

Agenda

Council Meeting

Date: Wednesday, 19 November 2025

Time 7.00 pm

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

Quorum = 16

Pages

Recording and Privacy Notice

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- (b) Exit routes from the chamber are located on each side of the room, one directly to a fire escape, the other to the stairs opposite the lifts.
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- (d) Anyone unable to use the stairs should make themselves known during this agenda item.

2. Apologies for Absence

3. Minutes

To approve the Minutes of the Meeting held on 1 October 2025 ([Minute Nos. 357 - 370](#)) as a correct record.

4. Declarations of Interest

Councillors should not act or take decisions in order to gain financial or other material benefits for themselves, their families or friends.

The Chair will ask Members if they have any disclosable pecuniary interests (DPIs) or disclosable non-pecuniary interests (DNPIs) to declare in respect of items on the agenda. Members with a DPI in an item must leave the room for that item and may not participate in the debate or vote.

Aside from disclosable interests, where a fair-minded and informed observer would think there was a real possibility that a Member might be biased or predetermined on an item, the Member should declare this and leave the room while that item is considered.

Members who are in any doubt about interests, bias or predetermination should contact the monitoring officer for advice prior to the meeting.

5. Mayor's Announcements

6. Questions submitted by the Public

To consider any questions submitted by the public. (The deadline for questions is 4.30 pm on the Wednesday before the meeting – please contact Democratic Services by e-mailing democraticservices@swale.gov.uk or call 01795 417330).

7. Questions submitted by Members

To consider any questions submitted by Members. (The deadline for questions is 4.30 pm on the Monday the week before the meeting – please contact Democratic Services by e-mailing democraticservices@swale.gov.uk or call 01795 417330).

8. Leader's Statement

9. Motion - 19 November - International Men's Day 5 - 6

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Issued on Tuesday, 11 November 2025

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

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Motion: 19 November - International Men's Day

This Council notes that 19 November is International Men's Day, a day recognised globally to highlight the contributions of men and boys, while also addressing the challenges they face.

Council further acknowledges:

- The persistently high suicide rates among men, who account for around three quarters of all suicides in England and Wales.
- The 2025 International Men's Day theme of "Celebrating Men and Boys."

Council pays tribute to the work of local and national groups, such as the Campaign Against Living Miserably, the Samaritans and MenTalk Health Swale and their tireless efforts in supporting men's wellbeing.

Council therefore resolves to:

1. Declare a mental health crisis in Swale.
2. Commit to ending the stigma around men's mental health through a comms campaign.
3. Actively promote the support services available to residents - including: Mind, MenTalk Health Swale Group, the Samaritans and CALM.
4. Call on central government and Kent and Medway NHS and Social Care Trust to urgently improve the doctor to patient ratio in Swale and to ensure better access to mental health services at the point of need.
5. Call on local schools to promote mental health awareness, particularly with boys.
6. Pay tribute to the men in our community who have tragically died by suicide and the families, friends and colleagues they have left behind who continue to suffer.

Proposed by Cllr Tom Nundy

Seconded by Cllr Paul Stephen

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COUNCIL	
Meeting Date	19 November 2025
Report Title	Sign-off of Community Governance Review Terms of Reference for Swale
EMT Lead	Larissa Reed – Chief Executive
Head of Service	Larissa Reed – Chief Executive
Lead Officer	Stephanie Curtis, Strategic Policy and Communities Manager
Classification	Open
Recommendations	That Council agree the adoption of the Terms of Reference for the Community Governance Review in Swale.

1 Purpose of Report and Executive Summary

- 1.1 This report sets out the process by which the council has drafted the proposed Terms of Reference for the Community Governance Review (CGR) for Swale and asks for their agreement by Council.

2 Background

- 2.1 The Local Government and Public Involvement in Health Act 2007 (Chapter 3 of Part 4 of the 2007 Act) devolves the power to local authorities to take decisions about matters such as the creation of parishes and their electoral arrangements to local government and local communities in England. Before a Parish or Town Council can be created the Council is required to undertake Community Governance Review (CGR)
- 2.2 Community governance reviews provide the opportunity for principal councils (SBC is the principal council) to review and make changes to community governance within their areas. This may include creating, merging, altering or abolishing parishes/town councils; their naming; their electoral arrangements; or grouping.
- 2.3 It was agreed at Council on the 30th July 2025 to undertake a Community Governance Review and also agreed the establishment and configuration of a Member Steering Group to lead on this piece of work.
- 2.4 The Member Steering Group has met and developed the draft Terms of Reference set-out within Appendix 1. It was felt to be very important by the Group that this was a Swale wide review that considers all proposals that could be taken forward within the scope of the review – as outlined in section 5 of Appendix 1.
- 2.5 A number of approaches have already been made by interested groups/parties for consideration within the review. These include:

- The establishment of a Town Council for Sittingbourne
 - The establishment of a Parish Council for Halfway
 - A name change for Warden Parish Council to Warden Bay Parish Council
 - Boundary changes for Bobbing and Iwade Parish Councils.
- 2.6 Existing Town and Parish Councils have also been contacted to invite them to put forward any proposals they would like considered as part of CGR.
- 2.7 These, along with those outlined in section 2.5 will be considered by the Member Steering Group as part of a wider assessment of which proposals will be taken forward to the first consultation stage.
- 2.8 Appendix 1 also outlines the timetable for the CGR. Under the act, we are required to complete the review, within 12 months of the start of the community governance review. The review begins when the council publishes terms of reference of the review and concludes when the council publishes the recommendations made in the review.
- 2.9 Policy and Resources Committee on the 5th November 2025 agreed the draft terms of reference and the onward recommendation for their adoption to Council.

3.0 Proposals

- 3.1 That Council agree the adoption of the Terms of Reference for the Community Governance Review in Swale.

4.0 Alternative Options Considered and Rejected

- 4.1 Not to undertake a Community Governance Review. It would be possible to pause any Community Governance Reviews (except any which are the result of a petition). This has been discounted as it is a piece of work which is in the Corporate Plan.

5.0 Consultation Undertaken or Proposed

- 5.1 Section 93 of the 2007 Act allows principal councils to decide how to undertake a community governance review, provided that they comply with the duties in that Act which apply to councils undertaking reviews. Swale Borough Council as the principal council will need to consult local people and take account of any representations received in connection with the review. When undertaking the review we must have regard to the need to secure that community governance reflects the identities and interests of the community in the area under review, and the need to secure that community governance in that area is effective and convenient.
- 5.2 Under the 2007 Act the council is required to consult local government electors in any area under review, and others who may have an interest in the review. Other

bodies might include local businesses, local public and voluntary organisations - such as schools or health bodies.

- 5.3 The Officers along with the Member Steering Group for CGR are developing robust plans for the delivery of the consultation to ensure its reach is as far as possible.

6.0 Implications

Issue	Implications
Corporate Plan	The work required to carry out Corporate Governance Reviews is in the Corporate Plan
Financial, Resource and Property	The cost of undertaking the CGR will be in the region of £10,000. Although we have no specific budget to undertake this piece of work, we have an officer working on Local Government Reorganisation and they will lead this piece of work
Legal, Statutory and Procurement	The Local Government and Public Involvement in Health Act 2007 (Chapter 3 of Part 4 of the 2007 Act) devolves the power to local authorities to take decisions about matters such as the creation of parishes and their electoral arrangements to local government and local communities in England
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, Town and Parish Councils are able to undertake work to improve Health and Wellbeing
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

7 Appendices

Appendix 1: Proposed Terms of Reference for Swale Community Governance Review

8 Background Papers

There are no background papers.

Swale Borough Council

Terms of Reference

Community Governance Review 2025/2026

1.Introduction

1.1 A community governance review will be carried out by Swale Borough Council under the provisions of the Local Government and Public Involvement in Health Act 2007 (“the 2007 Act”).

1.2 The review shall comply with the legislative requirements, have regard for the associated statutory guidance and will be conducted in accordance with these terms of reference.

2.What is a community governance review?

2.1 A community governance review provides the opportunity for Principal Councils (Swale Borough Council) to review and make changes to community governance within their areas, which reflect local identities and facilitate effective and convenient local government.

The Local Government and Public Involvement in Health Act 2007 sets out that a CGR can take place for the whole or part of the Borough and can consider one or more of the following:

- a. Creating, merging, altering or abolishing Parishes/Town Councils;
- b. The naming of Parishes and the style of new Parishes/Town Councils;
- c. The electoral arrangements for Parishes/Town Councils including: - the ordinary year of election; - the number of Councillors to be elected; and - the warding (if any) of the Parish/Town Councils;
- d. Grouping Parishes under a common Parish Council or degrouping Parishes.

2.2 The Council is required to ensure that community governance within the area under review will be:

- a. Reflective of the identities and interests of the community in that area; and
- b. Effective and convenient.

2.3 In doing so, the CGR is required to take into account:

- a) The impact of community governance arrangements on community cohesion; and
- b) The size, population and boundaries of a local community or Parish Council.

2.4 These requirements have been taken into account in defining the objectives and questions proposals will be assessed against.

3. What do Parish Councils do?

3.1 Parish Councils represent the most local form of government and can own land and assets, employ staff and provide services at a local level, this can include open space and recreation, cemeteries, grass cutting, street lighting etc. They can raise funds to meet the costs of administration and provision of services through setting a precept which forms part of council tax bills levied on council taxpayer's in

the parish. Parish Councils can also provide a local voice for the community responding to consultations and raising concerns with the relevant organisations.

3.2 A Parish Council is made up of parish councillors elected by the local government electors in the parish with elections taking place every four years. Vacancies within the four-year term are filled by co-option or by election if 10 local government electors request it.

3.3 A Town Council, which is likely to be a relevant consideration in this review, has the same powers and role as a parish council, but in addition can opt to style its chairman as Mayor.

4. Who will undertake the review?

4.1 As the principal authority Swale Borough Council is responsible for undertaking any CGR within its electoral area. A politically balanced member steering group has been established and will be overseen by Policy and Resources Committee, supported by SBC officers from appropriate departments.

5. Areas under review

5.1 The review will consider the establishment of Town or Parish Councils for Sittingbourne including but not limited to the following electoral wards Homewood, Roman, Murston, Kemsley, Milton Regis, Chalkwell, The Meads, Woodstock, with consideration of existing local council arrangements in these areas.

5.2 The review will also consider the establishment of Parish Council for Halfway in the electoral ward area Queenborough and Halfway with consideration of existing local council arrangements in these areas.

5.3 The review will also consider name change for Warden Parish Council to Warden Bay Parish Council

5.4 The review will also consider boundary changes as approached by Parish Councils or residents including Iwade and Bobbing.

5.5 It shall have particular regard for the need to secure that community governance within the area under review:

- reflects the identities and interests of the communities in that area; and
- is effective and convenient.

5.6 When carrying out the Community Governance Review, Swale Borough Council must also take into account other existing or potential community governance arrangements. A review does not mean there will be changes but will examine if there is a case for change.

5.7 Appendix A is a map of the borough including ward and parish boundaries for reference.

6. Assessment of proposals

6.1 Proposals will be assessed against the following objectives and questions: -

Objective 1

Support the Identities and Interests of Communities

- To recognise parishes as coming from the community, belonging to the community and requiring community support
- To listen and respond to the needs and concerns of communities

- To create fair boundaries that represent communities and avoid arbitrary differences between neighbours

Key Questions:

Does the community want a parish council and is it able to support one?

Does/would this parish represent a community or coherent communities?

Objective 2

Support Effective and Convenient Local Government

- To identify existing issues with parish boundaries and seek resolutions to them
- To minimise disruption to existing parishes through effective warding

Key Questions:

Is a parish council, or change to a parish boundary the most effective resolution to the community's needs?

Is this parish boundary practical and reasonable?

7. Consultation

7.1 The Council is required to consult the local government electors for the area under review and any other person or body who appears to have an interest in the Review and to take the representations that are received into account. The Council will also identify any other person who, or body that, it feels may have an interest in the Review and write to them inviting them to submit their views at all stages of the consultation.

7.2 Before making any recommendations or publishing final proposals, a full consultation process will form part of the Review to take full account of the views of local people and other stakeholders. The Council will comply with the statutory consultative requirements by:

- a) Consulting local government electors for the area under review;
- b) Consulting any other person or body (including a local authority) which appears to the Council to have an interest in the Review;
- c) Notifying and consulting Kent County Council; and
- d) Taking into account any representations received in connection with the Review.

7.3 The Council will publicise the Review by displaying a notice at the Council Offices and creating a dedicated page on the Council's website. The Council will also write to all potentially impacted Parish Councils or any other community or resident groups of which the Council is aware, Borough Councillors and the relevant County Councillors, and the MPs.

7.4 Information about each stage of the Review will be published on the Council's website. It will also be possible to view documents at: Swale Borough Council, Swale House, Sittingbourne, Kent ME10 3HT.

8. Indicative timetable

Event	Date
Consideration of Terms of Reference by Policy and Resources Committee	5 th November
Approval of Terms of Reference by Council	10 th December
Terms of Reference published	17 th December
First consultation stage	18 th December-9th February 2026
Approval of draft recommendations by Policy and Resources Committee	11 th March
Approval of recommendations by full council	1 st April
Second consultation Stage-draft recommendations	13 th April-12 th June
Final recommendations considered by Policy and Resources Committee	September
Final recommendations approved by Council	End of September
If applicable Community Governance Orders made	October/November

9. Electorate Forecasts

9.1 When considering the electoral arrangements of the Parishes in the area the Council must consider any likely future changes in the number or distribution of electors within five years (2030 forecast).

9.2 The Review will use the latest electorate figures available at a parish level together with the estimated delivery of new dwellings within the five year period taken from the Council's most recent forecast.

10. Consequential Matters

10.1 When the required consultation has been undertaken, and the Review completed, the Council may make an Order to bring into effect any decision that it may make taking account of the role of the Local Government Boundary Commission for England. If the Council decides to take no action, then it will not be necessary to make an Order.

10.2 If an Order is made it may be necessary to cover certain consequential matters in that Order. These may include: a) The transfer and management or custody of any property; b) The setting of a precept (Council tax levy) for the new Parish Council; c) Provision with respect to the transfer of any functions, property, rights and d) Liabilities; e) Provision for the transfer of staff, compensation for loss of office, pensions and other staffing matters.

10.3 It may also be necessary as a consequence of this review, in cases where Ward boundaries need to change to match Parish boundaries, for the Council to submit a Requested Alteration(s) to the Local Government Boundary Commission for England in order to request a change. Further, where certain changes are required to parish wards it may be necessary to seek consent from the Local Government Boundary Commission for England.

10.4 The Council will also take into account the requirements of the Local Government Finance (New Parishes) Regulations 2008 when calculating the budget requirement of any new Parish Councils when setting the Council tax levy to be charged.

Following the review the Community Governance Review Steering Group shall make recommendations as to:

- whether or not to establish a new Town/Parish Council in the identified areas.
- The electoral arrangements of any new parish or town council – including the ordinary year of election, warding and number of councillors; the review shall invite and take account of submissions from all interested parties.

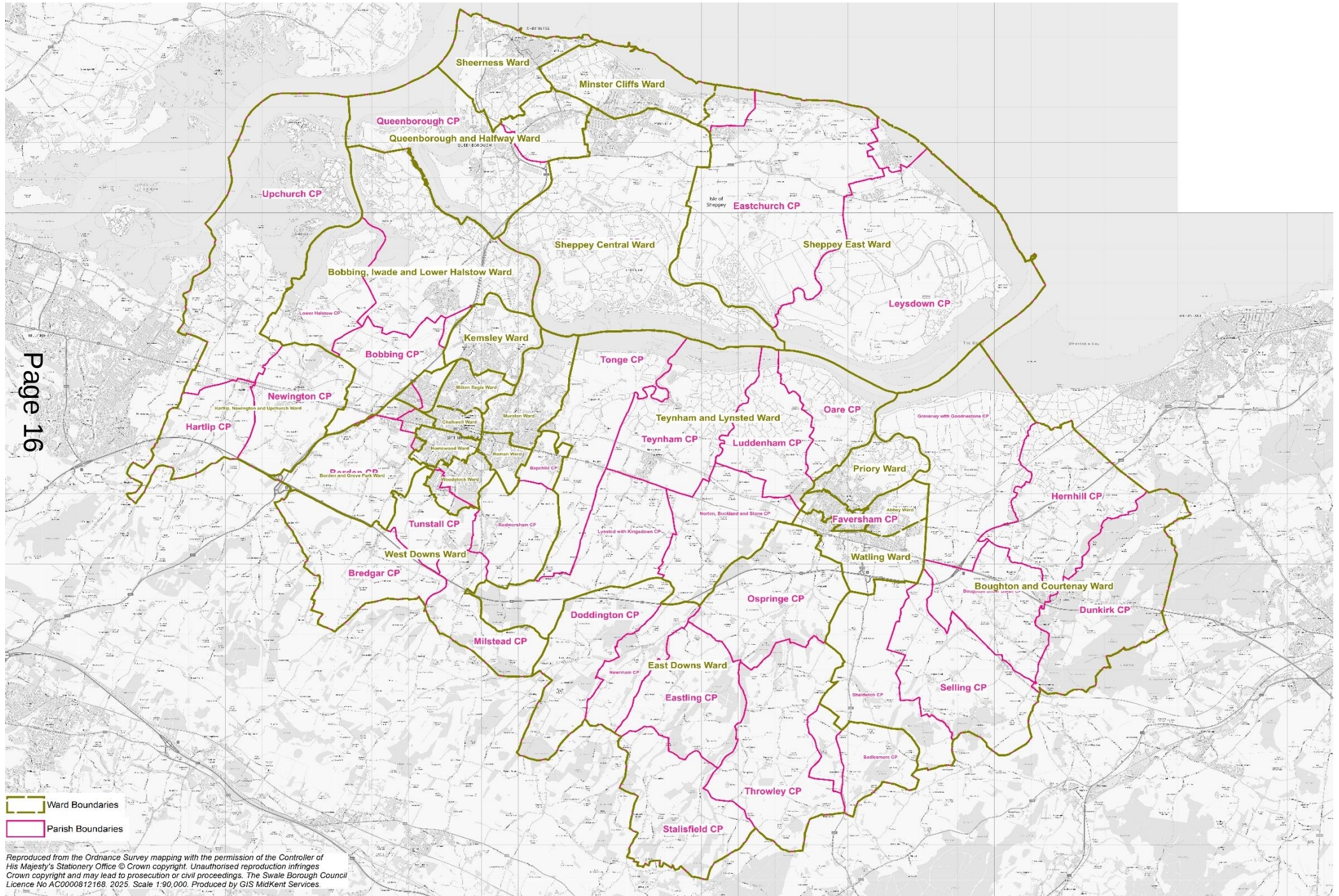
11. Representations

11.1 Swale Borough Council welcomes representations during the specified consultation stages as set out in the timetable from any person or body who may wish to comment or make proposals on any aspect of the matters included within the Review.

11.2 Representations may be made:

By post:

Swale Borough Council
Swale House
East Street
Sittingbourne
ME10 3HT



Council	
Meeting Date	19 November 2025
Report Title	Local Government Reorganisation Submission of Business Case to Government
EMT Lead	Larissa Reed – Chief Executive
Head of Service	Larissa Reed – Chief Executive
Lead Officer	Stephanie Curtis, Strategic Policy and Communities Manager
Classification	Open
Recommendations	1. For Council to agree which Business Case option should be put forward to Government for Local Government Reorganisation for Kent and Medway. 2. For Council to provide Delegation to the Chief Executive to submit the agreed proposal to MHCLG by the 28 November 2025 and to undertake any other necessary steps as part of this process.

1 Purpose of Report and Executive Summary

- 1.1 Following the publication of the English Devolution White Paper in December 2024, all councils in Kent and Medway were invited in February 2025 by the Secretary of State to submit proposals for local government reorganisation (LGR) for the region of Kent.
- 1.2 This paper provides an overview of the collaborative work that has taken place since February 2025 on LGR between all Kent Councils, and a summary of the business case(s) due to be submitted to government on 28 November 2025.

2 Background

- 2.1 Kent and Medway's 14 Local Authorities have a strong history of working closely together on shared risks and opportunities, lobbying on significant areas of common interest, and on responding collectively to strategic developments nationally or regionally. This is primarily through existing groups including Kent Council Leaders (a group made up of Kent's 14 elected Council Leaders) and Joint Kent Chief Executives (a group made up of the Chief Officers of Kent's 14 Local Authorities alongside our wider strategic local partners).
- 2.2 On 16 December 2024, HM Government published the English Devolution White Paper setting out its ambition to reshape local government in England. This would be through a combination of devolution to new strategic authorities and reorganisation of all of the remaining two-tier local government areas in England

into unitaries. The English Devolution and Community Empowerment Bill published on 10 July 2025 formalised HM Government's intentions to enact these changes.

- 2.3 In response to the White Paper, Council Leaders in Kent were invited to apply for, and submitted a formal request to receive priority status to be included in the Devolution Priority Programme (DPP). If successful, this would have accelerated the devolution process and provided additional Government support for those Councils on the DPP.
- 2.4 On 5 February 2025 Government notified Councils in Kent and Medway in a letter from the then Local Government Minister that they were not selected to be on the DPP and instead received a statutory invitation to submit proposals for Local Government reorganisation (LGR). This included guidance around the development of proposals and an expectation that all 14 Councils would collaborate.
- 2.5 The letter detailed a timeline for the process, including a requirement for a joint interim proposal by 21 March 2025 setting out direction of travel and intentions, and a deadline of 28 November 2025 to receive a final submission on reorganisation. Kent Council Leaders agreed to endeavour to work together to respond to the Minister's direction.
- 2.6 On 21 March 2025, Kent Council Leaders submitted an interim response setting out the councils' commitment to working together on reorganisation, highlighting examples of exceptional challenges faced only by Kent, the importance of aligning devolution with reorganisation and the risks of not having a strategic countywide body for Kent. Alongside the collective response signed by all 14 Council Leaders, there were a number of 'side letters' from individual councils in Kent.
- 2.7 Government have been clear that councils are expected to work together to develop LGR proposals for their areas. Each area nationally has been awarded funding to contribute towards the development of proposals. Kent and Medway were awarded £514,410.
- 2.8 Kent Council Leaders agreed to use this money collectively to develop a shared evidence base, options appraisal and business case(s) to prepare for the 28 November 2025 submission and procure the necessary external support and expertise to meet the deadline. KPMG were appointed as the Kent Councils Strategic Business Partner following a joint procurement process for Phases 1 and 2 as set out below and commenced work with all 14 Councils in July 2025.
- 2.9 The work was spilt into 4 phases as below:
 - Phase 1 – Evidence Base and Options Appraisal
 - KPMG work with all 14 Councils to develop a single, impartial, shared evidence base and options appraisal, identifying a long list of options (geographies) and appraising them according to the Minister's specified criteria.

