

## Section A. Summary

Fenland District Council believes that Local Government Reorganisation (LGR) is necessary and overdue. But we strongly oppose the way that Government is trying to implement LGR. We believe that the process is unduly rushed, it is unduly restricted in scope because it has been rushed, fails to recognise the need to maintain a sufficiently small ratio of electors to councillors and incorrectly dismisses the value of smaller-scale local Councils.

We recognise that Government nevertheless appears determined to push through this flawed policy. Given that fact, Fenland District Council wishes to record its support for proposal 4 (Option D) as being by far the least worst option if LGR is going to be forced through.

Our rationale for doing so is given below.

## Section B. South Cambridgeshire & Cambridge City

Greater Cambridge is perhaps the most straightforward geography within Cambridgeshire & Peterborough in relation to Local Government Reform: Cambridge City and South Cambridgeshire already operate as a single economic ecosystem driven by sciences, high-tech industries, university research, and globally significant innovation. Travel, housing markets, business networks, and strategic planning bodies already operate on this footprint and it is already widely recognised by government, investors, and global partners.

South Cambridgeshire District Council and Cambridge City Council already operate jointly in a number of areas. Planning Services and development of a new Local Plan are already fully aligned with shared services between the two Councils. The Greater Cambridge Draft Local Plan is already well advanced. The two Councils are working together to produce a joint Transport Strategy for the two Council areas. They constitute the Eastern end of the Ox-Cam Arc (more commonly now referred to as the “Oxford to Cambridge Growth Corridor”) which nationally is the most important and ambitious of the government-led “Growth Corridor” initiatives, seeking to unlock the substantial potential in the area for additional economic growth. The barriers to growth identified in both Cambridge City and South Cambridgeshire had led to the creation of the Cambridge Growth Company, a Government-established subsidiary of Homes England, which is working on seamless initiatives across Cambridge and South Cambridgeshire focusing on housing, transport and water infrastructure. And Government is currently consulting (close date 1<sup>st</sup> April 2026) on deepening the Cambridge Growth Company initiative by transitioning it into a centrally-led Development Corporation for Cambridge City and South Cambridgeshire, with enhanced planning and land-assembly powers, all focused on promoting growth. Government has committed up to £400 million to kickstart development and infrastructure projects within the area of Cambridge City and South Cambridgeshire, on top of the initial £10

million allocated in late 2024. The proposed operational boundary for the new Greater Cambridge Development Corporation aligns exactly with the combined administrative areas of Cambridge City Council and South Cambridgeshire District Council.

The case for creating a Unitary Authority comprising the current areas of Cambridge City Council and South Cambridgeshire District Council is therefore very strong. Both Councils support such a proposal. In fact, all but one of the Councils in Cambridgeshire & Peterborough support this proposal. Fenland District Council contends that, regardless of Local Government Reorganisation, the creation of a Unitary Authority covering Cambridge City and South Cambridgeshire fully correlates with the Government, and local growth agenda.

## Section C. Proposal 4 (Option D)

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

**Answer: Strongly Agree**

The proposal for three new unitary councils, Greater Peterborough, Mid Cambridgeshire, and Greater Cambridge represents a sensible approach incorporating key functional economic areas, established travel-to-work patterns, and long-standing community identities. There is a strong emphasis on the existing geographies and building on how residents already live, move, work, and access services. As explained below, we believe that “Cambridgeshire Fens Unitary Authority” would be a more appropriate name for the proposed “Mid Cambridgeshire Unitary Authority”.

These areas were originally identified in the 2018 Cambridgeshire and Peterborough Independent Economic Review (CPIER), which examined the region’s interconnected economic systems and identified three distinctive but complementary and genuine socio-economic regions. Therefore, this option builds directly upon an evidence-based model already recognised across the region.

In addition, the Cambridgeshire and Peterborough Combined Authority’s recently published Local Growth Plan (Dec 2025) demonstrates strong economic viability by harnessing the region’s world-leading innovation ecosystem, fast growing cities, dynamic market towns and highly productive Fen landscapes. Cambridge and Peterborough, two of the UK’s fastest growing cities, continue to drive high value growth, while market towns support business expansion and workforce access.

The Fens provide a nationally significant platform for Agri-Food, Clean Tech and advanced manufacturing development. The Local Growth Plan’s aim is for targeted opportunity zones, sector led investment, and major infrastructure upgrades to double or even triple the economy by 2050. Together, these strengths create a balanced, inclusive, innovation-driven growth model with substantial national impact.

The three geographies reflect natural patterns of housing demand, employment distribution, land use, public service access, and cultural identity. Market towns anchor the proposed Cambridgeshire Fens Unitary Authority area (Mid Cambridgeshire), Peterborough anchors the north, and Cambridge anchors the south, each providing a rational focus for local leadership. The geographies also align with daily resident behaviours such as commuting, school access, hospital use, and interaction with local services.

Greater Peterborough functions as a fast-growing urban-industrial hub centred around Peterborough but extending naturally into the A1 corridor and north and west Huntingdonshire. This geography is justified by strong commuter flows, shared employment markets, and aligned

regeneration opportunities. The geography chosen for Greater Peterborough reflects its role as a fast-growing city and economic hub and enhances the strategic corridor of the A1/A1(M).

Cambridgeshire Fens (Mid Cambridgeshire) is purposefully shaped around the rural areas and market-towns of Fenland, East Cambridgeshire and the eastern and southern parts of Huntingdonshire. This region shares a rural identity, a strong agricultural and food production economy, and similar challenges relating to transport access, digital connectivity, skills and service delivery across dispersed communities. An authority focused on these rural geographies enables tailored investment in agri-tech, food manufacturing, market-town renewal, and infrastructure improvements that reflect the lived experience of its residents.

The rationale behind Greater Cambridge has already been covered in Section B above.

Overall, the geographical design of Proposal 4 (Option D) is sensible, robust, evidence-driven, and responsive to both community identities and functional economic realities. It provides strong foundations for effective strategic planning, service delivery, and future growth.

**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?**

**Answer: Strongly Agree**

This proposal for three new unitary councils is built on a comprehensive, evidence-led approach, developed jointly by all seven existing councils and supported by independent external specialists. It draws on a robust shared dataset, extensive modelling, and comprehensive resident and stakeholder engagement, ensuring that the conclusions reached reflect the lived realities, priorities, and ambitions of communities across Cambridgeshire and Peterborough.

