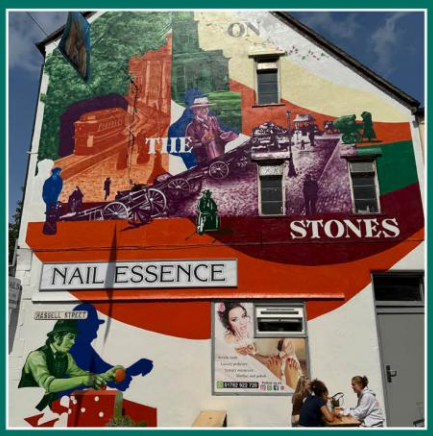


Submission for Local Government Reorganisation

NEWCASTLE·UNDER·LYME
BOROUGH COUNCIL

Contents

Foreword 3

Executive summary 4

1. National and local context 7
2. Vision and strategic objectives 11
3. Our approach 13
4. Our proposal for LGR 30
5. Resident and stakeholder engagement 40
6. Service delivery and ways of working 45
7. Financial case 67
8. Democracy 78
9. Our plan for transition and implementation 80
10. Risks, dependencies and mitigations 86
11. Our asks of Government 89
12. Appendices 91
13. References 200

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.

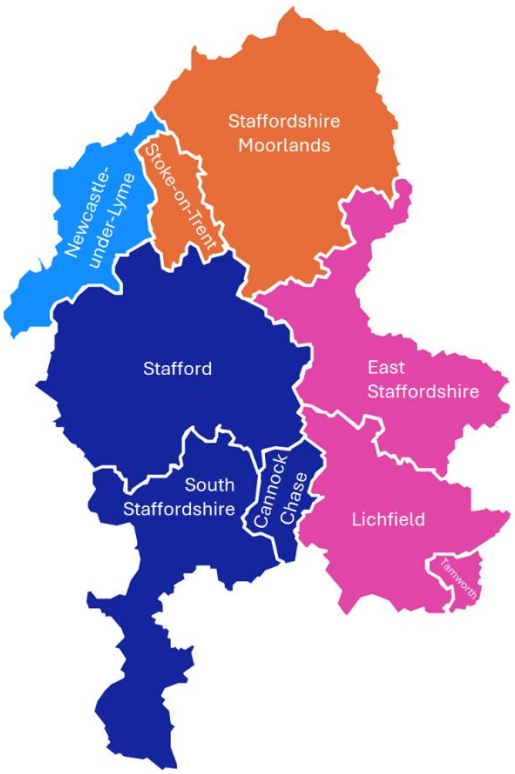
Cllr. Simon Tagg, Leader of the Council

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 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 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.

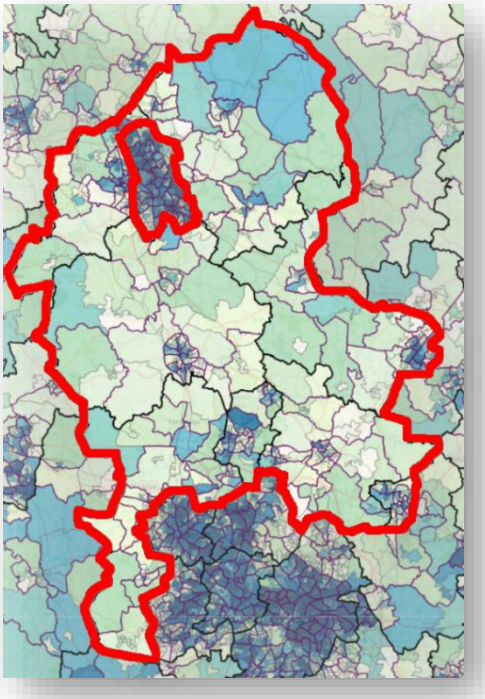


Figure 1: map of LSOAs shaded by IMD decile, with Staffordshire County Council and Stoke-on-Trent City Council boundaries in red[2]

- 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

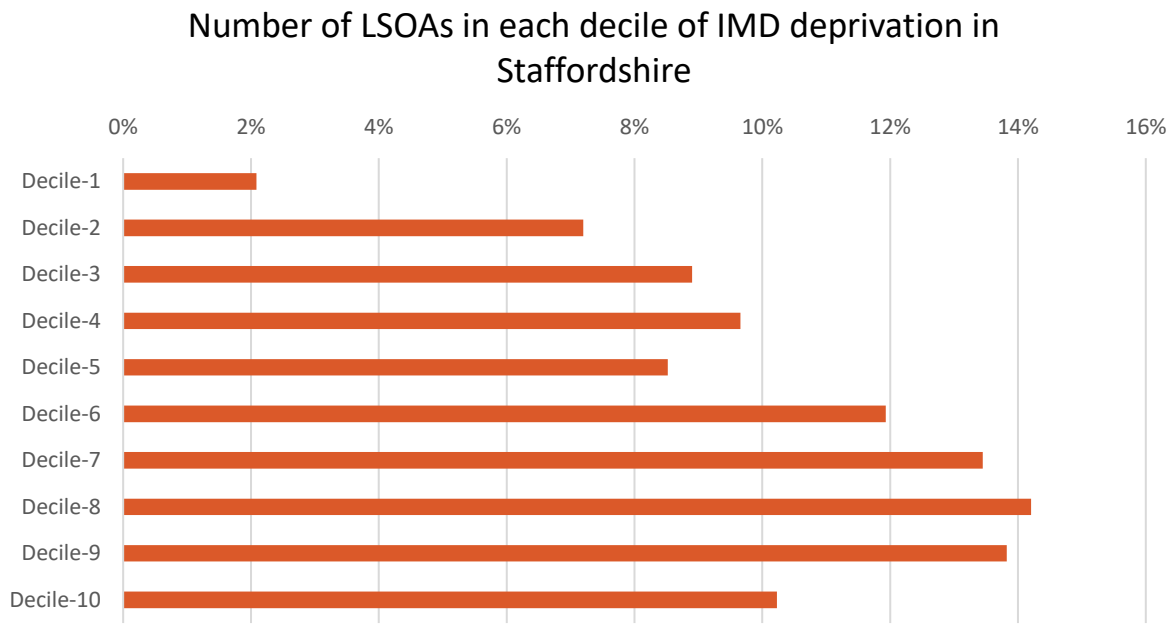


Figure 2: LSOA analysis of IMD demonstrating variable deprivation across Staffordshire

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.

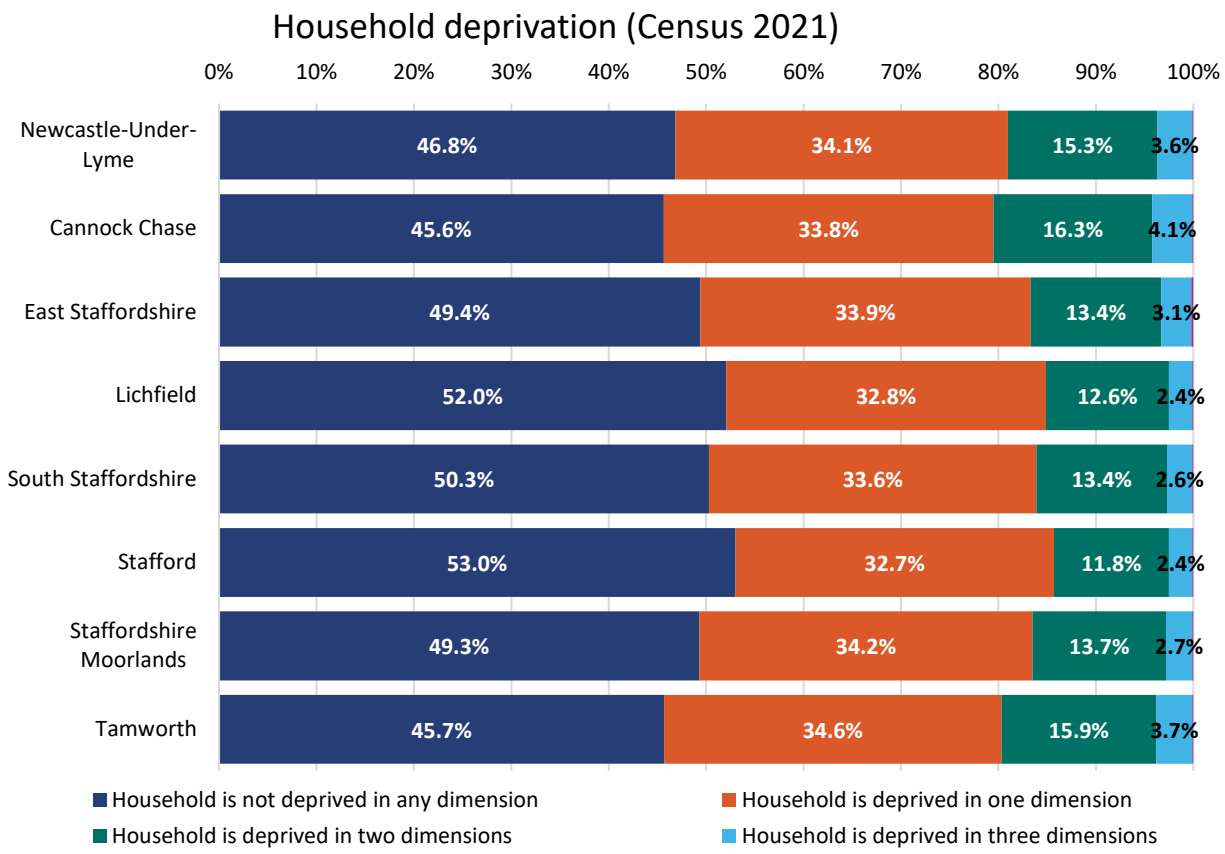
Outside of Stoke-on-Trent, a more focused analysis of the data clearly shows that there is some level of comparability in the levels of deprivation across many of the existing district and borough councils within the county, with some exceptions (e.g. Newcastle-under-Lyme; Cannock Chase). This relative 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 dimension[3]



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

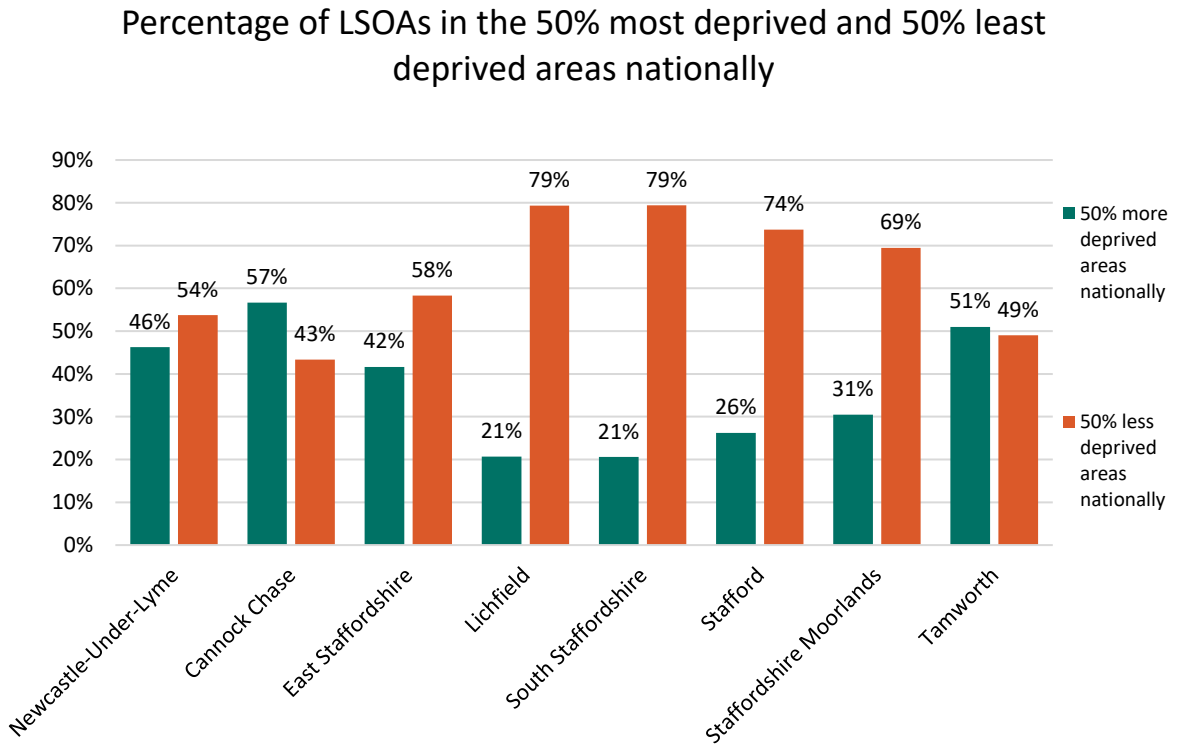


Figure 5: IMD profile of Staffordshire districts

- 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

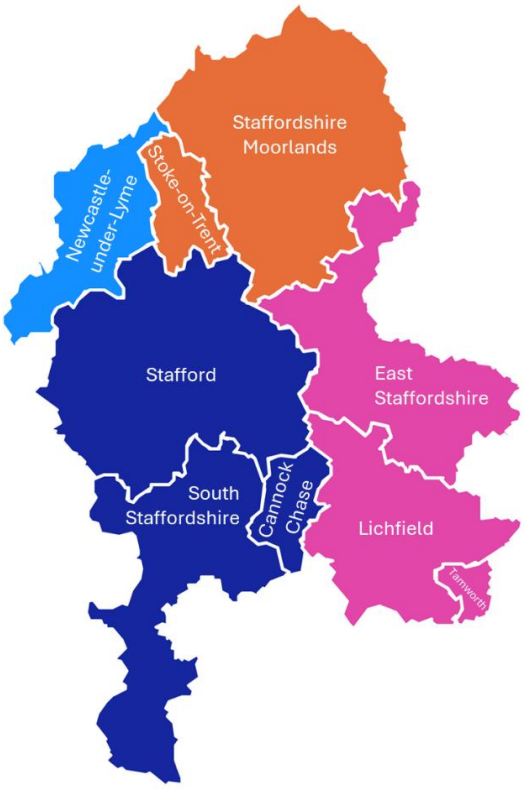


Figure 6: map of option 1

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

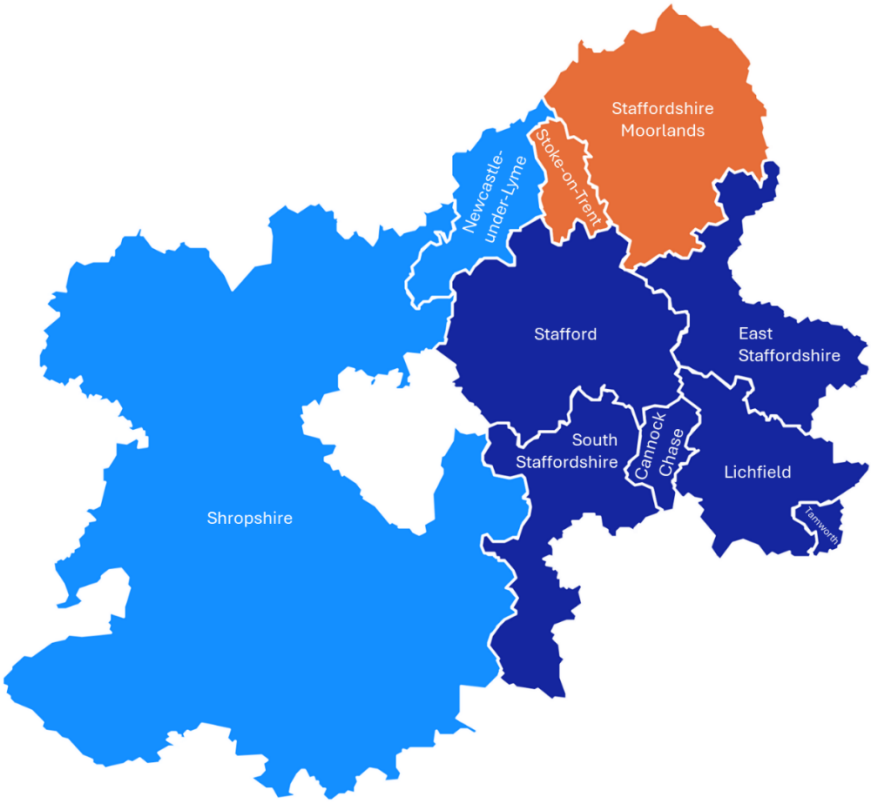


Figure 9: map of option 4

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

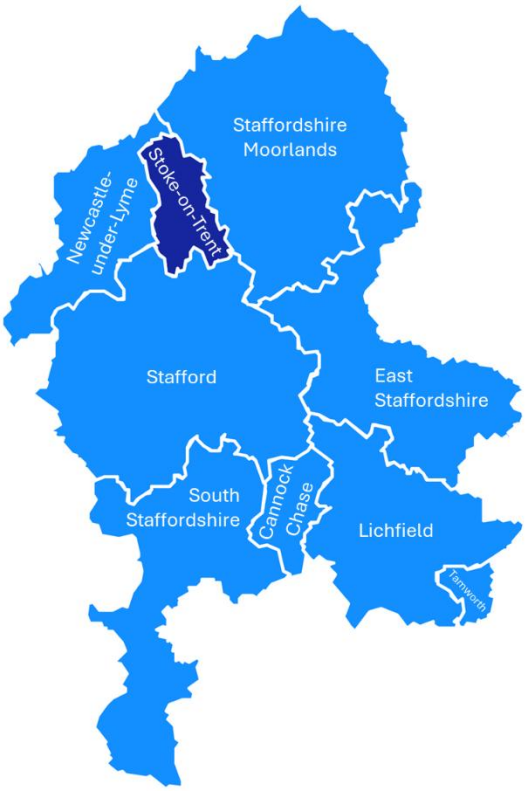


Figure 10: map of option 5

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 *potential* for ongoing financial savings • Lowest council tax harmonisation challenge • More complex to disaggregate reserves and resources equitably	• Higher *potential* for ongoing financial savings • Does not burden new communities with financial pressures and debt accrued at Stoke-on-Trent	• Higher *potential* 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 *potential* for ongoing financial savings	• Higher *potential* 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

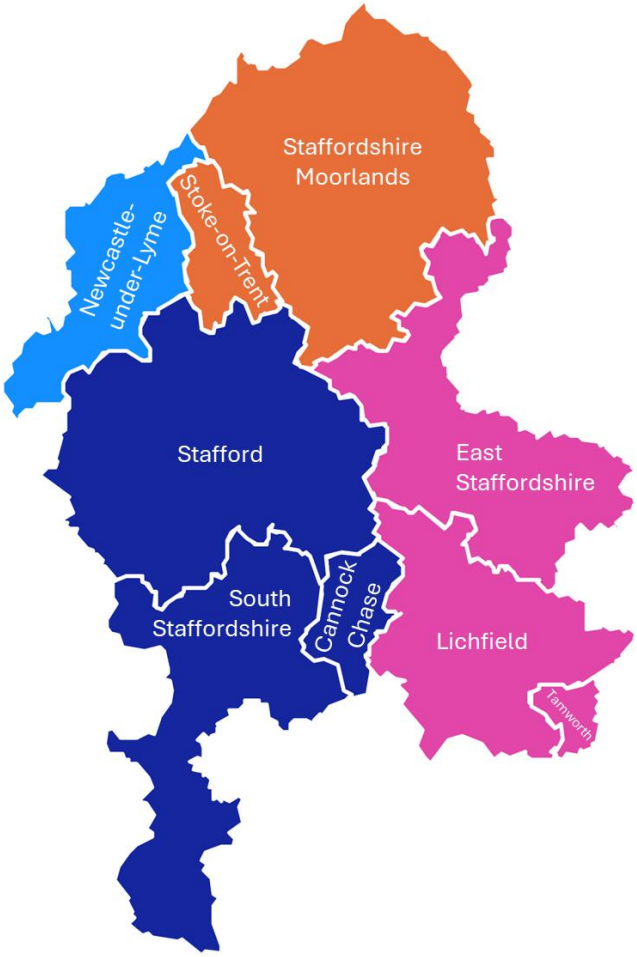


Figure 11: our proposal for Local Government Reorganisation (LGR)

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 lines[4], 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

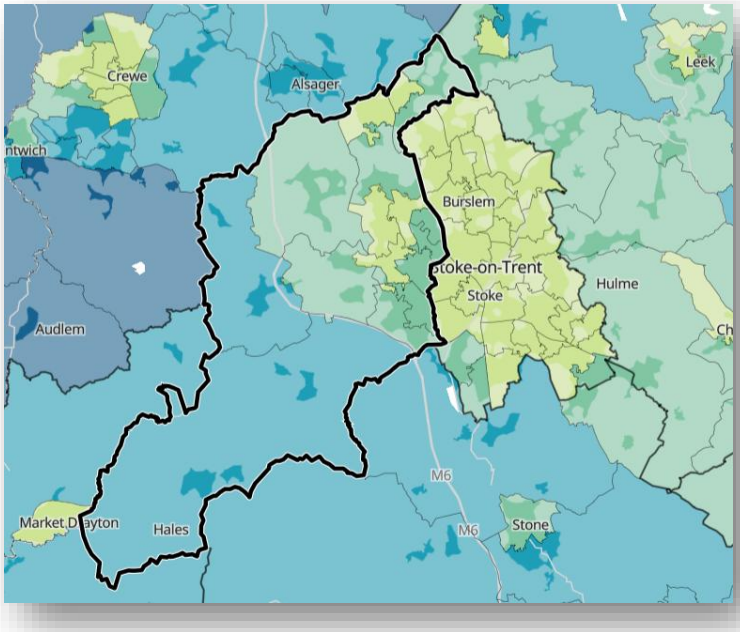


Figure 12: distribution of working adults over 16 years of age who work from home, where darker colours indicate higher prevalence of homeworking. Data shows a step change in behaviour in the north and south of the borough, across rural semi-urban and urban communities[5]

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

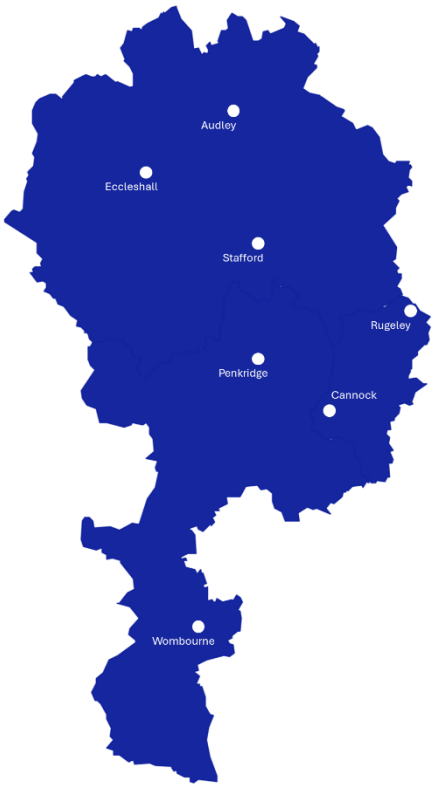
- Like all authorities in all options, deeply collaborative working will be required across the region, particularly in disaggregated Staffordshire County Council services. This is not only to fully exploit benefits of the MSA but also to ensure service continuity. For example, analysis of asset GIA 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 beyond[6]

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

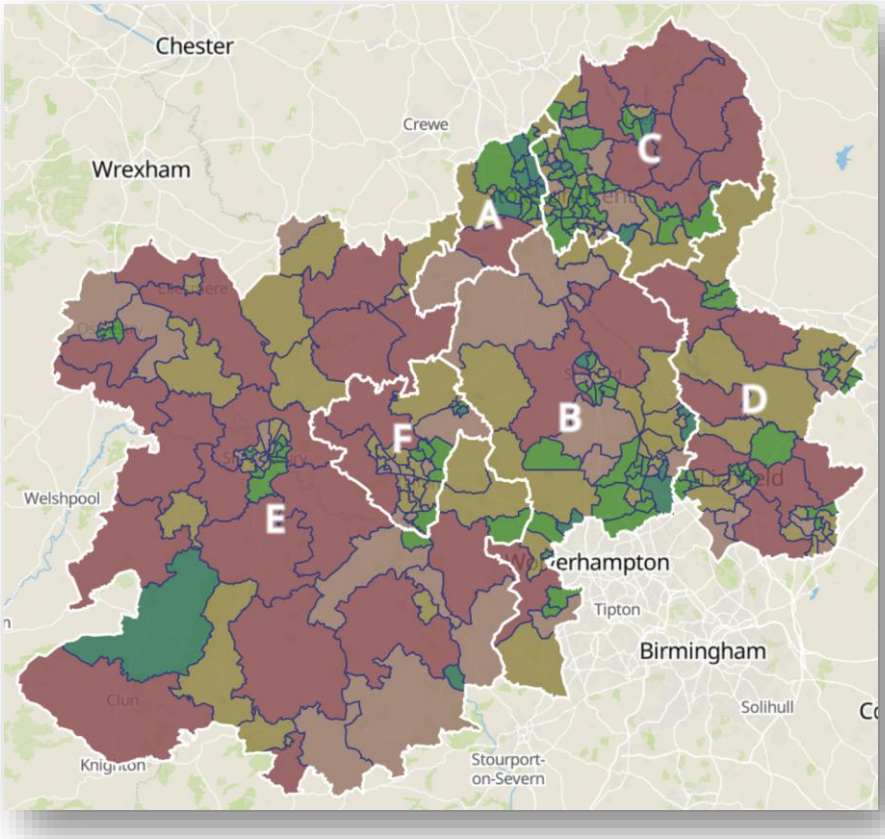


Figure 13: barriers to housing across proposed geographies, where green indicates low housing barriers and red indicates high housing barriers, including Shropshire (unitary E) and Telford & Wrekin (unitary F)

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 Surrey[7])

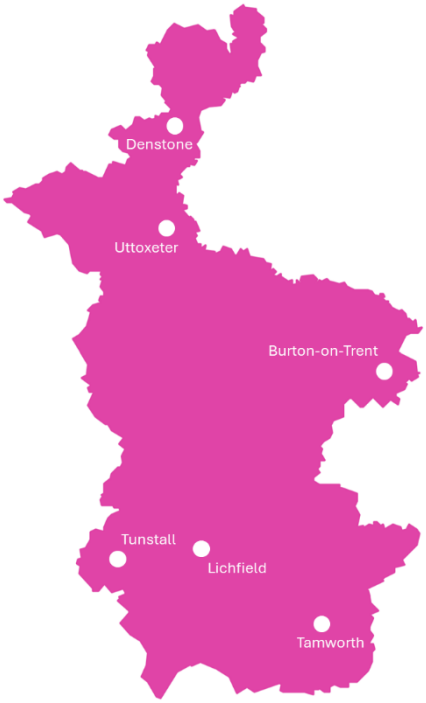
- There are 43 precepting parishes, all of which are within Staffordshire Moorlands, and these charges will remain a local choice for these authorities
- Adoption of new LDPs, estimated in 2027 and 2028 across the region, provide the key opportunity for development and expansion of the tax base to outperform 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 delivery[8], 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 expectancy[9]

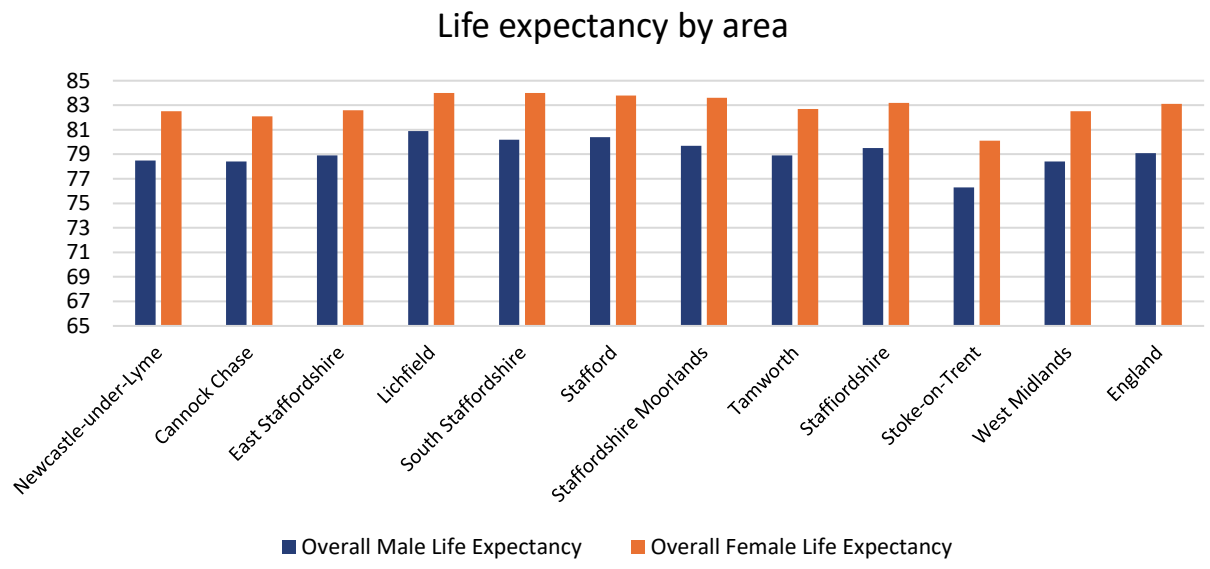


Figure 15: life expectancy by area

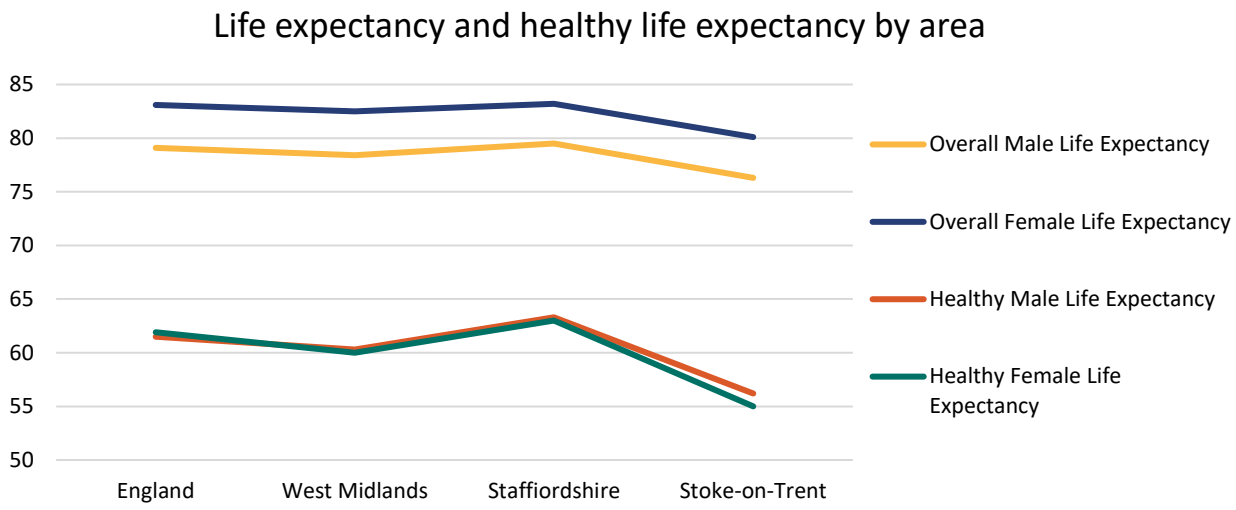


Figure 16: life expectancy vs. healthy life expectancy by area

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

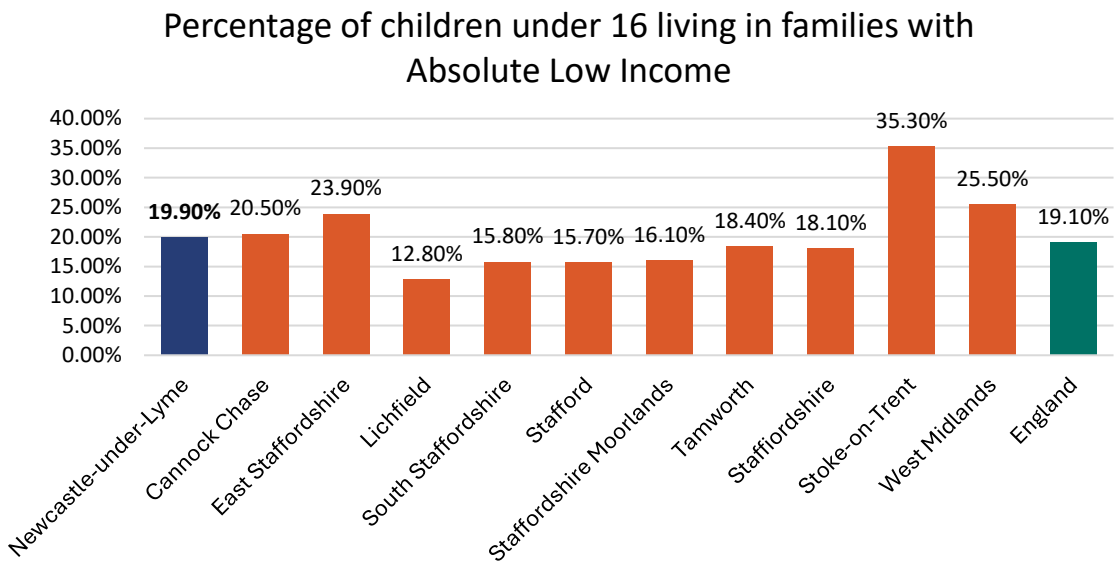


Figure 18: absolute low income

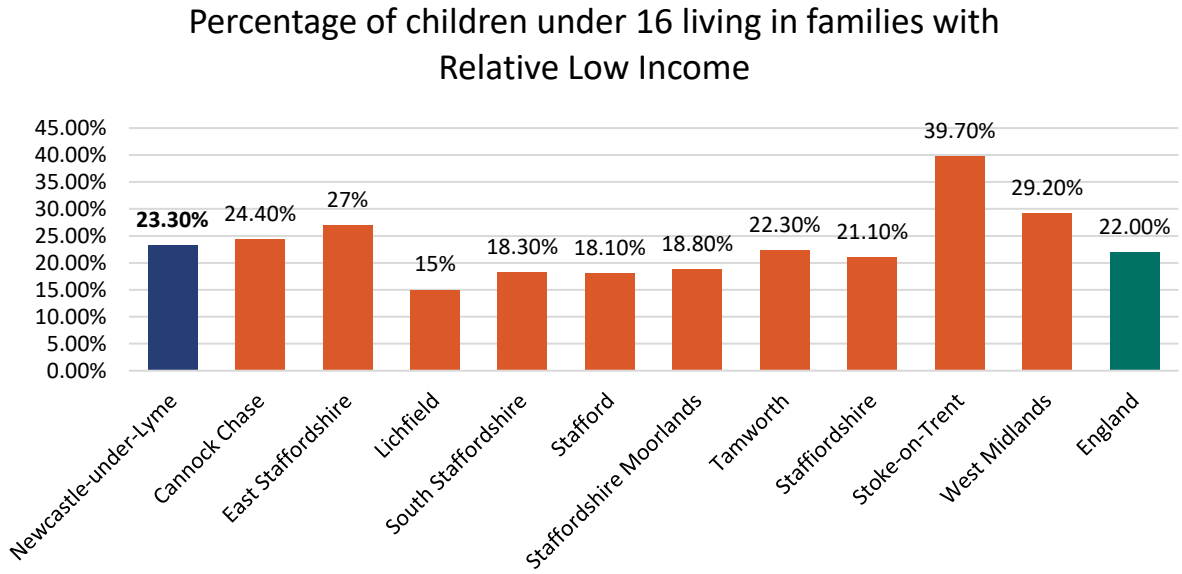


Figure 19: relative low income

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).

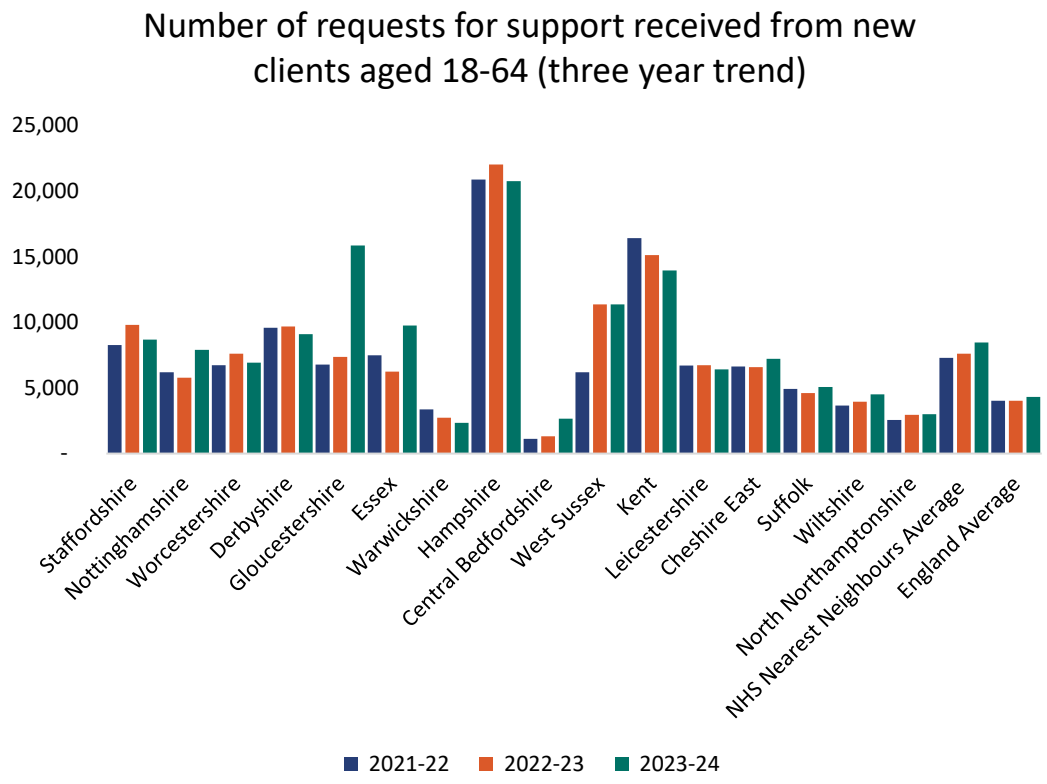


Figure 20: requests for support (new clients aged 18-64)

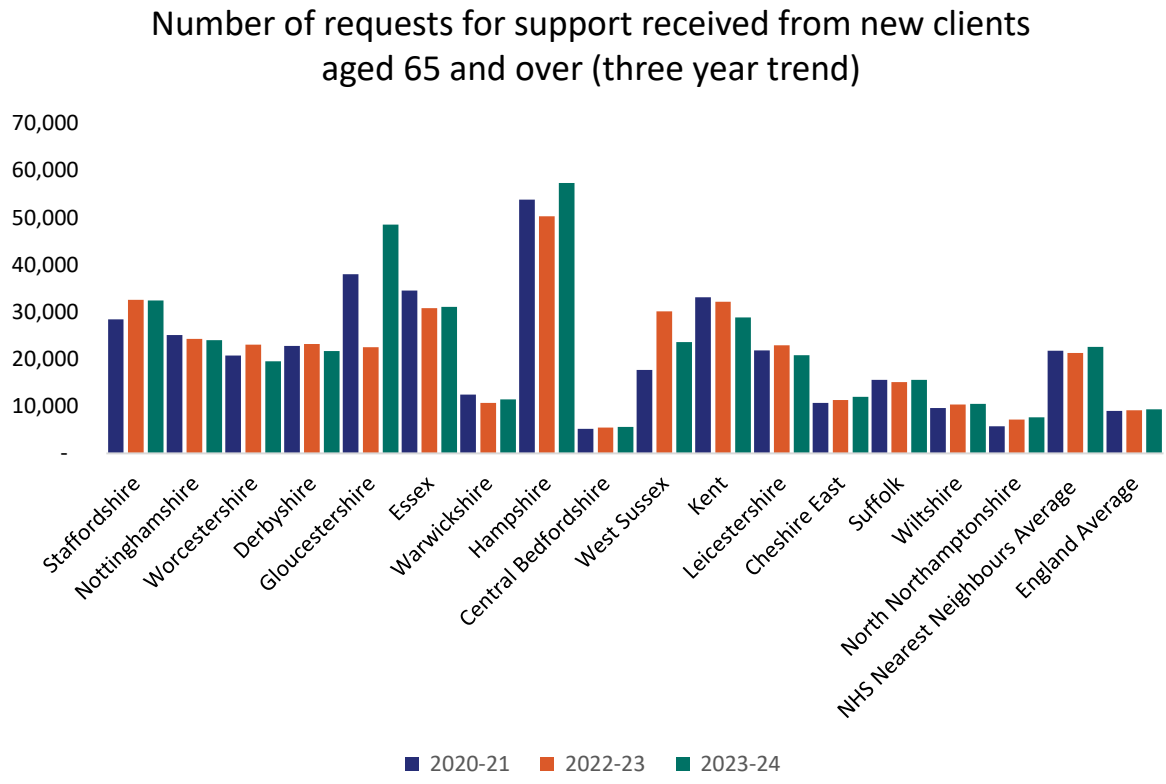
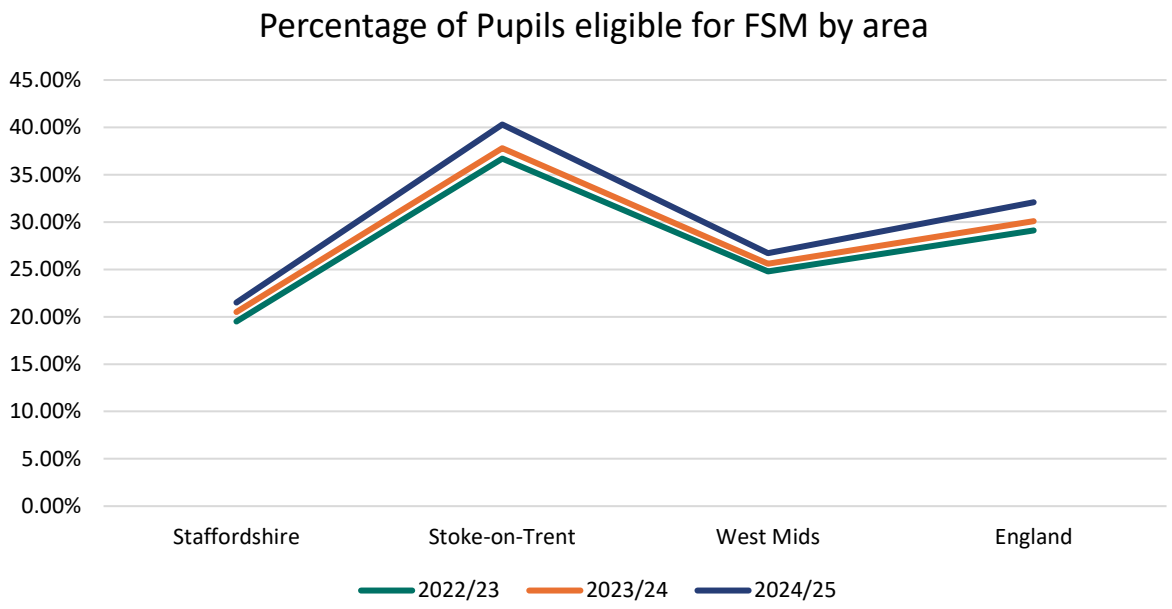


Figure 21: requests for support (new clients aged 65+)



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 characteristics[10]

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

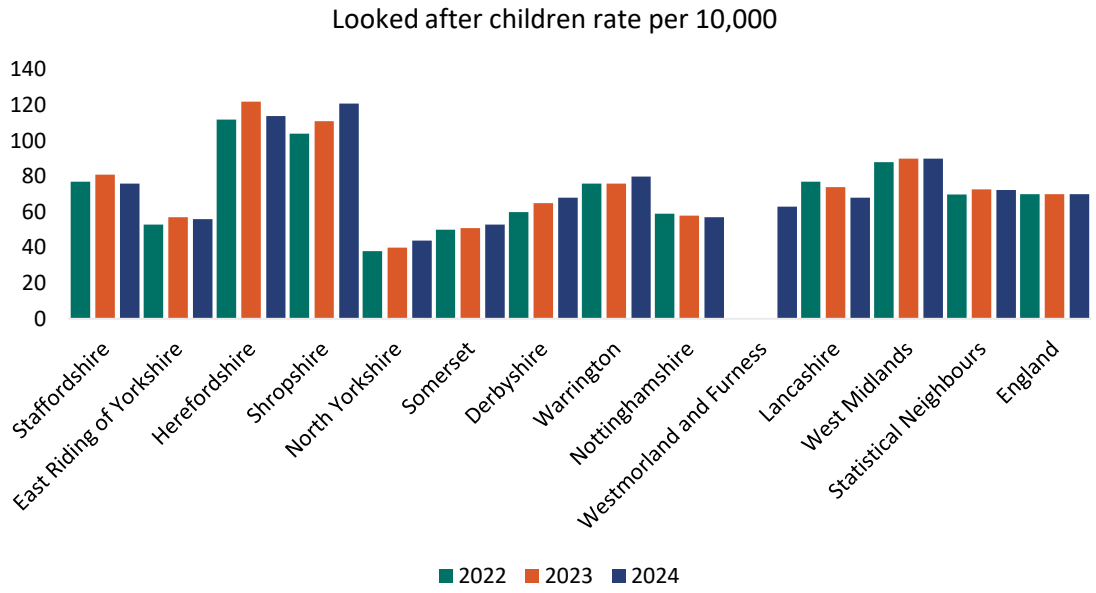


Figure 23: looked after children rate

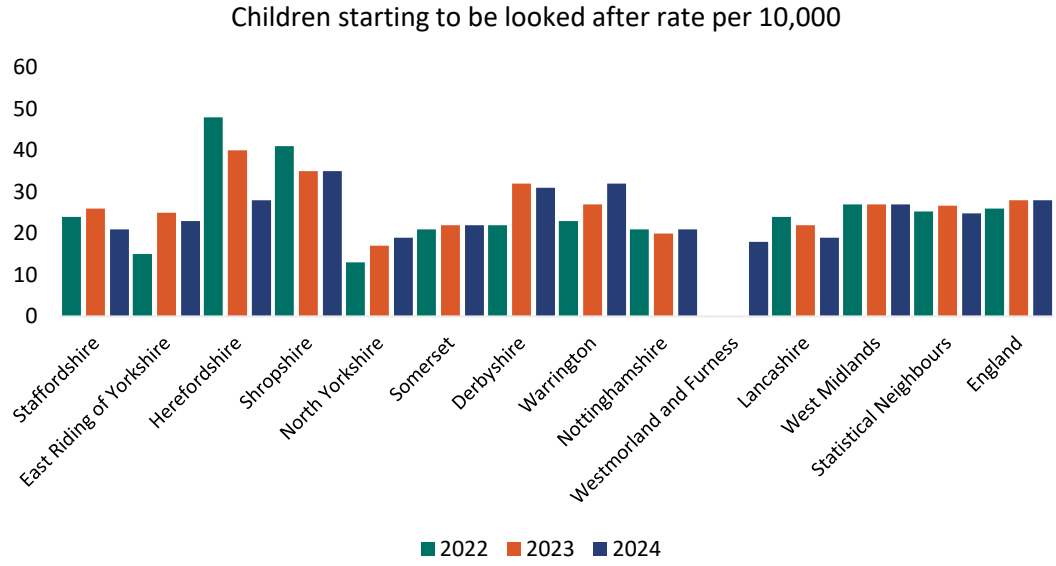


Figure 24: children started to be looked after rate

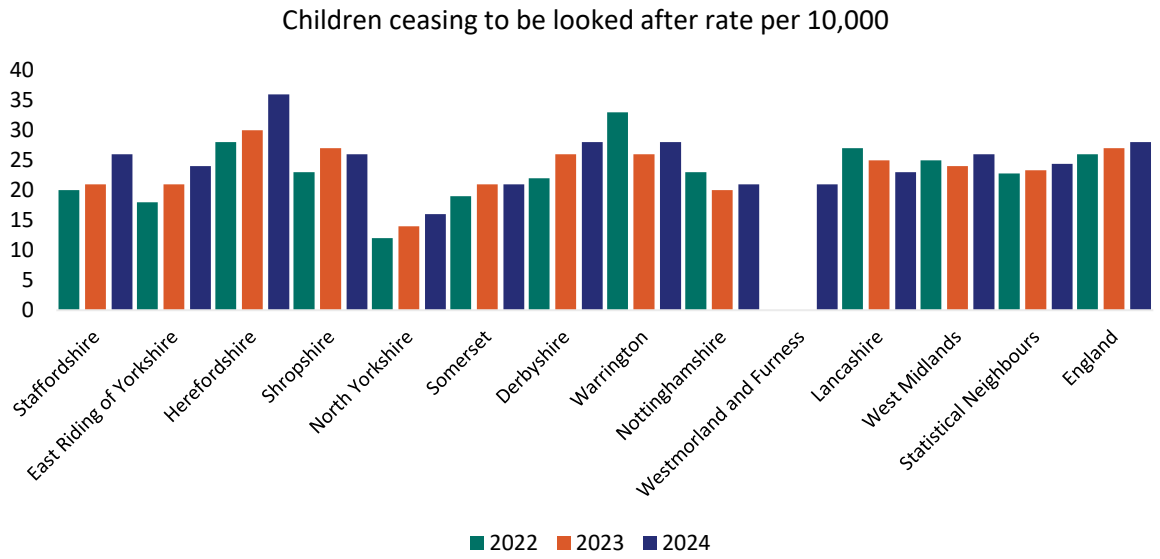


Figure 25: children ceasing to be looked after rate

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.

