



3 June 2025

LOCAL GOVERNMENT REORGANISATION

INTERIM PLAN FEEDBACK: OXFORDSHIRE

To the Chief Executives of:

Cherwell District Council
Oxford City Council
Oxfordshire County Council
South Oxfordshire District Council
Vale of White Horse District Council
West Oxfordshire District Council

Overview

Thank you for submitting your interim plans. The amount of work from all councils is clear to see across the range of options. For the final proposal(s), each council can submit a single proposal for which there must be a clear single option and geography and as set out in the guidance we expect this to be for the area as a whole, that is, the whole of the area to which the 5 February invitation was issued, not partial coverage.

Our aim for the feedback on interim plans is to support areas to develop final proposal(s). This stage is not a decision-making point, and our feedback does not seek to approve or reject any option being considered.

The feedback provided relates to the following:

- The interim plan submitted on behalf of all Oxfordshire Councils
- A new 'Ridgeway Council' for West Berkshire, South Oxfordshire and the Vale of White Horse: Interim proposal for a new unitary council

We have provided feedback on behalf of central government. It takes the form of:

1. A summary of the main feedback points,
2. Our response to the specific barriers and challenges raised in your plans,
3. An annex with more detailed feedback against each of the interim plan asks.

We reference the guidance criteria included in the invitation letter throughout, a copy can be found at [Letter: Oxfordshire – GOV.UK](#). Our central message is to build on

your initial work and ensure that your final proposal(s) address the criteria and are supported by data and evidence. We recommend that your final proposal(s) should use the same assumptions and data sets or be clear where and why there is a difference.

We welcome the work that has been undertaken across proposals to develop local government reorganisation plans for Oxfordshire. This feedback does not seek to approve or discount any option or proposal, but provide feedback designed to assist in the development of final proposals. We will assess your final proposal(s) against the guidance criteria provided in the invitation letter and have tailored this feedback to identify where additional information may be helpful in enabling that assessment. Please note that this feedback is not exhaustive and should not preclude the inclusion of additional materials or evidence in the final proposals. In addition, your named area lead in MHCLG, Jesse Garrick, will be able to provide support and help address any further questions or queries.

We are providing written feedback to invitation areas individually, but we will be led by you on how verbal feedback is best delivered and who is most appropriate to attend a feedback meeting, given that some of your proposals include an existing unitary council outside the invitation area.

Summary of Feedback:

We have summarised the key elements of the feedback below, with further detail provided in the Annex.

1. We note that options under consideration include West Berkshire Council. As noted in the invitation, it is open to you to explore options with neighbouring councils in addition to those included in the invitation. Only those councils named on the invitation can submit a proposal, but affected neighbouring councils can jointly submit with a named council. **If your final proposal(s) include a neighbouring council(s) from outside the invitation area you should clearly outline the implications of the proposal for that neighbouring council(s) and its wider area. As above, any proposal, regardless of whether a neighbouring council(s) is included, should set out a single, clear option and geography that covers the whole of the area to which the 5 February invitation was issued, not partial coverage.**
2. We note that some of your proposals may lead to boundary changes. As the invitation sets out, boundary changes are possible, but “existing district areas should be considered the building blocks for proposals, but where there is a strong justification more complex boundary changes will be considered.”
The final proposal(s) must specify the area for any new unitary council(s). If a boundary change is part of your final proposal, then you should be clear on the boundary proposed, which could be identified by a parish or ward boundary, or if creating new boundaries by attaching a map.

Proposals should be developed having regard to the statutory guidance which sets out the criteria against which proposals will be assessed (including that listed above).

If a decision is taken to implement a proposal, boundary change can be achieved alongside structural change. Alternatively, you could make a proposal for unitary local government using existing district building blocks and consider requesting a Principal Area Boundary Review (PABR) later. Such reviews have been used for minor amendments to a boundary where both councils have requested a review – such as the recent Sheffield/Barnsley boundary adjustment for a new housing estate. PABRs are the responsibility of the Local Government Boundary Commission for England who will consider such requests case-by-case.

