

I am writing in response to the Applicant's Deadline 7 submission REP7-063 , "8.163 Applicant's response to Deadline 6 submissions", which in turn is a response to Mr Mills-Baker's representation 6-151.

Mr Mills-Baker said:

Para 8.7 Deadline 7 Submission repeats WR Rep 6-151

2.2.8 and 4.1.6 refer to £22bn of free cash flow, for a 50-year period to 2072. Not only does it include concession income that belongs to the airport operator until at least 2032, it is an inflation adjusted figure and double the amount calculated at current prices. This gives a false impression that there is more than ample free cash flow to service and repay debt, as well as offer an appropriate return to both the investors and LBC. This is because, whilst the asset life may stretch to 50 years, borrowing terms and returns to investors are unlikely to extend beyond 25 years.

Luton Rising Response

The Applicant does not accept the points made:

- *The concession fee income does not belong to the airport operator. As explained in Question 8.5 above, the identified Paragraphs and Table 5 in the Funding Statement [REP5-009] include the total net surplus cash flow that is available for financing the scheme, paying tax and concession fees.*
- *All cash flow based financial models work in nominal (inflation adjusted) terms as all income is in nominal terms and all costs are in nominal terms, including interest payments on actual monies borrowed and tax payments.*
- *With a 40-year (or longer) Phase 2 concession, and lenders offering 25-years terms an appropriate debt / equity financing solution can be found to satisfy lender requirements. Further, debt longer than 25-years is available in the markets, and refinancings during a concession are also common.*

My representation

This last paragraph indicates that the applicant and its parent entity Luton Borough Council consider using debt funding a realistic means of covering some or all of the total project cost of at least \$2.7 billion.

According to the unaudited Luton Borough Council 2022-23 accounts total debt (borrowing plus creditors) at 31 March 2023 was £1,029 million gross, or £867 million net of short term debtors. This equates to £4577 gross or £3856 net per inhabitant.

On 17 January this year, the BBC Shared Data Unit published a listing of some 380 local authorities showing their overall debt both in total and per capita. This table is available at their website to download, sort and filter. In it, Luton Borough Council's debt is shown as a lower figure of £712 million, but even at that level it ranks 20th out of 380 authorities for indebtedness per capita. It would rank 13th using the net debt figure from the accounts.

If any or all of the estimated cost of this DCO were to be funded by debt, because of consolidation the additional debt would be shown in full on Luton Borough Council's balance sheet. As my spreadsheet shows, based on the BBC's lower figures, the per capita debt would rise as follows, making Luton one of a handful of the most severely indebted Local Authorities in the UK.:

% project cost as debt	Per capita debt £	Ranking out of 380 LAs
25%	6170	6
50%	9173	3
75%	12175	2*
100%	15177	2*

- Behind only Woking which is subject to an S114 notice.

I contend that this indicates that it is not a viable option to use debt to fund more than a very small proportion of the project cost.

Luton Borough Council total debt as at 31.3.2023

Source: Luton Borough Council unaudited accounts 2022-23 pages 44-45

All figures in £000

Short term borrowing	43,691
Short term creditors	174,937
Long term creditors	92,734
Long term borrowing	717,931
Total short term	218,628
Total long term	810,665
Total borrowing	761,622
Total creditors	267,671
Total debt	1,029,293
less short term debtors if recoverable	162,269
Net debt	867,024