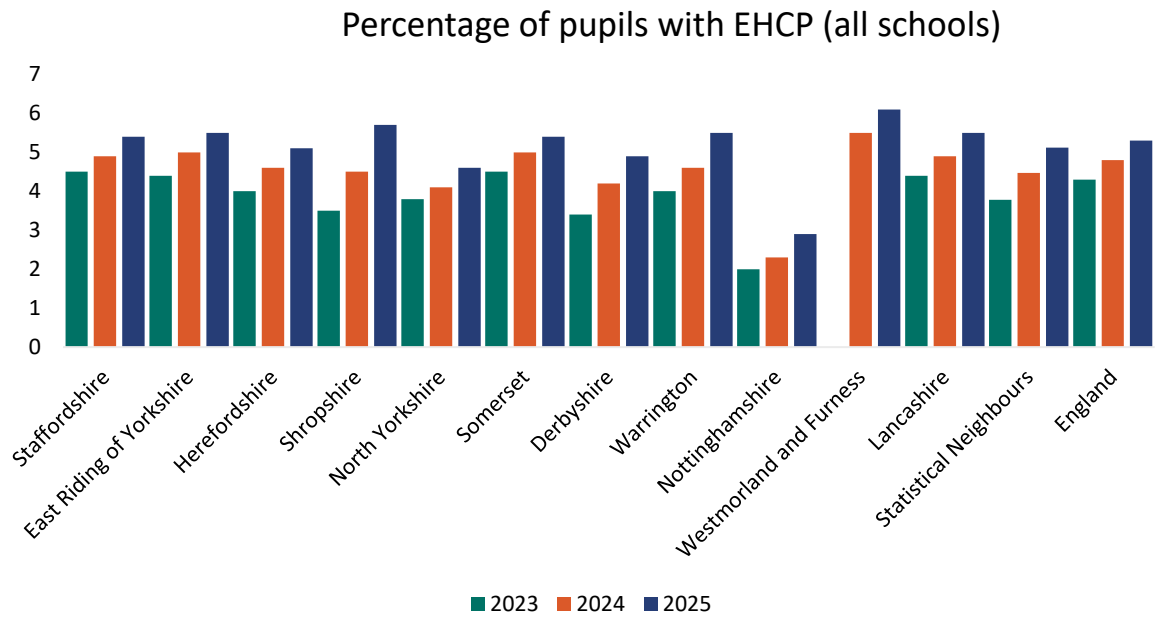


Figure 26: percentage of pupils with EHCP

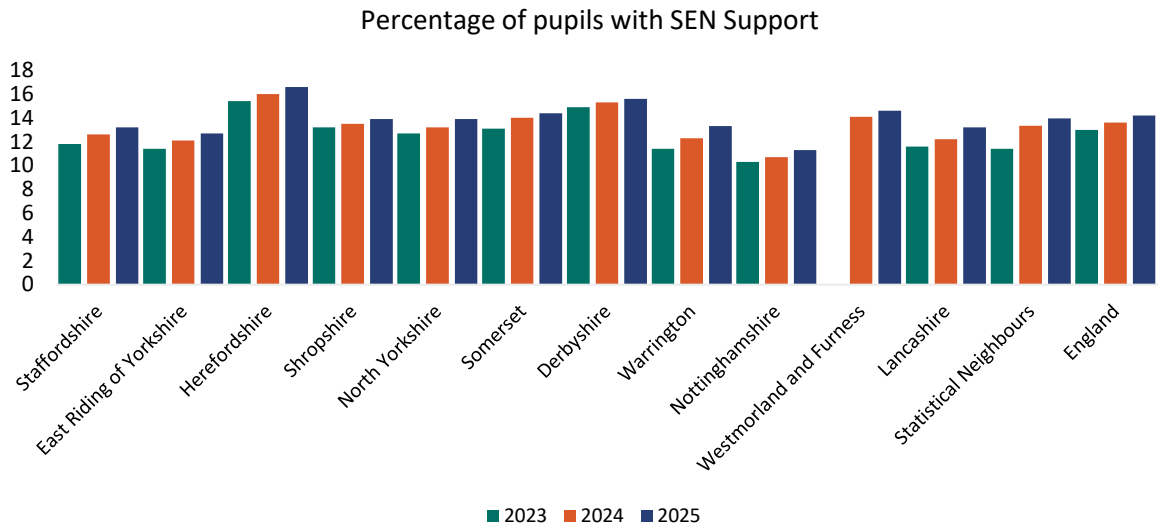


Figure 27: percentage of pupils with SEN support

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

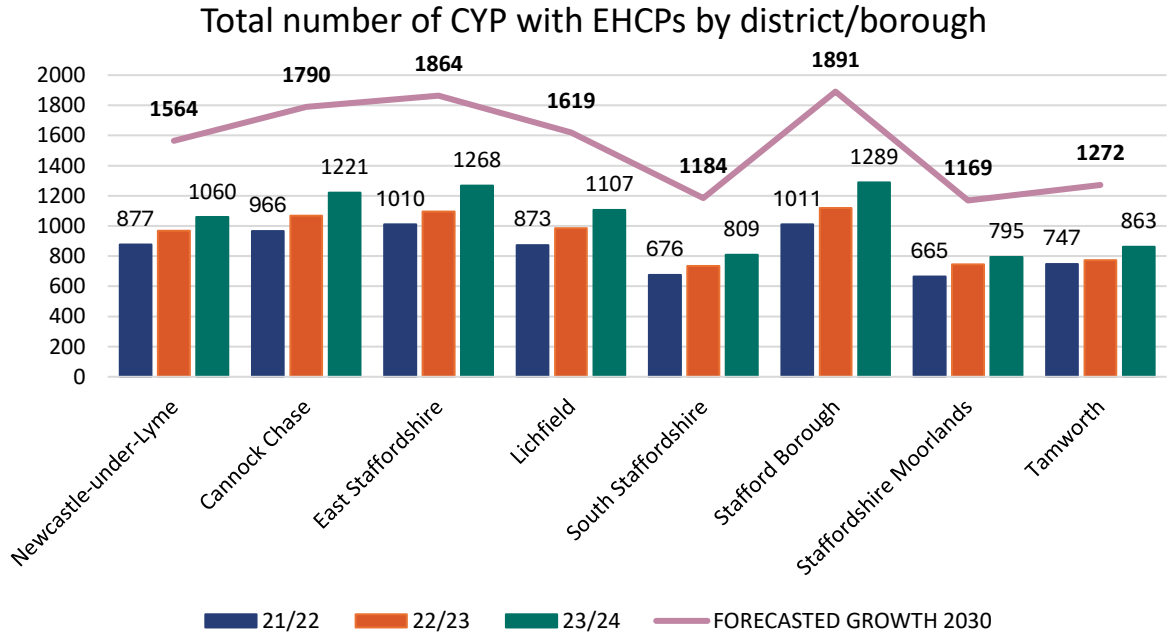


Figure 28: total number of CYP with EHCPs

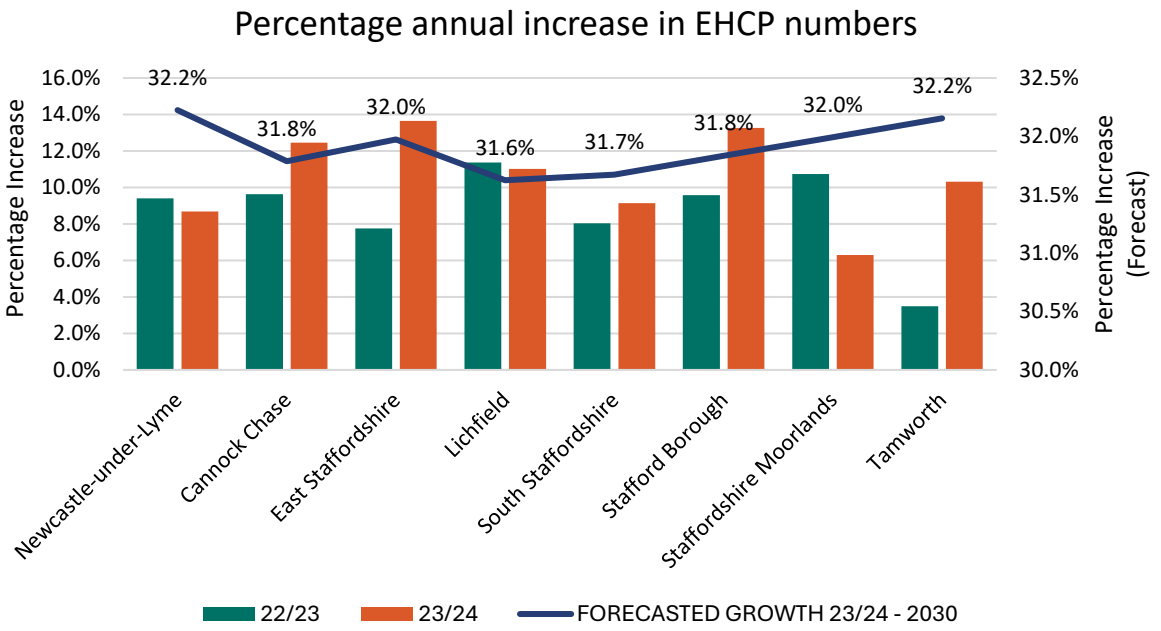


Figure 29: EHCP increases

Proportion of registered pupils with SEND by Districts

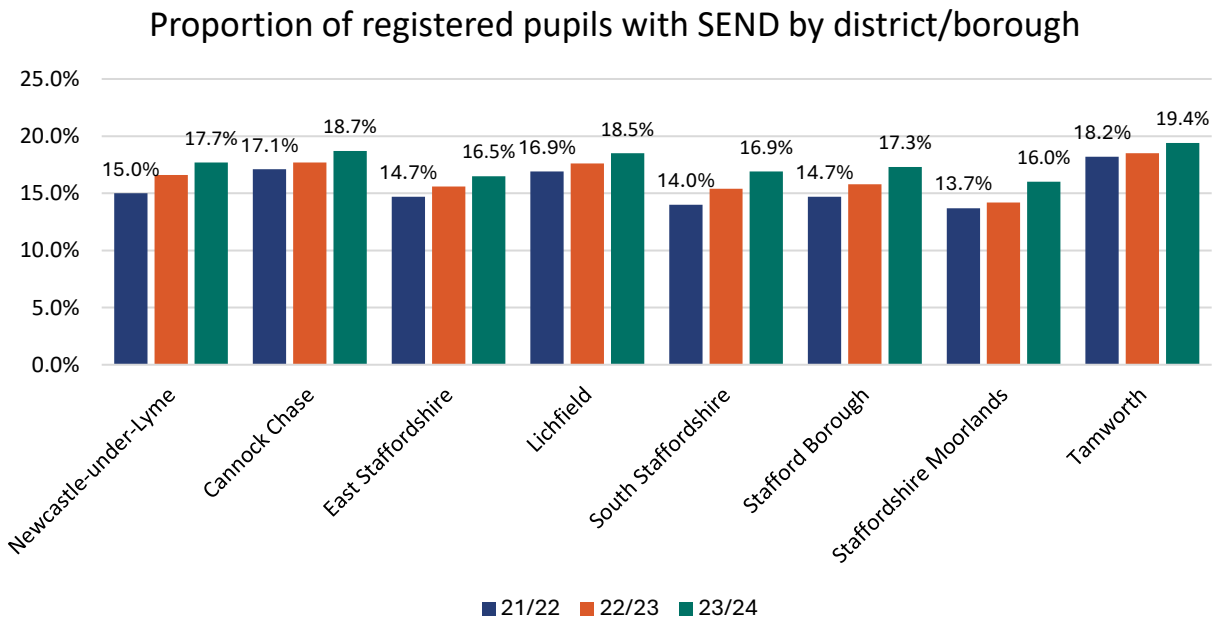


Figure 30: proportion of registered pupils with SEND

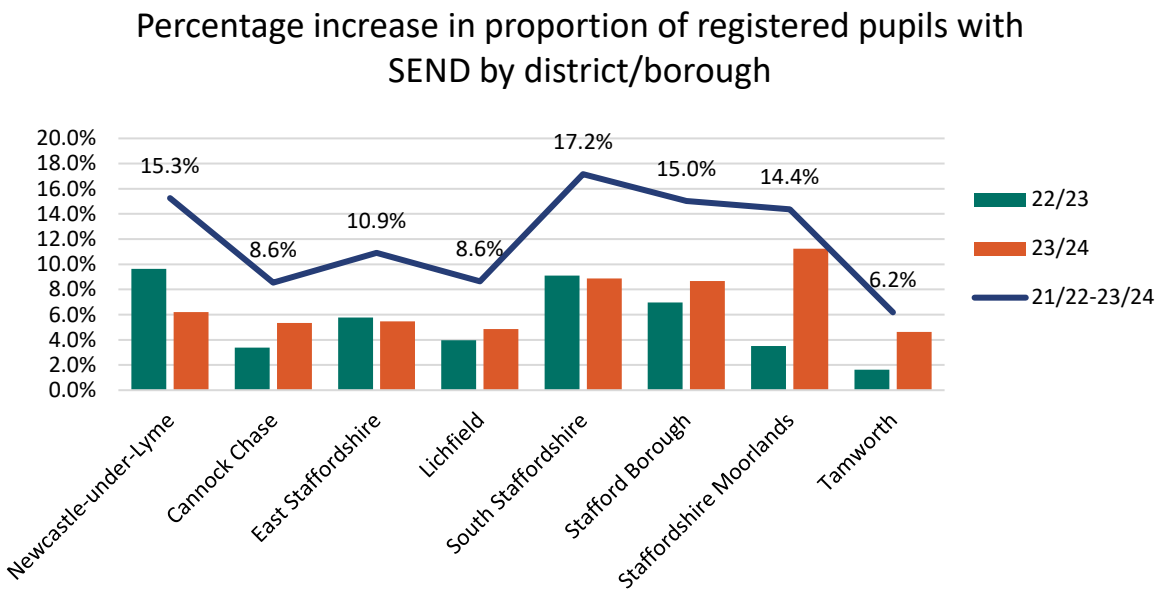


Figure 31: percentage increase in registered pupils with SEND

- 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 *structural* financial pressure. However, ongoing financial support conversations at Shropshire were not included in RA returns and the structural position at Shropshire is considered a *risk*.
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 reported[11] 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).

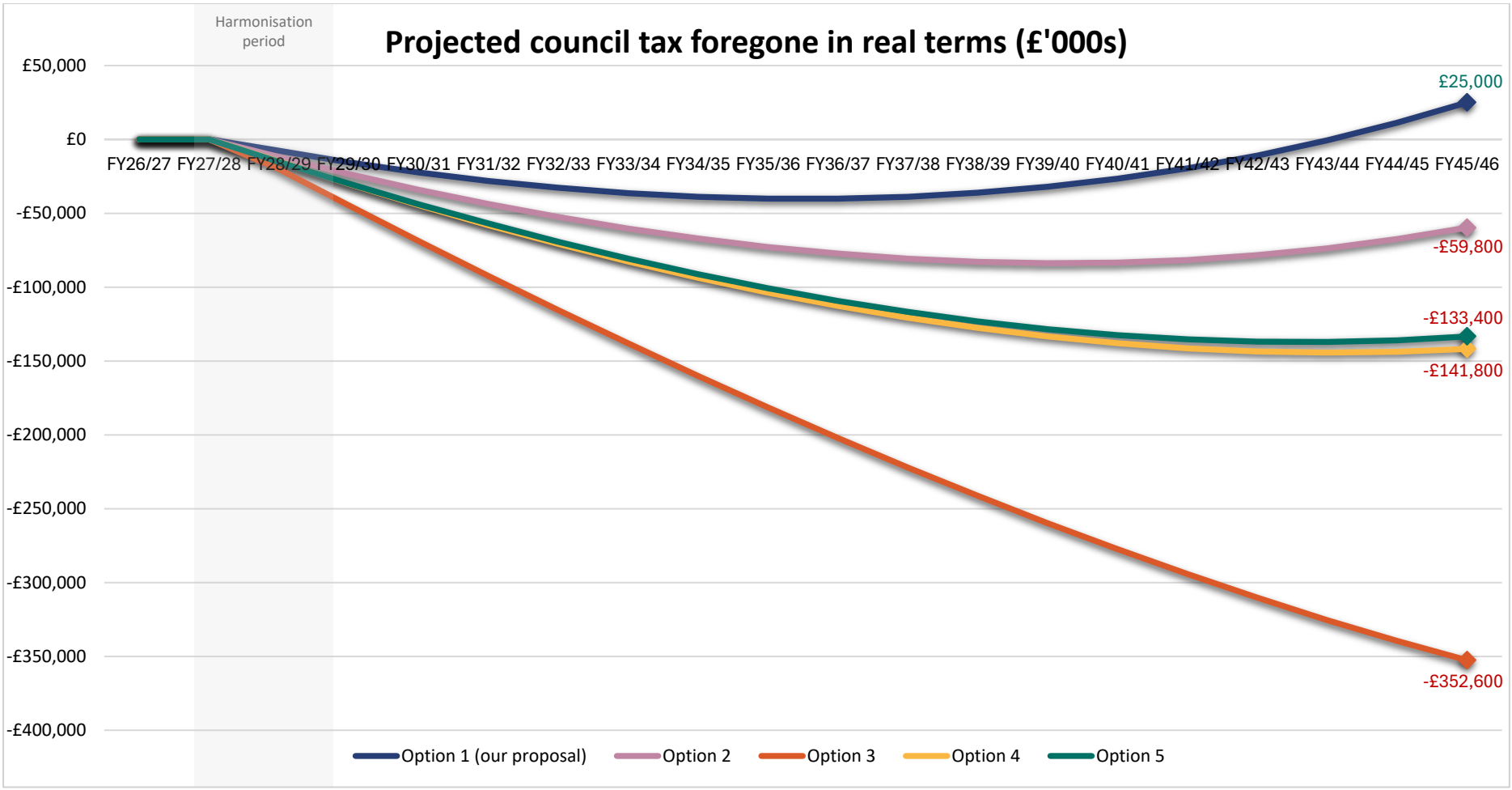


Figure 32: potential real terms cost of council tax harmonisation across the Staffordshire and Stoke-on-Trent area, relative to the current system of two-tier local government.

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:

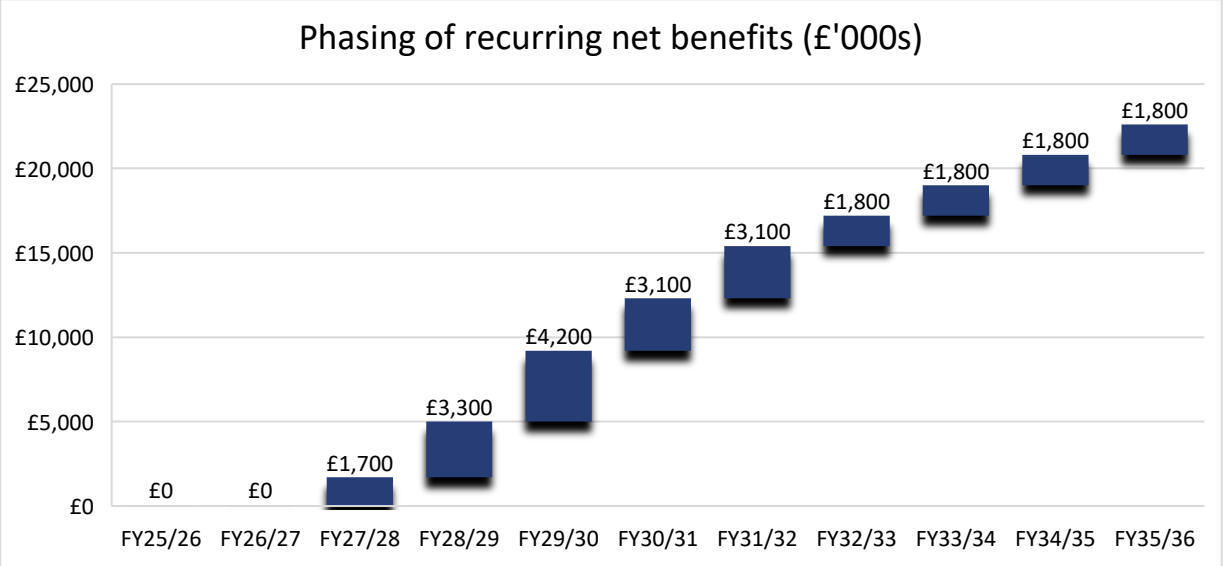


Figure 33: phasing of recurring transformation benefits across Staffordshire and Stoke-on-Trent, rising to £22.6M per annum by FY35/36

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.

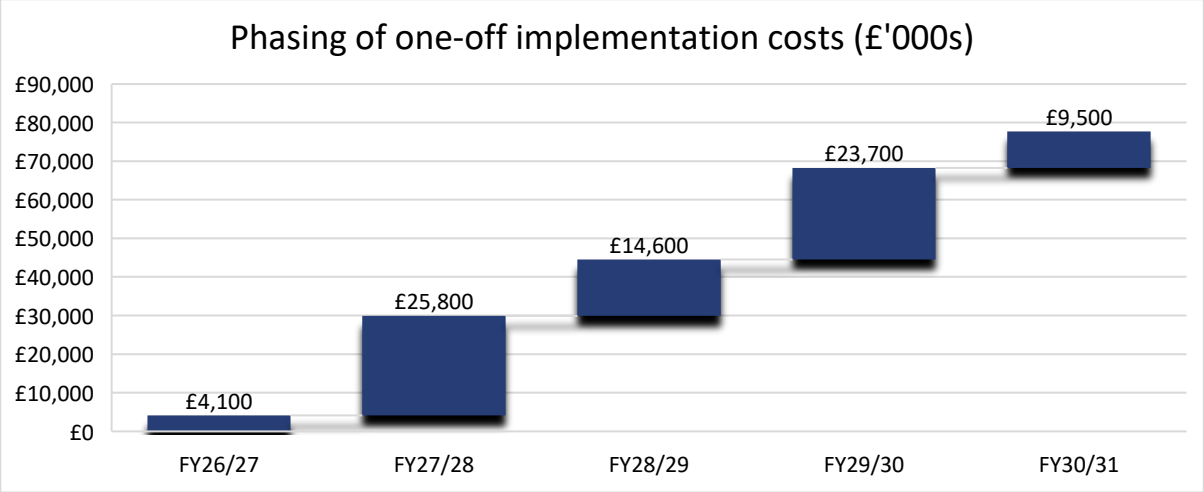


Figure 34: phasing of upper range £77.7M one-off implementation costs across Staffordshire and Stoke-on-Trent

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:

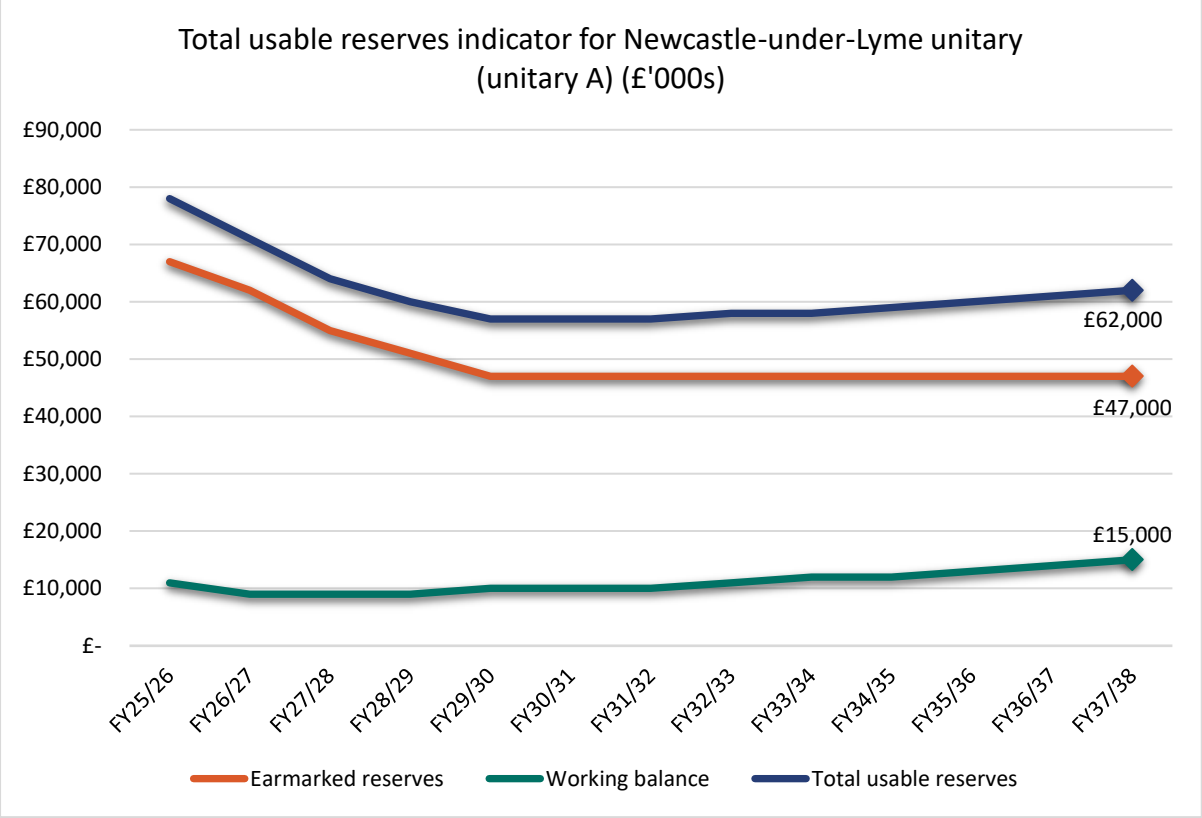


Figure 35: total usable reserves indicator for Newcastle-under-Lyme unitary (unitary A)

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

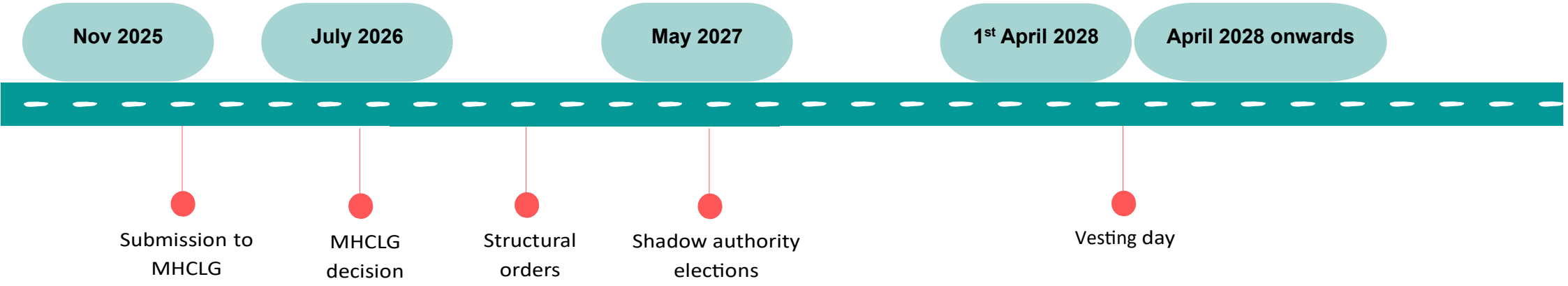
Engaging stakeholders throughout the transition will be critical to maintaining confidence and ensuring successful delivery. Our approach will focus on clear, consistent communication, proactive collaboration, and transparency at every stage. We will provide regular updates, host workshops to clarify 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

Laying the foundations for successful transition by establishing governance, engaging with Government to ensure alignment, building a robust evidence base to inform planning, planning delivery, engaging stakeholders, and establishing joint working to ensure readiness and collaboration

DESIGN

Shaping the new authority's operating model, governance, and readiness for vesting day, while ensuring robust systems, legal foundations, and ongoing engagement to ensure a smooth and transparent transition

TRANSITION

Bringing the new authority to life by standing-up governance, mobilising structures, completing migrations, aligning contracts, launching communications, and ensuring safe service delivery on vesting day while stabilising operations

TRANSFORMATION

Making our vision for Local Government Reorganisation in Staffordshire a reality by embedding efficiencies, driving service and organisational redesign, embedding cultural integration, and sustaining transparent communication to deliver long-term benefits for the new council

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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BOROUGH COUNCIL

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)

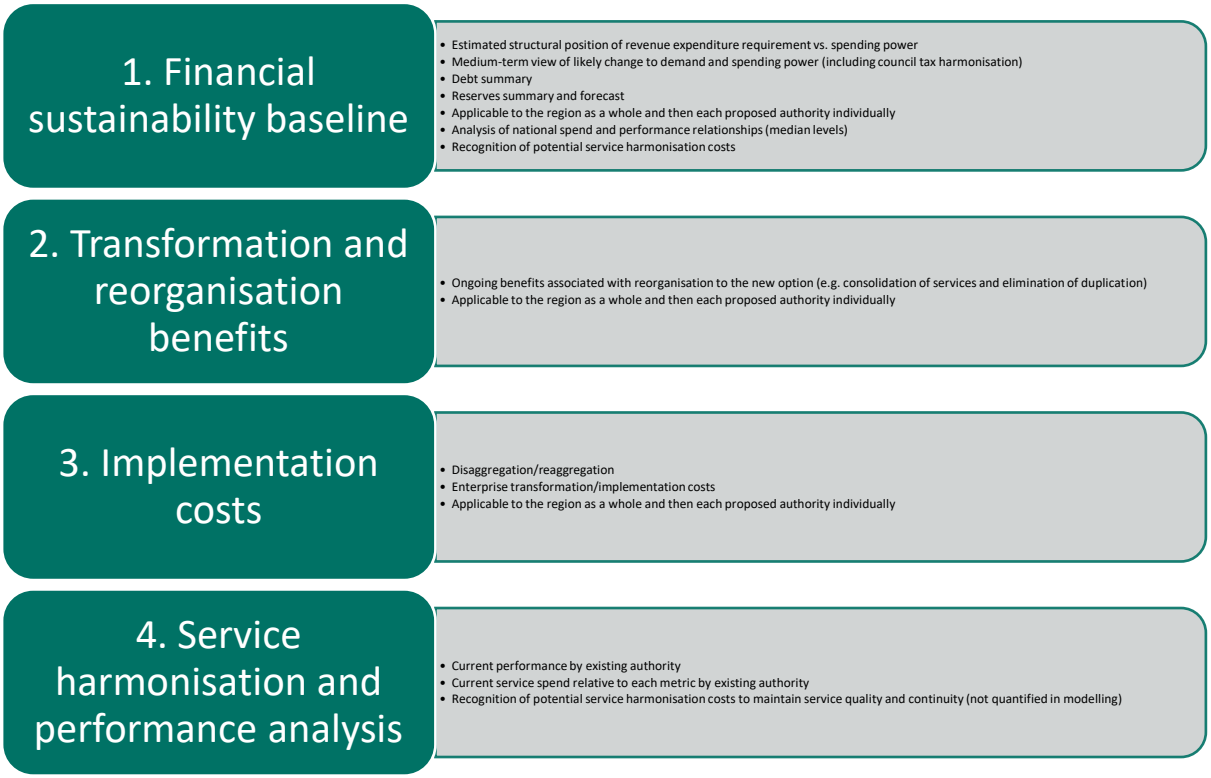
Appendix 7: interim plans and feedback

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 2.0[12]

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]
- IMD[20]
- Collection rates[21]

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 estimates[23] and annualised forecast percentage population increase
    ii. Forecasting spending power by:
        - Introducing forecasts of major funding components (e.g. Retained business rates and RSG) where they are known; or
        - 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 authority[26] (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 area[27]. 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 elections[28]. 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 roles[25].

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 *likelihood* 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 analysis[30]. 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

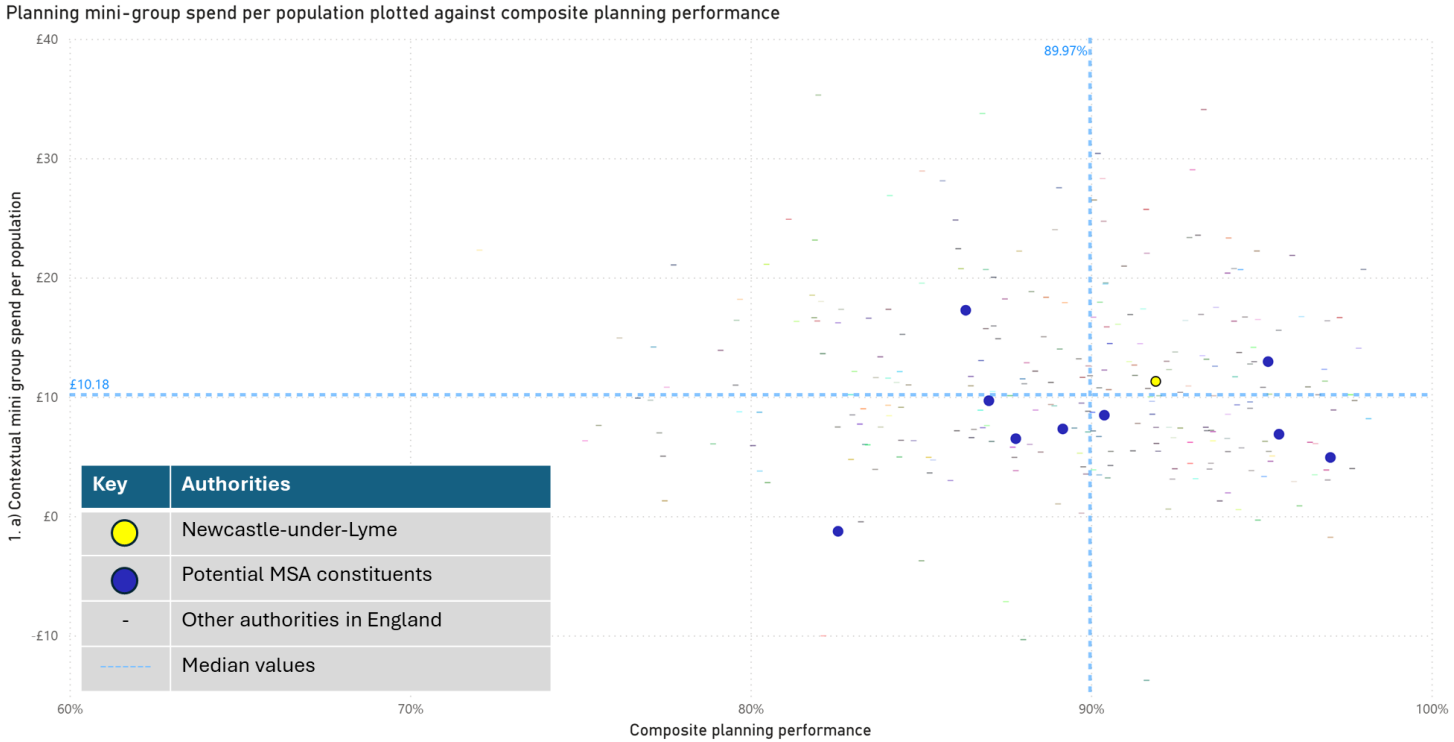
Calculate median expenditure per mini group at each authority in Staffordshire, alongside a national median. Adjust national median to compare authorities of different types. Example adjustments:

- 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

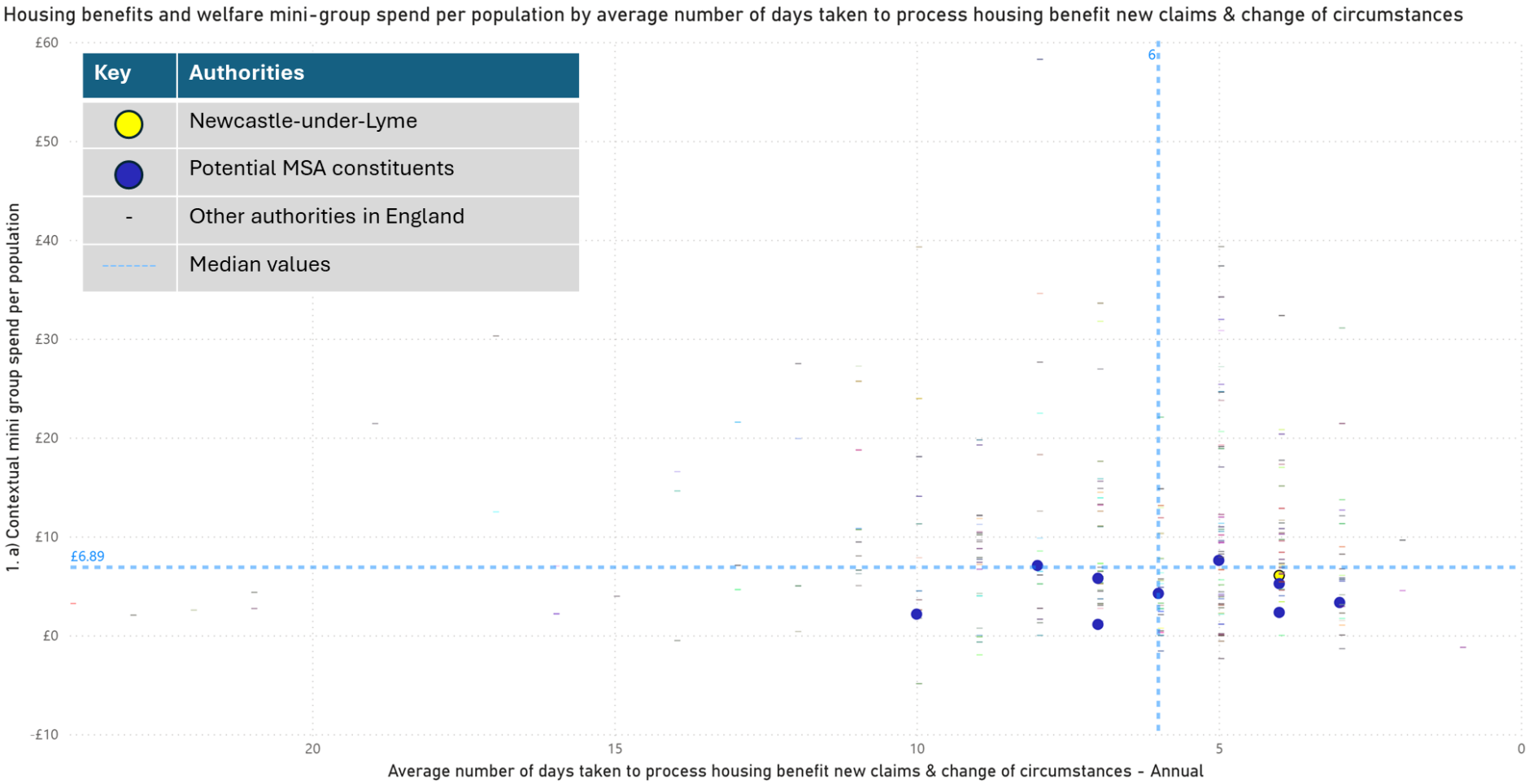
Visualise mini groups and performance data, as a basis to understand overall spending relative to national medians and performance. Visualisations (below) highlight current authorities within the *potential* MSA region against a national dataset configured by authority type (district, county, unitary,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

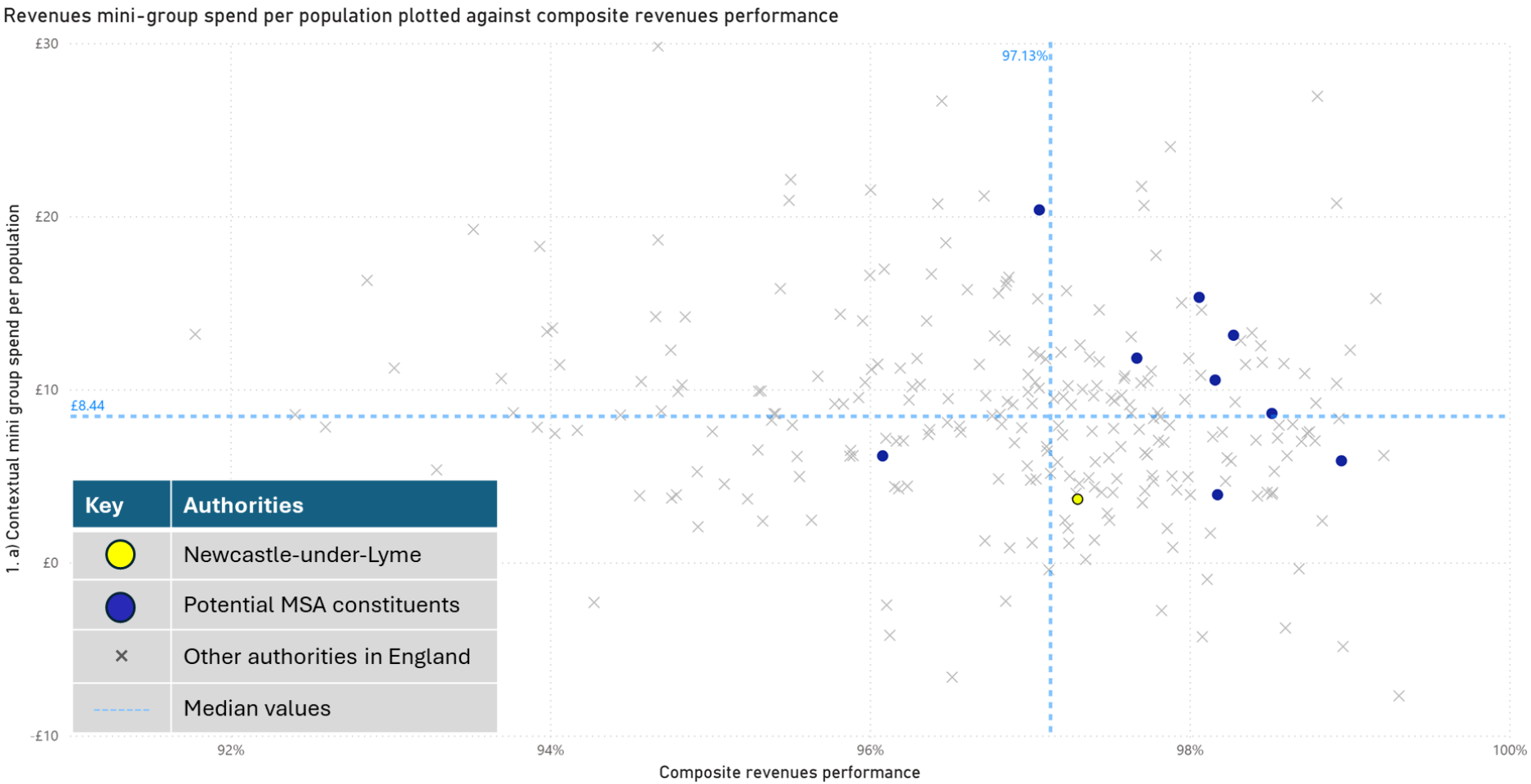


Planning mini group net expenditure per capita (across for shire district, unitary, metropolitan borough and London borough authorities) plotted against a *composite of planning performance (FY24/25).* This comprises four weighted metrics, with the heaviest weighting applied to major applications on 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

