



Ministry of Housing,
Communities &
Local Government

15 May 2025

LOCAL GOVERNMENT REORGANISATION

INTERIM PLAN FEEDBACK: DEVON, PLYMOUTH AND TORBAY

To the Chief Executives of:

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

Overview:

Thank you for submitting your interim plans. The amount of work from all councils is clear to see across the range of options being considered. For the final proposal(s), each council can submit a single proposal for which there must be a clear single option and geography and as set out in the guidance we expect this to be for the area as a whole; that is, the whole of the area to which the 5 February invitation was issued, not partial coverage.

Our aim for the feedback on interim plans is to support areas to develop final proposal(s). This stage is not a decision-making point, and our feedback does not seek to approve or reject any option being considered.

The feedback provided relates to the following interim plans submitted by Devon, Plymouth and Torbay councils:

- Interim Plan submitted by 7 of the 8 Devon district councils (East Devon District Council, Mid Devon District Council, North Devon District Council, South Hams District Council, Teignbridge District Council, Torridge District Council and West Devon Borough Council) and Torbay Council
- Devon County Council Interim Plan
- Exeter City Council Interim Plan

- North Devon District Council Interim Plan
- Plymouth City Council Interim Plan
- Torbay Council Interim Plan

We have provided feedback on behalf of central government. It takes the form of:

1. A summary of the main feedback points,
2. Our response to the specific barriers and challenges raised in your plans,
3. An annex with more detailed feedback against each of the interim plan asks.

We reference the guidance criteria included in the invitation letter throughout, a copy can be found at [Letter: Devon, Plymouth and Torbay – GOV.UK.](#)

Our central message is to build on your initial work and ensure that the final proposal(s) address the criteria and are supported by data and evidence. We recommend that final proposal(s) should use the same assumptions and data sets or be clear where and why there is a difference.

We welcome the work that has been undertaken across proposals to develop local government reorganisation plans for Devon, Plymouth and Torbay. This feedback does not seek to approve or discount any option or proposal, but provide some feedback designed to assist in the development of final proposal(s). We will assess final proposal(s) against the guidance criteria provided in the invitation letter and have tailored this feedback to identify where additional information may be helpful in enabling that assessment. Please note that this feedback is not exhaustive and should not preclude the inclusion of additional materials or evidence in the final proposal(s). In addition, your named area lead, Christian Denison, will be able to provide support and help address any further questions or queries.

Summary of Feedback:

We have summarised the key elements of the feedback below, with further detail provided in the annex.

1. We welcome the steps some councils have taken to come together to prepare proposals (as per criterion 4).
 - a. **Effective collaboration between all councils across the invitation area will be crucial; we would encourage you to continue to build strong relationships and agree ways of working, including around effective data sharing. This will support the development of a robust shared evidence base to underpin final proposal(s).**
 - b. **It would be helpful if final proposal(s) use the same assumptions and data sets.**
 - c. **It would be helpful if your final proposal(s) set out how the data and evidence supports all the outcomes you have included, and how well they meet the assessment criteria in the invitation letter.**

- d. **You may wish to consider an options appraisal that will help demonstrate why your proposed approach in the round best meets the assessment criteria in the invitation letter compared to any alternatives.**
2. The final proposal(s) must specify the area for any new unitary council(s). If boundary change is part of your final proposal, then you should be clear on the boundary proposed and the justification.
 3. The criteria ask that a proposal should seek to achieve for the whole area concerned, the establishment of a single tier of local government (see criterion 1). **For the final proposal(s), each council can submit a single proposal for which there must be a clear single option and geography and as set out in the guidance we expect this to be for the area as a whole; that is, the whole of the area to which the 5 February invitation was issued, not partial coverage.**
 4. We recognise that plans are at an early stage and further analysis is planned in the run up to submitting the final proposal(s). **Further detail and evidence on the costs, efficiency savings and outcomes that are expected to be achieved would be welcomed.**
 5. In some of the options you are considering populations that would be above or below 500,000. As set out in the Statutory Invitation guidance and in the English Devolution White Paper, we outlined a population size of 500,000 or more. This is a guiding principle, not a hard target – we understand that there should be flexibility, especially given our ambition to build out devolution and take account of housing growth, alongside local government reorganisation. **All proposals, whether they are at the guided level, above it, or below it, should set out the rationale for the proposed approach clearly.**
 6. The criteria asks that consideration should be given to the impacts for crucial services such as social care, children’s services, SEND and homelessness, and for wider public services including for public safety (see criterion 3). **For any options where there is disaggregation, further detail will be helpful on how the different options might impact on these services and how risks can be mitigated.**
 7. With reference to the current Devon and Torbay Combined County Authority (CCA), further information would be helpful on the implications of the proposed local government reorganisation options for the governance arrangements in the Devon and Torbay CCA. It would also be helpful to outline how each option would interact with the CCA and best benefit the local community.