It sets out a detailed and realistic pathway for each of the three new unitary authorities to deliver positive outcomes, while acknowledging the very different challenges that each will need to manage. It creates a structure where each new authority can develop distinctive, locally aligned strategies for housing, regeneration, skills, transport, public health and social care, supported by strong local leadership and clearer accountability. It also reflects natural patterns of work, travel, service use, and local identity, creating authorities that are large enough to deliver sustainably, but local enough to remain connected and responsive.

By consolidating service responsibilities into single authorities for each geography, decision-making will become more direct, efficient, and transparent. Currently, residents often struggle to understand which tier of government is responsible for which services. Under a unitary model, simplified governance structures allow for faster decisions, improved accountability, and more coherent service strategies. This provides a solid foundation for

improvements in areas such as social care, housing, education, economic development, and environmental services.

While recognising that no option is without challenge, Proposal 4 (Option D) is designed to balance transformation with managed risk, ensuring that change strengthens rather than disrupts the delivery of essential services:

- It avoids the excessive scale and imbalance associated with a single large authority.
- It creates three councils of similar population size, reducing the risk of one dominating or overshadowing others.
- It aligns boundaries with real economic geographies, helping ensure investment is targeted where it has most impact.
- It removes current confusion caused by the two-tier system, replacing it with a clear single point of accountability for residents.
- It strengthens democratic visibility, local identity, and resident voice—critical concerns raised during engagement.
- It allows each authority to tailor services to the demographics, economic profiles, and needs of their communities. Greater Cambridge can focus on congestion, housing affordability and lab space, Greater Peterborough can prioritise regeneration and skills development, and Cambridgeshire Fens (Mid Cambridgeshire) can concentrate on rural connectivity, agri-tech innovation, and revitalising market towns.

Although transition costs are higher than in a two-unitary model, Proposal 4 (Option D) provides long-term strategic benefits: clearer accountability, more tailored service design, stronger local leadership and improved alignment to community identity. These are critical foundations for sustainable, effective public services.

**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?**

**Answer: Strongly Agree**

Proposal 4 (Option D) is underpinned by a comprehensive and independently tested financial model, demonstrating clearly that while transition costs are higher than in a two-unitary arrangement, it remains a credible, evidence-based and financially deliverable model. It is built on transparent, prudent assumptions and reflects real service costs, demand profiles, and revenue-raising capacity across the region.

A key strength of the model lies in the balanced scale of the three councils. It creates three authorities of broadly comparable population size, around 290,000 to 320,000 residents,

avoiding the extreme imbalance that would otherwise place disproportionate financial pressure on a single council. While the net annual saving of £1.4m and the higher one-off transition costs of £40.7m create a long payback period, the model still provides a stable platform for long-term financial sustainability through focused investment, service redesign, and targeted transformation within each new authority.

Each authority would be significantly larger than any existing district council, ensuring access to a sufficiently broad tax base and enabling economies of scale in functions such as procurement, ICT, finance, estates and governance. At the same time, none of the authorities would be so large as to dilute local identity. This balance supports more streamlined decision-making, stronger accountability, and more efficient service design.

This option clearly aligns with functional economic geographies and patterns of need, which is critical for managing medium and long-term financial viability, particularly given rising demand in adult social care, SEND and housing services across the region. Service levels for vulnerable children and adults need to be maintained, and aligning Unitaries which better reflect the functional geographies and social geographies of an area will be able to achieve more than having disjointed areas joined together artificially.

This alignment also has important financial advantages when disaggregating county-wide rural assets such as the Cambridgeshire County Council Farms Estate. Cambridgeshire Fen's (Mid Cambridgeshire's) rural identity ensures that estate-related revenues, such as tenancies, investment returns, and land value uplift, are retained within an authority where agriculture is central, improving its long-term financial sustainability. This overcomes rural income being absorbed into larger urban-dominated budgets, allowing more reinvestment in rural infrastructure, land management and agri-food economic growth. These direct benefits would be more closely aligned to the needs of Fenland's farming communities and rural economy.

By creating more coherent new Unitary Authorities, Proposal 4 (Option D) will promote better focused service delivery which will be responsive to the particular needs and opportunities in each new Unitary area. The result will be that it is more likely that there will be a set of Unitary Authorities which will work more effectively and which will therefore outperform the projected economic performance and sustainability currently assessed in the performance data analysis. Councils which are more coherent and better reflective of local communities of interest are likely to be more effective than those Councils which don't possess such coherence and focus.

**Question 4.** To what extent do you agree or disagree that the proposed councils will deliver high quality, sustainable public services?

**Answer: Strongly Agree**

The creation of three new unitary councils each shaped around coherent geographies, strong local identities, and functional economic footprints, offers clearer accountability and more

streamlined service delivery. By aligning councils with how communities actually live and access services, Proposal 4 (Option D) establishes a solid framework for delivering high-quality, sustainable public services.

The key strength is the shared characteristics. Cambridgeshire Fens (Mid Cambridgeshire) would bring together Fenland, East Cambridgeshire, and parts of Huntingdonshire, areas with predominantly rural, agricultural and market-town economies. This enables public services such as social care, transport, environmental management, and community health to be shaped around the realities of rural living. Tailoring services in this way improves sustainability, ensuring resources are directed where they are most needed and avoiding inefficient one-size fits all models.

The model also benefits from the strengths of each area. Greater Peterborough, with its existing unitary structure, can build on established systems and experienced officer leadership to enhance service quality, particularly in housing, social care, and regeneration. Greater Cambridge benefits from a strong revenue base and an evidence driven innovation culture that supports investment in high-value services and infrastructure. Cambridgeshire Fens (Mid Cambridgeshire) is positioned to deliver highly tailored, localised rural public services, better suited to dispersed communities than current county level arrangements.

Ensuring the three new councils have balanced population size enables more balanced authorities reduce the risk of overstretched or under-resourced councils and provide a stable foundation for long-term service planning. Equitable population distribution supports financial resilience, enabling each council to manage demand pressures, invest strategically, and maintain operational stability. These conditions are essential for sustainable and high-quality service delivery across key public functions.

Proposal 4 (Option D) also enhances sustainability through focused transformation. Because each new authority reflects distinct economic and social profiles, urban in Greater Peterborough, rural in Cambridgeshire Fens (Mid Cambridgeshire), and innovation-driven in Greater Cambridge. Public service transformation programmes can be designed with clearer strategic direction. This reduces duplication, avoids fragmentation, and allows each council to modernise services based on local priorities such as digital access, integrated care models, environmental sustainability, and housing growth.

