

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

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Plymouth City Council Devolution  
and Local Government Reform Team

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# Appendix I - Finance

## I. Overview of approach

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

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

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

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

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

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

## **2. Transformation and Reorganisation benefits and Disaggregation costs**

### **2.1 Baseline costs**

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

All baseline costs analysed in Annex 1 are generally presented and analysed using the net cost of service calculation prescribed by the RA guidance, aggregating the total cost of services at a level of cost which:

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Estimates of changes to fixed costs before and after reorganisation are set out in Tables 1 and 2 (below and overleaf), for the base case and modified proposals respectively.

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

	Total estimated current fixed costs	Estimated fixed costs after reorganisation (£m) – base case proposal				Total estimated future fixed costs	Difference – cost / (saving)
		Devon coast & countryside	Exeter	Plymouth	Torbay		
Top tier functions	42.7	21.6	9.5	11.8	9.5	52.5	9.8
Lower tier functions	62.3	11.7	6.9	8.5	6.9	34.0	-28.3
Corporate functions	140.1	38.1	21.6	29.1	21.6	110.2	-29.9
<b>TOTAL</b>	<b>245.1</b>	<b>71.4</b>	<b>38.0</b>	<b>49.3</b>	<b>38.0</b>	<b>196.7</b>	<b>-48.4</b>

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

	Total estimated current fixed costs	Estimated fixed costs after reorganisation (£m) – modified case proposal				Total estimated future fixed costs	Difference – cost / (saving)
		Devon coast & countryside	expanded Exeter	expanded Plymouth	expanded Torbay		
Top tier functions	42.7	16.7	13.8	11.9	13.8	56.2	13.5
Lower tier functions	62.3	9.5	8.9	8.5	8.9	35.7	-26.5
Corporate functions	140.1	32.0	29.2	29.1	29.2	119.3	-20.8
<b>TOTAL</b>	<b>245.1</b>	<b>58.2</b>	<b>51.8</b>	<b>49.4</b>	<b>51.8</b>	<b>211.2</b>	<b>-33.9</b>

### 2.3 Property optimisation, democratic costs and optimising leadership

We have estimated savings achievable through the rationalisation of property and the optimisation of democratic and leadership costs separately to the broader estimation of savings and additional costs arising from the wider. The baseline expenditure for the relevant categories of cost has been disaggregated from other corporate / central services costs (as set out in Annex 1) to ensure there is no double-counting within wider aggregation savings. For all costs in this section, under the base case costs are assumed to be unchanged for the base proposal for Plymouth and Torbay unitaries.

#### **Property optimisation**

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

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

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

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



### ***Optimisation of democratic costs***

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

The number of councillors would also reduce with a reduction in the number of councils – there are currently 475 district, county and unitary councillors across the 11 authorities in Devon. Councillors are paid allowances and expenses, which would reduce in proportion with a reduction to the number of councillors.

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

### ***Optimisation of leadership costs***

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

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

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

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

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

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

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

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

	Total current costs (£m)	Estimated costs after reorganisation (£m) – modified proposal				Total estimate d future costs (£m)	Estimate d saving (£m)
		Devon Coast & Countryside	expanded Exeter	expanded Plymouth	expanded Torbay		
Office accommodation	8.4	2.1	1.6	1.6	1.7	6.9	-1.5
Elections	4.0	0.6	0.6	0.6	0.3	2.2	-1.8
Member allowances	5.9	1.5	0.8	1.3	0.8	4.4	-1.5
Senior Leadership	13.0	2.5	2.5	2.2	2.5	9.7	-3.3
<b>TOTAL</b>	<b>31.3</b>	<b>6.8</b>	<b>5.5</b>	<b>5.7</b>	<b>5.3</b>	<b>23.3</b>	<b>-8.0</b>

## 2.4 Other savings

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

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

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

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

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

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

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

## 2.5 Summary of transformation and reorganisation benefits and disaggregation costs

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

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

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

### 3. Financial sustainability and viability

#### Estimated costs and income for proposed authorities

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

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

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

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

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

	Estimated costs & 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
	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

