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Chapter 2: Determining local authority funding allocations

1 What are your views on the updated SFA resulting in zero allocations, and the use of mitigations to avoid zero allocations?

What are your views on the updated SFA resulting in zero allocations, and the use of mitigations to avoid zero allocations?:

RSN does not support any allocations for either SFA or RSG that are below zero. The system should be set up so that every authority has a positive allocation. Zero or below-zero allocations indicates that an authority is not getting any grant support from central government, or even that locally raised council tax is being used to fund other councils elsewhere in the country.

2 Do you agree with how the government proposes to determine the Council of the Isles of Scilly's Settlement Funding Assessment?

Agree

Please provide any additional information, including any explanation or evidence for your response.:

We agree that funding for the Isles of Scilly should be determined based on a separate process. Any decisions on the Isles of Scilly will not affect other local authorities because the scale is so small.
However, we do not agree that the Greater London Authority's funding should be determined in this way. The GLA represents a very significant proportion of the overall local government settlement, and it should be treated in the same way as other local authorities.

Chapter 3: Funding Simplification

3 Do you agree with the government's plans to simplify the grant landscape?

Agree

Please provide any additional information, including any explanation or evidence for your response.:

RSN generally supports the moves that the government is making towards a simplified funding landscape.
RSN welcomes the full review of local government funding that the government has undertaken. The current funding distribution is significantly out-of-date, and both formulas and data need to be updated. However, whilst some of the proposed changes are favourable to rural authorities, there are many aspects to the proposals that we have concerns about and cannot support.
We are grateful that ministers have noted the specific pressures in rural authorities:
"adjusting for the costs of remoteness faced by rural communities"
"different needs and costs faced by local authorities in urban and rural areas"
"especially those with popular natural attractions, can also face heightened service demands due to high tourist volumes."
There are clearly costs and pressures within rural areas that place additional cost pressures on rural authorities. RSN has made this case very strongly over many years, and we support the proposals that the government has made to recognise those pressures.
RSN supports the changes in the ACA that recognise the specific additional unit costs in rural areas. The Accessibility adjustment reflects the higher unit costs that result from longer travel times to provide services, and authorities in more-remote areas pay higher costs for services because they are less-able to access competitive markets. In themselves, these new adjustments are welcome because they specifically recognise the higher unit costs in rural areas.
There is significant concern about what will actually be included in the formula in respect of "longer travel times to provide services". For instance, how will it be captured that a refuse collection vehicle will need to divert from collections because the vehicle – often a smaller vehicle because of the rural road network -is full and take the collected waste to the disposal point and then return to its collection round? Our member Northumberland County Council has told us that in 2023/24, the council paid out £965,000 per annum in haulage costs. This does not include the cost of collection or directly delivered waste into transfer stations and processing facilities. Of this amount £653,000 was spent bulk hauling waste to various processing facilities outside of the area.
Colleagues from Westmorland and Furness have supplied evidence that average travel time in the South Lakeland area of their authority is more than four times higher compared to Barrow-in-Furness for reablement teams which impact on the total number of calls per 12 hour shift. In South Lakeland it is only possible to deliver and assemble half as many beds compared to that in Barrow-in-Furness
The additional costs associated with rurality are more than just travel time/cost and the features of remoteness refer to in the consultation.
Colleagues from Northumberland County Council state that due to its large size and sparsely spread population centres, it operates 12 household waste recycling centres for its residents. This is a large network of facilities to ensure most residents have good levels of accessibility to this service but comes with a correspondingly high operational cost burden to the council. In contrast neighbouring North Tyneside only operates one site and Newcastle City Council only operates 3 sites. In total Northumberland County council's fixed operating costs for these sites is £2.5 million per annum.
Northumberland County Council further comment that the facilities serving smaller settlements in the most rural parts of the county may have similar fixed operating costs when compared to the larger facilities serving urban areas, but due to the sparsity of the area and low population densities have significantly higher unit cost per tonne of waste handled through the facility - ranging from £241/tonne to £179/tonne, compared to the unit cost range for the larger more urban sites (£29.91/tonne to £75/tonne). They point out that even though Northumberland County Council has a large network of household waste recycling centres the catchment areas for these sites in rural areas can still be very large with many households location rural areas being forced to drive long distances to deposit waste (an example of a 42-mile return trip is given).
In respect of their Public Health Addiction Services Westmorland and Furness Council tell us "Funding does not take into account the cost of delivering the range of addictions services to a rural population, and Westmorland & Furness receives significantly less than more urban neighbours where many clients can access a more affordable walk-in service.
Recruitment and retention of staff is affected by travel both to and between multiple treatment hubs, with associated costs to the service (agency staff, repeated recruitment rounds etc.), and travel costs for staff team are high. A larger number of buildings is required to run a service than in areas with a smaller geography (3 hub sites) and people who live in the more highly populated areas of Westmorland & Furness such as Barrow and Kendal are better served as they can access the nearest treatment centre, with or without the encouragement of the local recovery staff.
Individuals who struggle with addiction and who live remotely are some of the most vulnerable adults in Westmorland & Furness. Engagement has shown many do not have the physical or financial means to get themselves to an urban treatment centre (Barrow, Kendal, Penrith) for an appointment, never mind the mental health or motivation. Outreach is seen as expensive by the current service and saved for those at highest risk. This creates an inequitable service.
It is difficult to evidence how far service users need to travel, because those who can't do not engage with the service. Tackling 'unmet need' relating to substance use is a huge part of the national agenda – yet without additional funding to plug that gap so the council can afford to take the service to the local communities, it will continue to be a problem in W&F.
We must refer to the issue of Supported Bus Services in rural areas which must be properly reflected in the funding formulae. We cite information from Northumberland County Council as an example of the issues. They say:
"Buses are our most used form of public transport and an essential resource for people across both Northumberland and our region, improved bus services are a key enabler of our strategic objectives particularly as they relate to tackling inequalities and driving economic growth by connecting people to employment, education, healthcare and social destinations. Buses are often the only public transport option and a lifeline for those without private cars, with over 50% of bus users having no alternative transport.
As of the 1st January 2025 Northumberland County Council provides financial support for 60 secured services. These cover both conventional bus and community transport services, funded from core budgets, partner contributions and Bus Service Improvement Plan (BSIP) funding. Gross funding of supported services for the 2024/25 financial year is expected to cost approximately £5.5 million.
Northumberland is home to over 324,000 people and covers an area of 5,013km2. 97% of Northumberland is classed as rural, the county is sparsely populated with 63 people per km2. This presents difficulties in delivering public transport across a largely rural county. Fig.1 shows the commercial bus network operating across Northumberland this network provides a good level of services frequency and travel options for half of the County's population who live in 3% of urban land in the south east of the County. The network inter-connects key market towns in south east Northumberland as well as providing excellent links into the city of Newcastle.
However, as we move away from the relatively densely populated south east Northumberland commercial bus activity significantly reduces as the

