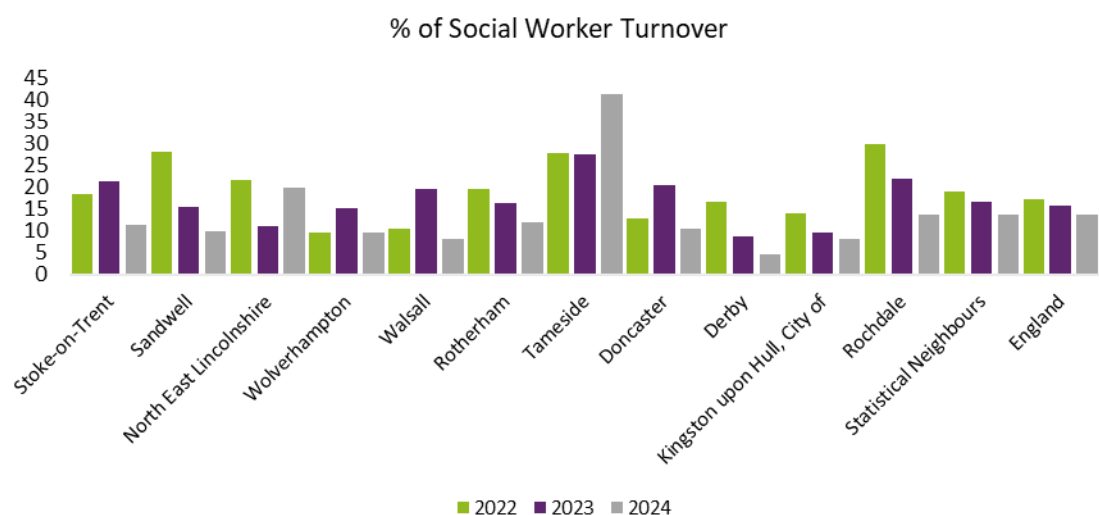
Foundation stages



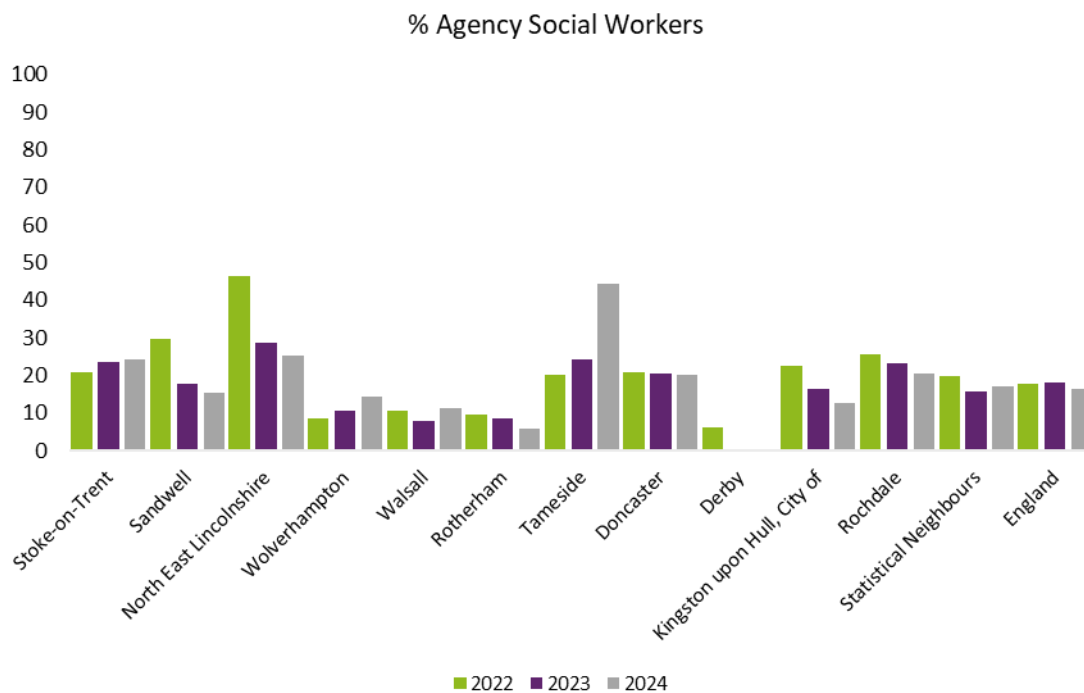
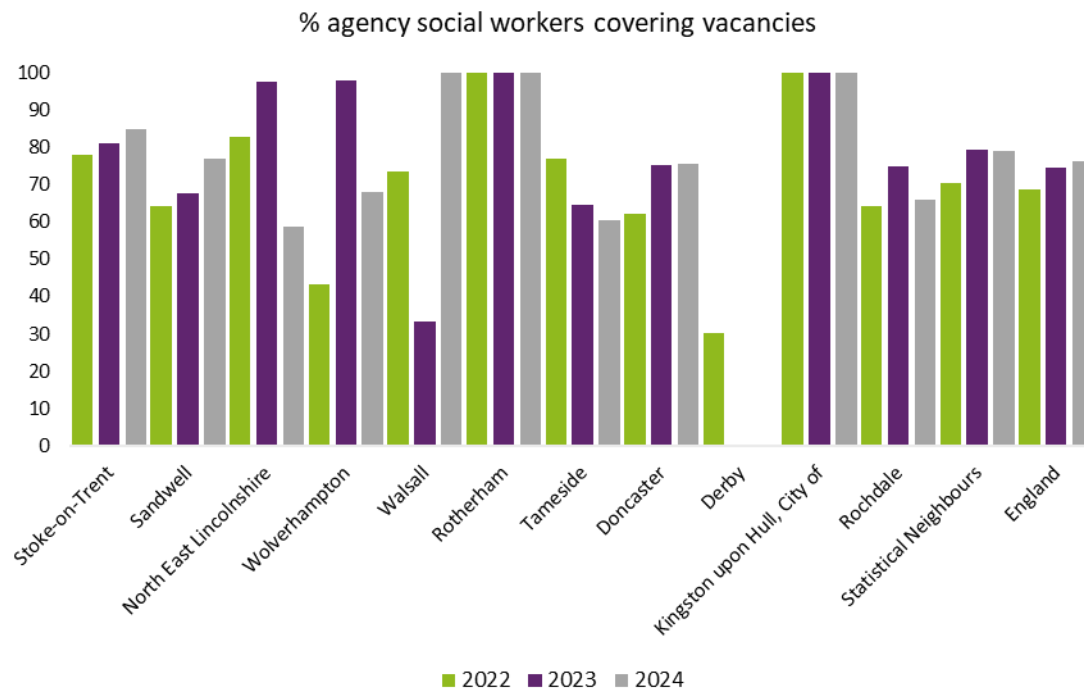


Children's Workforce part 1



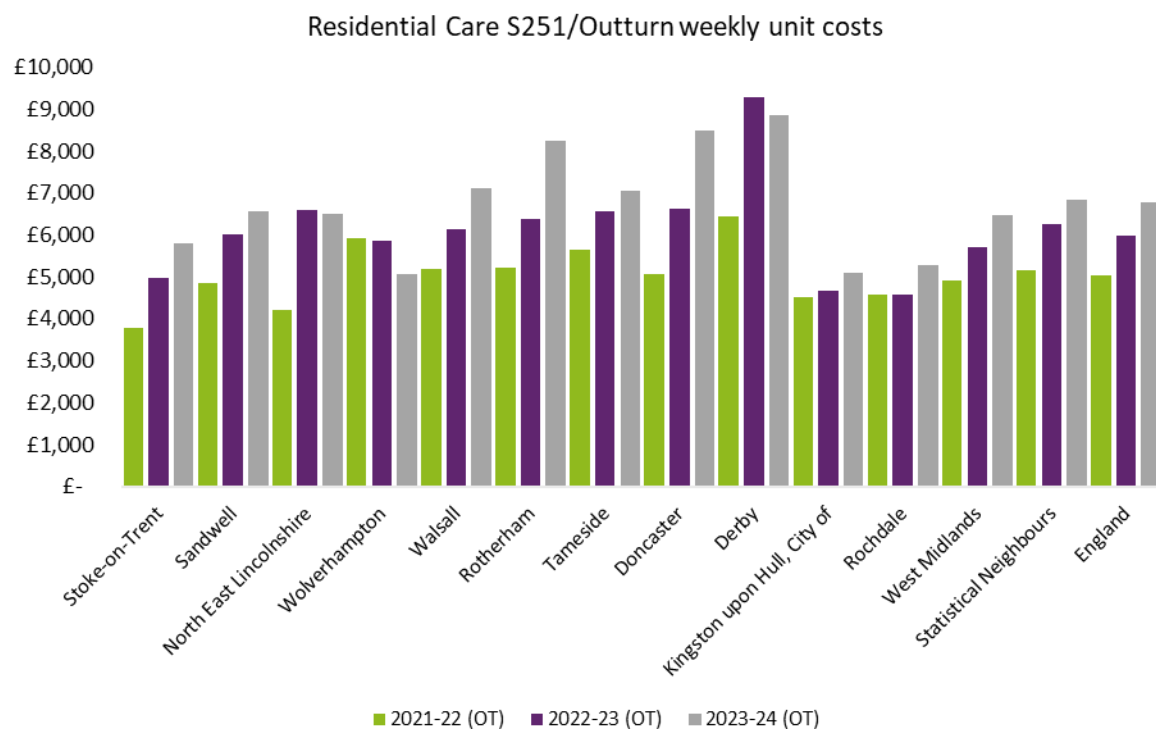
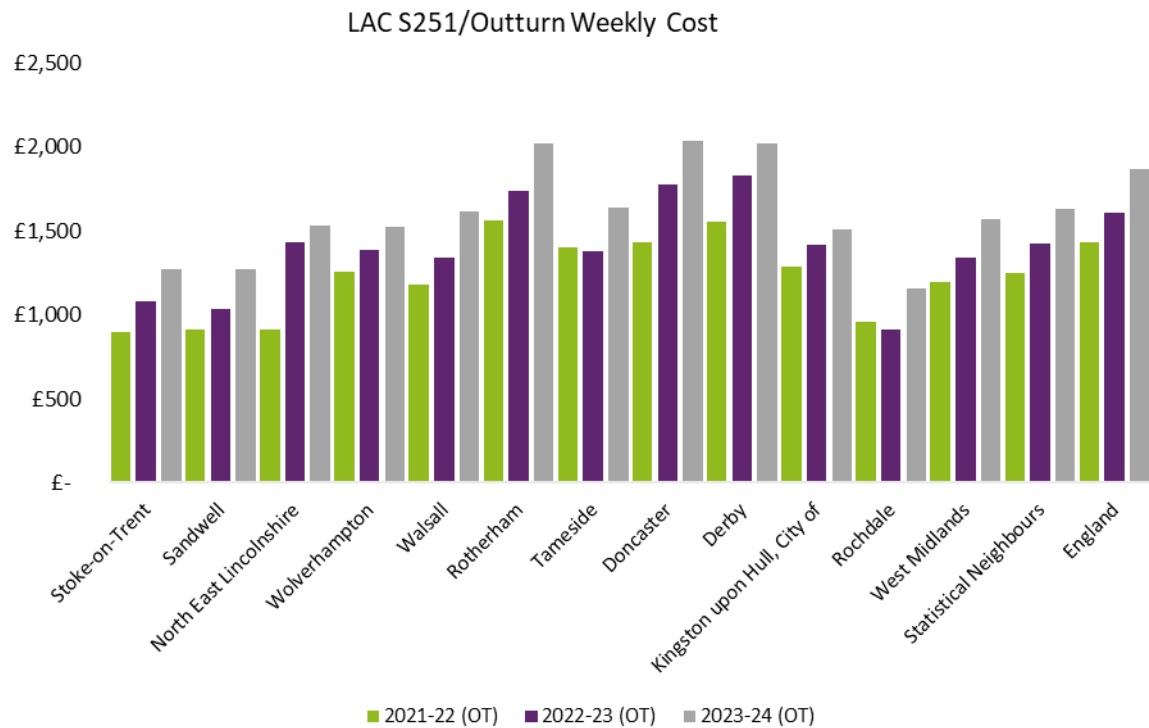


Children's Workforce part 2



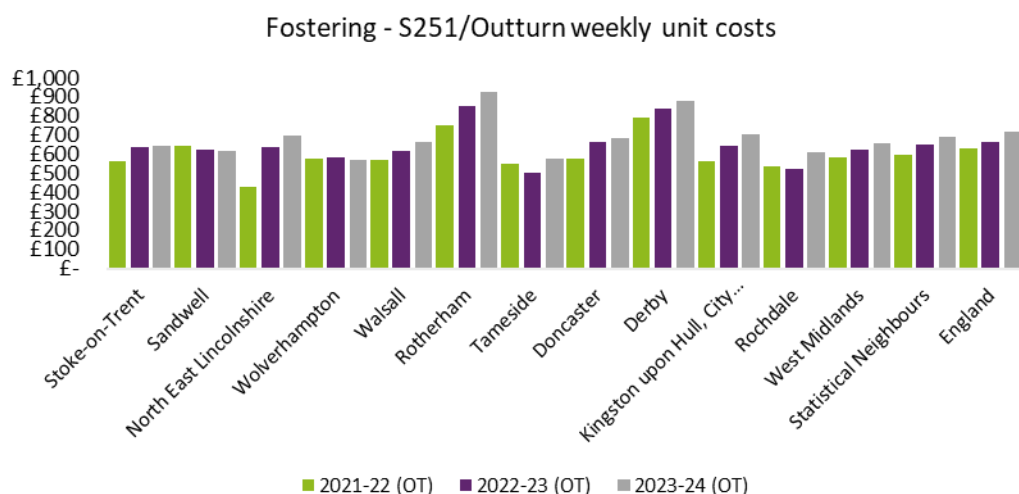
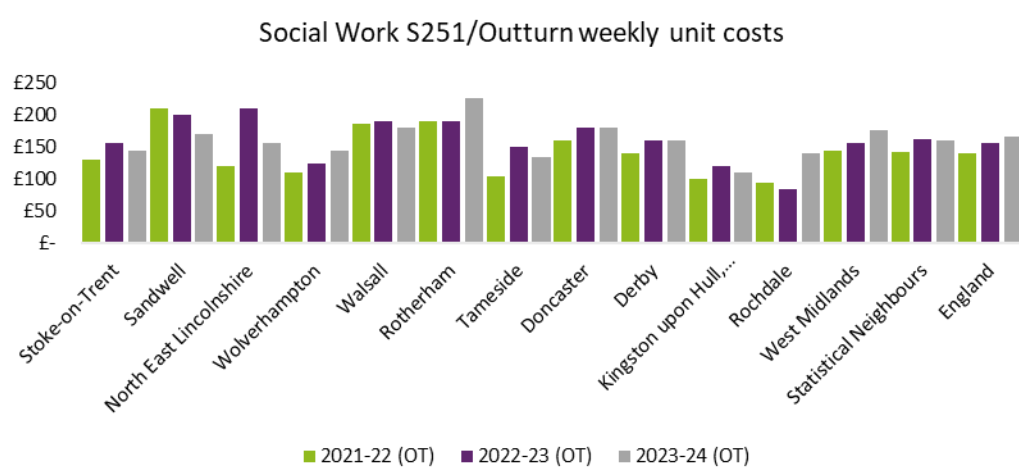
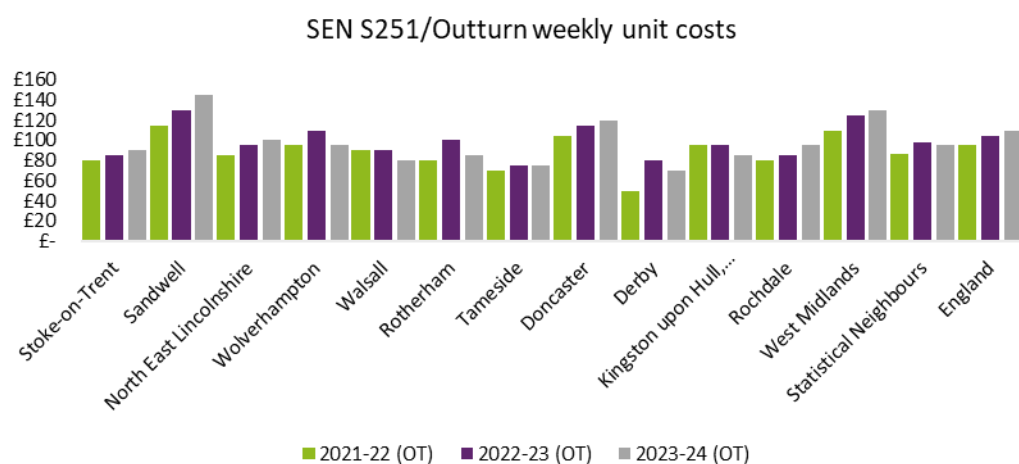
Note: % agency social workers covering vacancies - % above 100 are accurate reporting figures

Finance – average weekly costs



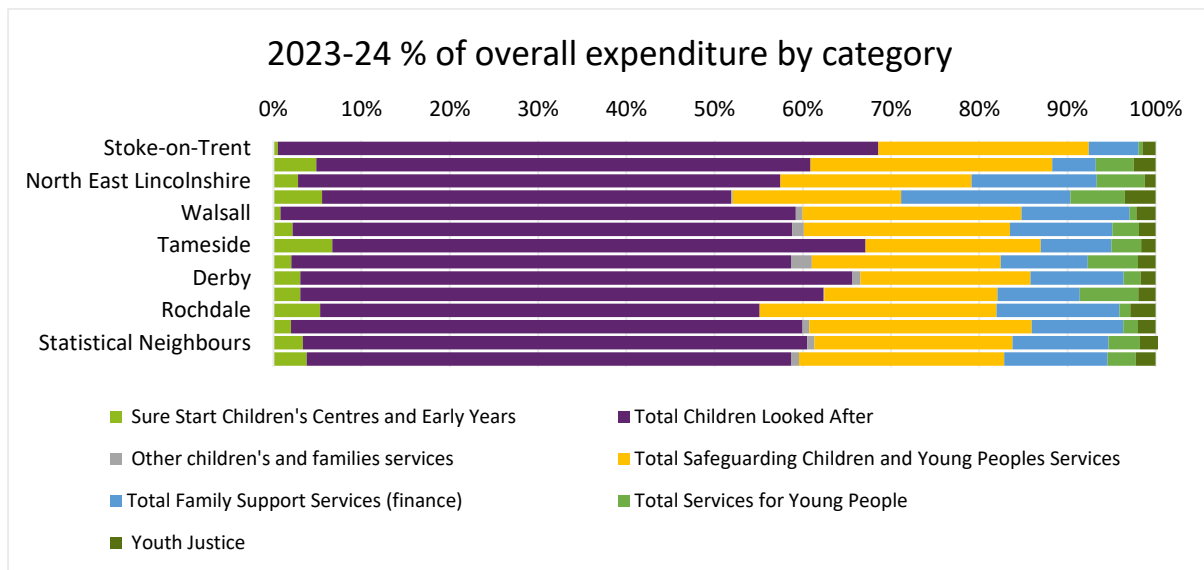
- LAC weekly unit costs are low and considerably lower than both statistical neighbours and England average. This is supported by lower residential and fostering rates

Finance – average weekly unit costs

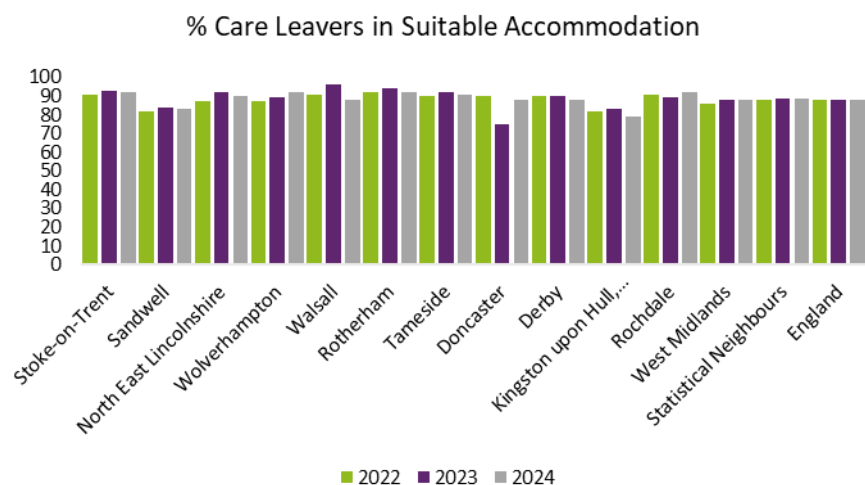
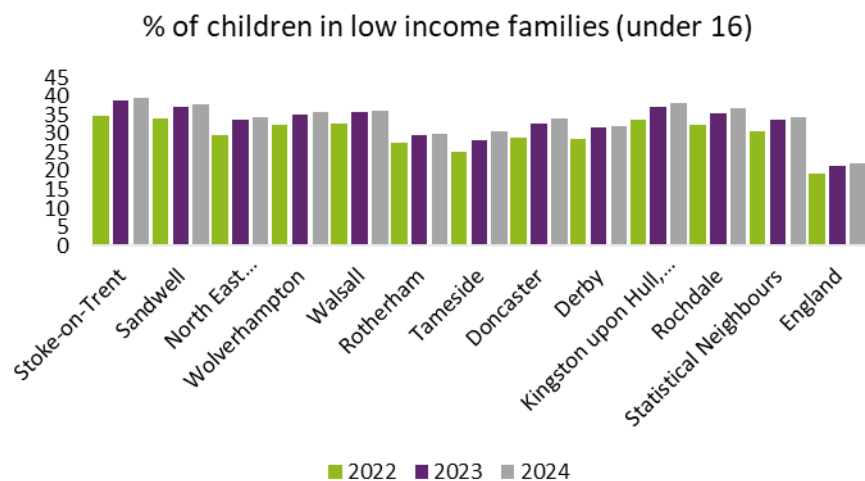


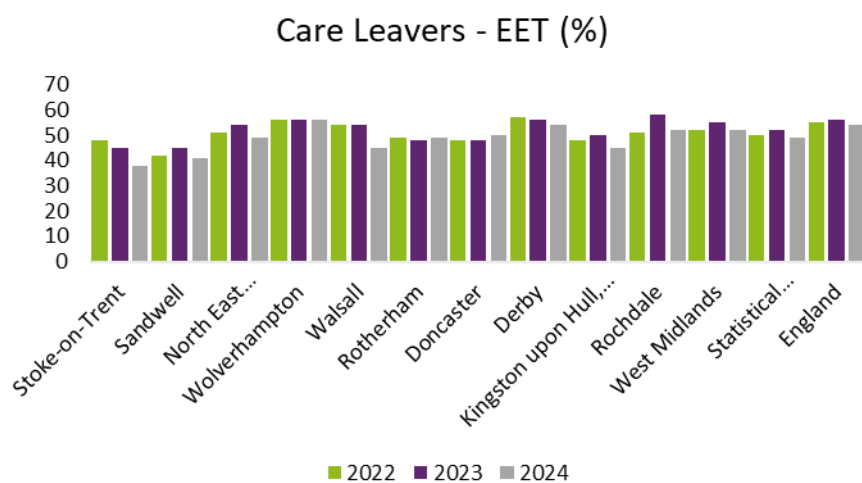
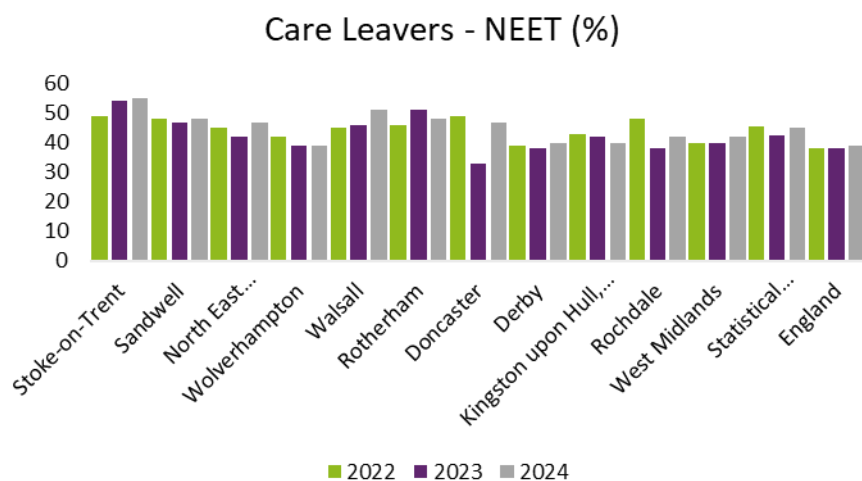
- SEN weekly outturn costs are in line with statistical neighbours.

Finance – Budget and expenditure



Wider Context

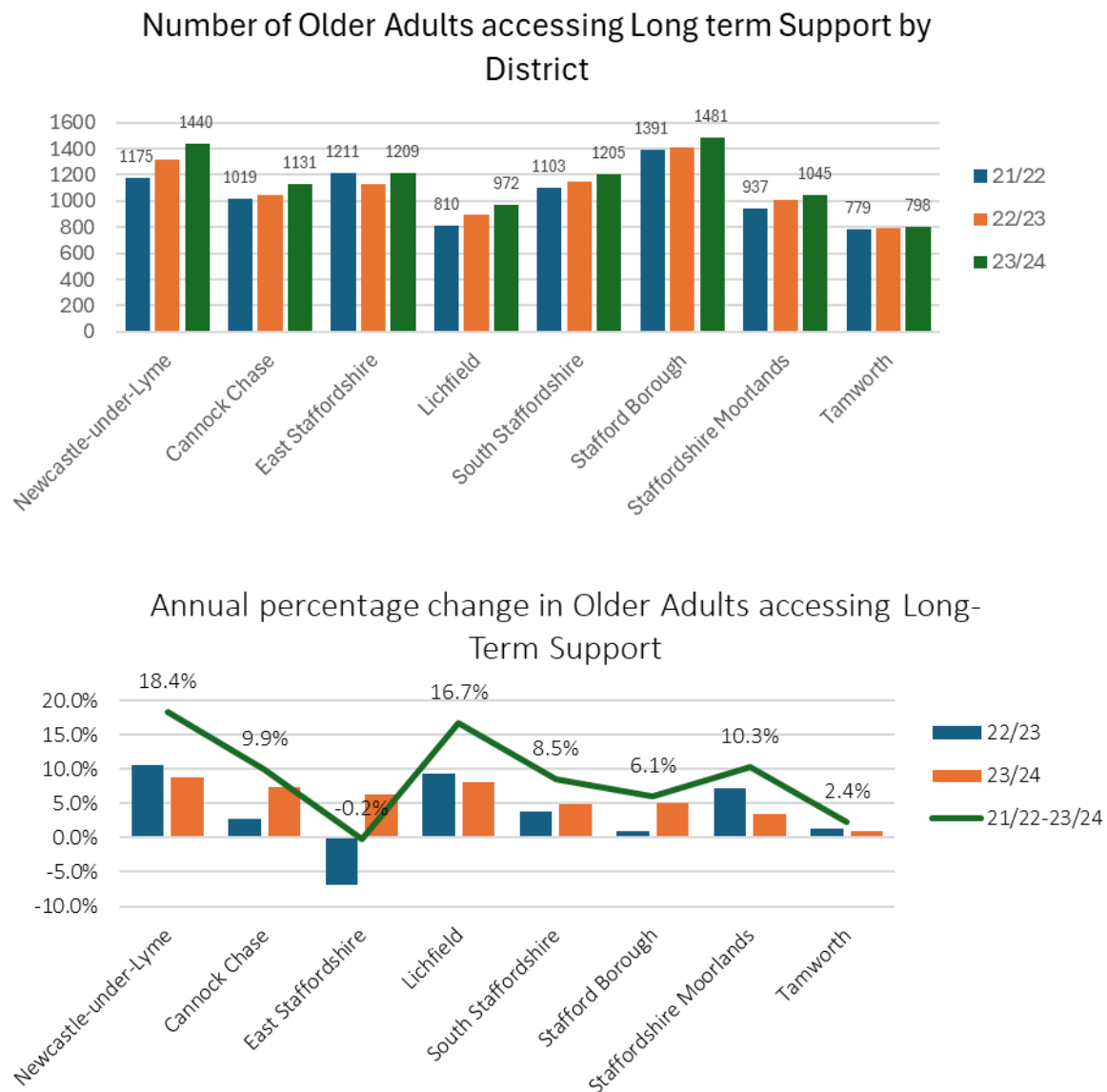




Adults social care

Adult social care demand – Staffordshire districts and boroughs

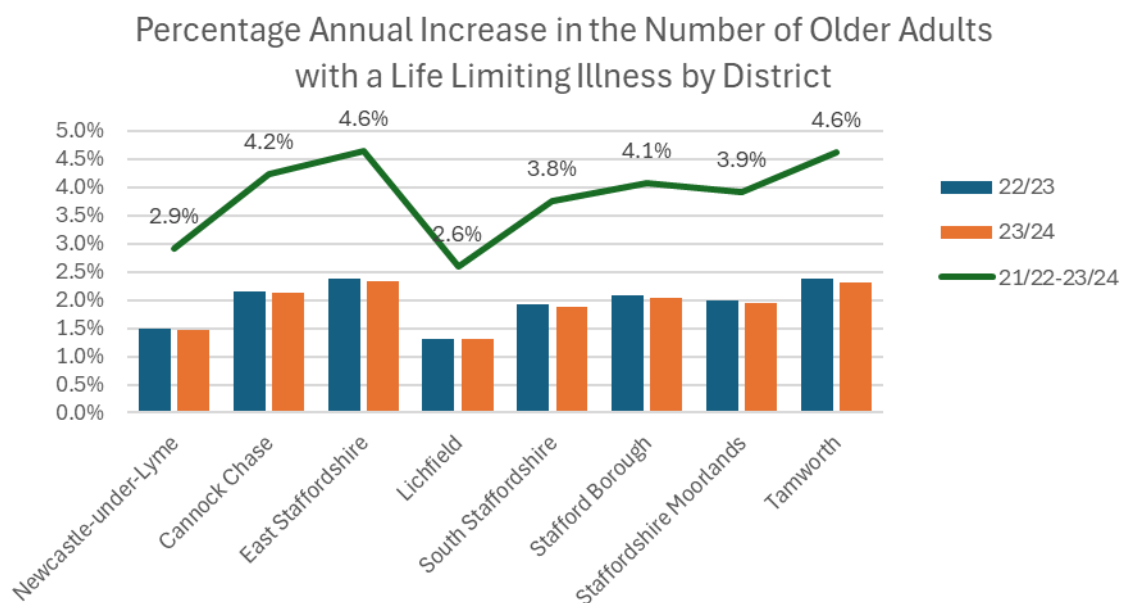
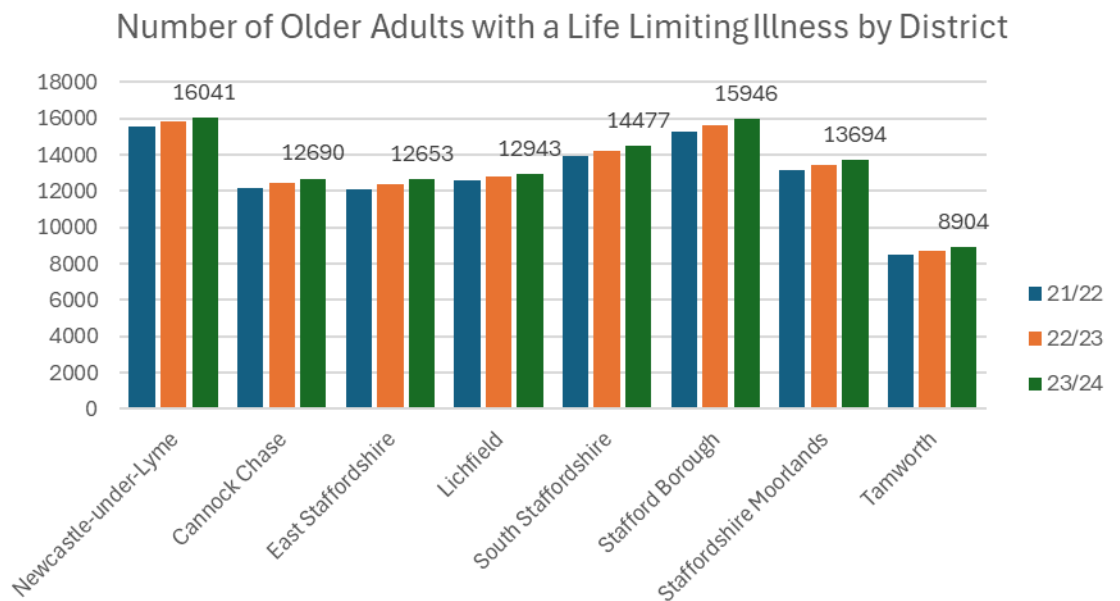
The Number of Older Adults (65+) accessing Long-Term Support



- In 2021/22 Newcastle-under-Lyme had **the second largest number of Older Adults accessing long-term support with 1175.**
- This rose **by 265 to 1440 in 2023/24**, with NULBC remaining the second highest district in terms of older adults ASC demand, **second to Stafford Borough Council where 1481** adults were accessing long-term support.
- Newcastle-under-Lyme experienced the **highest increase in Older Adults long-term support demand** out of any of the Staffordshire Districts. With the largest district by overall demand, Stafford, experiencing a much slower increase.

- There was an **18.4% rise between 2021/22 and 2023/24** reporting, the highest of any district across the two years.
- Furthermore, Newcastle-under-Lyme experienced the **highest single year increases** in the proportion of OAs accessing long-term support with a **10.5% rise** from 2021/22 to 22/23 and 23/24 a rise of **8.8%**.

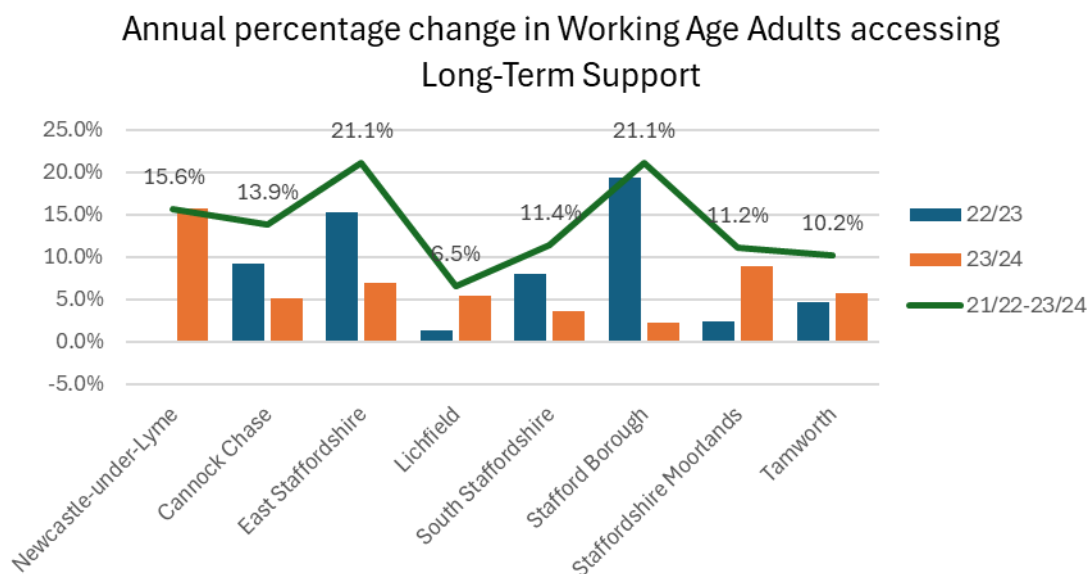
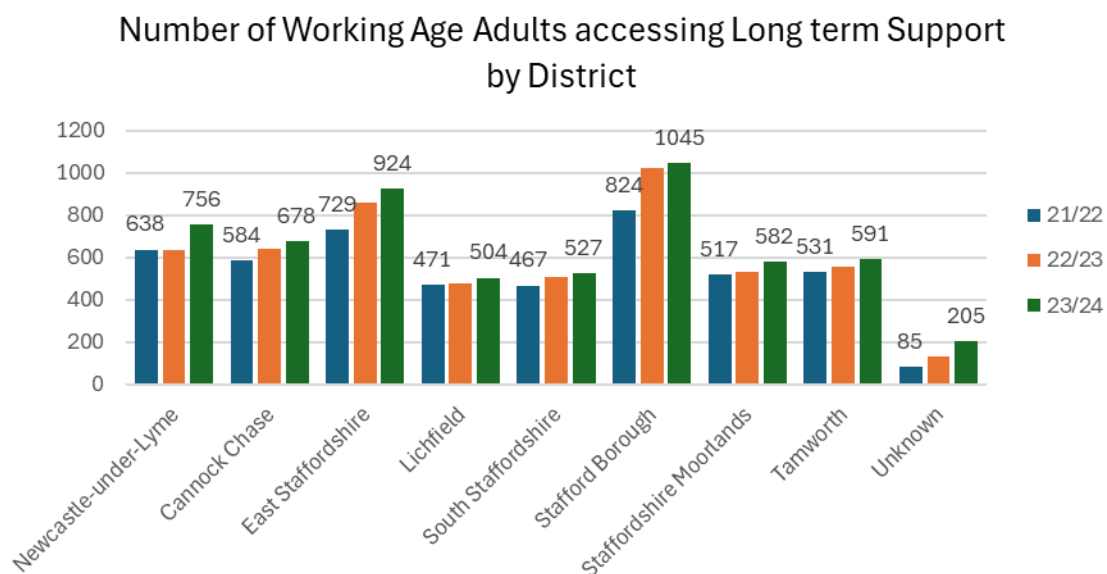
Prevalence of Life Limiting Illness in the Older Adult (65+) population



- In 2021/22 Newcastle-under-Lyme had **the highest number of Oldest Adults with a life limiting illness**, with 15,573 within the district, out of the Staffordshire Districts. By 2023/24 Newcastle-under-Lyme remained the highest district council by number of older adults who have a **life limiting illness with 16,041**.

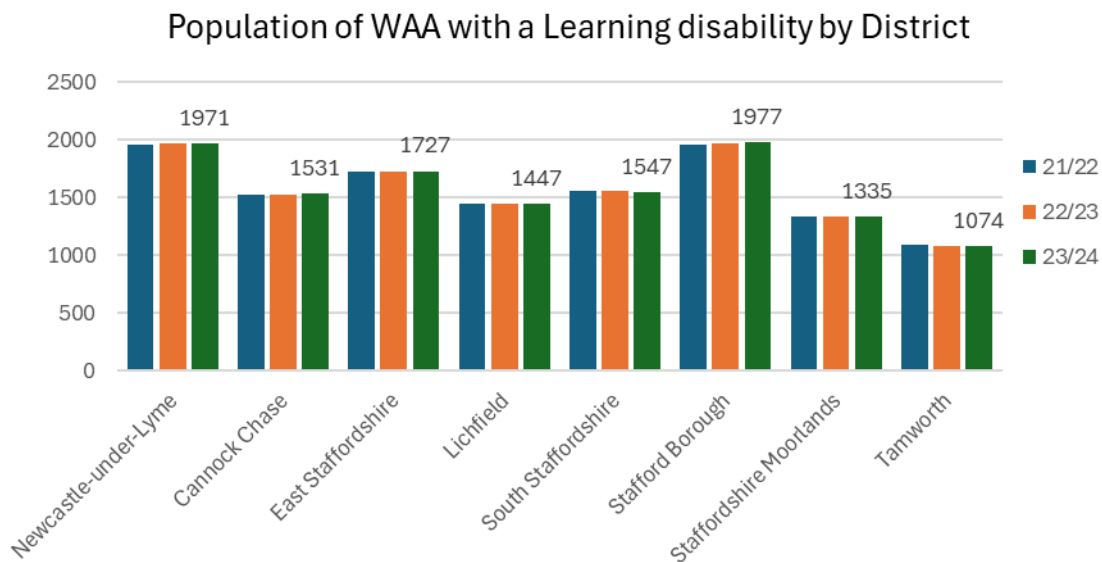
- The number of adults in 2023/24 with a life limiting illness in Newcastle-under-Lyme was **95 higher than the next district** Stafford, despite Stafford's larger older adult population. This suggests there is **both a higher concentration and absolute number** of older adults with life limiting illnesses in the district, which will be a pressure on the Adult social care system that is unique to Newcastle-under-Lyme.
- The rate of increase in Newcastle-under-Lyme was **slower than the average of Staffordshire districts (3.8%)** with an increase of 2.9% experienced between the financial year ends of 21/22 and 23/24.

The Number of Working Age Adults (18-64) accessing Long-Term Support



- The number of Working Age Adults who accessed long-term support in Newcastle-under-Lyme in **2021/22 was 638**, this rose to **756 in 23/24** where Newcastle was the **third highest district by overall WAA demand**, below East Staffordshire (924) and Stafford (1045).
- The rate of increase experienced in Newcastle-under-Lyme was the **highest single year increase of any district between 2022/23 and 2023/24 with a rise of 15.7%**, however the 2-year increase trend is less significant with East Staffordshire and Stafford experiencing higher 2-year increases. However, these are a result of large spikes in demand in 2022/23 which then decreased in the following year.
- This suggests that working age adult demand while **increasingly a pressure** within Newcastle-under-Lyme, especially in the most recent reporting period, **is more in line with other districts, than older adults**.

Population of Working Age Adults (18-64) with a learning disability



Percentage Annual Increase of the Population of WAA with a Learning disability by District

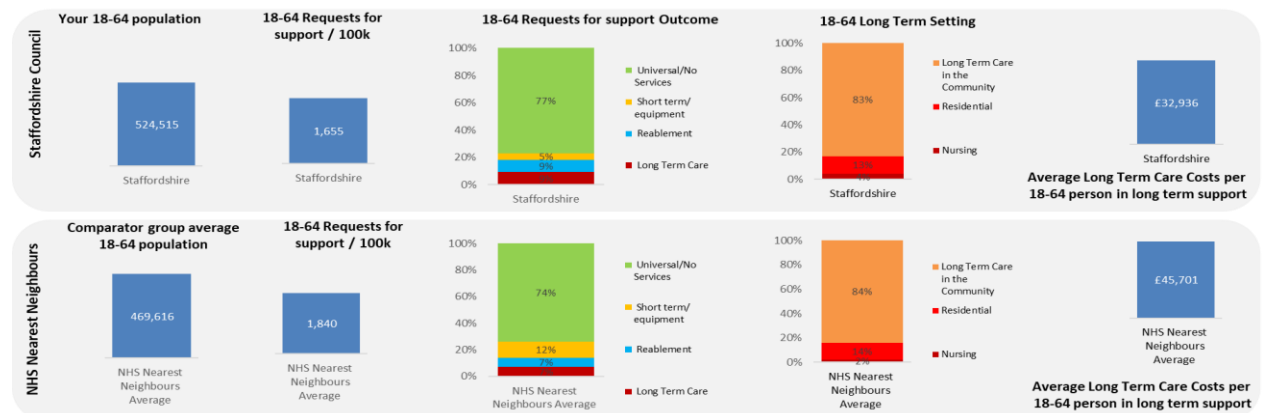


- The number of working age adults with a learning disability rose from **1962 in 2021/22 to 1971 in 2023/24** in Newcastle-under-Lyme. With the district the **second highest in terms of number of working age adults with a learning disability** with only Stafford (1977) having a greater population – however as Stafford has 5000 more working age adults overall, this would suggest there is a **higher concentration of the working age adult population in Newcastle-under-Lyme having a learning disability**.
- The rate at which this has increased was higher than the Staffordshire average of (+0.1%) over the 2-year reporting period, with an increase of 0.5%, with only Cannock Chase and Stafford districts experiencing a higher increase of 0.8%.
- While overall numbers of working age adults were mostly consistent across Staffordshire, Newcastle-under-Lyme represents an area where the prevalence of Learning Disabilities are high, which may indicate a unique pressure on the ASC system.

