Draft Torbay Council's proposal for Local Government Reorganisation



November 2025



TOGETHER FOR DEVON

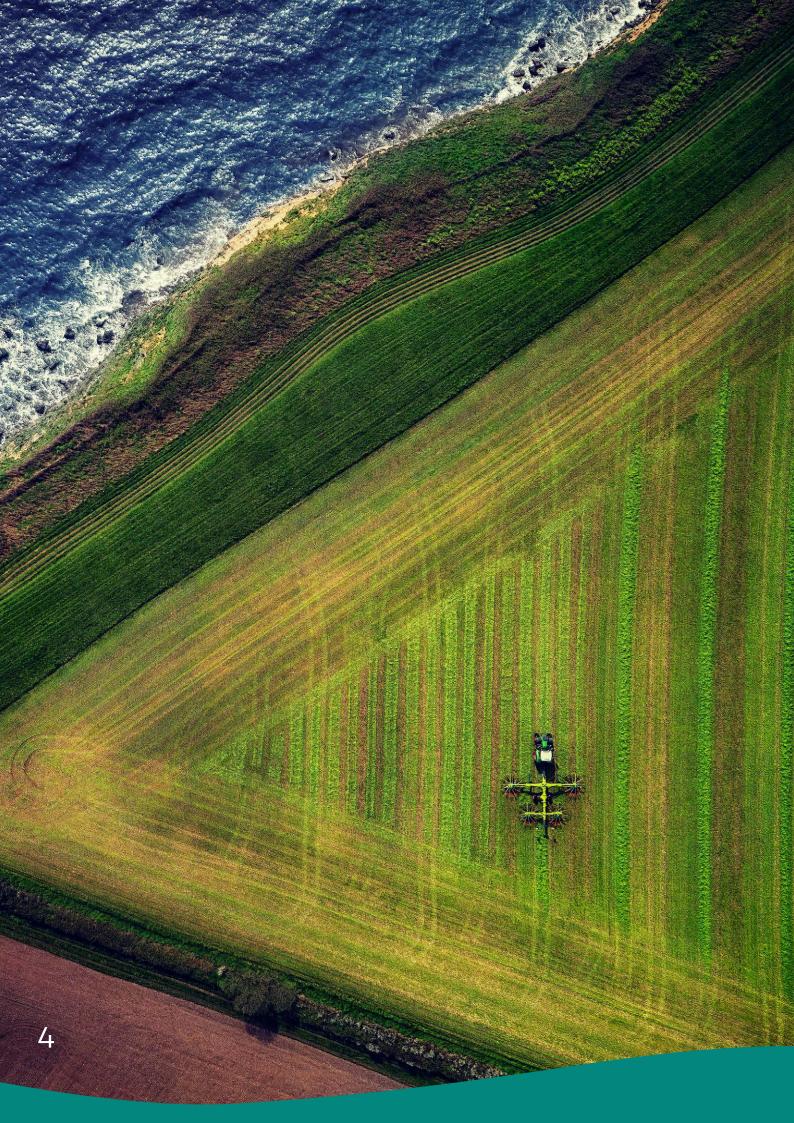
Focused on place, growing with purpose

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Foreword

From Councillor David Thomas, Leader of Torbay Council



Since the publication of the English Devolution White Paper in December 2024, Torbay Council has been a collaborative, willing partner seeking to bring together councils to work in the best interests of all of Devon's communities.

We have been clear that the voice of our residents and communities should be at the heart of developing our proposal – and again, Torbay Council has led the joined up approach to engagement across the area which means that our proposal is designed around real places and real communities.

Torbay Council has been a unitary council since 1998. Whilst we are a small – or, more accurately, an agile – unitary council, we are highly successful. Our Children's Services are rated by Ofsted as Good and our groundbreaking partnership with the NHS has been delivering positively for our residents, through joined up health and adult social care for almost 20 years.

Through careful financial management, Torbay Council is in a secure financial position. We have agreed the last five budgets with no significant changes to services. Not only that, but we have also been able to invest in our children's services, adult social care and place-based services. Our Financial Sustainability Plans are identifying and delivering innovative solutions so that we provide the best outcomes within our means.

We have a track record of working innovatively with our partners. We are taking our place on the regional and national stage whilst at the same time enabling our communities to act for themselves.

Against this backdrop, we have developed this proposal which recognises that the future configuration of local government in Devon needs to provide a fair and balanced tax base, supporting financial resilience and equitable service delivery.

We want to create an environment for place based growth which attracts investment. Torbay, Plymouth and Exeter will be empowered to lead on urban priorities, with the new Rural Devon Coast and Countryside Council focusing on the distinct needs of dispersed hamlets, villages and market towns.

Our councils will have a greater focus on the distinct identities and ambitions of our places, building on existing strengths and realising efficiencies through more tailored solutions and more responsive services.

We know that Devon is beautiful, but we also know that that is not the full story. The challenges facing our residents are complex. They have told us what they value. They have also told us that they expect us to deliver. This proposal meets their needs – in their localities.



Executive Summary

Working with partners across the area, Torbay Council's proposal for local Government reorganisation in Devon is based on four unitary councils:

- Torbay Council continuing as a unitary council on its existing boundaries
- an expanded Plymouth City Council covering the Plymouth Growth Area
- a new Exeter Council reflecting the functional housing and labour market around the city
- a new Rural Devon Coast and Countryside Council covering the remainder of Devon.

We believe that these are councils designed around real places, communities and economies, able to make decisions closer to the communities they serve. Our proposal will mean that councils are more responsive to the needs of different places – with Torbay, Plymouth and Exeter empowered to lead on urban priorities and the new Rural Devon Coast and Countryside Council focussing on the distinct needs of dispersed rural and coastal communities, market towns and villages.

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

Why four unitaries – and why Torbay must remain a unitary

Our proposal is based on sensible geographies that reflect how people live and work.

The model aligns with functional economic areas, travel to work patterns, and coherent housing markets around Plymouth, Exeter and Torbay, with a fourth council dedicated to rural, coastal and market town communities.

It avoids the pitfalls of large unitary councils which would dilute identity and service responsiveness, and provides a balance against over fragmentation.

Our four unitary solution preserves distinct urban identities, while giving rural Devon – whether in coastal or countryside communities – a single, focused advocate.

We have a clear public mandate for Torbay Council to continue on its existing boundaries.

Engagement shows strong attachment to local identity and concern about democratic distance in larger, centralised structures.

Responses to Torbay's engagement survey gave a clear majority in favour of retaining unitary status on current boundaries, with confidence in the Council's responsiveness, stability and regeneration trajectory.

Preserving Torbay's unitary status protects momentum at a critical "moment in time" for the English Riviera's regeneration and maintains accountability close to our communities.

Protecting nationally significant integrated care.

Torbay's pioneering Integrated Care Organisation – delivering joined up health and adult social care for nearly two decades – is a keystone of resilient services for an ageing population.

Boundary changes that dissolve Torbay's current status risk unpicking this model, with disruptive consequences for vulnerable residents. Retaining Torbay as a standalone unitary offers a replicable blueprint for place based adult social care elsewhere in Devon and across England and, to this end, we are supporting the Casey Commission in their considerations of the future transformation of adult social care.





Meeting the Government's criteria

Establishing a single tier of local Government

The proposal delivers a single tier of local Government across Devon.

It uses existing principal authorities as building blocks for our Base Proposal. Our Modified Proposal refines these boundaries, where there are strong services based and financial rationales and a public mandate to do so. Our Modified Proposal comprises:

■ **Torbay** - continuing as a unitary council with proven success in delivering integrated services, from children's services to innovative health partnerships and our resilient community and voluntary sector.

- Expanded Plymouth expanding to serve communities across the city and surrounding areas that already rely on Plymouth for employment, education and healthcare. A council with the scale to compete nationally and drive growth.
- **Expanded Exeter** unlocking the potential of one of Britain's fastest-growing cities, giving it the coherence and capacity to plan strategically for housing, transport and economic growth across its natural economic area.
- Rural Devon Coast and Countryside a council specifically designed for rural and coastal communities, with services tailored to the challenges of dispersed populations, market towns and isolated areas.

We believe that our proposal is based on sensible economic areas and coherent geographies for housing delivery; creating the right conditions for continued growth with local accountability.

Efficiency and capacity with the ability to withstand financial shocks

The tax base of each unitary council, and the resources available to it per head of population, are balanced, without conferring undue advantage.

Our financial modelling has been developed jointly between our Chief Financial Officers and independent advisors (including Pixel Financial Management and PeopleToo). It shows that around £58 million of organisational and service savings can be made, with transition costs of approximately £52.5 million, yielding payback in two to three years.

The savings are prudently attainable through leadership consolidation, systems rationalisation and service transformation. In particular, service efficiencies can be found through demand management, market shaping and standardised best practice in adults' and children's services.

With continuing authority status for Torbay Council and Plymouth City Council, disruption and costs are minimised in these areas. The boundary refinements for Exeter and Plymouth improve sustainability and the balance of resources.

High quality, sustainable public services

Our four authority solution enables targeted responses to distinct local needs.

The model avoids fragmentation, maintains continuity where services are strong, and enables tailored improvement where weaknesses persist. It also preserves clear accountability for performance variation, rather than masking differences within larger authorities.

It builds on the existing capacity of the established unitary councils in Torbay and Plymouth. It will maintain and improve the services for our most vulnerable. Our transformation and improvement journeys will continue but the opportunities for further integration and transformation will be maximised.

Local innovation will be at the heart of improving crucial services. Working closely with our communities we can reimagine how we operate – supporting people where they live, with services that are tailored to meet their needs.

Working together to understand and meet local needs

Our proposal is the product of sustained joint working across Devon's councils, shared data and evidence, and wide engagement with residents, anchor institutions, businesses and voluntary and community sector partners.

Ten of the eleven Devon councils used a shared survey framework and the four unitary solution responds directly to what people said they value:

- decisions made locally
- accessible councillors and services
- protection of distinct identities.

Our proposal retains the distinct urban profiles of Torbay and Plymouth and elevates

Exeter to reflect its growing strategic role. The new Rural Devon Coast and Countryside Council ensures that rural priorities are not overshadowed by urban agendas.

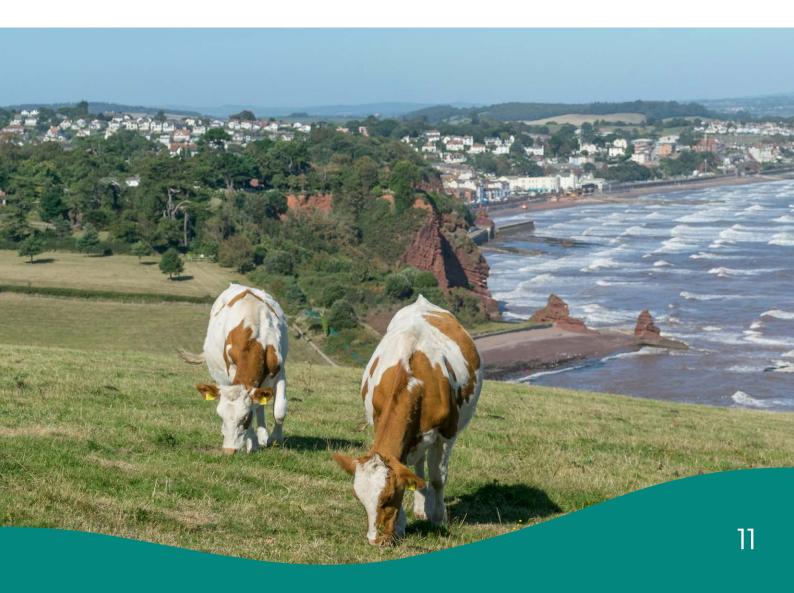
Supporting devolution arrangements

Our proposal provides the building blocks for the establishment of a South West Peninsula Mayoral Strategic Authority – with the four unitary solution providing sensible population ratios, ensuring equal partners in size as well as in name.

It establishes equal status and coherent membership for a Mayoral Strategic Authority, enabling greater powers and investment in transport, skills, housing, and growth. This supports defence and marine autonomy in Plymouth, science and data initiatives in Exeter, coastal renewal in Torbay, and rural productivity as well as net zero efforts across the County.

Building on the work already in progress with the Devon and Torbay Combined County Authority, further devolution will enable Devon to:

- maximise the potential of our exceptional environmental assets and internationally significant research capacity,
- support the vital national security role of Devonport dockyard,
- address our specific housing pressures with a strategic approach to housing, affordability and availability,





- create an integrated transport network that connects rural and coastal communities with our urban centres and beyond, and
- develop coordinated skills provision that meets the needs of our key growth sectors and addresses productivity challenges.

Stronger community engagement and neighbourhood empowerment

Each unitary will deploy locality based service models and neighbourhood governance suited to its context. These will leverage Torbay's Community Partnerships, the strong parish networks across rural Devon, and urban forum models for Plymouth and Exeter. This is a better democratic settlement than oversized entities that push decision making further away from residents.

Using the pillars of:

- Tackling local challenges
- Developing locally owned solutions
- Evidence- and insight-led practice, we will create local solutions which focus on prevention, encouraging local action which strengthens neighbourhoods. We will better understand the needs in local communities so we can target support and collaborate at the right scale.

Similarly, proposed councillor numbers in each authority reflect the needs of each authority and the communities they represent, not least the parishes and wards which will form an expanded Plymouth City Council and an expanded Exeter Council.

A future built for every community

Devon stands at a transformative crossroads.

We are proposing a bold new model: four unitary councils designed around how people actually live, work, and access services. This isn't change for its own sake - it's a strategic shift toward clearer accountability, integrated services, and almost £500 million in reinvestment across the County.

The proposal reflects Devon's diversity: thriving urban centres, resilient coastal towns, and vast rural communities. It empowers each area – Torbay, expanded Plymouth, expanded Exeter, and Rural Devon Coast and Countryside - with tailored governance, financial sustainability, and the capacity to deliver modern, people-centred services. Families will no longer navigate fragmented systems; businesses will benefit from coherent planning; and young people will have opportunities close to home.

This is about more than structure. It's about culture: removing barriers, fostering collaboration, and building councils that serve people, not bureaucracy. With strong local voices, strategic capacity, and readiness for further devolution, Devon can lead nationally while staying rooted in community.

This isn't just Torbay's moment in time – it's Devon's moment to shape a future that works for everyone. Four councils working together for Devon. Focused on place, growing with purpose.





Introduction

Our proposal sets out a new vision for a single tier of local Government in Devon – with unitary councils across Devon that focus on their place and which can grow with purpose to create a better Devon for everyone.

It builds on what works well today and looks forward to what will be needed in the future to best protect, support and enhance communities and our built and natural environments.

Together with the shared aspiration for a new Mayoral Strategic Authority for Devon, this proposal lays the foundations for giving the people of Devon much greater control over the outcomes that matter to them most.

Structure of our proposal

Our proposal is divided into three parts:

Part 1 describes the future of local Government in Devon; why we need to reorganise local Government, the challenges and opportunities our County faces and what we believe to be the optimal unitary solution for Devon's future.

This includes a detailed options appraisal that sets out the strengths, weaknesses and financial feasibility of each viable unitary model against the Government's criteria for local Government reorganisation. It provides an overview of our base and modified proposals in compliance with the requirements of the Local Government and Public Involvement in Health Act 2007. Further it establishes why we are proposing a four unitary solution for Devon.

Part 2 sets out our case for change

providing an in depth assessment of the preferred option against each of the Government's six criteria within their invitation letter.

Part 3 provides a high level implementation plan together with our asks of Government to support successful implementation.

Accompanying our proposal is a separate appendix which includes the evaluation of our resident and stakeholder engagement, as well as our detailed financial analysis and assumptions.

Development of our proposal

Our proposal has been developed through joint working, meaningful dialogue and insight building. Throughout its development we have prioritised open collaboration and evidence; and ensured our direction is informed by the perspectives of local people and partners.

Open collaboration and evidence

Local Government reorganisation is already a force for change. It has brought all of Devon's authorities into closer communication, creating brilliant opportunities for ongoing cooperation and paving the way for further shared services and joint commissioning. Torbay Council has been an active and solution focused partner in discussions with Plymouth City Council as a fellow existing unitary authority as well as with the County Council and the Districts and Boroughs, including Exeter City Council.

We led on putting in place an information sharing agreement between Devon's 11 councils and, jointly with Plymouth City Council, on establishing a shared data repository housed at Plymouth City Council. Data collected from across Torbay Council's directorates has been made openly available to all.

We have researched best practice around local Government reorganisation by studying proposals developed in other areas in previous rounds of LGR as well as the recent proposals that have been prepared in the Devolution Priority Programme areas.

We developed a methodology for our options appraisal that combines

qualitative and quantitative assessment, and rigorously tested our insights through repeated evaluation and scoring exercises with councillors and senior officers.

We sought the right external support and contributed to work commissioned by others. We commissioned PeopleToo to provide a check and challenge on our key assumptions around children's and adults' services. Devon's chief financial officers have worked closely together and alongside Pixel Financial Management to gather and develop financial insights. We benefited from the expertise of Newton Consulting, KPMG and Newtrality by fully participating in workshops, meetings and output development enabled by the County Council, the District and Boroughs and Exeter and Plymouth City Councils.

From the outset we have placed a premium on being a sensible broker and mature partner, sharing resources, seeking agreement and leading with openness and respect.

Led by the views of our communities and partners

Collaboration has also been at the heart of our engagement with our communities and stakeholders. Torbay Council has worked with its district and borough colleagues to coordinate engagement activity, share feedback and best practice, and deliver consistent messaging. Surveys, engagement events and briefings have taken place across Devon and Torbay.

Alongside that, Plymouth City Council undertook its "Big Community Consultation" on its proposals for LGR. This included facilitated consultation events across Plymouth and South Hams as well as two

surveys.

Further, Exeter City Council hosted an online survey as well as an enhanced representative survey for the residents in the rural and coastal wards within their proposed area (conducted by external market researchers).

The existing unitary councils and the district and borough councils all ran wide-ranging information sharing and awareness raising campaigns, to encourage as broad a response as possible to the engagement.

With ten out of the eleven councils across Devon sharing the broad basis of an engagement questionnaire, we have based our proposal on what our communities have told us matters most about their places and local Government.

Key themes from the surveys include:

- Residents expressed a strong emotional and cultural connection to their local areas, emphasising the importance of preserving distinct community identities.
- There was widespread concern that larger, centralised councils would be disconnected from local needs and diminish local representation.
- Respondents overwhelmingly supported governance models that enable decisions to be made locally, with councillors and services accessible within their communities.
- There was a desire to respect and maintain the rural and coastal character of towns and villages, with many expressing fears that being absorbed into larger authorities would lead to

a loss of identity and neglect of local priorities.

Specifically, from Torbay Council's engagement survey¹, there is support for Torbay Council remaining as a continuing unitary authority on its existing boundaries with 64% of respondents in favour of this option.

People have confidence in Torbay Council. Among those who feel Torbay should remain as a continuing unitary authority, the Council is seen as:

- functioning well,
- financially stable,
- responsive, and
- delivering regeneration to the area.

People felt that Torbay Council was already delivering well against the Government's LGR criteria.

Throughout the development of our proposal, we have actively engaged with our partners across Devon. We have sought to understand the strengths and weaknesses of the options under consideration, the challenges and outcomes our partners would wish to see, and how we can better align all of our strategic priorities to deliver together for our communities.

Full details of how we have worked together to understand and meet local needs (Government's Criteria 4) is set out in our case for change.

¹ Our engagement survey ran from 1 July to 2 September 2025 and received 1430 responses. The full engagement report is available in Appendix 1

PART ONE

The future of local Government in Devon

In this section we explain the challenges and opportunities faced by Devon and describe the strengths, weaknesses and financial feasibility of the options for local Government reorganisation which we have considered.

We then set out the outline case for our proposed four unitary solution for the future of local Government in Devon.



PART ONE

Devon - the people and the place

Our ambitions

The County of Devon is a unique place to live and work – where people feel a sense of connection to their environment and their communities.

As a large geographic area, Devon is made up of dispersed populations with three major urban areas – the two cities of Plymouth and Exeter and the conurbation of Torbay (the second largest south west of Bristol).

Two National Parks and two stunning coastlines set the tone for our environment and, as a result, we're a magnet for tourists. We have good schools across the County and fantastic universities and further education colleges.

Our outstanding environment has shaped the development of our business base with our blue and green infrastructure significantly contributing to the visitor economy. It has also created substantial opportunities in industries such as fishing and agriculture, maritime, defence, and energy. The area is typified by a sense of enterprise, innovation and ambition – with sectors such as advanced manufacturing and engineering, electronics and photonics, and health and pharmaceutical manufacture having the potential for significant growth.

Across Devon, however, there are major challenges such as an ageing population

placing huge pressure on public services, significant pockets of deprivation, skills gaps, low wages, and the migration of young people out of the area - demonstrating a need to create more opportunities for them to stay and thrive.

Collectively, the ambitions which we have for Devon to grow with purpose while sustaining our distinct places are summarised as:

Safe, healthy and thriving communities

We want all residents, including children and young people, to feel and be safe, live well, and thrive in happy, healthy and resilient communities.

Quality homes for all

We want to increase the availability of good quality, affordable and permanent housing that meets local needs, including for vulnerable and care experienced individuals.

Inclusive and sustainable economic growth

We want to create the conditions for a strong, sustainable economy that supports diverse industries, attracts investment and offers good employment and learning opportunities for all.

A connected and prosperous region

We want infrastructure and connectivity that ensures our residents, businesses and visitors can reliably access learning, work and leisure opportunities.

Environmental stewardship

We want to protect and enhance our natural environment, whilst responding to the climate emergency and working towards a net zero carbon future.

Fairness, opportunity and wellbeing

We want to tackle poverty and inequality and support health and wellbeing across all our communities.

As existing unitary authorities, Plymouth City Council and Torbay Council have

both demonstrated how services, such as housing, community safety and leisure, can work much more closely with children's services and adult social care to provide proactive early intervention delivering better outcomes for local people. The subsequent reduction in long-term demand means that services are more effective, efficient and sustainable.

Unitary local Government across the whole of Devon will mean that the rest of the population can benefit from these advantages. Reorganisation is an opportunity to reshape services across Devon so that we can deliver our shared ambitions for our communities.



Devon's population

Situated on the south west peninsula of England, Devon covers an area of 6,709 km² or 2,591 sqare miles. The 2024 population is 1,254,506 people with 530,181 households (2021 Census).

Key facts about Devon's population

Population
2024
Projected population by 20431,397,029
Largest local authority
by population
Plymouth 272,067
Smallest local authority
by population
West Devon
Devon's population density against
the South West and England
Devon 187 residents per km²
South West 247 residents per km²
England 449 residents per km²
Largest populations by age
Largest populations by age Aged 55 to 59
Aged 55 to 5989,920

Birth rate

22% decline between 2015 (11,635) and 2024 (9,099).

Life expectancy at birth

(data for the period 2021-2023)

Male	 		 						 	80.0
Female	 		 						 	84.0

Highest verses lowest life expectancy by district

(data for the period 2021-23)

Male

Lowest: Torbay	.78.3 years
Highest: South Hams	. 82.1 years
Female	
Lowest: Plymouth	.82.4 years
Highest: South Hams	.85.9 years

Leading causes of mortality for under 75s

(data for the period 2019 - 2023)

Cancer39%
Cardiovascular disease22%
Respiratory disease8%

² Sources: ONS Mid-year population estimates and subnational population projections, ONS Geoportal Statistics, NOMIS, OHID Fingertips, Primary Care Mortality Database

Census predictions from 2022 estimate that Devon's population will grow to 1,397,029 by 2043, an 11% increase from 2024 population figures. These predictions suggest the older population will increase substantially, particularly in relation to those aged 80 years and over whose numbers are projected to increase by 80%. Conversely, the number of those aged under 20 are projected to fall by 9%.

Migration into Devon from other areas of the UK also remains higher than migration out. It contributed approximately 25,000 people to population growth over the last 3 years. A further factor in growth will be a requirement for Devon to increase new homebuilding under National Planning Policy Framework reforms. Under the previous methodology Devon was targeted to deliver 6,001 new homes per year. In December 2024, under the revised standard method, targets rose to 7,950 new dwellings and are expected to continue to trend upwards under the model of twice yearly revisions.

In recent years, Devon's birth rate has declined by 22% from 11,635 births in 2015 to 9,099 in 2024. This means the proportion of people living in Devon in older age groups will rise, with increased likelihood of impacts on health and care services due to increased prevalence of long term health conditions.

Within Devon's population, people aged 55 to 59 and 60 to 64 years old are the two largest five year cohorts by age. The population profile is significantly different to England with higher proportions in all age groups from 55 to 59 years and older, a much

smaller proportion of 25 to 49 year olds and those aged 14 years and younger. Nearly one in four residents are aged 65 and over, with the highest proportion of older people living in East Devon and the least in Exeter.

There is very high demand for children's services in Plymouth and Torbay. In 2024, there were 121 children looked after per 10,000 children in Torbay and 99 per 10,000 in Plymouth. Demand in the Devon County Council area is lower (59 per 10,000 children) but still towards the upper end of the England average (70 per 10,000). Similarly, across all three upper tier authorities there is high demand for services to support children and young people with Special Educational Needs and/or Disabilities (SEND).

Around 4.2% of people in Devon are from a minority ethnic group that is not white. 1.6% of the population reported their ethnicity as Asian. Around 1.5% of the population reported as mixed ethnicity and 0.5% reported their ethnicity as Black, 0.6% reported their ethnic group as 'Other'. There is also a lower rate of Gypsy or Irish Travellers at 0.8 per 1,000 residents in Devon compared to England.

Historically, there has been a trend of rising life expectancy at birth for males and females across Devon, mirroring the rest of the country. For example, children born between 2021 and 2023 are expected to live longer than children born between 2001 and 2003. However, data collected over the last decade shows life expectancy has been broadly static during this period across Devon, the South West and England.



Devon as a place to live, learn and work

Devon, including Plymouth and Torbay, benefits from a broad and varied economic geography. Exeter is home to a knowledge led and high value economy; the towns of Torbay combine high value digital technologies with traditional strengths across the visitor economy and healthcare; and Plymouth's marine and defence economy is central to its economic identity.

The area brings together a range of nationally significant businesses and assets from the Met Office in Exeter to supporting the UK's Continuous at Sea Deterrent at Devonport in Plymouth. As home to around 30% of the UK's dairy industry and England's largest fishing port by value of catch in Brixham, the County

is famous as an agricultural and food production hub and is important for the food security of the nation.

We benefit from two world class universities and four nationally significant further education colleges which provide research and training excellence. The area is famous for its broader rural and coastal geography, with much of our population living within the stunning Devon landscape which incorporates the two National Parks of Dartmoor and Exmoor, three UNESCO designations and five National Landscapes.

With a GVA of over £33 billion per annum (2023), Devon offers enormous potential.

Together for Devon: focused on place, growing with purpose

It has over 40,000 businesses providing around 500,000 jobs. It is a coherent economic area and has significant sectors with potential for growth, including advanced manufacturing and engineering, environmental technologies, data and clean industries; digital technology; health and pharmaceutical manufacture and wider defence industries, as well as traditional strengths in areas such as tourism and agritech and food production.

But Devon faces challenges which impact on productivity levels as well as the ability for all our residents to have a good quality of life. Rural, urban and the coastal areas of Devon suffer from nationally significant levels of poverty, with parts of Torridge and Northern Devon amongst the bottom 5% worst affected areas of England, and West Devon and Torbay having among the lowest workplace based wages of any authority in the country.