Response to specific barriers and challenges raised

Please see below our response to the specific barriers and challenges that were raised in your interim plans:

1. Reaching agreement in Devon and information sharing between councils

We note concerns raised about information sharing, and welcome commitments to collaborate across all councils, and commitment to share information. Data sharing is crucial to support the development of a robust and consistent evidence base to underpin final proposal(s).

2. Boundary changes and population size

We note your concerns on the 500,000 population figure and possible boundary changes. As explained above, in the Statutory Invitation guidance and in the English Devolution White Paper, we outlined a population size of 500,000 or more, this is a guiding principle, not a hard target – we understand that there should be flexibility, especially given our ambition to build out devolution and take account of housing growth, alongside local government reorganisation. All proposals, whether they are at the guided level, above it, or below it, should set out the rationale for the proposed approach clearly.

In relation to potential boundary changes, as the invitation letter sets out boundary changes are possible, but “existing district areas should be considered the building blocks for proposals, but where there is a strong justification more complex boundary changes will be considered”.

The final proposal must specify the area for any new unitary council(s). If a boundary change is part of your final proposal, then you should be clear on the boundary proposed, which could be identified by a parish or ward boundary, or if creating new boundaries by attaching a map.

Proposals should be developed having regard to the statutory guidance which sets out the criteria against which proposals will be assessed (including that listed above).

If a decision is taken to implement a proposal, boundary change can be achieved alongside structural change. Alternatively, you could make a proposal for unitary local government using existing district building blocks and consider requesting a Principal Area Boundary Review (PABR) later. Such reviews have been used for minor amendments to a boundary where both councils have requested a review – such as the recent Sheffield/Barnsley boundary adjustment for a new housing estate. PABRs are the responsibility of the Local Government Boundary Commission for England who will consider such requests case-by-case.

3. Impact on National Park Authorities

We note your concerns about the potential impact of local government reorganisation on the delivery functions of the National Park Authority, and we

would welcome further details on potential issues to understand what support may be needed.

4. Proposal Development Contributions

You asked about the provision of funding to enable ongoing analysis and testing of proposals. £7.6 million will be made available in the form of local government reorganisation proposal development contributions, to be split across the 21 areas. Further information will be provided on this funding shortly.

5. MHCLG and Government capacity

We note your concerns around central Government support for areas through the reorganisation process. You also asked for a single point of contact in central government to enable timely decision making and ongoing support. Christian Denison has been appointed as your MHCLG point person and is ready to engage with the whole area on issues you wish to discuss further.

6. National funding reforms

We note your concerns on the implication of funding reforms. Government recently consulted on funding reforms and confirmed that some transitional protections will be in place to support areas to their new allocations.

Further details on funding reform proposal(s) and transition measures will be consulted on after the Spending Review in June.

We will not be able to provide further clarification on future allocations in the meantime but are open to discussing assumptions further if we can assist in financial planning.

7. Transitional costs and financial frameworks

You have sought clarity on transitional costs and future funding frameworks and have sought guidance on the treatment of debt and assets. In terms of transitional costs, as per the invitation letter, we expect that areas will be able to meet transition costs over time from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects. In relation to debt, as per the invitation letter, the default position is that assets and liabilities remain locally managed by councils.

8. Elections

We note your concerns about the potential impact of the elections in May on timelines for local government re-organisation. We would be happy to arrange a meeting to discuss the feedback with all councils at a suitable time, though our working assumption is that elections will take place as planned.

9. NHS Settlement Locally

We note your concerns that the level of funding within the NHS locally will impact on local government. In the development of your final proposal(s), it would be helpful to evidence the impact on health and care service delivery in local government, including identified risks (along with a plan for mitigating those risks) and a consideration of workforce challenges.

10. Consultation

We note the interim plan sets out a range of engagement with stakeholders. Expectations on engagement and consultation are set out in the invitation letter.

Once a proposal has been submitted it will be for the Government to decide on taking a proposal forward and to consult as required by statute. The Secretary of State may not implement a proposal unless she has consulted with other councils affected by it and any other appropriate person. We are happy to engage further on these consultation requirements and the likely process for areas undergoing reorganisation in due course.

