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| To: | | | City Executive Board |
| Date: | | | 13 March 2019 |
| Report of: | | | Head of Housing Services |
| Title of Report: | | | Allocation of Homelessness Prevention Funds for 2019/20 |
| Summary and recommendations | | | |
| Purpose of report: | | | To approve the allocation of homelessness prevention funds with the purpose of helping meet the objectives of the Housing and Homelessness Strategy 2018/21. |
| Key decision: | | | Yes |
| Executive Board Member: | | | Cllr Linda Smith, Deputy Leader (Statutory) of the Council, and Board Member for Leisure and Housing |
| Corporate Priority: | | | Meeting housing needs |
| Policy Framework: | | | Housing and homelessness strategy 2018/21 |
| Recommendations: That the City Executive Board resolves to: | | | |
| 1. | Approve the allocation of Homelessness Prevention funds to commission homelessness services in 2019/20 as outlined in paragraph 56 to 58 below and in Appendix D, including the following changes to allocations   * Big Issue Service Broker – that this Payment by Results contract is ended and a contingency of £3,125 is made available to facilitate this * OxTHINK – allocation increased from £4,396 in 2018/19 to £5,272 to cover costs relating to the continuation of licence agreements for service providers’ staff and further system development. This allocation to be reviewed in year to take account of alternative ICT solutions, including the new housing database. * Emmaus – that funding is reduced from £10,000 in 2018/19 to £5,000 and will taper to zero in 2020/21 in recognition of the fact that Emmaus’ second-hand furniture superstore is expected to be financially self-sustaining in 2020/21 and will continue to provide work opportunities * Network development - £5,000 towards the development and delivery of a programme of networking, learning and development for commissioned service providers’ staff and others as appropriate * Access to leisure services - £5,000 to support former rough sleepers to access the Council’s leisure facilities free of charge. * Contingency for Rough Sleeping and Single Homelessness - £1,587 allocated for in-year changes to committed allocations. | | |
| 2. | Approve that the Council enter into 24 month [1st April 2019 to 31st March 2021] grant agreements with the Response Organisation and Homeless Oxfordshire to deliver a combined Acacia / Housing First Service, with increased capacity to meet the needs of chronic and entrenched rough sleepers. | | |
| 3. | Delegate to the Head of Housing in consultation with the portfolio holder for Housing the discretion to revise the intended programme within the overall budget if required. | | |
| Appendices | | | |
| Appendix A | | Appendix A – Supported Accommodation for City Use 2018/19 and 2019/20 | |
| Appendix B | | Strategic priorities for meeting the needs of vulnerable people and rough sleepers [Extract from the Council’s Housing & Homelessness Strategy 2018-21] | |
| Appendix C | | Commitments and year end forecast 2018/19 | |
| Appendix D | | Proposed allocations 2019/20 | |
| Appendix E | | Map of services funded by Oxford City Council for rough sleepers and single homeless people | |
| Appendix F | | Risk assessment | |

# Introduction and background

1. This report presents an overview of how the funding allocated in 2018/19 has been spent and the funding available in 2019/20 to provide services for rough sleepers and single homeless people in Oxford.
2. The report also provides an update on developments in 2018/19 including the number of people known to be sleeping rough and new funding opportunities emerging from the government’s new rough sleeping strategy which aims to support every person who sleeps rough to get off the streets and into a home by 2027.
3. Finally, the report highlights some of the opportunities and challenges that lie ahead.

