

County Council
Thursday, 20th March, 2025



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DEVON COUNTY COUNCIL

To: Members of Devon County Council

County Hall
Exeter
EX2 4QD

12 March 2025

Your attendance is requested at the Meeting of the Devon County Council to be held at County Hall, Exeter on Thursday, 20th March, 2025 at 2.00 pm.

A handwritten signature in purple ink, consisting of a large, stylized initial 'D' followed by a series of loops and a long horizontal stroke.

Chief Executive

AGENDA

1. Apologies for Absence

2. Declarations of Interest

Members of the Council will declare any interests they may have in any item to be considered at this meeting, prior to any discussion taking place on that item.

The other registrable interests of Councillors of Devon County Council, arising from membership of City, Town or Parish Councils and other Local Authorities will automatically be recorded in the minutes.

For details of District and or Town and Parish Twin Hatters – please see here [County councillors who are also district, borough, city, parish or town councillors](#)

3. Announcements

4. Items Requiring Urgent Attention

5. Public Participation: Petitions, Questions and Representations

Petitions, Questions or Representations from Members of the public in line with the Council's Petitions and Public Participation Schemes.

6. Questions from Members of the Council

Answers to questions from Members of the Council pursuant to Standing Order 17 noting that Standing Order 17(2) highlights the requirement for questions to be related to the matter being discussed at the meeting.

7. Local Government Reorganisation Interim Plan (Pages 1 - 68)

The Council is asked to receive and consider a Report of the Chief Executive regarding the Local Government Reorganisation Interim Plan.

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CEX/25/2
20 March 2025

Local Government Reorganisation Interim Plan

Report of the Chief Executive

Please note that the following recommendations are subject to consideration and determination by the Cabinet (and confirmation under the provisions of the Council's Constitution) before taking effect.

1 Recommendations

That Council:

- a) Notes the approach taken to develop a response to the Government's invitation to submit an Interim Plan on Local Government Reorganisation in Devon;
- b) Supports the Leader to submit the Interim Plan by 21 March 2025.

2 Introduction

- 2.1 Government launched the English Devolution White Paper in December 2024. This set out the Government's intentions to move to unitary authority structures in remaining two-tier areas in England, such as Devon, alongside its approach to widening and deepening devolution. This was followed by a Statutory Invitation from the Minister of State for Local Government and English Devolution to all 21 two-tier council areas to submit proposals for a single tier of local government. In Devon, the invitation was sent to all 11 Councils – the County Council, the 8 District Councils, Torbay Council and Plymouth City Council.
- 2.2 The Statutory Invitation included a timeline and a request for an Interim Plan by 21 March and a requirement to submit a full proposal by 28 November 2025. Included in the invitation was guidance from the Secretary of State for unitary government proposals framed under 6 criteria. For Interim Plans, 8 areas were identified. Attached in Appendix 1 to this report is a copy of the Statutory Invitation where the full details of the guidance can be found. In summary the criteria for the Full Proposal are:
 1. Proposals should seek to achieve for the whole area a single tier of local government and be sensible economic areas with appropriate tax base and not create undue disadvantage for one part of the area.
 2. Unitary local government must be of the right size to achieve efficiencies and withstand financial shocks and as a guiding principle new councils should aim for a population of 500,000 or more.
 3. Unitary structures must prioritise the delivery of high quality and sustainable public services, showing opportunities for service reform and impacts on crucial services such as social care, SEND and homelessness.

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4. Show how Councils have worked together to come to a view that is informed by local views and consider local identity and cultural and historic importance.
5. Must support devolution arrangements and ensure sensible population size ratios between local authorities any Strategic Authority.
6. Enable stronger community engagement and deliver genuine neighbourhood empowerment

2.3 In addition to the above criteria the guidance sets out two further areas to take into account for Full Proposals:

a) Boundary Changes

- that existing district areas should be considered the building blocks of proposals and
- any proposals involving boundary changes need a strong rationale and justification as to why this supports strong services and financial sustainability due to likely additional costs and complexities of implementation.

b) Engagement and Consultation

- Collaborate and share data acting in best interest of whole area
- Engagement with MPs, workforce, local partners, residents and businesses
- Inform and develop common understanding of improvements
- Key public sector engagement – ICB, Police, Fire, Higher and Further Education, National Parks and VCSE sector.

2.4 In support of the Statutory Invitation a series of Webinars have been led by senior officials from the Ministry of Housing, Communities and Local Government (MHCLG) offering opportunities for questions and providing clarifications on expectations. These have been offered nationally to two-tier areas, and small neighbouring unitary councils and specific sessions have been run for the 11 Devon local authorities. These events have been supplemented by sessions run by the County Council Network (CCN) and the Association of County Chief Executives (ACCE).

2.5 Some significant additional details have been shared during these sessions, which provided a different emphasis and status of the Interim Plan stage of proposals for a single tier of local government. Whilst the original guidance sought a single interim plan from each area, and required firm initial proposals covering the 8 points in the guidance, the webinars indicated that Interim Plans can be submitted by any local authority invited to respond where there is no consensus on a single solution, and importantly that the Interim Plans are not a decision point and can set out initial work and approaches rather than defined solutions. It has been recognised that areas will all be at different stages of thinking and development, with some able to come forward with clear and single proposals where they have been working on such propositions for several years, and others are at a very early stage of consideration.

2.6 The Council Leader has written to the Minister requesting clarification on this additional advice in a formal response to support the submission of an Interim Plan from the Council (Appendix 2a). A response to this letter is shared in Appendix 2b to this report, and confirms the following:

- Interim Plans are not final proposals and are therefore not a decision point.
 - For practical reasons it is acceptable for a local authority to submit an individual interim plan where there is no consensus across the whole area.
 - It is acceptable to not indicate a preferred option at the Interim Plan stage.
 - It is understood that no local decision has been taken on a final proposal.
 - No expectation for a formal consultation to have been undertaken at this stage.
 - Confirmed capacity funding is available to aid development of proposals.
 - Confirmed there is no weighting to the criteria only a requirement to show how options meet the criteria in the round.
- 2.7 In liaison with political group leaders, Cabinet has adopted an inclusive, participatory approach to evidence gathering and assessment on local government reorganisation (LGR). The purpose of this report is to help facilitate a cross-party debate on the information available to date.

3 Case for change

- 3.1 Devon County Council and its Local Government partner Councils in Devon are ambitious to work together to make a greater difference to the lives of our residents in Devon. In our discussions relating to LGR and our Business-as-Usual activities there is a clear commitment to creating a culture of improvement and addressing barriers for our residents in accessing high quality services. Across Devon, we have one county council, eight district councils, and two unitary authorities. This fragmented system is confusing for residents. Running 11 separate councils, each with its own management team, back-office functions, and contracting arrangements, results in duplication. Residents and businesses face multiple access points for services, different policies in different areas, and a lack of clear accountability. Reforming local government is essential to improve capacity and resilience, remove inefficiencies, and deliver public services that are easier to access and more responsive to local needs.
- 3.2 A pattern of unitary local government would bring much-needed clarity, ensuring that decisions on vital issues—such as housing, transport, and social care—are made in a more strategic and joined-up way. Residents and businesses would no longer need to navigate multiple councils to get things done, making it simpler to access support and influence decisions. A reformed system would also enable more effective collaboration with public sector partners, such as the NHS, parish and town councils, and police, allowing services to be better integrated and more focused on the most vulnerable citizens and meet the needs of local communities.

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- 3.3 Devon's neighbours have already modernised their local government structures. Somerset, Cornwall, and Dorset have moved to unitary models, creating simpler, governance. The case for reform is also driven by the Government's broader devolution agenda. Ministers have made it clear that areas seeking greater local powers and investment must demonstrate simpler and stronger governance. A move to a unitary authority structure would put Devon as part of a Mayoral Strategic Authority in a stronger position to attract funding and decision-making powers from Whitehall, ensuring the county has more control over its own future, gain greater influence over economic development, infrastructure investment, and drive public service reform.
- 3.4 This is a once-in-a-generation opportunity to create a more effective, efficient, and financially resilient system of local government. A unitary model would eliminate unnecessary bureaucracy, streamline democratic accountability, and enhance leadership for the county. Most importantly, it would ensure Devon has enhanced capability to meet the challenges of the future, delivering high-quality public services and driving economic growth in a way that benefits all residents.

4 Interim Plan

- 4.1 The proposed Interim Plan from the Council in response to the Statutory Invitation is attached in Appendix 3. The approach taken in developing this has been to engage with local partners, Elected Members, staff and key stakeholders. The plan sets out our work done and the further analysis and steps we would consider undertaking to develop a Full Proposal. The timescales to produce an Interim Plan over a matter of 6 weeks has not been sufficient time, from a standing start, for the Council to undertake detailed and robust analysis and evidence gathering to underpin a proposal for a single tier of local government across Devon. The Council, based on the response from the Minister will not be disadvantaged by taking this approach.
- 4.2 One of the Council's core operating principles is to be evidence-led. The Council has engaged through the CCN a number of supporting studies and analyses. These studies are work in progress and have not been available within the timescale set to support the Interim Plan. However, this work will help inform the next stages of development for the Full Proposal:
- a) Pixel Funding Disaggregation Model – this is an independently developed Pixel Financial Management funding disaggregation model, built on nationally available data. This is an excel-based model for CCN councils and local partners that allows councils to disaggregate 2025/26 funding streams to district level, and then reaggregate to potential new unitary formations, including existing unitary authorities potentially involved in the LGR process. It provides an indication of combined funding sources across the 11 local authorities.
 - b) Newton Europe – an analysis of people-based services, costs and impacts at a local level covering adult and children's social care, education, homelessness and public health, which can support building a position at different geographical levels of these impacts.

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- 4.3 A number of engagement meetings have been held with Leaders and Chief Executives across Devon, and with Plymouth and Torbay Councils. Team Devon S151 Officers and Chief Executives have met and agreed to share financial data and where possible reach a common basis and sets of data for finance covering grant income, other funding, taxation, debt, reserves, forecast spend and medium financial planning strategies. The scope and outcome from this commitment will inform the next stages of developing proposals.
- 4.4 Local Government Reorganisation to a single tier of local government is a significant change for the Council. Full and robust analysis to develop optimum solutions that can satisfy Government's criteria and deliver quality services to residents and businesses, will be a matter for the next County Council's administration, following elections on 1 May 2025. To date the Council has considered five options with a baseline scenario as a starting position which include options that other local authority partners are considering and are likely to be submitted in their Interim Plans. These options have supported a number of conversations with elected members, staff and stakeholders to help raise considerations for the development of Full Proposals by 28 November. These options are set out in the Interim Plan in Appendix 3.
- 4.5 Other options may come forward for consideration following the County Council elections and following feedback from Government on interim plans submitted by the 11 local authority councils. There may also be further clarification of the guidance, particularly on boundaries and timescales.
- 4.6 On 25 February 2025, a workshop, supported by all political group leaders was held for all Elected Members of Devon County Council. This gave all councillors an opportunity to consider the information available to date and to identify any questions they would want to be answered and the key issues they expected to be addressed in the development of interim and/or final proposals.
- 4.7 In addition to this political group leaders have met weekly with the cross-party governance working group to consider the current governance structures and electoral participation across the area and identify the key issues in this area. To date the focus is on guiding principles and identifying key issues, rather than seeking preferences. It will therefore be used in the development of final submissions alongside wider engagement.
- 4.8 Online staff briefings have been held for all staff following the letter dated 5 February 2025 and Government announcement. Each Directorate has also held a further detailed briefing, and an extended leadership team session has taken place to consider the benefits of moving to a single tier of local government from their service perspectives and the approach to developing the Interim Plan.

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4.9 A series of face to face and online meetings have been held with local authority partners and stakeholders. Regular meetings between the Chief Executives and Leaders with Plymouth and Torbay and District Councils have taken place, including bringing together S151 officers. Informal conversations with the following stakeholders have also been undertaken:

- Devon MPs – Steve Race MP, David Reed MP, Martin Wrigley MP, Sir Geoffrey Cox MP, Rebecca Smith MP, Caroline Voaden MP, Ian Roome MP and Mel Stride MP Senior Researcher
- Earl of Devon
- Businesses – Confederation of British Industry, Federation of Small Business, Devon, Plymouth and Exeter Chamber of Commerce
- Devon Association of Local Councils (DALC)
- Dartmoor and Exmoor National Parks
- Devon and Cornwall Police and Crime Commissioner
- Higher Education – Exeter University
- NHS System Leaders

The ICB has agreed to meet with Team Devon Leaders in May 2025.

4.10 An Engagement Plan will be developed as part of the next stage in support of submitting a Full Proposal and include engagement with the public, workforce and trade unions, and other local partners.

4.11 Other key areas of focus and next steps set out in the Interim Plan include:

- The additional evidence, analysis and assessment in support of a fuller options appraisal covering finances, impacts on services, public sector service reforms and potential efficiencies
- Co-design work with DALC and National Parks to develop thinking around community and neighbourhood empowerment, models for substructures, devolution of services and funding and consideration of local identities.
- Further consideration of Elected Member representation, including numbers and ratios of members to electorate.
- Members of the next council considering the line of sight from the resident or service users into the Unitary Councils with a focus on unitary structures.

5 Strategic Plan

5.1 This report sets out the Council's response to Government's statutory invitation to submit an interim plan on proposals for a single tier of local government. The focus of the Council's Interim Plan is on getting this right for Devon, taking an evidence-based approach to assessing the best options that can provide financially resilient services, and therefore the recommendations in this report support all the priorities in the Council's Strategic Plan.

6 Financial Considerations

- 6.1 There are no financial considerations from the recommendations in this report. Full consideration of financial implications and impacts will be considered at the Full Proposal stage.
- 6.2 The Statutory Invitation indicated that capacity funding would be made available for each area to develop their proposals. Currently there is no update on the amount or timing of such financial support. The Interim Plan does indicate the areas of support and help that will be needed to complete the Full Proposal stage and the anticipated areas we will seek financial assistance with.
- 6.3 It is also appropriate to note at this stage that the Statutory Invitation also indicated that proposals should set out how an area will manage transition costs, including planning for future service transformation opportunities from existing budgets, including the flexible use of capital receipts. It also clarified the government's position that there is no proposal for council debt to be addressed centrally or written off as part of reorganisation.
- 6.4 Indicative implementation costs and efficiencies will be developed as part of the Full Proposal.

7 Legal Considerations

- 7.1 There are no legal considerations from the recommendations in this report. Full consideration of the legal impacts will be considered at the Full Proposal stage.
- 7.2 The Secretary of State for Housing, Communities and Local Government has exercised her powers under Part 1 of the Local Government and Public Involvement in Health Act 2007, which enables her to invite any principal authority in the area (as indicated by the letter received on 5th February 2025) to submit proposal for a single tier of local government.
- 7.3 Devon County Council will be providing an update on the progress made to date on LRG proposal (s) in the form of an interim plan on 21 March 2025 and providing proposal(s) in November 2025.
- 7.4 The Monitoring Officer has reviewed this report, and, in her view, it is a fair and reasonable explanation of the current position and analysis as we understand it today.
- 7.5 Legal input will be critical to the longer-term process and procedures that will be required to arrive at, and support, the LGR proposal (s) to be submitted to Government in November 2025 and the delivery of the outcome.

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- 7.6 The Monitoring Officer has confirmed that no proposal is being submitted on 21 March 2025, only an indication of the work completed to date in the interim plan. In line with our constitution the submission of an LRG proposal is an executive decision which will be taken at a later date. However, at this stage, as a matter of such significance and taking into account the election cycle of Devon County Council, it is important that the Council considers the interim plan and the work to date.

8 Environmental Impact Considerations (Including Climate Change, Sustainability and Socio-economic)

- 8.1 There are no environmental considerations from the recommendations in this report. Full consideration of the environmental implications and impacts will be considered at the Full Proposal stage.