Around 40% of all young people leave the area due to a lack of available housing or to pursue education or employment opportunities. For young people remaining in the area our ambition for inclusive and sustainable economic growth addresses significant challenges with skills and educational performance. There are pockets of nationally significant educational need and parts of Devon have amongst the lowest Level 4 achievement rates in the country.



Innovative solutions to meet the challenges

Continuous improvement is at the heart of local Government with innovative solutions required to achieve the ambition we have for our communities.

As we have appraised options and developed proposals, consideration has been given to the increasing demand for high cost services, the funding of local Government and the approach that councils across Devon are taking to these competing challenges.

The funding of local Government remains highly uncertain and insufficient to address increasing demand for vital services. The expected review of the funding formula for local Government and the reintroduction of multi year settlements is highly awaited. Weighting the formula more towards deprivation means consideration needs to be given to ensure that less deprived areas do not mask the pockets of deep deprivation across Devon.

With early intervention and prevention at the heart of our local services, local Government reorganisation will bring together services to ensure people can live well and independently within their communities. The Torbay Community Helpline, which acts in combination with statutory services at the front door of adult social care support, shows how successfully co-designing localised solutions can have a positive impact of people's lives, whilst reducing the demand for statutory services.

Focusing on the localised needs of different areas and using their assets to best advantage provides solutions which provide value for money and can be scaled across the area and the region. Torbay's innovative Hotels to Homes programme focuses on turning empty hotels into affordable

housing for local key workers and those with highest housing need. Alongside creating new affordable housing, Torbay's Housing Options team are working to prevent homelessness through joined up working with children's social care, education and youth services; showing that preventative support can lead to lasting change.

Working with businesses and education settings is critical to inspiring our children and young people, as well as supporting economically inactive residents back into work. Collaborative working and cross referral is key to success. For example, through Build Torbay, the construction sector is developing engaging materials for schools to raise awareness of career opportunities, including the Minecraft challenge for primary pupils and practical solutions for disadvantaged secondary learners as well as initiatives such as Foundations for Work to support the economically inactive. The Sound Futures programme uses creative digital media, music, and radio to inspire and support young people currently not in education, employment or training, helping dozens transition into education including university, training, and employment.

Designing and delivering solutions that focus on prevention, early intervention and innovation is vital and lessons learnt in the existing unitary councils of Plymouth and Torbay will be hugely beneficial. Taken with the changes underway within the NHS this is a time of huge change for our communities. Our focus will always remain on our residents, businesses and communities having the best outcomes.



PART ONE

Options appraisal

In this section we set out our options appraisal for Local Government Reorganisation in Devon, assessing the strengths and weaknesses of five credible unitary solutions for Devon. The options we have considered have been developed and tested within Torbay Council and with our partners.

Our recommended option is a four unitary solution for Devon described in Option 3.1:

Torbay Council would continue as a unitary council on its existing boundaries.

Plymouth City Council would continue as a unitary council on expanded boundaries.

A new Exeter Council would be formed to serve an expanded Exeter area.

The creation of a new Rural Devon Coast and Countryside Council.

We conclude this is the best option for Devon to meet the Government's criteria.



Figure 1. Option 3.1: Torbay Council's preferred four unitary solution for single tier local Government in Devon

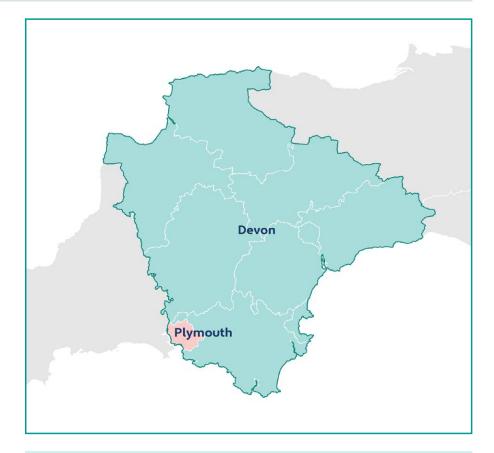
The options

Based on the Government's criteria, subsequent guidance, the dynamics of collaborative working across Devon councils to meet the Government's robust outcomes, and the current makeup of local Government in Devon, the following options have been appraised.

Option 1: Two unitary councils (Devon and Plymouth)

Plymouth City Council would continue as a unitary council.

The rest of Devon, including Torbay, would be served by a new Devon unitary council.



Plymouth UC population: 270,000 (22%)3

Devon UC population: 980,000 (78%)

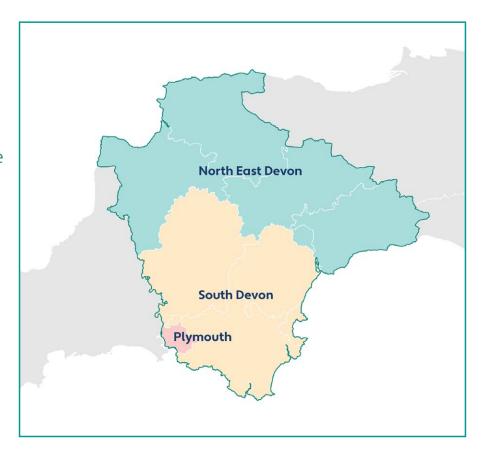
⁴ All population figures are estimations based on the 2021 census...

Option 2.1: Three unitary councils (the 4-5-1 model)

Plymouth City Council would continue as a unitary council.

The areas of Torbay, South Hams, West Devon and Teignbridge would be served by a new South Devon unitary council.

The areas of Exeter,
Torridge, Mid Devon,
North Devon and
East Devon would be
served by a new North
East Devon unitary
council.



Plymouth UC population: 270,000 (22%)

South Devon UC population: 430,000 (34%)

North East Devon UC population: 550,000 (44%)

Option 2.2: Three unitary councils (Devon, Plymouth and Torbay)

Torbay Council and Plymouth City Council would continue as unitary councils.

The rest of Devon would be served by a new Devon unitary council.



Plymouth UC population: 270,000 (22%)

Torbay UC population: 140,000 (11%)

Devon UC population: 840,000 (67%)

Option 3: Four unitary councils

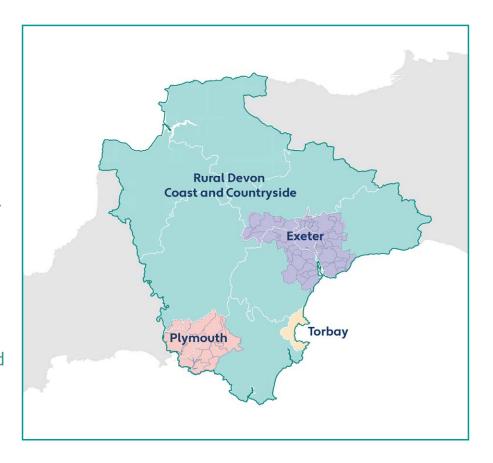
Option 3.1: Torbay, expanded Plymouth expanded Exeter and Rural Devon Coast and Countryside Councils.

Torbay Council would continue as a unitary council on its existing boundaries.

Plymouth City Council would continue as a unitary council on expanded boundaries.

A new Exeter Council would be formed to serve an expanded Exeter area.

The creation of a new Rural Devon Coast and Countryside Council.



Plymouth UC population: 300,000 (24%)

Torbay UC population: 140,000 (11%)

Exeter UC population: 260,000 (21%)

Devon UC population: 550,000 (43%)

Option 3.2 Expanded Torbay, Plymouth and Exeter Councils and Rural Devon Coast and Countryside Council

Torbay Council and Plymouth City Council would continue as unitary councils on expanded boundaries.

A new Exeter Council would be formed to serve an expanded Exeter area.

The rest of Devon would be served by a new Rural Devon Coast and Countryside Council.



Plymouth UC population: 300,000 (24%)

Torbay UC population: 220,000 (18%)

Exeter UC population: 260,000 (21%)

Devon UC population: 470,000 (37%)

Discounted option

Within our Interim Plan stage, we discounted a single unitary council option.

With a population in excess of 1.25 million people distributed across 6,709 km², the geographic County of Devon (including Plymouth and Torbay) is the fourth largest by area in England.

In considering LGR options, changes to structures and service delivery arrangements need to achieve the right balance of population size and economies of scale with the practicalities of the geography, culture, society and economy of Devon. Change should also reflect and enhance the communities that have developed under present boundaries whilst optimising efficiencies in service delivery.

Nationally, experience points to the fact that Devon is far too large to enable a single authority to be efficient and effective whilst retaining a sense of place and community.

Therefore, we have continued to discount this option.

Our approach

Principles

The options presented here were reached through extensive engagement and discussion with all of Devon's councils as well as in discussion with members and senior officers of Torbay Council. From the various configurations of unitary local Government in Devon that have been explored, these are the options we believe are the most viable for Devon's communities.

Alongside the Government's six LGR criteria and other guidance provided over the last year, we adopted three overarching principles to help guide our approach:

- 1. Any option should be in the best interests of all of Devon's communities, including maximising the benefits of the existing unitary councils in Devon.
- 2. Options that have the potential to align with the footprints of other public sector partners would be preferred.
- 3. No new council should be set up to fail. Across any new unitary configuration financial resilience and sustainability, service level demand and economic prospects should have relative equity and parity from day one.

Criteria

Each option was then assessed against the Government's criteria and sub-criteria for LGR which we summarised as:

Criteria 1: Establishing a single tier of local Government

Proposals should:

- create a single tier of local Government across the area
- be based on sensible geography and economic viability
- be supported by robust evidence and expected outcomes.

Criteria 2: Efficiency, capacity and withstanding financial shocks

New councils should:

- improve efficiency and resilience
- be the right size to improve financial stability
- show how transition costs and existing council debt will be managed.

Criteria 3: High quality and sustainable public services

Proposals should show how reorganisation will:

- enhance public service delivery
- avoid fragmentation
- improve outcomes in key areas like social care, children's services, and public safety.

Criteria 4: Working together to understand and meet local needs

Proposals must show how councils have meaningfully collaborated and engaged. They will:

reflect community identity

show how we have addressed public concerns.

Criteria 5: Supporting devolution arrangements

Proposals should:

- enable devolution
- give details of how governance structures will adapt to support strategic authorities.

Criteria 6: Stronger community engagement and neighbourhood empowerment

Building on existing arrangements, proposals will include:

- strong community involvement
- neighbourhood empowerment.

Scoring

We scored each option against each of the six criteria using the following scale:

Low

the option meets very few or none of the criterion's requirements.

Medium

the option meets some of the requirements of the criterion.

High

the option meets most or all of the requirements of the criterion.

The Government's criteria is unweighted so no weighting was applied to our scores.

Method

Our appraisal has included a financial and qualitative assessment.

Criterion 1 and 2 have been scored through a financial appraisal based on the indicators set out below:

Establishing a single tier of local Government

Population

- Projected population growth to 2040
- Council Tax band D average
- Council Tax band D maximum
- Council Tax base
- Council Tax base per unit of population
- Council Tax income per unit of population
- Business rates per unit of population.

2. Efficiency, capacity and withstanding financial shocks

- Grant funding per unit of population
- Non-earmarked reserves
- Non-earmarked reserves per unit of population
- Ratio of financing costs to net revenue
- Total funding/resources 26/7 per head
- Estimated savings from people services (Newton model)⁴
- Comparative ranking of likely set up costs.

In each financial assessment, we have highlighted areas of particular concern or strengths with a RAG rating and then provided each option with an overall score based on assessment against the Government criteria.

Most assessments have been made by reviewing relevant figures for each potential unitary council and considering the range and imbalance between them. The evaluation of transition costs was based on Torbay Council's Chief Financial Officer's assessment of likely transition costs considering the scale of the change that would be required to set up each council within each option.

In conjunction with the financial appraisal, qualitative evaluations were completed iteratively in workshops and engagement sessions held with members and our Senior Leadership Team. In these sessions consideration was given to insights emerging from residents and stakeholder engagement and geographic, demographic and service level data.

⁴ The Newton model has been used to estimate potential savings relating to people services for each of the options. This utilised the interactive model commissioned and published by the County Council Network in 2025. The model considers both placement costs and staffing costs.

Options summary scores

The table below presents the summary scores of the options appraisal supporting our preferred option of a four unitary solution (option 3.1) with Torbay Council continuing on its existing boundaries, the continuing council of Plymouth City Council on expanded boundaries, and the new Exeter and Rural Devon Coast and Countryside unitary councils on their proposed boundaries.

In the remainder of this section, we present the data and insights behind these scores.

	Two unitary councils	Three unitar	ry councils	Four unitary councils					
Government criteria	Option 1 Plymouth and Devon	Option 2.1 Plymouth, South Devon and North East Devon (5-4-1 model)	Option 2.2 Torbay, Plymouth and Devon	Option 3.1 Torbay, Expanded Plymouth, Exeter and Devon	Option 3.2 Expanded Torbay and Plymouth, Exeter and Devon				
1. Single tier local Government	Low	Medium	Low	High	High				
2. Efficiency and capacity	Low	High	Medium	High	High				
3. High quality public services	Low	High	High	High	High				
4. Understanding local needs	Low	Medium	Medium	High	High				
5. Supporting devolution	Low	High	Medium	High	High				
6 .Community empowerment	Low	Medium	Medium	High	Medium				

Table 1. Options Summary Scores

Full appraisal of the options

Option 1: Two unitary councils (Devon and Plymouth)

1. Establishing a single tier of local Government

Score: low



	Devon	Plymouth	Range
Population	980,000	270,000	-
Projected population growth to 2040	113%	104%	-
Council Tax band D average	£2,398	£2,325	-
Council Tax band D maximum	£2,471	£2,325	-
Council Tax base	368,699	76,557	-
Council Tax base per unit of population	2.66	3.55	0.89
Council Tax income per unit of population	£770	£580	-190
Business rates per unit of population	£203	£245	42

Financial assessment

Strengths

The model shows a good balance across unitaries for some of the metrics around council tax and business rates with lower variances for the rates per head of population.

Weaknesses

There is imbalance across unitaries when looking at population and tax base sizes and concerns about the overall size of the Devon unitary.

Qualitative appraisal

Strengths

Provides more land for economic growth and housing within the new Devon unitary council.

Any potential expansion of Plymouth City Council is based on the Plymouth Growth Area and aligns well with its distinct Travel to Work Area.

Weaknesses

Without an expansion of Plymouth City Council's boundary, the natural growth potential for Plymouth City Council would be limited.

There could be competing resource allocation priorities between the coastal, rural and urban areas of a new Devon unitary council.

Extreme imbalance in geographic size (Plymouth at 80 km² and Devon at 6,627 km²) with the new Devon unitary council being much larger than housing market and travel to work areas.

The very large population of a new Devon unitary council (approx. 1 million people) could obscure distinct needs, in particular combining Torbay's urban deprivation with the rural service frailty of the rest of Devon.

The geographic scale of a new Devon unitary council creates risks with a lack of connectivity across the area, and risks diluting visibility of Torbay's distinct high-demand/low-cost profile for services.

2. Efficiency, capacity and withstanding financial shocks

Score: low

	Devon	Plymouth	Range
Grant funding per unit of population	£305	£452	146
Non-earmarked reserves	£27,960,000	£-60,138,000	-88,098,000
Non-earmarked reserves per unit of population	£28	£-221	-249.50
Ratio of financing costs to net revenue	5%	8%	3%
Total funding/resources 26/7 per head	£1,530.53	£1,260.82	269.71
Estimated savings from people services	£43.	67m	-
Comparative ranking of likely set up costs	neutral	positive	neutral

Financial assessment

Strengths

The Newton model suggests a high level of potential savings is possible. The option provides the best balance of financing costs to net revenue budget.

Weaknesses

It shows the largest imbalance in reserves and funding per head, placing continuing challenges on the viability of Plymouth, without any expansion. Transition costs are expected to be reasonably high due to changes across Devon and to Torbay as an existing unitary, but helped by no change in Plymouth.

Qualitative appraisal

Strengths

Could deliver economies of scale and financial efficiencies in service delivery across a large area and through a significant reduction in administrative duplication and cost.

Weaknesses

The populations of the two authorities would not be equal, with the size of the new Devon unitary council well above the Government's guiding principle of a population of 500,000 or more.

The new Devon unitary council may be too large and lose some of the efficiencies available from more local working.

There could be false economies, with costs within the new Devon unitary council likely to harmonise upwards towards Devon averages, eroding Torbay's lower long term care costs.

Fragile local care markets in Torbay and South Devon could be obscured, with centralised commissioning frameworks likely to inflate costs and reduce responsiveness.

The creation of a new Devon unitary council could blur financial clarity by merging areas with very different income and deprivation profiles and financial challenges.

Theoretical financial sustainability and resilience, but experience from elsewhere, for example Somerset Council and Birmingham City Council, shows that larger councils are not as efficient as smaller authorities.

3. High quality public services

Score: low

Strengths

Existing Devon children's services and adult social care would not need to be disaggregated enabling a focus on improving children's services and services for children and young people with SEND.

Opportunity to help shape the market for children's services and adult social care in a wider geography.

Weaknesses

Increased difficulties in trying to manage and improve complex systems such as children's services and adult social care across a large geography, with a "one size fits all" approach failing to address divergent challenges, with increased costs indicated.

Children's services and adult social care within Torbay would need to be aggregated into the new Devon unitary council with the risk that current Good services are negatively impacted.

Whilst administratively simpler, the creation of new Devon unitary council risks masking Torbay's improvements and compounding Devon's current financial and performance led challenges, blurring distinct profiles into averages (especially in relation to children's services, adult social care and SEND).

The creation of a new Devon unitary council could weaken the strategic focus on deprivation and increase the risk of under resourcing high need urban populations.

Difficult to undertake effective coproduction across a bigger geographic area, making it more challenging to have really good service design. Extreme differences in population density (Plymouth: 3,366 people/km² vs Greater Devon: 147 people/km² may lead to service delivery challenges).

The creation of a Devon unitary council would likely result in the end of the groundbreaking Integrated Care Organisation which currently delivers joined up health and social care to the residents of Torbay, including the community support model which supports residents without the need for statutory services.

The impact of combining authorities with and without Housing Revenue Accounts into a new Devon unitary council would need to be considered carefully.

4. Understanding local needs

Score: low

Strengths

A new Devon unitary council would blend urban, rural and coastal communities which could reflect the pan-Devon sense of belonging.

A new Devon unitary council would closely mirror the footprint of many county level public services (such as Devon and Cornwall Police, Devon and Somerset Fire and Rescue Service and NHS Devon Integrated Care Board).

Plymouth retains its strong urban identity.

Plymouth's standalone status aligns with existing arrangements in health and policing, as well as its distinct Travel to Work Area.

Weaknesses

Combining Torbay (with its existing unitary council) with rural districts may create tensions in prioritisation.

A large unitary council would average out local need, reducing alignment between service models and community demand, and risks weaker integration with health and community safety.

A new Devon unitary council does not fit well with people's local sense of identity and their connection to their local town and community.

Devon wide unitary includes multiple travel to work areas, which may dilute alignment with specific commuting patterns.

There would be a loss, or dilution, of local tourism identities including the English Riviera, Jurassic Coast, North Devon's Adventure Coast and Dartmoor.

Difficult to have a strong, coherent Voluntary, Community and Social Enterprise sector (VCSE) across a large geography, which is vital for supporting preventative work within communities.

5. Supporting devolution

Score: low

Strengths

There is the potential for a two unitary solution to enable a Strategic Authority across the County footprint.

Weaknesses

The Devon and Torbay Combined County Authority would cease to exist.

The new Devon unitary council would need to articulate the exceptional circumstances by which the Secretary of State would use their power to designate the Council as a Foundation Strategic Authority.

If the new Devon unitary council is designated a Foundation Strategic Authority, it will not have access to the full range of devolved powers and funding as a Mayoral Strategic Authority (MSA).

If Plymouth City Council's boundaries are extended, there would be democratic disenfranchisement for those parts of the current South Hams District Council which would no longer be covered by the devolved powers the Foundation Strategic Authority.

Alternatively, the new Devon unitary council and Plymouth City Council could work together to create a Strategic Authority, however there would be an unequal population size ratio between the two authorities.

The difference in size between the two unitaries could raise concern about equity of representation and strategic influence within any future Strategic Authority.

In this scenario, if Plymouth City Council did not wish to work with the new Devon unitary council to create a Combined Authority, Plymouth City Council would become a "devolution island".

6. Community empowerment

Score: low

Strengths

Potential for greater financial capacity to invest in community engagement.

Neighbourhood committees would be essential within the new Devon unitary council, but may lack proximity to communities.

Plymouth City Council has existing voluntary and community sector partnerships, but would need neighbourhood forums to represent local voice.

Weaknesses

Potential for democratic deficit in the new Devon unitary council due to large geographic spread, with the potential of struggling to maintain meaningful local engagement due to scale.

Communities in Exeter, Paignton and Torquay are not currently served by parish councils which could lead to disparity of representation and services across a new Devon unitary council.

More difficult for communities to have access to their local councillors and the democratic process in a new Devon unitary council due to poor connectivity in a large geographic area.

The new Devon unitary council would be further away from communities and would need to mitigate this through effective neighbourhood governance.

Complexity and scale risk weakening neighbourhood empowerment and accountability.

Option 2.1: Three unitary councils (The 4-5-1 model)

1. Establishing a single tier of local Government

Score: medium



	Plymouth	South Devon	North East Devon	Range
Population	270,000	430,000	550,000	-
Projected population growth to 2040	104%	111%	115%	-
Council Tax band D average	£2,359	£2,400	£2,396	-
Council Tax band D maximum	£2,392	£2,471	£2,433	-
Council Tax base	82,499	162,440	200,317	-
Council Tax base per unit of population	3.30	2.65	2.76	0.65
Council Tax income per unit of population	£599	£822	£772	223
Business rates per unit of population	£243	£218	£191	52

Financial assessment

Strengths

The model provides the least disparity around population which helps to provide a good balance across the unitaries for some of the metrics around council tax and business rates with lower variances for the rates per head of population.

Weaknesses

Estimates of 2040 population suggests the very low growth rate for Plymouth continues, despite a small expansion – suggestive of financial challenges due to low council tax base. This also presents itself in the low council tax income per head for Plymouth and large imbalances across the unitaries.

Qualitative appraisal

Strengths

Provides more land for economic growth and housing within the two new unitary councils.

The areas covered by the new North East Devon unitary council already look to Exeter as a centre, especially as a centre for commerce.

Creates an urban/rural balance with Plymouth preserved as an urban centre and the two new unitary councils relatively balanced as urban/rural/coastal areas.

Retains clearer local responsiveness and accountability.

Provides coherence with the new South Devon unitary council sharing demographic pressures (including frailty and statutory reliance), and the new North East Devon unitary council providing scale.

Provides resilience through scale whilst keeping local profiles visible.

Weaknesses

Within the new South Devon unitary council, there is no centre of commerce or economic activity at the scale of the Devon's cities with no current consensus on the primary or principal centre of commerce.

On existing Plymouth City Council boundaries, there is a significant difference in geographic size (Plymouth: 80 km², North East Devon unitary council: 3,844 km², South Devon unitary council: 2,783 km²).

If Plymouth City Council's boundaries where expanded, this would have a negative impact on the growth potential for the new South Devon unitary council.

If Plymouth City Council's boundaries are not expanded, it limits that Council's ability to grow.

2. Efficiency, capacity and withstanding financial shocks

Score: high

	Plymouth	South Devon	North-East Devon	Range
Grant funding per unit of population	£439	£325	£294	114
Non-earmarked reserves	£-59,844,305	£12,617,305	£15,049,000	£-74,893,305
Non-earmarked reserves per unit of population	£-220	£29	£27	-249.32
Ratio of financing costs to net revenue	8%	5%	5%	3%
Total funding/resources 26/7 per head	£1,242.54	£1,320.86	£1,401.11	158.57
Estimated savings from people services	£32.93m			-
Comparative ranking of likely set up costs	positive	neutral	neutral	neutral

Financial assessment

Strengths

The model shows a good balance across the unitaries with a smaller range for criteria such as grant funding and overall resources per head of population. Estimated people services savings are reasonable although not as high as other models.

Weaknesses

Transition costs are estimated to be relatively high due to changes across all Councils including Torbay as an existing unitary authority.

Although savings estimated remain at a reasonable level they are the lowest out of all the options. Plymouth financial challenges not improved.

Qualitative appraisal

Strengths

The population numbers of the proposed new unitary councils, together with the population of Plymouth, are close to the guiding principle of councils having a population of 500,000 or more.

Smaller organisations based in smaller geographies help to support local innovation.

Balances local responsiveness with some economies of scale, with the most opportunities for ongoing service budget savings.

Whilst there will be some upwards harmonisation of costs, these present significantly less risk than Option 1 and are contained in the sub-region.

Weaknesses

The demography of the new South Devon unitary council has an older, and ageing, population base which could lead to increased demand for adult social care and the associated costs.

3. High quality public services

Score: high

Strengths

Opportunity to help shape the market for children's services and adult social care in a wider geography.

Allows targeted approaches to different levels of income deprivation ((Plymouth: 24.4%, North East Devon unitary council: 17.3%, South Devon unitary council: 19.6%)

Allows for regional variation to be visible while pooling resilience across sub-regions, including opportunities for regional commissioning.

The new North East Devon unitary council would have a stronger, sustainable base within the adult social care market, with the market in South Devon more fragile, although a local focus would help tackle accessibility issues.

Creates a balanced footprint across the existing Devon and Torbay areas which enables the improvement of children in care sufficiency.

Weaknesses

Services over a larger geography would have to be carefully and sensitively created, otherwise they would not be relatable to place.

Both new unitary councils would need to develop delivery models which serve both rural and urban areas.

There would be challenges in disaggregating children's services and adult social care into the new South Devon and North East Devon unitary councils, with the added challenge of also aggregating the existing children's services and adult social care of Torbay Council into the South Devon unitary council.

The creation of a South Devon unitary council would likely see the end of the groundbreaking Integrated Care Organisation which currently delivers completely joined up health and social care to the residents of Torbay, including the community support model which supports residents without the need for statutory services.

The impact of combining authorities with and without Housing Revenue Accounts into a new North East Devon unitary council would need to be considered carefully.

4. Understanding local needs

Score: medium

Strengths

New North East Devon unitary council comprises, North Devon & Torridge with a shared coastal/rural identity, Mid Devon which bridges rural and urban; East Devon which connects Exeter.

New South Devon unitary council contains Dartmoor and coastal synergy with a diverse economy in marine, tourism, agriculture, and digital innovation.

North East Devon and South Devon

unitaries reflect some existing service groupings, but Exeter's inclusion in the North East Devon Councilmay complicate alignment with NHS and police zones.

The North East Devon unitary aligns well with Exeter Travel to Work Area and rural commuting flows.

South Devon unitary reflects Plymouth and Torbay Travel to Work Areas and their economic hinterlands.

Plymouth's standalone status aligns with existing arrangements in health and policing and aligns well with its distinct Travel to Work Area.

Protects the distinct trajectories of each area, including Torbay's Children's Services improvements, Plymouth's urban safeguarding pressures and the rural dementia and adult social care challenges in Devon.

Weaknesses

The new South Devon and North East Devon unitaries are larger than how people see their communities.

5. Supporting devolution

Score: high

Strengths

It would be relatively straightforward for the existing Devon and Torbay Combined County Authority (DTCCA) to be transferred into a Devon Combined Authority with the new North East Devon and South Devon unitary councils being constituent members (if Plymouth City Council remains on its existing boundaries).