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

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

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



## Annex I - Baseline Costs (£m)

	East Devon	Exeter	Mid Devon	North Devon	South Hams	Teignbridge	Torridge	West Devon	Devon CC	Plymouth	Torbay	TOTAL COST
Education (DSG funded)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	425.1	108.8	66.5	600.3
Other Education	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	82.7	20.3	13.3	116.2
Transport Strategy	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.4	1.4	0.1	3.0
Highways	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	35.0	7.1	7.5	49.6
Traffic Management	0.0	0.0	0.0	-0.1	0.0	0.0	0.0	0.0	0.4	0.5	0.1	0.9
<i>Parking costs</i>	<i>1.9</i>	<i>3.5</i>	<i>0.7</i>	<i>1.3</i>	<i>2.4</i>	<i>2.1</i>	<i>1.1</i>	<i>0.8</i>	<i>5.5</i>	<i>6.4</i>	<i>2.5</i>	<i>28.1</i>
<i>Parking income</i>	<i>-5.6</i>	<i>-10.6</i>	<i>-1.5</i>	<i>-4.0</i>	<i>-4.8</i>	<i>-5.8</i>	<i>-2.4</i>	<i>-1.1</i>	<i>-9.8</i>	<i>-12.2</i>	<i>-8.0</i>	<i>-65.7</i>
Parking Services	-3.7	-7.1	-0.8	-2.8	-2.4	-3.7	-1.3	-0.4	-4.3	-5.8	-5.5	-37.6
Concessionary Fares	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	8.1	4.4	3.6	16.1
Other transport	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	18.2	0.1	0.9	19.3
Children Looked After	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	118.2	59.0	27.2	204.4
Safeguarding Children	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	48.4	12.5	15.0	76.0
Other Children's Social Care	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	35.0	12.7	6.4	54.0
Adults Care – 18-64	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	175.1	63.4	30.0	268.6
Adults Care – 65+	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	153.9	48.1	26.8	228.9
Safeguarding Adults	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	40.3	8.5	1.1	49.9
Other Adults Social Care	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	30.9	2.0	9.7	42.6
P. Health children's services	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	16.3	6.7	3.6	26.6
P. Health adults' services	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	19.1	8.6	4.6	32.3
Other Public Health services	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.1	2.5	3.0	9.7
Homelessness	1.4	2.5	0.3	-0.4	0.6	1.6	0.5	0.6	1.0	7.0	4.1	19.1
Housing Benefits admin.	0.9	1.0	0.5	0.6	0.6	1.4	0.3	0.4	0.0	1.6	2.0	9.3
Other Gen. Fund housing	0.2	0.5	0.0	-0.1	0.4	0.5	0.3	0.2	0.0	-0.1	0.8	2.7
Libraries & Archives	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	7.8	2.0	0.7	10.5
Culture, Heritage & Tourism	0.3	2.6	0.0	0.2	0.0	0.0	0.2	0.0	0.1	4.0	1.5	8.8
Sport, Leisure & Parks	5.4	3.2	1.7	-0.2	0.9	2.9	0.5	0.3	2.1	5.3	0.7	22.9
Cemetery & Crematoria	0.2	0.1	-0.1	-0.2	0.0	0.0	-0.2	0.0	0.0	-1.9	-0.8	-2.9
Trading Standards	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.4	0.3	0.2	2.9
Regulatory services	2.0	0.8	-0.1	-0.3	1.3	2.0	0.6	0.7	0.0	0.4	1.4	8.7

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

	East Devon	Exeter	Mid Devon	North Devon	South Hams	Teignbridge	Torridge	West Devon	Devon CC	Plymouth	Torbay	TOTAL COST
NET COST OF SERVICES	43.1	51.8	25.8	36.8	26.2	40.1	21.3	16.9	1,372.9	517.2	319.1	2,471.1

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

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



## Appendix 2 – List of Parishes

### Parishes (extended Exeter)

Ashcombe	Crediton Hamlets	Otterton
Aylesbeare	Dawlish Town	Powderham
Bicton	Dunchideock	Poltimore
Brampford Speke	East Budleigh	Rewe
Broad Clyst	Exminster	Rockbeare
Budleigh Salterton	Exmouth	Shillingford St. George
Cheriton Bishop	Farringdon	Sowton
Chudleigh Town	Hittisleigh	Starcross
Clyst Honiton	Holcombe Burnell	Stoke Canon
Clyst Hydon	Huxham	Tedburn St. Mary
Clyst St Lawrence	Ide	Upton Pyne
Clyst St. George	Kenn	West Hill
Clyst St. Mary	Kenton	Whimble
Colaton Raleigh	Lympstone	Whitestone
Colebrooke	Mamhead	Woodbury
Cranbrook	Newton St. Cyres	
Crediton Town	Nether Exe	

### Parishes (extended Torbay)

Abbotskerswell	Hacombe with	Marldon
Bishopsteignton	Combe	Newton Abbot
Brixham – (Existing Area)	Ideford	Ogwell
Broadhempston	Ipplepen	Shaldon
Coffinswell	Kingskerswell	Stoke Gabriel
Denbury and Torbryan	Kingsteignton	Stokeinteignhead
	Kingswear	Teigngrace
	Littlehempston	Teignmouth

### Parishes (extended Plymouth)

Bickleigh	Holbeton	Ugborough
Brixton	Ivybridge	Yealmpton
Cornwood	Newton and Noss	Wembury
Ermington	Shaugh Prior	
Harford	Sparkwell	