9 Equality Considerations

- 9.1 There is no equality consideration from the recommendations in this report. Full consideration of the equality impacts will be set out in an Equality Assessment at the time of considering the Full Proposal.

10 Risk Management Considerations

- 10.1 There is a risk in submitting the Interim Plan that sets out our current work and not a solution at this stage could disadvantage the Council. The reassurance from the Minister on this point mitigates against this risk, and arguably there is greater risk of developing firmer propositions without due regard to detailed evidence and impacts.
- 10.2 There is currently no consensus from across the 11 local authority partners and this is resulting in several Interim Plan submissions being put forward from the area. This is not the approach that Government was seeking in their Statutory Invitation, although further clarification from the Minister has provided for this approach. Compared to elsewhere Devon may appear complex and the feedback received on all the Interim Plans may be less favourable than other locations.

11 Conclusions

11.1 Government has set out a clear position to move to single unitary structure arrangements in all remaining two-tier areas within England, including small neighbouring unitary councils. Given the timescale and pace that the Council and its local authority partners have been asked to work within to develop proposals, there has not been time to arrive at a set of clear options backed by an evidenced option appraisal. With County Council elections taking place in May, it is also not appropriate for the outgoing Administration to commit the new Administration to a particular view, especially when the engagement and analysis required to complete the task set out by the UK Government has not been completed. Submitting an Interim Plan by 21st March deadline that shows the Council's current work is therefore the best approach. The Minister's reassurance (see Appendix 3) and recognition of the Council's position is helpful in confirming that the Council will not be placed at a disadvantage by taking this approach. The Interim Plan shows the areas for next steps and consideration including formal engagement with residents and stakeholders and the additional analysis and assessment needed to develop a Full Plan that can best serve Devon residents and businesses.

Donna Manson

Chief Executive

Electoral Divisions: All

Leader and Cabinet Member for Policy, Corporate and Asset Management:
Councillor James McInnes

Local Government Act 1972: List of background papers

Nil

Contact for enquiries:

Name: Keri Denton

Telephone: 01392 380364

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APPENDIX 1 – STATUTORY INVITATION AND GUIDANCE

APPENDIX 2a – LEADER TO MINISTER DATED 25TH FEBRUARY 2025

APPENDIX 2b – REPLY FROM MINISTER DATED 13TH MARCH 2025

APPENDIX 3 – INTERIM PLAN



Ministry of Housing,
Communities &
Local Government

Jim McMahon OBE MP

*Minister of State for Local Government and
English Devolution*
2 Marsham Street
London
SW1P 4DF

Your reference:

Our reference:

To: Leaders of two-tier councils and
unitary councils in Devon

Devon County Council
East Devon District Council
Exeter City Council
Mid Devon District Council
North Devon District Council
South Hams District Council
Teignbridge District Council
Torridge District Council
West Devon Borough Council
Plymouth City Council
Torbay Council

5 February 2025

Dear Leaders

This Government has been clear on our vision for simpler, more sustainable, local government structures, alongside a transfer of power out of Westminster through devolution. We know that councils of all political stripes are in crisis after a decade of decline and instability. Indeed, a record number of councils asked the government for support this year to help them set their budgets.

This new government will not waste this opportunity to build empowered, simplified, resilient and sustainable local government for your area that will increase value for money for council taxpayers. Local leaders are central to our mission to deliver change for hard-working people in every corner of the country through our Plan for Change, and our councils are doing everything they can to stay afloat and provide for their communities day in, day out. The Government will work closely with you to deliver these aims to the most ambitious timeline.

I am writing to you now to formally invite you to work with other council leaders in your area to develop a proposal for local government reorganisation, and to set out further detail on the criteria, guidance for the development of proposals, and the timeline for this process. A formal invitation with guidance for the development of your proposals is attached at Annex A. This invitation sets out the criteria against which proposals will be assessed.

Developing proposals for reorganisation

We expect there to be different views on the best structures for an area, and indeed there may be merits to a variety of approaches. Nevertheless, it is not in council taxpayers' interest to devote public funds and your valuable time and effort into the development of multiple proposals which unnecessarily fragment services, compete against one another, require lengthy implementation periods or which do not sufficiently address local interests and identities.

The public will rightly expect us to deliver on our shared responsibility to design and implement the best local government structures for efficient and high-quality public service delivery. We therefore expect local leaders to work collaboratively and proactively, including by sharing information, to develop robust and sustainable unitary proposals that are in the best interests of the whole area to which this invitation is issued, rather than developing competing proposals.

This will mean making every effort to work together to develop and jointly submit one proposal for unitary local government across the whole of your area. The proposal that is developed for the whole of your area may be for one or more new unitary councils and should be complementary to devolution plans. It is open to you to explore options with neighbouring councils in addition to those included in this invitation, particularly where this helps those councils to address concerns about their sustainability or limitations arising from their size or boundaries or where you are working together across a wider geography within a strategic authority.

I understand there will be some cases when it is not possible for all councils in an area to jointly develop and submit a proposal, despite their best efforts. This will not be a barrier to progress, and the Government will consider any suitable proposals submitted by the relevant local authorities.

Supporting places through change

It is essential that councils continue to deliver their business-as-usual services and duties, which remain unchanged until reorganisation is complete. This includes progress towards the Government's ambition of universal coverage of up-to-date local plans as quickly as possible. To support with capacity, I intend to provide some funds for preparing to take forward any proposal, and I will share further information later in the process.

Considering the efficiencies that are possible through reorganisation, we expect that areas will be able to meet transition costs over time from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects.

The default position is that assets and liabilities remain locally managed by councils, but we acknowledge that there are exceptional circumstances where there has been failure linked to capital practices. Where that is the case, proposals should reflect the extent to which the implications of this can be managed locally, including as part of efficiencies possible through reorganisation, and Commissioners should be engaged in these discussions. We will continue to discuss the approach that is proposed with the area.

I welcome the partnership approach that is being taken across the sector to respond to the ambitious plans set out in the White Paper. My department will continue to work closely with the Local Government Association (LGA), the District Councils Network, the County Councils Network and other local government partners to plan how best to support councils through this process. We envisage that practical support will be needed to understand and address the key thematic issues that will arise through reorganisation, including managing service impacts and opportunities for the workforce, digital and IT systems, and leadership support.

Timelines and next steps for interim plans and full proposals

We ask for an interim plan to be submitted on or before 21 March 2025, in line with the guidance set out in the attached Annex. My officials will provide feedback on your plan to help support you to develop final proposals.

I will expect any full proposal to be submitted **by 28 November**. If I decide to implement any proposal, and the necessary legislation is agreed by Parliament, we will work with you to move to elections to new 'shadow' unitary councils as soon as possible as is the usual arrangement in the process of local government reorganisation.

Following submission, I will consider any and all proposals carefully before taking decisions on how to proceed. My officials are available throughout to discuss how your reorganisation and devolution aspirations might work together and what support you think you might need to proceed.

This is a once in a generation opportunity to work together to put local government in your area on a more sustainable footing, creating simpler structures for your area that will deliver the services that local people and businesses need and deserve. As set out in the White Paper, my commitment is that clear leadership locally will be met with an active partner nationally.

I am copying this letter to council Chief Executives. I am also copying this letter to local Members of Parliament and to the Police and Crime Commissioner.

Yours sincerely,



JIM MCMAHON OBE MP

Minister of State for Local Government and English Devolution

LOCAL GOVERNMENT AND PUBLIC INVOLVEMENT IN HEALTH ACT 2007

INVITATION FOR PROPOSALS FOR A SINGLE TIER OF LOCAL GOVERNMENT

The Secretary of State for Housing, Communities and Local Government, in exercise of his powers under Part 1 of the Local Government and Public Involvement in Health Act 2007 ('the 2007 Act'), hereby invites any principal authority in the area of the county of Devon, to submit a proposal for a single tier of local government.

This may be one of the following types of proposal as set out in the 2007 Act:

- Type A – a single tier of local authority covering the whole of the county concerned
- Type B – a single tier of local authority covering an area that is currently a district, or two or more districts
- Type C – a single tier of local authority covering the whole of the county concerned, or one or more districts in the county; and one or more relevant adjoining areas
- Combined proposal – a proposal that consists of two or more Type B proposals, two or more Type C proposals, or one or more Type B proposals and one or more Type C proposals.

Proposals must be submitted in accordance with paragraphs 1 to 3:

1. Any proposal must be made by **28 November 2025**.
2. In responding to this invitation an authority must have regard to the guidance from the Secretary of State set out in the Schedule to this invitation, and to any further guidance on responding to this invitation received from the Secretary of State.
3. An authority responding to this invitation may either make its own proposal or make a proposal jointly with any of the other authorities invited to respond.

Signed on behalf of the Secretary of State for Housing, Communities and Local Government.



F KIRWAN

A senior civil servant in the Ministry of Housing, Communities and Local Government

5 February 2025

SCHEDULE

Guidance from the Secretary of State for proposals for unitary local government.

Criteria for unitary local government

- 1. A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government.**
 - a) Proposals should be for sensible economic areas, with an appropriate tax base which does not create an undue advantage or disadvantage for one part of the area.
 - b) Proposals should be for a sensible geography which will help to increase housing supply and meet local needs.
 - c) Proposals should be supported by robust evidence and analysis and include an explanation of the outcomes it is expected to achieve, including evidence of estimated costs/benefits and local engagement.
 - d) Proposals should describe clearly the single tier local government structures it is putting forward for the whole of the area, and explain how, if implemented, these are expected to achieve the outcomes described.

- 2. Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks.**
 - a) As a guiding principle, new councils should aim for a population of 500,000 or more.
 - b) There may be certain scenarios in which this 500,000 figure does not make sense for an area, including on devolution, and this rationale should be set out in a proposal.
 - c) Efficiencies should be identified to help improve councils' finances and make sure that council taxpayers are getting the best possible value for their money.
 - d) Proposals should set out how an area will seek to manage transition costs, including planning for future service transformation opportunities from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects.
 - e) For areas covering councils that are in Best Value intervention and/or in receipt of Exceptional Financial Support, proposals must additionally demonstrate how reorganisation may contribute to putting local government in the area as a whole on a firmer footing and what area-specific arrangements may be necessary to make new structures viable.
 - f) In general, as with previous restructures, there is no proposal for council debt to be addressed centrally or written off as part of reorganisation. For areas where there are exceptional circumstances where there has been failure linked to capital practices, proposals should reflect the extent to which the implications of this can be managed locally, including as part of efficiencies possible through reorganisation.

3. Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens.

- a) Proposals should show how new structures will improve local government and service delivery, and should avoid unnecessary fragmentation of services.
- b) Opportunities to deliver public service reform should be identified, including where they will lead to better value for money.
- c) Consideration should be given to the impacts for crucial services such as social care, children's services, SEND and homelessness, and for wider public services including for public safety.

4. Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views.

- a) It is for councils to decide how best to engage locally in a meaningful and constructive way and this engagement activity should be evidenced in your proposal.
- b) Proposals should consider issues of local identity and cultural and historic importance.
- c) Proposals should include evidence of local engagement, an explanation of the views that have been put forward and how concerns will be addressed.

5. New unitary structures must support devolution arrangements.

- a) Proposals will need to consider and set out for areas where there is already a Combined Authority (CA) or a Combined County Authority (CCA) established or a decision has been taken by Government to work with the area to establish one, how that institution and its governance arrangements will need to change to continue to function effectively; and set out clearly (where applicable) whether this proposal is supported by the CA/CCA /Mayor.
- b) Where no CA or CCA is already established or agreed then the proposal should set out how it will help unlock devolution.
- c) Proposals should ensure there are sensible population size ratios between local authorities and any strategic authority, with timelines that work for both priorities.

6. New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.

- a) Proposals will need to explain plans to make sure that communities are engaged.
- b) Where there are already arrangements in place it should be explained how these will enable strong community engagement.

Developing proposals for unitary local government

The following matters should be taken into account in formulating a proposal:

Boundary Changes

- a) Existing district areas should be considered the building blocks for your proposals, but where there is a strong justification more complex boundary changes will be considered.
- b) There will need to be a strong public services and financial sustainability related justification for any proposals that involve boundary changes, or that affect wider public services, such as fire and rescue authorities, due to the likely additional costs and complexities of implementation.

Engagement and consultation on reorganisation

- a) We expect local leaders to work collaboratively and proactively, including by sharing information, to develop robust and sustainable unitary proposals that are in the best interests of the whole area to which this invitation is issued, rather than developing competing proposals.
- b) For those areas where Commissioners have been appointed by the Secretary of State as part of the Best Value Intervention, their input will be important in the development of robust unitary proposals.
- c) We also expect local leaders to engage their Members of Parliament, and to ensure there is wide engagement with local partners and stakeholders, residents, workforce and their representatives, and businesses on a proposal.
- d) The engagement that is undertaken should both inform the development of robust proposals and should also build a shared understanding of the improvements you expect to deliver through reorganisation.
- e) The views of other public sector providers will be crucial to understanding the best way to structure local government in your area. This will include the relevant Mayor (if you already have one), Integrated Care Board, Police (Fire) and Crime Commissioner, Fire and Rescue Authority, local Higher Education and Further Education providers, National Park Authorities, and the voluntary and third sector.
- f) Once a proposal has been submitted it will be for the Government to decide on taking a proposal forward and to consult as required by statute. This will be a completely separate process to any consultation undertaken on mayoral devolution in an area, which will be undertaken in some areas early this year, in parallel with this invitation.

Interim plans

An interim plan should be provided to Government on or before **21 March 2025**. This should set out your progress on developing proposals in line with the criteria and guidance. The level of detail that is possible at this stage may vary from place to place but the expectation is that one interim plan is jointly submitted by all councils in the area. It may be the case that the interim plan describes more than one potential proposal for your area, if there is more than one option under consideration. The interim plan should:

- a) identify any barriers or challenges where further clarity or support would be helpful.
- 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.
- c) include indicative costs and arrangements in relation to any options including planning for future service transformation opportunities.
- 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.
- e) include early views on how new structures will support devolution ambitions.
- 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.
- 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.
- 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.

Jim McMahon OBE MP
Minister of State for Local Government and
English Devolution

Sent via email:
Ministerial.correspondence@levellingup.gov.uk

Leader of the County Council

Councillor James McInnes
County Hall
Topsham Road
Exeter
EX2 4QD

Tel: 01392 383000
Email: james.mcinnnes@devon.gov.uk

25 February 2025

Dear Minister,

In response to the Local Government Reorganisation Statutory Invitation you issued on 5th February 2025 to all Councils across Devon, Plymouth and Torbay, I am seeking clarity on the approach required for submitting interim plans, and the status of these plans. We have engaged with your department representatives and attended national and local webinars where a number of significant updates have been provided, and we have raised questions. To date there has not been any formal statement in support of these updates or responses to some questions we have raised.

I am supportive of the concept of moving to a Unitary Council(s) structure where it can realise financial sustainability and improved high quality services. This however can only be achieved where there is sufficient analysis, evidence and data to support decisions, coupled with effective and formal engagement with residents and communities. We will not have received or evaluated by 21st March significant financial data, evidence and analysis, or analysis of potential impacts on people services including adult and children's social care, SEND and education.

I have set out below the key areas I would like to have greater comfort on to ensure that the County Council has all available details to make its interim plan submission. You will be aware that there are County Council elections in May, and our pre-election period starts on 25th March. To ensure good and compliant governance the outgoing administration should not commit the new administration to specific options and this is important context for the points I raise. Your assurance on the following points is therefore critical.

1. We have been informed that the interim plan is not a decision point and the County Council is required to set out its progress and current thinking not defined options, should the analysis be available. Your Government will provide feedback on the interim plan and not 'knock-back' at this stage.
2. Each Council can submit a separate interim plan when there is no overall consensus, based on the work to date, and no requirement for one submission containing several options is required.
3. In a separate interim plan from the County Council, it is accepted there is much work still to do, and we can set out the options being explored rather than specify a preferred option(s)
4. A new Council coming into effect in May can change its position and can re-engage with your department to explain its new position.

