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Extraordinary Council Meeting

Date: Wednesday, 19 March 2025

Time 7.30 pm

Venue: Council Chamber, Swale House, East Street, Sittingbourne, ME10 3HT

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To follow report and appendices added 14 March 2025

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Chief Executive, Swale Borough Council,
Swale House, East Street, Sittingbourne, Kent, ME10 3HT

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EXTRAORDINARY COUNCIL	
Meeting Date	19 March 2025
Report Title	English Devolution White Paper
EMT Lead	Larissa Reed – Chief Executive
Head of Service	Larissa Reed – Chief Executive
Lead Officer	Larissa Reed – Chief Executive
Classification	Open
Recommendations	<p>That Council:</p> <ol style="list-style-type: none"> 1. Notes the invitation received from the Minister for Local Government to work with other councils in Kent to submit a proposal for local government reorganisation. 2. Notes the contents of the draft interim plan that has been drafted in response to the invitation. 3. Agree not to sign up to any geographies or financial information at the current time. 4. Notes that a cross-party working group has been established to oversee discussions on this issue (and associated issues on devolution). 5. Delegates authority to the Chief Executive, in consultation with the Group Leaders to agree and submit the final proposal on 21 March 2025.

1 Purpose of Report and Executive Summary

- 1.1 The purpose of this report is to set out and explain the contents of the English Devolution White Paper and the invitation from Government to submit a proposal for local Government Reorganisation.

2 Background

- 2.1 On 16 December 2024 the Government published the '*English Devolution White Paper - Power and partnerships: Foundations for growth*' which made clear their intent to deliver both devolution and local government reorganisation. A report was taken to an Extraordinary Full Council on 4 February 2025 to outline the contents of the White Paper and the possible implications for the Council and the

Borough. A number of all-councillor briefings (written and verbal) have also been provided on the issue.

- 2.2 Following the publication of the White Paper, the Minister of State for Local Government and English Devolution, Jim McMahon OBE MP, wrote to council leaders inviting them to submit bids to be included in a 'Devolution Priority Programme (DPP)'. Kent and Medway councils submitted a bid to be included in the DPP to deliver mayoral devolution at pace. On 5 February 2025 we received notification that Kent had not been selected to be part of the DPP but we also received an invitation to submit a bid for Local Government Reorganisation. The letter stated "*I am writing to you to formally invite you to work with other council leaders in your area to develop a proposal for local government reorganisation, and to set out further detail on the criteria, guidance for the development of proposals, and the timeline for this process ... We ask for an interim plan to be submitted on or before 21 March 2025 ... I will expect any full proposal to be submitted by 28 November*".
- 2.3 The Government has stated that it expects local leaders to work collaboratively and proactively to produce robust and sustainable unitary proposals that are in the best interests of the whole area.
- 2.4 A copy of the letter is attached at Appendix A which sets out the criteria the government will be assessing reorganisation bids against and also a set of points that they expect interim plans (to be submitted by 21 March 2025) to address.
- 2.5 A draft county-wide response and covering letter has been put together which is attached at Appendices B and C . The response has been put together in a very short period of time and is subject to ongoing discussions between council leaders so may change between now and the date of submission. Additional supporting information and data is included in appendix D and council can include them in the final submission. Due to the fact that council has not had sufficient time to scrutinize and consider these appendices, it is not recommended that these are included.
- 2.6 Work is ongoing to establish one or more possible geographies (as set out in Appendix D) but, as the response makes clear, there is no consensus amongst Kent Council Leaders that there should be either three or four unitary councils within the county. The criteria set out by government and additional information provided in briefings to councillors and officers is that new unitary councils are expected to cover geographies of at least 500,000 people and to be made up of existing council boundaries. The views of partners are being sought and, following the interim submission, work will be undertaken to evaluate a number of specific proposals for unitary geographies.

2.7 The Government has made clear that it does not expect to make any decisions on unitarisation on the basis of the March submission and they have indicated that they will provide support to areas working up full proposals by the 28 November 2025 deadline. Accordingly, it is expected that Kent councils will procure one or more external partners to support them in this process and to ensure that options and the submission are independently evaluated. An informal cross-party working group of Leaders was established in January 2025, and they will continue to be appraised of progress and to provide oversight of both future Kent-wide submissions and of local associated work (including any work on a Community Governance review).

3.1 Alternative Options Considered and Rejected

3.2 Option 1 – that SBC does not put in a proposal on March 21 2025. This is not recommended as not being part of the process will limit any influence Swale Borough Council may have in the outcome of the process.

3.3 Option 2 – That SBC supports the full submission including appendices. This is not recommended due to the lack of time and scrutiny of the contents of the appendices, and the fact the not all Kent Councils have agreed to the contents of the appendices.

4. Consultation Undertaken or Proposed

4.1 Presentations have been given at each of the Area Committees, Local Council Liaison Forum, KALC SAC.

4.2 A public meeting was held on 12 March 2025 and key points are in appendix E.

5. Implications

Issue	Implications
Corporate Plan	The work required to create a new unitary authority is significant and is not currently part of the Corporate Plan. This would need to be reviewed
Financial, Resource and Property	The Government has suggested that there will be funds available to assist with the transition, however we currently do not know the details of this. There will be a significant financial impact on creating a new Unitary Authority.
Legal, Statutory and Procurement	The statutory deadline for the final business case is 28 November 2025. The submission of 21 March 2025 is not legally binding.

Crime and Disorder	There are no direct crime and disorder implications of this proposal
Environment and Climate/Ecological Emergency	There are no direct Environmental Emergency implications of this proposal
Health and Wellbeing	Although there is not direct Health and Wellbeing impact of this decision, there are significant benefits to have a unitary council who is able to link Health and Wellbeing outcomes to other priorities.
Safeguarding of Children, Young People and Vulnerable Adults	There are no direct safeguarding implications of this proposal
Risk Management and Health and Safety	There are no direct health and safety implications of this proposal
Equality and Diversity	There are no direct Equality and Diversity implications of this proposal
Privacy and Data Protection	There are no direct privacy or data protection implications of this proposal

6. Appendices

- Appendix A: Letter to Kent Council Leaders from MHCLG
- Appendix B: Draft Covering Letter for Draft Kent Wide Submission
- Appendix C: Draft Kent-wide interim submission to MHCLG
- Appendix D: Supplementary Information pack
- Appendix E: Notes from public meeting held on 12 March 2025

7. Background Papers

English Devolution White Paper: [English Devolution White Paper](#)

Kent Devolution Webpage: [Devolution - Kent County Council](#)



**Ministry of Housing,
Communities &
Local Government**

Jim McMahon OBE MP

*Minister of State for Local Government and
English Devolution*
2 Marsham Street
London
SW1P 4DF

Your reference:

Our reference:

To: Leaders of two-tier councils and
unitary council in Kent

Ashford Borough Council
Canterbury City Council
Dartford Borough Council
Dover District Council
Folkstone and Hythe District Council;
Gravesham Borough Council
Kent County Council
Maidstone Borough Council
Sevenoaks District Council
Swale Borough Council
Thanet District Council
Tonbridge and Malling Borough Council
Tunbridge Wells Borough Council
Medway Council

5 February 2025

Dear Leaders

This Government has been clear on our vision for simpler, more sustainable, local government structures, alongside a transfer of power out of Westminster through devolution. We know that councils of all political stripes are in crisis after a decade of decline and instability. Indeed, a record number of councils asked the government for support this year to help them set their budgets.

This new government will not waste this opportunity to build empowered, simplified, resilient and sustainable local government for your area that will increase value for money for council taxpayers. Local leaders are central to our mission to deliver change for hard-working people in every corner of the country through our Plan for Change, and our councils are doing everything they can to stay afloat and provide for their communities day in, day out. The Government will work closely with you to deliver these aims to the most ambitious timeline.

I am writing to you now to formally invite you to work with other council leaders in your area to develop a proposal for local government reorganisation, and to set out further detail on the criteria, guidance for the development of proposals, and the timeline for this process. A formal invitation with guidance for the development of your proposals is attached at Annex A. This invitation sets out the criteria against which proposals will be assessed.

Developing proposals for reorganisation

We expect there to be different views on the best structures for an area, and indeed there may be merits to a variety of approaches. Nevertheless, it is not in council taxpayers' interest to devote public funds and your valuable time and effort into the development of multiple proposals which unnecessarily fragment services, compete against one another, require lengthy implementation periods or which do not sufficiently address local interests and identities.

The public will rightly expect us to deliver on our shared responsibility to design and implement the best local government structures for efficient and high-quality public service delivery. We therefore expect local leaders to work collaboratively and proactively, including by sharing information, to develop robust and sustainable unitary proposals that are in the best interests of the whole area to which this invitation is issued, rather than developing competing proposals.

This will mean making every effort to work together to develop and jointly submit one proposal for unitary local government across the whole of your area. The proposal that is developed for the whole of your area may be for one or more new unitary councils and should be complementary to devolution plans. It is open to you to explore options with neighbouring councils in addition to those included in this invitation, particularly where this helps those councils to address concerns about their sustainability or limitations arising from their size or boundaries or where you are working together across a wider geography within a strategic authority.

I understand there will be some cases when it is not possible for all councils in an area to jointly develop and submit a proposal, despite their best efforts. This will not be a barrier to progress, and the Government will consider any suitable proposals submitted by the relevant local authorities.

Supporting places through change

It is essential that councils continue to deliver their business-as-usual services and duties, which remain unchanged until reorganisation is complete. This includes progress towards the Government's ambition of universal coverage of up-to-date local plans as quickly as possible. To support with capacity, I intend to provide some funds for preparing to take forward any proposal, and I will share further information later in the process.

Considering the efficiencies that are possible through reorganisation, 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.

The default position is that assets and liabilities remain locally managed by councils, but we acknowledge that there are exceptional circumstances where there has been failure linked to capital practices. Where that is the case, proposals should reflect the extent to which the implications of this can be managed locally, including as part of efficiencies possible through reorganisation, and Commissioners should be engaged in these discussions. We will continue to discuss the approach that is proposed with the area.

I welcome the partnership approach that is being taken across the sector to respond to the ambitious plans set out in the White Paper. My department will continue to work closely with the Local Government Association (LGA), the District Councils Network, the County Councils Network and other local government partners to plan how best to support councils through this process. We envisage that practical support will be needed to understand and address the key thematic issues that will arise through reorganisation, including managing service impacts and opportunities for the workforce, digital and IT systems, and leadership support.

Timelines and next steps for interim plans and full proposals

We ask for an interim plan to be submitted on or before 21 March 2025, in line with the guidance set out in the attached Annex. My officials will provide feedback on your plan to help support you to develop final proposals.

I will expect any full proposal to be submitted **by 28 November**. If I decide to implement any proposal, and the necessary legislation is agreed by Parliament, we will work with you to move to elections to new 'shadow' unitary councils as soon as possible as is the usual arrangement in the process of local government reorganisation.

Following submission, I will consider any and all proposals carefully before taking decisions on how to proceed. My officials are available throughout to discuss how your reorganisation and devolution aspirations might work together and what support you think you might need to proceed.

This is a once in a generation opportunity to work together to put local government in your area on a more sustainable footing, creating simpler structures for your area that will deliver the services that local people and businesses need and deserve. As set out in the White Paper, my commitment is that clear leadership locally will be met with an active partner nationally.

I am copying this letter to council Chief Executives. I am also copying this letter to local Members of Parliament and to the Police and Crime Commissioner.

Yours sincerely,

A handwritten signature in blue ink that reads "Jim McMahon". The signature is written in a cursive style with a large initial 'J'.

JIM MCMAHON OBE MP

Minister of State for Local Government and English Devolution

LOCAL GOVERNMENT AND PUBLIC INVOLVEMENT IN HEALTH ACT 2007**INVITATION FOR PROPOSALS FOR A SINGLE TIER OF LOCAL GOVERNMENT**

The Secretary of State for Housing, Communities and Local Government, in exercise of his powers under Part 1 of the Local Government and Public Involvement in Health Act 2007 ('the 2007 Act'), hereby invites any principal authority in the area of the county of Kent, to submit a proposal for a single tier of local government.

This may be one of the following types of proposal as set out in the 2007 Act:

- Type A – a single tier of local authority covering the whole of the county concerned
- Type B – a single tier of local authority covering an area that is currently a district, or two or more districts
- Type C – a single tier of local authority covering the whole of the county concerned, or one or more districts in the county; and one or more relevant adjoining areas
- Combined proposal – a proposal that consists of two or more Type B proposals, two or more Type C proposals, or one or more Type B proposals and one or more Type C proposals.

Proposals must be submitted in accordance with paragraphs 1 to 3:

1. Any proposal must be made by **28 November 2025**.
2. In responding to this invitation an authority must have regard to the guidance from the Secretary of State set out in the Schedule to this invitation, and to any further guidance on responding to this invitation received from the Secretary of State.
3. An authority responding to this invitation may either make its own proposal or make a proposal jointly with any of the other authorities invited to respond.

Signed on behalf of the Secretary of State for Housing, Communities and Local Government.



F KIRWAN

A senior civil servant in the Ministry of Housing, Communities and Local Government

5 February 2025

SCHEDULE

Guidance from the Secretary of State for proposals for unitary local government.

Criteria for unitary local government

- 1. A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government.**
 - a) Proposals should be for sensible economic areas, with an appropriate tax base which does not create an undue advantage or disadvantage for one part of the area.
 - b) Proposals should be for a sensible geography which will help to increase housing supply and meet local needs.
 - 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.
 - d) Proposals should describe clearly the single tier local government structures it is putting forward for the whole of the area, and explain how, if implemented, these are expected to achieve the outcomes described.

- 2. Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks.**
 - a) As a guiding principle, new councils should aim for a population of 500,000 or more.
 - b) There may be certain scenarios in which this 500,000 figure does not make sense for an area, including on devolution, and this rationale should be set out in a proposal.
 - c) Efficiencies should be identified to help improve councils' finances and make sure that council taxpayers are getting the best possible value for their money.
 - d) 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.
 - e) For areas covering councils that are in Best Value intervention and/or in receipt of Exceptional Financial Support, proposals must additionally demonstrate how reorganisation may contribute to putting local government in the area as a whole on a firmer footing and what area-specific arrangements may be necessary to make new structures viable.
 - f) In general, as with previous restructures, there is no proposal for council debt to be addressed centrally or written off as part of reorganisation. For areas where there are exceptional circumstances where there has been failure linked to capital practices, proposals should reflect the extent to which the implications of this can be managed locally, including as part of efficiencies possible through reorganisation.

3. Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens.

- a) Proposals should show how new structures will improve local government and service delivery, and should avoid unnecessary fragmentation of services.
- b) Opportunities to deliver public service reform should be identified, including where they will lead to better value for money.
- c) 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.

4. 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.

- a) It is for councils to decide how best to engage locally in a meaningful and constructive way and this engagement activity should be evidenced in your proposal.
- b) Proposals should consider issues of local identity and cultural and historic importance.
- c) Proposals should include evidence of local engagement, an explanation of the views that have been put forward and how concerns will be addressed.

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.
- b) Where no CA or CCA is already established or agreed then the proposal should set out how it will help unlock devolution.
- c) Proposals should ensure there are sensible population size ratios between local authorities and any strategic authority, with timelines that work for both priorities.

6. New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.

- a) Proposals will need to explain plans to make sure that communities are engaged.
- b) Where there are already arrangements in place it should be explained how these will enable strong community engagement.

Developing proposals for unitary local government

The following matters should be taken into account in formulating a proposal:

Boundary Changes

- a) Existing district areas should be considered the building blocks for your proposals, but where there is a strong justification more complex boundary changes will be considered.
- b) There will need to be a strong public services and financial sustainability related justification for any proposals that involve boundary changes, or that affect wider public services, such as fire and rescue authorities, due to the likely additional costs and complexities of implementation.

Engagement and consultation on reorganisation

- a) We expect local leaders to work collaboratively and proactively, including by sharing information, to develop robust and sustainable unitary proposals that are in the best interests of the whole area to which this invitation is issued, rather than developing competing proposals.
- b) For those areas where Commissioners have been appointed by the Secretary of State as part of the Best Value Intervention, their input will be important in the development of robust unitary proposals.
- c) We also expect local leaders to engage their Members of Parliament, and to ensure there is wide engagement with local partners and stakeholders, residents, workforce and their representatives, and businesses on a proposal.
- d) The engagement that is undertaken should both inform the development of robust proposals and should also build a shared understanding of the improvements you expect to deliver through reorganisation.
- e) The views of other public sector providers will be crucial to understanding the best way to structure local government in your area. This will include the relevant Mayor (if you already have one), Integrated Care Board, Police (Fire) and Crime Commissioner, Fire and Rescue Authority, local Higher Education and Further Education providers, National Park Authorities, and the voluntary and third sector.
- f) 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. This will be a completely separate process to any consultation undertaken on mayoral devolution in an area, which will be undertaken in some areas early this year, in parallel with this invitation.

Interim plans

An interim plan should be provided to Government on or before **21 March 2025**. This should set out your progress on developing proposals in line with the criteria and guidance. The level of detail that is possible at this stage may vary from place to place but the expectation is that one interim plan is jointly submitted by all councils in the area. It may be the case that the interim plan describes more than one potential proposal for your area, if there is more than one option under consideration. The interim plan should:

- a) identify any barriers or challenges where further clarity or support would be helpful.
- b) 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.
- c) include indicative costs and arrangements in relation to any options including planning for future service transformation opportunities.
- d) 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 balance the unique needs of your cities, towns, rural and coastal areas, in line with the Local Government Boundary Commission for England guidance.
- e) include early views on how new structures will support devolution ambitions.
- f) include a summary of local engagement that has been undertaken and any views expressed, along with your further plans for wide local engagement to help shape your developing proposals.
- g) 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.
- h) 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.



Kent
COUNCIL LEADERS

Jim McMahon OBE MP
Minister of State for Local Government and
English Devolution
2 Marsham Street
London SW1P 4DF

Kent Council Leaders
c/o Partnerships Team
County Hall
Maidstone
Kent ME14 1XQ

Phone: 03000 416 858
Ask for: Tim Woolmer
Email: kentcouncilleaders@kent.gov.uk

21 March 2025

Dear Minister of State,

Kent Interim Plan for Local Government Reorganisation

Thank you for your letter dated 05 February 2025 inviting Leaders of all 14 Local Authorities across Kent & Medway to submit an interim plan for reorganisation of Local Government in our county.

We are pleased to be able to respond collectively setting out our joint and collaborative approach to reorganisation. This includes where we have got to at this early checkpoint, our strong aspiration to be able to submit a full business case by the 28 November 2025 deadline and the plans in place to complete the work necessary in the interim to enable us to do so.

Whilst not currently included within the Devolution Priority Programme, we in Kent are still in the pursuit of the very best devolutionary arrangements for all of our residents and we are keen to ensure that any reorganisation is completed in full alignment with, and through the prism of, achieving full devolution at the earliest opportunity. To that effect, within our interim plan, we set out our rationale as for why that is so critical and specifically what makes Kent with our size and scale, coterminous boundaries, and strategic position as the international gateway to the UK exceptional in that regard.

We are grateful for the time you and your civil servants have set aside to work with us to this point and we look forward to continuing to work closely with your team and MHCLG colleagues in progressing our work around both devolution and reorganisation in the coming months.

Yours sincerely,

Kent and Medway Council Leaders

Noel Ovenden
Leader, Ashford Borough Council

Alan Baldock
Leader, Canterbury City Council

Jeremy Kite MBE
Leader, Dartford Borough Council

Kevin Mills
Leader, Dover District Council

Jim Martin
Leader, Folkestone & Hythe District Council

John Burden
Leader, Gravesham Borough Council

Roger Gough
Leader, Kent County Council

Stuart Jeffery
Leader, Maidstone Borough Council

Vince Maple
Leader, Medway Council

Roddy Hogarth
Leader, Sevenoaks District Council

Tim Gibson
Leader, Swale Borough Council

Rick Everitt
Leader, Thanet District Council

Matt Boughton
Leader, Tonbridge & Malling Borough Council

Ben Chapelard
Leader, Tunbridge Wells Borough Council

Leaders Draft - No 'Agreed', Signed-Off

Kent Interim Plan for Local Government Reorganisation



**USE OF LOGOS SUBJECT TO
EACH COUNCIL LEADER'S
SIGN-OFF**

Kent Interim Plan for Local Government Reorganisation

21 March 2025

This Interim Plan sets out the current position of Kent Council Leaders in developing proposals for local government reorganisation (LGR). The development of this plan has been led by Kent's Local Authority Leaders, through Kent's Leaders and Chief Executives' forums. By working collectively and collaboratively, this plan explores new unitary arrangements in Kent, as we aim to develop a solution that meets the needs of our residents and supports them for the future.

This Kent Interim Plan for Local Government Reorganisation has been agreed by the 14 Kent Council Leaders: (SUBJECT TO AGREEMENT)

Cllr Noel Ovenden, Ashford Borough Council

Cllr Alan Baldock, Canterbury City Council

Cllr Jeremy Kite, Dartford Borough Council

Cllr Kevin Mills, Dover District Council

Cllr Jim Martin, Folkestone and Hythe District Council

Cllr John Burden, Gravesham Borough Council

Cllr Roger Gough, Kent County Council

Cllr Stuart Jeffery, Maidstone Borough Council

Cllr Vince Maple, Medway Council

Cllr Roddy Hogarth, Sevenoaks District Council

Cllr Tim Gibson, Swale Borough Council

Cllr Rick Everitt, Thanet District Council

Cllr Matt Boughton, Tonbridge and Malling Borough Council

Cllr Ben Chapelard, Tunbridge Wells Borough Council

Introduction

Kent is a dynamic and ambitious region at the UK's gateway to continental Europe. As the country's primary trade link with Europe, Kent plays a crucial role in the national economy, benefiting from business, employment and population growth. With strong connections to London and the wider South East, Kent is home to key science and innovation assets, thriving sectors in food, life sciences, and manufacturing, and a vibrant cultural and creative economy. As a place where people want to live and businesses want to invest, the county is at the forefront of regeneration and economic development.

Against this backdrop of growth and opportunity, we are putting forward an Interim Plan for local government reorganisation that ensures Kent's governance structures are fit for the future. Our vision is to create a more effective, responsive, and sustainable system that maximises our county's potential while delivering the best outcomes for our communities and businesses.

We have a strong and productive history of working together as a large, complex group of 14 Authorities and have already had initial engagement with a wide range of partners as we work towards a single proposition for Kent, which not only addresses LGR but also responds to the wider agenda of public service reform. We recognise that there remains much more to do, including prioritising time to engage meaningfully with our residents, but we are confident, with our strong foundation of joint working built over many years, that we can formulate and deliver a solution that responds positively to all the criteria.

We are keen to explore how our submission for LGR can be aligned with an accelerated timetable for devolution (ideally to align with the timetable for LGR to facilitate local service reform, providing expected delivery and financial efficiencies. Because Kent was not chosen to be part of the Devolution Priority Programme (DPP), Kent County Council (KCC) elections are due to take place on the 1 May and KCC's position will obviously be subject to the views of any administration taking office once the election has taken place.