- Phase 2 – Strategic Business Case Development
 - KPMG has been working with all 14 Councils on preparing and refining the chosen options into strategic business cases in preparation for 28 November 2025 submission deadline.
 - Phases 3 and 4 – Ongoing Support to Vesting Day Requirements
 - Following Ministerial decision, significant work will then be required to prepare for transition from the existing 14 Councils to the new Unitary Council(s) in a safe and legal way. Phase 3 will run from Ministerial decision to election to shadow authority(s), and Phase 4 from election to shadow authority(s) to vesting day (the day upon which formal responsibility is handed over).
- 2.10 A further procurement process will be required for any additional external support determined necessary for Phases 3 and 4. The existing contract with KPMG is for Phases 1 and 2 only.
- 2.10 At an extraordinary Kent Council Leaders meeting 3 September 2025, Leaders were presented with the evidence base and options appraisal assembled by KPMG colleagues with significant input from staff across all 14 Councils. There were seven geographies in scope.
- 2.11 As per the governance jointly set around the strategic business partner contract and the funding from Government, each Leader was asked to select the option they would support progressing to strategic business case, the two with the most support then being prioritised for the collective process. As a result of the debate, Options 3a and 4b were selected to progress (see appendix 1 and 2 for business cases executive summaries – please note these reference appendices contained within the main business cases that are available on the Kent Leaders website – see website link referenced within this report).
- 2.12 Leaders were then asked to consider on whether they would like to progress any additional options to strategic business case at an additional cost, requiring a simple majority (8 out of 14 Leaders) to progress as part of the jointly funded work. After discussion by the leaders, Options 1a, 4c, 4d and 5a did not attract a majority and as such were not agreed to progress within the jointly funded work. Maps setting out the various unitary geography options at each stage of the selection process are contained in Appendix 3.
- 2.13 Subsequently, Kent County Council (Option 1a), Medway Council (4d) and Dartford and Gravesham Borough Councils (5a) (see appendix 4, 5 and 6 for their business case executive summaries) determined they are willing to self-fund strategic business cases for their specified options. These had progressed as part of the joint process with support from the jointly appointed strategic business partner and aligned with collective work around the shared evidence base and overarching governance and timescales. Ultimately, strategic business cases can be submitted by individual councils or groups of councils. Each council can only support one case.

- 2.14 Timescales leading up to 28 November 2025 submission have been tight and as such, a regular rhythm of collaborative governance meetings, milestones and activity was established. These include:
- Steering Group – weekly chief executive and senior officer meetings to oversee the activity leading into the strategic business cases and ensure it is delivered to time and on budget with the strategic business partner.
 - Local Authority Chief Executives – weekly Programme Board role in terms of officer decision-making, oversight, and liaison with Leaders.
 - Kent Council Leaders – meetings at regular intervals and at key milestones to ensure the process is genuinely politically-led and proceeds as per Leaders collectively agreed approach, ultimately producing what Leaders need to satisfy governance in each of their individual Councils and enable a submission on 28 November 2025.
 - Kent Finance Officer Group – fortnightly meetings working with KPMG on the information including in the financial model.
- 2.15 Following submission, it is likely there will be a period of several months until we receive notice of the Minister's decision on a selected option and geography. Early indications are this will likely be between Spring/Summer 2026.
- 2.16 The Structural Change Order (SCO) that officially creates the new councils, the shadow elections and vesting date, will likely be enacted after the summer recess in 2026.
- 2.17 In the interim, learning from other areas that have been through reorganisation before, it will be important for Councils to collectively prepare for Phases 3 and 4 so that they will be ready to progress the necessary and extensive transition work required to ensure services are safe and legal on day 1 of the new Unitary Council(s).
- 2.18 Therefore, whilst waiting for decision, it is envisaged that Kent Council Leaders and Chief Executives will work collaboratively and focus on putting in place the arrangements required and to determine any procurement activity they deem necessary for a strategic business partner for Phases 3 and 4.
- 2.19 Each council is invited to submit a proposal which covers the whole of Kent. A Council can choose not to submit a proposal; however this does not mean that they will be exempt from LGR, they will be consulted on the chosen proposal.
- 2.20 Once the proposals have been received, they will be assessed against the following criteria.
- Establishing a single tier of local government
 - Efficiency, capacity and withstanding shocks
 - High quality and sustainable public services
 - Working together to understand and meet local needs
 - Supporting devolution Arrangements
 - Stronger Community Engagement and neighbourhood empowerment

3.0 Proposals

3.1 Appendices 1-5 detail the Business Case Executive Summaries. The full versions of the business cases have been published at [Councils Reveal Draft Business Cases for New Councils - Kent Council Leaders](#).

3.2 The outline of each business case is as follows:

Option	Where Swale Sits	Pros	Cons
1a – Single authority with 3 assemblies	Swale will be part of the Single Unitary Council	-No disaggregation costs (some aggregation costs) -Less disruption for staff and residents -The ability to share costs across a wider areas	-Would not enable devolution (as requires 2 councils for devo) -11,000 residents per councillor -Large area – could lead to impersonal services
Option 3a – 3 unitary councils	Swale, Medway, Gravesham and Dartford	-Three balanced councils -lower disaggregation costs and a shorter payback period	-The unitary containing Swale does not meet the resident's idea of sense of identity or community - Fewer councils will mean more residents per councillor
Option 4b – 4 unitary councils	Swale, Ashford, Folkestone	-Already share services with Ashford -More aligned with residents' sense of identity -Manageable payback period -Better ratio of councillors to residents than options 1a and 3a	-Swale currently has no links with Folkestone and Hythe -The payback period (although manageable is longer than in options 1a and 3a)
Option 4d – 4 unitary councils	Swale will be split up into 3 different councils	-Residents in Faversham look towards the East of the County. - Manageable payback period. -Better ratio of councillors to residents than options 1a and 3a	-This option splits up Swale including splitting existing parishes - The payback period (although manageable is longer than in options 1a and 3a)

Option 5 – 5 unitary councils	Swale will be split up into 2 different councils	-This option has the best resident councillor ratio -smaller councils so more local services -better health links than other options	-longest payback on all councils (may never payback the set up costs) -This option Splits up Swale.
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3.3 There are pros and cons for each business case and as such there is no officer recommendation

3.4 Ultimately Government will decide on the option for Kent based on the criteria

Financial Analysis

3.5 The cost of developing a business case is being funded from a government grant of £514,410 paid directly to KCC. The procurement of management consultants, KPMG was undertaken by KCC based on a specification determined by Kent Leaders and Chief Executives of all 14 authorities.

3.6 KPMG have provided and used a model to assess the unitary options submitted by individual councils using Government-defined criteria. Their approach is based on a high-level, top-down financial model that estimates the impact of disaggregating and aggregating existing services. This model applies broad assumptions regarding potential savings in staffing, property, and third-party expenditure based upon information requested by KPMG and supplied by the Kent Authorities.

3.7 The modelling is based on current budgeted 2025-26 spend and forecast spend in subsequent years from the 14 individual councils. As far as possible this spend has been compiled on a like for basis using the definitions used in statutory returns. These are based on net service spend before any income from central government grants or local taxation. This may differ from how spend is reported internally within the individual councils.

3.8 KPMG's financial model is made up of three elements

- Implementation costs – estimates the one-off transition costs associated with moving to a new unitary model
- Disaggregation costs – estimates the additional recurring expenditure that results from moving to a new unitary model
- Reorganisation savings – estimates the annual high-level savings potential from efficiencies that can be unlocked through reorganisation (e.g. workforce, governance, systems etc.)

The following table provides comparison of key financial information across the options being considered for Kent and Medway

Table 1 – Financial modelling assumptions

Costs and Savings	1A	3A	4B	4D	5A
One-off implementation costs	£99.4m	£127.7m	£130.9m	£135.9m	£139.1m
Recurring disaggregation costs*	£6.0m	£19.7m – £29.2m	£32.9m – £48.6m	£32.9m – £48.6m	£46.0m – £68.1m
Recurring reorganisation savings	£69.0m	£69.4m	£67.5m	£67.5m	£65.7m
Payback period	3.3 years	5.4 – 6.7 years	7.8 – 14.3 years	7.9 – 14.5 years	14.0 years – no payback

* The range demonstrates the sensitivity of changing just one of the cost assumptions in the model between 0% and 1% for disaggregation costs following collaborative discussions around different scenarios for the impact of LGR on commissioned spend across adult and children's social care. The range is not required for 1a as there is no disaggregation of social care.

3.9 The Kent Finance Officer Group (KFOG) have collectively agreed on the following position on the analysis carried out:

- LGR, whilst generally expected to be positive for local government finances in the long term, will not solve the cost, demand and associated funding challenges currently being faced. The scope of the financial modelling considers purely the impact of reorganisation, all other things being equal.
- The work carried out at this stage is not a zero-based exercise of the financial impact of LGR. Assumptions are based on the past LGR business cases produced to support other areas which have been through the LGR submission process in recent years.
- Due to the size and number of councils in Kent, there is not a fully comparable example of recent reorganisations elsewhere in the country to confidently benchmark against. Due to the level of complexity, payback periods in Kent may therefore be longer than some other reorganisations.
- The speed of delivery and level of savings post vesting day of the new councils will largely be impacted by decisions already made by the predecessor authorities and those taken by the new authorities. These include decisions in relation to contractual obligations, borrowing, transformation and wider public service reform.
- The financial modelling does not take account of how transition costs will be funded.
- The assumptions in the model have not been tested against actual outturn data for any of the previous local government reorganisation programmes.
- Given the context above, the modelling should not be seen as a set of targets that new authorities may be held to account for, as setting the post-vesting day budget will be the responsibility of the new authorities.

- Consolidation of assets, reserves and debt is outside the scope of this work and will have material implications under any of the unitary options proposed.
- 3.10 Whilst being fully supportive of the long-term benefits of LGR, all Kent Finance officers agree that LGR does not in itself provide a viable solution to the scale of the financial challenge faced. The modelling is a high-level assessment of the quantum and timing of potential additional revenue costs and savings arising from the reorganisation of councils. The modelling is designed to enable a reasonable like for like comparison of the potential costs and savings and ultimately pay-back periods under the possible different new unitary configurations. As such it does not make any assessment of financial viability of future new unitary councils.
- 3.11 However, there are limitations to this methodology. The model does not fully reflect the operational complexities of local government, including:
- Evolving property usage post-pandemic, which may affect assumptions around estate rationalisation.
 - Long-term contractual arrangements that may restrict the ability to realise economies of scale.
 - Local variations in service delivery models and partnership arrangements.
- 3.12 With regards to income, the model assumes that council tax will be equalised. However, this is contingent upon two key factors, adherence to the council tax referendum principles and particular Alternative Notional Amounts being issued by the Minister and secondly, acceptance by the public. Ultimately, this decision will rest with the newly formed unitary authorities, and the model reflects an assumption rather than a confirmed outcome.
- 3.13 The cost of reorganisation is substantial but there is no certainty that the modelled savings will materialise to the scale required to offset these costs in the short term.
- 3.14 The report is limited to the options being proposed.
- 3.15 The model does not incorporate the potential impact of the Fair Funding Review 2.0 and Business Rates Reset, nor does it account for existing budget gaps within individual authorities' Medium-Term Financial Strategies. These financial pressures will persist regardless of reorganisation and are not addressed within the scope of the options appraisal.
- 3.16 The Council allocated funding of £100,000 for LGR in 2025/26 to cover the costs of the LGR posts created in the year, a further £100,000 is proposed within the assumptions for the 2026/27 draft budget. It is not clear how councils can fund the cash-flow requirements or the extent of any government funding. The majority of costs will occur in the early years of the new unitaries with the expectation that future savings can be delivered.
- 3.17 The long-term financial viability of LGR and new unitaries remains questionable fiscal devolution.

4.0 Alternative Options Considered and Rejected

- 4.1 It was agreed by Council at the Extraordinary meeting on 17 September 2025 that Swale Borough Council remains part of the Kent Programme working with KPMG to produce full business cases for model 3a and 4b, rather than develop our own business case for an alternative option. Given the 28 November 2025 deadline for the submission of our preferred model to MHCLG, there would not be time for a further model to be properly explored and agreed.
- 4.2 To not submit a recommended proposal – there is an option to not submit a preferred proposal. However, this would not stop LGR taking place and Government consulting and then agreeing on which model to implement. This option is not recommended as the views of Swale would not be considered as part of the Secretary of States deliberations.

5.0 Consultation Undertaken or Proposed

- 5.1 There was no statutory requirement on the Council to consult residents affected by a proposed reorganisation (see legal section). However, the Secretary of State's invitation and guidance stated that it is for councils to decide how best to engage locally and in a meaningful and constructive way.
- 5.2 Public and stakeholder engagement on Local Government Reorganisation took place between Tuesday 9 September 2025 and Friday 10 October 2025. The exercise was run by Canterbury City Council on behalf of Kent County Council, Medway Council and the 12 district and borough councils. A detailed report can be found on the Kent Leaders' website. The information does not in itself lead to a conclusion on a preferred option but rather informs the narrative for various assessment criteria, design considerations for future councils and risks through the lens of the public's expectations of new councils
- 5.2 A total of **2,107 responses** were received from the public. The feedback tells us about what the public care about most with respect to LGR, opportunities, their concerns and what matters less. The pattern is consistent across the geography of Kent.
- 5.3 The top priorities are identified as:
1. Quality of services delivered
 2. Speed of problem resolution
 3. Fair and stable council tax
 4. Efficiency and value for money
 5. Ability to influence decisions locally
 6. Being able to contact their councillor
- 5.4 There are some subtle differences in terms of age groups. All age groups ranked service quality as their top priority; the differences between the ranking of the top factors are minimal. Service quality is a priority for people considering themselves

to have a disability or a long-term health condition; they also put a strong emphasis on influencing decisions.

5.5 Factors of secondary importance were a sense of belonging, area size and the ratio of residents to councillor, the ability to visit a council office population size, residents in each ward

5.6 The factors considered less important included number of councillors and attendance at council meetings

5.7 Opportunities identified by respondents' comments have been grouped to reflect the main sentiments expressed in each response. The most frequently raised themes were as set out below:

- Service standardisation and accessibility – clearer responsibilities, easier navigation.
- Economies of scale – reduce duplication and bureaucracy, improve value for money.
- Resident-focused governance – local accountability, inclusive culture.
- Keeping council tax fair and stable – harmonisation across areas.
- Enhanced services – planning, infrastructure, education, and care.
- Optimism for transformation – positive change through a fresh perspective.

5.8 The public's key concerns are:

- Loss of local connection – fear of remote, impersonal councils.
- Disruption and cost of transition – risk of service delays and financial strain.
- Scepticism as to whether the promised efficiencies would outweigh the significant costs of restructuring.
- Reduced accountability – worry about democratic erosion.
- Service quality deterioration – stretched budgets, loss of expertise.
- Debt sharing – concern over subsidising less efficient councils.

5.9 Crucially, the approach to public and stakeholder engagement was not aimed at gauging support for specific options, but rather at exploring the potential benefits and opportunities, alongside any concerns or challenges associated with the proposals. This enabled Councils to take a well-informed and thoughtful approach in addressing these factors within the proposals.

5.10 Stakeholder and Partner engagement has been ongoing since February 2025 for the Interim Submission in March 2025. The engagement has sought to understand:

- What are the key factors that should be taken into account for reorganisation
- What opportunities could be realised by reorganisation
- What problems could be fixed by reorganisation
- What problems could be created or will not be fixed by reorganisation

- 5.11 Kent Councils recognised the importance of close collaboration with their partners and the opportunities for Public Sector Reform. Therefore, Workshops were also undertaken with key strategic partners (including Health, Police, Education, DWP). These workshops explored the options being considered, and having an open discussion on: Challenges in the current system and ways of working; strengths in current ways of working to be protected and/or built upon; opportunities that LGR brings to improve ways of working
- 5.12 Swale Borough Council also ran its own engagement session with key partners and the voluntary, community and social enterprise sector. This focused around similar questions as outlined in 5.4. Key feedback included:
- Concern re loss of identity and local knowledge and therefore a need for resident and VCSE involvement in shaping future services;
 - Opportunities include knowledge sharing, resource sharing and reduced duplication of services.
- 5.13 Swale Borough Council also ran its own workshop with Members during October 25. Key feedback included:
- Concern about councillor numbers in proposed models and reduced democratic accountability; along with the skills and time required for new councillors of a unitary.
 - Recognition that LGR will reduce impact on duplication, accountability and confusion around service delivery for residents
 - That there will be an opportunity to deliver services differently and to address issues that affect our place, without complication of two tiers
 - Opportunity for improved communication with partners and other key stakeholders at both a local and regional level.
 - Opportunity and challenges linked to educational boundaries and how current issues can be addressed.
 - Opportunity for more coherent and joined up strategic priorities across a new unitary
 - Collaboration and transformation of services would be easier.
- 5.14 Swale Borough Council also ran its own workshop with parish and town councils in November 25. Key feedback included:
- New unitary councils will give a 'one stop shop' for residents and enable them to have a better understanding of services.
 - Overall concern that more localised services will fall to parish/town councils and how they will support this without further funding e.g. councillor numbers and skills.
 - Opportunity to engage parish and town councils in implementation to ensure bring communities along with the process.
 - Opportunity for parish/town councils to support each other and increase working together.

6.0 Implications

Issue	Implications
Corporate Plan	Local Government Reorganisation is not currently part of the corporate plan, however it is a key piece of work which is critical to the future of services in Swale
Staffing	The intent set out in the White Paper has profound implications for staffing. If the proposals are implemented, Swale Borough council will cease to exist as an entity with the Council's functions being subsumed into a new, larger successor unitary authority and staff from a variety of councils being TUPE transferred to the successor authority. Every effort is being made to engage and inform staff about developments with regards to the LGR process – including seeking feedback on sentiment and support needed. The uncertainty associated with the current lack of clarity about the future and the subsequent implementation of change has had and will continue to have impact for our staff with risk to the wellbeing of individuals and for service delivery. Proposals will be brought forward for additional investment in training, development and wellbeing support in the budget proposals for 2026/7 and 2027/8. There is also potential to impact on the recruitment and retention of staff and we will do all that we can to manage this. We recognise that as the process unfolds there will need to be dedicated workstreams introduced as part of any programme and project management arrangements to manage the impact for our staff. Development of LGR options and business cases, in collaboration with other Kent authorities, has been achieved by prioritising the work required; this has been complemented by Kent Councils' strategic partner KPMG.
Financial, Resource and Property	Financial implications are discussed within the main body of the report.
Legal, Statutory and Procurement	The Secretary of State has invited (Letter from MHCLG) the Leaders of all fourteen councils in Kent and Medway to submit proposals for a single tier of local government under Part 1 of the Local Government and Public Involvement in Health Act 2007 ('the 2007 Act').

	Once proposals have been received, the Secretary of State will consider them and undertake the statutory public consultation on the proposals in 2026. There is no requirement to consult on every proposal received. Following consultation, if the Secretary of State decides to proceed with one of the reorganisation proposals (with or without modifications), then a detailed Structural Change Order dealing with the transfers of powers, property, assets, and staff, as well as any boundary and electoral changes necessary to give effect to the reorganisation will need to be laid in Parliament. This will also set out a timescale for implementation of the new structures and sets out interim arrangements. Whilst many of the specific obligations regarding a particular reorganisation are derived from the primary Statutory Instrument passed under Section 7 of the 2007 Act, the Secretary of State has also passed a series of more generic regulations applicable to all reorganisation under Section 17 of that Act. These cover the common practical issues that arise when implementing a reorganisation including finance requirements, the transfer of assets and employees and other necessary transitional arrangements. Section 16 of the act provides for agreements between successor authorities. Members should note that they are not obligated to submit a proposal.
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	There is no direct Health and Wellbeing impact of this proposal
Safeguarding of Children, Young People and Vulnerable Adults	There are no direct safeguarding implications of this proposal
Risk Management and Health and Safety	If a local authority decides to not provide a submission to government by 28 November, the Minister will still take a decision on their preference for local government reorganisation, however this will not factor in detailed local knowledge and understanding of the area alongside its strategic opportunities and challenges.

	There is a risk that a decision from the Minister on the chosen option and geography will be delayed and this will have subsequent impacts on the timeline for work to be completed in Phases 3 and 4. This can be mitigated by ensuring regular communication between MHCLG, Local Authority Chiefs, Kent Council Leaders, and planning timelines for completion of work in Phases 3 and 4 which includes some contingencies for delays. Risk management processes will be adopted throughout the LGR timeline, and ensure that implementation and transition risks are logged, managed and appropriately overseen.
Equality and Diversity	An Equality Impact Assessment (EqIA) has been undertaken for local authorities in Kent and Medway responding to the Government's statutory invitation to submit proposals for LGR (see Appendix 7). This EqIA has been developed to assess the potential general implications of LGR and is not option specific. A more detailed and specific EqIA will be required once the government announces the final configuration of unitary councils across Kent and Medway. LGR offers a strategic opportunity to improve public services and outcomes for all communities, including those with protected characteristics. By enabling more integrated and efficient service delivery, enhancing accountability, and promoting inclusive governance, LGR supports a whole-system approach that strengthens collaboration across council services and external partners. It facilitates place-based planning, digital transformation, and the use of data to inform equitable service design. New unitary councils will aim to preserve local identity while embedding community voices, especially underrepresented groups, into decision-making. Aggregating services across areas such as housing, education, and employment allows for more holistic responses to diverse needs, while improved accessibility and the sharing of best practice promote innovation and continuous improvement. The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy proposals, service restructures, or operational changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation. It should also be noted that the decision to implement LGR has been taken by the Minister of State for Local Government and English Devolution, who will also make the decision on the

	geographies for the new Unitary Councils. Whilst it is appropriate that equalities impacts are considered by local authorities in implementing these decisions, the decision on the geographies for the new Unitary Councils lies with the Minister of State.
Privacy and Data Protection	There are no direct privacy or data protection implications of this proposal

7 Appendices

- Appendix 1: Appendix 1: Business Case Executive Summary – Option 3a
- Appendix 2: Business Case Executive Summary – Option 4b
- Appendix 3: Maps detailing geography options.
- Appendix 4: Business Case Executive Summary – Option 1a
- Appendix 5: Business Case Executive Summary – Option 4d
- Appendix 6: Business Case Executive Summary – Option 5
- Appendix 7: Equality Impact Assessment

8 Background Papers

- Full Business Cases are available at [Councils Reveal Draft Business Cases for New Councils - Kent Council Leaders](#)

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Executive summary

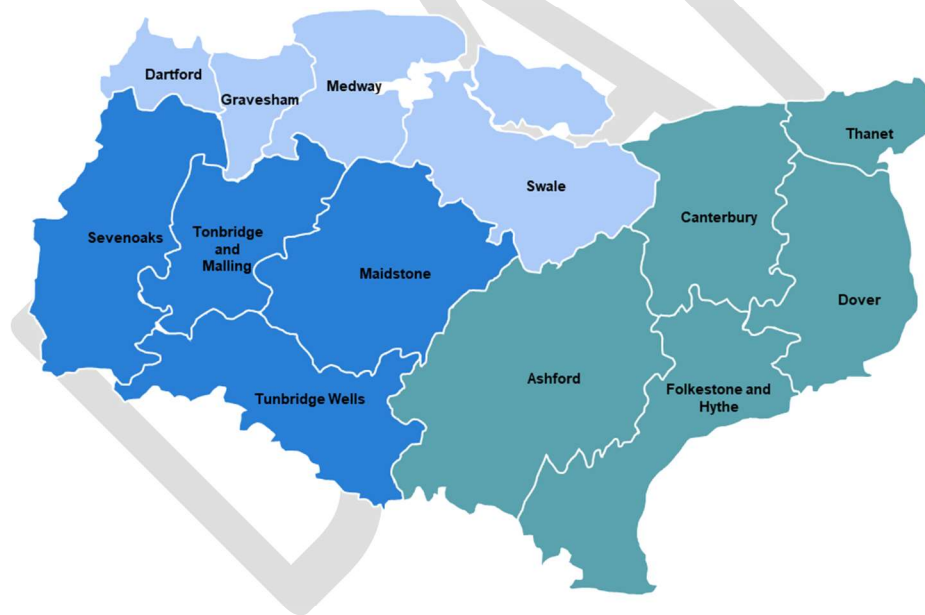
Introducing Option 3A

Supported by **[Councils to be inserted]**, the Option 3A business case sets out a three-unitary model for the Local Government Reorganisation of Kent & Medway.