## **Appendix 3- Implementation plan**

Continuing Authority Implementation Plan		Timeline																							
Key Milestones		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046
Phase 1: Programme planning and pre-enquiry activities																									
Submission of formal enquiry proposal			28 Nov 25																						
Secretary General report to Government																									
Ministerial decision to implement a regional																									
Possibility of the Minister instructing LGfE to deliver a structural review of Devon electoral boundaries																									
Plymouth City Council 2026 Elections																									
Phase 2: timely start of implementation programme, upon government decision																									
Parliamentary Approval for Structural Changes Order to expand boundary (Date TBC)																									
Possibility of the Minister instructing LGfE to deliver a structural review of Devon electoral boundaries																									
Phase 3: Implementation Executive - Transition period begins																									
May 2027 Elections - TBC by MHCLG after submission (Plymouth U3, South Hams All out)																									
Budget setting for the existing authority on the new boundary for 2028/29																									
Phase 4: Vesting day - Transition is complete and services operate within extended area.																									
Confirmation or extension of the boundary by LGfE (Date unknown)																									
Completion of boundary review by LGfE (Date unknown)																									
Workstream - Programme Management and Governance		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046
Internal programme support (Legal, HR and financial)																									
MHCLG Agreement / Approval for Continuing Authority																									
Governance established (PMO Reporting/RAGGO/Planning)																									
Detailed transition implementation plan agreed and shared with MHCLG																									
Alignment of existing change activities across councils																									
Council board to oversee the programme in place																									
Delivery of safe & legal May 2027 elections for the existing councils																									
Delivery of safe & legal May 2027 elections for the Unitary Council																									
Boundary Commission Review - TBC - anticipated to start date after the May Election																									
Legal policy and processes in place for the expanded boundary - application of Plymouth City Council policies to the 13 areas and communication of the changes involved to residents																									
Preparation of Day 1 Operation & Service Plans, including staff training and communication of changes created																									
Programme closure and handover to transformation																									
Monitoring and evaluation																									
Benefit realisation																									
Workstream - Community Customer and Partnerships		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046
Development of Neighbourhood Networks Operating Model with Communities (Town/Parish and Community Regd)																									
Ongoing engagement with residents and stakeholders																									
Expand current access arrangements to cover expanded area																									
Neighbourhood Networks operational																									
Workstream - Assets Optimisation (Technology and Property)		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046
Baseline property plan for expanded area, map out what property to onboard																									
Identify business critical data and systems from 13 areas and create transition plan																									
Prepare the onboard new staff																									
Implement transition plan for business critical data and systems from predecessor councils																									
Integrate capital investment programme for 13 areas																									
Use existing data management policy and processes and communicate to staff																									
Use existing security protocols and policies (and communicate to staff)																									
Workstream - People and Culture		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046
Communication Strategy and Plan agreed for all staff																									
HR Transition Management Plan agreed for new staff																									
Existing People and Culture Model shared with new staff																									
External and Internal Communications delivered																									
Develop and Deliver Staff Engagement Plan																									
TUPE transfer of new staff to existing Council																									
Trade Union Engagement for new staff including TUPE arrangements																									
Closure of the workstream and handover as BCU																									
Staff Terms and Conditions and Job Descriptions updated and aligned to existing authority Policy and Process																									
Workstream - Service Alignment and Improvement		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046
Alignment of service requirements																									
New Functional operating Models and Services aligned																									
Service Policy, Process and Procedures Prioritised and updated																									
SLAs and Performance Metrics aligned																									
Revised Membership of Partnership Boards (new area representation on PBs)																									
Service Continuity across predecessor Council Boundaries ensured (either side of vesting day)																									
External Agencies and Statutory Bodies Notified																									
Workstream - Finance		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046
Budget Baseline Defined																									
Implementation budget prepared and in place for 2027/28																									
Agree responsibilities for legacy financial statements with new authorities																									
Agree responsibility for Peninsula Pensions, Pension Fund Accountable Body and Devon Audit Partnership																									
Spending protocol and governance for all authorities in place and monitored																									
Internal Audit Plan, Audit Charter and Risk Strategy reviewed and in place																									
Income / payment arrangements transition and communication																									
Consolidation of grants, fees and charges, and approach to Devolved Funding agreed																									
Council Tax (Equalisation plus Additional National Amounts through MHCLG, collection scheme and rates agreed)																									
Consult on and introduce a new Council Tax Support Policy																									
Business rates collection scheme and billing agreed																									
Consult on business rates																									
Financial Strategy and budget for 2028/29 agreed (incl. aligned capital programmes, Fees and Charges)																									
Write new Treasury Management, Capital and Investment Strategies																									
Existing contracts reviewed and requirement moving forward determined																									
Transfer of company holdings from South Hams to Plymouth Councils																									
Insurance arrangements for the existing authority in place																									
Approach and process for transferring gaming licences to the councils concerned																									
Transfer of assets and liabilities to existing authority completed																									

## **Appendix 4 - Letters of support**



Helen Wylde-Archibald

Chief Executive Officer

Plymouth Chamber of  
Commerce

24th October 2025

Tudor Evans OBE

Leader, Plymouth City Council

**RE: Local Government Reorganisation in Devon**

Dear Tudor,

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

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

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

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

**Devon Chamber**

Unit 5, Derriford Park, Brest Road, Derriford, Plymouth, PL6 5QZ

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Devon Chamber

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PLYMOUTH  
CHAMBER

EXETER  
CHAMBER





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

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

Your sincerely,

*Helen Wylde-Archibald*

**Helen Wylde-Archibald**

**Chief Executive Officer**

**Plymouth Chamber of Commerce**

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

**Devon Chamber**

Unit 5, Derriford Park, Brest Road, Derriford, Plymouth, PL6 5QZ

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HOUSE OF COMMONS

LONDON SW1A 0AA

Tudor Evans OBE  
Leader, Plymouth City Council

30 October 2025

Dear Tudor,

**Local Government Reorganisation in Devon**

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

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

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

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

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

Plymouth Sutton and Devonport  
[luke.pollard.mp@parliament.uk](mailto:luke.pollard.mp@parliament.uk)  
[www.lukepollard.org](http://www.lukepollard.org)  
@lukepollard

Plymouth: 01752 717255 Westminster: 020 7219 2749



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

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

Best wishes,

A handwritten signature in blue ink, appearing to read 'Luke', with a stylized, cursive script.

