



#### **Oversight and Governance**

Chief Executive's Department Plymouth City Council Ballard House Plymouth PLI 3BJ

Please ask for Jamie Sheldon T 01752 668000 E democraticservices@plymouth.gov.uk www.plymouth.gov.uk Published 14 November 2025

#### **CABINET**

Monday 24 November 2025 7.30 pm Council House, Plymouth

#### **Members:**

Councillor Evans OBE, Chair Councillor Laing, Vice Chair

Councillors Aspinall, Briars-Delve, Dann, Haydon, Lowry, Penberthy, Cresswell and Stephens.

Members are invited to attend the above meeting to consider the items of business overleaf.

This meeting will be webcast and available online after the meeting. By entering the meeting room, Councillors are consenting to being filmed during the meeting and to the use of the recording for the webcast.

The Council is a data controller under the Data Protection Act. Data collected during this webcast will be retained in accordance with authority's published policy.

You can watch any of our webcast meetings on <u>YouTube</u>. For further information on attending Council meetings and how to engage in the democratic process please follow this link - <u>Get Involved</u>

**Tracey Lee**Chief Executive

#### **Cabinet**

#### **Agenda**

#### Part I (Public Meeting)

#### I. Apologies

To receive apologies for absence submitted by Cabinet Members.

#### 2. Declarations of Interest

Cabinet Members will be asked to make any declarations of interest in respect of items on this agenda.

3. Minutes (Pages I - 8)

To sign and confirm as a correct record the minutes of the meeting held on 10 November 2025.

#### 4. Questions from the Public

To receive questions from the public in accordance with the Constitution.

Questions, of no longer than 50 words, can be submitted to Democratic Services, Plymouth City Council, Ballard House, Plymouth, PLI 3BJ, or email to <a href="mailto:democraticservices@plymouth.gov.uk">democraticservices@plymouth.gov.uk</a>. Any questions must be received at least five clear working days before the date of the meeting.

#### 5. Chair's Urgent Business

To receive reports on business which, in the opinion of the Chair, should be brought forward for urgent consideration.

#### **Items for decision**

6. Plymouth City Council's Local Government Reorganisation (Pages 9 - 312) Proposal for Devon:

#### **Cabinet**

#### Monday 10 November 2025

#### PRESENT:

Councillor Laing (Vice Chair, in the Chair)
Councillors: Aspinall, Briars-Delve, Cresswell, Dann, Haydon, Lowry, Penberthy and Stephens.

Also in attendance: Chris Avent (Green Estate Manager), Si Bellamy (Chief Operating Officer (virtual)), Liz Bryant (Head of Legal Services), Glenn Caplin-Grey (Strategic Director for Growth), Amanda Davis (Service Director, Education, Participation and Skills), Kat Deeney (Head of Environmental Planning), Matt Garrett (Service Director for Community Connections), Tracey Lee (Chief Executive), Professor Steve Maddern (Director of Public Health), Jamie Sheldon (Senior Democratic Advisor) and Ian Trisk-Grove (Service Director for Finance).

The meeting started at 3.30 pm and finished at 3.59 pm.

Note: The full discussion can be viewed on the webcast of the City Council meeting at <a href="https://www.plymouth.gov.uk">www.plymouth.gov.uk</a>. At a future meeting, the Council will consider the accuracy of these draft minutes, so they may be subject to change. Please check the minutes of that meeting to confirm whether these minutes have been amended.

#### 49. **Declarations of Interest**

There were no declarations of interest made.

#### 50. **Minutes**

The minutes of the meeting held on 13 October 2025 were agreed as a correct record.

#### 51. Questions from the Public

There were no questions from members of the public.

#### 52. Chair's Urgent Business

There were no items of Chair's urgent business.

#### 53. Finance Monitoring Report Month 6

Councillor Mark Lowry (Cabinet Member for Finance) introduced the Finance Monitoring Report Month 6 and discussed:

a) The report set out the revenue monitoring position of the Council at the end of September 2025, forecasting an adverse variance of £8.754 million;

- This variance reflected ongoing financial pressures across several key service areas, despite significant efforts by members and officers to deliver cost savings against delivery plans;
- c) Adult Social Care continued to experience increased demand, particularly in home placements, resulting in a reported budget pressure of £2.2 million;
- d) Children's Services faced rising placement costs, with residential and unregistered placements exceeding budget, creating a pressure of £3.7 million;
- e) Community Connections remained under strain due to rising costs of temporary accommodation and increasing demand, maintaining a pressure of £0.91 million;
- f) Customer and Corporate Services reported a budget pressure of £1.2 million, largely due to unbudgeted facility surveys, resulting repairs, and associated maintenance costs;
- g) Costs associated with the directly elected Mayor referendum exceeded expectations by £169,000;
- h) The Growth Directorate was unable to realise a £1.3 million income target from the Energy to Waste Plant profit share arrangement due to scheduled maintenance downtime;
- i) £6.5 million of savings had been achieved in-year against target, with a further £3.7 million in progress;
- j) Opportunities to reprofile available reserves existed but would not fully address the shortfall;
- Work would continue with the Section 151 Officer and Chief Executive's team to maintain focus on in-year delivery and address high placement costs across children's, adults, homelessness and SEND;
- I) The five-year capital programme stood at £372 million, with a revised forecast of £161 million for the current financial year, reflecting prudent reprofiling of £17 million and offset by £12 million of new expected spend;
- m) 76.8% of the capital programme was funded through grant contributions and inservice supported borrowing;
- n) All prudential indicators remained within approved limits, confirming that borrowing was managed within prudent boundaries;
- o) For the first time, the impact of the Dedicated Schools Grant (DSG) deficit on the revenue budget was reported;
- p) The capital monitoring and indicators demonstrated that the investment plan was affordable and sustainable, operating within a robust financial framework;

q) Officers across all directorates were acknowledged for their continued work in maintaining mitigation actions in a challenging financial environment.

lan Trisk-Grove (Service Director for Finance) added:

- r) The Month 6 report represented a full half-year review and clearly set out the challenges facing the Council into the second half of the year;
- s) Officers remained focused on delivering in-year savings and addressing the financial tasks ahead.

In response to questions, the Cabinet discussed:

- t) The pressures in Children's Services were not unique to Plymouth, with other councils reporting similar overspends, including one projecting an £8.2 million overspend and another facing a £5 million pressure;
- u) Robust workstreams were in place to address the challenges in residential placements, which were a national issue.

#### The Cabinet agreed:

- I. To note the forecast revenue monitoring position at Month 6 as an adverse variance of £8.754 million, with further risks highlighted;
- 2. To note that the overall Capital Budget 2025–2030 was revised to £372.311 million, as shown in Table 18, with reconciliation and detail of the movements in the quarter set out in Tables 18 and 21, and to recommend these amendments to City Council for approval;
- 3. To note the performance against prudential indicators for Quarter 2 2025–2026, detailed in Section 13 of the report.

#### 54. Plan for Nature and People

Councillor Tom Briars-Delve (Cabinet Member for Environment and Climate Change) introduced the Plymouth Plan for Nature and People and discussed:

- a) Historically, there had been a perceived disconnect between the Council's respect for nature and the excellent work already being delivered by the Environmental Planning Department;
- b) There was a need to rebuild trust, rethink engagement, raise the prominence of nature in decision-making, and develop an ambitious long-term vision for nature recovery across the city;
- c) A new strategy was commissioned with the vision of co-creating the plan with communities and environmental groups;

- d) Hundreds of residents were engaged through public events, focus groups, and a steering group with external partners, with further changes made following final consultation to demonstrate responsiveness;
- e) The plan focused not only on enhancing nature but also on the relationship between nature and communities, including health and wellbeing benefits, sustainable skills and jobs, social cohesion, volunteering, and children's personal development;
- f) The title of the plan was amended to reflect the equal importance of people and nature;
- g) The plan included a five-year action plan detailing delivery commitments and measurement frameworks, including:
  - i. Planting 1,000 street trees in low canopy urban areas;
  - ii. Co-producing neighbourhood-level landscape masterplans;
  - iii. Achieving Green Flag status for 12 sites;
  - iv. Establishing new community orchards and free culinary herbs in major parks;
  - v. Expanding ecotherapy and green social prescribing;
  - vi. Creating Plymouth's first natural capital investment prospectus and aiming to raise £50 million of external green investment by 2030;
- h) The plan reflected and connected existing work in Plymouth, including:
  - i. The UK's first National Marine Park;
  - ii. The Ocean City Nature habitat bank;
  - iii. The Green Communities Team partnership with the National Trust;
  - iv. The BRIC project for flood resilience;
  - v. Plymouth Natural Grid, which improved 50 hectares of habitat and supported apprenticeships and Kickstarters;
  - vi. The planting of 50,000 trees by the Plymouth and South Devon Community
  - vii. Initiatives at Derriford Community Park including beaver reintroduction, youth work, and ecotherapy at Poole Farm;
- Most of the initiatives were grant-funded, and special thanks were given to Kat Deeney and Chris Avent for their decade of work, as well as to officers for coordinating feedback and incorporating extensive revisions;
- j) The Cabinet and wider Council departments were thanked for their constructive input over the past year, and the public's engagement was acknowledged as central to the plan's development;
- k) The plan was described as Plymouth's plan for nature and people, co-created and owned by the city, with a public launch scheduled for the following day at Saltram.

Kat Deeney (Head of Environmental Planning and Chris Avent (Green Estate Manager) added:

- l) Communities, stakeholders, and partners had engaged constructively throughout the process, offering challenge and solutions;
- m) The plan had strong join-up across Council departments, including Children's Services and Public Health, and would deliver across multiple agendas.

In response to questions, the Cabinet discussed:

- n) The plan was a strategic framework that narrated Plymouth's relationship with nature, particularly for younger generations;
- o) The plan aligned with recent curriculum developments, including the review led by Becky Francis, which emphasised climate and nature in education;
- p) Nature experiences were important for young people's mental health and wellbeing, and the plan supported social prescribing and curriculum enrichment;
- q) The plan marked a significant shift in the city's approach, complementing existing blue, grey, and green strategies and supporting Plymouth's branding as a "life of adventure" destination;
- r) The integration of branding elements into the plan was noted and welcomed.

#### The Cabinet agreed:

- To endorse the final version of the Plymouth Plan for Nature and People to act as a strategic delivery framework integrating nature and natural spaces into the city's growth;
- 2. To approve the creation of a Year One Action Plan for delivery in 2026.

#### 55. Medium Term Financial Strategy 2025/26-2029/30

Councillor Mark Lowry (Cabinet Member for Finance) introduced the Medium-Term Financial Strategy 2025/26 to 2029/30 and discussed:

- a) The strategy set out the Council's expected expenditure and income over a five-year period and was produced annually;
- b) The Council had previously received only one-year funding settlements from Government, but now had a three-year settlement, which provided greater transparency. Challenges remained due to the ongoing Fairer Funding Review, Business Rate Reset, and the treatment of the Dedicated Schools Grant (DSG) deficit:
- c) The Council faced ongoing financial pressures in Adult and Children's Social Care, homelessness, and SEND provision. These figures represented real people with complex needs and required unwavering support;

- d) These pressures could not be resolved through short-term fixes, and the strategy proposed a bold shift to a prevention-first approach, involving investment in early help, smarter service design, and integrated community-based models;
- e) The approach aimed to reduce reliance on high-cost crisis-driven interventions and move towards a more sustainable public service delivery model;
- f) Progress was already being made, including:
  - i. Expansion of enablement in Adult Social Care;
  - ii. Strengthening placement sufficiency in Children's Services;
  - iii. Investment in new temporary accommodation to meet homelessness demand;
- g) Transformation alone would not close the financial gap, and the strategy identified a savings requirement of £13.7 million for 2026/27, with all directorates engaged in developing proposals to meet this challenge;
- h) Plymouth was well placed to benefit from national investment programmes, including its designation as a National Defence Growth Area and inclusion in the New Towns Task Force programme, which supported housing delivery, infrastructure investment, and economic growth;
- The strategy was not just a financial document but provided the fiscal backdrop for setting a balanced budget for 2026 and outlined the roadmap for navigating the next five years;
- j) The Council remained committed to delivering for Plymouth residents and would continue to work with members, partners, and communities throughout the budgetsetting process;
- A public engagement exercise had been launched alongside the strategy to gather feedback from residents and businesses on priorities, financial challenges, and ideas for savings or income generation;
- I) The survey was accessible via the Council's website, social media, and email bulletins, and residents were encouraged to participate;
- m) The provisional settlement in December 2025 would provide further clarity, and the strategy would be updated and brought back to Cabinet and Scrutiny before going to Full Council and Budget Scrutiny in January;
- n) Councillor Lowry thanked all officers involved in producing the strategy, with particular thanks to lan Trisk-Grove for his work during a period of significant change.

Ian Trisk-Grove (Service Director for Finance) added:

o) The upcoming policy statement, expected the following week, would provide greater visibility on funding formula changes and the outcome of the Fair Funding Review;

#### Page 7

- p) The multi-year settlement would support improved financial planning, and work would continue with members and directors over the coming months to finalise the full budget;
- q) Gratitude was expressed to all involved for their engagement and efforts to date.

In response to questions, the Cabinet discussed:

- r) The importance of public engagement in the budget-setting process, with feedback informing Budget Scrutiny and subsequent Council decisions;
- s) Clarification was provided on the apparent increase in the net revenue figure from approximately £250 million to £325 million, which reflected the inclusion of previously uncertain grant funding into the net revenue position, offering greater maturity and stability.

#### The Cabinet agreed:

1. To approve and recommend the Medium-Term Financial Strategy 2025/26-2029/30 to City Council at its meeting on 24 November 2025.

This page is intentionally left blank

#### **Cabinet**



Date of meeting: 24 November 2025

Title of Report: Plymouth City Council's Local Government

**Reorganisation Proposal for Devon** 

Lead Member: Councillor Tudor Evans OBE (Leader)

Lead Strategic Director: Tracey Lee (Chief Executive)

Author: Paul Barnard, MBE, MRTPI, CIHM, FAcSS

Contact Email: Paul.barnard@plymouth.gov.uk

Your Reference: PWB/LGR/DEVO/251124

Key Decision: Yes

Confidentiality: Part I - Official

#### **Purpose of Report**

The purpose of this report is to seek Cabinet's approval to the submission of Plymouth City Council's Local Government Reorganisation Proposal for Devon in response to the Statutory Invitation issued by the Secretary of State for Housing, Communities and Local Government under Section 2 of the of the Local Government and Public Involvement in Public Health Act 2007. The proposal sets out a statutorily compliant "base case" based on whole district building blocks alongside a preferred option of four unitary councils to replace the existing two-tier structure in Devon comprising an "expanded Plymouth," an "expanded Exeter," an "expanded Torbay," alongside a new "Devon Coast and Countryside" unitary council.

#### **Recommendations and Reasons**

#### That Cabinet:

I. Agrees the "Plymouth City Council's Local Government Reorganisation Proposal for Devon" document as set out in Appendix A and approves its submission to the Secretary of State for Housing, Communities and Local Government.

<u>Reason</u>: To respond to the statutory invitation issued by the Secretary of State for Housing, Communities and Local Government to Plymouth City Council on 05 December 2024 and to comply with the requirement to submit final proposals by 28 November 2025.

2. Delegates authority to the Chief Executive, in consultation with the Leader, to make any final changes to the "Plymouth City Council's Proposal for Local Government Reorganisation in Devon" before the deadline for submission.

<u>Reason</u>: To enable the Chief Executive to make any necessary final changes to the City Council's proposal as necessary in order to meet the Government's submission deadline of 28 November 2025.

#### Alternative options considered and rejected

# Option 1: To not respond to the Government's statutory invitation to Plymouth City Council to submit a proposal for local government reorganisation in Devon.

This option was rejected as this would not be in the best long-term interests of local residents and businesses in terms of the sustainability of services provided. It would also not be in the best long-term interests of the city in relation to its unique and ambitious growth agenda. The absence of any submission to the Government by the City Council also risks a proposal being agreed for the rest of Devon that would undermine its long-term future.

# Option 2: To submit a different proposal for local government reorganisation in response to the statutory invitation.

At its meeting on 17 March 2025 the City Council considered 3 options and approved the "Greater Plymouth" option now being put forward as part of the final proposal taking account of the feedback from the "Big Community Conversation". The City Council has also had to respond to the Government's requirement set out in the letter of 15 May 2025 for its proposal to relate to the whole area of Devon. The City Council considers that its proposal for four unitary councils for Devon represents the best structure for local government in the area and the one that best addresses the opportunities for wider devolution as and when its preferred Peninsula Mayoral Strategic Authority is created. The option to submit a different proposal has therefore been rejected.

#### Relevance to the Corporate Plan and/or the Plymouth Plan

Establishing an "expanded Plymouth," an "expanded Exeter", an "expanded Torbay," alongside a new "Devon Coast and Countryside" unitary council, will maximise the ability to unlock new funding streams, new powers and achieve operational service efficiencies across the whole of Devon. Further innovations in service delivery would enable the priorities set out in the Corporate Plan to be achieved over the long-term. The proposal for an "expanded Plymouth" will help achieve all six of the Corporate Plan priorities and specifically will secure long-term growth opportunities which will meet the Corporate Plan commitments to build more homes for social rent and affordable ownership and deliver green investment, jobs, and skills. The proposal for local government in Devon has been developed in accordance with the Corporate Plan values of "democracy," "responsibility," "fairness," and "co-operation." The proposal for an "expanded Plymouth" and for four unitary councils to replace the existing two-tier councils in Devon will also help in achieving the Plymouth Plan objectives of creating a "healthy city," a "growing city," an "international city" and a "regional city."

#### Implications for the Medium-Term Financial Plan and Resource Implications:

Plymouth City Council will develop and agree a Medium-Term Financial Plan and budget for the current council (on current City Council boundaries) until such time as a decision is made by the Government on future arrangements for local government in Plymouth and Devon. As set out in the attached proposal, the four unitary councils would deliver operational efficiencies and improve financial sustainability for local government across the whole of Devon, including Plymouth. The initial cost of implementing the proposal (if agreed) would be funded from one-off resources, paid back through efficiency savings over the first three to four years of the expanded Plymouth City Council.

#### **Financial Risks**

The principal financial risks relate to uncertainty in the financial estimates prepared to support the proposal. The financial analysis is based on data collated from councils across Devon, as well as published financial information; however, all information used is historic and the level of demand, cost or income could vary from the assumptions used in financial modelling. The main mitigation for any financial risks relates to the modelling being undertaken to a detailed level of granularity and in collaboration with a working group of finance officers across Devon. In addition, specialist external consultants have also been used to verify budgets and costs. The full proposal attached as Appendix A sets out the financial risks in more detail.

#### **Legal Implications**

In February 2025, the Secretary of State issued an invitation to all councils in Devon, including Plymouth City Council, to submit proposals for structural change to include the creation of new unitary authorities. The statutory basis for this invitation is section 2 of the Local Government and Public Involvement in Health Act 2007 (the Act), brought about as a result of the Government's English Devolution White Paper (2024). The White Paper sets out the Government's commitment to simplify the structure of local government with a view to delivering significant savings, more sustainable and higher quality services, and improved accountability.

The Act permits four types of proposal for a single tier of local government based on whole district building blocks. The Council must therefore submit a base case proposal based on existing district boundaries to satisfy this statutory requirement. However, the Secretary of State has a power of modification under section 7 of the Act to make modifications to proposals where he has received a request to do so. Cabinet is therefore being asked to approve a ministerial request for a modification to the Council's base case proposal to enable the proposed four unitary council model for Devon to be brought forward, with three of those councils extending their existing boundaries.

The Secretary of State may implement proposals, with or without modification, but must undertake a statutory consultation exercise before any Structural Changes Order (SCO) can be made. The consultation must include all affected authorities and others considered appropriate and will be led by Government. This statutory consultation process is separate to the Council's own consultation and engagement activity which has already been undertaken.

The implementation of proposals submitted to the Secretary of State will ultimately require a SCO to bring into being any newly created unitary authorities and to deal with matters such as the transfer of property, contracts, and staff to the newly created entity. Alternatively, the Secretary of State may permit existing unitary authorities to be "continuing authorities" with their requested boundary change without the need to abolish the existing authority. This option is being proposed for Plymouth and Torbay in order to reduce the significant financial, resource, and service delivery implications that the creation of a new authority would necessitate.

In relation to the duty under Section 17 of the Crime and Disorder Act 1998 for the City Council to exercise its various functions with due regard to their likely effect on, and the need to do all that it reasonably can to prevent, (a) crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and (b)the misuse of drugs, alcohol and other substances in its area; and (c) re-offending in its area; and (d) serious violence in its area, the local government proposal for Devon to have four unitary authorities replacing the existing two-tier structure has been discussed with the Chief Constable of Devon and Cornwall Police. The City Council has also considered the Section 17 duty under the 1998 Act and concluded that its proposal for four unitary councils will be consistent with it.

#### **Carbon Footprint (Environmental) Implications:**

Through devolution, the Government has committed to making Britain a clean energy superpower. It therefore sees a major role for the new Mayoral Strategic Authorities in achieving this aim and addressing climate change. The Power and Partnership: Foundations for Growth White Paper refers to several initiatives which the City Council has been active in delivering such as Warm Homes, the Social Housing Decarbonisation Fund, the Public Sector Decarbonisation Scheme, and the heat network Advanced Zoning Pilot which will form part of the Integrated Settlement for 2025/2026. Whilst the White Paper sees a major role for Mayoral Strategic Authorities, Plymouth City Council has been very active in this area and the creation of an expanded boundary will open up further opportunities for decarbonisation initiatives across the wider area of an "expanded Plymouth" and also through the work of the South West Peninsula Mayoral Strategic Authority. A single-tier structure provides further opportunities for more coordinated planning across functional areas to deliver more joined-up decarbonisation initiatives. The integration of strategic planning, transport planning, infrastructure coordination, housing delivery and climate change initiatives will be easier if provided by one authority. This applies not only to an expanded Plymouth authority but all four unitary authorities that are part of Plymouth's local government reorganisation proposal for Devon. A Climate Impact Assessment (CIA) has been undertaken and concludes that the overall impact of the local government proposal prepared by the City Council on climate and environmental outcomes is, at this strategic stage, neutral. This reflects the high degree of uncertainty surrounding future governance arrangements, service delivery models, and spatial planning frameworks, which precludes robust forecasting. The assessment does not identify direct positive or negative climate impacts but highlights several areas where future implementation could influence outcomes. The proposal demonstrates a strategic commitment to environmental responsibility, but its climate impact will depend entirely on future implementation decisions. The assessment recommends tailored mitigation planning during the implementation stage to ensure climate resilience and environmental integrity are upheld across the expanded geography.

#### Other Implications: e.g. Health and Safety, Risk Management, Child Poverty:

\* When considering these proposals members have a responsibility to ensure they give due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination, and promote good relations between people who share protected characteristics under the Equalities Act and those who do not.

There are a number of key strategic risks that apply to this local government reorganisation process. The main risk is that the Secretary of State accepts the base case proposal to not alter Plymouth City Council's boundary and/or accepts alternative proposals being developed by Devon County Council for a huge single unitary council across the whole of Devon, or the "I-4-5" proposal by the district councils which assumes Plymouth would stay on its existing boundary. All of these would severely constrain Plymouth's ability to maximise the opportunities for growth and limit the ability to secure more joined up services for those settlements that are already functionally connected to the city. A further risk is that the Secretary of State accepts other proposals being put forward that will create a situation whereby the South West Peninsula Mayoral Strategic Authority is dominated by authorities that put urban issues as secondary and where ambitions for growth are muted. The main mitigation for

these risks has been to establish a strong consensus with Exeter City Council and to ensure that the final proposal is of the highest quality that sets out a compelling case for the four unitary council proposal advanced by the City Council, with a strong overarching vision and supporting evidence base. Another risk, which was also highlighted in the report on devolution agreed by the City Council on 09 January 2025, is the possibility of the process of devolution and reorganisation diverting capacity and resources away from the continuing delivery of high-quality services to residents and businesses. The key mitigation for this risk is to adopt a proportionate approach to the process, and the establishment of the Local Government Reform Team with dedicated resources with the ability to commission external specialist capacity to undertake and complete key future workstreams, whilst maintaining existing service delivery across the council.

By extending Plymouth's strategic expertise in planning, transport, regeneration, and climate change across a wider geographical area, the proposal has the potential to improve service coordination and foster greater consistency in public service performance standards. An Equality Impact Assessment (EIA) has been undertaken in relation to Plymouth City Council's local government reorganisation on residents across Plymouth and the "expanded Plymouth" area, using the nine protected characteristics set out in the Equality Act 2010. The Equality Impact Assessment identifies strategic risks for people with protected characteristics, particularly relating to service continuity, accessibility, and representation. In terms of potential negative impacts, the EIA identifies potential risks in relation to minority voices being inadvertently diluted in a larger authority, rural access challenges, the loss of specialist services if rationalised or amalgamated and the uncertainty associated with the transitional period leading up to Vesting Day. These risks are inherent with local government reorganisation in England and will be similar for the other areas of Plymouth's proposals for Devon. While the Equality Impact Assessment identifies potential risks for people with protected characteristics, these risks are not inherent to the reorganisation but depend on how it is implemented. The reorganisation may also create opportunities to improve outcomes for minority groups, including care-experienced individuals, disabled residents, and young people, through more integrated service delivery, strategic coordination, and inclusive governance. Realising these benefits will require careful planning, sustained engagement, and targeted mitigation. Key measures should include maintaining existing parish and town council structures, ensuring day-one continuity of service delivery, and establishing early arrangements for collecting and monitoring equality data across the expanded councils. With these safeguards in place, implementation can proceed cautiously while maximising the potential for positive impact.

#### **Appendices**

\*Add rows as required to box below

Ref.	Title of Appendix	<b>Exemption Paragraph Number</b> (if applicable If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.					indicate dule 12A	
		I	2	3	4	5	6	7
Α	Local Government Reorganisation Cabinet Briefing Paper							
В	Plymouth City Council's Local Government Reorganisation Proposal for Devon (November 2025)							
С	Plymouth City Council's Local Government Reorganisation Proposal for Devon (November 2025) Appendices							

101/ L	Page 14	PLYMOUTH CITY COUNCIL					
Appendix I – Finance							
Appendix 2 – List of F	arishes						
Appendix 3 – Impleme	entation Plan						
Appendix 4 – Letters	of Support						
Appendix 5 – List of fi	gures and tables						
Appendix 6 – List of a	cronyms						
Appendix 7 – Key ter	ms explained						
Appendix 8 – Sources							
Appendix 9 – Climate	Impact Assessment						
Appendix 10 – Equalit	ies Impact Assessment						
(One further appendix November 2025)	to follow w/c 17						
D Plymouth LGR Engage	ment Report						

#### **Background papers:**

Title of any background paper(s)	Exem	otion P	aragrap	oh Num	nber (if	applicab	le)
	is not for	publication	n by virtue	is confiden of Part To ing the rele	f Schedule		
	ı	2	3	4	5	6	7

#### Sign off:

25		Fin	ITG.2 5.26.0 78	Leg	LS/00 003 I 97/34 /LB/0 4/1 I/	Mon Off	N/A	HR	N/A	Assets	N/A	Strat Proc	N/A
----	--	-----	-----------------------	-----	--	------------	-----	----	-----	--------	-----	---------------	-----

Originating Extended Leadership Team member: Tracey Lee, Chief Executive

Please confirm the Strategic Director(s) has agreed the report? Choose Yes

Date agreed: 14 November 2025 (Tracey Lee, Chief Executive)

Cabinet Member approval: Councillor John Stephens, Cabinet Member for Strategic Planning and

Transport (as per delegated authority)

Date approved: 14 November 2025

#### **CABINET 24 NOVEMBER 2025**

# PLYMOUTH CITY COUNCIL'S PROPOSAL FOR LOCAL GOVERNMENT REORGANISATION IN DEVON



#### 1.0 INTRODUCTION

- 1.1 On 16 December 2024, the Government published a White Paper (Power and Partnership: Foundations for Growth) setting out their plans for devolution and local government reorganisation, with the aim of shifting power away from Whitehall and simplifying local government structures. Devolution and local government reorganisation are separate but very much related processes to fundamentally transform local government for the future. The Government have stated very clearly that local government reorganisation will be based on the principle of unitarisation, with the current two-tier system abolished. The Government sees such an approach as central to its future growth ambitions to achieve national economic renewal.
- 1.2 On 09 January 2025, in response to a report on the English Devolution White Paper, the City Council resolved (Minute 51 refers) the following:

The Government has clearly stated that large Strategic Authorities led by directly elected mayors represent their preferred path for devolution, viewing this model as the most effective way to transfer power and resources from Westminster to local regions. In response to this clear policy direction, Plymouth City Council strongly advocates for the establishment of a South West Peninsula Mayoral Strategic Authority. This proposed authority would encompass the combined geography of Cornwall, Devon, Plymouth, and Torbay.

The necessity to expand the Council's administrative boundaries to achieve the scale required for future sustainability. This must be carefully balanced with preserving both Plymouth's distinctive identity and the identities of neighbouring communities. Work to develop appropriate options and a business case for this will now commence.

- 1.3 On 05 February 2025 the then Minister of State for Local Government and English Devolution, Jim McMahon OBE MP, wrote to all the leaders of two-tier and unitary councils stating that the Government had a clear vision for simpler, more sustainable local government structures, alongside plans for the transfer of power out of Westminster through devolution. This letter also set out a formal legal invitation under powers set out in the Local Government and Public Involvement in Health Act 2007 to submit proposals for a single tier of local government and in an attached schedule identified the Secretary of State's guidance and criteria for unitary government. The letter proposed a timetable for the submission of an interim plan by 21 March 2025 and final proposals by 28 November 2025. The Government made clear that all two-tier areas will have to comply with the requirements of the White Paper. It stated that it would prefer agreement from authorities in developing a single proposal, but if agreement cannot be reached, the Government will accept competing proposals and will decide on the best way forward to ensure its overall aims for better and more efficient service delivery are achieved.
- 1.4 On 17 March 2025 the City Council unanimously endorsed (with one abstention) the Plymouth Local Government Reorganisation Interim Plan setting out a proposal to extend the boundary of Plymouth City Council to encompass the surrounding 13 parishes currently within South Hams District Council (Minute 77 refers).
- 1.5 On 19 March 2025, Cabinet approved and agreed to the Plymouth Local Government Reorganisation Interim Plan being submitted to Government setting out the proposed boundary change

to encompass the surrounding 13 parishes currently within South Hams District Council (Minute 122 refers). The Interim Plan was subsequently submitted to Government by the deadline of 21 March 2025.

- 1.6 On 15 May 2025 the Government wrote to all councils in Devon to provide feedback on their Interim Plans. In welcoming the initial thinking on the various options set out in these Interim Plans the Government made clear that:
  - 1. Effective cooperation between all councils across the invitation area was crucial.
  - 2. Any boundary change needed to be justified.
  - 3. Each council could only submit a single proposal by the deadline of 28 November 2025, this single proposal needing to relate to the whole area; the entirety of Devon.
  - 4. There should be further details and evidence submitted on costs, efficiencies, and outcomes.
  - 5. In relation to the population size of 500,000 set out in the Statutory Invitation guidance and in the English Devolution White Paper this was described as a guiding principle, not a hard target and the rationale for the proposed approach should be set out clearly.
  - 6. Where disaggregation is proposed (particularly in relation to social care, children's services, SEND, homelessness and public safety) further details should be submitted on impacts and risks.
  - 7. Implications for the Devon and Torbay Combined County Authority should be set out.
- 1.7 On 21 August 2025 the Government also confirmed that:
  - The building blocks for any proposal that is submitted are whole district areas but in parallel as part of the submission, a request for a Ministerial modification can be made to amend boundaries in a particular way, to achieve an even better outcome, provided there is a strong justification for this.
  - Representations on the status of Plymouth City Council as a "continuing authority" can be included in the submission alongside any proposal, or in response to any subsequent consultation.
  - They are not actively seeking amendments to the English Devolution and Community Empowerment Bill currently before Parliament.
- 1.8 On 12 November 2025, the Scrutiny Management Board considered a draft of the City Council's proposal for local government reorganisation in Devon. The comments of the Scrutiny Management Board and the proposed response have been incorporated into this report.

#### 2.0 LOCAL GOVERNMENT REORGANISATION

2.1 The White Paper published in December 2024 announced that the Government will facilitate a programme of reorganisation for two-tier local government areas which will be abolished and replaced with an England-wide network of unitary councils sitting under new Strategic Authorities. The

Government anticipates that delivery will be phased, taking account of where local government can unlock devolution and where areas want to proceed at pace.

- 2.2 At the strategic authority level, the Government have highlighted 7 principles related to scale, there being "no devolution islands", effective delivery of key functions, the need for sensible economic geographies, contiguous boundaries with new constituent unitary authorities, promotion of alignment with other public body boundaries, and local identity. In relation to local government reorganisation the Government's expectations are:
  - All two-tier areas and smaller or failing unitary councils are to develop proposals for reorganisation.
  - All councils in an area should collaborate on developing unitary proposals in the best interests of a whole area, rather than producing competing proposals.
  - New councils should be the right size to achieve efficiencies, improve capacity, and withstand financial shocks. For most areas, the Government believes this will mean creating councils with a population of 500,000 or more. There may be exceptions to ensure new structures make sense for an area, agreed on a case-by-case basis.
  - They will prioritise the delivery of high quality and sustainable public services to citizens and communities above all other issues.
  - These reforms will be sequenced alongside devolution ambitions for each area.
  - New councils will be expected to take a proactive and innovative approach to neighbourhood involvement and community governance so that citizens are empowered.
  - Councils should work with Government to bring about changes as swiftly as possible.
  - They will consider which governance models available for local authorities' best support future decision-making.
- 2.3 New unitary councils are to be delivered in April 2027 and 2028, with shadow elections taking place earlier. The White Paper sets out that local government re-organisation should not delay devolution, and devolution plans should be complementary.

- 2.4 The White Paper therefore creates an opportunity to look at the geographical footprint of existing council areas, to ensure that local councils fit effectively within the new strategic tier of local government. It, as well as the subsequent letter from Government on 05 February 2025, sets out 6 criteria by which final proposals will be assessed and considered by the Secretary of State:
  - I. A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government.
  - 2. Unitary local government must be the right size to achieve efficiencies, improve capacity, and withstand financial shocks.
  - 3. Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens.
  - 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.
  - 5. New unitary structures must support devolution arrangements.
  - 6. New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.
- 2.5 In developing its own approach to local government reorganisation, the City Council and Cabinet in March 2025 supported, endorsed, and agreed to the following principles:
  - Any boundary change will be appropriate for a new Plymouth unitary authority to be financially viable and of a population size that can deliver sustainable high-quality services to residents.
  - 2. Any boundary change will retain the character and identity of the existing neighbourhoods in Plymouth and the parishes of any extended area.
  - 3. Any boundary change will respect existing unitary county boundaries.
  - 4. Any boundary change will minimise organisational impacts on the Dartmoor National Park Authority.
  - 5. Any boundary change will be based on existing parish boundaries.
  - 6. Any boundary change will have regard to the requirements for future sustainable growth and reflect the opportunities that arise from Plymouth's unique strategic role in the south west.

These principles were subsequently updated following the recommendation of the Scrutiny Management Board on 12 November 2025.

2.6 Whilst in practice there are a myriad of potential options for the structure of local government in Devon, on 17 March 2025 and 19 March 2025, the City Council and Cabinet considered 4 main options:

- Option I: An extended city boundary based on a Plymouth Growth Area.
- Option 2: An extended city boundary based on the Local Care Partnership Western NHS Locality.
- Option 3: An extended city boundary based on the Plymouth Housing Market Area.
- Option 4: Do nothing.
- 2.7 Both the City Council and Cabinet, in March 2025, supported and agreed to Option I-a boundary extension based on what was then termed the "Plymouth Growth Area" (now called "expanded Plymouth"). This part of the proposal for local government reorganisation for Devon, following the "Big Community Conversation," has not been changed.
- 2.8 Plymouth City Council's proposal for the whole of the Devon area is summarised in Section 4 and set out in full in Appendix A.

#### 3.0 THE "BIG COMMUNITY CONVERSATION"

- 3.1 Between 29 May 2025 and 04 August 2025, the Council undertook the "Big Community Consultation" on its proposals for local government reorganisation. Further events and meetings were held with local businesses and public sector partners between 28 August 2025 and 08 October 2025. This consultation was designed to meet the 4 "Gunning Principles" and respond to the requirements of Government set out in the letter to the Devon authorities dated 15 May 2025, particularly in relation to Criterion 6a and 6b. The Council adopted a multi-channel strategy to reach a wide and diverse audience. This included a dedicated project website, tailored surveys, facilitated conversation events, stakeholder briefings, and a targeted media campaign. The engagement was structured to allow meaningful input before the final business case is submitted to Government.
- 3.2 To ensure that as many people were reached as possible, the "Big Community Consultation":
  - Held 19 facilitated conversation events across Plymouth and South Hams, attended by 489 people.
  - Circulated two tailored surveys which received 824 responses.
  - The project website attracted over 11,000 unique visitors and 816 subscribers.
  - Launched a social media campaign which generated over 2.1 million impressions and reached more than 100.000 individuals.
  - Distributed posters, flyers and newsletters to community venues, schools, GP surgeries and libraries across both Plymouth and South Hams.
  - Held 17 stakeholder meetings and 1:1 briefings with MPs, universities, emergency services, housing, and business groups.
- 3.3 The engagement process was designed to ensure that Plymouth City Council's proposals for LGR were shaped by the views of residents, stakeholders, and community groups across Plymouth

and the 13 South Hams parishes. The approach was inclusive, transparent, and responsive, with a strong emphasis on listening and co-design.

- 3.4 The full Plymouth Local Government Reorganisation "Big Community Conversation" Report is attached as an appendix to the proposal document.
- 3.5 The main issues raised during the engagement, and how the City Council has responded to them, are shown below:

<u>Governance and representation:</u> The proposal must outline how rural communities will be represented within the expanded authority. This includes exploring models such as preserving parish councils, dedicated rural wards, or advisory panels.

<u>Cabinet response</u>: We will progressively move from informing and consulting towards collaborating and empowering, building community confidence and capacity along the way. Our approach recognises that empowerment looks different in different places within unitary model of government across England, and it will be consistent with Clause 58 of the English Devolution and Empowerment Bill currently before Parliament. In adopting a phased approach, and whilst awaiting the detailed regulation (see Clause 58 (3)) of the bill the City Council will work flexibly to support locally appropriate neighbourhood governance solutions whilst maintaining consistent standards and values across the enlarged area.

**Service equity:** The proposal should demonstrate how services will be maintained or improved across all areas, with particular attention to rural needs, transport connectivity, healthcare access, and waste management.

<u>Cabinet response:</u> Plymouth City Council's local government reorganisation proposal extends proven excellence across Devon while ensuring no community experiences reduced service quality. The four-authority model specifically addresses rural needs through dedicated structures that eliminate current fragmentation.

The dedicated Devon Coast and Countryside authority is purpose-designed for dispersed populations through Neighbourhood Area Teams integrating housing, social care, NHS, and voluntary services. Plymouth's integrated health and social care model with Livewell Southwest will serve all 300,000 residents of the expanded area, while Torbay's nationally recognised Integrated Care Organisation excellence benefits South Devon's wider geography. Plymouth's Homelessness Recovery Programme, delivering 78 new temporary accommodation units with 95 more in pipeline, extends across the enlarged area. An "expanded Exeter" authority addresses substantial unmet adult social care needs through integrated housing and planning powers. There is an unequivocal commitment to ensure safeguarding duties and service continuity for vulnerable children and adults throughout the transition period, with robust oversight mechanisms strengthened across all new unitary structures.

**Financial transparency:** Concerns regarding council tax harmonisation, funding allocations, and debt inheritance must be addressed clearly and credibly. Residents want to understand how resources will be managed and whether the reorganisation will deliver value for money.

<u>Cabinet response:</u> Decisions to set financial plans, budgets and council tax for the "expanded Plymouth" area will be taken in formal committee meetings, open to scrutiny by the public and elected councillors. All financial matters will be subject to external audit and assurance, with value for money assessed annually as is the case currently. It is anticipated that decisions on inherited assets, liabilities, and debt will follow national guidance and, again, will be reported transparently and subject to public scrutiny and external audit where appropriate.

**Planning and development:** The proposal must include safeguards against overdevelopment and urban sprawl. It should promote strategic planning that respects local character, protects green spaces, and ensures infrastructure keeps pace with growth to meet the needs of the expanded authority.

<u>Cabinet response:</u> We will commit to the early commencement of a new local Plan for the expanded Plymouth area that will address the planning and development concerns raised. We also commit to an extensive programme of community and stakeholder engagement as part of preparing the new plan.

<u>Community engagement:</u> Ongoing engagement must be built into the governance model. Residents want to be part of the decision-making process, not just consulted at key milestones. Mechanisms for feedback, participation, and accountability should be embedded in the proposal.

<u>Cabinet response</u>: The City Council's proposal embeds ongoing engagement as a structural guarantee through innovative "Neighbourhood Networks" operating from vesting day. These collaborative forums will bring together ward councillors, parish representatives, community organisations, and service partners, providing continuous dialogue rather than episodic consultation. Enhanced Parish Partnership Agreements strengthen the first tier of local government through devolved responsibility and comprehensive support. The 'Test, Learn, Grow' co-design process ensures communities shape their own governance model through extensive listening sessions, pilot experiments, and rigorous evaluation. This iterative approach creates mechanisms for continuous feedback, participation, and accountability embedded throughout the authority's operations, ensuring democratic legitimacy and genuine community ownership.

**Youth inclusion:** The views of young people must be reflected in the final proposal: their priorities for housing, transport, education, and wellbeing are essential to shaping a future-ready city.

<u>Cabinet response:</u> In addition to committing to continued direct engagement with the Youth Council on Local Government Reorganisation and service design issues, our new Community Engagement Framework will ensure the voice of young people is heard. The City Council is also committed to holding bespoke sessions with young people on the new Local Plan for the "expanded Plymouth" area.

<u>Digital inclusion:</u> The Council must commit to maintaining non-digital service options and investing in digital literacy and infrastructure. Accessibility must be a core principle of service design.

<u>Cabinet response:</u> The Council has an approach to the service design that includes the principle of designing for digital first as well as providing alternative accessible services for those that are digitally excluded. Accessible services include both phone support and in person, primarily through our network of libraries. For example, we have registered the phone numbers of residents who are digitally excluded and their calls are prioritised over other customers when they need to call Plymouth City Council. This is coupled with a focus on improving digital inclusion in the city through supporting network providers to deliver infrastructure (IGbps broadband and 4 and 5G mobile services) and helping residents with the skills and providing access to equipment that will allow them to get online. Recent survey results show that only 3% of Plymouth residents never use the internet and a further 2% are insufficiently confident in their use of the internet. We are using these results including both age and geography splits of this data to help us target interventions to help overcome this level of digital exclusion.

# 4.0 PLYMOUTH CITY COUNCIL'S PROPOSAL FOR LOCAL GOVERNMENT REORGANISATION FOR DEVON

#### **Base Proposal**

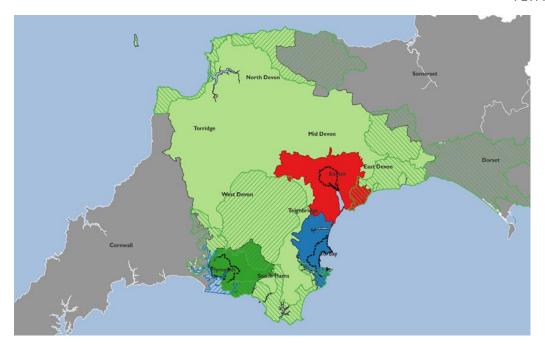
- 4.1 It is a requirement under the 2007 Act to base a proposal on whole district building blocks. The base case proposal sets out the City Council's response to the Secretary of State's invitation issued on 05 February 2025 (and taking account of the feedback on the Plymouth's Interim Plan set out in the letter of 15 May 2025).
- 4.2 Plymouth City Council's base case for local government reorganisation for Devon is to submit a combined proposal (under the provisions of Section 2(1)(d) of the 2007 Act) as follows:
  - Plymouth City Council as a continuing unitary authority with a population of around
     270,000 based on its existing unitary council boundary.
  - Exeter City Council as a unitary authority with a population of around 135,000 based on its existing administrative boundary.
  - Torbay Council as a continuing unitary authority with a population of around 139,000 based on its existing unitary council boundary.
  - Devon County Council as a unitary authority with a population of around 690,000 based on its existing county boundary excluding the district of Exeter.
- 4.3 The base case has been assessed against the six criteria set out in the White Paper and also in the Ministerial letter dated 05 February 2025. It is the City Council's assessment that this base case meets some but not all the six criteria. Were this to be approved by the Secretary of State, then Plymouth City Council would remain on its existing administrative boundary and the wider benefits of local government reorganisation, subsequent devolution, and the delivery of significant growth potential arising from the Defence Deal, the designation of Plymouth as the National Centre for Marine Autonomy and its shortlisting as one of the Government's planned new towns would be severely compromised.
- 4.4 This base proposal is prepared in accordance with Part 1 of the 2007 Act, but it is not the final proposal that the City Council wishes to see implemented: that is the proposal which would require a Ministerial modification to create four unitary councils across Devon.

#### **Options Appraisal**

- 4.5 Since the submission of the Interim Plan in March 2025, further analysis has been undertaken on the options for local government reorganisation in Devon. All of these options have been assessed against the six criteria in the White Paper.
- 4.6 The further options considered have been:
  - A four unitary option comprising unitary councils for Plymouth, Torbay and Exeter on extended boundaries and a unitary Devon council on a revised geographical footprint.
  - A "I-4-5" unitary option comprising three unitary councils with Plymouth on its existing boundary, the combination of the existing districts of West Devon, South Hams, Teignbridge, and Torbay ("District 4"), and the combination of the existing districts of East Devon, Exeter, Mid Devon, North Devon, and Torridge ("District 5").

#### **Ministerial Modification**

- 4.7 Under the provisions of Sections 7 and 11 of the 2007 Act the City Council can request a Ministerial modification to its base case proposal because this will deliver longer-term benefits in proactively working with the South West Peninsula Mayoral Strategic Authority to drive growth. The proposal, which reflects the City Council's vision for local government, which would require a Ministerial modification is for there to be 4 unitary councils covering the Devon area as follows:
  - <u>"expanded Plymouth" Unitary Council</u> comprising the unitary council of Plymouth City
    Council as a continuing authority with a population of 270,000 with a Ministerial modification to
    include 13 parishes all within the current district of South Hams District Council of Bickleigh,
    Shaugh Prior, Sparkwell, Brixton, Wembury, Cornwood, Harford, Ugborough, Ivybridge,
    Ermington, Yealmpton, Holberton and Newton and Noss resulting in a population of
    approximately 300,000.
  - <u>"expanded Exeter" Unitary Council</u> comprising a new unitary council based on the current Exeter City Council boundary with population of 135,000 with a Ministerial modification to extend this with 15 parishes from within Teignbridge District Council, 28 parishes from within East Devon District Council and six parishes from with within Mid-Devon District Council resulting in a population of approximately 260,000.
  - <u>"expanded Torbay" Unitary Council</u> comprising the unitary council of Torbay as a continuing authority on its existing boundaries with a population of 139,000 with a modification comprising of 23 parishes from within Teignbridge District Council and South Hams District Council resulting in a population of approximately 220,000.
  - A Devon "Coast and Countryside" Unitary Council comprising a new unitary council covering the rest of the former Devon County Council area resulting in a population of approximately 450,000.
- 4.8 The preferred proposal for four unitary councils to replace the existing county council and 8 district councils is shown on the map below:



#### 5.0 SCRUTINY MANAGEMENT BOARD (12 NOVEMBER 2025)

5.1 On 12 November 2025, the Scrutiny Management Board considered a draft of the City Council's proposal for local government reorganisation in Devon. The Scrutiny Management Board noted the draft submission and resolved that the Plymouth principles for local government reorganisation set out in the options appraisal be broadened to apply to the whole of Devon. In addition, there were two further actions requested arising from the scrutiny process. The decisions of the Scrutiny Management Board are set out below with the agreed Cabinet Member response:

Scrutiny Management Board Comments	Cabinet Member Response
That the Plymouth principles for local government reorganisation set out in the options appraisal be broadened to apply to the whole of Devon.	Accepted.  The principles have been updated to reflect the proposal for the whole of Devon and these have been applied within an updated Options Appraisal.
That Plymouth's Local Government Reorganisation Communications Plan is reported back to the Scrutiny Management Board prior to the Government's statutory consultation period, expected to be in 2026.	Accepted.  The Government, having considered the submitted local government reorganisation proposals for Devon, are expected to make an announcement on the timing of its statutory consultation in Spring 2026. A report on the draft Plymouth City Council Communications Plan that will raise awareness of the proposed four unitary model for Devon, will be brought to the 11 March 2026 Scrutiny Management Board meeting, subject to the Chair's agreement.

OFFICIAL Page 26 PLYMOUTH CITY COUNCIL

Scrutiny Management Board Comments	Cabinet Member Response
That the financial modelling included in the proposal be updated to include enhanced detail of assumptions made in relation to the savings, costs, and transition expenses in order to provide further transparency on the methodology used for the local government reorganisation proposal.	Accepted.  The financial section of the appendix to the proposal will be expanded to further clarify the assumptions that have been used to develop the financial modelling for the local government proposal.

#### 6.0 NEXT STEPS

- 6.1 Following the submission of Plymouth City Council's base proposal and request for a Ministerial modification in support for its preferred proposal, the Secretary of State needs to decide which of the proposals likely to be submitted by councils across Devon actually meet their six criteria. Once this assessment has been undertaken, the Government will undertake a statutory consultation on the option or options for local government reorganisation, he wishes to seek views from local people, business, and other stakeholders on. It is understood this will be in early 2026. Following a period of consultation, expected to be in the order of 7 weeks (as it was in relation to the recent consultation for local government reorganisation in Surrey), the Secretary of State will consider all the representations made and make a final decision on the unitary structure of local government for Devon.
- 6.2 If the Secretary of State decides to proceed, then a Structural Change Order will be prepared and laid before Parliament. This will remove the existing two-tier arrangement in Devon and disestablish the existing county council and district councils. This same Structural Change Order will also establish the new unitary councils.
- 6.3 There will be a transition period where all the necessary financial, legal, and organisational arrangements will need to be put in place, overseen by an Implementation Executive leading up to Vesting Day on 01 April 2028.

#### 7.0 CONCLUSIONS AND RECOMMENDATIONS

- 7.1 Plymouth is an ambitious city and welcomes the opportunities which arise from both the Government's devolution and local government reorganisation approach. Plymouth can and should play a unique role as an expanded city driving growth and delivering better public services. As a city and as a council, Plymouth has a track record of innovation, collaboration and focus on delivery through a wide variety of programme and projects it has delivered over the years. In order to fulfil its long-term potential and to enable the Government to meet its growth objectives, it now needs to operate on a more sub-regional footprint.
- 7.2 Plymouth City Council's plan for local government reorganisation for the Devon area is transformative, innovative, growth-orientated, and evidence-led. By moving from an outdated and inefficient two-tier system of local government to a modernised system based on for unitary councils this can deliver a sustainable and more resilient future for the people of Plymouth, Exeter, Torbay, and Devon.
- 7.3 Plymouth City Council's proposals for local government for Devon comply with the Government's criteria to be based on whole district boundaries but we are clear that this is not the

optimal future arrangement to achieve the Government's wider objectives set out in its White Paper in the Devon area. To achieve these wider objectives the City Council formally requests that the Secretary of State uses the powers conferred on him by virtue of Section 7 and 11 of the 2007 Act to modify the base proposal and it is that modified proposal that should be the basis for the Secretary of State's statutory consultation in 2026.

#### 7.4 It is therefore recommended that Cabinet:

- I. Agrees the "Plymouth City Council's Proposal for Local Government Reorganisation in Devon" document as set out in Appendix A and approves its submission to the Secretary of State for Housing, Communities and Local Government.
- 2. Delegates authority to the Chief Executive, in consultation with the Leader, to make any final changes to the Plymouth City Council's Local Government Reorganisation in Devon" before the deadline for submission.



# Plymouth City Council's Local Government Reorganisation Final Proposal





# A stronger Devon: Four Councils, One Connected Devon



"The two-tier system has failed Devonians. This is a once-in-a-generation opportunity to reshape how local government works - not just for Plymouth, but for every corner of Devon. Our proposal puts people first, with a model that reflects how communities live, connect, and thrive across the region.

"This isn't just about redrawing boundaries, it's about building a smarter, fairer future. It brings together the ambition of our cities, the strength of our towns, and the character of our rural and coastal communities.

"With four focused councils working together, we can deliver better public services, unlock investment, and give every part of Devon a stronger voice. We're asking the government to back a vision that works for everyone - from Barnstaple to Brixham, Exeter to Ivybridge.

"For Plymouth, this proposal secures our future as a thriving, resilient city - not in isolation, but as a driving force within a vibrant, connected region. It gives us the scale to lead, the flexibility to respond, and the partnerships to grow, while staying rooted in the communities that make Plymouth unique. For us it's about; realising national significant growth opportunities such as the defence dividend, that decisions are made closer to the communities they directly affect - not miles away - and it's also about value for money in how services are delivered through innovation and cultural change."



# Introduction and vision



#### Why change is needed

In early 2025, the Government invited councils across Devon to bring forward proposals for Local Government Reorganisation (LGR). This invitation was part of a national effort to simplify local government structures in areas that currently operate under a two-tier system - where responsibilities are split between district and county councils.

The Government's expectation is clear: proposals must cover the whole of the two-tier area, not just individual council boundaries.

Devon's current structure - with 11 councils including a county council, eight districts, and two unitary councils - is complex and outdated. It creates confusion for residents, duplication in services, and barriers to growth. People often don't know which council to contact, and services like transport, housing, and social care are split across administrative boundaries that don't reflect real life.

In response to the Government's invitation, Plymouth City Council has developed a proposal for a new model of local government across Devon. Our vision is to replace the current system with four new unitary councils that are simpler, stronger, and better aligned with Devon's geography, economy and communities.

#### **Our vision**

- We want to create a future where:
- Every resident has access to high-quality services from a single council
- Communities are empowered to shape their own neighbourhoods
- Growth is sustainable, inclusive, and strategically planned
- Local government is financially resilient and future-ready
- This is not just about changing boundaries it's about building a better Devon for everyone.

## What you have told us?



From our engagement with over 1,300 people in Plymouth and the 13 parishes in South Hams, we can see that people want:

- Culture and identity to be protected Decisions that are made locally and services that reflect local needs
- Services that are joined-up, fair and fit for the future
   Fairness, transparency and value for money
- Planning that protects what matters
   To be part of the process

# Our proposal



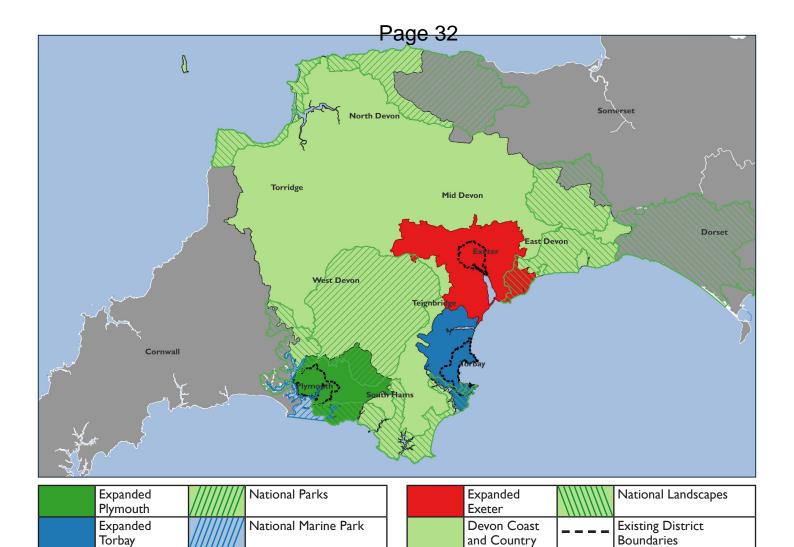
#### What we're proposing

Similarly to Exeter and Torbay councils, Plymouth City Council is asking the Government to in asking the Government to create four unitary councils for Devon, aiming to simplify local government and deliver better services for residents. Plymouth City Council's proposal includes:

- An expanded Plymouth: Plymouth plus 13 parishes from South Hams, expanding to serve communities across the city and surrounding areas that already rely on Plymouth for employment, education and healthcare. A council with the scale to compete nationally and drive growth.
- An expanded Exeter: Exeter plus surrounding parishes from Teignbridge, East Devon, and Mid Devon, unlocking the potential of one of Britain's fastest-growing cities, giving it the coherence and capacity to plan strategically for housing, transport and economic development across its natural economic area
- An expanded Torbay: Torbay plus nearby parishes, as a continuing council, with proven success in delivering integrated services, from acclaimed children's services to innovative health partnerships.
- **Devon coast and countryside:** A new council specifically designed for rural and coastal communities, with services tailored to the challenges of dispersed populations, market towns and isolated areas.

This structure recognises that Devon is not one homogenous place. Urban centres drive economic growth and innovation. Rural and coastal areas require specialist understanding and tailored services. This model delivers for both.

See our full draft proposal here: www.plymouth.gov.uk/lgr



#### Why are we proposing an expanded footprint for Torbay?

The only difference between our LGR proposal and Torbay Council's is the boundary. Torbay is proposing to retain its existing boundary, while we are advocating for an expanded footprint.

We believe that a broader boundary would create a strategically coherent unitary authority that better reflects natural economic patterns and travel-to-work areas. By integrating Torbay's tourism and hi-tech sectors with the retail, industrial, and heritage strengths of the surrounding areas, the expanded footprint would support a more diversified and resilient year-round economy.

# Will this affect local identity?



No. Our proposal celebrates Devon's diversity – from the moors to the coast, from market towns to cities. Each new council will:

- Reflect local strengths and priorities
- Preserve existing boundaries and identities
- Work closely with communities to shape services

## What are the benefits of our proposal?



There are many benefits in our proposal, including:

- Local services, locally delivered
- Financial resilience
- Responsive and agile governance
- Stronger, more stable workforce
- Respect for local identity
- Managed transition with minimal disruption
- Smarter use of resources
- Protected local democracy
- Safeguarded vital services
- Better partnerships with NHS, police, and others
- Empowered communities

See our full draft proposal here: www.plymouth.gov.uk/lgr

#### Page 33

# Why is our proposal stronger than the alternative models?



There are two alternative models being proposed by other councils in Devon.

- **Devon County Council's three unitary council model** keeping Plymouth and Torbay as they are and merging the rest of the county into one new, large Devon-wide council.
- The district council's 4-5-1 model consisting of three unitary councils: where Plymouth remains unchanged; however, Torbay merges with South Hams, Teignbridge, and West Devon; and Exeter joins East, Mid, North Devon, and Torridge.

While both aim to simplify governance, these proposals risk creating councils that are too large, too remote, and too disconnected from the communities they serve.

Our proposal offers a smarter, more balanced solution: four focused unitary councils that reflect Devon's real-life geography, economic links, and community identities. It builds on the proven success of Plymouth and Torbay as unitary authorities and proposes expanding and strengthening these models - including Exeter - to create councils that are fit for the future.

Unlike the single unitary model, our approach avoids over-centralisation and ensures local decision-making remains close to the people it affects. And unlike the 4-5-1 models, it also includes the creation of an expanded unitary Exeter - creating four councils that are fit for the future.

#### Our model:

- Keeps decision-making local and responsive, with councils that understand their communities
- Protects rural voices and urban capacity, giving each area the focus it deserves
- Delivers better services and stronger partnerships, with joined-up teams and clearer accountability
- Offers real value for money, reducing duplication and freeing up resources for frontline services
- Strengthens parish governance, with dedicated support for local priorities.

It's a smarter, fairer way to run local government - one that works for every part of Devon, not just the biggest centres.

# What it means for local people?



All services - from waste collection to adult social care - will be delivered by one council in your area, with joined-up teams, clear accountability, and local leadership.

#### This means:

- No more confusion between county and district roles
- No more duplication of services and inefficiency
- Faster decisions, smarter delivery, and better outcomes
- More funding directed to frontline services, not bureaucracy

#### For residents in wider Devon

#### It means:

- One council contact in each area no more confusion between district and county
- One council that can focus on the delivery of services to rural and coastal communities
- Three councils that can focus on the delivery of services to urban communities and their hinterland
- Continuation of social care through integrated services like Livewell Southwest

See our full draft proposal here: www.plymouth.gov.uk/lgr

- Better education planning and SEND support, tailored to local needs
- Infrastructure that reflects real life commuting patterns, housing needs, and service access
- Parish councils protected and empowered, with stronger local representation
- Fairer investment across urban, rural, and coastal communities
- Joined-up services that are easier to access, quicker to respond, and better value for money.

#### For Plymouth residents

It means:

- More resources to invest in services, infrastructure, and innovation
- A stronger voice in regional decisions through a strategic mayoral authority
- Better coordination of transport, housing, and employment across the Greater Plymouth area
- Support for key sectors like defence, marine, and green innovation
- Access to wider services through joined-up delivery with neighbouring communities
- A city that leads not in isolation, but as part of a connected, thriving region.

To see more detail of what the proposal would mean, go to: www.plymouth.gov.uk/lgr

# Will local communities still have a voice?



Absolutely. Our proposal strengthens local democracy by:

- Protecting town and parish councils
- Creating new Neighbourhood governance arrangement which reflect local priorities
- Ensuring rural and coastal areas are not left behind.

## The financial case



Independent financial modelling shows this plan is both sensible and bold. It will cost around £70 million to deliver across Devon, with about half going to workforce changes and redundancies. But the return is quick and significant.

By year three, the initial costs are repaid, and over the following decade, the new unitary councils could save more than £400 million. These savings come from streamlining services, cutting duplication, reducing senior management costs, and ending the inefficiencies of running eleven separate councils.

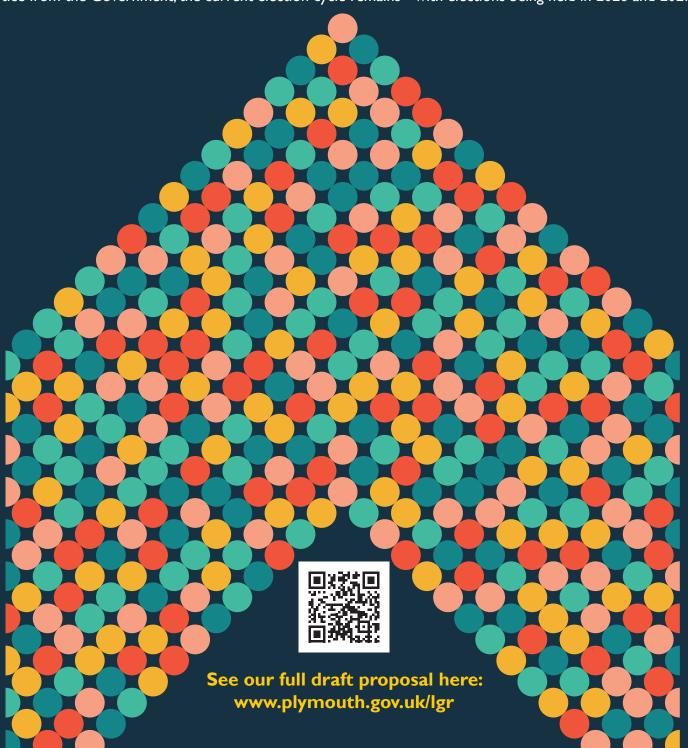
Critically, the proposal creates four financially sustainable councils with balanced tax bases. Each council will have the resources it needs to deliver quality services while building resilience for the future. No area is disadvantaged. No community is left behind.

For extended Plymouth specifically, the investment of £4.9 million delivers an annual return of over £6 million in improved viability, demonstrating the strong financial case for expansion. Similar analysis shows positive returns for each of the proposed councils.

# Timeline and next steps

Milestone	Date
Proposal submitted	November 2025
Government consultation	Early 2026
Elections	Spring 2026
Decision announced	Summer 2026
Elections	May 2027
New councils go live	April 2028

The Local Government Boundary Commission for England (LGBCE) has paused its electoral review of Plymouth pending the outcome of the Local Government Reorganisation process. Consequently, until further notice from the Government, the current election cycle remains - with elections being held in 2026 and 2027.



Introduction	6
The Current Situation in Plymouth	9
Why Plymouth Needs to Expand	13
Why Devon Needs Fundamental Public Service Reform	20
The Base Proposal for Local Government in Devon	26
The Modified Proposal for Local Government in Devon	30
How the Four-Unitary Model Delivers	
Why Boundary Modifications in Devon Are Essential	
Creating the Right Solution for All Devon	
Comparing the Options	
Option One: Four Unitaries on District Boundaries (Base Case)	
Option One: Plymouth	
Option One: Torbay	
Option One: Exeter	
Option One: Devon Coast and Countryside	
Option One: Assessment Against Criteria	54
Option Two: Four Unitaries (Modified Case)	
Option Two: Expanded Plymouth	
Option Two: Expanded Torbay	60
Option Two: Expanded Exeter	63
Option Two: Devon Coast and Countryside	66
Option Two: Assessment Against Criteria	68
Option Three: Three Unitaries (New Devon)	70
Option Three: Plymouth	72
Option Three: Torbay	73
Option Three: Devon County Council Area	74
Option Three: Assessment Against Criteria	76
Option Four: Three Unitaries (District Grouping)	78
Option Four: Plymouth	79
Option Four: Four District Unitary	80
Option Four: Five District Unitary	82
Option Four: Assessment Against Criteria	84
Rejected Options	86
Recommended Preferred Option	
Democracy and Community Empowerment	87
Better Services Across Devon	97
Devon's Financial Resilience	112

Building the Foundations for the South West Peninsula Devolution	129
Stakeholder Engagement and Support	133
Implementation Plan	138
Managing Transition Risks	143
Our Asks of Government	145
Conclusion	146

#### **Foreword**

Plymouth City Council strongly supports the Government's approach to devolving powers from Westminster and streamlining local government to a model based on unitary councils. Whilst devolution will bring greater powers and funding to our region, local government reorganisation will bring clarity and simplicity for local people and local businesses.

For far too long we have been held back because our existing city boundary cuts through communities and creates inefficiencies and delays in how we can work with local people to solve their problems and issues. This challenge is not unique to Plymouth. Exeter faces similar boundary constraints that prevent effective strategic planning, whilst Devon's rural and coastal communities are poorly served by the current two-tier fragmentation. It is why we are proposing to replace the duplication and waste of the existing two-tier system of local government in Devon with four unitary councils. By creating authorities that reflect how people live, work and access services, we can develop resilient local councils that deliver improved outcomes while maintaining the distinct identities that make this part of the world so special.

We have worked closely with Exeter and Torbay to develop a bold and imaginative proposal for four unitary councils to replace the county council and districts in Devon. Our proposal will provide four unitary councils that will have clearer lines of accountability, a stronger focus on the urban and rural communities they serve, stronger voices for local people and financial sustainability.

Plymouth is the powerhouse and growth hub of the South West and is relentlessly ambitious for its people and for its businesses. We are in a truly unique position to drive growth because of our nationally significant defence assets, our status as the national centre for marine autonomy, and our track record of delivering large scale award-winning regeneration and housing projects. Similarly, both Exeter and Torbay have ambitious plans for their areas and strong track records in delivering housing and regeneration initiatives. Together, Plymouth, Exeter and Torbay can be greater than the sum of their parts when it comes to using the new powers and funding arising from devolution. But this requires the modifications to all three areas set out in this proposal if the growth aspirations of the Government are to be realised.

Following the invitation from Government, Plymouth, Exeter and Torbay have taken a proactive approach and spent a lot of time talking to local residents, businesses, and other important stakeholders. We have given significant weight in developing our proposal for an expanded Plymouth to the character and identity of the communities which surround the city, so that they may share in the prosperity that is coming to city. Many residents in these communities already work in the city, some will have friends and family here, many if not most, will be frequent visitors to our theatres, our events, the hospital, and city centre shops. Again, this will be the same for the communities that are close to Exeter and Torbay.

Our proposal offers the best of both worlds – we want to create vibrant urban areas set within beautiful rural environments with thriving towns and communities with the highest quality of services across the whole area. Our proposal for Devon is therefore based strongly on the principle of subsidiarity, with decisions being made close to the communities affected and which protects the culture and identity of all the communities.

Plymouth is uniquely positioned to drive growth and deliver better public services across an expanded area. To realise its substantial development pipeline and help the Government meet its

national missions, Plymouth needs to operate at a larger scale. Expanding the boundary of Plymouth will require a one-off transition investment of approximately £4.9 million. However, this will strengthen Plymouth's financial resilience considerably, generating over £6 million in annual benefits. This represents excellent value for money and will underpin the council's financial sustainability for years to come, recognising that there are many future decisions that councillors need to make to achieve all the longer-term benefits we have identified in our proposal.

Plymouth's proposal is for four unitary councils because we believe this is the right answer for Devon.

A single, remote "mega-council" would fail to recognise the distinct needs of urban Plymouth, urban Exeter, coastal Torbay, and rural Devon.

- Two unitaries would leave some areas with fragmented governance.
- Three unitaries would force incompatible areas together.
- Four unitaries, including an expanded Plymouth, enable each area to have governance that matches its unique character and needs.

This is one of the most crucial periods in Plymouth's history. Together, we can build a brighter future for our great city, and for Exeter and Torbay.

We invite the Government to undertake a statutory consultation on our proposal.

Councillor Tudor Evans OBE Leader, Plymouth City Council

### Introduction

- 1.1. This submission presents Plymouth City Council's proposal for local government reorganisation across Devon, creating four unitary councils that will deliver transformational public service reform through the removal of administrative duplication, improved service integration, and more efficient use of resources.
- 1.2. The four unitary model comprises an expanded Plymouth City Council, an expanded Torbay Council and two new unitary councils; an expanded Exeter City and the 'Devon Coast and Countryside' authority. Together, these authorities will establish a single tier of local government that reflects the natural economic geography and functional relationships of this important region.
- 1.3. Our base proposal partially meets the requirements of the Local Government and Public Involvement in Health Act 2007 and meets some of the Government's six criteria set out in its legal invitation. However, the Ministry of Housing, Communities and Local Government (MHCLG) has confirmed that councils may wish to consider a proposal with modified boundaries including if existing boundaries would not meet the criteria or changes to boundaries would better meet the criteria.
- 1.4. Our modified proposal fully meets the Government's criteria because it aligns even better with how people actually live their lives, reflects travel to work and housing market areas, and enables services to be provided in ways that more proactively support growth, regeneration, access to health and social care. Critically, the modified proposal delivers genuine public service reform by creating coherent geographies for service delivery that avoid fragmentation, reduce administrative duplication, and enable place-based models of care that integrate health and social care services around the needs of communities rather than administrative convenience. It is on this basis that we invite the Secretary of State to use the powers in Section 11 of the 2007 Act to modify our base proposal to achieve even better outcomes for the whole of Devon.
- 1.5. Public service reform sits at the heart of our four unitary proposal. The current two-tier system creates inefficiencies through divided responsibilities between county and district councils, leading to confusion for residents, duplication of back-office functions, and barriers to integrated service delivery. By establishing four unitary authorities, we will remove these barriers and create the conditions for transformational change in how services are delivered, particularly in crucial areas such as children's social care, Special Education Need and Disabilities (SEND) provision, adult social care, and preventative services. As a continuing authority, Plymouth will be uniquely positioned to seamlessly integrate services across the extended area from day one, bringing proven excellence in children's services, adult social care, and integrated health partnerships to a wider community.
- I.6. Plymouth's innovative strategic planning approach through the Plymouth and South West Devon Joint Local Plan already demonstrates the successful collaboration which is possible across Plymouth and the communities of the South Hams. The expanded council will deliver integrated and effective local governance to the people of Plymouth and the surrounding areas that already naturally function as part of the Plymouth housing and economic area.

