

Our ref: GM/Cor15/2603a

Your ref:

Date: 26<sup>th</sup> March 2026



LGR Consultation  
Fry Building 2NE  
Ministry of Housing, Communities and Local Government  
2 Marsham Street  
London  
SW1P 4DF

Via email only: [lgrconsultationresponse@communities.gov.uk](mailto:lgrconsultationresponse@communities.gov.uk)

Dear Sirs,

Newcastle-under-Lyme Borough Council is responding to the proposal for **four unitary authorities for Staffordshire and Stoke-on-Trent**, as submitted by the Council in November 2025, following cross-party agreement at its full Council meeting of 19<sup>th</sup> November 2025. For the avoidance of doubt, the Council does not support the alternative proposals for Staffordshire and Stoke-on-Trent currently being consulted upon.

Newcastle-under-Lyme Borough Council is located in the county of Staffordshire, with the upper tier authority being Staffordshire County Council. The Borough was established by royal charter in 1173, and celebrated its 850<sup>th</sup> anniversary in 2023.

As set out in its Interim Plan of March 2025, and submission in November 2025, the Council's Administration has made clear its strong objection to the principle of Local Government Reorganisation in Staffordshire and Stoke-on-Trent, and that the safeguarding of local decision-making, civic traditions and accountability best lies at the existing district and borough level. It has, however, worked productively to develop a submission that, should LGR proceed, will provide a balanced, credible delivery mechanism for communities, close to local need, whilst recognising both the long history of boundaries and geographies in our region, and the wishes of other authorities around new unitary areas.

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

Strongly agree. The creation of four unitary authorities reflects the geography of each of the four proposed authorities, recognising that Staffordshire borders with its expansive geography, some of our communities naturally look to other places – from Mow Cop with its spilt conurbation between Newcastle and Cheshire East, to Madeley at the border with rural

Shropshire and the Westlands bordering Stafford, with Wolstanton and May Bank bordering our neighbours in Stoke-on-Trent, our well-connected place can and should look to have a cohesion with not one geography but exploit and maximise each and every one of its economic links.

*2. To what extent do you agree or disagree that the proposed councils will be able to deliver the outcomes they describe in the proposal?*

Strongly agree. The proposal sets out a credible and achievable vision for improved service delivery. Newcastle-under-Lyme's strong financial management, advanced Local Plan, and proven track record in delivering high-quality services provide a solid foundation for transition to unitary status. The model supports more responsive, locally focused decision-making.

*3. To what extent do you agree or disagree that the proposed councils are the right size to be efficient, improve capacity and withstand financial shocks?*

Strongly agree. The proposed unitary councils are of a scale that balances efficiency with local accountability. They are large enough to achieve economies of scale yet small enough to remain connected to their communities. Financial modelling indicates that each unitary would be sustainable and resilient, avoiding the risks associated with creating overly large or financially unstable authorities. The proposal highlights opportunities for increased economies of scale for shared service functions where these make sense, such as IT, data, support functions and procurement, whilst providing individual accountability.

Whilst we firmly support the principle that areas with the greatest need and significant challenges need a funding formula which works in their interests, and that this must be reflected in settlements in the future, this should not in our firm opinion be viewed through the lens of 'one area pays for another'. Residents rightly expect that their funding of local government through council tax, non-domestic rates for the companies they run and work for and through general taxation can clearly be linked to quality service provision at a local level.

In our consideration of options, we are mindful that residents should not be asked to unreasonably contribute to delivery which is distant and disjointed from their localities. If a unitary model is to be imposed, it must be on the basis of a geography which balances advantaged and disadvantaged areas and continues to deliver the very highest possible level of services, locally. This is separate to the equally important goal of using the levers of power, individually and collectively as authorities, to increase wealth creation and retention across our region.

4. *To what extent do you agree or disagree that this proposal will put local government in the area as a whole on a firmer footing, particularly given that some councils in the area are in receipt of exceptional financial support?*

Agree. There remains a risk that areas such as Newcastle would become a lesser priority in a larger unitary council which incorporates Stoke-on-Trent, given the financial pressures on the City Council. The proposal avoids the significant financial risks associated with merging stable councils with those currently reliant on exceptional financial support. By allowing Stoke-on-Trent and Staffordshire Moorlands to merge while enabling other areas to form financially sound unitaries, the model strengthens the overall system without compromising the stability of well-managed authorities.