# Context and key developments 2018/19

# Number of people sleeping rough remains high

1. Rough sleeping continues to be a significant issue in the City, with high numbers of rough sleepers being contacted by Oxford Street Population Outreach Team (OxSPOT) each month – 105 people were seen rough sleeping in October 2018, 115 in November and 67 in December.
2. The Council’s official street count in November 2018 was 45, a decrease from the total of 61 recorded in November 2017. In the period April to December 2018, there were 319 positive interventions with individual rough sleepers, to assist them off the streets. This compares favourably with performance in 2017/18 when there were 304 positive interventions in total.
3. The Council also carries out an estimate of the number of people sleeping rough in the City. Oxford’s most recent estimate – also carried out November 2018 - showed a small increase from 89 (2017) to 94 individuals. Estimates tend to give a higher figure than street counts because they draw upon a wider range of data sources. These include information from the rough sleeping outreach team (OxSPOT), service providers and teams within the Council.
4. The Council provides an estimate in addition to street count data in order to make comparisons with the other Oxfordshire districts, which only undertake estimates rather than street counts. This is due to the mostly rural nature of the districts.
5. The difference between the street count and estimate figures reflects the different methodologies used. For example, whilst the street count is necessarily limited by the number of people that are counted within the 4 hour period of the count, the intelligence-based estimate is based on the knowledge of multiple agencies which engage with many more individuals than can be counted within this time.
6. Across the county, the number of individuals identified by District Council estimates were broadly in line with figures for the previous year – Cherwell 9 (2017) to 11 (2018), South Oxfordshire 2 (2017) to 3 (2018), Vale of White Horse 10 (2017) to 9 (2018) – with the exception of West Oxfordshire which saw a reduction from 7 (2017) to 2 (2018).
7. Both Oxford City’s street count and estimate continue to show that a significant proportion of people sleeping rough in Oxford do not have a local connection to the City (up to 30%, 2018 Estimate) and also that the connection status of several individuals is unknown (22%, 2018 Estimate).[[1]](#footnote-1)
8. Similarly, 13% of those identified at the November 2018 street count had a connection to Oxford, whilst 15% were connected to one of the other Oxfordshire District Council areas[[2]](#footnote-2). Table 1 below summarises the findings of the November 2018 street count and estimate with regard to local connection status[[3]](#footnote-3).



1. As a result of the latest estimates, it is clear that the Oxfordshire Health and Wellbeing Board’s target to “ensure that the number of people estimated to be sleeping rough in Oxfordshire does not exceed the baseline figure from 2016/17 (79)” has not been met in 2018/19.
2. This underlines the need for continued collaboration and cooperative working between all the key strategic partners to ensure an effective response to meeting the needs of single homeless people across the whole county, and not simply in Oxford.

# Impact of changes to funding for housing related support services

1. Oxfordshire County Council previously funded all supported accommodation for single homeless people and rough sleepers across the County through its’ Housing Related Support budget. A total of 285 units of supported accommodation were provided across the County, with 252 of these based in the City but including provision for people from the Districts.
2. As a result of substantial reductions to its overall funding, the County Council declared its’ intention in 2015 to reduce its’ budget for Housing Related Support (previously £1.5m per annum) by 100%. Subsequently, the County Council agreed to maintain its’ budget at £500,000 per annum to 2018/19.
3. To mitigate the impact of this reduction in funding and maintain the supply of supported accommodation for single homeless people, Oxford City Council, together with the Oxfordshire District Councils, Oxfordshire County Council and Oxfordshire Clinical Commissioning Group agreed to contribute to a pooled budget and enter into joint commissioning arrangements for a period of three years [2017/18 to 2019/20].
4. 2019/20 will be the third and final year of the current pooled budget arrangements for the countywide Adult Homeless Pathway. This successful collaboration has served to maintain a supply of jointly commissioned bed spaces as part of the Adult Homeless Pathway, albeit at a reduced level. This has been also complemented by the City and District Councils’ commissioning of their own supply of supported accommodation.
5. Currently, there are a total of 108 jointly commissioned beds all of which are located in Oxford (79 of these are reserved for City use only).
6. As detailed at Appendix A, the City Council will directly commission in addition to this allocation a total of 140 further bed spaces in 2019/20. Together, the Oxfordshire District Councils directly commissioned in 2018/19 a further 55 bed spaces for people with a connection to their locality of which 10 are in Oxford and the remainder are in other locations across the county.
7. Discussions are underway with the Joint Commissioning Group partners about continuing the pooled budget arrangements. Oxford City Council is committed to continuing this arrangement and this has now been agreed in principle with the other partners. The City’s annual contribution towards the continuation of these arrangements in 2020/21 and 2021/22 is expected to be £219,700 [current contribution of £161,700 plus additional contribution of £58,000].
8. Currently, the City Council’s annual contribution to the pooled budget is £161,700. In years one and two of the arrangement [2017/18 and 2018/19] additional funding of £323,400 was drawn from reserves to cover the cost of the contribution. In 2019/20 and subsequent years, it is expected that this cost will be covered from homelessness prevention fund core budget of £1,583,447 [see paragraph 46 below].