All existing Leaders of the Devon councils are in favour of pursuing a MSA for the whole of Devon. This option would enable

such an Authority on a whole county footprint, including Plymouth City Council.

There would be equality of population size ratios between constituent authorities of any new MSA.

Weaknesses

If Plymouth City Council's boundaries are extended, there would be democratic disenfranchisement from the Combined Authority for those parts of the current South Hams District Council which would no longer be covered by the devolved powers of the Combined Authority.

If the Devon Combined Authority wishes to remain as a Foundation Strategic Authority and Plymouth City Council does not wish to join (as per the option with the DTCCA's Constitution), Plymouth City Council would become a "devolution island".

6. Community empowerment

Score: medium

Strengths

Strong parish networks in North East Devon

and South Devon unitaries could support area committees.

Potential for greater financial capacity to invest in community engagement.

Existing voluntary and community sector partnerships in Torbay and South Hams can be built upon.

Plymouth City Council has existing voluntary and community sector partnerships, but would need neighbourhood forums to represent local voice.

Enables some scale for investment and innovation whilst retaining local responsiveness.

Weaknesses

Communities in Exeter, Paignton and Torquay are not currently served by parish councils which could lead to disparity of representation and services in both the new South Devon and North East Devon unitary councils.



Option 2.2: Three unitary councils (Devon, Plymouth and Torbay)

1. Establishing a single tier of local Government

Score: low



	Plymouth	Torbay	Devon	Range
Population	270,000	140,000	840,000	-
Projected population growth to 2040	104%	106%	114%	-
Council Tax band D average	£2,325	£2,340	£2,405	-
Council Tax band D maximum	£2,325	£2,340	£2,471	-
Council Tax base	76,557	49,254	319,445	-
Council Tax base per unit of population	3.55	2.83	2.64	0.92
Council Tax income per unit of population	£580	£726	£808	-229
Business rates per unit of population	£245	£261	£193	69

Financial assessment

Strengths

Limited but includes a more unified voice to central Government.

Weaknesses

The model does not show a good balance across unitaries for some metrics around council tax and business rates with high variances for the rates per head of population. There is imbalance across unitaries when looking at population and tax base sizes and concerns about the overall size of the Devon unitary. Estimates of 2040 population also suggests imbalance and a very low growth rate for Plymouth, suggesting financial challenges due to low council tax base.

Qualitative appraisal

Strengths

Retains clearer local responsiveness and accountability.

Reflects the distinct socio-economic, demographic, and service delivery realities across Torbay, Plymouth, and the rest of the Devon County area.

The potential expansion of Plymouth City Council is based on the Plymouth Growth Area and aligns well with its distinct Travel to Work Area.

Weaknesses

Extreme imbalance in geographic size (Torbay at 63km², Plymouth at 80km² and Devon at 6,627km²) with the new Devon unitary council being much larger than housing market and travel to work areas.

The geographic scale of a new Devon unitary council creates risks with a lack of connectivity across the area.

2. Efficiency, capacity and withstanding financial shocks

Score: medium

	Plymouth	Torbay	Devon	Range
Grant funding per unit of population	£452	£514	£270	244
Non-earmarked reserves	£-60,138,000	£6,400,000	£21,560,000	-81,698,000
Non-earmarked reserves per unit of population	£-221	£46	£26	-246.64
Ratio of financing costs to net revenue	8%	9%	4%	5%
Total funding/resources 26/7 per head	£1,260.82	£1,501.36	£1,277.76	240.54
Estimated savings from people services		-		
Comparative ranking of likely set up costs	positive	positive	neutral	positive

Financial Assessment

Strengths

The Newton model suggests a high level of potential savings is possible. Transition costs are expected to be relatively low as both Plymouth and Torbay would continue unchanged as existing unitaries.

Weaknesses

It shows a large imbalance in reserves and funding per head, placing continuing challenges on the viability of Plymouth, without any expansion. It also presents a large variance and imbalance in the rate of grant funding per head.

Qualitative appraisal

Strengths

Protects Torbay Council's lower long term care costs from a potential significant uplift if merged into a Devon unitary council.

Avoids potential cost uplifts in Torbay and Plymouth from harmonisation.

More transparent financial planning and accountability, allowing resources to be aligned to differing socio economic needs.

Preserves visibility of very different financial profiles in relation to children's services enabling tailored local strategies.

Weaknesses

The populations of the authorities would not be equitable, with the size of the new Devon unitary authority well above the Government's guiding principle of a population of 500,000 or more.

3. High quality public services

Score: high

Strengths

Maintains the groundbreaking Integrated Care Organisation which currently delivers joined up health and social care to the residents of Torbay, including the community support model which supports residents without the need for statutory services.

Reflects the distinct profiles of the three areas in relation to high cost services, enabling local support dependant on need.

All three areas face age related pressures but with Plymouth and Torbay on sharper trajectories; this option enables localised support dependant on need. Supports a more tailored service model responsive to urban versus rural contexts.

Children's services and adult social care would not need to be disaggregated in Plymouth or Torbay enabling a focus on improving children's services and services for children and young people with SEND.

Preserves accountability for local performance variations, especially in relation to children's services, enabling tailored improvement.

Preserves visibility of very different demand, practice and cost profiles across the three upper tier authorities.

Preserves visibility of different SEN profiles, enabling the adoption of tailored improvement strategies.

Enables joint commissioning where appropriate, including for market shaping, but preserves clear local accountability for managing costs.

Enables local solutions to be found for different workforce pressures and retains local responsiveness to these pressures.

Weaknesses

Services over a larger geography within the new Devon unitary council would have to be carefully and sensitively created, otherwise they would not be relatable to place.

Difficult to undertake effective coproduction across a bigger geographic area, making it more difficult to have really good service design.

The impact of combining authorities with and without Housing Revenue Accounts into a new Devon unitary council would need to be considered carefully.

4. Understanding local needs

Score: medium

Strengths

Supports local councils' abilities to meet the distinctive needs of their communities better.

New Devon unitary council blends urban, rural and coastal communities which could reflect the pan-Devon sense of belonging.

Plymouth and Torbay retains their strong urban identity, including the identities of Britain's Ocean City and the English Riviera.

Plymouth and Torbay's standalone status aligns with existing arrangements in health and policing, and reflects Plymouth's distinct Travel to Work Area.

Maintains the strong, coherent voluntary, community and social enterprise sectors within Plymouth and Torbay, vital for supporting preventative work within communities.

Protects the distinct trajectories of each area, including Torbay's Children's Services improvements, Plymouth's urban safeguarding pressures and the rural dementia and adult social care challenges in Devon.

Weaknesses

A new Devon unitary council does not fit well with people's local sense of identity and their connection to their local town and community.

Devon wide unitary includes multiple travel to work areas, which may dilute alignment with specific commuting patterns.

5. Supporting devolution

Score: medium

Strengths

It would be relatively straightforward for the existing Devon and torbay Combined County Authority to be transferred into a Devon Combined Authority with the new Devon unitary council and Torbay Council being constituent members.

All existing Leaders of the Devon Councils are in favour of pursuing a MSA for the whole of Devon. This option would enable such an Authority on a whole county footprint, including Plymouth City Council.

Weaknesses

There would be inequality of population size ratios between constituent authorities of any new Mayoral Strategic Authority.

If Plymouth City Council's boundaries are extended, there would be democratic disenfranchisement from the Combined Authority for those parts of the current South Hams District Council which would no longer be covered by the devolved powers the Combined Authority.

If the Devon Combined Authority wishes to remain as a Foundation Strategic Authority and Plymouth City Council does not wish to join (as per the option with the DTCCA's Constitution), Plymouth City Council would become a "devolution island".

6. Community empowerment

Score: medium

Strengths

Torbay Council has an existing network of Community Partnerships which could form the basis of neighbourhood committees.

Plymouth City Council has existing voluntary and community sector partnerships, but would need neighbourhood forums to represent local voice.

Communities in Plymouth and Torbay would maintain closer access to local councillors and the democratic process.

Compact unitaries sustain local voice and alignment with residents' needs.

Weaknesses

Potential for democratic deficit in the new Devon unitary council due to large geographic spread, with the potential of struggling to maintain meaningful local engagement due to scale.

More difficult for communities to have access to their local councillors and the democratic process in a new Devon unitary council due to poor connectivity in a large geographic area.

The new Devon unitary council would be further away from communities and would need to mitigate this through effective neighbourhood governance.

Complexity and scale within the new Devon unitary council risk weakening neighbourhood empowerment and accountability.



The following two variations of option 3 (3.1 for Torbay to remain within its current boundaries and 3.2 for Torbay to expand its boundaries) share much of a common rationale. They scored very similarly, only differing on criterion six - Community Empowerment. Therefore, the tables below present much of the same information. We have presented them here separately for ease of reference and to highlight the distinctive aspects of their financial evaluation.

Option 3.1: Four unitary councils (Torbay, expanded Plymouth and new Exeter and Rural Devon Coast and Countryside Councils)



1. Establishing a single tier of local Government

Score: high

	Plymouth	Torbay	Exeter	Devon	Range
Population	300,000	140,000	260,000	550,000	-
Projected population growth to 2040	105%	106%	114%	115%	-
Council Tax band D average	£2,359	£2,340	£2,394	£2,405	-
Council Tax band D maximum	£2,392	£2,340	£2,433	£2,433	-
Council Tax base	92,984	49,254	90,266	212,752	-
Council Tax base per unit of population	3.23	2.83	2.84	2.52	0.71
Council Tax income per unit of population	£630	£726	£720	£837	-207
Business rates per unit of population	£238	£261	£178	£201	60

Financial assessment

Strengths

This model has a good balance across the four unitaries and provides the best balance in the council tax base per head of population and good balance across the council tax income and business rates per head of population. With an expanded Plymouth the

council tax base issues are improved with estimated growth figures.

Weaknesses

Limited. Separation of the three major urban centres may result in some economic challenges for a rural Devon, although council tax base and rates per head of population appear reasonable.

Qualitative appraisal

Strengths

Retains clearer local responsiveness and accountability.

Reflects the distinct socio-economic, demographic, and service delivery realities

across Torbay, Plymouth, Exeter and the rest of Devon.

Bases three unitary councils around the urban areas of Exeter, Plymouth and Torbay with dense populations and clear identities, and being service centres for the surrounding rural and coastal communities. The fourth unitary council has a clear rural focus.

Weaknesses

The geographic scale and fragmentation of a new Devon unitary council creates risks with a lack of connectivity across the area.

2. Efficiency, capacity and withstanding financial shocks

Score: high

	Plymouth	Torbay	Exeter	Devon	Range
Grant funding per unit of population	£419	£514	£309	£259	255
Non-earmarked reserves	£-59,326,065	£6,400,000	£9,159,316	£11,588,748	-71,433,053
Non-earmarked reserves per unit of population	£-97	£46	£36	£22	-243.18
Ratio of financing costs to net revenue	7%	9%	6%	4%	5%
Total funding/resources 26/7 per head	£1,242.54	£1,501.36	£1,314.72	£1,271.28	258.82
Estimated savings from people services		-			
Comparative ranking of likely set up costs	positive	positive	negative	neutral	positive

Financial assessment

Strengths

The Newton model suggests a high level of potential savings is possible. Transition costs are expected to be relatively low due to the two current Unitary Councils continuing -

Torbay would remain unchanged and Plymouth with a slight expansion.

Weaknesses

The imbalance between the level of funding per head of population is high with Torbay remaining unchanged and could continue. Although Plymouth expands it still has some financial challenges with the lowest rate of funding per head and low reserves per head.

Qualitative appraisal

Strengths

Protects Torbay Council's lower long term care costs from a potential significant uplift if merged into a Devon unitary council.

More transparent financial planning and accountability, allowing resources to be aligned to differing socio-economic needs.

Preserves visibility of very different financial profiles in relation to children's services enabling tailored local strategies.

Weaknesses

The new Devon unitary council may be too large and fragmented and therefore lose some of the efficiencies available from more local working.

3. High quality public services

Score: high

Strengths

Maintains the groundbreaking Integrated Care Organisation which currently delivers joined up health and social care to the residents of Torbay, including the community support model which supports residents without the need for statutory services.

Reflects the distinct profiles of the three urban areas in relation to high-cost services, enabling local support dependant on need.

Supports a more tailored services model responsive to urban versus rural contexts.

Enables joint commissioning where appropriate, including for market shaping, but preserves clear local accountability for managing costs.

Enables local solutions to be found for different workforce pressures and retains local responsiveness to these pressures.

Children's services and adult social care would not need to be disaggregated in Plymouth or Torbay enabling a focus on improving children's services and services for children and young people with SEND.

Weaknesses

Children's services and adult social care would need to be disaggregated to create the new Exeter and Devon unitary councils with the risk of losing focus on improving children's services and services for children and young people with SEND.

Services over a larger geography within the new Devon unitary council would have to be carefully and sensitively created, otherwise they would not be relatable to place.

Difficult to undertake effective coproduction across a bigger geographic area, making it more difficult to have really good service design.

The impact of combining authorities with and without Housing Revenue Accounts into a new Devon unitary council would need to be considered carefully.

4. Understanding local needs

Score: high

Strengths

Supports local councils' abilities to meet the distinctive needs of their communities better.

Plymouth and Torbay retains their strong urban identity, including the identities of Britain's Ocean City and the English Riviera.

New Exeter council recognises Exeter's growing role as a regional hub for employment, education, and transport.

Maintains the strong, coherent voluntary, community and social enterprise sectors within Plymouth and Torbay, vital for supporting preventative work within communities.

New Devon unitary council provides focus on delivering services to rural communities.

Weaknesses

A new Devon unitary council does not fit well with people's local sense of identity and their connection to their local town and community.

Separate (expanded) unitaries for Exeter and Plymouth introduce complexity and misalignment with existing service footprints.

5. Supporting devolution

Score: high

Strengths

The existing DTCCA would be transferred into a Devon Combined Authority with the new Devon and Exeter unitary councils and Torbay Council being constituent members (if Plymouth City Council remains on its existing boundaries).

All existing Leaders of the Devon councils are in favour of pursuing a MSA for the whole of Devon. This option would enable such an authority on a whole county footprint, including Plymouth City Council.

There would be equality of population size ratios between constituent councils of any new MSA.

Weaknesses

If Plymouth City Council's boundaries are extended, there would be democratic

disenfranchisement from the Combined Authority for those parts of the current South Hams District Council which would no longer be covered by the devolved powers of the Combined Authority.

If the Devon Combined Authority wishes to remain as a Foundation Strategic Authority and Plymouth City Council does not wish to join (as per the option within the CCA's Constitution), Plymouth City Council would become a "devolution island".

6. Community empowerment

Score: high

Strengths

Torbay Council has an existing network of Community Partnerships which could form the basis of neighbourhood committees.

Plymouth City Council has existing voluntary and community sector partnerships, but would need neighbourhood forums to represent local voice.

Communities in Plymouth and Torbay would maintain closer access to local councillors and the democratic process.

Weaknesses

The new Exeter unitary council would need to consider new area governance arrangements which balances the needs of parished and unparished areas.

More difficult for communities to have access to their local councillors and the democratic process in a new Devon unitary council due to poor connectivity in a large geographic area.

The new Devon unitary council would be further away from communities and would need to mitigate this through effective neighbourhood governance.

Option 3.2: Four unitary councils (Expanded Torbay, Plymouth and Exeter Councils and Rural Devon Coast and Countryside Council

1. Establishing a single tier of local Government

Score: high



	Plymouth	Torbay	Exeter	Devon	Range
Population	300,000	220,000	260,000	470,000	-
Projected population growth to 2040	105%	110%	114%	114%	-
Council Tax band D average	£2,359	£2,400	£2,394	£2,400	-
Council Tax band D maximum	£2,392	£2,471	£2,433	£2,433	-
Council Tax base	92,984	82,356	90,266	182,395	-
Council Tax base per unit of population	3.23	2.67	2.84	2.44	0.79
Council Tax income per unit of population	£630	£767	£720	£837	207
Business rates per unit of population	£238	£227	£178	£201	60

Financial assessment

Strengths

This model has a good balance across the four unitaries. With an expanded Torbay the council tax base improved and is more balanced and the council tax income and business rates per head of population are also good. With an expanded Plymouth their growth by 2040 is slightly better than other options and Torbay significantly improves due to their expansion.

Weaknesses

Although the council tax base levels improve and are much less imbalanced, there is a relatively high range and imbalance between the council tax base per head of population.

Qualitative appraisal

Strengths

Retains clearer local responsiveness and accountability.

Reflects the distinct socio-economic, demographic, and service delivery realities across Torbay, Plymouth, Exeter and the rest of Devon.

Bases three unitary councils around the urban areas of Exeter, Plymouth and Torbay with dense populations and clear identities, and being service centres for the surrounding rural and coastal communities. The fourth unitary council has a clear rural focus.

Weaknesses

The geographic scale and fragmentation of a new Devon unitary council creates risks with a lack of connectivity across the area.

2. Efficiency, capacity and withstanding financial shocks

Score: high

	Plymouth	Torbay	Exeter	Devon	Range
Grant funding per unit of population	£419	£392	£309	£259	161
Non-earmarked reserves	£-59,326,065	£8,363,001	£9,159,316	£9,625,747	-68,951,812
Non-earmarked reserves per unit of population	£-197	£38	£36	£22	-235.25
Ratio of financing costs to net revenue	7%	8%	6%	4%	4%
Total funding/resources 26/7 per head	£1,242.54	£1,404.24	£1,314.72	£1,275.76	161.70
Estimated savings from people services		-			
Comparative ranking of likely set up costs	positive	positive	negative	negative	neutral

Financial assessment

Strengths

The Newton model suggests a high level of potential savings is possible. This model provides a good balance of funding per head across the four unitaries, although Plymouth's remain low.

Weaknesses

Transition costs are expected to be higher than option 3.1 due to expansion and change to Torbay, but still relatively low due to the two current unitary councils continuing.

Although Plymouth expands it still has some financial challenges with the lowest rate of funding per head and low reserves per head.

Qualitative appraisal

Strengths

Protects Torbay Council's lower long term care costs from a potential significant uplift if merged into a Devon unitary council.

More transparent financial planning and accountability, allowing resources to be aligned to differing socio economic needs.

Preserves visibility of very different financial

profiles in relation to children's services enabling tailored local strategies.

Weaknesses:

The new Devon unitary council may be too large and fragmented and therefore lose some of the efficiencies available from more local working.

3. High quality public services

Score: high

Strengths

Maintains the groundbreaking Integrated Care Organisation which currently delivers joined up health and social care to the residents of Torbay, including the community support model which supports residents without the need for statutory services.

Reflects the distinct profiles of the three areas in relation to high cost services, enabling local support dependant on need.

Supports a more tailored services model responsive to urban versus rural contexts.

Enables joint commissioning where appropriate, including for market shaping, but preserves clear local accountability for managing costs.



Enables local solutions to be found for different workforce pressures and retains local responsiveness to these pressures.

Children's services and adult social care would not need to be disaggregated in Plymouth or Torbay enabling a focus on improving children's services and services for children and young people with SEND.

Weaknesses

Children's services and adult social care would need to be disaggregated to create the new Exeter and Devon unitary councils with the risk of losing focus on improving children's services and services for children and young people with SEND.

In creating an expanded Torbay, children's services and adult social care would need to be both aggregated and disaggregated.

Services over a larger geography within the new Devon unitary council would have to be carefully and sensitively created, otherwise they would not be relatable to place.

Difficult to undertake effective coproduction across a bigger geographic area, making it more difficult to have really good service design.

The impact of combining authorities with and without Housing Revenue Accounts into a new Devon unitary council would need to be considered carefully.

4. Understanding local needs

Score: high

Strengths

Supports local councils' abilities to meet the distinctive needs of their communities better.

Plymouth and Torbay retains their strong urban identity, including the national and international identities of Britain's Ocean

City and the English Riviera.

New unitary Exeter council recognises Exeter's growing role as a regional hub for employment, education, and transport.

Maintains the strong, coherent VCSE sectors within Plymouth and Torbay, vital for supporting preventative work within communities.

New Devon unitary council provides focus on delivering services to rural communities.

Weaknesses

A new Devon unitary council does not fit well with people's local sense of identity and their connection to their local town and community.

Separate (expanded) unitaries for Exeter and Plymouth introduce complexity and misalignment with existing service footprints.

5. Supporting devolution

Score: high

Strengths

The existing DTCCA could be transferred into a Devon Combined Authority with the new Devon and Exeter unitary councils and Torbay Council being constituent members (if Plymouth City Council remains on its existing boundaries).

All existing Leaders of the Devon councils are in favour of pursuing a MSA for the whole of Devon. This option would enable such an Authority on a whole county footprint, including Plymouth City Council.

There would be equality of population size ratios between constituent authorities of any new MSA.

Weaknesses:

If Plymouth City Council's boundaries are extended, there would be democratic disenfranchisement from the Combined Authority for those parts of the current South Hams District Council which would no longer be covered by the devolved powers the Combined Authority.

If the Devon Combined Authority wishes to remain as a Foundation Strategic Authority and Plymouth City Council does not wish to join (as per the option within the CCA's Constitution), Plymouth City Council would become a "devolution island".

6. Community empowerment

Score: medium

Strengths

Torbay Council has an existing network of Community Partnerships which could form the basis of neighbourhood committees.

Plymouth City Council has existing voluntary and community sector partnerships, but

would need neighbourhood forums to represent local voice.

Communities in Plymouth and Torbay would maintain closer access to local councillors and the democratic process.

Weaknesses

The expanded Torbay Council would need to consider new area governance arrangements which balances the needs of parished and unparished areas.

The new Exeter unitary council would need to consider new area governance arrangements which balances the needs of parished and unparished areas.

More difficult for communities to have access to their local councillors and the democratic process in a new Devon unitary council due to poor connectivity in a large geographic area.

The new Devon unitary council would be further away from communities and would need to mitigate this through effective neighbourhood governance.

Options appraisal conclusion

Based on our assessment, we believe that Option 3.1 is the best option for Devon.

A four unitary configuration that would maintain Torbay Council on its existing boundaries, see Plymouth City Council as a continuing authority and expand its area to cover the Plymouth Growth Area, establish a new Exeter Council on expanded boundaries and establish a Rural Devon Coast and Countryside Council serving the rural communities of Devon.

This would create more financially resilient and sustainable local Government, maintain services that are currently strong and lay foundations for improved services – whilst providing the conditions for the formation of a Mayoral Strategic Authority for the whole of Devon.

PART ONE

Base Proposal

As per the requirements of Part 1 of the Local Government and Public Involvement in Health Act 2007, a Base Proposal is required and is presented here for compliance. The base proposal does not represent the proposal we are advancing. Our substantive proposal (Modified Proposal) as set out in the next section, seeks a ministerial modification to refine the Base Proposal into our four unitary solution for Devon.

Compliance statement

This section constitutes our Base Proposal on whole district boundaries, prepared in accordance with Part 1 of the Local Government and Public Involvement in Health Act 2007 (the Act) and the 5 February 2025 statutory invitation from the Ministry of Housing, Communities and Local Government to develop a proposal for local Government reorganisation. It is a statutory base proposal we are advancing in the first part of this section. Our substantive proposal (Modified Proposal), which requests ministerial modification, follows.

Base Proposal configuration

The Base Proposal groups existing principal authorities into four unitary councils without any changes to existing district or borough council boundaries.

Unitary A: Exeter City Council (Type B proposal)

Unitary B: Plymouth City Council (As a continuing unitary authority)

Unitary C: Torbay Council (As a continuing unitary authority)

Unitary D: East Devon District Council, Mid Devon District Council, Teignbridge District Council, Torridge District Council, North Devon District Council, South Hams District Council and West Devon Borough Council (Type B proposal)

Assessment against the Government's criteria

1. Sensible geographies

- Creates four unitary councils using existing principal authorities as building blocks.
- Meets the Government's invitation to set out a base case on whole districts.
- Removes the existing two tier arrangements in Devon.

2. Efficiency and resilience

- Reduction of the number of councils from 11 to four would provide efficiency savings through the rationalisation of senior roles and governance and consolidation of systems and estates.
- Commissioning essential services on a smaller scale creates opportunities to address higher unit costs in the current county area.

3. High quality public services

- Establishment of single tier local Government removes duplication and confusion of service delivery
- Maximises opportunities to maintain service continuity, especially in the areas of SEND and social care.

Working together to understand and meet local needs

 Provides for recognised and legally coherent administrative boundaries.

5. Supporting devolution

 Creates a group of constituent councils across Devon to form a South West Peninsular Mayoral Strategic Authority (MSA) (which could include Cornwall Council).

6. Community empowerment

- Maintains a foundation of existing governance arrangements in each of the unitary councils enabling a transition to the new arrangements set out in the English Devolution and Community Empowerment Bill being enacted.
- Enables a Local Government Boundary Commission review of ward boundaries to be undertaken after Vesting Day.



PART ONE

Our Modified Proposal - Four unitary solution

This section sets out the modified proposal we are asking Government to consult on and consider. The proposal is a modification of our Base Proposal which is based on whole districts in accordance with section 2 of the Local Government and Public Involvement in Health Act 2007.

We show the precise areas that would be involved in boundary changes, set out the rationale for change and provide an overview of how the option performs against the Government's criteria.

The Modified Proposal groups existing principal authorities into four unitary councils with the changes to existing district or borough council boundaries as described.

Unitary A: Exeter Council (Type B proposal)

A new unitary council based on the current Exeter City Council boundary with a population of 131,000 with a Ministerial modification to extend this with 15 parishes from within Teignbridge District Council, 28 parishes from within East Devon District Council and 6 parishes from with within Mid Devon District Council resulting in a population of 260,000. The specific parishes are listed on the next page.

Unitary B: An expanded Plymouth City Council (as a continuing unitary authority)

The continuing unitary council of Plymouth City Council with a population of 270,000 with a Ministerial modification to include 13 parishes from within the South Hams District Council, resulting in a population of 300,000. The specific parishes are listed on the next page.

Unitary C: Torbay Council (As a continuing unitary authority)

The continuing unitary council of Torbay Council on its current boundaries with a population of 140,000.

Unitary D: Rural Devon Coast and Countryside Council (Type B proposal)

A new unitary council covering the rest of the former Devon County Council area resulting in a population of 550,000



List of parishes

Expanded Exeter includes:

Exeter City Council district plus 15 parishes for within Teignbridge District Council boundaries:

- Dawlish
- Ashcombe
- Mamhead
- Starcross
- Kenton
- Chudleigh
- Powderham
- Exminster
- Kenn
- Dunchideock
- Shillingford St. George
- Ide
- Holcombe Burnel
- Whitestone
- Tedburn St. Mary

28 parishes from within East Devon District Council boundaries:

- Exmouth
- Woodbury
- Lympstone
- Otterton
- East Budleigh
- Budleigh Salterton
- Colaton Raleigh
- Bicton
- Upton Pyne
- Brampford Speke
- Stoke Canon
- Nether Exe
- Rewe
- Huxham
- Poltimore
- Broadclyst

- Clyst Hydon
- Clyst St. Lawrence
- Whimple
- Cranbrook
- Rockbeare
- West Hill
- Aylesbeare
- Farringdon
- Honiton
- Sowton
- Clyst St. Mary
- Clyst St. George

six parishes from within Mid Devon District Council boundaries:

- Cheriton Bishop
- Hittisleigh
- Colebrooke
- Crediton
- Crediton Hamlets
- Newton St. Cyres.

