

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

Monday, 28th July, 2025

10.30 am

Council Chamber

AGENDA

DEVOLUTION AND LOCAL GOVERNMENT RE-ORGANISATION CABINET COMMITTEE

Monday, 28 July 2025 at 10.30 am
Council Chamber, Sessions House, County Hall,
Maidstone.

Ask for: **James Clapson**
Telephone: **0300 041 7387**

Membership (17)

Reform (12):	Mr M Harrison, Mr O Bradshaw, Mr M Brown, Mr W Chapman, Mr P Chamberlain, Mr J Eustace, Mr J Henderson, Mr C Hespe, Mrs S Emberson, Miss A Randall, Mr B Black, Ms P Williams
Liberal Democrat (2):	Mr M Ellis and Mr A J Hook
Labour (1):	Mr A Brady
Green (1):	Mr R Lehmann
Conservative (1):	Mr H Rayner

UNRESTRICTED ITEMS

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

- 1 Election of Chair
- 2 Election of Vice Chair
- 3 Apologies and Substitutions
- 4 Declarations of Interest
- 5 KCC options appraisal and criteria assessment of current Local Government
Reorganisation options (Pages 1 - 238)

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
General Counsel
03000 416814

Date: 18 July 2025

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From: Linden Kemkaran, Leader
Amanda Beer, Chief Executive

To: **Devolution and Local Government Reorganisation Cabinet Committee – 28 July 2025**

Subject: KCC options appraisal and criteria assessment of current Local Government Reorganisation options

Classification: **Unrestricted**

Summary:

The paper provides an update on recent developments in regard to Local Government Reorganisation (LGR) at the national and local level, including the process for developing a shared evidence base and business case(s) at a Kent and Medway level between KCC, Medway Council and Kent's District and Borough Councils, ahead of the submission deadline date of 28 November 2025.

The paper also sets out the findings of research conducted internally by KCC on the current unitary council options being considered in Kent and Medway against the criteria set out by Government for reorganisation proposals. The intention of this research is to aid members' understanding of the significant issues impacting the LGR process from a KCC perspective and support associated policy development.

Recommendations:

The Cabinet Committee is asked to:

- (1) **Discuss** and consider the options appraisal, rationale and associated evidence base.
 - (2) **Note** the commitment from KCC to fully take part in the process to develop a shared options appraisal with partners.
 - (3) **Note** the commitment to bringing future papers to this Committee and Cabinet as the work progresses to inform the development of KCC's policy position and next steps.
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1. Introduction

- 1.1 The County Council last considered Local Government Reorganisation (LGR) at the full council meeting on 13 March. This report provides an update on progress since then, and presents internal research conducted by KCC.

Background to Local Government Reorganisation

- 1.2 On 16 December 2024, Government published the English Devolution White Paper: *Power and Partnerships: Foundations for Growth*. The English Devolution White Paper sets out an ambitious agenda to reshape

local government in England through:

- Broadening devolution so that all areas of England have a devolution settlement
- Deepening devolution, through development of a stronger set of powers and resources available to local areas through the new Devolution Framework published in the White Paper
- Progressing local government reorganisation in two-tier areas to support a move to simpler structures, unlock further devolution and deliver sustainable public services.

- 1.3 Subsequently on 10 July, Government published the English Devolution and Community Empowerment Bill to enact their intentions around devolution and LGR and several other community issues. Amongst other clauses, the Bill describes the different types of Strategic Authorities that will be introduced and the powers that they and the new Mayors will hold. There are also provisions to require all councils to move to a Leader and Cabinet model of Governance, and a duty for local authorities to make appropriate arrangements for effective governance of any neighbourhood area.
- 1.4 On LGR, the Bill sets out the process by which new unitary authorities will be established, which is as was expected from the White Paper. Importantly, the Bill reinstates the Secretary of State's ability to direct authorities in two-tier areas to submit a proposal for LGR.
- 1.5 Councils in Kent and Medway received a statutory invitation to submit proposals for LGR in a letter from the Minister of State on 5 February 2025. The schedule attached to the letter set out further detail on the criteria by which Government will assess LGR submissions, which are set out later in this report. The letter and schedule also provided guidance for councils for the development of proposals, including an expectation that councils in Kent and Medway will cooperate in developing proposals that cover the whole area. The letter set out the timeline for the process, which requires submissions to be sent to Government by 28 November 2025.
- 1.6 Areas were required to submit their Interim Plans for LGR to Government by 21 March indicating their initial thinking and providing an opportunity to seek clarity from Government on the process. The Kent Council Leaders and Joint Chief Executives groups, which are well-established partnerships representing all 14 of Kent and Medway's Councils, provided a joint response on 21 March. This joint response expressed the councils' willingness to work together and identified some issues for consideration in Kent and Medway, but did not at that point collectively indicate any specific options being considered. Alongside this, some groups of District Councils, KCC and Medway Council submitted separate letters to Government expressing their initial views on LGR.

- 1.7 On 15 May 2025, Kent and Medway councils received a response from Ministry of Housing, Communities and Local Government (MHCLG) to their Interim Plan submissions. This was a pro-forma response sent to all county areas, with the noticeable exception of it raising concerns about the impact of the Kent ports on services such as highways and children's social care, and a request for reorganisation proposals to set out how such impacts could be mitigated through future council structures.

Devolution

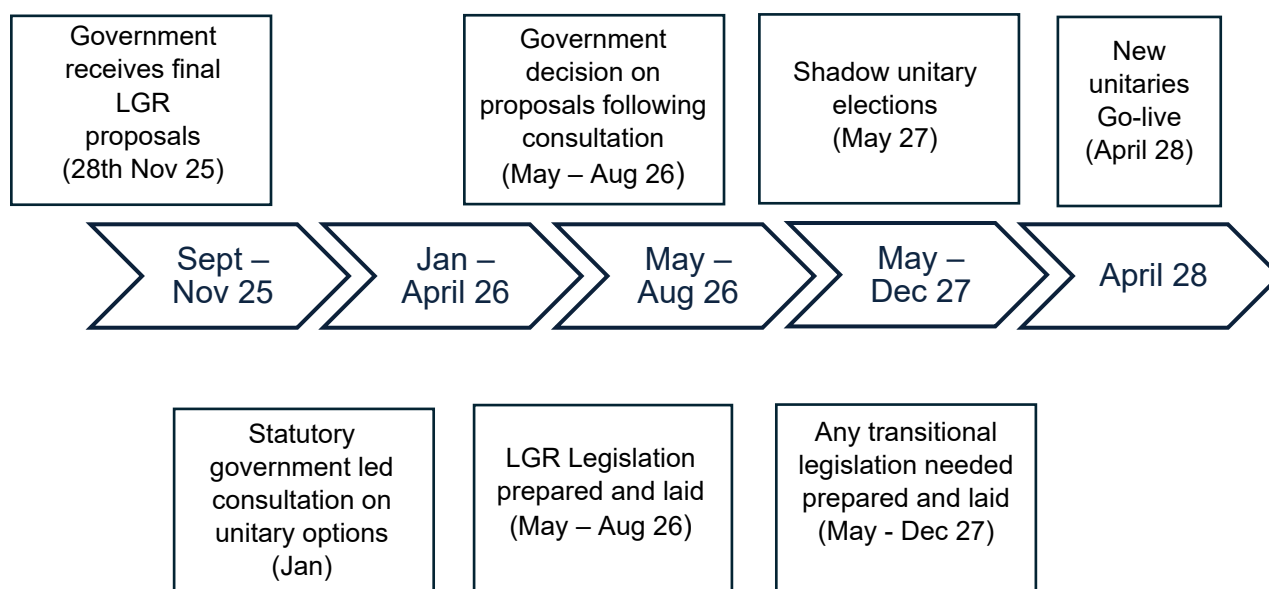
- 1.8 Kent and Medway Councils submitted a joint request to MHCLG on 10 January 2025 for the area to be included in the Devolution Priority Programme (DPP) which has been set up to allow some areas to progress devolution as quickly as possible. On 5 February DPP areas were announced and Kent and Medway was not chosen for inclusion. The feedback letter indicates that Government wishes to see LGR in Kent and Medway to deliver unitary councils with more equal population sizes before devolution can commence.
- 1.9 It remains Government's intention to progress devolution across England by the end of the current Parliament term, but there is currently no timetable for this process in areas that are not on the DPP, and this will not happen until after the process has been completed in the DPP areas.
- 1.10 LGR and devolution are linked but separate processes. The invitation to Kent and Medway councils to submit proposals for LGR by 28 November will not include proposals for devolution, which would happen separately at a later date. However, Government is clear that LGR should support devolution ambitions, so it remains an important consideration for LGR proposals. Government's wider ambition is for both LGR and devolution to facilitate Public Service Reform, whereby public services are integrated around people's lives and focus on prevention, with power devolved to local areas that can design services to best meet the needs of their communities.

Timescales

- 1.11 KCC's Leader wrote to the Minister of State on 5 June 2025 to request an extension to the 28 November deadline by which LGR proposals are required. On 14 July, the Minister responded confirming that the deadline would not be extended and the time available is considered adequate.
- 1.12 One of the primary reasons that the Leader requested an extension to the process was to allow sufficient time to engage with residents and partners. There has been little direct engagement on issues related to LGR with residents over recent years, so there is little existing evidence of the views and priorities of the people of Kent that can be used to shape LGR proposals. Given the constraints of the timescales required, this continues to present a significant

challenge in meeting Government's expectations that LGR proposals will take into account resident views.

1.13 The timeline for the LGR process is set out below, based on information provided by MHCLG.



2. Kent and Medway response

- 2.1 Government have set a clear expectation that councils in a local area will work together to develop LGR proposals and that they will all contribute to and draw evidence from a shared evidence base and options appraisal to prepare their business cases.
- 2.2 MHCLG has awarded councils in Kent and Medway £514,410 as a contribution to the development of proposals.
- 2.3 Kent Council Leaders continue to be committed to responding collectively, building on a strong history of close partnership working across Kent and Medway. A collective decision has been made to jointly appoint an external partner to develop the shared evidence base and options appraisal using the MHCLG funding. Based on this initial work, the external partner will develop a number of business cases for LGR in Kent and Medway covering the different preferred options agreed by the councils. Business cases can be submitted by individual councils or groups of councils, and each council will only be able to support one business case. KPMG have recently been appointed as the external partner to deliver this work.
- 2.4 Due to the time taken through the process of applying to be a DPP area and then the time taken to agree the joint approach and complete the procurement process, KPMG's work will progress at a rapid pace over the summer and

autumn to ensure the 28 November deadline for proposals is met. It is anticipated that the options appraisal will be completed by the end of August / early September, at which time councils will be required to decide which options will progress to full business case development. There is therefore pressure on councils to develop their individual policy positions on LGR.

3. KCC internal research

- 3.1 Since the start of discussions on LGR in Kent and Medway and the submission of the Interim Plan, KCC has had a new administration. It is necessary for the new administration to form a policy position on LGR in Kent and Medway.
- 3.2 In order to brief KCC Members so they can make an informed decision on KCC's policy position, KCC research has been undertaken to develop an internal evidence base and options appraisal based on Government's criteria for LGR. The Devolution and LGR Cabinet Committee has been set up to allow transparency and debate on LGR and its implications for KCC and Kent. The internal evidence base and options appraisal is being shared now at the Cabinet Committee set up for this purpose to further the debate and inform the development of a policy position. Putting this information into the public domain at this point also allows it to form part of the shared evidence base for Kent and Medway councils, contributing to the development of robust business cases that take into account research on the potential impacts on KCC services.
- 3.3 The approach taken has been to develop an options appraisal scoring methodology and comparison of the potential options for LGR against the criteria. This is because Government considers that an options appraisal is the best way to identify challenges and opportunities against the criteria they will be using to assess LGR proposals.
- 3.4 In order to provide an informed judgment on scoring, an evidence base has been developed pulling together evidence relevant to the Government's criteria that is currently available to KCC. The evidence base comprises the following assessment reports and pieces of analysis which are attached to this report as Appendix 3:
- 3.5 Financial assessment
This incorporates analysis by KCC's Finance division and externally commissioned modelling. Internal analysis by KCC's Finance division considers:
 - the debt and reserves position of Kent and Medway councils and implications for the LGR options considered.
 - Council Tax modelling in each option.
 - Detailed analysis on the cost pressures for adults' social care, children's social care, home to school transport and waste management (still in development) that would be likely to occur for the new unitary councils under each of the options considered.

Externally commissioned financial modelling by PwC provides an overview of potential benefits and costs for each option (including transition costs) and calculates the estimated pay-back periods. In addition, analysis of the implications of LGR for people-based services by Newton (focusing on social care and SEND) provides estimates of demand and costs to provide these services for the proposed unitaries in each option.

3.6 Engagement assessment

As explained earlier in the report, it has not been possible to engage with residents and partners on LGR so far. However, Government criteria on LGR proposals includes consideration of the support for the different options being considered. This assessment pulls together findings from relevant recent consultations in Kent including the annual Budget consultations and consultations on service changes, as well as national evidence, to provide a 'proxy' engagement position to support the internal options appraisal as far as possible. It does not aim to replace engagement with residents and partners which will need to be undertaken as part of the LGR process.

3.7 Democracy & local identity assessment

This assessment provides evidence for criteria around the importance of local identity, culture and heritage in developing proposals for new unitary geographies. It considers travel to work, schools and hospitals to identify the natural travel patterns of Kent and Medway residents. It also considers the potential ratios of councillors to residents in the unitaries for the options included compared to Boundary Commission guidance. Opportunities for community engagement and neighbourhood empowerment are assessed.

3.8 Transformation assessment

It is the expectation of Government that LGR will provide an opportunity to transform services and address some of the long-standing challenges that local government faces. This assessment has considered the opportunities and disbenefits that each option could have in realising the potential for transformation. It also looks at potential for wider public sector reform with partners.

3.9 Devolution policy assessment

As explained previously, Government expect LGR proposals to support the area's devolution ambitions. This assessment has considered the extent to which each option would support devolution and how effectively the unitary councils in each option could operate as part of a Mayoral Strategic Authority at a later time.

3.10 Additional pieces of analysis

In order to ensure evidence was available to cover all parts of the Government criteria, some additional evidence and analysis was collated. Options profiles with population and demographic information were developed to provide an overview of the proposed unitary areas in each option and some of the disparities between them. Analysis on housing growth was conducted based on previous housing delivery and predicted growth to identify any challenges in delivering housing that the unitaries considered might face.

3.11 There are some significant caveats to the internal evidence base and options appraisal which are explained below and should be kept in mind when considering this work:

3.12 A recommendation is not given

The options have been scored but there is no recommended option. The evidence and options appraisal are presented objectively to support Members to form their policy position.

3.13 Scoring is based on current information

The scoring is an evidence-based estimate of how the options considered would likely score against Government's criteria, based on analysis of current information available to KCC. The scoring could change as new information becomes available. Significantly, Government have launched the Fair Funding 2.0 consultation on proposed changes to relative needs formulas used to allocate council funding. These changes include updating the way in which factors such as deprivation affect funding allocations. This will have an impact on financial modelling for LGR proposals and is a nationally recognised challenge with the LGR process.

3.14 Criteria are equally weighted

Government have been clear that they will not apply any weighting to the criteria for LGR, so each criterion is of equal weight in making their decision on which proposal should be chosen. They, therefore, expect Councils to treat each criterion equally. If individual criteria were weighted, it is likely that scores for the options would be different.

3.15 Government criteria are open to interpretation

There is an element of subjectivity in the criteria that have been set by Government and the exact intention of each criterion could be open to interpretation. This means it has inevitably been necessary for officers to use their judgement in interpreting and scoring the criteria.

3.16 It is impossible to predict future policy decisions

The new unitary councils that would be created through LGR will make policy decisions and design their operating models as they see fit. This will have an impact on the outcomes of LGR that cannot be predicted. For example, the new unitaries will need to set their Council Tax rates and design the mechanisms they will put in place to engage local communities. The options appraisal cannot predict these future decisions and where this is a significant issue it has been flagged in the evidence base and rationale for scoring.

