

Appendix A

Local Government Reorganisation – Consultation Response on behalf of the Cabinet Executive Blaby District Council

1. Response relating to Leicester City Council proposal

For reference this is [Leicester City Council's](#) proposal.

Question 1

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

Blaby District Council **strongly disagrees** that Leicester City Council's proposal fully meets the Government's criteria for councils based on sensible and balanced geographies.

The proposal depends on the expansion of Leicester City's boundaries into neighbouring districts, yet Leicester City Council's own evidence does not establish that these areas form a single functional economic geography. Travel to work data in their submission shows concentrated commuter patterns only in specific boundary edge neighbourhoods, not across wider districts. The communities affected have established economic and social connections across Leicestershire rather than with the City, and the proposal does not demonstrate that boundary expansion would improve economic coherence or outcomes.

The proposal reshapes boundaries to address constraints within the city rather than to reflect functional economic areas across Leicester, Leicestershire and Rutland as a whole. Physical contiguity alone does not equate to economic coherence, and the evidence presented does not demonstrate that the proposed expanded geography would function as a single, integrated economic area.

The proposal is primarily driven by Leicester City's previous financial uncertainties rather than by functional geography. Now Leicester City have received an improved settlement, they have confirmed this pressure is no longer relevant. Economic growth,

infrastructure and housing delivery operate at a strategic scale and do not require the redrawing of city boundaries. The proposal risks disrupting established local relationships without delivering corresponding economic benefit.

Their proposal is also driven by the perceived boundary constraints around housing and economic growth. The new Spatial Development Strategies will see growth dealt with via the LLR footprint as opposed to the existing council boundaries negating the need for boundary extensions to address this point. In addition, the housing numbers for the city have reduced significantly in the revised NPPF again negating the need for boundary change to address this issue. The creation of the Foundation Strategic Authorities will ensure issues are dealt with across a wider geography and in a cohesive way including transport infrastructure and the skills agenda.

We believe that a sensible geography should respect local identity, including resident views, reflect real economic areas and provide clarity and long-term stability. Ignoring established identities and economic linkages increases the risk of disengagement and weakens long-term governance stability. For these reasons, we do not believe the proposal creates sensible or functional geographies.

Question 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?

Blaby District Council **strongly disagrees** that Leicester City Council's preferred proposal provides sufficient confidence that the outcomes described can be delivered.

Leicester City Council's submission highlights substantial financial pressures, high level of deprivation and limited development capacity within the current boundary.

These issues form the core justification for the proposal, yet they also demonstrate the fragility of the starting position. The plan relies heavily on new capacity, new land and new revenue streams but the submission does not demonstrate convincingly that the city can improve service sustainability simply by expanding its geography. This raises legitimate concerns about the city's ability to deliver improved outcomes across a significantly larger population.

The proposal introduces multiple delivery risks simultaneously — including geographic expansion, service integration, organisational restructuring and financial recovery — without sufficient mitigation. Rather than reducing complexity, the proposal compounds it.

Many of the areas proposed for absorption into an expanded city have different community identities, expectations and service needs. Delivering consistent service standards across such a diverse and newly assembled geography—especially one that

cuts across existing parish and district structures—adds complexity rather than reducing it.

Leicester City Council’s own evidence shows that six parish councils would be split to create the new boundary, which is a clear indicator that the proposed footprint is not naturally aligned to effective service delivery or community governance.

The proposal states that the new arrangement would unlock major efficiencies, harmonise services, and deliver long-term transformation. However, due to the complexity of the boundary extensions, these benefits rely on optimistic assumptions about:

- workforce capacity,
- ICT integration,
- contract novation,
- partner alignment, and
- rapid organisational restructuring.

The submission itself highlights the need for parallel ICT systems, dual running, and large-scale reorganisation across seven councils within a compressed timeframe. These factors materially increase delivery risk and make the achievement of the stated outcomes uncertain.

In contrast, the North, City, South (NCS) proposal:

- uses existing whole-district boundaries,
- avoids splitting parishes or communities,
- reduces the scale of disaggregation required,
- aligns more naturally with local identities, and
- provides clearer, more stable foundations for transition.

From a delivery standpoint, NCS is lower-risk, more coherent, and more achievable.

For these reasons, Blaby District Council does not have confidence that Leicester City Council can deliver the outcomes described in their proposal. From a government assurance perspective, the proposal introduces avoidable complexity and uncertainty at the point where stability and deliverability are critical.

Question 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?

Blaby District Council **strongly disagrees** that the scale proposed in Leicester City’s preferred proposal is the right size to deliver efficiency, improve capacity and withstand future financial shocks.