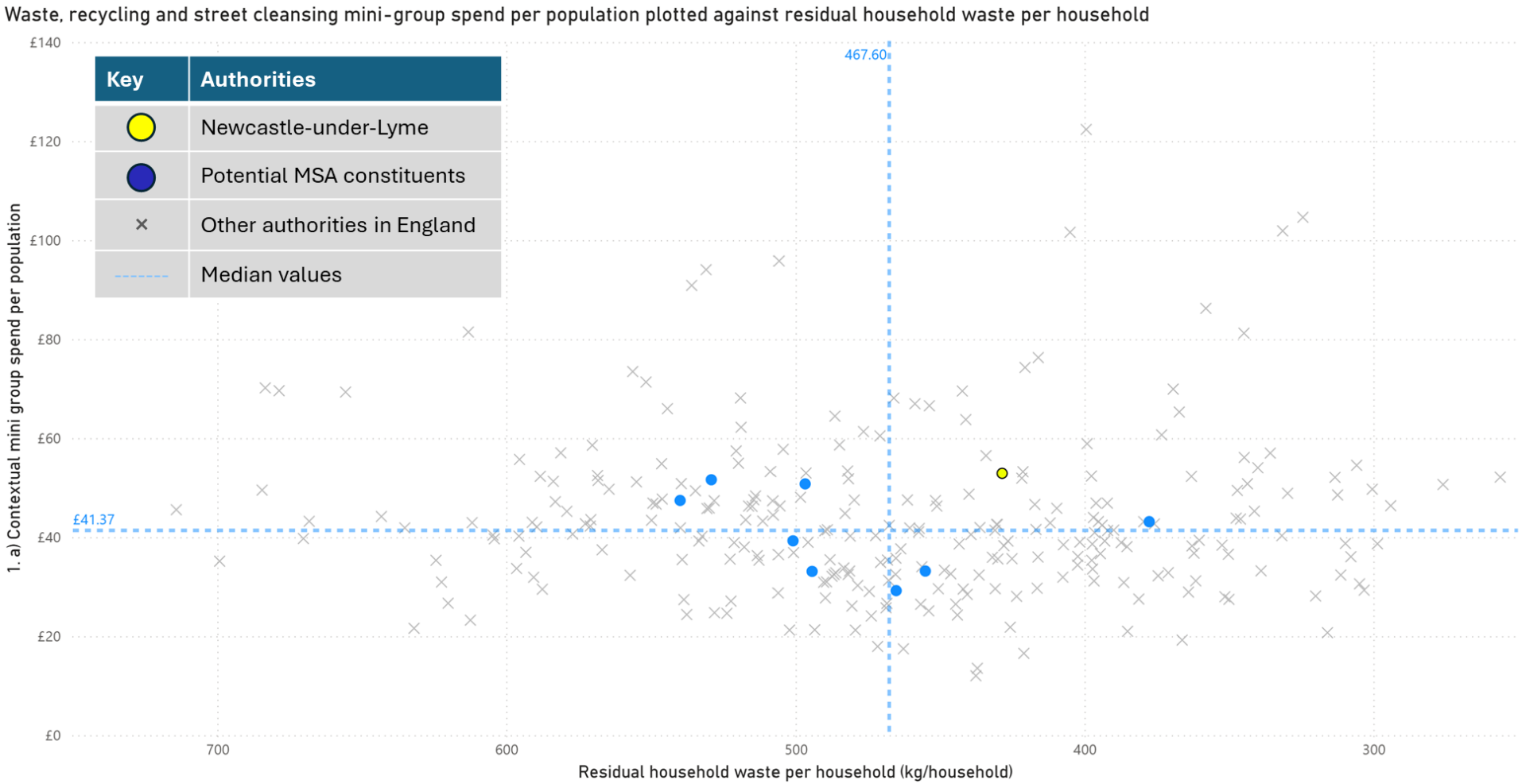


Housing benefits and welfare mini group net expenditure per capita (across for shire district, unitary, metropolitan borough and London borough authorities) plotted against *time taken to process housing benefit new claims and change in circumstances – Annual (FY24/25)*

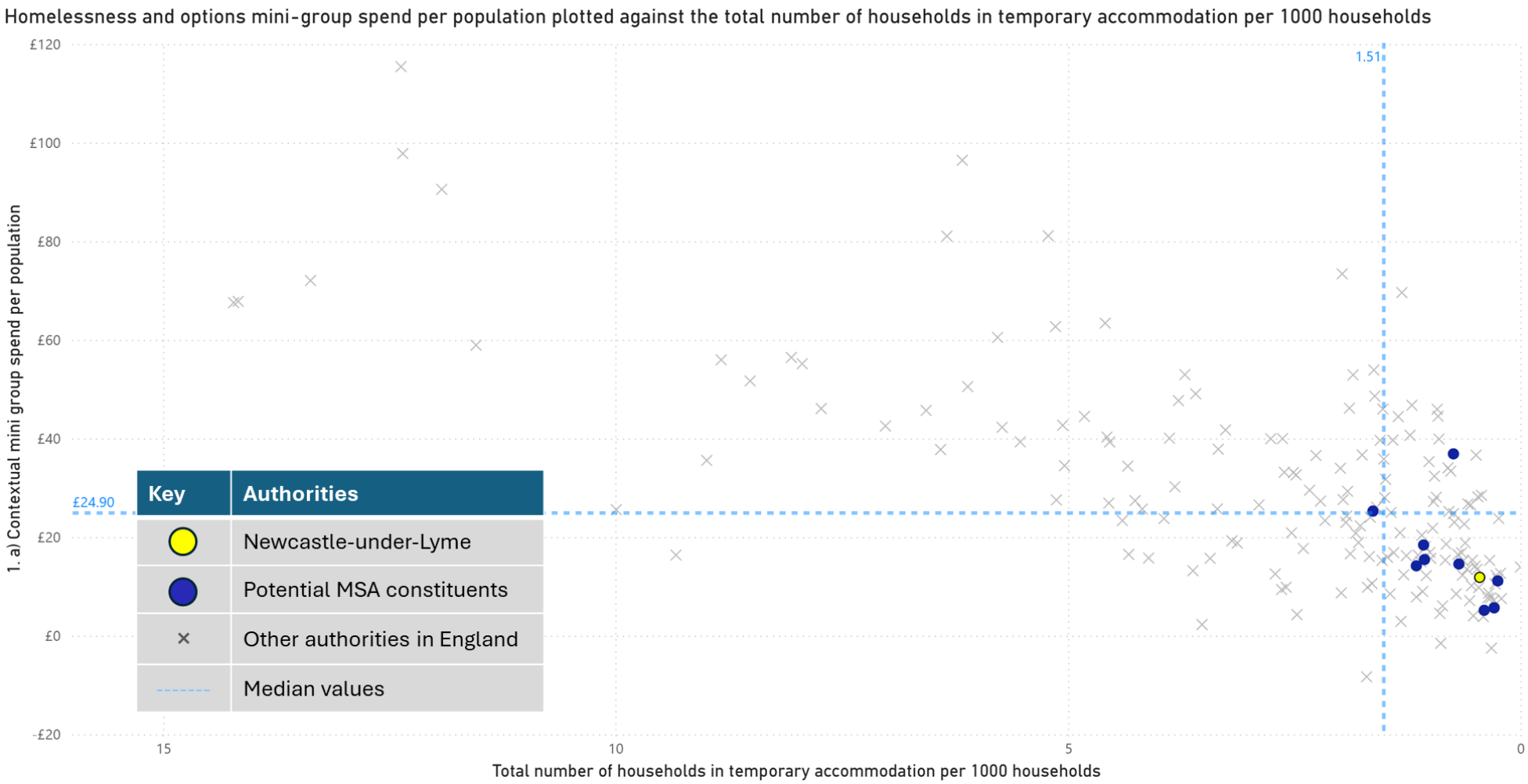


Revenues mini group net expenditure per capita (across for shire district, unitary, metropolitan borough and London borough authorities) plotted against a *composite of revenues performance (FY24/25).* This comprises two weighted metrics:

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

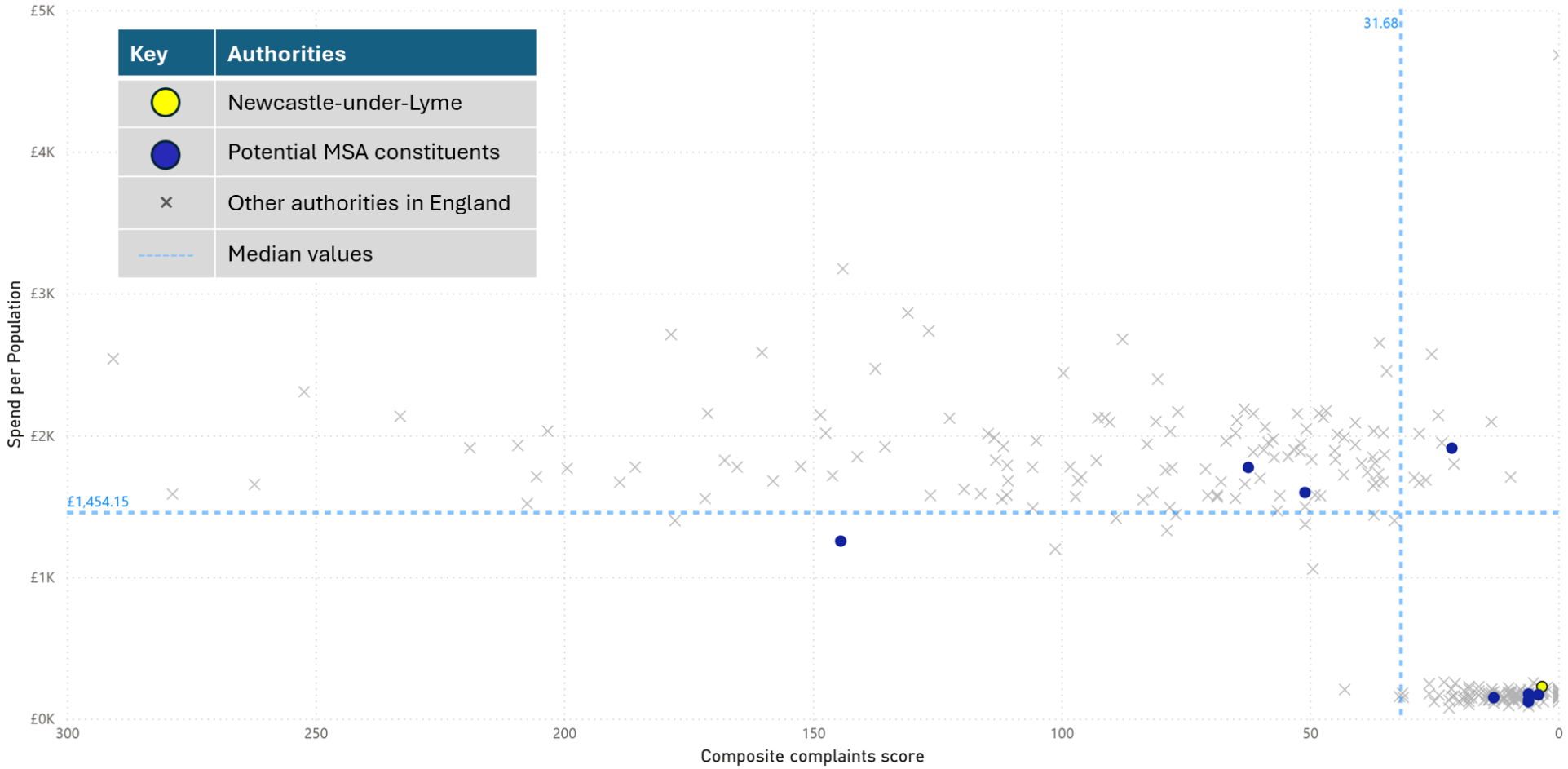


Waste, recycling and street cleansing mini group net expenditure per capita (across for shire district, unitary, metropolitan borough and London borough authorities) plotted against *residual household waste per household (kg/household) (FY23/24)*. Note that waste disposal costs are excluded to enable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



Homelessness and options mini group 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 2025[32]
    - Stoke-on-Trent City Council, which is predicting £13.7M overspend in the financial year as of 19th August 2025[33]
- 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

		Option 1		Option 2		Option 3		Option 4		Option 5	
Cost group	**Cost sub-group**	**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

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.

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.	

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.

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.

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.

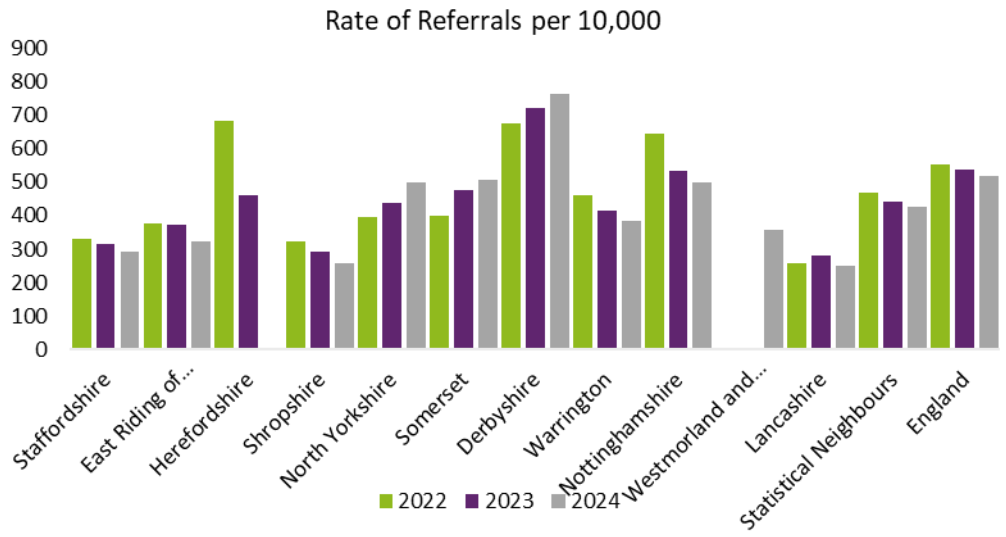
Appendix 4 NuL Survey ANalysis.pdf

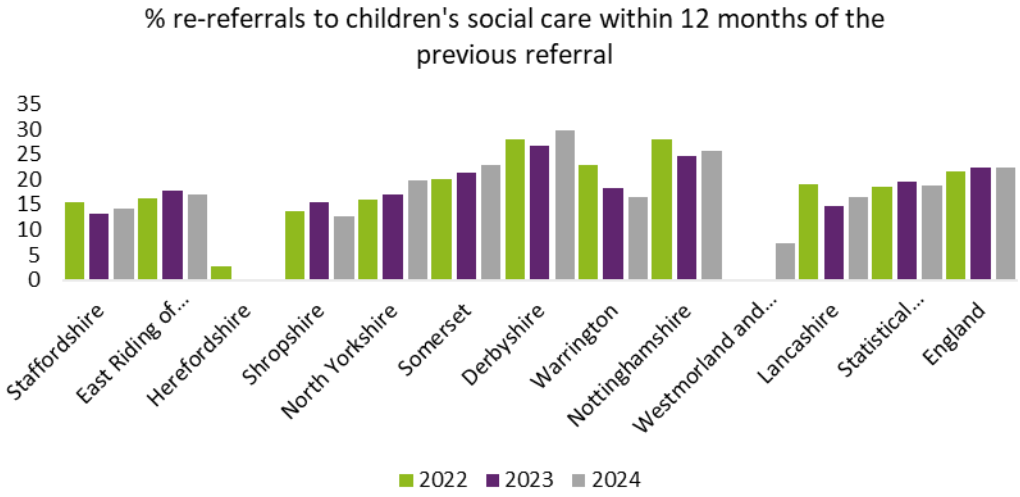
Appendix 5: education, children's social care and adult social care analysis

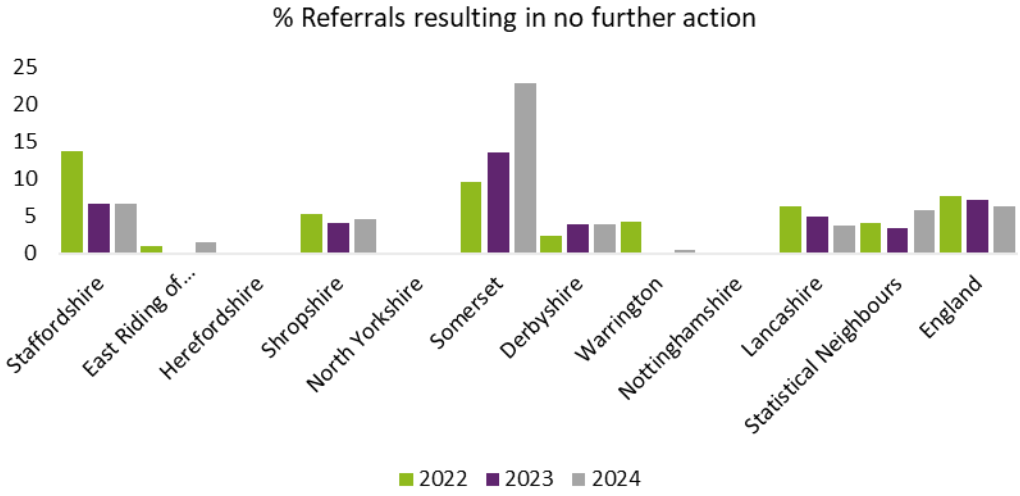
Children's social care

Children's social care – Staffordshire

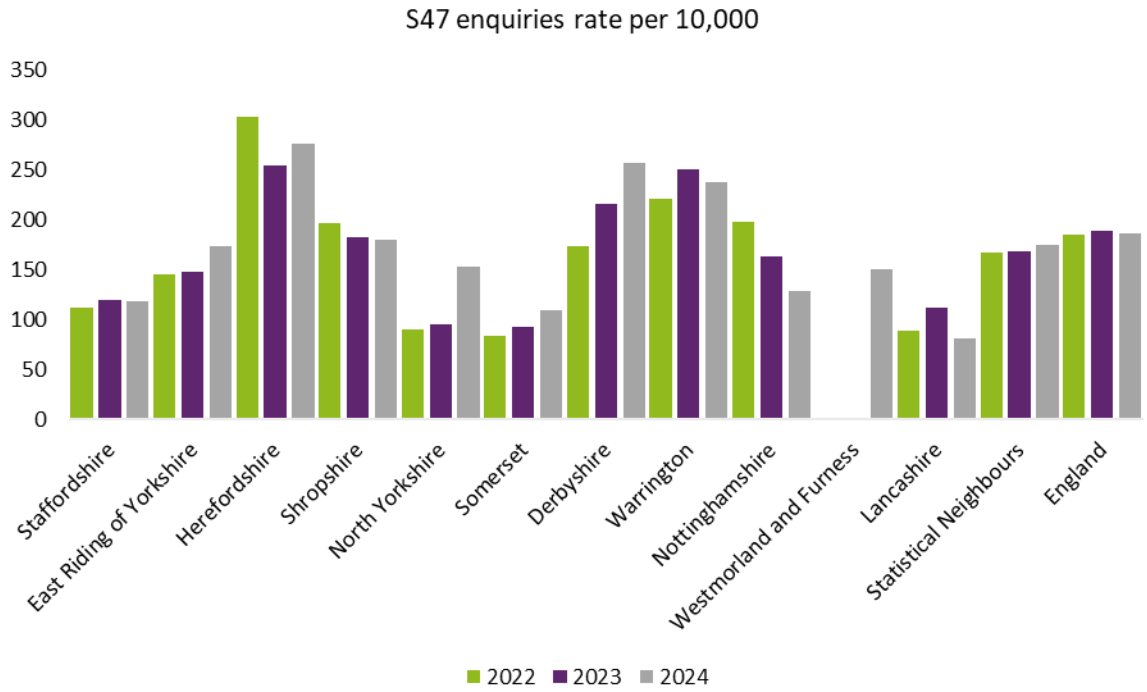
Referrals – rate per 10,000, re-referrals and no further action

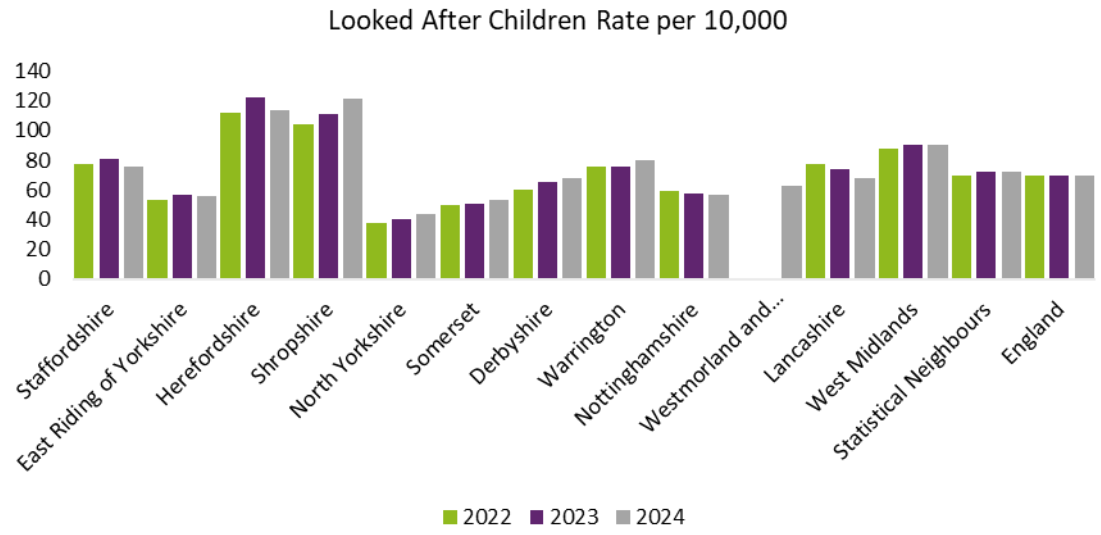




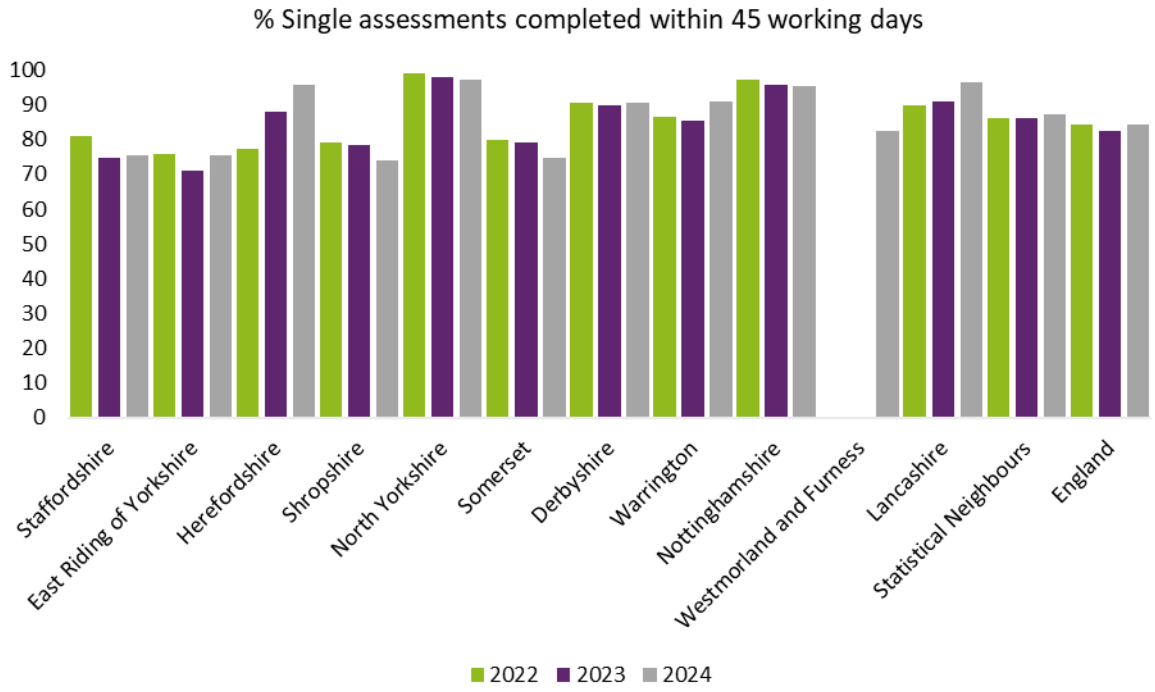


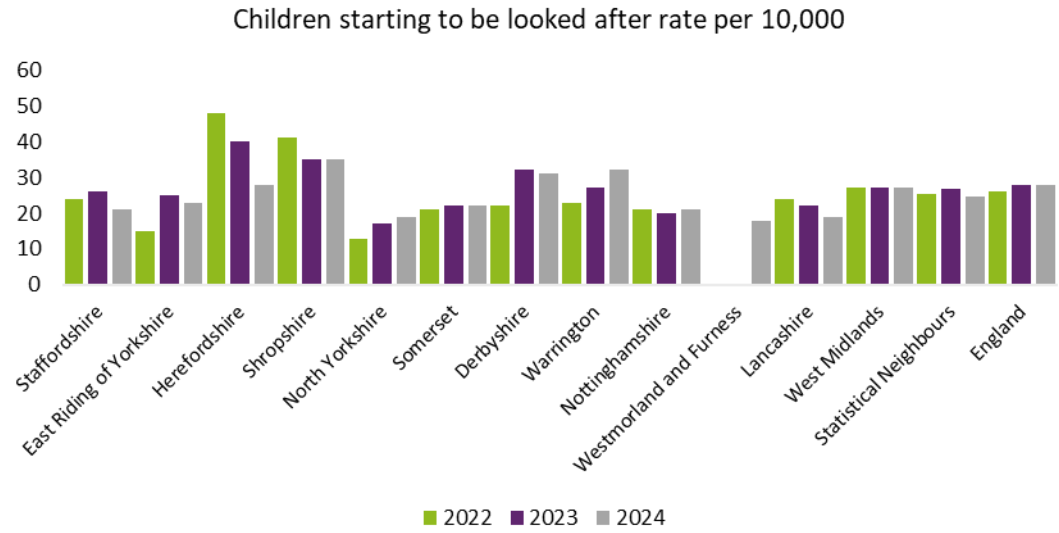
Children in Need and Child Protection

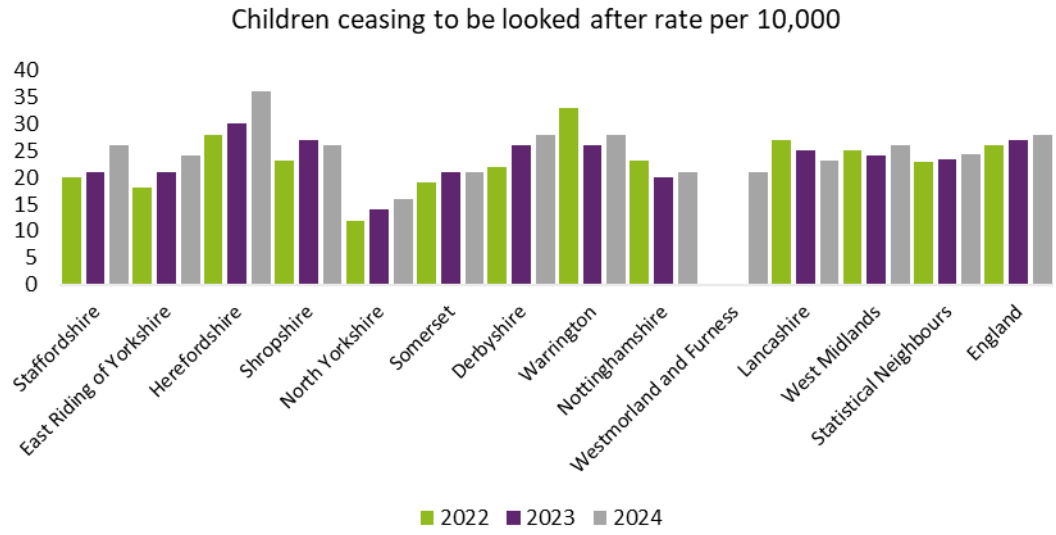




Looked after children

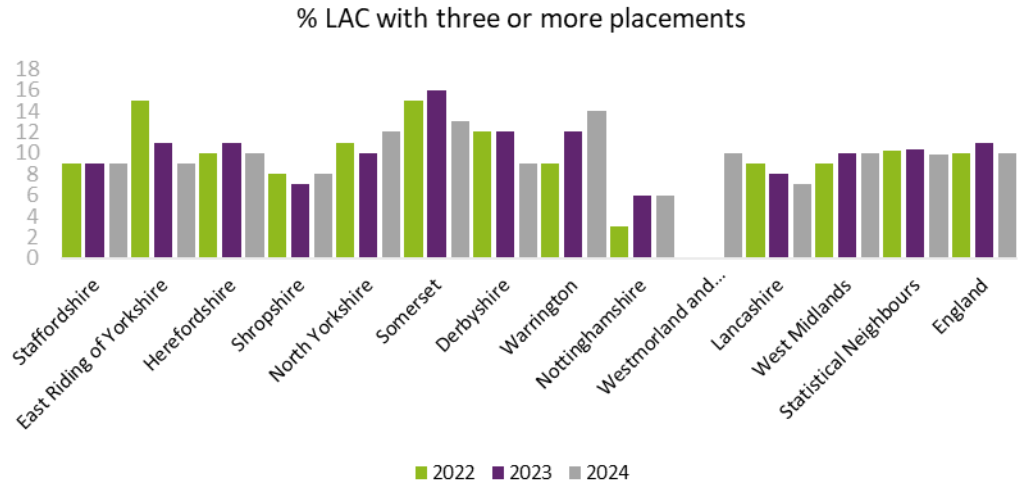

% Single assessments completed within 45 working days
100
90
80
70
60
50
40
30
20
10
0
Staffordshire
East Riding of Yorkshire
Herefordshire
Shropshire
North Yorkshire
Somerset
Derbyshire
Warrington
Nottinghamshire
Westmorland and Furness
Lancashire
Statistical Neighbours
England
2022
2023
2024

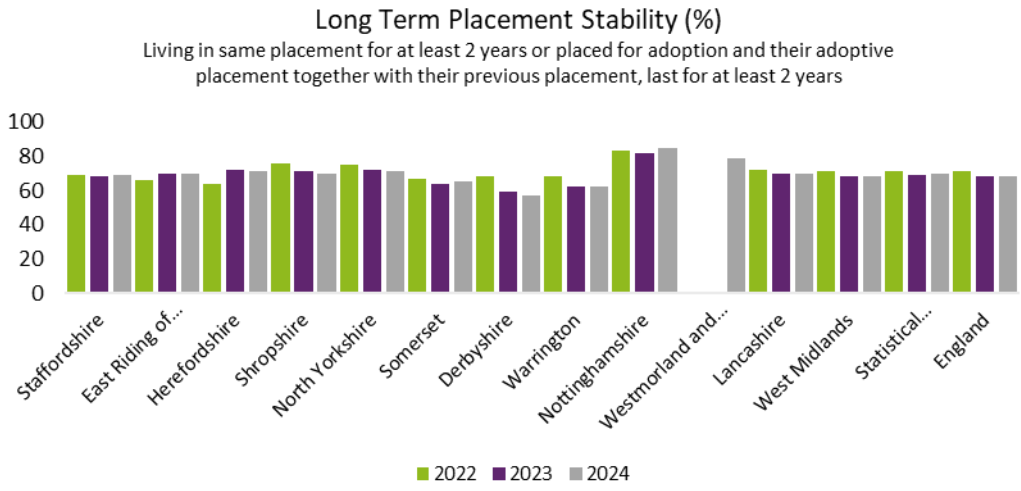

Children starting to be looked after rate per 10,000
60
50
40
30
20
10
0
Staffordshire
East Riding of Yorkshire
Herefordshire
Shropshire
North Yorkshire
Somerset
Derbyshire
Warrington
Nottinghamshire
Westmorland and Furness
Lancashire
West Midlands
Statistical Neighbours
England
2022
2023
2024

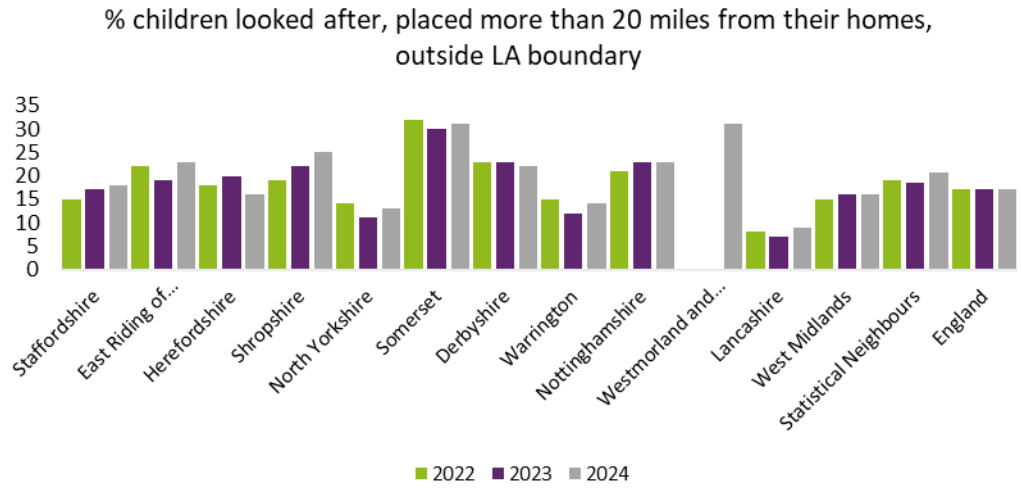


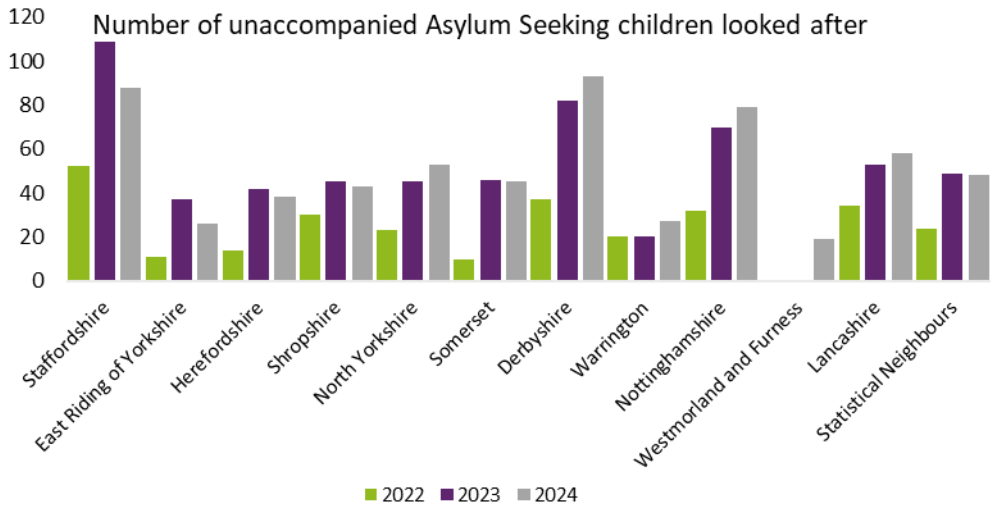
- LAC is slightly above SNs, but has been pretty stable over the last 3 years
- The number of children starting to be looked after fell and the number ceasing to be looked after saw an increase in 2024. This net reduction will reduce some of the budgetary pressure in this area

Looked After Children – placements

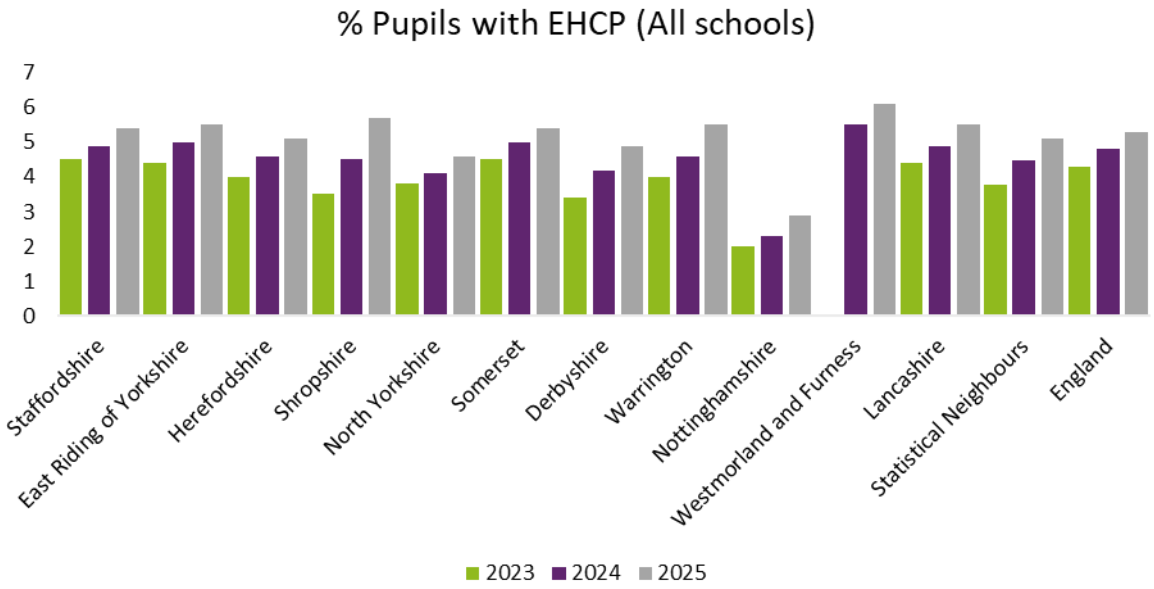


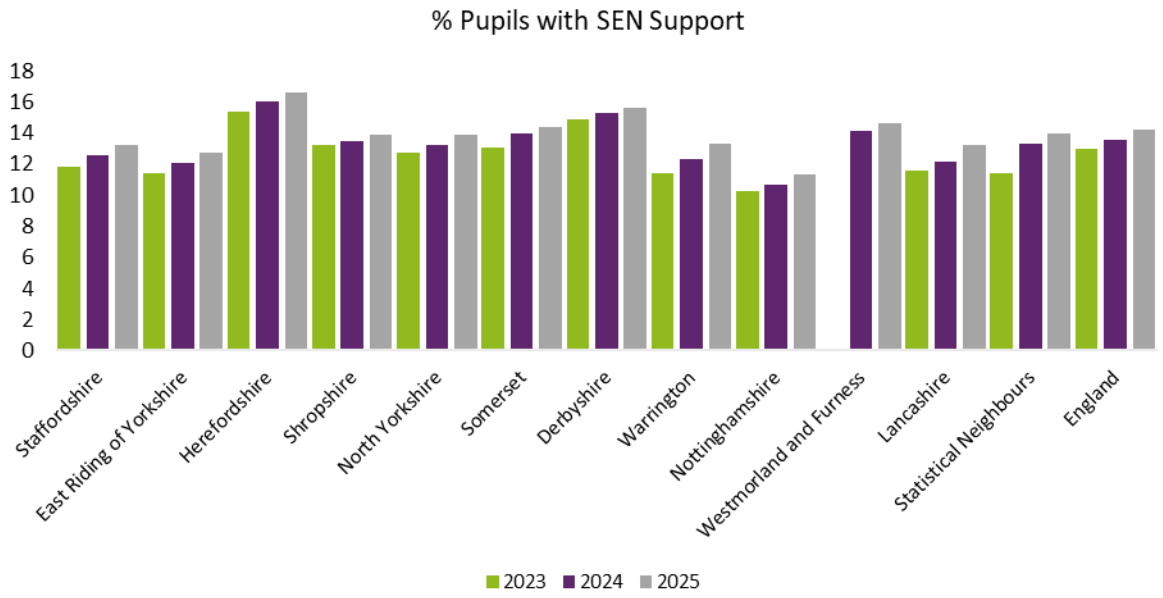






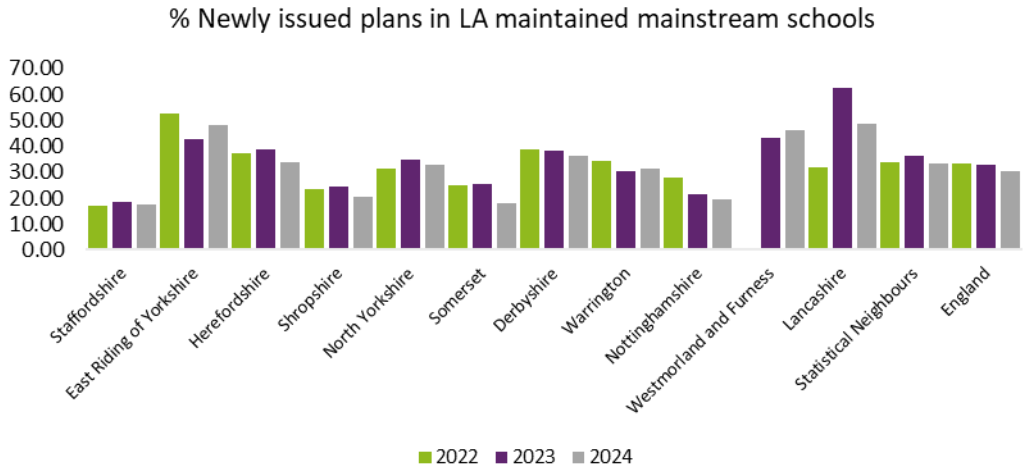
SEND EHCP and SEN support

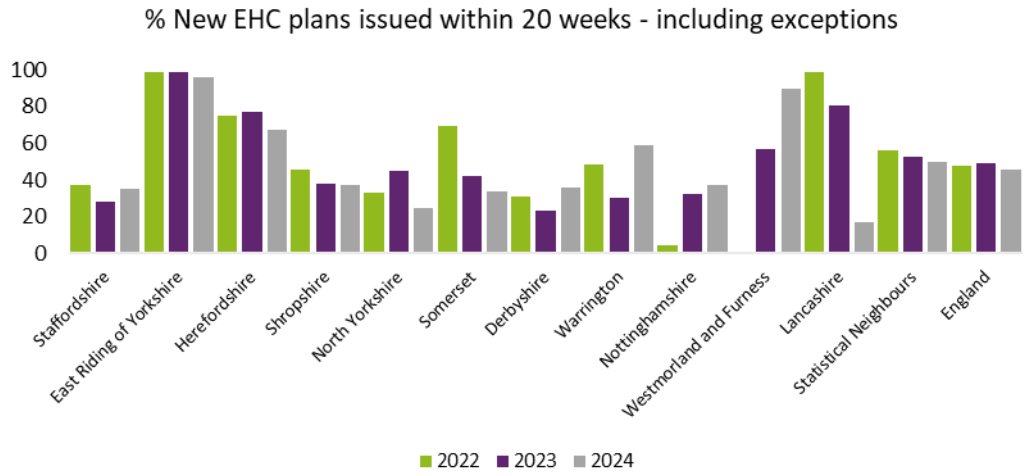


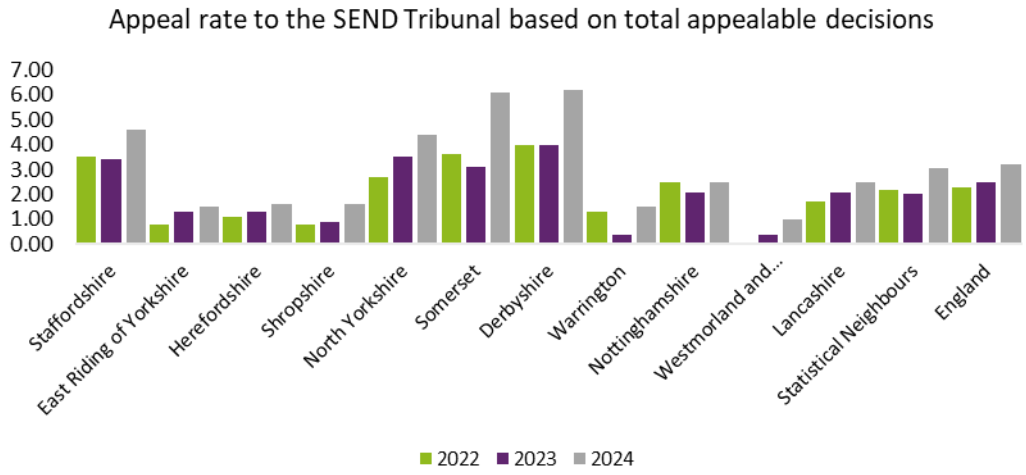


- % of pupils with an EHCP and % pupils in receipt of SEN Support, whilst increasing in line with the national picture are in line with statistical neighbours

