

## Response ID ANON-JB16-3B17-G

Submitted to Consultation on Proposals for Local Government Reorganisation in Devon, Plymouth and Torbay  
Submitted on 2026-03-18 15:45:57

### Tell us about yourself

1 What is your name?

Name:  
Annette Thom

2 Are you responding as an individual or providing an official response on behalf of an organisation?

Official response on behalf of an organisation

3 Are you providing the official response from a named consultee?

No

4 In which council area is your address? (if you are responding as an individual this is your home address. If you are responding as an organisation this is your organisation address)

Devon County Council

5 If you are responding on behalf of an organisation, please let us know the organisation's name:

Organisation:  
Blackawton Parish Council

6 If you are responding on behalf of an organisation, please let us know your position within the organisation:

Position in organisation::  
Clerk & RFO. Response prepared and agreed by the Councillors.

7 If you are responding on behalf of an organisation, please select the type of organisation from the options below:

Local government - parish/town council

8 What is your email address?

Email address::  
parishclerk@blackawtoncommunity.com

### Personal Data

1 Please read and tick the box before proceeding with the consultation

The sections for each proposal in this consultation include free text boxes where you can explain your answers. Please tick this box to confirm that you will not include information which may identify an individual in these boxes

### Consultation on the Proposal from Devon County Council.

1 To what extent do you agree or disagree that the proposal suggests councils that are based on sensible geographies and economic areas?

Dropdown answers:  
Somewhat agree

2 To what extent do you agree or disagree that the proposed councils will be able to deliver the outcomes they describe in the proposal?

Dropdown answers:  
Somewhat agree

3 To what extent do you agree or disagree that the proposed councils are the right size to be efficient, improve capacity and withstand financial shocks?

Dropdown answers:  
Somewhat disagree

4 To what extent do you agree or disagree that the proposed councils will deliver high quality, sustainable public services?

Dropdown answers:

Somewhat agree

5 To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?

Dropdown answers:

Strongly agree

6 To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements?

Dropdown answers:

Somewhat disagree

7 To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment?

Dropdown answers:

Neither agree nor disagree

8 If you would like to, please use the free text box to explain the answers you have provided to questions 1-7 referring to the question numbers as part of your answer. You may also use the box to provide any other comments you have on the proposal.

Text box to add further comments:

This proposal respects existing and familiar geographies. Whilst the larger unitary (excl. Plymouth & Torbay) would likely be able to deliver the outcomes described, there is inevitably some doubt about the ability of the two smaller unitaries (Plymouth & Torbay) to do so in the new Local Government framework. (Questions 1 & 2 refer)

The proposal would create one very large unitary on the Devon CC footprint and one much smaller one in Torbay – it is hard to understand how both of these can simultaneously be considered to be the right size. (Question 3 refers)

The large Devon unitary will clearly have the capacity to deliver high quality, sustainable public services but there would be concerns that the additional burden of taking on services currently provided by lower tier (District & City) authorities would result in an over-sized organisation that lacks agility, flexibility and the local focus that is essential to this delivery. (Question 4 refers)

There has been some public consultation on the proposal as submitted. The scale of the proposed Devon unitary suggests that there would be challenges in understanding and meeting specific local needs. (Question 5 refers)

In a future devolved position, there would be a clear imbalance between the voices and weight of the three constituent unitaries. This would risk making a Strategic Mayor for Devon (for example) essentially a proxy leader of the large unitary with limited input from the two smaller unitaries. (Question 6 refers)

Whilst the questions of community engagement and neighbourhood empowerment are addressed in the proposal there seems to be no clear pathway to achieving this in a way that 'has teeth'. Moreover, any such arrangements will presumably lie in the gift of the successor authorities, which may choose to adopt a different approach. (Question 7 refers).

9 I confirm that I have not provided any information that identifies an individual in the free text box.

Yes

Consultation on the Proposal from South Hams District Council, Teignbridge District Council, and West Devon Borough Council

1 To what extent do you agree or disagree that the proposal suggests councils that are based on sensible geographies and economic areas?

Dropdown answers:

Strongly agree

2 To what extent do you agree or disagree that the proposed councils will be able to deliver the outcomes they describe in the proposal?

Dropdown answers:

Somewhat agree

3 To what extent do you agree or disagree that the proposed councils are the right size to be efficient, improve capacity and withstand financial shocks?