The structure of our submission follows the criteria set out in the Ministerial letter of 5 February 2025, but it has not been possible in the time available to engage as meaningfully as we would otherwise have hoped or to provide a detailed assessment against all of the criteria. In the submission that follows, 'Kent' is used to describe the geographical area covered by Kent County Council, Medway Unitary Council and all 12 District Councils.

A) Barriers or challenges where further clarity or support would be helpful.

Kent Council Leaders are keen to raise the following issues and challenges where we would appreciate either further clarity or support:

Geography

- Kent occupies a strategic position as the Gateway to Europe and is home to the Channel Tunnel in Folkestone and the Port of Dover – one of the busiest maritime passenger ports in the world – as well as the inland border facility at Sevington, near Ashford. Its geographical position between the continent and the rest of the UK mainland brings with it a range of unique and significant challenges including managing transport disruption (including requirements to stand up 'Operation Brock') and the new Entry/Exit Scheme. **We would want reassurance that any new unitary structures – particularly those responsible for the major points of entry – have sufficient financial resources to manage these challenges. Consideration would also need to be prioritised around how the major ports of entry (and associated infrastructure and statutory responsibilities) should be included within one or more unitary structure.**
- Similarly, Kent's position as the 'frontline county' also presents challenges and costs associated with the logistical, financial and other consequences of small boats and unaccompanied asylum-seeking children. **We would want to ensure that any future local government structures are designed and equipped with the capability to deal with the exceptional challenges we face and that our new Local Authorities are adequately supported as well as having sufficient financial resources to manage these challenges.**
- Some areas of the county are subject to widespread and significant planning constraints (either through designated protections, viability gaps or nutrient neutrality and coastal constraints). **We would want government to ensure that any agreed geographies take account of such planning constraints in the context of planning delivery targets and to work proactively with the government and Homes England and Natural England to agree an approach to addressing issues of viability and nutrient neutrality which act as impediments to housing delivery.**

Finances

- Like all areas of the country, some of our Local Authorities including our upper-tier Councils have levels of debt consistent with the sector as a whole whilst some of our District Councils are debt-free. As we determine our new geographies, our priority as Leaders is to ensure that any of our new entities will have stable financial foundations and as a result the best opportunity to be economically viable. **We would therefore want a discussion with government to agree how legacy debt is managed, apportioned and reassurance that the new Unitary Authorities have the financial headroom to manage the associated debt interest payments.**
- There is significant variation in levels of Council Tax, taxbase and potential for generating income across the county. Any LGR would need to be preceded by a thorough financial analysis (which, for Kent, will be complex given the number of Local Authorities involved). We will use this analysis (which is underway) to inform both our preferred structure and innovation in service delivery.
- Many Kent Councils face exceptional issues relating to both cost and demand pressures with some arising specifically from our geography – in particular, associated with unaccompanied asylum-seeking children, adult social care, children's services (including home to school transport), homelessness and contract inflation. Whilst we will do all we can to deliver efficiency savings and value for the taxpayer from any process of local government reorganisation we are

concerned that any new Unitary Authorities should be financially resilient and self-sufficient. **We would want to discuss additional opportunities for fiscal devolution to support this.**

- There is an absence of agreed government funding to support the work required to develop proposals and move towards new Unitary Councils. **We would be looking for government to fund the cost of working up and implementing proposals for moving to new unitary structures** (including those set out under section G below) **and the significant restructuring and disaggregation costs for existing upper tier responsibilities such as adults and children's services** and would emphasise the New Burdens Doctrine (the requirement that any new burdens should be properly assessed and fully funded by the relevant department).
- There are areas of Kent in receipt of significant government funding from multiple departments associated with challenges including town centre and coastal deprivation and transformation, highways, public health interventions, border-related issues, and many more. There will be understandable concern that this funding should remain in the areas to which it was allocated. We would appreciate a discussion to understand whether and how this can be achieved.
- There are eight Councils with Housing Revenue Accounts (HRAs) across Kent, all are at different positions regarding financial stability and investments. Advice is sought about how the housing regulator expects the amalgamation of these accounts will ensure that tenants are treated fairly.

Representation and Localism

- Kent is a large and diverse county with significant differences across the county in terms of geography, deprivation, rurality, economic growth, unemployment, benefits uptake and more. **We are keen that staff and elected officials of any new Councils would be sufficiently representative of our diverse communities and would be keen to engage with government to understand whether any support can be given to develop mechanisms to promote local representation and accountability.**
- Councillors are clear of the need to ensure strong democratic representation for the new Unitary Councils that reflects the diversity and make-up of its residents. Councillors are concerned about the specified minimum population thresholds and the maximum suggested Councillor numbers and what this might mean for the ratio of elected Councillors to population. **We would want the government to consider the diversity of Kent's population and geography in determining any unitary geographies and to support local identity as expressed by residents alongside financial viability.**

Planning and the NPPF

- Kent Councils fully recognise the government's stated intention (and firm commitment) to deliver 1.5 million homes within the lifetime of the Parliament and the majority of Kent Councils have seen increases in housing delivery targets (some of them are very significant increases). There are major housing sites across the county and ensuring delivery momentum is maintained is a critical consideration through LGR. Councils are at various stages of developing and adopting their local plans and **we would be keen to discuss with government how we manage the transition from existing Local Planning Authorities to new Local Planning Authorities and from existing local plans to new local plans with a view to maximising delivery and minimising abortive costs and work. Maintaining the momentum of the Collaboration Agreement with Homes England in delivering the Garden Town at Otterpool Park and Heathlands Garden Community in Maidstone, while unblocking nutrient neutrality across Ashford and Canterbury, will be key considerations of a new Unitary Council.**

Devolution

- Whilst Kent was not prioritised for the Devolution Priority Programme both the Minister and officials have suggested that it might be possible for Kent to be considered as part of any future ‘waves’ of devolution. There are a number of critical economic development functions that sit most appropriately at a county-wide level and which we would be looking to be subsumed into any Combined County Authority (CCA)/Mayoral Strategic Authority (MSA)/Established Mayoral Strategic Authority (ESA) (e.g. ‘Visit Kent’, ‘Locate in Kent’) and **we would appreciate support to ensure that we can align the delivery of new unitary structures with a devolution deal to protect these important place-based pan-county services.**

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B) 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.

Given that Kent includes a county, 12 Districts and a Unitary Council, we will be looking to make a 'Combined proposal', in line with proposal types outlined in Ministerial letter of 5 February 2025. We are also clear that we would not collectively support either fewer than three or more than four unitaries within Kent given the criteria set out by the government, the population of Kent (current and future projected) and various other factors including identity, economic geographies, travel to work areas, public sector alignment, the resilience of service delivery and the need for appropriate political representation.

Work is underway to identify a preferred proposition which will feature in the full proposal (to be submitted by 28 November 2025). Our intention is to produce a single preferred model, but we recognise that this might not be possible (and that it might be necessary to submit alternative proposals).

One issue that is presenting a challenge to us is the tension between the 'floor' of 500,000 population and how this manifests itself geographically and how it sits alongside concerns we have about scale, identity, localism, and the need to provide effective democratic representation to respond to the unique needs of our local communities. Accordingly, we would welcome the minister's view on taking forward the three and four Unitary proposals and the Minister's willingness to consider options that significantly change several District/Borough boundaries.

C) Include indicative costs and arrangements in relation to any options including planning for future service transformation opportunities.

Kent Council Leaders are agreed that any future geography for new Unitary Councils is likely to be on the basis of either 3 or 4 Unitary Councils. The precise geography for each is still being determined, underpinned by analysis of financial, demographic and service demand data, travel to work areas, population sizes, spatial planning constraints and alignment with existing statutory partner boundaries and most importantly the views of our residents and how they identify with an area. This makes it hard to model indicative costs and transformation opportunities at this stage. Nevertheless, work continues at pace, and we would like to establish continued dialogue with government officials as it progresses at regular intervals.

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D) 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 balance the unique needs of your cities, towns, rural and coastal areas, in line with the Local Government Boundary Commission for England guidance.

Kent Council Leaders are clear that any new unitary structures must provide for effective democratic representation for residents.

We have given some thought to broad Councillor/elector ratios using the criteria set out by the LGBCE (Local Government Boundary Commission for England). For a three unitary model, the crude ratio would be 6,333 electors by population, and 4,496 electors by electorate to each Councillor and for a four unitary model, the ratio would be 4,750 by population and 3,372 by electorate (based on the LGBCE guidance of a maximum of 100 Councillors per unitary). These figures are in line with ratios elsewhere in the country. Further work will be undertaken on this before the November 2025 submission, including the potential for the initial set up of unitaries to have a slightly higher figure, reducing over a manageable period of time to align with the guidance.

Whichever model is chosen, we would be looking to design in mechanisms by which we could enhance and amplify democratic representation and local place engagement. This includes a focus on ensuring future Councillors are genuinely representative of the diversity of Kent's residents and communities. We have been engaging with Kent Association of Local Councils (KALC) and are exploring ways in which we can devolve greater powers, funding and responsibilities to Parish and Town Councils.

A number of District Councils are exploring the potential for community governance reviews where there are geographical areas without existing Parish or Town Councils.

We are also engaging with other areas that have been through recent processes of LGR to establish other ways in which we can engage local areas and localise decision-making. There are further opportunities to explore as proposals are developed about the use of Area Committees by the new unitaries to provide meaningful reach to local communities. Functions and funding can be matters delegated by the new Councils under their constitutional arrangements and there are examples elsewhere in the country that offer a tried and tested route map. In addition, the future role of Town & Parish Councils is a matter for further work as proposals are developed.

E) Include early views on how new structures will support devolution ambitions.

We note the Minister’s view that Kent would benefit from delivering LGR before a mayoral institution is established and we are keen to explore whether and how we could deliver devolution in parallel with our proposals for LGR and to use the opportunity to explore wider public sector reform (including the potential for some current Council functions to be delivered at MSA level). Our proposals are likely to include unitaries of roughly equal size which would address the concerns set out in our DPP response letter. In view of the need for a number of services to be delivered cost-efficiently on a pan-county basis, the imperative to determine further clarity on the relationship between LGR and devolution for areas not on the DPP and the likely timeline for devolution for Kent is an urgent request of government.

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F) Include a summary of local engagement that has been undertaken and any views expressed, along with your further plans for wide local engagement to help shape your developing proposals.

We believe that local engagement should be meaningful and not rushed, particularly given that the nationally the government narrative has focused on devolution rather than local government reorganisation. Kent Councils already have mechanisms in place to promote ongoing dialogue with other public sector bodies with lead representatives from Kent Police, the Police and Crime Commissioner (PCC), Kent Fire and Rescue Service, Department for Work and Pensions (DWP) and Health all attending meetings of 'Joint Kent Chief Executives'. In addition, all Councils have undertaken extensive staff and Councillor engagement, and many have utilised existing forums to engage residents, partners and businesses (e.g. Business Improvement Districts (BIDs), meetings of parish chairs and local strategic partnerships). The two major universities in the area have been engaged at both District (where they operate within a District boundary) and County/Unitary level.

In terms of messages that are emerging, partners are keen to be engaged meaningfully in the process, to explore how any changes could promote a whole 'systems thinking' approach and promote a preventative agenda and to ensure that public sector investment is most efficiently made with delivery geographies aligned to the best extent possible. Engagement with staff has led to some concerns being expressed about uncertainty/lack of clarity, capacity, potential conflicts between doing the right thing for current organisations whilst protecting the position of new organisations, skills shortages and issues with recruitment and retention (there is already a suggestion that the uncertainty associated with LGR is impacting on people's willingness to apply for roles).

As part of the local engagement for this Interim Plan, we reached out directly to our strategic partners and a range of stakeholders, to ask for initial views and comments on LGR in Kent. This includes NHS Kent and Medway, Kent Fire and Rescue Services, Kent Police and PCC, businesses, education sector, housing sector, the VCSE sector and Kent MPs. The responses supported reorganising local government in Kent, with most favouring a three or four unitary Council model to improve efficiency and streamline services. There is strong recognition of the need to maintain continuity in frontline services, particularly social care. Many emphasise collaboration between Councils, businesses, and community groups to create a unified approach. The importance of maintaining local identity and engaging stakeholders was also highlighted to ensure a smooth transition.

Reorganisation was seen as an opportunity to reduce costs, enhance regional planning, and improve service delivery. Some stress the need to align new structures with existing service areas, particularly in education, healthcare, economy, policing, and housing, to prevent disruption. While there is broad agreement on the benefits of Unitary Councils, opinions differ on the ideal number, with some favouring larger Authorities for financial resilience and others preferring a more localised approach. Concerns were raised about the absence of a directly elected mayor and the initial separation of LGR and devolution as a result of Kent not being on the DPP. The overall focus is on achieving a more efficient, effective governance structure while ensuring strong community representation and service continuity.

The Councils will undertake wider engagement before submitting the full November 2025 proposal and will set out the results as part of the proposal.

G) 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.

We would seek government support (under the New Burdens Doctrine) to meet the costs of scoping up, preparing for and managing any transition to unitary structures including:

- Support from a Strategic Partner to produce the initial and developed business plan
- Survey work to produce both qualitative and quantitative feedback on proposals.
- Costs associated with any additional elections
- Costs associated with the running of any shadow Unitary Councils (including members' allowances, statutory officers and other necessary staff for the shadow period)
- Programme and project management support
- Implementation support (including miscellaneous professional and consultancy fees – including property valuation, legal advice, HR support and redundancy cost).

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H) 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.

Kent Council Leaders have been working positively, productively and intensively on the issues of devolution and public sector reform. Prior to suggestions the government was seeking proposals for devolution and local government reorganisation, Kent Council Leaders have been meeting bi-monthly and Kent Chief Executives have been meeting monthly. In recent months, both groups have been meeting weekly, and a special working group has been set up to focus and prioritise work in this area. We are also utilising our county-wide professional Council officer groups (e.g. HR Officers, Section 151 Officers etc) to assist with the evidence collection and to look for opportunities for greater alignment of working arrangements to support a smoother transition to the new unitary arrangements.

Our DPP submission was supported by all 14 principal Council Leaders, and we have been developing a set of overarching principles that govern how we work together including working collaboratively (and as equals) for the good of our communities and putting organisational boundaries and self-interest to one side. We have committed to sharing resources and expertise (recognising that we all have different capacity and skills to offer) and to try to do things once and together through a coordinated programme management and project structure. We have also committed to seek opportunities to align policies, systems, process and procurement activity to be open, transparent and fair to our collective workforces, to be open and honest with residents, partners and staff and to collaborate to maximise engagement with others.

Conclusion

We recognise the significant opportunity that devolution and local government reorganisation presents for Kent. As the 14 Council Leaders we have worked hard to prioritise unity in submitting a single Interim Plan whilst focusing on determining a collaborative way forward to develop more detailed proposals including a business case by the November 2025 deadline. As we continue working with partners and our residents, we look forward to engaging with the government to shape local government structures that truly serve our communities. The strong foundation of partnership we have built over the years gives us the confidence that we can develop an enduring framework that meets the needs of our residents and supports them for the future.

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Supplementary Submission from Kent councils on Local Government Reorganisation

Logos of those councils who have agreed to submit this document to be added.

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Section 1: Introduction

All Kent councils have submitted a single, agreed response to the Minister’s letter of 5 February 2025 committing to a unitary structure being implemented across Kent with effect from 1 April 2028 and responding to the criteria set out in the appendix to the Minister’s letter.

It has not been possible to agree the likely options for the size and boundaries of new councils along with indicative efficiency saving opportunities (criteria ‘B’ in the guidance for Interim Plans) across all 14 Kent authorities, but the authorities listed on the title page have agreed this supplementary submission which provides a range of data associated with four possible geographies, a high-level financial analysis and an assessment of each model against some principles agreed by Kent Council Leaders and the government’s assessment criteria for unitary local government.

The following submission comprises:

- A description and map of each possible unitary model
- A range of data for each model including: population (now and future projected), alignment to health and care partnerships and travel to work areas, spatial planning constraints and demographic information.
- A high-level financial analysis of the costs, benefits and implementation costs associated with a three or four unitary model together with an analysis of possible efficiencies associated with staffing, property, third party spend and democratic costs.
- An assessment of each model against principles agreed by Kent Council leaders and the government’s established assessment criteria for unitary local government.





This Supplementary Submission has been agreed by: (IF AGREED)

[Insert Leaders names here]

Section 2: Possible Options for Unitary Government in Kent

The above Council leaders have agreed to explore four possible models for unitary government in Kent as follows:

- Model 1: A three unitary model made up as follows: West (Sevenoaks, Tonbridge and Malling, Tunbridge Wells and Maidstone); North (Dartford, Gravesham, Medway and Swale); East (Canterbury, Thanet, Ashford, Dover, Folkestone & Hythe).
- Model 2: A four unitary model made up as follows: West (Sevenoaks, Tonbridge and Malling, Tunbridge Wells and Maidstone); North (Dartford, Gravesham, Medway); East (Canterbury, Swale, Thanet), South (Ashford, Dover, Folkestone & Hythe).
- Model 3: A four unitary model made up as follows: Mid (Ashford, Swale, Folkestone and Hythe); West (Sevenoaks, Tonbridge and Malling, Tunbridge Wells and Maidstone,); North (Dartford, Gravesham, Medway); East (Canterbury, Dover, Thanet)
- Model 4: a four unitary model comprising: **West**: (Tunbridge Wells, Tonbridge and Malling and Sevenoaks); **Mid** (Maidstone, Ashford and Swale); **North** (Dartford, Gravesham, Medway); **East** (Thanet, Dover, Folkestone and Hythe, Canterbury).

<p>Option 1 Three unitary authority North (Dartford, Gravesham, Medway, and Swale) East (Thanet, Dover, Canterbury, Folkestone & Hythe, Ashford) West (Maidstone, Tonbridge & Malling, Tunbridge Wells, Sevenoaks)</p>	
<p>Option 2 Four unitary model West (Sevenoaks, Tonbridge and Malling, Tunbridge Wells and Maidstone) North (Dartford, Gravesham, Medway) East (Canterbury, Swale, Thanet) South (Ashford, Dover, Folkestone & Hythe)</p>	
<p>Option 3 Four unitary model Mid (Ashford, Swale, Folkestone & Hythe) West (Sevenoaks, Tonbridge and Malling, Tunbridge Wells and Maidstone) North (Dartford, Gravesham, Medway) East (Canterbury, Dover, Thanet)</p>	
<p>Option 4 Four unitary model North (Dartford, Gravesham, Medway) East (Thanet, Canterbury, Dover, Folkestone & Hythe) Mid (Swale, Maidstone, Ashford) West (Sevenoaks, Tonbridge & Malling, Tunbridge Wells)</p>	

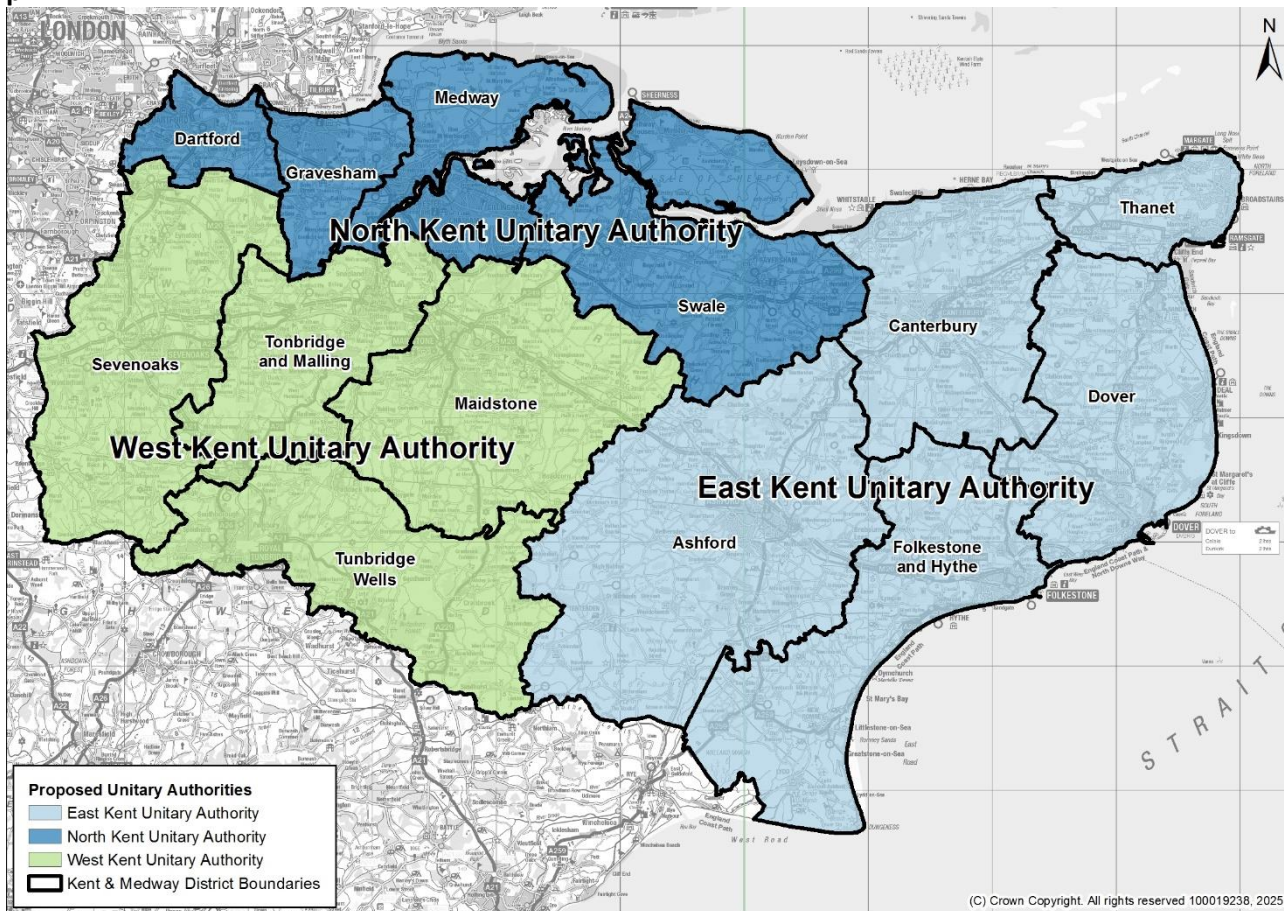
Not all leaders support all the models, and it may be that further models (or variants to the above) may be produced and assessed as part of future work and may feature in the final submission to government.

