Council	
Meeting Date	19 November 2025
Report Title	Local Government Reorganisation Submission of Business Case to Government
EMT Lead	Larissa Reed – Chief Executive
Head of Service	Larissa Reed – Chief Executive
Lead Officer	Stephanie Curtis, Strategic Policy and Communities Manager
Classification	**Open**
Recommendations	1. For Council to agree which Business Case option should be put forward to Government for Local Government Reorganisation for Kent and Medway. 2. For Council to provide Delegation to the Chief Executive to submit the agreed proposal to MHCLG by the 28 November 2025 and to undertake any other necessary steps as part of this process.

1 Purpose of Report and Executive Summary

1.1 Following the publication of the English Devolution White Paper in December 2024, all councils in Kent and Medway were invited in February 2025 by the Secretary of State to submit proposals for local government reorganisation (LGR) for the region of Kent.

1.2 This paper provides an overview of the collaborative work that has taken place since February 2025 on LGR between all Kent Councils, and a summary of the business case(s) due to be submitted to government on 28 November 2025.

2 Background

2.1 Kent and Medway's 14 Local Authorities have a strong history of working closely together on shared risks and opportunities, lobbying on significant areas of common interest, and on responding collectively to strategic developments nationally or regionally. This is primarily through existing groups including Kent Council Leaders (a group made up of Kent's 14 elected Council Leaders) and Joint Kent Chief Executives (a group made up of the Chief Officers of Kent's 14 Local Authorities alongside our wider strategic local partners).

2.2 On 16 December 2024, HM Government published the English Devolution White Paper setting out its ambition to reshape local government in England. This would be through a combination of devolution to new strategic authorities and reorganisation of all of the remaining two-tier local government areas in England into unitaries. The English Devolution and Community Empowerment Bill published on 10 July 2025 formalised HM Government's intentions to enact these changes.

2.3 In response to the White Paper, Council Leaders in Kent were invited to apply for, and submitted a formal request to receive priority status to be included in the Devolution Priority Programme (DPP). If successful, this would have accelerated the devolution process and provided additional Government support for those Councils on the DPP.

2.4 On 5 February 2025 Government notified Councils in Kent and Medway in a letter from the then Local Government Minister that they were not selected to be on the DPP and instead received a statutory invitation to submit proposals for Local Government reorganisation (LGR). This included guidance around the development of proposals and an expectation that all 14 Councils would collaborate.

2.5 The letter detailed a timeline for the process, including a requirement for a joint interim proposal by 21 March 2025 setting out direction of travel and intentions, and a deadline of 28 November 2025 to receive a final submission on reorganisation. Kent Council Leaders agreed to endeavour to work together to respond to the Minister's direction.

2.6 On 21 March 2025, Kent Council Leaders submitted an interim response setting out the councils' commitment to working together on reorganisation, highlighting examples of exceptional challenges faced only by Kent, the importance of aligning devolution with reorganisation and the risks of not having a strategic countywide body for Kent. Alongside the collective response signed by all 14 Council Leaders, there were a number of 'side letters' from individual councils in Kent.

2.7 Government have been clear that councils are expected to work together to develop LGR proposals for their areas. Each area nationally has been awarded funding to contribute towards the development of proposals. Kent and Medway were awarded £514,410.

2.8 Kent Council Leaders agreed to use this money collectively to develop a shared evidence base, options appraisal and business case(s) to prepare for the 28 November 2025 submission and procure the necessary external support and expertise to meet the deadline. KPMG were appointed as the Kent Councils Strategic Business Partner following a joint procurement process for Phases 1 and 2 as set out below and commenced work with all 14 Councils in July 2025.

2.9 The work was spilt into 4 phases as below:

- Phase 1 – Evidence Base and Options Appraisal
  - KPMG work with all 14 Councils to develop a single, impartial, shared evidence base and options appraisal, identifying a long list of options (geographies) and appraising them according to the Minister's specified criteria.