4. KCC internal options appraisal

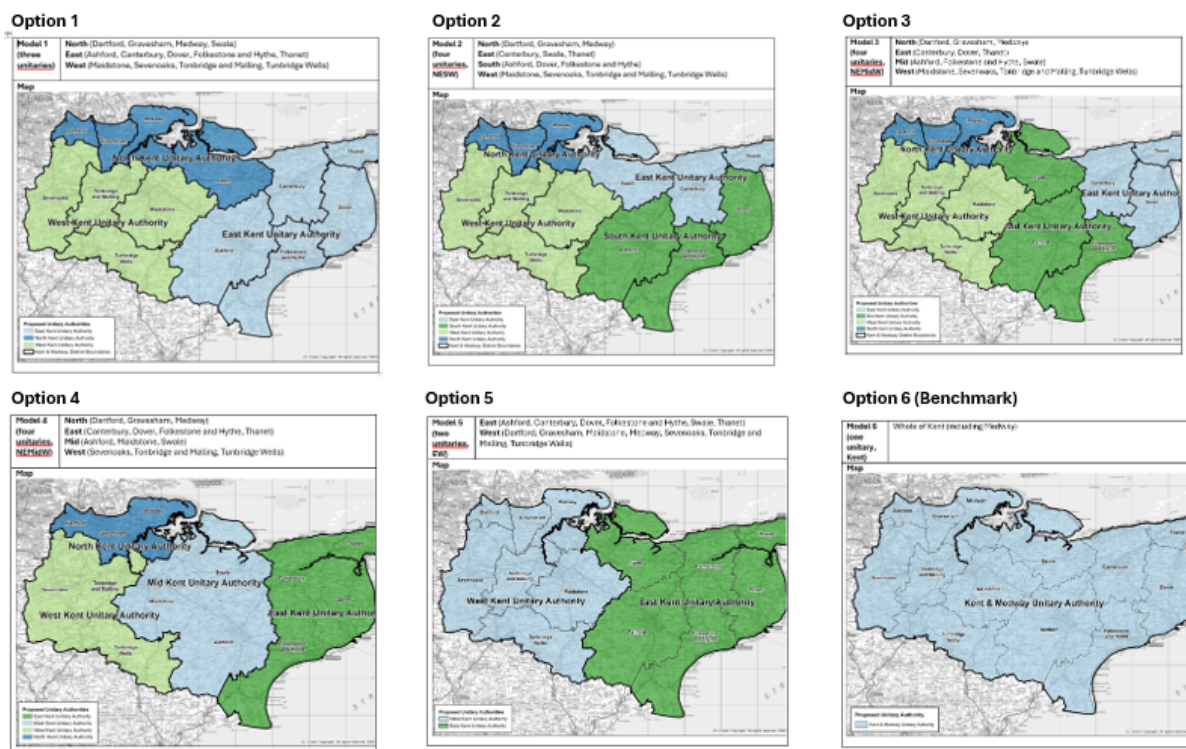
4.1 The internal options appraisal has used the Government criteria which were set out in the schedule attached to the statutory invitation letter for LGR proposals.

The schedule sets out six criteria and under each there is further description. In some cases this description expands on the specific issues intended to be covered within the criterion, and in others it provides guidance to councils on how to provide the information requested. For the internal options appraisal, sub criteria have been developed under each of the six criteria based on Government's description. This has been to assist in arriving at an overall score for each of the six criteria.

- 4.2 The six criteria and sub-criteria used in the internal options appraisal are provided in the detailed scoring table (Appendix 1). The table below provides the six main criteria and how the evidence from the evidence base explained in the previous section was used to inform the scoring.

Government criteria	Evidence used
A. A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government	Option profiles, financial assessment and housing delivery analysis
B. Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks	Option profiles, financial and transformation assessments
C. Unitary structures must prioritise the delivery of high-quality and sustainable public services to citizens	Transformation assessment and financial assessment on disaggregation
D. Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views	Engagement and democracy & local identity assessments
E. New unitary structures must support devolution arrangements	Devolution assessment
F. New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment	Democracy & local identity assessment

- 4.3 The options included in the internal options appraisal are set out in the maps below to give an overview of all six options. Larger versions of these maps are provided in section 5 of this report and in the Options Profiles which are part of the attached evidence base.



- 4.4 Options 1 to 4 have been identified through the joint Kent Council Leaders' discussions and information on these options was submitted to Government by some councils alongside the Interim Plan in March. These were therefore included because they were the options that are known to have been identified within Kent and Medway at this point.
- 4.5 Options 5 and 6 have been included by KCC with the aim of ensuring that the internal options appraisal provides a broad range of options to help Members reach an informed position. Option 5 is a two-unitary option. While the populations of the unitaries would be large, some proposals for LGR in other two-tier areas of the country are likely to include populations of over 800,000 people, so it is not unprecedented to consider unitaries of this size. Government's response to proposals with large population sizes from other areas will be instructive to Kent and Medway.
- 4.6 Option 6, a single Kent and Medway unitary, has been included as a benchmarking option to assess the other options against. Government asked Surrey (which is on a 'fast-track' process to LGR) to provide a single-unitary benchmark so this approach has been copied.
- 4.7 It is important to note that these options may not be the only ones being considered across Kent and Medway, and additional options may be proposed by one or more councils in the future.
- 4.8 The options appraisal scoring was conducted collectively by Strategy, Analytics and Finance leads. Informed by the evidence base, officers discussed and

agreed on scores for each option against each criterion, using a simple 1 to 5 scoring range:

- 5: Entirely meets the criteria
- 4: Strongly meets the criteria
- 3: Sufficiently meets the criteria
- 2: Partially meets the criteria
- 1: Does not meet the criteria

4.9 The overall scores for the 6 criteria are provided in the table below, and a detailed scoring table is attached as Appendix 1.

Criteria	Options					
	Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 - Benchmark 1 unitary (K&M)
A	3	1	2	1	4	5
B	3	1	1	1	4	3
C	4	2	2	2	4	4
D	4	2	2	2	2	2
E	5	2	2	2	2	1
F	3	3	4	4	2	2
Total score	22	11	13	12	18	17

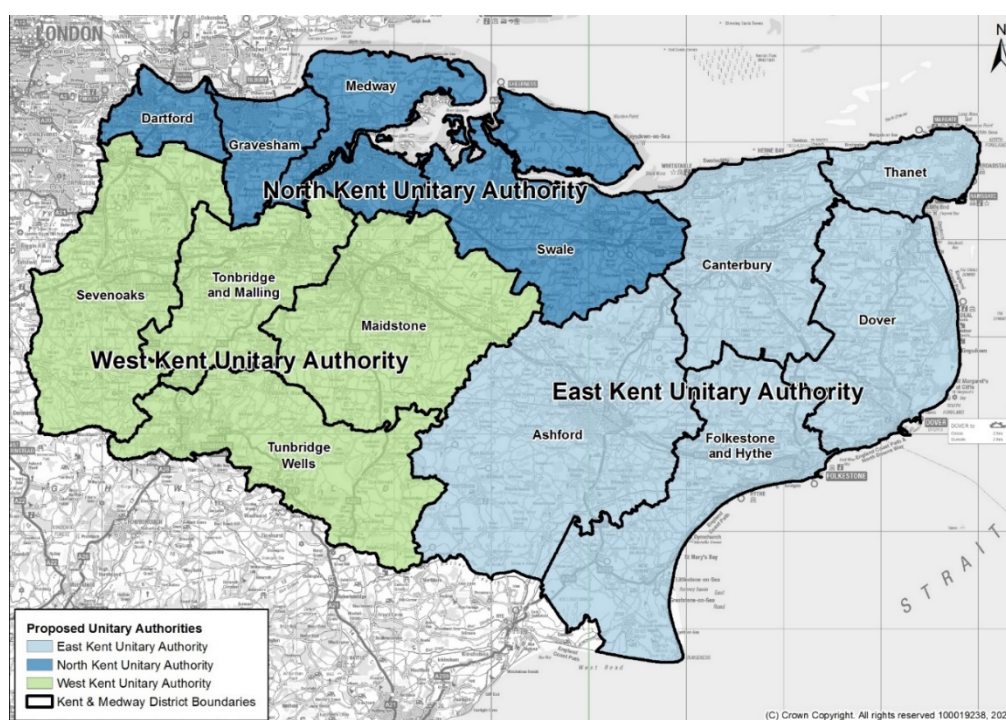
4.10 Appendix 2 provides a detailed rationale for the scoring, explaining why each individual score was given, drawing on the relevant evidence from the evidence base.

4.11 Following completion of the options appraisal, a critical friend review was provided by officers who had not been involved in developing the evidence base or options appraisal, to ensure that the process was as robust, balanced and logical as possible based on the evidence available. Changes were made to the detailed scoring table and rationale based on the feedback received.

5. Options summaries

5.1 To aid understanding of the key issues that have influenced scoring for each of the six options, summaries are presented below. The information has been significantly summarised and detailed explanation is provided in the rationale document (Appendix 2).

5.2 Option 1 – overall score 22/30



Unitary	Areas covered	Population (mid-2022)
North	Dartford, Gravesham, Medway, Swale	663,111
East	Ashford, Canterbury, Dover, Folkestone and Hythe, Thanet	661,559
West	Maidstone, Sevenoaks, Tonbridge and Malling, Tunbridge Wells	551,223

5.3 Of all options, the population split for option 1 is the most well-balanced between authorities (only 20% disparity between the smallest and largest unitary).

5.4 Overall, option 1:

- Best fulfils Government requirements in terms of population size.
- Creates fairly equal authorities with least disparity in some key areas.
- Balances moderate financial sustainability with proximity to local communities.
- Boundaries align well with local living patterns, existing operational delivery arrangements of partners and local identities.

5.5 **Criterion A: A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government**
This option scored 3/5, making it the middle scoring option on this criterion.

This option would create the most equitable income scenario for Kent and Medway when splitting the county into more than one unitary based on total Council Tax yield. When considering the variation of increase in required spend per resident on social care and SEND in year 1 between unitaries, this

option performs better than 4-unitary options, but not as well as 1 and 2-unitary options. This option was low scoring (beating only option 4) when considering housing delivery, as West Kent is likely to experience the greatest challenges in delivering the four-year housing target for development.

5.6 Criterion B: Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks

This option scored 3/5, making it the middle scoring option on this criterion.

Option 1 best meets Government's expectations on population size, with all three unitary authorities meeting the minimum population requirement of 500,000. However, this option performs moderately when considering efficiency and value for money, with a low net recurring benefit and relatively high transition costs with a pay back of over 8 years. Disaggregation costs are moderate compared to the four unitary options. This option performs well (beaten only by the 2-unitary model) when considering opportunities for transformation from existing budgets and invest-to-save projects. However, it scores poorly on debt management with uneven debt distribution concentrated in North and East Kent.

5.7 Criterion C: Unitary structures must prioritise the delivery of high-quality and sustainable public services to citizens

This option scored 4/5, making it the joint highest scoring option for this criterion, alongside options 5 and 6.

The major issues that have shaped scoring on this criterion are the costs and risks of the disaggregation of county-wide services (which increase with more unitaries) and striking a balance between capacity and local responsiveness to deliver high-quality services. The alignment of new unitary boundaries with the existing delivery arrangements of partners (health and police) is also an important consideration in how well the options will unlock potential for public service reform. For these reasons, option 1 has scored well because of its alignment of unitary boundaries with partner boundaries and because it could provide a good mid-point between capacity and scale to manage disaggregation and need within unitary areas.

5.8 Criterion D: Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views

This option scored 4/5, making it the highest scoring option for this criterion.

Option 1 has good alignment with established identities and ways of living, for example this option groups coastal communities and those spanning the Thames Estuary. Option 1 provides an effective middle ground between providing moderate value for money while not being too large and remote for residents and partners to engage with. Partners had previously supported this option when asked. There is a 50/50 split in residents paying more and less Council Tax.

5.9 **Criterion E: New unitary structures must support devolution arrangements**

This option scored 5/5, making it the highest scoring option on this criterion with a considerable lead margin given all other options scored either 1 or 2.

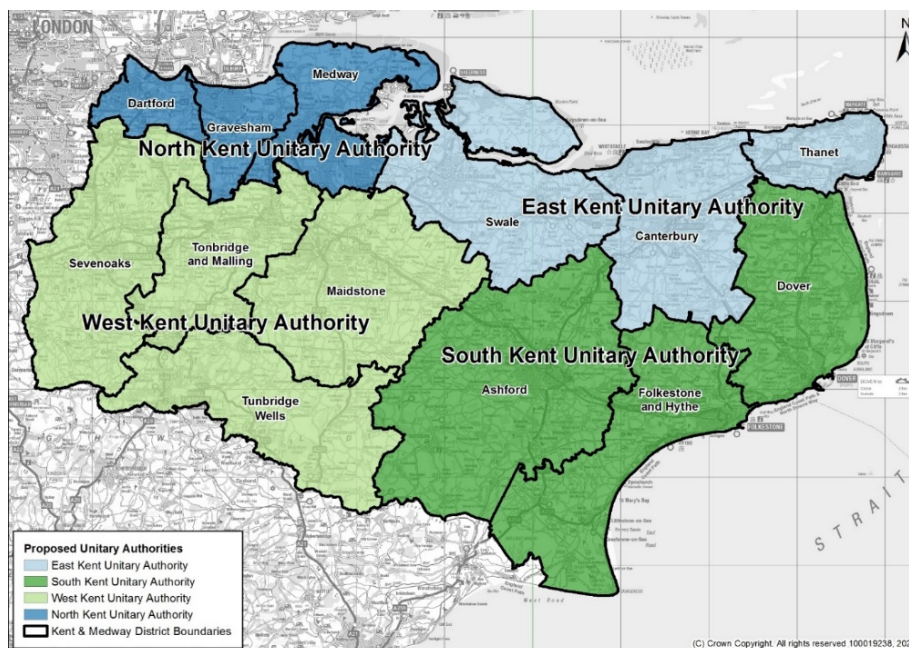
Option 1 creates unitary authorities that best meet the Government's requirement for populations and the populations in this option are also the most balanced, which would support the creation of equal partners under Mayoral Strategic Authority (MSA). The unitaries in this option are functional economic areas, with sensible planning geographies. Unitaries in this option could have sufficient scale and capacity to engage directly with an MSA to deliver devolution priorities.

5.10 **Criterion F: New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment**

This option scored 3/5, making it the middle scoring option for this criterion.

Option 1 scored moderately for this criterion because while the proposed unitary areas could facilitate effective local engagement with specific communities (e.g. coastal communities) compared to low scoring 1 and 2-unitary options, it would still operate further from local communities than in the higher-scoring 4-unitary options. Option 1 provides a councillor ratio close to the upper limit of the Local Government Boundary Commission for England's (LGBCE) recommended ratios.

5.11 **Option 2 – overall score 11/30**



Unitary	Areas covered	Population (mid-2022)
North	Dartford, Gravesham, Medway	508,492
East	Canterbury, Thanet, Swale	452,858
South	Ashford, Dover, Folkestone and Hythe	363,320
West	Maidstone, Sevenoaks, Tonbridge and Malling, Tunbridge Wells	551,223

5.12 This option produces a population disparity of 34% between the smallest and largest unitary authorities (South Kent and West Kent respectively). This is the highest percentage disparity across all six options.

5.13 Overall, option 2:

- Creates the highest concentrations of high-spend areas in individual unitaries.
- As in other 4-unitary models, ongoing disaggregation and one-off transition costs are high and there is no predicted pay-back period.
- Low financial sustainability for some unitaries could prevent opportunities for transformation, efficiencies and delivery of devolution ambitions.
- 4-unitary models will operate more closely to local communities but capacity for engagement could be low.

5.14 **Criterion A: A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government**

This option scored 1/5, making it the lowest scoring option on this criterion.

Option 2 would create the least equitable scenario for Kent and Medway. It would lead to the largest difference in council tax income between the unitaries, with South Kent unitary receiving £173m less than West. Grouping Dover and Folkestone & Hythe, which have the highest adult social care costs, and Thanet and Swale, which have the highest children's social care costs, creates the highest concentrations of high-spend on statutory services for two of the unitaries. This option could perform better than the other four-unitary options for housing growth delivery, but overall, the four-unitary options would be likely to face more challenges in housing delivery compared to other options.

5.15 **Criterion B: Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks**

This option scored 1/5, with all options with a four unitary model scoring equally low for this criterion.

Two unitaries are under the 500,000-population threshold set by Government. As with all of the four-unitary options, option 2 has a negative net recurring benefit with no payback period. All four-unitary options have the highest transition costs and unitaries would see the highest increase in social care and SEND spend across the county due to disaggregation costs. Debt distribution in this option is uneven, with West Kent holding the highest

reserves-to-debt ratio. However, compared to the 3 unitary model, levels of debt fall in East Kent as the number of districts reduces from 5 to 3, with financial risk transferred to North and South Kent. Although all four-unitary models offer greater local agility to respond to transformation opportunities tailored to local need, they also present reduced financial resilience and limited capacity to deliver and absorb upfront costs for invest-to-save projects.

5.16 Criterion C: Unitary structures must prioritise the delivery of high-quality and sustainable public services to citizens

This option scored 2/5, making it the lowest scoring option for this criterion, alongside all other 4-unitary options.

The 4-unitary options present opportunities for increased local responsiveness and hyper-local level partnership working. For example, option 2 broadly aligns with Health and Care Partnership boundaries, although Swale might fit more naturally in the North of Kent. Conversely, the four-unitary options introduce more boundaries and additional players to an already complex system which could make co-ordination more difficult.

- 5.17 The four-unitary models carry the highest risk, complexity, and disaggregation costs, including risk of service disruption, diluted expertise, duplicated systems, data transfer risks, inconsistent service offers, and market destabilisation through the introduction of additional parties and competition. Unitaries may struggle to balance delivery of statutory services with investment in universal services and place-shaping for all residents. These factors could make delivering key services more challenging and limit capacity for investment in prevention or public service reform.

5.18 Criterion D: Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views

This Option scored 2/5, in line with most of the other options.

While some residents value the smaller scale of four-unitary models, value for money and the reduction of back-office costs are also important to residents and the four-unitary options are the least financially viable and deliver lowest efficiency. In this option, 57% of residents could face higher Council Tax. More unitary boundaries could lead to cross-boundary service charges for residents. However, this model (and the other four-unitary options) was developed through joint work by Kent Leaders, suggesting some local support.

