



Ministry of Housing,
Communities &
Local Government

3 June 2025

LOCAL GOVERNMENT REORGANISATION

INTERIM PLAN FEEDBACK: NOTTINGHAMSHIRE AND NOTTINGHAM

To the Chief Executives of:

Ashfield District Council

Bassetlaw District Council

Broxtowe Borough Council

Gedling Borough Council

Mansfield District Council

Newark and Sherwood District Council

Nottinghamshire County Council

Rushcliffe Borough Council

Nottingham City Council

Overview

Thank you for submitting your interim plan. The amount of work from all councils is clear to see across the range of options being considered. For the final proposals, 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 following:

- The Nottingham and Nottinghamshire Interim Plan for Local Government Reorganisation
- The letter submitted by Nottingham City Council and proposed option
- The Rushcliffe Borough Council letter and proposed options
- The letter submitted by Broxtowe Borough Council
- The letter submitted by Bassetlaw District Council, Gedling Borough Council and Mansfield District 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: NOTTINGHAMSHIRE AND NOTTINGHAM – 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 to develop local government reorganisation plans for Nottinghamshire and Nottingham. 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. We will assess final proposals 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 in MHCLG, Katrina Crookdake, 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 some of the options you are considering populations that would be below or above 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 public safety (see criterion 3). **For any options where you are considering 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 steps taken to come together to prepare proposals as per criterion 4:
 - a. **Effective collaboration between all councils across the invitation area 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 proposals.**
 - b. **It would be helpful if final proposal(s) use the same assumptions and data sets.**
 - c. **It would be helpful if 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 develop the options appraisal to help demonstrate why your proposed approach in the round best meets the assessment criteria in the invitation letter compared to any alternatives.**
4. We welcome the consideration of the implications and potential benefits of unitarisation for the East Midlands Combined County Authority (EMCCA). Further information would be helpful on the implications of the proposed local government reorganisation options for the governance arrangements in EMCCA. It would also be helpful to outline how each option would interact with EMCCA and best benefit the local community.

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. Public feedback and consultation requirements

You asked about the approach to consultation and the weighting given to public feedback in the assessment of the final proposal(s).

Once a proposal has been submitted it will be for the Government to decide on taking a proposal forward and to consult as required by statute. The Secretary of State may not implement a proposal unless she has consulted with other councils affected by it and any other appropriate person. We are happy to engage further on these consultation requirements and the likely process for areas undergoing reorganisation in due course.

Decisions on the most appropriate option for each area will be judgements in the round, having regard to the guidance and the available evidence. As set out in the answer to question three, the criteria are not weighted.

It is for you to decide how best to engage locally in a meaningful and constructive way with residents, voluntary sector, local community groups, Neighbourhood Boards, parish councils, public sector providers, such as health, police and fire, and local

businesses to inform your proposals. We note the interim plans helpfully set out a range of engagement with stakeholders.

2. Additional costs for developing proposals and capacity funding

You have requested confirmation on the capacity funding that will be provided from government to meet the costs of developing proposals.

£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.

3. Consideration of local criteria and clarity of feedback

You asked whether government will consider locally applied criteria or use a weighting for the criteria against which final proposals are assessed. 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.

You also noted the importance of timely feedback and decision making to support local government reorganisation work to move at pace. Katrina Crookdake has been appointed as your MHCLG point person and will be ready to engage with the whole area, to support this work to continue at pace.

4. Support for local partners to introduce new or alternative options

You note that your interim plan contains indicative proposals and that additional options may be put forward. For the November submission, each council can submit a single proposal for which there must be a clear single option and geography. These options are not limited to those you have outlined in your interim plan. We will not provide written feedback on additional options. As set out above, Katrina Crookdake, as your MHCLG point person, will be happy to support you as you work towards the submission of your final proposal(s).

5. Engagement with officials during proposal development

We note the request to have direct engagement and ongoing dialogue with officials to support the development of proposals. Government is committed to supporting all invited councils equally while they develop proposal(s). As set out above, Katrina Crookdake will be your named area lead and is ready to engage with the whole area on issues you wish to discuss further ahead of the deadline for final plans on 28 November 2025.

6. Boundary changes

You have requested information on the implications of a boundary review for reorganisation in Nottinghamshire and Nottingham. As the invitation letter 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 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.

7. Treatment of debt

We note your request for dialogue with Government with respect to the levels of indebtedness among councils and on the treatment of debt. We expect proposals to set out how they will meet criterion 2 under the statutory invitation, and, as per criterion 2f, proposal(s) should reflect the extent to which debt can be managed locally, including as part of efficiencies possible through reorganisation. We will consider the financial analysis and evidence provided in final proposals.

8. Impact of the Spending Review on proposals

You asked about the impact of the Spending Review on proposals for local government reorganisation.