Section 3: Information on Possible Unitary Geographies

Section 3.1: Model 1 (Three Unitaries)

Model 1 (three unitaries):	<p>North (Dartford, Gravesham, Medway, Swale)</p> <p>East (Ashford, Canterbury, Dover, Folkestone and Hythe, Thanet)</p> <p>West (Maidstone, Sevenoaks, Tonbridge and Malling, Tunbridge Wells)</p>
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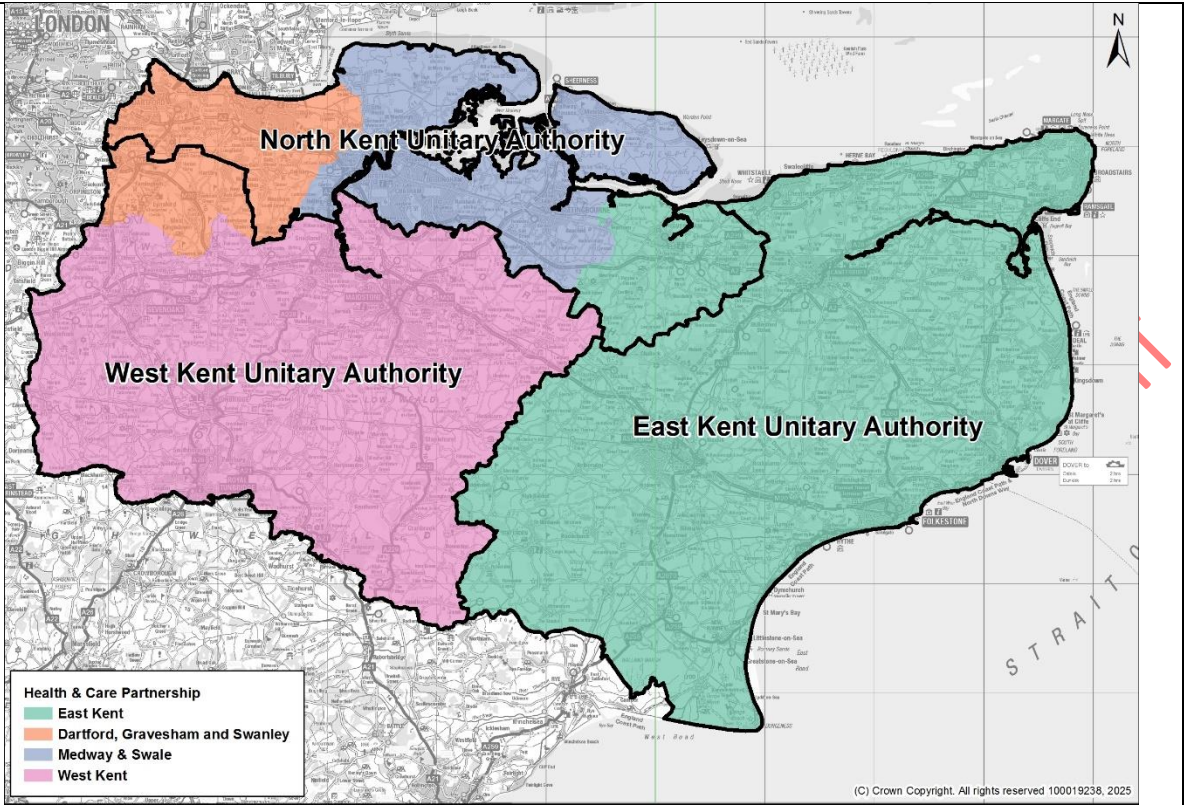
Map



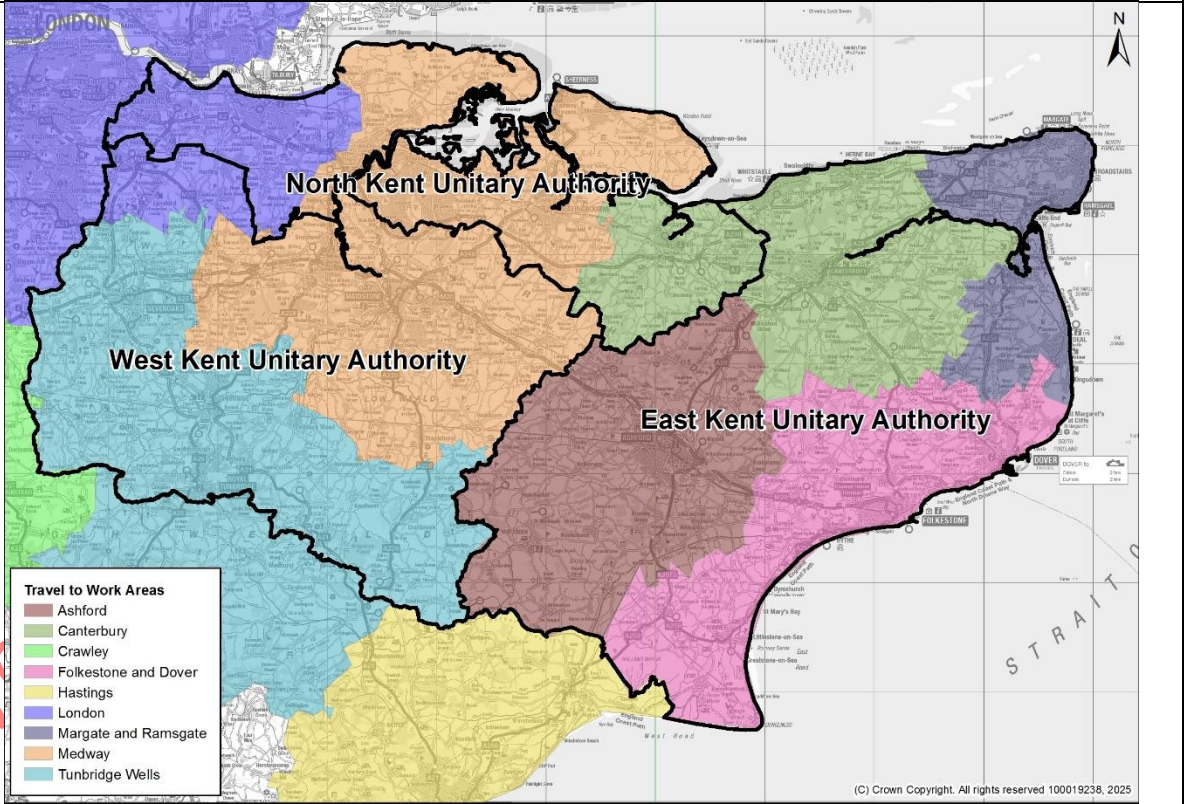
Population:	Potential Unitary	District	District population (mid-2022)	Unitary population (mid-2022)	Potential growth by 2035*
	North Kent		Dartford	118,820	663,111
		Gravesham	106,970		
		Medway	282,702		
		Swale	154,619		
East Kent		Ashford	135,610	661,559	53k to 103k
		Canterbury	157,550		
		Dover	117,473		
		Folkestone and Hythe	110,237		
West Kent		Thanet	140,689	551,223	39k to 72k
		Maidstone	180,428		
		Sevenoaks	121,106		
		Tonbridge and Malling	133,661		
		Tunbridge Wells	116,028		

*Two estimates based off the % growth between 2022 and 2035 for each district from: a) the ONS Sub-National Population Projections and b) the KCC Housing Led Forecast. Weighted by each district's contribution towards the UA's total population (2022 MYE).

NHS Health & Care Partnership alignment:

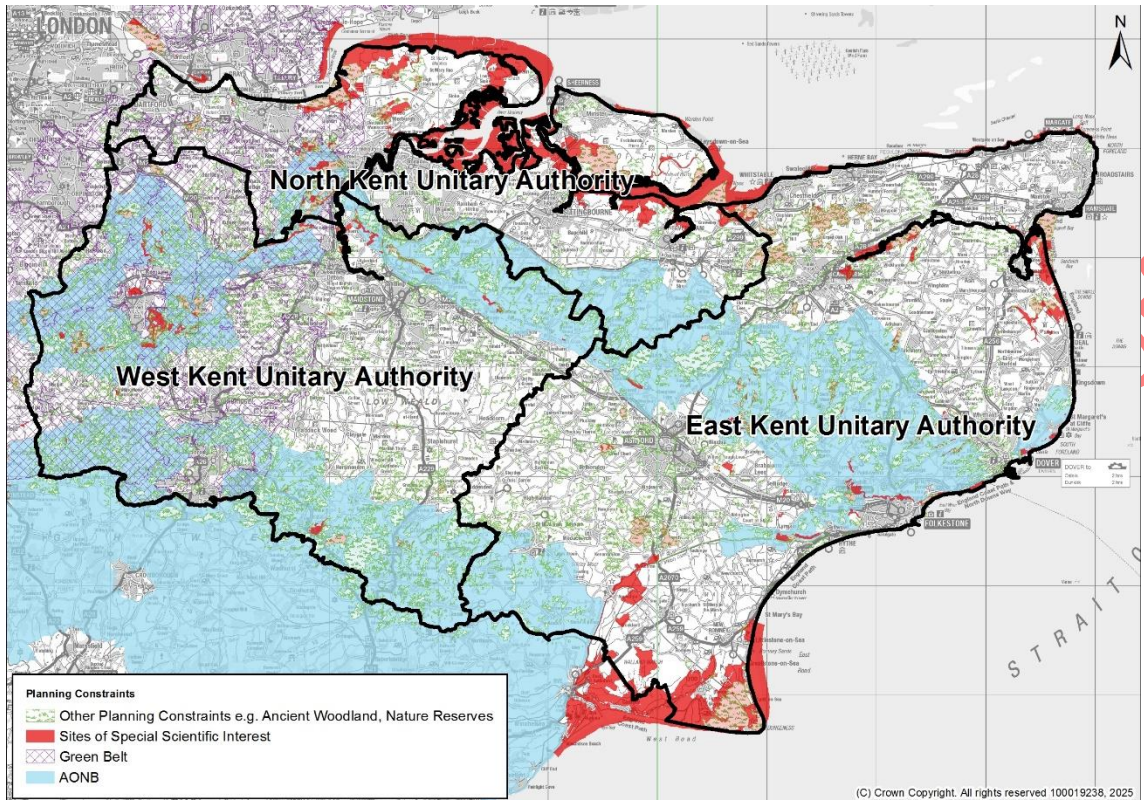


Travel to Work Areas:



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Spatial planning constraints:



Indicative Local Housing Need - annual (new standard method)

Potential Unitary	District	Indicative Local Housing Need (new method)		Estimated avg household size*
North Kent	Dartford	712	4,026	2.49
	Gravesham	672		
	Medway	1,594		
	Swale	1,048		
East Kent	Ashford	952	4,921	2.30
	Canterbury	1,216		
	Dover	746		
	Folkestone and Hythe	859		
	Thanet	1,148		
West Kent	Maidstone	1,358	4,700	2.42
	Sevenoaks	1,149		
	Tonbridge and Malling	1,096		
	Tunbridge Wells	1,098		

*Estimated by taking the average household size in each district (from Census 2021) and producing a weighted average based on the LHN.

Social and Demographic Information Drawn from Oxford Consultants for Social Inclusion

Population Composition

	West	North	East	Kent	England
Males	48.75%	49.09%	48.45%	48.72%	49.00%
Females	51.25%	50.91%	51.55%	51.28%	51.00%
Population Aged 0-15	19.81%	20.79%	17.49%	19.12%	18.50%
Population Aged 16 to 64	60.30%	62.44%	59.56%	60.43%	62.88%
Population Aged 65+	19.89%	16.77%	22.96%	20.45%	18.61%

IMD Score

Index of Multiple Deprivation 2019 (combining indicators under seven different domains of deprivation: Income Deprivation; Employment Deprivation; Education Skills and Training Deprivation; Health Deprivation and Disability; Crime; Barriers to Housing and Services and Living Environment Deprivation).

West	North	East	Kent	England
13.73	23.34	22.44	19.54	21.76

Unemployment

The proportion of working age people receiving benefits for unemployment.

	West	North	East	Kent	England
Unemployment benefit claimants (Jobseekers Allowance and out of work Universal Credit claimants)	2.66%	3.94%	3.98%	3.47%	4.22%
Youth unemployment (18-24 receiving JSA or Universal Credit)	4.34%	6.76%	6.06%	5.72%	5.46%
Older person unemployment (50+ receiving JSA or Universal Credit)	0.93%	1.44%	1.34%	1.20%	1.65%
Unemployment benefit (JSA and Universal Credit), female	2.51%	3.55%	3.36%	3.07%	3.75%
Unemployment benefit (JSA and Universal Credit), male	2.82%	4.35%	4.63%	3.89%	4.71%

Average House Price

Average property price for all dwelling types between Dec-2023 to Nov-2024

West	North	East	Kent	England
£375,814	£285,695	£263,733	£313,496	£313,307

Crime

Total recorded crimes and crimes per 1,000 people between Dec-2023 to Nov-2024.

	West	North	East	Kent	England
Total Crime	44,508	73,897	65,978	152,915	5,173,622
Rate	80.7	111.5	99.6	95.9	90.6

Health

Proportion of claimants of disability benefits from the DWP.

	West	North	East	Kent	England
Independence Payment (PIP)	6.81%	9.48%	11.25%	9.24%	9.20%
Disability benefit (DLA)	2.05%	2.67%	2.71%	2.51%	2.10%
Older people social care benefit (Attendance Allowance)	12.34%	13.69%	14.16%	13.43%	13.23%
Households on Universal Credit, Disabled Child Entitlement	1.66%	2.59%	2.50%	2.27%	1.82%

Households on Universal Credit - Limited Capability for Work Entitlement	4.28%	6.61%	11.25%	5.97%	6.14%
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Education

Level of Qualification of people aged 16+ from the 2021 Census.

	West	North	East	Kent	England
No Qualifications	15.72%	19.59%	18.77%	17.96%	18.08%
Apprenticeship	5.25%	6.02%	5.72%	5.61%	5.32%
Other	2.64%	3.01%	2.98%	2.88%	2.76%
Level 1	10.06%	11.93%	10.81%	10.79%	9.69%
Level 2	15.08%	15.60%	14.40%	14.86%	13.32%
Level 3	16.68%	17.34%	18.31%	17.42%	16.92%
Level 4/5	34.57%	26.51%	29.01%	30.49%	33.92%

Councillor/Electorate numbers

Proposed Unitary Option	District area	Electorate	Total	Per 30 Cllrs	Per 60 Cllrs	Per 100 Cllrs
East Kent	Ashford	95,087	464,222	15,474	7,737	4,642
	Dover	87,238				
	Folkestone and Hythe	70,194				
	Canterbury	108,317				
	Thanet	103,386				
West Kent	Sevenoaks	90,283	407,167	13,572	6,786	4,071
	Tonbridge and Malling	100,052				
	Tunbridge Wells	85,162				
	Maidstone	131,670				
North Kent	Dartford	84,833	477,468	15,915	7,957	4,774
	Gravesham	76,516				
	Medway	206,075				
	Swale	110,044				
		1,348,857				

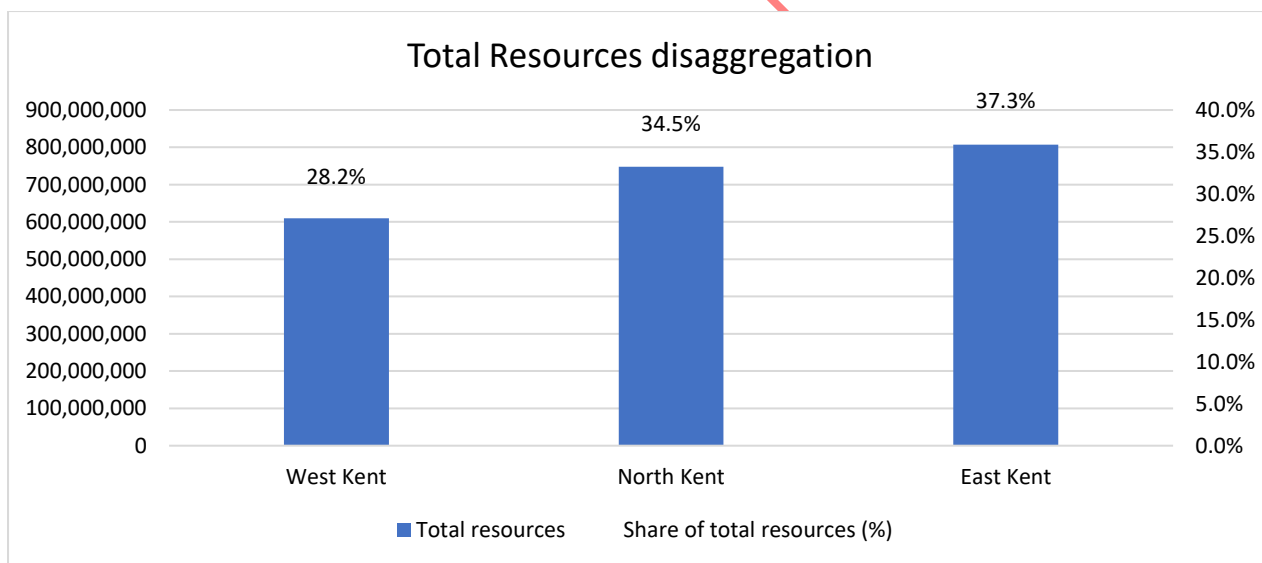
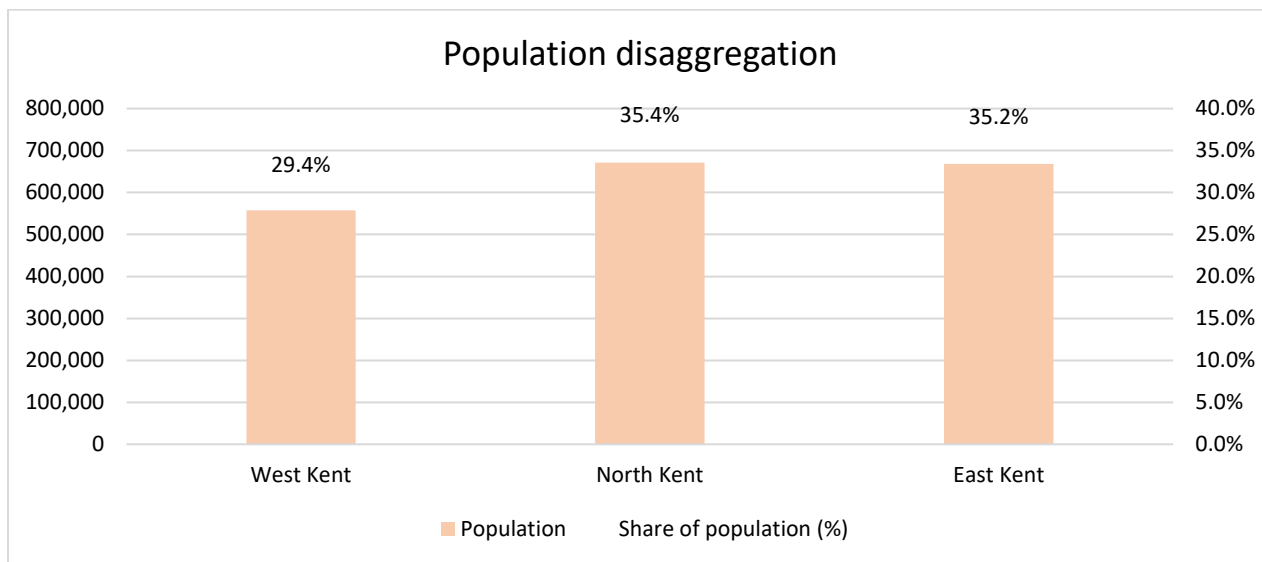
Councillor/Population numbers

Proposed Unitary Option	District area	Population	Total	Per 30 Cllrs	Per 60 Cllrs	Per 100 Cllrs
East Kent	Ashford	138,283	668,247	22,274.9	11,137.45	6,682.47
	Dover	118,591				
	Folkestone and Hythe	110,995				
	Canterbury	159,939				
	Thanet	140,439				
West Kent	Sevenoaks	121,262	557,675	18,589.16	9,294.58	5,576.75
	Tonbridge and Malling	135,206				
	Tunbridge Wells	117,020				
	Maidstone	184,187				
North Kent	Dartford	120,699	671,129	22,370.96	11,185.48	6,711.29
	Gravesham	107,737				

