

LOCAL GOVERNMENT AND PUBLIC INVOLVEMENT IN HEALTH ACT 2007

Response to Invitation to Submit Proposals for a Single Tier of Local Government

Finding the Balance, Building the Future



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Foreword

The submission of this Interim Plan responds to the formal invitation received on the 5th February to submit proposals for a single tier of local government. It addresses the intent, as outlined in the English Devolution White Paper, for Local Government Reorganisation (LGR) and the replacement of existing district and county councils and smaller unitaries with larger unitary authorities.

We, the Leaders of seven of the district councils of Devon together with the Leader of Torbay Council, acknowledge the government's intent and are committed to responding constructively to this. We have collaboratively developed interim proposals to meet the government's initial deadline. We propose the creation of two new unitary councils (alongside the retention of Plymouth City unitary): one encompassing South Hams, Teignbridge, West Devon, and Torbay, and the other uniting East, Mid, North Devon, Torridge, and Exeter. We believe this model better serves the interests of Devon and Torbay's nearly one million residents rather than a single 'mega-council'.

Despite the progress made in developing these proposals, we have significant concerns and reservations regarding the proposed scale and timeline for LGR, particularly its potential for financial unsustainability. The existing system, while imperfect, delivers effective, locally tailored services and possesses established community connections and a strong sense of place. We believe the government's proposals fail to address the critical funding challenges facing Devon and Torbay, notably in Adult and Children's Social Care, Special Educational Needs and Disabilities, and in the NHS.

This submission represents an initial framework for how two new local authorities could be formed. There is considerable further work required to develop these proposals. We are actively engaged in this further development, including ongoing dialogue with Torbay Council, and are mindful of the need for flexibility and agility as the LGR process evolves. We are committed to maintaining local distinctiveness while pursuing service improvements and we will engage extensively with residents, partners, and stakeholders throughout this process.



Executive Summary

This Interim Plan responds to the government's invitation for Local Government Reorganisation (LGR) towards a single tier. Acknowledging the English Devolution White Paper's intent to replace existing councils with larger unitary authorities, this submission proposes a balanced two-unitary solution for Devon and Torbay, alongside Plymouth City as a retained unitary authority, aiming to meet LGR objectives while preserving local identity and ensuring sustainable service delivery.

The proposed two-unitary model aligns with the six criteria for unitary government, using existing district areas as building blocks and aiming for populations near 500,000 for each authority. The proposed model anticipates the creation of a;

- **Southern Devon Authority:** South Hams, Teignbridge, West Devon, and Torbay
- **Exeter and Northern Devon Authority:** East, Mid, North Devon, Torridge, and Exeter

This offers a comprehensive solution for the whole area, establishing a credible alternative to a single 'mega' Council whilst guarding against the creation of an urban/rural divide

The Interim Plan recognises that significant further work is required to develop these proposals. A programme is set out for how this will happen through to November 2025. This includes extensive stakeholder engagement.

Structure

The structure of this submission seeks to address the criteria set out in the Minister of State's letter of the 5th February. Specific sections are as follows;

Section 1: Introduction and context

Section 2: Vision for public service delivery and case for change

Section 3: Design principles, options assessment

Section 4: Local distinctiveness

Section 5: Response to criteria a) – h) in the Minister of State's letter

Section 6: Conclusion and next steps

NOTE: Within this document reference to the "county" or "Devon" refers to the area covered by Devon County Council, Plymouth City Council and Torbay Council. Devon County Council will always be referred to as such.

1. Introduction and context

This submission is presented by the Leaders of seven of the District Councils of Devon together with the Leader of Torbay Council in response to the UK Government's invitation to propose a single tier of local government, as outlined within the context of the English Devolution White Paper. We recognise the government's ambition to streamline local governance and drive regional economic growth through enhanced devolution.

Whilst the Leader of Torbay Council is a signatory to this response, Torbay Council is submitting a range of options which it wishes to explore in developing a full proposal. It is important to also recognise that separate proposals are being submitted on behalf of Exeter City Council as well as Devon County Council and Plymouth City Council.

The county of Devon is home to world leading research institutions and innovative companies. Its cultural scene is equally diverse, with a thriving arts community, numerous festivals, and a rich culinary tradition. The population of Devon continues to grow faster than the national average with housing developments including three new towns. It is also renowned for its outstanding natural beauty, charming villages, and rich agricultural heritage. This includes two National Parks – Dartmoor and Exmoor.

Devon possesses significant potential for clean growth, driven by its unique natural assets and strategic initiatives. The region is poised to capitalise on its maritime heritage through advancements in clean maritime technologies, particularly within North Devon and Torridge, where projects like the Appledore Clean Maritime Innovation Centre are fostering innovation. Furthermore, the development of offshore renewable energy, including floating offshore wind in the Celtic Sea, presents substantial opportunities for job creation and economic stimulation. Coupled with ongoing research and development at institutions like the University of Exeter, focusing on areas such as renewable energy, sustainable agriculture, and the circular economy, Devon is establishing itself as a key player in the UK's transition to a low-carbon future.