- Phase 2 – Strategic Business Case Development
    - KPMG has been working with all 14 Councils on preparing and refining the chosen options into strategic business cases in preparation for 28 November 2025 submission deadline.

- Phases 3 and 4 – Ongoing Support to Vesting Day Requirements
    - Following Ministerial decision, significant work will then be required to prepare for transition from the existing 14 Councils to the new Unitary Council(s) in a safe and legal way. Phase 3 will run from Ministerial decision to election to shadow authority(s), and Phase 4 from election to shadow authority(s) to vesting day (the day upon which formal responsibility is handed over).

2.10 A further procurement process will be required for any additional external support determined necessary for Phases 3 and 4. The existing contract with KPMG is for Phases 1 and 2 only.

2.10 At an extraordinary Kent Council Leaders meeting 3 September 2025, Leaders were presented with the evidence base and options appraisal assembled by KPMG colleagues with significant input from staff across all 14 Councils. There were seven geographies in scope.

2.11 As per the governance jointly set around the strategic business partner contract and the funding from Government, each Leader was asked to select the option they would support progressing to strategic business case, the two with the most support then being prioritised for the collective process. As a result of the debate, Options 3a and 4b were selected to progress (see appendix 1 and 2 for business cases executive summaries – please note these reference appendices contained within the main business cases that are available on the Kent Leaders website – see website link referenced within this report).

2.12 Leaders were then asked to consider on whether they would like to progress any additional options to strategic business case at an additional cost, requiring a simple majority (8 out of 14 Leaders) to progress as part of the jointly funded work. After discussion by the leaders, Options 1a, 4c, 4d and 5a did not attract a majority and as such were not agreed to progress within the jointly funded work. Maps setting out the various unitary geography options at each stage of the selection process are contained in Appendix 3.

2.13 Subsequently, Kent County Council (Option 1a), Medway Council (4d) and Dartford and Gravesham Borough Councils (5a) (see appendix 4, 5 and 6 for their business case executive summaries) determined they are willing to self-fund strategic business cases for their specified options. These had progressed as part of the joint process with support from the jointly appointed strategic business partner and aligned with collective work around the shared evidence base and overarching governance and timescales. Ultimately, strategic business cases can be submitted by individual councils or groups of councils. Each council can only support one case.

2.14 Timescales leading up to 28 November 2025 submission have been tight and as such, a regular rhythm of collaborative governance meetings, milestones and activity was established. These include:

- Steering Group – weekly chief executive and senior officer meetings to oversee the activity leading into the strategic business cases and ensure it is delivered to time and on budget with the strategic business partner.
- Local Authority Chief Executives – weekly Programme Board role in terms of officer decision-making, oversight, and liaison with Leaders.
- Kent Council Leaders – meetings at regular intervals and at key milestones to ensure the process is genuinely politically-led and proceeds as per Leaders collectively agreed approach, ultimately producing what Leaders need to satisfy governance in each of their individual Councils and enable a submission on 28 November 2025.
- Kent Finance Officer Group – fortnightly meetings working with KPMG on the information including in the financial model.

2.15 Following submission, it is likely there will be a period of several months until we receive notice of the Minister's decision on a selected option and geography. Early indications are this will likely be between Spring/Summer 2026.

2.16 The Structural Change Order (SCO) that officially creates the new councils, the shadow elections and vesting date, will likely be enacted after the summer recess in 2026.

2.17 In the interim, learning from other areas that have been through reorganisation before, it will be important for Councils to collectively prepare for Phases 3 and 4 so that they will be ready to progress the necessary and extensive transition work required to ensure services are safe and legal on day 1 of the new Unitary Council(s).

2.18 Therefore, whilst waiting for decision, it is envisaged that Kent Council Leaders and Chief Executives will work collaboratively and focus on putting in place the arrangements required and to determine any procurement activity they deem necessary for a strategic business partner for Phases 3 and 4.

