

Project Initiation Document

Local Government Reorganisation programme- Tranche 2- single tier proposal

Version Control

Ver.	Date	Changed by	Change	Sections
1	13/06/25	Claire Berlyn	Document creation	
2	30/6/25	Matthew Fairclough- Kay/JP Hedge/Claire Berlyn	Review following feedback from the board	2, 7,8,9,11
3	01/07/25	Matthew Fairclough- Kay	Minor amends following review	2, 12

1. Purpose

This document defines the objective of the project and how it will be managed and how we will evaluate success.

2. Background

In December 2024 the Government published the English Devolution White Paper setting out its intention to create a single tier of local government (i.e. removing district and county councils and replacing with unitary councils). Reorganisation is also being considered for “those unitary councils where there is evidence of failure or where their size or boundaries may be hindering their ability to deliver sustainable and high-quality services for their residents”.

With the White Paper the Government has commenced an ambitious programme for local government reorganisation (LGR) in the UK. New unitary councils are expected to launch as shadow authorities in May 2027 with Vesting day in April 2028.

In February 2025 Torbay, along with all the councils in Devon, received a statutory invitation from the Ministry of Housing, Communities and Local Government (MHCLG) to develop proposals for a single tier of local government for the county.

The statutory invitation set out 6 criteria that will provide the framework against which the Government will assess all proposals (included as Annex 5).

The invitation created a requirement for Torbay to create a LGR programme. Tranche 1 of the programme delivered interim plans outlining Torbay’s current thinking on LGR. This was completed in March 2025. Tranche 2 will deliver a detailed proposal for LGR in Devon. Dependent on how the Government’s decision impacts Torbay, a third tranche may be required to deliver a major transformation programme that would see Torbay become part of a new unitary authority.

2.1. Interim plans

Torbay’s interim plan submitted in March 2025 outlined three options in order of preference- 1) for Torbay Council to continue in its existing form and boundaries; (2) the creation of a Torbay and South Devon Council based on a catchment area that mirrors the South Local Care Partnership of NHS Devon (boarders including approximately 80% of Teignbridge DC and 50% of South Ham DC) and (3) a Southern Devon Authority (the 1-4-5 model) in which Torbay would combine with South Hams, West Devon and Teignbridge).

The Districts and Boroughs (excluding Exeter) submitted the 1-4-5 model- which set out a 3 unitary option for Devon comprised of: 1) a Southern Devon Authority (as above) 2) a Northern Devon Authority (combined East, Mid and North Devon along with Torridge and Exeter) and 3) for Plymouth to continue in its existing

form and boundaries.

Plymouth, Exeter, Devon CC and North Devon also submitted interim plans, making a total of 6 submissions from Devon's 11 Councils. A summary of the other Devon plans was provided in the Project Mandate.

2.2 MHCLG feedback on interim plans

MHCLG provided feedback on all the interim plans in a single letter on 15 May 2025. Headlines from this feedback include:

1. For final proposals, each council can submit a single proposal for which there must be a single option and geography, and for the area as a whole (i.e. plans must account for the whole of Devon not just their own area).
2. No option being considered was approved or rejected at this stage of the Government's process.
3. Final proposals should address the criteria and be supported by data and evidence. Proposals will be assessed against the criteria. Proposals should clearly set out how the data and evidence supports the outcomes claimed against each criteria, particularly around costs and efficiency savings.
4. A recommendation that all areas work together to develop a single set of assumptions and data set to underpin all proposals, and where this was not possible explicitly explain the where and why of differences.
5. Inclusion of an options appraisal was encouraged.
6. A reiteration that the 500,000 population target was a guiding principle not a hard target, the Government continues to acknowledge the need for flexibility around this, particularly given ambitions around devolution and housing growth. Proposals should include a clear rationale for their proposed approach whether above or below the population target.
7. Where disaggregation of services is being proposed, consideration should be given to impacts and risks in regards to crucial services such as social care, children's services, SEND, homelessness and public safety.
8. A recommendation to outline how each option would interact with the CCA and best benefit the local community.
9. Boundary changes are possible but require a strong justification.
10. Potential impacts on the functions of the National Park Authority should be fully explained.
11. Further information about funding reforms should be available after the Spending Review in June, in the interim MHCLG is open to discussing assumptions further if it will assist with financial planning.
12. Joint working across new unitaries for the delivery of social care services is encouraged.
13. Proposals should consider how the different needs of rural, coastal and urban areas can be met and in particular set out the challenges faced by small cities and how these will be addressed.
14. Council tax harmonisation should be managed through the established flexible system in legislation.

15. Specific to Torbay- ‘You have noted your concern that as part of a larger unitary authority, the challenges currently experienced by Devon County Council in relation to SEND will have a detrimental impact on children and young people in Torbay. In your final proposal(s) it would be helpful to see analysis, including potential benefits, risks and mitigations for the impact of local government reorganisation on SEND services.’
16. Further guidance on the level of information required around **efficiency savings**
- high level breakdowns for where any efficiency savings will be made, with clarity of assumptions on how estimates have been reached and the data sources used, including differences in assumptions between proposals
 - how efficiency savings have been considered alongside a sense of place and local identity.
 - information on the counterfactual against which efficiency savings are estimated, with values provided for current levels of spending
 - a clear statement of what assumptions have been made, and if the impacts of inflation are taken into account
 - a summary covering sources of uncertainty or risks with modelling, as well as predicted magnitude and impact of any unquantifiable costs or benefits
 - quantified impacts, where possible, on service provision as well as wider impacts
17. Further guidance on the level of information required around **financial assessment**
- additional data and evidence to set out how your final proposal(s) would enable financially viable councils, including identifying which option best delivers value for money for council taxpayers
 - further detail on potential finances of new unitaries, for example, funding, operational budgets, potential budget surpluses/shortfalls, total borrowing (General Fund), and debt servicing costs (interest and MRP); and what options may be available for rationalisation of potentially saleable assets
 - clarity on the underlying assumptions underpinning any modelling e.g. assumptions of future funding, demographic growth and pressures, interest costs, Council Tax, savings earmarked in existing councils’ MTFs
 - financial sustainability both through the period to the creation of new unitary councils as well as afterwards
18. Further guidance on the level of information required around **service impacts**
- how each option would deliver high-quality and sustainable public services or efficiency saving opportunities
 - what are the potential impacts of disaggregating services?
 - what would the different options mean for local services provision, for example:
 - i. do different options have a different impact on SEND services and distribution of funding and sufficiency planning to ensure children can access appropriate support, and how will services be maintained?
 - ii. what is the impact on adults and children’s care services? Is there a differential impact on the number of care users and infrastructure to support them among the different options?
 - iii. what partnership options have you considered for joint working across the new unitaries for the delivery of social care services?
 - iv. do different options have variable impacts as you transition to the new unitaries, and how will risks to safeguarding be managed?
 - v. do different options have variable impacts on schools, support and funding allocation, and sufficiency of places, and how will impacts on school be managed?
 - vi. what impact will there be on highway services across the area under the different approaches suggested?
 - vii. what are the implications for public health, including consideration of socio-demographic challenges and health inequalities within any new boundaries and their implications for current and future health service needs. What are the implications for how residents access services and service delivery for populations most at risk?
19. Further guidance on the level of information required around **transition costs**
- it would be helpful to provide more detailed analysis on expected transition and/or disaggregation costs and potential efficiencies of proposals. This could include clarity on methodology, assumptions, data used, what year these may apply and why these are appropriate
 - detail on the potential service transformation opportunities and invest-to-save projects from

unitarisation across a range of services -e.g. consolidation of waste collection and disposal services, and whether different options provide different opportunities for back-office efficiency savings

- where it has not been possible to monetise or quantify impacts, you may wish to provide an estimated magnitude and likelihood of impact
- summarise any sources of risks, uncertainty and key dependencies related to the modelling and analysis
- detail on the estimated financial sustainability of proposed reorganisation and how debt could be managed locally

20. Encouraged to include the costs of standing up an implementation team.

Further MHCLG correspondence received 3 June advised:

1. An allocation of £383,326 has been made to Devon as a proposal development contribution with an expectation that this will be used to support collaborative working and information sharing between councils, particularly an 'effort to build a shared evidence base, including sharing non-public data.'
2. Reiteration that the 500,000 population target is a guiding principle, not a strict target
3. A steer that Neighbourhood area committees (NACs) offer the best model to maximise the structural efficiencies brought about by LGR. NACs will be preferred over new town and parish councils.
4. Where new town and parish councils are being considered they should be funded in a way that avoids further pressure on local authority finances and/or new burdens on the taxpayer.
5. Reiteration that LGA should not distract from BAU, particularly delivery of new Local Plans.

Following this letter the 11 Devon Authorities agreed to split the funding equally and for South Hams/West Devon to receive the funds and make payments to the other councils.