Proposal 4 (Option D) is the only Option listed which does not include both Fenland and Peterborough in the same Unitary Authority. In terms of sustainability, it is inappropriate to load both of the most deprived Council areas in the CPCA area within the same proposed new Unitary Council

According to the 2019 Index of Multiple Deprivation, Peterborough was the 53rd most deprived local authority area in England (out of 317), with Fenland being the 51st most deprived. The recently published 2025 IMD data shows that the position has become worse in that (out of 296

local authorities in England) Peterborough is now the 51st, and Fenland is now the 42nd, most deprived local authority area in England.

Putting the two most deprived Cambridgeshire & Peterborough Council areas into one new Unitary authority would create a new Authority with a depth of deprivation so great as to be a millstone around that Authority's neck. Only Proposal 4 (Option D) avoids that unsustainable combination.

**Question 5.** To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?

**Answer: Strongly Agree**

Proposal 4 (Option D) has been shaped through a collaborative, evidence-led process that places local views, community identity and real-world needs at the centre of decision making. This foundation ensures that this structure proposed is built from the ground up, informed by the people who use services every day.

The business case demonstrates extensive engagement across residents, staff, parish councils, businesses, MPs, and public-sector partners. More than 2,400 residents, 767 staff, dozens of stakeholders, and numerous community organisations participated in consultation activities.

Across the engagement, the views of residents, businesses, partners and councils were consistent. The key themes of what local people want from reorganisation are:

- **Value for money, efficiency and simplicity**

Residents expressed a strong appetite for simpler structures that reduce duplication and improve coordination. Proposal 4 (Option D) delivers this by removing the two-tier complexity and replacing it with balanced, coherent unitary councils.

- **To protect what works**

Stakeholders emphasised the importance of preserving trusted, high-performing services and partnership arrangements. Proposal 4 (Option D) achieves this by grouping areas along functional geographies, urban, rural, and innovation led, while avoiding the extreme size or fragmentation seen in other models.

- **To avoid fragmentation**

People want continuity, clear accountability and fair access. Proposal 4 (Option D) minimises service disruption by creating three balanced councils with coherent boundaries, reducing the risk of residents "falling between the cracks."

- **Single Council**

If residents want a single, accountable council for their area, Proposal 4 (Option D) fulfils this by making each new authority responsible for all local services, ending any confusion there may be in the current two-tier system.

- **To stay rooted in communities**

Local identity is a driving force. Proposal 4 (Option D) reflects meaningful places, Greater Peterborough, Cambridgeshire Fens (Mid Cambridgeshire) and Greater Cambridge, all aligned to how people live, work, and access services.

Proposal 4 (Option D) is the only proposal that fully incorporates the distinct identities and needs of the region's diverse communities. Residents consistently value their towns, villages, heritage and environment. Proposal 4 (Option D) aligns councils to these lived geographies and creates structures that protect local identity while enabling strong, responsive service delivery

Partners emphasised the importance of aligned coherent boundaries for strong collaboration. Proposal 4 (Option D) achieves this by creating three well-defined authorities that match functional geographies and established partnerships. Aligned structures support joined-up delivery with the NHS, police, education and other agencies, improving responsiveness and reducing system complexity.

It is also reflected in the way that community transport has organically developed in the CPCA area. There are three Community Transport operations in the area, fairly closely following the proposed boundaries of the three proposed new Unitary Authorities in Proposal 4 (Option D).

**Question 6. To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements?**

**Answer: Strongly Agree**

Proposal 4 (Option D) makes an excellent justification that three councils of similar sizes will significantly strengthen the region's readiness for deeper devolution. The current seven councils, with varying tiers, create imbalances within the Combined Authority, complicates governance, and can limit consistent strategic leadership.

A main advantage of Proposal 4 (Option D) is its creation of three balanced unitary authorities. These align with established travel-to-work areas, community identities, economic profiles and local service patterns. Under devolution, powers relating to transport, planning, skills, economic development and infrastructure must be exercised across boundaries that reflect how communities and economies function. Proposal 4 (Option D) delivers this by grouping urban, rural and innovation led localities into coherent units. Greater Peterborough is shaped around urban regeneration needs, Cambridgeshire Fens (Mid Cambridgeshire) reflects rural and agricultural communities, and Greater Cambridge supports globally significant innovation and growth sectors. This structure enables each council to design developed programmes that are

genuinely place based. It also supports a more resilient regional system capable of delivering the full breadth of devolved responsibilities.

The balanced scale of the three proposed councils directly supports fair and effective representation within the Combined Authority. Authorities of similar size reduce the risk of one council dominating decision-making, strengthen democratic legitimacy and ensures shared responsibility for strategic regional priorities. This balanced governance environment is essential for delivering devolved responsibilities collaboratively and transparently.

Effective devolution depends on closely aligned boundaries between councils and key public service partners such as the NHS, police, education providers and transport bodies. The Government's consultation highlights the importance of such alignment for integrated, efficient and responsive public service delivery. The coherent boundaries proposed under Proposal 4 (Option D) support these relationships by reducing system complexity and creating stable geographic footprints for long-term collaboration. Community transport is one example that has already successfully been developed in the CPCA area.

**Question 7. To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment?**

**Answer: Strongly Agree**

Proposal 4 (Option D) offers a model that is fundamentally shaped around local identity, community voice and place-based decision-making. From the outset, the proposal has been directly informed by the views of residents, local councils and stakeholders.

This model closely reflects the identities, service needs and expectations of their communities. This demonstrates that Proposal 4 (Option D) is rooted in real community sentiment and is not a top-down concept imposed without local buy-in. Instead, it acknowledges the importance of designing councils that reflect lived geographies, everyday service journeys and the sense of place valued by local people.

Proposal 4 (Option D) supports stronger community engagement by providing clearer democratic accountability. The current two-tier system often leads to confusion about which council is responsible for which service. Under Proposal 4 (Option D), each community has one directly accountable council responsible for all local services, enabling more transparent decision making and more meaningful resident influence. When communities can clearly see who is responsible, it becomes easier for them to engage, challenge decisions, participate in consultations and hold leaders accountable. This clarity is essential for developing confident local democracy and more empowered neighbourhoods.

A major reason Proposal 4 (Option D) strengthens community engagement is the way in which it creates three coherent unitary authorities aligned with functional economic areas, natural

communities and shared social characteristics. For Cambridgeshire Fens (Mid Cambridgeshire), this means that local voices can meaningfully influence decisions on transport, housing, local services and economic development that are tailored to their everyday realities. This alignment provides a structural basis for enhanced neighbourhood empowerment because communities do not have to compete with large, unrelated urban areas for attention, investment or representation.

