

**DEVOLUTION AND LOCAL GOVERNMENT RE-
ORGANISATION CABINET COMMITTEE**

Monday, 23rd March, 2026

2.00 pm

Council Chamber





AGENDA

DEVOLUTION AND LOCAL GOVERNMENT RE-ORGANISATION CABINET COMMITTEE

Monday, 23 March 2026 at 2.00 pm
Council Chamber, Sessions House, County Hall,
Maidstone.

Ask for: **James Clapson**
Telephone: **03000 417387**

Membership (17)

Reform (10):	Mr M Harrison (Chair), Mrs S Emberson (Vice Chair), Mr M Brown, Mr W Chapman, Mr P Chamberlain, Mr J Eustace, Mr J Henderson, Mr M Paul, Mr T Mole, Ms P Williams.
Labour (1):	Mr A Brady
Liberal Democrat (2):	Mr M Ellis and Mr A J Hook
Green (1):	Mr M Hood
Conservative (1):	Mr H Rayner
Independent Group (1)	Vacancy
Independent Reformers (1)	Vacancy

UNRESTRICTED ITEMS

(During these items the meeting is likely to be open to the public)

- 1 Apologies and Substitutes
- 2 Declarations of Interest
- 3 Minutes of the meeting held on 3.11.2025 (Pages 1 - 6)
- 4 Local Government Re-organisation Update (Pages 7 - 14)
- 5 Update on Kent and Medway LGR Implementation Preparation (Pages 15 - 26)
- 6 KCC Service Preparation (Pages 27 - 32)
- 7 Local Government Reorganisation: Governance Overview (Pages 33 - 40)

- 8 KCC Draft Corporate Risk - Local Government Reorganisation (Pages 41 - 48)
- 9 KCC's Response to the Government LGR Consultation (Pages 49 - 70)
- 10 Work Programme (Pages 71 - 72)

EXEMPT ITEMS

(At the time of preparing the agenda there were no exempt items. During any such items which may arise the meeting is likely NOT to be open to the public)

Benjamin Watts
Deputy Chief Executive
03000 416814

Date: 13/3/2026

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KENT COUNTY COUNCIL

DEVOLUTION AND LOCAL GOVERNMENT RE-ORGANISATION CABINET COMMITTEE

MINUTES of a meeting of the Devolution and Local Government Re-organisation Cabinet Committee held in the Council Chamber, Sessions House, County Hall, Maidstone on Monday, 3 November 2025.

PRESENT: Mr M Harrison, Mr A Brady, Mr M Brown, Mr P Chamberlain, Mr W Chapman, Mr M Ellis, Ms S Emberson, Mr J Eustace, Mr J Henderson, Mr C Hespe, Mr M A J Hood, Mr H Rayner, Mr M J Sole (Substitute for Mr A J Hook), and Mrs P Williams.

IN ATTENDANCE: Ms L Kemkaran and Mr S Jeffery.

OFFICERS: Amanda Beer (Chief Executive), Jenny Dixon-Sherreard (Strategy Manager), Dave Shipton (Head of Financial Strategy), Paul Royel (Director of Human Resources & Organisation Development), Matt Wagner (Chief Analyst), Ben Watts (Deputy Chief Executive), David Whittle (Director for Strategy Policy Relationships & Corporate Assurance), Tim Woolmer (Head of Strategic Partnerships), and James Clapson (Democratic Services Officer).

UNRESTRICTED ITEMS**13. Apologies and Substitutes**
(Item 1)

Apologies were received from Mr Hood who was substituted by Mr Sole.

14. Declarations of Interest
(Item 2)

There was a general declaration of interest noted from all Committee Members who were also District, City or Brough Councillors, namely; Mr Brown, Mr Sole, Mr Ellis, Mr Hood and Mr Brady.

15. Minutes of the meeting held on 30.09.2025
(Item 3)

RESOLVED that the minutes be signed by the Chair as a correct record of the meeting.

16. Interim report on KCC's public survey on LGR
(Item 4)

1. Mr Wagner presented the report, during which he made the following key points:
 - a. The results of the Local Government Reorganisation (LGR) Residents Survey would be shared with the other 13 Kent and Medway Authorities.
 - b. The final results aligned with the findings of the partial results that were before the Committee.
 - c. The executive summary provided an overview of the findings that were grouped into the following four headings:
 - Options on LGR and council size,
 - Belonging and connections,
 - What residents want,
 - Views on cost implications.
2. The following comments were made by the Committee during consideration of the item:
 - a. The survey could have been an opportunity to assess public appetite for devolution in Kent.
 - b. The inter-district connections matrix indicated that option 1a would draw some communities don't feel a strong connection to each other.
 - c. It was a shame that more young people had not engaged with the survey as they would be the ones most affected by LGR in the long term.
3. The administration provided the following responses to questions raised:
 - a. The Kent Leaders had commissioned a survey, however KCC conducted its own survey to gather responses about finances and council tax.
 - b. Only 32% of respondents disagreed that minimising council tax increases should be the most important consideration.
4. The Officers provided the following responses to questions raised:
 - a. The survey did not include questions relating to devolution because there was not a timetable or plans for devolution in Kent at this time. The intention was for the survey to focus specifically on LGR.
 - b. Option 1a would not be compliant with the Government's devolution policy position which required multiple authorities to come together. The Council would need to seek devolution powers through a different means.
 - c. The sample size generated a margin of error of around 3 percent.
 - d. The number of respondents compared well to other KCC surveys.
5. RESOLVED that the Cabinet Committee note the views expressed by the respondents of the survey, and that they will be included in KCC's final business case to Government.

17. KCC's draft Strategic Business Case for LGR
(Item 5)

1. Mr Whittle presented the report, during which he made the following key points:
 - a. Thanks were offered to everyone involved in preparing the business case in such a short time scale.
 - b. The Secretary of State indicated that all proposals should have a shared evidence base to allow for easier comparison between the options. This has been achieved in Kent and Medway but has not always been achieved elsewhere in the Country.
 - c. Kent County Council (KCC) decided to develop its business case internally because the Council wished to approach the task from a different angle to the other 13 authorities.

- d. The business case was not designed to be an implementation plan or act as an operating model for a new council. It was intended to allow the proposal to be compared against the other proposals.
 - e. The Government would ultimately decide how LGR would take place within Kent.
2. The Chair permitted Mr Jeffery to address the Committee about the item. During his address he wished for more information on why an option was being proposed that did not meet the Government's requirements for devolution.
3. The following comments were made by the Committee during consideration of the item:
 - a. The proposal to have a single unitary authority was not compatible with the current requirements for devolution.
 - b. The current KCC model has seen levels of debt increase, it seems that a single unitary authority might continue along this path of increasing costs. A different approach was needed.
 - c. Area assemblies were not legally constituted and could be disbanded by the unitary authority. Decision making ultimately remained with the unitary authority.
 - d. 118 Councillors may not be sufficient to adequately represent residents.
 - e. The workload would be significant for the Councillors as it would include both Country and District Council matters. The £23,000 allowance would be insufficient to allow Councillors to work full time on the role. Councillors were more likely to be older and retired or semi-retired which would make them less representative of their constituents.
 - f. It would be more difficult for independent candidates to successfully stand due to the logistics of canvassing a large area.
 - g. The proposal put forward showed that there would be cost savings in the future.
 - h. It was possible that the Fair funding Review 2.0 could be less generous for rural areas, this could result in a less of funding for Kent.
 - i. The risks and costs of disaggregation of services increases as the number of unitary authorities increases.
 - j. Multiple small unitary authorities were unlike to achieve service cost savings if they could not already be achieved by KCC at a county scale.
 - k. The proposal would create a democratic deficit with less people making decisions for more people.
 - l. There was no indication of how enhanced community engagement would take place.
4. The administration provided the following responses to question raised:
 - a. Although the proposal did not meet the Government's current requirements for devolution, the area assemblies would help to facilitate a local connection with communities.
 - b. A single unitary authority was felt to be an appropriate body that would have the capacity to accept devolved powers and resources if they were passed down from the Government.
 - c. The business case showed that the single unitary authority proposal combined strategic capability through its size and local representation through the area assemblies. It offered value for money, met the Government's criteria for LGR, reflected the uniqueness of Kent, and had significantly less disaggregation complications than any other proposal.
 - d. There could be some efficiencies generated from having multiple departments working together under one authority, however, there was already very close partnership working. These efficiencies were difficult to quantify at this stage because the joint working policies and strategies of the new authority were not in place.

5. The Officers provided the following responses to questions raised:
 - a. The figures included in the report did not make any assumptions about the findings of the Fair Funding Review 2.0. Once the information was available for the existing authorities, the models could then be applied to the different proposals.
 - b. The ability of the authorities to service their debt was more important than the amount of debt each held. The costs of the LGR transition and the servicing of existing debts would need to be met through existing budgets and reserves. No additional money was expected from the Government to fund transition costs.
 - c. The Government's devolution policy was clear, however, there was no timetable for further rounds of devolution for two-tier areas.
 - d. No modelling had been undertaken to establish exactly how many Councillors would be needed for any of the proposals.
 - e. There would be a need for any new unitary authority to harmonise council tax charges within eight years.
 - f. There were currently 658 councillors across Kent and Medway; combined, they received around £5.1million in basic allowances each year. The single unitary authority proposal used an indicative basic allowance rate for councillors of £23,000, totalling around £2.7million per year, however it would be for the new authority to agree and set the remuneration rates for its Councillors.
 - g. The business case acknowledged that the Councillors would have a larger role. There would be a need for enhanced support arrangements to help manage workloads, such as support staff and the usage of technology to maximise efficiency.
 - h. The indicated cost savings were felt to be reasonable and achievable. The implementation plan would provide more details around the costings and savings that could be expected.
 - i. Some shared service arrangements could be put in place across multiple unitary authorities which may help to reduce cost and disruption if the devolution process was initiated. This would be a decision for any new authority to make.
 - j. Time scales remained tight and work would continue to prepare for the next steps with the 13 partner authorities, without prejudging the Government's decision.
6. RESOLVED that the Cabinet Committee note proposed decision to approve and submit KCC's Strategic Business Case for Local Government Reorganisation in Kent and Medway

18. Update on the Kent and Medway joint process for LGR business case development
(Item 6)

1. Mr Woolmer presented the report and advised that after the submission, the Kent Leaders would continue to work together to prepare for the Government's decision and the actions that would need to be taken afterwards.
2. The following comments were made by the Committee during consideration of the item:
 - a. The proposal of a single unitary model did not seem to align with the intentions of LGR.
 - b. To submit a proposal that did not have support from any of the other 13 authorities would be a unilateral action that could not be described as collaborative working.

3. The administration provided the following responses to questions raised:
 - a. The administration did not feel that LGR was necessarily required for Kent, however Option 1a was the best option for the people and business in Kent.
 - b. A number of the Authorities would also be submitting the proposal that they felt was the best for their residents. None of the options had universal support from all 14 Kent and Medway Authorities.
 - c. Some of KCC's partners felt that a single unitary would be best for the area.
4. RESOLVED that the Cabinet Committee note the continued collaborative working between all 14 Councils in Kent and Medway, the progress made on the business case development and the commitment to continue working closely together up to 28 November 2025 submission date and beyond

19. Work Programme
(Item 7)

1. RESOLVED to note the work programme.

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From: Linden Kemkaran, Leader
Amanda Beer, Chief Executive

To: **Devolution and Local Government Reorganisation Cabinet Committee, 23 March 2026**

Subject: LGR update

Classification: **Unrestricted**

Summary:

This paper provides an update on national Local Government Reorganisation (LGR) developments since the previous Cabinet Committee on 3 November 2025. It also presents Government's current timetable for the LGR process and considers some potential scenarios if there are changes to the key milestones.

Recommendation:

The Cabinet Committee is asked to:

- (1) **Note** and **comment** on this update
-

1. Introduction

1.1. This paper provides an update on national Local Government Reorganisation (LGR) developments since the previous Cabinet Committee on 3 November 2025. This covers:

- An overview of recent government LGR announcements and activity
- Devolution Priority Programme (DPP) areas & Surrey (LGR 'fast track')
- A recap of the current timetable for LGR.

2. Overview of recent Government LGR announcements and activity

- **10 March** – The Surrey Structural Changes Order (SCO) came into force. The letter formally notifying Surrey Leaders includes an accompanying guidance note on the roles of implementation bodies and predecessor councils.
- **February to March** – all non-DPP LGR submission proposers have either had, or have, a 'listening meeting' scheduled with MHCLG officials to talk through their plans.
- **25 February** – The MHCLG has set up a 'Local Government Reorganisation (LGR) Advisory Group' to support the delivery of the reorganisation programme.

- **16 February** - The Secretary of State for Housing, Communities and Local Government, wrote to council Leaders in LGR areas about the cancelling of the postponement of the May local elections in several local authority areas. Kent was not part of this arrangement. The MHCLG Minister's Miatta Fahnbulleh and Matthew Pennycook recently said in a letter to Leaders and Chief Executives that the government '*remain fully committed to delivering these important reforms within this Parliament to the timetable set out*'. At the same time as the announcement on the local elections, the MHCLG announced £63 million in additional capacity funding to the 21 local areas undergoing reorganisation - the detail of this has not yet been published.
- **12 February** - The MHCLG wrote to all council areas not in receipt of devolution, inviting them to submit an Expression of Interest (EoI) by 20 March to form a Foundation Strategic Authority (FSA). The MHCLG have said that LGR and devolution could be worked on concurrently.
- **5 February 2026** - The government announced the launch of the respective statutory public consultations, including on the proposals received for local government reorganisation in Kent and Medway. All submitted proposals from across the 14 areas are being consulted on, and the MHCLG will only formally assess the submissions and give advice to the Minister after the consultation has closed.
- **28 November** - Final proposals for LGR across the 14 areas not on the Devolution Priority Programme (DPP) (now referred to as 'Tranche 3') were submitted to the Ministry of Housing, Communities and Local Government (MHCLG). This includes the five proposals from councils in Kent and Medway.
- **19 November 2025** - The Minister of State for Local Government wrote to Leaders of all councils in LGR areas that they 'need to adhere to the Publicity Code while developing and pursuing LGR proposals'.

2. Devolution Priority Programme (DPP) areas & Surrey (LGR 'fast track')

DPP areas

- 2.1 The statutory consultations on proposals for unitary local government in the six DPP areas (now referred to as 'Tranche 2') (East Sussex and Brighton and Hove, and West Sussex; Essex, Southend-on-Sea and Thurrock; Hampshire, Isle of Wight, Portsmouth and Southampton; Norfolk and Suffolk) took place from 19 November 2025 to 11 January 2026. It was anticipated that the DPP areas would have submitted comments on their draft Structural Change Order (SCOs) – the legal mechanism for forming the new unitary councils - by now. The Ministerial decisions for DPP areas are expected before the pre-election period (as known as 'purdah') for local authority local elections, which will be no later than 30 March.