5.19 Criterion E: New unitary structures must support devolution arrangements

This Option scored 2/5, this score was shared with Options 3, 4 and 5.

In Option 2, two of the unitaries created do not meet the government's 'guiding principle' of a 500,000 population. The stark disparities in deprivation could lead to a Mayoral Strategic Authority potentially spending a disproportionate amount of focus on East Kent. This option separates the

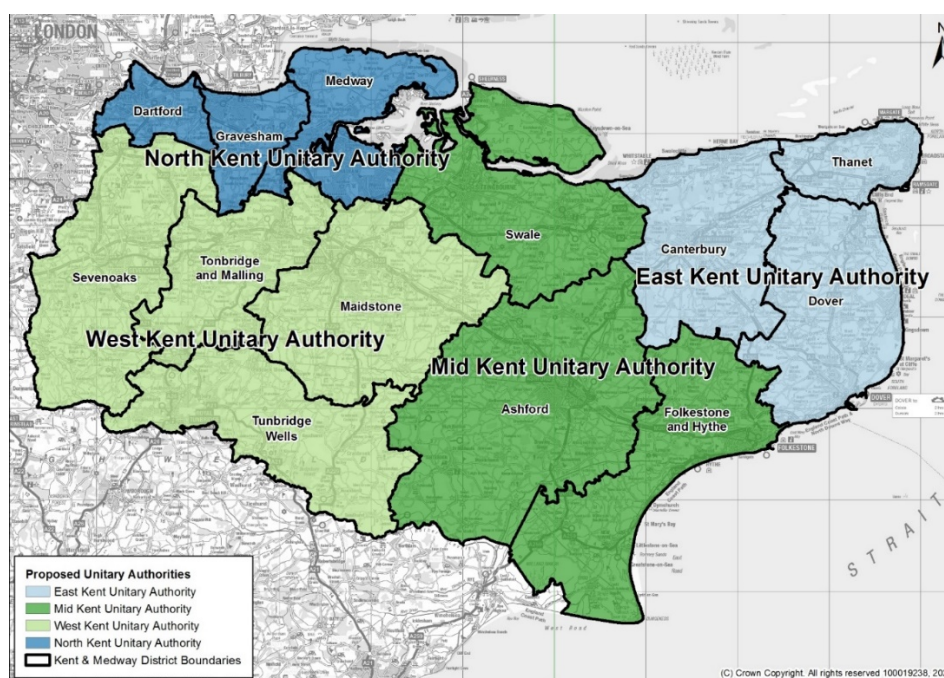
Manston Arrivals and Processing Centre from other border infrastructure, leading to a MSA having to work across multiple unitaries and also creates a small North Kent unitary which may be less engaged with Kent and more so with the Mayor of London.

5.20 Criterion F: New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment

Option 2 scored 3/5; this score was shared with Option 1 and was higher than Options 5 and 6 however lower than Options 3 and 4.

In this Option, the councillor numbers of between 49 and 79 per unitary authority best suit the LGBCE's recommended councillor ratio. However, this option scores lower than the other 4UA options due to the higher deprivation disparity which may result in spending pressures affecting the ability to resource community engagement and localised democracy.

5.21 Option 3 – overall score 13/20



Unitary	Areas covered	Population (mid-2022)
North	Dartford, Gravesham, Medway	506,492
East	Canterbury, Dover, Thanet	415,712
Mid	Ashford, Folkestone and Hythe, Swale	400,466
West	Maidstone, Sevenoaks, Tonbridge and Malling, Tunbridge Wells	551,223

5.22 This option produces a disparity of 27% between the biggest and smallest unitaries (West Kent and South Kent, respectively) which sits towards the higher end of the options, although it is not the largest disparity.

- 5.23 Overall, option 3:
- Spreads areas of highest deprivation and spend more evenly than option 2.
 - As in other 4-unitary models, costs are high and there is no predicted payback period, which could limit potential for transformation, efficiencies, delivery of devolution ambitions and limit capacity for engagement, although unitaries would operate more closely to communities.

5.24 **Criterion A: A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government**

This option scored 2/5, making it one of the lowest scoring options for this criterion.

There is variation in council tax yield between Mid and West Kent, and a variance of 29% between the unitaries on increased spend per resident for social care and SEND in year 1, which is a lower disparity than in the other four-unitary options. As a potential housing authority, this version of East Kent would be on track to deliver 111% of its four-year target, but although this would be one of the higher performers, it might not mitigate limitations of authority boundaries for planning that being divided into four unitaries would create.

5.25 **Criterion B: Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks**

This option scored 1/5, making it the lowest scoring option for this criterion (along with the other two four-unitary options).

Two unitaries would fall short of the required population of over 500,000. Separating Thanet from Swale and Folkestone & Hythe from Dover would help spread the highest cost areas for social care. As with the other four unitary options there would be no net benefit, high transition costs and no payback period. This option would also create an inequitable distribution of debt across the unitaries.

5.26 **Criterion C: Unitary structures must prioritise the delivery of high-quality and sustainable public services to citizens**

This option scored 2/5, making it the lowest scoring option for this criterion (along with the other two four-unitary options).

As with the other four unitary options, while this option could be locally responsive and agile, it would likely lack the capacity and resources to invest in preventative services or public service reform. In addition, this option's creation of a Mid Kent authority could inhibit public service reform as it does not align well with established public service delivery boundaries or partnership arrangements.

5.27 **Criterion D: Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views**

This option scored 2/5, in line with most of the other options.

This option would have the highest proportion of residents paying higher council tax, at 65%. In terms of local identity and cultural and historic importance, this option breaks up established configurations, such as Medway and Swale, and Folkestone & Hythe and Dover, while putting Swale and Folkestone & Hythe into the same unitary which does not align with travel to work, education and health patterns. However, it fairs slightly better than option 2 for deprivation because Swale and Thanet are not in the same unitary. It also preserves the recognised 'East Kent Triangle' of Canterbury, Thanet and Dover as a unitary.

5.28 **Criterion E: New unitary structures must support devolution arrangements**

This option scored 2/5, making it one of the lowest scoring options for this criterion.

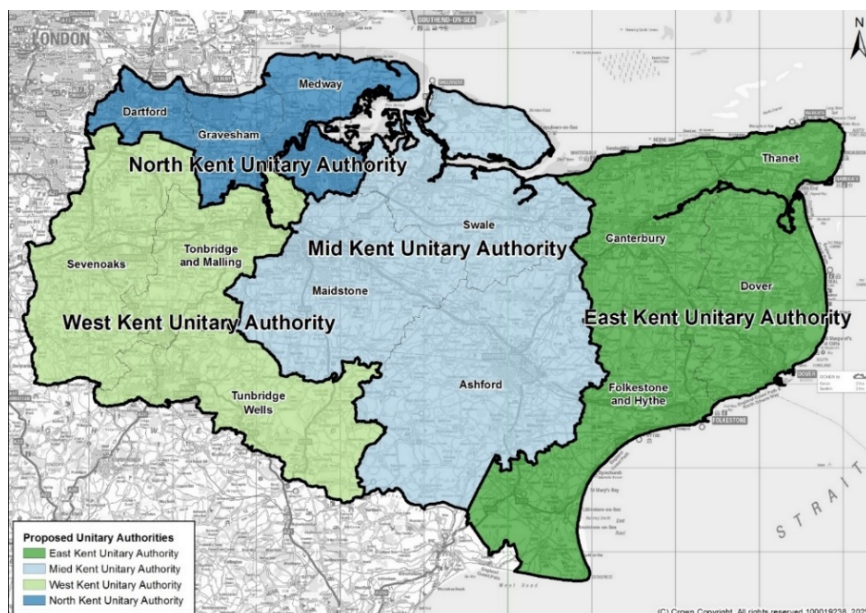
A Mayoral Strategic Authority could spend a disproportionate amount of effort in unitaries with higher need and deprivation and would have to work across multiple unitaries regarding coastal regeneration and border infrastructure, e.g. the Eurotunnel (Folkestone) and Sevington Inland Border Facility (Ashford) would be separated from the Port of Dover and Manston Arrivals and Processing Centre. This option has one of the larger disparities in population sizes between unitaries.

5.29 **Criterion F: New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment**

This option scored 4/5, making it the joint highest scoring option with Option 4.

This option scores joint highest because it puts the unitaries closest to their residents while potentially having greater capacity for engagement due to more manageable social care demand. Out of all the options, its councillor numbers would best suit the LGBCE's recommended councillor ratio.

5.30 **Option 4 – overall score 12/30**



Unitary	Areas covered	Population (mid-2022)
North	Dartford, Gravesham, Medway	508,492
East	Canterbury, Dover, Folkestone and Hythe, Thanet	525,949
Mid	Ashford, Maidstone, Swale	470,657
West	Sevenoaks, Tonbridge and Malling, Tunbridge Wells	370,795

5.31 This division produces a population disparity of 29% between the smallest and largest unitary authorities (West Kent and East Kent respectively). This is the second highest percentage of disparity across all six options.

5.32 Overall option 4:

- Creates the most affluent version of a West Kent unitary, while grouping the areas of highest deprivation and social care spend in the East Kent unitary.
- As in other 4-unitary models, costs are high and there is no predicted pay-back period, which could limit potential for transformation, efficiencies, delivery of devolution ambitions and limit capacity for community engagement, although unitaries would operate more closely to communities.

5.33 **Criterion A: A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government**

This option scored 1/5, making it the joint lowest scoring option on this criterion.

Option 4 presents challenges in achieving a coherent and balanced single-tier structure across the whole area. While the model does show relatively even council tax yield overall, there remain significant disparities in service demand and financial pressures across the proposed unitary authorities, particularly marked in East Kent and in comparison to the most affluent version of a West Kent unitary. Housing delivery and spatial planning also vary across the proposed authorities. The West Kent authority, for example, has historically delivered lower levels of new housing and is projected to continue underperforming relative to targets.

5.34 **Criterion B: Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks**

This option scored 1/5, making it the joint lowest scoring option on this criterion alongside the other four-unitary options.

Two of the proposed unitaries would have populations under the 500,000 threshold. As shown in Option 2, all four unitary options face challenges in terms of financial viability, capacity, and resilience. This option creates the greatest disparity in levels of debt as it places Sevenoaks, Tonbridge & Malling and Tunbridge Wells, which all have very low levels of debt, into one unitary, concentrating higher levels of debt in other areas.

5.35 Criterion C: Unitary structures must prioritise the delivery of high-quality and sustainable public services to citizens

This option scored 2/5, making it the joint lowest scoring option on this criterion alongside the other four-unitary options.

As with the other four-unitary models, this option benefits from the potential to be more locally responsive and is well placed to develop neighbourhood-level service models, but financial capacity will limit delivery of transformation and efficiencies. As in option 3, creation of a Mid Kent unitary does not align well to established public service delivery or partnership arrangements.

5.36 Criterion D: Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views

This option scored 2/5, in line with most of the other options.

54% of people would pay more Council Tax in this option, which is slightly better than the other four-unitary options. However, the groupings are not fully aligned with travel patterns or local identities. The creation of a particularly affluent West Kent authority could entrench socio-economic divisions.

5.37 Criterion E: New unitary structures must support devolution arrangements

This option scored 2/5, making it the second lowest scoring option on this criterion alongside the other four-unitary options.

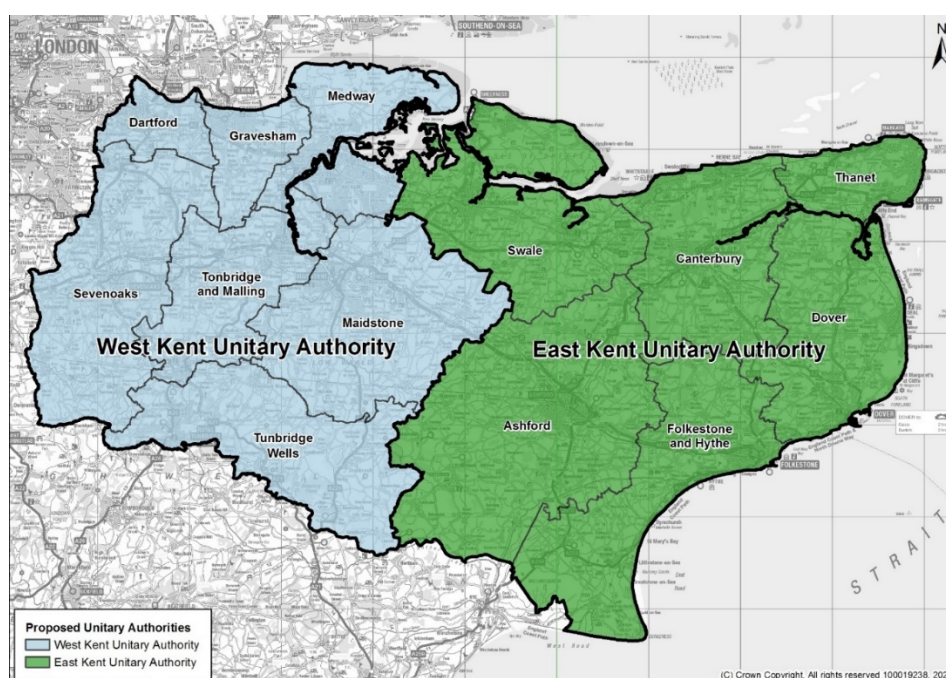
As with other four-unitary models, the proposed authorities could face challenges in maintaining the financial resilience and organisational capacity needed to deliver on MCA priorities. A Mayoral Strategic Authority would have to work across multiple unitaries regarding border infrastructure (e.g. Sevington Inland Border Facility would be separate from all other border infrastructure). There are also structural and geographic factors that may affect engagement at the regional level. The socio-economic differences between East and West Kent are more pronounced in this configuration, which could lead to uneven levels of engagement or focus within a devolved structure.

5.38 Criterion F: New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment

This option scored 4/5, making it the joint highest scoring option on this criterion alongside the other four-unitary Option 3.

As with option 3, this option could provide unitaries that operate close to communities and may have some capacity for engagement. Option 4 also aligns well with recommended councillor-to-resident ratios, with a relatively even distribution across the four areas.

5.39 Option 5 – overall score 18/30



Unitary	Areas covered	Population (mid-2022)
East	Ashford, Canterbury, Dover, Folkestone and Hythe, Swale, Thanet	816,178
West	Dartford, Gravesham, Maidstone, Medway, Sevenoaks, Tonbridge and Malling, Tunbridge Wells	1,059,715

5.40 Option 5 has population ratios significantly higher than 500,000 and creates a 23% disparity in population size between the two proposed unitary authorities.

5.41 Overall, option 5:

- Compared to options 1 to 4, delivers greater efficiencies and value for money, lower transition and disaggregation costs, a relatively short payback period, and potentially easier management of debt. It therefore also has greater potential to support transformation.
- Creates populations greater than the range that Government has indicated could be acceptable and poses some challenges for future devolution.
- Creates large unitaries that could be seen as remote from communities and less agile.

5.42 **Criterion A: A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government**
This option scored 4/5. Only Option 6 scored higher at 5/5.

This criterion considers having a sensible economic area with an appropriate tax base and no undue advantage for one part of the area, and whether the model has a sensible geography which will help to increase housing supply and meet local needs. A 2 unitary model is the option that would best achieve this if the county were to be split into multiple unitaries.

5.43 Criterion B: Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks

Option 5 scored highest overall for this criterion at 4/5.

Whilst option 5 would mean that each unitary area has a population more than 500,000, these are above the range that Government has indicated might be acceptable. Compared to options 1 to 4 it has higher net recurring benefits and relatively short payback period of 3.8 years, along with significantly lower disaggregation and transition costs and a lower estimated increase in total annual spend on children's and adult's social care and SEND. This makes option 5 potentially the most conducive to transformation from existing budgets and invest-to-save projects. It combines the strategic scale needed to deliver large, high-impact transformation initiatives with local responsiveness to tailor services effectively. It supports balanced service demand and financial capacity across both authorities, enabling more equitable and sustainable investment in transformation. This option results in the most balanced distribution of debt of any options that create multiple unitaries.

5.44 Criterion C: Unitary structures must prioritise the delivery of high-quality and sustainable public services to citizens

Option 5 scored 4/5, as did Option 1 and Option 6.

Options 5 would allow disaggregation risks/costs to be minimised and create greater capacity and resilience for service delivery. Purchasing power and market influence would be significant. Having only two unitary areas may make it easier to coordinate with key partners such as the NHS, police, and voluntary sector. Each individual unitary may be more likely to have financial capacity to progress transformation and public service reform. However, large authorities would need to put in place sufficient arrangements to respond to local community needs and work effectively across partner boundaries.

5.45 Criterion D: Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views

Option 5 scored 2/5, in line with most of the other options.

Although this option could provide greater value for money, some residents may have concerns about large unitaries being more remote. The scale of two unitaries could limit how reflective of local identities they would be and how agile and effective they could be in meeting specific local needs. This option could also create a West vs East dynamic and perception that more affluent areas in the west of the county are balancing out more deprived areas in the north.

5.46 Criterion E: New unitary structures must support devolution arrangements

Option 5 scored 2/5, joint second lowest.

There is a population disparity between the two proposed unitaries and a risk that Government would consider them too big to meet the criteria.