5. The time available to provide interim plans is not sufficient to have completed any meaningful or formal consultation with residents and stakeholder on ideas being considered, and as such the Council will not be placed at detriment for not having had sufficient time, or democratic mandate to develop firmer proposals.
6. Capacity funding will be made available to local authorities.
7. There is no weighting applied to the criteria set out in the Statutory Invitation
8. No template is being provided by your Department for the Interim Plan

I am meeting with Leaders across Plymouth City Council, Torbay Council and the 8 District Councils spanning Devon and am engaging with Members of Parliament, businesses, Police, the ICB, education providers, National Park Authorities and the Devon Association of Local Councils. The stage we are at means these sessions and conversations remain high level. We have committed to sharing our financial analysis and impact on People Services, once it has been received and considered.

My commitment is to develop the best solutions for all Devon residents, and I look forward to your reply and clarifications to the points above to achieve this by working across national and local government.

I would appreciate a response by 14th March in advance of the publication of our Council paper.

Yours sincerely,



Councillor James McInnes
Leader of the County Council

c.c. Will Garton, Director General for Local Government, Growth and Communities
Catherine Turner, Local Government Engagement, South West Lead



Ministry of Housing,
Communities &
Local Government

Jim McMahon OBE MP

*Minister of State for Local Government and
English Devolution*
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SW1P 4DF

Our reference: MC2025/06318

Cllr James McInnes
Leader of the County Council
County Hall
Topsham Road
Exeter
EX2 4QD

13 March 2025

Dear James,

Thank you for your email of 25 February regarding local Government reorganisation.

As you know I wrote to the leaders of all councils in Devon, Torbay and Plymouth on 5 February to invite you to work together to develop a proposal for local government reorganisation, and have requested that for 21 March councils produce an interim plan which sets out progress with this work.

Our officials met following the issue of this invitation for proposals, to discuss the next steps and process. I have responded to the questions you have raised in turn below:

Interim Plans

1. You asked if interim plans are a decision point. Interim plans are not final proposals and therefore are not a decision point. Interim plans should capture progress on developing proposals in line with the criteria and demonstrate how councils are working together. The plans serve as a check-in point to show direction and momentum. We will provide feedback on interim plans, to support further work finalising proposals but we will not rule out options at this stage as this is for councils to continue to discuss.
2. You asked if each council can submit a separate interim plan when there is no overall consensus. The expectation is that each area works together to submit one interim plan. The plan may describe more than one potential proposal for the area if there are several options under consideration by different councils, or where there is no consensus.
3. If it has not been possible for all councils in an area to hold these discussions before 21st March, it may be that for practical reasons a council decides to submit a separate interim plan. Under such a scenario, the interim plan should outline the steps necessary to establish arrangements that ensure all councils remain engaged in the discussions, ensures all councils can consider the options and allow for evidence to be provided on how these criteria are met.

4. You asked if councils can set out the options being explored, rather than specifying a preferred option(s). It is acceptable for councils to set out different options being explored at this early stage, and it will be important where possible to provide a comparison of those options against the criteria with available evidence. Interim plans do not need to indicate a preferred option at this early stage. We also recognise that each area will be at different stages of developing plans for unitary local government and therefore the level of detail will vary.
5. You asked if a new Council coming into effect in May can change its position and re-engage with the Department to explain its new position. We understand that at this point in the process, decisions being taken locally are not on the final proposals themselves, and as such the time between March and November will be spent refining proposals for the Government to formally consider, as well as engaging with the Department as these proposals evolve.
6. You asked if a lack of formal consultation will be detrimental to the development of proposals. There is no expectation for councils to formally consult on interim plans and councils should only include a summary of what local engagement has been undertaken at this early stage and any views expressed, along with your further plans for wide local engagement with local stakeholders and public service providers, to help shape your developing proposals.

Capacity funding

7. You asked if capacity funding will be made available to councils. In my previous letter to councils, I was clear that I intend to provide some funds for taking forward any proposal, and I will share further information later in the process.
8. Interim plans should set out indicative costs of implementing proposals and standing up an implementation team, so we can better understand what support councils need to implement proposals.

Weighting

9. You asked if no weighting will be applied to the criteria set out in the statutory invitation. In the letter inviting proposals for unitary local government, we have set out guidance on the criteria for proposals for unitary local government. These criteria are not weighted, and proposals will need to evidence how these criteria are met in the round, across the area.
10. It is to the area to ensure that relevant representations and evidence are considered in their final proposal. Councils should continue to follow the guidance and criteria set out in the statutory letters, published in Annex A.

Template

11. You asked if there is a template provided by the Department for interim plans. There is no template for the interim plans. It is up to local areas to decide how they wish to

present their initial thinking, and we understand that the level of detail that is possible at this stage may vary from place to place. We have not prescribed a format for submission of interim plans, as we know from our discussions that areas are at different stages of delivering proposals and this enables councils to update us in a way that takes account of local circumstances.

I remain grateful for your commitment to this process and also for the work being done locally to coordinate meetings across the area and progress with developing these proposals.

Thank you again for writing to me on this important matter.

Yours sincerely,



JIM MCMAHON OBE MP

Minister of State for Local Government and English Devolution



INTERIM PLAN

March 2025

LOCAL GOVERNMENT REORGANISATION

- GETTING IT RIGHT FOR DEVON -

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Executive Summary

The government has invited Devon's councils to explore new structures for local government and strategic arrangements for devolution. This is a once-in-a-generation opportunity to create a modern, efficient, and responsive system that delivers better services, clearer accountability, and stronger local leadership. By embracing change, Devon can build a fairer, more financially resilient local government, ensuring the county is well-prepared to meet future challenges.

Our focus is on getting this right for Devon, taking an evidence-based approach to assessing the best options, listening to all stakeholders and sharing information whilst future proofing our capacity to deliver high quality services for our residents. Financial resilience is paramount. Devon's councils face a combined budget gap of £180 million by 2028/29, reinforcing the need for reform. A new model offers the chance to eliminate duplication, simplify structures, and unlock efficiencies, ensuring resources are invested in frontline services rather than administration. Local accountability will be strengthened, with decisions made closer to communities, empowering residents to shape their future. Stronger alignment with public sector partners, including health, policing, and transport, will ensure better coordination and more joined-up services.

Over the coming months, we will conduct detailed assessments to identify the most effective model, backed by robust financial analysis and engagement with key stakeholders. We are committed to working in close partnership with district and unitary councils, MPs, public sector organisations, businesses, and local communities. Public engagement will be central, ensuring that any new structure reflects the needs and aspirations of Devon's residents.

We will co-design future local government and devolution arrangements with our partners, communities, and residents so that:

- Services are easier to access, with a single point of contact reducing confusion and bureaucracy.
- Support for our most vulnerable children is strengthened, bringing social care, education and SEND services together with housing and health services.
- Health and social care are better integrated, improving support for older people and those with complex needs.
- A unified approach to housing and planning enables the delivery of more affordable homes and sustainable development.
- Economic growth is strengthened through investment in skills, strategic job creation, and stronger business partnerships.

- Local democracy is enhanced, with clearer accountability and greater community engagement in decision-making.

This is a once-in-a-generation chance to get local government right for Devon - to enhance service delivery, improve democratic accountability, and provide stronger leadership. By embracing change, Devon can create a streamlined, effective system that makes decision-making simpler, reduces bureaucracy, and ensures local government is ready to meet the challenges of the future.

1. Introduction

1.1. Evidence based approach

Taking a decision of this importance, that will shape governance and services for future generations, requires thorough evaluation and detailed consideration. In this process, we will be guided by the evidence and data and what's best for our residents. We also want to discuss with our partners in the other Devon councils and public services how best we can design and deliver future public services that are more responsive, more efficient and better value for money for the residents of Devon. We've started this process, and it will continue over the coming months with the development of a full proposal and business case.

In this Interim Plan we set out our current position. It describes the existing model of local government, its governance, key indicators including the county's size and population, the relationship to other public services and the opportunities and key challenges ahead.

We also detail the work conducted to date and the work that will be undertaken over the coming months and how this will be done engaging and working constructively with partners.

We recognise that it is important that any future options are not purely financially driven, but that they also need to be based on a credible geography and a sense of place, ensuring that our residents have a voice in these early discussions.

We will set out the principles that will guide this work and some of the practicalities and challenges in undertaking it and we will highlight how delivery of existing council services will continue uninterrupted through this process.

2. Getting it right for Devon

Devon is a great place to live and work and people feel a sense of connection to their communities. We have beautiful countryside, including two national parks, stunning coastlines, an abundance of heritage with two historic cities, good schools and nationally recognised universities. We also have major challenges such as an ageing population placing huge pressure on public services, significant pockets of deprivation, low skills, low wages, and a need for more opportunities for our young people.

Set out in the appendix to this interim plan is a detailed socio-economic, demographic and health context that describes our area including key economic drivers, growth opportunities and constraints. It also provides the context of our current local government structure, headline financial positions including council tax base, staffing and electoral numbers. It describes our wider public sector infrastructure including the health system and the range of strategic partnerships across the area.

2.1. Context of the Devolution White Paper

On 5th February 2025, the Minister of State for Local Government wrote to Devon County Council, along with all Devon district councils and the neighbouring unitary councils, Plymouth City Council and Torbay Council. The Minister asked for interim plans for local government reorganisation (LGR), to be submitted to the Government by 21st March 2025. The government has set out, as part of a statutory invitation, the criteria that proposals for LGR must meet.

In responding to the Government's invitation, we are committed to working closely with other councils, our other public sector partners, town and parish councils, national parks, community and voluntary organisations, business and others. We have already begun discussions with other Devon councils and with a broad range of stakeholders within the county. We will engage with residents as proposals develop.

At this stage, there is no agreement between Devon local authorities on a single preferred proposal for unitary local government and a range of different options are being considered. The Government has made clear that interim plans can consist of a number of ideas or options and that anything submitted by 21st March 2025 is not a final decision point. Our interim plan provides information about a number of different options. The Government's feedback on these options will inform the development of a final proposal to be submitted by the new Council in November 2025.

2.2. Key considerations

The current two-tier system in Devon, alongside the existing unitary structures in Plymouth and Torbay, has served communities for many years. However, there are clear challenges that require consideration including financial pressures, service demand, and the need for greater integration of public services.

Experience from other areas that have undergone reorganisation demonstrates that unitary models can:

- Simplify governance and decision-making.
- Improve service integration, particularly between social care, housing, and health.
- Achieve financial efficiencies through economies of scale.
- Achieve greater financial resilience through stronger balance sheets.

In considering the Government's criteria and our own aims in the process of local government reorganisation, any future model must:

- Be for a sensible economic area with an appropriate tax base, which does not create any undue advantage or disadvantage for one part of the area.
- Have appropriate scale, aiming for a population of 500,000 or more, to enhance resilience and capacity – ensuring local government can withstand financial shocks, respond to service pressures, and operate efficiently in the long term.
- Deliver improved services – creating structures that enable high-quality, accessible, and responsive local services. The Government has highlighted, in particular, the importance of considering the impacts of reorganisation for social care, children's services, SEND, homelessness and public safety.
- Achieve financial resilience – providing a stable financial foundation that delivers value for money, eliminates duplication, and reduces overhead costs.
- Be locally accountable – ensuring strong democratic engagement, with decisions made at the right level and which deliver neighbourhood empowerment.
- Align with wider public sector geography – recognising that health, policing, transport, and economic partnerships operate at different levels and need coordination across boundaries.
- Develop a single 'local plan', increase housing supply to meet local needs while making sure development is in the right place and it is easier to secure investment from housing developers to pay for roads, schools and other vital infrastructure.
- Create services which can protect the county from the effects of climate change and natural events such as flooding or a pandemic.
- Support future devolution – we view the creation of the Devon and Torbay Combined County Authority as the start of our devolution journey and will explore ways to broaden and deepen collaboration with neighbouring councils in a Mayoral Strategic Authority, as we seek greater resources and powers to be passed from Whitehall to Devon.

2.3. Capacity and Financial Resilience

Any new local government arrangement in Devon must ensure councils have the scale and resources to be financially resilient. A key risk in any transition is the cost of change, the pace and scale of financial benefit realisation, the impact on financial reserves, outstanding liabilities, and the ability to manage demand-led services such as social care and children's services. Existing financial pressures and commitments must be factored into any assessment of reorganisation. There should also be recognition of the impacts of partners' financial resilience in delivering council services, e.g. without effective partnerships with health, social care costs could not be contained.

Maintaining ongoing responsible and prudent management of assets, liabilities, investments and capital financing must support the overall objectives and viability of structural change, providing the best possible legacy for any successor local authority.

2.4. Cost Drivers and Efficiency Gains

Reorganisation presents opportunities for efficiencies, particularly through the reduction of duplication in back-office functions, senior management, the opportunity from economies of scale, and optimisation of physical assets and operating systems. Previous unitary transitions have demonstrated that efficiencies can be realised but require upfront investment and careful implementation.

2.5. Population Size and Government Guidance

The Government has indicated that unitary councils should ideally serve a population of at least 500,000 to ensure viability. In Devon, potential models would need to reflect this principle while ensuring local governance remains effective, with area arrangements and strong partnership working with town and parish councils.

2.6. Potential Risks – Disaggregation and Boundaries

One of the most significant risks in local government reorganisation is the fragmentation of services, particularly in areas such as children's services, adult social care, and waste management. A fragmented approach could lead to inefficiencies and increased costs if core services need to be split across multiple authorities and poorer outcomes for the residents of Devon.

Similarly, boundary considerations must align with community identity, travel-to-work patterns, and economic geographies. Changes that disrupt existing functional partnerships could create inefficiencies and undermine the effectiveness of local government.

2.7. Co-design with local partners, business and residents

Throughout any change process, we are committed to working closely with other councils, our public sector partners and key organisations in the county, including town and parish councils, community and voluntary organisations, and business. We will also engage with residents as proposals develop and see the involvement and input of local communities as important throughout this process.

In the last six weeks, we have more than 60 regular and informal discussions with local authority partners and key stakeholders including:

- DCC Leader and Chief Executive meetings with the 11 Councils
- Individual 1-2-1 meetings between Leaders and Chief Executives
- Local MPs – 8 (Steve Race MP, David Reed MP, Martin Wrigley MP, Caroline Voaden MP, Rebecca Smith MP, Sir Geoffrey Cox MP, Ian Roome MP, Mel Stride MP’s Senior Researcher)
- Earl of Devon
- DCC Leader and Chief Executive meetings with Torbay and Plymouth councils
- Meetings of Devon Chief Executives Group
- Weekly Chief Executive meetings with Torbay and Plymouth
- Meeting with the Police and Crime Commissioner
- Meetings with the Integrated Care Board and with local healthcare trusts
- 1-2-1 meetings of Chief Executive and Chief Executives of Local Health Care Trusts
- Meeting with the Devon Association of Local Councils representing over 400 town and parish councils
- Meetings of the Section 151 Officers across Devon and an agreement to data sharing.
- Chamber of Commerce, Confederation of Business Industry and the Federation of Small Business
- Dartmoor National Park and Exmoor National Park Authorities
- Higher Education – Exeter University

Informal stakeholder feedback has been positive about local government reorganisation and the potential benefits that can be achieved in terms of efficiencies and improved customer service, and the aims set by Government and our own guiding principles. There is broad agreement that reform is needed to achieve financial resilience and deliver services that meet the needs of our residents now and in the future. There is a firm recognition of the importance of having robust and solid evidence to help develop the final submission made in November. At the same time, several stakeholders have raised concerns over the pace of change and maintaining services during the process.

Our health system partners, One Devon ICS, and the Police and Crime Commissioner are strongly supportive of simplified local government arrangements at the right scale and the opportunities for reform and stronger partnerships across regional systems that is offered through local government reorganisation.

