

Please reply to: Anne-Marie Bond
Chief Executive
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Ruth Miller, Co Deputy Director, Local
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Government

Via email:
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Date: 16 June 2026

Dear Ruth

Local Government Reorganisation in Devon – Structural Changes Order

Thank you for your letter dated 19 May 2026 seeking Torbay Council's views on the matters which will be necessary for the Secretary of State to consider in any Structural Changes Order.

We have considered the points in your letter and the presentation that your colleagues made to the Devon Chief Executives. We have had discussions with our Cabinet members and group leaders, as well as with the Leaders of the other Devon local authorities.

Below each specific question you asked, we have set out the principles we have applied to each of the proposals put forward for the future of local government in Torbay and whether consensus has been reached on these principles across each of the Councils in Devon. As an appendix we have set out our specific answers to your questions for each proposal.

1. Whether you would prefer a preparing council and implementation executive model (where geographies align) or a new council model with a joint committee?

We accept the MHCLG guidance that where the geographic boundary of an existing council is the same as the new unitary council, the existing council can be a preparing council and therefore an Implementation Executive is established rather than a Joint Committee. **This principle is agreed by all the councils in Devon.**

However, we support Plymouth City Council's position that, for each of the proposals which see its boundaries extended, it should be a Preparing Authority.

If you need this in a different format or language,
please contact me.

Other reasonable adjustments are available.



2. How many members from each relevant council would you prefer to sit on each Joint Committee or implementation executive, including the balance of members from different councils?

We have followed the advice of John Metcalfe, our MHCLG appointed advisor, on the proportionate split of seats between existing unitaries, the county council and the district/borough councils.

Each existing council making up the new unitary authority should have at least one seat on the Implementation Executive/Joint Committee. **This principle is agreed by all the councils in Devon.**

The smallest size of Implementation Executive/Joint Committee should be 8 members to enable efficient decision making.

The Implementation Executive/Joint Committee should be no greater than 16 members. **This principle is agreed by all the councils in Devon.**

3. Would you prefer for any individuals to be specified for the Chair/Deputy Chair roles, and if so, who?

If an Implementation Executive is established, the Leader of the preparing authority should be the chair of the Implementation Executive.

In the above case, the Vice Chair should be the Leader of a district/borough council forming part of the new unitary council.

If a Joint Committee is established, the chair will be elected at the first meeting.

4. What are your views on any requirement for political balance in the implementation executive/joint committee(s)?

Appointments to the Implementation Executive/Joint Committee should be made by each existing council in line with its own constitutional requirements. **This principle is agreed by all the councils in Devon.**

5. What would be your preferences for the membership of the Implementation Team and whether roles should be specified?

The Team should comprise of officers from all the existing authorities who are forming the new unitary council(s). **This principle is agreed by all the councils in Devon.**

The principle set out by MHCLG that the Chief Executive of the County Council should be the Implementation Team Leader is accepted by all the councils in Devon.

There should be Deputies in place for each new unitary and, where applicable, the Chief Executive of an existing unitary council should be the Deputy for any new authority that includes an existing unitary council.

6. Who should be the returning officer for the first election to each of the new unitary councils, that proposals would see established? (We anticipate that the SCO would specify the role at a particular council rather than an individual person)

We propose that the largest existing council by population forming part of the new unitary council should take the role of Returning Officer.

It is recognised that all existing Elections teams will need to work to deliver the elections.

This principle is agreed by all the councils in Devon.

7. Confirm if you would prefer the SCO to align future parish council elections with those of the new councils and set out when parish council elections currently take place across the four-year electoral cycle for each of the new council areas?

Parish council elections should be aligned to be held at the same time as elections to the new unitary authorities. **This principle is agreed by all the councils in Devon.**

There is only one parish council in Torbay – Brixham Town Council. Elections to Brixham Town Council are currently held on four yearly cycles which align with the local elections to Torbay Council.

The Returning Officers of the existing district and borough councils across Devon will be able to advise when parish council elections currently take place outside of Torbay.

8. What are the current legal names of the councils and what would be your preferred names for new councils?

The current legal names of the councils are:

- Devon County Council
- Torbay Borough Council
- Plymouth City Council
- Teignbridge District Council
- South Hams District Council
- West Devon Borough Council
- East Devon District Council
- Mid Devon District Council
- North Devon District Council
- Torridge District Council
- Exeter City Council

Our preferred names for the new councils are kept as simple as possible, whilst reflecting the area of representation. A full list of the proposed names is included within the appendix.