SEND – EHCPs and SEN Tribunals

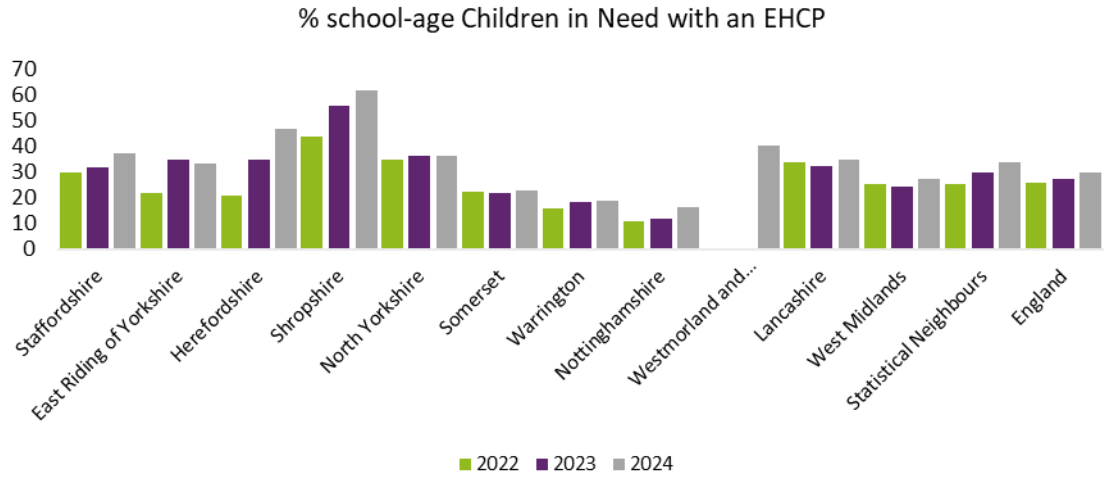


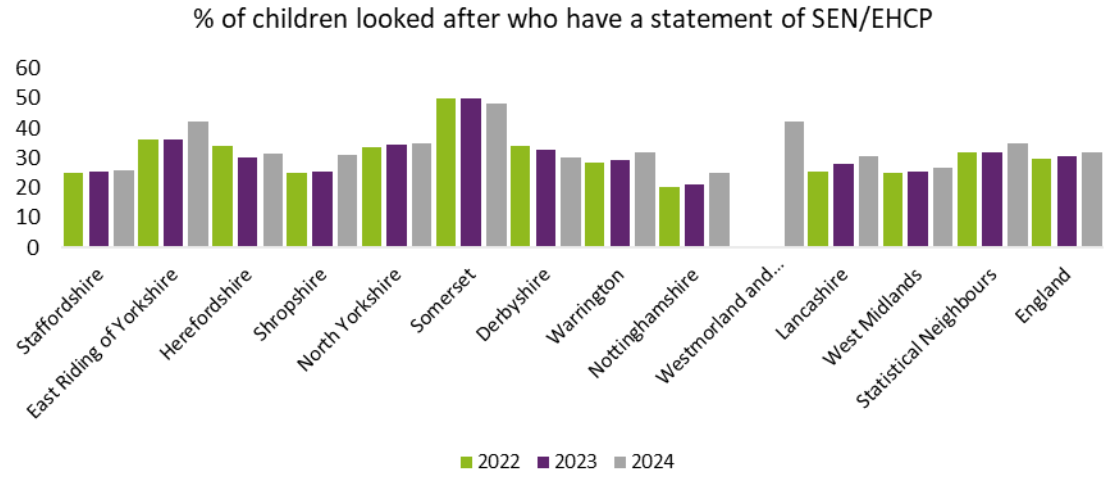


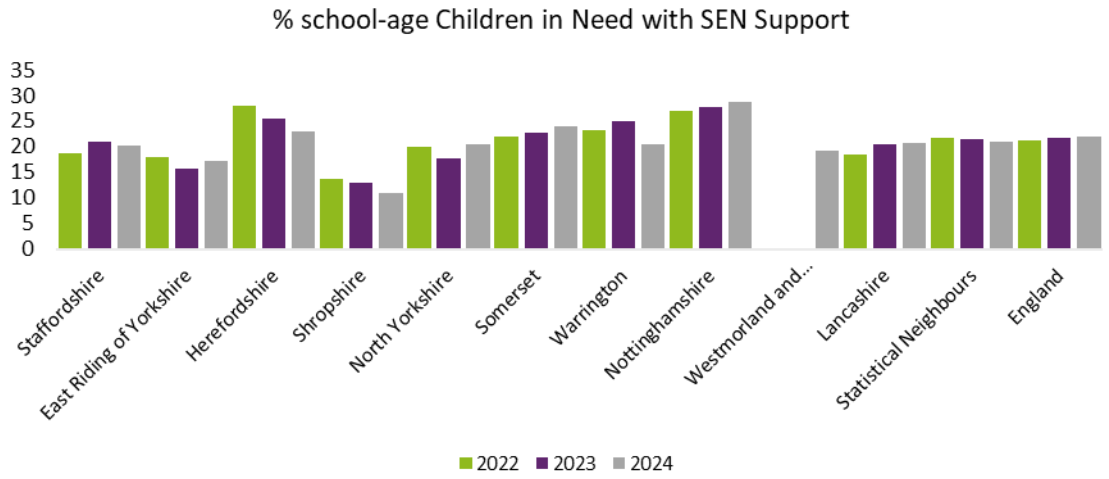


- Number of plans issued in LA maintained schools is low which would indicate a higher dependency on special schools
- Also low % of EHC plans issued within 20 weeks
- Appeal rate is high 4.6 versus 3.05%

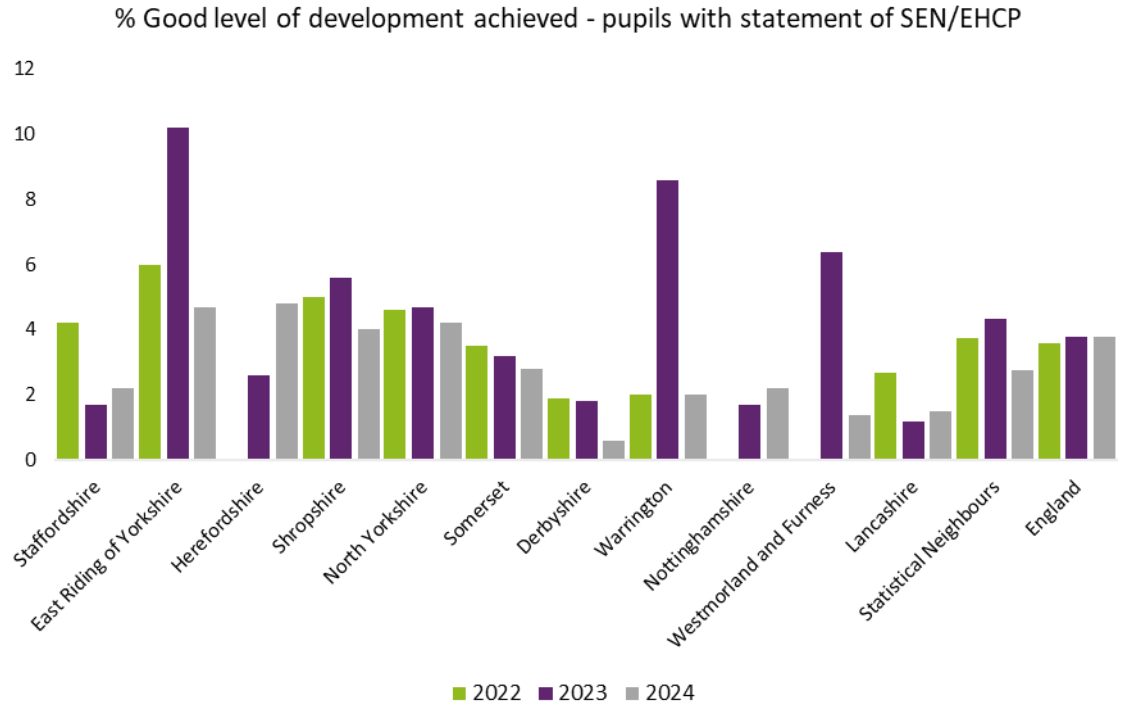
SEND – EHCPs and SEN support – CiN and LAC



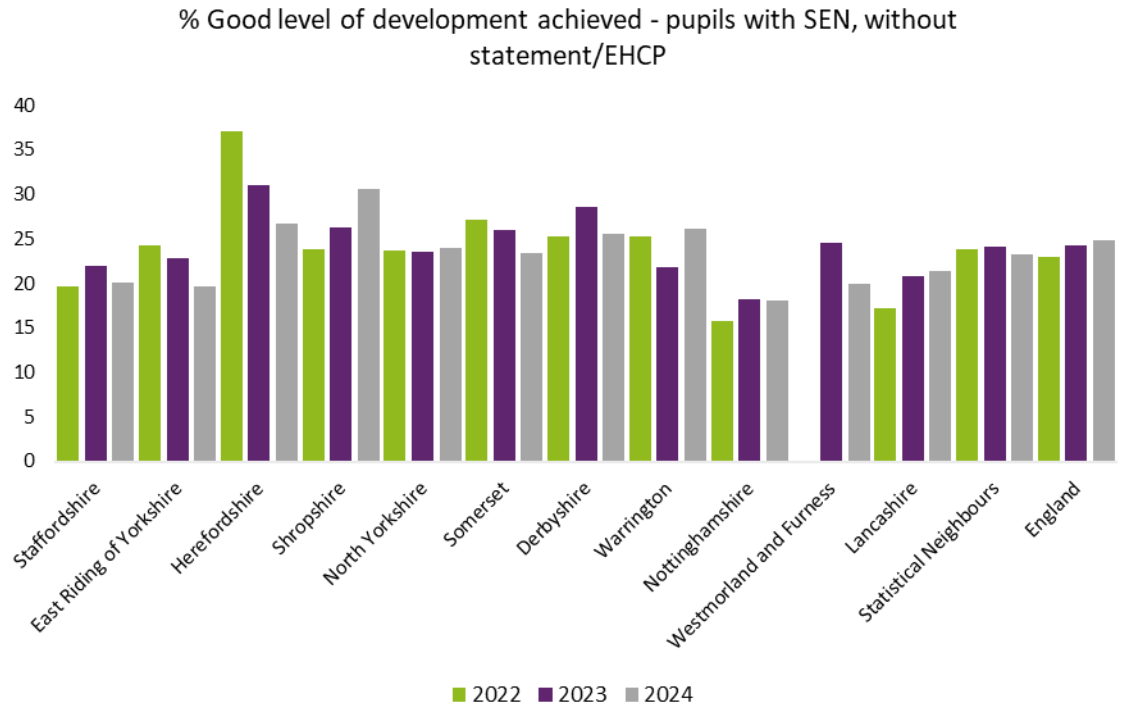




Foundation stages

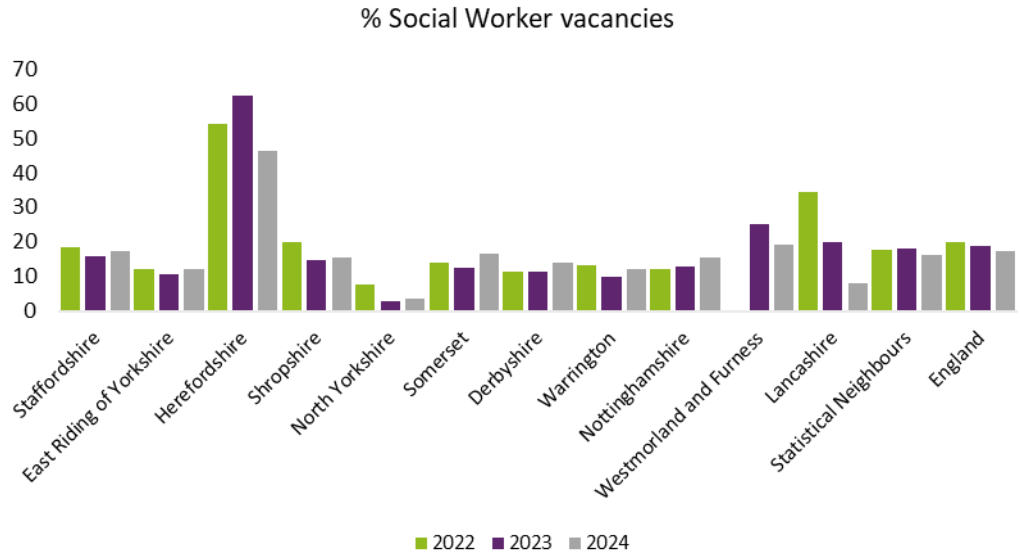


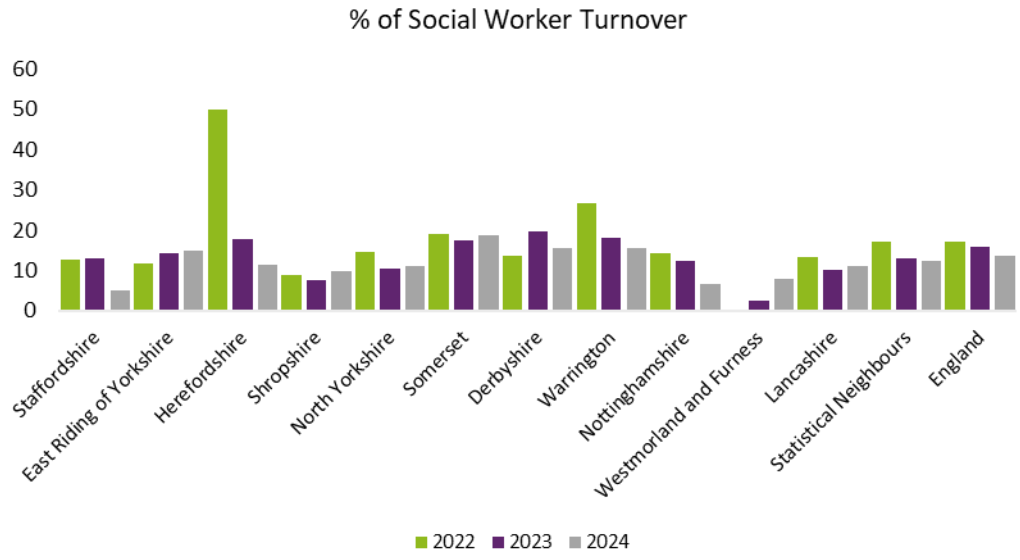
Note: 2020 and 2021 data missing so 2019 retained for comparison

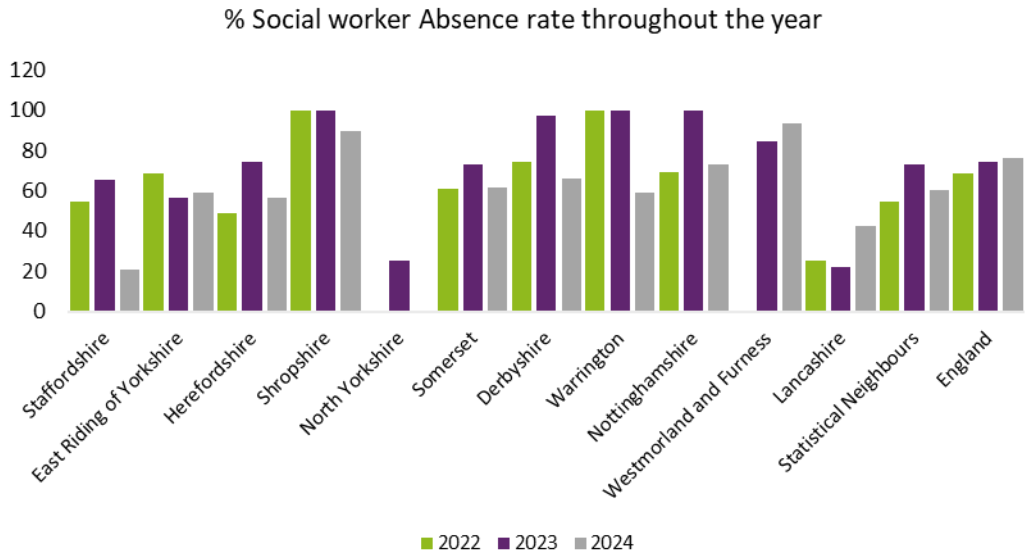


- Above indicates a lower level of development for pupils with SEN than Staffordshire SNs.

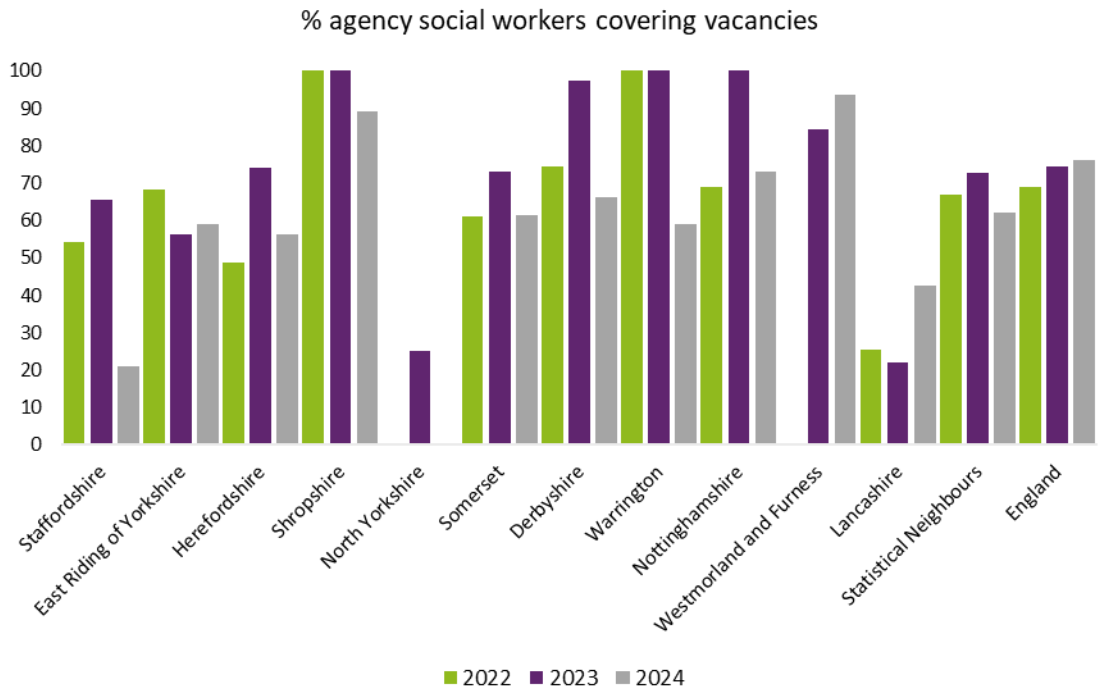
Children's Workforce part 1



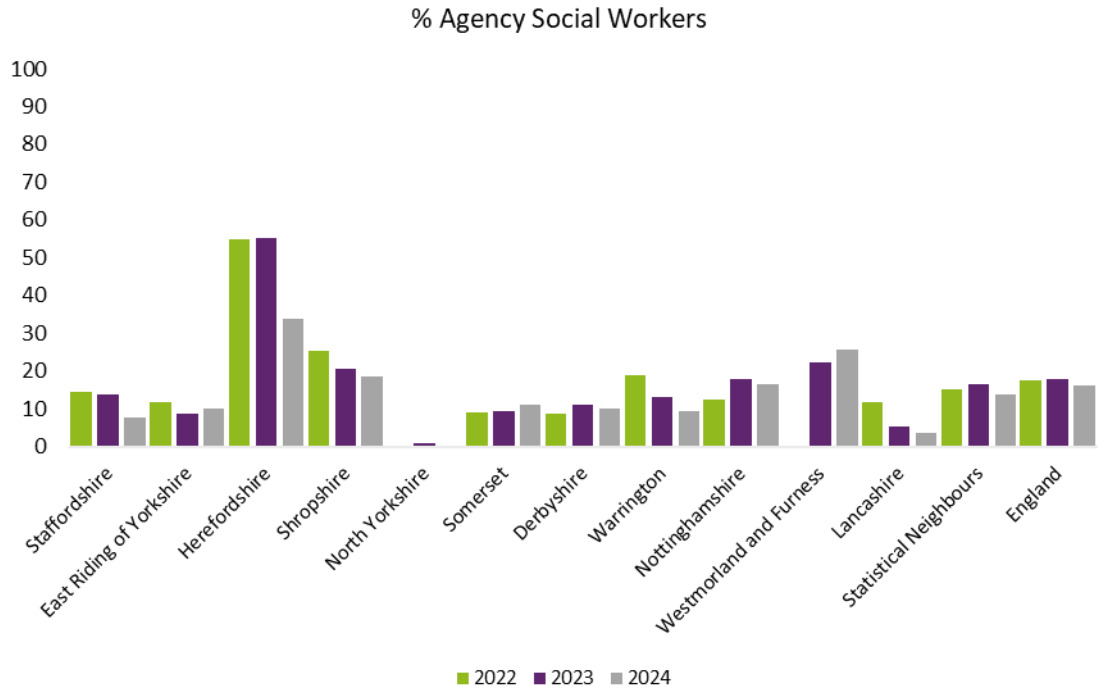




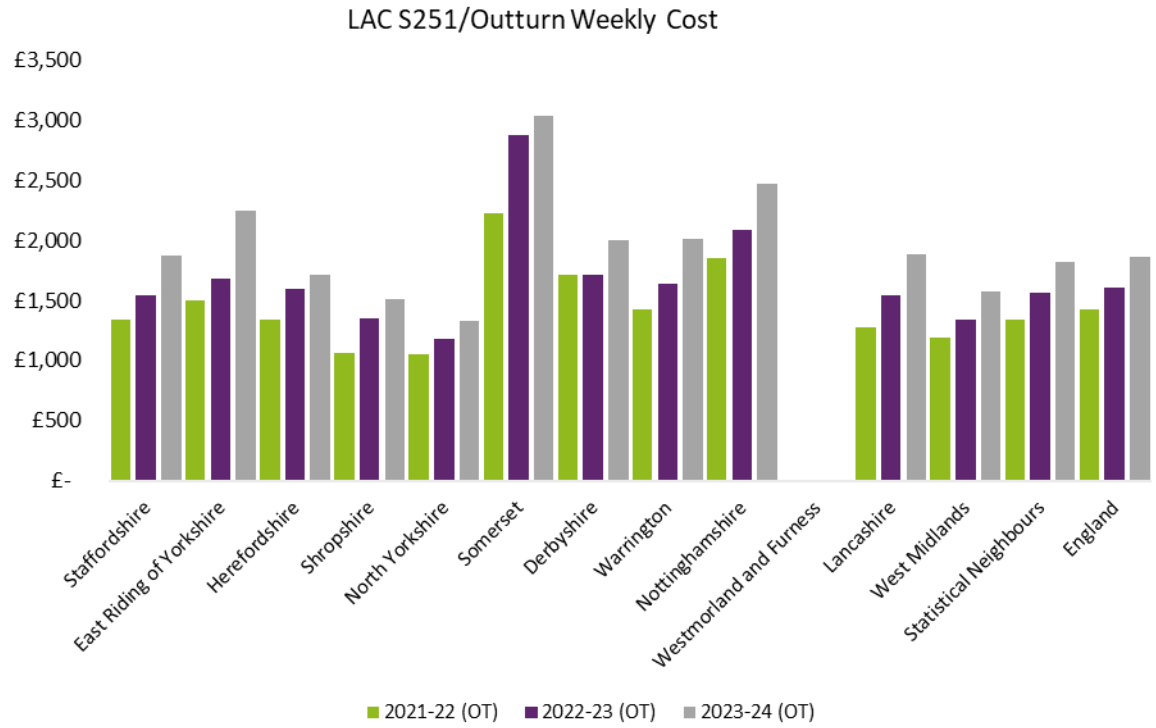
Children's Workforce part 2

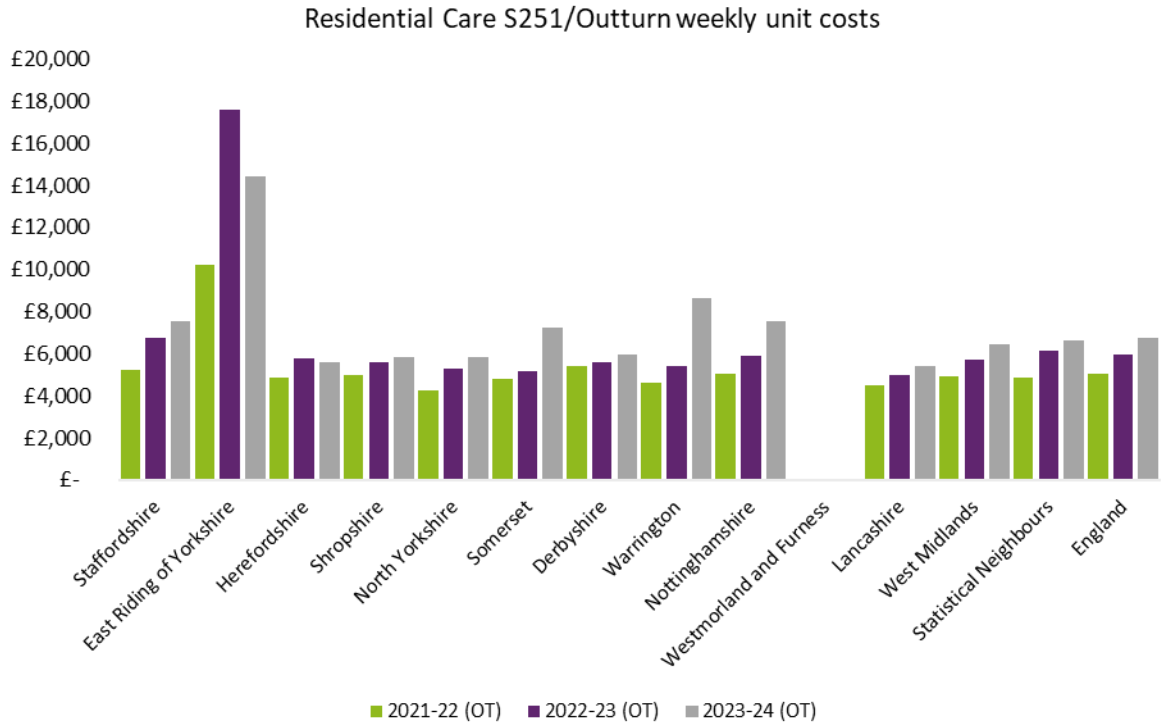


Note: % agency social workers covering vacancies - % above 100 are accurate reporting figures



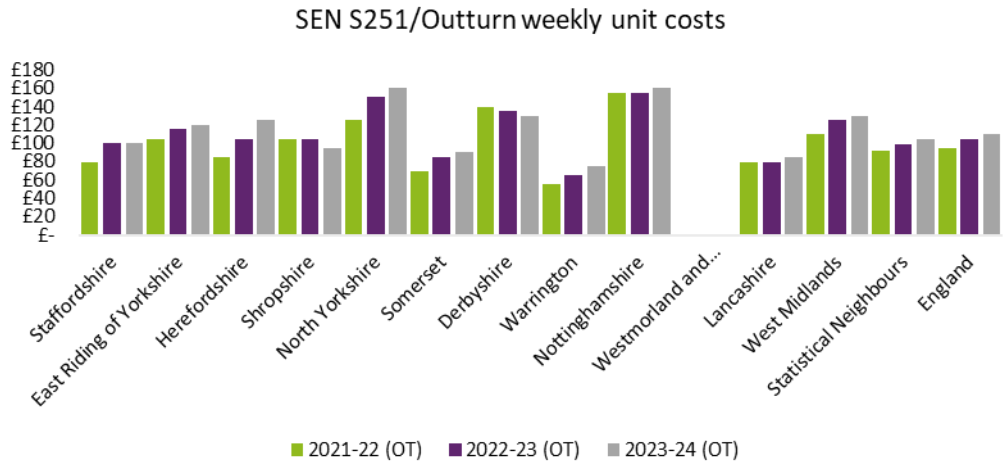
Finance – average weekly costs

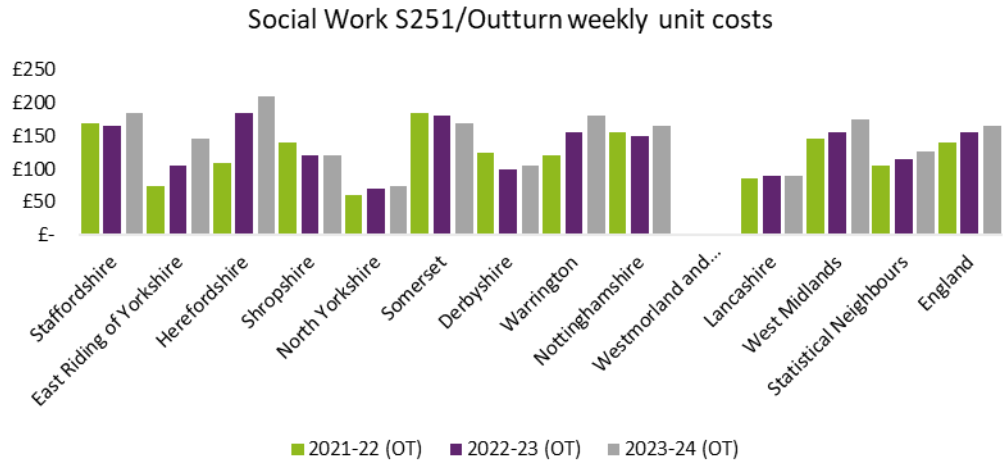


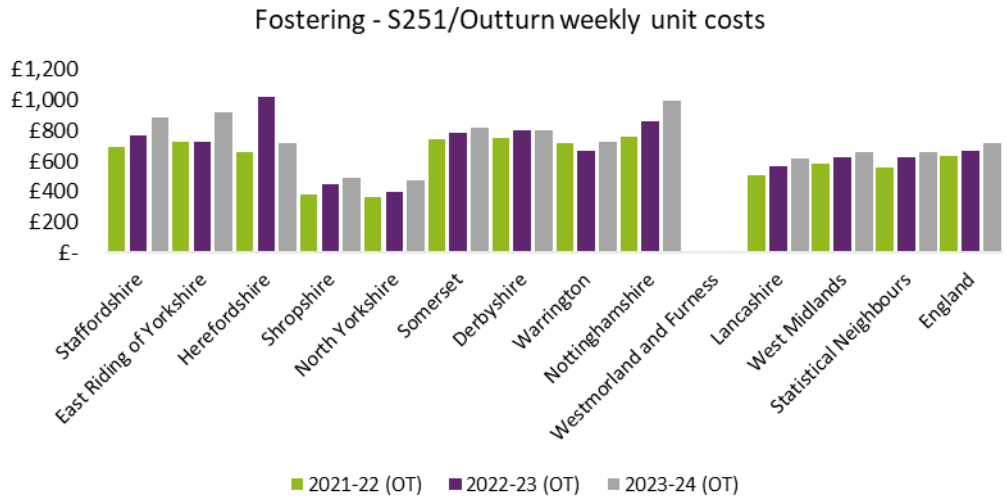


- Costs are in line with statistical neighbours for Looked After Children weekly unit costs and also residential care, although increasing and whilst in line with the national picture it will be creating additional budgetary pressures
- Note average LAC weekly unit cost for a unitary/ metropolitan authority in 23/24 with a population below 250k was £1759 per week

Finance – average weekly unit costs

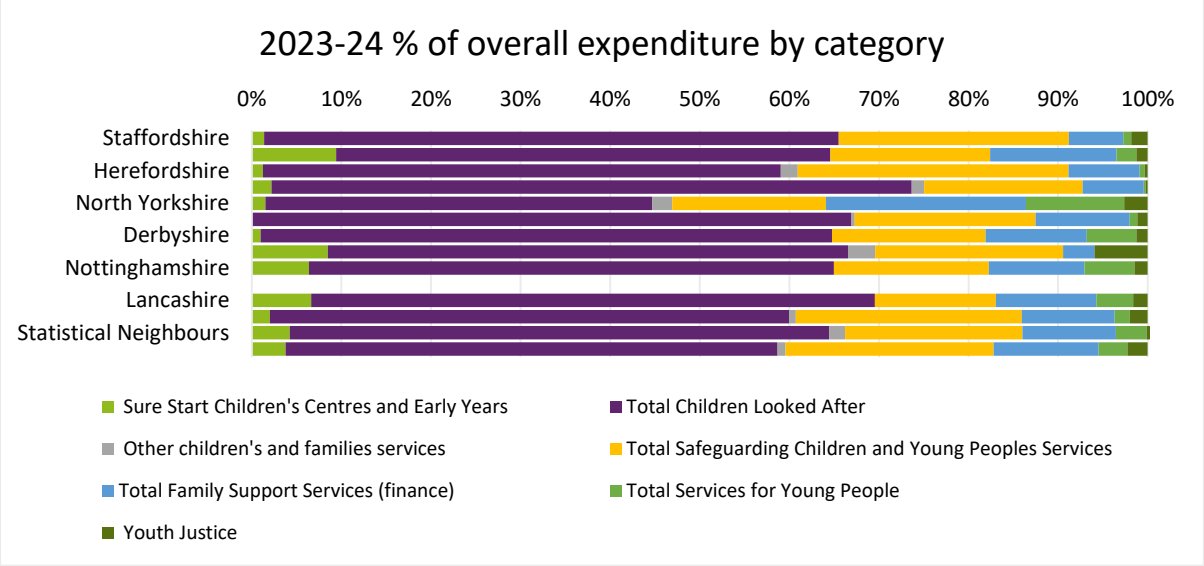




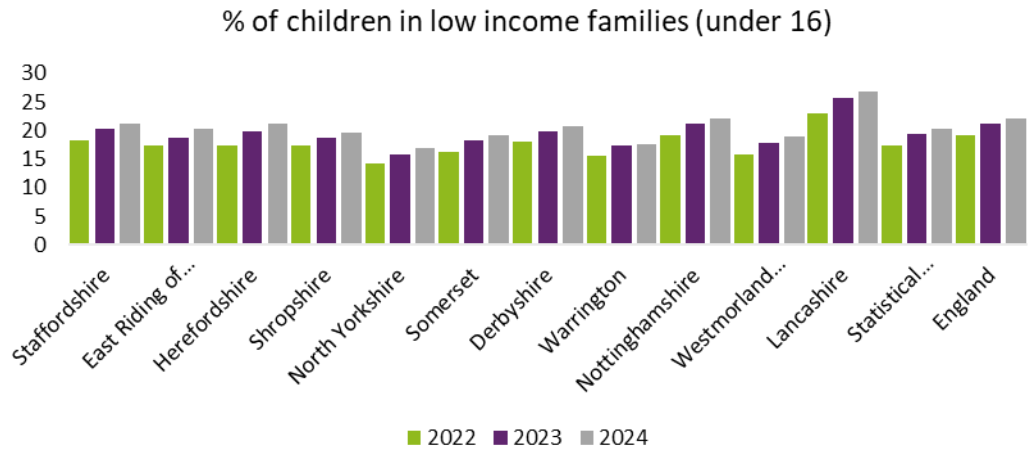


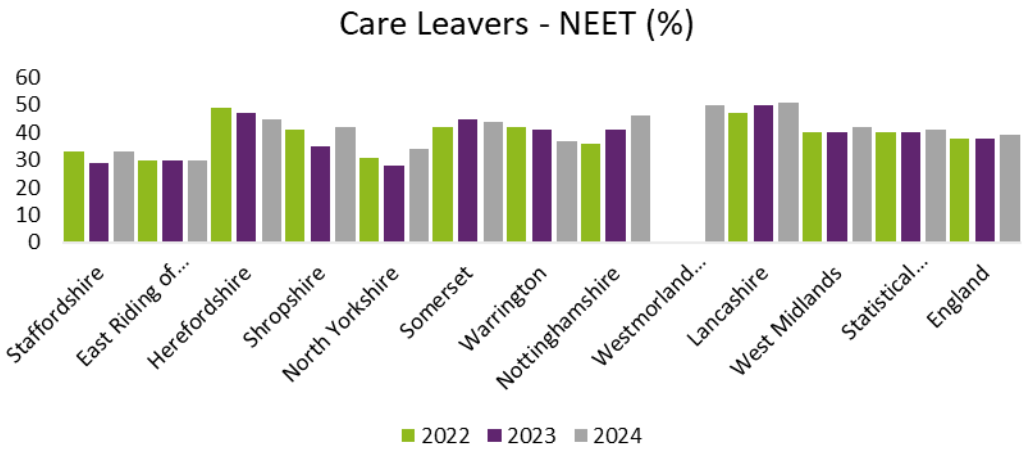
- SEN weekly outturn costs are in line with statistical neighbours at £100 per week compared to £104 statistical neighbour average
- Fostering weekly unit costs are higher at £890 versus £656 statistical neighbour average, this will also be impacted by the split of internal versus external foster carers, 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%

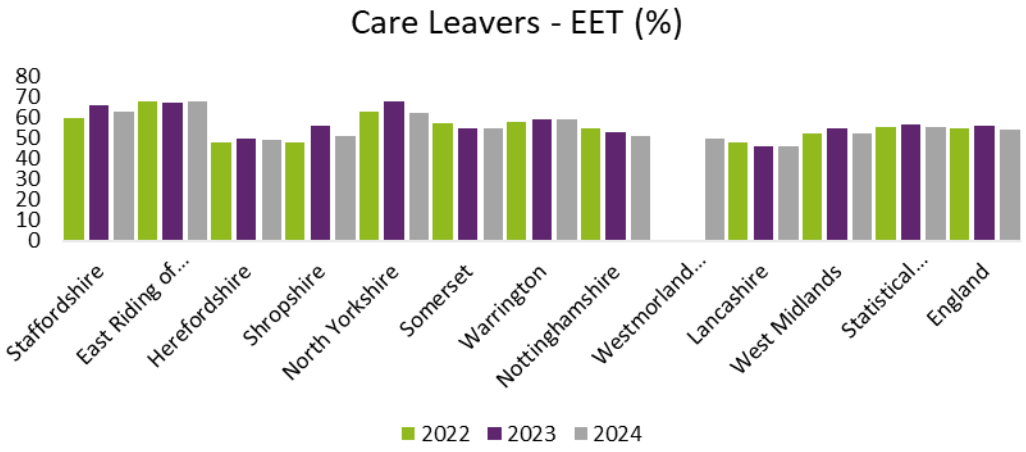
Finance – Budget and expenditure



Wider Context

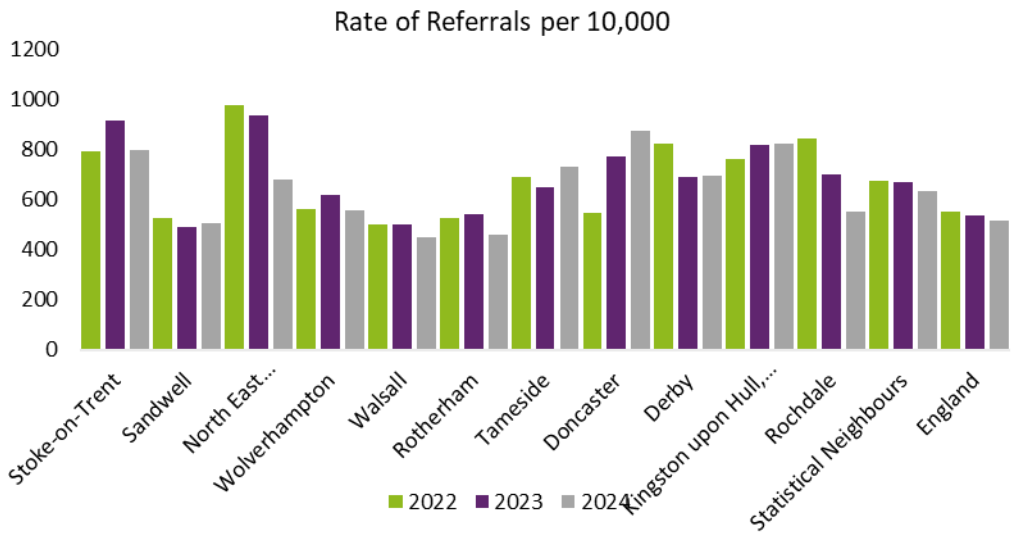


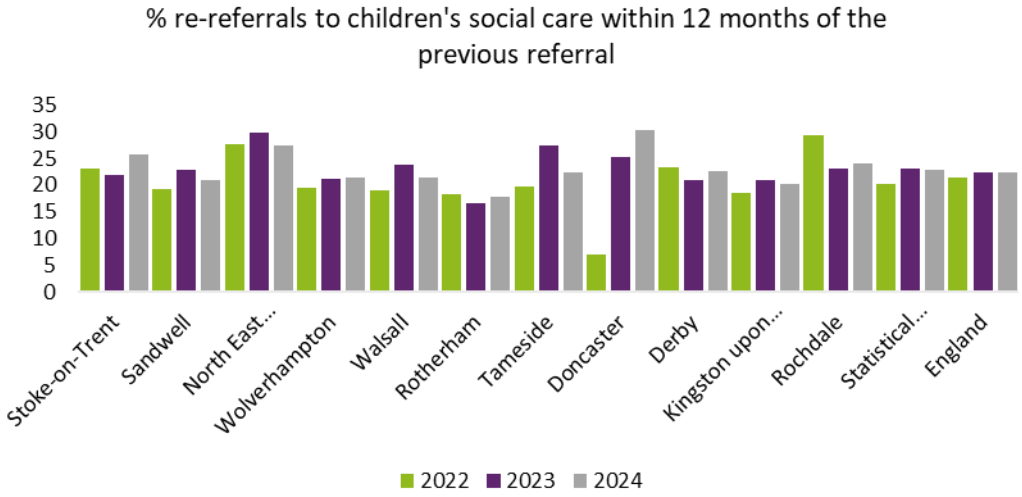

Care Leavers - NEET (%)
60
50
40
30
20
10
0
Staffordshire
East Riding of...
Herefordshire
Shropshire
North Yorkshire
Somerset
Warrington
Nottinghamshire
Westmorland...
Lancashire
West Midlands
Statistical...
England
2022
2023
2024

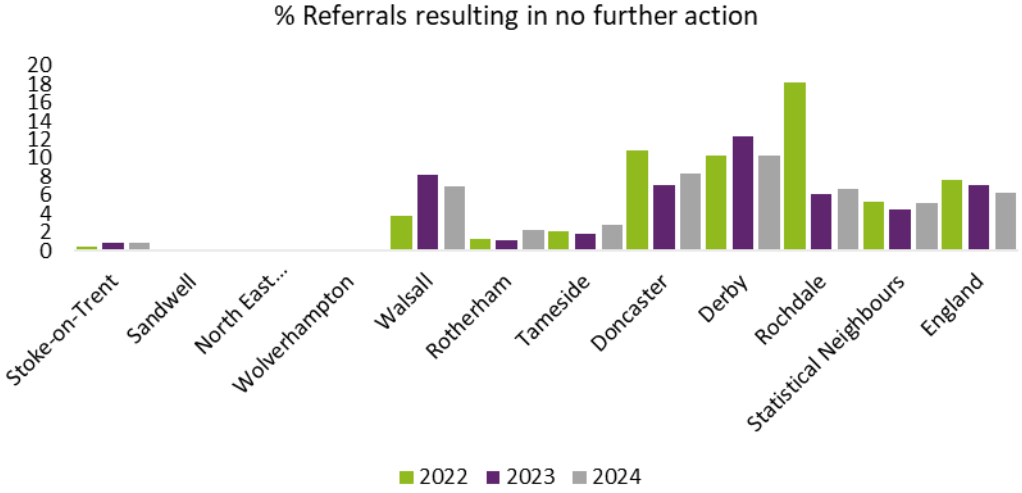

Care Leavers - EET (%)
80
70
60
50
40
30
20
10
0
Staffordshire
East Riding of...
Herefordshire
Shropshire
North Yorkshire
Somerset
Warrington
Nottinghamshire
Westmorland...
Lancashire
West Midlands
Statistical...
England
2022
2023
2024

Children's social care – Stoke-on-Trent

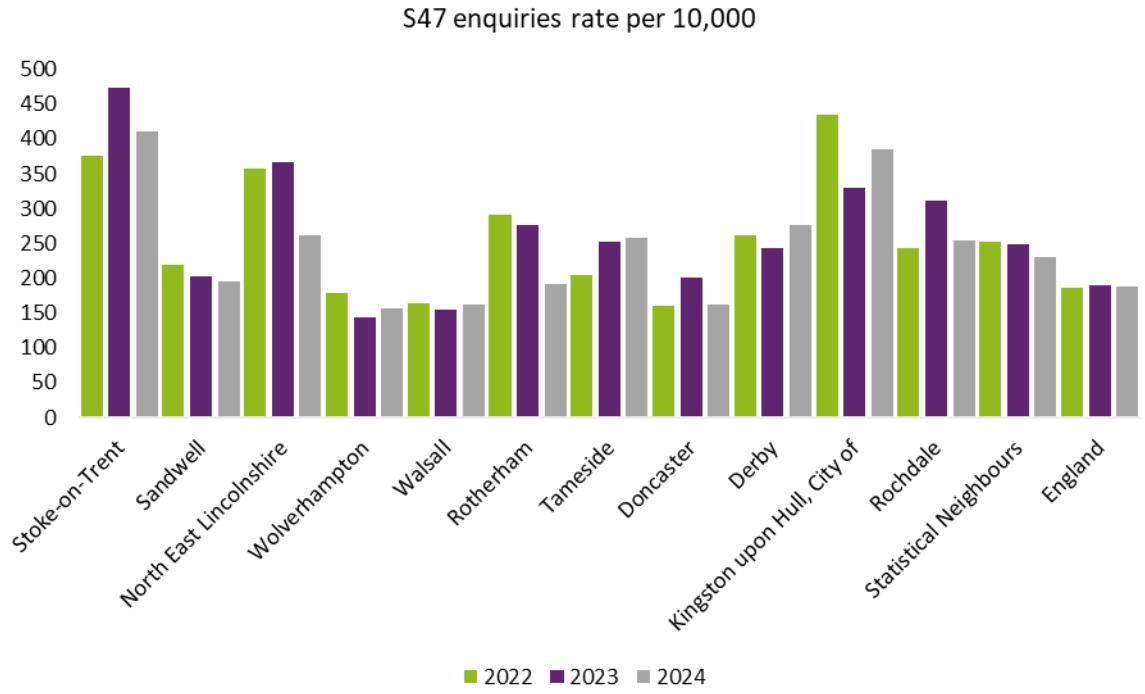
Referrals – rate per 10,000, re-referrals and no further action