2.19 Each council is invited to submit a proposal which covers the whole of Kent. A Council can chose not to submit a proposal; however this does not mean that they will be exempt from LGR, they will be consulted on the chosen proposal.

2.20 Once the proposals have been received, they will be assessed against the following criteria.

- Establishing a single tier of local government
- Efficiency, capacity and withstanding shocks
- High quality and sustainable public services
- Working together to understand and meet local needs
- Supporting devolution Arrangements
- Stronger Community Engagement and neighbourhood empowerment

3.0 Proposals

3.1 Appendices 1-5 detail the Business Case Executive Summaries. The full versions of the business cases have been published at Councils Reveal Draft Business Cases for New Councils - Kent Council Leaders.

3.2 The outline of each business case is as follows:

Option	Where Swale Sits	Pros	Cons
1a – Single authority with 3 assemblies	Swale will be part of the Single Unitary Council	-No disaggregation costs (some aggregation costs) -Less disruption for staff and residents -The ability to share costs across a wider areas	-Would not enable devolution (as requires 2 councils for devo) -11,000 residents per councillor -Large area – could lead to impersonal services
Option 3a – 3 unitary councils	Swale, Medway, Gravesham and Dartford	-Three balanced councils -lower disaggregation costs and a shorter payback period	-The unitary containing Swale does not meet the resident's idea of sense of identity or community - Fewer councils will mean more residents per councillor
Option 4b – 4 unitary councils	Swale, Ashford, Folkestone	-Already share services with Ashford -More aligned with residents' sense of identity -Manageable payback period -Better ratio of councillors to residents than options 1a and 3a	-Swale currently has no links with Folkestone and Hythe -The payback period (although manageable is longer than in options 1a and 3a)
Option 4d – 4 unitary councils	Swale will be split up into 3 different councils	-Residents in Faversham look towards the East of the County. - Manageable payback period. -Better ratio of councillors to residents than options 1a and 3a	-This option splits up Swale including splitting existing parishes - The payback period (although manageable is longer than in options 1a and 3a)

Option 5 – 5 unitary councils	Swale will be split up into 2 different councils	-This option has the best resident councillor ratio -smaller councils so more local services -better health links than other options	-longest payback on all councils (may never payback the set up costs) -This option Splits up Swale.

3.3 There are pros and cons for each business case and as such there is no officer recommendation

3.4 Ultimately Government will decide on the option for Kent based on the criteria

Financial Analysis

3.5 The cost of developing a business case is being funded from a government grant of £514,410 paid directly to KCC. The procurement of management consultants, KPMG was undertaken by KCC based on a specification determined by Kent Leaders and Chief Executives of all 14 authorities.

3.6 KPMG have provided and used a model to assess the unitary options submitted by individual councils using Government-defined criteria. Their approach is based on a high-level, top-down financial model that estimates the impact of disaggregating and aggregating existing services. This model applies broad assumptions regarding potential savings in staffing, property, and third-party expenditure based upon information requested by KPMG and supplied by the Kent Authorities.

3.7 The modelling is based on current budgeted 2025-26 spend and forecast spend in subsequent years from the 14 individual councils. As far as possible this spend has been compiled on a like for basis using the definitions used in statutory returns. These are based on net service spend before any income from central government grants or local taxation. This may differ from how spend is reported internally within the individual councils.

3.8 KPMG's financial model is made up of three elements

- Implementation costs – estimates the one-off transition costs associated with moving to a new unitary model
- Disaggregation costs – estimates the additional recurring expenditure that results from moving to a new unitary model
- Reorganisation savings – estimates the annual high-level savings potential from efficiencies that can be unlocked through reorganisation (e.g. workforce, governance, systems etc.)