Our business representative organisations and Earl of Devon have highlighted the significance of the Devon identity and brand and having a sensible economic geography recognising regional connectivity and the right structure that can strengthen devolution arrangements. There was also a recognition of the importance of our history and culture and recognising this in the next stages of the process.

Our Association of Local Councils and National Parks have emphasised the need to be included in this process and the significance of their engagement to provide a local community voice and say in the changes planned. They have highlighted the opportunity to strengthen community empowerment with the right resources and decisions taken at a local level. We are delighted that both the Association of Local Councils and our two National Park Authorities are committed to co-designing and working on community and local representation as we move forwards with developing a full proposal.

We are committed to maintaining strong engagement and collaboration in future months as we review options and develop a detailed full plan. We will also carry out an extensive programme of public engagement to gain a strong understanding of the views of residents including their views related to place and identity.

3. Preliminary LGR Options Appraisal

3.1. Overview of approach

We have carried out a preliminary options appraisal, to review potential new local government arrangements and how they align to the criteria set by the Government for this process. All options considered to date have followed the guidance issued on 5 February 2025 and used district council boundaries as the building blocks for this initial work. We recognise that other options may emerge informed by further analysis and evidence and clarification from MHCLG particularly on size and boundaries.

At this stage we have identified five potential options and a baseline scenario.

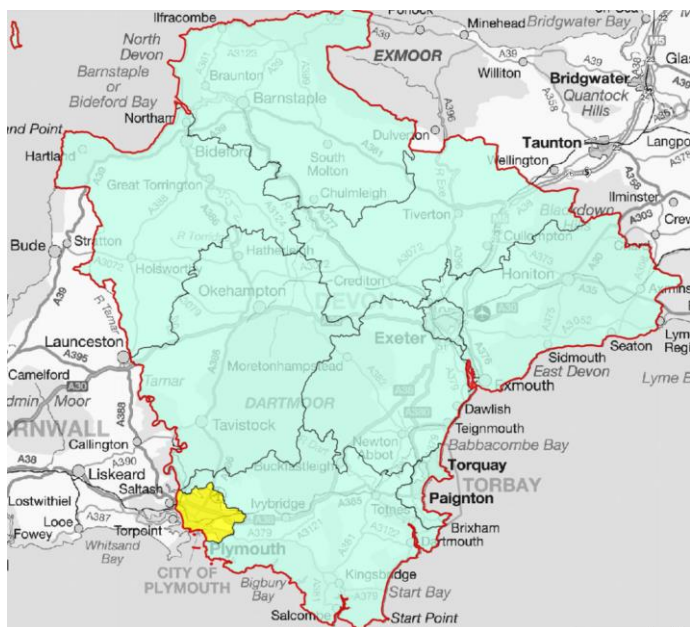
We have considered a single unitary council for the whole area of Devon, including Plymouth and Torbay administrative areas as a baseline scenario and not as an option we are considering at this stage. It has been the starting point to bench mark the following five options:

1. A two unitary model for Plymouth and Devon:
 - Plymouth, remains on existing boundaries;
 - Devon, includes Torbay, South Hams, West Devon, Teignbridge, Exeter, East Devon, Mid Devon, North Devon and Torridge.
2. A two unitary model based on North and South areas of Devon:
 - South Devon includes Plymouth, Teignbridge, South Hams and Torbay; and
 - North Devon includes Exeter, East Devon, North Devon, Torridge, West Devon and Mid Devon.
3. A two unitary model based on South West Devon and North East Devon:
 - South West Devon includes Plymouth, South Hams and West Devon; and
 - North East Devon includes Exeter, East Devon, Torbay, Teignbridge, North Devon, Torridge and Mid Devon.
4. A three unitary model of Plymouth, Greater Exeter and the rest of Devon:
 - Plymouth, remains on existing boundaries;
 - Greater Exeter includes Exeter, East Devon and Mid Devon; and
 - the rest of Devon includes Torbay, Teignbridge, North Devon, Torridge, South Hams and West Devon.
5. A three unitary model of Plymouth, North East Devon and South West Devon:
 - Plymouth, remains on existing boundaries;
 - North East Devon, includes Exeter, East Devon, Mid Devon, North Devon and Torridge; and
 - South West Devon, includes Torbay, South Hams, Teignbridge and West Devon.

3.2. Option 1

Two unitary authorities:

- Plymouth with existing boundary – shown in yellow.
- Devon - combining the areas of the current 8 districts and Torbay shown in green.

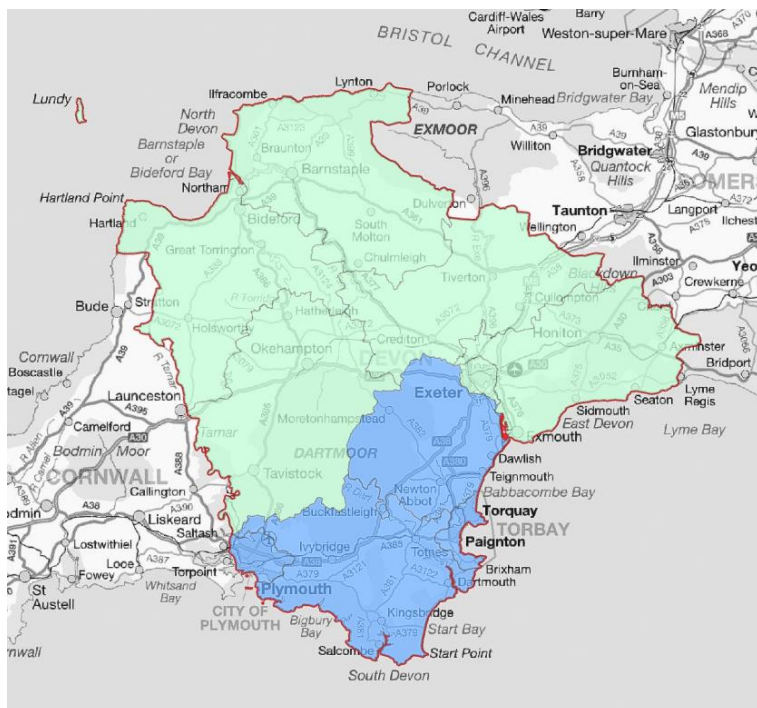


Indicator	Plymouth	Devon	England
Population: Total	268,736	972,893	-
Population aged 0-15	46,112 (17.2%)	151,697 (15.6%)	18.5%
Population aged 16-64	172,023 (64.0%)	565,920 (58.2%)	62.9%
Population aged 65+	50,601 (18.8%)	255,276 (26.2%)	18.7%
Population Change 2018-2023: Total	+ 3,047 (+1.1%)	+ 44,959 (+4.8%)	+3.2%
Population Change 2018-2023: 0-15	-546 (-1.2%)	+1,105 (+0.7%)	+0.9%
Population Change 2018-2023: 16-64	+612 (+0.4%)	+24,764 (+4.6%)	+2.7%
Population Change 2018-2023: 65+	+2,981 (+6.3%)	+19,090 (+8.1%)	+6.9%
Area Size (sq. km)	80	6,627	-
Population Density	3,366	147	434
Council Tax Base (all)	123,273	466,757	-
Gross Value Added	£6.97 bn	£24.46 bn	-
Gross Value Added per worker	£57,315	£59,972	£73,390
VAT Reg Business	6,280	42,820	-
VAT Reg Businesses per 100 people	2.3	4.4	4.1
Income deprived (%)	14.8%	10.8%	12.9%
Annual Housing Completions vs Target	25.1% (324/1,290)	59.9% (4,353/7,272)	62.1%
Average FT Salary to House Price Ratio	6.7 (£31.6k/£210.6k)	9.7 (£31.8k/£307.8k)	8.3 (£35.1k/£290.0k)

3.3. Option 2

Two unitary authorities in North and South Devon:

- South Devon, including Plymouth, Teignbridge, South Hams and Torbay – shown in green.
- North Devon, includes Exeter, East Devon, North Devon, Torrige, West Devon and Mid Devon – shown in blue.

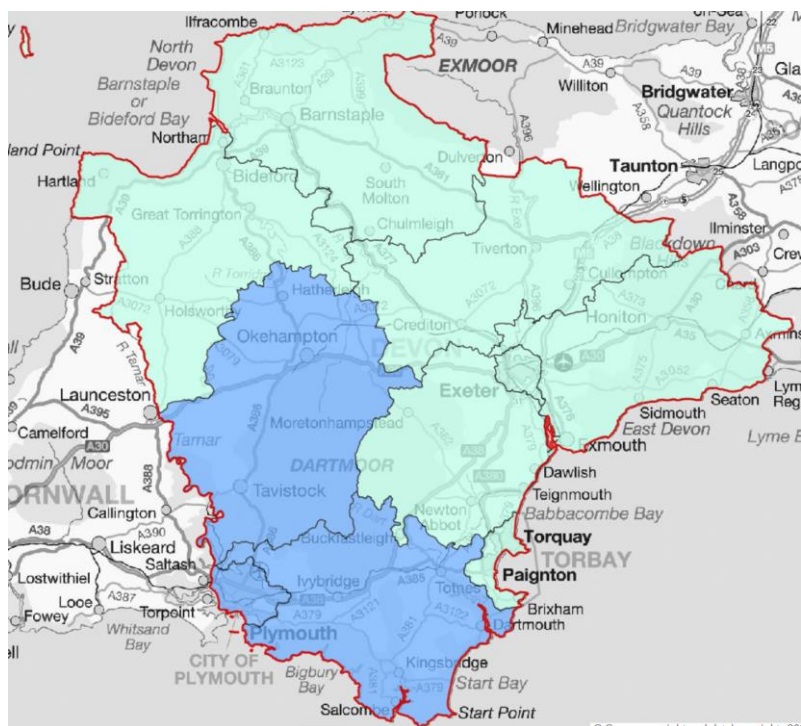


Indicator	North Devon	South Devon	England
Population: Total	605,492	639,137	-
Population aged 0-15	94,153 (15.5%)	103,656 (16.3%)	18.5%
Population aged 16-64	357,906 (59.1%)	380,037 (59.7%)	62.9%
Population aged 65+	153,433 (25.3%)	152,444 (24.0%)	18.7%
Population Change 2018-2023: Total	+34,239 (+6.0%)	+13,767 (+2.2%)	+3.2%
Population Change 2018-2023: 0-15	+1,196 (+1.3%)	-637 (-0.6%)	+0.9%
Population Change 2018-2023: 16-64	+21,058 (+6.3%)	+4,318 (+1.1%)	+2.7%
Population Change 2018-2023: 65+	+11,985 (+8.5%)	+10,086 (+7.1%)	+6.9%
Area Size (sq. km)	5,004	1,703	-
Population Density	121	374	434
Council Tax Base (all)	285,190	304,840	-
Gross Value Added	£16.65bn	£14.78bn	-
Gross Value Added per worker	£65,121	£53,984	£73,390
VAT Reg Business	27,610	21,490	-
VAT Reg Businesses per 100 people	4.6	3.4	4.1
Income deprived (%)	9.7%	13.5%	12.9%
Annual Housing Completions vs Target	68.0% (2,946/4,332)	40.9% (1,713/4,230)	62.1%
Average FT Salary to House Price Ratio	9.5 (£32.7k/£310.4k)	8.5 (£30.9k/£264.3k)	8.3 (£35.1k/£290.0k)

3.4. Option 3

Two unitary authorities in South West and North East Devon:

- South West Devon includes Plymouth, South Hams and West Devon – shown in blue.
- North East Devon includes Exeter, East Devon, Torbay, Teignbridge, North Devon, Torrridge and Mid Devon – shown in green.

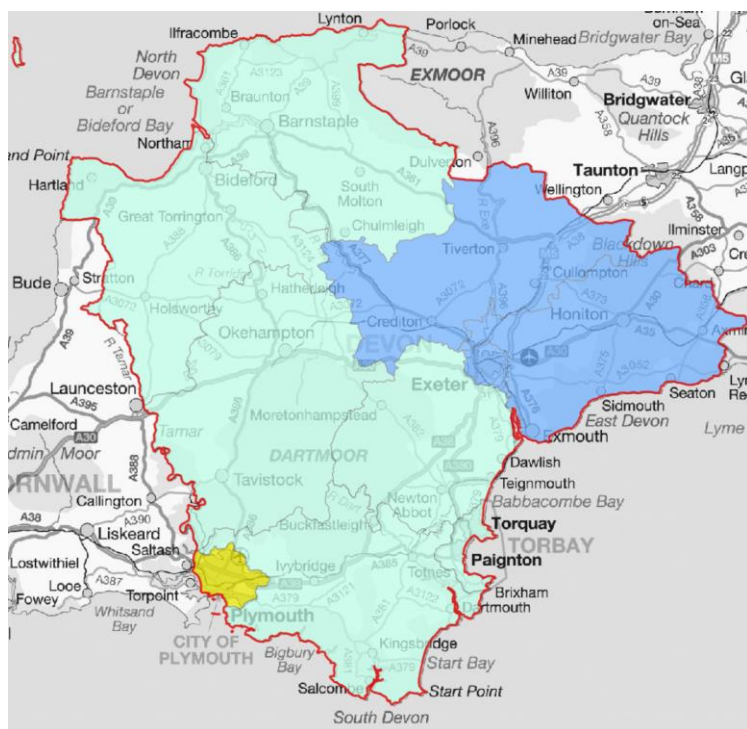


Indicator	North/East Devon	South/West Devon	England
Population: Total	786,143	407,210	-
Population aged 0-15	129,091 (15.7%)	68,718 (16.4%)	18.5%
Population aged 16-64	482,232 (58.6%)	255,711 (61.1%)	62.9%
Population aged 65+	211,974 (25.7%)	93,903 (22.4%)	18.7%
Population Change 2018-2023: Total	+36,884 (+4.7%)	+11,122 (+2.7%)	+3.2%
Population Change 2018-2023: 0-15	+640 (+0.5%)	-81 (-0.1%)	+0.9%
Population Change 2018-2023: 16-64	+21,214 (+4.6%)	+4,162 (+1.7%)	+2.7%
Population Change 2018-2023: 65+	+15,030 (+7.6%)	+7,041 (+8.1%)	+6.9%
Area Size (sq. km)	4,581	2,126	-
Population Density	180	197	434
Council Tax Base (all)	391,955	198,075	-
Gross Value Added	£21.03bn	£10.39bn	-
Gross Value Added per worker	£60,541	£57,111	£73,390
VAT Reg Business	34,415	14,685	-
VAT Reg Businesses per 100 people	4.2	3.5	4.1
Income deprived (%)	11.1%	12.9%	12.9%
Annual Housing Completions vs Target	58.5% (3,462/5,919)	46.0% (1,215/2,643)	62.1%
Average FT Salary to House Price Ratio	9.4 (£31.8k/£299.8k)	8.2 (31.9k/£261.0k)	8.3 (£35.1k/£290.0k)

3.5. Option 4

Three unitary authorities in Plymouth, Greater Exeter, and the rest of Devon:

1. Plymouth with existing boundaries – shown in yellow.
2. Greater Exeter, including Exeter, East Devon and Mid Devon – shown in blue.
3. Rest of Devon, including Torbay, Teignbridge, North Devon, Torrridge, South Hams and West Devon – shown in green.