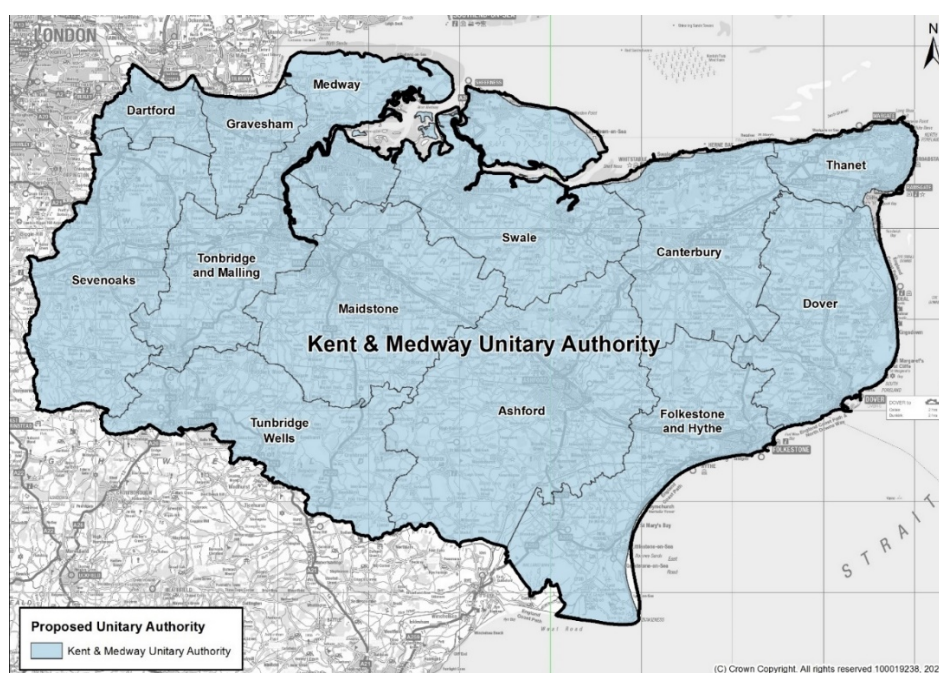
Governance between a Mayoral Strategic Authority and 2 unitary councils could be problematic in terms of decision-making, as there could be a dead-lock between the two councils on issues related to the whole county. Whilst this option may provide greater capacity and resources to manage border infrastructure and place-based work e.g. coastal regeneration, these functions would fall disproportionately in the east.

5.47 Criterion F: New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment

Option 5 scored 2/5. Option 6 was also scored at 2/5. Options 1 and 2 scored 3/5 and Options 3 and 4 scored the highest at 4/5.

The low score is due to the large size of the two proposed unitaries which could be perceived to operate more remotely from local communities. Despite potentially having greater capacity, it is likely that significant resource would be required to manage meaningful community engagement at a sufficiently local level across the county. Option 5's councillor numbers and electorate ratios exceed LGBCE recommendations.

5.48 Option 6 (Benchmark) – overall score 17/30



Unitary	Areas covered	Population (mid-2022)
Kent & Medway	Ashford, Canterbury, Dartford, Dover, Folkestone and Hythe, Swale, Gravesham, Maidstone, Medway, Sevenoaks, Swale, Thanet, Tonbridge and Malling, Tunbridge Wells	1,875,893

5.49 This option, resulting in a population of nearly 1.9 million – significantly above the 500,000 threshold - would likely not meet Government's criteria.

5.50 Overall, option 6:

- Is the most financially viable option, with greatest efficiencies and quickest payback period.
- Would avoid the costs and delivery risks of disaggregating countywide services but introduce other risks of complexity and remoteness.
- Creates a population that is much higher than the range that Government has indicated is acceptable.
- Would preclude devolution.

5.51 **Criterion A: A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government**

This option scored the highest with a score of 5/5.

A theoretical single unitary authority would create a sufficiently large and balanced tax base by pooling tax yield from all areas, ensuring fair distribution of council tax receipts across Kent and Medway and no undue advantage generated. With full access to the region's geography, it would also maximise capacity to manage housing demand strategically - overcoming spatial constraints, removing boundary-related barriers, and enabling more strategic planning.

5.52 **Criterion B: Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks**

This is the second highest scoring option (3/5).

The single unitary authority offers the strongest financial case, with the highest net recurring benefit, lowest transition costs and a payback period of under a year. It avoids disaggregation costs and enables year 1 savings of £16.2m in children's and adults' social care and SEND across the county. It supports strategic transformation through unified governance and economies of scale. Debt and reserves would be evenly distributed. However, its population of nearly 1.9 million exceeds the Government's preferred range (300,000–800,000), raising concerns about local responsiveness and agility and likely making it an unviable option for LGR.

5.53 **Criterion C: Unitary structures must prioritise the delivery of high-quality and sustainable public services to citizens**

This option scored 4/5, alongside options 1 and 5.

This is due to the high delivery capacity that the unitary would have, minimal disruption through disaggregation, and ability to deliver invest-to-save and preventative initiatives through high economies of scale and purchasing power. However, its centralised structure may introduce bureaucracy, slow innovation and complicate coordination with partners like VCSE organisations, NHS and police due to the region's complexity. It would however be the simplest way to ensure a single strong local government voice for Kent and Medway with partners and government on key issues.

5.54 **Criterion D: Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views**

This option scores 2/5, in line with most of the other options.

A single unitary option would likely be considered too large to reflect local identities or respond effectively to specific local needs. While the single unitary offers the highest efficiency and value for money, its scale may feel remote to residents, making it harder to engage communities or demonstrate how Council Tax is spent. Merging Medway into Kent might also be unlikely to gain political or local support.

5.55 **Criterion E: New unitary structures must support devolution arrangements**

This is the lowest scoring option with a score of 1/5.

This is due to its incompatibility with current Government policy on devolution. A single unitary cannot form an MSA alone and Kent and Medway has no eligible neighbouring authorities to partner with. Securing devolution would require significant lobbying against current policy, with little chance of success - severely limiting future opportunities for devolved powers and investment.

5.56 **Criterion F: New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment**

This option is one of the two lowest scoring options alongside Option 5, with a score of 2/5.

Like option 5, meaningful engagement across such a large area would require substantial investment in local mechanisms to ensure representation and responsiveness. The proposed councillor-to-electors ratio (13,625:1) also enormously exceeds LGBCE recommendations.

6. Cross-cutting issues

- 6.1 Developing the internal evidence base and conducting the internal options appraisal has identified several cross-cutting issues regarding LGR in Kent and Medway, whichever option is chosen. Some of the issues would apply to other large two-tier areas, but are exacerbated by features specific to Kent. The issues are set out in this section.

Significant disparity between different parts of the county

- 6.2 Kent is the largest county in the country and is uniquely positioned between London and the coast. This has shaped the significant diversity of places within the county, from urban centres in the North neighbouring London, more affluent commuter towns and rural areas in the West and coastal communities in the East.

- 6.3 This diversity drives one of the most significant and pervasive disparities seen within the county - the wide variation in levels of deprivation. Of the local areas (Local Super Output Areas) in Kent that are in the top 10% most deprived in the country according to the Index of Multiple Deprivation, 53% of them are found in Thanet and Swale. Conversely, there are very few of these most deprived neighbourhoods in West Kent (none in some Districts). Higher levels of deprivation results in greater demand for services, limits funds that councils are able to raise through Council Tax and can create other challenges in supporting local communities.
- 6.4 Splitting the county through the process of LGR risks embedding disparities between more and less deprived areas, which will be most pronounced in the difference between East and West Kent. The councils in Kent and Medway have a responsibility to ensure that any LGR proposal put forward works for the entire area and does not leave some parts of the county with unsustainable cost and demand pressures while other parts benefit.

Concentrations of need and spend in different parts of the county

- 6.5 Kent's diversity creates significant differences in demand for KCC services across different geographical areas. The county council's current scale provides capacity and flexibility for countywide services to balance demand and spend across the county. This provides financial resilience and supports the provision of high-quality service provision, as resources can be targeted to meet needs in different geographical areas. Due to their scale, key services such as children's and adults' social care have capacity in quality assurance and other countywide support functions that can be deployed to areas that need greatest attention.
- 6.6 By splitting countywide services up through LGR, these advantages of scale will be lost, and it is likely to be much harder for some of the new, smaller unitaries to manage demand pressures and maintain service standards.
- 6.7 KCC's internal modelling of the impacts of separating countywide services into multiple unitaries has highlighted the areas where spend on services is concentrated. In adult social care, spend is significantly higher in Folkestone & Hythe and Dover, due to the location of major providers of residential care for adults in those areas. In children's social care, spend is greatest in the areas of greatest deprivation, particularly Thanet and Swale. Spend on Home to School Transport is also highest in Swale. Modelling suggests that in the areas of higher spend, this would not be sufficiently offset by funding. This modelling will need to be repeated when the outcomes of the Fair Funding 2.0 review are known, but this may not completely mitigate the pressures.
- 6.8 Through LGR, the concentrated areas of spend will be placed into smaller unitaries that may not have sufficient scale to manage them. Some options amplify this effect by placing particularly high spend areas together in a small unitary, but this is likely to be an issue for East Kent in any arrangement.

Financial sustainability

- 6.9 The financial implications of concentrating high-spend areas in smaller unitaries could pose significant risks to their financial sustainability. It could be difficult for the new unitaries to meet their statutory obligations, and to find additional capacity for place-shaping and visible place-based services for the benefit of all residents.
- 6.10 There are also added costs of delivering services that are currently countywide in separate unitaries, such as the need for duplicated senior posts to lead key services. These ongoing disaggregation costs will add to financial pressures for new unitaries and could risk increasing cost to Kent taxpayers overall.
- 6.11 Modelling suggests there will be disparities in the amount of council tax and business rates that the proposed new unitaries could raise, with the West having greater revenue raising potential than the rest of the county. This could exacerbate the financial challenges caused by concentrations of spend on key services, particularly in the East.
- 6.12 Similarly, modelling on debt and reserves levels across the county suggests that a potential West Kent unitary will inherit significantly higher levels of reserves and lower levels of debt than the other areas, further strengthening the financial resilience of the West compared to the rest of the county. High levels of debt in Medway could create a legacy debt pressure for any new unitary that includes the Medway area, and there are higher debt levels in some of the Kent districts. Government expects local areas to manage debt locally as part of the LGR process, so the fair distribution of debt will be an important and challenging part of the joint discussions in Kent and Medway.

Kent's unique position as the major border to Europe

- 6.13 Kent's strategically important position as the gateway to Europe brings with it unique pressures. Although extremely challenging, KCC working with partners has been able to manage the increased demands on our children's services, transport network and other local services because the county has a critical mass of capacity and resources due to its significant scale.
- 6.14 In any model, the new unitary council that covers the East Kent area would inherit the pressures brought by the border and the statutory responsibilities to respond. It is unlikely that a smaller unitary would have the capacity to manage this alone, particularly given the other inherent pressures on East Kent identified previously.
- 6.15 In Kent and Medway's feedback letter to the Interim Plan submissions, MHCLG has acknowledged the unique considerations for LGR in the area due to Kent's border position. The letter asks for Kent and Medway councils to provide evidence on service delivery and financial impacts of splitting transport functions and any challenges to managing unaccompanied asylum-seeking children. MHCLG recommends that final proposal(s) provide further detail on how new unitaries in the Kent and Medway area could continue to work together to respond as necessary to ensure uninterrupted delivery of services. An added complication is that LGR might separate infrastructure that exists in the county to manage the movement of goods and people across the border

into multiple unitaries, creating multiple partners and points of contact to manage the issues and work with Government.

- 6.16 The ongoing management of border pressures will be another substantial issue to be addressed through LGR discussions. Reaching agreement between the new unitaries on a robust joint approach that will endure over the long-term is likely to be challenging.

No strategic cross-county vehicle

- 6.17 Kent and Medway is the only two-tier (and neighbouring unitary) area in the South East to have not been included in the Devolution Priority Programme (DPP). While this could be considered a lost opportunity to benefit from the potential benefits of devolution as quickly as possible, what is much more significant to the area is that in the absence of being on the DPP, there is no timetable in place for when a Strategic Authority for Kent and Medway might be introduced.
- 6.18 This means that at present LGR will happen in Kent and Medway with no concurrent development of a strategic cross-county vehicle, which a Strategic Authority would have provided. This is a critical consideration for LGR in Kent and Medway due to the significant pressures that have been identified in particular parts of the county, most markedly East Kent, that are unlikely to be managed by individual unitaries without a continued countywide approach. Government have acknowledged that a joint response between unitaries will still be expected to manage border issues.
- 6.19 With no readily available cross-county structure available, it may be necessary for Kent and Medway to consider the use of shared services arrangements. Government has raised the possibility of Children's Trusts and adult social care partnerships being introduced as part of LGR to retain management of services over a strategic area such as a county and mitigate the costs and impacts of splitting service provision into separate unitaries. However, shared services models in general have inherent weaknesses and a poor record of success in other areas of the country. Given the scale of the pressures and challenges the county faces, there is a risk that this would have a detrimental impact on key services in Kent and Medway.

7. Next steps

- 7.1 This report has aimed to set out what has happened so far on LGR in Kent and Medway, and present the internal research conducted by KCC to support Members to reach an informed position.
- 7.2 The joint work with Kent Council Leaders and the external partner will continue at pace. KCC is committed to fully taking part in the process of developing the shared evidence base and options appraisal, after which time all councils will need to decide which option they will support.

- 7.3 As this joint work continues, further reports will be brought to this committee and to Cabinet on the progress and findings to inform the development of KCC's policy position and next steps.
- 7.4 The internal research and analysis that KCC has conducted will also continue and be made available to partners in order to ensure that the shared evidence base includes robust information on the issues and implications of LGR for KCC. This will focus on continued detailed financial modelling, including to understand the implications of the Fair Funding 2.0 review. It will also continue to gather evidence on the service delivery impacts on KCC's major services including adults and children's social care, and potential ways that this could be managed.

8. Recommendations

8.1 The Cabinet Committee is asked to:

- (1) **Discuss** and consider the options appraisal, rationale and associated evidence base.
 - (2) **Note** the commitment from KCC to fully take part in the process to develop a shared options appraisal with partners.
 - (3) **Note** the commitment to bringing future papers to this Committee and Cabinet as the work progresses to inform the development of KCC's policy position and next steps.
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9. Relevant Director:

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

10. Report Authors:

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

11. Appendices:

Appendix 1 - Detailed scoring table for the options appraisal

Appendix 2 - Rationale for options appraisal scoring

Appendix 3 - Evidence base, comprising of:

1. Financial assessment report
2. Engagement assessment report
3. Democracy and local identity assessment report
4. Transformation assessment report

5. Devolution policy assessment report
6. Options Profiles
7. Housing growth analysis report

12. Background documents:

Previous paper to County Council – Devolution and Local Government Reorganisation update, 13 March 2025, available at <https://democracy.kent.gov.uk/ieListDocuments.aspx?CId=113&MId=9526&Ver=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 [English Devolution White Paper: Power and partnership: Foundations for growth - GOV.UK](https://www.gov.uk/government/white-papers/english-devolution-white-paper-power-and-partnerships-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>

Appendix 1: Detailed scoring table for options appraisal

Criteria	Options (see maps below)					
	Option 1 3-unitary	Option 2 4-unitary	Option 3 4-unitary	Option 4 4-unitary	Option 5 2-unitary	Option 6 1-unitary (Benchmark)
A. A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government	3	1	2	1	4	5
Sensible economic areas with an appropriate tax base, no undue advantage for one part of the area	4	1	2	2	4	5
Sensible geography which will help to increase housing supply and meet local needs	2	2	2	1	3	4
B. Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks	3	1	1	1	4	3
Population of 500,000 or more	5	2	2	2	2	1
Delivers efficiencies and best possible value for money for taxpayers	3	1	1	1	4	5
Transition costs are manageable	2	1	1	1	4	5
Opportunities for transformation from existing budgets and invest-to-save projects	4	2	2	2	5	3
Debt is manageable within the new structures	2	2	2	1	4	5
C. Unitary structures must prioritise the delivery of high-quality and sustainable public services to citizens	4	2	2	2	4	4
Will improve local government and service delivery and avoid unnecessary fragmentation of services	3	2	2	2	4	5
Provides opportunities to deliver public service reform, including where this will lead to better value for money	5	2	2	1	3	2

Criteria	Options (see maps below)					
	Option 1 3-unitary	Option 2 4-unitary	Option 3 4-unitary	Option 4 4-unitary	Option 5 2-unitary	Option 6 1-unitary (Benchmark)
Manages impacts for crucial services - social care, children's services, SEND and homelessness, and for wider public services including for public safety	3	2	2	2	4	5
D. Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views	4	2	2	2	2	2
Supported by partners and residents	4	2	2	2	3	2
Sensitive to issues of local identity and cultural and historic importance	4	2	3	3	2	2
E. New unitary structures must support devolution arrangements	5	2	2	2	2	1
Will help unlock devolution	5	2	2	2	2	1
Sensible population size ratios between local authorities and any strategic authority, with timelines that work for both priorities	5	2	2	2	2	1
F. New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment	3	3	4	4	2	2
Total score	22	11	13	12	18	17