Expanded Plymouth incudes:

Plymouth City Council district plus 13 parishes from South Hams district:

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

Rationale for our four unitary model

Our Modified Proposal sensibly reflects
Devon's geography, topography and ways
of life – three coherent economic areas
aligned to key corridors and one larger rural,
coast and countryside council. It provides
a credible single tiered local Government
solution to Devon's unique mix of coastal,
urban and rural communities.

Torbay, Plymouth and Exeter will be empowered to lead on urban priorities while the new Rural Devon Coast and Countryside Council can focus on the distinct needs of dispersed rural communities, market towns and villages.

It demonstrates how tailored governance can better meet distinct local needs and can deliver achievable service and organisational savings within five years. Our modified proposal is a locally grounded, future ready solution that delivers best value for residents and places Devon on a firmer financial footing.

Our proposal supports high quality, locality based services by implementing structures which best reflect the distinct profiles of our areas. It avoids unnecessary fragmentation by building on the existing capacity of the existing unitary councils serving Plymouth and Torbay, while ensuring that the new unitary councils are operationally viable.

Using the existing Devon and Torbay Combined County Authority as a strong first step, our modified proposal provides sensible population ratio sizes between constituent authorities as we move to a South West Peninsula Mayoral Strategic Authority. We see the future MSA as the key to unlock the power of combining localism with regional scale for both the four unitary model and the wider peninsula.

Community empowerment is at the core of our proposal. It will deepen local engagement by aligning governance with community identity and lived experience. It builds on existing innovative and inclusive approaches to community engagement in Exeter, Plymouth and Torbay. It sets a framework for the development of new approaches to neighbourhood empowerment across Devon with the existing network of parish and town councils as a strong and established foundation.

With each authority having tailored councillor representation to ensure fair and accessible governance, we will reduce administrative complexity and enhance responsiveness to local needs - urban, coastal, and rural alike.



Government criteria at a glance: our four unitary solution

1. Sensible geographies

Unitary A

Exeter Council

- Exeter Council will be one of the two new unitary councils in Devon.
- Allows for Exeter City Council to be the principal authority building block.
- Removes the existing two tier arrangements in Exeter and the surrounding area.

Unitary B

Expanded Plymouth City Council

- The expanded Plymouth Council will be one of the four unitary councils in Devon.
- Allows for Plymouth City Council to be defined as a "continuing authority" to minimise organisational disruption.
- Removes the existing two tier arrangements in the expanded Plymouth area.

Unitary C

Torbay Council

- Torbay Council will be one of the four unitary councils in Devon.
- Maintaining Torbay Council as a continuing authority eliminates organisational disruption.

Unitary D

Rural Devon Coast and Countryside Council

- Rural Devon Coast and Countryside Council will be one of the two new unitary councils in Devon.
- Allows for Devon Country Council to be the principal authority building block (excluding the modification areas in Exeter and Plymouth)
- Removes the existing two tier arrangements in the whole of Devon.

2. Efficiency and resilience

Unitary A

Exeter Council

- Creates a growth orientated unitary council with a population of 260,000.
- Allows for better coordination of critical infrastructure in the wider area.
- Council size reflects the dispersed settlement pattern in the South West and those towns and villages most functionally linked to Exeter.
- Tax base which is sustainable and large enough to resist financial shocks.

Unitary B

Expanded Plymouth City Council

- Creates a unique, nationally significant growth orientated unitary council with a population of 300,000 growing to 325,000 by 2050.
- Allows for better coordination of critical infrastructure in the wider area.
- Council size reflects the dispersed settlement pattern in the South West and those towns and villages most functionally linked to Plymouth.
- Over 5% increase in the tax base which is sustainable and large enough to resist financial shocks.

Unitary C

Torbay Council

- Permits continuation of our unique and nationally significant model of integrated delivery of adult social care within the NHS.
- Maintains Torbay Council's lower long term care costs
- Allows resources to be aligned to the specific socio economic needs of Torbay.
- Tax base which is sustainable and large enough to resist financial shocks.

Unitary D

Rural Devon Coast and Countryside Council

- Creates a rurally focused unitary council with a population of 550,000.
- Council size reflects the dispersed settlement pattern in the Devon but retains most of the priority towns in the new council area.
- Keeps market towns and most rural areas together at a sustainable scale.
- Tax base which is sustainable and large enough to resist financial shocks.

3. High quality public services

Unitary A

Exeter Council

- Creates coherent service geography based on a new localised, place based model of provision in relation to adult and children's social care, SEND and other critical public services.
- Maximises the opportunities for growth, given Exeter's strategic role as a major transport hub and as a UNESCO City of Literature.
- Simplifies access to services for residents.
- Reduces administrative duplication.
- Provides service reform opportunities.
- Enables strategic planning to be better coordinated within a Mayoral Strategic Authority (MSA).

Unitary B

Expanded Plymouth City Council

- Maximises the opportunities for growth, linked to HM Naval Base at Devonport and Defence Growth Deal.
- Creates coherent service geography.
- Simplifies access to services for residents.
- Reduces administrative duplication.
- Provides service reform opportunities.
- Enables strategic planning to be better coordinated within a MSA.

Unitary C

Torbay Council

- Existing coherent service geography with the ability to focus on coastal renewal.
- Maintains existing innovative and integrated approach to health and social care.
- Maintains simplified access to services for residents.
- Provides service reform opportunities.
- Enables strategic planning to be better coordinated within a MSA.

Unitary D

Rural Devon Coast and Countryside Council

- Creates coherent service geography focused on delivering services in a rural area.
- Enables a single local approach to rural prevention and family support.
- Simplifies access to services for residents.
- Reduces administrative duplication.
- Provides service reform opportunities.
- Enables strategic planning to be better coordinated within a MSA

4. Working together to understand and meet local needs

Unitary A

Exeter Council

- Discussions between Leaders and Chief Executives across all councils in Devon have regularly taken place during 2025.
- Comparable size to other proposed unitary councils in Devon.

Unitary B

Expanded Plymouth City Council

- Discussions between Leaders and Chief Executives across all councils in Devon have regularly taken place during 2025.
- Directly responds to concerns and issues raised during public engagement on reorganisation.
- Transitional arrangements easier to implement.
- Comparable size to other proposed unitary councils in Devon.

Unitary C

Torbay Council

- Discussions between Leaders and Chief Executives across all councils in Devon have regularly taken place during 2025.
- Keeps coastal towns together reflecting character and identity.
- Maintains the strong, coherent Voluntary, Community and Social Enterprise sector vital for supporting preventative work within communities.
- Responds directly to the concerns and issues raised during public engagement on reorganisation.

Unitary D

Rural Devon Coast and Countryside Council

- Discussions between Leaders and Chief Executives across all councils in Devon have regularly taken place during 2025.
- Potential to build upon existing Devon County Council local partnership working arrangements, including the Health and Wellbeing Board for Devon, the Devon Association of Local Councils, and the Local Civil Contingencies Partnership.

5. Supporting devolution

Unitary A

Exeter Council

- Creates a group of constituent authorities across Devon to form a South West Peninsula MSA (which could include Cornwall Council).
- Provides a strategically complementary growth role by allowing for early identification of opportunities in the future Peninsula Spatial Development Strategy.

Unitary B

Expanded Plymouth City Council

- Creates a group of constituent authorities across Devon to form a South West Peninsula MSA (which could include Cornwall Council).
- Provides a strategically complementary growth role by allowing for early identification of opportunities in the future Peninsula Spatial Development Strategy.

Unitary C

Torbay Council

- Creates a group of constituent authorities across Devon to form a South West Peninsula MSA (which could include Cornwall Council).
- Provides a strategically complementary growth role by allowing for early identification of opportunities in the future Peninsula Spatial Development Strategy.

Unitary D

Rural Devon Coast and Countryside Council

- Creates a group of constituent authorities across Devon to form a South West Peninsula MSA (which could include Cornwall Council).
- Provides a strategically complementary growth role by allowing for early identification of opportunities in the future Peninsula Spatial Development Strategy.

6. Community empowerment

Unitary A

Exeter Council

- Supports proposal for the creation of Neighbourhood Networks Area Forums approach.
- Protects existing parish and town council arrangements.
- Enables a Local Government Boundary Commission review of ward boundaries to be undertaken after Vesting Day.

Unitary B

Expanded Plymouth City Council

- Supports proposal for the phased creation of Neighbourhood Networks and a "Test, Learn Grow" pilot approach.
- Protects existing parish and town council arrangements.
- Enables a Local Government Boundary Commission review of ward boundaries to be undertaken after Vesting Day.

Unitary C

Torbay Council

- Enables the existing Community Partnerships in Torbay to form the basis of further community empowerment.
- Protects existing town council arrangements.

Unitary D

Rural Devon Coast and Countryside Council

- Protects existing parish and town council arrangements.
- Enables rurally focused governance arrangements building upon the VCSE Assembly and existing Devon County Council Civic Agreement.
- Enables a Local Government Boundary Commission review of ward boundaries to be undertaken after Vesting Day.



Request for ministerial modification to Base Proposal

We request that the Secretary of State modifies the statutory Base Proposal outlined in this section, incorporating the boundary refinements detailed above. These adjustments more effectively meet the Government's criteria by enhancing the coherence of public services, strengthening financial sustainability, supporting local identities, and achieving the right balance of partners for devolution.

Advantages of the Modified Proposal

Whilst our Base Proposal for four unitary councils meets the very basics of the Government's criteria, our Modified Proposal strikes the right balance to make the most of the once in a generation opportunity to create local Government that is:

- Focused on place and delivering with purpose - councils designed around real places, communities and economies.
- Based in sensible geographies focused on distinct places and able to better manage resources, attract investment and deliver value for money.

- Providing smarter services reducing duplication and complexity, to deliver better decision making and improved customer experiences.
- Has the right financial foundations based on a fair and balanced tax base to support financial resilience and equitable service delivery.
- Serving our environment from our coasts, to cities, towns and villages, to our countryside.

The following table shows the advantages of our Modified Proposal over and above our Base Proposal.

1. Sensible geographies

Base Proposal

- Creates four unitary councils using existing principal authorities as building blocks.
- Meets the Government's invitation to set out a base case on whole districts.
- Removes the existing two tier arrangements in Devon.

Modified Proposal

- Reflects the true nature of place enabling planning, investment and infrastructure decisions to made consistently across the wider area.
- Aligns with functional economic areas.
- Drives growth in three urban based councils and allows complete focus on delivery of services to rural communities in the fourth unitary area

2. Efficiency and resilience

Base Proposal

- Reduction of the number of councils from 11 to four would provide efficiency savings through the rationalisation of senior roles and governance and consolidation of systems and estates.
- Commissioning essential services on a smaller scale creates opportunities to address higher unit costs in the current county area.

Modified Proposal

- Allows for better coordination of critical infrastructure in the wider area.
- Tax base of each council is sustainable and large enough to resist financial shocks.

3. High quality public services

Base Proposal

- Establishment of single tier local
 Government removes duplication and confusion of service delivery
- Maximises opportunities to maintain service continuity, especially in the areas of SEND and social care.

Modified Proposal

- Creates coherent service geography based on a new localised, place based model in either urban or rural areas.
- Reduces administrative duplication.
- Provides service reform opportunities.
- Enables strategic planning to be better coordinated within a MSA.

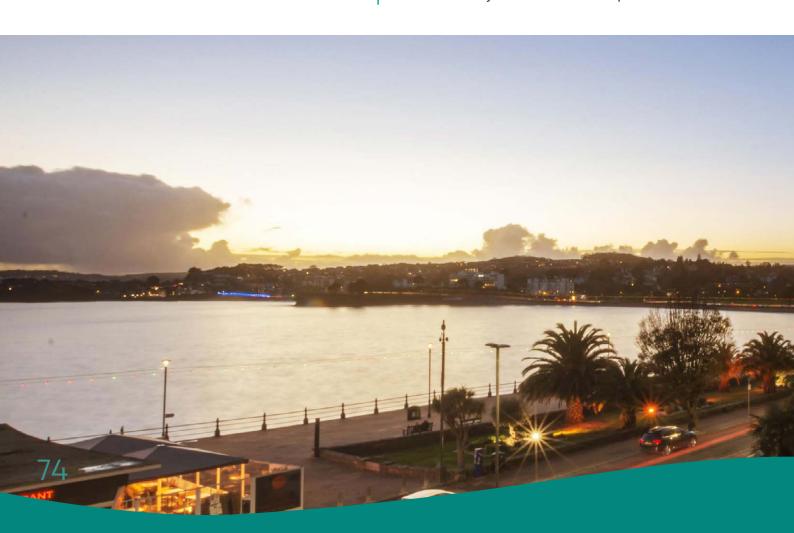
4. Working together to understand and meet local needs

Base Proposal

 Provides for recognised and legally coherent administrative boundaries.

Modified Proposal

- Directly responds to concerns and issues raised during public engagement on reorganisation.
- Builds on existing good partnerships and relationships with the voluntary, community and social enterprise sector.



5. Supporting devolution

Base Proposal

 Creates a group of constituent councils across Devon to form a South West Peninsular MSA (which could include Cornwall Council).

Modified Proposal

There would be equality of population size ratios between constituent authorities of the new MSA.

6. Community empowerment

Base Proposal

- Maintains a foundation of existing governance arrangements in each of the unitary councils enabling a transition to the new arrangements set out in the English Devolution and Community Empowerment Bill being enacted.
- Enables a Local Government Boundary Commission review of ward boundaries to be undertaken after Vesting Day.

Modified Proposal

- Protects existing parish and town council arrangements.
- Enables existing partnerships to form the basis of Neighbourhood Networks, ensuring further community empowerment.



PART TWO

Our case for change

In the second part of our proposal we set out how our four unitary solution for Devon will best meet the Government's criteria for local Government reorganisation:

Criteria 1: Establishing a single tier of local Government

Proposals should:

- create a single tier of local Government across the area
- be based on sensible geography and economic viability
- be supported by robust evidence and expected outcomes.

Criteria 2: Efficiency, capacity and withstanding financial shocks

New councils should:

- improve efficiency and resilience
- be the right size to improve financial stability.

Proposals should show how transition costs and existing council debt will be managed.

Criteria 3: High quality and sustainable public services

Proposals should show how reorganisation will:

enhance public service delivery

- avoid fragmentation
- improve outcomes in key areas like social care, children's services, and public safety.

Criteria 4: Working together to understand and meet local needs

Proposals must show how councils have meaningfully collaborated and engaged. They will reflect community identity and show how we have addressed public concerns.

Criteria 5: Supporting devolution arrangements

Proposals should enable devolution. They should give details of how governance structures will adapt to support strategic authorities.

Criteria 6: Stronger community engagement and neighbourhood empowerment

Building on existing arrangements, proposals will include strong community involvement and neighbourhood empowerment.

PART TWO

Criteria 1: Establishing a single tier of Government

Our proposal sensibly reflects Devon's geography, topography and ways of life – three coherent economic areas aligned to key corridors and one larger rural council. It provides a credible single tier local Government solution to Devon's unique mix of coastal, urban and rural communities.

Torbay, Plymouth and Exeter will be empowered to lead on urban priorities while the new Rural Devon Coast and Countryside Council can focus on the distinct needs of dispersed rural communities, market towns and villages.

The proposed solution reflects functional economic areas, travel to work zones, and community identities, avoiding artificial boundaries that fragment service delivery. It ensures that planning, housing, transport, and economic growth are aligned with how people actually live and work. It avoids fragmented governance that hinders housing delivery because it allows councils to plan across coherent housing markets and infrastructure corridors, rather than negotiating across disconnected jurisdictions.

This section addresses the Government's first criteria for unitary local Government, which looks to establish an effective and efficient single tier of local Government for all of Devon.

Criteria la: Sensible economic areas, with an appropriate tax base, which does not create an undue advantage or disadvantage for one part of the area.

Criteria 1b: Sensible geography which will help to increase housing supply and meet local needs.

Criteria 1d: Effective structures to deliver outcomes for our communities.

We address **criteria 1c** – 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 – throughout this proposal.

Coherent and strategic planning for growth

Our proposal provides a credible single tiered local Government solution to Devon's unique mix of coastal, urban and rural communities. Four functional areas avoids the remoteness of an oversized authority and the cost and fragility of multiple smaller councils.

This Devon-wide structure ensures coherent and strategic planning for growth, housing and infrastructure across urban and rural contexts. Local Government reorganisation (LGR) presents a unique opportunity to design a system that reflects Devon's four functional economic geographies and will allow them to thrive. With streamlined governance, the new unitary councils can better serve their communities by speeding up housing development, upgrading infrastructure, and promoting inclusive economic growth county wide.

The model leverages the unique economic identities, strengths and connectivity of each area, enabling sustainable development and maximising the impact of Devon's resources. It aligns how people actually live their lives, reflects travel to work and housing market areas, and enables services to be provided in ways that more proactively support growth, regeneration and access to health and social care.

Torbay has a strong economy with traditional sectors such as tourism, construction, fishing and healthcare as well as high growth sectors including advanced manufacturing, photonics and micro electronics, supported by the established

Torbay Hi-Tech Cluster and the growing Torbay Creative Cluster. Although traditional sectors such as tourism are often lower paid seasonal employment, they are essential in supporting growth and the wider economy. To ensure the resilience of Torbay's economy, we will continue to focus on driving economic growth through supporting highgrowth and traditional sectors, creating spaces and support for businesses to develop such as through employment space at Torbay Tech Park and our business support programmes. By levering Torbay's unique coastal setting to boost the economy and attract a strong workforce through improving education, training and affordability, Torbay can turn the challenges of the economy into opportunities for growth.

Plymouth is at the heart of the national defence, marine autonomy and wider growth ambitions for the South West region delivering long term opportunities for young people. This proposal provides a firmer foundation to drive forward the Government's objectives within its Defence Industrial Strategy.

The proposed expansion of Plymouth City Council builds on the existing innovative strategic planning approach through the Plymouth and South West Devon Joint Local Plan, which already demonstrates successful collaboration across Plymouth and the communities of South Hams. The expanded council will deliver integrated and effective local governance to the people of Plymouth and the surrounding areas that already naturally function as part of the Plymouth housing and economic area.

Exeter is one of the fastest growing economies in the country, and the main growth hub for the South West, with specialisms in science, tech, big data, and significant assets, such as higher and further education institutions, which are vital to skills generation, innovation and productivity growth. 50% of Exeter's workforce live outside of the city, so the connection between the city and its rural communities is vitally important.

Rural Devon is not merely a picturesque backdrop to the County and the south west region, it is a dynamic, resilient economy with national significance. Anchored by globally competitive sectors such as agri-tech, clean energy, and advanced manufacturing, rural Devon contributes £20.6 billion to the UK economy while driving innovation founded on place based strengths. Its natural capital is unmatched: from the biosphere reserves of North Devon to the productive farmland and coastline that support thriving food, drink, and tourism industries. These assets are leveraged by a growing ecosystem of small and medium sized enterprises, research institutions, and community enterprises that are pioneering sustainable practices and circular economy models.

Connectivity is improving, with strategic investments in digital infrastructure and transport links enabling rural businesses to scale and export. The region's workforce is skilled, adaptable, and increasingly supported by targeted education and training aligned to local growth sectors.

Importantly, Devon is central to the UK's transition to net zero, food security, and regional rebalancing. Its clean energy potential, including offshore wind and green hydrogen, positions it as a future energy hub. Its defence and aerospace supply chains, clustered around key sites, are vital to national capability.

A key consideration in defining unitary proposals is the ability to promote economic growth in the County. The fastest growing sectors across the region are around digital technologies, professional services, specialised manufacturing, environmental science, advanced engineering, and healthcare.

Recognising Devon's distinctive identity and economic growth potential is vital to forging a path to a new economy that offers genuine opportunities for access and advancement to all residents. The principle of inclusive growth is central to our plans for the whole of Devon and the wider region.

Our configuration aligns with functional housing market areas and travel to work patterns around Exeter, the Plymouth Growth Area and Torbay as a compact coastal conurbation. It enables coordinated planning and delivery across strategic sites and infrastructure corridors, improving performance against the Housing Delivery Test and focusing scarce planning capacity where it has most impact. The approach creates simple, accountable footprints with clear responsibility for delivery.

Meeting the housing needs of our communities

Simply put – the four unitary solution reflects the needs of people across all of Devon. Its configuration is built around the principle that local Government should be able to respond flexibly to where need and demand for services is highest. For Devon, this involves key focuses on adult social care, children's services, housing, economic growth and regeneration, and public health.

Our proposal supports high quality, locality based services by implementing structures which best reflect the distinct profiles of our areas. It supports a more tailored service model which is responsive to the urban contexts of Exeter, Plymouth and Torbay and the rural context of Devon. It avoids unnecessary fragmentation by building on the proven track record of existing unitary councils serving Plymouth and Torbay, while ensuring that the new unitary councils are operationally viable. It equitably distributes resources aligned to an even distribution of demand, with the aim of consistent services for all Devon residents.

With housing being a critical factor to improving the health and wellbeing of our residents, a single system of local Government for Devon will enable better coordination of housing supply across the County, especially through the expanded Exeter and Plymouth boundaries.

Despite best intentions from all parties, the existing dynamics of local Government can sometimes ultimately fail the people it serves. This proposal provides the opportunity to tackle piecemeal housing strategies that do not meet demand. The new configuration – by design rather than inherited geography – will align housing targets with infrastructure and employment planning, ensuring delivery is both strategic and locally responsive. The four unitary solution represents a sensible geography that will help increase housing supply to meet local needs. Geography alone won't solve the acute housing crisis those seeking a home in Devon face.

The 2023 Housing Delivery Test confirms that most Devon councils (except Torbay) have consistently exceeded their targets in recent years.

	Total number of homes required	Total number of homes delivered	Housing Delivery Test measurement (Homes delivered/Homes required)
Expanded Exeter	3,554	3,851	108%
Expanded Plymouth	2,518	2,836	113%
Torbay	1,549	1,024	66%
Rural Devon Coast and Countryside	6,589	6,963	106%

Table 2. Housing Delivery Test 2020/21 to 2022/23

Despite progress, the Devon Housing Commission highlights the acute housing crisis in Devon, noting that while delivery is high, affordability and access remain problematic,

especially in areas like Torbay and rural communities. Issues include acute shortages of affordable homes for both ownership and rent, a lack of social housing (with delivery rates below national averages) and the impact of short term lets on local housing supply.

The Commission's recommendations for Devon include overcoming fragmentation, boosting affordable housing, and empowering local authorities. The proposed four unitary solution directly addresses these points by:

- Building on the work of the Devon and Torbay Combined County Authority (DTCCA) and creating governance structures that match economic, and housing geographies bespoke to Devon; providing a stepping stone towards a Mayoral Strategic Authority (MSA).
- Enabling strategic planning and delivery at scale, but with local responsiveness.
- Supporting targeted interventions in areas of greatest need.
- Enhancing accountability, financial resilience, and community engagement.

The Plymouth and South West Devon Joint Local Plan area has a strong track record of providing a housing supply to meet local needs. It has already delivered 113% against Government housing targets 2020-21 to 2022-23. The authority has been driving its Plan For Homes scheme, aiming to deliver 5,000 homes over a five year period on its current footprint, including more homes for social rent and low cost home ownership.

Despite success with demand outstripping supply, an extended boundary would help meet community need. Some 41% of residents in Plymouth currently live in either social or private rented homes in the council's current boundaries despite strategies being deployed to address urban deprivation and stimulate economic growth.

The Plymouth Housing Market Area and Needs Assessment has demonstrated significant unmet housing needs in the sub-region. Both the Sherford and planned Woolwell urban extensions, located in South Hams, have been required primarily to meet housing needs in the city. Even with this development, there remains significant unmet need in the sub-region. Combined, these challenges highlight the need for strategic planning and integration to address the housing crisis in Plymouth and its surrounding areas.

Exeter faces rapid population growth (5.9% against the UK average of 3.8%) and increasing demand for affordable housing and sustainable transport. This proposal will enable the new Exeter Council to accelerate housing delivery, support its vibrant labour market, and invest in infrastructure that underpins both economic growth and the needs of its growing young professional and student population.

The Exeter Housing Market Area closely matches the local economic market area, both of which align with the growing travel to work area – the second largest in England after Cambridge. Cross district collaboration supports strategic planning beyond Exeter's current

administrative boundary, as shown by current development strategies. The Exeter Plan includes 14,000 new homes within the city by 2041, while Teignbridge and East Devon have designated areas on the city's outskirts for 30,500 more homes. These neighbouring developments functionally extend the city, with many residents considering Exeter their home.

As a continuing authority, Torbay Council will be enabled to continue and further build its momentum around addressing urban deprivation and an ageing population with targeted regeneration and economic growth strategies. By tailoring investment and service delivery to local needs and industries, Torbay has demonstrated it is fiscally responsible and well positioned to unlock economic potential in the face of high deprivation levels and support sustainable housing development that meets the needs of its residents.

Analysis of the three baseline forecasts of the main forecasting houses (CE, OE and Experian) indicates a predicted 6,730 jobs growth in Torbay over the 2022 to 2040 plan period. Torbay's Economic Development Needs Assessment suggests no uplift to the former minimum Local Housing Need as it stood at 2023 is considered necessary or necessarily desirable to support an explicit balance between jobs and homes.

Torbay's most recent Housing and Economic Needs Assessment (2021) identifies a need for 720 affordable homes per year, reflecting acute local demand. However, delivery is constrained by limited viable land, strong environmental protections, and flooding risks. Expanding Torbay's boundaries into neighbouring areas such as South Hams or Teignbridge would not resolve these challenges, as those areas also face significant constraints.

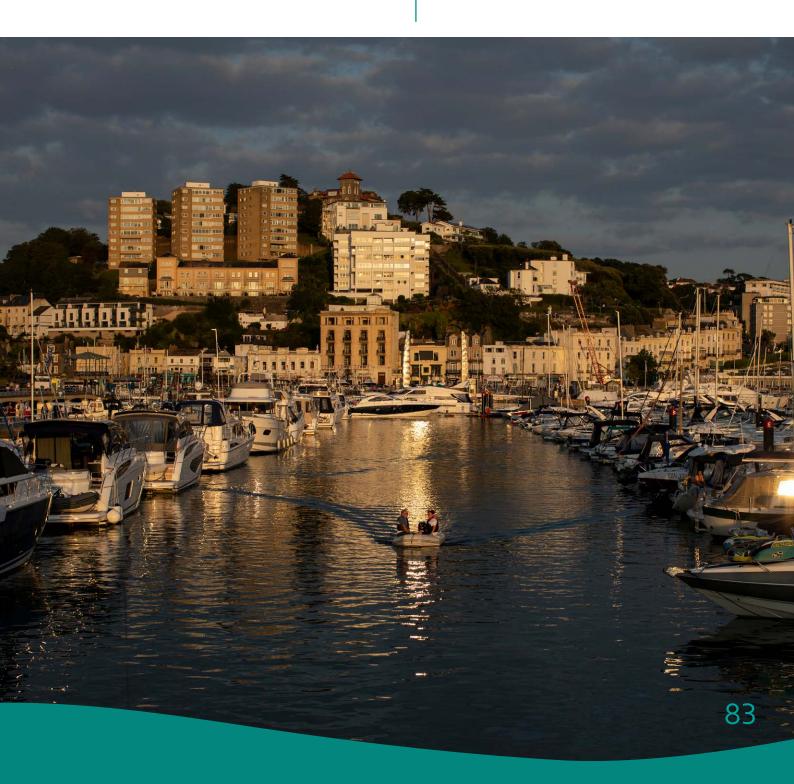
Whilst Torbay's Local Housing Need is high relative to its land supply, alternative solutions are being pursued. This includes a brownfield-first strategy anchored in town centre regeneration, intensification of underused sites and our innovative Hotels to Homes programme, complemented by active homelessness prevention and specialist housing pathways. These measures provide a credible, locally led route to meet need whilst adhering to nationally significant environmental constraints.