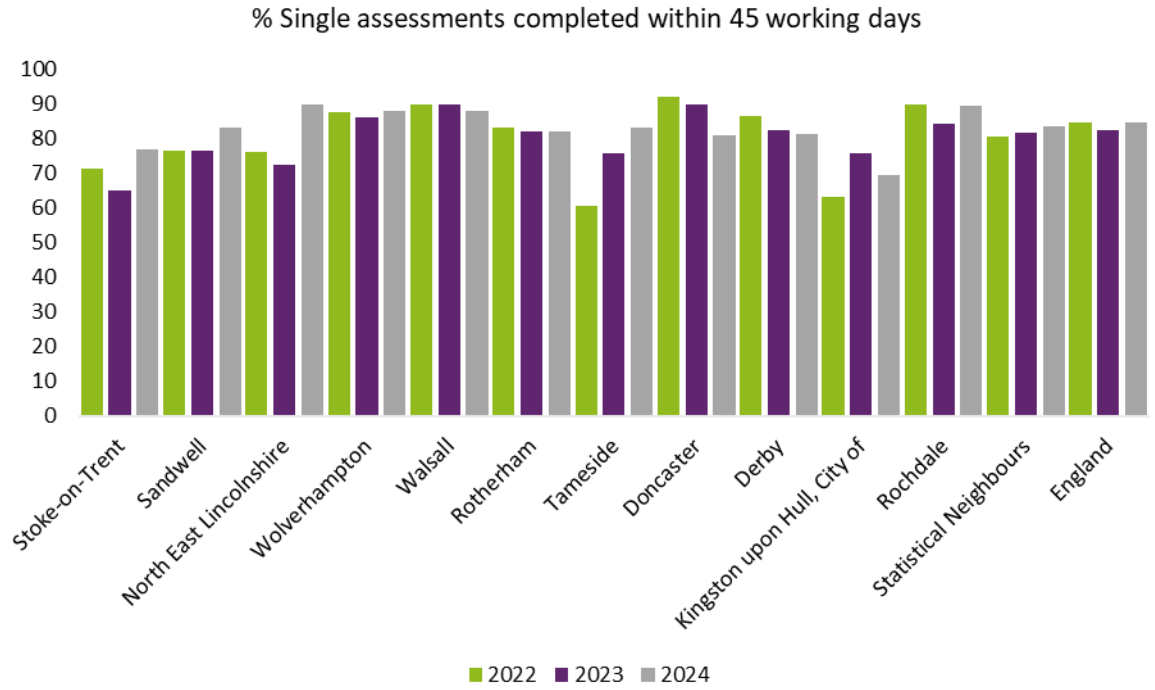




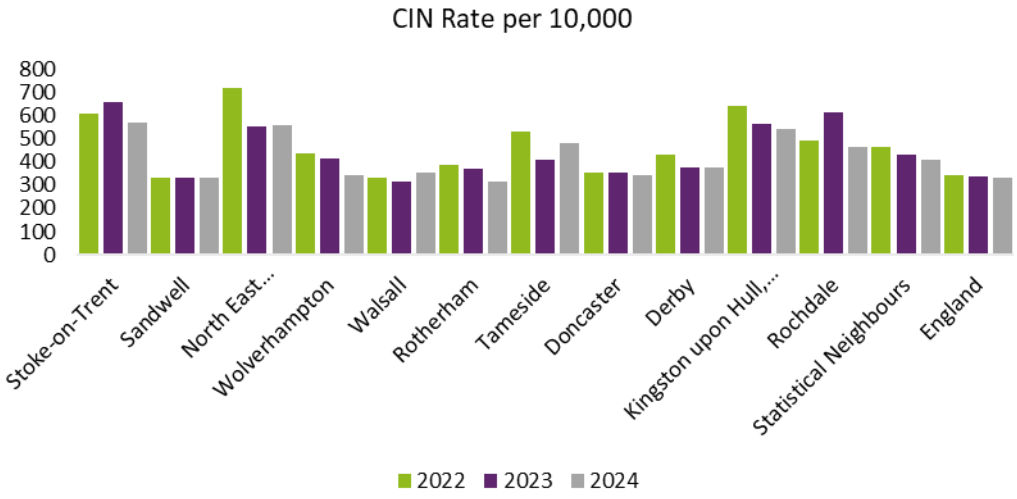


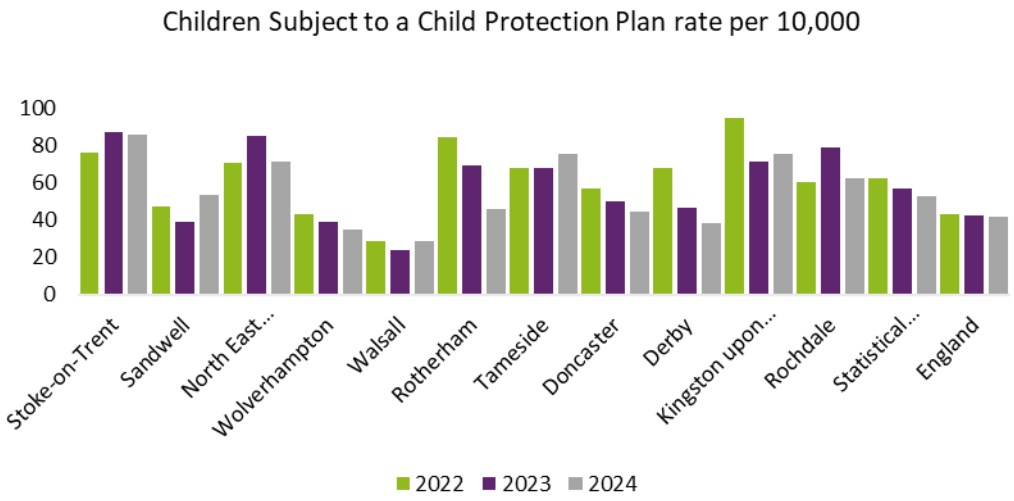
Children in Need and Child Protection

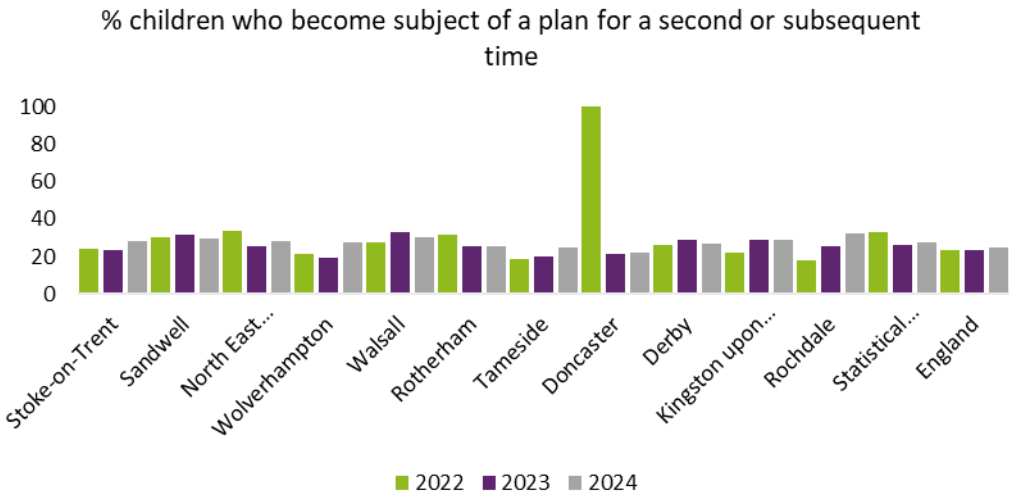




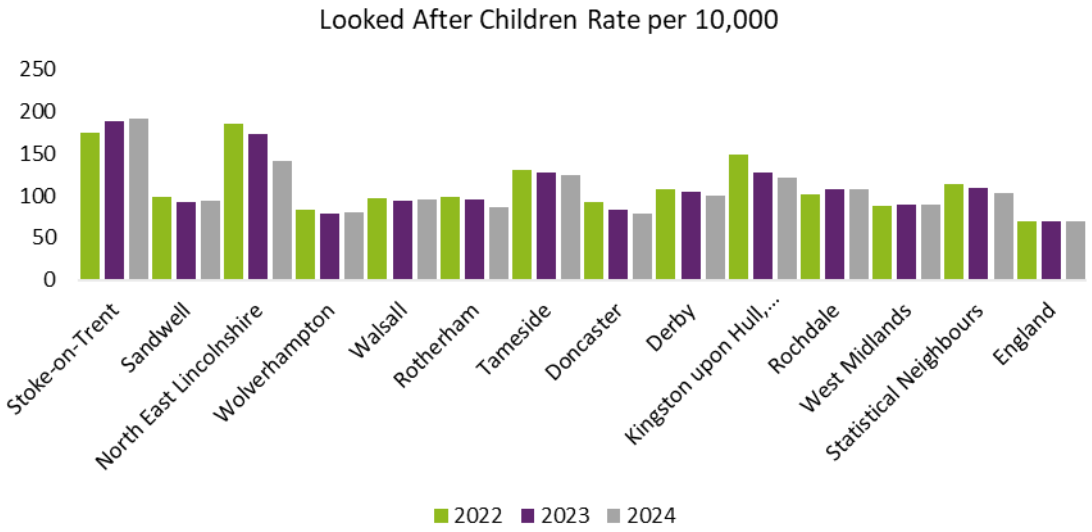
Children in Need and Child Protection

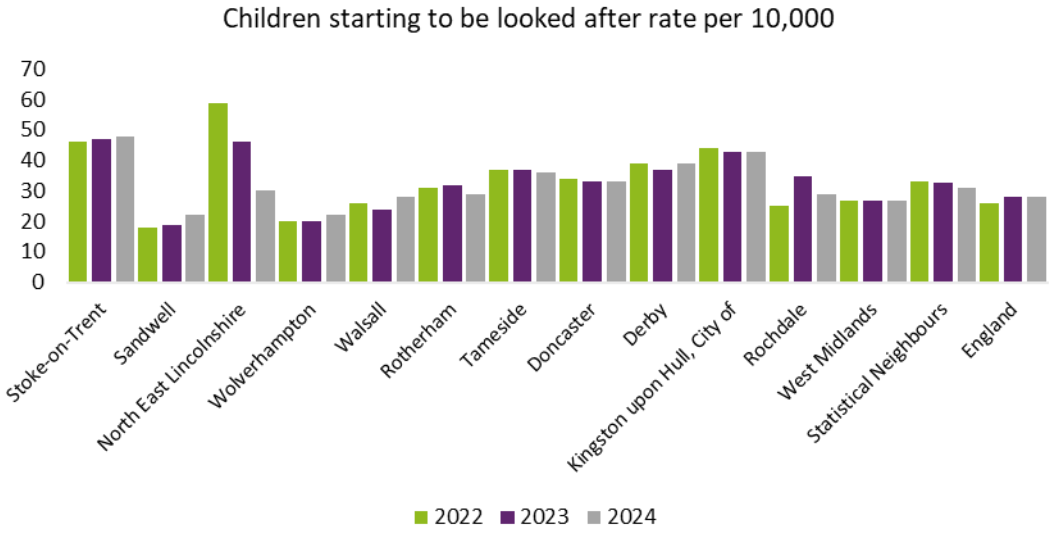

CIN Rate per 10,000
800
700
600
500
400
300
200
100
0
Stoke-on-Trent
Sandwell
North East...
Wolverhampton
Walsall
Rotherham
Tameside
Doncaster
Derby
Kingston upon Hull,...
Rochdale
Statistical Neighbours
England
2022
2023
2024

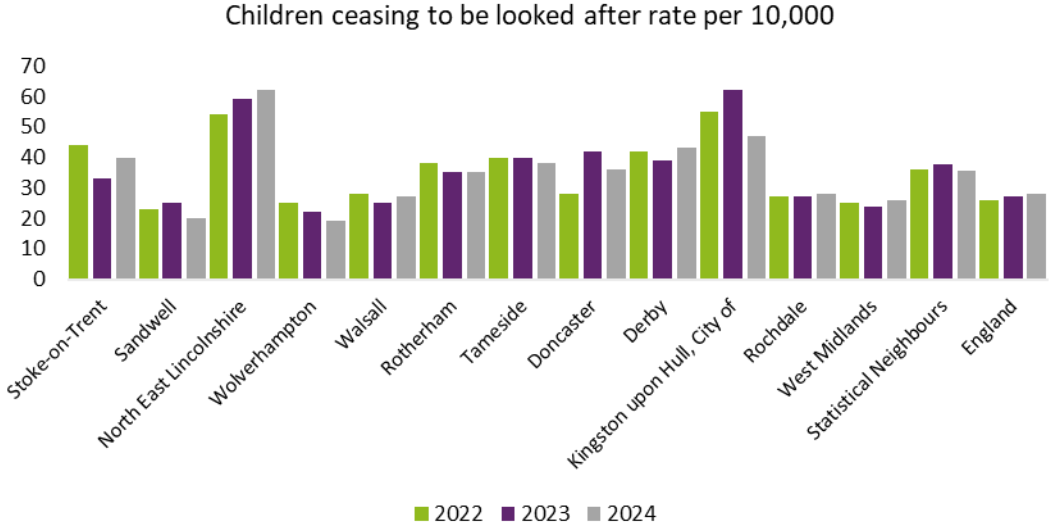

Children Subject to a Child Protection Plan rate per 10,000
100
80
60
40
20
0
Stoke-on-Trent
Sandwell
North East...
Wolverhampton
Walsall
Rotherham
Tameside
Doncaster
Derby
Kingston upon...
Rochdale
Statistical...
England
2022
2023
2024


% children who become subject of a plan for a second or subsequent time
100
80
60
40
20
0
Stoke-on-Trent
Sandwell
North East...
Wolverhampton
Walsall
Rotherham
Tameside
Doncaster
Derby
Kingston upon...
Rochdale
Statistical...
England
2022
2023
2024

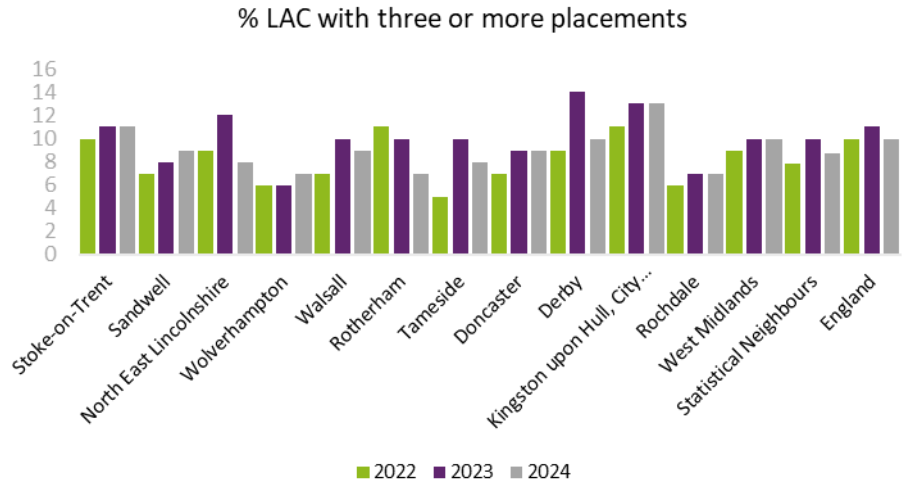
Looked After Children

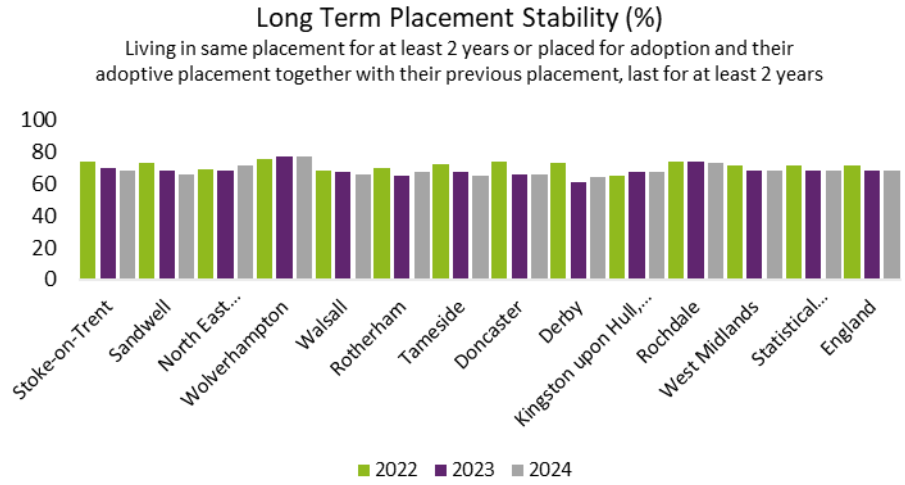


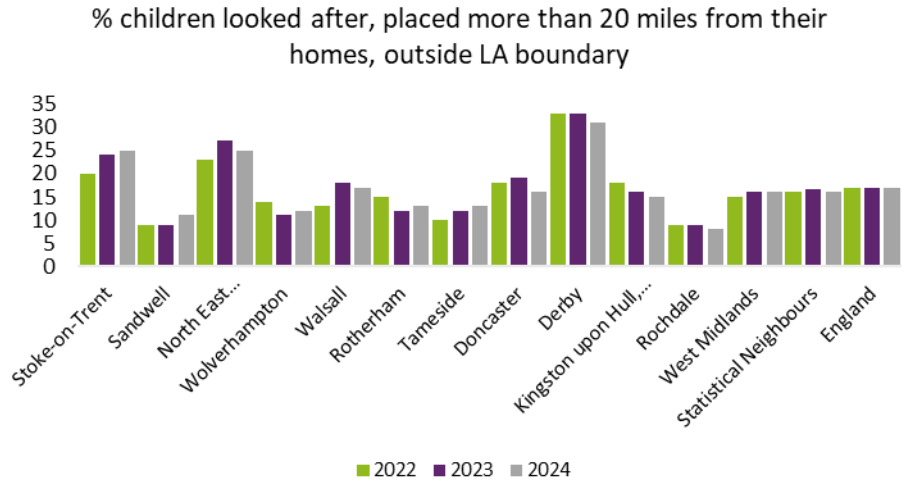


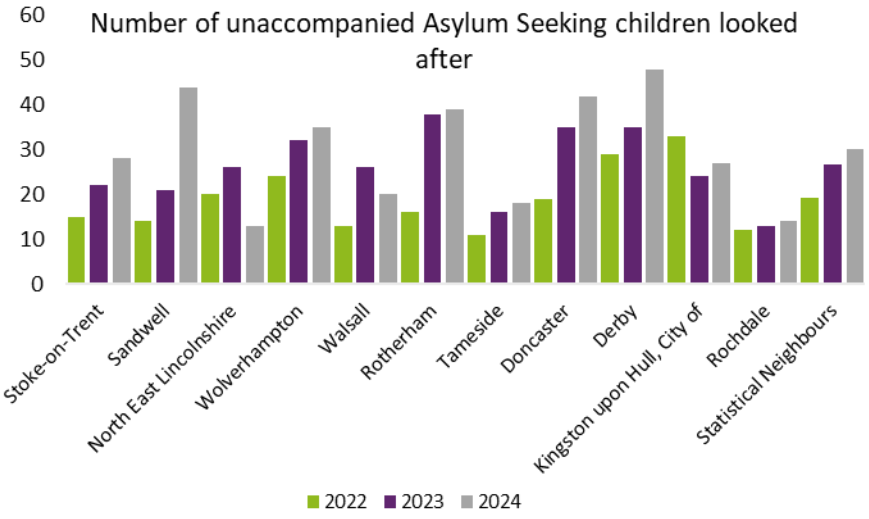


Looked After Children – placements

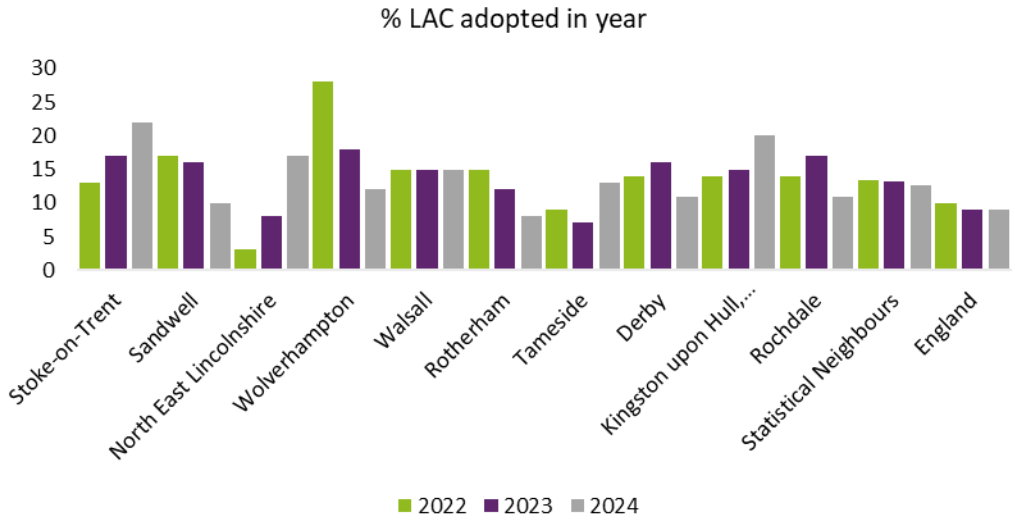


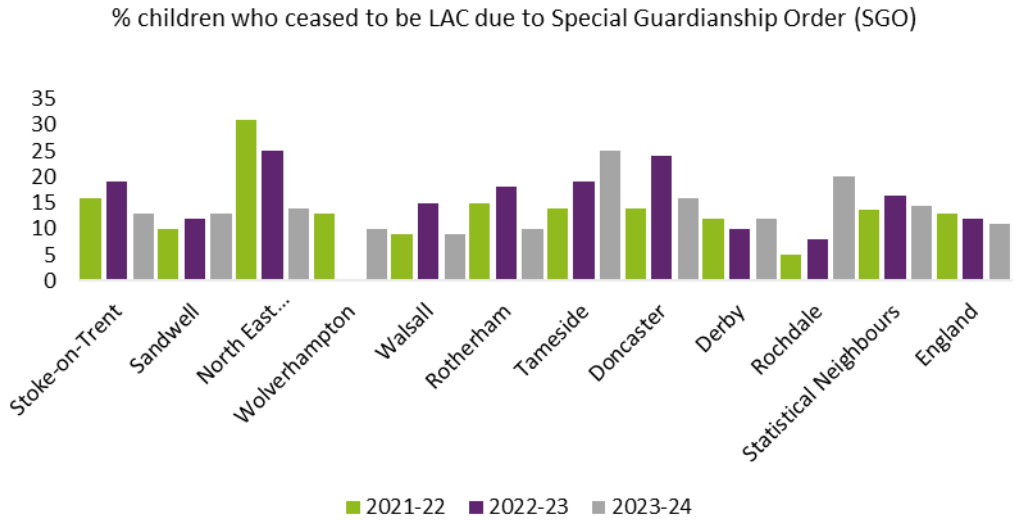


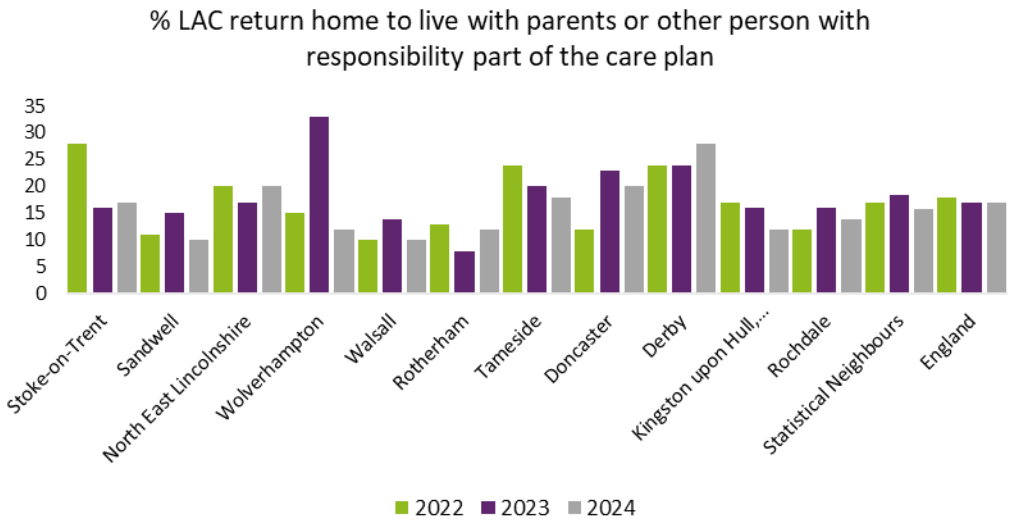




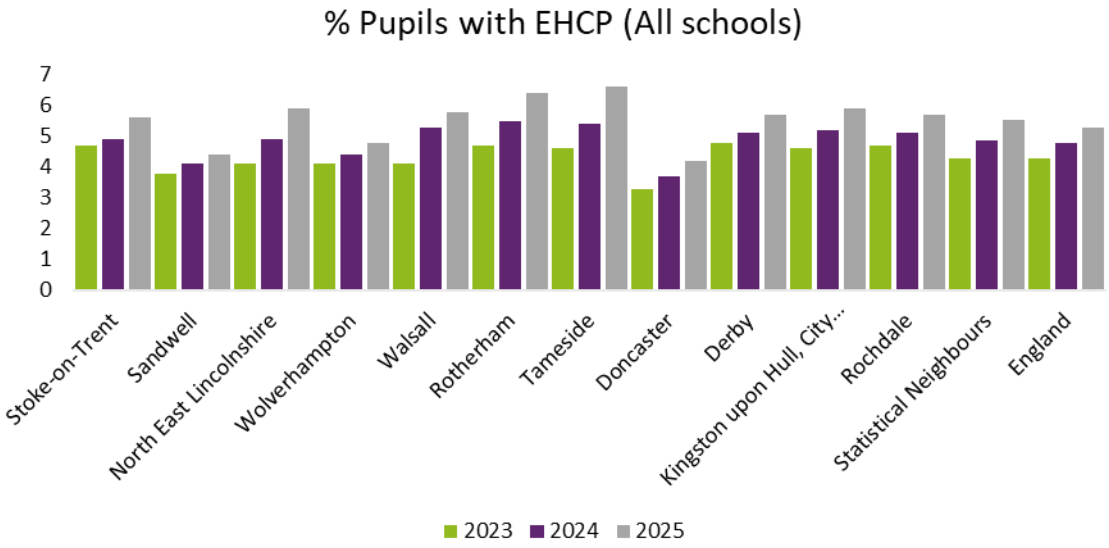
Looked After Children – Adoption, Special Guardianship Order and Returning Home

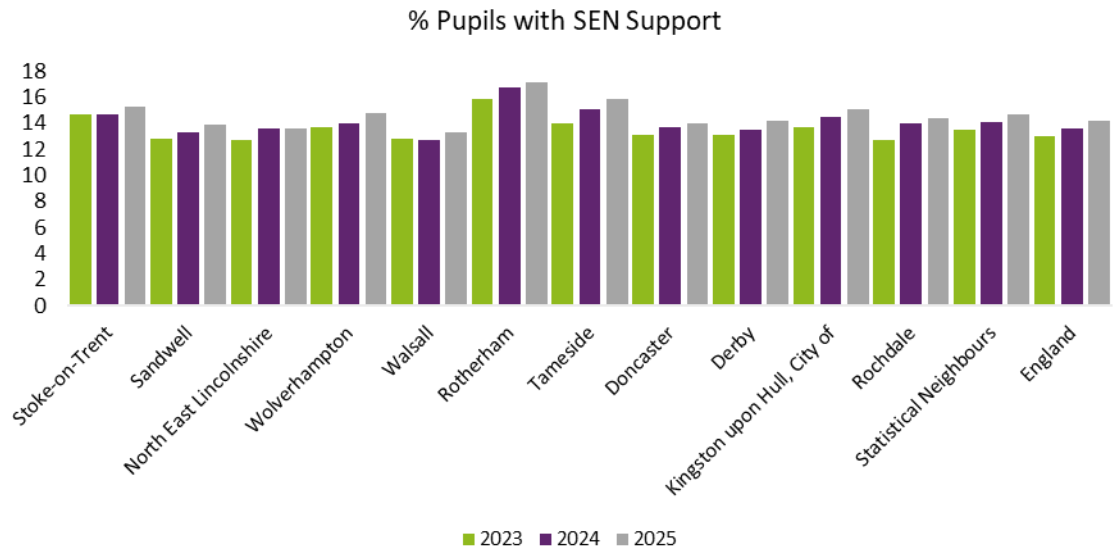






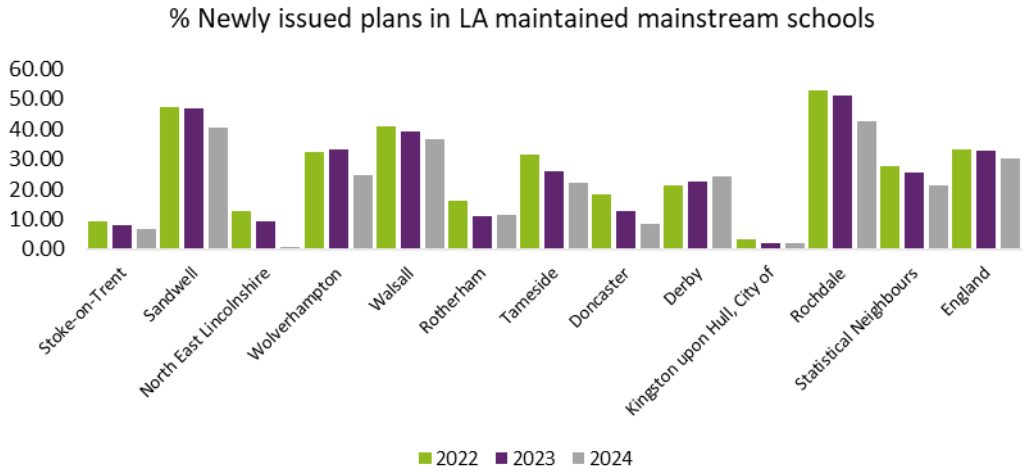
SEND EHCP and SEN support

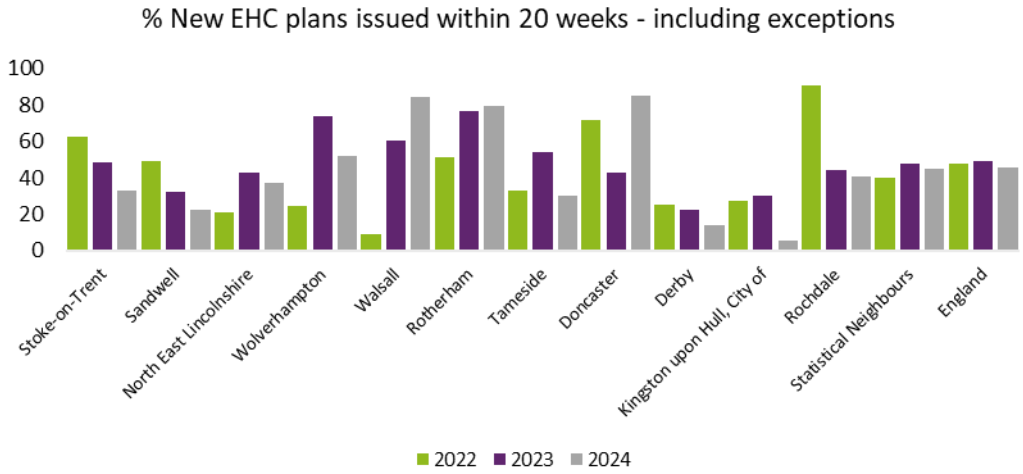


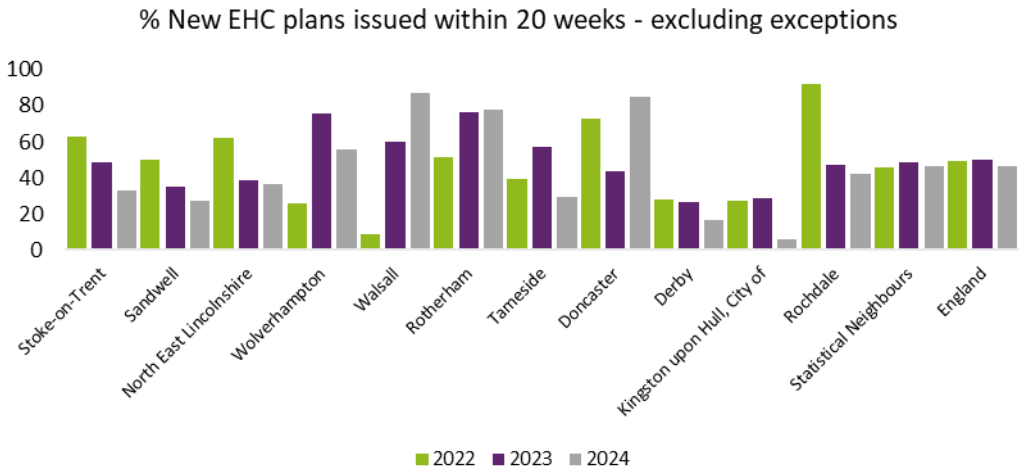


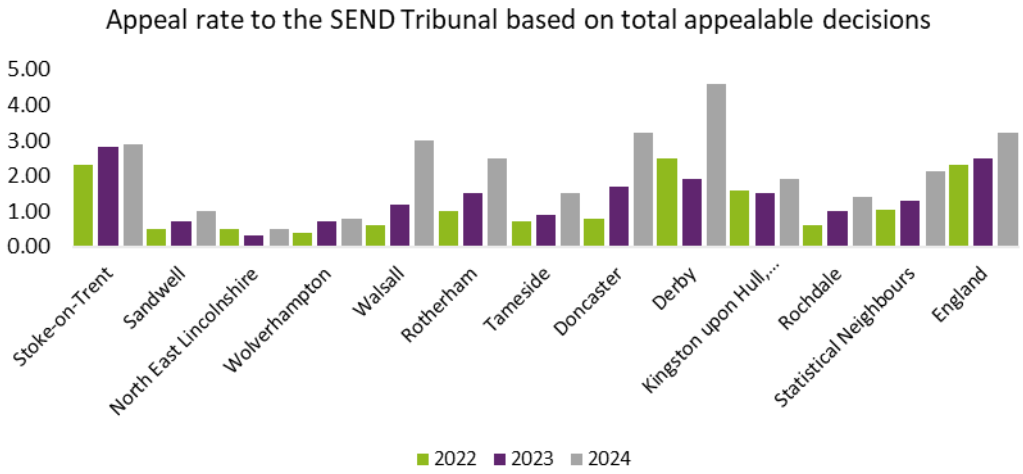
- EHCP and SEN support numbers are in line with statistical neighbours, but as indicated on the following page number of EHCPs issued with 20 weeks are low and appeals high.

SEND – EHCPs and SEN Tribunals

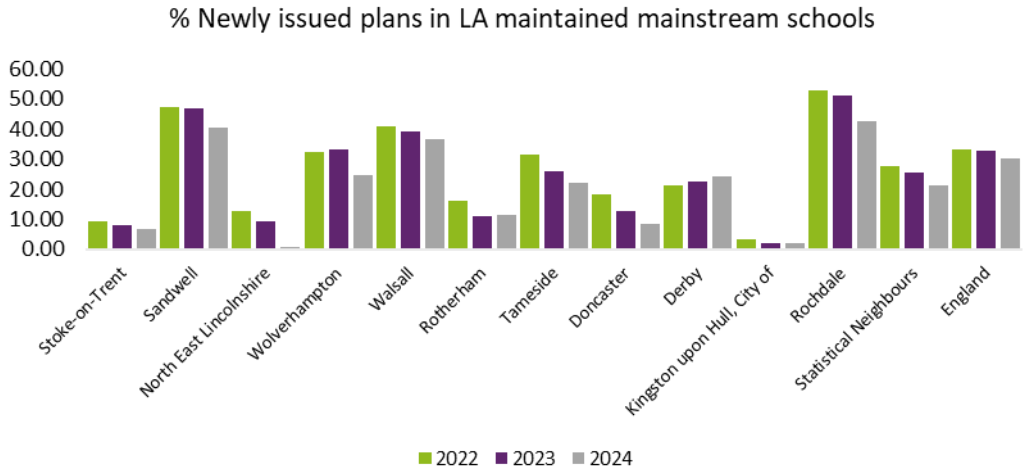


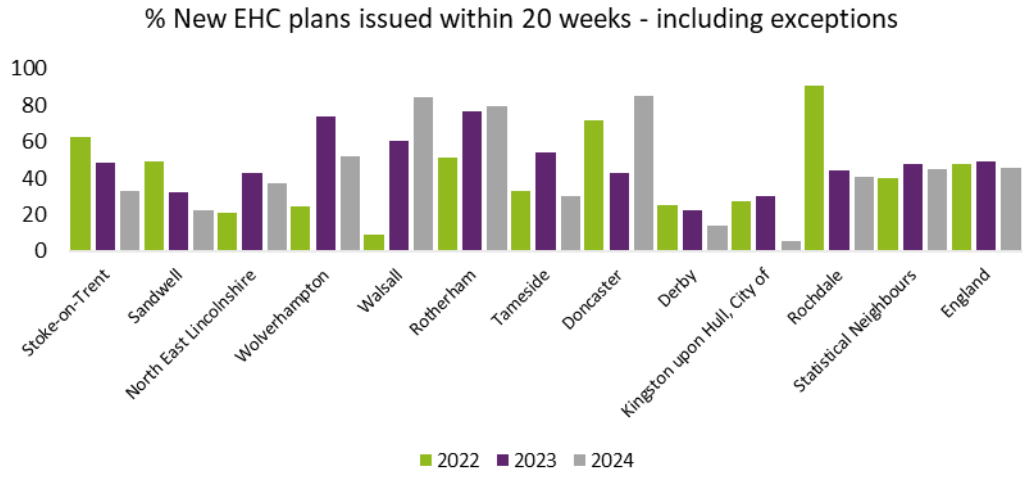

% New EHC plans issued within 20 weeks - including exceptions
100
80
60
40
20
0
Stoke-on-Trent
Sandwell
North East Lincolnshire
Wolverhampton
Walsall
Rotherham
Tameside
Doncaster
Derby
Kingston upon Hull, City of
Rochdale
Statistical Neighbours
England
2022
2023
2024

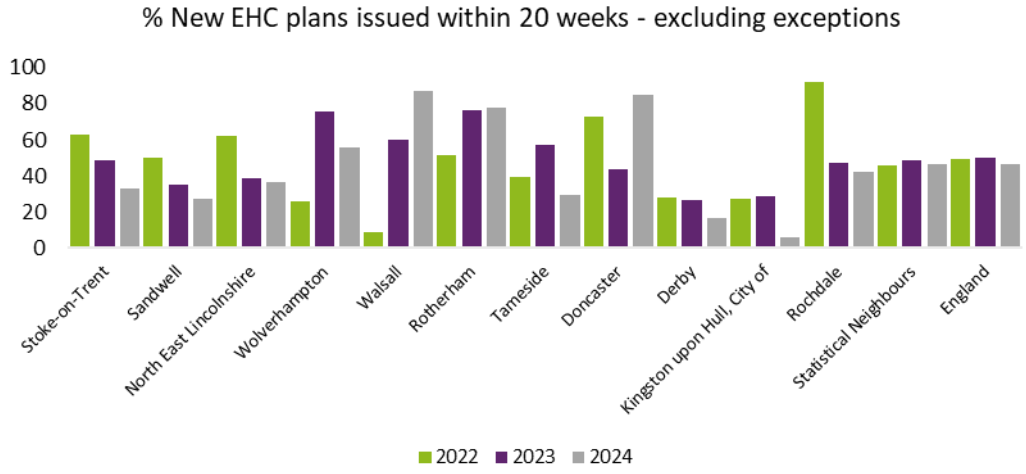

% New EHC plans issued within 20 weeks - excluding exceptions
100
80
60
40
20
0
Stoke-on-Trent
Sandwell
North East Lincolnshire
Wolverhampton
Walsall
Rotherham
Tameside
Doncaster
Derby
Kingston upon Hull, City of
Rochdale
Statistical Neighbours
England
2022
2023
2024

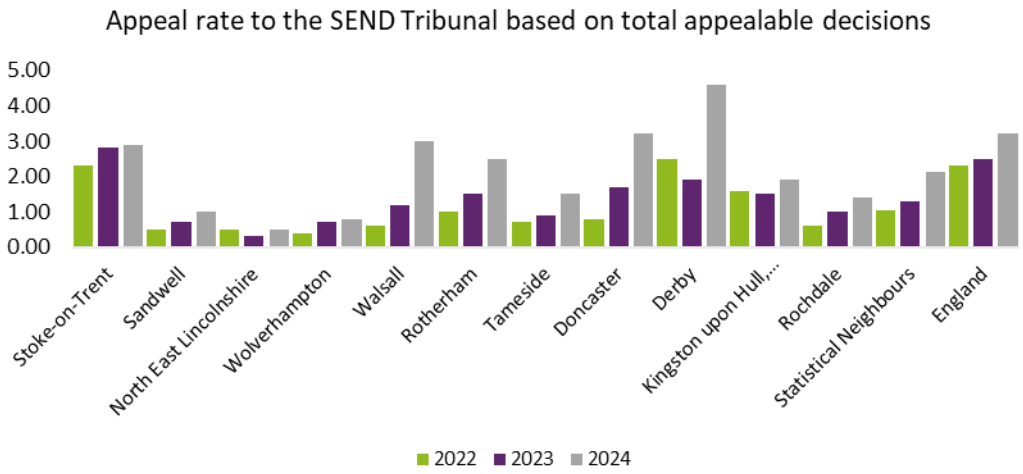

Appeal rate to the SEND Tribunal based on total appealable decisions
5.00
4.00
3.00
2.00
1.00
0.00
Stoke-on-Trent
Sandwell
North East Lincolnshire
Wolverhampton
Walsall
Rotherham
Tameside
Doncaster
Derby
Kingston upon Hull,...
Rochdale
Statistical Neighbours
England
2022
2023
2024

SEND – EHCPs and SEN Tribunals

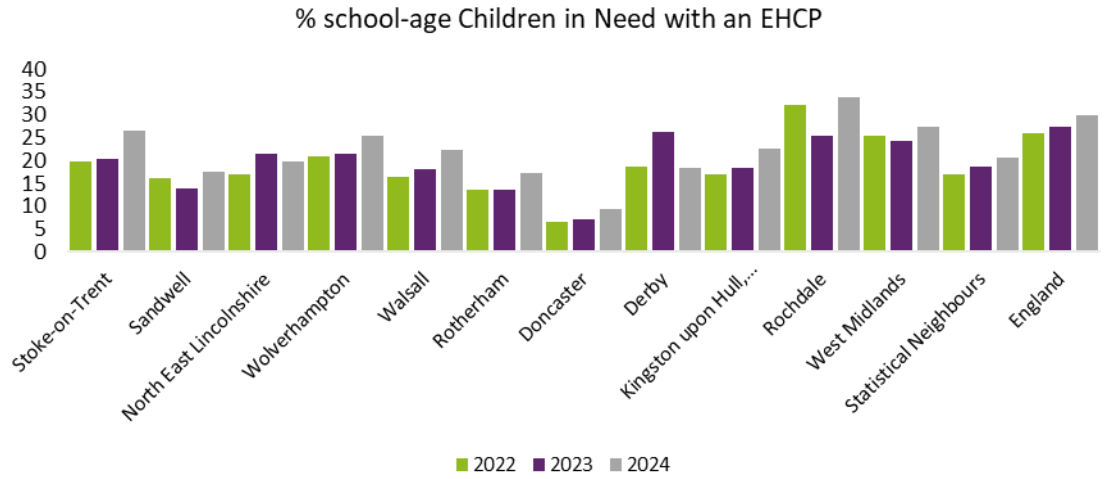


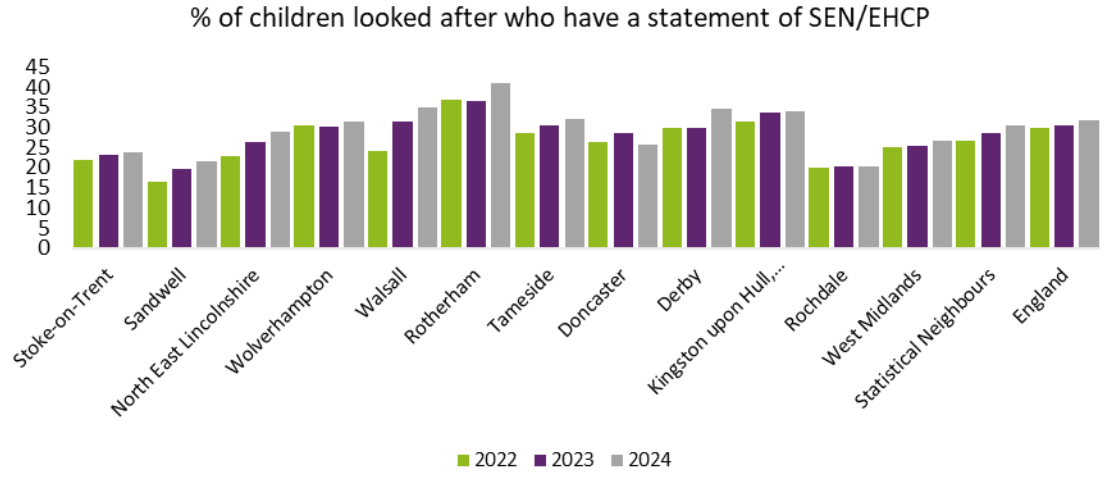


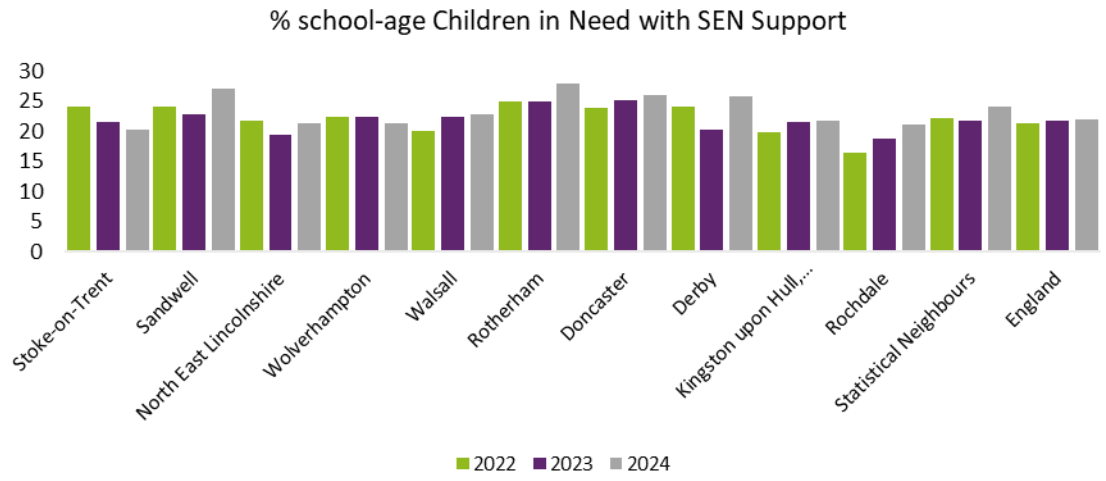




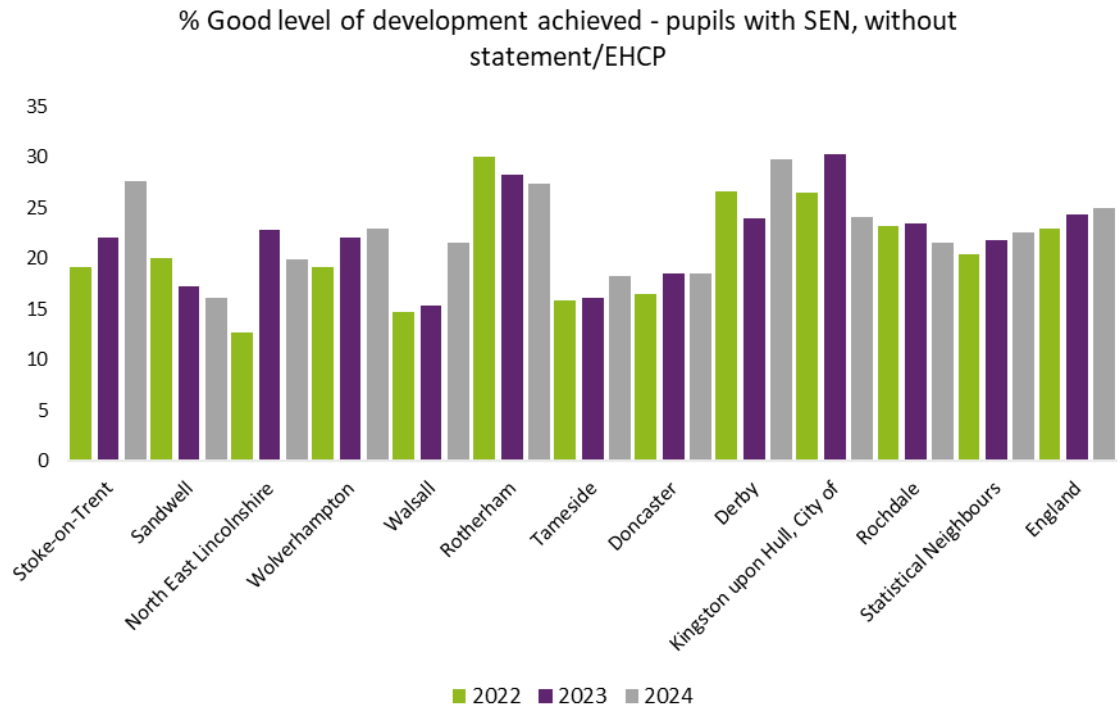
SEND – EHCPs and SEN support – CiN and LAC