Percent of project cost funded by debt

Local author Type	Nation	Population	Total amassed debt	Debt per person 2023-24 Q2 (£)	25%	50%	75%	100%	Using council own numbers
Medway	Unitary Autho	279,827	#N/A	#N/A					
Woking	Non-metropol	103,889	1,948,583,000	18,756					
Spelthorne	Non-metropol	102,995	1,072,698,000	10,415					
Warrington	Unitary Autho	211,227	1,739,678,000	8,236					
Thurrock	Unitary Autho	175,902	1,415,889,000	8,049					
Runnymede	Non-metropol	87,739	637,900,000	7,270					
Comhairle nan Council Area	SCO	26,640	129,070,000	4,845					
Aberdeen	Council Area	227,430	1,097,330,000	4,825					
Barking and C London Boro	ENG	218,534	1,034,818,000	4,735					
South Tynesid Metropolitan	ENG	147,915	633,508,000	4,283					
East Lothian	Council Area	109,580	449,968,000	4,106					
West Dunbart Council Area	SCO	87,790	358,673,000	4,086					
Perth and Kin Council Area	SCO	153,810	599,422,000	3,897					
Highland	Council Area	238,060	894,404,000	3,757					
Gateshead	Metropolitan	196,154	684,966,000	3,492					
West Lothian	Council Area	185,580	639,221,000	3,444					
Dundee	Council Area	147,720	503,622,000	3,409					
Midlothian	Council Area	94,680	321,314,000	3,394					
Portsmouth	Unitary Autho	206,828	694,340,000	3,357					
East Ayrshire	Council Area	122,020	396,761,000	3,252					
Enfield	London Boro	329,601	1,064,385,000	3,229					
Luton	Unitary Autho	224,826	712,168,000	3,168	6,170	9,173	12,175	15,177	3,856
Aberdeenshir Council Area	SCO	262,690	827,703,000	3,151					
South Lanark Council Area	SCO	322,630	967,972,000	3,000					
Southwark	London Boro	306,374	914,922,000	2,986					
Edinburgh	Council Area	526,470	1,564,520,000	2,972					
Westminster	London Boro	205,087	599,757,000	2,924					
Swansea	Unitary Autho	237,834	693,821,000	2,917					
Croydon	London Boro	390,506	1,101,601,000	2,821					
Brentwood	Non-metropol	77,103	217,019,000	2,815					
Leeds	Metropolitan	809,036	2,247,830,000	2,778					
Torbay	Unitary Autho	139,446	383,014,000	2,747					
Slough	Unitary Autho	158,289	430,000,000	2,717					
Nottingham	Unitary Autho	319,566	868,092,000	2,716					
Wolverhampt Metropolitan	ENG	264,036	703,153,000	2,663					
Haringey	London Boro	264,130	697,634,000	2,641					
Stevenage	Non-metropol	89,320	234,987,000	2,631					
Lambeth	London Boro	317,498	832,666,000	2,623					
Wrexham	Unitary Autho	135,132	349,839,000	2,589					
Birmingham	Metropolitan	1,142,494	2,949,880,000	2,582					
Barnsley	Metropolitan	244,893	632,339,000	2,582					
Eastleigh	Non-metropol	136,974	350,487,000	2,559					
Newham	London Boro	350,626	894,342,000	2,551					
Denbighshire	Unitary Autho	96,046	230,102,000	2,396					
Ealing	London Boro	366,127	874,331,000	2,388					
Cardiff	Unitary Autho	359,512	858,277,000	2,387					
Adur	Non-metropol	64,626	153,527,000	2,376					
Stoke-on-Treer	Unitary Autho	258,037	608,180,000	2,357					
Fife	Council Area	374,730	864,640,000	2,307					