3. Objectives and Deliverables / Products Required

3.1 Objectives

The objective of Tranche 2 of the LGR programme is to deliver a full proposal for LGR in Torbay:

1. Following the clear preference expressed by Members and residents in the course of developing the interim plan, to develop a proposal for Torbay to remain in its current form and boundaries as a unitary authority, subject to further engagement and consultation.
2. Alongside this, as part of the necessary options appraisal, to work with other authorities in Devon regarding the options we submitted in March.

3.2 Deliverables

1. A data sharing agreement..
2. An Engagement and Communications plan for the Torbay project that can be shared as a basis for co-ordinated engagement.
3. Delivery of a public engagement and consultation programme for Torbay, feeding appropriately into other authorities' programmes.
4. Appropriate contributions to the shared data repository/set for a whole-of-Devon single data set.

5. Subject to further engagement and consultation, a full proposal for Torbay to remain in its current form and boundaries as a unitary authority.
6. Appropriate analysis and contributions to the 4's proposal for a Southern Devon Authority and the boarder 1-4-5 proposal it sits within.

The final decision for LGR in Devon rests with Government, this will determine any further deliverables.

4. Project Scope and Exclusions

4.1 Scope

LGR has the potential to impact on every council service, function and process.

The project necessarily has complex interfaces with what happens in the rest of the county and the Government has reiterated its guidance that proposals must cover whole areas. However, the tranche two project is focused on advocating for the best outcomes from LGR for Torbay, its residents, businesses, council staff and partners and other stakeholders.

In this context, it is within the project's gift to:

- To conduct analysis and present an evidence-based argument for the best LGR outcomes for Torbay against the Government's criteria using internally collected data, data shared by other organisations and other data in the public domain.
- Advocate for and work with other authorities towards the creation of a single data set to underpin all of Devon's final proposals to enable the Government to better and more fairly assess their merits.
- Participate in cross organisation and stakeholder meetings and forums as a mature partner and sensible broker.
- Conduct a robust engagement and consultation programme with transparency and according to the Gunning Principles.
- To advocate for and model a coordinated approach to engagement across authorities so we make the most of our time with senior public sector partners and deliver clear and consistent messaging.

4.2 Exclusions

- Is not within scope of the tranche 2 project to deliver a detailed end-to-end design for a new operating model for a new unitary authority. This would be a task for an implementation project. At the proposal stage, modelling for any efficiency savings, transformation costs and impacts on essential services need to be high-level and based on a well-defined set of assumptions.
- Consultation around mayoral devolution will be subject to a completely separate process
- LGR should not delay any existing plans or projects to update Torbay's local plan

- The Combined County Authority (CCA) is not within scope in terms of its current operation

5. Interfaces and Dependencies

5.1. Interfaces

- the outcome of the project may have implications for Torbay's Integrated Care Contract (expiring 2030) and complexities around this will need to be in the foreground of the engagement.
- the Invitation states that CCA timelines need to work for both devolution and LGR priorities. The shape and future of the CCA will need to be considered as proposals are developed.
- discussions around a Mayoral Strategic Authority (MSA) may accelerate in the course of this project and may need to be considered.
- LGR will be an issue for the CQC inspection of Adult Social Care, future Ofsted inspection of Children's Services and outcome of the SEND inspection.
- as the project progresses, the value for money of current business transformation programmes (e.g. the Council Redesign Programme and PARIS replacement) may need review. Any new business change and transformation requirements, or major investments, should be assessed with LGR in view.

5.2 Dependencies

- A dedicated Comms Officer is needed to deliver Torbay's engagement and consultation workstream.
- We require data from Devon CC, particularly around essential services that would be aggregated/disaggregated in new unitary configurations (i.e., CS, ASC, SEND, homelessness, public safety).
- Our ability to deliver a coordinated engagement programme is dependent on other parties agreeing to same and proceeding cooperatively.

6. Constraints

1. Time. The November deadline and need for rigorous governance around decision making creates a very tight timeframe for tranche 2.
2. Time. The challenge and complexity of multiple organisations trying to align on tasks like data sharing and coordinated engagement while working at pace will be significant.
3. Resources. Senior officers will be leading and delivering LGR alongside BAU. Dedicated resource is limited to a full-time project manager and a comms officer.
4. Budget/Time. The Government has made some additional funding for LGR available and suggested it be used for the creation of a single data set. Authorities need to agree on the distribution and use of these funds in a short period of time.
5. Budget. Torbay does not have additional budget to increase resources on the project.
6. Buy-in. LGR is a complex issue moving at pace. Different Authorities hold different positions.

Communicating the range and complexity of issues to stakeholders is a complex task. Buy-in among Members may vary on Party lines. Buy-in from staff could be effected by the demands of BAU and uncertainty about the future of the organisation. Buy-in from the public could be effected by strong views about Torbay, or conversely, indifference or confusion around LGR particularly as it is happening at the same time as the devolution agenda. Buy-in from public sector partners could be effected by confusion over the number of options that are being discussed and uncoordinated engagement by different Authorities.

7. Assumptions

1. We will be able to recruit to the Comms officer position.
2. We will be able to get a data sharing agreement in place with the Districts.
3. We will be able to get a data sharing agreement in place with the County, Exeter and Plymouth.
4. The 2025 Leaders Agreement will facilitate decision making among Torbay Members.
5. That the Districts and Borough's Programme Manager will be able to set up appropriate controls and processes to progress the 1-4-5 proposal.
6. We will be able to build a strong financial case and narrative for Torbay remaining in its current form and boundaries.
7. The Devon Authorities will be able to create a single data set within the required timeframe and that this task will not stall progress on other workstreams.
8. That Torbay will have sufficient resource to engage with other authorities as necessary in support of its objectives.
9. That the 1-4-5 programme will follow a similar timeline and through a similar sequence of tasks as the Torbay project.

8. Initial Project Plan

May – Government feedback on interim plans

Initial engagement with internal Subject Matter Experts

Formation of 'the 4' project board

June - Steer to proceed with approach set out in this PID

Data sharing agreement in place

Proposal template development

Engagement programme commences

July - Drafting Torbay proposal begins

Data collection

Building financial case commences

August - Engagement programme concludes

Drafting Torbay proposal

September - Consultation period

Building financial case concludes

First final draft of Torbay proposal completed

October – Feedback on first draft and revisions

November - Statutory Officer and Council approval of Torbay proposal

28 November – All final proposals due for submission to Government

9. Project Cost (Budget) and Resources

Figures have been included here to provide an indication of the likely costs of LGR for Torbay for the 8 months of the tranche 2 project (March-November 2025). Only direct costs have been estimated, indirect costs have not been included. The estimate is very conservative. Actual costs are likely to be higher.

Estimated budgeted and in-kind costs- **£144,800**

Estimate of additional funding received for LGR – **£35,000**

9.1 Budgeted costs

£80,000 has been allocated to LGR for three years in the 2025/26 base budget. This will be used for salaries for the dedicated Project Manager and Comms Officer. An estimate of **£44,800** has been counted towards costs for tranche 2.

9.2 In kind costs.

Time contributions from:

1. Senior Officers – Anne-Marie Bond, Matthew Fairclough-Clay, Jon-Paul Hedge and Kate Spencer will deliver the project alongside BAU
2. Alan Denby, Amanda Barlow and Malcolm Coe will contribute as board members.
3. Tieneka Akers is managing internal comms. Other members of comms team will contribute to events and document design.
4. Staff from across the Council will be asked to contribute as Subject Matter Experts, providing, data, case studies and insights to inform the proposals or deliver ad-hoc pieces of work like arranging meetings or creating maps and charts.

Very conservatively, a figure of **£100k** has been put against non-dedicated officer time for tranche 2.

9.3 Additional funding

In June 2025 the Government announced a £383,326 allocation to Devon for LGR. It has been agreed that these funds will be equally distributed to the 11 Devon authorities. This amounts to £34,847 each. SHWD is managing payments.

9.4 Other Resources

Torbay has access to financial consultancy services from Pixel Financial Management. The contract for this is held by South Hams/West Devon, final costs are to be shared shortly.

We have contributed to DCCs work with CCN and Newton to develop analysis that would support us to understand local government reform in the context of People Services. This is intended to produce a modelling tool that would allow participant Councils to work through several different LGR scenarios so they could understand the implications of disaggregation/aggregation. The timeline for having access to a working tool is not currently clear.

10. Initial Business Case / Business Benefits

The project is required by statutory invitation and its product is a business case. As such, a business case at PID stage is not a requirement.

The White Paper sets out the theoretical benefits of creating larger unitary authorities. These will be tested through the process of assessing the options and developing full proposals.

11. Risk Log

A risk log has been in place since April 2025. Red rated risks as of 13 June 2025 are included here.

