

Dear Chair and Committee members

10th February 2025

**Housing Communities and Local Government Committee: Evidence Session on the English
Devolution White Paper, 28th January 2025**

In regard to your committee's evidence session on the above subject, there is still some need for clarification of the source and evidence for the figure of half-a-million population, for new unitary councils, that is quoted in the white paper and that has been used by the minister.

The source of that figure is not quite as straight-forward as is now beginning to emerge from questions put to the minister and the department. But, I would like to set out the journey toward the construction of half-a-million population for new unitary councils of which there are a number of steps.

1. Two answers to parliamentary questions to the minister (see links): in the first answer to a direct question about the evidential base for the figure, the minister does not state the source requested.

<https://questions-statements.parliament.uk/written-questions/detail/2024-12-18/21007>

In the second answer the minister presents a PWC report – Evaluating the Importance of scale in proposals for local government reorganisation (2020) - as the source for savings.

<https://questions-statements.parliament.uk/written-questions/detail/2024-12-16/20129>

The PWC report 2020 was commissioned by the County Council Network and states:

'Much debate has taken place as to the optimum size of the unitary authorities. Drawing on previous research from 2006, a population threshold of 300,000 to 800,000 has commonly been cited. While the government is yet to formally set out its position, the most recent official Ministerial statement on unitary population size was made in June and outlined that unitary councils are expected to be "substantially in excess of 300-400,000". It is anticipated

that the White Paper will provide further details on the criteria for unitary proposals'. (PWC for the CCN, 2020 p13)

That report therefore does not mention half-a-million as a population figure but rather, it mentions two figures in two different places 300,00 to 400,000 and 300,000 to 800,000 (p:4, p:13)'.

The report does not point out any of the substantial body of independent evidence, stretching back decades, which suggests size is not guaranteed to provide the returns suggested by those seeking unitarisation. The findings of independent academic research show that there are no consistent or conclusive results that demonstrate that increases in council size guarantee improvements in efficiency, effectiveness and performance. Nor are there any consistent or conclusive results that justify the belief that larger councils are always more efficient, effective, cheaper or a better option in the provision of public services than smaller units of local government. The literature is contradictory, with inconsistent findings on this matter.

But, the research and literature is more consistent in findings that increasing the population or geographical scale of local government has a damaging effect on democratic criteria, such as, for example: electoral turnout, public trust in councillors and officials, contact between citizens and councils and community identity.

Thus, the evidence about the consequences of increases in local government size on cost and efficiency is not sufficient to justify massive territorial upheaval and the reorganisation proposed in the white paper, and certainly not based on one report alone.

The PWC report (2020) was published in the same year as another report commissioned by the County Council Network: Making Counties Count (Henham Strategy, 2020). The Henham Strategy report urged the government, at the time, to create unitary councils of a minimum of 400,000 with no maximum population limit. It develops this figure from ministerial statements from 2016 which suggest unitaries should be 300,000 or above. Also, on page 34 the report quotes the then Local Government Minister, Simon Clarke, as stating unitaries should be 'substantially in excess of 300k-400k'. No source for this figure is given by the then minister though.

It appears that the government has taken the two CCN commissioned reports and used these to create a figure which could mean not only abolishing districts, but creating a series of meaningless

sub-county unitary councils from those counties with populations over half-a-million, simply to achieve the half-a-million required population.

It is worthy of note that the current government, which did not mention local government reorganisation in its manifesto for the last general election, is pursuing a long-standing policy agenda of previous governments, but seemed to have reached for a higher population figure. It is reasonable to ask why this policy has been introduced so soon after a general election and what is the real source of the half-a-million population figure as it does not appear in the PWC (2020) report.

2. The next step is the response from the Ministry of Housing, Communities and Local Government to three FOI requests asked by the DCN.