9. If different to proposals, has there been any further modelling of your preferred councillors for each new council that you would like the Secretary of State to consider, alongside any information on the rationale for the numbers?

Whilst taking account of the Local Government Boundary Commission for England guidance, and recognising the intention for a full boundary review within the first term of the new councils, we believe that those new or continuing councils serving purely urban areas in Devon should maintain the existing district ward boundaries and councillor numbers.

For those proposals which have proposed unitary councils serving a much wider geographic area, we believe that ratios of 1 councillor to 2,950 electors in urban areas and 1 councillor to 3,150 electors in rural areas should be applied. This ensures alignment with our first principle of those densely populated urban areas being fully represented.

Specific councillor numbers for each proposal are included within the appendix.

We will work with colleagues across Devon on the suggested warding arrangements for the authorities once a decision on local government reorganisation has been announced.

In the meantime, if you need any more clarification please do get in touch.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Anne-Marie Bond', written in a cursive style.

Anne-Marie Bond

Chief Executive

AREA: Devon – SCO preferences

RESPONDING AUTHORITY: Torbay Council

Total number of options under consultation: 5

LGR MODEL	3+ Unitary Model (Devon CC option)
CONTINUING AUTHORITIES (NO CHANGE)	Torbay Borough Council Plymouth City Council
NEW AUTHORITIES (NAMES)	Devon Council
FORMER COUNCILS	Devon County Council (DCC) South Hams District Council (SHDC) West Devon Borough Council (WDBC) Teignbridge District Council (TDC) Exeter City Council (ECC) North Devon Council (NDC) East Devon District Council (EDDC) Mid Devon District Council (MDDC) Torridge District Council (ToDC)
ARRANGEMENTS FOR NEW COUNCILS	
JOINT COMMITTEE/IMPLEMENTATION EXECUTIVE	Implementation Executive (DCC as Preparing Council)
MAKE UP	16 persons: 8 from DCC 8 from the Districts and Boroughs (1 each SHDC, WDBC, TDC, ECC, NDC, EDDC, MDDC, ToDC)
VOTING ARRANGEMENTS	<ul style="list-style-type: none"> • Majority voting of those present • Each member (including Chairperson of the committee) has one vote. • The person presiding at the meeting has a casting vote, in addition to any other vote the person may have.
CHAIR	Leader of Devon County Council Vice Chair from one of the district/borough forming part of the new unitary authority.
POLITICAL BALANCE	Appointments to the Implementation Executive should be made by each existing council in line with its own constitutional requirements.
TIMING OF JOINT COMMITTEE	<ul style="list-style-type: none"> • Not later than 14 days of the Order coming into force.

	<ul style="list-style-type: none"> • Dissolved on the day following the first meeting of the shadow authority.
IMPLEMENTATION TEAM	
TIMING	<ul style="list-style-type: none"> • Not later than 21 days after the coming into force of the Order to assist the Joint Committee in the discharge of their functions, and after its dissolution to assist the relevant shadow authority if so required.
IMPLEMENTATION TEAM MEMBERS	<ul style="list-style-type: none"> • One team comprising of officers from all Devon Councils (excluding Torbay Council and Plymouth City Council). • Lead Officer (Senior Responsible Officer (SRO)) to be appointed by MHCLG
FIRST ELECTION ARRANGEMENTS	
RETURNING OFFICER/S	Devon County Council with Districts as Deputies
ALIGNED PARISH AND NEW COUNCIL ELECTIONS	Yes
	District and Borough Returning Officers to confirm the parish council electoral cycle.
NUMBER OF COUNCILLORS	130

LGR MODEL	4+ Unitary Model (Torbay option)		
CONTINUING AUTHORITIES (NO CHANGE)	Torbay Borough Council		
NEW AUTHORITIES (NAMES)	Greater Plymouth Council	Exeter Council	Devon Council
FORMER COUNCILS	Plymouth City Council (PCC) (PARTLY) South Hams District Council (SHDC) Devon County Council (DCC)	Exeter City Council (ECC) (PARTLY) Teignbridge District Council (TDC) (PARTLY) Mid Devon District Council (MDDC) (PARTLY) East Devon District Council (EDDC) Devon County Council (DCC)	Devon County Council (DCC) West Devon Borough Council (WDBC) North Devon Council (NDC) Torridge District Council (ToDC) (PARTLY) South Hams District Council (SHDC) (PARTLY) Teignbridge District Council (TDC) (PARTLY) Mid Devon District Council (MDDC) (PARTLY) East Devon District Council (EDDC)
ARRANGEMENTS FOR NEW COUNCILS			
JOINT COMMITTEE/IMPLEMENTATION EXECUTIVE	Implementation Executive (Plymouth as preparing Council)	Joint Committee (New council model)	Joint Committee (New council model)
MAKE UP	8 persons: 4 from PCC 2 from SHDC 2 from DCC	8 persons: 4 from DCC 1 from TDC 1 from ECC 1 from EDDC 1 from MDDC	14 persons: 7 from DCC 7 from the Districts and Boroughs (1 each SHDC, WDBC, TDC, NDC, EDDC, MDDC, ToDC)
VOTING ARRANGEMENTS	<ul style="list-style-type: none"> • Majority voting of those present • Each member (including Chairperson of the committee) has one vote. • The person presiding at the meeting has a casting vote, in addition to any other vote the person may have. 		
CHAIR	Leader of Plymouth City Council	Not specified, to be selected at first meeting	Not specified, to be selected at first meeting