	Medway	286,800				
	Swale	155,893				
		1,897,051				

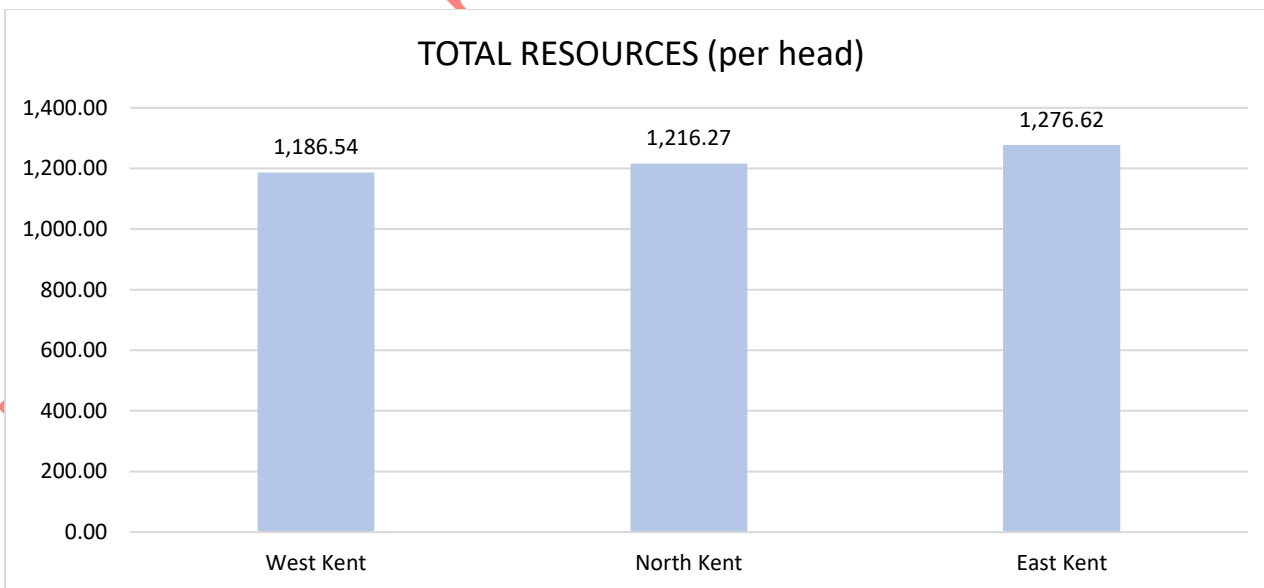
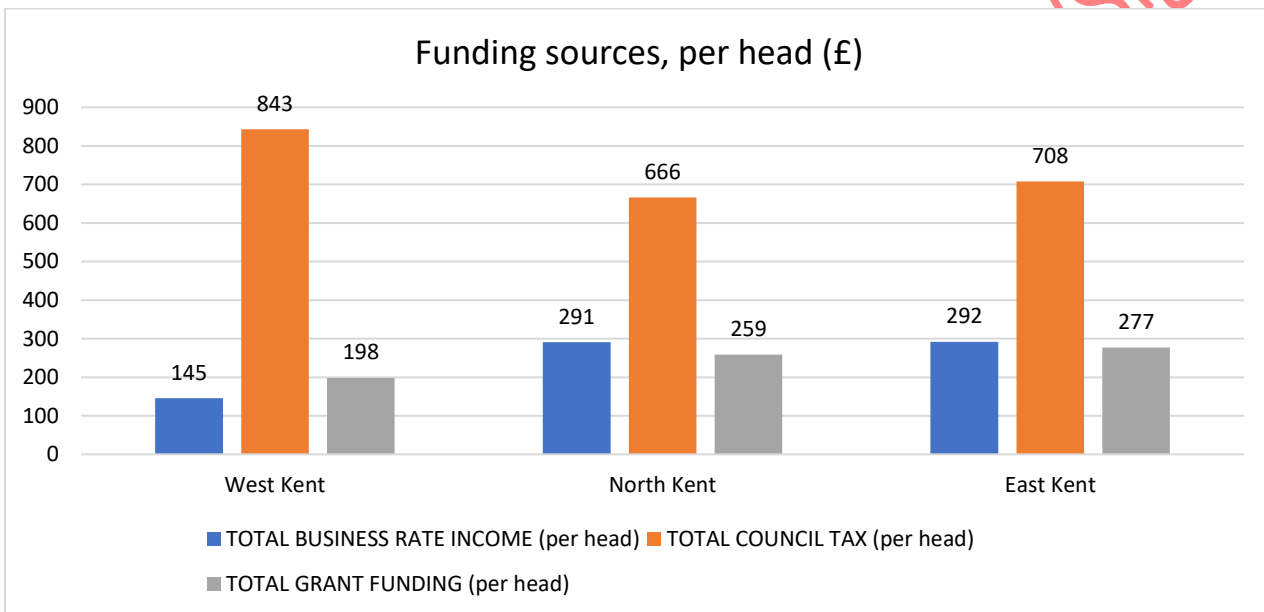
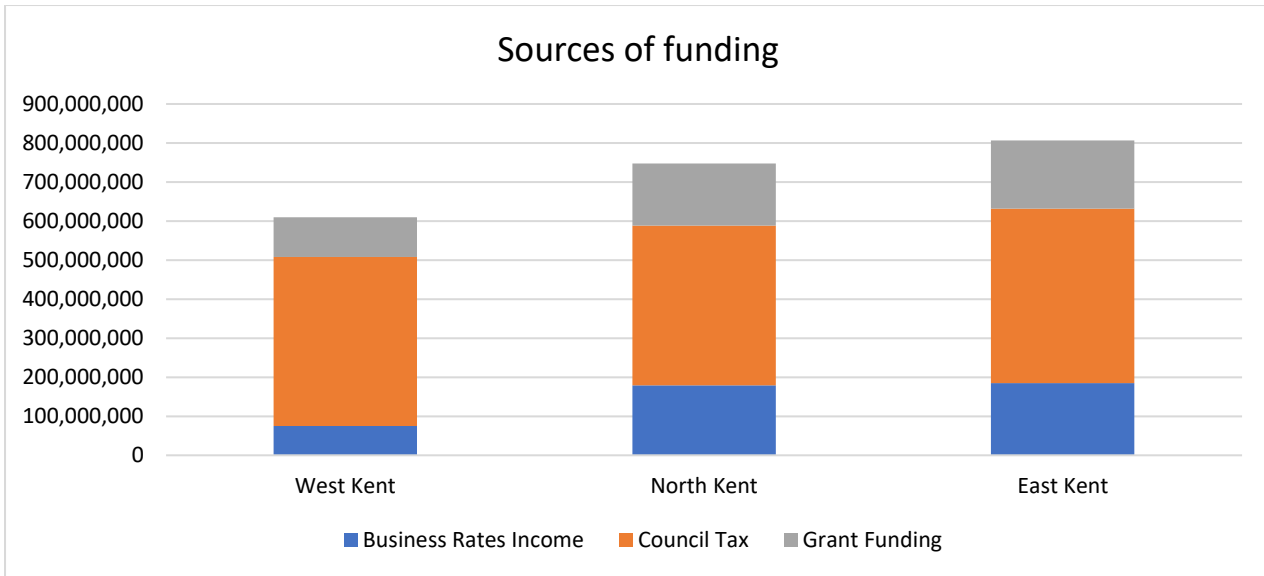
Funding Disaggregation Model

Information on major funding streams received by cluster (including Council Tax, grant funding and Business Rates Retention) using a model from Pixel which uses data from publicly available sources and Council returns to government.



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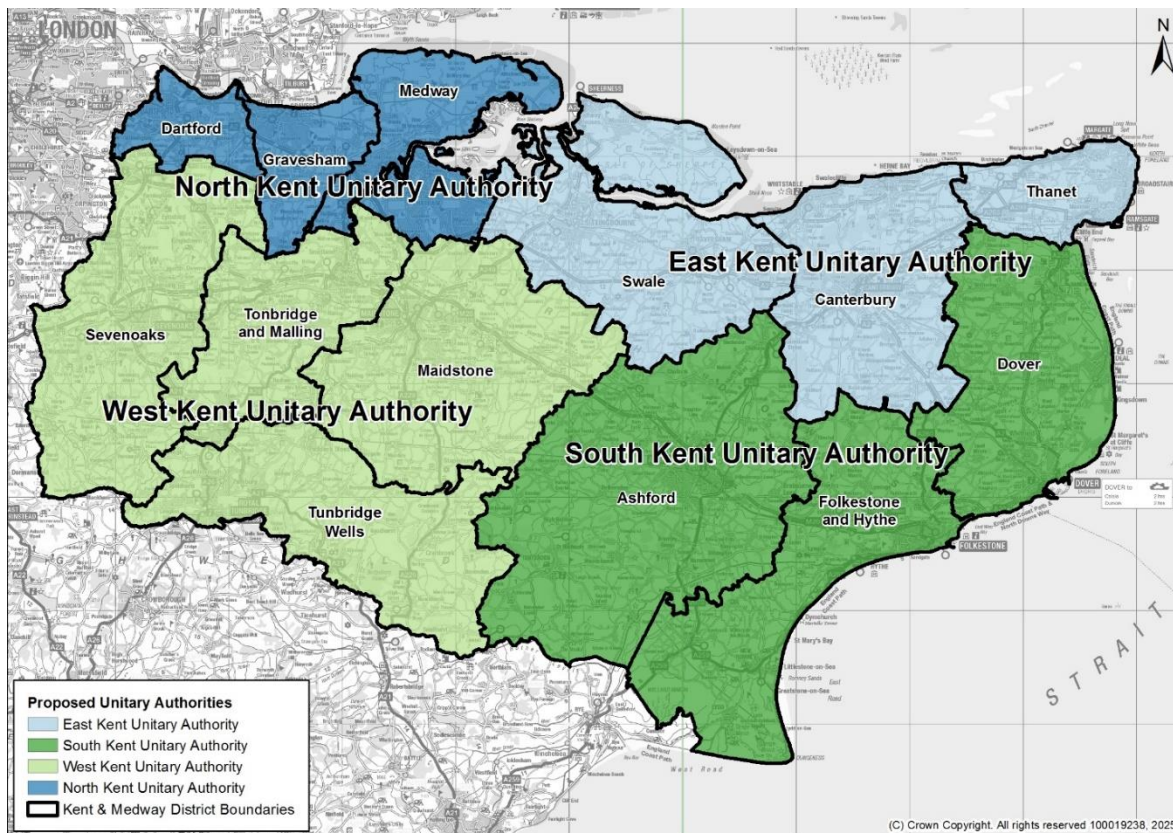
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Section 3.2: Model 2 (Four Unitaries NSEW)

Model 2 (four unitaries, NESW):	<p>North (Dartford, Gravesham, Medway)</p> <p>East (Canterbury, Swale, Thanet)</p> <p>South (Ashford, Dover, Folkestone and Hythe)</p> <p>West (Maidstone, Sevenoaks, Tonbridge and Malling, Tunbridge Wells)</p>
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Map

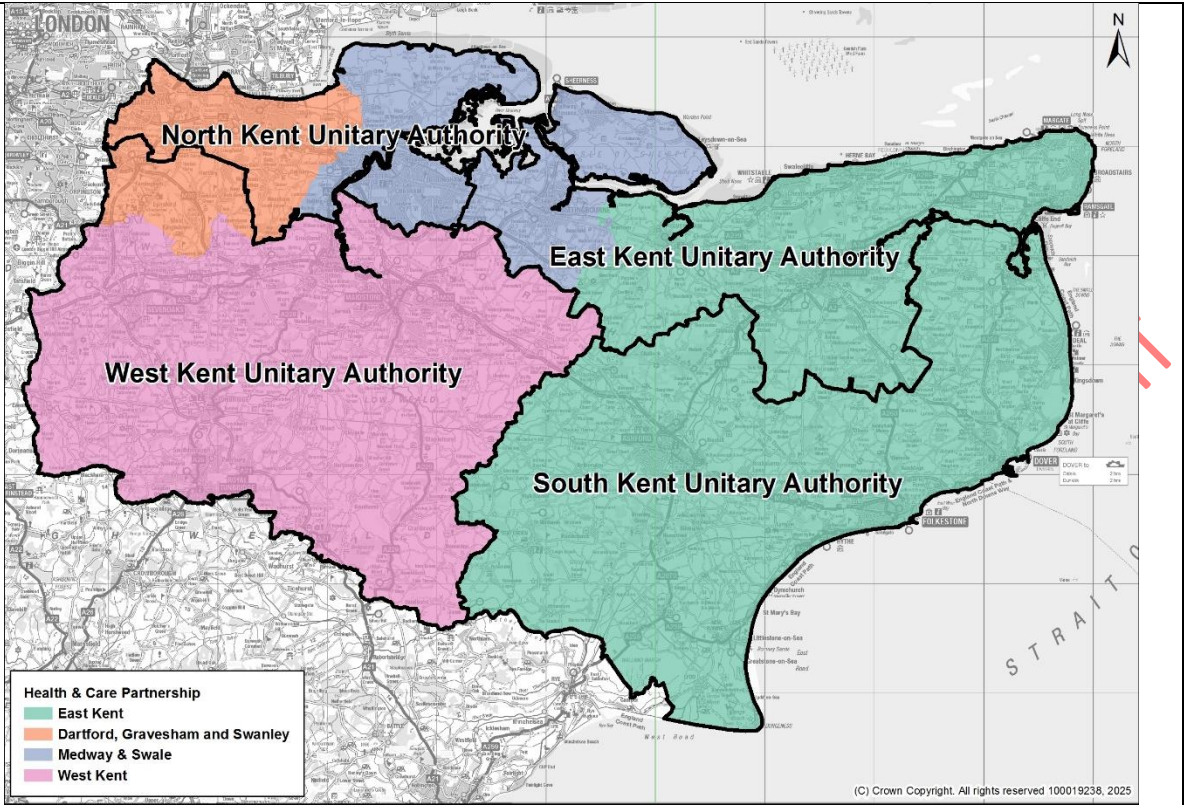


Population:

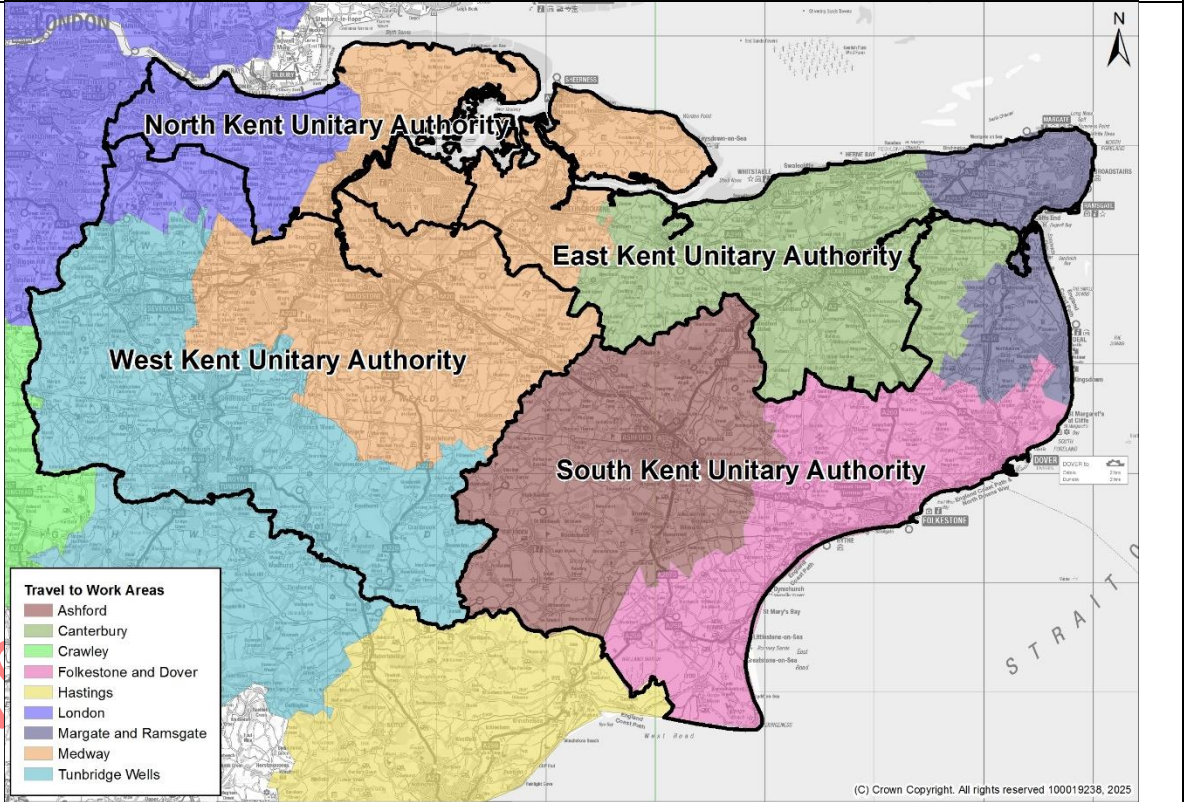
Potential Unitary	District	District population (mid-2022)	Unitary population (mid-2022)	Potential growth by 2035*
North Kent	Dartford	118,820	508,492	26k to 77k
	Gravesham	106,970		
	Medway	282,702		
East Kent	Canterbury	157,550	452,858	32k to 69k
	Swale	154,619		
	Thanet	140,689		
South Kent	Ashford	135,610	363,320	35k to 53k
	Dover	117,473		
	Folkestone and Hythe	110,237		
West Kent	Maidstone	180,428	551,223	39k to 72k
	Sevenoaks	121,106		
	Tonbridge and Malling	133,661		
	Tunbridge Wells	116,028		

*Two estimates based off the % growth between 2022 and 2035 for each district from: a) the ONS Sub-National Population Projections and b) the KCC Housing Led Forecast. Weighted by each district's contribution towards the UA's total population (2022 MYE).

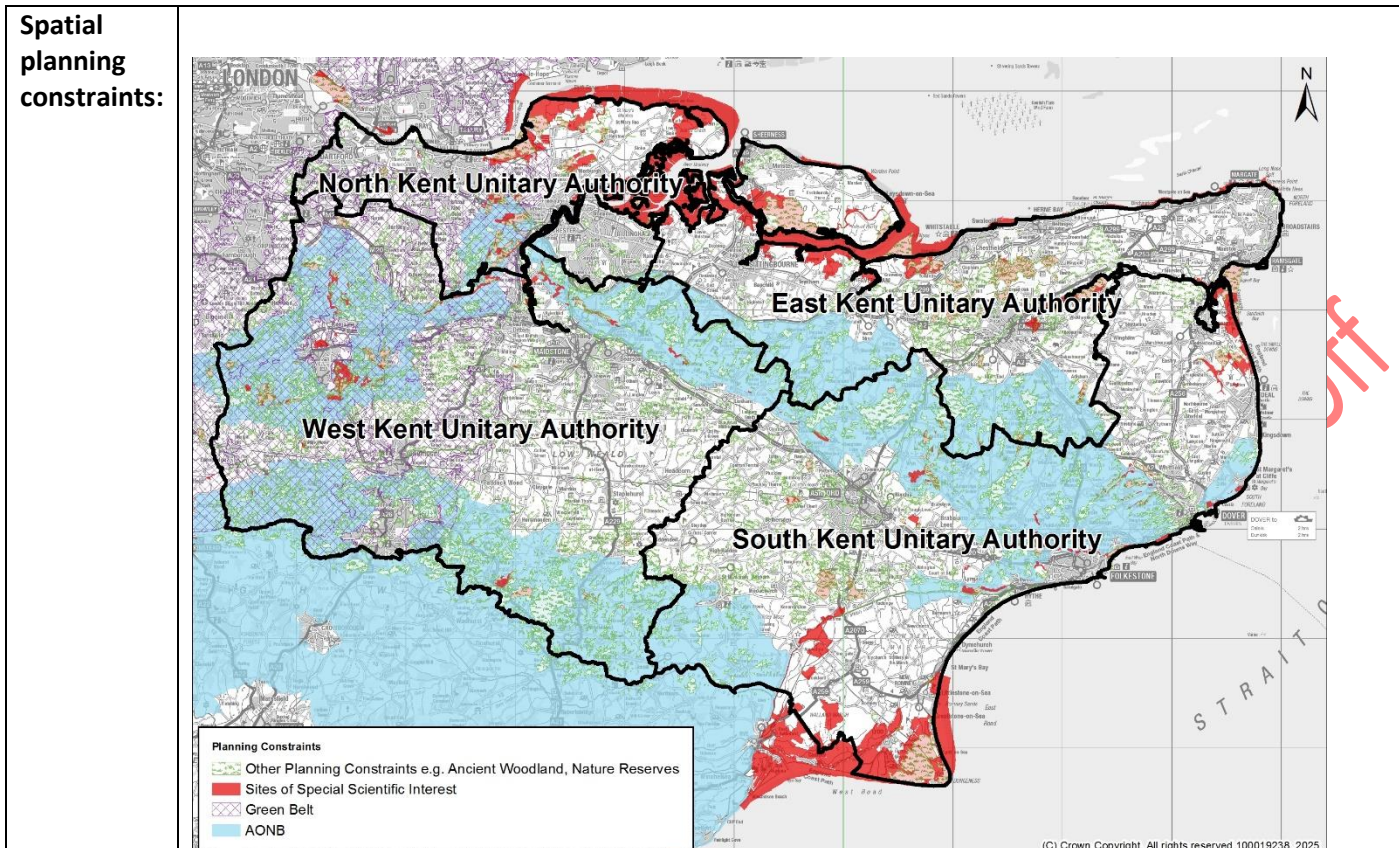
NHS Health & Care Partnership alignment:



Travel to Work Areas:



Draft V2



Indicative Local Housing Need - annual (new standard method)	Potential Unitary		Indicative Local Housing Need (new method)	Estimated avg household size*	
	District	District			
North Kent	Dartford		712	2,978	2.51
	Gravesham		672		
	Medway		1,594		
East Kent	Canterbury		1,216	3,412	2.33
	Swale		1,048		
	Thanet		1,148		
South Kent	Ashford		952	2,557	2.33
	Dover		746		
	Folkestone and Hythe		859		
West Kent	Maidstone		1,358	4,700	2.42
	Sevenoaks		1,149		
	Tonbridge and Malling		1,096		
	Tunbridge Wells		1,098		

*Estimated by taking the average household size in each district (from Census 2021) and producing a weighted average based on the LHN.

Social and Demographic Information Drawn from Oxford Consultants for Social Inclusion

Population Composition

	West	North	East	South	Kent	England
Males	48.75%	48.92%	48.65%	48.71%	48.72%	49.00%
Females	51.25%	51.08%	51.35%	51.29%	51.28%	51.00%
Population Aged 0-15	19.81%	21.14%	17.81%	18.00%	19.12%	18.50%
Population Aged 16 to 64	60.30%	62.79%	60.52%	59.08%	60.43%	62.88%
Population Aged 65+	19.89%	16.07%	21.67%	22.92%	20.45%	18.61%

IMD Score

Index of Multiple Deprivation 2019 (combining indicators under seven different domains of deprivation: Income Deprivation; Employment Deprivation; Education Skills and Training Deprivation; Health Deprivation and Disability; Crime; Barriers to Housing and Services and Living Environment Deprivation).

West	North	East	South	Kent	England
13.73	22.21	24.80	21.43	19.54	21.76

Unemployment

The proportion of working age people receiving benefits for unemployment.

	West	North	East	South	Kent	England
Unemployment benefit claimants (Jobseekers Allowance and out of work Universal Credit claimants)	2.66%	4.03%	4.15%	3.63%	3.47%	4.22%
Youth unemployment (18-24 receiving JSA or Universal Credit)	4.34%	6.71%	5.87%	6.79%	5.72%	5.46%
Older person unemployment (50+ receiving JSA or Universal Credit)	0.93%	1.51%	1.42%	1.21%	1.20%	1.65%
Unemployment benefit (JSA and Universal Credit), female	2.51%	3.67%	3.46%	3.15%	3.07%	3.75%
Unemployment benefit (JSA and Universal Credit), male	2.82%	4.40%	4.87%	4.12%	3.89%	4.71%

Average House Price

Average property price for all dwelling types between Dec-2023 to Nov-2024

West	North	East	South	Kent	England
£375,814	£287,693	£263,733	£288,232	£313,496	£313,307

Crime

Total recorded crimes and crimes per 1,000 people between Dec-2023 to Nov-2024.

	West	North	East	South	Kent	England
Total Crime	44,508	57,388	49,644	32,843	152,915	5,173,622
Rate	80.7	112.9	109.5	90.3	95.9	90.6

Health

Proportion of claimants of disability benefits from the DWP.

	West	North	East	South	Kent	England
Independence Payment (PIP)	6.81%	8.91%	11.58%	10.90%	9.24%	9.20%
Disability benefit (DLA)	2.05%	2.49%	2.92%	2.70%	2.51%	2.10%
Older people social care benefit (Attendance Allowance)	12.34%	13.71%	14.11%	14.02%	13.43%	13.23%
Households on Universal Credit, Disabled Child Entitlement	1.66%	2.37%	2.91%	2.32%	2.27%	1.82%
Households on Universal Credit - Limited Capability for Work Entitlement	4.28%	6.27%	7.68%	6.63%	5.97%	6.14%

Education

Level of Qualification of people aged 16+ from the 2021 Census.

