



Ministry of Housing,
Communities &
Local Government

7 May 2025

LOCAL GOVERNMENT REORGANISATION
INTERIM PLAN FEEDBACK: WEST SUSSEX

To the Chief Executives of:
Adur District Council
Arun District Council
Chichester District Council
Crawley Borough Council
Horsham District Council
Mid Sussex District Council
West Sussex County Council
Worthing Borough 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 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.

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 documents submitted by West Sussex councils:

- the West Sussex Local Government Reorganisation interim submission submitted by Crawley on behalf of all West Sussex Leaders
- the letter with the subject, maximising the growth of the Gatwick area through Devolution and Local Government Reorganisation, submitted by Crawley Borough Council and Reigate and Banstead Borough 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; and
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 of which can be found at [Letter: West Sussex – 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 West Sussex. This feedback does not seek to approve or discount any option, 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 proposals. In addition, Chris Lowry has been appointed as your MHCLG point person and will be ready to engage with the whole area and able to support your engagement with government.

We recognise that all final proposals will need to consider the implications of any model of unitary government for the proposed Sussex and Brighton Mayoral Strategic Authority (MSA). We are providing written feedback to each invitation area 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.

Summary of Feedback:

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

1. We recognise that you are considering generic options at this stage, given interdependencies with Brighton and Hove and Crawley/Reigate and Banstead plans in particular. **Further detail would be welcome on how the preferred new structures would support arrangements for the proposed Sussex and Brighton Mayoral Strategic Authority (MSA) (as per criterion 5)**, in terms of how benefits of mayoral devolution will be achieved for local communities. In this regard, it will be helpful for proposals to have regard to the model of unitary government that is proposed across the whole Sussex and Brighton area, and we welcome your intention to collaborate with partners to create proposals that will enable a sensible solution for both areas in the context of the MSA.

As included in the feedback to Reigate and Banstead, the Crawley and Reigate and Banstead proposal does not outline a suggested devolution geography for the new proposed unitary. Under criterion 5, if taking this forward, we would ask for information on how the proposal would unlock devolution for the wider area, particularly in the context of Surrey, and of the proposed Sussex and Brighton MSA.

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. In some of the options you are considering populations that would be 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. We welcome steps taken to come together to prepare proposals, as per criterion 4:
 - a. **Effective collaboration between all councils across the invitation area and wider proposed Sussex and Brighton MSA 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 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 best meets the assessment criteria in the invitation letter, compared to any alternatives.**

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. Population size criterion

You asked for clarity around the 500,000 population size criterion and whether there is an upper or lower limit for population size for proposed new unitary councils. 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. Interactions with neighbouring invitation areas

We welcome the collaborative approach taken to the interim plan by councils in West Sussex. We also welcome the approach to data sharing set out in your interim plan with a view to aligning options with neighbouring areas as they evolve. We note the request in your letter for guidance on the implications of proposals from neighbouring invitation areas that may impact West Sussex, and the assumptions that you are using for Brighton and Hove listed in your barriers and challenges. As you rightly note, any council within the invitation area may submit a proposal for unitary local government across that area that it believes is in the best interest of the whole area.

A) Brighton and Hove

You asked whether Brighton and Hove would be compelled to grow. As set out above, in terms of population size and boundaries, proposals should set out what makes sense for that area and provide a rationale for that.

Where a proposal is put forward that has an impact on a neighbouring invitation area, we would recommend that the impacts of the proposals for both areas are set out. For example, you mention the consideration from Brighton and Hove of the potential to extend the city boundary into West Sussex. Should there be any impacts on West Sussex of any final proposals from Brighton and Hove, we would recommend that the implications for West Sussex are considered and set out in those proposals.

Further information on boundary changes is set out in the response to 4 below.

B) Crawley and Reigate and Banstead

Should Reigate and Banstead put forward a proposal that includes part of West Sussex, then that decision would be taken to a Surrey timetable. Where a proposal is put forward that includes the disaggregation of services in West Sussex, the implications of this would be considered.

Under criterion 5, we would ask for information on how the proposal would unlock devolution for the wider area, particularly in the context of Surrey and of the proposed Sussex and Brighton MSA.

3. Interaction with wider government policies and reforms

A) Local Government Finance Reforms

You asked when more clarity on the nature of the local government funding review will be available.

Government recently consulted on finance reforms and confirmed that some transitional protections will be in place to support areas to their new allocations.

Further details on finance 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.

B) Implementation of planning changes

You asked for further clarity on government's expectations with respect to the design of the mayoral strategic authority, new unitaries and the implementation of the new planning regime.

We remain committed to ensuring universal coverage of up-to-date local plans as quickly as possible, so strategic planning reform proposals should not be used as a reason to delay the preparation of local plans.

The legal status of local plans is not impacted by local government reorganisation. Where reorganisation occurs, new unitary authorities are expected to promptly prepare a local plan covering the whole of their area. Until that new local plan is adopted, existing constituent local plans remain in force as part of the development plan for their area. New unitary authorities have the discretion to progress any emerging constituent local plans.

We are aware that for areas undergoing local government reorganisation and devolution there will be a period of transition where responsibility for spatial

development strategy might transfer between different authorities. We are seeking powers in the Planning and Infrastructure Bill to complement existing powers to make regulations for transitional arrangements when scenarios such as this occur.