Dropdown answers:

Somewhat agree

4 To what extent do you agree or disagree that the proposed councils will deliver high quality, sustainable public services?

Dropdown answers:

Somewhat agree

5 To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?

Dropdown answers:

Strongly agree

6 To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements?

Dropdown answers:

Strongly agree

7 To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment?

Dropdown answers:

Neither agree nor disagree

8 If you would like to, please use the free text box to explain the answers you have provided to questions 1-7 referring to the question numbers as part of your answer. You may also use the box to provide any other comments you have on the proposal.

Text box to add further comments:

South Hams, Teignbridge, West Devon, East Devon, Mid Devon, North Devon and Torridge proposals

We consider these two proposals to be materially the same. The marginal difference of including areas from four parishes currently in the South Hams would have the advantages of creating three somewhat better-balanced authorities and would be justifiable geographically as these areas already form part of the Plymouth urban fringe. However, this solution would have the disadvantage of creating additional complication in the allocation of debt and assets, transfer of services and the like. It would also remove a vital layer of local government from residents in the areas transferred to Plymouth.

These differences apart, the proposals are geographically coherent, creating three relatively well balanced unitaries in terms of size and building on the existing and established footprints of District, Borough and City Councils. (Question 1 refers).

Each new unitary would incorporate an existing upper tier or unitary authority (based in Plymouth, Exeter and Torquay respectively), with established links to their enlarged footprints. Whilst the Plymouth Unitary would be somewhat smaller than the government's guideline figure of 500,000 (in both variants) the new unitaries would be of sufficient size to deliver high quality services but still retain the agility and local focus inherent in their geographies.

It is recognised that there would be challenges in splitting current higher-tier services (adult social care, children's services) between the two newly-created north and south unitaries, some Devon County Council teams are already locally based and these risks could be mitigated by phased transitions and joint working as appropriate. (Questions 2, 3 & 4 refer)

The proposing authorities have conducted extensive local engagement within their areas, which cover the vast majority of the area. The new Councils seem to be sufficiently tightly drawn to allow a continued local focus and strong local representation. (Question 5 refers)

The three fairly equally sized unitary authorities created under these two proposals would have considerable scope to articulate well with future devolution arrangements and could build on the cooperation and engagement between areas as demonstrated in the preparation of these proposals. (Question 6 refers)

Whilst the questions of community engagement and neighbourhood empowerment are addressed in the proposals there seems to be no clear pathway to achieving this in a way that 'has teeth'. Moreover, any such arrangements will presumably lie in the gift of the successor authorities, which may choose to adopt a different approach. (Question 7 refers).

9 I confirm that I have not provided any information that identifies an individual in the free text box.

Yes

Consultation on the Proposal from East Devon Borough Council, Mid Devon District Council, North Devon Council, and Torridge District Council

1 To what extent do you agree or disagree that the proposal suggests councils that are based on sensible geographies and economic areas?

Dropdown answers:

Strongly agree

2 To what extent do you agree or disagree that the proposed councils will be able to deliver the outcomes they describe in the proposal?

dropdown answers:

Somewhat agree

3 To what extent do you agree or disagree that the proposed councils are the right size to be efficient, improve capacity and withstand financial shocks?

dropdown answers:

Somewhat agree

4 To what extent do you agree or disagree that the proposed councils will deliver high quality, sustainable public services?

Dropdown answers:

Somewhat agree

5 To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?

Dropdown answers:

Strongly agree

6 To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements?

Dropdown answers:

Strongly agree

7 To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment?

Dropdown answers:

Neither agree nor disagree

8 If you would like to, please use the free text box to explain the answers you have provided to questions 1-7 referring to the question numbers as part of your answer. You may also use the box to provide any other comments you have on the proposal.

Text box to add further comments:

We consider these two proposals to be materially the same. The marginal difference of including areas from four parishes currently in the South Hams would have the advantages of creating three somewhat better-balanced authorities and would be justifiable geographically as these areas already form part of the Plymouth urban fringe. However, this solution would have the disadvantage of creating additional complication in the allocation of debt and assets, transfer of services and the like. It would also remove a vital layer of local government from residents in the areas transferred to Plymouth. These differences apart, the proposals are geographically coherent, creating three relatively well balanced unitaries in terms of size and building on the existing and established footprints of District, Borough and City Councils. (Question 1 refers).