	Risk Description	Mitigation
1	The project has a hard deadline and is being delivered by Officers already at full capacity with BAU. Very little room for slippage. Tight turnaround at Programme Board level is going to be required. Assumption made that approvals will be fairly straightforward. Disagreement, complex issues and corrections may put our ability to deliver by 28 Nov at high risk.	Accept. Put in place strong PM controls.
2	Feedback on interim plans did not discount any option. There will be multiple plans from different authorities being submitted in November. Plans may compete to varying degrees. Torbay will continue to put forth the Torbay as is position as this is what our people have told us is the preferred option. If this is not the outcome for Torbay credibility with the public and stakeholders may be negatively impacted. (Replaces I4, R6,	Accept. Continue to advance options that are in Torbay's interests while supporting other feasible options, demonstrating to Government Torbay's position as a sensible partner and mature broker in the area.

	Risk Description	Mitigation
	R7)	
3	DCC's Inadequate Ofsted rating and how it may play into their LGR position. Their position may become that any option that disaggregates services would further destabilise Children's Services. This would impact on support for the 1-4-5 plan.	Accept.
4	Joining with other areas may have negative impacts on Torbay's balance sheet, quality of Children's Services and SEND provision and leading ASC/Health integration.	Accept. Needs to be foregrounded in the options appraisal.
5	ASC contract. There are a significant number of known unknowns, risks and opportunities around the future of the ICB and LGR. NHS reform adds an additional variable.	Monitor closely and foreground in engagement and consultation.
6	The time, cost and complexity of transitioning to a single finance system/s if organisations are merging. Risk of migrating data. Risks of additional costs of running multiple systems. Risk of not allocating sufficient time and resource to this crucial task or beginning it early enough.	For awareness- may become more relevant in Tranche 3. First task of mitigation would be a mapping exercise.
7	In other areas that have been through LGR some Authorities may have sold off their assets and spent reserves before vesting day undermining the financial assumptions of their business case.	For awareness- may become more relevant in Tranche 3. Having Terms of Reference or some agreement about behaviour between merging parties could be an important part of the success of any model. Further into the process of creating a new unitary the Government would issue a S24 Direction that places limits on what councils can spend on certain contracts and land disposals without previous approval but this may come in too late in the process to prevent significant impacts on a business case.
8	Exhausting stakeholder goodwill if we fail to develop coordinated engagement programmes with other Authorities.	Issue has been recognised among the CEX group. AMB part of discussions.
9	We have been unable to recruit a comms officer to a 6 month fixed term position. Limited internal capacity to cover. Issue will become more acute as time progresses.	Currently looking for candidates at other councils.
10	The work of the Four project may progress to a different plan and timeline than the Torbay proposal.	Accept. See how the Four group establishes itself over May/June
11	Any modelling of efficiency and transition costs will be based on an extensive set of assumptions. These need to be robust and realistic and achievable. There will be risks around different proposals using different assumption and producing data that's not comparable and there will be risks around assumptions being incorrect or disproved in the short term.	Accept. Manage by developing a comprehensive assumptions annex and promoting the important of shared assumptions with all partners.
12	Threat of Judicial Reviews. Risks increased by programme being emerging, that the work is being done at speed and level of resource available for the engagement and consultation piece. A review could stall a transition.	We need to manage both statutory duty and expectations around engagement and ensure that adequately engagement will all groups who feel they have a stake in the outcomes of LGR. This includes and goes beyond the protected characteristics. The equalities impact assessment needs to be robust and tailored.
13	Failure to reach cross party agreement with Members.	Working together agreement now in place. Political Engagement clearly scoped through the project's critical path.
14	Access to data and quality of data (disaggregation, accuracy) from Devon CC on upper tier functions. Includes big ticket items. Needs to be shared openly, ASAP, and at the lowest level possible.	Discussions about data sharing agreements have begun- monitor.

12. Project Organisation Structure

Project Board Membership		
Project Role	Name/Job Title	Responsibilities
Senior Responsible Owner	Anne-Marie Bond	Accountable for successful delivery and recognised as driving the change forward
Senior Users	Matthew Fairclough-Kay Jon-Paul Hedge Alan Denby Kate Spencer Malcolm Coe Amanda Barlow	Represents the individuals using the product or service
Senior Suppliers	Matthew Fairclough-Kay Jon-Paul Hedge Alan Denby Kate Spencer	Represents the interests of those who design, develop, procure and implement the products
Project Manager	Claire Berlyn	Oversees and manages a project
Project Support	NA	Supports with the administration of the project
Subject Matter Experts	Any council officer may be drawn on as an SME	Providing specialised knowledge on a topic and shares the insights with others
Communications lead	Kate Spencer	Overseeing the development and implementation of the engagement and consultation element.
Communications Officer	TBC	Drafting, leading and implementing the engagement and consultation plan.

The board is also representing Torbay on ‘the 4’ project board. The Governance structure for this collaboration between Torbay Council, South Hams District and West Devon Borough Councils and Teignbridge District council has been included as [Appendix 6](#).

Due to the breadth of impact of the project across Devon, authority chief executives meet on a regular basis to ensure oversight and drive collaboration.

13. RACI Matrix

[Included as Appendix 2](#)

14. Project Controls and Reporting

For the Torbay proposal:

- Stand-up board meetings 1 hour a week, 3 out of 4 weeks a month. To review open items, raise new items and for the PM to request steers. Core board members: A-M. Bond, M. Fairclough-Kay, J-P. Hedge, K. Spencer, A. Denby.
- Highlight report meetings 1 hour, 4th week of the month. A full highlight report is provided to the board. The core board is joined by the Legal and Finance statutory officers: A. Barlow, M. Coe.
- Weekly PM updates via email

1-4-5 proposal

- The 4 project (Torbay, South Hams/West Devon and Teignbridge DC) group have a weekly meeting with an agenda. A governance agreement and ToR are in place and an actions log has been set up (These controls are being managed by Torbay)
- As of June 2025 the wider group of the 8 Districts plus Torbay has yet to set up controls and reporting. Following Prince2, responsibility for this would sit with the Programme Manager.

For Torbay, overarching governance will be ensured through regular LGR items at DOM, Cabinet and Shadow Cabinet Meetings. The final submissions to Government will be approved by the Full Council. The full sequence of higher governance meetings is mapped in the project plan and is determining the critical path.

15. Communication Plan

Included as Appendix 3

16. Equality Impact Assessment (EIA)

Included as Appendix 5

More information on the EIA process can be accessed at <https://insight/information/equalities/equality-impact-assessments/>

17. Data Protection Impact Assessment (DPIA)

DPIA checklist submitted to the Information Governance team 12 June 2025

Outcome:

18. Climate Change Impact Assessment

Tranche 2 of the LGR project does not have potential environmental impacts.

However, the proposals that result from Tranche 2 may. For example, meeting the Government's ambitious targets for house building has environmental implications that will need assessment if the programme moves into a Tranche 3.

19. Health and Safety Policies

Tranche 2 of the project fits within the normal duties of the Officers delivering it, all of whom have read the relevant policies and completed the BAU training for their roles such as Use of Display Screen Equipment and DSE assessment and requesting home/hybrid working.

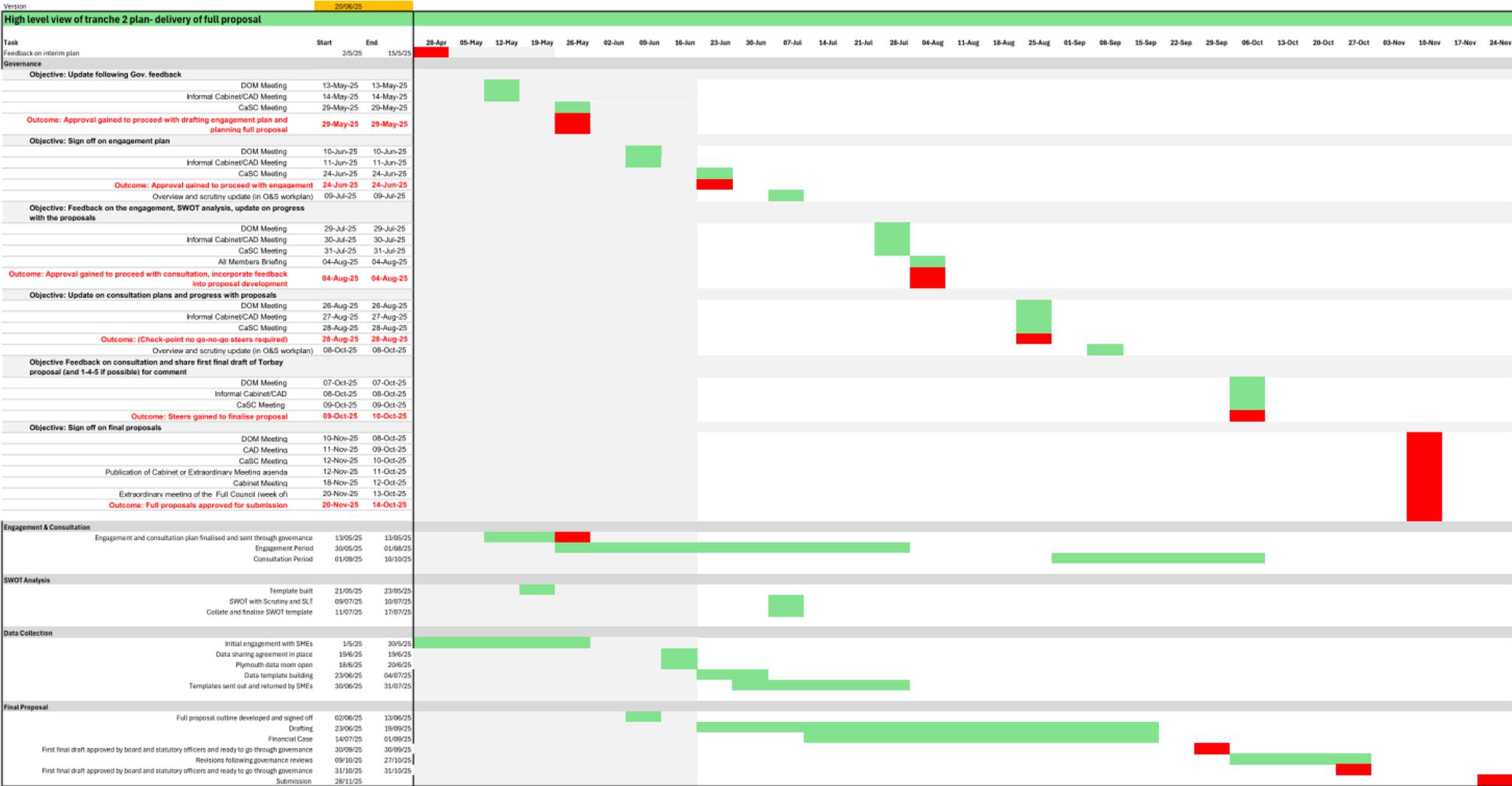
Some Officers may go out into the community to deliver engagement and consultation events. This will be done in accordance with Lone Working and other relevant policies.