Adult social care – Staffordshire

How does your system manage demand?

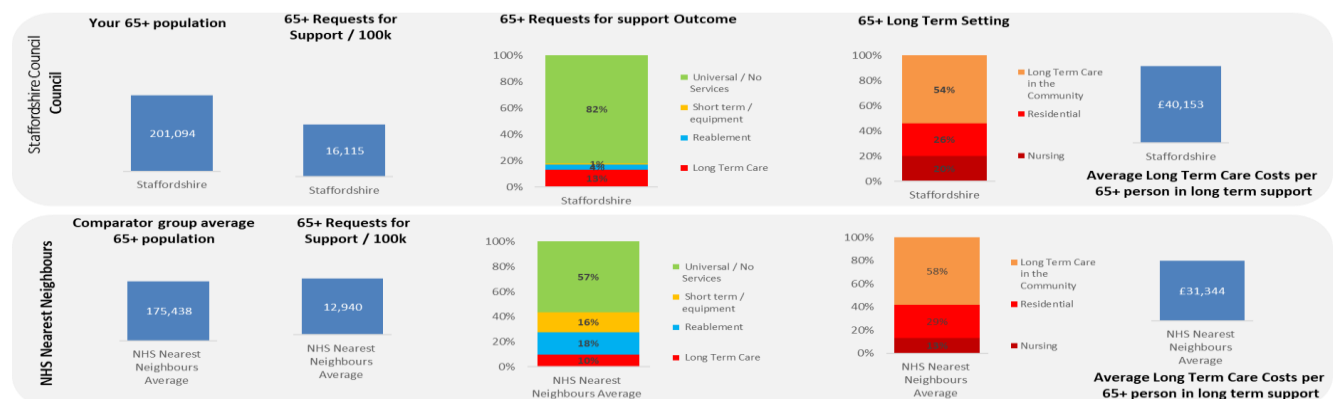
Working age adults (18-64)



- Average long term care costs per person per annum are much less than NHS Nearest Neighbours (NHS Statistical Neighbours). It is also unusual that the average long term care cost for 18-64 is below older adults in Staffs case £32,936 versus £40,153.

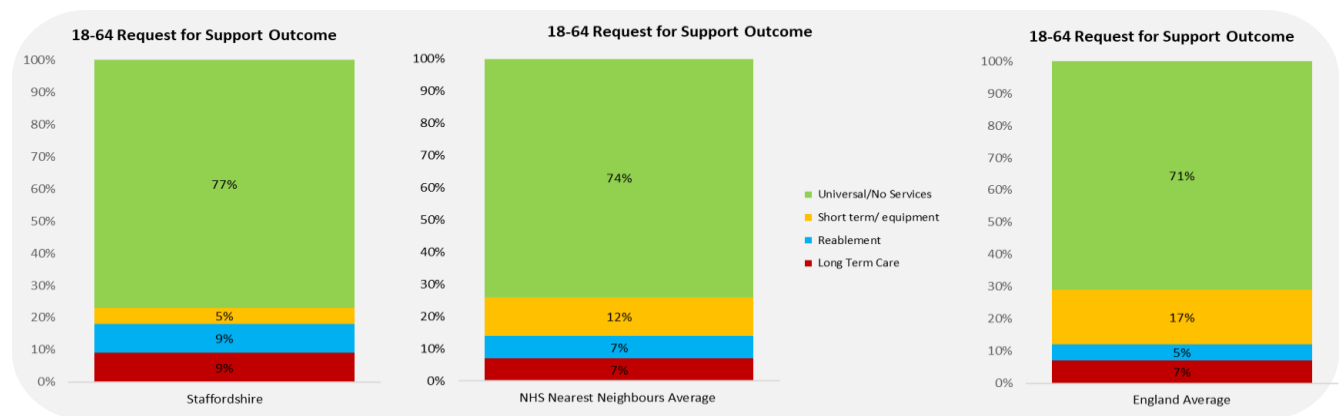
How does your system manage demand?

Older adults (65+)

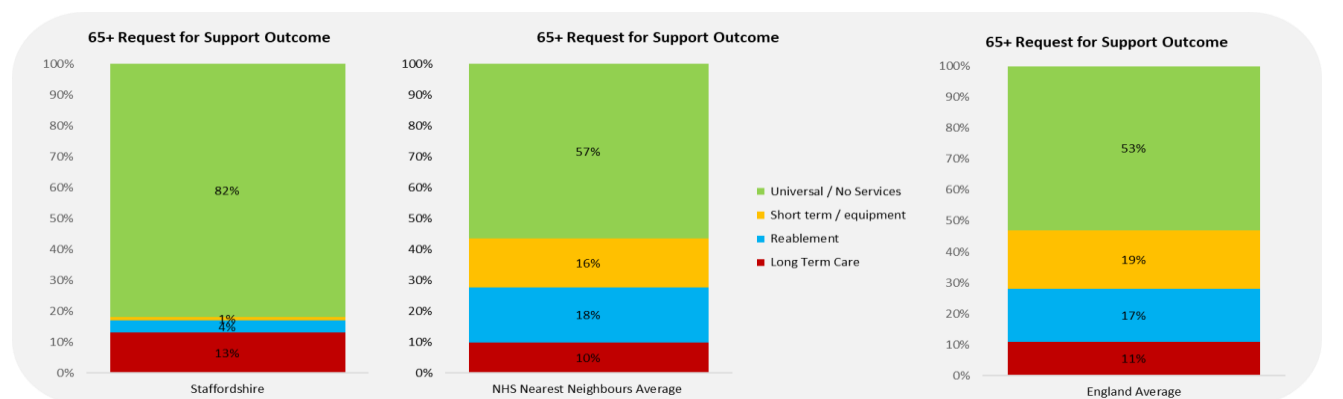


- Average spend on long term care for older adults is much higher than NHS Nearest Neighbours (NHS statistical neighbours)

Assessment Outcome for 18-64

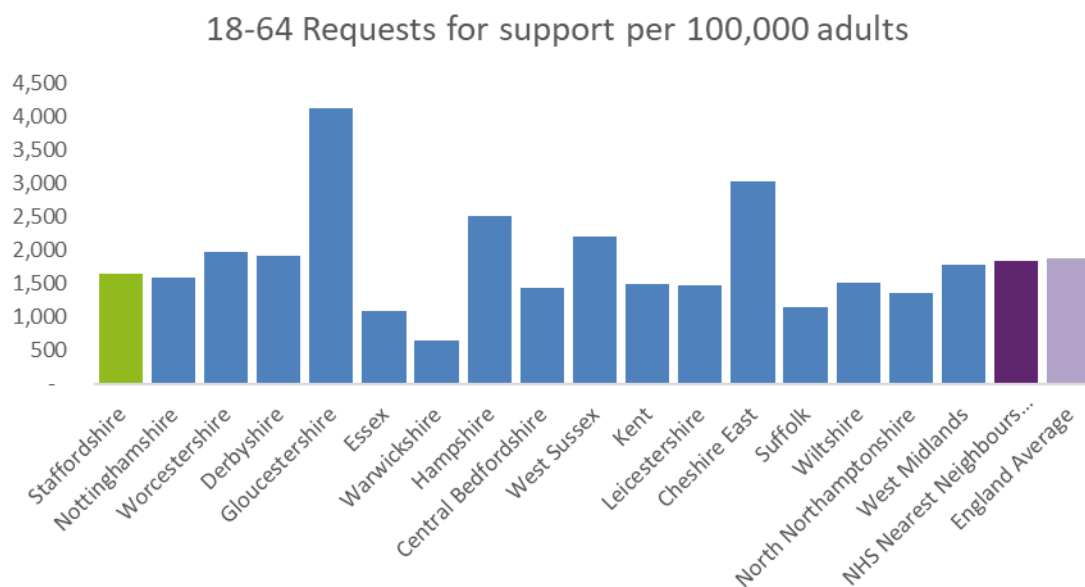


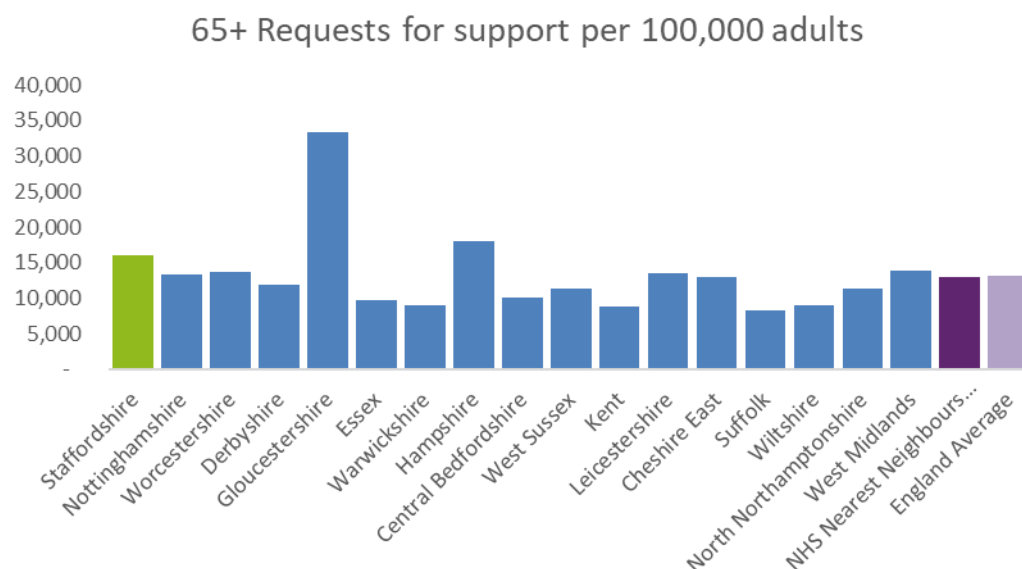
Assessment Outcome for 65+



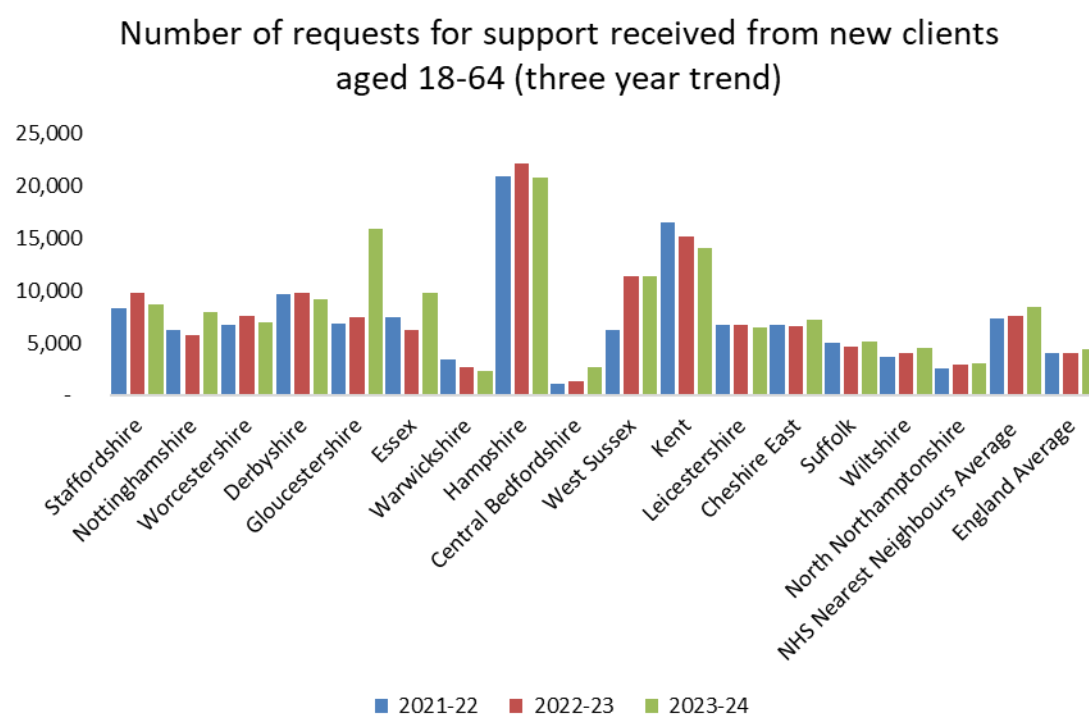
Percentages may not total 100% due to return in some categories of <5 not counted in total figures

Requests for Support per 100,000 adults

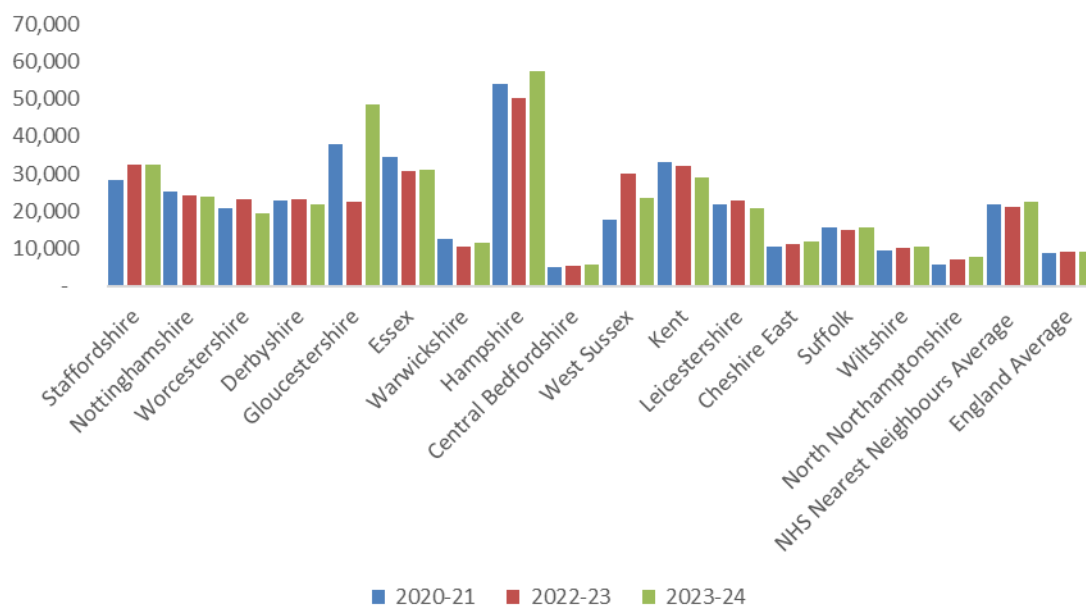




Requests for Support

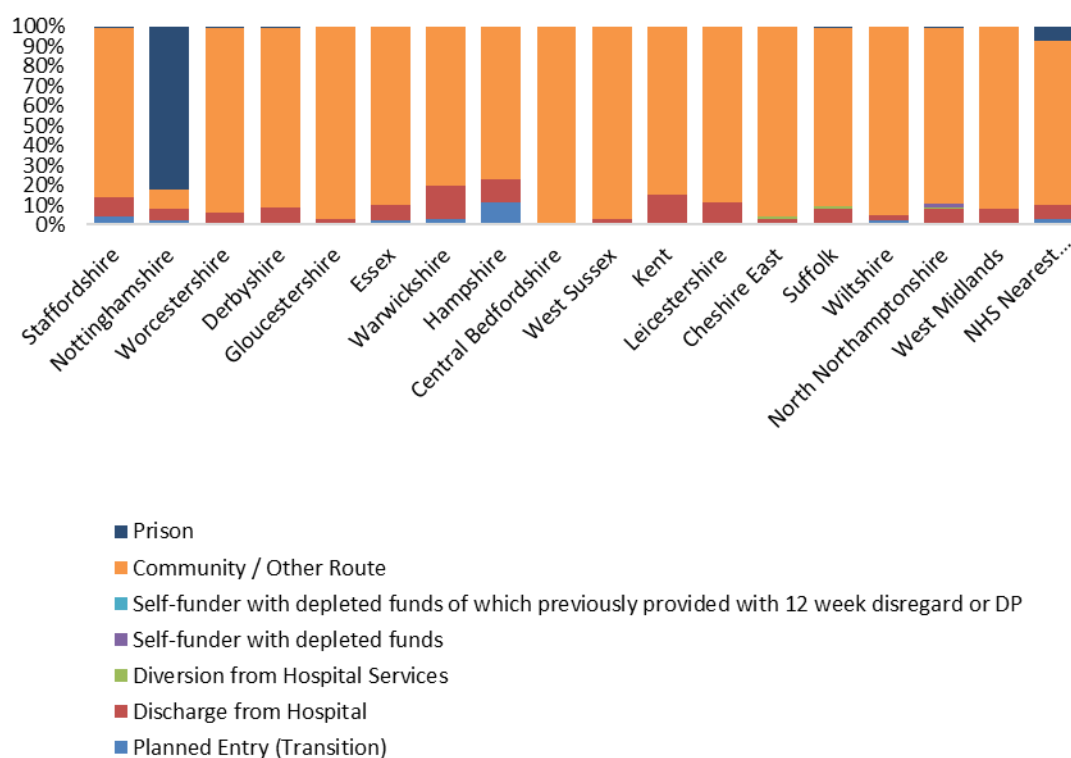


Number of requests for support received from new clients aged 65 and over (three year trend)

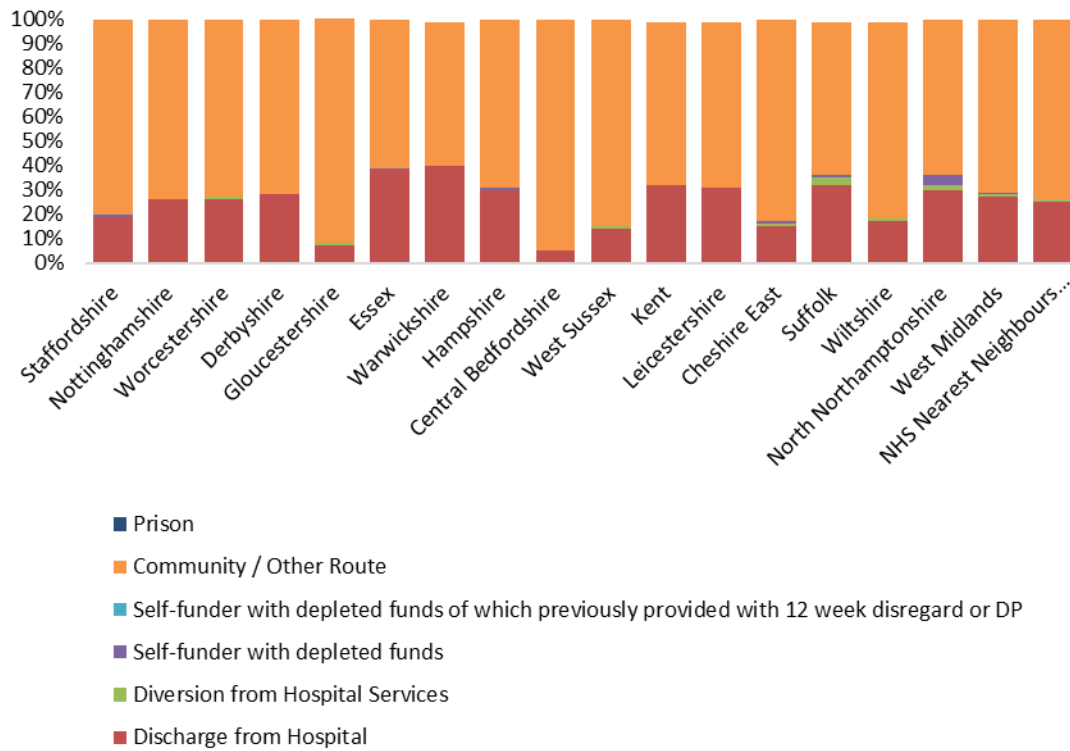


Source of referral

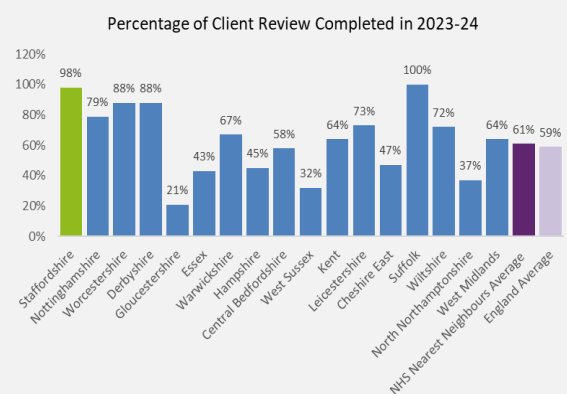
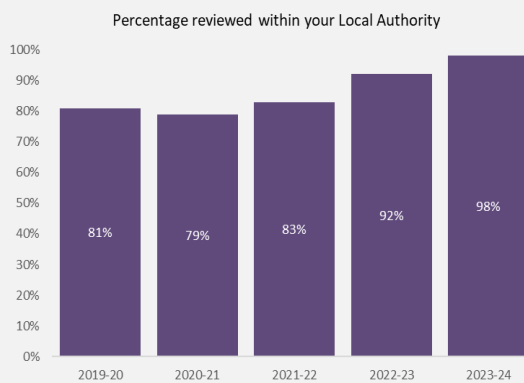
18-64 Source of Referral %



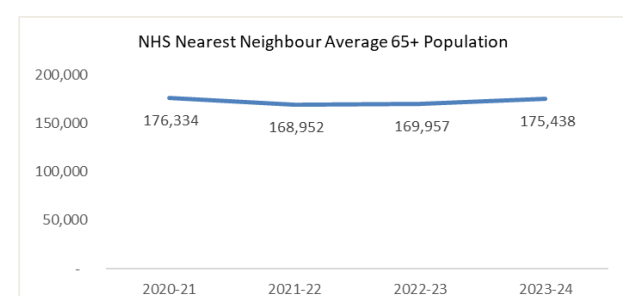
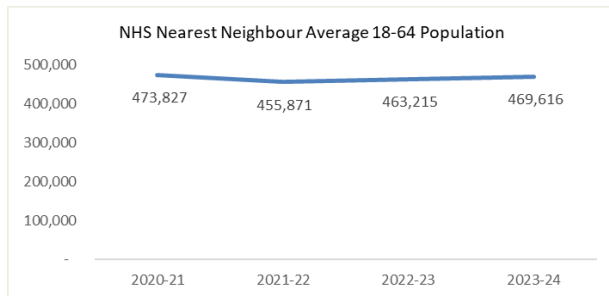
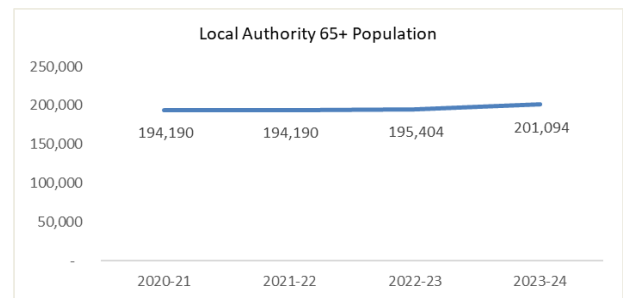
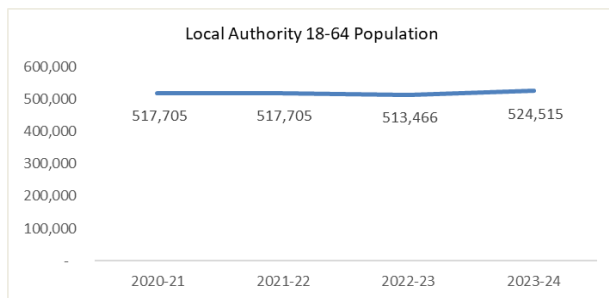
65+ Source of Referral %



Review Effectiveness

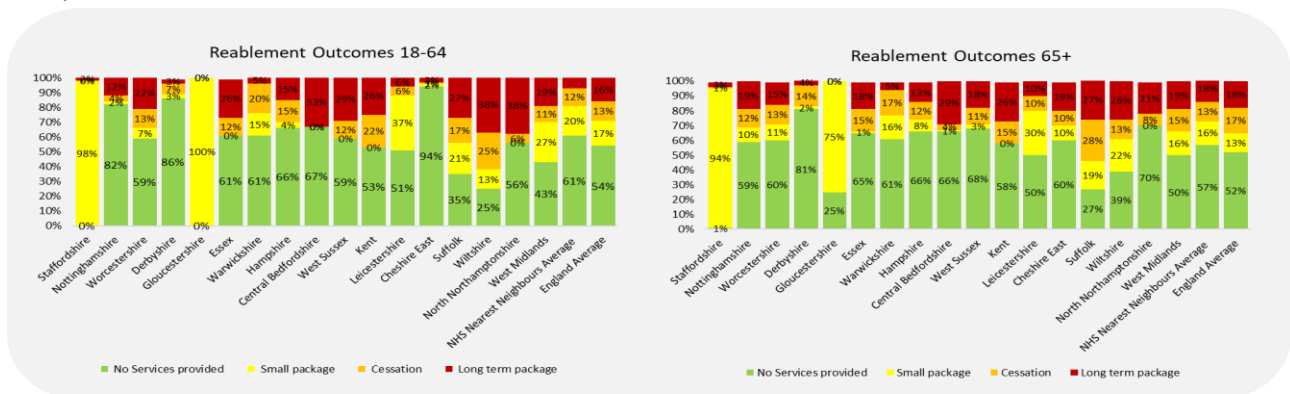


Population



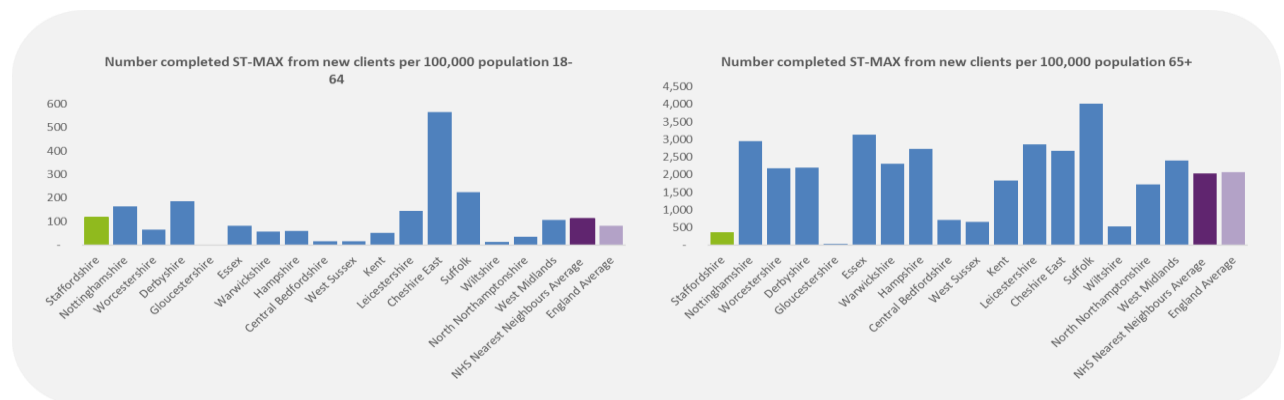
Reablement Effectiveness

Completed ST-MAX

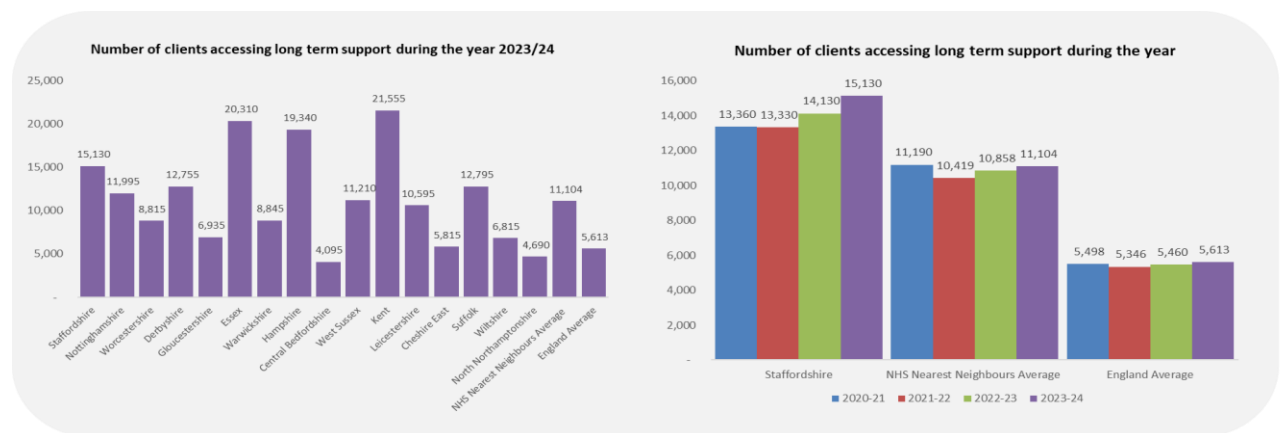


- The above would indicate an issue with Staff CC recording

Completed ST-MAX

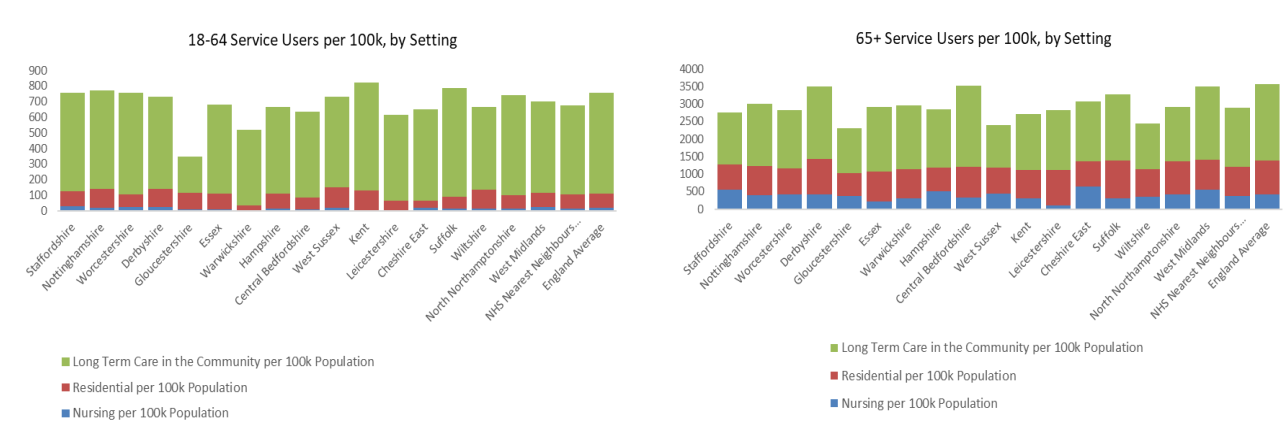


Number accessing long term support during the year

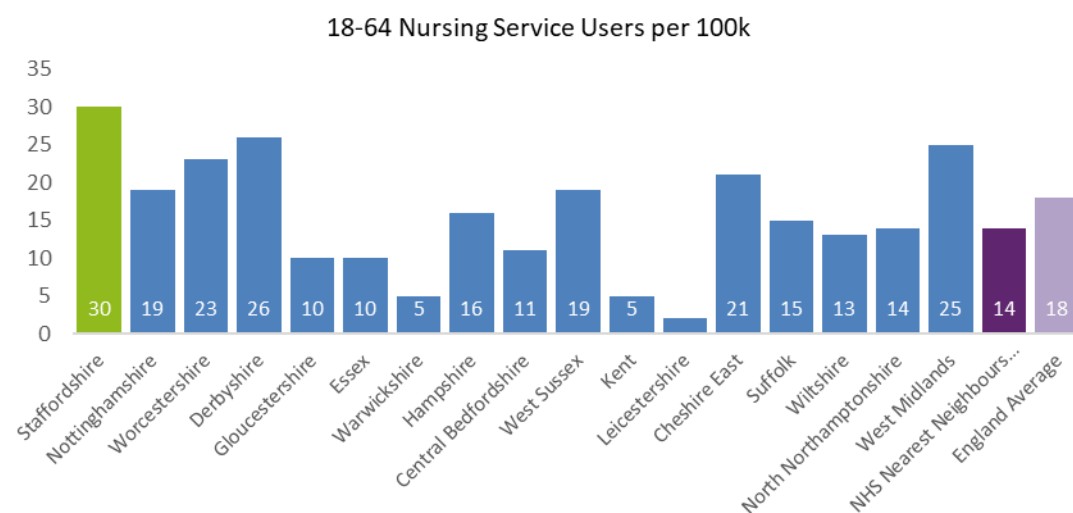
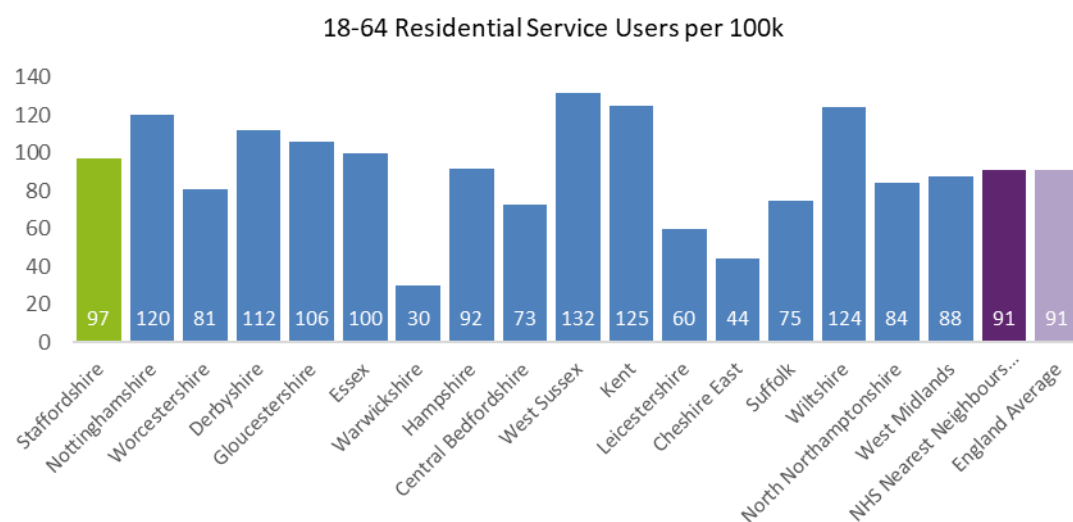
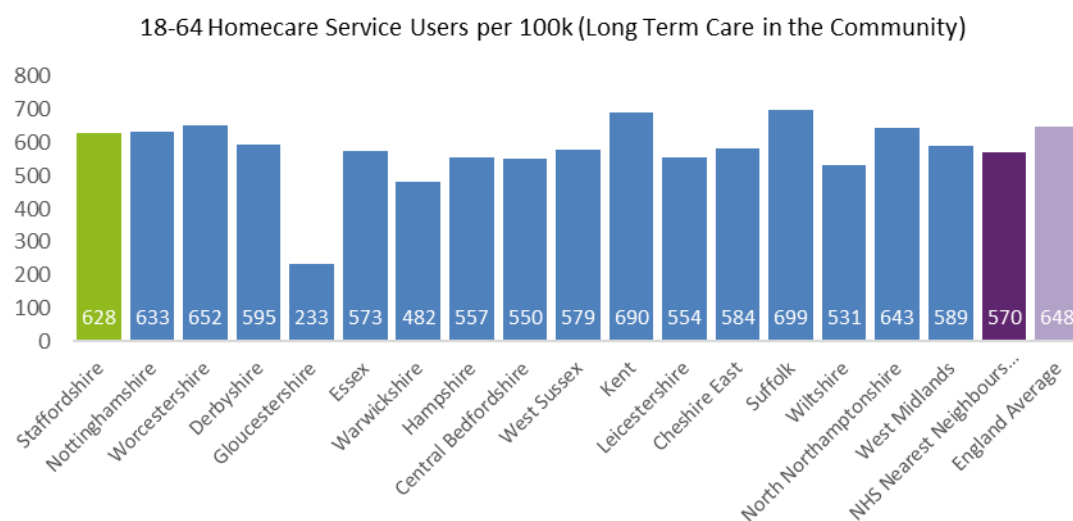


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Service Users by Setting / 100k

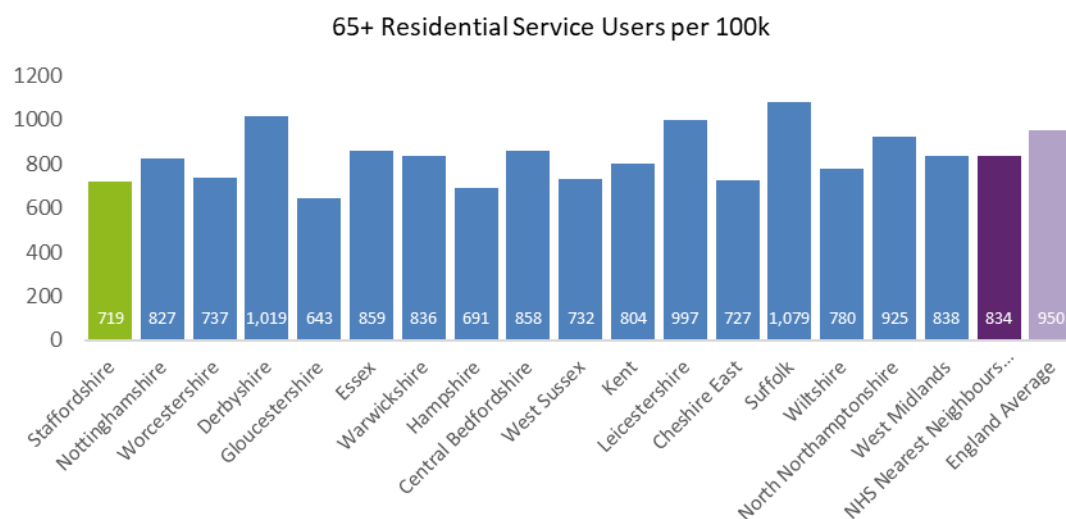
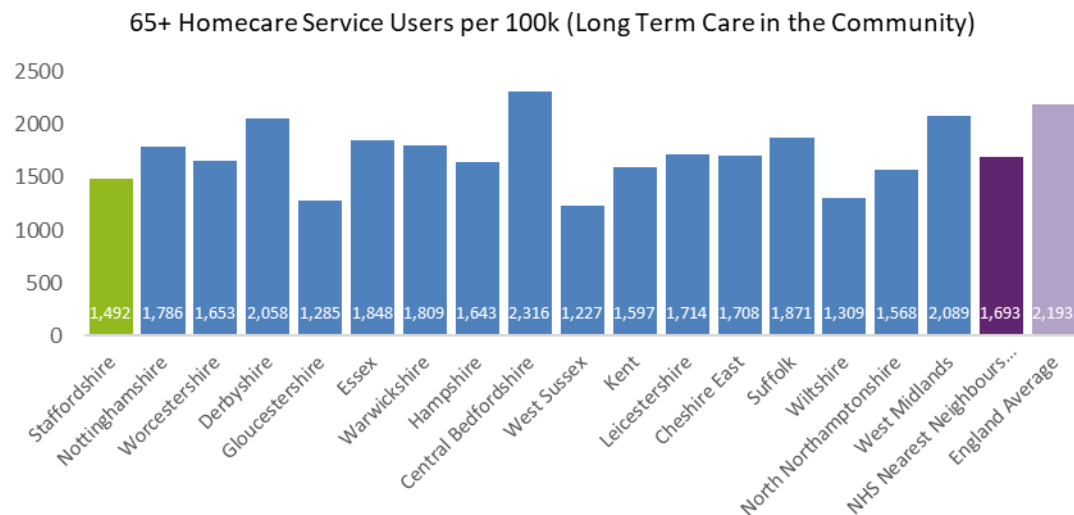


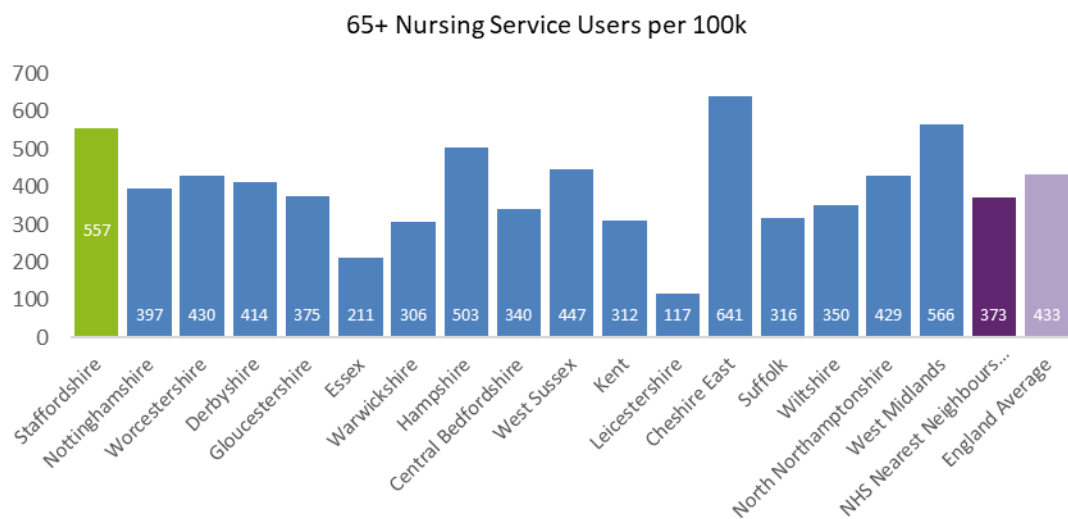
Number of 18-64 Adults in Long Term Care / 100k



- Higher use of homecare for working age adults compared to NHS statistical neighbours which is positive.
- Whilst Residential is slightly higher the use of nursing is higher, indicating too much of a dependency on bed based care

Number of 65+ Adults in Long Term Care / 100k



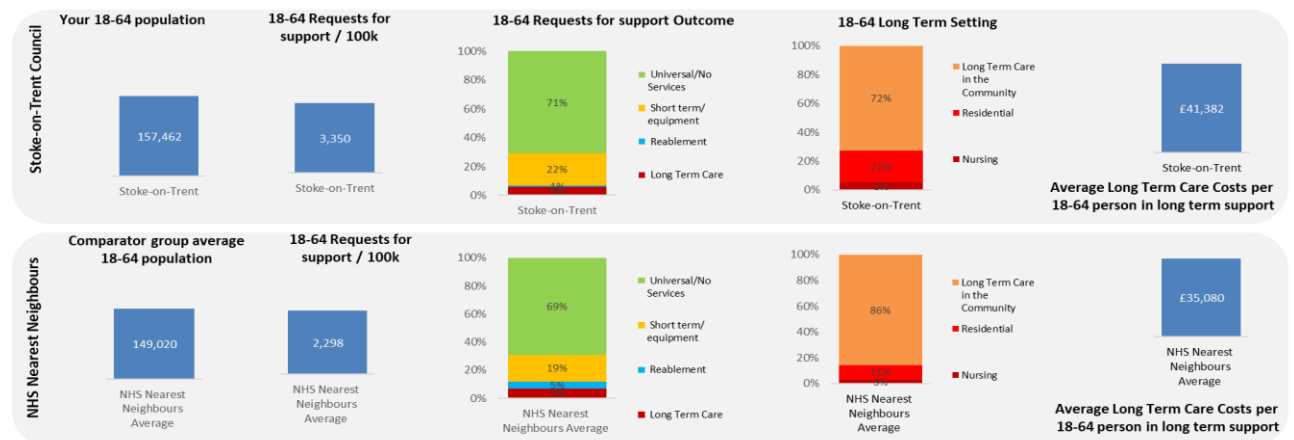


- Lower use of homecare for older age adults compared to statistical neighbours and whilst use of residential is lower the use of nursing is much higher than NHS statistical neighbours.