The following table provides comparison of key financial information across the options being considered for Kent and Medway

Table 1 – Financial modelling assumptions

Costs and Savings	1A	3A	4B	4D	5A
One-off implementation costs	**£99.4m**	**£127.7m**	**£130.9m**	**£135.9m**	**£139.1m**
Recurring disaggregation costs*	**£6.0m**	**£19.7m – £29.2m**	**£32.9m – £48.6m**	**£32.9m – £48.6m**	**£46.0m – £68.1m**
Recurring reorganisation savings	**£69.0m**	**£69.4m**	**£67.5m**	**£67.5m**	**£65.7m**
Payback period	**3.3 years**	**5.4 – 6.7 years**	**7.8 – 14.3 years**	**7.9 – 14.5 years**	**14.0 years – no payback**

* The range demonstrates the sensitivity of changing just one of the cost assumptions in the model between 0% and 1% for disaggregation costs following collaborative discussions around different scenarios for the impact of LGR on commissioned spend across adult and children's social care. The range is not required for 1a as there is no disaggregation of social care.

3.9 The Kent Finance Officer Group (KFOG) have collectively agreed on the following position on the analysis carried out:

- LGR, whilst generally expected to be positive for local government finances in the long term, will not solve the cost, demand and associated funding challenges currently being faced. The scope of the financial modelling considers purely the impact of reorganisation, all other things being equal.
- The work carried out at this stage is not a zero-based exercise of the financial impact of LGR. Assumptions are based on the past LGR business cases produced to support other areas which have been through the LGR submission process in recent years.
- Due to the size and number of councils in Kent, there is not a fully comparable example of recent reorganisations elsewhere in the country to confidently benchmark against. Due to the level of complexity, payback periods in Kent may therefore be longer than some other reorganisations.
- The speed of delivery and level of savings post vesting day of the new councils will largely be impacted by decisions already made by the predecessor authorities and those taken by the new authorities. These include decisions in relation to contractual obligations, borrowing, transformation and wider public service reform.
- The financial modelling does not take account of how transition costs will be funded.
- The assumptions in the model have not been tested against actual outturn data for any of the previous local government reorganisation programmes.
- Given the context above, the modelling should not be seen as a set of targets that new authorities may be held to account for, as setting the post-vesting day budget will be the responsibility of the new authorities.

- Consolidation of assets, reserves and debt is outside the scope of this work and will have material implications under any of the unitary options proposed.

3.10 Whilst being fully supportive of the long-term benefits of LGR, all Kent Finance officers agree that LGR does not in itself provide a viable solution to the scale of the financial challenge faced. The modelling is a high-level assessment of the quantum and timing of potential additional revenue costs and savings arising from the reorganisation of councils. The modelling is designed to enable a reasonable like for like comparison of the potential costs and savings and ultimately pay-back periods under the possible different new unitary configurations. As such it does not make any assessment of financial viability of future new unitary councils.

3.11 However, there are limitations to this methodology. The model does not fully reflect the operational complexities of local government, including:

- Evolving property usage post-pandemic, which may affect assumptions around estate rationalisation.
- Long-term contractual arrangements that may restrict the ability to realise economies of scale.
- Local variations in service delivery models and partnership arrangements.

3.12 With regards to income, the model assumes that council tax will be equalised. However, this is contingent upon two key factors, adherence to the council tax referendum principles and particular Alternative Notional Amounts being issued by the Minister and secondly, acceptance by the public. Ultimately, this decision will rest with the newly formed unitary authorities, and the model reflects an assumption rather than a confirmed outcome.

3.13 The cost of reorganisation is substantial but there is no certainty that the modelled savings will materialise to the scale required to offset these costs in the short term.

3.14 The report is limited to the options being proposed.

3.15 The model does not incorporate the potential impact of the Fair Funding Review 2.0 and Business Rates Reset, nor does it account for existing budget gaps within individual authorities' Medium-Term Financial Strategies. These financial pressures will persist regardless of reorganisation and are not addressed within the scope of the options appraisal.