As part of the corporate training programme, all staff are aware of how to report any health and safety near misses, incidents or concerns.

Appendices

Appendix 1 – Project Plan

High level view of the plan as of 20 June 2025



Appendix 2 – RACI Matrix

Deliverables	Senior Responsible Owner	Project Manager	Support	Senior User(s)	Senior Supplier(s)	Work Package Lead(s)	Subject Matter Expert(s)
Project Deliverables							
Engagement and consultation strategy	Anne-Marie Bond (A)	Claire Berlyn		Kate Spencer (A)	Kate Spencer	Internal comms- Tieneka Akers (R)	
						Comms officer- TBC	
Data	Anne-Marie Bond (A)	Claire Berlyn		Jon-Paul Hedge (A)	Claire Berlyn	Demographic Maps and charts- Jon-Paul Hedge (A)	Public Health maps- Simon Baker (R)
							Cartographer- Beth Hill (R)
						Finance- Ian Rowsell/Malcom Coe (A)	Pixel (R)
						Economy/Housing (TBC)	Housing/ Planning/Environment David Edmondson (C)
							Housing needs/Homelessness- Mike Parker, Lianne Hancock, (C)
							Regeneration- David Carter (C)
							Economy- Carl Wyard (C)
						Service Reform- Matthew Fairclough-Kay (A)	Finance- Ian Rowsell/Malcom Coe (C, A) Pixel (R)
							CS- Nancy Meehan ASC- Anna Coles (C) PH- Lincoln Saregent (C)

Deliverables	Senior Responsible Owner	Project Manager	Support	Senior User(s)	Senior Supplier(s)	Work Package Lead(s)	Subject Matter Expert(s)
							Public Safety- David Parsons (C) Housing Quality- Rob Kelly (C) Waste, Roads, Place Services- David Carter (C)
						Transition costs- Matthew Fairclough-Kay (A)	Finance- Ian Rowsell/Malcom Coe (C, A) (R)
						Engagement & consultation- Kate Spencer (A)	
						Local Identity- TBC	
						Devolution (CAA)- (TBC)	
Full Proposal	Anne-Marie Bond (A)	Claire Berlyn		Anne-Marie Bond/Matthew Fairclough-Kay (A)	Kate Spencer/Jon-Paul Hedge (drafting support Claire Berlyn) (R)	As per data work packages	
Project Management Deliverables							
Project Mandate	Anne-Marie Bond (A)	Claire Berlyn (R)					
PID	Anne-Marie Bond (A)	Claire Berlyn (R)					
Risk Register	Anne-Marie Bond (A)	Claire Berlyn (R)					
Action Log	Anne-Marie Bond (A)	Claire Berlyn (R)					
Data Plan	Anne-Marie Bond (A)	Claire Berlyn (R)		Jon-Paul Hedge			
Communications Plan	Anne-Marie Bond (A)	Kate Spencer (R)		Kate Spencer			

Appendix 3 – Communications and Engagement Plan

Local Government Reorganisation Communications and Engagement Plan

Version Control

Ver.	Date	Changed by	Change	Sections
1	12/2/25	Kate Spencer	Initial draft for comment	All
2	12/5/25	Kate Spencer/Claire Berlyn	Plan updated, building on the strategy for the second tranche of the project- the full proposal stage	Introduction Objectives Strategy Implementation

1. Introduction

In its English Devolution White Paper, the Government set out that it wants to “facilitate a programme of local government reorganisation for two-tier areas and for those unitary councils where there is evidence of failure or where their size or boundaries may be hindering their ability to deliver sustainable and high-quality services for their residents.”

Subsequently, the Government has invited Torbay Council, alongside Devon County Council, Plymouth City Council and the district councils in Devon to submit a proposal for a single tier of local government across the area.

As required by the invitation, all the Devon authorities submitted interim plans on 21 March 2025. Full proposals are now due to be submitted by 28 November 2025.

In undertaking engagement and consultation in relation local government reorganisation the Council needs to ensure that it adheres to the Gunning Principles whereby consultation is only legitimate if:

1. **Proposals are still at a formative stage**

A final decision has not yet been made, or predetermined, by the decision makers.

2. **There is sufficient information to give ‘intelligent consideration’.**

The information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response.

3. **There is adequate time for consideration and response.**

There must be sufficient opportunity for consultees to participate in the consultation. There is no set timeframe for consultation, despite the widely accepted twelve-week consultation period, as the length of time given for consultee to respond can vary depending on the subject and extent of impact of the consultation.

4. **‘Conscientious consideration’ must be given to the consultation responses before a decision is made.**

Decision-makers should be able to provide evidence that they took consultation responses into account

2. Objectives

The aim of the Engagement and Communication Plan is to ensure that engagement is undertaken to both inform the development of robust proposals and to build a shared understanding of the improvements we expect to deliver through reorganisation.

The objectives of this project are to:

- Share information about the Government’s invitation, the Council’s response and its progress towards a full proposal
- Build insight into what outcomes stakeholders, including residents and businesses, would most like to see from local government reorganisation (LGR)
- Understand the views of stakeholders on the best way to structure local government in our area, taking into account:

- Sensible economic areas and geographies which help increase housing supply and meet housing need
- The impacts on crucial services such as social care, children’s services, SEND and homelessness
- Issues of local identity and cultural and historic importance
- The need to enable strong community engagement and opportunities for neighbourhood empowerment

3. Audience

The following groups within Torbay will be targeted to provide feedback:

- Members of Parliament
- Local Partners and Stakeholders
 - Integrated Care Board
 - Police and Crime Commissioner
 - Fire and Rescue Authority
 - South Devon College
 - Voluntary and third sector
- Residents
- Members of the Council
 - Cabinet
 - Shadow Cabinet
 - All members of the Council
- Members of Staff
 - Directors
 - Senior Leadership Team
 - Senior Managers
 - All members of staff
- Trades Unions
- Businesses
- Members of the Devon and Torbay Combined County Authority

Consideration will also need to be given to how we engage with those same stakeholders within neighbouring district authorities. This will need to include Dartmoor National Park Authority and the universities.

4. Strategy

What is the messaging?

- The Government has asked all the Councils across Devon to work together to develop proposals for local government reorganisation. We are seeking to build empowered, simplified, resilient and sustainable local government which will increase value for money for council tax payers.
- We want to design and implement the best local government structures for efficient and high-quality public service delivery. We want to work collaboratively and proactively to develop robust and sustainable unitary proposals that are in the best interests of the whole area.

- We are working to develop our proposals in accordance with the guidance issued by the Government. A final proposal will be submitted by 28 November 2025. Following submission, the Minister of State for Local Government and English Devolution will consider any and all proposals before taking decisions on how to proceed.
- We will continue to deliver our business-as-usual services and duties which will remain unchanged until reorganisation is complete.
- The Devon and Torbay Combined County Authority came into being on 5 February 2025. The transfer of Government decision-making powers and funding to the Combined County Authority will enable it to tackle local priorities, such as jobs and skills, housing and the environment. It will help the Government's drive to improve productivity and reduce regional disparities. Any new unitary authorities will need to continue to work together with business and education representatives to address priorities such as building more affordable homes, reducing homelessness, improving public transport, and increasing investment in zero-carbon hi-tech and marine jobs and skills.