3. In some of the options you are considering populations that would be above or below 500,000. As set out in the Statutory Invitation guidance and in the English Devolution White Paper, we outlined a population size of 500,000 or more. This is a guiding principle, not a hard target – we understand that there should be flexibility, especially given our ambition to build out devolution and take account of housing growth, alongside local government reorganisation. **All proposals, whether they are at the guided level, above it, or below it, should set out the rationale for the proposed approach clearly.**
4. The criteria ask that consideration should be given to the impacts for crucial services such as social care, children's services, SEND and homelessness, and for wider public services including for public safety (see criterion 3). **For any options where there is disaggregation, further detail will be helpful on how the different options might impact on these services and how risks can be mitigated.**
5. We welcome the steps Oxfordshire councils have taken to come together to prepare proposals (as per criterion 4):
 - a. **Effective collaboration between all councils will be crucial; we would encourage you to continue to build strong relationships and agree ways of working, including around effective data sharing. This will support the development of a robust shared evidence base to underpin final proposal(s).**
 - b. **It would be helpful if your final proposal(s) use the same assumptions and data sets or be clear where and why there is a difference.**
 - c. **It would be helpful if your final proposal(s) set out how the data and evidence supports all the outcomes you have included, and how well they meet the assessment criteria in the invitation letter.**
 - d. **You may wish to consider an options appraisal that will help demonstrate why your proposed approach in the round best meets the assessment**

criteria in the invitation letter compared to any alternatives.

6. We welcome the steps taken to engage neighbouring areas in a discussion about future devolution. Across all local government reorganisation proposal(s), looking towards a future Strategic Authority, **it would be helpful to outline how each option would interact with a Strategic Authority and best benefit the local community, including meeting the criteria for sensible geography in the White Paper and devolution statutory tests.**

Response to specific barriers and challenges raised

Please see below our response to the specific barriers and challenges that were raised in your interim plans.

1. Deadline for submission

Within your single unitary option, you have indicated a desire to submit your proposal(s) before the November deadline to allow you to progress your devolution and economic plans to a faster timetable. Councils can submit their proposals when they are ready, but we will not be able to consider them before the respective deadlines.

2. Interim proposal feedback

You have asked whether Government will indicate which proposal(s) they are not minded to approve following a review of the interim plans. Interim plans are not a decision-making point and decisions will be made on the basis of full proposals. As stated above this feedback does not seek to approve or discount any option or proposal, but provide some feedback designed to assist in the development of final proposals.

3. Final proposal assessment

You have asked how Government will assess final proposals, particularly if there is more than one potential option which meets the criteria for local government reorganisation within an area.

The criteria are not weighted. Our aim for this feedback is to support areas to develop final proposals that address the criteria and are supported by data and evidence. Decisions on the most appropriate option for each area will be judgements in the round, having regard to the guidance and the available evidence.

4. National funding reforms

You have asked for clarity about reforms to local government funding. Government recently consulted on funding reforms and confirmed that some transitional protections will be in place to support areas to their new allocations. Further details on funding reform proposals and transition measures will be consulted on after the Spending Review in June. We will not be able to provide further clarification on future allocations

in the meantime, but are open to discussing assumptions further if we can assist in financial planning.

5. Legislation for extending public contracts

In order to ensure the maximum benefits can be achieved through local government reorganisation, you have asked the government to consider legislating at the earliest opportunity to enable the extension of existing contracts and avoid the unnecessary duplication of contracts, and commitment of public funds, noting the powers of the Secretary of State under section 24 of the Local Government and Public Involvement in Health Act 2007 (the 2007 Act). We can discuss the making of such directions for areas going through reorganisation under the current programme at the appropriate time – such directions cannot be made until legislation is made to establish new authorities.

In the meantime, the invitation was clear that interim plans should set out any voluntary arrangements that have been agreed to keep all councils involved in discussions as this work moves forward and to help balance the decisions needed now to maintain service delivery and ensure value for money for council taxpayers, with those key decisions that will affect the future success of any new councils in the area.