This place based design also encourages councils to develop policies that reflect local priorities, whether urban regeneration, rural connectivity, market-town revitalisation or environmental resilience. This targeted approach allows communities to shape the future of their areas more directly, supporting deeper empowerment and stronger local participation.

Proposal 4 (Option D) also enhances the visibility and accessibility of councillors. Smaller authorities with defined geographies allow councillors to be more connected to their communities, improving trust and engagement. Engagement findings revealed that residents want councillors with strong local knowledge; the proposed geographies reflect communities that share identity, culture, and daily life patterns, making it easier for representatives to advocate effectively.

**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 combination of Fenland, East Cambridgeshire and the southern and Eastern parts of Huntingdonshire into one new Unitary Authority uniquely unites areas of fen market towns (with their rural hinterlands) under one Authority. There is a strong community of interest across the area. We believe that this proposed new Unitary Authority area should be named the “Cambridgeshire Fens Unitary Authority” (CFUA) rather than “mid-Cambridgeshire” to better reflect that common heritage.

The proposed CFUA area consists of many market towns set within historical natural peat fen areas, from north to south. Active water management is a common theme running through the whole area, which goes beyond (but includes) flood prevention. There are numerous IDBs (Internal Drainage Boards) throughout the CFUA area, and the local authority has statutory nomination rights to membership of these IDBs (in the market town areas, these are mostly majority nomination rights on those IDBs).

Fenland District Council Councillors currently sit on 21 different Internal Drainage Boards, with a total of 95 representatives. Total cost of IDB’s in 2025/2026 for Fenland District Council was £2,242,621, with a Government grant funding £520,000 of that cost.

Therefore, significantly more than 100 such nominations would be required from a new CFUA local authority. In terms of concentration of separate IDBs, the CFUA would cover a uniquely

dense concentration of separate IDBs within its boundaries. Councillors appointed to these IDBs play a vital part in the water management governance of the Cambridgeshire Fens, and this provides a reason why a greater number of councillors is needed in the CFUA area than in other proposed new Unitary Authorities covering a similar population size.

The proposed CFUA area reflects a unique congruence of communities, water management and shared local economic challenges and opportunities. Its largest town (St Neots) has a population of significantly under 40,000. The rurality of the area, and its unique combination of fen market towns and their village hinterlands, creates a geographical web of local independent towns in a pattern unique in the country. Historically, this reflects the geography of the area, dominated by artificial water management systems for almost four hundred years. The need to reflect that history and pattern of communities, together with the comparative rurality of the CFUA area without any large individual settlement, means that the CFUA area will always require a lower elector to councillor ratio to operate effectively. That need is exacerbated by the uniquely high number of councillors who need to be appointed by the Local Authority to the numerous independent IDBs across the CFUA Area. We recognise that there will need to be a review of electoral arrangement by the LGBCE for all new Unitary Authorities shortly after they are created, and we believe the unique challenges and opportunities provided by the social, economic and water management geography of the CFUA would justify a long-term Council size of approximately 72. But we also recognise the additional difficulties and challenges that will be faced by all new Unitary Authorities when they are first constituted (especially with continuity of experience and knowledge from councillors who had previously served the area on the soon to be defunct County and District Councils) and that, across the county, the initial Council size of the new Unitary Authorities will therefore need to be greater than the long-term Council sizes required in those Authorities. We also recognise the challenge of setting up a pattern of warding across all the new Unitary Authorities which is based on existing Wards and/or Divisions, but which avoids substantial electoral inequalities within their new area whilst accurately reflecting the electorates of the old authorities which will be joined together in the new Unitary Authorities.

In Cambridgeshire & Peterborough the current local authorities have worked collaboratively to provide data based on a consistent dataset to Government in relation to their LGR proposals. So far as electoral arrangements are concerned, that dataset consists of the published electorates for each Ward and Division in the area as of June 2025.

Using that common June 2025 data, the electorate in the CFUA area under Proposal 4 (Option D) was 235,820. This consisted of the following electorates from each of the three existing District Councils from which the CFUA would be formed:

East Cambridgeshire 68,825 (29.2%)

Fenland 76,695 (32.5%)

Huntingdonshire 90,300 (38.3%)

It is our view, considering the unique challenges already mentioned in the CFUA area, that an initial Council Size of 97 would be sufficient to achieve the continuity, adequate level of

representation, and number of councillors needed to service the area's unique concentration of Internal Drainage Boards to which appointments need to be made. As previously stated, we believe that an initial review of electoral arrangements in 2028 should reduce that number of 97 for future elections to 72. Such a reduction is very much in line with what has happened elsewhere on unification, such as in Durham and in Buckinghamshire.

If the CFUA were initially to have 97 elected members, the proportionate entitlement each of the existing District Council areas would have would be:

East Cambridgeshire 28.31

Fenland 31.55

Huntingdonshire 37.14

We therefore propose that an initial CFUA Council size of 97 should be split as follows: 28 from East Cambridgeshire, 32 from Fenland and 37 from Huntingdonshire.

Given our electoral geography, it makes sense to use existing District Council Wards as the building blocks for the first election to the Shadow CFUA which we assume will take place in May 2027. The smaller number of electors in the Wards as opposed to in the area's County Council Divisions makes it easier to avoid unnecessarily large electoral inequality. Moreover if, as we understood from Secretary of State Steve Reed, the scheduled 2027 elections to Fenland District Council and to East Cambridgeshire District Council are still going ahead, it would create potentially chaotic conflicts for both election staff and for electors if (simultaneously with scheduled Town & Parish elections) elections were to be held on the same day for existing District Councils using District Council Ward boundaries whilst using County Council Division boundaries for elections to the shadow Unitary Authority.

Accordingly, we recommend using existing District Ward boundaries for the election in 2027 to the Shadow Unitary Authority.

In East Cambridgeshire there is a current warding pattern supporting the election of 28 District Councillors to East Cambridgeshire District Council. We therefore propose that the same pattern of wards, and the same number of councillors per ward as currently exists, be used to create the warding arrangement for the 2027 Shadow Unitary Authority election.

In Fenland there is a current warding pattern supporting the election of 43 District Councillors to Fenland District Council. We therefore propose that, subject to the following amendments, the same pattern of wards, and the same number of councillors per ward as currently exists, be used to create the warding arrangement for the 2027 Shadow Unitary Authority election.