3.16 The Council allocated funding of £100,000 for LGR in 2025/26 to cover the costs of the LGR posts created in the year, a further £100,000 is proposed within the assumptions for the 2026/27 draft budget. It is not clear how councils can fund the cash-flow requirements or the extent of any government funding. The majority of costs will occur in the early years of the new unitaries with the expectation that future savings can be delivered.

3.17 The long-term financial viability of LGR and new unitaries remains questionable fiscal devolution.

4.0 Alternative Options Considered and Rejected

4.1 It was agreed by Council at the Extraordinary meeting on 17 September 2025 that Swale Borough Council remains part of the Kent Programme working with KPMG to produce full business cases for model 3a and 4b, rather than develop our own business case for an alternative option. Given the 28 November 2025 deadline for the submission of our preferred model to MHCLG, there would not be time for a further model to be properly explored and agreed.

4.2 To not submit a recommended proposal – there is an option to not submit a preferred proposal. However, this would not stop LGR taking place and Government consulting and then agreeing on which model to implement. This option is not recommended as the views of Swale would not be considered as part of the Secretary of States deliberations.

5.0 Consultation Undertaken or Proposed

5.1 There was no statutory requirement on the Council to consult residents affected by a proposed reorganisation (see legal section). However, the Secretary of State's invitation and guidance stated that is it for councils to decide how best to engage locally and in a meaningful and constructive way.

5.2 Public and stakeholder engagement on Local Government Reorganisation took place between Tuesday 9 September 2025 and Friday 10 October 2025. The exercise was run by Canterbury City Council on behalf of Kent County Council, Medway Council and the 12 district and borough councils. A detailed report can be found on the Kent Leaders' website. The information does not in itself lead to a conclusion on a preferred option but rather informs the narrative for various assessment criteria, design considerations for future councils and risks through the lens of the public's expectations of new councils

5.2 A total of **2,107 responses** were received from the public. The feedback tells us about what the public care about most with respect to LGR, opportunities, their concerns and what matters less. The pattern is consistent across the geography of Kent.

5.3 The top priorities are identified as:

1. Quality of services delivered
2. Speed of problem resolution
3. Fair and stable council tax
4. Efficiency and value for money
5. Ability to influence decisions locally
6. Being able to contact their councillor

5.4 There are some subtle differences in terms of age groups. All age groups ranked service quality as their top priority; the differences between the ranking of the top factors are minimal. Service quality is a priority for people considering themselves to have a disability or a long-term health condition; they also put a strong emphasis on influencing decisions.

5.5 Factors of secondary importance were a sense of belonging, area size and the ratio of residents to councillor, the ability to visit a council office population size, residents in each ward

5.6 The factors considered less important included number of councillors and attendance at council meetings

5.7 Opportunities identified by respondents' comments have been grouped to reflect the main sentiments expressed in each response. The most frequently raised themes were as set out below:

- Service standardisation and accessibility – clearer responsibilities, easier navigation.
- Economies of scale – reduce duplication and bureaucracy, improve value for money.
- Resident-focused governance – local accountability, inclusive culture.
- Keeping council tax fair and stable – harmonisation across areas.
- Enhanced services – planning, infrastructure, education, and care.
- Optimism for transformation – positive change through a fresh perspective.

5.8 The public's key concerns are:

- Loss of local connection – fear of remote, impersonal councils.
- Disruption and cost of transition – risk of service delays and financial strain.
- Scepticism as to whether the promised efficiencies would outweigh the significant costs of restructuring.
- Reduced accountability – worry about democratic erosion.
- Service quality deterioration – stretched budgets, loss of expertise.
- Debt sharing – concern over subsidising less efficient councils.

5.9 Crucially, the approach to public and stakeholder engagement was not aimed at gauging support for specific options, but rather at exploring the potential benefits and opportunities, alongside any concerns or challenges associated with the proposals. This enabled Councils to take a well-informed and thoughtful approach in addressing these factors within the proposals.