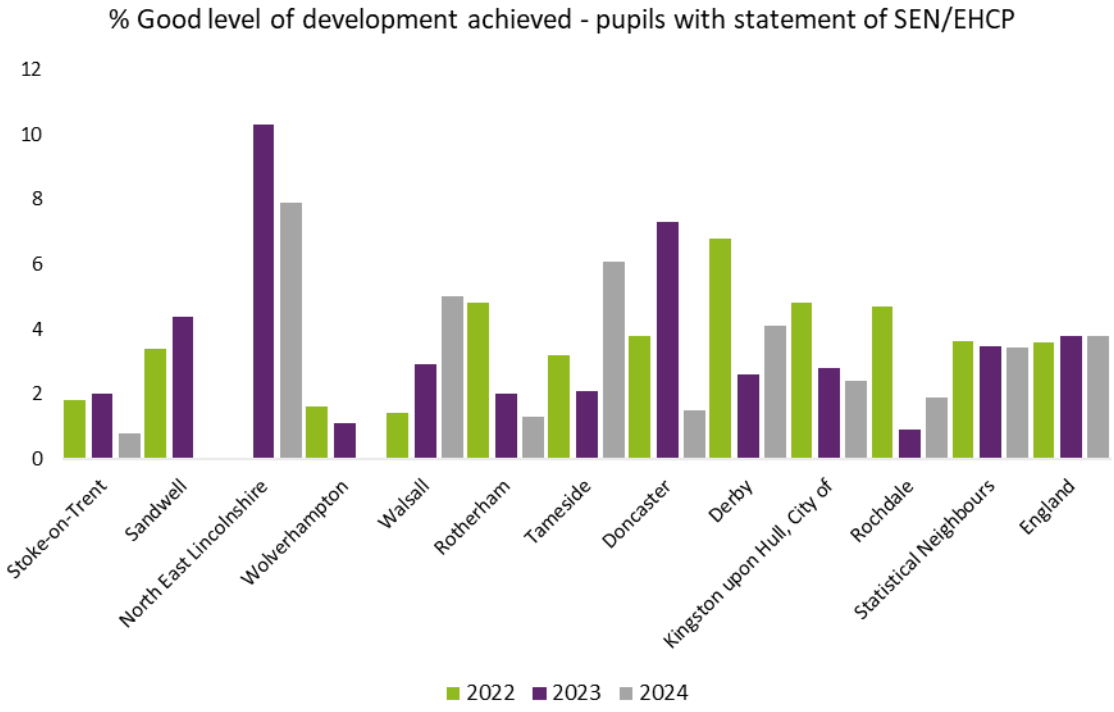




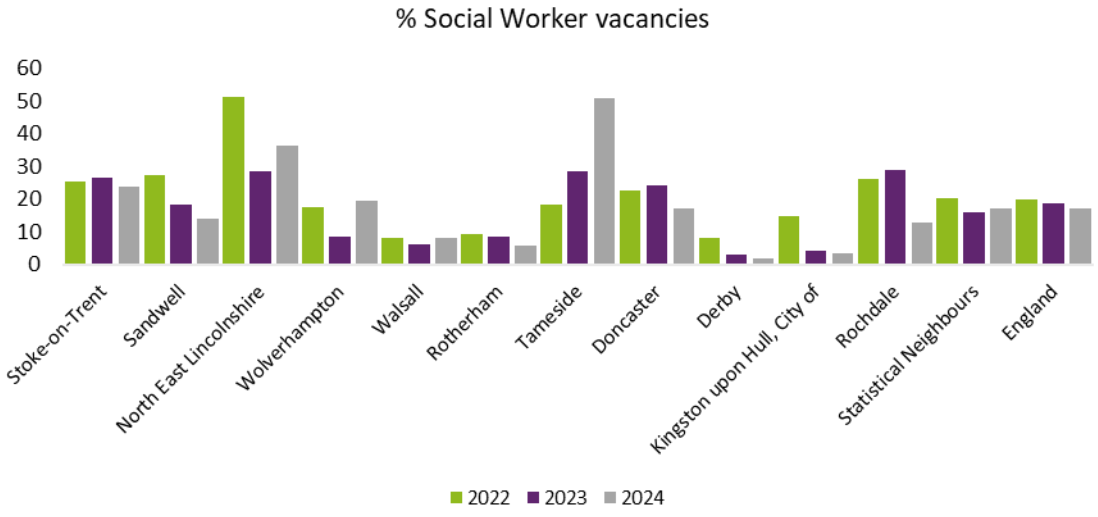


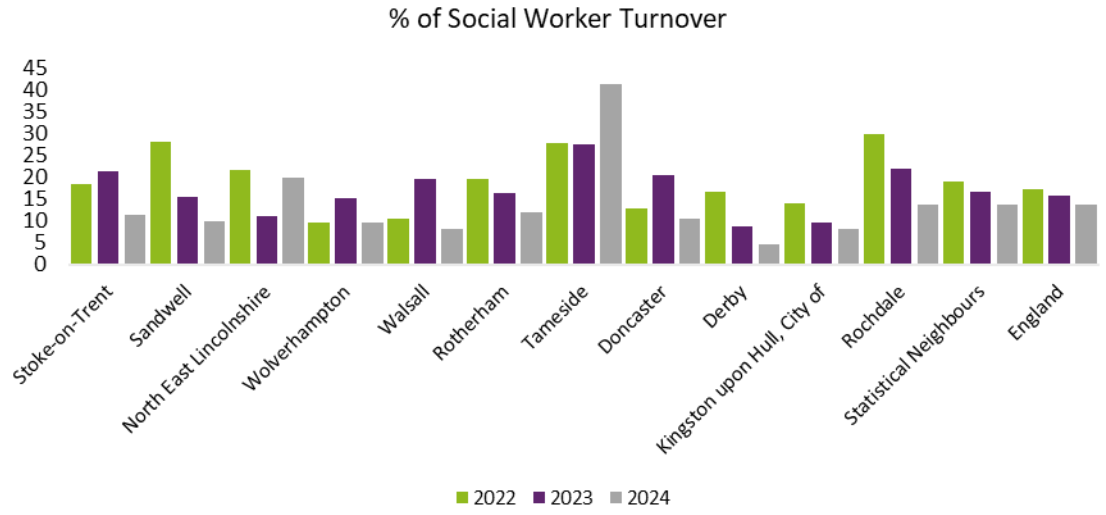
Foundation stages

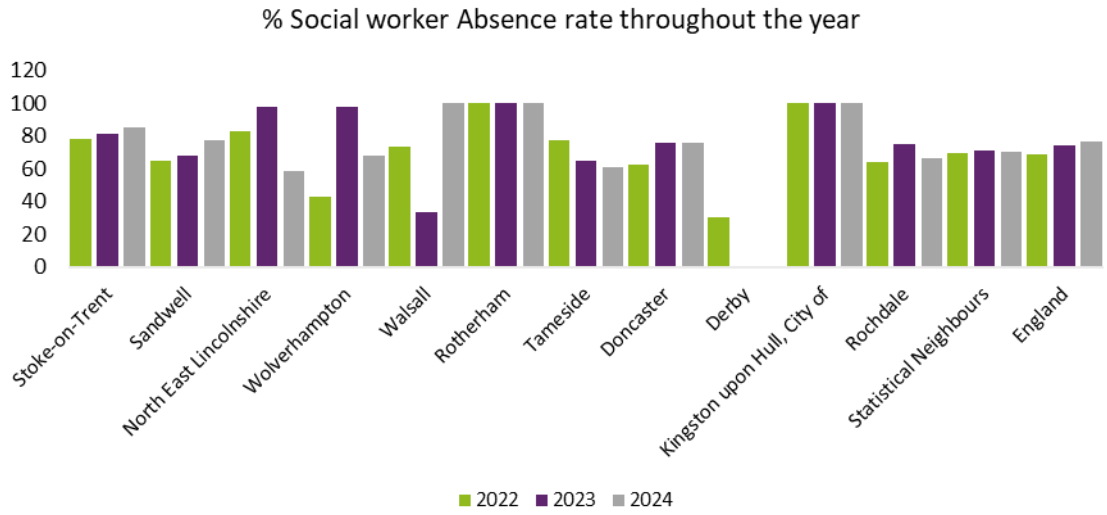




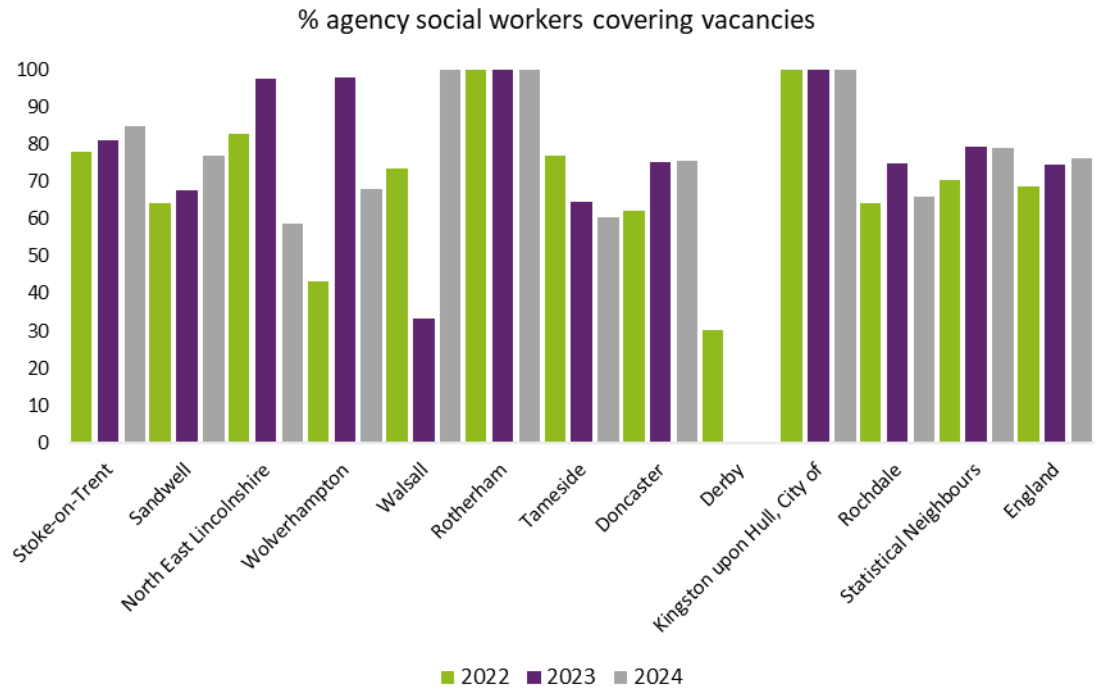
Children's Workforce part 1

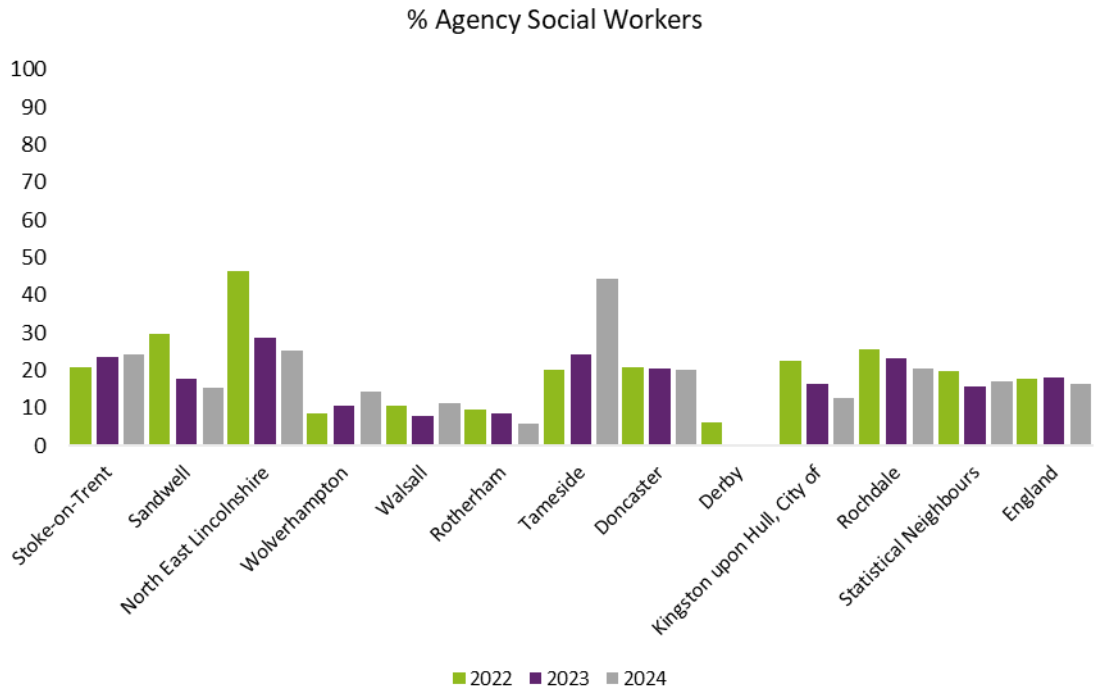



% of Social Worker Turnover
45
40
35
30
25
20
15
10
5
0
Stoke-on-Trent
Sandwell
North East Lincolnshire
Wolverhampton
Walsall
Rotherham
Tameside
Doncaster
Derby
Kingston upon Hull, City of
Rochdale
Statistical Neighbours
England
2022
2023
2024


% Social worker Absence rate throughout the year
120
100
80
60
40
20
0
Stoke-on-Trent
Sandwell
North East Lincolnshire
Wolverhampton
Walsall
Rotherham
Tameside
Doncaster
Derby
Kingston upon Hull, City of
Rochdale
Statistical Neighbours
England
2022
2023
2024

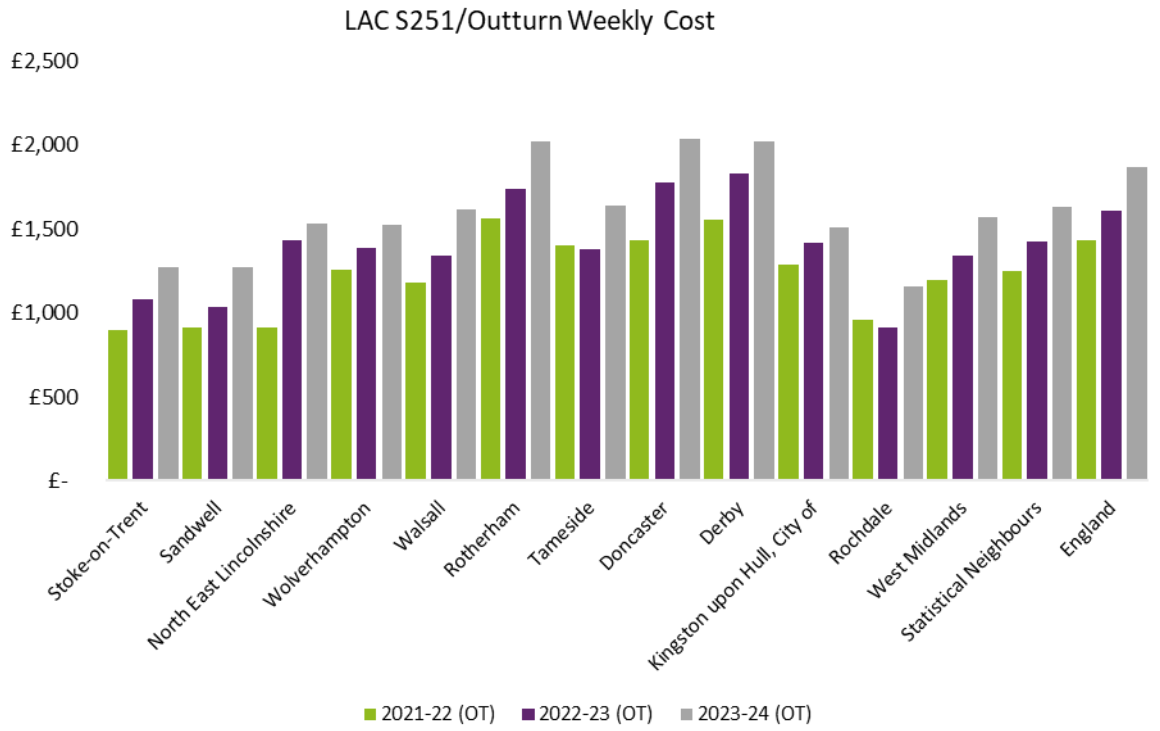
Children's Workforce part 2

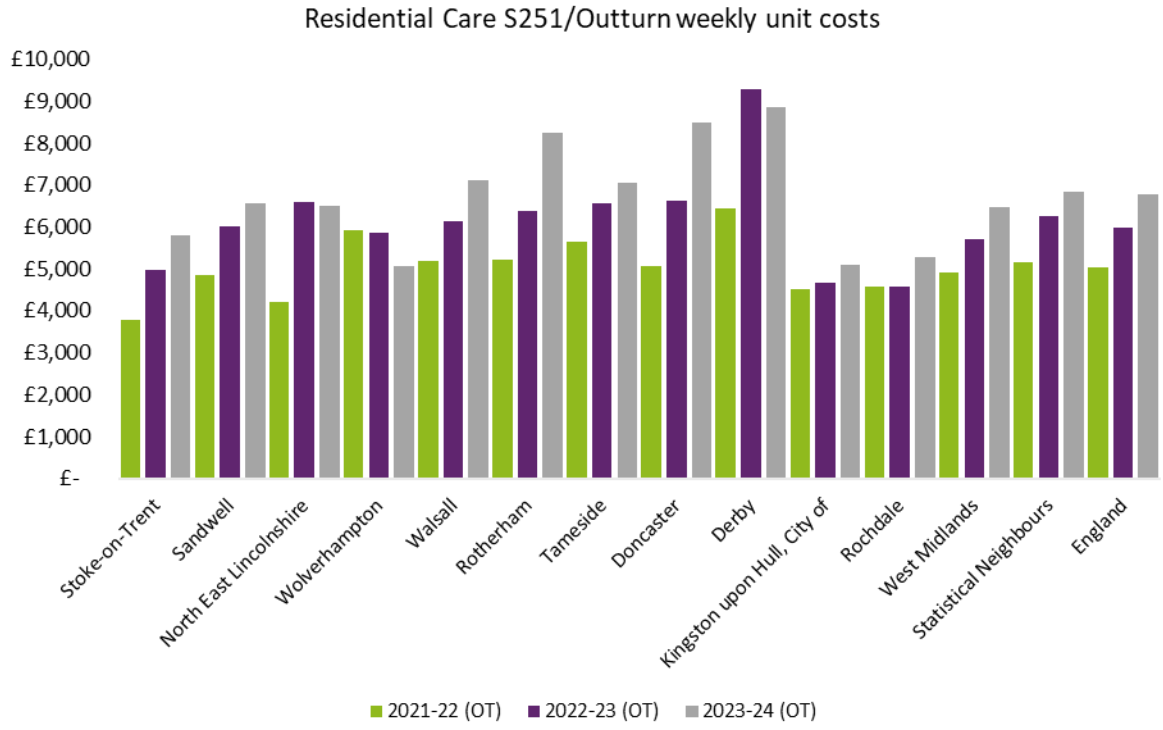




Note: % agency social workers covering vacancies - % above 100 are accurate reporting figures

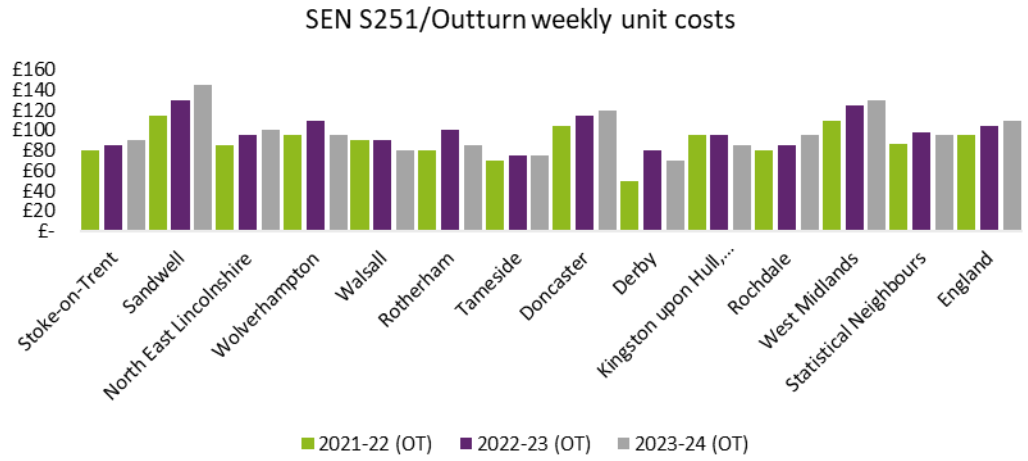
Finance – average weekly costs

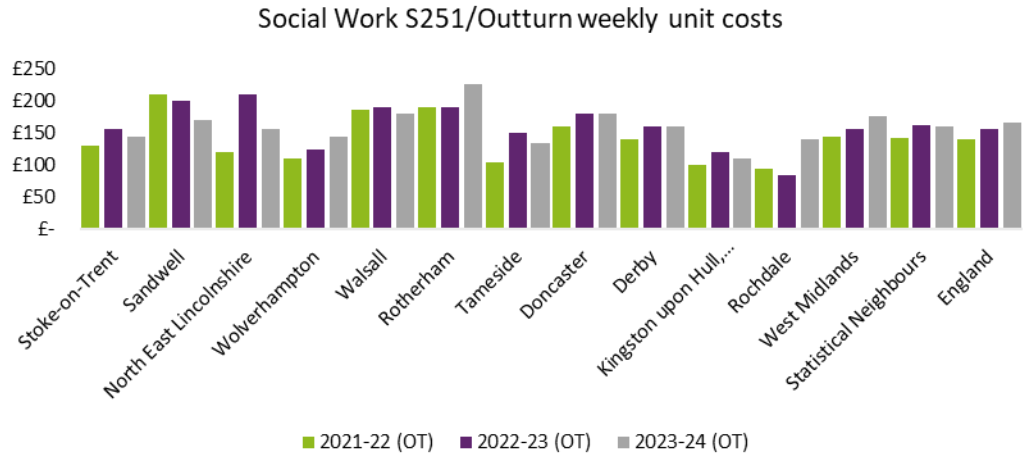


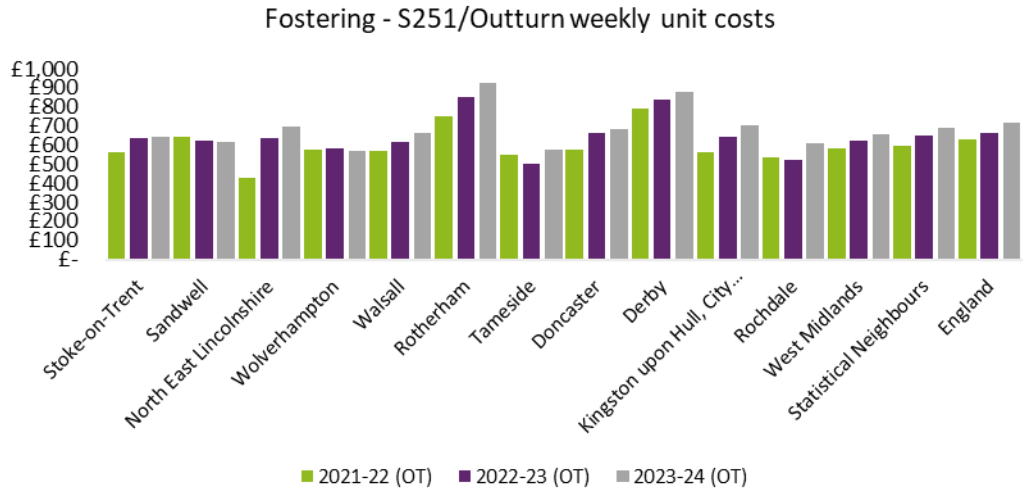


- LAC weekly unit costs are low and considerably lower than both statistical neighbours and England average. This is supported by lower residential and fostering rates

Finance – average weekly unit costs

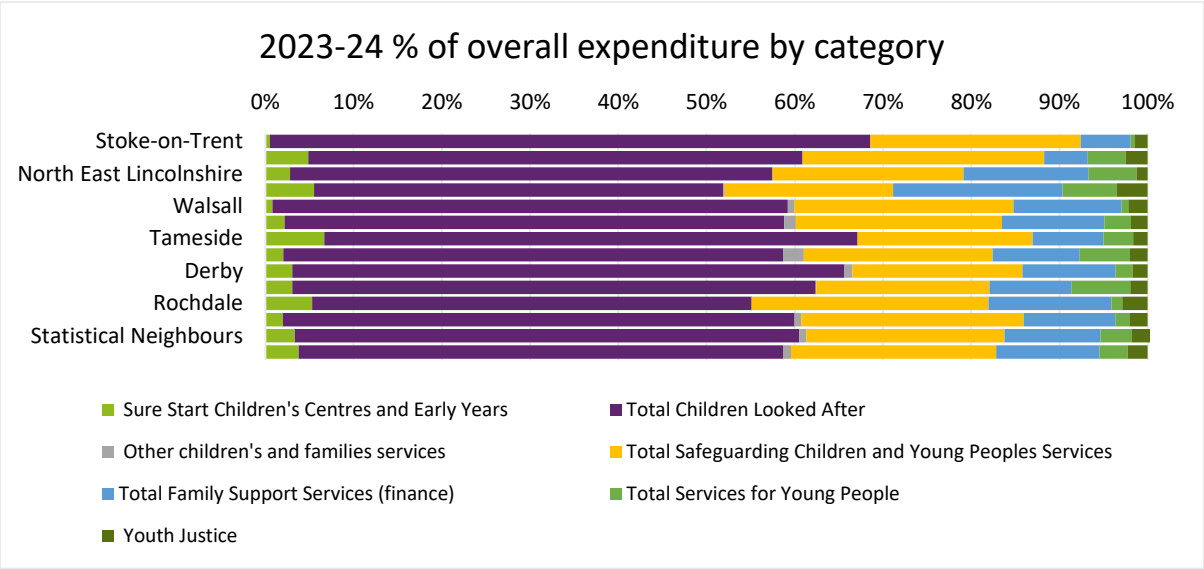




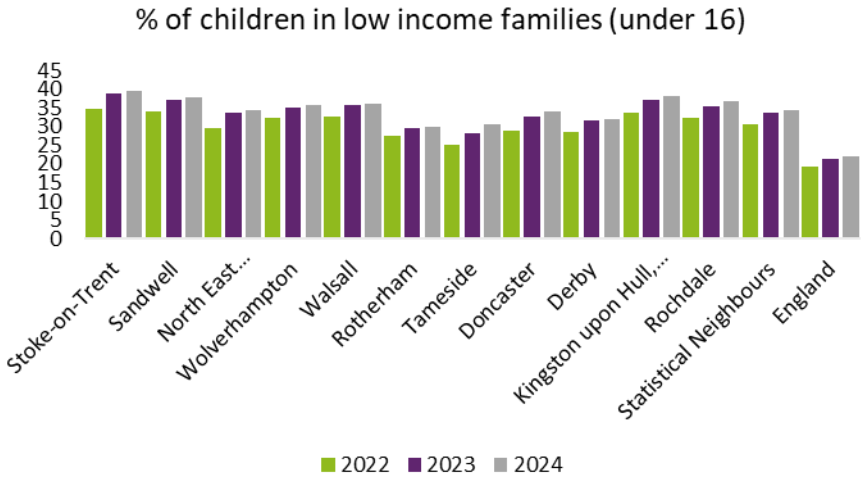


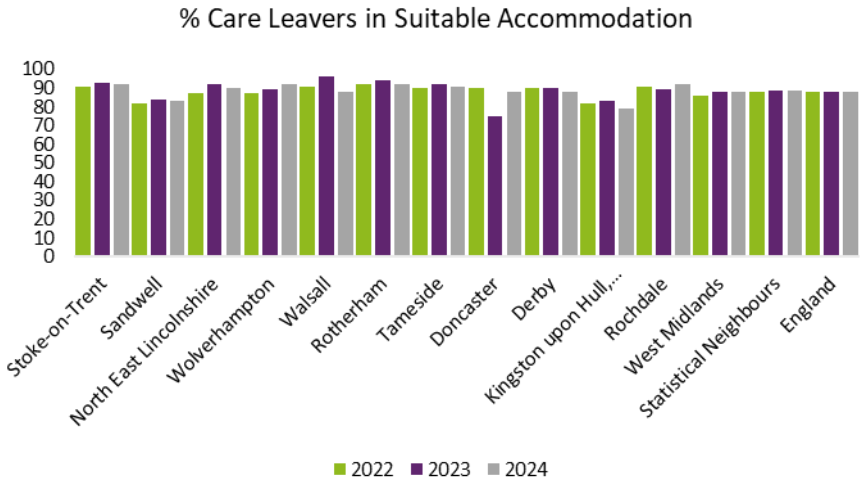
- SEN weekly outturn costs are in line with statistical neighbours.

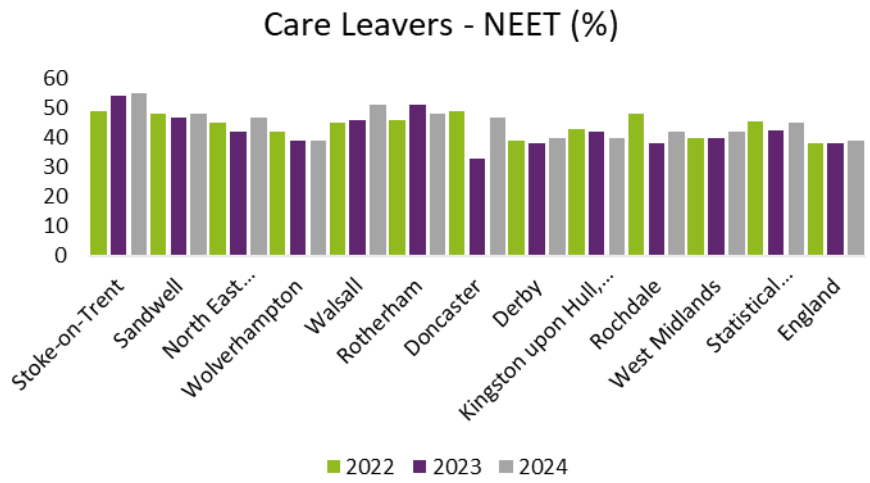
Finance – Budget and expenditure

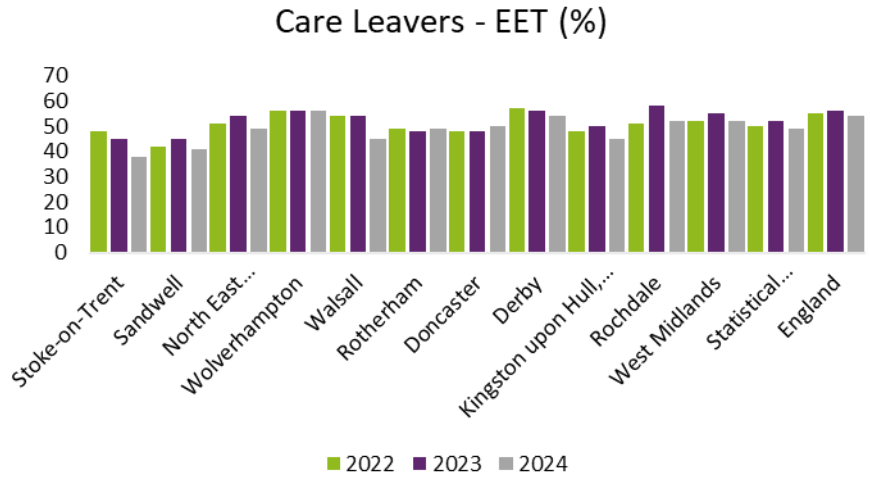


Wider Context





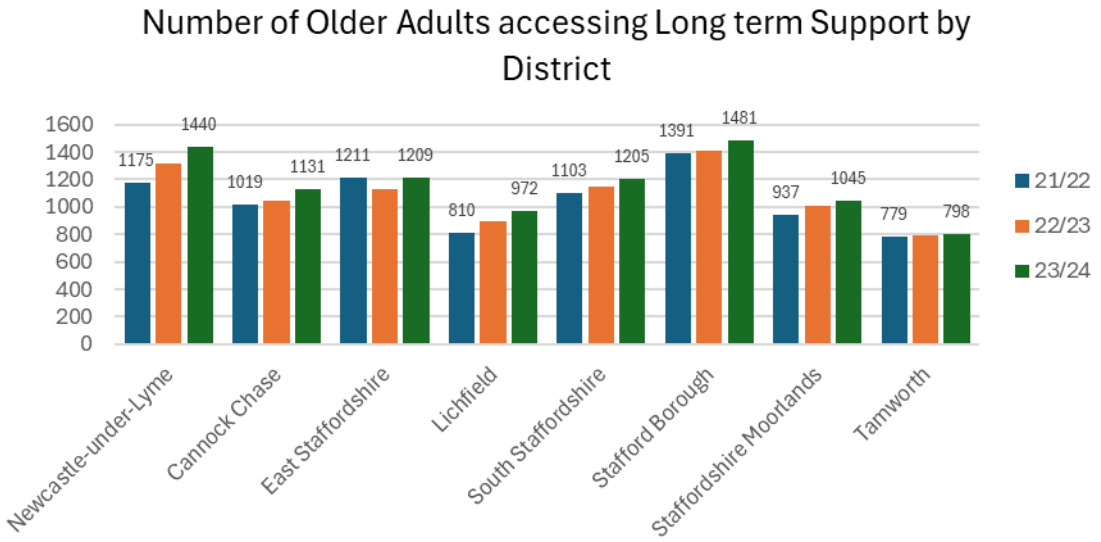

Care Leavers - NEET (%)
60
50
40
30
20
10
0
Stoke-on-Trent
Sandwell
North East...
Wolverhampton
Walsall
Rotherham
Doncaster
Derby
Kingston upon Hull,...
Rochdale
West Midlands
Statistical...
England
2022
2023
2024

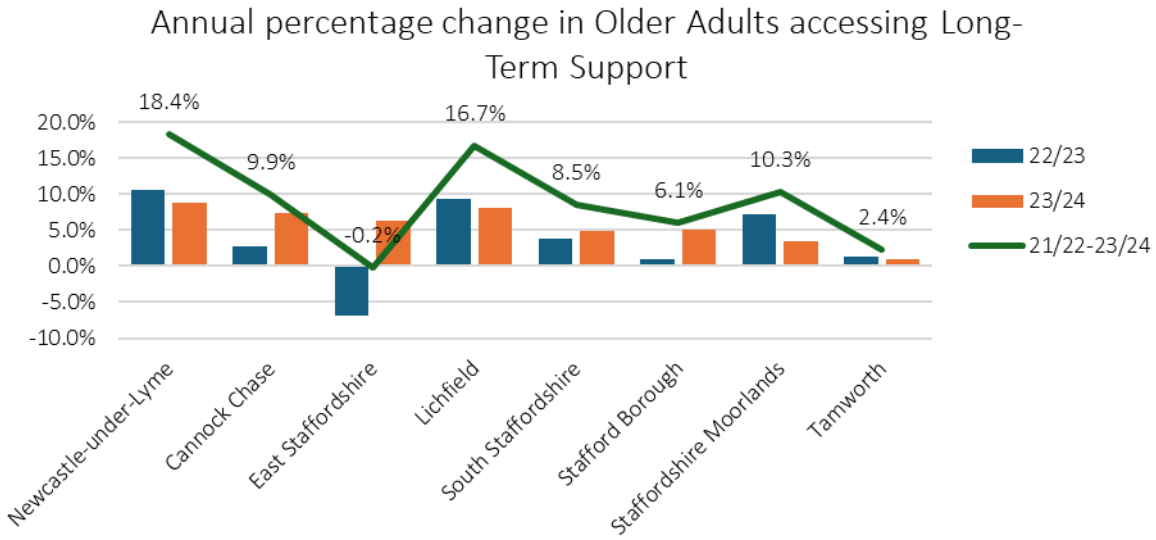

Care Leavers - EET (%)
70
60
50
40
30
20
10
0
Stoke-on-Trent
Sandwell
North East...
Wolverhampton
Walsall
Rotherham
Doncaster
Derby
Kingston upon Hull,...
Rochdale
West Midlands
Statistical...
England
2022
2023
2024

Adults social care

Adult social care demand – Staffordshire districts and boroughs

The Number of Older Adults (65+) accessing Long-Term Support

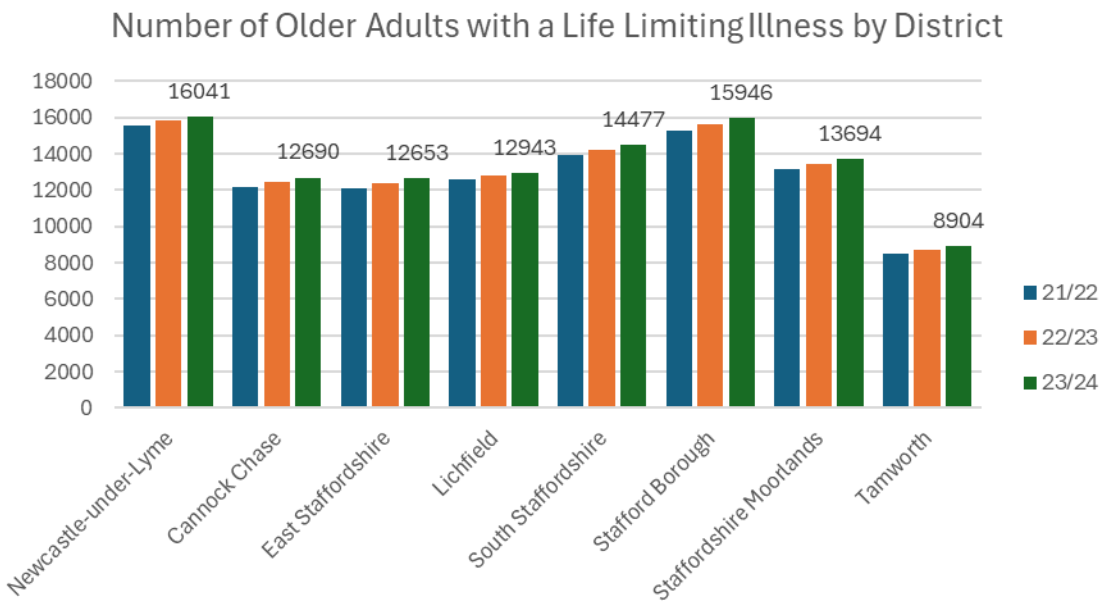


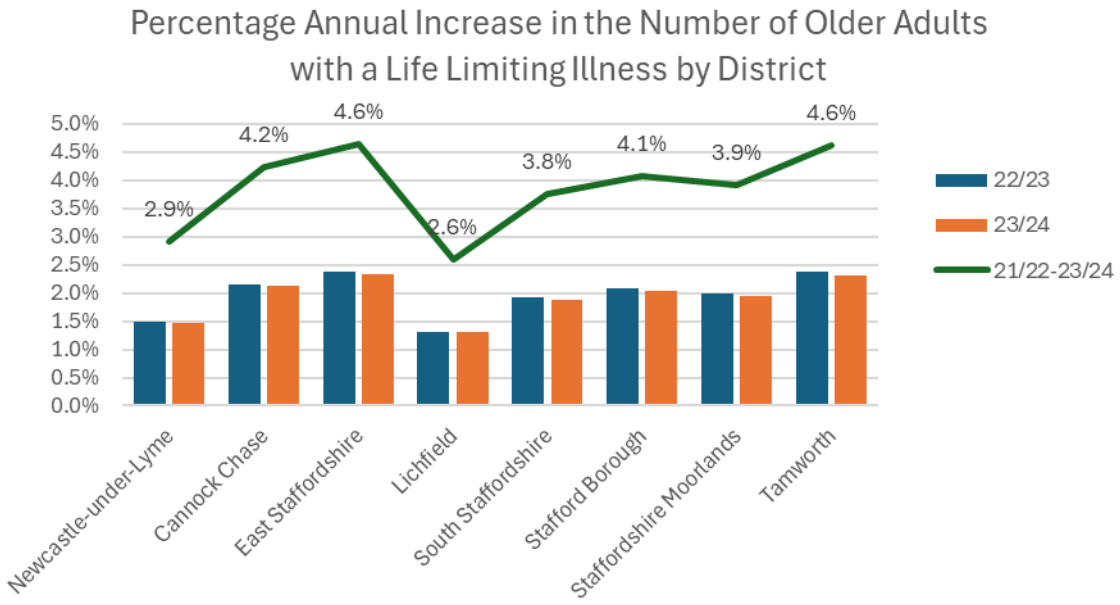


- In 2021/22 Newcastle-under-Lyme had **the second largest number of Older Adults accessing long-term support with 1175**.
- This rose **by 265 to 1440 in 2023/24**, with NULBC remaining the second highest district in terms of older adults ASC demand, **second to Stafford Borough Council where 1481** 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

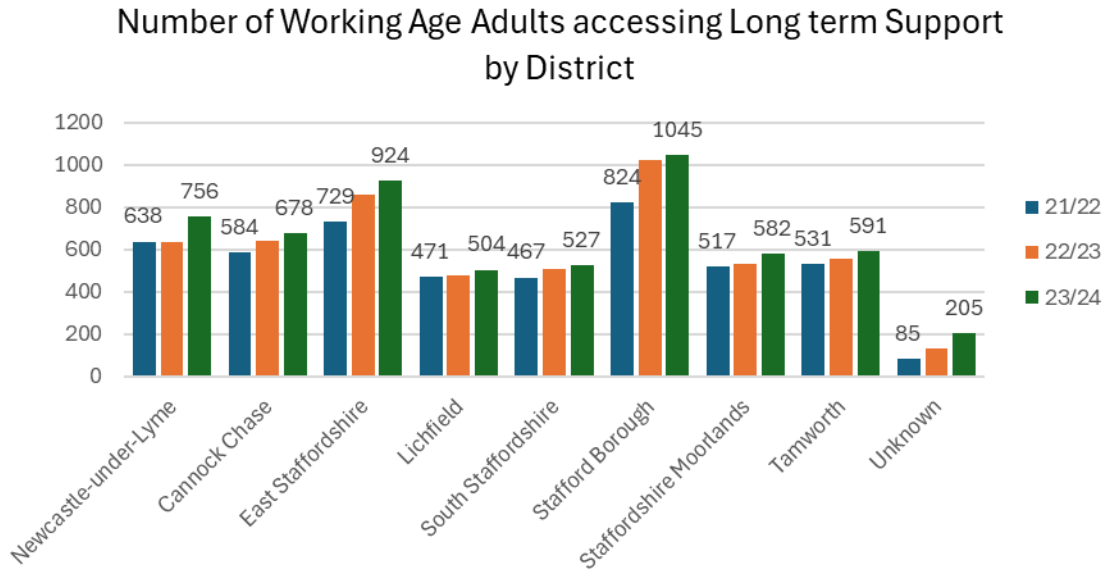


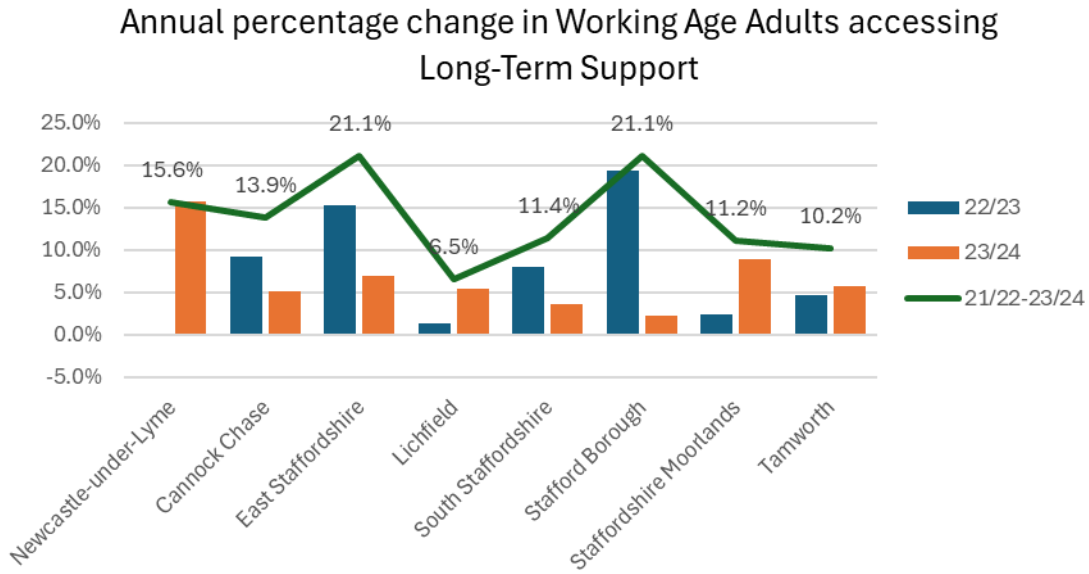


- In 2021/22 Newcastle-under-Lyme had **the highest number of Oldest Adults with a life limiting illness**, with 15,573 within the district, out of the Staffordshire Districts. By 2023/24 Newcastle-under-Lyme remained the highest district council by number of older adults who have a **life limiting illness 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.