The proposal is driven by Leicester's specific financial pressures, not by sustainable unitary design. Their submission acknowledges that the city faces high levels of deprivation, significant service demand and a constrained tax base. However, the fair funding review has changed this position for them substantially.

The proposal assumes that increased scale will inherently improve financial resilience. However, this assumption does not sufficiently take account of Leicester City Council's current financial position which has left them financially sustainable and in a strong position for future demand, coupled with the revised approach to SEND costs. The changes to the boundary could now have the opposite effect as the movement into low areas of deprivation could see the financial position worsen.

In addition, the proposed council would be required to manage reorganisation, service integration and financial recovery simultaneously. Blaby District Council does not consider that the proposal provides sufficient assurance that the authority would have the capacity or headroom to manage this level of complexity without increasing risk to service sustainability.

Question 4

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

Blaby District Council **strongly disagrees** that Leicester City Council's preferred proposal provides a credible basis for delivering higher quality or more sustainable public services.

While the proposal identifies a number of service ambitions, it relies heavily on organisational scale and boundary expansion as the primary enablers of improvement. There is limited evidence that the proposed geography or size would directly improve service outcomes, particularly in high-demand statutory services where performance is driven by early intervention, place-based delivery and strong local partnerships rather than by the size of the administering authority. The ability of the City to deliver complex statutory services to the required standards are already under scrutiny as demonstrated by both Ofsted and Care Quality Commission.

The Council is concerned that the proposal does not sufficiently demonstrate how services would be redesigned to reflect the very different needs of urban, suburban and more rural communities within the expanded authority. Communities proposed for absorption would bear the risk of service integration without clear evidence of corresponding benefit. The proposal is City centric and does not adequately address the unitary around the edge of the city and how it would meet the needs of its communities and how services would be delivered around a 'ring like' geography.

In addition, the proposal does not adequately address the operational risk associated with integrating complex services while managing existing demand and financial pressures. Evidence from local government reorganisation elsewhere shows that service transformation benefits are neither immediate nor guaranteed and are highly dependent on leadership capacity and organisational stability. The proposal does not provide sufficient assurance that these conditions would be met.

Sustainable public services require stability, local accountability and services designed around communities. Blaby District Council does not consider that Leicester City Council's preferred proposal demonstrates how these conditions would be strengthened and therefore does not agree that it would deliver high quality, sustainable public services.

Question 5

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

Blaby District Council **strongly disagrees** that Leicester City Council's preferred proposal has been sufficiently informed by local views or that it reflects the needs of the communities affected.

The consultation activity underpinning the City Council's proposal was limited in scope and uneven in its geographic reach, with significantly less emphasis placed on engaging communities outside the existing city boundary who would be directly affected by the proposed expansion. While the proposal references engagement activity, it does not demonstrate how feedback from non-City communities has materially influenced either the preferred geography or the overall design of the proposal.

Engagement does not equate to endorsement, and awareness does not imply consent. The findings from the North, City, South reinforce this point clearly. When residents across Leicester, Leicestershire and Rutland were asked about potential boundary expansion, 86% expressed a preference for only a limited approach. Open text responses reflected even stronger concerns: 40% of the 2,155 submissions opposed any form of boundary expansion. In fact, across qualitative and quantitative methods, the evidence demonstrated widespread resistance to the expansion, yet there is little indication that this strong opposition has been meaningfully reflected in the City Council's proposal. The North, City, South proposal was informed by a comprehensive programme of engagement across Leicester, Leicestershire and Rutland, including targeted engagement with residents, stakeholders and partners in areas most affected by potential reorganisation. This engagement explicitly tested views on geography, scale, identity and governance, and the results show a clear and consistent preference for solutions that avoid boundary expansion and respect existing communities and identities.

Blaby District Council considers this contrast to be significant. Where the City Council's proposal appears to treat consultation as a validation exercise for a predetermined outcome, the North, City, South engagement was used to shape and refine the proposal itself, including the rejection of options involving city boundary expansion due to the strength of public opposition.

Proceeding with a proposal that remains contested by affected communities risks embedding opposition into the new governance arrangements and undermines long-term public trust.

Question 6

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

Blaby District Council **strongly disagrees** that Leicester City Council's preferred proposal would support or accelerate devolution arrangements.

Blaby District Council is concerned that the proposal risks undermining, rather than enabling, devolution by introducing contested boundary changes that lack local support. The absence of consent from affected communities and neighbouring authorities would weaken the legitimacy of any future devolution arrangements and risk diverting leadership and organisational capacity away from developing robust strategic governance at the Leicester, Leicestershire and Rutland level.

Contentious boundary change risks delaying the establishment of effective strategic governance at precisely the point Government is seeking momentum on devolution.