Option 3A meets each of the Government's criteria for reorganisation, and in doing so, has the greatest savings potential, lowest one-off implementation costs and shortest estimated payback period. It allows for strong local accountability and ensures services reflect community needs, whilst achieving economies of scale and supporting fiscal stability.

The 3A model offers broadly balanced populations which align to local identities and creates unitary councils with the capacity to deliver and meet the needs of changing populations.

This model has alignment and support from the county's largest public sector partners, strengthening opportunities for place-based service development alongside social and health care integration and transformation, and wider public service reform. The model will allow for pan-Kent service provision and limit the costs of other public sector partners by reducing their requirement to realign, and forms a strong basis for future devolution.



"From the point of view of how policing is organised in Kent, I believe that if local government re-organisation is required, it should be with three unitary authorities, built on the existing District council boundaries and Kent Police's Divisional structure."

Kent Police and Crime Commissioner

	North Kent	West Kent	East Kent
Population	686,716	567,062	677,906
Current council areas	• Dartford • Gravesham • Medway • Swale	• Maidstone • Sevenoaks • Tonbridge & Malling • Tunbridge Wells	• Ashford • Canterbury • Dover • Folkestone & Hythe • Thanet
	A strategically important logistics and infrastructure hub, North Kent will drive economic growth through its proximity to London, major transport corridors (M25, M2), and international gateways like Ebbsfleet and the Port of Sheerness. It will focus on clean growth, advanced manufacturing, and professional services, with a diverse population and strong urban regeneration potential.	A knowledge-driven region with a high-quality environment that is well placed to leverage its skilled workforce, heritage assets, and green infrastructure to attract investment in life sciences, creative industries, and professional services. It shares a strong sense of identity, economic, social, and transport links, making it a coherent unit for governance while preserving local representation.	A diverse coastal and rural economy anchored by major ports and education hubs, East Kent will be the Gateway to Europe. It will focus on regeneration, tourism, creative industries, and green energy, supported by high-speed rail and strategic transport links. The area's rich heritage and cultural assets will underpin place-based growth.

Purpose and approach (see section 1)

The reorganisation of local government presents a valuable opportunity to redesign a system that better serves the diverse needs of Kent and Medway's residents.

The 14 councils of Kent have collaborated to develop a model reflecting established population and economic centres as well as community and workplace patterns.

Through this joint effort, the councils have developed five business cases addressing the government's six reform criteria, proposing to replace the current two-tier system with more efficient and resilient unitary authorities.

These authorities aim to support devolution, enhance service delivery and strengthen community engagement.

Each proposal is underpinned by a shared evidence base, robust governance, transparent appraisal and extensive stakeholder and public consultation to form a united and evidence-led vision for the future of local government in Kent and Medway.

Of the five options considered, Option 3A is being put forward as the preferred proposal in this case.

	Option 1a	Option 3a	Option 4b	Option 4d	Option 5a
					
Approach to drafting	Kent County Council leading with some shared input around finance and services.	Common approach to drafting with input from councils.			
Structure, formatting and branding	Separate structure, formatting and branding.	Single approach to structure, formatting and branding across four business cases. A significant proportion of content across the four cases will be shared and clearly highlighted within the cases.			

The Kent context (see section 2)

Kent, located in the south east of England, is a geographically diverse and economically important area.

Known as the Garden of England and the UK's Gateway to Europe, it covers 3,739 sq. km with a population of about 1.93 million.

The county combines densely populated urban centres with extensive rural areas.

Its landscape includes the North Downs, The Weald, and a long coastline featuring the White Cliffs of Dover. Rivers like the Thames, Medway and Stour support trade and settlement.

Economically, Kent has evolved from its agricultural roots into a modern, mixed economy encompassing manufacturing, logistics, life sciences, tourism and digital industries.

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Major assets include the Port of Dover, the Discovery Park science and technology hub and excellent transport links.

Kent's strategic location, skilled workforce and innovation hubs drive regional growth and support its case for devolution and local government reform.

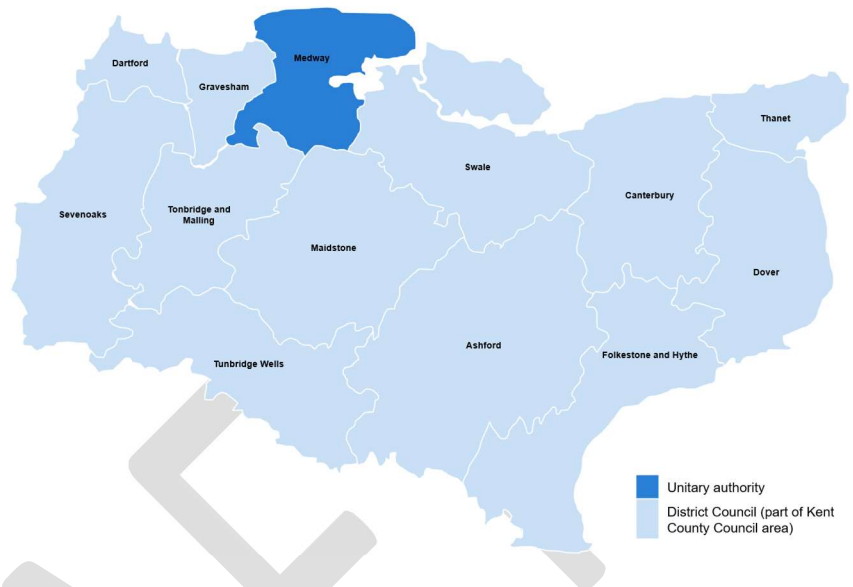
Kent currently has a two-tier local government system.

At the upper tier is Kent County Council, while the lower tier consists of 12 district and borough councils.

Medway Council functions separately as a unitary authority.

In addition, there are more than 300 town and parish councils handling local-level services.

The current mixed model of service delivery creates complexity and all 14 councils recognise the potential benefits of moving towards a single-tier system with fewer organisations and a more unified governance structure.



Challenges and opportunities (see section 3)

Councils across the county face financial pressures and rising demand.

In Kent, key pressures include:

- uneven funding and tax bases
- escalating social care and border-related costs
- workforce shortages and morale issues
- fragmented governance across the two-tier system

Local Government Reorganisation (LGR) offers a unique opportunity to create a more efficient, resilient and sustainable model.

By simplifying structures and pursuing devolution, Kent can streamline service delivery, strengthen financial stability, enhance collaboration across sectors, attract investment and build a greater sense of place to ensure more cohesive, accountable and community focused local government services.

Vision and principles for Local Government Reorganisation (see section 4)

Our vision for local government in Kent is:

Better outcomes for Kent residents through financially-sustainable and accountable local public services delivered in partnership with communities.

LGR is the catalyst for transformation and reform, creating resilient, digitally-enabled councils rooted in local identity and strong partnerships.

It is crucial that devolution and LGR are linked: structural reform unlocks the powers, funding and flexibility needed to make decisions locally and drive growth.

Kent's ambition is to deliver better outcomes for all residents through sustainable, accountable and community-focused public services.

All councils in Kent are united in their support for devolving powers to a single strategic authority.

This will ensure decisions about Kent are made in Kent, by those who know its communities best.

LGR and devolution are intrinsically linked. To fully realise our vision, we need the powers, funding and countywide collaboration that only a devolution deal and a new strategic Kent authority can provide.

We are committed to securing a devolution deal for Kent at the earliest possible opportunity.

Option 3A creates three strong councils and strikes the right balance between resilience, financial stability, efficiency and local connection. Guided by shared principles of resident focus, collaboration, digital innovation, and strong leadership, this proposal sets out a clear framework for a more responsive, cohesive, and future-ready system.

The case for Option 3A (see section 5)

Option 3A delivers balanced populations whilst respecting existing borough and district boundaries. It delivers strong alignment to transport networks, travel-to-work areas, local identity and public service geographies. The proposed unitary councils have the scale to ensure efficient coordination, improve capacity and withstand financial shocks, ensuring sustainable service delivery across provision.

The model aligns closely with health, police and fire service boundaries, reducing fragmentation and improving opportunities for co-ordination, integration and collaboration for system wide transformation. It is supported by major public service partners both for the benefits to day-to-day operational co-ordination and the potential to further develop and reinforce partnership, place-based working and longer-term integration, shared funding and transformational change. It preserves local identity while strengthening governance and resilience and lays the foundation for devolution and public sector reform.

Option 3A creates a simplified, efficient and community-focussed single tier structure, capable of delivering sustainable services and economic growth, driving up living standards and enabling good health creation. It is the most efficient and least disruptive option for Kent, with lower transition costs, and a shorter payback period than other multi unitary options, while meeting population requirements of government.

Three unitary councils creates financially sustainable and democratically accountable authorities, with sufficient scale to provide core services and the flexibility to meet the needs of the local population.

Summarised below are the key arguments for why Option 3A is best for Kent.

Key theme	Arguments	Government Criteria
Financial viability and balanced growth	• Scale supports economic resilience, including the ability to absorb shocks in high-pressure services i.e. demand for social care. • Balances tax bases and supports fair council tax harmonisation for long-term financial stability. • Larger councils (567k–687k residents) deliver the optimal scale for resilience and efficiency. • Consolidation from fourteen councils to three removes duplication, simplifies governance, and maximises savings. • Three proposed councils have broadly balanced economic strength, tax bases, and Gross Value Added (GVA) per capita, supporting sustainable growth and resilience. • Economies of scale in procurement, staffing, IT, HR, and infrastructure reduce duplication. • Transformation and digital investment enabled by scale and capacity. • Simplified governance improves financial oversight and transparency, reducing risk of inefficiency. • Simplified structures support strong partnership across unitary areas to collaborate on strategic issues, enabling service delivery on a pan-Kent basis. • Avoids boundary changes, limiting disruption and extra cost, time and risk. • Strong fiscal starting positions and balanced populations ensure capacity to manage pressures and withstand shocks. • Offers the best value for money, with the highest savings, lowest transition costs, and quickest payback period.	Criteria 1, 2, 3
Local identity and community cohesion	• Proposed boundaries align with historic, cultural, and service geographies, preserving local identity and social cohesion across North, West and East Kent. • Recognisable community ties are maintained (e.g. Cinque Ports, coastal towns, market towns) supporting continuation of local traditions, civic institutions, and community networks. • Alignment with 'Travel to Work' areas supporting coherent economic geographies for housing, infrastructure, study patterns and labour markets. • Enables coordinated housing, transport, and infrastructure planning at a meaningful scale, with critical UK port of entry points contained within one council able to support communities effectively when disruption occurs.	Criteria 1, 3, 4, 6
Population, governance and democratic accountability	• Population densities vary logically (urban vs rural), allowing tailored service priorities (e.g. urban regeneration vs green infrastructure). • Streamlined governance structure strengthens ability to engage effectively at an appropriate scale with central government and regional bodies.	Criteria 1, 2, 3

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- Broadly balanced populations across unitary areas.
- Councillor-to-electors ratios in line with ratios seen nationally through recent LGR programmes ensuring democratic accountability.
- Well-developed governance arrangements and effective structural and policy measures that enhance neighbourhood and community engagement.
- Ensures councillors and residents have meaningful influence over local services and priorities.

Better, More Integrated Public Services

- Aligns boundaries with NHS, Police, transport, and travel to work / study areas to improve coordination and consistency.
- Existing partnerships and shared services enhance capacity and reduce fragmentation, supporting public service reform. Services disrupted by LGR will be actively managed and adapted to maintain continuity and effectiveness.
- Scale, capacity and alignment of place-based and people services to deliver prevention and complex reforms in social care.
- Larger, strategically aligned councils can plan and deliver jointly on community safety, health, housing, and care.
- Enhances data sharing, specialist capacity, and system-wide collaboration to tackle shared challenges across unitary areas.
- Unites Dover, Folkestone and Ashford to provide for coherent oversight of the county's strategic road and rail entry ports.

Criteria 1, 3, 4

Platform for Devolution, Strategic Growth and Regional Priorities

- Balanced unitary authorities meet the population scale for effective devolution and efficient delivery.
- Supports fair representation and joint decision-making within a future Mayoral Strategic Authority.
- Provides sufficiently sized areas for strategic planning to meet priorities including housing targets, economic growth and supporting integration with preventative and integrated care.

Criteria 5

Implementation plan (see section 6)

Kent's LGR implementation plan aims to follow a phased and collaborative approach across all councils, leveraging a well-established shared programme with strong governance and joint planning.

The process is structured into preparation, foundational, shadow authority, officer leadership and go-live phases, each with clear priorities to ensure a smooth transition while driving ambitious public service reform alongside devolution.

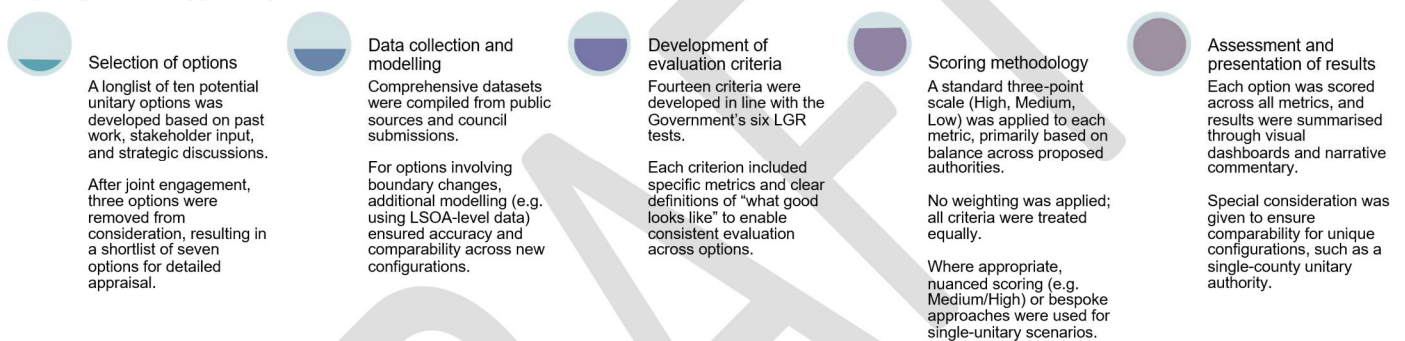
The programme builds on Kent's history of joint working and lessons from previous LGR efforts, supported by targeted governance, workstreams and stakeholder engagement to mitigate risks related to service disaggregation, aggregation, ICT and working together, aiming for a seamless, efficient transition that benefits residents and public services over the long-term.

Options appraisal (see Appendix 1)

A rigorous and collaborative process undertaken by the 14 Kent local authorities to appraise potential council governance options. The aim was to provide a robust, consistent, and evidence-based foundation to support local decision-making on which options should advance to full business case development.

The appraisal followed national guidance and was aligned with the Government's six criteria for local government reorganisation, as set out in correspondence from the Secretary of State in February and June 2025. Importantly, the process did not rank or recommend any preferred option but provided a shared evidence base to inform council decisions.

Key stages of the appraisal process:



Council Leaders reviewed the appraisal findings, supported by resident and stakeholder views. While the appraisal did not determine a preferred option, it served as an objective and structured basis for informed political judgement and democratic decision-making on which options should proceed to business case development.

Financial modelling (see Appendix 2)

Finance officers across all 14 Kent councils have reviewed and adjusted the financial modelling in order to provide a single financial assessment of models for inclusion in proposals to government.

The key driver of difference between options are the number of councils being proposed.

Due to the assumptions applied within the modelling, implementation costs and recurring costs of disaggregation increase as the number of councils proposed increases.

The headline numbers for Option 3A are set out below:

LGR option	Implementation costs (one-off) (£m)	Reorganisation savings (gross) (£m)	Disaggregation costs (£m)*	Recurring annual revenue savings (£m)**	Estimated payback period
Option 3A	(127.8)	69.4	(19.7) - (29.2)	40.2 - 49.7	5.4 – 6.7 years

**A range has been applied specifically for disaggregation costs following collaborative discussions around different scenarios for the impact of LGR on commissioned spend across adult and children's social care.*

***Recurring revenue savings = gross reorganisation savings less disaggregation costs*

The three-unitary option is the proposal which offers best value, with the highest savings, lowest transition costs, and quickest payback period. This model supports larger taxbases and, in line with the financial modelling, requires lower disaggregation and transition costs while offering greater opportunities for economies of scale.

Of all the options being considered, 3A provides the most balanced population distribution, promoting resilience and strategic capacity. Each authority is sized to efficiently deliver services, withstand financial pressures, and invest in transformation, while remaining closely connected to local communities. The model also avoids boundary changes, which would inevitably be associated with increased costs, risk and complexity.

The model is designed to absorb future shocks and manage demand in high-pressure services such as adult social care and children's services and has the potential to support strengthened integration and partnership working across public sector services developing innovative and coordinated responses to areas such as homelessness.

Alignment with partner structures supports public service reform and provides a firm basis for future devolution.

"...our preference would be for the smallest number of unitary councils to minimise infrastructure costs and the risk of fragmenting services."

NHS Kent and Medway

Data sources (see Appendix 3)

A common data set was used for all analyses presented in this case.

Details of the data set including its source, structure and variables, are provided in Appendix 3.

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Executive summary

Introducing Option 4B

Supported by the district and borough councils of **[Councils to be inserted]**, the Option 4B business case sets out a four-unitary model that balances local identity with strategic capacity.



	North Kent	West Kent	Mid Kent	East Kent
Population	528,337	567,062	411,746	424,559
Current council areas	- Dartford - Gravesham - Medway	- Maidstone - Sevenoaks - Tonbridge & Malling - Tunbridge Wells	- Swale - Ashford - Folkestone & Hythe	- Canterbury - Dover - Thanet
	North Kent is a nationally significant growth area within the Thames Estuary corridor. It hosts major infrastructure assets including the Dartford Crossing, Ebbsfleet International Station, and the planned Lower Thames Crossing, supporting high commuter flows, logistics, and cross-regional connectivity. Key urban centres like Medway (Kent's	West Kent combines a high-quality natural environment with excellent connectivity and a skilled workforce. It is a hub for professional services, life sciences, and creative industries. Districts such as Sevenoaks, Tonbridge & Malling, Tunbridge Wells, and Maidstone offer strong residential markets, high levels of knowledge-based	Mid Kent includes Ashford, Swale, and Folkestone & Hythe, areas combining fast-growing urban centres with rural and coastal assets. Ashford benefits from high-speed rail and international connectivity, while Swale's Port of Sheerness plays a vital logistics role. Folkestone & Hythe leverages its coastal position and Eurotunnel access	East Kent is defined by its international gateways, strong cultural heritage, and growing sectors in health, life sciences, and the creative economy. Canterbury leads as an education and cultural centre, while Dover and Ramsgate support major trade and port activity. Thanet and surrounding coastal towns offer regeneration

largest urban area), employment, and for economic growth. potential and tourism Dartford, and vibrant town centres. appeal, supported by Gravesham are The area's green well-suited for lower land values driving growth in infrastructure and infrastructure-led and strategic housing, commercial heritage assets development, transport links, development, and make it attractive for renewable energy, including High Speed sectors such as investment and and resilience- 1. creative industries, lifestyle-focused focused investment. engineering, and development.

The area is well-positioned for clean growth, benefitting from strong transport infrastructure and strategic proximity to London and Europe.

Purpose and approach (see section 1)

The reorganisation of local government presents a valuable opportunity to redesign a system that better serves the diverse needs of Kent and Medway's residents.

The 14 councils of Kent have collaborated to develop a model reflecting established population and economic centres as well as community and workplace patterns.

Through this joint effort, the councils have developed five business cases addressing the government's six reform criteria, proposing to replace the current two-tier system with more efficient and resilient unitary authorities.

These authorities aim to support devolution, enhance service delivery and strengthen community engagement.

Each proposal is underpinned by a shared evidence base, robust governance, transparent appraisal and extensive stakeholder and public consultation to form a united and evidence-led vision for the future of local government in Kent and Medway.

	Option 1a	Option 3a	Option 4b	Option 4d	Option 5a
					
Approach to drafting	Kent County Council leading with some shared input around finance and services.	Common approach to drafting with input from councils.			
Structure, formatting and branding	Separate structure, formatting and branding.	Single approach to structure, formatting and branding across four business cases. A significant proportion of content across the four cases will be shared and clearly highlighted within the cases.			

The Kent context (see section 2)

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Kent, located in the south east of England, is a geographically diverse and economically important area.

Known as the Garden of England and the UK's Gateway to Europe, it covers 3,739 sq. km with a population of about 1.93 million.

The county combines densely populated urban centres with extensive rural areas.

Its landscape includes the North Downs, The Weald, and a long coastline featuring the White Cliffs of Dover. Rivers like the Thames, Medway and Stour support trade and settlement.

Economically, Kent has evolved from its agricultural roots into a modern, mixed economy encompassing manufacturing, logistics, life sciences, tourism and digital industries.

Major assets include the Port of Dover, the Discovery Park science and technology hub and excellent transport links.

Kent's strategic location, skilled workforce and innovation hubs drive regional growth and support its case for devolution and local government reform.

Kent currently has a two-tier local government system.

At the upper tier is Kent County Council, while the lower tier consists of 12 district and borough councils.

Medway Council functions separately as a unitary authority.

In addition, there are more than 300 town and parish councils handling local-level services.

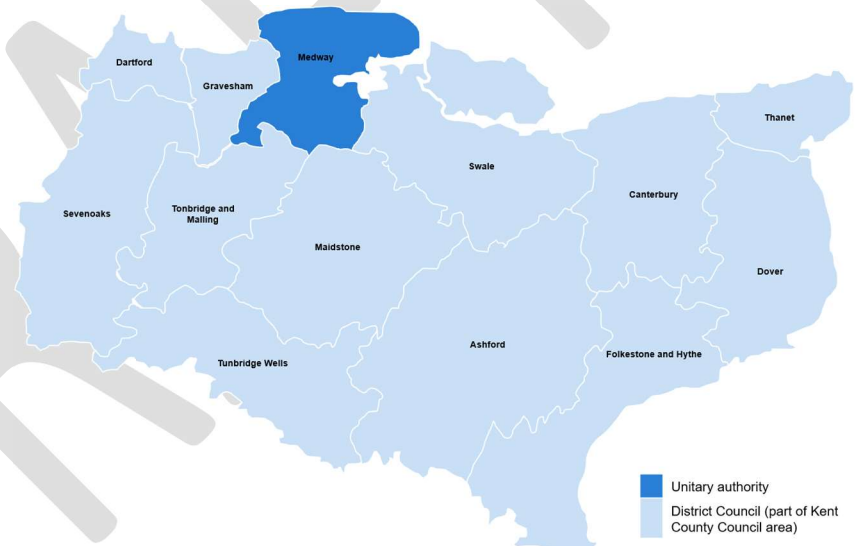
The current mixed model of service delivery creates complexity and all 14 councils recognise the potential benefits of moving towards a single-tier system with fewer organisations and a more unified governance structure.

