

CABINET 24 NOVEMBER 2025

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



1.0 INTRODUCTION

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

1.2 On 09 January 2025, in response to a report on the English Devolution White Paper, the City Council resolved (Minute 51 refers) the following:

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

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

1.3 On 05 February 2025 the then Minister of State for Local Government and English Devolution, Jim McMahon OBE MP, wrote to all the leaders of two-tier and unitary councils stating that the Government had a clear vision for simpler, more sustainable local government structures, alongside plans for the transfer of power out of Westminster through devolution. This letter also set out a formal legal invitation under powers set out in the Local Government and Public Involvement in Health Act 2007 to submit proposals for a single tier of local government and in an attached schedule identified the Secretary of State's guidance and criteria for unitary government. The letter proposed a timetable for the submission of an interim plan by 21 March 2025 and final proposals by 28 November 2025. The Government made clear that all two-tier areas will have to comply with the requirements of the White Paper. It stated that it would prefer agreement from authorities in developing a single proposal, but if agreement cannot be reached, the Government will accept competing proposals and will decide on the best way forward to ensure its overall aims for better and more efficient service delivery are achieved.

1.4 On 17 March 2025 the City Council unanimously endorsed (with one abstention) the Plymouth Local Government Reorganisation Interim Plan setting out a proposal to extend the boundary of Plymouth City Council to encompass the surrounding 13 parishes currently within South Hams District Council (Minute 77 refers).

1.5 On 19 March 2025, Cabinet approved and agreed to the Plymouth Local Government Reorganisation Interim Plan being submitted to Government setting out the proposed boundary change

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

1.6 On 15 May 2025 the Government wrote to all councils in Devon to provide feedback on their Interim Plans. In welcoming the initial thinking on the various options set out in these Interim Plans the Government made clear that:

1. Effective cooperation between all councils across the invitation area was crucial.
2. Any boundary change needed to be justified.
3. Each council could only submit a single proposal by the deadline of 28 November 2025, this single proposal needing to relate to the whole area; the entirety of Devon.
4. There should be further details and evidence submitted on costs, efficiencies, and outcomes.
5. In relation to the population size of 500,000 set out in the Statutory Invitation guidance and in the English Devolution White Paper this was described as a guiding principle, not a hard target and the rationale for the proposed approach should be set out clearly.
6. Where disaggregation is proposed (particularly in relation to social care, children's services, SEND, homelessness and public safety) further details should be submitted on impacts and risks.
7. Implications for the Devon and Torbay Combined County Authority should be set out.

1.7 On 21 August 2025 the Government also confirmed that:

- The building blocks for any proposal that is submitted are whole district areas but in parallel as part of the submission, a request for a Ministerial modification can be made to amend boundaries in a particular way, to achieve an even better outcome, provided there is a strong justification for this.
- Representations on the status of Plymouth City Council as a “continuing authority” can be included in the submission alongside any proposal, or in response to any subsequent consultation.
- They are not actively seeking amendments to the English Devolution and Community Empowerment Bill currently before Parliament.

1.8 On 12 November 2025, the Scrutiny Management Board considered a draft of the City Council's proposal for local government reorganisation in Devon. The comments of the Scrutiny Management Board and the proposed response have been incorporated into this report.

2.0 LOCAL GOVERNMENT REORGANISATION

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

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

2.2 At the strategic authority level, the Government have highlighted 7 principles related to scale, there being “no devolution islands”, effective delivery of key functions, the need for sensible economic geographies, contiguous boundaries with new constituent unitary authorities, promotion of alignment with other public body boundaries, and local identity. In relation to local government reorganisation the Government’s expectations are:

- All two-tier areas and smaller or failing unitary councils are to develop proposals for reorganisation.
- All councils in an area should collaborate on developing unitary proposals in the best interests of a whole area, rather than producing competing proposals.
- New councils should be the right size to achieve efficiencies, improve capacity, and withstand financial shocks. For most areas, the Government believes this will mean creating councils with a population of 500,000 or more. There may be exceptions to ensure new structures make sense for an area, agreed on a case-by-case basis.
- They will prioritise the delivery of high quality and sustainable public services to citizens and communities above all other issues.
- These reforms will be sequenced alongside devolution ambitions for each area.
- New councils will be expected to take a proactive and innovative approach to neighbourhood involvement and community governance so that citizens are empowered.
- Councils should work with Government to bring about changes as swiftly as possible.
- They will consider which governance models available for local authorities’ best support future decision-making.