In addition, two unitary authorities sitting under a Strategic Authority does not reflect best practice in terms of a balance of power, as opposed to a three unitary solution, such as NCS, which would enable more cohesive and a better governance structure to ensure the best outcomes for our communities.

In contrast, evidence from across Leicester, Leicestershire and Rutland demonstrates that devolution can be pursued through stable and broadly supported local government structures. The North, City, South proposal explicitly separates the question of local government reorganisation from strategic devolution, enabling councils to focus collectively on the establishment of effective devolution arrangements without delay or disruption.

Successful devolution depends on balanced and willing partners, not dominance by a single authority. Leicester City Council's preferred proposal does not demonstrate how boundary expansion would advance these objectives.

Question 7

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

Blaby District Council **strongly disagrees** that Leicester City Council's preferred proposal would enable stronger community engagement or provide meaningful opportunities for neighbourhood empowerment.

While the proposal makes reference to existing neighbourhood and ward-based arrangements within the City, it does not set out a clear or enhanced model of neighbourhood partnerships as part of the proposed reorganisation. In particular, there is no evidence of delegated decision-making, neighbourhood-level budgets, or formal mechanisms through which communities would be able to shape priorities and influence outcomes within a significantly larger authority.

Blaby District Council is concerned that the proposal relies on extending existing City-focused neighbourhood arrangements without demonstrating how these would be adapted to reflect the distinct identities, governance traditions and service needs of communities outside the current city boundary. Neighbourhood models designed for a dense urban context are not readily transferable to more rural or mixed communities.

Neighbourhood empowerment is most effective where councils operate at a scale that supports subsidiarity rather than centralisation. In practice, the proposed scale and geography would increase the distance between communities and decision-makers, weakening local influence rather than strengthening it.

Blaby District Council therefore does not consider that Leicester City Council's preferred proposal would strengthen community engagement or deliver meaningful neighbourhood empowerment.

Question 8

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

The additional commentary is detailed in the answers to the questions above.

Question 9

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

Blaby District Council **strongly disagrees** that Leicester City Council's preferred proposal sets out a strong or compelling public services and financial sustainability justification for boundary change.

While the proposal highlights significant financial pressures, high levels of deprivation and limited development capacity within the City's current boundary, it does not demonstrate that boundary expansion would materially or sustainably improve the City's financial position. The assumption that access to additional land would translate into net financial benefit is not supported by evidence. New development brings substantial and ongoing service and infrastructure costs, and these often outweigh additional council tax and business rate income, particularly in the medium term.

Blaby District Council is concerned that the proposal treats boundary change as a mechanism for redistributing resources rather than addressing the underlying drivers of financial pressure. Demand-led statutory services, which account for the majority of financial risk, are driven by socio-economic need and national funding arrangements, neither of which are resolved by altering administrative boundaries. Boundary expansion therefore risks extending existing pressures across a wider area without reducing overall system risk.

The evidence base across Leicester, Leicestershire and Rutland demonstrates that Leicester City Council's financial sustainability can be achieved without boundary change. Recent and anticipated government funding changes, alongside a stronger focus on prevention and early intervention to reduce demand for high-cost services, provide a more credible and proportionate route to long-term sustainability than structural expansion.

In relation to public services, the proposal does not show that boundary change is necessary to improve integration or outcomes. Existing partnership and strategic planning arrangements already enable cross-boundary working where required, without the disruption, cost and complexity associated with boundary reorganisation. The proposal also lacks a robust assessment of the impact of boundary change on wider public services and system partners.

Blaby District Council's view is that boundary change should only be pursued where it is clearly necessary, proportionate and supported by compelling evidence that it will secure sustainable public services and long-term financial resilience. Leicester City

Council's preferred proposal does not meet this threshold and therefore does not provide a strong justification for boundary change.

Question 10

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

The narrative is contained above in question 9.

2. Response relating to Leicestershire County Council's proposal

For reference this is [Leicestershire County Council's](#) proposal.

Question 1

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

Blaby District Council **strongly disagrees** the County Council's proposal fully meets the Government's criteria for councils based on sensible and balanced geographies.

While the proposed geography broadly reflects the historic county of Leicestershire and Rutland, and aligns with some existing service and partnership footprints, the resulting population size would be significantly larger than that of Leicester City as a standalone unitary authority. This creates a clear imbalance between neighbouring councils that the Government has indicated it wishes to avoid when considering local government reorganisation.

Blaby District Council is particularly concerned that this imbalance would become more pronounced over time. Local government structures across Leicester, Leicestershire and Rutland have broadly been in place for around 50 years, and any new arrangements should therefore be capable of accommodating future population growth and demographic change without requiring further structural reform. The County proposal would absorb the majority of future housing and population growth into an authority that is already substantially larger than the City, increasing the risk that the structure becomes unwieldy and less effective over the longer term.