Challenges and opportunities (see section 3)

Councils across the county face financial pressures and rising demand.

In Kent, key pressures include:

- uneven funding and tax bases
- escalating social care and border-related costs
- workforce shortages and morale issues
- fragmented governance across the two-tier system



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Local Government Reorganisation (LGR) offers a unique opportunity to create a more efficient, resilient and sustainable model.

By simplifying structures and pursuing devolution, Kent can streamline service delivery, strengthen financial stability, enhance collaboration across sectors, attract investment and build a greater sense of place to ensure more cohesive, accountable and community focused local government services.

Vision and principles for Local Government Reorganisation (see section 4)

Our vision for local government in Kent is:

Better outcomes for Kent residents through financially-sustainable and accountable local public services delivered in partnership with communities.

LGR is the catalyst for transformation and reform, creating resilient, digitally-enabled councils rooted in local identity and strong partnerships.

It is crucial that devolution and LGR are linked: structural reform unlocks the powers, funding and flexibility needed to make decisions locally and drive growth.

Kent's ambition is to deliver better outcomes for all residents through sustainable, accountable and community-focused public services.

All councils in Kent are united in their support for devolving powers to a single strategic authority.

This will ensure decisions about Kent are made in Kent, by those who know its communities best.

LGR and devolution are intrinsically linked. To fully realise our vision, we need the powers, funding and countywide collaboration that only a devolution deal and a new strategic Kent authority can provide.

We are committed to securing a devolution deal for Kent at the earliest possible opportunity.

Option 4B offers a future-ready model for Kent's local government, one that combines the scale needed to deliver efficient, resilient services with a deep respect for local identity, community voice and historical continuity.

By creating four strategically-aligned unitary authorities, Option 4B enables transformation across public services, supports financial sustainability through coherent economic geographies and tax bases and unlocks opportunities for Kent-wide collaboration where it adds value.

It reflects the shared ambition of Kent's leaders to build a system that is inclusive, place-sensitive, and capable of delivering better outcomes for residents, while positioning the county to secure devolution powers and drive long-term growth.

The case for Option 4B (see section 5)

Option 4B offers a balanced and locally-responsive model for the future of local government in Kent.

By creating four unitary authorities, this approach ensures structures are:

- large enough to deliver efficient, high-quality public services at scale
- small enough to preserve local identity, reflect historic and cultural geographies, and maintain close connections with the communities they serve

This model is rooted in Kent's economic and demographic realities.

It supports long-term financial sustainability by creating authorities with balanced GVA and tax bases, while enabling strategic collaboration across the county to address shared challenges and unlock future growth.

Key strengths include:

- its alignment with government guidelines by ensuring no single authority is disproportionately large, avoiding scenarios where one unit is nearly double the size of another
- it accommodates planned and projected population growth across the region, with each new authority expected to exceed 500,000 residents during the lifetime of their Local Plans
- it ensures a fair distribution of key economic indicators such as GVA and levels of deprivation, fostering the conditions for sustained economic development in all four authorities
- supports councillor-to-electorate ratios within accepted ranges, enabling strong local governance and effective democratic representation in each area

Summarised below are the key arguments for why the four-unitary model is best for Kent.

Key theme	Arguments	Government Criteria
Economic viability and balanced growth	• Four councils have balanced economic strength, tax bases, and Gross Value Added (GVA) per capita, supporting sustainable growth and resilience. • Each unitary has a recognised economic centre and international ports/airports, providing gateways to trade and economic growth. • Business rates tax bases strong (£70m–£113m retained), enabling financial independence. • Localised economic strategies possible while aligning with wider Kent ambitions. • Council tax bases are sufficient and differences modest, reducing disruption and complexity. • Alignment with Travel to Work Areas supports coherent economic geographies for housing, infrastructure, and labour markets.	Criteria 1, 2, 5
Balanced population and service delivery	• Balanced population sizes (411k–567k) enable economies of scale and resilience in service delivery. • Population densities vary logically (urban vs rural), allowing tailored service priorities (eg, urban regeneration vs green infrastructure). • Balanced deprivation and social care caseloads promote equitable service distribution.	Criteria 1, 2, 3, 6

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	• Model supports localised reform while maintaining efficiency and scale. • Existing partnerships and shared services enhance capacity and reduce fragmentation. • Councillor-to-electorate ratios manageable, with structural/community engagement measures proposed.	
Financial resilience and efficiency	• Healthy financial metrics with balanced reserves, manageable transition costs (£130.9m implementation, payback 10+ years). • Economies of scale in procurement, staffing, IT, HR, and infrastructure reduce duplication. • Simplified governance improves financial oversight and transparency, reducing risk of inefficiency. • Transformation and digital investment enabled by scale and capacity. • Avoids boundary changes, limiting disruption and extra costs. • Invest-to-save principles and joint transition planning minimise financial burden. • Scale supports resilience to absorb shocks in high-pressure services.	Criteria 2, 3, 5
Local identity and community cohesion	• Boundaries align with historic, cultural, and service geographies, preserving local identity and social cohesion. • Recognisable community ties maintained (e.g., coastal towns, market towns). • Supports continuation of local traditions, civic institutions, and community networks. • Collaboration across boundaries remains possible for strategic issues. • Each unitary has a clear identity aligned with Travel to Work Areas and education boundaries.	Criteria 1, 4, 6
Governance and democratic accountability	• Four councils create a more efficient democratic model, reducing duplication and simplifying decision-making. • Balanced councillor-to-electorate ratios enable strong local representation and manageable workloads. • Structural/community engagement measures (parish councils, committees) enhance neighbourhood involvement. • The model supports place-sensitive governance balancing local responsiveness with regional coordination. • Clear leadership and governance frameworks strengthen transparency and accountability.	Criteria 1, 5, 6
Strategic devolution and regional priorities	• Four unitary authorities with proportionate population sizes support equitable representation and strong regional partnerships. • Streamlined governance better positioned for engagement with central government and regional bodies. • Aligns with functional economic areas and transport corridors enhancing coordination. • Supports Kent-wide strategic planning (housing, infrastructure, economic development).	Criteria 5

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Transformation and innovation	• Collective commitment across councils strengthens the governance case for devolution. • Balances opportunity and risk across authorities, ensuring no one authority is overburdened.	
	• Scale and capacity to deliver complex reforms in social care and invest in digital/data-driven services. • Supports integrated service delivery and breaks down silos. • Builds on existing footprints, minimising disruption and fostering collaboration with NHS, Police, and other partners. • Enables flexible, agile responses to emerging challenges. • Shared transition planning accelerates quick wins and coordinated transformation. • Supports joint approaches to prevention and integrated care.	Criteria 2, 3, 6

Implementation plan (see section 6)

Kent's LGR implementation plan aims to follow a phased and collaborative approach across all councils, leveraging a well-established shared programme with strong governance and joint planning.

The process is structured into preparation, foundational, shadow authority, officer leadership and go-live phases, each with clear priorities to ensure a smooth transition while driving ambitious public service reform alongside devolution.

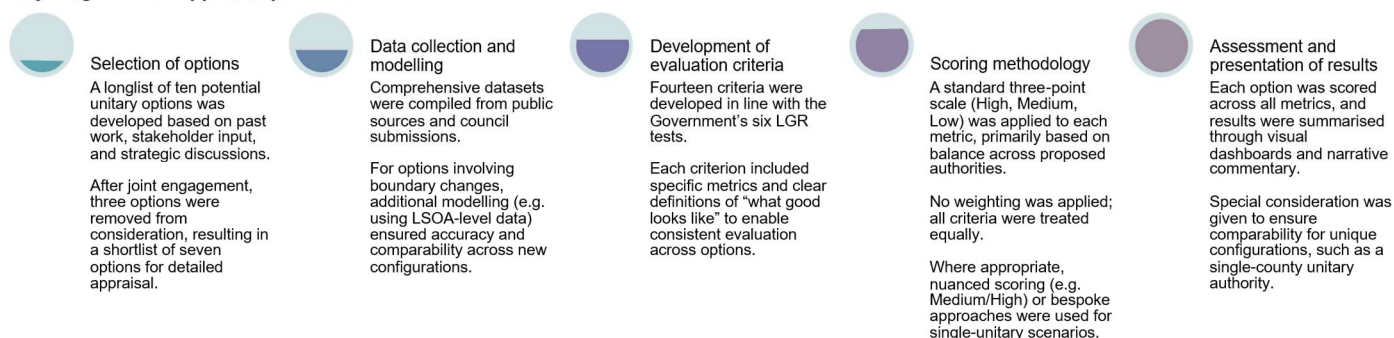
The programme builds on Kent's history of joint working and lessons from previous LGR efforts, supported by targeted governance, workstreams and stakeholder engagement to mitigate risks related to service disaggregation, aggregation, ICT and working together, aiming for a seamless, efficient transition that benefits residents and public services over the long-term.

Options appraisal (see Appendix 1)

A rigorous and collaborative process undertaken by the 14 Kent local authorities to appraise potential council governance options. The aim was to provide a robust, consistent, and evidence-based foundation to support local decision-making on which options should advance to full business case development.

The appraisal followed national guidance and was aligned with the Government's six criteria for local government reorganisation, as set out in correspondence from the Secretary of State in February and June 2025. Importantly, the process did not rank or recommend any preferred option but provided a shared evidence base to inform council decisions.

Key stages of the appraisal process:



Council Leaders reviewed the appraisal findings, supported by resident and stakeholder views. While the appraisal did not determine a preferred option, it served as an objective and structured basis for informed political judgement and democratic decision-making on which options should proceed to business case development.

Financial modelling (see Appendix 2)

Finance officers across all 14 Kent councils have reviewed and adjusted the financial modelling in order to provide a single financial assessment of models for inclusion in proposals to government.

The key driver of difference between options are the number of councils being proposed.

Due to the assumptions applied within the modelling, implementation costs and recurring costs of disaggregation increase as the number of councils proposed increases.

The headline numbers for Option 4B are set out below:

Option	Implementation costs (one-off) (£m)	Reorganisation savings (gross) (£m)	Disaggregation costs (£m)*	Recurring annual revenue savings (£m)**	Estimated payback period
4b	(130.9)	67.5	(32.9) - (48.6)	18.9 – 34.6	7.8 – 14.3 years

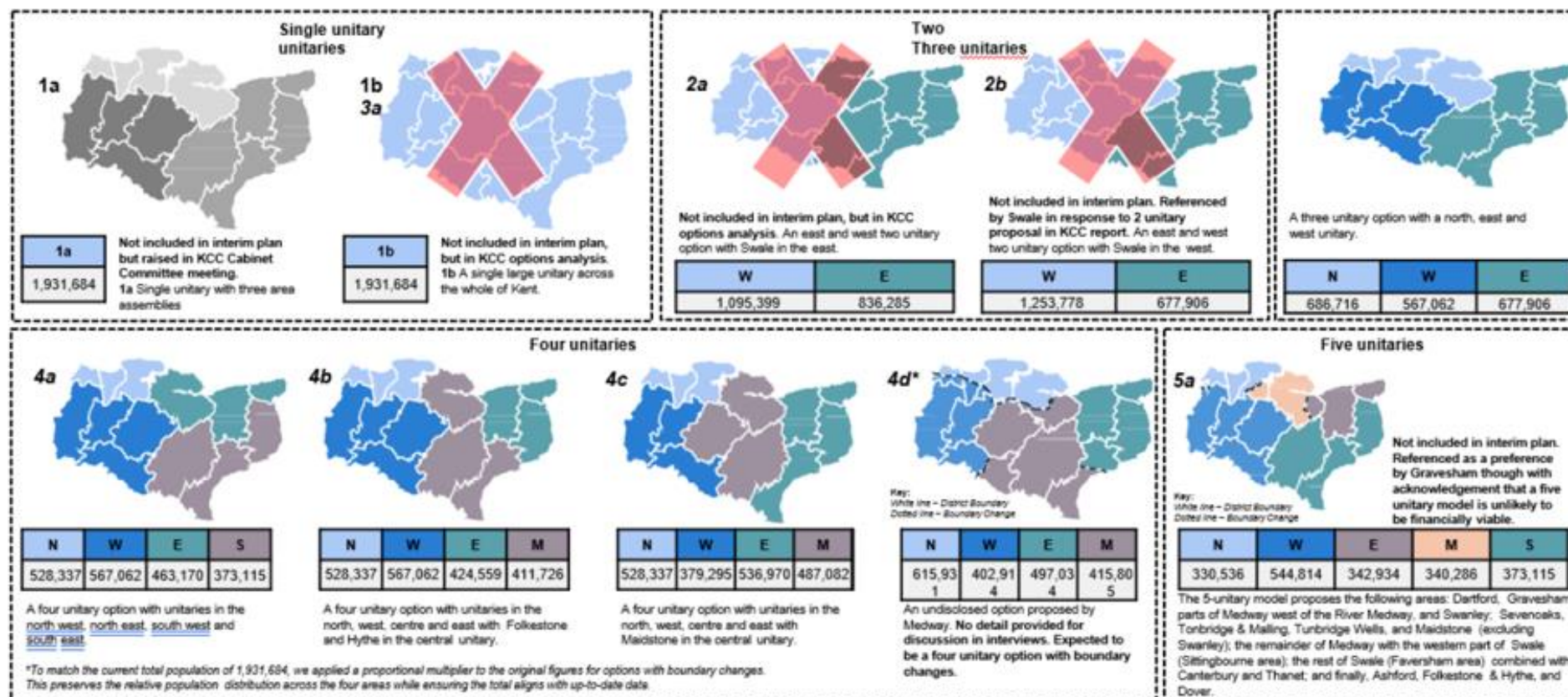
Data sources (see Appendix 3)

A common data set was used for all analyses presented in this case.

Details of the data set including its source, structure and variables, are provided in Appendix 3.

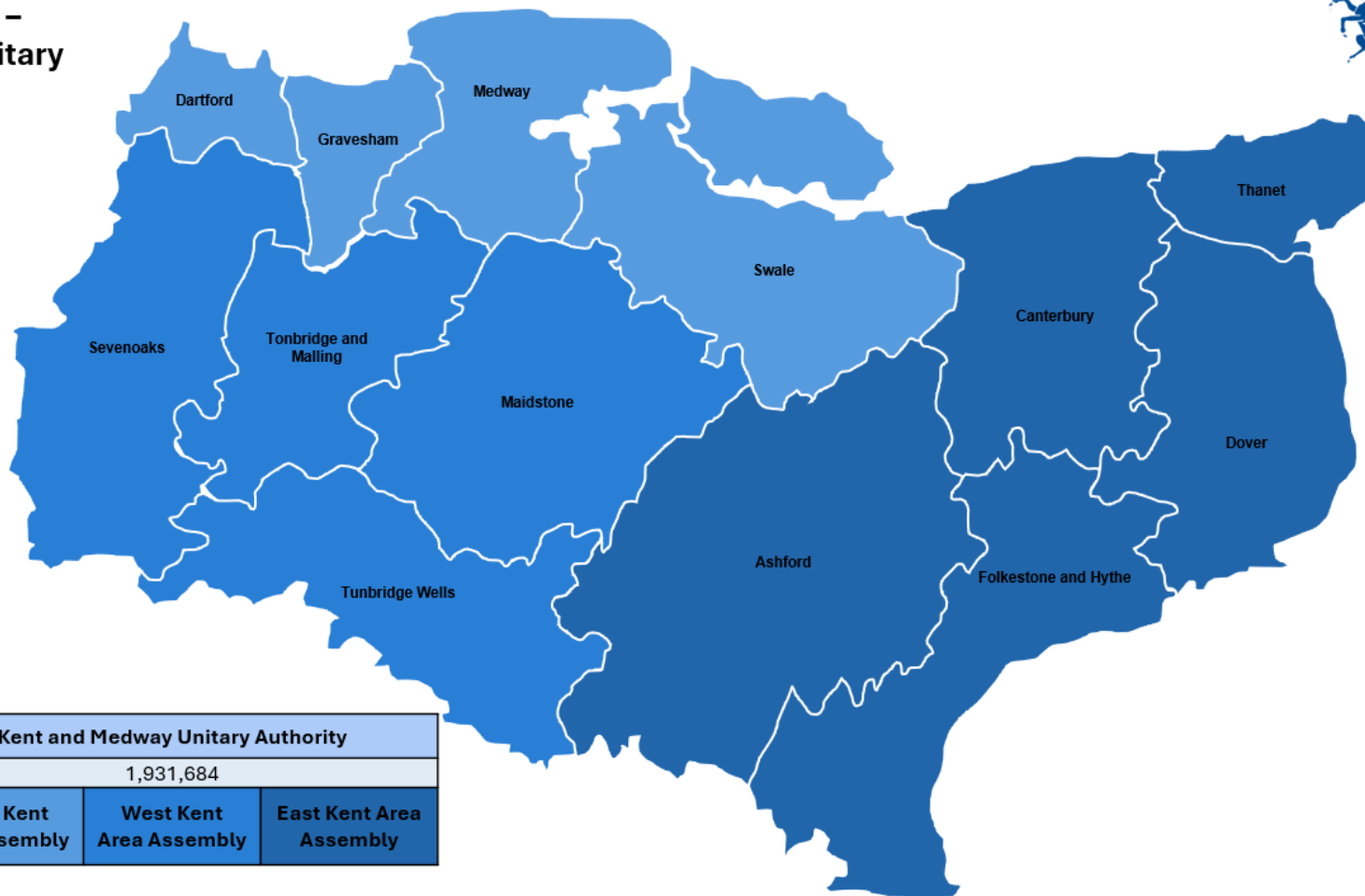
Appendix 3 Maps of Local Government Reorganisation options in Kent

Ten potential options were raised at the start of the options appraisal, but Leaders jointly agreed to rule out three options, with seven remaining in scope for the options appraisal as shown in the graphic below.

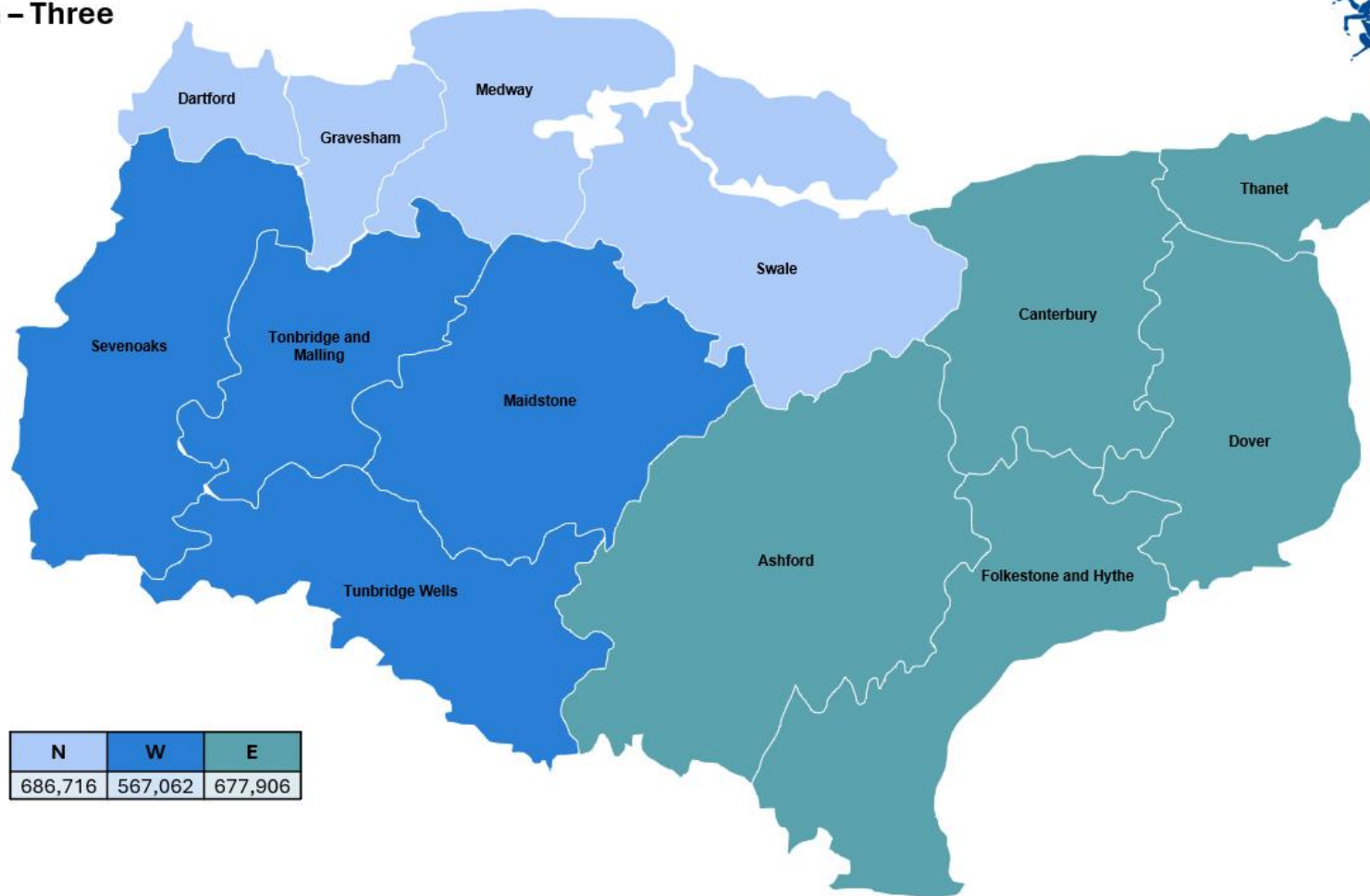


Five options were agreed to take forward for full business case development, a shown on the following pages:

Option 1a – Single Unitary

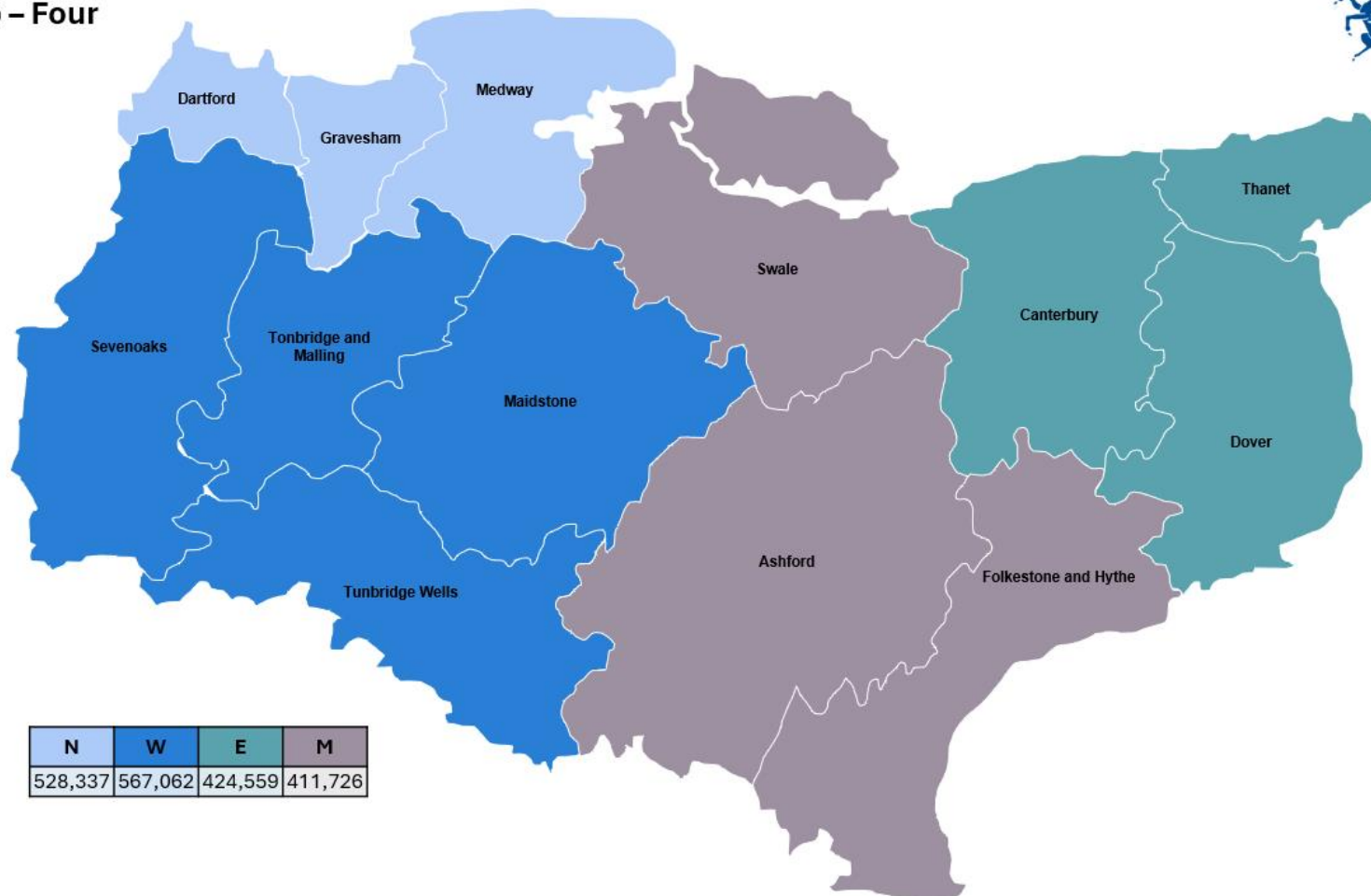


Option 3a – Three Unitaries



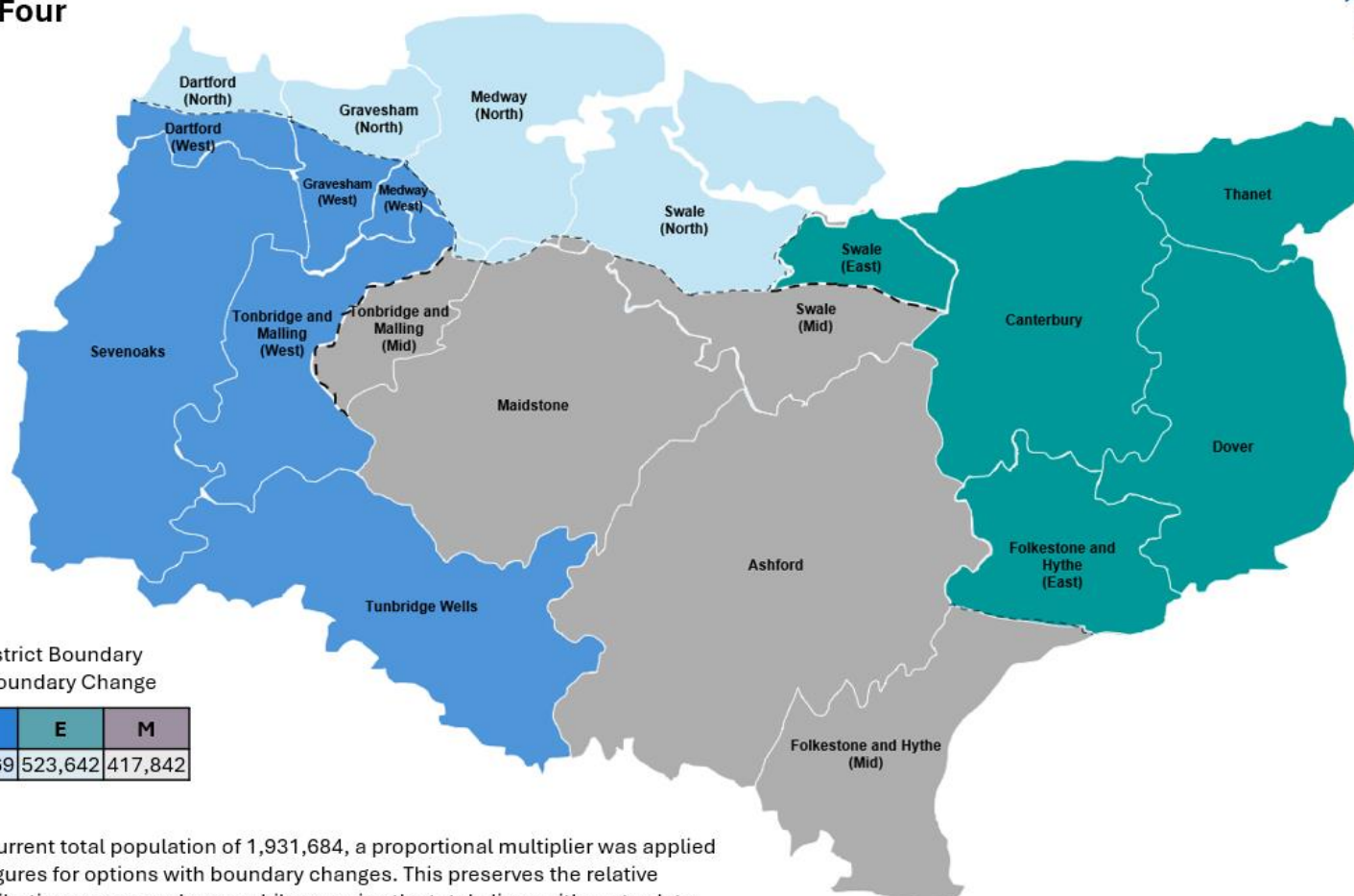
N	W	E
686,716	567,062	677,906

Option 4b – Four Unitaries



N	W	E	M
528,337	567,062	424,559	411,726

Option 4d – Four Unitaries*



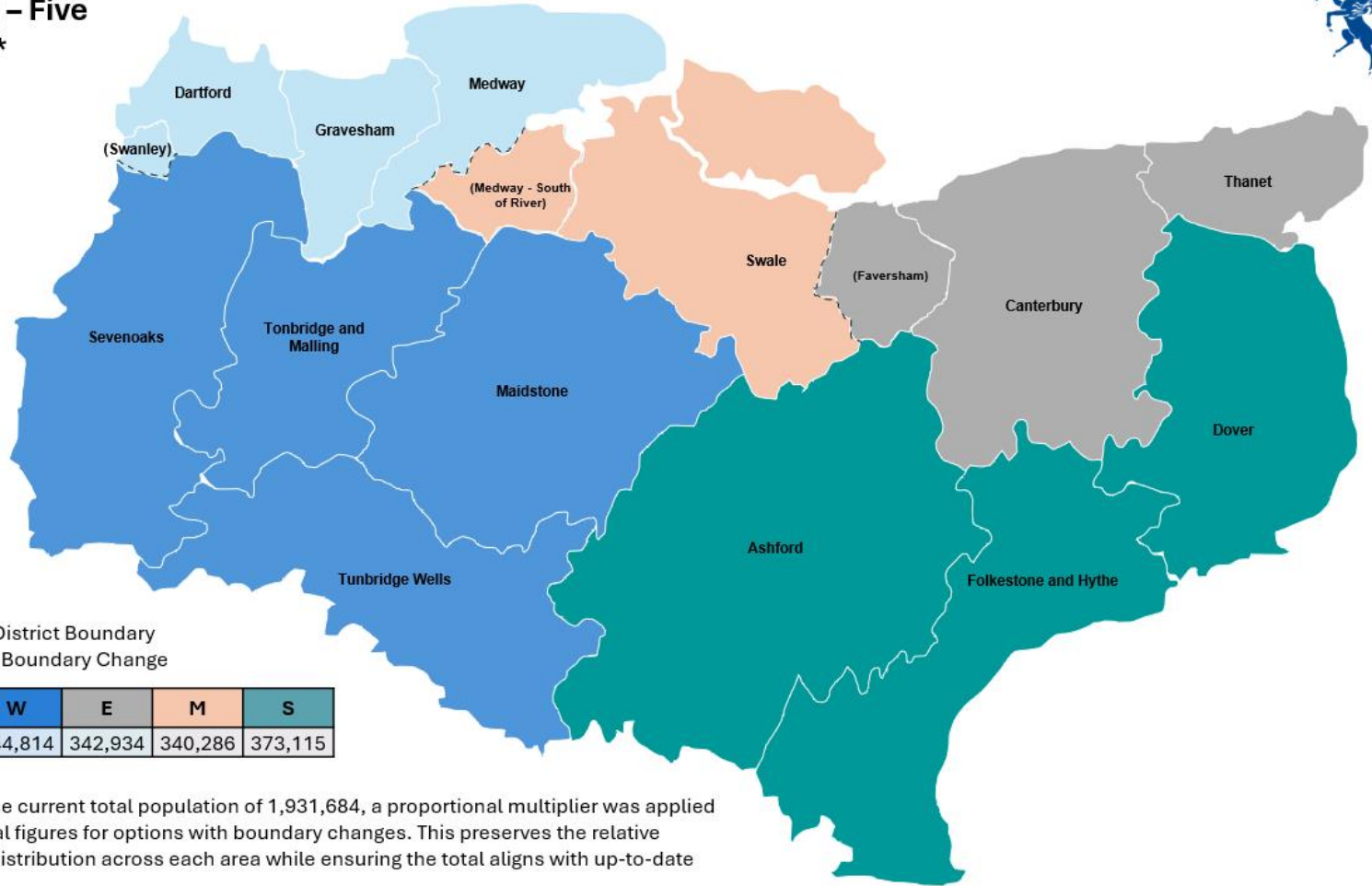
Key

White line – District Boundary
Dotted line – Boundary Change

N	W	E	M
615,931	374,269	523,642	417,842

*To match the current total population of 1,931,684, a proportional multiplier was applied to the original figures for options with boundary changes. This preserves the relative population distribution across each area while ensuring the total aligns with up-to-date data.

Option 5a – Five Unitaries*



Key
 White line – District Boundary
 Dotted line – Boundary Change

N	W	E	M	S
330,536	544,814	342,934	340,286	373,115

*To match the current total population of 1,931,684, a proportional multiplier was applied to the original figures for options with boundary changes. This preserves the relative population distribution across each area while ensuring the total aligns with up-to-date data.

2. Executive Summary

Kent and Medway: A county of national significance

Kent and Medway is a county of scale, complexity, and consequence. As the UK's gateway to Europe, our geography is unique - bordering the capital and the continent, with the Port of Dover and the Channel Tunnel forming critical arteries for national trade and security. Our 1.9 million residents live across a diverse landscape of coastal towns, rural communities, and urban centres, with no single dominant city. This polycentric structure brings both opportunity and challenge.

Our economy is broad and resilient, generating £44 billion GVA annually, with strengths in logistics, life sciences, construction, and creative industries. Yet, we face stark disparities, particularly in East and North Kent, where deprivation, housing pressures, and health inequalities are most acute. These challenges are compounded by border-related pressures, including the arrival of Unaccompanied Asylum-Seeking Children and pressure on local road networks. Kent and Medway bears the brunt, but these are national issues that impact the country's economy and resilience.

In the face of this complexity, Kent and Medway has a strong track record of partnership working. Our coterminous arrangements with key partners including Kent Police and NHS Kent and Medway, and many well-established pan-Kent and Medway partnerships, such as Kent and Medway Economic Partnership, provide a solid foundation for integrated public service delivery. These partnerships are built on trust, scale, and shared purpose and they exist at a Kent and Medway level because that is what works best here.

KCC's Strategic Business Case for Local Government Reorganisation

This Strategic Business Case sets out Kent County Council's (KCC) proposal for Local Government Reorganisation (LGR) in Kent and Medway – a single unitary with three Area Assemblies, balancing scale and capacity with local responsiveness.

It has been developed through detailed internal analysis, independent financial modelling, and active participation in the joint Kent and Medway process. While KCC has developed this case independently, we remain committed to collaboration and transparency with our partner councils.

Our approach is rooted in a vision for better outcomes through financially sustainable, community-rooted, and digitally enabled public services. We support the design principles agreed across Kent and Medway - resident-centric, integrated, data-driven, financially resilient, and future-focused. However, our route to achieving these outcomes is distinct. For KCC, the overriding priority is the long-term financial resilience of local government in Kent and Medway. Our strategic outlook as the largest council in the area, responsible for 73% of all council spending and with statutory responsibilities to support some of the most vulnerable people in our communities means we cannot allow LGR to risk creating councils that will fail in their duties to Kent and Medway residents.

A unique county needs a unique solution: the Kent Council

Kent and Medway's geography and position make it one of the most complex and strategically significant areas in the country. Its border location, combined with deep disparities in deprivation between East and West, creates uneven demand and financial pressures that require coordinated, county-wide responses. The peninsular geography limits market options and workforce mobility, reinforcing the need for scale, resilience, and strategic coherence in service delivery.

The current county-wide model enables Kent and Medway to manage these challenges effectively. It provides the critical mass needed to maximise economies of scale, maintain service capacity, and deliver consistent outcomes. This structure not only benefits local communities but also supports national interests - Kent and Medway are a reliable partner to Government in managing issues of national importance.

Disaggregating the county into multiple unitary authorities would severely compromise this strategic capacity. It would fragment services, risking 'postcode lotteries' for residents and deterioration of service quality, particularly in high-risk areas such as social care and Special Educational Needs and Disabilities (SEND). Increased costs would come from duplicating senior roles and back-office costs and reduced purchasing power. This would be to the detriment of the entire county, but for some areas it is an existential threat.

On top of managing the majority of the county's highest and most costly needs for council services, a smaller unitary in East Kent would be quickly overwhelmed by the statutory responsibility and financial burden of safeguarding Unaccompanied Asylum-Seeking Children. The loss of scale would make it harder to absorb demand shocks and maintain service quality for all children and families. Infrastructure management would also suffer. Kent's strategic road network cannot be effectively overseen in isolated pockets. Protocols like Operation BROCK require county-wide coordination to prevent gridlock and maintain national connectivity. Fragmentation would make such coordination impractical, risking disruption not just locally but nationally.

There is no realistic way to mitigate these disadvantages. Shared service arrangements are unlikely to withstand the pressures of Kent and Medway's complexity and tend to result in poorer outcomes and higher costs. Crucially, there is currently no timeline for establishing a Strategic Authority, meaning disaggregation would dismantle the only existing structure capable of maintaining county-wide cohesion.

In short, breaking up Kent and Medway would not only weaken local service delivery, it would undermine the county's ability to respond to national challenges, destabilise critical response arrangements, and erode the strategic resilience that currently benefits the whole country.

KCC is clear: the most viable option for LGR in Kent and Medway is a single unitary authority - the Kent Council. This model is uniquely designed to meet the scale, complexity, and strategic importance of our county. It delivers the benefits of reorganisation while avoiding the risks of fragmentation.

The Kent Council would:

- ✓ Avoid the substantial risks of disaggregation of key services and loss of scale that are unsustainable given the unique challenges Kent faces – avoiding disruption that could have both a local and national impact.
- ✓ Maximise the financial savings available through the process of LGR in both the short- and long-term, putting the entire area on a firmer financial footing and quickly reinvesting into services.
- ✓ Keep Kent and Medway together, respecting our area's strong identity, protecting well-established partnerships and tried and tested service delivery arrangements.
- ✓ Provide high-quality and effective services, benefiting from a critical mass of capability and capacity across the area and ensuring a consistent service for everyone who needs support.
- ✓ Speak up for Kent and Medway with one powerful and cohesive voice.
- ✓ Shape the future growth of our county in a coordinated and strategic way, aiming for a high quality of life for all.
- ✓ Accelerate and invest in Public Service Reform, transforming how public services work for people and places.
- ✓ Through Area Assemblies, provide local responsiveness, flexibility and innovation in community services, working with local partners and people.
- ✓ Embed an enhanced community engagement approach that suits modern life and that is focused on tackling problems rather than servicing layers of governance.
- ✓ Have fewer, empowered and well-supported councillors with a meaningful role and influence, streamlining local democracy and improving accountability.
- ✓ Avoid the costly and bureaucratic addition of another layer of local government through a Mayoral Strategic Authority – the Kent Council would provide the strategic capacity for the devolution of powers and funding that Government is seeking, capitalising on Kent and Medway's existing scale and experience.
- ✓ Ensure a smooth transition, with minimal change and disruption to residents and minimal cost.

What the people of Kent and Medway and our key stakeholders think

KCC believes that any discussion about the future of local government in Kent and Medway must include the voice of our residents and the key stakeholders that work in and know the area best. Between the hurried Government process for LGR, a new administration for KCC, and the time taken to work with other councils in the joint process, time to engage with people at this stage has been short. However, this has been a priority for KCC and an intensive period of engagement has been undertaken so that the views and preferences of our residents and key partners can be included in this Strategic Business Case. We are grateful to the xxxx *(to be added)* people who completed our online survey, and the many partners who took the time to tell us their views. The most important things for people in Kent and Medway about the future of local government and LGR are:

Summary of key engagement points to be added here in the final Strategic Business Case

The most financially sustainable option for Kent and Medway

Local authorities in Kent and Medway face significant financial challenges, particularly in adult social care, children's services, and SEND. These pressures are unevenly distributed, with higher demand in East and North Kent.

A single unitary will cost less and deliver greater savings quicker

- Avoids the costs and risks of disaggregating key countywide services which could add up to £68 million per year in other options.
- Delivers the highest net recurring benefit of £69 million per year, cumulative £457 million after 10 years which is more than double the highest predicted cumulative saving for any of the multi-unitary options.
- The difference in cumulative benefit between a single unitary and the three-unitary option equates to between £340 to £478 on Band D council tax over a ten-year period (and even more for other options).
- Incurs the lowest transition costs - £99 million compared to up to £139 million for other options.
- Delivers the fastest payback period - 3.3 years compared to up to 14 years (or potentially never) in other options.

A single unitary is fairer and sustainable for the whole county

- Avoids concentrating unsustainable financial pressures on individual unitaries, particularly in East Kent. Spend per head on adult social care could vary by nearly £200 between individual unitaries, for example.
- A single rate of council tax across the county and a wide tax base, evening out disparities in revenue raising potential.
- Assuming average harmonisation, most households in a single unitary would pay less council tax than if they were resident in one of the multi-unitary options.
- Avoids unitaries inheriting uneven distributions of legacy debt, which currently varies hugely from £0 to £2134 per head in different parts of the county.

The following table provides comparison of key financial information across the options being considered for Kent and Medway.

LGR option	Implementation costs (one off) (£m)	Reorganisation savings (gross) (£m)	1a enhancement / Disaggregation costs (£m)*	Recurring annual savings (£m)**	Estimated payback period (years)	10-year cumulative impact of transformation (£m)
1a	(99.4)	75.0	(6.0)	69.0	3.3	457.4
3a	(127.7)	69.4	(19.7) - (29.2)	49.7 - 40.2	5.4 - 6.7	132.1 – 226.5
4b	(130.9)	67.5	(32.9) - (48.6)	34.6 - 18.9	7.8 - 14.3	(80.6) – 76.7
4d	(135.9)	67.5	(32.9) - (48.6)	34.6 - 18.9	7.9 - 14.5	(85.6) – 71.7
5a	(139.1)	65.7	(46.0) - (68.1)	19.7 - (2.4)	14.0 – no payback	(298.1) – (77.9)

**The range demonstrates the sensitivity of changing just one of the cost assumptions in the model between 0% and 1% for disaggregation costs following collaborative discussions around different scenarios for the impact of LGR on commissioned spend across adult and*

children's social care. The range is not required for 1a as there is no disaggregation of social care.

**** Recurring savings = gross reorganisation savings minus disaggregation costs**

The single unitary is the clear financial choice – sustainable, fair and quickly unlocks maximum savings to reinvest into services for Kent and Medway residents.

Right for Kent and Medway and a strong fit for Government

Kent Council is a strong fit for the government's criteria for Local Government Reorganisation. It meets all requirements for scale and efficiency, protecting service quality and enhancing engagement with our communities.

Criterion	Single unitary	Multiple unitaries
Establishing a single tier	Meets all requirements; maximises scale and equity	Creates disparities in tax yield, service quality, and financial resilience
Efficiency and resilience	Highest savings, lowest costs, fastest payback	High transition costs, low savings, long or no payback
High-quality services	Maintains scale and consistency; avoids fragmentation	Risks to safeguarding, social care, and SEND services
Local consensus	Delivers value for money and fairness; respects local identity	Reinforces East/West divide; adds complexity and variation
Supports devolution	Devolution-ready; avoids need for MSA	Adds cost; undermines strategic coherence
Community engagement	Enhanced community engagement approach and Area Assemblies	Smaller scale but limited capacity for engagement

The Kent Council – effective, efficient and fit for the future

Better for people

The Kent Council will use its scale and capacity to maximise the opportunities from LGR, giving Kent and Medway residents a council that delivers value for money, services that work for them and building communities that thrive. It will deliver better services for people by integrating public services around individuals and communities, enabling a shift from reactive crisis management to proactive prevention. With a single strategic authority, services such as social care, housing, education, and public health can be designed and delivered holistically, reducing duplication and ensuring residents receive the right support at the right time. The council's scale will allow for more effective commissioning, stronger partnerships with the NHS and Police, and better use of data and digital tools to anticipate needs and personalise services. This integration will improve outcomes, reduce long-term costs, and ensure that vulnerable residents are not lost in a fragmented system.

Better for places

For places, the Kent Council will provide the strategic capacity to plan and invest in infrastructure, housing, and economic development at the scale required to meet the county's complex and growing needs. A single council will enable coordinated spatial planning, ensuring that housing growth is sustainable and supported by the necessary transport, health, and education infrastructure. It will also strengthen Kent's voice with government and investors, attracting funding and shaping policies that reflect the county's priorities. By aligning economic development, skills, and planning strategies, the Kent Council will support thriving local economies and ensure that all communities - urban, rural, and coastal - benefit from growth and investment.