- 1.7. The four unitary model reflects the distinct needs of different parts of Devon. Plymouth and Torbay face the highest levels of deprivation, with significant concentrations of areas in the most deprived national deciles, coupled with higher levels of child poverty and lower life expectancy. This requires tailored, intensive support models. Meanwhile, the new Devon authority will focus on the distinct challenges of dispersed rural communities, including rural poverty, low wages, and pressures around housing affordability and connectivity. This differentiated approach ensures that public services can be designed and delivered in ways that genuinely respond to local circumstances rather than applying uniform models that work nowhere well.
- 1.8. The four unitary model creates a robust local government structure that serves both current and future generations, with the agility to embrace innovation whilst adapting to changing priorities. By eliminating artificial administrative boundaries that currently divide naturally connected communities, this proposal creates clear accountability, improves service delivery, and unlocks significant opportunities for housing growth and economic development.
- 1.9. Plymouth City Council has an excellent track record of sustained improvements to critical statutory services including adult and children's social care services. This is down to a relentless focus on putting outcomes for residents first, using transformative and innovative approaches to make the city's services better. We work at pace, with high energy and a mindset of continual improvement.
- 1.10. The expanded Plymouth will be equipped to provide enhanced service delivery achieved through the integration of services currently divided between county and district councils, leading to more cohesive and efficient operations.
- 1.11. This is a historic moment for Plymouth. Our vision is a future where the expanded Plymouth unitary authority delivers quality, cost effective public services to residents whilst maintaining strong community connections through innovative neighbourhood governance arrangements.

#### **Current Challenges**

- 1.12. The existing two-tier structure of local government creates artificial barriers in areas that naturally function as part of Devon's principal urban settlements. The division of responsibilities between county and district councils fragments service delivery, particularly for vulnerable residents who require coordinated support across multiple services. Families with children who have special educational needs, older people requiring both health and social care, and young people transitioning from children to adult services all face unnecessary complexity navigating between different tiers of local government. These administrative boundaries frustrate residents and delay solutions to cross-boundary issues such as housing delivery, transport planning, and economic development.
- 1.13. Businesses struggle to identify the right council to engage with on economic development matters across the economic area, whilst residents face confusion about service responsibilities between different tiers of government. The artificial division of naturally connected communities like Sherford, Cranbrook and Exminster and other urban fringe areas undermines effective strategic planning and service delivery. Meanwhile, the duplication of corporate services across 11 separate councils represents a significant waste of public resources that could be redirected to front-line provision.

#### **Strategic Opportunity**

- 1.14. Plymouth has established itself as a successful unitary authority with a strong track record of innovation, and continued improvements in critical services such as social care. The city's strategic location, world-class assets including the waterfront and naval heritage, and growing knowledge economy position it as a natural focal point for the wider economic region.
- 1.15. Expanding Plymouth represents a coherent economic geography with shared transport networks, housing markets, and employment patterns. Extending the unitary governance to encompass this natural area will unlock significant benefits for residents, businesses, and communities across both urban and rural settings.
- 1.16. Expanding Exeter and Torbay will similarly allow better sub-regional coordination of transport infrastructure and the delivery of accelerated levels of housing and employment. Together with Plymouth, these three growth-orientated authorities will provide a strong urban voice within the South West Peninsula Mayoral Strategic Authority whilst the new Devon authority can focus resources on the distinct challenges of delivering quality services across dispersed rural communities. This differentiated approach, unified by collaborative working at the strategic level, represents genuine public service reform that places the needs of residents and communities at its centre providing a strong basis for the early preparation of the Spatial Development Strategy to achieve the Government's national growth ambitions.

#### **Our Local Government Reorganisation Principles**

- 1.17. Whilst we recognise that Government has set out its own criteria for local government reorganisation, and we support those; we developed our own set of principles for local government reorganisation in our Interim Plan submitted in March 2025 which reflected the unique position of Plymouth and its planned modest boundary extension. In the time we have had to discuss these proposals with key stakeholders since March 2025, and to reflect observations by Plymouth City Council's Scrutiny Management Board, we have considered local government options against updated principles which reflect the Government's requirement to bring forward a proposal that relates to the whole area of Devon:
  - I. Any boundary changes for Devon will be appropriate for continuing and new unitary authorities to be financially viable and be of a population size that can deliver sustainable high-quality services to residents.
  - 2. Any boundary change will retain the character and identity of the existing neighbourhoods across the whole Devon area.
  - 3. Any boundary change will respect existing unitary county boundaries.
  - 4. Any boundary change will minimise organisational impacts on National Park Authorities and National Landscapes.
  - 5. Any boundary change will be based on existing parish boundaries.
  - 6. Any boundary change will have regard to the requirements for future sustainable growth reflecting the unique growth opportunities in each of the proposed unitary authorities.

## The Current Situation in Plymouth

- 2.1. Plymouth has been an incorporated council since 1439 and became a municipal borough in 1836. In 1914, it absorbed the towns of Devonport and Stonehouse and was granted city status in 1928. In 1951, there was a northward extension to the city boundary to accommodate the rehousing the population devastated by massive enemy bombing during the Second World War.
- 2.2. On I April 1967, the suburbs of Plymstock and Plympton were included within a revised boundary as part of planned growth to meet housing needs. It is 58 years since the boundary of the city has been changed to reflect the reality of growth on the ground.
- 2.3. Continuation of the city's outdated boundaries would mean continued reliance on cooperation and shared priorities with surrounding authorities. This would deliver inefficient government and sub-optimal strategic place-shaping leadership for Plymouth and the subregion. This is particularly concerning as district authorities will be absorbed into a model of larger unitary local government to be confirmed for the rest of Devon. In these circumstances, the understanding that existing neighbours have of the relationship between the city and sub-region, and the close working relationship this has fostered is likely to be undermined.
- 2.4. Plymouth is an ambitious city with a lot to offer. We have a resident population of around 270,000, making it the most significant urban area southwest of Bristol, with plans to grow to over 300,000 by 2034. The city has a radical and ambitious vision to be one of Europe's finest, most vibrant waterfront cities.
- 2.5. Plymouth is one of the 22 authorities that make up the Key Cities Group and has been identified as one of the country's key locations for meeting national housing needs through the provision of sustainable communities.
- 2.6. Plymouth has been identified as one of Homes England's priority places "because of its visionary local leadership and unique geographic position. This offers an exceptional opportunity to make the most of existing Government defence investments, which will help transform the city's built environment and improve life opportunities for both the city and the wider region, all while directly supporting national defence in support of the Government's agenda" (Letter dated 14 February 2025, Homes England Interim Chief Executive). The City and Homes England signed a Memorandum of Understanding in June 2025 to commit building 10,000 homes in the city centre.
- 2.7. The Council has developed a variety of long-term strategic investment frameworks with funders over the past decade and pioneered some nationally significant work with the Local Enterprise Partnerships, Arts Council England, the National Lottery, the National Defence Gs Team and MHCLG, the National Trust and many others. We have taken a lead role in developing strong partnerships such as with Peninsula Transport, the sub-national transport body who we host, and in relation to bus provision the Plymouth Enhanced Bus Partnership with local operators.
- 2.8. Plymouth's economy is worth £7.3 billion and supports approx. 117,000 jobs and 120,000 dwellings. Through proactive approaches to planning and regeneration the City has approved £2.7 billion of development in the last few years. Plymouth also has a nationally and regionally

- significant pipeline of growth, which has strong cross-party support, estimated at £9 billion. Additional investment of £700 million is being made into strategic and sustainable transport infrastructure to support planned growth, and the Bus Services Improvement Plan seeks to bring forward a further £311 million to meet the needs of a growing population.
- 2.9. Plymouth has continued to attract Foreign Direct Investment (FDI). Over the last five years, £332 million worth of FDI came to Plymouth, securing 1,460 new jobs. The city is home to one of only 12 Freeports in the country and the only one in the South West. The Plymouth and South Devon Freeport has received £25m of government funding, which will be matched with £31m of private investment and is forecasted to deliver over 3,500 jobs. the city launched the UK's first National Marine Park with a £11.6 million funding from the National Heritage Lottery Fund, aiming to actively engage 264,000 people, contribute £20.2m in Gross Value Added (GVA) and collaborate with 200 businesses
- 2.10. Plymouth's marine and defence economy is at the heart of its economic identity: 20,110 jobs which is 18% of Plymouth's total employment and providing 21% of Plymouth's GVA. Plymouth is a global centre of excellence for marine science and technology and has recently been recognised in the Industrial Strategy as the National Centre for Marine Autonomy. This is underpinned by the fact that Plymouth is home to three universities and one-in-four knowledge jobs are in its universities.
- 2.11. Plymouth is also home to the largest naval base in Western Europe, HMNB Devonport. The dockyard contributes 14% of Plymouth's economic output and sustains about £511m local supply chain spend per annum across 400 businesses. HMNB Devonport is a crucial support base for the Continuous-At-Sea-Deterrent (CASD) and Plymouth has been named as one of the first five Defence Growth Deals in the recent Defence Industrial Strategy. Plymouth City Council, the Ministry of Defence and Babcock International have launched Team Plymouth an ambitious partnership with a Ministerial Oversight Group, jointly chaired by MOD and MHCLG to maximise the opportunity for defence investment to support CASD whilst driving sustainable and inclusive growth, innovation and opportunities for Plymouth and the region. This will support:
  - £4.4 billion of investment in defence with a confirmed programme of work that extends to 2070.
  - 5,500 new recruits needed over the next ten years to sustain Babcock's current workforce and more than 2,000 construction jobs in addition. Current projections show that by 2035, Plymouth will have 25,000 more jobs than people in the workforce to fill them.
  - Unprecedented long term demands for skills and housing.
- 2.12. The city's plans are in line with the aims set out in the Government's "Plan for Change: Milestones for a Mission-Led Government" to:
  - Establish stronger foundations for national renewal.
  - Kickstart economic growth.
  - Building an NHS for the future.
  - Create safer streets.
  - Break down the barriers to opportunity.
  - Make Britain a clean energy superpower.

- 2.13. Achieving these ambitions will require strong local leadership with vision and a relentless commitment to delivery. Plymouth offers exactly that; however, success demands a city region approach which:
  - Unlocks Plymouth's potential for transformational growth.
  - Raises prosperity across the sub region.
  - Addresses housing need, with a focus on affordable housing.
  - Develops comprehensive infrastructure to support our communities.
  - Responds and develops functional relationships between the city and surrounding settlements.
  - Maintains the cherished world class environment in which the city is set.

#### Why Plymouth City Council would be a "Continuing Authority"

- 2.14. Plymouth is 28th most populous authority out of 255 unitary authorities based on mid-year 2024 population data. Continuing on its existing geographical unitary footprint, Plymouth City Council would meet the Government's 6 criteria set out in its legal invitation, being unitary in nature, able to continue to deliver efficiencies in operation, able to continue to innovate and deliver high quality public services, continue partnership working, support devolution and enable future neighbourhood working.
  - 2.15. As the proposal from the City Council is to remain on its existing unitary boundary this meets the "starting point" requirement of Government set out in a letter dated 21 August 2025 from the Co-Deputy Director for Local Government Reorganisation to the Chief Executive of Plymouth City Council that it would be, by definition, a "continuing authority".
- 2.16. Plymouth City Council's preferred approach is for the Secretary of State to modify its local government reorganisation proposal. Under this modification, Plymouth would remain on its existing unitary boundary and include 13 parishes currently within South Hams District Council's area. This expanded Plymouth area would be a "continuing authority" for the following reasons -
  - The extended authority area would represent a modest increase of around 10% in the population served by the authority and therefore be a moderate change.
  - As a Continuing Authority, the implementation costs would be around £5 million. As a
    new authority, this could rise to c. £7.5m because of the impact of potential redundancy
    costs, 'parallel running' costs for a shadow authority, and additional programme
    management costs.
  - As a minimal numbers of staff would need to be transferred from Devon County Council
    and South Hams District Council who currently provide services to local people in the
    extended area, there would be no need for wide-ranging TUPE arrangements to be put in
    place covering all staff currently within Plymouth City Council, again maximising continuity
    of service delivery and minimising disruption arising from the local government
    reorganisation process for local people and businesses.
  - Continuity of service provision in the areas of SEND, children's social care, adult social
    care, planning, waste, homelessness would be achieved by adding the relatively small
    number of additional service users in the extended area to the City Council's existing
    operational delivery arrangements.

- Existing contractual arrangements within the extended area would be novated to the City Council, thus minimising disruption, and cost.
- There would be no need for complex land transfer arrangements to be put in place which would be required if any new authority was created.
- This would allow a faster mobilisation in relation to the preparation of new-style Local Plans and a Sustainable Development Strategy for the wider devolution area of Devon envisaged under the Planning and Infrastructure Bill currently before Parliament, thereby allowing the Government's wider growth and accelerated housing missions to be achieved.

This would provide a firmer foundation to drive forward the Government's Defence Industrial Strategy objectives arising from the identification of Plymouth as the UK's national centre for marine autonomy, ensuring no disruption to the emerging Defence Growth Deal.

## Why Plymouth Needs to Expand

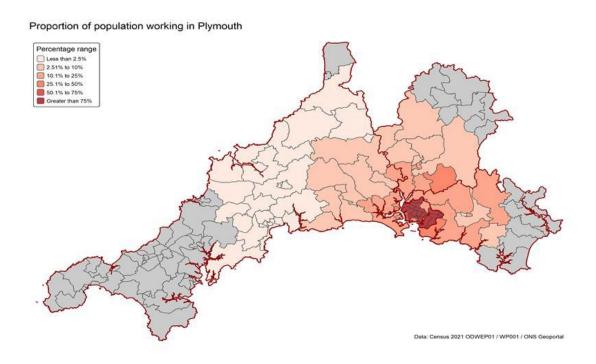
- 3.1. We are clear that we should only suggest boundary changes where we believe this will assist in delivering the vision for the city and sub-region more effectively. We believe that there is an exceptional case for a modest boundary extension based on just 13 existing parishes surrounding Plymouth. This would unlock further growth opportunities, respect local identity, and create a more coherent and efficient administrative structure. By basing the boundary change on Plymouth City Council being a continuing authority this will facilitate the delivery not only of the proposal for four unitary councils across Devon but also the foundations for the creation of a South West Peninsula Mayoral Strategic Authority.
- 3.2. Any changes to the structure of local government in Devon will inevitably impact upon Plymouth. When radical change takes place in the rest of the county, new structures in Devon are unlikely to make sense without reconsidering of Plymouth's boundaries. Not to do so would be a significantly regressive step and damaging to competitiveness of the city and its city-region, risk the delivery of the regional economic growth agenda for the South West and would not deliver the most effective strategic leadership, value for money or neighbourhood empowerment.
- 3.3. The need for considering a boundary change for Plymouth as part of the wider local government reorganisation is borne out by the critical relationships between the city and the surrounding city-region. For example -
  - Plymouth's economic performance can only sensibly be measured and planned for at a sub-regional level. Key sites for Plymouth's prosperity, such as Langage Business and Energy Parks and part of the Freeport extend beyond the city's current administrative area. A balanced strategy for economic growth is required throughout the sub-region to ensure that prosperity is shared, growth is sustainable and sensible spatial and infrastructure planning will help drive economic growth. To put Plymouth's economy in perspective, it is 50% of the size of Cornwall's economy and 32% the size of Devon's economy.
  - Plymouth's housing needs cannot be met entirely from within the city's current boundaries. This has been acknowledged for many years through the development of previous Structure Plans for Devon and Cornwall, and most recently in the Plymouth and South West Devon Joint Local Plan which establishes a "Plymouth Policy Area" for the wider sub-region around the city. The Sherford new town and planned Woolwell and Plympton urban extensions (located in South Hams District Council) have been required primarily to meet housing needs in the city, but even with this development there remains significant unmet need in the sub-region. Sherford, Woolwell and the urban extension east of Plympton are physically attached to the city and there is more potential still to be delivered. Under the Government's Standard Method, Plymouth has a housing target of 1,280 dwellings per annum (compared to 660 dwellings per annum in the current adopted plan) and South Hams has a target of 922 dwellings per annum.
  - Plymouth's cultural offer is of significant importance to the entire sub-region.
     365 creative and cultural enterprises are located in Plymouth and the city hosts an array of regionally and nationally significant venues. For example, the Theatre Royal Plymouth is

the largest and best attended regional producing theatre in the UK and the leading promoter of theatre in the South West, achieving annual audiences of over 300,000 annually. The Box is now also a nationally significant museum and cultural centre and has attracted over I million visitors. The immersive 360-degree dome at Market Hall is the only one of its kind in Europe.

- Plymouth is home to three universities, which cater for about 23,000 students, many from the region. For example, 73% of Plymouth Marjon University's undergraduate students originate from the South West region. With 2 Gold and I silver Teaching Excellence Framework ratings across all three universities, Plymouth's academic sector provides a high quality and nationally recognised higher education teaching. Arts University Plymouth is not only the UK's newest specialist arts university, but has also won the title of University of the Year for South West England. Plymouth Marjon University is ranked third in the UK for teaching quality and joins Arts University Plymouth with both institutions ranked exceptionally high within Student Satisfaction surveys. Finally, University of Plymouth consistently makes significant strides within marine studies research and has been ranked among the world's top 100 universities for sustainability. University of Plymouth is linked with Derriford Hospital, the largest specialist teaching hospital in the South West Peninsula and also offers exceptional clinical learning with world class research through its Peninsula Dental School.
- Areas outside the city's boundaries also look to Plymouth for a range of services such as education and health. Plymouth's GP surgeries have just over 300,000 registered patients, in comparison to Plymouth's current population of about 270,000. Approximately 1,000 children commute for secondary education both to and from Plymouth with a significant number of young people also travelling to further education opportunities. Aligning administrative boundaries with these actual service delivery patterns would enable more coherent commissioning and planning of public services, improve coordination between health, education and social care, and create clearer accountability for outcomes across the functional area that residents already rely upon for essential services.
- The sustainability of growth in Plymouth is dependent to a large degree on infrastructure outside of the current administrative area. This is in part a consequence of the tightness of the city's current boundaries, but also the strong pattern of commuting to the city from surrounding settlements.
- 3.4. Since 2016 the Council has secured over £450 million in external grants to support the delivery of net zero infrastructure and other decarbonisation projects. This has resulted in total investment of over £662 million. Plymouth City Council was identified as one of the six pilots for the district heating Advanced Zoning Pilot which has huge potential to be expanded to areas outside the city.
- 3.5. Plymouth plays a fundamental role in our country's defence, made even more significant considering the announcements by the Prime Minister on 25 February 2025 in relation to the strategic need to increase overall defence spending in the face of global threats and uncertainties. HMNB Devonport provides a crucial support base for both the surface fleet and submarines. It is the only place with the capacity and capability for the comprehensive maintenance for Continuous at Sea Nuclear Deterrent. The Ministry of Defence's investment of £4.4 billion in HMNB Devonport will kickstart a confirmed programme of

- work that extends to 2070 and which is of unique national importance, as demonstrated in the Government's Defence Industrial Strategy.
- 3.6. However, with structural challenges around city productivity, 21.7% of the working age population being economically inactive, and being in the top 20% of deprived wards, the city is dragging an anchor of legacy issues. Team Plymouth a partnership between the Ministry of Defence, Babcock International and Plymouth City Council will address these skills and capacity gaps and deliver economic growth with a focus on regeneration, business innovation and technology, building on the announcement of Plymouth as one of the first five Defence Growth Deals.
- 3.7. Figure 7.1 is evidence of the strong functional relationship between Plymouth and much of its hinterland in terms of employment and commuting.

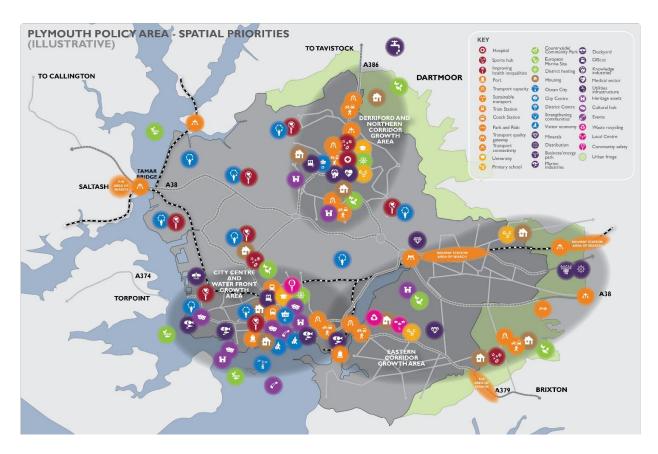
Figure 3.1.



- 3.8. Effective local democracy in England works best when council boundaries match how people actually live their lives. People need to access their homes, workplaces, and the community and family networks they depend on, all within one clear democratic area.
- 3.9. There is a strong case for changing Plymouth's boundaries because of how the city has grown and how services are delivered.
- 3.10. Significant existing and planned developments already sit directly on Plymouth's boundaries (see Figure 3.2). The "Plymouth Policy Area" is a planning concept in the Plymouth and South West Devon Joint Local Plan (2014 to 2034), adopted in March 2019. This plan allows for the city's growth, but the new development sits within South Hams District Council's administrative area.
- 3.11. Running services for these areas from a different authority is inefficient. It means governance and accountability are tied to a more distant centre. Any solution for local government in

Devon that does not fix these problems will deliver poor value for money and weaker neighbourhood empowerment.

Figure 3.2

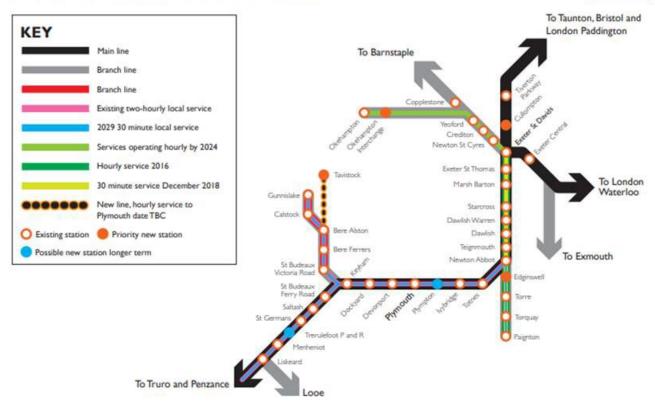


- 3.12. Plymouth has a long track record of planning on a sub-regional basis for transport. This is best exemplified by the "Plymouth Metro" concept shown in Figure 3.3. The "Plymouth Metro" provides a strategic opportunity to grow Plymouth's travel to work area using rail stations and rail services and has the support of Network Rail and the Train Operating Company Great Western Railway.
- 3.13. "Plymouth Metro" will ensure that investment in rail supports delivery of growth for Plymouth, maximising benefits from the investment in Devonport Dockyard and creating sustainable transport options for the location of new housing developments. It will kick start growth, tackle deprivation, reduce costly congestion and reduce carbon emissions from transport. It will deliver a package of measures that will create high quality, frequent rail services in and around Plymouth, south east Cornwall, and South West Devon. It will transform productivity of the city region, creating an attractive, wider travel to work area for a growing city region. Work is already underway with Network Rail leading a strategic study investigating what infrastructure improvements are needed to accommodate greater train frequencies, alongside timetable and economic analysis and an assessment of current station facilities.

Figure 3.3

## PLYMOUTH METRO -LOCAL RAIL NETWORK





- 3.14. Finally, expanding Plymouth's boundaries will support the resilience, viability and sustainability of the City Council and deliver significant efficiency savings through economies of scale.
- 3.15. At the core of our strategic vision lies an extraordinary opportunity underpinned by an unprecedented national investment in defence. This represents a pivotal "Why now moment?" for Plymouth and its surrounding area, and a "once in a generation" opportunity to reshape our local economic landscape.
- 3.16. Plymouth, based on an expanded city boundary, can offer:

#### Ambition

 We have a long-standing commitment to deliver growth through our adopted local plans and building upon our national specialisms in defence, advanced manufacturing and have the UK's highest proportion of marine jobs.

#### A Track Record of Delivery

 The natural environment is one of Plymouth's greatest assets. For many years we have developed innovative approaches to environmental planning and have a track record of working with communities and partners to deliver natural infrastructure improvements.

- O Plymouth's land area is 43% green spaces, we have three national landscapes, the UK's first National Marine Park, nine Sites of Special Scientific Interest, 28 County Wildlife sites, 13 Local Nature Reserves and 109 natural spaces managed by community groups we support. Through our work on the Plymouth and South West Devon Joint Local Plan we have already developed planning policies that support the protection of cherished and important landscapes.
- O Having retained our planning, place-making and regeneration capacity, we have committed £300 million capital over the last ten years to regeneration, levering in over £600 million of investment. We created a £200 million Property Regeneration Fund, delivered 11 direct developments and pioneered creative approaches to models of delivery. This includes innovative programmes such as our Market Recovery Scheme, Get Plymouth Building programme and our award-winning Plan for Homes initiative, as well as forward funding, land assembly and estate renewal.
- Recently completed investments in Plymouth include the Derriford District Centre, Crownhill Court, Plymouth International Medical and Technology Park, Oceansgate, ABP port investment and Tinside Lido refurbishment.
- We have an ambitious pipeline of ongoing and future investments, including HMNB Devonport, University Hospital Derriford New Hospital programme, Brickfields sport facilities, Mount Batten, ABP shore power, Community Diagnostic Centre and a transformative £50m public realm regeneration project across the city centre.
- We not only excel in direct delivery but also have a successful track record of delivering government funds as Accountable Body. We were one of the first Freeports in the country to draw down all our allocation of seed funding and we received our full final year allocation of UK Shared Prosperity Fund (UKSPF) due to our successful delivery of previous years.

#### • A Pipeline of Growth

- We see the provision of natural infrastructure as an integral part of our wider growth ambitions for the city and surrounding area. The success of our economic strategy relies on our natural environment being the absolute best it can be. We have delivered many initiatives over the years working closely with local communities using innovative techniques such as "Appreciative Enquiry" to deliver our Stepping Stones to Nature scheme, the Green Minds initiative, the Building Resilience in Communities flood protection programme and most notably our Plymouth and South Devon Community Forest which has already seen over 500 hectares of new woodlands planted, much of this within the proposed expanded Plymouth area, which will see tree canopy cover increase by 3% by 2050 and a total of 3,000 hectares of new trees and woodland created.
- Our commitment to growth comprises 30,000 sqm of commercial space, 8,000 jobs and the creation of over 1,000 new businesses.
- We are delivering 10,000 new homes in and around the city centre as part of a programme of £9 billion of public and private investment, creating 7,000 jobs linked to our regeneration programme.

 We are also developing a delivery strategy to meet the housing target for Plymouth and the expanded area, estimated to be in the range of 1,876 to 2,909 homes per annum.

### Why Devon Needs Fundamental Public Service Reform

#### 4. The 1974 Settlement No Longer Fits

- 4.1. Devon's current governance structure dates from the Local Government Act 1972, implemented in April 1974. That reform was designed for a different world. Despite the clear benefits identified in the 1969 Radcliffe-Maud Royal Commission on Local Government in England (Cmnd. 4040) of the benefits of a system of unitary government in England the recommendations were set aside largely for political reasons. The Act aimed to end the artificial separation of towns from their surrounding areas, creating standardised two-tier structures across England. Fifty years later, the world that reform addressed has fundamentally changed
  - The economic base has shifted from manufacturing to services.
  - The population has aged dramatically.
  - Digital technology has transformed how people live and work.
  - Travel patterns, housing markets, and economic geography bear little resemblance to 1974.
- 4.2. The boundaries drawn then increasingly fail to match how Devon functions today.
- 4.3. More significantly, further change is inevitable. Devon faces ongoing demographic pressure as the population continues to age, with those aged 65 and over projected to grow significantly. Digital transformation will continue reshaping service delivery whilst raising expectations for responsive, integrated services. Economic geography will keep evolving as Exeter grows and Plymouth expands, whilst rural and coastal areas face distinct challenges around seasonal employment, housing affordability, and service accessibility. Health and social care integration demands will intensify as the NHS Long Term Plan embeds Integrated Neighbourhood Teams.
- 4.4. The opportunity to complete this transformation is now, whilst these systems are in flux and can be designed to work together from the start. Disruption and risk are coming regardless, the question is not whether Devon experiences this disruption, but whether Devon shapes it or is shaped by it. Acting now means building governance that matches how communities actually function, that operates at the right scale to deliver complex statutory services whilst maintaining genuine accountability, and that creates the capacity for genuine public service reform from the foundation rather than attempting it through boundaries designed in a different era.

#### Why the Two-Tier System Fails Across Devon

4.5. We recognise that the case for local government reform applies across all of Devon and the proposal for Plymouth's expansion sits within a four-unitary model because we believe this is the only configuration that serves all parts of Devon effectively. Understanding the challenges facing Exeter, Torbay, and rural Devon is essential to demonstrating why four unitaries is the right answer for the county. A four-unitary model allows for three growth-orientated urban authorities to drive economic development and regeneration, working closely with a South West Peninsula Mayoral Strategic Authority, alongside a strong rural focussed Devon Coast

- and Countryside unitary authority that can develop place-based bespoke models of service delivery for dispersed communities.
- 4.6. Fragmented strategic planning is perhaps the most visible failure of the current system. Housing, transport, and economic development decisions are split between multiple tiers and multiple authorities, making coherent delivery almost impossible. The difficulties experienced with the Greater Exeter Strategic Plan provide a stark illustration. Despite genuine commitment from all parties to work together, the existing dynamics of local government ultimately frustrated the very collaboration it needed. When well-intentioned councils find it structurally impossible to plan together effectively, the system itself is the problem. A four-unitary model is the most optimal to achieve the strategic planning benefits from the Government's planning reforms, which will see the introduction of Spatial Development Strategies to drive growth.
- 4.7. The duplication inherent in two-tier governance wastes money at precisely the time when all councils face severe budget pressures. Multiple sets of elected members, multiple management teams, multiple corporate functions, and multiple separate back-office operations exist for services that could and should be integrated. Residents pay for this duplication through their council tax whilst receiving a more complicated, less responsive service. The confusion about which council is responsible for what service weakens democratic accountability. When residents do not know whether to contact the county or the district about a problem, civic engagement suffers and councils become more remote from the communities they serve.

#### **Different Places, Fundamentally Different Needs**

- 4.8. Local government reform must recognise that Devon is not one uniform place. The current Devon County Council area masks profound variations in need and circumstance beneath county-wide averages. Income deprivation stands at 17.1% across the Devon County Council area, compared to 24.4% in Plymouth and 26% in Torbay. But these averages conceal extreme variations. Exeter contains wards with health deprivation ranking 287th nationally, whilst rural areas like Monkleigh and Putford rank first nationally for barriers to housing and services. Some market towns enjoy substantial affluence whilst coastal communities face concentrated deprivation and isolation.
- 4.9. Services designed at county scale for populations of 800,000 cannot respond effectively to this granular variation. Commissioning based on county averages systematically underprovides in areas of highest need whilst potentially over-providing elsewhere. True equity means tailoring services to distinct patterns of need, not imposing uniform approaches that work nowhere well.

### The Challenge Facing Exeter

4.10. Exeter faces a particular set of challenges that the current system cannot address. The city is experiencing rapid population growth, driven by Exeter's success as a knowledge economy hub, home to a world-class university, the Met Office, and thriving digital and professional services sectors. Yet the city is constrained by a boundary defined decades ago that bears no relation to how modern Exeter actually functions. Exeter has been held back by Devon County Council as highway authority by not having direct control over the ability to align transport policy and transport infrastructure with its significant growth plans.

- 4.11. The reality of Exeter extends far beyond its administrative boundary. Some 37,000 people commute into the city daily for work. The Exeter Housing Market Area closely matches the local economic market area, and both align with what has become the second-largest travel-to-work area in England after Cambridge. Current development strategies already recognise this functional reality.
- 4.12. The Exeter Plan includes 14,000 new homes within the city boundary by 2041, whilst Teignbridge and East Devon have designated areas on the city's outskirts for 30,500 more homes. These neighbouring developments functionally extend the city. Many residents living in these new homes will consider Exeter their home, work in the city, use its services, and identify with it. Yet governance remains fragmented across multiple authorities, none of which can plan coherently across the area that actually matters.
- 4.13. This fragmentation has real consequences for housing delivery and strategic planning. Exeter needs the ability to coordinate planning, transport, and infrastructure across its functional economic area. It needs to be able to invest in the capacity and connectivity that will support continued growth.

### Why Torbay Should Expand Its Unitary Authority

- 4.14. Torbay provides crucial evidence for the four-unitary model whilst demonstrating why modest expansion strengthens rather than changes a successful approach. The authority has operated successfully as a unitary for over two decades, proving that focused governance of coherent communities delivers excellent services. Children's Services rated Good by Ofsted, innovative health and social care integration, and performance on delayed transfers of care dramatically better than the national average all demonstrate what a dedicated unitary authority can achieve. The authority's distinct identity as the English Riviera creates a clear sense of place that residents recognise and value.
- 4.15. However, Torbay's current compact geography of just 63 km<sup>2</sup> and population of approximately 140,000 creates constraints that expansion would address. With a significant growth agenda focussed on photonics and micro-electronics, fishing and tourism, health care and creative industries the existing boundary represents a major constraint on strategic planning to provide land to support these key economic sectors.
- 4.16. With approximately 27% of its population aged 65 or over, the authority faces sustained demand for adult social care and health services that will intensify as the population continues to age. The area experiences high deprivation levels in some coastal wards whilst simultaneously managing a tourism sector that operates across a wider functional economic area than the current boundary contains. Balancing regeneration investment with service provision for vulnerable populations requires both the local knowledge Torbay possesses and the financial resilience that a larger tax base provides.
- 4.17. Expanding Torbay to approximately 220,000 population through modest boundary modifications into neighbouring areas with strong functional connections would maintain everything that works about the current model whilst building capacity for future challenges. The expansion would increase the tax base by approximately 67%, providing the enhanced revenue capacity needed to sustain innovative approaches to integrated care without requiring unsustainable efficiency gains. The larger scale enables continued investment in

- prevention and early intervention whilst managing demographic pressures. Critically, expansion preserves Torbay's distinct coastal character and focused governance model.
- 4.18. The authority maintains the proximity to communities that enables its proven service delivery approach whilst gaining the financial resilience necessary for long-term sustainability. This validates the principle that unitary authorities should serve communities with genuine shared identity, expanded to their natural functional extent rather than constrained by boundaries that no longer match economic and social reality.

### The Distinct Challenges of Rural and Coastal Devon

- 4.19. Devon's rural and coastal areas face fundamentally different challenges than the urban centres of Plymouth, Exeter, and Torbay. With a population density of just 124 people per square kilometre compared to Plymouth's 3,311, these areas require service delivery models designed explicitly for geographic dispersion rather than urban concentration. Every service becomes inherently more expensive to deliver when populations are scattered across vast distances rather than concentrated in towns and cities.
- 4.20. Rural areas face particular challenges where service delivery must overcome fundamental geographic constraints. Market towns like Barnstaple, Tiverton and Tavistock serve as centres for surrounding villages and dispersed communities, yet current governance fragments service delivery and prevents integrated place-based planning. Adult social care services must reach an older demographic across enormous distances, with over 25% of residents aged 65 or over in many rural areas, whilst a road network stretching to 24,556 kilometres requires constant maintenance across challenging terrain. This geography demands sophisticated workforce planning to manage staff across wide areas whilst controlling significant mileage and travel costs, making environmental services, waste collection, planning and economic development inherently more expensive per head. Current arrangements add complexity and expense rather than enabling strategic commissioning at the right scale for these dispersed communities.
- 4.21. Rural Devon has a distinct economic base built around agriculture, food production, rural tourism and small businesses, with workforce patterns and skills needs that bear little resemblance to urban Plymouth or Exeter. Market towns, villages and dispersed communities each require different approaches to service delivery than suburban areas, with economic development priorities shaped by their particular geography and circumstances. Devon's geography creates profound variations across these rural and coastal communities, and they deserve governance that understands and responds to their specific needs rather than imposing urban models or treating them as an afterthought.
- 4.22. A purpose-designed Devon Coast and Countryside authority would enable locality-based delivery through market town hubs, strong partnerships with parish councils, and commissioning strategies that work with small and medium-sized local providers who understand rural communities.

#### **Creating the Right Scale for Modern Service Delivery**

4.23. The question of scale matters, but not in the way traditional arguments suggest. Recent research on adult social care analysed performance across all English upper tier authorities and found no correlation between authority size and service quality. Authorities serving

- populations from 100,000 to 300,000 achieve outcomes across the full range of performance, as do authorities above 500,000.
- 4.24. The research identifies that scale provides advantages in managing fixed costs, data systems and specialist commissioning, but these benefits plateau rapidly. Beyond that threshold, size introduces diseconomies through bureaucracy and the loss of local knowledge that enables effective prevention.
- 4.25. Critically, the research identifies that local connection is a prevention superpower.

  Authorities operating at appropriate scales demonstrate particular strengths in community-based prevention, housing and neighbourhood integration, and working with voluntary organisations.
- 4.26. The NHS 10 Year Health Plan proposes Integrated Neighbourhood Teams delivering care. Making this work requires local authorities operating at scales that enable both strategic commissioning and neighbourhood delivery which can be delivered in a four unitary model.

#### Why Four Unitaries Is the Right Answer

- 4.27. Having considered the distinct challenges facing different parts of Devon, Plymouth has concluded that four unitary authorities is the only model that delivers effectively for all areas. Four unitaries recognises that Plymouth, Exeter, Torbay, and rural Devon have fundamentally different service needs, economic drivers, and demographic profiles that require tailored governance rather than one-size-fits-all approaches. The model aligns with functional economic areas and travel-to-work patterns, enabling coherent strategic planning rather than the current fragmentation. It builds on the proven success of Plymouth and Torbay as existing unitary authorities, extending these benefits to Exeter whilst creating a purpose-designed authority for rural and coastal communities.
- 4.28. Four unitaries with modest boundary modifications enables each authority to focus on its distinct priorities whilst collaborating through the South West Peninsula Mayoral Strategic Authority on regional issues. Plymouth can serve its growth area effectively. Exeter gains the governance structure it needs to manage rapid growth. Torbay continues its proven model. Devon Coast and Countryside provides purpose-designed rural governance. Each authority is large enough to deliver complex statutory services, withstand financial shocks, and achieve economies of scale, yet small enough to maintain genuine accountability to local communities.

#### **Aligning with Public Service Partners**

4.29. The Devon Integrated Care Board is transitioning into a cluster with Cornwall. This creates a genuine opportunity to demonstrate how local care partnerships, neighbourhood health models and family-focused working can deliver better outcomes. Plymouth has already demonstrated the value of this approach through its Wellbeing Hubs and Family Hubs, operating a "no wrong door" model through locality networks that provide seamless, integrated support across health, social care and community services. The move to place-based working across the Devon and Cornwall cluster gives us the chance to build on this foundation and as the system reconfigures, there is a real opportunity to anchor this work in place-based delivery that responds to local need rather than organisational boundaries.

- 4.30. In policing there is opportunity to ensure that local authorities can work effectively with Devon and Cornwall Police in ways that genuinely reflect how communities function. Devon sits within the Devon and Cornwall Police area, which covers 1.82 million residents across the largest road network of any force in England. Policing priorities need to connect directly with the issues people raise most often, whether that is antisocial behaviour in town centres, rural crime or safeguarding vulnerable people. Four unitary authorities create the right scale for effective partnership working, where police resources and neighbourhood teams can work with councils, health services and voluntary organisations to tackle repeat offending, support repeat victims and address problem locations. The reorganisation gives us the chance to create governance that enables place-based collaboration on community safety.
- 4.31. Devon and Somerset Fire and Rescue Service already operates through 83 fire stations organised into clear geographical areas, so the local government reorganisation will have limited impact on their operational model. Their existing geographical structure and strong partnership working with local authorities, health services and community organisations means they are well positioned to continue their work regardless of boundary changes.

#### Seizing the Moment for Transformation

- 4.32. This rare alignment of transformation across multiple public services creates a window that will not reopen. Designing these systems together now means they can work as an integrated whole from the start, whilst delay condemns Devon to years of attempting to retrofit neighbourhood teams onto governance that does not match functional communities. The disruption and risk are coming regardless through NHS transformation, police governance changes and employment programme implementation, so the opportunity is to complete this transformation properly whilst the systems are in flux and choice remains about how they fit together.
- 4.33. This is Plymouth's answer to Devon's local government challenge because it is the only model that works for all parts of the county. It replaces artificial boundaries from 1974 with structures that match how Devon actually functions in 2025, creating authorities at the right scale to be responsive to communities whilst large enough to deliver statutory services effectively. It recognises that different places need different approaches rather than imposing county-wide uniformity on incompatible geographies. Most importantly, it provides Devon with governance structures designed for the next fifty years of change, built on the foundation of genuine public service reform and delivered through the moment of transformation when creating the right structures is still possible. The moment to act is now.

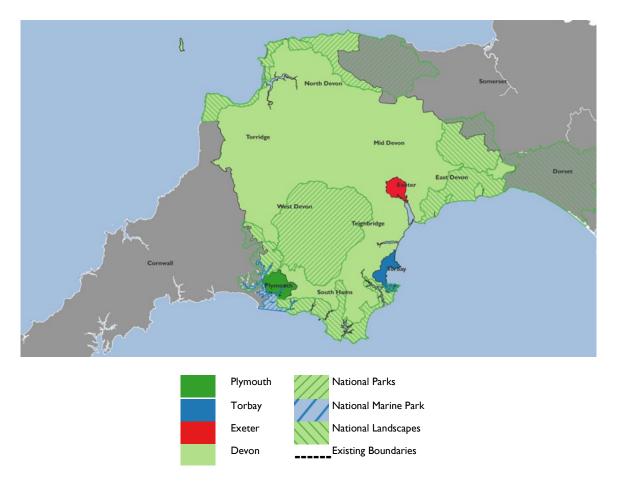
## The Base Proposal for Local Government in Devon

- 5.1. It is a requirement under the 2007 Act to base a proposal on whole district building blocks. This section sets out our base case in response to the Secretary of State's invitation issued on 05 February 2025 (and taking account of the feedback on the Plymouth's Interim Plan set out in the letter of 15 May 2025).
- 5.2. Our base case for local government reorganisation in Devon is as follows:
  - Plymouth City Council as a continuing unitary authority with a population of approximately 270,000 based on its existing unitary council boundary.
  - Exeter City Council as a new unitary authority with a population of approximately 135,000 based on its existing administrative boundary.
  - Torbay Council as a continuing unitary authority with a population of approximately 139,000 based on its existing unitary council boundary.
  - Devon as a new unitary council with a population of approximately 697,000 based on its existing county boundary, excluding the City of Exeter.

### How the Base Proposal Meets the Government's Criteria

5.3. This option represents the current local government structure, serving as a legally compliant baseline for comparison. However, the analysis demonstrates it is a fundamentally suboptimal arrangement, characterised by a profound imbalance between a single, dominant rural authority (Devon) and three geographically constrained urban unitary authorities (Plymouth, Torbay, and Exeter). This structure perpetuates existing constraints on growth and creates an imbalanced partnership for devolution purposes.

Figure 5.1



### **Base Case Assessment**

Table 5.1

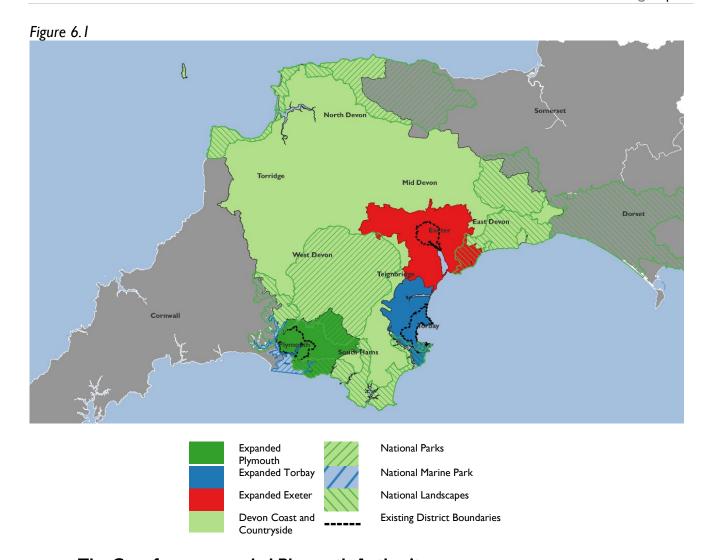
Government Criteria	Assessment	Rationale
I. Single tier of local government	Met	<ul> <li>Creates 4 unitary councils using the existing principal authorities as building blocks.</li> <li>Meets the Government's invitation to set out a base case on whole districts.</li> <li>Removes the existing two-tier county and districts currently in Devon.</li> </ul>
2. Right size and financial resilience	Not Met	<ul> <li>Creates authorities of uneven population size and financial resilience.</li> <li>Risk pooling is unevenly spread across the region.</li> </ul>
3. High-quality, sustainable services	Partially Met	<ul> <li>Maintains service continuity, but uneven population sizes may make collaboration more variable.</li> <li>Does not maximise opportunities for growth in Plymouth.</li> </ul>

4. Local collaboration and responsiveness	Partially Met	<ul> <li>Provides for recognised and legally coherent administrative boundaries but does not respond to concerns and issues raised during the Plymouth's Big Conversation engagement or Exeter and Torbay's local government reorganisation engagements.</li> <li>This option is not supported by any of the Devon local authorities</li> </ul>
5. Support for devolution	Partially Met	<ul> <li>Creates a group of constituent authorities across Devon to link into a South West Peninsula Mayoral Strategic Authority (to which Cornwall Council could be added).</li> <li>The absence of Ministerial modifications for Plymouth, Exeter and Torbay would place significant pressure upon any future Mayoral Strategic Authority who will be responsible for bringing forward the Spatial Development Strategy and growth options.</li> <li>Potential perceived imbalance at the Mayoral Strategic Authority due to variations in unitary council size.</li> </ul>
6. Community engagement	Met	<ul> <li>Maintains a foundation of existing governance and neighbourhood engagement arrangements in each of the unitary authorities.</li> </ul>
Our Principles for Local Government in Devon		
I. Financial viability and population	Not Met	<ul> <li>Whilst as continuing authorities Plymouth and Torbay are viable unitary councils, their current populations are insufficient to generate the financial base required for long-term viability and resist financial shocks.</li> <li>Exeter is not viable as a unitary council on its existing boundary.</li> <li>The new Devon Coast and Countryside unitary council would be of a sufficient size to be financially viable, but disproportionately large compared with the three other unitary councils in this option.</li> </ul>
2. Character and identity	Met	The Base Case preserves the distinct, compact urban character, which is reflected in high population density of the urban centres of Plymouth, Exeter and Torbay with a rural authority based upon the existing county council area (excluding Exeter).
3. Respect for boundaries	Met	This option respects the boundaries of existing unitary authorities.

4. National Parks/National Landscapes	Met	<ul> <li>The existing boundaries of Plymouth, Exeter and Torbay do not impinge National Parks or create governance complexities for the Park Authority.</li> </ul>
5. Parish boundaries	Met	<ul> <li>This option proposes no changes and therefore does not alter any existing parish boundaries.</li> </ul>
6. Sustainable growth and strategic role	Not Met	<ul> <li>The geographic constraint of 79.9 square kilometres prevents strategic growth opportunities, inhibiting Plymouth's capacity to fulfil its strategic regional and national role.</li> <li>Similarly in Exeter, at just 47.0 square kilometres, there are already severe spatial limitations on its strategic hub role. At 62.9 square kilometres, Torbay's future capacity to grow is significantly constrained.</li> </ul>

## The Modified Proposal for Local Government in Devon

- 6.1. We request a Ministerial modification to our base case proposal because this will deliver longer-term benefits in proactively working with the South West Peninsula Mayoral Strategic Authority to drive growth. Our proposal, which reflects our vision for local government, is for there to be 4 unitary councils covering the Devon area as follows:
  - An expanded Plymouth Council comprising the unitary council of Plymouth City
    Council as a continuing authority with a population of approximately 270,000 with a
    ministerial modification to include 13 parishes all within the current district of South Hams
    District Council of resulting in a population of approximately 300,000.
  - An expanded Exeter Council comprising a new unitary council based on the current Exeter City Council boundary with population of approximately 135,000 with a Ministerial modification to extend this with 15 parishes from within Teignbridge District Council, 28 parishes from within East Devon District Council and 6 parishes from within Mid-Devon District Council resulting in a population of approximately 260,000.
  - An expanded Torbay Council comprising the unitary council of Torbay as a
    continuing authority on its existing boundaries with a population of approximately 139,000
    with a modification comprising of 23 parishes from within Teignbridge District Council
    and South Hams District Council resulting in a population of 220,000.
  - A Devon Coast and Countryside Council comprising a new unitary council covering the rest of the former Devon County Council area, resulting in a population of approx. 460,000.
- 6.2. The proposal for 4 unitary councils to replace the existing county council and 8 district councils is shown on the map below:



### The Case for an expanded Plymouth Authority

- 6.3. Plymouth and the surrounding parishes share many challenges and opportunities which have been understood and developed through collaborative strategic planning, demonstrated through the successful Joint Local Plan which demonstrates existing, effective partnership working across Plymouth and the communities of the South Hams.
- 6.4. The future council will maintain Plymouth's commitment to protecting the most vulnerable whilst ensuring consistent quality standards for all residents and businesses. Building on our mission to make Plymouth a fairer, greener city where everyone does their bit, the expanded authority will help realise our shared ambition for a city region that tackles inequality, drives prosperity and growth, maintains safety and attractiveness, promotes health and wellbeing, supports independence for older residents, and creates opportunities for children, young people, and families to thrive.
- 6.5. We want the expanded Plymouth Authority to be a place where everyone has a great start to life, people live healthy and fulfilling lives, are enabled to achieve their full potential and contribute to their community, with an ambition that no one is left behind.
- 6.6. This means that for the residents in the expanded Plymouth area -

- Children and young people are safe and feel safe and confident.
- Everyone benefits from education, skills and employment opportunities that help them succeed in life.
- Everyone lives healthy, active, and fulfilling lives, and makes good choices about their wellbeing.
- Everyone gets the health and social care support and information they need at the right time and place.
- Communities are welcoming and supportive, especially of those most in need, and people feel able to contribute to community life.
- 6.7. Our ambitions for our place are that:
  - Plymouth is at the heart of the national defence, marine autonomy and wider growth ambitions for the South West region delivering long-term opportunities for young people.
  - Rural heritage is recognised and cherished.
  - Residents live in clean, safe, and green communities, where people and organisations embrace their environmental responsibilities.
  - Journeys across the area are easier, more predictable, and safer.
  - Everyone has a place they can call home, with appropriate housing for all.
  - Businesses in the area start up, thrive, and grow.
  - Well-connected communities, with effective infrastructure, grow sustainably.
  - The unique character and identity of both urban Plymouth and rural parishes is maintained and celebrated.
- 6.8. Unitary local government provides a stronger foundation for delivering on these ambitions. It will enable us to bring the functions currently divided between different authorities together. We will transform how we work and use of convening power with other public services, enabling us to focus more effectively on the delivery of our shared ambitions.

## **How the Four-Unitary Model Delivers**

- 7.1. We propose to deliver four councils and one connected Devon which:
  - Delivers genuine high-quality and effective strategic leadership of place, recognising the role of urban settlements as regional centres and economic hubs.
  - Delivers accessible, efficient, effective, and responsive services to people that seeks to tackle inequalities and deprivation.
  - Delivers a system of local governance that acknowledges the relationship and interdependencies between city and surrounding towns and villages and ensures that this governance still remains genuinely local to where people live.
  - Delivers high quality services that addresses the specific needs of individual neighbourhoods and parishes, empowering local people and their representatives to inform the design and delivery of services and the setting of policies and priorities.

#### The future of the Devon and Torbay Combined County Authority

- 7.2. As set out in our joint letter of July 2025 from the Leaders of Plymouth City Council, Torbay Council, Devon County Council, and district councils across Devon we propose that the Devon and Torbay Combined County Authority should be retired and replaced by a new South West Peninsula Mayoral Strategic Authority (MSA). This MSA would encompass Plymouth City Council, Torbay Council, and the successor unitary authorities in Devon following local government reorganisation.
- 7.3. The proposed four unitary councils, including the expanded Torbay unitary council and the new Coast and Countryside unitary council, will continue to exist and deliver local services, preserving their sovereignty, culture and identity. The MSA would provide strategic governance for the region of 1.2 million people and £25 billion economy, enabling us to maximise our exceptional environmental assets, coordinate our £2 billion tourism economy, address housing pressures, create integrated transport networks, and support critical national infrastructure at Devonport dockyard.
- 7.4. The functions currently held by the Combined County Authority would transition to the new MSA, ensuring continuity of strategic coordination while enabling the enhanced devolution powers and funding associated with a mayoral model. As stated in our July 2025 joint letter, we believe the Combined County Authority should be retired in advance of the new MSA being established. This approach ensures that local government reorganisation and devolution proceed in a coordinated manner that maximises the potential of our combined region.

## Why Boundary Modifications in Devon Are Essential

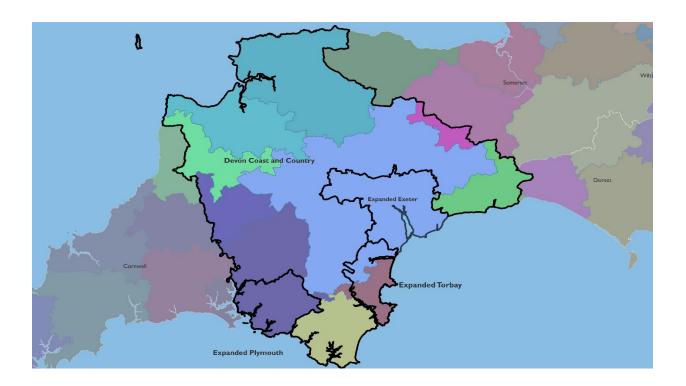
#### The Strategic Role of Medium-Sized Cities in National Economic Growth

- 8.1. City size alone does not guarantee economic success. Many of the UK's largest cities outside London have underperformed economically demonstrating that prosperity stems from factors such as leveraging local assets, creating strategic connections, and developing approaches tailored to unique strengths.
- 8.2. A recent report by Inner Circle (September 2025) entitled "A Case for Cities in Local Government Reorganisation and English Local Government" advocates for a multi-hub approach to growth by focussing on a connected network of high-performing cities on expanded boundaries more capable of driving delivery and shaping strategy from the ground up.

#### **Strategic Importance Through Specialisation**

8.3. Medium-sized cities can create distinctive economic advantages that larger urban centres cannot easily replicate. This is exemplified by specialised assets like Devonport dockyard, a crucial national defence installation that demonstrates how focused development around core competencies can elevate a city's importance far beyond that which its population size might suggest. The recent designation of Plymouth as the National Centre for Marine Autonomy equally demonstrates this.

Figure 8.1 South West Travel to Work Area



8.4. Such strategic assets serve dual purposes, anchoring regional economic systems while simultaneously fulfilling critical national priorities. This dual role makes them particularly valuable in balanced regional development strategies.

#### **Administrative Boundaries and Economic Reality**

- 8.5. Current administrative structures often fundamentally misalign with functional economic areas, creating significant inefficiencies in governance and service delivery. Boundary extensions represent a strategic approach to addressing these challenges, offering more coherent frameworks for spatial planning, infrastructure coordination, and public service delivery.
- 8.6. This approach aligns with progressive thinking in urban development, which emphasises understanding cities as interconnected systems rather than isolated entities. Effective governance and economic growth depend on aligning administrative structures with the actual economic and social relationships that define a region or sub-region.

#### A Model for Regional Development

- 8.7. Strategic boundary realignment delivers -
  - Strategic decisions about new housing and employment over a wider geographical area, delivering more sustainable larger-scale solutions to drive the ambitious growth agenda for the city.
  - The ability to protect and enhance nationally important landscapes while delivering growth.
  - Enhanced support for key economic sectors.
  - More strategic investment attraction.
  - Responsive, integrated public services.
  - Improved regional connectivity and transportation planning.
  - Overcoming barriers to growth caused by different policy environments.
- 8.8. Medium-sized cities with specialised assets offer a compelling model. Strategic boundary changes are not about expansion for expansion's sake, but about creating more effective, responsive, financially sustainable, and economically vibrant urban systems that better serve communities and drive regional prosperity.

## **Creating the Right Solution for All Devon**

9.1. Plymouth's boundary extension delivers benefits for the city and surrounding communities, but it forms part of a wider solution that must work for all of Devon.

### Why Exeter Needs Unitary Status

- 9.2. Exeter faces challenges that parallel Plymouth's in important ways yet reflect the city's distinct character and circumstances. As Devon's fastest-growing urban area, Exeter is constrained by a boundary that no longer reflects the city's functional reality. The numbers tell a compelling story. Population growth of 5.9% compared to the national average of 3.8% demonstrates Exeter's success as an economic centre, but this growth creates pressures that current governance structures cannot address effectively. With 37,000 people commuting into Exeter daily, the city's economic footprint extends far beyond its administrative boundary. The Exeter travel-to-work area has become the second largest in England after Cambridge, yet governance remains fragmented across Exeter City Council and three surrounding district councils.
- 9.3. The housing challenges facing Exeter provide perhaps the clearest illustration of why the city needs unitary status with boundary extensions. The Exeter Plan proposes 14,000 new homes within the city boundary by 2041, but Teignbridge and East Devon have designated areas on Exeter's outskirts for a further 30,500 homes. These are not separate developments they are functional extensions of Exeter where residents will work in the city, use its services, and consider it their home. Yet planning these developments requires coordination between multiple authorities with different priorities, timescales, and democratic mandates. The difficulties experienced with the Greater Exeter Strategic Plan demonstrate that even well-intentioned collaboration cannot overcome the structural barriers inherent in two-tier governance.
- 9.4. Exeter needs the ability to plan strategically across its functional economic area, coordinating housing, transport, and infrastructure investment coherently. The city needs to be able to invest in the capacity and connectivity that support continued growth as a knowledge economy hub. As home to a world-class university, the Met Office, and thriving digital and professional services sectors, Exeter has strengths that benefit all of Devon. However, realising this potential requires governance structures that match the city's ambitions. Creating Greater Exeter Council with modest boundary extensions would enable strategic planning across the area that matters, accelerating housing delivery and supporting the economic growth that Devon needs.

#### Why Torbay Should Expand its Unitary Authority

9.5. Torbay has operated successfully as a unitary council for over two decades, demonstrating that smaller authorities can be effective, but its potential is constrained by its current size. Expanding the unitary area would allow an authority serving coherent communities with a broader shared economic and geographical identity to deliver even more efficient and robust services. Torbay's compact geography of just 63 square kilometres and its small population of approximately 140,000 creates challenges of scale when delivering major infrastructure projects and complex strategic services. Expansion into neighbouring areas with strong functional ties would unlock significant administrative and financial efficiencies.

- 9.6. Torbay faces distinct challenges that require governance at a larger, more resilient scale. An ageing demographic with approximately 27% of residents over 65 creates sustained demand for adult social care and health services, which would benefit from a larger pooled resource base achieved through expansion. The tourism sector, supporting 8,000 jobs, operates as part of a wider "English Riviera" economic area that transcends the current unitary boundary; expanding the authority would allow for coordinated, strategic management of the entire regional tourism economy. Coastal deprivation in some wards sits alongside more prosperous areas, and larger-scale governance could better implement comprehensive regeneration strategies by pooling business rates and attracting greater external investment. Torbay's existing innovative approaches, particularly in health and social care integration, would be strengthened and more efficiently scaled by expanding the authority to serve a wider population base alongside its strong existing partnerships.
- 9.7. Torbay should expand for compelling reasons. First, while Torbay's current track record validates the principle of effective unitary governance, expanding it validates the principle that strategic scale is critical for modern public service delivery and resource management. Second, expansion would build upon Torbay's established governance and innovative approaches, allowing them to be applied across a wider, functionally connected region, delivering significant economies of scale that are currently unavailable. Third, expanding the authority to reflect the true functional economic and geographic extent of the "English Riviera" would create a more robust authority that can better advocate for and fund its distinct coastal and demographic profile. Torbay should expand its unitary status because it is the logical next step to maximise its existing success and secure its long-term financial and service resilience.

### Why Devon Coast and Countryside Needs Purpose-Designed Governance

- 9.8. Devon's rural and coastal areas have needs that differ fundamentally from Plymouth, Exeter, or Torbay. Population density of just 124 people per square kilometre compared to Plymouth's 3,311 means that every service costs more to deliver per head. Market towns like Barnstaple, Tiverton, and Tavistock serve as centres for surrounding villages and dispersed communities across vast distances. An older demographic with over 25% of residents aged 65 or over creates sustained demand for adult social care delivered across challenging geography. The economic base built on agriculture, food production, rural tourism, and small businesses requires different support than urban economies focused on services and knowledge sectors.
- 9.9. These communities deserve governance designed explicitly for their needs rather than having urban models imposed or being treated as an afterthought in larger authorities dominated by urban populations. A purpose-designed rural authority can develop locality-based delivery through market town hubs, working closely with parish councils that are vital partners in rural governance. It can commission services from predominantly local small and medium-sized providers who understand rural communities rather than large national contractors better suited to urban contexts. It can focus investment on rural priorities including transport connectivity, supporting market towns, preventing costly residential care placements through community-based support, and maintaining the landscape and environment that defines rural Devon.

9.10. The scale of Devon Coast and Countryside enables strategic commissioning and specialist capacity whilst maintaining genuine connection to local communities. The authority will be large enough to deliver complex statutory services efficiently, employ specialist staff, and withstand financial shocks. Yet through locality working and strong parish partnerships, it can maintain the local responsiveness that rural communities rightly expect. This balance, scale where it matters for efficiency and resilience, locality focus where it matters for responsiveness and connection is why Plymouth's proposal creates a dedicated rural authority rather than attempting to incorporate rural areas into urban authorities or creating a structure that cannot serve either urban or rural needs effectively.

### How Four Authorities Work Together Through Regional Collaboration

- 9.11. The four-unitary model creates authorities that are individually effective and collectively capable of addressing regional priorities. Each authority will focus on its distinct challenges and opportunities, Plymouth on defence-led growth and urban regeneration, Exeter on rapid growth management and knowledge economy development, Torbay on coastal regeneration and age-friendly services, Devon Coast and Countryside on rural sustainability and dispersed service delivery. This focus enables tailored governance that reflects genuine differences across Devon rather than imposing standardised approaches that serve no area well.
- 9.12. However, some challenges require collaboration beyond individual authority boundaries. Strategic transport infrastructure, economic development, skills provision, and major housing growth all benefit from coordination across larger geographies. This is where the South West Peninsula Mayoral Strategic Authority becomes crucial to the model's success. Four balanced constituent councils, each serving coherent communities with distinct identities, can work together effectively on regional priorities whilst maintaining genuine local accountability. The four-unitary model provides the optimal foundation for Peninsula devolution because it creates constituent councils that are neither too large and remote nor too small and lacking capacity but appropriately sized for both local delivery and regional collaboration.
- 9.13. The proposal for four unitary authorities represents a solution that works for all of Devon, not just Plymouth. It recognises that different parts of the county have different needs that require tailored governance. It builds on proven success where it exists, particularly in Plymouth and Torbay's experience as unitary authorities. It addresses critical failures in current arrangements, particularly the boundary constraints affecting Plymouth and Exeter and the fragmentation hindering rural service delivery. Most importantly, it creates authorities that can work together on regional priorities whilst maintaining the local connection and accountability that effective democracy requires. This is why Plymouth recommends four unitaries with boundary modifications because it is the only model that serves all of Devon effectively.

# **Comparing the Options**

### **Options Considered at Interim Plan Stage**

10.1. In March 2025, Plymouth City Council submitted an Interim Plan to the Ministry of Housing, Communities and Local Government in response to the formal legal invitation issued on 05 February 2025. This initial submission was required by 21 March 2025, with final proposals due by 28 November 2025. The interim plan explored options for extending the city's boundaries to achieve the scale required for future sustainability under local government reorganisation.

### **Interim Plan Options Evaluated**

10.2. The interim plan considered four main options to address the Government criteria for an extension of the city boundary.

# Option I: Extended City Boundary Based on Plymouth Growth Area (Recommended)

- 10.3. This option was recommended to Cabinet and endorsed by Council as the preferred approach. The option proposed a modest boundary extension based on the Plymouth Growth Area geography. This was considered to best meet the principles for local government reorganisation whilst balancing the need for scale with preservation of Plymouth's identity and neighbouring community identities.
- 10.4. The Growth Area approach focused on functional economic relationships and growth potential, creating a coherent geography for strategic planning and service delivery. This option was selected as the basis for submission to Government as Plymouth City Council's preferred approach.

# Option 2: Extended City Boundary Based on Local Care Partnership Western NHS Locality (Rejected)

- 10.5. This option would have aligned the city boundary to the provision of health care services by the Local Care Partnership. The option was assessed as having potential to meet the Government's six criteria for unitary government. However, further work would have been required to demonstrate this potential as the option conflicted with known proposals for local government reorganisation in the rest of Devon.
- 10.6. The option was rejected on the basis that it conflicted with some of the principles for local government reorganisation and with proposals emerging from other Devon authorities.

# Option 3: Extended City Boundary Based on Plymouth Housing Market Area (Rejected)

10.7. This option was based on the part of the Housing Market Area identified through preparation of the Plymouth and South West Devon Joint Local Plan, adopted in March 2019. The option was assessed as having potential to meet the Government's six criteria for unitary government, but again further work would have been required to demonstrate this as it conflicted with known proposals for local government reorganisation in the rest of Devon.

10.8. The option was rejected because it would have created an unwieldy area for service delivery and was assessed as being in conflict with the principles for local government reorganisation.

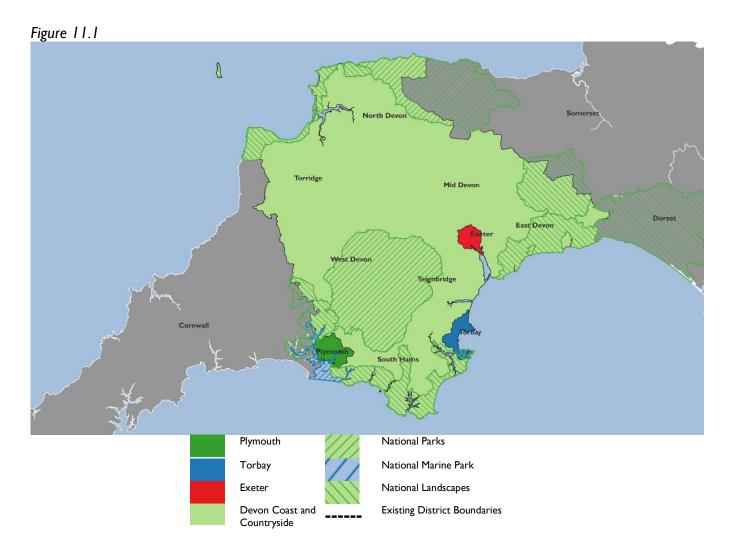
### **Council Decision**

10.9. On 17 March 2025, Plymouth City Council endorsed Option I as the preferred approach and approved submission of the Plymouth Local Government Reorganisation Interim Plan to Government. The Council also agreed to commission expert advice and support to develop the detailed evidence base for the final proposals due in November 2025.

### **Subsequent Development**

10.10. Following submission of the Interim Plan in March 2025, the Government responded with a letter dated 15 May 2025 providing feedback. This feedback informed the development of the detailed options analysis presented in the final proposal, which refined and expanded on the Growth Area concept to create what became the Expanded Plymouth option in the Four Unitary option.

# Option One: Four Unitaries on District Boundaries (Base Case)



# **II.Summary Assessment**

11.1. Whilst this option meets the Government's minimum legal criteria, it is not designed for long-term success. The proposed structure is highly imbalanced, with Devon's population of 690,000 more than double that of Plymouth at 270,000. Three dense urban authorities operate with over 2,200 people per square kilometre, whilst one large rural authority has just 104. This option perpetuates existing barriers to growth and creates an unequal foundation for any future devolution partnership.

# Option One: Plymouth

Figure 11.2



### **Key Statistics**

11.2. Plymouth is a densely populated urban authority. It accommodates 270,000 people within a compact 79.9 km² area, resulting in a population density of 3,311 people per square kilometre. The council's responsibilities include managing a 1,046 km road network and a tax base of 76,557 Band D equivalent properties.

### **Demographic Profile**

Children (0-15 years)	17.4%
Working age (16-64 years)	64.1%
Older people (65+ years)	18.5%
Home ownership rate	57.7%
Social rented	20.5%
Private rented	21.8%

- 11.3. Compared to Torbay and Devon, Plymouth has a younger age profile, with a higher proportion of both children (17.4%) and working-age residents (64.1%). The city's lower home ownership rate of 57.7% is characteristic of its urban housing market.
- 11.4. At 3,311 people per square kilometre, Plymouth has the highest population density of any authority considered in this option, a direct result of its compact geography being

constrained by administrative boundaries. This small area of just 79.9 km<sup>2</sup> constrains spatial planning capacity and limits the tax base available to fund regional strategic development.

### **Indices of Deprivation 2025**

11.5. Plymouth has a population-weighted IMD rank of 15,067 (43.2% most deprived), ranking 68th out of 153 upper-tier authorities nationally, placing it in the more deprived half of English unitary authorities.