Surrey 'fast track' area

- 2.2 Surrey County Council is the sole 'fast track' LGR area, with an accelerated timetable (now referred to as 'Tranche 1'). As such what is happening in Surrey is viewed as a model for what could happen in other areas – DPP and Non-DPP. Consequently, to aid the Committee, the following sections (2.4 to 2.10) briefly detail the implementation structures Surrey has put in place to manage their LGR processes.
- 2.3 The Surrey [SCO](#) became law on 10 March. Surrey's elections to the new shadow councils are in May 2026, with the new councils going live in April 2027. Surrey is currently in their implementation phase. The Local Government Minister and SCO state that 'throughout the whole [LGR] process all councils must be involved' in the implementation of the new councils. Once the SCO comes into force, it will be a statutory requirement for the current councils in Surrey to develop an *Implementation Plan* that supports transition to unitary local government.
- 2.4 The government nominated the Chief Executive of Surrey County Council as the 'Implementation Team Leader' and 'Senior Responsible Officer' (SRO) for LGR implementation in Surrey. This is specified in the SCO.
- 2.5 To facilitate good governance, Surrey voluntarily put in place two Joint Committees in January this year, one each for the two new unitary councils. The Committees are also referred to as '*Implementation Bodies*'. This voluntary arrangement was in advance of the Committees becoming mandatory when their SCO was approved by Parliament. Each of these Committees comprises Members from Surrey County Council and Districts and Borough Councils. The Committees are responsible for:
- overseeing development of the Implementation Plan
 - preparing draft constitutions and governance frameworks for the new councils
 - recommending interim statutory appointments to the shadow authorities
- The Committees will be dissolved and replaced by a new, different implementation body made up of the members elected in the inaugural elections to the new unitary council.
- 2.6 The Implementation Team Leader is responsible to the Joint Committees and later the Shadow Councils for the work of the Implementation Team (rather than the predecessor councils).
- 2.7 Surrey's '*Implementation Team*' drives the day-to-day officer leadership for executing the Implementation Plan to transition to the new unitary councils. This includes:
- Providing a Programme Management Office (PMO) and supporting officer governance to prepare the Implementation Plan
 - Working towards Day 1 readiness for the new unitary councils to function from 'Vesting Day'
 - Supporting appointments to leadership roles in the new authorities

- Managing aggregation and disaggregation of services
- Identifying and managing other risks
- Supporting governance and legal processes

2.8 The 'Implementation Team' acts as the '*Implementation Programme Board*'. The Board oversees the programme design and delivery (structure and governance). The Chief Executive of Surrey County Council (as Implementation Team Lead/SRO) chairs the Board. Membership of the Board includes all council Chief Executives, theme sponsors (where these are not Chief Executives), Commissioners and the Programme Director.

Officers appointed onto the Implementation Team are those with the expertise and experience required for the appropriate oversight of a safe and legal LGR transition. Prior to the formation of the Implementation Team, the joint Surrey Chief Executives group mandated that any LGR work had to be commissioned through them.

2.9 The *Programme Management Office* (PMO) coordinates programme governance, planning, and delivery assurance. The PMO is overseen by the Programme Director.

2.10 The work of the Implementation Programme Board is organised into *thematic areas*. This is intended to support effective programme governance and delivery, not infer a future structure for the new councils. Each theme is sponsored by a Chief Executive or Senior Officer of one of the current councils and supported by a series of workstream/SME leads who co-ordinate working groups involving subject matter experts from each of the councils (where appropriate and as needed). The themed areas are Adults, Children's, Housing and Communities, Place, Finance & property, Procurement and Contracts, People and Governance, Customer and Corporate Services, IT and Data. Several time-limited workstreams also report into the Implementation Team/ Board.

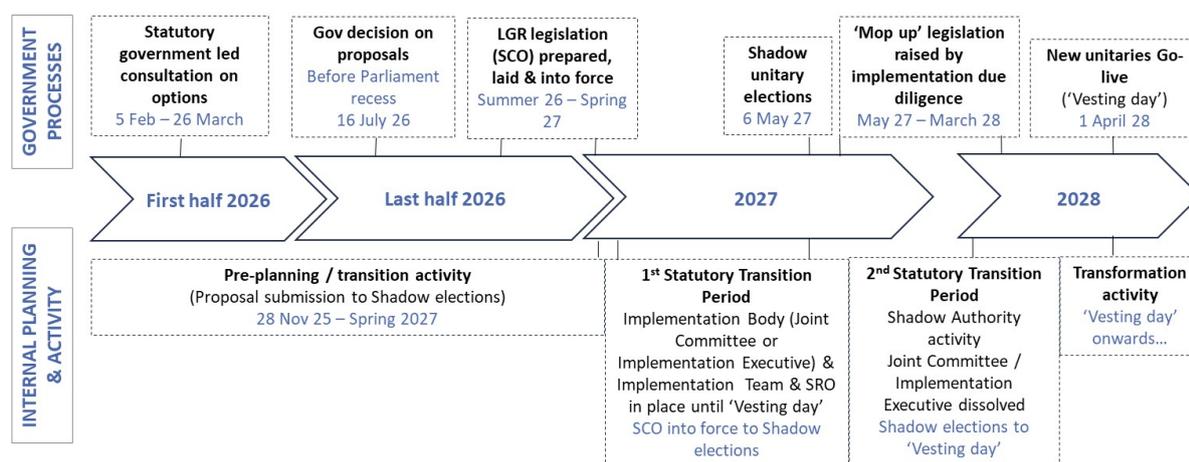
2.11 Additionally, around 40 '*workstreams*' also exist. All Chief Executive's recommended officers as a lead and deputy lead for these, and staff have been redesignated in roles which gave them a role very early on, so they had some agency.

2.12 Surrey's existing, predecessor, councils will continue to operate and have legal competence, independence and authority throughout the transition period. They will deliver business-as-usual (BAU) services and prepare for the transfer to new unitary councils.

2.13 A key message from Surrey is their immediate focus is on transition, and they are trying to avoid blurring *transition* with *transformation*, as that is for the successor councils to determine.

3. The current timetable for LGR

3.1 The letter from the Minister of State for Local Government and English Devolution inviting all councils in Kent and Medway to reorganise, sent on 5 February 2025, and the government’s summary of the LGR process, from 25 July 2025, detail the stages and timescales for LGR. The diagram below summarises the high-level government processes and timelines and the internal processes within Kent County Council.



4. Potential scenarios if the LGR timetable changes

- 4.1 At the agenda planning meeting, Members asked officers to include the following 'what if' scenarios, given the uncertainties arising from the Government’s decision to reinstate regular elections in 2026 in some areas undergoing LGR.
- 4.2 **Scenario 1: Government does not decide on non-DPP areas in July but holds Vesting Day to April 2028:** MHCLG misses its summer recess target for announcing decisions on non-DPP areas (including Kent and Medway) but publicly reaffirms commitment to the April 2028 Vesting Day. A decision slips to Autumn 2026.
- 4.3 **Potential Impact:** There are two significant impacts under this scenario. The first relates to the compression of the implementation timetable: by holding Vesting Day to April 2028 but not firing the 'starting gun' until later than planned, the available implementation window shrinks further - and non-DPP areas are already at a disadvantage, with Ministers’ decision due almost three months later than for DPP areas despite sharing the same Vesting Day target. Whilst councils can proceed with some preparatory activity in advance (i.e. no-regrets work), the full range of implementation activity cannot begin until a formal decision is made.
- 4.4 The second relates to the Structural Changes Order (SCO). Once a decision is taken on which proposal to implement, MHCLG must prepare the necessary SCO for Parliamentary approval. In this scenario the SCO would need to be

drafted, laid, and approved in an exceptionally compressed timeframe (likely only weeks) in order to maintain the May 2027 shadow unitary elections date.

- 4.5 **Scenario 2: Government moves Vesting Day to 2029:** MHCLG announces a one-year slip in Vesting Day from April 2028 to April 2029. This may be caused by a number of reasons – but the most likely is MHCLG programme or legislative capacity to concurrently undertake LGR across 21 areas simultaneously.
- 4.6 **Potential Impact:** A slip to 2029 would likely represent a significant but manageable programme event, as an additional 12 months would give officers across all councils more time to prepare services for transfer and establish an operating model for the new unitary councils. Whilst there may be some direct costs incurred due to the need for implementation teams be funded for longer, the additional time would likely lead to better quality implementation decision-making. The other two key risks are: uncertainty around the shadow unitary authority elections currently planned for May 2027; and Vesting Day potentially falling only weeks or months before a general election.
- 4.7 If shadow unitary authority elections were to take place as scheduled in May 2027 with a Vesting Day of April 2029, then those shadow council members would be in place for two years. All precedent suggests that the government would seek to move those shadow unitary elections to the May in the year prior to Vesting Day, as shadow councils are generally expected to be in place for approximately a year before Vesting Day.
- 4.8 A 2029 Vesting Day has a particular complication in that the next UK General Election must be held no later than 15 August 2029. If the General Election were to be held in May 2029 (as is common) a Vesting Day of 1st April 2029 would therefore fall during a potential election period. Incoming unitary councils would be responsible for organising and administering election arrangements, yet much of the preparation would necessarily have been undertaken by predecessor authorities - creating an inherent risk in switching administering authorities at such a sensitive moment.
- 4.9 **Scenario 3: Government pushes Vesting Day beyond the next General Election:** Vesting Day is pushed to April 2030 or later, but beyond the mandatory latest date for the next UK General Election (15 August 2029) meaning LGR in Kent and Medway would be implemented, if at all, under a potentially different government.
- 4.10 **Potential Impact:** This scenario would represent a significant threat to the current programme. A new government has the power to halt, scale back, or fundamentally redesign the programme. A change of government would not automatically unwind SCOs already made (secondary legislation, once enacted, has legal force) but it could halt further SCOs and revoke decisions not yet legislated (even if they had been laid before Parliament). If Vesting Day slips beyond the election, there is a real risk that Kent and Medway's LGR is simply never completed. This would leave the area in a deeply difficult limbo: councillors and officers will have invested years in transition planning,

with significant sunk financial and opportunity costs; service and financial planning will have been built on the assumption of structural change, and workforce planning will be significantly disrupted.

- 4.11 **Scenario 4: Government abandons LGR policy:** The government formally withdraws or indefinitely suspends the LGR programme, either due to legal pressure, political reversal, a change of administration, or fiscal constraints. No Vesting Day is set, and no SCOs are made for non-DPP areas.
- 4.12 **Potential Impact:** While this scenario is the least likely in the short term given the scale of political and legislative investment already made, it cannot be dismissed. Abandonment would have differential impacts depending on the stage reached: where an SCO had already been made it would retain legal force, whereas decisions not yet legislated could be halted or revoked. The financial pressures driving LGR would not disappear; they would simply be unaddressed. It would require managing sunk transition costs, addressing political and officer exhaustion, and rebuilding a longer-term strategic case for the future of local government in Kent and Medway. There may be opportunities to formalise the voluntary joint working arrangements between KCC, Medway and district councils and explore whether a voluntary shared services framework built upon the learning from LGR preparation.

Recommendations

The Cabinet Committee is asked to:

- (1) **Note** and **comment** on this update
-

Relevant Director:

David Whittle, Director of Strategy, Policy, Relationships and Corporate Assurance – david.whittle@kent.gov.uk

Report Authors:

Jenny Dixon-Sherreard, Strategy Manager, Strategy, Policy, Relationships & Corporate Assurance – jenny.dixon-sherreard@kent.gov.uk

Edward Thomas, Strategy Manager, Strategy, Policy, Relationships & Corporate Assurance – edward.thomas@kent.gov.uk

Background documents:

Previous papers to the Devolution and LGR Cabinet Committee, available at <https://democracy.kent.gov.uk/ieListMeetings.aspx?CId=979&Year=0>

'Future Surrey', the official website for Surrey's Devolution and Local Government Reorganisation, available at <https://www.surreylgrhub.gov.uk/>

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From: Linden Kemkaran, Leader
Amanda Beer, Chief Executive

To: **Devolution and Local Government Reorganisation Cabinet Committee – 23 March 2026**

Subject: Update on Kent and Medway LGR implementation preparation

Classification: **Unrestricted**

Summary:

This paper provides an update on the collaborative work between all 14 Local Authorities in Kent and Medway on Local Government Reorganisation, in the interim period between Business Case submission in November 2025 and Ministerial decision in summer 2026, in preparation for the significant work that will be required thereafter.

Recommendations:

The Cabinet Committee is asked to:

- (1) **Note** the continued collaborative working between all 14 Councils in Kent and Medway, and the commitment to continue working closely together in anticipation of Ministerial decision expected by July 2026, and then beyond.
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1. Background

- 1.1 In February 2025 the then Minister for Local Government invited Councils in Kent and Medway to submit proposals for local government reorganisation (LGR). After submitting a joint interim proposal in March 2025, Leaders were given a deadline of 28 November 2025 to submit final business cases on reorganisation.
- 1.2 Unlike other areas of the country, all 14 Councils in Kent & Medway were able to work together throughout the process collaboratively and collectively, utilising a single Strategic Business Partner, options appraisal, evidence base, financial analysis, communications, and programme governance, ensuring the work was as efficient and as joined up as possible, as directed by HM Government.
- 1.3 Leaders in Kent and Medway ultimately submitted 5 business cases on 28 November 2025 as follows:

Business Case 1A

A proposal for a single unitary council covering Kent and Medway to include three area assemblies covering the north, east and west of the county.

Business Case 1A is supported by Kent County Council.

Business Case 3A

A 3 unitary option consisting of Dartford, Gravesham, Medway and Swale in the North Kent; Sevenoaks, Tonbridge & Malling, Maidstone Tunbridge Wells in West Kent, Ashford, Canterbury, Thanet, Dover, Folkestone & Hythe in East Kent.

Business Case 3A is supported by Folkestone & Hythe District Council, Maidstone Borough Council, Sevenoaks District Council, Tonbridge & Malling Borough Council and Tunbridge Wells Borough Council

Business Case 4B

A 4 unitary option consisting of Dartford, Gravesham and Medway in North Kent; Sevenoaks, Tonbridge & Malling, Maidstone and Tunbridge Wells in West Kent; Swale, Ashford and Folkestone & Hythe in Mid Kent and Canterbury, Thanet and Dover in East Kent.

Business Case 4B is supported by Dover District Council, Swale Borough Council and Thanet District Council

Business Case 4D

A 4 unitary option with boundary changes consisting of most of Medway, Gravesham, Dartford, Swale, and small parts of Tonbridge & Malling and Maidstone in North Kent. Canterbury, Thanet, Dover, eastern Swale and part of Folkestone & Hythe in East Kent, Tunbridge Wells, Tonbridge & Malling and Sevenoaks in West Kent, and Maidstone, Ashford, southern Swale, parts of Tonbridge & Malling and part of Folkestone & Hythe in Mid Kent.

Business Case 4D is supported by Medway Council, Ashford Borough Council and Canterbury City Council

Business Case 5A

A 5 unitary option with boundary changes consisting of Gravesham, Dartford and Swanley and parts of Medway in North Kent, Tonbridge & Malling, Maidstone, Tunbridge Wells and the remainder of Sevenoaks in West Kent, Ashford, Folkestone & Hythe and Dover in South Kent, Faversham, Canterbury and Thanet in East Kent, and the remainder of Medway and Swale in Mid Kent.

Business Case 5A is supported by Dartford Borough Council and Gravesham Borough Council.

- 1.4 A map of each of the business case geographies can be found in Appendix 1 and the full business cases can be viewed on the Kent Council Leaders [website](#).
- 1.5 A Ministerial decision is expected by 16 July 2026. Ministers will decide whether to implement any of the submitted proposals, and with or without modification, based on the criteria, consultation responses, and other relevant information, with final agreement made collectively across HM Government.

Until then, councils will continue the preparatory work outlined in this paper.

