

# Scrutiny Management Board



Date of meeting: 12 November 2025

Title of Report: **Plymouth City Council's Draft 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/121124

Key Decision: Yes

Confidentiality: Part I - Official

## Purpose of Report

The purpose of this report is to update the Scrutiny Management Board following the “Big Community Consultation” held between May 2025 and October 2025 on the progress with local government reorganisation and to seek feedback on the draft proposal to be considered by the City Council and Cabinet on 24 November 2025 regarding the preferred proposal for local government reorganisation for Devon.

## Recommendations and Reasons

### That the Scrutiny Management Board:

- 1. Notes the content of the attached “Plymouth City Council's Draft Local Government Reorganisation Proposal for Devon” and provides any comments for Cabinet to consider.**

*Reason: To note progress with the preparation of a proposal by Plymouth City Council for local government reorganisation in Devon in response to the government's Statutory Invitation issued by the Secretary of State for Housing, Communities and Local Government on 05 December 2025 and to provide any comments on the proposed approach for consideration by Cabinet on 24 November 2025 in order for the City Council to comply with the requirement to submit a single proposal by 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 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 three options and approved the "Plymouth Growth Area" option now being put forward as "expanded Plymouth" 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 South West 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 as 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 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" 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 the financial modelling. This risk has been mitigated as far as possible through detailed financial modelling, undertaken to a level of granularity and in collaboration with a working group of finance officers across Devon. Specialist external consultants have also been commissioned to estimate formula-driven income streams, and to support balance sheet analysis. The full proposal (to be considered by Cabinet and the City Council on 24 November 2025) is attached as Appendix A and 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 the likely effect of the exercise of those functions 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 “enlarged 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 “expanded Plymouth” 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 “1-4-5” 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 very real possibility of the whole 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	Exemption Paragraph Number (if applicable) <i>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.</i>						
		1	2	3	4	5	6	7
A	Plymouth City Council's Draft Local Government Proposal for Devon (November 2025)							

## Background papers:

Title of any background paper(s)	Exemption Paragraph Number (if applicable) <i>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.</i>						
	1	2	3	4	5	6	7
<a href="#">Government White Paper</a>							

Sign off:

Fin	ITG.2 5.26.0 78	Leg	LS/00 0038 4/9/L B/04/ 11/25	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: 24 October 2025 (Tracey Lee, Chief Executive)											
Cabinet Member approval: Councillor Tudor Evans OBE, Leader Date approved: 03 November 2025											





# Plymouth City Council's Local Government Reorganisation Final Proposal

November 2025

DRAFT



Plymouth City Council Devolution  
and Local Government Reform Team



<b>Introduction</b>	6
<b>The Current Situation in Plymouth</b>	10
<b>Why Plymouth Needs to Expand</b>	13
<b>Why Devon Needs Fundamental Reform</b>	19
<b>Plymouth City Council's Base Proposal for Local Government in Devon</b>	23
<b>Plymouth City Council's Modified Proposal for Local Government in Devon</b>	26
<b>How Four-Unitary Model Delivers</b>	29
<b>Why Boundary Modifications Are Essential</b>	31
<b>Creating The Right Solution for All Devon</b>	33
<b>Comparing the Options</b>	36
<b>Option One: Four Unitaries on District Boundaries (Base Case)</b>	38
Option One: Plymouth	39
Option One: Torbay	42
Option One: Exeter	45
Option One: Devon Coast and Countryside	47
Option One: Assessment Against Criteria	50
<b>Option Two: Four Unitaries (Modified Case)</b>	52
Option Two: Expanded Plymouth	53
Option Two: Expanded Torbay	56
Option Two: Expanded Exeter	58
Option Two: Devon Coast and Countryside	60
Option Two: Assessment Against Criteria	61
<b>Option Three: Three Unitaries (New Devon)</b>	64
Option Three: Plymouth	66
Option Three: Torbay	67
Option Three: Devon County Council Area	68
Option Three: Assessment Against Criteria	69
<b>Option Four: Three Unitaries (District Grouping)</b>	72
Option Four: Plymouth	73
Option Four: Four District Unitary	74
Option Four: Five District Unitary	76
Option Four: Assessment Against Criteria	77
<b>Democracy and Community Empowerment</b>	81
<b>Better Services Across Devon</b>	89
<b>Financial Resilience</b>	104
<b>Building the Foundations for the South West Peninsula Devolution</b>	120

**Stakeholder Engagement and Support**..... 124

**Implementation Plan** ..... 128

**Managing Transition Risks**..... 133

**Our Asks of Government**..... 135

**Conclusion**..... 136

DRAFT

## 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.

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.

## Introduction

- I.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.
- I.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.
- I.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, 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.
- I.4. Our modified proposal fully meets the government's criteria because it better aligns 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.
- I.5. Why four unitaries? Plymouth has carefully considered the options for Devon and concluded that four unitary authorities is the only model that works effectively:
  - **Not one** - A single Devon unitary of 1.2 million people across 2,560 km<sup>2</sup> would be too remote, failing to recognise that Plymouth's urban needs differ fundamentally from Exeter's rapid growth challenges, Torbay's coastal character, and rural Devon's dispersed communities.
  - **Not two** - Keeping Plymouth and Torbay as they are whilst creating a 'New Devon' would submerge Exeter - Devon's capital and fastest-growing city - within a vast authority where it becomes a minority voice. This would be a democratic failure and would hinder Exeter's growth potential that benefits all of Devon.
  - **Not three** - Various three-unitary options either repeat the mistake of submerging Exeter or create incoherent groupings that cut across functional economic areas.
  - **Four is right** - Four unitaries allows Plymouth to serve its local area effectively, gives Exeter the governance it needs to manage rapid growth, maintains Torbay's proven model, and creates a purpose-designed authority for rural and coastal Devon.

- I.6. 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, SEND provision, adult social care, and preventative services
- I.7. 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. 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.8. 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.
- I.9. 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.
- I.10. Plymouth City Council has an excellent track record of financial management and 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.
- I.11. 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.
- I.12. 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

- I.13. The existing two-tier structure of local government creates artificial barriers in areas that naturally function as part of Plymouth's urban region. 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's 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.
- I.14. 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 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

- I.15. Plymouth has established itself as a successful unitary authority with a strong track record of financial management, 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.
- I.16. 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.
- I.17. 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 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

- I.18. Whilst we recognise that Government has set out its own criteria for local government reorganisation, and we support those; we have developed our own principles for local government reorganisation which reflect the unique position of Plymouth and the surrounding area. In the time we have had to discuss these proposals with key stakeholders, we have considered local government options against the following:

1. Any boundary change will be appropriate for a continuing 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.

## 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 1 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 co-operation and shared priorities with surrounding authorities. This would deliver inefficient government and sub-optimal strategic place-shaping leadership for Plymouth and the sub-region. 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 through, for example, the New Growth Points initiative.
- 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 Freeports Team and Ministry of Housing, Communities and Local Government (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.

#### **How our modified proposal would meet the six White Paper Criteria**

2.14. Our proposal for the creation of four unitary councils in Devon based on the requested Ministerial modification provides for better overall outcomes, greater resilience, and provides strong support for devolution to drive growth through three urban-based councils and allowing the proposed Coast and Countryside Council to focus completely on the delivery of services to rural communities. Indeed, the previous Devon County Council Economic Strategy prioritised 28 towns and villages. Following the modification the new Coast and Countryside unitary council will be still have 20 of these towns within its new area to maintain overall resilience of service delivery.

## 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 1 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 1 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

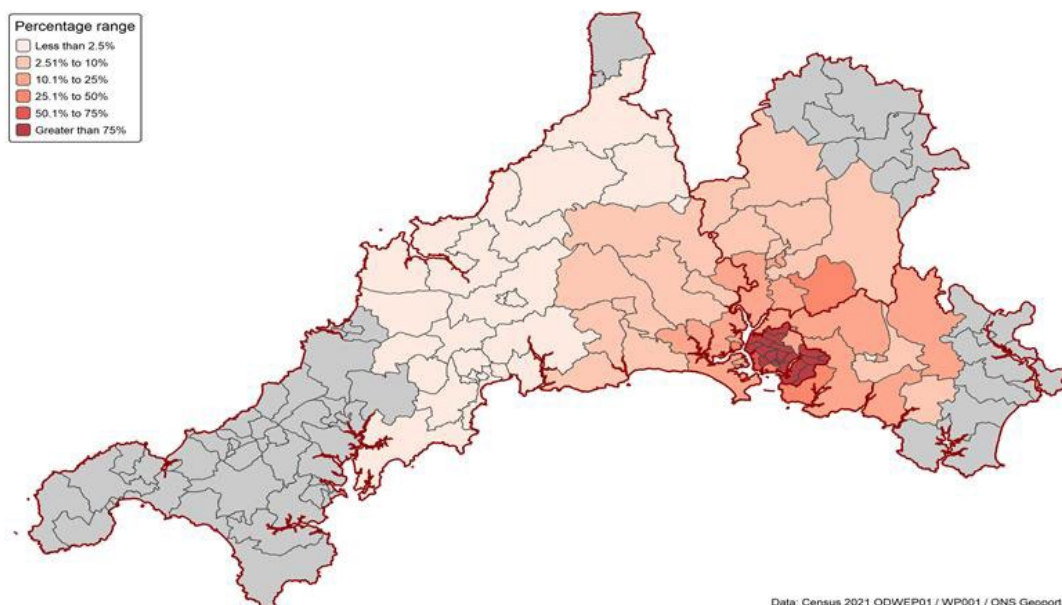
investment of £4.4 billion in HMNB Devonport will kickstart a confirmed programme of work that extends to 2070 and which is of unique national importance, as demonstrated in Government's Defence Industrial Strategy.

- 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 7.1.

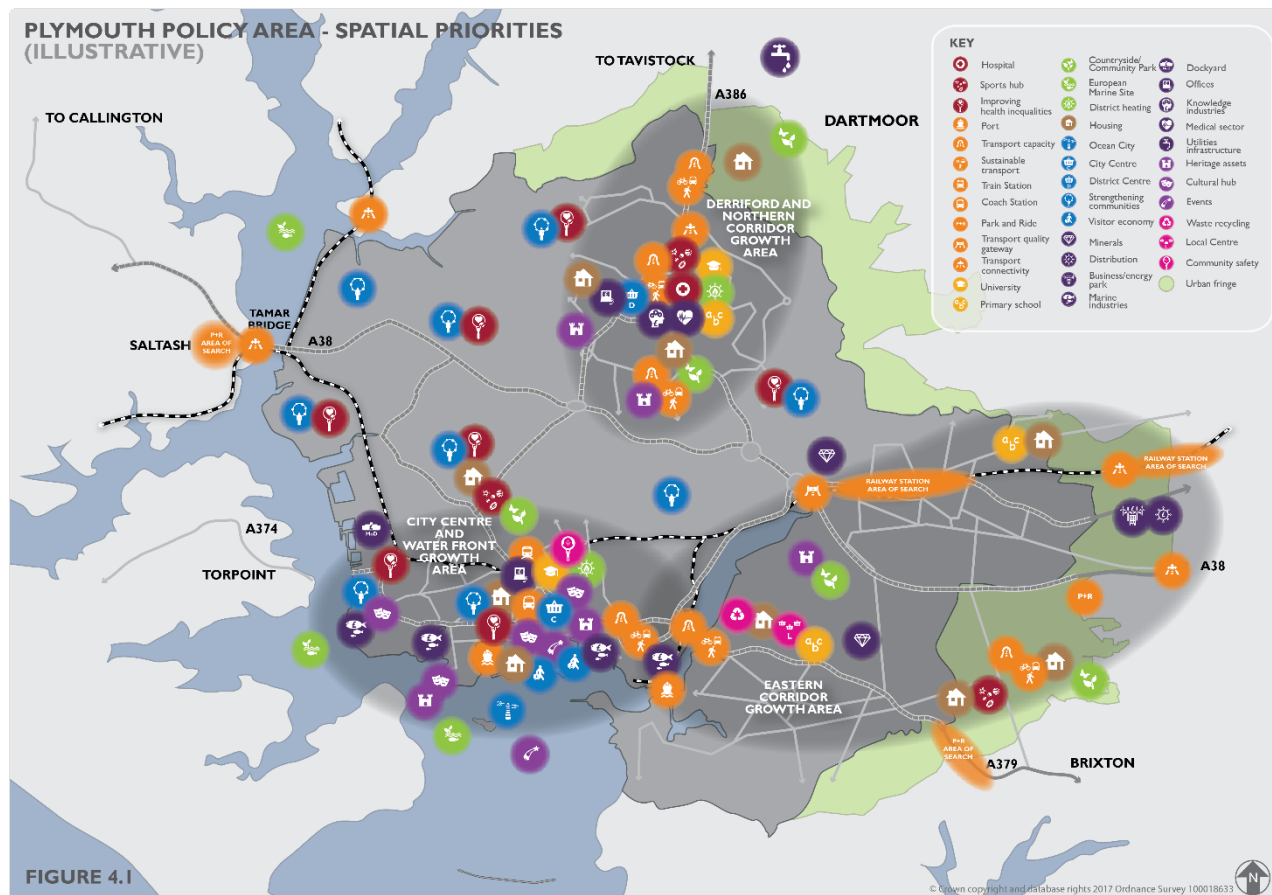
Proportion of population working in Plymouth



- 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 7.2). 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.

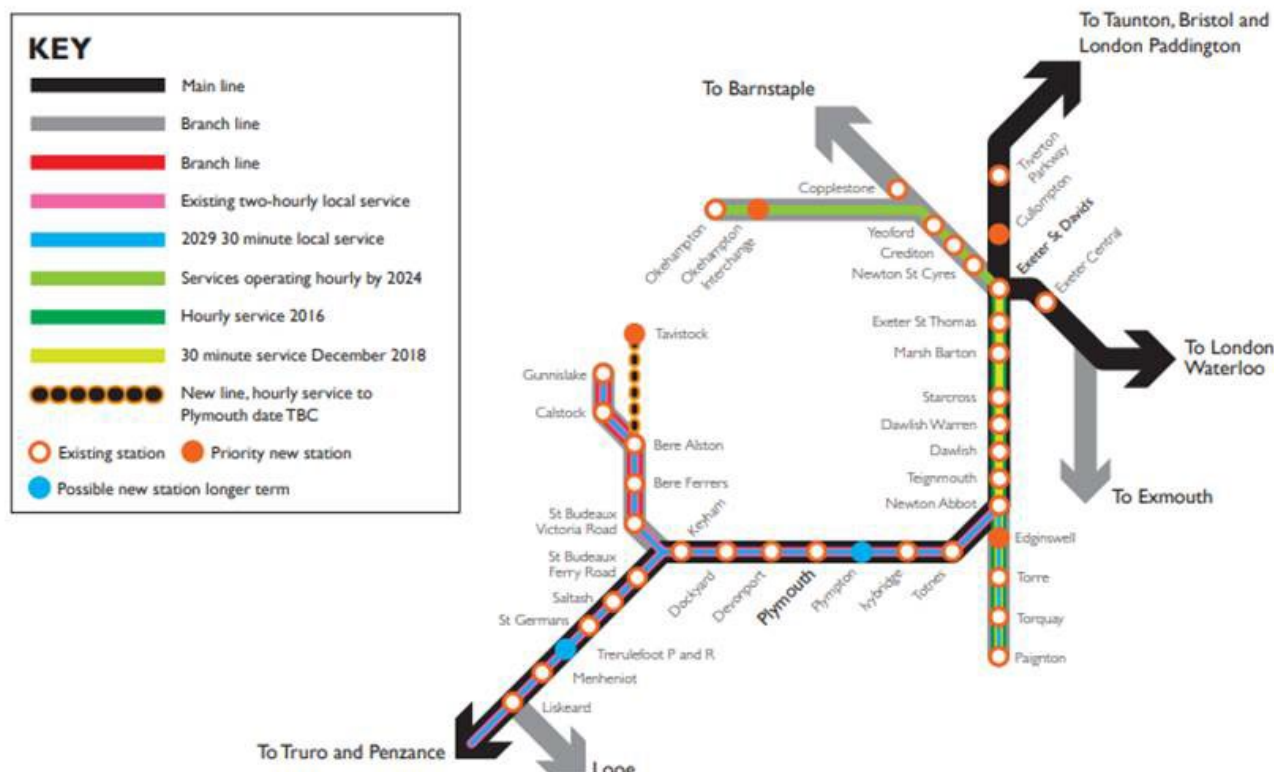
Figure 7.2



- 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 7.3. 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 7.3

## 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**

- Having retained our planning, place-making and regeneration capacity, we have committed £300 million capital over the last ten years to regeneration, leveraging 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**

- 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 Reform

- 4.1. Whilst this submission focuses on Plymouth's proposal for expansion into South Hams, we recognise that the case for local government reform applies across all of Devon. Plymouth's proposal 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.

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

- 4.2. The current two-tier system creates problems that extend far beyond Plymouth's boundary constraints. Fragmented strategic planning is perhaps the most visible failure. 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.
- 4.3. 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.
- 4.4. Perhaps most critically, the two-tier system prevents Devon from addressing its strategic priorities effectively. Major challenges including housing delivery, climate resilience, health and social care integration, and inclusive economic growth all require joined-up approaches that bring together services currently split between county and district. Devon cannot afford to continue with a structure that makes strategic thinking difficult and integrated delivery nearly impossible.

### The Challenge Facing Exeter

- 4.5. Exeter faces a particular set of challenges that the current system cannot address. The city is growing rapidly, with population growth of 5.9% compared to the national average of 3.8%. This growth is 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.
- 4.6. 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. 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.

- 4.7. 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. The city cannot do this effectively when critical decisions are split between Exeter City Council, East Devon District Council, Teignbridge District Council, Mid Devon District Council, and Devon County Council. Exeter needs unitary status with modest boundary extensions to align governance with economic and social reality. Anything less condemns Devon's capital to governance structures that actively hinder its ability to deliver the growth the county needs.

### **The Success Story in Torbay**

- 4.8. Torbay provides important evidence that unitary authorities of this scale can deliver excellent services when they serve coherent communities with distinct identities. Torbay has operated successfully as a unitary authority for over two decades, demonstrating that populations of approximately 140,000 can support effective governance. The authority's compact geography of just 63 km<sup>2</sup> and distinct identity as the English Riviera create a clear sense of place that residents recognise and value.
- 4.9. Torbay faces distinct challenges that require tailored responses. With 28% of its population aged 65 or over, the authority has an ageing demographic that creates sustained demand for adult social care and health services. The area experiences high deprivation levels in some coastal wards whilst simultaneously managing a tourism sector that supports 8,000 jobs. Balancing regeneration investment with service provision for vulnerable populations requires careful judgement and local knowledge. Torbay has demonstrated innovative approaches to health and social care integration, building strong partnerships between the council, NHS, and voluntary sector to deliver services that work for its communities. The authority's strong balance sheet and history of transformation show that smaller unitary authorities can be financially robust and operationally effective.
- 4.10. Torbay's continuing success validates the principle that unitary authorities should serve communities with genuine shared identity rather than being sized according to arbitrary population thresholds. The authority should continue as a unitary within the four-authority framework, maintaining its proven model whilst benefiting from enhanced collaboration through the Peninsula Mayoral Strategic Authority.

### **The Distinct Challenge of Rural and Coastal Devon**

- 4.11. 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.

- 4.12. The two-tier system creates particular problems in rural areas. 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 be delivered across enormous distances to an older demographic, with over 25% of residents aged 65 or over in many rural areas. The road network stretches to 24,556 kilometres, requiring constant maintenance across challenging terrain. Environmental services, waste collection, planning, and economic development all cost more per head in rural areas, yet the two-tier system adds an extra layer of complexity and expense rather than enabling strategic commissioning at the right scale.
- 4.13. Rural Devon also has a distinct economic base built around agriculture, food production, rural tourism, and small businesses. Market towns have different needs than cities. Villages and dispersed communities require different approaches to service delivery than suburban areas. The workforce patterns, skills needs, and economic development priorities in rural areas bear little resemblance to those in urban Plymouth or Exeter. These communities deserve governance that understands and responds to their specific circumstances rather than imposing urban models or treating them as an afterthought.
- 4.14. 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. This authority could focus investment on the right priorities for dispersed populations, including rural transport, preventing costly residential care placements through community-based support, supporting market towns, and maintaining the landscape and environment that defines rural Devon. These priorities would be lost in a larger authority dominated by urban populations with different needs.