	West	North	East	South	Kent	England
No Qualifications	15.72%	18.86%	19.82%	18.78%	17.96%	18.08%
Apprenticeship	5.25%	5.94%	5.75%	5.92%	5.61%	5.32%
Other	2.64%	3.04%	2.92%	3.03%	2.88%	2.76%
Level 1	10.06%	11.81%	10.86%	11.37%	10.79%	9.69%
Level 2	15.08%	15.61%	14.11%	15.25%	14.86%	13.32%
Level 3	16.68%	17.38%	18.68%	17.40%	17.42%	16.92%
Level 4/5	34.57%	27.37%	27.87%	28.24%	30.49%	33.92%

Councillor/Electorate numbers:

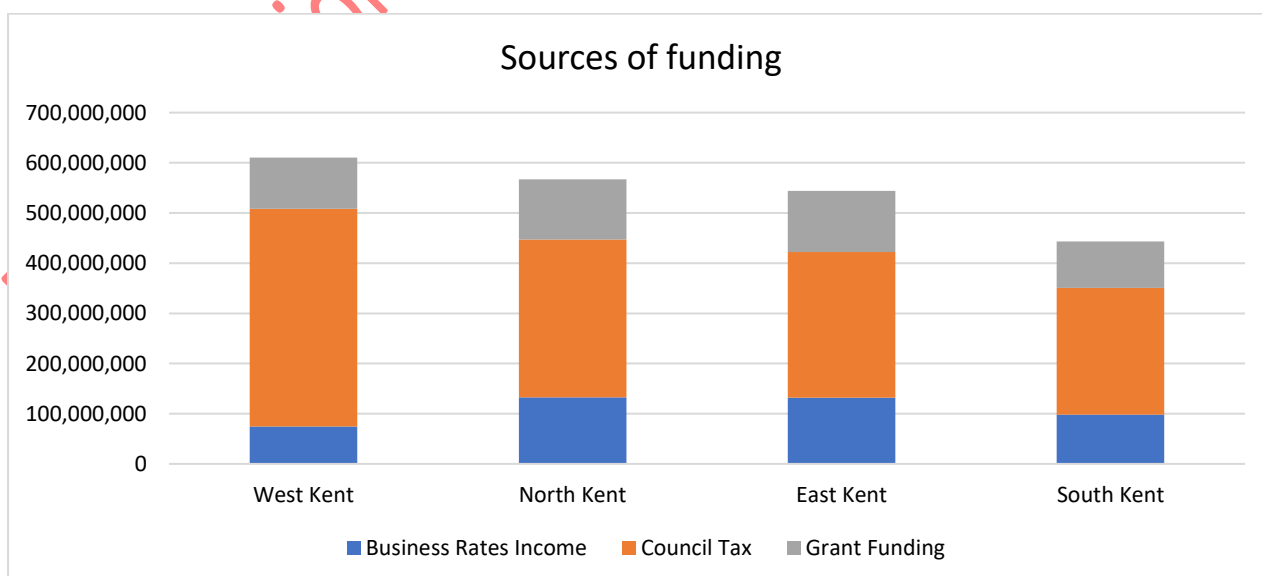
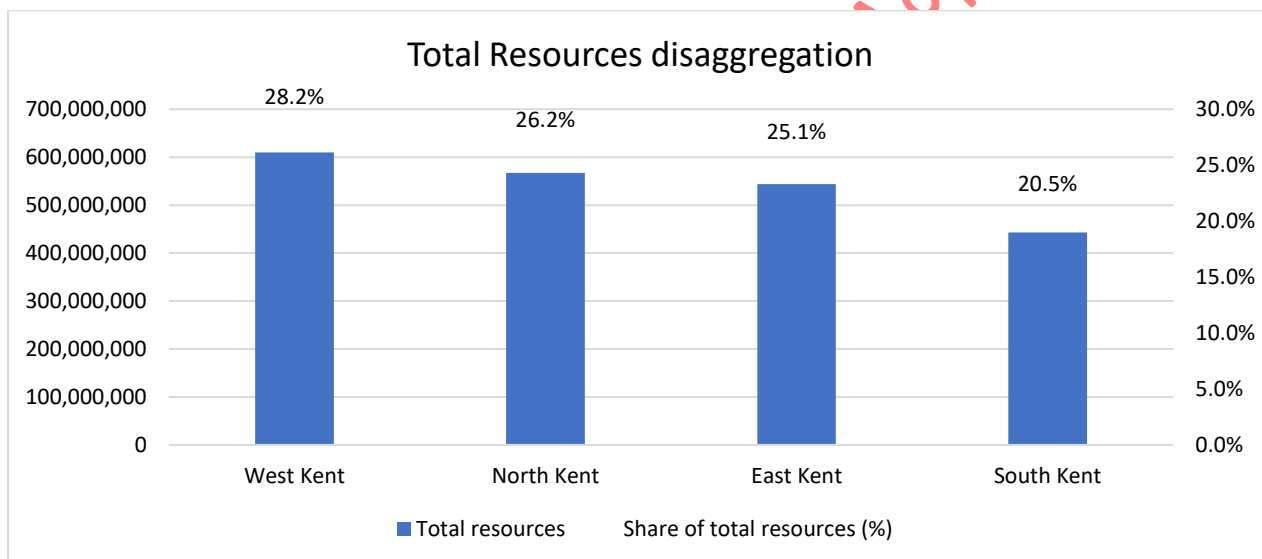
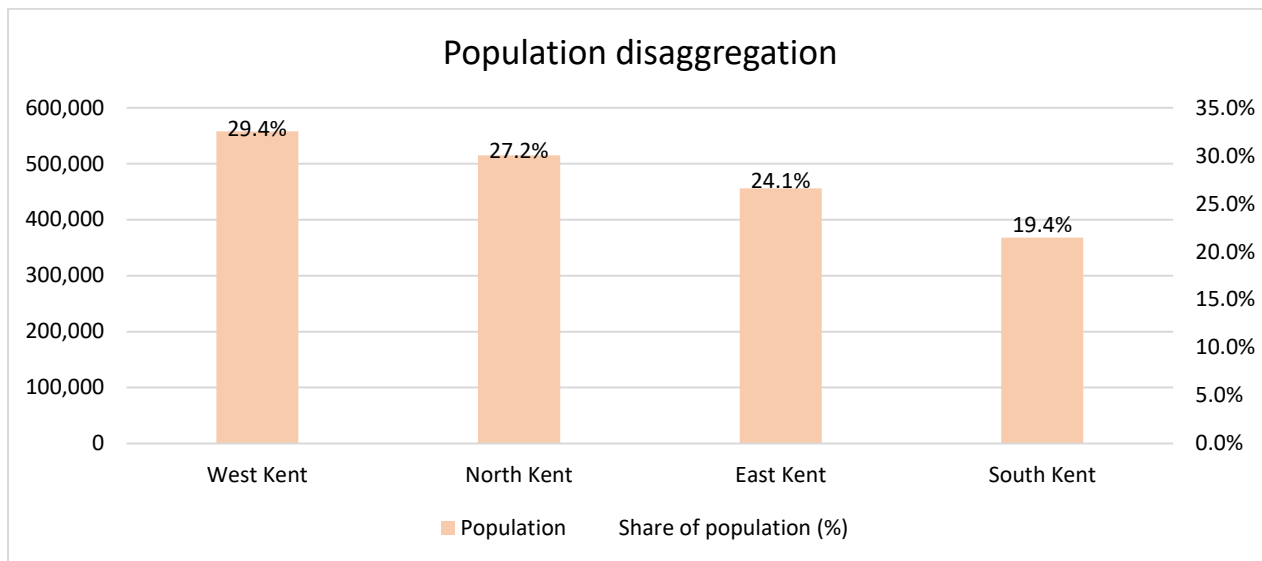
Proposed Unitary Option	District area	Electorate	Total	Per 30 Cllrs	Per 60 Cllrs	Per 100 Cllrs
West Kent	Sevenoaks	90,283	407,167	13,572	6,786	4,071
	Tonbridge and Malling	100,052				
	Tunbridge Wells	85,162				
	Maidstone	131,670				
North Kent	Dartford	84,833	367,424	12,247	6,123	3,674
	Gravesham	76,516				
	Medway	206,075				
East Kent	Canterbury	108,317	321,747	10,724	5,362	3,217
	Swale	110,044				
	Thanet	103,386				
South Kent	Ashford	95,087	252,519	8,417	4,208	2,525
	Dover	87,238				
	Folkestone and Hythe	70,194				
		1,348,857				

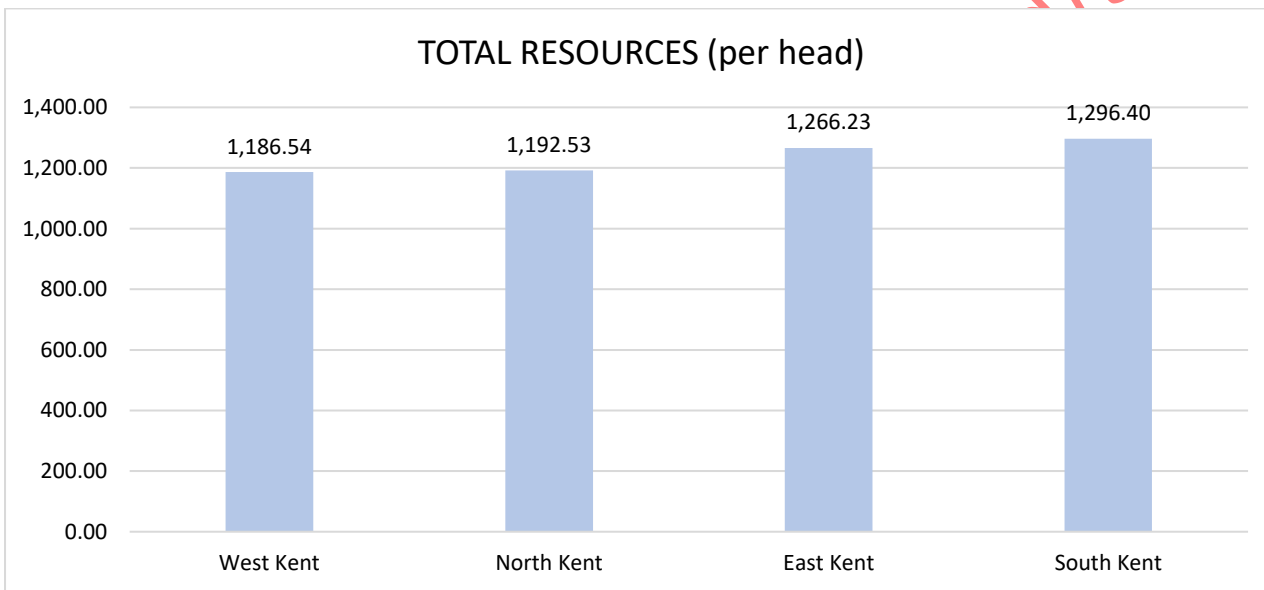
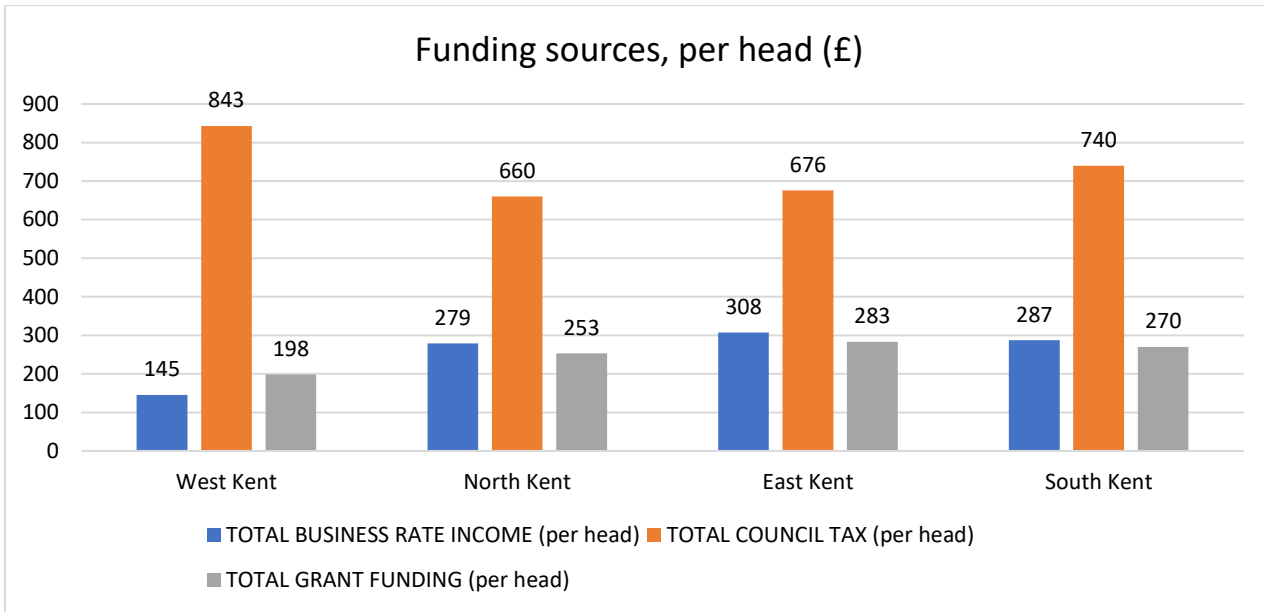
Councillor/population numbers:

Proposed Unitary Option	District area	Population	Total	Per 30 Cllrs	Per 60 Cllrs	Per 100 Cllrs
West Kent	Sevenoaks	121,262	557,675	18,589.16	9,294.58	5,576.75
	Tonbridge and Malling	135,206				
	Tunbridge Wells	117,020				
	Maidstone	184,187				
North Kent	Dartford	120,699	515,236	17,174.53	8,587.26	5,152.36
	Gravesham	107,737				
	Medway	286,800				
East Kent	Canterbury	159,939	456,271	15,209.03	7,604.51	4,562.71
	Swale	155,893				
	Thanet	140,439				
South Kent	Ashford	138,283	367,869	12,262.3	6,131.15	3,678.69
	Dover	118,591				
	Folkestone and Hythe	110,995				
		1,897,051				

Funding Disaggregation Model

Information on major funding streams received by cluster (including Council Tax, grant funding and Business Rates Retention) using a model from Pixel which uses data from publicly available sources and Council returns to government.





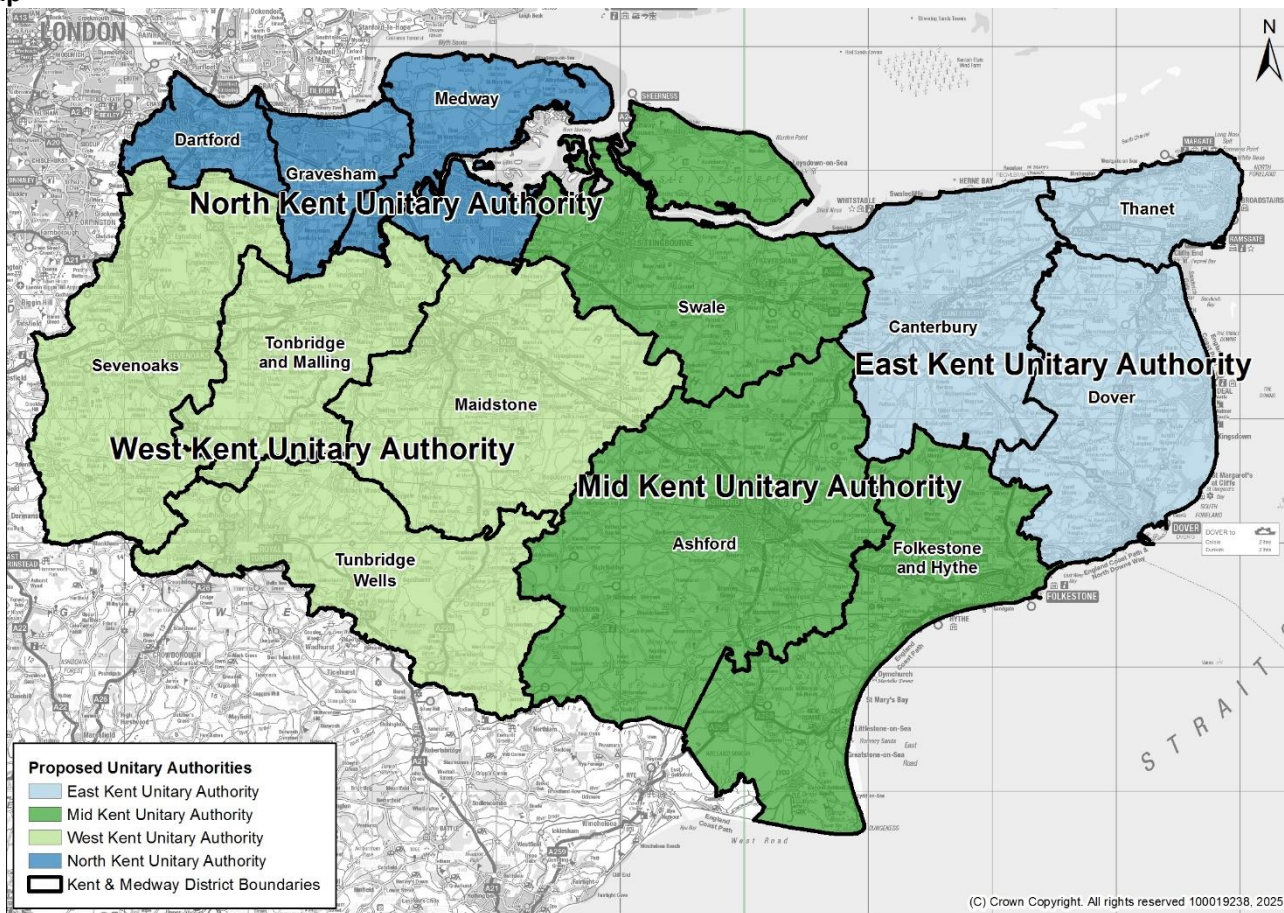
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Section 3.3: Model 3 (Four Unitaries NEMidW)

Model 3 (four unitaries, NEMidW):	<p>North (Dartford, Gravesham, Medway)</p> <p>East (Canterbury, Dover, Thanet)</p> <p>Mid (Ashford, Folkestone and Hythe, Swale)</p> <p>West (Maidstone, Sevenoaks, Tonbridge and Malling, Tunbridge Wells)</p>
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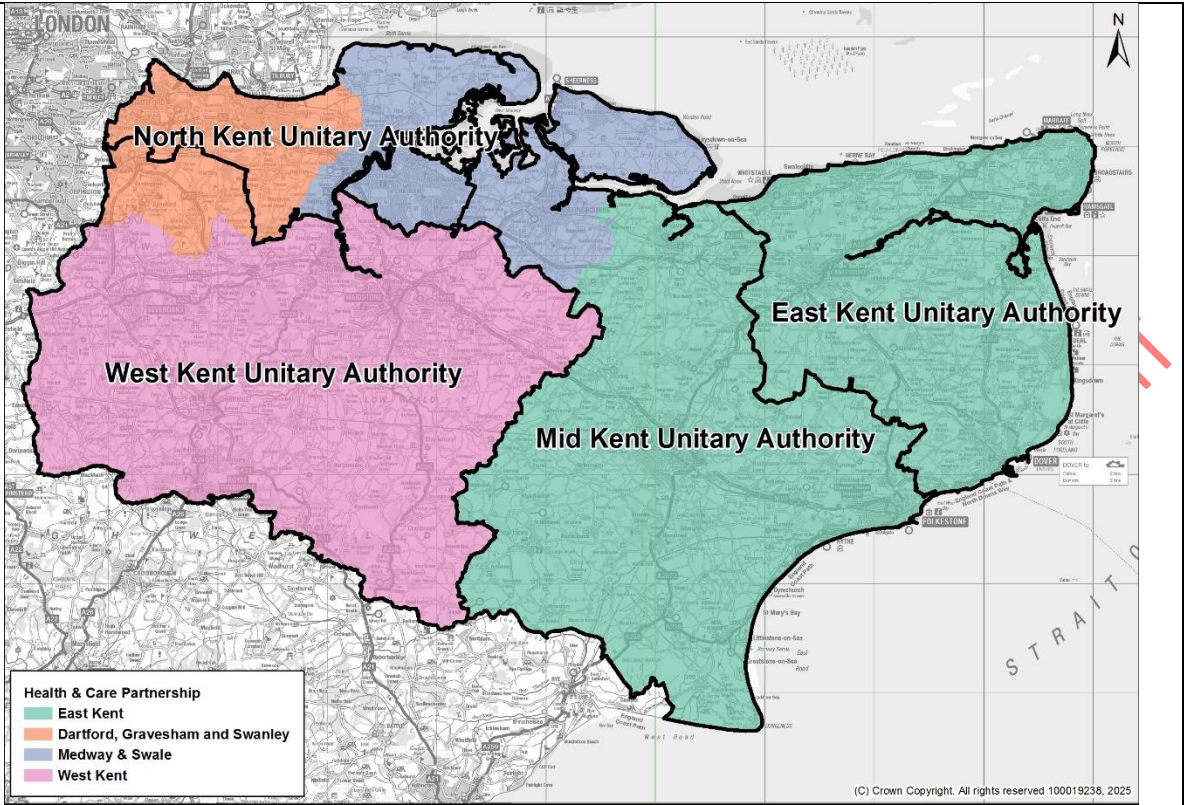
Map



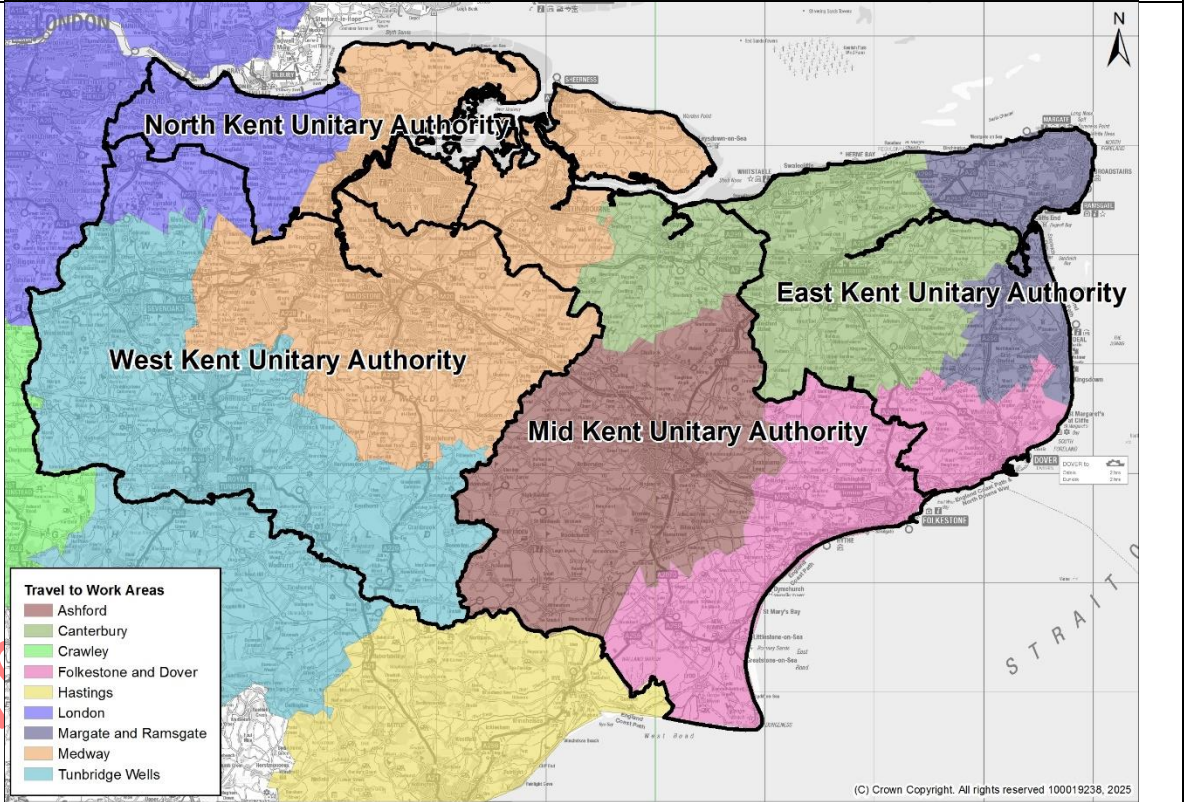
Population:	Potential Unitary	District	District population (mid-2022)	Unitary population (mid-2022)	Potential growth by 2035*
North Kent		Dartford	118,820	508,492	26k to 77k
		Gravesham	106,970		
		Medway	282,702		
East Kent		Canterbury	157,550	415,712	30k to 61k
		Dover	117,473		
		Thanet	140,689		
Mid Kent		Ashford	135,610	400,466	38k to 60k
		Folkestone and Hythe	110,237		
		Swale	154,619		
West Kent		Maidstone	180,428	551,223	39k to 72k
		Sevenoaks	121,106		
		Tonbridge and Malling	133,661		
		Tunbridge Wells	116,028		

*Two estimates based off the % growth between 2022 and 2035 for each district from: a) the ONS Sub-National Population Projections and b) the KCC Housing Led Forecast. Weighted by each district's contribution towards the UA's total population (2022 MYE).