The new Rural Devon Coast and Countryside Council would provide a strategic platform for economic growth and housing delivery tailored to the unique challenges of coastal, moorland, and agricultural communities. By aligning governance with local economic identities and needs, the model enables sustainable growth and ensures that rural Devon can thrive alongside its urban counterparts, with housing solutions that reflect local demand and opportunity.

The council would work with the other three unitary councils to manage resourcing and skills gaps in planning that slow housing delivery. It would need to develop a strategy for housing and homelessness that is centred on its rural geography, using the best examples including the blueprint provided by the Devon Housing Commission, combined with a locally determined approach to needs. Community engagement via the locality model proposed will be essential to developing truly local understanding of housing need and delivering effective, tailored solutions.

The greatest development potential in Devon lies in the areas surrounding Exeter and the eastern fringes of Plymouth, where land supply and infrastructure can support larger scale growth. The four unitary solution, working in partnership through an MSA, enables Devon to direct growth to areas with capacity, while Torbay focuses on regeneration, affordable housing, and meeting specialist needs within its unique constraints.

Meeting Devon's housing targets requires a strategic, county wide approach. The four unitary solution, underpinned by a Spatial Development Strategy led by the MSA, will enable coordinated plan making, infrastructure investment, and delivery across functional housing market areas. This approach aligns with Government criteria for "sensible geography" and ensures that housing need is met through collaboration, not just boundary change.



CASE STUDY

How Torbay Council transforms Hotels to Homes



With little or almost no affordable housing available throughout Torbay, along with a lack of greenfield and brownfield sites, we needed to find another way to create affordable homes for our residents.

With the closure of large hotels in prime locations, we decided to work with developers to turn them into affordable housing for local key workers and those with the highest housing need.

Torbay has lots of hotels, often in lovely locations, that are no longer operating and have been left empty for long periods of time. Many of these buildings are from the Victorian era and are stunning properties that would make ideal living accommodation.

£3 million from our Levelling Up Partnership with Government helped us turn some of these 'Hotels to Homes' and bring affordable housing to those with the highest need.

Working together with the private sector, taking a turnkey approach, we have turned our first project around quickly, meeting extremely tight deadlines. We

found a hotel in the centre of Torquay which already had planning permission and a developer who was keen to get the project started. By working with the developer and committing to buying all the accommodation in one go, both parties have saved on multiple legal fees, with no need for an estate agent, and the developer has a guaranteed buyer. We have also agreed to a bulk purchase discount.

Our involvement in this development has meant that we can achieve a higher standard of accommodation. This includes a fire suppression system, EPC Level B, low carbon heating, solar panels and electric vehicle charging points – as well as space for a shared garden.

What this old hotel has given us is 14 individual units comprising flatlets, one-bedroom flats, and two-bedroom flats. It accommodates single people, couples and families right in the centre of the town whilst also enjoying being a stone's throw from our beautiful seafront and beaches.

This blueprint project was the first in our Hotels to Homes programme with further projects already underway. We are investing in our housing and our local people to give our residents somewhere they can truly call home.



Targeted service delivery

Each unitary council will be equipped to lead on place based investment and service integration, ensuring that urban centres like Exeter, Plymouth and Torbay can drive innovation and productivity, while rural Devon benefits from tailored solutions to its distinct rural challenges. This structure avoids the risks of economic incoherence and diluted accountability that can arise from broader, less differentiated models or a one size fits all.

Under the four unitary solution each council will focus on its own demographic and service pressures whilst sharing and collaborating on key issues and services where this is a fiscal or rational demand. For example, Torbay and Plymouth will continue to directly address urban deprivation, health inequalities, and ageing populations through measures such as integrated care models and targeted regeneration. In Exeter, the new council would be uniquely positioned to respond to the city's rapid population growth and its role as a regional economic powerhouse.

Targeted service delivery ensures that councils can respond effectively to the distinct challenges and opportunities within their areas. It avoids the inefficiencies and mismatches of one size fits all governance because each authority can design and deliver services that reflect local demographics, economic conditions and community expectations. This leads to better outcomes for residents, more efficient use of public resources, and stronger accountability to local priorities.

For example, Torbay Council has commissioned a Multiple Complex Needs Alliance through an Alliance Agreement to better respond to and meet the needs of those who experience homelessness, drug and alcohol problems, and domestic violence or abuse.

By configuring services around people – some of the most vulnerable members of our community – rather than expecting them to navigate three different services results is collaborative provision. This means we understand what matters most to people who use the services while at the same time improving the experience, quality and outcomes of the integrated offer.

Plymouth's comprehensive reablement programme is working to transform how Adult Social Care supports people to regain their independence. The programme focuses on remaining independent and effective self led life assessment, moving away from traditional service dependent models towards community based approaches that prevent escalation of need and reduce reliance on statutory services.

Through collaborative working between Livewell Southwest, Plymouth City Council's Place Directorate, and other partners, the programme strengthens connections between what services can do for people and what individuals can see they could do differently. This approach aims to maximise independence and the efficiency of existing services whilst improving long term outcomes across reablement, community outreach, independence at home service, and technology enabled care.

Ensuring a fair and sustainable tax base

Each proposed unitary council has a balanced and sustainable tax base, avoiding undue advantage or disadvantage for any area whilst retaining Devon's sense of place in both rural and urban areas. This supports financial resilience and equitable service delivery. It avoids fiscal imbalance that could lead to service cuts or unequal investment because each unitary is designed to have sufficient revenue capacity to meet local needs without over reliance on central Government support.

The four unitary solution has been specifically designed to align with the distinct needs of Devon's communities. The Chief Financial Officers from Devon's two current unitary councils have collaborated closely with their counterpart in Exeter and sought input from independent financial consultants. This partnership has ensured that financial assessments are robust and representative of coherent economic areas, thereby supporting the establishment of a suitable and balanced tax base across the four new councils.

While the model presents challenges and will require a drive towards efficiencies particularly in rural Devon against the current County Council remit, it is structured to avoid creating regions with undue financial advantage or disadvantage. The proposed approach prioritises fairness and sustainability, ensuring that all areas benefit from appropriately allocated resources and that no community is left behind as Devon transitions to this new governance framework.

- LGR brings a chance for £38 million of savings to be made against current arrangements.
 Collaboration will lead to further savings.
- It's a prudent forecast that is less than 2% of the total baseline spend.
- By year 3, organisations will have offset the initial costs of reorganisation
- The tax base shows a fairer and more equitable arrangement for communities across Devon with council tax base per head of population much more balanced and with a smaller range across the four unitary councis. (as shown in Figure 2).

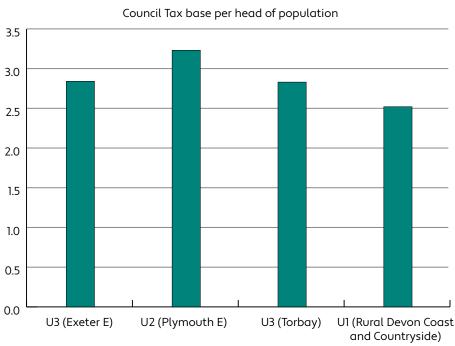


Figure 2. Council tax base per head of population in the four unitary solution.

Criteria 2: Efficiency, capacity and withstanding financial shocks

Our proposal delivers a robust and sustainable framework for public service delivery across the County. By aligning council structures with coherent economic and geographic areas, the model avoids the pitfalls of over centralisation and fragmentation, instead enabling tailored responses to local needs.

It builds on the proven track record of the two unitary authorities, the growth and ambition of Exeter, and the opportunity to deliver a fit for purpose rural unitary council that drives efficiencies from the outset. It ensures that each new authority is a viable size to deliver services effectively, withstand financial shocks, and operate within a balanced and sustainable tax base.

The model supports transformation through shared services, streamlined leadership, and targeted investment. It demonstrates how the four unitary solution lays the foundations for smarter, more responsive local Government that delivers best value for Devon's communities.

This section addresses the Government's second criteria for unitary local Government – with local authorities being the right size to achieve efficiencies, improve capacity and withstand financial shocks.

Criteria 2a and 2b: The right population size for the area.

Criteria 2c: Improving council finances through efficiencies and providing best possible value for money.

Criteria 2d: Managing transition costs and planning for future service transformation opportunities.

Criteria 2e and 2f are not applicable in Devon as no councils are under Best Value Interventions or receiving Exceptional Financial Support; or have failure linked to capital practices.

The right size for Devon

The four unitary solution is about shaping a brighter future for Devon – one that balances the benefits of working together with the need to stay close and responsive to our communities. While it doesn't follow the guideance of aiming for councils with populations of 500,000, this approach is designed to make local Government more efficient, flexible and stable. It's a plan that values local knowledge, builds on what already works well and gives residents a say in how services are delivered – ensuring Devon remains both strong and uniquely itself.

With the sizes proposed for each unitary council in Devon, the model delivers:

- Proven financial savings and transformation.
- Sensible geographies and economic cohesion.
- High quality public services tailored to local needs.
- Strong foundations for devolution and strategic collaboration.

The four unitary model takes what already works well in Plymouth, Torbay and Exeter and builds on it, making sure we don't lose sight of the things that matter most to local people. By learning from their successes, this approach keeps disruption and risk to a minimum and makes sure the needs of urban, rural and coastal communities are properly understood and looked after.

It maintains essential services such as adult social care, children's services, and SEND, ensuring continuous support for vulnerable populations. Ongoing improvements in Plymouth and Torbay will continue uninterrupted, though local Government

reorganisation (LGR) will also drive broader positive change. Torbay and Plymouth are not competing hypothetical theories of unproven local Government design. The work we have undertaken with PeopleToo shows credible evidence that these smaller unitary authorities deliver for the populations they serve.

The four unitary solution has been designed to balance operational scale with local responsiveness, ensuring the new councils are large enough to be efficient whilst sized to be visible and accountable. By designing, rather than inheriting boundaries, councils can deliver services efficiently, withstand financial shocks, and maintain a clear connection to the communities they serve.

Our proposal provides the ideal foundation for meaningful devolution and effective strategic alignment across the region. Each of the four councils is sized to support robust local governance and facilitate engagement with the proposed Mayoral Strategic Authority (MSA). This model directly supports the Government's ambition to transfer decision making and resources away from Westminster, empowering communities at a local level.

- Viable and Resilient Councils: Each of the proposed unitary councils is financially viable, organisationally resilient, and strategically positioned to meet both current and future challenges.
- Regional Collaboration with Local Distinctiveness: The four unitary solution strikes a balance between regional collaboration and safeguarding the unique characteristics of each locality. It avoids the pitfalls of a one size fits all approach, ensuring that local priorities

are not diluted within a larger, less responsive structure. Notably, the rural authority represents circa 56% of the land area, preserving and amplifying the importance of vital agricultural and environmental interests.

- Effective Engagement with National Programmes: This model enables coherent and coordinated engagement with national funding streams, policy initiatives, and programmes. Councils are positioned to bid for national initiatives.
- The right size for success: Our region's track record is already distinguished by ongoing and successful transformation. The four unitary councils are the right size to deliver efficiencies, improve organisational capacity, and withstand financial shocks. Unlike larger, more remote structures, this model preserves the ability to address unique local needs, particularly in areas like Torbay, where a population of 138,400 would risk being subsumed within a 500,000+ catchment. Torbay alone welcomes over 4.5 million visitors annually, swelling the population and contributing £410 million to the local economy – figures that highlight the necessity for tailored governance.
- Distinct Needs: With projected population growth of 8% by 2030 and a tourism sector that supports 8,000 jobs, Torbay's requirements differ markedly from sister councils. Its strong balance sheet and history of transformation underscore its ongoing viability and resilience.
- Shared Services and Growth Opportunities: Existing partnerships, such as SWISCo (Torbay Council's wholly owned company which delivers essential environmental and infrastructure services), are projected to deliver £4.2

- million in efficiency savings over the next three years. These platforms enable future growth and innovation across the authorities.
- Forward Plans: Plymouth, Exeter and Torbay each have a clear and compelling vision for continued progress for their communities. Under the springboard of LGR it will open up opportunities for Devon's urban councils and provide bespoke forward planning for Devon's rural communities.

The transition to a four unitary solution is one that is built for Devon, by Devon. It offers a sound, compelling, and locally grounded alternative to a remote mega council, and it deserves thoughtful consideration as Devon's answer to LGR as the region moves forward with reorganisation.



Delivering equitable value beyond scale

The financial case for Devon is robust, with a high level summary as follows:

- £22 million in initial organisational savings.
- £36 million in service savings, achievable by year five.
- £52.5 million of transition costs, carefully managed and lower for Plymouth and Torbay, where there is minimal or no change.
- Payback of transition costs by year 3 of implementation.

Efficiencies are identified through:

- Optimised leadership structures, reducing duplication.
- Proportionate workforce reductions.
- Rationalisation of service delivery based on benchmarking against council type and Devon-wide averages.

Leveraging shared services using organisations such as SWISCo (Torbay Council's wholly owned company which delivers essential environmental and infrastructure services) and existing transformation programmes.

This approach ensures taxpayers receive the best possible value for money, and councils are placed on a firmer financial footing without relying on central debt relief.

Transformation is not a future aspiration – it is already underway. The four unitary solution accelerates and scales existing plans, with invest to save opportunities supported by flexible use of capital receipts.

Work was commissioned through Pixel Financial Management to provide estimates of funding for 2026/27 across the four councils, with comparisons for business rates income, council tax income and grant income per head of population. Figure 3 shows a summary of this funding per head for each proposed council.



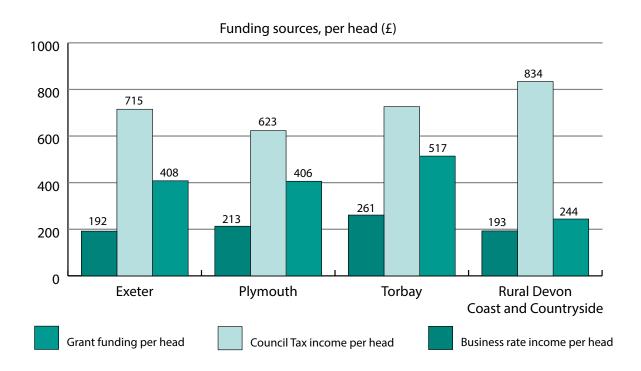


Figure 3. Funding sources per head of population.

The analysis shows that the four unitary solution improves the balance across all councils and is financially viable when compared with the share of population across the four proposed councils. Tables 3 and 4 summarise the results with the focus on total resources per head. Table 3 shows the figures for the existing councils without any changes (i.e. our Base Proposal) and Table 4 reflects our Modified Proposal.

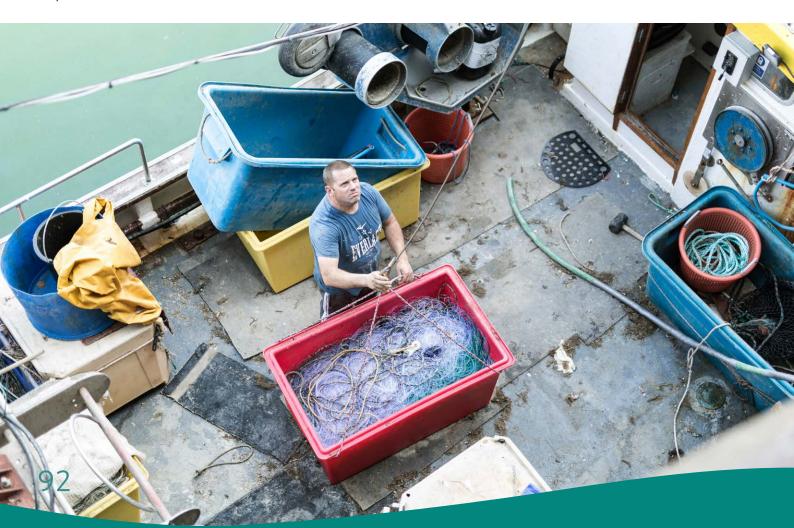
	Exeter	Plymouth	Torbay	Devon	Total/average
Total net	£155m	£343m	£209m	£905m	£1,612m
resources					
Total	131,000	270,000	140,000	709,000	1,250,000
population					
Population	10%	22%	11%	57%	100%
share					
Resources	£1,130	£1,276	£1,501	£1,299	£1,298
per head of					
population					
Resources	10%	21%	13%	56%	100%
share					

Table 3. Base Proposal - share of population and resources (2026/2027).

	Expanded Exeter	Expanded Plymouth	Torbay	Rural Devon Coast and Countryside	Total/ average
Total resources	£341m	£380m	£209m	£682m	£1,612m
Total population	260,000	300,000	140,000	550,000	1,250,000
Population share	21%	22%	11%	43%	100%
Resources per head of population	£1,314	£1,242	£1,501	£1,271	£1,299
Resources share	21%	24%	13%	42%	100%

Table 4. Modified Proposal - share of population and resources (2026/2027).

In the proposed four unitary solution, resources per head is highest for Torbay and lowest for Plymouth, with Torbay continuing with a share of resources that exceeds its share of population. The other councils all have reasonably close alignment between share of population and share of resources, with the exception of Exeter which has a 1.5% lower share of funding compared with population, suggesting financial challenges without any expansion.



Investing in transformation across Devon

Service and organisational savings

There are initial organisational wide savings and service savings to be made if local Government in Devon is reorganised based on this proposal. This would reduce the baseline cost figures of just over £2 billion, as shown in Table 5 and modelled against the four proposed unitary structures.

	Expanded Exeter £000	Expanded Plymouth £000	Torbay £000	Rural Devon Coast and Countryside £000	BASELINE TOTAL £000
Education Services	158,214	150,106	79,872	328,662	716,853
Highways and Transport	8,366	9,217	6,700	25,660	49,943
Children's Social Care	62,899	92,845	48,954	130,662	335,360
Adults Social Care	124,782	138,665	67,963	259,214	590,624
Public Health	12,405	19,642	11,439	25,769	69,255
Housing Services	6,705	9,123	6,902	9,551	32,281
Cultural and Related Services	12,705	12,070	3,021	14,144	41,940
Environmental and Regulatory Services	31,190	23,789	15,132	65,409	135,519
Planning and Development Services	-1,484	-8,844	1,850	10,816	2,338
Central services	8,841	8,571	8,693	16,555	42,660
TOTAL BASELINE COST OF SERVICES	424,622	455,184	250,526	886,441	2,016,773

Table 5. Service costs – summary 2025/26 Revenue Account baseline costs

The Chief Financial Officers across Devon have worked to model transformation and invest to save opportunities (see Appendix 2). This work has been supplemented and supported by independent financial consultants.

It is estimated that almost £22 million of organisational savings can be made across the four councils, with a further circa £36 million in service savings that can be made because of the new configuration.

Details of the organisational savings are shown in Table 6.

Savings category	Description	Estimated savings
Right sizing the organisation	Determining the right size of the organisation, proportionate to the services that are being delivered, offset by the costs of innovative technology and upskilling individuals. Reducing overall workforce through role consolidation and automation.	£10m
Optimising Leadership	Reviewing the number of managerial roles to eliminate duplication and enhance operational efficiency and reviewing the costs of democratic services (elections, committee support, etc.) to be proportionate to the new authority	£6m
Consolidating Corporate Services	Consolidating back office functions, such as Human Resources, Finance, and Information Technology to streamline operations, enhance efficiencies and unlock savings.	£2m
Improved Digital and IT Systems	Implementing unified digital platforms, automating repetitive tasks, streamlining workflows, and eliminating manual processes can lead to considerable time and cost savings. Unified platforms and systems rationalisation reduce licensing, support, and admin overheads.	£3m
Asset and Property Optimisation	Reviewing the property portfolio to ensure alignment with the council's overall objectives and community needs.	£lm

Table 6. Forecasted organisational savings.

It is estimated that significant baseline costs can be reduced through delivering services differently across a four unitary model. These service savings have been estimated using information from Revenue Outcome and Revenue Account forms and applying various methodologies to inform the estimates.

Service savings methodologies include:

- Service area costs analysed into employee costs, running costs, fees and charges and other incomes to inform the potential level of savings across headings based on local knowledge.
- Potential savings calculated if all Devon councils with higher costs were to reduce those costs to council type average.
- Potential savings calculated if all Devon councils with higher costs were to reduce those costs to Devon average.

Proxies used for each type of costs.

Table 7 shows how the baseline figures are estimated to change under the new configuration and provides a summary of estimated savings against each service area.

	BASELINE TOTAL	Revised Total (after savings)	Estimated notional savings	Percentage of total service savings
	£000	£000	£000	
Education Services	716,853	716,853	0	0%
Highways and Transport	49,943	47,189	-2,754	8%
Children's Social Care	335,360	325,299	-10,061	28%
Adults Social Care	590,624	578,812	-11,812	33%
Public Health	69,255	68,562	-693	2%
Housing Services	32,281	31,322	-959	3%
Cultural and Related Services	41,940	40,147	-1,793	5%
Environmental and Regulatory Services	135,519	132,134	-3,385	9%
Planning and Development Services	2,338	1,559	-779	2%
Central Services	42,660	39,190	-3,470	10%
TOTAL BASELINE COST OF SERVICES	2,016,773	1,981,068	-35,705	100%

Table 7. Forecasted service saving.

These are felt to be prudent estimates and in general represent between 0.5-2% of operating costs and/or income levels where appropriate. Total estimated savings are less than 2% of the total baseline service spend across the region.

Reasonable checks have been undertaken, particularly where significant savings are estimated such as the £18 million of savings across children's and adult social care services.

Current benchmarking data shows Devon County Council with a high unit cost for adult social care services at £606 per head. Figure 4 shows how councils compare when you correlate adult social care spend per head with the Fair Funding relative needs formula for adult social care spend estimated for 2026/2027. The table shows Devon spend exceeding the expected spend/need level with Plymouth and Torbay being below the line of best fit.

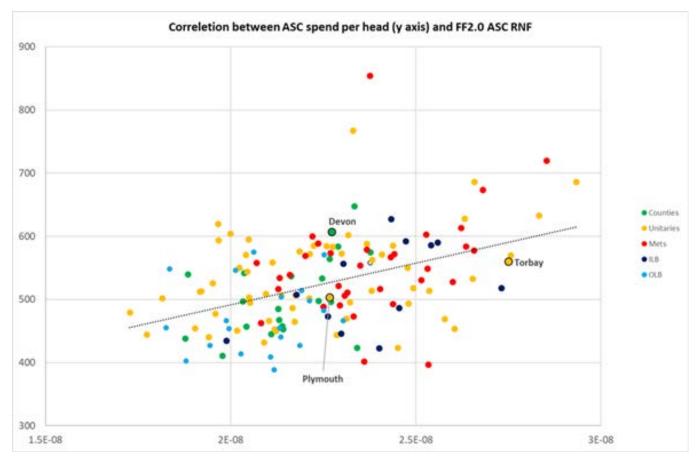


Figure 4. Correlation between adult social care spend and Fair Funding relative needs formula

Reducing the unit cost across Devon to the same level as Torbay Council, at £560 produces an estimated saving of circa £30 million, based on current service demand. This would be challenging but shows there is significant potential, particularly as Torbay has commenced a programme of transformation within its adult social care services to manage demand and costs further. This therefore supports the estimate of £12 million for adult social care savings used in this model.

Using a similar approach, Figure 5 shows the correlation between children's social care spend per head and the Fair Funding relative needs formula proposed for 2026/2027. It shows that service costs for all three of the current upper tier councils are above the assessed relative needs level and therefore suggests significant savings are possible through efficiencies and further focus on prevention.

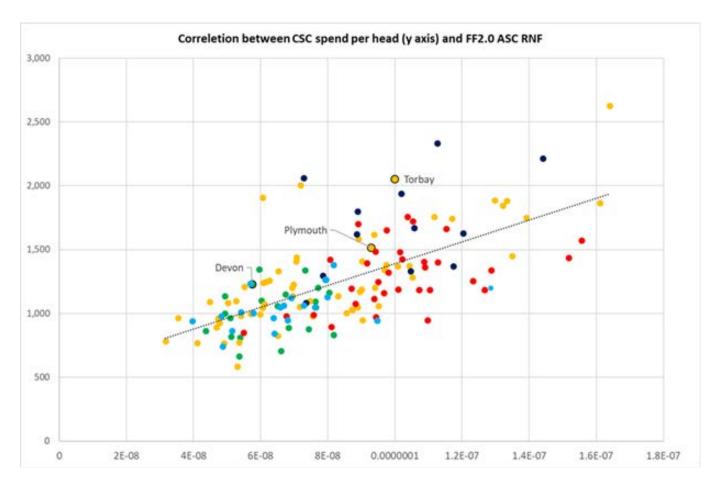


Figure 5. Correlation between children's social care spend and Fair Funding relative needs formula

The transition to a new four unitary council model represents a bold investment in Devon's future, with each cost category supporting a strategic step towards a more efficient, resilient, and responsive local Government.

Transition costs

The associated costs are necessary to facilitate the longer term benefits and enact local Government transformation in Devon. Minimal costs have been estimated relating to the expansion of Plymouth and no costs relating to Torbay Council, which would remain unchanged.

Total transition costs are estimated to be £52.5 million with approximately half of

the overall transition costs associated with workforce exit and one off redundancy and termination costs.

Costs incurred by a shadow authority prior to Year 1 of a new authority will form part of the existing cost envelope and be brought forward. Funding would need to be identified and agreed collectively by the existing authorities working in their shadow authority roles. This is likely to include the use of reserves and flexible use of capital receipts.

The estimates for the transition costs are set out in Table 8 together with the rationale for those costs.

The estimated transition costs outlined are not just expenditures – they are targeted investments in Devon's future. Each category supports a critical aspect of organisational transformation, from renewing the workforce and building new capabilities, to modernising infrastructure and engaging and empowering communities – all of which the public deserves.

With careful management and a clear strategic vision, these investments will enable all the unitary councils to deliver high quality, efficient, and sustainable services for years to come. We believe this is the fundamental shift that Government and the public have been asking for.

Cost Category	Amounts	Summary	Rationale
Enabling organisational renewal	£25.2m	Compensation paid to employees as a result of restructuring to enable the transition to leaner, more agile structures, unlocking long term efficiencies	A decisive move to reshape organisations, ensuring that the new authorities are staffed with the right skills and capacity for modern service delivery. This investment enables the transition to leaner, more agile structures, unlocking long term efficiencies and creating opportunities for new talent and innovation.
Service change initiatives	£6.0m	Invest to save costs to deliver future savings (less than 20% of estimated service savings)	Initial investment designed to facilitate and accelerate the realisation of savings, delivering benefits to residents as soon as possible.
Ensuring a smooth transition	£5.4m	Transition programme team including legal services, human resources, project and programme management, and specialist support.	Investing in a transition team reflects a commitment to professional programme management. By engaging legal, contractual, and project management specialists, the reorganisation is de-risked and guided by best practice, ensuring that the change is well coordinated and delivers on its objectives.