Scoring

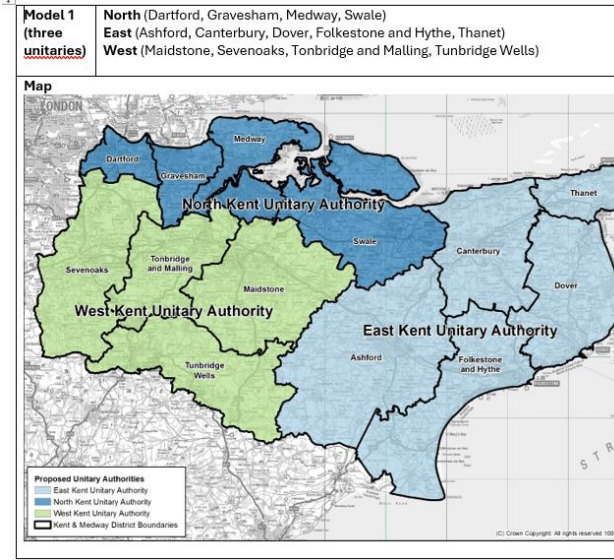
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|------------------------------------|---------------------------------|
| 5: Entirely meets the criteria | 2: Partially meets the criteria |
| 4: Strongly meets the criteria | 1: Does not meet the criteria |
| 3: Sufficiently meets the criteria | |

Notes on scoring:

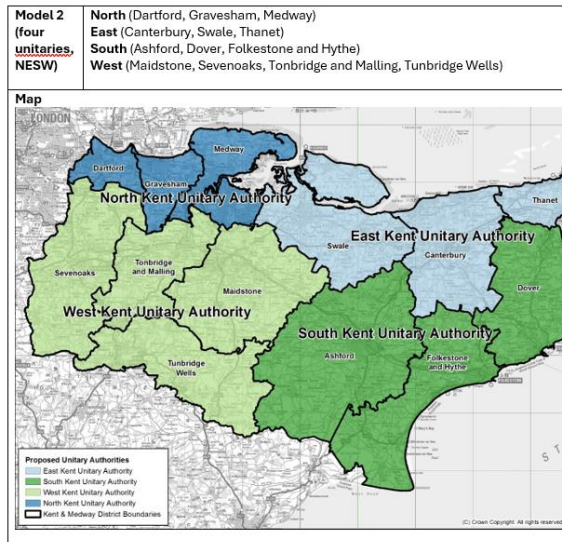
- The 6 criterion (A, B, C..) are taken directly from the Government criteria.
- The sub-criteria are interpreted from the Government criteria.
- Sub-criteria were scored only to inform the judgement on the overall score for each criterion.
- Due to the nature of the criteria, scoring is subjective.

Options included in the options appraisal:

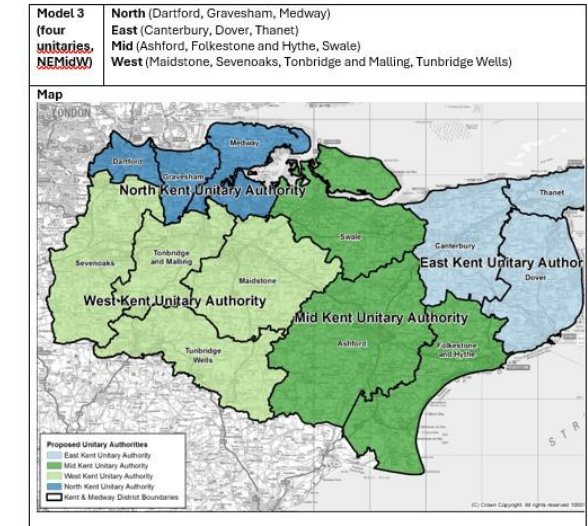
Option 1



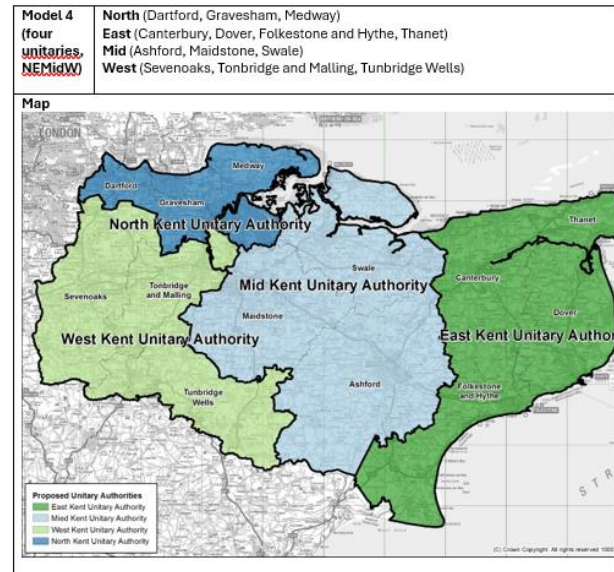
Option 2



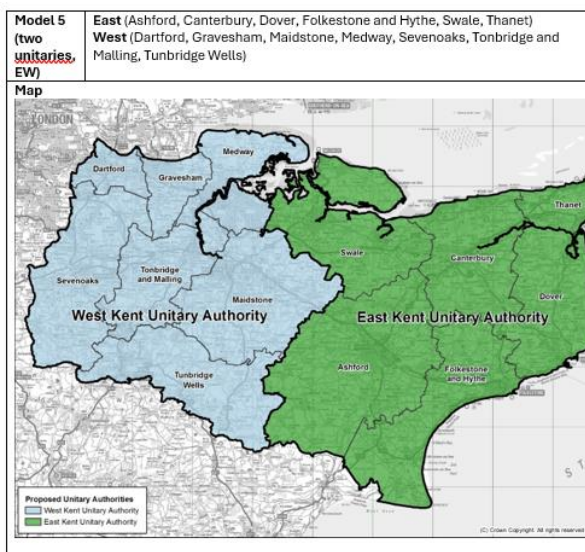
Option 3



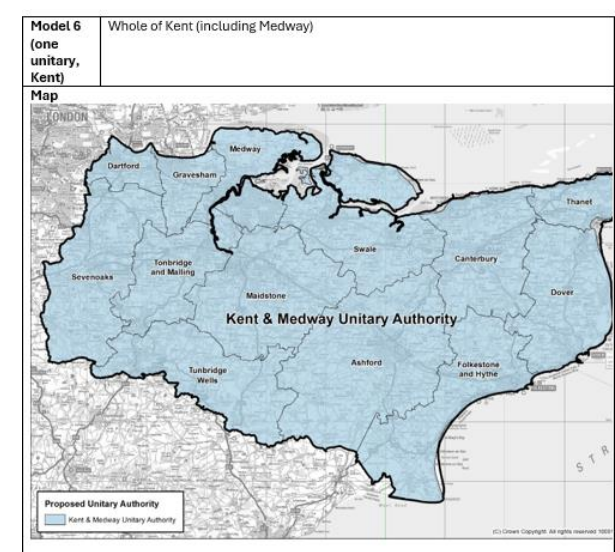
Option 4



Option 5



Option 6 (Benchmark)



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Appendix 2: Rationale for Options Appraisal scoring

Criterion A: A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government

Overall scores:

Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary – benchmark (K&M)
3	1	2	1	4	5

Summary for Criterion A

Inevitably, a theoretical single unitary would be the most effective way to ensure that the taxbase is appropriate for the area and there is no undue advantage for one part of the county over another. A single unitary would also maximise the available area over which to manage housing demand, helping to overcome spatial constraints and removing authority boundaries that can hamper housing delivery. These advantages also apply to the two-unitary option to a lesser extent, but this option would introduce small disparities in income between East and West. Councils in the four-unitary options are more likely to experience challenges in meeting housing need, and modelling suggests that there will be significant disparities between unitaries in the cost of social care and SEND, which is exacerbated in some options by the location of major adult's residential social care providers and concentrations of deprivation in proposed unitaries. Newton have indicated that the disparities in spend between unitaries in the four-unitary options are higher than they have seen in options being considered in other parts of the country, primarily because the proposed populations are small. Given Government's current direction of travel the delivery of housing supply and the associated increase in Council Tax receipts will be important to the financial viability of local authorities.

Two sub-criteria were considered to generate the overall score for Criterion A:

- 1) Sensible economic areas with an appropriate tax base, no undue advantage for one part of the area
- 2) Sensible geography which will help to increase housing supply and meet local need

Sub-criteria:

1) Sensible economic areas with an appropriate tax base, no undue advantage for one part of the area

Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary – benchmark (K&M)
4	1	2	2	4	5

Rationale

Overall assumptions and considerations:

- Government's Fair Funding Review 2.0 launched in late June 2025 proposes changes to local government funding formulas including how deprivation and Council Tax income will affect the distribution of funding. At the time that this options appraisal was carried out, the impacts of these changes were not yet known. Further financial modelling will be required once this information becomes available.
- For the purposes of this assessment, an appropriate tax base that does not create undue advantage has been defined as a total tax base that is relatively equitable between proposed authorities within a model.
- In-house financial modelling has been undertaken to capture the likely income from Council Tax for each new unitary authority - this is expressed as overall Council Tax yield and has been calculated at the average rate of harmonisation. Total Council Tax yield has predominately been used to inform the options appraisal, as a judgement was made that the total quantum of income available to the new unitaries would be of greater interest to Government than the amount per head, but the per head information is also included in the Financial Assessment. As the level at which Council Tax harmonisation is set will be a political decision for the new unitaries, the average rate has been used to inform scoring. Harmonising to the highest or lowest point would have different impacts.
- In addition, the impacts for people-based services through Newton's analysis provides evidence on the variation of increases in costs for adults' and children's social care and SEND between proposed unitaries in the different options.
- Analysis of disaggregation costs by KCC's Finance team shows that the 'legacy' costs of Adult Social Care (ASC) would be particularly high in Folkestone & Hythe and Dover because a high proportion of the county's residential placements are in these districts. This means that unitary authorities which contain these districts will inherit high ASC costs.
- The analysis by KCC's Finance team also shows that costs for Children's Social Care (CSC) correlate with areas of higher deprivation, with costs particularly high in Thanet, Swale, and Folkestone & Hythe. Unitary authorities which contain these districts will therefore inherit high CSC costs.

Option 1 (3 unitaries) – score 4/5

- Internal KCC analysis shows that, at the average rate of harmonisation, the overall tax yield for the East Kent unitary authority would be £427m, £391m in the North Kent unitary authority, and £414m in the West Kent unitary authority. The difference between the highest and lowest is £36m and the balance ratio is 1.09 which indicates a good balance.
- The increase in required spend per resident on social care and SEND in year 1 varies by 27.7% between the unitaries. This is less variance than the 4 Unitary Authorities (4UA) options but more variance than the 2 Unitary Authorities (2UA) and 1 Unitary Authority (1UA) options.
- KCC's analysis of legacy costs of ASC and CSC found that there would be disparities between the unitary authorities with the West Kent unitary authority inheriting lower costs per resident than the North Kent and East Kent unitary authorities. In East Kent the costs for ASC would be £402 per resident and £291 in West Kent. In this model the cost pressure for ASC is concentrated in the East Kent unitary, whereas in the 4-unitary options the

higher cost areas in the East are split with two unitaries inheriting high costs. The cost for CSC in East Kent would be £152 per resident, in North Kent it would be £153 and in West Kent it would be £79.

Option 2 (4 unitaries) – score 1/5

- Internal KCC analysis shows that, at the average rate of harmonisation, the overall tax yield varies from £241m in South Kent to £414m in West Kent – a difference of £173m. This is a balance ratio of 1.72 which is the highest of all the options.
- The increase in required spend per resident on social care and SEND in year 1 varies by 34.9% between the unitaries.
- KCC's analysis of legacy costs of ASC and CSC found that there would be disparities between the unitary authorities, with the West Kent unitary authority inheriting lower costs per resident than the other unitary authorities. In South Kent the costs for ASC would be £440 per resident - which is the highest of all the options - and in West Kent it would be £291. The cost for CSC in East Kent would be £171 compared to £79 in West Kent (the biggest difference in cost across all options). In this option, the South Kent unitary authority would inherit the highest costs per resident for people-based services out of all of the options.

Option 3 (4 unitaries) – score 2/5

- Internal KCC analysis shows that, at the average rate of harmonisation, the overall tax yield varies from £258m in Mid Kent to £414m in West Kent - a difference of £156m. This is a balance ratio of 1.6 which is relatively high.
- The increase in required spend per resident on social care and SEND in year 1 varies by 29% between the unitaries (the least variance of all the 4UA options).
- As above, there would be disparities in the legacy costs for ASC and CSC, with West Kent inheriting lower costs compared to the other unitary authorities. In East Kent the costs for ASC per resident would be £389, in Mid Kent it would be £366, North Kent would be £216, and West Kent would be £291. For CSC, the costs per resident in East Kent would be £153, in Mid Kent it would be £162, North Kent would be £134 and West Kent would be £79. Of the 4UA options, this option has the most even distribution of inherited costs (though there would still be significant pressures on East Kent and Mid Kent) largely because in this option, Dover and Folkestone & Hythe are in different unitary authorities.

Option 4 (4 unitaries) – score 2/5

- Internal KCC analysis shows that, at the average rate of harmonisation, the overall tax yield is relatively even across the four unitaries. with a discrepancy of approximately £54m between the highest (East Kent - £338m) and lowest (West Kent - £284m). This is a balance ratio of 1.19 which is the most even of the 4UA options (but not as even as the 3 Unitary Authorities (3UA) option). Inclusion of Maidstone in the Mid Kent Unitary contributes to the improved financial viability of this authority and helps mitigate the undue advantage that exists in the other four unitary options.
- However, the increase in required spend per resident on social care and SEND in year 1 varies by 38.5% between the unitaries. This is the biggest variance across all of the

options. As with option 2, this model puts Folkestone & Hythe and Dover in the same small unitary, creating significant Adult Social Care pressures.

- As above, there would be disparities in the legacy costs for ASC and CSC, with West Kent inheriting lower costs compared to the other unitary authorities. In East Kent the costs for ASC per resident would be £438, in Mid Kent it would be £271, North Kent would be £216, and West Kent would be £302. For CSC, the costs per resident in East Kent would be £160, in Mid Kent it would be £126, North Kent would be £134 and West Kent would be £76. The distribution of inherited ASC and CSC legacy costs are unevenly distributed in this model, although they are marginally more balanced when compared to option 2 (4UA model). This, coupled with the fact this model results in the most equitable distribution of council tax yield between unitaries out of all the 4UA models, results in this option scoring 2/5.

Option 5 (2 unitaries) – score 4/5

- Internal KCC analysis shows that, at the average rate of harmonisation, the overall tax yield between the two authorities is approximately £195m, with West Kent raising £713m and East Kent £518m. This is a balance ratio of 1.38.
- The increase in required spend per resident on social care and SEND in year 1 varies by 21.2% between the unitaries which is the lowest variance.
- There would be disparities in the legacy costs for ASC and CSC, with West Kent inheriting lower costs compared to East Kent. However, the disparity would be lower than in other options due to the larger unitary authorities being able to spread the costs across their areas. The cost per resident for ASC would be £379 in East Kent and £269 in West Kent. And the cost for CSC in East Kent would be £158 compared to £95 in West Kent. This model results in the most equitable distribution of inherited ASC and CSC legacy costs between the unitaries across all options.

Option 6 (1 unitary - benchmark) – score 5/5

- Creation of a single unitary authority theoretically ensures an appropriate tax base which is sufficiently large by collating tax yield from all areas.
- No undue advantage is generated due to creation of one single authority with total council tax receipts equally divided across the entire Kent and Medway population.
- The costs for ASC and CSC would be spread across the entire county area which would help absorb some of the pressures from the areas where spend is concentrated (i.e. Folkestone & Hythe, Dover, Thanet, and Swale).

2) Sensible geography which will help to increase housing supply and meet local needs

Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary – benchmark (K&M)
2	2	2	1	3	4

Rationale

Overall assumptions and considerations:

- To consider the impact of LGR on the capability of new unitaries to meet local housing supply needs, two metrics have been developed: 1) the percentage of the new annual housing target that has been delivered (on average) in districts in the last six years, and 2) the percentage of the four year housing target that has been identified for development and included in the Housing Information Audit (the trajectory of expected housing completions in districts).
- Whilst this evidence helps indicate which unitary authorities might experience the greatest challenges in meeting housing supply need, the overall usefulness of this data is limited as it does not indicate which factors are contributing to the challenges. This could range from political choice, availability of land and planning constraints, or local community response to development proposals. Any number of these factors could be impacted by reorganisation. To reflect this, scores for this sub-criterion are moderate for all options as there is insufficient evidence to conclude that the sub-criterion is either not met or strongly met.
- Also this does not take into account any information on existing housing stock, and does not consider homelessness and temporary accommodation need, which are not specifically included by Government in this criterion.
- Where smaller authorities are established, there is likely to be less flexibility for strategic planning of housing due to the limitations presented by area boundaries.
- It should be noted that the challenge for West Kent to deliver the four-year housing target is common across all options (excluding option 6), owing to its significant greenbelt geography.