11. Legislative Framework & Consultation

You asked for confirmation of likely consultation arrangements, and guidance on the powers and responsibilities of new structures. Expectations on consultation and legislation are set out in the invitation letter. We are happy to engage further on the consultation requirements in statute and on the legislative arrangements for new councils.

12. Service Integration

You asked for support in developing robust service integration plans. We recognise that areas going through local government reorganisation will want advice and guidance on practical transition issues. The current sector support offer is outlined on the LGA's website. As the local government reorganisation programme evolves, we recognise the need to address more niche and complex matters. We are collaborating with the LGA and sector bodies to develop this. We encourage you to continue working with the LGA and sector bodies to identify and outline your future support needs, so these can be considered in the development of the long-term support offer. We would also encourage you to consider partnership options for joint working across the new unitaries for the delivery of social care services.

13. Rural and Coastal Needs

We note your concerns on the unique needs of Devon's large rural and coastal areas. Any proposal(s) will need to balance the needs of different areas and consider issues of local identity and cultural and historic importance.

14. Role of cities and major urban centres in unitary authorities.

You asked for clarity on the approach to specific issues faced by small cities in the context of local government reorganisation. Your proposal(s) should clearly set out the challenges faced and how the proposal(s) address these. Any proposal(s) will need to balance the needs of different areas and consider issues of local identity and cultural and historic importance.

15. Guidance and template for November business case

You asked about a template or guidance on the structure of the final proposal. We will support you to develop your final proposal(s). You can also draw on the support of the LGA. The current sector support offer is outlined on the LGA's website. As the local government reorganisation programme progresses, we recognise the need to address more niche and complex matters. We are collaborating with the LGA and sector bodies to develop the offer. We encourage you to continue working with the LGA and sector bodies to identify and outline your future support needs, so these can be considered in the development of the long-term support offer.

16. Continuing Authority

You asked for Government to confirm that Plymouth City Council would be a continuing authority in relation to your preferred option. You should set out in your final proposal how implementation would work and the assumptions underpinning this. Decision on the appropriate implementation and transition arrangements will be considered following final decisions on the proposal to be implemented.

17. Transitional Flexibilities

You asked for clarification over any transactional flexibilities regarding council tax harmonisation. Restructured councils often inherit different council tax levels from their predecessors. There is an established flexible system in legislation for the harmonisation of council tax levels over seven years.

18. Devon County Council's Safety Valve

You asked for clarification on the treatment of Devon County Council's Safety Valve agreement and residual Dedicated Schools Grant High Needs Block deficit.

The government has provided a £1 billion increase to Special Educational Needs and Disabilities (SEND) and Alternative Provision funding in 2025-26. This is an important step in realising the government's vision to reform England's SEND provision to improve outcomes and return the system to financial sustainability. The government will work closely with parents, teachers and local authorities to take forward this work.

We recognise the impacts that the Dedicated Schools Grant (DSG) deficits are having on councils' finances and will work with the sector on a way forward.

The government intends to set out plans for reforming the SEND system in further detail this year. This will include details of how the government will support local authorities to deal with their historic and accruing deficits and any transition period from the current SEND system to the reformed system. This will inform any decision to remove the DSG Statutory Override.

19. Assets and Liabilities

You asked for further information regarding assets owned and managed by individual councils, as well as any liabilities that may exist. The default position is that assets and liabilities remain locally managed by councils. There is existing legislation that makes provisions for the transfer of assets and liabilities in the context of local government reorganisation, namely. The Local Government (Structural Changes) (Transfer of Functions, Property, Rights and Liabilities) Regulations 2008.

20. Children's Services and SEND

You have noted your concern that as part of a larger unitary authority, the challenges currently being experienced by Devon County Council in relation to SEND will have a detrimental impact on children and young people in Torbay. In your final proposal(s) it would be helpful to see analysis, including potential benefits, risks and mitigations for the impact of local government reorganisation on SEND services.