economics of serving sparsely populated areas and the longer distances between significant settlement means it is not commercially viable for operators to provide services at the frequency delivered in more urban areas. In order to ensure that these underserved areas have adequate public transport Northumberland County Council funds 60 services these primarily operating in the north and west of the county providing key transport links that would not otherwise exist without the financial support provided by Northumberland County Council and its partners.
Any future funding formula needs to factor sparsity/rurality into its calculation as moving towards a deprivation-based metric will adversely affect Northumberland's largely rural communities. In Northumberland it cost between £0.00-£2.50 subsidy per passenger to fund a predominantly urban bus service, this figure rises to £4.00-£7.00 per passenger to deliver a bus service in a largely rural area.
Whilst Northumberland has both urban and rural deprivation, it is sparsity/rurality that is the biggest barrier to delivering a fit for purpose public transport network. Any cuts to funding will lead to the removal of services, adversely affecting the users and communities served. Reducing/removing supported public transport from rural areas will compound the inequalities that already exist and hinder economic growth.
There has been a general movement of funding away from rural areas in recent years. The abolition from 2025/26 of Rural Services Delivery Grant (RSDG) was extremely disappointing and means that rural authorities are going into these reforms in 2026-27 from a lower funding base in 2025-26.
From 2024/25 to 2025/26 the 'gap' between Government Funded Spending Power per head for Predominantly Rural areas compared to Predominantly Urban areas increased by over 18% (from £141.71 per head to £167.59 per head),
There are some aspects of the funding reforms that RSN welcomes. Generally, the concept of moving towards flatter formulas is a good one, as outlined in the 2018 consultation. We support the government's intention of building on those reforms. However, it is clear that the proposals move away from the concept outlined in that consultation and introduce new indicators and weightings that are not justified. Of real concern, is the weighting for deprivation (based on IMD) in the Foundation formula.
It is welcome that the grants within Core Spending Power (CSP) are being rolled into SFA, so that the number of allocations is reduced. We also welcome the creation of the new consolidated grants outside the settlement. However, there are a few points we would like to raise:
- RSN did not support abolishing the Rural Services Delivery Grant (RSDG) in 2025-26. This grant should have been rolled into the SFA baseline in 2026-27, with its distribution preserved. This was a very important grant to many rural authorities. Removing it in 2025/26 has the effect of removing the financial costs from the Transitional Arrangements as part of this Review – that was unreasonable.
- The consolidated grants should be announced with sufficient notice, and ideally over 3 years. There should be the same transparency about how the grant allocations have been determined. As far as possible, all the constituent grants within a consolidated grant should be rolled into a single pot. Government departments should not seek to re-introduce complexity into the funding system by trying to set funding targets for authorities, and to measure spending against notional levels of funding. This appears to be the intention of the DHSC, and this is something that we would not support.

Chapter 4: Measuring differences in demand for services

4 Do you agree with the formulae for individual services the government proposes to include?

Disagree

Please provide any additional information, including any explanation or evidence for your response. :

RSN disagrees with the removal of the sparsity indicators within the current Environmental, Protective and Cultural Services (EPCS) and Adult Social Care formulas. RSN has made a strong case for the continued use of these indicators within the funding formulas. They provide essential funding for the additional costs of providing services in rural areas. With the abolition of RSDG, these indicators are even more important.
Their replacement with the Accessibility and Remoteness uplifts within the ACA is only a partial solution. The ACA uplifts only provide additional funding for the higher unit costs within rural areas. Travel times are certainly higher in rural areas, and these do lead to higher unit costs. We welcome the introduction of the Accessibility uplift – but it does not cover the wider demand pressures or the unmet need within rural areas.
When the move to the Accessibility uplift was first proposed in 2017, RSN opposed the change on the grounds that it would result in a narrower approach to sparsity and rurality. We still stand by this view on the relative merits of using sparsity indicators compared to ACA adjustments. As a result of this narrower focus on rural costs, the funding directed towards some of the most sparsely populated authorities has reduced substantially.
Notwithstanding the decision to remove the sparsity indicators, the general approach to the funding formulas is an improvement on the current methodology. The starting point for this funding review has been the 2018 consultation. The guiding principle in this consultation was to create a simpler funding regime. This is a principle that RSN strongly supports. Where the government has followed this principle, the resulting formulas have generally been an improvement.
RSN also supports the new formulas for Adult Social Care and, with some important reservations, in Children's Social Care. Both new formulas have built on very thorough evidence and research and have been developed by independent academics. RSN supports the use of independent research to underpin new formulas. Our main concern is with the new Children's RNF, where some rural authorities appear to be receiving less funding than they currently do, and substantially less funding than their current expenditure levels. There is also inconsistent treatment of similar rural authorities. DfE needs to do more to explain how this new formula has been developed, and why it results in such apparently irrational changes in funding.
Separately we also need to see explained the adjustments that have been made for "differences in local geography, such as bodies of water." Many rural authorities will have a range of different geographical features that affect travel distances (e.g. mountains, moorland).
We do not support the new Temporary Accommodation RNF, or the methodology used to calculate it.

5 Do you agree with the areas of need the government proposes to no longer include in the assessment through the Foundation Formula?

Agree

Please provide any additional information, including any explanation or evidence for your response. :

In broad terms, RSN supports the simplification of the funding system, but this has to be done with care. For some authorities, particularly shire district councils, the impact of losing some of these smaller RNFs is very significant indeed. In the current funding formula, introduced in 2013-14, the flood defence and coast protection RNFs provide 18.4% of Boston's total RNF, 17.7% of South Holland's and 15.5% of East Lindsey's. These are really substantial amounts and make a very significant contribution to these vital services. We understand that the government wishes to simplify the funding system and to remove RNFs that have uneven distribution, but this should not be done at the expense of significantly disadvantaging a small number of authorities. Before any decision is made to remove these RNFs, it is essential that the government makes clear how it will fund these services for those authorities who are most affected.