Category	Ward Name	National Rank
Most Deprived	St Peter and the Waterfront Devonport St Budeaux	88 575 706
Least Deprived	Plymstock Dunstone Plymstock Radford Southway	32,078 32,068 31,856
Domain	Ward	National Rank
Employment Deprivation Health Deprivation Crime Barriers to Housing & Services	St Peter and the Waterfront Devonport St Peter and the Waterfront St Budeaux	<b>83</b> 193 455 1,221

11.6. The city's current boundary imposes a structural constraint on its capacity to address concentrated need. With a Weighted IMD Rank of 15,067 (43.2% most deprived), Plymouth contains significant pockets of acute deprivation alongside more affluent areas. St Peter and the Waterfront ranks 88th most deprived in England, with Employment Deprivation at rank 83. Nearby Devonport holds the city's worst Health Deprivation position at rank 193. This pattern of concentrated challenges within a constrained tax base restricts the authority's ability to fund sustained intervention in priority wards whilst maintaining services across the whole city.

### **Service Implications**

- 11.7. The city's compact urban geography enables efficient service delivery through established structures and consistent models. While the authority operates with known capacity, its small scale is a major disadvantage and the limited tax base severely restricts investment.
- 11.8. This lack of resources is compounded by substantial service pressures, which are driven by high levels of health deprivation (decile 3) and child poverty (IDACI decile 4). The city's scale also makes it difficult to maintain a full specialist workforce, further limiting its ability to respond.
- 11.9. These pressures are felt across numerous key services. Children's services face high demand from child poverty, and adult social care must manage health deprivation alongside an ageing population. At the same time, SEND provision operates at a constrained scale, public health

- teams must address deep health inequalities, and housing services are forced to manage intense urban pressures.
- 11.10. Ultimately, the city's small geographic area of 79.9 km<sup>2</sup> prevents strategic growth and leaves it vulnerable to demographic and financial shocks.

### Financial Analysis

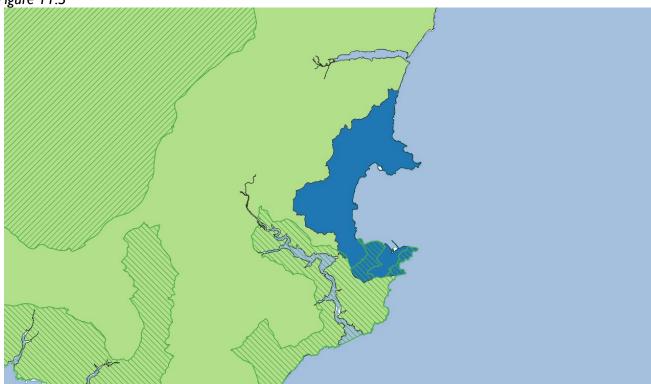
11.11. Plymouth's financial position is characterised by structural constraints. The tax base of 76,557 Band D equivalent properties serving 270,000 people must support higher than average service demands. The combination of health deprivation, child poverty, and compact urban geography creates service cost pressures that cannot be offset through economies of scale. The constrained boundary prevents access to growth areas that could expand the tax base, creating long-term sustainability concerns.

### **Critical Assessment**

11.12. The small geographic area of 79.9 square kilometres prevents strategic growth and leaves Plymouth vulnerable to demographic and financial shocks. This option fails to address the city's fundamental requirement for expansion into its functional economic area.

# Option One: Torbay

Figure 11.3



### **Key Statistics**

11.13. Torbay is a compact authority with a population of approx. 139,000 living within a 62.9 km<sup>2</sup> area, giving it a high population density of 2,215 people per square kilometre. The council is responsible for a 651 km road network and a tax base of 49,254 Band D equivalent properties.

### **Demographic Profile**

Children (0-15 years)	16.0%
Working age (16-64 years)	57.3%
Older people (65+ years)	26.7%
Home ownership rate	64.0%
Social rented	19.8%
Private rented	16.2%

11.14. Torbay has the oldest age profile in this option, with over a quarter of its population (26.7%) aged 65 or over. This creates significant demand for adult social care and health services, a challenge compounded by a smaller working-age population (57.3%) that constrains economic capacity. The area's character as a coastal resort is also reflected in its moderate home ownership rate of 64.0%.

11.15. The authority's population density of 2,215 people per km<sup>2</sup> is second only to Plymouth's. This density, combined with its small geographic footprint of 62.9 km<sup>2</sup> the smallest in this arrangement severely limits its capacity for growth and strategic development. These limitations are intensified by the natural constraints of the bay's geography.

### **Indices of Deprivation 2025**

11.16. Torbay has a population-weighted IMD rank of 12,484 (35.8% most deprived), ranking 39th out of 153 upper-tier authorities nationally, placing it in the most deprived third of English unitary authorities.

Category	Ward Name	National Rank
Most Deprived	Roundham with Hyde Tormohun	<b>404</b> 672
	Tormohun	811
Least Deprived	Cockington with Chelston Preston Churston with Galmpton	29,902 28,570 28,222
Domain	Worst Ward/Area	National Rank
Crime	Tormohun	127
Employment Deprivation	Roundham with Hyde	255
Health Deprivation	Roundham with Hyde	330
Income Deprivation	King's Ash	1,186

11.17. Torbay faces an acute mismatch between service need and financial capacity. With a Weighted IMD Rank of 12,484 (35.8% most deprived), the authority shows the highest concentration of deprivation among the urban unitaries. Wards like Roundham with Hyde (rank 404) and Tormohun contain some of England's most deprived areas, including the nation's 127th worst ranked LSOA for Crime Deprivation. The authority's small scale of 139,000 people and 49,254 Band D equivalent properties means these proven service models operate without the financial resilience needed to address persistent challenges or withstand demographic pressures.

### **Service Implications**

- 11.18. Torbay demonstrates remarkable capability, delivering high-quality outcomes through innovative strategies and strong partnerships. Key strengths include:
  - Children's Services rated Good (only one in Devon area)
  - o Integrated partnership with NHS for health and social care
  - o Proactive approach to improving employment, health, and wellbeing

### Financial Analysis

11.19. Torbay's financial position reflects the challenges of operating at small scale with high service needs. The tax base of 49,254 Band D equivalent properties serving 139,000 people must support significant adult social care demands from an ageing population (26.7% over 65), alongside health and employment deprivation both at decile 3. The compact 62.9 square

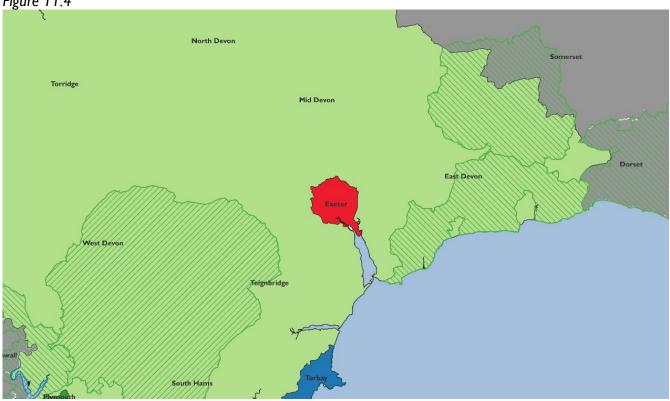
kilometre geography prevents expansion that could increase the tax base, whilst the coastal setting constrains development options.

### **Critical Assessment**

11.20. Whilst Torbay delivers high-quality outcomes through innovation, the authority's small scale creates long-term financial pressures. Sustainable delivery will require either enhanced resources or continued exceptional efficiency gains that may not be maintainable.

# Option One: Exeter

Figure 11.4



### **Key Statistics**

11.21. Exeter is a densely populated city, accommodating approx. 135,000 residents within a compact 47.0 km<sup>2</sup> area, which results in a population density of 2,782 people per square kilometre. As a future unitary authority, its responsibilities would include maintaining a 508 km road network and managing a tax base of 39,852 Band D equivalent properties.

### **Demographic Profile**

Children (0-15 years)	14.8%
Working age (16-64 years)	68.6%
Older people (65+ years)	16.6%
Home ownership rate	57.2%
Social rented	15.7%
Private rented	27.1%

11.22. Exeter's character as a university city is clear from its demographic profile. It has the youngest population, the highest proportion of working-age residents (68.6%), and the most professional and managerial jobs (34.6%) in this proposal. This creates a knowledge-focused economy but also shapes the housing market; lower home ownership (57.2%) and a high rate

- of private renting (27.1%) reflect the student and young professional population, which can in turn impact the availability of family housing.
- 11.23. The city's geography is its primary constraint. At just 47.0 km², Exeter is the smallest authority of any option considered, and its population density is high at 2,782 people per square kilometre. These severe spatial limitations restrict strategic planning and prevent the city from accommodating the growth needed to support its regional role and university partnerships.

### **Indices of Deprivation 2025**

11.24. Exeter has a population-weighted IMD rank of 19,949 (57.2% most deprived), currently ranking 187th out of 296 lower-tier authorities nationally, making it one of the least deprived districts in England.

<b>Exeter</b> (57.2%)	(Rank 19,949)	
Category	Ward Name	National Rank
Most Deprived	Priory	4,236
	St David's	4,425
	Priory	5,114
Least Deprived	Pennsylvania	33,044
•	Duryard and St James	31,782
	Pennsylvania	31,569
Domain	Worst Ward/Area	National Rank
Health Deprivation	St David's	287
Education, Skills & Training	Priory	458
Crime	St David's	755
Employment Deprivation	Priory	3,579
Barriers to Housing & Services	Exwick	6,695

- 11.25. Exeter faces the most severe spatial constraint of any urban authority in this proposal. At just 47 square kilometres, the boundary is inadequate for a city. With a Weighted IMD Rank of 19,949 (57.2% most deprived), Exeter is the least deprived urban authority overall, yet it contains significant challenges in specific areas. St David's ward holds the city's worst Health Deprivation position at rank 287. The fundamental problem is not deprivation levels but the inability to plan strategically. The tight boundary prevents the city from capturing its functional economic area or accessing growth opportunities necessary to support its knowledge economy and university partnerships.
- 11.26. The city's high skill levels and strong university partnerships are key drivers for economic development. However, the small population of 135,000 is a significant constraint, limiting the authority's capacity to deliver specialist services.

### Financial Analysis

11.27. Exeter's financial position is the most constrained of the urban authorities. With a tax base of only 39,852 Band D equivalent properties serving 135,000 people, the authority has the

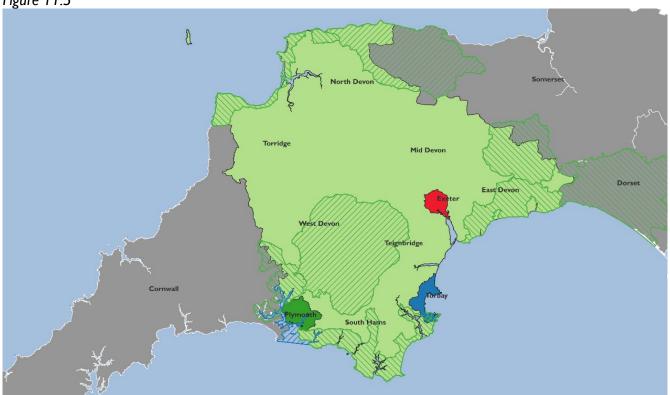
smallest financial base. Whilst low deprivation reduces some service cost pressures, the compact 47 square kilometre geography prevents access to growth areas that could expand the tax base. This creates a fundamental mismatch between Exeter's regional role and its financial capacity.

### **Critical Assessment**

11.28. Exeter faces the most severe spatial constraint of any urban authority. The 47 square kilometre boundary is inadequate for a city and prevents the strategic growth planning necessary to support its knowledge economy and university partnerships.

### Option One: Devon Coast and Countryside

Figure 11.5



### **Key Statistics**

11.29. Devon is a large, rural authority with a population of approx. 690,000 spread across a vast 6,522.2 km² area, resulting in a very low population density of just 104 people per square kilometre. The future council would manage an extensive 16,894 km road network and a tax base of 277,975 Band D equivalent properties.

### **Demographic Profile**

Children (0-15 years)	16.0%
Working age (16-64 years)	56.5%
Older people (65+ years)	27.6%
Home ownership rate	70.2%
Social rented	12.3%
Private rented	17.5%

11.30. Devon has the oldest age profile of any option, reflecting its character as a rural retirement destination. With the lowest proportion of working-age residents (56.5%) and the highest proportion of those over 65 (27.6%), the authority has one of the highest old-age dependency ratios. This imbalance places significant pressure on both public services and the local economy.

11.31. While the area has the highest rate of home ownership (70.2%), indicating settled communities, its economy is constrained by its demographics. Despite a solid rate of professional employment (30.9%), the small working-age population limits potential for growth. The authority's primary challenge, however, is the combination of an ageing population and a vast rural geography, which creates considerable and widespread demand for adult social care across its 6,522 km² area.

### **Indices of Deprivation 2025**

11.32. Devon Coast and Countryside has a population-weighted IMD rank of 17,542 (50.3% most deprived). Devon County Council currently ranks 101st out of 153 upper-tier authorities nationally, with a moderate overall position that contains significant internal variation.

Category	Ward Name	National Rank
Most Deprived	Barnstaple Central	1,570
-	Ilfracombe East	1,868
	Barnstaple with Westacott	2,387
Least Deprived	Woolwell	31,970
•	Tavistock South East	31,956
	Honiton St Michael's	31,352
Domain	Worst Ward/Area	National Rank
Barriers to Housing & Services	Monkleigh & Putford	1
Living Environment	Ashburton & Buckfastleigh	220
Health Deprivation	Barnstaple Central	572
Employment Deprivation	Barnstaple Central	1,717

11.33. This vast authority demonstrates how averaging across large geographies masks extremes. Whilst the overall position appears moderate, the authority contains England's most isolated rural area, with the Monkleigh & Putford LSOA ranking 1st nationally for Barriers to Housing and Services. Urban market towns like Barnstaple Central face Health Deprivation at rank 572 and Employment Deprivation at rank 1,717. The structure creates a fundamental problem: rural isolation and urban coastal deprivation require distinct service models, yet this configuration forces a single approach across incompatible geographies. The separation of urban resources from rural need prevents effective targeting of support where it matters most.

### **Service Implications**

- 11.34. The service delivery model is complex, reflecting the area's geography. It combines locality-based teams in market towns with mobile and outreach services for dispersed communities, supported by investment in digital and remote access. This approach requires sophisticated workforce planning to manage staff across a wide area and to control significant mileage and travel costs.
- 11.35. This option represents the current local government structure, serving as a legally compliant baseline for comparison. However, the analysis demonstrates it is a fundamentally suboptimal arrangement, characterised by a profound imbalance between a single, dominant rural authority (Devon) and three geographically constrained urban unitary authorities (Plymouth,

Torbay, and Exeter). This structure perpetuates existing constraints on growth and creates an imbalanced partnership for devolution purposes.

### Financial Analysis

11.36. Devon's financial position reflects economies of scale offset by rural service delivery costs. The tax base of 277,975 Band D equivalent properties serving 690,000 people provides substantial financial resources. However, these must be spread across 16,894 kilometres of roads and numerous dispersed communities. Moderate deprivation (IMD decile 6) creates predictable service demands, but geographic dispersion significantly increases unit costs, particularly for adult social care serving an ageing population (27.6% over 65) across the vast rural area.

#### **Critical Assessment**

11.37. This option represents the current structure, serving as a legally compliant baseline. The authority operates at sufficient scale for financial resilience, but vast geography and dispersed population create service delivery challenges that offset some benefits of scale.

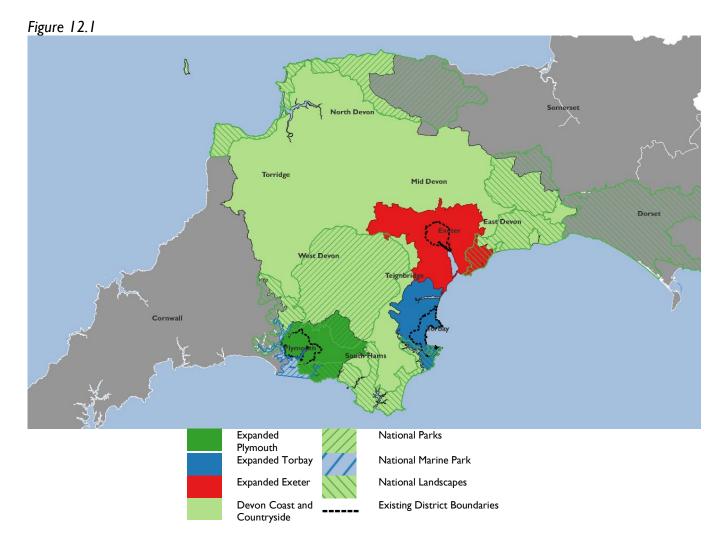
# Option One: Assessment Against Criteria

Table III

Table 11.1			
Government Criteria	Assessment	Rationale	
I. Single tier of local government	Met	<ul> <li>Creates 4 unitary councils using the existing principal authorities as building blocks.</li> <li>Meets the Government's invitation to set out a base case on whole districts.</li> <li>Removes the existing two-tier county and districts in currently in Devon.</li> </ul>	
2. Right size and financial resilience	Not Met	<ul> <li>Creates authorities of uneven population size and financial resilience.</li> <li>Risk pooling is unevenly spread across the region.</li> </ul>	
3. High-quality, sustainable services	Partially Met	<ul> <li>Maintains service continuity, but uneven population sizes may make collaboration more variable.</li> <li>Does not maximise opportunities for growth in especially in Plymouth and Exeter.</li> </ul>	
4. Local collaboration and responsiveness	Partially Met	<ul> <li>Provides for recognised and legally coherent administrative boundaries but does not respond to concerns and issues raised during the Plymouth's Big Conversation engagement or Exeter and Torbay's local government reorganisation engagements.</li> <li>This option is not supported by any of the Devon local authorities</li> </ul>	
5. Support for devolution	Partially Met	<ul> <li>Creates a group of constituent authorities across Devon to link into a South West Peninsula Mayoral Strategic Authority (to which Cornwall Council could be added).</li> <li>The absence of Ministerial modifications for Plymouth, Exeter and Torbay would place significant pressure upon any future Mayoral Strategic Authority who will be responsible for bringing forward the Spatial Development Strategy and growth options.</li> <li>Potential perceived imbalance at the Mayoral Strategic Authority due to variations in unitary council size.</li> </ul>	
6. Community engagement	Met	<ul> <li>Maintains a foundation of existing governance and neighbourhood engagement arrangements in each of the unitary authorities.</li> </ul>	
Our Principles for Local Government in Devon			

I. Financial viability and population	Not Met	<ul> <li>Whilst as continuing authorities Plymouth and Torbay are viable unitary councils, their current populations are insufficient to generate the financial base required for long-term viability and resist financial shocks.</li> <li>Exeter is not viable as a unitary council on its existing boundary.</li> <li>The new Devon Coast and Countryside unitary council would be of a sufficient size to be financially viable, but disproportionately large compared with the three other unitary councils in this option.</li> </ul>
2. Character and identity	Met	<ul> <li>The Base Case preserves the distinct, compact urban character of Plymouth, Exeter and Torbay, which is reflected in high population densities.</li> </ul>
3. Respect for boundaries	Met	<ul> <li>This option respects the boundaries of the existing unitary authorities of Plymouth and Torbay.</li> </ul>
4. National Parks/National Landscapes	Met	<ul> <li>The existing boundaries of Plymouth, Exeter and Torbay do not impinge National Parks or create governance complexities for the Park Authority.</li> </ul>
5. Parish boundaries	Met	<ul> <li>This option proposes no changes and therefore does not alter any existing parish boundaries.</li> </ul>
6. Sustainable growth and strategic role	Not Met	<ul> <li>The geographic constraint of 79.9 square kilometres prevents strategic growth opportunities, inhibiting Plymouth's capacity to fulfil its strategic regional and national role.</li> <li>Similarly in Exeter, at just 47.0 square kilometres, there are already severe spatial limitations on its strategic hub role. At 62.9 square kilometres, Torbay's future capacity to grow is significantly constrained.</li> </ul>

# **Option Two: Four Unitaries (Modified Case)**



## 12. Summary Assessment

- 12.1. This is the preferred option as it meets all Government criteria and Plymouth's principles. It establishes four balanced and financially resilient authorities with populations ranging from approx. 220,000 to 450,000. The structure respects community identities, creates a clear distinction between urban and rural areas, and enables strategic capacity for growth and devolution.
- 12.2. The configuration succeeds because each new authority is strengthened:
  - Plymouth gains strategic capacity with a population of 300,000 while maintaining its urban character.
  - An expanded Torbay solidifies financial sustainability through a 67% increase in its tax base.
  - An expanded Exeter can accommodate city-region growth with a balanced urban and suburban character.
  - Devon Coast and Countryside remains a viable authority scaled appropriately for effective rural service delivery.

# Option Two: Expanded Plymouth

Figure 12.2



### **Key Statistics**

- 12.3. Under this option, the Plymouth authority would have a population of approx. 300,000 across an expanded area of 358.7 km<sup>2</sup>, resulting in a new population density of approx. 830 people per square kilometre. Its responsibilities would cover a council tax base of 90,449 Band D equivalent properties and a road network of 1,800 km.
- 12.4. Compared to the Base Case, this represents a significant change in scale:
  - Population An increase of approx. 30,000 (+12.4%)
  - **Area** An increase of 278.8 km<sup>2</sup> (+349%)
  - Tax Base An increase of 13,891 Band D equivalent properties (+18.15%)
  - Population Density A decrease from 3,311 to 830 people/km<sup>2</sup>

### **Demographic Profile**

Children (0-15 years)	17.3%
Working age (16-64 years)	63.5%
Older people (65+ years)	19.2%
Home ownership rate	59.5%
Social rented	17.3%
Private rented	21.8%

12.5. Under this option, Plymouth maintains its young demographic profile. The proportion of children remains stable at 17.3%, and the working-age population is strong at 63.5%.

12.6. Although the older population (19.2%) and home ownership (59.5%) increase slightly due to the new extension areas, these figures remain well below those of neighbouring authorities. The key outcome is that this expansion adds valuable capacity without changing Plymouth's core character as a young, working-age city.

### **Indices of Deprivation 2025**

12.7. Expanded Plymouth has a population-weighted IMD rank of 16,000 (45.9% most deprived). The absorption of less deprived areas improves the rank by 933 places (from 15,067) and provides enhanced financial capacity through an 18% increase in the tax base. This configuration would rank approximately 98th out of 153 upper-tier authorities nationally, moving towards the less deprived end of the spectrum compared to Plymouth's current 68th position.

Category	Ward Name	National Rank
Most Deprived	St Peter and the Waterfront	88
•	Devonport	575
	St Budeaux	706
Least Deprived	Plymstock Dunstone	32,078
•	, Plymstock Radford	32,068
	Woolwell	31,970
Domain	Worst Ward/Area	National Rank
Employment Deprivation	St Peter and the Waterfront	83
Health Deprivation	Devonport	193
Crime	St Peter and the Waterfront	455
Barriers to Housing & Services	Ermington & Ugborough (S Hams)	632
Living Environment	Bickleigh & Cornwood (S Hams)	403

12.8. The expansion aligns governance with the city-region's economic and social geography. The Weighted IMD Rank improves to 16,000 (45.9% most deprived), representing a gain of 933 places through the absorption of less deprived areas. The most deprived ward remains St Peter and the Waterfront at rank 88, which confirms the expansion increases capacity without diluting focus on the city's most urgent needs. The new boundary integrates planning across the functional economic area, allowing the authority to address acute urban challenges alongside specific rural access issues. Areas like Ermington & Ugborough face Barriers to Housing at rank 632, requiring targeted intervention that benefits from being governed alongside urban employment centres rather than separately.

### **Service Implications**

12.9. A population increase from 270,000 to 300,000 expands the authority's service base while maintaining its core deprivation profile (IMD decile 4, IDACI decile 5). This larger population also strengthens the workforce, improving capacity to deliver specialist services tailored to the area's needs.

- 12.10. Although the proportion of residents aged 65 and over increases slightly (from 18.5% to 19.2%), the authority's larger scale is a key advantage. It enables better commissioning of services and more effective planning for specialist provision across the entire area.
- 12.11. Health deprivation of decile 3 indicates a clear need for focused intervention. The expanded authority is better positioned to address this by supporting integrated health improvement programmes and coordinating with NHS partners for the combined population.
- 12.12. More broadly, the larger population base enables more effective strategic planning. This supports a coordinated approach to the functional housing market, employment, skills development, and infrastructure across the combined geography.

### Financial Analysis

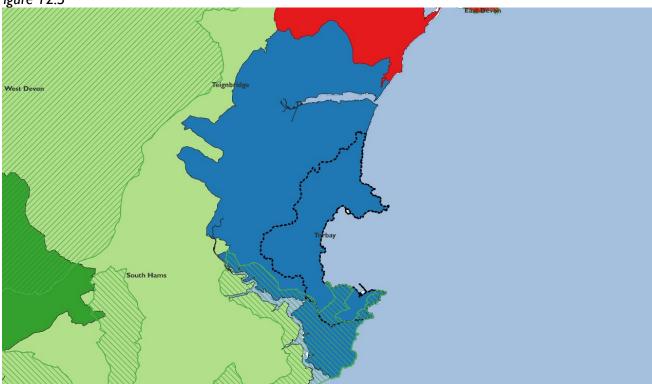
12.13. The expansion further improves Plymouth's financial sustainability. The increase in tax base to provides enhanced revenue capacity whilst spreading fixed costs across a larger population. One-off transition investment of £4.9 million generates over £6 million in annual benefits, representing excellent value for money. Enhanced financial resilience enables the authority to withstand demographic shocks, invest in preventative services, and fund strategic infrastructure necessary to accommodate defence sector growth and housing delivery.

#### **Critical Assessment**

12.14. This option addresses Plymouth's fundamental constraint by providing geographic space and financial capacity necessary for sustainable long-term service delivery. The expansion into the Plymouth Growth Area aligns with functional economic relationships and creates a coherent authority capable of fulfilling its role as the region's principal city.

# Option Two: Expanded Torbay





### **Key Statistics**

- 12.15. The proposed expanded Torbay authority would have a population of approx. 220,000 across an area of 263.2 square kilometres, resulting in a new population density of approx. 835 people per square kilometre. This new authority would be responsible for a council tax base of 82,356, Band D equivalent properties and a 1,526-kilometre road network.
- 12.16. Compared to the Base Case, this new option represents a significant expansion in scale and resources for Torbay. The population increases by 80,329 (a 57.7% growth), while the tax base grows by 133,101 Band D equivalent properties (a 67.2% increase). The authority's land area expands by 200.3 square kilometres (318%), which reduces the overall population density by 62%.

### **Demographic Profile**

Children (0-15 years)	16.0%
Working age (16-64 years)	57.5%
Older people (65+ years)	26.5%
Home ownership rate	66.8%

- 12.17. The expanded Torbay proposal maintains the area's essential coastal character. The age profile remains very similar to the Base Case, with only slight improvements in home ownership and professional employment that reflect the inclusion of the extension areas.
- 12.18. While the older population remains substantial at 26.5%, creating significant demand for adult social care, the 62% increase in the tax base provides the enhanced financial capacity required to meet these challenges effectively.

### **Indices of Deprivation 2025**

12.19. Expanded Torbay has a population-weighted IMD rank of 15,024 (43.1% most deprived). The absorption of less deprived areas improves the rank by 2,540 places (from 12,484), which provides enhanced financial capacity through a 62% increase in the tax base. This configuration would rank approximately 106th out of 153 upper-tier authorities nationally, moving from the most deprived third (current 39th position) to the mid-range alongside authorities like Bournemouth and Essex.

Category	Ward Name	National Rank
Most Deprived	Roundham with Hyde Tormohun	<b>404</b> 672
	Tormohun	811
Least Deprived	Buckland & Milber Ambrook Cockington with Chelston	30,691 30,513 29,902
Domain	Worst Ward/Area	National Rank
Crime Employment Deprivation Health Deprivation Barriers to Housing & Services	Tormohun Roundham with Hyde Roundham with Hyde Ashburton & Buckfastleigh (Teign)	127 255 330 1,126
Living Environment	Dartmouth & East Dart (S Hams)	325

12.20. Expanded Torbay addresses a fundamental capacity crisis. The Weighted IMD Rank improves dramatically by 2,540 places to 15,024 (43.1% most deprived), reflecting the absorption of less deprived areas. Core areas of concentrated need remain clear priorities: Roundham with Hyde at rank 404 and Tormohun containing the LSOA with England's 127th worst Crime Deprivation. However, these challenges are now supported by a sustainably enhanced resource base through a 62% increase in the tax base. Including wealthier adjacent areas like Buckland & Milber from Teignbridge allows the authority to manage its dual challenge of coastal deprivation and an ageing population (26.5% over 65) without requiring unsustainable efficiency gains or service reductions.

### **Service Implications**

12.21. The expanded authority maintains and enhances Torbay's proven service delivery model. The larger scale provides resources to sustain innovative approaches to integrated care

and children's services whilst building resilience against demographic pressures of an ageing coastal community.

## Financial Analysis

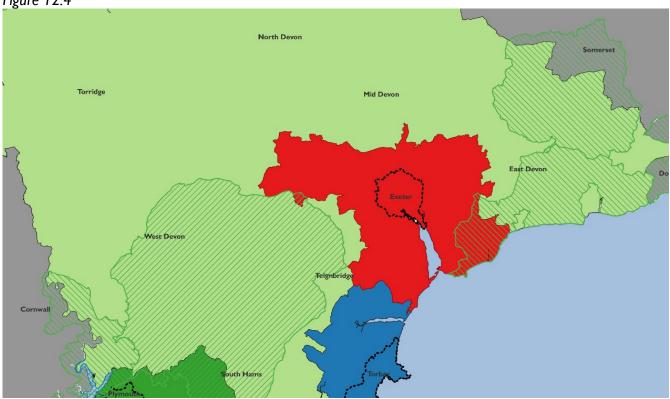
12.22. The 62% increase in tax base transforms Torbay's financial sustainability. Enhanced revenue capacity enables sustained investment in preventative services and integrated care partnerships without requiring unsustainable efficiency gains. The authority gains financial resilience necessary to manage demographic challenges of an ageing population whilst maintaining service quality.

### **Critical Assessment**

12.23. This option provides Torbay with the financial capacity and geographic scope necessary to sustain its proven service delivery model long-term. The expansion addresses the fundamental mismatch between service demands and available resources in the Base Case.

# Option Two: Expanded Exeter

Figure 12.4



### **Key Statistics**

- 12.24. The proposed Expanded Exeter authority would have a population of approx. 260,000 across a significantly larger area of 605.6 square kilometres, resulting in a new, much lower population density of approx. 411 people per square kilometre. The authority would be responsible for a council tax base of 88,439 Band D equivalent properties and a road network of 2,351 kilometres.
- 12.25. Compared to the Base Case, this represents a transformation in scale for Exeter. The population grows by approx. 90%, while the council tax base more than doubles. The most dramatic change is the geographic expansion of 1,188%, which adds 558.6 square kilometres to the authority's area.

### **Demographic Profile**

Metric	Value
Children (0-15 years)	15.7%
Working age (16-64 years)	63.0%
Older people (65+ years)	21.4%
Home ownership rate	63.8%
Professional and Managerial occupations	33.8%

- 12.26. The expanded Exeter model creates a balanced city-region authority by blending the young university city core with its surrounding suburban and rural areas.
- 12.27. This expansion broadens the demographic profile to include more families and older residents, all while maintaining the city's strong professional employment base. A key result of incorporating these surrounding communities is a substantial increase in the home ownership rate, which rises from 57.2% to 63.8%.

### **Indices of Deprivation 2025**

12.28. Expanded Exeter has a population-weighted IMD rank of 19,609 (56.3% most deprived), showing modest improvement from the base case (19,949). As a new unitary authority, this configuration would rank approximately 58th out of 153 upper-tier authorities nationally, positioning it in the less deprived third.

Category	Ward Name	National Rank
Most Deprived	Priory	4,236
•	St David's	4,425
	Priory	5,114
Least Deprived	Pennsylvania	33,044
·	Duryard and St James	31,782
	Pennsylvania	31,569
Domain	Worst Ward/Area	National Rank
Barriers to Housing & Services	Mid Devon 009D	4
Health Deprivation	St David's	287
Education, Skills & Training	Priory	458
Crime	St David's	755
<b>Employment Deprivation</b>	Priory	3,579

12.29. The expansion provides geographic and planning capacity necessary for Exeter to fulfil its regional role. The authority gains responsibility for areas with severe rural challenges, notably one LSOA ranking 4th in England for Barriers to Housing and Services (Mid Devon 009D). The Weighted IMD Rank of 19,609 (56.3% most deprived) shows moderate improvement, but the real benefit is strategic. The integrated structure enables coherent governance over the city's functional economic area, allowing targeted infrastructure development to address both acute urban challenges like Health Deprivation in St David's ward (rank 287) and distinct service access issues in rural communities now under its mandate.

### **Service Implications**

12.30. The expanded authority gains capacity to deliver specialist services at appropriate scale. Strategic planning capacity for housing growth, employment sites, and transport infrastructure aligns with city-region needs.

### Financial Analysis

12.31. The transformation is dramatic. Tax base more than doubles, providing financial resources commensurate with Exeter's regional role. The increase in geographic area

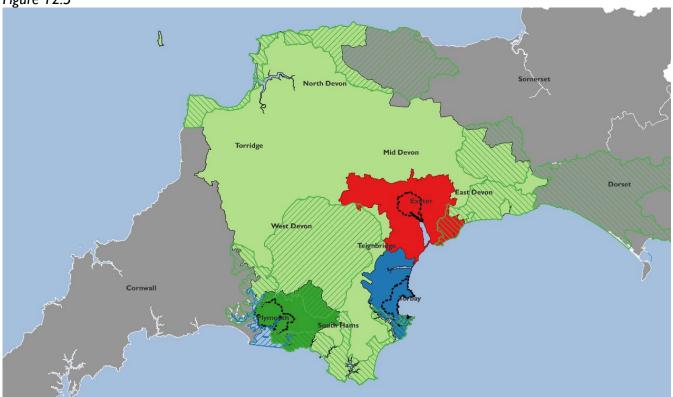
provides access to growth areas and commuter zones that expand the tax base. This creates capacity for strategic infrastructure investment, coherent transport planning, and effective housing delivery.

### **Critical Assessment**

12.32. This option addresses Exeter's most severe spatial constraint. The expansion provides planning capacity to accommodate city-region growth whilst maintaining the knowledge-economy character. The expanded authority gains resources and space to fulfil its regional role without compromising service quality or democratic accountability.

# Option Two: Devon Coast and Countryside

Figure 12.5



### **Key Statistics**

- 12.33. The proposed 'Devon Coast and Countryside' authority would have a population of approx. 450,000 distributed across an area of 5,486.0 square kilometres. This option results in a very low population density of approx. 82 people per square kilometre. The new authority would be responsible for a council tax base of 182,395 Band D equivalent properties.
- 12.34. This new entity is formed from the Base Case Devon by transferring its urban/suburban areas to other authorities. As a result, its population decreases by 231,414 (a 34.0% reduction) and its tax base is reduced by 95,580 Band D equivalent properties (a 34.3% reduction). While the land area also decreases, the reduction is smaller at 15.9%, making the new authority more consistently rural with its lower population density.

### **Demographic Profile**

Children (0-15 years)	15.8%
Working age (16-64 years)	56.0%
Older people (65+ years)	28.3%
Home ownership rate	69.5%

12.35. The removal of urban areas from the Base Case creates the 'Devon Coast and Countryside' authority, which is a more consistently rural entity.

12.36. The authority now has the oldest population, with 28.3% of residents aged over 65, and the highest rate of home ownership at 69.5%.

### **Indices of Deprivation 2025**

12.37. Devon Coast and Countryside has a population-weighted IMD rank of 16,274 (46.7% most deprived), showing increased deprivation compared to current Devon County Council (17,542, 50.3%). This worsening reflects the deliberate transfer of less deprived suburban areas to urban unitaries, leaving a more consistently rural authority with concentrated challenges. This configuration would rank approximately 96th out of 153 upper-tier authorities nationally, compared to Devon's current 101st position.

Category	Ward Name	National Rank
Most Deprived	Barnstaple Central	1,570
-	Ilfracombe East	1,868
	Barnstaple with Westacott	2,387
Least Deprived	Tavistock South East	31,956
•	Honiton St Michael's	31,352
	Sidmouth Town	29,670
Domain	Worst Ward/Area	National Rank
Barriers to Housing & Services	Monkleigh & Putford (Torridge 008E)	1
Living Environment	Ashburton & Buckfastleigh (Teignbridge 003C)	220
Health Deprivation	Barnstaple Central	572
Employment Deprivation	Barnstaple Central	1,717
Crime	Barnstaple Central	1,532

12.38. This configuration creates a deliberately focused rural authority. The Weighted IMD Rank of 16,274 (46.7% most deprived) reflects the transfer of more affluent suburban areas to the urban unitaries, which allows the authority to concentrate entirely on rural service challenges. The core mission centres on managing extreme rural isolation, retaining governance over the Monkleigh & Putford LSOA (rank I for Barriers) whilst addressing coastal deprivation in areas like Barnstaple Central. This focused model targets resources at developing cost-effective solutions for dispersed populations and older demographics (28.3% over 65) without competing urban priorities diluting attention or investment.

## Service Implications

12.39. The focused rural authority can concentrate entirely on distinct challenges of dispersed service delivery, rural poverty, connectivity, and ageing demographics without managing dense urban cores with fundamentally different needs.

### Financial Analysis

12.40. The 34% reduction in population and tax base creates a more coherent rural authority. Whilst resources decrease, the authority maintains appropriate scale for financial resilience and specialist services. The more consistently rural character enables focused investment in rural service delivery models without competing urban priorities.

### **Critical Assessment**

12.41. This option achieves appropriate scale for rural governance: large enough for financial resilience and specialist services, but coherent enough for genuine local accountability and tailored service models.

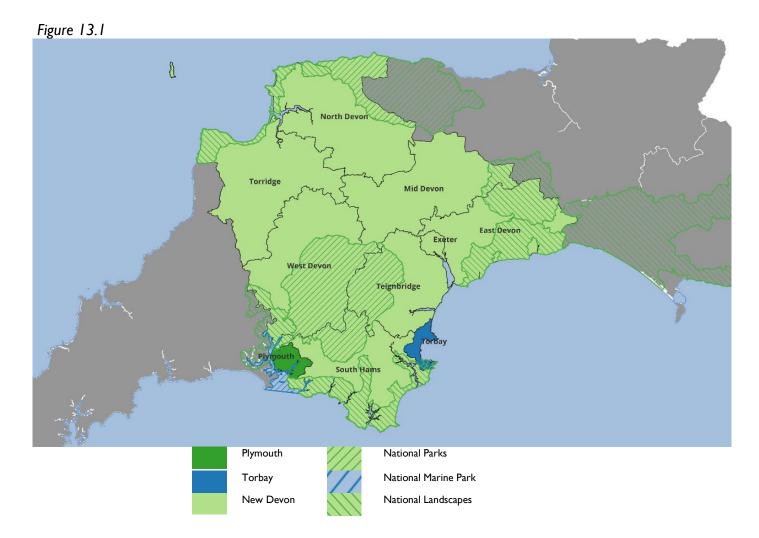
# Option Two: Assessment Against Criteria

Table 12.1

Government Criteria		
Single tier of local government	Met	<ul> <li>Creates four unitary councils in Devon, removing the existing two-tier arrangements in the expanded area.</li> </ul>
2. Right size and financial resilience	Met	<ul> <li>Creates four unitary authorities with broadly comparable populations with sustainable tax bases of sufficient size to resist financial shocks.</li> <li>Creates a nationally significant, growth-orientated unitary council for Plymouth with a population of over 300,000.</li> <li>Creates expanded unitary authorities for Exeter and Torbay able to realise regionally significant growth potential.</li> </ul>
3. High-quality, sustainable services	Met	<ul> <li>Creates a coherent service geography for school admissions, transport, skills, and social care.</li> <li>Maximises opportunities for growth and simplifies residents' access to services.</li> </ul>
4. Local collaboration and responsiveness	Met	<ul> <li>A four unitary model is supported by two existing unitary authorities and Exeter City Council.</li> <li>Provides for recognised and legally coherent administrative boundaries which reflect settlement patterns and functional economic relationships</li> <li>The proposed expansion areas are based on the building blocks of Parish and Town Councils with settlements that are functionally linked to the principal urban areas.</li> </ul>
5. Support for devolution	Met	<ul> <li>Creates a group of balanced constituent authorities to link into a South West Peninsula Mayoral Strategic Authority, allowing retained expertise to support a regional strategy.</li> </ul>
6. Community engagement	Met	<ul> <li>New neighbourhood governance arrangements to be developed.</li> </ul>

		<ul> <li>Protects existing parish and town council arrangements.</li> </ul>
Our Principles for Lo	cal Governm	
I. Financial viability and population	Met	<ul> <li>Financial modelling demonstrates that a four unitary model is viable.</li> <li>The 12.4% increase in population and the 16.3% increase in the council tax base provide the necessary scale and financial capacity for long-term viability for Plymouth.</li> </ul>
2. Character and identity	Met	<ul> <li>The four unitary model maintains the character and identity of the expanded urban authorities by being based on functionally linked settlements within parish areas.</li> <li>In the case of the expanded Plymouth unitary authority, despite a 349% increase in land area the proposal sets out how we will preserve the character of all communities in the area.</li> <li>In the case of the Devon Coast and Countryside unitary authority, 20 of the 28 larger towns which are the focus of growth and service provisions are retained from the former county area.</li> </ul>
3. Respect for boundaries	Met	<ul> <li>The proposed boundary extensions are logical and evidence-based, reflecting the functional geography of the Plymouth, Exeter and Torbay housing market areas, and travel-to-work patterns.</li> </ul>
4. National Parks/National Landscapes	Met	<ul> <li>The proposed new boundaries have been designed to be minimise impact on National Park Authorities.</li> </ul>
5. Parish boundaries	Met	<ul> <li>The principle of using whole, undivided parishes as the building blocks for the extension is a cornerstone of this option to reflect the importance of character and identity.</li> </ul>
6. Sustainable growth and strategic role	Met	<ul> <li>The expansion of the urban areas provides the "planning capacity for sustainable growth" that is critically absent in the Base Case, unlocking the growth potential of the three urban areas.</li> </ul>

# **Option Three: Three Unitaries (New Devon)**



### **Summary Assessment**

- 13.1. This option creates three unitary authorities of significantly different scales, which presents challenges for balanced regional governance and strategic coordination. Whilst each authority can deliver core services within their existing boundaries, the arrangement does not optimise the opportunities for strategic growth, partnership working, or balanced devolution. The arrangement faces challenges in supporting:
  - Strategic growth planning across functional economic areas.
  - Balanced partnership working between authorities of different scales.
  - Effective coordination of regional priorities.
- 13.2. The population distribution shows substantial variation. Devon (811,000) would be considerably larger than both Torbay (140,000) and Plymouth (270,000), which creates complexity in establishing balanced partnership arrangements and devolution structures that give each authority appropriate influence in strategic decision-making.
- 13.4. Torbay would be below 200,000 population, though many authorities across England successfully deliver services at this scale. Plymouth's existing boundaries limit opportunities for strategic planning across its wider economic area. Devon would become one of the larger

unitary authorities in England, creating some challenges around maintaining local connection across its extensive geography. This option maintains administrative clarity through established boundaries but does not fully create the foundation for optimised strategic growth or balanced regional partnership.

# Option Three: Plymouth

Figure 13.2



The impact on Plymouth is as expressed in the base case.

# Option Three: Torbay

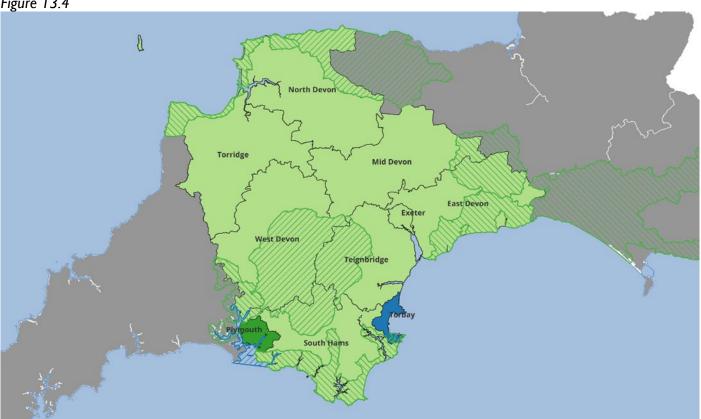
Figure 13.3



The impact on Torbay is as expressed in the base case.

# Option Three: Devon County Council Area

Figure 13.4



# **Key Statistics**

Devon would be a large rural authority encompassing approximately 811,000 people across 6,569 km<sup>2</sup>, creating a population density of 124 people per square kilometre. The council would manage an extensive 24,556 km road network serving numerous towns, villages, and dispersed rural communities across Devon's varied landscape.

# **Demographic Profile**

Children (0-15 years)	15.8%
Working age (16-64 years)	58.4%
Older people (65+ years)	25.8%
Home ownership rate	68.2%
Social rented	11.5%
Private rented	19.0%

13.7. New Devon has a settled rural population with over a quarter of residents aged 65 or over. The working-age population supports both resident population and diverse rural economy spanning agriculture, tourism, market towns, and coastal communities. At 124 people per square kilometre, the population is much more dispersed than urban authorities. Communities range from substantial market towns to small villages and isolated farms.

### **Indices of Deprivation 2025**

13.8. New Devon has a population-weighted IMD rank of 17,935 (51.5% most deprived), a moderate overall position that results from combining incompatible urban and rural geographies.

Category	Ward Name	National Rank
Most Deprived	Barnstaple Central Ilfracombe East	<b>1,570</b> 1,868
Least Deprived	Pennsylvania	33,044
Domain	Worst Ward/Area	National Rank
Domain  Barriers to Housing & Services	Worst Ward/Area  Monkleigh & Putford (Torridge 008E)	National Rank

- 13.9. This configuration combines incompatible geographies within a single authority. With a Weighted IMD Rank of 17,935 (51.5% most deprived), the authority must simultaneously address urgent Health challenges in Exeter's urban core, such as St David's ward at rank 287, alongside extreme rural isolation where Monkleigh & Putford ranks 1st nationally for Barriers to Housing and Services.
- 13.10. The structure fails because urban coastal deprivation and rural isolation require fundamentally different service models, yet this arrangement forces a single approach across an authority of 811,000 people. The result is ineffective resource deployment and a democratic deficit where Exeter (Devon's fastest-growing city) becomes a minority voice within a vast rural authority.

# **Service Implications**

13.11. The primary challenge is managing fundamentally different service models within one authority. Exeter requires dense urban service delivery for a young, knowledge-economy population, whilst rural areas require dispersed delivery models for an ageing population across vast geography. The scale at 811,658 population may compromise local connection and democratic accountability.

#### Financial Analysis

13.12. New Devon would be financially sustainable at this scale, with good capacity for strategic investment and service development. However, the key consideration is ensuring that extensive geography and dispersed population do not create inefficiencies that offset benefits of scale, and that partnership arrangements with Plymouth and Torbay enable balanced regional governance.

#### **Critical Assessment**

13.13. This option creates a fundamental democratic deficit by submerging Exeter (Devon's fastest-growing city) within a vast authority where the City becomes a minority voice. Exeter's distinct

growth challenges and urban service needs become subordinated to rural priorities, hindering the city's development and regional role.

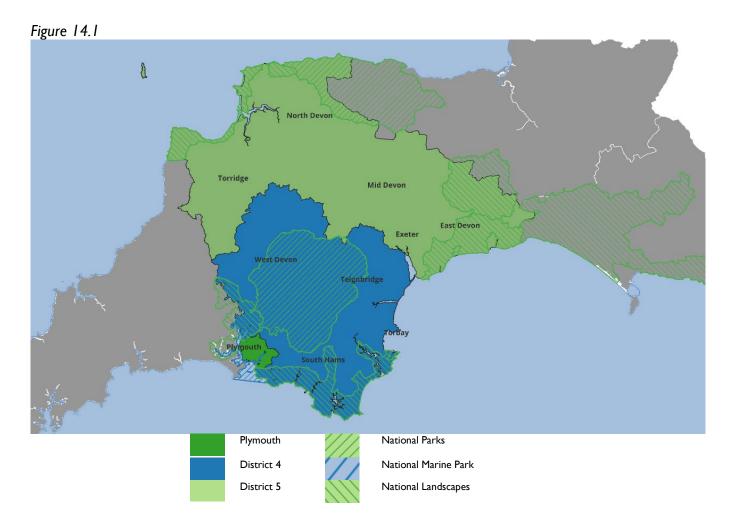
# Option Three: Assessment Against Criteria

Table 13 I

Table 13.1		
Criterion	Assessment	Rationale
I. Single tier of local government	Partially Met	<ul> <li>Creates three legally recognised unitary authorities, removing the two-tier structure.</li> <li>However, extreme size variation (6:1 ratio) undermines equality between authorities and creates an unbalanced foundation for partnership working.</li> </ul>
2. Right size and financial resilience	Not Met	<ul> <li>Plymouth, at 270,000, lacks strategic growth capacity.</li> <li>New Devon, at 811,658, may be too large for effective local democracy and could exhibit dis-economies of scale.</li> <li>Torbay, at 139,000, may be vulnerable to future financial shocks.</li> </ul>
3. High-quality, sustainable services	Partially Met	<ul> <li>Torbay potentially lacks long-term resilience at its existing scale to develop future sustainable service delivery.</li> <li>Plymouth is severely constrained from future strategic development.</li> <li>The extreme size variations make collaboration and standardisation of service delivery very difficult.</li> </ul>
4. Local collaboration and responsiveness	Not Met	<ul> <li>This option is supported by only one local authority.</li> <li>Devon's dominance risks marginalising Plymouth and Torbay in partnership working.</li> <li>The Integrated Care System, Police, Fire Service and devolution arrangements all face challenges from size imbalances.</li> </ul>
5. Support for devolution	Not Met	<ul> <li>Creates unequal partners for devolution, with Devon dominating at 66.8% of population.</li> <li>Plymouth cannot represent its functional economic area.</li> <li>Provides an extremely difficult foundation for a balanced Mayoral Strategic Authority.</li> </ul>
6. Community engagement	Partially Met	<ul> <li>Uses established principal authority boundaries with clear democratic legitimacy.</li> <li>New Devon's scale (with a population of 811,000) risks weakening local democratic connections.</li> </ul>

		Residents in large rural wards may feel distant
		from decision-making.
Our Principles for Loc	al Government	t in Devon
I. Financial viability and population	Not Met	<ul> <li>All three principal urban centres cannot grow tax base or capture development value.</li> <li>The unitary authority of Plymouth remains at a constrained 270,000 population, and benefits from the Freeport accrue to New Devon rather than to Plymouth.</li> <li>The unitary authority of Torbay remains constrained at 139,000 population.</li> <li>Exeter does not achieve unitary status and remains constrained at 135,000 population.</li> <li>Long-term financial sustainability of the three urban centres (including the existing unitaries of Plymouth and Torbay) fundamentally undermined.</li> </ul>
2. Character and identity	Not Met	<ul> <li>Plymouth cannot maintain its identity as a strategic regional centre when locked at current boundaries. The city's functional economic area extends well beyond 79.9 km², and this option prevents recognition of those natural relationships.</li> <li>Exeter is subsumed within a huge rural authority and its potential for growth undermined.</li> <li>Torbay cannot maintain its identity and potential for growth.</li> </ul>
3. Respect for boundaries	Partially Met	<ul> <li>Respects existing principal authority boundaries, but these boundaries are precisely the problem. They do not reflect functional economic areas or how people live, work and travel.</li> </ul>
4. National Parks/National Landscapes	Met	<ul> <li>No major implications on the Dartmoor National Park Authority from this option.</li> </ul>
-	Met	<ul> <li>No changes to parish boundaries as no boundary extensions proposed.</li> </ul>
6. Sustainable growth and strategic role	Not Met	<ul> <li>Opportunities would be lost for Plymouth, Exeter and Torbay to plan strategically for significant levels of growth to reflect their housing market areas and functional economic areas.</li> <li>Effective delivery of the Plymouth Freeport and sub-regional infrastructure, such as the Plymouth Metro proposals, would be more challenging. Fundamentally fails to enable Plymouth's growth and regional role.</li> </ul>

# **Option Four: Three Unitaries (District Grouping)**



# **Summary Assessment**

14.1. This option presents significant governance challenges as it fails to meet Government criteria and Plymouth's principles. It creates unitary authorities based solely on old administrative boundaries, failing to reflect current functional economic relationships. The result is an imbalanced structure that favours rural areas, undermines Plymouth's ability to fulfil its role as the region's principal city, and leaves it as the smallest and most constrained authority.

# Option Four: Plymouth

Figure 14.2



The impact on Plymouth is as expressed in the base case.

# Option Four: Four District Unitary

Figure 14.3



# **Key Statistics**

14.2. The proposed Four District Unitary would have a population of 420,000 across a vast area of 2,785.3 square kilometres, resulting in a low population density of approx. 151 people per square kilometre. The authority would be responsible for a council tax base of 167,275 Band D equivalent properties and an extensive 7,569-kilometre road network.

# **Demographic Profile**

Children (0-15 years)	15.7%
Working age (16-64 years)	56.9%
Older people (65+ years)	27.4%
Home ownership rate	68.6%

#### **Indices of Deprivation 2025**

14.3. The Four District Unitary has a population-weighted IMD rank of 16,389 (47.0% most deprived), combining concentrated urban deprivation with affluent rural hinterlands. The overall Weighted IMD Rank of 16,389 (47.0% most deprived) obscures significant internal variation.

**National Rank Category** Ward Name

**Most Deprived** 

Roundham with Hyde

404

	Tormohun	672
Least Deprived	Woolwell	31,970
Domain	Worst Ward/Area	National Rank
:	:	:
Crime	Tormohun	127
Employment Deprivation	Roundham with Hyde	255
Health Deprivation	Roundham with Hyde	330

14.4. This configuration lacks geographic coherence, combining Torbay's concentrated urban deprivation with large affluent rural hinterlands. The resulting Weighted IMD Rank of 16,389 (47.0% most deprived) misleads by averaging extremes. Wards like Tormohun, containing England's 127th worst Crime Deprivation LSOA, sit alongside some of Devon's wealthiest rural areas. This structure prevents effective prioritisation. Resources and attention become spread across fundamentally different needs without an obvious service centre or preexisting administrative logic to guide delivery.

# **Service Implications**

14.5. The proposed district is exceptionally large and predominantly rural. It covers an area 35 times greater than Plymouth but with very low population density of 151 people per square kilometre. This vast, sparsely populated area combines many distinct communities without an obvious single service centre or pre-existing administrative structure, posing significant challenges for cohesive governance and effective service delivery.

# Financial Analysis

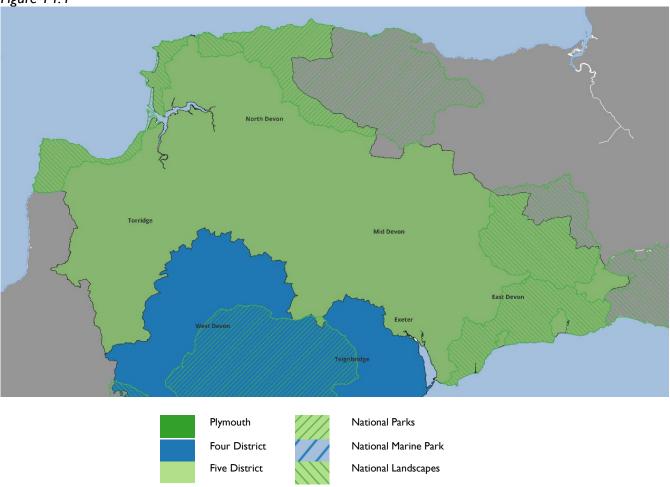
14.6. A key concern is the significant imbalance this creates with Plymouth. The district has a population 58% larger than Plymouth and a council tax base 117% greater. However, its population has lower levels of deprivation, indicating comparatively lower need for intensive public services. This arrangement concentrates greater financial resources in a less deprived district whilst leaving Plymouth with higher concentration of service demand and more constrained budget.

### **Critical Assessment**

14.7. This option creates an authority that lacks coherence, combining Torbay's dense coastal urban character with vast rural hinterlands without a unified service delivery logic or established administrative structure.

# Option Four: Five District Unitary

Figure 14.4



# **Key Statistics**

14.8. The Five District Unitary covers an area of 3,846.8 square kilometres and has a population of approx. 530,000, resulting in a density of 138 people per square kilometre. Compared to Plymouth, the district is 48 times larger, yet its population density is 24 times lower than Plymouth's 3,311 people per square kilometre. The local authority maintains 10,483 kilometres of roads and has a council tax base of 199,805 Band D equivalent properties, which is 160% larger than Plymouth's.

# **Demographic Profile**

Children (0-15 years)	15.9%
Working age (16-64 years)	59.3%
Older people (65+ years)	24.8%
Home ownership rate	66.7%

#### **Indices of Deprivation 2025**

14.9. The Five District Unitary has a population-weighted IMD rank of 17,741 (50.9% most deprived), combining fundamentally incompatible urban and rural needs within a single authority.

Category	Ward Name	National Rank
Most Deprived	Barnstaple Central Ilfracombe East	<b>1,570</b> 1,868
Least Deprived	Pennsylvania	33,044
Domain	Worst Ward/Area	National Rank
Domain  Barriers to Housing & Services	Worst Ward/Area  Monkleigh & Putford (Torridge 008E)	National Rank
	Monkleigh & Putford	National Rank I 287

14.10. This arrangement forces governance of incompatible needs within a single authority. With a Weighted IMD Rank of 17,741 (50.9% most deprived), the configuration averages urban challenges in Exeter wards against extreme rural isolation in Monkleigh & Putford (rank I for Barriers). St David's ward faces Health Deprivation at rank 287 whilst northern rural areas struggle with access to basic services across vast distances. The structure fails to deliver appropriate service models for either geography, creating a fundamentally flawed arrangement that serves neither urban nor rural communities effectively.

#### **Service Implications**

14.11. Five District Unitary would have population density of 138 people per square kilometre, comparable to Devon's 104 in the Base Case. The primary concern is not density but lack of established service infrastructure and transition costs of creating new delivery models, unlike Devon which has decades of established rural service delivery systems.

# Financial Analysis

14.12. This option creates profound disparity between resources and service demands. The district possesses a council tax base 160% larger than Plymouth's, granting substantially greater financial capacity. However, its population has lower deprivation profile, indicating proportionally smaller need for intensive public services. This arrangement concentrates immense resources in a district with comparatively fewer needs, leaving Plymouth to manage greater concentration of service demand with severely constrained financial base.

# **Critical Assessment**

14.13. This option is presented as fundamentally flawed and inequitable, failing to meet core tests of good governance. It creates artificial groupings without functional economic rationale or established administrative structures, whilst perpetuating and exacerbating regional imbalances.

# Option Four: Assessment Against Criteria

Table 14.1

ble 14.1		
Government Criteria	Assessment	Rationale
Single tier of local government	Met	<ul> <li>The model adheres to the principle of creating single-tier authorities.</li> </ul>
2. Right size and financial resilience	Not Met	<ul> <li>Creates authorities of uneven population size and financial resilience.</li> <li>Risk pooling is unevenly spread across the region.</li> <li>In this option Plymouth remains at a non-resilient size, and this failure is magnified by the creation of hugely advantaged neighbours with tax bases 117% and 160% larger.</li> </ul>
3. High-quality, sustainable services	Not Met	<ul> <li>Allocates vastly superior resources to new unitary councils with more affluent areas.</li> <li>Population sixes make collaboration more variable.</li> <li>All service sustainability challenges of the Base Case remain for Plymouth, and therefore unresolved.</li> </ul>
4. Local collaboration and responsiveness	Not Met	<ul> <li>This option is supported by 7 of the 8 districts authorities in Devon.</li> <li>The unitary authority of Torbay is included within this option but do not support it.</li> <li>The proposed boundaries slice through existing urban extensions such as those surrounding Exeter and Plymouth, paying no regarding to the functional relationships between communities in proximity.</li> </ul>
5. Support for devolution	Not Met	<ul> <li>This option would create an even more imbalanced partnership for devolution.</li> <li>Plymouth would be a minor partner, dwarfed by the two new superdistricts, yet be responsible for the delivery of nationally significant growth</li> </ul>

		proposals such as the investment in HMNB Devonport.
6. Community engagement	Not Met	The creation of vast, artificial districts with "no established structures or relationships" would fundamentally undermine meaningful community identity across the wider region.
Our Principles for I	Local Governr	nent in Devon
I. Financial viability and population	Not Met	<ul> <li>This option fails for the same reasons as the Base Case, with the added inequity of Plymouth being left behind while surrounding areas are strengthened.</li> </ul>
2. Character and identity	Met	<ul> <li>Plymouth's own distinct urban character is preserved, but in a state of isolation.</li> </ul>
3. Respect for boundaries	Not Met	<ul> <li>The option creates arbitrary boundaries with an unclear rationale based only on former district council boundaries.</li> </ul>
4. National Parks/National Landscapes	Partially Met	<ul> <li>The creation of vast new super districts bordering the National Park would likely introduce new and complex governance relationships for the Dartmoor National Park Authority.</li> </ul>
5. Parish boundaries	Met	<ul> <li>As amalgamations of former district council areas parish boundaries would be protected.</li> </ul>
6. Sustainable growth and strategic role	Not Met	<ul> <li>This option would prevent Plymouth and Torbay driving forward significant complementary growth agendas by permanently restricting their areas for growth.</li> <li>Exeter would be combined into a wider largely rural area which does not reflect their travel to work area and is likely to result in a loss of focus for their growth agenda. Plymouth and Torbay would be surrounded by with larger, richer authorities.</li> </ul>

# **Rejected Options**

- Option 3 (I-4-5 Model) is not recommended due to significant disadvantages would create a severe regional imbalance by concentrating service needs in Plymouth while allocating a disproportionate level of resources elsewhere.
- The Base Case (Option I) is also not recommended. While proposing a district building block option which is legally compliant, it would hinder the city's long-term growth prospects by constraining its geographic and financial capacity, leading to a future of diminished regional influence.
- The New Devon option is not recommended. It creates a fundamental democratic deficit by submerging Exeter City within a vast authority where it has a minority voice. Exeter's distinct growth challenges and urban service needs become subordinated to rural priorities, hindering the city's development and regional role.

# **Recommended Preferred Option**

The modified four unitary model emerges as the most logical, evidence-based, and strategically sound path forward. It is the strongest option for providing Devon with a framework for a sustainable future, including sufficient land for growth, a resilient tax base to fund high-quality services, and a coherent urban identity.

This configuration would create a more balanced regional structure that respects community identities and enables the strategic development needed to position Devon and the wider region for future success.

# **Democracy and Community Empowerment**

- 15.1. The four-unitary model enables genuine democracy across Devon because each authority is sized to maintain meaningful connection with residents. Councillors can know their wards and communities. Residents understand which council is responsible. Each authority can develop engagement approaches tailored to its context, whether urban Plymouth and Exeter, compact Torbay, or dispersed rural Devon.
  - 15.2. The expanded authority represents more than administrative change. It offers the opportunity to fundamentally reshape the relationship between local government and the communities it serves, moving from traditional consultation models to genuine empowerment where residents have real influence over the decisions that affect their lives.
  - 15.3. Our recent, extensive public engagement has provided a clear mandate for this new approach. We have heard the heartfelt desire from residents, particularly in the South Hams parishes, to preserve their strong rural and local identities. We also acknowledge the significant concerns raised about being absorbed into a larger, urban-led authority. This proposal is our response, designed to build trust by embedding localism and co-design into the fabric of the new council.

### **Redefining the Role of Councillors**

- 15.4. This reorganisation provides a crucial opportunity to evolve the role of councillors, building on their existing strengths as community advocates. While the demands of casework are an essential part of their offer, this new model will empower and equip them to further develop their roles as proactive community leaders, facilitators, and conveners. This shift in emphasis from reactive service delivery to strategic community-building represents a significant development in our approach to 21st-century local democracy.
  - Leading Councillors will provide clear community leadership, bringing together diverse stakeholders around shared challenges and opportunities. They will have the authority and resources to respond decisively to local priorities whilst maintaining strong connections to strategic decision-making.
  - Facilitating Councillors will convene partnerships between residents, businesses, voluntary organisations, and public services. They will create spaces for dialogue and collaboration, helping communities identify their own solutions whilst ensuring access to necessary support and resources.
  - Advocating Councillors will serve as strong voices for public interests, ensuring
    community perspectives reach strategic partnerships and decision-making forums. They
    will champion local needs whilst contributing to place-based leadership across the
    authority.
- 15.5. This approach builds on Plymouth's existing strengths whilst extending democratic engagement across the enlarged authority. Councillors will maintain their essential casework function whilst developing enhanced capacity for community leadership and partnership building.

# **Building on Proven Excellence in Community Engagement**

- 15.6. Plymouth City Council already demonstrates exceptional practice in community engagement across multiple service areas. This foundation provides the platform for extending our empowerment approach across the enlarged authority.
  - Strategic Commissioning has pioneered co-production through the Plymouth All-Age Unpaid Carers Strategy, developing comprehensive co-production toolkits and training programmes.
  - **SEND Services** operates a structured, inclusive approach to co-production, ensuring young people's lived experience directly informs strategic decision-making.
  - Public Health employs Asset-Based Community Development principles through the city's Community Builders programme, training 90 professionals citywide in strength-based approaches.
  - The Plymouth Health Determinants Research Collaboration embeds research
    expertise within the council to support evidence-based service design grounded in realworld needs.
  - Youth Services has worked directly with unaccompanied asylum-seeking children to understand their experiences and co-create solutions, leading to service improvements praised by Ofsted.
  - **Natural Environment programmes** have transformed relationships with environmental groups through practical volunteering and co-designed delivery.
  - Net Zero Delivery engages communities through innovative approaches and facilitates
    Plymouth Climate Ambassadors with young people to ensure their voices shape the city's
    action plan.

#### **Enhanced Engagement Framework for the expanded Plymouth**

15.7. The expanded authority will implement a comprehensive Engagement and Consultation Framework that moves beyond traditional consultation to genuine empowerment. This framework recognises that engagement sits on a spectrum from informing and consulting to collaborating and empowering, with clear explanation of where each activity sits and why.

# **Core Principles**

- **Respect** means treating everyone with dignity and fairness, listening without judgement, and celebrating community diversity.
- **Transparency** involves being open about what we are doing, why we are doing it, and how decisions are made.
- **Inclusion** requires actively removing barriers to participation and reaching underrepresented voices.
- **Responsiveness** means listening carefully, acting meaningfully, and providing timely feedback.
- **Partnership** involves working collaboratively with residents, striving to co-design solutions and share power where possible.

#### **Democratic Arrangements for the expanded Plymouth Authority**

15.8. The democratic arrangements for the expanded Plymouth Authority will establish effective representation for both existing Plymouth residents and the 29,000 people in the 13 parishes joining from South Hams through a unified structure that respects local identity whilst enabling strategic coordination.

#### Respecting Heritage

- 15.9. Plymouth City Councillors have elected and chosen a Lord Mayor annually since receiving its Royal Charter in 1439. In 1935, King George V conferred the dignity of Lord Mayoralty upon the city by Letters Patent. This history of self-governance matters to our identity, and we would like to extend that principle of distinct representation to our new communities.
- 15.10. Effective and successful reorganisation must address matters of civic identity alongside administrative changes. The significance of place-based identity matters, as its neglect has led to difficulties in comparable reorganisations elsewhere. Accordingly, our proposal creates a model of ceremonial governance that formally recognises and coherently links the distinct civic roles across the new authority.

#### 15.11. This framework includes:

- The Lord Mayor of Plymouth as First Citizen The Lord Mayor, a role granted by Royal Letters Patent, will represent the entire expanded authority at city-wide and national events, providing continuity and a unifying figurehead.
- Formal Recognition of Town Mayors Existing statutory civic roles, such as the Town Mayor of lyybridge, will be formally recognised in the city's official civic protocol. Under the Local Government Act 1972, these roles have their own local mandate. They will be the civic head of their community, with precedence at events within their town, and will have a place of honour at city-wide civic functions.
- **Civic Agreements** Written agreements will establish how these separate civic roles work together and appear at each other's events. These will guarantee each community's right to hold its own ceremonies and commit the authority to respecting local traditions, documenting clearly that historic identities are valued and protected.

# **Council Size and Representation**

- 15.12. The challenge of democratic representation in local government reorganisation reflects the fundamental geography and settlement patterns of Devon. The proposed Rural Devon unitary authority, covering approximately 455,000 to 550,000 residents and an electorate of approximately 340,000 depending on configuration, would serve a vast and sparsely populated area. The Local Government Boundary Commission for England (LGBCE) recommends a maximum of 100 councillors for any unitary authority, and analysis suggests Rural Devon would require between 70 and 100 councillors depending on the representation ratio adopted.
- 15.13. At 90 councillors, this would result in a representation ratio of approximately 1:3,754 electors per councillor, closely aligned with Northumberland (1:3,755 electors per councillor). At 70 councillors, the ratio would be approximately 1:4,826 electors per councillor, approaching Cornwall Councils model (1:4,956 electors per councillor). These ratios reflect the practical realities of serving extensive rural geographies within the Commission's recommended parameters.