What are we going to do?

We will deliver this plan via qualitative, targeted communications with key stakeholders, sectors and communities of interest, supported by quantitative communications to engage with broader public audiences and communities of place.

High level initial engagement was carried out ahead of submission of the interim plan in March 2025.

Discussions around potential proposals were held with:

- Leaders and Chief Executives across Devon
- Members of the Place Leadership Board, including the Police and Crime Commissioner, Torbay and South Devon NHS Foundation Trust, South Devon College and the English Riviera Business Improvement District Company; and
- Both of Torbay's Members of Parliament

A public community engagement event was held on 11 March 2025 with around 150 people in attendance. Initial engagement provided a range of key messages that we included in our interim plan. These included: (From public sector and business stakeholders)

- Support for Torbay's boundaries remaining the same but concern this would not meet the Government's population criteria
- That options 2 and 3 (a Torbay and South Devon council and a Southern Devon council respectively) are broadly viable in terms of growth and expansion
- That Torbay offers very different services compared to other areas and this is a strength
- That trusted relationships, knowledge and understanding between the Council and its partners are already in place

(From the public event)

- The majority supported the option for Torbay Council to continue in its existing boundaries.

A thematic analysis of the questions people asked at the event further revealed the central issues that give us insight into what is important to residents around LRG:

- People are proud of Torbay as a place, and recognise the achievements of the Council
- An insistence that what makes Torbay unique should be taken into account. This ranges across existing investments in place continuing to benefit local people, visitors and tourism, Torbay as an urban centre in comparison to more rural parts of the county, and local challenges around poverty and housing
- Concern that Torbay should receive its fair share of any pot if there are changes in Local Government arrangements
- Concern about services, especially health care
- Concerned about changes to Council Tax.

For the second tranche of the programme, as we work towards a full proposal, we will hold a further round

of engagement around the options and a consultation on the preferred option. We will:

- Work with other authorities to plan a co-ordinated strategy to engage and consult with county-wide stakeholders so that demands on these partners are managed as well as enabling discussions to explore and understand the inter-relationships between potential future options in a consistent manner.
- Where possible, make use of existing forums and meetings to engage with stakeholders in Torbay

Given that stakeholders have expressed a clear preference for Torbay continuing in its existing boundaries, and that decision making on this ultimately sits with the Government, it will be important to clearly and transparently manage expectations with stakeholders. To this end, we recognise that conversations need to go beyond opinions on the different options and we will seek to orient engagement around three themes:

1. Outcomes from LGR
2. Local Identities
3. Civic Engagement

Each will provide indicators against which we can assess and compare any option. The first will help us to understand the outcomes people and partners would most like to see from LGR and provide us with preferred principles for the future shape of local government in Devon. The second will provide insight around how people build and inhabit their communities; going beyond the common measure of travel to work, we want to learn more about where people spend their time, spend their money, and invest their energy to build maps of local identity within and beyond the Bay. Finally, through the third theme of civic engagement we want share information about the emerging programme for LGR in Devon and build our understanding of the factors that may facilitate or inhibit community empowerment.

What channels will we use?

- **Attendance at, and holding of, meetings**

Face-to-face communication and engagement is important to allow for discussion on specific topics, ensuring that feedback is captured and used to demonstrate open, transparent democratic accountability.

- **E-newsletters**

The Council already has a range of newsletters with a significant subscriber base. These will be used to share information with residents and businesses across Torbay.

- **Website**

A dedicated page on the Council's website has been established which will host information about the development to proposals for local government reorganisation. This will be updated on a regular basis. We will be able to signpost stakeholders to the website for more detailed information.

- **Social media channels**

Our social media channels have a large number of subscribers/users. Specific templates for social media posts relating to local government reorganisation will be developed. Posts can signpost stakeholders to events and engagement activity as well as being a means to collect views.

- **Media releases**

At significant milestones through the development of proposals, media releases will be issued for onward sharing through online news outlets, newspapers, magazines, TV and radio. This will be supplemented by articles, interviews and quotes from the Leader of Torbay Council (such as Leaders Columns in local newspapers).

- **Internal engagement channels**

Existing internal engagement channels within Torbay Council will be used to ensure that all members of staff are aware of the key milestones in the development to proposals, to seek their input as well as providing reassurance about the impact or otherwise on their existing roles.

- **Direct communication**

A database of stakeholders will be created and, working on the principle of "networks of networks", direct communication to these stakeholders will help to ensure communications are shared with those not ordinarily engaged by Torbay Council.

5. Implementation

Preparation and submission of interim plan

When	Who	What
20 February 2025	<ul style="list-style-type: none"> CAD 	<ul style="list-style-type: none"> Next steps in relation to local government reorganisation Requirements from the Government Planned approach to developing proposals
25 February 2025	<ul style="list-style-type: none"> Cabinet and Shadow Cabinet 	<ul style="list-style-type: none"> Next steps in relation to local government reorganisation Requirements from the Government Planned approach to developing proposals
26 February 2025	<ul style="list-style-type: none"> All Councillors 	<ul style="list-style-type: none"> Invite to All Councillor Briefing Outline explanation of 1:4:5 option ahead of Joint Statement Details of public engagement event
28 February	<ul style="list-style-type: none"> District Councils 	<ul style="list-style-type: none"> Joint Statement on 1:4:5 proposal issued
	<ul style="list-style-type: none"> All Staff 	<ul style="list-style-type: none"> Staff News update on current position
	<ul style="list-style-type: none"> Torbay Champions Network One Torbay e-newsletter 	<ul style="list-style-type: none"> Notification of Public Engagement Event
4 March 2025	<ul style="list-style-type: none"> Torbay Business Forum Breakfast 	<ul style="list-style-type: none"> Signposting to the Public Engagement Event
	<ul style="list-style-type: none"> All Councillor Briefing 	<ul style="list-style-type: none"> Next steps in relation to local government reorganisation Requirements from the Government Planned approach to developing proposals
5 March 2025	<ul style="list-style-type: none"> Torbay Leadership Place Board 	<ul style="list-style-type: none"> Feedback on emerging Interim Plan Direct 1-2-1 written feedback
11 March 2025	<ul style="list-style-type: none"> Public Engagement Event 	<ul style="list-style-type: none"> Next steps in relation to local government reorganisation Requirements from the Government Planned approach to developing proposals Outline for further engagement
12-14 March 2025	<ul style="list-style-type: none"> Cabinet 	<ul style="list-style-type: none"> Publication of report for consideration by Cabinet on 18 March
	<ul style="list-style-type: none"> All Staff 	<ul style="list-style-type: none"> Staff News update on proposed interim plan
	<ul style="list-style-type: none"> Torbay Champions Network One Torbay e-newsletter 	<ul style="list-style-type: none"> Signposting to proposed interim plan and meeting of the Cabinet
14 March 2025	<ul style="list-style-type: none"> Residents Engagement Event 	<ul style="list-style-type: none"> Signposting to proposed interim plan Opportunity for members of the public to ask questions on the proposed interim plan
17 March 2025	<ul style="list-style-type: none"> SLT Hot Topics (extended) 	<ul style="list-style-type: none"> Briefing for SLT members on the options within the interim plan Opportunity for staff to ask questions on the proposed interim plan Signposting of Ask Us Anything on 20 March
18 March 2025	<ul style="list-style-type: none"> Cabinet 	<ul style="list-style-type: none"> Consideration of submission of interim plan
20 March 2025	<ul style="list-style-type: none"> Ask Us Anything 	<ul style="list-style-type: none"> Opportunity for staff to ask questions on the agreed interim plan
21 March 2025	<ul style="list-style-type: none"> Member briefing Staff News Media release Letter to MPs 	<ul style="list-style-type: none"> Submission of Interim Plan Creation of web pages for phase 2 engagement

	<ul style="list-style-type: none"> One Torbay article 	
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Preparation and submission of final proposal – further details to be added, including member and staff involvement

When	Who	What
31 May/1 June (Air Show)	<ul style="list-style-type: none"> Residents Engagement Event at English Riviera Air Show 	<ul style="list-style-type: none"> Awareness raising of LGR Mapping of our communities and the connections Understanding of where people get their information
9 June – 20 July	<ul style="list-style-type: none"> Stakeholders Residents Staff Members 	<ul style="list-style-type: none"> Engagement on: <ul style="list-style-type: none"> Outcomes from LGR Local Identities Civic Engagement Specific details to be agreed
Mid June	<ul style="list-style-type: none"> Cross Authority Engagement with Senior Partners <ul style="list-style-type: none"> Police and Crime Commissioner Devon ICB FE/HE institutions Fire and Rescue Authority National Park Authorities Reps of the voluntary and third sector 	<ul style="list-style-type: none"> Meeting to enable all the Councils to share feedback on interim plans and discuss implications
9 July 2025	<ul style="list-style-type: none"> Overview and Scrutiny Board 	
End of July	<ul style="list-style-type: none"> Cross Authority Engagement with Senior Partners (as above) 	<ul style="list-style-type: none"> Meeting to enable all the Councils to share emerging options appraisal and feedback from engagement
1 September – 12 October	<ul style="list-style-type: none"> Stakeholders Residents Staff Members 	<ul style="list-style-type: none"> Consultation of preferred option Specific details to be agreed Residents Satisfaction Survey taking place at this time as well
Sept/Oct	<ul style="list-style-type: none"> Cross Authority Engagement with Senior Partners (as above) 	<ul style="list-style-type: none"> All the Councils to meet stakeholders (grouped by sector) to discuss the impacts of the preferred option. To take place during the consultation period.
8 October 2025	<ul style="list-style-type: none"> Overview and Scrutiny Board 	