In Fenland the current ratio of electors to elected District Councillors is significantly lower than elsewhere in Cambridgeshire & Peterborough. As a result, the electorates in the two single-member Fenland District Council Wards (Whittlesey Lattersey and Wisbech North) would be too small to avoid unreasonable electoral inequality if those two wards were to be used unaltered in the Shadow CFUA elections in 2027. We therefore propose combining the existing Whittlesey

South and Whittlesey Lattersey Wards for the Shadow Authority election (creating a “Whittlesey South & Lattersey Ward”) and similarly combining the existing Wisbech North and Wisbech Riverside Wards into a new “Wisbech North and Riverside Ward”.

The current councillor number of 43 in Fenland District Council therefore needs to be reduced to an elected councillor number of 32 for the Shadow CFUA elections. In order to minimise electoral inequality, we propose reducing the number of councillors currently elected from each of the following 11 wards/ward combinations, which currently have the lowest elector to councillor ratios:

March South

Whittlesey South & Lattersey

Chatteris South

Wisbech Walsoken & Waterlees

March East

Leverington & Wisbech Rural

Parson Drove & Wisbech St Mary

Wisbech North & Riverside

Whittlesey East & Villages

Wisbech South

March West & Benwick

In that part of Huntingdonshire which is proposed under Proposal 4 (Option D) to fall within the boundary of the CFUA, there is a current warding pattern supporting the election of 33 District Councillors to Huntingdonshire District Council. We therefore propose that the same pattern of wards, and the same number of councillors per ward as currently exists, be used to create the warding arrangement for the 2027 Shadow Unitary Authority election, with the exception that the four current wards in the relevant part of Huntingdonshire with the highest elector to councillor ratio each be allocated one additional councillor to be elected from that ward, taking the number of councillors from 33 to the required 37. Those four wards are:

Fenstanton

St Ives South

St Neots Eynesbury

Warboys

The electoral proposals detailed above in respect of East Cambridgeshire, Fenland and Huntingdonshire would result in a fair allocation of members to the new CFUA whilst minimising electoral inequality.

**Question 9. This is a proposal that is accompanied by a request that the Secretary of State considers a boundary change(s) 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?**

**Answer: Strongly Agree**

The proposal provides clear, detailed reasoning for the boundary changes, particularly regarding the division of Huntingdonshire, grounded in service delivery needs, economic geography, and financial sustainability. The business case demonstrates that maintaining existing boundaries would create misalignments between service demands, economic patterns, and local identity, limiting the ability of new authorities to deliver coherent and sustainable services.

For Greater Peterborough, including the northern and western parts of Huntingdonshire strengthens the authority's capacity to manage growth, regeneration, and service pressures by bringing in communities that share strong transport, employment, and service links with the city. This adjustment supports more efficient planning, reduces service fragmentation, and creates a more manageable geography for high-demand services such as adult social care and children's services.

For Cambridgeshire Fens (Mid Cambridgeshire), the inclusion of eastern and rural Huntingdonshire realigns communities with similar rural characteristics, agricultural economies, and market-town service patterns. This reduces fragmentation and supports more equitable and sustainable delivery of rural services.

For Greater Cambridge it unifies a globally significant innovation ecosystem. These boundaries are not uninformed, they directly reflect how communities live, travel and work. When authorities align with real-world patterns, councils can plan more efficiently, respond more effectively and ensure local needs are met.

## Section D: Proposal 1 (Option B)

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

**Answer: Strongly Disagree**

Proposal 1 (Option B) merges areas with fundamentally different functional economies, social needs profiles, and identity structures. The northern unitary would combine Peterborough, Fenland, Huntingdonshire and East Cambridgeshire, areas that have different economic bases, including high-value logistics and manufacturing in Peterborough versus small-scale rural services and agriculture in the Fens.

Proposal 1 (Option B) prioritises theoretical economic balance at the expense of functional geographies, local identity, and established economic patterns.

District and rural areas expressed clear fears of being overlooked or forgotten under larger unitary structures. The proposal reports that residents in rural areas were worried about being “overlooked or left behind,” and were concerned their interests would be dominated by the larger urban centre of Peterborough.

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?**

**Answer: Strongly Disagree**

We do not agree that the proposed councils would be able to deliver the outcomes they describe. The proposal depends on highly optimistic assumptions about financial savings, ICT integration and rapid organisational redesign, despite all Councils, in particular Cambridgeshire and Peterborough, experiencing significant financial pressures and rising statutory service demand. The expectation that two newly created councils could deliver £42.8m annual savings and repay £57.4m in transition costs within four years is not supported by sufficiently robust evidence. This also highlights potential risks for the scale of transition, including ICT, workforce, finance and service continuity.

Many of the proposed service improvements rely on future delivery models that are untested at this scale. There is public and stakeholder apprehension from Fenland, East Cambridgeshire and Huntingdonshire about being overshadowed within large new councils. New engagement mechanisms remain untested and may not compensate for reduced representation.

**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?**

**Answer: Strongly Disagree**

We do not agree that the proposed councils under Proposal 1 (Option B) are the right size to guarantee efficiency, increased capacity, or long-term financial resilience. Although the proposal claims financial stability, it also acknowledges that both Cambridgeshire and Peterborough face serious and immediate financial pressures, including high demand for adult and children's social care, SEND, homelessness, and historically fragile reserves, particularly in Peterborough.

Expecting two newly formed authorities to rapidly deliver large-scale savings, harmonise systems, and absorb major structural change while handling these existing pressures is unrealistic.

The proposal relies heavily on significant transformation, ICT replacement, workforce restructuring, and new service models to achieve projected savings, yet these enablers are not fully designed, tested, or costed, creating substantial delivery risk.

The scale of the northern authority (612,000 residents) risks creating an organisation too large and complex to manage efficiently, making it very difficult effectively to manage the expectations and needs of the quite disparate communities in that large area.

Also, the proposal's own modelling shows undue reliance on balanced economic growth, stable tax bases, and joint commissioning, all of which are quite uncertain.

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

**Answer: Strongly Disagree**

We do not agree that the proposed councils under Proposal 1 (Option B) will be able to deliver high-quality, sustainable public services. The proposal itself highlights that both Cambridgeshire and Peterborough already face significant financial and service pressures, including rising demand in adult social care, children's services, SEND, and homelessness, as well as structural financial stress, particularly in Peterborough.