2.3 New unitary councils are to be delivered in April 2027 and 2028, with shadow elections taking place earlier. The White Paper sets out that local government re-organisation should not delay devolution, and devolution plans should be complementary.

2.4 The White Paper therefore creates an opportunity to look at the geographical footprint of existing council areas, to ensure that local councils fit effectively within the new strategic tier of local government. It, as well as the subsequent letter from Government on 05 February 2025, sets out 6 criteria by which final proposals will be assessed and considered by the Secretary of State:

1. A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government.
2. Unitary local government must be the right size to achieve efficiencies, improve capacity, and withstand financial shocks.
3. Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens.
4. Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views.
5. New unitary structures must support devolution arrangements.
6. New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.

2.5 In developing its own approach to local government reorganisation, the City Council and Cabinet in March 2025 supported, endorsed, and agreed to the following principles:

1. Any boundary change will be appropriate for a new Plymouth unitary authority to be financially viable and of a population size that can deliver sustainable high-quality services to residents.
2. Any boundary change will retain the character and identity of the existing neighbourhoods in Plymouth and the parishes of any extended area.
3. Any boundary change will respect existing unitary county boundaries.
4. Any boundary change will minimise organisational impacts on the Dartmoor National Park Authority.
5. Any boundary change will be based on existing parish boundaries.
6. Any boundary change will have regard to the requirements for future sustainable growth and reflect the opportunities that arise from Plymouth's unique strategic role in the south west.

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

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

- Option 1: An extended city boundary based on a Plymouth Growth Area.
- Option 2: An extended city boundary based on the Local Care Partnership Western NHS Locality.
- Option 3: An extended city boundary based on the Plymouth Housing Market Area.
- Option 4: Do nothing.

2.7 Both the City Council and Cabinet, in March 2025, supported and agreed to Option 1 – a boundary extension based on what was then termed the “Plymouth Growth Area” (now called “expanded Plymouth”). This part of the proposal for local government reorganisation for Devon, following the “Big Community Conversation,” has not been changed.

2.8 Plymouth City Council’s proposal for the whole of the Devon area is summarised in Section 4 and set out in full in Appendix A.

3.0 THE “BIG COMMUNITY CONVERSATION”

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

3.2 To ensure that as many people were reached as possible, the “Big Community Consultation”:

- Held 19 facilitated conversation events across Plymouth and South Hams, attended by 489 people.
- Circulated two tailored surveys which received 824 responses.
- The project website attracted over 11,000 unique visitors and 816 subscribers.
- Launched a social media campaign which generated over 2.1 million impressions and reached more than 100,000 individuals.
- Distributed posters, flyers and newsletters to community venues, schools, GP surgeries and libraries across both Plymouth and South Hams.
- Held 17 stakeholder meetings and 1:1 briefings with MPs, universities, emergency services, housing, and business groups.

3.3 The engagement process was designed to ensure that Plymouth City Council’s proposals for LGR were shaped by the views of residents, stakeholders, and community groups across Plymouth

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

3.4 The full Plymouth Local Government Reorganisation “Big Community Conversation” Report is attached as an appendix to the proposal document.

3.5 The main issues raised during the engagement, and how the City Council has responded to them, are shown below:

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.

Cabinet 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 the City Council will work flexibly to support locally appropriate neighbourhood governance solutions whilst maintaining consistent standards and values across the enlarged area.

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

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

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

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

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

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

Cabinet 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.

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

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

Cabinet 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. The City Council is also committed to holding bespoke sessions with young people on the new Local Plan for the “expanded Plymouth” area.

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.

Cabinet 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 (1Gbps broadband and 4 and 5G mobile services) and helping residents with the skills and providing access to equipment that will allow them to get online. Recent survey results show that only 3% of Plymouth residents never use the internet and a further 2% are insufficiently confident in their use of the internet. We are using these results including both age and geography splits of this data to help us target interventions to help overcome this level of digital exclusion.