Luke Pollard MP  
Labour and Co-operative MP for Plymouth Sutton and Devonport



**Fred Thomas MP**  
**Member of Parliament for Plymouth Moor View**

Councillor Tudor Evans OBE  
Leader, Plymouth City Council

23 October 2025

Dear Tudor,

#### **LOCAL GOVERNMENT REORGANISATION IN DEVON**

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

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

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

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

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

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

Best wishes,

*Fred Thomas*

**Fred Thomas MP**  
Labour Member of Parliament for Plymouth Moor View

**House of Commons, London SW1A 0AA**  
**[fred.thomas.mp@parliament.uk](mailto:fred.thomas.mp@parliament.uk)**  
**Telephone: 01752 373404**

22 October 2025

Tudor Evans OBE  
Plymouth City Council

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

Dear Tudor

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely



**Christopher Stephens**

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



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

21<sup>st</sup> October 2025

Tudor Evans OBE  
Leader, Plymouth City Council

Dear Tudor,

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

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

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

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

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

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

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Claire Taylor', written in a cursive style.

Professor Claire Taylor  
Vice-Chancellor and Chief Executive  
Plymouth Marjon University



17 October 2025

Tudor Evans OBE  
Leader, Plymouth City Council

Dear Tudor

**Local Government Reorganisation in Devon**

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

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

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

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

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

Yours sincerely

**Professor Paul Fieldsend-Danks**  
**Vice-Chancellor & Chief Executive**

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

17th October 2025

Tudor Evans OBE  
*Leader, Plymouth City Council*  
Council House  
Armada Way  
Plymouth  
PL1 2AA

## **Local Government Reorganisation in Devon**

Dear Tudor,

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

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

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

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

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

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

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

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

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

Your sincerely,

A handwritten signature in black ink, appearing to be 'Richard Stevens', written over a horizontal line.

**Richard Stevens MBE**  
**Chair, Plymouth Growth Board**



Verena Womersley  
Chair, Plymouth Housing Development Partnership  
C/o Clarion Housing Group  
8 Shelley Way, Plymouth, Devon, PL5 1QF

17 October 2025

Tudor Evans OBE  
Leader, Plymouth City Council

Dear Tudor,

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

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

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

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

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

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

Your sincerely,

**Verena Womersley**  
**Chair, Plymouth Housing Development Partnership**



# UNIVERSITY OF PLYMOUTH

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

Thursday 06<sup>th</sup> November 2025

Dear Tudor,

## **Local Government Reorganisation in Devon**

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

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

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

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

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

Yours sincerely,

**Professor Richard Davies**  
**Vice-Chancellor and Chief Executive**



## Appendix 5 - List of figures and tables

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Figure 3.2	Page 16	A map showing the Plymouth Policy Area	Original content developed by Plymouth City Council to illustrate the Plymouth and South West Devon Joint Local Plan: <a href="#">The Plymouth Plan   SO1 - Delivering the spatial strategy</a>
Figure 3.3	Page 17	A figure showing the Plymouth Metro Local Rail Network	Original content developed by PCC to illustrate the Plymouth Metro Local Rail Network
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Figure 14.3	Page 85	A map showing a 4 District Unitary in the 1-4-5 proposal	Original content developed for this document; derived from <a href="#">Open Geography Portal</a>
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## Appendix 6 - List of acronyms

Acronym	Full Form	Explanation
<b>ASCOF</b>	Adult Social Care Outcomes Framework	National performance measures for adult social care services.
<b>CASD</b>	Continuous At Sea Deterrent	UK's nuclear submarine-based deterrent programme.
<b>CQC</b>	Care Quality Commission	Regulator of health and social care services in England.
<b>DSG</b>	Dedicated Schools Grant	Ring-fenced funding from the Department for Education for schools and education services.
<b>GVA</b>	Gross Value Added	A measure of economic output and productivity.
<b>HRA</b>	Housing Revenue Account	A ring-fenced account for income and expenditure related to council housing.
<b>ICO</b>	Integrated Care Organisation	A partnership model integrating health and social care services.
<b>IDACI</b>	Income Deprivation Affecting Children Index	A sub-measure of deprivation focused on children.
<b>IMD</b>	Index of Multiple Deprivation	A composite measure of relative deprivation across England.
<b>LGBCE</b>	Local Government Boundary Commission for England	Independent body responsible for electoral reviews and boundary changes.
<b>LGR</b>	Local Government Reorganisation	A process led by central government to change how councils are structured and operate in a local area.
<b>MHCLG</b>	Ministry of Housing, Communities and Local Government	Central government department overseeing local government.
<b>MSA</b>	Mayoral Strategic Authority	A proposed regional governance model led by an elected mayor.
<b>MSOA</b>	Middle Layer Super Output Area	A statistical unit of geography used by ONS for data analysis.
<b>MOD</b>	Ministry of Defence	UK government department responsible for defence and armed forces.

<b>Acronym</b>	<b>Full Form</b>	<b>Explanation</b>
<b>ONS</b>	Office for National Statistics	UK's national statistical institute.
<b>PMO</b>	Programme Management Office	A team responsible for governance and coordination of major programmes.
<b>RA</b>	Revenue Account	The budget used for day-to-day service delivery and operational costs. It excludes capital expenditure.
<b>SCO</b>	Structural Change Order	A legal document issued by government that sets out the details of a local government reorganisation, including boundaries, powers, and transition arrangements.
<b>SEND</b>	Special Educational Needs and Disabilities	A term covering children and young people who require additional support.
<b>TUPE</b>	Transfer of Undertakings (Protection of Employment)	Legislation protecting employees when services transfer between organisations.
<b>UKSPF</b>	UK Shared Prosperity Fund	Government fund supporting local economic development and regeneration.
<b>VCSE</b>	Voluntary, Community and Social Enterprise	Sector comprising charities, community groups, and social enterprises.