Modernising infrastructure	£3.1m	Alignment of systems and digital infrastructure, including data migration, commonality of cyber security, and training for new systems.	Investments in digital systems and estates and facilities will be required to modernise the councils' infrastructure, enabling more efficient service delivery and better use of resources. These upgrades lay the foundation for future innovation
	£2.5m	Reconfiguration of buildings, costs of disposal, and termination fees on leases.	and improved public services.
Processes and procedures	£2.4m	Harmonisation of processes to facilitate effective service transition.	Consolidating services within the new authorities – both back office and frontline – will ensure that efficiencies are realised and our communities can benefit from streamlined, easy to access services.
Building capability for the future	£1.7m	Upskilling and reskilling employees to adapt to new roles and responsibilities.	This proactive approach to workforce development supports career progression, fosters adaptability, and strengthens the overall capability of the organisation. It ensures that employees are fully equipped to thrive in new roles and responsibilities.
Engaging communities and the workforce	£1.3m	Development of communications, branding, training, and public information in relation to new authorities.	By prioritising clear communication, branding, and training, the transition will be understood and supported by both staff and the public, fostering a sense of shared purpose and positive momentum.
Sub-total	£47.6m		
Contingency	£4.8m	Prudent addition of 10% contingency on estimated costs above.	Maintaining a contingency demonstrates prudent financial planning, ensuring that the transition is robust against
			unforeseen challenges.

Table 8. Transition costs breakdown and rationale.

Financial sustainability

The savings and costs estimated and highlighted in this section have been profiled across future years to provide a ten year outlook and assess the financial feasibility of the proposal and the longer term benefits.

The analysis set out in Table 9 shows the estimated transition costs and notional savings projecting a payback period of between two to three years. From this point in time onwards the cumulative net savings exceed the transition costs.

Consolic costs an	lated d savings	Transition costs	Organisational savings	Service savings	Annual net impact	Cumulative net impact
Year 1	£000	26,332	-10,219	-1,890	14,223	14,223
Year 2	£000	18,067	-14,464	-5,669	-2,066	12,157
Year 3	£000	8,128	-17,294	-13,228	-22,394	-10,237
Year 4	£000	0	-20,124	-24,565	-44,689	-54,926
Year 5	£000	0	-20,124	-37,793	-57,917	-112,843
Year 6	£000	0	-9,974	-37,793	-47,767	-160,610
Year 7	£000	0	-9,974	-37,793	-47,767	-208,378
Year 8	£000	0	-9,974	-37,793	-47,767	-256,145
Year 9	£000	0	-9,974	-37,793	-47,767	-303,912
Year 10	£000	0	-9,974	-37,793	-47,767	-351,679

Table 9. Ten year outlook and pay back period.

The introduction of a four unitary council model is underpinned by a clear commitment to financial sustainability. By focusing on the effective delivery of savings, the new structure aims to reduce the overall cost base while maintaining high quality public services. This approach ensures that resources are used efficiently, enabling the authorities to operate within their means and provide long term value to residents. Through a combination of targeted investments and prudent financial planning, all of the unitary councils are positioned to achieve lasting stability and resilience in their financial operations.

CASE STUDY

Torbay Council redesign programme

We launched our council redesign programme in 2019. This is the biggest programme of change we have seen in a decade. It set out our aspirations to modernise, simplify, and standardise how we work to better serve our communities. The programme is building a resilient council by shifting our focus from internal processes to putting the customer at the centre of everything we do, every decision and every action.

The programme is working towards delivering a new Target Operating Model and has delivered new Public Affairs and Community Empowerment strategies, making sure we listen and act on what our residents tell us. We have created new flexible working spaces that reduce our office footprint and make our spaces more efficient and a nicer place to work.

We are now focussing on two major projects: Our Organisation and Our People. Our Organisation is working on reducing manual processes, increasing automation and realising efficiencies. It is delivering a new Customer Relationship Management (CRM) system, a Business Portal and Power BI dashboards. We are undertaking service reviews across the organisation which are delivering improvements. From this work, significant benefits have emerged, including our CRM system realising £1.7 million in savings over eight years. We have streamlined several of our services - resulting in our workforce being more agile, completing reports onsite, reducing duplications and improving service delivery. Just one example of the impact is the reduction of processing times on housing disrepair cases by 16 weeks.

Power BI is transforming our data management. Its interactive dashboards have removed the need for manual reporting, eliminating room for data error but most importantly revolutionising the way we use our information. This project has supported our Planning, Housing & Climate Emergency team to digitise paper applications which has improved public access and simplified conveyancing. It has meant our managers have access to real time data and are able to know exactly what the case loads are, if we are delivering and most importantly keeping on track for our customers.

The Our People project is delivering against a comprehensive People Strategy and is improving our engagement and recruitment. Workforce planning is focussing on future needs and targeting inefficiencies. Through delivering our Organisational Development Strategy we are promoting continuous learning, diversity, and inclusion. We have completely redesigned how we recruit. Our new applicant tracking system has done away with paper applications and manual sifting to a unified approach from application all the way through to induction. This has reduced our costs. freed up time for recruiting managers and improved the candidates' experience.

And our Relational Council initiative is fostering belonging, which has reduced HR involvement and improved staff wellbeing. Our Redesign Programme is increasing employee satisfaction, organisational agility and innovation. It's aligning our workforce with our strategic goals, which enhances service delivery as we continue our journey of transformation.



Criteria 3: High quality and sustainable public services

Our proposal supports high quality locality based services by implementing structures which best reflect the distinct profiles of our areas. It avoids unnecessary fragmentation by building on the existing capacity of the current unitary councils serving Plymouth and Torbay, while ensuring that the new unitary councils are operationally viable.

Central to our proposal is maintaining and improving services for the most vulnerable in our communities. Crucial services such as adult social care, children's services, SEND and homelessness are vital to ensure that all our residents have the best outcomes in life. The transformation and improvement journeys which are underway across Devon will continue, with the opportunities for further integration and transformation maximised.

There is a long history of shared and joined up services across Devon – at every current tier of local Government, with statutory partners and with the community, voluntary and social enterprise sector. We will build on our existing strengths and explore further collaborative working and joint commissioning. This model balances local responsiveness with the opportunity of longer term service budget savings through working together at the right level.

This section addresses the Government's third criteria for local Government reogranisation (LGR). New unitary structures must prioritise the delivery of high quality and sustainable public services.

Criteria 3a:

Improving local service delivery and avoiding unnecessary fragmentation of services.

Criteria 3b:

Delivering value for money through public service reform.

Criteria 3c:

Protecting crucial services

Distinct local needs

The four unitary solution reflects the needs of people across all of Devon. It is built around the principle that local Government should be designed around real places, communities and economies. This enables decisions to be made closer to the communities that our councils serve, resulting in services which are responsive to the different needs of different places.

It reflects the distinct profiles of the four areas in relation to high cost services, enabling local support dependant on need. It supports a more tailored service model which is responsive to the urban contexts of Exeter, Plymouth and Torbay and the rural context of Devon.

While Devon is associated with natural beauty and assumed prosperity, the reality for many residents is more complex.

Deprivation in coastal and rural areas is frequently less visible than in urban settings, but it is no less significant. Issues such as limited access to essential services, poor transport links, and digital exclusion can have a profound impact on quality of life, particularly for older people and those on low incomes.

Within the wider area, Plymouth and Torbay face the highest levels of deprivation. Both have significant concentrations of Lower Super Output Areas in the most deprived national deciles. This is coupled with higher levels of child poverty, higher levels of Free School Meal eligibility and lower life expectancy. Within the area to be served by the new Rural Devon Coast and Countryside Council there is much lower deprivation

overall, although rural poverty, low wages, and affordability pressures in housing, transport and connectivity remain significant.

There is higher household deprivation across multiple dimensions within Torbay (22%) and Plymouth (20.6%) compared with the existing Devon districts, though East Devon and Exeter also show significant challenges. 24.2% and 23.5% of families have relatively low incomes in Torbay and Plymouth respectively, showing that child poverty is more acute in these areas compared to the current Devon County Council area (18.6%). For both Torbay and Plymouth, these are above the South West and national averages.⁵

Many villages and hamlets across Devon face persistent barriers to accessing healthcare, education, and employment opportunities. Public transport is often infrequent or unavailable, making it difficult for residents without private vehicles to reach jobs, training or even basic amenities. Digital connectivity, while improving, still lags behind in some of the most remote areas, further isolating individuals and restricting access to online services and information.

Nationally, the Index of Multiple Deprivation shows that rural deprivation is often masked by averages, but pockets of significant need exist even in otherwise affluent counties. In rural Devon, the combination of low salaries, high housing and living costs, and additional fuel costs for both heating and transportation contribute to poverty, particularly in working households.

The Office for National Statistics also

⁵ Insights as per the 2019 Index of Multiple Deprivation (IMD). This document was produced before the release of the latest IMB on 30 October 2025.

highlights that economic inequalities are not just regional but can occur between neighbourhoods, with some rural and coastal towns among the most incomedeprived areas in England⁶. Life expectancy and healthy life expectancy gaps are largest in Plymouth, with up to 27 years difference for females between life expectancy and healthy life expectancy.

Economic inactivity among young people remains stubbornly high. In Torbay, only 55 per cent of care experienced young adults are in education, employment or training after school. Compounding this, many of those achieving strong GSCE results at Key Stage 4 relocate for work or study. This outward migration reduces local talent and weakens community resilience.

Education systems are under strain from widening gaps in exclusions and suspensions and the SEND agenda casts a long shadow over mainstream provision. Devon and Torbay both have higher proportions of children requiring special educational needs support than the national average. The result is a continued challenge on the Dedicated Schools Grant High Needs Block. Torbay is part of the Safety Valve programme and, although continues to make progress, this is within the context of a difficult national and local picture with increased complexity of need and a more fragmented school landscape.

Whilst Plymouth and Torbay's challenges around urban poverty, housing,

homelessness and multiple, complex health needs are fundamentally different to the issues facing rural Devon of low wages, connectivity and housing affordability, hidden poverty is a recurring theme in Devon's communities – and local Government reorganisation gives us the opportunity to tackle it.

The proposed reorganisation of local Government in Devon presents an opportunity to combat deprivation more effectively. By bringing decision making closer to communities and embedding mechanisms for local engagement, the new model aims to ensure that all communities are heard and that resources are targeted where they can have the greatest impact.

Strengthening collaboration between councils, health services, and the voluntary sector will be essential in bridging gaps in provision and supporting those who are at risk of being left behind. Ultimately, reducing deprivation in Devon is not just about addressing immediate needs, but about creating the conditions for long term resilience and opportunity.

This means investing in transport and digital infrastructure, supporting affordable and energy efficient housing, and empowering communities to shape the services that matter most to them. By recognising and responding to the specific challenges within communities, Devon can build a fairer, more inclusive future for all its residents.

Promoting a unified approach

Building on the existing, well performing unitary councils of Plymouth and Torbay, the four unitary solution minimises disruptive change whilst bringing the right focus to urban, rural and coastal needs. It preserves continuity in the delivery of crucial services like adult social care, children's services, and SEND, ensuring uninterrupted support for the most vulnerable in these areas.

Significant improvement journeys are underway in both Plymouth and Torbay – our communities and our partners do not want these journeys interrupted. However, LGR is a catalyst for change and improvement across the wider area.

The creation of a new urban unitary council for the Exeter area concentrates improvement capacity where growth pressures and service demand are rising fastest. A single leadership spine for early help, SEND inclusion partnerships, and school based safeguarding will accelerate a shift to prevention; while a unified transport and planning function unlocks growth sites that relieve viability constraints and support balanced communities.

Instead of residents navigating two tiers of Government, they will have one clear point of contact – a single website, one phone number, and local hubs where they can access housing, social care, and public health support in one place. This change isn't just about convenience; it's about removing duplication and freeing up resources to invest in frontline services. By sharing IT systems and procurement, and by managing waste and recycling at scale, the council can deliver better value for money

while protecting crucial services like adult social care and children's safeguarding.

At the same time, Exeter's identity will be safeguarded through Charter Trustees, and neighbourhood partnerships will give communities a real voice in shaping local priorities. In short, this transformation is about creating a council that is financially resilient, digitally modern, and keenly focused on the places it serves.

Addressing rural deprivation requires a tailored approach that recognises the unique challenges faced by these communities. Solutions must go beyond simply replicating urban models of service delivery. Instead, there is a need for flexible, locally driven interventions that harness the strengths of voluntary groups, parish councils, and community organisations. Initiatives such as place based pilots and community led partnerships have already demonstrated the value of listening to residents and co-designing support that reflects local realities.

The new Rural Devon Coast and Countryside Council will be able to focus on solutions in a rural context, utilising the local knowledge of the existing district councils. Based around existing service delivery within community offices, a renewed focus on locality will be a driver for prevention, early intervention and support.

Maintaining and improving crucial services

Central to this proposal is Torbay Council's pioneering approach to integrated health and social care which has a well established track record of speeding up hospital discharges and reducing staff shortages in the care sector. For almost twenty years,

the model has proved itself despite our ageing demographic and socioeconomic challenges. Torbay's Integrated Care Organisation (ICO) has been described as "...a pathfinder and national leader, and there is much learning that can and

should be shared from this experience."⁷ Torbay's close relationship with the community and voluntary sector, not least through the Community Helpline, is successfully diverting residents away from statutory services, with support, advice and guidance being provided within and across the community itself.

There is a very significant risk that changes to Torbay Council's boundaries would lead to the end of the integrated care organisation and that services that have been provided by the NHS for almost twenty years will need to be disaggregated from the NHS Trust and staff transferred to the council. This would have a hugely detrimental impact on the vulnerable adults who are supported through this keystone partnership.



CASE STUDY

Improving Restorative Practice in Torbay

Here at Torbay Council, our Children's Services has successfully embedded a restorative and relational practice model that has led to significant improvements in the outcomes for our children and families. This approach prioritises working with families rather than doing to them which results in fostering trust, accountability and stronger relationships throughout the system.



Restorative principles are now evident in multiple areas of our practice. This includes direct work with children, complaint resolution, safeguarding and workforce development. In child protection conferences and assessments, professionals use restorative approaches to engage families respectfully. Ofsted's 2022 inspection highlighted this as a strength, noting that "respectful work by social workers using restorative approaches supports parents to be engaged well in the process."

Co-production is central to our model. By including children and young people from the start, initiatives such as the "Point of You" feedback service and the "Our Ways of Working" framework ensures their lived experiences inform the design of the service which is for them. These tools have improved how professionals listen to and act on children's voices, influencing both safeguarding materials and strategic planning.

The "Language That Cares" campaign has supported a cultural shift across Torbay, encouraging professionals to use language that is respectful, inclusive, and trauma informed. This has helped reduce barriers to engagement and strengthen relationships between services and families.

The Learning Academy at the Council plays a key role in sustaining this change. It provides restorative, relational and trauma-informed training to staff, helping embed these principles into everyday practice. This has contributed to a stable, skilled and reflective workforce who can deliver consistent and effective support.

Torbay is proud to be the first children's services in the UK to receive Registered Organisation status from the Restorative Justice Council, recognising its commitment to restorative values and practice.

Building on this success, we are now expanding restorative and relational training across our wider services. The ambition is to become a fully relational council, embedding these principles into all areas of our service delivery.

We believe that a four unitary solution offers the strongest foundation for optimising and strengthening children's services across Devon. Our preferred option will preserve the accountability for the variation in local performance for children's services with each existing upper tier authority being rated differently by Ofsted (Torbay Council is "Good", Plymouth City Council "Requires Improvement" and Devon County Council is "Inadequate").

By disaggregating children's services into four balanced, locality focused authorities, we can deliver more tailored and agile responses to the distinct needs of urban, rural, and coastal communities. This approach mitigates the risks associated with over centralisation, ensuring that each council remains closely connected to its communities and is able to innovate in response to local challenges.

Under the current system, fragmentation has resulted in inconsistent outcomes, duplicated effort, and missed opportunities for early intervention. Transitioning to four unitaries would enable Devon to embed the new Government locality framework at the heart of its children's services - establishing clear lines of accountability and empowering each authority to codesign services with families, schools, and health partners. This structure is well placed to support the implementation of the latest children's services reforms, which prioritise integrated, place based support, data driven commissioning, and strong local leadership.

Torbay's improvement journey provides a compelling blueprint.

The council's rapid progress – from "Inadequate" to "Good" – was achieved through a sustained focus on relational practice, early help, and partnership with the community. By focussing on engaging its workforce and agreeing with them to adopt restorative practice, a recruitment and retention strategy has been developed, including a commitment to "grow our own" through the creation of the Learning Academy. Success in recruiting newly qualified social workers as well as training and developing existing staff has achieved outstanding results with a current vacancy rate of only 13%. An engaged, trained and focussed workforce has enabled real traction on improvement, culminating in improved outcomes for children and young people.

Having been rated as good for Children's Services, the focus in now absolutely on becoming outstanding and in February 2023 the Council were awarded Registered Restorative Organisation status by the Restorative Justice Council, the first local authority in the UK to receive this award.

If Torbay Council is subsumed within a larger unitary authority combining with a part of a less highly performing neighbouring council area, whatever the boundaries, there is a real risk the performance of children's services in Torbay will be pulled backwards with devastating consequences for children and young people.

Plymouth City Council is demonstrating significant improvement in children's social care services, with Ofsted confirming in January 2024 that services "require improvement to be good". The improvement journey includes strengthened practice in case summaries, supervision, visits, and plans. The council has a clear transformation plan in place to develop, sustain and embed good practice. By extending Plymouth's boundary, greater consistency in children's services will be created across what is functionally a single

community. The expanded boundary will support better early help provision by enabling a more unified approach to family hubs and preventative services, addressing one of the key improvement areas identified by Ofsted.

A four unitary model would allow best practice to be scaled and adapted across Devon, with each authority empowered to develop its own culture of excellence, invest in workforce development, and respond swiftly to emerging needs. By aligning governance with the new locality framework, Devon can ensure that every child, regardless of where they live, benefits from high quality, joined up support delivered by councils that are both resilient and responsive.

This is not simply a structural change; it is a catalyst for transformation. The four unitary solution provides the optimal platform for embedding Government reforms, driving service improvement and delivering the outcomes that Devon's children and families deserve.

All three upper tier councils in Devon are currently judged Inadequate in SEND provision, but each presents a different context.

Torbay Council has most recently received its evaluation, with inspectors highlighting entrenched problems, long delays, unmet needs, poor oversight and unresolved issues from earlier inspections.

Over recent years Torbay Council has been working with the Schools' Forum to address the pressures on the High Needs Block of the Dedicated Schools Grant. In February 2022, the Council was invited to take part in the Safety Valve intervention programme with the Department for Education (DfE). As part of the programme, we and our partners have produced, and achieved thus far, a deficit recovery plan that leads to a

balanced High Needs Block by 2026/2027. The DfE have agreed to fund the cumulative deficit of up to £12.91 million as long as milestones are met during the process. To date we have received £9.3 million from the DfE towards the deficit.

Devon County Council has been under formal intervention since 2018, was reinspected in 2022 and despite improvement plans and DfE support, implementation of improvement for SEND support remain weak and outcomes for families are still poor.

Like Torbay Council, Devon County Council has a Safety Valve deal in place, but unlike Torbay Council it has repeatedly exceeded the spending targets set by the agreement. Further, no new councils are permitted to join the Safety Valve programme and therefore national consideration will need to be given to how Devon County Council's (and other upper tier authorities') SEND deficit is managed.

Plymouth City Council had its SEND inspection in mid 2023 and is under an improvement notice, with urgent priorities around early identification, transitions, and exclusions. While collaborative planning began quickly, full impact was yet to be demonstrated.

Torbay Council's approach to reducing homelessness and improving outcomes for households demonstrates how local innovation should be at the heart of improving crucial services. Through identifying alternative, cost effective accommodation models and the provision of specialist accommodation when the market does not meet the needs of our community, we are successfully preventing the reoccurrence of homelessness. Supporting individuals and families to remain in stable, sustainable housing provision is a knock on positive economic impact.

Torbay Council - Homelessness Prevention

In our Housing Strategy 2023 –2030 we say that 'A home is special to everyone and directly contributes to good health, wellbeing, and life achievement. Having a place to call home is one of life's main goals. It offers warmth and shelter; and is the place where we feel safe and secure; a place to shape family.'

This was our aspiration when supporting a family who had faced repeat homelessness by regularly being in rent arrears and facing the ongoing risk of eviction. By working with the family and using a multi agency approach, together stabilised their housing situation.

This showcases the power of early intervention and collaborative working, particularly through a partnership between Housing Options and Children's Services.

The family had approached the housing service three times in 18 months due to cyclical arrears. Although previous interventions temporarily resolved the issue, the underlying causes remained unaddressed. This lead to recurring debt and a perception that we would always step in without requiring accountability.

To break this cycle, a comprehensive prevention plan was developed. The aim was to uncover the root causes of the arrears, resolve tenancy-related issues and support the family in taking ownership of their situation. Discussions with the landlord revealed further concerns, including poor property condition, missing fixtures and noise complaints from neighbours.

An application for Discretionary Housing Payment was submitted, but approval

hinged on the landlord withdrawing the eviction notice - conditional on resolving all tenancy issues. Housing worked closely with Children's Services, education, and youth services to shift the focus of multi agency planning towards homelessness prevention.

Neighbour mediation was facilitated, and the teenage son, whose loud music had caused complaints, was supported with headphones to reduce disturbances. The social worker helped the family clear rubbish and carry out minor repairs, including fitting door handles and fixing worktops. Communication protocols were established between the family and landlord and rent payments were safeguarded through direct benefit payments. The family also received support with benefit entitlements and affordability assessments.

The landlord was satisfied with the improvements and the family's proactive engagement. He felt reassured by our involvement and agreed to withdraw the eviction notice. A new tenancy was issued, and the family has not returned to housing services since.

The intervention led to improved living conditions, greater tenancy sustainability and more effective support from Children's Services. It also strengthened relationships between departments, particularly with education professionals who often identify early signs of family distress. Housing gained valuable insight into the complex challenges families face and how tailored, preventative support can lead to lasting change.

Transformation and integration

Torbay is reimagining adult social care with a simple but powerful goal: to help people feel truly at home, connected to their community, and supported to live the life that matters most to them. We want every resident to feel empowered – able to make informed choices about their care, and confident that the support they receive is not only high quality but also tailored to their needs.

By working closely with our local community, we enable people to find and use the resources around them – helping them navigate their community and the health and social care system – so they can stay independent and in control. And just as importantly, we support those who provide care to feel valued and equipped to enable people to take charge of their own decisions. Our transformative approach is about building a culture of mutual support - where wellbeing is something we create together. It is grounded in key principles: being agile and open to new ideas, embedding strengths based practices that focus on people's abilities and assets, delivering person centred, flexible long term care, and focusing on recovery and reablement. With joined up commissioning and integrated delivery, we're giving our practitioners the freedom to work creatively with residents, drawing on a rich mix of health, care and voluntary services across Torbay.

Torbay Council aims to enhance its status as a Restorative Council by developing and delivering a Families First Partnership Programme, which places children and their families at the centre of decision making.

Torbay has developed a well-established multidisciplinary team, bringing together professionals from statutory agencies and education to work collaboratively. Early Help works closely with the Multi-Agency Safeguarding Hub (MASH) to ensure referrals are handled proportionally. Over the past 18 months, service accessibility has increased through the introduction of an electronic referral portal linked to the Case Management System.

Early Help was transformed in 2020/21 into a multidisciplinary service that now includes Family Intervention, Reducing Parental Conflict, Housing Support, Benefits and Work Coaching, and Youth Homelessness Prevention. This collaborative approach extends to partnerships with all partner agencies and the Voluntary and Community Sector, ensuring a comprehensive teamaround-the-family model.

A recent redesign of children's services, aligned with the Families First Reforms, has merged Family Intervention, Youth Services, and Child in Need under a unified Family Help service using a locality-based model. This change, launched on 1st September 2025, aims to address local community needs more effectively. The next phase will focus on expanding agency involvement within MASH, enabling professionals and families to connect with the right expert at the right time for earlier support. Additionally, it will further develop Multi Agency Child Protection Teams and will align our Multi-Disciplinary Locality Hubs with our SEND Locality Model and the Health Neighbourhood Model to ensure full integration of services to children going forward delivered at point of need.

In terms of SEND provision, the Torbay local area partnership's Priority Impact

Plan focuses on five areas of improvement. Central to the local area's approach is local decisions being made by local stakeholders about how children and young people's needs can be best met, in a more financially sustainable, needs led, inclusive school system. The pilot currently underway aims to pool expertise and resources and to use the economies of scale (at a local level) to enable SEND support and services to be accessed more easily.

Existing shared services

Whilst Torbay Council's groundbreaking partnership with the NHS speaks for itself, there is a long history of shared and joined up services across Devon. This is at every current tier of local Government, with statutory partners and with the community, voluntary and social enterprise sector.

A range of upper tier functions are already shared or joined up across Devon - trading standards for Devon, Plymouth and Torbay is delivered by the Heart of the South West Trading Standards Service; library services are delivered by Libraries Unlimited (a Community Interest Company) on behalf of Devon County Council and Torbay Council; and across Devon, the majority of waste that isn't reduced, reused, recycled or composted is sent to one of two energy recovery facilities either in Exeter or Plymouth.

With Devon County Council and Torbay Council having developed a Joint Local Transport Plan in the past, the Devon and Torbay Combined County Authority (DTCCA) is now the Local Transport Authority. The Plymouth and South West Devon Joint Local Plan was adopted by Plymouth City Council, South Hams District Council and West Devon Borough Council in March 2019.

Devon Building Control Partnership provides Building Control Services across three existing district councils covering over 1,000 square miles. South Hams District Council and West Devon Borough Council has a shared management team and workforce. A stand alone company owned and controlled by the three councils, Strata is a partnership which shares IT services between East Devon, Exeter and Teignbridge Councils.

Further collaboration and joint commissioning

Using the learning from each of these examples, we are committed to ensuring that all options for further collaboration and joint commissioning are fully exploited.

The removal of duplication and fragmentation within the existing two tier areas of Devon is vital for improving services for all of our residents. With shared service design principles of co-production, accessibility, and integration, the four

unitary solution will improve public services by making them more user focused, efficient and responsive to community needs.

Delivering LGR in Devon is a rare and transformative opportunity – one that allows us to build a modern, resilient, and truly community driven system of local Government. And one that collaborates as standard.

Our plan for the next steps of our County is shaped by Devon's distinctive character: its vast geography, diverse communities, and deep seated sense of place. We're also drawing on the practical lessons learned from other regions that have successfully navigated similar changes.

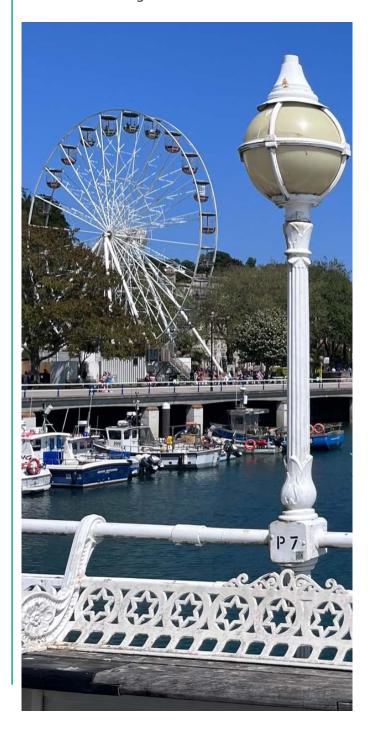
At the heart of our approach is a simple promise: to improve the lives of Devon's residents. We want every service we provide to be responsive to local needs, ambitions, and identities. The move to four unitary councils is designed to make local Government more accessible, more accountable, and better equipped to deliver what matters most to our communities.