Devon also has scope and scale to deliver significant housing growth in future years through a variety of identified and strategic sites. The recent Devon Housing Commission evidences the strategic collaboration of the authorities behind this proposal and the new authorities proposed would be empowered to take maximum advantage of the opportunities as identified by Lord Best in his report. Crucially, the boundaries proposed would allow each of the new authorities to meet their own growth ambitions and deliver truly sustainable, balanced growth, rather than seeking to hive off strategic growth opportunities through limited boundary expansions of city areas.

This housing growth will complement our economic ambition for the whole of Devon and has the potential to address a number of our local housing challenges as well as unlocking significant economic activity.

Devon's district councils have a proud history of delivering high-quality, locally tailored services to our diverse communities. We understand the unique needs of our residents and have fostered strong partnerships with local stakeholders over many years. This deep-rooted connection to our communities is fundamental to our approach and wider sense of place.

While we acknowledge the government's desire for structural reform, we are also acutely aware of the significant challenges facing public service delivery in Devon, particularly in areas such as adult and children's social care, special educational needs and disabilities (SEND), and the funding pressures confronting the NHS. This is coupled with deep seated constraints including below average levels of productivity, above average house prices and variable levels of connectivity. We believe that any reorganisation must address these critical issues, rather than risk destabilising the existing structures that currently deliver essential services.

This submission outlines our considered response, reflecting our commitment to both the government's objectives and the best interests of the 1.25 million residents across the historic county of Devon. It details our collaborative efforts to develop proposals that strike the right balance - to maintain local distinctiveness, enhance service delivery, and ensure long-term financial sustainability within the evolving landscape of English devolution. Our preference is for a well-planned, bottom-up approach to further integrate services and to realise the associated savings and efficiencies.

2. Vision for public service delivery

Our forward-thinking vision for public service delivery in Devon centres on creating a connected, resilient, and responsive system that prioritises the well-being of all our residents. Key aspects of this vision include:

- **Local distinctiveness:**
 - Ensuring that future arrangements maintain a strong sense of place including an ability to meet the unique needs of individual communities and to harness distinctive opportunities
 - Strengthening the role of parish and town councils as the most local tier of government.
- **Digital Transformation:**
 - Leveraging technology to enhance accessibility and efficiency, with online platforms providing seamless access to services.

- Bridging the digital divide to ensure all residents, particularly those in rural areas, can benefit from digital services regardless of location, age or wider socio-economic factors.
- **Integrated Care:**
 - Fostering closer collaboration between health, social care, and other public services to provide holistic support.
 - Focusing on preventative measures and early intervention to improve long-term health and well-being.
- **Community Empowerment:**
 - Strengthening local partnerships and empowering communities to play a more active role in shaping service delivery.
 - Promoting citizen engagement and feedback to ensure services are responsive to local needs.
- **Sustainability:**
 - Integrating environmental sustainability into all aspects of public service delivery.
 - Supporting the region's transition to a low-carbon economy and as a leader for clean growth
- **Resilience:**
 - Building strong, adaptable services that can respond effectively to future challenges, including climate change and economic uncertainty.
 - ensuring that vulnerable individuals are given the support they need during times of crisis.

This vision emphasises a people-centred approach, where public services are not just delivered, but co-created with the communities they serve.

Case for change

The case for change in Devon's local government public service delivery rests on several converging factors demanding a more agile, efficient, and citizen-centric approach. These are detailed below;

- 1) Demographic shifts, including an aging population and increasing rural isolation, necessitate tailored services that address complex social care needs and ensure equitable access, regardless of location.

- 2) The climate crisis demands rapid decarbonisation and adaptation, requiring local government to lead in sustainable development, integrating environmental considerations into all service areas.
- 3) Fiscal pressures and rising demand necessitate innovative solutions to deliver more with less, leveraging technology and community partnerships to enhance efficiency and reduce costs.
- 4) Evolving citizen expectations, driven by digital literacy and a desire for greater transparency and participation, require a shift towards more accessible, responsive, and digitally enabled services.
- 5) The need to build community resilience in the face of economic uncertainty and potential future crises necessitates a more integrated, preventative, and locally empowered approach to public service delivery.

Therefore, a fundamental transformation is vital to ensure Devon's local government remains effective, sustainable, and responsive to the evolving needs of its communities.

3. Design Principles

In considering the potential options for the reorganisation of current structures, we have first sought to draw upon two key guidelines, as set out in the Minister of State's letter, as foundations upon which to develop wider principles. These keystones are that;

- existing district areas should be considered the building blocks for proposals
- new councils should aim for a population of 500,000 or more

Further to these, the following design principles have helped to shape and influence the development of our proposals;

- The new authorities and services will be built from an understanding of people and place
- Reflect established functional relationships and markets (including travel to work, shopping patterns, hospital catchments, education provision etc) as well as the cultural and historic context
- Recognise the important influence of existing strategic road and rail networks and associated connectivity
- Provide for a polycentric approach, recognising the important role of local service centres particularly in serving wider rural areas
- Harness the role of the main urban centres as key economic drivers
- Underpin future financial resilience and sustainability by ensuring broad parity between different constituent parts of any options in terms of

- key baseline metrics (such as resources per head),
- a similar share of social care and other “needs” ensuring that no area is left behind

4. Options assessment

With a population in excess of 1.25 million people distributed across 6500 km², the historic county of Devon is the fourth largest by area and 12th largest by population in England. The two tier area covered by Devon County Council includes eight District Councils. Torbay and Plymouth City Councils are existing unitaries.