### **Why Four Unitaries Is the Right Answer**

- 4.15. 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.
- 4.16. Alternative models fail Devon in predictable ways. A single mega-council of 1.2 million people across 2,560 square kilometres would be too remote and would fail to recognise that urban Plymouth's needs differ fundamentally from Exeter's rapid growth challenges, Torbay's coastal character, and rural Devon's dispersed geography. Democratic accountability would weaken and the council would fail to have the managerial and political grip to focus on service delivery and to drive growth. Two unitaries, keeping Plymouth and Torbay whilst creating a vast "New Devon" authority, would submerge Exeter within an

authority where the capital city becomes a minority voice. This would be a democratic failure and would hinder Exeter's growth potential that benefits all of Devon. Three-unitary options either repeat the mistake of submerging Exeter or create incoherent groupings such as combining dense urban areas with dispersed rural communities that have nothing in common.

- 4.17. Four unitaries with modest boundary modifications enables each authority to focus on its distinct priorities whilst collaborating through the 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. 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.

## **Plymouth City Council's 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).

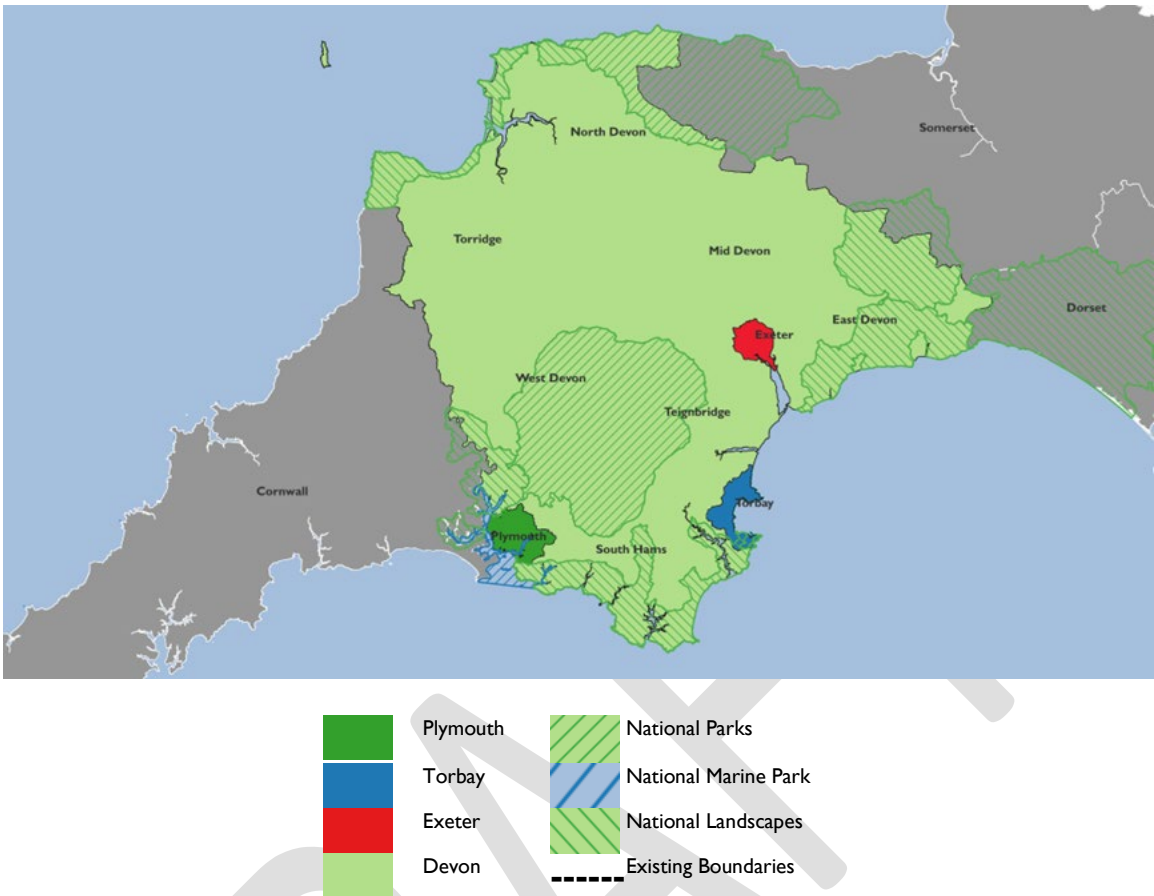
5.2. Our base case for local government reorganisation in Devon is as follows:

- 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 Plymouth's 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 2.1



Base Case Assessment

Table 2.1

Government Criteria	Assessment	Rationale
1. Single tier of local government	Met	<ul style="list-style-type: none"> <li>Creates 4 unitary councils using the existing principal authorities as building blocks.</li> <li>Meets the government 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 style="list-style-type: none"> <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 style="list-style-type: none"> <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 style="list-style-type: none"> <li>Provides for recognised and legally coherent administrative boundaries but does not respond to concerns and issues raised during the Big Conversation engagement</li> <li>Would require transitional arrangements and would also require a more formal mechanism than a modified proposal.</li> <li>Is not supported by current local authorities.</li> </ul>
5. Support for devolution	Partially Met	<ul style="list-style-type: none"> <li>Creates a group of constituent authorities across Devon to link into a Peninsula Mayoral Strategic Authority (to which Cornwall Council could be added).</li> <li>In the absence of Ministerial modifications for Plymouth, Exeter and Torbay, this would place heavy reliance on the Spatial Development Strategy bringing forward deliverable and supported 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 style="list-style-type: none"> <li>Maintains a foundation of existing governance and neighbourhood engagement arrangements in each of the unitary authorities.</li> </ul>
<b>Plymouth Principles</b>		
1. Financial viability and population	Not Met	<ul style="list-style-type: none"> <li>The constrained population base does not deliver a sufficient tax base to improve overall financial viability and ensure long-term sustainability.</li> </ul>
2. Character and identity	Met	<ul style="list-style-type: none"> <li>The Base Case preserves Plymouth's distinct, compact urban character, which is reflected in high population density.</li> </ul>
3. Respect for boundaries	Met	<ul style="list-style-type: none"> <li>This option respects the boundaries of existing unitary authorities.</li> </ul>
4. Dartmoor National Park	Met	<ul style="list-style-type: none"> <li>The city's existing boundaries do not impinge upon Dartmoor National Park or create governance complexities for the Park Authority.</li> </ul>
5. Parish boundaries	Met	<ul style="list-style-type: none"> <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 style="list-style-type: none"> <li>The geographic constraint of 79.9 square kilometres prevents strategic growth opportunities, inhibiting Plymouth's capacity to fulfil its strategic regional role.</li> </ul>



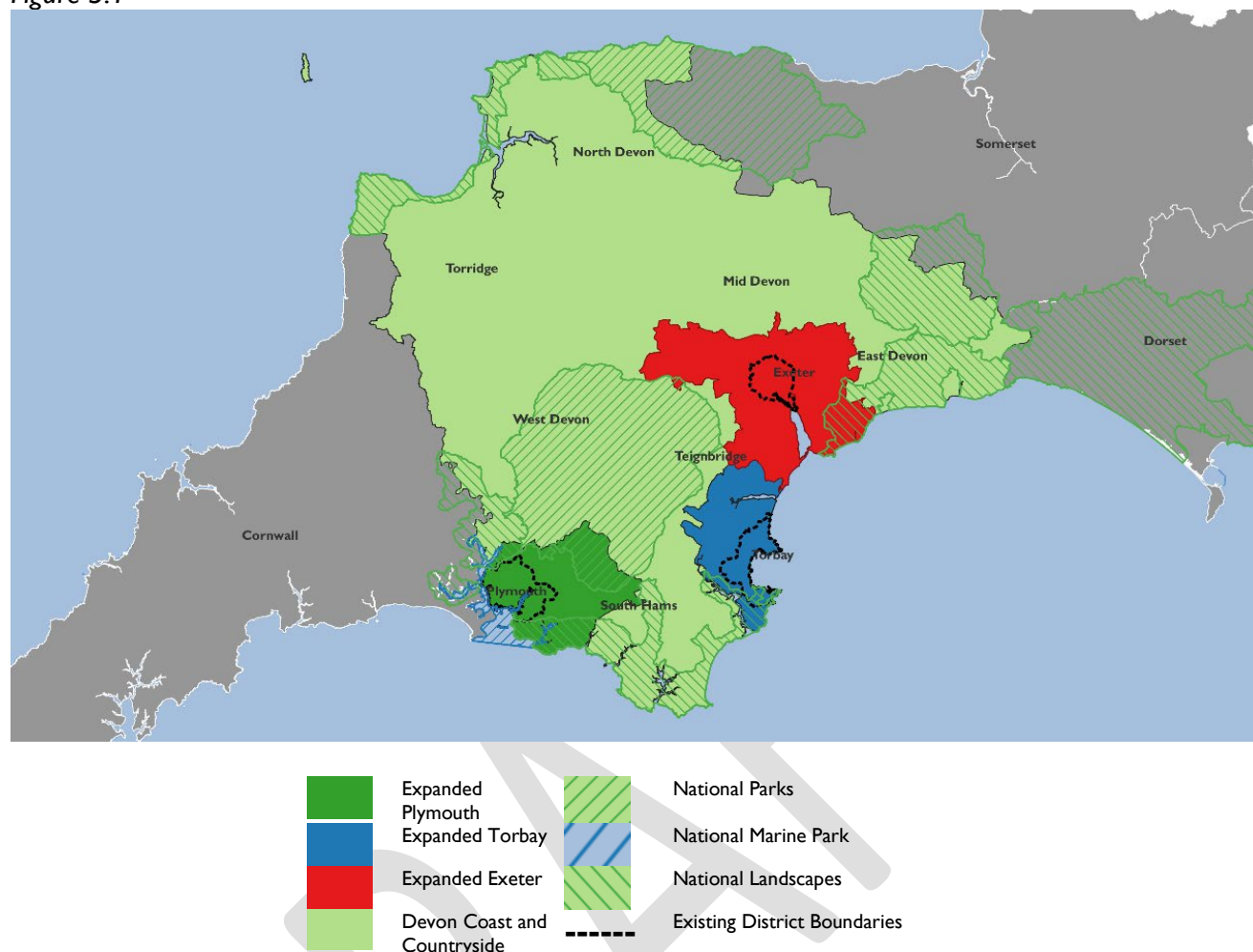
## **Plymouth City Council's Modified Proposal for Local Government in Devon**

6.1. We request a Ministerial modification to our base case proposal because this will deliver longer-term benefits in proactively working with the 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:

Figure 3.1



### 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 Four-Unitary Model Delivers

7.1. We have a vision to see a pattern of local government in 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 Plymouth City Council would be a “Continuing Authority”**

- 7.5. 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.

7.6. 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”.

7.7. 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 Boundary Modifications Are Essential

- 8.1. As a city, and as a council, Plymouth has a track record of innovation, collaboration and focus on delivery through a wide variety of programmes 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, one that reflects the true nature of place and enables planning, investment, and infrastructure decisions to be made consistently across a wider area.
- 8.2. We are a successful, award-winning unitary authority but our ability to deliver a step change in jobs and housing and provide the strategic leadership needed to make this happen is significantly constrained by our outdated and tightly drawn boundary that excludes key functional areas of the city.
- 8.3. Based on the 2022 Office of National Statistics (ONS) population projections, a Plymouth Council of approx. 300,000 on vesting day would increase to approximately 325,000 by 2050. An authority encompassing this extended area would achieve greater financial sustainability, deliver high-quality services to residents already connected to the city through employment, and accommodate future growth.

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

- 8.4. 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.
- 8.5. 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

- 8.6. 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.
- 8.7. 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

8.8. 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.

8.9. 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**

8.10. 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.

8.11. 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. This is why Plymouth's four-unitary proposal includes an expanded Exeter authority - because Devon needs its capital city to succeed.

### Why Torbay Should Expand its Unitary Authority

- 9.5. Torbay provides crucial evidence for Plymouth's wider argument about local government reorganisation in Devon. The current authority 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 28% 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. The creation of a Devon Coast and Countryside authority represents the most significant new element in Plymouth's four-unitary proposal, and it is essential to the model's success. 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. Plymouth's 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 1: 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**

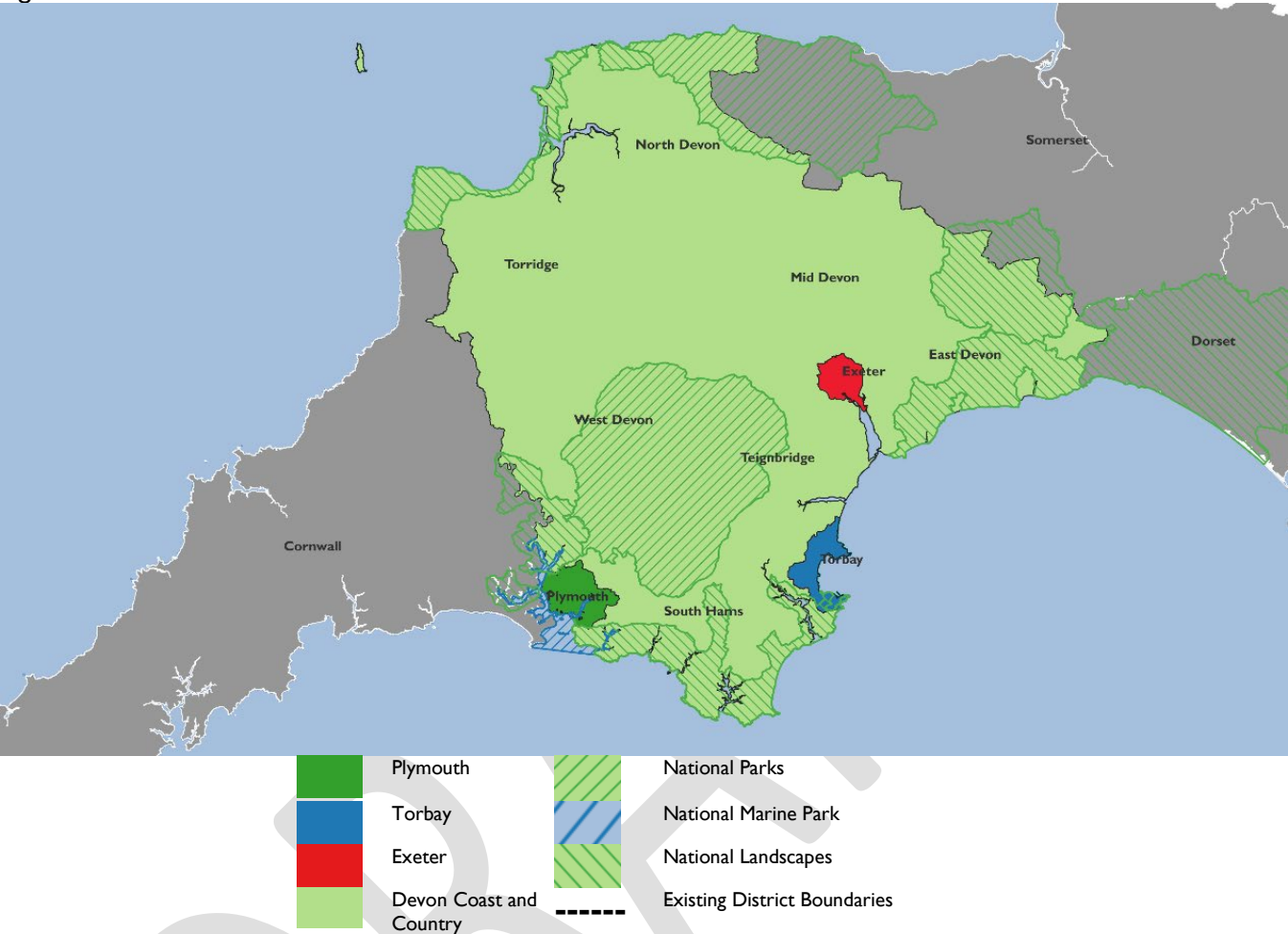
- 10.9. On 17 March 2025, Plymouth City Council endorsed Option 1 as the preferred approach and approved submission of the Plymouth Local Government Reorganisation Interim Plan to Government. The Council also agreed to commission expert advice and support to develop the detailed evidence base for the 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)

Figure 10.1

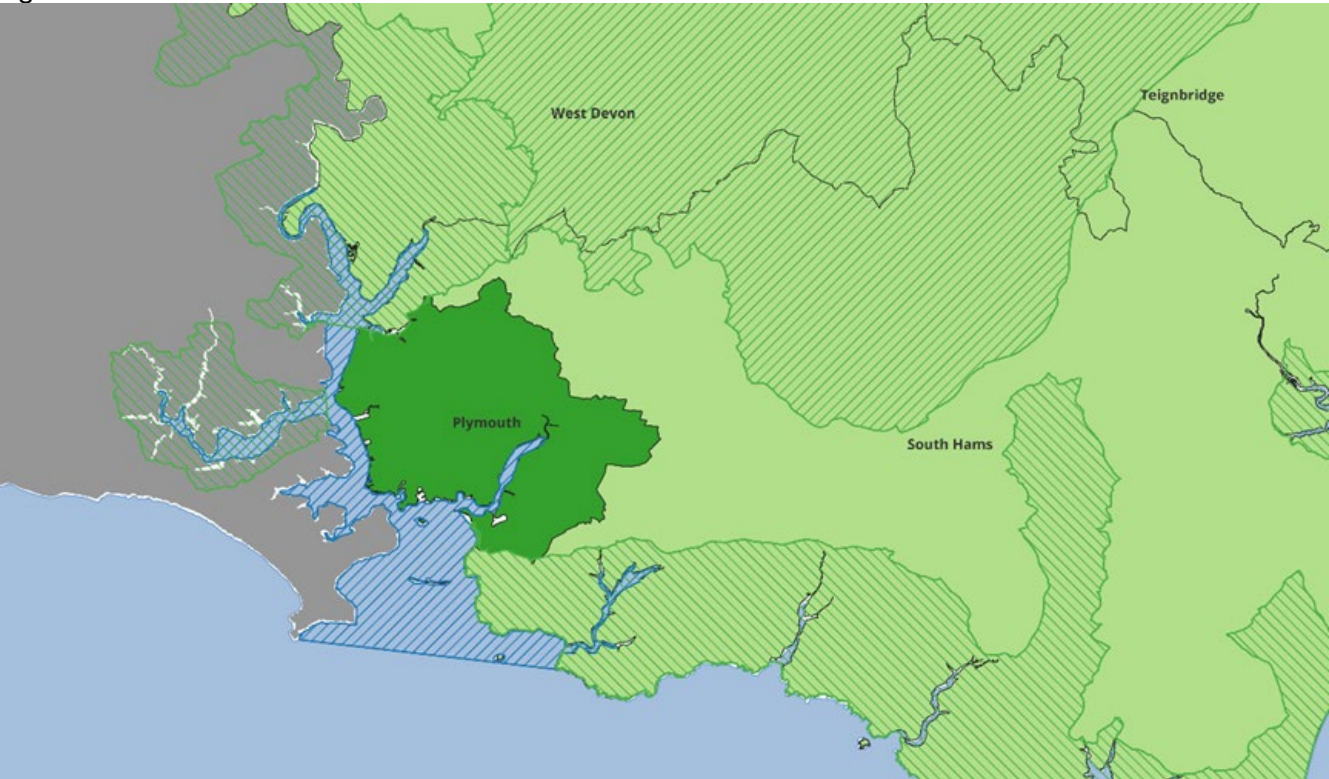


Summary Assessment

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 10.2



**Key Statistics**

Plymouth is a densely populated urban authority. It accommodates 270,000 people within a compact 79.9 km<sup>2</sup> 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**

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

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.

