2 Unitary Authority- Consultation Response DRAFT

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

Strongly disagree.

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

Strongly disagree.

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

Strongly disagree.

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

Strongly disagree.

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

Strongly disagree.

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

Disagree.

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

Strongly Disagree.

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

Strongly Disagree.

9. If you would like to, please use the free text box to explain the answers you have provided to questions 1-8 referring to the question numbers as part of your answer. You may also use the box to provide any other comments you have on this proposal.

Q1. Sensible geographies and economic areas

The establishment of two unitary councils, splitting Oxfordshire, would fragment an established and highly integrated economic and social geography. The Ridgeway and Oxford and Shires proposals do not present a clear place narrative that residents or business identify with. Ridgeway lacks a focal economic or cultural focus. Oxford and Shires would be dominated by Oxford, particularly, as set out in the services section, for serving high needs in Oxford. The most likely outcome being that services have to concentrate on the city, to the disadvantage of those living in rural areas and significant inequalities like Banbury.

Evidence from Metro Dynamics shows that Oxfordshire's fastest growing sectors are distributed across the county rather than concentrated in one place. This evidence recognises the benefits of industries clustering around the city, while also highlighting the strong links between business ecosystems across the whole county. Travel to work, education, healthcare and leisure patterns are overwhelmingly countywide, particularly along key corridors linking Oxford, Bicester, Didcot, the Science Vale of Culham, Milton Park and Harwell. Splitting the county would sever the Knowledge Spine and fragment economic strategy, weakening leverage with government and investors. Oxfordshire also operates within wider economic geographies, including the Thames Valley and the Oxford Cambridge Growth Corridor. These opportunities depend on strategic scale and coherence, which would be undermined by two competing councils.

Two unitaries would fragment partnerships, duplicate effort and complicate strategic planning, infrastructure delivery, inward investment and skills planning. Critically the 2UA model would put an arbitrary upper-tier authority boundary right though the edge of the city leaving highly connected areas like Botley, Wheatley and Kennington in a neighbouring council. In contrast, One Oxfordshire would enable a single, coherent growth strategy aligned to the county's real economic geography.

The proposed Oxford & Shires and Ridgeway councils are not based on sensible geographies. Disaggregating services currently delivered on a county footprint—particularly transport, social care, SEND and public health—would create significant cost, risk and disruption for residents without any guarantees that outcomes would be improved.

The inclusion of West Berkshire lacks a clear economic rationale as evidenced in the travel to work area of Oxfordshire which clearly shows an absence of significant movements between Oxfordshire and West Berkshire for work purposes. Furthermore, the council was not part of the statutory invitation.

Many economic development functions are most effective at county scale, including inward investment, skills planning, business support and infrastructure delivery. Attracting inward investment requires presenting Oxfordshire at countywide or pan-regional scale, with a coherent portfolio of opportunities across knowledge-intensive sectors. A strong proposition depends on combining strategic scale with locally defined sites and projects. Over the past five years, Enterprise Oxfordshire's inward investment team has supported 184 inward investment

projects, securing c.£3.6bn of investment and supporting 6,500 jobs across Oxfordshire. Undertaking this work on a smaller geography could risk fragmentation and unnecessary competition between areas. The significant amount of housing development required to unlock economic growth requires an integrated approach to planning and delivery, this would be best met through a single unitary council as key supporting services such as strategic infrastructure, water and digitial systems serve multiple labour markets and sites, making a countywide approach to planning and prioritisation of sites essential.

Q2. Ability to deliver outcomes

The 2UA proposal significantly underestimates the complexity and risk of reorganisation. It assumes strong collaboration between the two new councils without setting out clear governance, dispute resolution or accountability arrangements.

The proposal provides limited detail on how staff with different organisational histories would be integrated, or how disruption to essential partnerships—such as safeguarding, joint commissioning and highways—would be avoided.