2. MHCLG Listening Meetings

- 2.1 In December 2025, civil servants notified Kent & Medway Local Authorities that they would be scheduling one hour 'listening meetings' on each business case submission in February and March 2026. These would bring together senior officers of the Councils supporting each business case with responsible Directors within MHCLG, and give the opportunity for Councils to set out the rationale for proposals, emphasise key points, ask any questions of MHCLG and allow civil servants to ask any clarification questions.

3. Consultation

- 3.1 On 5 February 2026, HM Government launched a statutory seven-week consultation on local government reorganisation in Kent and Medway.
- 3.2 Ahead of the launch, civil servants worked with councils to identify statutory consultees most affected by potential changes, including public sector partners, neighbouring authorities, and key stakeholders. The consultation is open to all interested parties including residents, town and parish councils, businesses, and the voluntary sector, with full details and response instructions available on the HM Government website.
- 3.3 Council communications teams have collaborated closely with Chief Executives and Leaders to ensure the consultation is widely publicised and accessible. A joint stakeholder letter, press release, and social media materials have been issued. While individual councils may support specific business cases, all communications adhere to the Recommended Code of Practice for Local Authority Publicity and direct prospective respondees to view all proposals on the Kent Council Leaders website.
- 3.4 MHCLG is clear that views from residents and businesses are welcome and will be considered. To support access, councils have made promotional material and paper copies available in all libraries and council offices, with library computers enabling review of the detailed proposals for those who do not have their own devices.
- 3.5 The consultation closes at 23:59 on 26 March 2026. Initial indications are that there is a high level of engagement and a good response rate relative to other areas of the country. MHCLG is expected to publish a summary of responses in due course.

4. Enhanced Discovery Phase

- 4.1 In December 2025, MHCLG shared a list of 'preparatory activities' for councils to progress in the interim period between the submission of business cases in November 2025 and the anticipated Ministerial decision in July 2026. These activities draw on lessons from areas such as Cumbria that have recently undergone reorganisation.

- 4.2 In January 2026, Chief Executives reviewed, tailored, and prioritised the

suggested activities for Kent and Medway, identifying which actions should be undertaken by councils individually and which should be delivered collectively. This will be undertaken through the 'Enhanced Discovery Phase', overseeing 11 'Priority Activity Groups' operating until Ministerial decision in July 2026. The terminology distinguishes this preparatory work from the formal workstreams and programme structures required post-decision (see Appendix 2).

- 4.3 It is important to note that these activities are predominantly back office in nature and involve data and information consolidation that can be done now to ensure that once Ministerial decision is handed down, work on implementation can commence. This work explicitly does not involve thinking about transition, future service delivery or redesign now, and it does not pre-empt Ministerial decision. The aim is to consolidate the information needed to support effective joint discussions on transition after the decision. All work in this phase is required regardless of which business case is selected.
- 4.4 Each Priority Activity Group is led by a Chief Executive, supported by a deputy, a project officer, sector representative(s), a KCC representative, a Medway Council representative, and any additional officers as required. During this initial phase, the programme will use existing staff wherever possible and costs will be met by the authorities providing these staff.
- 4.5 The Project Officer coordinates and drives delivery of each group's priority activities, working closely with the Lead and Deputy Chief Executive. This role is undertaken alongside existing responsibilities and is limited to the duration of the Enhanced Discovery Phase. To strengthen cross-council collaboration, Project Officers are drawn from different authorities to the Lead and Deputy Chief Executives.
- 4.6 A Project Officer Coordination Group, chaired by the Strategic Partnerships Team, brings all Project Officers together to maintain oversight, track progress, escalate risks, and report to the LGR Programme Board. Throughout this phase, Chief Executives will review resourcing arrangements and begin developing a sustainable model for the post-decision programme office and implementation workstreams.
- 4.7 Informed by the 'what if' scenario planning referenced in the previous item, Chief Executives will collectively assess the likelihood and impact of potential scenarios and agree joint responses to ensure Kent and Medway are as well-prepared as possible should these eventualities arise.

5. Governance and Member Oversight

- 5.1 Kent Council Leaders and Kent Local Authority Chief Executives receive regular updates from lead officers. The Chief Executives act as the LGR Programme Board, with individual Chief Executives taking a hands-on role in overseeing Priority Activity Groups to ensure strong coordination and alignment. However, neither Kent Council Leaders nor Local Authority Chief Executives are decision-making bodies and hold no formal delegation. All parties are therefore clear that formal decision-making, member and officer oversight, and the role of individual executives and administrations remain the

responsibility of each sovereign council under its own constitution and delegations. This was demonstrated during the business case submission process, where decisions were taken through each council's individual democratic processes.

6. Finance

- 6.1 As a result of LGR, significant transition costs will be required to establish new councils and close down existing ones. Unlike other areas, Kent and Medway's five business cases are underpinned by shared financial analysis estimating the short and long-term costs and benefits of reorganisation. Current estimates indicate transitional implementation costs of between £99.4m and £139.1m, depending on which model is selected by the Minister. The business cases indicated these costs would be incurred over a five-year transitional period including shadow year where legacy authorities still exist and first 4 years of the new organisation of authorities.
- 6.2 Regardless of the final decision, disaggregation and aggregation costs will not be incurred until 2028/29, following vesting day and the transition to the new unitary council(s). These costs will be funded by the new authority(s) along with the remaining phasing of transitional costs.
- 6.3 Pre-vesting day costs for establishing the new unitary council(s) are estimated at £11.9m, spread partly in 2026-27 and the remainder in 2027-28. These costs will need to be funded by existing legacy councils, including Kent County Council. These pre-implementation costs include establishing a transitional team as well as provisions for systems consolidation, communications, workforce development, transition processes and contingency. The shared pre-implementation costs do not include any workforce exit costs incurred in the shadow year as these would be the responsibility of individual existing legacy authorities.
- 6.4 Chief Executives have agreed an apportionment methodology designed by Kent Finance Officers Group for these costs, and a Memorandum of Understanding will be signed by all councils to ensure that pre-implementation costs are managed consistently across all 14 councils with an equitable distribution between them. The apportionment methodology apportions pre-implementation costs up to vesting day and looks to average the cost apportionment on the basis of population and taxbase as follows:
- Between Unitary and Two-Tier area 50% by 2024-25 Taxbase and 50% Population Estimate
 - In the two-tier area between County and Districts by 80%: 20%
 - Between Districts and Boroughs 50% by 2024-25 Taxbase and 50% by Population Estimate
- 6.5 To date, HM Government has announced two rounds of funding to support preparatory work in 21 areas undergoing reorganisation. In 2025, Kent and Medway received £514,410, which was placed in the Kent County Council Strategic Partnerships Team budget for mutually agreed activity, including the joint procurement the Strategic Business Partner for business case development up to November 2025. Due to the collaborative and collective way

in which Kent and Medway Councils have worked together in a single programme and governance framework to date, £319,550 of this funding remains unspent to contribute to the next phase of the work.

- 6.6 On 16 February 2026, MHCLG announced an additional £63m nationally for the next phase of reorganisation. Based on previous allocations, Kent and Medway are expected to receive £4–4.5m towards pre-vesting day costs. It is proposed that this funding will again be held within the KCC Strategic Partnerships Team budget for jointly agreed work. As with the procurement of the Strategic Business Partner for business case development, Kent and Medway councils have requested that Kent County Council act as lead procurement authority for securing a Strategic Business Partner to support implementation from Ministerial decision to vesting day. Scoping work is underway to establish the required capacity and expertise.
- 6.7 A requirement for a Programme Director position to be recruited to before Ministerial decision and be in place up to vesting day is also agreed. It is envisaged this role will lead the implementation phase of the LGR workstreams. Responsibilities will include strategic management and delivery of the LGR process, the establishment of the shared Programme Management Office, oversight of the Strategic Business Partner, programme risk and compliance, and stakeholder management. This post will be funded through the MHCLG monies received and report to the Kent and Medway Local Authority Chief Executives.
- 6.8 As a result of this Government funding and the trajectory of the work required, it is not anticipated that additional resource will be required from Kent and Medway Council budgets for financial year 2026/27. However, if no further funding from HM Government is forthcoming in the interim, remaining pre-vesting day costs will need to be built into council budgets for 2027/28, in line with the agreed apportionment set out in the Memorandum of Understanding.
- 6.9 KCC's 2026-27 budget was built on the basis that impacts from LGR are likely to be minimal in that year; this is consistent with the financial analysis in this report. KCC's section 25 assurance statement identified that there is no provision within the medium-term financial plan for any set-up or transitional costs incurred by legacy authorities prior to establishment of shadow authorities or vesting of new authorities. This was based on the expectation that any cost would be met within existing budgets and where this is not possible, costs would be met from additional borrowing (including borrowing from long-term reserves). Any borrowing would be short-term and would have to be repaid from the savings arising for new authorities within the pay-back period.

7. Next steps and collaborative timetable

- 7.1 In anticipation of a Ministerial decision in July 2026, collaborative work continues apace to co-ordinate and oversee the Priority Activity Groups' work on the MHCLG preparatory activities, readiness for Ministerial decision including procurement of a Strategic Business Partner, and agreement of the Memorandum of Understanding. Background work continues on promotion of

the statutory consultation, ongoing co-ordination with all 14 councils and regular liaison with civil servants.

- 7.2 A graphic of the timetable setting out the alignment of the local and national timetable can be found in Appendix 2.

8. Recommendations

- 8.1 The Cabinet Committee is asked to:

Note the continued collaborative working between all 14 Councils in Kent and Medway, and the commitment to continue working closely together in anticipation of Ministerial decision expected by July 2026 and then beyond.

9. Relevant Director:

David Whittle, Director of Strategy, Policy, Relationships and Corporate Assurance – david.whittle@kent.gov.uk

10. Report Authors:

Tim Woolmer, Head of Strategic Partnerships, Strategy, Policy, Relationships & Corporate Assurance – tim.woolmer@kent.gov.uk

Dave Shipton, Interim Sn151 and Head of Financial Strategy - dave.shipton@kent.gov.uk

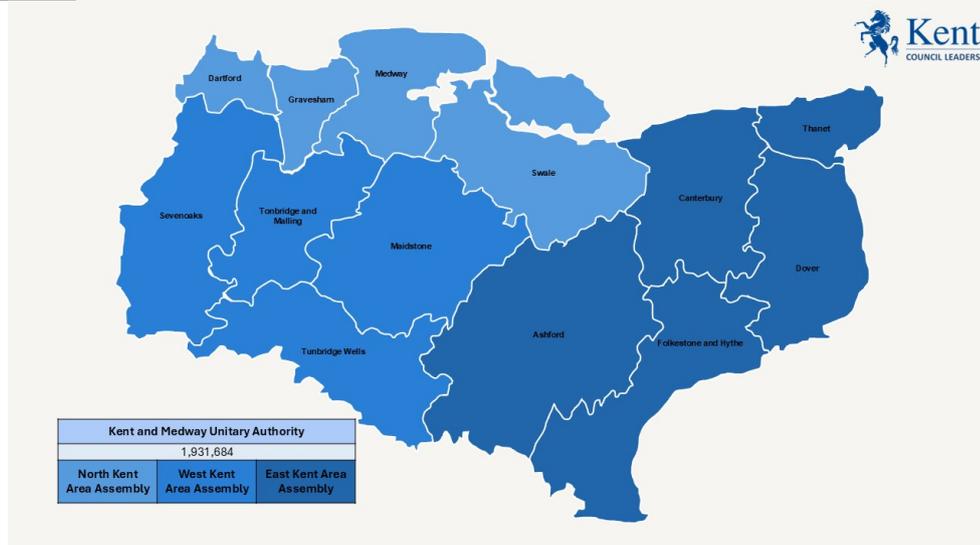
11. Appendices:

Appendix 1 – Geographies of business cases submitted

Appendix 2 – Illustrated local and national timetable to vesting day

Appendix 1 – Geographies of business cases submitted

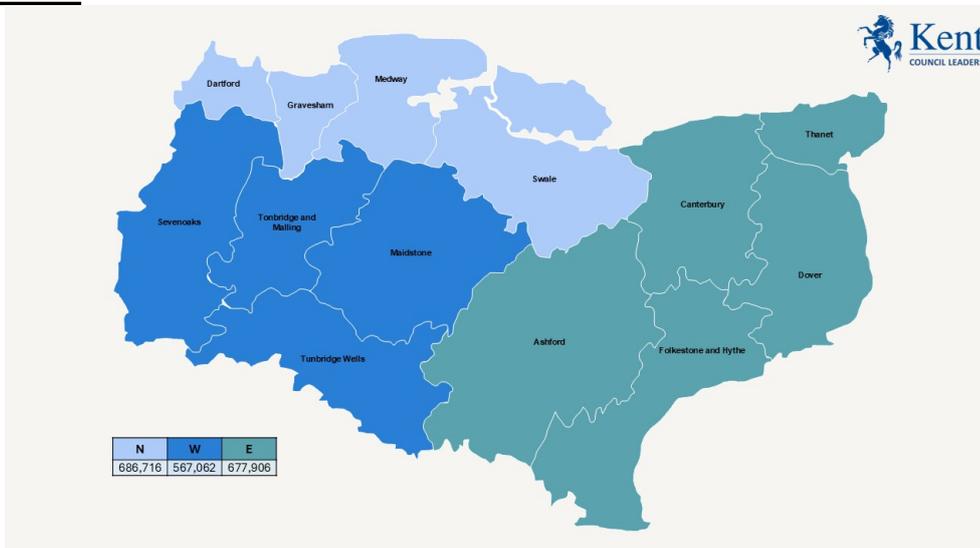
Option 1a



The proposal for a single unitary council covering Kent and Medway to include three area assemblies covering the north, east and west of the county has been supported by:

- Kent County Council

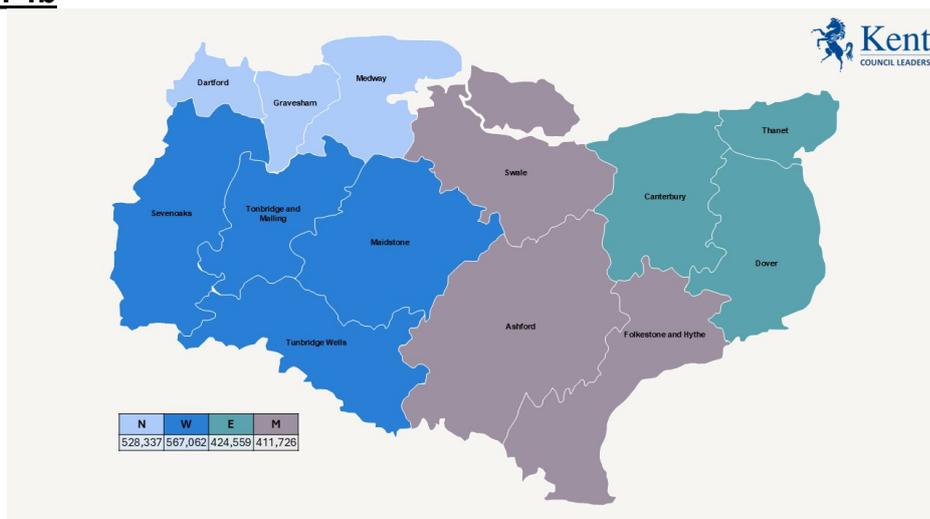
Option 3a



The three unitary option, consisting of Dartford, Gravesham, Medway and Swale in the north; Sevenoaks, Tonbridge and Malling, Maidstone and Tunbridge Wells in the west and Ashford, Canterbury, Thanet, Dover and Folkestone and Hythe in the east has been supported by:

- Folkestone & Hythe District Council
- Maidstone Borough Council
- Sevenoaks District Council
- Tonbridge & Malling Borough Council
- Tunbridge Wells Borough Council

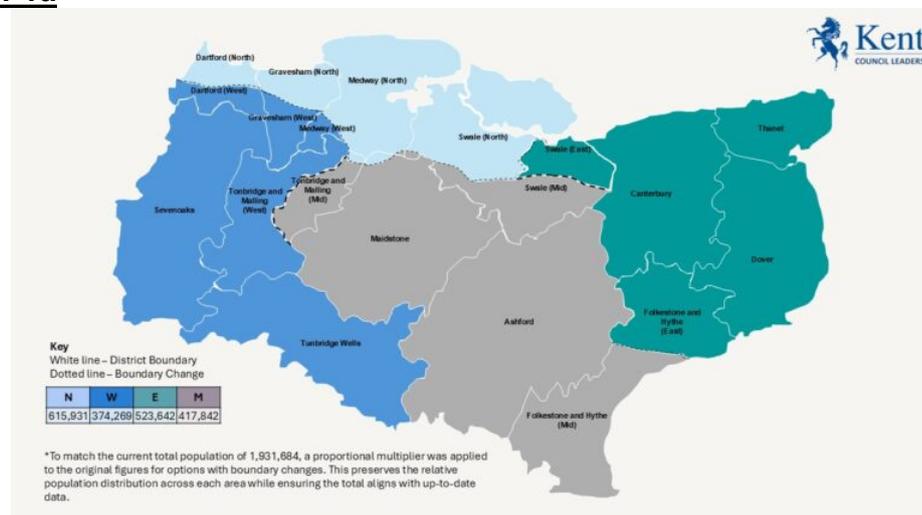
Option 4b



The four unitary council option which stuck to existing boundaries and consisted of Dartford, Gravesham and Medway in the north; Sevenoaks, Tonbridge and Malling, Maidstone and Tunbridge Wells in the west; Swale, Ashford and Folkestone and Hythe in the middle of Kent and Canterbury, Thanet and Dover in the east has been supported by:

- Dover District Council
- Swale Borough Council
- Thanet District Council

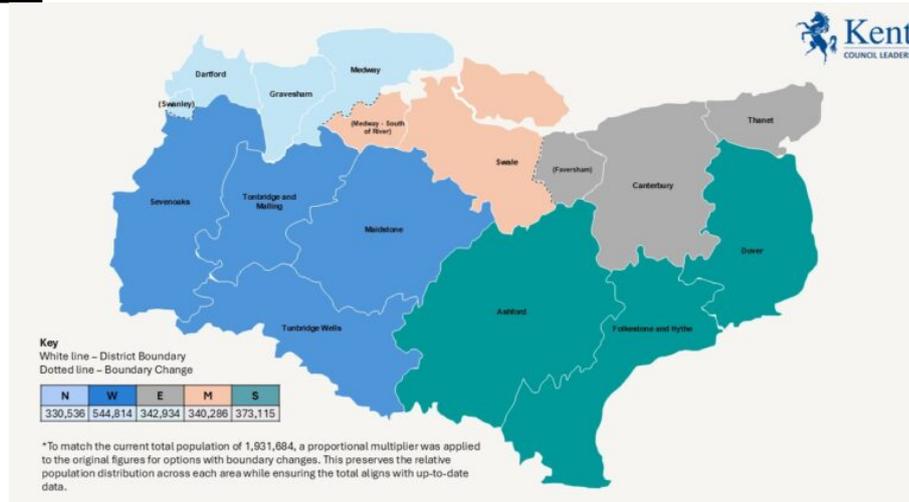
Option 4d



Option 4D would reorganise Kent and Medway into four new unitary councils. North Kent would bring together Medway, Gravesham, Dartford, most of Swale, and small parts of Tonbridge & Malling and Maidstone. East Kent would combine Canterbury, Thanet, Dover, eastern Swale and part of Folkestone & Hythe. West Kent would unite Tunbridge Wells, Tonbridge & Malling and Sevenoaks. Mid Kent would cover Maidstone, Ashford, southern Swale, parts of Tonbridge & Malling and part of Folkestone & Hythe. It is supported by:

- Medway Council
- Ashford Borough Council
- Canterbury City Council

Option 5a



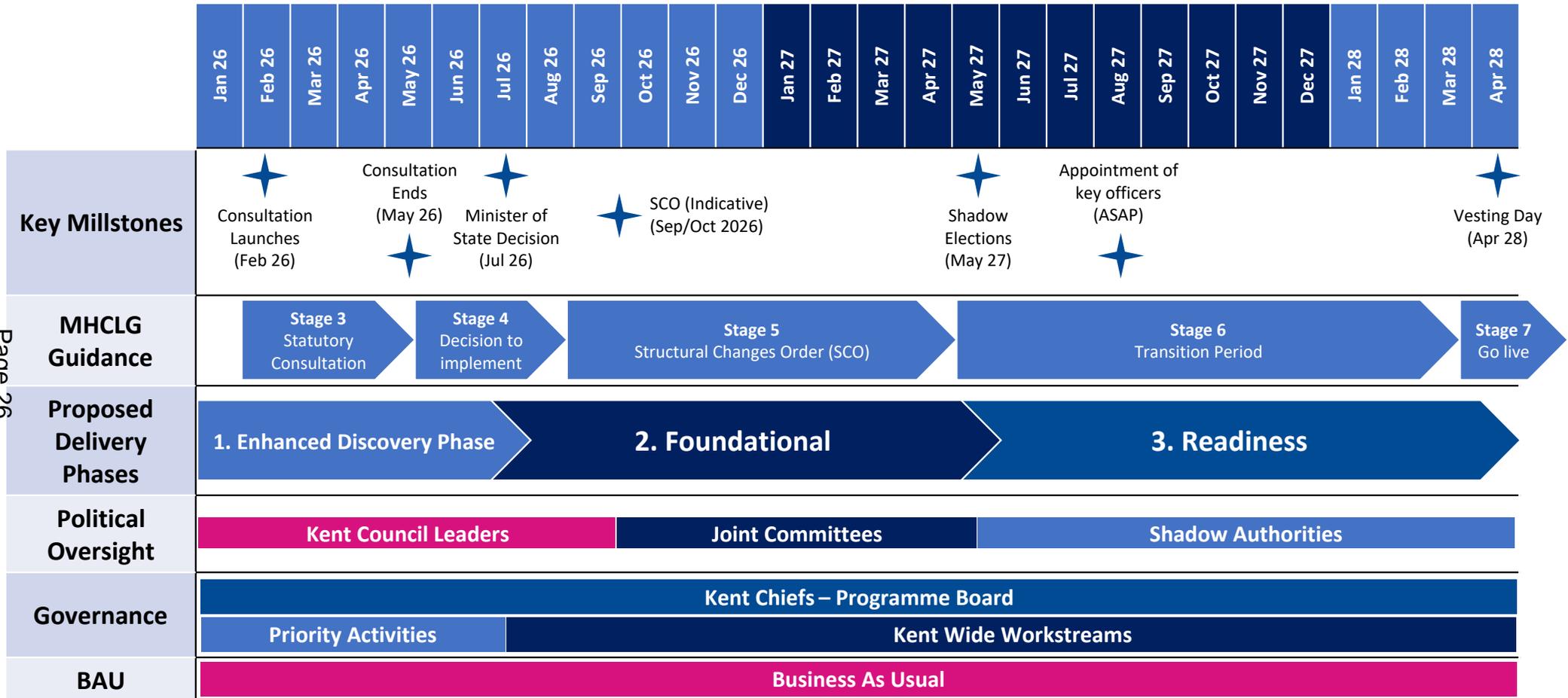
Option 5A proposes five unitary authorities for Kent. It would see a council for north west Kent that would take in the existing Gravesham and Dartford boroughs and Swanley which currently sits under Sevenoaks District Council. It would also extend eastwards, taking in areas currently under Medway Council up to the River Medway, and southwards to Snodland. Mid Kent would be formed of the rest of Medway and the rest of Swale. West Kent would combine Sevenoaks, excluding Swanley, Tonbridge & Malling, Maidstone and Tunbridge Wells. East Kent would be made up of the Faversham part of Swale, Canterbury and Thanet. South Kent would combine Ashford, Folkestone & Hythe and Dover.

It has been supported by:

- Dartford Borough Council
- Gravesham Borough Council

Appendix 2 – Illustrated local and national timetable to vesting day

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From: Linden Kemkaran, Leader
Amanda Beer, Chief Executive

To: **Devolution and Local Government Reorganisation Cabinet Committee, 23 March 2026**

Subject: **KCC Service Preparation for Local Government Reorganisation - Service Complexity Assessments**

Classification: **Unrestricted**

Summary:

This paper provides an overview of the Service Complexity Assessment (SCA) process that has been developed to support Kent County Council's internal preparation for Local Government Reorganisation (LGR). SCAs will provide KCC with a comprehensive understanding of each service or function and the information provided will be used to inform an assessment of its likely complexity in transitioning to new unitary council(s) through the process of LGR. The report outlines the SCA process and purpose, and the timetable aligned to Government's expected decision point in July 2026.

Recommendations

The Cabinet Committee is asked to:

1) Note and comment on the work underway to deliver Service Complexity Assessments.

1. Introduction

- 1.1. Local Government Reorganisation (LGR) represents a significant structural change for Kent and Medway. As set out in KCC's Strategic Business Case for LGR that has been submitted to Government, one of the greatest sources of risk in the LGR process will be potential disruption to the countywide services that Kent County Council (KCC) currently provides for the people of Kent, particularly if this involves the disaggregation of KCC services into multiple unitaries.
- 1.2. Therefore, in preparation for implementation - irrespective of the model that Government may choose - it is essential that KCC has a clear understanding of the potential complexities and areas of risk within its services and functions of implementing LGR.
- 1.3. This will ensure that KCC goes into the implementation phase with our partners with an evidence-based position on the issues that need to guide design of new council operating models and service delivery arrangements. It will also support effective planning and prioritisation of the implementation

work that needs to happen over the coming years to ensure safe and legal delivery of council services on vesting day for the new unitary/unitaries.

- 1.4. The SCA process has been developed to undertake the task of collating and assessing information about KCC's services and functions in a consistent and comprehensive manner.
- 1.5. The SCA process will run in parallel with and be complementary to the Enhanced Discovery Phase work led by the Kent Local Authority Chief Executives on the cross-cutting priority activities (outlined in a separate paper on this meeting's agenda). Both play an important role in informing the development of the future operating model(s) for the new unitary or unitaries.

2. Overview of the Service Complexity Assessment process

- 2.1. The SCA process will be led by the Strategy and Policy Team in collaboration with service leads across KCC's services and with input from relevant corporate services including HR and Finance. Whilst it will be delivered within existing resource constraints, given the scale of the activity, additional capacity may be sourced in order to meet the challenging timetable.
- 2.2. The SCA process aims to cover all of KCC's services and functions and works from a starting point that everything KCC currently provides will need to be transferred (at least initially) to the new council(s). A service list has been collated to identify the services and functions to be assessed. The list has been cross-referenced with HR structures and the Budget Book and checked with the relevant services for accuracy. Initially, the focus will be on assessing all services and functions in ASCH, CYPE and GET, and any services within CED/DCED that are delivered directly to people. These areas have been prioritised because they hold the greatest potential risk to service delivery to Kent residents. Corporate support functions will be assessed at a later stage, with the methodology adapted as necessary to complement and build on the Enhanced Discovery Phase which is coordinating preparation work in enabling functions.
- 2.3. During the SCA process, a consistent set of information about each service or function will be collated to inform an assessment of its likely complexity to transition to new unitary council(s) through the process of LGR. Each SCA will capture proportionate information in the following categories:
 - service demand profile
 - delivery model and operational dependencies with other services and partners
 - budget profile
 - staffing and workforce requirements
 - essential (specific) assets and systems
 - relevant legislative requirements.

- 2.4 The information collated will be used to assess the level of complexity. Assessments will include, for example, whether there are any significant geographical disparities in demand and spend, whether budgets, contracts and resources can be divided or duplicated and any specific legislative factors that will need to shape the design of future service delivery.
- 2.5 A request for information has been developed to collect the required information. Strategy and Policy officers will initially undertake desktop activity to collate corporately held information on service profiles, including information on budget and FTE. The form will then be shared with the relevant service leads, who will work with the Strategy and Policy team to populate the remaining sections and will be asked to provide their professional view on the risks and opportunities that LGR poses, recognising that they are the service experts.
- 2.6 A communications plan is being developed with CMT to ensure that staff are aware of the process and the requirement to engage with it. Service Leads will be supported by a dedicated Strategy and Policy Officer, who will help guide them through the process and work with them to collect the relevant information.
- 2.7 Once all of the SCAs have been completed, Strategy and Policy will develop summary scorecards based on the information collected. The scorecards will provide a comprehensive picture of each service / function, a judgement on level of complexity in each category and flag any significant complexities or risks.
- 2.8 The final stage of the SCA process will be to review the scorecards and provide an initial recommended pathway for each service or function. It is expected that in most cases, the assessment will find that the transfer of KCC services to new unitary/unitaries has no expected service-specific complexities, provided that proper implementation planning is undertaken and enabling corporate support functions are in place. In other cases, the assessment will flag high complexity and therefore recommendations will be made on how this could be managed. This could include identifying where specific implementation actions need to be taken to prepare the service for LGR, or where (by exception) shared service arrangements or temporary arrangements to maintain countywide delivery could be proposed if a decision is made to create multiple unitaries.
- 2.9 It is important to note that only the new unitary council(s), from when they are formed as shadow authorities following the elections, can make decisions about how the new unitary/unitaries and individual services will operate. Therefore, any recommendations made by KCC and partners through the preparation and implementation periods are for the purposes of supporting the shadow unitary/unitaries in their decision-making, especially considering that they will have less than one year to set up the new arrangements between elections and vesting day.

3. Timetable and next steps

- 3.1. The aim is to have all SCAs completed for front-facing services by July ready for the expected government decision point. The transition/implementation phase will need to begin quickly after the decision including discussions about future operating models and service design, so it is important that KCC uses this standstill period to undertake as much preparatory work as possible, so it is ready for this.

Milestone	Date
Development of methodology and pilot SCA process with nominated services	March 2026
SCA rollout across ASCH, CYPE, GET and relevant CED/DCED services	April/May 2026
Analysis and synthesis	June 2026
Completion of SCAs and initial recommendations	July 2026

- 3.2. Updates on progress and key findings will be shared with this Committee at its future meetings.

4. Conclusion

- 4.1. The SCA process is a critical preparatory step for KCC as the LGR process progresses. It will ensure that KCC has a robust, comprehensive and defensible understanding of its services, enabling informed decision-making, mitigating transition risk, and positioning the Council to respond effectively to whichever LGR model Government selects.