Future changes to local governance structures and service delivery arrangements need to achieve the right balance of population size and economies of scale with the practicalities of the geography, culture, society and economy of Devon. Change should also reflect and enhance the communities that have developed under present boundaries whilst optimising efficiencies in service delivery.

Over the course of the last 3 months since the Devolution White Paper was published five main options have emerged. These are;

- | | |
|--|---------------------------------|
| <ol style="list-style-type: none"> 1) A single unitary council covering the Devon County Council and Torbay areas 2) Two unitary councils covering the Devon County Council and Torbay areas | <p>Without boundary changes</p> |
| <hr style="border-top: 1px dashed #0070C0;"/> | |
| <ol style="list-style-type: none"> 3) An expanded Plymouth City unitary 4) An expanded Torbay unitary 5) A new Exeter City unitary | <p>With boundary changes</p> |

Options 1 and 2 use existing local government units as the building blocks for the proposals as the clear preference of government. However, options 3-5 inclusive necessarily involve significant boundary changes. These have not been considered as part of this assessment.



Figure 1: Map showing Option 2

Nationally, experience points definitively to the fact that Devon is far too large to enable a single authority to be efficient and effective whilst retaining a sense of place and community. The largest existing unitary authority by land area, North Yorkshire, has a population of 627,000 just over half of Devon's. Most unitary authorities are much smaller with populations between 100,000 and 300,000. The English Devolution White Paper sets a guiding principle for new councils of 500,000 but recognises that in certain scenarios this figure may not make sense for an area. A single unitary council would serve a population that is well in excess of the upper limit of 700,000-800,000 previously indicated in Government guidance.

For Devon, this clearly points towards the creation of two new unitary authorities alongside Plymouth City Council. The geography, population distribution, strategic transport infrastructure and existing local authority boundaries across Devon lend itself to a natural division into two areas whilst retaining Plymouth City Council unitary on its existing footprint. The proposals set out below firmly accords with the guiding principles.

This interim plan therefore focuses on a two unitary authority solution (alongside the existing Plymouth unitary authority). This also creates the opportunity to establish a fresh culture that develops new and dynamic capabilities and can better implement transformational change to ensure that, together, the two new unitary Councils are able to both secure efficiency savings and adapt to the changing service needs of residents.

Benefits assessment

The initial conclusion from independent financial modelling by Pixel is that the two unitary councils would be sustainable based upon an analysis of disaggregated costs.

This will require thorough testing through the business case development phase. Both authorities would have population sizes that are close to the 500,000 threshold; both would have a similar share of social care and other “needs”; and both would also have large council tax income per head, with the potential to generate substantial future increases in revenue. Both unitaries would be larger than 90% of the existing single-tier authorities – so they would be substantial even by the single measure of population.

Total estimated resources for the two authorities alongside Plymouth are set out in the table below;

Type	Exeter and Northern Devon (£m)	Southern (£m)	Plymouth (£m)
Total Business Rate income	137.8	101.4	84.2
Total Council Tax	384.4	320.0	145.7
Total grant funding	126.6	127.2	95.7
Total resources	648.9	548.6	325.6
Total resources (per head)	1,322.04	1,383.41	1,254.50
Total resources (share %)	43%	36%	21%

Table 1: Total Estimated Resources

Source: www.pixelfinancial.co.uk 2025

This table demonstrate that resources are evenly distributed on a per capita basis across the three authorities. This is considered to be a fundamental benefit of the proposal, enabling a balanced approach from the outset.

The proposed two-unitary council structure offers several distinct advantages, including:

- Creating two equally sized and balanced councils, each serving a manageable population
- Enhancing local accessibility and accountability compared to a single, large entity
- Better reflecting existing community structures and resident lifestyles
- Generating potential for significant cost savings
- Decentralising key upper tier service delivery, bringing them closer to communities
- Facilitating devolution and enabling the establishment of a Mayor for a broader Peninsular Strategic Authority

- Optimising the balance between strategic planning and operational execution, aligning seamlessly with a new strategic authority
- Promoting wider collaboration by aligning with existing local public service boundaries

5. Local distinctiveness

This section sets out the distinctive attributes of the two proposed authorities. We anticipate that there will be both opportunities for shared service delivery across the two authorities and a significant role for parish and town councils. These aspects will be developed further as part of the final proposals. In some areas we are united by our differences – the current stock holding authorities (Housing Revenue Account) are solely in the Exeter and Northern area for example.

Southern Devon Authority

The proposed Southern Devon authority would combine South Hams, West Devon, Teignbridge, and Torbay Council, creating a new administrative entity with a population of around 430,000. This aligns with the English Devolution White Paper and aims to enhance service delivery without boundary changes.