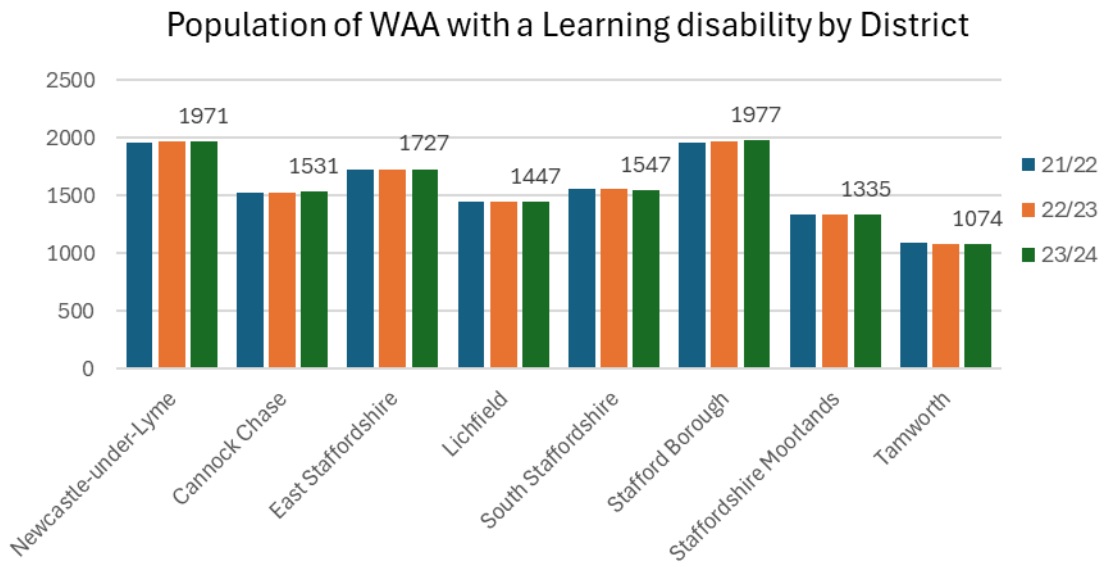
The Number of Working Age Adults (18-64) accessing Long-Term Support

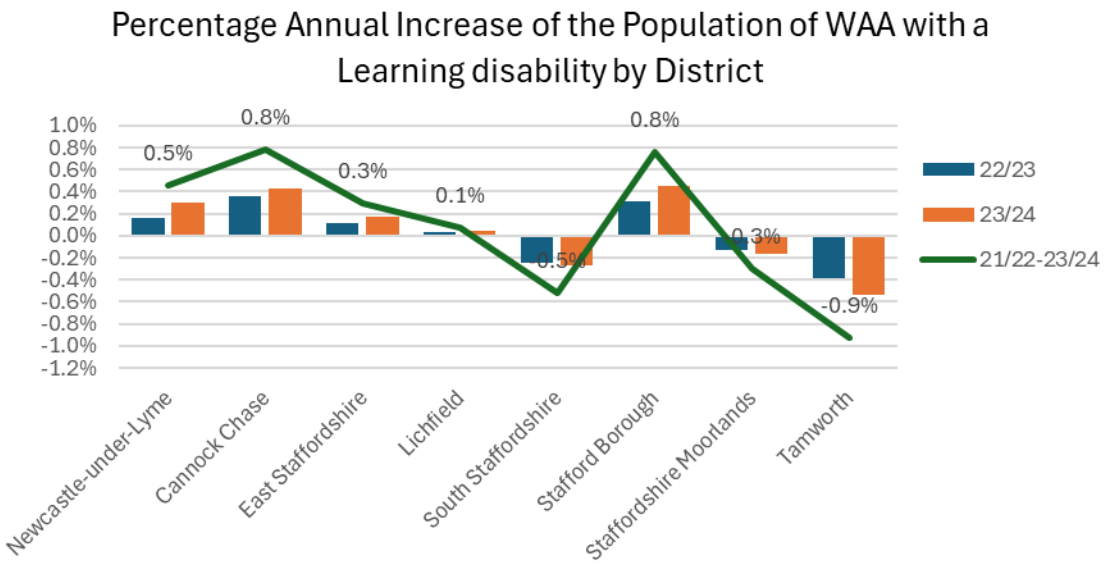




- The number of Working Age Adults who accessed long-term support in Newcastle-under-Lyme in **2021/22 was 638**, this rose to **756 in 23/24** where Newcastle was the **third highest district by overall WAA demand**, below East Staffordshire (924) and Stafford (1045).
- The rate of increase experienced 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



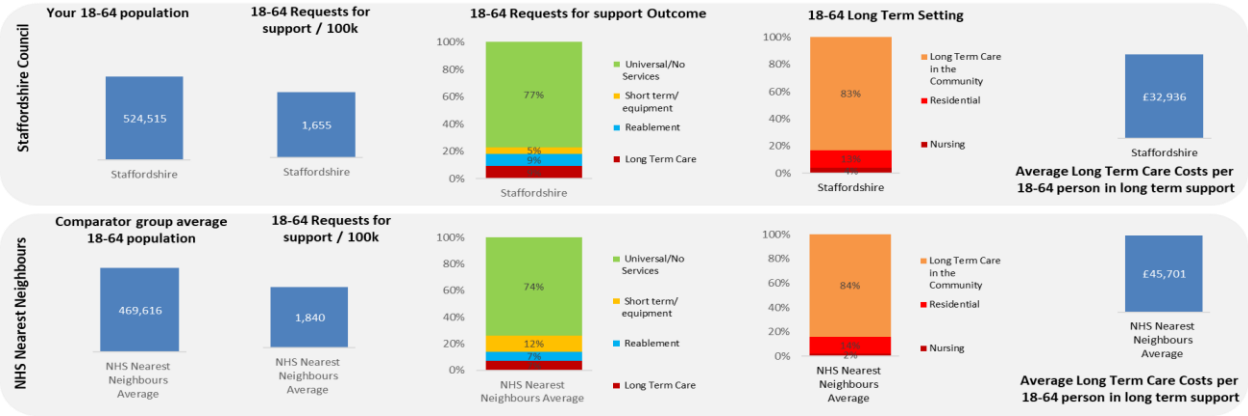


- The number of working age adults with a learning disability rose from **1962 in 2021/22 to 1971 in 2023/24** in Newcastle-under-Lyme. With the district the **second highest in terms of number of working age adults with a learning disability** with only Stafford (1977) having a greater population – 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?

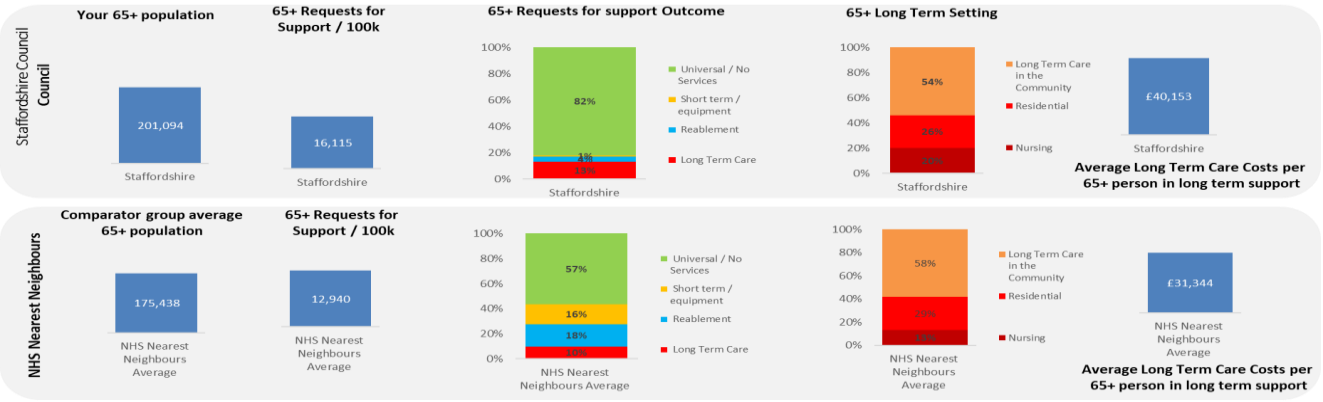
Working age adults (18-64)



- 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.

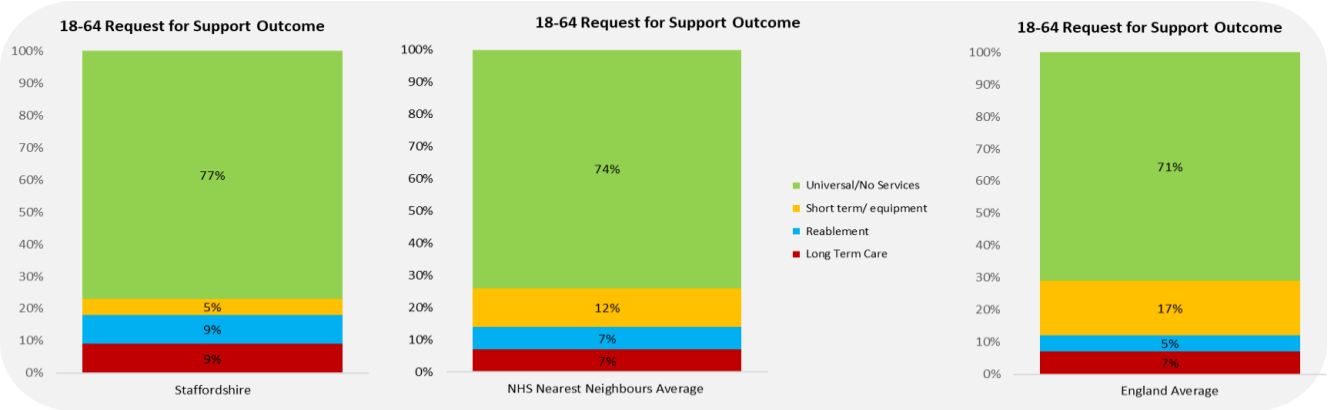
How does your system manage demand?

Older adults (65+)

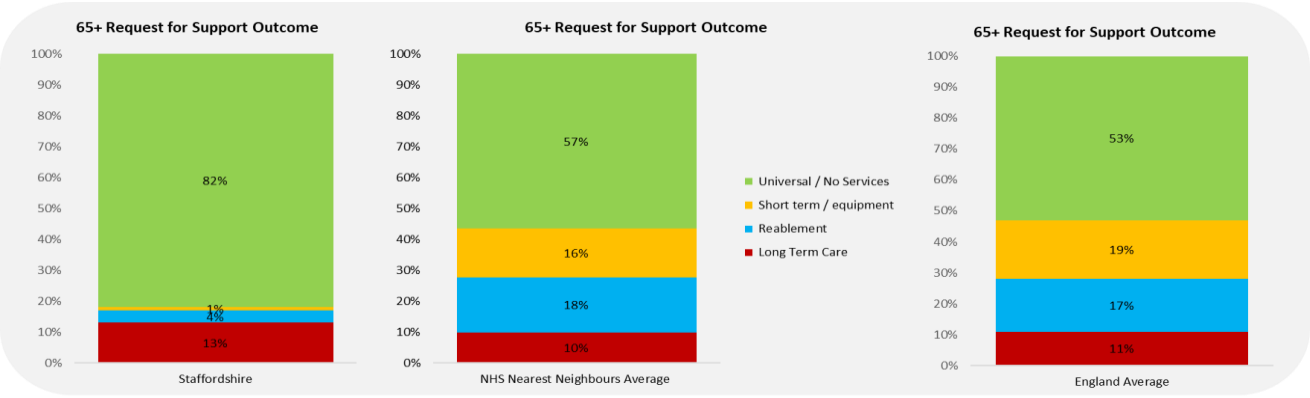


- Average spend on long term care for older adults is much higher than NHS Nearest Neighbours (NHS statistical neighbours)

Assessment Outcome for 18-64

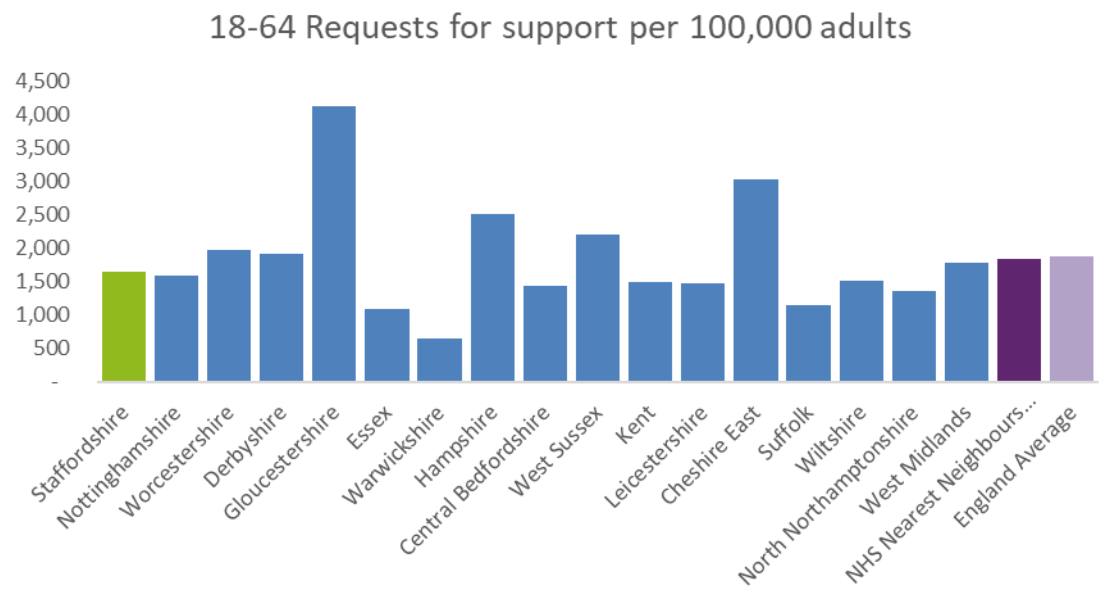


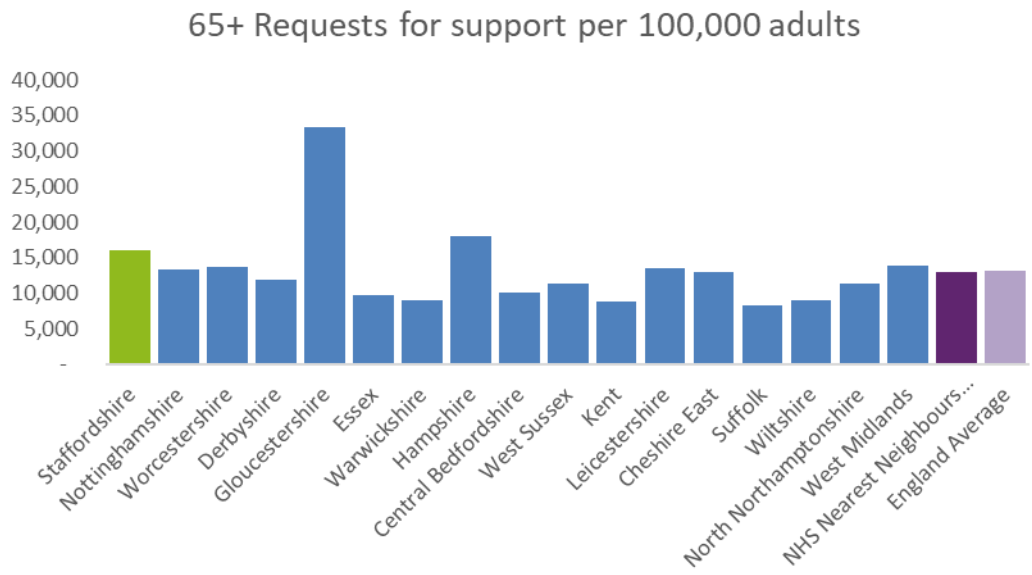
Assessment Outcome for 65+



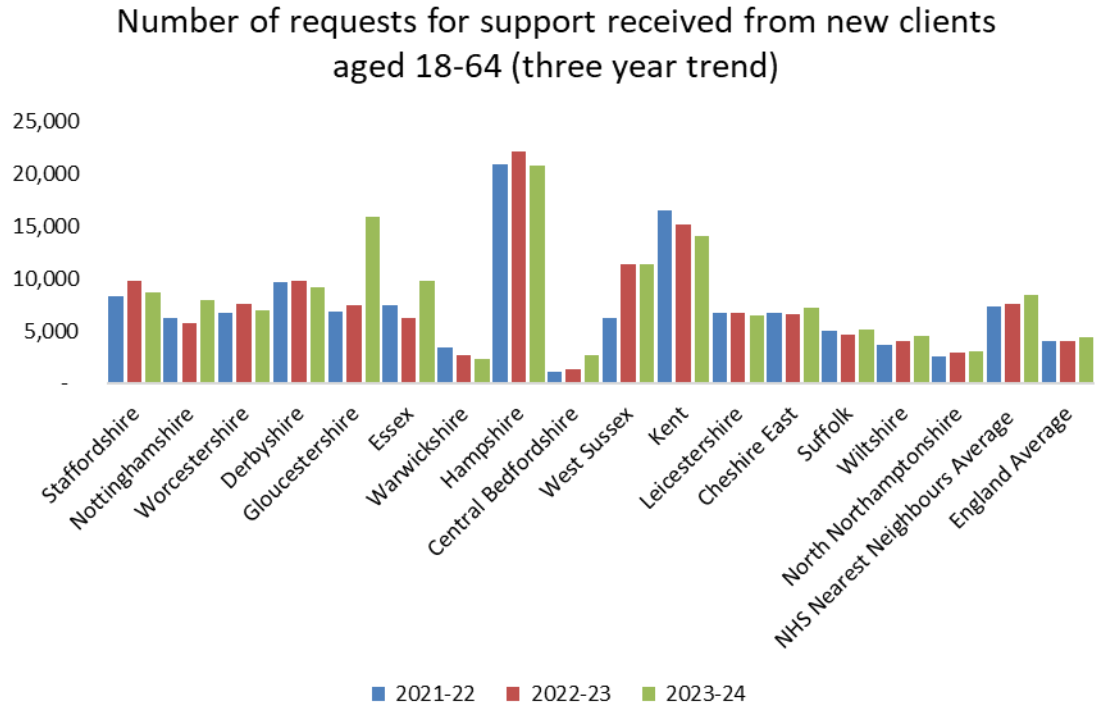
Percentages may not total 100% due to return in some categories of <5 not counted in total figures

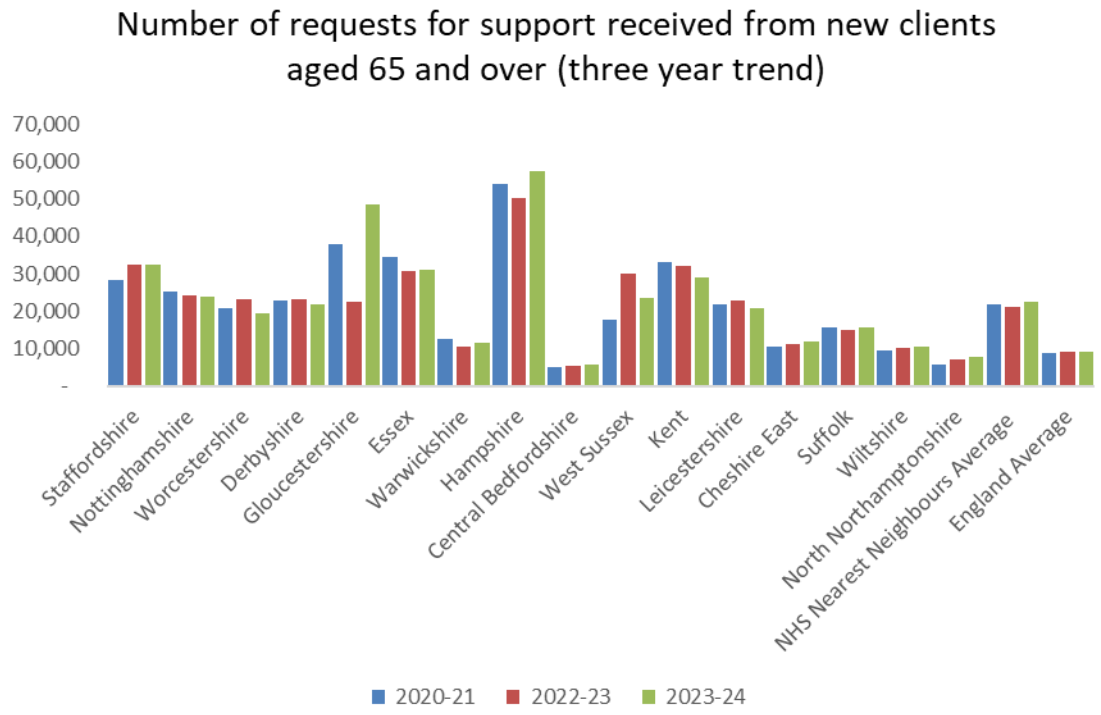
Requests for Support per 100,000 adults



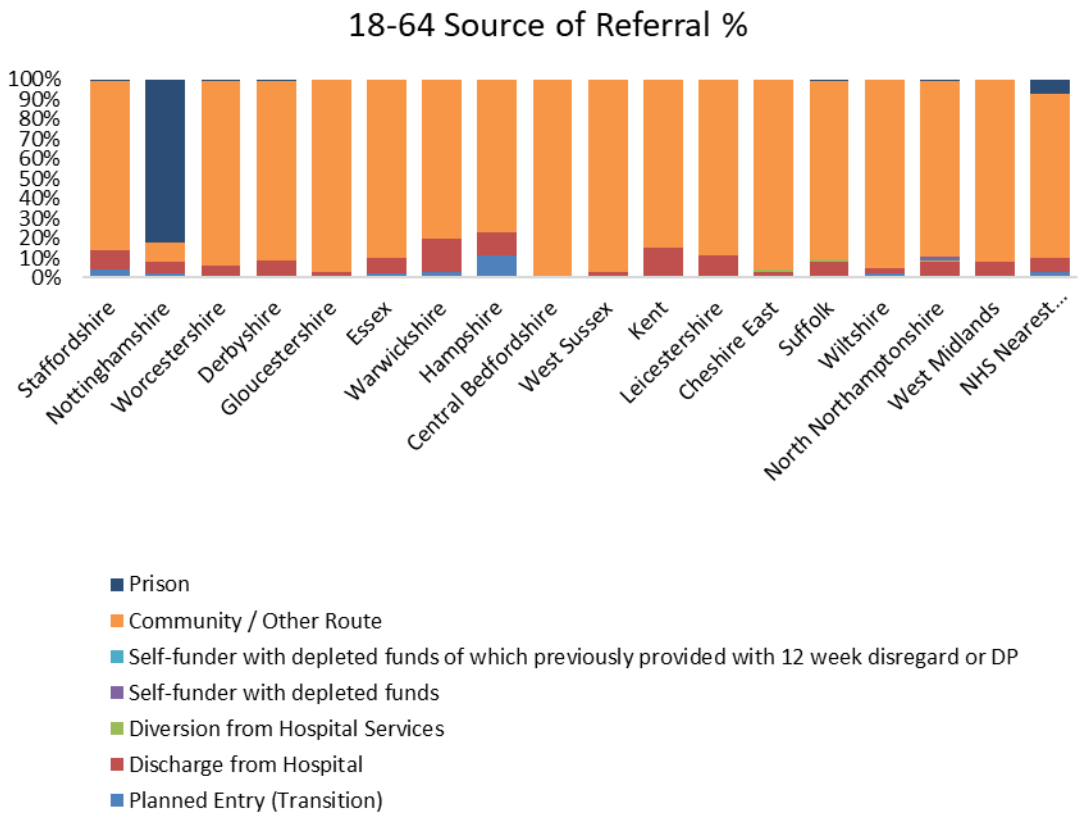


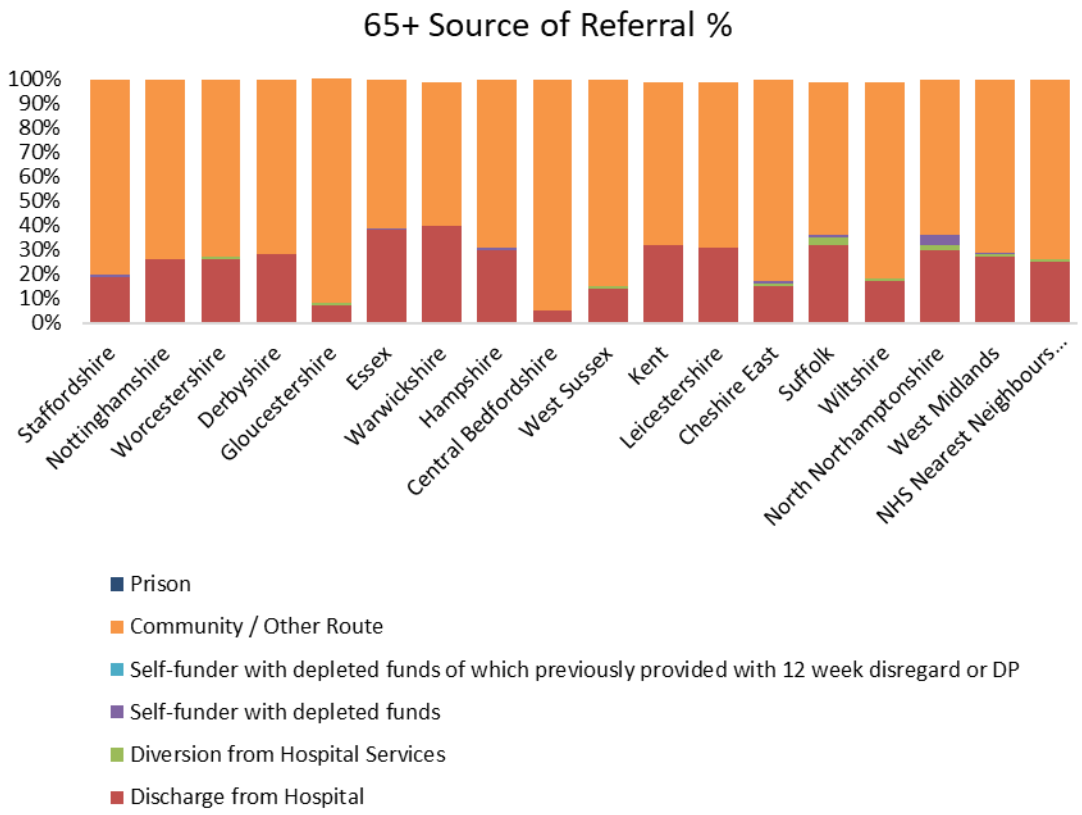
Requests for Support



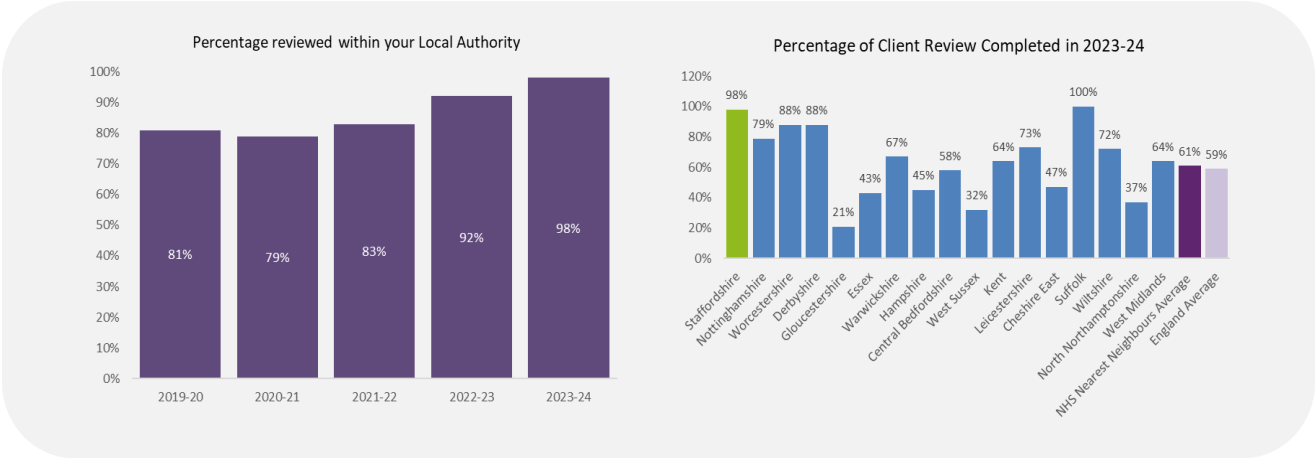


Source of referral

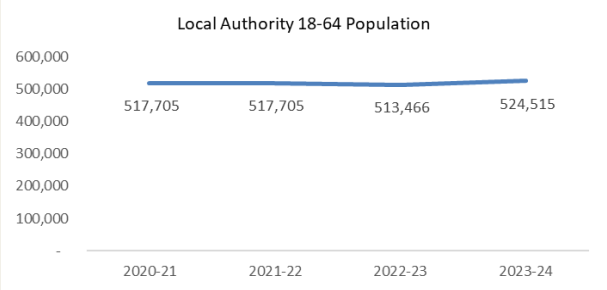


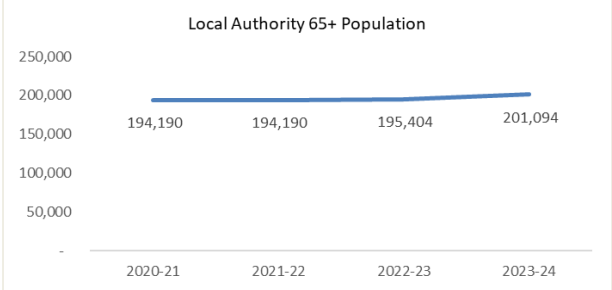


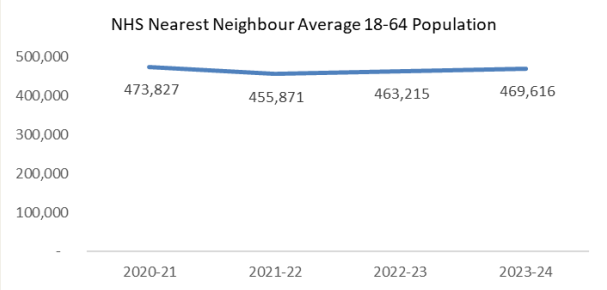
Review Effectiveness

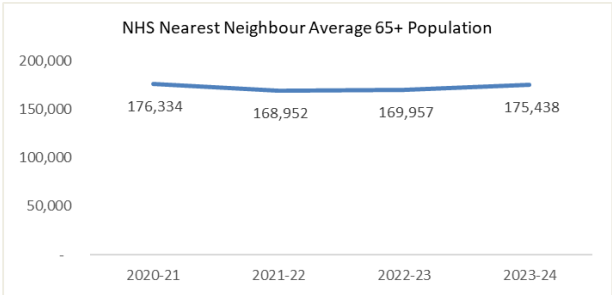


Population



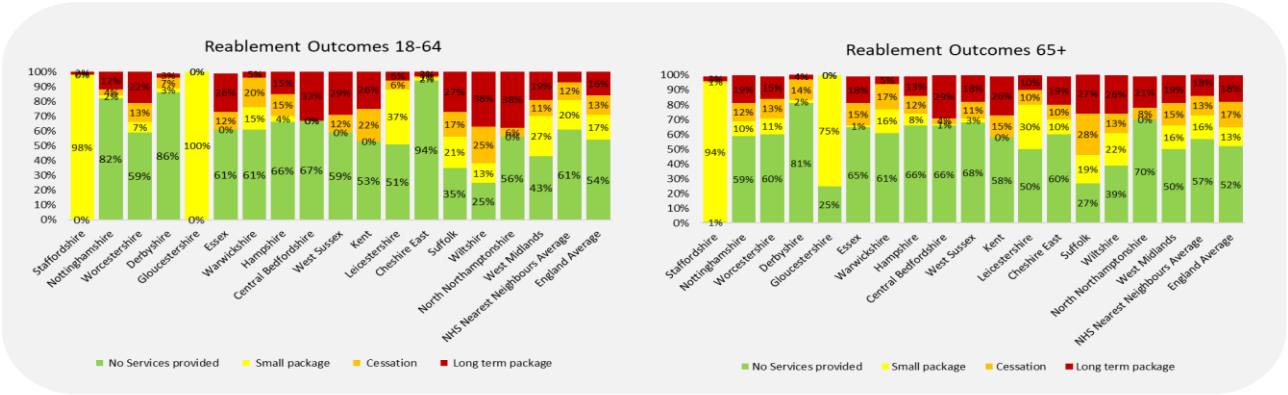






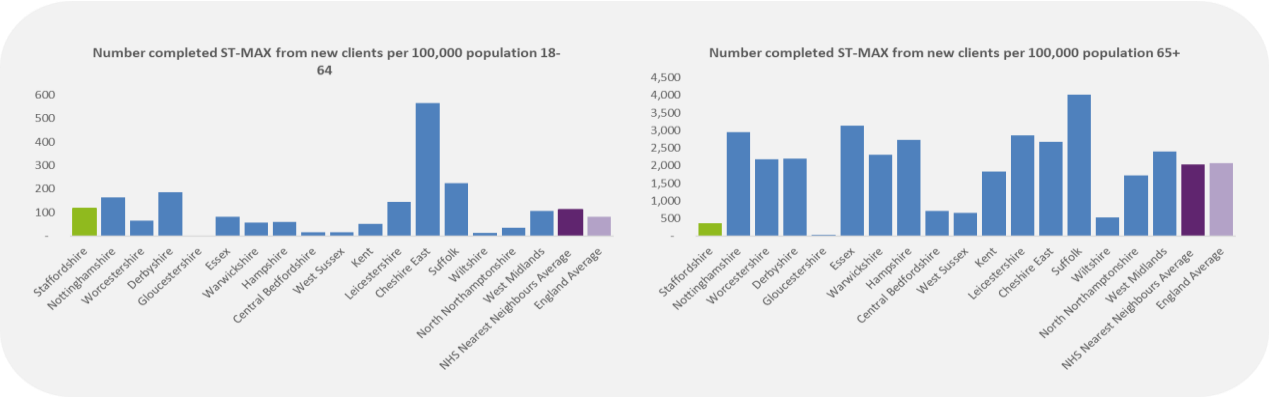
Reablement Effectiveness

Completed ST-MAX

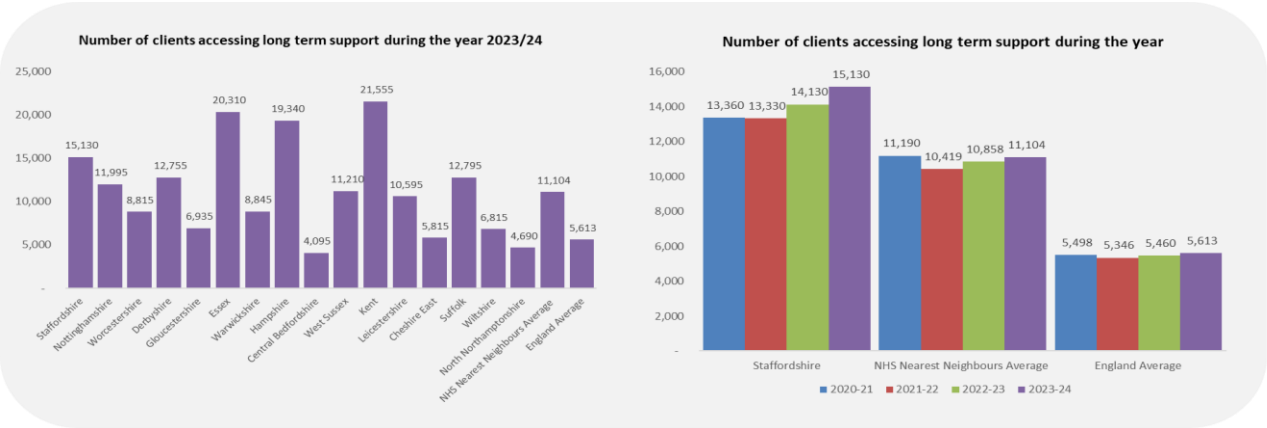


- The above would indicate an issue with Staff CC recording

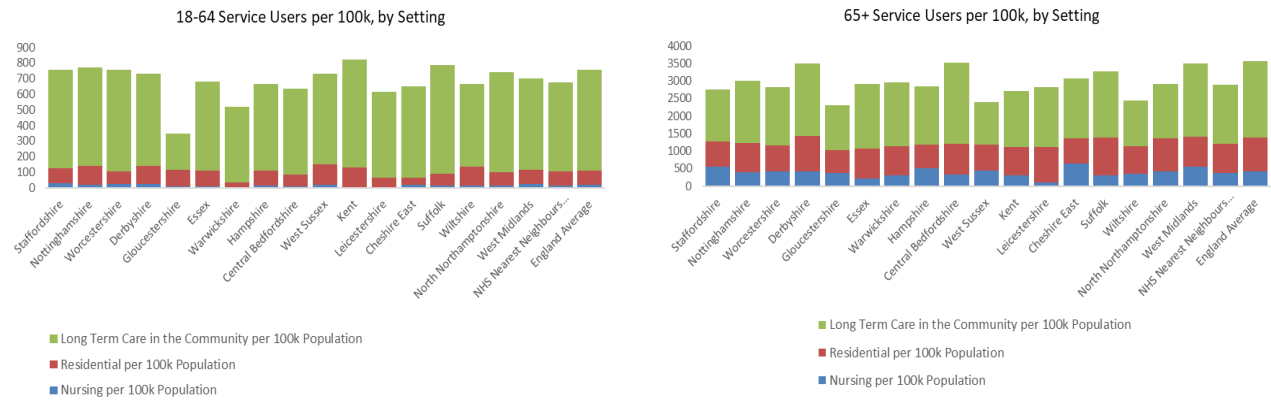
Completed ST-MAX



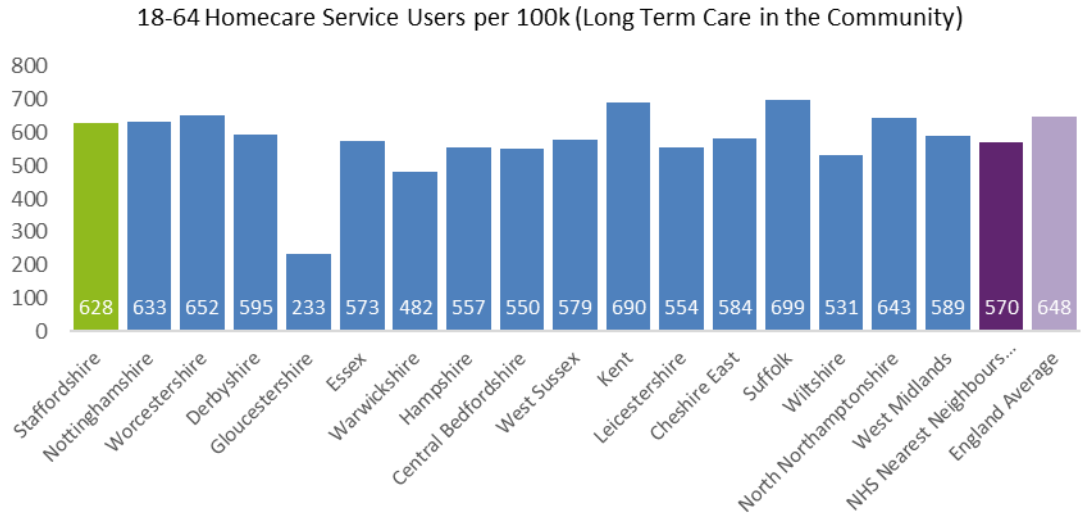
Number accessing long term support during the year

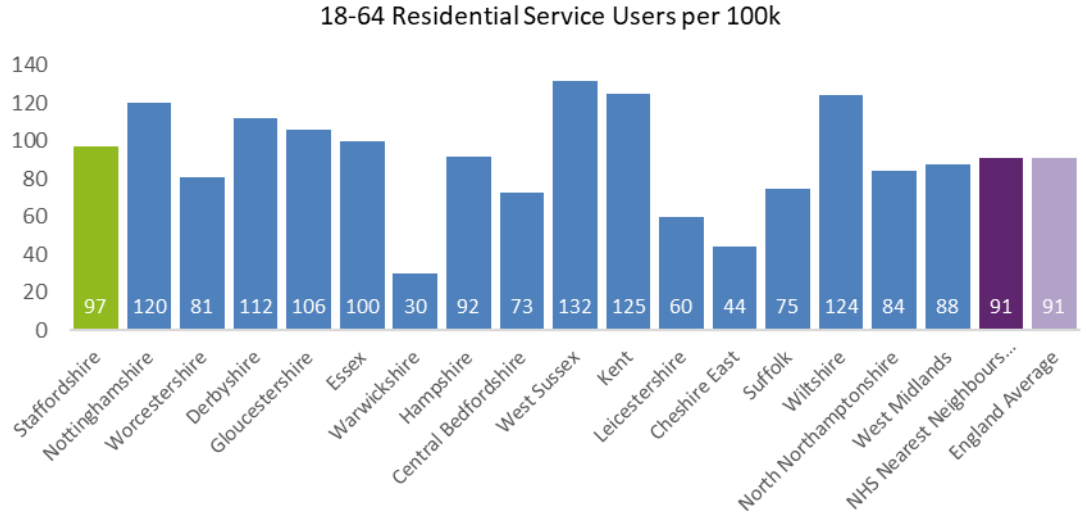


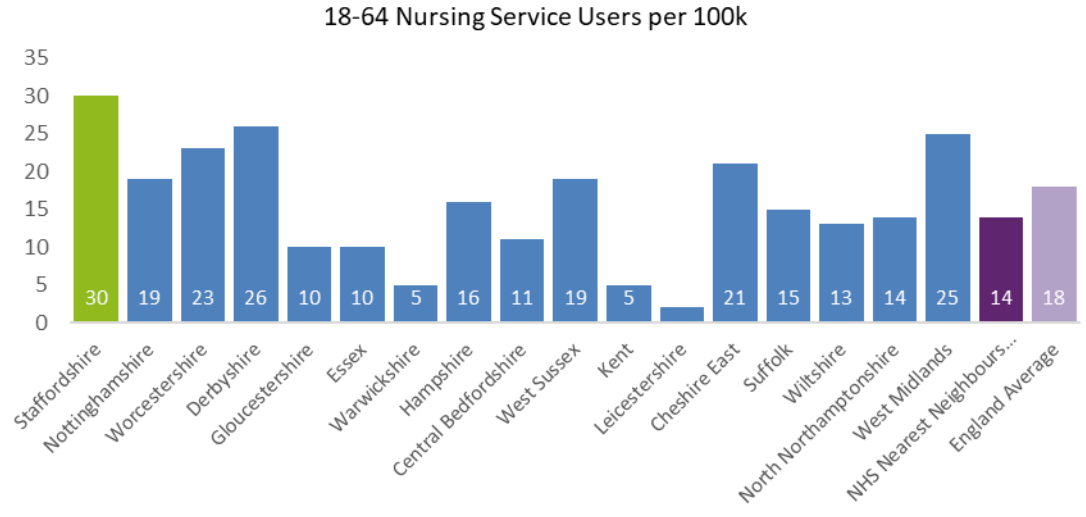
Service Users by Setting / 100k



Number of 18-64 Adults in Long Term Care / 100k

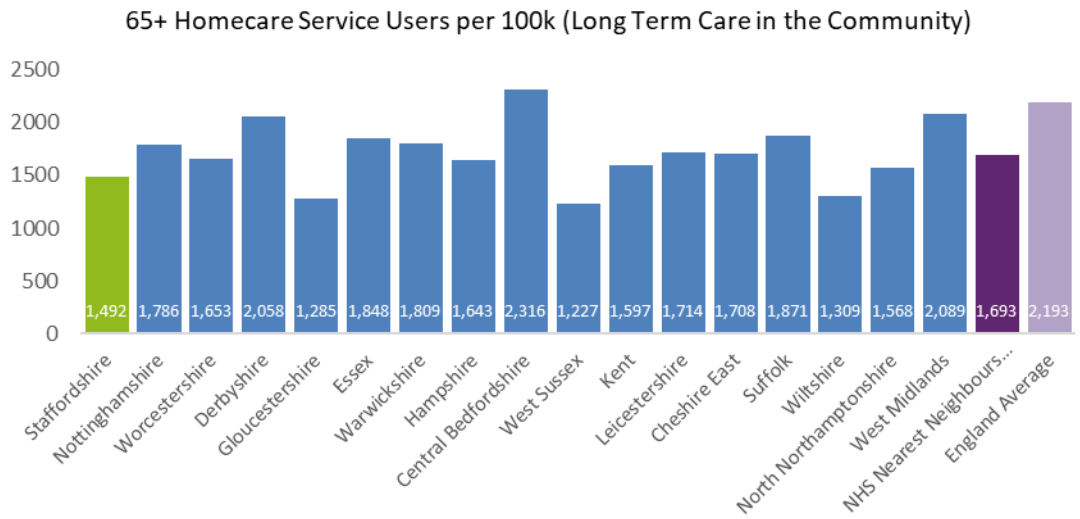


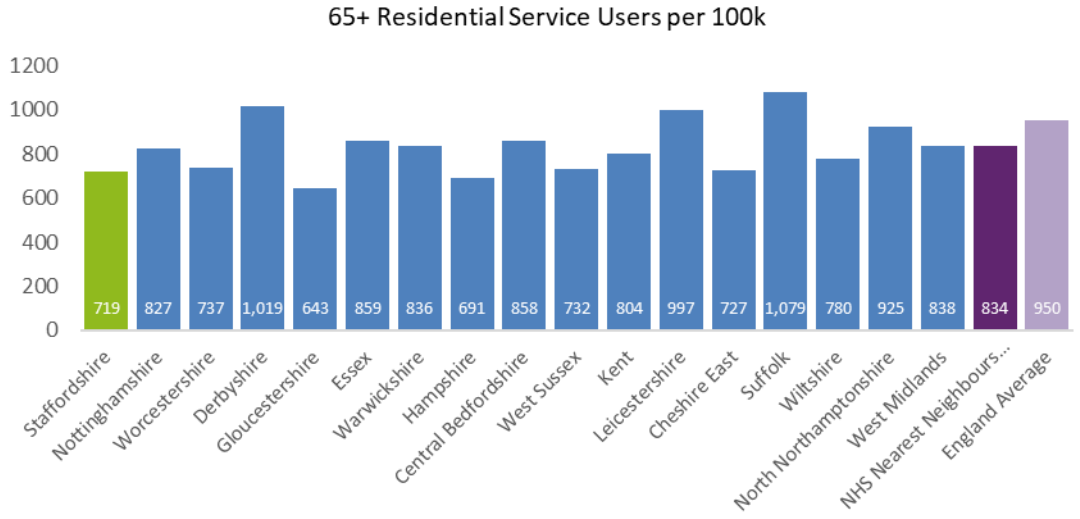


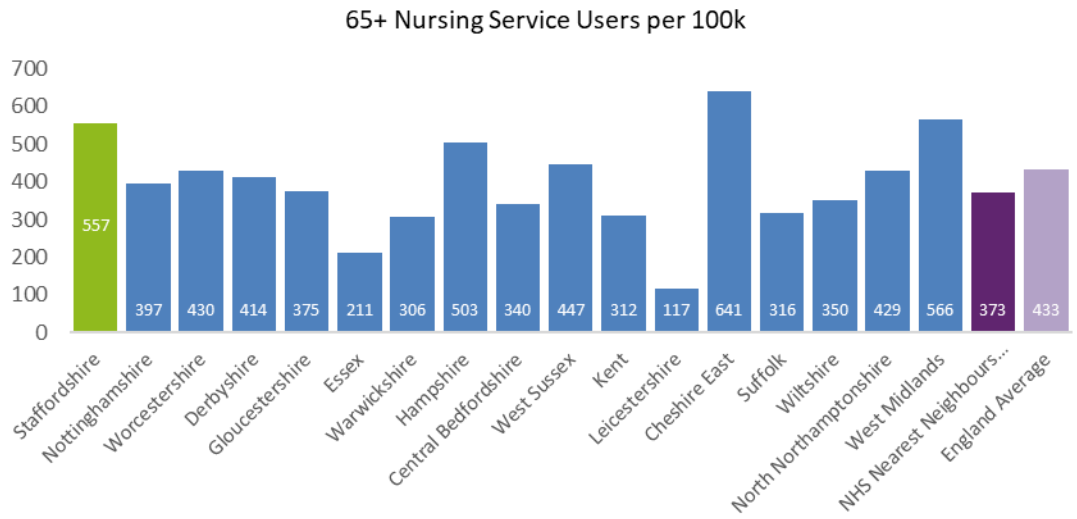


- Higher use of homecare for working age adults compared to NHS statistical neighbours which is positive.
- Whilst Residential is slightly higher the use of nursing is higher, indicating too much of a dependency on bed based care

Number of 65+ Adults in Long Term Care / 100k





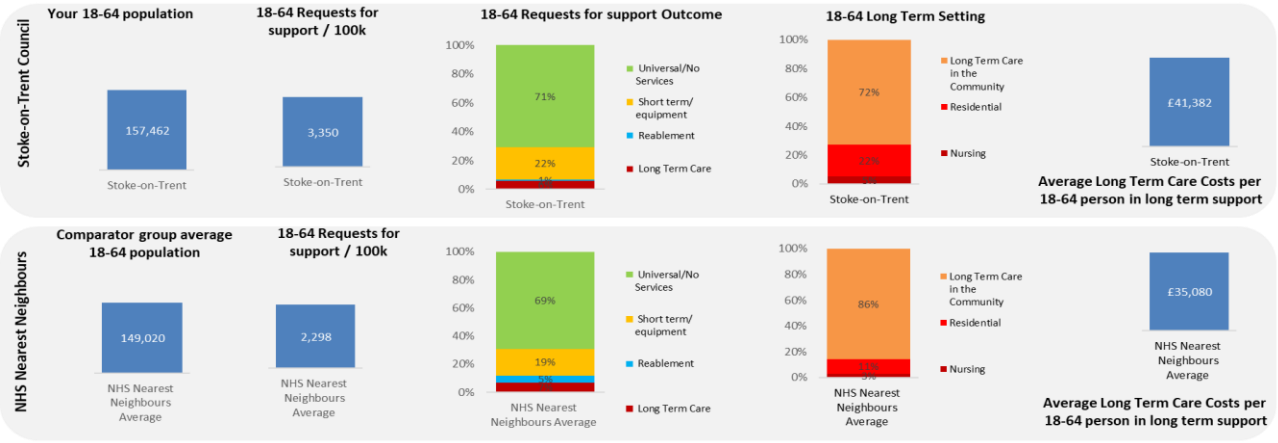


- Lower use of homecare for older age adults compared to statistical neighbours and whilst use of residential is lower the use of nursing is much higher than NHS statistical neighbours.