Adult social care – Stoke-on-Trent

How does your system manage demand?

Working age adults (18-64)

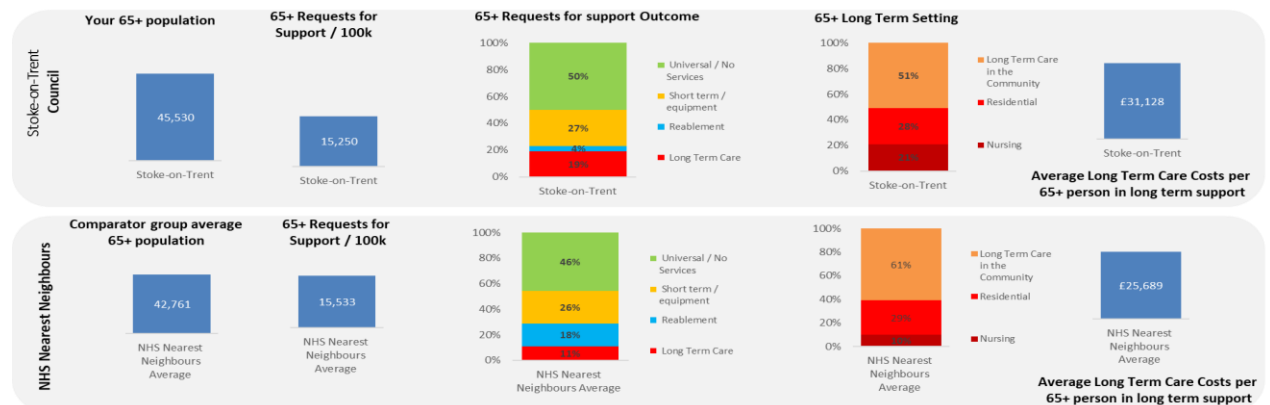


- Requests for support per 100k are above SNs.
- Average expenditure on long term care for working age adults is considerably above NHS SNs.

86

How does your system manage demand?

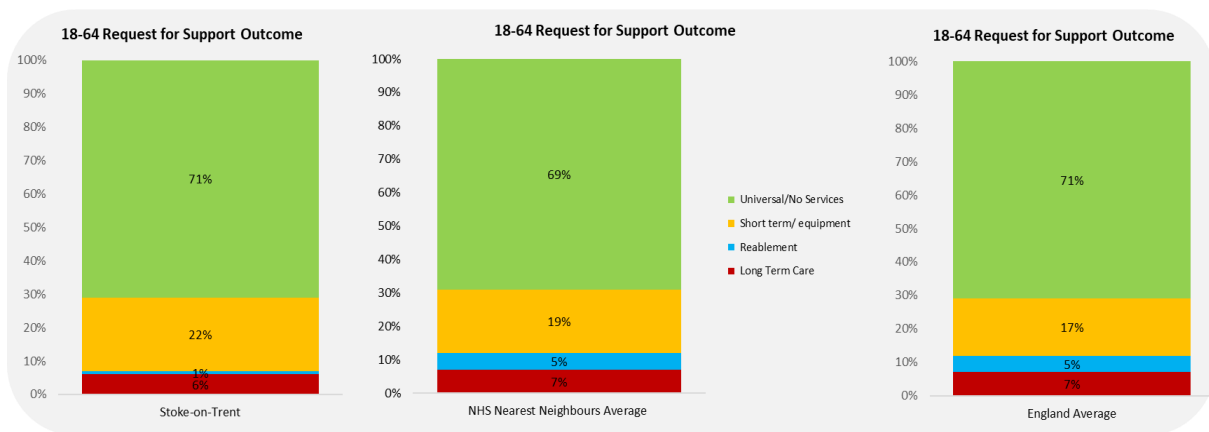
Older adults (65+)



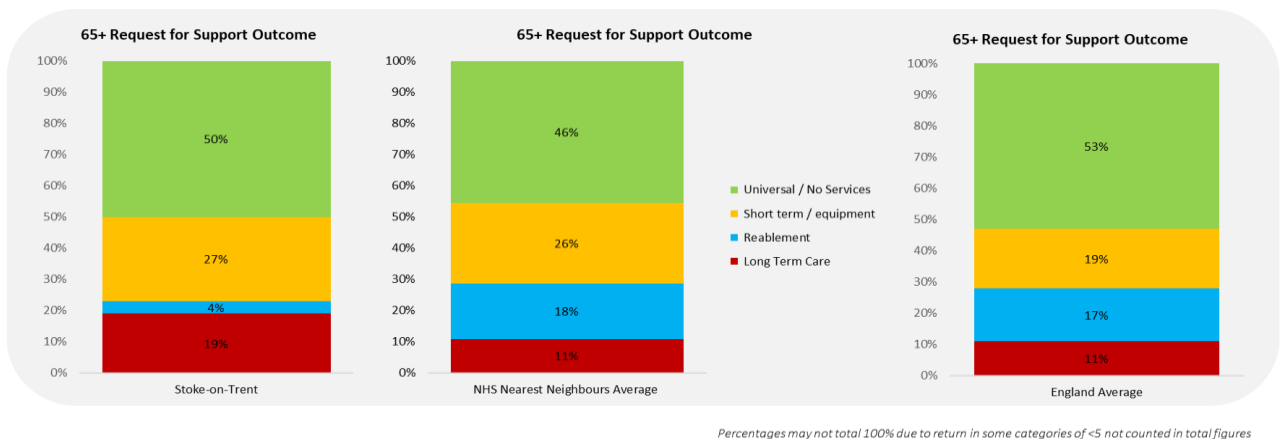
- Requests for support are in line with SNs.
- Average expenditure on Older adults again is well above NHS SNs.

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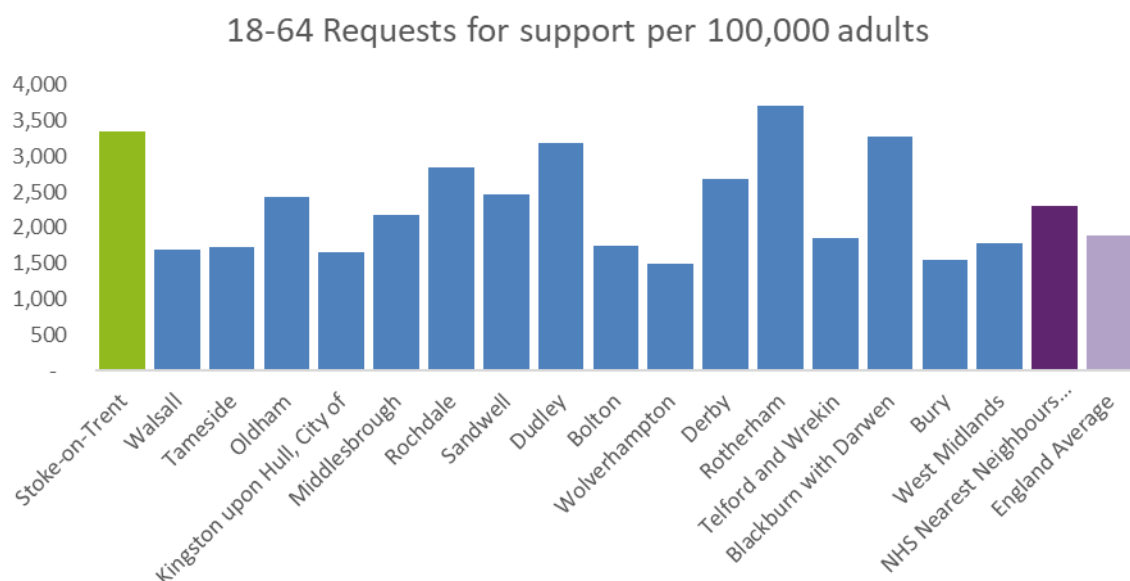
Assessment Outcome for 18-64

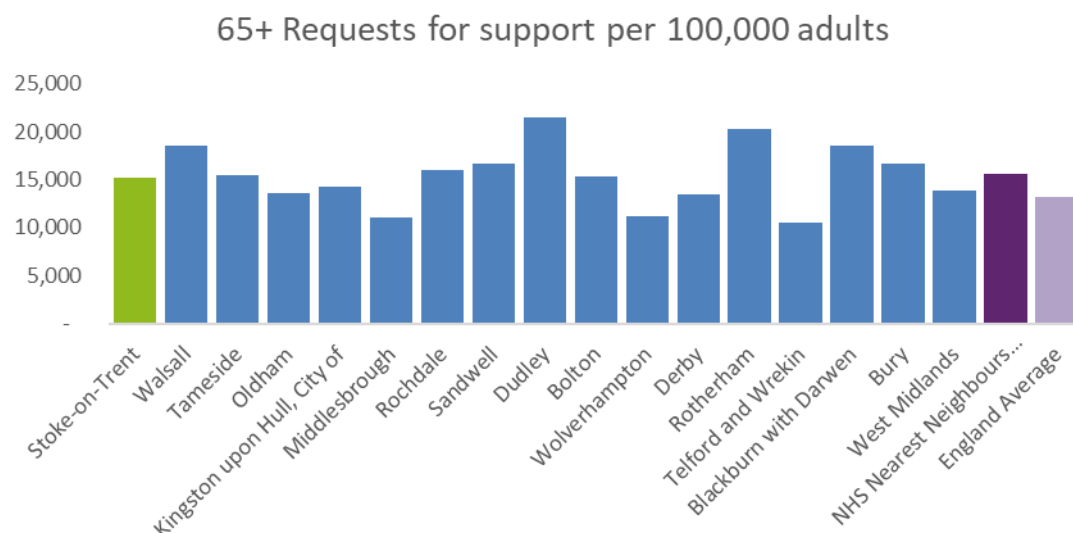


Assessment Outcome for 65+

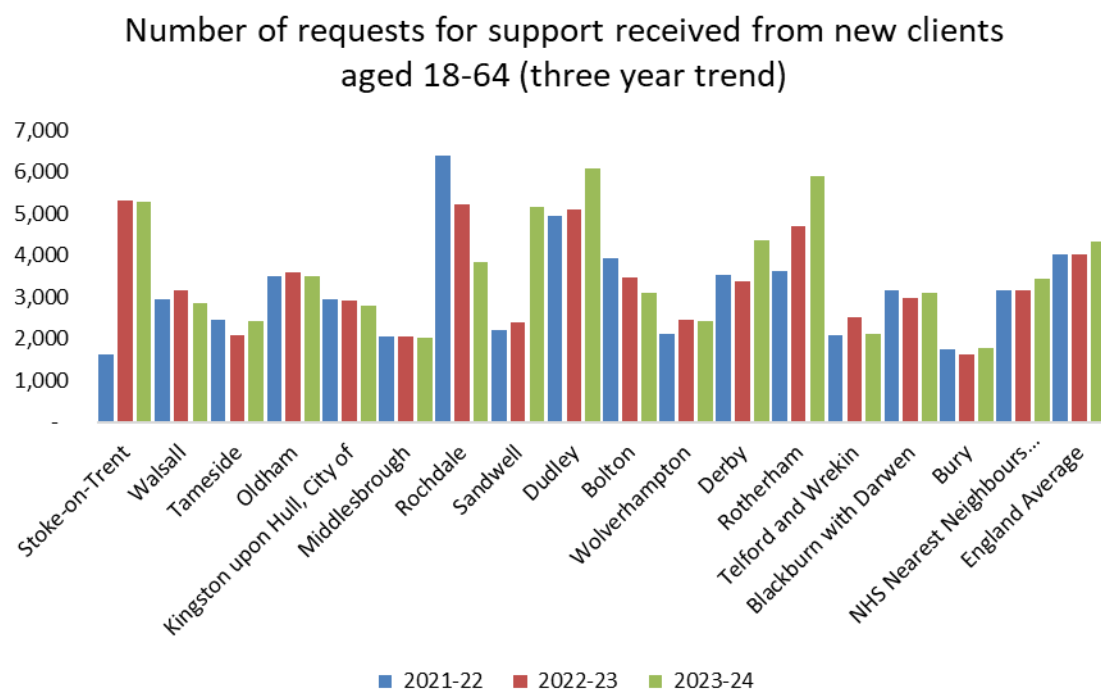


Requests for Support per 100,000 adults

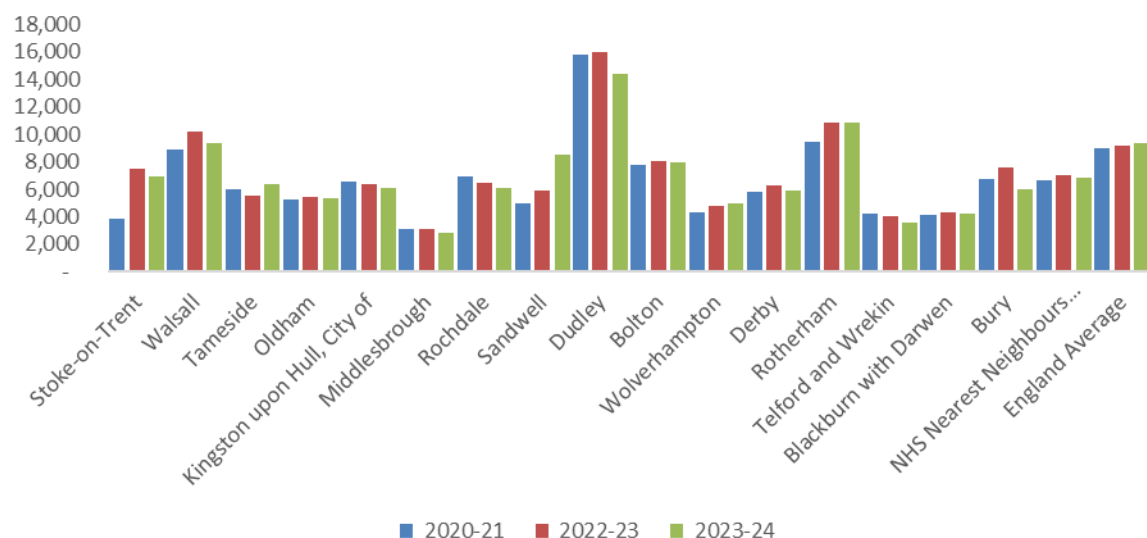




Requests for Support

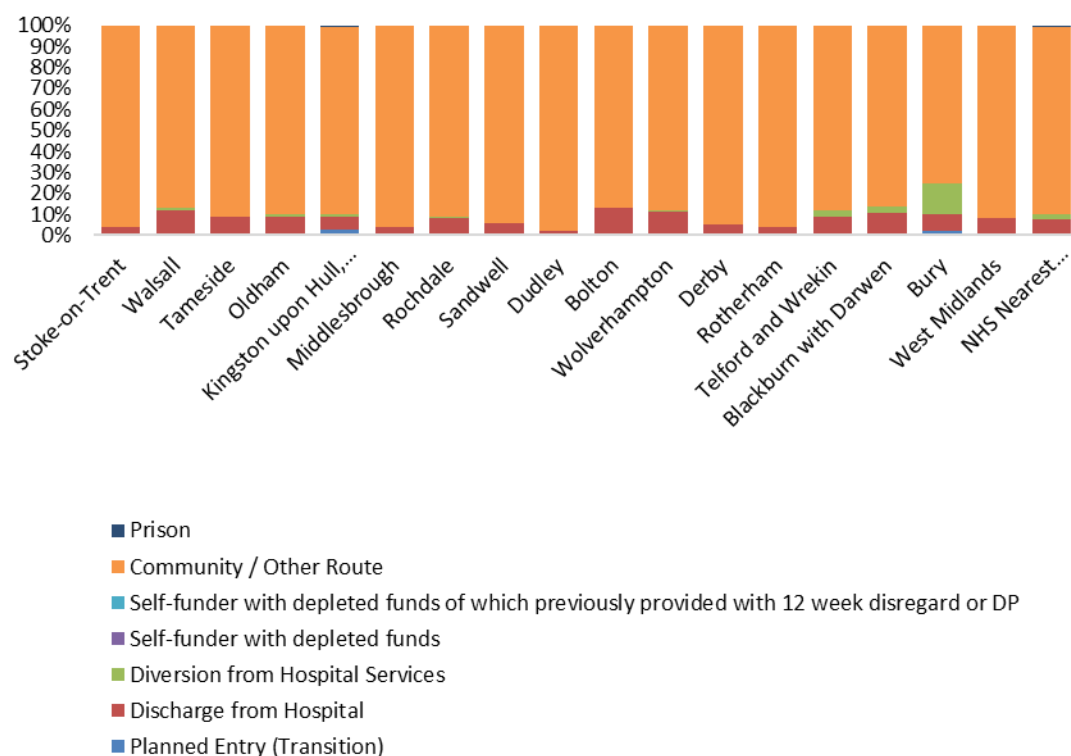


Number of requests for support received from new clients aged 65 and over (three year trend)

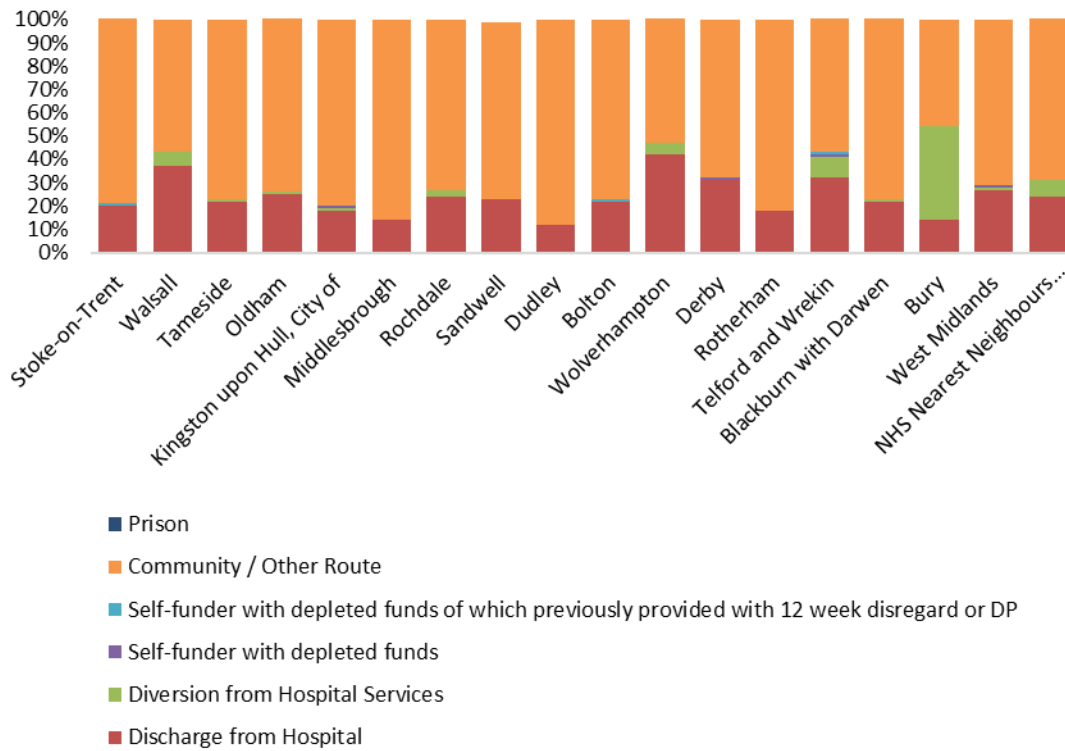


Source of referral

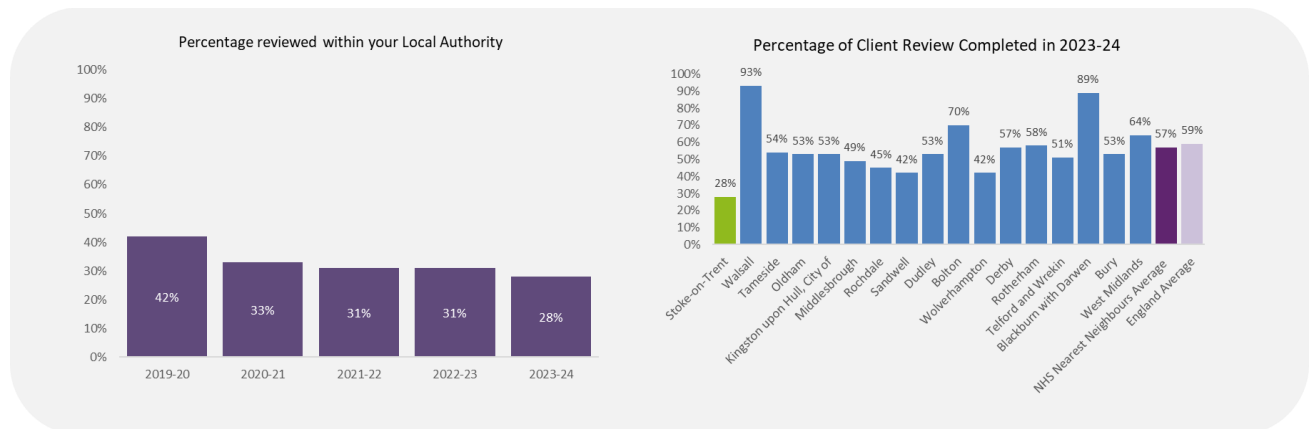
18-64 Source of Referral %



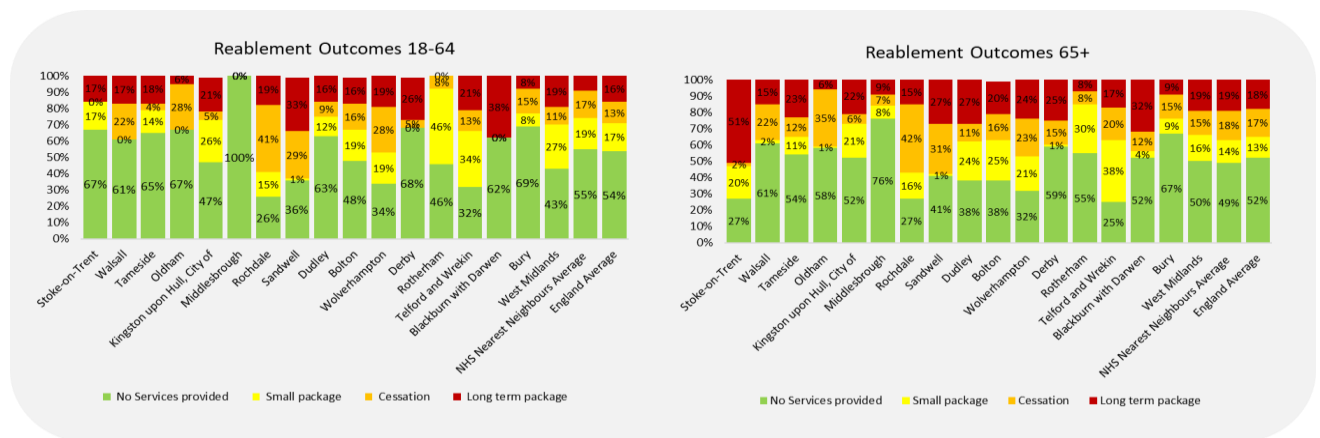
65+ Source of Referral %



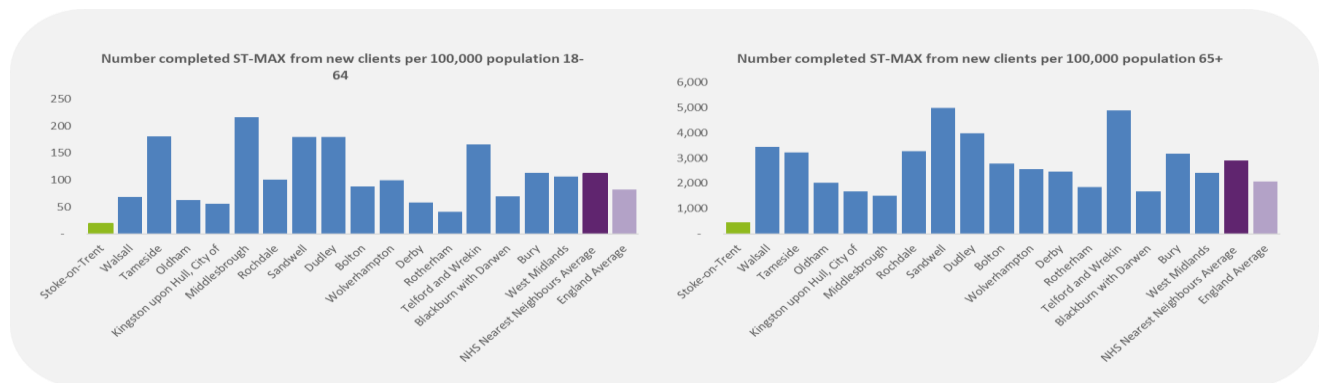
Review Effectiveness



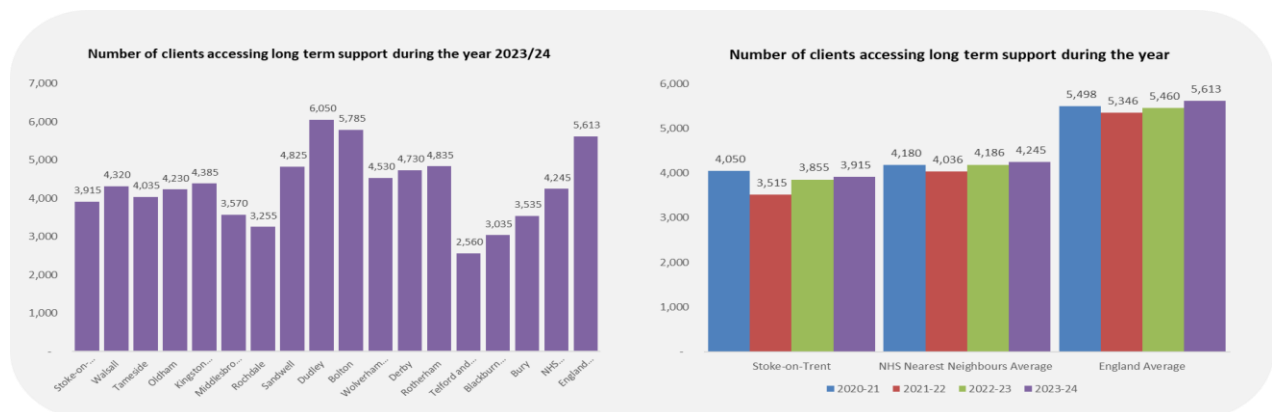
Reablement Effectiveness



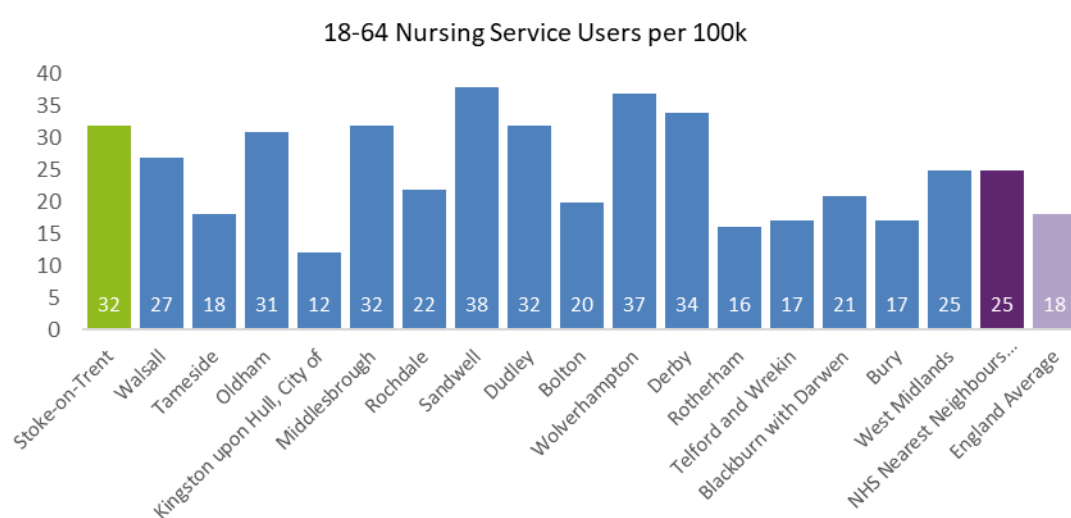
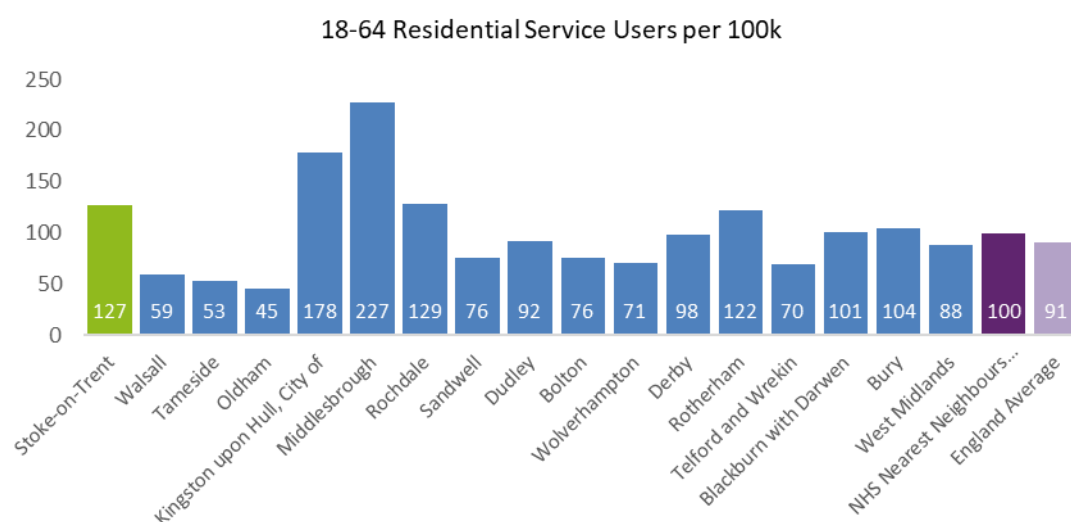
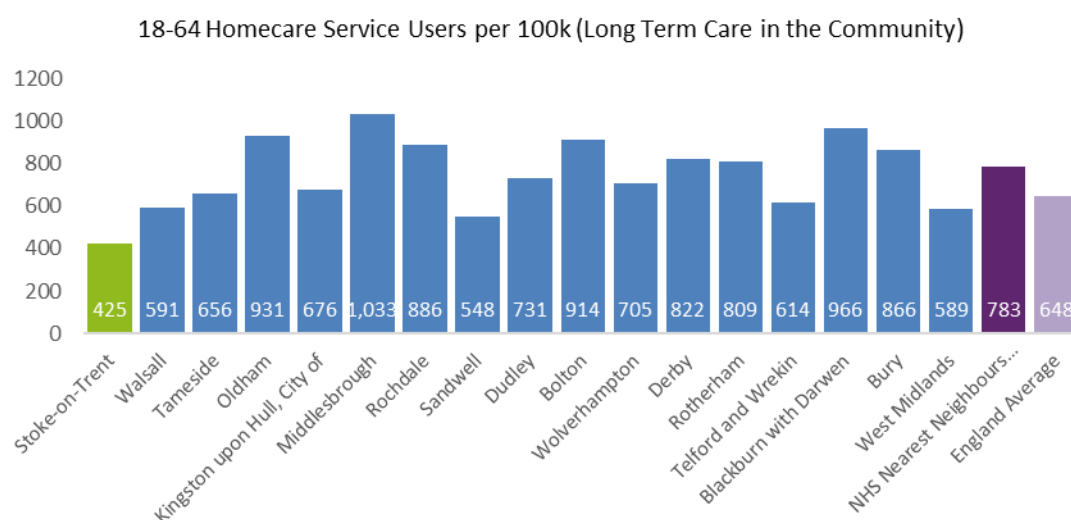
Completed ST-MAX



Number accessing long term support during the year

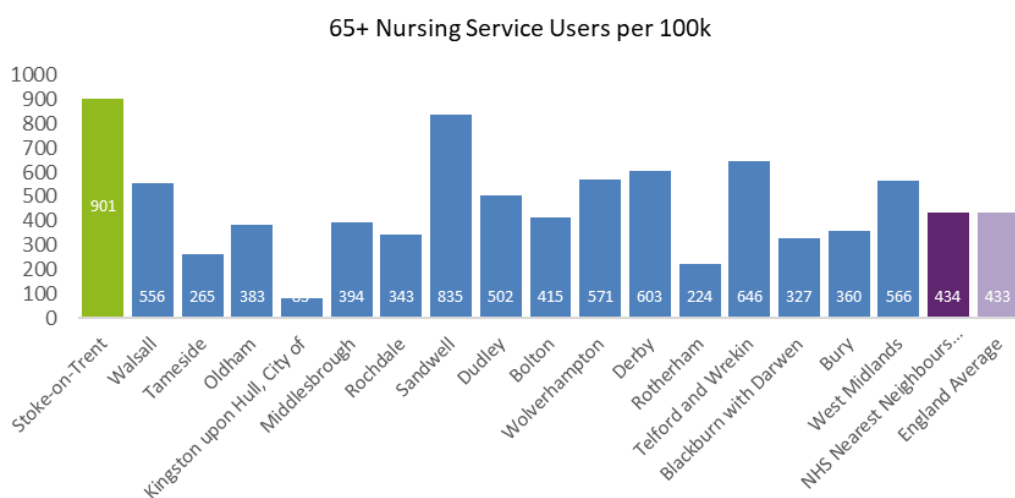
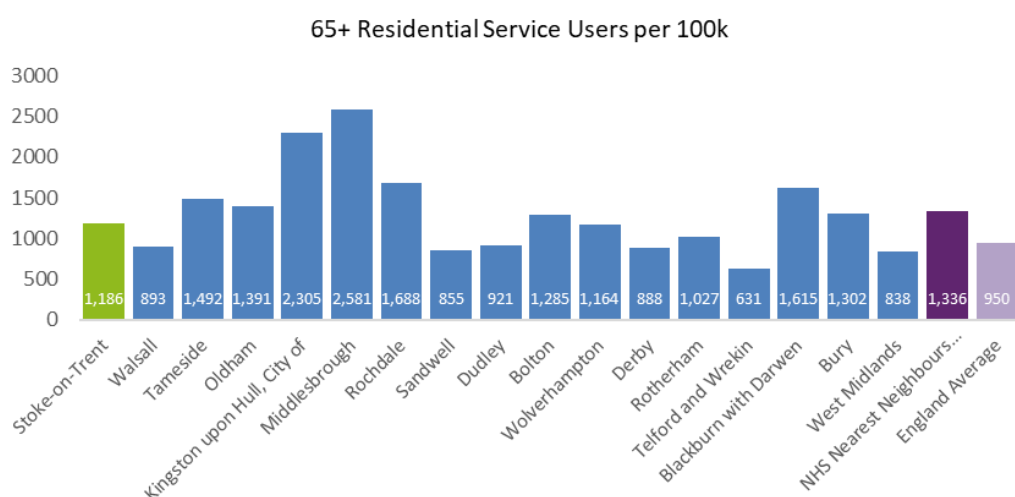
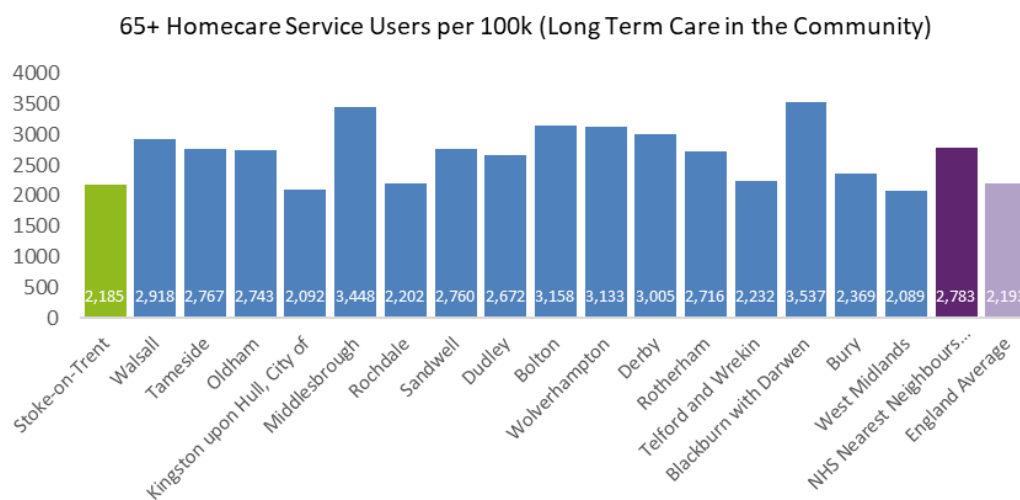


Number of 18-64 Adults in Long Term Care / 100k



- Use of bed based care for WAA is above NHS statistical neighbours and use of homecare below, which will be reflected in the higher long term care costs.

Number of 65+ Adults in Long Term Care / 100k



- Whilst use of homecare and residential care is in line, use of nursing care is significantly higher than NHS statistical neighbours.

Appendix 6: local democracy (historical context/roles)

Burgesses and Aldermen in Newcastle-under-Lyme

Historically, the burgesses and aldermen were key parts of Newcastle-under-Lyme's town governance, but these roles have since evolved or become ceremonial. The functions of these offices were changed by the Municipal Corporations Act 1835, and today the burgesses exist primarily as a charitable trust, overseen by a charity board and responsible for the oversight of activity and administration of an annual payment to burgesses, as set out below.

Historical burgesses and Aldermen

Before 1835

- A burgess (or "freeman") was a person with specific rights in the borough, including trading in the market, grazing animals on common land, and voting.
- To become a burgess, a man had to be apprenticed to a burgess, be the son of one, or purchase the title
- From 1590, the town's governing body was a common council made up of a mayor, two bailiffs, and 24 capital burgesses
- Former mayors held the title of alderman, though they had no specific powers associated with the title
- In 1816, the Newcastle-under-Lyme Inclosure Act enclosed the common lands, and the burgesses' land rights were replaced by a trust

After 1835

- The Municipal Corporations Act 1835 overhauled the borough's governance, replacing the "Mayor, Bailiffs and Burgesses" with a new council of "Mayor, Aldermen and Burgesses"
- The act barred the admission of new burgesses through traditional means, though the Burgess Lands Trust continued to pass entitlement to the trust on to the sons of existing burgesses
- The office of alderman was formally abolished nationwide in 1974 by the Local Government Act 1972, and the modern Borough of Newcastle-under-Lyme was created

The burgesses today

Today, the Newcastle-under-Lyme burgesses exist as the *Newcastle Under Lyme Burgesses Lands* charity, managed by a board of trustees

- **Rights:** Modern burgesses no longer have a role in the town's governance. Instead, they receive a share of the profits from the investment of their historic land holdings
- **Eligibility:** Membership has been historically limited to men, but this changed in September 2023 when Pauline Dawson became one of the first women to be admitted, paving the way for female descendants of burgesses to apply
- **Trustees:** The charity is currently managed by a board of trustees, with recent appointments occurring in 2025
- **Role of the local authority:** The Borough Council maintains the official record of admittance of burgesses, signed by the Mayor and co-signed by the Chief Executive as Town Clerk. The

Mayor formally recognises new burgesses in regular admittance ceremonies. Burgesses continue to play an active part in civic life, such as attendance at all major civic events, such as Remembrance Sunday

The Aldermen today

The political role of Alderman no longer exists for Newcastle-under-Lyme's borough council, having been abolished in 1974. The modern borough is governed by 44 councillors who are elected to represent 21 wards.

The Borough Council awards Honorary Aldermen status to former councillors who have served the borough with merit, being recognised for significant length of service, former Mayors or work within a special responsibility role. There are currently 26 Honorary Aldermen.

This is the only proposal for Staffordshire which explicitly sets out a proposal for retention of these ongoing civic traditions.

Appendix 7: interim plan and feedback

See attached interim plan and feedback documents:



Appendix 4B Interim Appendix 1 - Interim
Plan - Newcastle-UndPlan Feedback Form -

Appendix 8: Equality Impact Assessment (EIA)

Summary details

1. Project	Local Government Reorganisation Submission
2. Purpose of project	To comply with the Government's requirement for LGR across Staffordshire
3. Name(s) of assessor(s)	Vanessa Higgins – Policy and Strategy Business Manager Craig Jordan – Service Director for Planning Gordon Mole – Chief Executive
Department	As detailed above
Contact Details	Newcastle-under-Lyme Borough Council, Castle House, Barracks Road, Newcastle-under-Lyme, Staffordshire, ST5 1BL
4. Completion Date	07.11.25

Equality impact scoping

The evidence used in this assessment includes a range of quantitative and qualitative data gathered by the council and its partners for the purposes of producing a compliant LGR submission to Government by its 28th November 2025 deadline.