	Vice Chair from one of the district/borough forming part of the new unitary authority.			
POLITICAL BALANCE	Appointments to the Implementation Executive should be made by each existing council in line with its own constitutional requirements.	Appointments to the Joint Committee should be made by each existing council in line with its own constitutional requirements.	Appointments to the Joint Committee should be made by each existing council in line with its own constitutional requirements.	
TIMING OF JOINT COMMITTEE	<ul style="list-style-type: none"> • Not later than 14 days of the Order coming into force. • Dissolved on the day following the first meeting of the shadow authority. 			
IMPLEMENTATION TEAM				
TIMING	<ul style="list-style-type: none"> • Not later than 21 days after the coming into force of the Order to assist the Joint Committee in the discharge of their functions, and after its dissolution to assist the relevant shadow authority if so required. 			
IMPLEMENTATION TEAM MEMBERS	<ul style="list-style-type: none"> • One team comprising of officers from all Devon Councils (excluding Torbay Council) • Lead Officer (Senior Responsible Officer (SRO)) to be appointed by MHCLG • Deputy SRO for each new/continuing unitary authority, with the Chief Executive of an existing unitary council being the Deputy for any new authority that includes an existing unitary council. 			
FIRST ELECTION ARRANGEMENTS				
RETURNING OFFICER/S	Plymouth City Council with Districts as Deputies	Exeter City Council with Districts as Deputies	Devon County Council with Districts as Deputies	
ALIGNED PARISH AND NEW COUNCIL ELECTIONS	Yes District and Borough Returning Officers to confirm the parish council electoral cycle.	Yes District and Borough Returning Officers to confirm the parish council electoral cycle.	Yes District and Borough Returning Officers to confirm the parish council electoral cycle.	
NUMBER OF COUNCILLORS	68	86	131	
LGR MODEL	4+ Unitary Model (Plymouth and Exeter option)			
NEW AUTHORITIES (NAMES)	Torbay and South Devon Council	Greater Plymouth Council	Exeter Council	Devon Council
FORMER COUNCILS	Torbay Borough Council	Plymouth City Council	Exeter City Council	Devon County Council

	(TBC) (PARTLY) South Hams District Council (SHDC) (PARTLY) Teignbridge District Council (TDC) Devon County Council (DCC)	(PCC) (PARTLY) South Hams District Council (SHDC) Devon County Council (DCC)	(ECC) (PARTLY) Teignbridge District Council (TDC) (PARTLY) Mid Devon District Council (MDDC) (PARTLY) East Devon District Council (EDDC) Devon County Council (DCC)	(DCC) West Devon Borough Council (WDBC) North Devon Council (NDC) Torridge District Council (ToDC) (PARTLY) South Hams District Council (SHDC) (PARTLY) Teignbridge District Council (TDC) (PARTLY) Mid Devon District Council (MDDC) (PARTLY) East Devon District Council (EDDC)
ARRANGEMENTS FOR NEW COUNCILS				
JOINT COMMITTEE/IMPLEMENTATION EXECUTIVE	Joint Committee (New council model)	Implementation Executive (Plymouth as preparing Council)	Joint Committee (New council model)	Joint Committee (New council model)
MAKE UP	8 persons: 4 from TBC 2 from DCC 1 from SHDC 1 from TDC	8 persons: 4 from PCC 2 from SHDC 2 from DCC	8 persons: 4 from DCC 1 from TDC 1 from ECC 1 from EDDC 1 from MDDC	14 persons: 7 from DCC 7 from the Districts and Boroughs (1 each SHDC, WDBC, TDC, NDC, EDDC, MDDC, ToDC)
VOTING ARRANGEMENTS	<ul style="list-style-type: none"> • Majority voting of those present • Each member (including Chairperson of the committee) has one vote. • The person presiding at the meeting has a casting vote, in addition to any other vote the person may have. 			
CHAIR	No, to be selected at first meeting	Chair- Leader of the existing unitary Vice Chair from one of the district/borough forming part of the new unitary authority.	No, to be selected at first meeting	No, to be selected at first meeting