Newcastle up Metropolitan	ENG	298,264	687,272,000	2,304					
Harlow	Non-metropol	93,374	211,837,000	2,269					
South Ayrshir Council Area	SCO	112,450	254,316,000	2,262					
Inverclyde	Council Area	76,700	169,147,000	2,205					
Kingston upor	Unitary Autho	266,463	585,402,000	2,197					
Dacorum	Non-metropol	155,217	337,446,000	2,174					
Blaenau Gwer	Unitary Autho	66,993	145,545,000	2,173					
Carmarthensh	Unitary Autho	188,191	402,424,000	2,138					
Shetland Islan	Council Area	22,940	49,000,000	2,136					
Powys	Unitary Autho	133,557	283,180,000	2,120					
Uttlesford	Non-metropol	91,948	194,006,000	2,110					
Crawley	Non-metropol	118,580	249,325,000	2,103					
Reading	Unitary Autho	173,170	363,670,000	2,100					
Rotherham	Metropolitan	266,183	557,564,000	2,095					
Northumberlai	Unitary Autho	321,558	672,353,000	2,091					
Glasgow	Council Area	635,130	1,314,836,000	2,070					
Brent	London Boro	338,918	699,957,000	2,065					
Dudley	Metropolitan	323,581	663,814,000	2,051					
East Dunbart Council Area	SCO	108,900	222,670,000	2,045					
Welwyn Hatfie	Non-metropol	119,538	243,911,000	2,040					
Epping Forest	Non-metropol	134,909	266,848,000	1,978					
Neath and Po	Unitary Autho	141,931	279,953,000	1,972					
Southend-on-	Unitary Autho	180,601	355,461,000	1,968					
Sutton	London Boro	209,517	407,626,000	1,946					
North Tynesid Metropolitan	ENG	209,151	402,443,000	1,924					
Barnet	London Boro	388,639	745,597,000	1,918					
Flintshire	Unitary Autho	155,076	293,844,000	1,895					
Sunderland	Metropolitan	274,211	519,243,000	1,894					
Gwynedd	Unitary Autho	117,072	220,593,000	1,884					
Manchester	Metropolitan	549,853	1,027,398,000	1,868					
Scottish Bord Council Area	SCO	116,020	209,908,000	1,809					
Plymouth	Unitary Autho	264,727	477,708,000	1,805					
Peterborough	Unitary Autho	216,349	390,459,000	1,805					
Clackmannan	Council Area	51,540	92,185,000	1,789					
North Ayrshire	Council Area	134,220	239,956,000	1,788					
Stockport	Metropolitan	295,243	521,370,000	1,766					
Anglesey	Unitary Autho	68,944	119,570,000	1,734					
Basildon	Non-metropol	187,659	314,301,000	1,675					
Moray	Council Area	96,410	159,942,000	1,659					
Kingston upor	London Boro	167,845	275,926,000	1,644					
Caerphilly	Unitary Autho	176,005	286,085,000	1,625					
Merthyr Tydfil	#N/A	58,866	94,925,000	1,613					
Harrow	London Boro	260,987	417,261,000	1,599					
Kensington ar	London Boro	143,940	229,224,000	1,592					
Sheffield	Metropolitan	554,401	875,417,000	1,579					
Pembrokeshir	Unitary Autho	123,669	192,064,000	1,553					
Middlesbrougl	Unitary Autho	143,734	221,405,000	1,540					
Camden	London Boro	210,390	323,238,000	1,536					
Solihull	Metropolitan	216,666	331,140,000	1,528					
Ceredigion	Unitary Autho	70,658	106,867,000	1,512					
Renfrewshire	Council Area	179,940	271,190,000	1,507					
Blackpool	Unitary Autho	140,954	210,886,000	1,496					
Falkirk	Council Area	160,700	239,303,000	1,489					