This includes financial modelling, performance analysis and benchmarking comparisons, service demand, risk assessments, demographic analysis and stakeholder engagement sessions plus a resident survey conducted between August and September 2025, which secured 1380 responses and evidenced support for the creation of a new unitary council based upon the existing borders of Newcastle-under-Lyme. This data is available within the Council's Submission document, which will be considered at full council on 19th November= 2025³⁴.

Equality Impact Assessment (EIA)

Characteristics	Neutral (✓)	Negative (✓)	Positive (✓)	Describe the way that your activity could impact on each protected characteristic and explain: Negative: What are the risks? Positive: What are the benefits and/or opportunities
All protected characteristics		(✓)	(✓)	Benefits and Opportunities: The Council has taken a stance against abolition of the two-tier local government system. However, delivery of the proposed unitary structure has the potential for better coordination of services at the local level. It could also reduce the confusion for service users that currently have to deal with multiple councils across parish, district and county tiers. In our resident consultation, the top four priorities for any new unitary council were: • Keeping services that are based on local need • Having local councillors who are close to local issues • Saving money while keeping local services running smoothly • Keeping what makes our area special There is potential for a new unitary authority based on the current borough footprint to meet these resident priorities with localised, high performing services and community representation. The final decision on LGR will be taken by HM Government. Risks: There is potential for disruption to service delivery during the process of LGR and/or a reduction in service quality depending on the model selected by HM Government. This will need to be mitigated as much as possible, in particular for people with protected characteristics. Mitigation: Any new unitary authority will need to continue to meet its legal responsibilities around equality, including under the Equality Act 2010. Once clarity around the final decision of LGR is known, a general mitigation for any risk of disruption to services would be to engage with staff and residents and implement the decision in a way which minimises disruption as much as possible.

				Once the Government's decision is known in late 2026, a full implementation plan will be invoked that will include further risk mitigation measures. We will establish transition boards with clear service continuity plans and agree corporate performance frameworks early to maintain consistent reporting. Changes will be phased to avoid overwhelming teams, and key performance indicators will be closely monitored to quickly address any service dips.
A person of a certain age		(✓)	(✓)	Benefits: A new unitary authority for Newcastle-under-Lyme would offer the potential for greater co-ordination of services designed for older people, and less confusion as to which council provides which services. For example, strategic housing and social care would be provided by the same council. Risks: There could be risks of fragmentation of services for older people from the disaggregation process. This could be impactful for adult social care services, which are currently provided by the County Council and would potentially be provided post LGR by two or more separate councils. Mitigation: Any new unitary authority will need to continue to meet its legal responsibilities around equality, including under the Equality Act 2010. Once clarity around the final decision of LGR is known, a general mitigation for any risk of disruption to services would be to engage with staff and residents and implement the decision in a way which minimises disruption as much as possible. Once the Government's decision is known in late 2026, a full implementation plan will be invoked that will include further risk mitigation measures. We will establish transition boards with clear service continuity plans and agree corporate performance frameworks early to maintain consistent reporting. Changes will be phased to avoid overwhelming teams, and key performance indicators will be closely monitored to quickly address any service dips.
A disabled person		(✓)	(✓)	Benefits: A new unitary authority for Newcastle-under-Lyme would offer the potential for greater co-ordination of services designed for people with a disability, and less confusion as to which council provides which services. For example, strategic housing and disability support would be provided by the same council. Risks:

				There could be risks of fragmentation of services for disabled people from the disaggregation process. This could be impactful for disability support services, which are currently provided by the County Council and would potentially be provided post LGR by two or more separate councils. Mitigation: Any new unitary authority will need to continue to meet its legal responsibilities around equality, including under the Equality Act 2010. Once clarity around the final decision of LGR is known, a general mitigation for any risk of disruption to services would be to engage with staff and residents and implement the decision in a way which minimises disruption as much as possible. Once the Government's decision is known in late 2026, a full implementation plan will be invoked that will include further risk mitigation measures. We will establish transition boards with clear service continuity plans and agree corporate performance frameworks early to maintain consistent reporting. Changes will be phased to avoid overwhelming teams, and key performance indicators will be closely monitored to quickly address any service dips.
A person of a particular sex, male or female, including issues around pregnancy and maternity	As per the above	As per the above	As per the above	As per 'all protected characteristics' assessment above
A person of gay, lesbian or bisexual orientation	As per the above	As per the above	As per the above	As per 'all protected characteristics' assessment above
A person of a particular race	As per the above	As per the above	As per the above	As per 'all protected characteristics' assessment above
A person with a particular religion or belief	As per the above	As per the above	As per the above	As per 'all protected characteristics' assessment above
Transgender	As per the above	As per the above	As per the above	As per 'all protected characteristics' assessment above

Marital status marriage and civil partnership	As per the above	As per the above	As per the above	As per 'all protected characteristics' assessment above
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Appendix 3 – Draft Interim Plan for Submission

Newcastle-under-Lyme Borough Council strives to work for the best interests of all of those who live in, work in and visit the borough. In demonstrating its effective working together with other authorities, the Borough Council has worked extensively with Staffordshire County Council and fellow district and borough councils in identifying working arrangements that provide good value for money where these partnerships make sense. These arrangements are locally agreed, dictated by need, not by blanket application. They are not limited by immediate proximity, and in some cases extend beyond local authority partnerships.

Locally-determined arrangements have included co-location of office premises with Staffordshire County Council and Staffordshire Police at Castle House, bringing financial and other benefits including a reduction in carbon emissions, a significant annual revenue saving through a reduction in running costs.

Joint working arrangements include those with the County Council – internal audit, communications and legal support, and with other Councils including Stoke-on-Trent City Council in areas such as out of hours response, community safety and building control. The Borough Council has had a strong collaboration with the County Council on regeneration and economic development, bringing in over £55 million into the Borough of UK Government Levelling Up funding.

This interim plan starts from a position which **affirms that the existing two-tier local authority system works, and works well, in Newcastle-under-Lyme**. Local government reorganisation has asked that all Principal authorities respond to the call from the Secretary of State for Housing, Communities and Local Government, via the Minister for Local Government's statutory invitation to submit a proposal for local government reorganisation in Staffordshire. This plan represents an assessment of all options, confirms those which the Borough Council supports the investigation of, and which it does not.

1. The lessons of the past inform the context of our future

The Loyal and Ancient Borough of Newcastle-Under-Lyme's long history, over 850 years, was recognised by the late Queen Elizabeth who granted its most recent borough charter in 1974, following the Local Government Act of 1972. This was the latest charter in an unbroken line dating back to 1173, when records show that Henry II had granted a charter to the town and gave strong support to the early borough over the next decade. Further royal charters were been granted to the borough by Kings Henry III, Edward I, Edward II, and Richard II, Queen Elizabeth I, Kings Charles II, James II and Queen Victoria.

This history of mercantile trade has spanned from Newcastle-under-Lyme's position – on trading and economic routes to and from all points on the compass, the link point between the great cities of the industrial age (particularly London to Liverpool, Manchester to Birmingham) with important county borders and strong economic links to Cheshire and Shropshire, connectivity to the Greater Manchester and wider East and West Midlands regions, and local synergies with Staffordshire. One of the first great industrial places, Newcastle today represents the positive transition from industrial economy to a knowledge based, higher skilled economic geography, seen as a model of innovative regeneration and adept investment by the Industrial Communities Alliance and wider local authority peer networks.

2. A well-connected, outward-looking place centred on its people

The two junctions of the M6 within the borough, and east-west links via the A50/500 and more widely routes to the M54, show that Newcastle remains today, as in the past, a geographically and economically important strategic location for investment and trade.

Newcastle's identity is built on an outward-looking and self-confident sense of place, one in which it is proud of its history and traditions, but embracing of innovation and thinking differently, from being the home of one of the UK's foremost universities to being a place which leads with pride on sustainability and biodiversity.

Central to this delivery is a local authority close to the needs and wishes of residents, businesses and visitors – outward-looking and locally focused. Newcastle-under-Lyme Borough Council has shown that it can respond to these needs, from safer places to live, work and visit to ensuring that this is a place fit for the future:

- Civic Pride – from its award-winning Britain and Newcastle in Bloom achievements, to the introduction of the Civic Pride campaign to work with partners, residents, voluntary organisations and businesses, local people have demonstrated their desire to get behind borough-focused activities which support making our places cleaner, safer and friendlier.
- Net Zero and Sustainability – the Council has been able to adapt its working practices, investment and service delivery to ensure it meets its ambitious targets set out when it declared a climate emergency, including tree planting, planning, fleet and assets, and has worked with the private and academic sectors in developing borough-level initiatives. The ability to control these changes at a local level have been a near 70% reduction in our controlled carbon emissions.
- The Local Government Peer Challenge reported in 2023 that Newcastle-Under-Lyme Borough Council was delivering quality services for its residents, and that particularly it had strengths in the following areas:
 - Strong pride of place and Newcastle-under-Lyme has a distinct identity
 - Partnership working is particularly strong and the role it has in bringing others together to collaborate is highly valued
 - Clear leadership from the Cabinet and senior officers
 - Finances are healthy, and actively managed, which places it in a stable position
 - Officers are recognised as important assets for us and they are committed and keen to deliver for the communities.
- The Borough Council has demonstrated that it can focus and influence actions and decisions at a local level, close to residents, across areas which matter to them. This has recently included a number of key interventions.
- Regeneration & Planning – developing working partnerships with developers and investors, our local social landlord and community interest groups, delivering a town centre regeneration programme in both Newcastle and Kidsgrove supported by Levelling Up funds which is responsive to both local need and investor opportunity. Forging and maintaining partnerships with national and local bodies has been both possible, and through nimble decision making has seized investment opportunities where a greater level of bureaucracy, a greater number of priority areas and more remote decision making may have stalled progress.

- The Borough Council's dedicated focus on supporting the community with the extensive and ongoing issues at Walleys Quarry would likely not have been a priority for a larger, more remote authority with multiple demands. This included the Council being bold in using its powers and pressing for permission to pursue legal action against the operators when other agencies were not doing so.
- The increased attraction to visitors of the Brampton Museum, attracting investment and greater footfall, expanded facilities and usage by local groups. As the Borough Council's primary cultural facility, efforts have been focused on supporting growth and a heritage-led cultural offer for the borough. These advantages may be lost if the Borough is submerged into a larger Council.
- A strong leisure offer, built on local partnerships. Recognising that differing models of delivery work better in local places, the Council has both invested in the Jubilee 2 centre, working with the healthcare sector, local users and groups, but has also supported and secured investment for the community-run Kidsgrove Sports Centre, both facilities providing a complimentary offer across our two towns and the wider borough.

3. A suitable economic area, with room to grow

The people of Newcastle, Kidsgrove and our villages and rural settlements identify with their place in a number of ways, within the context of the places that they are proud to call home, earn a living, gain a meaningful education at school, college and university in the borough and spend their leisure time. At a local level, the first identification is with their local community – from Talke and Kidsgrove in the north of the borough to the Town ward as one of our key urban centres, to Keele and onwards to Westbury Park and Northwood, each with its own unique identity and sense of place.

Secondly, as the recent celebrations of the borough's 850th anniversary demonstrated, the people of Newcastle-under-Lyme identify with the borough itself, its rich history and strong sense of place.

Thirdly, we absolutely recognise our place within a wider geography – the positive effect of a strong containment in Staffordshire means that residents can choose to live, seek learning and leisure and work in the same county, retaining spend within our county geography. This is a positive, community wealth feature of Newcastle and Staffordshire more widely.

We also reflect that with its expansive geography, some of our communities naturally look to other places – from Mow Cop with its spilt conurbation between Newcastle and Cheshire East, to Madeley at the border with rural Shropshire and the Westlands bordering Stafford, with Wolstanton and May Bank bordering our neighbours in Stoke-on-Trent, our well-connected place can and should look to have a cohesion with not one geography but exploit and maximise each and every one of its economic links. The Borough Council continues to use funding to invest in connectivity, including its strong partnership in bringing forward the K bus route, linking Keele, Newcastle town centre and key transport infrastructure.

For this reason, we believe that both the Strategic Authority area and any new council arrangements should reflect a population size and geography that makes sense first and foremost to our residents, businesses and anchor organisations.

The Borough's emerging Local Plan, currently due for examination, seeks to reflect the desire to have a sustainable level of housing growth to meet local needs, whilst retaining green space, biodiversity and above all quality of development, fitting with what residents and businesses expect in a twenty-first century place. In this, the Borough Council has been careful to allow time for comprehensive consultation, beyond the statutory minimum. This development of what we hope is a cohesive, joined up and thought through place for housing and economic growth has been enhanced by its local focus, not by regional imperatives.

We know that Newcastle has housing stock which does not fit with local demand – and the Local Plan sets out a path to creating the right homes, in the right places, with the right amenities and connections to local infrastructure.

Above all, our locality is defined by what it is – a proud, ancient borough, but also by what it is not – an extension of another place, a dormitory, a suburb. In this regard, we have considered the options available which can be additive, not reductive, of Newcastle's identity.

This assessment is not to talk down any part of our region – economically, we will strive for and all gain from economic investment in our region at all scales – from local businesses starting up and growing across Staffordshire and Stoke and beyond, to established global advanced manufacturing and world class service industries, with innovative regenerators of our town and city centres together with cutting edge spin-outs from our great academic institutions – all have a part to play at attracting and retaining investment, and the higher-skilled, higher-paid jobs we all aspire to be available to those who live and work here.

With this in mind, we need to be clear on a number of factors:

- A majority of support from our residents to move to a new structure of local government;
- A balanced economy where places which invest and manage finances with strong fiduciary responsibility are not placed at disadvantage in 'plugging gaps' in areas which are struggling;
- A level of governance which demonstrates the true objective of devolution – having decisions made at the most appropriate local level, closest to those the decisions will affect;
- A geography which has meaning for investors, businesses, residents and anchor organisations (including co-terminus delivery where this makes sense)
- A population size which broadly aligns to broader objectives but has a local rationale – not so distant as to be remote governance, not an arbitrary level which confuses geography and population.
- A solution which will ensure that we continue to deliver quality services at the **highest possible standard**, not to the lowest common denominator or on a reduced basis to address historic financial troubles.

4. Defining a Strategic Authority

The Government has set out that, in addition to the creation of new local authority structures to unlock devolution, it wishes to establish new Strategic Authorities (SAs) at a wider geography to provide the basis of greater levels of regional representation and investment. The primary models set out by the Government are:

- Foundation SAs (these include non-mayoral combined authorities and combined county authorities automatically, and any local authority designated as a Strategic Authority without a Mayor).

- Mayoral SAs and Established Mayoral SAs (such as the Greater London Authority, all Mayoral Combined Authorities and all Mayoral Combined County Authorities will automatically begin as Mayoral Strategic Authorities. Those who meet specified eligibility criteria may be designated as Established Mayoral Strategic Authorities. This unlocks further devolution, most notably an Integrated Settlement).

We are supportive of the creation of a new Strategic Authority to serve the collective needs of Staffordshire and Stoke. Given its connection along council boundaries and the M6 as our point of economic linkage, we believe it makes sense to also consider a Strategic Authority area which includes Shropshire (and if appropriate Telford & Wrekin) which would have the additional advantage of ensuring no area is 'orphaned' within the SA process. We anticipate that these areas will work collectively in the shaping of an SA which meets the needs of our collective geography and builds on our collective devolution ambitions, as set out to the Government in Autumn 2024, where we noted that our devolved region should have the following key features:

- Devolution must work for all: plans must reflect and respond to a deep understanding of local needs and opportunities. That is what our authorities have been working hard at over the summer.
- Form must follow function: if we are to accept another layer of governance in the county, at additional cost to the people of Staffordshire and Stoke-on-Trent, then the prize in terms of devolved functions, powers and resources has to be significant.
- Governance has to be inclusive: our Leader's Board works because all local authorities get to participate and contribute, and we want to ensure that this is also the case in any devolved arrangements.
- Commitment to subsidiarity: devolution should be to the most appropriate level of governance for the function in any question, and that should mean a combination of county-wide, local authority level and, perhaps most importantly, community level. We seek a devolution deal that gives us flexibility to make those judgements together.

Devolution at a Strategic Authority level is not about local service delivery, but rather setting the conditions at a strategic level, making the case for and directing funding towards, for example, areas to develop infrastructure at a local level

With this in mind, we remain of the view that an Elected Mayor model does not fit neatly with the collective aims and ambitions of Staffordshire and Stoke, our approach to date or our collective track record, where initiatives such as We Are Staffordshire are seen by investors as a model of joined up, grown up and equitable partnership delivery. Newcastle would therefore support a model aligned to that of a full, established Strategic Authority, but not the introduction, unless mandated by Government, of a Mayoral model.

5. The financial case for thinking locally

The Government anticipates that the process of reorganisation will create the conditions for addressing the cumulative financial pressures on local authorities. It is useful to note that, as with other local authorities, Newcastle has faced a continued real-terms reduction in spending power, resulting in the need to make significant year-on-year savings. In this, it has

demonstrated an efficiency of approach over as long period of time whilst maintaining quality service delivery for both statutory service provision and investment in local priorities.

The Government further notes in its guidance for councils that for areas covering authorities that are in Best Value intervention and/or in receipt of Exceptional Financial Support, proposals must additionally demonstrate how reorganisation may contribute to putting local government in the area as a whole on a firmer footing and what area-specific arrangements may be necessary to make new structures viable.

As noted by the Chair of the Local Government Association, Government also needs to commit to funding councils to deliver on the reforms set out in the White Paper.

Whilst we firmly support the principle that areas with the greatest need and significant challenges need a funding formula which works in their interests, and that this must be reflected in settlements in the future, this should not in our firm opinion be viewed through the lens of 'one area pays for another'. Residents rightly expect that their funding of local government through council tax, non-domestic rates for the companies they run and work for and through general taxation can clearly be linked to quality service provision at a local level.

In our consideration of options, we are mindful that residents should not be asked to unreasonably contribute to distant and disjointed from their localities. If a unitary model is to be imposed, it must be on the basis of a geography which balances advantaged and disadvantaged areas and continues to deliver the very highest possible level of services, locally. This is separate to the equally important goal of using the levers of power, individually and collectively as authorities, to increase wealth creation and retention across our region.

In order to achieve a balanced and less financially burdensome approach to reorganisation, one option may be for Government, instead of the creation of new unitary councils, to invite the de-unitarisation of Stoke-on-Trent City Council, re-establishing it within Staffordshire as a city district as per the arrangements pre-1997.

Further collective working

As noted above, Newcastle has a strong ethos of, and is recognised for, effective partnership working with the public, private, third and academic sectors. In this, we have collectively fostered an agile and 'can do' approach from community safety to regeneration. In the establishment of new council structures, we must therefore ensure that we are not reductive – that is, taking existing structures delivered at appropriate scales and fitting them into new structures which may be less effective in obtaining outcomes for our residents, or creating in-built inefficiency. We support the goal set out in the White Paper to identify opportunities to deliver public service reform, including where they will lead to better value for money.

With this goal, we believe that – as we currently work – shared services where they make sense above individual unitary councils should be explored for joining up areas including data, waste treatment, net zero ambitions, energy supply, smart systems and processes to maximise efficiency. This is **separate** to the manageable geography of a council area, but must be built into future service design.

6. Local delivery below existing Borough Council level

Existing parish and town councils play an important part in local democracy and accountability, and can deliver focused services which meet needs at the most local level.

However, the creation of a network of parished areas and town councils should not be seen as a direct substitute for existing delivery arrangements, and the following would need to be carefully considered for future arrangements:

- Avoiding artificial structures to fill gaps where these are not responsive to locally identified geographies;
- Ensuring that parish and town councils have the powers and capacity they need to be self-sustaining and not be dependent upon higher tier authorities for funding for service delivery;
- Not to place undue burdens on residents through precepts which have to fill gaps in provision left by the abolition of district and borough councils.

7. An appropriate population size

The options considered below range in population size – some below and some above the Government's indicated figure of c. 500,000 population. This reflects the fact that the options are not of an arbitrary size, but need to consider a broad range of factors, as the Government itself notes may be the case. Across England, existing unitary authorities such as Peterborough, Telford & Wrekin, Torbay and most recently (in respect of creating a combined authority) York fall well below this threshold, as do most London Boroughs and Greater Manchester authority areas. This is not a negative, rather a reflection that there is no one-size-fits-all model for good governance and delivery.

8. Good governance at an appropriate size

The planned forced reorganisation of local government continues a path of reducing numbers of elected members representing local areas. From over 75,000 in the 1960s, the figures have been reduced to some 19,000 nationally today. We do not take a firm view on the appropriate number of councillors in each model, as this remains to be further considered and explored to balance ward/division size and genuine local accountability. As such, our consideration rather assesses the potential to have good governance at a local level. The Government should consider, given the large-scale reorganisation of councils, whether a national formula or guidance for councillor numbers should be developed to prevent inequity and a lack of local representation. This should be through a full boundary review by the Boundary Commission before the creation of any new unitary authorities.

9. Options to be investigated or not taken further

We have considered the below options against a range of factors for consideration firstly by our own Council and then by Government.

In making this assessment, at this stage we consider models which could – with willing partners – be considered ahead of submissions of final proposals in November, should Government not accept our central premise of retaining a two-tier authority model, with an overarching SA acting for us all regionally.

10 A. A New Unitary Council for Newcastle-under-Lyme

In this model, a new unitary council delivering all services currently falling to both county and borough council levels would be created, operating on the footprint of the existing Newcastle-under-Lyme borough council. This new authority would require the transfer in of the staff and assets of both authorities for the Newcastle area. Estimated one-off costs would need to be identified .

This model would ensure the closest delivery to residents of Newcastle-under-Lyme, with few changes to existing governance arrangements (akin to those of the Borough Council). The population size is the smallest of all options listed (summarised in Table A, below). This

is broadly equivalent to existing smaller, well-managed unitary authorities including Torbay and Windsor & Maidenhead.

10 B. The creation of a new unitary council across the existing geographies of neighbouring Newcastle-under-Lyme and Staffordshire Moorlands

A new unitary council could operate across the contiguous existing footprint of Newcastle-under-Lyme and Staffordshire Moorlands. These areas both have borders with other neighbouring authorities, including Stoke and Cheshire, and particularly share the characteristics of towns and rural areas which the two current authorities are experienced and adept at delivering quality services within. This model would also mitigate risks of economic imbalance (i.e. the two existing district/borough areas funding but not necessarily benefiting from, a merger with the city of Stoke).

The population size of the authority would be equivalent to the existing North Somerset council and larger than Telford & Wrekin.

In its Council report of 5th March 2025, Staffordshire Moorlands District Council noted that whilst it was considering options put forward for North Staffordshire and a single Staffordshire unitary authority:

It needs to be supported by robust evidence and analysis and include an explanation of the outcomes it is expected to achieve, including evidence of estimated costs/benefits

- *The new unitary councils both need to be financially sustainable and have appropriate tax bases which do not create an undue advantage or disadvantage for one part of the area – this will be a particular challenge in North Staffordshire given the cost demand pressures in Stoke-on-Trent*
- *It improves local government and service delivery in Staffordshire as a whole*
- *It avoids unnecessary fragmentation of services and mitigates the potential impacts for the disaggregation of crucial upper tier services such as social care, children's services, SEND; public health etc.*

The report further notes that any new model needs to have been tested through robust local consultation.

10 C. The creation of a new 'West Staffordshire' unitary council based on a connected M6 corridor, comprising Newcastle-under-Lyme, Stafford, Cannock, South Staffordshire.

This model of new unitary would cluster a new unitary around Staffordshire's primary connection to the rest of the United Kingdom and beyond – the M6 corridor. Representing authorities bordering this corridor, the authority could support the devolved Strategic Authority in being a particular engine of economic growth and development, and holds a cohesive geography of similar authorities in Staffordshire in terms of economic characteristics, rural and urban mix and a population size close to that of the Government's indicated requirement at just under 500,000 on latest population figures. This would give a unitary of an equivalent population size to Wiltshire and County Durham.

At time of writing, not all of the above authorities have published their preferred models of unitary council, but are understood to favour a two-unitary model in Staffordshire.

10 D. The creation of a new unitary council comprising the existing unitary area of Shropshire and the existing borough geography of Newcastle-under-Lyme

Whilst not historically joined under a ceremonial county structure, Newcastle and the existing unitary council of Shropshire share a long border, extending to Shropshire addresses and

postcodes for many residents in the west of Newcastle. As with Staffordshire Moorlands, Newcastle and Shropshire share a cohesive sense of place – historic market towns with an established and characteristic rural hinterland. The council would also incorporate two sides of the M6 corridor (as noted above) with onward links to the M54 corridor.

Shropshire is an existing unitary council and has not been required to develop interim proposals for reorganisation. This option will be further investigated following County Council elections to test viability.

A Newcastle and Shropshire authority (similar in nature to that of Devon & Torbay and Kent & Medway) would be equivalent in size in population terms to Cheshire East and larger than many existing unitary authorities.

The new unitary would require a Strategic Authority area including both Staffordshire and Shropshire (and possibly including Telford & Wrekin).

10 E. The creation of a new unitary council on the footprint of the existing Staffordshire County Council.

At its Cabinet meeting of Staffordshire County Council of 5th March 2025, the County Council endorsed a submission to its full Council for a whole Staffordshire single unitary council on the footprint of the existing County Council (therefore not including Stoke-on-Trent). It noted that there were a number of perceived advantages to such a model, including a smoother transition from existing arrangements to a new shadow authority and standardisation of services and the removal of any 'postcode' lottery of local government service delivery or standards. As well as an opportunity to potentially reduce costs of local government and to divert duplicated costs into frontline services.

The report notes that unitarisation can play its part in solving the current funding crisis in local government. It cannot however in isolation fully solve the problem.

At this stage, concerns would remain as to the functional size of the proposed new unitary (with a population of over 800,000 it would be larger than most existing unitary authorities) and the attendant perceived or actual remoteness of service delivery and decision-making that this may result in. Further work on the model (which has the advantage of mitigating against particular financial risks arising from a merger with Stoke) would need to be explored in significantly further detail for the model to be supported.

We require to be convinced of the local democratic and delivery arrangements if these would necessitate additional costs to residents through new lower-tier town and parish councils.

10 F. The creation of a new North Staffordshire unitary council for Newcastle, Stoke-on-Trent and Staffordshire Moorlands.

At its Cabinet meeting of 25th February 2025, Stoke-on-Trent City Council's Cabinet agreed its preferred position for a new unitary authority across the footprint of Newcastle-under-Lyme, Staffordshire Moorlands and Stoke-on-Trent. The paper also set out a wider potential footprint to include Stone and Uttoxter. This detailed analysis set out characteristics of a new authority boundary and economic geography based on a city-region. With this approach, the report sets out the financial advantages to addressing historic financial challenges the city has faced through a new distributive model of balancing lower council tax income from the city with higher band properties in neighbouring areas.

A new unitary of this scale would be equivalent to Bristol and would be based around a city-region model of the city as the centre of the authority, retaining a city identity within the new authority area.

In Newcastle's report of 22nd January 2025, key reasons for resisting a merger with Stoke were set out, primarily around risks of loss of local identity (where, as noted above, Newcastle residents do not consider themselves to be part of the city) and financial resilience (where Newcastle is carrying no debt, Staffordshire Moorlands has limited debt and the city is in receipt of extraordinary financial support).

These factors, taken together, imply that Newcastle would not benefit from a city-region North Staffordshire model.

11. Options Matrix

OPTION							
Councils/sub-Council areas (based on current Council footprint)	Population size (Assumed 500k threshold for new unitary)	Aligns to wider public sector boundaries (Police, NHS, Fire & Rescue etc).	Democratic arrangements	Discussed with relevant authority ²	Strategic Authority arrangements	Economic balance (no advantage/disadvantage)	Notes
Newcastle-under-Lyme	125,404 – equivalent to other existing unitaries as noted	Yes (as part of Staffordshire)	Could retain existing councillor numbers and wards, no boundary changes	Yes	Staffordshire or wider SA	Same levels as currently	Model requires the creation of a new unitary council on the existing Newcastle geography
Newcastle-under-Lyme and Staffordshire Moorlands	221,308 – equivalent to other existing unitaries as noted	Yes (as part of Staffordshire)	No boundary changes required	Yes	Staffordshire or wider SA	Similar levels of economic indices across the two authority areas.	Could work with either Staffordshire or broader SA
Newcastle-under-Lyme and Shropshire	452,582	Crosses two geographies for Police, Fire, ICB	Formed of an existing unitary and a borough council, would require review post-vesting.	Yes	Requires wider SA of minimum Staffordshire and Shropshire	Similar levels of economic indices across the two authority areas	Shropshire is not required to reorganize but may choose, post-elections, to consider relevant

¹ Population size Small Areas England and Wales, NOMIS, 27 February 2025

² Initial discussion held with Councillor/Officer within the relevant authority on a ‘without prejudice’ investigative basis.

Staffordshire Unitary (not including Stoke-on-Trent)	886,284	Yes (police, fire, ICB)	Boundary review required post-implementation . County council has provided initial opinion on councillor requirements. Potential for remote decision	Yes	Requires a minimum Staffordshire-level SA	Same levels as currently	Requires creation of broader SA of Shropshire, Staffordshire, Stoke-on-Trent (and possibly Telford & Wrekin). Stoke-on-Trent remains as existing unitary on existing boundaries.
Staffordshire Unitary (including Stoke-on-Trent)	1,112,249	Yes	Boundary review required post-implementation . Very large and potential for remote decision making	No	Requires wider SA of minimum Staffordshire and Shropshire	Large area crossing all economic indices	Requires creation of broader SA of Shropshire, Staffordshire (with or without Telford/Stoke) and possible de-
West Staffordshire – Newcastle, Stafford, Cannock, South Staffordshire	471,100	Yes (as part of Staffordshire)	Boundary review required post-implementation (assuming no existing geographies are split). Requires consideration of local democracy arrangements	Yes	Requires a minimum Staffordshire-level SA	Likely to be broadly positive	Untested model through Staffordshire Leader Board, to be considered against a North/South two unitary model for Staffordshire – provides a geography which connects places along the M6

North Staffordshire (Stoke-on-Trent, Staffordshire Moorlands, Newcastle-under-Lyme)	481,316	Yes	Boundary review required (assuming no existing geographies are split or added to). Requires establishment of local democracy arrangements to ensure decisions are focused across all geographies (not city-centric). Stoke negotiation paper sets out a heavy weighting to the city in representation.	Yes	Requires a minimum Staffordshire-level SA	Current imbalance across tax take for the city and two district authorities	Preferred model of Stoke-on-Trent City Council, option under consideration for Staffordshire Moorlands. Not supported by Newcastle's full Council of January 2025.
Newcastle-under-Lyme remains a borough within a county system (Status Quo)	125,404 – the same size as some existing unitary authorities	Yes – as current	As current arrangements	Yes	Could work within a Staffordshire or broader SA	As current	Preferred model of Newcastle-under-Lyme proposed at full Council of March 2025

The above table provides a matrix assessing potential options for Local Government Re-organisation only



3 June 2025

LOCAL GOVERNMENT REORGANISATION

INTERIM PLAN FEEDBACK: STAFFORDSHIRE AND STOKE-ON-TRENT

To the Chief Executives of:
 Cannock Chase District Council
 East Staffordshire Borough Council
 Lichfield District Council
 Newcastle-under-Lyme Borough Council
 South Staffordshire District Council
 Stafford Borough Council
 Staffordshire County Council
 Staffordshire Moorlands District Council
 Tamworth Borough Council
 Stoke-on-Trent City Council

Overview:

Thank you for submitting your interim plans. The amount of work from all councils is clear to see across the range of options being considered. For the final proposal(s), each council can submit a single proposal for which there must be a clear single option and geography and as set out in the guidance we expect this to be for the area as a whole; that is, the whole of the area to which the 5 February invitation was issued, not partial coverage.

Our aim for the feedback on interim plans is to support areas to develop their final proposal(s). This stage is not a decision-making point, and our feedback does not seek to approve or reject any option being considered.

The feedback provided relates to the following interim plans submitted by Staffordshire and Stoke-on-Trent councils:

- Interim Plan for Devolution and Local Government Reorganisation in Staffordshire and Stoke-on-Trent submitted by Cannock Chase District Council, East Staffordshire Borough Council, Lichfield District Council, South Staffordshire District Council, Stafford Borough Council, Staffordshire County Council, Staffordshire Moorlands District Council, Tamworth Borough Council and Stoke-on-Trent City Council. This includes the following supplementary responses:
 - Interim Plan for Devolution and Local Government Reorganisation in Staffordshire and Stoke-on-Trent submitted by Staffordshire County Council.

- Interim Plan: Supplementary Response by Stoke-on-Trent City Council submitted by Stoke-on-Trent City Council.
- Local Government Reorganisation in Southern and Mid Staffordshire Interim Plan submitted by Cannock Chase District Council, East Staffordshire Borough Council, Lichfield District Council, South Staffordshire District Council, Stafford Borough Council, and Tamworth Borough Council.
- Interim Plan for Newcastle-Under-Lyme submitted by Newcastle-under-Lyme Borough Council.

We have provided feedback on behalf of central government. It takes the form of:

1. A summary of the main feedback points,
2. Our response to the specific barriers and challenges raised in your plans,
3. An annex with more detailed feedback against each of the interim plan asks.

We reference the guidance criteria included in the invitation letter throughout, a copy can be found at [Letter: Staffordshire and Stoke-on-Trent – GOV.UK](#). Our central message is to build on your initial work and ensure that the final proposal(s) address the criteria and are supported by data and evidence. We recommend that your final proposal(s) should use the same assumptions and data sets or be clear where and why there is a difference.

We welcome the work that has been undertaken across interim plans to develop local government reorganisation plans for Staffordshire and Stoke-on-Trent. This feedback does not seek to approve or discount any option or proposal, but provides some feedback designed to assist in the development of your final proposal(s). We will assess your final proposal(s) against the guidance criteria provided in the invitation letter and have tailored this feedback to identify where additional information may be helpful in enabling that assessment. Please note that this feedback is not exhaustive and should not preclude the inclusion of additional materials or evidence in the final proposal(s). In addition, your named area lead, Osian Morgan, will be able to provide support and help address any further questions or queries.

Summary of Feedback:

We have summarised the key elements of the feedback below, with further detail provided in the annex.

1. In some of the options you are considering populations that would be above or below 500,000. As set out in the Statutory Invitation guidance and in the English Devolution White Paper, we outlined a population size of 500,000 or more. This is a guiding principle, not a hard target – we understand that there should be flexibility, especially given our ambition to build out devolution and take account of housing growth, alongside local government reorganisation. **All proposals, whether they are at the guided level, above it, or below it should set out the rationale for the proposed approach clearly.**

2. The criteria ask that consideration should be given to the impacts for crucial services such as social care, children's services, SEND and homelessness, and for wider public services including public safety (see criterion 3). **For any options where there is disaggregation, further detail will be helpful on how the different options might impact on these services and how risks can be mitigated.**
3. The criteria ask that a proposal should seek to achieve for the whole area concerned the establishment of a single tier of local government (see criterion 1). Numerous interim plans submitted only included options covering part of the area invited to submit proposals for local government reorganisation (i.e the geography of Staffordshire & Stoke-on-Trent). **For the final proposal(s), each council can submit a single proposal for which there must be a clear single option and geography and as set out in the guidance we expect this to be for the area as a whole; that is, the whole of the area to which the 5 February invitation was issued, not partial coverage.**
4. We note that one option under consideration in the interim plan submitted by Newcastle-under-Lyme Borough Council includes the geography of Shropshire Council which sits outside of the invitation area. As noted in the invitation, it is open to you to explore options with neighbouring councils in addition to those included in the invitation. Only those councils named on the invitation can submit a proposal, but affected neighbouring councils can jointly submit with a named council. **If your final proposal(s) include a neighbouring council(s) from outside the invitation area you should clearly outline the implications of the proposal for that neighbouring council(s) and its wider area. As above, any proposal, regardless of whether a neighbouring council(s) is included, should set out a clear option and geography that covers the whole of the area to which the 5 February invitation was issued, not partial coverage.**
5. We welcome the intention across options to align local government reorganisation closely with ongoing devolution programmes. **Across all LGR proposal(s), looking towards a future Strategic Authority, it would be helpful to outline how each option would interact with a Strategic Authority and best benefit the local community, including meeting the criteria for sensible geography in the White Paper and devolution statutory tests.**
6. Numerous interim plans referenced concerns about the financial challenges being faced by Stoke-on-Trent City Council, and the viability therefore of any new unitary authority which includes within it the city of Stoke-on-Trent. **We would welcome further detail on what these challenges are and how they would be addressed under any prospective option for local government reorganisation. We note that Stoke-on-Trent City Council is in receipt of**

exceptional financial support, therefore proposals should additionally demonstrate how reorganisation will contribute to putting local government in the area as a whole on a firmer footing and what area-specific arrangements may be necessary to make new structures viable. Additionally, given the financial pressures identified it would be helpful to understand how efficiency savings have been considered alongside a sense of place and local identity.

7. We welcome steps taken to come together to prepare proposals as per criterion 4:

- a) **Effective collaboration between all councils will be crucial; we would encourage you to continue to build strong relationships and agree ways of working, including around effective data sharing. This will support the development of a robust shared evidence base to underpin final proposal(s).**
- b) **It would be helpful if your final proposal(s) use the same assumptions and data sets or be clear where and why there is a difference.**
- c) **It would be helpful if your final proposal(s) set out how the data and evidence supports all the outcomes you have included, and how well they meet the assessment criteria in the invitation letter.**
- d) **You may wish to consider an options appraisal that will help demonstrate why your proposed approach in the round best meets the assessment criteria in the invitation letter compared to any alternatives.**

Responses to specific barriers and challenges raised

Please see below our response to the specific barriers and challenges that were raised in your interim plans.

1. Engagement with MHCLG

You asked for a named official to provide support and advice as you continue with your proposals(s) for local government reorganisation. Osian Morgan has been appointed as your MHCLG point person and is ready to engage with the whole area on issues you wish to discuss further.

You also asked for opportunities to engage with MHCLG Ministers on your proposals. We are committed to supporting all invited councils equally while they develop their proposal(s). Your MHCLG point person will support your engagement with government as a whole.

2. Funding support

You raised the need for sufficient funding support to ensure the development and submission of a credible proposal(s) in November. £7.6 million will be made available

in the form of local government reorganisation proposal development contributions, to be split across the 21 areas. Further information will be provided on this funding shortly.

3. Public and partner consultation

You asked for assurance from government that appropriate public and partner consultation would be supported during the development of proposals. Expectations on engagement and consultation are in the invitation letter. We note the interim plans set out a range of engagement with stakeholders. It is for you to decide how best to engage locally in a meaningful and constructive way with residents; the voluntary sector; local community groups and parish councils; public sector providers such as health, policing and fire; and businesses to inform your proposal.

4. Timeline for LGR

You outlined existing improvement and transformation projects currently being undertaken across the area, and asked government to confirm the previously quoted April 2028 vesting day. We have set out the timelines for each area in our invitation letters to areas and in the webinar held on 3 April 2025. Following submission on 28 November 2025, it will be for the Government to decide on taking a proposal forward and to consult as required by statute. We anticipate that, on the most ambitious timelines, there could be elections to 'shadow' unitary councils in May 2027, ahead of 'go live' of new councils on 1 April 2028. Your MHCLG point person will engage further with you on the decision-making progress and timings post submission of your final proposal(s).

5. Access to other government departments

You asked us to facilitate streamlined and joined-up access to other government departments. We welcome the desire to maximise the opportunities provided through local government reorganisation, and your named MHCLG point person, Osian Morgan, will be able to support you to engage with other government departments.

6. Stable tax base

You outlined your concern that government funding reforms that significantly affect tax bases would undermine the business case you are developing. You asked that any reductions are disapplied during the periods of transition and for early engagement on the amount of government grant funding that each council would receive on day one.

Government recently consulted on funding reforms and confirmed that some transitional protections will be in place to support areas to their new allocations. Further details on funding reform proposals and transition measures will be consulted on after the Spending Review in June. We will not be able to provide further clarification on future allocations in the meantime, but are open to discussing assumptions further if we can assist in financial planning.

7. Clarity over the application of criteria set

You expressed a desire for further clarity on how government would apply the criteria it has set, in particular on population thresholds and functional economic area. We will assess your final proposal(s) against the criteria in the invitation letter. Decisions on the most appropriate option for each area will be judgements in the round, having regard to the guidance and the available evidence. We would welcome an options appraisal against the criteria set out in the letter, so you can provide an evidence-based rationale for the preferred model against alternatives.

In relation to population thresholds, as set out above and in the Statutory Invitation guidance and in the English Devolution White Paper, we outlined a population size of 500,000 or more. This is a guiding principle, not a hard target – we understand that there should be flexibility, especially given our ambition to build out devolution and take account of housing growth, alongside local government reorganisation. All proposals, whether they are at the guided level, above it, or below it, should set out the rationale for the proposed approach clearly.