6 Do you agree with the government’s approach to calculating the control total shares for the relative needs formulae?

Agree

Please provide any additional information, including any explanation or evidence for your response. :

Being pragmatic, the RSN supports the approach that has been taken. Control totals should be based on actual spending patterns, so that the distribution of funding reflects how resources are distributed locally. We would support the use of the latest actuals or outturn data from local authorities (e.g. 2023-24 RO Form, post-audit data). It is very important this data is as complete as possible and has been subject to checking and validation by external audit. That said, the amounts rural councils have been able to spend due to financial constraints through unfair government funding is not and should not be taken as a reflection of the need for those services. Unmet need is a significant factor. Neither should the amount a rural Council is able to spend on a service be taken as an indication that the level of service supported by that amount of expenditure is the same as that which can be provided for that same amount or even less) in non-rural Councils. It costs more to provide services across rural areas.

Chapter 5: Measuring differences in the cost of delivering services

7 Do you agree with the Labour Cost Adjustment (LCA) and Rates Cost Adjustment (RCA) equations set out in this chapter?

Agree

Please provide any additional information, including any explanation or evidence for your response. :

RSN supports the methodology that has been used to determine the LCA and RCA adjustments. We would like to have greater assurance about sample sizes used for LCA and to ensure that the data that is being collected is representative of the local labour market.

8 What are your views on the proposed approach to the Area Cost Adjustment (ACA)?

What are your views on the proposed approach to the Area Cost Adjustment?:

RSN supports the inclusion of the Accessibility and Remoteness adjustments, as well as the general approach to updating the LCA and RCA adjustments. We do not support the individual ACAs, however. More work needs to be done to determine whether these individual ACAs better reflect local labour market conditions than the current sub-regional ACAs. Local authorities do operate in a pool of labour that extends beyond their boundaries, and labour costs are difficult to measure in small areas, particularly for some of the rural district councils. RSN also does not support the removal of the lower limit on labour costs. This lower limit helped to support many of the rural authorities with the lowest labour costs.

9 Do you agree or disagree with the inclusion of the Remoteness Adjustment?

Agree

Do you have any evidence to support or contradict the theory that rural areas face additional costs due to separation from major markets? :

RSN agrees with the proposal to include a Remoteness adjustment. This is a fundamental adjustment to reflects the higher costs that are incurred in remote authorities that are more-distant from larger markets, which are typically in more-urban areas. As the consultation paper says, there is a strong theoretical case, and we believe there are also very strong case studies to support the case.
Markets do not function as effectively in remote areas because competition is less strong, and there are often fewer providers available for services, particularly for the larger services where there are fewer providers nationally. Rural authorities report that there can often be very few providers bidding for a service; and also, that if a provider becomes dominant in a service it is difficult to attract other providers to ensure that prices remain competitive. In addition, supplies have to be transported over longer distances or can only be purchased from local providers who have a dominant market position locally (e.g. supplies for highways maintenance, such as aggregate).
As we said in response to Question 3 above, the additional costs associated with rurality are more than just travel time/cost and the features of remoteness refer to in the consultation.
Remote local authorities also have fewer options available to place children and adults in residential settings. In many cases, there will be fewer providers close by across county borders that can be used where local providers are not available or are fully utilised. Obviously, this is particularly the case where an authority has a coastline (e.g. Cornwall, Devon) but is also the case where neighbouring authorities have also very remote and sparsely populated (e.g. Northumberland, Cumberland).
By way of evidence the Executive Director of Adults for Northumberland County Council in Northumberland states that they set different rates for home care services in each of three kinds of area: “urban” areas, “rural” areas, and the “very rural” areas of sparsest population. They have learned from experience over the years that three categories correspond to significant differences in the rates at which they can secure home care.
The rates which they pay are based on a combination of data from homecare providers about travel times between visits and their accumulated experience of which areas it is hardest to arrange services in. They explain that this in part is because of demographic factors – in some of the most rural areas, there is a growing imbalance between the population of older people in the age range where care needs are most common and the population of working age adults.
On average, the hourly-equivalent rates which they pay in each kind of area are as follows (they are the weighted average hourly-equivalent rates, based on the actual care plans of service users in early July 2025).
“Urban” areas – £26.08
“Rural” areas – £30.55
“Very rural” areas – £49.90
As can be seen there is an over 91% increase in the hourly rates paid between the urban areas of Northumberland and the very rural - and a circa 17%

increase between the urban and rural areas. This is a clear demonstration of the cost implications from 'remoteness'
Staffordshire County Council reports that "Market Competition is limited in more remote areas, particularly for specialist services, leading to higher prices and fewer options. In some rural parts of the county, we face challenges in securing providers at all, especially for home care and SEND transport"

East Riding of Yorkshire have provided the following information:
• East Riding have had to set home care hourly rates in three zones, which correspond to rurality. The rates take account of the travel time required to reach isolated villages and travel back from there to the next call on a rota. The difference between the hourly rate in zone 3 (most rural) and zone 1 is 27%. Even with these increased rates there are parts of the East Riding area in which home care is still very difficult to source.
• Within the Goods & Services Procurement Category of third party spend, the Council often encounters difficulty in attracting sufficient competitive bids due to the remoteness of delivery location and/or additional costs incurred by suppliers, or a lack of a local presence (depot's and distribution facilities) based in or adjacent to the Council. In the 2024-25 financial period the conversion rate of tenders submitted (when compared to 'expressions of interest') was on average only 32%, i.e. suppliers chose not to submit a bid despite reviewing the Council's tender opportunity. A total of 24% of contracts above the PCR2015/PA2023 threshold for Goods & Services in this period attracted less than the minimum optimal number of competitive tenders (i.e. x3). For contracts below the threshold across all categories, this figure was 33%.
• The accessibility difficulties for both construction tier 1 contractors and their supply chain suppliers, and more specialist construction suppliers working in a largely rural area with a coastline increases the costs of construction labour, plant and materials. In comparison with urban areas there are far fewer local contractors and the logistics involved in travelling to many East Riding market towns and villages increases costs and makes it unattractive for suppliers in neighbouring areas to submit tenders. Sub-contractors invited to tender by large tier 1 contractors will feel pressured to submit quotations, but the extra travelling involved makes it unattractive to them, so they increase their prices accordingly. The Council advertises its contracts via the YORtender portal, this is a free system for suppliers that is used by all the councils in the Yorkshire and Humber region to advertise contract opportunities. The YORtender systems audit trail records how many suppliers express an interest (EOI) in submitting a tender and how many tenders were received. In 2025 for nine construction contracts advertised, including two at over £20m, and two more at over £8m, the average number of EOIs was 34.8 whereas the average number of returned tenders was only 4.4. Generally, suppliers prioritise local projects and decline projects that are further away thereby decreasing competition for rural areas and increasing prices.
• It is estimated that it costs approximately £827,000pa to extend the Adult Skills offer to cover rural communities. This cost is mainly made up of the additional staff and associated travel costs, hire of suitable venues, running of the mobile adult learning centre and delivery of the Kickstart scooter lease programme to enable (mainly young) people to access education and employment opportunities.
• Services requiring visits to repair, maintain or inspect in smaller rural villages for example include litter bin emptying, tree inspections, pothole repairs, street lighting faults, etc can necessitate round trips of over 50km in terms of accessing material suppliers, travel from base depots and travel to waste transfer stations when compared to availability in more compact and better served urban areas. Costs associated with travel time, vehicle numbers and fuel costs and overall influence on productivity are therefore significantly higher.