- 15.14. Our proposal, alongside the other proposed expanded urban authorities, offers a different democratic settlement that reflects urban / sub-urban geography. Each urban authority brings distinct characteristics that will inform their eventual council size, which should properly be determined through the Local Government Boundary Commission for England's electoral review process following reorganisation.
- 15.15. The expanded Plymouth authority, with a population of approximately 300,000 and an electorate of 222,213 (using 2024 LGBCE data), would likely require between 60 and 75 councillors, subject to the Local Government Boundary Commission's electoral review.
- 15.16. This range applies the LGBCE's three-criteria methodology (strategic leadership, accountability, and community leadership) and CIPFA benchmarking of comparable urban authorities. Plymouth's electoral review, paused by the Local Government Boundary Commission pending this reorganisation process, had agreed a council size of 60 councillors for the existing authority based on detailed analysis of CIPFA comparators. The expanded authority, incorporating additional communities, requires additional representation to maintain effective democratic accountability. At 60 councillors, the ratio would be approximately 1:3,704 electors per councillor; at 72 councillors, approximately 1:3,086; at 75 councillors, approximately 1:2,963. All ratios within this range provide effective representation across both the urban core and incorporated parishes. The exact number should be determined through proper electoral review.
- 15.17. Greater Exeter, with a population of approximately 260,000 and an electorate of 177,350, would be expected to operate with a council size in the region of 60 to 75 councillors, subject to the Local Government Boundary Commission's electoral review.
- 15.18. This range applies the LGBCE's three-criteria methodology (strategic leadership, accountability, and community leadership) and CIPFA benchmarking of comparable authorities. The expanded authority's distinctive mixed urban-rural geography, combining the city centre with market towns and extensive rural hinterlands, requires sufficient capacity for both intensive urban casework and dispersed rural community engagement. Exeter City Council currently has 39 councillors, whilst East Devon District Council has 60 councillors. At 60 councillors, the ratio would be approximately 1:2,956 electors per councillor; at 72 councillors, approximately 1:2,463; at 75 councillors, approximately 1:2,365. All ratios within this range provide effective representation, the exact number should be determined through proper electoral review.
- 15.19. Expanded Torbay, with a population of approximately 220,000 and an electorate of approx. 118,763, would be expected to operate with a council size in the region of 40 to 52 councillors, subject to the Local Government Boundary Commission's electoral review.
- 15.20. This range applies the LGBCE's three-criteria methodology and CIPFA benchmarking of comparable coastal authorities. Torbay Council currently has 36 councillors, established through the LGBCE's 2017 electoral review. The expanded authority, incorporating neighbouring communities would require additional representation to reflect its larger population and geography. At 40 councillors, the ratio would be approximately 1:2,969 electors per councillor; at 48 councillors, approximately 1:2,474; at 52 councillors, approximately 1:2,284. These ratios are aligned with those of Plymouth and Exeter, maintaining the intensive local accountability characteristic of coastal urban authorities whilst

- providing capacity for strategic leadership across the expanded area. The specific council size should be determined through electoral review following reorganisation.
- 15.21. This approach recognises that different settlement patterns naturally result in different representation ratios across the four proposed authorities. Critically, the precise council size for each authority should be determined by the Local Government Boundary Commission through its established electoral review process, informed by local consultation and the specific characteristics of each area. Whilst we have outlined expected ranges based on current council sizes, LGBCE methodology, and CIPFA benchmarking, the people of each area should have the final say on their own representation through a proper review process.
- 15.22. Urban authorities with compact geographies typically operate effectively at lower ratios than extensive rural authorities, reflecting intensive casework demands and complex partnership working. However, the exact balance between democratic accountability and council efficiency is a matter for each community to determine through the electoral review process.

#### The Path Forward

- 15.23. We note that the Local Government Boundary Commission for England (LGBCE) paused its electoral review of Plymouth pending the outcome of this reorganisation process. We therefore strongly recommend that the Government invites the LGBCE to complete a comprehensive electoral review across all four proposed unitary authorities once the new boundaries are confirmed. This would ensure:
  - Fair and consistent application of electoral equality principles across Devon
  - New warding arrangements that reflect both existing and newly incorporated communities
  - Appropriate councillor numbers determined in line with the Commission's established methodology.
- 15.24. The indicative ranges outlined above are intended to illustrate the anticipated scale of representation. However, the final determination of council sizes and ward boundaries should rightly rest with the LGBCE through its established review process. This approach upholds democratic legitimacy and ensures that decisions are made independently, without prejudging the outcome of the Commission's assessment.

#### **Electoral and Governance Model**

- 15.25. The strong Leader and Cabinet model will continue, with the Leader retaining authority to appoint up to nine Cabinet members. Cabinet portfolios may be adjusted to reflect the Council's expanded responsibilities, with discretion to introduce new roles for example, Rural Affairs or Parish Council Liaison.
- 15.26. Scrutiny arrangements will be strengthened and expanded to provide effective oversight of services across the enlarged area, ensuring robust accountability and attention to both urban and rural priorities.

# **Neighbourhood Networks for Community Empowerment**

- 15.27. This model is a direct response to extensive community engagement. The creation of innovative Neighbourhood Networks is designed to position the expanded Plymouth at the forefront of community-led governance. This approach is not a top-down imposition, this initial starting point is proposed following consultations with councillors and parish councils and is grounded in the findings of the comprehensive public engagement process.
- 15.28. That extensive engagement delivered a clear message: there is an unequivocal demand for governance that is responsive, transparent, and "rooted in local knowledge". Our proposal addresses this directly by creating a structural guarantee for local influence.
- 15.29. We have built this framework to address the key themes from our consultations:
  - Strengthening Parish Councils: Our approach is founded on the feedback that residents view their parish councils as "trusted, accessible, and deeply embedded in the fabric of local life". Acknowledging that the number one preference for future engagement is "Through my local parish council", our model is designed to strengthen their role, not diminish it.
  - Our Commitment to Fair Representation: A recurring concern was the potential for a "diluted rural voice". Our model provides a structural guarantee that rural communities will be fairly and effectively represented.
  - A Desire for Genuine Engagement: Residents made a clear distinction between meaningful engagement and "tokenistic or 'tick-box' exercises". This model is built on the principle of being "ongoing, not episodic, and rooted in a genuine commitment to codesign and collaboration".
  - A Preference for Incremental Development: Following feedback from councillors, we will adopt an incremental approach—building on what works, testing for progress, and positively growing the model over time.
  - The Importance of Partnership: In line with community feedback, the networks will ensure statutory partners like the police and health services are fully involved, enabling residents to have the right conversations with the right people.

#### Framework for Future Community Governance

15.30. The Neighbourhood Networks represent our proposed response to evolving expectations for local democracy. They will operate as collaborative forums bringing together ward councillors, parish representatives, community organisations, and key service partners. While this is our vision, we are clear that the final form and function of these networks must be determined through the community-led 'Test, Learn, Grow' process outlined below. They are not talking shops or another layer of bureaucracy. They are a practical enabler to enhance existing democratic structures.

# **Operating Principles**

15.31. Each network will be designed around natural community areas, recognising that rural parishes and urban neighbourhoods have different needs. This flexible approach directly responds to the strong emotional attachment residents have to their local identity and the fear of becoming "just another suburb". Ward councillors will chair the networks, providing democratic leadership and community coordination.

# Our Co-Design Process: A 'Test, Learn, Grow' Approach

- 15.32. This proposal intentionally avoids a rigid, pre-defined model for Neighbourhood Networks. We recognise that the tight timescale for submitting this proposal have not allowed for the significant, deep consultation required to develop a final model. Therefore, our approach is not to present a finished solution, but to outline a clear, community-led process to discover and build what works for each unique area, in line with the 'Test, Learn, Grow' methodology.
- 15.33. **Phase 1: Discover and Test -** This initial phase is about listening and experimentation, not imposing solutions.
  - **Listen Before Designing:** We will start with extensive community listening sessions. These will be informal conversations in community spaces where people already gather—coffee shops, community centres, school pickup points, and local markets. The goal is to understand how people experience local issues and what governance means to them in practical terms.
  - **Map Existing Networks:** Every community has informal leadership. We will identify the people others naturally turn to as our potential bridge-builders.
  - **Pilot Small Experiments:** We will test lightweight approaches before committing to formal structures. This could be a resident-led working group on a specific shared problem (like local green spaces or community safety), a community budgeting exercise for a small pot of money, or informal monthly "community coffee" sessions where the agenda emerges from what people bring.
- 15.34. **Phase 2: Learn and Refine -** We will capture not just data, but the stories and narratives that explain why certain issues matter so much to communities and how current systems fall short. We will work with residents to rigorously evaluate the pilots and experiments, creating a shared understanding of what works locally and why. This learning will be the foundation for the next phase.
- 15.35. **Phase 3: Design & Grow -** The rich learning from the pilots will directly inform the formal, co-designed structure of the mature Neighbourhood Networks. This ensures the final model is not imposed but is built from the ground up, owned by the community, and tailored to the unique character of each area. This iterative process allows us to scale up successful elements and create a truly responsive and enduring model for local democracy.

#### **Parish Partnership Agreements**

15.36. This approach is founded on the clear feedback from residents who view their Parish Councils as "trusted, accessible, and deeply embedded in the fabric of local life". Our agreements are therefore designed to empower and build upon this existing democratic foundation. Our model is built on strengthening, not supplanting, the first tier of local government. Enhanced partnership agreements will provide a framework for collaboration with parish councils that respects their local autonomy and established democratic processes. This includes opportunities for devolved responsibility for community-level service delivery and asset ownership, backed by support and training.

# **Training and Capacity Building**

15.37. The authority will implement comprehensive training programmes for both staff and councillors to embed community empowerment principles. Support will be provided for community organisations, parish councils, and resident groups to engage effectively through training on committee skills, project management, and partnership working where this is desired.

# Implementation Timeline

15.38. Networks will be active from vesting day and will develop to achieve mature operational capability soon after.

Figure 15.1

Year One

Dedicated to the 'Test & Discover' phase: conducting the deep community listening and launching the first small-scale pilots and experiments.

Year Two

Focus on the 'Learn & Refine' phase: evaluating the initial pilots and beginning to co-design the formal network structures based on that learning.

Year Three

The 'Design & Grow' phase, seeing a wider, flexible rollout of the co-designed models to achieve full operational capability.

#### Exeter

- 15.39. Exeter is proposing a multi-layered community neighbourhood governance model that builds on the proven success of its thirteen-year Wellbeing Exeter programme. At its heart are Local Area Neighbourhood Committees where partners use data and community insights to develop local strategies that inform budget and service delivery decisions. The model creates a bridge between hyper-local needs and strategic authority, with data and engagement flowing between the Strategic Mayor Authority, new unitary councils, Local Neighbourhood Area Committees, and Town and Parish Councils where actual delivery happens.
- 15.40. Since Exeter is currently an unparished area, the proposal includes conducting Community Governance Reviews to establish these new local governance arrangements, ensuring no democratic deficit and that the city's thriving VCSE sector continues to thrive through

evidence-based, co-produced structures that give neighbourhoods genuine power over how services are delivered

#### **Torbay**

- 15.41. Torbay intends to deliver enhanced community governance by building on its longestablished network of successful Community Partnerships, which have demonstrated effectiveness in local engagement and service delivery. The authority will maintain and strengthen these existing structures as foundations for neighbourhood-level engagement under the new arrangements.
- 15.42. Torbay's approach also includes the Place Leadership Board, which provides strategic place leadership and harnesses the power of anchor institutions locally, regionally, nationally and internationally. The council will use networks of Community Builders employing strengths-based approaches to help communities help themselves, alongside frameworks for Friends of Groups working in parks and green spaces. Torbay's model emphasises the need to preserve the distinct identities of "The Bay" and its three coastal towns, ensuring that community engagement reflects the strong sense of place and pride residents have in Torbay as a distinct sub-region.

### **Devon Coast and Country**

- 15.43. We would recommend that Devon Coast and Country adopts a similar 'Test, Learn, Grow' approach which would be undertaken in Plymouth, to ensure that neighbourhood governance arrangements reflect residents' understanding of their neighbourhood, rather than imposing predetermined structures.
- 15.44. Devon County Council has proposed a neighbourhood governance model that shares many similarities with Plymouth's approach. Both proposals recognise the importance of collaborative forums bringing together ward councillors, parish representatives, community organisations, and key service partners including police, health, the voluntary sector and emergency services. Both models propose annual action plans based on local data and insight.
- 15.45. However, the key difference between the two approaches lies in how these structures would be established. While Devon prescribes fixed numbers, Plymouth's model uses a community-led 'Test, Learn, Grow' co-design process where the number, operation and size of neighbourhoods would be developed through genuine community consultation, ensuring local arrangements reflect the diverse needs and identities of different communities.
- 15.46. Given the geographic scale of Devon Coast and Country, where NACs would cover significantly larger areas than in more compact urban authorities, this flexible, community-led approach becomes even more important to address the challenges of meaningful local engagement, particularly in the more dispersed rural and coastal communities.

#### **Our Commitment to the Future**

15.45. Ultimately, this proposal is about more than just governance structures. It is about building trust and delivering the future that residents told us they want to see. The work of the

Neighbourhood Networks will be directly aimed at creating the Plymouth of 2050 that emerged from the consultation: a city that is greener and more sustainable, safer for all residents, and built upon a "strong, inclusive community". By empowering communities to shape their own neighbourhoods, we can collectively build a city where everyone feels proud to live, work, and learn.

# **Better Services Across Devon**

# **Our Commitment to Safeguarding and Service Continuity**

- 16.1. The safety and safeguarding of all people receiving services is our absolute priority throughout this reorganisation and beyond. We are unequivocally committed to ensuring that no individual, whether a vulnerable child, adult at risk, or any person receiving care and support, will experience any reduction in the quality, safety, or continuity of their services during transition or in the new unitary structures.
- 16.2. Safeguarding duties under the Children Act 1989, the Care Act 2014, and all related statutory frameworks will be maintained without interruption. Robust safeguarding arrangements, oversight mechanisms, and multi-agency partnerships will remain in place and be strengthened throughout the reorganisation process. The protection of vulnerable people is non-negotiable and will take precedence over all other considerations in our implementation plans.

#### Services are local

- 16.3. The delivery of high-quality public services that are responsive to, and shaped by, local needs is the bedrock upon which good local government is built. Residents and businesses rightly expect their local council to get the basics right and provide services that are reliable and efficient. This includes regular waste collections, timely consideration of planning applications, well-maintained roads, high quality education and childcare, and the vital care and support for vulnerable children and adults.
- 16.4. Both Torbay and Plymouth's experience as a unitary authority demonstrates that authorities of this scale can deliver excellent services. The four-unitary model extends these benefits across Devon-
  - Plymouth and Exeter can focus on urban service challenges including housing, regeneration, and young populations
  - o Torbay continues tailored services for its coastal community and ageing demographic
  - Devon Coast and Countryside can design services explicitly for dispersed rural geography rather than imposing inappropriate urban models
- 16.5. This tailored approach delivers better outcomes than any single large authority attempting to serve incompatible urban and rural needs.
- 16.6. Rising demand, cost and complexity in critical public services such as Adult and Children's Social Care and SEND is creating financial pressure for many councils. Reorganisation offers an opportunity to do things differently and to inject new ideas and localised, place-based approaches.
- 16.7. Our current landscape of unitary and two-tier councils, while home to areas of excellence, is a product of history. It creates artificial barriers that prevent the truly joined-up services that modern public service delivery requires and that our residents deserve. This is a moment of opportunity, and we must be structured to seize it.

- 16.8. This proposal outlines a vision to build on the county's considerable strengths by creating four unitary councils, each designed to unlock the full potential of the communities they serve:
  - An expanded Plymouth Extending a proven model of integrated service delivery across its natural community and economic area.
  - An expanded Torbay Scaling up a track record of innovation and nationally recognised excellence.
  - An expanded Exeter Creating a strategic authority to build sustainable, thriving communities.
  - **Devon Coast and Countryside** Providing a dedicated champion for the unique needs of our rural and coastal areas.
- 16.9. This reform will create simpler, stronger, and more strategic local government. It will allow us to extend our best and most innovative services to more people, delivering better outcomes and creating a healthier, more prosperous future for every resident in Devon.

# A Foundation of Strength and a Vision for the Future

16.10. The case for reorganisation is not about fixing what is broken but about unlocking what works. Across Devon there is outstanding service delivery, innovative partnerships, and nationally recognised success, however, these strengths are often constrained by a fragmented local government structure.

### **Recognising the Models of Excellence**

- 16.11. As a unitary authority, **Plymouth** has developed sophisticated, integrated services that are already delivering for residents. Plymouth has created a social care model where users report levels of 'control over their daily life' Adult Social Care Outcome Framework (ASCOF Measure 4A) that are significantly higher than the national average. This is complemented by an award-winning planning service that determines 100% of major applications on time and a highways service that maintains local roads to a standard better than the regional average. This demonstrates a clear capacity for high-quality, strategic delivery.
- 16.12. **Torbay Council** provides definitive proof of what a focused unitary authority can achieve. Its Children's Services are rated 'Good' by Ofsted, a testament to a successful transformation that now delivers strong outcomes. In adult services, its innovative model for managing the interface with the NHS has resulted in performance on 'delayed transfers of care' that is dramatically better than the national average.
- 16.13. Within the two-tier system, **Devon County Council** has established a clear strategic success in supporting older people. Its adult social care service achieves significantly lower rates of permanent admissions to care homes than the national average (ASCOF Measures 2A & 2B), demonstrating a successful focus on helping people to live independently in their own homes for longer.

16.14. The challenge is that this excellence is contained by administrative boundaries. The reorganisation will break down these barriers, allowing us to build a future for all of Devon based on our best and most successful models.

#### A foundation built on what works

- 16.15. As a unitary authority, Plymouth has developed sophisticated, integrated services that are already delivering strong outcomes for residents. The Council's approach demonstrates how unified structures create the conditions for innovation and high-quality service delivery. Planning services have achieved national recognition through multiple Royal Town Planning Institute awards, including three Silver Jubilee Cups, a distinction no other authority has matched, whilst the joint health and social care model with Livewell Southwest has received positive assessments in recent Care Quality Commission (CQC) reviews.
- 16.16. The challenge Plymouth faces is one of geography, not performance. Administrative boundaries currently constrain the Council's ability to extend these proven models across the natural community and economic area. The reorganisation addresses this fundamental issue, creating a geography that reflects how people live their lives, access services, and engage with their local economy.

#### **Children Services and Education**

# **Protecting the Improvement Journey**

- 16.17. Plymouth's children's services are progressing well following the January 2024 Ofsted assessment, which recognised strengthened practice. Once Government has decided the pattern of government, the subsequent implementation plan will demonstrate how we will protect this improvement trajectory, and those in wider Devon, ensuring that the Director of Children's Services can maintain focus on completing the transformation programme.
- 16.18. Detailed implementation planning will include ring-fenced governance to protect the Improvement Board's work, clear timelines that avoid disruption to critical improvement milestones, and measurable performance targets covering workforce stability, caseload levels, and statutory compliance rates.

#### **Delivering Stable Homes, Built on Love**

- 16.19. The expanded Plymouth authority will be structured to deliver the Government's *Stable Homes, Built on Love* vision through fully integrated, multi-agency Family Help services that the National Framework demands.
- 16.20. Plymouth's Children's Transformation and Improvement Project implements five key design principles including workforce stability, with the new Target Operating Model supporting reduced social worker turnover, localities structures integrating education and social care services, and targeted work to address adolescent care issues. Ofsted's January 2024 assessment confirmed services "require improvement to be good", recognising strengthened practice in case summaries, supervision, visits, and plans. The Council has established a clear transformation plan to develop, sustain and embed good practice across all areas of service delivery.

16.21. Extending Plymouth's boundary will create greater consistency in children's services across what is functionally a single community. The expanded area will enable a more unified approach to family hubs and preventative services directly addressing one of the key improvement priorities identified by Ofsted, whilst ensuring families receive seamless support regardless of historical administrative boundaries.

# **Manageable Demand Integration**

- 16.22. Middle Super Output Area (MSOA) level analysis reveals that the extension area contributes negligible additional demand across all key children's social care metrics. The area's low population density and demographic characteristics result in substantially lower service demand compared to Plymouth's urban core, confirming that the expansion can be managed within existing operational capacity.
- 16.23. Plymouth's established children's social care infrastructure, workforce, and systems can effectively absorb this minimal additional demand without requiring significant structural changes or service disruption. The extension represents an opportunity to extend proven practice and quality standards across a natural community area whilst maintaining service continuity for all families.

# Family Hubs and Early Help

- 16.24. Plymouth's existing Family Hubs, delivered in partnership with Barnardo's, Lark, and Action for Children, provide an established platform for integrated family support. The unified structure will enable strategic coordination across service boundaries that currently hinder effective delivery. Plymouth's Family Hubs already demonstrate integrated approaches through "no wrong door" access and "tell my story once" assessments.
- 16.25. Extension across the enlarged area will provide seamless family support services that currently require navigation across multiple authorities, bringing high-quality integrated services to all families. Plymouth's Family Hubs already provide a fully integrated offer to families, enabling early support from the first point of contact and ensuring families only need to tell their story once to access a range of support services.

# **SEND Services Strategic Enhancement**

- 16.26. The analysis showing higher reliance on expensive independent sector provision in the extension area represents a genuine opportunity for strategic improvement but requires careful development to ensure any changes improve outcomes rather than simply reduce costs. Strategic SEND planning will be developed in close partnership with parents, schools and health partners to strengthen the support available to children with SEND and their families.
- 16.27. Once Government has decided the pattern of government, the subsequent implementation plan will include meaningful engagement with service users, including documented consultation with care leavers, foster carers, and young people with SEND.
- 16.28. A single authority can more effectively address identified SEND provision challenges through comprehensive strategic coordination across the functional catchment area. Unified arrangements enable more coherent SEND provision planning, eliminating boundary issues

that currently complicate service delivery and creating opportunities to reduce high-cost placements through strategic sufficiency planning whilst ensuring all children can access appropriate provision closer to home.

# **Workforce and Multi-Agency Coordination**

- 16.29. Ofsted praised Plymouth's highly effective recruitment and retention, which created a stable permanent workforce with manageable caseloads. Once Government has decided the pattern of government, the subsequent implementation plan will set out specific commitments to maintain this stability, including protection of terms and conditions for transferring staff and measures to sustain current caseload levels throughout transition.
- 16.30. Given Devon County Council's ongoing intervention under a commissioner appointed in June 2025, the implementation plan will also demonstrate how Plymouth will engage constructively with the Commissioner's mandate and how the boundary change will be managed within existing multi-agency partnerships.

# **Adult Social Care and Wellbeing**

# **Extending the "Gloriously Ordinary Lives" Vision**

- 16.31. Plymouth's joint delivery model with Livewell Southwest, established in 2015, represents mature leadership in integrated health and social care. The current vision of "Gloriously Ordinary Lives" provides a framework for people to live "their best life doing the things that matter to them, in a place they call home and supported by their own thriving connected community, able to access high quality advice, information and timely local services and support, where appropriate, in a way that they choose."
- 16.32. Performance data demonstrates the effectiveness of this approach. Plymouth residents report levels of 'control over their daily life' (ASCOF Measure 4A) that are significantly higher than the national average. The service also achieves strong performance in reablement (Measure IE), helping older people return home from hospital, whilst the integrated model supports effective delayed transfers of care (ASCOF Measure 2C).

# **Strategic Service Integration**

- 16.33. Analysis of MSOA-level demographic and service usage data confirms that the extension area represents a modest increase in adult social care demand. The extension area's population characteristics, age profile, and existing service patterns indicate that additional demand will be minimal and well within Plymouth's established operational capacity.
- 16.34. Plymouth's established adult social care infrastructure can absorb the additional demand whilst extending proven integrated health and social care delivery models to benefit all 300,000 residents of the expanded area. Many of the service providers operating in this area have an existing relationship with the Plymouth Commissioning Team as there is a natural flow of individuals between the areas when they access support. The extension represents an opportunity to eliminate service fragmentation caused by arbitrary administrative boundaries whilst maintaining high-quality provision for all residents. The expanded area aligns neatly to the footprints of Primary Care Networks that currently straddle administrative areas and

- supports the development of natural neighbourhoods being developed under local Integrated Neighbourhood Team development.
- 16.35. Plymouth has a long history of integrated commissioning with NHS partners, and has operated a joint market position statement, single integrated contracts with social care providers and joint market engagement. Plymouth is the only area in Devon where this is fully embedded, and this approach has reduced fragmentation and duplication between health and social care commissioning. This approach ensures care providers experience a 'single Plymouth commissioning voice' and residents receive seamless care provision as they move between health and social care funding. In conjunction with our integrated Health and Social Care provider (Livewell) residents in the expanded area would receive truly joined up, person centred care.

# **Comprehensive Improvement and Innovation**

- 16.36. A comprehensive improvement plan addresses all aspects of adult social care through five distinct programmes: improving waiting times and experience, vision and strategy development, people and practice enhancement, The Meadow View development, and direct payment services enhancement.
- 16.37. The £27 million investment in The Meadow View project consolidates The Vine and Colwill services into a purpose-built centre for people with learning and physical disabilities. Scheduled for completion in July 2026, this facility will serve the entire extended area as a flagship resource providing innovative care approaches and community integration opportunities.

#### Improvement in Reablement Services

- 16.38. Plymouth is implementing a comprehensive reablement programme, starting October 2025, that aims to transform how Adult Social Care supports people to regain their independence. The programme vision focuses on remaining independent and effective self-led life assessment, moving away from traditional service-dependent models towards community-based approaches that prevent escalation of need and reduce reliance on statutory services.
- 16.39. The programme places strong emphasis on recovery, rehabilitation, and outcome-focused support, ensuring that individuals are empowered to regain independence and live well in their communities. Through collaboration working between Livewell Southwest, Plymouth City Council's Place Directorate, and other partners, the programme strengthens connections between what services can do for people and what individuals can see they could do differently. This approach aims to maximise independence and the efficiency of existing services whilst improving long-term outcomes across reablement, community outreach, independence at home service, and technology-enabled care.
- 16.40. Key milestones include achieving 80% of people aged 65 and over remaining at home 91 days after discharge from hospital, with reablement capacity increased by 20% through workforce and referral pathway redesign. The programme targets a 25% reduction in long-term care packages through accelerated reviews of existing packages, with an anticipated annual saving of around £500,000 alongside a 10% improvement in independence outcomes at the point of reviews. The service aims for a 15% improvement in independence outcomes at the point of review, with a 10% reduction in response times and 20% increases in outreach coverage.

- 16.41. The programme encompasses strategic reduction in long-term care dependency through a robust and proactive system for reviewing existing care arrangements and making timely interventions. This supports system sustainability, reduces demand pressures, and improves individual outcomes. The pathway to independence at home service focuses on building networks for enhanced community-based support through targeted operational improvements, ensuring timely interventions, reduced delayed discharges, and step service delivery pathways.
- 16.42. Innovation through technology-enabled care represents a careful and measured approach. The programme will implement and evaluate technology solutions that support independence including artificial intelligence applications where appropriate. These tools aim to enhance service efficiency, enable early identification of needs, and support timely interventions. Operational excellence in community outreach focuses on redesigning and streamlining how the service responds to enquiries, providing easier access and place-based delivery through wellbeing hubs, enhanced access routes, reduced waiting times, and strengthened local offer. This strategic shift empowers people to live independently, reduces service dependency, and positions the service as a pivotal entry point across front door services that helps individuals reframe their needs and engage with community assets.

# Wellbeing Hubs and Integrated Support

- 16.43. Plymouth's Wellbeing Hubs received strong ratings during Local Government Association peer review, with clear recognition of their potential to reach more residents across communities. The "no wrong door" approach through locality networks aligned to wellbeing hubs and family hubs provides seamless, integrated support across health, social care, and community services.
- 16.44. Many commissioned care providers and voluntary sector partners including Age UK and YMCA already operate across the current Plymouth-Devon boundary, including care homes, domiciliary care agencies, supported living providers, residential children's homes, foster care and supported accommodation providers. This existing cross-boundary working provides a foundation for seamless service extension whilst the Older Persons Strategy incorporating adult social care, housing, leisure, social inclusion, and transport issues can be extended to support the growing older population across the expanded area.

#### Housing and Planning

# Strategic Response to the Housing Crisis

- 16.45. By setting the Local Planning Authority (LPA) across a larger area, an expanded Plymouth authority will deliver a far more effective and strategic response to the region's housing crisis than is possible through the current arrangements.
- 16.46. Decisions about the form and location of new development will be able to be made in the context of understanding the city's functional area and its relationship to surrounding rural settlements and the countryside. This will help the new LPA to meet the area's housing requirement in a manner which is the most sustainable, safeguarding the special characteristics of the rural environment and optimising the use of land in the city. Through coordinated planning and delivery across area more sensible planning area, there will be

- considerable opportunities a more strategic approach to infrastructure delivery, supporting the provision of services to ensure that new and existing homes have the facilities and accessibility they need.
- 16.47. Plymouth's Homelessness Recovery Programme features seven dedicated action plans that successfully address complex housing challenges across the prevention spectrum. The programme has delivered 78 new units of temporary accommodation for homeless families since 2023 with 95 more in the pipeline, whilst implementing strategic approaches that have we achieved a 66% reduction in 2024/25 from the previous year of the number of families in Bed and Breakfast accommodation through innovative planning and partnership working.

# **Highways and Transport**

### **Highway Service Excellence and Innovation**

- 16.48. Plymouth's highway service manages two distinct categories of assets: the resilience network which carries most of the traffic that affects the economy, and the unclassified network for local access. The authority has successfully implemented cost-effective maintenance strategies, with surface dressing reducing resurfacing costs from approximately £50 per square metre to £10 per square metre whilst delivering substantial improvements. The expanded area will provide economies of scale for highway maintenance activities such as surface dressing and velocity repair systems.
- 16.49. Residents will benefit from the extension of a best-in-class highways service, which already maintains local A, B and C roads to a standard better than the regional average. The expansion of Plymouth presents significant opportunities for highways and transport integration through strategic coordination and economies of scale.
- 16.50. Key highway assets including condition monitoring systems, emergency response capabilities, and technical expertise can be extended across an expanded Plymouth, providing enhanced service delivery to rural communities whilst maintaining Plymouth's established standards for the resilience network that supports the city's economic functions.
- 16.51. Plymouth's highway service has demonstrated innovation through development of commercial opportunities, including CCTV monitoring services. With the current Southwest Highways contract period ending in 2027, there are opportunities to adopt more dynamic approaches including potential trading company models that could reduce costs whilst increasing commercial opportunities.

#### **Strategic Transport Investment**

16.52. Plymouth's role hosting the sub-national transport body positions the council as a regional leader in transport planning and delivery. The authority will build on the area's high bus usage, which currently stands at 15.5 million passenger journeys a year, using its £311.4 million Bus Services Improvement Plan to improve connectivity for all. Combined with the £706.3 million strategic transport infrastructure investment, this demonstrates the scale of transport transformation already underway.

16.53. The Enhanced Bus Partnership with local operators creates a proven model for public transport coordination that can be extended across the enlarged area, improving connectivity whilst reducing car dependency and supporting sustainable development patterns.

#### **Environment and Waste**

# **Waste Collection and Recycling**

- 16.54. Plymouth currently operates comprehensive environmental services including domestic waste collection for residual waste, recycling, and garden waste, with food waste collection planned to commence in late April 2026 which will add nine additional rounds.
- 16.55. Whilst no changes to rounds will be made on or immediately after vesting day, there will be a future opportunity to integrate including the redesign and optimisation of collection routes across the combined areas, which could deliver cost savings whilst improving service delivery.

#### **Environmental Infrastructure**

16.56. The delivery and coordination of environmental infrastructure is illustrated by Plymouth's leadership of the Plymouth and South Devon Community Forest a new project that will see thousands of new trees planted across the city. It will stretch from the heart of the city to the edge of the moor, encompassing 1,900 hectares of land to form a mosaic of different forest habitats. The City Council is also leading on other environmental programmes working closely with the National Trust, the Environment Agency, and South West Water.

# **Grounds Maintenance and Environmental Management**

- 16.57. The authority manages extensive grounds maintenance operations covering 20,000 individual grass areas, play parks, and sports pitches, alongside arboriculture services. Environmental planning services will be integrated with grounds maintenance and arboriculture to form a unified service structure, providing opportunities for coordinated approach to environmental management across the expanded area.
- 16.58. Plymouth's highly proactive approach to supporting a more sustainable and net zero city will be able to be rolled out across the wider area, enabling it to benefit from being part of Plymouth's Net Zero Partnership and wider initiatives to deliver environmental and decarbonisation outcomes. Since 2016, the Council has secured over £450m in external grants for net zero infrastructure and other projects, delivering a total investment of over £662m (and this excludes substantial grants for major highways projects that also deliver improved active travel and public transport opportunities).
- 16.59. The integrated approach to environmental management supports coordinated climate action implementation across the natural geographic area, enabling more effective resource management and environmental protection that recognises ecological boundaries rather than administrative divisions. The strategic approach includes comprehensive environmental monitoring, coordinated biodiversity enhancement, and integrated approaches to sustainable development that support both environmental protection and economic growth.
- 16.60. The proposed expansion creates a unified structure that eliminates service fragmentation whilst extending Plymouth's proven capabilities across crucial services to benefit all residents.

Plymouth's leadership in social care innovation, children's services development, SEND provision, homelessness prevention, planning, and economic development creates substantial opportunities for the extended area.

#### A Cohesive and Ambitious Future for All of Devon

16.61. The creation of an expanded Plymouth authority is the cornerstone of the proposal, but the vision for a better Devon is incomplete without tailored plans for the rest of the county.

# **Expanding Torbay - Balancing Opportunity with Risk Management**

16.62. The expanded Torbay authority presents significant opportunities to build on the council's impressive track record of innovation and high performance, offering the potential to scale a proven model of integrated service excellence across a wider South Devon geography, whilst requiring careful management to preserve the achievements that make Torbay a national exemplar.

# **Preserving Integrated Care Excellence**

- 16.63. Central to Torbay's success is its nearly twenty-year pioneering approach to integrated health and social care. The Integrated Care Organisation (ICO) has been described as "a pathfinder and national leader" in delivering seamless services maintaining exceptional delayed transfer of care performance that ranks among the best nationally.
- 16.64. Whatever the outcome of reorganisation, this model must be protected. Expansion offers opportunities to extend this nationally recognised approach across a wider coastal geography facing similar demographic challenges. The ICO model's integrated neighbourhood approach, community support model which diverts residents from statutory services, and close relationships with the voluntary sector could benefit a larger population whilst maintaining the localised delivery that has been fundamental to its success.
- 16.65. However, expansion would require careful planning to ensure the model remains coherent and effective at larger scale. The authority would need to maintain strong NHS partnership arrangements whilst extending them to cover additional Primary Care Networks, creating seamless care pathways across the enlarged area without diluting the integration that characterises Torbay's achievement.

#### A Centre of Excellence for Children's Services

- 16.66. As the only authority in the area rated 'Good' by Ofsted, the expanded Torbay could become a recognised centre of excellence for children's services. The council's transformation journey, built on restorative practice and workforce engagement, has achieved remarkable results with notably low social worker vacancy rates.
- 16.67. In February 2023, Torbay became the first UK local authority awarded Registered Restorative Organisation status by the Restorative Justice Council. The Learning Academy's "grow your own" approach to recruiting and developing social workers offers potential to benefit children and families across a wider South Devon geography.

- 16.68. The opportunity to extend this excellence requires balanced consideration. Expansion would enable Torbay's restorative practice framework to benefit a larger cohort of children and families, with the Learning Academy model creating career development pathways across the enlarged area. However, protecting current performance during any expansion requires careful transition planning, maintaining workforce stability, and ensuring the restorative culture can be embedded across new teams. The authority would need to preserve the focused leadership and clear accountability that has been fundamental to Torbay's improvement journey.
- 16.69. The authority demonstrates strong cost control in children's services despite high demand pressures. Through the Safety Valve intervention programme, Torbay is successfully addressing High Needs Block pressures with a clear deficit recovery plan, progress that could be maintained within stable boundaries. Strategic SEND planning across a larger geography could create additional opportunities for sufficiency planning and local provision development, whilst requiring coordination to maintain progress on deficit reduction.

#### **Environmental Leadership**

16.70. Torbay demonstrates exceptional environmental stewardship with zero municipal waste going to landfill compared to regional and national averages, alongside significantly lower greenhouse gas emissions per capita than both the Southwest and England averages, performance that could be extended across an expanded area. The unified authority could develop comprehensive environmental strategies addressing coastal erosion, flood risk and biodiversity protection at a scale matching ecological boundaries

# **Exeter - A Strategic Hub for Sustainable Communities**

16.71. Greater Exeter would bring together Exeter's strategic role as a major transport hub and UNESCO City of Literature with the surrounding market towns and communities across East Devon, Mid Devon and Teignbridge that form its natural catchment.

# **Integrated Service Delivery Model**

16.72. The Greater Exeter authority would operate through a multi-level service delivery model combining strategic functions at authority level with place-based delivery through locality teams. This structure addresses the area's diverse characteristics, from the dense urban core of Exeter to market towns and rural communities. The authority would develop clear neighbourhood governance arrangements in line with the English Devolution and Empowerment Bill, building on existing parish and town council structures whilst creating new capacity for community engagement in urban areas.

# **Strategic Housing and Growth Coordination**

16.73. A unified authority could accelerate delivery of significant housing growth, coordinating the Liveable Exeter programme within the city with strategic growth sites east and southwest of Exeter. By bringing housing, planning, transport and infrastructure under single strategic control, the authority could overcome the fragmentation that has hindered the Greater Exeter Strategic Plan, ensuring new communities receive the schools, health services and transport connections needed from day one.

16.74. The authority's unified planning powers enable strategic infrastructure delivery across the entire functional area. Major transport corridors, strategic drainage, education provision and healthcare facilities can be planned holistically, creating conditions for sustainable growth that meets housing need whilst protecting environmental assets. The Housing Delivery Test confirms Greater Exeter's strong recent performance at 108% delivery against target for 2020/21 to 22/23, providing a foundation for continued delivery at scale.

# **Opportunities to Address Critical Service Gaps**

- 16.75. Greater Exeter has significant opportunities to develop adult social care strategically through integration of housing, planning and commissioning powers in adult social care that a unified authority would be well-positioned to address. The area requires substantial additional care home capacity to support older people with complex needs and dementia, with the majority of this need concentrated in East Devon and Exeter. The area also faces considerable Extra Care housing deficits. A new authority could integrate housing, planning and social care powers to strategically commission and deliver Extra Care housing, embedding provision within city regeneration schemes and brownfield developments.
- 16.76. The authority could leverage Wellbeing Exeter and established community infrastructure to develop neighbourhood-based adult social care aligned with NHS Primary Care Network boundaries, addressing current over-reliance on residential care placements. Through integrated commissioning with NHS partners, the authority could strengthen hospital discharge pathways and expand reablement services focused on maintaining independence.
- 16.77. Greater Exeter's projected population growth in older age groups, particularly those aged 75 and over, requires proactive investment in Extra Care housing, enhanced domiciliary care capacity and specialist dementia services. The unified authority's integrated housing and planning powers enable strategic provision embedded within new developments from the outset rather than as an afterthought. Working with developers, housing associations and care providers ensures new housing growth includes appropriate care infrastructure.

# A Catalyst for Children's Services Transformation

- 16.78. Devon County Council's children's services have been rated Inadequate by Ofsted since 2020, with recent reinspection in September 2024 finding the authority still inadequate. The creation of Greater Exeter authority would provide a necessary catalyst for transformation, enabling a fresh start with new leadership and clear accountability.
- 16.79. Local government reorganisation offers the opportunity to build transformation capacity, with the authority able to leverage the University of Exeter and Exeter College to create structured pipelines into social care careers. Using local housing and economic development powers to provide affordable housing for social workers, educational psychologists and SEND caseworkers could directly address the workforce retention challenges that have hampered improvement.
- 16.80. By aligning education, housing, health and employment services under single strategic control, the authority would be well-placed to deliver the integrated "Family Help" services and Best Start Family Hubs mandated by the new Children's Social Care National Framework, ensuring comprehensive early intervention support.

#### **Locality-Based Children's Services**

- 16.81. The authority would implement locality-based children's services integrating early help, children's social care, youth services and SEND provision. These locality teams would create accessible local presence across the authority's geography whilst maintaining sufficient scale for specialist expertise and management oversight. Working in partnership with schools, health services and voluntary sector organisations, locality teams would deliver coordinated multi-agency support with clear accountability.
- 16.82. The authority's access to the University of Exeter, Exeter College and other educational institutions creates opportunities for structured social work pipelines and workforce development. Strategic use of integrated housing and economic development powers can support affordable accommodation for key workers, addressing retention challenges where high housing costs create recruitment barriers.

#### **SEND Service Development**

- 16.83. Greater Exeter requires strategic SEND planning to ensure appropriate local provision and reduce reliance on expensive independent sector placements. The unified authority enables comprehensive planning across education, social care and health, developing specialist resourced provision in mainstream schools, expanding local special school capacity where needed, and creating appropriate post-16 pathways.
- 16.84. Working in partnership with schools, parents and health colleagues, the authority would strengthen universal and targeted support whilst ensuring appropriate specialist provision where needed. Unified planning enables effective quality assurance, strategic workforce development for SEND specialisms, and coordinated transitions between education phases and into adulthood.

#### Devon Coast and Countryside - Tailored Services for a Unique Landscape

16.85. This new authority would provide a bespoke solution for Devon's vast rural and coastal communities, designed to address the distinct challenges of an aging population across dispersed geography while building on established strengths in adult social care and environmental services.

#### **Locality Model for Rural Delivery**

- 16.86. The authority would operate through a locality model explicitly designed for dispersed rural and coastal geography. Locality teams based in key market towns would provide accessible local presence for residents whilst maintaining the scale needed for specialist capacity and resilience. These teams would integrate services currently split between county and district councils, creating coherent delivery across housing, planning, adult social care, children's social care and community services.
- 16.87. The locality structure enables services to be shaped by and responsive to local communities rather than imposed from distant centres. Working extensively with town and parish councils, voluntary sector partners and community organisations, the authority would harness local knowledge and community connections that are essential for effective rural

- service delivery. Each locality would develop place-based approaches flexing to meet the varying needs across different communities, from coastal towns to moorland villages, from commuter settlements to agricultural heartlands.
- 16.88. Strategic authority-wide functions would provide consistency, specialist services that benefit from scale, and infrastructure supporting local delivery. This includes commissioning of specialist adult social care and children's placements, strategic workforce development, emergency planning, and major infrastructure projects that serve the whole authority area.

#### Responding to Demographic Realities

16.89. The authority would serve a substantial population with significant projected growth in older age groups, particularly among the oldest residents. This aging profile, combined with higher dementia prevalence in coastal districts and higher long-term residential care admission rates in more rural districts, requires a service model fundamentally different from urban areas. The authority could focus investment on preventing costly residential placements by expanding Extra Care Housing, reablement, and community support that enable people to live independently longer, with potential for significant annual savings.

#### **Building on Devon's Adult Social Care Strengths**

- 16.90. Devon County Council's adult social care performs strongly, with comprehensive CQC self-assessment underway and strong satisfaction measures. The council has achieved consistent financial performance with a clear practice model emphasising quality of life, strengths-based approaches, and early prevention. Any future Devon Coast and Countryside authority should build on these foundations, minimising disruption whilst realising benefits of integrating district council housing and community services functions.
- 16.91. The authority's scale enables strategic commissioning working effectively with Devon's predominantly small and medium-sized care providers who offer essential hyper-local knowledge and community connections. Rather than favouring large national providers, the authority can develop the local care market through strategic partnerships, quality development support, and fair pricing recognising genuine costs of rural delivery.

#### **Hyper-Local Service Delivery Model**

- 16.92. A "hub-and-spoke" model could ensure specialist services reach key market towns while deep partnerships with town and parish councils deliver truly local responsiveness. The authority could develop place-based commissioning strategies that work with Devon's predominantly small and medium-sized care providers, who offer hyper-local knowledge, to build market resilience and ensure the right care is available close to home.
- 16.93. The locality model would integrate housing, social care, and community services with NHS and voluntary sector partners where beneficial. This approach would address the reality that domiciliary care costs in Devon are among the highest in the Southwest due to rurality and travel distances, requiring innovative solutions like expanding Shared Lives placements, which offer substantially lower costs compared to residential care while promoting independence.

#### **Children's Services Improvement**

- 16.94. For children's services, local government reorganisation provides an essential opportunity to address the sustained failure that has persisted in Devon County Council's provision.
- 16.95. A rural-focused authority could concentrate on building the necessary capacity for improvement without the distraction arising from the higher levels of need and demand in urban centres. This would enable implementation of the National Framework's preventative approach adapted specifically to rural community contexts.

#### **Devon's Financial Resilience**

#### Financial Resilience - Context

- 17.1. Our proposal will lead to ongoing savings in the cost of running local government across Devon, delivering significant efficiencies and value for money for taxpayers through a reduction in the number of councils from 11 to 4. The financial case prepared in collaboration with Exeter City Council, is presented in detail in the appendix. where we have set out the cost data, assumptions, evidence, and methodology in detail.
- 17.2. Plymouth's expansion is financially robust, yielding an annual benefit of £6 million against a one-off transition cost of £4.9 million. For all four unitary authorities in Devon, the overall financial case for our modified proposal is highly compelling
  - The total investment is £70.1 million (Transition Costs).
  - This investment quickly pays for itself, with a full payback achieved by Year 3.
  - The new structure generates £58 million in Net Annual Benefit by Year 4
- 17.3. This plan represents excellent value for money and significantly strengthens the financial resilience of the entire Devon region. This section summarises the financial case for our base proposal (and our modification) across Devon, and demonstrates, for the modification proposed, that each of the four authorities created will be financially viable putting local government in Devon on a firmer financial footing. The financial case for a modification of the base proposal is explained through a comparison of the viability of four local authorities on existing district boundaries with the (more sustainable) modification proposed, which improves financial sustainability significantly.
  - 17.4. This section also reviews the balance sheet position of Devon's local authorities, examining risks relating to council debt and financial resilience. Implementation costs are estimated and broken down for each of the four new councils, and the cashflow and financing implications of implementing a new model of local government are explained across a medium-term transition period, showing how implementation costs are repaid over time through efficiency savings and the release of capital receipts. Finally, this section summarises the position relating to inherited council tax rates for each of the proposed four new council areas.

#### Viability and financial sustainability

#### Overall resources: comparing the financial size of new proposed unitary councils

17.5. Figures 17.1 and 17.2 below show how the size, in overall resource terms, of the proposed unitary councils compares to existing English single-tier councils. Whilst in the base proposal (figure 17.1), the proposed Torbay and Exeter unitaries are relatively small in overall resource terms, figure 17.2 shows how the modified proposal puts all of the proposed councils into the middle quartiles when compared to existing English unitaries.



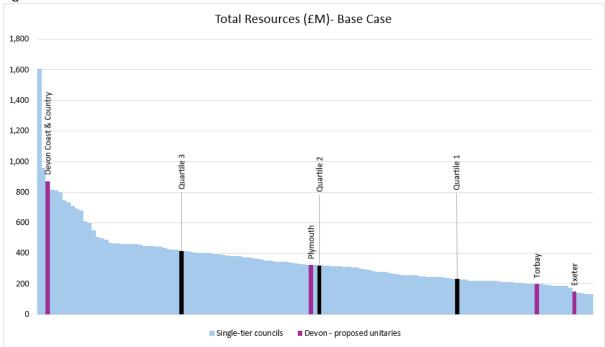
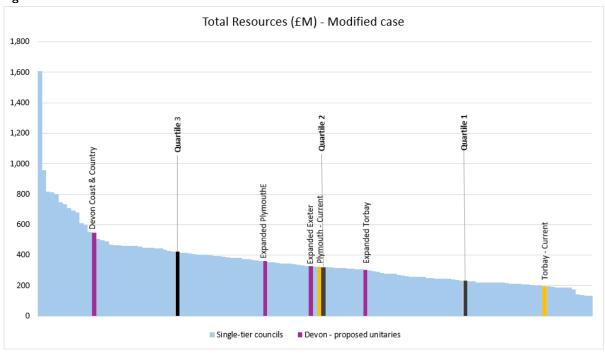


Figure 17.2



#### Viability: estimated costs compared to estimated income

17.6. We have used detailed financial modelling to compare estimated costs with estimated income for the proposed unitaries. This analysis uses reported RA return and taxbase data as the basis for modelling cost and council tax income at current prices, with specialist forecasts of Business Rates and Revenue Support Grant income (together, the estimated Settlement Funding Assessment) provided by PIXEL, expert consultants in local government finance and funding. The Settlement Funding Assessment forecasts for each proposed unitary have used

the formula funding approach proposed in the Government's recent Fair Funding Review 2.0 consultation, which is anticipated to have a significant impact on local authority funding in Devon as a whole and for each proposed council. The Estimated Net Cost of Service shown table 17.1 below includes the assumed savings detailed in table 17.4 (though not the 'stretch' savings, where there is less assurance over delivery). Forecast costs and taxbase use a 2025/26 baseline position, and SFA income has been scaled back to a 2025/26 price base to ensure comparability. The methodology and approach is explained in more detail in the appendix; the position on Dedicated Schools Grant and Housing Revenue Account ring-fenced funding is explored separately below.

17.7. Tables 17.1 and 17.2 below summarise the modelled position for the base and modified proposals:

Table 17.1

TUDIC 17.1					
	Estimated costs & income (£m) - Base Case				
	Devon Coast & Exeter Plymouth			Torbay	
NET COST OF SERVICES:	751.8	181.7	315.8	185.0	
funded by:					
Settlement Funding Assessment	235.4	77.7	164.2	89.3	
Council tax	559.9	79.2	147.9	95.9	
TOTAL CORE SPENDING POWER FUNDING:	795.3	156.9	312.2	185.2	
Viability surplus / (gap) in funding	43.5	- 24.8	- 3.6	0.2	

Table 17.2

	Estimated costs & income (£m) - Modified Case				
	Devon Coast & Countryside	Expanded Exeter	Expanded Plymouth	Expanded Torbay	
NET COST OF SERVICES:	503.5	316.4	338.4	276.8	
funded by:					
Settlement Funding Assessment	143.9	144.0	163.5	116.3	
Council tax	367.4	177.0	177.8	163.3	
TOTAL CORE SPENDING POWER FUNDING:	511.3	321.0	341.2	279.6	
Viability surplus / (gap) in funding	7.7	4.6	2.8	2.8	

17.8. Our modelling forecasts that an Exeter Unitary on current district boundaries (the base case proposal) is likely to have costs that exceed its income – with a large funding gap which will pose a significant financial challenge. On current boundaries the changes to formula funding modelled by PIXEL suggest that both Plymouth and Torbay are likely to face financial challenges (though less significant). Under the modified proposals, Exeter, Torbay and Plymouth authorities our analysis shows an improved financial position when comparing costs with income for an expanded Exeter, Torbay and Plymouth unitaries, with the rural / coastal Devon council still showing a healthy surplus in funding. Analysis suggests that the modified proposal would create four viable unitary councils, with a modelled surplus providing some resilience against demand pressures or other financial shocks.

#### **Dedicated schools grant & SEND**

17.9. In common with other areas in England, the structural imbalance of costs and income for Special Educational Needs and Disabilities services poses the most significant threat to

financial viability for local government in Devon. All current top tier councils face growing deficits on the Dedicated Schools Grant (DSG) high needs block, with Devon County Council's cumulative DSG deficit standing at £127.2m as at the end of 2024/25. Councils across the country await details of the Government's proposed reforms to the SEND system and DSG funding. We have not attempted to predict or forecast how reforms and changes to funding would impact the position for councils in Devon by April 2028 (when the current statutory override ends). Our analysis assumes that the issue of SEND deficits will be addressed in a way which ensures the viability of other council services is protected as far as possible from financial impact. The size of Devon County Council's SEND deficit means that any alternative assumption would pose fundamental challenges to viability, whatever the structure of unitary local government proposed for Devon.

#### **Housing Revenue Account**

17.10. There are three Councils in Devon that have retained their Council Housing stock. The three Councils have adjoining boundaries and under our base and modified proposals, the functions would move across to two of the proposed Unitary Authorities. In the base proposal, the current East and Mid Devon Housing Revenue Account (HRA) functions would merge within the Devon Coast and Countryside proposal. In the modified proposal, some stock from the current East and Mid Devon would fall within the boundary of an expanded Exeter unitary, with other East and Mid Devon stock falling within the Devon Coast and Countryside unitary. The current number of properties are set out in the table below:

Table 17.3

Council	Number of Properties
East Devon District Council	4,129
Exeter City Council	4,789
Mid Devon District Council	2,975
Total	11,893

- 17.11. It is anticipated that under the modified proposal, approximately 7,000 properties would be consolidated within the Expanded Exeter unitary with the balance (close to 5,000 properties) consolidated within the Devon Coast and Countryside council.
- 17.12. Transitional costs that impact the HRA have been built into the wider financial proposal. The main transitional costs that will impact the HRA are as follows:
  - Redundancy;
  - Programme delivery team;
  - External communication and branding;
  - Workforce onboarding, culture and development;
  - ICT set up and consolidation.
- 17.13. Whilst many of the transition costs will be relatively low, it is anticipated that there is the potential for reasonable redundancy costs and ICT consolidation costs. The funding of the transition costs will be managed in the same manner as the wider transition costs for the proposal.

- 17.14. Reducing from three HRAs to two will enable reasonably significant management savings of around 15-20% within the initial years of the new Councils operation. The three Councils currently spend close to £20m on management and supervision, which means there is an opportunity to deliver around £4 million a year in savings to fund the transitional costs and invest in the existing stock. Longer term savings will be realised from contract and ICT consolidation allowing further investment in stock and the potential to invest in additional social house building.
- 17.15. The Regulator of Social Housing's Rent Standard will continue to apply to individual properties in the new Unitary Authorities and therefore it will be essential that the new Councils ensure that the standards have been followed appropriately in the previous Authorities.
- 17.16. In summary, the re-configuration of existing Housing Revenue Accounts and the reduction of the number of HRAs from three down to two poses opportunities and risks relating to both the base and modified proposals:
  - Managing Transitional costs will be challenging as most capital receipts associated with the HRA are derived from Right to Buy sales which have certain restrictions meaning they cannot be used to fund Transitional Costs. This will mean a greater reliance on revenue reserves:
  - Exeter City Council's HRA has a healthy level of revenue reserves, which can fund transition in the modified proposal for an expanded Exeter unitary. These reserves could subsequently be replenished by the saving arising from a reduction in management costs over the first few years;
  - The other two HRAs have weaker revenue reserves, which will put pressure on the Devon Coast and Countryside HRA when managing transition costs in both the base case and modified proposals.
  - Commissioning a stock condition survey, ensuring there is an asset management plan in
    place for housing and developing a 30-year business plan will be resource intensive and
    costly, but essential to the understanding of the future resource requirements in all
    scenarios.
  - Both HRAs would be of a manageable size to allow for effective management in all
    proposed scenarios. Under our modified proposal, the smaller HRA (Devon Coast and
    Countryside) would be of a similar size to the existing Exeter City Council HRA.

# The Financial Case for four Unitary Councils - costs, savings, and payback period Savings and improved viability

17.17. Across the Devon area (including Plymouth and Torbay), we estimate that our proposals will deliver annual, ongoing efficiency savings of around £50m-£70m per annum for both the base case and modified proposals. These figures are estimates based on detailed modelling and a range of assumptions. Table 17.4 below sets out a summary breakdown of the areas where savings will be achieved; full details of the methodology and assumptions used are set out in the appendix. After implementation costs are paid back, we estimate that the modified proposal would deliver a total cumulative saving of over £400m across a 10-year period following the creation of new Unitary councils.

- 17.18. These savings will improve the viability of local government in Devon, at a point where Devon is likely to see an overall reduction in the level of Government grant and business rates relative to other parts of the country due to the impact of the Fair Funding Review. Tables 17.1 and 17.2 above show how our modified proposal ensures that the financial dividend of Local Government Reorganisation in Devon is distributed more evenly to create four viable unitary councils.
- 17.19. Looking at the extended Plymouth proposal alone, our modelling suggests that the viability of an extended Plymouth council would be improved by over £6m per annum when compared to the base proposal (which maintains Plymouth City Council on its current boundaries). This represents a strong payback for Plymouth in viability terms a £6m annual return on an initial investment of £4.9m.

Table 17.4: estimated savings (base and modified proposal):

Cost / Saving Category	Estimated cost / (saving) (£m) - Base Proposal	Estimated cost / (saving) (£m) - Modified Proposal
Service disagregation costs	9.8	13.5
Service consolidation savings	-28.3	-26.5
Corporate services consolidation savings	-29.9	-20.8
Optimising Senior Leadership	-3.3	-3.3
Optimising costs of democracy	-3.6	-3.3
Property rationalisation	-1.9	-1.5
Service Transformation Savings	-5.9	-11.3
Harmonisation of fees and charges	-1.3	-5.2
TOTAL NET MODELLED ANNUAL SAVING	-64.5	-58.4
Possible "Stretch" saving - right sizing social care	-1.8	-11.3
TOTAL POTENTIAL NET ANNUAL SAVING	-66.4	-69.7

- 17.20. The total estimated annual saving of £64.5m / £58.4m (for the base / modified proposal) has been included in our viability modelling. This is a net figure, with savings from the consolidation of lower tier and corporate services offsetting the additional costs of creating a fourth set of upper tier services. A brief explanation of each category of saving is set out here further detail (including detail on assumptions and methodology used) is set out in the appendix.
- 17.21. **Service disaggregation costs** are the additional fixed costs of setting up a fourth set of upper-tier services an addition to existing costs for management, systems and specialist fixed cost functions in education, social care, highways, public health and other 'top tier' service areas across the two existing unitary councils and Devon County Council. These are estimated to be lower in the base proposal, because the small size of Exeter would drive a lower cost for core services, whereas the much larger size of the Devon Coast and Countryside base case authority would benefit from economies of scale.
- 17.22. **Service consolidation savings** are savings to fixed costs for lower-tier services, delivered by reducing the level of duplication in systems, management costs and specialist functions for planning, waste collection, environmental health, parks, street cleaning and other functions that are currently carried out by 10 different councils (which would reduce to 4 under our

- proposals). As with service disaggregation costs, the base proposal would have lower fixed costs overall due to the much larger size of the Devon Coast and Countryside council and so the savings are greater in this category under the base proposal.
- 17.23. **Corporate service consolidation savings** are savings to fixed costs for corporate services, delivered through a reduction in the number of corporate functions (HR, Finance, Asset Management, ICT etc.) across local government in Devon from 11 to 4. Again, because of economies of scale the savings in this category are greater in the base proposal.
- 17.24. **Optimising senior leadership** savings will be delivered through a reduction in the number of senior leaders across local government in Devon.
- 17.25. Optimising costs of democracy savings relate to a reduction in the number of elected councillors across Devon, and a reduction in the number of local government elections held, because of reducing the number of councils from 11 to 4.
- 17.26. **Property rationalisation** is anticipated as a result of local government re-organisation as in previous local government reorganisation (LGR) exercises elsewhere in the country, there will be buildings that become surplus to requirements because of the merger of councils and a re-distribution of staff work bases. The saving has been estimated based on the costs of main office accommodation only.
- 17.27. **Service transformation savings** relate to further reductions in the cost of delivering frontline services (over and above the service consolidation savings) because of changes to delivery models that deliver efficiencies. There are likely to be many opportunities for service transformation savings; the estimated figures included here relate mainly to anticipated reductions in the cost of waste collection services and social care work because of a more localised approach to service delivery, cutting down on travel time and optimising processes. Savings in this category will be significantly larger in the modified proposal, which will create coherent and balanced service delivery geographies that allow for localised, efficient service delivery models.
- 17.28. Harmonisation of fees and charges will be required where councils merge new authorities will have to set consistent policies and prices for charging for services like licensing, leisure and parking. The experience of previous LGR exercises elsewhere in the country is that harmonising charges results in a more efficient service, with higher levels of overall income. Savings in this category are larger in the modified proposal, primarily due to modelling by Exeter District Council on how charging policies would be harmonised across an Extended Exeter Unitary.

#### 'Stretch' savings - further savings that might be delivered through our proposal

17.29. In addition to the savings categories described above, Table 16.4 also sets out a possible additional saving (of £11.3m in the modified proposal), modelled on a reduction in the cost of social care packages through 'right sized', localised delivery models. This additional saving has not been included in the wider financial modelling of financial viability and payback periods because there are differing views on how local government reorganisation in Devon (and other two-tier areas) might impact on the cost of commissioned social care services.

17.30. Currently, the unit costs of providing social care packages in the County Council area are observably higher than similar unit costs in the Unitary council areas of Torbay and Plymouth. It is arguable that some of this difference relates to the benefits of providing social care through a more localised, responsive delivery model in a smaller geographical area. The £11.3m saving is based on a modest (2-3%) reduction in the cost of commissioned social care packages across the current county area – based on an assumed reduction in unit costs that are currently higher than the unit costs of councils in Devon which operate more localised social care services. However, we feel that this assumed reduction is more uncertain than other assumptions used in our financial modelling, and so we are taking a prudent approach by excluding this saving from our financial viability calculations.

#### The cost of implementing our proposals

17.31. Implementation costs will vary significantly for the different new council areas proposed, and between the base and modified proposals. We have assumed that – for the modified proposal – Plymouth / expanded Plymouth and Torbay / expanded Torbay will be created through a continuing authority model, whereas for both the base proposal and the modified proposal the other two new councils will be created through a more complex transition, with the operation of a shadow authorities and a need to set up new infrastructure, policy frameworks and operating models for each new council. In the base proposal Plymouth and Torbay would remain unchanged, and therefore there would be zero cost of implementation for these areas. The tables below set out a breakdown of estimated implementation costs across Devon for the base and modified proposal, and also a breakdown of implementation costs estimated for the extended Plymouth proposal alone.

Table 17.5: Estimated Devon-wide implementation costs (base proposal):

(Note: this table does not include any costs relating to Torbay or Plymouth as these councils would be unchanged in the base proposal.)

		Estimated cos	st for Base pro	posal - £m		
Cost category	Year <b>- 1</b> (2026/27)	Year <b>0</b> (2027/28)	Year <b>I</b> (2028/29)	Year <b>2</b> (2029/30)	TOTAL	Comments / explanation
Redundancy / workforce exit	0.0	5.0	12.0	5.0	22.0	Workforce exit costs would be significant in the reorganisation of the County Council and 8 district councils.
Programme delivery team	1.6	4.1	0.7	0.5	6.9	Two separate implementation teams and a cross-cutting programme team.
External communication and branding	0.0	0.6	0.6	0.0	1.2	Limited re-branding exercise (signage, website) assumed for two new councils; branding and communications post vesting day within BAU capacity
Workforce onboarding, culture and development	0.0	0.5	0.5	0.0	1.0	Induction and training for transferring staff; culture programmes for new councils.
ICT set up and consolidation	2.0	7.5	3.5	1.0	14.0	Establishing new ICT infrastructure and systems for two new councils; transferring / interfacing data from legacy systems.

Cost category	Year <b>- I</b> (2026/27)	Year <b>0</b> (2027/28)	Year <b>I</b> (2028/29)	Year <b>2</b> (2029/30)	TOTAL	Comments / explanation
New council establishment - policy & process	0.3	0.3	0.3	0.0	0.9	Establishing policy and constitutional frameworks for two new councils.
Shadow authority costs	0.7	1.9	0.0	0.0	2.6	Shadow / parallel running costs for Devon C & C and Exeter unitary councils.
Property rationalisation	0.0	0.5	0.7	0.7	1.9	Cost of adapting and reconfiguring office accommodation to release longer term savings.
Programme contingency	0.0	2.0	1.8	0.7	4.5	Contingency for unanticipated costs
TOTAL	4.2	21.8	20.1	7.9	55.0	

Table 17.6: Estimated Devon-wide implementation costs (modified proposal):

	Es	timated cost				
Cost category	Year <b>- I</b> (2026/27)	Year <b>0</b> (2027/28)	Year <b>I</b> (2028/29)	Year <b>2</b> (2029/30)	TOTAL	Comments / explanation
Redundancy / workforce exit	0.0	5.0	14.0	6.0	25.0	Most redundancy costs would fall to Exeter / 'Devon Coast and Countryside' councils.
Programme delivery team	2.4	5.1	1.7	0.9	10.1	Four separate implementation teams + I Devon wide programme team.
External communication and branding	0.0	1.0	0.6	0.0	1.6	Limited re-branding exercise (signage, website) assumed for all councils; branding and communications post vesting day within BAU capacity
Workforce onboarding, culture and development	0.0	0.8	0.9	0.0	1.7	Induction and training for transferring staff; culture programmes for new councils
ICT set up and consolidation	2.4	8.7	5.0	1.0	17.1	Default approach will be data transfer into existing systems for Plymouth & Torbay, other councils would face far more significant costs
New council establishment - policy & process	0.3	0.3	0.3	0.0	0.9	Continuing authority model for Torbay and Plymouth, costs all relate to Devon C & C and Exeter.
Shadow authority costs	0.7	1.9	0.0	0.0	2.6	Shadow / parallel running costs for Devon C & C and Exeter only
Property rationalisation	0.0	0.9	1.0	0.7	2.6	Mainly Devon C & C and Exeter where more significant rationalisation will take place
Programme contingency	0.0	4.0	3.8	0.7	8.5	Contingency for unanticipated costs
TOTAL	5.8	27.7	27.3	9.3	70.1	

Table 17.7: Estimated implementation costs for extended Plymouth Council modification only:

	Estimated co	ost for Modified	d proposal (Ext	tended Plymou	ith only) -	
Cost category	Year <b>- I</b> (2026/27)	Year <b>0</b> (2027/28)	Year <b>I</b> (2028/29)	Year <b>2</b> (2029/30)	TOTAL	Comments / explanation
Redundancy / workforce exit	0.0	0.0	0.0	0.0	0.0	No Redundancy costs anticipated for Expanded Plymouth implementation – TUPE only applies where there is a transfer of role.
Programme delivery team	0.3	0.5	0.5	0.2	1.5	Expanded Plymouth programme team stood up from 2026 – 2029 (supplemented from BAU capacity).
External communication and branding	0.0	0.1	0.0	0.0	0.1	Limited re-branding exercise (signage, website); branding and communications post vesting day within BAU capacity
Workforce onboarding, culture and development	0.0	0.1	0.1	0.0	0.2	Induction and training for transferring staff; culture programme for new council
ICT set up and consolidation	0.1	0.4	0.5	0.0	1.0	Default approach will be data transfer into existing systems
New council establishment - policy & process	0.0	0.0	0.0	0.0	0.0	Continuing authority model  - new policies and processes would be developed within BAU capacity over time
Shadow authority costs	0.0	0.0	0.0	0.0	0.0	Continuing authority model  – no shadow authority parallel running costs, elections to new council within BAU capacity
Property rationalisation	0.0	0.1	0.0	0.0	0.1	Limited rationalisation for Plymouth, some costs to develop workspace for transferring operational staff.
Programme contingency	0.0	1.0	1.0	0.0	2.0	Contingency for unanticipated costs (e.g. redundancy, data configuration)
TOTAL	0.4	2.2	2.1	0.2	4.9	

#### Financing implementation costs and payback periods

17.32. It is anticipated that implementation costs would be financed from a combination of Capital Receipts Flexibilities and reserves. Colleagues at Exeter City Council have indicated that there is a level of useable capital receipts (together with a receipts pipeline) that would be sufficient to finance the more significant implementation costs arising from the formation of our proposed Exeter and 'Devon Coast and Countryside' based unitaries in both the base and modified proposals. Plymouth City Council has sufficient Usable Capital Receipts in hand to fund the more modest £4.9m implementation costs for the modified proposal for an Extended Plymouth council; similarly, Torbay Council has a reasonable level of useable

- reserves (c. £69m as at the end of 2024/25) which could be utilised to finance the implementation costs for an extended Torbay council.
- 17.33. Our financial modelling has been used to estimate the profile of expenditure and savings over a 10-year period the base and modified proposals across the whole of Devon. The financial profile up to and including Financial Year 2032/33 is set out in table 17.8 below:

Table 17.8

	Year <b>-1</b>	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5
	(2026/27)	(2027/28)	(2028/29)	(2029/30)	(2030/31)	(2031/32)	(2032/33)
Base Case proposal	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)
Transition costs	4.6	22.4	20.1	7.9	0.0	0.0	0.0
Savings in each year	0.0	0.0	-8.4	-33.6	-62.1	-64.5	-64.5
Incremental Net Impact	4.6	22.4	11.7	-25.7	-62.1	-64.5	-64.5
Cumulative Impact	4.6	27.0	38.7	13.1	-49.0	-113.6	-178.1
<b>Modified Proposal</b>	Year -1	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5
Transition costs	5.8	27.7	27.3	9.3	0.0	0.0	0.0
Savings in each year	0.0	0.0	-4.9	-29.7	-54.8	-58.4	-58.4
Incremental Net Impact	5.8	27.7	22.4	-20.4	-54.8	-58.4	-58.4
Cumulative Impact	5.8	33.5	55.9	35.6	-19.2	-77.6	-136.0

17.34. It can be seen that both the base and the modified proposals are estimated to have strong payback periods (paying back all estimated implementation costs by the third year after vesting day). Over a 10-year period following the creation of new councils, our modelling suggests that both proposals would deliver cumulative savings (after the payback of transition costs) of over £400m.

#### Debt and other financial resilience issues

- 17.35. We have commissioned independent consultants LG Improve to provide financial resilience benchmarking information on our base and modified proposals. LG Improve have used published 2024/25 statement of accounts information to estimate the value of assets, liabilities and reserves that proposed unitary councils would inherit (based on shares of population within current / predecessor council areas). This section examines some key financial resilience issues for Devon as a whole, and also for the proposed unitary councils under our base and modified proposals.
- 17.36. Firstly, figures 17.3, 17.4 and 17.5 below set out key financial resilience ratios for the combination of 11 local councils in Devon and compares these to other shire areas that have been invited to submit proposals for re-organisation. Figure 17.3 compares the level of Usable Revenue Reserves as a proportion of Core Spending Power and shows that collectively, councils in Devon have a relatively low level of reserves for their size. Figure 17.4 shows how this position is exacerbated by the impact of Devon County Council's large cumulative DSG deficit, which when set against reserve levels, leaves Devon in the least financially resilient position of all reorganising areas when viewed through this measure. Figure 17.5 examines the relative level of financing requirement (a measure of underlying debt) in Devon which is slightly above the average for all reorganising areas noting that the average position is skewed by exceptionally high levels of debt in two Surrey District Councils.