## Appendix 7 - Key terms explained

Term	Meaning
<b>Unitary authority</b>	A single-tier local government responsible for all local services in its area, replacing the two-tier system of county and district councils.
<b>Continuing authority</b>	An existing council that retains its legal identity and absorbs new areas during reorganisation, rather than being replaced or merged.
<b>Vesting day</b>	The official date when the new council structures come into legal effect and begin operating.
<b>Ministerial modification</b>	A change to a submitted proposal made by the Secretary of State to improve outcomes or align with government priorities.
<b>Neighbourhood networks</b>	Proposed local forums that bring together councillors, parish representatives, and community organisations to influence decisions and improve services.
<b>Parish partnership agreements</b>	Formal arrangements between the new council and parish councils to support collaboration and protect local identity.
<b>Plymouth growth area</b>	A geographic area around Plymouth identified for strategic planning and development, including housing and infrastructure.
<b>Plymouth policy area</b>	A planning concept used in the Joint Local Plan to define the wider area that functions as part of Plymouth's housing and economic region.
<b>Joint Local Plan</b>	A shared planning document developed by multiple councils to guide development and land use across a wider area.
<b>Spatial development strategy</b>	A long-term strategic plan for where development should happen, including housing, transport, and infrastructure.
<b>Electoral review</b>	A formal process to assess and redraw council ward boundaries to reflect population changes and ensure fair representation.
<b>Council tax harmonisation</b>	The process of aligning council tax rates across newly formed or reorganised councils to ensure fairness.
<b>Capital receipts</b>	Money from selling assets.
<b>Implementation executive</b>	A temporary governance body within a continuing authority that oversees the transition to the new arrangements.

<b>Term</b>	<b>Meaning</b>
<b>Shadow council</b>	A temporary council formed before vesting day to prepare for the launch of a new authority.
<b>Extra care housing</b>	Specialist housing designed for older people who need care and support but want to live independently.
<b>Shared lives placements</b>	A form of adult social care where individuals live with a carer in their home, offering a family-style environment.
<b>Freeport</b>	A designated area where normal tax and customs rules do not apply, intended to boost trade and investment.
<b>Local Transport Authority</b>	The body responsible for planning and managing public transport services in a given area.
<b>Enhanced bus partnership</b>	A formal agreement between councils and bus operators to improve services and coordinate investment.
<b>Wellbeing hubs</b>	Local centres offering integrated health, social care, and community services to support residents' wellbeing.
<b>Civic agreements</b>	Formal arrangements recognising the ceremonial roles of mayors and civic leaders across different communities.
<b>Letters patent</b>	A formal legal document issued by the monarch granting rights or status, such as Plymouth's Lord Mayoralty.

## Appendix 8 - Sources

### Data sources and limitations

This proposal draws on a range of data sources to support the case for a four unitary model of governance. Wherever possible, we have used publicly available datasets published by central government departments, statutory bodies, and recognised sector organisations. These include official statistics, financial returns, and performance indicators.

In some instances, we have relied on data that is not publicly available. This includes proprietary analysis commissioned under commercial contract with external consultancies, as well as internal datasets held by participating authorities.

The analysis draws particularly on multiple Office for National Statistics datasets to provide the most accurate picture possible of local populations and service demand. However, detailed population data at small geographical levels is not always published consistently across all the areas we have examined. Where precise figures are unavailable, we have used approximations based on the most appropriate ONS sources for each geography.

This means that some figures represent best estimates rather than exact counts, particularly where we have needed to aggregate or disaggregate data across different statistical boundaries. We have applied consistent methodology throughout to ensure comparability between areas, but readers should be aware that all population figures carry some degree of uncertainty at the level of detail required for this analysis.

For social care demand analysis, we have used public and MSOA level data shared by participating authorities. This data has not been directly incorporated into this proposal, but we note for transparency that it is subject to varying definitions and recording practices between authorities, reflecting different service models and operational approaches. Any future analysis using this data would need to account for these variations.

### Demographic data sources

**Office for National Statistics**, *Population estimates for England and Wales: mid-2024*. Published: July 2025. Available at: [ONS – Population Estimates \[ons.gov.uk\]](https://ons.gov.uk/population/population-estimates)

**Office for National Statistics**, *Census 2021 Small Area Multiples (OA level data) data via Nomis*. Updated regularly. Available at: [https://www.nomisweb.co.uk/sources/census\\_2021](https://www.nomisweb.co.uk/sources/census_2021)

**Ministry of Housing, Communities & Local Government**, *English Indices of Deprivation 2025*. Published: 30 October 2025. Available at: [English indices of deprivation 2025 - GOV.UK](https://www.gov.uk/government/statistics/english-indices-of-deprivation-2025)

## Boundaries and mapping

**Areas of Outstanding Natural Beauty / National Parks / National Landscapes** – [Natural England](#)

**Highways and Roads** - [OS Open Roads](#)

**Open Geography Portal** – [Lower Super Output Area](#), [Middle Super Output Area](#), [Output Areas](#), [Parishes](#), [Wards](#).