The Oxfordshire 2050 Plan – Joint Statutory Spatial Plan failed to be delivered because the five planning authorities could not reach an agreement on how to plan for future housing and growth allocations across the county. This demonstrates that multiple planning authorities cannot be relied upon to reach an agreement to deliver housing and growth ambitions. Only creating a single unitary authority for Oxfordshire can truly ensure housing and growth potential for the county is fully realised.

By splitting responsibility for housing and employment across two authorities, the model risks fragmentation that would act as a barrier to delivery. The proposals are unclear on how long-standing issues of co-operation across areas would be addressed. There is a risk that this will result in getting the balance wrong between job growth and housing delivery across the geography, exacerbating the twin challenges of housing affordability and pressure on transport infrastructure. If projected growth and savings are not realised, the financial consequences could be significant and difficult to manage for small unitary authorities.

Disaggregation of services, particularly public health, adult social care and children's services, would be materially costly, complex and risky. Smaller budgets would reduce commissioning power and resilience, and shared service arrangements lack clear governance. The proposal recognises workforce risks but provides little detail on how these would be managed. £15.9m transformation savings arising from redesigning social care services are estimated to be delivered from year 5 onwards; the proposal says that this total includes cost avoidance measures which CIPFA LGR guidance advises should not be included so the saving is overstated. It is also unclear what costs would be required to deliver the savings or for social care systems and whether these adequately reflect the cost of disaggregating these services.

There are extensive shared service arrangements between existing Berkshire and surrounding councils. West Berkshire itself is either a partner or lead for over 30 shared service arrangements, removal from these shared service contracts would be felt by all Berkshire and surrounding councils at a critical and fragile time and may serve to undermine the operational stability of their neighbouring authorities. There is also an added complexity of needing to manage two Local Government Pension Scheme funds from Oxfordshire and Berkshire, with no clear method of managing this.

The proposal also fails to adequately address the challenge of asset disaggregation. Services such as social care, waste and transport rely on assets unevenly distributed across the county. Splitting these would leave both councils dependent on complex joint arrangements, undermining the case for separation.

The Peopletoo report, which underpins the 2UA proposal, uses flawed assumptions, particularly around social care costs. Independent analysis by the County Councils Network (CCN) and Newton shows that deprivation and income—not council size— are the primary drivers of care costs, and that larger authorities tend to pay less per unit when these factors are also considered. This significantly weakens the proposal's financial and service delivery claims.

Q3. Size, efficiency and financial resilience

Both proposed councils would fall below the government's recommended population threshold of 500,000, reducing efficiency, resilience and strategic capacity. Disaggregation would increase costs and risk service disruption, particularly given that the county council currently delivers the majority of local government services by expenditure.

Ridgeway Council's resilience would be further undermined by the inclusion of West Berkshire who have in principle approval from MHCLG for exceptional financial support of £30m in 2026/27 in addition to £20m in 2025/26 (increased from £3.0m) and £13m in 2024/25. This has the potential to significantly impact on the stability of the council from the outset importing financial risk, weaker reserves and ongoing additional transformation pressures from day one.

Q4. Financial sustainability

The financial case relies heavily on ambitious transformation savings that would save £59.8m per year in the best-case scenario. Financial modelling is based on an assumption of a percentage saving based on the budget at vesting day. Given the additional financial challenges facing West Berkshire Council, it may not be realistic to assume that the projected level of savings can be achieved in an existing unitary area, especially given that the council area is already in receipt of exceptional financial support.

The proposal acknowledges the impact of the Fair Funding Review but does not reflect this uncertainty in its modelling. There is also no clear roadmap for IT and

digital rationalisation—an area that has driven cost overruns in previous local government reorganisation processes.

Disaggregation costs are understated, while aggregation benefits are overstated. For example, highways are treated as an aggregation opportunity despite requiring significant disaggregation in practice. By contrast, One Oxfordshire avoids disaggregation costs and offers a more robust and sustainable financial footing.

Furthermore, the inclusion of West Berkshire Council who have in principle approval from MHCLG for exceptional financial support of £30m in 2026/27 in addition to £20m in 2025/26 (increased from £3.0m) and £13m in 2024/25 has the potential to significantly impact on the stability of Ridgeway council from the outset.