York	Unitary Autho	ENG	201,672	298,915,000	1,482
Cambridge	Non-metropol	ENG	144,714	213,572,000	1,476
Milton Keynes	Unitary Autho	ENG	288,201	423,950,000	1,471
Hammersmith London Borou	ENG		183,295	267,453,000	1,459
Derby	Unitary Autho	ENG	261,136	380,388,000	1,457
Hounslow	London Borou	ENG	287,940	418,826,000	1,455
Swindon	Unitary Autho	ENG	233,713	339,428,000	1,452
Stirling	Council Area	SCO	93,470	135,654,000	1,451
North Lanarks	Council Area	SCO	341,400	494,322,000	1,448
Norwich	Non-metropol	ENG	143,118	207,129,000	1,447
Ipswich	Non-metropol	ENG	139,614	200,334,000	1,435
St Albans	Non-metropol	ENG	148,641	211,486,000	1,423
Warwick	Non-metropol	ENG	148,729	208,157,000	1,400
North East De	Non-metropol	ENG	102,315	142,809,000	1,396
Monmouthshii	Unitary Autho	WAL	93,194	128,625,000	1,380
Greenwich	London Borou	ENG	289,254	397,250,000	1,373
Brighton and I	Unitary Autho	ENG	276,334	378,713,000	1,370
Waltham Fore	London Borou	ENG	278,050	378,176,000	1,360
Telford and W	Unitary Autho	ENG	185,842	250,563,000	1,348
Argyll and But	Council Area	SCO	86,220	115,484,000	1,339
Halton	Unitary Autho	ENG	128,577	172,000,000	1,338
Orkney Island	Council Area	SCO	22,540	30,043,000	1,333
East Renfrew	Council Area	SCO	96,580	127,251,000	1,318
Redcar and C	Unitary Autho	ENG	136,616	178,450,000	1,306
Trafford	Metropolitan I	ENG	235,546	303,095,000	1,287
Exeter	Non-metropol	ENG	129,307	165,526,000	1,280
Worthing	Non-metropol	ENG	111,657	141,692,000	1,269
Winchester	Non-metropol	ENG	127,916	161,722,000	1,264
South Cambri	Non-metropol	ENG	163,002	205,123,000	1,258
Cornwall	Unitary Autho	ENG	572,010	716,627,000	1,253
Guildford	Non-metropol	ENG	143,929	178,826,000	1,242
West Northan	Unitary Autho	ENG	426,462	529,231,000	1,241
Oxford	Non-metropol	ENG	160,021	198,628,000	1,241
Salford	Metropolitan I	ENG	270,764	332,800,000	1,229
Doncaster	Metropolitan I	ENG	308,705	377,654,000	1,223
Rhondda Cyn	Unitary Autho	WAL	237,497	288,639,000	1,215
North Northan	Unitary Autho	ENG	360,381	436,782,000	1,212
Chesterfield	Non-metropol	ENG	103,672	125,356,000	1,209
Kirklees	Metropolitan I	ENG	433,355	522,114,000	1,205
Havering	London Borou	ENG	262,022	314,577,000	1,201
Isle of Wight	Unitary Autho	ENG	140,889	168,871,000	1,199
Redditch	Non-metropol	ENG	86,996	103,929,000	1,195
Wigan	Metropolitan I	ENG	329,759	393,166,000	1,192
Central Bedfo	Unitary Autho	ENG	295,541	349,886,000	1,184
East Riding of	Unitary Autho	ENG	343,143	404,079,000	1,178
Mole Valley	Non-metropol	ENG	87,608	102,850,000	1,174
Sandwell	Metropolitan I	ENG	341,729	398,849,000	1,167
Redbridge	London Borou	ENG	309,836	361,203,000	1,166
Southampton	Unitary Autho	ENG	247,256	287,897,000	1,164
Waverley	Non-metropol	ENG	128,878	149,771,000	1,162
Angus	Council Area	SCO	116,120	134,613,000	1,159
Dumfries and	Council Area	SCO	148,790	169,306,000	1,138