ANNEX: Detailed feedback on criteria for interim plan

Ask – Interim Plan Criteria	Feedback
Identify the likely options for the size and boundaries of new councils that will offer the best structures for delivery of high-quality and sustainable public services across the area, along with indicative efficiency saving opportunities. Relevant criteria: 1c) Proposals should be supported by robust evidence and analysis and include an explanation of the outcomes it is expected to achieve, including evidence of estimated costs/benefits and local engagement. 2a-f) Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks. 3a-c) Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens.	We welcome the initial thinking on the options for local government reorganisation in Staffordshire and Stoke-on-Trent. In your final proposal(s) you may wish to consider an options appraisal against the criteria set out in the letter to provide a rationale for the preferred model against alternatives. Some of the interim plans submitted only included proposals covering part of the area invited to submit proposals for local government reorganisation. For your final proposal(s), each council can submit a single proposal for which there must be a clear single option and geography and, as set out in the guidance, we expect this to be for the area as a whole; that is, the whole of the area to which the 5 February invitation was issued, not partial coverage. Proposals should be for a sensible geography which will help to increase housing supply and meet local needs, including future housing growth plans. All proposals should set out the rationale for the proposed approach. Given the financial pressures identified it would be helpful to understand how efficiency savings have been considered alongside a sense of place and local identity. We recognise that the options outlined in the interim plans are subject to further development. In your final proposal(s) it would be helpful to include a high-level financial assessment which covers transition costs, and overall forecast operating costs of the new unitary councils. We will assess your final proposal(s) against the criteria set out in the invitation letter. Referencing criterion 1c, it would be helpful to provide: high-level breakdowns for where any efficiency savings will be made, with clarity of assumptions on how estimates have been reached and the data sources used, including differences in assumptions between proposals

	• information on the counterfactual against which efficiency savings are estimated, with values provided for current levels of spending • a clear statement of what assumptions have been made, and if the impacts of inflation are taken into account • a summary covering sources of uncertainty or risks with modelling, as well as predicted magnitude and impact of any unquantifiable costs or benefits • where possible, quantified impacts on service provision, as well as wider impacts We recognise that financial assessments are subject to further work. Referencing criteria 1 and 2, the bullets below indicate where further information would be helpful across all options: • data and evidence to set out how your final proposal would enable financially viable councils, including identifying which option best delivers value for money for council taxpayers • further detail on potential finances of new unitaries, for example, funding, operational budgets, potential budget surpluses/shortfalls, total borrowing (General Fund), and debt servicing costs (interest and MRP); and what options may be available for rationalisation of potentially surplus operational assets • clarity on the underlying assumptions for any modelling e.g. assumptions of future funding, demographic growth and pressures, interest costs, Council Tax, savings earmarked in existing councils' MTFs • financial sustainability both through the period to the creation of new unitary councils as well as afterwards • As criterion 2e states, and recognising that Stoke-on-Trent City Council has received Exceptional Financial Support, proposals should additionally demonstrate how reorganisation will contribute to putting local government in the area as a whole on a more sustainable footing, and any assumptions around what arrangements may be necessary to make new structures viable We welcome the information provided in the plans on the potential impact and opportunities for service delivery from reorganisation although we note the
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	level of detail provided varies significantly across different plans. For proposals that would involve disaggregation of services, we would welcome further details on how services can be maintained, such as social care, children's services, SEND, homelessness, and for wider public services including public safety. Under criterion 3c you may wish to consider: • how each option would deliver high-quality and sustainable public services or efficiency saving opportunities • what would the different options mean for local services provision, for example: • do different options have a different impact on SEND services and distribution of funding and sufficiency planning to ensure children can access appropriate support, and how will services be maintained? • what is the impact on adult and children's care services? Is there a differential impact on the number of care users and infrastructure to support them among the different options? • what partnership options have you considered for joint working across the new unitaries for the delivery of social care services? • do different options have variable impacts as you transition to the new unitaries, and how will risks to safeguarding be managed? • do different options have variable impacts on schools, support and funding allocation, and sufficiency of places, and how will impacts on schools be managed? • what impact will there be on highway services across the area under the different approaches suggested? • what are the implications for public health, including consideration of socio-demographic challenges and health inequalities within any new boundaries and their implications for current and future health service needs. What are the implications for how residents access services and
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	service delivery for populations most at risk? We welcome the desire to maximise the opportunity for public service reform, and it would be helpful for you to provide more details on your plans so we can explore how best to support your efforts.
Include indicative costs and arrangements in relation to any options including planning for future service transformation opportunities. Relevant criterion: 2d) Proposals should set out how an area will seek to manage transition costs, including planning for future service transformation opportunities from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects.	We welcome the commitment across plans to provide further detail on costs in final proposals. As per criterion 2, your final proposal(s) should set out how an area will seek to manage transition costs, including planning for future service transformation opportunities from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects. • within this it would be helpful to provide more detailed analysis on expected transition and/or disaggregation costs and potential efficiencies of proposal(s). This could include clarity on methodology, assumptions, data used, what year these may apply and why these are appropriate • detail on the potential service transformation opportunities and invest-to-save projects from unitarisation across a range of services - e.g. consolidation of waste collection and disposal services, and whether different options provide different opportunities for back-office efficiency savings? • where it has not been possible to monetise or quantify impacts, you may wish to provide an estimated magnitude and likelihood of impact • summarise any sources of risks, uncertainty and key dependencies related to the modelling and analysis • detail on the estimated financial sustainability of proposed reorganisation and how debt could be managed locally We note that a high-level estimate for transition costs has been provided within some interim plans. It would be helpful if detail on the councils' financial positions and further modelling is set out in detail in your final proposal(s). The interim plans ask for clarity from government on how transitional costs will be funded. As per the invitation letter, considering the efficiencies that are

	possible through reorganisation, we expect that areas will be able to meet transition costs over time from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects. We welcome the joint work you have done to date and recommend that all options and proposals should use the same assumptions and data sets or be clear where and why there is a difference (linked to criterion 1c). Lastly, we note the reference to the strategic alliance between Staffordshire Moorlands District Council in Staffordshire and High Peak Borough Council in Derbyshire. In the final proposals you should provide further information on how the transition to new local government structures through local government reorganisation would be managed for these two areas, given the additional complexities associated with the joint structures created through this alliance.
Include early views as to the councillor numbers that will ensure both effective democratic representation for all parts of the area, and also effective governance and decision-making arrangements which will balance the unique needs of your cities, towns, rural and coastal areas, in line with the Local Government Boundary Commission for England guidance. Relevant criterion: 6) New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.	We welcome the early views you have provided for councillor numbers, which we will be sharing with the Local Government Boundary Commission for England (LGBCE). We do however note that these are high-level estimates, and we welcome the commitment made to undertake further work on this in advance of November, ensuring that this work is based on best practice and examples of similarly sized unitary authorities. There are no set limits on the number of councillors although the LGBCE guidance indicates that a compelling case would be needed for a council size of more than 100 members. New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment. Additional details on how the community will be engaged, specifically how the governance, participation and local voice will be addressed to strengthen local engagement and democratic decision-making would be helpful. In your final proposal(s) we would welcome detail on your plans for neighbourhood-based governance, the impact on parish councils, and the role of formal neighbourhood partnerships and neighbourhood Area Committees.

Include early views on how new structures will support devolution ambitions. Relevant criteria: 5) - New unitary structures must support devolution arrangements. 5a) Proposals will need to consider and set out for areas where there is already a Combined Authority (CA) or a Combined County Authority (CCA) established or a decision has been taken by Government to work with the area to establish one, how that institution and its governance arrangements will need to change to continue to function effectively; and set out clearly (where applicable) whether this proposal is supported by the CA/CCA /Mayor.	We welcome that each interim plan includes early views on how new local government structures would support devolution ambitions. We note that numerous plans reference your preferred option of a Strategic Authority based on the existing geography of Staffordshire and Stoke-on-Trent. Across all LGR proposal(s), looking towards a future Strategic Authority, it would be helpful to outline how each option would interact with a Strategic Authority and best benefit the local community, including meeting the criteria for sensible geography in the White Paper and devolution statutory tests. We cannot pre-judge the result or timelines of any future devolution discussions, but we will work with you to progress your ambitions where possible in due course.
Include a summary of local engagement that has been undertaken and any views expressed, along with your further plans for wide local engagement to help shape your developing proposals. Relevant criteria: 6a-b) New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.	We note that you have highlighted the high-level engagement you have been able to undertake with partners to date, and welcome the recognition that significant further engagement will be required in advance of November. Expectations on engagement and consultation are in the invitation letter. We are happy to engage further on the consultation requirements in statute. It is for you to decide how best to engage locally in a meaningful and constructive way with residents, voluntary sector, local community groups and councils, public sector providers such as health, policing and fire, and local business to inform your final proposal(s).

	You may wish to engage in particular with those who may be affected by disaggregation of services of services. It would be helpful to see detail that demonstrates how local ideas and views have been incorporated into your final proposal(s), including those relating to neighbouring authorities where relevant.
Set out indicative costs of preparing proposals and standing up an implementation team as well as any arrangements proposed to coordinate potential capacity funding across the area. Relevant criterion: 2d) Proposals should set out how an area will seek to manage transition costs, including planning for future service transformation opportunities from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects.	We welcome the indicative costs as set out in some plans. We would welcome further detail in your final proposal(s) over the level of costs and the extent to which the costs are for delivery of the unitary structures or for transformation activity that delivers additional benefits. £7.6 million will be made available in the form of local government reorganisation proposal development contributions, to be split across the 21 areas. Further information will be provided on this funding shortly.
Set out any voluntary arrangements that have been agreed to keep all councils involved in discussions as this work moves forward and to help balance the decisions needed now to maintain service delivery and ensure value for money for council taxpayers, with those key decisions that	We welcome the ways of working together you have outlined in the interim plan, predominantly through the Staffordshire Leaders Board and the supporting Staffordshire Chief Executive Group. We note that the Supplementary Plan submitted by Stoke-on-Trent City Council and the Outline Case for a North Staffordshire Unitary Council in a Devolved System have been authored exclusively by Stoke-on-Trent City Council, and therefore has a 'city perspective', as noted in the interim plan. We welcome the desire noted to collaborate further with

will affect the future success of any new councils in the area. Relevant criteria: 4a-c) Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views.	other neighbouring councils in advance of future proposals. Effective collaboration between all councils will be crucial; areas will need to build strong relationships and agree ways of working, including around effective data sharing. This will enable you to develop a robust shared evidence base to underpin final proposals (see criterion 1c). We note that one option under consideration by Newcastle-under-Lyme Borough Council includes the geography of Shropshire Council which sits outside of the invitation area. If your final proposal(s) include a neighbouring council(s) from outside of the invitation area then significant engagement between council(s) in the invitation area with any council(s) outside the invitation area that are directly impacted would be helpful during the development of proposal(s), including through effective data-sharing. Only those councils named on the invitation can submit a proposal, but affected neighbouring councils can jointly submit with a named council. We recommend that your final proposal(s) should use the same assumptions and data sets or be clear where and why there is a difference.
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Appendix C



Local Government Reorganisation survey, Summer 2025

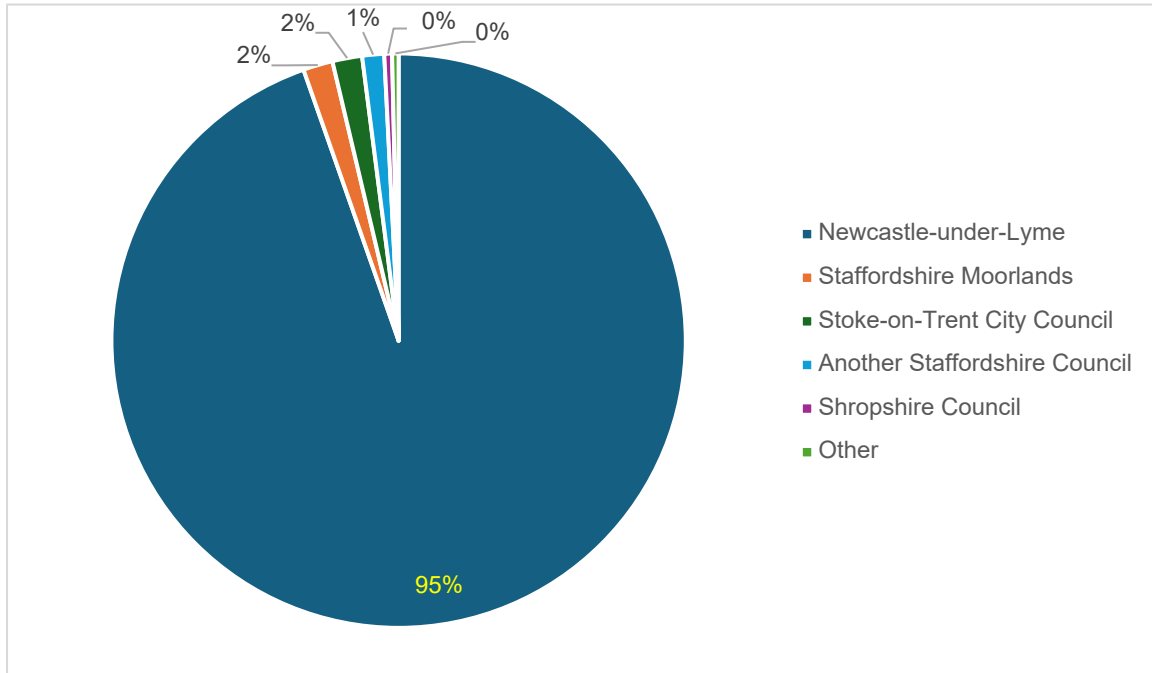
Headline findings

- There were 1,380 responses between 18 August and 16 September
 - 95 per cent were from residents of Newcastle-under-Lyme
 - 53 per cent of respondents also used services from Staffordshire County Council
- 63 per cent had contact with HWRC in the past year
 - 51 per cent with Council Tax
 - 40 per cent with Parks and Open Spaces
- Top four priorities for a new council were, by some way:
 - Keeping services that are based on local need
 - Having local councillors who are close to local issues
 - Saving money while keeping local services running smoothly
 - Keeping what makes our area special
- Top four most important themes to how services are delivered were, by some way:
 - Improved infrastructure (roads, health and schools)
 - Able to change to fit what local people need
 - Value for money
 - Delivered local
- 59 per cent want a unitary council based on the existing borders of Newcastle-under-Lyme
 - 15 per cent want a unitary covering all of Staffordshire, excluding Stoke-on-Trent
 - 12 per cent want a unitary on the existing borders of Newcastle-under-Lyme and Staffordshire Moorlands
 - 7 per cent chose 'other', most of whom favoured a North Staffordshire Authority, generally with Stoke-on-Trent and Staffordshire Moorlands and often with the northern part of Stafford Borough and East Staffordshire Borough
- 76 per cent were very concerned about LGR
- Six per cent were very confident that Local Government Reorganisation can continue to provide good public services that last and meet their needs
- 59 per cent of respondents who provided their age group were 61+
 - 10 per cent of were aged up to 40

1) Which council area do you live in and get services such as waste and recycling, planning and council tax?

A significant majority of respondents (95 per cent) lived in the borough of Newcastle-under-Lyme. Two per cent were from each of Staffordshire Moorlands and Stoke-on-Trent, with one per cent from an unnamed other Staffordshire council. Six respondents (fewer than one per cent) were from Shropshire, with three from Cheshire East, one from Manchester and one from Runnymede (Surrey).

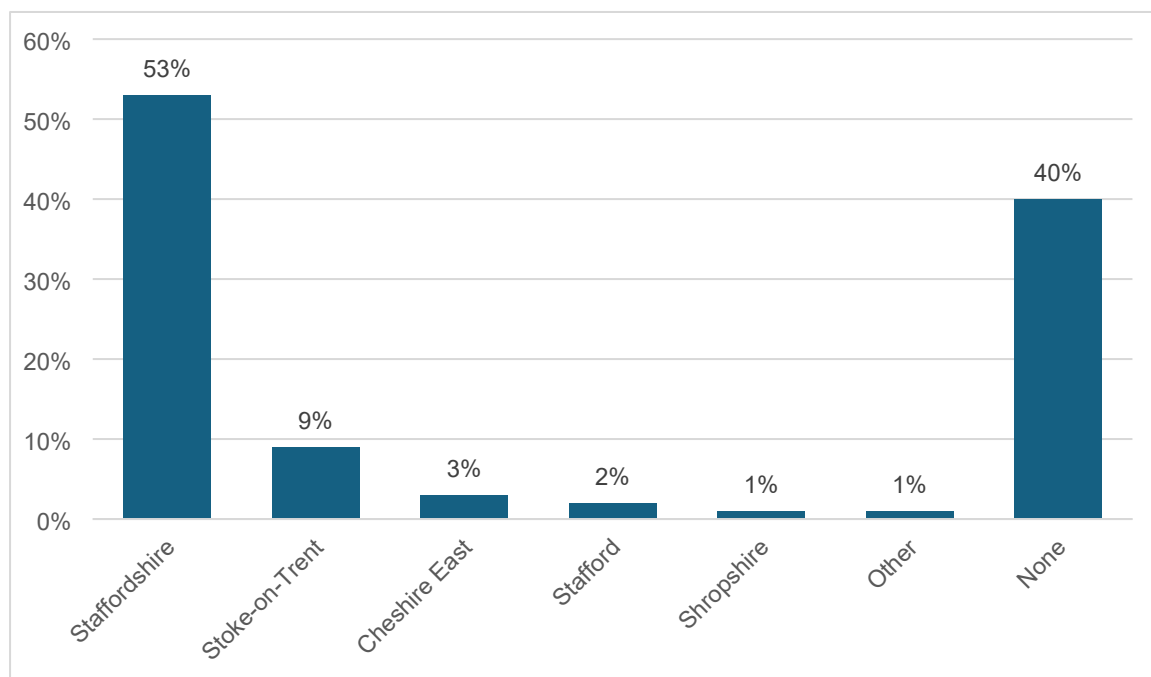
Figure 1: Which council area do you live in? 1,380 responses



2) And, if known, which other council's services do you use (for services such as libraries, schools, social care)? Please tick all that apply.

The most common response was Staffordshire County Council, with 53 per cent of respondents saying they used their services. Nine per cent used services from Stoke-on-Trent City Council, with 40 per cent not using services from any other council. Note that because respondents could tick more than one box, percentages add up to more than 100.

Figure 2: And, if known, which other council's services do you use (for services such as libraries, schools or social care?)



3) Which of the following apply to you? Please tick all that apply.

Again, as respondents could tick more than one box, percentages add up to more than 100.

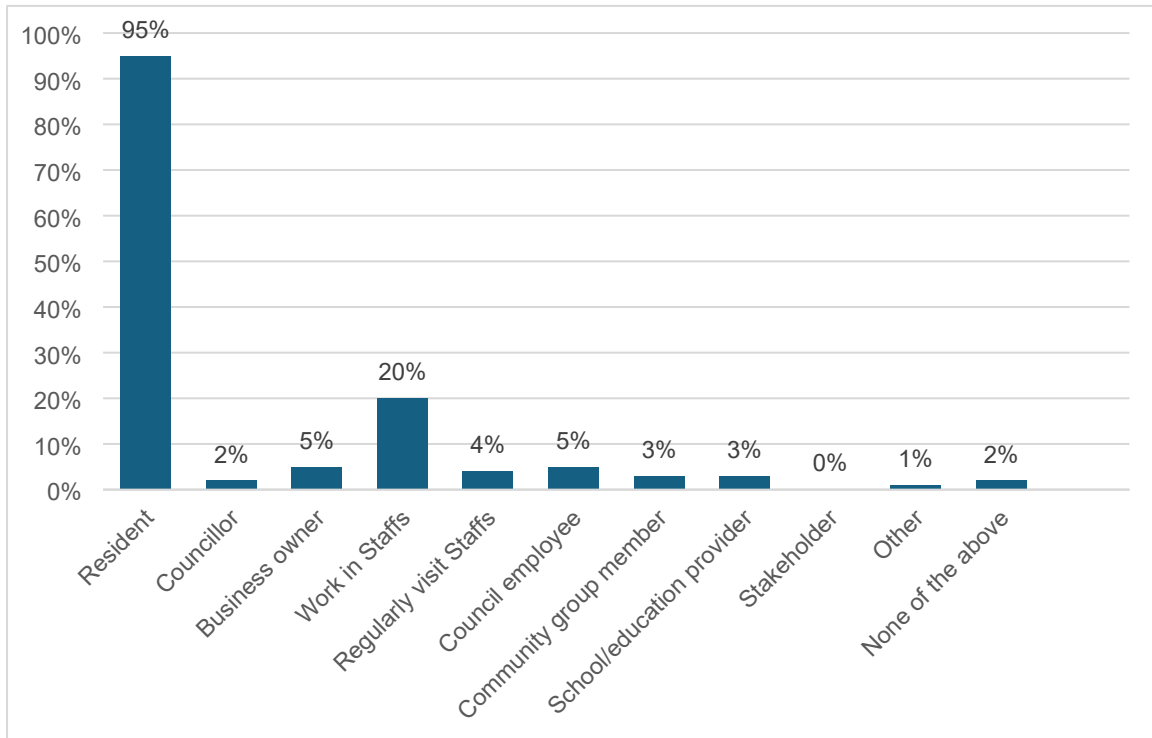
- 95 per cent described themselves as 'resident'
- 20 per cent worked in Staffordshire
- Five per cent were business owners
- Five per cent were council employees

If respondents chose 'stakeholder' or 'other', they were asked to elaborate on this, and their responses were:

- Stakeholder
 - Silverdale Scout Group
 - Kidsgrove Athletic Football Club
- Other
 - Volunteer with Audley Millennium Green Trust.
 - Retired *3
 - Grew up in Newcastle
 - I was born and brought up in Newcastle. My father and uncle were both councillors in Newcastle and Stoke. I have maintained an interest in local democracy, especially where I live (Egham, Surrey) and in North Staffs
 - Landlord
 - Volunteer at Stoke-on-Trent libraries
 - Volunteer in Staffordshire

- Concerned pensioner
- Academy Director
- I'm from the area with family still living there, I care for my mum in Audley
- In the process of moving to Knutton from Leek

Figure 3: Which of the following apply to you?

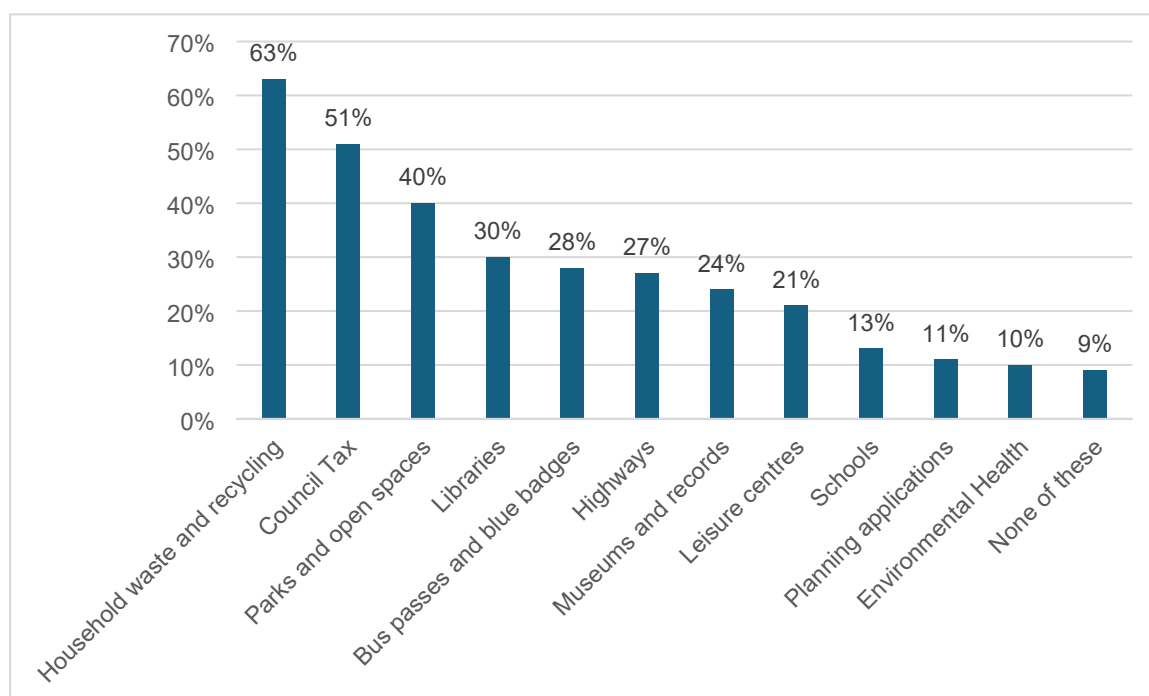


4) Which council services have you had contact with over the last 12 months? Please tick all that apply.

The most common responses were:

- Household Waste and Recycling (63 per cent of respondents)
- Council Tax (51 per cent)
- Parks and open spaces (40 per cent)
- Libraries (30 per cent)

Figure 4: Which council services have you had contact with over the last 12 months?



Respondents who answered 'other' were then asked to elaborate on their answer, and did, as follows:

- Allotments *2
- Cemeteries
- Election services *3
- Enquiries for foodbank
- Environmental
- HMCTS
- Local Councillor regarding a longstanding drug selling issue and graffiti problem - both continue to be unaddressed
- Newcastle family hub
- Parking
- Partnerships
- SCC about adored (road?) camera we need on Westbury Road, Clayton
- Sports club based at Newcastle school
- Tree maintenance

5) Thinking about the future, what would your top priorities be for a new council? Please select no more than four options.

As respondents could choose up to four options, percentages add up to more than 100.

Four responses were chosen by more than half of respondents, as the below table shows, with 'keeping services that are based on local needs' clearly the most popular choice.

Table 1: Thinking about the future, what would your top priorities be for a new council?

	% of respondents
Keeping services that are based on local needs	74%
Having local councillors who are close to local issues	67%
Saving money while keeping local services running smoothly	56%
Keeping what makes our area special	51%
Continuing local events and traditions	36%
Making sure the council has enough money	34%
Being easy to contact	31%
Having a simpler council system	16%

6) Continuing to think about a new council, what is most important to you around how services are delivered? Please select no more than four options.

As respondents could choose up to four options, percentages add up to more than 100.

Like with the previous question, four options were chosen by at least half of all respondents, with 'improved infrastructure' the most popular of all choices.

Table 2: Continuing to think about a new council, what is most important to you around how services are delivered?

	Percentage of respondents
Improved infrastructure (roads, health and schools)	63%
Able to change to fit what local people need	56%
Value for money	55%
Delivered local	51%
Services are accessible to all	38%
Listen to feedback	38%
Working better and faster	35%
Environmentally-friendly	19%

All comments are included in full in the [appendix](#), but the following word cloud shows the most common words used.

[illegible]

Respondents were given a choice of five options, and then an open comments box for other suggestions. All comments are included in full in the [appendix](#).

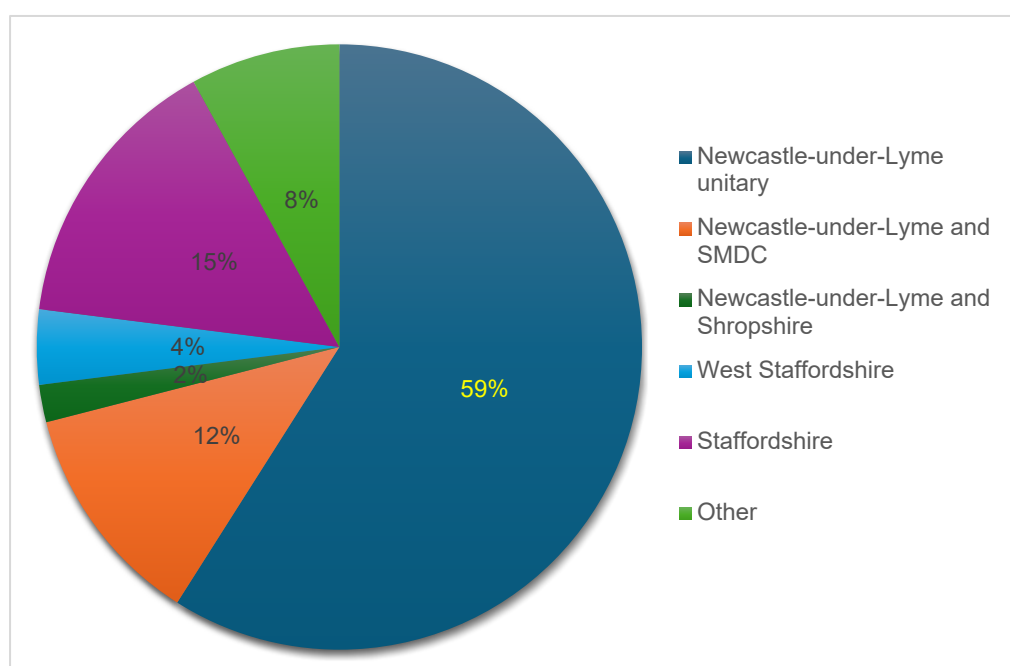
Produced by Strategic Hub, Newcastle-under-Lyme Borough Council, September 2022

unitary on the current boundaries of Newcastle-under-Lyme and Staffordshire Moorlands, with two per cent choosing a unitary with Newcastle-under-Lyme and Shropshire and four per cent opting for a West Staffordshire unitary.

There was an 'other' option, allowing respondents to suggest their own preferred geography, and this option was chosen by eight per cent of respondents. Responses were fairly straightforward to break down into a few categories.

- North Staffordshire (Newcastle-under-Lyme, Stoke-on-Trent and Staffordshire Moorlands as a minimum): 43 respondents
- A unitary based on the current borders of Newcastle-under-Lyme and Stoke-on-Trent: 19 respondents
- Leave things as they are: 12 respondents
- A unitary covering the whole of Staffordshire and Stoke-on-Trent: Eight respondents

Figure 6: Thinking about your earlier answers, what geography would you like to see for a new Council?

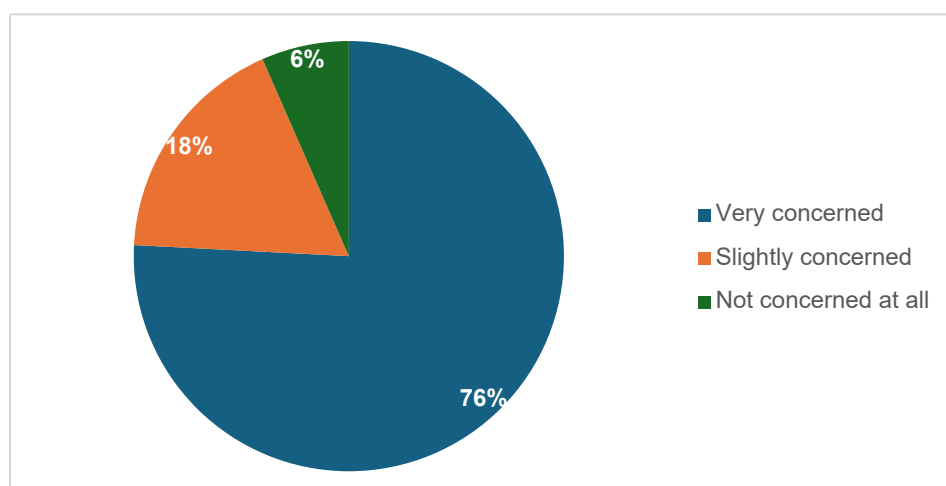


9) How concerned are you about Local Government Reorganisation?

Respondents were given three options, 'very concerned', 'slightly concerned' and 'not concerned at all'. Of these three options, the most common response, by a significant amount was 'very concerned'.

- 76 per cent were very concerned
- 18 per cent were slightly concerned
- Six per cent were not concerned at all.

Figure 7:How concerned are you about Local Government Reorganisation?



Respondents who said they were either ‘very concerned’ or ‘slightly concerned’ were then given the opportunity to respond to **‘what concerns do you have around local government being reorganised?’**. This was another open comments box with answers limited to 200 characters. Again, all comments are included in the appendix, with the following word cloud showing key themes.

Figure 8: What concerns do you have around local government being reorganised?

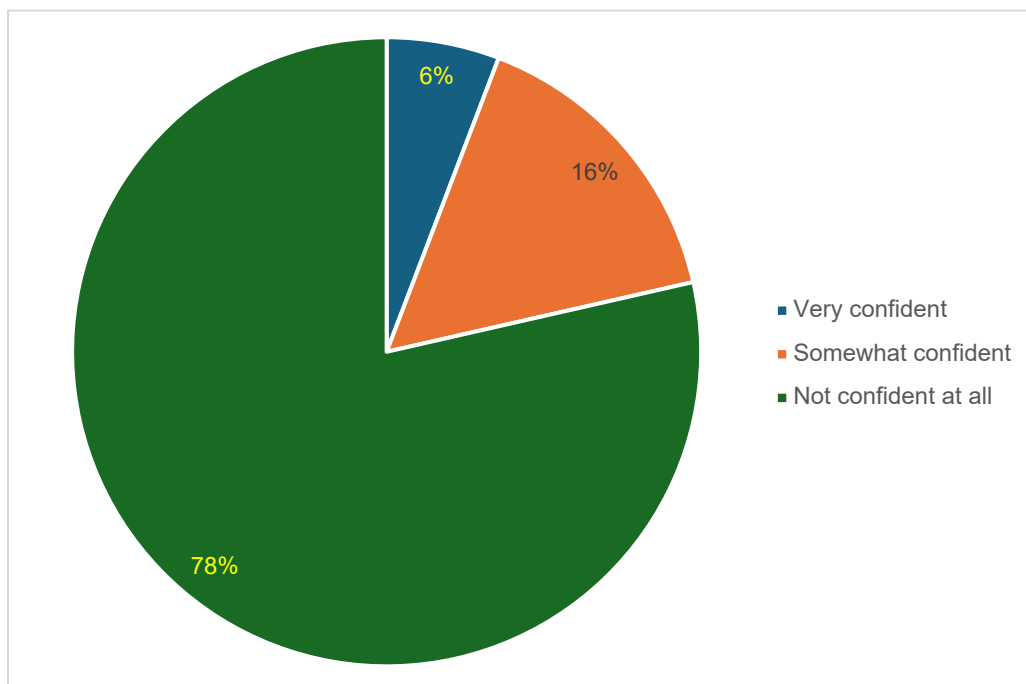


10) How confident are you that Local Government Reorganisation can continue to provide good public services that last and meet your needs?

Again, respondents were given three answers to choose from, namely 'very confident', 'somewhat confident' and 'not confident'. Responses were almost identical in proportions to the previous question:

- 78 per cent were not confident at all
- 16 per cent were somewhat confident
- Six per cent were very confident.

Figure 9: How confident are you that Local Government Reorganisation can continue to provide good public services that last and meet your needs?



11) And in a few words, what opportunities do you see around local government reorganisation?

Again, all comments are included in full in the [appendix](#) with the following word cloud showing key themes.

Figure 9: What opportunities do you see around local government reorganisation?



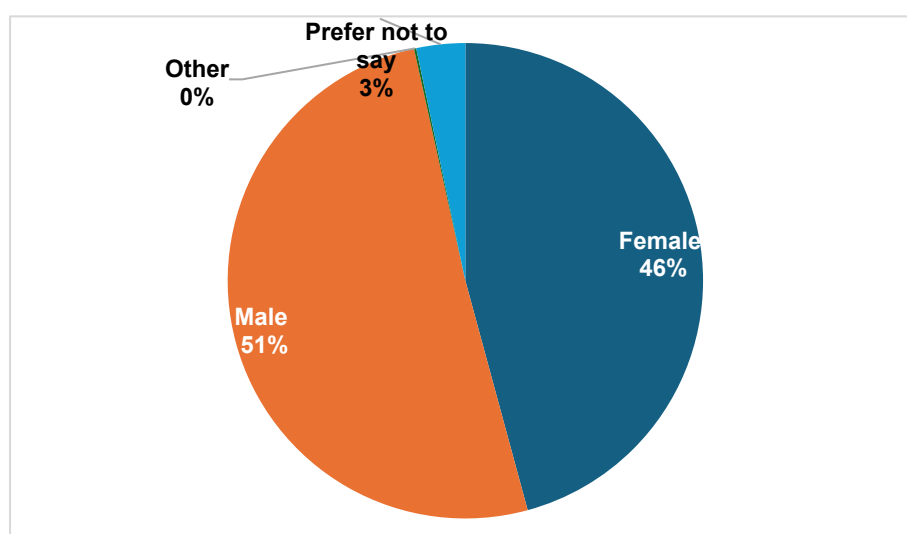
Demographics

Respondents were asked to provide some demographic information to help u see how representative they were of the borough's population.

Gender

There was a reasonable balance between females (46 per cent) and males (51 per cent), with three per cent saying either 'prefer not to say' or 'other'.

Figure 10: Gender of respondents



Age range

There were significantly more respondents from the older age groups than the younger groups. Six per cent chose not to say which age group they belonged to, and if they are removed then 59 per cent were aged 61 or above – compared to the 34 per cent of the borough's adult population they make up- with only ten per cent of responses from residents aged up to 40 despite them comprising 36 per cent of the borough's adult population.

Figure 11: Broad age bands of respondents

Age group	% of respondents	% of borough's adult (18+) population
Under 18	0%	-
18-30	3%	21%
31-40	7%	15%
41-50	12%	14%
51-60	18%	17%
61-70	29%	15%
71-80	22%	12%
80+	8%	7%

Disability

Nearly one-quarter (23 per cent) of respondents said they had a disability or long-standing illness. 69 per cent said they did not, with eight per cent preferring not to say.

Ethnicity

92 per cent of respondents identified as being white. However, if those who answered 'prefer not to say' are removed from the analysis, 98.5 per cent were

white, with 0.7 per cent Asian or Asian British, 0.6 per cent mixed and 0.2 per cent Black or Black British. According to the 2021 Census, 92.9 per cent of the borough's population was white.

Location of respondents

Asking respondents for their postcode makes it possible to see which part of the borough they live in, again to see how representative of the borough this consultation was, and it was possible to match 969 postcodes to wards. Several respondents put their postcode as just CW3 – residents of the borough who did this were allocated to the Madeley and Betley ward as almost all CW3 postcodes in the borough are in this ward. Several respondents put either ST5 or ST7, but it was impossible to allocate them to any particular wards.

There were relatively few responses from the northern wards. For example, the wards of Kidsgrove and Ravenscliffe, Newchapel and Mow Cop and Talke and Butt Lane make up 19 per cent of the borough's population. However, they only provided four per cent of the borough's respondents to this consultation. Conversely, May Bank, Thistleberry and Westlands contributed 37 per cent of the borough's respondents to this consultation but only make up 18 per cent of the borough's population.

Figure 12: Wards of respondents from the borough

Ward	% of responses	% of borough's population
Audley	7%	6%
Bradwell	7%	7%
Clayton	3%	2%
Crackley & Red Street	2%	5%
Cross Heath	4%	5%
Holditch & Chesterton	3%	4%
Keele	1%	3%
Kidsgrove & Ravenscliffe	2%	7%
Knutton	2%	2%
Loggerheads	2%	3%
Madeley & Betley	6%	4%
Maer & Whitmore	4%	2%
May Bank	11%	7%
Newchapel & Mow Cop	1%	4%
Silverdale	2%	4%
Talke & Butt Lane	1%	7%
Thistleberry	7%	4%
Town	5%	5%
Westbury Park & Northwood	7%	4%
Westlands	19%	7%
Wolstanton	6%	5%

Appendix

Q5) In a few words, what feedback or suggestions would you like to share on the services provided by your current council (for example, Newcastle-under-Lyme Borough Council)?

- A cleaner, tidy town to feel safe and more help for homeless people
- A leaflet through the door a while ago stating " What we will do", "we will collect litter from grass before we mow". Would be good if this happened
- A very well-run local council, I have no issues at this present time.
- Also, all council activity seems to stop at 3.30pm, after which you are unable to contact anyone.
- Although Newcastle council strive to keep the borough a pleasant place to live there is still issues with anti-social behaviour in and around the town, but I doubt it would improve under Stoke council
- Car parking can be difficult for those without apps or access to internet/smart phone and THEY DO STILL EXIST!
- Communication could be improved. I see lots of information on what Stoke is doing but hardly any for Newcastle. More information for social care and services/groups is needed.
- Do not change how Staffordshire is run.
- Do not want to merge with SOT we are fine as we are
- Doing a good job but need to do more
- Encouragement of local independent shops and indoor markets. Also, some free parking (or intervals) like e.g. Trentham, to help with increased footfall.
- Environmental health are slow to act on issues. Council tax department always helpful. Highways inspectors need to go to Specsavers as apparently can't find any issues. Pest control brilliant service.
- Excellent
- Excellent council with well-run services
- Excellent regular bin collections and facility to check each week the exact bins to be collected.
- Excellent service
- Extend the car park allocation for Jubilee 2 members as there is not enough parking spaces on School Street car park in the evening.
- From personal experience, although not perfect, I don't feel the services I use are too bad.
- Happy with our council as it is apart from potholes on main roads
- Happy with the currently provided services
- Hempstalls School, parents parking on the footpaths and in front of drives. You have to plan your time when coming home because you cannot get near your house. Something needs doing about it urgently

- I am completely happy with my council -Newcastle under Lyme. Any queries I have are always answered by phone, email or web site. Workers are always polite, definitely want to help. Very impressed! Thank you.
- I am disappointed that NUL council no longer offers a service to take away old white goods such as my fridge freezer. I also want the high street and small businesses given more help
- I am happy living in Newcastle-under-Lyme; I am happy with the services provided by the council.
- I am happy with the services of Newcastle under Lyme Borough Council at this present time.
- I am perfectly happy with the services provided by N-u-L Borough Council
- I don't have any major problems
- I feel the service is good on the whole.
- I have no complaints re the services provided by the local Council. On the whole I feel that Newcastle Borough Council is efficiently & effectively run whichever Party is in control.
- I only have my bin collected, no children. Can we see a reduction in tax for couples who use no other service? Parking on public roads is also abysmal. Absolute free for all and dangerous in places
- I really appreciate the regularity and dependability of the waste, garden waste and recycling services provided by NULBC
- I think Newcastle Borough Council should stay solo as I'm proud to be from Newcastle and it feels more personal than being part of a bigger community
- I think Newcastle-under-Lyme Borough Council and doing a good job at the moment when other Councils are in debt.
- I think Newcastle-under-Lyme Council should remain as it is as a unitary council would be too big to be effective. Why change a winning formula?
- I think that more people should be encouraged to be recycling. The food recycling especially should be encouraged.
- I think the current council do a good job, especially with grass cutting and refuse collection. I'd like to see the weeds removed because they're unsightly and cause infrastructure damage.
- I was born and bred in Newcastle-under-Lyme along with my whole family 5 siblings' its very rare we have any reason to cross the A500 and use any of S-O-T facilities, only Festival Park shops.
- I wish to remain independent from Stoke on Trent as I have no desire to inherit debt and their problems.
- I've had no problems. Stoke is a mess.
- It is a daft idea merging Council areas
- It takes a long time to get a reply when a problem is reported and then not always completed.
- Library and museum very good

- Litter and dog poo is a major concern along with the state of the roads. Don't visit Newcastle often due to homeless/ druggies etc
- Living in West Brampton more urgent care in chasing rogue landlords who let to drug users, resulting in poorly kept premises and anti-social behaviour
- Making Newcastle town centre safe. Free parking in town as out of town shopping is free. Encourage new businesses in town with a lower rent to start them off to encourage small independent shops.
- More of my paid council tax to be put to fixing potholes.
- Most services are satisfactory. The only thing that I disagree on is that the Borough council does not control parking enforcement in Newcastle under Lyme as there are people continually contravening
- NBC have experience of looking after residents of the borough in the interests of the people There generally is no self-interest but public duty. Sot has no overall strategy or vision for the people.
- NBC is run ok most of the time let's keep it that way
- Never had any problems with Newcastle council, on the other hand SOT council are awful, issuing fines to innocent people to get money where they can.
- Newcastle council fails to respond to contact made about park issues, street issues & telephone lines down as a result of overgrown street trees.
- Newcastle-under-Lyme Borough Council are effective in ensuring our borough provides effective services, they are concerned in caring what the opinions of the residents are.
- Newcastle-under-Lyme council is doing a great job, not getting into debt. The recycling is very good but could do with more people being educated on food waste. Not enough people bother with it.
- No feedback
- No. We need to keep services local. For example, Ball's field in May Bank. Planning permission turned down locally but overturned by County Council, in spite of food risk and other issues highlighted.
- Not enough investment in towns, new businesses and leisure into the area - lack of regeneration. The service I accessed was acceptable.
- Not to join Stoke-On-Trent
- On the whole I am entirely satisfied with the services I received from Newcastle Borough Council. My only issue is potholes which is a countrywide problem.
- Our services by Newcastle under Lyme borough council have been good.
- Overall quite happy with services provided. Potholes / damaged roads around the area need urgent attention
- Please give more access via the telephone other than relying on reporting issues through the internet, it's a complete waste of time.