By consolidating services and governance into a single authority, the Kent Council will unlock the ability to plan and deliver visible, everyday services more effectively. From cleaner streets and better-maintained parks to more responsive local highways and accessible leisure facilities, the council will be able to reinvest savings into the services that matter most to people's daily lives. This will not only improve quality of life but also restore public confidence in local government by demonstrating clear, tangible value for money. While the scale of the Kent Council would be an inherent advantage, it is also critical that a large unitary authority remains in touch with and responsive to the diverse needs of Kent and Medway's communities and ensure that people feel represented and heard. We have therefore designed the model for the Kent Council to acknowledge and mitigate these risks, thinking beyond traditional ways of working in local government where this will allow the Kent Council to best serve its residents.

Local leadership, local decisions

The creation of three Area Assemblies in North, East, and West Kent will ensure that the Kent Council remains closely connected to the communities it serves. These Assemblies will be empowered to make decisions on how community services are run, enabling a more tailored and responsive approach that reflects the distinct identities, needs, and priorities of local areas. Aligned with natural patterns of travel, healthcare, and policing, and mirroring existing service delivery footprints, the Area Assemblies will provide a practical and democratic mechanism for local voices to influence service design and delivery. By embedding decision-making at a more local level for community services, the Kent Council will combine the benefits of strategic scale with the agility and insight needed to respond effectively to community concerns and aspirations.

Engagement and local democracy that works for people

The Kent Council will invest in a modern, practical approach to community engagement that prioritises real problem-solving over unnecessary layers of governance. Rather than replicating costly and bureaucratic structures, the council will embed engagement into the way it works—through a Strategic Engagement Framework, a dedicated Community Engagement Team, and a toolkit of inclusive methods such as citizen assemblies, digital platforms, and local partnerships. This approach will ensure that residents are not only heard but actively involved in shaping services that reflect their needs and priorities. By working with trusted local networks, including town and parish councils and the voluntary sector, the Kent Council will build strong, responsive relationships with communities, ensuring that engagement is meaningful and suits the way people want to interact with their council.

Streamlined governance will be achieved by reducing the number of councillors from 658 across Kent and Medway's current councils to a proposed 118, delivering nearly £2.5 million in annual savings on basic member allowances compared to now. This reduction strikes a careful balance- ensuring the Kent Council remains a workable size while maintaining strong democratic representation. Councillors will be supported by a dedicated Member Support Unit and a simplified committee structure, enabling them to focus on strategic leadership and community advocacy. With smaller electoral divisions than the current county council and enhanced tools to manage casework, councillors will be better equipped to serve their communities meaningfully and effectively.

A smooth transition

A single unitary model offers the most straightforward and least disruptive path to reorganisation, avoiding the complexity and cost of disaggregating services across multiple new authorities. By building on existing capacity and infrastructure, this approach enables a smoother transition with minimal impact on residents and frontline services. KCC is committed to working with the other councils in Kent and Medway and with Government to plan and implement the new arrangements, ensuring services remain safe, legal, and effective from day one. At the same time, this model creates the strongest foundation for long-term transformation - unlocking opportunities to modernise services, improve outcomes, and deliver better value for money across the whole area.

Kent and Medway stands at a crossroads. The opportunity for Local Government Reorganisation must not be wasted on models that fragment services, entrench inequality, and increase costs. The Kent Council offers a bold, practical, and financially responsible solution - one that reflects the scale, identity, and strategic importance of our county. It will deliver better services, stronger communities, and a more resilient future for all our residents.

One Kent. One Council. Our Unique County.

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Executive summary

Introducing Option 4D

This option is supported by Medway Unitary Authority and the District and Borough Councils of [insert]. The Option 4D business case sets out a four-unitary model that balances local identity with strategic capacity.



	North Kent	West Kent	East Kent	Mid Kent
	615,931			417,842
Population		374,269	523,642	
Current council areas	- Medway (98%) - Gravesham (87%) - Swale (81%) - Dartford (78%) - Small sections of Tonbridge and Malling (3%) and Maidstone (2%)	- Sevenoaks - Tunbridge Wells - Tonbridge and Malling (61%) - Dartford (22%) - Gravesham (13%) - Medway (2%)	- Canterbury - Dover - Thanet - Folkestone and Hythe (64%) - Swale (Faversham area 17%)	- Ashford - Maidstone (98%) - Folkestone and Hythe (36%) - Tonbridge and Malling (36%) - Swale (3%)
	A strategically vital growth corridor, defined by its dynamic mix of urban regeneration, industrial innovation, and world-class connectivity along the Thames Estuary. Anchored by Medway, Gravesham, Dartford, and Swale, it will drive economic opportunity, while celebrating a rich	A prosperous, knowledge-driven region with a highly skilled workforce, strong commuter links to London, and a landscape of historic market towns and rural villages. The area will leverage its high quality of life, green infrastructure, and cultural assets to attract investment and serve as a centre for	A distinctive coastal and rural economy, acting as the UK's gateway to Europe through its major ports and international transport links. The area will focus on regeneration, tourism, green energy, and creative industries, underpinned by strong educational institutions, a vibrant cultural scene, and a	The historic heart of the county, combining the county town of Maidstone, the growth hub of Ashford, and rural and coastal communities. With excellent transport connectivity and a balanced economic base, it will drive infrastructure-led growth, innovation and sustainable development, while

heritage and diverse, youthful communities.

innovation, education, and environmental stewardship.

commitment to delivering quality services across its diverse communities.

retaining its strong identity and civic traditions.

Purpose and approach (see section 1)

The reorganisation of local government presents a valuable opportunity to redesign a system that better serves the diverse needs of Kent and Medway's residents.

The 14 councils of Kent have collaborated to develop a model reflecting established population and economic centres as well as community and workplace patterns.

Through this joint effort, the councils have developed five business cases addressing the government's six reform criteria, proposing to replace the current two-tier system with more efficient and resilient unitary authorities.

These authorities aim to support devolution, enhance service delivery and strengthen community engagement.

Each proposal is underpinned by a shared evidence base, robust governance, transparent appraisal and extensive stakeholder and public consultation to form a united and evidence-led vision for the future of local government in Kent and Medway.

	Option 1a	Option 3a	Option 4b	Option 4d	Option 5a
					
Approach to drafting	Kent County Council leading with some shared input around finance and services.	Common approach to drafting with input from councils.			
Structure, formatting and branding	Separate structure, formatting and branding.	Single approach to structure, formatting and branding across four business cases. A significant proportion of content across the four cases will be shared and clearly highlighted within the cases.			

The Kent context (see section 2)

Kent, located in the south east of England, is a geographically diverse and economically important area.

Known as the Garden of England and the UK's Gateway to Europe, it covers 3,739 sq. km with a population of about 1.93 million.

The county combines densely populated urban centres with extensive rural areas.

Its landscape includes the North Downs, The Weald, and a long coastline featuring the White Cliffs of Dover. Rivers like the Thames, Medway and Stour support trade and settlement.

Economically, Kent has evolved from its agricultural roots into a modern, mixed economy encompassing manufacturing, logistics, life sciences, tourism and digital industries.

Major assets include the Port of Dover, the Discovery Park science and technology hub and excellent transport links.

Kent's strategic location, skilled workforce and innovation hubs drive regional growth and support its case for devolution and local government reform.

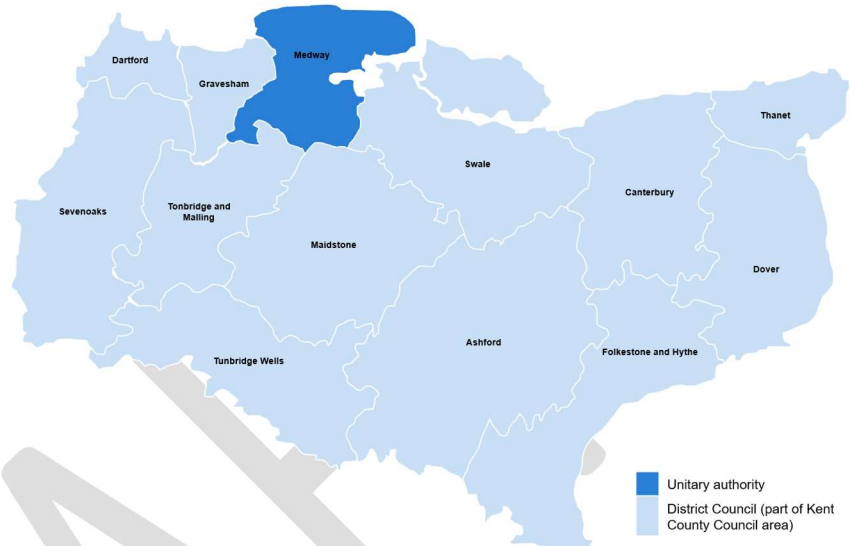
Kent currently has a two-tier local government system.

At the upper tier is Kent County Council, while the lower tier consists of 12 district and borough councils.

Medway Council functions separately as a unitary authority.

In addition, there are more than 300 town and parish councils handling local-level services.

The current mixed model of service delivery creates complexity and all 14 councils recognise the potential benefits of moving towards a single-tier system with fewer organisations and a more unified governance structure.



Challenges and opportunities (see section 3)

Councils across the county face financial pressures and rising demand.

In Kent, key pressures include:

- uneven funding and tax bases
- escalating social care and border-related costs
- workforce shortages and morale issues
- fragmented governance across the two-tier system

Local Government Reorganisation (LGR) offers a unique opportunity to create a more efficient, resilient and sustainable model.

By simplifying structures and pursuing devolution, Kent can streamline service delivery, strengthen financial stability, enhance collaboration across sectors, attract investment and build a greater sense of place to ensure more cohesive, accountable and community focused local government services.

Vision and principles for Local Government Reorganisation (see section 4)

Our vision for local government in Kent is:

Better outcomes for Kent residents through financially-sustainable and accountable local public services delivered in partnership with communities.

LGR is the catalyst for transformation and reform, creating resilient, digitally-enabled councils rooted in local identity and strong partnerships.

It is crucial that devolution and LGR are linked: structural reform unlocks the powers, funding and flexibility needed to make decisions locally and drive growth.

Kent's ambition is to deliver better outcomes for all residents through sustainable, accountable and community-focused public services.

All councils in Kent are united in their support for devolving powers to a single strategic authority.

This will ensure decisions about Kent are made in Kent, by those who know its communities best.

LGR and devolution are intrinsically linked. To fully realise our vision, we need the powers, funding and countywide collaboration that only a devolution deal and a new strategic Kent authority can provide.

We are committed to securing a devolution deal for Kent at the earliest possible opportunity.

Option 4D: Four New Councils, One Bold Future for Kent

Option 4D is a modern, locally attuned model for Kent and Medway which offers a forward-thinking approach to local government, combining financial resilience and efficiency with a deep respect for community identity and heritage. By restructuring Kent and Medway into four strong, locally focussed unitary authorities, it brings decision making closer to the people it affects, ensuring services are designed around real lives rather than distant structures. Boundaries are drawn around natural geographies, economic corridors, and historic communities, creating councils that are functional, recognisable, and locally accountable.

This simpler, stronger structure empowers communities, protects Kent's distinct character, and unlocks the full potential of devolution. Each council – serving between 375,000 and 625,000 residents – balances scale with local voice, aligns with government guidance, and provides capacity for sustainable growth.

The case for Option 4D (see section 5)

Option 4D's boundaries are carefully drawn to reflect Kent's natural growth and transport corridors, such as the M2/A2, Thames Gateway, M20/HS1 and geographic landmarks, ensuring that each council is both functional and recognisable to residents. It ensures coherent service delivery, preserves historic civic centres and cultural assets, maintains partnerships across health, policing, education, and voluntary sectors, and creates a robust platform for a future Kent & Medway Combined Authority. It is premised on the strong belief that efficiency arises from integration, simplification, and accountable local government.

Together, these features make Option 4D the most balanced, future-ready model for Kent and Medway - delivering scale without sacrificing identity. Key strengths include:

- **Balanced population and fiscal scale:** Each council is of optimum size for long-term sustainability, with robust tax bases and economic output. Council tax rates are closely aligned, minimising disruption and supporting fiscal resilience across all councils.
- **Functional economic and transport corridors:** Boundaries reflect Kent's natural economic and travel patterns, supporting coherent policy implementation and efficient service delivery.
- **Preservation of local identity and heritage:** The model respects historic communities, civic centres, and cultural assets, retaining a strong sense of place and pride.
- **Continuity of partnerships and institutions:** The geography aligns with existing economic, health, policing, education, transport, emergency, and voluntary-sector partnerships, enabling effective partnership working.
- **Devolution readiness:** Four balanced, functional councils form the ideal platform for a future Kent & Medway Combined Authority, meeting government expectations for scale, parity, and collaboration.

Summarised below are the key arguments for why option 4D is the best model for Kent and Medway.

Key theme	Arguments
Balanced population and fiscal scale	Four councils, each serving 375,000–625,000 residents, meet the optimum size for a viable council. This ensures: • A strong resident voice • Financial resilience • Sustainable budgets Each area is designed to be economically robust within its geography, supporting financial resilience and growth. GVA and council tax bases are balanced. <i>Criteria 1, 2, 5, 6</i>
Functional housing, economic and transport geographies	Boundaries follow Kent's natural transport and travel routes, as well as key infrastructure sites, supporting economic development and service delivery. The coherent geographies will enable environmental financial management to take place at scale. Boundaries follow natural and defined features such as rivers, transport and economic corridors: • North Kent – Thames Gateway growth and port economy • East Kent – coastal regeneration and health equality • Mid Kent – M20/HS1 corridor and balanced rural-urban growth • West Kent – rural, commuter and environmental heartland Option 4D will enable a more coherent approach to housing strategy across the region. <i>Criteria 1, 2, 3</i>
Financial Sustainability	Local government reorganisation will require investment in the short term, however if implemented well, the net annual savings could result in a payback period of around 7.9 years, resetting local government for the

next fifty years, delivering public service reform and leading to longer term financial sustainability.

Criteria 2

Preservation of local identity and heritage and a sense of community	Boundaries respect historic communities and cultural assets, retaining a strong sense of place and pride. The model is explicitly designed to reflect and reinforce local community identities, fostering stronger relationships with voluntary, community, and faith sectors (VSFS), and enabling more effective public engagement and regeneration initiatives. <i>Criteria 1, 4, 6</i>
Efficient and representative democratic arrangements	Option 4D achieves enhanced accountability and a strong local focus, with democracy and fairness at its core. Each council will have 65-91 councillors, with a ratio of roughly 1 councillor per 4,500-5,000 residents. <i>Criteria 1, 2, 5, 6</i>
Targeted, high-quality public services & Public Service Reform	Creating councils with a closer proximity to their citizens will enable the targeted, community-led delivery of statutory services, with resources managed more effectively and services tailored to local needs. Option 4D aims to create a balanced, place-based approach to services delivery and embeds the principles of community-first, prevention, collaboration, and digital innovation, enabling services designed around residents, not organisations. <i>Criteria 3</i>
Alignment with health and care systems	The model builds on Kent and Medway's strong collaborative networks, with alignment to the ICB health and care partnerships. Furthermore, it builds on regional collaborations to drive growth, skills and strategic infrastructure. This is demonstrated through the Kent & Medway Economic Partnership (KMEP) and through the Transport for the South East (TfSE) arrangement. <i>Criteria 3, 6</i>
Devolution readiness	Four balanced councils provide a strong foundation for future devolution and regional collaboration. A balance in population and fiscal strength will provide parity of influence and shared governance within a devolution deal. The four council model is sufficiently large to act strategically and efficiently yet remain connected to local communities. <i>Criteria 5</i>

Implementation plan (see section 6)

Kent's LGR implementation plan aims to follow a phased and collaborative approach across all councils, leveraging a well-established shared programme with strong governance and joint planning.

The process is structured into preparation, foundational, shadow authority, officer leadership and go-live phases, each with clear priorities to ensure a smooth transition while driving ambitious public service reform alongside devolution.

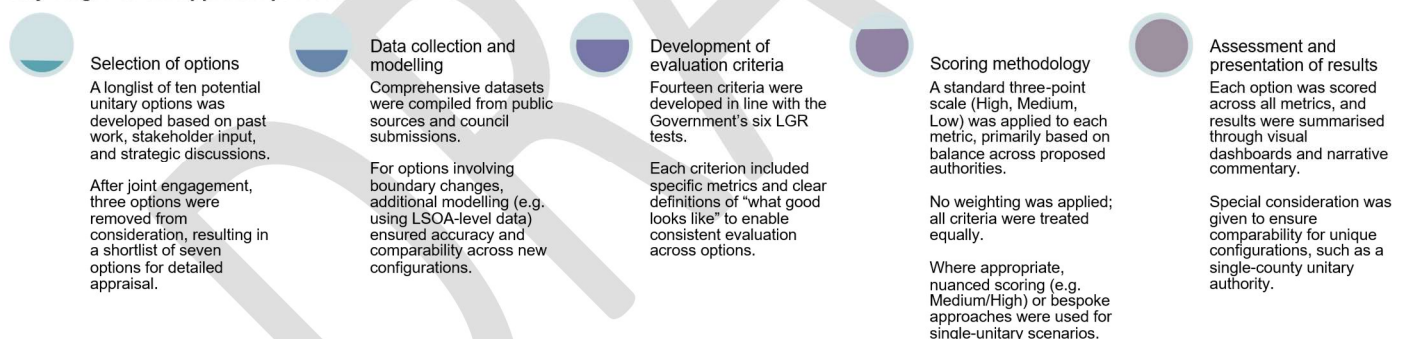
The programme builds on Kent's history of joint working and lessons from previous LGR efforts, supported by targeted governance, workstreams and stakeholder engagement to mitigate risks related to service disaggregation, aggregation, ICT and working together, aiming for a seamless, efficient transition that benefits residents and public services over the long-term.

Options appraisal (see Appendix 1)

A rigorous and collaborative process undertaken by the 14 Kent local authorities to appraise potential council governance options. The aim was to provide a robust, consistent, and evidence-based foundation to support local decision-making on which options should advance to full business case development.

The appraisal followed national guidance and was aligned with the Government's six criteria for local government reorganisation, as set out in correspondence from the Secretary of State in February and June 2025. Importantly, the process did not rank or recommend any preferred option but provided a shared evidence base to inform council decisions.

Key stages of the appraisal process:



Council Leaders reviewed the appraisal findings, supported by resident and stakeholder views. While the appraisal did not determine a preferred option, it served as an objective and structured basis for informed political judgement and democratic decision-making on which options should proceed to business case development.

Financial modelling (see Appendix 2)

Finance officers across all 14 Kent councils have reviewed and adjusted the financial modelling in order to provide a single financial assessment of models for inclusion in proposals to government.

The key driver of difference between options are the number of councils being proposed.

Due to the assumptions applied within the modelling, implementation costs and recurring costs of disaggregation increase as the number of councils proposed increases.

The headline numbers for Option 4D are set out below:

LGR option	Implementation costs (one-off) (£m)	Reorganisation savings (gross) (£m)	Disaggregation costs (£m)*	Recurring annual revenue savings (£m)**	Estimated payback period
Option 4D	(135.9)	67.5	(32.9) – (48.6)	18.9 – 34.6	7.9 – 14.5 years

**A range has been applied specifically for disaggregation costs following collaborative discussions around different scenarios for the impact of LGR on commissioned spend across adult and children's social care.*

***Recurring revenue savings = gross reorganisation savings less disaggregation costs*

Data sources (see Appendix 3)

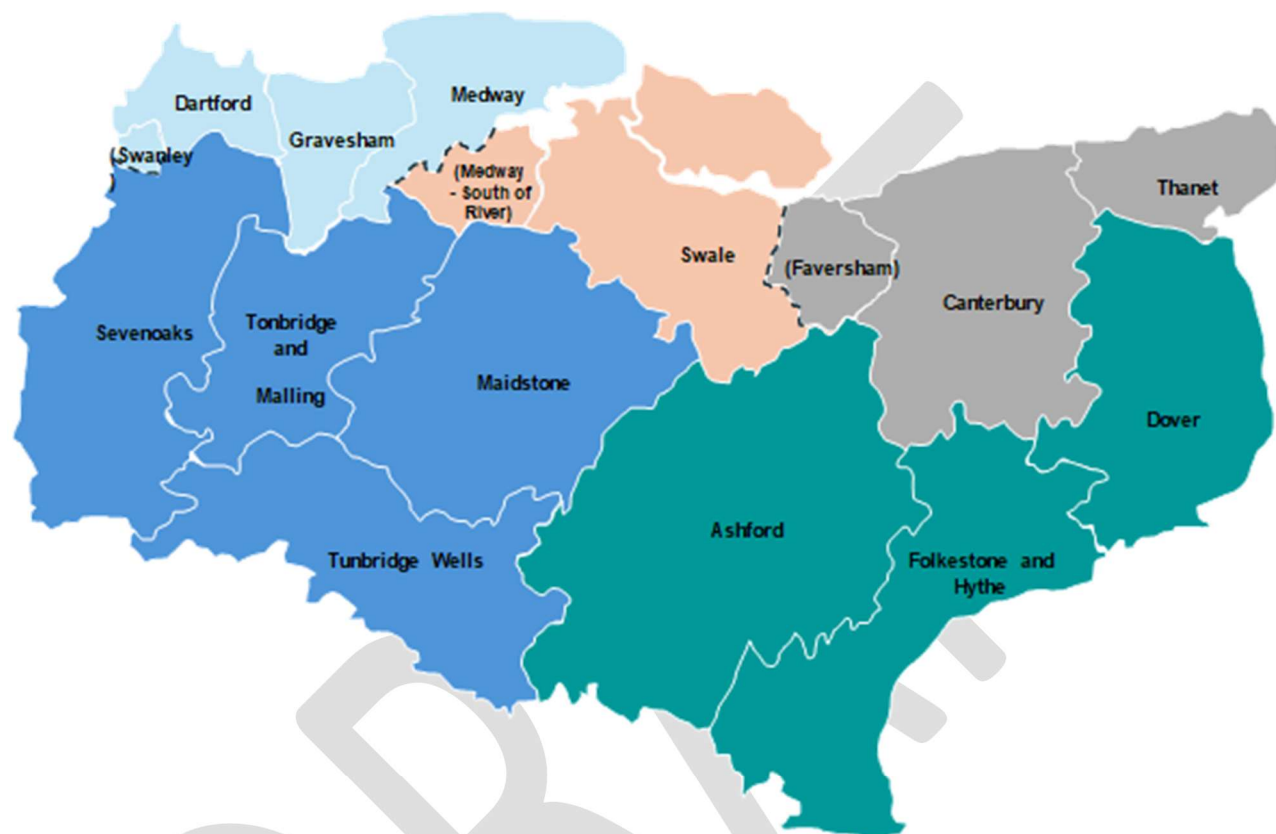
A common data set was used for all analyses presented in this case.

Details of the data set including its source, structure and variables, are provided in Appendix 3.

Executive summary

Introducing Option 5A

Option 5A sets out a five-unitary model of local government in Kent, built around natural places and identities, that will maximise the benefits of local, connected government and provide strong capacity for growth. The model is supported by the Borough Councils of [Councils to be inserted].