Recommendations

The Cabinet Committee is asked to:

- 1) **Note and comment on the work underway to deliver Service Complexity Assessments.**
-

Relevant Director:

David Whittle, Director of Strategy, Policy, Relationships and Corporate Assurance – david.whittle@kent.gov.uk

Report Authors:

Jenny Dixon-Sherreard, Strategy Manager, Strategy, Policy, Relationships & Corporate Assurance – jenny.dixon-sherreard@kent.gov.uk

Ryan Thomas, Policy and Strategy Officer, Strategy, Policy, Relationships & Corporate Assurance – ryan.thomas@kent.gov.uk

Background documents:

Papers to Cabinet, 19 November 2025, available at <https://democracy.kent.gov.uk:9071/ieListDocuments.aspx?CId=115&MId=9789>

Papers to County Council, 06 November 2025, available at <https://democracy.kent.gov.uk:9071/ieListDocuments.aspx?CId=113&MId=9799>

Papers to Devolution and LGR Cabinet Committee, 30 September 2025, available at <https://democracy.kent.gov.uk/ieListDocuments.aspx?CId=979&MId=9845>

Paper to Devolution and LGR Cabinet Committee, 28 July 2025, available at <https://democracy.kent.gov.uk/ieListDocuments.aspx?CId=979&MId=9870&Ver%20=4>

KCC webpage for Local Government Reorganisation and devolution, containing letters to and from KCC and government and further information regarding LGR and devolution, available at <https://www.kent.gov.uk/about-the-council/local-government-reorganisation-and-devolution>

English Devolution White Paper, Power and partnerships: Foundations for growth, Ministry of Housing, Communities and Local Government, 16 December 2024 available at <https://www.gov.uk/government/publications/english-devolution-white-paper-power-and-partnership-foundations-for-growth>

English Devolution and Community Empowerment Bill, July 2025, available at <https://publications.parliament.uk/pa/bills/cbill/59-01/0283/240283.pdf>

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From: Petra Der Man, Monitoring Officer

To: Devolution and Local Government Reorganisation Cabinet Committee, 23 March 2026

Subject: Local Government Reorganisation: Governance Overview

Status: Unrestricted

1. Introduction

- a) One common factor across all areas where there is currently a programme of Local Government Reorganisation (LGR) is the legal framework within which it takes place. This is set out in Part 1 of the Local Government and Public Involvement in Health Act 2007 ('the 2007 Act').
- b) In Kent and Medway, the current process was formally commenced within this framework by the Secretary of State inviting proposals for local reorganisation. This happened on 5 February 2025. Following submission of these proposals, at the time of this report the Government is consulting on the different options¹.
- c) The purpose of this report is to outline the legal and governance aspects of how LGR will progress following the closure of the consultation on 26 March 2026, and highlight some areas for further consideration.

2. LGR: Decision and Implementation

- a) Under the 2007 Act, it is for the Secretary of State to determine whether to take forward any of the proposals, and if so, which one (with or without modifications). The Secretary of State does have the option to seek advice from the Local Government Boundary Commission for England ('the Commission') which may impact the final shape of the proposals. The Commission have indicated that they are not planning to look at any proposals until after implementation.
- b) Whatever the decision of the Secretary of State, the affected local authorities do not have the power to pause or prevent any proposed changes.
- c) However, there will be discussions between central government and the affected local authorities on the practical detail of implementing reorganisation and this will be an opportunity to shape what this looks like and raise awareness of how the local context may need specific arrangements.
- d) The framework for taking a specific LGR proposal forward will be formally set out through the following²:

¹ [Proposals for local government reorganisation in Kent and Medway - GOV.UK](#)

² Depending on the proposal taken forward, if any, other pieces of legislation may be required. However, these three ways apply across the board.

- i. Structural Change Orders (SCO).
 - ii. Directions under section 24 of the 2007 Act.
 - iii. Technical and consequential matters.
- e) The 2007 Act does not set out a timetable for when the different stages of taking an LGR proposal need to be taken forward. This is a policy choice of central government.

3. Structural Change Orders

- a) Structural Change Orders codify into legislation the proposal being taken forward. In reorganisations elsewhere, there has been a single SCO covering the whole of the area impacted, regardless of the number of unitary authorities that are coming into existence.
- b) SCOs are Statutory Instruments (secondary legislation) and are usually approved through the affirmative procedure. This means a draft of the SCO is laid before parliament and requires approval before it becomes law. Parliament cannot amend the draft. It is either approved, or it is not³. It is important, therefore, that the draft laid before parliament is fit for purpose. The practice has been for government to engage with the relevant local authorities on the content of the SCO following the announcement of the decision regarding which proposal is being progressed. There is often only a short period of time between the SCO coming into force and action being required; the longer lead-in period is to allow authorities to prepare voluntarily.
- c) The core purpose of an SCO is to set out how reorganisation will be implemented. It sets out where the decision-making responsibility will lie to make the practical and operational decisions to get the new authorities up and running. An SCO can also go into prescriptive detail as to how these decisions are made and these prescriptions are legally binding on outgoing and incoming authorities.
- d) The 2007 Act does not set out a specific model for where the authority for decision-making will reside. The proposal being taken forward and the existing structures will influence which model is introduced through the SCO. Broadly speaking, there are two:
- i. Joint Committee and Shadow Authority Model.
 - ii. Continuing Council Model.

4. Joint Committee and Shadow Authority Model

- a) Under the joint committee and shadow authority model, once the SCO comes into force one or more joint committees must be established. There will be one joint committee for each incoming authority. Each existing authority within that footprint will be represented on the joint committee, in a manner set out in the SCO. This is the model which will be used in Surrey⁴.
- b) Joint committees usually need to be established within 14 days of the SCO coming into force. There is nothing to prevent joint committees being

³ Once approved, any revisions would usually require further legislation.

⁴ [The Surrey \(Structural Changes\) Order 2026](#)

established earlier as there are existing mechanisms for doing so. Surrey established voluntary joint committees⁵.

- c) The main role of the joint committee is to prepare for the establishment of the shadow authority, which will operate across the same footprint and replace the joint committee. There are restrictions on what activities a joint committee can do, but as a minimum they are usually required to:
 - i. Develop an Implementation Plan for the incoming authority on that footprint.
 - ii. Develop a code of conduct for adoption by the shadow authority.
- d) Joint committees are dissolved the day after the first meeting of the shadow authority with the executive (leader and cabinet) of the shadow authority taking the lead on decision-making on implementation.
- e) A shadow authority is a body established for the purposes of ensuring all the necessary actions are taken to establish the new authority on the same footprint and ensuring the continuity of the delivery of public services leading up to and beyond vesting day (the day when the new authority comes into legal existence and assumes its functions). In most cases where a shadow authority has been established, it has been a directly elected body.
- f) At its first meeting, the shadow authority must:
 - i. Establish a leader and cabinet model of governance.
 - ii. Determine core governance arrangements.
 - iii. Adopt a member code of conduct. A draft would have been prepared by the joint committee.
 - iv. Appoint the following interim officers – Monitoring Officer (MO), Chief Finance Officer (CFO), Head of Paid Service (HOPS). These are usually existing officers of the relevant district/county authorities.
- g) The shadow authority is required to do the following, either on an ongoing basis, or at the first or a later meeting:
 - i. Adopt a Members Allowances Scheme for the shadow authority and for the incoming unitary authority/authorities. The requirement for an independent remuneration panel report remains.
 - ii. Appoint a substantive HOPS, CFO, and MO by 31 December of the transition year. These appointments will commence from the day of appointment and continue into the incoming authority.
 - iii. Revise and review the implementation plan agreed by the relevant joint committee.

⁵ [DLGR Update to Cabinet January 2026.pdf](#)

- h) Aside from the responsibility of service delivery, shadow authorities are required to act as regular authorities and are subject to the same legal framework of audit, governance, financial management and so forth.
- i) The costs of the shadow authorities, and associated elections, are to be shared between the relevant authorities in a manner that they determine. If they cannot agree, the Secretary of State can determine the share or task an arbitrator to do so.
- j) The wards for election to the shadow authority are set out in the SCO. Members elected to the shadow authority automatically become Members of the new authority at vesting day and the practice is for there to be a full four-year term before the next election (i.e., members serve 5 years, all other things being equal – 1 year on the shadow authority and then 4 on the incoming authority). There are indications that the Commission will carry out an electoral boundary review of new unitary authorities between the first and second round of elections.
- k) Individuals can serve as elected members on a shadow authority and an outgoing authority at the same time. Conflicts of interest would need to be managed in accordance with the principles of good governance.

5. Continuing Council Model

- a) With the continuing council model, a new unitary authority is based on borough/city/district council functions transferring to the legal entity of the county council and the county council being reorganised to create the new unitary authority.
- b) An implementation executive is set up as a committee of the continuing council's executive, usually within 14 days of the SCO coming into force. Representatives of all authorities impacted by LGR are represented and it is responsible for preparing an implementation plan and other transitional activities.
- c) Following elections to the continuing council, to new electoral divisions, the executive of the continuing council takes on the transitional functions and the implementation executive is dissolved.
- d) This was the model used in North Yorkshire's LGR in 2022⁶ where 1 county council and 7 district councils were replaced by a single unitary covering the county. North Yorkshire Council (covering the whole county) was the continuing council with the 7 districts being dissolved in 2023.

6. Shared Elements

- a) In broad terms, whichever model is put in place, the shadow authority/continuing council and executive are empowered to undertake the following:
 - i. Preparation for assumption of full authority powers.

⁶ [The North Yorkshire \(Structural Changes\) Order 2022](#)

- ii. Prepare budgets (including setting Council Tax) and policies/plans required for new authorities.
 - iii. Run themselves as an authority.
 - iv. Liaise with councils and other shadow authorities to ensure continuity of services.
- b) Within each SCO there is usually prescriptive content to ensure that Implementation Teams are established, drawing on Officers from across all authorities. Legal duties are placed on all authorities to co-operate with each other and release staff for duties relating to the transition.

7. Section 24 Directions

- a) Section 24 of the 2007 Act enables the Secretary of State to set parameters on the decisions an outgoing authority can take without the consent of the relevant shadow authority.
- b) The Best Value Duty applies to all local authorities which means they must be able to demonstrate “continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.”⁷ Robust financial governance is essential through the transition period and section 24 directions are intended to help ensure that the decisions and financial strategy of outgoing authorities do not fetter future decision-making and the financial sustainability of new authorities.
- c) As with the contents of SCOs, there are likely to be discussions with central government on the detail of any directions to be issued. Unlike SCOs, section 24 directions come directly from the Secretary of State and so do not need parliamentary approval, with the Secretary of State having the final say. They automatically expire on vesting day.⁸
- d) On 25 July 2025, the government issued the explanatory note “Financial decisions before local government reorganisation.”⁹ This contained the following:
- a. “The government intends again to issue directions under section 24 of the 2007 Act, once Structural Changes Orders have been made, to specify a person to give consent for all relevant matters and how that power is to be exercised. We anticipate that these directions will follow the precedents previously set, namely that written consent from the successor council will be required for land disposals worth more than £100,000, entering contracts of more than £1,000,000 for capital and entering contracts of more than £100,000 for non-capital (whole life costs).”¹⁰

⁷ Section 3, Local Government Act 1999, [Local Government Act 1999](#).

⁸ For an example of a section 24 direction see [Cumbria, Somerset and North Yorkshire councils: direction - GOV.UK](#)

⁹ [Financial decisions before local government reorganisation - GOV.UK](#)

¹⁰ Ibid. Paragraph 7.

- e) This is in line with the levels of materiality set in the 2007 Act¹¹, and the contract thresholds are cumulative where multiple contracts are entered into with the same organisation. Together this means that an outgoing authority's ability to make business as usual decisions and maintain statutory services will be impacted by the restrictions put in place and the need to take decisions through the governance processes of two authorities. Urgency provisions would also need to be put in place for taking decisions where the full process could not be undertaken.
- f) Other areas have made use of a mechanism called general consent. This is where the transitional executive sets out its own parameters as to where outgoing authorities can continue to make decisions without the transitional authority needing to also give permission. Where there is a shadow authority established, the general consent would be given to the outgoing authorities. In the case of a continuing council model, the general consent would be given to the outgoing borough/city/district councils. The general consent could cover such things as specific areas of activity or category of contract, and/or amend some of the materiality or cumulative contract restrictions¹².
- g) Where a general consent has been given, there remains an expectation that outgoing authorities act so as to ensure that new authorities have maximum flexibility in contracts and agreements in order to meet their own Best Value Duty.
- h) There are potentially serious consequences for acting outside section 24 directions and general consents – any contracts entered into by an authority without the required consent will be legally unenforceable by, or against, the authority in question and its successor new unitary council, and any transfer or acquisition relating to land will be void.
- i) Due to the need for a shadow authority to positively agree any general consents, the timing of a section 24 direction and shadow authority executive meetings is important. Once issued, the direction applies until the general consent can be given, with all the applicable restrictions.

8. Technical and Consequential Matters

- a) The SCO covers the formal legal aspects of the dissolution of outgoing authorities and the establishment of new ones. There are many technical and consequential matters which may require further provisions to ensure these are managed.
- b) These can come in the form of a 'supplementary' Statutory Instrument covering specific points. For example, one issued in 2023 for Cumbria, North Yorkshire and Somerset covered pensions and Harbour Revision Orders, amongst other matters¹³.

¹¹ Under section 29 of the 2007 Act, the Secretary of State may amend these figures, by order (i.e., through secondary legislation).

¹² An example of a general consent from a shadow authority can be seen at item 7 here - [Agenda for Shadow Executive on Wednesday 15 June 2022, 10.30 am | Cumberland Council](#), and for a continuing council at item 4 here [Agenda for Executive on Monday, 23 May 2022, 11.02 am | North Yorkshire Council](#).

¹³ [The Local Government \(Structural Changes\) \(Supplementary Provision and Amendment\) Order 2023](#).

9. Civic and Ceremonial Matters

- a) Where relevant, the SCO can cover civic/ceremonial matters. For example, that for Cumbria amended the Lieutenancies Act 1997 to establish that the Lord-Lieutenant of Cumbria would cover the area of the two new unitary authorities.
- b) As part of the LGR process, other areas have set up charter trustees to maintain continuity of a town/city charter once a city/borough council has been abolished. The SCO for North Yorkshire set up two (Harrogate and Scarborough), with a supplementary SCO establishing two in Cumbria (Barrow and City of Carlisle).

10. Recommendation

The Devolution and Local Government Reorganisation Cabinet Committee is asked to NOTE the report.

11. Background Documents

None.

12. Report Authors and Relevant Director

Petra Der Man, Head of Law
petra.derman@kent.gov.uk

Tristan Godfrey, Senior Governance Manager
tristan.godfrey@kent.gov.uk

Katy Reynolds, Governance Advisor
katy.reynolds@kent.gov.uk

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From: Linden Kemkaran, Leader of the Council
Amanda Beer, Chief Executive Officer

To: Devolution and Local Government Reorganisation Cabinet Committee

Date: 23 March 2026

Subject: KCC Draft Corporate Risk – Local Government Reorganisation

Classification: **Unrestricted**

Past Pathway of Paper: None

Future Pathway of Paper: None

Electoral Division: All

Summary:

This paper presents the draft corporate risk that is proposed for inclusion in the Council's Corporate Risk Register.

Recommendation(s):

The Cabinet Committee is asked to **CONSIDER** and **COMMENT** on the risk presented.