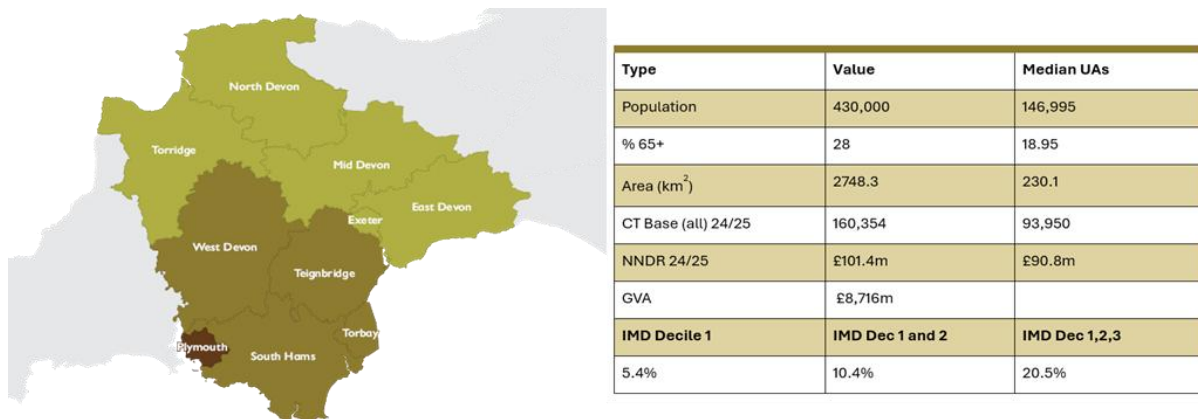


Figure 2: Key data for Southern Devon Authority

Geographical and Economic Synergies

The area is characterised by natural synergies, with Dartmoor National Park to the north and coastal communities to the south. The economy is diverse, with strengths in marine, tourism, agriculture, and environmental digital innovation. The region also has significant potential for clean growth technologies. Torbay's combination of established companies, specialised facilities like the Electronics and Photonics Innovation Centre (EPIC), and a strong industry cluster makes it a prominent centre for photonics.

Operational Synergies and Efficiencies

The four councils have a history of collaboration in areas like building control, procurement, emergency planning and community safety. The new authority will aim to further integrate services, delivering savings and efficiencies. Shared service models, like those between South Hams and West Devon, with a single workforce and fully integrated systems and processes, will be expanded. This provides a blueprint for change which is both sustainable and cost-effective. None of the four existing councils have a Housing Revenue Account which simplifies operational synergies.

Strategic Infrastructure and Connectivity

The new authority will benefit from strategic road and rail networks, supporting both local and regional economies. There are already plans to align concessionary bus travel within the context of an approved a Joint Local Transport Plan for Devon and Torbay.

Health and Social Care Integration

Torbay's integrated health and social care model has been successful in reducing staff shortages and speeding up hospital discharges. This successful approach could be part of the answer to the Government's challenge of reforming NHS and social care and it is hoped that appropriate support is available from the Government to retain integration in Torbay and, ideally, expand the integration to cover the wider geography of a new unitary authority.

Educational and Training Opportunities

South Devon College offers a range of courses aligned with key sectors like marine, construction, and green technology. The new authority will leverage these educational resources to support economic growth.

Alignment with Health and Safety Services

The new authority will align with the Torbay and South Devon NHS Foundation Trust and existing police and fire services. The council will align with the West Devon and South Devon Local Care Partnerships, providing a platform to deliver stronger- place based interventions with NHS and health system partners. Overall, this alignment will enable improved person-centred care and deliver stronger place-based interventions.

Environmental and Clean Growth Initiatives

The area has significant potential for clean growth, with initiatives in renewable energy and environmental innovation. The new authority will support the UK's ambition to become a clean energy superpower.

Community and Place-Making

The proposals emphasise preserving the unique identities of the cities of Plymouth and Exeter, our towns and villages in Southern Devon. The new authority has the potential to drive sustainable growth and improve the quality of life for residents.

Exeter and Northern Devon Authority

The proposed Exeter and Northern Devon authority would cover what is currently an area of five district councils, North, Mid and East Devon along with Torridge and Exeter City. This new authority would have a population of over 542,000, making it the third largest authority in the South West and within the ten largest in the country by population. It would become the largest authority in the region by area.

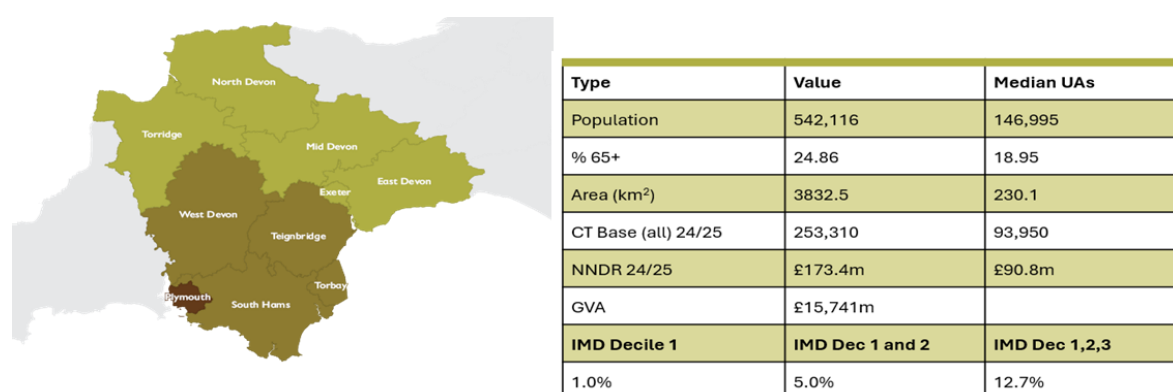


Figure 3: Key data for Exeter and Northern Devon Authority

Place and Place-Making

Exeter has the second largest travel to work area in the country. The area covered by the new authority has a strong history of shared place-making and visioning amongst its partners. There exists a commonality of experience across market town revitalisation and addressing coastal deprivation and associated challenges.