Ensuring sufficient provision to meet Oxford City’s needs

1. In order to compensate for the reduction in capacity, Oxford City Council has increased the number of beds that it commissions directly. In addition to the 79 beds commissioned via the pooled budget exclusively for City use, the City Council has commissioned in 2018/19 a further 132 bed spaces, including 20 sit up spaces.
2. This provision includes the commissioning of 22 beds for people with complex needs at Simon House, which the City Council took over in 2018/19 following the County Council’s de-commissioning of this 52 bed hostel. In September 2017 CEB agreed to allocate funding for 5 years from 2019/20 for the delivery of a new facility for rough sleepers and single homeless people at Rymers Lane in Cowley.
3. The new facility is expected to open Quarter 2 2019/20 and will comprise 22 units of accommodation for people with complex needs and 15 units of move on accommodation. Simon House will remain open during the first Quarter of 2019/20 and a plan to manage the transition of the service and residents to the new facility is in place.
4. This level of commissioning for the city has been made possible by the City Council’s allocation of additional funding for services and support for rough sleepers and single homeless people in 2018/19 (£100,000) and from 2019/20 onwards, through the inclusion of a further £200,000 in the core budget for rough sleeping and single homelessness.
5. It has also been made possible as a result of the Council’s successful bid in 2018 to the Ministry of Housing, Communities and Local Government’s [MHCLG] Rough Sleeping Initiative (RSI), which yielded just over £1,000,000 towards the delivery of new services and pilot initiatives in 2018/19 and 2019/20.
6. These have included in 2018/19 the development of a multi-agency service hub, two winter shelters, new services piloting dedicated services for women and people with drug and alcohol addictions, and a significant expansion of outreach service capacity (OxSPOT).
7. Officers are awaiting confirmation from MHCLG regarding the RSI allocation for 2019/20, however the table attached at Appendix A summarises the accommodation provided in 2018/19 and what is expected to be available in 2019/20.

# Further funding opportunities

1. In August 2018, the government published a new strategy for rough sleeping which sets out the government’s vision for halving rough sleeping by 2022 and ending it by 2027. This was followed in December 2018 with the publication of an action plan which confirms the government’s intention to provide funding to help deliver its strategy.
2. The funding opportunities published so far, including the Rapid Rehousing Pathway and Private Rented Sector Access Funds, offer the potential to do more and develop new approaches to service delivery. However, they offer relatively short term funding and are competitive in nature.
3. Despite this, in November 2018, officers submitted a major bid to the MHCLG’s Rapid Rehousing Pathway (RRP) Fund, which offered revenue funding during 2019/20 for a range of initiatives including

* Somewhere Safe to Stay (SStS) – assessment and short term accommodation hubs based on the No Second / No First Night Out service model
* Navigators – to provide joined-up support for individuals, particularly chronic and entrenched rough sleepers, throughout their journey from the street to long term, sustainable accommodation options
* Local Lettings Agencies – to help clients to access accommodation in the Private Rented Sector (PRS)
* Supported Lettings – provision of floating support for tenancy sustainment

1. We have received confirmation in February 2019 that our bid to be an “Early Adopter” for ‘Navigators’ has been successful. Our bid for the three other elements was not accepted in this first round, and in the case of Somewhere Safe to Stay we understand that this was due to our not being able to provide the service immediately, e.g. in the quarter following bid submission. However, we have had positive feedback on the bid and officers are hopeful that we will be successful in the second round which is expected in the final quarter of 2018/19.
2. The process of assembling this bid – and a parallel bid to the Private Rented Sector (PRS) Access Fund which is offering revenue funding to March 2020 for schemes designed to increase access to or sustain tenancies within the PRS for single people who are or at risk of becoming homeless – has however enabled officers to develop a proposal that aims to:

* Increase the scope and effectiveness of ‘front-end’ engagement and assessment services
* Provide extra emergency accommodation open to all rough sleepers (including those with No Local Connection (NLC) and No Recourse to Public Funds (NRPF)) every night throughout the winter
* Develop the range and effectiveness of sustainable Move On routes and options for individuals that are eligible for pathway accommodation and those that are not
* Consolidate and improve the efficiency of accommodation and other services, including for those with no local connection and / or recourse to public funds, and vulnerable groups including women

1. The centrepiece of this proposal is the Somewhere Safe to Stay in Oxford provision. A Council-owned building at Floyd’s Row in the city centre, has been identified as an option for this provision. However, substantial capital investment is needed to refurbish the building and officers are concerned that the current lack of a capital element in the RRP Fund may prove to be a barrier to award.
2. With this in mind, but also in light of the City Executive Board’s aspiration to deliver from winter 2019/20 winter emergency accommodation that is open every night to all rough sleepers, the Council has included within its budget for 2019/20 a total one-off sum of £337,000 (comprising £184,000 capital and £153,000 revenue). This will be used to fund the initial development works at Floyds Row and deliver this winter emergency accommodation, which is currently not eligible for any of the available MHCLG funding streams.