West Berkshir	Unitary Autho	ENG	161,865	183,914,000	1,136
Liverpool	Metropolitan I	ENG	484,488	549,996,000	1,135
Tandridge	Non-metropol	ENG	88,143	99,415,000	1,128
Darlington	Unitary Autho	ENG	108,222	120,946,000	1,118
Torfaen	Unitary Autho	WAL	92,453	103,391,000	1,118
Bolsover	Non-metropol	ENG	80,476	89,400,000	1,111
Eastbourne	Non-metropol	ENG	101,593	112,557,000	1,108
Vale of Glamo	Unitary Autho	WAL	132,534	145,656,000	1,099
Surrey Heath	Non-metropol	ENG	90,645	98,695,000	1,089
Bath and Nort	Unitary Autho	ENG	192,423	208,340,000	1,083
Islington	London Borou	ENG	216,767	227,545,000	1,050
Lincoln	Non-metropol	ENG	102,330	107,353,000	1,049
Cherwell	Non-metropol	ENG	161,837	166,000,000	1,026
Babergh	Non-metropol	ENG	92,723	93,562,000	1,009
Canterbury	Non-metropol	ENG	156,554	157,625,000	1,007
Conwy	Unitary Autho	WAL	114,828	115,556,000	1,006
Bury	Metropolitan I	ENG	193,823	190,237,000	981
Cheltenham	Non-metropol	ENG	118,866	115,332,000	970
Hartlepool	Unitary Autho	ENG	92,571	88,769,000	959
Bristol	Unitary Autho	ENG	471,117	445,591,000	946
East Hampshi	Non-metropol	ENG	126,199	119,349,000	946
Ashford	Non-metropol	ENG	133,178	124,464,000	935
Cumberland	Unitary Autho	ENG	273,300	254,015,000	929
Rochdale	Metropolitan I	ENG	224,087	205,036,000	915
Bexley	London Borou	ENG	246,543	223,362,000	906
Norfolk	County	ENG	918,369	828,706,000	902
Shropshire	Unitary Autho	ENG	324,716	286,068,000	881
Blackburn with	Unitary Autho	ENG	154,922	136,228,000	879
Mid Suffolk	Non-metropol	ENG	103,417	90,668,000	877
North East Lin	Unitary Autho	ENG	157,197	135,211,000	860
Westmorland	Unitary Autho	ENG	225,385	192,279,000	853
Newport	Unitary Autho	WAL	159,658	135,499,000	849
Stroud	Non-metropol	ENG	121,529	100,717,000	829
Bassetlaw	Non-metropol	ENG	118,351	96,863,000	818
Great Yarmou	Non-metropol	ENG	100,146	81,386,000	813
Durham	Unitary Autho	ENG	521,346	423,150,000	812
Cannock Cha	Non-metropol	ENG	100,590	81,605,000	811
Walsall	Metropolitan I	ENG	284,306	230,389,000	810
North Lincoln	Unitary Autho	ENG	169,940	136,017,000	800
Tamworth	Non-metropol	ENG	78,838	63,060,000	800
Hillingdon	London Borou	ENG	304,792	242,921,000	797
Epsom and E	Non-metropol	ENG	80,998	64,427,000	795
Broxtowe	Non-metropol	ENG	110,813	87,637,000	791
Gravesham	Non-metropol	ENG	106,838	84,218,000	788
Wiltshire	Unitary Autho	ENG	513,411	396,110,000	772
Isles of Scilly	Unitary Autho	ENG	2,271	1,750,000	771
Gloucester	Non-metropol	ENG	132,538	101,922,000	769
Colchester	Non-metropol	ENG	192,424	147,674,000	767
West Lancast	Non-metropol	ENG	117,125	88,212,000	753
St Helens	Metropolitan I	ENG	183,391	137,518,000	750
Cambridgeshi	County	ENG	680,407	505,397,000	743
Bradford	Metropolitan I	ENG	546,976	403,406,000	738
North Kestve	Non-metropol	ENG	118,553	86,978,000	734
Worcestershir	County	ENG	604,947	439,717,000	727
Newark and S	Non-metropol	ENG	123,383	89,755,000	727