6. Scoring / Evaluation

INPUTS (This is the work you do before or during the campaign planning)	OUTPUTS (What is delivered and audience reached)	OUTTAKES (responses to content – what qualitatives can be measured i.e. no. of consultations completed, no. of webpage hits, press coverage)	OUTCOMES (what is the result you want? How will you know the campaign has been a success?)
Communications planning	Facebook and Twitter posts	Reach on our corporate social media channels including Facebook and Twitter (shares, likes,	Views from engagement and consultation reflected within the final proposal
Insight	Press releases		

Audience segmentation	Internal communications messages	retweets).	Enhancing Torbay Council's reputation with people feeling their views have been heard.
Researching channels and opportunities	GovDelivery bulletins – One Torbay, Staff News etc	Conversion rate / click-throughs from our social media channels and e-newsletter through to corporate website.	Strengthening Torbay Council's links with local community groups.
Liaising with communications leads in partner organisations.	Events held	Feedback and sentiment from followers on our Facebook and Twitter channels.	
Graphic design for social media posts and other channels		Number of people engaged with	
Drafting content		Number of consultation questionnaires completed	

Appendix 4 – Equality Impact Assessment (completion of the EIA is mandatory)

The Council has a public sector duty under the Equality Act 2010 to have ‘due regard’ to equality and to advancing equality of opportunity between those persons who share a relevant protected characteristic and persons who do not share it. The Act also seeks to eliminate discrimination, harassment and victimisation and promote cohesion. It is important that you carefully and thoroughly consider the different potential impacts that the decision being taken may have on people who share protected characteristics.

It is not enough to state that a proposal will affect everyone equally. There should be thorough consideration as to whether particular groups or individuals are more likely to be affected than others by the proposals and decision. Please complete the table below. If you consider there to be no positive or negative impacts state ‘there is no differential impact’.

The EIA has been completed for tranche 2 of the programme and therefore has only considered impacts around reaching a full proposal for LGR. If there is a tranche three project implementing organisational and service changes this will require its own assessment.

Protected characteristics under the Equality Act and groups with increased vulnerability	Data and insight	Equality considerations (including any adverse impacts)	Mitigation activities For all groups we are planning early engagement with the Inclusion Partnership, both as a stakeholder for LGR and to help shape further engagement activities.	Responsible department and timeframe for implementing mitigation activities
Age	18 per cent of Torbay residents are under 18 years old. 55 per cent of Torbay residents are aged between 18 to 64 years old. 27 per cent of Torbay residents are aged 65 and older.	LGR could affect the services provided to children, adults and older people. Everybody should have opportunities to share their views on potential changes. Our engagement and consultation strategy may need to take additional steps to achieve this.	Engagement and consultation activities delivered through different channels (media, venues, existing groups) to reach people of different ages.	Comms. June- September 2025.
Carers	At the time of the 2021 census there	LGR could affect the services provided to carers	Engagement and	Comms.

Protected characteristics under the Equality Act and groups with increased vulnerability	Data and insight	Equality considerations (including any adverse impacts)	Mitigation activities	Responsible department and timeframe for implementing mitigation activities
	were 14,900 unpaid carers in Torbay. 5,185 of these provided 50 hours or more of care.	and the people they care for. Our engagement and consultation strategy may need to take additional steps to ensure this group has adequate opportunities to share their views on potential changes.	consultation activities targeted at carers groups.	June- September 2025.
Disability	In the 2021 Census, 23.8% of Torbay residents answered that their day-to-day activities were limited a little or a lot by a physical or mental health condition or illness.	LGR could affect the services provided to people who identify as having a disability. Our engagement and consultation strategy may need to take additional steps to ensure this group has adequate opportunities to share their views on potential changes.	Engagement and consultation activities targeted at disability groups. Providing different ways to participate (e.g., having a join online option for any in-person events). Holding in-person events at accessible venues. Online information meets our accessibility standards.	Comms. June- September 2025.
Gender reassignment	In the 2021 Census, 0.4% of Torbay's community answered that their gender identity was not the same as their sex registered at birth. This proportion is similar to the Southwest and is lower than England.	LGR could affect the services accessed by people who identify with this protected characteristic. Impacts could be felt directly in terms of changes to the services people use or more indirectly. For example, this group might be at risk of being disproportionately affected if the delivery of public safety services changed in Torbay.	Engagement and consultation activities targeted at advocacy and other groups.	Comms. June- September 2025.

Protected characteristics under the Equality Act and groups with increased vulnerability	Data and insight	Equality considerations (including any adverse impacts)	Mitigation activities	Responsible department and timeframe for implementing mitigation activities
		Our engagement and consultation strategy may need to take additional steps to ensure this group has adequate opportunities to share their views on potential changes.		
Marriage and civil partnership	Of those Torbay residents aged 16 and over at the time of 2021 Census, 44.2% of people were married or in a registered civil partnership.	LGR could affect the services accessed by people who are married or in civil partnership. Our engagement and consultation strategy may need to take additional steps to ensure this group has adequate opportunities to share their views on potential changes.	Engagement and consultation activities delivered through different channels (media, venues, existing groups) to give people different ways to participate.	Comms. June- September 2025.
Pregnancy and maternity	Over the period 2010 to 2021, the rate of live births (as a proportion of females aged 15 to 44) has been slightly but significantly higher in Torbay (average of 63.7 per 1,000) than England (60.2) and the South West (58.4). There has been a notable fall in the numbers of live births since the middle of the last decade across all geographical areas.	LGR could affect the services accessed by people experiencing pregnancy and maternity. Our engagement and consultation strategy may need to take additional steps to ensure this group has adequate opportunities to share their views on potential changes.	Engagement and consultation activities delivered through different channels (media, venues, existing groups) to give people different ways to participate. Activities planned at child friendly venues and times (e.g., daytime at libraries).	Comms. June- September 2025.
Race	In the 2021 Census, 96.1% of Torbay residents described their ethnicity as white. This is a higher proportion than the South West and England. Black, Asian and minority	Because of the correlations between race and higher levels of deprivation LGR may have disproportionate impacts on different groups of people under this category.	Engagement and consultation activities targeted at advocacy and other groups.	Comms. June- September 2025.

Protected characteristics under the Equality Act and groups with increased vulnerability	Data and insight	Equality considerations (including any adverse impacts)	Mitigation activities	Responsible department and timeframe for implementing mitigation activities
	ethnic individuals are more likely to live in areas of Torbay classified as being amongst the 20% most deprived areas in England.	Our engagement and consultation strategy may need to take additional steps to ensure this group has adequate opportunities to share their views on potential changes.		
Religion and belief	64.8% of Torbay residents who stated that they have a religion in the 2021 census.	Some people may be more vulnerable to discrimination based on their religion and beliefs. These groups could be impacted by things like changes to public safety services.	Engagement and consultation activities targeted at faith-based groups.	Comms. June- September 2025.
Sex	51.3% of Torbay's population are female and 48.7% are male	<p>Sex and other protected characteristics may combine to create some different or disproportionate impacts for different people. For example, people who identify as female and pregnancy and maternity.</p> <p>The different roles males and females tend to take in society may pattern the potential impacts of LGR in some different ways. For example, females tend to take on the bulk of caregiving so could be more affected by changes around services for young people, older people and people with disabilities. Males are more likely to experience homelessness and would be more affected by changes to those services.</p> <p>Our engagement and consultation strategy should make efforts to cover full breadth of services that could be affected by LGR.</p>	Engagement and consultation activities delivered through different channels (media, venues, existing groups) to give people different ways to participate.	Comms. June- September 2025.
Sexual orientation	In the 2021 Census, 3.4% of those	LGR could affect the services accessed by	Engagement and	Comms.