**Use of Homelessness Prevention Funds in 2018/19**

1. Last year’s report by the Head of Housing Services on the allocation of homelessness prevention funds indicated that a total of £1,834,853 had been allocated for the delivery of services and support for rough sleepers and single homeless people in 2018/19.
2. This sum was later adjusted in order to mitigate budget pressures elsewhere in the Housing Needs service. This meant that the forecast carry forward of £142,906 into 2018/19 did not happen. However, as indicated in last year’s report, members approved further additional transfers to the Homelessness Reserve. As a result, a sum of £98,000 is available to be drawn down in 2019/20.
3. Similarly, funding from reserves allocated for the expansion of the Acacia Service in 2018/19 has not in fact been drawn down. This has been due to the need to find a new way forward for the Acacia and Housing First Services which both increases capacity, ensures that there is essential mental health input to the service, facilitates stronger partnership working between providers and allows for future expansion should further funding become available.
4. Instead, a new combined Acacia / Housing First Service will be commissioned to deliver 15 units of accommodation from 1st April 2019 and the unspent allocation from reserves for this purpose is included in the budget for 2019/20 (£59,750). The service will play an important role in supporting the most entrenched and chronic rough sleepers to move off the streets.
5. Members are asked to approve the recommendation that the Council enter into 24 month [1st April 2019 to 31st March 2021] grant agreements with the Response Organisation and Homeless Oxfordshire to deliver the combined Acacia / Housing First Service. The allocation of £59,750 from reserves in 2019/20 mitigates the total cost of the service over this period making it sustainable within the core budget allocation for 2019/20 and 2020/21.
6. The Council has also submitted a bid to the Ministry of Housing, Communities and Local Government’s Cold Weather Fund, which offers funding towards the cost of providing additional winter services. Funding allocations are based on the number of people sleeping rough in the locality (2017 figures) and on this basis and following discussions with MHCLG, we have made the assumption that a total of £35,000 can be secured in 2018/19.
7. This will off-set the forecast overspend in relation to SWEP where officers have forecast spending to be up to £50,000 against the original allocation of £30,000. This is the result of needing to increase safety and security arrangements for SWEP to ensure that all those that need to access the service are able to do so whilst ensuring the safety of others. It also reflects the increased use of discretion to open SWEP winter 2018/19 outside of the standard protocol. Due to the unpredictability of SWEP operation it is not possible to give a precise figure for the expected over-spend until year end.
8. Finally, the sum of £11,959 has been drawn down in year from the Homelessness Reserve to ease the pressure created because the intended carry forward from 2017/18 did not happen [see paragraph 37 above] and to off-set two other areas of over spend. These are against OxThink (£2,497) where additional spending was needed to ensure the Council’s data system is fit for purpose following the significant expansion of accommodation based services and a commitment to Aspire (£5,000) for the development of a service hub.
9. Taking account of these adjustments, a total of £1,695,106 was available for and allocated to the delivery of services and support for rough sleepers and single homeless people in 2018/19. This sum does not include RSI funding or the additional funding allocated by the Council to support the development of the City Conversation, a citywide partnership to tackle issues relating to rough sleeping and single homelessness.