What is interesting in the responses (links below) is that in two of the three questions the PWC report is noted as a source, but in FOI 3 (below) a response of a public interest defence for withholding 'other' documents and material is also used. It would be fascinating to know what that material is and why it is so important to withhold it. What does that 'other' material include, what is the evidence base used and what is the methodology? There is a range of other questions that could also be asked. The lack of public openness and transparency, on the part of the ministry, about the real source of the population figure used for new unitary councils, makes it impossible to fully critique the government's proposals.

The links to the FOI responses are here:

1.

[Impact of local government reorganisation - a Freedom of Information request to Ministry of Housing, Communities and Local Government - WhatDoTheyKnow](#)

2.

[Analysis of local government reorganisation costs in England - a Freedom of Information request to Ministry of Housing, Communities and Local Government - WhatDoTheyKnow](#)

3.

[Analysis of 500,000 population size for new unitaries - a Freedom of Information request to Ministry of Housing, Communities and Local Government - WhatDoTheyKnow](#)

3. The third step is that previous governments and now the current Government have alighted on the figure of up to 500,000, but there is still the mystery of where this originates which is not fully solved by reference to the PWC report of 2020.

Various oscillating figures for unitary council populations have been proposed but it is a long-standing objective of the ministry to increase the size of councils and reduce their number (including reducing the number of councillors). It is as though the 1974 reorganisation is seen, by the centre, as unfinished business. The centre's objective for increasing the size of councils can be traced back to the Redcliffe-Maud report of 1969, which suggested that England should have only 58 unitary councils - which today would give an average population of just shy of a million.

So, the answer for the source of the figure rests in the Redcliffe-Maud report even if various ministers quoting figures may be unaware of this potential source. While the Redcliffe-Maud report concluded that there was no firm rule about maximum population sizes, it went on to suggest a range of '250,000 to not much above 1,000,000' (p73 para 276).

It can be concluded that these very broad figures are the original source. We can be thankful that we are only at a staging point in that journey. But, the current reorganisation proposals contained in the white paper leaves open many questions about existing unitaries – including metropolitan and London Boroughs – that are currently well below the half-a-million figure. Are they next in line for reorganisation? Unless of course the defence, found in Redcliffe-Maud, of a 250,000 population is brought into play and, if it is, why can that figure not be applied to existing districts?

As a result of these stages above a number of questions to the minister would reveal more of the centre's thinking on the matter:

1. Why, as local government reorganisation did not appear in the Labour Party manifesto for the 2024 general election, was it found necessary to announce the proposals in a white paper within five months of the election?
2. Why is such a rushed timetable necessary for the completion of devolution deals and local government reorganisation, when a more sensible timetable would enable local government to respond to reorganisation in a measured, balanced and evidentially based way as well as having time to address the other policy demands made of it by the government?
3. The white paper and its focus on devolution reads more as an industrial strategy rather than a policy for local government. Why then is it necessary to reorganise local government to fit one central policy priority and what happens when, and if, that priority changes?
4. As the PWC report of 2020 does not mention specifically a population figure of half-a-million for new unitaries, what is the exact source of that figure?

5. What material, documentation and evidence is the ministry using, for the half-a-million population, but which they refuse to make public in response to the FoI requests? What is the methodology employed in that documentation?
6. What alternative reports, evidence and material did the ministry and the minister consider and explore which casts doubt on the notion that an optimum size for local government exists? Did the ministry only consult and seek evidence that supported a pre-existing policy and fail to consider any alternative data or evidence?
7. If the ministry did consider alternative data on local government size which casts doubt on an optimum figure, why was that evidence rejected?
8. Will county councils with populations above half-a-million be divided into sub-county unitaries to reach, where possible, the half-a-million figure?

Much of the evidence which casts doubt on the existence of an optimum size for local government and shows that local democracy suffers as a result of size increases is set out in Leach and Copus (2023). The link to this publication is here:

<https://link.springer.com/book/10.1007/978-3-031-32819-0>

Finally, I have attached two reports which present counter information to the notion of an ideal size for local government.

I hope the information contained in this letter is of value to the committee and its inquiry.

Yours Faithfully

A handwritten signature in black ink, appearing to read 'Colin Copus', written in a cursive style.

Professor Colin Copus