Figure 17.3: Usable Revenue Reserves as a proportion of Core Spending Power — Devon compared to other re-organising shire areas:

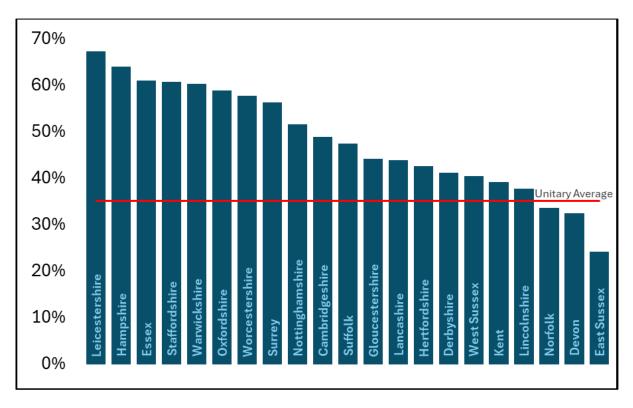


Figure 17.4: Usable Revenue Reserves + cumulative DSG deficit as a proportion of Core Spending Power — Devon compared to other re-organising shire areas:

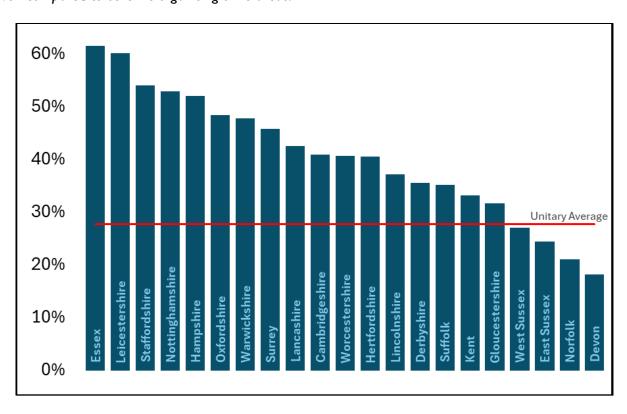
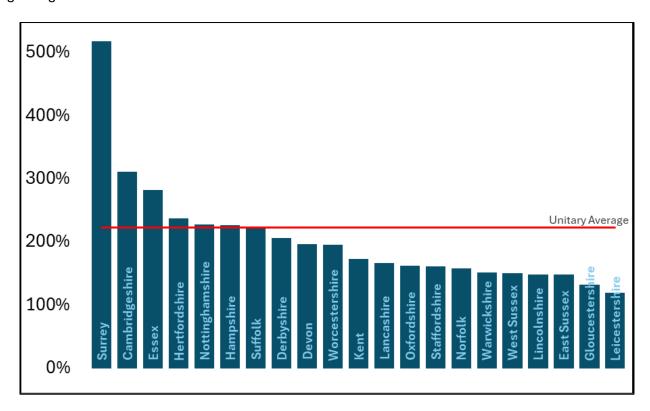


Figure 17.5: Capital Financing Requirement : Core Spending Power ratio — Devon compared to other reorganising shire areas:



- 17.37. The inherited financial resilience position illustrated in figures 17.3-5 above will be a challenge for any new combination of councils in Devon. In particular, figure 17.4 underlines the importance of reducing the level of cumulative DSG deficit for local government in Devon prior to any reorganisation taking effect, in order to launch new councils with a relatively financially sustainable position. The size of Devon County Council's SEND deficit poses a fundamental challenge to viability, whatever the structure of unitary local government proposed for Devon.
- 17.38. Figures 17.6 and 17.7 below explore similar ratios for the base proposal, this time comparing against existing English Unitary councils. Our analysis assumes that the issue of SEND deficits will be addressed or substantially mitigated through Government reform prior to the launch of new councils, so only Usable Revenue Reserves and Capital Financing Requirement ratios are considered here:

Figure 17.6: Usable Revenue Reserves as a proportion of Core Spending Power — Base proposal unitaries compared to existing English Unitary councils:

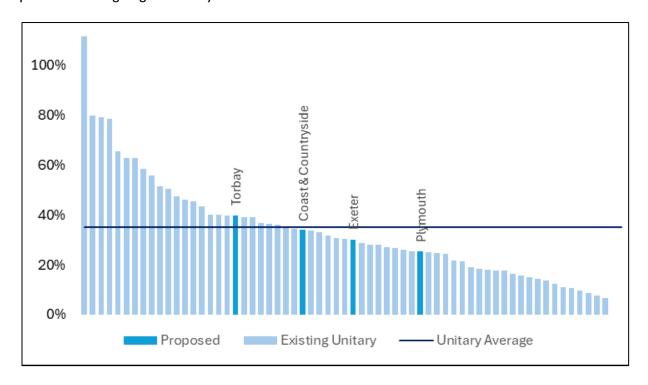
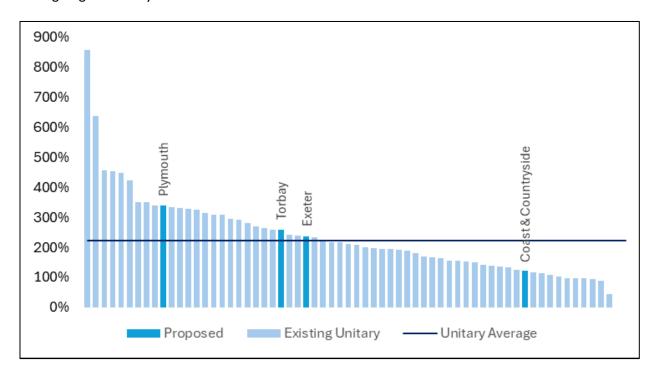


Figure 17.7: Capital Financing Requirement to Core Spending Power ratio — Base proposal unitaries compared to existing English Unitary councils:



Finally, figures 17.8 and 17.9 below explore these ratios for the modified proposal:

Figure 17.8: Usable Revenue Reserves as a proportion of Core Spending Power – Modified proposal unitaries compared to existing English Unitary councils:

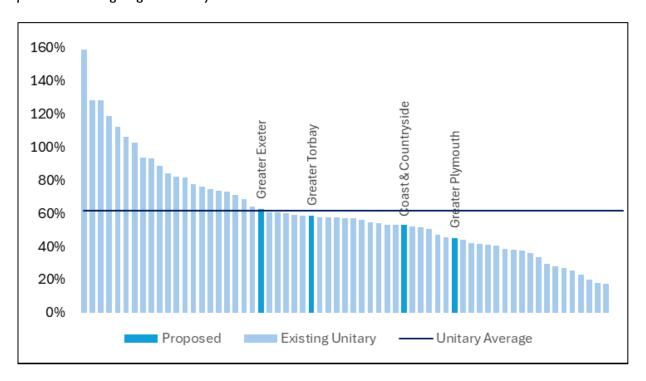
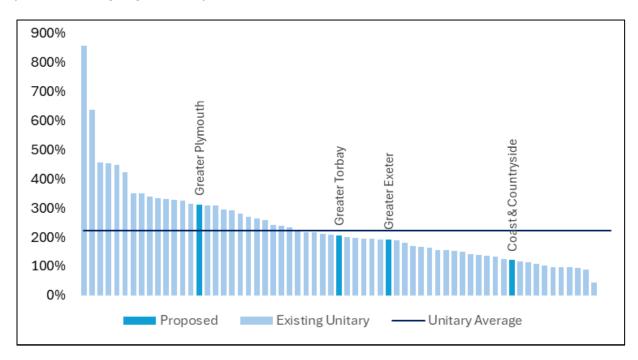


Figure 17.9: Capital Financing Requirement to Core Spending Power ratio — Modified proposal unitaries compared to existing English Unitary councils:



17.39. It can be seen that, as with the comparison of costs and income and overall resources set out above, this analysis of financial resilience shows an improved, more resilient position for councils proposed in our modified proposal. On the key ratios of Usable Revenue Reserves:

Core Spending Power (a measure of relative financial resilience) and Capital Financing

Requirement: Core Spending Power (a measure of relative exposure to long term borrowing need), the modified proposal moves all councils closer to the average position for existing unitaries.

#### **Council Tax Harmonisation**

- 17.40. All eleven councils in Devon currently set different rates of council tax. Any local government reorganisation would require harmonisation so that new unitary councils levy a consistent rate across their area. This has been standard practice in previous reorganisations and should not present significant challenges, provided Government offers continuing and shadow authorities similar flexibility to that granted previously.
- 17.41. Decisions on harmonisation would be taken by democratically elected shadow and continuing authorities in February 2028, assuming new councils commence in April 2028. We are not proposing how this should be done. That will be a matter for future political decision makers based on local circumstances and priorities.
- 17.42. For financial modelling purposes, we assume harmonisation to the average point in the first year of each council. This represents a modest impact of around £2 per month, either upwards or downwards depending on previous district, for a typical Band B Devon household before accounting for any underlying increase councils may choose to apply.

## Building the Foundations for the South West Peninsula Devolution

- 18.1. Plymouth's proposal for four unitary councils provides the optimal foundation for the South West Peninsula Mayoral Strategic Authority. Four balanced constituent councils each serving coherent communities with distinct identities, can work together effectively on regional priorities whilst maintaining genuine local accountability.
- 18.2. Our ambition is for the creation of a South West Peninsula Mayoral Strategic Authority (MSA) to be created at the earliest opportunity so that we can drive change particularly with respect to aligning public services and deploying more effectively devolved funding and powers to the benefit of local people and businesses.
- 18.3. We want to grasp the huge opportunities this will create linked to the ambitious growth agendas of the constituent authorities by requesting Government proceeds with a South West Peninsula Strategic Authority comprising an expanded Plymouth, an expanded Exeter, an expanded Torbay, and a reconfigured Devon, leaving the door open for Cornwall.
- 18.4. A South West Peninsula Mayor promoting at the Council of Nations and Regions how Plymouth, Exeter, Torbay, and Devon could play a greater role in helping to deliver national growth will play a significant part in delivering on the Government's objectives set out in the "Power and Partnership: Foundations for Growth" White Paper. Equally, a South West Peninsula Mayor will promote the interests of the South West, including cross-regional working on strategic issues such as connectivity and infrastructure as well as advocating for more powers, decision-making, and funding to be devolved closer to local communities.
- 18.5. Creating a South West Peninsula Mayoral Strategic Authority presents an opportunity to unify public services across the wider region. The South West is a robust economic area with a Gross Value Added (GVA) of £47.597 million as at 2023. Initially the South West Peninsula Mayoral Strategic Authority would bring enhanced powers and responsibilities for local transport, strategic planning, housing, infrastructure coordination, climate change, skills and driving economic development.

#### **Local Transport**

18.6. A South West Peninsula MSA would become the Local Transport Authority for public transport functions enabling better strategic management of the whole network which is currently spread across 4 authorities with differing priorities. It would also be responsible for public transport provision, including bus and rail services. By developing a single, peninsula-wide Local Transport Plan greater integration and inter-operability is possible, with multi-ticketing and other service enhancements such as introducing electric buses and other decarbonisation measures.

#### **Strategic Planning**

18.7. With the provisions of the Planning and Infrastructure Bill likely to receive Royal Assent in late 2025/early 2026, the South West Peninsula MSA would become responsible for Spatial

- Development Strategies which will set the strategic patterns and scales of development, provide a spatial strategy that guides Local Plans and enables growth, identify strategic locations for development, include policies on the use and development of land that are of strategic importance to the area, and identify key infrastructure requirements to enable the spatial strategy to be implemented (e.g. transport, energy and economic infrastructure).
- 18.8. A South West Peninsula Spatial Development Strategy, digitally enabled with a 30-year time horizon, and linked in with the National Infrastructure Strategy produced by National Infrastructure and Service Transformation Authority, could be prepared over a 24-month period to drive the nationally significant scale of growth envisaged for the area.

#### Housing

- 18.9. The housing crisis facing England is particularly acute in the South West region due to the attractiveness of the area to second homeowners and the impact of tourism. This manifests itself in acute shortages of affordable housing, especially social-rented accommodation, and significant increases in homelessness. The seriousness of this situation is compounded by new affordable housing completions decreasing in the South West by 8.9% since the introduction of the National Planning Policy Framework in 2012 and 2023/2024.
- 18.10. Total supply of new affordable housing in Cornwall, Devon, Plymouth, and Torbay in 2023/24 was 1,487. With high levels of new housing required across the whole area from the Government's Standard Method, the South West Peninsula MSA will be able to take a more strategic approach to housing, working closely with Homes England and its Strategic Partners. The MSA would have control over grant funding for housing deliver and regeneration allowing more effective use of these resources to target local housing needs as set out in the Spatial Development Strategy, including, where appropriate setting up Mayoral Development Corporations and using acquired Compulsory Purchase Order powers.

#### Health and Well-Being

- 18.11. Local government devolution in the UK has increasingly included health-related powers, with the aim of integrating services, addressing health inequalities, and linking health outcomes to economic growth.
- 18.12. Greater local government involvement in health point to several potential benefits:
  - Tackling wider determinants of health Local authorities already hold powers related to areas like housing, education, employment, and transport, which are critical determinants of public health. Devolution allows for a 'health in all policies' approach, integrating health goals into these wider policy areas. Having public health embedded in Plymouth City Council allows for this cross-council approach to tackling core determinants of health and address inequalities that impact upon health.
  - Addressing health inequalities Evidence suggests that enhancing localised control can be more effective at reducing regional health inequalities, particularly by investing in preventative

initiatives and shifting resources towards primary and community care.

- Service integration Closer alignment between local government (which manages social care and public health) and the NHS (which runs clinical services) can lead to a more seamless and integrated experience for patients. Plymouth is already on this journey.
- Innovation Devolution can create "innovation zones" and allow local leaders the freedom to experiment with new models of care that are better suited to their specific population needs. This is already being addressed through the Plymouth approach to our neighbourhood health model and participation in the national Test, Learn, Grow programme.

#### **Infrastructure Coordination**

18.13. There are some fundamental strategic weaknesses in relation to the transport infrastructure of the South West derived in large measure from its peninsula geography: resulting in single points of potential failure in both the Strategic Road Network and the rail network into and out of the region. A Peninsula Strategic Mayoral Authority will be able to raise these strategic connectivity issues with Government and National Infrastructure and Service Transformation Authority NISTA to ensure the objectives of the National Infrastructure Strategy are aligned so that it supports the delivery of growth in the region.

#### Climate Change

18.14. The South West Peninsula MSA will be responsible for developing the Local Environmental Improvement Plan which will support the Government's Environmental Improvement Plan. A South West Peninsula Strategic Mayoral Authority will be able to also use the Spatial Development Strategy to continue to address decarbonisation legislative and local commitments, strengthen resilience, address the decline in biodiversity, and ensure new infrastructure responds to the latest evidence on climate change.

#### **Skills**

- 18.15. The South West Peninsula MSA will be able to coordinate the delivery of skills across a wider-than-local basis through its Local Growth Plan. This will enable more targeted strategic interventions in skills bespoke to each constituent authority. For example in Plymouth, the focus will be on developing defence, marine, green/blue and digital technology, construction, civil engineering, and health care skills reflecting the Government's investments in HMNB Devonport, Derriford Hospital and the designation of Plymouth as the National Centre for Marine autonomy.
- 18.16. The MSA will be able to maximise opportunities while directing interventions and initiatives to areas where the demand is greatest and which ties in with the Government's "Plan for Change" missions.

#### **Driving Economic Development**

18.17. By developing a peninsula-wide Local Growth Plan, the MSA will be able to use its enhanced devolved powers and funding resources to drive growth and innovation, market the region nationally and internationally, tackle known areas of economic inequality, specifically by developing inclusive growth initiatives, and ensure that benefits from major projects such as the defence investments at HMNB Devonport and Derriford Hospital can be felt across the region.

#### **Policing**

- 18.18. The Government has confirmed its commitment to creating Mayors of Strategic Authorities with policing functions across England in this Parliament. The intention to transfer significant functions to these Mayors makes clear that devolution will involve substantive powers, not symbolic arrangements. Strong, coherent unitary authorities position Devon's councils to engage effectively in these discussions. The current two-tier system, with divided responsibilities and unclear accountability, makes it difficult to present a credible case for taking on devolved powers. Four unitary authorities provide the foundation from which Plymouth, Exeter, Torbay and Devon Coast and Countryside can participate as genuine partners in a Strategic Authority, each bringing clear accountability and capacity to deliver.
- 18.19. Alternative models would undermine effective devolution. A single mega-council would replicate problems of remote governance and the district proposal with Exeter submerged would create an unbalanced MSA. The four-unitary model creates the balanced partnership needed for effective regional governance.

#### **Stakeholder Engagement and Support**

#### Our Approach to Engagement: The "Big Community Consultation"

- 19.1. Between 29 May 2025 until 04 August 2025, the Council undertook the "Big Community Consultation" on its proposals for local government reorganisation. Further events and meetings were held with local businesses and public sector partners between 28 August 2025 and 08 October 2025. This consultation was designed to meet the 4 "Gunning Principles" and respond to the requirements of the Government set out in the letter to the Devon authorities dated 15 May 2025, particularly in relation to Criterion 6a and 6b. The Council adopted a multi-channel strategy to reach a wide and diverse audience. This included a dedicated project website, tailored surveys, facilitated conversation events, stakeholder briefings, and a targeted media campaign. The engagement was structured to allow meaningful input before the final business case is submitted to Government.
- 19.2. The full Local Government Reorganisation Engagement Report is shown in the appendices.

#### Application of the "Gunning" Principles

- 19.3. The engagement was carried out in line with the Gunning Principles:
  - It took place at a formative stage, while the proposal was still being developed.
  - Clear and accessible information was provided throughout, including FAQs and updates.
  - Residents had adequate time to respond, with events and surveys running over several weeks.
  - Feedback was conscientiously considered and has directly informed the development of the final proposal.

#### How the engagement was delivered

- 19.4. To ensure that we could reach as many people as possible, we:
  - Held 19 facilitated conversation events across Plymouth and South Hams, attended by 489 people.
  - Two tailored surveys which received 824 responses.
  - The project website attracted over 11,000 unique visitors and 816 subscribers.
  - Launched a social media campaign which generated over 2.1 million impressions and reached more than 100,000 individuals.
  - Distributed posters, flyers and newsletters to community venues, schools, GP surgeries and libraries across both Plymouth and South Hams.
  - Held 17 stakeholder meetings and 1:1 briefings with MPs, universities, emergency services, housing, and business groups.
- 19.5. The engagement process was designed to ensure that Plymouth City Council's proposals for LGR were shaped by the views of residents, stakeholders, and community groups across Plymouth and the 13 South Hams parishes. The approach was inclusive, transparent, and responsive, with a strong emphasis on listening and co-design.

19.6. A full summary of the approach to engagement and feedback, is available in the appendix.

#### **Our Findings**

#### **South Hams residents**

19.7. 489 Residents expressed strong opposition to joining Plymouth City Council, citing concerns about losing rural identity, planning pressures and infrastructure strain. There was high praise for existing local services and a strong desire to retain local decision-making through empowered parish councils. Confusion about current governance structures was common, and many called for better transport, youth services and road maintenance.

#### Plymouth residents

19.8. Feedback was more optimistic, with residents sharing a vision for a greener, safer, and more inclusive city. Key priorities included improved transport, affordable housing, cultural vibrancy, and stronger community involvement. There was a clear desire for more meaningful engagement and trust-building. Young people highlighted the need for youth-led spaces, better mental health support and involvement in city-wide decisions.

#### Similarities across both areas

19.9. Across both areas, there was pride in local identity and a strong emphasis on protecting green spaces. Residents valued responsive governance and called for improved engagement and transparency. Transport, infrastructure and healthcare were common concerns, though South Hams residents focused more on preserving rural character, while Plymouth residents emphasised growth and opportunity.

#### Stakeholder feedback

19.10. Stakeholders broadly welcomed the engagement process and recognised the potential benefits of a more strategic governance model. Whilst there were concerns about representation for rural communities, service equity, financial transparency and planning, there was strong support for ongoing engagement, youth inclusion and protecting the distinct identities of different areas. Feedback from MPs, universities, emergency services and business groups reflected a mix of cautious optimism and calls for clarity on delivery and impact.

### What We Heard from Stakeholders and How it has Informed Our Proposal for the Devon Area

19.11. The main issues raised during the engagement and our response to these comments are shown below:

<u>Governance and representation:</u> The proposal must outline how rural communities will be represented within the expanded authority. This includes exploring models such as preserving parish councils, dedicated rural wards, or advisory panels.

<u>Our response</u>: We will progressively move from informing and consulting towards collaborating and empowering, building community confidence and capacity along the way. Our approach recognises that empowerment looks different in different places within unitary model of Government across England, and it will be consistent with Clause 58 of the English Devolution and Empowerment Bill

currently before Parliament. In adopting a phased approach, and whilst awaiting the detailed regulation (see Clause 58 (3) of the bill we will work flexibly to support locally appropriate neighbourhood governance solutions whilst maintaining consistent standards and values across the enlarged area.

<u>Service equity:</u> The proposal should demonstrate how services will be maintained or improved across all areas, with particular attention to rural needs, transport connectivity, healthcare access, and waste management.

<u>Our response</u>: Our reorganisation proposal extends proven excellence across Devon while ensuring no community experiences reduced service quality. The four-authority model specifically addresses rural needs through dedicated structures that eliminate current fragmentation.

The dedicated 'Devon Coast and Countryside' authority is purpose-designed for dispersed populations through Neighbourhood Area Teams integrating housing, social care, NHS and voluntary services. Plymouth's integrated health and social care model with Livewell Southwest will serve all 300,733 residents of the expanded area, while Torbay's nationally recognised Integrated Care Organisation excellence benefits South Devon's wider geography. Plymouth's Homelessness Recovery Programme, delivering 78 new temporary accommodation units with 95 more in pipeline, extends across the enlarged area. Greater Exeter authority addresses substantial unmet adult social care needs through integrated housing and planning powers. Our unequivocal commitment ensures safeguarding duties and service continuity for vulnerable children and adults throughout transition, with robust oversight mechanisms strengthened across all new unitary structures.

<u>Financial transparency:</u> Concerns regarding council tax harmonisation, funding allocations, and debt inheritance must be addressed clearly and credibly. Residents want to understand how resources will be managed and whether the reorganisation will deliver value for money.

Our response: decisions to set financial plans, budgets and council tax for the extended Plymouth area will be taken in formal committee meetings, open to scrutiny by the public and elected councillors. All financial matters will be subject to external audit and assurance, with value for money assessed annually as is the case currently. We hope and anticipate that decisions on inherited assets, liabilities and debt will follow national guidance and, again, will be reported transparently and subject to public scrutiny and external audit where appropriate.

<u>Planning and development:</u> The proposal must include safeguards against overdevelopment and urban sprawl. It should promote strategic planning that respects local character, protects green spaces, and ensures infrastructure keeps pace with growth to meet the needs of the expanded authority.

Our response: We will commit to the early commencement of a new local Plan for the expanded Plymouth area that will address the planning and development concerns raised. We also commit to an extensive programme of community and stakeholder engagement as part of preparing the new plan.

<u>Community engagement:</u> Ongoing engagement must be built into the governance model. Residents want to be part of the decision-making process, not just consulted at key milestones. Mechanisms for feedback, participation, and accountability should be embedded in the proposal.

<u>Our response</u>: Our proposal embeds ongoing engagement as a structural guarantee through innovative Neighbourhood Networks operating from vesting day. These collaborative forums bring together ward councillors, parish representatives, community organisations, and service partners, providing continuous dialogue rather than episodic consultation.

The 'Test, Learn, Grow' co-design process ensures communities shape their own governance model through extensive listening sessions, pilot experiments, and rigorous evaluation. This iterative approach creates mechanisms for continuous feedback, participation, and accountability embedded throughout the authority's operations, ensuring democratic legitimacy and genuine community ownership.

**Youth inclusion:** The views of young people must be reflected in the final proposal: their priorities for housing, transport, education, and wellbeing are essential to shaping a future-ready city.

Our response: In addition to committing to continued direct engagement with the Youth Council on Local Government Reorganisation and service design issues, our new Community Engagement Framework will ensure the voice of young people is heard. We also commit to holding bespoke sessions with young people on the new Local Plan for the expanded Plymouth.

<u>Digital inclusion:</u> The Council must commit to maintaining non-digital service options and investing in digital literacy and infrastructure. Accessibility must be a core principle of service design.

Our response: The Council has an approach to the service design that includes the principle of designing for digital first as well as providing alternative accessible services for those that are digitally excluded. Accessible services include both phone support and in person, primarily through our network of libraries. For example, we have registered the phone numbers of residents who are digitally excluded, and their calls are prioritised over other customers when they need to call Plymouth City Council. This is coupled with a focus on improving digital inclusion in the city through supporting network providers to deliver infrastructure (IGbps broadband and 4 and 5G mobile services) and helping residents with the skills and providing access to equipment that will allow them to get online. Recent survey results show that only 3% of Plymouth residents never use the internet and a further 2% are insufficiently confident in their use of the internet. We are using these results including both age and geography splits of this data to help us target interventions to help overcome this level of digital exclusion.

#### Learning from Neighbouring Authorities' Engagement

- 19.12Following a review of the published engagement results from neighbouring authorities, several remarkably consistent themes emerge that are worth noting:
  - **Distance and democratic deficit** The most significant pattern is the widespread concern about remoteness from decision-making. Residents repeatedly expressed anxiety that larger or centralised councils would be too distant from their communities, creating what many described as a democratic deficit where local voices go unheard. This was particularly pronounced in areas like North Devon, where people already feel overlooked and cite specific examples of underfunded local services and infrastructure.
  - Place-based identity Across all the engagement processes, people demonstrated a strong
    emotional attachment to their local identity and place, with clear preferences for governance
    structures that enable genuinely local decision-making rather than simply managing services
    from a distance.

- Transparency and participation The desire for transparency, accessible councillors, and early involvement in decisions came through consistently in every authority's consultation work.
- **Practical service concerns** Alongside governance principles, residents highlighted practical concerns about infrastructure, transport connectivity (particularly in rural areas), and environmental protection.
- 19.13It is worth noting that Devon County Council's consultation showed 69% support for their single Devon unitary model despite these concerns about remoteness being clearly articulated. However, this figure should be understood in context, the specific question testing support for the single authority option was inserted into the engagement with only 19 days remaining before close, and received just 432 responses compared to the 7,470 responses gathered during the broader three-month consultation phase. This represents approximately 5.8% of the total engagement response.

#### Implementation Plan

#### **Assumptions**

- Devon local authorities will work together to put into place interim governance and delivery mechanisms that enable joint working.
- This implementation plan outlines the arrangements for the integration of 13 parishes within the Plymouth Authority, the creation of an Exeter Unitary Authority, the continuation of Torbay Council and the creation of a new unitary to cover the Coast and Countryside of Devon.
- In this scenario, Plymouth and Torbay have continuing authority status,
- Exeter City Council and the 'Devon Coast and Countryside' authority are granted new authority status,
- The transition also includes a workstream to support devolution arrangement under the English Devolution and Community Empowerment Bill 2025 and the creation of a Strategic Authority in Devon.

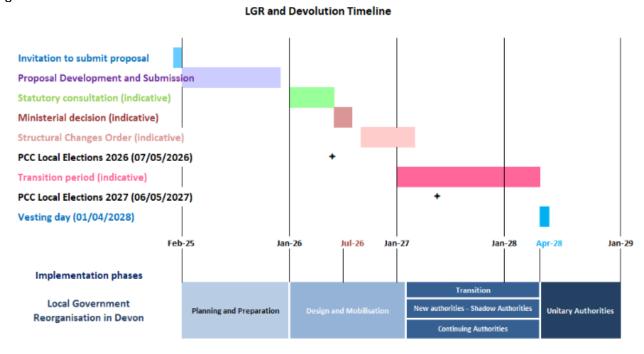
#### Rationale for implementation

- 20.1. The proposal involves the consolidation of 11 existing local authorities (comprising 2 Unitary Authorities, 1 County Council, and 8 District Councils) into 2 new unitary authorities and 2 continuing authorities. This structural reform is designed to reduce institutional complexity, streamline decision-making across the county and unlock future Devolution by central Government.
- 20.2. By simplifying governance structures and rationalising service delivery arrangements, the proposal aims to eliminate friction between tiers of government, improve coordination, and enhance the consistency and accessibility of services. It will also establish clearer lines of democratic accountability by aligning local representation with service responsibility and establish Neighbourhood Networks. The proposal seeks to establish financially sustainable unitary authorities that are better equipped to deliver strategic priorities, respond effectively to local needs and are ready for Devolution.
- 20.3. Ahead of the transition, we will put in place interim governance and delivery mechanisms that enable joint working with our local authority partners. Throughout the transitional period, our focus will be on realising benefits, addressing potential challenges proactively, and keeping disruption to a minimum; ensuring all legal obligations are met. We are dedicated to maintaining seamless service provision in collaboration with neighbouring local authorities, with the overarching aim of achieving meaningful improvements for our communities.

#### LGR Implementation key dates and delivery phases

20.4. The timings provided below, including election dates, reflect those outlined by MHCLG. The impact on Plymouth would have to be confirmed once a decision is made by MHCLG on the proposals.

Figure 20.1



#### Strategic governance and oversight

20.5. This section outlines the governance arrangements for the transition period under local government reorganisation, distinguishing between authorities with continuing status and those designated as new authorities. The dual-pathway approach ensures that both types of authorities meet statutory requirements and transition safely and legally to the new arrangements. The table below sets out the key governance components and how they vary across the two pathways.

Table 20.1

Governance component	Continuing Authorities Plymouth Torbay	New Authorities Exeter 'Devon Coast and Countryside'
Legal status	The current local authority retains existing legal identity and absorbs new areas. The Structural Changes Order can:  • legally expand boundaries, • designate the authority as the continuing authority • transfer assets, liabilities, and staff, • set out transitional governance arrangements (e.g. implementation executive)	<ul> <li>legally define boundaries,</li> <li>transfer assets, liabilities, and staff,</li> <li>and set out transitional governance arrangements (e.g., shadow council)</li> </ul>
Transition governance body	Establishment of an Implementation Executive to oversee the transition.	A Shadow Executive or Joint Committee is established to oversee the transition.

	Existing Chief Executive of the continuing authority to act as programme sponsor.	The programme sponsor is appointed from among senior officers or elected members of predecessor councils.
Decision-making powers	The existing council takes responsibility for transitional governance, overseen by a dedicated Implementation Executive.	The transition body is granted powers via SCO to prepare for vesting day.
Electoral arrangements	Existing councillors to continue in office Elections to take place in May 2027	New elections are required under SCO; transitional arrangements are specified in the SCO.
Staffing and TUPE	TUPE applies to incoming staff; HR harmonisation led by existing HR function.	TUPE applies across all predecessor councils; new HR structures are established.
Service harmonisation	CSC/Education ASC Highways Waste Planning Housing Leisure	CSC/Education ASC Highways Waste Planning Housing Leisure
Assets	Full asset transfer	Full asset transfer
Contracts Branding and identity	Existing branding to be retained and extended.	New branding and identity developed for the new authority.
Monitoring and Evaluation	M&E is embedded within existing performance frameworks.	A new M&E framework developed from scratch, aligned with the SCO and MHCLG expectations.
Risk management	Builds on risk registers and governance assurance of existing council.	A new risk management framework is required, covering all predecessor councils.

#### Implementation Framework for Local Government Reorganisation in Plymouth

#### **Assumptions**

- Plymouth retains continuing authority status.
- This implementation plan covers the arrangements for the integration of 13 parishes within the Plymouth Authority.

#### **Transition in Plymouth**

- 20.6. This implementation framework is underpinned by a strategic case which sets out how the proposed reorganisation of local government in Plymouth will deliver improved outcomes. The programme will deliver a unified governance structure, service delivery arrangements, and local democratic framework across the expanded area.
- 20.7. These outputs are expected to lead to measurable outcomes:

- single council responsible for all services (no service user confusion),
- enhanced local accountability,
- and greater operational efficiency.
- 20.8. In the longer term, the programme aims to achieve a financially sustainable local authority capable of delivering on strategic priorities and responding effectively to local needs across the expanded area. The strategic case is supported by a set of assumptions, including the granting of continuing authority status, Government support, constructive stakeholder engagement and sufficient delivery capacity.

#### Strategic governance and oversight

- 20.9. Overall governance will be established in June 2026 to prepare for the transition phase.
  - **Programme Sponsor:** Leader of the Council
  - Senior Responsible Officer (SRO): Chief Executive
  - Governance Body: Implementation Executive
  - Programme Management Office (PMO): Established to coordinate delivery across workstreams, following best practice set out HM Treasury's Teal Book Guidance on Project Delivery in Government.
  - **Legal Framework:** Transition governed under the Local Government and Public Involvement in Health Act 2007, with oversight from MHCLG. Consideration of the English Devolution and Community Empowerment Bill 2025.

#### Implementation phases and timeline (indicative)

**Table 20.2** 

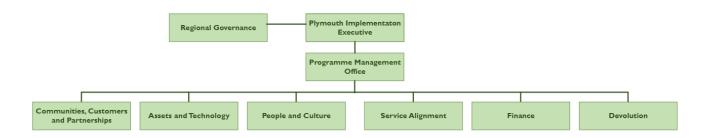
Milestone	Description	Target Date
Proposal submitted to MHCLG	Formal submission of LGR case	28 November 2025
MHCLG consultation	MHCLG Consultation	January 2026 to early May 2026 (indicative times)
MHCLG decision	Decision to implement a proposal communicated to stakeholders	June 2026 (indicative times)
Statutory Change Order and Parliamentary Process	Structural Change Order (SCO) Parliamentary process	Starts after the summer recess in Autumn 2026 for 6 to 9 months (indicative times)
Transition Authority operational	Structural Change Order is in place and outlines arrangements for elections, councillor numbers and governance of the transition are provided in the SCO. This begins the process of transition, where existing councils prepare the transfer of assets, functions and staff but continue to function and deliver services until vesting day.	First trimester of 2027 for at least one year. (indicative times)

Elections	First elections to transition authority	06 May 2027
Local Government Boundary Review	Electoral boundaries review process	This process will take place at a currently indeterminate date after the elections to the transition authority
Vesting Day	New unitary authority goes live	01 April 2028

#### Programme structure and workstreams

Figure 20.2

LGR Implementation Programme Structure and Workstreams



A structured implementation programme is provided as an appendix to this report.

#### **Managing Transition Risks**

- 21.1. We will apply our corporate risk management framework principles and approaches to support the transition from the existing structure of local government in Devon to the creation of the 4 unitary authorities. This approach will allow functional areas of risk (in areas such as SEND, adult social care, children's services, planning, highways etc.) to be planned for leading up to the implementation stage. It also allows for cross-cutting risks to be captured to ensure proper assessment, mitigation, review, and scrutiny.
- 21.2. At this stage we have identified the following key risks:

Table 21.1

Table 21.1		
Risk description	Mitigation	
Delayed decision by the Secretary of State and/or delayed parliamentary approval for the Structural Change Order delays the start of the transition and compresses timescales.	Mobilise the transition programme team and start preparation work as soon as the proposal is submitted. Maintain regular liaison with MHCLG and monitor legislative developments. Build flexibility into programme timelines to manage uncertainty.	
Difficulties collaborating or engaging with other Councils, resulting in poor coordination ahead of vesting day.	Establish a cross-authority LGR Governance Board with agreed terms of reference and clear decision-making process.	
Risk to operational continuity and seamless delivery of services due to disruption in processes, systems, or staff readiness during transition.	Develop detailed operational transition plans for all service areas, including staff training, ICT and data alignment, and harmonisation of service delivery and performance models across legacy authorities. Ensure that each service has effective leadership, statutory systems, and local delivery infrastructure fully in place for vesting day.	
Risk that reorganisation affects service delivery in Adult Social Care, resulting in failure to meet statutory obligations in these critical service areas.	Establish a dedicated transition workstream for Adult Social Care services. Engage early with Livewell Southwest and other partners. Develop detailed operational plans covering staff training, ICT and data alignment, safeguarding protocols, and service delivery models. Harmonise commissioning with neighbouring authorities and align with Integrated Care Boards. Prioritise these services to ensure leadership, statutory systems, and local delivery infrastructure are fully in place for vesting day.	
Risk that reorganisation affects service delivery in children's services, including safeguarding, Children and Adolescent Mental Health Services and Special Educational Needs and Disabilities, resulting in failure to meet statutory obligations in these critical service areas.	Establish a dedicated transition workstream for Children Social Care services and engage early with commissioned and partner providers. Develop detailed operational plans covering staff training, ICT and data alignment, safeguarding protocols, and service models. Harmonise commissioning with neighbouring authorities and align with Integrated Care Boards. Prioritise these services to ensure leadership, statutory systems, and local delivery infrastructure are fully in place for vesting day.	

Complexities in aggregating and disaggregating IT systems and data. Risk of failure or delay in data migration, including data loss and system incompatibility.	Audit ICT systems across critical services and key providers to ensure compatibility, data protection, and continuity. Establish dedicated workstreams with clear plans and contingencies. Prioritise key systems for vesting day, aligning others based on contract timelines. A unified contract register will support this process.
Risk of service continuity issues due to contract termination, novation challenges, or supplier disputes. Some existing contractual arrangements may be difficult to transfer, renegotiate, or exit.	Develop a procurement transition strategy that includes a contract audit, a unified contract register, and early supplier engagement. Plan for novation and continuity clauses in line with the National Procurement Policy Statement. Review existing contracts early to identify long-term commitments and work with providers to ensure flexibility and value for money.
Risk that actual transition costs exceed projections, reducing the savings achieved and impacting the overall financial case.	Close monitoring of transition costs, contingencies have been built into the budget and adjusting plans where necessary to ensure delivery remains within budget.
Failure to realise anticipated savings, resulting in continued demand and budgetary pressures, adversely affecting service delivery.	Prudent and phased approach to delivering efficiencies, supported by robust financial oversight and regular monitoring by the programme team. Tracking of financial benefits and alignment with Medium Term Financial Planning across transition period.
Risk of diminished staff morale due to uncertainty, organisational change, and perceived job insecurity during transition. Risk of loss of key personnel and corporate memory.	Ensure a change-management programme is established. Continue the staff engagement and wellbeing strategy and extend it to new personnel. Provide regular updates on progress during the transition.
Resistance to organisational change, cultural misalignment, and reduced productivity during restructuring.	Develop change-management programme and People Strategy for the new organisation. Conduct early engagement with Trade Unions. Plan for a structured approach to onboarding and induction.
Risk of stakeholder disengagement or opposition during the transition period.	Prepare a transition engagement strategy and plan, tailored to the stakeholders. Continue inclusive engagement that began with our 'Big Conversation' throughout the process, applying the Gunning Principles.

## **Our Asks of Government**

In our Interim Plan, we requested clarification from Government on a number of key issues. These have been revised and updated to reflect the feedback from MHCLG set out in its letter of 15 May 2025, and subsequent updates of guidance on the MHCLG web site. We would welcome the opportunity to discuss this face to face with Government after our submission.

We would like Government to confirm:

- 1. That Plymouth City Council is a "continuing authority" with a modest boundary extension to enable a smooth process for the implementation of unitary government by April 2028. This will minimise the risk to critical top tier services and the cost of implementation as the vast majority of affected staff and functions will already be in place, thereby allowing service continuity to be maintained over this period of reorganisation.
- 2. The transitional flexibilities that have been previously applied regarding council tax capping to facilitate council tax equalisation are able to be applied to support council tax harmonisation in Devon, if required.
- 3. National guidance is provided for the division and re-distribution of balance sheet assets and liabilities arising from the reorganisation of council boundaries and resultant absorption of balances, assets and liabilities from predecessor authorities.
- 4. To what extent any further work is required in the implementation phase of local government reorganisation in relation to the Government's health system reforms insofar as they relate to the creation of the proposed four unitary council's and the devolution plans for a Peninsula Strategic Mayoral Authority.
- 5. That the Structural Changes Order contains all the standard provisions used in other reorganisations including precise ward and parish schedules, clear maps, transfer of property rights, liabilities, and staff, the actual vesting date and any necessary provisions on Section 24 controls and electoral arrangements.
- 6. That standard flexibilities will apply in relation to the use of capital receipts for transformation that will allow the 4 new unitary councils to deliver the transitional arrangements at pace.

## **Conclusion**

- 22.1. Our plan for local government reorganisation for the Devon area is transformative, innovative, growth-orientated, and evidence-led. By moving from an outdated and inefficient two-tier system of local government to a modernised system based on four unitary councils we can deliver a sustainable and more resilient future for the people of Plymouth, Exeter, Torbay, and Devon. Our proposal will minimise disruption to local service delivery during the transition period because our base proposal is centred on two continuing authorities. Our proposals therefore meet criterion one of the White Paper.
  - 22.2. Our base proposals for local government in Devon comply with the Government's criteria to be based on whole district boundaries but we are clear that this is not the optimal future arrangement to achieve the Government's wider objectives set out in its White Paper in the Devon area. To achieve these wider objectives, we consider that modifications to our proposal should be supported by the Secretary of State and be the subject of the statutory consultation.
  - 22.3. Our modified proposal creates four financially viable unitary councils all of sufficient size to withstand financial shocks and which are projected to make savings from the third year. Our proposal therefore meets criterion two of the White Paper.
  - 22.4. Our modified proposal for the Devon area meets criterion three of the White Paper because it creates a coherent geography for service delivery by simplifying access to services for residents and removing administrative duplication, taking account of the community consultations that have been held and providing a foundation to respond to the Government's planned neighbourhood structures. The proposed four modified unitary authorities strike the right balance between sufficient scale to be financially viable but well-related to functional economic geographies to maintain a grip on service delivery.
  - 22.5. Plymouth, Exeter and Torbay have collaborated closely in creating an aligned proposal for a modified four-unitary model in Devon which recognises and responds to issues of community identities as well as reflecting on the ground cultural and historic context. Through data sharing protocols and working on functions of mutual interest we have been able to show in our proposal for Devon how we have met criterion four of the White Paper.
  - 22.6. Our proposal with modifications provides the optimal arrangements to support the Government's objectives in relation to devolution thus meeting criterion five of the White Paper. We have demonstrated that a four-unitary model for Devon is the best structure to accelerate housing delivery, especially in growth-orientated urban based authorities such as Plymouth, Exeter, and Torbay.
  - 22.7. Plymouth, Exeter and Torbay have all undertaken extensive community consultation exercises to engage local communities and businesses. Each authority is responding positively with proposals for stronger community engagement and neighbourhood empowerment arrangements as part of these local government reorganisation proposals, drawing upon these community consultations and therefore meeting criterion six of the White Paper.

22.8. Plymouth has proposed four unitary councils for Devon because we believe this is the only model that serves all of Devon effectively. Our expanded boundary into South Hams is essential to our growth ambitions, but it only makes sense within a wider Devon solution that gives Exeter the governance it needs, maintains Torbay's proven model, and creates purpose-designed rural governance. Our proposal represents a forward-thinking approach that will modernise local government in the Devon area for decades to come ensuring a resilient and sustainable future for the communities and businesses of the area.

# Plymouth City Council's Local Government Reorganisation Final Proposal – Appendices



# **Contents**

**Appendix I – Finance** 

**Appendix 2 – List of Parishes** 

**Appendix 3 – Implementation plan** 

**Appendix 4 – Letters of support** 

Appendix 5 - List of figures and tables

Appendix 6 – List of acronyms

Appendix 7 - Key terms explained

**Appendix 8 – Sources** 

Appendix 9 - Climate Impact Assessment

Appendix 10 - Equality Impact Assessment

# **Appendix I - Finance**

## I. Overview of approach

Our approach to the financial modelling and review of costs, savings and financial viability has been developed by a senior group of cross-authority finance professionals, following a review of various approaches taken in previous or proposed Local Government Re-organisations. We have developed detailed financial models to establish the financial case for reorganisation, and to assess the viability of each proposed new unitary. Transitional and implementation costs have been estimated with reference to the implementation plans set out in Appendix 2, drawing upon evidence from previous Local Government Reorganisations and a review of available models. Corroborating indicators of financial resilience have been reviewed alongside our modelling to provide further analysis of financial sustainability. We have commissioned specialist external input to provide advice and modelling in technical areas. This appendix sets out the methodology used for the core financial modelling work, referencing source data and setting out assumptions and the basis of calculations at each stage.

As a first stage, we have used published financial datasets to collate and analyse baseline costs. Within these baseline calculations, we have differentiated fixed and variable cost elements and used this analysis to estimate likely savings and additional costs from the aggregation and disaggregation of different service areas. We have also used data collected from the 11 current councils across Devon as a baseline to estimate the likely savings from the aggregation of corporate services and rationalisation of senior managers, the rationalisation of accommodation, and a reduction in the number of elections and councillors. Savings from the transformation of service delivery and the harmonisation of income streams have been calculated for some specific areas. This has enabled us to estimate the future running costs of each proposed unitary council (after the delivery of reorganisation and transformation savings, and the application of any ongoing costs of disaggregation).

Section 2 of this Appendix provides further detail on this stage of financial modelling.

Secondly, we have compared the estimated future running cost with modelled revenue streams for each proposed new unitary in order to assess the financial viability of each proposed base and modified unitary. Secondary assessments of viability have been carried out by reviewing comparative resilience and viability indicators for each new council, alongside an initial assessment of likely balance sheet health.

The methodology used to assess viability and financial sustainability is set out in more detail in section 3 of this appendix.

Section 4 below explains how the costs of implementation have been estimated, for each new council area and for Devon-wide co-ordination and governance arrangements. Estimated implementation costs are profiled, alongside estimates of savings, disaggregation costs and revenues, to produce a medium-term financial forecast for each proposed new unitary. Financing options for costs have been considered.

# 2. Transformation and Reorganisation benefits and Disaggregation costs

#### 2.1 Baseline costs

Costs have been estimated and analysed using source data from the 2025/26 Revenue Account (RA) returns from each of the current 11 councils, with some further detail sourced from published financial statements (adjusted to a 2025/26 price base). This source cost data has been supplemented with further information collected through a working group of senior finance leaders from each council, using a 2025/26 price base with a reconciliation back to the published RA data. Data from published 2024/25 statement of accounts and other published sources has also been used to estimate 2025/26 senior management costs and members allowances. The results of this data collection exercise are presented in Annex 1 below, which sets out a baseline cost for each current authority against various categories of cost. Costs for corporate services (charged as overheads to RA lines in accordance with guidance) have been disaggregated by each authority so that the full cost of corporate services can be analysed. The total baseline cost reconciles to each authority's 2025/26 RA return.

All baseline costs analysed in Annex I are generally presented and analysed using the net cost of service calculation prescribed by the RA guidance, aggregating the total cost of services at a level of cost which:

- Includes costs that are funded by government grants, i.e. costs shown are gross of government grant income (with costs funded by Dedicated Schools Grant set out separately).
- Presents (with some exceptions) a net position for other (non-government grant) income streams. Exceptions, where costs are presented gross of nongovernment grant income, are noted in paragraph 2.5 below.

This approach allows a fuller understanding of the costs that would be impacted by Local Government Reorganisation, allowing all taxpayer-funded costs to be analysed. However, we have applied a general assumption that most non-governmental income streams (e.g. fees and charges income, grants and funding provided by other, non-governmental bodies) are either not material or would be impacted in line with costs. For example:

- Client income for social care packages would be distributed to new authorities in line with the net cost of care packages.
- Income from fees and charges will generally be distributed in line with the cost of the service.

• Other income streams are generally considered to be de-minimis for the purposes of this proposal stage.

The exceptions to this general approach for non-government grant income are income received from parking operations (parking charges, permit income and fines), and income received within economic and community development functions (generally for property held for economic development and regeneration purposes, but also including revenue grants). These income streams are material (totalling £65.7m and £59.2m respectively across Devon). The geographical distribution of income streams and behaviour of cost in these areas are likely to vary independently of each other and so have been analysed separately.

All costs shown are revenue costs. At this stage we have not attempted to baseline or analyse Capital Expenditure; although we consider that there would be financial benefits from the aggregation and consolidated management of capital programmes savings are likely to be smaller and difficult to estimate at this stage. Capital financing costs are including in the cost modelling set out in Annex I as disclosed in each Council's 2025/25 RA return.

## 2.2 Estimates of savings and costs – service aggregation and disaggregation

The baseline cost data presented in Annex I has been disaggregated into fixed and variable elements for different service areas. Fixed and variable costs have been estimated with reference to existing council budget data for comparable authorities. We have taken this approach to try to model estimates of savings and costs, but also to ensure that the overall cost of new council structures is forecast effectively, taking into account the fixed costs of different service areas in a new four unitary model of local government, and apportioning the variable cost of operations carefully across new council areas. The methodology set out in this section 2.2 also forms the basis of the financial viability assessment in section 3 below.

Variable costs have been reallocated to proposed new unitary councils for base case and modified proposals based on the following principles:

- Where a whole existing council will be incorporated within a proposed new unitary council, all the variable costs for that council are included within the proposed new unitary. For example, in both the base proposal and modified proposal, the estimated variable costs for Torridge District Council services are included within the cost base for the proposed Devon Coast & Countryside unitary.
- Where an existing council area will be split between two or more proposed unitary councils, the estimated variable costs for that council have been allocated to proposed new unitary councils in proportion to appropriate cost drivers for each constituent geography. Cost drivers have been selected for each category of cost using a balance of accuracy / availability of data and the most appropriate basis for apportioning cost across geographical areas.

The fixed costs of providing services across Devon are likely to change significantly through the creation of four unitary councils to replace the existing eleven Unitary,

District and County Councils. For upper-tier functions, fixed costs are likely to increase with the creation of a fourth set of social care, highways and education functions – requiring additional management structures, systems and specialist functions. For lower tier and corporate functions, fixed costs are likely to reduce through the aggregation of functions – the cost of management structures, systems and specialist functions that are currently duplicated will be reduced.

As noted in paragraph 2.2.1 above, some information (on the cost of elections, accommodation, senior management and member allowances costs) has been collected through a working group of senior finance leaders from each council, using a 2025/26 price base with a reconciliation back to the published RA data. Data from published 2024/25 statement of accounts and other published sources has also been used to estimate 2025/26 senior management costs and members allowances and to ensure a consistent estimate. These categories of cost are shown separately in Annex I and have been analysed separately as detailed in section 2.3 below.

The fixed costs for service delivery and other corporate functions for the new base and modified unitary proposals have been estimated; again, with reference to similar current council fixed cost bases as a guide, using fixed costs in the two current Devon unitaries as a basis for comparative analysis. The following key assumptions have been used:

- For the base case proposal:
  - Plymouth and Torbay councils will be unchanged and so both fixed and variable costs are assumed to be unchanged.
  - The new proposed Exeter unitary is assumed to have a similar fixed cost base to the current Torbay unitary, being of a similar population.
  - The new proposed Devon Coast and Countryside unitary is assumed to have a larger fixed cost base than the current Plymouth unitary authority, reflecting the fact that it is a larger, more dispersed council.
- For the modified case proposal:
  - The proposed expansion to Plymouth Council is modest, representing a marginal 12% expansion of population over a relatively small area. Because we are proposing a continuing authority model for the expanded Plymouth Council, we have assumed that the cost of existing Plymouth City Council management structures, systems and specialist functions will continue into the new council largely unchanged. A very small increase has been included in the modified proposal estimates of the fixed costs of education services, reflecting the need to establish a larger specialist school transport function across a new rural area with different demands for mainstream school transport.
  - The proposed expansion of current Torbay Council boundaries and the proposed expanded Exeter unitary area represent more significant expansions and an increase in fixed costs has been assumed for these modified proposals compared to the base proposal. Under our modified proposal, expanded Exeter, expanded Torbay and expanded Plymouth will have broadly similar populations and so are assumed to have similar fixed cost bases.

• As with the base proposal, the modified proposal for the Devon Coast and Countryside unitary would be the largest unitary council of the four proposed and is significantly more dispersed than the other three urban councils. However, its size would be reduced compared to the base case proposal, and so a more modest fixed cost base is assumed when compared to the base proposal.

Our analysis assumes that some existing shared service arrangements across Devon councils (specifically, Pensions Administration, Internal Audit, Libraries and Trading Standards & Coroners) will continue to operate as shared services. We have not, at this stage, assumed that new shared service arrangements will be created and therefore for all other services, fixed costs have been estimated based an assumption that there will be four separate functions operating across Devon following a transition period. Some areas of cost - for example, Capital Financing and Levies are treated as wholly variable and, at this stage, have been apportioned to new proposed council areas based on population.

It is important to note that, throughout, our estimates of cost are for future 'steady state' unitary councils, after a period of transition and transformation into new council structures is concluded. We acknowledge that new councils that are not continuing authorities will inherit a cost base that is likely to be larger than the estimates set out here. This issue is explored further in section 4 below.

Estimates of changes to fixed costs before and after reorganisation are set out in Tables I and 2 (below and overleaf), for the base case and modified proposals respectively.

Table 1: Estimated fixed service delivery costs before and after reorganisation: base case proposal

	42.7 62.3 140.1	Estimated f		after reorga ise proposal		Total	Difference
		Devon coast & countryside	Exeter	Plymouth	Torbay	estimated future fixed costs	- cost / (saving)
Top tier functions	42.7	21.6	9.5	11.8	9.5	52.5	9.8
Lower tier functions	62.3	11.7	6.9	8.5	6.9	34.0	-28.3
Corporate functions	140.1	38.1	21.6	29.1	21.6	110.2	-29.9
TOTAL	245.I	71.4	38.0	49.3	38.0	196.7	-48.4

Table 2: Estimated fixed service delivery costs before and after reorganisation: modified case proposal

	Total estimated		fixed costs a – modified			Total estimated	Difference
	current fixed costs	Devon coast & countryside	expanded Exeter	expanded Plymouth	expanded Torbay	future fixed costs	- cost / (saving)
Top tier functions	42.7	16.7	13.8	11.9	13.8	56.2	13.5
Lower tier functions	62.3	9.5	8.9	8.5	8.9	35.7	-26.5
Corporate functions	140.1	32.0	29.2	29.1	29.2	119.3	-20.8
TOTAL	245.I	58.2	51.8	49.4	51.8	211.2	-33.9

## 2.3 Property optimisation, democratic costs and optimising leadership

We have estimated savings achievable through the rationalisation of property and the optimisation of democratic and leadership costs separately to the broader estimation of savings and additional costs arising from the wider. The baseline expenditure for the relevant categories of cost has been disaggregated from other corporate / central services costs (as set out in Annex I) to ensure there is no double-counting within wider aggregation savings. For all costs in this section, under the base case costs are assumed to be unchanged for the base proposal for Plymouth and Torbay unitaries.

#### **Property optimisation**

Savings through the rationalisation of office accommodation have been estimated for the proposed Exeter and Devon Coast and Countryside unitaries in both the base and modified proposal – and in the modified proposal for an expanded Torbay council - with reference to actual premises running costs of office accommodation collated through a cross-authority senior finance officer working group. Taking an average cost across similar categories of office sites from the existing office estate cost base, we have estimated the costs of office accommodation for new proposed councils using the following assumptions:

- It is assumed that the cost of office accommodation for the base-case Exeter unitary would be broadly equivalent to the current cost of office accommodation for Torbay Council, a similar-sized unitary.
- It is assumed that office accommodation for the proposed Devon Coast and Countryside unitary would be dispersed for both the base and modified proposals. We have based estimated costs for both the base and modified options on four larger satellite sites.
- For the modified proposal for an expanded Exeter unitary, we have assumed the
  office accommodation cost of the base case proposal, with an additional two
  small satellite sites.
- It is assumed that office accommodation costs for the proposed expanded
   Torbay unitary would be equivalent to those for the current Torbay council, with a further mid-sized satellite site.

It is possible that further property optimisation savings may be achievable through a broader rationalisation of operational property (for example, depot sites and customer service delivery points). However, we are not assuming any further savings beyond the office estate as a result of this exercise.

We do not consider that there are likely to be any significant property optimisation savings falling to the proposed expanded Plymouth Council within our modified proposal, and so for this proposal office accommodation costs for the current Plymouth Council are assumed to be equal to the costs for an expanded Plymouth Council. In line with other corporate services, a marginal increase in variable costs for wider FM services has been assumed in order to account for any increase in satellite customer service point or depot costs.

#### Optimisation of democratic costs

The number of elections held in Devon will reduce in proportion to a reduction in the number of councils in Devon from 11 to 4. Currently, every 4 years there are 15 elections held in Devon – Exeter and Plymouth Councils hold 'elections by thirds' with three elections every four years; all other councils hold one election every four years. We have assumed (under both the base case and modified proposals) that the Exeter based and Plymouth based unitaries will continue with elections by thirds and the other two councils will operate an 'all out' democratic process. The estimated cost of elections has therefore been reduced proportionately through a reduction from 15 elections to 8 elections every four years, with costs allocated to new councils in line with the number of elections assumed for each new council, allowing for different population sizes as a further variable element and fixed management and system costs.

The number of councillors would also reduce with a reduction in the number of councils – there are currently 475 district, county and unitary councillors across the II authorities in Devon. Councillors are paid allowances and expenses, which would reduce in proportion with a reduction to the number of councillors.

Cost estimates of general and special allowances have been calculated by reducing the baseline costs across current devon councils in proportion to the reduced number of councillors. This cost has been apportioned across the base and modified proposed unitaries using the assumed number of councillors set out in the table above. Special allowances are assumed to change in proportion to the number of councillors and so have not been calculated separately to general expenses / allowances.

#### Optimisation of leadership costs

Senior leadership costs will reduce as a result of Local Government Reorganisation in Devon through the elimination of duplication and consolidation of management structures. For the purposes of our analysis, we have defined 'senior leadership' as follows:

- For district councils, the Chief Executive and direct reports to the Chief Executive, plus (if different) the Section 151 Officer and Monitoring Officer.
- For the County Council and Unitary Councils, the Chief Executive, direct reports to the Chief Executive, and the third tier of management; including the Section 151 Officer and Monitoring Officer.

Current senior leadership costs have been collated through a cross-authority senior finance officer working group and cross referenced to published statement of accounts data (adjusted to a 2025/26 price base). Headteachers and other school-based senior leaders have been excluded. These costs are shown separately in Annex I (with other cost categories adjusted to ensure there is no double-counting).

For the Plymouth and Torbay Councils proposed in the base case proposal, senior leadership costs are assumed to be unchanged; we are assuming that (under a continuing authority model) that senior leadership team costs for expanded Plymouth will remain unchanged from the current Plymouth council costs. For other new unitary councils proposed (Exeter Council / expanded Exeter and Devon Coast and Countryside Councils in the base and modified proposals, and for the modified proposal for expanded Torbay) we have assumed that each Council will have a leadership team cost broadly equivalent to the average senior leadership cost for the existing top tier authorities.

Tables 4 and 5 (below and overleaf) set out estimates of the various savings covered in this section.

Table 4: Estimated costs & savings before and after reorganisation (Office accommodation, Democratic costs, Senior leadership): base case proposal

	Total			er reorganis ase proposal		Total estimate	Estimate
	current costs (£m)	Devon Coast & Countryside	Exeter	Plymouth	Torbay	d future costs (£m)	d saving (£m)
Office accommodation	8.4	2.1	1.4	1.6	1.4	6.5	-1.9
Elections	4.0	0.9	0.4	0.5	0.3	2.1	-1.9
Member allowances	5.9	1.9	0.6	1.2	0.5	4.2	-1.7
Senior Leadership	13.0	2.5	2.5	2.2	2.5	9.7	-3.3
TOTAL	31.3	7.4	4.9	5.4	4.7	22.4	-8.9

Table 5: Estimated costs & savings before and after reorganisation (Office accommodation, Democratic costs, Senior leadership): modified proposal

	Total current		osts after i	•	tion (£m)	Total estimate	Estimat ed
	costs (£m)	Devon Coast & Countryside	expanded Exeter	expanded Plymouth	expanded Torbay	d future costs (£m)	saving (£m)
Office accommodation	8.4	2.1	1.6	1.6	1.7	6.9	-1.5
Elections	4.0	0.6	0.6	0.6	0.3	2.2	-1.8
Member allowances	5.9	1.5	0.8	1.3	0.8	4.4	-1.5
Senior Leadership	13.0	2.5	2.5	2.2	2.5	9.7	-3.3
TOTAL	31.3	6.8	5.5	5.7	5.3	23.3	-8.0

## 2.4 Other savings

New unitary councils would have to harmonise fees and charges; the experience of previous reorganisations in other areas is that this results in some additional income. For the base Devon Coast and Countryside proposal, and for the modified proposals for the Devon Coast and Countryside and extended Torbay unitaries, we have assumed a 2% increase in parking revenues, with a separate modelled increase for the modified extended Exeter Unitary developed by finance colleagues at Exeter City Council. A minor increase in fees and charges income is also assumed within cost estimates for regulatory services and leisure services.

Some modest savings arising from economies of scale in procurement and efficiencies for single systems have been assumed to be delivered through the merging of lower tier services in the Devon Coast and Countryside proposals for both options, and in the extended Exeter and extended Torbay options for the modified proposal. A 5% reduction in variable costs has been assumed for planning development, economic and community development, with more modest savings in regulatory services and sports, leisure and open spaces.

Specific savings assumptions have been developed in Waste Collection for the extended Plymouth, extended Exeter and extended Torbay proposals in the

Appendix to Plymouth City Council's Local Government Reorganisation Final Proposal November 2025

modified case in consultation with finance colleagues at Exeter City Council. Comparative analysis of unit costs in this service indicates that there are likely to be cost reduction opportunities arising from reduced travel times and route harmonisation, as well as extended use of recycling technology currently adopted at Exeter City Council across a wider area.

Comparing unit costs for Adult and Children social work safeguarding, assessment and care management activity (excluding care placement costs) between current Devon County Council and current Plymouth City Council costs indicates that there is likely to be a saving in this area falling to the extended Plymouth council, which could be delivered through reduced travel times and other operational efficiencies. We have applied existing Plymouth City Council unit costs to the activity data supplied by Devon County Council for the expanded area, which results in a significant cost saving on current apportioned costs.

In addition to the savings categories described above, Table 6 below also sets out a possible additional saving (of £11.3m in the modified proposal), modelled on a reduction in the cost of social care packages through 'right sized', localised delivery models. This additional saving has not been included in the wider financial modelling of financial viability and payback periods because there are differing views on how Local Government Reorganisation in Devon (and other two-tier areas) might impact on the cost of commissioned social care services.

Currently, the unit costs of providing social care packages in the County Council area are observably higher than similar unit costs in the Unitary council areas of Torbay and Plymouth. It is arguable that some of this difference relates to the benefits of providing social care through a more localised, responsive delivery model in a smaller geographical area. The £11.3m saving is based on a modest (2-3%) reduction in the cost of commissioned social care packages across the current county area – based on an assumed reduction in unit costs that are currently higher than the unit costs of councils in Devon which operate more localised social care services. However, we feel that this assumed reduction is more uncertain than other assumptions used in our financial modelling, and so we are taking a prudent approach by excluding this saving from our financial viability calculations.

# <u>2.5 Summary of transformation and reorganisation benefits and disaggregation</u> costs

Table 6 sets out a summary of disaggregation costs and financial savings for the base and modified proposals calculated using the methodology set out above.

Table 6: Summary of costs and savings – Base and Modified proposals

	Estimated cost / (saving) (£m) - Base Proposal	Estimated cost / (saving) (£m) - Modified Proposal	Description
Service disaggregation costs	9.8	13.5	Additional cost of creating new top tier services
Service consolidation savings	-28.3	-26.5	Savings from the consolidation of lower tier services
Corporate services consolidation savings	-29.9	-20.8	Savings from the consolidation of corporate services
Optimising Senior Leadership	-3.3	-3.3	Reduced costs of senior leadership team
Optimising costs of democracy	-3.6	-3.3	Savings in the cost of elections and councillor allowances / expenses
Property rationalisation	-1.9	-1.5	Savings from the rationalisation of offices
Service transformation savings	-5.9	-11.3	Savings from the transformation of services, i.e waste route optimisation
Harmonisation of fees and			Additional income from the harmonisation of fees and
charges	-1.3	-5.2	charges
TOTAL NET MODELLED ANNUAL SAVING	-64.5	-58.4	

## 3. Financial sustainability and viability

## Estimated costs and income for proposed authorities

Using the estimates of fixed and variable costs developed through the methodology set out in section 2 above, we have modelled a projected cost of services for each Unitary Council proposed. All costs are shown at a 2025/26 price base

Income from Council Tax has been estimated using published 2025/26 taxbase figures, aggregated at parish level to match proposed authority boundaries. For councils where council tax harmonisation will be required, harmonisation to an average rate has been assumed in the first year of new unitary councils.

Settlement Funding Assessment income for the base case and modified proposals has been modelled for all unitaries proposed by specialist advisors Pixel, using their latest modelling of the impact of changes proposed in the government's recent Fair Funding Review 2.0 consultation. Note that this modelling was done in October 2025, before the impact changes to Indices of Multiple Deprivation data and prior to the policy statement.

Table 7 below sets out these estimated costs and income streams.

Table 7: Estimated Costs of proposed Unitary Councils – Base and Modified proposals

	Estimated	costs & incor	ne (£m) - Bas	e Case
	Devon Coast & Countryside	Exeter	Plymouth	Torbay
NET COST OF SERVICES:	751.8	181.7	315.8	185.0
funded by:				
Settlement Funding Assessment	235.4	77.7	164.2	89.3
Council tax	559.9	79.2	147.9	95.9
TOTAL CORE SPENDING POWER FUNDING:	795.3	156.9	312.2	185.2
Viability surplus / (gap) in funding	43.5	- 24.8	- 3.6	0.2
	Estimated co	osts & income	(£m) - Modif	ied Case
	Devon Coast &	Expanded	Expanded	Expanded
	Countracido	Freekon	Dhamanath	T
	Countryside	Exeter	Plymouth	Torbay
NET COST OF SERVICES:		316.4	338.4	276.8
NET COST OF SERVICES: funded by:				
	503.5			
funded by:	<b>503.5</b> 143.9	316.4	338.4	276.8
funded by: Settlement Funding Assessment	503.5 143.9 367.4	<b>316.4</b> 144.0	<b>338.4</b> 163.5	<b>276.8</b> 116.3

## 4. Transition costs and medium-term financial profiles

Transition costs are detailed in the main proposal document, with main assumptions stated there. These have been developed through workshop discussions with the Plymouth City Council LGR team, with reference to learning from previous Local Government Reorganisations. Colleagues at Exeter City Council have provided estimates for the transition costs for the disaggregation of an Exeter-based Unitary from the wider Devon Coast and Countryside Unitary, which are assumed to be similar for both the base case and modified proposals. We have assumed transition costs for the creation of an extended Torbay council in the modified proposal to be approximately double the costs for the creation of an extended Plymouth council, due to a more complex implementation; though under the proposed continuing authority model these costs would remain far lower than transition costs for the other two councils proposed.

Annex 2 sets out how costs and savings are assumed to fall across the implementation period and for the first 10 years of new councils. We have assumed that savings will take 2-3 years to be fully implemented in most cases.