Option 1 (3 unitaries) – score 2/5

- Considering the percentage of the four-year housing target that has been identified for development, West Kent is likely to experience the greatest challenges in delivering this and is currently projected to meet only 67% of this target.
- Division into three unitaries is likely to have only minimal benefits in terms of mitigating existing challenges around limitations of authority boundaries for planning.

Option 2 (4 unitaries) – score 2/5

- Whilst this option creates an East Kent Unitary that has met only 56% new housing targets in the last six years, projected delivery data suggests that this authority would be on track

to deliver 108% of the four-year target. The position of the West Kent Unitary within this option is more problematic, as it is only projected to achieve 67%. Despite this, this option is likely to be the best performing across the options that establish four unitaries.

- Division into four unitaries is likely to generate more challenges (or at least will not mitigate existing challenges) around limitations of authority boundaries for planning.

Option 3 (4 unitaries) – score 2/5

- Whilst this option creates an East Kent Unitary that has met only 52% new housing targets in the last six years, projected delivery data suggests that this authority is on track to deliver 111% of the four-year target. The position of the West Kent Unitary within this option is more problematic, as it is only projected to achieve 67%.
- As above, division into four unitaries may not mitigate limitations of authority boundaries for planning.

Option 4 (4 unitaries) – score 1/5

- In terms of past delivery and projected future delivery, this option sees the poorest potential outcomes, with a West Kent authority which delivered only 45% of the new annual housing target in the last six years, and which is projected to deliver only 64% of the four-year target. This arises from the configuration of this authority which removes Maidstone and combines the three West Kent districts that historically have the lowest delivery levels.
- As above, division into four unitaries may not mitigate local resistance and limitations of authority boundaries for planning.

Option 5 (2 unitaries) – score 3/5

- Creation of two unitary authorities largely evens out the difference in past housing delivery. Whilst this option sees the West Kent authority in its strongest position (projected to deliver 76% housing target), this is still unbalanced compared to East Kent (projected to deliver 106%).
- Division into a smaller number of unitaries is also likely to help councils meet increasing housing supply need, with fewer authority boundaries complicating planning.

Option 6 (1 unitary - benchmark) – score 4/5

- By grouping together all districts across Kent and Medway, housing delivery challenges in some areas are evened out/mitigated by opportunity in other areas.
- Furthermore, the creation of a single unitary is likely to significantly improve the ability/capacity to meet increasing housing supply need. With access to the entire geography of Kent and Medway, the authority would have greater flexibility and capacity to be strategic with the location of new housing that is more sensible and less restricted by district boundaries.

Criterion B: Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks

Overall scores:

Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary - benchmark (K&M)
3	1	1	1	4	3

Summary for Criterion B

While the three-unitary option provides the best match for Government's expectations on population size, the two- and single-unitary options would provide greater efficiencies and value for money, lower transition costs that could be more quickly repaid and easier management of debt. The stronger financial position would provide more capacity to maximise transformation opportunities and invest-to-save projects. The two-unitary option scores highest on this sub-criterion as it would balance capacity with responsiveness to localised needs between the East and West to target transformation activity. Conversely, the four-unitary options score poorly on value for money and transition costs as they have no pay-back period (i.e. they would never return to a breakeven point). They could lack capacity and resilience to deliver meaningful transformation. The single unitary option provides significant financial advantages but fundamentally does not meet Government expectations around population size, which reduces its overall score.

Five sub-criteria were considered to generate the overall score for Criterion B:

- 1) Population of 500,000 or more
- 2) Delivers efficiencies and best possible value for money for taxpayers
- 3) Transition costs are manageable
- 4) Opportunities for transformation from existing budgets and invest-to-save projects
- 5) Debt is manageable within the new structures

Sub-criteria:

1) Population of 500,000 or more

Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary – benchmark (K&M)
5	2	2	2	2	1

Rationale

Overall assumptions and considerations:

- Whilst this criterion requires a minimum population size of 500k per unitary authority, this appraisal considers whether populations fall within the broader range that government has indicated is likely to be acceptable (300,000 to 800,000) in order to acknowledge the wide range of population sizes in the options being considered.

Option 1 (3 unitaries) – score 5/5

- All three unitary authorities within this model meet the minimum population requirement of 500k. It is the only option where all unitaries would have populations close to 500,000.

Option 2 (4 unitaries) – score 2/5

- All four unitary authorities fall within the 300k-800k population range. Two are in excess of 500k (North Kent and West Kent) and the other two are below, with one (South Kent) significantly below at 363,320. According to population growth estimates, it is possible that one or both of the smallest two unitary authorities will still have a population below 500,000 in 2035.

Option 3 (4 unitaries) – score 2/5

- All four unitary authorities fall within the 300k-800k population range. Two are in excess of 500,000 (North Kent and West Kent) and the other two are under (East Kent at 415,712 and Mid Kent at 400,466). According to population growth estimates, the smallest two unitary authorities will still have a population below 500,000 in 2035.

Option 4 (4 unitaries) – score 2/5

- All four unitary authorities fall within the 300k-800k population range. Two are in excess of 500k (North Kent and East Kent) and one is significantly below at 370,795. According to population growth estimates, the smallest unitary authority (West Kent) will still have a population below this level in 2035.

Option 5 (2 unitaries) – score 2/5

- Whilst division of Kent and Medway into two unitary authorities meets the requirements for this criterion, both East Kent (816,178) and West Kent (1,059,715) would see populations in excess of the 800k mark, which could pose practical challenges for the delivery of local government. Some other areas are proposing unitaries with populations of over 900,000 as Government has not set a definite upper limit, so it is yet to be seen if populations of this size might be considered acceptable.

Option 6 (1 unitary - benchmark) – score 1/5

- Whilst creation of a single Kent & Medway unitary authority delivers a population in excess of the 500k target, this significantly exceeds the broader range of 300k-800k with a total of 1.9million and therefore poses significant practical challenges for the delivery of local government and importantly the viability of this option for LGR.

2) Delivers efficiencies and best possible value for money for taxpayers

Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary – benchmark (K&M)
3	1	1	1	4	5

Rationale

Overall assumptions and considerations:

- The main indicators of efficiency and value for money for residents that have been used are net recurring benefit and estimated payback period.
- The ongoing costs of splitting council services across multiple unitaries has significant impact on both of these indicators so information on these costs have been considered for this criterion. Both PwC and Newton estimated ongoing costs. PwC's estimate is for all upper tier services and looks at the costs arising from diseconomies of scale and duplication, for example of senior posts, but does not model the specific costs associated with levels of demand on individual unitaries. Newton's modelling covers adults' and children's social care and services for children with special educational needs and disabilities (SEND) and uses Kent and Medway data to estimate total disaggregation costs. More attention has been given to the Newton estimates here as it used a more specific methodology and the services it covers which will make-up the majority of costs from splitting upper tier services.
- Debt and transition costs will also impact the delivery of efficiencies and value for money, but these are scored separately below.
- For the four-unitary options, PwC financial estimates have been generated overall – not modelled for each different geographical configuration.

Option 1 (3 unitaries) – score 3/5

- Moderate net recurring benefit of £9.3m (before transition costs).
- Does pay back but takes 8.2 years.
- Disaggregation costs are moderate compared to the four unitary options – there would be an estimated increase in annual spend on children's and adults' social care and SEND across Kent and Medway of £14.9m (not taking into account any demand pressures that would also be added over time).

Options 2, 3 and 4 (4 unitaries) – score 1/5

- Net recurring benefit is negative (loss) of £5.4m (before transition costs).
- There is no predicted payback period as recurring costs continue to exceed benefits. New unitaries could struggle to be financially viable and might need to make significant increases in Council Tax and / or reductions in service delivery.

- Disaggregation costs are inevitably higher with more unitaries – there would be an estimated increase in annual spend on children’s and adults’ social care and SEND across Kent and Medway of £19.1m (option 4), £20.8m (option 3) and £22.7m (option 2).

Option 5 (2 unitaries) – score 4/5

- Higher net recurring benefit of £16.5m (before transition costs).
- Relatively short payback period of 3.8 years.
- Estimated disaggregation costs are significantly smaller with two unitaries - there would be an estimated increase in annual spend on children’s and adults’ social care and SEND across Kent and Medway of £4.9m.

Option 6 (1 unitary - benchmark) – score 5/5

- High net recurring benefit of £49.4m (before transition costs).
- Very short payback period of less than one year.
- There are no disaggregation costs with a single unitary – there would be an estimated saving in spend on children’s and adults’ social care and SEND across Kent and Medway of £16.2m per year.

3) Transition costs are manageable

Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary – benchmark (K&M)
2	1	1	1	4	5

Rationale

Overall assumptions and considerations:

- Assessment of transition costs has been considered in relative rather than absolute terms to appropriately demonstrate the difference in outcomes between different options.
- Aside from the overall affordability of transition costs, further consideration needs to be given to how these costs will be distributed amongst Kent and Medway’s councils. Some of Kent’s district councils have little in reserves to meet transition costs. It will therefore be important to consider in more detail how to ensure equity of cost distribution. Other areas have experienced inequity in proportions of transition funding being provided by upper- and lower-tier authorities, which is not proportionately reflected in transition decision-making.

Option 1 (3 unitaries) – score 2/5

- Transition costs are high at £42.6m over three years. Payback is over 8 years.

Options 2, 3 and 4 (4 unitaries) – all scored 1/5

- Transition costs are highest at £54.7m.

- Transition costs are not manageable as financial modelling has demonstrated that there is no payback period for options that create four unitary authorities.

Option 5 (2 unitaries) – score 4/5

- Transition costs are more manageable at £25.8m.
- This option would achieve net benefit within a manageable period of 3.8 years.

Option 6 (1 unitary - benchmark) – score 5/5

- This option generates the lowest transition costs (one-off cost of £23.2m).
- This option would achieve net benefit in less than a year.

4) Opportunities for transformation from existing budgets and invest-to-save projects

Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary – benchmark (K&M)
4	2	2	2	5	3

Rationale

Overall assumptions and considerations:

- In assessing each unitary option, the scoring was guided by the assumption that transformation is most viable where there is both sufficient financial capacity to fund upfront investment and the structural coherence to deliver long-term savings and service improvements.
- At this point it is not possible to predict what specific invest-to-save projects or budget savings might be delivered and the value of these.
- A key consideration across all options was the ability to absorb transition costs while still enabling invest-to-save initiatives—such as digital transformation, integrated commissioning, and service redesign. Larger unitary options (e.g. 1UA and 2UA) were assumed to have greater economies of scale and strategic capacity, which support transformation, but also carry risks of reduced local responsiveness and agility. Conversely, smaller options (e.g. 3UA and 4UA) were seen as more agile and locally attuned but less financially resilient and more fragmented, limiting their ability to deliver consistent, scalable transformation.
- The strength of evidence varied: while financial modelling and service demand projections provided a robust basis for comparing scale and capacity, assumptions around local responsiveness and partnership effectiveness were more qualitative, relying on stakeholder insights and professional judgement. Ultimately, the scoring reflects a balance between financial viability, operational scale, and the ability to deliver transformation that is both strategic and locally responsive.

Option 1 (3 unitaries) – score 4/5

- The 3UA option offers a strong platform for transformation by balancing scale with local responsiveness. It provides sufficient financial capacity and operational scale to support meaningful invest-to-save initiatives, such as integrated care models and digital transformation. While not as financially robust as the 2UA option, it still enables strategic investment in service redesign and innovation. Its alignment with existing sub-regional geographies also facilitates efficient partnership working, which is critical for delivering transformation within constrained budgets.

Options 2, 3 and 4 (4 unitaries) – score 2/5

- The 4UA option significantly limits opportunities for transformation from existing budgets. The smaller scale of each authority reduces financial resilience and the ability to absorb upfront costs associated with invest-to-save projects. High disaggregation and transition costs further constrain available resources, and the fragmentation of services increases the risk of duplication and inefficiencies. The option also introduces disparities in service demand and financial capacity, making it harder to deliver consistent transformation across the county.
- Options 2 and 4 that group Dover and Folkestone & Hythe are the areas with the highest adult social care spend, potentially compounding budget pressures and limiting the scope for transformation or invest-to-save initiatives due to reduced financial flexibility.
- Option 3 creates a 'Mid Kent' authority that would be less aligned with existing service delivery boundaries and partnerships (e.g. NHS, police, VCSE), and could therefore face higher coordination costs and fragmented planning, which reduces its ability to pool budgets or jointly invest in transformation. This misalignment could make it harder to deliver efficient, joined-up services and limit access to shared funding or strategic invest-to-save projects, ultimately weakening the financial case for transformation and reducing the return on investment.
- However, smaller, more local unitaries may have greater agility to respond to transformation opportunities tailored to local need and context within their areas.

Option 5 (2 unitaries) – score 5/5

- The 2UA option is conducive to transformation from existing budgets and invest-to-save projects. It combines the strategic scale needed to deliver large, high-impact transformation initiatives with local responsiveness to tailor services effectively.
- This option supports balanced service demand and financial capacity across both authorities, enabling more equitable and sustainable investment in transformation. It also reduces duplication and enables streamlined governance, which enhances the efficiency of transformation efforts. With stronger reserves, pooled budgets, and better alignment with existing partnerships, the 2UA option could facilitate a positive environment for delivering long-term value through transformation.

Option 6 (1 unitary - benchmark) – score 3/5

- The 1UA option offers the greatest theoretical potential for transformation due to its economies of scale, unified governance, and strong financial base. It can support large-scale invest-to-save projects and has the capacity to implement strategic, county-wide transformation initiatives. However, its size also introduces risks: reduced local responsiveness, potential bureaucratic inertia, and a potential tendency to default to large contracts that may limit flexibility and innovation. While this option can deliver transformation, its effectiveness depends heavily on how well it maintains local insight and agility. These trade-offs justify a mid-range score.

5) Debt is manageable within the new structures

Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary – benchmark (K&M)
2	2	2	1	4	5

Rationale

Overall assumptions and considerations:

- KCC currently has £2.61 of debt for every £1 held in reserves. In all scenarios the position will worsen for at least one of the unitaries compared to this starting point. In order to compare the options, the total Reserves to Debt for each unitary and the level of disparity between them has been calculated.
- Districts in West Kent have significantly lower levels of debt compared to the rest of the county which creates a skew in debt to reserves in most options. Conversely Medway has very high levels of debt. Addressing this issue through LGR negotiations to agree a fair distribution of the debt burden will be essential to support the financial viability of the new unitaries. This has not been factored into scoring.

Option 1 (3 unitaries) – score 2/5

- This option scores poorly as it concentrates financial risk in North and East Kent. Debt is distributed unevenly across the county, with North Kent having £5.05 of debt and East Kent having £4.50 for every £1 held in reserves. In comparison West Kent would have £0.52 of debt per £1 in reserves.

Option 2 (4 unitaries) – score 2/5

- This option also results in an inequitable distribution of debt. West Kent maintains low levels of debt compared to reserves (with £0.52 of debt for every £1 held in reserves), followed by £2.99 in East Kent, £4.79 in South Kent and £5.78 in North Kent.
- Compared to the 3 unitary option, levels of debt fall in East Kent as the number of districts reduces from 5 to 3, with financial risk transferred to North and South Kent.

Option 3 (4 unitaries) – score 2/5

- Similar to the above, West Kent maintains low levels of debt compared to reserves (£0.52 debt per £1 in reserves), whilst North Kent has the highest level of debt to reserves (£5.78). Mid Kent has the second highest level of debt to reserves at £5.00 whilst East Kent has £3.35 of debt per £1 in reserves.

Option 4 (4 unitaries) – score 1/5

- This is the least equitable option, with West Kent having even lower levels of debt compared to reserves - £0.19 of debt per £1 in reserves - than the other unitaries (£3.30 in Mid Kent, £3.71 in East Kent and £5.78 in North Kent). This is because Maidstone joins Mid Kent, leaving just Sevenoaks, Tonbridge & Malling and Tunbridge Wells in West Kent, who all have comparatively lower levels of debt.
- This option results in the widest disparity between West and North Kent.

Option 5 (2 unitaries) – score 4/5

- This option results in the most balanced distribution of debt. East Kent would have £4.04 of debt per £1 in reserves and West Kent would have £3.24. Northern areas' relatively high levels of debt and low reserves are offset by the higher reserves and lower debt seen in other West Kent districts (Sevenoaks, Tunbridge Wells and Tonbridge and Malling).

Option 6 (1 unitary - benchmark) – score 5/5

- All current debt and reserves are evened out across the single unitary authority, which inherently produces no disparity and creates the most manageable situation with regard to debt.

Criterion C: Unitary structures must prioritise the delivery of high-quality and sustainable public services to citizens

Overall scores:

Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary – benchmark (K&M)
4	2	2	2	4	4

Summary for Criterion C

The major issues that have shaped scoring on this criterion are the costs and risks of the disaggregation of county-wide services (which increase with more unitaries) and striking a balance between capacity and local responsiveness to deliver high-quality services. The alignment of new unitary boundaries with the existing delivery arrangements of partners (Health and Police) is also an important consideration in how well the options will unlock potential for public service reform. For these reasons, option 1 (3UA) has scored well because of its alignment of unitary boundaries with partner boundaries and because it could provide a good mid-point between capacity and scale to manage disaggregation and need within unitary

areas. Options 5 and 6 have scored highly because they provide unitaries with the greatest capacity and minimise (or remove) risks and costs around disaggregation. However, they lose some of the advantages of alignment with partners, and localised opportunities for reform might be slowed by large centralised decision-making structures. While the four-unitary options could be more locally responsive, they introduce more boundaries between service delivery and could lack the capacity to manage disaggregation costs and invest in public service reform, potentially putting crucial services at higher risk.