Knowsley	Metropolitan [ENG	154,974	112,379,000	725
Rugby	Non-metropol ENG	114,829	83,299,000	725
Lancashire	County ENG	1,236,035	887,121,000	718
Hastings	Non-metropol ENG	90,959	65,094,000	716
Wokingham	Unitary Autho: ENG	178,169	127,005,000	713
South Holland	Non-metropol ENG	95,485	67,456,000	706
Mansfield	Non-metropol ENG	110,602	77,875,000	704
Coventry	Metropolitan [ENG	343,320	231,077,000	673
New Forest	Non-metropol ENG	176,262	118,204,000	671
North Yorkshii	County ENG	618,847	413,379,000	668
Oldham	Metropolitan [ENG	242,072	160,996,000	665
Bridgend	Unitary Autho: WAL	145,760	96,867,000	665
Cheshire Wes	Unitary Autho: ENG	357,699	237,509,000	664
Ashfield	Non-metropol ENG	126,372	82,536,000	653
Lewisham	London Borol ENG	299,810	194,978,000	650
Herefordshire	Unitary Autho: ENG	187,557	121,250,000	646
High Peak	Non-metropol ENG	91,104	58,777,000	645
North Warwic	Non-metropol ENG	65,340	41,979,000	642
Bracknell Fore	Unitary Autho: ENG	125,174	80,000,000	639
Bournemouth	Unitary Autho: ENG	400,109	251,984,000	630
Calderdale	Metropolitan [ENG	206,818	129,790,000	628
Hinckley and I	Non-metropol ENG	113,660	70,993,000	625
Burnley	Non-metropol ENG	94,721	59,247,000	625
Devon	County ENG	814,440	507,849,000	624
Tameside	Metropolitan [ENG	231,199	142,121,000	615
Folkestone an	Non-metropol ENG	110,056	67,155,000	610
North Somers	Unitary Autho: ENG	217,399	132,050,000	607
Melton	Non-metropol ENG	51,773	31,413,000	607
Gosport	Non-metropol ENG	82,178	49,600,000	604
Windsor and I	Unitary Autho: ENG	153,921	92,715,000	602
Lincolnshire	County ENG	769,474	460,091,000	598
Dover	Non-metropol ENG	116,595	69,375,000	595
North West Le	Non-metropol ENG	105,011	61,971,000	590
South Kestev	Non-metropol ENG	143,787	84,602,000	588
Nottinghamsh	County ENG	826,257	481,417,000	583
Wirral	Metropolitan [ENG	320,600	183,038,000	571
Chorley	Non-metropol ENG	117,937	67,368,000	571
East Devon	Non-metropol ENG	152,120	83,581,000	549
Bolton	Metropolitan [ENG	296,041	158,000,000	534
West Sussex	County ENG	885,055	467,190,000	528
Wakefield	Metropolitan [ENG	353,802	186,153,000	526
Richmond upr	London Borol ENG	195,232	102,709,000	526
Buckinghamsl	Unitary Autho: ENG	555,257	289,240,000	521
Rutland	Unitary Autho: ENG	41,381	21,386,000	517
Kent	County ENG	1,578,519	787,031,000	499
Suffolk	County ENG	763,375	370,067,000	485
West Devon	Non-metropol ENG	57,488	27,726,000	482
Lewes	Non-metropol ENG	100,194	47,673,000	476
Warwickshire	County ENG	599,153	272,975,000	456
Staffordshire	County ENG	877,856	398,500,000	454
Sefton	Metropolitan [ENG	279,692	125,898,000	450
Charnwood	Non-metropol ENG	182,817	81,190,000	444
Leicester	Unitary Autho: ENG	366,018	154,490,000	422
Nuneaton and	Non-metropol ENG	134,291	56,705,000	422
Fareham	Non-metropol ENG	114,993	48,000,000	417
Mid Devon	Non-metropol ENG	83,186	34,330,000	413
Lancaster	Non-metropol ENG	142,162	58,480,000	411
Oxfordshire	County ENG	726,530	297,383,000	409
East Sussex	County ENG	546,924	216,591,000	396
Essex	County ENG	1,506,345	589,818,000	392
Stockton-on-T	Unitary Autho: ENG	197,030	76,965,000	391
Surrey	County ENG	1,205,616	463,599,000	385
Ards and Nort	Local Governr NI	163,827	62,725,000	383
South Glouce	Unitary Autho: ENG	290,736	110,221,000	379
Dorset	Unitary Autho: ENG	381,292	143,416,000	376
Causeway Co	Local Governr NI	141,664	52,048,000	367
Castle Point	Non-metropol ENG	89,708	32,850,000	366
Elmbridge	Non-metropol ENG	139,369	50,358,000	361
Mid and East .	Local Governr NI	139,127	50,030,000	360
Gloucestershii	County ENG	646,627	226,778,000	351
South Derbysl	Non-metropol ENG	108,063	37,423,000	346
Oadby and W	Non-metropol ENG	57,753	19,025,000	329
Derbyshire	County ENG	796,847	254,174,000	319
Newry, Mourm	Local Governr NI	182,345	57,285,000	314
Wyre Forest	Non-metropol ENG	101,786	32,000,000	314
Bedford	Unitary Autho: ENG	185,761	57,390,000	309
Leicestershire	County ENG	712,572	219,752,000	308
Hertfordshire	County ENG	1,200,620	359,705,000	300
Merton	London Borol ENG	215,324	63,700,000	296
Rother	Non-metropol ENG	93,429	26,827,000	287
Wealden	Non-metropol ENG	160,749	44,312,000	276
Dartford	Non-metropol ENG	116,777	32,203,000	276
Antrim and Ne	Local Governr NI	145,852	39,152,000	268
East Suffolk	Non-metropol ENG	246,801	65,565,000	266
Hackney	London Borol ENG	259,956	65,550,000	252
Armagh City, I	Local Governr NI	219,127	54,765,000	250
Derry City and	Local Governr NI	150,834	36,986,000	245
Boston	Non-metropol ENG	70,798	16,449,000	232
Tendring	Non-metropol ENG	148,934	33,988,000	228
Tower Hamlet	London Borol ENG	312,273	68,709,000	220
Arun	Non-metropol ENG	165,225	35,460,000	215
Pendle	Non-metropol ENG	95,789	20,359,000	213
Tewkesbury	Non-metropol ENG	95,429	20,333,000	213
Cheshire East	Unitary Autho: ENG	400,528	77,243,000	193
Huntingdonsh	Non-metropol ENG	181,804	34,277,000	189
West Lindsey	Non-metropol ENG	95,570	16,500,000	173
Worcester	Non-metropol ENG	103,617	16,691,000	161
South Hams	Non-metropol ENG	89,213	13,924,000	156
Watford	Non-metropol ENG	102,451	15,000,000	146
Hart	Non-metropol ENG	100,293	14,524,000	145
Hampshire	County ENG	1,406,199	197,402,000	140
East Lindsey	Non-metropol ENG	142,951	20,000,000	140
South Norfolk	Non-metropol ENG	142,527	20,000,000	140
Thanet	Non-metropol ENG	140,678	19,718,000	140
South Stafforc	Non-metropol ENG	110,793	15,000,000	135
Belfast	Local Governr NI	345,006	41,166,000	119
Hyndburn	Non-metropol ENG	82,261	9,520,000	116