1. Introduction

- 1.1 Risk management is a key element of the Council's Internal Control Framework and the requirement to maintain risk registers ensures that potential risks that may prevent the Authority from achieving its objectives are identified and controlled. The process of developing the registers is therefore important in underpinning service delivery planning, performance management and operating standards. Risks outlined in risk registers are taken into account in the development of the Internal Audit programme for the year.
- 1.2 This Committee provides a dedicated space for discussion regarding the Local Government Reorganisation (LGR) process in Kent and Medway, including implications from a KCC perspective. The reports and associated scrutiny has highlighted risks, issues and opportunities, for which key elements at a high level, feature in the articulation of the draft risk attached in appendix 1.

2. Background and national context

- 2.1 As LGR has been developing across the country, several bodies have been gathering information on risks, issues and learnings experienced by local authorities in two-tier areas transitioning to unitary structures. For example:
- 2.2. Grant Thornton published a report in autumn 2024, [Learning from the new unitary councils](#), which focused on the management of the LGR process in councils that had gone through LGR since 2019, and the associated risks. These risks predominantly related to:
- Transition governance and the timing of governance arrangements.
 - Financial sustainability, including escalating transformation costs, delayed realisation of financial benefits and risks arising from inherited financial positions.
 - Balance sheet disaggregation and aggregation.
 - Capacity and capability, including finance, leadership and programme management.
 - Internal audit and assurance requirements being underestimated.
 - Delivery risk, where focus on “day one” leaves a lack of focus on planning for the operating model and benefits realisation.
- 2.3. In November 2025, the Ministry of Housing, Communities and Local Government, the Local Government Association, and sector advisors from across local government have developed an aide-memoire to support the identification of risks and potential mitigations that could affect the successful transition to a reorganised unitary authority. This is intended to be a living document and will be regularly updated to remain relevant for local authorities. [LGR risks: Examples and options for mitigation by councils | Local Government Association](#)
- 2.3.1 Key areas of risk highlighted relate to:
- Assets and property
 - Communications and Engagement
 - Data quality
 - Financial
 - Governance and decision-making
 - Human resources
 - Information Technology
 - Legal and regulation
 - Policy implementation
 - Service continuity and oversight
- 2.4 The majority of risks highlighted above will vary depending on local context and will be taken into account as part of KCC and partners’ preparation and planning for the transition to unitary structure(s) in Kent.

- 2.5 An LGR corporate risk has been drafted to capture the key risks from a KCC perspective and will be regularly reviewed as the process moves forward (see appendix 1). This will inevitably have a number of interdependencies with other risks on the council's existing register.
- 2.6 Once this risk has been added to the corporate risk register, a specific KCC LGR risk register will be created, which can be reviewed by this committee going forward.

3. Recommendation

Recommendation:

The Devolution and Local Government Reorganisation Cabinet Committee is asked to **CONSIDER** and **COMMENT** on the draft corporate risk presented.

Background Notes:

A standard reporting format is used to facilitate the gathering of consistent risk information and a 5x5 matrix is used to rank the scale of risk in terms of likelihood of occurrence and impact. Firstly, the current level of risk is assessed, taking into account any controls already in place to mitigate the risk. If the current level of risk is deemed unacceptable, a 'target' risk level is set and further mitigating actions introduced, with the aim of reducing the risk to a tolerable and realistic level. If the current level of risk is acceptable, the target risk level will match the current rating.

The numeric score in itself is less significant than its importance in enabling categorisation of risks and prioritisation of any management action. Further information can be found in KCC's risk management policy and strategy.

Contact details:

Report Author:

Mark Scrivener, Head of Risk & Delivery Assurance

Mark.scrivener@kent.gov.uk

Relevant Director:

David Whittle, Director of Strategy, Policy, Relationships and Corporate Assurance

David.whittle@kent.gov.uk

APPENDIX 1 – DRAFT Corporate Risk

Risk ID CRR0069 Implementation of Local Government Reorganisation (LGR)					
Source / Cause of risk	Risk Event (s)	Consequences (s)	Risk Owner	Current Likelihood	Current Impact
On the 28 th November 2025, business cases for LGR were submitted to government by local authorities, as per statutory invite.	Insufficient capacity to deliver the transition within available resources and to time, alongside delivery of KCC’s Medium Term Financial Plan and ensuring service continuity.	Quality of KCC service delivery impacted ahead of vesting day of successor authorities.	Amanda Beer, Chief Executive Officer	Possible (3)	Major (5)
A KCC Strategic Business Case was developed through detailed internal analysis, independent financial modelling, and active participation in the joint Kent and Medway LGR process. This included a joint options appraisal (completed by KPMG on behalf of Kent Council Leaders) and through an internal options appraisal conducted by KCC.	Lack of clarity regarding the legal responsibility for leading implementation until a Ministerial decision is made.	Continuity of services impacted, before or during transition.		Target Residual Likelihood Unlikely (2)	Target Residual Impact Major (5)
Options taken forward by partners all involve disaggregation of countywide services such as social care and highways, with recognised safety, service quality and resilience and financial concerns, and vulnerabilities inherent in any mitigating structures proposed (such as social care partnerships). There are particular concerns around how EU border-related pressures in Kent can be managed when key services are disaggregated,	Lack of clarity or agreement regarding the funding model, apportionment and costs, required to support LGR implementation.	Further strain on KCC finances.			
	Disagreement regarding future service design of new local government structures e.g. shared services.				

including managing the arrival of UAS children and traffic management, which require countywide coordination and scale.

LGR preparation is happening while there are continued financial and operating challenges for KCC and the local government sector (see CRR0009), and Government has stated that funding to support LGR must be found at local level.

The timescales for implementation are ambitious for change of such scale and complexity and there is a significant dependency on the form of the Structural Changes Order that will dictate how much of the implementation happens. There is precedent from Surrey that KCC may be required to lead the joint implementation work with other Kent and Medway councils, adding to capacity pressures and delivery complexity.

Existing councils will not technically be decision makers for future service design and structures, this responsibility falls to the successor, unitary authority/ies.

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Control Title	Control Owner
Continued commitment from KCC to be open, pro-active and transparent while working with partner authorities as the LGR process evolves.	David Whittle
Prioritisation of work to ensure key information required for LGR is ready accessible when required and of good quality e.g. asset registers.	Corporate Management Team
Coordinated implementation planning within KCC and a consistent approach in the joint work.	David Whittle

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From: Linden Kemkaran, Leader of the Council
Amanda Beer, Chief Executive Officer

To: **Devolution and Local Government Reorganisation Cabinet Committee, 23 March 2026**

Subject: For information item: KCC's response to the Government's consultation on Local Government Reorganisation in Kent and Medway

Classification: **Unrestricted**

Summary:

The Government has opened a statutory consultation (5 Feb–26 Mar 2026) on five proposals for Local Government Reorganisation (LGR) in Kent and Medway, including KCC's own proposal (1a).

KCC will submit a single response in support of option 1a and outline KCC's main concerns with the alternative multiple-unitary options. Additional comments are provided on proposals involving boundary changes (4d and 5a). The response is included as an appendix to this report.

Government intends to use consultation findings to inform their decision on which model, if any, to implement, with a final decision on LGR in Kent and Medway expected in the summer.

Recommendations:

The Cabinet Committee is asked to:

- (1) **Note** the response to the Government consultation to be submitted by Kent County Council which is shared with the Committee for information.

1. Introduction

- 1.1. The Government launched its statutory consultation¹ on the options for Local Government Reorganisation in Kent and Medway on 5th February 2026. All five of the proposals submitted to Government from Kent and Medway councils – 1a (submitted by KCC), 3a, 4b, 4d and 5a – are being consulted on.

¹ [Local government reorganisation in Kent and Medway - GOV.UK](https://www.gov.uk)

- 1.2. The consultation is being led by the Government and is open to the public. The Government have also invited named consultees to respond to the consultation, including other impacted local authorities in Kent and in neighbouring areas; as well as a broad range of partner organisations including representatives from health, safeguarding, policing, education, infrastructure, business and the Voluntary, Community, and Social Enterprise (VCSE) sector.
- 1.3. This report informs the Cabinet Committee of KCC's response to the consultation.

2. Consultation response

- 2.1. The consultation questions mirror the criteria for LGR proposals set by the Government which guided the development KCC's Strategic Business Case for LGR.
- 2.2. KCC will submit a single consultation response in support of option 1a, aligned with KCC's policy position and drawing on the arguments set out in the Strategic Business Case in favour of a countywide footprint for local government in Kent and Medway.
- 2.3. The response also sets out KCC's primary concerns with the other options, also drawing on the policy position and arguments set out in the Strategic Business Case. KCC's key concerns including the disaggregation of countywide services, financial sustainability across all areas of the county and concentrated pressures on the East of the county are relevant to all the alternative options.
- 2.4. There is a specific question about boundary changes where those have been proposed. In Kent and Medway this is relevant to options 4d and 5a and KCC's response refers to those proposals specifically in order to answer that question.
- 2.5. The consultation response is included as an appendix to this paper.

3. Next steps

- 3.1. The consultation closes at 11.59pm on 26th March 2026. KCC will submit its response to MHCLG prior to this deadline.
- 3.2. Government intends to use consultation findings to inform their decision on which model, if any, to implement (or modify and implement), with a final decision on LGR in Kent and Medway expected in the summer.

Recommendations

The Cabinet Committee is asked to:

- (1) **Note** the response to the Government consultation to be submitted by Kent County Council which is shared with the Committee for information.

Relevant Director:

David Whittle, Director of Strategy, Policy, Relationships and Corporate Assurance – david.whittle@kent.gov.uk

Report Author:

Jenny Dixon-Sherreard, Strategy Manager, Strategy, Policy, Relationships & Corporate Assurance – jenny.dixon-sherreard@kent.gov.uk

David Power, Corporate Strategy Officer, Strategy, Policy, Relationships & Corporate Assurance – david.power@kent.gov.uk

Appendices:

Appendix 1: KCC's proposed response to the Government's consultation on Local Government Reorganisation in Kent and Medway.

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KCC's response to Government's consultation on LGR in Kent and Medway

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

Subcriteria: (subcriteria only added to assist with drafting, will remove before submitting)

Proposals should be for sensible economic areas, with an appropriate tax base which does not create an undue advantage or disadvantage for one part of the area.

Proposals should be for a sensible geography which will help to increase housing supply and meet local needs.

Kent County Council **strongly agrees** that its proposal (1a) for a single unitary authority covering Kent and Medway represents the most sensible geography and economic area for LGR in Kent and Medway. The main reasons for this are set out below.

A solution that works for the whole county

The Strategic Business Case for option 1a sets out the geographic and spatial reality of the county that has brought KCC to the conclusion that a single unitary is the most viable option for Kent and Medway. The combined impact of Kent's unique border location, deep disparities in deprivation across the county, and pressures that come through being a peninsula create a county with vastly uneven levels of demand, spend and access to resources. This is felt most strongly in East Kent, which experiences the majority of the county's highest and most costly needs for council services while also bearing the brunt of pressures from the county's border location, with limited workforce and market options.

Kent has only been able to manage its unique pressures up until now through operating at county scale. A single Kent Council would allow the continuation of the countywide model that provides capacity and flexibility to balance demand across our large geography. It would provide financial resilience through the widest and fairest possible tax base and economies of scale. It would support the provision of high-quality service provision despite the unique challenges, as resources can be targeted to meet needs in different geographical areas and there would be capacity to invest in specialist roles, centralised support functions and innovation. This structure not only benefits local communities, but also supports national interests – due to its scale, Kent is a reliable partner to Government in managing issues of national importance such as the arrival of Unaccompanied Asylum-Seeking Children and border traffic management which require countywide coordination.

Maintains Kent and Medway as a functional economic area

A single Kent council would preserve Kent and Medway as the single, coherent economic area already recognised by Government. It would provide clear strategic oversight and one strong voice to engage with Government, attract investment, and deliver growth ambitions.

Existing strategies such as the Kent and Medway Economic Framework and Local Growth Plan operate at county scale because that is where economic impact is maximised.

Programmes like the Growth Hub and sector development require critical mass to function effectively. The Kent Council would strengthen this position, reinforce successful partnerships such as the Kent and Medway Economic Partnership and ensure growth projects reflect the needs of the whole county, not just the most affluent areas. The existing Business Advisory Boards would continue to operate at scale, whilst the sub regional partnerships that already exist in East, West and North Kent would be enhanced by the creation of three Area Assemblies to shape local priorities - supporting high streets, tourism, and specialist sectors.

Maximises spatial planning and development at scale

Kent and Medway's rapid growth demands an integrated approach to planning and infrastructure. A single Kent Council would provide the strategic leadership and capacity to deliver this - offering one point of decision-making, a consistent approach with developers, and the expertise to meet complex needs. It would enable Government to achieve housing targets by spreading growth across the whole county, overcoming the restrictions of spatial constraints and artificial boundaries between authorities.

The Kent Council would prepare a single statutory strategic plan, aligning housing, transport, and economic growth. This unified approach would ensure sustainable communities, informed by robust evidence and countywide tools such as the Kent and Medway Infrastructure Mapping Platform. It would simplify planning processes by consolidating authority, reducing negotiation complexity, and ensuring transparency and efficiency for developers and communities alike. It would also allow for a county-wide infrastructure strategy that equitably distributes developer contributions across both high-growth and underinvested areas.

Our concerns with multi-unitary proposals

Splitting the county through the process of LGR risks embedding disparities between more and less deprived areas in Kent and Medway. The pressures on some individual unitaries would risk their viability from day one. Internal KCC analysis shows that, at the average rate of harmonisation, there would be disparities in tax yield per head of population, with West Kent able to raise significantly more council tax due to higher property values. Modelling of multiple unitary options suggests that there will be significant disparities between unitaries in the cost of providing social care and SEND services, to the particular detriment of East Kent.

An East Kent unitary would also inherit statutory duties for accommodating Unaccompanied Asylum-Seeking Children and managing border-related traffic and other issues. Based on our extensive experience, KCC does not believe it is feasible for a unitary council of the scale proposed in the multi-unitary options to manage this alone. It would likely lack the financial resilience and specialist expertise to cope with demand and cost pressures, especially given delays and underfunding in current arrangements for UAS children. What is needed going forward is a permanent workable solution to the issues that the border brings. Disaggregation risks not only disrupting the carefully managed solutions that mitigate the worst of the impacts now, but also setting Kent and Medway back in working with Government on a proper long-term solution that reduces the detriments to our area's economy and quality of life, and the wider risks to the country.

As set out above, breaking the functional economic area would dilute partnerships and programmes that depend on countywide scale. LGR provides a valuable opportunity to align spatial planning so that growth comes with the infrastructure that is so badly needed to improve quality of life and economic growth in all parts of the county. While a single unitary maximises this opportunity, multiple unitaries would underutilise it, creating new boundaries between planning authorities with different policies and approaches, undermining the ability to take a strategic view that would be most advantageous for the whole county.

It is important to note that, as Kent and Medway was not included on the Devolution Priority Programme, there is currently no timeline in place for when a strategic authority might be created in the area. This means that the area must plan on the basis that LGR will happen with no concurrent development of a strategic cross-county vehicle that could have maintained the oversight and coordination that Kent and Medway needs to manage its unique pressures and drive growth and prosperity. Multi-unitary proposals will create new councils that will by default operate separately, with no in-built mechanism to maintain strategic working across the county for the foreseeable future.

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

Subcriteria:

Proposals should be supported by robust evidence and analysis and include an explanation of the outcomes it is expected to achieve, including evidence of estimated costs/benefits and local engagement.