Another example has been supplied to us by Westmorland and Furness Council in respect of its Independent Advocacy Service for Children & Young People. They report a limited marketplace, with few or no bidders responding to tender opportunities They say "despite provider engagement events prior to tender (intended to stimulate market interest), both contracts have been awarded to the same provider for over the last 10 years. (This is the same provider across both contracts). At the last tender opportunity in October 2022, no bids were received. The incumbent provider indicated that the financial envelope was insufficient and did not reflect inflationary cost increases. Other potential providers reported that it was not feasible to deliver the service within the available budget, particularly as they were not already established in Cumbria. Following the failed procurement, the financial envelope was increased, which resulted in one bid (from the incumbent provider). They say that the same issues apply to their procurement of both Family Help and Support Services and the Adoption Support contracts
Other examples where rural areas face additional costs due to separation from major markets:
Recruitment and retention of permanent social workers: Whilst recruitment of permanent social workers continues to be a national challenge with an increasingly competitive market, feedback from prospective candidates in Herefordshire identifies location, rurality and lack of major road network/transport infrastructure in a rural county as barriers to recruitment meaning that pay rates, even where comparable with other local authorities, are less competitive and attractive.
A social worker role cannot be virtual and requires presence in the county. Particular recruitment challenges in Herefordshire mean that, despite an increased welcome payment, travel and location remain barriers to conversion of agency to permanent; agency workers can cover increased travel costs in the higher rate of pay earnt compared with a permanent salary. Agency staff expenditure represents a significant cost pressure in social care budgets.
Delivery of home care services in a rural county: the delivery of home care services in rural areas of Herefordshire are approx. 15% higher than costs to deliver in urban areas of the county.
Home to school transport services: following a Chief Executive commissioned review of home to school transport costs in Herefordshire, it was identified that fees to the council include charges for 'dead mileage' as a result of the rural nature of the county (Herefordshire is the fourth least densely populated county-level authority in England). Lack of sufficiency of SEND placements means an increase in transportation of pupils to out of county placements, placing additional pressure on council budgets. These factors represents significant additional costs for a rural county in addition to the nationally recognised cost pressures in this area of service delivery.
Procurement activity faces increased challenge in a rural county; factors including limited market capacity and increased costs to deliver services across remote and less populated areas often result in a reduced number of bidders, reduced competition and choice, potentially increased prices and reduced value for money for taxpayers. Procurement data identifies a higher proportion of contracts with just one bid/no bids in rural authorities as a result of these challenges.
Herefordshire Waste collection services: the collection of general waste and recycling in the fourth least densely populated area in England requires a unique approach – a variety of smaller sized collection vehicles including 4x4 vehicles to reach properties not accessible by regular waste collection vehicles results in additional expense for the council. The distance between collections requires an increased number of vehicles compared with an urban area to ensure the frequency of collection rounds and schedules can be maintained to meet local needs. With increasing responsibilities to provide weekly food waste collections from all households from 1 April 2026, the challenge to deliver this service in a way that provides value for money for taxpayers is increased in rural areas.

Chapter 6: Measuring differences in locally available resources

10 Do you agree with the government's proposal to set a notional Council Tax level at the national average level, to achieve the objective of full equalisation?

Agree

Please provide any additional information, including any explanation or evidence for your response. :

RSN supports determining equalisation based on notional Band D rather than actual Band D. It would not be correct to subsidise authorities with low Band D by using actual Band D to equalise council tax.
RSN does not support full equalisation. Council tax is a local tax and some of the locally generated tax should be retained locally. It is also important that some of the growth in taxbase can be retained locally: this incentivises local housing growth and also ensures that some local council tax is available locally to fund the additional services that are required to support local population growth.

11 Do you agree with the government's proposal to fully include the impact of mandatory discounts and exemptions in the measure of taxbase?

Agree

Please provide any additional information, including any explanation or evidence for your response. :

12 Do you agree with the government's proposal to use statistical methods to proxy for the impact of Working Age Local Council Tax Support in the measure of taxbase?

Agree

Please provide any additional information, including any explanation or evidence for your response. :

Agree in principle, subject to the approach adopted. The approach used in the resources adjustment seems reasonable.

13 What are your views on the proposed statistical approach to proxy for the impact of Working Age Local Council Tax Support?

What are your views on the proposed statistical approach to proxy for the impact of Working Age Local Council Tax Support?:

We support the approach. See previous answer.

14 Do you agree with the government's proposal to assume that authorities make no use of their discretionary discount and premium schemes in the measure of taxbase?