We know that Devon's challenges don't respect council boundaries. Whether it's tackling health inequalities, driving economic growth, or protecting our environment, the issues we face are shared across cities, towns, villages and rural areas alike. That's why our vision for LGR is built on collaboration. We're committed to working together with neighbouring councils, the NHS, voluntary groups, businesses and other partners – because the best solutions are those we design and deliver together. Devon's reorganisation should be a springboard for change and a new way of collaborative working.

So, looking ahead we'll continue to seek out opportunities for joint working and shared innovation across the whole County. By pooling our strengths and expertise, we can address complex challenges in ways that no single authority could achieve alone. Our four unitary solution is not just about redrawing lines on a map; it's about creating a flexible, future ready system that can adapt to new demands and seize new opportunities as they arise.

We want to break down the barriers to our communities accessing high quality public services, homes, efficiencies, sustainability and value for money.

Above all, our commitment is to build local Government that is sustainable, resilient, and fit for the future – a system that puts people and places first, and that stands the test of time for generations to come.



Torbay Council - Safeguarding the future of local Libraries

In 2017, we launched a tender process to secure a new provider for Torbay's library services. Its aim was to protect the quality of provision for local residents while reducing operational costs. With a strong commitment to keeping Torbay's libraries open, vibrant, and accessible, we appointed Libraries Unlimited a local charity with a passion for community learning.

Originally part of Devon County Council, Libraries Unlimited was formed in 2016 with a mission to deliver innovative, inclusive library services. By partnering with Libraries Unlimited, we achieved significant financial savings while safeguarding the future of our four libraries in Brixham, Churston, Paignton, and Torquay.

Library staff were retained ensuring continuity of service and local expertise. Libraries Unlimited took on responsibility for IT infrastructure and streamlined operations by integrating backoffice systems, websites, and library management platforms. All four libraries remain open and annual customer feedback tells us residents value their professional, high quality services.

Partnering with Libraries Unlimited has boosted efficiency and improved user experience for Torbay residents. The service has continued to grow introducing eBooks, audiobooks, digital magazines, newspapers and making it easier for people across Torbay to access resources from home or on the go.

One of the standout benefits of our partnership with Libraries Unlimited is access to Devon's wider library stock.

This gives our residents a richer and more diverse catalogue of books and materials. Libraries Unlimited has also brought cultural vibrancy to the libraries through external funding, including support from Arts Council England. Theatre performances, film screenings, and creative workshops have transformed library spaces into hubs of community engagement, attracting new audiences and fostering local pride.



As a charity, Libraries Unlimited can use funding streams not available to us, regularly securing grants that enhance local services. This flexibility has made Torbay's library provision more resilient and responsive to the evolving needs of our community, whether digital, economic or cultural.

The commissioning of Libraries Unlimited has delivered more than just cost savings. It has strengthened Torbay's library network, expanded services and deepened community connections. We have ensured our libraries remain places of learning, creativity and wellbeing across the Bay.



Criteria 4: Working together to understand and meet local needs

From the outset, Torbay Council has been a collaborative, willing partner seeking to bring together councils across the area to work in the best interests of all of Devon's communities.

With the voice of residents at the heart of developing this proposal, we have testedour emerging thoughts, our interim plan and our final proposal with our residents, our businesses and our stakeholders. A joined up approach to engagement means that our proposal is anchored in its place – designed around real places and real communities – so that all four unitary councils can deliver with purpose.

We know that Devon is beautiful, but we also know that that is not the full story. The challenges facing our residents are complex. They have told us what they value. They have also told us that they expect us to deliver. This proposal meets their needs – in their localities.

This section addresses the Government's fourth criteria for local Government reorganisation (LGR), in that we need to show how we have worked together to form a proposal which meets local needs and is informed by local views.

Criteria 4a:

Meaningful and constructive local engagement.

Criteria 4b:

Considering issues of local identity and cultural and historic importance.

Criteria 4c:

Addressing local concerns

Working together

Since the initial publication of the English Devolution White Paper in December 2024, through to the preparation of our interim plan and continuing until the submission of our final proposal for LGR in Devon, the Leader of Torbay Council has been working with the Leaders of all the other councils in Devon to understand their positions.

The sheer geographical size of Devon and the diverse needs of its population have meant that an "obvious" solution has not been forthcoming. The existence of two long standing unitary authorities (serving one of the County's cities and a separate large urban conurbation), a second city, no fewer than 26 market and coastal towns and the dispersal of the rest of the population across a very large rural area highlights the need for issues of local identity and cultural and historic importance to be appropriately recognised.

The Leader of Torbay Council has placed engagement at the heart of developing our interim plan, options appraisal and final proposal. From our first public engagement event in March 2025 through to an engagement survey based on shared questions across the geography and into a series of engagement events with stakeholder groups and partners, the views of the whole Devon community, and not least the views of Torbay's communities, are central to our proposals.

In determining how best local Government can be reorganised in the rest of Devon, we have worked collaboratively with colleagues at Plymouth City Council, Devon County Council and each of the district councils, including Exeter City Council. We have sought the views of NHS Devon (our local Integrated Care Board), the Devon, Cornwall and Isles of Scilly Police and Crime Commissioner, the Devon and Somerset Fire and Rescue Authority, our local Further Education and Higher Education providers, Dartmoor National Park Authority and Exmoor National Park Authority and from our voluntary and community sector.

Highlights from local engagement

In partnership across Devon, we have sought to engage widely with our residents, businesses and partners as we have developed our proposal.

We developed a shared engagement survey with the district and borough councils (excluding Exeter City Council). This was based on the survey used by Plymouth City Council and Exeter City Council's later engagement survey was based on the common questionnaire of the district and borough councils. The surveys included several questions related to LGR, place, key services and governance.

Table 10 shows the responses received to each survey:

Local Authority	Responses
Torbay Council	1430
District and Borough Councils	4518
(excluding Exeter City Council)	
Plymouth City Council	824
Exeter City Council	2056

Table 10. Engagement survey responses by council.

Across all of Devon, engagement surveys were supplemented by roadshow events, facilitated conversations and discussions at regular forums such as the Torbay Place Leadership Board, all supported by wide reaching information and awareness raising through websites, social media and newsletters.

With ten out of the eleven councils across Devon sharing the broad basis of an engagement questionnaire, we have based our proposal on what our communities have told us matters most about their places and local Government.

Key themes from the engagement across Devon include:

- Residents expressed a strong emotional and cultural connection to their local areas, emphasising the importance of preserving distinct community identities.
- There was widespread concern that larger, centralised councils would be disconnected from local needs and diminish local representation.
- Respondents overwhelmingly supported governance models that enable decisions to be made locally, with councillors and services accessible within their communities.
- There was a strong desire to maintain the rural and coastal character of towns and villages, with many expressing fears that being absorbed into larger authorities would lead to a loss of identity and neglect of local priorities.

In many cases, these themes were mirrored by the views of stakeholders. Stakeholders also highlighted:

Reorganisation across Devon would provide new opportunities for collaboration, with potential benefits of aligning with NHS and education boundaries, improving services for those with Special Educational Needs and/or

8 Our engagement survey ran from 1 July to 2 September 2025 and received 1430 responses. The full engagement report is available at Appendix 1

- Disabilities and unlocking wider funding.
- Housing and inequality are critical issues, with poor housing linked to health and economic outcomes, and stark inequality in coastal and rural areas.
- Specifically in Torbay, there was a strong desire that the current momentum in its regeneration programme is not lost.

From Torbay Council's engagement survey, there is support for Torbay Council remaining as a continuing unitary authority with 64% of respondents to our engagement survey⁸ in favour of this option.

People have confidence in Torbay Council. Among those who feel Torbay should remain as a continuing unitary council on its current boundaries, the Council is seen as:

- Functioning well
- Financially stable
- Responsive
- Delivering regeneration to the area

People also expressed concerns about the disruption, costs and loss of control that could be brought about by changing the Council now.

People felt that Torbay Council was already delivering well against the Government's LGR criteria.

Over 60% of respondents agreed that the Council would continue to meet outcomes around supporting local identity and enabling strong community engagement. And over 55% of respondents felt the Council would continue to deliver well on economic and housing growth and high quality and sustainable public services.

Torbay's Brighter Bay

As part of our commitment to enhance the quality of the local environment for our residents and visitors, our wholly owned company SWISCo developed a plan to deliver visible and measurable improvements across our three towns.

Using savings achieved through operational efficiencies, and feedback from councillors, SWISCo identified key areas and launched the Brighter Bay programme in 2024.

Brighter Bay focusses on:

- boosting floral planting
- improving weed control
- increasing the frequency and quality of highway and verge cutting
- expanding street cleansing in Brixham,
- improving response times for highway defect repairs
- adopting a 'right first time' approach to maintenance.

Brighter Bay 2025 is building on these goals, aiming for further improvements to our streets, verge cutting and weed control.

To deliver these improvements, SWISCo invested in specialist equipment. This included pedestrian sweepers, mechanical weed rippers, highway planning machinery, and weed control vehicles.

Additional staff have been recruited, and a new grass cutting strategy has been introduced. This prioritises 'premier' and main routes to ensure high standards along major commuter and gateway



roads. A performance tracker was developed to monitor progress and ensure accountability.

The impact of Brighter Bay has been significant. Grass cutting frequency increased from three to four times annually to every two weeks on premier routes. Brixham now benefits from a dedicated orderly equipped with narrow access street sweeping machinery. Weed spraying, sweeping, and verge maintenance has also been integrated and has improved operational efficiencies.

Highway repair response times have also improved, supported by a revised inspection manual. Floral displays have expanded year on year, with seasonal planting and hanging baskets reintroduced, bringing vibrant colour to our public spaces.

The initiative has led to a rewarding rise in compliments, marked reduction in complaints and a faster response to service requests. We've increased the amount of digital reporting from our residents, installed over 40 Big Belly solar compacting bins, enhanced lighting, and improved graffiti removal. Staff morale has improved, with teams feeling empowered by access to the right tools and resources to deliver quality work.

Addressing local concerns and priorities

Our proposal addresses the key themes from our engagement surveys, namely:

Residents and stakeholders expressed a strong emotional and cultural connection to their local areas, emphasising the importance of preserving distinct community identities.

Stakeholders identified the need to preserve the distinct identities of areas and ensure that decisions remain locally accountable.

In particular, respondents to the Torbay survey felt strongly connected to "The Bay" and its three coastal towns. There is a lot of pride in Torbay and people identify with it as a distinct sub region.

Plymouth residents shared a vision for a greener, safer and more inclusive city. Respondents to the Exeter engagement valued the character and community feel of their local area, particularly its peaceful environment, friendly people, proximity to green and coastal spaces and accessibility to other locations.

Across Devon's rural communities, there was a similar message with a sense of place which is embedded in locality. Residents have a profound attachment to their local areas with these places not necessarily defined by geography but by community, heritage and a way of life.

We are proposing a four unitary solution for Devon in which Torbay would be a continuing council on its current boundaries. This recognises and supports what people have told us about their place.

Our proposal designs councils around functional places, using travel to work and housing market areas, so that planning, housing and growth are aligned with how communities actually live and identify.

It builds on existing community partnership and Voluntary, Community and Social Enterprise (VCSE) strengths so that local voice and heritage are embedded in service design and governance, rather than diluted by reorganisation.

There was widespread concern that larger, centralised councils would be disconnected from local needs and diminish local representation.

People believe that local democracy is best served close to the people. They would like to see more transparency, accountability and engagement from local Government and more resident involvement in decision making.

Similarly many stakeholders, especially smaller VCSE organisations and local business representative organisations, felt that the councils needed to be of manageable scale to benefit from effective partnerships.

Within those areas proposed to form part of the expanded Plymouth City Council and the new Exeter Council, there is a strong desire to retain local decision making through empowered parish and town councils, as well as broader community forums.

Within the existing district and borough councils, many respondents fear that reorganisation could lead to a dilution of local representation and decision making. A recurring theme is the desire for decisions to be made by those who understand the unique needs of rural communities.

With Torbay Council remaining as an existing unitary council, decision making

will remain close to the community.
Our Community Engagement and
Empowerment Strategy outlines the steps
we are already taking towards deciding
and acting together as well as supporting
independent community initiatives.

This approach will be echoed in the other unitary councils within our proposal as all councils progressively move from informing and consulting towards collaborating and empowering. As we continue on that journey, we will work with our communities to build confidence and capacity.

Our approach recognises that empowerment looks different in different places, not least in the unitary model of Government across England. It also recognises the existing network of parish and town councils across Devon which are already delivering for and with their communities.

Whilst awaiting detailed regulation referenced in the English Devolution and Empowerment Bill, we will work flexibly to support locally appropriate governance solutions whilst maintaining consistent standards and values over each area.

Respondents overwhelmingly supported governance models that enable decision to be made locally, with councillors and services accessible within their communities.

People told us that the most important aspect of local Government for them and their communities was that local decision makers had to have a good understanding of the issues facing the local area.

People in the rural areas of Devon wanted to be reassured that their communities would be properly represented in the expanded city councils. There were worries that the creation of larger authorities could dilute local focus, increase bureaucracy, and reduce access to councillors.

Concerns were raised about the financial costs of reorganisation, the potential disruption to services, and loss of democratic engagement.

Respondents valued how local councils serve the community with people wanting services to be delivered efficiently and reliably. People also valued organisations which were inclusive and accessible to all residents.

The four unitary councils within our proposal are sized to balance efficiency with visibility and accountability to place. We are committed to locally based service models which keeps decision making closer to residents and avoids one size fits all delivery. This configuration explicitly enables local decisions, with services being tailored to community needs.

Our proposal will use the existing democratic and partnership structures, such as Torbay's Community Partnerships and the strong parish networks across Devon, as foundations for neighbourhood level engagement under the new arrangements. These will be used to co-produce solutions and maintain accessible front doors to services, particularly in rural areas transitioning into the new Rural Devon Coast and Countryside Council.

With two councils being classed as "continuing" this will minimise disruption and preserve residents' access to familiar service portals, including access to councillors.

The indicative councillor numbers which are proposed reflect the unique demands, as well as the practical considerations, of serving extensive rural areas; with the ratios of councillors to electorate in three urban councils being tailored to those compact urban geographies.

There was a strong desire to maintain the rural and coastal character of towns and villages, with many expressing fears that being absorbed into larger authorities would lead to a loss of identity and neglect of local priorities.

People care about their places.

In Torbay, they want Town Centre regeneration, a strong year round local economy, cared for parks and streetscapes, public spaces that feel safe and accessible, good roads and transport and to protect the environment.

Respondents to the Plymouth engagement highlighted the need for safeguards against overdevelopment and urban sprawl. They wanted strategic planning which respects local character, protects green spaces and ensures infrastructure keeps pace with growth to meet the needs of the expanded authority.

Across the whole of Devon, people want better services and particularly want improvements around housing and homelessness, healthcare and services for children and young people.

Residents also had concerns about how services would maintained or improved across all areas, with particular attention to rural needs, transport connectivity, healthcare access and waste management.

Our proposal retains Torbay Council so that its coastal identity, as well at its regeneration focus, can be safeguarded rather than being subsumed into a larger area. It aligns planning and housing with real geographies, preventing piecemeal sprawl which protects the character of surrounding towns and villages. As new local plans are developed, there remains a commitment to an extensive programme of community and stakeholder engagement.

And the creation of a rurally focused Devon council means that countryside, moorland and coastal priorities, such as connectivity, hidden poverty and service reach, are not overshadowed by urban agendas.

Reorganisation across Devon would provide new opportunities for collaboration, with potential benefits of aligning with NHS and education boundaries, improving services for those with Special Educational Needs and/or Disabilities (SEND), and unlocking wider funding.

Better alignment could reduce duplication and improve coordination of care and learning pathways. This would be particularly beneficial for families navigating complex systems for SEND.

Reorganisation could create a more integrated approach, reducing fragmentation and improving outcomes for those residents who currently navigate multiple and complex systems.

A unified structure could strengthen Devon's ability to attract and manage external funding streams, including national grants and regional investment programs. By presenting a cohesive strategy across health, education and social care, collaborative investment could unlock opportunities for integrated service delivery

Integrated Care in Torbay - 'From hospital discharge to community reconnection'

This case study shares the story of TM and his recovery, which was supported by range of services, teams and organisations across Torbay. The right outcome was achieved by putting TM and his needs at the heart of all of the decisions made.

The teams involved in the support for TM include the:

- Salus Ward, provided by Devon Partnership Trust. The ward provides 16 beds and is based at Torbay Hospital. The ward provides assessment, care, treatment and therapeutic support for adults who are experiencing a crisis with their mental health.
- Torbay Approved Mental Health Professionals (AMHP) who are approved by Torbay Council to carry out certain duties under the Mental Health Act. They consider and coordinate Mental Health Act Assessments
- Older People Mental Health Team, provided by Torbay and South Devon NHS Foundation Trust

TM was admitted to a Ward at Torbay Hospital in April 2025 following a deterioration in his mental health. Despite previous involvement with the Home Treatment Team, his condition worsened. He became reluctant to take prescribed medication, was eating less,



and lost 10kg over a few months. With a history of psychotic depression and a prior inpatient stay in 2011, TM was assessed as experiencing a relapse, presenting with both depressive and psychotic symptoms.

After several weeks on the ward, TM had stabilised clinically but had become de-skilled and withdrawn. Although his acute symptoms had resolved, concerns remained about his ability to manage independently at home. He lacked confidence and had lost basic life skills, such as preparing meals. The goal was to support TM's safe discharge, reintroduce him to community living, and prevent future relapse - restoring autonomy without overwhelming him.

TM expressed a strong desire to return home, a view echoed by his family. In response, a tailored care package was developed to balance support with independence. Medication was consolidated to require only one daily visit from carers for prompting. An enabling

service was arranged for evening visits to assist with meal preparation, rebuilding TM's confidence in daily routines.

Family involvement was key. Recognising the positive impact of their presence, we encouraged them to take an active role. They committed to regular shopping trips and weekly outings, helping TM reconnect with familiar environments and routines.

TM's transition back into the community has been a success. He has remained well for several months, with no signs of relapse. He now independently shops, visits local coffee shops and engages with his surroundings. His family continues to play a vital role, providing informal support and remaining vigilant to any changes in his wellbeing.

This case exemplifies the power of collaborative working between services and families to reverse institutionalisation and promote recovery. It highlights how a personalised, strengths based approach can rebuild life skills and foster long term stability. TM's journey is a testament to what can be achieved when clinical recovery is matched with practical, compassionate support in the community.



and innovation, ultimately improving outcomes for vulnerable groups.

Our proposal keeps the integrated care organisation within Torbay and, with appropriate Government backing, this arrangement could be both strengthened and used as a model for adult social care delivery elsewhere. The approach promotes place based health and care integration and leads to better outcomes for our residents.

It sets up clearer footprints for partnership working in locality based models which enable targeted improvement where residents in each council face different pressures.

Fundamentally, the proposal paves the way for a South West Peninsula Mayoral Strategic Authority (MSA) which builds on the existing Devon and Torbay Combined County Authority (DTCCA) to unlock deeper devolution and funding streams across transport, skills, housing and growth.

Housing and inequality are critical issues, with poor housing linked to health and economic outcomes and stark inequality in coastal and rural areas.

Housing quality remains a fundamental determinant of health and economic stability. Poor housing conditions are linked to higher rates of respiratory illness, mental health challenges and reduced educational attainment, creating a cycle of disadvantage. Stakeholders stressed that reorganisation must prioritise housing strategies that address these systemic issues.

There was also strong concern about the widening gap between coastal and rural communities compared to urban centres. Stakeholders called for targeted interventions, such as affordable housing schemes and improved transport connectivity, to reduce isolation and ensure equitable access to employment and services. Tackling inequality, with councils providing holistic support, is seen as essential for achieving inclusive growth across Devon.

Our proposal is based around four functional housing geographies so that our local plans can match need and land supply – with a focus on regeneration and affordable need in Torbay; large site delivery around Exeter and eastern Plymouth; and rural affordability and access in Devon.

Targeted early help and prevention models, based in localities, will continue to address issues of health, housing and inequality where deprivation is most acute. The creation of unitary councils in current two tier areas will kickstart innovative practice with the existing unitary councils being able to provide examples of best practice as well as sharing knowledge and expertise.

The proposal combines local responsiveness with strategic coordination with the existing DCTTA and the prospective MSA co-ordinating spatial strategy, aligning infrastructure, and delivering skills and growth investment where inequalities are most stark.

Specifically in Torbay, there was a strong desire that the current momentum in its regeneration programme is not lost.

The Local Government Association rightly highlighted in its report following Torbay Council's Corporate Peer Challenge that this is Torbay's "moment in time". Our Corporate and Community Plan sets out an ambition of a 'healthy, happy and prosperous Torbay' and the 'Torbay Story' outlines a long term vision and the characteristics and opportunities of the Bay.

The 'Torbay Story' enjoys the full support of partners across the public, private and voluntary sectors and the level of Government funding to support key regeneration projects is unprecedented. This is what constitutes the 'moment in time' for Torbay and the attendant level of expectation, both politically and amongst partners, is significant.

We have taken the feedback from the LGA and mobilised our capacity to deliver at pace. Our communities are seeing the benefits of our regeneration programme and do not want to lose the momentum.

Our proposal sees Torbay Council as a continuing unitary on existing boundaries, preserving leadership, accountability and delivery capacity for ongoing town centre renewal, housing, and economic programmes.

It protects our integrated service models that underpin regeneration outcomes – notably the integrated care organisation and the Community Helpline – so health, care and housing levers keep working together during and after reorganisation.

Retaining our brand and investment narrative enables focused placemaking aligned to economic growth in hi-tech and creative industries – all towards a healthy, happy and prosperous Torbay.

Maintaining local identity

Our proposal means that Plymouth and Torbay retain their distinct urban profiles – Britain's Ocean City and the English Riviera – while Exeter, as the region's capital with its proud Lord Mayor designation and oldest serving municipal building still in use for its local Government home, is elevated through boundary expansion to reflect its growing strategic role. This configuration allows each urban centre to pursue tailored strategies that reflect local culture, economic strengths and service needs.

The creation of the new rural authority complements this by enabling focused governance across Devon's dispersed communities, market towns, and coastal villages, ensuring that rural priorities are not overshadowed by urban agendas.

Preserving urban identities and establishing a dedicated rural, coast and countryside authority ensures that governance is responsive to the unique characteristics of both urban and rural areas. It avoids the dilution of civic identity and strategic focus because each unitary council can maintain direct accountability to its residents, promote its economic and cultural assets, and deliver services that are locally relevant.

The proposition represents a Devon solution for the unique makeup of the County. The model strengthens place-based leadership, supports inclusive growth, and ensures that no community - urban, coastal or rural - is left behind in the reorganisation.



Criteria 5: Supporting devolution arrangements

Using the existing Devon and Torbay Combined County Authority (DTCCA) as a strong first step, our proposal provides sensible population ratio sizes between constituent authorities as we move to a South West Peninsula Mayoral Strategic Authority (MSA).

We see the future MSA as the key to unlock the power of combining localism with regional scale for both the four unitary solution, and the wider peninsula. This section addresses the Government's fifth criteria for unitary local Government – new unitary structures must support devolution arrangements.

Criteria 5a:

The Devon and Torbay Combined County Authority and its governance arrangements.

Criteria 5b:

Unlocking deeper and further devolution.

Criteria 5c:

Sensible population ratios between local councils and a Mayoral Strategic Authority.

Devon and Torbay Combined County Authority

It is the Government's strong preference to create Strategic Authorities that bring together more than one council over a large geography. Government's ambition is for all parts of England to have a Mayoral (and eventually an Established Mayoral) Strategic Authority.

The Leaders of all councils in Devon are committed to deeper and further devolution through the establishment of MSA which would bring further decision making closer to the people of Devon and unlock unprecedented opportunities for growth and innovation. It would enhance local control and improve outcomes for our residents and businesses. Our region represents a unique geography with a multitude of distinctive place based identities, yet we share common economic interests, established connections, and overlapping public service boundaries.

The existing DTCCA, formed in 2025, is a strong first step. Leaders across Devon have continued to work collaboratively on a range of strategic programmes and now believe the time is right to explore a more comprehensive devolution agreement that brings our communities together under an MSA.

Our approach to establishing a South West Peninsula MSA is inclusive and forward looking. Whilst Cornwall Council has indicated that it would not wish to be part of a South West Peninsula programme at this time, we believe that an MSA would be stronger with their involvement, and therefore we will be leaving the door open for them to join in the future.

The case for a South West Peninsula Mayoral Strategic Authority

Representing a population of 1.2 million people, a South West Peninsula Mayoral Strategic Authority, covering the proposed four unitary councils of Devon, reflects a spatial geography which is recognised, understood and comprises markets effectively functioning across housing, labour and consumer areas. A South West Peninsula MSA presents a coherent case established through geography, economic coherence and strategic opportunity. Such an MSA would also be larger than the other devolved areas in the South West, with Cornwall Council representing 570,000 people and the West of England Combined Authority representing 950,000 people.

The proposed MSA area is a significant contributor to the nation's economic growth and is comparable to the economy of several existing Combined Authorities. It is a diverse economy worth over £33 billion annually with world class research institutions and innovative business clusters offering the potential for scalable economic growth.

Located at the heart of the South West Peninsula, and capturing several functional economic areas, the area contains around 21% of the South West's population and 16% of its output, making it larger than the city of Bristol itself. At this scale it is directly comparable to existing Combined Authorities such as Tees Valley or Cambridge and Peterborough.

The proposed MSA area comprises several travel to work areas reflecting the

geographic size of the County. These travel to work areas are nuanced with commuting flows across the area reflecting the link between skills, housing markets and the opportunities created by our combined strengths in:

- advanced manufacturing,
- clean energy and environmental industries,
- defence and, in particular, marine autonomy, and
- digital and technologies.

These sectors are complemented by other bedrock sectors, including tourism, and create an economic powerhouse that supports delivery of the Modern Industrial Strategy and where the proposed MSA could accelerate the Government's growth mission.

Although Devon as a whole has outpaced national job growth by around 1% per annum over the past five years, the overall annual gap with UK GVA per head had widened to 29% by 2021. Promoting the potential of the area, based on its sectoral and innovation clusters, its research institutions and the potential for deeper coordination of housing, transport, skills, innovation and growth, will help address disparities such as those found in Torbay which is amongst the worst performing areas in the country. Whilst centres like Exeter and North Devon have seen stronger performance, the area is typified by a significant intra district and area difference in economic performance across both its rural and urban areas.

A coordinated approach on the South West Peninsula would enable us to:

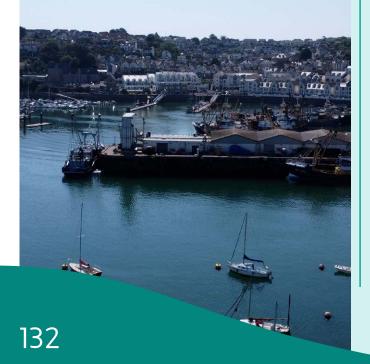
- Maximise the potential of our exceptional environmental assets and internationally significant research capacity to position the UK as a leader in environmental intelligence and clean marine innovation.
- Support the vital national security role of Devonport dockyard, which maintains the UK's Continuous at Sea Nuclear Deterrent capability and will see £4.4 billion of investment over the next decade as part of the Ministry of Defence's long term commitment.
- Leverage our significant tourism economy (worth over £2 billion annually) more effectively through coordinated investment and promotion. The visitor economy across Devon supports nearly 33,000 local jobs.
- Address the specific housing pressures faced by our communities with a strategic approach to housing affordability and availability.
- Create an integrated transport network that connects rural and coastal communities with our urban centres and beyond.
- Develop coordinated skills provision that meets the needs of our key growth sectors and addresses productivity challenges.