NHS Health & Care Partnership alignment:

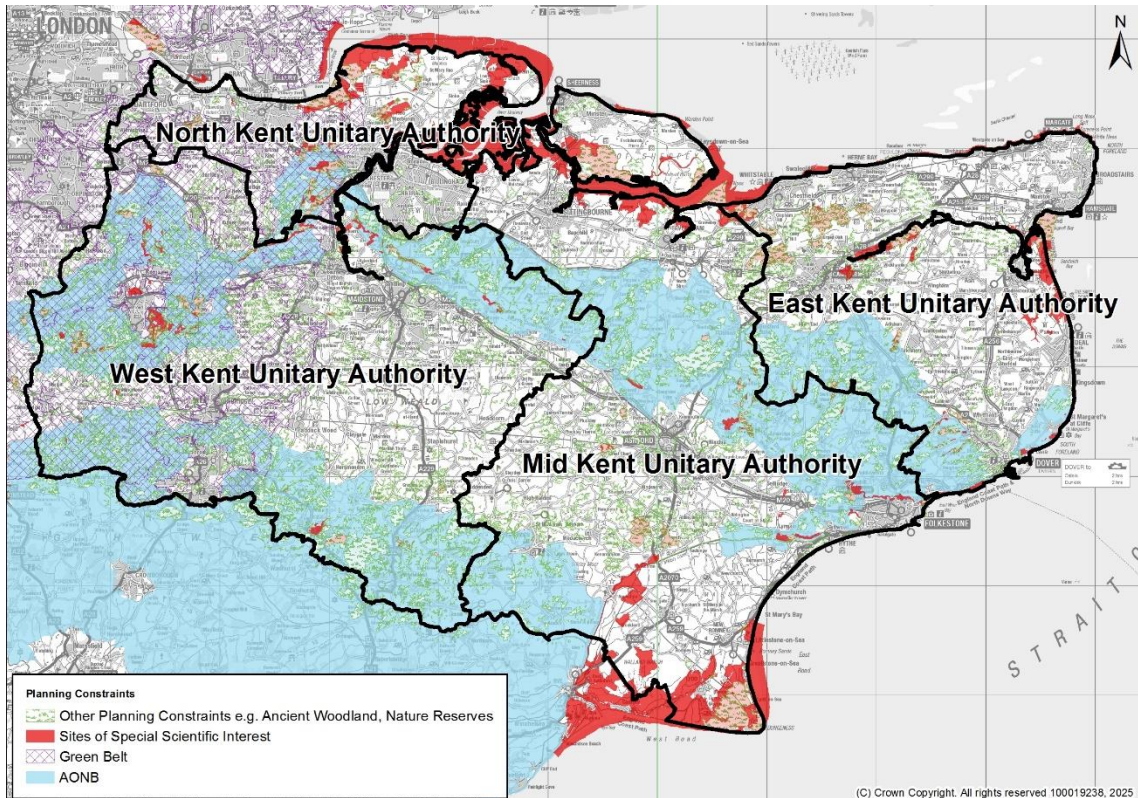


Travel to Work Areas:



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Spatial planning constraints:



Indicative Local Housing Need - annual (new standard method)

Potential Unitary	District	Indicative Local Housing Need (new method)	Estimated avg household size*
North Kent	Dartford	712	2,978
	Gravesham	672	
	Medway	1,594	
East Kent	Canterbury	1,216	3,110
	Dover	746	
	Thanet	1,148	
Mid Kent	Ashford	952	2,859
	Folkestone and Hythe	859	
	Swale	1,048	
West Kent	Maidstone	1,358	4,700
	Sevenoaks	1,149	
	Tonbridge and Malling	1,096	
	Tunbridge Wells	1,098	

*Estimated by taking the average household size in each district (from Census 2021) and producing a weighted average based on the LHN.

Social and Demographic Information Drawn from Oxford Consultants for Social Inclusion

Population Composition

	West	North	Mid	East	Kent	England
Males	48.75%	48.92%	49.06%	48.30%	48.72%	49.00%
Females	51.25%	51.08%	50.94%	51.70%	51.28%	51.00%
Population Aged 0-15	19.81%	21.14%	18.79%	17.03%	19.12%	18.50%
Population Aged 16 to 64	60.30%	62.79%	60.17%	59.60%	60.43%	62.88%
Population Aged 65+	19.89%	16.07%	21.04%	23.37%	20.45%	18.61%

IMD Score

Index of Multiple Deprivation 2019 (combining indicators under seven different domains of deprivation: Income Deprivation; Employment Deprivation; Education Skills and Training Deprivation; Health Deprivation and Disability; Crime; Barriers to Housing and Services and Living Environment Deprivation).

West	North	Mid	East	Kent	England
13.73	22.21	23.39	23.23	19.54	21.76

Unemployment

The proportion of working age people receiving benefits for unemployment.

	West	North	Mid	East	Kent	England
Unemployment benefit claimants (Jobseekers Allowance and out of work Universal Credit claimants)	2.66%	4.03%	3.64%	4.19%	3.47%	4.22%
Youth unemployment (18-24 receiving JSA or Universal Credit)	4.34%	6.71%	6.67%	5.87%	5.72%	5.46%
Older person unemployment (50+ receiving JSA or Universal Credit)	0.93%	1.51%	1.25%	1.39%	1.20%	1.65%
Unemployment benefit (JSA and Universal Credit), female	2.51%	3.67%	3.18%	3.46%	3.07%	3.75%
Unemployment benefit (JSA and Universal Credit), male	2.82%	4.40%	4.11%	4.96%	3.89%	4.71%

Average House Price

Average property price for all dwelling types between Dec-2023 to Nov-2024

West	North	Mid	East	Kent	England
£375,814	£287,693	£282,481	£267,711	£313,496	£313,307

Crime

Total recorded crimes and crimes per 1,000 people between Dec-2023 to Nov-2024.

	West	North	Mid	East	Kent	England
Total Crime	44,508	57,388	37,862	44,625	152,915	5,173,622
Rate	80.7	112.9	94.5	107.1	95.9	90.6

Health

Proportion of claimants of disability benefits from the DWP.

	West	North	Mid	East	Kent	England
Independence Payment (PIP)	6.81%	8.91%	10.70%	11.84%	9.24%	9.20%
Disability benefit (DLA)	2.05%	2.49%	2.91%	2.73%	2.51%	2.10%
Older people social care benefit (Attendance Allowance)	12.34%	13.71%	14.02%	14.11%	13.43%	13.23%
Households on Universal Credit, Disabled Child Entitlement	1.66%	2.37%	2.60%	2.68%	2.27%	1.82%
Households on Universal Credit - Limited Capability for Work Entitlement	4.28%	6.27%	6.80%	7.58%	5.97%	6.14%

Education

Level of Qualification of people aged 16+ from the 2021 Census.

	West	North	Mid	East	Kent	England
No Qualifications	15.72%	18.86%	19.80%	18.95%	17.96%	18.08%
Apprenticeship	5.25%	5.94%	6.06%	5.60%	5.61%	5.32%
Other	2.64%	3.04%	2.99%	2.95%	2.88%	2.76%
Level 1	10.06%	11.81%	11.79%	10.43%	10.79%	9.69%
Level 2	15.08%	15.61%	15.29%	13.98%	14.86%	13.32%
Level 3	16.68%	17.38%	17.19%	18.98%	17.42%	16.92%
Level 4/5	34.57%	27.37%	26.89%	29.11%	30.49%	33.92%

Councillor/Electorate numbers:

Proposed Unitary Option	District area	Electorate	Total	Per 30 Cllrs	Per 60 Cllrs	Per 100 Cllrs
Mid Kent	Ashford	95,087	275,325	9,177	4,588	2,753
	Swale	110,044				
	Folkestone and Hythe	70,194				
West Kent	Sevenoaks	90,283	407,167	13,572	6,786	4,071
	Tonbridge and Malling	100,052				
	Tunbridge Wells	85,162				
	Maidstone	131,670				
North Kent	Dartford	84,833	367,424	12,247	6,123	3,674
	Gravesham	76,516				
	Medway	206,075				
East Kent	Canterbury	108,317	298,941	9,964	4,982	2,989
	Dover	87,238				
	Thanet	103,386				
		1,348,857				

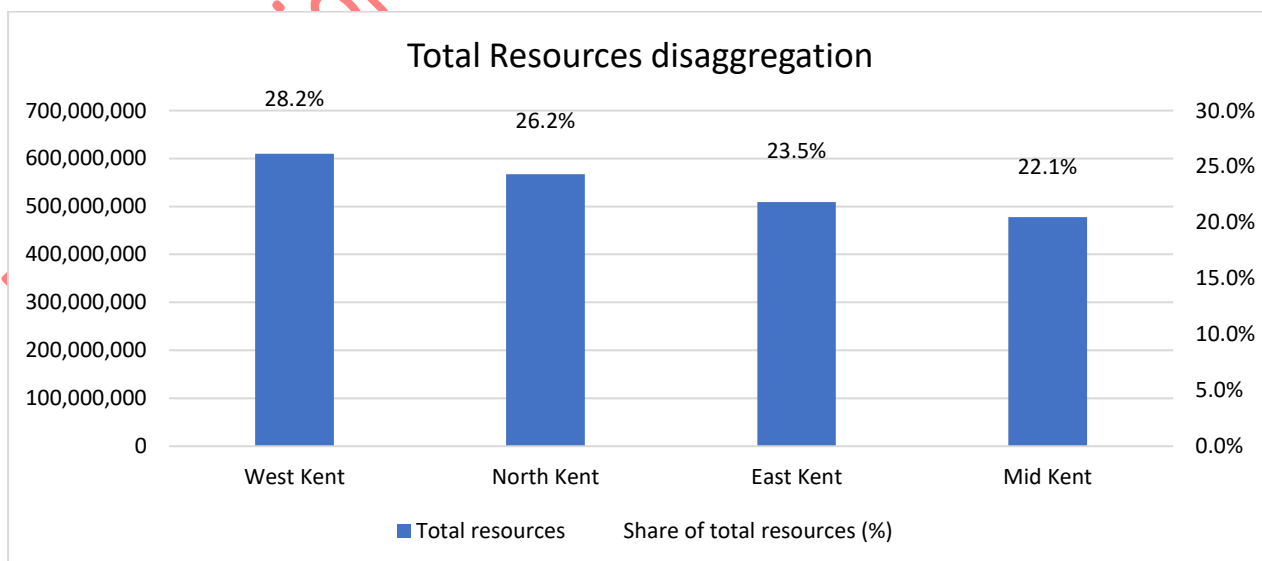
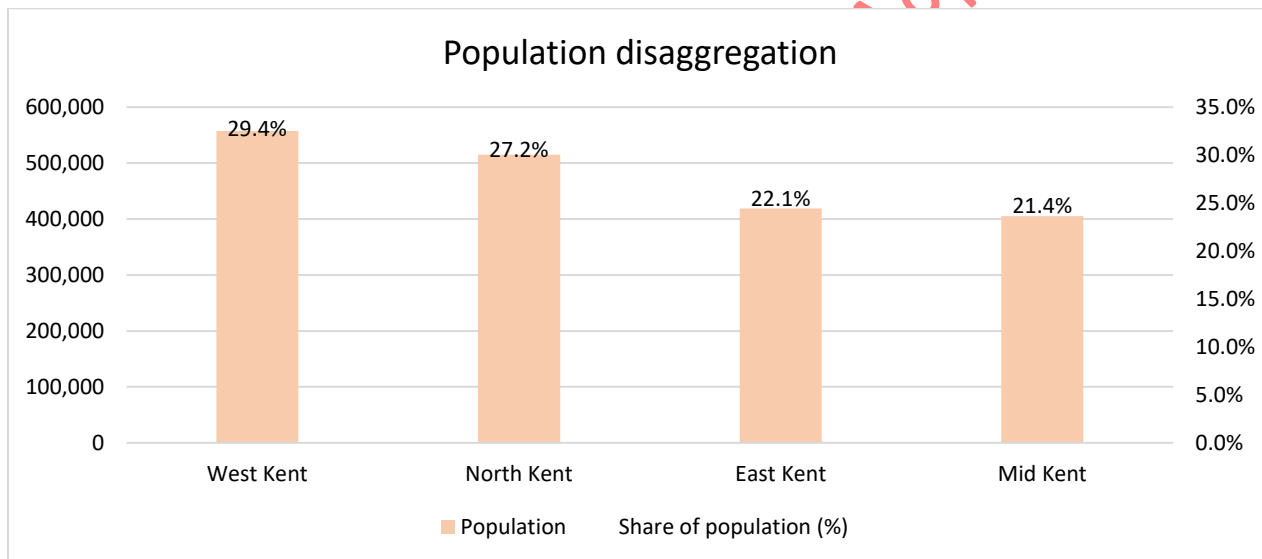
Councillor/population numbers:

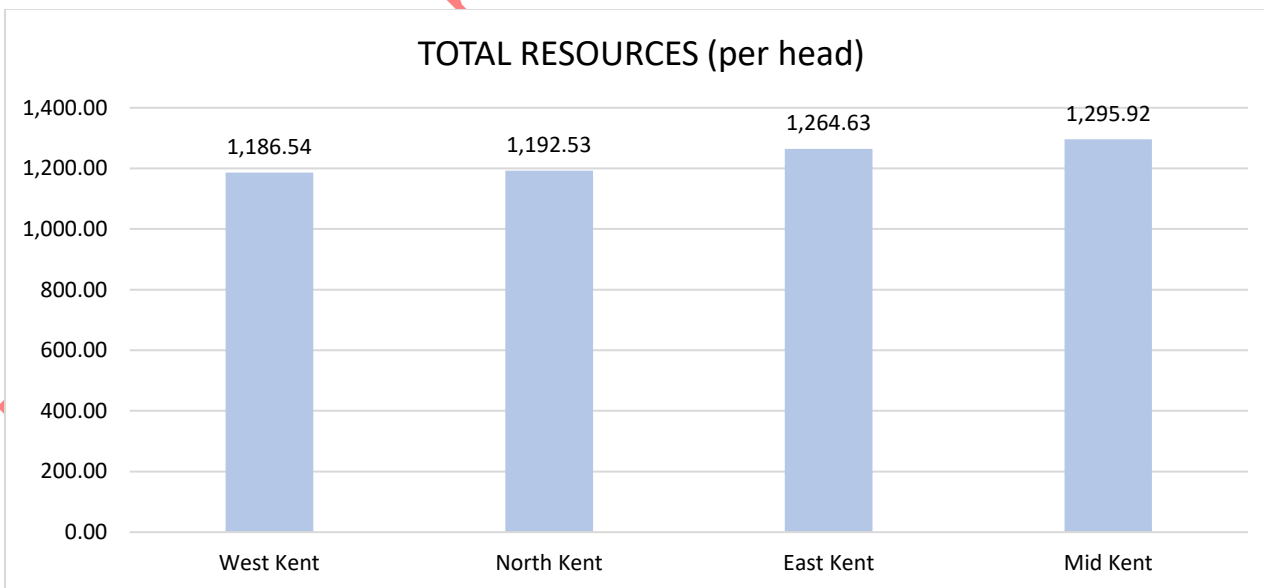
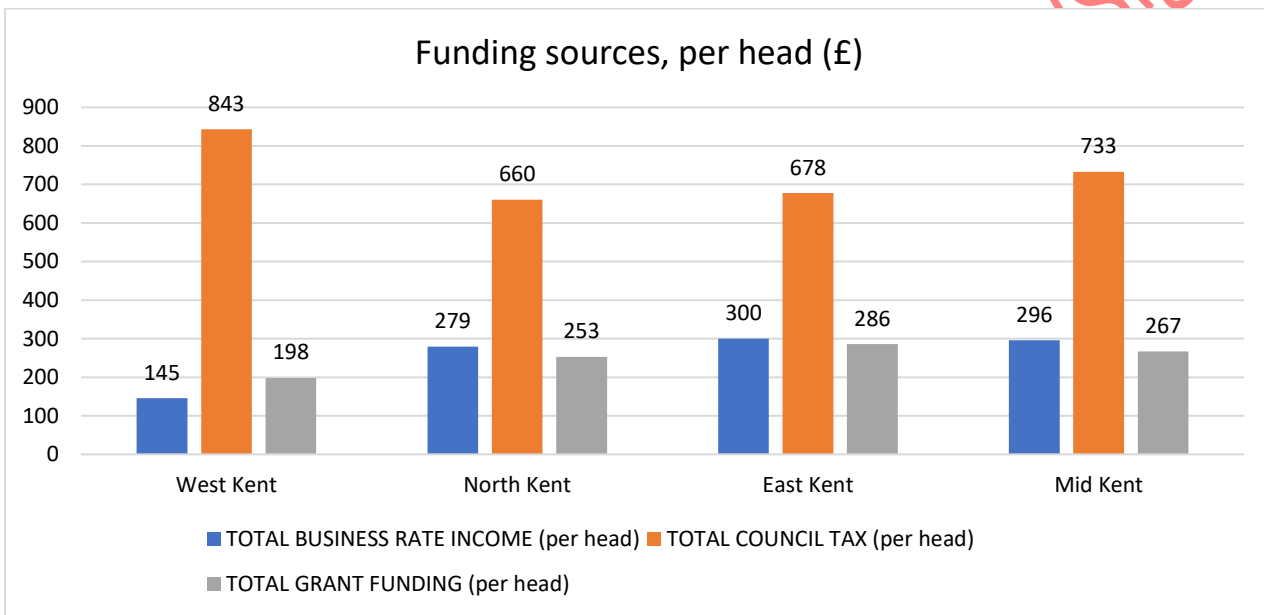
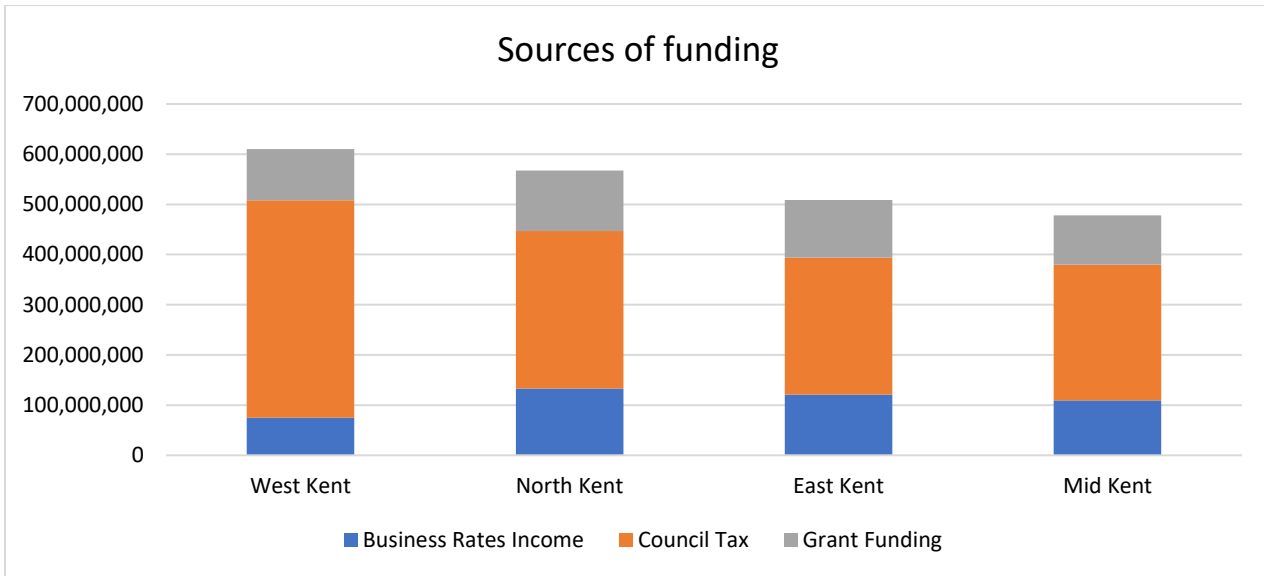
Proposed Unitary Option	District area	Population	Total	Per 30 Cllrs	Per 60 Cllrs	Per 100 Cllrs
Mid Kent	Ashford	138,283	405,171	13,505.70	6,752.85	4,057.71
	Swale	155,893				

	Folkestone and Hythe	110,995				
West Kent	Sevenoaks	121,262	557,657	18,588.56	9,294.28	5,576.57
	Tonbridge and Malling	135,206				
	Tunbridge Wells	117,020				
	Maidstone	184,187				
North Kent	Dartford	120,699	515,236	17,174.53	8,587.26	5,152.36
	Gravesham	107,737				
	Medway	286,800				
East Kent	Canterbury	159,939	418,969	13,965.63	6,982.81	4,189.69
	Dover	118,591				
	Thanet	140,439				
		1,897,051				

Funding Disaggregation Model

Information on major funding streams received by cluster (including Council Tax, grant funding and Business Rates Retention) using a model from Pixel which uses data from publicly available sources and Council returns to government.