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

Where 1 equals most deprived 10% of Lower Super Output Areas, 10 equals least deprived 10%

Domain	Decile
Index of Multiple Deprivation (IMD)	4
Income Deprivation	5
Employment Deprivation	4
Education, Skills and Training	5
Health Deprivation and Disability	3
Crime	6
Barriers to Housing and Services	6
Living Environment	5
Income Deprivation Affecting Children (IDACI)	4
Income Deprivation Affecting Older People (IDAOPI)	5

Plymouth experiences significant overall deprivation (IMD decile 4), with acute challenges in both health (decile 3) and children's income deprivation (decile 4). In fact, its level of health deprivation is the most severe of any authority considered in this option. Addressing these needs effectively is made more difficult by the city's limited tax base and constrained population.

## Service Implications

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.

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.

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.

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

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**

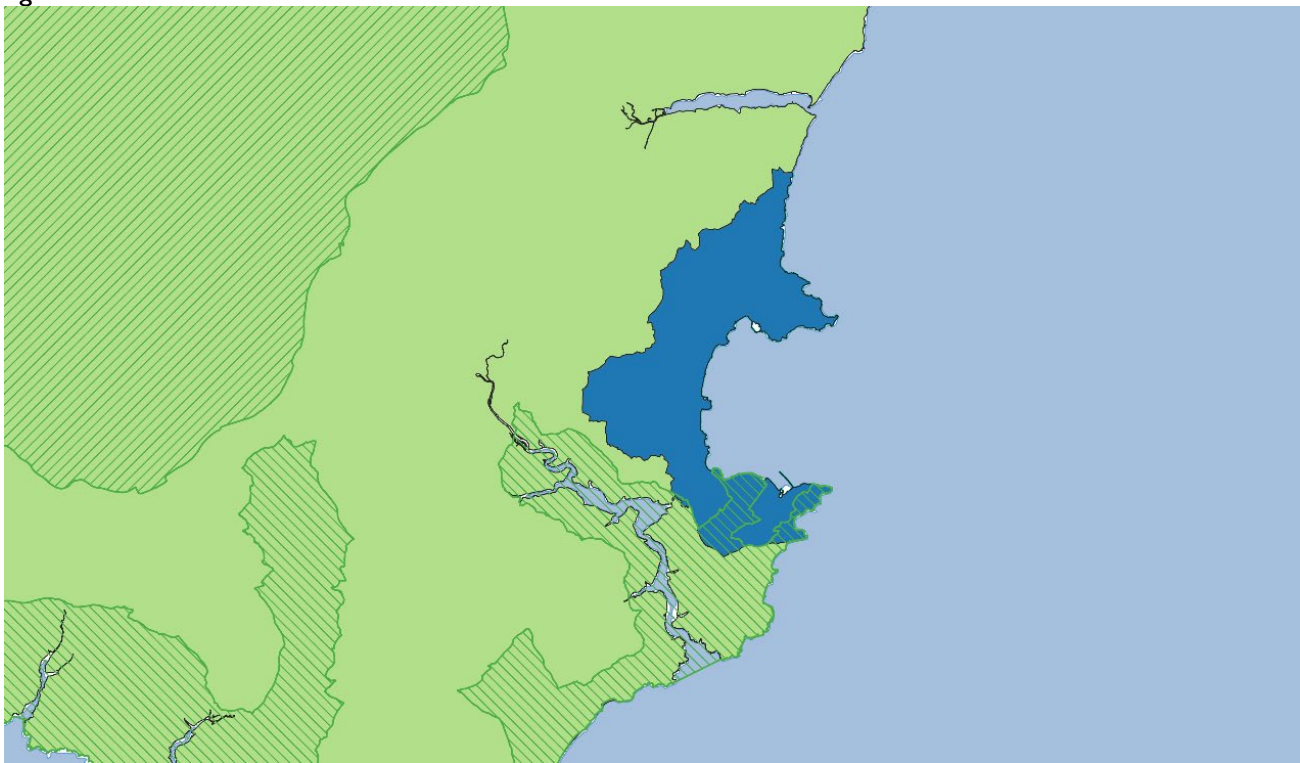
The small geographic area of 79.9 square kilometres prevents strategic growth and leaves Plymouth vulnerable to demographic and financial shocks. This option fails to address the city's fundamental requirement for expansion into its functional economic area.

DRAFT



Option One: Torbay

Figure 10.3



**Key Statistics**

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**

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

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%.

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

Where 1 equals most deprived 10% of Lower Super Output Areas, 10 equals least deprived 10%

Domain	Decile
Index of Multiple Deprivation (IMD)	4
Income Deprivation	4
Employment Deprivation	3
Education, Skills and Training	4
Health Deprivation and Disability	3
Crime	6
Barriers to Housing and Services	6
Living Environment	6
Income Deprivation Affecting Children (IDACI)	4
Income Deprivation Affecting Older People (IDAOPI)	4

Despite being the smallest authority in this option, with a population of approx. 139, 000 and a tax base of 49,254 Band D equivalent properties, Torbay manages disproportionately high service demands.

These demands are driven by a challenging demographic profile. The authority has the oldest population (26.7% over 65) and faces significant deprivation related to health (decile 3), employment (decile 3), and poverty affecting both children (IDACI decile 4) and older people (IDAOPI decile 4).

Service Implications

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)
- Integrated partnership with NHS for health and social care
- Proactive approach to improving employment, health, and wellbeing

Financial Analysis

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.

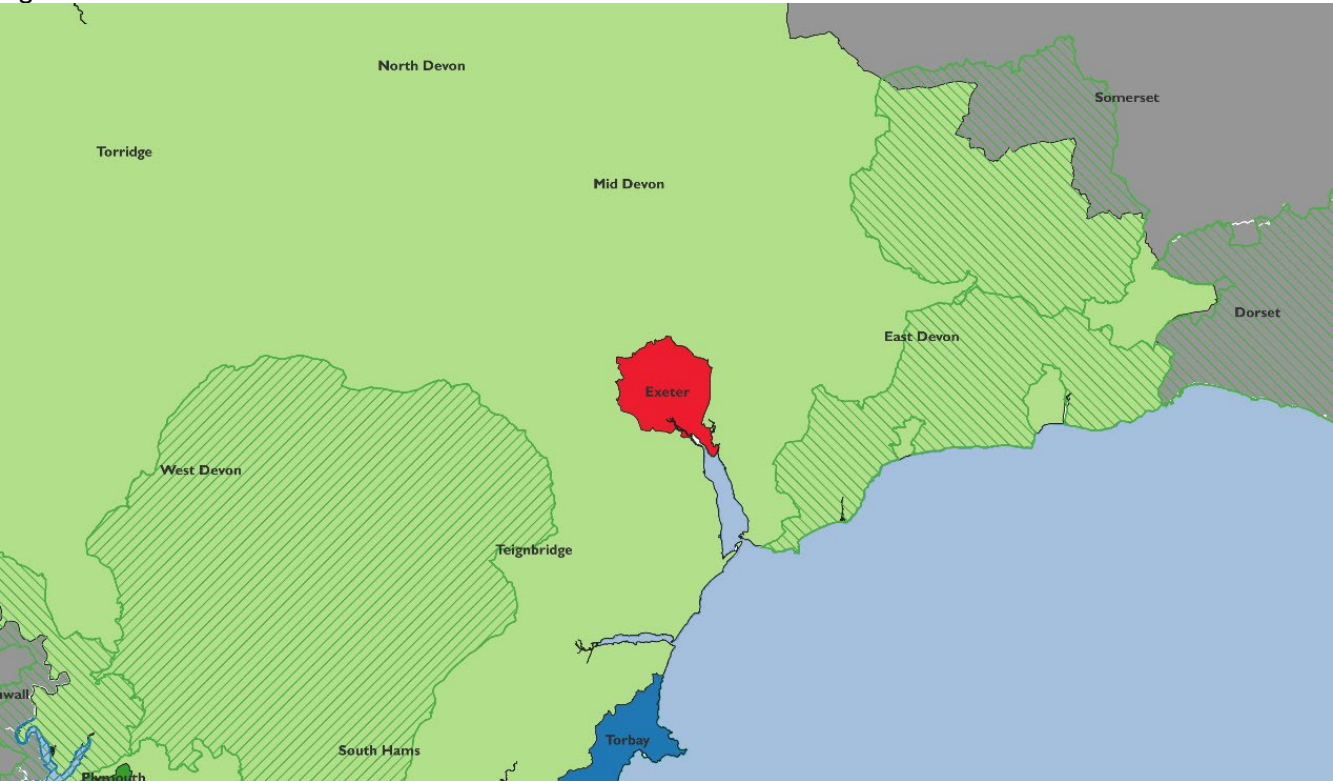
**Critical Assessment**

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.

DRAFT

Option One: Exeter

Figure 10.4



Key Statistics

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

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

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.

The city's geography is its primary constraint. At just 47.0 km<sup>2</sup>, 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

Where 1 equals most deprived 10% of Lower Super Output Areas, 10 equals least deprived 10%

Domain	Decile
<b>Index of Multiple Deprivation (IMD)</b>	7
<b>Income Deprivation</b>	6
<b>Employment Deprivation</b>	6
<b>Education, Skills and Training</b>	6
<b>Health Deprivation and Disability</b>	6
<b>Crime</b>	7
<b>Barriers to Housing and Services</b>	7
<b>Living Environment</b>	5
<b>Income Deprivation Affecting Children (IDACI)</b>	6
<b>Income Deprivation Affecting Older People (IDAOPI)</b>	6

Reflecting its character as an affluent university city, Exeter has the lowest level of deprivation in this option (IMD decile 7), with low levels across all domains.

## Service Implications

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

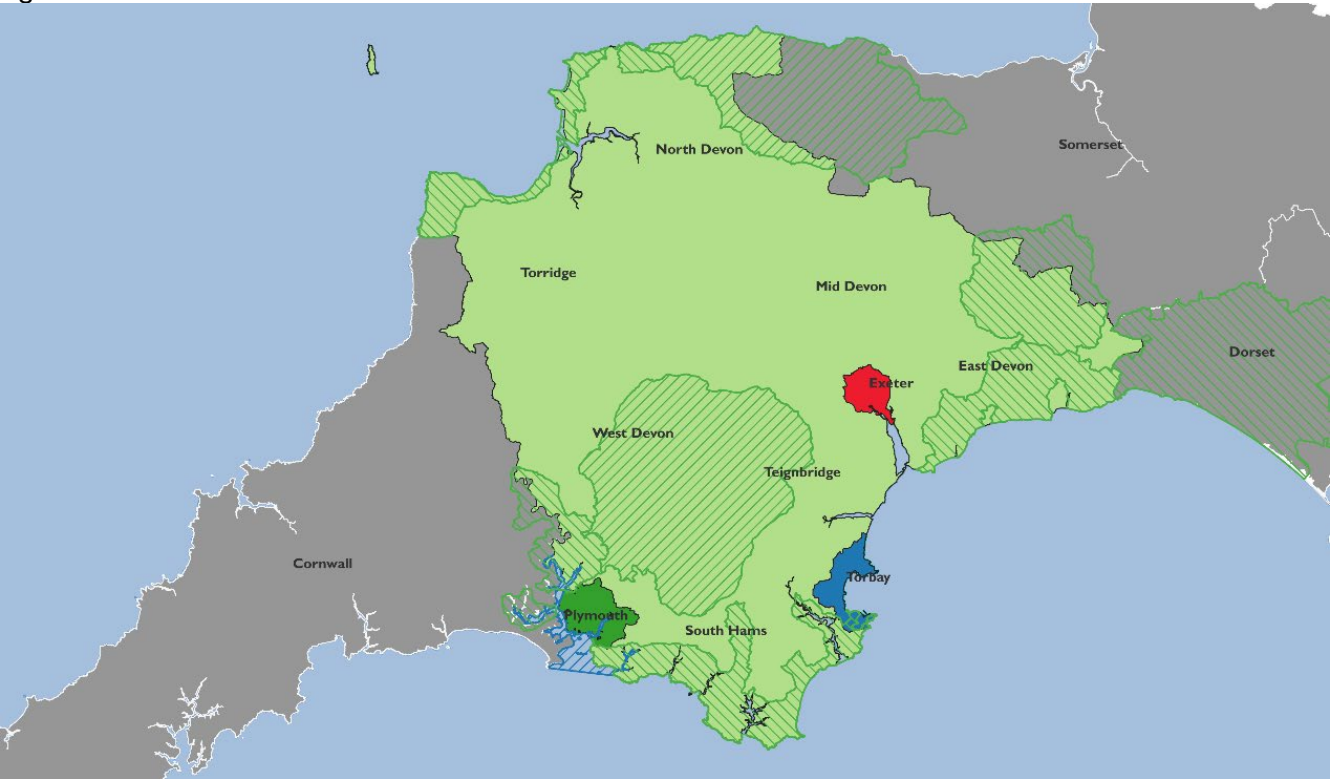
Exeter's financial position is the most constrained of the urban authorities. With a tax base of only 39,852 Band D equivalent properties serving 135,000 people, the authority has the smallest financial base despite being Devon's capital city. Whilst low deprivation reduces some service cost pressures, 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

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

Option One: Devon Coast and Countryside

Figure 10.5



**Key Statistics**

Devon is a large, rural authority with a population of approx. 690,000 spread across a vast 6,522.2 km<sup>2</sup> 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**

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

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.

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 km<sup>2</sup> area.

Indices of Deprivation

Where 1 equals most deprived 10% of Lower Super Output Areas, 10 equals least deprived 10%

Domain	Decile
Index of Multiple Deprivation (IMD)	6
Income Deprivation	6
Employment Deprivation	6
Education, Skills and Training	6
Health Deprivation and Disability	7
Crime	9
Barriers to Housing and Services	6
Living Environment	5
Income Deprivation Affecting Children (IDACI)	6
Income Deprivation Affecting Older People (IDAOPI)	7

Devon has a moderate overall deprivation level (IMD decile 6), with consistent scores across most domains. However, its rural character creates specific challenges, particularly in barriers to housing and services (decile 6) and the living environment (decile 5). The primary difficulty is cost, delivering services to a dispersed population across a vast 6,522 km<sup>2</sup> area is expensive, even when addressing moderate needs.

The scale of this rural context is stark when comparing population densities. At just 104 people per km<sup>2</sup>, Devon is 32 times less dense than Plymouth (3,311) and 27 times less dense than Torbay (2,215). This demonstrates the extreme operational differences between the large rural county and the compact urban authorities.

Service Implications

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.

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

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**

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

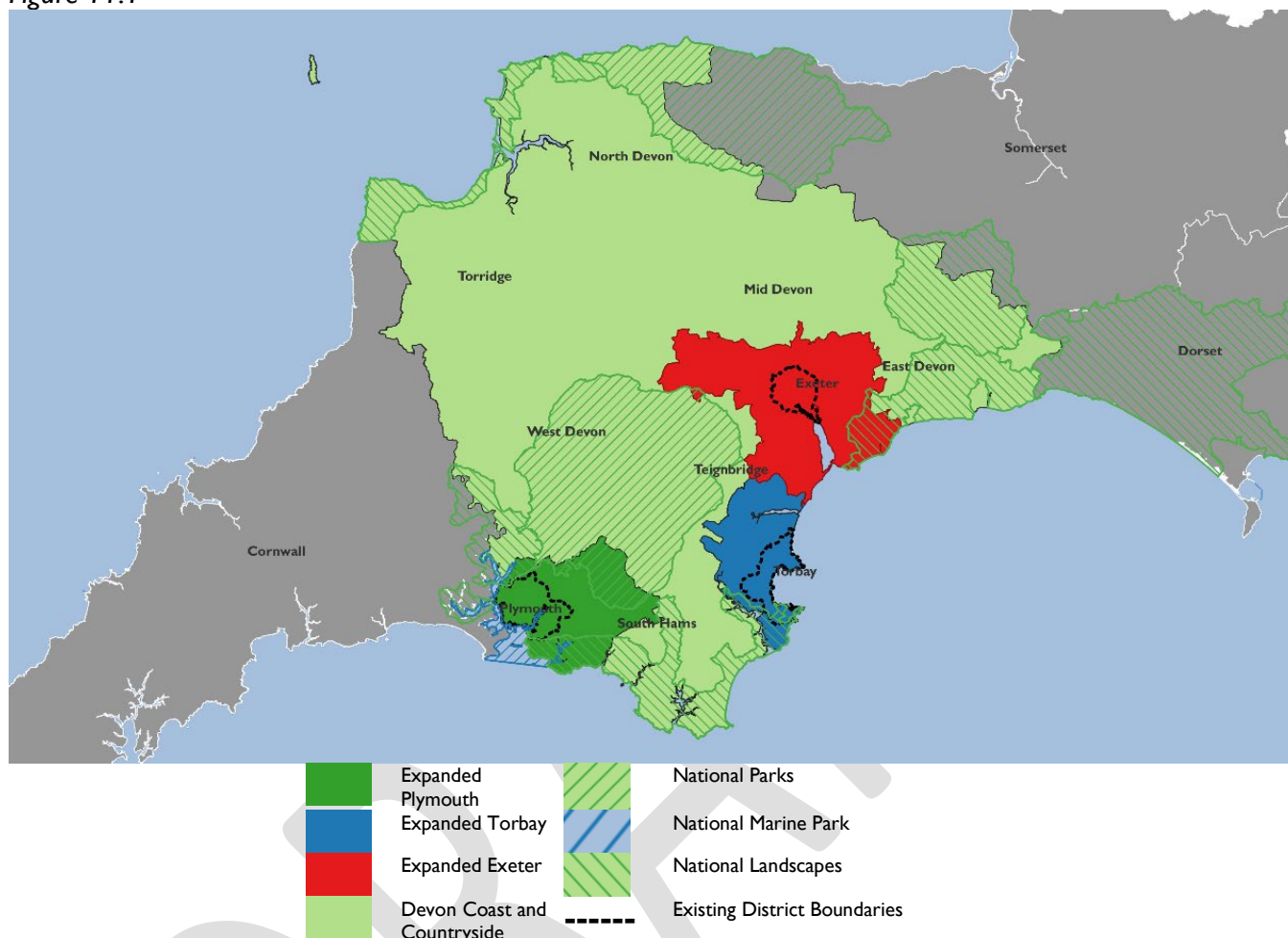
Table 10.1

Government Criteria	Assessment	Rationale
1. Single tier of local government	Met	<ul style="list-style-type: none"> <li>Creates 4 unitary councils using the existing principal authorities as building blocks.</li> <li>Meets the government 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 style="list-style-type: none"> <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 style="list-style-type: none"> <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 style="list-style-type: none"> <li>Provides for recognised and legally coherent administrative boundaries but does not respond to concerns and issues raised during the Big Conversation engagement</li> <li>Would require transitional arrangements would require more formal mechanism than a modified proposal.</li> </ul>
5. Support for devolution	Partially Met	<ul style="list-style-type: none"> <li>Creates a group of constituent authorities across Devon to link into a Peninsula Mayoral Strategic Authority (to which Cornwall Council could be added).</li> <li>In the absence of Ministerial modifications for Plymouth, Exeter and Torbay, this would place heavy reliance on the Spatial Development Strategy bringing forward deliverable and supported 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 style="list-style-type: none"> <li>Maintains a foundation of existing governance and neighbourhood engagement arrangements in each of the unitary authorities.</li> </ul>
<b>Plymouth Principles</b>		

1. Financial viability and population	Not Met	<ul style="list-style-type: none"> <li>The current population size is insufficient to generate the financial base required for long-term viability.</li> <li>The constrained population base and limited tax base create challenges.</li> </ul>
2. Character and identity	Met	The Base Case preserves Plymouth's distinct, compact urban character, which is reflected in high population density.
3. Respect for boundaries	Met	This option respects the boundaries of existing unitary authorities.
4. Dartmoor National Park	Met	The city's existing boundaries do not impinge upon Dartmoor National Park or create governance complexities for the Park Authority.
5. Parish boundaries	Met	This option proposes no changes and therefore does not alter any existing parish boundaries.
6. Sustainable growth and strategic role	Not Met	The geographic constraint of 79.9 square kilometres prevents strategic growth opportunities, inhibiting Plymouth's capacity to fulfil its strategic regional role.