Each new unitary would incorporate an existing upper tier or unitary authority (based in Plymouth, Exeter and Torquay respectively), with established links to their enlarged footprints. Whilst the Plymouth Unitary would be somewhat smaller than the government's guideline figure of 500,000 (in both variants) the new unitaries would be of sufficient size to deliver high quality services but still retain the agility and local focus inherent in their geographies.

It is recognised that there would be challenges in splitting current higher-tier services (adult social care, children's services) between the two newly-created north and south unitaries, some Devon County Council teams are already locally based and these risks could be mitigated by phased transitions and joint working as appropriate. (Questions 2, 3 & 4 refer)

The proposing authorities have conducted extensive local engagement within their areas, which cover the vast majority of the area. The new Councils seem to be sufficiently tightly drawn to allow a continued local focus and strong local representation. (Question 5 refers)

The three fairly equally sized unitary authorities created under these two proposals would have considerable scope to articulate well with future devolution arrangements and could build on the cooperation and engagement between areas as demonstrated in the preparation of these proposals. (Question 6 refers)

Whilst the questions of community engagement and neighbourhood empowerment are addressed in the proposals there seems to be no clear pathway to achieving this in a way that 'has teeth'. Moreover, any such arrangements will presumably lie in the gift of the successor authorities, which may choose to adopt a different approach. (Question 7 refers).

9 This is a proposal that is accompanied by a request that the Secretary of State considers boundary change or that affects wider public services. To what extent do you agree or disagree that the proposal sets out a strong public services and financial sustainability justification for boundary change?

Dropdown answers:

Somewhat disagree

10 If you would like to, please use this free text box to explain your answer to question 9.

Text box to add further comments:

Whilst the expansion of Plymouth to include areas formerly in the Plymouth Urban Fringe designation of the Joint Local Plan has the advantage of 'tidying up' the boundaries of the city, we do not believe that the resulting benefits are sufficient to warrant the undoubted complications (in terms of division of assets and liabilities from former District Councils) and the 'postcode lottery' that this would create on a street-by-street level.

11 I confirm that I have not provided any information that identifies an individual in the free text boxes.

Yes

## Consultation on the Proposal from Exeter City Council and Plymouth City Council

1 To what extent do you agree or disagree that the proposal suggests councils that are based on sensible geographies and economic areas?

Dropdown answers:

Strongly disagree

2 To what extent do you agree or disagree that the proposed councils will be able to deliver the outcomes they describe in the proposal?

dropdown answers:

Somewhat agree

3 To what extent do you agree or disagree that the proposed councils are the right size to be efficient, improve capacity and withstand financial shocks?

dropdown answers:

Somewhat agree

4 To what extent do you agree or disagree that the proposed councils will deliver high quality, sustainable public services?

Dropdown answers:

Somewhat disagree

5 To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?

Dropdown answers:

Strongly disagree

6 To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements?

Dropdown answers:

Somewhat agree

7 To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment?

Dropdown answers:

Neither agree nor disagree

8 If you would like to, please use the free text box to explain the answers you have provided to questions 1-7 referring to the question numbers as part of your answer. You may also use the box to provide any other comments you have on the proposal.

Text box to add further comments:

Exeter, Plymouth and Torbay proposals

Whilst these two proposals appear similar, the substantial change to the boundaries of Torbay in the Plymouth & Exeter proposal would amplify the challenges identified below, with relatively few compensatory benefits. As both proposals cut across existing administrative boundaries, we believe that they would be complicated to implement in terms of the apportionment of assets and debt from existing authorities and the smooth transfer of services. The expansion of Plymouth and Exeter in both proposals is geographically incoherent. The proposed boundaries would cut across protected areas including the South Devon National Landscape, East Devon National Landscape and Dartmoor National Park, potentially complicating the management of these vital areas.