Agree

What are your views on the proposed statistical approach to proxy for the impact of Working Age Local Council Tax Support?:

We support the approach proposed in the consultation. Some rural authorities have taken the decision to set a 100% premium on second homes. Many RSN authorities have the highest levels of second homes in the country
The discretion given to councils to charge premiums (including second homes and empty properties) is applied by RSN authorities as part of a wider strategy to help bring long-term empty homes back into use to provide safe, secure and affordable homes and to support councils in increasing the supply of affordable housing and enhancing the sustainability of local communities.
These discretions support councils in a number of ways: additional council tax income charged can be used to mitigate the cost pressures of temporary accommodation arising due to housing insufficiency and/or the premiums serve to incentivise property owners to either bring the buildings back into use or sell, thus increasing the supply of housing for local communities.
The sustainability of communities is important in a rural county; rural areas continue to experience population decline, particularly in younger age groups, as a result of outward migration of younger residents seeking opportunities elsewhere and the aging of existing rural residents.
If the premiums were included in the measure of taxbase, the planned benefits of this discretionary tool would be removed.
The purpose of the premium is to generate additional income to support affordable housing for local residents. It would be inconsistent with this principle to then remove this income via the equalisation methodology. Furthermore, if this were to be the case, then it would disincentivise authorities from using the second homes premium and undermine an important tool for authorities to use when addressing large numbers of second homes.

15 Do you agree with the government's proposal to apply a uniform Council Tax collection rate assumption to all authorities?

Agree

Please provide any additional information, including any explanation or evidence for your response. :

We agree that there should be a uniform collection rates (poor collection should not be rewarded) but it is not reasonable to set this uniform rate at 100%. There will also be some element of council tax income that billing authorities cannot collect, for various reasons. Equalisation should be set on the basis of the amount of council tax that is actually collected. The average collection rate of 95.8% should be applied.

16 Do you agree with the government's proposal to split or allocate the resource adjustment in multi-tier areas according to the average share in council tax receipts in multi-tier areas?

Agree

Please provide any additional information, including any explanation or evidence for your response. :

MHCLG should be clear about how it has taken into account parish precepts, both in the calculation of the average Band D and the tier splits in two-tier areas. Shire district councils should not be disadvantaged if they have relatively large parish precepts in their area

Chapter 7: Running the Business Rates Retention System

17 Noting a potential trade-off of an increased levy charged on business rate growth for some local authorities, do you agree that the level of Safety Net protection should increase for 2026-27?

Agree

Please provide any additional information, including any explanation or evidence for your response. :

Chapter 8: The New Homes Bonus

18 Do you agree with the government's proposal to end the New Homes Bonus in the Local Government Finance Settlement from 2026-27 and return the funding currently allocated to the Bonus to the core Settlement, distributed via the updated Settlement Funding Assessment?

Disagree

Please provide any additional information, including any explanation or evidence for your response. :

NHB is an important way of incentivising house-building in local areas. We accept that the current methodology needed to be refreshed, but that could have been done without abolishing the funding entirely. Various options have been consulted on, and we would like to see the government's response to these proposals rather than simply ruling them all out.

19 What measures could the government use to incentivise local authorities to specifically support affordable and sub-market housing?

What measures could the government use to incentivise local authorities to specifically support affordable and sub-market housing?:

RSN would like to see options developed for a successor to NHB or failing that the ability of local authorities to keep more of the council tax growth generated locally (i.e. via partial equalisation).

Chapter 9: Transitional arrangements and keeping allocations up-to-date

20 Are there any further flexibilities that you think could support local decision-making during the transitional period?

Are there any further flexibilities that you think could support local decision-making during the transitional period?:

NO RSN RESPONSE

21 What are the safeguards that would need to go alongside any additional flexibilities?

What are the safeguards that would need to go alongside any additional flexibilities?:

NO RSN RESPONSE

22 Do you agree or disagree that we should move local authorities to their updated allocations over the three-year multi-year Settlement?

Agree

Please provide any additional information, including the impact this measure could have on local authorities' financial sustainability and service provision. :

RSN agrees that local authorities should be moved to their target funding over the 3 years of the multi-year settlement. The phased damping is a sensible approach and, in theory, ensures that all the gains and losses from the funding reforms are implemented within the period. Some rural authorities are losing significantly, and this approach provides some time for these authorities to adapt. That said 3 years is a relatively short period if a Council's funding is reduced by any significant amount – 5-years would be preferable. Clearly, RSN's preference would be that these authorities did not lose funding share (as we have set out elsewhere within this response), but a phased approach at least ensures some protection.

23 Do you agree or disagree that we should use a funding floor to protect as many local authorities' income as possible, at flat cash in each year of the Settlement?

Disagree

Please provide any additional information, including on: (i) the level of protection or income baseline, considerate of the trade-off with allocating funding according to the updated assessment of need and resources; and (ii) the possible impacts on local authorities' financial sustainability and service provision.:

RSN does not support cash funding floors. The use of funding floors is inconsistent with authorities being moved to their target funding levels within 3 years. Modelling indicates that there will still be considerable funding “cliff edges” between 2028-29 and 2029-30, and this is totally unacceptable. If MHCLG has confidence in the funding targets that have been set for authorities, then it should ensure authorities reach them within 3 years. Not doing so (by having 0% floors in 27-28 and 28-29) suggests that MHCLG do not have confidence in their own process for setting new funding targets.

24 Do you agree or disagree with including projections on residential population?

Disagree

25 Do you agree or disagree with including projections on Council Tax level?

Disagree

26 Do you agree or disagree with including projections on Council Tax base?

Disagree

27 If you agree, what is your preferred method of projecting residential population, Council Tax level and Council Tax base? Please provide any additional information, including any explanation or evidence for your response and any views on technical delivery.

Please provide any additional information, including any explanation or evidence for your response and any views on technical delivery. If you agree, what is your preferred method of projecting residential population, Council Tax level and Council Tax base?:

Residential Population - Population projections are insufficiently robust to be used in the multi-year settlement. If MHCLG does wish to use population projections then ONS should engage with the sector to demonstrate how it will produce projections that are acceptable, and that are consistent with taxbase projections. Recent evidence shows that ONS projections have a poor record at forecasting population levels. MHCLG should consider whether there should be a methodology for correcting population projections where they are significantly different from reality.

Council Tax- Including future increases in Band D pre-judges decisions that authorities will make about changes in council tax in future.

Council Tax Base - RSN does not agree with the use of taxbase projections. Again, taxbase forecasts are too unreliable to be used to determine future funding allocations. They are based on projections, and as a result will reflect past changes in taxbase rather than future changes.
Furthermore, if MHCLG is going to use taxbase projections, it will have to be careful about which elements are used in the projections. It would be inappropriate to include changes in previous years to LCTS, or other discounts.