Proposals should describe clearly the single tier local government structures it is putting forward for the whole of the area, and explain how, if implemented, these are expected to achieve the outcomes described.

Kent County Council **strongly agrees** that the Kent Council proposed in option 1a will be able to deliver the outcomes described in the proposal. The main reasons for this are set out below.

Provides the financial strength to deliver outcomes

As explained in our response to the next question, option 1a is clearly the most financially sustainable proposal for Kent and Medway. Put simply, it will cost less and deliver greater savings more quickly. This will ensure that the Kent Council starts and remains on a strong financial footing, which is core to the ability of any council to deliver outcomes for its residents. Importantly, unrestricted from the burdensome ongoing costs of disaggregating major services and with the lowest possible transition costs, the Kent unitary would be able to quickly reinvest maximum savings into services. The section of our Strategic Business Case 'Better outcomes for people and place', also referenced in our answer to question 5 below, sets out the priorities that a single council for Kent and Medway could get started on reforming straight away, working with partners and communities.

Kent and Medway is one of few areas that has used a shared financial assessment for all LGR proposals in the area, with standardised and jointly agreed methodologies and data. This means that there can be a high level of confidence that 1a is the most financially beneficial option of the five proposals, and that the assessment provides a realistic prediction of the amount of savings that can be realised by the Kent Council, and how quickly. The joint financial assessment has been enhanced with analysis by KCC's Finance division and external partners that further confirms the financial benefits of 1a and the financial risks to individual authorities in multi-unitary proposals.

Countywide scale, local delivery

The 1a option is a bold and different proposal for Local Government. This is because KCC believes that Kent is a unique place and requires a unique solution. Our vision for the Kent Council has been carefully developed and is grounded in the legislative requirements for local government functions, while introducing modern and innovative ways of working where this will improve efficiency and effectiveness.

Option 1a brings together the benefits of countywide scale and local delivery. The Kent Council would be responsible for critical people-based services like social care and SEND, and strategic services like planning and transport, to maximise economies of scale and minimise disruption to critical services and functions. While operating at a countywide scale would ensure strategic oversight, resilience, and efficiency for these key service areas, local responsiveness would remain central to service delivery. KCC does local every day - our services are in our residents' neighbourhoods and homes, and we use that insight to design services around local needs and circumstances. Building on KCC's proven model, the Kent Council would tailor services through area-based teams and embedded staff, enabling flexible, place-based delivery supported by countywide infrastructure.

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. Assemblies will be empowered to make decisions on how community services such as libraries, Family Hubs and highways maintenance are run, enabling a more tailored and responsive approach that reflects the distinct identities, needs, and priorities of local areas.

This combination of strategic oversight and critical scale along with local influence and responsiveness ensures that the Kent Council will be in the best possible position to deliver the outcomes that the Strategic Business Case sets out.

Builds on what works

The Kent Council builds on proven strengths. Key statutory bodies - Police, Fire and Rescue, NHS - already operate coterminously across Kent and Medway, and many strategic partnerships mirror this footprint because it works. This alignment enables integrated service delivery, efficient use of resources, and a strong collective voice nationally. Partnerships such as the Kent and Medway Resilience Forum, Kent Housing Group, and Kent and Medway Economic Partnership have delivered tangible results, from managing border disruption to driving housing improvements and securing investment into the county.

Stakeholders told us they value countywide collaboration and want it preserved through the LGR process. A single unitary simplifies accountability, strengthens these partnerships, and accelerates delivery of outcomes without wasting time creating new structures and relationships.

Our concerns with multi-unitary proposals

We have set out our concerns about the viability of some unitary councils that would be created in multi-unitary proposals, particularly in the East, due to the concentration of demand, spend and border pressures falling to smaller unitaries without the scale and capacity of a countywide response behind it. We believe that new unitaries in this situation would struggle to deliver positive outcomes for residents beyond (or even within) the statutory requirements and would have little capacity to invest in improvements and innovation.

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

Subcriteria:

As a guiding principle, new councils should aim for a population of 500,000 or more.

Efficiencies should be identified to help improve councils' finances and make sure that council taxpayers are getting the best possible value for their money.

Proposals should set out how an area will seek to manage transition costs, including planning for future service transformation opportunities from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects.

Manage debt locally.

Kent County Council **strongly agrees** that the Kent Council is the right size to be efficient, improve capacity and withstand financial shocks. The main reasons for this are set out below.

Financial sustainability is key

KCC is responsible for 73% of local government spending in Kent and Medway. Our scale and experience provide a countywide perspective - particularly in recognising that financial sustainability must be a core principle of any future governance model. Councils in Kent and Medway are facing mounting financial pressures, especially in high-cost areas such as Adult Social Care, Special Educational Needs and Disabilities (SEND), Children's Services, and housing. Long over-due funding adjustments through Fair Funding Review 2.0 need to be invested into services, not swallowed up in higher running costs due to disaggregation. For this reason, the financial resilience of local government in Kent and Medway and the value for money provided for our residents is fundamental to our position on LGR.

1a delivers the greatest savings, fastest payback period and lowest costs

The Kent Council would:

- Avoid the costs and risks of disaggregating key countywide services which could add up to £68 million per year in other options.
- Deliver 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.
- Incur the lowest transition costs - £99 million compared to up to £139 million for other options.
- Deliver the fastest payback period - 3.3 years compared to up to 14 years (or potentially never) in other options.

The following summary of the financial assessment of all five proposals for Kent and Medway, which has been jointly developed, shows the scale of the benefits of the 1a option compared to the others:

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.*

1a provides the fairest and most sustainable solution for the whole county

The Kent Council would:

- Avoid 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.
- Allow 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.
- Avoid unitaries inheriting uneven distributions of legacy debt, which currently varies hugely from £0 to £2,134 per head in different parts of the county.

Our concerns with multi-unitary options

It is KCC's position that LGR models that incur long payback periods place an unacceptable cost burden onto Kent and Medway's Council Taxpayers. While the payback period for 3a is moderate, the other options have estimated payback periods stretching to 14 years, or potentially never.

Multi-unitary options also deliver less financial benefit in return for the upheaval of LGR - the differences in cumulative benefit between a single unitary and the multi-unitary options can be shown for illustration on Band D council tax over a ten-year period as below:

- 3a – between £340 and £478
- 4b – between £560 and £791
- 4d – between £567 and £799
- 5a – between £787 and £1,111

Multi-unitary options incur unnecessary additional costs, particularly in critical services for vulnerable people that are already in financial crisis. This is highlighted in the findings of Newton/CCN modelling on disaggregation of people-based services, which used current data to estimate the impacts of separating adult social care, children's social care and SEND into different unitaries. This is an additional £14.9m in year 1 for three unitaries (3a) and £20.8m for four unitaries (4b). Conversely, a single unitary would save £16.2m in year 1. Analysis of disaggregation impacts in Kent and Medway is in line with the report by the County Councils Network (CCN) and Newton in October 2025 on people-based services. It warns that breaking up county councils into smaller unitary authorities could severely damage the sustainability of people-based services, particularly social care.

As previously referenced, the Strategic Business Case in option 1a is the only proposal in Kent and Medway that has looked at the legacy costs of key countywide services that would be inherited by individual unitaries in the multi-unitary options. It shows concentrations of demand and spend, driven by factors such as disparities in deprivation and where residential care providers are placed, that could put unsustainable cost pressures on individual unitaries. Funding and revenue-raising potential does not match the demand within these localised areas. Compounding this, our additional analysis also demonstrates the inequity in debt, reserves and assets between proposed unitary areas. Attempting to apportion these in a way that will not result in some unitaries being financially insecure from the outset will be a time-consuming, complicated and contentious process given the big differences between areas.

4. To what extent do you agree or disagree that the proposal will put local government in the area as a whole on a firmer footing, particularly given that some councils in the area are in Best Value intervention and in receipt of exceptional financial support?

Kent County Council strongly agrees that implementing Option 1a will put local government in Kent and Medway on a firmer footing. The main reasons for this are set out below.

This question relates to the in-principle Exceptional Financial Support that Medway Council received to address a shortfall in their 2026/27 budget. This is a capitalisation direction, allowing Medway Council to reclassify approximately £10 million revenue costs as capital expenditure, which can then be funded through borrowing or by selling assets. Prior to this Medway received Exceptional Financial Support of £28.5m in 2025/26 and £23m in 2024/25. This is a total of £60m in Exceptional Financial Support over three financial years. This longstanding reliance on Government support has exacerbated the already high levels of debt in Medway.

As well as being the most financially sustainable option and returning the greatest savings, a single unitary for Kent and Medway has the necessary scale to manage the county's legacy debt because it can raise revenue from across the entire area. This is most effective way to ensure that the whole area is put onto the strongest possible financial footing. Conversely, creating multiple unitaries means splitting legacy debt. Given the significant differences in debt levels between different parts of Kent, this would create very unequal distributions. Unitaries with the highest levels of debt would need to allocate sufficient space in their revenue budget to service the debt, which may be unsustainable. KCC's internal modelling shows that, for example, in option 4b, North Kent's inherited debt would be £1,254 per head, whereas West Kent's would be £586.

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

Subcriteria:

Proposals should show how new structures will improve local government and service delivery, and should avoid unnecessary fragmentation of services.

Opportunities to deliver public service reform should be identified, including where they will lead to better value for money.

Consideration should be given to the impacts for crucial services such as social care, children's services, SEND and homelessness, and for wider public services including for public safety.

Kent County Council **strongly agrees** that the Kent Council will deliver high quality, sustainable public services. The main reasons for this are set out below.

The scale and capacity to genuinely reform public service delivery

The Kent Council will use its scale and capacity to maximise the opportunities from LGR and reinvest efficiency savings into high quality public services and Public Service Reform. As set out in the Strategic Business Case for 1a, KCC has assessed the scale of challenge and opportunity presented by LGR to identify areas where the Kent Council would have the greatest impact. These fall across four main themes:

1. *Ensuring the sustainability and responsiveness of our services by shaping and strengthening the markets that our services rely on*

The Kent Council would provide the scale and stability needed to shape resilient local markets for the services our residents depend on. Currently, fragmented commissioning across multiple councils weakens buying power, drives duplication, and creates inconsistencies in provision. A single unitary brings all commissioning activity together, giving the council greater influence over care, housing, transport and infrastructure markets. Countywide scale strengthens the council's negotiating position, supports long-term contracts, and improves the ability to attract and retain skilled providers - particularly important in a peninsular county where market options are already constrained. This creates a more responsive system able to manage demand, withstand cost pressures and maintain high-quality services across all communities.

2. *Focusing on prevention rather than reactive services to improve outcomes for our residents*

The Kent Council would have the capacity, shared data and simplified governance needed to shift decisively from crisis response to prevention. Integrating functions such as public health, social care, education, housing, leisure and community safety brings opportunities for holistic service design and coordinated support that reaches people earlier. Option 1a combines this with the financial headroom required for genuine preventive investment. The Kent Council would ensure a consistent service offer across Kent and Medway, and one local government body simplifies partnership working with the NHS, Police and the voluntary sector, accelerating the action we can take together to tackle the root causes of systemic problems. Practical opportunities for integration and prevention often exist at operational level, integrating services in localities and neighbourhoods. By aligning the Area Assemblies with our key partners' operational teams, Area Assemblies will be empowered to work with partners to design and deliver local transformation projects, backed up by countywide capacity and commitment. This will be particularly important in supporting health reform which cannot be successful without council services and teams working seamlessly with the NHS on neighbourhood health, hospital discharge and joint commissioning.

3. *Spatial planning and infrastructure delivered at the right scale to ensure communities grow in a sustainable way*

The Strategic Business Case for option 1a and our answer to question 1 above make the case that Kent and Medway's rapid growth and complex infrastructure needs requires strategic planning at scale. A single unitary brings spatial planning, transport, housing, social care and economic development into one system, allowing decisions to be made in the round. For example, integration with social care would maximise opportunities for co-located services and the expansion of supported accommodation in the right places with the right surrounding infrastructure, helping more people to live independently. In addition, shared data and digital platforms would improve efficiency and support community engagement through Town and Parish Councils.

4. *Delivering value for money and unlocking greater financial capacity for community-based services which improve quality of life*

The increasing demands of people-based services on local government budgets mean less resources are available to invest in universal services such as waste, highways maintenance, leisure and community services - the services that make our places communities. The Kent Council would bring together those place-based services which are currently split across different tiers of government, increasing accountability and freeing up resources to be able to invest in services and spaces that make a difference to people's lives every day. Through the three Area Assemblies and with a greater focus on community engagement, the Kent Council will be able to understand and put in place what is most important to local people, increasing the perception of value for money from the council and pride in place.

Avoids fragmenting crucial services

Disaggregating countywide services into multiple unitaries would have profound and immediate impacts on service quality, resilience and workforce capacity. Fragmentation removes the shared infrastructure that underpins effective delivery in crucial services including social care, SEND and strategic transport, replacing coherent, countywide arrangements with smaller systems that lack the capacity and specialist depth required. The Kent Council would retain and build on the proven countywide-working model, allowing services the flexibility to prioritise capacity where it is needed to ensure high service quality for all parts of the county.

A single unitary avoids commissioning being split across several organisations, which would weaken purchasing power and reduce the influence needed to shape already fragile care and SEND markets. The Kent Council's countywide support functions would have the critical mass that frontline services need behind them to deliver to a high standard. It will also be able to continue to invest in specialist roles to support complex needs including in SEN, social care practice development and spatial planning. In any other option, functions like performance, quality assurance, analytics, safeguarding, transformation and IT would need to be duplicated, diluting expertise and increasing cost. Medium-sized unitaries are also more likely to see declining Ofsted and CQC ratings, reflecting reduced service quality and organisational stability.

The Kent Council is an opportunity to maximise the available pool of staff with the skills needed to lead and deliver high quality services. By creating a sustainable and attractive single employer for local government in Kent and Medway, the Kent Council can better work with education and skills providers and public sector partners to overcome the long-standing recruitment and retention issues that the area faces. Conversely, any multi-unitary option would force competition between councils and require a large number of new senior roles to be established which the area could not readily support.

There is clear evidence in Kent and Medway that countywide scale delivers better services. The Strategic Business Case sets out various examples. These include the improvements to our children's services through a single Front Door for consistent and well-resourced triage of referrals, countywide commissioning for specialist SEN provision to end postcode lotteries, and efficient use of capital funding for schools based on need.

Scale is also essential for managing Kent's unique border pressures. Kent's Strategic Resilience Team (SRT), its leadership role in the Kent & Medway Resilience Forum, and its ability to implement Operation Brock all depend on a single authority with countywide oversight, trusted by Government and port operators to handle commercially sensitive data and coordinate decisions across transport corridors. The county's track record in delivering national infrastructure - Sevington Inland Border Facility, Border Control Posts, Manston contingency arrangements - likewise relies on scale, supply-chain access and established frameworks. Managing Unaccompanied Asylum-Seeking Children requires capacity, specialist teams and strategically located Reception Centres; smaller unitaries could be quickly overwhelmed by the volume and volatility of arrivals. Any multi-unitary option would split the border infrastructure that is located in Kent between different unitaries, giving Government multiple points of contacts to coordinate with on the practical management of border pressures.