## Option Two: Four Unitaries (Modified Case)

Figure 11.1



### Summary Assessment

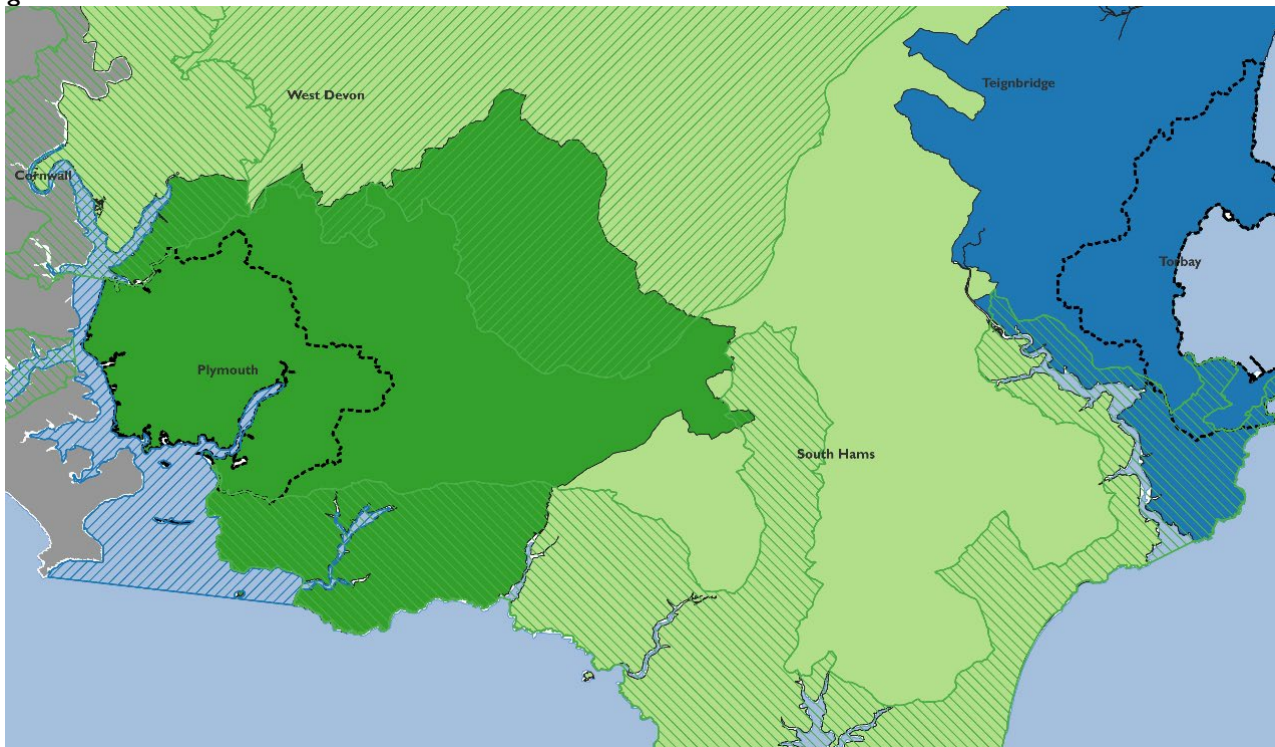
This is the preferred option as it meets all Government criteria and Plymouth's principles. It establishes four balanced and financially resilient authorities with populations ranging from approx. 220,000 to 450,000. The structure respects community identities, creates a clear distinction between urban and rural areas, and enables strategic capacity for growth and devolution.

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 11.2



Key Statistics

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.

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%

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%.

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

Where 1 equals most deprived 10% of Lower Super Output Areas, 10 equals least deprived 10%

Domain	Decile
Index of Multiple Deprivation (IMD)	4
Income Deprivation	5
Employment Deprivation	4
Education, Skills and Training	5
Health Deprivation and Disability	3
Crime	6
Barriers to Housing and Services	6
Living Environment	5
Income Deprivation Affecting Children (IDACI)	5
Income Deprivation Affecting Older People (IDAOPI)	5

Key challenges persist, health deprivation remains high at decile 3, requiring a continued focus on inequalities. While child poverty improves marginally (from IDACI 4 to 5), the level of need is still substantial. The crucial advantage of this model is that the enhanced population and tax base provide greater capacity to address these long-standing issues.

Service Implications

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.

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.

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.

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

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.

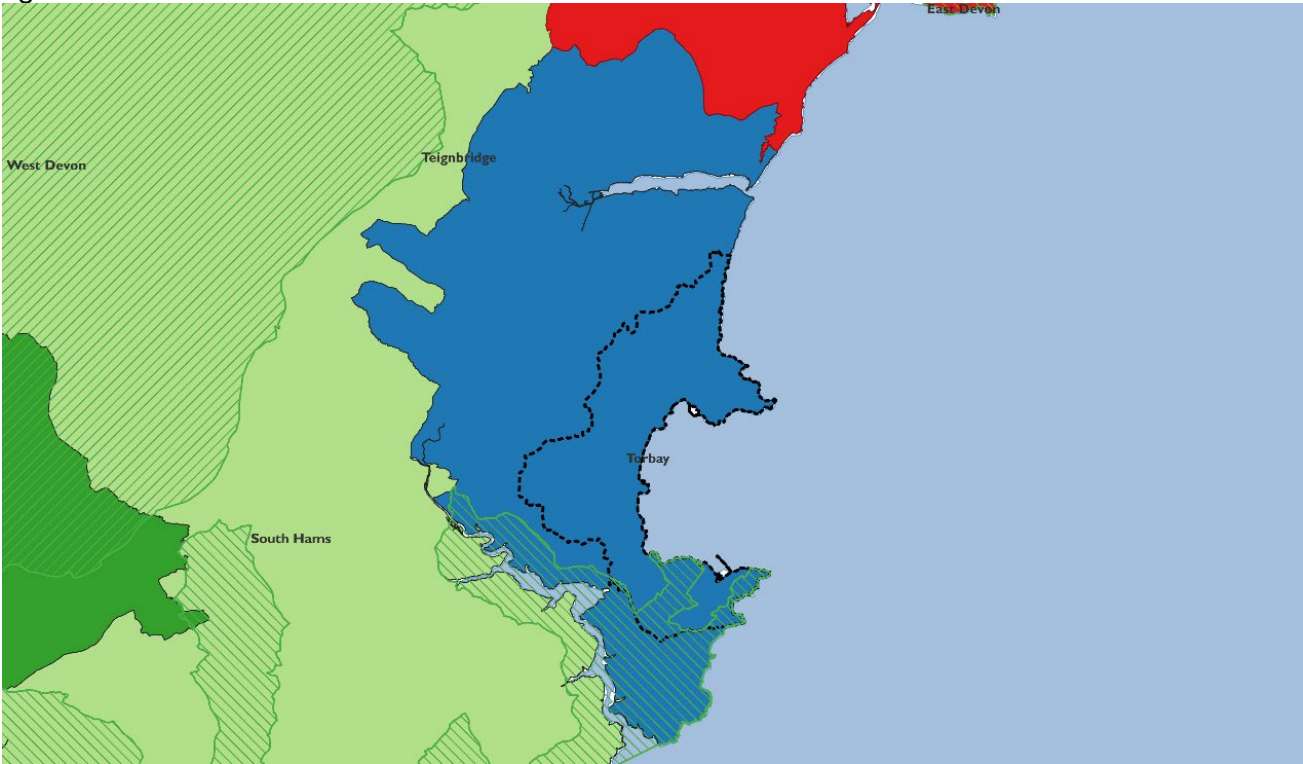
## Critical Assessment

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

Figure 11.3



Key Statistics

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.

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%

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.

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

Where 1 equals most deprived 10% of Lower Super Output Areas, 10 equals least deprived 10%

Domain	Decile
Index of Multiple Deprivation (IMD)	5
Income Deprivation	4
Employment Deprivation	4
Education, Skills and Training	5
Health Deprivation and Disability	5
Crime	7
Barriers to Housing and Services	6
Living Environment	6
Income Deprivation Affecting Children (IDACI)	5
Income Deprivation Affecting Older People (IDAOPI)	5

Torbay's deprivation profile improves across most domains. Most notable gains are in health (decile 3 to 5) and employment (decile 3 to 4). Whilst overall deprivation improves to IMD decile 5, significant needs remain. Crucially, the 62% tax base increase provides enhanced financial capacity to address these remaining challenges effectively.

Service Implications

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

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.

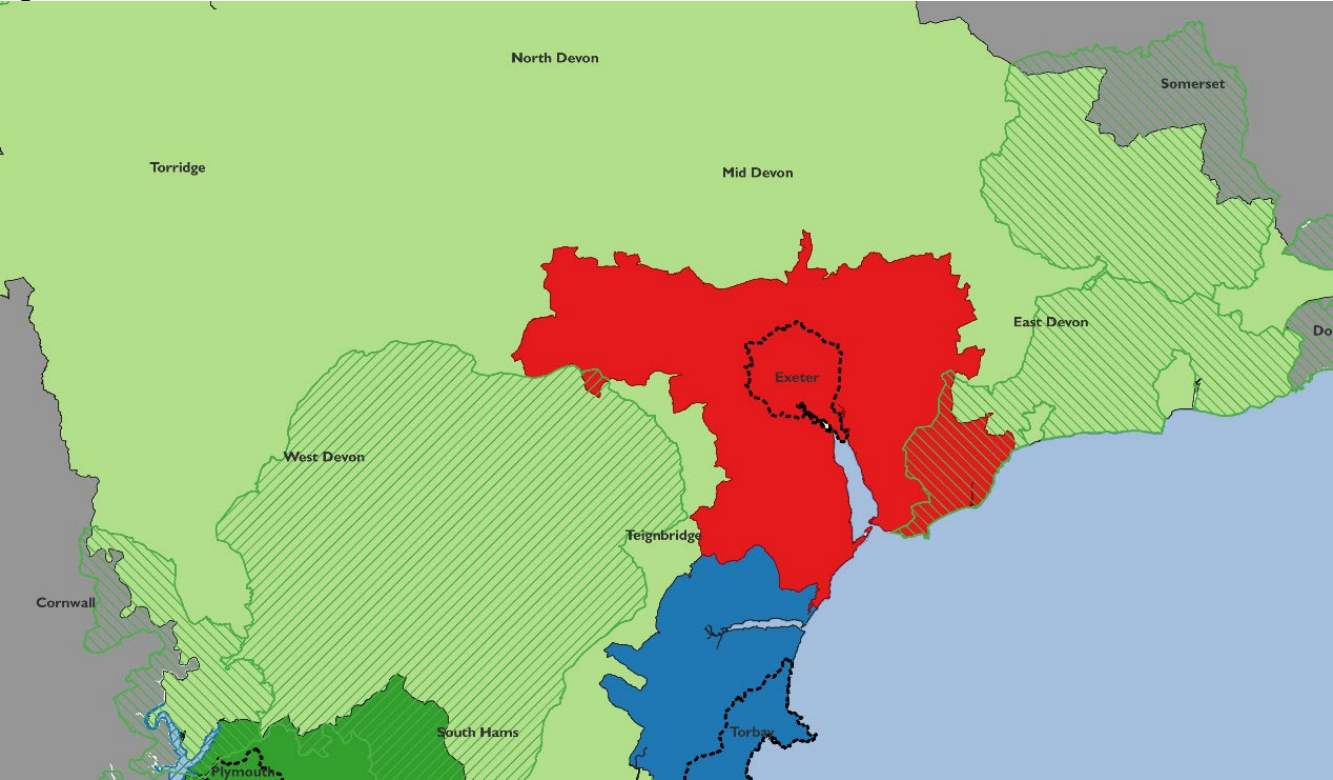
Critical Assessment

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 11.4



Key Statistics

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.

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%

The expanded Exeter model creates a balanced city-region authority by blending the young university city core with its surrounding suburban and rural areas.

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

Where 1 equals most deprived 10% of Lower Super Output Areas, 10 equals least deprived 10%

Domain	Decile
Index of Multiple Deprivation (IMD)	7
Income Deprivation	7
Employment Deprivation	6
Education, Skills and Training	6
Health Deprivation and Disability	7
Crime	8
Barriers to Housing and Services	7
Living Environment	5
Income Deprivation Affecting Children (IDACI)	7
Income Deprivation Affecting Older People (IDAOP)	6

By incorporating extension areas that complement the university city character, Expanded Exeter maintains a low deprivation profile.

Service Implications

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. The authority can fulfil its role as Devon's capital with services matching its regional status.

Financial Analysis

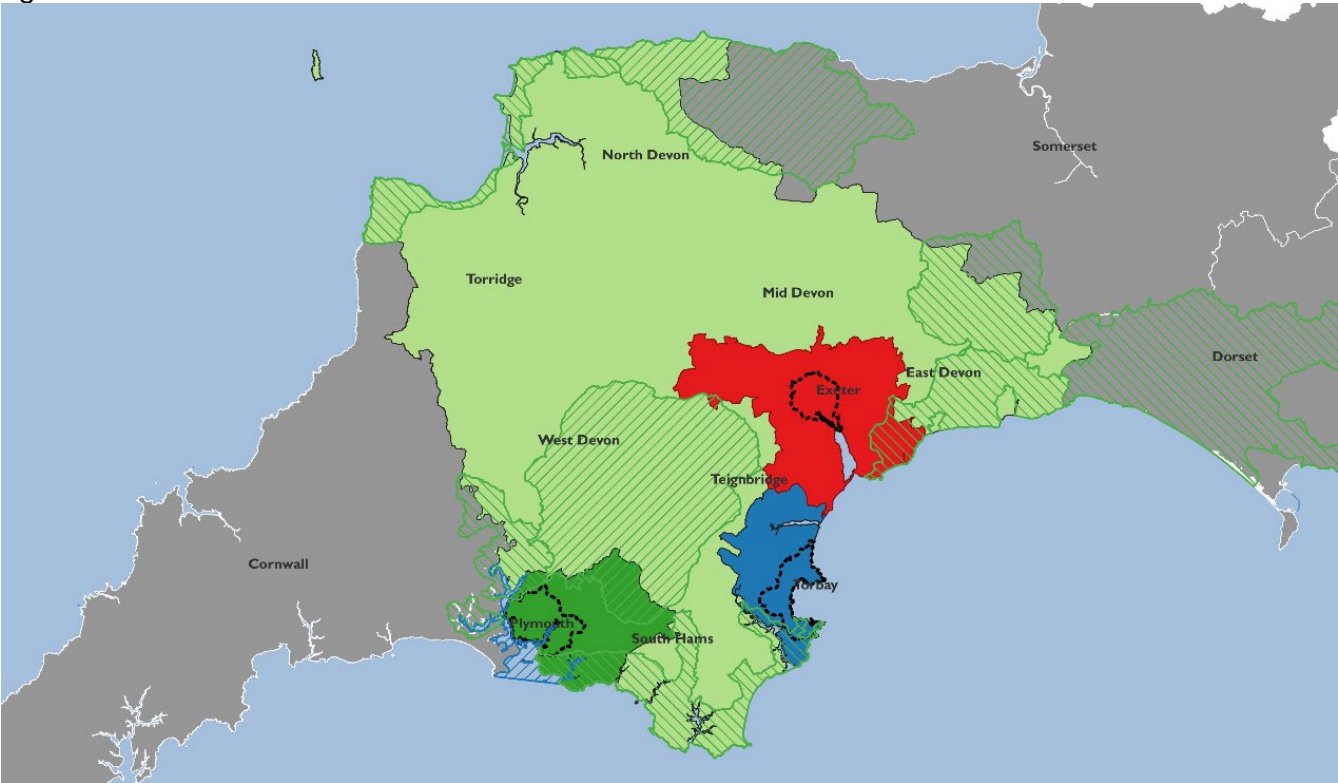
The transformation is dramatic. Tax base more than doubles, providing financial resources commensurate with Exeter's regional capital status. The increase in geographic area provides access to growth areas and commuter zones that expand the tax base. This creates capacity for strategic infrastructure investment, coherent transport planning, and effective housing delivery.

Critical Assessment

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 role as Devon's capital without compromising service quality or democratic accountability.

Option Two: Devon Coast and Countryside

Figure 11.5



**Key Statistics**

The proposed 'Devon Coast and Countryside' authority would have a population of approx. 450,000 distributed across a vast 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.

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**

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

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

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

Where 1 equals most deprived 10% of Lower Super Output Areas, 10 equals least deprived 10%

Domain	Decile
Index of Multiple Deprivation (IMD)	6
Income Deprivation	6
Employment Deprivation	6
Education, Skills and Training	6
Health Deprivation and Disability	7
Crime	9
Barriers to Housing and Services	5
Living Environment	4
Income Deprivation Affecting Children (IDACI)	6
Income Deprivation Affecting Older People (IDAOPI)	7

The 'Devon Coast and Countryside' authority has a moderate overall deprivation level (IMD decile 6). This score, however, reflects specific rural challenges, particularly in barriers to housing and services (decile 5) and the living environment (decile 4).

Service Implications

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

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

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 11.1

Government Criteria		
1. Single tier of local government	Met	The expanded Plymouth Council will be one of four new unitary councils in Devon, removing the existing two-tier arrangements in the expanded area.

2. Right size and financial resilience	Met	Creates a nationally significant, growth-orientated unitary council with a population of over 300,000. The tax base is sustainable and large enough to resist financial shocks.
3. High-quality, sustainable services	Met	Creates a coherent service geography for school admissions, transport, skills, and social care. It maximises opportunities for growth and simplifies residents' access to services.
4. Local collaboration and responsiveness	Met	A Four Unitary Model is supported by two existing unitary authorities and Exeter City Council. Provides for recognised and legally coherent administrative boundaries which reflect settlement patterns and functional economic relationships Extensions based on building blocks of Parish and Town Councils.
5. Support for devolution	Met	Creates a group of balanced constituent authorities to link into a Peninsula Mayoral Strategic Authority, allowing retained expertise to support a regional strategy.
6. Community engagement	Met	New neighbourhood governance arrangements to be developed. It protects existing parish and town council arrangements.
<b>Plymouth Principles</b>		
1. Financial viability and population	Met	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.
2. Character and identity	Met	Despite a 349% increase in land area the proposal sets out how we will preserve the character of all communities in the area.
3. Respect for boundaries	Met	The proposed boundary extension is logical and evidence-based, reflecting the functional geography of the Plymouth Growth Area, housing market areas, and travel-to-work patterns.
4. Dartmoor National Park	Met	The proposed new boundaries have been designed to be minimise impact on Dartmoor National Park.
5. Parish boundaries	Met	The principle of using whole, undivided parishes as the building blocks for the

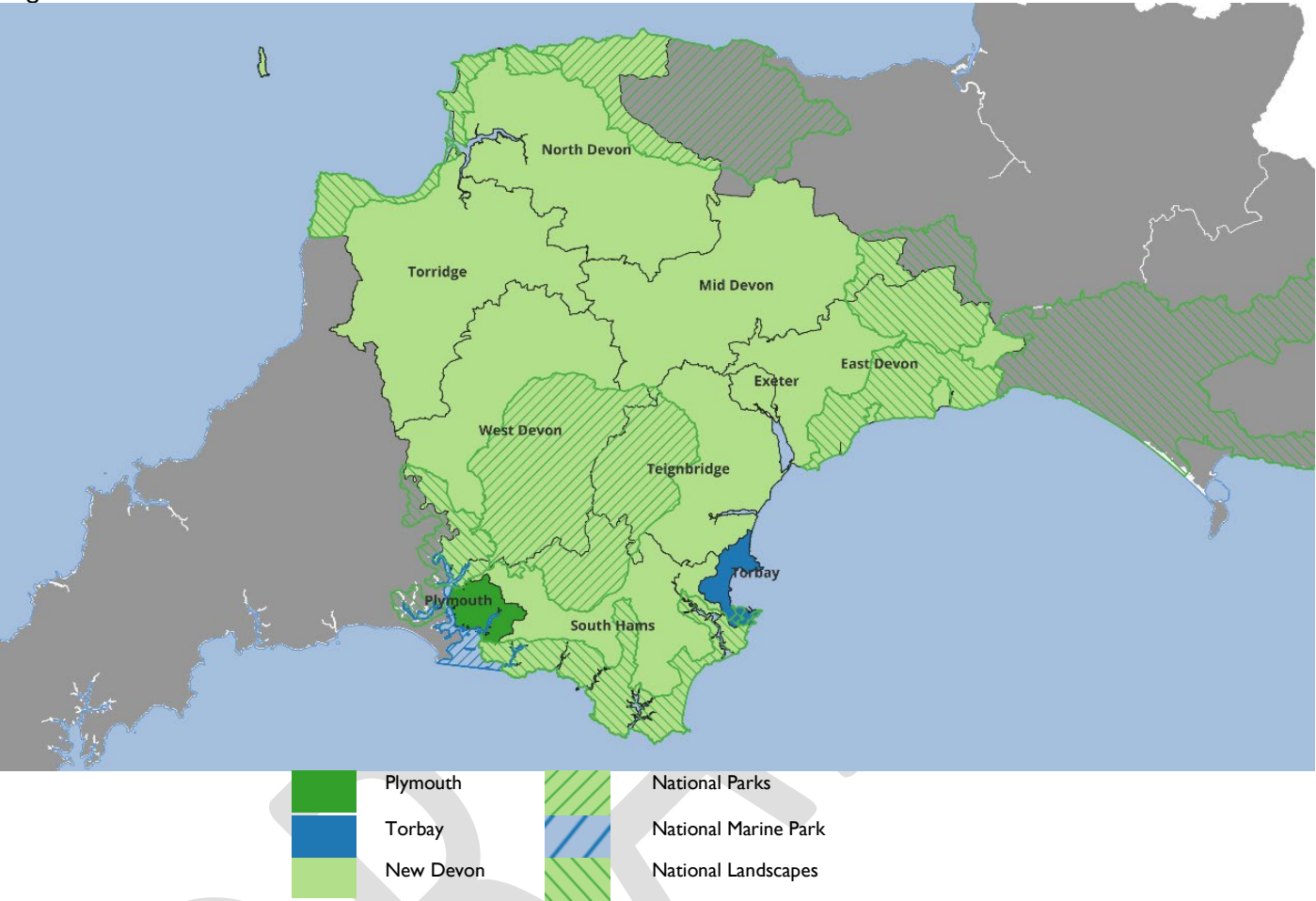
		extension is a cornerstone of this option.
6. Sustainable growth and strategic role	Met	The expansion of the city's area provides the "planning capacity for sustainable growth" that is critically absent in the Base Case, unlocking the city's potential.