This imbalance risks concentrating strategic power and complexity in a single authority while leaving Leicester City comparatively small, which does not reflect a coherent or proportionate system of local government across Leicester, Leicestershire and Rutland.

In addition, the proposal brings together a wide range of communities—rural, semi-rural and small urban—into a single authority without sufficient differentiation of economic

geography or local identity. While the geography may appear administratively tidy, it does not fully reflect distinct functional economic areas or provide the balanced structure envisaged by the Government.

Blaby District Council's view is that a more balanced geography—such as that proposed through the North, City, South model—better meets the Government's criteria by creating councils of more comparable size, reflecting functional economic areas and maintaining a clearer balance across the region.

Question 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?

Blaby District Council **strongly disagrees** that the County Council's proposal provides sufficient confidence that the outcomes described can be delivered in practice.

The proposal relies on the creation of a single, very large authority responsible for all upper- and lower-tier functions across Leicestershire and Rutland. Delivering the outcomes described would require the successful integration of complex statutory services alongside district-level functions such as housing, planning, environmental services, community safety and local economic development. The scale and pace of change required presents significant execution risk, particularly given existing demand pressures in county-led services.

Blaby District Council is concerned that, in practice, organisational focus and financial capacity would be drawn toward high-cost, demand-led statutory services such as adult social care, children's services and SEND. These services already dominate county-level budgets and carry the greatest financial risk. There is a clear risk that district-level services—many of which play a critical preventative role—would receive less strategic priority and investment over time, undermining the proposal's stated ambitions around prevention, place-based working and long-term demand reduction.

The proposal also lacks sufficiently developed neighbourhood-level delivery mechanisms. While it refers to local engagement and place-based approaches, it does not establish formal neighbourhood partnerships or delegated local decision-making structures. This weakens confidence that outcomes dependent on local responsiveness and early intervention can be delivered consistently across a large and diverse geography.

Taken together, these factors suggest that the outcomes described are aspirational rather than assured. By contrast, the North, City, South model provides a more balanced framework in which strategic services and local delivery are more closely aligned, increasing the likelihood that stated outcomes can be realised in practice.

For these reasons, Blaby District Council does not have confidence that the County Council's proposal will deliver the outcomes it describes.

Question 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?

Blaby District Council **strongly disagrees** that the County Council's proposal creates councils of the right size to deliver efficiency, build capacity or withstand financial shocks in a sustainable and proportionate way.

While the proposal argues that a single large authority would benefit from economies of scale, it also concentrates all high-risk, demand-led statutory services—including adult social care, children's services and SEND—within one organisation. These services are the primary drivers of financial volatility in local government and concentrating them within a single authority increases exposure to financial shocks rather than mitigating it.

The proposal also requires extensive disaggregation of existing district services, followed by large-scale re-integration into a single system. This creates operational complexity, increases dependency on centralised systems, and reduces flexibility to respond quickly to service or financial pressures. Evidence from local government reorganisation indicates that such complexity can undermine resilience, particularly during periods of demand growth or funding change.

Blaby District Council is further concerned that the proposal redistributes risk rather than reducing it. While the integration of Rutland may strengthen resilience for Rutland itself, it introduces additional financial and service risk into an already very large and diverse authority. This risk is compounded by the wide geographic span and varied community needs that the proposed authority would be required to manage through a single political and managerial structure.

By contrast, the North, City, South model creates authorities that are large enough to achieve efficiency and resilience but sufficiently balanced to distribute financial and service risk more effectively. This reduces the likelihood that future shocks—whether arising from demand pressures, workforce shortages or funding reform—would destabilise the system as a whole.

For these reasons, Blaby District Council does not consider that the County Council's proposal represents the right size to improve capacity or withstand financial shocks over the long term.

Question 4

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

Blaby District Council **strongly disagrees** that the County Council's proposal provides sufficient confidence that it would deliver high quality, sustainable public services over the long term.

The proposal places all statutory and discretionary services within a single, very large authority, with responsibility for some of the most complex and demand-led services in local government, including adult social care, children's services and SEND. These services are already subject to significant and sustained pressure, and evidence from across the sector demonstrates that they increasingly dominate financial and managerial capacity within large authorities. This creates a material risk that service sustainability is driven by short-term crisis management rather than preventative work or long-term improvement.

Blaby District Council is particularly concerned about the impact this model would have on preventative and place-based services currently delivered at district level. These services play a critical role in reducing demand on high-cost statutory services, yet within a single county-wide authority there is a clear risk that they would receive reduced strategic focus and investment as resources are drawn toward managing acute statutory pressures.

