



Ministry of Housing,
Communities &
Local Government

**Ministry of Housing, Communities & Local
Government**
2 Marsham Street
London
SW1P 4DF

Nick Golding
request-1216995-
1ff677a1@whatdotheyknow.com

20 January 2025

Dear Nick Golding,

Freedom of Information Act 2000 – FOI2024/32032

Thank you for your request for information which was received on 17 December 2024 and considered under the Freedom of Information Act 2000.

You requested:

'I would like to request under the Freedom of Information Act 2000 any documents relating to the Ministry of Housing, Communities and Local Government's analysis of why the minimum 500,000 population size recommended for new unitary councils in the English Devolution White Paper is appropriate and how this population threshold was calculated'.

In line with our duty to provide advice and assistance under section 16 of the FOI Act, we can confirm that the relevant documents are the PWC report, which we quote in the English devolution White Paper available publicly at [PwC-Evaluating-the-importance-of-scale-in-proposals-for-local-government-reorganisation.pdf](#) and the English Devolution White Paper [English Devolution White Paper - GOV.UK](#) at section 4.2.3. with the case for section quoting the PWC report.

We can confirm that this information is also held in another document, but we are withholding that as explained below.

This information is exempt from disclosure under Section 35(1)(a) of the Freedom of Information Act 2000 (FOIA) as it relates to the development of government policy.

Information falling within this exemption must still be provided, however, unless it is not in the public interest to do so.

There is always a degree of benefit in making information held by public authorities available, as it increases public participation in decision making and aids the transparency and accountability of government. The Department recognises that this public interest allows for the scrutiny of Government policy and decision-making processes, in particular with regards to increasing public understanding of this subject.

However, the Department must also consider the public interest which lies in maintaining a "safe space" in which policy officials and Ministers are able to develop policy, ideas and reach decisions away from external interference and distraction. The information you have

requested relates to a live policy and disclosure of this information would unacceptably erode the aforementioned "safe space" and is liable to cause a "chilling effect".

Officials and ministers must feel able to consider the information and advice before them and be able to reach objective, fully informed decisions without impediment and free from distraction that such information will prematurely be made public.

We have therefore decided that, on balance, it is not in the public interest to disclose the information in this document at this time.

Yours sincerely,

MHCLG FOIA Team

Complaints procedure

If you are unhappy with this response, we will review it and report back to you. (This is called an internal review.) If you want us to do this, let us know by return email within 40 working days of receiving this response. You can also ask by letter addressed to:

Ministry of Housing, Communities & Local Government
Knowledge and Information Access Team
4th Floor, Fry Building
2 Marsham Street
London, SW1P 4DF

If you are still not content with the outcome of the review, you may apply to refer the matter to the Information Commissioner for a decision. Generally, the ICO cannot make a decision unless you have exhausted the review procedure provided by the Department.

The Information Commissioner can be contacted at email address casework@ico.org.uk or use their online form at ico.org.uk/concerns or call them on 0303 123 1113.