POLITICAL BALANCE	Appointments to the Joint Committee should be made by each existing council in line with its own constitutional requirements.	Appointments to the Implementation Executive should be made by each existing council in line with its own constitutional requirements.	Appointments to the Joint Committee should be made by each existing council in line with its own constitutional requirements.	Appointments to the Joint Committee should be made by each existing council in line with its own constitutional requirements.
TIMING OF JOINT COMMITTEE	<ul style="list-style-type: none"> • Not later than 14 days of the Order coming into force. • Dissolved on the day following the first meeting of the shadow authority. 			
IMPLEMENTATION TEAM				
TIMING	<ul style="list-style-type: none"> • Not later than 21 days after the coming into force of the Order to assist the Joint Committee in the discharge of their functions, and after its dissolution to assist the relevant shadow authority if so required. 			
IMPLEMENTATION TEAM MEMBERS	<ul style="list-style-type: none"> • One team comprising of officers from all Devon Councils • Lead Officer (Senior Responsible Officer (SRO)) to be appointed by MHCLG • Deputy SRO for each new/continuing unitary authority, with the Chief Executive of an existing unitary council being the Deputy for any new authority that includes an existing unitary council. 			
FIRST ELECTION ARRANGEMENTS				
RETURNING OFFICER/S	Torbay Council with Districts as Deputies	Plymouth City Council with Districts as Deputies	Exeter City Council with Districts as Deputies	Devon County Council with Districts as Deputies
ALIGNED PARISH AND NEW COUNCIL ELECTIONS	<p>Yes</p> <p>Brixham Town Council elections are currently held at the same time as local elections to Torbay Council.</p> <p>District and Borough Returning Officers to confirm the parish council electoral cycle for other parish councils in the area.</p>	<p>Yes</p> <p>District and Borough Returning Officers to confirm the parish council electoral cycle.</p>	<p>Yes</p> <p>District and Borough Returning Officers to confirm the parish council electoral cycle.</p>	<p>Yes</p> <p>District and Borough Returning Officers to confirm the parish council electoral cycle.</p>

NUMBER OF COUNCILLORS	64	68	86	103
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LGR MODEL	3+ Unitary Model (District Councils' (Main) option)	
CONTINUING AUTHORITIES (NO CHANGE)	Plymouth City Council	
NEW AUTHORITIES (NAMES)	Torbay and South Devon Council	North and East Devon Council
FORMER COUNCILS	Torbay Borough Council (TBC) South Hams District Council (SHDC) West Devon Borough Council (WDBC) Teignbridge District Council (TDC) Devon County Council (DCC)	Exeter City Council (ECC) Mid Devon District Council (MDDC) East Devon District Council (EDDC) North Devon Council (NDC) Torrige District Council (ToDC) Devon County Council (DCC)
ARRANGEMENTS FOR NEW COUNCILS		
JOINT COMMITTEE/IMPLEMENTATION EXECUTIVE	Joint Committee (New council model)	Joint Committee (New council model)
MAKE UP	12 persons: 6 from TBC 3 from DCC 1 from SHDC 1 from WDBC 1 from TDC	10 persons: 5 from DCC 1 from ECC 1 from EDDC 1 from MDDC 1 from ToDC 1 from NDC
VOTING ARRANGEMENTS	<ul style="list-style-type: none"> Majority voting of those present Each member (including Chairperson of the committee) has one vote. The person presiding at the meeting has a casting vote, in addition to any other vote the person may have. 	
CHAIR	Not specified, to be selected at first meeting	Not specified, to be selected at first meeting
POLITICAL BALANCE	Appointments to the Joint Committee should be made by each existing council in line with its own constitutional requirements.	Appointments to the Joint Committee should be made by each existing council in line with its own constitutional requirements.
TIMING OF JOINT COMMITTEE	<ul style="list-style-type: none"> Not later than 14 days of the Order coming into force. Dissolved on the day following the first meeting of the shadow authority. 	
IMPLEMENTATION TEAM		
TIMING	<ul style="list-style-type: none"> Not later than 21 days after the coming into force of the Order to assist the Joint Committee in the discharge of their functions, and after its dissolution to assist the relevant shadow 	

