



Ministry of Housing,  
Communities &  
Local Government

3 June 2025

## **LOCAL GOVERNMENT REORGANISATION INTERIM PLAN FEEDBACK: WARWICKSHIRE**

To the Chief Executives of:  
North Warwickshire Borough Council  
Nuneaton and Bedworth Borough Council  
Rugby Borough Council  
Stratford-on-Avon District Council  
Warwick District Council  
Warwickshire County Council

### **Overview**

Thank you for submitting your interim plans. The amount of work from all councils is clear to see across the options being considered. 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 proposals. 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:

- Interim plan sent on behalf of the district and borough councils concluding that single and two unitary options can meet all the criteria for local government reorganisation; and
- Interim plan sent on behalf of Warwickshire County Council concluding that only a single unitary for the area can meet the criteria.

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: WARWICKSHIRE – GOV.UK](#). Our central message is to build on your initial work and ensure that the final proposal(s) address the criteria and

are supported by data and evidence. We recommend that 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 Warwickshire. This feedback does not seek to approve or discount any options or proposals, but provide some feedback designed to assist in the development of final proposal(s). We will assess 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 proposal(s). In addition, your named area lead, Jon Scanlan, will be able to provide support and help address any further questions or queries.

### **Summary of the Feedback:**

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

1. In your proposals, 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.**
2. 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.**
3. We welcome the steps taken to come together to prepare interim plans, 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 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.**
4. In final proposal(s) it would be helpful to outline how each option would interact with a Strategic Authority and best benefit the local community, including meeting 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. Devolution and Strategic Authority options**

One of the plans asks for clarity about what potential Strategic Authority options will be available for Warwickshire to assist your consideration of reorganisation options.

We welcome the acknowledgement in the interim plans that there is a significant opportunity for devolution beyond the current non-mayoral agreement and the options you have set out for potential devolution routes for Warwickshire. In the detailed feedback table below, we have asked for further detail on devolution, but in summary:

- a. **Existing devolved powers:** Proposals should consider the impact of each option for reorganisation on the exercise of the new housing, regeneration, and adult skills powers being conferred by upcoming legislation to Warwickshire County Council as part of the current agreement, and what the options may be for exercising devolved functions once new unitaries are formed under each option.
- b. **Future options for devolution:**  
We cannot pre-judge the result or timelines of any future devolution discussions, but we will work with you to progress any ambitions where possible in due course.

#### **2. Early written feedback on area proposal**

You asked for early written feedback from Government on the interim plans. This is our feedback to support you to develop your final proposal(s), we are open to providing ongoing support to your work to progress your final plan. Jon Scanlan is your MHCLG lead contact and is ready to engage with the whole area on issues you wish to discuss further.

**ANNEX: Detailed feedback on criteria for interim plan**

<b>Ask – Interim Plan Criteria</b>	<b>Feedback</b>
<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>and</p> <p>2a-f) Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks.</p> <p>and</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 Warwickshire and recognise that this is subject to further work. We note the local context and challenges outlined in the plans 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 for the whole area of any preferred model would be welcomed.</p> <p>Effective collaboration between all Warwickshire councils will be crucial to reaching final proposal(s). We would encourage you to continue to build strong relationships and agree ways of working, including around effective data sharing.</p> <p>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.</p> <p>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>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>We recognise that the options outlined in the interim plans are subject to further development. 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 your final proposal(s) against the criteria in the invitation letter. Referencing criterion 1 and 2, you may wish to consider the following bullets:</p> <ul style="list-style-type: none"> <li>• high level breakdowns for where any efficiency savings will be made, with clarity of assumptions on</li> </ul>