# Annex I - Baseline Costs (£m)

	East Devon	Exeter	Mid Devon	North Devon	South Hams	Teignbridge	Torridge	West Devon	Devon CC	Plymouth	Torbay	TOTAL COST
Education (DSG funded)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	425.I	108.8	66.5	600.3
Other Education	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	82.7	20.3	13.3	116.2
Transport Strategy	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.4	1.4	0.1	3.0
Highways	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	35.0	7.1	7.5	49.6
Traffic Management	0.0	0.0	0.0	-0.1	0.0	0.0	0.0	0.0	0.4	0.5	0.1	0.9
Parking costs	1.9	3.5	0.7	1.3	2.4	2.1	1.1	0.8	5.5	6.4	2.5	28.1
Parking income	-5.6	-10.6	-1.5	-4.0	-4.8	-5.8	-2.4	-1.1	-9.8	-12.2	-8.0	-65.7
Parking Services	-3.7	-7. I	-0.8	-2.8	-2.4	-3.7	-1.3	-0.4	-4.3	-5.8	-5.5	-37.6
Concessionary Fares	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	8.1	4.4	3.6	16.1
Other transport	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	18.2	0.1	0.9	19.3
Children Looked After	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	118.2	59.0	27.2	204.4
Safeguarding Children	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	48.4	12.5	15.0	76.0
Other Children's Social												
Care	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	35.0	12.7	6.4	54.0
Adults Care – 18-64	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	175.1	63.4	30.0	268.6
Adults Care – 65+	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	153.9	48. I	26.8	228.9
Safeguarding Adults	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	40.3	8.5	1.1	49.9
Other Adults Social Care	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	30.9	2.0	9.7	42.6
P. Health children's services	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	16.3	6.7	3.6	26.6
P. Health adults' services	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	19.1	8.6	4.6	32.3
Other Public Health												
services	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.1	2.5	3.0	9.7
Homelessness	1.4	2.5	0.3	-0.4	0.6	1.6	0.5	0.6	1.0	7.0	4.1	19.1
Housing Benefits admin.	0.9	1.0	0.5	0.6	0.6	1.4	0.3	0.4	0.0	1.6	2.0	9.3
Other Gen. Fund housing	0.2	0.5	0.0	-0.1	0.4	0.5	0.3	0.2	0.0	-0.1	0.8	2.7
Libraries & Archives	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	7.8	2.0	0.7	10.5
Culture, Heritage &												
Tourism	0.3	2.6	0.0	0.2	0.0	0.0	0.2	0.0	0.1	4.0	1.5	8.8
Sport, Leisure & Parks	5.4	3.2	1.7	-0.2	0.9	2.9	0.5	0.3	2.1	5.3	0.7	22.9
Cemetery & Crematoria	0.2	0.1	-0.1	-0.2	0.0	0.0	-0.2	0.0	0.0	-1.9	-0.8	-2.9
Trading Standards	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.4	0.3	0.2	2.9
Regulatory services	2.0	0.8	-0.1	-0.3	1.3	2.0	0.6	0.7	0.0	0.4	1.4	8.7

	East	Exeter	Mid	North	South	Teignbridge	Torridge	West	Devon	Plymouth	Torbay	TOTAL
	Devon	0.5	Devon	Devon	Hams		•	Devon	СС	•	-	COST
Community safety	0.6	0.5	0.0	0.1	0.1	0.2	0.3	0.0	0.0	0.7	0.4	2.9
Flood & Coastal Protection	0.3	0.1	0.0	0.2	0.0	0.4	0.0	0.0	0.6	0.1	-0.9	0.7
Street cleansing	1.8	1.7	0.6	0.7	0.9	2.4	1.0	0.6	0.0	4.6	1.9	16.2
Waste Disposal	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	26.5	1.4	6.5	34.5
Waste Coll. & Recycling	6.4	3.9	0.7	0.8	6.2	4.6	1.9	2.8	16.6	12.7	6.0	62.7
Building control	0.2	0.0	0.0	0.0	0.1	-0.4	0.2	0.1	0.0	0.2	0.2	0.7
Planning (dev. control)	1.6	0.5	0.4	0.1	1.7	1.3	0.3	0.7	0.8	1.3	0.3	9.0
Planning policy	0.5	0.2	0.5	0.3	0.0	0.2	0.4	0.0	0.5	0.5	0.2	3.3
Environment & Climate	0.2	0.3	0.3	0.1	0.1	0.1	0.1	0.0	2.6	1.2	0.2	5.2
Economic & Com. Dev. cost	1.0	7.4	1.6	1.9	3.1	0.8	2.1	1.8	8.7	10.8	4.6	43.8
Economic & Com. Dev. inc.	-0.1	-13.9	-1.5	-2.3	-3.5	-0.8	-2.2	-1.4	-6.2	-23.6	-3.7	-59.2
Economic & Community												
Development.	0.8	-6.6	0.1	-0.4	-0.4	0.0	0.0	0.4	2.5	-12.8	1.0	-15.4
Coroners & courts	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.8	0.7	0.4	2.9
Corporate & Democratic	0.4	0.7	1.1	-1.5	0.8	-0.6	0.4	0.5	2.6	3.3	4.4	12.1
Local tax collection	1.4	0.5	0.7	0.7	0.8	0.8	0.7	0.3	0.1	0.4	1.3	7.7
Emergency planning	0.0	0.0	0.1	0.0	0.0	0.1	0.0	0.0	0.3	0.2	0.1	0.9
Other central services	0.0	0.6	0.2	0.0	0.2	0.2	0.1	0.1	-0.7	1.2	0.0	2.0
Non-distributed costs	0.0	1.3	0.7	0.8	0.2	1.6	0.2	0.4	5.5	0.0	1.3	11.9
Finance & Procurement	1.2	1.7	0.7	1.2	0.6	1.4	0.6	0.3	10.2	4.6	3.4	25.8
FM, Property & Accomm'n.	1.1	1.4	1.5	2.1	0.5	0.2	1.0	0.0	0.2	10.4	2.6	21.0
ICT, Change & Cust. Svs.	1.9	4.0	1.1	2.8	1.4	1.7	1.5	1.2	11.8	13.8	1.8	43.1
Legal services	0.4	0.2	0.3	0.3	0.5	0.1	0.3	0.3	3.6	1.4	2.8	10.2
HR & OD	0.4	0.8	0.3	0.5	0.3	0.6	0.4	0.2	6.3	2.3	2.1	14.1
Senior Management	1.1	0.8	0.6	0.8	0.5	0.7	0.4	0.5	2.9	2.2	2.5	13.0
Office Accommodation	0.5	0.7	0.3	0.6	0.2	0.2	0.2	0.3	2.5	1.6	1.4	8.4
Cllr. expenses & allowances	0.5	0.4	0.4	0.3	0.3	0.5	0.3	0.3	1.3	1.2	0.5	5.9
Election costs	0.2	0.4	0.2	0.2	0.2	0.2	0.2	0.2	1.4	0.5	0.3	4.0
Other overheads	1.0	0.8	2.0	10.4	0.1	0.1	0.6	0.1	12.4	1.4	11.5	40.3
Housing Benefits	15.5	28.6	11.2	17.4	10.5	18.0	9.8	6.5	0.0	40.4	35.3	193.2
Levies	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.0	0.6	0.2	2.8
Trading Accounts	-0.5	0.0	0.0	-0.2	0.0	0.0	-0.1	0.0	0.0	-1.5	0.0	-2.4
Capital financing	1.2	5.9	1.1	2.3	1.0	2.0	0.2	1.4	41.3	48.5	20.7	125.6
Interest, investment inc.	-2.2	-1.7	-0.7	-0.4	-1.8	-1.2	-0.7	-2.0	-4.0	-4.8	-14.2	-33.6

	East Devon	Exeter	Mid Devon	North Devon	South Hams	Teignbridge	Torridge	West Devon	Devon CC	Plymouth	Torbay	TOTAL COST
NET COST OF SERVICES	43.1	51.8	25.8	36.8	26.2	40.1	21.3	16.9	1.372.9	517.2	319.1	2,471,1

# Annex 2 - Medium Term Financial Profile (£m)

	Year -1	Year <b>0</b>	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year <b>10</b>
	(2026/27)	(2027/28)	(2028/29)	(2029/30)	(2030/31)	(2031/32)	(2032/33)	(2033/34)	(2034/35)	(2035/36)	(2036/37)	(2037/38)
Base Case proposal	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)
Transition costs	4.6	22.4	20.1	7.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Savings in each year	0.0	0.0	-8.4	-33.6	-62.1	-64.5	-64.5	-64.5	-64.5	-64.5	-64.5	-64.5
Incremental Net Impact	4.6	22.4	11.7	-25.7	-62.1	-64.5	-64.5	-64.5	-64.5	-64.5	-64.5	-64.5
Cumulative Impact	4.6	27.0	38.7	13.1	-49.0	-113.6	-178.1	-242.6	-307.1	-371.7	-436.2	-500.7
<b>Modified Proposal</b>	Year -1	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Transition costs	5.8	27.7	27.3	9.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Savings in each year	0.0	0.0	-4.9	-29.7	-54.8	-58.4	-58.4	-58.4	-58.4	-58.4	-58.4	-58.4
Incremental Net Impact	5.8	27.7	22.4	-20.4	-54.8	-58.4	-58.4	-58.4	-58.4	-58.4	-58.4	-58.4
Cumulative Impact	5.8	33.5	55.9	35.6	-19.2	-77.6	-136.0	-194.4	-252.8	-311.2	-369.6	-428.0

# **Appendix 2 – List of Parishes**

## Parishes (extended Exeter)

Ashcombe Crediton Hamlets Otterton
Aylesbeare Dawlish Town Powderham
Bicton Dunchideock Poltimore
Brampford Speke East Budleigh Rewe
Broad Clyst Exminster Rockbeare

Budleigh Salterton Exmouth Shillingford St. George

Cheriton Bishop Farringdon Sowton Chudleigh Town Hittisleigh **Starcross** Clyst Honiton Holcombe Burnell Stoke Canon Clyst Hydon Huxham Tedburn St. Mary Clyst St Lawrence lde Upton Pyne Clyst St. George Kenn West Hill Clyst St. Mary Kenton Whimple Colaton Raleigh Lympstone Whitestone Colebrooke Mamhead Woodbury

Cranbrook Newton St. Cyres

Crediton Town Nether Exe

#### Parishes (extended Torbay)

Abbotskerswell Haccombe with Marldon

Bishopsteignton Combe Newton Abbot

Brixham – (Existing Ideford Ogwell Area) Ipplepen Shaldon

Broadhempston Kingskerswell Stoke Gabriel
Coffinswell Kingsteignton Stokeinteignhead
Denbury and Torbryan Kingswear Teigngrace
Littlehempston Teignmouth

#### Parishes (extended Plymouth)

Bickleigh Holbeton Ugborough
Brixton Ivybridge Yealmpton
Cornwood Newton and Noss Wembury

Ermington Shaugh Prior Harford Sparkwell

# **Appendix 3- Implementation plan**

Continuing Authority Implementation Plan	Timeline										, ,			, ,			,	,												
Key Milestones	200	125	120	120	10 Tab	late.	150	124726	ato .	/ do / de	0 /350	-0.750	100	2 /2	1822	100	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	100	120	NET .	100	10.70	OFT.	aga .	2	No.Th	18/2	ATT .	2 /2	120
Phase 1 - Programme planning and pre-requisite activities	0"	20.1	0"	( 10.	QUT .	( etc. )	par .	(A)	W (	W / W	- ( a)·	0-	( 4	( *	(40)	4, 4	- ( a)	- 4	( 4		age /	· /	N. C	~ /	- V	W /	M.	PN (	4. / 1/2	( W
Submission of formal unitary proposal Statutory consultation by Government		28-Nov-25																												
Ministers' decision to implement a proposal  Possibility of the Minister instructing LGBE to deliver a structural review of Devon electoral				1		<u> </u>		$\vdash$	June 2026 (in	dicative)		1	+-+		+		-		-								-			-
boundaries Plymouth City Council 2026 Elections																														
Phase 2- Likely start of implementation programme, upon government decision																														
Parliamentary Approval for Structural Changes Order to expand boundary (Date TBC)  Possibility of the Minister instructing LGBE to deliver a structural review of Devon electoral																														
boundaries																														
Phase 3 - Implementation Executive - Transition period begins May 2027 Elections * TBC by MHCLG after submission (Plymouth 1/3, South Hams All out)																	06-Ma	r-25												
Budget setting for the existing authority on the new boundary for 2028/29  Phase 4 - Vesting day - Transition is complete and services operate within extended area.																										28-Feb-25		01-Apr-25		
Confirmation or extension of the boundary by LGBCE (Date unknown)  Completion of boundary review by LGBCE (Date unknown)																											-			₽
										/ /	/ /			/ /			/ /												//	
Workstream - Programme Management and Governance	25	15	130	5726	1025	1826	320	1370	250	/so / ii	b /25	0.25	13 /	\$ 2	12	100		10	12	12	/sa	100	122	120	/ab /		A. D.	4.78	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	100
Internal programme support (Legal, HR and financial) MHCLG Agreement / Approval for Continuing Authority	· 6-	/ = ,	/ %		/ 00	/ 4 ,	- W .			10 / 60	( 00	6	/ # / G	- ( 3	/ 🐷 ,	4 / 5	2 / 4	1 10		/ - /	· w /	0"		· · · /	VID (	Q0 /	47	8X /	ek / 10*	/ 10
Governance established (PMO/Reporting/RAIDD/Planning)												+							+								-			-
Detailed transition implementation plan agreed and shared with MHCLG Alignment of existing change activities across councils																														
Augment or existing transper activities across countris.  Council board to oversee the programme in place  Delivery of safe & legal May 2027*elections for the existing councils																														
Delivery of safe & legal May 2027*elections for the existing councils  Delivery of safe & legal May 2027* elections for the Unitary Council						1						1			<del>                                     </del>				1			$ \mp$	-		$ \mp$	$-\Gamma$	-			_
Boundary Commission Review* (TBC - anticipated to start date after the May Election)																														
Legal policy and processes in place for the expanded boundary - application of Plymouth City Council policies to the 13 areas and communication of the changes involved to residents							1					1			1				1											
Preparation of Day 1 Operation & Service Plans, including staff training and communication of																														
changes created Programme closure and handover to transformation																														
Monitoring and evaluation Benefit realisation						1							$\vdash$		+															
										/ .	/ /			/ /			/ /	/ /						/					/ /	$\overline{}$
Workstream - Community, Customer and Partnerships	13	130	15	120	130	1876	250	1340	130	1/30 /2	0 / 30	1250	13 /	10 2	/nd	10 /	20 /2	1 2	10	12	50	20	120	120	1	13	10	220	1 to 1 to 1	130
Development of Neighbourhood Networks Operating Model with Communities (Towns/Parish	0	/ 40	00	IN.	/ 💯	( N	929		111.	107. / 57.0	- 1	0	/ No. / Og	1 185	/ 💯	W / -	ar / Way	/ 107	1 113	( 300	<i>a</i> (	~ /	410	Se (	THE CONTRACTOR	W /	****	all /	elli Juli	,un
and Community Reps) Ongoing engagement with residents and stakeholders												_																		
Expand current access arrangements to cover expanded area																														
Neighbourhood Networks operational			<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	-		$\rightarrow$			L, L,				/			-	_	-	-	_	-		_			<u></u>
Workstream - Assets Optimisation (Technology and Property)	8025	402	12	Jan to	4026	Marto .	SER TO	14 EP 26	unto ,	Justo Justi	io (septio	0026	Jude de	to Jan 2	1802T	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	agin Japan	WANT .	J12	LANGT ,	(10 <sup>23</sup> )	S0.00	MOLI .	Med 1	Sent /	185TD /	11.8°.15	SERTE /	sterit series	W125
Baseline property plan for expanded area, map out what property to onboard Identify business critical data and systems from 13 areas and create transition plan.																														=
Prepare the onboard new staff																														
Implement transition plan for business critical data and systems from predecessor councils																														
Integrate capital invesment programme for 13 areas Use existing data management policy and processes and communicate to staff																														
Use existing security protocols and policies (and communicate to staff)				<u> </u>		L_,	,	ارسا			, ــــــــــــــــــــــــــــــــــــ	١		, L	L.,		_,	, .	<u> </u>							t				<b>上</b>
Workstream - People and Culture								/.		///	/ /		///	/ /			/ /												/. /	
	0,20	water .	de p	18176	4026	Harth	150 E	Marito	WITE !	Justo Just	6 /40 <sup>26</sup>	00.750	/ 400 / d	15 May 1	1802T	15 / E	gal gari	WAY .	Will .	June 2	ag I	00 <sup>20</sup>	MOPT	OK. II	Marito /	(85TB)	HOLES /	ME TO	Harita Linita	WITE
Communication Strategy and Plan agreed for all staff HR Transition Management Plan agreed for new staff																														-
Existing People and Culture Model shared with new staff																														
External and Internal Communications delivered Develop and Deliver Staff Engagement Plan											-	+							+							-				-
TUPE transfer of new staff to existing Council Trade Union Engagement for new staff including TUPE arrangements																														
Closure of the workstream and handover as BAU																														
Staff Terms and Conditions and Job Descriptions updated and aligned to existing authority Policy and Process							1					1			1				1											
Workstream - Service Alignment and Improvement	15	10	1/10	/4	150	150	150	1/20	1	/ /	6 /50	150	/2 /	40 /	/_	10 1	a /2	/2	/.	/_	/_	10	1	1	/*	/*	100	100	10 /2	/_
Alignment of service requirements	000	Alda,	ORT.	180°F	200	s Harr	1 SE	a flat	/ Harris	Julia Sulli		1 850	/ Mgs. / St	1872	2000	/ 35° / -	.de / .j.mi	Mary.	July .	1 36	/ del	See /	Mar.	Copy 1	1877	Sept /	State 1	SE /	stat library	udiz
New Functional operating Models and Services aligned																														
Service Policy, Process and Procedures Prioritised and updated SLAs and Performance Metrics aligned		1		1		1	-				-	1		_	1													+	-	<del></del>
Revised Membership of Partnership Boards (new area representation on PBs)																														
Service Continuity across predecessor Council Boundaries ensured (either side of vesting day)												1																		
External Agencies and Statutory Bodies Notified	_	_	_	<del>-</del>	_	<del></del>	_	-			<del></del>	<del></del>	-		<del></del>	-	$\overline{}$			-	_	/	_	_	/	-	-	_	/ /	-
Workstream - Finance	250	15	100	120	UD26	Marto	150	Marito .	wints .	/ str / str		2.75°	1 300 / 0	20 / 20	402	15 / S	52 J. 357	Sent S	130	15g27	(80 <sup>2</sup> )	1 Page 1	NOTE .	CKEIT .	ATTE !	185TD /	Mar. B	NET /	sterrito unito	1125
Budget Baseline Defined Implementation budget prepared and in place for 2027/28				l T				LΤ					F F																	
Agree responsibilities for legacy financial statements with new authorities						_													_											
Agree responsibility for Peninsula Pensions, Pension Fund Accountable Body and Devon Audit																						T			T					1
Partnership Spending protocol and governance for all authorities in place and monitored																														
Internal Audit Plan, Audit Charter and Risk Strategy reviewed and in place Income / payment arragements transition and communication.		1		1		1	-				-	1																+	-	<del></del>
Consolidation of Grants, fees and charges, and approach to Devolved Funding agreed																														
Council tax (equalisation plus Additional Notional Amounts through MHCLG, collection scheme and rates agreed).  Consult on and introduce a new Council Tax Support Policy.						<u> </u>	<u> </u>	L				<u> </u>			<u></u>															
Consult on and introduce a new Council Tax Support Policy																														Ε-
Buriners rates collection scheme and billion arread																														
Business rates collection scheme and billing agreed  Consult on business rates		1	1	1			1					1			1															
Business rates collection scheme and billing agreed Consult on business rates Financial Strategy and budget for 2028/29 agreed (Incl. aligned capital programmes, Fees and Financial Strategy and budget for 2028/29 agreed (Incl. aligned capital programmes, Fees and																		_												<del></del>
Business rates collection scheme and billing agreed Consult on business rates Financial Strategy and budget for 2028/29 agreed (incl. aligned capital programmes, Fees and Charges) Write new Treasury Management, Capital and Investment Strategies																		_				_					_			_
Basiness rates collection scheme and billing agreed Constitut on business trates in Financial Strategy and budget for 2022/73 agreed (incl. aligned capital programmes, Fees and Financial Strategy and budget for 2022/73 agreed (incl. aligned capital programmes, Fees and Witten for Theraulty Menagement, Capital and Investment Strategies Easisting contracts reviewed and requirement moving forward determined Transfer of company holdings from South Hams to Phymochic Councils																														
Boiless risk collection scheme and billing spreed Ground Publisher and Scheme and billing spreed Ground Publisher and Scheme and billing spreed Ground Scheme and Scheme and Scheme and Scheme and Scheme and Charges) Ground Scheme and Scheme and Scheme and Scheme and Scheme and Scheme Ground Scheme and Scheme and Scheme and Scheme and Scheme Ground Scheme and Scheme and Scheme and Scheme Ground Scheme and Scheme and Scheme Ground Sche																														
Business rates collection scheme and billing agreed Consult on business pages for 2028/29 agreed (incl. aligned capital programmes, Fees and Charless Teams and budget for 2028/29 agreed (incl. aligned capital programmes, Fees and Charless Teams and Charless and Charless and Charless and Charless and Charless and Charless and Charless and Charless and Charless and Charless and Charless and Easting contracts reviewed and requirement moving forward determined Transfer of company holdings from South Havis De Phymototic Charless (Charless and Charless and																														

# **Appendix 4 - Letters of support**



Helen Wylde-Archibald

Chief Executive Officer

Plymouth Chamber of Commerce

24th October 2025

**Tudor Evans OBE** 

Leader, Plymouth City Council

#### **RE: Local Government Reorganisation in Devon**

Dear Tudor,

I am writing to you as the Chief Executive Officer of the Plymouth Chamber of Commerce. Plymouth Chamber is a founder member of Devon Chamber and has been supporting the Plymouth's maritime city's businesses for more than 200 years having been founded in 1813. We have over 800 members and we have our own programme of events, attended by over 40,000 people last year. We run various business support programmes and initiatives, and our strategic priorities are people, planet, and purpose: comprising inclusivity, working towards net zero and doing business that has positive social impact, creates employment and sustainable growth.

Plymouth Chamber has been briefed on regular occasions by your officers and so we are aware of the issues and the options for Devon.

We support the government's proposal to move to a simpler and more efficient unitary structure of local government for Devon which we believe will benefit businesses across the whole of Devon.

Plymouth Chamber of Commerce supports the proposal by Plymouth City Council for four unitary councils in Devon to replace the current two-tier system. We also support the proposed modest extension of the city boundary into the wider travel to work area which we think will enable a more strategic approach to future growth and a more consistent offer to businesses in the area.

#### **Devon Chamber**

Unit 5, Derriford Park, Brest Road, Derriford, Plymouth, PL6 50Z 01752 220471 • reception@devonchamber.co.uk • www.devonchamber.co.uk Company No. 617795 . Limited by guarantee . Registered in England and Wales











We also believe that it is important that any proposals for local government reorganisation reinforce the opportunities for growth linked to the recent announcements of the Defence Deal for the city, its identification as a national centre for Marine Autonomy, and the need to deliver significant numbers of new homes for all the workers that are projected to be needed for these endeavours.

We are aware of other proposals for the area of Devon and so look forward to further engagement with you in the future when the government undertakes its statutory consultation.

Your sincerely,

Helen Wylde-Archibald

Helen Wylde-Archibald

**Chief Executive Officer** 

**Plymouth Chamber of Commerce** 

CC Richard Steven - Chair Of Plymouth & Devon Chambers Of Commerce

**Devon Chamber** 

Unit 5, Derriford Park, Brest Road, Derriford, Plymouth, PL6 5QZ 01752 220471 • reception@devonchamber.co.uk • www.devonchamber.co.uk Company No. 617795 . Limited by guarantee . Registered in England and Wales















Tudor Evans OBE Leader, Plymouth City Council

30 October 2025

Dear Tudor,

#### **Local Government Reorganisation in Devon**

I am writing to you to back proposals for an expanded Plymouth, an expanded Torbay, a large unitary Exeter and surrounding areas council and the creation of a new Coast and Countryside Devon unitary council.

I have long championed the South West getting our fair share and I believe the current set up of small unitaries alongside district and county council means our voice is diluted, services are replicated and there is not the efficiency of delivery of local services necessary to provide taxpayers with value for money and for councils to have a clear focus on growth.

I back proposals set out in the Government's white paper on English devolution. I am aware now that the people of Plymouth have, again, rejected proposals for an expensive and pointless city mayor, we need to now motor with local government reorganisation as a necessary step towards proper devolution of powers and funding to the far south west. I continue to back a Devon and Cornwall option for that devolution, but want to see Devon proceed at pace. To do that, I believe we need to settle LGR swiftly.

The proposals for a larger Plymouth, a larger Torbay, a new Exeter and district unitary alongside a unitary Devon coast and country authority is the best option in my view. This not only provides a strong basis for the urban areas to accelerate their complimentary regeneration agendas, but would make provision for a strongly rural-focussed authority that can respond more effectively in delivering services to dispersed communities. I will advocate for this with my Ministerial colleagues.

In the case of the "expanded Plymouth" part of your proposal, I believe this will ensure that local people reap the benefits to the city arising from the once-in-a-generation opportunities from the defence deal, the national centre for marine autonomy designation, and from the new town announcement. This will also provide Plymouth with a strong voice as and when the Peninsula Mayoral Strategic Authority is taken forward.

In my view the proposal for four unitary councils in Devon, with an expanded Plymouth area covering the 13 parishes immediately surrounding the city, which was the subject of your "Big Community Conversation", is both bold and transformational.

When the Secretary of State for Housing Communities and Local Government publishes their statutory consultation sometime during 2026, I would appreciate further briefings on the next steps the City Council proposes to take with its reorganisation proposals.

Best wishes,

Luke Pollard MP

luke

Labour and Co-operative MP for Plymouth Sutton and Devonport



# Fred Thomas MP Member of Parliament for Plymouth Moor View

Councillor Tudor Evans OBE Leader, Plymouth City Council

23 October 2025

Dear Tudor,

#### LOCAL GOVERNMENT REORGANISATION IN DEVON

As you know, I support the Government's proposals, set out in its White Paper of December 2024, to create unitary local government across the whole of England.

I also support the aim of having these unitary authorities combine into Mayoral Strategic Authorities.

This vision was laid out clearly in the Labour Party manifesto that I and hundreds of other MPs were elected on last year.

I'm writing to confirm that I support your proposal for the creation of four unitary councils in Devon to replace the current county council and eight district councils.

I also support your proposal for a modest boundary extension of the Plymouth City Council area into the South Hams.

I wish you all the best on your local government proposal. Please continue to keep me updated on future progress.

Best wishes,

**Fred Thomas MP** 

Fred Thomas

Labour Member of Parliament for Plymouth Moor View



22 October 2025

Tudor Evans OBE Plymouth City Council

Christopher Stephens
Chair of Plymouth Regeneration Forum
c/o womble Bond Dickinson (UK) LLP
Ballard House
West Hoe Road
Plymouth
PL1 3AE

Dear Tudor

#### **Local Government Reorganisation in Devon**

I am writing to you as the Chair of the Plymouth Regeneration Forum.

The Plymouth Regeneration Forum was set up some years ago to engage with key investors, landowners, and other development stakeholders in the city. The Forum is a chance to discuss relevant planning issues affecting the city and to act as an opportunity for members to be kept informed of the work that the City Council is doing as well as hearing from the development industry about issues that are of concern to them. The Forum is managed in partnership with Womble Bond Dickinson.

We have had presentations at the Plymouth Regeneration Forum from City Council officers on progress with local government reorganisation during 2025. At the 4th of September meeting, there was an interactive session where participants were asked to respond to a series of questions regarding Plymouth's proposals for local government reorganisation.

In response to the question: What opportunities do you see in Plymouth City Council's proposal for an expanded authority?, participants highlighted the following:

- Stronger local voice recognised by the government by meeting criteria of the government thus funding.
- Cost savings.
- An opportunity to clear out "dead wood".
- Better connectivity via transport to the city to help with the job growth.
- A stronger collective voice to represent the area nationally.
- To look at transport efficiencies more coherently.
- Clarity and confidence among investors.

Womble Bond Dickinson (UK) LLP is a limited liability partnership registered in England and Wales under number OC317661. VAT registration number is GB123393627. Registered office: 4 More London Riverside, London, SE1 2AU, where a list of members' names is open to inspection. We use the term partner to refer to a member of the LLP, or an employee or consultant who is of equivalent standing. Womble Bond Dickinson (UK) LLP is authorised and regulated by the Solicitors Regulation Authority (SRA number 449247).

Womble Bond Dickinson (UK) LLP is a member of Womble Bond Dickinson (International) Limited, which consists of independent and autonomous law firms providing services in the US, the UK, and elsewhere around the world. Each Womble Bond Dickinson entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Womble Bond Dickinson entity. Womble Bond Dickinson (International) Limited does not practise law. Please see www.womblebonddickinson.com/legal notices for further details.

- Ability to plan infrastructure and provide greater certainty enabling business to make better medium and long term investment plans.
- Potential economies of scale across the various organisations.
- Economies of scale.
- Better ways to manage the travel to work area.
- Pulled funding resources. Strategic improvements to infrastructure.
- Hopefully more consistency in terms of development throughout the expanded authority.
- Access to government funding.
- Reducing costs of delivering services across the area by avoiding duplication.
- Greater voice for Plymouth which means more investment for more affordable homes/creation new jobs/improved local services.
- Consistent approach to development management and planning but needs Local Plan to evolve.
- Opportunities to improve public transport across the areas where Plymouth would expand to, and across the region.
- United consistency across the area.
- Opportunities to combine budgets and overheads to create a more efficient system.
- More cohesive approach to housing and infrastructure delivery across the expanded local authority but the local authority needs to be adequately staffed and resourced.

In response to the question: What concerns do you have about Plymouth City Council's proposal for an expanded local authority?, participants commented:

- Distraction from real services in the interim.
- Whilst the change happens there could be a vacuums of decisions.
- The encouragement for 'local spending' within the local economy will have a wider catchment area.
- Need to deliver well across many areas, more challenging for SMEs.
- Difficulties in aligning agendas across formerly separate authorities. Will need strong common purpose.
- Ability to knit competing interests constructively. Difficulty in achieving growth agenda as most settlements will not be suitable except Ivybridge and Sherford.
- Plymouth's previous performance hasn't been great so expanding this leadership could make the whole region fail further.
- Spread too thinly at inception.
- If it doesn't bring in more resources than there's more pressure on existing.
- Time lag for implementation and uncertainty during that period.

AC\_218576543\_1 2

- Lack of resourcing.
- Direction of travel to a situation where funding decision at mayoral level are not as local.
- More red tape stifling growth with added wider arguments slowing potential investment and growth.
- Pressure on services and cost due to geography.
- Delay in implementation.
- Difficulty in aligning agendas.
- Increased council tax for better service attracting skills to the region for new jobs.
- No improvement in service delivery due to expanded area.
- Decision making on matters such as planning and housing allocation, making sure that the needs
  of the new areas absorbed into Plymouth City Council are reflected and balanced with those of
  the existing authority.
- Reduction in staffing and efficiency of works. Will there be a lack of 'on the ground' knowledge reflective of the whole area?
- Smaller areas needs may get overlooked.
- That a priority to deliver cost / efficiency savings isn't at the expense of staffing and resources required to deliver what will be expanded services.

In response to the question: Thinking about the long term (not just the next couple of years) what opportunities would you like there to be for Plymouth businesses?, participants said:

- Increased opportunity's to build housing for the new jobs coming. Not everyone wants to live in a city centre.
- Consistency on the procurement asks of businesses across the regions to help streamline our strategies and internal development etc.
- Breadth. For resilience. Not overly reliant in 1 or 2 sectors.
- Greater certainty on opportunities to incentivise investment.
- Hopefully, businesses only with a PL postcode getting the work in Plymouth.
- Utilising local businesses and consultants for local work and projects.
- A way to share our long term plans with you.
- Working with those on the ground and actually listening to them.
- Become better at attracting private funding to support gov funded redevelopment.
- Strong investment in forward thinking infrastructure that allows growth to happen in a sustained and sustainable way.
- Nationally focussed campaign on strength of combined area for advanced manufacturing.
- Increased opportunities with development partners to deliver private rented sector/build to rent in Plymouth city centre.

AC\_218576543\_1 3

- A focus on working with local businesses.
- Opportunity to consider how public transport integrates across the region to improve service.
- Wider tender agreements for both social and private housing.
- Better consistency with planning and development, ensuring not all areas are left behind.
- Ability to attract larger employers to the region in order that job opportunities, particularly at a senior level, become available.
- A fully joined up approach across the southwest for growth and resilience not an enlarged Plymouth and Exeter working against each other.

As you can see from these responses there is clear in principle support for unitary government in Devon and in particular for Plymouth's expanded area.

There was also a fourth question asked about future engagement by any expanded authority with local business. Plymouth Regeneration Forum members could also see other benefits from the streamlined proposal for four unitary councils in Devon in terms of public sector service reform building upon business relationship programmes that already exist and which could be enhanced in the future so that the voice of business is heard in future strategic growth discussions.

I trust the above comments are of assistance and we look forward to discussing local government reform again in the new year when the government publishes its statutory consultation.

Yours sincerely

**Christopher Stephens** 

Chair of Plymouth Regeneration Forum c/o Womble Bond Dickinson (UK) LLP

Christopher Stephens

AC\_218576543\_1 4



**Professor Claire Taylor** Vice-Chancellor's Office Plymouth Marjon University Derriford Road **Plymouth** PL6 8BH

21st October 2025

**Tudor Evans OBE** Leader, Plymouth City Council

Dear Tudor,

#### **Local Government Reorganisation in Devon**

For over 180 years, Marjon staff and students have sought to make a difference for individual lives and communities. Founded in London in 1840 and moving to Plymouth over 50 years ago we are proud to be 'place-based', working regionally, nationally and globally where there is a need to address inequity, raise aspiration and provide graduates to fill higher level skills gaps. Our strategy, Marjon 2030, makes clear that we are a university driven by strong principles of social justice, rooted in our Church of England foundation, and committed to the common good. We work within a values framework, and our purpose is to tackle inequity.

Our focus is to ensure that we provide outstanding graduates to work in the public, professional and community sectors. Our curriculum is designed with employers to ensure relevance, and we are proud of our track record across key areas of need including professionals working within education, health, criminal justice, business, social and human sciences. We therefore recognise our central role in addressing the projected employment opportunities in the city arising from the defence deal, other regeneration initiatives, and the huge opportunities that will come with a new structure of local government in Devon. Critically, we have a role to play ensuring our public services infrastructure is fit for purpose.

I am aware of your proposal to expand Plymouth's boundary into the South Hams to create a larger unitary council. Given the huge pipeline of growth planned for the city, and the need to link the opportunities that will arise from this to the aspirations of young people in the city, especially those from more deprived backgrounds, I see educational advantages to your proposal. These include more simplified and unified governance, opportunities for improved strategic coordination in relation to educational progression pathways, strengthening preventative support and early intervention for children and families, and more integrated long-term school-place and infrastructure planning. I therefore support your proposed boundary extension.

It is also important to point out how your proposals for the whole of Devon will provide a strong foundation for the work of the proposed South-West Peninsula Mayoral Strategic Authority. This will be essential to better coordinate the delivery of higher skills on a regional basis making the most of the powers and funding devolved to it once it is established. The recent Post-16 Education and Skills White Paper is explicit about the role for Strategic Authorities in this respect.

I have also been made aware of your proposal for the replacement of the existing two-tier local government arrangements in Devon with four unitary councils. Again, this will simplify how the education sector can engage with a streamlined local government structure to deliver more targeted skills programmes and clear progression pathways linked to the new economic opportunities. I therefore support your proposals for local government reorganisation in Devon.

I would be grateful if the City Council could continue to keep me informed of progress on local government reorganisation.

Yours sincerely,

Professor Claire Taylor

Vice-Chancellor and Chief Executive

Plymouth Marjon University

Cisaylor

# ARTS UNIVERSITY PLYMOUTH



17 October 2025

Tudor Evans OBE Leader, Plymouth City Council

**Dear Tudor** 

#### **Local Government Reorganisation in Devon**

As Chair of the Destination Plymouth's Brand Development Group and following my recent presentation of the city's new brand strategy, I am writing to formally address the matter of local government reorganisation in Devon.

Plymouth is currently experiencing an exciting period of change and growth. Having been briefed on your proposals for an expanded Plymouth and the creation of four unitary councils in Devon, I believe this initiative aligns perfectly with our city branding values: **to go boldly, go together, and go far**. I believe a streamlined structure of local government is essential to reflect and support this vital new agenda.

As Vice-Chancellor of Arts University Plymouth, and looking from an educational perspective, we see numerous benefits from your proposal including:

- Simplified and unified governance for the delivery of education services.
- Improved strategic coordination of school place planning, particularly for Special Educational Needs and Disabilities (SEND).
- Enhanced integration of early help and family hubs, strengthening preventative support and early intervention for children and families.
- The capacity to attract and retain creative graduates, which is essential for filling the estimated 25,000 new jobs arising from the transformational initiatives recently announced for the city.

Our role as a specialist Arts University is to provide the creative and cultural capacity cultivated through practice-based research and education. Our graduates develop the skills and attributes necessary for Plymouth's unique, nationally significant growth agenda. However, we believe the efficient delivery of this planned growth would be significantly compromised without your proposed structural changes to local government in Devon. Arts University Plymouth therefore unequivocally endorses Plymouth City Council's proposals for local government reorganisation in Devon.

Yours sincerely

Professor Paul Fieldsend-Danks Vice-Chancellor & Chief Executive



Plymouth **Growth** Board

Richard Stevens
Chair of Plymouth Growth Board
I Milehouse Road
Milehouse
Plymouth
Devon
PL3 4AA

17th October 2025

Tudor Evans OBE Leader, Plymouth City Council Council House Armarda Way Plymouth PLI 2AA

#### **Local Government Reorganisation in Devon**

Dear Tudor,

I am writing to you as the Chair of the Plymouth Growth Board. As you know the Plymouth Growth Board (PGB) is a public private partnership, bringing together representatives from key businesses and business organisations, Plymouth's three universities, City College Plymouth, representatives of the voluntary and community sector, Plymouth Culture, and others. Its primary role is to ensure city organisations collaborate and oversee the delivery of the Plymouth Economic Strategy and Plymouth Plan. It is the recognised voice of business in delivering economic growth.

Firstly, I would like to thank you and your officers for regularly engaging and consulting with the Plymouth Growth Board on local government reorganisation in Devon since the publication of the government's white paper. We feel well-versed in the issues arising from local government reorganisation for business and are aware of the various options being put forward.

Plymouth Growth Board supports the government's proposal to move to a simpler and more efficient unitary structure of local government for Devon. We believe strongly from our experience that this will remove duplication and inefficiency and deliver significant savings.

Plymouth Growth Board strongly supports the proposal by Plymouth City Council for four unitary council's in Devon to replace the current two-tier system. We especially endorse the part of the proposal which seeks to extend the boundary of the city to encompass the towns and villages immediately surrounding Plymouth which from a business perspective are already economically linked to the city. We see the following benefits of this proposal for business:

- Driving strategic economic growth and investment on and expanded economic footprint to deliver the Defence Deal, the plans for 10,000 homes in the city centre, the further investment in the Freeport and Enterprise Zone and the £6 billion regeneration pipeline.
- Creating city growth-orientated local authorities that can improve investor confidence and build upon the already close working relationships with business.



- Delivering both strategic infrastructure improving regional connectivity the rough the Plymouth Metro rail initiative and the completion of the current £719 million strategic and sustainable transport programmes.
- Enabling a more strategic and integrated approach to spatial planning both in relation to the new-style local plans required by the Planning and Infrastructure Bill but also allowing for an early start with a Peninsula Mayoral Strategic Authority Spatial Development Strategy
- Ensuring through workforce and skills development that the projected shortfall of some 25,000 jobs in Plymouth expected in the next 10 years arising from the expansion of the defence sector and opportunities linked to Plymouth's designation as the national centre for marine autonomy can be addressed with skills aligned to those new jobs.
- Ensuring simplified governance and more responsive service delivery arrangements for business with single points of contact.
- Putting the authorities on a firmer financial footing in order to maintain a focus on economic development and regeneration.
- Enabling the continued development of sector-specific opportunities, especially in relation to marine autonomy and the cultural sector.
- Facilitating a more strategic approach over a wider geographical area for the continuation of climate and sustainability initiatives.
- Enabling a much-needed acceleration of housing and future strategic land releases.

We believe that the creation of four unitary authorities for Devon (three of which have ambitious and complimentary strategies for growth and regeneration) will provide a strong urban voice for the planned Peninsula Mayoral Strategic Authority when it is created.

We also see other benefits from the streamlined proposal for four unitary councils in Devon in terms of public sector service reform building upon business relationship programmes that could be enhanced in the future so the voice of business is heard in future strategic growth discussions.

We look forward to further engagement with you in the future when the statutory consultation is undertaken by the Secretary of State for Housing Communities and Local Government which we understand will be early in 2026.

Your sincerely,

Richard Stevens MBE
Chair, Plymouth Growth Board



Verena Womersley Chair, Plymouth Housing Development Partnership C/o Clarion Housing Group 8 Shelley Way, Plymouth, Devon, PL5 I QF

17 October 2025

Tudor Evans OBE Leader, Plymouth City Council

Dear Tudor,

#### **Local Government Reorganisation in Devon**

I write as the Chair of the Plymouth Housing Development Partnership (PHDP). The PHDP is a group of 9 leading Housing Associations working with the City Council and Homes England to maximise the delivery of new affordable housing in Plymouth. Collectively our members manage more than 20,000 affordable homes in the city and invest many tens of millions of pounds into their existing and new build properties every year.

Following the briefing and discussion with the PHDP members and Council officers, the Partnership members voiced support of the government's proposal to move to a simpler and more efficient unitary structure of local government for Devon. During the session it was discussed by members that they believe this has ability to benefit the cross boundary working that the housing associations achieve in providing affordable housing across the whole of Devon.

The consensus within the PHDP was that the proposal by Plymouth City Council for four unitary council's in Devon - replacing the current two-tier system - gives rise to providing an improved strategic approach to the housing challenges of the area and enabling an acceleration of housing delivery within an expanded Plymouth. The proposed extension of the city boundary into the wider housing market area could in our members view enable a more strategic approach to future growth.

We also believe that the proposal by Plymouth City Council provides a clear opportunity to drive the delivery of a significant numbers of new homes for all the new jobs arising from the investment in the dockyard and the plan for "A Town in the City" comprising 10,000 homes.

We look forward to more detailed discussions with you and your officers once the government announces their intentions for local government in Devon.

Your sincerely,

Verena Womersley Chair, Plymouth Housing Development Partnership



**Tudor Evans OBE** Leader Plymouth City Council **Ballard House** 26 West Hoe Road **Plymouth** PL1 3BJ

Thursday 06th November 2025

Dear Tudor,

#### **Local Government Reorganisation in Devon**

I am writing to you in connection with local government reorganisation following briefings from your officers over this the course of this year.

The University of Plymouth sees the benefits of working with a Peninsula Mayoral Strategic Authority when it is established to deal with regional matters, especially skills, once government announces its devolution plans for the southwest. In principle, we also support the government's proposal to move to a simpler and more efficient unitary structure of local government for Devon which we believe will benefit education providers across the whole of Devon.

Plymouth City Council has proposed four unitary councils in Devon to replace the current two-tier system in place outside of Plymouth and Torbay Unitary Authorities. We recognise that not all councils in Devon are supportive of this approach and that issues of boundary changes are contentious ones. However, given the newly announced Defence Growth Deal and our on-going collaborations together, we believe it is important that Plymouth's unitary authority has the scale and capacity to ensure that these investments deliver real and lasting benefits to the city and more widely. As such we are supportive of your proposal, include the proposed boundary changes.

At the University of Plymouth, we are significantly investing in our campus and facilities to ensure a first-class learning, research and working environments as part of our commitment to a "triple gold student experience." We are at the forefront of globally significant research in relation to marine science and engineering, climate change, and oceanography. This is vital to the wider growth agenda of the city as we need to recruit and retain bright young people to fill the projected shortfall of some 25,000 jobs because of Plymouth's unique role related to defence of the realm.

We look forward to hearing from you further in the future on local government reorganisation.

Yours sincerely,

**Professor Richard Davies** 

Richard Davie

Vice-Chancellor and Chief Executive

# **Appendix 5 - List of figures and tables**

Figure/	Page	Description	Source
Table	number	·	
Figure 3.1	Page 15	A map showing the proportion of population working in Plymouth from neighbouring areas.	Original content developed by Plymouth City Council, derived from Census 2021 data Nomis - Official Census and Labour Market Statistics
Figure 3.2	Page 16	A map showing the Plymouth Policy Area	Original content developed by Plymouth City Council to illustrate the Plymouth and South West Devon Joint Local Plan: The Plymouth Plan   SOI - Delivering the spatial strategy
Figure 3.3	Page 17	A figure showing the Plymouth Metro Local Rail Network	Original content developed by PCC to illustrate the Plymouth Metro Local Rail Network
Figure 5.1	Page 29	A map showing the base case for Devon	Original content developed for this document; derived from Open Geography Portal
Table 5.1	Page 29	A table showing the assessment of the Base Case for Devon against the Government criteria	Original content developed for this document.
Figure 6.1	Page 33	A map showing the expanded 4 unitary authorities	Original content developed for this document; derived from Open Geography Portal
Figure 8.1	Page 36	A map showing Travel to work areas in the South West	Original content developed for this document; derived from 2011 ONS Travel to Work Areas
Figure 11.1	Page 44	A map showing the base case	Original content developed for this document; derived from Open Geography Portal
Figure 11.2	Page 45	A map showing the Plymouth base case	Original content developed for this

Figure/ Table	Page number	Description	Source
			document; derived from
			Open Geography Portal
Figure 11.3	Page 48	A map showing the	Original content
		Torbay base case	developed for this
		-	document; derived from
			Open Geography Portal
Figure 11.4	Page 51	A map showing the Exeter	Original content
		base case	developed for this
			document; derived from
			Open Geography Portal
Figure 11.5	Page 54	A map showing the Devon	Original content
		Coast and Countryside	developed for this
		base case	document; derived from
			Open Geography Portal
Table 11.1	Page 57	A table showing the base	Original content
		case assessment against	developed for this
		the government criteria.	document.
Figure 12.1	Page 59	A map showing the	Original content
		modification – Four	developed for this
		Unitary Authority Option	document; derived from
			Open Geography Portal
Figure 12.2	Page 60	A map showing the	Original content
		expanded Plymouth	developed for this
		modification	document; derived from
			Open Geography Portal
Figure 12.3	Page 63	A map showing the	Original content
		expanded Torbay	developed for this
		modification	document; derived from
			Open Geography Portal
Figure 12.4	Page 66	A map showing the	Original content
		expanded Exeter	developed for this
		modification	document; derived from
			Open Geography Portal
Figure 12.5	Page 69	A map showing the Devon	Original content
		Coast and Countryside	developed for this
		modification	document; derived from
<del>-</del>	<b>.</b>		Open Geography Portal
Table 12.1	Page 71	A table showing the	Original content
		assessment of the	developed for this
		modified four unitary	document.
		model against the	
F: 12.	D 74	government criteria	
Figure 13.1	Page 74	A map showing the New	Original content
		Devon proposal	developed for this
			document; derived from
	<u> </u>	1	Open Geography Portal

Figure/	Page	Description	Source
Table	number		
Figure 13.2	Page 76	A map showing Plymouth	Original content
		in the new Devon	developed for this
		proposal	document; derived from
F: 12.2	D 77		Open Geography Portal
Figure 13.3	Page 77	A map showing Torbay in	Original content
		the new Devon proposal	developed for this
			document; derived from
Figure 12.4	Page 70	A man showing Dayon in	Open Geography Portal
Figure 13.4	Page 78	A map showing Devon in	Original content
		the new Devon proposal	developed for this document; derived from
			Open Geography Portal
Table 13.1	Page 80	A table showing the	Original content
Table 13.1	1 age 00	assessment of the New	developed for this
		Devon proposal against	document.
		the government criteria	document.
Figure 14.1	Page 83	A map showing the 1-4-5	Original content
1.84.6	. 486 65	proposal	developed for this
		p. spesa.	document; derived from
			Open Geography Portal
Figure 14.2	Page 84	A map showing Plymouth	Original content
		in the 1-4-5 proposal	developed for this
			document; derived from
			Open Geography Portal
Figure 14.3	Page 85	A map showing a 4	Original content
		District Unitary in the I-	developed for this
		4-5 proposal	document; derived from
			Open Geography Portal
Figure 14.4	Page 87	A map showing a 5	Original content
		District Unitary in the I-	developed for this
		4-5 proposal	document; derived from
			Open Geography Portal
Table 14.1	Page 89	A table showing the	Original content
		assessment of the 1-4-5	developed for this
		proposal against the	document.
Eigune IF I	Page IAI	Government criteria.	Oviginal games:
Figure 15.1	Page 101	A figure showing the	Original content
		implementation of the	developed for this document.
Figure 17.1	Page 120	neighbourhood networks  A chart showing the	
i igul e 17.1	1 age 120	financial sustainability of	Original content developed for this
		the four unitary councils	document.
		in the base case in relation	document.
		to other unitary councils	
		nationally	
		nacionally	

Figure/ Table	Page number	Description	Source
Figure 17.2	Page 120	A chart showing the financial sustainability of the modified four unitary councils in relation to other unitary councils nationally	Original content developed for this document.
Table 17.1	Page 121	A table summarising the modelled position for the base case proposal	Original content developed for this document.
Table 17.2	Page 121	A table summarising the modelled position for the modified proposal	Original content developed for this document.
Table 17.3	Page 122	A table showing the number of housing stock in East Devon District Council, Exeter City Council, and Mid Devon District Council	Original content developed for this document.
Table 17.4	Page 124	A table showing the estimated savings (base and modified proposal)	Original content developed for this document.
Table 17.5	Page 126	A table showing the estimated Devon-wide implementation costs (base proposal)	Original content developed for this document.
Table 17.6	Page 127	A table showing the estimated Devon-wide implementation costs (modified proposal)	Original content developed for this document.
Table 17.7	Page 129	A table showing the estimated implementation costs for expanded Plymouth Council modification only	Original content developed for this document.
Table 17.8	Page 130	A table showing the financial profile up to and including Year 2032/33	Original content developed for this document.
Figure 17.3	Page 132	A chart showing the Usable Revenue Reserves as a proportion of Core Spending Power – Devon compared to other re- organising shire areas	Original content developed for this document.
Figure 17.4	Page 132	A chart showing the Usable Revenue Reserves and cumulative DSG	Original content developed for this document.

Figure/ Table	Page number	Description	Source
		deficit as a proportion of Core Spending Power – Devon compared to other reorganising shire areas	
Figure 17.5	Page 133	A chart showing the Capital Financing Requirement: Core Spending Power ratio — Devon compared to other reorganising shire areas.	Original content developed for this document.
Figure 17.6	Page 134	A chart showing the Usable Revenue Reserves as a proportion of Core Spending Power – Base proposal unitaries compared to existing English Unitary councils	Original content developed for this document.
Figure 17.7	Page 134	A chart showing the Capital Financing Requirement to Core Spending Power ratio – Base proposal unitaries compared to existing English Unitary councils	Original content developed for this document.
Figure 17.8	Page 135	A chart showing the Usable Revenue Reserves as a proportion of Core Spending Power – Modified proposal unitaries compared to existing English Unitary councils	Original content developed for this document.
Figure 17.9	Page 135	A chart showing the Capital Financing Requirement to Core Spending Power ratio – Modified proposal unitaries compared to existing English Unitary councils	Original content developed for this document.
Figure 20.1	Page 148	A chart showing the implementation timeline	Original content developed for this document; derived from MHCLG guidance
Table 20.1	Page 148	A table outlining implementation processes	Original content developed for this

Figure/ Table	Page number	Description	Source
		for continuing and new authorities.	document; not derived from external sources.
Table 20.2	Page 150	A table showing the implementation timeline for Plymouth	Original content developed for this document; derived from MHCLG guidance
Figure 20.2	Page 151	A figure showing the structure chart for the LGR implementation programme in Plymouth	Original content developed for this document; not derived from external sources.
Table 21.1	Page 152	A table showing the key risks of implementation	Original content developed for this document; not derived from external sources.

# **Appendix 6 - List of acronyms**

Acronym	Full Form	Explanation	
ASCOF	Adult Social Care Outcomes Framework	National performance measures for adult social care services.	
CASD	Continuous At Sea Deterrent	UK's nuclear submarine-based deterrent programme.	
cqc	Care Quality Commission	Regulator of health and social care services in England.	
DSG	Dedicated Schools Grant	Ring-fenced funding from the Department for Education for schools and education services.	
GVA	Gross Value Added	A measure of economic output and productivity.	
HRA	Housing Revenue Account	A ring-fenced account for income and expenditure related to council housing.	
ICO	Integrated Care Organisation	A partnership model integrating health and social care services.	
IDACI	Income Deprivation Affecting Children Index	A sub-measure of deprivation focused on children.	
IMD	Index of Multiple Deprivation	A composite measure of relative deprivation across England.	
LGBCE	Local Government Boundary Commission for England	Independent body responsible for electoral reviews and boundary changes.	
LGR	Local Government Reorganisation	A process led by central government to change how councils are structured and operate in a local area.	
MHCLG	Ministry of Housing, Communities and Local Government	Central government department overseeing local government.	
MSA	Mayoral Strategic Authority	A proposed regional governance model led by an elected mayor.	
MSOA	Middle Layer Super Output Area	A statistical unit of geography used by ONS for data analysis.	
MOD	Ministry of Defence	UK government department responsible for defence and armed forces.	

Acronym	Full Form	Explanation	
ONS	Office for National Statistics	UK's national statistical institute.	
РМО	Programme Management Office	A team responsible for governance and coordination of major programmes.	
RA	Revenue Account	The budget used for day-to-day service delivery and operational costs. It excludes capital expenditure.	
sco	Structural Change Order	A legal document issued by government that sets out the details of a local government reorganisation, including boundaries, powers, and transition arrangements.	
SEND	Special Educational Needs and Disabilities	A term covering children and young people who require additional support.	
TUPE	Transfer of Undertakings (Protection of Employment)	Legislation protecting employees when services transfer between organisations.	
UKSPF	UK Shared Prosperity Fund	Government fund supporting local economic development and regeneration.	
VCSE	Voluntary, Community and Social Enterprise	Sector comprising charities, community groups, and social enterprises.	

# Appendix 7 - Key terms explained

Term	Meaning	
Unitary authority	A single-tier local government responsible for all local services in its area, replacing the two-tier system of county and district councils.	
Continuing authority	An existing council that retains its legal identity and absorbs new areas during reorganisation, rather than being replaced or merged.	
Vesting day	The official date when the new council structures come into legal effect and begin operating.	
Ministerial modification	A change to a submitted proposal made by the Secretary of State to improve outcomes or align with government priorities.	
Neighbourhood networks	Proposed local forums that bring together councillors, parish representatives, and community organisations to influence decisions and improve services.	
Parish partnership agreements	Formal arrangements between the new council and parish councils to support collaboration and protect local identity.	
Plymouth growth area	A geographic area around Plymouth identified for strategic planning and development, including housing and infrastructure.	
Plymouth policy area	A planning concept used in the Joint Local Plan to defir the wider area that functions as part of Plymouth's housing and economic region.	
Joint Local Plan	A shared planning document developed by multiple councils to guide development and land use across a wider area.	
Spatial development strategy	A long-term strategic plan for where development should happen, including housing, transport, and infrastructure.	
Electoral review	A formal process to assess and redraw council ward boundaries to reflect population changes and ensure fair representation.	
Council tax harmonisation	The process of aligning council tax rates across newly formed or reorganised councils to ensure fairness.	
Capital receipts	Money from selling assets.	
Implementation executive	A temporary governance body within a continuing authority that oversees the transition to the new arrangements.	

Term	Meaning
Shadow council	A temporary council formed before vesting day to prepare for the launch of a new authority.
Extra care housing	Specialist housing designed for older people who need care and support but want to live independently.
Shared lives placements	A form of adult social care where individuals live with a carer in their home, offering a family-style environment.
Freeport	A designated area where normal tax and customs rules do not apply, intended to boost trade and investment.
Local Transport Authority	The body responsible for planning and managing public transport services in a given area.
Enhanced bus partnership	A formal agreement between councils and bus operators to improve services and coordinate investment.
Wellbeing hubs	Local centres offering integrated health, social care, and community services to support residents' wellbeing.
Civic agreements	Formal arrangements recognising the ceremonial roles of mayors and civic leaders across different communities.
Letters patent	A formal legal document issued by the monarch granting rights or status, such as Plymouth's Lord Mayoralty.

# **Appendix 8 - Sources**

Data sources and limitations

This proposal draws on a range of data sources to support the case for a four unitary model of governance. Wherever possible, we have used publicly available datasets published by central government departments, statutory bodies, and recognised sector organisations. These include official statistics, financial returns, and performance indicators.

In some instances, we have relied on data that is not publicly available. This includes proprietary analysis commissioned under commercial contract with external consultancies, as well as internal datasets held by participating authorities.

The analysis draws particularly on multiple Office for National Statistics datasets to provide the most accurate picture possible of local populations and service demand. However, detailed population data at small geographical levels is not always published consistently across all the areas we have examined. Where precise figures are unavailable, we have used approximations based on the most appropriate ONS sources for each geography.

This means that some figures represent best estimates rather than exact counts, particularly where we have needed to aggregate or disaggregate data across different statistical boundaries. We have applied consistent methodology throughout to ensure comparability between areas, but readers should be aware that all population figures carry some degree of uncertainty at the level of detail required for this analysis.

For social care demand analysis, we have used public and MSOA level data shared by participating authorities. This data has not been directly incorporated into this proposal, but we note for transparency that it is subject to varying definitions and recording practices between authorities, reflecting different service models and operational approaches. Any future analysis using this data would need to account for these variations.

## Demographic data sources

**Office for National Statistics**, *Population estimates for England and Wales: mid-* 202430. Published: July 2025. Available at: ONS — Population Estimates [ons.gov.uk]

Office for National Statistics, Census 2021 Small Area Multiples (OA level data) data via Nomis. Updated regularly. Available at: <a href="https://www.nomisweb.co.uk/sources/census\_2021">https://www.nomisweb.co.uk/sources/census\_2021</a>

Ministry of Housing, Communities & Local Government, English Indices of Deprivation 2025. Published: 30 October 2025. Available at: English indices of deprivation 2025 - GOV.UK

## **Boundaries and mapping**

Areas of Outstanding Natural Beauty / National Parks / National Landscapes - Natural England
Highways and Roads - OS Open Roads
Open Geography Portal - Lower Super Output Area, Middle Super Output Area, Output Areas, Parishes, Wards.

### **Economic development statistics**

Ministry of Housing, Communities & Local Government, Housing and Economic Needs Assessment Guidance. Last updated: 24 February 2025. Available at: GOV.UK – Housing Needs Guidance [gov.uk]

Office for National Statistics, Regional Gross Value Added (Balanced) by Industry: All ITL Regions. Published: 17 April 2025. Available at: ONS — GVA by Industry
[ons.gov.uk]

Office for National Statistics, Business Register and Employment Survey (BRES): Provisional Results 2023. Published: 4 November 2024. Available at: <a href="https://www.ons.gov.uk/releases/ukbusinessregisterandemploymentsurveybresprovisionalresults2023revisedresults2022">https://www.ons.gov.uk/releases/ukbusinessregisterandemploymentsurveybresprovisionalresults2023revisedresults2022</a>

Plymouth City Council, Foreign business investment is driving high value jobs in Plymouth. Published: 13 March 2023. Available at: <a href="https://www.plymouth.gov.uk/news/foreign-business-investment-driving-high-value-jobs-plymouth">https://www.plymouth.gov.uk/news/foreign-business-investment-driving-high-value-jobs-plymouth</a>

## **Local government metrics**

Children Services Data

**Department for Education**, *Explore Education Statistics*, published: n.d. Available at: <a href="https://explore-education-statistics.service.gov.uk/">https://explore-education-statistics.service.gov.uk/</a>

Adult Social Care Data

**NHS Digital**, Adult Social Care Activity and Finance Report, England, 2023–24, published: 31 October 2024. Available at: <a href="https://digital.nhs.uk/data-and-information/publications/statistical/adult-social-care-activity-and-finance-report/2023-24 [digital.nhs.uk]</a>

**Local Government Association**, *LG Inform*, published: n.d. Available at: https://lginform.local.gov.uk/ [lginform.l...cal.gov.uk]

## Local government initiatives

**Key Cities**: The network that speaks for urban UK. (n.d.). Available at: <a href="https://keycities.uk">https://keycities.uk</a>

**UK Government (Homes England).** Tens of thousands of new homes delivered for communities across England. Published 17 May 2024. Available at: <a href="https://www.gov.uk/government/news/tens-of-thousands-of-new-homes-delivered-for-communities-across-england">https://www.gov.uk/government/news/tens-of-thousands-of-new-homes-delivered-for-communities-across-england</a>

Plymouth City Council, Plymouth City Council and Homes England launch new City Centre Vision. Published: 27 March 2025. Available at: <a href="https://www.plymouth.gov.uk/news/plymouth-city-council-and-homes-england-launch-new-city-centre-vision">https://www.plymouth.gov.uk/news/plymouth-city-council-and-homes-england-launch-new-city-centre-vision</a>

**Plymouth City Council.** *Plymouth bus service improvements.* Published: April 2025 Available at: <a href="https://www.plymouth.gov.uk/bus-improvements">https://www.plymouth.gov.uk/bus-improvements</a>.

**Plymouth City Council.** *Plymouth and South Devon Freeport.* Available at: <a href="https://www.plymouth.gov.uk/plymouth-and-south-devon-freeport">https://www.plymouth.gov.uk/plymouth-and-south-devon-freeport</a>.

**Plymouth City Council**, Launching Team Plymouth: A united city, driving defence innovation and opportunity for all. Published: 19 September 2025. Available at: <a href="https://www.plymouth.gov.uk/news/launching-team-plymouth-united-city-driving-defence-innovation-and-opportunity-all">https://www.plymouth.gov.uk/news/launching-team-plymouth-united-city-driving-defence-innovation-and-opportunity-all</a>

**Plymouth City Council**, *Driving Growth in Plymouth Brochure*. Published: 2019. Available at:

https://democracy.plymouth.gov.uk/documents/s94752/Visitor%20plan%20cabinet%20report%20v5%20PK.pdf

**Plymouth Sound National Marine Park.** Homepage — Plymouth Sound National Marine Park. Published: n.d. Available at: <a href="https://plymouthsoundnationalmarinepark.com/">https://plymouthsoundnationalmarinepark.com/</a>

#### Financial data sources

Plymouth City Council, Council Tax Base Setting and Council Tax Support Scheme 2025/26. Published: 14 January 2025. Available at: <a href="Decision - Council Tax Base">Decision - Council Tax Base</a> Setting and Council Tax Support Scheme 2025/26 - Modern Council

#### Ministry of Housing, Communities and Local Government

Local authority revenue expenditure and financing England: 2025 to 2026 budget individual local authority data. Published: 19 June 2025.

Available at: GOV.UK – Local authority revenue expenditure and financing 2025 to 2026 [gov.uk]

Ministry of Housing, Communities and Local Government 2025-26 Local precepting authorities in England: Council Tax data spreadsheet. Published: 25 April 2025. Available at: Live tables on Council Tax - GOV.UK

**South Hams District Council** *Draft Statement of Accounts 2024-25.* Published: June 2025. Available at: <a href="https://www.southhams.gov.uk/sites/default/files/2025-06/SH%20Draft%20Statement%20of%20Accounts%202024-25.pdf">https://www.southhams.gov.uk/sites/default/files/2025-06/SH%20Draft%20Statement%20of%20Accounts%202024-25.pdf</a>

West Devon Borough Council Draft Statement of Accounts 2024-25. Published: June 2025. Available at: <a href="https://www.westdevon.gov.uk/sites/default/files/2025-06/WD%20Draft%20Statement%20of%20Accounts%202024-25.pdf">https://www.westdevon.gov.uk/sites/default/files/2025-06/WD%20Draft%20Statement%20of%20Accounts%202024-25.pdf</a>

**Mid Devon District Council** *Draft Statement of Accounts 2024-25.* Published: 13 June 2025. Available at: MDDC Statement of Accounts 2024/25

**North Devon Council Draft** *Statement of Accounts 2024-25*. Published: June 2025. Available at: <u>Draft statement of accounts 2024-25</u>

**East Devon District Council** *Draft Statement of Accounts 2024-25.* Published: 30 June 2025. Available at: <a href="eddc-statement-of-accounts-2024-25">eddc-statement-of-accounts-2024-25</a> draft .pdf

**Exeter City Council** Statement of Accounts 2024-25. Published: 22 August 2025. Available at: <a href="mailto:statement-of-accounts-2024-25-unaudited.pdf">statement-of-accounts-2024-25-unaudited.pdf</a>

**Teignbridge District Council** *Draft Statement of Accounts 2024-25.* Published: 4 July 2025. Available at: 2024-25-draft-statement-of-accounts-with-strata.pdf

**Torbay Council** Statement of Accounts 2023-24. Published: August 2024. Available at: Microsoft Word - Torbay SOA draft 2023-24 v1.1

# Local Government Reorganisation

## **Project details**

#### Assessment author

Joseph Harmer on behalf of the LGR team.

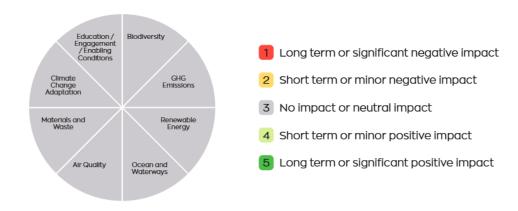
#### **Project summary**

This assessment covers Plymouth's proposal for Local Government Reorganisation.

This Climate Impact Assessment has been undertaken to evaluate the environmental implications of submitting a proposal for Local Government Reorganisation for Devon.

Plymouth City Council is acting in response to a formal government request and does not hold decision-making authority over the implementation of reorganisation, which remain subject to future decisions by the Secretary of State. Accordingly, this assessment evaluates only the strategic intentions stated in the document, based on the foreseeable environmental effects of the proposal.

## Summary of assessment



It is important to note that the likely climate impacts of implementing this proposal, or any competing proposals, are very uncertain at this stage. There is significant uncertainty regarding future governance arrangements mandated by central government, service delivery models, and spatial planning frameworks across Devon, all of which would materially influence environmental outcomes. These uncertainties preclude a robust assessment of long-term climate consequences at this stage.

The large geographical scope and long timescales for the delivery of the proposal, coupled with the absence of a complete baseline environmental profile of the existing administrative area, make it difficult to assess whether the proposal will enhance or degrade the environment, relative to the current situation or competing proposals. The proposal affects a wide range of geographies, from urban areas to rural parishes and the coast. The proposal can affect the medium- and long-term future of the areas in ways that cannot be fully anticipated at this stage. In addition, climate change introduces non-linear and unpredictable pressures on the environment, making forecasting difficult.

However, this assessment demonstrates the strategic commitment of the Council to transparency and environmental responsibility throughout the process and will support further assessment and mitigation planning on a case-by-case basis should implementation proceed.

#### Assessment scores

#### **Biodiversity**

#### Score

(3) No impact or neutral impact

#### Score justification

Biodiversity impacts will vary significantly depending on land use changes and development density across the area. Many of these impacts, such as habitat fragmentation, species migration, or tree canopy maturity, unfold over decades. Development projects will take place regardless of Local Government Reorganisation, and can have both beneficial or adverse impacts. For example, while tree planting programmes (such as the Plymouth and South Hams Community Forest) offer long-term benefits, construction and infrastructure expansion will cause ecological disruption.

The proposal states that "rural heritage is recognised and cherished" as part of the vision for the Plymouth area. It commits to strategic planning that "respects local character, protects green spaces, and ensures infrastructure keeps pace with growth." In addition, the proposal for Plymouth builds on a robust planning framework that already integrates biodiversity protection; the Plymouth, South Hams and West Devon Joint Local Plan.

The expansion of urban governance into rural areas could pose risks to biodiversity if not carefully managed. Equally, this expansion may improve coordination across ecological zones. The proposal's emphasis on local engagement and safeguarding rural identity present opportunities to better protect biodiversity.

#### **GHG Emissions**

#### Score

(3) No impact or neutral impact

#### Score justification

Assessing the likely impact of the proposed reorganisation on greenhouse gas (GHG) emissions presents significant methodological challenges and could only be speculative at this stage. The scope of the proposal is broad, encompassing multiple sectors and jurisdictions, and the outcomes depend on numerous variables beyond the control of the reorganised authority. These include future investment decisions, national policy shifts, and behavioural responses across diverse communities. For this reason, the proposal is assessed as having a neutral impact on GHG emissions.

Despite the limitations in quantification, the proposal demonstrates a clear strategic intention to uphold best environmental practice. Plymouth City Council's Net Zero Action Plan, which targets net zero by 2030, is explicitly committed to being scaled across the wider Greater Plymouth area. This extension builds on a robust existing strategy and is supported by major investment in low-carbon transport, district heating, and waste reform.

Existing environmental frameworks, including the Joint Local Plan, provide continuity and safeguards against emissions increases due to development. The proposal acknowledges public concerns, particularly regarding overdevelopment, loss of green space, and urban-led governance. These risks underscore the importance of inclusive environmental governance and tailored planning protections for rural areas.

## Renewable Energy

#### Score

(3) No impact or neutral impact

#### Score justification

The proposal is assessed as having a neutral impact on renewable energy generation, primarily due to the difficulty of quantifying outcomes at this stage. The scope of the reorganisation is broad, and the deployment of renewable energy infrastructure depends on multiple external factors, including national policy, market conditions, and local planning decisions.

While the proposal does not explicitly prioritise renewable energy, it includes several elements that support low-carbon energy systems. Plymouth's participation in the Advanced Zoning Pilot for district heating is a notable example, with potential to facilitate low-carbon heat networks. The proposal also references the Planning and Infrastructure Bill and the potential development of a Spatial Development Strategy for the Peninsula Mayoral Strategic Authority, both of which could enable coordinated regional planning for renewable energy infrastructure.

#### Ocean and Waterways

#### Score

(3) No impact or neutral impact

#### Score justification

The proposal is assessed as having a neutral impact on waterways and ocean health. This reflects the difficulty of evaluating outcomes in this domain, given the wide geographic scope of the reorganisation and the number of external variables involved. Marine and coastal ecosystems are influenced by national regulation and planning, and infrastructure delivery, much of which lies beyond the control of the reorganised authorities.

While the proposal does not include a dedicated strategy for marine and coastal environments, it references several initiatives that support ocean health, in particular the UK's first National Marine Park, with funding for public engagement, marine conservation, and sustainable economic development. The proposal mentions collaboration with the Environment Agency, SouthWest Water, and the National Trust, though not specifically in relation to marine health.

#### Air Quality

#### Score

(3) No impact or neutral impact

#### Score justification

The proposal is assessed as having a neutral impact on air quality. This reflects the difficulty of determining outcomes at this stage, given the wide scope of the reorganisation and the number of external variables involved. While transport habits are influenced by individual behaviour, local authorities retain significant control over development patterns, transport infrastructure, and planning policy, all of which shape air quality outcomes.

The proposal includes reference to current transport and planning measures that may support improved air quality, particularly in urban areas, with, for example, improvements to public transport, and successful partnerships (Plymouth Enhanced Bus Partnership and Peninsula transport). While the proposal is not intended as a comprehensive environmental strategy, its strategic direction shows good practice.

#### Materials and Waste

#### Score

(3) No impact or neutral impact

#### Score justification

The proposal is assessed as having a neutral impact on waste and materials management.

This reflects the difficulty of evaluating long-term environmental outcomes arising from administrative reorganisation. While local authorities retain control over service design, infrastructure investment, and operational standards, the environmental impact of these changes will ultimately depend on behavioural responses, such as household participation in recycling schemes and food waste separation.

The proposal does not include a quantified waste reduction target or an assessment of how reorganisation will affect waste generation or recycling performance in Devon. These outcomes will be shaped by future service decisions and the extent to which behavioural change is supported and sustained.

In Plymouth and the 13 parishes of the South Hams, the proposal demonstrates a strategic intention to align waste services with environmental best practice, with the introduction of food waste collections and the proposed integration of waste services across the Greater Plymouth area. These measures may over time improve operational efficiency and reduce emissions.

#### **Climate Change Adaptation**

#### Score

(3) No impact or neutral impact

#### Score justification

The proposal is assessed as having a neutral impact on climate adaptation. This reflects the inherent difficulty in evaluating adaptation outcomes at this stage, given the wide scope of the reorganisation and the number of external variables involved. Climate adaptation depends on long-term planning, behavioural change, and infrastructure delivery, much of which lies beyond the immediate control of the reorganised authorities.

Despite these limitations, the proposal demonstrates a strategic intention to support climate resilience through infrastructure, planning, and governance in the Plymouth and South Hams.

Public engagement highlights the importance of environmental resilience to residents. South Hams respondents raised concerns about infrastructure strain and planning pressures, while Plymouth residents emphasised safety, green infrastructure, and community resilience. These concerns reinforce the need for inclusive governance and locally tailored adaptation strategies.

#### **Education / Engagement / Enabling Conditions**

#### Score

(3) No impact or neutral impact

#### Score justification

In relation to environmental issues, Plymouth City Council supports community-led climate initiatives, including behaviour change campaigns and local partnerships. Plymouth's Net Zero Delivery Team facilitates the Climate Connections engagement platform and Plymouth Young Climate Ambassadors, engaging residents and young people in shaping the city's climate action plans.

Climate Impact Assessment LOC-7756-25 20-10-2025

In relation to community empowerment, the proposal puts forward Neighbourhood Networks to bring together councillors, parish representatives, and community organisations.

South Hams residents expressed a strong desire to retain local decision-making and protect rural identity, while Plymouth residents emphasised the need for trust-building, inclusive governance, and environmental education. Both groups valued green spaces, community pride, and responsive governance.

The proposal appears to respond directly to these concerns, particularly through its Neighbourhood Networks and community empowerment model. It builds on existing strengths in Plymouth's community engagement practice and proposes to extend these across the enlarged authority.

# **EQUALITY IMPACT ASSESSMENT – LOCAL GOVERNMENT REORGANISATION FINAL PROPOSAL**

#### SECTION ONE: INFORMATION ABOUT THE PROPOSAL

Author(s):	Emmanuelle Marshall	Department and service:	LGR Project Team	Date of	06/10/2025
The person completing the EIA template.				assessment:	
Lead Officer:	Ross Jago	Signature:	7	Approval	04/11/2025
Head of Service, Service Director, or Strategic Director.				date:	
Overview:	This Equality Impact Assessment (EIA) accompanies Plymouth City Council's submission to Government proposing the reorganisation of local government across Devon. The proposal responds to the Government's invitation issued alongside the English Devolution White Paper in December 2024, which sets out a national framework for structural reform. Plymouth's strategic case for change seeks to establish a more coherent and efficient governance model. The proposed changes aim to simplify service delivery, improve democratic accountability, and better reflect the functional geography of the region. If accepted, the proposed authorities would be operational from 1st April 2028. At this stage, the proposal remains subject to public consultation and central government decision. This EIA therefore focuses on the strategic intentions of the proposal and its potential equality and human rights implications, rather than implementation arrangements, which will be assessed separately if the proposal is implemented. This is both because the proposal remains subject to central government decision, and because it concerns an expanded geographical area outside of the Plymouth administrative boundary. Any future equality considerations arising from implementation under Plymouth's jurisdiction will be addressed through separate assessments at the appropriate stage.				
Decision required:	To note the content of this Ed Reorganisation Proposal for D	quality Impact Assessment of P Devon.	lymouth City Council's Draft L	ocal Governme	nt

## SECTION TWO: EQUALITY IMPACT ASSESSMENT SCREENING TOOL

Potential external impacts:		<b>~</b>	No	
Does the proposal have the potential to negatively impact service users, communities or				
residents with protected characteristics?				