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.

9. Implications for Charter Towns and impact on ceremonial roles

You asked about the implications for Charter Towns within the proposed new unitary arrangements and the impact on ceremonial roles. This is important to the Government, as we know it is to local communities.

Where local government re-organisation might affect ceremonial privileges, we will work with local leaders to ensure that areas retain their ceremonial rights and privileges.

There is no intention that the priorities set out in the English Devolution White Paper will impact on the ceremonial counties or the important roles that Lord Lieutenants and High Sheriffs play as the Monarch's representatives in those counties, and ceremonial counties will be retained. The Government recognises and values the work they do in relation to civic, business, social and community life in the ceremonial counties, and will ensure that the ceremonial rights and privileges of an area will be maintained after any reorganisation of local government.

10. Guidance on Town and Parish Councils

You asked whether further guidance could be issued on town and parish councils.

The English Devolution White Paper was clear that we know people value the role of governance at the community scale.

All levels of local government have a part to play in bringing improved structures to their area through reorganisation. We will therefore want to see stronger community arrangements when reorganisation happens in the way councils engage at a neighbourhood or area level.

We recognise the value that parish councils offer to their local communities and continue to support the work they do; but this is not a replacement for local authorities hardwiring local community engagement into their own structures, preferably through neighbourhood Area Committees. Parish councils are independent institutions and are not a substitute for meaningful community engagement and neighbourhood working by a local authority. Areas considering new parish councils should think carefully about the distinct role they will play and how they might be funded, to avoid putting further pressure on local authority finances and/or new burdens on the taxpayer.

In final proposal(s), we would welcome further information on neighbourhood-based governance, the impact on parish councils, and the role of neighbourhood Area Committees.

11. Engagement on wider policy reform

You noted the importance of joined up communication with other government departments as well as MHCLG in respect of wider policy reform. As set out above, Katrina Crookdake will be your point person in MHCLG and will be able to support your engagement with other government departments.

12. Risk assessment of local government reorganisation on sustainability of care services

You note that some of your services are on improvement journeys and ask what support will be available during the reorganisation process to support the resilience of these services. In the final proposal(s) we would welcome further detail on your

concerns, including details of the particular risks in these instances and potential mitigations you may consider to manage this issue. Particular consideration of these issues would be welcome where you are considering disaggregation and amalgamation of services which are on improvement journeys. As set out above, Katrina Crookdake, as your point person will be happy to further discuss any particular concerns and connect you where helpful with relevant sector support

13. Regulatory impact

You asked that any upcoming regulatory inspections take account of the local government reorganisation process.

We recognise the additional demands on councils during reorganisation. Inspectorates are independent of central government and set their own timelines and frameworks. Inspectorates and regulators (such as Ofsted and the CQC) are a vital part of accountability, and support improvement for the benefit of local people. However, we will seek to work with them to ensure that they are well-informed of local government reorganisation and devolution processes and they can, at their discretion, factor them into their independent plans, for example, by tailoring or scheduling inspections and assessments to support local government reorganisation

14. Public consultation or referendum on final proposals

We note the request in the letter from Rushcliffe Borough Council for a public consultation exercise or referendum on the final proposals. As stated above, it is for you to decide how best to engage locally in a meaningful and constructive way with stakeholders, including residents.

Once a proposal has been submitted it will be for the Government to decide on taking a proposal forward and to consult as required by statute. The Secretary of State may not implement a proposal unless she has consulted with other councils affected by it and any other appropriate person. We are happy to engage further on these consultation requirements and the likely process for areas undergoing reorganisation in due course.

15. Request to pause reorganisation process

We note the concerns outlined in the letter from Broxtowe Borough Council on any unitary authority that includes the areas of Broxtowe and Nottingham City. We also note your request to pause the reorganisation process in the invitation area until Nottingham City Council is financially stable. We welcome the positive progress that has been made in Nottingham City Council's improvement to date, as outlined in the Commissioners' second report published on 8 May. Ministers are clear that the full range of reforms at the Council must now be embedded, alongside working collaboratively to develop proposals for local government reorganisation.

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>1 c) 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>&</p> <p>2 a-f) - Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks</p> <p>&</p> <p>3 a-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 Nottinghamshire and Nottingham and the engagement that has been started with stakeholders. We note the local context and challenges outlined in the proposals and the potential benefits that have been identified for the options put forward.</p> <p>We also welcome the input that has been sought from Commissioners appointed to Nottingham City Council and would encourage you to continue to engage with them as proposals are developed further.</p> <p>We welcome the analysis that has been developed to date in the joint proposal. Your plans set out your intention to develop this further, and this additional detail and evidence, on the outcomes that are expected to be achieved of any preferred model would be welcomed.</p> <p>You may wish to consider developing the options appraisal against the criteria set out in the letter to provide a rationale for the preferred model against alternatives.</p> <p>Where there are proposed boundary changes, the proposal should 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>Given the financial pressures you identify it would be helpful to understand how efficiency savings have been considered alongside a sense of place and local identity.</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</p>