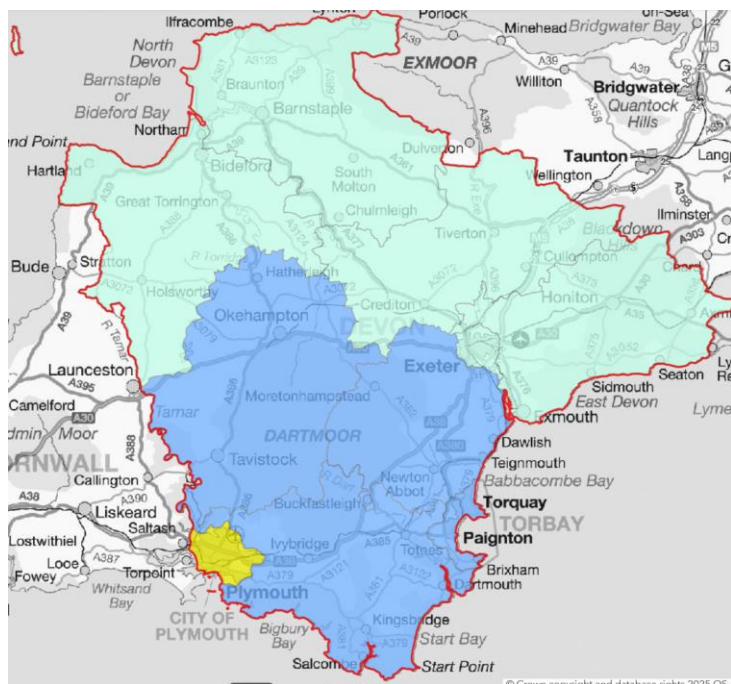


Indicator	Plymouth	Greater Exeter	Rest of Devon	England
Population: Total	268,736	377,365	595,528	-
Population aged 0-15	46,112 (17.2%)	58,488 (15.5%)	93,209 (15.7%)	18.5%
Population aged 16-64	172,023 (64.0%)	229,148 (60.7%)	336,772 (56.6%)	62.9%
Population aged 65+	50,601 (18.8%)	89,729 (23.8%)	165,547 (27.8%)	18.7%
Population Change 2018-2023: Total	+ 3,047 (+1.1%)	+25,598 (7.3%)	+19,361 (+3.4%)	+3.2%
Population Change 2018-2023: 0-15	-546 (-1.2%)	+1,727 (+3.0%)	-622 (-0.7%)	+0.9%
Population Change 2018-2023: 16-64	+612 (+0.4%)	+17,558 (+8.3%)	+7,206 (+2.2%)	+2.7%
Population Change 2018-2023: 65+	+2,981 (+6.3%)	+ 6,313 (+7.6%)	+12,777 (+8.4%)	+6.9%
Area Size (sq. km)	80	1,774	4,853	-
Population Density	3,366	213	123	434
Council Tax Base (all)	123,273	174,430	292,320	-
Gross Value Added	£6.97 bn	£11.80 bn	£12.65 bn	-
Gross Value Added per worker	£57,315	£75,653	£50,256	£73,390
VAT Reg Business	6,280	15,690	27,130	-
VAT Reg Businesses per 100 people	2.3	4.2	4.6	4.1
Income deprived (%)	14.8%	8.9%	12.0%	12.9%
Annual Housing Completions vs Target	25.1% (324/1,290)	70.7% (1,809/2,560)	54.0% (2,544/4,712)	62.1%
Average FT Salary to House Price Ratio	6.7 (£31.6k/£210.6k)	9.3 (£34.1k/£318.5k)	9.9 (£30.5k/£301.0k)	8.3 (£35.1k/£290.0k)

3.6. Option 5

Three unitary authorities in Plymouth, North East Devon and South West Devon.

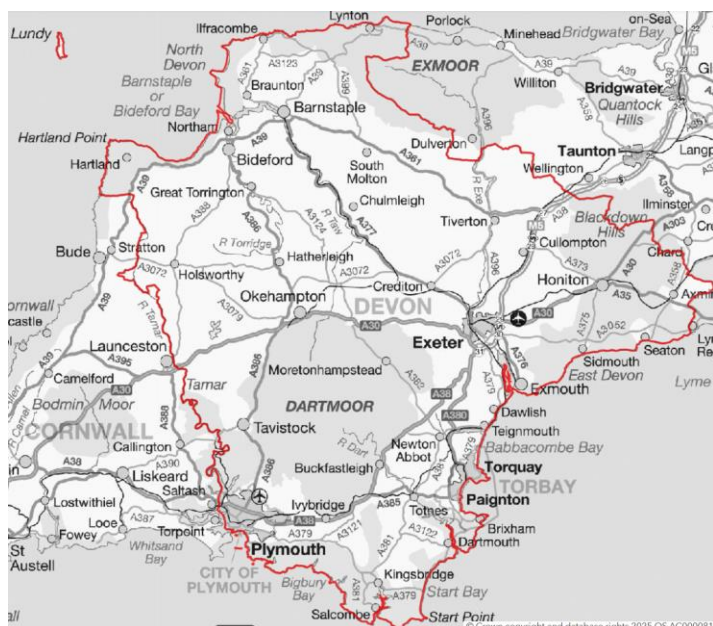
1. Plymouth with existing boundaries – shown in yellow.
2. North East Devon, includes Exeter, East Devon, Mid Devon, North Devon and Torridge – shown in green.
3. South West Devon, includes Torbay, South Hams, Teignbridge and West Devon – shown in blue.



Indicator	Plymouth	North/East Devon	South/West Devon	England
Population: Total	268,736	546,738	426,155	-
Population aged 0-15	46,112 (17.2%)	85,572 (15.7%)	66,125 (15.5%)	18.5%
Population aged 16-64	172,023 (64.0%)	324,922 (59.4%)	240,998 (56.6%)	62.9%
Population aged 65+	50,601 (18.8%)	136,244 (24.9%)	119,032 (27.9%)	18.7%
Population Change 2018-2023: Total	+ 3,047 (+1.1%)	+31132 (+6.0%)	+13827 (+3.4%)	+3.2%
Population Change 2018-2023: 0-15	-546 (-1.2%)	+1453 (+1.7%)	-348 (-0.5%)	+0.9%
Population Change 2018-2023: 16-64	+612 (+0.4%)	+19608 (+6.4%)	+5156 (+2.2%)	+2.7%
Population Change 2018-2023: 65+	+2,981 (+6.3%)	+10071 (+8.0%)	+9019 (+8.2%)	+6.9%
Area Size (sq. km)	80	3,844	2,783	-
Population Density	3,366	142	153	434
Council Tax Base (all)	123,273	257,864	208,893	-
Gross Value Added	£6.97 bn	£15.74 bn	£8.72 bn	-
Gross Value Added per worker	£57,315	£68,085	£49,349	£73,390
VAT Reg Business	6,280	24,450	18,370	-
VAT Reg Businesses per 100 people	2.3	4.5	4.3	4.1
Income deprived (%)	14.8%	9.7%	12.2%	12.9%
Annual Housing Completions vs Target	25.1% (324/1,290)	67.8% (2,637/3,889)	50.7% (1,716/3,383)	62.1%
Average FT Salary to House Price Ratio	6.7 (£31.6k/£210.6k)	9.4 (£33.0k/£311.5k)	10.0 (£30.4k/£303.1k)	8.3 (£35.1k/£290.0k)

3.7. Baseline Scenario

A Unitary Devon Authority – combining Devon County Council, Torbay Council and Plymouth City Councils administrative areas.



Indicator	Unitary Devon	England
Population: Total	1,241,629	-
Population aged 0-15	197,809 (15.9%)	18.5%
Population aged 16-64	737,943 (59.4%)	62.9%
Population aged 65+	305,877 (24.6%)	18.7%
Population Change 2018-2023: Total	+48,006 (+4.0%)	+3.2%
Population Change 2018-2023: 0-15	+559 (+0.3%)	+0.9%
Population Change 2018-2023: 16-64	+25,376 (+3.6%)	+2.7%
Population Change 2018-2023: 65+	+22,071 (+7.8%)	+6.9%
Area Size (sq. km)	6,707	-
Population Density	185	434
Council Tax Base (all)	590,030	-
Gross Value Added	£31.43 bn	-
Gross Value Added per worker	£59,328	£73,390
VAT Reg Business	49,100	-
VAT Reg Businesses per 100 people	4.0	4.1
Income deprived (%)	11.7%	12.9%
Annual Housing Completions vs Target	54.6% (4,677/8,562)	62.1%
Average FT Salary to House Price Ratio	9.0 (£31.8k/£286.8k)	8.3 (£35.1k/£290.0k)

3.8. Other potential options

- **No change for Plymouth and Torbay, with a unitary across the Devon two-tier area.**
The Government has put both Plymouth and Torbay in scope for the reorganisation process although could choose not to pursue this, with change required only in the two-tier area of Devon. In this scenario, only a single new council across the two-tier area would ensure unitary arrangements which meet the Government's criteria on population size. A proposal for a single unitary authority for the whole area covered by Devon County Council was proposed by the Local Government Boundary Commission for England in July 2008.¹
- **Unitary authorities with expansion of boundaries involving a boundary review process.** Plymouth City Council has made a public statement that this is their preferred option, extending to cover 13 parish areas. This is more aligned to the Government's population criteria although still falls beneath the 500,000 threshold and it would require a boundary review and consultation with local parishes.
- **Other**
We will consider any proposals that are put forward as part of the process by partner local authorities that meet the Government criteria along with any further options from the County Council's new administration following the County Council elections in May. All options developed at the next stage will consider any Government feedback and further clarity on scale, boundaries and timescales.

3.9. Initial analysis

At this stage it is not possible to determine the optimum solution that would be right for the residents of Devon, and more analysis and detailed work is required which is set out below in section 4.

¹ <https://webarchive.nationalarchives.gov.uk/ukgwa/20221201172603/https://www.lgbce.org.uk/all-reviews/south-west/devon/devon-structural-review>

4. The work we will do from April to November 2025

4.1. Evidenced and Collaborative Approach

Over the coming months, we will take on board Government's feedback to this Interim Plan and undertake extensive work to examine the viability of potential options, their financial resilience and potential risks alongside the opportunity for public service reform underpinned by local identity and all other considerations. From this process, we will identify the option that best meets the set criteria, and our own aims, and then develop a full proposal by the November deadline. We would aim to do this collaboratively with local authority partners and seek to build consensus where possible on a preferred option for the area.

We will also continue to engage with other local authorities that have moved to a single unitary structure to learn lessons both in transition and implementation but also in regard of the benefits and challenges the new structures may be facing.

4.2. Voice of local communities

We will co-design the full proposal, working closely with our partners in the public sector, particularly for example, the NHS, on proposals for adult and childrens social care arrangements and SEND Services and consider broader approaches to health and wellbeing. This approach is critical to support our ambitions and service improvement journeys and deliver better outcomes for residents, public service reform and potential efficiencies.

We view town and parish councils and our national parks as key partners in co-design, bringing the voice of communities into the process and together we will consider how local councils may choose to have a greater role in future arrangements. Moving to a single unitary structure presents opportunities to recognise local place identities and through a broader devolution and localism approach develop new models of community engagement and locality working that can genuinely empower our neighbourhoods. We will equally engage with the VCSE Assembly in accordance with our Civic Agreement to work in partnership to improve the life chances of people in our communities.

Depending on the future model being developed, we would aim to work collaboratively with all 8 District Councils and Plymouth and Torbay unitary councils on the future local government arrangements to ensure that all councils have a full role in the next stages of the process.

4.3. Financial modelling

We will review the options for change, considering their different financial risk profiles and financial challenges. Any new model of local government must be designed to achieve financial resilience and sustainability, providing a stable financial foundation for local government in Devon that delivers value for money, eliminates duplication, and reduces overhead costs.

Financial impacts would vary according to the proposed structure. Pooling finances, demand and differential tax base risks could create advantage or disadvantage with very different

financial risk profiles and financial sustainability challenges, with issues of scale potentially affecting financial sustainability. Smaller unitary authorities could be exposed to risk from the business rates reset and impacts from national funding reform which may see further grant funding redistributed based on deprivation, and future council tax equalisation.

Further work is needed to understand how budgets and funding would be aggregated or disaggregated under any of the two or three unitary authority options considered including the equalisation of Government grants and potential loss of scale.

Further work is needed to disaggregate countywide service costs to district areas to better quantify these risks and we have commissioned Pixel Financial Management to assist with this work based on 2025/26 settlement information.

4.3.1. Impact on People Services

We have commissioned Newton Europe to undertake research on people-based services which will help identify benefits and risks from aggregation and disaggregation of services and other issues. This work is critical to understanding the potential costs and diseconomies of disaggregating services which currently represent approximately 70% of net service costs across Devon. The analysis will cover all ages and include SEND, Childrens and Adults Social Care, Homelessness and Public Health.

4.3.2. Cost of Change and Scale of Efficiencies

We will work to estimate the costs of change and scale of efficiencies, the timing of these being realised, and how such transition costs could be funded. For example, the flexible use of capital receipts would be the contingency option and a mechanism to fund longer term, more fundamental transformation savings subject to business cases. Capital costs of transition and subsequent transformational change such as for service design, assets and systems optimisation, and service improvement will require investment that could increase borrowing costs. Further work is also needed on impacts on the workforce and associated costs from disaggregation.

4.3.3. Council tax harmonisation

Council tax harmonisation is a critical consideration in any local government reorganisation, ensuring fairness for residents while maintaining financial stability for the new authority(ies). Lessons from other local government reorganisations suggest that harmonisation can significantly impact both council revenues and taxpayer contributions.

Our approach to council tax harmonisation will be guided by the following principles:

- Equity for residents: A consistent and fair approach across all areas to avoid significant disparities in local taxation.

- Financial resilience: Ensuring that the transition does not unduly impact the financial position of the successor authority(ies) and secures a strong tax base for local services for the whole area.
- How to transition: Recognising that sudden changes to council tax rates can create financial strain for residents could require a phased approach however this would need to be considered against the risk of lost income that could undermine financial resilience of the new unitary structure.
- Provide time for efficiency savings from reorganisation to materialise, offsetting any initial shortfalls, whilst recognising that efficiencies will also be required to offset increasing pressures and demand.

Discussions with Government will be essential to agree on a harmonisation approach that balances financial sustainability with fairness for taxpayers. Further detailed modelling will be undertaken to assess the precise impacts of different scenarios before a final decision is reached.

4.3.4. Harmonisation of fees and charges

In addition to Council Tax harmonisation there will be a need to harmonise other fees and charges such as for specific refuse collection, planning applications, parking charges, leisure facilities or licensing. We will consider these issues in our detailed analysis in the next phase of activity and set this out in the full proposal submitted in November.

4.3.5. Policy and Funding Reforms

Full consideration will also be needed of the following policies and reforms and the impacts on the options considered. Assumptions and a clear rationale for these will need to be developed and we will work collaboratively with partners to agree a common set of assumptions, where possible. The scope of this work will include:

- Local Government Funding Reforms and Multi-Year Settlements
- Deprivation Methodology for investment and funding decisions
- The Comprehensive Spending Review
- SEND White Paper / Road Map
- Further Devolution Priority Programme Opportunities
- Review of Social Care by Dame Louise Casey
- Employment Rights Bill

4.3.6. Future public service reform opportunities

Reorganisation is an opportunity for major service reform both of council services, and through new alignment and partnership with the wider public sector. We have identified many opportunities to improve services and improve value for money. At a general level these include:

- Working together with partners across the whole county, we can bring together countywide strategies like adult social care and public health with local strategies such as leisure, housing and local plans.

- Simplifying future council services making them easier to access and use, for example, one front door, phone number and website replacing the current multitude of access points.
- Prevention should underpin the design of services in a unitary council, maximising the benefits of service integration in a single tier.
- Digital and data at large scale can underpin service delivery and facilitate preventative approaches. Effective use of data and insight will enable interventions to be targeted where they will achieve the most impact and will enable us to monitor and evaluate that impact, to improve services and overall value for money.
- Workforce resilience can be strengthened, through a reduction in local competition in an already challenging recruitment market, more consistent training and practice, along with broader career progression opportunities to enhance the employment offer.
- Artificial Intelligence can be used to support administration and service delivery to improve productivity and value for money.

4.3.7 Adult services

Local Government Reorganisation offers the opportunity to strengthen partnerships between adult social care with the NHS, addressing gaps that are created because Council and Health boundaries don't currently align. This will allow better planning, market management and commissioning.