## Economic development statistics

**Ministry of Housing, Communities & Local Government**, *Housing and Economic Needs Assessment Guidance*. Last updated: 24 February 2025. Available at: [GOV.UK – Housing Needs Guidance \[gov.uk\]](#)

**Office for National Statistics**, *Regional Gross Value Added (Balanced) by Industry: All ITL Regions*. Published: 17 April 2025. Available at: [ONS – GVA by Industry \[ons.gov.uk\]](#)

**Office for National Statistics**, *Business Register and Employment Survey (BRES): Provisional Results 2023*. Published: 4 November 2024. Available at: <https://www.ons.gov.uk/releases/ukbusinessregisterandemploymentsurveybresprovisionalresults2023revisedresults2022>

**Plymouth City Council**, *Foreign business investment is driving high value jobs in Plymouth*. Published: 13 March 2023. Available at: <https://www.plymouth.gov.uk/news/foreign-business-investment-driving-high-value-jobs-plymouth>

## Local government metrics

Children Services Data

**Department for Education**, *Explore Education Statistics*, published: n.d. Available at: <https://explore-education-statistics.service.gov.uk/>

Adult Social Care Data

**NHS Digital**, *Adult Social Care Activity and Finance Report, England, 2023–24*, published: 31 October 2024. Available at: <https://digital.nhs.uk/data-and-information/publications/statistical/adult-social-care-activity-and-finance-report/2023-24> [digital.nhs.uk]

**Local Government Association**, *LG Inform*, published: n.d. Available at: <https://lginform.local.gov.uk/> [lginform.l...cal.gov.uk]

## Local government initiatives

**Key Cities** *Key Cities: The network that speaks for urban UK.* (n.d.). Available at: <https://keycities.uk>

**UK Government (Homes England).** *Tens of thousands of new homes delivered for communities across England.* Published 17 May 2024. Available at: <https://www.gov.uk/government/news/tens-of-thousands-of-new-homes-delivered-for-communities-across-england>

**Plymouth City Council,** *Plymouth City Council and Homes England launch new City Centre Vision.* Published: 27 March 2025. Available at: <https://www.plymouth.gov.uk/news/plymouth-city-council-and-homes-england-launch-new-city-centre-vision>

**Plymouth City Council.** *Plymouth bus service improvements.* Published: April 2025 Available at: <https://www.plymouth.gov.uk/bus-improvements>.

**Plymouth City Council.** *Plymouth and South Devon Freeport.* Available at: <https://www.plymouth.gov.uk/plymouth-and-south-devon-freeport>.

**Plymouth City Council,** *Launching Team Plymouth: A united city, driving defence innovation and opportunity for all.* Published: 19 September 2025. Available at: <https://www.plymouth.gov.uk/news/launching-team-plymouth-united-city-driving-defence-innovation-and-opportunity-all>

**Plymouth City Council,** *Driving Growth in Plymouth Brochure.* Published: 2019. Available at: <https://democracy.plymouth.gov.uk/documents/s94752/Visitor%20plan%20cabinet%20report%20v5%20PK.pdf>

**Plymouth Sound National Marine Park.** *Homepage – Plymouth Sound National Marine Park.* Published: n.d. Available at: <https://plymouthsoundnationalmarinepark.com/>

## Financial data sources

**Plymouth City Council,** *Council Tax Base Setting and Council Tax Support Scheme 2025/26.* Published: 14 January 2025. Available at: [Decision - Council Tax Base Setting and Council Tax Support Scheme 2025/26 - Modern Council](#)

**Ministry of Housing, Communities and Local Government**  
*Local authority revenue expenditure and financing England: 2025 to 2026 budget individual local authority data.* Published: 19 June 2025.  
Available at: [GOV.UK – Local authority revenue expenditure and financing 2025 to 2026 \[gov.uk\]](#)

**Ministry of Housing, Communities and Local Government** 2025-26 *Local precepting authorities in England: Council Tax data spreadsheet*. Published: 25 April 2025. Available at: [Live tables on Council Tax - GOV.UK](#)

**South Hams District Council** *Draft Statement of Accounts 2024-25*. Published: June 2025. Available at: <https://www.southhams.gov.uk/sites/default/files/2025-06/SH%20Draft%20Statement%20of%20Accounts%202024-25.pdf>

**West Devon Borough Council** *Draft Statement of Accounts 2024-25*. Published: June 2025. Available at: <https://www.westdevon.gov.uk/sites/default/files/2025-06/WD%20Draft%20Statement%20of%20Accounts%202024-25.pdf>

**Mid Devon District Council** *Draft Statement of Accounts 2024-25*. Published: 13 June 2025. Available at: [MDDC Statement of Accounts 2024/25](#)

**North Devon Council** *Draft Statement of Accounts 2024-25*. Published: June 2025. Available at: [Draft statement of accounts 2024-25](#)

**East Devon District Council** *Draft Statement of Accounts 2024-25*. Published: 30 June 2025. Available at: [eddc-statement-of-accounts-2024-25\\_draft\\_.pdf](#)

**Exeter City Council** *Statement of Accounts 2024-25*. Published: 22 August 2025. Available at: [statement-of-accounts-2024-25-unaudited.pdf](#)

**Teignbridge District Council** *Draft Statement of Accounts 2024-25*. Published: 4 July 2025. Available at: [2024-25-draft-statement-of-accounts-with-strata.pdf](#)

**Torbay Council** *Statement of Accounts 2023-24*. Published: August 2024. Available at: [Microsoft Word - Torbay SOA draft 2023-24 v1.1](#)

# Local Government Reorganisation

## Project details

### Assessment author

Joseph Harmer on behalf of the LGR team.