Option B includes both Fenland and Peterborough in the same Unitary Authority. In terms of sustainability, it is inappropriate to load both of the most deprived Council areas in the CPCA area within the same proposed new Unitary Council

According to the 2019 Index of Multiple Deprivation, Peterborough was the 53rd most deprived local authority area in England (out of 317), with Fenland being the 51st most deprived. The

recently published 2025 IMD data shows that the position has become worse in that (out of 296 local authorities in England) Peterborough is now the 51st, and Fenland is now the 42nd, most deprived local authority areas in England.

Putting the two most deprived Cambridgeshire & Peterborough Council areas into one new Unitary authority would create a new Authority with a depth of deprivation so great as to be a millstone around that Authority's neck. This would be exacerbated by the different nature of deprivation in the two areas; in Peterborough there is a predominance of traditional "inner-city" type deprivation, whereas in Fenland deprivation is far more rurally based.

Also, expecting the proposed northern super-Council to stabilise and improve these services while simultaneously undergoing major organisational restructuring is unrealistic.

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

**Answer: Strongly Disagree**

We do not agree that the proposal has been adequately informed by local views or that it will meet the diverse needs of communities across Cambridgeshire and Peterborough. The proposal itself highlights significant concerns raised by residents, where many fear being overlooked or overshadowed within the new structures by a larger Council.

Public engagement results also show concerns between the desire for efficiency and the desire for local identity and responsiveness. While some residents supported change, many, especially in rural areas are worried about losing local voice, weaker representation, and reduced understanding of local priorities. Stakeholders also warned of the risk of communities feeling remote from decision-making and expressed concerns about continuity of services during transition.

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

**Answer: Strongly Disagree**

We do not agree that the proposed new councils will effectively support future devolution arrangements. While the proposal claims that creating two unitary authorities will lead to "balanced" representation within the Combined Authority, it also acknowledges substantial disparities in population size, levels of need, and service pressures between the northern and

southern councils. These imbalances risk creating tensions rather than enabling coherent regional leadership.

Also, the proposal assumes that both new councils will have the capacity, stability, and financial resilience required to take on expanded devolved powers, yet both Cambridgeshire and Peterborough currently face significant financial stress, rising demand, and structural pressures that undermine the foundation needed to manage devolved responsibilities effectively.

Additionally, the transition period, requiring extensive restructuring, staff transfers, ICT integration, and service disaggregation, creates a high risk of distraction from strategic regional collaboration at precisely the moment when clear governance would be most required.

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

**Answer: Strongly Disagree**

We do not agree that the proposal provides convincing evidence that the new councils will deliver stronger community engagement or meaningful neighbourhood empowerment. The proposal repeatedly acknowledges significant concern among residents about losing local influence, with residents fearing their interests would be overlooked under the proposed structures.

Instead of addressing these concerns through clear governance guarantees, the proposal relies heavily on the creation of Resident Engagement Pathways (REPs), yet these are not defined in detail and remain entirely dependent on future design work.

The proposal reduces the number of councillors by over 40%, creating much larger wards and inevitably increasing the distance between residents and their elected representatives, a change that many stakeholders already warned could weaken accountability and responsiveness rather than strengthen it. This is also a major concern for rural communities and residents.

The document also acknowledges that residents in rural areas fear being overshadowed by urban centres yet provides no clear mechanisms to guarantee that rural voices and needs will be protected in decision-making.

## Section E: Proposal 2 (Option A)

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

**Answer: Strongly Disagree**

We do not agree that Proposal 2 (Option A) creates councils based on sensible geographies or economic areas. Although the proposal argues that Proposal 2 (Option A) reflects functional economic geographies, the evidence shows significant misalignment between the proposed boundaries and the real social, economic and service-use patterns of local communities. Many of the proposed boundaries cut across real community and economic patterns rather than reflecting them. Huntingdonshire also exhibits split identity, with its southern areas not oriented towards Peterborough while its northern areas look towards Peterborough, making it impossible for a single, cohesive economic geography to be formed within the proposed structures.

Economically, this Northwest Unitary would inherit high levels of deprivation, weaker employment rates and lower GVA, while the Southeast Unitary contains the economically dominant Greater Cambridge area, but with East Cambridgeshire anomalously added on. This imbalance risks creating two councils with fundamentally different capacities to raise revenue and deliver services, undermining the claim of “economic sensibility.”

The proposal also acknowledges significant rural/urban tensions, fears of overlooked communities, and concerns from 71% of residents about losing local identity, particularly in Fenland, East Cambridgeshire and Huntingdonshire. These concerns demonstrate that Option A’s boundaries do not reflect how people perceive or use their local area.

Proposal 2 (Option A) appears to prioritise administrative balance over genuine geographic and economic coherence, meaning the proposed unitaries cannot reasonably be described as sensible or community-aligned.

Every Council in the area bar one appreciates that East Cambridgeshire does not belong in Greater Cambridgeshire. Section B, above, explains why Greater Cambridge must continue to comprise solely of Cambridge City Council and South Cambridgeshire.

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?**

**Answer: Strongly Disagree**

We do not agree that the proposed councils will be able to deliver the outcomes described in the Proposal 2 (Option A) proposal because the evidence shows significant structural, financial and operational risks that undermine the likelihood of achieving those ambitions. The proposal

itself highlights major transition risks, including the complex disaggregation and aggregation of high-risk services such as adult and children’s social care, SEND, homelessness and housing. These are areas where service failure would have serious consequences for vulnerable residents. These transitions introduce risks of service disruption, loss of continuity, and reduced quality, especially during the first years of implementation.

Financially, Proposal 2 (Option A) councils inherit substantial legacy debt, face high transition costs and must manage recurring additional costs arising from reorganising service delivery structures. The Northwest Unitary Council would also absorb most of the area’s deprivation, raising doubts about its ability to raise income and deliver high-quality preventative services at the scale promised.

The proposal also depends heavily on the successful integration of data, digital systems, and partnership structures, yet the evidence warns that inadequate system consolidation, misaligned governance, and inconsistent local identity could weaken collaboration and diminish the intended “place-based” model.

**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?**

**Answer: Strongly Disagree**

We do not agree that the proposed councils are the right size to deliver efficiency, resilience, and financial stability because the evidence presented in the proposal highlights several structural and financial weaknesses that contradict this claim. While Proposal 2 (Option A) aims to create two councils with populations of around 420,000 and 520,000, the proposal itself acknowledges significant financial pressures, including a strained operating environment, rising demand, and major legacy debt, particularly from Cambridgeshire County Council and Peterborough City Council. These pressures will immediately constrain the new council’s ability to withstand financial shocks.