	U
	מ
(	Q
	$\Box$
	N
	4
	ယ

Potential internal impacts:	Yes	<b>~</b>	No	
Does the proposal have the potential to negatively impact Plymouth City Council employees?				
Is a full Equality Impact Assessment required? (if you have answered yes to either of the questions above then a full impact assessment is required and you must complete section three).	Yes	•	No	
If you do not agree that a full equality impact assessment is required, please set out your justification for why not.	N/A			

# SECTION THREE: FULL EQUALITY IMPACT ASSESSMENT

U
ag
е
24
て

Protected characteristics (Equality Act, 2010)  Evidence and information (e.g. data and consultation feedback)	Adverse impact	Mitigation activities	Timescale and responsible department
--	----------------	-----------------------	--------------------------------------

Caro	<ul> <li>Children (0-15 years) 17.4%</li> <li>Working age (16-64 years) 64.1%</li> <li>Older people (65+ years) 18.5%</li> <li>Southwest</li> <li>15.9 per cent of people are aged 0 to 14, 61.8 per cent are aged 15 to 64.</li> <li>22.3 per cent are aged 65 and over.</li> <li>England</li> <li>17.4 per cent of people are aged 0 to 14.</li> <li>64.2 per cent of people are aged 15 to 64.</li> <li>18.4 per cent of people are aged 65 and over.</li> <li>(2021 Census)</li> <li>Engagement from people with the protected characteristic of age</li> <li>Older adults between the ages of 55 and 74 accounted for 313 respondents, or nearly 50% of all age-disclosing participants.</li> <li>9 respondents in South Hams and 5 respondents in Plymouth were between the ages of 16 and 24</li> <li>Additionally, a youth-specific event was held in Plymouth.</li> </ul>	No adverse impacts are anticipated at this early stage.  This is what we have learned so far in our consultation.  Feedback from youth groups in our consultation (p.4  Engagement report) indicates concerns about potential inequalities in access to services and representation. Young people highlighted the need for youth-led spaces, better transport, mental health support and involvement in decision-making. Young people in rural communities in particular highlighted accessibility challenges.  Older residents in rural areas may be concerned about reduced access to healthcare and transport during the process of reorganisation.  Concerns were expressed during engagement about health inequalities and inequality of service between urban and rural communities.	Continuity in service delivery for children and adults is a priority.  Mitigation plans for service continuity during reorganisation will be developed and delivered to ensure these ambitions are realised and risks are minimised should the proposal be selected by the Secretary of State.	
Care experienced individuals	It is estimated that 26 per cent of the homeless population in the UK have care experience. In Plymouth there are currently 7	No adverse impacts are anticipated at this early stage.	Continuity in service delivery for children and adults is a priority.	Not known yet.

Protected characteristics (Equality Act, 2010)	Evidence and information (e.g. data and consultation feedback)	Adverse impact	Mitigation activities	Timescale and responsible department
(Note that as per the Independent Review of Children's Social Care recommendations, Plymouth City Council is treating care experience as though it is a protected characteristic).	education, employment or training (NEET)		The needs of care- experienced young people are recognised in the proposal.  Mitigation plans for service continuity during reorganisation will be developed and delivered to ensure our ambitions for care experienced individuals are realised and risks to them are minimised, should the proposal be selected by the Secretary of State.	

Protected characteristics (Equality Act, 2010)	Evidence and information (e.g. data and consultation feedback)	Adverse impact	Mitigation activities	Timescale and responsible department
Disability	9.4 per cent of residents in Plymouth have their activities limited 'a lot' because of a physical or mental health problem.  12.2 per cent of residents in Plymouth have their activities limited 'a little' because of a physical or mental health problem (2021 Census)  150 respondents to the Plymouth and South Ham's surveys identified as having a disability or long-term health condition that limits daily activities.  This represents approximately 18.3% of all survey participants (150 out of 824).	No adverse impacts are anticipated at this early stage. Potential changes to service delivery, transport and healthcare provision resulting from the integration of the South Hams could disproportionately affect disabled residents who rely on accessible services.  While the engagement report does not disaggregate feedback from disabled respondents, the themes of digital inclusion, accessible service delivery, and local responsiveness were consistently raised and are particularly relevant to this group.	The proposal aims to improve strategic coordination of SEND services.  Wider concerns from this group will be considered in the implementation phase to ensure that the reorganisation does not disadvantage people with disabilities and that inclusive service design principles are upheld, should the proposal be selected by the Secretary of State.	Not known yet.

Protected characteristics (Equality Act, 2010)	Evidence and information (e.g. data and consultation feedback)	Adverse impact	Mitigation activities	Timescale and responsible department
• Gender reassignment	0.5 per cent of residents in Plymouth have a gender identity that is different from their sex registered at birth. 0.1 per cent of residents identify as a trans man, 0.1 per cent identify as non-binary and, 0.1 per cent identify as a trans woman (2021 Census).  Approximately 0.6% of all survey participants indicated that their gender identity is different from the sex assigned at birth.	The proposal does not include any measures that are foreseen to disadvantage or adversely affect individuals or groups with the protected characteristic of gender reassignment, transgender and non-binary individuals. At this strategic stage, no specific adverse impacts have been identified, but this group has specific safety, healthcare and community support needs that must be considered during implementation.	inclusive service design and equitable representation. Should the proposal proceed to implementation, the	Not known yet.

Protected characteristics (Equality Act, 2010)	Evidence and information (e.g. data and consultation feedback)	Adverse impact	Mitigation activities	Timescale and responsible department
Marriage and civil partnership	40.1 per cent of residents have never married and never registered a civil partnership. 10 per cent are divorced, 6 percent are widowed, with 2.5 per cent are separated but still married.  0.49 per cent of residents are, or were, married or in a civil partnership of the same sex. 0.06 per cent of residents are in a civil partnership with the opposite sex (2021 Census).	No adverse impacts are anticipated at this early stage.  Differences in the way services are delivered in the two areas to be aggregated, may result in indirect impacts such as changes to housing, benefits, or family services that will need mitigating if and when the programme reaches the delivery stage.	The Council is committed to treat individuals in all relationship statuses fairly and equitably. Should the proposal proceed to implementation, the Council will ensure that the specific needs of this group are considered through future assessments, in line with its statutory duties and commitment to inclusive service delivery.	Not known yet.
Pregnancy and maternity	The total fertility rate (TFR) for England was I.62 children per woman in 2021. The total fertility rate (TFR) for Plymouth in 2021 was I.5.	No adverse impacts are anticipated at this early stage. Service changes that may result from the proposal could affect access to public health interventions during pregnancy, access to early years and family support. These risks will be reviewed and addressed as and when the programme reaches implementation stage.	Should the proposal proceed to implementation, the Council will ensure that the specific needs of this group are considered through future assessments, in line with its statutory duties and commitment to inclusive service delivery.	Not known yet.

#### Race

In 2021, 94.9 per cent of Plymouth's population identified their ethnicity as White,
 2.3 per cent as Asian and I.I per cent as
 Black (2021 Census)

People with a mixed ethnic background comprised 1.8 per cent of the population. I per cent of the population use a different term to describe their ethnicity (2021 Census)

92.7 per cent of residents speak English as their main language. 2021 Census data show that after English, Polish, Romanian, Chinese, Portuguese, and Arabic are the most spoken languages in Plymouth (2021 Census).

## South Hams Survey

Out of 403 respondents to the South Hams survey, 288 individuals (71.46%) identified as White. A total of 10 respondents (2.48%) identified as belonging to ethnic minority groups, including 2 Asian or Asian British (0.50%), 2 Mixed or Multiple Ethnic Groups (0.50%), and 6 categorised as Other (not stated) (1.49%). Additionally, 5 respondents (1.24%) selected "Prefer not to say," and 100 respondents (24.81%) did not provide an answer to the ethnicity question.

### Plymouth Survey

Of the 421 respondents to the Plymouth survey, 290 individuals (68.88%) identified as White. A total of 11 respondents (2.61%) identified as belonging to ethnic minority

The proposals are not anticipated to have an adverse impact on individuals or communities on the basis of race. BME respondents contributed to the consultation, but numbers are quite small, affecting the robustness of the data. Cultural needs and experiences of discrimination may be overlooked in service design and governance changes if and when the reorganisation programme reaches the implementation stage.

Should the proposal proceed to implementation, the Council will ensure that the specific needs of this group are considered through future assessments and engagement, in line with its statutory duties and commitment to inclusive service delivery.

Not known yet.

Protected characteristics (Equality Act, 2010)	Evidence and information (e.g. data and consultation feedback)	Adverse impact	Mitigation activities	Timescale and responsible department
	groups, comprising 3 Asian or Asian British (0.71%), 3 Mixed or Multiple Ethnic Groups (0.71%), 1 Black, Black British, Caribbean or African (0.24%), and 4 categorised as Other (not stated) (0.95%). In addition, 12 respondents (2.85%) selected "Prefer not to say," and 108 respondents (25.65%) did not answer the ethnicity question.			
Religion or belief	48.9 per cent of the Plymouth population stated they had no religion. 42.5 per cent of the population identified as Christian (2021 Census).  Those who identified as Muslim account for 1.3 per cent of Plymouth's population while Hindu, Buddhist, Jewish or Sikh combined totalled less than 1 per cent (2021 Census).	The proposals are not anticipated to have an adverse impact on individuals or communities based on religion or belief. However, the risk that cultural needs and experiences of discrimination may be overlooked in service design and governance changes is noted and will be acted upon if and when the proposals are implemented.	Should the proposal proceed to implementation, the Council will ensure that the specific needs of this group are considered through future assessments, in line with its statutory duties and commitment to inclusive service delivery.	Not known yet.

Protected characteristics (Equality Act, 2010)	Evidence and information (e.g. data and consultation feedback)	Adverse impact	Mitigation activities	Timescale and responsible department
• Sex	51 per cent of our population are women and 49 per cent are men (2021 Census).	The proposals are not anticipated to have a direct adverse impact on women. However, women may be disproportionately affected by any changes to transport, safety, and community services that may indirectly result from the implementation of this proposal, especially if caring responsibilities are not considered when the delivery stage is reached.	Should the proposals be accepted by central government, further work will be undertaken during the implementation phase to ensure that women's needs and voices are considered.	Not known yet.
• Sexual orientation	88.95 per cent of residents aged 16 years and over in Plymouth describe their sexual orientation as straight or heterosexual. 2.06 per cent describe their sexuality as bisexual, 1.97 per cent of people describe their sexual orientation as gay or lesbian. 0.42 per cent of residents describe their sexual orientation using a different term (2021 Census).	The proposals are not anticipated to have a direct adverse impact on LGBTQ+ people. The needs or experiences of LGBTQ+ residents, particularly around safety and inclusion, could be overlooked in service design and governance changes. This risk will be addressed if and when the programme reaches the delivery stage.	Should the proposals be accepted by central government, further work will be undertaken during the implementation phase to ensure that LGBTQ+ residents needs and voices are considered.	Not known yet.

#### **SECTION FOUR: HUMAN RIGHTS IMPLICATIONS**

•	Human Rights	Implications	Mitigation Actions	Timescale and responsible department
		The proposal does not explicitly reference human rights legislation. However, its strategic design supports several rights under the Human Rights Act 1998. These include rights relating to non-discrimination, private life, and access to services. Risks to rights are minimal at the proposal stage but will require careful management during implementation, particularly in relation to service continuity and inclusive governance.	None at this stage. This objective will be pursued during the implementation stage if and when the proposal is retained.	Not known yet.

#### **SECTION FIVE: OUR EQUALITY OBJECTIVES**

Equality objectives	Implications	Mitigation Actions	Timescale and responsible department
<ul> <li>inclusion</li> <li>facilitate community cohesion</li> <li>support people with different backgrounds and lived experiences to get on well together</li> </ul>	The proposal aligns with Plymouth City Council's equality objectives by embedding inclusive governance principles, protecting local identity, and promoting community cohesion. It supports equality and diversity through co-designed neighbourhood governance, inclusive engagement frameworks, and strategic service integration. The proposal also recognises the importance of lived	will be pursued during the implementation stage if and when	Not known yet.

	experience, particularly among young people and rural communities.		
Give specific consideration to care experienced people to improve their life outcomes, including access to training, employment and housing.	The proposal supports improved outcomes for care-experienced people by committing to integrated service delivery across the Greater Plymouth area, including children's social care, housing, and employment support. It builds on Plymouth's existing transformation programme, which includes multi-agency Family Help services, targeted support for adolescents, and strategic coordination of housing and education. The proposal ensures continuity of care and access to opportunities for care-experienced individuals across the expanded geography, aligning with the Council's objective to improve life chances through inclusive, joined-up services.	None at this stage. This objective will be pursued during the implementation stage if and when the proposal is retained by central government.	Not known yet.
Build and develop a diverse workforce that represents the community and citizens it serves.	This objective is not explicitly addressed in the proposal, but the proposal doesn't adversely impact our ambition to achieve this.	This objective may need to be addressed separately or incorporated into future implementation planning. In the continuing authority status the proposal seeks to secure, this objective would continue to be pursued.	Not known yet.
Support diverse communities to feel confident to report crime and anti-social behaviour, including hate crime and hate incidents, and work with partners to ensure Plymouth is a city where everybody feels safe and welcome.	This objective is not explicitly addressed in the proposal, but the proposal doesn't adversely impact our ambition to achieve this.	This objective may need to be addressed separately or incorporated into future implementation planning. In the continuing authority status the	Not known yet.

T
Ø
Q
Φ
N
$\mathcal{O}$
()

	proposal seeks to secure, this	
	objective would continue to be	
	pursued.	

This page is intentionally left blank

# Plymouth City Council's Local Government Reorganisation Engagement Report



# CONTENTS



Executive summary	<u> </u>
Context	3
Overview of the engagement process	3
The Gunning principles	3
Summary of findings	4
Engagement website	8
Facilitated conversations	9
Media and building awareness	10
Stakeholder meetings	
South Hams survey demographic analysis	16
South Hams survey key LGR questions	19
South Hams Big Community Conversation events	26
Plymouth survey demographic analysis	33
Plymouth survey key LGR questions	35
Plymouth Big Community Conversation events	48
Plymouth Youth Big Community Conversation events	52

# c

## **EXECUTIVE SUMMARY**



#### Context

Local Government Reorganisation (LGR) is a UK Government initiative to simplify council structures and devolve more power to local areas. Plymouth City Council has responded to this call by proposing a modest expansion of its boundary to include 13 neighbouring parishes currently within South Hams District Council. This proposal aims to create a more sustainable, efficient, and strategically aligned local authority that better reflects the economic and social realities of the region.

The Council has already submitted its interim proposal to Government and is now developing a detailed proposal, due in November 2025. As part of this process, Plymouth City Council undertook a second phase of engagement to ensure the proposal is informed by local perspectives and reflects the needs and aspirations of communities across the proposed new boundary. At the time the engagement was undertaken Plymouth City Council was developing proposals for the wider Devon and therefore engagement was focused on Plymouth's immediate neighbours and City. Engagement was designed to respond to the Government's formal request that:

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

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

\*MHCLG invitation letter 5 February 2025

This report summarises the engagement activity carried out with residents and other key stakeholders on the Council's LGR proposals and their vision for the future of their local areas. It provides an overview of the feedback received during the engagement period and the conclusions which can be drawn.

#### Overview of the engagement process

The engagement process section of this report sets out the detailed activities that were undertaken to raise awareness and gather feedback.

The awareness raising mechanisms included: social media posts by Plymouth City Council and through CAN-Digital; emails to stakeholder contacts; briefings with stakeholders, the local MPs, political parties and councillors; facilitated conversation events with residents, press releases, hardcopy surveys available on request; and poster and leaflet distribution to businesses, schools, community buildings, GPs, dentists and pharmacies.

Information was shared and feedback was gathered through the dedicated project website, 19 community facilitated conversations, a survey hosted online and in hard copy format; presentations and 1-2-1 meetings with stakeholders.

#### The Gunning principles

The approach to the engagement was designed to be in-line with the Gunning principles:

- 1. Was the engagement carried out a formative stage?
  - Yes: The engagement is taking place while Plymouth City Council is still developing its detailed proposal for Local Government Reorganisation (LGR), ahead of a formal submission in November. Therefore, the process is still open to influence.
- 2. Was sufficient information provided?
  - Yes: The communications provide a clear explanation of what LGR is, what the Council's proposal is, FAQs
    addressing concerns and queries from the initial round of engagement early in the year. Detailed web pages
    continued to be updated throughout the engagement when additional enquiries were submitted.
- 3. Was there adequate time for consideration and response?
  - Yes: Events were held over multiple weeks, in different venues, at different times of day, to enable people to attend at a time and location suitable for them. The survey was online for four weeks.
- 4. Was their conscientious consideration of the feedback?
  - Yes: Resident engagement activity in this phase had concluded before the summer period to give adequate time for evaluation so the feedback could influence the final submission in November.



#### **Summary of findings**

The engagement process undertaken by Plymouth City Council between May and August 2025 has provided a rich and detailed picture of public sentiment across both Plymouth and the 13 South Hams parishes proposed for inclusion in an expanded Plymouth. The findings reveal a complex landscape of shared aspirations, divergent concerns, and clear expectations for how local government should evolve to better serve communities.

#### The views from residents

#### **Shared themes across Plymouth and South Hams**

Across both Plymouth and the South Hams parishes, there is a strong sense of place and pride in local identity. Residents value their communities for their natural beauty, social cohesion, and access to essential services. There is widespread support for the principle of local decision-making, with many respondents expressing a desire for governance that is responsive, transparent, and rooted in local knowledge.

Service quality is a recurring theme. Waste and recycling services, healthcare access, education, and transport infrastructure are consistently highlighted as priorities. While digital services are appreciated for their convenience, there is a clear expectation that councils must continue to offer face-to-face and telephone options, particularly for vulnerable residents and those in rural or digitally excluded areas.

Environmental protection is another unifying concern. Respondents across both areas emphasise the importance of safeguarding green spaces, promoting sustainability, and ensuring that future development does not compromise the character or ecological integrity of their communities.

#### Differences in feedback between Plymouth and South Hams

The most striking difference in feedback relates to the proposed boundary expansion. From those we spoke to in South Hams, there was significant resistance to being absorbed into Plymouth City Council. Many residents fear that their rural identity will be diluted, that urban priorities will dominate decision-making, and that services tailored to small communities will be lost. There is also concern about planning pressures, overdevelopment, and the potential erosion of local representation.

In contrast, Plymouth residents are more focused on the opportunities that reorganisation might bring. They express a desire for improved infrastructure, more affordable housing, better public transport, and enhanced cultural and economic vibrancy. While concerns about service quality and governance persist, the tone is generally more optimistic and future-oriented.

These differences underscore the need for Plymouth City Council to approach the final proposal with sensitivity and nuance. The proposal must demonstrate how the needs of both urban and rural communities will be met, and how governance structures will ensure fair representation and service delivery across the expanded area.

#### Youth perspectives

Young people in Plymouth provided thoughtful and forward-looking feedback. They value the city's green spaces, cultural venues, and sense of safety, but they also want more youth-led spaces, better transport, and improved mental health support. Their vision for Plymouth in 2050 includes a city that is inclusive, well-connected, and full of opportunity, with affordable housing, strong job prospects, and a vibrant cultural life.

This feedback highlights the importance of engaging younger residents in the planning process. Their priorities reflect long-term aspirations that should inform the design of services, infrastructure, and community engagement strategies.

#### Local governance and representation

Feedback from South Hams residents strongly emphasised the importance of parish councils in maintaining local identity, accountability, and community cohesion. Many expressed concern about the future role of these councils under any new governance arrangements, seeking reassurance that their influence and autonomy would not be diminished. There was a clear desire to preserve the hyper-local governance that parish councils provide, especially in rural settings where community ties are strong. Additionally, the engagement revealed widespread confusion about the current two-tier system of local government. Many participants conflated the roles of parish, district, and county councils, often attributing responsibilities incorrectly. This highlights a need for clearer communication and education around governance structures, both in the current system and any proposed changes, to ensure residents feel informed and empowered.



#### **Accessing services**

The engagement revealed a clear preference for a blended model of service delivery. Residents want the flexibility to access services digitally, by phone, or in person, depending on the nature of the issue and their personal circumstances. Libraries and community hubs are seen as vital access points, particularly in rural areas.

Plymouth City Council must ensure that any future service model is inclusive and adaptable. This includes investing in digital infrastructure and skills, maintaining physical service locations, and designing systems that are intuitive and accessible to all.

#### Communication and engagement preferences

Effective communication is essential to building trust and ensuring meaningful participation in local government. Throughout the engagement process, residents across both Plymouth and South Hams consistently expressed a desire to be genuinely involved in shaping decisions that affect their communities. There is a clear distinction made between meaningful engagement and what many perceive as tokenistic or "tick-box" exercises. People want to feel that their voices are not only heard but also acted upon, and that their input has a tangible influence on outcomes.

Face-to-face engagement was particularly valued. Many participants highlighted the importance of being able to speak directly with council officers in community settings, where conversations could be open, honest, and responsive. These interactions were seen as more personal and trustworthy than digital or written communications alone. The facilitated conversation events were widely praised for creating space for dialogue, and there is a strong appetite for these to continue beyond the current phase of engagement.

In the South Hams, Parish Councils emerged as a vital conduit for communication and representation. Residents view their Parish Councils as trusted, accessible, and deeply embedded in the fabric of local life. They want to see these councils empowered and actively involved in any future governance arrangements. Many respondents indicated that they would prefer to receive updates and participate in consultations through their Parish Councils, which they see as more attuned to local needs and concerns than larger, more centralised bodies.

To meet these expectations, Plymouth City Council must have an inclusive and flexible approach to engagement, recognising that different communities and individuals have different preferences and levels of access. Transparency, responsiveness, and follow-through will be critical. Residents want to see how their feedback is being used and to be kept informed of progress and decisions in a timely and accessible manner.

Ultimately, the success of the Local Government Reorganisation proposal will depend not only on the strength of the proposal but also on the quality of the relationships built with communities. Engagement must be ongoing, not episodic, and rooted in a genuine commitment to co-design and collaboration.





#### The views from stakeholders

The feedback gathered from stakeholders throughout the engagement process reflects a wide range of perspectives, but can largely be grouped under a set of consistent themes. These themes; governance and representation, service equity, financial transparency, planning and development, and community engagement including youth voice, mirror those identified through resident engagement and provide a useful framework for understanding the priorities, concerns, and aspirations expressed by partners across sectors. While each stakeholder brought a distinct lens shaped by their role or industry, there is a clear convergence around the need for strategic clarity, inclusive decision-making, and a commitment to delivering tangible benefits for communities across the proposed expanded authority.

#### Governance and representation

Stakeholders broadly recognised the potential for a more strategic and coherent governance model, with benefits in national influence and operational alignment. However, concerns were raised about democratic representation, particularly for rural communities, and the future role of parish councils. Questions around boundary choices and the risk of centralised decision-making highlighted the need for reassurance that local voices would remain influential.

#### **Service equity**

There was strong support for improving service consistency across the region, especially in housing, education, health, and safeguarding. The expansion was seen as a chance to better coordinate delivery, but stakeholders warned that growth must be matched by infrastructure and funding. Concerns included the sustainability of emergency services, health inequalities, and the risk of rural areas being underserved. In education, particular emphasis was placed on the implications for Special Educational Needs and Disability (SEND) provision, with questions around capacity, funding (including the High Needs Block), and the ability to meet statutory responsibilities. School leaders highlighted the need for clear planning to avoid delays in specialist placements, ensure continuity in Education, Health and Care Plans (EHCP) processes, and prevent resource dilution across a wider catchment.

#### Financial transparency

Financial clarity was a recurring theme. Stakeholders sought reassurance that the reorganisation would deliver value for money, with clear plans for council tax harmonisation, funding allocation, and cost-efficiency. There were questions about whether the scale of change justified the investment, and whether rural service costs might outweigh projected savings.

#### Planning and development

Planning was one of the most discussed areas. Stakeholders saw opportunities in unlocking land-led development, attracting investment, and aligning infrastructure strategies. However, there were concerns about the loss of rural planning expertise and the risk of marginalising smaller communities. The need for integrated planning across housing, health, and emergency services was widely emphasised.

#### Community engagement and youth voice

The Council's engagement efforts were welcomed, with calls for continued dialogue and broader inclusion. Stakeholders encouraged the use of varied communication channels and more targeted forums, particularly for Small and Medium Enterprises (SMEs) and sector-specific groups. Youth voice was highlighted as a priority, with suggestions to embed generational perspectives into future planning and investment.

#### Additional considerations

Some feedback extended beyond these core themes. Environmental and recreational partners called for better liaison and coordination, particularly around the coast path. The construction sector advocated for a local capability hub and stronger procurement strategies. Concerns were also raised about implementation timelines, regional collaboration, and the capacity of Plymouth's leadership to manage the expanded authority effectively.



#### Considerations for the final proposal

As Plymouth City Council prepares its final submission to Government, it must address several critical considerations:

**Governance and representation:** The proposal must outline how rural communities will be represented within the expanded authority. This includes exploring models which maintain and enhance parish councils, or advisory fora.

- Service equity: The proposal should demonstrate how services will be maintained or improved across all areas, with particular attention to rural needs, transport connectivity, healthcare access, and waste management. In education, stakeholders highlighted the importance of ensuring sufficient capacity and resourcing to meet increased demand, particularly for SEND provision. The transition must be carefully managed to avoid disruption to statutory responsibilities and ensure continuity for families and professionals.
- Financial transparency: Concerns about council tax harmonisation, funding allocation, and debt inheritance must be
  addressed clearly and credibly. Stakeholders want to understand how resources will be managed, including the financial
  implications of absorbing additional responsibilities such as SEND, and whether the reorganisation will deliver value for
  money without compromising service quality.
- **Planning and development:** The proposal should promote strategic planning that respects local character, protects green spaces, and ensures infrastructure keeps pace with growth to meet the needs of the expanded authority.
- Community engagement: Ongoing engagement must be built into the governance model. Residents want to be part of the decision-making process, not just consulted at key milestones. Mechanisms for feedback, participation, and accountability should be embedded in the proposal.
- Youth inclusion: The views of young people must be reflected in the final proposal. Their priorities for housing, transport, education, and wellbeing are essential to shaping a future-ready city.
- Local capability and procurement: Consideration should be given to how the expanded authority will support local economic resilience through procurement and investment.



#### **ENGAGEMENT APPROACH**



The engagement launched on 29 May 2025 with Plymouth City Councilissuing a press release announcing the engagement. This also included the launch of the engagement platform (<a href="Have Your Say Today - Big Community Conversation - Commonplace">Have Your Say Today - Big Community Conversation - Commonplace</a>)

#### **Engagement website**

The LGR engagement website was launched on 29 May 2025 to communicate information about the Council's proposals and the engagement opportunities, including the online survey.

From the launch, anyone could register to stay informed on the Council's plans by subscribing to email updates. This was done through the project website homepage.

A detailed Frequently Asked Questions section was updated throughout the engagement in response to questions raised from the community. Project updates were communicated through a 'Latest News Post' and this was emailed to all registrants of the project website.

For example, on the 12 June, those signed up for updates received an alert signposting them to additional FAQs that had been added to the website regarding 'Understanding Local Government', 'More about Plymouth City Council' and the impact our proposals will have on the local parish/town councils in South Hams.

From 29 May until 4 August there were 816 subscribers to the project website and 11,431 visitors.



#### Surveys

Two separate surveys were conducted, one for residents living within Plymouth's existing boundary, and another for those in the 13 South Hams parishes. The South Hams survey ran from 29 May to 10 July, while the Plymouth survey was open from 1 July to 3 August.

While both surveys were broadly similar, they were tailored slightly to reflect the different contexts and existing knowledge about each area. Their shared aim was to explore residents' perceptions of their local area and their aspirations for the future. Each survey gathered both quantitative and qualitative feedback, not only on the Council's proposals but also on wider community priorities.

Open-text responses were included throughout and have been thematically coded. The survey findings section includes tables showing the number of mentions for each theme.

An online survey was hosted on the Big Community Conversation website and printed copies of the survey were also available on request or at the facilitated conversation events.

A total of 824 people had their say across both surveys.



#### **Facilitated conversation events**

A series of Big Community Conversation events were held between May and July 2025. These events were designed to gather insights from residents and stakeholders to help shape the Council's detailed proposal for submission to Government.

A total of 19 events were held:

- 13 events in each of the proposed parish areas in South Hams
- 6 events in the centre / north / south / east and west of Plymouth city boundaries and a specific event for young people in Plymouth.

All events were held in accessible community venues and were open to any resident, regardless of location, allowing flexibility for attendees to choose the most convenient session.

#### **South Hams Parish Events**

- Shaugh Prior: (Monday 9 June) at Lee Moor Village Hall, I 0am to 12noon
- Sparkwell: (Tuesday 10 June) at Sparkwell Parish Hall, 6.30pm to 8.30pm
- Cornwood: (Monday 16 June) at Cornwood Village Hall, 6.30pm to 8.30pm
- Harford: (Tuesday 17 June) at Lukesland Gardens, 6.30pm to 8.30pm
- Ugborough: (Friday 20 June) at Ugborough Village Hall, 7pm to 9pm
- Ivybridge: (Saturday 21 June) at The Watermark Centre, 3pm to 5pm
- Brixton: (Tuesday 24 June) at Brixton Community Centre, 2.30pm to 4.30pm
- Yealmpton: (Wednesday 25 June) at Yealmpton Methodist Church, 6.30pm to 8.30pm
- Ermington: (Thursday 26 June) at Ermington Community Hub, 10am to 12noon
- Wembury: (Saturday 28 June) at Wembury War Memorial Hall, 10am to 12noon
- Newton and Noss: (Wednesday 2 July) at Newton and Noss Village Hall, 6.30pm to 8.30pm
- Holbeton: (Thursday 3 July) at Holbeton Village Hall, 6.30pm to 8.30pm
- Bickleigh: (Thursday 10 July) at Woolwell Centre, 6.30pm to 8.30pm

#### Plymouth city events

- City Centre: (Monday 21 July) at the Council House, Armada Way, PLI 2AA
- Plympton: (Tuesday 22 July) at the Rees Centre Family and Wellbeing Hub, Mudge Way, PL7 2PS
- Estover: (Thursday 24 July) at the ELM Wellbeing Hub, Leypark Walk, PL6 8UE
- Barne Barton: (Monday 28 July) at The Barn Family Hub, Kit Hill Crescent, PL5 [E]
- Elburton: (Tuesday 29 July) at Coombe Dean Academy, Charnhill Way, PL9 8ES

#### Plymouth youth event

• City Centre: (Wednesday 16 July) at the Council House, Armada Way, PLI 2AA open for all young people aged 12-18 years old.

In total: 489 people attended events



#### Meetings with other stakeholders / representatives of organisations, businesses and groups

A series of meetings with representatives of organisations, businesses and groups in the South Hams and within Plymouth who were willing to provide qualitative feedback on the proposals. Notes of these meetings were captured and fed into this report. This included:

- Parish Councils
- Devon Chamber of Commerce
- Plymouth Growth Board
- Plymouth Housing Development Partnership Plymouth Manufacturers Group
- Local Care Board Executive Group and Delivery Group
- Fred Thomas MP
- Luke Pollard MP

- Plymouth Regeneration Forum
- Local universities / schools
- Rebecca Smith MP

#### Media and building awareness

A media and digital communications campaign was launched, which included issuing press releases to the local media, inclusion in resident newsletters, organic social media campaign. The aim of the campaign was to raise awareness and to encourage attendance at the events and the completion of survey responses by using targeted digital advertising across Facebook, Instagram and Google Ads.

Our multi-channel approach ensured broad visibility and effective targeting, significantly boosting participation in the LGR consultation. For example:

Thirteen Parishes: Delivered via CANN Digital and in-house ads, with strong performance on Meta and Google Display.

Plymouth Residents: Area-specific ads (e.g. Estover, Barne Barton, Elburton) generated high reach and engagement.

Youth Engagement: Snapchat ads reached over 30,000 users, with the highest impressions among 18–24s and most clicks from 25-34s.

Community Promotion: Posts in 19 local Facebook groups supported in-person event attendance.

This resulted in:

- Platforms Used: Meta (Facebook and Instagram), Google Display, Snapchat, Nextdoor, LinkedIn, and local Facebook groups.
- Total Impressions: Over 2.1 million across all platforms.
- Total Reach: Over 100,000 individuals engaged.
- Total Clicks: More than 9,000 direct link clicks to the consultation.

#### In addition:

- Three press releases were issued, resulting in media coverage in publications e.g. The Herald and online at Plymouth Live / Devon Live / BBC Spotlight etc.
- Promotion was included in four editions of Plymouth City Council's weekly e-newsletter, which is distributed to 26,000 residents
- Social media posts on Facebook, X, Instagram, LinkedIn and Nextdoor.
- Staff communications to encourage Plymouth City Council staff to participate in the consultation in their capacity as residents who live and work in Plymouth or the South Hams.
- Posters and flyers were distributed to community venues, schools, dentists, GP surgeries, libraries and pharmacies.



#### **STAKEHOLDER FEEDBACK**



A series of meetings have been held with stakeholder to capture their views on the proposals. Industry specific presentations were created to outline the benefits of LGR to each sector. A number of the meetings, due to the large number of people attending, interactive feedback software was also used to capture feedback. Below is a summary of the discussions:

#### **Parish Councils**

Over the course of our engagement programme, Plymouth City Council has held one-to-one meetings with clerks and chairs from all 13 affected parish councils – Bickleigh, Shaugh Prior, Sparkwell, Brixton, Wembury, Cornwood, Harford, Ugborough, Ivybridge, Ermington, Yealmpton, Holbeton, and Newton and Noss. These discussions were followed by a Parish Conference on 19 March 2025, providing a platform for collective dialogue and feedback.

Over the past few months, Plymouth City Council also encouraged further participation, with many Parish Council's attending the Big Community Conversation events held in their local area. Some parish councils have expressed dissatisfaction with the LGR process and have formally requested that Plymouth City Council cease future direct engagement. Whilst efforts to build an ongoing relationship have not been successful there has been productive dialogue.

While an initial approach to neighbourhood governance proposals was discussed, further announcements from the Government relating to "Area Committees" means that our approach will be developmental, which parish councils will be welcomed to join. The parishes we met expressed a preference for a parish council forum with their future principal authority, along the same lines as was recently started by the South Hams District Council.

While there was recognition of the potential for improved service delivery – particularly in areas such as transport, housing, and economic development – they emphasised the importance of maintaining a rural-urban balance. The Parish Councils acknowledged the strategic economic ties between Plymouth and surrounding areas but stressed the need for any transition to respect the distinct character of rural communities. Practical concerns were also raised around council tax harmonisation, service continuity, and staffing, highlighting the need for clear planning and communication throughout the reorganisation process.

#### **Luke Pollard MP (22/08/25)**

Luke Pollard MP expressed strong support for Plymouth City Council's LGR proposals. He welcomed the engagement efforts, particularly the Big Conversation events, and appreciated the Council's coordination with other medium-sized, boundary-constrained cities. Mr Pollard also emphasised the importance of Plymouth remaining a Continuing Authority.

#### Marjon University (28/08/25)

Marjon's feedback sought clarity on the regional picture and raised questions about devolved skills funding, which is particularly relevant to them as an education provider. While they acknowledged the potential benefits of economies of scale and coherent planning, they cautioned that boundary changes might simply shift existing problems. Specific concerns were raised around education, including school places and SEND provision.

#### Plymouth Manufacturers Group (29/08/25)

The Plymouth Manufacturers Group provided a pragmatic and strategically focused perspective on the LGR proposals reflecting its businesses are located in Plymouth and the 13 parishes. Their feedback centred on the potential implications for business operations, future business support packages, investment confidence, and infrastructure development. A key concern was the continuity of services during the transition, particularly regarding planning applications, and how the reorganisation might affect access to central government grants. The group also highlighted a perceived tension between urban and rural priorities, questioning how the proposal would support future planning opportunities, including energy provision and hydrogen infrastructure.

Participants saw opportunities in clearer governance structures, reduced bureaucracy, and more joined-up infrastructure planning. Concerns were raised about the cost of delivering rural services potentially outweighing efficiency gains. There was strong interest in improving transport links, both regionally and nationally, to support industrial growth and international connectivity. The potential to leverage the Freeport, attract Science, Technology, Engineering and Mathematics (STEM) investment, and develop industrial business parks on the city's fringes was seen as a positive step toward economic resilience.



The group emphasised the importance of maintaining and enhancing existing communication channels with the Council. They praised current engagement mechanisms and relationships with Council officers, and recommended continued support for forums and roundtables that include SMEs as well as larger firms.

Suggestions included appointing dedicated liaison officers, developing a well-informed online business hub, and ensuring that procurement practices support local companies. Overall, the group expressed cautious optimism, with a clear desire for strategic clarity, inclusive engagement, and tangible benefits for the business community.

#### Plymouth Housing Development Partnership (01/09/25)

The Plymouth Housing Development Partnership (PHDP) identified clear opportunities in aligning infrastructure, housing, and service delivery across a wider geography. The expansion was seen as a chance to unlock land-led development, improve coordination with utility providers, and build investor confidence, particularly in the delivery of affordable housing and strategic planning for schools, SEND provision, and homelessness services.

There was strong support for the idea that a larger authority could enable more consistent and efficient service delivery, with better economies of scale and shared learning. Stakeholders highlighted the potential for new towns and larger-scale developments, while also emphasising the importance of maintaining a focus on smaller rural sites that make a meaningful difference to local communities. The proposal was viewed as a way to extend Plymouth's proactive and "can-do" approach to planning and development across a broader area.

However, concerns were raised about the pace and sequencing of infrastructure delivery, with fears that housing growth could outstrip essential services such as transport, utilities, and education. The potential loss of rural planning expertise and the centralisation of decision-making in Plymouth were seen as risks, particularly for smaller villages. The identity of rural communities was a recurring theme, with some stakeholders expressing discomfort at the idea of being absorbed into a city-led authority that may not reflect their distinct character or priorities.

There were queries around the implications for Local Housing Allowance (LHA) calculations and the continuity of services during the transition. The partnership called for enhanced collaboration with developers and service providers, and for mechanisms such as \$106 agreements to be used strategically to support local priorities. Communication was a key theme, with strong support for the existing PHDP forum and calls to use a range of channels, including social media, local media, interactive mapping tools, and in-person meetings - to keep stakeholders informed and engaged. The group also urged the Council to consider the generational dimension of the project, ensuring that the needs of young people are reflected in future planning and investment.





#### **Devon and Cornwall Police (03/09/25)**

Chief Constable Vaughan provided a clear endorsement of unitary local government from a policing perspective. He noted that single tier governance could simplify operations and partnerships, particularly safeguarding, and enable clearer alignment. While some structural adjustments would be needed, such as estate planning and some safeguarding service reconfiguration, the overall assessment was that unitary governance was operationally sound.

#### Plymouth Regeneration Forum (04/09/25)

Participants explored the rationale behind the use of parish boundaries rather than district ones, queried the minimum population size required by government, and asked whether there was sufficient political consensus to support the proposal. Concerns were voiced about the democratic implications of reorganisation, the potential impact on staffing and service continuity, and the risk of smaller communities being overlooked during the transition.

A recurring theme was the frustration within the construction sector regarding the lack of recognition of local capability. Stakeholders called for the creation of a Construction Capability Hub and a more strategic approach to procurement that prioritises local expertise and protects the "Plymouth pound."

Participants identified opportunities for a stronger collective voice at the national level, improved infrastructure planning, and more cohesive development across the region. The proposal was seen as a chance to reduce duplication, streamline service delivery, and attract both government and private investment - particularly in housing, jobs, and environmental infrastructure.

However, concerns remained about resourcing, the time lag for implementation, and the risk of decision-making vacuums. Participants warned that prioritising cost savings could undermine service delivery if not matched by adequate staffing and investment.

Participants emphasised the need for a joined-up regional approach that fosters collaboration rather than competition between cities like Plymouth and Exeter and stressed the importance of balancing growth with sustainability and resilience.

#### LCP Delivery Group (NHS) (04/09/25)

NHS colleagues raised important questions about population growth, funding settlements, and health inequality. They queried whether the government would increase funding to match the expanded population and whether the proposal would genuinely reduce deprivation or simply shift statistics. Concerns were also raised about wellbeing hub capacity and the need for ongoing involvement in planning.

#### South West Coast Path Association (04/09/25)

The association welcomed the opportunity for improved engagement with Plymouth City Council, noting that the expanded boundary would include more of the coast path. They highlighted missed grant opportunities and the need for better liaison arrangements.

#### University of Plymouth (09/09/25)

The University appreciated the briefing and expressed a strong civic commitment to the city. They asked detailed questions about governance, boundaries, and political implications, including whether parts of West Devon had been considered and how services would be managed post-expansion. They were interested in whether formal support was being sought and offered to engage further.

#### Devon and Somerset Fire and Rescue Service (12/09/25)

The Fire Service found the meeting helpful but raised concerns about the sustainability of services and the lack of coterminous boundaries. They noted that this could be costly in the long term. However, they saw opportunities in a more aggregated service model and expressed interest in strategic partnerships, including with Cornwall.



#### Rebecca Smith MP (11/09/25)

Rebecca Smith MP expressed scepticism about the proposal and raised concerns about the timetable. She highlighted worries about the status and impact on parish council assets and services, particularly around precepts and service duplication and reflected a preference for a smaller expansion.

#### Plymouth Growth Board (18/09/25)

The Plymouth Growth Board expressed clear and unequivocal support for Plymouth City Council's proposals around Local Government Reorganisation. Members highlighted that the move would simplify service delivery and infrastructure development, particularly in areas where people live and work across current administrative boundaries. The proposal was seen as a logical step that aligns with the city's economic footprint, housing targets, and travel-to-work patterns. It was also noted that the inclusion of the 13 parishes made geographical sense and would help reduce duplication and complexity in services such as planning, education, and care.

While there was some concern about the logistics of transitioning to a unitary authority and the potential disruption to statutory services, the Board acknowledged that financial modelling and risk assessments were underway to address these issues. Questions were raised about the overlap with devolution plans, particularly the proposed Peninsula Mayoral Strategic Authority, and the exclusion of Cornwall from current discussions. Despite these complexities, the Board concluded that the Plymouth proposition is well-founded and should be unequivocally supported, as it complements the city's long-term economic strategy and ambitions for growth.

#### Arts University Plymouth (AUP) (22/09/25)

Expressed strong support for the proposals. The university welcomed the opportunity for greater coordination between Plymouth's three universities and City College and saw potential for a more unified regional approach to education.

They considered this critical, noting that while institutions are national providers, there is a risk of overlooking regional needs. Strengthening reach into the wider region and engaging a broader demographic was seen as fundamental, and the expansion of Plymouth aligns well with this priority. AUP would support further consolidation of education provision, believing the proposals could help broker deeper collaboration between universities and colleges.

They also recognised wider issues affecting Plymouth as a coastal city, particularly transport challenges that impact students' ability to access education. There was hope that the proposals could accelerate improvements to city centre links and infrastructure, especially for those from rural communities. The university highlighted that its current 9 to 4 culture is shaped by these limitations, and expanding the city's borders could create opportunities to make studying more accessible. They also noted the potential for job creation and improved ability to service employment needs across a larger area. AUP encouraged consideration of the positive implications for the wider region, suggesting that even a modest population increase could reflect the city's ambition.

#### Schools Headteacher and Trust Leads Briefing (26/09/25)

Schools expressed a mix of cautious optimism and a number of questions regarding the potential impacts of Plymouth City Council's Local Government Reorganisation (LGR) on education delivery, particularly in relation to SEND provision. There was recognition that the reorganisation could simplify processes for families living on the fringes of Plymouth, who currently navigate between two local authorities.

A key theme is the anticipated increase in the number of pupils with SEND and the potential transfer of SEND schools from Devon to Plymouth. Headteachers identified the need for clarity on whether these schools will remain under Devon's jurisdiction or move to Plymouth, and the implications for existing plans to expand specialist placements. The timing of these developments in relation to needs assessment and planning processes was noted as requiring careful consideration.

The financial implications were discussed, particularly around the High Needs Block (HNB) of the Designated Schools Grant (DSG), which is under pressure due to costly independent placements. The transfer of Devon's HNB deficit and the approach to managing this within the new authority structure formed part of the discussion.

Operational considerations were also highlighted, including the increased demand on school transport, the transition of EHCPs to Plymouth's system, and the associated statutory responsibilities. The capacity and resourcing requirements for the Plymouth Education Team to manage a wider geographical remit, including outreach, health services, and multi-agency coordination, were identified as areas requiring planning. The need for clear processes during the transition period - particularly around EHCP reviews and funding agreements - was noted to ensure continuity for families and professionals.



#### Fred Thomas MP (03/10/25)

Fred Thomas MP was supportive of the proposals and highlighted the positive impact that Plymouth's expansion could have on the work being undertaken around HM Dockyard. He emphasised the importance of ensuring that the future expanded council maintains its focus on all communities across Plymouth, recognising that growth should not come at the expense of existing residents and neighbourhoods. He stressed the need for balanced investment and attention to both new and established areas within the expanded Plymouth.

#### Chamber of Commerce (08/10/25)

The overall sentiment from businesses attending the Devon and Plymouth Chamber of Commerce meeting was cautiously optimistic, with many recognising the potential benefits of Plymouth City Council's Local Government Reorganisation proposal, while also raising important concerns about implementation and long-term impact.

Businesses saw clear potential in the proposal to streamline public services and achieve economies of scale, particularly in transport, housing, and infrastructure.

Many welcomed the idea of a stronger, more unified voice for Plymouth at the national level, which could attract greater investment and improve regional visibility. There was enthusiasm for improved support for start-ups, apprenticeships, and local procurement, alongside hopes for a more joined-up skills agenda and better access to business support across the wider geography. Some also highlighted the opportunity to simplify service structures and reduce red tape, making it easier to do business locally.

Despite the optimism, several concerns were raised. Businesses questioned whether Plymouth City Council could effectively represent and support rural areas, noting the risk of urban-centric decision-making. There were worries about the financial implications of absorbing new areas, particularly around debt and infrastructure costs. Some feared a dilution of focus on growth and innovation during the transition period, and others highlighted the need for inclusive governance structures to ensure all voices are heard. The potential for disruption to existing business support services and the need for clearer strategic alignment across the region were also noted.

Looking ahead, businesses expressed a desire for more global-facing opportunities, improved transport links, and a stronger regional brand that benefits all areas. There was a call for greater collaboration between unitary authorities, consistent support for multi-location businesses, and a focus on local recruitment and skills development. Importantly, businesses want to see continued engagement, with open channels for feedback, early involvement in decision-making, and communication that is inclusive, responsive, and transparent.



#### **SOUTH HAMS SURVEY (DEMOGRAPHIC ANALYSIS)**



The following section presents the demographic information that was collected from respondents to the full survey. The survey recorded key demographic data that aids the project team's understanding of who took part in the engagement exercise. Demographic data was collected in an optional personal information section of the survey.

It is important to note that none of the below questions were compulsory.

#### Which parish do you live in?

When completing the questionnaire, respondents were asked to provide their postcode. The total number of survey respondents for this question was 403. Most respondents were from lybridge (which has the largest population of the 13 parishes).

Your Parish	Count	Percentage
lvybridge	104	25.81%
Newton and Noss	50	12.41%
Brixton	47	11.66%
Ugborough	33	8.19%
Bickleigh	32	7.94%
Wembury	30	7.44%
Ermington	24	5.96%
Holbeton	21	5.21%
Yealmpton	14	3.47%
Cornwood	12	2.98%
Plymouth	10	2.48%
Sparkwell	9	2.23%
Shaugh Prior	6	1.49%
No parish identified	4	0.99%
Harford	2	0.50%
Modbury	1	0.25%
Cullompton	1	0.25%
South Brent	I	0.25%
Kingsbridge	1	0.25%
Saltash	1	0.25%
Grand Total	403	

#### Age

The table below demonstrates a wide range of respondents from different age groups. Of those who provided their age, the age groups with the largest number of respondents were people aged between 55-64 (21 per cent) and people aged between 65-74 (15 per cent)

Age	Count	Percentage
Not given	95	23.57%
16-19	Γ	0.25%
20-24	3	0.74%
25-34	18	4.47%
35-44	38	9.43%
45-54	55	13.65%
55-64	85	21.09%
65-74	62	15.38%
75-84	36	8.93%
85+	4	0.99%
Prefer not to say	6	1.49%
Grand total	403	



#### Work status

The table below demonstrates the working status of each participant. Of those who responded to this question in the survey, the majority (37 percent) are working full time. However, many (32 per cent) were retired.

Work status	Count	Percentage
No answer	54	13.40%
In full-time education	4	0.99%
In part-time education	1	0.25%
Not in employment	8	1.99%
Not in employment but actively looking	2	0.50%
Retired	127	31.51%
Working full time	148	36.72%
Working part time	59	14.64%
Grand Total	403	

#### **Care** experience

Plymouth City Council recognises that care experience is an additional protective characteristic. Of those who answered the question, 35 people stated that they have experience of the children's social care system.

Care experience?	Count	Percentage
No answer	80	19.85%
No	267	66.25%
Prefer not to say	21	5.21%
Yes	35	8.68%
Grand Total	403	

#### **Armed Forces**

As part of our commitment to the Armed Forces, Plymouth City Council asks people if they currently or have previously served in the Armed Forces. Of those who answered the question nearly eight per cent have served, or are currently serving in the Armed Forces.

Armed Forces	Count	Percentage
No answer	93	23.08%
No	266	66.00%
Prefer not to say	12	2.98%
Yes	32	7.94%
<b>Grand Total</b>	403	

#### Sex

We asked all participants what their sex at birth.

Sex	Count	Percentage
Female	164	40.69%
Male	137	34.00%
Prefer not to say	12	2.98%
No answer	90	22.33%
Grand Total	403	

#### **G**ender

We asked all participants if their gender identity is the same as the sex they were registered with at birth.

Gender	Count	Percentage
Yes	296	73.45%
No	2	0.50%
Prefer not to say	8	1.99%
No answer	97	24.07%
Grand Total	403	

#### **Disability**

We asked all participants if day-to-day activities are limited due to a health problem or disability expected to last 12+ months.

Disability	Count	Percentage
Yes, limited a lot	П	2.73%
Yes, limited a little	35	8.68%
Prefer not to say	14	3.47%
No	250	62.03%
No answer	93	23.08%
Grand Total	403	

#### **Ethnicity**

We asked all participants to define their ethnicity.

Ethnicity	Count	Percentage
White	288	71.46%
Prefer not to say	5	1.24%
Other (not stated)	6	1.49%
Mixed or multiple ethnic groups	2	0.50%
Asian or Asian British	2	0.50%
No answer	100	24.81%
Grand Total	403	



#### South Hams survey key LGR questions (Online and Paper)

The total number of responses to the full survey was 403. The following section sets out the full analysis. Any demonstrable differences in findings by respondent type are stated within the commentary for those questions.

Qualitative data has been coded for themes and one response may contain multiple themes. This means that the number of themes mentioned in a thematic table may exceed the number of responses to that question.

Responses in this section include feedback received from the online and paper survey.

Again, none of these questions were compulsory.

#### What do you consider your local area?

This was a free text question, to enable the participants to define the 'place' in which they live and identify with. While the survey was targeted at residents in South Hams, the responses show that people tend to define their local area in terms of specific parishes and towns rather than broader regional labels – highlighting a place-based identity rooted in immediate communities.

Answer	Count	Additional commentary provided
lvybridge and	122	lvybridge is overwhelmingly the most frequently cited local area.
Surrounding Areas		However, it was often mentioned alongside nearby villages: Bittaford, Ugborough, Ermington, Modbury, Cornwood, Lee Mill, and South Brent.
		Indicates a strong sense of local identity tied to the town and its immediate rural surroundings.
(General	84	Many respondents refer to "South Hams" either generally or in combination with specific towns and villages.
or Multiple		Reflects a regional identity that encompasses multiple communities.
Locations)		Some explicitly state "South Hams NOT Plymouth," showing resistance to urban association.
Brixton,	63	These villages are frequently grouped together, suggesting a shared community or travel-to-work area.
Yealmpton, Wembury, and Newton and Noss Cluster		Newton and Noss and Yealmpton are often mentioned with Holbeton and Battisborough Cross.
Plymouth and Surrounding Urban Areas	27	A minority of respondents identify Plymouth or its suburbs (Plymstock, Crownhill) as their local area. Some mention the "Plymouth travel-to-work area," suggesting functional ties rather than cultural ones. A few responses explicitly reject Plymouth as part of their local identity.
Woolwell,	22	Woolwell is a prominent local identifier, often linked with Roborough and Bickleigh.
Roborough, Bickleigh		Some respondents associate Woolwell with Plymouth, while others distinguish it from the city. Reflects a semi-urban fringe identity.
Modbury,	18	These towns are often mentioned in combination.
Kingsbridge, Totnes, Salcombe		Reflecting a broader South Devon identity, especially in coastal and market town contexts.
Holbeton and Surrounding Villages	17	Holbeton is frequently grouped with Newton and Noss, Yealmpton, and Battisborough Cross. Indicates a strong rural community cluster.
South Devon	12	Some respondents refer to South Devon or Dartmoor National Park as their local area.
/ Dartmoor / National		Highlights environmental and landscape-based identity.
Landscapes Other Villages	П	These are often mentioned in combination with larger towns like lyybridge or grouped by parish.
and Parishes		Reflects dispersed rural identities.
Sherford	8	Sherford is emerging as a distinct local area, often mentioned with Elburton, Brixton, and Plympton.
		Reflects its growing role in regional development.
General	5	A few respondents define their local area by proximity rather than named locations.
Radius-Based Definitions		Indicates a functional or travel-based understanding of locality.
Not Plymouth	4	This was where people are explicit in their answer and don't provide any other detail.
Other	2	Didn't provide an exact location – but said 'countryside' or 'moors'



#### Where is your work or education based?

This was a free text question, to enable the participants to define where they work and identify the links between the parishes and Plymouth. The majority of respondents who are in work or education are based in Plymouth, underscoring the city's role as a key employment and education hub for South Hams residents. This highlights strong functional ties between rural parishes and the urban centre. However, a notable number also work from home or in nearby towns like lyybridge, reflecting the impact of hybrid working and the importance of local centres. The diversity of responses, including national and online roles, shows that while Plymouth dominates, work and education are increasingly decentralised and flexible.

Answer	Count	Additional commentary provided
Plymouth	76	Many respondents gave further details (eg Derriford)
Other named locations outside of South Hams or Plymouth	60	Numerous other locations are mentioned, including towns, villages, and institutions across the UK such as Paignton, Teignbridge, Tavistock, Torbay, London, and nationwide or online roles.
Work from home	27	A substantial number of respondents work or study from home, showing the impact of remote arrangements and hybrid working models.
Ivybridge	24	lyybridge is a significant local centre for work and education, with many respondents based here, including voluntary and hybrid roles.
Other South Hams towns and villages	14	Many respondents work or study in South Hams towns and villages such as Modbury, Brixton, Yealmpton, Wembury, Holbeton, and Newton Ferrers, indicating strong local ties.
Kingsbridge	6	Kingsbridge is mentioned as a work or education base, showing its role in the local economy and services.
Totnes	7	Totnes and Dartington are cited for work and education, reflecting their cultural and educational institutions.
Cornwall	4	Cornwall appears in a few responses, indicating cross-border commuting or study.
Exeter	3	Exeter is mentioned occasionally, likely due to its university and regional services.

#### Where do you do most of your shopping?

Shopping habits show a strong reliance on lyybridge and Plymouth, with lyybridge slightly ahead as the most frequently cited local destination. Lee Mill also features prominently, especially for supermarket access. The results highlight a blend of local loyalty and urban convenience, with many respondents also shopping online or in nearby towns and villages. This suggests that while South Hams residents value local options, they also depend on larger centres and digital platforms for variety and accessibility.

Answer	Count	Commentary
lvybridge	84	lyybridge is a key local shopping destination, frequently mentioned for its convenience and range of stores including Tesco and local shops.
Plymouth	78	Plymouth is a major urban shopping centre, cited for its city centre, supermarkets, and retail parks including Plymstock and Plympton.
Lee Mill	61	Lee Mill is popular for its large Tesco store and proximity to surrounding villages, often mentioned alongside lyybridge.
Online	56	Online shopping is widely used for convenience, accessibility, and delivery services, especially among those with mobility needs or preferences for remote shopping.
Remainder; local, own village, smaller town	28	Many respondents shop locally in South Hams villages such as Modbury, Yealmpton, Wembury, Newton Ferrers, and South Brent, supporting small businesses and local convenience.
Plymstock/ Plympton	22	These suburban areas within Plymouth are popular for supermarket shopping and are often mentioned alongside Plymouth or Lee Mill.
Other named locations	18	Includes less common or more dispersed shopping areas such as Saltash, Yelverton, Elburton, and Marsh Mills, as well as general terms like "local" or "varied."
Totnes	14	Totnes is known for its independent shops and market town atmosphere, attracting shoppers from nearby areas.
Exeter	10	Exeter is a regional shopping destination with large retail outlets and services, mentioned by those willing to travel further.
Woolwell/ Roborough	10	Woolwell and Roborough serve as local shopping hubs for nearby communities, with mentions of Tesco and Lidl.
Tavistock	7	Tavistock is mentioned occasionally, likely for its market and traditional shopping experience.
Kingsbridge	7	Kingsbridge offers local shopping options for nearby rural communities and is occasionally mentioned alongside Totnes and Modbury.
Not Plymouth	2	This is where people have been explict with their answers.



#### Where do you spend the most time socialising or taking part in cultural activities?

The responses show a balance between local engagement and regional travel, with many participants socialising or taking part in cultural activities across Devon, including Plymouth and Ivybridge. This suggests that while local towns and villages provide accessible options, residents are willing to travel for broader cultural experiences - highlighting both the value of nearby amenities and the importance of regional connectivity for leisure and social life.

Answer	Count
Across Devon for restaurants, pubs, theatres, beaches, outdoors etc	67
lvybridge	63
Plymouth	59
Wider South Hams	48
Stay local for pubs, walks, cafes, beaches	24
Not Plymouth	3

#### What is good about the area where you live?

This was a free text question. The responses highlight a deep appreciation for community spirit and the natural environment, with many residents valuing the friendliness, supportiveness, and social cohesion of their local areas. The beauty and tranquillity of the countryside, coastline, and Dartmoor are also central to people's sense of place. A strong rural identity, combined with access to essential amenities, contributes to a balanced lifestyle. While fewer respondents mentioned governance or transport, the overall sentiment reflects pride in living in a safe, clean, and well-connected area with a strong sense of belonging.

Theme	Count	Commentary
Community spirit	114	Residents consistently praised the friendliness, supportiveness, and strong social bonds within their communities. Many highlighted local groups, activities, and the sense of knowing one another, which contributes to a vibrant and inclusive atmosphere.
Natural environment	100	The beauty of the countryside, coastline, Dartmoor, and green spaces was a dominant theme.  Respondents valued the peacefulness, access to nature, and the unspoilt character of their surroundings.
Rural identity	85	Many emphasized the importance of maintaining a distinct rural character, separate from urban development. Living in small towns or villages, away from city noise and congestion, was seen as central to their lifestyle and identity.
Access to amenities	38	Respondents appreciated being close to essential services such as shops, schools, healthcare, leisure facilities, and public transport. The balance of rural living with convenient access to amenities was seen as a key strength.
Safety and cleanliness	24	Low crime rates, clean and tidy environments, and a general sense of safety and peace were frequently mentioned. These qualities were seen as vital to the quality of life in South Hams communities.
Local Services and facilities	П	There was recognition of the value of well-maintained local services such as GPs, schools, recycling, and council-run amenities. Respondents appreciated the role of the council in maintaining these facilities and ensuring they meet community needs.
Transport and connectivity	5	Some respondents highlighted the importance of good transport links, particularly to the A38 and nearby cities, as well as ease of commuting while maintaining a rural lifestyle.
Governance and representation	3	A few comments touched on the role of South Hams District Council, expressing satisfaction with its governance and concern about being absorbed into Plymouth City Council.



# What is not so great (about the area in question) and you would like to see improved, including Council Services?

This was a free text question. The most common concerns raised by residents relate to public transport and road conditions, highlighting a need for improved connectivity, infrastructure maintenance, and safer travel options. Access to services and amenities – particularly healthcare, leisure, and youth facilities – was also frequently mentioned, alongside frustrations with council coordination and governance. Issues around housing development, safety, and environmental stewardship reflect deeper anxieties about preserving rural identity and quality of life. These insights suggest that future planning should prioritise transport, infrastructure, and community services, while ensuring that growth respects the character and needs of South Hams communities.

Theme	Count	Commentary
Public transport	93	Dissatisfaction with infrequent and unreliable bus and train services, particularly in evenings and weekends.
		Poor connectivity to Plymouth and key destinations like hospitals and cultural venues.
		Limited options for non-drivers and elderly residents, and lack of footpaths or cycle paths.
Roads and potholes	92	Widespread concern about potholes, poor road surfaces, and lack of maintenance.
		Requests for bypasses (e.g. Lee Mill), safer walking and cycling conditions, better traffic management, and improved road layouts (especially in lvybridge).
		Speeding traffic, congestion, and inadequate infrastructure such as slip roads and roundabouts were frequently mentioned.
Access to services and	38	Lack of shops, leisure facilities, healthcare services, and community spaces.
amenities		Poor internet and postal services, limited recycling options, and concerns about affordability and rising costs.
		Desire for more community events, youth clubs, and better use of local parks and green spaces.
	28	Frustration with multiple overlapping councils and lack of coordination.
Governance and		Concerns about poor communication, planning enforcement, and representation.
Council services		Resistance to merging with Plymouth City Council and fears of losing rural priorities and identity.
Housing and development	17	Concerns about overdevelopment, urban sprawl (especially in Sherford and Newton), and the impact on infrastructure and the environment.
		Frustration with second homes, lack of affordable housing, and insufficient planning for supporting services like schools and roads.
Safety and anti-social behaviour	9	Issues included rising crime, lack of police presence, anti-social behaviour, vandalism, and poor waste management in communal areas.
		Pavement parking and unsafe traffic conditions were also noted.
Healthcare	6	Limited access to GP appointments and broader health services.
		Long referral times, lack of dental provision, and concerns about merging healthcare services with Plymouth.
Financial concerns	4	High council tax, parking fees, and general cost of living were mentioned as areas needing improvement.
		Desire for fairer banding and better value for money in service delivery.
Cleanliness and	4	Poor upkeep of public spaces, overgrown vegetation, and inadequate waste collection services.
maintenance		Requests for better landscaping and tidier village environments.
Environmental concerns	2	Loss of green space, poor environmental protection, and concerns about pollution and biodiversity.
		Desire for more sustainable planning and better stewardship of natural assets.



# What do you really value about the services (e.g. waste and recycling collection / leisure facilities / roads management / parks) your current councils provide?

People could submit more than one answer – the first four were suggested answers and then participants could also add their own. Residents most value councils that demonstrate local understanding and accessibility, with the highest praise given to councillors who are easy to reach and responsive to community needs. High-quality services, particularly waste and recycling, are also appreciated, alongside recognition of councils that understand the challenges facing rural areas. These responses suggest that trust and satisfaction are closely tied to visibility, local knowledge, and service reliability, reinforcing the importance of maintaining strong local representation and tailored service delivery.

Answer	Count
Easy access to my local councillor	139
Council understands my area	190
High quality services	132
Understands the challenges facing the area	96
Other answers:	
Other with no narrative	26
Recycling	20
Understanding rural area	14
Good quality schools	2
Good quality roads	2

# How do you hope that Local Government Reorganisation will impact you and/or your community?

People could submit more than one answer – the first three were suggested answers and then participants could also add their own. The majority of respondents expressed hope that reorganisation would lead to more locally made decisions and improved services, with clearer accountability. However, this optimism was strongly tempered by widespread opposition to being absorbed into Plymouth City Council. Many voiced concerns about losing rural identity, autonomy, and tailored service delivery. A significant number also expressed satisfaction with current arrangements and scepticism about the motives and benefits of change. Key themes included fears over council tax increases, environmental degradation, and urban-centric planning. Overall, the feedback highlights a desire for reform that strengthens local representation and rural priorities – rather than centralisation or urban alignment.

Answer / Theme	Count	Commentary
Improved services	125	
Decisions that impact you will be made locally	168	
Clearer who is responsible for	33	
what service	33	
Other answers:		
Strong Opposition to Joining	56	Clear and repeated rejection of being absorbed into Plymouth.
Plymouth City Council		Concerns about urban priorities dominating rural needs.
		Emotional appeals to preserve identity, autonomy, and local governance.
		Frequent use of phrases like "leave us alone," "we don't want this," and "not part of Plymouth."
Satisfaction with Current	22	Belief that current systems work well and do not need change.
Arrangements / Desire for No		Scepticism about the need for reorganisation.
Change		Concerns that change will bring disruption without clear benefits.
		Calls to "leave South Hams alone" and maintain the status quo.
General Distrust, Scepticism	21	Deep scepticism about the motives and benefits of reorganisation.
and Lack of Faith in the		Perception that the plan is ill-conceived and politically driven.
Process		Belief that it will benefit officials rather than communities.
		Frustration with lack of clear problem statement or justification.

November 2025 23

Answer / Theme	Count	Commentary
<b>Preference for Local Decision-</b>	18	Desire for decisions to remain with South Hams or local councils.
Making and Representation		Support for Parish and Town Councils having more influence.
		Frustration with boundary confusion and lack of accountability.
		Emphasis on rural voices being heard and respected.
Concerns About Council	13	Anxiety over potential increases in council tax and uncapped precepts.
Tax, Precepts and Financial		Lack of clarity around financial implications of reorganisation.
Transparency		Perception of a "stealth tax" and fears of paying more for fewer or less relevant services.
		Calls for clearer communication and justification of costs.
Environmental and Planning	10	Distrust in Plymouth's environmental record and planning decisions.
Concerns		Fears of overdevelopment, especially in rural and coastal areas.
		Desire to protect natural beauty, wildlife, and village character.
		Support for sustainable building practices and infrastructure planning.
Rural Identity and Way of Life	9	Strong desire to preserve the rural character and lifestyle of South Hams.
		Concerns that urban governance will erode rural values and traditions.
		Emphasis on understanding the unique needs of dispersed, small communities.
Efficiency, Value for Money and	7	Support for streamlining services and reducing waste.
Service Delivery		Desire for better budget management and spending decisions.
		Criticism of expensive schemes with little perceived benefit.
		Hope for more joined-up service delivery across borders.
Public Transport	3	Hope that reorganisation could lead to better transport links.
Improvements		Desire for more joined-up thinking across travel-to-work areas.
		Specific mentions of bus and taxi services needing improvement.
Healthcare and Social	3	Worries about merging with Plymouth affecting GP access and healthcare equity.
Services Concerns		Concerns about inconsistent support across boundaries (e.g., Devon Carers vs Plymouth services).
		Fear that rural healthcare will be deprioritised.

# What has been your experience of children's social care services in your local area - thinking about things like how approachable staff are, waiting times, quality of support provided, and communication with families?

Among those who have used children's social care services, experiences are evenly split between positive, neutral, and negative, suggesting a mixed picture of service delivery. While some families report high-quality support and approachable staff, others highlight issues with communication and waiting times else where in the survey. However, the vast majority of respondents (over 280) indicated they do not use these services, which reflects the demographic profile of survey respondents. Many participants are retired or not currently engaged with children's services.

Answer	Count
Very positive	12
Positive	12
Neither	13
Negative	12
Very negative	7
Don't use children's services	284



# How would you describe the quality of adult social care services where you live - considering factors like availability of advice and information, being able to contact someone, range of services offered, quality of care, and support for maintaining independence? (select one option)

Among those with experience of adult social care services, feedback is mixed, with a fairly even spread of positive, neutral, and negative responses. While some residents appreciate the quality of care and support for independence, others report issues with accessibility, communication, and service range, else where in the survey. However, the majority of respondents (over 250) do not use these services, reflecting the demographic profile of the survey and suggesting that broader engagement with service users is needed to fully understand strengths and areas for improvement.

Answer	Count
Very positive	16
Positive	28
Neither	18
Negative	21
Very negative	7
Don't use adult social care services	252

# What should be the top priorities when deciding what the future model of local government should be for Devon?

#### People were asked to rank with the most important at the top.

When asked to rank their top priorities for the future model of local government in Devon, respondents placed the highest value on councils that understand local issues and deliver high-quality services. Local decision-making was also a key concern, reflecting a strong desire for governance that is responsive and rooted in community needs. While some participants emphasised cost-saving and reducing bureaucracy, these were generally ranked lower than priorities focused on service quality, local representation, and planning.

Interestingly, climate change and sustainability – though selected by fewer respondents – was consistently ranked as a top priority by those who did choose it, suggesting a passionate minority with strong environmental concerns. Overall, the results highlight that residents want a model of local government that is efficient, locally informed, and capable of delivering meaningful services without losing sight of rural identity and long-term sustainability.

Priority	Understanding of local issues	High quality services	Local decision making	Supporting Local Businesses	Transport and infrastructure	Easy access to Councillors	Creating jobs and economic growth	Saving money	Reducing bureaucracy	Housing and planning	Climate change and sustainability	Council Offices Nearby
Count	89	108	46	6	20	2	5	8	3	5	17	1
	60	47	117	14	29	6	3	7	16	2	7	2
	77	51	59	29	19	13	13	8	13	8	13	7
	37	33	29	86	28	10	14	11	13	18	22	9
	22	21	18	63	23	70	29	10	21	17	13	3
	8	21	14	37	36	41	29	18	14	19	20	53
	5	16	11	27	24	28	82	12	26	27	26	26
	7	5	8	28	16	36	53	27	63	26	15	26
	4	4	7	14	9	29	44	78	57	22	10	32
	I	3	1	4	17	34	24	52	47	81	21	26
		I		I	76	32	10	46	29	51	11	52
					13					34	135	73
Ranking	1	2	3	4	5	6	7	8	9	10	П	12

November 2025 **25** 



# Are there any other priorities which haven't been mentioned above, that you would like us to consider as part of our work to develop our final proposal for local government reorganisation?

This was an open question. However, the answers that people provided could be gathered together in a number of clear themes. Many respondents used this open question to reinforce strong opposition to being incorporated into Plymouth, with repeated calls to preserve South Hams' autonomy and rural identity. There was also a clear desire for greater clarity around which council is responsible for which services, and for maintaining the current structure of South Hams District Council. Environmental protection and safeguarding the rural character of the area were recurring themes, alongside calls for improved access to services and infrastructure – particularly transport, healthcare, and waste facilities. These responses underline the importance of transparency, local control, and protecting what residents value most about their communities.

Themes	Count
Strong opposition to being incorporated into Plymouth	52
Clearer who is responsible	33
Remain as South Hams	28
Environmental protection and rural character	25
Greater access to services and infrastructure e.g. better transport links, road maintenance, and access to essential services like libraries, healthcare, and waste facilities.	21
More accessible services e.g. family hubs / adult social care	I

#### How would you like your local authority to engage with you in the future?

Participants could select multiple options for this. However, it is clear that the most popular route is through their local parish council, closely followed by email communication.