Three sub-criteria were considered to generate the overall score for Criterion C:

- 1) Will improve local government and service delivery and avoid unnecessary fragmentation of services
- 2) Provides opportunities to deliver public service reform, including where this will lead to better value for money
- 3) Manages impacts for crucial services - social care, children's services, SEND and homelessness, and for wider public services including for public safety.

Sub-criteria:

1) Will improve local government and service delivery and avoid unnecessary fragmentation of services

Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary – benchmark (K&M)
3	2	2	2	4	5

Rationale

Overall assumptions and considerations:

Improving local government and service delivery could encompass a wide range of issues. The Transformation assessment has identified four key problems with local government and service delivery under the current two-tier arrangements that are both significant challenges and which have the potential to be improved through LGR. We have therefore scored each option on the extent to which it is able to address each of the four problems, and then subsequently scored on the level of unnecessary fragmentation each model introduces, in order to arrive at an overall score for this sub-criterion.

Assumptions which underpin this analysis include:

- Larger authorities have greater strategic capacity and are able to take advantage of economies of scale.
- Larger authorities are also more resilient to demand fluctuations and financial pressures.
- Smaller authorities are more embedded in communities and may therefore be more responsive to local need.
- Increased fragmentation will result in greater ongoing disaggregation costs.

Problem areas	Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary – benchmark (K&M)
Sustainable market shaping	4	2	2	2	5	3
Prevention	3	2	2	2	3	4
Spatial planning	3	2	2	2	4	5
Visible place-based services	4	2	2	2	3	3

Unnecessary fragmentation	3	2	2	2	4	5
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Sustainable market shaping

This problem statement explores how LGR can act as a catalyst for more effective market shaping. By transitioning to unitary authorities, councils can streamline governance, reduce duplication, and commission people-based services at a more local level. With smaller unitaries, economies of scale may be lost but there is potentially an opportunity to gain more detailed local knowledge to commission in a more agile way.

Key considerations which informed this conclusion relate to efficiency benefits such as economies of scale, stronger commissioning power, and greater capacity for strategic investment, while maintaining a level of local responsiveness that is critical for tailoring services to diverse community needs. The 2-unitary option scored highest as it provides the best compromise between these factors, followed by the 3-unitary option which provides the second-best compromise. The single-unitary option provides increased capacity and economies of scale but this is traded-off with a loss of local responsiveness and therefore scored 3. The four-unitary options have the advantage of local agility but this is significantly outweighed by their reduced economies of scale and purchasing power.

Prevention

Demand for Adults' and Children's social care continues to rise both at a national level and within Kent and Medway. Rising demand is coupled with the rising cost of assessing need and delivering interventions. It is recognised that these interventions are frequently provided when a situation reaches crisis point, i.e. services are reactive and often unsustainable and not well co-ordinated with partners (such as health, police and education) and the Voluntary, Charity and Social Enterprise (VCSE) sector. This reactive approach not only strains limited resources but also fails to provide timely support to those in need, leading to a cycle of escalating issues and increased pressure on services. By focusing on prevention, services can address issues before they escalate, leading to better outcomes for individuals and more efficient use of resources, including opportunities to share information and data to identify and prioritise

those most likely to develop ongoing need for health and social care support before they reach crisis point.

Local Government Reorganisation (LGR) presents a unique opportunity to address these challenges through unitarisation. By bringing together services such as housing, leisure, education and social care under a single unified structure, LGR simplifies integration with other partners and creates new opportunities for prevention. Reorganisation allows for a more proactive approach, enabling early intervention and better coordination of services. As a result, it can help to reduce the demand on crisis services, improve outcomes for individuals and families, and create a more sustainable and efficient system overall. Prevention requires dual-running of new preventative models that will take time to embed with traditional services and invest-to-save proposals, both only possible with sufficient capacity.

Although smaller unitary authorities may have a better understanding of local need, they may not have the necessary financial resource to invest in preventative services. Moving to a 3 or 4 unitary model would also present a risk from fragmentation of services. These points resulted in the 1 unitary model being scored highest, as theoretically this is the largest area and therefore should have the greatest capacity to deliver invest-to-save projects, whilst also having the least risk of service fragmentation.

Spatial planning

The existing two-tier system can lead to fragmented planning, inefficiencies, and missed opportunities for coordinated growth. Planning is localised, making it harder to effectively address county-wide needs, and infrastructure development is fragmented.

LGR presents significant transformation opportunities to address these challenges. Unitary authorities are able to plan at scale more effectively by integrating key services such as housing, transport, and infrastructure planning. They are also better placed to use developer contributions to support local services and meet housing needs and targets more effectively. There is evidence that larger authorities are best positioned to manage these responsibilities and deliver these functions. As a result, the 1 unitary option scored the highest as it offers the strongest strategic alignment between planning, infrastructure, and growth, followed by the 2 unitary option which presents the best alternative by offering a balance between retaining many of the benefits of scale and maintaining strategic oversight of planning functions, whilst allowing for more flexibility and regional tailoring than possible in a 1 unitary option. In comparison, the three-unitary (3UA) and four-unitary (4UA) options offer more localised control, but carry greater risks of fragmented planning, inconsistent delivery, and reduced strategic coordination.

Visible place-based services

Over half of KCC's budget (circa 60%) is spent on Adult and Children's support services. This means that a considerable amount of council resource is being used to support a very small cohort of people (approximately 3% of the Kent population are in receipt of adults or children's social care). This imbalance, caused by growing demand in people services and continued under-investment in visible place services (by comparison only 6% of the KCC budget is put towards waste services and highway maintenance), contributes to residents' negative perception of quality of life and value for money from their local councils. Essentially, residents can feel as though they are paying more for less.

The challenge for any local authority, therefore, is the extent to which they are able to balance the delivery of statutory services for people who draw on care and support, with the need to invest in universal provision for all residents. The 3 unitary option is considered to offer the best balance here, creating authorities that are large enough to be able to deliver sustainable social care services across manageable geographical footprints, whilst also small and agile enough to be able to respond to local need and deliver effective place-based/visible services so people can more easily see where their Council Tax is being spent.

Unnecessary fragmentation

Any arrangement that creates more than one unitary council will lead to the fragmentation of county-wide services, which financial modelling shows will add substantial cost. There may also be service delivery and quality risks. This is a sliding scale; with greater costs and increased risk as more unitary councils are created. The 1 unitary option therefore scored highest, and the four unitary options scored lowest.

2) Provides opportunities to deliver public service reform, including where this will lead to better value for money

Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary – benchmark (K&M)
5	2	2	1	3	2

Rationale

Overall assumptions and considerations:

- Aligning council services with other public sector bodies presents opportunities for public service reform. Public Service Reform (PSR) is rooted in the principle that working with key partners such as the NHS and the Police, councils can help improve outcomes for residents, reduce duplication across public services, deliver better value for money, and respond more effectively to the complex needs of communities.
- Partnership working is most effective where public service boundaries are coterminous.
- At present, the best way to achieve public service reform is through service integration at an operational level – e.g. councils working more closely with Health and Care Partnerships and Police Command Units. Therefore, alignment to operational delivery has been viewed as more beneficial than retaining alignment with the strategic county-wide structures of other partners.
- Further opportunities for public service reform could be unlocked through devolution.

Option 1 (3 unitaries) – score 5/5

- Under this option, unitary boundaries are coterminous with other public sector bodies, allowing areas to aggregate frontline services. Examples include Kent Police Command Units and hospital trusts and Health and Care Partnerships. The ICB have indicated the three-unitary option is their preferred option. This would allow partners to build on established relationships and ways of working to accelerate tailored, community-based

integration and reform including on crime and community safety and health and social care.

- Aligning with current service delivery boundaries will minimise disruption for wider public services during the transition and provide the most efficient way for partners to work together in the longer-term.
- Greater opportunity to pool budgets with partners across large geographical areas to maximise use of shared resource and deliver better value for money, while balancing local responsiveness.

Option 2 (4 unitaries) – score 2/5

- This option aligns fairly well with Health and Care Partnership boundaries, with the South Kent and East Kent Authorities matching up with East Kent HCP, whilst the geography of the West Kent Authority mirrors the West Kent HCP footprint.
- That being said, the creation of four unitary authorities introduces additional parties into an already complex system across Kent and Medway, potentially making it harder to coordinate services across different public sector bodies.
- The advantage of smaller authorities (applicable to all of the 4 unitary options) is that they are best placed to work with partners at a hyper local level (e.g. through the development of neighbourhood health and care models, or through working with community healthcare providers and Primary Care Networks). Smaller authorities should also be able to work more closely with the local voluntary and community sector, ensuring best use of shared resource.
- However, ultimately it is likely that the four-unitary options will lack the financial resilience and strategic capacity to progress public service reform opportunities.

Option 3 (4 unitaries) – score 2/5

- One of the least favourable options as it creates a ‘Mid-Kent’ authority. There are no public service partnerships that exist across Mid-Kent, which limits opportunities for public service reform in this area. As a result, new partnerships and structures would most likely have to be created (e.g. shared service models, joint delivery arrangements, inter-authority partnerships etc) which could prove both costly and resource intensive.

Option 4 (4 unitaries) – score 1/5

- This option scores lowest as it must contend with the same challenges discussed above, but the fragmentation is more pronounced. For example, under this configuration the Mid-Kent Authority would have to work with three different Health and Care Partnerships (East Kent HCP for Ashford, West Kent HCP for Maidstone and Medway and Swale HCP for Swale), whilst also working with three separate Police Command Units. This fragmentation would make it harder to align council services with key partners and would limit opportunities for public service reform.

Option 5 (2 unitaries) – score 3/5

- Having fewer authorities should make it easier to coordinate with key partners such as the NHS, police, and voluntary sector. Larger areas create opportunities to pool substantial budgets and individual unitaries would likely have financial capacity to progress PSR. However, large authorities would need to put in place arrangements to respond to local needs and work across partner boundaries.
- Existing police units align to some extent into this model of unitarisation, with North and West Kent Police Command Units falling under the West Kent Authority, and the East Kent Police Command Unit falling under the East Kent Authority. Swale would be a constituent region of East Kent but its local police force would be aligned to North Kent.
- There is a similar picture with Health and Care Partnership boundaries.

Option 6 (1 unitary - benchmark) – score 2/5

- Significant resource requirement, as a single unitary would have to work with multiple partners (e.g. x4 Health and Care Partnerships, x3 Police Command Units). May make strategic coordination with partners simpler, but operational ('on the ground') service delivery more complex.
- Having one overarching governance structure may cause unnecessary bureaucracy. There might be no meaningful decision-making at a local level, with all decisions having to be passed upwards. There would be less scope for smaller areas to seize localised opportunities to innovate and pilot new initiatives without central approval. This could slow-down opportunities for budget pooling with partners as this would have to be centrally approved and arrangements would likely vary across the county, potentially complicating public service reform.
- It may be difficult to coordinate service delivery with VCSE partners due to the complexity of the sector across Kent and Medway.

3) Manages impacts for crucial services - social care, children's services, SEND and homelessness, and for wider public services including for public safety

Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary – benchmark (K&M)
3	2	2	2	4	5

Rationale

Overall assumptions and considerations:

- Cost and risk to service delivery presented by disaggregation is fundamental when considering the impact on the crucial services that this sub-criterion focusses on. As such, this was given greater weight when determining scores. Work is ongoing to better understand delivery risks and opportunities, and this will need to be included in any future LGR Business Case(s).

- Similarly, given the relationship between demand for people-based services and financial sustainability of authorities, opportunities and challenges relating to demand spread and management were also considered.
- Government is considering the potential for other policy and service delivery solutions for adults' and children's social care through vehicles such as social care partnerships; this is something that will continue to be monitored.
- Newton's modelling of demand and cost for people-based services provided useful background evidence to support the Transformation assessment report and the scoring of this criterion.

Option 1 (3 unitaries) – score 3/5

- Impact of disaggregation on crucial services is likely to be significant. Disruption to crucial service delivery, dilution of expertise, reduced capacity for innovation, duplication of systems and infrastructure, fragmentation of well- established and performing services and lower capacity for central functions like quality assurance is more likely in this option than in 1 and 2 unitary options.
- Purchasing power and market influence would reduce in this option compared to 1 and 2 unitary options but is higher than the 4-unitary options.
- This option maintains scale while introducing opportunities that are presented by smaller unitaries e.g. improved knowledge of local need, agility, flexibility and responsiveness.

Option 2, 3 & 4 (4 unitaries) – all scored 2/5

- Given reduced buying power, limited market shaping ability, cost of disaggregation, lack of scale to absorb cost surges or market issues and increased service delivery costs associated with smaller authorities, delivery of crucial services will be challenging. Scope to invest beyond this will be limited, e.g. in prevention or wider visible services as these authorities are likely to be all consumed by high-cost critical people services over which they will have limited control.
- This option creates the most imbalanced demographics across the unitary authorities, including for age and levels of deprivation which are both significant determinants of service demand, costs and revenue. For levels of deprivation, the 4UA options create the most disparity in deprivation between the authorities.
- Risk, complexity and cost of disaggregation would be felt most intensely in the 4 unitary options. This includes but is not limited to: risks associated with disruption/fragmentation of service delivery (particularly around safeguarding), diluted expertise across 4 organisations, increased significant cost through duplication of systems, risk associated with data transfer, disparity in service offer leading to a feeling of 'postcode lottery' for residents, and destabilisation of the market through introduction of additional parties and competition. Work is ongoing to better understand the disaggregation service delivery risks. The major risks of disaggregation had a significant impact on this score.
- The 4 unitary options scored 2 rather than 1 due to benefits presented by smaller authorities to potentially tailor services to local needs, increase agility in service delivery

models and contracts and increase responsiveness. However, these opportunities were mostly outweighed by the significant risks outlined above.

Option 5 (2 unitaries) – score 4/5

- Impact of disaggregation on crucial services is likely to be more manageable in a 2 unitary option. This option maintains enough scale to ensure authorities have the resilience to absorb transition costs and withstand the volatility and complexity associated with the delivery of crucial services.
- Purchasing power and market influence would still be significant in this option.
- Despite the disparity between East and West Kent, given the scale of the authorities in this option, resilience to meet the needs of areas of concentrated demand is still more manageable in a 2 unitary authority model than in options that offer 3 or more unitaries.
- For social care, the lower the number of authorities, the less disparity there is between authorities in current and future predicted demand across most types of adult and children social care including nursing, residential, domiciliary, children in care, children in need, child protection plans and referrals (from the Newton analysis).
- This option maintains scale while introducing opportunities that are presented by smaller unitaries e.g. Improved knowledge of local need, agility, flexibility, responsiveness.
- Many of the advantages of a single unitary apply to a lesser extent with this option.

Option 6 (1 unitary - benchmark) – score 5/5

- This option is the most likely option to be able to manage the risk associated with complex delivery of crucial services. The significant risk of disruption to service caused by disaggregation, particularly for safeguarding, is removed, although there would still be some potential for disruption by bringing together KCC and Medway Council services.
- Modelling shows that the probability of an authority achieving good or outstanding Ofsted rating for children's services reduces as the size of the authority shrinks. Given KCC's 'Outstanding' Ofsted rating for children's services and Medway Council's 'Good' Ofsted rating, it is important that the best aspects of current service delivery are not lost. For adult social care, CQC quality reporting data indicates an increased likelihood of a good CQC rating for larger local authorities.
- This option could give increased purchasing power, more market influence, greater capacity to shape more resilient and responsive markets. Newton's cost modelling for Adults' and Children's Social Care in Kent illustrates that scenarios involving multiple smaller authorities lead to higher service costs.
- This option creates fully balanced service demand levels for both adult and children social care.
- This approach maximises specialisation by leveraging the scale and capacity of a single, large authority. With increased resources and funding, this option allows for investment in dedicated teams, targeted training, and advanced technologies, enabling the development of expertise across key service areas such as safeguarding, housing and disability support.

- This option would have greatest financial stability to invest in prevention, it would also have greater capacity and strategic overview when developing strategy linked to prevention, and the expertise, infrastructure and data to deliver successful prevention.
- This option would have enough capacity to potentially design services in a way that harnesses the same or more benefits that smaller unitaries could through localised delivery models, if that is the decision of the new unitaries.
- This option is likely to ensure Kent retains a strong voice, when working with partners in other public sector services (NHS, Police etc) and Government, particularly on Kent based issues impacting crucial services e.g. issues related to the border with the EU.

Criterion D: Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views

Overall scores:

Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary – benchmark (K&M)
4	2	2	2	2	2

Summary for Criterion D

Before engaging residents and partners, it is difficult to draw firm conclusions on local views and these scores will need to be re-visited after any engagement takes place. However, based on proxy engagement intelligence along with evidence on deprivation, travel and living patterns, local service delivery geographies and the natural identities within the county, the three-unitary model is the most advantageous. It has good alignment with established identities and ways of living and provides the best middle ground between providing moderate value for money while not being too large and remote for residents and partners to engage with. The four-unitary options separate established communities and in some cases create unitaries with concentrated levels of deprivation. The two- and single-unitary options are likely to be too large to reflect local identities and be understood and accepted by residents, and risk not being able to respond to specific local needs.