RSN’s preferred approach would be to have flat projections for council taxbase, population and Band D. There is insufficient evidence to make accurate projections. Changes in population and council tax can be addressed when funding formula allocations are reviewed every 3 years.

Chapter 10: Devolution, local government reorganisation and wider reform

28 Do you agree with the approach proposed to determining allocations for areas which reorganise into a single unitary authority along existing geographic boundaries?

Agree

Please provide any additional information, including any explanation or evidence for your response. :

29 Do you agree that, where areas are reorganising into multiple new unitary authorities, they should agree a proposal for the division of existing funding locally based on any guidance set out by central government?

Agree

Please provide any supporting information, including any further information areas would find helpful in guidance. :

30 Do you agree that the government should work to reduce unnecessary or disproportionate burden created by statutory duties?

Not Answered

If you agree, what specific areas of statutory duties impose significant burden without significant value for residents? Please provide any examples of changes you would like to see to statutory duties, being as specific as possible. :

Staffordshire County Council state that some statutory duties place a disproportionate burden on rural authorities. For example:
• reporting and compliance requirements designed for larger urban councils can be overly complex and resource intensive for smaller rural authorities.
• planning and environmental regulations often require extensive consultation and documentation, even for minor developments, which can be time consuming and costly without delivering proportionate benefits to residents.

SEND and home to school transport legislation represent unavoidable costs for RSN members with exponential increases in demand not matched by increased funding.
The burden of continued and increasing overspends has a further treasury impact for local authorities: money spent, far in excess of funding, means

there are less resources available for investment or to fund internal borrowing. Whilst cumulative deficit DSG balances are held in temporary unusable reserves, until expiry of the current statutory override period, the associated direct or indirect interest cost of this expenditure is passed on to taxpayers through the revenue budget.
Without a practical solution to address SEND funding and a review of legislation which prescribes the statutory responsibilities of local authorities in respect of home to school travel arrangements, many RSN members will have insufficient reserve to mitigate future cumulative DSG deficit balances and will be forced to issue s114 notices regardless of the impact of the Fair Funding Review.

East Riding have highlighted the following issues:
• One area of particular note is the annual Statement of Accounts (SoA). The accounts that councils must produce is required a much overdue overhaul. The whole process must be simplified (through a significant reduction is size and complexity) right the way through from production to the subsequent audit to make it much more streamlined, efficient and value for money. Done right, this could help immensely to ensure greater relevance, transparency and accessibility for local taxpayers. It's also important that we consider how we might be able to use the Statement of Accounts to streamline many of the other reporting requirements we have for government. The SoA, WGA, and RO all report on the same actuals for the financial year, but in different formats. There should only be a requirement to report on these figures in one format, that can then have data pulled appropriately (akin to how the iXBRL format of accounts works for limited companies, with the data being tagged to the relevant government reporting requirement). This could eliminate the requirement for local authorities to report on the same thing in multiple formats. It would help to provide a singular version of the truth, and increase the time available to produce accurate reports.
• The government believes that the data collected (through, for example, the RO forms) is the correct data for publishing reports for the benefit of the public. This does not align with the aims of the Statement of Accounts, where the data is presented differently, but equally for the alleged benefit of the public.
• The government should also consider what changes it can make to the funding regime for local authorities would help. Uncertainty and a lack of transparency from one year to the next means that councils have to dedicate more resource to risk management. Last minute changes to funding, including the introduction of new distribution formula, new grants or sudden cessation of grants is also not helpful. The government should also end funds that need to bid for, and indeed reduce the number of funding pots for a more simplified system of funding.
• One of the single biggest areas of burdensome activity is the requirement to comply with Freedom of Information legislation. This is extremely resource intensive and therefore expensive. The number of requests continue to climb every year. Even if this there is no political will to repeal this legislation, the scope should be reviewed and narrowed. Many requests are simply from business entities looking to use local authority data for commercial ends.

Chapter 11: Sales, fees and charges reform

31 Do you agree with the proposed framework outlined at paragraph 11.2.3 for assessing whether a fee should be changed?

Agree

Please provide any additional information, for example any additional criteria which would strengthen the above assessment framework, and any data which would be used to assess against additional criteria. :

32 The government invites views from respondents on how best to balance the need to maintain fee values and the original policy intent of the fee whilst minimising cost of living impacts for service users.

The government invites views from respondents on how best to balance the need to maintain fee values and the original policy intent of the fee whilst minimising cost of living impacts for service users.:

NO RSN RESPONSE

33 Do you agree that the measures above provide an effective balance between protecting charge payers from excessive increases, while providing authorities with greater control over local revenue raising?

Agree

Please provide a rationale or your response. We are also interested in any further mechanisms which could be applied to fees that are updated or devolved, that will help strike a balance between those objectives.:

34 Do you agree that we should take action to update fees before exploring options to devolve certain fees to local government in the longer term?

Agree

Please provide any additional information, including any explanation or evidence for your response. :

Chapter 12: Design of relative needs formulae

35 Do you agree or disagree that these are the right Relative Needs Indicators? Are there any other Relative Needs Indicators we should consider? Note that we will not be able to add additional indicators for a 2026-27 update.

Agree

Are there any other Relative Needs Indicators we should consider? Note that we will not be able to add additional indicators for a 2026-27 update.:

RSN supports the new RNFs for adult social care. The process for developing the new formulas has been very thorough, and the analysis is based on much more extensive evidence base than was used in the current Adult RNF.

36 Do you agree or disagree with including population projections in the ASC formula, when published, that have been rebased using Census 2021 data?

Disagree

Please provide any additional information, including any explanation or evidence for your response. :

RSN does not agree with using population projections.

37 Do you agree or disagree with our proposal to include a Low-Income Adjustment (LIA) for the older adults component of the ASC RNF model?

Agree

Please provide any additional information, including any explanation or evidence for your response.:

Some account has to be taken of the ability of residents to wholly or partly fund their own care. This is real income that is received by authorities, and which can be used to fund social care provision. Using Band D council tax proportions appears to be a reasonable approach (this should reflect house values, which are an important determinant of the contributions that people might have to make to their own care). However, the income contributions are much more complicated than this, and we would like some reassurance that the proposed methodology is a robust way of reflecting the actual care charges.
This whole subject should be reviewed when the Government determines its response to the present Social Care crisis.