Although there is some geographical logic to the three unitaries proposed based around the existing urban centres of Plymouth, Torbay and Exeter, the fourth 'Coast & Countryside' unitary would be unwieldy and complex to manage. Whilst it is acknowledged that the social geography of this area is homogenous to some degree – the proposal is correct that it covers market towns, villages and rural communities – the internal differences and the lack of a unifying centre could threaten to make it unworkable. For Council operations, it is a 100 miles by road from Salcombe in the south to Lynton in the north, and 75 miles from Axminster in the east to Holsworthy in the west. In a County ill-served by rail and public transport more generally, it is very hard to see how this new unitary could be run in an efficient and effective way. (Question 1 refers)

It follows from the above that delivery of positive outcomes for the Coast & Countryside unitary would carry a considerable level of risk. Moreover, in terms of democratic representation, the expanded urban areas – whether three in number as in the Plymouth/Exeter proposal, or two as in the Torbay proposal – would risk the voices of residents being drowned out. (Question 2 refers)

In terms of populations numbers alone, the proposed unitary councils would be well balanced under the Exeter/Plymouth proposal but less so in the Torbay proposal. However, as noted above the physical size of the Coast & Countryside authority would present considerable risks in terms of efficiency and capacity. (Question 3 refers)

The Exeter/Plymouth proposal would see three urban hubs, with little experience or history in delivering services in rural areas, take on service delivery in large surrounding rural areas. This would carry significant risks in service delivery. This is addressed to some degree in the Torbay proposal, but only insofar as this challenge would not arise in Torbay. Under both proposals the risks to future service delivery in the Coast & Countryside authority would be significant, and there would be a considerable risk that equity of service delivery could not be achieved across the authority area. (Question 4 refers) We are aware that Plymouth City Council conducted engagement exercises with residents and organisations within the 13 parishes in the South Hams that it would join in the new Plymouth unitary. The results appear to show strong opposition to this aspect of the proposal. We can not comment on the engagement exercises conducted by Exeter. The expansion of Torbay under the Plymouth/Exeter proposal appears to have been introduced at the 11th hour and no consultation or engagement on this part of the proposal appears to have been carried out. (Question 5 refers)

The two proposals would produce four unitary authorities of relatively equal size, which could articulate well with future devolution arrangements. Again, however, the marked differences in terms of the nature and level of service demand between the three largely urban unitaries and the extensive Coast & Countryside unitary could threaten the logic of any devolved structure. (Question 6 refers).

Whilst the questions of community engagement and neighbourhood empowerment are addressed in the proposals there seems to be no clear pathway to achieving this in a way that 'has teeth'. Moreover, any such arrangements will presumably lie in the gift of the successor authorities, which may choose to adopt a different approach. (Question 7 refers).

9 This is a proposal that is accompanied by a request that the Secretary of State considers boundary change or that affects wider public services. To what extent do you agree or disagree that the proposal sets out a strong public services and financial sustainability justification for boundary change?

Dropdown answers:

Strongly disagree

10 If you would like to, please use this free text box to explain your answer to question 9.

Text box to add further comments:

There seems to be little operational or financial justification for the proposed boundary changes, which appear to be primarily an attempt to satisfy the government's guidelines on the sizes of future authorities. In terms of the provision of public services, the expansions of Plymouth, Exeter and Torbay would see largely urban authorities take on service delivery in highly rural areas in which they have little experience or expertise, despite the fact that such locations come with very specific challenges to efficient service delivery.

In addition, there are understandable concerns that the inclusion of surrounding parishes will lead to an imbalance in the governance and operation of the councils so created. It is to be expected that the majority of the elected representatives on the new authorities would be from their urban core, where issues and priorities are perhaps more homogenous, and that representation of the rural hinterlands would be constrained as a result.

11 I confirm that I have not provided any information that identifies an individual in the free text boxes.

Yes

## Consultation on the Proposal from Torbay Council

1 To what extent do you agree or disagree that the proposal suggests councils that are based on sensible geographies and economic areas?

Dropdown answers:

Somewhat agree

2 To what extent do you agree or disagree that the proposed councils will be able to deliver the outcomes they describe in the proposal?

dropdown answers:

Somewhat agree

3 To what extent do you agree or disagree that the proposed councils are the right size to be efficient, improve capacity and withstand financial shocks?

dropdown answers:

Somewhat disagree

4 To what extent do you agree or disagree that the proposed councils will deliver high quality, sustainable public services?

Dropdown answers:

Somewhat disagree

5 To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?

Dropdown answers:

Somewhat agree

6 To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements?

Dropdown answers:

Somewhat agree

7 To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment?

Dropdown answers:

Neither agree nor disagree

8 If you would like to, please use the free text box to explain the answers you have provided to questions 1-7 referring to the question numbers as part of your answer. You may also use the box to provide any other comments you have on the proposal.