DRAFT



## Option Three: Three Unitaries (New Devon)

Figure 12.1



### Summary Assessment

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.

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.

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.

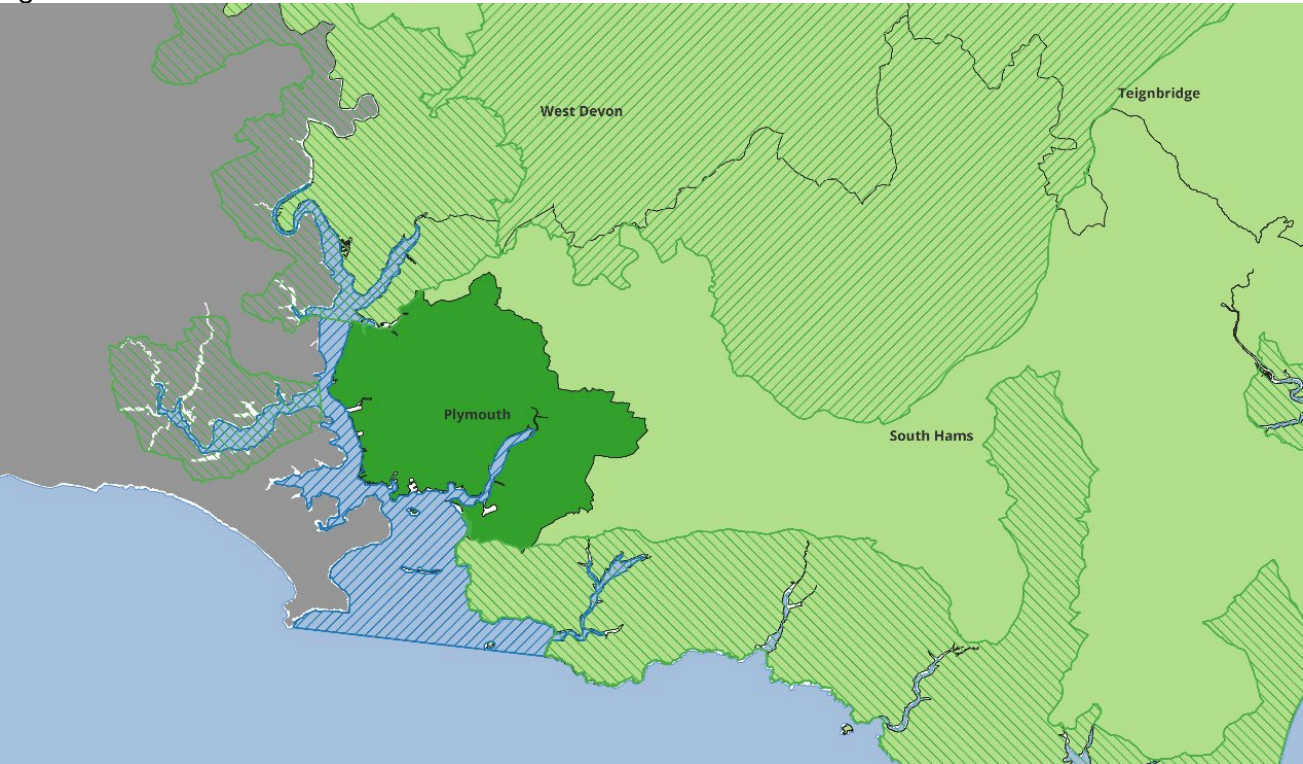
This option maintains administrative clarity through established boundaries but does not fully create the foundation for optimised strategic growth or balanced regional partnership.

DRAFT



Option Three: Plymouth

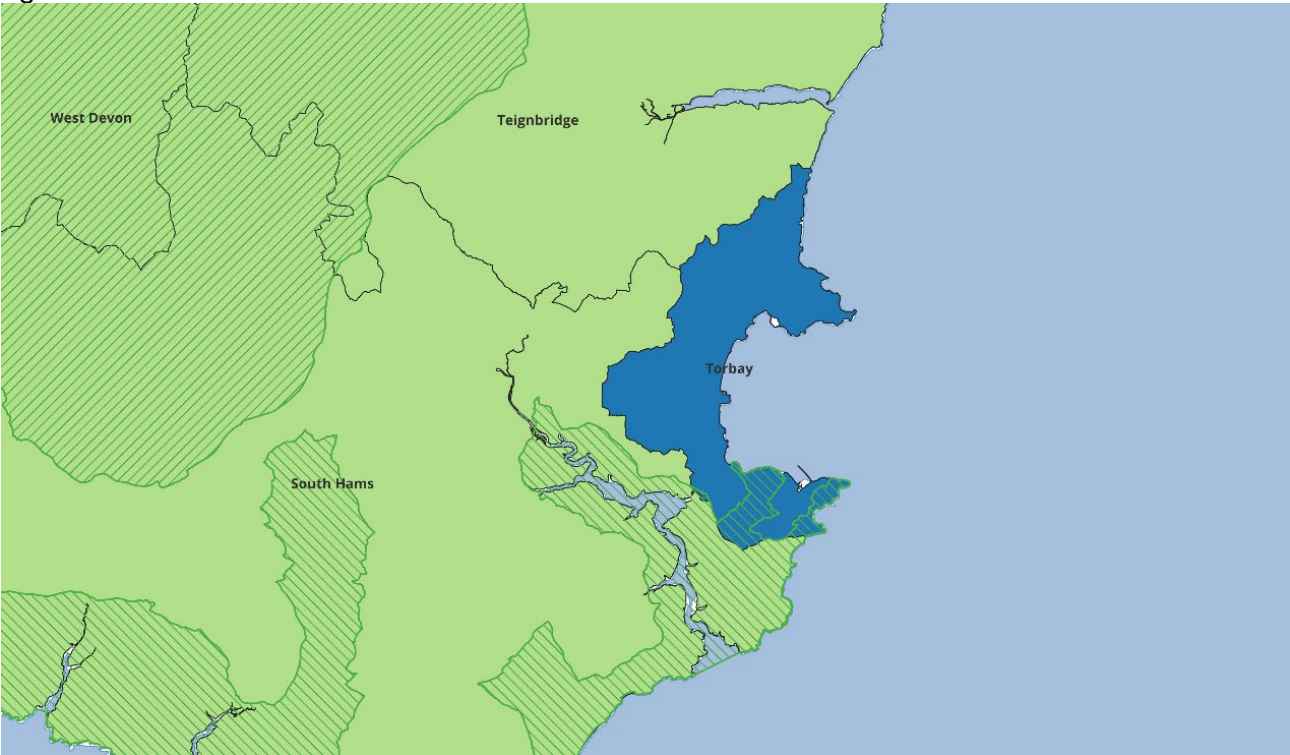
Figure 12.2



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

Option Three: Torbay

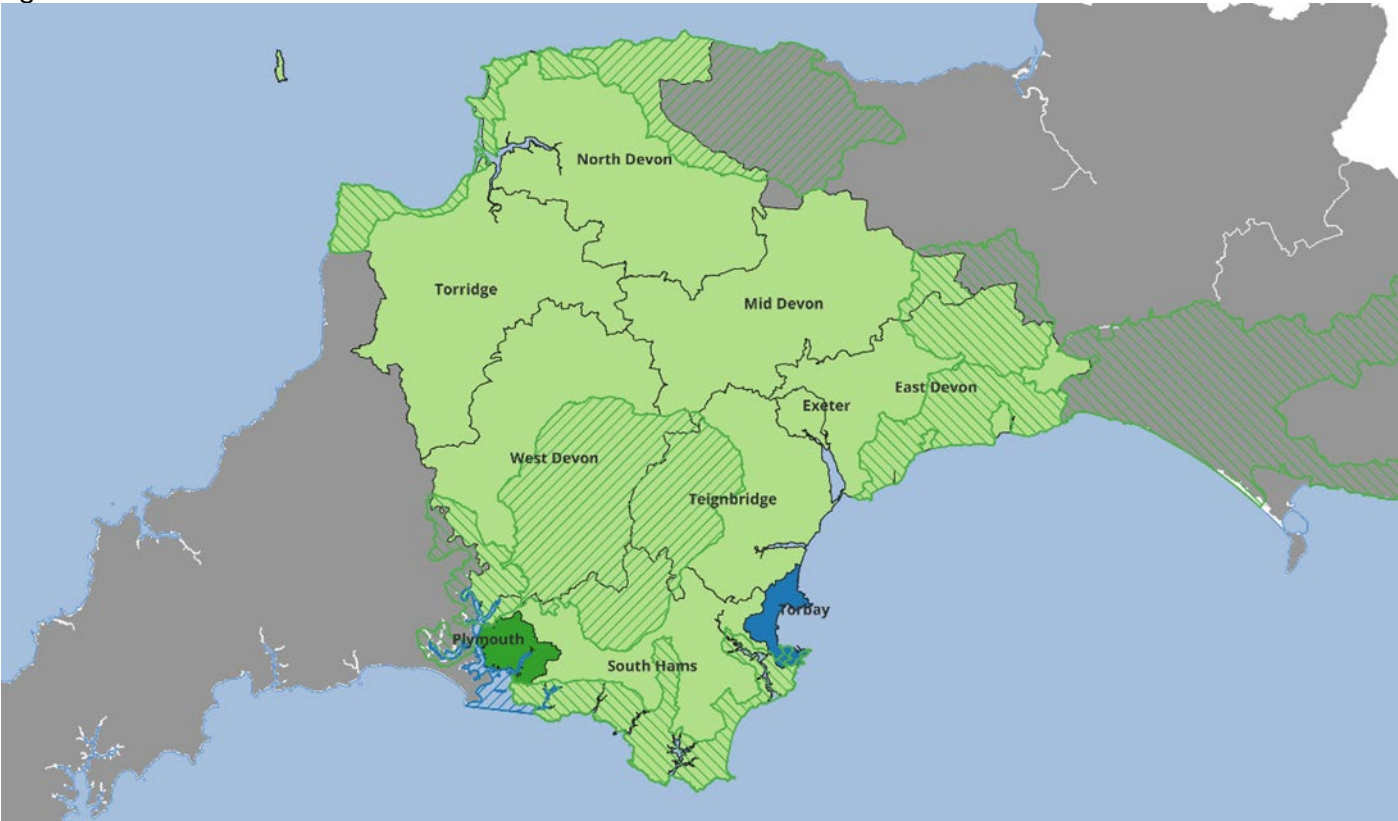
Figure 12.3



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

Option Three: Devon County Council Area

Figure 12.4



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%

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

Where 1 equals most deprived 10% of Lower Super Output Areas, 10 equals least deprived 10%

Domain	Decile
Index of Multiple Deprivation (IMD)	6
Income Deprivation	6
Employment Deprivation	6
Education, Skills and Training	6
Health Deprivation and Disability	7
Crime	8
Barriers to Housing and Services	6
Living Environment	5
Income Deprivation Affecting Children (IDACI)	6
Income Deprivation Affecting Older People (IDAOPI)	6

New Devon encompasses both Exeter (with low deprivation at IMD decile 7) and rural areas (with moderate deprivation at IMD decile 6). This creates an authority with mixed deprivation profile where Exeter's urban needs and rural Devon's dispersed service challenges must be managed within a single structure.

Service Implications

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

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

This option creates a fundamental democratic deficit by submerging Exeter (Devon's capital and fastest-growing city) within a vast authority where the capital 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 12.1

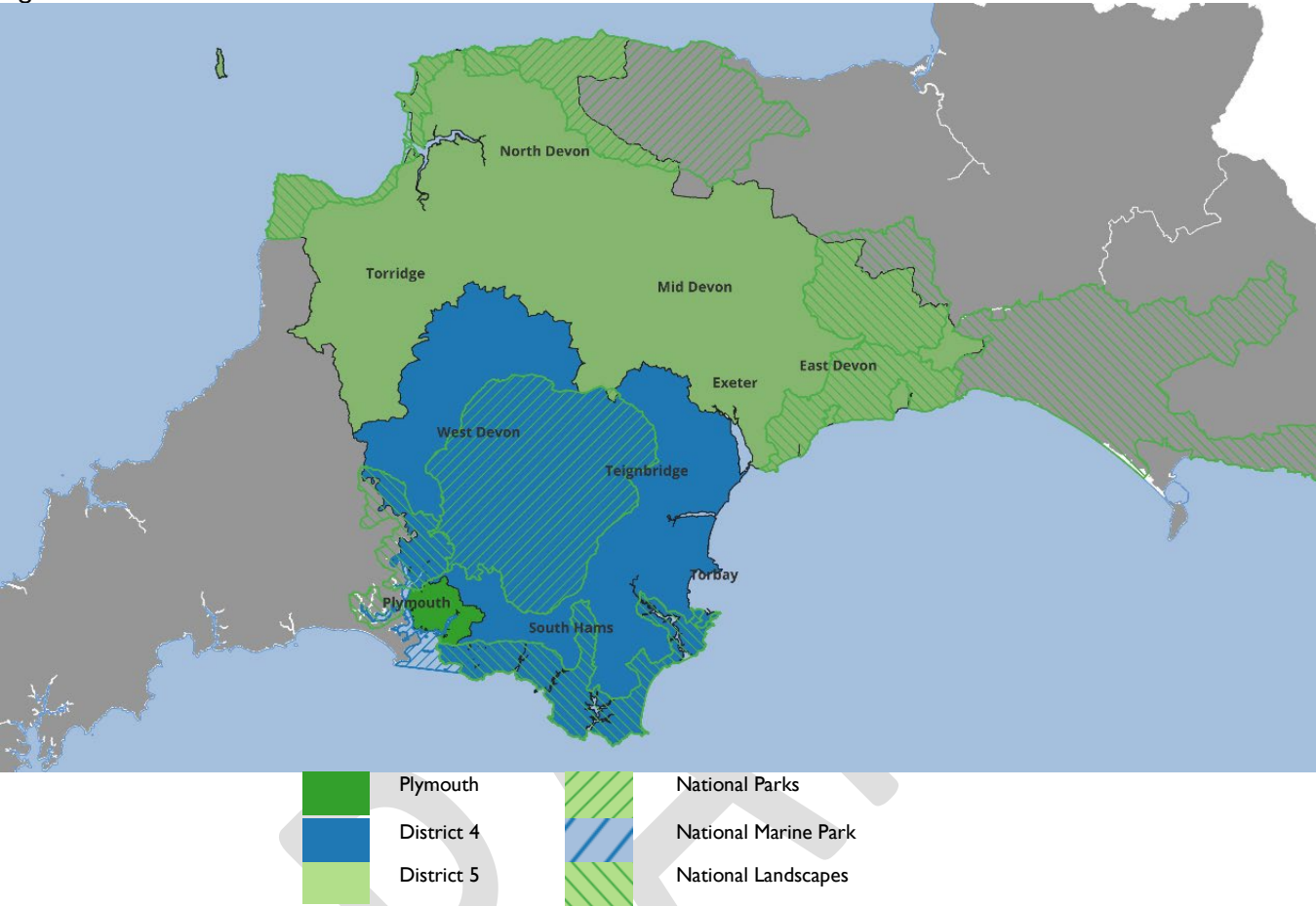
Criterion	Assessment	Rationale
1. Single tier of local government	Partially Met	Creates three legally recognised unitary authorities, removing the two-tier structure. However, extreme size variation (6:1 ratio) undermines equality between authorities and creates an unbalanced foundation for partnership working.
2. Right size and financial resilience	Not Met	Plymouth at 270,000 lacks strategic growth capacity. Devon at 811,658 may be too large for effective local democracy.
3. High-quality, sustainable services	Partially Met	Torbay lacks scale and Plymouth is constrained from strategic development, and extreme size variation makes collaboration and standardisation very difficult.
4. Local collaboration and responsiveness	Not Met	This option is supported by only one local authority. Devon's dominance risks marginalising Plymouth and Torbay in partnership working. Integrated Care System, police, fire and devolution arrangements all face challenges from size imbalances.
5. Support for devolution	Not Met	Creates unequal partners for devolution, with Devon dominating at 66.8% of population. Plymouth cannot represent its functional economic area. Difficult foundation for balanced Mayoral Authority or combined authority arrangements.
6. Community engagement	Partially Met	Uses established principal authority boundaries with clear democratic legitimacy. However, Devon's scale (811,000) risks weakening local democratic connection. Residents in large rural wards may feel distant from decision-making.
<b>Plymouth Principles</b>		
1. Financial viability and population	Not Met	Plymouth remains at a constrained 270,000 population (approximately). Cannot grow tax base or capture development value. Freeport and growth benefits accrue to Devon not Plymouth. Long-term financial sustainability fundamentally undermined.
2. Character and identity	Not Met	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 km <sup>2</sup> , and this option prevents recognition of those natural relationships.
3. Respect for boundaries	<b>Partially Met</b>	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.
4. Dartmoor National Park	<b>Met</b>	Plymouth's existing boundaries do not impinge upon Dartmoor National Park.
5. Parish boundaries	<b>Met</b>	No changes to parish boundaries as no boundary extensions proposed.
6. Sustainable growth and strategic role	<b>Not Met</b>	Plymouth cannot deliver Joint Local Plan, cannot govern Freeport effectively, cannot implement Metro proposals, cannot plan for functional economic area. Fundamentally fails to enable Plymouth's growth and regional role.