Operational Synergies and Scope for Efficiencies

There is clear scope for efficiency in delivery and greater resilience within this new authority. Shared service arrangements already exist amongst a number of the current councils, including shared procurement, economic development or joint customer-facing entities such as the joint North and Mid Devon building control function. The new authority will generate structural savings through simplified management arrangements.

Alignment with Relevant Geographies

The new authority would see broad alignment of its geography with the Royal Devon University Healthcare NHS Foundation Trust. The new authority would cover the areas

of the One Northern Devon health locality partnership as well as the One Eastern Devon health locality partnership.



Figure 4: Current configuration of health services

Broad and Diverse Economy

The economy of this new authority area will be mixed, providing a balance between emerging knowledge and data industries alongside bedrock sectors such as agriculture, food production, tourism and a range of manufacturing – from the dockyard of Appledore to the advanced fabric manufacturing in Tiverton whose parachutes help NASA land rovers on Mars. Importantly, these are myriad strengths from which to tackle our structural productivity challenges, where persistent physical and digital connectivity issues stifle growth, and where skills deficits strangle ambition. The new authority will be at the forefront of data-led activity in the field of climate science.

Educational and Training Opportunities

Exeter, Petroc and Bicton Colleges all serve the area covered by the new authority, providing high quality training and skills development opportunities. The University of Exeter is also a member of the Russell Group of Universities and an anchor institution in supporting the transition to a knowledge driven economy.

Strategic Infrastructure and Connectivity

Key road strategic corridors such as the M5, A30/A303 and A361 are all matched by adjacent rail corridors. These have a fundamental bearing on the functioning of housing and labour markets and provide opportunities for geographically focused service delivery from area offices. The presence of Exeter Airport also has the potential to increase international connectivity as well as supporting in-bound tourism.

5. Response to criteria

The following section details the response to criteria a) to h) as set out in the Ministerial letter of the 5th February;

a) identify any barriers or challenges where further clarity or support would be helpful.

Within a largely rural county the potential for economic and housing growth needs targeted support to unlock its potential. Support that is most effectively provided by authorities with a firm understanding of place and local connection to its businesses and communities. As explained, a single Devon Unitary Authority is too large to deliver effective, efficient services whilst ensuring that services are connected to place. Therefore, in developing proposals for multiple unitary authorities, careful consideration will need to be given to the potential for economic and housing growth which does not disadvantage the other unitary authorities.

In working together, it is essential that the data held by Devon County Council on its upper tier functions is shared openly at the lowest possible level. This has not yet been forthcoming, so current modelling has been based on pro-rata disaggregation simply to test financial sustainability. This more refined data will help to ensure that the final proposals are based on accurate information about the needs of the populations and communities of the new authorities. We are committed to ensure a single, comprehensive data set is available.

The potential impact, or otherwise, on the delivery of National Park Authority functions will need to be considered and, in the case of Exmoor National Park Authority, how the relationship with Somerset Council is maintained and strengthened.

Two areas where additional help would assist in expediting the development of the proposals would be the identification of a single point of contact/sponsor in central government to enable timely decision making alongside the provision of capacity funding to support ongoing analysis and testing of options. In addition to this we have identified the following areas where additional support and clarity would be helpful;

Financial Framework:

- Clarification of long-term funding models for new unitary and combined authority structures, including revenue and capital funding.

- Detailed guidance on the treatment of existing debt and assets across the current councils.
- Support in modelling and forecasting the financial impact of various reorganisation options – this will build upon the disaggregation analysis undertaken to date.
- Confirmation of how implementation costs will be funded including provisions around capital directions.

Legislative Framework:

- Confirmation of likely consultation arrangements.
- Clear and timely legislative guidance on the powers and responsibilities of new structures, particularly regarding planning, housing, and social care.
- Guidance on the transition process, including staff transfer, contract management, and data migration.

Service Integration:

- Support in developing robust service integration plans to ensure seamless transition and avoid disruption to frontline services.
- Availability of a single data set for service costs which is tailored to the preferred geographies.
- Guidance on best practices for aligning IT systems and data management across merged entities.

Local Government Boundary Commission for England

- Clarification of impact of any potential review to Plymouth City's boundaries including availability of resources and likely timescales

Rurality and Coastal Needs:

- Recognition of the unique needs of Devon's large rural and coastal areas

b) identify the likely options for the size and boundaries of new councils that will offer the best structures for delivery of high-quality and sustainable public services across the area, along with indicative efficiency saving opportunities.