**City Conversation on Rough Sleeping - spending 2018/19**

1. The rapid and very visible increase in the number of people sleeping rough on the City’s street continues to generate widespread public concern – about the issue itself and what is being done about it. As part of its response, the Council has initiated a citywide conversation on rough sleeping to explore the causes and possible solutions to the problem.
2. In February 2018, the Council allocated a total of £150,000 to be drawn from the Council’s reserves towards the development of a Rough Sleeping Charter for Oxford and citywide partnership and to fund additional staffing capacity within the Rough Sleeping and Single Homeless Team to co-ordinate and support the Council’s engagement with the developing Charter and partnership, during 2018/19 and 2019/20. The forecast spend against this allocation is a total of £93,000 to 31st March 2019.
3. The main work of the Partnership is being taken forward by four working groups accountable to a Steering Group. They are delivering a Charter, a brand and website, improving information about rough sleeping and coordination of efforts to address rough sleeping as well as a fund raising programme including alternative giving. Alternative giving will build upon the recent successful Christmas Match Fund appeal which the Rough Sleeping and Single Homelessness Team helped to deliver and which raised a total of £86,000 for nine local homelessness charities.

**Allocation of Homelessness Prevention Funds 2019/20**

Strategic framework for commissioning and funding 2019/20

1. The Council’s priorities in terms of tackling rough sleeping and single homelessness are set out in Priority 2 [Prevent homelessness and meet the needs of vulnerable people and rough sleepers] of its Housing and Homelessness Strategy 2018-2021 summarised at Appendix B – Strategic Priorities for preventing homelessness and meeting the needs of vulnerable people and rough sleepers. Consideration is also given to the national rough sleeping strategy published 2018.

# Funding 2019/20

1. On 13th February the Council agreed its budget and Medium Term Financial Plan for the period 2019-20 to 2022-23 which included a base budget of provision of £1,141,168 per annum. A further commissioning budget is also available from the Council’s own grant budget of £442,279.
2. It is also assumed that the City Council will continue to receive a total contribution from the Oxfordshire District Councils towards SWEP provision of £3,000.
3. Finally, a total of £59,750 [unspent reserves] towards the delivery of additional Housing First / Acacia units in 2019/20 and 2020/21 [see Paragraphs 29 to 31 above] is included in the budget along with the £93,000 added to the homelessness reserve in 2018/19 and a further £5,000 from this reserve to cover the continued contribution to Emmaus. This brings the total funding available in 2019/20 to £1,744,197. This total does not include additional funding from the Rough Sleeping Initiative or any future successful funding bids.
4. Reflecting the cross-commissioning agenda and cross-strategy advantages of homeless prevention and ending rough sleeping work, a multi-agency steering group is responsible for advising on the monitoring of this pooled budget. The group comprises of representatives from Oxford City Council, Oxfordshire County Council Joint Commissioning Team, Public Health and the Oxfordshire Clinical Commissioning Group.

# Expected developments in 2019/20

1. As discussed in Paragraphs 20 to 26 above, officers hope to secure additional external funding towards the development of services in 2019/20 and beyond. If secured, these funds will be used to develop the proposed services outlined at Paragraph 22. This will in turn require significant transformation of services with possible financial implications in order to re-shape existing provision to release funding for and ensure alignment with the new service structure.
2. It is already clear that certain enablers are required to optimise the success of the proposed services. These include:

* The need for a countywide strategy and collaborative working with Housing Related Support (HRS) Joint Management Group partners[[4]](#footnote-4) to end rough sleeping, including a commitment to develop more locality-based services for people with a connection to the Oxfordshire District Council areas
* Medium term (3-5 year) strategy, action and financial plan that reflect the true cost of delivering services for some of the most vulnerable people in our society, are needed to deliver a strategic approach that garners the support and motivation of key stakeholders including supported accommodation and other service providers
* In line with the above, a move away from an annual commissioning cycle towards longer term commissioning and procurement of services which test the market where appropriate and afford greater certainty to both providers and the Council as commissioner
* Tailored and resourced approach to meeting the needs of specific groups including people with drug and alcohol addictions, women, people with disabilities, older people, LGBT people, and people with no local connection or recourse to public funds.

1. More work is needed to develop and refine the approach and costings for the proposed development of Floyds Row and related services. Officers will update the Portfolio Holder on progress towards this and will bring a further, more detailed report on this matter, including the proposed timescales for changes to current commissioning arrangements to City Executive Board in the summer.