# Option Four: Three Unitaries (District Grouping)

Figure 13.1

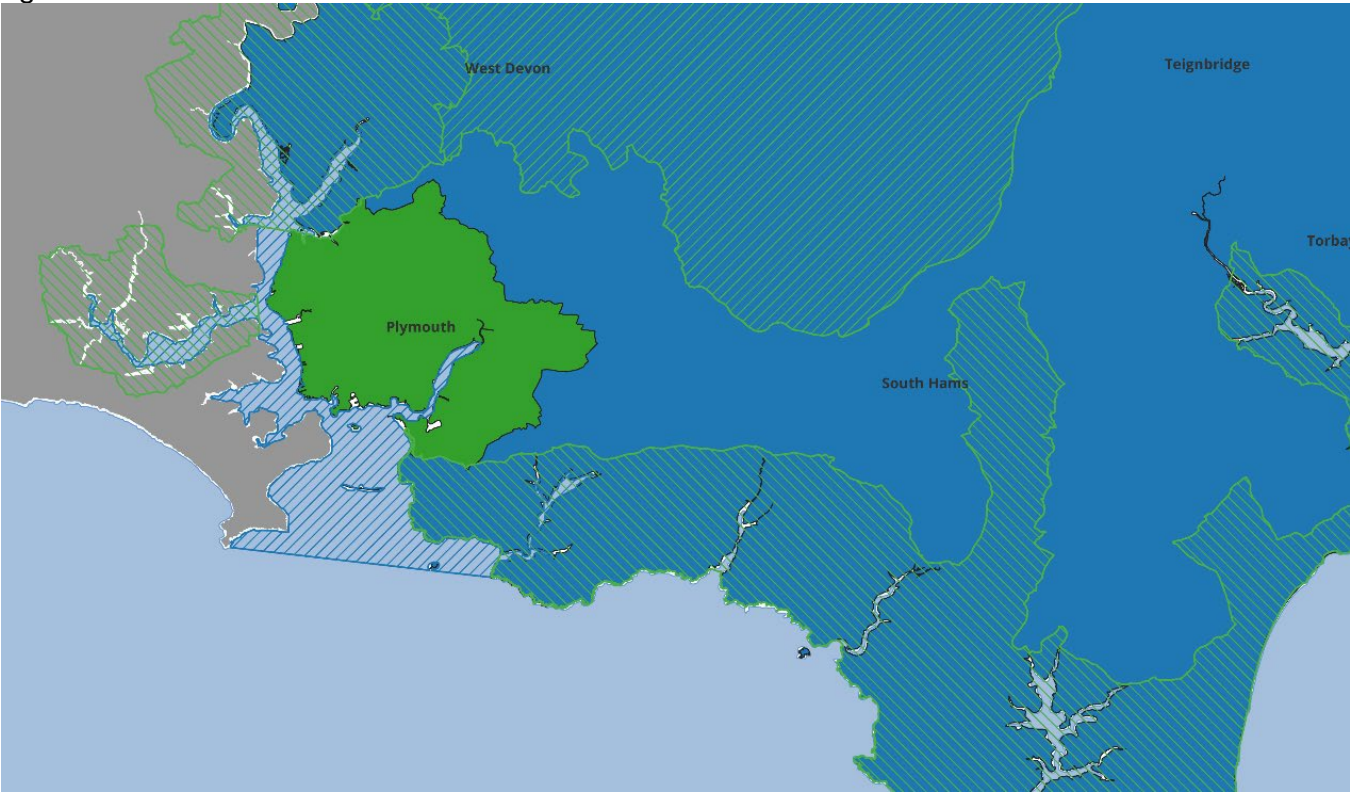


## Summary Assessment

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 13.2

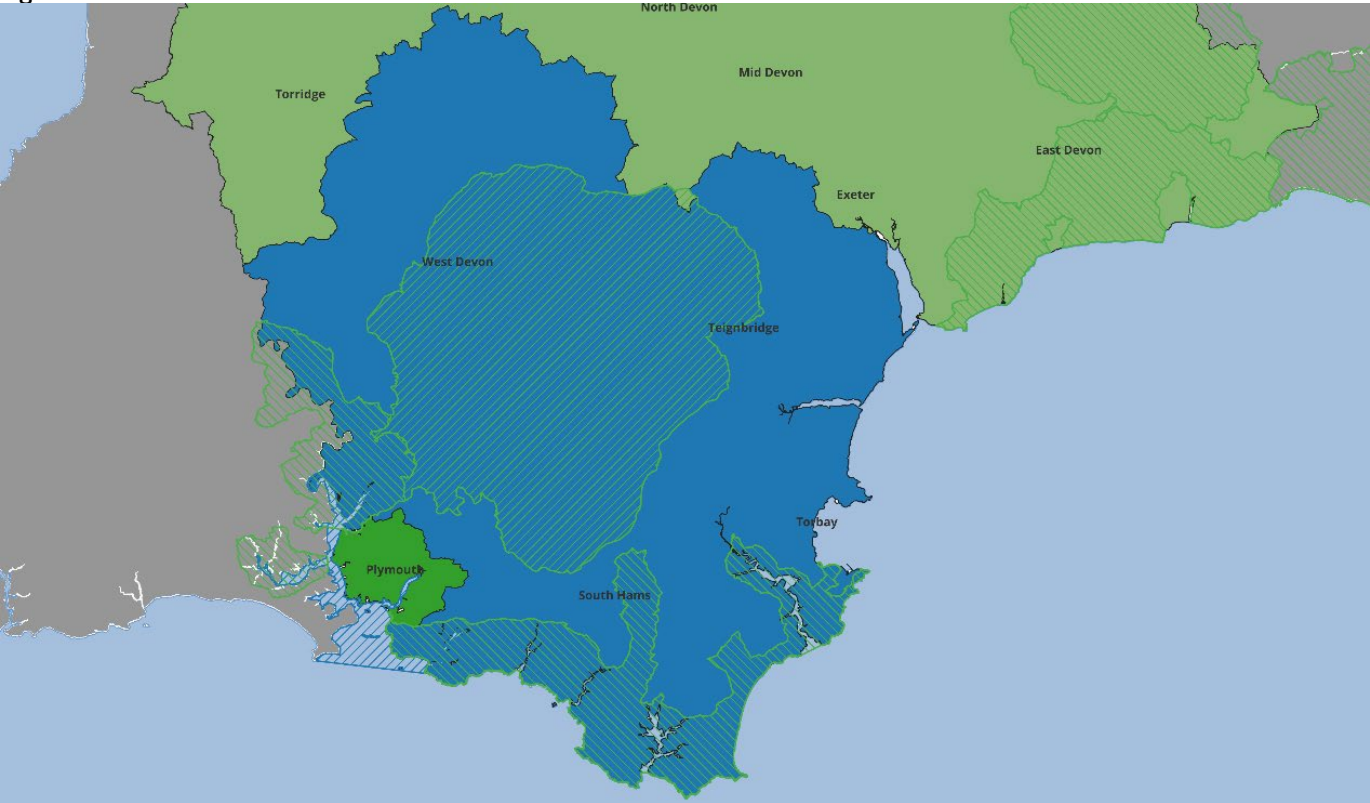


The impact on Plymouth is as expressed in the base case.



Option Four: Four District Unitary

Figure 13.3



Key Statistics

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

Where 1 equals most deprived 10% of Lower Super Output Areas, 10 equals least deprived 10%

Domain	Decile
Index of Multiple Deprivation (IMD)	6
Income Deprivation	5
Employment Deprivation	5

**Health Deprivation and Disability****6**

Four District Unitary's predominantly rural and more affluent character is reflected in its deprivation levels. The authority has a moderate-to-low deprivation score (IMD decile 6), making it significantly less deprived than Plymouth (IMD decile 4).

**Service Implications**

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**

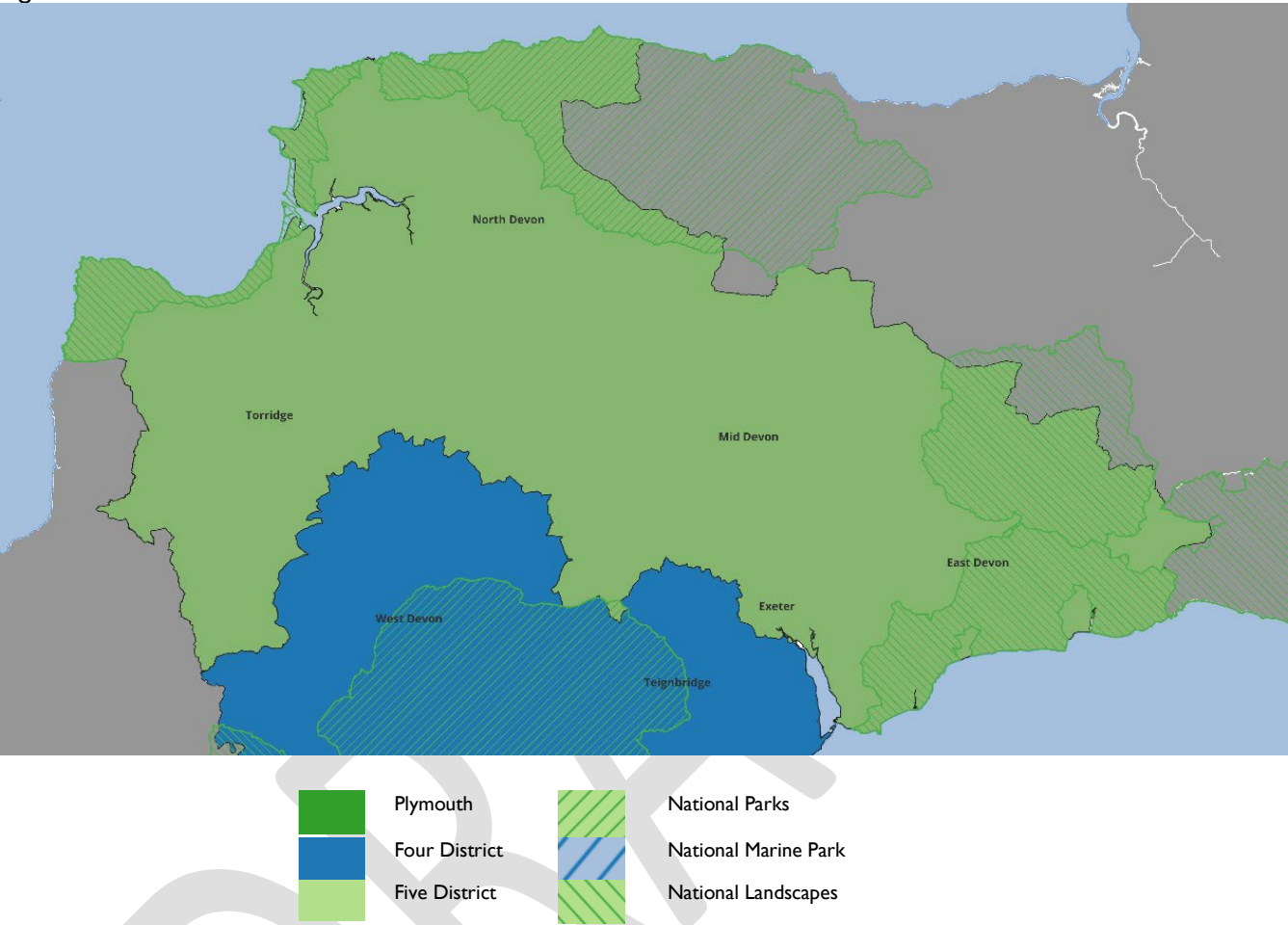
A key concern is the significant imbalance this creates with Plymouth. The district has a population 58% larger than Plymouth and a council tax base 117% greater. However, its population has lower levels of deprivation, indicating comparatively lower need for intensive public services. This arrangement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

**Critical Assessment**

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 13.4



Key Statistics

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

Where 1 equals most deprived 10% of Lower Super Output Areas, 10 equals least deprived 10%

Domain	Decile
Index of Multiple Deprivation (IMD)	6
Income Deprivation	6
Employment Deprivation	6
Health Deprivation and Disability	7

With an IMD decile of 6, District 5 shows moderate to low deprivation, reflecting its predominantly rural and more affluent character.

Service Implications

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

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

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 13.1

Government Criteria	Assessment	Rationale
1. Single tier of local government	Met	The model adheres to the principle of creating single-tier authorities.
2. Right size and financial resilience	Not Met	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.
3. High-quality, sustainable services	Not Met	All service sustainability challenges of the Base Case remain for Plymouth, while the model allocates vastly superior resources to new, more affluent districts.
4. Local collaboration and responsiveness	Not Met	This option is supported by 7 of the 8 districts authorities in Devon. Boundaries slice through existing urban extensions such as those surrounding Exeter and Plymouth, paying no regard to the functional relationships between communities in proximity.
5. Support for devolution	Not Met	This model would create an even more imbalanced partnership for devolution. Plymouth would be a minor partner, dwarfed by the two new super-districts.
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.
<b>Plymouth Principles</b>		
1. Financial viability and population	Not Met	This option fails for the same reasons as the Base Case, with the added inequity of being left behind while surrounding areas are strengthened.
2. Character and identity	Met	Plymouth's own distinct urban character is preserved, but in a state of isolation.
3. Respect for boundaries	Not Met	The option creates arbitrary boundaries with unclear rationale based only on former District Boundaries.
4. Dartmoor National Park	Partially Met	The creation of vast new districts bordering the National Park would likely introduce new and complex governance relationships for the Park Authority.
5. Parish boundaries	Met	As amalgamations of former district council areas parish Boundaries would be protected.

6. Sustainable growth and strategic role	Not Met	This option "would prevent Plymouth playing a leading city role for the South West" by permanently confining it and surrounding it with larger, richer authorities.
--	---------	---

DRAFT

## Rejected Options

- Option 3 (1-4-5 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 1) 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 Four Unitary Model (Option 2) emerges as the most logical, evidence-based, and strategically sound path forward. It is the strongest option for providing Plymouth 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 Plymouth 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 real-world 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 Ivybridge, 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 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'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 co-design 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.

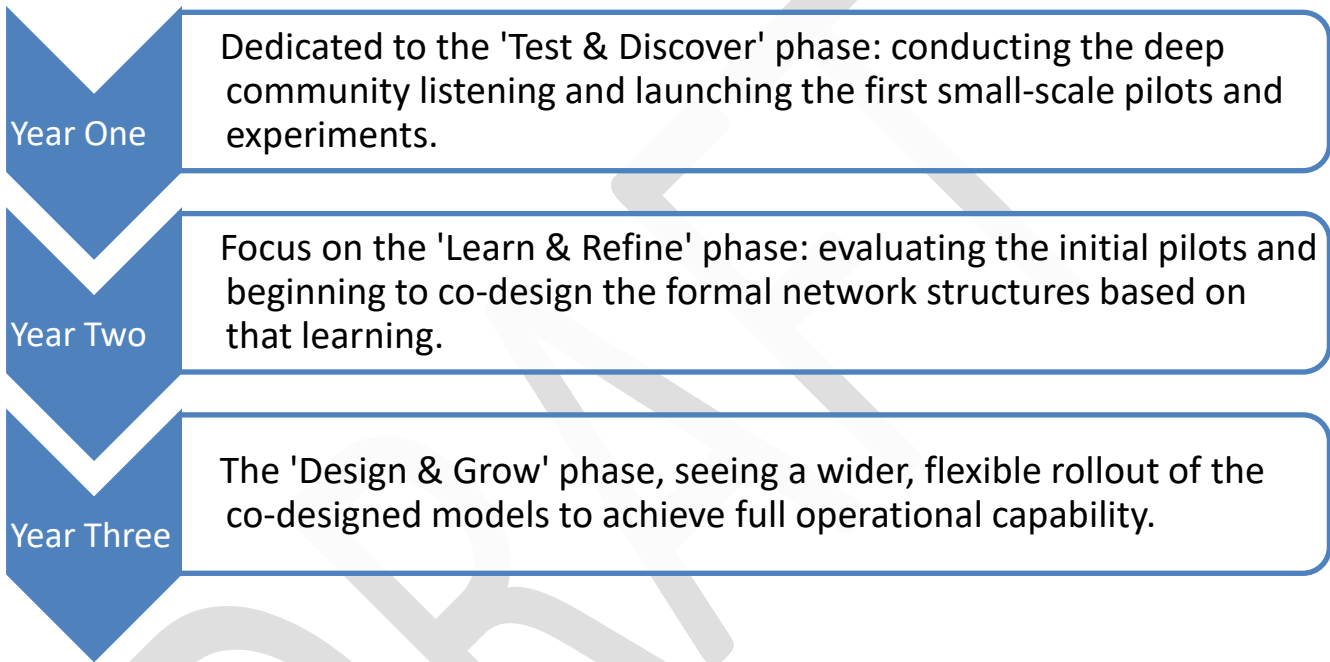
## Training and Capacity Building

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 14.1



**Our Commitment to the Future**

15.39. 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
  - 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 Special Education Need and Disabilities (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 Authority** - Extending a proven model of integrated service delivery across its natural community and economic area.
  - **An expanded Torbay Authority** - 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. The Start for Life and Family Hubs Programme supporting the first 1,001 days of child development represents established practice in early intervention that can be implemented consistently across the extended area.

### **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 1E), 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.

## 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 16.1 and 16.2 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 16.1), the proposed Torbay and Exeter unitaries are relatively small in overall resource terms, figure 16.2 shows how the modified proposal puts all of the proposed councils into the middle quartiles when compared to existing English unitaries.

Figure 16.1

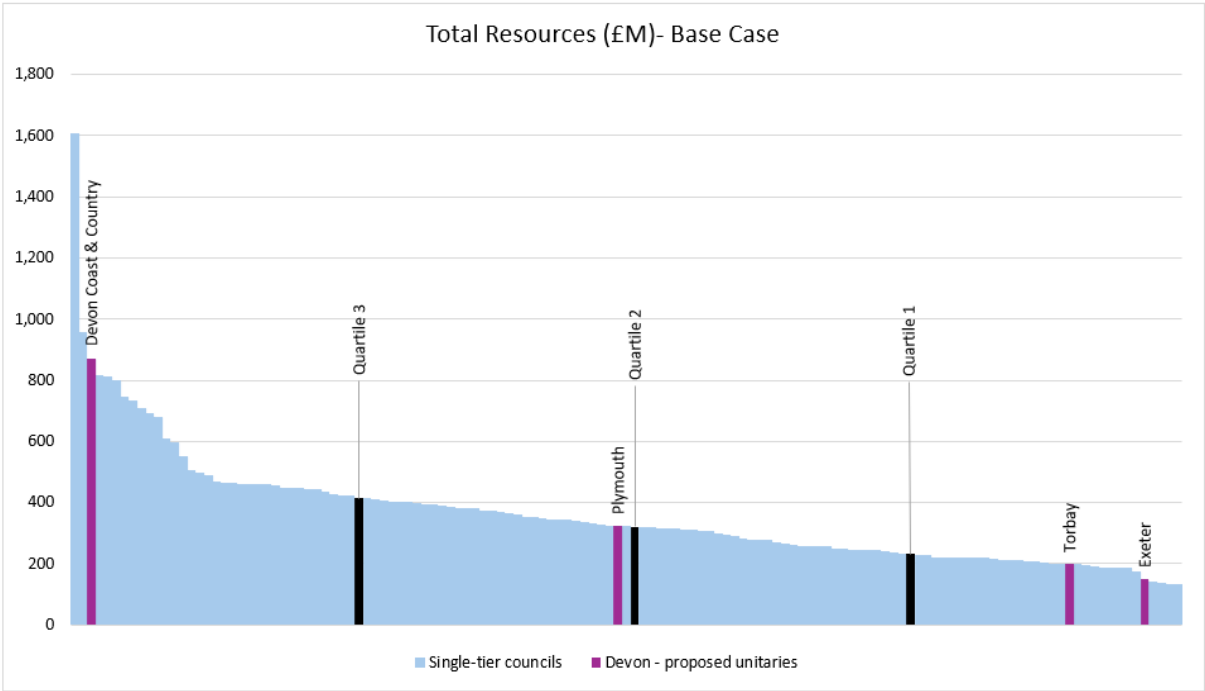
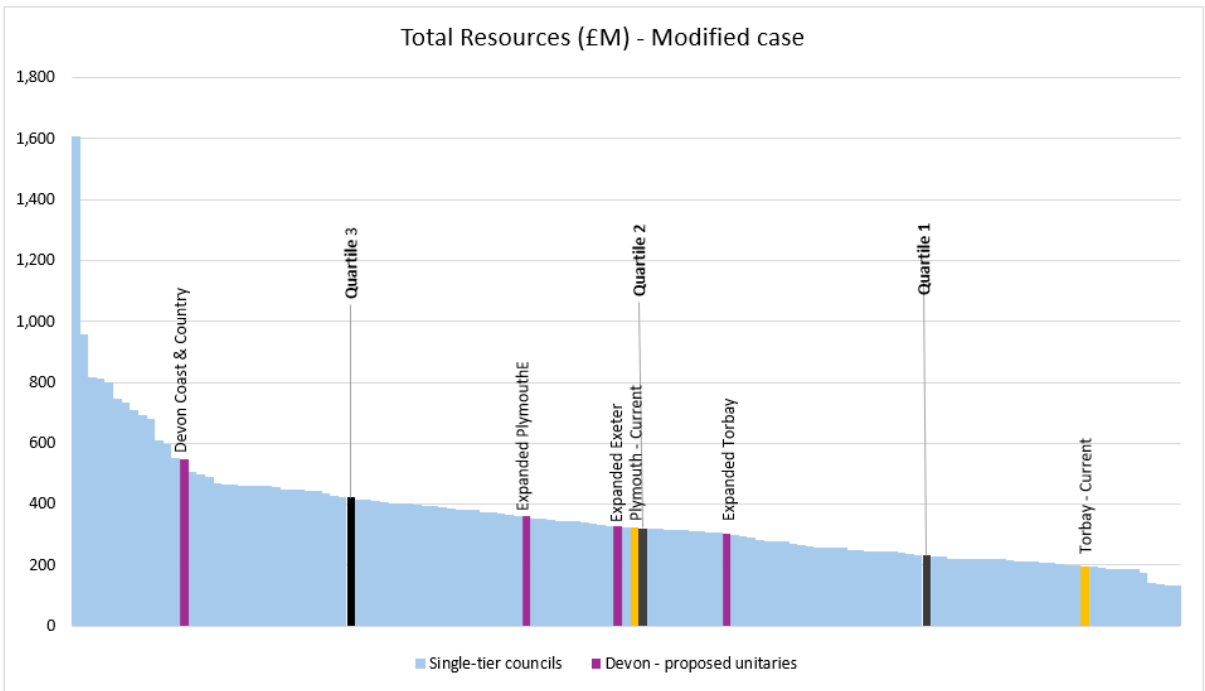