	<p>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 proposal(s) • 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 and 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 for the joint plan submitted, initial modelling, including financial modelling has been conducted and note the financial pressures outlined in the joint interim plan. The bullets below indicate where 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 operational⁴¹ 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
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	<ul style="list-style-type: none"> • financial sustainability both through the period to the creation of new unitary councils as well as afterwards • As criterion 2e states and recognising that Nottingham City Council has received exceptional financial support, proposals must additionally demonstrate how reorganisation may contribute to putting local government in the area on a more sustainable footing, and any assumptions around what arrangements may be necessary to make new structures viable <p>The joint plan has indicated a high level of debt amongst some authorities. As per criterion 2f, proposals should set out how debt can be managed locally, including as part of efficiencies possible through reorganisation. This could include appraisal of total borrowing and debt servicing costs within new structures (and assessment of affordability against funding/operational costs), and the potential for rationalisation of surplus operational assets.</p> <p>For options that have implications for Nottingham City, we would welcome your analysis of any impacts for the operation of the tram PFI contract & street lighting PFI.</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 criteria 3c you may therefore 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 adults and children's care services? Is there a differential impact on the number of care users and infrastructure to support them among the different options? How will quality of service
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	<p>be maintained or where necessary improved in each option?</p> <ul style="list-style-type: none"> • 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 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 note the initial thinking on opportunities for public service reform set out in the interim plan and the steps taken to explore these with strategic partners as part of your engagement on local government reorganisation. We would encourage you to provide further details on how your proposal(s) would maximise these opportunities, so that we can explore how best to support your efforts.</p>
<p>Include indicative costs and arrangements in relation to any options including planning for future service transformation opportunities.</p> <p>Relevant criteria: 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</p>	<p>We welcome initial thinking on opportunities for service transformation and back-office efficiencies and note the history of local authorities working together in the area. We also welcome the commitment to multi-agency working and a focus on prevention and early intervention across the joint plan submitted.</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 more detailed analysis on expected transition and/or disaggregation costs and potential efficiencies of

<p>receipts that can support authorities in taking forward transformation and invest-to-save projects.</p>	<p>proposals. This could include clarity on methodology, assumptions, data used, what year these may apply and why these are appropriate.</p> <ul style="list-style-type: none"> • 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 note the financial pressures that councils are facing. It would be helpful if detail on the councils' financial positions and further modelling is set out in the final proposal(s).</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>Relevant criteria: 6) New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.</p>	<p>We note the initial thinking on councillor numbers and that detailed analysis will be undertaken during the next phase of the work, and ahead of the deadline for final submissions in November. We will share these initial assumptions 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>We note the planned work on local engagement models that will take place after the interim plan submission. 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 final proposal(s) we would welcome detail on your plans for neighbourhood-based governance, the</p>

	impact on parish councils, and the role of formal neighbourhood partnerships and Area Committees.
<p>Include early views on how new structures will support devolution ambitions.</p> <p>Relevant Criteria: 5) New unitary structures must support devolution arrangements.</p>	<p>We note the benefits and opportunities that local government reorganisation provides in relation to the EMCCA, as outlined in your interim plan. For example, the plan highlights planning, health and integrated care as areas in which local government reorganisation would have a benefit to the delivery of EMCCA's priorities.</p> <p>Further information would be helpful on the implications of the proposed local government reorganisation options for the governance arrangements in EMCCA. It would also be helpful to outline how each option would interact with EMCCA and best benefit the local community. We would also recommend consulting with the Mayor of EMCCA and note that you indicate that formal engagement with the mayor will take place in the next phase.</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: 6a&b) new unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment</p>	<p>We welcome the commitment to undertaking engagement activities over the spring and summer to ensure that proposals to be submitted to Government in November meet local need and are informed by local views, including your intent to hold a public consultation on this topic.</p> <p>It is for you to decide how best to engage locally in a meaningful and constructive way with residents, the voluntary sector, Neighbourhood Boards, local community groups and councils, public sector providers such as health, police and fire, and local businesses to inform your proposal.</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>
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>We note your initial thinking on your approach to preparing proposals. We recognise that work is ongoing to consider the costs of this work and of standing up an implementation team.</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>Relevant criteria: 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 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: 4 a-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>We welcome the steps taken to facilitate joint working across the area (see criterion 4). Continuing 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.</p> <p>This will enable you to develop a robust shared evidence base to underpin your final proposal(s) (see criteria 1c). 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> <p>We would expect the final proposal(s) to have regard to the implications for the whole invitation area and mayoral strategic authority area.</p>