In the meantime, we expect Councils to be pragmatic and take account of the LGR landscape when taking decisions on contractual arrangements. This is important to demonstrating the value for money of contractual arrangements moving forwards.

6. National SEND system reforms

We note your financial concerns about Special Educational Needs and Disabilities (SEND) services and request for more information about national reforms to SEND provision.

The government has provided a £1 billion increase to SEND and Alternative Provision funding in 2025-26. This is an important step in realising the Government's vision to reform England's SEND provision to improve outcomes and return the system to financial sustainability. The Government will work closely with parents, teachers and local authorities to take forward this work.

We recognise the impact that the Dedicated Schools Grant (DSG) deficits are having on councils' finances and will work with the sector on a way forward.

The Government intends to set out plans for reforming the SEND system in further detail this year. This will include details of how the Government will support local authorities to deal with their historic and accruing deficits and any transition period from the current SEND system to the reformed system. This will inform any decision to remove the DSG Statutory Override.

Your delivery lead, Jesse Garrick, will be able to support engagement with the Department for Education over the coming months to discuss the impact of any national reforms.

ANNEX: Detailed feedback on criteria for interim plan

Ask – Interim Plan Criteria	Feedback
<p>Identify the likely options for the size and boundaries of new councils that will offer the best structures for delivery of high-quality and sustainable public services across the area, along with indicative efficiency saving opportunities.</p> <p>Relevant criteria:</p> <p>1c) Proposals should be supported by robust evidence and analysis and include an explanation of the outcomes it is expected to achieve, including evidence of estimated costs/benefits and local engagement.</p> <p>2a-f) Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks.</p> <p>3a-c) Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens.</p>	<p>We welcome the initial thinking on the options for local government reorganisation in Oxfordshire and recognise that this is subject to further work.</p> <p>We note the local context and challenges outlined in the proposals and the potential benefits that have been identified for the options put forward. Your plans set out your intention to undertake further analysis, and this further detail and evidence on the outcomes that are expected to be achieved of any preferred model would be welcomed.</p> <p>In your final proposal(s) you may wish to consider an options appraisal against the criteria set out in the letter to provide a rationale for the preferred model against alternatives.</p> <p>For your final proposal(s), each council can submit a single proposal for which there must be a clear single option and geography and as set out in the guidance we expect this to be for the area as a whole; that is, the whole of the area to which the 5 February invitation was issued, not partial coverage.</p> <p>Where there are proposed boundary changes, your proposal(s) will need to provide strong public services and financial sustainability related justification for the change.</p> <p>Proposals should be for a sensible geography which will help to increase housing supply and meet local needs, including future housing growth plans. All proposals should set out the rationale for the proposed approach.</p> <p>It would be helpful to understand how efficiency savings have been considered alongside a sense of place and local identity.</p> <p>In final proposal(s) it would be helpful to include a high-level financial assessment which covers transition costs and overall forecast operating costs of the new unitary councils.</p>