As outlined above, our analysis demonstrates that the proposed formation of two unitary councils covering Southern Devon and Exeter and Northern Devon would best match the ambitions and criteria set out in the English Devolution White Paper. The key metrics for these authorities are set out in the table below including benchmarking against the median for current unitary authorities in England;

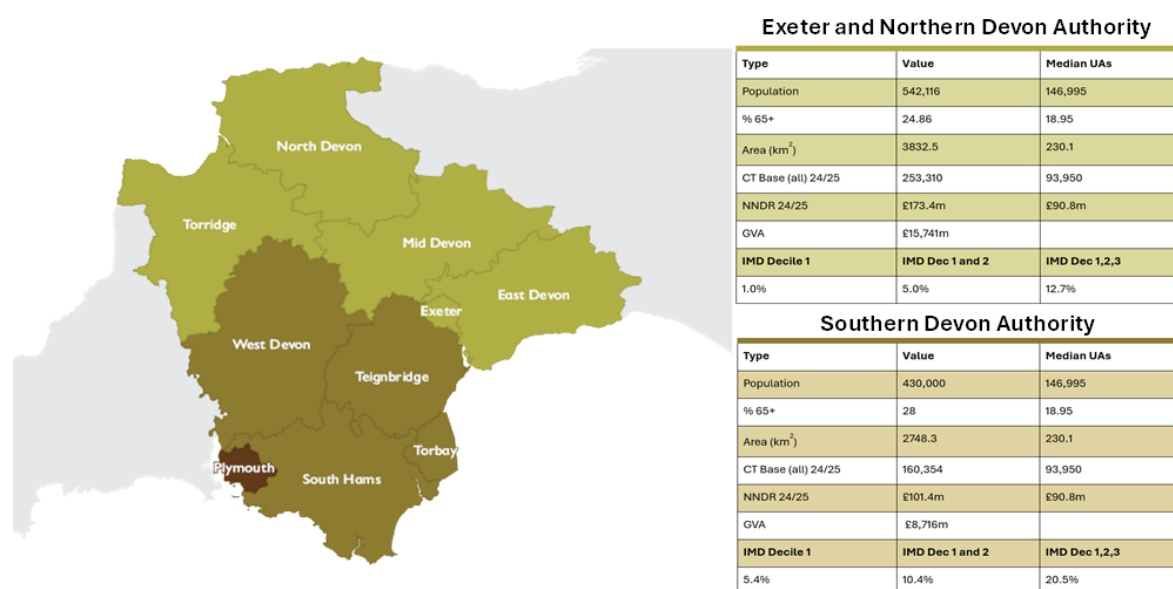


Figure 5: Key data for the two proposed Authorities

We have commissioned initial independent financial analysis and have considered potential costs and benefits by using various financial benchmarks. Given the uncertainty around the savings that have been achieved in previous unitary rounds, we have sought to stress-test these savings and cost assumptions.

c) include indicative costs and arrangements in relation to any options including planning for future service transformation opportunities.

Potential transformation costs are difficult to estimate but we consider these to be at least £5m per district, potentially up to £10m.

This is an area of work that will need considerable further development, testing and verification including considering how difficult areas such as debt are treated. Given the number of alternative options that are being put forward across Devon, we are mindful that all financial analysis needs to be underpinned by a single, agreed data set and we are committed to supporting the establishment of this.

- d) include early views as to the councillor numbers that will ensure both effective democratic representation for all parts of the area, and also effective governance and decision-making arrangements which will balance the unique needs of your cities, towns, rural and coastal areas, in line with the Local Government Boundary Commission for England guidance.**

Our starting point has been to compare potential arrangements with other large rural unitary authorities. This gives a range of between 4500 and 5000 electors per councillor to ensure both effective democratic representation for all parts of the area, and also effective governance and decision-making arrangements which will balance the unique needs of the area in line with the Local Government Boundary Commission for England guidance.

Comparison of other large rural Unitary Authorities:

In North Yorkshire (the largest in England by area (8,053 km²)) the average number of electors per councillor was 5,374 when formed in 2023. Cornwall had a ratio of 4,994 registered electors per councilor.

Cumberland, another new unitary has a ratio of 4,569 registered electors per councillor. In general terms County Councils have higher levels of electors per Councillor. The average number of registered electorate per councillor for County Councils and Unitary Authorities in 2023 was 4,852. Locally Devon County Council in 2023 had 10,432 electors per Councillor.

We believe that in line with the above a total of 230 to 250 Cllrs would improve the democratic representation by over 50% (compared to the existing Devon County Council figures) and allow councillors to continue to undertake effective decision making, scrutinise decisions and provide effective community leadership.

Based on the number of electors on the two new Unitary Councils these would be split as follows (with Plymouth remaining at 57):

	Electors per Councillor	
	4,500	5,000
Exeter and Northern Devon	120	108
Southern Devon	73	65

Table 2: Electors per councillor

We are mindful that both proposed authorities include large rural areas that are characterised by dispersed populations. We will therefore continue to refine this analysis to ensure that benchmarks for the geographical area being served are also considered, including drawing on the recent practical experience of Westmorland and Furness Council. This may lead to a further reduction in the number of electors per councillor. We also anticipate a strengthened role for parish and town councils in maintaining local democracy and addressing the specific needs of their communities.

e) include early views on how new structures will support devolution ambitions.

The proposal for two new unitary authorities alongside the retention of Plymouth City Council on its existing boundaries, directly supports the Government's wider devolution ambitions. The existing eight district, one county (Devon) and one unitary (Torbay) councils would form into the two new authorities providing local representation, accountability and an effective service delivery platform for the future 'strategic' mayoral combined authority.