ANNEX: Detailed feedback on criteria for interim plan

Ask – Interim Plan Criteria	Feedback
Identify the likely options for the size and boundaries of new councils that will offer the best structures for delivery of high-quality and sustainable public services across the area, along with indicative efficiency saving opportunities. Relevant criteria: 1 c) Proposals should be supported by robust evidence and analysis and include an explanation of the outcomes it is expected to achieve, including evidence of estimated costs/benefits and local engagement and 2 a-f) - Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks and 3 a-c) Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens	We welcome the initial thinking on the options for local government reorganisation in Devon, Plymouth and Torbay, and recognise that this is subject to further work. In your final proposal(s) we would welcome further detail that addresses the criteria in the invitation letter, and we note that this work has started. You may wish to consider an options appraisal against the criteria set out in the letter to provide a rationale for the preferred model against alternatives. For the final proposal(s), each council can submit a single proposal for which there must be a clear single option and geography and as set out in the guidance we expect this to be for the area as a whole; that is, the whole of the area to which the 5 February invitation was issued, not partial coverage. Where there are proposed boundary changes, the proposal should provide strong public services and financial sustainability related justification for the change. Proposals should be for a sensible geography which will help to increase housing supply and meet local needs, including future housing growth plans. All proposals should set out the rationale for the proposed approach Given the financial pressures you identify it would be helpful to understand how efficiency savings have been considered alongside a sense of place and local identity. We recognise that the options outlined in the interim plans are subject to further development. In final proposal(s) it would be helpful to include a high-level financial assessment which covers transition costs and overall forecast operating costs of the new unitary councils. We will assess final proposals against the criteria set out in the invitation letter. Referencing criteria 1 and 2, you may wish to consider the following bullets: • high level breakdowns for where any efficiency savings will be made, with clarity of assumptions on how estimates have been reached and the

	data sources used, including differences in assumptions between proposals • how efficiency savings have been considered alongside a sense of place and local identity. • information on the counterfactual against which efficiency savings are estimated, with values provided for current levels of spending • a clear statement of what assumptions have been made, and if the impacts of inflation are taken into account • a summary covering sources of uncertainty or risks with modelling, as well as predicted magnitude and impact of any unquantifiable costs or benefits • quantified impacts, where possible, on service provision as well as wider impacts We recognise that the interim plans acknowledge further work is needed on the financial assessment. The bullets below indicate where further information would be helpful across all options. As per criteria 1 and 2 it would be helpful to see: • additional data and evidence to set out how your final proposal(s) would enable financially viable councils, including identifying which option best delivers value for money for council taxpayers • further detail on potential finances of new unitaries, for example, funding, operational budgets, potential budget surpluses/shortfalls, total borrowing (General Fund), and debt servicing costs (interest and MRP); and what options may be available for rationalisation of potentially saleable assets • clarity on the underlying assumptions underpinning any modelling e.g. assumptions of future funding, demographic growth and pressures, interest costs, Council Tax, savings earmarked in existing councils' MTFs • financial sustainability both through the period to the creation of new unitary councils as well as afterwards We welcome the information provided in the plans on the potential impact and opportunities for service delivery from reorganisation. We would welcome further details on how services can be maintained where there is disaggregation, such as social care, children's services, SEND, homelessness, and for wider public services, including public safety.
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	Under criterion 3c) you may wish to consider: • how each option would deliver high-quality and sustainable public services or efficiency saving opportunities • what are the potential impacts of disaggregating services? • what would the different options mean for local services provision, for example: • do different options have a different impact on SEND services and distribution of funding and sufficiency planning to ensure children can access appropriate support, and how will services be maintained? • what is the impact on adults and children's care services? Is there a differential impact on the number of care users and infrastructure to support them among the different options? • what partnership options have you considered for joint working across the new unitaries for the delivery of social care services? • do different options have variable impacts as you transition to the new unitaries, and how will risks to safeguarding be managed? • do different options have variable impacts on schools, support and funding allocation, and sufficiency of places, and how will impacts on school be managed? • what impact will there be on highway services across the area under the different approaches suggested? • what are the implications for public health, including consideration of socio-demographic challenges and health inequalities within any new boundaries and their implications for current and future health service needs. What are the implications for how residents access services and service delivery for populations most at risk? We welcome the desire to maximise the opportunity for public service reform, and it would be helpful for you to provide more details on your plans so we can explore how best to support your efforts.
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Include indicative costs and arrangements in relation to any options including planning for future service transformation opportunities. Relevant criteria: 2d)Proposals should set out how an area will seek to manage transition costs, including planning for future service transformation opportunities from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects.	We welcome the indicative views, where provided, on the potential costs and the type of activity that this will fund. As per criterion 2, the final proposal(s) should set out how an area will seek to manage transition costs, including planning for future service transformation opportunities from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects: • within this it would be helpful to provide more detailed analysis on expected transition and/or disaggregation costs and potential efficiencies of proposals. This could include clarity on methodology, assumptions, data used, what year these may apply and why these are appropriate • detail on the potential service transformation opportunities and invest-to-save projects from unitarisation across a range of services -e.g. consolidation of waste collection and disposal services, and whether different options provide different opportunities for back-office efficiency savings • where it has not been possible to monetise or quantify impacts, you may wish to provide an estimated magnitude and likelihood of impact • summarise any sources of risks, uncertainty and key dependencies related to the modelling and analysis • detail on the estimated financial sustainability of proposed reorganisation and how debt could be managed locally We welcome the joint work you have done to date and recommend that all options and proposals should use the same assumptions and data sets or be clear where and why there is a difference (linked to criterion 1c).
Include early views as to the councillor numbers that will ensure both effective democratic representation for all parts of the area, and also effective governance and decision-making arrangements which will	As per criterion 6 in the invitation letter, we welcome the early view where that has been provided of councillor numbers, which we will be sharing with the Local Government Boundary Commission for England.