The proposal also lacks sufficiently developed neighbourhood-level delivery structures. While it refers to place-based working in principle, it does not establish formal neighbourhood partnerships or delegated local decision-making arrangements. At the scale proposed, this weakens the council's ability to tailor services to local needs, respond quickly to emerging issues and maintain service quality across diverse communities.

In contrast, the North, City, South model supports service sustainability by creating councils of a more balanced and manageable scale, where strategic services and local delivery are more closely aligned. This provides a stronger platform for prevention, early intervention and continuous service improvement, rather than reactive service management.

For these reasons, Blaby District Council does not consider that the County Council's proposal would deliver high quality, sustainable public services in a consistent or enduring way.

Question 5

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

Blaby District Council **strongly disagrees** that the County Council's proposal has been sufficiently informed by local views or that it demonstrates it will meet the diverse needs of communities across Leicestershire and Rutland.

While Leicestershire County Council undertook engagement as part of developing its proposal, this engagement was largely high-level and focused on gathering general feedback on principles rather than testing support for a single, large unitary authority model or exploring viable alternatives in depth. The proposal does not provide clear evidence that local concerns about scale, local identity, service accessibility or neighbourhood governance have materially shaped the final model.

Blaby District Council is particularly concerned that the proposal does not demonstrate how the views of district and parish communities—who currently experience local government through more locally focused structures—have been reflected in the design of the new authority. The scale of the proposed council would significantly increase the distance between decision-makers and communities, yet the submission does not show that residents have expressed support for this trade-off or that local needs would be better met as a result.

In contrast, the North City South proposal was developed through a more iterative and comparative process. It engaged with stakeholders on different structural options, tested public views on balance, local identity and accessibility, and demonstrated how feedback influenced the final model. Importantly, that engagement showed clear support for councils that are more balanced in size, retain recognisable local geographies and maintain stronger local connections.

The County proposal does not sufficiently explain how it would respond to the distinct needs of rural villages, market towns and semi-urban communities within a single authority, nor how local priorities would be protected in the face of county-wide decision-making pressures. As such, Blaby District Council does not consider that the proposal reflects a strong alignment with local views or provides confidence that it would meet local needs in practice.

From a Rutland perspective, Blaby District Council is also concerned that the County Council's proposal does not adequately reflect the strength of local identity and civic pride associated with Rutland as a distinct historic county. While the proposal seeks to improve administrative efficiency, it does not demonstrate that Rutland communities have expressed support for being subsumed within a very large Leicestershire-wide authority, nor how this would enhance local identity or democratic engagement.

Rutland's distinctiveness is not simply ceremonial; it underpins how residents relate to local government, participate in civic life and engage with decision-making. The absence of clear evidence that Rutland residents support the loss of a locally focused governance model raises questions about whether the proposal has been shaped by local views in a meaningful way. Models that dilute strong local identities risk weakening civic pride, reducing engagement and undermining confidence in the new structures.

By contrast, the North, City, South proposal better recognises the importance of place and identity by creating councils that align more closely with established communities and local loyalties, supporting stronger democratic connection and public trust.

Question 6

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

Blaby District Council **strongly disagrees** that the County Council's proposal would best support effective devolution arrangements.

Successful devolution depends on clear strategic leadership combined with strong, locally accountable delivery at place and neighbourhood level. The County Council's proposal creates a single, very large authority covering Leicestershire and Rutland, which risks over-centralising decision-making and reducing the flexibility required to support devolved powers effectively.

At the scale proposed, there is a heightened risk that strategic priorities would be shaped primarily by county-wide pressures, particularly demand-led statutory services, rather than by the distinct economic, social and spatial needs of different parts of the area. This weakens the ability of the system to respond to devolved responsibilities that require place-sensitive approaches, such as skills, economic growth, transport and regeneration.

The proposal also lacks clarity on how local and neighbourhood-level governance would interface with devolved arrangements. Without clearly defined mechanisms for local influence and accountability, there is a risk that devolution would be experienced as a transfer of powers to a more remote authority rather than as genuine empowerment of places and communities.

In addition, two unitary authorities of such a size disparity, sitting under a Strategic Authority does not reflect best practice in terms of a balance of power, as opposed to a three unitary solution, such as NCS, which would enable more cohesive and a better governance structure to ensure the best outcomes for our communities.

By contrast, the North City South model offers a more balanced and functional framework for devolution. It creates councils of a manageable and comparable scale,

better aligned with functional economic areas, and more capable of engaging meaningfully with devolved institutions while retaining strong local accountability. This structure provides a more resilient and credible platform for supporting devolution over the long term.

For these reasons, Blaby District Council does not consider that the County Council's proposal would best support effective devolution arrangements.

Question 7

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

Blaby District Council **strongly disagrees** that the County Council's proposal would enable stronger community engagement or provide meaningful opportunities for neighbourhood empowerment.