C) English Devolution Bill

You asked about the potential impacts of the English Devolution Bill on planning for local government reorganisation. The landmark English Devolution Bill will deliver changes to the law to make the devolution framework a reality and ensure local leaders across the country have the levers they need to make a difference. The Bill will be introduced when Parliamentary time allows. Once published if you feel there are any impacts, we encourage you to discuss them with Chris Lowry, as your MHCLG point person.

4. Changes to Borough and District Boundaries

You asked about capacity for the LGBCE to support any potential boundary changes and the level of boundary change that will be acceptable.

As the Invitation sets out, boundary changes are possible, but that “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 on a case-by-case.

5. Preparatory phase funding

You asked for further information on capacity funding associated with local government reorganisation. £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.

ANNEX A: Detailed feedback on asks for interim plan

Ask - Interim Plan	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: 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>&</p> <p>2 a-f) - Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks.</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 West Sussex and recognise that this is subject to further work. 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>We also recognise the dependencies outlined in the plan, with proposals being considered by Brighton and Hove and Crawley and Reigate and Banstead.</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>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.</p> <p>We welcome the approach to data sharing set out in your interim plan with a view to aligning options with neighbouring areas as they evolve and in the context of devolution for the wider area.</p> <p>Where there are proposed boundary changes, the proposal 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>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 final proposals 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 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 financial analysis will start once options for the geography of the proposals have narrowed. 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
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	<p>be available for rationalisation of potentially saleable assets</p> <ul style="list-style-type: none"> • 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 criterion 2e states and recognising that Worthing Borough Council has received Exceptional Financial Support, proposals must additionally demonstrate how reorganisation may contribute to putting local government in the area as a whole on a more sustainable footing, and any assumptions around what arrangements may be necessary to make new structures viable <p>For a two unitary council option, and 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 for public safety. Under 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 are the potential impacts on services in the plan outlined by Crawley and Reigate and Banstead? For example, how will police and fire governance be addressed? • what a two unitary option would 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 from the different options?
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	<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 school 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 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>
<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 receipts that can support authorities in taking forward transformation and invest-to-save projects</p>	<p>We welcome initial thinking on the service transformation and back-office efficiencies referenced. In all final proposals further detail would be helpful on these and other potential service transformation opportunities and invest-to-save projects from unitarisation across a range of services - e.g. for front line services, and whether different options provide different opportunities for back-office efficiency savings.</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 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 will different options provide different opportunities for back-office efficiency savings?

	<ul style="list-style-type: none"> • 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 estimate of the transition costs outlined in the plan and your note about the financial challenges that councils are facing. It would be helpful if detail on the councils' financial positions and further modelling is set out in detail in the final proposal.</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 welcome the commitments to preserve representation of place for communities and to tailor arrangements based on local characteristics and needs.</p> <p>New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.</p> <p>Additional details on how 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 impact on parish councils, and thoughts about formal neighbourhood partnerships and area committees.</p>
<p>Include early views on how new structures will support devolution ambitions.</p> <p>Relevant criteria: 5a-c) New unitary structures must support devolution arrangements.</p>	<p>Further detail would be welcome in the final proposal(s) on how the proposed new structures would support arrangements for the proposed Sussex and Brighton Mayoral Strategic Authority (MSA).</p> <p>We welcome your intention to collaborate and share data with partners to enable you to work towards local government reorganisation proposals that will enable</p>

	<p>a sensible solution for both areas in the context of the proposed MSA.</p> <p>Across all proposals, looking towards a potential future MSA for Sussex and Brighton, it would be beneficial to provide an assessment that outlines if there are benefits and disadvantages in how options would interact with an MSA and best benefit the local community, including meeting devolution statutory tests.</p> <p>The Crawley and Reigate and Banstead proposal does not outline a proposed devolution geography for the new proposed unitary. Under criterion 5, we would ask for information on how the proposal would unlock devolution for the wider area, particularly in the context of Surrey, and the proposed Sussex and Brighton MSA.</p> <p>More detail would be welcome on the implications of the various local government reorganisation options for the timelines and management of devolution across the Sussex and Brighton area. While we cannot pre-judge devolution decisions, we are happy to discuss further any eventual transition period as the new unitary authorities and potential MSA are established.</p> <p>We would welcome continued engagement with the Police and Crime Commissioner, Members of Parliament and wider local stakeholders as you continue to develop your proposal(s).</p> <p>To note, an MSA is the same as a Mayoral Combined Authority or Mayoral Combined County Authority.</p>
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<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 your interim update against criterion 6 and recognise the limitations on local engagement to date. It is for you to decide how best to engage locally in a meaningful and constructive way with residents, voluntary sector, local community groups and councils, public sector providers such health, police and fire, and local businesses to inform your proposals.</p> <p>For any option for two unitary councils, you may wish to engage in particular with those who may be affected by disaggregation of services. It would be helpful to see detail that demonstrates how local ideas and views have been incorporated into any final proposal.</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 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 note and welcome the collaborative approach taken to implementation funding across West Sussex.</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.</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 discussions as this work moves forward and to help balance the decisions needed now to maintain service delivery and</p>	<p>We welcome the ways of working together outlined in the interim plan and the collaborative approach taken by councils.</p> <p>Effective collaboration between all councils in the invitation area, and the proposed mayoral strategic authority area will be crucial; areas will need to build strong relationships and agree ways of working, including around effective data sharing.</p>

<p>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>This will enable you to develop a robust shared evidence base to underpin final proposals (see criterion 1c). We recommend that final proposals 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, proposed Mayoral Strategic Authority area and/or neighbouring invitation areas where proposal(s) overlap.</p>
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