# Proposed allocations 2019/20

1. With this in mind, the proposed allocations for 2019/20 are shown at Appendix D.
2. In summary, it is proposed that spending across all service areas including supported accommodation, street engagement, services to prevent and relieve homelessness and for positive activities and to help people get into work and training, is maintained at the same level as in 2018/19.
3. It is recommended that the following changes are made to previous allocations:

* Big Issue Service Broker – that this Payment by Results contract is ended and a contingency of £3,125 is made available to facilitate this
* OxTHINK – allocation increased from £4,396 in 2018/19 to £5,272 to cover costs relating to the continuation of licence agreements for service providers’ staff and further system development. This allocation to be reviewed in year to take account of alternative ICT solutions, including the new housing database.
* Emmaus – that funding is reduced from £10,000 in 2018/19 to £5,000 and will taper to zero in 2020/21 in recognition of the fact that Emmaus’ second-hand furniture superstore is expected to be financially self-sustaining in 2020/21 and will continue to provide work opportunities
* Network development - £5,000 towards the development and delivery of a programme of networking, learning and development for commissioned service providers’ staff and others as appropriate
* Access to leisure services - £5,000 to support former rough sleepers to access the Council’s leisure facilities free of charge.
* Contingency for Rough Sleeping and Single Homelessness - £1,587 allocated for in-year changes to committed allocations.

1. A diagram outlining the Adult Homeless Pathway and other services funded by the Council for the benefit of rough sleepers and single homeless people is provided at Appendix E.
2. It is recommended that the Head of Housing has the delegated authority, in consultation with the Portfolio holder, to administer any necessary changes to these allocations.

**Financial implications**

1. The budgeted spend on homelessness prevention for 2019/20 is estimated at £1,744,197 funded as follows :

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| **Item** | **£’s** | **Notes** |
| Homelessness base budget | 941,168 |  |
| Voluntary sector grants budget | 442,279 |  |
| Additional funding from OCC base budget | 200,000 |  |
| Acacia Housing First Project | 59,750 | Raised from reserves 2016/17 towards delivery of Acacia Service |
| From homelessness reserves | 98,000 | £93,000 added to the reserve 19th February 2018 plus additional £5,000 to cover cost of continued contribution to Emmaus |
| SWEP provision | 3,000 | Contribution from District Councils |
|  |  |  |
| **Total** | **£1,744,197** |  |

# Performance monitoring

1. In distributing this budget, the Council will ensure that there are clear outcomes and targets in each organisation’s service specification which are reported on quarterly.
2. Officers will schedule quarterly, 6-monthly or annual performance monitoring meetings with all services to ensure that outcomes and targets are achieved and issues are addressed in a timely and professional manner.
3. The Rough Sleeping and Single Homelessness Team will also prepare an executive summary of the collated performance data which will be shared with the Preventing Homelessness Group and Portfolio Holder on a quarterly basis.

# Legal issues

1. All services funded from Homelessness Prevention Funds have Service Level Agreements in place. The SLAs covers obligations for services as well as consequences for not fulfilling these obligations.

# Level of risk

1. The Risk Register is attached as Appendix F.

# Equalities impact

1. All services in receipt of funding are subject to rigorous monitoring which includes equality and diversity.

# Conclusion

1. The proposed funding allocation for 2019/20 will ensure that the Council continues to provide an increasingly broad range of services for rough sleepers and single homeless people and rough sleepers to prevent and tackle rough sleeping, and support individuals to live and sustain independent lives.
2. Thorough review and evaluation of all services funded in 2019/20 will be carried out in year to inform future funding decisions.

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| Background Papers: | |
| 1 | None |

1. Individuals identified by the count are categorised as ‘unknown’ either because - they have been recently referred to Oxford SPOT [Street Population Outreach Team] and little is known about them; the person is not actively engaging with the making information gathering difficult; the person has been seen only a few times and it has not been possible to investigate and obtain information. [↑](#footnote-ref-1)
2. Of those identified as having a connection to one of the Oxfordshire District Council areas 9% (4) had a local connection to Cherwell (15% (9) in 2017), 2% (1) had a local connection to South Oxfordshire  (2% (1) in 2017), 2% (1) had a local connection to Vale of the White Horse (3% (2) in 2017) and 2% (1) had a local connection to West Oxfordshire (2% (1) in 2017) [↑](#footnote-ref-2)
3. For breakdown of local connection to the Oxfordshire Districts please see above. Please note that due to rounding percentages may not total to 100%. [↑](#footnote-ref-3)
4. Oxford City Council, Oxfordshire County Council, Oxfordshire Clinical Commissioning Group, Cherwell District Council, South Oxfordshire District Council, Vale of White Horse District Council, West Oxfordshire District Council [↑](#footnote-ref-4)