	authority if so required.	
IMPLEMENTATION TEAM MEMBERS	<ul style="list-style-type: none"> • One team comprising of officers from all Devon Councils (excluding Plymouth City Council). • Lead Officer (Senior Responsible Officer (SRO)) to be appointed by MHCLG • Deputy SRO for each new/continuing unitary authority, with the Chief Executive of an existing unitary council being the Deputy for any new authority that includes an existing unitary council. 	
FIRST ELECTION ARRANGEMENTS		
RETURNING OFFICER/S	Torbay Council with Districts as Deputies	Devon County Council with Districts as Deputies
ALIGNED PARISH AND NEW COUNCIL ELECTIONS	<p>Yes</p> <p>Brixham Town Council elections are currently held at the same time as local elections to Torbay Council.</p> <p>District and Borough Returning Officers to confirm the parish council electoral cycle for other parish councils in the area.</p>	<p>Yes</p> <p>District and Borough Returning Officers to confirm the parish council electoral cycle.</p>
NUMBER OF COUNCILLORS	104	136

LGR MODEL	3+ Unitary Model (District Councils' (Modified) option)		
NEW AUTHORITIES (NAMES)	Greater Plymouth Council	Torbay and South Devon Council	North and East Devon Council
FORMER COUNCILS	Plymouth City Council (PCC) (PARTLY) South Hams District Council (SHDC) Devon County Council (DCC)	Torbay Borough Council (TBC) (PARTLY) South Hams District Council (SHDC) West Devon Borough Council (WDBC) Teignbridge District Council (TDC) Devon County Council (DCC)	Exeter City Council (ECC) Mid Devon District Council (MDDC) East Devon District Council (EDDC) Torridge District Council (ToDC) North Devon Council (NDC) Devon County Council (DCC)
ARRANGEMENTS FOR NEW COUNCILS			
JOINT COMMITTEE/IMPLEMENTATION EXECUTIVE	Implementation Executive (Plymouth as preparing Council)	Joint Committee (New council model)	Joint Committee (New council model)
MAKE UP	8 persons: 4 from PLY 2 from DCC 2 from SHDC	12 persons: 6 from Torbay 3 from DCC 1 from SHDC 1 from WDBC 1 from TDC	10 persons: 5 from DCC 1 from ECC 1 from EDDC 1 from MDDC 1 from ToDC 1 from NDC
VOTING ARRANGEMENTS	<ul style="list-style-type: none"> • Majority voting of those present • Each member (including Chairperson of the committee) has one vote. • The person presiding at the meeting has a casting vote, in addition to any other vote the person may have. 		
CHAIR	Chair- Leader of the existing unitary Vice Chair from one of the district/borough forming part of the new unitary authority.	No, to be selected at first meeting	No, to be selected at first meeting
POLITICAL BALANCE	Appointments to the Implementation Executive should be made by each existing council in line with its own constitutional requirements.	Appointments to the Joint Committee should be made by each existing council in line with its own constitutional requirements.	Appointments to the Joint Committee should be made by each existing council in line with its own constitutional requirements.

TIMING OF JOINT COMMITTEE	<ul style="list-style-type: none"> • Not later than 14 days of the Order coming into force. • Dissolved on the day following the first meeting of the shadow authority. 		
IMPLEMENTATION TEAM			
TIMING	<ul style="list-style-type: none"> • Not later than 21 days after the coming into force of the Order to assist the Joint Committee in the discharge of their functions, and after its dissolution to assist the relevant shadow authority if so required. 		
IMPLEMENTATION TEAM MEMBERS	<ul style="list-style-type: none"> • One team comprising of officers from all Devon Councils • Lead Officer (Senior Responsible Officer (SRO)) to be appointed by MHCLG • Deputy SRO for each new/continuing unitary authority, with the Chief Executive of an existing unitary council being the Deputy for any new authority that includes an existing unitary council. 		
FIRST ELECTION ARRANGEMENTS			
RETURNING OFFICER/S	Plymouth City Council with Districts as Deputies	Torbay Council with Districts as Deputies	Devon County Council with Districts as Deputies
ALIGNED PARISH AND NEW COUNCIL ELECTIONS	<p>Yes</p> <p>District and Borough Returning Officers to confirm the parish council electoral cycle.</p>	<p>Yes</p> <p>Brixham Town Council elections are currently held at the same time as local elections to Torbay Council.</p> <p>District and Borough Returning Officers to confirm the parish council electoral cycle for other parish councils in the area.</p>	<p>Yes</p> <p>District and Borough Returning Officers to confirm the parish council electoral cycle.</p>
NUMBER OF COUNCILLORS	59	102	136