Answer	Count	Percentage
Through my local parish council	140	26.42%
Email communication	135	25.47%
Through regular communication, consultation and engagement activity	124	23.40%
Through my local ward councillor	73	13.77%
Through local groups and organisations	58	10.94%
Grand total who responded to this question		

#### **South Hams Big Community Conversation events**

Between June and July 2025, Plymouth City Council held 13 facilitated conversation events across the South Hams parishes proposed for inclusion in the Plymouth Growth Area. These sessions were led by Council staff trained in facilitation techniques, including Trauma-Informed approaches and Appreciative Inquiry, to ensure respectful, inclusive, and constructive dialogue. Held in accessible community venues, the events encouraged open and anonymous participation, allowing residents to share their views freely. The feedback gathered has been thematically analysed and plays a key role in shaping the final proposal





#### Question I: How do you think LGR will impact you and/or your community?

Across all parish engagement events, participants voiced a wide range of concerns about the potential impact of Local Government Reorganisation, with consistent themes emerging across the South Hams. There was a strong and heartfelt emphasis on the importance of parish councils in preserving rural identity, ensuring local representation, and maintaining community cohesion. Many residents expressed scepticism about the proposed changes, fearing a shift toward urbancentric governance that might overlook the distinct needs of rural communities. Concerns were raised about the quality and funding of services, increased planning and development pressures, and a perceived lack of trust in Plymouth City Council's ability to manage rural priorities effectively. Additionally, the engagement highlighted widespread confusion about the current two-tier system of local government. Many participants conflated the roles of parish, district, and county councils, often attributing responsibilities incorrectly. This underscores the need for clearer communication about existing governance structures and any proposed changes, to ensure residents feel informed, reassured, and genuinely represented.

#### Common themes across all 13 parishes

Representation and governance	<ul> <li>Fear of diluted rural voice: Many parishes worried that decisions would be dominated by urban councillors, with rural concerns sidelined.</li> <li>Loss of local knowledge: Concerns that existing councillors and staff with deep local understanding would be replaced or marginalised.</li> <li>Democratic deficit: Repeated mention of the imbalance in councillor numbers (e.g. 10 councillors for 13 parishes) and fears of being outvoted.</li> <li>Concern about the role and impact on Parish Councils</li> </ul>
Planning and development	<ul> <li>Urban sprawl: Strong opposition to increased housing developments, especially if driven by Plymouth's needs.</li> <li>Loss of green space: Many feared that rural landscapes would be sacrificed for urban expansion.</li> <li>Infrastructure strain: Worries that roads, schools, and health services are already stretched and would worsen under LGR.</li> </ul>
Financial concerns	<ul> <li>Council Tax (CT) disparities: Questions about whether CT would rise or be harmonised, and whether rural areas would subsidise urban ones.</li> <li>Funding allocation: Fears that money raised in rural areas would be spent in Plymouth.</li> <li>Debt inheritance: Concerns about taking on Plymouth's financial liabilities.</li> </ul>
Services and infrastructure	<ul> <li>Waste and recycling: Many praised current SH services and feared they would decline under PCC.</li> <li>Transport: Poor public transport was a recurring issue, with hopes that LGR might improve it – but scepticism prevailed.</li> <li>Health and social care: Concerns about current access, especially for elderly and SEND populations.</li> <li>Lack of understanding about which council currently provides which services.</li> </ul>
Identity and community	<ul> <li>Loss of rural character: Strong emotional attachment to village life and fear of becoming "just another suburb."</li> <li>Community cohesion: Many felt their communities were tight-knit and self-sufficient, and worried LGR would disrupt this.</li> </ul>

# Area-specific feedback (that were not a strong theme in the other areas) Bickleigh

- Concerns about Woolwell urban extension and dual carriageway construction.
- Specific issues with cross-boundary services (Devon vs Plymouth).

#### Cornwood

- Unique concerns about mineral rights and planning around mines.
- Strong preference for one unitary authority across the whole of Devon but not to include Plymouth.

#### **Harford**

- Desire for health hub in lvybridge.
- Specific mention of Dartmoor National Park planning authority.

#### **Shaugh Prior**

- Mining operations and renewable energy planning.
- Concerns about Dartmoor planning jurisdiction and identity.

November 2025 27

#### **Sparkwell**

- Tungsten mine and its impact on roads and environment.
- Strong distrust of Plymouth City Council due to past planning and environmental decisions.

#### **Yealmpton**

- Concerns about sewage infrastructure and beach pollution.
- Strong emphasis on maintaining rural peace and safety.

#### Contradictions or differing views between areas

**Ivybridge vs Smaller Parishes:** Ivybridge showed mixed feelings, with some seeing potential benefits in better services and representation, while smaller parishes were overwhelmingly negative.

Waste Services: Some parishes praised South Ham's recycling system; others preferred Plymouth's simpler approach.

**Transport:** While most parishes criticised poor public transport, a few (e.g. lvybridge) noted good train access and ring and ride services.

**Planning:** Some areas (e.g. Yealmpton) feared overdevelopment, while others (e.g. Sparkwell) were more focused on protecting specific assets like mines or greenbelt.

#### Question 2: What is good about the area where you live?

Residents across the South Hams parishes expressed deep appreciation for their communities, highlighting a strong sense of rural identity, natural beauty, and social cohesion. The responses were overwhelmingly positive, with many describing their areas as peaceful, safe, and well-connected to nature. There was a clear pride in local amenities, community spirit, and the quality of life afforded by living in these rural settings.

#### Common themes across all 13 parishes

Natural environment and rural identity	<ul> <li>Scenic beauty: Dartmoor, coastlines, estuaries, green spaces, and wildlife were frequently mentioned.</li> <li>Peace and quiet: Many valued the tranquillity and low noise levels compared to urban areas.</li> <li>Rural character: Residents felt strongly about maintaining their countryside lifestyle and resisting urbanisation.</li> </ul>
Community spirit and social cohesion	<ul> <li>Close-knit communities: People described knowing their neighbours, helping each other, and feeling safe.</li> <li>Local events: Village fairs, pantomimes, remembrance services, and seasonal celebrations were cherished.</li> <li>Volunteering and clubs: WI, gardening clubs, sports teams, and youth groups were seen as vital to community life.</li> </ul>
Local services and amenities	<ul> <li>Health services: Local GP surgeries and pharmacies were praised, especially where they were responsive and accessible.</li> <li>Schools: Primary schools were frequently mentioned as excellent and central to village life.</li> <li>Waste and recycling: Many appreciated the current waste collection systems, especially food and garden waste services.</li> </ul>
Accessibility and location	<ul> <li>Proximity to nature and urban centres: Many valued being close to Plymouth, Ivybridge, or the A38 while still enjoying rural life.</li> <li>Walking and cycling routes: Access to footpaths, moors, and coastlines was a major benefit.</li> <li>Transport links: Train stations, ring and ride services, and bus routes were appreciated where available.</li> </ul>
Local identity and pride	<ul> <li>Unique village character: Residents felt their areas had distinct identities worth preserving.</li> <li>Local governance: Parish councils were seen as effective and responsive, contributing to a sense of empowerment.</li> </ul>



# Area-specific feedback (that were not a strong theme in the other areas) Bickleigh

- Strong pride in Woolwell in Bloom and community centre awards.
- Emphasis on green space and nature on the doorstep.

#### Cornwood

- Historical significance of the village hall and American soldier mess hall.
- Oldest WI in Devon and strong interest in renewables.

#### Harford

- Lukesland and church community as central to social life.
- Ability to walk directly onto Dartmoor from home.

#### **Shaugh Prior**

- Mining heritage and community management of industrial impacts.
- Unique mix of industry and housing with strong local governance.

#### **Sparkwell**

- Dartmoor Zoo and parish hall as cultural anchors.
- Strong equestrian community and seasonal events like flower festivals.

#### **Yealmpton**

- Yealmpton Show and active community groups.
- Strong support from local landowners and vibrant village centre.

#### Contradictions or differing views between areas

**Urban proximity:** Ivybridge and Yealmpton appreciated being near Plymouth for services, while others (e.g. Sparkwell, Wembury) saw proximity as a threat to rural identity.

Waste services: Some praised SH's detailed recycling system; others preferred simpler systems like Plymouth's.

**Transport:** Ivybridge and Yealmpton noted good access; more remote parishes like Cornwood and Harford highlighted poor connectivity.

November 2025 29



#### Question 3: What do you really value about the services your current Council provides?

Residents across the South Hams parishes expressed strong appreciation for local council services, particularly those that are visible, responsive, and community-oriented. There was a clear emphasis on the value of waste collection, local governance, and access to health and education services. Many responses reflected a fear that these well-functioning services could be lost or diluted under Local Government Reorganisation. Often confusion as to which council provides which services.

#### Common themes across all 13 parishes

Waste and recycling Services	<ul> <li>Highly valued: Weekly or fortnightly collections, food and garden waste services, and responsive bin replacement.</li> </ul>
	<ul> <li>Concerns about change: Many feared losing the current system, especially where South Hams was seen as better than Plymouth City Council.</li> </ul>
Health and social care	Local GP surgeries and pharmacies: Praised for accessibility and responsiveness.
	<ul> <li>Adult and children's social care: Devon's provision was often seen as good, with concerns about how it would be managed under Plymouth City Council.</li> </ul>
<b>Education and school</b>	Primary schools: Frequently mentioned as excellent and central to community life.
transport	School buses: Valued especially in more rural areas where walking isn't feasible.
Infrastructure and	Road repairs and gritting: Appreciated where done well, though patchiness and delays were noted.
maintenance	Drainage and fly-tipping: Some parishes highlighted proactive responses from SH.
<b>Local Governance</b>	Parish councils: Seen as responsive, accessible, and deeply embedded in the community.
and communication	District councillors: Praised for attending meetings and resolving issues quickly.
	<ul> <li>Direct contact: Residents valued being able to speak to someone locally rather than navigating complex systems.</li> </ul>
Community facilities	Libraries, leisure centres, and youth clubs: Frequently cited as important and well-used.
and services	Community centres and village halls: Central to social life and often supported by the council.

#### Area-specific feedback (that were not a strong theme in the other areas)

#### Cornwood

- Recycling shop and quick bin replacement.
- Concerns about losing funding for the local shop.

#### **Ermington**

- Ivybridge police hub and SEND school opening.
- Strong praise for lyybridge waste recycling.

#### Harford

- Better relationship with Devon County Council than South Hams due to specific officers.
- Recycling issues when contracted out, later resolved.

#### **Sparkwell**

- Praise for proactive district councillors and bin collection.
- Concerns about mining impacts and environmental health.

#### **Yealmptor**

- South Ham's handling of Anti Social Behaviour and dog mess.
- Youth club funded by parish council.

#### Contradictions or differing views between parishes

**Waste services:** Some parishes (e.g. lvybridge, Yealmpton) praised SH's detailed recycling system, while others (e.g. Sparkwell) preferred simpler systems like Plymouth City Council's.

**Health services:** Mixed reviews – some found local surgeries excellent, others struggled with access and appointments.

**Council responsiveness:** While many praised South Hams and Devon County Council for being accessible, a few noted difficulties in contacting the council or getting timely responses.



## Question 4: What is not so great (about the area in question) and what would you like to see changed, including Council services?

Residents across the parishes identified a range of local challenges, with many expressing frustration over infrastructure, transport, planning, and access to services. There was a strong desire for better communication, more responsive governance, and improved facilities, especially for young people and the elderly. Concerns about overdevelopment, loss of rural character, and insufficient investment in local amenities were widespread.

### Common themes across all 13 parishes

Infrastructure and roads	<ul> <li>Potholes and poor road surfaces: A near-universal complaint, especially in rural areas affected by heavy vehicles or mining.</li> </ul>
	Drainage and flooding: Several parishes reported blocked drains and waterlogging.
	Street lighting and signage: Requests for better lighting and clearer road signs.
Transport and	• Limited public transport: Many areas suffer from infrequent or non-existent bus services, especially on
connectivity	Sundays.
	<ul> <li>School transport: Concerns about accessibility and safety for children.</li> </ul>
	• Cycle lanes: Poor maintenance and underuse were noted, with calls for better upkeep and promotion.
Planning and	• Overdevelopment fears: Strong opposition to new housing developments, especially where infrastructure
development	is lacking.
	<ul> <li>Loss of green space: Concerns about urban sprawl and environmental degradation.</li> </ul>
	Sherford cited frequently: As an example of poor planning and pressure on services.
Health and social	GP and hospital access: Long waits, limited facilities, and lack of local provision were common issues.
services	• SEND and elderly care: Worries about service quality and accessibility, especially under a larger authority.
Safety and policing	Lack of police presence: Many felt their communities were underserved.
	<ul> <li>Speeding and traffic safety: Calls for better enforcement and safer road design.</li> </ul>
Youth and	• Few activities for young people: Requests for youth clubs, sports facilities, and evening entertainment.
community services	Community centres and parks: Need for upgrades and better maintenance.
Waste and	Fly-tipping: Linked to restrictive tip access and lack of enforcement.
recycling	Bin collection: Desire for simpler systems and more frequent pickups.

## Area-specific feedback (that were not a strong theme in the other areas)

## **Bickleigh**

- Concerns about dual carriageway construction and Woolwell development.
- Lack of secondary schools and poor infrastructure planning.

#### Cornwood

- No village shop and sparse bus service.
- Fears of becoming like Plympton or Plymstock.

### Harford

• Ivybridge health facilities lacking; frequent power cuts and poor mobile signal.

#### **Shaugh Prior**

- Mining impacts on roads and planning.
- Renewable energy concerns and lack of clarity on Dartmoor planning jurisdiction.

#### Sparkwell

- Heavy traffic from the mine and poor road conditions.
- Fears of becoming a suburb of Plymouth.

### **Yealmpton**

- Sherford development pressure and lack of safe cycling routes.
- Concerns about Anti Social Behaviour and youth safety.

### Contradictions or differing views between parishes

**Transport:** Ivybridge and Yealmpton noted some good services, while others (e.g. Cornwood, Sparkwell) reported severe limitations.

Waste services: Some praised Soth Ham's system; others found it overly complex and preferred Plymouth's approach.

**Planning:** While most opposed further development, a few saw potential for growth if infrastructure matched.

November 2025

## Question 5: How would you like your Local Authority to engage with you in the future?

Across the parishes, residents expressed a strong desire for meaningful, transparent, and accessible engagement with their Local Authority. There was a clear preference for face-to-face communication, localised meetings, and ongoing dialogue – especially in light of the proposed changes under Local Government Reorganisation. Many felt that current engagement was insufficient and wanted to ensure their voices would be heard and respected in future decision-making.

### Common themes across all 13 parishes

Communication	• Face-to-face engagement: Strong preference for in-person meetings, drop-in sessions, and local surgeries.
channels	• Digital and traditional media: Use of email, social media, newsletters, and parish magazines was encouraged, but with recognition of digital exclusion.
	• Printed materials: Posters, flyers, and hard copies in community hubs and libraries were seen as essential for reaching all demographics.
Localised representation	<ul> <li>Parish councils: Seen as vital conduits for communication; residents want them to remain empowered and involved.</li> </ul>
	<ul> <li>Councillor visibility: Requests for councillors to attend parish meetings regularly and be accessible to residents.</li> </ul>
	<ul> <li>Local knowledge: Emphasis on the importance of representatives understanding the specific needs of rural communities.</li> </ul>
Transparency	Clear information: Residents want clarity on proposals, impacts, and timelines.
and responsiveness	• Timely responses: Frustration with slow replies from councils, especially around planning and service queries.
responsiveness	• Consultation before decisions: Strong opposition to "tick-box" exercises; people want genuine involvement before changes are made.
Inclusive	• Digital exclusion concerns: Many noted that elderly or rural residents may not use online platforms.
engagement	<ul> <li>Accessible formats: Calls for large print, physical noticeboards, and inclusive venues.</li> </ul>
	<ul> <li>Community-led engagement: Suggestions to use local events, pubs, and community centres as engagement points.</li> </ul>

## Area-specific feedback (that were not a strong theme in the other areas)

### Harford

- Wants council meetings held locally, not just in Plymouth.
- Emphasis on equal representation and justification when decisions differ from community views.

### **Shaugh Prior**

- Interest in citizen panels and feedback boxes.
- Engagement during popular parish events and through local pubs.

### **Sparkwell**

- Strong emphasis on transparency and trust-building.
- Specific concerns about the mine and desire for ongoing dialogue with environmental health officers.

### **Y**ealmpton

- Requests for regular meetings and better telephone access.
- Emphasis on maintaining visibility of councillors and safeguarding local identity.

### Contradictions or differing views between parishes

**Digital vs. physical communication:** Some parishes embraced email and social media, while others stressed the need for printed materials due to digital exclusion.

**Engagement satisfaction:** Ivybridge appreciated early engagement on LGR, while others (e.g. Sparkwell, Wembury) felt the process had been poorly advertised or underhanded.

**Preferred venues:** While some suggested formal settings like community centres, others preferred informal spaces like pubs or local events.



## **PLYMOUTH SURVEY (DEMOGRAPHIC ANALYSIS)**



The following section presents the demographic information that was collected from respondents to the full survey. The survey recorded key demographic data that aids the project team's understanding of who took part in the engagement exercise. Demographic data was collected in an optional personal information section of the survey.

It is important to note that none of the below questions were compulsory.

## Age

The table below demonstrates a wide range of respondents from different age groups, reflecting a diverse demographic profile. The largest proportions of respondents are in the 55–64 and 65–74 age brackets, each representing 19.71% of the total. This suggests strong engagement from older adults.

Age	Count	Percentage
Not given	101	23.99%
16-19	2	0.48%
20-24	3	0.71%
25-34	17	4.04%
35-44	36	8.55%
45-54	54	12.83%
55-64	83	19.71%
65-74	83	19.71%
75-84	39	9.26%
85+	0	0.00%
Prefer not to say	3	0.71%
Grand total	421	

### Work status

The table below outlines the employment status of survey participants. Among those who responded, the largest group – 33.97% – reported working full time, indicating strong representation from the employed population. A significant proportion, 39.90%, identified as retired, reflecting notable engagement from older individuals no longer in the workforce. Additionally, 14.73% reported working part time, while smaller percentages were in education or seeking employment.

Work status	Count	Percentage
No answer	20	4.75%
In full-time education	3	0.71%
In part-time education	I	0.24%
Not in employment	19	4.51%
Not in employment but actively looking	5	1.19%
Retired	168	39.90%
Working full time	143	33.97%
Working part time	62	14.73%
Grand Total	421	

### Care experience

Plymouth City Council recognises that care experience is an additional protective characteristic. Of those who answered the question, I5 people stated that they have experience of the children's social care system.

Care experience?	Count	Percentage
No answer	244	57.96%
No	153	36.34%
Prefer not to say	9	2.14%
Yes	15	3.56%
Grand Total	421	

### **Armed Forces**

As part of our commitment to the Armed Forces, Plymouth City Council asks people if they currently or have previously served in the Armed Forces. Of those who answered the question 40 have served, or are currently serving in the Armed Forces.

Armed Forces	Count	Percentage
No answer	99	23.52%
No	273	64.85%
Prefer not to say	9	2.14%
Yes, in regular armed forces	36	8.55%
Yes, in reserve armed forces	4	0.95%
<b>Grand Total</b>	421	

#### Sex

We asked all participants what their sex at birth.

Sex	Count	Percentage
Female	177	42.04%
Male	132	31.35%
Prefer not to say	17	4.04%
No answer	95	22.57%
Grand Total	421	

### **Gender**

We asked all participants if their gender identity is the same as the sex they were registered with at birth.

Gender	Count	Percentage
Yes	305	72.45%
No	3	0.71%
Prefer not to say	14	3.33%
No answer	99	23.52%
Grand Total	421	

## **Disability**

We asked all participants if day-to-day activities are limited due to a health problem or disability expected to last 12+ months.

Disability	Count	Percentage
Yes, limited a lot	27	6.41%
Yes, limited a little	77	18.29%
Prefer not to say	21	4.99%
No	196	46.56%
No answer	100	23.75%
Grand Total	421	

### **Ethnicity**

We asked all participants to define their ethnicity.

Ethnicity	Count	Percentage
White	290	68.88%
Prefer not to say	12	2.85%
Other (not stated)	4	0.95%
Mixed or multiple ethnic groups	3	0.71%
Asian or Asian British	3	0.71%
Black, Black British, Caribbean or African	I	0.24%
No answer	108	25.65%
Grand Total	421	



## Plymouth survey key LGR questions (Online and Paper)

The total number of responses to the full survey by close was 403. The following section sets out the full analysis. Any demonstrable differences in findings by respondent type are stated within the commentary for those questions.

Qualitative data has been coded for themes, and one response may contain multiple themes. This means that the number of themes mentioned in a thematic table may exceed the number of responses to that question.

Responses in this section include feedback received from the online and paper survey.

Again, none of these questions were compulsory.

### Where is your work or education based?

The responses highlight Plymouth's dominant role as a centre for work and education, with nearly a quarter of participants based there. This suggests strong local engagement and a concentration of institutions and employers in the city.

The presence of remote working and international/UK-wide roles reflects evolving work patterns, especially post-pandemic, and points to a more flexible, dispersed workforce.

Smaller clusters like Derriford, City Centre, and surrounding areas such as South Devon and Plympton show that while Plymouth is central, the wider region also contributes meaningfully to the local economy and education landscape.

Answer	Count	Additional commentary provided
Plymouth	100	<ul> <li>This is by far the most common response, reflecting Plymouth's central role in the region's work and education landscape. Responses include specific locations like Ballard House, City College, and various neighbourhoods (e.g., Crownhill, Estover, Stoke). It also includes broader mentions like "Plymouth and surrounding area" and "Plymouth University," showing a strong local identity and concentration of institutions.</li> </ul>
Other	48	<ul> <li>This group includes unique or less frequent responses that don't fit neatly into other categories lt includes specific buildings, job titles, and niche locations.</li> </ul>
Home/remote working	20	<ul> <li>This group reflects the shift toward flexible and remote working arrangements. Many responses simply state "home," while others mention hybrid setups or working from home internationally. This trend is consistent with post-pandemic work culture.</li> </ul>
City Centre	9	• These responses specifically mention Plymouth's city centre, indicating a hub for business, education, and public services. The repetition of "City Centre" shows its prominence as a workplace location.
Derriford	7	<ul> <li>Derriford is another key employment area, especially for healthcare and business. Responses include Derriford Hospital and business parks, highlighting its role in public services and corporate activity.</li> </ul>
South Devon	6	<ul> <li>This group includes towns like Ashburton, Bovey Tracey, Dartmouth, Dartington, and Torbay.</li> <li>These responses reflect rural and semi-urban work or education settings, possibly linked to arts, education, or local services.</li> </ul>
Plympton	5	<ul> <li>Plympton responses reflect residential and educational settings, with mentions of schools and broader community areas.</li> </ul>
International/UK wide	5	<ul> <li>These responses reflect roles with a broader geographic scope, including global consultancy and UK-wide operations. They highlight the reach of some professionals beyond the South West.</li> </ul>
Crownhill	4	<ul> <li>Crownhill appears as a smaller but notable cluster, likely reflecting residential and educational institutions in the area.</li> </ul>
Plymstock	4	<ul> <li>Plymstock is another residential area with educational and community ties. It's part of the wider Plymouth urban area.</li> </ul>
Devonport	4	<ul> <li>Devonport responses suggest ties to naval, educational, and community services. It's a historically significant area with ongoing relevance.</li> </ul>
Cornwall / Devon	4	<ul> <li>Includes places like Saltash, Tavistock, and South Hams. These are close to Plymouth and may represent commuter zones or regional service areas.</li> </ul>
Estover	2	<ul> <li>Estover is mentioned in relation to business parks and volunteer work, indicating a mix of commercial and community engagement.</li> </ul>
Exeter	I	• Only one direct mention of Exeter, suggesting limited representation from this city despite its regional importance.

## Where do you do most of your shopping?

The data shows that Plymouth is the dominant shopping location, with most respondents identifying it as their primary area – highlighting the city's strong retail presence and local identity. The City Centre also stands out as a key destination, valued for its variety and convenience.

A notable number of respondents shop online, reflecting a shift toward digital retail, likely driven by convenience and accessibility. Suburban areas like Plymstock and Plympton are well-represented, showing the importance of local retail hubs.

Smaller clusters such as Derriford, Saltash, and Mutley point to more community-focused shopping habits, while out-of-town retail parks attract shoppers seeking specific stores or easier access.

Overall, the responses reveal a diverse mix of shopping behaviours, balancing city centre convenience, local loyalty, and digital flexibility. This suggests that retail strategies should consider both central and neighbourhood-based approaches, as well as the growing role of online platforms.

Answer	Count	Additional commentary provided
Plymouth	139	<ul> <li>This dominant group includes general mentions of Plymouth without specifying a shop or area. It reflects a strong local identity and suggests that many respondents shop broadly across the city.</li> </ul>
City Centre Shopping	40	<ul> <li>With responses referencing locations like Armada Centre, Drake Circus, Union Street, and the broader Plymouth city centre, it's clear that the heart of the city remains a vital shopping destination. These responses reflect a preference for the convenience and variety offered by central retail hubs, where high street stores, department chains, and independent outlets converge. The city centre is not just a place to shop – it's a social and cultural focal point for many residents.</li> </ul>
Online Shopping	49	<ul> <li>A significant number of respondents indicated that they shop online, using platforms like Amazon or general internet retailers. This trend highlights the growing reliance on digital convenience, especially for non-grocery items or when time and accessibility are factors.</li> </ul>
Plymstock	19	<ul> <li>Plymstock emerged as a popular shopping area, pointing to locations such as Broadway and Marsh Mills. These responses suggest a blend of local and out-of-town shopping habits, where residents enjoy the accessibility of nearby retail parks while still supporting community-based stores. The area's mix of supermarkets and high street shops makes it a versatile choice for everyday needs.</li> </ul>
Local Shops and Independent Retail	18	<ul> <li>Responses referenced shopping at local or independent outlets, including areas like Mutley Plain, Ridgeway, and charity shops. This theme reflects a strong community ethos, where shoppers value the personal touch, uniqueness, and ethical appeal of smaller businesses. These choices often go beyond convenience, representing a conscious decision to support local economies and sustainable retail practices.</li> </ul>
Plympton	18	<ul> <li>Plympton stands out as a well-supported suburb for shopping. Respondents likely frequent Ridgeway and other local centres, showing a preference for familiar, accessible retail environments. The area's mix of supermarkets and independent shops caters well to residents who value proximity and a sense of community in their shopping routines</li> </ul>
Out-of-Town Shopping	21	<ul> <li>Responses pointed to shopping destinations outside the immediate city, such as Lee Mill, Marsh Mills, Transit Way, Roborough, and Saltash. These locations are typically home to larger supermarkets and retail parks, suggesting that many shoppers are willing to travel for bulk purchases, better parking, or specific stores not found in the city centre. This pattern reflects a practical approach to shopping, often tied to weekly routines or family needs.</li> </ul>
Mixed / General Responses	10	<ul> <li>Respondents gave broad or non-specific answers, such as "a mix of supermarkets,"     "depends on what I'm buying," or "various places." These responses suggest flexible     shopping habits, where choices are driven by convenience, availability, or specific needs     rather than loyalty to a particular store or location. It reflects a pragmatic approach to     retail, shaped by circumstance rather than routine.</li> </ul>
Saltash	4	<ul> <li>Saltash represents a cross-border shopping option for those living near the Tamar. Its proximity to Plymouth makes it a convenient alternative, especially for those seeking specific stores or avoiding city centre congestion. These responses highlight the fluidity of regional shopping habits, where boundaries are less important than accessibility.</li> </ul>
Mutley	2	<ul> <li>Mutley Plain holds significance as a local high street with a mix of independent shops and supermarkets. It's a place where community and commerce intersect, offering a more personal shopping experience. These responses suggest that for some, shopping is as much about connection and familiarity as it is about products.</li> </ul>



## Where do you spend the most time socialising or taking part in cultural activities?

Answer	Count	Additional commentary provided
City Centre and waterfront	181	<ul> <li>Plymouth's city centre and waterfront areas – such as the Barbican, Hoe, and Central Park – remain the most popular destinations for social and cultural engagement. These locations offer a vibrant mix of leisure, heritage, and entertainment venues, making them central to the city's social life.</li> </ul>
Local suburbs	41	<ul> <li>Suburban areas like Plymstock, Plympton, Elburton, Ernesettle, Kingsbridge, Mutley Plain, and Ridgeway are popular for socialising. These reflect a strong connection to local community spaces, pubs, and green areas outside the city centre.</li> </ul>
Cultural venues	26	<ul> <li>Churches, pubs, gyms, theatres, and arts societies are important hubs for structured social and cultural activities – from worship and fitness to live performances and dining.</li> </ul>
Devon and Cornwall region	21	<ul> <li>Respondents indicated that they socialise across the wider Devon and Cornwall region. This reflects a regional lifestyle where cultural and social engagement extends beyond Plymouth's boundaries.</li> </ul>
Nature and outdoors	19	<ul> <li>Dartmoor, beaches, parks, and other natural settings continue to be highlighted as preferred places for socialising and cultural engagement. These areas offer tranquility and open space, appealing to those who enjoy outdoor recreation and informal gatherings.</li> </ul>
Home-based socialising	17	<ul> <li>A consistent number of people reported spending most of their social time at home.</li> <li>This reflects a preference for comfort, affordability, or necessity, with some combining home life with religious or family-based cultural activities</li> </ul>
Do not socialise / barriers	10	<ul> <li>A small but notable group expressed that they do not participate in social or cultural activities, often citing barriers such as time, affordability, or personal circumstances.</li> </ul>
Out-of-town or travel	5	<ul> <li>A few responses described travel-based socialising, including trips across the UK and Europe or following sports teams. These individuals engage with culture and community through mobility and exploration.</li> </ul>



# How do you hope that Local Government Reorganisation will impact you and/or your community?

The responses show that Plymouth's city centre and waterfront are the most popular areas for social and cultural engagement. This highlights the importance of spaces like the Barbican, Hoe, and Central Park as vibrant hubs for leisure and community life. Suburban areas such as Plymstock, Plympton, and Mutley Plain also play a key role, reflecting strong ties to local pubs, parks, and community venues. Cultural institutions – including churches, theatres, and gyms – are valued by many for structured activities. A notable number of respondents engage with nature and outdoor spaces like Dartmoor and local beaches, showing a preference for informal, open-air socialising. Others socialise at home, suggesting comfort, affordability, or accessibility as key factors. Smaller groups mentioned regional travel across Devon and Cornwall, or cited barriers to socialising, such as time or cost. Overall, the data reflects a diverse mix of social habits, shaped by geography, lifestyle, and personal circumstances.

Answer / Theme	Count	Commentary
Improved services	270	<ul> <li>Responses focus on tangible improvements in public services and infrastructure. Suggestions include better transport, cleaner environments, and more cohesive service delivery that meets everyday needs more effectively. The large number of responses indicates a strong public desire for practical, visible improvements in how services are delivered.</li> </ul>
Decisions that impact you will be made locally	135	<ul> <li>Responses highlight the importance of empowering local communities. People hope that reorganisation will bring decision-making closer to the community level, fostering more relevant and responsive governance that reflects local needs and priorities.</li> </ul>
Clearer who is responsible for what service	56	<ul> <li>Responses reflect a strong desire for transparency and accountability in local governance. Respondents want clearer delineation of responsibilities and better oversight of decision-making processes, ensuring that those in power are held to account.</li> </ul>
Other answers:		
Opposition or scepticism	40	<ul> <li>Responses capture scepticism or opposition to local government reorganisation.</li> <li>Respondents express concerns about the competence of current leadership, fear of negative impacts, and a general lack of confidence in proposed changes.</li> </ul>
Improved financial management	27	<ul> <li>These responses point to concerns about how public funds are managed.</li> <li>Respondents are calling for better prioritisation, reduced waste, and more efficient use of resources to ensure that public money delivers real value to communities.</li> </ul>
Public engagement and communication	19	<ul> <li>These responses emphasise the need for better communication between local government and residents. People want to be consulted and informed before decisions are made, ensuring that governance is inclusive and transparent.</li> </ul>
Improved public voice and participation	4	<ul> <li>Respondents highlighted the need for greater public involvement in decision- making, including calls for consultation and democratic leadership selection.</li> <li>These views emphasise the importance of inclusive governance.</li> </ul>
Efficiency and reform	2	<ul> <li>Respondents called for more efficient governance, reduced bureaucracy, and coherent policy implementation. These views suggest frustration with current administrative processes.</li> </ul>



# Imagine it's 2050 – what five words or short phrases would you use to describe the Plymouth you'd love to live, work or be educated in?

The responses paint a clear and aspirational vision for Plymouth's future. Safety and green, sustainable living top the list, showing a strong desire for a city that is both secure and environmentally responsible. People want clean air, accessible green spaces, and a community where safety is built into everyday life.

Themes of community and inclusivity reflect a longing for a city that welcomes everyone, supports wellbeing, and fosters civic pride. Culture and heritage remain central, with calls for vibrant arts, events, and preservation of Plymouth's unique identity. Improved transport and connectivity, affordable housing, and economic opportunity are also key priorities, alongside better healthcare, education, and governance. Together, these responses suggest a future Plymouth that is resilient, inclusive, and thriving – a place where people feel proud to live, work, and learn.

Answer / Theme	Count	Commentary
Green and sustainable living	122	Respondents overwhelmingly envision a greener Plymouth — one that is clean, biodiverse, and environmentally responsible. There is a strong desire for more trees, green spaces, and nature woven into the urban fabric. Sustainability is a recurring aspiration, with calls for carbon neutrality, clean air, and eco-conscious infrastructure. People want a city that not only looks green but lives green — through active travel, renewable energy, and environmental stewardship.  Examples:  "Green, clean, connected, welcoming, thriving"  "Cleaner! Much cleaner! A centre to be proud of!"  "Greenery. More accessible and frequent bus services. Local businesses."  "Green, safe, vibrant, social care thriving, improved sustainably led infrastructure"  "Trees everywhere, affordable homes"
Safety and crime prevention	144	Safety is one of the most frequently mentioned priorities. Respondents want a city where people feel secure in their homes, streets, and public spaces. This includes visible and approachable policing, low crime rates, and protection for vulnerable groups. Safety is also linked to cleanliness, lighting, and the design of public areas. Many envision a Plymouth where safety is a shared community value, not just a policing issue.  Examples:  "Safe, clean, vibrant, successful, very low crime rate."  "Safe place to live, lowest crime rate nationwide and community police approachable"  "Safe, inclusive, healthy with a road network designed to reduce illegal speeding"  "No drugs or addicts. Better connected (airport). Prosperous"  "Safe, clear, friendly, green, accessible."
Community and inclusivity	108	A strong, inclusive community is at the heart of many people's vision for Plymouth. Respondents want a city where everyone feels welcome, supported, and able to thrive – regardless of age, background, or ability. There's a desire for intergenerational connection, civic pride, and a culture of mutual care. Community-led initiatives, social cohesion, and inclusive design are seen as essential to a thriving future.  Examples:  "Community led, vibrant, healthy population, good standard of living for all"  "Inclusive, caring, vibrant, thriving, diverse"  "Community orientated. Young people focused. Social activities"  "Vibrant multi cultural thriving community with ample opportunities"  "Everyone is valued. Everyone is cared for."
Culture and heritage	94	Plymouth's cultural identity and heritage are deeply valued. Respondents want to see the city celebrate its maritime history, invest in the arts, and become a destination for creativity and cultural experiences. There's a strong call for more events, music, theatre, and public art, as well as the preservation of historic buildings and spaces. Culture is seen as a source of pride, tourism, and community connection.  Examples:  "Valued and recognised heritage dockyard, 20th century buildings, Hoe"  "A dynamic arts and cultural city"  "Keep live entertainment, poetry and art and music, and look after nature."  "Leading city for arts and culture"  "Vibrantly cultural, fair, accessible and inclusive"

Answer / Theme	Count	Commentary
Transport and connectivity	84	Efficient, affordable, and sustainable transport is a top priority. Respondents want better public transport, improved road infrastructure, and the reopening of the airport. There's a desire for a city that is easy to navigate – on foot, by bike, or by bus – and well connected to the rest of the UK. Transport is seen as essential to economic growth, social inclusion, and environmental sustainability. Examples:  • "Transport links. Airport open"  • "Excellent public transport befitting a city meaning cars are rarely needed"  • "Better transport out of town. Lower parking price"  • "Transport-hub connections community business destination-shopping"  • "More cycle paths, much better bus services, more free busses"
Housing and urban development	78	People want a city that is clean, well-maintained, and thoughtfully developed. Affordable housing, revitalised neighbourhoods, and vibrant city centres are key aspirations. Respondents call for fewer empty shops, better public spaces, and more mixed-use developments. Maintenance of streets, pavements, and green areas is seen as essential to civic pride and quality of life.  Examples:  "Affordable housing for people born in the city"  "Well kept parks, roads, pavements, grass cut and trees maintained."  "Cleaner streets free of litter, no fly tipping"  "Lively city centre with plenty of new homes and people"  "No empty shops in town centre"
Economic growth and business	66	A thriving economy is central to the vision for Plymouth. Respondents want more high-quality jobs, support for local businesses, and investment in innovation. Economic growth is closely tied to education, infrastructure, and housing. Many envision Plymouth as a place where people can build careers, start businesses, and enjoy financial stability.  Examples:  "Economically vibrant, scenic and a pleasure to live in"  "Open for business, culture rich, community led"  "Strong economy. Good services. Shops. Public transport. Cycling links"  "Financially stable, well equipped and well maintained"  "More good shops"
Accessibility and infrastructure	64	Accessibility is about more than physical access—it's about equity, inclusion, and ease of living. Respondents want well-maintained infrastructure, accessible services, and inclusive design. This includes everything from public transport and digital access to clean streets and well-lit paths. Infrastructure is seen as the backbone of a fair and functional city.  Examples:  "Accessible well maintained biodiverse green spaces for all"  "Better transport systems. Make better use of the Hoe and Plymouth Sound"  "Accessible, tolerant, clean, vibrant, inclusive"  "Where everyone's overall wellbeing needs are met (stopping littering is one of them)"  "Infrastructure actually cleaned, maintained and invested."
Healthcare and Social Care	54	Health and wellbeing are seen as fundamental to a good life in Plymouth. Respondents want better NHS services, more support for the elderly and vulnerable, and improved mental health care. There's a strong desire for a system that is accessible, responsive, and preventative—one that supports people to live well at every stage of life.  Examples:  "Hospitals where you don't wait to near death before you're attended to"  "Safe place to live. Good access to healthcare. Help for those who need it"  "Well cared for spaces good social care"  "Excellent health services funded police services"

Answer / Theme	Count	Commentary
Education and opportunities	47	Education is seen as a pathway to opportunity and a cornerstone of a thriving city. Respondents want high-quality schools, accessible lifelong learning, and strong links between education and employment. There's a desire for a city where young people can succeed without needing to leave, and where education is inclusive and future-focused.  Examples:
		<ul> <li>"Reputation for excellent education – at all levels"</li> <li>"Good schools. Low crime"</li> <li>"Schools accountable to LA not run by trusts"</li> <li>"Educational powerhouse, welcoming place to visit"</li> <li>"Equal access to quality education across the city"</li> </ul>
Governance and civic engagement	26	People want a council that listens, leads with integrity, and puts residents first. There's a call for more transparency, better consultation, and leadership that reflects the city's diversity and ambition. Respondents want to feel heard, respected, and involved in shaping Plymouth's future. Examples:  • "Council that listens"  • "More accountability by the council"  • "Well managed, caring, efficient. Schools back under LA control"
		"To go back to what the town looked like before the council decided to change it"

# What one thing would you most like to see change about your local neighbourhood?

The most common concern among respondents is the cleanliness and upkeep of public spaces, with residents calling for cleaner streets and better waste management. This reflects a strong desire for improved civic maintenance and pride in local environments.

Transport and connectivity also emerged as a key theme, with calls for better public transport, new infrastructure, and improved access across the city and region. Safety and policing followed closely, highlighting concerns about antisocial behaviour and the need for more visible community protection. Respondents also expressed a desire for more green spaces and better maintenance of existing ones, alongside improved access to healthcare and education, and affordable housing, pointing to broader issues of wellbeing and inclusion. Smaller but meaningful themes included support for local shops and services, activities for young people, and accessibility for disabled residents. These responses show that while priorities vary, there is a shared vision for neighbourhoods that are cleaner, safer, better connected, and more inclusive.

Answer / Theme	Count	Commentary
More affordable housing	30	Concerns about affordability, overcrowding, and the need for more social housing and better housing stock.  Sample items:
		<ul> <li>Less HMOs / multi occupancy houses</li> <li>Less overcrowding, being able to park near your house</li> <li>More affordable housing</li> </ul>
Better public transport or connectivity	47	Strong interest in improving transport infrastructure, including rail, airport access, and overall connectivity.  Sample items:  A new railway station at Plympton  An airport and technological connectivity  Better public transport or connectivity
Improved safety and policing	44	Concerns about antisocial behaviour, drug control, and the need for stronger policing and safety measures.  Sample items:  Better control of drugs Heavy clampdown on antisocial behaviour Improved safety and policing

November 2025

		1 ago 200
Answer / Theme	Count	Commentary
Cleaner streets and better waste management	62	A dominant theme, with widespread concern about street cleanliness, waste management, and general upkeep of public spaces.  Sample items:  Better kept verges and streets  Cleaner streets and better waste management  Cleaner streets and better waste management
More green spaces or better maintenance of existing ones	44	A clear desire for more green spaces and better maintenance of existing ones, reflecting environmental and wellbeing priorities.  Sample items:  Independent cafes, shops and parks  More green spaces or better maintenance of existing ones  More green spaces or better maintenance of existing ones
More local shops, cafes or services	21	Interest in enhancing local retail options, including shops, cafés, and city centre experiences.  Sample items:  Better higher standard of shopping in the city centre  Better shops on Albert Road  More local shops, cafés, or services
Better access to healthcare or education	37	Calls for improved access to healthcare services, especially NHS dental care, and better educational opportunities.  Sample items:  Access an NHS dentist  Better access to healthcare or education  Better access to healthcare or education
More activities for young people or families	20	Desire for more recreational and social opportunities for young people and families.
Improvements accessibility for people with disabilities	13	Feedback highlights the need for better accessibility for disabled people and improved parking options.
OTHER		
Active travel  Urban Planning	3	Support for safer cycling infrastructure and active travel options.  Sample items:  Better Active Travel provision  Improved infrastructure for active travel especially cycling  Safer cycle routes and traffic calming  Calls for better road planning, pothole repairs, and infrastructure investment.
and Infrastructure		Sample items:  Better planning on roads and developments  Better roads  Potholes fixed quickly



## Rank the top three things you love most about your local neighbourhood? People were asked to rank with the most important at the top.

In our local neighbourhood, the most cherished aspect is undoubtedly the access to green spaces and parks. With respondents placing it as their top choice, it's clear that the ability to enjoy nature, unwind outdoors, and engage in recreational activities is a cornerstone of community life. Coming in second is the friendly and supportive community, reflecting the strong social bonds and neighbourly spirit that make the area feel welcoming and safe. The third most loved feature is the local shops and amenities, which not only provide convenience but also foster a sense of local identity and connection. Together, these top three elements paint a picture of a neighbourhood that values nature, community, and accessibility – making it a truly special place to live.

Count by position	Access to green spaces and parks	Friendly and supportive community	Local shops and amenities	Safety and low crime levels	Good public transport links	Clean and well- maintained environment	Access to schools and healthcare	Quiet and peaceful atmosphere
1	95	83	31	63	29	18	17	31
2	96	49	39	44	45	34	27	30
3	57	45	61	44	77	30	18	28
4	41	92	73	26	61	30	18	18
5	42	34	62	80	61	30	30	24
6	27	30	56	57	42	103	24	16
7	12	23	35	34	24	80	118	20
8	4	14	14	21	22	36	98	20
9	3	7	6	8	16	16	27	190
Overall Ranking	I	2	3	4	5	6	7	8

## What are the things you love most about Plymouth as a city?

People were asked to rank with the most important at the top.

Plymouth's most beloved feature is its access to the waterfront and stunning coastal views, with respondents ranking it as their top choice. The city's connection to the sea clearly resonates deeply, offering both beauty and a sense of identity. In second place is Plymouth's proximity to nature, including Dartmoor and nearby beaches, which highlights the value residents place on outdoor exploration and natural escapes. The third most appreciated aspect is the city's green spaces and parks, providing peaceful retreats and recreational opportunities within the urban landscape. Together, these top three reflect Plymouth's unique blend of coastal charm, natural beauty, and accessible green spaces - making it a city that truly celebrates its environment.

Count by position	Access to the waterfront and coastal views	Proximity to nature (e.g. Dartmoor beaches)	Green spaces and parks	Rich maritime and cultural heritage	Vibrant arts events and festivals	Friendly and welcoming community	Access to education and universities	Good transport links and connectivity	Range of shops restaurants and cafés
1	176	60	10	15	4	16	2	4	6
2	61	136	32	14	9	16	5	8	5
3	22	39	58	82	32	24	3	13	15
4	19	27	31	75	60	28	8	21	16
5	5	13	29	42	67	72	21	21	14
6	6	8	22	21	44	62	15	72	26
7	2	7	18	16	30	36	14	73	32
8	1	0	8	7	23	18	36	37	86
9	1	1	12	10	15	17	89	23	82
Overall Ranking	I	2	3	4	5	6	7	8	9



## What would you most like to see change about Plymouth as a city?

People were asked to rank with the most important at the top.

The most desired change among respondents is the creation of more inclusive and accessible public spaces, with most people ranking it as their top priority. This reflects a strong community interest in making Plymouth more welcoming and usable for everyone, regardless of age, ability, or background. In second place is a call for improved road maintenance, highlighting concerns around infrastructure and everyday mobility. The third most requested change is the need for more affordable and diverse housing options, pointing to growing pressures around cost of living and housing availability. These priorities suggest a collective vision for a more equitable, functional, and liveable city.

Count by position	More inclusive and accessible public spaces	Improved road maintenance	More affordable and diverse housing options	Better public transport within and beyond the city	More job opportunities and support for local businesses	Improved cleanliness and waste management	Safer streets and reduced crime	Improved education
1	6	39	53	50	28	24	32	2
2	5	35	27	52	35	39	42	5
3	10	28	38	34	45	43	36	5
4	12	20	45	36	55	43	28	5
5	5	21	26	45	42	52	30	5
6	9	П	23	34	38	46	32	7
7	14	П	12	18	20	30	49	16
8	17	9	14	13	12	9	26	86
9	13	14	П	7	9	4	17	97
10	31	81	18	5	4	5	I	47
11	173	26	28	1	7	0	2	20
Overall Rank	I	2	3	4	5	6	7	8

## How can we plan for homes, jobs, and green spaces in a way that supports wellbeing? People were asked to rank with the most important at the top.

The top priority for supporting wellbeing in future planning is to build more affordable and energy-efficient homes, with most respondents ranking it first. This reflects a strong desire for housing that is both accessible and environmentally sustainable. Second on the list is the need to ensure new developments have good access to green space, highlighting the importance of nature in everyday life and mental health. The third most valued approach is to protect and enhance existing green spaces and natural habitats, showing a clear commitment to preserving Plymouth's environmental assets. These responses suggest that residents envision a city where housing, nature, and community wellbeing are thoughtfully integrated.

	Build more affordable and energy-efficient homes	Ensure new developments have good access to green space.	Involve communities in planning decisions from the start	Create mixed-use neighbourhoods with homes shops and services nearby	Prioritise access to public transport and active travel (walking cycling)	Protect and enhance existing green spaces and natural habitats	Design inclusive spaces that are accessible to all ages and abilities	Support local job creation through business hubs and training centres
Count	48	21	60	30	26	56	4	12
	49	60	39	30	34	39	13	7
	35	62	27	41	44	30	16	13
	55	55	17	45	41	28	17	18
	30	48	14	50	57	П	53	13
	20	18	10	52	43	42	70	16
	17	13	10	24	18	45	67	78
	15	5	76	6	16	29	33	92
Ranking	I	2	3	4	5	6	7	8



## What services do you most value having face-to-face? People were asked to rank with the most important at the top.

The most valued face-to-face service is adult social care or support for vulnerable adults, with respondents ranking it as their top priority. This highlights the importance of personal interaction in delivering compassionate and effective care. In second place is housing advice and support, reflecting the need for tailored guidance in navigating housing challenges. The third most valued in-person service is children's services and family support, underscoring the significance of direct engagement when supporting families and young people. These results show that when it comes to sensitive or complex issues, residents strongly prefer the reassurance and clarity that face-to-face services provide.

Count by position	Adult social care or support for vulnerable adults	Housing advice and support	Children's services and family support	Reporting neighbourhood or anti-social behaviour concerns	Waste and recycling issues	Benefits and financial support	Council tax or rent queries	Planning and building control advice	Help with digital services or online forms
1	89	42	51	80	42	12	11	8	19
2	96	44	65	47	39	23	13	22	5
3	50	77	66	44	26	28	17	27	19
4	41	98	37	20	30	75	29	15	9
5	48	41	54	15	22	65	79	18	12
6	15	23	46	10	77	60	92	17	14
7	8	14	15	11	80	53	62	99	12
8	5	10	9	103	31	25	44	103	24
9	2	5	11	24	7	13	7	45	240
Ranking	I	2	3	4	5	6	7	8	9

## What services do you most value having by phone? People were asked to rank with the most important at the top.

When it comes to phone-based services, residents most value the ability to report neighbourhood or anti-social behaviour concerns, with respondents ranking it as their top choice. This suggests that speed, discretion, and convenience are key when addressing community safety issues. In second place is housing advice and support, indicating that many prefer the immediacy and personal connection of a phone call when navigating housing challenges. The third most valued service by phone is adult social care or support for vulnerable adults, showing that even outside of face-to-face settings, people still seek direct and empathetic communication for sensitive matters. These preferences highlight the importance of accessible and responsive phone services for issues that require timely and personal support.

Count by position	Housing advice and support	Adult social care or support for vulnerable adults	Waste and recycling issues	Reporting neighbourhood or anti-social behaviour concerns	Council tax or rent queries	Children's services and family support	Benefits and financial support	Planning and building control advice	Help with digital services or online forms
1	35	28	43	71	36	20	8	14	19
2	41	56	53	33	30	17	17	19	8
3	43	45	20	38	31	41	20	22	14
4	85	43	18	7	18	42	40	14	7
5	37	55	10	10	39	51	56	6	10
6	13	22	49	2	56	60	53	13	6
7	6	14	56	13	41	18	57	64	5
8	6	4	21	78	23	14	15	96	17
9	8	7	4	22	0	11	8	26	188
Overall Ranking	1	2	3	4	5	6	7	8	9



## What would make it easier for you to use digital services confidently? People were asked to rank with the most important at the top.

The most important factor in helping residents use digital services confidently is having a clear and simple website or app design, with respondents ranking it as their top choice. This highlights the value of intuitive, user-friendly platforms that reduce frustration and make navigation straightforward. In second place is access to a device, such as a smartphone, tablet, or computer, showing that having the right tools is essential for digital inclusion. The third most valued support is telephone assistance alongside online services, reflecting the need for reassurance and help when navigating digital systems. These responses suggest that confidence in digital services grows when they are easy to use, well-supported, and accessible to all.

Count by position	Clear and simple website or app design	Access to free or low-cost internet or data	Telephone support alongside online services	Access to a device (e.g. smartphone tablet computer)	Step-by-step guidance or tutorials	In-person support or digital help hubs	More trust in how my data is used and protected	Services available in multiple languages or accessible formats
1	114	12	44	49	5	12	30	5
2	57	31	51	40	32	26	31	3
3	45	36	33	60	29	42	23	3
4	33	64	17	69	56	25	6	1
5	13	69	13	31	71	57	14	3
6	7	30	75	14	62	72	11	0
7	1	22	35	6	13	36	144	14
8	1	7	3	2	3	1	12	242
Overall Ranking	I	2	3	4	5	6	7	8

## How can we make sure everyone benefits from modernised services? People were asked to rank with the most important at the top.

The most important factor in ensuring everyone benefits from modernised services is to keep non-digital options – like phone and face-to-face – available, with respondents ranking it as their top priority. This reflects a strong desire for inclusivity and choice, especially for those who may struggle with digital access. In second place is the need to design services that are easy to use for people of all ages and abilities, highlighting the importance of intuitive and accessible design. The third most valued approach is to provide digital skills training and support in local communities, showing a commitment to empowering residents to confidently engage with modern services. These responses point to a clear vision: digital transformation must be inclusive, accessible, and supportive of everyone's needs.

Count by position	Keep non-digital options (like phone or face- to-face) available	Design services that are easy to use for people of all ages and abilities	Provide digital skills training and support in local communities	Ensure affordable access to devices and internet	Involve residents in designing and testing new digital services	Offer services in multiple languages and accessible formats	Build trust by being transparent about how data is used
1	151	43	37	14	20	4	19
2	54	116	55	19	24	5	15
3	36	64	72	30	44	19	23
4	27	44	75	41	32	58	11
5	14	18	35	87	19	82	33
6	5	3	12	76	37	46	109
7	1	0	2	21	H	74	78
Overall Ranking	I	2	3	4	5	6	7



### How can we keep you better informed and involved in decisions?

The most preferred way for residents to stay informed and involved in decision-making is through regular email updates or newsletters, with respondents ranking it as their top choice. This reflects a strong appetite for consistent, direct communication. In second place is making information available in multiple languages and formats, highlighting the need for inclusivity and accessibility. The third most valued method is community meetings or local forums, showing that many still appreciate face-to-face engagement and dialogue. These responses suggest that a mix of digital and in-person communication — tailored to diverse needs — is key to building trust and encouraging active participation in local decisions.

Count by position	Regular email updates or newsletters	Information available in multiple languages and formats	Community meetings or local forums	Social media updates and engagement	Clear and accessible information on the council	Online surveys and feedback forms	Opportunities to join community panels / forums or advisory groups	Better promotion of engagement opportunities in local areas
1	149	2	29	42	55	12	25	36
2	65	3	83	59	49	47	21	23
3	46	3	67	65	57	49	27	36
4	47	4	88	65	28	65	25	28
5	21	1	58	65	70	86	23	26
6	12	12	17	31	63	62	139	14
7	8	139	8	13	27	22	87	46
8	2	186	0	10	1	7	3	141
Overall Ranking	I	2	3	4	5	6	7	8

## **Plymouth Big Community Conversation events**

Between July and August 2025, six community events and one youth-specific session were held across Plymouth to gather feedback on the proposed boundary expansion. Facilitated by Council staff trained in Trauma-Informed and Appreciative Inquiry methods, these events created space for meaningful conversations and active listening. Residents were invited to attend without signing in, and the sessions were designed to be informal, inclusive, and responsive to local concerns. The insights captured reflect a wide range of perspectives and have been carefully analysed to inform the development of the final proposal.



## Question I: What concerns or opportunities do you see in PCC's proposal for an expanded local authority?

The conversations reveal a community that is open to change but deeply cautious. While there is no strong ideological opposition to the idea of an expanded local authority, there is a clear demand for evidence, equity, and engagement. People want to understand how the proposal will tangibly improve their lives, especially in terms of infrastructure, services, and representation.

The urban-rural divide is a central tension – participants fear that rural needs may be overlooked in a city-led model. However, there is also recognition of shared challenges and interdependencies, such as healthcare, transport, and housing pressures that cross current boundaries.

To move forward, the proposal must demonstrate clear, mutual benefits, address concerns about identity and access, and ensure that local voices are not only heard but empowered. The success of the expansion hinges on trust, transparency, and tailored delivery that respects the diversity of the communities involved.

#### Common themes

Infrastructure and services	There is concern that existing infrastructure (roads, transport, utilities, healthcare) is already under strain and may not cope with additional demand. Participants questioned whether the expansion would bring improvements or further dilute services.
Funding and financial transparency	Questions were raised about how the expansion would be funded, how council tax revenue would be allocated, and whether economies of scale would truly deliver savings. There's a desire for clarity on financial projections and equitable distribution of resources.
Representation and governance	People expressed a need for stronger local representation, especially in rural areas. The idea of town or parish councils for areas like Plympton was seen as a potential opportunity. Concerns were also raised about political shifts and the risk of rural voices being drowned out.
Identity and community cohesion	A recurring concern was the potential loss of identity for South Hams communities. There's a strong sense of distinctiveness between urban Plymouth and rural South Hams, and fears that expansion could blur or erase these differences.
Access and inclusion	Digital exclusion, transport limitations, and service accessibility were highlighted, particularly for older residents and those in outlying parishes. People want assurance that access will improve, not worsen.
Urban vs rural needs	There's a perceived mismatch between urban policy models and rural realities. Participants fear that a city-centric approach could lead to service closures or neglect in rural areas.
Opportunities for integration	Some saw the expansion as a chance to better align services, improve funding models (e.g. healthcare), and address cross-boundary issues like Sherford's impact on Plympton. There's cautious optimism if benefits are clearly demonstrated.
Planning, housing, and growth	Concerns about housing developments outpacing infrastructure were common. People want assurances that planning will be strategic, with adequate provision for GPs, schools, and transport.
Public engagement and trust	Scepticism exists due to past unfulfilled promises. There's a call for genuine engagement, especially with young people and digitally excluded groups, and a need to build trust through transparency and delivery.



# Question 2: What do you love most about the city and your neighbourhood, and what would you most like to see change in the future – try to think long term, not just in the next couple of years?

Plymouth is a city with deep emotional and cultural roots, where people feel connected to their environment, their neighbours, and their shared history. The city's natural beauty, compact character, and community spirit are its greatest strengths and residents are keen to protect these as the city evolves.

However, there's a clear appetite for thoughtful, long-term change. People want better transport, more vibrant cultural life, fairer governance, and stronger economic opportunities. They're not resistant to growth but they want it to be sustainable, inclusive, and respectful of Plymouth's identity.

The challenge for future planning is to balance ambition with authenticity: to grow without losing what makes Plymouth special, and to ensure that all neighbourhoods (urban and rural) feel heard, valued, and empowered in shaping the city's future.

### Common themes

Natural environment and location	The sea, moors, coastlines, and green spaces are deeply cherished. Plymouth's proximity to nature is seen as a defining asset, contributing to quality of life and identity. There's a desire to preserve and enhance these features, not compromise them through overdevelopment.
Community and identity	A strong sense of community and neighbourhood pride came through clearly. People value knowing their neighbours, grassroots action, and the diversity of the city. There's concern that expansion or rapid change could dilute this cohesion.
Transport and connectivity	Transport is both a strength and a frustration. While some areas are well connected, others suffer from infrequent services and poor infrastructure. Long-term aspirations include better rail links (e.g. to London), a second rail route, improved bus services, and even tram systems. Connectivity with Cornwall and Europe (via ferry) was also mentioned.
Culture, creativity and heritage	Plymouth's cultural assets – theatres, universities, historic sites – are appreciated but under-promoted. There's a call to celebrate the city's maritime history more visibly and to invest in creative industries and venues that bring vibrancy to the city centre.
Housing and urban development	Concerns were raised about housing affordability, management fees, and the character of new developments. People want more housing in the city centre, but with thoughtful planning that respects existing communities and infrastructure limits.
Public services and amenities	Libraries, healthcare, education, and leisure services are valued, but there's a desire for more consistency and investment. Issues like drainage, sewage, and access to adult social care were flagged as needing attention.
Economic opportunity and skills	There's a sense that Plymouth hasn't fully realised its economic potential. Calls were made for better job opportunities, skills development, and leveraging assets like the Freeport and waterfront to attract investment and tourism.
Governance and fairness	Frustrations around parking permits, solar panel grants, and perceived inequalities (e.g. Devonport vs other areas) suggest a need for more transparent and equitable decision-making. People want to see where money is spent and feel fairly treated.
Youth voice and future generations	A few comments highlighted the absence of young people's perspectives. There's a recognition that long-term planning must include their voices and address their needs — from education to housing to cultural life.



## Question 3: Which services do you need to be delivered in person or over the phone or digitally because they are personal or more effectively delivered that way?

The community recognises the benefits of digital services; speed, convenience, and efficiency but is clear that digital cannot be the only option. People want a blended approach that respects individual needs, abilities, and preferences.

There's a strong desire for equity in access, whether that's through better-designed websites, more responsive phone lines, or the preservation of in-person services. Libraries and local offices are seen as untapped assets that could play a bigger role in bridging the digital divide.

Ultimately, residents want a council that is easy to reach, responsive, and inclusive. One that listens to feedback and designs services around the real-life experiences of its communities.

#### Common themes

Digital access and inclusion	While many are comfortable using digital services, there's a strong awareness of digital exclusion, especially among older residents and those in rural areas like South Hams. Poor internet coverage, lack of digital skills, and inaccessible websites were frequently mentioned. People want choice, not compulsion, in how they access services.
In-person services still matter	Libraries, local offices, and the former One Stop Shop were praised as vital community hubs. In-person contact is especially valued for complex, sensitive, or urgent issues (e.g. adult social care, SEND, antisocial behaviour). There's a desire to retain face-to-face options, particularly for those who struggle with digital or phone-based systems.
Telephone access and responsiveness	Many expressed frustration with the lack of phone numbers, long wait times, and unclear call prioritisation. A good telephone service is seen as essential, especially for those who can't or don't want to go online. People want clearer communication and faster response times.
Website and digital services	Experiences with the council website were mixed. Some found it user-friendly for tasks like reporting bins or renewing bus passes, while others described it as confusing, poorly designed, or inaccessible. There's a call for improved usability, mobile-friendliness, and clearer navigation.
Channel flexibility and user choice	A recurring theme was the need for multiple access routes: digital, phone, and in-person, to suit different needs and preferences. People want to opt in to digital communications (e.g. letters), not be forced into them. Services should be designed around the user, not the system.
Libraries as community access points	Libraries were frequently mentioned as trusted, accessible spaces that could be better used for service delivery, digital support, and community engagement. Plymstock Library was singled out as an excellent example.
Equity and accessibility	There's concern that current systems disadvantage people with disabilities, those without internet access, or those unfamiliar with digital tools. Accessibility (both physical and digital) needs to be reviewed and improved across all services.



## Question 4: How can the council be better to listen to residents and keep you informed?

Residents want a council that is visible, approachable, and proactive in its communication. They appreciate opportunities to engage in person and want these to be more frequent, better advertised, and inclusive of all communities.

There's a clear call for transparency and clarity. Not just in what decisions are made, but why. People want to understand the rationale behind council actions and feel confident that their voices are being heard and considered.

To build trust and improve engagement, the council must embrace a multi-channel strategy that includes digital, print, broadcast, and face-to-face methods. It must also actively seek out diverse voices, including young people, disabled residents, and those who are digitally excluded. Ultimately, good communication is not just about broadcasting information, it's about building relationships, closing feedback loops, and making residents feel part of the city's journey.

#### Common themes

Face-to-face engagement	Events like the facilitated conversations were widely praised. People value personal interaction, saying it's the best way to feel heard and understood. There's a strong call for more in-person forums, especially for major decisions or proposals.
Clear, accessible communication	Residents want plain-language explanations of decisions, especially around taxation, planning, and proposals like the expansion. There's frustration with speculation and misinformation, often from third-party sources like Plymouth Live, and a desire for the council to get ahead of the narrative.
Multi-channel information sharing	Suggestions included radio slots, posters, billboards, newsletters, TV interviews, and school-based engagement. People want a mix of digital and non-digital channels to reach different demographics, including those who are digitally excluded or geographically distant.
Digital inclusion and website usability	The council website was described as difficult to navigate, especially for finding updates or reporting issues. There's a need for better design, clearer structure, and mobile-friendly features. Digital exclusion remains a barrier for many, especially older residents and those in rural areas.
Listening and feedback loops	Residents want to feel that their input leads to action or change. There's a perception that feedback is sometimes ignored or dismissed. Suggestions included surveys, customer experience sharing, and clearer follow-up on what's been done in response to public input.
Youth and diverse voices	There's a desire to hear from young people and under-represented groups, and to ensure that engagement reflects Plymouth's diverse population. Schools, community groups, and cultural organisations were suggested as partners.
Localised and timely updates	People want more notice about decisions, events, and service changes. Suggestions included apps, Friday email roundups, and printed newsletters like those used in Exeter. Timely updates on issues like roadworks, waste collection, and local projects are especially valued.

### Plymouth Youth Big Community Conversation event

Young people aged 13-19 were invited to attend a facilitated conversation event to discuss the future of Plymouth. Attendees included members of the Plymouth Youth Parliament.



### Question I: What do you like about your area?

Young people in Plymouth shared a strong appreciation for the local environment, highlighting the city's green spaces, seafront, and proximity to Dartmoor as key features that support wellbeing and offer opportunities for outdoor activities. The presence of parks and skateparks, particularly Central Park, was noted as important for recreation and socialising.

Transport was another positive theme, with several mentioning that public transport – especially buses and the train station – is generally reliable and well-connected, making it easier to get around the city.

There was also a clear sense of value placed on community and opportunity. Free cultural venues like The Box, youth groups, and organisations such as cadets were praised for providing spaces to connect, learn, and grow. These opportunities contribute to a feeling of belonging and safety, with some respondents noting that the area feels "relatively safe."

Finally, Plymouth's rich culture and heritage were recognised as part of what makes the city unique and engaging for young people.

### Question 2: What would you like to see change in your local area

Young people in Plymouth expressed a clear desire for more things to do, especially youth centres and leisure options like swimming pools, ice rinks, and music venues. They want spaces that are engaging, inclusive, and not just run by the council – places that feel genuinely youth-led and community-driven.

Transport was another key theme, with calls for more reliable and frequent bus services, especially to outer boroughs. Respondents highlighted issues with buses not following timetables or failing to stop, which affects their ability to travel independently and access opportunities.

There's also a strong interest in improving the local environment, including more benches, bins, and better lighting, especially in darker months. Concerns were raised about abandoned buildings and the need for cleaner, safer public spaces.

Community and wellbeing featured prominently. Young people want a stronger sense of community, with more volunteering opportunities that are well-promoted and incentivised – such as discounts on concert tickets. They also called for better SEND and mental health services, and lower waiting times in emergencies, showing a need for more responsive and inclusive support systems.

Finally, there were suggestions for more residential homes in the city centre, greater retail and dining variety, and development of district centres to bring services and activities closer to where people live.



### Question 3: What do you want Plymouth to look like in 50 years

Young people envision a future Plymouth that is better connected, more inclusive, and full of opportunity. A key theme is transport, with aspirations for trams, improved train links, and even air travel, making the city more accessible both locally and nationally. They also want greener transport options and a push for eco-friendly infrastructure.

Housing and affordability are central to their vision. Young people want more housing options, especially affordable homes that allow them to stay in Plymouth long-term. They also hope to see fewer empty buildings and a focus on building on brownfield sites to protect natural spaces.

Employment and opportunity are vital. There's a desire for great job options, more apprenticeships, and work experience across diverse sectors, including law and creative industries. They also want youth services available city-wide, and part-time jobs for 16-year-olds that can fit around school.

Community pride and wellbeing matter too. Young people imagine a city with more celebratory events, stronger community identity, and better access to public services, including SEND and mental health support. They'd like to see purple help points distributed across Plymouth for safety and assistance.

Finally, they want Plymouth to grow into a bigger, more vibrant city that attracts investment, while still preserving its green and blue spaces and the distinct character of its neighbourhoods.

### Question 4: What would make you want to stay living here?

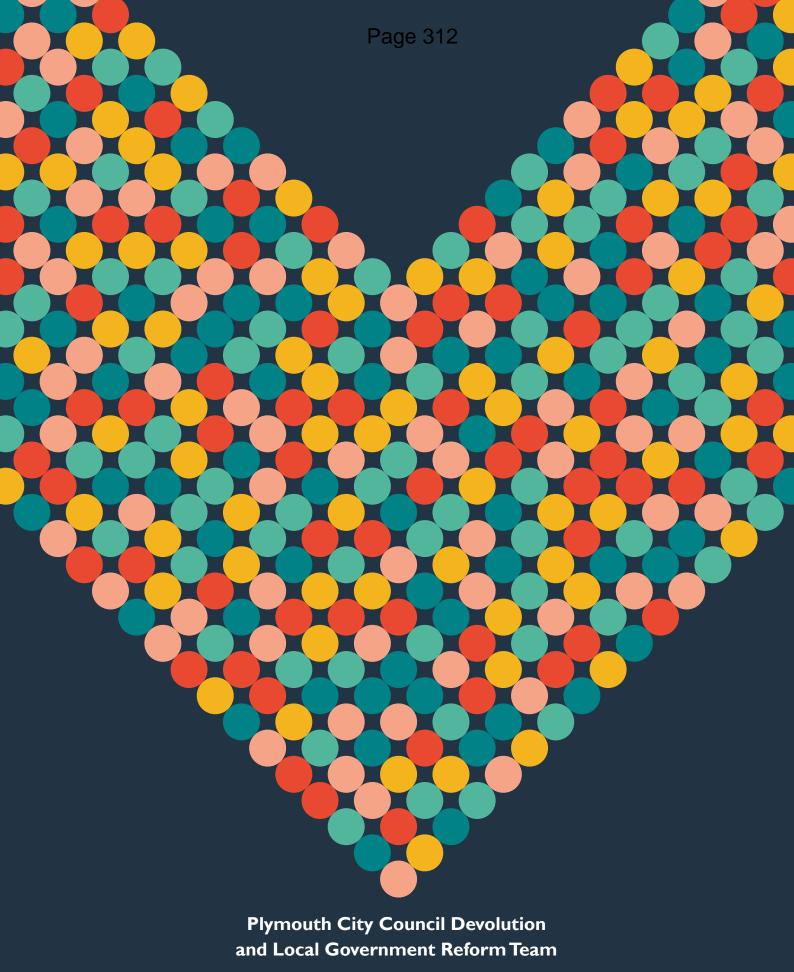
Young people in Plymouth shared a clear vision for what would encourage them to build their futures in the city. Better job opportunities and affordable housing – including rent control – were top priorities, reflecting a desire for stability and independence. Many also emphasised the importance of access to healthcare, especially mental health support, dentists, and primary services like GPs, which they feel are currently lacking.

Education and career development are also key motivators. Respondents highlighted Plymouth's strengths, such as its three universities and military pathways, but called for improvements in SEND support and more opportunities for young people, including platforms like UK Youth Parliament.

The city's natural beauty and open spaces were appreciated, especially in comparison to other urban areas. However, young people also want improved transport links to other cities, so they can live in Plymouth while accessing opportunities elsewhere.

Finally, safety was a recurring theme. Suggestions included more lighting, help points, and general awareness, all aimed at making Plymouth feel safer and more welcoming.





Plymouth City Council
Ballard House
West Hoe Road
Plymouth PLI 3BJ