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

Base Proposal

4.1 It is a requirement under the 2007 Act to base a proposal on whole district building blocks. The base case proposal sets out the City Council's response to the Secretary of State's invitation issued on 05 February 2025 (and taking account of the feedback on the Plymouth's Interim Plan set out in the letter of 15 May 2025).

4.2 Plymouth City Council's base case for local government reorganisation for Devon is to submit a combined proposal (under the provisions of Section 2(1)(d) of the 2007 Act) as follows:

- Plymouth City Council as a continuing unitary authority with a population of around 270,000 based on its existing unitary council boundary.
- Exeter City Council as a unitary authority with a population of around 135,000 based on its existing administrative boundary.
- Torbay Council as a continuing unitary authority with a population of around 139,000 based on its existing unitary council boundary.
- Devon County Council as a unitary authority with a population of around 690,000 based on its existing county boundary excluding the district of Exeter.

4.3 The base case has been assessed against the six criteria set out in the White Paper and also in the Ministerial letter dated 05 February 2025. It is the City Council's assessment that this base case meets some but not all the six criteria. Were this to be approved by the Secretary of State, then Plymouth City Council would remain on its existing administrative boundary and the wider benefits of local government reorganisation, subsequent devolution, and the delivery of significant growth potential arising from the Defence Deal, the designation of Plymouth as the National Centre for Marine Autonomy and its shortlisting as one of the Government's planned new towns would be severely compromised.

4.4 This base proposal is prepared in accordance with Part I of the 2007 Act, but it is not the final proposal that the City Council wishes to see implemented: that is the proposal which would require a Ministerial modification to create four unitary councils across Devon.

Options Appraisal

4.5 Since the submission of the Interim Plan in March 2025, further analysis has been undertaken on the options for local government reorganisation in Devon. All of these options have been assessed against the six criteria in the White Paper.

4.6 The further options considered have been:

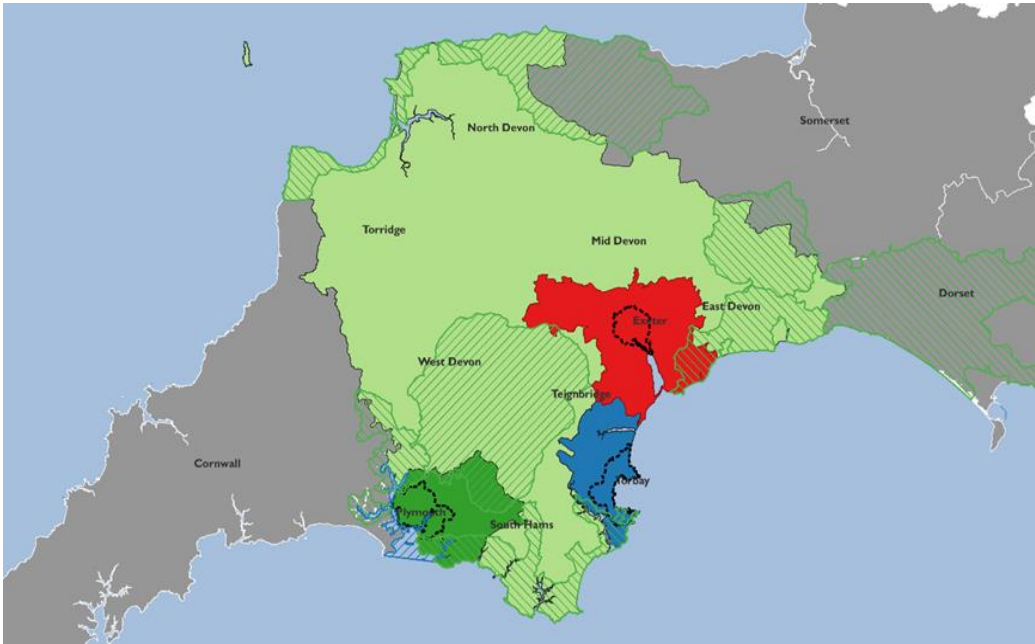
- **A four unitary option** – comprising unitary councils for Plymouth, Torbay and Exeter on extended boundaries and a unitary Devon council on a revised geographical footprint.
- **A “1-4-5” unitary option** – comprising three unitary councils with Plymouth on its existing boundary, the combination of the existing districts of West Devon, South Hams, Teignbridge, and Torbay (“District 4”), and the combination of the existing districts of East Devon, Exeter, Mid Devon, North Devon, and Torridge (“District 5”).