38 Do you agree or disagree that the overall ASC RNF should combine the two component allocation shares using weights derived from the national ASC net current expenditure data on younger and older adults (in this case 2023 to 2024)?

Agree

If you disagree, what other weightings would you use? Please provide details for why you would use these weights and what data it would be based on? :

39 Do you agree that ethnicity should be removed as a variable in the CYPS formula?

Agree

Please explain your reasoning.:

If this approach is supported by the analysis from the researchers, then this would be a reasonable decision

40 Do you agree overall that the new CYPS formula represents an accurate assessment of need for children and family services?

Disagree

Please share any reflections or suggested changes. :

RSN recognises that the research underpinning the new Children's RNF has been thorough and undertaken by independent researchers. But it has resulted in a very different distribution of funding to the current RNF, and some very large variances with actual expenditure per head. We would expect some movement from the current RNF (it is well past it's sell-by date) but the changes in distribution do not appear to be entirely credible. If the new RNF is going to be adopted, DfE (and the independent researchers) will have to do much more work and engagement to demonstrate this to the sector.
Furthermore, changes in funding distribution would make sense if they were underpinned by existing differences in expenditure – but this does not appear to be the case. And some of the most egregious examples are in rural authorities. An example is Herefordshire Council, where its Children's Services RNF has reduced by 13.7% (including the home-to-school transport RNF, which is in the 13-14 RNF). We estimate that the new RNF will provide funding of £1,058 per head. In contrast, Herefordshire is spending £2,019 per head (RO3, 23-24).
These movements do not make any sense, and many other rural authorities (particularly those with very high levels of sparsity) have similar, if less extreme, differences between spending and funding (RNF) per head:
Cumberland: RNF per head £1,249, expenditure per head £2,112
Devon CC: RNF per head £1,005, expenditure per head £1,304
Rutland: RNF per head £629, expenditure per head £1,040
Shropshire: RNF per head £965, expenditure per head £1,280
Given the way the RNF is constructed, it is very difficult to identify which datasets are causing the under-funding in many rural authorities. We would welcome further time with the researchers to discuss this further, or for the researchers to make available the data (at local authority level) so that we can check the data, and understand which datasets understate the demand in rural authorities.

41 Do you believe that the components of daytime population inflow should be weighted to reflect their relative impact on demand for services?

Agree

Please provide any additional information, including any explanation or evidence for your response. :

RSN supports a daytime population element within the Foundation Formula. Many rural authorities have considerable numbers of visitors, particularly those with substantial tourist economies. Visitors have a very significant cost to these rural authorities, and it is correct that the formula compensates these authorities for these costs:
Although these authorities can generate some income from these visitors, the amounts are very insignificant (small amounts of car parking income, for instance). There is a substantial net cost to the authorities.
Costs are particularly high for waste collection and street cleansing, public transport, street management, noise management, planning. With the abolition of the Concessionary Fares RNF, many of these authorities will also have to fund very high concessionary fares payments.
As far as we can see, only domestic visitors are taken into account. For some rural authorities, many of their visitors will not be domestic visitors. It is illogical to exclude non-domestic visitors. Visit Britain's website states "In 2024, the sector experienced modest growth due to an increase in overseas visits to attractions (+6% on 2023) and a decrease in domestic visits (-1% in 2023)".
Even though the datasets might not be very robust, we would like to see the data that is available, and whether it could be used to inform the weightings for visitors.

42 Do you agree with/have any comments on the design of the Foundation Formula?

Disagree

Please provide any additional information, including any explanation or evidence for your response. :

RSN does not support the inclusion of the deprivation uplift. The IMD is not an appropriate measure of deprivation because it is too broad and takes into account measures of deprivation that are outside the scope of local government services. Furthermore, it does not provide sufficient weight to measures of deprivation within rural areas, such as access to services.
We continue to have significant concerns about the use of the IMD to distribute funding in this context. The IMD is a composite index with a range of different domains.
There has been no evidence published by the government to demonstrate that deprivation is the key factor for distributing funding to local government. Indeed, the research undertaken by MHCLG in 2018 suggested that deprivation "was not a major cost driver for the services included in the Foundation Formula". The same research found that population was overwhelmingly the most important factor, driving 88% of the variation of upper-tier costs in the Foundation Formula, and 84% of the lower-tier costs. What evidence has the department seen since 2018 that would lead it to change its conclusions about the relative importance of deprivation for distributing general funding to local government?
Rural deprivation is masked by existing deprivation measures. In this regard the English Indices of Deprivation (IoD) has been widely criticised for measuring deprivation in urban areas better than in rural areas. Critics of the IoD note that:
- Some measures it uses are urban-oriented, whilst rural aspects to issues such as low income, health and crime are under-reported or poorly measured;
- Access to services and affordable housing (key rural issues) is one domain, but is given less weight than most of the other domains;
- The Index is most effective at identifying small area concentrations of deprivation, whereas rural deprivation is typically scattered.

The weighting of deprivation within the Foundation Formula is too high. In the 2018 consultation paper, analysis produced by MHCLG showed that the weighting for deprivation should not be higher than 4% for upper-tier services, and 0.4% for lower tier services. It is clear that the weighting in the proposed Foundation Formula is considerably higher than this. It is essential that any weighting is driven by the evidence. Does MHCLG have any evidence or analysis that justified the higher weighting? If so, why is it so different from the analysis that was presented by the department in 2018?

43 Do you agree with/have any comments on the design of the Fire and Rescue Formula?

Not Answered

Please provide any additional information, including any explanation or evidence for your response. :

RSN is disappointed that the fire and rescue formula has not been updated. A new formula has been under consideration for a significant period of time and should have been updated. The current formula is hugely skewed towards urban areas, and particularly London. Funding for fire services in rural areas results in much lower levels of permanent staffing (compared to urban areas), and much longer call-out times. Several rural fire and rescue authorities lost RSDG in 2025/26. RSN would support the development of a new relative needs formula based on multi-level regression modelling.