Sevenoaks	Non-metropol ENG	120,841	12,123,000	100
Gedling	Non-metropol ENG	117,298	10,812,000	92
Three Rivers	Non-metropol ENG	93,952	8,000,000	85
Preston	Non-metropol ENG	147,617	12,289,000	83
Wandsworth	London Boro. ENG	328,367	26,498,000	81
Fenland	Non-metropol ENG	102,742	7,800,000	76
Derbyshire De	Non-metropol ENG	71,681	5,450,000	76
Rushmoor	Non-metropol ENG	100,068	7,500,000	75
King's Lynn ar	Non-metropol ENG	154,910	10,000,000	65
Blaby	Non-metropol ENG	103,271	5,822,000	56
West Suffolk	Non-metropol ENG	180,820	9,625,000	53
Rossendale	Non-metropol ENG	71,010	3,716,000	52
Test Valley	Non-metropol ENG	131,190	6,421,000	49
East Staffords	Non-metropol ENG	124,477	6,020,000	48
Staffordshire I	Non-metropol ENG	95,993	4,604,000	48
Braintree	Non-metropol ENG	155,710	5,600,000	36
Fermanagh ar	Local Governr NI	116,926	3,535,000	30
North Devon	Non-metropol ENG	99,435	3,000,000	30
Maidstone	Non-metropol ENG	176,712	5,000,000	28
Mid-Ulster	Local Governr NI	150,598	3,735,000	25
Havant	Non-metropol ENG	124,470	2,993,000	24
Harborough	Non-metropol ENG	98,287	1,490,000	15
East Hertford	Non-metropol ENG	150,687	1,500,000	10
Lichfield	Non-metropol ENG	106,909	1,035,000	10
Torridge	Non-metropol ENG	68,475	482,000	7
Chelmsford	Non-metropol ENG	181,763	1,135,000	6
North Hertfor	Non-metropol ENG	133,571	357,000	3
Bromley	London Boro. ENG	329,830	0	0
Basingstoke a	Non-metropol ENG	185,656	0	0
Mid Sussex	Non-metropol ENG	152,949	0	0
Swale	Non-metropol ENG	152,223	0	0
Reigate and B	Non-metropol ENG	151,423	0	0
South Oxford	Non-metropol ENG	150,024	0	0
Lisburn and C	Local Governr NI	149,272	0	0
Horsham	Non-metropol ENG	147,487	0	0
Breckland	Non-metropol ENG	142,164	0	0
Vale of White	Non-metropol ENG	139,487	0	0
Stafford	Non-metropol ENG	137,231	0	0
Stratford-on-A	Non-metropol ENG	135,964	0	0
Teignbridge	Non-metropol ENG	135,216	0	0
Wychavon	Non-metropol ENG	133,100	0	0
Tonbridge anc	Non-metropol ENG	132,386	0	0
Broadland	Non-metropol ENG	132,247	0	0
Amber Valley	Non-metropol ENG	126,489	0	0
Chichester	Non-metropol ENG	124,531	0	0
Newcastle-unr	Non-metropol ENG	123,025	0	0
Rushcliffe	Non-metropol ENG	119,438	0	0
Tunbridge We	Non-metropol ENG	115,681	0	0
West Oxford	Non-metropol ENG	115,161	0	0
Erewash	Non-metropol ENG	113,047	0	0
Wyre	Non-metropol ENG	112,457	0	0
South Ribble	Non-metropol ENG	111,204	0	0
Hertsmere	Non-metropol ENG	108,105	0	0
North Norfolk	Non-metropol ENG	103,257	0	0
Bromsgrove	Non-metropol ENG	99,475	0	0
Broxbourne	Non-metropol ENG	99,138	0	0
Cotswold	Non-metropol ENG	91,125	0	0
East Cambrid	Non-metropol ENG	88,145	0	0
Forest of Dea	Non-metropol ENG	87,140	0	0
Rochford	Non-metropol ENG	86,186	0	0
Fylde	Non-metropol ENG	81,845	0	0
Malvern Hills	Non-metropol ENG	79,973	0	0
Maldon	Non-metropol ENG	66,627	0	0
Ribble Valley	Non-metropol ENG	61,907	0	0
City of Londo	London Boro. ENG	8,618	0	0