The financial modelling shows high transition costs of £34.4 million and a six-year payback period, meaning efficiencies are slow to materialise and vulnerable to disruption. The proposal also notes that disaggregating complex services (such as social care, SEND and public health) will introduce additional recurring costs and service-delivery challenges, undermining efficiency rather than improving it.

The new Northwest Unitary Council would inherit the majority of the area’s deprivation, which brings higher service demand and weaker income-raising capacity. This imbalance raises doubts about whether a council of this size can maintain financial resilience and sustain pressures forecast to rise significantly.

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

**Answer: Strongly Disagree**

We do not agree that the proposed councils will be able to deliver high-quality, sustainable public services because the proposal itself highlights substantial risks that undermine this claim. The most significant concern is the complex disaggregation and aggregation of critical services—including adult social care, children’s services, SEND, housing, and homelessness—which introduces clear risks of service disruption, fragmentation, and reduced quality, particularly during transition. The proposal acknowledges that disaggregating county-wide services into two new operational structures increases the likelihood of service failure for vulnerable people.

Financial pressures further undermine sustainability. The proposal notes that both existing upper-tier councils already face wide-ranging budget deficits, rising demand, and higher complexity of need—particularly in adult social care, SEND, and homelessness. Proposal 2 (Option A) adds £34.4m in transition costs and substantial recurring costs from reorganising service teams, placing additional strain on already fragile systems.

Proposal 2 (Option A) includes both Fenland and Peterborough in the same Unitary Authority. In terms of sustainability, it is clearly inappropriate and counter-productive to load both of the most deprived Council areas in the CPCA area within the same proposed new Unitary Council

According to the 2019 Index of Multiple Deprivation, Peterborough was the 53rd most deprived local authority area in England (out of 317), with Fenland being the 51st most deprived. The recently published 2025 IMD data shows that the position has become worse in that (out of 296 local authorities in England) Peterborough is now the 51st, and Fenland is now the 42nd, most deprived local authority area in England.

Putting the two most deprived Cambridgeshire & Peterborough Council areas into one new Unitary authority would create a new Authority with a depth of deprivation so great as to be a millstone around that Authority’s neck.

Also, expecting two newly created councils to stabilise and improve these services while simultaneously undergoing major organisational restructuring is unrealistic.

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

**Answer: Strongly Disagree**

We do not agree that the proposal has been sufficiently informed by local views or that the proposed councils will meet local needs, because the evidence in the document shows clear

gaps between community feedback and the final proposal. The proposal itself reports widespread concern about being overlooked, with 71% of residents expressing fears that their community would not be properly considered in Local Government Reorganisation, rising to 81% in rural areas such as Fenland and East Cambridgeshire, yet these anxieties are not reflected in the final design of Proposal 2 (Option A).

Huntingdonshire in particular demonstrates deep identity divisions, with northern communities orientating socially and economically toward Peterborough, while southern communities don't. Despite this, the proposal assigns the entire district to the Northwest Unitary, ignoring residents' concerns that the arrangement does not reflect their lived experience.

Stakeholder concerns also point to risks that local needs will not be met: VCSE partners highlighted deprivation and rurality issues, parish councils raised doubts about meaningful representation, and many respondents feared rural communities would lose influence.

The engagement evidence demonstrates significant unresolved concerns, suggesting Option A does not reflect local views and is unlikely to meet the diverse needs of communities across the area.

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

**Answer: Strongly Disagree**

We do not agree that the proposed councils will support devolution arrangements because the evidence in the proposal shows that key structural, geographic and partnership misalignments would undermine rather than strengthen the region's strategic governance.

The proposal acknowledges significant tensions in local identity, demand pressures and financial resilience, all of which risk weakening the ability of the new councils to collaborate effectively with the Mayoral Strategic Authority (CPCA). The Northwest Unitary would inherit the highest levels of deprivation, escalating demand and weaker income-raising capacity, creating an uneven platform for partnership working, contrary to the goal of balanced, effective devolution structures.

The proposal aligns with existing ICS health geographies, however, it highlights deep concerns about misaligned community identity, raising the risk of fractured local priorities and inconsistent engagement with CPCA-level strategies. This undermines the requirement for coherent, stable governance arrangements that devolution depends upon.

Operational risks also threaten the capacity of new councils to contribute meaningfully to devolution. The document identifies governance instability, workforce disruption, digital integration risks and procurement uncertainties, all of which could compromise strategic

coordination with the CPCA as well as the delivery of shared responsibilities such as infrastructure, skills, and public service reform.

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

**Answer: Strongly Disagree**

We do not agree that the proposal enables stronger community engagement or delivers genuine neighbourhood empowerment because the evidence within the document shows persistent concerns about local identity, representation and trust, issues the proposal does not resolve. The engagement findings show widespread fear of communities being overlooked, with *71% of residents* expressing concern, rising to *81% in rural areas such as Fenland and East Cambridgeshire*. These anxieties demonstrate that residents do not feel empowered or confident that their voices will shape the new arrangements.

The proposal highlights major identity mismatches, especially in Huntingdonshire, where northern communities identify more with Peterborough and southern areas don't. Proposal 2 (Option A) nevertheless places the whole district in one unitary, despite residents' clear concerns that this does not reflect their lived experience or community connections. This undermines neighbourhood-level legitimacy before the new structures even begin.

Additionally, while the proposal promotes the idea of Neighbourhood Area Committees (NACs), these structures are not developed in detail, and there is no clear evidence that they would be given meaningful powers beyond consultation. This raises doubts about whether NACs can truly influence decision-making rather than act as symbolic bodies without authority.

The engagement evidence demonstrates unresolved concerns, weak trust, and mismatched identities, conditions that fall far short of enabling stronger community engagement or genuine neighbourhood empowerment.

## Section F: Proposal 3 (Option E)

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

**Answer: Strongly Disagree**

We disagree that Proposal 3 (Option E) is based on sensible geographies and economic areas because the boundaries it proposes are inconsistent, imbalanced, and in several cases misaligned with the functional economic relationships described in the evidence base.

Proposal 3 (Option E) actually creates highly uneven councils, with population sizes ranging from 185,750 in Huntingdonshire to 424,864 in the North-East unitary, far outside government guidance and creating structural imbalances.

The Huntingdonshire unitary still depends heavily (in its northern section) on travel into Peterborough for work and services patterns that contradict the rationale for separating it from both economic centres.