While the proposal makes general commitments to local engagement and place-based working, it does not establish clear or consistent neighbourhood-level governance structures. In particular, the proposal does not set out formal neighbourhood partnerships, delegated decision-making powers, or locally controlled budgets through which communities could shape priorities or influence service delivery. At the scale proposed, these omissions represent a significant weakness.

A single authority covering the whole of Leicestershire and Rutland would be required to engage with a very wide range of communities, including rural villages, market towns and semi-urban areas. Without clearly defined neighbourhood arrangements, there is a risk that engagement becomes largely consultative, with decisions taken centrally and local influence diluted by the size and complexity of the organisation.

Blaby District Council is also concerned that the proposal provides limited clarity on how parish and town councils would be empowered within the new structure, particularly in areas where they currently play a strong role in representing community interests. The absence of formal mechanisms for neighbourhood-level influence risks weakening democratic connection and reducing civic participation over time.

By contrast, the North City South model provides a more realistic platform for neighbourhood empowerment by creating councils of a more manageable scale, where decision-makers are closer to communities and where area-based and neighbourhood governance arrangements are more achievable in practice. This supports stronger local accountability, more responsive engagement and greater public trust in the system.

For these reasons, Blaby District Council does not consider that the County Council's proposal would strengthen community engagement or deliver genuine neighbourhood empowerment.

Question 8

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

The additional commentary is detailed in the answers to the questions above.

Question 9 and 10

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

Not applicable.

3. Response relating to the North, City, South proposal

For reference this is the [Leicestershire Districts and Boroughs and Rutland County Council's](#) proposal

Question 1

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

Blaby District Council **strongly agrees** that the North, City, South proposal is based on sensible and realistic geographies that reflect how our areas actually work. Of all the options put forward for local government reorganisation across Leicester, Leicestershire and Rutland, this is the one that most closely aligns with established economic and community patterns.

The proposal recognises the way people travel, work, access services and interact with their local economy. For Blaby in particular, the South Leicestershire growth area is already a well-defined and functioning geography, and it naturally sits within a South unitary authority. This is a far better fit than extending the Leicester City boundary, which does not reflect how communities in Blaby live or identify.

The strength of the North, City, South proposal is its balance and clarity:

- Leicester City keeps a geography suited to its urban regeneration needs
- The North and South authorities reflect genuine economic and spatial patterns
- Existing communities are maintained with clear and functional reasons

The accompanying options appraisal and independent analysis support this, showing that the proposed geographies perform better against Government criteria than the alternatives.

For these reasons, Blaby District Council considers the North, City, South proposal to be the most realistic and workable arrangement. It provides a strong foundation for supporting economic growth, protecting local identity and delivering effective services over the long term.

Question 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?

Blaby District Council **strongly agrees** that the councils proposed under the North, City, South model would be well placed to deliver the outcomes set out in the proposal. In

our view, this option carries the strongest evidence base and the lowest overall delivery risk of all the submissions made.

What sets the North, City, South proposal apart is the level of detail behind it. The NCS options appraisal, independently assured financial modelling and clear transition planning provide a realistic picture of what can be achieved and how. Importantly, the proposal does not depend on optimistic assumptions or unknown future reforms. It explains how outcomes will be delivered, the timescales involved and the measures in place to manage risk.

From Blaby District Council's perspective, the focus on financial sustainability through prevention and early intervention is particularly compelling. The modelling shows how savings from reorganisation are reinvested to reduce long-term demand in areas such as adult social care, children's services, SEND and homelessness. This represents a credible approach to stabilising finances while protecting outcomes for residents, rather than simply trying to manage ongoing pressures.

The North, City, South model avoids these issues by:

- Creating councils that are large enough for strong leadership but still close to their communities
- Minimising disruption and disaggregation costs by building on current upper-tier arrangements
- Setting out a realistic transition plan, including shadow governance and early financial controls

A further strength is the link between reorganisation and devolution. The proposal ensures that major issues like economic growth, infrastructure and transport are dealt with at the right strategic level, while operational services remain locally accountable and responsive.

Overall, Blaby District Council considers the North, City, South model both ambitious and deliverable. It brings together strong financial planning, evidence-based service reform and a proportionate approach to scale. For these reasons, we believe it offers the most credible pathway to sustainable improvements for residents and businesses in the medium and long term.

Question 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?

Blaby District Council **strongly agrees** that the councils proposed under the North, City, South model are the right size to operate efficiently, build capacity and remain resilient to financial shocks. We see this as one of the proposal's major strengths.

The population sizes for the three proposed councils strike the right balance. They are large enough to bring the financial and operational benefits that come with scale, but not so large that they lose focus or the ability to provide strong leadership and clear accountability. Getting this balance right is essential if councils are to remain effective in a very challenging financial climate.