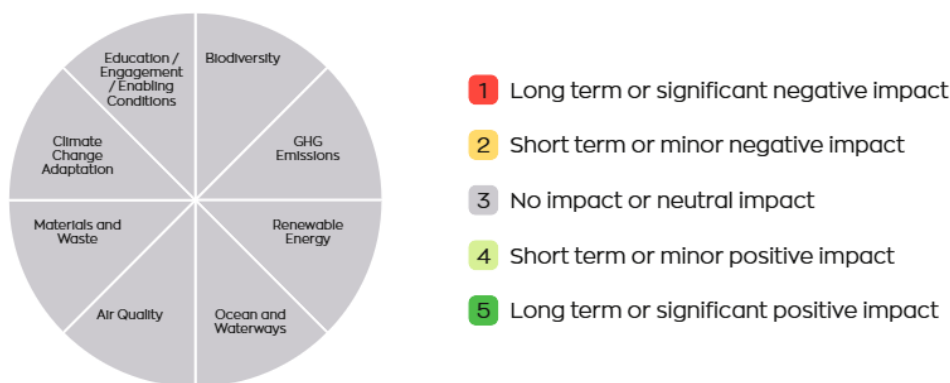
### Project summary

This assessment covers Plymouth's proposal for Local Government Reorganisation.

This Climate Impact Assessment has been undertaken to evaluate the environmental implications of submitting a proposal for Local Government Reorganisation for Devon.

Plymouth City Council is acting in response to a formal government request and does not hold decision-making authority over the implementation of reorganisation, which remain subject to future decisions by the Secretary of State. Accordingly, this assessment evaluates only the strategic intentions stated in the document, based on the foreseeable environmental effects of the proposal.

## Summary of assessment



It is important to note that the likely climate impacts of implementing this proposal, or any competing proposals, are very uncertain at this stage. There is significant uncertainty regarding future governance arrangements mandated by central government, service delivery models, and spatial planning frameworks across Devon, all of which would materially influence environmental outcomes. These uncertainties preclude a robust assessment of long-term climate consequences at this stage.

The large geographical scope and long timescales for the delivery of the proposal, coupled with the absence of a complete baseline environmental profile of the existing administrative area, make it difficult to assess whether the proposal will enhance or degrade the environment, relative to the current situation or competing proposals. The proposal affects a wide range of geographies, from urban areas to rural parishes and the coast. The proposal can affect the medium- and long-term future of the areas in ways that cannot be fully anticipated at this stage. In addition, climate change introduces non-linear and unpredictable pressures on the environment, making forecasting difficult.

However, this assessment demonstrates the strategic commitment of the Council to transparency and environmental responsibility throughout the process and will support further assessment and mitigation planning on a case-by-case basis should implementation proceed.

## Assessment scores

### Biodiversity

#### Score

(3) No impact or neutral impact

#### Score justification

Biodiversity impacts will vary significantly depending on land use changes and development density across the area. Many of these impacts, such as habitat fragmentation, species migration, or tree canopy maturity, unfold over decades. Development projects will take place regardless of Local Government Reorganisation, and can have both beneficial or adverse impacts. For example, while tree planting programmes (such as the Plymouth and South Hams Community Forest) offer long-term benefits, construction and infrastructure expansion will cause ecological disruption.

The proposal states that “rural heritage is recognised and cherished” as part of the vision for the Plymouth area. It commits to strategic planning that “respects local character, protects green spaces, and ensures infrastructure keeps pace with growth.” In addition, the proposal for Plymouth builds on a robust planning framework that already integrates biodiversity protection; the Plymouth, South Hams and West Devon Joint Local Plan.

The expansion of urban governance into rural areas could pose risks to biodiversity if not carefully managed. Equally, this expansion may improve coordination across ecological zones. The proposal’s emphasis on local engagement and safeguarding rural identity present opportunities to better protect biodiversity.

### GHG Emissions

#### Score

(3) No impact or neutral impact

#### Score justification

Assessing the likely impact of the proposed reorganisation on greenhouse gas (GHG) emissions presents significant methodological challenges and could only be speculative at this stage. The scope of the proposal is broad, encompassing multiple sectors and jurisdictions, and the outcomes depend on numerous variables beyond the control of the reorganised authority. These include future investment decisions, national policy shifts, and behavioural responses across diverse communities. For this reason, the proposal is assessed as having a neutral impact on GHG emissions.

Despite the limitations in quantification, the proposal demonstrates a clear strategic intention to uphold best environmental practice. Plymouth City Council’s Net Zero Action Plan, which targets net zero by 2030, is explicitly committed to being scaled across the wider Greater Plymouth area. This extension builds on a robust existing strategy and is supported by major investment in low-carbon transport, district heating, and waste reform.

Existing environmental frameworks, including the Joint Local Plan, provide continuity and safeguards against emissions increases due to development. The proposal acknowledges public concerns, particularly regarding overdevelopment, loss of green space, and urban-led governance. These risks underscore the importance of inclusive environmental governance and tailored planning protections for rural areas.



## Renewable Energy

### Score

(3) No impact or neutral impact

### Score justification

The proposal is assessed as having a neutral impact on renewable energy generation, primarily due to the difficulty of quantifying outcomes at this stage. The scope of the reorganisation is broad, and the deployment of renewable energy infrastructure depends on multiple external factors, including national policy, market conditions, and local planning decisions.