44 Do you agree with/have any comments on the design of the formula for Highways Maintenance?

Agree

Please provide any additional information, including any explanation or evidence for your response. :

The simplification of the Highways Maintenance RNF is a move in the right direction. It makes sense to largely base the formula on highways lengths and traffic flow. The x2 weighting for urban roads in the current formula could not be justified, and, if there are higher costs related to urban roads, these are picked up in the traffic flow adjustment. Some of our members will oppose the winter maintenance changes but they broadly work for rural authorities. There are some odd changes for some rural authorities which MHCLG should explain.
Northumberland County Council says that it has key gritting routes across the County covering 33% of the road network. Of the 28 routes 19 cover the rural road network. In the winter season of 2024/25 a total of 206,812 miles of road has been treated across Northumberland's road network. Rural routes alone in Northumberland are gritted at a higher frequency than urban areas. Of the 206,812 miles treated 134,889 have been in rural Northumberland. Further to this Northumberland's rural high ground roads are gritted on average 35% more frequently than the urban routes. There are an additional 12,630 miles treated on the rural High ground road network alone. These high ground routes equate to an approximate additional cost of £61,714 across this current winter period in 2024-2025. (mileage used is the total distance travelled during multiple treatments across the season)

45 Do you agree with/have any comments on the design of the formula for Home-to-School-Transport?

Agree

Please provide any additional information, including any explanation or evidence for your response.:

RSN welcomes the introduction of the Home-to-School Transport (HTST) RNF, but it is not clear why the travel distances have been capped at 20 miles. For many of our larger authorities with very sparse populations, there might be no alternative but to transport a child to a school that is more than 20 miles away. We would like to see the number of journeys that are excluded on this basis, and to impact on funding if they were to be included. For the SEND element, the consultation paper suggests that this affects less than 5% of pupils – but we would except that these are largely in rural areas.
Our colleagues at Northumberland County Council have given us some useful context they state:
"Currently just over £26 million is spent annually providing school/college transport for approximately 8200 qualifying children and young people to enable them to access education at their nearest learning provider. The costs of provision have escalated since the pandemic. SEND transport is provided for just 1526 pupils and costs £13.5M which is in excess of the costs of providing school transport for the 6674 students attending mainstream provision (£12.9M). This, in part, reflects the longer distances that many SEND students need to travel to access specialist provision. The average cost of transport for a SEND student is nearly £8900 per year whilst the average cost of transport for a mainstream school child is just over £1900, i.e. 7K less a year.
Changes in market conditions have occurred since the pandemic which has led to a sharp increase in costs. Many elderly drivers took the opportunity to retire during the pandemic creating a labour market shortage, particularly in the more rural parts of the county. Societal changes that began during lockdown such as the increase in homeworking and the consequential rise in the popularity of home deliveries has created other job opportunities for drivers. This has led to driver shortages and whilst not as acute as it was in the immediate aftermath of the pandemic there is plenty of anecdotal evidence that taxi operators are employing the services of drivers who are based a significant distance from the home to school transport routes that cover the more remote areas of the county. As a result, high levels of "dead mileage" are being incorporated into contract prices. Whilst there are other job opportunities for drivers within the sector as a whole there has been a corresponding fall off in private hire work such as tour bookings which has resulted in coach operators located in the rural parts of the county to cease trading, e.g. Travelsure. This in turn has led to reduced competition when tenders for council contracts have been undertaken resulting in higher prices.

Whereas in an urban setting families will live within a comfortable walking distance of their local school that is very often not the case in rural areas of the county. Local authorities have a statutory duty to provide school transport for children and young people who live beyond the statutory walking distance from their local school, (over 2 miles for a child up to 8 years of age and 3 miles for a child aged 8 or over). In addition, school transport must also be provided where a child may live within statutory walking distance of school but the walking route to school is "unavailable" due to, for example, the absence of a footpath or an opportunity to safely cross a busy road. In addition, statutory guidance also prescribes maximum journey times (90 minutes per day for pupils of primary school age & 75 minutes a day for students of secondary school age) which results in additional home to school transport routes being put in place to ensure journey times for children are not too long. For such reasons, school transport is provided mainly in rural areas and hence the greater costs of provision.
The same cost drivers exist when students enter Post 16 studies, in fact the costs of travel increase when students living in rural areas access vocational courses at further education colleges given the need to travel to either Ashington for Northumberland College or to Newcastle College given the lack of opportunities to undertake vocational study at high school sixth forms".
East Riding have provided the following feedback. They very much welcome the introduction of a funding formula to recognise the specific costs of providing home to school transport, however, they fundamentally disagree with the inclusion of a spurious 20 mile cap which clearly disadvantages large rural authorities such as ours.
East Riding of Yorkshire Council is a unitary authority, covering approximately 930 square miles, making it one of the largest unitary authorities in the country. The East Riding is a predominantly rural area with over half the population living in dispersed rural communities. Given the very nature of this, and the fact that they have only 17% of Children and Young People (CYP) with significant SEND needs via an Education Health and Care Plan (EHCP) in special schools locally (below a national comparator of over 30%), they have many CYP of greatest need travelling greater distances in order to get to their nearest suitable school. For many CYP with EHCPs, their nearest suitable provision can often be of distances exceeding 20 miles, and often beyond the borders of the East Riding. To help put this into perspective, they have a large number of CYP who live in the north of the county (Driffield/Bridlington and outlining villages that are among the most rural in England) that need to travel into the Hull area to access their nearest provision, which is a journey ranging between 23 miles -28 miles. Similarly, to the west of the county (Goole area), we equally have a large number of CYP travelling into the Hull area, which is at least 30 miles.
Whilst it may not be commonplace for a number of local authorities to generally exceed 20 miles, this is not uncommon within our large local authority and to omit these would not give a true reflection of the reality of the situation. If an outlier adjustment is needed we would propose a much greater magnitude, for example 50 miles. Whilst there is an expectation that CYP should, where possible, be placed in schools close to their home, this is not always possible due to many factors such as sufficiency and lack of specialist school places, the lowest level of high needs funding per pupil in England for East Riding CYP, managing parental expectations, Tribunal outcomes heavily weighted in favour of parental preferences, and many CYP now presenting with a complex profile of need, with many providers returning a negative consult reply, which results in a need to extend the search further afield.
It is therefore strongly felt that the design of the funding formula with a 20 mile cap will have a significantly detrimental impact on East Riding of Yorkshire Council as this will exclude a higher proportion of CYP than anticipated, resulting in a lack of funding for arguably the most costly transport routes.

Chapter 13: Equalities impacts

46 Do you have any views on the potential impacts of the proposals in this consultation on persons who share a protected characteristic?

Please provide any additional information, including any explanation or evidence for your response.:

No RSN response.