- Post the re-cycling debacle with 13 diff' bins - it was daft. But here's a popular policy now. Declare Adam Jogee "Persona non Grata" and start a campaign to get rid of him preferably before 2029
- Potholes at top of my drive-reported a couple of times over the last 2 years. and would like sandy lane, Newcastle being swept more often. v busy lane now.
- Professional and effective services with prompt responses when appropriate, not passing the buck causing frustration to residents. Listening and responding to people's needs. Spending our money
- Quick and efficient service.
- Really pleased with the services of Newcastle-under-Lyme. I have lived here all my life & have always been happy with the services they supply
- Repair potholes, seen bin men put cardboard waste into the general waste, and not picking waste up that was dropped on the floor
- SEND for primary schools, household waste - we have good systems in place that shouldn't change.
- Services provided by Newcastle are good
- So far as I can tell Newcastle Borough Council does a good job, doesn't waste money and listens to communities
- State of the roads is dreadful. Bus services are inadequate. Newcastle town does not encourage one to visit.
- Straightforward website
- The area needs completely clearing up, it is very grubby and uninviting
- The carpark near my doctor's surgery no longer displays charges but only mentions a 'charges app' why it cannot still say how long is free is annoying!
- The council has always provided excellent service without going into debt. Stoke on Trent council is an absolute joke; they are always in debt. I do not want to be associated with them.
- The current council work extremely hard and efficiently. I have lived here for over 30 years and over 30 years under the Stoke on Trent Council that I do not have the confidence in.
- The idea of joining with Stoke on Trent council is silly. Stoke Council is not well run, they waste money on things like car parks, ornate structures on roundabouts. Leave Newcastle alone!
- The perception is fewer services but increasing cost to the taxpayer.
- The poor standard of roads needs to be attended to. The plan to develop Newcastle Town Centre appears to ignore the needs of the elderly and disabled.
- The recycling centre at Leycett is woefully inadequate for the size of the community it serves, and the access is at times dangerous. Urgently needs a more central, larger and better designed centre.

- The recycling including garden waste is really good. Brampton Museum is an example of the work the Borough Council have done to make it an enjoyable visit, especially the talks. Gardens are great.
- The roads have numerous potholes
- The service is excellent and thorough, and I really would not like our council to be merged with Stoke on Trent
- The services provided are excellent
- The services that I receive from Newcastle- under-Lyme Borough Council are first class, and I support the Borough 100%.
- There needs to be more availability to talk to someone
- They do a good job at present and don't want to join a bankrupt STOKE COUNCIL
- Too many reported frightening and unsafe actions taking place, speeding vehicles on minor roads. Long standing damaging road services to self and vehicle
- Trees not maintained properly, pavements in dangerous condition, grids blocked, leaves not and debris from trees not collected often enough.
- Try their best with limited resources, now early retired employee and understand the strain put on them and expectations. But in general, good job achieved with no debts unlike other city council.
- Very happy with the household waste and recycling. I think social care should not be part of the N-U-L council budget but in a separate fund.
- Very happy with the services.
- Waste collection service is excellent.
- Waste collection service offered by Our local council is excellent. The variety of things we can recycle is amazing and saves time having to recycle in stores.
- We are hoping to move to the outskirts of Newcastle under Lyme area and just wondered if there will be jobs available for my daughter who is neurodivergent and autism. What are transport options?
- We need everything local I am proud to live in Newcastle-under-Lyme i do not wish to be a resident in any way at all to Stoke-on-Trent and feel let down with the plans for ant sort of amalgamation.
- We receive a good service regarding our refuse and garden bin collections.
- What few dealings I have with NUL have all been conducted efficiently & satisfactorily.
- Whenever I require details or help, I find that our present system is OK.
- Work with local shops to rejuvenate the town centre. Too many charity shops and cafes. Nothing to come into town for. Reopen the Midway car park it is vital for disabled peoples' access to shops.
- Would like to be able to speak directly to a person. Not leave a message or e-mail and wait a reply.

Q8) In a few words, what services do you think any new council should improve to better help residents and businesses?

- A general improvement across the whole structure
- A new council should be able to adapt to local needs while preserving the individual character of its identity
- A telephone not the website for older residents
- Adult social Services
- All services
- As previous comments need increased footfall and therefore reduced business rates.
- At the moment I cannot think that any new Council could provide a service that is better than that already provided. My experience over many years is that larger & bigger inevitably results in worse.
- Awareness of local needs and responding accordingly.
- Be less officious to both the public (u need council taxpayers goodwill) & business, consider incentives to both promote & save the High St
- Better parking facilities central to the town
- Bus service in rural areas & road repairs.
- Clamping down on illegal tipping.
- Clearing drains to ensure better rainwater management
- Community policing clamp down on graffiti and littering
- Council should always consider and act upon public feedback and continue to improve infrastructure needs.
- Cut business rates so we can have more variety of shops open
- Cut business rates to encourage new shops
- Definitely have local input from local councillors I don't see what advantages there are to amalgamation-we have great services now, no need for change
- Drive community responsibility and initiatives to support value and ownership of local areas. This is cost-effective and helps councils deliver services
- Environmentally friendly, saving green space, wildlife, plants and eco system
- Fill in the POTHLES
- Finances are key, revisiting all the costs that can be saved without taking away any of the services.
- Focus on local neighbourhoods, and keeping them clean, e.g removing weeds from roads and cleaning out gutters. Also continuing keeping the town clean, e.g flowers, to boost footfall.
- For new retail shops reduce business rates
- Free parking in town centre to encourage shoppers in line with out-of-town complexes. More infrastructure i.e. roads schools and GP services in rural communities and reduce new housing until in place

- Have a monthly selection post listing what services people want prioritised. police access is hard. Make it easier
- Help for local businesses to survive by lowering council tax.
- Highways, roads are awful. Tourism and restricting bad parking in rural communities.
- I think the ability to be able to talk to local councillors is most important if there is any problem
- I think they do a great job
- I'd prefer the Council to remain as it is just Newcastle-under-Lyme
- Improve potholes
- Improve the state of roads whilst maintaining a balanced budget
- Improved road conditions i.e. Road surfaces. Maintain the current recycling and waste collection. Keeping drains free of rubbish to deflect flooding
- Improved road repair
- Improving pothole repair time. We live in a weight restriction avenue but have heavy vehicles running through on a daily basis plus speeding is a problem. No one takes any notice of our 7.5-ton limit
- Improving the state of roads in the borough
- In the area where I live it can be in some streets impossible to walk on the pavements, either due to vegetation overhanging the pavement or the very uneven surfaces, inspections and action follow-up!
- Infrastructure improvements new roads, drainage potholes etc repaired quickly
- Infrastructure.
- Investment into the town and business regeneration. The area is run down compared to how it once thrived
- Jobs near to where people live
- Keep Newcastle run by Newcastle
- Keeping hedges etc cut back to see road signs
- Listen to our feedback and concentrate on local delivery of services.
- Listening to what is important to the people in the area. The infrastructure should not be cut.
- Local issues - like cleaning out drains to prevent flooding and cleaning out weeds from the roads, keeping the town tidy and clean to boost footfall.
- Local roads
- Local schools funding if applicable and the dreaded potholes
- Lower rental fees, put money into helping existing business & need to use empty premises updated instead of putting up new units & taking away car parks
- Lower shop rents in town to keep shops open and people in work. A better bus service evenings and weekends so people can attend town events. Toilets needed by everyone when shopping attending events

- Maintain street clearing and potholes
- Make it easier for new shops and businesses to set up in Newcastle
- Make it easier for new shops to open businesses in Newcastle. Help with business rates in particular as an incentive to come to Newcastle.
- Make the cost of town centre premises more affordable to business to stop the independents leaving and attract more business. Be proud of Newcastle town and celebrate the positives.
- Mend potholes
- More new council houses should be built.
- More proactive approach to antisocial behaviour in town centre
- More regeneration. Climate considerations. Local transport that runs when we need it. More wild spaces. Local needs to mean local understands local needs. Social needs. Homeless needs.
- More schools and doctors close to where people live. Walking distance to recreation or services for non-drivers
- Not sure that a new council would be any better than what we have now. Best for services to be managed locally. Definitely would oppose the Borough being subsumed within Stoke-on-Trent.
- Our main priority is not to Join with Stoke Council. It is important that our local council continues to support residents and local businesses.
- Parking and safety of residents. Housing for local people.
- Pothole repairs. Perhaps prioritise council efficiency -> cheaper and quicker. Here's an idea, since the country is in debt, cut all council workers salary by 5% (say) -> reduce council tax.
- Potholes need to be tackled more efficiently. parking in city centres needs to be improved. If you have mobility concerns, there is not enough disabled parking near the theatre.
- Practical fully costed projects not pie in the sky wishes driven by political persuasion.
- Prompt action Less bureaucracy
- Proper maintenance of roads including lasting repair of potholes,
- Public transport, cycling facilities and off-road paths,
- Reduce business rental to make the town more attractive for business, opening the towns up again.
- Reduced parking fees would bring more people and shops into the town centre.
- Road repairs, help for special needs children, no council tax increase
- Road repairs, high street, anti-social behaviour
- Road surfaces
- Roads
- Roads
- Roads and infrastructure

- Roads are terrible. Councils do not respond to email requests or follow up on stated tasks
- Roads Looking after the area i.e. keeping trees at a reasonable level. The trees in Harrowby Drive are ridiculous
- Roads, mending potholes and footpaths. Proper separate cycleways away from traffic between villages and in towns.
- Roads, parking & public transport
- Roads repaired and also safety, with consultations with local people.
- Roads. Potholes are getting worse!!
- School provision and SEND
- Social care including for the elderly, continues to be a challenge giving the changing population demographics
- Social care. Less money spent on those unwilling to work and more spent on our ageing population.
- State of the roads, litter and unsavoury characters in town
- Stoke on Trent council is rubbish and corrupt, I do not want to be associated with stoke on Trent.
- Stop knocking down buildings, just to replace them with the same. It's not feasible. already character of Newcastle has been destroyed, with demolition of swimming baths to build monstrosity flats.
- Tend thoroughly to road damage not constant temporary refills! More police on the streets to aid safety and enforce law and order. Encourage safe, social groups for debate around community services.
- The ability to use the town centre easily
- The area needs a good clean up.
- The council should be able to respond promptly to local needs
- Tidy up verges and gutters. This area's 850 years chartered, our traditions and shops etc need to be saved and built on.
- Traffic wardens to fine owners parking on pavement
- Tree management & Highway/road management
- Value for your council tax that is a charge for very little return, becoming a bill that is unattainable.
- You could look at lowering business rates to entice more retailers into the town centre instead of building more rented accommodation.
- Youth & elderly services there are none disabled services contact SEND service is on chaos needs a review & restart. Highways need better maintenance often show entry to areas look like war zone

Q9) Thinking about your earlier answers, what geography would you like to see for a new Council?

- With SOT.
 - With Stoke on Trent
 - With Stoke-on-Trent
 - With Stoke-on-Trent
 - With Stoke-on-Trent
 - A council merged with Stoke-on-Trent
 - Stoke on Trent and Newcastle under Lyme could join, they are close to each other and a pool of resources would make sense.
 - Stoke/ Newcastle conurbation
 - I would prefer Stoke and Newcastle. It makes sense to merge with Stoke on Trent
 - It seems nonsensical to exclude Stoke-on-Trent from a unitary council. Like it or not we share so many common interests with them that we rely on a combined plan for the area
 - Newcastle and Stoke
 - The clear and obvious unit of Stoke-on-Trent and Newcastle-under-Lyme.
 - Stop trying to lump Stoke in with Staffordshire Moorlands. You're the Potteries - own it.
 - Newcastle-under-Lyme with Stoke on Trent
 - I'd love Stoke involved
 - Everything with Stoke-on-Trent
 - Clearly, we need to stop being elitist and include Stoke-on-Trent in any plan. Stoke is crucial to NUL economy and integrated development.
 - Newcastle and Stoke, with the rest of Staffordshire staying separate as they have very different needs and people
-
- North Staffordshire plus Uttoxeter and Stone, to align with the A50 corridor.
 - North Staffordshire to be of an appropriate size for a unitary authority
 - North Staffordshire Unitary
 - North Staffordshire Unitary comprising Stoke, Newcastle and Moorlands
 - North Staffordshire, any others are illogical, and do not represent the geography of the area.
 - North Staffs (Stoke, Staffs Moorlands, Newcastle plus Stone and Uttoxeter (but not rest of Stafford District or East Staffs District)); or Unit 24 from Redcliffe Maud (i.e. also Crewe Congleton)
 - North Staffs including Stoke, Uttoxeter and Stone
 - North Staffs Stoke-on-Trent, Staffs Moorlands, Newcastle under Lyme and parts of Stafford

- Where's the option for North Staffordshire? Newcastle/ Staffs Moorlands and Stoke?
- You've cynically excluded a North Staffs option with Stoke
- The practical geography would be Newcastle-under-Lyme, Staffordshire Moorlands and Stoke-on-Trent
- The proposal being worked on by Staffs Moorlands and Stoke - a north Staffordshire council
- Stoke-on-Trent, Newcastle-under-Lyme and Staffordshire Moorlands.
- Stoke-on-Trent, Newcastle-under-Lyme and Staffs Moorlands
- The common sense one - One North Staffordshire based covering conurbation with all current councils dissolved.
- Staffs Moorlands, Stoke and Newcastle seems the obvious and missing option.
- Needs to be a North Staffs option which you haven't included on here. Should include Stoke, Newcastle, Staffs Moorlands, Stafford North and East Staffs north.
- Needs to be stoke, Newcastle and moorlands in one council
- Newcastle STOKES and Staffordshire moorlands
- Newcastle Stoke on Trent and Staffordshire Moorlands
- Newcastle under Lyme and Stoke on Trent and Staffordshire Moorlands
- From Stafford north, including the Moorlands and Stoke-on-Trent
- North Staffordshire
- North Staffordshire - NUL, Staffs Moorlands and Stoke City
- North Staffordshire (Stoke, NuL, Leek, Stone)
- North Staffordshire comprising Newcastle-under-Lyme, Staffs Moorlands, Stoke-on-Trent, and East Staffs. Need Stoke-on-Trent to support loss of Staffs County for higher tier roles. I think the other suggestions are very biased against Stoke which is shortsighted.
- North Staffordshire council inc Stoke, Stone, Newcastle and Uttoxeter
- North Staffordshire encompassing Newcastle, Stoke and Moorlands. This should be an option on your list
- North Staffordshire including Stoke. Similar areas need grouping together, we have no similarities with Shropshire
- North Staffordshire is a known working geography i.e. University Hospital of North Midlands and should include Stone and Uttoxeter as a work area.
- Newcastle, Stoke-on-Trent and Staffordshire Moorlands
- A Council combined with Newcastle-under-Lyme, Staffordshire Moorlands and Stone as a new unitary responsible for all local government services.
- A greater north Staffordshire incorporating Staffs Moorlands, NUL, Stoke-on-Trent and parts of Stafford borough and East Staffs i.e. Stone and Uttoxeter. It is a fully realised and costed proper option that doesn't exclude Stoke-on-Trent on the grounds of petty prejudice.

- A North Staffordshire Authority based on Newcastle-under-Lyme, Stoke-on-Trent and Staffordshire Moorlands. Disappointed that you have not included this, obvious, option in your question.
 - A North Staffordshire council including Stoke on Trent
 - Newcastle, Stoke, Staffordshire Moorlands
 - Newcastle-under-Lyme, Stoke-on-Trent and Staffs Moorlands
 - None of the above are deliverable so why offer them as options? There should be a North Staffordshire authority, Stoke, Newcastle, Staffs Moorlands and the north of Stafford Borough and East Staffs.
 - Newcastle, Staffordshire Moorlands and Stoke-on-Trent. Should be named something other than Stoke-on-Trent to allow towns such as Newcastle, Leek and Kids Grove to retain some individual identity with equal status to the six towns of the Stoke-on-Trent.
 - Newcastle, Stoke and the Moorlands
 - Be realistic, please - Newcastle-under-Lyme, Staffs Moorlands and Stoke
 - Perhaps Stoke on Trent, Newcastle and Staffordshire Moorlands. Ideally adding Crewe as per Redcliffe Maud.
 - I have no issue with NuLBC being part of a new Council alongside Stoke-on-Trent CC. I believe that a North Staffordshire geography of NuLBC, Stoke and SMDC (with or without parts of Stone, Uttoxeter etc) makes most sense with the A50 and A53 corridors. My second choice would be a 'West Staffordshire' geography similar to what has been put forward by Staffordshire County Council recently. NuLBC becoming a unitary authority on its existing footprint does not meet any of the prerequisites of LGR, and as well as the organisation is run, this will not be a viable option to put forward to Government.
-
- Keep things as they are.
 - Leave it as it is
 - Leave it the same
 - Leave things the way they are
 - Stick with what we have
 - Remain as it is.
 - How about not messing with the current councils and not wasting all our money on needless reorganisation?
 - Can't see the point of changing, what does a mayor actually do other than add cost?
 - Keep councils as they are as Newcastle has a surplus in their accounts. Where Stoke-on-Trent council is in deficit, so if they joined Newcastle would lose its money. Because it would be pooled and there would be a loss of jobs.
 - Stay independent don't let other councils drag Newcastle down too
 - They shouldn't be united; there should be dedicated councils for local areas.

- Keep Newcastle-Under-Lyme separate.
- Single council for all of Staffordshire including Stoke-on-Trent
- One unitary including Staffordshire and Stoke on Trent
- Single unitary council for Staffordshire including Stoke-on-Trent or Single unitary council for the whole West Midlands, Staffordshire, and Warwickshire
- SINGLE STAFFORDSHIRE & STOKE AS CHESHIRE AND WARRINGTON ARE HAVING WITH VOLUNTARY LOCAL TOWN BOARDS INSTEAD OF PARISH CONCILS.
- Staffordshire and SOT. Disaggregation will be too expensive for taxpayers. As other answers will not be possible to have combination that suits everyone's views. Therefore, focus on what brings best value and how delivery model can accommodate local needs. Newcastle already very diverse so treating as one not the answer. Asking residents this question will lead to answers based on historic rivalries rather than what brings best services (as leaving the EU)
- Staffordshire and Stoke-on-Trent combined
- Staffordshire and Stoke-on-Trent makes most sense coterminous with health and police boundaries locally.
- The whole county of Staffordshire including Stoke-on-Trent and the Moorlands
- Don't mind at all as long as it works
- Anything not including Stoke-on-Trent, which is bankrupt
- Large unitary councils may not be as efficient.
- The natural area of economic and cultural activity for Newcastle-under-Lyme would include South Cheshire. Crewe, Nantwich, Sandbach are all much more familiar places for residents than any further south in Staffordshire or west to Shropshire
- This survey is centred on the western side of the county with, as usual, no thought given to the eastern side of the county, despite the large population.
- None of the above. Newcastle is too small an area, combining with Shropshire is too large and unwieldy. Ditto for West Staffordshire. Combine with Stafford possible but again too big and too far away.
- Newcastle, Stafford, Cannock Chase

Q10) In a few words, what concerns do you have around local government being reorganised?

- Access to services & Stoke sucking all the money as they have the most issues.
- Because it appears that Newcastle will be merged with Stoke and Stoke council are massively in debt
- Being able to help people who do not have internet access
- Being consumed within a larger unit, taking on their liabilities and paying more.
- Being joined with poorly running other councils will drag our level of service down
- Being merged with a council that is performing poorly and this being carried out by remote government (e.g. Walley's quarry).
- Being merged with stoke on Trent and the money not being spent well
- Being merged with the bankrupt Stoke on Trent and being merged in general with any local council which would remove the voice from local people. I don't want to lose local independence and our voice.
- Being totally selfish, I would not like to merge with Stoke-on-Trent - I feel their needs do not reflect my needs.
- Central government is deciding this without any real idea of what happens in the area as witness the Walley's landfill debacle
- concerned about loss of local control
- Cost
- Cost. Lack of strategy. Lack of local knowledge or input
- Dilution of efforts through reorganisation.
- Do not wish to join with debt ridden Stoke on Trent council
- Don't bring us down to the other council's level
- Don't change what works for political ends
- Don't want to be merged with stoke on Trent
- Finances & meeting the needs of NUL residents
- Financial issues draining our current council
- Going with Stoke council. Millions in debt and they will just swallow up Newcastle and spit us out.
- Handing it over to a council out of the area means that they will lose touch with what the people of this area require and need
- I do not want to lose the Borough of Newcastle-under-Lyme.
- I don't feel that major reorganisation bringing in non-local members to control our area, would give no benefits to the residents of Newcastle under Lyme!
- I don't want to be absorbed into a large council where Newcastle will lose out on funding. I don't want to be merged with Stoke. As Newcastle would inherit its huge financial issues. I don't want to be merged with any other council, decisions that affect NuL should be made in NuL.

- I think things will get worse
- I wish to remain a citizen of the Borough of Newcastle-under-Lyme
- I'm concerned about being part of Stoke on Trent council this is a mistake.
- If merged with Stoke on Trent City Council money will be spent on irrelevant things or not in our Borough at all
- I'm concerned about the financial aspects of any move to bring existing authorities together. I don't want to pay for Stoke on Trent's debts. We are not part of Stoke and I do not want to be.
- I'm quite happy with the way the borough is managed now. I don't like change just for the sake of 'Efficiency'. If we give up our council, how long before we lose our MP too?
- Increased cost and loss of efficiency.
- Issues local to Newcastle will become secondary to that of other areas.
- It concerns me that we may have to absorb Stoke on Trent Councils debts.
- It is clear that Stoke-on-Trent city council have complex city related issues. Newcastle would not be served well if amalgamated with them.
- It will cost me more money in council tax and provide a poorer service.
- It will not be local
- It's a Labour scheme to keep power of areas they don't always control
- Joining with S-O-T would be a disaster as they cannot run their own council let alone a bigger area.
- Lack of priority for matters which affect local people. Planning for new houses without thought about transport GP surgeries and schools causing problems for existing communities
- Larger groupings forget small and local interests. Stoke is failing I do not want any Newcastle money going into the city
- Larger is not always successful. Council mergers have been tried in the past, not successfully.
- Less local voice
- Local needs being ignored and being saddled with excessive debts.
- Loss of funding in Newcastle-under-Lyme Borough.
- Loss of unique identity
- Lots of change
- Money it costs
- More remote inaccessible services
- Need to know the financial situation of the councils merging with. Should not be expected to pick up their debt
- Newcastle BC has a proud history of self-management. Fear the Borough would lose its status, character and individuality.
- Newcastle should not lose its Royal Borough status.
- Newcastle will lose its identity.
- Newcastle works very well & should stay as it is

- Newcastle would lose its identity and control of the finances.
- Newcastle would lose its independence
- None so long as they perform well.
- Not being merged with bankrupt councils
- Not happy to join other councils that are in debt and unable to give good service
- Nothing good will come of merging Newcastle with Stoke, people i know that live in stoke say it is terrible
- One huge council for many diverse areas in Staffordshire would be impossible to Manage. Consider the difficulties now facing NHS for example.
- One large council with minimum funds
- Other councils who have overspent due to poor management now taking over NUL whom have stayed within budget. My council taxes going up to cater for other poor performing councils. WHY!!!!
- Our borough having to support another authority's deficit and being a paired of Stoke on Trent.
- Our current council is very aware of its own local problems. If we're lumped in with Stoke, our concerns go to the bottom of the pile because Stoke has got massive problems.
- Paying for losses generated in distant districts, particularly due to political dogma
- Planning- obviously no knowledge of history or don't even care.
- Reorganisation does not improve things.
- Reorganisation into a larger council area means that local issues will not be a concern unless someone on the council lives in the area and highlights issues
- Safety of existing council jobs
- Separate councils give better service for the area.
- Services will disappear example children's centres community facilities
- Spreading yourselves too thinly to deal with a larger area
- Stoke appears to be continually badly managed no matter which party is in charge.
- Stoke are in debt, we don't want to take on their debts in Newcastle
- Stoke council not as good as Newcastle
- Stoke has excessive debt which will be spread
- Stoke on Trent being broke, we don't want our services to be made worse.
- Stoke on Trent council has many problems and little money this merger would not benefit Newcastle only make it poorer
- Stoke-on-Trent's debt being incorporated into Newcastle.
- Taking on other council debts. Reduction of services for Newcastle residents
- Taking on the debts of Stoke-on-Trent council who have a different demographic and needs than Newcastle-under-Lyme

- That it will result in more high-level management which as an example LGO officer I know is already micromanaged too much incurring unwanted cost
- That our Borough will suffer as our money will be spread even thinner to accommodate Stoke's failings with their pot.
- That we will become marginalised and not equally financed. Also, that it will cause an increase in council tax, which as retirees would not be welcome.
- The allocation of money for services
- The important aspect of the ancient borough being lost and diminished, losing the area's individual history.
- The loss of the individuality of the community that it serves
- The wastage of the financial position that Newcastle under Lyme enjoys
- There is a political and aspirational difference.
- Too unwieldy and costly to organise
- Want to keep our identity. Don't think we should take on debts from Stoke on Trent
- We are a beautiful Borough and if this merge takes place residents will suffer because services will be more thinly spread as we will become bottom of the pile to city. The city is debt riddled.
- We want to stay as we are a Borough not a SOT city
- We will be forced into a merger with Stoke-on-Trent with all of their financial problems and because of their relative size they will dominate decision making for Newcastle.
- Why should we take on other bankrupt councils when we're already stretched ourselves?
- Will lose the local touch
- Won't work and cost a lot

Q12) And in a few words, what opportunities do you see around local government reorganisation?

- A possible cull of public servants - WFH says it all - there are too many unproductive people in this country with undeserved superior pensions real workers pay for.
- Better community support
- Can't see any!
- Communication
- Cost saving if done correctly, restructure, centralising of resources & slimmed down workforce.
- Do not see any opportunities. Feel it will be a backward step
- Do we get more M P's & councillors parachuted in to tell us what they think we need in our area
- Don't know
- Economies of scale can be beneficial, but I don't trust the political motivation

- Hardly any for this area. but other areas will benefit from our better financial position
- I am only confident if Newcastle stays as Newcastle. If it gets joined with Stoke-on-Trent it would be a disaster for Newcastle-under-Lyme
- I cannot see much benefit. Newcastle Borough & Staffordshire County Council do a pretty decent job. (Walleys Quarry except)
- I do not see any opportunities. Newcastle has always been debt free. Stoke-on-Trent council has always been in debt due to corruption.
- I don't see any. I do not want to be part of stoke on Trent
- I don't see any need for change. It will cost money & not increase efficiencies for people. I worked for the NHS for 50 years and reorganisation which I was affected by 5 times, never improved things.
- I don't see any opportunities, only concern and anxiety for my family and their welfare and future happiness
- I personally do not understand why it needs to be altered.
- I see no opportunities, if NuL is merged with any other council. I'll state again any decisions that affect NuL should be made in NuL and not by councillors from Stoke, etc.
- I see the borough council as better than S-o-T. But by no means perfect. Would prefer no merging
- I support pursuing opportunities for efficiencies, providing the standard of services are not affected.
- I'd prefer it to remain as it is
- If is it not broken don't fix it
- In a word 'nothing'. In fact, I think that any reorganisation will result in worse services.
- It all depends on which way it goes. If Newcastle stays as Newcastle, I am very confident. If it gets swallowed up by Stoke, I would be not confident at all.
- It could help with buying power
- I've never thought about this nor discussed it with anyone, so I don't know.
- Keep councils smaller, well organised and transparent breeds unity amongst the many. Too big and vast each voice gets smaller breeding sense of loneliness and isolation. Less personal. Automation
- Local jobs, outdoor leisure facilities walks and more schools, healthcare
- More funding for my previous improvement recommendations.
- Mostly negatives
- need more funding to revitalise the town
- New people fresh ideas
- Newcastle will be swallowed up by Stoke -on-Trent. Financial gain for Stoke at our expense.
- NO
- No obvious benefits

- No opportunities at all. Any merger would mean Newcastle loses its right to make decisions affects Newcastle itself.
- No opportunities that are not already provided
- No opportunities. Newcastle will get absorbed, services will go down (Highways already appalling)
- None
- None
- None
- None
- None
- None
- None
- none
- None
- None
- None
- None
- None
- None
- None
- none at all don't want to merge with SOT they have too much debt
- None at all other than no push back on central government once all local government ran by the same party
- None if we join Soke on Trent.
- None whatsoever
- None whatsoever
- None whatsoever. Our new county councillor appears a waste of time. So, a larger grouping will only make the situation worse
- None.
- None.
- None. Is a way for central government to cover up their failure to put an adequate funding system in place
- None. Newcastle will be lost. It's just a political thing
- Not a great deal, could be surprised
- Not a lot if we are to pick other authorities debts.
- Not a lot only more employees doing less work than at present.
- Not a lot!
- Not a lot.
- Not been informed about any
- Not much

- Not much
- Not sure
- Not sure
- Nothing comes to mind.
- Nothing obvious. 'If it ain't broke, don't fix it.'
- Nothing positive
- Nothing this government are destroying everything they touch
- Nothing, just keep the system as it is...
- only to save money, but not to improve local needs
- Possibility of reducing administration costs.
- Possible savings on duplicated services. If money were available for an integrated tram service linking the local towns and enabling residents to travel more easily.
- Redundancies
- Saving money for central government, none for the residents.
- Shropshire are better with roads could try reach their standard. parking should be made free so giving restaurants and shops better chance of survival. as more office staff would work and shop in town.
- Stoke on Trent council is very poor service.
- Streamlining administrative jobs. More multi-tasking and quicker decision making.
- Take a good look at the area, it's hardly thriving it's the council's responsibility to bring investment into the area. Please do it
- The bigger the organisation becomes, the more incompetent it gets.
- The opportunity to ensure that Newcastle and its local parish councils retain their identity and ensuring its survival.
- There are none
- There must be fairness to ensure a good standard of living for all.
- They will take away our funding like has been done around Chatterley Whitfield & Peacocks Hay area
- They would not be in touch with what is required by the residents, they would talk but not walk!
- To put every service in 1 council eradicating constant toing & froing for services better
- Too big, too clumsy, a potential vast increase in red tape, all local services being watered down none
- Too divorced from reality
- Very few
- Why do it? We in N-u-L would only have higher costs and charges caused by other councils who have not managed their finances well. Disaster awaits if this goes through.

- Why should a well-run NuL council and others join a poor performing council SOT. I can see my council tax going up to pay for other areas. I am very concerned about LGR. A rethink is needed.
- With the right mix of counties Newcastle can stay solvent, and in control.

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Ministry of Housing,
Communities &
Local Government

Rt Hon Steve Reed OBE MP

*Secretary of State for Housing, Communities
and Local Government*

2 Marsham Street
London
SW1P 4DF

To: Council leaders in England

Cc: council chief executives

12 September 2025

Dear Leader,

I am writing to you as the new Secretary of State for Housing, Communities and Local Government. I am delighted to be appointed to this role and to drive the Government's agenda of housebuilding as well as supporting and empowering local communities and local government.

I want firstly to recognise and thank you for the vital work you do in our democracy, representing your communities and delivering services that make a real difference to people's lives. Having been a councillor and council leader myself, I know first hand the importance of local democracy and ensuring that decisions are made to benefit the communities we serve.

This Government was elected last year on a clear mandate to deliver sustainable public services, devolve power and responsibility to local areas and build a country where everyone has access to a safe, secure and affordable home. I am determined to deliver on that vision.

I understand that the vital work you do requires stable and fair funding to support you to deliver critical local services. Earlier this year, we announced the £69 billion financial Settlement for 2025-26 – a 6.8% cash terms increase, with £600 million being directed through a one-off Recovery Grant. As part of the Spending Review, we announced £5 billion of new funding for local services. From 2026-27, we want to fundamentally improve the way we fund local authorities through the first multi-year Settlement in 10 years. I also look forward to enacting the Fair Funding Review 2.0, to ensure places are finally funded based on need. We will publish further detail at the provisional Settlement later this year.

Having delivered preventative reform as a council leader, I know the impact that public service reform can have in creating more effective public services that save taxpayers' money. I am really excited about the work we are doing in this space, including our partnerships with places on the Test, Learn and Grow programme and exploring more flexible funding options. We are currently developing new pilots so councils and mayors can pool budgets and do joined-up services, learning the lessons of programmes like Total Place – the last Labour government's pioneering reform programme.

The English Devolution White Paper set out our plans to support local government reorganisation swiftly and effectively. We are committed to creating strong, sustainable unitary councils that represent their communities, deliver vital public services, and improve outcomes for residents.

Delivering the largest single package of devolution in our history is central to our mission - kickstarting economic growth by putting power in the hands of local people who know their areas best. The English Devolution and Community Empowerment Bill, which had its second reading last week, will give us the means

to do this. I am enormously grateful to the former Minister of State for Local Government and English Devolution, Jim McMahon, for his work to introduce this bill to Parliament. It will create a system of 'devolution by default' and put the strengthened framework of devolved powers into primary legislation, giving mayors the levers to drive growth improve transport and create jobs. Through the Devolution Priority Programme, subject to constituent councils providing formal consent to the necessary legislation, by early 2026, we will have increased the coverage of devolution in England to 77% – or just over 44 million people.

Equally important is our mission to restore public trust in local institutions. I take my responsibility for stewardship of local government and ensuring authorities meet the highest standards of leadership and governance incredibly seriously. The English Devolution and Community Empowerment Bill proposes reforms to strengthen audit, enhance oversight, and ensure councils can better serve their communities, alongside reforms to the standards regime.

I am committed to pulling every lever to get Britain building. A vital part of our Plan for Change is the commitment to deliver 1.5 million safe and decent homes in England over the course of this Parliament. We have taken action to reform the planning system, updating the National Planning Policy Framework to prioritise brownfield land for development, restore and increase housing targets, and modernise Green Belt policy to meet the needs of our economy and local communities. We recognise the critical role that local plans play in enabling housing delivery. That is why I will continue to drive forward universal coverage of local plans as a priority. Our new plan-making system will make it faster and easier for local authorities to put plans in place.

We have already taken decisive action to unlock the homes and infrastructure our communities need. This includes the largest investment in social and affordable housing in a generation, a new National Housing Bank backed with £16 billion of financial capacity and the creation of the New Homes Accelerator. I will continue to work in partnership with councils, housing associations, developers and the wider sector to deliver the housing we need.

I remain committed to building on the work of the former Deputy Prime Minister, Angela Rayner, to reinvigorate council housebuilding. The Government has taken significant steps to increase the capacity and capability of councils to support them to once again deliver at scale notably reforming the Right to Buy, launching a new Council Housebuilding Skills and Capacity Programme and confirming a rent settlement of CPI+1% for ten years from 2026-27. I ask that you now come forward with the ambitious plans for new and innovative social and affordable housing schemes that communities need.

I am delighted to be joined by Matthew Pennycook, Alison McGovern, Miatta Fahnbulleh, Samantha Dixon, and Baroness Sharon Taylor in my ministerial team. We look forward to working with all leaders, across all parties, to deliver on these ambitions and strengthen local democracy across England.

Yours sincerely,

A handwritten signature in dark ink, reading "Steve Reed". The signature is fluid and cursive, with a horizontal line underneath the name.

RT HON STEVE REED OBE MP

Secretary of State for Housing, Communities and Local Government

NEWCASTLE-UNDER-LYME BOROUGH COUNCIL

CORPORATE LEADERSHIP TEAM'S REPORT TO

Council
19th November 2025

Report Title: Statement of Licensing Policy 2025-30

Submitted by: Service Director - Regulatory Services & Licensing Lead Officer

Portfolios: Finance, Town Centres and Growth

Ward(s) affected: All

<u>Purpose of the Report</u>	<u>Key Decision</u> Yes ☐ No ☒
To seek adoption of the draft Statement of Licensing Policy 2025-2030.	
<u>Recommendation</u> That: 1. Council endorses the decision made by Licensing & Public Protection Committee on 8th October 2025. 2. Council approves adoption of the Statement of Licensing Policy 2025-30.	
<u>Reasons</u> Under Section 5 of the Licensing Act 2003, the Council was required to revise its Statement of Licensing Policy by January 2021 and thereafter update it every 5 years. If a Council reviews their Policy within the 5-year period, then a new 5-year period begins from the date it is implemented. The policy was last approved via Urgent Decision by the Chief Executive on 18th November 2020 and subsequently approved by Council on 16 December 2020.	

1. **Background**

- 1.1 Under Section 5 of the Licensing Act 2003 the Council is required to revise its Statement of Licensing Policy by January 2021 and the revision published by 6th January 2021 and thereafter every 5 years. If a Council reviews their Policy within the 5-year period then a new 5-year period begins from the date it is implemented.
- 1.2 The existing Statement of Licensing Policy was approved via urgent officer decision by Chief Executive on 18th November 2020, due to cancellation of Council due to covid restrictions. The decision was subsequently approved by Council and therefore requires review and approval.
- 1.3 A statutory consultation took place between 20th August and 16th September 2025 during which the only response was from the Council's Environmental Health Department. The recommendations put forward were adopted into the new draft policy

document that was approved by Licensing & Public Protection Committee on 8th October 2025. A copy of the draft policy is attached as **Appendix A**.

2. Issues

2.1 As set out above.

3. Recommendation

3.1 That:

Members endorse the decision made by Licensing & Public Protection Committee on 8th October 2025

Members approve adoption of the Statement of Licensing Policy 2025-30

4. Reasons

4.1 The Council have a statutory duty to review and publish a Statement of Licensing Policy every 5 years.

5. Options Considered

5.1 No other options have been considered.

6. Legal and Statutory Implications

6.1 Under Section 5 of the Licensing Act 2003 the Council is required to revise its Statement of Licensing Policy every 5 years

7. Equality Impact Assessment

7.1 There are no impacts identified arising from this report.

8. Financial and Resource Implications

8.1 There are no impacts identified arising from this report.

9. Major Risks & Mitigation

9.1 There are risks associated with the Council not having an approved Statement of Licensing Policy as required by the Licensing Act 2003.

10. UN Sustainable Development Goals (UNSDG)

10.1



11. One Council

Please confirm that consideration has been given to the following programmes of work:

One Commercial Council: ☒

We will make investment to diversify our income and think entrepreneurially.

The Licensing service seeks to operate within the Council budgetary limits, using a positive pro-active approach which limits unnecessary costs and resource output.

One Sustainable Council: ☒

We will deliver on our commitments to a net zero future and make all decisions with sustainability as a driving principle.

All activities are undertaken with sustainability in mind, and the Council have created a 'Business Hub' document to assist businesses in action that they can take to be more sustainable.

One Digital Council: ☒

We will develop and implement a digital approach which makes it easy for all residents and businesses to engage with the Council, with our customers at the heart of every interaction.

All records in relation to Licensing are kept securely electronically and actively promote that applicants submit any application or documentation digitally.

12. Key Decision Information

12.1 This is not a key decision.

13. Earlier Cabinet/Committee Resolutions

13.1 The draft statement of licensing policy was approved at Licensing & Public Protection Committee on 8th October 2025. The current policy was approved by urgent decision by the Chief Executive on 18th November 2020 and subsequently endorsed by Full Council on the 16th December 2020.

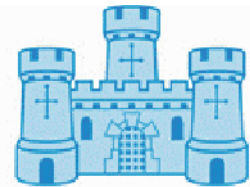
14. List of Appendices

14.1 Appendix A - Proposed Statement of Licensing Policy.

15. Background Papers

15.1 None.

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DRAFT STATEMENT OF LICENSING POLICY 2025-2030

**Adopted by Full Council on: 19th
November 2025**

**Operational start date: 19th
November 2025**

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STATEMENT OF LICENSING POLICY 2025-2030

1. INTRODUCTION

1.1 Introduction

Under the provisions of the Licensing Act 2003 (the Act), the Borough Council of Newcastle-under-Lyme (the Licensing Authority) is the licensing authority for the administration and enforcement of the above Act and associated orders and regulations within its area. The legislation regulates the licensable activities:

- The sale of alcohol by retail;
- The supply of alcohol by or on behalf of a club to, or to the order of a member of the club;
- The provision of regulated entertainment;
- The provision of late night refreshment.

1.2 Statement of Licensing Policy

Section 5 of the Act requires that the Licensing Authority prepares and publishes a Statement of its Licensing Policy every five years. The Statement of Licensing Policy must be published before the Licensing Authority carries out any function in respect of individual applications made under the terms of the Act.

1.3 Statutory Consultees

Before determining its Policy for any five year period, the Licensing Authority is required to consult with the persons specified in Section 5(3) of the Act. These are:

- The Chief Officer of Police for the area
- The Fire and Rescue Authority
- The Local Health Board
- The Local Authority with Public Health Functions
- Representatives representing local holders of premises licences and club premises certificates
- Representatives representing local holders of personal licences
- Representatives representing business and residents in its area.

1.4 Consultation with Representatives of Existing Licensees

This Statement of Licensing Policy is the sixth such statement adopted under the provisions of the Act and the Licensing Authority will consult with organisations representative of current licence holders.

1.5 Other Consultees

The Licensing Authority is empowered to consult with other bodies as it deems appropriate and this policy has been prepared after consultation with the following additional bodies:

- Borough Council Environmental Health Department
- Borough Council Partnerships TeamHome Office Immigration Department
- Newcastle BID
- Town and Parish Councils
- Staffordshire Parish Councils Association
- Staffordshire Chambers of Commerce
- All neighbouring and Staffordshire local authorities
- Local businesses including Pubs, Takeaways etc
- British Beer and Pub Association
- UK Hospitality
- Association of Convenience Stores
- Staffordshire Trading Standards
- Staffordshire County Council
- Solicitors acting for various licensed multiple retailers
- Solicitors acting for various brewery companies.
- Partnership against business crime in Staffordshire (PABCIS)

1.6 Regard to Guidance

The Licensing Authority must have regard to the guidance issued by the Home Office in discharging its functions under the Act and this Statement of Licensing Policy has been prepared taking into account that guidance. The views of all consultees have been given proper weight in the preparation of this policy document.

1.7 Period of Licensing Policy

The Statement of Licensing Policy will be used by the Licensing Authority in the administration and enforcement of its duties under the Act. It will remain in force for a period of five years and will be reviewed and subject to further consultation before the end of the five year period. A new Statement of Licensing Policy will be adopted to come into operation at the expiry of the current Licensing Policy.

1.8 Review of Licensing Policy

During the currency of any Statement of Licensing Policy, the Licensing Authority will keep the operation of the Policy under review and make appropriate revisions to ensure the effectiveness of the Policy, subject to appropriate consultation.

Minor changes would be made without consultation where:

- they are to correct an administrative error
- they are a change needed because something is no longer possible or legal
- there is no foreseeable detrimental effect to licensee's interests.