	<p>We will assess final proposal(s) against the criteria in the invitation letter. Referencing criteria 1 and 2, you may wish to consider the following bullets:</p> <ul style="list-style-type: none"> • high level breakdowns for where any efficiency savings will be made, with clarity of assumptions on how estimates have been reached and the data sources used, including differences in assumptions between proposals • information on the counterfactual against which efficiency savings are estimated, with values provided for current levels of spending • a clear statement of what assumptions have been made if the impacts of inflation are taken into account • a summary covering sources of uncertainty or risks, with modelling, as well as predicted magnitude and impact of any unquantifiable costs or benefits • where possible, quantified impacts on service provision as well as wider impacts <p>We recognise that the financial assessments are subject to further work. The bullets below indicate where further information would be helpful across all options. As per criteria 1 and 2 it would be helpful to see:</p> <ul style="list-style-type: none"> • data and evidence to set out how your final proposal(s) would enable financially viable councils across the whole area, including identifying which option best delivers value for money for council taxpayers • further detail on potential finances of new unitaries, for example, funding, operational budgets, potential budget surpluses/shortfalls, total borrowing (General Fund), and debt servicing costs (interest and MRP); and what options may be available for rationalisation of potentially surplus operational assets • clarity on the underlying assumptions underpinning any modelling e.g. assumptions of future funding, demographic growth and pressures, interest costs, Council Tax, savings earmarked in existing councils' MTFS • financial sustainability both through the period to the creation of new unitary councils as well as afterwards • as per criterion 2f proposal(s) should reflect the extent to which debt can be managed locally,
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	<p>including as part of efficiencies possible through reorganisation</p> <p>For proposals that would involve disaggregation of services, we would welcome further details on how services can be maintained where there is fragmentation, such as social care, children's services, SEND, homelessness, and for wider public services including public safety. With reference to criterion 3c you may wish to consider:</p> <ul style="list-style-type: none"> • how each option would deliver high-quality and sustainable public services or efficiency saving opportunities • what would the different options mean for local services provision, for example: <ul style="list-style-type: none"> ○ do different options have a different impact on SEND services and distribution of funding and sufficiency planning to ensure children can access appropriate support, and how will services be maintained? ○ what is the impact on adult and children's care services? Is there a differential impact on the number of care users and infrastructure to support them from the different options? ○ what partnership options have you considered for joint working across the new unitaries for the delivery of social care services? ○ do different options have variable impacts as you transition to the new unitaries, and how will risks to safeguarding be managed? ○ do different options have variable impacts on schools, support and funding allocation, and sufficiency of places, and how will impacts on schools be managed? ○ what impact will there be on highway services across the area under the different approaches suggested? ○ what are the implications for public health, including consideration of socio-demographic challenges and health inequalities within any new boundaries and their implications for current and future health service needs? What are the implications for how residents access services and service delivery for populations most at risk? <p>We welcome the desire to maximise the opportunity for public service reform, and it would be helpful for you to provide more details on your plans so we can explore how best to support your efforts.</p>
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<p>Include indicative costs and arrangements in relation to any options including planning for future service transformation opportunities.</p> <p>Relevant criterion:</p> <p>2d) Proposals should set out how an area will seek to manage transition costs, including planning for future service transformation opportunities from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects.</p>	<p>In the final proposal, we would welcome further clarity on the assumptions and data used to calculate the transition costs and efficiencies for each (see criterion 2d).</p> <p>As per criterion 2, the final proposal(s) should set out how an area will seek to manage transition costs, including planning for future service transformation opportunities from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects.</p> <ul style="list-style-type: none"> • within this it would be helpful to provide detailed analysis on expected transition and/or disaggregation costs and potential efficiencies of proposals. This could include clarity on methodology, assumptions, data used, what year these may apply and why these are appropriate • detail on the potential service transformation opportunities and invest-to-save projects from unitarisation across a range of services - e.g. consolidation of waste collection and disposal services, and whether different options provide different opportunities for back-office efficiency savings? • where it has not been possible to monetise or quantify impacts, you may wish to provide an estimated magnitude and likelihood of impact • summarise any sources of risks, uncertainty and key dependencies related to the modelling and analysis • detail on the estimated financial sustainability of proposed reorganisation and how debt could be managed locally <p>We welcome the joint work you have done to date and recommend that all options and proposals should use the same assumptions and data sets or be clear where and why there is a difference (linked to criterion 1c).</p>
<p>Include early views as to the councillor numbers that will ensure both effective democratic representation for all parts of the area, and also effective governance and decision-making arrangements which will balance the unique needs</p>	<p>We welcome the early views you have provided for councillor numbers, which we will be sharing with the Local Government Boundary Commission for England (LGBCE). There are no set limits on the number of councillors although the LGBCE guidance indicates that a compelling case would be needed for a council size of more than 100 members.</p> <p>New unitary structures should enable stronger community engagement and deliver genuine</p>