What makes the North, City, South model convincing is not just the size of the councils, but the way scale has been thought through. The proposal is backed by detailed, independently checked financial modelling, which shows:

- All three councils can deliver sustainable financial positions over a ten-year period
- Around £44 million in annual efficiencies generated through reduced duplication, streamlined governance and better procurement
- A realistic approach to managing transition costs, without depending on overly ambitious or untested assumptions

Crucially, the modelling shows that councils of this size have the financial strength to absorb shocks, supported by broader tax bases, stronger balance sheets and the ability to invest in prevention to reduce long-term demand. This is especially important for areas like Blaby, where growth and rising service pressures require councils that are both efficient and resilient.

The North, City, South proposal helps reduce risks by:

- Retaining existing upper-tier service structures, limiting disaggregation costs
- Creating councils big enough to sustain specialist expertise in high-risk areas such as adult social care, children's services and SEND
- Allowing earlier and more effective investment in prevention to help manage long-term pressures

In Blaby District Council's view, the "right size" is not about creating the biggest councils possible, but about creating councils that are financially stable, adaptable and able to deliver consistently over time. The North, City, South proposal achieves this balance more effectively than the alternatives and provides the strongest platform for sustainable, resilient local government in the years ahead.

Question 4

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

Blaby District Council **strongly agrees** that the councils proposed through the North, City, South model will be well placed to deliver high-quality, sustainable public services,

and considers this proposal to offer the most credible long-term service model of those submitted.

The NCS proposal is grounded in a clear understanding that service sustainability cannot be achieved through structural change alone. Instead, it combines the benefits of scale with a deliberate shift towards prevention, early intervention and place-based delivery, particularly in the most financially and operationally pressured services, including adult social care, children's services, SEND and homelessness.

From Blaby's perspective, this approach is critical. The proposal demonstrates how efficiencies generated through reorganisation are reinvested into frontline services, strengthening capacity, stabilising workforce arrangements and reducing long-term demand. This provides a credible pathway to maintaining service quality while addressing the structural financial challenges facing local government.

The proposed councils are also of a manageable and effective scale for service delivery. They are large enough to sustain specialist expertise, improve commissioning and build resilience in statutory services, while remaining sufficiently local to support integrated working with partners, voluntary organisations and communities.

By contrast, a single county-wide unitary authority risks creating service models that are too remote and standardised to respond effectively to local need across a highly diverse geography. Equally, proposals involving significant boundary expansion by Leicester City Council introduce the risk of service disruption during transition, particularly where existing delivery arrangements and partnerships would need to be reconfigured at pace.

The NCS proposal mitigates these risks by:

- Building on established upper-tier service delivery arrangements
- Minimising disaggregation and fragmentation of services
- Providing a clear and phased transition plan to protect service continuity.

Importantly, the proposal embeds a mature and well-developed model of neighbourhood and place-based working, ensuring that services remain genuinely accessible, locally informed and responsive to the needs of different communities. By organising service delivery around coherent neighbourhood footprints, supported by integrated multi-disciplinary teams, the proposed councils can intervene earlier, coordinate support more effectively and reduce long-term demand pressures on high cost statutory services. This approach strengthens prevention, reinforces local accountability and provides a sustainable framework in which housing, health, social care, community safety and voluntary-sector capacity can be aligned around the needs of people and place — something that a larger or more centralised model simply could not achieve.

Blaby District Council therefore considers the North, City, South proposal to provide the strongest foundation for sustainable, high-quality public services, combining financial realism, service resilience and local responsiveness in a way that the alternative proposals do not.

Question 5

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

Blaby District Council **strongly agrees** that the North, City, South proposal has been genuinely shaped by local views and is well placed to meet the needs of communities across Leicester, Leicestershire and Rutland.

The proposal draws on a broad and independently delivered programme of engagement, including public consultation, stakeholder discussions and targeted work with partners and community groups. This has provided a strong understanding of what residents value most: a sense of local identity, accessible services and confidence that the new arrangements will be sustainable over the long term.

For Blaby, these findings are especially relevant. Local residents repeatedly raised concerns about options involving major boundary changes or the loss of established district identities. They also expressed a clear preference for models that keep decision-making connected to local places while improving service resilience. The North, City, South proposal reflects these views by avoiding unnecessary boundary expansion and by building neighbourhood and place-based governance directly into the structure of the new councils.

The proposal also responds well to the differing needs across the area. It recognises the specific challenges linked to urban deprivation in Leicester City, as well as the growth, infrastructure and service pressures affecting districts such as Blaby. By creating councils that align with these different patterns of need, the proposal avoids a one-size-fits-all model and allows for more tailored decision-making.