Figure 16.2



**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 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 16.1 below includes the assumed savings detailed in table 16.4 (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 16.1 and 16.2 below summarise the modelled position for the base and modified proposals:

Table 16.1

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

Table 16.2

	Estimated costs & income (£m) - Modified Case			
	Devon Coast & Countryside	Expanded Exeter	Expanded Plymouth	Expanded Torbay
<b>NET COST OF SERVICES:</b>	<b>503.5</b>	<b>316.4</b>	<b>338.4</b>	<b>276.8</b>
<i>funded by:</i>				
Settlement Funding Assessment	143.9	144.0	163.5	116.3
Council tax	367.4	177.0	177.8	163.3
<b>TOTAL CORE SPENDING POWER FUNDING:</b>	<b>511.3</b>	<b>321.0</b>	<b>341.2</b>	<b>279.6</b>
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 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 governments 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 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 16.3

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

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 Housing Revenue Account (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 & 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 16.4 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 16.1 and 16.2 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 16.4: estimated savings (base and modified proposal):

Cost / Saving Category	Estimated cost / (saving) (£m) - Base Proposal	Estimated cost / (saving) (£m) - Modified Proposal
Service disaggregation 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
<b>TOTAL NET MODELLED ANNUAL SAVING</b>	<b>-64.5</b>	<b>-58.4</b>
<i>Possible "Stretch" saving - right sizing social care</i>	-1.8	-11.3
<b>TOTAL POTENTIAL NET ANNUAL SAVING</b>	<b>-66.4</b>	<b>-69.7</b>

- 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 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 16.5: 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.)

Cost category	Estimated cost for Base proposal - £m					Comments / explanation
	Year -1 (2026/27)	Year 0 (2027/28)	Year 1 (2028/29)	Year 2 (2029/30)	TOTAL	
Redundancy / workforce exit	0.0	5.0	12.0	5.0	22.0	Workforce exit costs would be significant in the re-organisation 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.
New council establishment - policy & process	0.3	0.3	0.3	0.0	0.9	Establishing policy and constitutional frameworks for two new councils.

Cost category	Estimated cost for Base proposal - £m					Comments / explanation
	Year -1 (2026/27)	Year 0 (2027/28)	Year 1 (2028/29)	Year 2 (2029/30)	TOTAL	
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 re-configuring office accommodation to release longer term savings.
Programme contingency	0.0	2.0	1.8	0.7	4.5	Contingency for unanticipated costs
<b>TOTAL</b>	<b>4.2</b>	<b>21.8</b>	<b>20.1</b>	<b>7.9</b>	<b>55.0</b>	

Table 16.6: Estimated Devon-wide implementation costs (modified proposal):

Cost category	Estimated cost for Modified proposal - £m					Comments / explanation
	Year -1 (2026/27)	Year 0 (2027/28)	Year 1 (2028/29)	Year 2 (2029/30)	TOTAL	
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 + 1 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
<b>TOTAL</b>	<b>5.8</b>	<b>27.7</b>	<b>27.3</b>	<b>9.3</b>	<b>70.1</b>	

Table 16.7: Estimated implementation costs for extended Plymouth Council modification only:

Cost category	Estimated cost for Modified proposal (Extended Plymouth only) - £m					Comments / explanation
	Year -1 (2026/27)	Year 0 (2027/28)	Year 1 (2028/29)	Year 2 (2029/30)	TOTAL	
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)
<b>TOTAL</b>	<b>0.4</b>	<b>2.2</b>	<b>2.1</b>	<b>0.2</b>	<b>4.9</b>	

### 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 16.8 below:

Table 16.8

	Year -1 (2026/27) (£m)	Year 0 (2027/28) (£m)	Year 1 (2028/29) (£m)	Year 2 (2029/30) (£m)	Year 3 (2030/31) (£m)	Year 4 (2031/32) (£m)	Year 5 (2032/33) (£m)
<b>Base Case proposal</b>							
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 16.3, 16.4 and 16.5 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 16.3 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 16.4 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 16.5 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 16.3: Usable Revenue Reserves as a proportion of Core Spending Power – Devon compared to other re-organising shire areas:

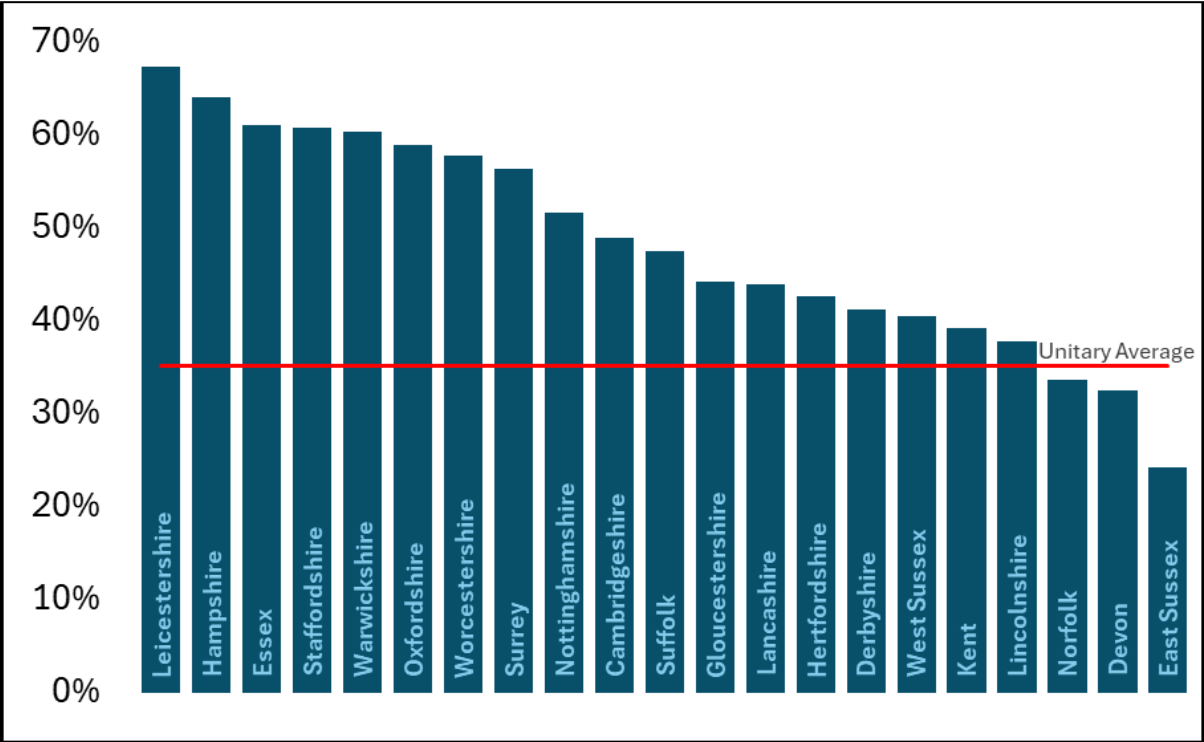


Figure 16.4: Usable Revenue Reserves + cumulative DSG deficit as a proportion of Core Spending Power – Devon compared to other re-organising shire areas:

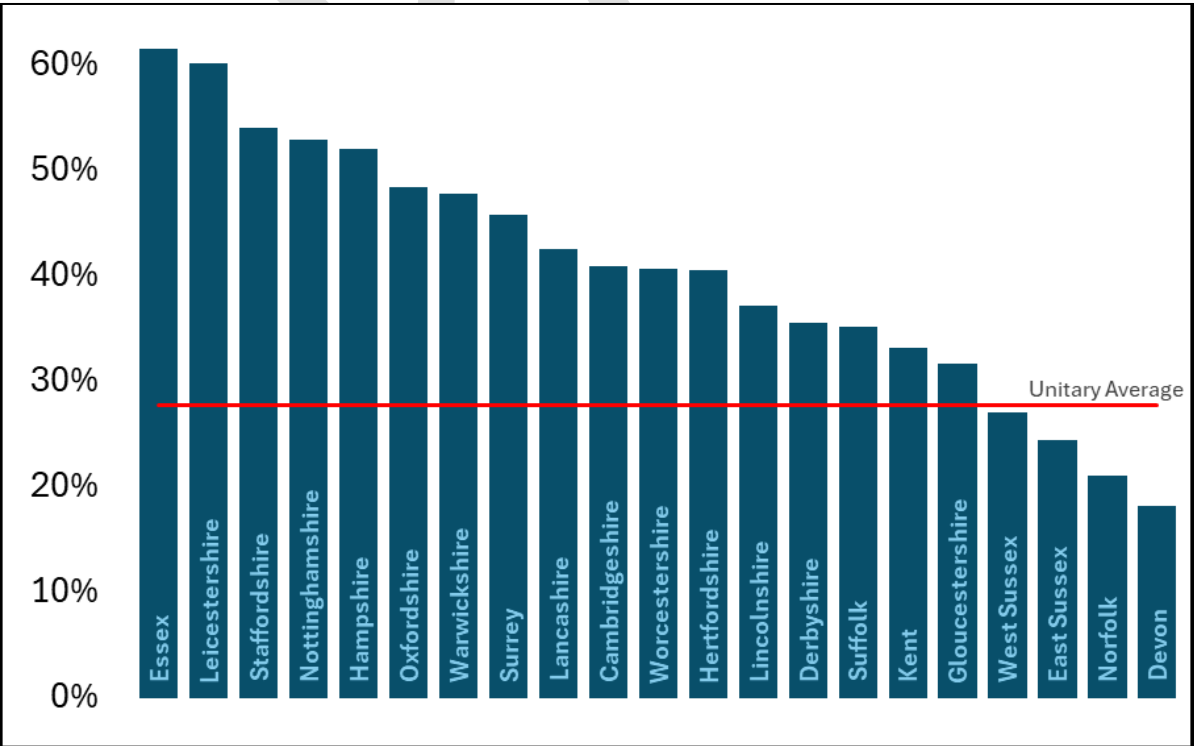
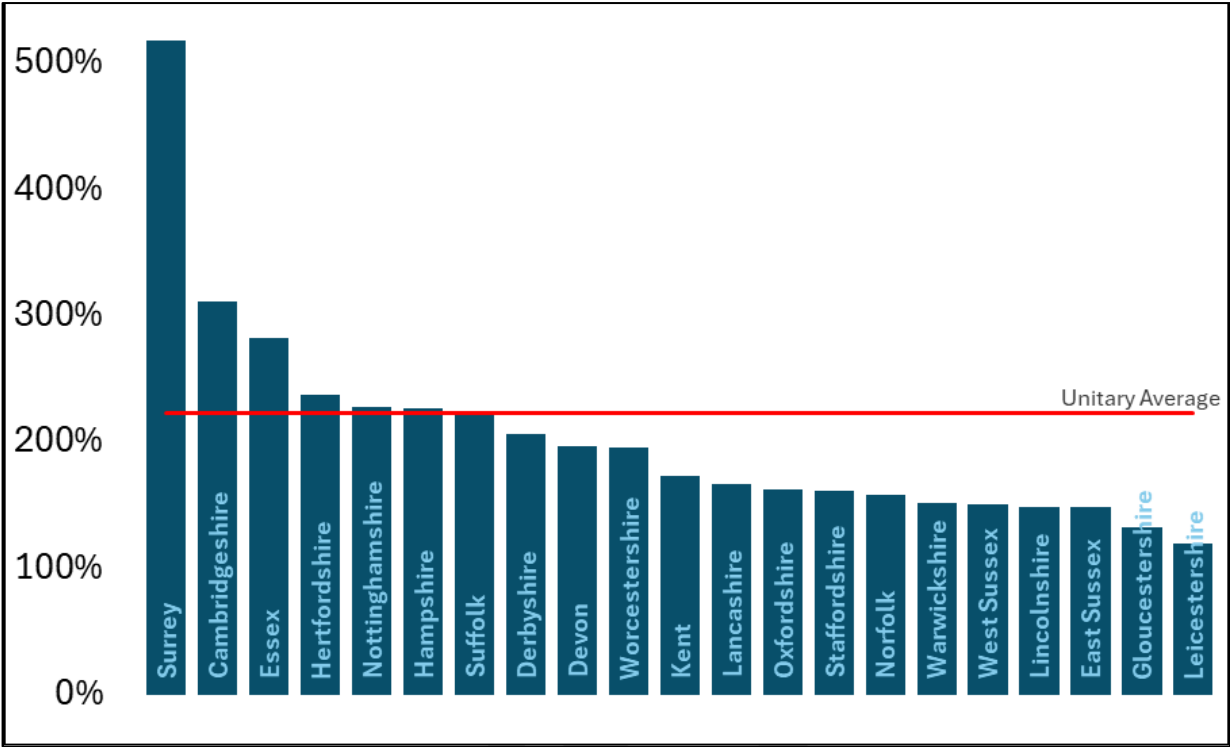


Figure 16.5: Capital Financing Requirement : Core Spending Power ratio – Devon compared to other re-organising shire areas:



- 17.37. The inherited financial resilience position illustrated in figures 16.3-5 above will be a challenge for any new combination of councils in Devon. In particular, figure 16.4 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 16.6 and 16.7 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 16.6: Usable Revenue Reserves as a proportion of Core Spending Power – Base proposal unitaries compared to existing English Unitary councils:

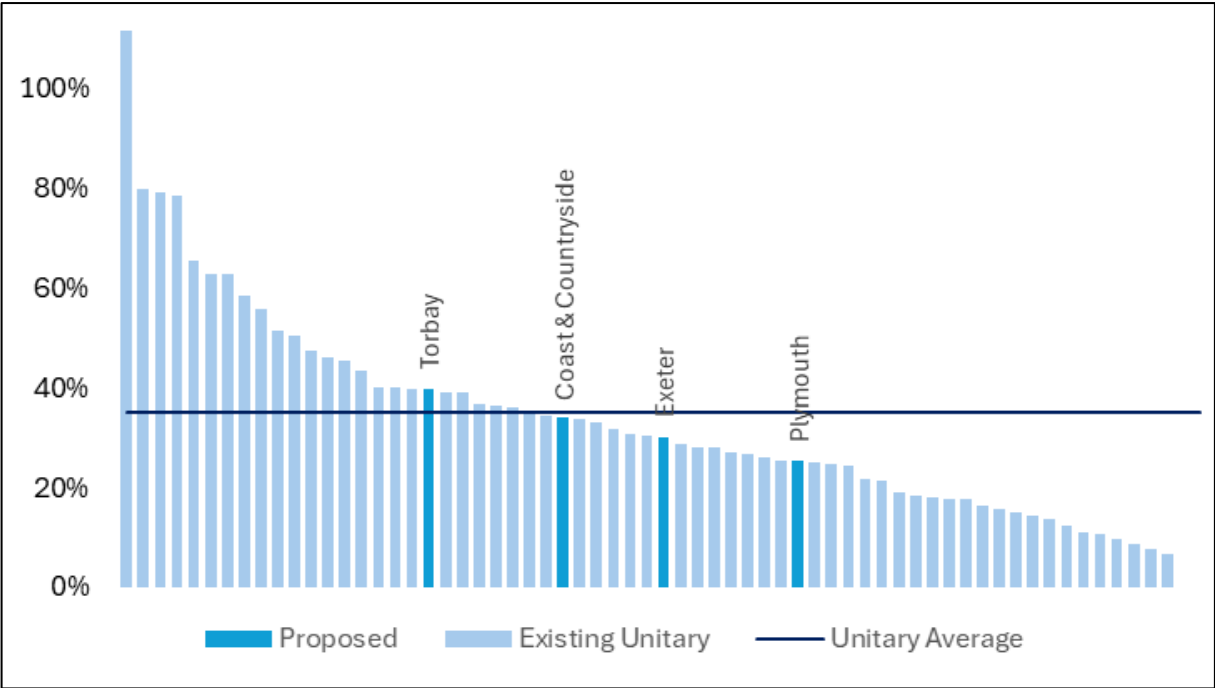
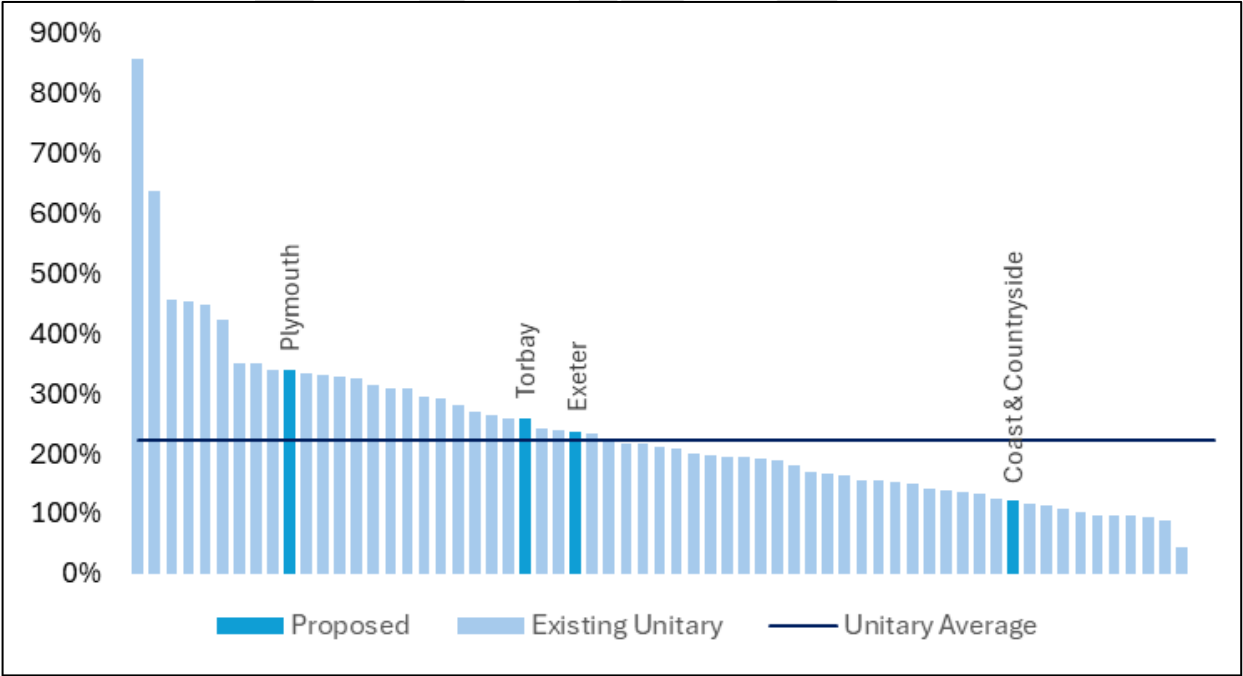