A single unitary offers higher savings, lower transition costs, faster payback and significantly lower delivery risk. It would also maintain established policing, fire and rescue, NHS and voluntary sector geographies.

Q5. Quality and sustainability of public services

Adults & Childrens Social Care

Disaggregating adult social care would break up a high performing, CQC 'Good' rated service and introduce significant operational, financial and safeguarding risk. The proposal underestimates the complexity of meeting Care Act duties from vesting day.

The proposal is silent on the future of the Safeguarding Adults Board and Safeguarding Children's Partnership. Under the Care Act 2014, each authority must establish these, requiring either two new boards or a legally complex joint arrangement — neither of which is addressed or costed. West Berkshire is currently part of an integrated partnership that includes Reading and Wokingham councils so this would involve needing to disaggregate an existing partnership as well as setting up new arrangements to cover the new authorities covering the existing Oxfordshire geography.

Smaller authorities risk fragmented provider markets, weaker bargaining power, workforce pressures and greater exposure to uneven demand. Evidence from CCN and Newton shows that larger authorities deliver better rated services and greater financial stability.

Similar risks apply to Children's Services, including SEND. Demand is unevenly distributed across the county, with higher pressures in Oxford City and Cherwell. Splitting services would reduce flexibility, disrupt partnerships with schools and the NHS, and risk poorer outcomes for children.

Fire and Rescue

An independent analysis of the likely cost of a freestanding Oxfordshire Fire and Rescue Authority shows that this could be between £34m and £50m at the maximum. Compared to other freestanding fire authorities, an Oxfordshire

Combined Fire and Rescue Authority would be relatively small – even at the higher end of that range - so on-going financial sustainability would likely be an issue unless the service merged with another neighbouring fire authority adding further complexity to the implementation of the proposal. A merger would most likely be with Royal Berkshire Fire and Rescue Service unless legislative changes permit a Foundation Strategic Authority to take on this responsibility.

The ability to fund capital works and any increases in costs for new vehicles above the existing planned level, would also be challenging as this would be reliant on capital receipts from the existing Oxfordshire Fire and Rescue Service property estate, revenue contributions, or borrowing which would impact on on-going revenue costs.

There would be diseconomies arising from the requirement for additional governance and activity such as the need to develop and agree a budget and produce a separate statement of accounts. Ongoing commissioning of effective value for money support services including those critical for delivery of an emergency service would be challenging for a service of this scale.

The level of reserves and balances that would be disaggregated would be relatively small. A smaller organisation, especially with lower levels of financial reserves, would be less financially resilient to sudden events. For example, the annual impact of pay inflation – estimated at around £0.8m for an uplift of around 3% would need to be met within the funding for the authority rather than being supported by the flexibility of the wider council budget. It would also be less able to cope with the costs of major incidents or accidents. Ultimately, we believe that making a blue light service potentially financially unsound through disaggregation creates an unacceptable level of risk that can only be mitigated by creating a countywide unitary through One Oxfordshire.

Other services

Other upper tier services, including highways, public health, minerals and waste planning, are also underdeveloped in the proposal and would be more difficult and costly to manage at smaller scale.

Q6. Local views and equality

Although engagement was broad, there is limited evidence that it was representative or that concerns raised by residents and stakeholders were meaningfully addressed. A significant proportion of respondents felt their views would have little impact on decisions.

The 2UA proposal is not accompanied by an Equality Impact Assessment. While not legally required, this is best practice and essential for demonstrating compliance with the Public Sector Equality Duty.

Q7. Devolution

Smaller is not better when it comes to devolution. A single council is easier for government and regional partners to work with, providing a single point of contact,

avoiding duplication and an inconsistent approach to regional priorities. Smaller unitaries would lack the financial resilience and strategic capacity needed to deliver on devolved powers.