Protected characteristics under the Equality Act and groups with increased vulnerability	Data and insight	Equality considerations (including any adverse impacts)	Mitigation activities	Responsible department and timeframe for implementing mitigation activities
	<p>in Torbay aged over 16 identified their sexuality as either Lesbian, Gay, Bisexual or, used another term to describe their sexual orientation.</p>	<p>people who identify with this protected characteristic.</p> <p>Impacts could be felt directly in terms of changes to the services people use or more indirectly. For example, this group might be at risk of being disproportionately affected if the delivery of public safety services changed in Torbay.</p> <p>Our engagement and consultation strategy may need to take additional steps to ensure this group has adequate opportunities to share their views on potential changes.</p>	<p>consultation activities targeted at advocacy and other groups.</p>	<p>June- September 2025.</p>
Armed Forces Community	<p>In 2021, 3.8% of residents in England reported that they had previously served in the UK armed forces. In Torbay, 5.9 per cent of the population have previously served in the UK armed forces.</p>	<p>People who have been in the armed services may be at higher risk of experiencing homelessness or requiring mental health support. They could therefore be disproportionately impacted by changes to services brought about by LGR.</p> <p>Our engagement and consultation strategy may need to take additional steps to ensure this group has adequate opportunities to share their views on potential changes.</p>	<p>Engagement and consultation activities targeted at advocacy and other groups.</p>	<p>Comms. June- September 2025.</p>
Additional considerations				
Socio-economic impacts (Including impacts on child	Overall, the risks of LGR are more likely to disproportionately affect	If Torbay becomes part of a wider area how the higher levels of need in Torbay are going to be	In tranche 2 this can be addressed in two ways:	Comms. June- September

Protected characteristics under the Equality Act and groups with increased vulnerability	Data and insight	Equality considerations (including any adverse impacts)	Mitigation activities	Responsible department and timeframe for implementing mitigation activities
poverty and deprivation)	more disadvantaged groups in Torbay because these groups will have higher levels of service use than other groups in the community.	<p>meet will be a critical issue in designing an operating model for a new unitary. This will range from how services are funded to the location of services and staffing numbers across different geographical areas.</p> <p>In a new organisation some of the non-statutory services Torbay currently provides may be defunded. This could include early intervention and prevention initiatives that are supporting the most vulnerable.</p> <p>Staff resource and physical offices may become more remote making services harder to access for some.</p> <p>Council presence in Town Centres could change increasing risks for all residents and visitors but particularly the most vulnerable.</p>	<p>For all groups we are planning early engagement with the Inclusion Partnership, both as a stakeholder for LGR and to help shape further engagement activities.</p> <ol style="list-style-type: none"> 1. Ensuring engagement and consultation reaches a wide audience so the views of those more likely to be negatively impacted by LGR are captured 2. Advocating for Torbay and it's most vulnerable residents in our proposals through consistently messaging the higher levels of need and Torbay's current strengths. 	<p>2025.</p> <p>Writing task and finish group June-November 2025.</p>
Public Health impacts (Including impacts on the general health of the population of Torbay)	Some options being considered may impact the Public Health grant for Torbay.	<p>Links between levels of deprivation and health outcomes.</p> <p>Less Public Health funding will disproportionately impact on groups already more vulnerable to poorer outcomes.</p>	<p>Inclusion of this issue in engagement and consultation comms.</p> <p>Advocating for LGR options that will deliver the best outcomes for Torbay residents.</p>	<p>Comms. June- September 2025.</p> <p>Writing task and finish group June-November 2025.</p>
Human Rights impacts				

Protected characteristics under the Equality Act and groups with increased vulnerability	Data and insight	Equality considerations (including any adverse impacts)	Mitigation activities	Responsible department and timeframe for implementing mitigation activities
Child Friendly	Torbay Council is a Child Friendly Council and all staff and Councillors are Corporate Parents and have a responsibility towards cared for and care experienced children and young people.	Some LGR outcomes could potentially effect the delivery of services to children and young people and their current education options.	<p>Inclusion of this issue in engagement and consultation comms.</p> <p>Advocating for LGR options that will deliver the best outcomes for Torbay residents.</p>	<p>Comms. June- September 2025.</p> <p>Writing task and finish group June- November 2025.</p>

Appendix 5 - Guidance from the Secretary of State for proposals for unitary local government.

Under the Local Government and Public Involvement in Health Act 2007 ('the 2007 Act') proposals may be for:

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

Criteria for unitary local government

1. A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government.

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

2. Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks.

- a) As a guiding principle, new councils should aim for a population of 500,000 or more.
- b) There may be certain scenarios in which this 500,000 figure does not make sense for

an area, including on devolution, and this rationale should be set out in a proposal.

c) Efficiencies should be identified to help improve councils' finances and make sure that council taxpayers are getting the best possible value for their money.

d) Proposals should set out how an area will seek to manage transition costs, including planning for future service transformation opportunities from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects.

e) For areas covering councils that are in Best Value intervention and/or in receipt of Exceptional Financial Support, proposals must additionally demonstrate how reorganisation may contribute to putting local government in the area as a whole on a firmer footing and what area-specific arrangements may be necessary to make new structures viable.

f) In general, as with previous restructures, there is no proposal for council debt to be addressed centrally or written off as part of reorganisation. For areas where there are exceptional circumstances where there has been failure linked to capital practices, proposals should reflect the extent to which the implications of this can be managed locally, including as part of efficiencies possible through reorganisation.

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

a) Proposals should show how new structures will improve local government and service delivery, and should avoid unnecessary fragmentation of services.

b) Opportunities to deliver public service reform should be identified, including where they will lead to better value for money.

c) Consideration should be given to the impacts for crucial services such as social care, children's services, SEND and homelessness, and for wider public services including for public safety.

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

a) It is for councils to decide how best to engage locally in a meaningful and constructive

way and this engagement activity should be evidenced in your proposal.

b) Proposals should consider issues of local identity and cultural and historic importance.

c) Proposals should include evidence of local engagement, an explanation of the views that have been put forward and how concerns will be addressed.

5. New unitary structures must support devolution arrangements.

a) Proposals will need to consider and set out for areas where there is already a Combined Authority (CA) or a Combined County Authority (CCA) established or a decision has been taken by Government to work with the area to establish one, how that institution and its governance arrangements will need to change to continue to function effectively; and set out clearly (where applicable) whether this proposal is supported by the CA/CCA /Mayor.

b) Where no CA or CCA is already established or agreed then the proposal should set out how it will help unlock devolution.

c) Proposals should ensure there are sensible population size ratios between local authorities and any strategic authority, with timelines that work for both priorities.

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

a) Proposals will need to explain plans to make sure that communities are engaged.

b) Where there are already arrangements in place it should be explained how these will enable strong community engagement.

Developing proposals for unitary local government

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

Boundary Changes

a) Existing district areas should be considered the building blocks for your proposals, but where there is a strong justification more complex boundary changes will be considered.

b) There will need to be a strong public services and financial sustainability related justification for any proposals that involve boundary changes, or that affect wider public services, such as fire and rescue authorities, due to the likely additional costs and complexities of implementation.

Engagement and consultation on reorganisation

a) We expect local leaders to work collaboratively and proactively, including by sharing information, to develop robust and sustainable unitary proposals that are in the best interests of the whole area to which this invitation is issued, rather than developing competing proposals.

b) For those areas where Commissioners have been appointed by the Secretary of State as part of the Best Value Intervention, their input will be important in the development of robust unitary proposals.

c) We also expect local leaders to engage their Members of Parliament, and to ensure there is wide engagement with local partners and stakeholders, residents, workforce and their representatives, and businesses on a proposal.

d) The engagement that is undertaken should both inform the development of robust proposals and should also build a shared understanding of the improvements you expect to deliver through reorganisation.

e) The views of other public sector providers will be crucial to understanding the best way to structure local government in your area. This will include the relevant Mayor (if you already have one), Integrated Care Board, Police (Fire) and Crime Commissioner, Fire and Rescue Authority, local Higher Education and Further Education providers, National Park Authorities, and the voluntary and third sector.

f) Once a proposal has been submitted it will be for the Government to decide on taking a proposal forward and to consult as required by statute. This will be a completely separate process to any consultation undertaken on mayoral devolution in an area, which will be undertaken in some areas early this year, in parallel with this invitation.

Appendix 6 – ‘The 4’ project Governance structure and TOR

LGR Southern Devon Authority (the Four) project

Governance structure & Draft TOR

Purpose

The purpose of this document is to set out the governance structure which will oversee and control the project to create the full proposal for a Southern Devon Authority (henceforth **‘the Four’ project**). This will be a living document for the Four project and necessarily discusses the overall structure of the wider Local Government Reorganisation (LGR) programme, which includes a concurrent project for ‘the Five,’ which will lead the proposal for an Exeter & Northern Devon Authority.

Background

The Four project has been created by the interim plan for LGR in Devon *Finding the Balance, Building the Future (the 1-4-5 plan)* authored by the District Councils (excluding Exeter City Council) with Torbay Council.

The plan sets out a proposal for 3 unitary authorities in Devon: **a Southern Devon Authority** comprised of South Hams, West Devon, Teignbridge and Torbay; **a Northern Devon Authority** comprised of East, Mid and North Devon along with Torridge and Exeter; and for Plymouth to continue in its existing form and boundaries.

The 1-4-5 plan was submitted on 21 March 2025 and we are now working to submit a full proposal by 28 November 2025.

To achieve this, we require a programme with an appropriate governance structure.