Figure 16.7: Capital Financing Requirement to Core Spending Power ratio – Base proposal unitaries compared to existing English Unitary councils:



Finally, figures 16.8 and 16.9 below explore these ratios for the modified proposal:

Figure 16.8: Usable Revenue Reserves as a proportion of Core Spending Power – Modified proposal unitaries compared to existing English Unitary councils:

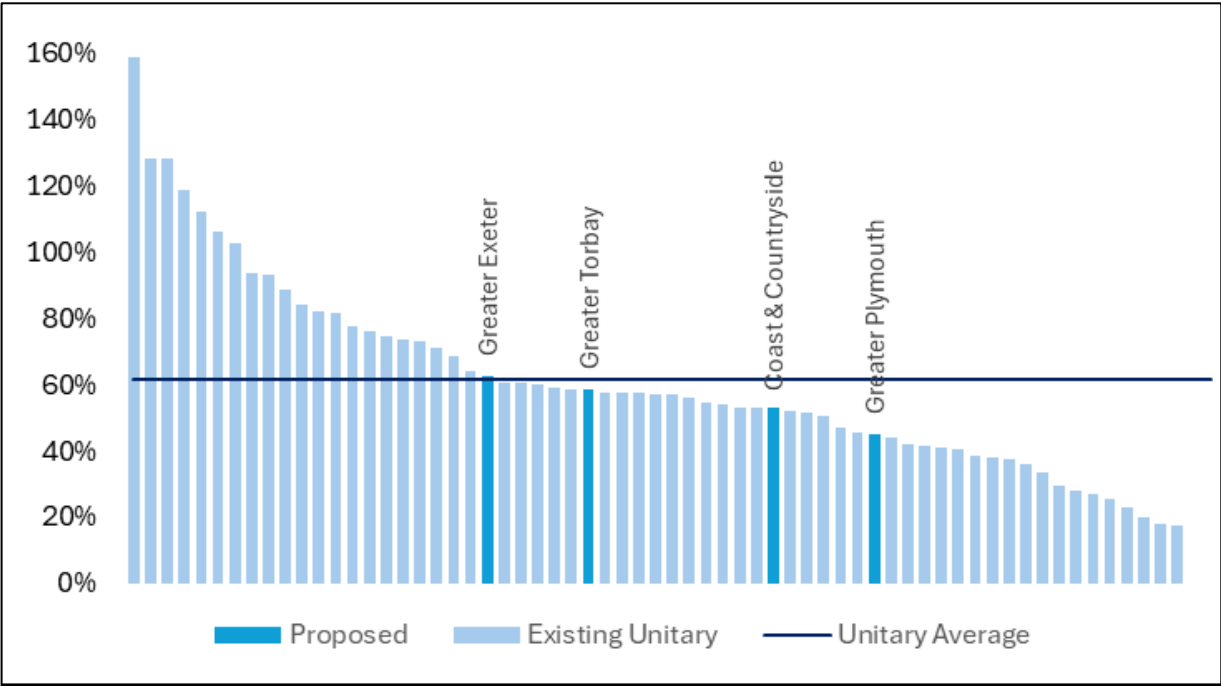


Figure 16.9: Capital Financing Requirement to Core Spending Power ratio – Modified proposal unitaries compared to existing English Unitary councils:



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 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 Mayor 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 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 governments' "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.
- 18.18. Alternative models would undermine effective devolution. A single mega-council would replicate problems of remote governance and the Three unitaries model 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 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 Report is shown in Appendix A7.

### 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:

**Governance and representation:** 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.

**Our response:** 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.

**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.

**Our response:** 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.

**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.

**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.

**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.

**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.

**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.

**Our response:** 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.

**Digital inclusion:** 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 (1 Gbps 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.

## Implementation Plan

### Assumptions

- 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.

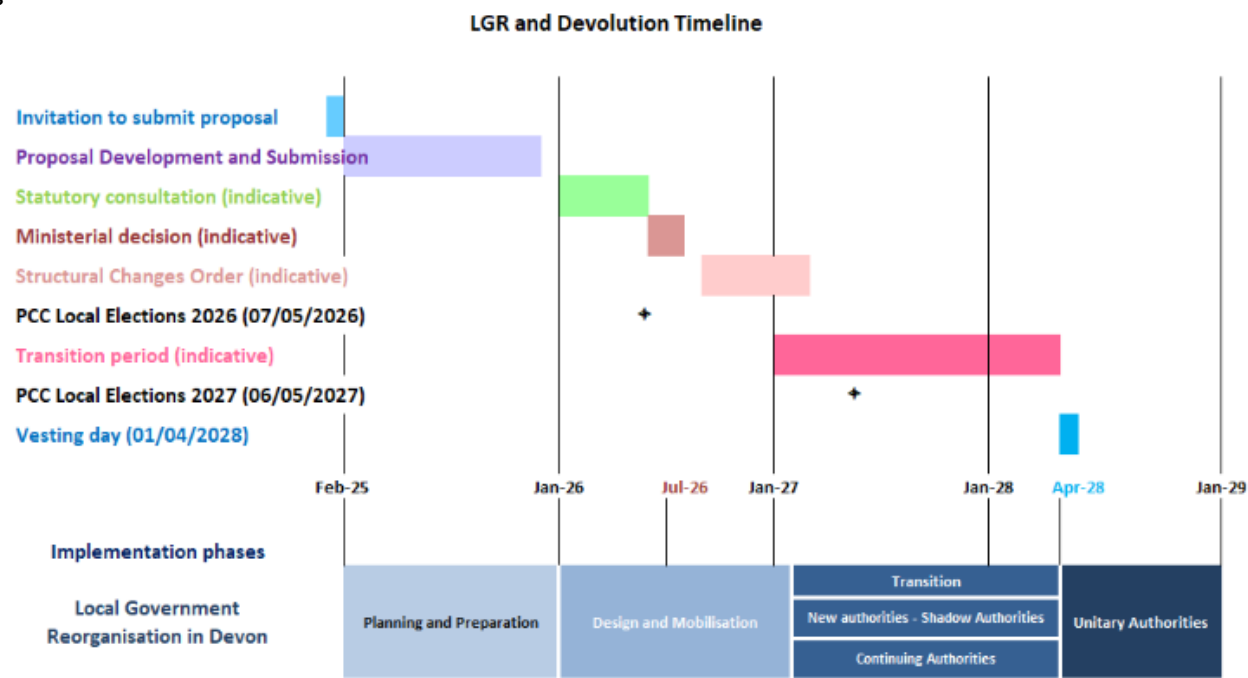
### Rationale for implementation

- 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 programme 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.

### LGR Implementation key dates and delivery phases

- 20.3. The timings provided below, including election dates, reflect those outlined by MHCLG. The letter explicitly refers to new authorities, creating some uncertainty as to whether this would apply to Plymouth. The impact on Plymouth would have to be confirmed once a decision is made by MHCLG on the proposals.

Figure 18.1



Strategic governance and oversight

20.4. 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 18.1

Governance component	Continuing Authorities Plymouth Torbay	New Authorities Exeter 'Devon Coast and Countryside'
Legal status	The existing local authority retains existing legal identity and absorbs new areas. The Structural Changes Order can: <ul style="list-style-type: none"><li>legally expand boundaries,</li><li>designate the authority as the continuing authority</li><li>transfer assets, liabilities, and staff,</li><li>set out transitional governance arrangements (e.g. implementation executive)</li></ul>	A new legal entity is created via Structural Changes Order (SCO), to: <ul style="list-style-type: none"><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.
<b>Decision-making powers</b>	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.
<b>Electoral arrangements</b>	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.
<b>Staffing and TUPE</b>	TUPE applies to incoming staff; HR harmonisation led by existing HR function.	TUPE applies across all predecessor councils; new HR structures are established.
<b>Service harmonisation</b>	CSC/Education ASC Highways Waste Planning Housing Leisure	CSC/Education ASC Highways Waste Planning Housing Leisure
<b>Assets</b>	Full asset transfer	Full asset transfer
<b>Contracts</b>	Contract novation required	Contract novation required
<b>Branding and identity</b>	Existing branding to be retained and extended.	New branding and identity developed for the new authority.
<b>Monitoring and Evaluation</b>	M&E is embedded within existing performance frameworks.	A new M&E framework developed from scratch, aligned with the SCO and MHCLG expectations.
<b>Risk management</b>	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

20.5. 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.

20.6. 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.

20.7. 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

20.8. 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)

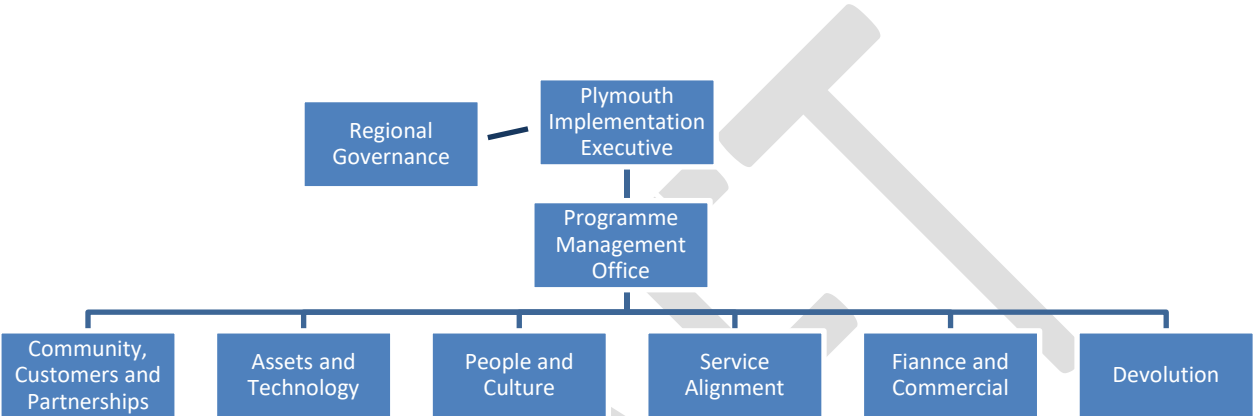
Table 18.2

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 18.2



## 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 19.1

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.



DRAFT

# EQUALITY IMPACT ASSESSMENT – LOCAL GOVERNMENT REORGANISATION FINAL PROPOSAL

## SECTION ONE: INFORMATION ABOUT THE PROPOSAL

<b>Author(s):</b> The person completing the EIA template.	Emmanuelle Marshall	<b>Department and service:</b>	LGR Project Team	<b>Date of assessment:</b>	06/10/2025
<b>Lead Officer:</b> Head of Service, Service Director, or Strategic Director.	Ross Jago	<b>Signature:</b>		<b>Approval date:</b>	04/11/2025
<b>Overview:</b>	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 1 <sup>st</sup> 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.				
<b>Decision required:</b>	To note the content of this Equality Impact Assessment of Plymouth City Council's Draft Local Government Reorganisation Proposal for Devon.				

## SECTION TWO: EQUALITY IMPACT ASSESSMENT SCREENING TOOL

<b>Potential external impacts:</b>	<b>Yes</b>	<b>No</b>
<ul style="list-style-type: none"> <li>Does the proposal have the potential to negatively impact service users, communities or residents with protected characteristics?</li> </ul>	✓	

<b>Potential internal impacts:</b> Does the proposal have the potential to negatively impact Plymouth City Council employees?	<b>Yes</b>	✓	<b>No</b>	
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).	<b>Yes</b>	✓	<b>No</b>	
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

Protected characteristics (Equality Act, 2010)	Evidence and information (e.g. data and consultation feedback)	Adverse impact	Mitigation activities	Timescale and responsible department
--	--	----------------	-----------------------	--------------------------------------

<b>Age</b>	<p>Plymouth</p> <ul style="list-style-type: none"> <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> </ul> <p>Southwest</p> <ul style="list-style-type: none"> <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> </ul> <p>England</p> <ul style="list-style-type: none"> <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> </ul> <p>(2021 Census)</p> <p><b>Engagement from people with the protected characteristic of age</b></p> <p>Older adults between the ages of 55 and 74 accounted for 313 respondents, or nearly 50% of all age-disclosing participants.</p> <p>9 respondents in South Hams and 5 respondents in Plymouth were between the ages of 16 and 24</p> <p>Additionally, a youth-specific event was held in Plymouth.</p>	<p>No adverse impacts are anticipated at this early stage.</p> <p>This is what we have learned so far in our consultation.</p> <p>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.</p> <p>Older residents in rural areas may be concerned about reduced access to healthcare and transport during the process of reorganisation.</p> <p>Concerns were expressed during engagement about health inequalities and inequality of service between urban and rural communities.</p>	<p>Continuity in service delivery for children and adults is a priority.</p> <p>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.</p>	Not known yet.
<b>Care experienced individuals</b>	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
<p>(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).</p>	<p>per cent of care leavers open to the service (6 per cent aged 18-20 and 12 per cent of those aged 21+) who are in unsuitable accommodation.</p> <p>The Care Review reported that 41 per cent of 19–21-year-old care leavers are not in education, employment or training (NEET) compared to 12 per cent of all other young people in the same age group.</p> <p>In Plymouth there are currently 50 per cent of care leavers aged 18-21 Not in Education Training or Employment (54 per cent of all those care leavers aged 18-24 who are open to the service).</p> <p>There are currently 195 care leavers aged 18 to 20 (statutory service) and 58 aged 21 to 24 (extended offer). There are more care leavers aged 21 to 24 who could return for support from services if they wished to.</p> <p>A total of 50 care-experienced individuals participated in the engagement process, representing approximately 6.1% of all survey respondents across Plymouth and the South Hams. This includes 35 respondents from the South Hams and 15 from Plymouth</p>	<p>Broader themes relevant to this group were raised in the engagement, including concerns about access to children's services, continuity of care, stability, and the importance of youth-led spaces and mental health support. These issues were particularly evident in the youth engagement sessions and in feedback relating to service integration and safeguarding.</p>	<p>The needs of care-experienced young people are recognised in the proposal.</p> <p>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.</p>	

Protected characteristics (Equality Act, 2010)	Evidence and information (e.g. data and consultation feedback)	Adverse impact	Mitigation activities	Timescale and responsible department
<b>Disability</b>	<p>9.4 per cent of residents in Plymouth have their activities limited 'a lot' because of a physical or mental health problem.</p> <p>12.2 per cent of residents in Plymouth have their activities limited 'a little' because of a physical or mental health problem (2021 Census)</p> <p>150 respondents to the Plymouth and South Ham's surveys identified as having a disability or long-term health condition that limits daily activities.</p> <p>This represents approximately 18.3% of all survey participants (150 out of 824).</p>	<p>No adverse impacts are anticipated at this early stage.</p> <p>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.</p> <p>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.</p>	<p>The proposal aims to improve strategic coordination of SEND services.</p> <p>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.</p>	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
<ul style="list-style-type: none"> <li><b>Gender reassignment</b></li> </ul>	<p>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).</p> <p>Approximately 0.6% of all survey participants indicated that their gender identity is different from the sex assigned at birth.</p>	<p>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.</p>	<p>The Council recognises the importance of inclusive service design and equitable representation. Should the proposal proceed to implementation, the Council will ensure that the specific needs of this group are considered through further assessments, in line with its statutory duties and commitment to inclusive service delivery.</p>	<p>Not known yet.</p>



Protected characteristics (Equality Act, 2010)	Evidence and information (e.g. data and consultation feedback)	Adverse impact	Mitigation activities	Timescale and responsible department
<b>Marriage and civil partnership</b>	<p>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.</p> <p>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).</p>	<p>No adverse impacts are anticipated at this early stage.</p> <p>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.</p>	<p>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.</p>	Not known yet.
<b>Pregnancy and maternity</b>	<p>The total fertility rate (TFR) for England was 1.62 children per woman in 2021. The total fertility rate (TFR) for Plymouth in 2021 was 1.5.</p>	<p>No adverse impacts are anticipated at this early stage.</p> <p>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.</p>	<p>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.</p>	Not known yet.

<ul style="list-style-type: none"> <li><b>Race</b></li> </ul>	<ul style="list-style-type: none"> <li>In 2021, 94.9 per cent of Plymouth's population identified their ethnicity as White, 2.3 per cent as Asian and 1.1 per cent as Black (2021 Census) People with a mixed ethnic background comprised 1.8 per cent of the population. 1 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).</li> <li>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.</li> <li>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</li> </ul>	<p>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.</p>	<p>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.</p>	<p>Not known yet.</p>
---	--	---	---	-----------------------

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.			
<ul style="list-style-type: none"> <li><b>Religion or belief</b></li> </ul>	<p>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).</p> <p>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).</p>	<p>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.</p>	<p>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.</p>	<p>Not known yet.</p>

Protected characteristics (Equality Act, 2010)	Evidence and information (e.g. data and consultation feedback)	Adverse impact	Mitigation activities	Timescale and responsible department
<ul style="list-style-type: none"> <li><b>Sex</b></li> </ul>	<p>51 per cent of our population are women and 49 per cent are men (2021 Census).</p>	<p>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.</p>	<p>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.</p>	<p>Not known yet.</p>
<ul style="list-style-type: none"> <li><b>Sexual orientation</b></li> </ul>	<p>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).</p>	<p>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.</p>	<p>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.</p>	<p>Not known yet.</p>

**SECTION FOUR: HUMAN RIGHTS IMPLICATIONS**

<b>Human Rights</b>	<b>Implications</b>	<b>Mitigation Actions</b>	<b>Timescale and responsible department</b>
	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**

<b>Equality objectives</b>	<b>Implications</b>	<b>Mitigation Actions</b>	<b>Timescale and responsible department</b>
<b>Work together in partnership to:</b> <ul style="list-style-type: none"> <li><b>promote equality, diversity and inclusion</b></li> <li><b>facilitate community cohesion</b></li> <li><b>support people with different backgrounds and lived experiences to get on well together</b></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	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.

	experience, particularly among young people and rural communities.		
<b>Give specific consideration to care experienced people to improve their life outcomes, including access to training, employment and housing.</b>	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.
<b>Build and develop a diverse workforce that represents the community and citizens it serves.</b>	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.
<b>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.</b>	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.

		proposal seeks to secure, this objective would continue to be pursued.	
--	--	--	--

# Local Government Reorganisation

## Project details

### Assessment author

Joseph Harmer on behalf of the LGR team.

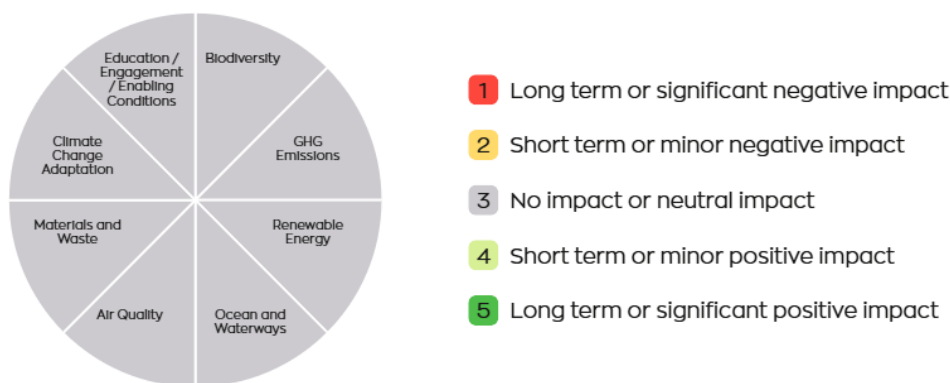
### Project summary

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.

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.