5.10 Stakeholder and Partner engagement has been ongoing since February 2025 for the Interim Submission in March 2025. The engagement has sought to understand:

- What are the key factors that should be taken into account for reorganisation
- What opportunities could be realised by reorganisation
- What problems could be fixed by reorganisation
- What problems could be created or will not fixed by reorganisation

5.11 Kent Councils recognised the importance of close collaboration with their partners and the opportunities for Public Sector Reform. Therefore, Workshops were also undertaken with key strategic partners (including Health, Police, Education, DWP). These workshops explored the options being considered, and having an open discussion on: Challenges in the current system and ways of working; strengths in current ways of working to be protected and/or built upon; opportunities that LGR brings to improve ways of working

5.12 Swale Borough Council also ran its own engagement session with key partners and the voluntary, community and social enterprise sector. This focused around similar questions as outlined in 5.4. Key feedback included:

- Concern re loss of identity and local knowledge and therefore a need for resident and VCSE involvement in shaping future services;
- Opportunities include knowledge sharing, resource sharing and reduced duplication of services.

5.13 Swale Borough Council also ran its own workshop with Members during October 25. Key feedback included:

- Concern about councillor numbers in proposed models and reduced democratic accountability; along with the skills and time required for new councillors of a unitary.
- Recognition that LGR will reduce impact on duplication, accountability and confusion around service delivery for residents
- That there will be an opportunity to deliver services differently and to address issues that affect our place, without complication of two tiers
- Opportunity for improved communication with partners and other key stakeholders at both a local and regional level.
- Opportunity and challenges linked to educational boundaries and how current issues can be addressed.
- Opportunity for more coherent and joined up strategic priorities across a new unitary
- Collaboration and transformation of services would be easier.

5.14 Swale Borough Council also ran its own workshop with parish and town councils in November 25. Key feedback included:

- New unitary councils will give a ‘one stop shop’ for residents and enable them to have a better understanding of services.
- Overall concern that more localised services will fall to parish/town councils and how they will support this without further funding e.g. councillor numbers and skills.
- Opportunity to engage parish and town councils in implementation to ensure bring communities along with the process.
- Opportunity for parish/town councils to support each other and increase working together.

6.0 Implications

Issue	Implications
Corporate Plan	Local Government Reorganisation is not currently part of the corporate plan, however it is a key piece of work which is critical to the future of services in Swale
Staffing	The intent set out in the White Paper has profound implications for staffing. If the proposals are implemented, Swale Borough council will cease to exist as an entity with the Council's functions being subsumed into a new, larger successor unitary authority and staff from a variety of councils being TUPE transferred to the successor authority. Every effort is being made to engage and inform staff about developments with regards to the LGR process – including seeking feedback on sentiment and support needed. The uncertainty associated with the current lack of clarity about the future and the subsequent implementation of change has had and will continue to have impact for our staff with risk to the wellbeing of individuals and for service delivery. Proposals will be brought forward for additional investment in training, development and wellbeing support in the budget proposals for 2026/7 and 2027/8. There is also potential to impact on the recruitment and retention of staff and we will do all that we can to manage this. We recognise that as the process unfolds there will need to be dedicated workstreams introduced as part of any programme and project management arrangements to manage the impact for our staff. Development of LGR options and business cases, in collaboration with other Kent authorities, has been achieved by prioritising the work required; this has been complemented by Kent Councils' strategic partner KPMG.
Financial, Resource and Property	Financial implications are discussed within the main body of the report.
Legal, Statutory and Procurement	The Sectary of State has invited (Letter from MHCLG) the Leaders of all fourteen councils in Kent and Medway to submit proposals for a single of tier of local government under Part 1 of the Local Government and Public Involvement in Health Act 2007 ('the 2007 Act').