2. AIMS AND OBJECTIVES

2.1 Exercise of Responsibilities

In exercising its duties and responsibilities under the terms of the Act, the Licensing Authority will have regard to this Statement of Licensing Policy and to the guidance issued by the Secretary of State. Subject to this, all applications will be treated on their merits and judged accordingly.

2.2 The Licensing Objectives

The Licensing Authority will exercise its duties in such a way as to promote the licensing objectives set out below:

- The prevention of crime and disorder;
- Public safety;
- The prevention of public nuisance; and
- The protection of children from harm.

The Licensing Authority confirms that each objective has equal importance and that the licensing objectives will be the only considerations to be taken into account in determining applications.

2.3 Other Local Strategies

The administration and enforcement of the Act will also take into account other appropriate local strategies. The Licensing Authority has formulated its policies and procedures detailed in this Statement of Licensing Policy, taking into account the current policies incorporated into the locally adopted strategies on the following matters:

- Council Plan
- Anti-social behaviour
- Cumulative impact assessment
- Economic Development

2.4 Facilitation of Well Run Premises

The legislative powers provide for the carrying on the licensable activities in a way which ensures the licensing objectives are met and are neither detrimental to members of the public nor gives rise to loss of amenity. The Licensing Authority expects premises to be well run and managed and that licence holders take positive action with regard to their responsibility to promote the licensing objectives.

2.5 Contribution to Local Economy

The Licensing Authority recognises that the entertainment and hospitality industries are a major contributor to the local economy. There are currently some 410 premises licensed under the Act and these premises provide valuable employment opportunities as well as supporting other sectors of the economy such as shops, cultural activities and tourist attractions. The industry attracts visitors from outside the area as well as local residents and helps to create vibrant towns and communities within the Borough.

However, when considering the promotion of vibrant localities, the Licensing Authority must take account of its duty to safeguard all of the community. This duty will be a major consideration in the granting or reviewing of all licences as judged against the four licensing objectives.

2.6 Promotion of Cultural Activities

The Licensing Authority recognises the need to encourage and promote live music, dancing and theatre, circus and street arts for the wider cultural benefit of the local community generally.

2.7 Local Transport Policy

In relation to local transport policy, there will be appropriate liaison between the licensing, Police and transport authorities on all matters in relation to dispersal of people from areas where there is a concentration of entertainment premises. Such liaison is intended to ensure that the local transport plan is informed of the current needs of such areas so that the local transport strategy can be contemporaneously adapted to ensure that people are moved from such areas swiftly and safely to avoid concentrations of people which produce disorder and disturbance.

2.8 Protection of Residential Amenity

The Borough has a substantial residential population, whose amenity the Licensing Authority has a duty to protect. In some areas, local residents are adversely affected by the activities at licensed premises. Commercial occupiers of premises also have an expectation of an environment that is attractive and sustainable for their businesses. The Licensing Authority also has wider considerations in relation to the amenity of the area including littering and the fouling of public places. The Licensing Authority will determine its policies and conditions in such a way as to ensure that the Licensing objectives are actively promoted.

2.9 Trading Hours

Licensed premises will be expected to conduct their business in such a manner as not to cause nuisance or disturbance to those living or working in the locality. Trading hours will not be

regulated by geographical areas or zones, but due regard will be given to the potential for any nuisance or disturbance to be caused to those living or working nearby. In particular, where appropriate, and following relevant representation, conditions may be attached to address issues of noise, litter and light pollution, or to restrict trading hours where the premises being licensed are in the vicinity of residential accommodation.

2.10 Protection of Children from Harm

Applicants will demonstrate through their operating schedules the measures they intend to take to keep children from harm. In particular, premises where the principal licensed activity is the sale or supply of alcohol will demonstrate how they will ensure that unaccompanied children are excluded from the premises (e.g. by the requirement of proof of age cards as a condition of entry).

2.11 Illegal Sales of Age Restricted Goods

The Licensing Authority takes a very serious view of the illegal sale of alcohol and other age-restricted goods to minors and will continue to work with Staffordshire Trading Standards and Staffordshire Police to advise both the off-licence and on-licence trade on how to set up systems to avoid such sales taking place.

The Licensing Authority will expect applicants for licences to demonstrate how they will ensure that all their frontline staff have received adequate training on the law with regard to age restricted sales. They will also be expected to demonstrate in their operating schedules the measures they will take to ensure that illegal sales to children under 18 do not take place such as the checking of identification for proof of age through a secure system. (Ideally, identification should be a photo driving licence or passport, a PASS approved 'proof of age' card or a PASS approved form of Digital ID that meets the provisions within the Data (Uses and Access) Act 2025. Other forms of identification must be treated with caution because some have been shown to be insecure and open to fraud.

Additionally, the Licensing Authority encourages premises to include a Challenge 25 policy in their operating schedule, to ensure anyone who appears to be under the age of 25 provides relevant proof of age.

The Licensing Authority considers it good management practice that licensees keep registers of refused sales (refusals books) where sales of alcohol and any other age-restricted goods have been refused for any reason. Keeping such records helps to demonstrate that the responsibilities for checking the ages of purchasers are being taken seriously. Refusals books should be kept on the licensed premises and be made available

for inspection by the Licensing Officer, Trading Standards or the Police.

In premises where alcohol is not the main product sold – for example, in food retailers and corner shops – the Licensing Authority will actively encourage the use of warning messages where an electronic point of sale system (EPOS) is in use. Such a warning system can help employees as it prompts them to check the age of purchasers of alcohol or other age restricted products when they are presented at the check-out.

2.12 The Prevention of Crime and Disorder

The Licensing Authority expects licensed premises to be managed in a manner so as not to contribute to problems of crime, disorder or anti-social behaviour in the locality. Licensees will be expected to actively co-operate with initiatives to enhance community safety.

2.13 Irresponsible Drinks Promotions

The Licensing Authority commends the Portman Group's Code of Practice on the naming, packaging and promotion of alcoholic drinks. The Code seeks to ensure that drinks are purchased and promoted in a socially responsible manner and only to those who are aged 18 or over. The Licensing Authority also expects that licensees will be aware of the mandatory conditions on the premises licences that prohibit irresponsible drinks promotions from taking place.

2.14 Drugs Policies

The Licensing Authority encourages all applicants for premises licenses and club certificates to demonstrate through their operating schedules the measures they will take to address the incidence of illegal substances on their premises and to keep customers from harm.

The Licensing Authority considers it good practice for all applications for premises licences or club premises certificates for premises where alcohol will be consumed on the premises to be accompanied by a Drugs Policy which should address all the factors set out in Appendix A of this Policy and include provisions in relation to:

- Addressing the incidents, supply and consumption of drugs on the premises
- Arrangements, facilities and procedures to minimise the harmful effects of drugs
- Search procedures and procedures for detecting drugs on the premises
- Procedures for dealing with drugs found on the premises
- Procedures for dealing with those suspected of being in possession of illegal substances.

2.15 Public Safety

The Licensing Authority expects applicants to demonstrate in their operating schedules the measures they will take to promote the public safety licensing objective and protect the physical safety of people using the licensed premises. This may include any requirements as set out in the Terrorism (Protection of Premises) Act 2025, associated regulations and guidance where the premises falls into the standard or enhanced premises criteria.

2.16 Public Sector Equality Duty (PSED)

The Licensing Authority is mindful of its duties under the Equality Act 2010 and will exercise its functions under the Act in such a way as to:

- eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the Equality Act 2010;
- advance equality of opportunity between people who share and people who do not share a relevant protected characteristic; and
- foster good relations between people who share and people who do not share a relevant protected characteristic

The Licensing Authority will have regard to the relevant Government guidance on PSED when exercising its functions, particularly whether PSED needs to be applied in a decision on an application. The guidance is accessible here:

<https://www.gov.uk/government/publications/public-sector-equality-duty-guidance-for-public-authorities/public-sector-equality-duty-guidance-for-public-authorities>

2.17 Application Procedure

Where no representations are received, the application will be granted in the terms sought and no additional conditions imposed other than those which are consistent with the operating schedule.

3. THE APPLICATION PROCESS

3.1 Applications to be made in Prescribed Form

The Licensing Authority requires that all applications for the grant, variation or transfer of any premises licence, the grant of a club certificate or a personal licence detailed in the Act, are made in accordance with the statutory requirements and any guidance issued from time to time by the Licensing Authority.

All such applications must be made in the prescribed form and accompanied by the appropriate fee, where applicable, to be accepted as valid. Where such applications are statutorily required to be advertised or notified to other specified persons, the applicant must confirm that such advertisement or notification has been properly made and be accompanied by supporting evidence.

3.2 Delegations and determinations

Upon receipt of a valid application, the Licensing Authority will consider the matter and determine it in accordance with this Licensing Policy, the statutory requirements and the guidance from the Secretary of State. To assist in the speed, efficiency and cost effectiveness of the administration of the licensing process, the application will be determined in accordance with delegation criteria found within the table at Chapter 14 of the statutory guidance <https://www.gov.uk/government/publications/explanatory-memorandum-revised-guidance-issued-under-s-182-of-licensing-act-2003/revised-guidance-issued-under-section-182-of-the-licensing-act-2003-december-2023-accessible-version#statements-of-licensing-policy>

The Licensing Authority acknowledge that Licensing decisions often involve weighing a variety of competing considerations, such as the demand for licensed establishments, the economic benefit to the proprietor and to the locality by drawing in visitors and stimulating the demand, the effect on law and order, the impact on the lives of those who live and work in the vicinity, etc.

Sometimes a licensing decision involve narrow questions, such as whether noise, noxious smells or litter coming from premises amount to a public nuisance. They involve an evaluation of what is to be regarded as reasonably acceptable in the particular location. In any case, deciding what (if any) conditions should be attached to a licence as appropriate and proportionate to the promotion of the licensing objectives is essentially a matter of judgment rather than a matter of pure fact.

3.3 Operating Schedules

All applications for premises licences and club premises certificates must be accompanied by an operating schedule. This should be drawn up following a full risk assessment of the activities to be undertaken and contain the information required by the Act and associated Regulations to include a floor plan, details of the licensable activities proposed, opening hours and operating arrangements. This could include for example:

- Drinks promotion proposals
- Seating arrangements
- Drugs policy
- Security arrangements (including requirements under the Terrorism (Protection of Premises) Act 2025, known as 'Martyn's Law')
- Safety arrangements
- Maximum occupancy figure (based on risk assessment)
- CCTV arrangements inside and outside
- Staffing arrangements
- Staff training plan
- A fire risk assessment.

3.4 Use of Conditions

Where an application is received by the Licensing Authority it will be granted subject to any such conditions as are consistent with the operating schedule submitted by the applicant. This does not mean that the Authority will automatically reproduce the contents of the applicant's operating schedule. Certain conditions may be amended, if deemed appropriate by the Licensing Authority, following consultation with the applicant if required, so as to make the conditions meaningful and enforceable whilst at the same time ensuring the conditions are consistent with the operating schedule.

As an example the following condition, taken from an applicant's operating schedule, "CCTV at premises" may be amended to read:

- i) CCTV shall be installed at the premises;
- ii) The CCTV system shall be maintained and fully operational during the hours of licensable activity;
- iii) All recordings shall be available for inspection by an authorised officer.

In order to avoid such problems of interpretation it is expected that applicants will consult with Responsible Authorities prior to application or during the application process. This would also have the effect of minimising the necessity for hearings and allow for proper liaison.

An example of best practice is contained within the conditions regarding CCTV provision at the Premises.

A list of model conditions are attached as **Appendix A** governing the four licensing objectives and specific situations. Applicants are encouraged to study these conditions and enter into consultation with Responsible Authorities with a view to reaching agreement on appropriate and proportionate conditions.

3.5 Limitation on Conditions

Conditions will only be imposed to regulate matters which can be controlled by the licence holder. Such measures may be used to control the impact of the licensed activity on members of the public living, working or engaged in normal activities in the locality of the licensed premises. General anti-social behaviour of patrons in the vicinity of the licensed premises may not be able to be controlled by the licence holder but this will depend on the geography of the area and the Council expect that the licence holder will do all within their power and work with other agencies to address anti-social behaviour or other problems within the locality of the premises.

3.6 Cumulative Impact Assessment

Cumulative impact is the potential impact on the promotion of the licensing objectives of a number of licensed premises concentrated in one area. 'Cumulative impact assessments' (CIA) were introduced in the 2003 Act by the Policing and Crime Act 2017 and replaced what were known as Cumulative Impact Policies (CIP). The Council have resolved to publish a CIA which is a standalone 'live' document capable of being amended when required. The current CIA can be found here: <https://www.newcastle-staffs.gov.uk/directory-record/95609/cumulative-impact-assessment>

3.7 Other Control Mechanisms

In considering whether or not to adopt a cumulative impact assessment, the Licensing Authority will take into account its responsibilities and duties under the Licensing Act 2003. However, the Licensing Authority recognises that there are other mechanisms available for addressing problems of disorder associated with customers in the vicinity of licensed premises. Such matters would include:

- Planning controls
- Positive measures to create a safe and clean town centre environment in partnership with local businesses, transport operators and other departments of the Council
- The provision of CCTV surveillance in the town centre, taxi ranks, street cleaning and litter patrols
- Powers available to the Licensing Authority to designate parts of the area as places where alcohol may not be consumed publicly i.e. Public Space Protection Orders
- Police enforcement of general law concerning disorder and anti-social behaviour, including the issuing of fixed penalty notices
- The prosecution of personal licence holders or members of staff at such premises who sell alcohol to people who are drunk
- The confiscation of alcohol from adults and children in designated areas
- The use of Police powers to close down instantly for up to 24 hours any licensed premises or temporary event on grounds of disorder, the likelihood of disorder or excessive noise emanating from the premises
- The power of the Police, other responsible authority or a local resident or business to seek a review of the licence or certificate in question

These matters may be supplemented by other local initiatives that similarly address these problems.

3.8 Planning /Building Control

The use of any licensed premises or places (including outside areas) are subject to planning controls. This would equally affect licensable activities held under a premises licence or temporary event notice. There are several key differences between licensing and planning control. The most significant is that planning is concerned with how land is used, whereas licensing is concerned with ensuring that public safety in its widest sense is protected.

It is recommended that issues concerning planning permission be resolved before a licence application is made. The Planning Authority may make representations in respect of licensing applications particularly where the activity to be authorised would amount to a

contravention of the existing planning permissions and/or conditions imposed on planning permissions for the premises or the hours being sought exceed those authorised by any relevant planning permission.

Planning, Building Control and Licensing applications and conditions are separate. Licensing applications should not be a re-run of a planning application. Internal and external alterations to licensed premises must have building regulation approval where such approval is required under the Building Acts etc.

Where premises are being or are about to be constructed, extended or otherwise altered for the purpose of being used for licensable activities, an application may be made to the Licensing Authority for a Provisional Statement or a new grant of a licence. The Licensing Authority will determine the application in the same way as any other application for a premises licence.

3.9 Operating Hours Conditions

Where relevant representations are received, the Licensing Authority will consider restricting the hours of the licensable activity on the individual merits of the application. The Licensing Authority will take into account the overall impact the licensed premises has on the local amenity and any proposals the applicant might submit to mitigate such impact. Uniform or standardised hours of operation for premises, areas or classes of activity will not be set so that the orderly departure of customers can be aided. However, the Licensing Authority would consider the imposition of appropriate conditions to require the holders of premises licences and club premises certificates to ensure the orderly departure of their customers, particularly in noise sensitive areas. Where it is likely that significant nuisance will be caused to local residents by late night activity, a restriction on operating hours must be considered.

3.10 Sales from General Retail Premises

In relation to premises selling alcohol for consumption off the premises as part of general retail sales, there will be a presumption that that activity will be licensed to operate at all the times that the premises are open for their normal business. However, where relevant representations are received, the Licensing Authority will consider the imposition of more restrictive hours for the sale of alcohol at those premises where, for example, that activity creates a focus for disorder and disturbance.

3.11 Film Exhibitions

Where premises are licensed for the giving of film exhibitions, the Licensing

Authority will impose conditions requiring that children only be admitted to such exhibitions in accordance with the film classification as recommended by the British Board of Film Classification (BBFC). The conditions will include the requirement that the licence holder complies with the requirements of the BBFC in relation to the giving of information to the public and advertising that information. Where the Licensing Authority determine that a specific film shall be granted a film classification different to that determined by the BBFC, the licence holder will be required to comply with any additional conditions imposed by the Licensing Authority for the exhibition of that film.

3.12 Adult Entertainment

Adult entertainment is licensed under a separate licensing regime but may also require an authorisation under Licensing Act 2003 for the sale of alcohol. Normally adult entertainment will not be granted in proximity to residential accommodation, schools, places of worship or community facilities/public buildings, however all applications will be treated on their individual merits.

The licensing authority will have regard to any cumulative effect of the number of such premises in proximity to each other and in the vicinity.

Where applications are granted they will normally be subject to appropriate conditions which promote the licensing objectives including:

- Control of access for children. There is no reason for proof of identity to be confined to those who appear to be under age 18. The Authority may require proof of identity, if appropriate, for anyone appearing under 25
- Exterior advertising/visibility
- Avoiding Contact, including a 'one metre' rule
- Performances confined to stage or other means of segregation
- Performances in place giving direct access to dressing room without passing through audience
- Style of dancing, e.g. no audience participation, physical contact between performers, simulated sex acts etc.
- Management standards, including CCTV inside and out, levels of door and floor supervision, waitress service only
- Rules of club conveyed to performers and audience
- Applicants should state clearly whether their application involves nudity, striptease, sex related or adult entertainment.

3.13 Personal Licences

Personal licences will be granted in accordance with the Act. All applications must be made in the prescribed form and be accompanied by the relevant documentation.

4. MEASURES TO PROMOTE THE LICENSING OBJECTIVES

4.1 Public Safety

Conditions will be imposed in accordance with operating schedules and any relevant representations to protect public safety including, where justified, measures to address the following:

- Fire safety;
- Ensuring appropriate access for emergency services such as ambulances;
- Good communication with local authorities and emergency services, for example communications networks with the police and signing up for local incident alerts;
- Ensuring the presence of trained first aiders on the premises and appropriate first aid kits;
- Ensuring the safety of people when leaving the premises (for example, through the provision of information on late-night transportation);
- Ensuring appropriate and frequent waste disposal, particularly of glass bottles;
- Ensuring appropriate limits on the maximum capacity of the premises; and
- Considering the use of CCTV in and around the premises (this may also assist with promoting the crime and disorder objective).

4.2 Prevention of Public Nuisance

In determining applications for new and varied licences, regard will be had to the location of premises, the type and construction of the building and the likelihood of nuisance and disturbance to the amenity of nearby residents by reason of noise from within the premises, or as a result of people entering or leaving the premises, or by reason of smell, vibration or light pollution.

Installation of sound limiting equipment and sound insulation may be required to minimise disturbance to the amenity of nearby residents by reason of noise from the licensed premises.

4.3 The Protection of Children from Harm

Premises licences are granted to a wide variety of establishments for a wide variety of activities regulated under the Act. For the majority of these activities, the presence of children either on their own or accompanied by a responsible adult is not unlawful. The Licensing Authority will not ordinarily impose a condition requiring that children not be admitted to licensed premises. Such a matter will generally be at the discretion of the licence holder. However, in some instances the licence holder will need to restrict the access of children to the premises or parts of the premises at certain times when specific activities are taking place. The applicant is required to detail in the operating schedule the measures they intend to take to meet the licensing objective of 'protecting children from harm'.

Where relevant representations are received, the conditions that may be attached to a

licence to protect children from harm include the following:

- Limitations on the hours when children may be present
- Limitations on or the exclusion of the presence of children under certain ages when particular specified activities are taking place
- Limitations on the parts of premises to which children may be given access
- Age restrictions (below 18)
- Requirements for children to be accompanied by an adult (including, for example, a combination of requirements which provide that children under a particular age must be accompanied by an adult)
- Full exclusion of people under 18 from the premises when any licensable activities are taking place

Activities Giving Rise to Concern

The activities which would give rise to concern by the Licensing Authority in relation to potential harm for children include:

- adult entertainment is provided;
- a member or members of the current management have been convicted for serving alcohol to minors or with a reputation for allowing underage drinking;
- it is known that unaccompanied children have been allowed access;
- there is a known association with drug taking or dealing; or
- in some cases, the premises are used exclusively or primarily for the sale of alcohol for consumption on the premises.

Role of the Director of Children and Lifelong Learning

The Licensing Authority recognises that the Director of Children and Lifelong Learning for the County Council is the responsible authority for advising the licensing authority on all those matters in relation to the licensing objective to protect children from harm. Applicants are specifically required to forward copies of their operating schedule to Staffordshire Trading Standards so that the Licensing Authority may be advised on the suitability and the effectiveness of the applicant's proposals to meet the licensing objective of 'protecting children from harm'.

4.4 Prevention of Crime and Disorder

Conditions will be imposed in accordance with operating schedules and any relevant representations to address the following:

- Radio links Door supervision
- The provision of CCTV
- Maximum permitted numbers
- Bottle bans and use of plastic containers/toughened glass
- Restriction of drinking areas/removal of open containers
- Proof of age cards
- Drugs policies
- Signage
- Adoption of a dispersal policy

- Search on entry
- Overcrowding
- Chill-out facilities
- Pub Watch/Off Licence Watch where such a scheme exist

5. ENFORCEMENT

5.1 Enforcement Policy

The Licensing Authority recognises that efficient and effective enforcement is of paramount importance in ensuring that the objectives of the Act are met. The Licensing Authority will follow the principles outlined in the Council's Enforcement Policy - <https://www.newcastle-staffs.gov.uk/directory-record/28/environmental-health-enforcement-policy>

5.2 Protocols with other Agencies

The Licensing Authority also recognises that there are other enforcement and regulatory agencies who have a direct involvement with the matters detailed in the Act. Protocols and understandings have been agreed with those agencies and they will be reviewed in the light of experience to ensure that transparent and effective enforcement procedures are operated in relation to the legislative requirements.

5.3 Duty to Promote the Licensing Objectives

Where anti-social behaviour or other public disturbance occurs in connection with or in the vicinity of licensed premises, the Licensing Authority will work with other enforcement agencies and other bodies to identify the causes of such events and identify any possible remedies. It is recognised that it is the Licensing Authority's duty to promote the licensing objectives in the interests of the wider community, and to work with the Police and other law enforcement agencies to deter criminal activities and to take appropriate enforcement action. There will therefore be a sharp and proactive focus on premises failing in terms of the licensing objectives.

6. PERMITTED TEMPORARY ACTIVITIES

6.1 Temporary Event Notices

Anyone wishing to hold an event at which any licensable activity will take place may give notice of the event (a temporary event notice) to the Licensing Authority not less than 10 working days before the holding of the event, or 9 to 5 working days if submitting a Late Temporary Event Notice. A copy of the notice must also be given to the Police and Council Environmental Health Department at the same time.

A “working day” is any day other than a Saturday, Sunday, Christmas Day, Good Friday or a bank holiday.

6.2 Limitations

The following limitations apply:

- An individual (other than a personal licence holder) may give a temporary event notice 5 times a year
- A personal licence holder may give a temporary event notice 50 times a year
- A notice may be given 15 times per year in relation to any premises
- A temporary event may last up to 168 hours
- There must be a minimum of 24 hours between events
- The maximum duration of all temporary events at any individual premises in one year is 21 days
- The maximum number of people attending a temporary event at any one time is 499.

In any other circumstances, premises licence or club premises certificate will be required.

Where a temporary event notice has been given, no authorisation is required for the temporary carrying on of the sale or supply of alcohol, the provision of regulated entertainment or the provision of late night refreshment at premises where there is no premises licence or club premises certificate.

The Police and Council Environmental Health Department have the right to object to a temporary event notice within 3 working days of receiving the notice. Should an objection be made then the Licensing Authority will hold a hearing to consider the Police or Environmental Health Department objection and decide whether or not to issue a counter notice setting out conditions which must be met if the event is to be held, at least 24 hours before the beginning of the event. There is no hearing if the objection relates to a late Temporary Event Notice.

6.3 Public Safety

Those holding permitted temporary activities are reminded of the need to have proper regard for the safety of those attending the event, to have respect for the concerns of local

residents and the need to prevent crime and disorder and anti-social behaviour by those attending.

7. CONTACT DETAILS

Further details for applicants about the licensing and application process, including application forms, can be found by contacting the Licensing Department, Castle House, Barracks Road, Newcastle, Staffordshire, ST5 1BL.

Telephone: 01782 717717

Email: licensing@newcastle-staffs.gov.uk

Advice and guidance to applicants may also be sought from the Responsible Authorities at:

<https://www.newcastle-staffs.gov.uk/alcohol-entertainment-licences/responsible-authorities>

APPENDIX A

Licence Conditions

The Licensing Authority notes that where a "relevant representation" is made the Act makes provision for the attachment of conditions to licences granted under its scope. Conditions may include limitations or restrictions to be applied to the use of the licence, or licensed premises.

It is not, however, intended that conditions should be used to restrict licences unnecessarily and conditions will only therefore be imposed where it is considered appropriate in the public interest to promote the licensing objectives.

Conditions will be tailored to fit the individual application having regard to any representations received. To this end, the Licensing Authority will work closely with other agencies to focus licence conditions to ensure that expected standards are met and that risks to amenity and Public order are kept to a minimum.

This will ensure that those voluntarily exercising the highest levels of management over licensable activities will be afforded sufficient flexibility to maximise business interest and provide a lead on standards of excellence within the industry with the prospect of increasing public access to well regulated entertainment.

A pool of conditions and the circumstances in which these may be used are listed below. Specific conditions may be drawn from these and tailored to the circumstances of a licence. This is not an exhaustive list and the Licensing Authority may apply other conditions not included in this pool if it is considered that these would be more appropriate in the granting of a licence.

POOL OF CONDITIONS FOR LICENCES

Conditions Relating to the Prevention of Crime and Disorder:

It should be noted in particular that it is unlawful under the 2003 Act:

- to sell or supply alcohol to a person who is drunk
- to knowingly allow disorderly conduct on licensed premises
- for the holder of a premises licence or a designated premises supervisor to knowingly keep or to allow to be kept on licensed premises any goods that have been imported without payment of duty or which have otherwise been unlawfully imported
- to allow the presence of children under 16 who are not accompanied by an adult between midnight and 5am at any premises licensed for the sale of alcohol for consumption on the premises, and at any time in premises used exclusively or primarily for the sale and consumption of alcohol.

Conditions enforcing these arrangements are therefore unnecessary.

General:

When applicants for premises licences or club premises certificates are preparing their operating schedules or club operating schedules, when responsible authorities are considering such applications and when licensing authorities are considering applications following the receipt of any relevant representations from a responsible authority or interested party, the following options should be considered as measures which, if appropriate, would promote the prevention of crime and disorder.

Whether or not conditions are appropriate in the individual circumstances of any premises will depend on a range of factors including the nature and style of the venue, the activities being conducted there, the location of the premises and the anticipated clientele of the business involved. It should also be borne in mind that

club premises are expected to operate under codes of discipline to ensure the good order and behaviour of members.

Necessary conditions for the licence or certificate will also depend on local knowledge of the premises.

Any individual preparing an operating schedule is at liberty to volunteer any measure, such as those described below, as a step he or she intends to take to promote the licensing objectives. When incorporated into the licence or certificate as a condition, they become enforceable under the law and a breach of such a condition could give rise to prosecution.

Radio Links:

Radio links connecting premises licence holders, designated premises supervisors and managers of premises/clubs to the local Police can provide for rapid response by the Police to situations of disorder which may be endangering the customers and staff on the premises.

Such systems can provide two-way communication, both enabling licence holders, managers, designated premises supervisors and clubs to report incidents to the police, and enabling the police to warn those operating a large number of other premises of potential trouble-makers or individuals suspected of criminal behaviour who are about in a particular area. These systems can also be used by licence holders, door supervisors, managers, designated premises supervisors and clubs to warn each other of the presence in an area of such people.

An example of conditions that may be applied include:

Designated premises will install and use appropriate radio links and shall ensure:

- that systems are fully operational and switched on
- that two way radios are monitored by a responsible member of staff
- that all instances of crime and disorder are reported without delay via the 999 system if applicable and the nite-net radio system and Police instructions acted upon
- that text pagers and radio links are maintained between premises and to the Police or other agencies as appropriate.

Where appropriate, conditions requiring the use of radio links may be applied.

Door Supervisors:

Conditions relating to the provision of door supervisors and security teams are valuable in:

- preventing the admission and ensuring the departure from the premises of the drunk and disorderly, without causing further disorder;
- keeping out excluded individuals (subject to court bans or imposed by the licence holder);
- searching and excluding those suspected of carrying illegal drugs, or carrying offensive weapons; and
- maintaining orderly queuing outside of venues prone to such queuing.

Where door supervisors conducting security activities are to be a condition of a licence, which means that they would have to be registered with the Security Industry Authority, conditions may also need to deal with the number of such supervisors, the displaying of name badges, the carrying of proof of registration, where and at what times they should be stationed on the premises, and whether at least one female supervisor should be available (for example, if female customers are to be the subject of body searches).

Door supervisors also have a role to play in ensuring public safety.

Examples of the type of conditions that may be applied include:

The Licensee must ensure that a written log is kept that:

- details persons working as door supervisors
- details dates, times when supervisors are on/off duty
- records the full name and SIA registration of the supervisor
- records the address and telephone number of the supervisors working at the premises
- covers a period of a minimum of two years and is available for inspection by the Police or relevant enforcement agency.

In respect of commercial premises with a capacity of 200 or more:

- there must be at least two door staff at each point of entry into the premises and one on each exit point (except emergency exits)
- staff must be in place by 8pm at the latest
- all door supervisors must display their SIA ID card
- all door staff must have ready access to details of local hackney carriage/private hire companies, including telephone numbers, on a leaflet/card or similar that is available to customers on request
- consideration be given whether at least one female door supervisor should be available (for example if female customers are to be the subject of body searches).

Where appropriate, conditions relating to the use of door supervisors may be applied.

Any person employed as a door supervisor or engaged as a door supervisor must be registered and licensed by the Security Industry Authority.

Bottle bans:

Bottles may be used as weapons inflicting serious harm during incidents of disorder. A condition can prevent sales of drinks in their bottles for consumption on the premises. However, many women consider drinking from bottles to be safer as it is easier for them to prevent the spiking of drinks with drugs in bottles, the openings of which may be readily covered. It should also be noted that it is perfectly legitimate for couples, etc. to order a bottle of wine as their drink of choice without food being ordered with this. These issues therefore need to be carefully balanced, and will be considered in assessment of whether and what conditions relating to bottles should be applied.

Examples of conditions that may be applied include:

- No person carrying open bottles or other drinking vessels will be allowed admission to the premises
- No persons carrying closed bottles will be allowed access to the premises where there is a realistic likelihood of the contents being consumed on the premises
- To utilise glass collectors within the premises on a timed rota, e.g. glasses and bottles to be collected routinely at 30 minute intervals
- No drink will be supplied in a glass bottle for consumption on the premises
- No person shall be allowed to leave the licensed area of the premises with open containers of alcohol.

Separate conditions may be applied to differing parts of premises e.g. where food is served.

In particular areas during specific events, for example live sporting events being broadcast from a premises, or where intelligence exists with regard to the likelihood of crime and disorder within an area, then bottle bans will be imposed and the use of plastic or toughened glass containers required.

Where appropriate, conditions relating to the use of bottle bans may be applied.

Plastic containers and toughened glass:

Glasses containing drinks may be used as weapons during incidents of disorder and in normal form can cause very serious injuries. Consideration will therefore be given to conditions requiring either the use of plastic containers or toughened glass that inflicts less severe injuries. Location and style of the venue and the activities carried on there would be particularly important in assessing whether a condition is appropriate. For example, the use of glass containers on the terraces of outdoor sports grounds may obviously be of concern, but similar concerns may also apply to indoor sports events such as boxing matches. Similarly, the use of such plastic containers or toughened glass during the televising of live sporting events, such as international football matches, when high states of excitement and emotion fuelled by alcohol might arise, may be an appropriate condition.

An example of such a condition would be:

- For the period a premises is open to the public on a day that a live sporting event is broadcast in the premises, all drinking vessels supplied for use must be plastic or of toughened glass composition

In particular areas during specific events, for example live sporting events being broadcast from a premises, or where intelligence exists with regard to the likelihood of crime and disorder within an area, then bottle bans will be imposed and the use of plastic or toughened glass containers required.

It should be noted that the use of plastic or paper drinks containers and toughened glass might also be relevant as measures to promote public safety.

Where appropriate, conditions relating to plastic containers and toughened glass may be applied.

CCTV:

The presence of CCTV cameras can be an important means of deterring and detecting crime at and immediately outside licensed premises. Conditions should not just consider a requirement to have CCTV on the premises, but also the precise siting of each camera, the requirement to maintain cameras in working order, and to retain recordings for an appropriate period of time.

The Police should provide individuals conducting risk assessments when preparing operating schedules with advice on the use of CCTV to prevent crime.

Where CCTV is required as a necessity on one of the four licensing objectives, following a relevant representation made by a relevant body, then an example of the protocol conditions that may be applied include:

- There shall be CCTV installed at the premises
- The CCTV system shall be maintained and fully operational during the hours of licensable activity and when premises are open to the public
- There shall be at least one camera situated internally at the premises and at least one camera situated externally showing the main entrance/exit of the premises.
- The premises licence holder shall liaise with Staffordshire Police Service's Architectural Liaison Officer concerning any changes to the siting and viewable areas of the CCTV cameras
- Where this premises licence authorises the sale of alcohol after 00.00 hours, the external camera shall be in operation during the hours of licensable activity and for the period when the premises are open to the public
- The CCTV system shall be capable of producing and storing recordings for a minimum period of 28 days on a rolling basis
- The recordings produced shall be made available in a removable format for inspection/retention by any police constable and Authorised Officers of the local authority
- Upon written request for such recordings, the licensee and Licensing Authority shall keep a copy of the recording for a period of 6 months
- The premises licence holder shall ensure that any CCTV system

installed at the premises meets the required standards as advised by Staffordshire Police's Architectural Liaison Officer ("the Officer").

Such standards shall include:

- a. That colour images are produced
- b. That stills can be taken from the footage and stored for inspection by authorised officers
- c. That the resolution of the images record/produced meets the minimum standard as set by the Officer from time to time.

Home Office approved CCTV systems to be installed and registered in accordance with guidelines laid down by the Information Commissioner.

Open containers not to be taken from the premises:

Drinks purchased in licensed premises or clubs may be taken from those premises for consumption elsewhere. Where premises are licensed for the sale of alcohol for consumption off the premises then this is entirely lawful. However, consideration should be given to a condition preventing the taking of alcoholic and other drinks from the premises in open containers (e.g. glasses and opened bottles). This may again be appropriate to prevent the use of these containers as offensive weapons in surrounding streets after individuals have left the premises.

Where appropriate, conditions relating to these matters may be applied.

Restrictions on drinking areas:

It may be appropriate to restrict the areas where alcoholic drinks may be consumed in premises after they have been purchased from the bar. An example would be at a sports ground where the Police consider it appropriate to prevent the consumption of alcohol on the terracing of sports grounds during particular sports events. Such conditions should not only specify these areas, but also indicate the circumstances in which the ban would apply and times at which it should be enforced.

Where appropriate, conditions relating to these matters may be applied.

Capacity limits:

It is expected that, if relevant, a safe capacity limit for each licensed premises will be submitted by the applicant as part of their operating schedule and licence application. It will be the responsibility of the applicant to state how they have arrived at this number, and how they will satisfy the licensing objectives at this limit. This is usually done by carrying out a Fire Risk Assessment.

In determining the extent to which capacity limits are appropriate to a premises the Licensing Authority will have reference to the Fire Service.

A suggested condition is: The maximum number of persons permitted within the premises shall be determined by reference to the lower figure of surface area of the premises, CCTV provision and size of escape routes as notified by the Fire Safety Officer.

Proof of age:

It is unlawful for children under 18 to attempt to buy alcohol just as it is unlawful to sell or supply alcohol to them. To prevent such crimes, there is a mandatory condition attached to every premises licence detailing that there must be a policy on verifying an individual is over the age

of 18. This should not be limited to recognised "proof of age" cards, but allow for the production of other proof, such as photo-driving licences, passports, or digital equivalents that have been approved by the Home Office.

To assist in ensuring that only persons over the age of 18 are able to purchase alcohol, then the Challenge 25 Scheme may be applied.

An example of such conditions would be:

- Where any person appears to be under 25 they must be asked to prove they are 18 or over
- The premises will make available leaflets/application forms explaining how appropriate proof of age ID may be obtained.

Where appropriate, conditions relating to proof of age may be applied.

Crime prevention notices:

It may be appropriate at some premises for notices to be displayed which warn customers of the prevalence of crime, which may target them. Some premises may be reluctant to volunteer the display of such notices for commercial reasons. For example, in certain areas, a condition attached to a premises licence or club premises certificate may require the displaying of notices at the premises which warn customers about the need to be aware of pickpockets or bag snatchers, and to guard their property. Similarly, it may be appropriate for notices to be displayed which advise customers not to leave bags unattended because of concerns about terrorism. Consideration could be given to a condition requiring a notice to display the name of a contact for customers if they wish to report concerns. Similarly, notices requesting that customers leave quietly and in an orderly manner may be appropriate.

Where appropriate, conditions relating to these matters may be applied.

Signage:

In order to assist in appropriate enforcement and regulation of the Act the Licensing Authority will expect the signage at all licensed premises to prominently display licence details, licensable activity, hours of licensable operation, the names of the licence holder and designated premises supervisor for the premises, capacity limits and other relevant matters such as the policy relating to the admission of children. Such signage should also be visible to the public before they enter the premises.

Conditions may be applied requiring observation of this expectation.

Drinks promotions:

Standardised conditions will not be attached to premises licences or club premises certificates that promote fixed prices for alcoholic drinks. Conditions tailored to the individual circumstances of particular premises that address irresponsible drinks promotions may be

appropriate and appropriate for the promotion of the licensing objectives. Similarly it may be appropriate to require that adequate notice of the nature and duration of drinks promotions is made available to the Police in advance of the promotions being run.

Such matters will be considered objectively in the context of the licensing objectives and with the benefit of expert legal advice.

Where appropriate, conditions relating to these matters may be applied.

Drugs Policy:

The control of the use of illegal drugs by persons attending licensed premises is an important factor in the prevention of crime and disorder. It would be desirable for applicants to demonstrate in their operating schedules how they will address the incidence of drugs on their premises by the inclusion of a drugs policy which should include:

- Search as a condition of entry
- Search on entry policy
- Arrangements for detecting drugs on the premises
- The provision of drugs awareness information
- The provision of free drinking water
- Measures to prevent overcrowding
- Measures to create a safe environment, e.g. chill-out facilities
- Drugs awareness training for staff
- First Aid training for staff in dealing with those suffering from the ill-effects of drug use
- Door supervision.

Drugs policies will be expected to be tailored to the nature of the premises and the types of activities undertaken.

Conditions Relating to Public Safety

(including Fire Safety)

It should be noted that conditions relating to public safety should be those which are appropriate, in the particular circumstances of any individual premises or club premises, and should not duplicate other requirements of the law. Equally, the attachment of conditions to a premises licence or club premises certificate will not in any way relieve employers of the statutory duty to comply with the requirements of other legislation including the Health and Safety at Work etc. Act 1974, associated regulations and especially the requirements under the Management of Health and Safety at Work Regulations 1999 and the Regulatory Reform (Fire Safety) Order 2005 to undertake risk assessments. Employers should assess the risks, including risks from fire, and take measures appropriate to avoid and control these risks.

Conditions enforcing those requirements will therefore be unnecessary.

General:

When applicants for premises licences or club premises certificates are preparing their operating schedules or club operating schedules, responsible authorities are considering such applications and the Licensing Authority is considering applications following the receipt of relevant representations from a responsible authority or interested party, the following options will be considered as measures that, if appropriate, would promote public safety. It should also be recognised that special issues may arise in connection with outdoor and large scale events.

Whether or not any risk assessment shows any of the measures to be appropriate in the individual circumstances of any premises will depend on a range of factors including the nature and style of the venue, the activities being conducted there, the location of the premises and the anticipated clientele of the business involved.

- Those preparing operating schedules or club operating schedules, Licensing Authorities and responsible authorities should consider all relevant industry standards and guidance

The Licensing Authority and responsible authorities are aware that under no circumstances should any conditions be regarded as standard for all premises. Any individual preparing an operating schedule or club operating schedule is at liberty to volunteer any measure, as a step he or she intends to take to promote the licensing objectives. When incorporated into the licence or certificate as a condition, they become enforceable under the law and a breach of such a condition could give rise to prosecution.

The following are examples of conditions that may be applied:

Disabled people:

In certain premises where existing legislation does not provide adequately for the safety of the public, consideration may be given to conditions that ensure that:

- When disabled people are present, adequate arrangements exist to enable their safe evacuation in the event of an emergency; and
- Disabled people on the premises are made aware of those arrangements.

Safety checks:

In certain premises where existing legislation does not provide adequately for the safety of the public or club members and guests, consideration might also be given to conditions that ensure that:

- Safety checks are carried out before the admission of the public; and
- Details of such checks are kept in a logbook.

First Aid:

In certain premises where existing legislation does not provide adequately for the safety of the public or club members and guests, consideration might also be given to conditions that ensure that:

- Adequate and appropriate supply of First Aid equipment and materials is available on the premises
- If appropriate, at least one suitably trained First-Aider shall be on duty when the public are present, and if more than one suitably trained First-Aider that their respective duties are clearly defined.

Lighting:

In certain premises where existing legislation does not provide adequately for the safety of the public or club members and guests, consideration might also be given to conditions that ensure that:

- In the absence of adequate daylight, the lighting in any area accessible to the public, members or guests shall be fully in operation when they are present
- Emergency lighting is not to be altered without the consent of the Licensing Authority
- Emergency lighting batteries are fully charged before the admission of the public, members or guests
- In the event of the failure of normal lighting, where the emergency lighting battery has a capacity of one hour, arrangements are in place to ensure that the public, members or guests leave the premises within 20 minutes unless within that time normal lighting has been restored and the battery is being re-charged; and, if the emergency lighting

battery has a capacity of three hours, the appropriate period by the end of which the public should have left the premises is one hour.

Temporary electrical installations:

In certain premises where existing legislation does not provide adequately for the safety of the public or club members and guests, consideration might also be given to conditions that ensure that:

- Temporary electrical wiring and distribution systems shall comply with the recommendations of the relevant standards.
- Temporary electrical wiring and distribution systems are inspected and certified by a competent qualified person before they are put to use.

Ventilation:

In certain premises where existing legislation does not provide adequately for the safety of the public or club members and guests, consideration might also be given to conditions that ensure that:

- The premises are effectively ventilated
- Where the ventilation system is designed to maintain positive air pressure within part of the premises, that pressure is maintained whenever the public, member or guests are present in that part of the premises
- Ventilation ducts are kept clean
- Air filters are periodically cleaned and replaced to maintain a satisfactory air supply.