In addition, this proposal has been produced by Councils that cover the whole geography of Leicestershire and Rutland. With 8 of the Councils across LLR coming together to ensure a locally led rather than politically driven proposal was developed. In addition, all of the group leaders representing Blaby District fully endorse and support the NCS proposal which demonstrates the community buy in and support for the proposal.

The North, City, South proposal shows clearly how engagement has shaped both the geography and the governance model, with commitments to:

- Strong neighbourhood-level engagement and local decision-making

- Clear and meaningful roles for town and parish councils
- Continued community involvement throughout transition and implementation

In the view of Blaby District Council, the proposal does more than simply gather local views—it acts on them. It provides a structure that reflects local identity, meets community needs and strengthens public confidence in how local government will operate in the future. Of the options presented, it is the most grounded in local opinion and best aligned with what communities have said they want.

Question 6

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

Blaby District Council **strongly agrees** that establishing the councils proposed through the North, City, South model will actively support and strengthen devolution arrangements, particularly in the context of Government’s updated focus on the creation of Strategic Authorities.

A key strength of the North, City, South proposal is that it has been designed with a clear understanding of the distinct but complementary roles of different tiers of governance. The proposal creates unitary councils of a balanced and proportionate size, which are well suited to sitting beneath a Strategic Authority responsible for region-wide priorities such as economic growth, transport, skills and major infrastructure.

For Blaby District Council, this balance is critical. Councils of the scale proposed through the NCS model are:

- Large enough to engage effectively with a Strategic Authority as credible and capable partners
- Financially and operationally resilient enough to take on devolved responsibilities where appropriate
- Sufficiently local to retain strong democratic accountability and focus on community-facing services

The NCS proposal therefore provides a clear and logical governance architecture, avoiding duplication or blurring of roles between strategic and local tiers. Strategic Authorities can focus on long-term regional outcomes, while the North, City and South councils concentrate on high-quality service delivery, place leadership and neighbourhood engagement.

Importantly, the NCS proposal is future-proofed. It creates councils that are not only viable in their own right, but optimally configured to operate within a devolved system, supporting collaboration, strategic coherence and long-term economic growth.

Blaby District Council therefore considers the North, City, South proposal to provide the strongest and most coherent platform for devolution, aligning local government reorganisation with Government's direction of travel and maximising the benefits of devolution for residents, communities and businesses across the region.

Question 7

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

Blaby District Council **strongly agrees** that the North, City, South proposal would strengthen community engagement and create real opportunities for neighbourhood-level empowerment. A key reason for this is the balanced scale of the proposed unitary councils, which makes it possible to combine strategic capability with genuine local connection.

The proposal recognises that meaningful neighbourhood engagement only works when councils are of a size that allows leaders to stay close to their communities. The three proposed unitary authorities—North, City and South—would be large enough to be financially resilient and well equipped to deliver major services, but still small enough to maintain accessible decision-making and visible local leadership.

The proposal also fits well with the Government's direction on devolution, but crucially it goes further by embedding a robust model of place-based working that actively empowers neighbourhoods. Rather than engagement being an occasional exercise, the North, City, South model creates a permanent local infrastructure, Neighbourhood Partnerships, neighbourhood-aligned service teams, and locally co-designed community plans that gives residents an ongoing voice in shaping priorities. By organising services around coherent neighbourhood footprints, local people can directly influence decisions on issues that affect them most, such as community safety, public realm, local health needs and housing standards. This approach ensures that community insight is not just welcomed but becomes a core driver of how services are designed, targeted and improved over time—creating a more empowered, confident and resilient community culture.

The proposal also fits well with the Government's direction on devolution. Under this emerging model, Strategic Authorities focus on region-wide issues such as economic growth, transport and skills, while unitary councils provide leadership for community-facing services and neighbourhood engagement. This separation means that local voices do not get lost in a regional structure but instead remain central to how services are shaped.

The North, City, South model strengthens neighbourhood empowerment through:

- A clear commitment to place-based and neighbourhood working within each new council
- Reinforced roles for town and parish councils, which is particularly relevant in areas like Blaby where these structures are well established
- Opportunities over time to devolve decision-making and resources closer to communities
- Governance arrangements that ensure ongoing community involvement during both transition and implementation

Overall, the North, City, South proposal creates a governance structure that is both strategic and community-focused. By establishing three councils of a balanced size beneath a Strategic Authority, it supports strong regional leadership while giving communities the space and influence they need.

For these reasons, Blaby District Council considers the North, City, South model to provide the strongest foundation for local engagement and neighbourhood empowerment, ensuring residents continue to have a meaningful voice in shaping their local areas within a devolved system.

Question 8

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

The additional commentary is detailed in the answers to the questions above.

Question 9 and 10

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

Not applicable.