Key:

White line – District Boundary

Dotted line – Boundary Change

Unitary	Population	Description
North Kent - Dartford - Gravesham - Medway west of River Medway - Swanley	330,536	A strategically important logistics and infrastructure hub, North Kent will drive economic growth through its proximity to London, major transport corridors (M25, M2), and international gateways like Ebbsfleet and the Port of Sheerness. It will focus on clean growth, advanced manufacturing, and professional services, with a diverse population and strong urban regeneration potential.
West Kent - Maidstone - Sevenoaks (excluding Swanley) - Tonbridge & Malling - Tunbridge Wells	544,814	West Kent offers a mix of rural and urban economies, a thriving visitor and tourism sector, with increasing focus on innovation and service industries. Defined by strategic connectivity and a highly skilled workforce, supporting professional services, life sciences and creative

		sectors. The area has a high proportion of knowledge-based employment and is well-positioned to attract inward investment from London and beyond. Green infrastructure, heritage towns and quality of life are key drivers of investment in the sub-region.
East Kent • Canterbury • Faversham • Thanet	342,934	East Kent is defined by its international gateways, strong cultural heritage, and growing sectors in health, life sciences, and the creative economy. Canterbury leads as an education and cultural centre. Thanet and surrounding coastal towns offer regeneration potential and tourism appeal, supported by lower land values.
Mid Kent • Medway east of River Medway • Swale excluding Faversham	340,286	A growing business hub in the Kent region with a demographically diverse population, Mid Kent is set up to drive the economy through business growth. It will focus on leveraging its local sector mix involving high value technology, engineering manufacturing and knowledge intensive businesses through the Chatham Innovation Park. Mid Kent will benefit from the business growth and will focus on skill retention and growth, shared infrastructure, ambition and innovation. The area also benefits from a strong network of local Universities and Colleges that will provide a sustainable pipeline of skilled workers to support the business growth in the region.
South Kent • Ashford • Dover • Folkstone & Hythe	373,115	As Kent's own international hub, South Kent will unlock significant economic potential. South Kent will drive economic growth by leveraging its strong footprint in the logistics and distribution industries through the Channel Corridor. The area also benefits from a robust and growing life sciences industry that currently houses the Discovery Park which is home to 160 companies spanning international pharmaceutical companies inviting further investment and economic growth.

Purpose and approach (see section 1)

The reorganisation of local government presents a valuable opportunity to redesign a system that better serves the diverse needs of Kent and Medway's residents.

The 14 councils of Kent have collaborated to develop a model reflecting established population and economic centres as well as community and workplace patterns.

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Through this joint effort, the councils have developed five business cases addressing the government's six reform criteria, proposing to replace the current two-tier system with more efficient and resilient unitary authorities.

These authorities aim to support devolution, enhance service delivery and strengthen community engagement.

Each proposal is underpinned by a shared evidence base, robust governance, transparent appraisal and extensive stakeholder and public consultation to form a united and evidence-led vision for the future of local government in Kent and Medway.

	Option 1a	Option 3a	Option 4b	Option 4d	Option 5a
					
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The county combines densely populated urban centres with extensive rural areas.

Its landscape includes the North Downs, The Weald, and a long coastline featuring the White Cliffs of Dover. Rivers like the Thames, Medway and Stour support trade and settlement.

Economically, Kent has evolved from its agricultural roots into a modern, mixed economy encompassing manufacturing, logistics, life sciences, tourism and digital industries.

Major assets include the Port of Dover, the Discovery Park science and technology hub and excellent transport links.

Kent's strategic location, skilled workforce and innovation hubs drive regional growth and support its case for devolution and local government reform.

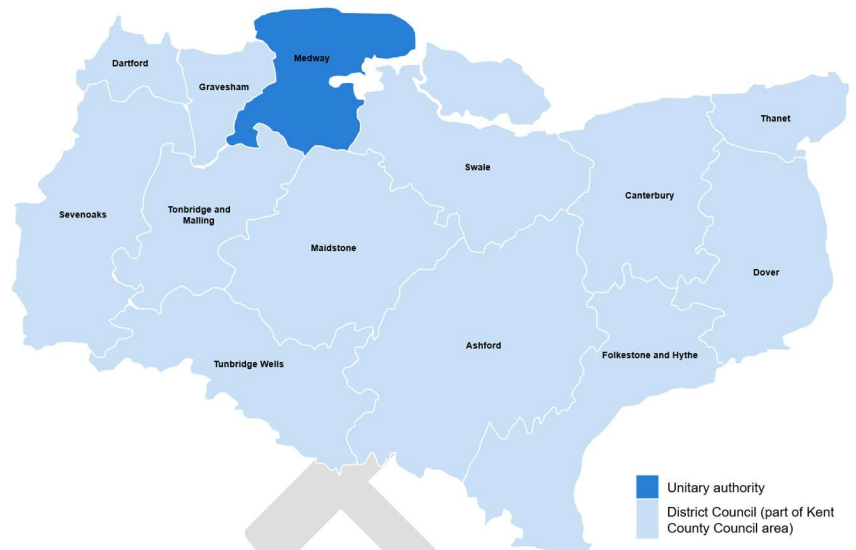
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At the upper tier is Kent County Council, while the lower tier consists of 12 district and borough councils.

Medway Council functions separately as a unitary authority.

In addition, there are more than 300 town and parish councils handling local-level services.

The current mixed model of service delivery creates complexity and all 14 councils recognise the potential benefits of moving towards a single-tier system with fewer organisations and a more unified governance structure.



Challenges and opportunities (see section 3)

Councils across the county face financial pressures and rising demand.

In Kent, key pressures include:

- uneven funding and tax bases
- escalating social care and border-related costs
- workforce shortages and morale issues
- fragmented governance across the two-tier system

Local Government Reorganisation (LGR) offers a unique opportunity to create a more efficient, resilient and sustainable model.

By simplifying structures and pursuing devolution, Kent can streamline service delivery, strengthen financial stability, enhance collaboration across sectors, attract investment and build a greater sense of place to ensure more cohesive, accountable and community focused local government services.

Vision and principles for Local Government Reorganisation (see section 4)

Our vision for local government in Kent is:

Better outcomes for Kent residents through financially-sustainable and accountable local public services delivered in partnership with communities.

LGR is the catalyst for transformation and reform, creating resilient, digitally-enabled councils rooted in local identity and strong partnerships.

It is crucial that devolution and LGR are linked: structural reform unlocks the powers, funding and flexibility needed to make decisions locally and drive growth.

Kent's ambition is to deliver better outcomes for all residents through sustainable, accountable and community-focused public services.

All councils in Kent are united in their support for devolving powers to a single strategic authority.

This will ensure decisions about Kent are made in Kent, by those who know its communities best.

LGR and devolution are intrinsically linked. To fully realise our vision, we need the powers, funding and countywide collaboration that only a devolution deal and a new strategic Kent authority can provide.

We are committed to securing a devolution deal for Kent at the earliest possible opportunity.

The case for Option 5A

Option 5A strikes the best balance between local place-shaping and strategic delivery. It is the only option that both designs councils around natural communities which have existed for hundreds of years, and coherent geographies, and provides a robust platform for growth and investment. Option 5A will strengthen the engagement with people and place that effective delivery depends on.

Option 5A resolves historic boundary misalignments around Swanley and Faversham, bringing local government boundaries in line with established health geographies (HCPs), as well as children's social care and education commissioning arrangements, whilst also mirroring communities for worship and prayer. It also reflects the way local media and civic networks already operate across the County's natural community groupings. These boundary misalignments, noted since 1969, would finally be addressed through this reorganisation, setting sustainable boundaries fit for the next 50 years.¹

Importantly, Option 5A puts capacity and support where it is most needed. Against a range of metrics, there are four discrete regions within the County that have specific population needs (North, East, Mid and South Kent) - be that in terms of life expectancy, wider health determinants, skills attainment or economic factors - and one region (West Kent) which has less acute needs. Option 5A structures the new Unitary Councils in a way to match this need, with more agile Councils in those four areas to support communities through greater democratic representation. They also align with health, education, skills and employment geographies to improve outcomes for local people. This model therefore ensures tailored local focus whilst maintaining strategic coherence.

Option 5A provides the strongest relationship between the new councils and a future Strategic Authority, which will enable effective devolution of powers and resources for Kent.

Studies suggest that Kent's growth potential could include more than 400,000 homes (circa 1 million additional residents) and 480,000 jobs beyond what is encapsulated within existing adopted Local Plans. This growth potential would see the overall population of Kent rise to around 3 million. With growth forecast in the areas where Option 5A currently shows the lower population numbers (North, Mid, East and South Kent), this model will future-proof local government by aligning with the long term growth projections. As the population expands, the five council model will naturally equalise in size, ensuring responsive, resilient and locally attuned governance.

¹ <https://archive.org/details/1969-royal-commission-local-gov-vol-1-report/mode/2up>

The benefits of Option 5A are clear: better-quality housing, improved jobs/skills opportunities and improved health outcomes for our residents. It will also simultaneously deliver sustained economic growth for both Kent and the wider UK economy. This option will realise the unlocked potential that Kent has to offer.

We have summarised the key arguments for why the five-unitary model is best for Kent.

Key theme	Arguments	Government Criteria
Reflects natural communities and geographies	- Delivers authorities fully enabled to drive growth across the area by aligning housing delivery in the right areas, economic hubs and transport infrastructure, alongside established travel to work, education and health trends. - Uses the once in a generation opportunity to reorganise three local government boundaries to best fit our sense of place. - Reflects where we expect growth in Kent in the next 50 years and unlocks that growth by building regional architecture which harnesses those opportunities.	Criteria 1, ,3, 4, 5, 6
Delivers housing and economic growth across the whole area.	- Reflects local housing markets, and the migratory effect of London, while building scale to plan strategically to deliver housing growth across Kent. - Enables the future growth of Kent and establishes logical economic areas as the right foundation for sustainable, long-term growth. - Consolidates the existing travel to work trends spanning bus, rail and road connectivity.	Criteria 2, 3, 6
Savings of £65.7m which will pay back the investment in 14 years.	- Generates recurrent savings of £65.7m which will pay back the initial investment in 14 years. - Entails greater investment in the short term, but designs councils that ensure strong service delivery, place-based public service reform and sustainable growth, alongside providing greater scope to deliver long-term financial sustainability.	Criteria 2
Reflecting partnerships and how services are delivered	- Builds councils where health and care partnerships and supporting health architecture will operate together, providing the right footprint for prevention and early intervention and for wider public service reform. - Reflects how adult social care, children's services and education are commissioned	Criteria 3, 6

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	- Aligns with acute hospital demand supporting health and care integration, partnership working and public service reform. - Reflects existing police boundaries allowing for safer communities and opportunities to continue good community engagement.	
Strengthening cultural and historic identities	- Builds boundaries that reflect local needs, historic and future community identities and the natural and infrastructural geography of Kent. - Establishes councils that are closest to communities in Kent and reflect local communities, cultures and the identities of areas within Kent.	Criteria 1, 4, 6
Establishing truly local authorities	Establishes five councils across Kent and Medway maximising how local councils in Kent can realise the benefits from LGR.	Criteria 1, 5
Strong governance and healthy decision-making	Establishes five constituent authorities to a Strategic Authority and more constituent authorities provides stronger governance, debate and decision-making and better reflect the needs of local communities and the areas they reside in.	Criteria 5
Councils designed around communities	- Establishes councils focussed on communities allowing for more tailored and targeted service delivery, agile decision-making, community empowerment, co-creation and purposeful engagement. - Designs councils around communities and how they live and work in Kent, providing the right foundations to build community resilience, stronger emergency planning, intelligence and prevention into how public services work.	Criteria 4, 6
Fostering strong partnerships to connect communities	- Consolidates many council partnerships and shared services across Kent to build better resilience and support positive outcomes for our residents. - Retains existing deanery and diocese community relationships for the Christian faith, as well as patterns of worship within the Sikh communities of Kent further strengthening local identity and allowing our residents to continue building their strong communities.	Criteria 1, 4, 6

Base case

This is a Type B proposal entailing modifications to existing Kent council boundaries under Part 1 of the Local Government and Public Involvement in Health Act 2007. Section 5 includes a base case which meets the government's criteria and the modifications proposed.

Implementation plan (see section 6)

Kent's LGR implementation plan aims to follow a phased and collaborative approach across all councils, leveraging a well-established shared programme with strong governance and joint planning.

The process is structured into preparation, foundational, shadow authority, officer leadership and go-live phases, each with clear priorities to ensure a smooth transition while driving ambitious public service reform alongside devolution.

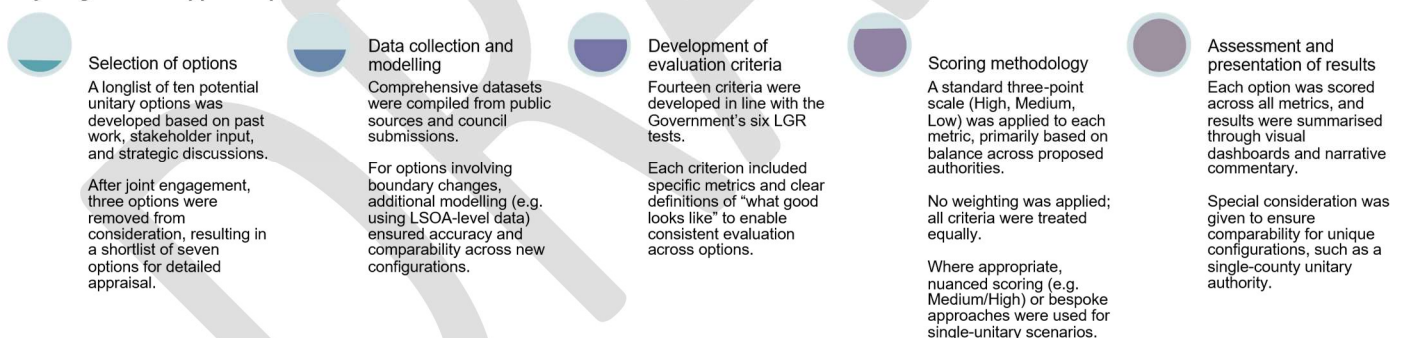
The programme builds on Kent's history of joint working and lessons from previous LGR efforts, supported by targeted governance, workstreams and stakeholder engagement to mitigate risks related to service disaggregation, aggregation, ICT and working together, aiming for a seamless, efficient transition that benefits residents and public services over the long-term.

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Key stages of the appraisal process:



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Financial modelling (see Appendix 2)

Finance officers across all 14 Kent councils have reviewed and adjusted the financial modelling in order to provide a single financial assessment of models for inclusion in proposals to government.

The key driver of difference between options are the number of councils being proposed.

Due to the assumptions applied within the modelling, implementation costs and recurring costs of disaggregation increase as the number of councils proposed increases.

The headline numbers for Option 5A are set out below:

LGR option	Implementation costs (one-off) (£m)	Reorganisation savings (gross) (£m)	Disaggregation costs (£m)*	Recurring annual revenue savings (£m)**	Estimated payback period
Option 5A	139.1	65.7	(46.0) – (68.1)	19.7 – (2.4)	14.0 years – no payback

**A range has been applied specifically for disaggregation costs following collaborative discussions around different scenarios for the impact of LGR on commissioned spend across adult and children's social care.*

***Recurring revenue savings = gross reorganisation savings less disaggregation costs*

The range of disaggregation costs has been agreed through the collaborative working of Kent finance officers. Our business case assumes increases in commissioned spend at the lower end of that range. There is evidence that councils with a population of 250-350k have lower unit costs across adult nursing and residential and S251 looked after children and children in residential care.² While the cost of care packages is complex this may relate to councils closer to communities being better able to tailor services and care packages to the strengths and needs of communities.

Government has been clear that whilst financial sustainability is a consideration, it is not the only indicator against which proposals will be judged. Option 5A delivers payback over the longer term whilst also placing resources where they are needed most to support local communities. The economic growth forecasts which come from that – potentially unlocking nearly 500,000 jobs which are not within existing Local Plans – and the financial return to the Treasury as a result should not be underestimated or ignored.

Data sources (see Appendix 3)

A common data set was used for all analyses presented in this case.

Details of the data set including its source, structure and variables, are provided in Appendix 3.

² Local Authority Interactive Tool 2023/24 and ASC-FR returns

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Equality Impact Assessment

An Equality Impact Assessment (EIA) is a document that summarises how the council has had due regard to the public sector equality duty (Equality Act 2010) in decision-making.

When to assess

An EIA should be carried out when you are changing, removing or introducing a new service, policy or function. The assessment should be proportionate; a major financial decision will need to be assessed more closely than a minor policy change.

Public sector equality duty

The Equality Act 2010 places a duty on the council, when exercising public functions, to have due regard to the need to:

- 1) Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010;
- 2) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- 3) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

These are known as the three aims of the general equality duty.

Protected characteristics

The Equality Act 2010 sets out nine protected characteristics that apply to the equality duty:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership*
- Pregnancy and maternity
- Ethnicity
- Religion or belief
- Sex
- Sexual orientation

*For marriage and civil partnership, only the first aim of the duty applies in relation to employment.

We also ask you to consider other socially excluded groups, which could include people who are geographically isolated from services, with low literacy skills or living in poverty or low incomes, affected by rural deprivation or poor health. This may impact on aspirations, health or other areas of their life which are not protected by the Equality Act, but should be considered when delivering services.

Due regard

To 'have due regard' means that in making decisions and in its other day-to-day activities the council must consciously consider the need to do the things set out in the general equality duty: eliminate discrimination, advance equality of opportunity and foster good relations.

How much regard is 'due' will depend on the circumstances and in particular on the relevance of the aims in the general equality duty to the decision or function in question. The greater the relevance and potential impact, the higher the regard required by the duty. The three aims of the duty may be more relevant to some functions than others; or they may be more relevant to some protected characteristics than others.

Collecting and using equality information

[The Equalities and Human Rights Commission](#) (EHRC) states that 'Having due regard to the aims of the general equality duty requires public authorities to have an adequate evidence base for their decision making'. We need to make sure that we understand the potential impact of decisions on people with different protected characteristics. This will help us to reduce or remove unhelpful impacts. We need to consider this information before and as decisions are being made.

There are a number of publications and websites that may be useful in understanding the profile of users of a service, or those who may be affected.

- The Office for National Statistics Neighbourhoods website <https://www.ons.gov.uk/>
- Kent County Council Facts and Figures about Kent <http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent>
- Public health and social care data http://www.kpho.org.uk/search?mode=results&queries_exclude_query=no&queries_excludefromsearch_query=yes&queries_keyword_query=Swale

At this stage you may find that you need further information and will need to undertake engagement or consultation. Identify the gaps in your knowledge and take steps to fill these.

Case law principles

A number of principles have been established by the courts in relation to the equality duty and due regard:

- Decision-makers in public authorities must be aware of their duty to have 'due regard' to the equality duty
- Due regard is fulfilled before and at the time a particular policy is under consideration as well as at the time a decision is taken. Due regard involves a conscious approach and state of mind.
- A public authority cannot satisfy the duty by justifying a decision after it has been taken.
- The duty must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- The person completing the EIA should have knowledge and understanding of the service, policy, strategy, practice, plan.
- The duty is a non-delegable one. The duty will always remain the responsibility of the public authority.
- A public authority is responsible for ensuring that any contracted organisations which provide services on their behalf can comply with the duty, are required in contracts to comply with it, and do comply in practice.
- The duty is a continuing one. It applies when a service, policy, strategy, practice or plan is developed or agreed, and when it is implemented or reviewed.
- It is good practice for those exercising public functions to keep an accurate record showing that they have actually considered the general duty and pondered relevant questions. Proper record keeping encourages transparency and will discipline those carrying out the relevant function to undertake the duty conscientiously.
- The general equality duty is not a duty to achieve a result, it is a duty to have due regard to the need achieve the aims of the duty.
- A public authority will need to consider whether it has sufficient information to assess the effects of the policy, or the way a function is being carried out, on the aims set out in the general equality duty.
- A public authority cannot avoid complying with the duty by claiming that it does not have enough resources to do so.

Lead officer:	Stephanie Curtis
Decision maker:	Full Council
People involved:	Local Government Reorganisation Officer Board – EMT, Communications and Policy Manager

Decision: • Policy, project, service, contract • Review, change, new, stop	To agree as Full Council which business case to submit to Government as part of the Local Government Reorganisation process, as the Councils preferred option.
Date of decision: The date when the final decision is made. The EIA must be complete before this point and inform the final decision.	Full Council – 19th November 2025
Summary of the decision: • Aims and objectives • Key actions • Expected outcomes • Who will be affected and how? • How many people will be affected?	Local authorities in Kent and Medway are responding to the Government's statutory invitation to submit proposals for Local Government Reorganisation (LGR), which seeks to replace existing local government structures with unitary models. This Equality Impact Assessment (EqIA) has been developed to assess the potential general implications of LGR and is not option specific. A more detailed and specific EqIA will be required once the government announces the final configuration of unitary councils across Kent and Medway. The reorganisation of local government presents a valuable opportunity to redesign a system that better serves the diverse needs of Kent and Medway's residents. The 14 councils of Kent have collaborated to develop models reflecting established population and economic centres, as well as community and workplace patterns. Through this joint effort, the councils have developed five business cases addressing the Government's six reform criteria, proposing to replace the current two-tier system with more efficient and resilient unitary authorities. These authorities aim to support devolution, enhance service delivery, and strengthen community engagement. Each proposal is underpinned by a shared evidence base, robust governance, transparent appraisal, and extensive stakeholder and public consultation, forming a united and evidence-led vision for the future of local government in Kent and Medway. The move to LGR will involve aggregation and disaggregation of services across multiple tiers of local government, requiring the redesign and realignment of functions and responsibilities. This process will affect how services are structured, accessed, and experienced by residents, with particular implications for those with protected characteristics. It presents both challenges and opportunities, and while there may be short-term disruption as services are reorganised, there is also potential to create more coherent, inclusive, and responsive systems that better reflect the needs of Kent and Medway's diverse communities. Ensuring that equality considerations are central to this transformation will be critical to mitigating risks and maximising the benefits of reform. This EqIA supports the LGR process by identifying and addressing the potential impacts of the proposed changes on those with protected characteristics under the Equality Act 2010, particularly regarding the potential disruption of bringing together and redesigning services from across the two upper tier authorities of KCC and Medway and the aggregation of services from the District and Borough Councils into unitary councils. It ensures that equality considerations are embedded throughout the development and implementation of the new model, and that the voices of Kent's diverse population are reflected in the decision-making process.