Ministerial Modification

4.7 Under the provisions of Sections 7 and 11 of the 2007 Act the City Council can request a Ministerial modification to its base case proposal because this will deliver longer-term benefits in proactively working with the South West Peninsula Mayoral Strategic Authority to drive growth. The proposal, which reflects the City Council’s vision for local government, which would require a Ministerial modification is for there to be 4 unitary councils covering the Devon area as follows:

- **“expanded Plymouth” Unitary Council** – comprising the unitary council of Plymouth City Council as a continuing authority with a population of 270,000 with a Ministerial modification to include 13 parishes all within the current district of South Hams District Council of Bickleigh, Shaugh Prior, Sparkwell, Brixton, Wembury, Cornwood, Harford, Ugborough, Ivybridge, Ermington, Yealmpton, Holberton and Newton and Noss resulting in a population of approximately 300,000.
- **“expanded Exeter” Unitary Council** – comprising a new unitary council based on the current Exeter City Council boundary with population of 135,000 with a Ministerial modification to extend this with 15 parishes from within Teignbridge District Council, 28 parishes from within East Devon District Council and six parishes from within Mid-Devon District Council resulting in a population of approximately 260,000.
- **“expanded Torbay” Unitary Council** – comprising the unitary council of Torbay as a continuing authority on its existing boundaries with a population of 139,000 with a modification comprising of 23 parishes from within Teignbridge District Council and South Hams District Council resulting in a population of approximately 220,000.
- **A Devon “Coast and Countryside” Unitary Council** – comprising a new unitary council covering the rest of the former Devon County Council area resulting in a population of approximately 450,000.

4.8 The preferred proposal for four unitary councils to replace the existing county council and 8 district councils is shown on the map below:



5.0 SCRUTINY MANAGEMENT BOARD (12 NOVEMBER 2025)

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

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

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

6.0 NEXT STEPS

6.1 Following the submission of Plymouth City Council's base proposal and request for a Ministerial modification in support for its preferred proposal, the Secretary of State needs to decide which of the proposals likely to be submitted by councils across Devon actually meet their six criteria. Once this assessment has been undertaken, the Government will undertake a statutory consultation on the option or options for local government reorganisation, he wishes to seek views from local people, business, and other stakeholders on. It is understood this will be in early 2026. Following a period of consultation, expected to be in the order of 7 weeks (as it was in relation to the recent consultation for local government reorganisation in Surrey), the Secretary of State will consider all the representations made and make a final decision on the unitary structure of local government for Devon.

6.2 If the Secretary of State decides to proceed, then a Structural Change Order will be prepared and laid before Parliament. This will remove the existing two-tier arrangement in Devon and dis-establish the existing county council and district councils. This same Structural Change Order will also establish the new unitary councils.

6.3 There will be a transition period where all the necessary financial, legal, and organisational arrangements will need to be put in place, overseen by an Implementation Executive leading up to Vesting Day on 01 April 2028.

7.0 CONCLUSIONS AND RECOMMENDATIONS

7.1 Plymouth is an ambitious city and welcomes the opportunities which arise from both the Government's devolution and local government reorganisation approach. Plymouth can and should play a unique role as an expanded city driving growth and delivering better public services. As a city and as a council, Plymouth has a track record of innovation, collaboration and focus on delivery through a wide variety of programme and projects it has delivered over the years. In order to fulfil its long-term potential and to enable the Government to meet its growth objectives, it now needs to operate on a more sub-regional footprint.

7.2 Plymouth City Council's plan for local government reorganisation for the Devon area is transformative, innovative, growth-orientated, and evidence-led. By moving from an outdated and inefficient two-tier system of local government to a modernised system based on for unitary councils this can deliver a sustainable and more resilient future for the people of Plymouth, Exeter, Torbay, and Devon.

7.3 Plymouth City Council's proposals for local government for Devon comply with the Government's criteria to be based on whole district boundaries but we are clear that this is not the

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

7.4 It is therefore recommended that Cabinet:

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