It will improve strategic working and the ability to meet resident needs more holistically by bringing together housing, community services strengthening the prevention offer.

Integration of housing and social care will also strengthen how we plan for the whole population, enhancing planning for supported housing, extra care schemes, and accessibility in new developments. This will enable us to support people to continue to live good lives in their communities and maximise the use of existing housing stock.

Devon already has the foundations of effective Community-Based Support by expanding local care networks, this will reduce reliance on institutional care and empower service users.

It will enable significant digital transformation using predictive analytics, telehealth, and a unified digital care record to improve efficiency and outcomes for people.

A unitary model will allow us to create a stronger Ageing Population Strategy, enabling proactive planning to support independence, reduce hospital admissions, and improve service access.

4.3.8 Homelessness and Housing Services

Local Government Reorganisation presents an opportunity to transform homelessness services by integrating housing, social care, and health support under a single authority. A unitary model enables a coordinated approach to prevention, faster response times, and streamlined access to temporary and permanent accommodation.

Improved data sharing across agencies will help identify at-risk individuals earlier, while better alignment with adult social care and mental health services ensures more effective long-term support. By reducing duplication and enhancing partnerships with the voluntary sector, a new unitary structure can deliver a more proactive, person-centred approach to tackling homelessness.

Bringing together strategic infrastructure, transport, school planning functions with local planning and housing services can help address the housing crisis across Devon, recognised by all 11 local authority partners. Options to join up functions would support a number of the recommendations identified in the nationally recognised Devon Housing Commission report and underpin current housing targets and delivery. The informal feedback we have received from the business community would support this opportunity. Examples of areas of reform include:

- Consistency across planning policies such as applying the relevant price paid for land rather than viability to support increasing house build numbers, and opportunity to develop a planning approach that can shape the types of housing brought forward.
- Working with the Devon and Torbay Combined County Authority develop a Devon-wide Housing Strategy and implementation approach.
- A common approach to recruiting and retaining planners and a skilled workforce.
- Single approach to use of public sector assets, across the whole public sector, including purchasing power on an acquisition strategy to support options for accommodating vulnerable individuals.
- Single approach to developing construction skills to underpin house building numbers.
- Local community engagement and opportunities to bring forward community land trusts and other community-led approaches, aided by developing neighbourhood empowerment models of delivery.
- Improved data sharing leading to accurate demand and forecasting assumptions consistently applied underpinning infrastructure planning and growth strategies.

4.3.9 Children's Services and SEND

A unitary structure across Devon would underpin securing and maintaining a permanent workforce and a single approach to supplementing this when needed with agency workers. Standard rates could lead to efficiencies across the system. Bringing together social services, education under a unitary structure, at the right scale with housing services would significantly improve supporting care leaver accommodation and transition planning. Bringing together leisure centres, with bus services, harmonised council tax systems and employment policies under a unitary structure would provide a single and consistent Local Offer easily accessed and understood, covering access to transport, housing, leisure and council tax exemptions to our young people, foster families and young carers. It would remove data sharing barriers between revenue and benefits and social services and improve the use of data and knowledge to underpin needs assessments for placements and sufficiency planning and help implement auto enrolment of free schools' meal, as two examples.

SEND sufficiency for families seeking both local placements close to home and placements that meet the needs of young people is one of the most challenging Local Government priorities facing both the County and across England. National reforms have been called for and will be recognised in an expected White Paper before July 2025. SEND will be a priority area for consideration in LGR.

4.4. Future governance

The Government is seeking early views on the proposed number of councillors for new authorities. In all the options appraised, a significant reduction in the number of councillors from the current arrangements will be achieved by removing representation at two tiers in the current Devon area. There are currently 328 district level councillors. The current number of councillors at the county and unitary levels shows significant variation in the average number of electors each councillor represents.

Council	Population/electorate	Councillors	Cllr: electorate
Devon	840,000	60	10,417
Plymouth	269,000	57	4,608
Torbay	139,500	36	2,872

We note from Local Government Boundary Commission and ONS data that 4,600 is the current average number of electors per councillor in unitary areas across England. However, the average current population size of unitary authorities at 265,000 is significantly smaller than the minimum population size of the unitary structure the Government is seeking to create in this process. It is therefore likely that larger councils will either require higher than average numbers of councillors, or that each councillor will have a significantly higher than average number of electors. The first scenario has an impact on costs, the second on representation. We would welcome the Government’s further guidance on this point around balancing the need to achieve efficiencies in new arrangements, with the importance of effective representation and strong democratic governance.

On 25 February 2025, a workshop was facilitated for all Devon County Council Councillors, supported by our political group Leaders. This gave all councillors an opportunity to consider reorganisation, key issues and questions which would need to be addressed in the development of proposals.

All political Group leaders meet weekly at a Governance working group to consider the information gathered so far, pose questions and the information needed to enable further consideration of the ratio of elected members to the electorate.

This Group will continue to explore opportunities to grow localism by devolving resources, powers and decision making to town and parish councils where there is the will, capacity and capability to do so. We will continue to work collectively with town and parish councils and their representative body in Devon, the Devon Association of Local Councils. This work will also

consider the experiences and new arrangements in other areas that have recently moved to a unitary model.

In liaison with political group leaders, our Cabinet has adopted an inclusive, participatory approach to evidence gathering and assessment on this topic.

4.5. Strategic Authority arrangements

In establishing the Devon and Torbay Combined County Authority, we have demonstrated a collaborative approach to working with neighbouring councils, public sector partners and Whitehall. The council is already on the devolution journey and is now exploring the creation of a Mayoral Strategic Authority with Plymouth and Torbay. The council is committed to Cornwall Council joining our discussions at any time.

Strategic working with our neighbouring authorities is vital to achieve the council's aims to maximise our economic potential, deliver investment, and create a stronger and more sustainable economy. The council is already working through the combined authority to support high growth business sectors such as marine engineering, defence, photonics and digital, as well as Devon's traditional strengths of tourism, agritech and food production. Joint strategic working is also under way to address housing pressures, improve local transport and meet net zero ambitions.

A strategic authority across the whole of Devon and, potentially with Cornwall, would add significantly to the opportunity and potential of devolution. We have worked effectively across the three upper tier authorities and have a long tradition of collaboration with Cornwall at a sub-regional level. We will take forward these discussions in the coming months with our business education and public sector partners.

It will be important to ensure that the approach to the creation of a Strategic Authority aligns strongly with local government arrangements following the reorganisation process.

4.6. Safeguarding our heritage and culture

We are committed to ensuring that any future unitary local government structure reflects the historic and cultural identities of the county's diverse communities. As part of the reorganisation process, we will work collaboratively with local stakeholders, including town and parish councils, heritage organisations, and community groups, across our rural, coastal and urban geography to safeguard and celebrate the unique character of Devon's cities, towns, villages, and rural areas.

By incorporating a co-design approach to local governance, Devon will strengthen civic engagement, enhance place-based decision-making, and support the distinct traditions and identities that make each community unique. This will be achieved through a combination of strategic planning, tailored service delivery, and a commitment to preserving Devon's rich heritage while creating a modern, effective, and financially resilient system of local government.

4.7. Public and Stakeholder engagement

At our Council meeting of 9 January 2025, Councillors emphasised the critical importance of engaging with communities on local government reform and considering any proposals from the perspective of residents and service users. We plan to run a comprehensive exercise to seek public views on the reorganisation and to test residents' affiliation to place. During this time, we will focus on making sure that changes are right for local people, are developed collaboratively, and are implemented effectively. There is a dedicated space on our website where we will provide regular updates, and where residents and organisations can share their views with us and via their local Councillor. We take an inclusive approach to listening to residents such as those with experience of the care system and will make specific plans to include these cohorts in engagement exercises. We plan further engagement over the coming months including the following groups:

Stakeholder	Who	Why
Public	Residents, community leaders	Engagement, understanding, identity
District councils	Leader, CEO, S151	Future options, data, service design
Unitary councils	Leader, CEO, S151	Future options, data, service design
Staff	Key leads, front line workers	Service design Reassurance
Unions	All	Reassurance, staff messaging
MPs	All	Future options, service design, identity
Town and Parish Councils	Leaders, elected members, clerks & DALC	Future options, service design, identity
Voluntary Community Sector	Sector Leaders, VCSE Assembly	Understand challenges, service design, identity
Businesses – FSB/Chambers/CBI etc	CEO of major employers and Business Representative Organisations, including by sector and place	Understand challenges at present to growth, opportunities and future options, identity
Police & Crime Commissioner		Future options, Service design, identity
Chief Constable		Future options, Service design
Health service	ICB, Local Care Partnerships	Future options, Service design
Rescue services - fire/ambulance	CEOs	Future options, Service design
Further and Higher Education and schools	Vice Chancellors, Principal/heads	Support to young people and pathways to employment, training, future options and service design, identity
Environment Agency	Local lead	Future model

Dartmoor and Exmoor National Parks	Chief Executive, Board	Future model and options, service design and identity
Neighbouring unitary authorities – Cornwall, Somerset, Dorset	Leaders/CEO	Cross border issues e.g. travel to work areas, devolution. Exmoor regarding Somerset

5. Barriers and challenges

The Government asked for views on anticipated barriers and challenges to be addressed over the coming months which we have assessed as including:

- Reaching agreement in Devon - as detailed above, currently, there is not agreement among the 11 councils in Devon on the form and structure of any future model of local government in the county. We will continue to seek to collaborate with all councils in this process through regular engagement, information sharing and in advancing the principles that will deliver better services to residents.
- Elections – We will hold elections in May 2025. With changes at the election, combined with members not seeking re-election, there will be many new members of the council. Aside from the establishment of any new administration, it will take some time to induct new members and to ensure that they are fully briefed on the LGR process.
- Elected member support and good governance. The view of our current administration is that the options appraisal process should allow for the new administration to take an evidence-based view on which option best meets residents’ needs. This is a significant factor in the approach we are taking at this stage and has implications for timelines.
- Possible boundary changes and timescales – any proposals that do not remain within district council administrative boundaries could add complexity and time to the process of moving to a new unitary structure. Any proposed electoral arrangements will need to satisfy Boundary Commission requirements. We are seeking more clarity on the Boundary Commission process, and their capacity and timelines, to understand how this will align to the implementation of reorganisation.
- National funding reforms and assumptions - local government funding reform due to take effect in the Comprehensive Spending Review from April 2026, including the delayed business rates reset. The current review of social care funding by Dame Louise Casey will also be potentially significant, along with the Employment Rights Bill.
- Demand and cost pressures particularly in adult social care, children and families, special educational needs and disabilities, home to school transport, homelessness/temporary accommodation, and national policy changes relating to all of these areas.
- NHS Settlement Locally – there is increasing demand across childrens and adult social care and SEND services. Funding challenges within one part of the health and social care system has consequences for the other system partners, including the Police. Levels of funding within the NHS locally will hold direct impacts for local government and needs to be a key consideration in developing a new single local authority structure across Devon, including Plymouth and Torbay.
- MHCLG capacity - all remaining two-tier areas in England have been invited to take part in the move to unitary government. This will create pressures on the lead department, MHCLG and indeed other relevant government departments, such as DHSC and DFE to support the reorganisation process.
- Sufficient information and time to consult with key stakeholders and communities.

6. Transition planning and continuity of service delivery

6.1. Capacity, Expertise and Resources

We have a small internal team, supported by external subject matter experts, that has been assembled to support the reorganisation process. This external expertise will cover a number of disciplines and provide knowledge of two-tier local government reorganisation, its financial information, structures and services; will support the development of the detailed full proposal; and support the definition of the design for delivering a model of local government for Devon.

This work will undertake an options appraisal and service design working in collaboration with the other Devon councils and public sector partners where possible. It will also seek to incorporate the work and recommendations of the Member governance group and other partners. It will operate in such a way that the public, businesses, other public sector partners can input into developing options in the coming months.

6.2. Capacity Funding

In terms of capacity funding for the work to be completed to develop a full proposal by November, this is yet to be finalised. Our approach would be to provide the leadership needed as part of business as usual for the Council. Capacity funding for additional costs incurred such as for the following is likely to be required:

- Technical Support on financial analysis
- Newton Europe and other expertise to support analysis on the impacts on people-based services
- Public engagement including events, web-based polls etc and
- Any legal and democratic support to develop Elected Member representations, potentially proposed boundary changes, parish-ing where parishes do not exist, and community structures including devolving decision making.

6.3. Indicative Implementation Costs

Work is being undertaken to understand the costs and benefits associated with reorganisation in Devon. The potential benefits must be robustly assessed and considered alongside the one-off costs of delivering the changes. The costs of transition to any new structure will be considerable. Costs will include potential impacts of disaggregating services, workforce costs (redundancy and pension allowances), systems alignment, ICT, contract changes, estates and facilities, legal, professional and specialist support, communications, branding and training costs. We will consider payback periods as part of the evidence base as we move forwards and the potential benefits.

National research has been undertaken around the costs and benefits of local government reorganisation, whilst there is a body of evidence from those areas that have undergone reorganisation over recent years including from neighbouring authorities in Somerset, Cornwall and Dorset.

Devon has a population of over 1.2 million people, across 11 local authorities, which includes two existing unitary councils. Therefore, this will be a large and complex reorganisation

programme. From previous local government reorganisation, we know costs have been reported informally in national LGR network discussions as ranging from £20m to over £100m. We will confirm our view on the expected cost of implementation in our final submission to government in November.

6.4. Collaborative and Cost Sharing Approach

Where there is agreement, costs of the work required will be shared as appropriate across the councils in Devon whilst any funding made available by government will be utilised by this group with the agreement and authorisation of the respective leadership teams of the Devon councils. The Devon S151 and Chief Executive group would be the proposed forum where this is considered.

The work will be developed while not distracting the organisation and allowing it to focus on delivering business as usual. A 'check, challenge and development' approach will be applied which allows Members and the senior leadership team to provide shaping, development and influence the design, both during and at the conclusion phase of the options appraisal. These options will then be used for wider engagement and further refinement.

Our intention is to reach a democratically confirmed position before November in collaboration with local partners, and we hope that timely further feedback from MHCLG in response to this interim plan will assist us in doing so.

6.5. Continuity of service delivery

To ensure that services continue to be delivered and improved, a small core group of staff will focus on reorganisation, leaving the remaining staff and senior leaders to focus on continuing to deliver and improve services for the people of Devon.

Context

A.1 Our Devon

Devon is a great place to live and work with a good quality of life. Beautiful countryside, including two national parks, stunning coastlines, low crime rates, an abundance of heritage and culture, two historic cities, towns and villages, good schools and nationally recognised universities are just some of the many benefits enjoyed by our county. People feel a sense of connection to their place, and specifically to where they live, where many benefit from strong and thriving communities.

Devon sits at the heart of the South West, boasting a rich history, vibrant culture, and a diverse economy. The area is home to a world-renowned food and drink sector, a growing reputation as a global leader in environmental science, and—with its stunning landscapes—a well-earned status as a prime destination for visitors, learners, and investors alike, with 30 million tourist visits per year.

But the beauty of our county conceals major challenges we face both now and in the future; challenges that will simply increase in their scale over time. An ageing population will put huge pressure on public services whilst there are significant pockets of deprivation, low skills, low wages, and therefore there is a need for more opportunities, and improvements in public transport across the county which would help to reduce these impacts.

We face increased demand as younger adults with more complex needs represents 50% of the people we support. Ensuring sufficiency and resilience will become more challenging as demand continues to increase.

We face challenges in our natural environment including from climate change, such as erosion and flooding. We face challenges in providing opportunities for our young people and there has been sustained financial pressures on children's services but with improving outcomes. There is a critical shortage of affordable housing across the county, and this is felt most keenly by younger generations, vulnerable families and public sector workers. We face challenges around creating the conditions for sustainable economic growth with many of our businesses reliant on seasonal tourism and agriculture, whilst Devon has lower economic productivity per head than many parts of the UK.

