

Appendix 5 – Draft Covering Letter to the Secretary of State

The Rt Hon Steve Reed
Secretary of State for Housing, Communities and Local Government
Ministry of Housing, Communities & Local Government,
Fry Building
2 Marsham Street,
London SW1P 4DF

28 November 2025

Dear Secretary of State,

Submission of the 4-5-1 Model for Local Government Reorganisation in Devon

We are writing in response to your invitation to submit proposals for a single tier of local government in Devon. We are pleased to formally submit our comprehensive proposal, **"Reimagining Devon: Believe in Better,"** detailing the 4-5-1 model for local government reorganisation across Devon. This submission is supported by the District and Borough Councils in Devon, representing over 97% of the geography under consideration, and reflects a shared vision for a more sustainable and effective local government structure.

The 4-5-1 model proposes:

- A new Torbay and Southern Devon unitary (South Hams, Teignbridge, Torbay, and West Devon).
- A new Exeter and Northern Devon unitary (Exeter, East Devon, Mid Devon, North Devon, and Torridge).
- The retention of Plymouth as a unitary authority.

Our proposal is the result of an exhaustive, collaborative process designed to meet and exceed the six criteria set for unitary councils set out in your invitation. We are confident that this model provides the necessary strategic coherence, financial sustainability, and local accountability to unlock Devon's full potential.

We are clear that the approach must include two new unitary authorities alongside the retention of Plymouth City Council, as opposed to any 'continuing authorities'.

Responding to the Six Criteria

With a land area of over 6,000 square kilometres and a population in excess of 1.2m people, there are invariably a number of different options as to how current local

government structures could be reorganised. Our watchword throughout the development of this proposal has been balance. The 4-5-1 configuration creates an enduring equilibrium by balancing the need for the scale required for efficiency and resilience with a dedication to local responsiveness. This balance is demonstrated in the new authorities' compositions, which are configured to reflect a sense of place and the identity of existing communities along with travel-to-work areas and strategic infrastructure corridors, ensuring a fair distribution of population, economic output, and service demand.

The submission evidences a robust case for change, underpinned by a rigorous and evidence-led options appraisal process. This approach combined quantitative analysis of financial resilience and service delivery with qualitative assessments of community identity. We used independent financial modelling and a balance-based ranking system to ensure the final proposal is transparent, financially viable, and capable of withstanding future shocks, positioning the new authorities as future-proof and resilient for generations to come. Reorganisation costs are expected to be recouped within just three years with annual savings of £77m, reaching £124m in a stretch case scenario.

The proposal is founded on genuine collaboration across Devon. It is the result of successful, ongoing partnership between our councils over the course of this year including input from Torbay Council. Critically, this collaboration extended beyond the local authorities to an extensive public engagement campaign, receiving nearly 6,000 responses from residents, businesses, and community groups, directly shaping the final recommendation. Furthermore, the model embeds subsidiarity, empowering communities through co-designed Neighbourhood Area Committees, giving residents a stronger voice and fulfilling the commitment to stronger community engagement.

This 4-5-1 model also creates a credible platform for a future Mayoral Strategic Authority. Not only would this ensure fair representation and strategic balance for Devon, it would also provide a more equitable model for the inclusion of Cornwall, thereby directly supporting future devolution arrangements for peninsular. We have embraced the opportunity to put forward proposals for more efficient and effective councils. We believe the 4-5-1 model is the best solution for reorganisation based on existing local authority boundaries, delivering the essential savings, sustainability, and simplicity required, while remaining true to the unique identities of our communities.

Suggested modifications to Our Proposal

We have noted the Secretary of State's powers of modification in section 7 of the Act. To that end and were the Secretary of State so minded, we suggest that our Proposal might be modified by way of altering boundaries to better achieve our

ambition, while remaining simple and compliant with the six criteria were it not to be constrained by the requirement for proposals to be based on existing local authority boundaries. We are therefore suggesting modifications to boundaries (referred to as 4-5-1+ in our submission) supporting Plymouth's ambition to include parishes from the neighbouring South Hams District Council, that we would like you to consider should you be minded to implement the 4-5-1 proposal. We consider that these are not so extensive as to result in a different proposal and would be a reasonable exercise of your discretion.

An important caveat to this relates to those parts of the parishes that are also part of the Dartmoor National Park Authority. These should form part of the '4' authority, along with a small corner of the National Park that is currently within the administrative area of Mid Devon District Council.

We look forward to formal consultation in the New Year and are ready to support your team with any further information required to advance this essential change.

Yours sincerely