Adult social care – Stoke-on-Trent

How does your system manage demand?

Working age adults (18-64)

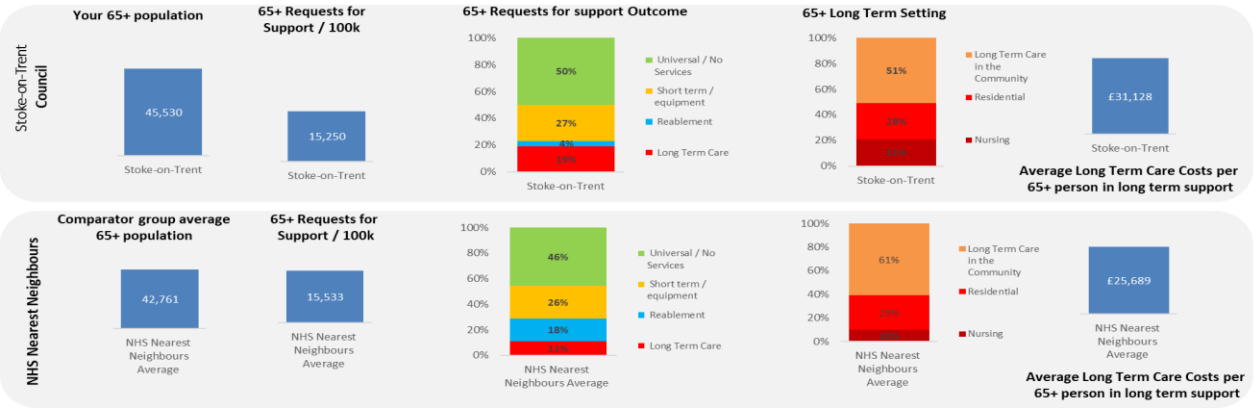


- Requests for support per 100k are above SNs.
- Average expenditure on long term care for working age adults is considerably above NHS SNs.

86

How does your system manage demand?

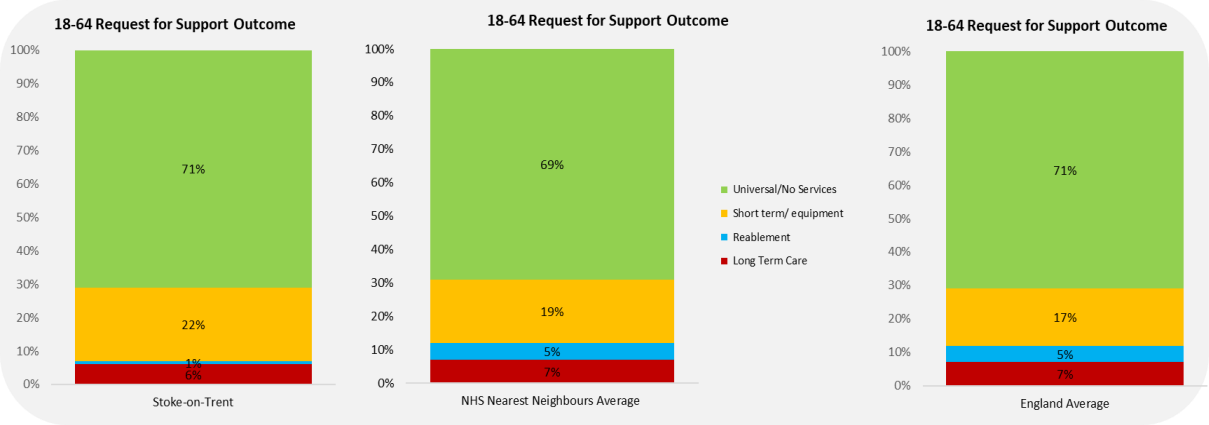
Older adults (65+)



- Requests for support are in line with SNs.
- Average expenditure on Older adults again is well above NHS SNs.

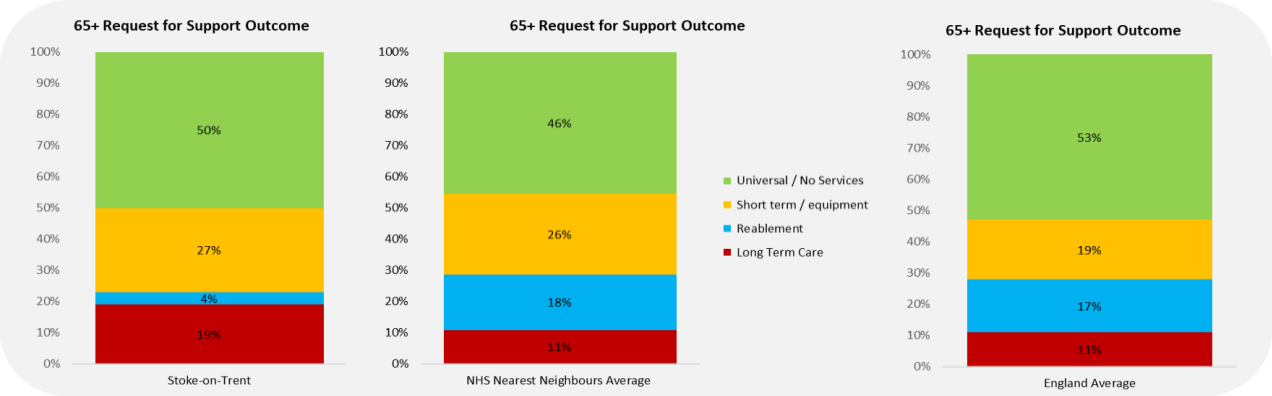
87

Assessment Outcome for 18-64



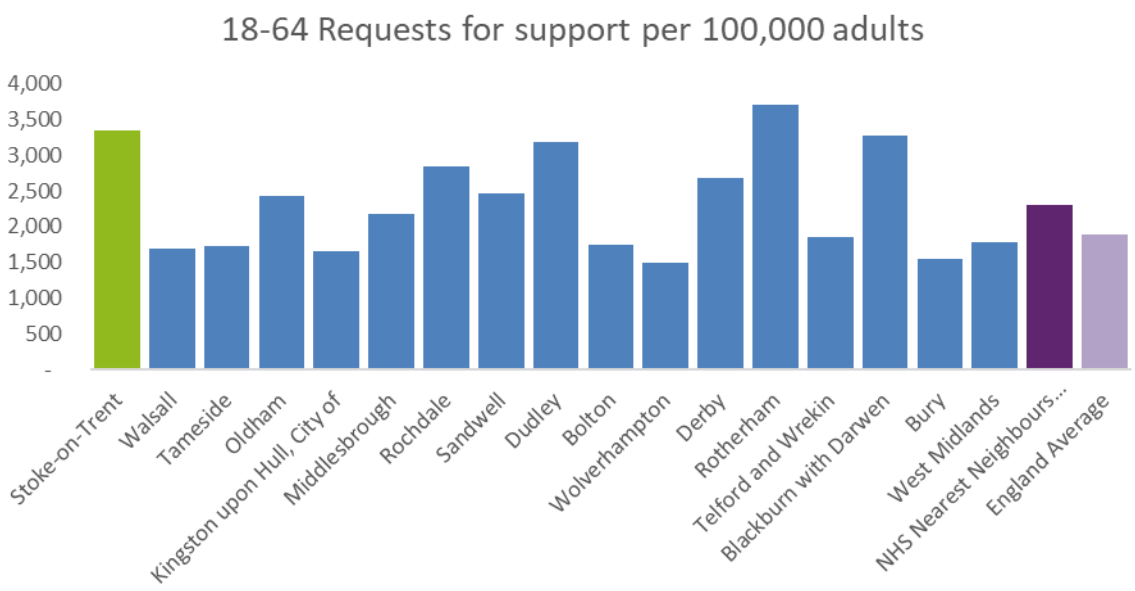
Percentages may not total 100% due to return in some categories of <5 not counted in total figures

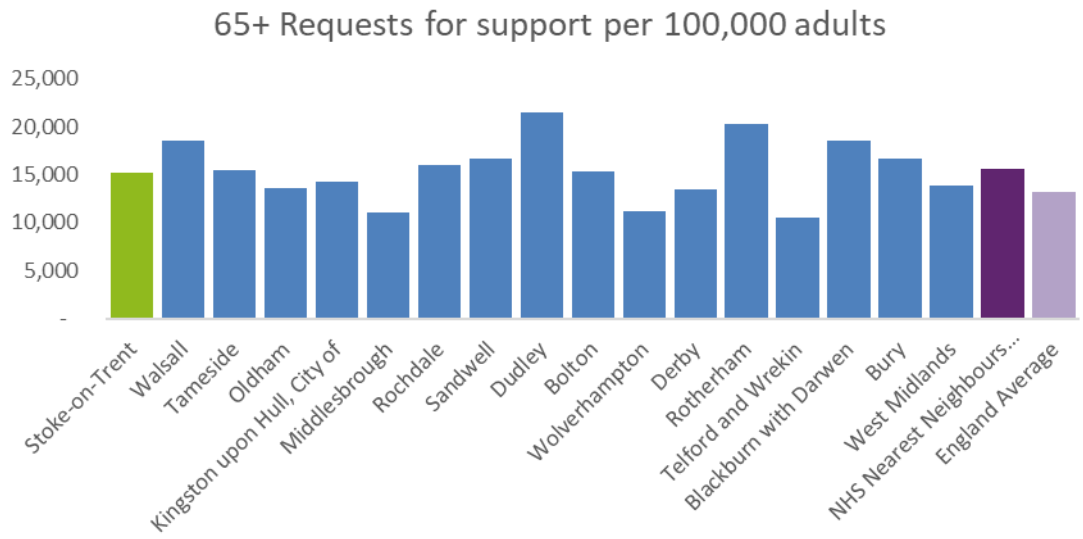
Assessment Outcome for 65+



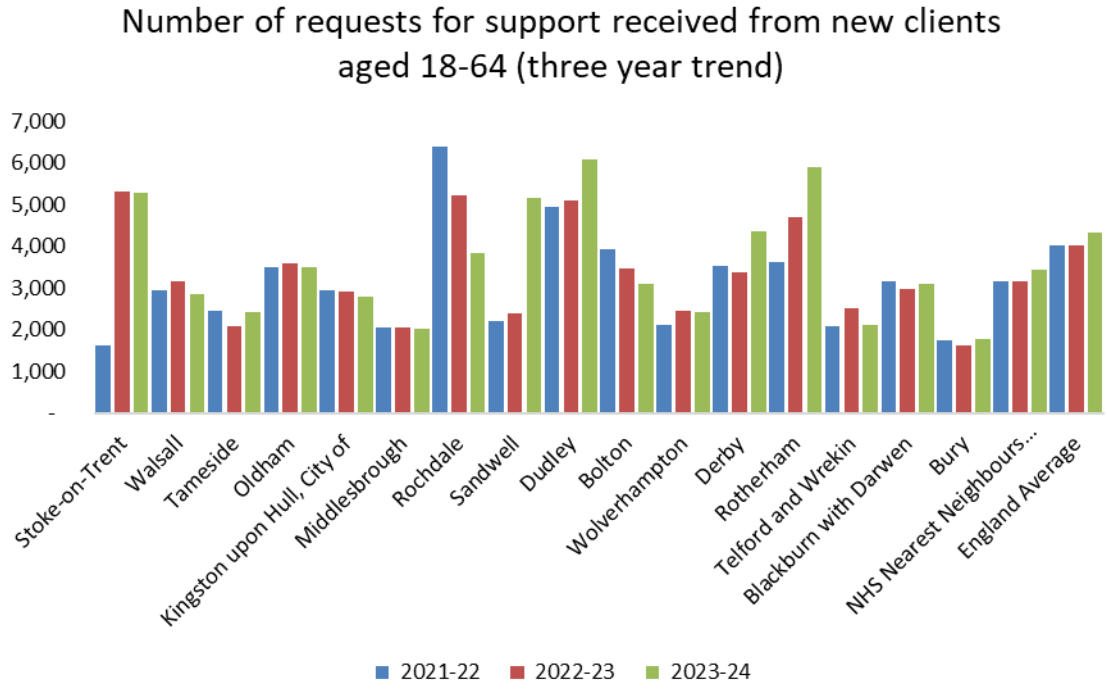
Percentages may not total 100% due to return in some categories of <5 not counted in total figures

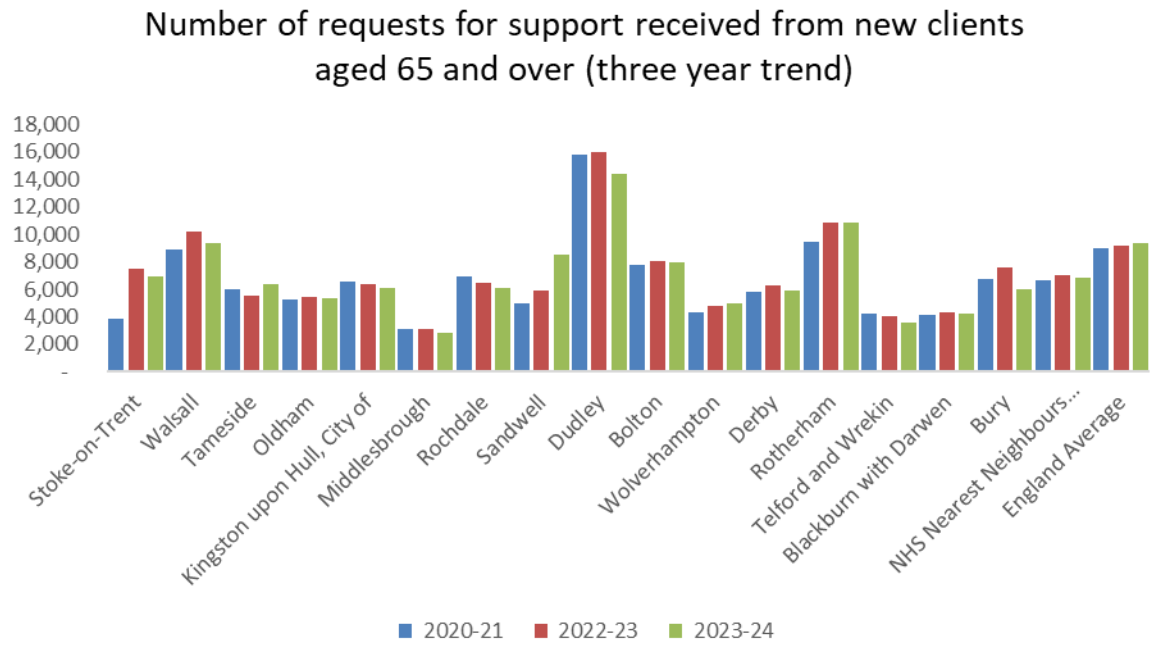
Requests for Support per 100,000 adults



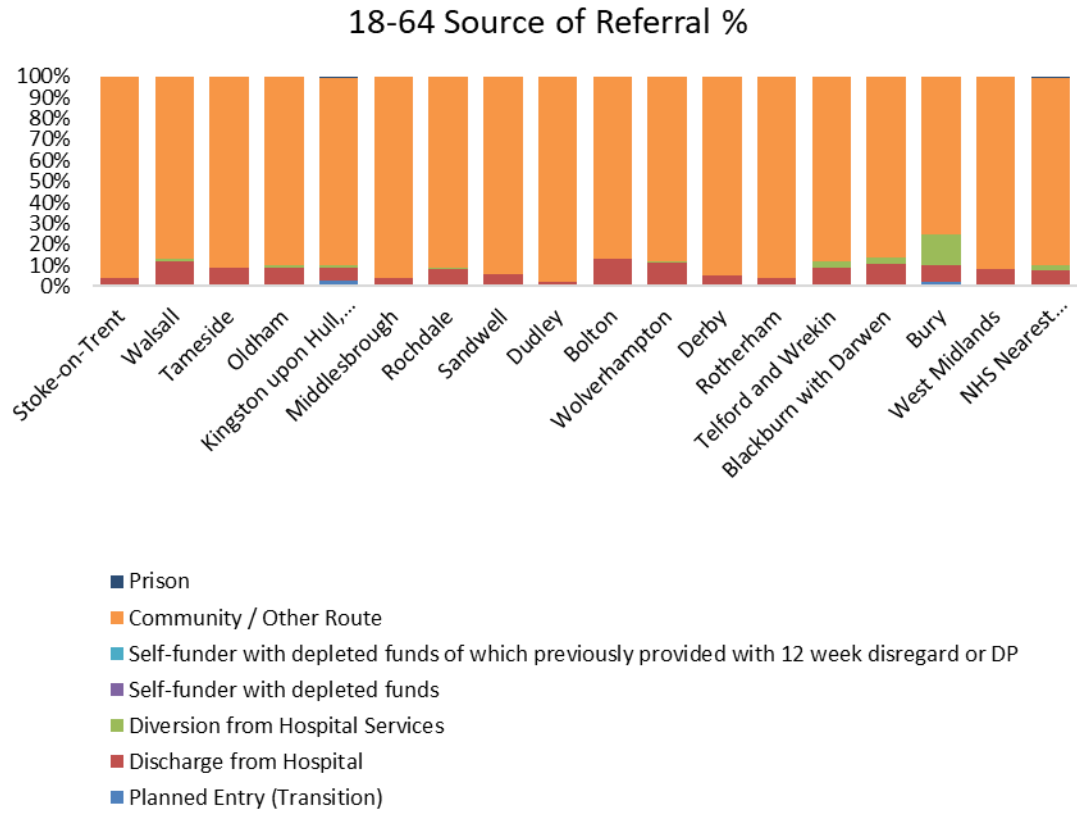


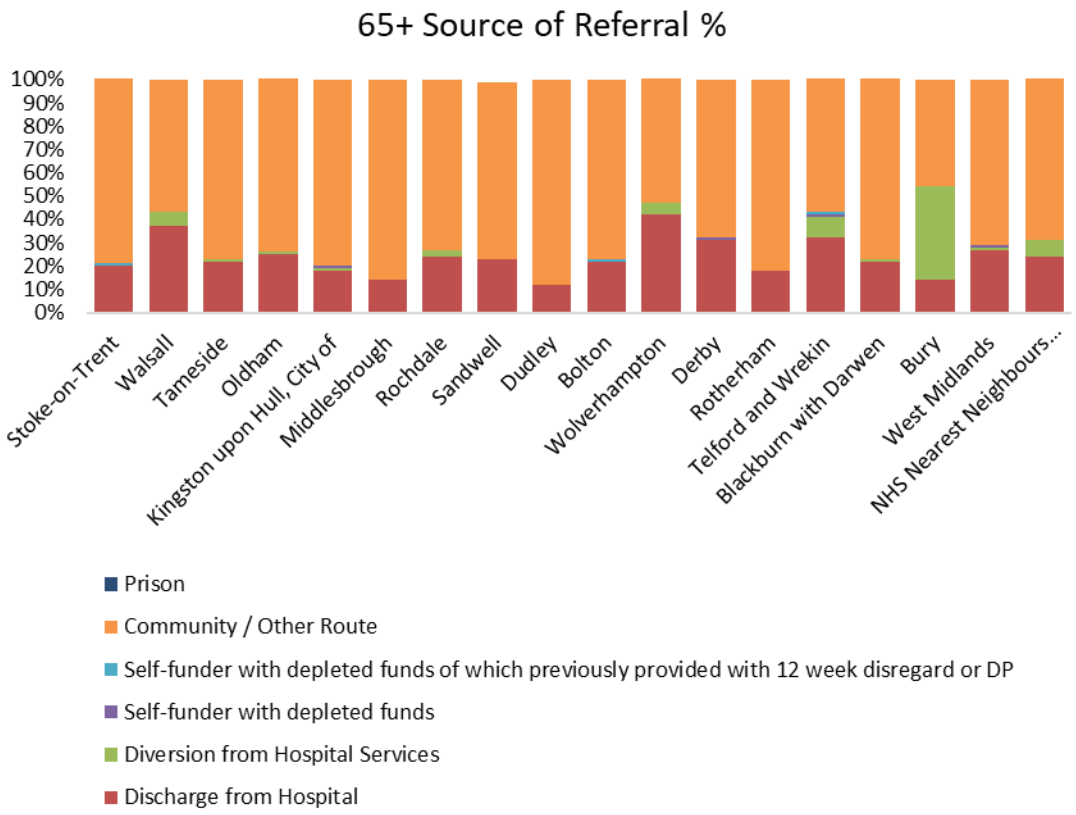
Requests for Support



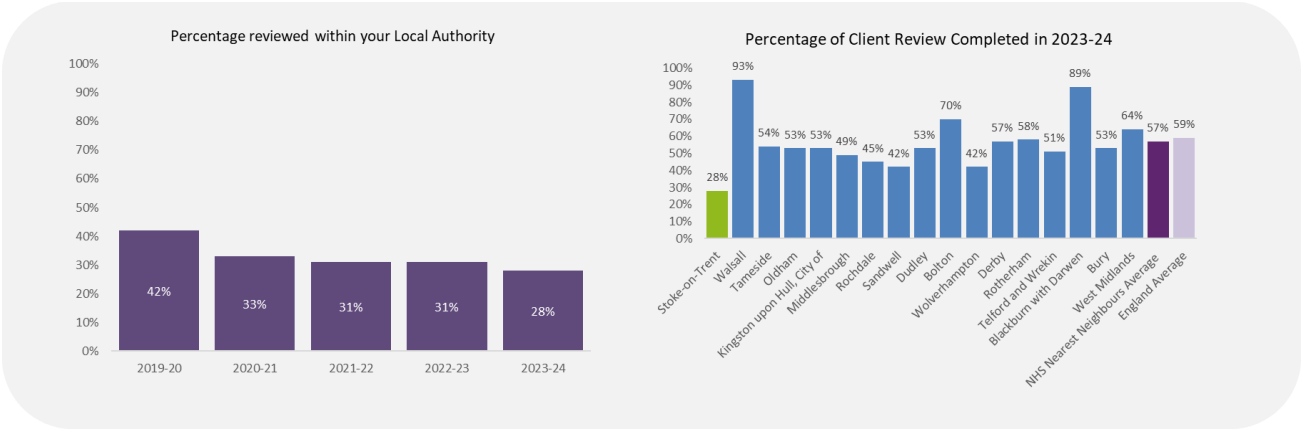


Source of referral

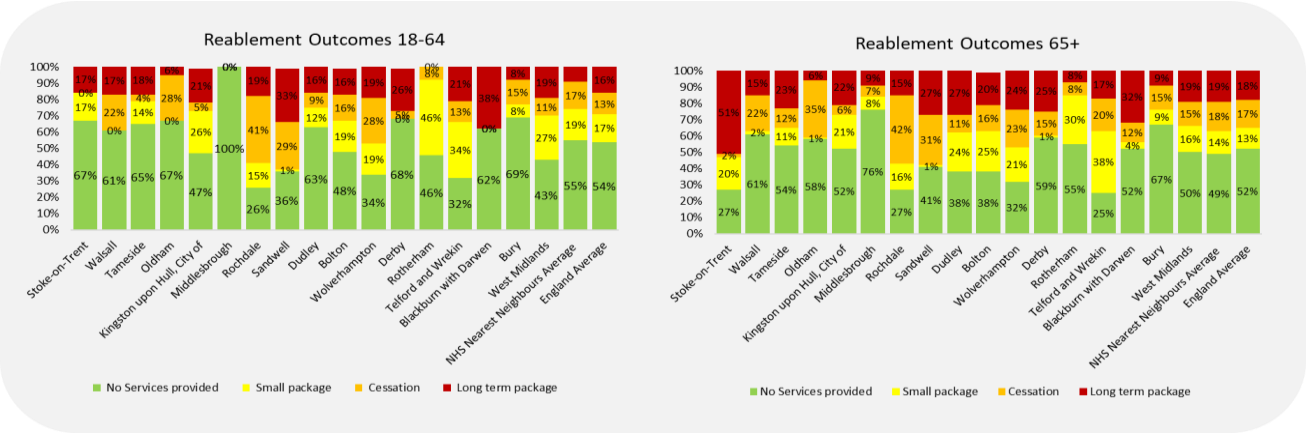




Review Effectiveness



Reablement Effectiveness



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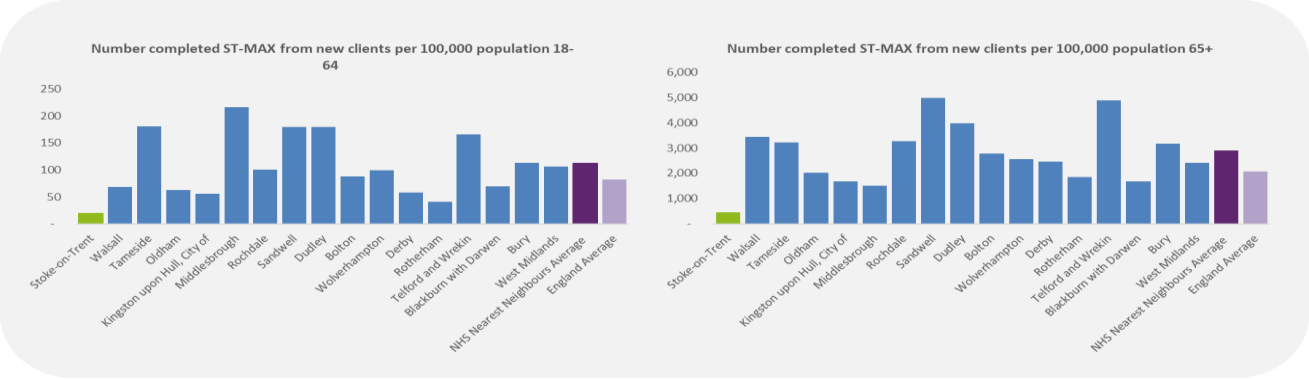
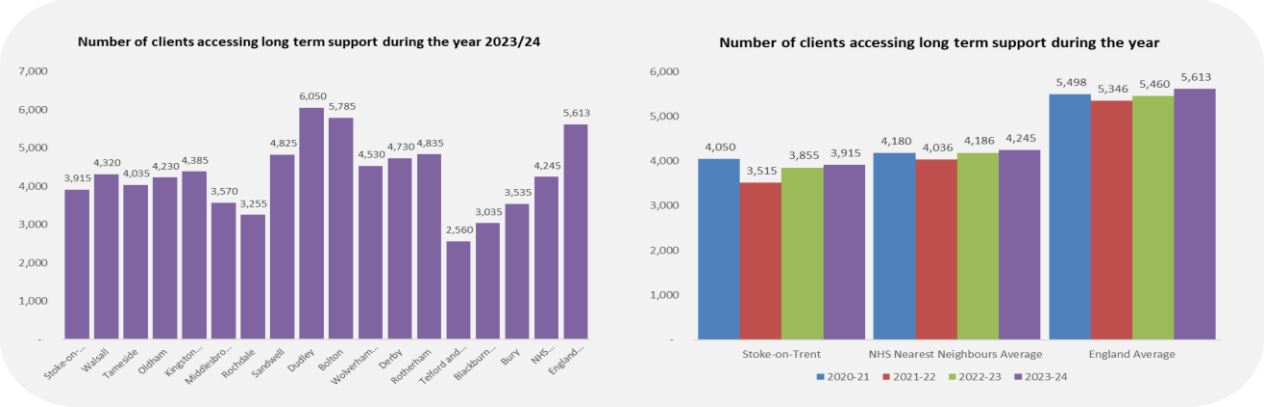
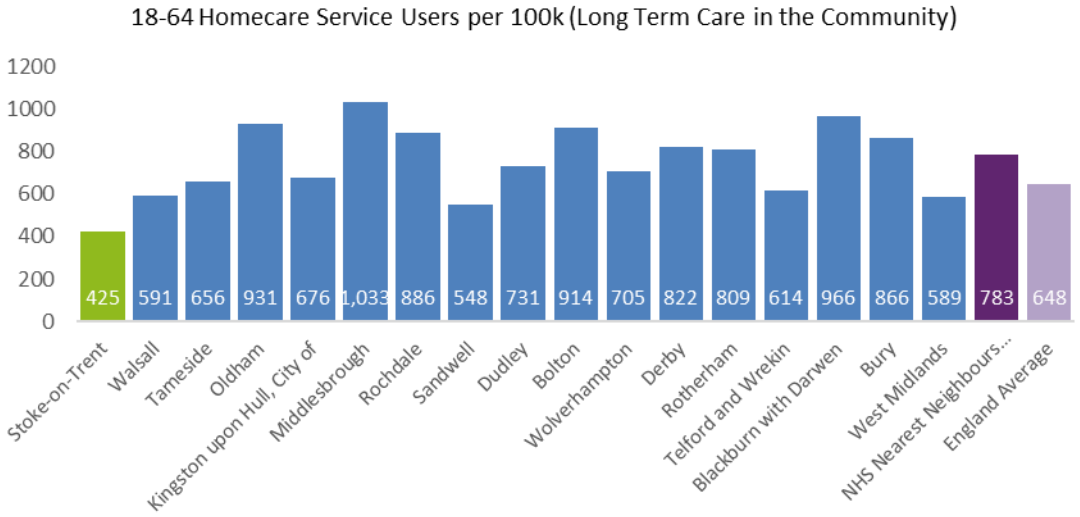
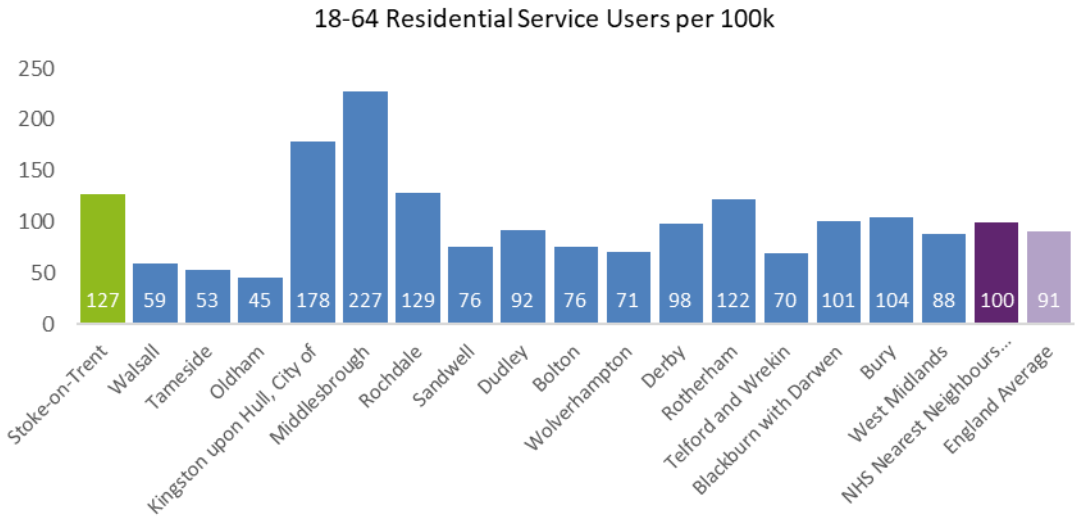


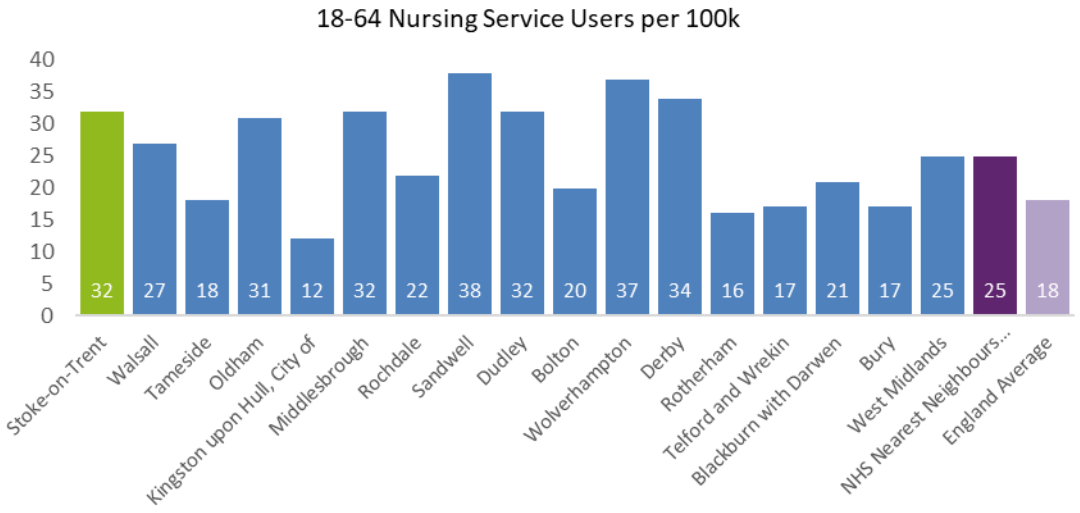
Number accessing long term support during the year



Number of 18-64 Adults in Long Term Care / 100k

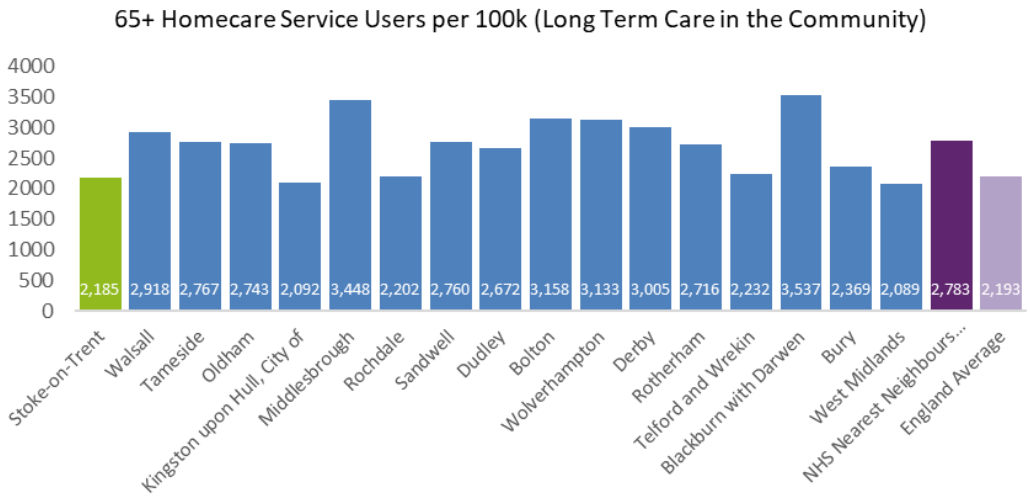


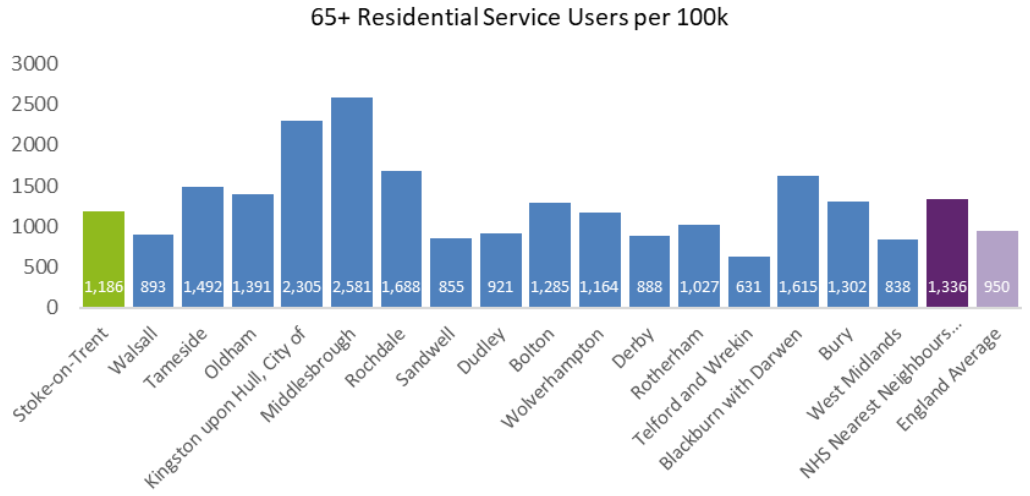


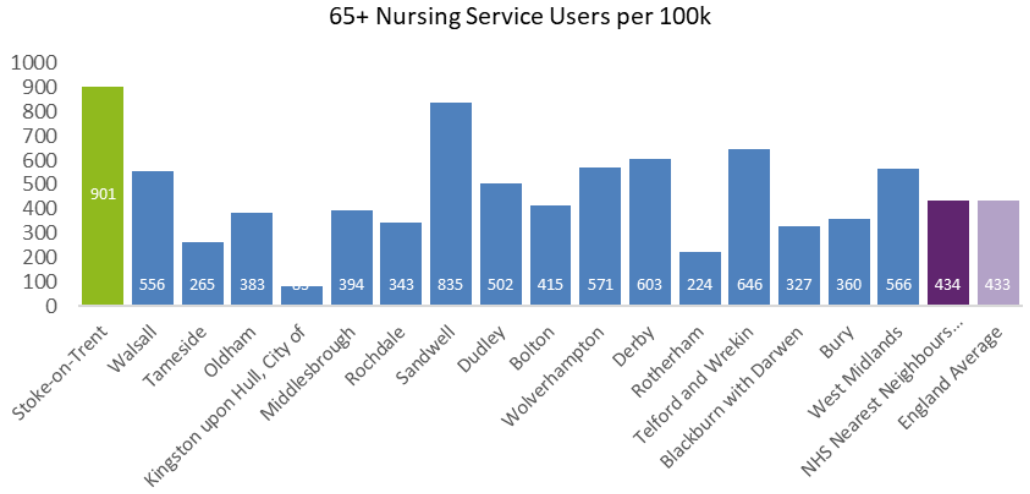


- Use of bed based care for WAA is above NHS statistical neighbours and use of homecare below, which will be reflected in the higher long term care costs.

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 explicity 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 Plan - Newcastle-Und

Appendix 1 - Interim Plan 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= 2025[34].

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

13. References

[1] https://www.gov.uk/government/publications/local-government-reorganisation-letter-to-areas-invited-to-submitted-final-proposals/summary-of-the-local-government-reorganisation-process
[2] https://dclgapps.communities.gov.uk/imd/iod_index.html

[3] https://www.ons.gov.uk/census/maps/choropleth/population/household-deprivation/hh-deprivation/household-is-not-deprived-in-any-dimension
[4] https://assets.nationalrail.co.uk/e8xgegruud3g/6U7I9lkpxPPkHQR8s8EYuj/e3fccc7b40a84b026bfa9e5a668af7f5/National_Rail_network_map_June_2024_v40b.pdf
[5] https://www.ons.gov.uk/census/maps/choropleth/work/distance-travelled-to-work/workplace-travel-4a/works-mainly-from-home?lad=E07000195
[6] https://www.cannockchasedc.gov.uk/sites/default/files/document-library/Cannock%20Chase%20Local%20Plan%20Main%20Modifications%20Track%20change%20version.pdf
[7] https://www.lgcplus.com/politics/lgc-briefing/lgr-offers-a-fresh-start-for-surrey-28-10-2025/
[8] https://www.gov.uk/government/publications/housing-delivery-test-2023-measurement
[9] https://fingertips.phe.org.uk/profile/public-health-outcomes-framework#:~:text=The%20Public%20Health%20Outcomes%20Framework,health%20of%20the%20poorest%20fastest
[10] https://explore-education-statistics.service.gov.uk/
[11] https://www.lgcplus.com/politics/governance-and-structure/tony-travers-fair-funding-could-let-reform-cut-tax-15-09-2025/
[12] https://www.gov.uk/government/consultations/the-fair-funding-review-20
[13] https://www.gov.uk/government/statistics/local-authority-revenue-expenditure-and-financing-england-2025-to-2026-budget-individual-local-authority-data
[14] https://assets.publishing.service.gov.uk/media/68527345f2b86c081cfdb352/SG_2025-26.ods
[15] https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/wardlevelmidyearpopulationestimatesexperimental
[16] https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionsforengland/2022based#projected-change-by-local-authority
[17] https://www.gov.uk/government/statistics/statutory-homelessness-in-england-financial-year-2023-24
[18] https://www.gov.uk/government/statistics/council-taxbase-2024-in-england
[19] https://www.gov.uk/government/statistics/council-taxbase-2021-in-england
[20] https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019
[21] https://www.gov.uk/government/statistics/council-tax-levels-set-by-local-authorities-in-england-2025-to-2026
[22] https://www.gov.uk/government/statistical-data-sets/live-tables-on-council-tax
[23] https://obr.uk/forecasts-in-depth/the-economy-forecast/inflation/#CPI
[24] https://www.gov.uk/government/statistical-data-sets/live-tables-on-local-government-finance
[25] Budget books and statements of accounts for each existing authority:
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