The North-East unitary combines very different economies. Peterborough's high-need urban environment and Fenland and East Cambridgeshire's rural, ageing, low-productivity areas, creating a spread of needs and economic conditions that weakens the case for it being a functional economic area.

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?**

**Answer: Strongly Disagree**

We do not agree that the proposed councils in Proposal 3 (Option E) will be able to deliver the outcomes they describe because the evidence within the proposal itself highlights substantial capacity, financial, and operational risks that undermine its claims. The proposal repeatedly acknowledges that two of the three new councils, Huntingdonshire and the South-West unitary, lack the scale required to generate sufficient savings, with one expected to face a recurring cost pressure rather than any financial benefit from reorganisation. This directly challenges the claim that the model can sustainably improve outcomes.

The proposal also notes that smaller authorities face limited economies of scale, workforce shortages, and challenges recruiting specialist expertise, further reducing their ability to deliver the transformative outcomes described. Huntingdonshire, in particular, is highlighted as having lower containment rates, limited capacity and weaker resilience, raising doubts about its ability to operate as a standalone public service provider.

The proposal also confirms that projected savings depend on significant transformation work, yet it provides no evidence that the smaller councils will have the resources, scale or stability needed to deliver such change. Overall, the proposal's own data shows that Option E creates councils structurally ill-equipped to deliver the improved outcomes it promises.

**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?**

**Answer: Strongly Disagree**

We do not agree that the proposed councils in Proposal 3 (Option E) are the right size to achieve efficiency, build capacity or withstand financial shocks because the proposal itself highlights significant risks arising from their scale. Most notably, the Huntingdonshire unitary is too small to deliver the expected efficiencies. The financial analysis state that that very small Council is unlikely to generate sufficient savings to recover transition costs within five years and that it is likely to face a recurring cost pressure due to its scale. This directly contradicts the claim that the new councils will be financially resilient.

The proposal acknowledges that this structure “negatively impacts sustainability,” especially for smaller councils with limited workforce depth or specialist capacity. It also admits that Huntingdonshire lacks the scale and critical mass required for long-term resilience, with its ability to withstand shocks dependent on speculative future growth and potential boundary changes.

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

**Answer: Strongly Disagree**

We do not agree that the councils proposed under Proposal 3 (Option E) will be able to deliver high-quality, sustainable public services, because the proposal itself identifies structural weaknesses that undermine this claim. Proposal 3 (Option E) acknowledges that two of the three councils, Huntingdonshire and the South-West unitary, lack the scale and economies required for sustainable delivery. This directly challenges the ability of these authorities to fund, staff and sustain high-demand services such as adult social care, children's services, SEND and homelessness.

Additionally, Proposal 3 (Option E) recognises that smaller councils face workforce shortages, recruitment challenges and limited specialist capacity, which are already pressures within social care, SEND, and children's safeguarding. These weaknesses reduce the resilience of services and make it harder to maintain quality, let alone improve it.

Proposal 3 (Option E) includes both Fenland and Peterborough in the same Unitary Authority. In terms of sustainability, it is inappropriate to load both of the most deprived Council areas in the CPCA area within the same proposed new Unitary Council

According to the 2019 Index of Multiple Deprivation, Peterborough was the 53rd most deprived local authority area in England (out of 317), with Fenland being the 51st most deprived. The recently published 2025 IMD data shows that the position has become worse in that (out of 296 local authorities in England) Peterborough is now the 51st, and Fenland is now the 42nd, most deprived local authority area in England.

Putting the two most deprived Cambridgeshire & Peterborough Council areas into one new Unitary authority would create a new Authority with a depth of deprivation so great as to be a millstone around that Authority's neck.

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

**Answer: Strongly Disagree**

We do not agree that Proposal 3 (Option E) has been meaningfully informed by local views or that it will meet local needs, because the proposal itself reveals substantial gaps in engagement and alignment with community priorities. Most notably, Proposal 3 (Option E) was not included in the original public engagement exercise carried out across the region. This means residents were not asked whether they supported this proposal, therefore there is no robust evidence that the model reflects residents' views.

Furthermore, while the proposal claims Proposal 3 (Option E) responds to place identity, it also concedes that Huntingdonshire's connection to Peterborough and Cambridge would be severed, despite commuting, service-use and economic data showing strong northward and southward links that local people rely on. It also recognises that smaller councils may struggle to sustain service quality due to limited capacity, directly conflicting with residents stated priorities for accessible, reliable services.

Altogether, the absence of direct engagement, the lack of demonstrated resident endorsement, and the proposal's own admissions about service and capacity risks show that Proposal 3 (Option E) is not well-informed by local views and is unlikely to meet local needs.

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

**Answer: Strongly Disagree**

We do not agree that proposal 3 (Option E) would support devolution arrangements because the proposal itself highlights several structural and geographic weaknesses that undermine its ability to contribute effectively to a Strategic Mayoral Authority. While Proposal 3 (Option E) claims three unitary councils would provide “balance” on the Combined Authority board, the document also acknowledges that they would represent significantly different population sizes, with Huntingdonshire in particular lacking the scale and capacity to influence regional decision-making. The proposal concedes that smaller councils will have less capacity to influence funding decisions, which is a direct barrier to effective devolution.

The proposal also highlights that Proposal 3 (Option E) councils, particularly Huntingdonshire and the South-West unitary, face risks around scale, resilience and financial sustainability, which could weaken their ability to participate effectively in strategic regional initiatives. The proposal admits that at least one council may face a recurring cost pressure, further limiting its ability to engage meaningfully in shared devolution priorities.

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

**Answer: Strongly Disagree**

We do not agree that the proposal set out in Proposal 3 (Option E) will enable stronger community engagement or meaningful neighbourhood empowerment because the evidence within the document reveals several contradictions and weaknesses. Most importantly, Proposal 3 (Option E) was not included in the formal public engagement process. This means communities had no opportunity to comment on the model that is now being proposed. As a result, there is no robust evidence that Proposal 3 (Option E) reflects community views or addresses concerns raised in the earlier survey, such as fears about being overlooked, equitable service access, or the need for transparency and accountability.

Proposal 3 (Option E) also creates a very small council that the proposal itself admits may struggle with capacity, resilience and sustainability, raising concerns about its ability to maintain strong local engagement functions, deliver community-level services, or support neighbourhood empowerment in practice.

While the proposal claims that maintaining district boundaries will help local identity, it simultaneously concedes that the smallest councils may have limited ability to carry out meaningful engagement and localised decision-making due to their constrained scale and resources.