balance the unique needs of your cities, towns, rural and coastal areas, in line with the Local Government Boundary Commission for England guidance. Relevant criteria: 6) New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.	New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment. Additional details on how the community will be engaged, specifically how the governance, participation and local voice will be addressed to strengthen local engagement and democratic decision-making would be helpful. In final proposal(s) we would welcome detail on your plans for neighbourhood-based governance, the impact on parish councils, and the role of formal neighbourhood partnerships and area committees.
Include early views on how new structures will support devolution ambitions. Relevant Criteria: 5) New unitary structures must support devolution arrangements. a) Proposals will need to consider and set out for areas where there is already a Combined Authority (CA) or a Combined County Authority (CCA) established or a decision has been taken by Government to work with the area to establish one, how that institution and its governance arrangements will need to change to continue to function effectively; and set out clearly (where applicable) whether this proposal is supported by the CA/CCA /Mayor.	We note the general consensus for an MCA on a Devon or South West peninsula footprint. With reference to the current Devon and Torbay CCA, further information would be helpful on the implications of the proposed Local Government Reorganisation options for the governance arrangements in the Devon and Torbay CCA. It would also be beneficial to outline how each option would interact with the Devon and Torbay CCA and best benefit the local community. If final proposals envisage different devolution structures, it would be helpful for final proposals to clearly set out how these could work.
Include a summary of local engagement that has been undertaken and any views expressed, along with your further plans for wide local	We welcome your interim update against criterion 6, and the engagement undertaken so far and your plans for the future. It is for you to decide how best to engage locally in a meaningful and constructive way with residents, voluntary sector, local community groups,

engagement to help shape your developing proposals. Relevant criteria: 6a&b) New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment	Neighbourhood Boards, Parish councils, public sector providers such as health, police and fire, and local businesses to inform your proposals. For any option for two or more unitary councils, you may wish to engage in particular with those who may be affected by disaggregation of services. It would be helpful to see detail that demonstrates how local ideas and views have been incorporated into the final proposal(s).
Set out indicative costs of preparing proposals and standing up an implementation team as well as any arrangements proposed to coordinate potential capacity funding across the area. Relevant criteria: Linked to 2d) Proposals should set out how an area will seek to manage transition costs, including planning for future service transformation opportunities from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects.	We welcome the indicative cost as set out in some plans. We would welcome further detail in your final proposal(s) over the level of cost and the extent to which the costs are for delivery of the unitary structures or for transformation activity that delivers benefits. £7.6 million will be made available in the form of local government reorganisation proposal development contributions, to be split across the 21 areas. Further information will be provided on this funding shortly.
Set out any voluntary arrangements that have been agreed to keep all councils involved in discussions as this work moves forward and to help balance the decisions needed now to maintain service delivery and ensure value for money for council taxpayers, with those key decisions that will affect the future success of any new councils in the area. Relevant criteria:	We welcome plans to work together on the development of final proposal(s) (see criterion 4). Effective collaboration between all councils will be crucial; areas will need to build strong relationships and agree ways of working, including around effective data sharing. This will enable you to develop a robust shared evidence base to underpin final proposal(s) (see criterion 1c). In particular, as for the final proposal(s), as each council can submit a single proposal that must be a clear single option and geography for the area as a whole.

4 a-c) Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views	We recommend that final proposal(s) should use the same assumptions and data sets or be clear where and why there is a difference.
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