Our vision is for a Devon where everyone can reach their full potential and live healthy, safe, lives. For Devon to meet these challenges, local government must play its full part and engage with public sector reform.

A.2 Geography and population of Devon

Devon has a mix of urban, coastal and rural characteristics. Its area is 2,590 square miles, it has dual coastlines extending approximately 435 miles, and a population density of just over 479 people per square mile, however this varies greatly across the county. According to the 2021 Rural Urban Classification, 33% of Devon's population is classed as rural, compared with 17%

nationally. 19% of the Devon population are also in rural areas distant from a major town or city (defined as no settlement with a population of 75,000+ within a 30-minute drive-time), compared to 6% nationally. This pattern also extends to the urban population with 19% of urban areas distant from a major town or city compared with 7% nationally. In terms of these major towns and cities, Devon has three sub-regional centres comprising 44% of the total population: Exeter, Plymouth and Torbay. These centres, together with fifteen further towns with over 10,000 population, mean that Devon has a mix of urban, coastal and rural characteristics.

Devon’s population of 1,241,629 is divided on the following existing local authority areas:

Authority area	Population
Devon County Council	833,408
Torbay Council	139,485
Plymouth City Council	268,736

Devon’s population grew by around 4% or around 48,000 between 2018 and 2023, a faster rate than the average in England (3.2%). Such growth varies within the county. Eastern Devon has a fast-growing population, including of under 16s, whilst in some southern and western areas of Devon including Torbay and Plymouth the number of under 16s is declining.

Across all areas, Devon has an ageing population with 305,877 or 24.6% of the total population aged over 65. The average across England for those aged 65 or above is 18.7%. Between 2018 and 2023, Devon’s elderly population grew faster than other age groups in the county – 7.8% vs 3.6% for those aged 16-64 and an increase of 0.3% for those under 15. Over the same period, Devon’s ageing population grew faster than the average in England of 6.9%. Almost all of its projected population growth is of elderly persons outside the working age population. Longer-term population growth between 1981 and 2023 in Devon (25.3%) exceeded national growth (20.7%), and projected growth between 2023 and 2043 is expected to be higher in Devon (12.8%) than national growth (9.2%).

According to the 2021 Census, Devon is much less ethnically diverse than most areas of England with particularly low proportions of Asian (1.6% vs 9.6%) and Black (0.5% vs 4.2%) ethnic groups compared to England.

A.3 Wider Population Characteristics

Health, care and wellbeing

Within the One Devon Integrated Care system our priority target population cohort for health inequalities covers those living in areas in the 20% most deprived neighbourhoods nationally; individuals, families and communities experiencing rural and coastal deprivation; individuals, more vulnerable communities including homeless persons, migrants and those experiencing domestic abuse; and persons with severe mental illness and learning disability and neurodivergent conditions. Socio-economic deprivation is the strongest predictor of health outcomes and Devon has both hotspots of urban deprivation with the highest overall levels within Plymouth, Torbay and Ilfracombe, with hotspots in other urban centres including Exeter and Barnstaple. Many rural and coastal areas, particularly in North and West Devon experience

higher levels of deprivation, impacted by low wages and a high cost of living. Average life expectancy and healthy life expectancy (the number of years someone can expect to live in good health) are both much lower in more deprived communities. Within Devon there is a 15-year gap in average life expectancy (Central Ilfracombe at 75 years vs Exmouth Liverton at 90 years) and a 20-year gap in average healthy life expectancy (Plymouth Devonport at 52 years vs Exe Estuary at 72 years). A larger gap for healthy life expectancy means people in poorer communities spend more years of their life in poor health as well as dying younger.

Devon has much lower mental health outcomes than the national average. A wide range of indicators from the Public Health Outcomes Framework highlight poorer mental health outcomes in the Devon area including higher suicide rates, self-harm admission rates, lower employment rates for people with mental health conditions, and lower levels of access to and usage of services. This pattern is reflected across the South-West Peninsula, where rural and coastal deprivation also contribute to mental health and wellbeing.

In relation to health and care activity within Devon during 2023/24 there were:

- 398,345 admissions to hospital
- 9,308 births
- 1,727 admissions to care homes
- 11,493 adults receiving long-term community social care support
- 2,529 carers receiving carer specific services
- 7,507 children in need (needing help and protection due to risks to development/health)
- 1,686 looked after children
- 1,230 child protection plans

A.4 Key economic indicators

Devon is an area with a strongly recognised external inward investment and visitor identity and brand. Its people identify strongly with both their local towns, cities and villages and with the wider county. It has an economy worth £31.4bn, the size of Manchester and larger than the economies of Edinburgh and Bristol.

Devon's economy is shaped by its coastlines, protected landscape, national parks, a large rural and agricultural area and a broadly spread and diverse manufacturing base across the county. The city of Exeter has a large travel to work area, which recognises the symbiotic relationship between the city and its hinterland, it is the most common destination by rail from areas up to 30 miles in all directions driven by commuting, education and retail. The city of Plymouth also has a strong influence upon its hinterland, but overall its impact is more concentrated within the city itself.

Devon has almost 50,000 VAT registered businesses providing over 500,000 jobs and grew at 21.4% between 2019 and 2022, making it a faster growing area than Cornwall, Bristol, Oxfordshire, Cambridgeshire, Berkshire, Milton Keynes, the City of London and Camden and Essex Thames Gateway.

Key economic hubs of note include Devonport Naval Base in Plymouth (the largest naval base in Western Europe), the Met Office based in Exeter and Exeter Science Park and Skypark, the

Universities of Exeter and Plymouth, the Rothamsted Institute (agricultural and land research) near Okehampton, Appledore as well multiple sites within the Plymouth and South Devon Freeport in Plymouth and its hinterland, focused around the marine and clean energy sectors, as well as defence.

Devon has a wealth of opportunities in terms of its offshore energy resource in the Celtic Sea off Northern Devon (one of the UK's largest offshore renewable energy resources) and the second largest Tungsten deposit globally at Hemerdon in the South Hams, forming part of the UK's critical minerals resource. It also has strong advanced manufacturing, digital and creative, agricultural, agritech, fishing and tourism sectors, with tourism attracting almost 30 million visits and supporting over £3.3bn of visitor spend annually.

Rural, urban and the coastal areas of Devon suffer from nationally significant levels of poverty, with parts of North Devon, Torbay and Plymouth amongst the 10% most deprived areas of England, and West Devon, Torridge and Torbay having among the lowest workplace-based wages of any authority in the country and with life expectancy in Ilfracombe among the lowest in the UK.

Nonetheless in most areas unemployment is below the national average, with productivity and earnings levels being of more concern. Social mobility and youth aspiration and progression are particular areas of concern, with around 40% of all young people leaving the area due to a lack of available housing and lack of attractive employment opportunities in many communities. The area faces significant challenges with skills and educational performance, with pockets of nationally significant educational need and some of the lowest Level 4 achievement rates in the country across its urban, rural and coastal areas.

A.5 Environment

Devon's stunning landscape, with its rolling hills, dramatic coast and winding rivers, has long been a source of inspiration. The county's natural beauty, historic, cultural, and ecological significance is reflected by its two National Parks (Dartmoor and Exmoor), five National Landscapes, two World Heritage Sites and the North Devon Biosphere Reserve.

The county's mix of habitats, such as its iconic hedgerows, ancient woodlands, orchards, heathlands, and parkland, supports internationally important populations of species, such as the European dormouse, European eel and greater horseshoe bat, and species that are not found anywhere else in the world, including the Lundy cabbage flea beetle.

Devon's coasts are home to diverse marine life, from nationally scarce pink sea fans to seals, dolphins, tuna and even whales becoming more frequent. The county is home to 15 Marine Conservation Zones, and the North Devon World Surfing Reserve recognises the area's outstanding coastal environment. Of Devon's 66 monitored bathing waters, 82% rated as 'Excellent' and 13% as 'Good'.

Devon's historic environment is equally remarkable, with a rich and distinctive tapestry of archaeological sites, historic buildings, towns, villages, and ancient landscapes. The county is notable for the density and quality of this heritage, with the Historic Environment Record referencing some 111,000 sites of interest, ranging in date from the Ice Age to the Cold War.

This includes nearly 1,700 nationally important Scheduled Monuments (over 5% of the English total), 21,600 Listed Buildings, 50 Registered Historic Parks & Gardens, and 10 Protected Wrecks. However, over 500 of these assets are on the national Heritage at Risk Register. The value of Exeter's Roman and medieval heritage is recognised in the designation of the walled city as one of only six Areas of Archaeological Importance in England. Dartmoor is one of the most important archaeological landscapes in Britain, with its numerous prehistoric stone rows, circles, burial cairns, settlements and field systems. While the international significance of the industrial heritage of the Tamar Valley is reflected in its World Heritage Site status.

However, Devon faces several environmental challenges. Many habitats are fragmented and threatened by pollution, invasive species, and climate change, which have contributed to huge losses of wildlife and habitat over the last century. Only 21% of Devon's rivers achieve good ecological condition and all fail on chemical pollution. Additionally, many of Devon's Sites of Special Scientific Interest (SSSIs) require improvement, as only 28% meet favourable condition. The steep topography leads to in excess of 40,000 properties being at risk of flooding from surface water. The county is unique in having two coastlines adding further risk from tidal flooding, as well as coastal erosion. With more frequent high-intensity rainfall events, hotter summers, warmer winters and continuing sea level rise, the impacts of climate change are being realised.

Greenhouse gas emissions are declining – 25% below 2010 levels – but not quickly enough to meet national targets. Per capita, annual greenhouse gas emissions are particularly high in the north and west of the county (about 9 tonnes) due to more reliance on private motorised transport, greater agricultural activity and more homes off the gas network in these areas due to their rural geography. This compares with 5.2 tonnes as the Southwest average, and just over 3 tonnes in Exeter.

Devon's environment is a vital asset for health and well-being, providing residents with important access to high-quality, wildlife and heritage-rich green spaces that support physical and mental wellness. It also serves as an outdoor classroom for our children, offering invaluable opportunities for learning and connection with nature. As the heart of the county's tourism industry, it attracts visitors while offering diverse recreational opportunities and enriching cultural heritage. With ongoing conservation and recovery efforts, this exceptional landscape can continue to be restored and thrive, ensuring its benefits for both residents and visitors for generations to come.

A.6 Planning and transport

Devon has a number of major national transport links including the M5 motorway and mainline rail links to London, Bristol and the Midlands. However, transport connectivity varies significantly across the County. Areas around Exeter, Plymouth and Torbay have relatively good road and rail and higher frequency public transport, while areas of south, west and northern Devon have poorer transport links and travel choices.

The greatest opportunities to expand active travel networks are in Devon's major growth areas. Cycling and walking infrastructure plans will enable developer contributions and new routes to promote active, healthier short-distance journeys for work, education, and leisure. In rural

areas, ambitious plans for multi-use trail networks, building on successful trails like the Exe Estuary and Tarka Trail will support the local economy and be attractive to people walking, wheeling, cycling, and, where possible horse riding.

Bus is the most used form of public transport in Devon and Torbay, with 25 million passenger trips during 2023-24. Although bus usage was 15% higher before the pandemic, it is recovering. Physical and technology-based priority measures in economic centres like Exeter, Newton Abbot, and Barnstaple will improve bus reliability and journey times, including routes serving the market and coastal towns. Electric buses on 'showcase' routes in northern Devon, Exeter, Cranbrook and between Torbay Newton Abbot will further increase the bus passenger quality offer.

Significant investment has been made to create a railway resilient to the impacts of climate change, particularly between Dawlish and Teignmouth. Rail usage in Devon and Torbay is 50% higher than in 2010, which has led to capacity issues at peak times on some rail lines. Newer trains have been announced for the Dartmoor Line and North Devon Line, which will address overcrowding, improve comfort for passengers and deliver better rail performance. A new railway and three new 'Devon Metro' stations have been introduced in the Exeter area with Okehampton Interchange under construction and Edginswell and Cullompton planned.

Rural accessibility challenges means many Devon residents remain reliant on their cars. Travel choices have been improved with integrated bus and rail initiatives connecting communities like Lynton, Lynmouth, Combe Martin, Ilfracombe, Tavistock, and Salcombe to 'hub' rail stations in Barnstaple, Okehampton, and Totnes. The new Okehampton Interchange will also serve as a bus and rail hub for rural communities in West Devon, Torridge, and parts of Cornwall.

Road improvements have focused on the most economically significant routes. The M5 between Cullompton and Exeter suffers from performance issues at peak and seasonal times, risking economic growth plans and connectivity to the rest of the County and region. Investment on local roads is targeted at better connecting communities to the major road corridors and where it can unlock growth opportunities. Notable projects include the North Devon Link, A382 in Newton Abbot, Cullompton Town Centre Relief Road, Dinan Way in Exmouth, and the Spine Road at Plymouth and South Devon Freeport.

A.7 Housing

While the cost of a home in Devon is similar to the England average (£286,800 vs £290,000 in 2023), its residents earn considerably less (£31,800 vs £35,100 in 2023), leading to a higher average full-time salary to house price ratio (9.0 vs 8.3). Rental affordability in the South West region than is less than anywhere else in the country outside of London and the South East. The high costs of buying and renting homes, as well as a shortage of both social and private rented accommodation in rural and coastal areas, is impacting on the social and economic viability of Devon communities. Lack of access to affordable homes in rural areas means people are unable to remain in the area.

Measures of housing quality in Devon also reveal challenges in Devon, partly relating to the age of the housing stock. A total of 43% of the Devon population is in the most deprived 20% of areas nationally for the measure, and 69% is above the national average. Further to this, levels

of fuel poverty in Devon are higher, with 14.3% of households classed as ‘fuel poor’ vs 13.1% for England.

According to Local Authority Housing Statistics for 2022-23, there were 585,723 dwellings in Devon. There were 11,985 local authority-owned dwellings in Devon, concentrated in East Devon (4,159), Exeter (4,805), and Mid Devon (2,969). Further to this, 58,464 dwellings were owned by a private registered social housing provider, and 1,754 were owned elsewhere in the public sector. A total of 30,038 households were on the housing waiting list.

There are significant areas of growth around the new communities of Cranbrook in East Devon and Sherford in the South Hams, which is near Plymouth, as well as adjacent to South West Exeter in Teignbridge, with aspirations for further growth in other selected locations. Across Devon and Plymouth housing completions are below the national average. There are also issues across Devon related to the affordability of housing, which has knock-on impacts to local labour markets.

A.8 Current Governance/Structures/Staffing.