While the proposal does not explicitly prioritise renewable energy, it includes several elements that support low-carbon energy systems. Plymouth's participation in the Advanced Zoning Pilot for district heating is a notable example, with potential to facilitate low-carbon heat networks. The proposal also references the Planning and Infrastructure Bill and the potential development of a Spatial Development Strategy for the Peninsula Mayoral Strategic Authority, both of which could enable coordinated regional planning for renewable energy infrastructure.

## Ocean and Waterways

### Score

(3) No impact or neutral impact

### Score justification

The proposal is assessed as having a neutral impact on waterways and ocean health. This reflects the difficulty of evaluating outcomes in this domain, given the wide geographic scope of the reorganisation and the number of external variables involved. Marine and coastal ecosystems are influenced by national regulation and planning, and infrastructure delivery, much of which lies beyond the control of the reorganised authorities.

While the proposal does not include a dedicated strategy for marine and coastal environments, it references several initiatives that support ocean health, in particular the UK's first National Marine Park, with funding for public engagement, marine conservation, and sustainable economic development. The proposal mentions collaboration with the Environment Agency, SouthWest Water, and the National Trust, though not specifically in relation to marine health.

## Air Quality

### Score

(3) No impact or neutral impact

### Score justification

The proposal is assessed as having a neutral impact on air quality. This reflects the difficulty of determining outcomes at this stage, given the wide scope of the reorganisation and the number of external variables involved. While transport habits are influenced by individual behaviour, local authorities retain significant control over development patterns, transport infrastructure, and planning policy, all of which shape air quality outcomes.

The proposal includes reference to current transport and planning measures that may support improved air quality, particularly in urban areas, with, for example, improvements to public transport, and successful partnerships (Plymouth Enhanced Bus Partnership and Peninsula transport). While the proposal is not intended as a comprehensive environmental strategy, its strategic direction shows good practice.

## Materials and Waste

### Score

(3) No impact or neutral impact

### Score justification

The proposal is assessed as having a neutral impact on waste and materials management.

This reflects the difficulty of evaluating long-term environmental outcomes arising from administrative reorganisation. While local authorities retain control over service design, infrastructure investment, and operational standards, the environmental impact of these changes will ultimately depend on behavioural responses, such as household participation in recycling schemes and food waste separation.

The proposal does not include a quantified waste reduction target or an assessment of how reorganisation will affect waste generation or recycling performance in Devon. These outcomes will be shaped by future service decisions and the extent to which behavioural change is supported and sustained.

In Plymouth and the 13 parishes of the South Hams, the proposal demonstrates a strategic intention to align waste services with environmental best practice, with the introduction of food waste collections and the proposed integration of waste services across the Greater Plymouth area. These measures may over time improve operational efficiency and reduce emissions.

## Climate Change Adaptation

### Score

(3) No impact or neutral impact

### Score justification

The proposal is assessed as having a neutral impact on climate adaptation. This reflects the inherent difficulty in evaluating adaptation outcomes at this stage, given the wide scope of the reorganisation and the number of external variables involved. Climate adaptation depends on long-term planning, behavioural change, and infrastructure delivery, much of which lies beyond the immediate control of the reorganised authorities.

Despite these limitations, the proposal demonstrates a strategic intention to support climate resilience through infrastructure, planning, and governance in the Plymouth and South Hams.

Public engagement highlights the importance of environmental resilience to residents. South Hams respondents raised concerns about infrastructure strain and planning pressures, while Plymouth residents emphasised safety, green infrastructure, and community resilience. These concerns reinforce the need for inclusive governance and locally tailored adaptation strategies.

## Education / Engagement / Enabling Conditions

### Score

(3) No impact or neutral impact

### Score justification

In relation to environmental issues, Plymouth City Council supports community-led climate initiatives, including behaviour change campaigns and local partnerships. Plymouth's Net Zero Delivery Team facilitates the Climate Connections engagement platform and Plymouth Young Climate Ambassadors, engaging residents and young people in shaping the city's climate action plans.


In relation to community empowerment, the proposal puts forward Neighbourhood Networks to bring together councillors, parish representatives, and community organisations.

South Hams residents expressed a strong desire to retain local decision-making and protect rural identity, while Plymouth residents emphasised the need for trust-building, inclusive governance, and environmental education. Both groups valued green spaces, community pride, and responsive governance.

The proposal appears to respond directly to these concerns, particularly through its Neighbourhood Networks and community empowerment model. It builds on existing strengths in Plymouth's community engagement practice and proposes to extend these across the enlarged authority.

# EQUALITY IMPACT ASSESSMENT – LOCAL GOVERNMENT REORGANISATION FINAL PROPOSAL

## SECTION ONE: INFORMATION ABOUT THE PROPOSAL

<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
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<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).  South Hams Survey Out of 403 respondents to the South Hams survey, 288 individuals (71.46%) identified as White. A total of 10 respondents (2.48%) identified as belonging to ethnic minority groups, including 2 Asian or Asian British (0.50%), 2 Mixed or Multiple Ethnic Groups (0.50%), and 6 categorised as Other (not stated) (1.49%). Additionally, 5 respondents (1.24%) selected "Prefer not to say," and 100 respondents (24.81%) did not provide an answer to the ethnicity question.  Plymouth Survey Of the 421 respondents to the Plymouth survey, 290 individuals (68.88%) identified as White. A total of 11 respondents (2.61%) identified as belonging to ethnic minority</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>
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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.	
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