Fish and Hi Tech Chips

In seeking to drive up productivity, earnings, and economic performance, two strategically important sectors – electronics & photonics and fishing – offer long term sustainable jobs in a coastal community dominated by seasonal employment.

Tackling the economic challenges around productivity, earnings, skills and health is just part of our ambition for the people who live and work here to be better connected, more competitive and more prosperous.

With potential in both our traditional and growth sectors, fish and hi tech chips in Torbay demonstrates how deeper devolution can help to level up the area. Both sectors have high export potential and through using internationallycompetitive assets can bring about positive change and increase productivity.





Brixham Fish Quay

Brixham is a long established port and is at the heart of the town's heritage, culture, and economy. The largest value of catch in England and Wales is landed at Brixham. Along with quays to land catches, there is a thriving fish market.

There are significant opportunities in fishing – to increase capacity, double the size of the fish market, and create more sustainable jobs. The fishing sector has seen growth in the value of catch of 79% between 2011 and 2021 with employment growing by 19% in the last five years.

Brixham Harbour has reached its capacity to deal with fish landing and processing. Investing in the port infrastructure enables the sector to capitalise on growth opportunities and create more sustainable employment. This will enhance Brixham's position and reputation as a port, preserving and promoting the area's culture. The fishing industry in Brixham will be more economically sustainable with greater critical mass of activity ensuring that all the trades and skills essential in supporting and supplying the industry remain in place.

Electronics and Photonics Innovation Centre and Production Park

EPIC, Torbay's Electronics and Photonics Innovation Centre, opened in 2019 to support the needs of Torbay's thriving microelectronics and photonics cluster. The £8 million centre is home to 13 businesses, each of which is an innovator in its field.

The facility has attracted three foreign owned companies that have chosen to grow their UK operations in Torbay. In addition to modern surroundings and facilities, EPIC offers its businesses access to over £3 million worth of equipment, enabling them to penetrate new markets. The facilities are used to serve clients in the aerospace and MedTech sectors.

Innovative businesses are growing fast, and a strong identity is forming through both EPIC and the Torbay Hi-Tech Cluster – all helping to drive manufacturing and production and creating more high value jobs.

Building on internationally recognised local expertise, investment will deliver new production and manufacturing facilities at Torbay Business Park. It will provide specialist production facilities enabling hi tech businesses to move from research and development into manufacturing and production. Supporting deepening innovation and enabling the growth of the sector and the attraction of inward investment.



The new electronics and photonics production park will bring 144 high value jobs and £6.8 million of Gross Value Added (GVA) per annum to Torbay.

Whilst there are recruitment challenges across all sectors, South Devon College has co-designed with local businesses a new photonics degree. As the sector continues to grow, more degree level students will enter the local labour market raising the skills levels.

The benefits from increased collaboration will drive innovation and world class expertise – reinforcing the area's international reputation as a globally competitive location for electronics and photonics, ensuring retention and growth of existing businesses, and future investment both domestic and overseas.

Collaboration

There is an established, long standing spirit of collaboration that exists in Devon, with the councils across the area having worked effectively together on various partnerships and initiatives including the Heart of the South West Local Enterprise Partnership (with Somerset Council), the Plymouth City Deal and the Plymouth and South Devon Freeport.

More widely, partners are committed and effective contributors to Peninsula Transport, the sub regional transport board. Prior to the establishment of the DTCCA, Devon and Torbay had a shared Local Transport Plan reflecting the close working relationships now embedded within the DTCCA.

The same partners are working closely, again through the DTCCA, on the Local Growth Plan and, recognising the layering of the labour markets and connected nature of the travel to work areas, are working with Plymouth City Council to "Get Devon, Plymouth and Torbay working".

The proposed MSA brings together these functions at a geographic level which provides scale and which will deepen our capability to integrate housing, transport, skills and other investment plans in support of the significant economic opportunities that exist in the South West Peninsula.

Governance

Regardless of the final configuration of local Government in Devon, the proposed MSA would be contiguous with its constituent authorities. This approach prevents Plymouth City Council from becoming a "devolution island" within the South West which it currently is between Cornwall Council and the DTCCA.

This proposal ensures sensible population size ratios between the constituent local authorities and the MSA, ensuring equal partners in size as well as name.

The existing DTCCA would be retired upon commencement of an MSA. Should vesting day for local Government reorganisation occur before the MSA is established, the DTCCA would likely transfer to a Combined Authority (pending legislation) with the Torbay Council and the new unitary authorities for Devon and Exeter becoming its constituent authorities.

Pending the reorganisation of Integrated Care Partnerships, the Mayor would have a seat on the Integrated Care Partnership for Devon and would be considered for the role of Chair or Co-Chair.

Fire and Rescue Services would remain on the existing Devon and Somerset footprint. Should Cornwall wish to join the South West Peninsula MSA at a future date, the Mayor would take over the role of Police and Crime Commissioner.

A Mayor promoting the interests of our area would be a powerful advocate for the whole of Devon, sitting on the Council of Nations and Regions, chaired by the Prime Minister, and the Mayoral Council, chaired by the Deputy Prime Minister.

We see the future MSA as the key to unlock the power of combining localism with regional scale for both the four unitary solution and the wider peninsula.

Criteria 6: Stronger community engagement and neighbourhood empowerment

Community empowerment is at the core of our proposal. It will deepen local engagement by aligning governance with community identity and lived experience. It builds on existing innovative and inclusive approaches to community engagement in Exeter, Plymouth and Torbay. And sets a framework for the development of new approaches to neighbourhood empowerment across Devon with the existing network of parish and town councils as a strong and established foundation.

The four unitary solution, based on the lives of the communities they serve, avoids the democratic disconnect of larger, remote councils because each unitary is sized to maintain meaningful engagement with residents, enabling decisions to be made by councils that understand local priorities and contexts and how people live their lives.

With each authority having tailored councillor representation to ensure fair and accessible governance, we will reduce administrative complexity and enhance responsiveness to local needs – urban, coastal, and rural alike.

This section addresses the Government's final criteria for local Government reogranisation (LGR). New unitary structures should enable stronger community engagement and deliver genuine opportunities for neighbourhood empowerment.

Criteria 6a and 6b:

Enabling strong community engagement.

Embedding collaborative partnership

Devon stands at a crossroad. Its future depends on a governance model that puts people and place at the heart of decision making. There is an opportunity under the four unitary solution to embrace a system where community voices are not just acknowledged but actively shape policy and investment priorities. By prioritising the interests of residents and recognising the unique character of each neighbourhood, the new configuration of local Government for Devon ensures that decision making is based on local knowledge and lived experience.

In an era of lowering trust in those in positions of power, this approach means embedding genuine engagement mechanisms, allowing communities to have a meaningful say in matters that affect their daily lives. It also requires that governance structures are flexible and responsive, capable of reflecting the diversity and aspirations of Devon's cities, towns, villages, and rural areas. Ultimately, sustainable progress hinges on a collaborative partnership between councils and the communities they serve, building a foundation of trust, transparency, and shared responsibility.

Our proposal to establish four unitary councils represents more than a mere alteration in governance structure; it stands as a pledge to place communities at the forefront of local transformation. This approach is underpinned by a robust body of evidence demonstrating that the current councils already deliver meaningful engagement and effective services to residents. By building upon these successes, the new model aims to deepen community involvement, ensuring that

future decision making remains anchored to local knowledge and experience. The four unitary framework seeks to empower neighbourhoods, giving residents genuine influence and fostering inclusive, community driven growth.

This model is designed to unlock the potential of neighbourhoods, giving residents genuine influence over the services and investments that shape their daily lives. By reducing administrative complexity and aligning governance with local identity, each unitary council will be better equipped to respond to the distinct needs of its communities – whether rural, coastal, or urban.

Through devolved powers, participatory budgeting, and embedded community leadership, the four unitary solution will enable:

- Neighbourhood level decision making that reflects lived experience.
- Stronger partnerships with town and parish councils, voluntary groups, and our place partnerships.
- Fair and accessible representation, with councillor numbers tailored to community scale and geography.

We believe a four unitary solution can reinvigorate civic engagement, foster inclusive growth, and create a governance culture based on trust, transparency and collaboration. The four unitary model bakes in mechanisms by which communities will be empowered – not as passive recipients of services, but as active co-creators of their future.

Torbay Community Helpline

As in many places across the country, the wider community response to Covid-19 in Torbay was fantastic. It saw a multitude of volunteers from a range of community, faith, voluntary sector and small organisations come together, to support its community during a hard and isolating time.

It was during this time that Torbay Council supported the sector and was brave about trying new and emerging ideas. One of these was the Torbay Community Helpline.

Offering a single point of access, the focus was on community and neighbourhood solutions, including identifying if the person asking for help could offer help in return.

It soon became apparent that most of the work of the Helpline was promoting wellbeing, addressing issues quickly using community resources and actively preventing some people from needing adult social care.

As a result, the Voluntary Sector Network, Torbay Council and Torbay and South Devon NHS Foundation Trust made a shared commitment to develop the Community Helpline into an 'Open Front Door' to adult social care with anyone welcome to walk in.

The Helpline is a genuine product of community led co-design – a way of accessing wellbeing and prevention support which comes from, and is delivered by, the people of Torbay. Adult social care sits as an equal partner in the discussions of how best a person can be supported.

The Helpline is now the main way for people to access adult social care. The voluntary and community sector led wellbeing conversation with callers is wide ranging, covering every aspect of a person's life to identify both their issues and their potential. Callers are introduced to community and voluntary services, supported to help themselves and referred to adult social care if necessary.

The results speak for themselves:

- Since May 2021, 3,162 adults with possible social care needs have come through the Community Helpline
- 83% of these individuals' needs have been met by the Voluntary, Community, Faith and Social Enterprise sector
- 10% have been referred to Adult Social Care for an assessment
- 4% have been supported through joint working

Overall, we have learnt that statutory services must be humble, learn to really listen and be prepared to change their viewpoint. Co-design means accepting that someone else's idea might be the best one and the way forward may already be present in the community.

Building on existing community engagement

In delivering strong community engagement and neighbourhood empowerment, we will build on the existing community engagement taking place across Devon using our Three Pillars for Community Engagement and Empowerment as our foundation.

- Pillar 1: We will tackle local challenges We will create solutions in localities which focus on prevention and the strengths and assets of local communities. This will deliver effective place based services – where services are tailored to local population needs and council footprints.
- Pillar 2: We will develop locally owned solutions
 Strategies and plans will define a clear agenda and encourage local action.
 This will strengthen neighbourhoods and community support – where trust, relationships and prevention are built.

■ Pillar 3: Our practice will be evidence

and insight led
Integrating data will build rich pictures of local communities to better understand need and target support. Collaboration at the right scale will ensure sustainability, specialism and strategic coherence.

The existing councils in Devon, alongside our partners in the public sector, recognise and value the importance of a strong and vibrant voluntary sector in developing and maintaining a thriving place. We recognise and value that people and communities

want to be more involved, work together, improve relationships, and have better ongoing conversations. We also recognise the part that the private sector play in and with our communities.

There are examples of existing community engagement across Devon:

- 361 parish councils in Devon and 42 parish meetings (in parishes without parish councils)
- A long established network of successful Community Partnerships in Torbay.
- Torbay's Place Leadership Board which provides strategic place leadership locally, regionally, nationally and internationally – harnessing and aligning the power of the anchor institutions in Torbay.
- Strategic commissioning which has pioneered co-production through the Plymouth All-Age Unpaid Carers Strategy
- Networks of Community Builders in Plymouth and Torbay using strengthsbased approaches to help communities to help themselves.
- Natural environment programmes in Plymouth which have transformed relationships with environmental groups through practical volunteering and codesigned delivery; with a framework for Friends of Groups across Torbay working in our parks and green spaces.
- The pioneering Wellbeing Exeter partnership - an asset based system of community development activity embedded across the city, representing a strong alliance between the public and Voluntary, Community and Social

Enterprise sectors for community wellbeing activity, responding to complex system challenges.

LGR in Devon is about coming together – residents and community groups alike – to tackle challenges and make decisions side by side. The goal is to tap into the strengths already present in Devon's communities so that, by working together, we can create new solutions, launch shared projects, and ensure our local area is fair, resilient and inclusive throughout these changes.

Our vision will be realised through a transformational approach to local governance that positions councils as a facilitator, convener and advocate for empowered communities rather than simply a service provider.

LGR represents more than administrative change. It offers the opportunity to fundamentally reshape the relationship between local Government and the communities it serves, moving from traditional consultation models to genuine empowerment where residents have real influence over the decisions that affect their lives.

We want to establish a model of local Government which is modern, ambitious and innovative; empowers communities to release the remarkable social, cultural and economic potential of our County – improving the environment, supercharging our economy, addressing entrenched inequalities and delivering better outcomes for all.

As each council looks to establish neighbourhood governance within the framework of the enacted English

Devolution and Community Empowerment Bill, we will consider the principles of:

1. Stronger, simpler and strategic

Underpinned by the strength and simplicity of unitary councils, enabling a clear and unified voice for residents. Our framework will support strategic growth, attract investment and tackle complex challenges with greater coherence and impact.

2. Local empowerment and genuine engagement

A co-produced system will foster meaningful, ongoing engagement. It will prioritise collaboration over consultation, ensuring residents are active partners in shaping their communities.

3. Strengthening trusted local structures

Existing partnerships, including parish councils, which are valued by residents as trusted and accessible will be strengthened, not sidelined. Their deep local roots make them central to future engagement, ensuring neighbourhood governance remains grounded in community identity and trust.

4. Fair, representative and inclusive

There will be fair and equitable representation for all communities, addressing concerns about diluted voices. We will work to embed our statutory partners within our community networks, enabling residents to engage with the right people on the issues that matter.

Torbay Council - The Big Plan

We launched the new Torbay Learning Disability Partnership Board in December 2019. Nine Learning Disability Ambassadors are part of this Board, and they keep us informed about the things that are important to those who live in Torbay. This includes having a good quality home for life, relationships, independence, community and much more.

In the summer of 2023, people in Torbay with learning disabilities, their support workers, family, carers and health and social care workers were asked to give their views, at face to face events and through surveys, on a new Learning Disability Strategy called 'The Big Plan'. The plan focusses on making a positive difference to the lives of people with a learning disability.

Co-production of The Big Plan was important to us, so we made sure we went where people with learning disabilities are. We made use of channels used by people with learning disabilities as well as targeting health and social care professionals, support workers and local charities to ask for their views on our ideas.

This consultation also gave us the opportunity to strengthen and improve our relationship with people with learning disabilities and their support networks. We are now working more collaboratively and effectively with them as we progress the Plan.

As part of The Big Plan launch, our Ambassadors asked to arrange a public event with informative and interactive stands – The Big Event. They wanted people to come and find out more about what was on offer for people with learning disabilities in Torbay. The 41 organisations in attendance were all linked to the priorities of The Big Plan and ranged from financial support and education providers to health services and community groups. The Big Event was attended by 200 people.

The Big Plan, with The Big Event, helped improve existing networks and contacts with the community and develop new ones. We are now working with the Learning Disability Ambassadors to co-produce the long term implementation of The Big Plan. We are also working with the Ambassadors to reach out to their community to work with people with lived experience and look at all aspects of wellbeing.



Council size and representation

The challenge of democratic representation in LGR reflects the fundamental geography and settlement patterns of Devon.

The proposed Rural Devon Coast and Countryside Council would encompass a large and sparsely populated area, with a population of roughly 550,000 residents and an electorate of around 338,000, depending on the final configuration. In line with guidance from the Local Government Boundary Commission for England, which recommends a maximum of 100 councillors for any unitary authority, analysis indicates that the Devon Council would require between 70 and 100 councillors. The specific number would depend on the representation ratio ultimately adopted.

For instance, if the authority were to have 90 councillors, the representation ratio would be approximately 1 councillor for every 3,754 electors, a figure closely mirroring that of Northumberland, which operates at a ratio of 1:3,755. Alternatively, with 70 councillors, the ratio would increase to about 1:4,824 electors per councillor, approaching Cornwall's model of 1:4,956.

These ratios are reflective of the unique demands and practical considerations involved in serving extensive rural areas, while remaining within the parameters recommended by the Commission.

In contrast, the proposals for Plymouth and Exeter offer a democratic settlement tailored to compact urban geographies.

Plymouth's electoral review, previously paused by the Local Government Boundary Commission to await the outcome of this reorganisation, had established a council size of 60 councillors. Under the expanded Plymouth authority, which

would serve a population of roughly 300,000 and an electorate of around 222,000, it is anticipated that between 60 and 75 councillors would be required. This would equate to a representation ratio ranging from approximately 1:2,963 to 1:3,704 electors per councillor, ensuring that residents of parishes joining Plymouth maintain a close and effective link to their elected representatives.

Similarly, the new Exeter Council, with an estimated population of 260,000 and an electorate of around 177,000, would require between 60 and 75 councillors. This would result in ratios of around 1:2,463 to 1:2,956 electors per councillor, providing a level of representation comparable to Plymouth and well suited to the area's urban character.

For Torbay, the independent Local Government Boundary Commission for England published its final recommendations for electoral arrangements in 2017. Accordingly, it is proposed that Torbay would retain the boundaries and councillor numbers agreed in that review, with 36 councillors representing 16 wards. This approach ensures continuity and stability for Torbay's governance, building on the established framework set out by the commission.

Authority

Exeter

Estimated Population

260,000

Estimated Electorate

177,000

Proposed Councillor Numbers

54 - 62

Representation Ratio (Electors per Councillor)

60 councillors: 1:2,956 75 councillors: 1:2,365

These ratios are comparable to

Plymouth, tailored for an urban setting.

Authority Torbay

Estimated Population

140,000

Estimated Electorate

103,000

Proposed Councillor Numbers

36

Representation Ratio (Electors per Councillor)

1:2.850

Retains 16 wards and councillor numbers

as per the 2017 LGBCE review.

Authority

Rural Devon Coast and Countryside

Estimated Population

550,000

Estimated Electorate

338.000

Proposed Councillor Numbers

70 - 100

Representation Ratio (Electors per Councillor)

70 councillors: 1:4,824 90 councillors: 1:3,754

Reflects rural service demands with ratios similar to Northumberland and Cornwall.

Authority Plymouth

Estimated Population

300,000

Estimated Electorate

222,000

Proposed Councillor Numbers

60 - 75

Representation Ratio (Electors per Councillor)

60 councillors: 1:3,704 75 councillors: 1:2,963

Ensures the electorate has close links to representatives for both the existing city

and joining parishes.

Torbay Council - Torbay on the Move

The "Torbay on the Move" Active Workplace Challenge is an initiative designed to promote walking and wheeling, encouraging our residents to be more active.

The locally routed challenge aims to increase physical activity in and around the workplace. This enhances wellbeing, improves health, reduces carbon emissions and strengthens community connections. It encourages those taking part to track their progress on virtual journeys. It also offers an immersive experience where milestones are celebrated and real-time updates keep people motivated. It supports the development of a Champion Network to sustain engagement and promote active travel long term.

We are proud to have directly funded both the 2024 and 2025 Challenge and supported Active Devon with the promotion, both with our own workforce and to our partners. Torbay on the Move has influenced the Local Transport Plan and is informing the Healthy Weight Framework that is in development, regarding moving more for health and wellbeing benefits.

In 2025, 762 participants from 38 workplaces took part, an increase of 56% from 2024. A total of 103 teams were formed, with 45 completing the full virtual route. The participants walked over 227 million steps, equivalent to circling the globe four and a half times. As a result, 76 trees will be planted in Madagascar through the

challenge platform provider - Big Team Challenge.

The initiative encouraged an estimated 18,000 miles of active travel, reducing around 5.3 tonnes of CO2 emissions. Weekly challenges added variety and engagement, including pledges, nature photo submissions, distance goals, and personal reflections. A total of 39 prizes were awarded across teams and individuals.

Survey feedback showed strong impact: 57.5% of respondents considered active commuting, and 62% changed how they travelled during the challenge. 90% felt more connected to nature, and 58.1% reported stronger ties to their community. Additionally, 82.3% gained a better understanding of the health benefits of walking and wheeling. Workplace support was also evident, with 58.9% feeling encouraged to travel actively and 63.1% believing their workplace supports environmental sustainability.

Participants shared positive feedback, highlighting increased physical activity, improved mental wellbeing and stronger workplace morale. Many reported lasting changes to their routines, such as walking during lunch breaks or cycling to work.

The Active Workplace Challenge has proven to be a successful, inclusive and an impactful initiative across Torbay.



PART THREE

Implemention

This section provides, at a high level, how we propose to implement local Government reorganisation in Devon, together with our asks of Government to support successful implementation.



PART THREE

High level plan

Timetable

Our implementation plan is based around the Government's timeline which is set out below. Further clarification will be required around how this timeline would apply to Plymouth City Council as a continuing authority with extended boundaries.

Milestone	Timeline
Submission of final proposals	28 November 2025
Statutory Government consultation	Early 2026 - May 2026
Government's decision of local Government reorganisation in Devon	July 2026
Legislation laid in Parliament	Autumn 2026
Legislation made (subject to Parliamentary approval)	Late 2026/Early 2027
Elections to new unitary councils	6 May 2027
New arrangements go live (Vesting Day)	1 April 2028

While the process is separate to local Government reorganisation (LGR), we will continue to work collectively and with Government on moving towards the establishment of a Mayoral Strategic Authority (MSA).

Delivery phases

Phase 1: Development of proposal and mobilisation

- Our proposal will be submitted to Government by the deadline 28 November 2025
- The Secretary of State for Housing, Communities and Local Government will consider all proposals. They can decide to take forward proposals that are submitted by areas with or without modification.
- The Government will carry out a statutory consultation in accordance with the requirements of the legislation. This is likely to take place in spring 2026.

- Establish an LGR Programme across Devon including:
 - Establishing governance structures, workstreams, and financial controls with clearly defined responsibilities and reporting lines.
 - Developing a comprehensive implementation plan and timeline, with key milestones along the critical path.
 - Agreeing a communications and engagement strategy.
- Complete a baseline review of data across councils, identify key differences, and continue to build a shared data repository.
- Build cooperation and consensus between key stakeholders across central and local Government.

Phase 2: Preparation for implementation

Design and more detailed planning work will begin once the Government has decided on the future structure of local Government in Devon in summer 2026.

- Activities will begin to focus on establishing the unitary councils, with cross council coordination and delivery across all current authorities. Activities that will take place during this phase include:
 - Establishing formal governance and programme management arrangements to be taken forward into new shadow authorities.

- Developing and agreeing a detailed programme of implementation plans.
- Confirming future service requirements and target operating models, work will start on detailed service transition planning, including aligning existing change activity across the existing councils.
- Reviewing the baseline data around IT architecture, contract management and property portfolio.
- Agreeing a high level human resources transition plan.
- Agreeing an external communications strategy, as well as ongoing staff and trade union communications and engagement.
- Organise and implement the necessary arrangements for elections.
- Ensure full compliance with the Structural Changes Order, undertaking legal checks and providing assurance as required.

Phase 3: Shadow authorities

Shadow authorities are set up to support a smooth transition when local Government structures are changed. They are responsible for preparing for the new unitary councils to take on full local Government functions for Devon on Vesting Day (currently set by Government as 1 April 2028). It is expected these authorities will be in place one year prior to Vesting Day. This will include elections to shadow councils.

The shadow authorities will be made up of councillors and appointed officers who will oversee key activities, such as:

 Detailed integration planning and transition of services to the new unitary councils. This includes consideration of disaggregation of county services, aggregation of district and brough services and common services where they exist in all councils.

- Organisation and operating model design, refining initial structures for the new councils set out in the previous phase.
- Appointment of Chief Executives and other senior leadership roles.
- Staff transition processes, focused on the need to retain a skilled workforce with the right culture and planning for the TUPE of staff to new authorities; including ongoing staff and trade union engagement and communications.
- Budget setting for the new councils, including consolidation of funding arrangements such as council tax harmonisation and business rates collection.
- Establishment of payroll arrangements.
- Management of data as part of initial IT systems transition.
- Ongoing stakeholder engagement, including reinforcing current partnerships

and formation of new partnerships, where appropriate.

Phase 4: Launch of new councils

At the point that new councils formally come into existence on Vesting Day, greater focus can be placed on the long term strategy for the future authorities. Authorities will need to determine likely activities that could include:

- Establishing a transformation programme, within each unitary, with responsibility for confirming and implementing a target operating model for the new authorities.
- Further consolidation of existing systems and implementation of any new systems.
- Detailed review of existing contracts and third party spend, consolidating and rationalising spend whilst seeking to take advantage of economies of scale.
- Consolidation of fees and charges.
- Alignment of pay, terms and conditions.
- Ongoing change management and communications.

Key risks

We will adopt and apply the principles of effective risk management to support the transition to the new structures which will be agreed by the Government, including the establishment of the proposed MSA.

This approach will allow for us to consider risk to functional areas such as SEND, adult social care, children's services, planning, highways etc. as well as cross-cutting risks. Risks will be captured and assessed with

mitigations put in place for ongoing review and scrutiny.

Scale, complexity and pace of change

- Risk of difficulties collaborating or engaging with other councils, resulting in poor coordination during transition.
- Complexities in aggregating and

- disaggregating systems and data.
- Risk of service continuity issues due to contract termination, novation challenges, or supplier disputes.

Initial mitigations

- Establish a cross-authority LGR Governance Board with agreed terms of reference and clear governance framework.
- Establish dedicated workstreams with clear plans and contingencies.

Stakeholder support

 Risk of stakeholder disengagement or opposition during the transition period.

Initial mitigations

 Prepare and implement external engagement and communications strategy.

Performance

 Risk of reduction in performance across council service areas, including a lack of focus on ongoing transformation activity.

Initial mitigations

- Continue existing transformation boards.
- Consider how existing transformation boards sit within programme governance for LGR.
- Establish additional performance management controls.

Staffing

- Risk of reduced staff morale due to uncertainty, organisational change and perceived job insecurity during transition.
- Risk of loss of key personnel and corporate memory.
- Resistance to organisational change, cultural misalignment, and reduced productivity during restructuring.

Initial mitigations

- Establish a change management programme.
- Prepare and implement an internal engagement and communications strategy.
- Conduct early engagement with Trade Unions
- Plan for a structured approach to onboarding and induction into new organisations.

Finance

 Risk that actual transition costs exceed projections, reducing the savings achieved and impacting the overall financial case.

Initial mitigations

- Closely monitor transition costs.
- Contingencies have been built into transition costs.
- Adjust plans where necessary to ensure delivery remains within budget.

Our asks of Government

Based on the detailed financial sustainability analysis completed, we would welcome further discussions with Government to ensure smooth financial transitions for the new councils.

These must include consideration of the following options:

- Application of the standard flexibilities in relation to the use of capital receipts for transformation which will enable the four unitary councils to deliver the transitional arrangements at pace.
- Application of transitional flexibilities to facilitate support council tax harmonisation in Devon.
- Provision of national guidance for the division and re-distribution of balance sheet assets and liabilities arising from the reorganisation of council boundaries and resultant absorption of balances, assets and liabilities from predecessor authorities.

Aligned to the above we would welcome further consideration of the impact of the Government's funding reforms including the Fair Funding Review and Safety Valve agreements currently in place with Devon authorities.