However, it should be noted that one of the key asks of Government within the proposal, that if LGR proceeds it should be fully funded by Government, reflects that LGR will bring significant, and not yet fully known, costs for local government for many years to come. This will necessarily impact on new authorities' financial health and spending power across several MTFS cycles.

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

Agree. The model supports sustainable service delivery through a combination of local responsiveness and opportunities for shared services where appropriate. Newcastle-under-Lyme's existing strengths in planning, regeneration, culture, waste management and neighbourhood delivery would be preserved and enhanced within a unitary structure. 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 smart systems and processes to maximise efficiency. This is separate to the manageable geography of a council area, but must be built into future service design.

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

Strongly agree. The proposal reflects extensive engagement with local communities. Residents in Newcastle-under-Lyme have consistently expressed concerns about being subsumed into a

larger North Staffordshire authority. The four-unitary model respects these views and ensures that local needs remain central to governance arrangements. The proposal sets out a clear ambition and vision for the highest quality service delivery to residents, visitors and businesses.

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

Strongly agree. The proposed structure is explicitly designed to support meaningful devolution within a Staffordshire and Stoke-on-Trent Strategic Authority. Smaller, focused unitaries will be better positioned to contribute effectively to regional strategies in transport, skills, and economic development, ensuring that devolution delivers meaningful benefits, building on a strong foundation of partnership working with universities, colleges, public sector anchor institutions and businesses.

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

By maintaining strong local identities and ensuring governance remains close to residents, the proposal enhances democratic accountability. The model avoids creating distant, centralised authorities and instead supports meaningful engagement through councils that understand their communities' priorities. If LGR is to proceed, the establishment of genuine local democracy through the establishment and enhancement of town and parish councils will be required to enable local delivery and maintain the heritage and civic traditions of our towns, villages and rural places. These should be carefully considered to ensure that such councils:

- Avoid artificial structures to fill gaps where these are not responsive to locally identified geographies;
- Ensure that parish and town councils have the powers and capacity they need to be self-sustaining and not be dependent upon higher tier authorities for funding for service delivery;
- Do not place undue burdens on residents through precepts which have to fill gaps in provision left by the abolition of district and borough councils.

*9. If you would like to, please use the free text box to explain the answers you have provided to questions 1-8 referring to the question numbers as part of your answer.*

*You may also use the box to provide any other comments you have on the proposal.*

This four-unitary proposal is pragmatic, evidence-based, and sensitive to local identity. It provides a balanced approach that supports financial sustainability, democratic accountability, and effective devolution. Crucially, it protects Newcastle-under-Lyme from being drawn into a financially unstable North Staffordshire model while still contributing to a coherent and functional regional governance structure. Whilst it is recognised that no decisions on areas already

determined by the Secretary of State set a precedent, the proposal for four unitary councils in Staffordshire and Stoke-on-Trent aligns well with areas such as Suffolk and Norfolk, where smaller unitary authorities demonstrate a close link to local geography and community.

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

The proposed four-unitary model does not require boundary changes and makes no consequent changes to delivery public and voluntary services which are co-terminus with existing boundaries (such as Staffordshire Police, Staffordshire Fire & Rescue Service and Support Staffordshire). Other anchor institutions, such as universities and colleges, will continue to be supported by their local authorities. We will work with the expanded ICB infrastructure and any changes to Policing to ensure that the strong partnerships in place, particularly through the Newcastle Partnership Board, are maintained.

If you have any questions in respect of the above, please do not hesitate to contact me.

Yours faithfully,

Gordon Mole MIED

**Chief Executive**

**Newcastle-under-Lyme Borough Council**

**Contacting the Council:** Telephone 01782 717717  
E-mail [customerservices@newcastle-staffs.gov.uk](mailto:customerservices@newcastle-staffs.gov.uk) • [www.newcastle-staffs.gov.uk](http://www.newcastle-staffs.gov.uk)