Our concerns with multi-unitary options

Our response has set out the reasons why KCC believes that splitting Kent into multiple unitaries will bring unnecessary risks and costs to the delivery of key services. A further concern is that there is no readily available method to effectively mitigate the disbenefits and risks of disaggregation. At least in the medium-term Kent and Medway will not have a Strategic Authority that could have played a role in maintaining the critical scale and strategic outlook for some place-based services and economic growth. It is also the informed view of KCC that disaggregation of demand-led, people-based services such as social care and SEND cannot be mitigated by shared service arrangements between unitaries. There are no successful examples of such shared services arrangements for social care, and they are often associated with increased cost and reduced quality of service. People-based services like social care are at the heart of councils and represent a substantial proportion of their spend, workforce and relationship with their communities. Outsourcing these to a shared arrangement would create an unsustainable loss of control and accountability for the constituent authorities and could constrain them in delivering their vision for improved local services. On a practical level, while establishing shared services arrangements would be a challenge in any area, given the disproportionate demand and cost pressures that some individual unitaries would face through disaggregation, it seems highly unlikely that any voluntary shared arrangement would be robust enough to keep all Kent and Medway unitaries committed over the long-term.

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

Subcriteria:

Proposals should consider issues of local identity and cultural and historic importance.

Proposals should include evidence of local engagement, an explanation of the views that have been put forward and how concerns will be addressed.

Kent County Council **strongly agrees** that the proposal for option 1a has been informed by local views and will meet local needs. The main reasons for this are set out below.

While time for engagement at this stage of the LGR process has been constrained, KCC undertook an intensive period of engagement in Autumn 2025 so that the views and preferences of our residents and key partners could be included in the Strategic Business Case for option 1a. The most important considerations for people in Kent and Medway about the future of local government and LGR are:

1. **Cost efficiency and financial sustainability** - Residents and stakeholders expect LGR to deliver a more cost-effective system. 91% of respondents of the resident survey said it is particularly important to them that their council achieves good value for money for the taxpayer, while 64% agreed that any changes to local government in Kent must save money in the long-term compared to how things are run now. Reducing duplication, improving procurement, and ensuring fair distribution of resources are seen as essential to achieving long-term financial sustainability.

Option 1a is clearly the most cost-effective proposal for Kent and Medway and the Kent Council would have strong financial sustainability and deliver demonstrable value for money for residents.

2. **Service quality and integration** - There is a strong desire for high-quality, well-coordinated services to support strategic planning and improved outcomes, particularly in key services such as health, social care, education and transport. 95% of respondents to the resident survey said it is particularly important to them that their council delivers high-quality services.

The Kent Council would have the capacity, skilled workforce and scale to deliver high quality services and invest in improvement and innovation. It would combine countywide strength with localised delivery.

3. **Clarity and simplicity of governance** - Stakeholders expressed a desire for clearer, more streamlined local government structures. Simplifying service responsibilities was seen as a way to reduce confusion, improve transparency, and enhance accountability for communities.

A single unitary model would reduce duplication, increase consistency and make it easier for residents and partners to understand who is responsible for services. The Kent Council would include streamlined and effective governance arrangements and support councillors to focus on critical issues and their role as community champions.

4. **Preserving community identity and connections** - Maintaining Kent's historic county identity and respecting local connections is a shared priority. Residents value their sense of belonging at local and county levels, and stakeholders emphasise the need for any new model to reflect the diversity of communities. Stakeholders also emphasised the need for any new model to preserve established partnership working

and existing structures at a Kent and Medway level, particularly those that support business, skills and growth.

Option 1a is the only proposal that would maintain the historic identity of Kent as a county, which is important to residents and partners. It would protect and enhance the effective and well-established partnership delivery arrangements at Kent and Medway level. At the same time, Area Assemblies reflect more local identities for East, West and North – consistent with travel patterns and the operational delivery footprints of public sector services.

5. **Local representation and democratic engagement** - Ensuring councils remain responsive to local needs is critical. Residents want their voices heard in decision-making - 94% of respondents to the resident survey said it is particularly important to them that their council enables them to have a say in decisions that affect them. Stakeholders stress the importance of robust engagement and locally grounded structures to preserve accountability.

The Kent Council proposal sets out a modern, practical approach to community engagement that will be embedded into everything it does. It will have the capacity and flexibility to invest in engagement that is meaningful and suits the way people want to interact with their council. This will allow it to not only listen but also act on the views and priorities of local people.

7. To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements, for example, the establishment of a strategic authority?

Subcriteria:

Where no CA or CCA is already established or agreed then the proposal should set out how it will help unlock devolution.

Proposals should ensure there are sensible population size ratios between local authorities and any strategic authority, with timelines that work for both priorities.

Kent County Council **strongly agrees** that establishing the Kent Council will support devolution arrangements. The main reasons for this are set out below.

Kent and Medway is devolution-ready

KCC would welcome the devolution of responsibilities and budgets to an appropriate body in Kent and Medway. Given the context in which the area is working, KCC believes that the most appropriate body is the Kent Council that would be created through the 1a proposal. In this model, the Kent Council would provide the strategic capacity necessary for the devolution to local areas that Government is aiming to achieve, without the costs and risks of splitting the county into multiple unitaries first, which for our unique county is a damaging and unnecessary trade-off.

While in many other parts of the country, authorities need to combine to achieve the appropriate spatial scale for a strategic authority, Kent and Medway is already operating at this size, with a population in excess of the 1.5 million set by Government for a Mayoral Strategic Authority. Kent and Medway is the Functional Economic Area and that is the geographical basis on which the official growth board (Kent and Medway Economic Partnership) works. There is nothing in the Devolution Framework that could not be delivered by the Kent Council working within the established Kent and Medway partnerships. For example, the Kent and Medway Economic Framework is a Local Growth Plan in all but name, we are preparing to deliver a Spatial Development Strategy (SDS) and the Kent Invicta Chamber of Commerce is leading on a Kent and Medway Local Skills Improvement Plan. Kent and Medway also has a strong track record of convening partners across public services, business, and community sectors to find solutions to complex challenges and seize opportunities for the county – which is one of the main aims of a Strategic Authority.

Given recent delays to Mayoral elections in Tranche 2 areas, there is increasing uncertainty about the timetable for devolution in Tranche 3 areas such as Kent and Medway. Rather than wait for new structures to be established, which if they come will add cost and complexity, the proposal set out in Option 1a provides a devolution-ready solution. It would provide continuity of a strategic countywide structure which is vital for Kent and Medway and quickly achieve Government's objectives for devolution. The Kent Council would hit the ground running, working in partnership with Government and wider partners to deliver public service reform and address our distinct geographical and socio-economic challenges. A priority for the Kent Council would be to seek a bespoke relationship with central Government and an Integrated Settlement to fully maximise the area's potential.

At its core, Government's devolution agenda is about shifting power to those who know their communities best and providing the tools that local areas need to deliver devolution. In this spirit, KCC would urge Government to take a pragmatic approach and recognise that Kent and Medway requires a tailored solution fitting for its nationally-significant position. Working together, the proposal in the Strategic Business Case for 1a offers a workable solution that meets the ambitions of both Government and Kent and Medway.

Our concerns with multi-unitary options

It is the position of KCC's administration that creating a separate Strategic Authority for Kent and Medway to combine newly created unitary councils is an inefficient use of public money.

The inefficiency costs are both short-and long-term. Government intends for Strategic Authorities to be responsible for council functions including transport and local infrastructure, skills and employment, housing and strategic planning and economic development and regeneration. KCC has set out the reasons why these functions should continue to operate at a countywide level. However, the default position if multiple unitary councils are established will be to disaggregate these functions, only to later aggregate them back into the Strategic Authority, if and when one is established. This creates obvious inefficiency and confusion for partners, residents and staff. While it could be possible for temporary shared services arrangements to be put into place, as the timescales for the development of

Strategic Authorities appear to be creeping back and with no definitive timeline in place, it is likely to be difficult to hold such voluntary arrangements together effectively.

We have concerns that the unitary authorities created through the multi-unitary options could lack the financial resilience and organisational capacity to be effective constituent authorities under the Strategic Authority. The new unitary councils would need to operate as delivery vehicles for Strategic Authority priorities and focus on leading their own place-based services as well as playing their role in setting the strategic direction of the county. Given our analysis of the financial pressures that some unitaries in the multi-unitary options would likely face, having one or two constituent partners who cannot fulfil their full role could undermine the effectiveness of the Strategic Authority.

Finally, experience has shown that the most successful Strategic Authorities are underpinned by constituent unitaries with plenty of common ground, facing similar issues and challenges. This supports joint working and prioritisation and ensures a collective approach. Kent and Medway's separate unitary councils would face vastly different issues and challenges – coastal deprivation and border pressures in the East, constraints to growth and rural needs in the West and the influence of London and urban deprivation in the North. Leaders of these unitaries will rightly want to stand up for the needs of their area, and therefore might struggle to agree on countywide priorities, whereas a single unitary would balance needs across all areas, setting a clear and unified vision for the county.

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

Subcriteria:

Proposals will need to explain plans to make sure that communities are engaged.

Kent County Council **strongly agrees** that the proposal for option 1a enables stronger community engagement and gives the opportunity for neighbourhood empowerment. The main reasons for this are set out below.

Investment in engagement and empowerment with real purpose

Importantly, the community engagement arrangements for the Kent Council avoid imposing new or unfamiliar structures. Instead, they strengthen those that already carry community legitimacy, such as Town and Parish Councils, VCSE organisations, neighbourhood associations and local networks. It is KCC's view that it is not necessary or prudent to create new formal structures such as neighbourhood boards layered on top of existing arrangements. The Kent Council approach would harness the advantages of operating at scale while building on the county's strong existing local relationships, ensuring engagement that is inclusive, consistent and effective. It would move away from traditional, meeting-heavy engagement models and piecemeal consultations that struggle to reach most residents and instead invest in engagement as a core organisational function, supported by a Strategic Engagement Framework and a dedicated Community Engagement Team with Community Navigators in every area.

Crucially, engagement is not positioned as an 'add-on', but rather is hardwired into policy development, service design, and ongoing decision-making. Paired with the significant resource for innovation and Public Service Reform that the Kent Council will bring, this allows communities to influence the direction of key local services at an early stage, with real capacity to act on what residents and communities want and need. The presence of a Member Support Unit, streamlined contact routes for residents and simplified governance will mean that councillors can focus on advocacy, dialogue and community leadership rather than navigating bureaucracy.

Engagement that fits real life

The Kent Council's model reflects long-established principles of effective community engagement: early involvement, co-design, inclusivity, transparency, and continuous learning. These principles are formalised through the Strategic Engagement Framework, ensuring they are consistently applied across all services and all parts of the county. The Kent Council would have the scale and capacity to invest in accessible consultation tools and support this consistent practice across the county.

The engagement toolkit deliberately offers varied and flexible methods based on what works here and learning from other areas, such as digital platforms, citizens' assemblies, Leader's Question Time, community workshops, outreach in seldom-heard communities, and participatory approaches. This infrastructure ensures that engagement is available in ways that work for residents - online, in-person, and through trusted local networks - reflecting modern expectations of accessibility, convenience, and responsiveness.

Our concerns with multi-unitary options

Smaller does not automatically mean more local. While the new unitary authorities that would be created in the multi-unitary models would serve smaller communities than the proposed Kent Council, they are still substantial populations. Any new authority will need to invest significant resources and attention to developing their community engagement approach as a core component of their operating model. The concern is that the individual unitaries may not prioritise this – either because they will assume that they are operating locally enough, or because they will lack the financial capacity and leadership headspace required due to the pressures on their statutory services. It is also frustrating and disengaging for residents, councillors and staff if a council hears local views but does not have the resources available to act on them. A smaller council may choose, or only have the resources to, use a 'one size fits all' approach to engagement, without the capacity to flex to the specific needs of local communities and groups of people. This could result in a widening of inequalities in voice and influence and unequal opportunities for residents to influence decisions depending on where they live, with more deprived areas potentially left with weaker engagement structures.

Multiple unitaries would create separate engagement frameworks, strategies and channels for communities across Kent and Medway which risks inconsistent approaches, duplicated effort and loss of a unified countywide voice on shared issues. Many of the issues that matter most to residents - transport, health and social care, community safety - would cut

across the unitary boundaries. Engagement on these topics could become disjointed, resulting in mixed messages for residents and undermining community empowerment.

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

Kent County Council **strongly disagrees** that the proposals for boundary changes in options 4d and 5a set out a strong public services and financial sustainability justification for the changes. The main reasons for this are set out below.

Additional costs and disruption to implement boundary changes

Kent and Medway's shared financial analysis estimated an additional £5m in implementation costs for boundary changes in both the 4d and 5a models. This £5m was a uniform estimate for boundary changes rather than a detailed analysis of the individual proposals. Given the 4d model entails boundary changes across seven of the 13 local authority areas in Kent, and some existing districts would be split across three separate new authorities, this may well be a conservative estimate of the costs. Option 5d also introduces further cost and complexity by proposing to split the current Medway Unitary Authority in two, effectively adding an extra layer of disaggregation. KCC does not believe that there is any justification for burdening new local authorities and council taxpayers with these additional and unnecessary costs.

The boundary changes would also have opportunity costs. It would likely take several years to conduct the boundary reviews and to then implement the modifications – creating distraction and wasting resources that should be used for improving outcomes for residents.

It is not necessary, or justifiable, to introduce the boundary changes proposed

Public services have been successfully delivered across Kent and Medway on the existing district boundaries for decades, and there is no need to change them. The 4d and 5a business cases lack evidence-based arguments for why the proposed boundary changes are necessary or how the risks to service delivery can be effectively mitigated. For example, the 4d model proposes to split the towns of Folkestone and Hythe into separate authorities, and the 5a model proposes to split Rochester and Strood into separate authorities along the River Medway. These urban areas are effectively single conurbations. Splitting these areas as proposed would mean that residents living in neighbouring streets would find themselves in different authorities, would receive separately delivered services and would pay different rates of council tax, disrupting local service delivery and causing confusion for residents. It is also not credible to suggest that the boundary changes proposed would reflect local identity. For example, using the M2 as a boundary line for North Kent, as in 4d, splits apart established communities and travel to work areas that naturally span both sides of the M2.

Crucially, the proposed boundary changes would create authorities which do not align with well-established local government service provision areas or with those of our key partners, which all broadly operate on a North, East and West Kent footprint. For example, NHS sites and acute catchment areas (see figure 9 in 4d business case) clearly show that healthcare

provision is based on a North, East and West Kent split and that existing health geographies do not map across to the proposed new boundaries. Kent Police Command Units are also split across North, East and West Kent, which means Police Command Units would have to work with up to three different authorities (in 4d).

Devolution and Local Government Re-organisation Cabinet Committee 2025/26 Work Programme

14 MAY 2026	
<ul style="list-style-type: none"> LGR update (national update including progress in DPP areas) 	
<ul style="list-style-type: none"> Update on Service Complexity Assessments (KCC internal preparation for LGR) 	
<ul style="list-style-type: none"> Procurement of a Strategic Partner for Local Government Reorganisation in Kent and Medway 	
<ul style="list-style-type: none"> Work Programme 	Standing Item

15 JULY 2026	
<ul style="list-style-type: none"> LGR update (national update including any information known on a government decision for Kent and Medway) 	
<ul style="list-style-type: none"> Update on Service Complexity Assessments (KCC internal preparation for LGR) 	
<ul style="list-style-type: none"> Work Programme 	Standing Item

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