The Devon and Torbay Combined County Authority (CCA) was formally established on the 5th February as part of devolution deal for the area. The two proposed unitary authorities align to the same geography and can therefore work seamlessly to support the CCA.

Looking forward, our preference is for a Mayoral Combined Authority serving the wider peninsular area including Plymouth and Cornwall. The proposed structure of unitary councils would again nest neatly within this wider geography with the MCA including voting representation from the four authorities. This would bring more equal voting representation per head of population than single large unitary with both of the proposed unitary authorities having a population that is more akin to the population current served by Cornwall Council (at circa 570,000 people).

f) include a summary of local engagement that has been undertaken and any views expressed, along with your further plans for wide local engagement to help shape your developing proposals.

Following the publication of the English Devolution White Paper on 16th December 2024 and the subsequent receipt of the invitation to develop proposals for local government reorganisation on 5th February 2025, Leaders and Chief Executives across Devon have been in discussion about potential proposals.

We need to work across all existing local authorities across Devon to gather all the necessary information in order to prepare an options appraisal for all councils to consider ahead of the deadline for the submission of final proposals at the end of November 2025.

We are committed to engaging extensively with our residents, partners and stakeholders. The limited time available to prepare this interim plan has necessarily meant that this engagement has not been able to be as extensive as we would all prefer. Nonetheless the following activity has been undertaken;

- Online engagement events with Parish and Town Councils
- Engagement with Members of Parliament
- Reports to local strategic partnerships
- Torbay has facilitated a discussion with the Place Leadership Board together with holding an in person engagement event

Once feedback is received from Government on the interim plans submitted by the Devon local authorities, a cohesive approach to engagement across the whole of Devon will need to be determined and implemented. This will enable us to show how the councils in Devon have sought to work together in coming to a view that meets local needs and is informed by local views. We anticipate that this will include structured engagement with the following partners and stakeholders;

- Members of Parliament
- Town and Parish Councils
- Town Mayors and Clerks
- Education
- Integrated Care Board
- Police and Crime Commissioner
- Fire and Rescue Service
- Dartmoor and Exmoor National Park Authorities
- Voluntary and Community Sector

g) set out indicative costs of preparing proposals and standing up an implementation team as well as any arrangements proposed to coordinate potential capacity funding across the area.

We are mindful of the likely costs of developing proposals fully in order to give the Minister confidence in the comprehensive nature of our plan when it is submitted in November. This is one of the many benefits of working in collaboration with 8 of the 11

councils in the Devon system; costs and resources can be shared, and collaboration maximised, for the benefit of our residents. While we have scoped the legal and procedural requirements and recognise the potential cost of proposal preparation as being in the order of £250-300k, equally as important will be the practicalities of aligning public engagement and consultation over the summer months.

The county council has identified a range of option proposals it is considering, and this proposals is referenced within their intended 'interim' submission. There is the potential that their 'holding' position may well be resolved once the elections have taken place, potentially bringing the numbers to 9 of the 11 councils in support and working together in the common interest. We remain hopeful that, following the March interim submissions, other single-authority concepts might be steered onto a path of joint working through formal or informal channels. We recognise the availability of capacity funding from government might be a way to encourage this. Nevertheless, we will wish to coordinate our intended public engagement such that, if there are to be competing propositions being worked on through to November, then the public consultation and engagement on these are coordinated as best we can in order to maximise credibility with our residents, business and other key partners.

Clearly, once we move to the implementation phase, an appropriate form of governance, oversight and project delivery will be initiated, potentially using an expanded 'Team Devon' board as a sponsoring entity, but decisions on this will be made at the appropriate time. The Devon system of local government has a long history of working together and across administrative borders; productive discussions have taken place across all 11 council leaders, and we are confident that such discussions will continue in the spirit of positivity, even to the pursuance of different ends, should the remaining outlying proposals continue beyond this 'interim' stage.

- h) set out any voluntary arrangements that have been agreed to keep all councils involved in discussions as this work moves forward and to help balance the decisions needed now to maintain service delivery and ensure value for money for council taxpayers, with those key decisions that will affect the future success of any new councils in the area.**

There is a long history of local partners working together proactively and collaboratively. This spans a wide range of activity from community safety to joint planning and formal shared service delivery. We fully expect future arrangements to adopt this same ethos.

Of particular note are the following voluntary arrangements;

- Team Devon – this brings together the Leaders and Chief Executives from the eight Districts and the County Council. It provides a forum for sharing information and for discussing key proposals, not least in relation to local

government reorganisation. This grouping is also in the process of being constituted as a formal joint committee to support the operation of the Combined County Authority.

- Devon Districts Forum – the brings together the Leaders and Chief Executives of the eight Districts alongside the Devon Association of Local Councils. This has enabled the sharing of ideas and perspectives alongside the joint commissioning of initial financial analysis.

Depending upon feedback to initial Interim Plans, we would anticipate a single grouping including representation from Plymouth City and Torbay Councils alongside the County Council and District Councils would provide oversight of the development of final proposals through to November 2025. Whilst we cannot guarantee that this would necessarily mean that all partners necessarily align behind a single preferred option, it would nonetheless ensure that all proposals are explored consistently including utilising the same data sets.