	<p>how estimates have been reached and the data sources used, including differences in assumptions between proposals</p> <ul style="list-style-type: none"> <li>• how efficiency savings have been considered alongside a sense of local place and identity</li> <li>• information on the counterfactual against which efficiency savings are estimated, with values provided for current levels of spending</li> <li>• a clear statement of what assumptions have been made and if the impacts of inflation are taken into account</li> <li>• a summary covering sources of uncertainty or risks, with modelling, as well as predicted magnitude and impact of any unquantifiable costs or benefits</li> <li>• where possible, quantified impacts on service provision, as well as wider impacts.</li> </ul> <p>We recognise that financial assessments are subject to further work. Referencing criteria 1 and 2, the bullets below indicate where further information would be helpful across all options:</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• 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</li> <li>• 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</li> <li>• financial sustainability both through the period to the creation of new unitary councils as well as afterwards.</li> </ul> <p>For proposals that would involve disaggregation of services, we would welcome further details on how services can be maintained, for example, for social care, children's services, SEND, homelessness, and for wider public services including public safety</p>
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	<p>Under criterion 3c you may wish to consider:</p> <ul style="list-style-type: none"> <li>• how each option would deliver high-quality and sustainable public services or efficiency saving opportunities</li> <li>• what are the potential impacts of disaggregating services?</li> <li>• what would the different options mean for local services provision, for example: <ul style="list-style-type: none"> <li>• 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?</li> <li>• 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?</li> <li>• what partnership options have you considered for joint working across the new unitaries for the delivery of social care services?</li> <li>• do different options have variable impacts as you transition to the new unitaries, and how will risks to safeguarding be managed?</li> <li>• do different options have variable impacts on schools, support and funding allocation, and sufficiency of places, and how will impacts on schools be managed?</li> <li>• what might be the impact on highway services across the area under the different approaches suggested?</li> <li>• 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?</li> </ul> </li> </ul> <p>We would encourage you to provide further details on how your proposals would maximise opportunities for public service reform, so that we can explore how best to support your efforts.</p>
Include indicative costs and arrangements in	As per criterion 2, the final proposal(s) should set out how an area will seek to manage transition costs,



<p>relation to any options including planning for future service transformation opportunities.</p> <p>Relevant criteria:</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>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"> <li>• within this it would be helpful to provide detailed analysis on expected transition and/or disaggregation costs and potential efficiencies of proposal(s). This could include clarity on methodology, assumptions, data used, what year these may apply and why these are appropriate</li> <li>• 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</li> <li>• where it has not been possible to monetise or quantify impacts, you may wish to provide an estimated magnitude and likelihood of impact</li> <li>• summarise any sources of risks, uncertainty and key dependencies related to the modelling and analysis</li> <li>• detail on the estimated financial sustainability of proposed reorganisation and how debt could be managed locally</li> </ul> <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 of your cities, towns, rural and coastal areas, in line with the Local Government Boundary Commission for England guidance.</p>	<p>We welcome the early views you have provided of 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 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</p>

<p>Relevant criteria:</p> <p>6) New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.</p> <p>6a) Proposals will need to explain plans to make sure that communities are engaged</p>	<p>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 neighbourhood Area Committees.</p>
<p>Include early views on how new structures will support devolution ambitions.</p> <p>Relevant criteria:</p> <p>5a-c) New unitary structures must support devolution arrangements.</p> <p>Specifically 5b) Where no CA or CCA is already established or agreed then the proposal should set out how it will help unlock devolution.</p>	<p>We note you are considering different devolution options and are discussing with wider stakeholders how to develop a clear roadmap for devolution for Warwickshire. MHCLG officials are working with you on these matters separately.</p> <p>Across all local government reorganisation proposal(s), looking towards a potential 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 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</p>	<p>We note your interim update against criterion 6 and recognise the limitations on local engagement it has been possible to undertake to date.</p> <p>It is for you to decide how best to engage locally in a meaningful and constructive way with residents, the voluntary sector, local community groups, neighbourhood boards, public sector providers such as health, police and fire, and local businesses to inform your final proposal(s).</p> <p>For the proposal that involves disaggregation of services, you may wish to engage in particular with those residents who could be affected</p>



neighbourhood empowerment.	It would be helpful to see detail that demonstrates how local ideas and views have been incorporated into your final proposal(s).
<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 criteria:</p> <p>Linked to 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 note the indicative costs included in the plans. We recognise these are early estimates and would welcome updated costs as the process goes forward, including those related to the costs of consultancy support.</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>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 additional benefits.</p>
<p>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.</p> <p>Relevant criteria:</p> <p>4 a-c) Proposals should show how councils in the area have sought to work</p>	<p>We welcome the ways of working together you have outlined in the interim plans (see criterion 4) and the commitment to the councils across Warwickshire to co-operate fully on local government reorganisation and share data/information etc.</p> <p>Continuing such collaborative working between all the councils of Warwickshire, including agreeing principles for working together, and sharing data, resources and expertise, will be crucial in developing robust final proposals.</p> <p>We recommend that final proposal(s) should use the same assumptions and data sets or be clear where and why there is a difference.</p>

together in coming to a view that meets local needs and is informed by local views.	
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