	Once proposals have been received, the Sectary of State will consider them and undertake the statutory public consultation on the proposals in 2026. There is no requirement to consult on every proposal received. Following consultation, if the Secretary of State decides to proceed with one of the reorganisation proposals (with or without modifications), then a detailed Structural Change Order dealing with the transfers of powers, property, assets, and staff, as well as any boundary and electoral changes necessary to give effect to the reorganisation will need to be laid in Parliament. This will also set out a timescale for implementation of the new structures and sets out interim arrangements. Whilst many of the specific obligations regarding a particular reorganisation are derived from the primary Statutory Instrument passed under Section 7 of the 2007 Act, the Secretary of State has also passed a series of more generic regulations applicable to all reorganisation under Section 17 of that Act. These cover the common practical issues that arise when implementing a re-organisation including finance requirements, the transfer of assets and employees and other necessary transitional arrangements. Section 16 of the act provides for agreements between successor authorities. Members should note that they are not obligated to submit a proposal.
Crime and Disorder	There are no direct crime and disorder implications of this proposal
Environment and Climate/Ecological Emergency	There are no direct Environmental Emergency implications of this proposal
Health and Wellbeing	There is no direct Health and Wellbeing impact of this proposal
Safeguarding of Children, Young People and Vulnerable Adults	There are no direct safeguarding implications of this proposal
Risk Management and Health and Safety	If a local authority decides to not provide a submission to government by 28 November, the Minister will still take a decision on their preference for local government reorganisation, however this will not factor in detailed local knowledge and understanding of the area alongside its strategic opportunities and challenges.

	There is a risk that a decision from the Minister on the chosen option and geography will be delayed and this will have subsequent impacts on the timeline for work to be completed in Phases 3 and 4. This can be mitigated by ensuring regular communication between MHCLG, Local Authority Chiefs, Kent Council Leaders, and planning timelines for completion of work in Phases 3 and 4 which includes some contingencies for delays. Risk management processes will be adopted throughout the LGR timeline, and ensure that implementation and transition risks are logged, managed and appropriately overseen.
Equality and Diversity	An Equality Impact Assessment (EqIA) has been undertaken for local authorities in Kent and Medway responding to the Government's statutory invitation to submit proposals for LGR (see Appendix 7). This EqIA has been developed to assess the potential general implications of LGR and is not option specific. A more detailed and specific EqIA will be required once the government announces the final configuration of unitary councils across Kent and Medway. LGR offers a strategic opportunity to improve public services and outcomes for all communities, including those with protected characteristics. By enabling more integrated and efficient service delivery, enhancing accountability, and promoting inclusive governance, LGR supports a whole-system approach that strengthens collaboration across council services and external partners. It facilitates place-based planning, digital transformation, and the use of data to inform equitable service design. New unitary councils will aim to preserve local identity while embedding community voices, especially underrepresented groups, into decision-making. Aggregating services across areas such as housing, education, and employment allows for more holistic responses to diverse needs, while improved accessibility and the sharing of best practice promote innovation and continuous improvement. The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy proposals, service restructures, or operational changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation. It should also be noted that the decision to implement LGR has been taken by the Minister of State for Local Government and English Devolution, who will also make the decision on the

	geographies for the new Unitary Councils. Whilst it is appropriate that equalities impacts are considered by local authorities in implementing these decisions, the decision on the geographies for the new Unitary Councils lies with the Minister of State.
Privacy and Data Protection	There are no direct privacy or data protection implications of this proposal

7 Appendices

- Appendix 1: Appendix 1: Business Case Executive Summary – Option 3a
- Appendix 2: Business Case Executive Summary – Option 4b
- Appendix 3: Maps detailing geography options.
- Appendix 4: Business Case Executive Summary – Option 1a
- Appendix 5: Business Case Executive Summary – Option 4d
- Appendix 6: Business Case Executive Summary – Option 5
- Appendix 7: Equality Impact Assessment

8 Background Papers

- Full Business Cases are available at **Councils Reveal Draft Business Cases for New Councils - Kent Council Leaders**