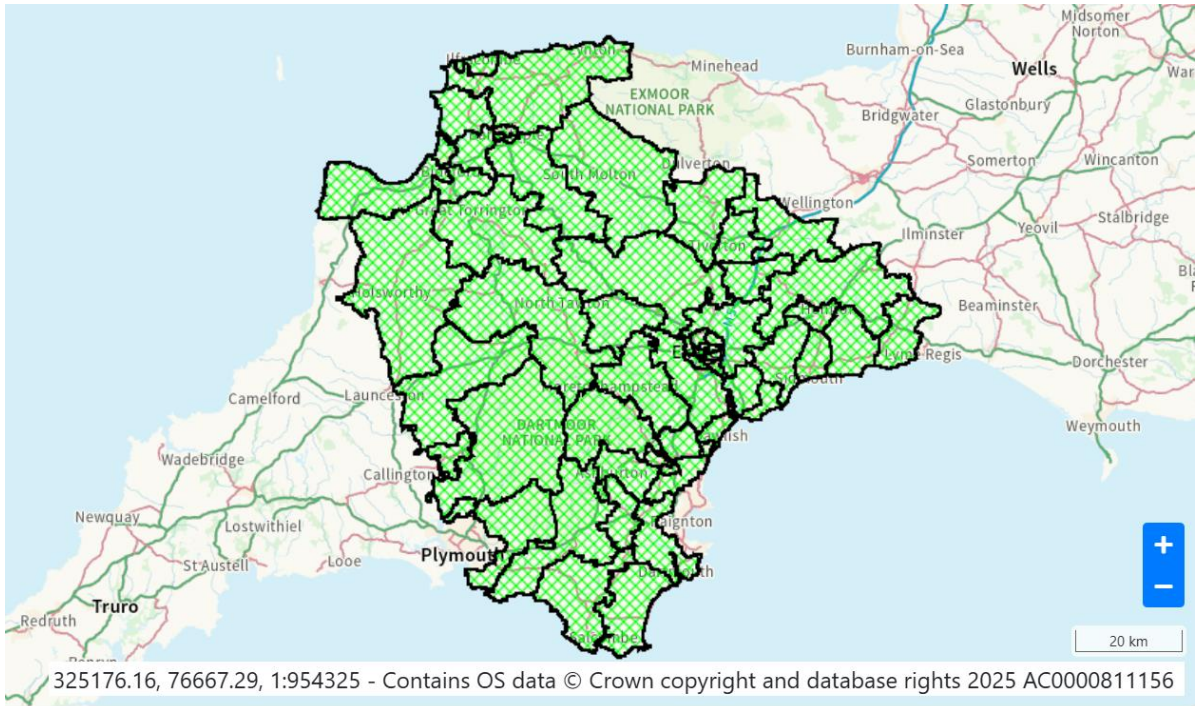
The current distribution of service responsibilities between the county and district councils dates to the 1974 reorganisation of local government. There is one county council and eight district councils. The unitary authorities of Plymouth City Council and Torbay Council were created in 1998.

The Devon and Torbay Combined County Authority involving the authorities within Devon and Torbay, but not Plymouth, is a recent construct which met for the first time on 19 March, 2025. But while the needs of the county’s communities have changed dramatically in the past decades, the model of local democracy has been unchanged for 50 years.

A.8.1 Governance in Devon

In total there are 481 elected members across the 11 councils in Devon. The breakdown of councillors across existing local government structures is as follows:

- Devon County Council – 60 members. There are 58 electoral divisions of which 56 have one member, and two divisions have two members.



- Torbay Council – 36 members. There are 16 wards of which five have three members; 10 have two members and one has one member.

Map of Torbay wards <https://www.torbay.gov.uk/council/voting-and-elections/wards>

- Plymouth City Council – 57 members. There are 20 wards of which 17 are represented by three councillors.

Map of Plymouth wards <https://www.plymouth.gov.uk/sites/default/files/2024-05/Councillor-Ward-Map-May-2024.pdf>

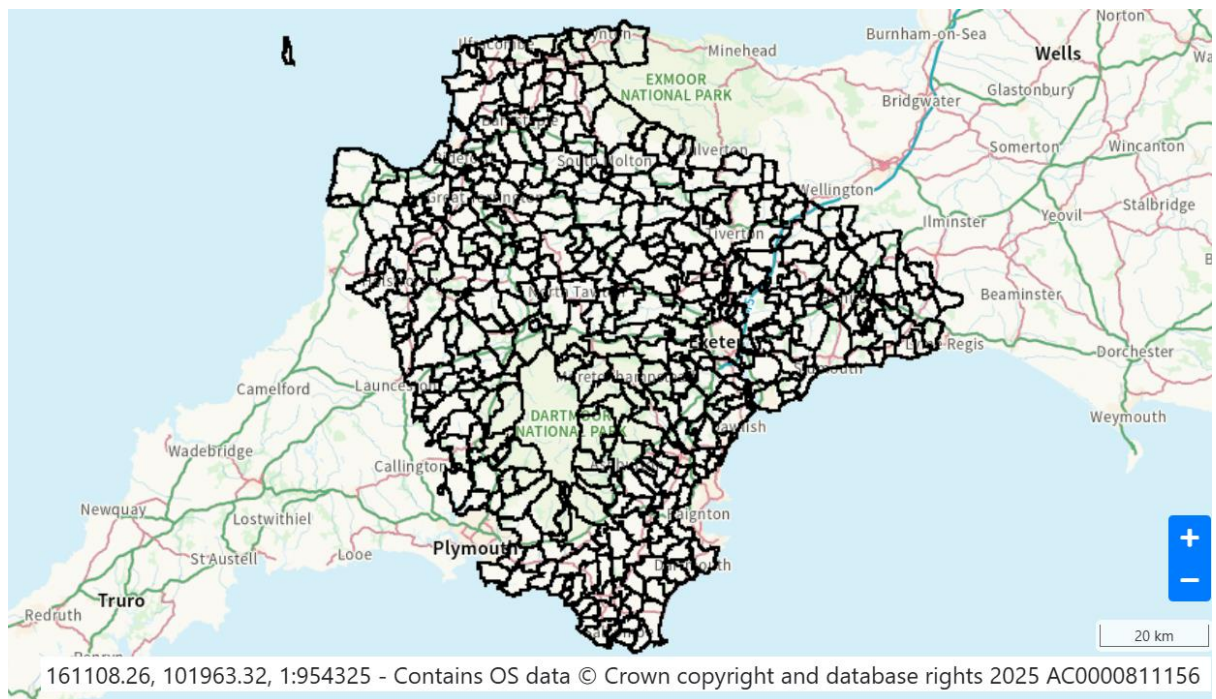
The breakdown of members across all councils is as follows:

District	Number of members	Number of wards
East Devon	60	30
Exeter	39	13
Mid Devon	42	22
North Devon	42	25
South Hams	31	20
Teignbridge	47	24
Torrige	36	23
West Devon	31	18
TOTAL	328	175
Plymouth CC	57	20
Torbay C	36	16
Devon CC	60	58

A.8.2 Other Governance

In Devon, there are over 400 parish and town councils, which vary greatly in size and the council tax they raise, and hence in the range of activity they undertake including the level of their precept.

Not all areas within Devon are parished. These include Exeter and Paignton and Torquay in the Torbay Council area.



There is a national park authority covering Dartmoor, created in 1997, which is the planning authority responsible for the unique environment and characteristics of the area. The Dartmoor National Park Authority area covers 350 square miles, with around 34,000 people living within its boundaries.

A total of 29% of the area covered by Exmoor National Park lies in north Devon, with the rest in Somerset.

A.8.3 Staffing

The 11 councils in Devon employ some 12,600 staff on the following basis:

Authority	Staff Numbers
Devon CC	5,260 (as at end of November 2024)
East Devon	540

Exeter	799
Mid Devon	546
North Devon	400
South Hams	570 (combined with West Devon)
Teignbridge	700
Torrige	299
West Devon	570 (combined with South Hams)
Plymouth CC	2,517
Torbay Council	1,022
Total	12,653

A.8.4 Budgets of Devon councils

The total net revenue spend budgeted across the 11 Devon councils was £2.07bn in 2024/25, the last year for which published, standardised data is available. The two largest elements of spend are employee costs and third party spend.

Funding of this £2.07bn net expenditure comprises £1.256bn from a range of government grants, retained business rates, and planned use of authority reserves. A total of £811m (39%) is raised through council tax precepts.

All 11 Devon councils face significant financial challenges to varying extents. The combined budget gap – the difference between estimated costs and funding – of Devon authorities is projected to increase year on year. The medium-term financial projections published by each authority vary, covering periods of between 2 and 5 years. Extrapolating available information indicates a potential projected funding gap of £180m by 2028/29.

The key financial risks more generally are:

- Demand and cost pressures particularly in adult social care, children and families, special educational needs and disabilities, home to school transport, homelessness/temporary accommodation, and national policy changes relating to these areas.
- Inflationary pressures driven by general inflation, national living wage growth, employment taxation, and supplier market sufficiency challenges.
- Dedicated Schools Grant High Needs Block (SEND) deficits, which cumulatively stands at £125m in Devon (DCC plus Plymouth and Torbay) as at March 2024.
- Changes in core spending power following the 2025 Comprehensive Spending Review, local government funding reform and the delayed business rates retention reset.
- Funding required for infrastructure arising from population growth, with linked considerations around borrowing capacity and debt.

A.8.5 Council tax

The combined council tax precepts of the 11 Devon authorities in 2024/25 total £811m. A further £25.6m is raised by town and parish councils across Devon.

The following table summarises the 2024/25 tax base and tax rate information for each billing area. It shows that in the current two-tier system the tax rates for county plus district authorities range from £1,882.45 (East Devon) to £1,977.26 (West Devon). Plymouth and Torbay unitaries are lower at £1,840.69 and 1,858.67 respectively.

	Number of Dwellings	Tax Base Band D Equivalents	Tax Base ÷ Dwellings	County / Unitary Band D Rate £	District Band D Rate £	Combined Band D Rate £
Devon CC	398,021	305,405	76.7%	1,715.67	-	-
East Devon	74,747	62,447	83.5%	1,715.67	166.78	1,882.45
Exeter	61,221	39,045	63.8%	1,715.67	180.37	1,896.04
Mid Devon	38,466	30,222	78.6%	1,715.67	232.16	1,947.83
North Devon	49,109	35,433	72.2%	1,715.67	210.39	1,926.06
South Hams	47,476	40,529	85.4%	1,715.67	190.96	1,906.63
Teignbridge	65,355	50,939	77.9%	1,715.67	196.41	1,912.08
Torrige	34,321	25,277	73.6%	1,715.67	189.50	1,905.17
West Devon	27,326	21,512	78.7%	1,715.67	261.59	1,977.26
Plymouth	123,273	75,389	61.2%	1,840.69	-	1,840.69
Torbay	68,736	47,374	68.9%	1,858.67	-	1,858.67
Totals	590,030	428,168				

A.8.6 Other public services in Devon

In the two-tier area of Devon, different types of councils are responsible for providing various services on behalf of their residents. From a delivery perspective this has an impact on how local government works with its key public sector partners in the county. The partners must each interact with representatives from all councils to ensure a consistent service experience is offered to the county's residents and businesses. Similarly, the 11 councils must build individual relationships with these key public partners.

The range of partnerships across the county and the sub-region clearly demonstrate a commitment to cross organisation working. However, the breadth and complexity of the networks that exist also highlights the sheer amount of work and relationship management that is needed to make these arrangements a success in a two-tier area.

The following all operate at county, sub-regional or regional level:

NHS Devon is the organisation responsible for most of the county's NHS budget and develops a plan to improve people's health and deliver care services. NHS Devon is one of 42 integrated care boards across the country and took over the statutory functions of clinical commissioning groups (CCGs) on 1 July 2022.

The One Devon Partnership, formerly known as the Integrated Care Partnership, is a new committee that includes a range of organisations, including councils across Devon, to drive integration by producing a strategy to join-up services, reduce inequalities, and improve people's wellbeing, outcomes and experiences. The partnership works closely with the county's three health and wellbeing boards in developing the strategy. The partnership also works with

and involves a wide range of other partners and sectors including primary care, carers, public health, housing and education.

Devon & Cornwall Police is accountable to the Police and Crime Commissioner for the Devon and Cornwall area and is responsible for crime prevention and enforcement across the whole of Devon, as well as the unitary council areas of Plymouth and Torbay. The force and Commissioner are important partners to the councils and, in addition to community safety roles, the force is an active member of the Joint Civil Contingencies Partnership. The police and Commissioner have been keen proponents of the benefits of working with other forces to increase scale economies and recognise the value of collaboration.

The Devon & Somerset Fire & Rescue Service is responsible for providing emergency response and fire prevention across the whole of Devon. The service was created through a merger in 2007 to deliver economies of scale to protect local service delivery across the two rural counties.

The Southwestern Ambulance Service NHS Foundation Trust is responsible for ambulance services across the whole Southwest region. This includes Devon, Somerset, the Isles of Scilly, Cornwall, Bristol, Gloucestershire, Dorset and Wiltshire.

In addition, the councils and public partners have developed successful local partnerships around important themes, in line with both national and local drivers. These strategic partnership arrangements are firmly embedded on a pan-Devon geography and demonstrate the value of collaboration.

A9 Local partnership working

Partnership working across Devon, between all local authorities, and with other parts of the public sector, community and business, is extensive, and a strong basis to work together towards local government re-organisation. Here we outline a range of the main current partnership arrangements:

- One Devon Integrated Care Board, a focus of collaboration between the NHS, all local authorities and community and voluntary partners, working to make the health system as strong and effective as possible.
- Health and Wellbeing Boards for Devon, Plymouth and Torbay – these bring together leaders from the local health and care system, and councils, to look at people’s health and social care needs as a single issue.
- Team Devon, which brings the county council, district councils, national park authorities and the Devon Association of Local Councils together to enable a joint approach to common issues and shared challenges, such as the housing crisis, accommodation for children in care, homelessness, financial vulnerability and water pollution. This informal partnership will be replaced from May 2025 by a formal Team Devon Joint Committee.
- Joint Civil Contingencies Partnership are responsible for providing the combined front-line local authority response to an emergency. The county council leads the partnership and has a duty civil contingencies officer arrangement in place providing cover seven

days a week. Each of the 11 councils has a separate civil contingencies officer to manage the response of their own organisation.

- Safer Devon Partnership – this is the statutory partnership required under the Crime and Disorder Act and pulls together county, district and regional arrangements to oversee community safety across the county.
- Devon Safeguarding Children Partnership - this brings together key statutory partners including the voluntary sector and representatives of children’s voices to ensure that Devon children and young people are safeguarded and enabled to thrive.
- Torbay and Devon Safeguarding Adults Partnership provides strategic leadership for adult safeguarding across Torbay and Devon.
- The Peninsula Sub-National Transport Board, which the County Council is a member of.
- Trading standards, TS Connect, is commissioned jointly by Devon County Council, Torbay Council, Plymouth City Council and Somerset Council.
- Adopt South West, a regional adoption agency, was set up in 2018, and involving Somerset and Devon County Councils and Plymouth and Torbay Councils as partners.
- Inshore Fisheries Conservation Authority
- Devon and Torbay One Public Estate Partnership
- Devon Climate Emergency Partnership

This is not intended as an exhaustive list, and we will consider the alignment of partnerships as part of the further development of options for reorganisation.

A10 Devolution arrangements and strategic joint working

Team Devon is a partnership of local authorities, the county, districts and Torbay, with our partners and key stakeholders, working together to tackle shared challenges and seize opportunities for our communities. By collaborating, we align strategies, optimise resources and deliver services more effectively to improve the lives of residents and support local businesses.

Together, we have made significant progress in areas such as economic development, infrastructure planning, and public service delivery. By pooling expertise and resources, we have been able to coordinate responses to major challenges, ensuring that our region benefits from a joined-up approach. This has strengthened our ability to advocate for Devon and Torbay at the national level and attract investment into our communities.

Building on this strong foundation, with the Government’s support, we have now established the Devon and Torbay Combined County Authority to take greater control of our region’s future. A key ambition of the Combined County Authority is to maximise economic potential and support local businesses. Despite having nearly 50,000 businesses providing around 473,000 jobs, our region’s productivity remains below the UK average. To close this gap, we will focus on developing a skilled workforce, securing new investment, and ensuring that education and training align with local industry needs. Devolving adult education functions will help us better equip people with the skills needed to access high-value jobs, strengthening our economy for the long term.

Supporting businesses is at the heart of our plans. Through the Combined County Authority, we will deliver investment with strong local democratic accountability, provide a clear and influential voice for businesses and skills representatives, and make it easier for businesses to access advice and support. By backing high-growth sectors alongside our region's traditional strengths, we aim to create a more productive, sustainable, and higher-wage economy that benefits everyone.

By working together through the Devon and Torbay Combined County Authority, we are creating a stronger, more prosperous future. We are committed to driving economic growth, improving infrastructure, supporting businesses, and ensuring that local people and communities have a real say in decisions that affect them. This is a vital step towards securing more investment, creating better jobs, and delivering lasting improvements for Devon and Torbay.

Building on our work to date, we are continuing discussions towards establishing a Mayoral Strategic Authority across the whole of Devon and, potentially, with Cornwall, if they choose to join us.