	The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy proposals, service restructures, or operational changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation. It should also be noted that the decision to implement Local Government Reorganisation has been taken by the Minister of State for Local Government and English Devolution, who will also make the decision on the geographies for the new Unitary Councils. Whilst it is appropriate that equalities impacts are considered by local authorities in implementing these decisions, the decision on the geographies for the new Unitary Councils lies with the Minister of State.
Information and research: • Outline the information and research that has informed the decision. • Include sources and key findings. • Include information on how the decision will affect people with different protected characteristics.	All Kent Councils have engaged with a broad range of key stakeholders as part of the development of all business cases for Local Government Reorganisation (LGR). This included an open public survey, which was carried out between 9 September and 10 October 2025. The survey was a standardised resident survey, agreed by all Kent Councils, which looked to understand what was important to residents for the creation of new unitary councils. A total of 2,107 responses were received from residents across Kent and Medway. Stakeholder and Partner engagement has been ongoing since February 2025, for the interim submission in March 2025. The engagement has aimed to identify the key factors to consider in a reorganisation, along with the opportunities it could unlock, the problems it might solve, and the challenges it could introduce or fail to address. 50 written responses were received from a range of stakeholders included Police Force, Police and Crime Commissioner, Fire and Rescue, Health, Education, Voluntary Sector, Housing etc. Kent Councils also recognised the value of close collaboration with strategic partners and the opportunities presented by Public Sector Reform, leading to workshops with key stakeholders including Health, Police, Education, and the DWP; these sessions explored the options under consideration through open discussions about current system challenges, existing strengths to preserve and build upon, and the potential improvements LGR could bring. Both the survey and stakeholder engagement approach focused not on securing support for specific proposals, but on understanding the possible benefits, opportunities, concerns, and challenges associated with them. Swale Borough Council has also undertaken its own engagement workshops during this period with key stakeholder, including the VCSE and parish/town workshops. The Government has recently updated the Indices of Deprivation - English indices of deprivation 2025 - GOV.UK. Swale is ranked as the second most deprived borough in Kent. The Swale Corporate Equality Scheme provides details of key equalities data for the borough - Strategies and policies - Corporate Equality Scheme.
Consultation:	Formal consultation on the proposed options will be undertaken by Government in Spring 2026. The outcome of this consultation will

- Has there been specific consultation on this decision? - What were the results of the consultation? - Did the consultation analysis reveal any difference in views across the protected characteristics? - Can any conclusions be drawn from the analysis on how the decision will affect people with different protected characteristics?	feed into their decision around which option for LGR to formally implement. As part of the implementation phase for LGR, Swale Borough Council would consider the EQIA undertaken by Government and review and update our own document.
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Is the decision relevant to the aims of the equality duty?

Guidance on the aims can be found in the EHRC's PSED Technical Guidance -

<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance>

Aim	Yes/No
1) Eliminate discrimination, harassment and victimisation	Yes
2) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it	Yes
3) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it	Yes

Assess the relevance of the decision to people with different protected characteristics and assess the impact of the decision on people with different protected characteristics.

When assessing relevance and impact, make it clear who the assessment applies to within the protected characteristic category. For example, a decision may have high relevance for young people but low relevance for older people; it may have a positive impact on women but a neutral impact on men.

Characteristic	Relevance to decision High/Medium/Low /None	Impact of decision Positive/Negative/Neutral
Age	Medium	Kent and Medway have a diverse age profile, with notable concentrations of both younger and older residents. In Kent, approximately 22.4% of the population is aged 60 and over, while 23.5% is aged under 20. The largest age cohort is those aged 50–59, accounting for 14.5% of the total population. Kent also has a slightly higher proportion of both 0–14-year-olds and people aged over 50 compared to the national average, with a median age of 42.3 years. There is variation in the age profile across Kent's districts, for example, the average age in Folkestone and Hythe is 45 years, compared to 37.3 years in Dartford. Medway has a younger overall population, with 16.4% aged 60 and over and 24.6% aged under 20. The largest age group in Medway is those aged 50–64, making up 19.2% of the population. The median age in Medway is 38 years, which is younger than both the South East regional average and the national average. Within Swale, the 55-59 age group is the highest proportion of Swale population (7.1%), with the 90+ age group being the smallest (0.8%).

		LGR may disrupt long-standing care relationships for older adults and continuity of support for children and families. Changes in staffing, service models, or administrative processes could lead to temporary delays or reassignment of cases, affecting the stability and quality of care. Differences in service access, eligibility, and support models across areas may also result in unequal experiences for residents depending on where they live. For older people, particularly those in rural or coastal areas, there is a risk that changes to service structures could disrupt access to adult social care, health services, and community support. These services are often lifelines for older residents, and any transition period or reconfiguration could lead to confusion, delays, or reduced continuity of care. Similarly, younger people, especially those accessing SEND services or transitioning between children's and adult services, may be affected by changes in service pathways. The reorganisation could result in temporary disruption or uncertainty around eligibility, referral routes, or support mechanisms if integration is not handled with sufficient clarity and safeguarding. Digital transformation and centralisation of services, which are often associated with reorganisation, may disproportionately affect older residents who are less digitally literate or lack access to online platforms. This could lead to exclusion from information, engagement, or service access unless mitigated through inclusive design and alternative access routes. There is a risk of fragmentation in multi-agency safeguarding, care coordination, and placement arrangements, which could impact vulnerable individuals. Workforce pressures, uneven resource distribution, and demographic demand—particularly in areas with higher dependency ratios—may further challenge service delivery. The reorganisation may also have age-related implications for staff. Older staff may face concerns around job security, role changes, or redeployment, particularly if they are less mobile or nearing retirement. Younger staff, especially those early in their careers, may experience uncertainty around career progression or development opportunities. Without clear communication and support, these impacts could affect staff wellbeing, morale, and retention across age groups.
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		Mitigating measures would be implemented during the implementation phase of LGR to ensure services remain accessible, inclusive and responsive during transition and beyond. Maintaining consistency in service standards, eligibility criteria, and care pathways will be essential to reduce the risk of fragmentation, particularly in adults and children's social care (including SEND). Continuity plans will focus on protecting care arrangements and ensuring that service pathways remain coherent across organisational boundaries. Inclusive and more local service design will help mitigate the risk of digital exclusion, especially among older residents. Alternative access routes will be maintained, and digital transformation initiatives will be developed with accessibility in mind. Workforce transition plans will be inclusive and responsive to the diverse needs of employees across age groups. Demographic analysis will be embedded into planning processes to ensure services are responsive to the ageing population and the needs of children and young people. The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy proposals, service restructures, or operational.
Disability	Medium	In Kent, approximately 17.9% of the population is classified as disabled under the Equality Act, with a further 10.2% claiming disability-related benefits. The majority of these claimants report physical health conditions, followed by mental health and learning difficulties. The proportion of residents classified as disabled under the Equality Act varies across Kent's districts. Thanet has the highest rate, with 22.9% of its population reporting a disability, followed by Folkestone & Hythe (21.8%), Dover (21.2%), Canterbury (19.6%), and Swale (19.5%). These districts, primarily located in East Kent, all exceed the Kent average of 17.9%. In contrast, Dartford has the lowest proportion at 14.0%. In Medway, approximately 12.1% of the population is classified as disabled under the Equality Act. Within Swale, 19.5% of residents in Swale have a limiting long term illness - this is above the Kent average (17.9%), the South East (16.1%), and England and Wales (17.5%) averages. The initial process of reorganisation may temporarily interrupt services due to staffing

		changes, IT issues, or the need to reconfigure contracts and delivery models. For people with physical disabilities, changes to service locations or formats could introduce barriers to access, particularly if physical infrastructure or transport links are not adequately considered. Each new unitary may adopt different policies, eligibility criteria, or funding levels, which could affect capacity and consistency in service provision. For those with learning disabilities or mental health conditions, transitions in service structures may lead to confusion, anxiety, or disruption in care continuity. Clear communication, safeguarding, and co-designed pathways will be essential to ensure that these groups are not disadvantaged during or after reorganisation. For specialist services that support different disability groups, economies of scale may be lost when breaking up county-wide contracts or shared services. This could result in disruptions to the services some residents receive or an overall reduction in quality due to cost-cutting measures. Digital transformation, while offering efficiencies, may risk excluding individuals with cognitive impairments or those who rely on assisted technologies. Without inclusive design and alternative access routes, there is a risk of digital exclusion. Functions such as public health, safeguarding, highways, or emergency planning may suffer from reduced coordination across newly defined boundaries. Opportunities to learn and share best practice on how to design services that meet specific needs might be lost or harder to share, potentially limiting improvements in care or access to new support options. Staff with disabilities may experience specific concerns during the transition, including uncertainty around whether existing reasonable adjustments will be honoured, how inclusive the new structures will be, and anxieties about joining new teams or disclosing personal information. For staff with physical disabilities, changes to office locations or layouts could introduce challenges to access, particularly if physical infrastructure is not adequately considered Clear and consistent communication will be a focus, particularly for individuals with learning disabilities, cognitive impairments, or mental health conditions. Easy-read materials, alternative formats, and trusted communication channels will be used to help residents understand changes and navigate new service pathways.
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		Continuity planning will be embedded into service redesign, with a focus on safeguarding vulnerable individuals. Digital transformation initiatives will be developed with accessibility in mind. Workforce transition planning will include consideration of reasonable adjustments, and support through clear communication. The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy proposals, service restructures, or operational changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation.
Gender reassignment	Medium	As data systems are migrated and reconfigured, there is an increased risk that sensitive information related to a resident's transition may be mishandled. This includes the potential for pre-transition data to be used inappropriately, leaked, or lost, which could compromise privacy and dignity. If specific support services linked to transitioning are disrupted during the reorganisation, transgender individuals may experience gaps in care or delays in accessing vital support. Maintaining continuity and safeguarding in these services is critical. Transgender staff may face heightened concerns during organisational change, including anxieties about disclosing their identity to new colleagues, how their gender will be respected in new systems and teams, and whether existing adjustments or support will be maintained. The new unitary councils would ensure that all policies and practices remain compliant with the Equality Act 2010, which provides protection for individuals with the protected characteristic of gender reassignment. Staff would be reminded of their responsibilities to treat all residents with respect and to maintain confidentiality regarding personal information. Any concerns raised by service users or staff will be addressed through the appropriate complaints and feedback mechanisms. The new unitary councils would ensure that transgender staff are supported throughout the transition, with clear policies on respectful treatment, confidentiality, and continuity of any existing adjustments or support arrangements.

		The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy proposals, service restructures, or operational changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation.
Marriage and civil partnership	None	N/A
Pregnancy and maternity	Medium	In Kent and Medway, maternity and early years services support a significant number of residents each year, with demand influenced by local birth rates and population growth. Pregnant women and new parents often require timely, flexible, and locally accessible support across health, housing, and social care services. During the initial stages of reorganisation, service disaggregation could lead to gaps in care, particularly in the transition from pregnancy to postnatal services. This may affect coordination with NHS partners and reduce the quality or continuity of care for some residents. Variations in maternity support policies, childcare funding, and access to parenting programmes across different authorities may result in unequal support for new and expectant parents. Disruption to services such as health visiting, perinatal mental health, housing, and social care could disproportionately affect those with this protected characteristic. Workforce changes may impact pregnant staff or those on or returning from maternity leave, especially in frontline health and care roles where women are overrepresented. Concerns may arise around redeployment, job security, and the continuation of reasonable adjustments or flexible working arrangements. Service redesign would consider maternity and early years pathways, including perinatal mental health, health visiting, and housing support. This would help ensure that services remain responsive to the needs of pregnant individuals and new parents, and that any transition does not disrupt access to essential care. Workforce planning would take into account the needs of pregnant staff and those either on or returning from maternity leave, particularly in frontline roles where women are overrepresented. The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy proposals, service restructures, or operational

		changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation.
Ethnicity	Medium	In Kent, 89.1% of residents identified as White in the 2021 Census, with Asian or Asian British residents making up 5.4%, Black or Black British 2.1%, Mixed or Multiple ethnic groups 2.6%, and Other ethnic groups 0.8%. In Medway, the population is slightly more diverse: 84.3% identified as White, 5.9% as Asian or Asian British, and 5.6% as Black, Black British, Caribbean or African. These figures reflect growing ethnic diversity, particularly in urban areas such as Medway, Gravesham, and parts of North Kent. Within Swale, the white ethnic group is the largest (89%). Of these, 93.8% are White English, Welsh, Scottish or Northern Irish; 0.6% are Irish, 0.6% are Gypsy or Irish Traveller; and 4% are from other white ethnic groups. Residents from ethnic minority groups account for 11% of Swale residents, and the Borough has the second lowest number and proportion of residents from an ethnic minority group in Kent. Ethnic minority groups in Swale consist of mixed/ multiple ethnic groups (1.8%), Asian/ British Asian (1.5%), Black/African/Caribbean/Black British (2.3%); and other ethnic groups (0.5%). There is a risk that service reorganisation could disrupt access to culturally appropriate services, particularly in areas such as health, education, housing, and community safety. For example, changes to local engagement structures or staff redeployment could weaken trusted relationships between communities and service providers, especially in areas with established community networks. Language barriers, digital exclusion, and experiences of discrimination may also compound the impact of any disruption. In households where English is not the first language, there is a risk that access to interpreting, translation, or culturally appropriate services may become inconsistent if not prioritised across new unitary councils. This could lead to unequal access to essential information and support. There may also be challenges if existing centralised equality infrastructure is disrupted during reorganisation. This includes the potential loss of coordinated anti-racism initiatives, shared expertise, and mechanisms that previously supported inclusive practice across wider service areas.

		Minority ethnic staff may face anxieties during the transition, including concerns about how equality and inclusion will be upheld in new teams, whether cultural awareness will be maintained, and how they will be treated within unfamiliar organisational structures. Local engagement mechanisms would be used to ensure communities can raise concerns and help shape services. Clear and inclusive communication would be considered to ensure all residents can understand and access services—particularly those facing language barriers. Workforce transition planning would include measures to uphold inclusive practices and cultural awareness within new teams. The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy proposals, service restructures, or operational changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation.
Religion or belief	Medium	In Kent, the 2021 Census shows that 50.7% of residents identified as Christian, while 39.1% reported no religion. Other religious groups included Muslim (1.2%), Hindu (0.5%), Sikh (0.2%), and Buddhist (0.3%). In Medway, the religious profile is similar, with 48.3% identifying as Christian, 41.4% reporting no religion, and 6.1% identifying with other faiths, including Muslim (2.2%), Hindu (0.6%), and Sikh (0.3%). These figures reflect a growing diversity in religious affiliation, alongside a significant proportion of residents who do not identify with any religion. Religious affiliation varies notably across Kent's districts. Gravesham has the highest proportion of Sikh residents (8%), while Dartford has the highest proportion of Hindu residents (3.8%) and a relatively high Muslim population (3.5%). In contrast, districts such as Sevenoaks and Swale have higher proportions of residents identifying as Christian (51.8% and 47.2% respectively) and lower representation of minority faiths. The proportion of residents reporting no religion is highest in Swale (45.3%) and Thanet (44.1%), indicating a more secular population in those areas. In Medway, 45.1% of residents identified as Christian, while 43% reported no religion. Other religious groups included Muslim (2.7%), Hindu (1.1%), Sikh (1.6%), Buddhist (0.4%), and Jewish (0.1%).

		In Swale, the highest proportion of people (47.2%) state their religion as Christianity – this is slightly higher than the Kent average. After no religion (45.3%), a greater proportion of people in Swale state they are Muslim (1.0%) than any other religion. Service reorganisation may disrupt access to faith-sensitive services such as culturally appropriate healthcare, burial arrangements, and community safety initiatives. If these services are not consistently prioritised across new structures, some faith communities may experience reduced accessibility or delays in support. Changes to local engagement structures or staff redeployment may weaken established relationships with faith-based organisations that play a vital role in supporting vulnerable residents. This could affect the flow of local intelligence and reduce the effectiveness of referral pathways that help connect individuals to appropriate services. There is a risk that the specific needs of faith communities may become less visible during the transition, particularly if engagement mechanisms are not maintained or adapted to reflect new governance arrangements. Without strong local engagement, religion and belief-related priorities may not be fully reflected in service planning or delivery. While it may be difficult to quantify the full extent of these impacts, faith communities often provide essential support to older people, newly arrived populations, and those experiencing social isolation. As implementation progresses, careful consideration should be given to how engagement with faith groups is sustained and strengthened across all areas. Service redesign would include consideration of faith-sensitive needs, particularly in areas such as healthcare, bereavement services, education, and community safety. Local engagement mechanisms would be strengthened to maintain and build relationships with faith-based organisations. These organisations play a vital role in supporting vulnerable residents and providing local insight. Communication materials and consultation processes would be designed to be inclusive and accessible. Where appropriate, translated materials and culturally appropriate outreach would be used to support engagement with diverse faith communities and ensure that all residents can understand and access services.
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		The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy proposals, service restructures, or operational changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation.
Sex	Medium	In Kent and Medway, the population is broadly balanced by sex, with a slight majority of females, particularly in older age groups. Women are more likely to live longer, experience disability in later life, and take on unpaid caring responsibilities. Men, meanwhile, are statistically more likely to experience poorer mental health outcomes and lower engagement with preventative health services. These differences in lived experience and service interaction mean that changes to service structures may have distinct impacts based on sex. Within Swale, 50.4% of the population are female and 49.6% are male. For women, particularly those accessing adult social care, domestic abuse support, or maternity services, there is a risk that service reconfiguration could disrupt continuity to gender-sensitive provision, particularly during the transitional stage. Women are also more likely to be employed in frontline care roles, meaning workforce changes could disproportionately affect female staff. For men, there is a risk that changes to public health and mental health services could further reduce engagement, particularly if services are not designed to address known barriers such as stigma or low help seeking behaviour. Ensuring that services remain inclusive and responsive to male health needs will be critical. Services will remain responsive to the distinct needs of women and men, and ensure that any transition does not disrupt access to critical support. Workforce planning will take into account the gender profile of staff, especially in sectors such as social care and education where women are disproportionately represented and in areas such as waste management, transport, and certain technical services where men may be overrepresented. Measures will be taken to support staff through organisational change. The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy

		proposals, service restructures, or operational changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation.
Sexual orientation	Medium	In Kent and Medway, the majority of residents aged 16 and over identified as straight or heterosexual in the 2021 Census. In Medway, 89.7% of respondents identified as straight or heterosexual, while 3% identified as lesbian, gay, bisexual, or another sexual orientation (LGB+), and 7.3% chose not to answer the question. Across Kent's districts, the proportion of people identifying as straight or heterosexual ranged from approximately 89% to 91%, with between 2.5% and 3.5% identifying as LGB+, and 6% to 8% not responding to the question. These figures are based on data published by the Office for National Statistics at local authority level. There are potential risks associated with how voluntary, community, and faith sector partners are engaged during reorganisation, particularly those providing support related to sexual orientation. Any disruption to funding streams, service coordination, or partnership working may have knock-on effects for LGBTQ+ residents who rely on these services. Service reorganisation could also affect access to LGBTQ+ inclusive services, especially in areas such as mental health, housing, youth support, and community safety. If trusted relationships with specialist providers or community organisations are not maintained, residents may experience reduced support or feel less confident in accessing services. LGBTQ+ staff may experience concerns during the transition about joining new teams, how inclusive the new working environment will be, and whether they will feel safe and supported in disclosing their identity or maintaining existing support arrangements. Service redesign would consider services that LGBTQ+ residents' access, particularly in areas such as mental health, housing, youth services, and community safety. Communication materials would be reviewed to ensure they are respectful and inclusive. Workforce planning would consider the needs of LGBTQ+ staff, including ensuring inclusive team cultures and safeguarding the ability of individuals to disclose their identity safely and confidently within new organisational settings.

		The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy proposals, service restructures, or operational changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation.
Other socially excluded groups ¹	Medium	Carers In Kent, 135,895 people (9.1% of the population) reported providing unpaid care in the 2021 Census, with 43,166 individuals (31.8%) delivering 50 or more hours of care per week. In Medway, 24,113 people (8.6%) identified as unpaid carers, with 7,582 individuals (31.4%) providing 50 or more hours of care per week. Carers may experience unequal access to support depending on how services are configured across different authorities. This includes potential variation in access to breaks, assessments, financial support, and eligibility criteria, which could lead to postcode-based inequalities. During the transition, carers, especially those with limited digital access or complex caring roles, may struggle to find or access help. Disruption to services such as respite care, carers' assessments, or crisis support could increase stress and reduce their ability to sustain their caring responsibilities. Carers' needs may be underrepresented in planning if data on caring responsibilities is not consistently captured or considered. This may particularly affect hidden or informal carers, who often face barriers to engagement and visibility in service design. Staff with caring responsibilities may face additional pressures during the transition, particularly if changes to roles, teams, or working patterns reduce flexibility or disrupt existing support arrangements. Without careful planning, this could impact their ability to balance work and caring duties effectively. Service redesign would consider carer pathways, particularly in areas such as respite care, carers' assessments, and crisis support. This would help ensure that services remain responsive to the needs of unpaid carers and that any transition does not disrupt access to essential support. Workforce planning would take into account the dual role of staff who also have caring

		responsibilities, and measures would be taken to support staff through organisational change. The EqlA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqlAs will be undertaken as specific policy proposals, service restructures, or operational changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation.
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Conclusion: - Consider how due regard has been had to the equality duty, from start to finish. - There should be no unlawful discrimination arising from the decision. Advise on the overall equality implications that should be taken into account in the final decision, considering relevance and impact.	The transition from a two-tier system to a single-tier structure of multiple unitary councils presents a range of opportunities to improve public services and outcomes for all communities, including those with protected characteristics. LGR supports more integrated and efficient service delivery, enhances local accountability, and enables more inclusive governance. It also strengthens place-based planning, promotes digital transformation, and facilitates the sharing of best practice. LGR enables a strategic opportunity to advance public service reform with a whole-system approach to service delivery, fostering stronger integration both within council services and with external partners such as health and social care. For example, aligning Adult Social Care with Housing, or Children's Services with Housing Services, can lead to more coordinated and inclusive support for residents. The establishment of new unitary authorities is intended to preserve local identity while embedding community voices in governance and service design. This includes ensuring that underrepresented and marginalised groups are actively involved in decision-making processes. The modernisation of systems, including the digitisation of services and the development of data and evidence hubs, will enhance operational efficiency and support more informed, equitable service design. By aggregating services across areas such as education, housing, skills, and employment, councils will be better positioned to develop holistic strategies that respond to the diverse needs of individuals. LGR also strengthens place-shaping capabilities, allowing for more integrated planning of infrastructure and services that reflect the character and requirements of local communities. Improved accessibility to council services is another anticipated benefit, particularly for residents in geographically larger or more diverse areas. The new structure will also facilitate the sharing of knowledge and best practice across Kent and beyond, promoting innovation and continuous improvement. Finally, the design of governance arrangements that reflect the diversity of Kent's population is expected to enhance local accountability and build trust between councils and the communities they serve.
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¹ Other socially excluded groups could include those with literacy issues, people living in poverty or on low incomes or people who are geographically isolated from services, affected by rural deprivation or poor health.

- Having 'due regard' is a state of mind. It should be considered at the inception of any decision.
- Due regard should be considered throughout the development of the decision. Notes should be taken on how due regard to the equality duty has been considered through research, meetings, project teams, committees and consultations.
- The completion of the EIA is a way of effectively summarising the due regard shown to the equality duty throughout the development of the decision. The completed EIA must inform the final decision-making process. The decision-maker must be aware of the duty and the completed EIA.

Full technical guidance on the public sector equality duty can be found at:

<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance>

Please send the EIA in draft to Janet Dart in the Comms and Policy Team (janetdart@swale.gov.uk) who will review it with colleagues and let you have any comments or suggested changes.

This Equality Impact Assessment should form an appendix to any EMT/DMT, service committee or Council report relating to the decision, and a summary should be included in the 'Equality and Diversity' section of the standard committee report template under 'Section 6 – Implications'.