A formal project management approach is required due to:

- the Government’s clear vision and ambitious timeline for simpler, more sustainable, local government structures, alongside a transfer of power out of Westminster through devolution
- to protect the quality of our existing services
- to set expectations for and achieve highly effective cross-organisation collaboration
- to identify and manage the resources that will be required to deliver a full appraisal of the preferred option for a Southern Devon Authority, and a full proposal for the whole area
- to plan for, resource and coordinate effective stakeholder engagement and consultation.

Programme structure

The programme will be comprised of two project teams:

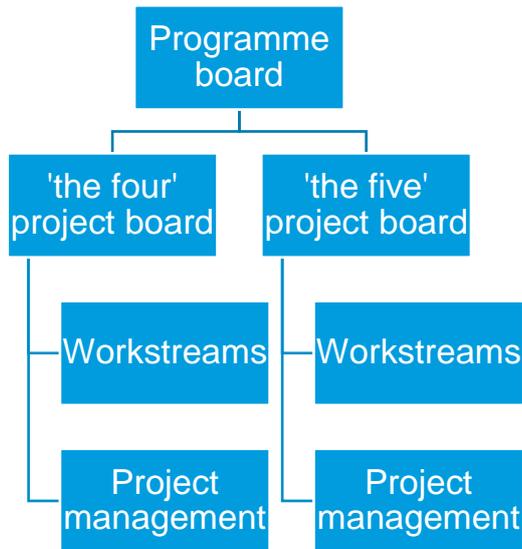
‘the four’ Southern Devon Authority project	‘the five’ Exeter & Northern Devon Authority project
<u>Partners/Users:</u> South Hams DC West Devon BC Teignbridge DC Torbay Council	<u>Partners/Users:</u> East Devon DC Mid Devon DC North Devon DC Torridge DC

Assumptions:

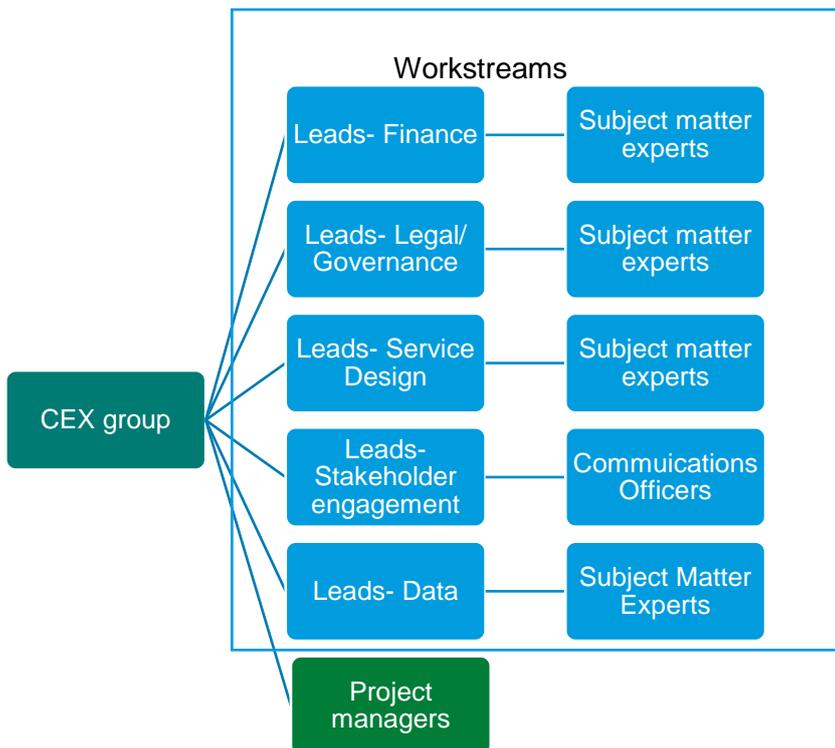
- Plymouth has not been included in the programme structure as the 1-4-5 plan assumes that their form and boundaries will remain unchanged and/or they will pursue their own plans for business case submission for an ‘expanded’ Plymouth.
- The Northern project will work to reengage Exeter City Council.

Governance Structure

Programme Structure



Project Structure for 'the Four'



Definitions

Programme board

Members: CEX groups from the Four and Five projects and the programme director.

Purpose: to provide overall leadership for the programme and to guide the overall cohesiveness of the work of the Four and Five into a final single proposal.

Assumptions:

- The CEX of each partner will hold responsibility for reporting to and approvals from their respective leaders.

Four project board

Members: CEX group, workstream theme leads, workstream leads as required and project management.
 Purpose: to provide leadership, guiding the undertaking and completion of each workstream and directing the creation of the options papers and final proposal.

Assumptions:

- Each partner will provide a workstream lead for each workstream unless agreed otherwise.
- From within each group of workstream leads a workstream theme lead will be collectively agreed by the CEX group. Some workstreams (Finance and Service Design) will have joint theme leads.
- Workstream leads also stand as the senior user for their respective area/s.
- Workstream groups are responsible for organising their own meeting schedule where they will define and deliver their outputs.
- Workstream leads will use their weekly meetings to discuss and agree their outputs with the aim of resolving any differences and presenting a collective position to the Board.
- Within each partner organisation, workstream leads are likely to need to delegate a number of workpackages to local subject matter experts. Subject matter experts will feed outputs (i.e., data and analysis) back into the programme through their leads.
- The project manager will be a permanent member of the board. Unless they are theme leads, workstream leads will attend the board as required. Subject matter experts and other guests may be invited to the board as required.

Meeting Schedules

Programme board	TBC
Project board	Weekly
Workstreams	Weekly during scoping stage then frequency may be reviewed

Assumptions:

- The different workstreams may require working groups with various configurations at different stages of the programme. This may take advantage of existing cross-organisation meetings or require additional meetings.

Programme personnel

Programme board

Partner	CEX
South Hams DC /West Devon BC	Andy Bates
Teignbridge DC	Phil Shears
Torbay Council	Anne-Marie Bond
Torridge DC	Steve Hearse
Mid Devon DC	Stephen Walford
North Devon DC	Ken Miles
East Devon DC	Tracy Hendren

'The four' Project board personnel
(Theme leads indicated in bold)

Layer	Org.	Personnel
CEX group		
	TC	Anne-Marie Bond
	SHWD	Andy Bates
	TDC	Phil Shears
Workstream leads		
Finance	TDC	Gordon Bryant
	SHWD	Lisa Buckle
	TC	Malcolm Coe
Legal & governance	SHWD	Drew Powell
	TC	Matthew Fairclough-Kay
	TDC	Paul Woodhead
Service Design	SHWD	Steve Mullineaux
	TDC	Amanda Pujol
	TC	Matthew Fairclough-Kay
Stakeholder engagement	TC	Kate Spencer
	SHWD	Neil Hawke
	TDC	Julia Hlland
Data	TDC	Tom Pearce
	TC	Jon-Paul Hedge
	SHWD	Neil Hawke
Project management		
	TC	Claire Berlyn
	SHWD	Neil Hawke

Terms of Reference

Mission statement

To work for the very best outcome in Local Government Reorganisation (LGR) for all of Devon's residents and visitors, for our businesses and public services, and for our natural environment. The members of the

Devon District and Torbay Council LRG programme will work together to share information, learning and resources to meet the Government’s ambitious timeline for LGR. We value collaboration and prioritise strong and productive working relationships both within the network and with other Devon authorities.

Remit and Conduct

We will work together to:

- Ensure that all input contributes positively to the discourse focusing solely on practical and insightful solutions
- Identify opportunities and challenges that emerge through the delivery of the LGR outputs
- Coordinate our internal and external communications around LGR
- Identify partnership opportunities with other councils to further collaborate and support each other
- Review and amend these ToRs periodically when applicable and appropriate

Member Responsibilities

- To act in the interests of our Councils and their residents
- To work together on the basis of honesty, openness and transparency
- To work together on the basis of no surprises
- To seek to achieve consensus through discussion
- To promote strong working relationships within and between member organisations
- To send apologies or appoint a substitute from your council if you are unable to attend meetings

Deliverables

The members will work together to deliver:

1. A programme plan to meet the Government timeline for the final proposal stage of LGR
2. a full appraisal of the preferred option for a Southern Devon Authority, and a full proposal for the whole area
3. Wide public and partner engagement and consultation on the option
4. A single final proposal for the whole area to be submitted to MHCLG by 28 November 2025

Governance Structure

The programme is ultimately accountable to the Leaders of the members’ respective councils. The programme will be controlled by a Programme board made up of the CEX from each member council. Beneath the programme board sits two project boards respectively delivering the Southern Devon Authority (the Four) and the Exeter & Northern Devon Authority (the Five) projects. The full governance structure is set out in the Governance Structure and Draft TOR template held by each project.

Update Log:

Version	Author	Date	Changes
V1	Claire Berlyn	30/4/25	Drafted for comment
V2		04/06/25	Approved by The Four Project Board