6. Conclusion and next steps

We have moved at pace to develop and agree this Interim Plan submission. Using the keystones of the 500k population size and existing administrative areas as building blocks together with the benefit of the initial financial analysis, we believe that the two unitary proposal enables a balanced approach and provides the best fit with the objectives of the Devolution White Paper whilst retaining a place-based and locally distinctive approach.

We recognise that considerable further analysis is required to test and develop these proposals through to November of this year. This is particularly important in the context of a large and complex area such as Devon. We are mindful of the need to remain agile and open to different ideas in order to ensure the best possible local government arrangements are put in place. We are committed to working proactively and collaboratively in order to progress this.

Our headline programme going forward is as follows;

Project Timeline: March 2025 - November 2025

Project Goal: Develop and deliver comprehensive, evidence-based proposals for local government reorganisation in Devon, ensuring they are financially sustainable, operationally efficient, and aligned with the needs of residents and stakeholders.

Phase 1: Interim Plan Development & Foundation (March - May 2025)

- **Objective:** Establish project governance, define scope and establish key areas of focus.
- **Activities:**
 - **1.1 Project Setup:**
 - Establish project steering group and working groups, allowing for outcome of Devon County Council elections.
 - Define roles and responsibilities.
 - Set up project communication channels.
 - **1.2 Initial Stakeholder Mapping:**
 - Identify key stakeholders (residents, businesses, community groups, existing councils, etc.).
 - Begin initial contact and gather preliminary viewpoints.
 - **1.3 Interim Plan Development:**
 - Conduct initial research and evidence gathering
 - Develop assessment criteria (e.g., financial sustainability, service delivery, democratic accountability).
 - Consider wider alignment of wider public service delivery e.g. police, fire & rescue
 - **Deliverables:**
 - Project Charter.
 - Stakeholder mapping document.

Phase 2: Testing and Development (May - June 2025)

- **Objective:** Conduct rigorous testing, and refine proposals based on analysis.
- **Activities:**
 - **2.1 Financial Modelling:**
 - Develop financial models to assess the costs and benefits
 - Analyse potential impacts on council tax and other revenue streams.
 - Model long term savings and costs.
 - **2.2 Service Delivery Impact Assessment:**

- Assess the potential impact on key service areas (e.g., social care, education, waste management).
- Identify potential service delivery improvements and efficiencies.
- Consider scale of deliver and what works best, some large scale some very local services
- Consider place-based approach and role of area offices/committees
- **2.3 Legal and Governance Analysis:**
 - Assess the legal and governance implications including Councillor representation and role of parish and town councils
 - Identify any legislative changes required.
- **2.4 Initial Public Consultation and Stakeholder Engagement:**
 - Present the initial options to the public via online platforms and public meetings.
 - Undertake targeted engagement with key stakeholder groups
 - Gather feedback on proposals
- **Deliverables:**
 - Detailed reorganisation option document.
 - Financial models and reports.
 - Service delivery impact assessments.
 - Legal and Governance analysis documentation.
 - Public consultation and stakeholder engagement report (Phase 1).

Phase 3: Refinement & Stakeholder Engagement (July - September 2025)

- **Objective:** Refine reorganisation proposals based on analysis and stakeholder feedback, and conduct extensive stakeholder engagement.
- **Activities:**
 - **3.1 Option Refinement:**
 - Refine option based on financial modelling, service delivery impact assessments, and public feedback.
 - Develop detailed implementation plan.

- **3.2 Enhanced Financial Modelling:**
 - Refine financial models with data gathered from public consultations and option adjustments.
 - Stress test financial models.
- **3.3 Targeted Stakeholder Engagement:**
 - Conduct targeted engagement with specific stakeholder groups (e.g., businesses, community groups, voluntary sector).
 - Organise workshops and focus groups.
- **3.4 Second Phase of Public Consultation (Phase 2):**
 - Present the refined option to the public.
 - Provide detailed information on the potential impacts
 - Conduct online surveys and public meetings.
- **3.5 Risk Assessment:**
 - Conduct a full risk assessment.
 - Create risk mitigation plans.
- **Deliverables:**
 - Refined reorganisation option documents.
 - Updated financial models and reports.
 - Stakeholder engagement reports.
 - Public consultation report (Phase 2).
 - Risk assessment document.

Phase 4: Final Proposal & Reporting (October - November 2025)

- **Objective:** Finalise reorganisation proposals, prepare comprehensive reports, and present to decision-makers.
- **Activities:**
 - **4.1 Final Proposal Development:**
 - Develop a final reorganisation proposal based on analysis and stakeholder feedback.
 - Develop five case outline business case

- Prepare a detailed implementation plan.
- **4.2 Final Financial Report:**
 - Produce a final financial report detailing the predicted costs and benefits.
- **4.3 Final Report Preparation:**
 - Prepare a comprehensive report summarising the reorganisation proposals, analysis, and stakeholder feedback.
 - Include a clear explanation of the chosen option and its rationale.
- **4.4 Presentation to Decision-Makers:**
 - Present the final proposals to the relevant decision-making bodies
 - Address any questions and concerns.
- **4.5 Publication of Final Report:**
 - Publish the final report and reorganisation proposals for public access.
 - Submission to Minister of State by 28th November
- **Deliverables:**
 - Final reorganisation proposal document
 - Final financial report.
 - Comprehensive final report including outline business case.
 - Presentation materials.