Two unitaries would dilute Oxfordshire's voice and complicate collaboration at a strategic authority level, be it foundational or mayoral. Treating Oxford & Shires and Ridgeway as separate economies breaks up the Knowledge Spine and weakens Oxfordshire's role as a strategic growth engine. Government guidance favours larger, strategic partners for devolution which can best be found in the One Oxfordshire proposal with a single, unified, voice for the county. A single county authority provides a stronger, clearer partner for devolution.

Q8. Community engagement and neighbourhood empowerment

The proposal does not safeguard Oxford's city status or provide clear mechanisms for city level empowerment. Its approach to locality working risks oversimplifying Oxford's diverse needs. There is a relative overrepresentation of councillors for West Berkshire than from South Oxfordshire and Vale of White Horse in the proposed Ridgeway Council, leading to the latter areas having a democratic deficit in comparison.

There is limited clarity on the role and support of town and parish councils, despite acknowledged anxiety about increased responsibilities. The 2UA proposal lacks information surrounding the support that will be put in place for town and parish councils under the two proposed unitaries, especially regarding support on offer if town and parish councils take on enhanced responsibilities.

One Oxfordshire provides a clearer, more consistent framework for neighbourhood governance and support. One Oxfordshire builds on the successful Town and Parish Council Charter as a basis for positive engagement with towns and parishes and empowering parishes to take on additional responsibilities where there is a clear desire to do this.

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

    Strongly disagree.

11. **If you would like to, please use this free text box to explain your answer to question 10.**

    - **The inclusion of West Berkshire would pose a financial threat to the success of Local Government Reorganisation in Oxfordshire, and arguments for its inclusion are unconvincing.**
        - West Berkshire Council is in receipt of exceptional financial support (EFS) from the government and has received in principle approval for a further £30m EFS in 2026/27 in addition to £20m for 2025/25 (revised

up from £3.0m) and £13m for 2024/25. The government expect local authorities seeking additional support to have robust plans to deliver the improvements and service transformation required to help them to return to financial stability over the multi-year settlement. The on-going, and escalating, requirement for EFS means that including West Berkshire Council would import significant and unnecessary financial risk into Ridgeway Council from day one. It would also add further complexity and risk to transformation costs and savings.

- West Berkshire Council is already a unitary council and has not been invited to submit plans for reorganisation, and it is hard to argue that the inclusion of West Berkshire would benefit the residents of Oxfordshire given the financial risk it would add to local government in the county.

- The financial case for including West Berkshire is weak, as it argues that West Berkshire is too small to survive alone and that the two unitary model represents the greater good. Oxfordshire residents and businesses would effectively be subsidising West Berkshire while taking on additional risk. This is not in the best interests of our county.

- There are extensive shared service arrangements between existing Berkshire and surrounding councils. West Berkshire itself is either a partner or lead for over 30 shared service arrangements, removal from these shared service contracts would be felt by all Berkshire and surrounding councils at a critical and fragile time and may serve to undermine the stability of their neighbouring authorities.

- **While the 2UA proposal justifies West Berkshire's inclusion on the grounds of traditional boundaries, these do not align with the realities of the area's current relationship with neighbouring authorities.**
  - There is minimal economic activity or travel to work pattern between West Berkshire and Oxfordshire.
  - West Berkshire has a closer functional relationship with Reading, and creating a firmer boundary between the two authorities could create unnecessary friction. For example, most of West Berkshire's growth effectively forms suburban Reading, as 74% of West Berkshire is protected within the North Wessex Downs National Landscape. Reinforcing this boundary could store up housing conflict and duty to cooperate issues for the future.
  - It would create unnecessary and costly disruption of Oxfordshire Fire and Rescue Service, the coroners service and the boundaries of the Lieutenancy, which all operate on an Oxfordshire footprint, in addition to the disruption expected through the disaggregation of services such as SEND, adult and children's social care and transport.
  - Furthermore, South Oxfordshire and Vale of White Horse are in a different Functional Economic Area to West Berkshire, which is not acknowledged within the proposal.