Text box to add further comments:

#### Exeter, Plymouth and Torbay proposals

Whilst these two proposals appear similar, the substantial change to the boundaries of Torbay in the Plymouth & Exeter proposal would amplify the challenges identified below, with relatively few compensatory benefits. As both proposals cut across existing administrative boundaries, we believe that they would be complicated to implement in terms of the apportionment of assets and debt from existing authorities and the smooth transfer of services. The expansion of Plymouth and Exeter in both proposals is geographically incoherent. The proposed boundaries would cut across protected areas including the South Devon National Landscape, East Devon National Landscape and Dartmoor National Park, potentially complicating the management of these vital areas.

Although there is some geographical logic to the three unitaries proposed based around the existing urban centres of Plymouth, Torbay and Exeter, the fourth 'Coast & Countryside' unitary would be unwieldy and complex to manage. Whilst it is acknowledged that the social geography of this area is homogenous to some degree – the proposal is correct that it covers market towns, villages and rural communities – the internal differences and the lack of a unifying centre could threaten to make it unworkable. For Council operations, it is a 100 miles by road from Salcombe in the south to Lynton in the north, and 75 miles from Axminster in the east to Holsworthy in the west. In a County ill-served by rail and public transport more generally, it is very hard to see how this new unitary could be run in an efficient and effective way. (Question 1 refers)

It follows from the above that delivery of positive outcomes for the Coast & Countryside unitary would carry a considerable level of risk. Moreover, in terms of democratic representation, the expanded urban areas – whether three in number as in the Plymouth/Exeter proposal, or two as in the Torbay proposal – would risk the voices of residents being drowned out. (Question 2 refers)

In terms of populations numbers alone, the proposed unitary councils would be well balanced under the Exeter/Plymouth proposal but less so in the Torbay proposal. However, as noted above the physical size of the Coast & Countryside authority would present considerable risks in terms of efficiency and capacity. (Question 3 refers)

The Exeter/Plymouth proposal would see three urban hubs, with little experience or history in delivering services in rural areas, take on service delivery in large surrounding rural areas. This would carry significant risks in service delivery. This is addressed to some degree in the Torbay proposal, but only insofar as this challenge would not arise in Torbay. Under both proposals the risks to future service delivery in the Coast & Countryside authority would be significant, and there would be a considerable risk that equity of service delivery could not be achieved across the authority area. (Question 4 refers) We are aware that Plymouth City Council conducted engagement exercises with residents and organisations within the 13 parishes in the South Hams that it would join in the new Plymouth unitary. The results appear to show strong opposition to this aspect of the proposal. We can not comment on the engagement exercises conducted by Exeter. The expansion of Torbay under the Plymouth/Exeter proposal appears to have been introduced at the 11th hour and no consultation or engagement on this part of the proposal appears to have been carried out. (Question 5 refers)

The two proposals would produce four unitary authorities of relatively equal size, which could articulate well with future devolution arrangements. Again, however, the marked differences in terms of the nature and level of service demand between the three largely urban unitaries and the extensive Coast & Countryside unitary could threaten the logic of any devolved structure. (Question 6 refers).

Whilst the questions of community engagement and neighbourhood empowerment are addressed in the proposals there seems to be no clear pathway to achieving this in a way that 'has teeth'. Moreover, any such arrangements will presumably lie in the gift of the successor authorities, which may choose to adopt a different approach. (Question 7 refers).

9 This is a proposal that is accompanied by a request that the Secretary of State considers boundary change or that affects wider public services. To what extent do you agree or disagree that the proposal sets out a strong public services and financial sustainability justification for boundary change?

Dropdown answers:

Strongly disagree

10 If you would like to, please use this free text box to explain your answer to question 9.

Text box to add further comments:

There seems to be little operational or financial justification for the proposed boundary changes, which appear to be primarily an attempt to satisfy the government's guidelines on the sizes of future authorities. In terms of the provision of public services, the expansions of Plymouth, Exeter and Torbay would see largely urban authorities take on service delivery in highly rural areas in which they have little experience or expertise, despite the fact that such locations come with very specific challenges to efficient service delivery.

In addition, there are understandable concerns that the inclusion of surrounding parishes will lead to an imbalance in the governance and operation of the councils so created. It is to be expected that the majority of the elected representatives on the new authorities would be from their urban core, where issues and priorities are perhaps more homogenous, and that representation of the rural hinterlands would be constrained as a result.

11 I confirm that I have not provided any information that identifies an individual in the free text boxes.

Yes