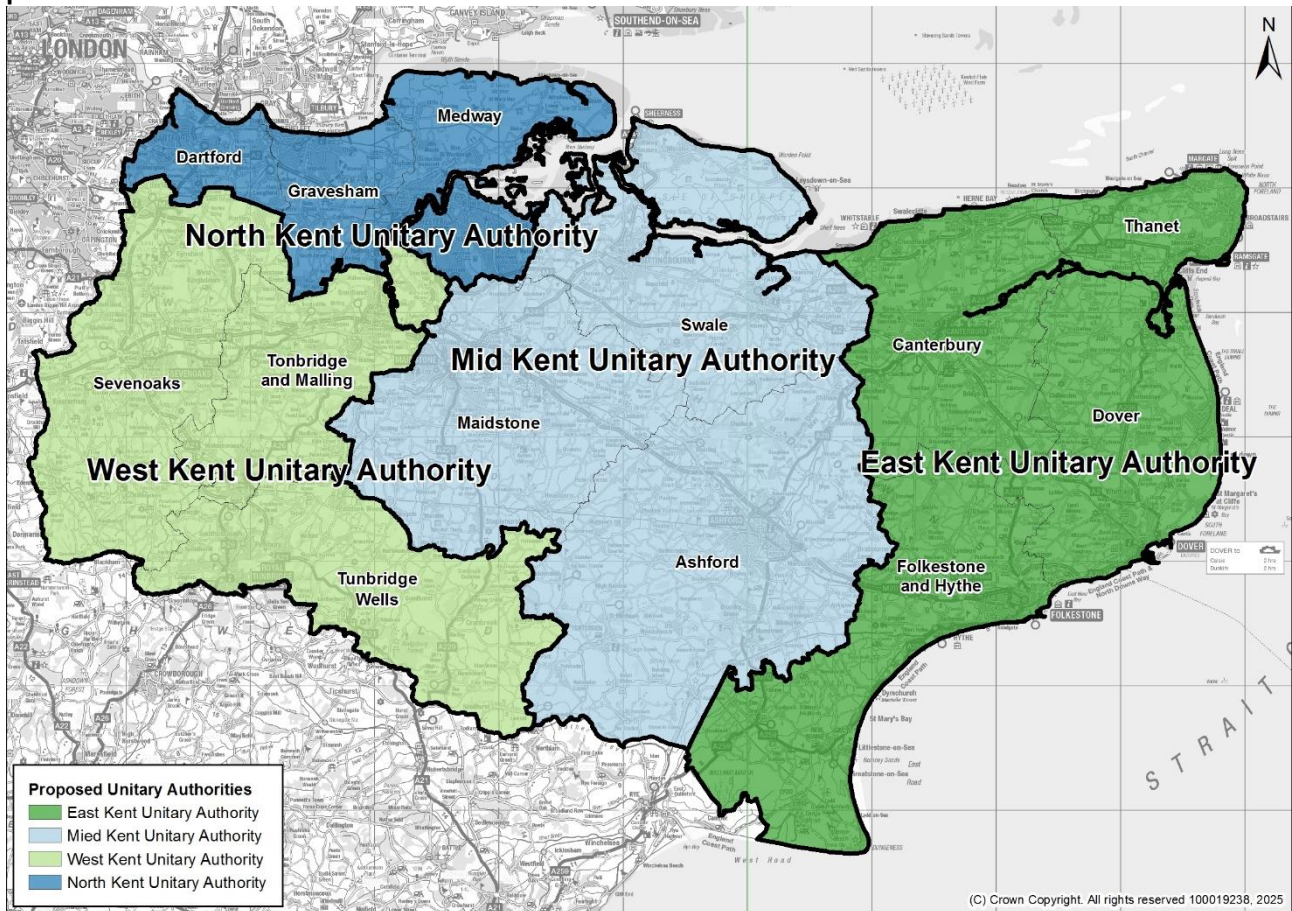




Section 3.4: Model 4 (Four Unitaries NEMidW)

Model 4 (four unitaries, NEMidW):	<p>North (Dartford, Gravesham, Medway)</p> <p>East (Canterbury, Dover, Folkestone and Hythe, Thanet)</p> <p>Mid (Ashford, Maidstone, Swale)</p> <p>West (Sevenoaks, Tonbridge and Malling, Tunbridge Wells)</p>
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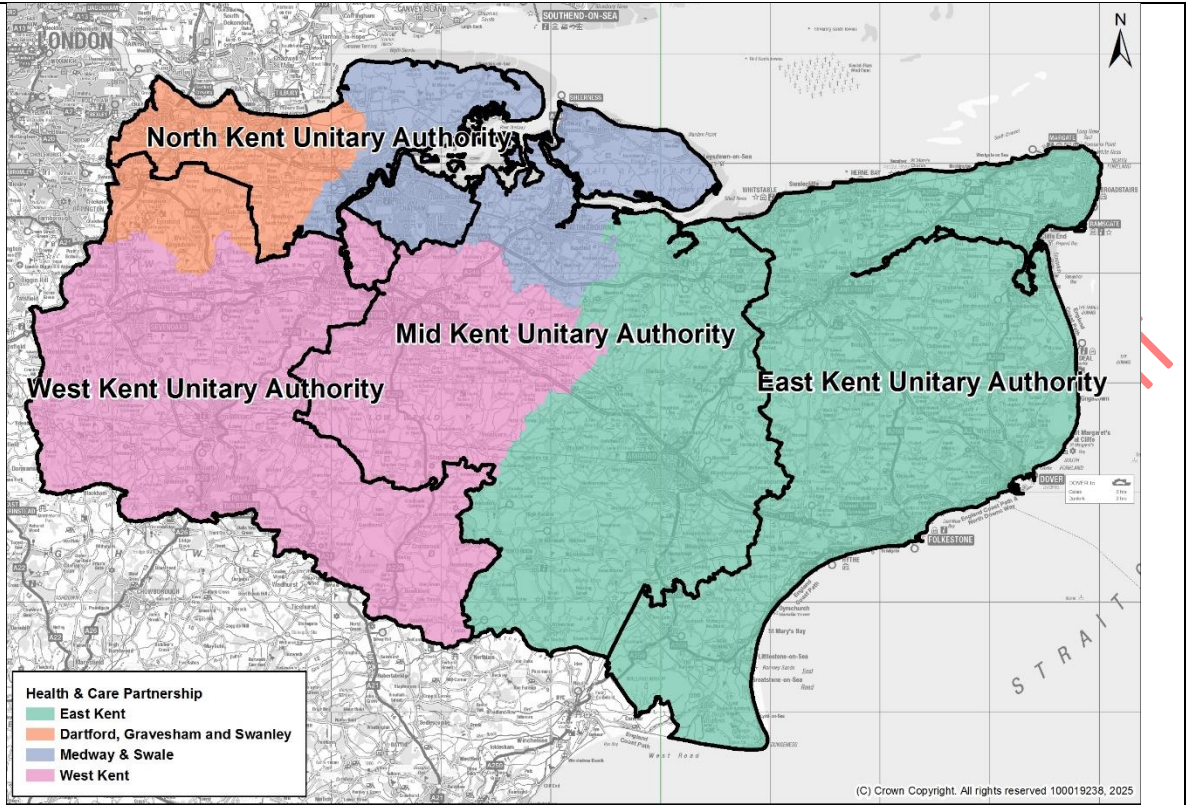
Map



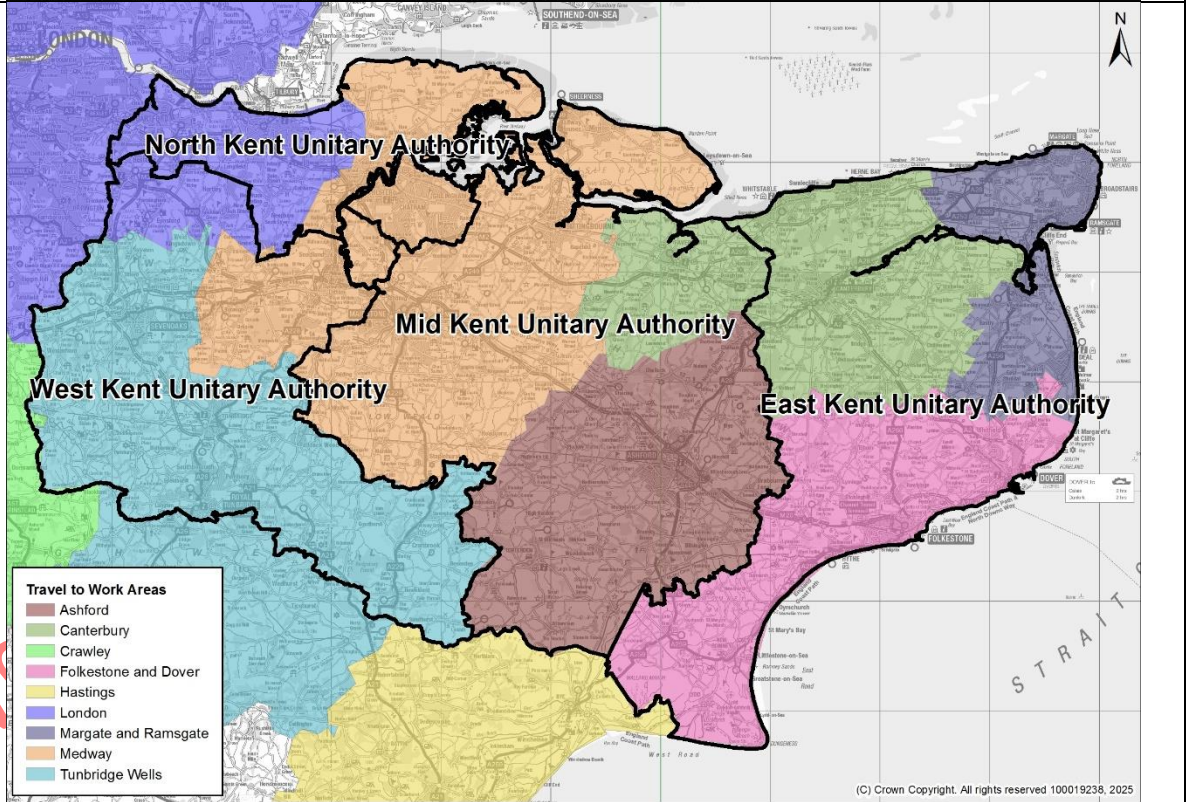
Population:	Potential Unitary	District	District population (mid-2022)	Unitary population (mid-2022)	Potential growth by 2035*
	North Kent		Dartford	118,820	508,492
		Gravesham	106,970		
		Medway	282,702		
East Kent		Canterbury	157,550	525,949	39k to 75k
		Dover	117,473		
		Folkestone and Hythe	110,237		
		Thanet	140,689		
Mid Kent		Ashford	135,610	470,657	46k to 66k
		Maidstone	180,428		
		Swale	154,619		
West Kent		Sevenoaks	121,106	370,795	21k to 52k
		Tonbridge and Malling	133,661		
		Tunbridge Wells	116,028		

*Two estimates based off the % growth between 2022 and 2035 for each district from: a) the ONS Sub-National Population Projections and b) the KCC Housing Led Forecast. Weighted by each district's contribution towards the UA's total population (2022 MYE).

NHS Health & Care Partnership alignment:

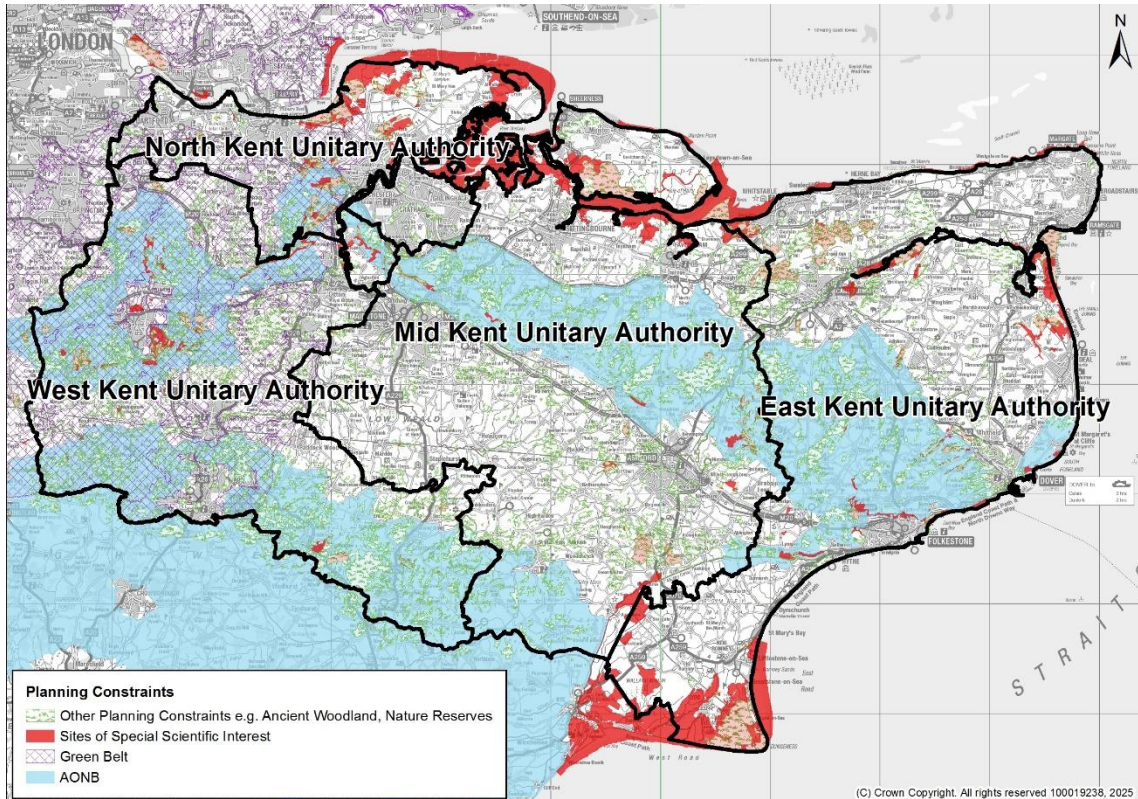


Travel to Work Areas:



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Spatial planning constraints:



Indicative Local Housing Need - annual (new standard method)

Potential Unitary	District	Indicative Local Housing Need (new method)	Estimated avg household size*
North Kent	Dartford	712	2,978 2.51
	Gravesham	672	
	Medway	1,594	
East Kent	Canterbury	1,216	3,969 2.27
	Dover	746	
	Folkestone and Hythe Thanet	859 1,148	
Mid Kent	Ashford	952	3,358 2.45
	Maidstone	1,358	
	Swale	1,048	
West Kent	Sevenoaks	1,149	3,342 2.41
	Tonbridge and Malling	1,096	
	Tunbridge Wells	1,098	

*Estimated by taking the average household size in each district (from Census 2021) and producing a weighted average based on the LHN.

Draft Version for Leaders

Social and Demographic Information Drawn from Oxford Consultants for Social Inclusion

Population Composition

	West	North	Mid	East	Kent	England
Males	48.47%	48.92%	49.24%	48.39%	48.72%	49.00%
Females	51.53%	51.08%	50.76%	51.61%	51.28%	51.00%
Population Aged 0-15	19.96%	21.14%	19.60%	16.92%	19.12%	18.50%
Population Aged 16 to 64	59.74%	62.79%	61.14%	59.28%	60.43%	62.88%
Population Aged 65+	20.30%	16.07%	19.25%	23.79%	20.45%	18.61%

IMD Score

Index of Multiple Deprivation 2019 (combining indicators under seven different domains of deprivation: Income Deprivation; Employment Deprivation; Education Skills and Training Deprivation; Health Deprivation and Disability; Crime; Barriers to Housing and Services and Living Environment Deprivation).

West	North	Mid	East	Kent	England
12.41	22.21	20.58	23.42	19.54	21.76

Unemployment

The proportion of working age people receiving benefits for unemployment.

	West	North	Mid	East	Kent	England
Unemployment benefit claimants (Jobseekers Allowance and out of work Universal Credit claimants)	2.37%	4.03%	3.37%	4.18%	3.47%	4.22%
Youth unemployment (18-24 receiving JSA or Universal Credit)	3.59%	6.71%	6.12%	6.14%	5.72%	5.46%
Older person unemployment (50+ receiving JSA or Universal Credit)	0.86%	1.51%	1.16%	1.38%	1.20%	1.65%
Unemployment benefit (JSA and Universal Credit), female	2.25%	3.67%	3.05%	3.47%	3.07%	3.75%
Unemployment benefit (JSA and Universal Credit), male	2.49%	4.40%	3.71%	4.93%	3.89%	4.71%

Average House Price

Average property price for all dwelling types between Dec-2023 to Nov-2024

West	North	Mid	East	Kent	England
£390,940	£287,693	£307,893	£267,553	£313,496	£313,307

Crime

Total recorded crimes and crimes per 1,000 people between Dec-2023 to Nov-2024.

	West	North	Mid	East	Kent	England
Total Crime	26,682	57,388	46,050	54,263	152,915	5,173,622
Rate	71.9	112.9	97.8	103.0	95.9	90.6

Health

Proportion of claimants of disability benefits from the DWP.

West	North	Mid	East	Kent	England
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Independence Payment (PIP)	6.48%	8.91%	9.02%	12.00%	9.24%	9.20%
Disability benefit (DLA)	2.02%	2.49%	2.66%	2.72%	2.51%	2.10%
Older people social care benefit (Attendance Allowance)	12.27%	13.71%	12.89%	14.49%	13.43%	13.23%
Households on Universal Credit, Disabled Child Entitlement	1.55%	2.37%	2.46%	2.56%	2.27%	1.82%
Households on Universal Credit - Limited Capability for Work Entitlement	3.94%	6.27%	6.17%	7.37%	5.97%	6.14%

Education

Level of Qualification of people aged 16+ from the 2021 Census.

	West	North	Mid	East	Kent	England
No Qualifications	14.89%	18.86%	18.99%	19.04%	17.96%	18.08%
Apprenticeship	4.88%	5.94%	5.98%	5.75%	5.61%	5.32%
Other	2.50%	3.04%	2.91%	3.00%	2.88%	2.76%
Level 1	9.66%	11.81%	11.50%	10.68%	10.79%	9.69%
Level 2	14.99%	15.61%	15.39%	14.17%	14.86%	13.32%
Level 3	16.28%	17.38%	17.30%	18.61%	17.42%	16.92%
Level 4/5	36.81%	27.37%	27.93%	28.74%	30.49%	33.92%

Councillor/Electorate numbers:

Proposed Unitary Option	District area	Electorate	Total	Per 30 Cllrs	Per 60 Cllrs	Per 100 Cllrs
Mid Kent	Ashford	95,087	336,801	11,226	5,613	3,368
	Swale	110,044				
	Maidstone	131,670				
West Kent	Sevenoaks	90,283	275,497	9,183	4,591	2,754
	Tonbridge and Malling	100,052				
	Tunbridge Wells	85,162				
North Kent	Dartford	84,833	367,424	12,247	6,123	3,674
	Gravesham	76,516				
	Medway	206,075				
East Kent	Canterbury	108,317	369,135	12,304	6,152	3,691
	Dover	87,238				
	Thanet	103,386				
	Folkestone and Hythe	70,194				
		1,348,857				

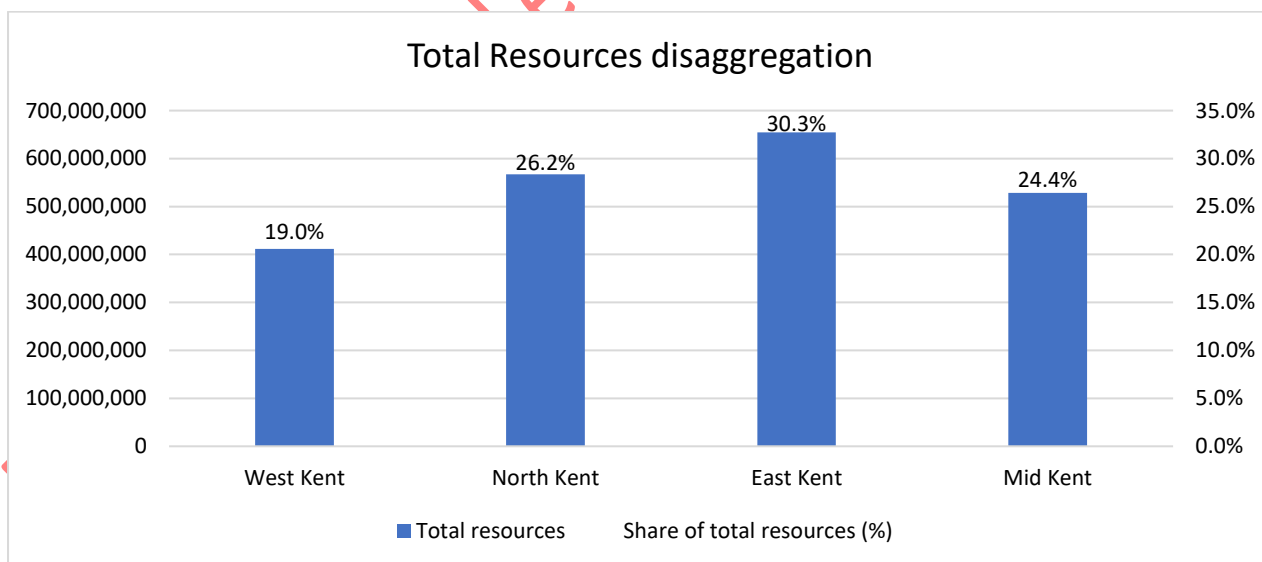
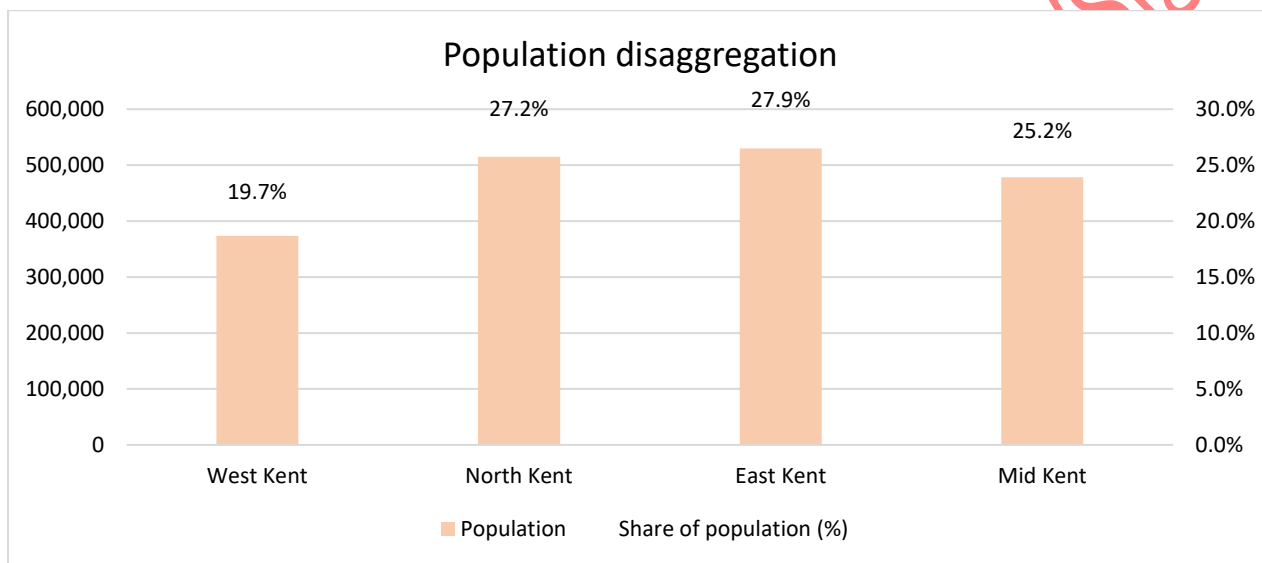
Councillor/population numbers:

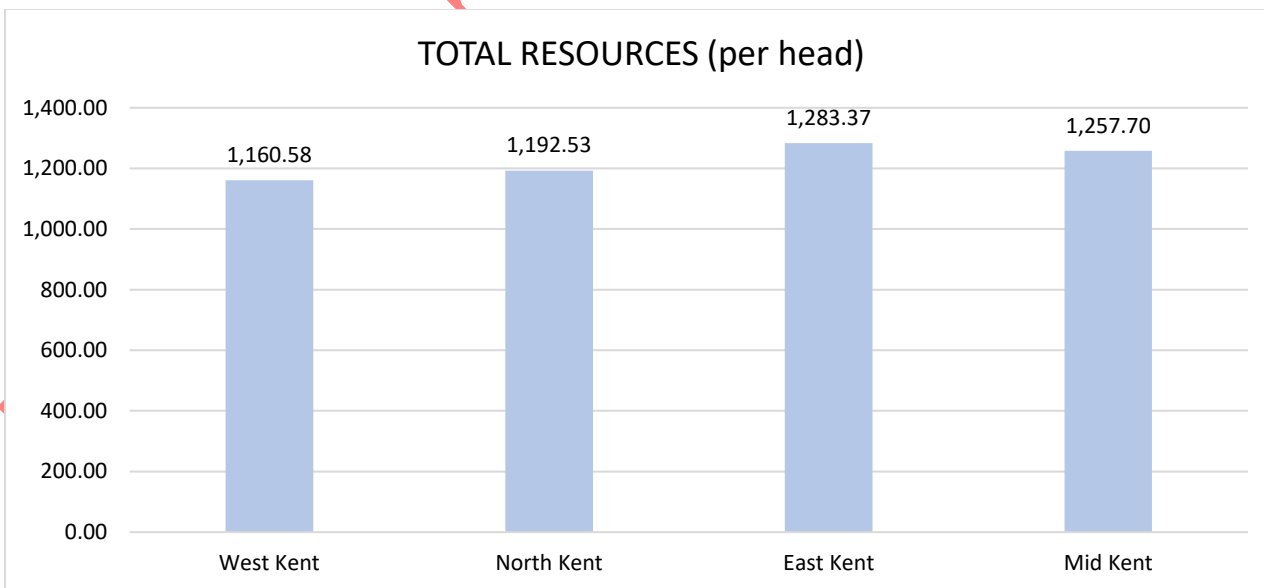
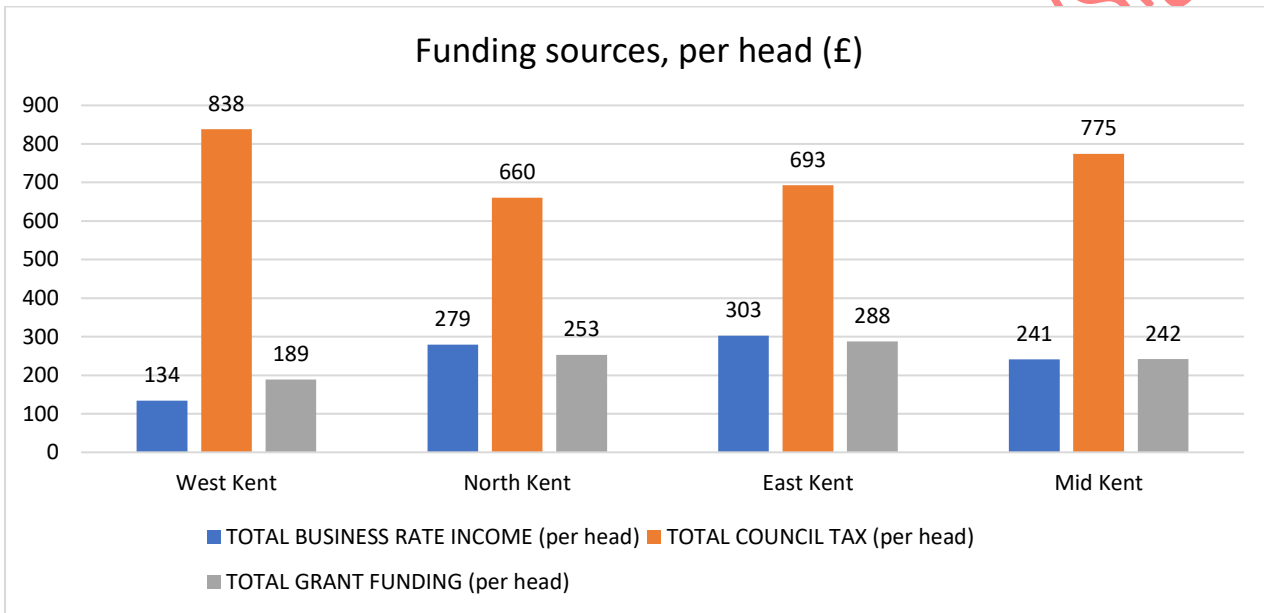
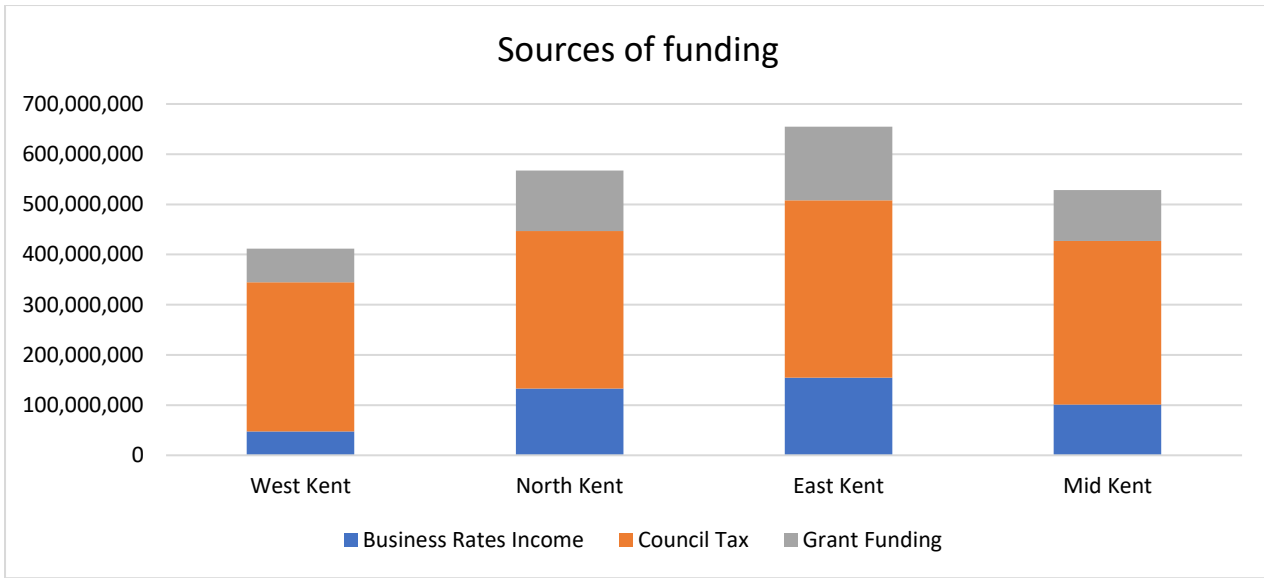
Proposed Unitary Option	District area	Population	Total	Per 30 Cllrs	Per 60 Cllrs	Per 100 Cllrs
Mid Kent	Ashford	138,283	478,363	15,945.43	7,972.72	4,783.63
	Swale	155,893				
	Maidstone	184,187				
West Kent	Sevenoaks	121,262	373,488	12,449.6	6224.8	3734.88
	Tonbridge and Malling	135,206				
	Tunbridge Wells	117,020				

North Kent	Dartford	120,699	515,236	17,174.53	8,587.26	5,152.36
	Gravesham	107,737				
	Medway	286,800				
East Kent	Canterbury	159,939	529,964	17,665.45	8832.73	5299.64
	Dover	118,591				
	Thanet	140,439				
	Folkestone and Hythe	110,995				
		1,897,051				

Funding Disaggregation Model

Information on major funding streams received by cluster (including Council Tax, grant funding and Business Rates Retention) using a model from Pixel which uses data from publicly available sources and Council returns to government.





Section 4: Financial Analysis

Given the fact that the criteria for the Interim Plans (set out in the Appendix to the Minister’s letter) included a requirement to “*identify likely options for the size and boundaries of new councils ... along with indicative efficiency saving opportunities*” (criteria B) and to “*include indicative costs and arrangements in relation to any options including planning for future service transformation opportunities*” (criterion C) but also the fact that Kent councils, as a whole, have been unable to collectively agree potential geographies, seven of the Kent councils commissioned PricewaterhouseCoopers to undertake a high-level financial analysis of the costs, benefits and implementation costs associated with the above four unitary models. The brief was shared with all Kent Council Leaders.

PwC’s model has used local figures provided by Kent councils together with public records (including Revenue Outturns and Revenue Account Budgets) together with actual figures and experiences associated with past unitarisation exercises. The model uses various inputs to assess benefits of reorganisation (in terms of staff, third party spend, property and democracy) with weightings applied to each of the detailed assumptions based on past experience and other factors, additional benefits arising from transformation opportunities as well as assessing both transition and disaggregation costs. The model then nets off the costs from the benefits to provide a net benefit over time and a payback period.

The assumptions contained within the financial analysis have been challenged and amended by both chief executives and S151 officers to reflect local circumstances and context. Both benefits and transition costs have been phased.

The results of the above analysis are that a three unitary option (Option 1 in the above models) delivers a net recurring benefit of £9.3m per annum whereas any of the four unitary options result in a recurring net additional cost of £5.4m per annum. Additionally, the upfront transition costs for establishing a three unitary model are lower, at approximately £42.6m, compared to around £54.7m for a four unitary model. The annual financial benefit of a three unitary model is approximately £3m higher, with a projected annual benefit of £37.7m, compared to £34.7m for a four unitary model.

In terms of payback, a three unitary model results in lower transition costs whilst delivering higher workforce and democratic support savings (albeit with a lower level of democratic representation). The payback period for investment in the new structure is relatively long due to the complexities and costs associated with disaggregation. A four unitary model incurs slightly higher transition costs, primarily driven by IT expenses and does not yield a payback period because of the significant disaggregation costs, including the replication of leadership structures and diseconomies of scale.

In terms of a balance review, a three unitary model is the most efficient option based on cost. Amongst the different four unitary options (models 2, 3 and 4), geographical permutations show little variability but option 4 results in the highest income forgone, making it less palatable compared to the alternative options.

Section 5: Initial Options Analysis

This section provides an initial assessment (recognising that more evidence will become available over time) of the proposed geographies against the government’s established assessment criteria for unitary local government and also a series of design principles agreed by Kent Council leaders.

MHCLG Unitary Assessment Criteria

MHCLG Criteria	Three unitaries (Model 1)	Four unitaries (Models 2, 3, 4)
<p>Single tier of local government:</p> <ul style="list-style-type: none"> ▪ Taxbases that do not create undue inequalities ▪ Will help increase housing supply 	<p>As set out above, the geographies yield broadly similar resources per head (varying from £1,187 to £1,277). Where there are larger taxbases and larger resources per capita this matches those areas where cost and demand are higher.</p> <p>The larger geographies provide for more balanced geographies in terms of spatial planning constraints and would allow for a more strategic perspective on housing allocations, infrastructure and planning decisions and would make Local Plan integration more straightforward.</p>	<p>All the above geographies yield similar resources per head.</p> <p>In terms of taxbase, each of the four unitary model yields one unitary that is significantly (100k) below the designated minimum population threshold: South in Model 2; Mid in Model 3; West in Model 4</p> <p>Model 4 yields a unitary (West Kent) that would struggle with significant spatial planning constraints. Smaller unitaries may struggle to take a strategic perspective on planning policy and development management and to resource the production and delivery of Local Plans (four as opposed to three). At the same time, smaller unitaries would arguably enable planning decisions to be taken closer to the communities affected.</p>
<p>‘Right sized’ local government:</p> <ul style="list-style-type: none"> ▪ Population >500k ▪ Supports efficiency and VFM ▪ Improves capacity and resilience to financial shocks ▪ Manageable transition costs 	<p>Model 1 provides three unitaries all with populations in excess of 500k. It also provides for larger taxbases and, as the PwC financial modelling shows, requires lower disaggregation and transition costs and provides greater opportunities for economies of scale. The scale of the unitaries also offers greater resilience to financial shocks.</p>	<p>In each model, some populations are in excess of 500k but each model also produces one population that is around 100k lower than this. Four unitaries would also lead to lower taxbases and (as the PwC financial modelling demonstrates), higher disaggregation and transition costs.</p>
<p>High quality, sustainable services:</p> <ul style="list-style-type: none"> ▪ Improves service delivery/ prevents unnecessary fragmentation ▪ Opportunities for public sector reform ▪ Improves delivery/mitigates risk to services 	<p>Model 1 uses existing Council boundaries which avoids fragmentation and lowers risk.</p> <p>Model 1 is also closely aligned with other public sector geographies (most significantly Health and Care Partnerships and acute trusts – which would be the most complex and expensive structures to reconfigure) which would provide opportunities for public sector reform. The proposal is also widely supported in stakeholder engagement.</p>	<p>Models 2-4 all use existing Council boundaries which avoids fragmentation and lowers risk.</p> <p>Alignment with other public sector geographies is not as ideal as Model 1 with some models splitting new unitaries across multiple health boundaries/catchment areas which will limit the potential for public sector reform.</p> <p>This model was supported by some stakeholders.</p>
<p>Meets local needs</p>	<p>Model 1 reflects established and recognisable historic, cultural and service</p>	<p>Models 2-4 reflects established and recognisable historic, cultural and service</p>

<ul style="list-style-type: none"> ▪ Is informed by local views ▪ Improves/mitigates risk to local identity, cultural identity and history ▪ Addresses local concerns 	<p>geographies (including the way in which some pan-county service geographies are managed). It does not provide perfect alignment to travel to work patterns but does map most closely on to acute trust geographies. The model is also supported by a number of partners who have been consulted.</p>	<p>geographies to a greater or lesser degree. As with Model 1, none of the four unitary models provide perfect alignment to travel to work patterns.</p>
<p>Supports devo arrangements:</p> <ul style="list-style-type: none"> ▪ Sensible population size ratios between local authorities and any strategic authority. 	<p>Model 1 delivers a population size aligned to the Government’s published minimum proposed criteria (500k). However, the size difference between the three Unitary Councils could vary by some 20 per cent.</p>	<p>The population size ratios varies from model to model but (as set out above) would yield one unitary of around 400k or less in each model.</p>
<p>Local engagement and empowerment:</p> <ul style="list-style-type: none"> ▪ Enables stronger engagement ▪ Delivers opportunity for neighbourhood empowerment 	<p>Would result in larger unitary councils with larger councillor to elector ratios. With future projected population growth, this model could yield very large unitaries over the lifetime of the new councils. This could be managed and mitigated through structural and policy options that facilitate stronger neighbourhood/community engagement (e.g. parish and town councils or area committees).</p>	<p>All three models provide for small unitaries and lower councillor to elector ratios. The models would also provide headroom for future growth.</p>

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Geographical Design Principles

Kent Council Leaders have agreed a number of geographical design principles (set out below).

Design Principle	Rationale
<p>Scale, capacity and resilience to deliver high quality and sustainable public services</p>	<p>The White Paper states that the size of the new unitary councils should be of sufficient scale to withstand financial shocks, and deliver high quality and sustainable public services, with a guide of 500,000 population. New councils must be of sufficient size to act as anchor institutions within their areas, both as major employers and purchasers of services to support market and service sustainability. Concerns about ensuring effective representation at scale need to be mitigated through organisational design principles.</p>
<p>Respects how people live and local identities</p>	<p>New councils should, as far as possible, align to the day-to-day reality of the local population they serve, with strong alignment around travel to work, travel to learn (particularly FE) and access to health (particularly acute) services.</p>
<p>Enhances Kent and Medway’s devolution ambitions to achieve better outcomes for our communities</p>	<p>Evidence from city-regions is that Mayoral Combined (Strategic) Authorities work better when the ‘constituent authorities’ are of broadly similar sizes, with the same statutory and service responsibilities as each other, as they provide a strong strategic partner to the directly elected Mayor in the MSA.</p>
<p>Optimises partnership working arrangements</p>	<p>A significant unique selling point of Kent and Medway is the co-terminosity of public services within the region, and an expectation we can quickly deliver the benefits of integration across county-district / district – unitary services, but also quickly move towards a developed public service reform programme through integration and enhanced joint working with police, fire, health and DWP. New council boundaries should facilitate and enable that speed of delivery and PSR agenda (recognising that some partner boundaries are more reconfigurable than others – in particular acute health geographies).</p>
<p>Maximise simplicity for residents and service users and clarity for the public</p>	<p>We need to recognise and appreciate the differential impacts for our existing organisations and what causes complexity (and risk) – district services being merged, KCC services being disaggregated and Medway experiencing both. As part of this, we should be looking to keep the breakup of existing council boundaries to a minimum (i.e. unless there are compelling reasons to do so).</p>

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Geographical footprint	Initial assessment against design principles
<p>Three unitary model</p> <p>(Model 1)</p>	<p>Pros:</p> <ul style="list-style-type: none"> ▪ Delivers large populations that should provide resilience to cost pressures (particularly in areas facing the most acute cost pressures) ▪ Would be likely to align well with health geographies (in particular acute trusts) ▪ Would be likely to align with local identities (including TTWA and education/health geographies) ▪ Would be likely to yield similar-sized unitaries ▪ Would be likely to deliver broad alignment with existing service partnerships ▪ Would be less complex and costly in terms of the disaggregating upper-tier service responsibilities. <p>Cons:</p> <ul style="list-style-type: none"> ▪ Population sizes would be likely to be in excess of the minimum specified (and likely to grow). ▪ Would be more likely to be remote in terms of elector to councillor ratios and scale. ▪ Some adjustments may be required to fit with HCP/Acute Trust geographies ▪ Would be unlikely to align well with major transport corridors ▪ Would yield four voting members (when considered alongside the MSA)
<p>Four unitary model</p> <p>(Models 2-4)</p>	<p>Pros:</p> <ul style="list-style-type: none"> ▪ Delivers populations closer to the ‘floor’ suggested by the White Paper with headroom for future population growth ▪ Less remote in terms of elector to councillor ratios and scale. ▪ Would be likely to deliver reasonable alignment with local identities (including TTWA and education) but not acute trusts. ▪ Would yield five voting members (when considered alongside the MSA) <p>Cons:</p> <ul style="list-style-type: none"> ▪ Would be likely to deliver variable-sized unitaries (including one or more well below the threshold specified in the White Paper). ▪ Would be likely to result in an insufficient taxbase/financial resilience for some areas of the county to cope with the cost of current and future projected service pressures. ▪ Would be likely to have poor alignment to HCP/Acute Trust geographies

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Appendix E

Themes discussed at public meeting held to discuss local government reorganisation

12 March 2025

Council Chamber – Swale House

Positives for Unitary Authority

Opportunity for local people to have more power devolved through Town and Parish Councils.

Ability for the Unitary Authority to focus on what Swale needs – more youth work, things for young people to do.

A lot more services under the same umbrella.

Reduce inefficiency (where councils contract out services you have shared responsibility, and these are often two tiers using same contractors for different things and paying twice and having different service levels).

It is currently hard to know currently which organisation to contact – example streetlights, it is KCC or SBC. This would be less under a Unitary Council.

Economy of scale would be easier with Unitary council - could bring services in house

One shop stop for services.

Easier control for central government and for Councils to have discussion with Central Government.

Opportunity to design services the way we want them.

Accountability - when people see the council tax bill they apportion the blame to Swale even though it is not us who are charging the council tax.

It will open up the council office sites for development (brown field).

There is the opportunity to do things properly that are failing at KCC – eg Home to school transport, SEND provision across Kent is poor, would have a chance to do this differently.

There needs to different view on planning to get the housing we need.

Negatives for Unitary Council

Parish and Town – Unitary won't be specific on community assets – football pitches, little areas that communities value we may losing things that are important to us.

People will be paying the same amount of council tax and then may not get the same level of service. If Parish and Town Councils pick up more, there will be a requirement for residents to pay twice.

Residents may not know who their ward councillors are.

Right to look at reform of local Government but this is the wrong answer, and it is too big. County Borough Councils do not work.

We should stick to 3 tiers – it has worked for the past 50 years.

3 times the population of Swale in one council is too big.

A Unitary Council would be more remote.

A Unitary Council would start asset stripping to pay for Adult Social Care.

Benefits of unitary in certain areas – but size of unitary council, the things that are important to the island won't be important to other people.

Much larger ratio of councillors to residents which could lead to people becoming remote from their council.

Will people want to travel the distance to attend meetings we are thinking struggle to get people to come to the council to ask questions – what will it be like if you are travelling further.

Could lose councillors who know the area.

Decisions don't reflect the local population views.

What must a Unitary Focus on for Swale?

Making sure our most vulnerable residents are cared for – those people need to be the people we think about first – we know that local government is the backstop that stops people getting into really difficult situations – sustainable model that helps people.

Engaging with residents – it is too hard currently for residents to engage with KCC.

People should be held accountable – and held to the Nolan Principles.

Ensure residents get the services they pay for.

Young People and services.

Making sure technology doesn't take the human element away.

Making sure residents are heard.

Geography

Three Unitary authority is best.

It needs to be guided by the data and numbers.

Align with Health and ensure that each Unitary authority has an A&E.

Whatever the geography ends up being Parish and Town Councils need to be involved .

People in Teynham tend to go towards Faversham and Faversham people tend to go to Canterbury.

Don't know the enough about the areas – we need more information to decide.

As long as it works – doesn't matter about the Geography.

Our heart is in East Kent.

Don't like the sound of North Kent – Faversham has always leant towards Canterbury – Social Care alignment wouldn't fit.

M2 Corridor – Sittingbourne Faversham and Canterbury – (would include Thanet).

Strain on Social Services if we go with Medway.

How would you like to be involved/informed going forward?

Articles and progress in Inside Swale.

Posters and public meetings.

Devolution data made available when we have it.

Parish and Towns being full involved.

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