<p>of your cities, towns, rural and coastal areas, in line with the Local Government Boundary Commission for England guidance.</p> <p>Relevant criterion:</p> <p>6) New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.</p>	<p>opportunity for neighbourhood empowerment.</p> <p>Additional details on how the community will be engaged, specifically how the governance, participation and local voice will be addressed to strengthen local engagement, and democratic decision-making would be helpful.</p> <p>In your final proposal(s) we would welcome detail on your plans for neighbourhood-based governance, the impact on parish councils, and the role of formal neighbourhood partnerships and area committees.</p>
<p>Include early views on how new structures will support devolution ambitions.</p> <p>Relevant criteria:</p> <p>5) - New unitary structures must support devolution arrangements.</p> <p>5a) Proposals will need to consider and set out for areas where there is already a Combined Authority (CA) or a Combined County Authority (CCA) established or a decision has been taken by Government to work with the area to establish one, how that institution and its governance arrangements will need to change to continue to function effectively; and set out clearly (where applicable) whether this proposal is supported by the CA/CCA /Mayor.</p>	<p>We welcome the area's commitment to devolution, and the adoption of the principle that governance arrangements in a future Strategic Authority should continue to equally represent all areas following local government reorganisation.</p> <p>Across all local government reorganisation proposal(s), looking towards a future Strategic Authority, it would be helpful to outline how each option would interact with a Strategic Authority and best benefit the local community, including meeting the criteria for sensible geography in the White Paper and devolution statutory tests.</p> <p>We cannot pre-judge the result or timelines of any future devolution discussions, but we will work with you to progress your ambitions where possible in due course.</p>
<p>Include a summary of local engagement that has been undertaken and any views expressed, along with your further plans for wide local</p>	<p>We welcome your interim update against criterion 6, and the engagement undertaken so far and your plans for the future.</p>

<p>engagement to help shape your developing proposals.</p> <p>Relevant criteria:</p> <p>6a-b) New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.</p>	<p>It is for you to decide how best to engage locally in a meaningful and constructive way with residents, voluntary sector, local community groups, parish councils, public sector providers, such as health, police and fire, and local businesses to inform your proposals.</p> <p>For proposals that involve disaggregation of services, you may wish to engage in particular with those residents who may be affected. It would be helpful to see detail that demonstrates how local ideas and views have been incorporated into the final proposal(s).</p> <p>It would be helpful to see further detail of your engagement plans and to provide detail that demonstrates how local ideas and views have been incorporated into your final proposal(s), including those relating to neighbouring authorities where relevant.</p>
<p>Set out indicative costs of preparing proposals and standing up an implementation team as well as any arrangements proposed to coordinate potential capacity funding across the area.</p> <p>Relevant criterion:</p> <p>2d) Proposals should set out how an area will seek to manage transition costs, including planning for future service transformation opportunities from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects.</p>	<p>We would welcome further detail in your final proposal(s) over the level of cost and the extent to which the costs are for delivery of the unitary structures or for transformation activity that delivers benefits (see criterion 2d).</p> <p>£7.6 million will be made available in the form of local government reorganisation proposal development contributions, to be split across the 21 areas. Further information will be provided on this funding shortly.</p>
<p>Set out any voluntary arrangements that have been agreed to keep all councils involved in</p>	<p>We welcome the ways of working together you have outlined in the interim plans (see criterion 4).</p>

<p>discussions as this work moves forward and to help balance the decisions needed now to maintain service delivery and ensure value for money for council taxpayers, with those key decisions that will affect the future success of any new councils in the area.</p> <p>Relevant criteria:</p> <p>4a-c) Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views.</p>	<p>Effective collaboration between all councils will be crucial; areas will need to build strong relationships and agree ways of working, including around effective data sharing. This will enable you to develop a robust shared evidence base to underpin your final proposal(s) (see criterion 1c).</p> <p>We note that two of the options under consideration include the geography of West Berkshire Council, which sits outside of the invitation area. If your final proposal(s) include a neighbouring council(s) from outside of the invitation area, then significant engagement between council(s) in the invitation area with any council(s) outside the invitation area that are directly impacted would be helpful during the development of that joint proposal, including through effective data-sharing.</p> <p>We recommend that your final proposal(s) should use the same assumptions and data sets or be clear where and why there is a difference.</p>
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