Indoor sports entertainments:

In certain premises where existing legislation does not provide adequately for the safety of the public or club members and guests, consideration might be given to conditions that ensure:

- If appropriate, an appropriately qualified medical practitioner is present throughout a sports entertainment involving boxing, wrestling, judo, karate or other sports entertainment of a similar nature
- Where a ring is involved, it is constructed and supported to the satisfaction of the Licensing Authority and any material used to form the skirt around the ring is flame-retardant
- At any wrestling or other entertainments of a similar nature members of the public do not occupy any seat within 2.5 metres of the ring
- At water sports entertainments, staff adequately trained in rescue and life safety procedures are stationed and remain within the vicinity of the water at all material times (see also 'Managing Health and Safety in Swimming Pools' issued jointly by the Health and Safety Commission and Sport England).

Theatres and Cinemas (Promotion of Public Safety):

In addition to the points made in Conditions relating to Public Safety there are particular matters in the context of public safety and fire safety which should be considered in connection with theatres and cinemas. The principle remains that conditions must be appropriate and should be established through risk assessment and standardised conditions should be avoided.

Drinks:

Except as authorised by the premises licence or club premises certificate, no drinks shall be sold to or be consumed by a closely seated audience except in plastic and paper containers.

Special effects:

Any special effects or mechanical installation should be arranged and stored so as to minimise any risk to the safety of the audience, the performers and staff.

Special effects include:

- Dry ice machines and cryogenic fog
- Smoke machines and fog generators
- Pyrotechnics, including fireworks
- Real flame
- Firearms
- Motor vehicles
- Strobe lighting
- Lasers
- Explosives and highly flammable substances.

In certain circumstances, it may be appropriate to require that certain special effects are only used with the prior consent of the Licensing Authority.

Any scenery should be maintained flame-retardant.

Smoking:

Licensees should consider the risks from second-hand smoke to users of the permitted smoking areas when drawing up operating schedules.

Conditions Relating to the Prevention of Public Nuisance

It should be noted that provisions of the Environmental Protection Act 1990 and the Noise Act 1996 provide some protection to the general public from the effects of noise nuisance. In addition, the provisions in the Anti-Social Behaviour, Crime and Policing Act 2014 enable a senior Police or Local Authority officer to close down instantly for up to 24 hours licensed premises and premises carrying on temporary permitted activities that are causing nuisance resulting from noise emanating from the premises. These matters should be considered before deciding whether or not conditions are appropriate for the prevention of public nuisance.

General:

When applicants for premises licences or club premises certificates are preparing their operating schedules or club operating schedules, responsible authorities are considering such applications and the Licensing Authority are considering applications following the receipt of relevant representations from a responsible authority or interested party, the following options will be considered as measures that, if appropriate, would promote the prevention of public nuisance.

Whether or not any risk assessment shows them to be appropriate in the individual circumstances of any premises will depend on a range of factors including the nature and style of the venue, the activities being conducted there, the location of the premises and the anticipated clientele of the business involved.

Appropriate conditions for licences and certificates will also depend on local knowledge of the premises.

Hours:

The hours during which the premises are permitted to be open to the public or to members and their guests can be restricted by the conditions of a premises licence or a club premises certificate for the prevention of public nuisance. But this must be balanced by the potential impact on disorder that results from artificially early fixed closing times.

Restrictions could be appropriate on the times when certain licensable activities take place even though the premises may be open to the

public as such times. For example, the playing of recorded music after a certain time might be prohibited, even though other licensable activities are permitted to continue.

Restrictions might be appropriate on the parts of premises that might be used for certain licensable activities at certain times. For example, while the provision of regulated entertainment might be permitted while the premises is open to the public or members and their guests, regulated entertainment might not be permitted in garden areas of the premises after a certain time.

Where appropriate, conditions relating to these matters may be applied.

“If Regulated Entertainment is to be operated:

All doors and windows will remain closed during the operation of regulated entertainment or in any event after ‘22:00’. The entrance door will preferably be fitted with a self-closing device and staff required to ensure that it is not propped open. A member of staff shall be responsible to ensure that doors are opened for as brief a period as possible. Where necessary adequate and suitable mechanical ventilation should be provided to public areas.

Entry to the premises will be restricted to a particular entrance(s) whilst the premises is being used for regulated entertainment.

For new premises (under construction/renovation/change of use) where regulated entertainment is to be operated, the provision of lobbied doors will be advisable, to prevent noise breakouts. Entrance/exit from the premises whilst regulated entertainment is ongoing shall be via lobbied doors to minimise noise breakout. This requirement may not apply to existing premises which do not currently have lobbied doors.

It is recommended that regulated entertainment shall conclude 30 minutes before the premises is due to close to prevent excessive noise breakout as the premises empties.

Structure borne noise

All speakers are mounted on anti-vibration mountings to prevent vibration transmission of sound energy to adjoining properties.

Sound limits

The licensee shall ensure that no music played in the licensed premises is audible at or within the site boundary of any residential property.

All regulated entertainment amplified activity will utilise the in-house amplification system, the maximum output of which is controlled by the duty manager.

The level of amplified regulated entertainment shall be controlled by means of limiting device set at a level which upon request may be agreed with the licensing authority, or utilise an in-house amplification system, the maximum output of which is controlled by the duty manager.

Outside Areas

No music will be played in, or for the benefit of patrons in external areas of the premises.

No form of loudspeaker or sound amplification equipment is to be sited on or near the exterior premises or in or near any foyer, doorway, window or opening to the premises.

Where noise sensitive receivers are within proximity to the premises wishing to apply for a licence, signs shall be displayed in the external areas/on the frontage requesting patrons to recognise the residential nature of the area and conduct their behaviour accordingly.

If Beer Gardens are part of the application, the bar garden will be closed at '22:00' with only a certain number of persons permitted to utilise the beer garden/frontage. The person exposed to residences will be restricted to suitable number persons after '22:00'.

Only patrons seated at tables will be permitted in the beer garden.

The beer garden/frontage will be closed, and patrons requested to come inside the main structure of the premises at '22:00' hours.

Plant and machinery

The applicant to source quieter models or plant and machinery if the application is for an establishment of new licensed activities which require installation of plant and machinery. All plant and machinery shall be correctly maintained and regularly serviced to ensure that it is operating efficiently and with minimal disturbance to neighbours.

Patrons entering/exiting premises.

Where people queue to enter the premises a licensed door supervisor shall supervise and ensure the potential patrons behave in an acceptable manner

Signs should be displayed requesting patrons to respect the neighbours and behave in a courteous manner.

Prevention of Nuisance from Odour

All ventilation and extraction systems shall be installed in accordance British Standards and shall be adequately maintained and regularly serviced to ensure that it is operating efficiently and with minimal disturbance to neighbours arising from noise and/or odour.

Prevention of nuisance from light

The use of explosives, pyrotechnics and fireworks will be restricted to 12:00pm and 22.00 and located away from nearby residential premises.

Illuminated external signage shall be switched off when the premises is closed.

Security lights will be positioned to minimise light intrusion to nearby residential premises.

Full details of concerns raised above need to be supplied to Environmental Health for our perusal. This would enable us to examine the application and make comments as to whether the proposed operations can cause noise nuisance/public nuisance.

Sound limits

The licensee shall ensure that no music played in the licensed premises is audible at or within the site boundary of any residential property.

All regulated entertainment amplified activity will utilise the in-house amplification system, the maximum output of which is controlled by the duty manager.

The level of amplified regulated entertainment shall be controlled by means of limiting device set at a level which upon request may be agreed with the licensing authority.

Outside Areas

No music will be played in, or for the benefit of patrons in external areas of the premises.

No form of loudspeaker or sound amplification equipment is to be sited on or near the exterior premises or in or near any foyer, doorway, window or opening to the premises.

Signs shall be displayed in the external areas/on the frontage requesting patrons to recognise the residential nature of the area and conduct their behaviour accordingly. The management must reserve the right to ask patrons to move inside the premises or leave if it is felt that they could be disturbing neighbours.

Deliveries and collections.

Deliveries and collections associated with the premises will be arranged between the hours 08:00 and 18:30 to minimise the disturbance caused to the neighbours.

Glasses will be collected or emptied at the beginning of the day rather than at closing time (Emptying/Collection between 07:00 – 22:00) when neighbours in proximity might be unduly disturbed.

Empty bottles and non-degradable refuse will remain in the premises at the end of trading hours and taken out to the refuse point at the start of the working day rather than at the end of trading when neighbours might be unduly disturbed”.

Conditions Relating to the Protection of Children from Harm

It should be noted that it is unlawful under the 2003 Act to permit unaccompanied children under the age of 16 to be present on premises exclusively or primarily used for supply of alcohol for consumption on those premises under the authorisation of a premises licence, club premises certificate or a temporary event notice when open for the purposes of being used for the supply of alcohol for consumption there. In addition, it is an offence to permit the presence of children under 16 who are not accompanied by an adult between midnight and 5am at all premises supplying alcohol for consumption on those premises under the authorisation of any premises licence, club premises certificate or temporary event notice. Conditions duplicating these provisions are, therefore, unnecessary.

Access for children to licensed premises - in general:

Restrictions on the access of children under 18 to premises where licensable activities are being carried on will be made where it is appropriate to protect children from harm.

Conditions attached to premises licences and club premises certificates may reflect the concerns of responsible authorities and interested parties who have made representations but only where the licensing authority considers it appropriate to protect children from harm.

While the application of conditions will depend on the specific circumstances of an application, the Licensing Authority will, (unless there are circumstances justifying the contrary), adhere to the following recommendations as put forward by the Secretary of State:

- for any premises having known associations (having been presented with evidence) with or likely to give rise to heavy or binge or underage drinking, drugs, significant gambling, or any activity or entertainment (whether regulated entertainment or not) of a clearly adult or sexual nature, there should be a strong presumption against permitting any access at all for children under 18 years.

Applicants wishing to allow access for children to premises where these associations may be relevant, when preparing operating schedules or club operating schedules or variations of those schedules for the purposes of obtaining or varying a premises licence or club premises certificate should:

- explain their reasons; and
- outline in detail the steps that they intend to take to protect children from harm on such premises.

For any premises not serving alcohol for consumption on the premises, but where the public are allowed on the premises after 11.00pm in the evening, there should be a presumption against the presence of children under the age of 12 unaccompanied by adults after that time.

Applicants wishing to allow access when preparing operating schedules or variations of those schedules or club operating schedules for the purposes of obtaining or varying a premises licence or club premises certificate should explain their reasons and outline in detail the steps that they intend to take to protect children from harm on such premises.

In any other case, subject to the premises licence holder's or club's discretion, the expectation would be for unrestricted access for children subject to the terms of the 2003 Act. An operating schedule or club operating schedule should indicate any decision for the premises to exclude children completely, which would mean there would be no need to detail

in the operating schedule steps that the applicant proposes to take to promote the protection of children from harm.

Otherwise, where entry is to be permitted, the operating schedule should outline the steps to be taken to promote the protection of children from harm whilst on the premises.

Age restrictions – specific:

Under the 2003 Act, a wide variety of licensable activities could take place at various types of premises and at different times of the day and night. Whilst it may be appropriate to allow children unrestricted access at particular times and when certain activities are not taking place, the Licensing Authority, following relevant representations made by responsible authorities and interested parties, will consider a range of conditions that will be tailored to the particular premises and their activities where these are appropriate.

The Licensing Authority will consider the hours of the day during which age restrictions should and should not apply. For example, the fact that adult entertainment may be presented at premises after 8.00pm does not mean that it would be appropriate to impose age restrictions for earlier parts of the day;

- types of event or activity in respect of which no age restrictions may be needed, for example family entertainment; or non-alcohol events for young age groups, such as under 18s dances.

Similarly, types of event or activity which give rise to a more acute need for age restrictions than normal, for example:

- during “Happy Hours” or on drinks promotion nights;
- during activities outlined above.

Age restrictions – cinemas:

The Secretary of State considers that, in addition to the mandatory condition imposed by virtue of section 20 which requires the admission of children to films to be restricted in accordance with recommendations given either by a body designated under section 4 of the Video Recordings Act 1984 or by the Licensing Authority itself, conditions restricting the admission of children to film exhibitions should include:

- a condition that where the Licensing Authority itself is to make recommendations on the admission of children to films, the cinema or venue operator must submit any film to the Licensing Authority that it intends to exhibit 28 days before it is proposed to show it. This is to allow the Licensing Authority time to classify it so that the premises licence holder is able to adhere to any age restrictions then

imposed;

- a condition that when films are classified, by either the film classification body as specified in the licence or the Licensing Authority, they should be classified in the following way:

> U Universal – suitable for audiences aged four years and over

> PG – Parental Guidance. Some scenes may be unsuitable for young children

> 12A – Passed only for viewing by persons aged 12 years or older or persons younger than 12 when accompanied by an adult

> 15 – Passed only for viewing by persons aged 15 years and over

> 18 – Passed only for viewing by persons aged 18 years and over

- that conditions specify that immediately before each exhibition at the premises of a film passed by the British Board of Film Classification there shall be exhibited on screen for at least five seconds in such a manner as to be easily read by all persons in the auditorium a reproduction of the certificate of the Board or, as regards a trailer advertising a film, of the statement approved by the Board indicating the classification of the film;
- a condition that when a licensing authority has made a recommendation on the restriction of admission of children to a film, notices are required to be displayed both inside and outside the premises so that persons entering can readily be made aware of the classification attached to any film or trailer. Such a condition might be expressed in the following terms:

“Where a programme includes a film recommended by the licensing authority as falling into the 12A, 15 or 18 category no person appearing to be under the age of 12 and unaccompanied, or under 15 or 18 as appropriate, shall be admitted to any part of the programme; and the licence holder shall display in a conspicuous position a notice in the following terms –

PERSONS UNDER THE AGE OF [INSERT APPROPRIATE AGE] CANNOT BE ADMITTED TO ANY PART OF THE PROGRAMME

Where films of different categories form part of the same programme, the notice shall refer to the oldest age restriction. This condition does not apply to members of staff under the relevant age while on-duty provided that the prior written consent of the person’s parent or legal guardian has first been obtained.”

Theatres:

The admission of children to theatres, as with other licensed premises, is not expected to normally be restricted unless it is appropriate to promote the licensing objective of the protection of children from harm. However, theatres may be the venue for a wide range of activities. The admission of children to the performance of a play is expected to normally be left to the discretion of the licence holder and no condition restricting the access of children to plays should be attached. However, theatres may also present entertainment including, for example, variety shows, incorporating adult entertainment.

A condition restricting the admission of children in such circumstances may be appropriate. Entertainment may also be presented at theatres specifically for children (see below).

The Licensing Authority will consider whether a condition should be attached to a premises licence, which requires the presence of a sufficient number of adult staff on the premises to ensure the wellbeing of children present on the premises during any emergency.

Performances especially for children:

Where performances are presented especially for unaccompanied children in theatres and cinemas, conditions are anticipated to be needed which require an attendant to be stationed in the area(s) occupied by the children, in the vicinity of each exit, provided that on each level occupied by children the minimum number of attendants on duty should be one attendant per 50 children or part thereof.

Regard will be had to any representations made by responsible authorities on the issue, to also consider whether or not standing should be allowed. For example, there may be reduced risk for children in the stalls than at other levels or areas in the building.

Children in performances:

There are many productions each year that are one-off shows where the cast is made up almost entirely of children. They may be taking part as individuals or as part of a drama club, stage school or school group. The age of those involved may range from 5 to 18.

The Children (Performances) Regulations 1968 as amended set out requirements for children performing in a show.

However, if it is appropriate to consider imposing conditions, in addition to these requirements, for the promotion of the protection of children from harm then the Licensing Authority will consider the matters outlined below.

- **Venue** – the backstage facilities should be large enough to accommodate safely the number of children taking part in any performance
- **Fire safety** – all chaperones and production crew on the show should receive instruction on the fire procedures applicable to the venue prior to the arrival of the

children

- **Special effects** – it may be inappropriate to use certain special effects, including smoke, dry ice, rapid pulsating or flashing lights, which may trigger adverse reactions especially with regard to children
- **Care of children** – theatres, concert halls and similar places are places of work and may contain a lot of potentially dangerous equipment. It is therefore important that children performing at such premises are kept under adult supervision at all times including transfer from stage to dressing room and anywhere else on the premises. It is also important that the children can be accounted for at all times in case of an evacuation or emergency.

Proof of age:

Where appropriate, a requirement for the production of PASS accredited proof of age card before any sale of alcohol is made may be attached to any premises licence or club premises certificate for the protection of children from harm. Any such requirement should not be limited to recognised “proof of age”, but allow for the production of other proof, such as photo-driving licences, passports or digital equivalents that have been approved by the Home Office. It should be noted that many adults in England and Wales do not currently carry any proof of age. To assist in ensuring that only persons over the age of 18 are able to purchase alcohol, then the Challenge 25 Scheme may be applied. This will ensure that most minors – even those looking older – would need to produce proof of age appropriately before making such a purchase. Under such an arrangement only a minority of adults might be affected, but for the majority there would be no disruption to their normal activity, for example, when shopping in a supermarket.

Proof of age can also ensure that appropriate checks are made where the presence of children is restricted by age at certain times, such as 16.

Smoking areas:

The risks to children from second-hand smoke should be considered when submitting operating schedules. Appropriate measures to protect children from exposure should be documented and put in place in those areas to which children are admitted or to which they have access.

Motion to Full Council – 19th November 2025

Marking the First Anniversary of the Borough's Civic Pride Campaign

Newcastle-under-Lyme Borough Council launched its Civic Pride campaign to enhance the borough's reputation as a clean, safe, and welcoming place.

Over the past 12 months, the community, businesses, partner organisations, and council services have united under the banner #PrideInNUL to boost civic engagement, foster pride, and deliver visible improvements across our town centres, high streets, and both urban and rural neighbourhoods.

The Civic Pride campaign has now reached every ward in the borough, involving activities such as litter-picks, green space planting, business & community engagement visits, bike safety and security, Public Space Protection Order reviews, and other initiatives.

Council teams including Streetscene, Housing and Homelessness, and the Mobile Multifunctional town ranger services have played a key role in the campaign's core activities, including cleansing, graffiti removal, support for vulnerable individuals, and maintaining a visible street presence.

Key partners including Staffordshire Police, Aspire Housing, the Business Improvement District, and Staffordshire County Council have actively supported the campaign.

To further empower community-led initiatives, the Council has established a Civic Pride Investment Fund of £22,000 for 2025/26.

Council believes that:

Civic Pride is about more than just cleanliness and maintenance — it's about people, place, purpose, and partnership. As we mark the first year of the campaign, we must build on its achievements with ambition, ensuring every resident of all ages and backgrounds feels pride in their neighbourhood and safe in their community, especially at a time when social cohesion is increasingly challenged.

Council therefore resolves to:

1. Acknowledge the successful first year of the Civic Pride campaign, recognising the contributions of Council staff, councillors, partner organisations, community groups, businesses, and residents.
2. Reaffirm its commitment to the core goals of Civic Pride: creating a cleaner, safer, and more welcoming borough, and fostering a stronger community cohesion across the borough.

3. Recognise the positive outcomes and momentum generated so far, while acknowledging that further work is needed to embed Civic Pride in all aspects of Council activity.
4. Request that Cabinet and the Health and Wellbeing Scrutiny Committee receive a report on the rollout of Civic Pride to help shape future plans, including:
 - a) Targets and benchmarks for cleanliness, safety, amenity, community engagement and cohesion.
 - b) A communications and engagement plan to increase involvement from residents, schools, businesses, and community organisations.
 - c) An updated neighbourhood-by-neighbourhood rollout plan to ensure comprehensive coverage.
 - d) A review of the impact of the Civic Pride Investment Fund and proposals for future funding rounds.
 - e) Explore new opportunities for youth involvement, digital engagement, volunteering and sponsorship.
5. Note the incorporate of the Civic Pride values as a core element in the Council's wider community, neighbourhood and place-shaping strategies included in its submission to government regarding Local Government Reorganisation.
6. Welcome the launch of the 'Winter of Action' in Town Centres campaign and notes its alignment with existing Civic Pride efforts by the Council and its partners.

Proposed: Simon Tagg

Seconded: David Hutchison

NEWCASTLE-UNDER-LYME BOROUGH COUNCIL

CORPORATE LEADERSHIP TEAM'S REPORT TO COUNCIL

19th November 2025

Report Title: Reports from Outside Bodies

Submitted by: Service Director, Legal & Governance

Portfolios: All

Ward(s) affected: All Wards

<u>Purpose of the Report</u>	<u>Key Decision</u>	Yes ☐	No ☒
Following the decision of full council in April 2005 to review the framework for the Council's appointment to outside bodies it agreed that representatives on outside bodies should provide a Bi-annual report to full council on the activities of such outside bodies. This report provides further information in relation to those reports which have been obtained.			
<u>Recommendation</u> That Council Notes and accepts receipt of the bi-annual reports which have been received in relation to the business carried out/matters dealt with by relevant Outside Bodies to full Council as appropriate.			
<u>Reasons</u> To keep council advised as to developments in relation to outside bodies to which elected members are appointed on behalf of the Council. The provision of such reports were requested by full council and the Council constitution amended to reflect the wishes of the Council in this regard.			

1. **Background**

- 1.1 The Council is obliged to nominate member representatives on outside bodies.
- 1.2 These nominations need to be made in line with the arrangements set out in section B1: 6.1 of the Council constitution.
- 1.3 Council in April 2005 resolved that there be a new framework for the Council's appointment to outside bodies and that representatives on such outside bodies should provide a Bi-annual report to full council on their activities.
- 1.4 A full list of outside bodies for which the Council requires a representative, including those which will continue to be allocated to ward members, is set out in Appendix 1.

2. Issues

- 2.1 The Council's constitution now sets out a mechanism by which members provide Bi-annual reports from outside bodies to which they are nominated.
- 2.2 This report sets out those reports which have been supplied by members to date (Appendix 2)
- 2.3 LAP have been dissolved or are no longer supported by the Council - the Outside Bodies list will be updated to reflect that at the Annual Council meeting; the Council is currently investigating an alternative neighbourhood locality arrangement.
- 2.4 There is not an expectation of reports from Community Centres Committees unless members feel the need to submit one.

3. Recommendation

- 3.1 It is recommended that Council:

- Notes that appointees to Outside Bodies have been asked to provide a bi-annual report in relation to the business carried out/matters dealt with by the relevant Outside Body on which they are appointed.
- Notes and accepts the bi-annual reports at Appendix B which have been received in relation to those Outside Bodies.

4. Reasons

- 4.1 To ensure decision-making is transparent and accurately reflects the council constitution.
- 4.2 This being the first bi-annual report back from Outside Bodies this is a stand-alone report, although in future these will be included in the 'reports section' of the Council with a link to the reports.

5. Options Considered

- 5.1 No alternative options are relevant.

6. Legal and Statutory Implications

- 6.1 The Council must ensure that its constitution accurately reflects the reality of decision-making and it does not act ultra vires and there is transparency in reporting and decision-making.

7. Equality Impact Assessment

- 7.1 An equality impact assessment is not required as a result of the proposed changes to the Constitution.

8. Financial and Resource Implications

- 8.1 There are no direct financial or resource implications arising from these proposed changes.

9. Major Risks & Mitigation

- 9.1** There is a risk that if the governance and reporting arrangements for outside bodies are not carried out in accordance with the council constitution that this may potentially result in reputational damage with external stakeholders/outside bodies.

10. UN Sustainable Development Goals (UNSDG)

- 10.1** Appointments to outside bodies cover a diverse range of activities which would fall within UN Sustainable Development Goals.



11. Key Decision Information

- 11.1** This is not a key decision.

12. Earlier Cabinet/Committee Resolutions

- 12.1** Not applicable.

13. List of Appendices

- 13.1** Appendix 1 – Appointments to Outside Bodies.
13.2 Appendix 2 – Reports from Outside Bodies

14. Background Papers

- 14.1** None.

LIST OF OUTSIDE BODIES AND REPRESENTATIVES

BODY	REPRESENTATIVE	RESPONSE
Aspire Housing	Cllr Northcott	Y
Business Improvement District	Cllr Simon Tagg	Y
Campaign to Protect Rural England (Staffs Branch)	Cllr Simon Tagg	Y
Corporate Parenting Panel	Cllr Heesom	Y
District Councils' Network	Cllr Simon Tagg	Y
Enjoy Staffordshire – Destination Management Partnership	Cllr Sweeney	Y
Go Kidsgrove	Cllr Skelding	Y
LGiU Assembly	Cllr Hutchison	Y
Local Government Association	Cllr Simon Tagg	Y
Newcastle Partnership	Cllr Simon Tagg	Y
Parking and Traffic Regulations Outside London Adjudication Joint Committee	Cllr Heesom	Y
Sir John Offley Almshouse Trust	Cllr Whitmore	Y
Staffordshire County Council Health and Care Overview and Scrutiny Committee	Cllr Adcock	Y
Staffordshire Leaders Board	Cllr Simon Tagg	Y
Staffordshire Playing Fields Association	Cllr Skelding	Y
Staffordshire Police, Fire and Crime Panel and Associated Panels	Cllr Heesom	Y
Staffordshire Sustainability Board	Cllr Hutchison	Y
Stoke on Trent and North Staffs Theatre Trust Ltd.	Cllr Mark Holland	Y
Newcastle under Lyme Almshouse Charity	Cllrs' Gill and John Williams	Y
North Staffs Victim Support*	Cllr Heesom	Y
Waste and Mineral Site Liaison Committee – Acton(Acton Composting Facility)	Cllr Bryan	Y
Waste and Mineral Site Liaison Committee – Holditch House	Cllr Beeston	Y
Waste and Mineral Site Liaison Committee – Keele (Madeley Heath)	Cllrs' Berrisford and Whitmore	Y
Waste and Mineral Site Liaison Committee – Knutton Quarry	Cllrs' Adcock and Dean	Y
Waste and Mineral Site Liaison Committee – Walleys Landfill Site	Cllrs' Adcock, Bettley-Smith, Dean and Dave Jones	NA
West Midlands Reserve Forces and Cadets Association	Cllr Stephen Sweeney	Y
West Midlands Employers Shareholders Board	Cllr Simon Tagg	Y

*No longer meet

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MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: BID, DCN, LGA, NP, SLB, WME, CPRE

Submitted by: Simon Tagg

Update:

- **Newcastle Business Improvement District (BID)**

Monthly Board meetings during this period. Main items discussed – town centre events, business support and BID re-ballot. Link to details: <https://www.newcastleunderlyme.org/>

- **District Council Network (DCN)**

Various meetings relating to Local Government Reorganisation and Devolution that have fed into Council and Cabinet reports.

- **Local Government Association (LGA)**

Attended the LGA Conference and various meetings relating to Local Government Reorganisation and Devolution that have fed into Council and Cabinet reports.

- **Newcastle Partnership**

Attended the partner priority setting meeting. Link to details: <https://www.newcastle-staffs.gov.uk/community-safety/newcastle-partnership>

- **Staffordshire Leaders Board**

Attended Board meetings relating to Local Government Reorganisation, Devolution and asylum dispersal, economic development and transport that have fed into Council and Cabinet reports. Link to details:

<https://staffordshire.moderngov.co.uk/mgCommitteeDetails.aspx?ID=1250>

- **West Midland Employers (WME)**

Two meetings during this period that clashed with Cabinet meetings. Link to details: <https://wmemployers.org.uk/>

- **Campaign for the Protection of Rural England (CPRE)**

One meeting during this period. Link to details: <https://www.cprestaffordshire.org.uk/>

MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: **West Midlands Reserve Forces and Cadets Association**

Submitted by: **Cllr Stephen Sweeney**

Update:

The Association has not met for the last six months.

Next meeting date: N/A

Actions arising from the Meeting:

N/A

MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: **Enjoy Staffordshire – Destination Management Partnership**

Submitted by: **Cllr Stephen Sweeney**

Update:

The Partnership has not met for the last six months.

Next meeting date: N/A

Actions arising from the Meeting:

N/A

MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: Corporate Parenting Panel

Submitted by: Gill Heesom

Update:

Staffordshire's corporate parent meetings involve the Corporate Parenting Panel which holds business, working, and hot topic meetings to improve services for children in care and care leavers. The Children in Care Council also meets twice monthly, and the The Voice Project holds monthly forums, to ensure that the voices of young people are heard and acted upon by the panel, managers, and partner agencies. These meetings focus on a shared responsibility for corporate parenting, with a focus on improving outcomes for children and young people.

Main Corporate Parenting Meetings were held on 16/7/2025, 18/9/2025 and 23/10/25 although several earlier meetings from May to July were cancelled by the new administration when they took control of the council in May 2025.

Corporate Parenting meetings are not open to the public and a link to the most recent annual report is shown below.

<https://staffordshire.moderngov.co.uk/documents/s201940/Corporate%20Parenting%20Panel%20Annual%20Report%202024-25.pdf>

Next meeting date: 18 December 2025

Actions arising from the Meeting:

Not open to the public, although a request for Christmas presents for children in care will be publicised shortly and I would ask that Cllrs and any other interested parties consider providing a present.

MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: North Staffs Victim Support
Submitted by: Gill Heesom

Update:

North Staffs Victim Support is no longer a charity and has not met in the current civic year.

The region's victim support is now part of the Staffordshire Victim Gateway further details of which can be found on the following link: <https://svg.org.uk/>

Next meeting date: N/A

Actions arising from the Meeting: N/A

MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: Parking and Traffic Regulations Outside London (PATROL)
Submitted by: Gill Heesom

Update:

PATROL met on 15 July 2025 and **14 October 2025** links to available meeting papers are shown below:

https://www.patrol.gov.uk/committee_papers/July-2025-JC-Agenda.pdf

https://www.patrol.gov.uk/committee_papers/ESC-Agenda-14-10-2025.pdf

Next meeting date: 20 January 2026

Actions arising from the Meeting: N/A

MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: **Staffordshire Police, Fire and Crime Panel (PFCP)**
Submitted by: **Gill Heesom**

Update: Staffordshire Police, Fire and Crime Panel (PFCP): This is the main body that scrutinizes the Commissioner's work, decisions, and performance. The panel is comprised of ten local Councillors from different local authorities in the area and two independent members.

PFCP met on 28 July 2025, 22 September 2025 and also a confirmation hearing for consideration for a proposed Section 151 Officer appointment was held 22 September 2025.

Links to the meeting papers and webcasts are shown below

<https://staffordshire.moderngov.co.uk/ieListDocuments.aspx?CId=1150&MId=17907&Ver=4>

<https://staffordshire.moderngov.co.uk/ieListDocuments.aspx?CId=1150&MId=17759&Ver=4>

<https://staffordshire.moderngov.co.uk/ieListDocuments.aspx?CId=1150&MId=18093&Ver=4>

Next meeting date: 17 November 2025

Actions arising from the Meeting: N/A

MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: LGiU

Submitted by: Cllr David Hutchison

Update:

Newcastle-under-Lyme Borough is a member of the Local Government Information Unit. This provides Daily and Weekly news updates to all Borough Councillors. If you are not receiving updates, you can register at lgIU.org

Next meeting date:

Actions arising from the Meeting:

MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: **Staffordshire Sustainability Board**

Submitted by: **Cllr David Hutchison**

Update:

Staffordshire Sustainability Board (SSB).

Staffordshire Sustainability Board is made up of Lead Members and Senior Officers from each of the 10 authorities in Staffordshire. The board considers issues relating to sustainability and waste management. As the Portfolio Holder for the Sustainable Environment at the Borough Council. I am the lead member for the Borough Council at the SSB.

For more details, see [Staffordshire Sustainability Board - Staffordshire County Council](#)

Next meeting date:

Actions arising from the Meeting:

MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: **Waste and Mineral Site Liaison Committee-Holditch House**

Submitted by: **Cllr Sue Beeston**

Hasn't met

Next meeting date:

Actions arising from the Meeting:

MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: Knutton Quarry Waste and Mineral Site Liaison Committee

Submitted by: Cllr Rupert Adcock

Update:

The Committee met on 25 September and I sent apologies. Operational and site updates were given. I discussed with them the community fund and following this the committee voted on a proposal submitted by Silverdale Primary for grant funding which was approved. An update to membership was also being discussed to reflect changes in council membership.

Next meeting date: unknown

Actions arising from the Meeting:

MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: **Waste and Mineral Site Liaison Committee- Knutton Quarry**

Submitted by: **Cllr Lynn Dean**

At the last meeting it was discussed what the company's plans are for restoration.
We also discussed the company's local community fund scheme.

Next meeting date:

Actions arising from the Meeting:

MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: **Keele Waste Mineral Committee**

Submitted by: **Cllr Amanda Berrisford & Cllr Jill Whitmore**

Update:

We are not aware of any meetings having been held, we have not been invited to any.

MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: **ASPIRE HOUSING**

Submitted by: **Cllr Paul Northcott**

Update:

The Board has met 6 times during this period including a 2 day away day for board members and the executive management team. These have been a mixture of both in person and online platforms. During the previous year there has been quite a few changes to the Board membership as there have been several retirements. Appointments have refreshed and strengthened the Board building upon the successes of the previous encumbrance.

The Board has steered the company through some challenging economic times that have changed due to external influences but has come through this period and finds itself in a strong position today. Today Aspire own and manage across Staffordshire and Cheshire more than 9,500 properties and look after more than 19,000 customers. Aspire are celebrating their 25th anniversary this year.

Customer service remains at the centre of Aspire's top priorities. The company has improved on both customer and staff satisfaction over the last 6 years and recent positive feedback has reflected this improvement. Aspire's 2030 Corporate plan can be found here.

<https://www.aspirehousing.co.uk/about-us/corporate-plan/>

<https://www.aspirehousing.co.uk/about-us/tenant-satisfaction-measures/>

Members may have noticed through the Planning process, the Council's interactions with the development arm of Aspire to deliver Joint improvements for the residents of Newcastle from the securing bid for Government improvement funds. This has been highlight through this Council's Cabinet and Planning Committee Agenda and Reports. Aspire continues to work with the leadership and executive officers of Newcastle Under Lyme Borough Council.

The full details of specific items discussed at board meetings, contain commercially sensitive information which is not put in the public domain. However, any further questions outside confidential content may be discussed with me by arrangement, and if members wish to know more about the present and current company position a link is included to provide more detail as to the global business here:

<https://www.aspirehousing.co.uk/about-us/our-policies/>

Kindest regards

Cllr Paul Northcott.

November 2025

Next meeting date: 16th December 2025

Actions arising from the Meeting: N/A

MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: **Staffordshire Health and Care Overview and Scrutiny Committee**

Submitted by: **Cllr Rupert Adcock**

Update:

The committee met on the following dates 30 June, 31 July, 15 Sept and is due to meet on 10 Nov

Many items were discussed relating to the Integrated Care Board 2025/6 operations plan, proposed cost savings plan, Freedom to Speak Up update, updates on services at Stafford hospital and cardiac services at Burton. We had a briefing on the rollout of mental health support services in schools and we also have a briefing planned on Family Hubs. I gave an update on the activity of our committee at the July meeting and will do so again on 10 Nov. County Cllr Adam Griffiths was appointed representative on our Borough Scrutiny Committee and will be attending and briefing our meetings on County activity.

Next meeting date:
10 Nov 2025

Actions arising from the Meeting:

MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: **Madeley Alms Houses Trustees**

Submitted by: **Cllr Jill Whitmore**

Update:

The meeting took place on Monday 3rd November at 5.00pm.

We discussed the need to slightly increase the rental for these properties. There is a long waiting list for these properties at the moment.

We also discussed the amendments to the tenant's handbook.

Next meeting date:

The next meeting will be in 2026 as the committee do not hold the meetings monthly.

Actions arising from the Meeting:

MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: **Staffordshire Playing Fields Association**

Submitted by: **Cllr Craig Skelding**

Update:

There have been no meetings in the last six months.

Next meeting date:

TBC

Actions arising from the Meeting:

MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: **Acton Composting Facility**

Submitted by: **Amy Bryan**

Update:

The body has not met in the last year.

Next meeting date: tbc

Actions arising from the Meeting:

MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: Newcastle-under-Lyme Almshouse Charity

Submitted by: Cllr John Williams

Update:

Almshouse Trust Trustee. Chairman of Trust that operates in managing five bungalows. Met 3rd November 2025. Discussion about welfare of the residents. Rent Increase in line with inflation. Kitchen improvements, radiator thermostats and the general maintenance of the properties.

Next meeting date: Meeting to be arranged

Actions arising from the Meeting: Prices for improvements to Bungalows by
Maintenance Officers

MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: Stoke-on-Trent and North Staffordshire Theatre Trust Ltd (New Vic Theatre)

Submitted by: Mark Holland

Update:

For the benefit of Members unfamiliar, the New Vic Theatre is run by the Stoke-on-Trent and North Staffordshire Theatre Trust Ltd. The Trust's board includes directors nominated by three local authorities (the Borough Council, Staffordshire County Council, and Stoke-on-Trent City Council), reflecting its origins which included the councils as partner organisations. The New Vic is a professional producing theatre, a registered charity, and an Arts Council England National Portfolio Organisation. The main auditorium was Europe's first purpose-built theatre-in-the-round.

The Trust reported the following impact statistics in its most recent annual statement:

Our Organisational Impact 2024-25

- *184,468 people visited the New Vic for performances, projects, and activities.*
- *Dynamic Theatre Making – 93,696 people experienced live performance across 337 shows.*
- *Active Participation – 32,971 people took part in creative programmes with our Education and Borderlines teams.*
- *Community Hub – 28,060 people used our space to meet, socialise and visit our exhibitions*
- *Youth Engagement – 23,944 under-26s attended performances.*
- *Inclusive Reach – 20% of theatregoers came from some of UK's most deprived areas.*
- *Access for Schools – 19,508 pupils from 143 schools experienced live performance, many for the first time.*
- *Regional Impact – 20% of audiences are from outside Staffordshire and Stoke-on-Trent.*

During the past six months, the Theatre has continued to deliver an artistic programme that attracts national acclaim and is of an internationally high standard.

Artistic Director Theresa Heskins and Associate Director Vicki Amedume were shortlisted in September in the Best Director category at the UK Theatre Awards, for 'The Company of Wolves'. In addition to achieving national recognition, that show was an example of the New Vic's continued partnership with co-producers Upswing Aerial, which initially arose from the very successful programme of work celebrating the Newcastle-born founder of the modern circus, Philip Astley.

Locally produced programming during the past six months has included:

- 'Whatever Happened to Phoebe Salt', the premiere of the final work of Stoke-on-Trent playwright and artist Arthur Berry, as part of his centenary celebrations.
- 'Big Big Sky', by Tom Wells
- 'The Grand Babylon Hotel', adapted from the novel by Arnold Bennett and produced in association with local company Claybody Theatre
- 'The Little Mermaid', adapted by Theresa Heskins from the story by Hans Christian Andersen, began its run on 14 November.

In addition to the Theatre's main-stage output, the Trust's community and education teams deliver programmes of work with some of the most disadvantaged and marginalised among our community, particularly young people. Borderlines and New Vic Education have received funding from local and national government, the NHS, and corporate philanthropy, to undertake a wide range of projects.

Over the summer holiday, the Education team produced an interactive performance for children 4+, themed on 'Dr Doolittle' which toured libraries in Staffordshire, including Kidsgrove Library, as part of the Summer Reading Challenge. Education workshops were also hosted at the New Vic for young people in age categories 6-9 and 10-15.

Last month, New Vic Borderlines launched Chapter 2, a new project to support mental wellbeing in teenagers, funded by North Staffordshire Combined Healthcare NHS Trust. Recent projects delivered also include 'Fab Food and Financial Folktales', a touring event focused on families and addressing holiday hunger, and 'Yes, Let's', a workshop hosted at the New Vic for families with SEND children built around creativity and sensory engagement to help young people develop social skills and confidence.

The work of the Education and Borderlines teams is more extensive than is generally known and of wider impact than is measurable in any isolated six-month period. It does, however, align closely with the Council's corporate priorities of 'healthy, active, and safe communities', and 'a successful and sustainable growing borough'. Feedback sought on individual projects has demonstrated that these strands of work are also helping to foster pride in local communities, a key aim of the Council.

The Trust is also the accountable body for Appetite, the Creative People and Places project whose consortium members include a number of the Borough Council's strategic partners, among them the Newcastle-under-Lyme BID, Go Kidsgrove and Keele University.

On 20 October, Appetite was successful in bidding for a further £1m in lottery funding to extend the programme, which includes projects and events in Newcastle and Kidsgrove, through to 2029. Members of the Council will be aware of the many successful elements of the Appetite programme, which have delivered (in addition to its headline aim of raising participation locally in arts and culture) meaningful support for the Council's strategic priority 'Town centres for all'. Events produced over the

past six months include the 'ArtSlam' competition in June, in the bowels of Astley Place.

I remain impressed by the excellent creative output of the New Vic, the professionalism and deserved success of its executive leadership. The Theatre continues to be a cultural and economic asset to the Borough and worthy of the Council's sustained financial and practical support.

Next meeting date:

The Trust Board has met on two occasions over the past six months and will meet again on 26 November.

MEMBER BI-ANNUAL REPORT TO COUNCIL

Outside Body: **Go Kidsgrove**

Submitted by: **Cllr Craig Skelding**

Update:

Meeting on 22nd July:-

- Shine on Kidsgrove Lantern parade - 29th November
- Heritage trails and walks – to be discussed further at the next meeting
- Town Deal (Cllr Waring)
- Totally Locality (a voluntary group) - decided not to pursue further
- Flowers and planters – to set up a a voluntary group in the New Year – to be discussed further at the next meeting.

The October meeting was cancelled.

Next meeting date:

Tbc in February

Actions arising from the Meeting:

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QUESTIONS TO THE MAYOR, CABINET MEMBERS AND COMMITTEE CHAIRS

To the Portfolio Holder for Community Safety and Wellbeing:

1. I'm pleased that Newcastle-under-Lyme Borough Council has been recognised with the Employer Recognition Scheme Bronze Award for its support of Armed Forces veterans. This reflects the council's commitment to supporting veterans, reservists, service families, and cadet volunteers.

Can the Portfolio Holder confirm whether the Council intends to build on this success by working towards silver and gold level recognition, further strengthening its support for the Armed Forces community in the Borough?

Cllr. Nick Crisp

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To the Leader of the Council:

2. Following last week's announcement that Newcastle Town Centre Business Improvement District (BID) has successfully secured its re-ballot, alongside the Town Centre's outstanding achievements in the Heart of England and National Britain in Bloom awards, Will the Leader join me in congratulating the BID team and council staff on these successes, and outline how the council intends to build on this and work with the BID to further enhance the vitality and attractiveness of our town centre for businesses, residents, and visitors?

Cllr. Andrew Parker

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