Two sub-criteria were considered to generate the overall score for Criterion D:

- 1) Supported by partners and residents
- 2) Sensitive to issues of local identity and cultural and historic importance

Sub-criteria:

1) Supported by partners and local residents

Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary – benchmark (K&M)
4	2	2	2	3	2

Rationale

Overall assumptions and considerations:

- How much more Council Tax residents would have to pay through Council Tax harmonisation has been assumed to be a factor in how positively people might feel about the options.
- Council Tax and value for money are the most important things for residents, but there was also strong proxy evidence that showed residents expect:
 - Local, accessible services, that are responsive and easy to navigate with geography being less important than design.
 - Some say in local democratic decision making, but in reality, opportunities are not taken up by large numbers of residents, concluding that the perception that people can get involved is more important. A small proportion of the population will engage so the larger the area, the more representation.
 - Fair Council Tax distribution is important, and residents want to see where it has been spent. Most do not value back-office functions, management overheads and assets. There is some support for the concept of charging for non-statutory services.
- Engagement with the public has not yet been conducted, so this is a proxy exercise based on national research and local intelligence from resident feedback from a variety of sources about council services and relationships, including the annual budget consultation. To reflect this, scores for this sub-criterion are moderate for all options as there is insufficient evidence to conclude that the sub-criterion is not met or strongly met.
- Through the Kent Leaders work to develop the Interim Plan, key partners were asked which model they would prefer, and this has been taken into account. No specific geographies were outlined when partners were asked for feedback and views might have changed subsequently and change in the future.

Option 1 (3 unitaries) – score 4/5

- Partners had previously supported this option when asked and this model best matches the operational delivery arrangements for Health and Police.
- 50% of residents would pay more Council Tax, and 50% would pay less.
- This is a good ‘middle ground’ of strategic versus local that supports engagement in local decision making and visibility of services and where Council Tax is spent, while being more financially viable.
- Fewer council boundaries (compared to four-unitaries) mean less complexity for residents to access services and for partners to navigate.

Option 2 (4 unitaries) – score 2/5

- Locality is important to some residents who would prefer the smaller, more local unitaries that the four-unitary options offer.

- However, value for money and the reduction of back-office costs are important to residents and the four-unitary options are the least financially viable and deliver lowest efficiency.
- There is more fragmentation and the opportunity for strategic planning is reduced - people were interested in coordinated infrastructure such as transport links.
- More boundaries between unitaries would be introduced and residents might be charged to use services/assets across boundaries which might not be welcomed.
- Increased complexity for partners to work with councils across their delivery boundaries.
- 57% of residents would pay more Council Tax in this option.

Option 3 (4 unitaries) – score 2/5

- As above.
- 65% of residents would pay more Council Tax.

Option 4 (4 unitaries) – score 2/5

- As above.
- 54% of residents would pay more Council Tax.

Option 5 (2 unitaries) – score 3/5

- Efficiency and value for money for residents is higher in the two-unitary option, but this would be countered with concerns about more remote and less locally engaged councils.
- Less than half of residents would pay more Council Tax (48%) which might make it slightly better supported, and Council Tax increases may not need to be as severe due to the better financial position of these larger unitaries, although this is a decision for the new unitaries.
- Compared to other options, East and West are relatively well-balanced on deprivation and other factors, but communities in current West Kent Districts might perceive unfairness that they are levelling out deprivation, demand and debt in the North.

Option 6 (1 unitary - benchmark) – score 2/5

- Highest efficiency and value for money but countered by being the largest and least local arrangement – residents might feel this is too big and remote and would not be able to see where their Council Tax is being spent.
- Less than half of residents would pay more Council Tax (48%) which might make it slightly better supported, and Council Tax increases may not need to be as severe due to the better financial position of these larger unitaries, although this is a decision for the new unitaries.
- While there are no intra-county boundaries to navigate, the council might seem too large and complex for residents and local partners to engage with.

- Merging Kent and Medway as a single area would be unlikely to receive local or national support, as this is against Government's current policy position.

2) Sensitive to issues of local identity and cultural and historic importance

Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary – benchmark (K&M)
4	2	3	3	2	2

Rationale

Overall assumptions and considerations:

- All of the 4UA options have higher peak scores for Indices of Multiple Deprivation (IMD) compared to the 2UA and 3UA options, and therefore produce UAs that are more deprived overall as well as creating wider disparities between UAs.
- The polycentric nature of Kent and Medway means that employment and economic drivers are spread across different parts of the county – having higher number of UAs could mean that individual areas become over-dependent on fewer economic drivers.
- Resources will be required by UAs regardless of size to foster local identities, but their particular challenges around size and resource invert. Larger UAs will have more capacity/resource but will have bigger challenges to protect and build identities, heritage and culture at localised levels, whereas smaller UAs will be closer to their areas in this regard but will be more financially challenged in being able to resource place-shaping/protecting.
- For a number of the options, particularly Option 1, there is a case to consider boundary changes to incorporate Swanley into a North Kent UA and to incorporate East Swale/Faversham into an East Kent unitary to best reflect local identities and patterns.
- The four-unitary options have been identified by the Kent Leaders joint work on LGR so it is assumed there is some local support and reasoning for these groupings.

Option 1 (3 Unitaries) – score 4/5

- Comprises UAs that are smaller and therefore closer to residents than in the 1UA and 2UA options, but large enough to encompass broad and complementary identities, e.g. grouping coastal communities and those spanning the Thames Estuary (also being the only multiple UA option that keeps Medway and Swale together), which it was felt the 4UA options were unable to do.
- Largely coterminous with strategic partners' delivery models, and aligns with residents' travel to live patterns (work, education, healthcare).

Option 2 (4 Unitaries) – score 2/5

- This option groups Thanet and Swale together, making it the most deprived version of an East Kent UA which would likely have significant spending pressures meaning they will

have to focus resources on statutory services rather than place-making. It creates the biggest disparity between areas for deprivation.

- Splits up logical groupings, e.g. Swale from Medway, and Thanet from the other coastal areas of Dover and Folkestone & Hythe.
- However, this is one of the options generated by the Kent Leaders joint work so is assumed to have some local support.

Option 3 (4 Unitaries) – score 3/5

- The same area groupings are broken up as in option 2, but the disparity is not as pronounced as Option 2 from a deprivation perspective, because Swale and Thanet are not in the same UA. It does, however, preserve the recognised ‘East Kent Triangle’ of Canterbury, Thanet and Dover as a UA in itself.
- Putting Swale and Folkestone & Hythe into the same unitary does not seem a logical fit for aligned identities, economic areas or travel to work patterns.
- However, this is one of the options generated by the Kent Leaders joint work so is assumed to have some local support.

Option 4 (4 Unitaries) – score 3/5

- The groupings are not particularly well aligned, although the East Kent coastal communities are grouped together, Medway and Swale are still separated, as is Maidstone from West Kent - travel to work patterns are dissected.
- Creates the most affluent version of a West Kent UA: could entrench socio-economic divisions, and creates the UA with the highest area of protected land. This could make place-making harder in West Kent.
- However, this is one of the options generated by the Kent Leaders joint work so is assumed to have some local support.

Option 5 (2 unitaries) – score 2/5

- The scale of two unitaries could limit how reflective of local identities they would be and how agile and effective they could be in meeting specific local needs.
- This configuration could create an unhelpful East vs West dynamic; either East Kent feeling left behind or conversely resentment from West Kent if East Kent gets the majority of the resource/funding which could contribute to deadlock between the two UAs on pan-county issues.

Option 6 (1 unitary - benchmark) – score 2/5

- This option could have a better strategic approach to Kent as a destination/investment opportunity whereas this would be fragmented in the other options in the absence of a mayor/Mayoral Strategic Authority.
- However, it is just as remote as Option 5, albeit without a potentially divisive East/West boundary – the UA will have to work hard at fostering place-shaping at a local level and do it equitably, and would have to insert layers of local democracy/engagement to facilitate this.

Criterion E: New unitary structures must support devolution arrangements

Overall scores:

Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary – benchmark (K&M)
5	2	2	2	2	1

Summary for Criterion E

In the Devolution Priority Programme feedback letter, Government indicated that Kent and Medway requires LGR to create unitaries with more equally sized populations before devolution can be progressed. The three-unitary model fulfils this requirement and also has the advantage that the unitaries are functional economic areas, sensible planning geographies and would be relatively more financially sustainable than smaller unitaries, factors which could all support delivery of Mayoral Strategic Authority (MSA)/mayoral priorities. Under current Government policy, a single unitary would preclude devolution. The two-unitary option creates large and unequally sized populations and creates possible 'deadlock' in decision-making. In the four-unitary options, unitaries would lack capacity and financial resilience to both act as delivery arms for MSA/mayoral priorities and engage strategically as members of the MSA.

Two sub-criteria were considered to generate the overall score for Criterion E:

- 1) Will help unlock devolution
- 2) Sensible population size ratios between local authorities and any strategic authority, with timelines that work for both priorities

Sub-criteria:

1) Will help unlock devolution

Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary – benchmark (K&M)
5	2	2	2	2	1

Rationale

Overall assumptions and considerations:

- Without a Mayoral Strategic Authority (MSA) and a directly elected mayor, services that benefit from county-wide coordination, could become more fragmented, for example, strategic transport and planning and management of issues related to Kent's position at the border with Europe.
- Smaller unitary councils may face capacity challenges and lack economies of scale which is likely to reduce efficiency in service delivery of MSA/mayoral priorities and devolved responsibilities. Additionally, a unitary authority that is struggling financially may not have the ability to be a reliable partner at a pan-Kent level to contribute to collective strategy.

Option 1 (3 unitaries) – score 5/5

- Unitaries would have sufficient scale to engage directly with an MSA to deliver devolution and work with an MSA to address the socio-economic inequity across the county. The three unitary areas are functional areas to deliver a mayor's Strategic Planning responsibilities via Sustainable Development Strategies (SDSs).
- Broadly coterminous public service boundaries (Police, Health). The boundaries also match subregional economic areas, travel-to-work and learn.
- All infrastructure in the county to manage the movement of goods and people across the border is in one unitary (Eurotunnel, Port of Dover, Sevington Inland Border Facility and Manston Arrivals and Processing Centre).
- However, the East and North unitaries would be less financially resilient due to demand and debt levels in these areas.

Option 2 (4 unitaries) – score 2/5

- In this model there are accentuated financial and socio-economic disparities between East Kent, compared to North, and particularly West Kent. This option groups Swale and Thanet in East Kent, which are two of the most deprived Kent Districts, leading to a mayor, potentially, spending a disproportionate amount of effort on East Kent.
- 4UA's could be more focused on local priorities, ensuring more voices in local decision-making. Conversely, this could also lead to inertia. The unitaries would also not be as financially stable to deliver those priorities.
- This option separates the Manston Arrivals and Processing Centre from other infrastructure in the county to manage the movement of goods and people across the border, leading to an MSA having to work across multiple unitaries on border issues.
- A North Kent unitary may be less engaged with Kent and more so with the Mayor of London.

Option 3 (4 unitaries) – score 2/5

- There are financial and socio-economic disparities between East and West Kent. Although the 'East Kent Triangle' (Canterbury, Thanet and Dover) is an acknowledged functional area, it would still have financial and socio-economic challenges, compared to the other unitaries. This could lead to reduced capacity to work on mayoral priorities such as regeneration, particularly coastal regeneration. An MSA (particularly the mayor) could spend a disproportionate amount of effort on one unitary.
- 4UA's could be more focused on local priorities, ensuring more voices in local decision-making. Conversely, this could also lead to inertia.
- This option separates the Eurotunnel (Folkestone) and Sevington Inland Border Facility (Ashford) from the Port of Dover and Manston Arrivals and Processing Centre, leading to an MSA having to work across multiple unitaries.
- A North Kent unitary may be less engaged with Kent and more so with the Mayor of London.

Option 4 (4 unitaries) – score 2/5

- The financial and socio-economic differences between East Kent and West Kent are more acute than in Option 2 due to West Kent being consolidated into the affluent Districts of Sevenoaks, Tonbridge and Malling and Tunbridge Wells. This could impact on East Kent's ability to engage on an MSA level. An MSA (particularly the mayor) could spend a disproportionate amount of time on East Kent, with Mid Kent becoming overlooked.
- 4UA's could be more focused on local priorities, ensuring more voices in local decision-making. Conversely, this could also lead to inertia.
- Sevington Inland Border Facility is separate from all other infrastructure in the county to manage the movement of goods and people across the border
- This option may create issues for spatial planning, with the West unitary being resistant and unable (due to Green Belt restrictions and politics) to pursue higher levels of housing expansion.
- A North Kent unitary may be less engaged with Kent and more so with the Mayor of London.

Option 5 (2 unitaries) – score 2/5

- There would be a significant population disparity between the East and West unitaries. This option also groups Swale and Thanet in East Kent, which are two of the most deprived Kent Districts, leading to a mayor, potentially, spending a disproportionate amount of effort on East Kent.
- Unitaries would have sufficient scale to engage directly with an MSA to deliver devolution; and work with an MSA to address the socio-economic inequity across the county.
- The governance between an MSA and 2 unitary councils could be problematic in terms of decision-making, as the Mayor would not have a casting vote for all policy issues.
- This model provides greater capacity and resources to manage border impacts and place-based work – for example, coastal regeneration, however these roles could fall disproportionately on the East Kent unitary.
- Large unitaries could lack the localised understanding to respond to planning development.

Option 6 (1 unitary - benchmark) – score 1/5

- A single unitary council and MSA cannot be established on the same geographical footprint, as the new Kent and Medway council would have to combine with a neighbouring upper-tier authority to form an MSA. This is not possible, as all our neighbours are either on the Devolution Priority Programme (DPP) (Essex & Sussex) or the fast-track LGR programme (Surrey).
- A model that sought to subsume Medway Unitary Council could be unlikely to be supported locally and nationally.

- Significant negotiation and lobbying would be required to put an argument to government that the new Kent and Medway unitary could get devolution as a single area, as this is against their current policy position and is unlikely to be successful.

2) Sensible population size ratios between local authorities and any strategic authority, with timelines that work for both priorities

Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary – benchmark (K&M)
5	2	2	2	2	1

Rationale

Overall assumptions and considerations:

- Government's criteria for new Mayoral Strategic Authorities (MSAs) are a combined population of 1.5 million, or above. Kent and Medway's population size is estimated to be approximately 1,879,100. This would enable a Strategic Authority (SA) across the county footprint whichever option is applied.
- It is assumed that Government would prefer a broad equity of population size for new unitary councils within an MSA area, to conform with the 'guiding principle' of a 500,000 population.
- Timelines for devolution have not yet been confirmed by Government so this has not been considered in scoring. It is unlikely in Kent and Medway that there would be differences between timelines for different options.

Option 1 (3 unitaries) – score 5/5

- This model creates three substantial unitaries with similarly sized populations close to government's 'guiding principle' of a 500,000 population for LGR arrangements (North: 663,000, East: 662,000, West: 551,000) creating equal partners under an MSA.
- Population is the most well-balanced between authorities (only 20% disparity between the smallest and biggest unitaries).

Option 2 (4 unitaries) – score 2/5

- Two unitaries do not meet the 500,000 criteria - South Kent would be significantly under at 363,000 and East Kent at 452,858.
- This division produces a population disparity of 34% between the smallest and largest unitary authorities (South Kent and West Kent respectively).

Option 3 (4 unitaries) – score 2/5

- Two unitaries do not meet the 500,000 criteria – East (415,712) and Mid (400,466).
- This division produces a population disparity of 27% between the smallest and largest unitary authorities (Mid Kent and West Kent respectively).

Option 4 (4 unitaries) – score 2/5

- Two unitaries do not meet the 500,000 criteria - West (370,795) and Mid (470,657).
- This division produces a population disparity of 29% between the smallest and largest unitary authorities (West Kent and East Kent respectively).

Option 5 (2 unitaries) – score 2/5

- This would result in population ratios significantly higher than the 500,000 level and therefore presents a risk of not meeting the Government's criteria (although other areas are submitting proposals including populations of over 800,000).
- This division creates a 23% disparity in population size between the two proposed unitary authorities, which is unlikely to significantly narrow with projected population growth by 2035.

Option 6 (1 unitary - benchmark) – score 1/5

- This would result in a population very significantly higher than 500,000 at 1.9m, with the conclusion this would not meet the Government's criteria and therefore could not be said to support devolution ambitions.

Criterion F: New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment

Overall scores:

Option 1 3 unitary (N,E,W)	Option 2 4 unitary (W,N,E,S)	Option 3 4 unitary (M,W,N,E)	Option 4 4 unitary (N,E,M,W)	Option 5 2 unitary (E,W)	Option 6 1 unitary – benchmark (K&M)
3	3	4	4	2	2

Summary for Criterion F

Two of the four-unitary options have received the highest scores because, overall, smaller unitaries will operate more closely to communities, which some residents and partners feel is important. These options also meet the Boundary Commission's recommended councillor to resident ratio, whereas the other options exceed this. However, smaller unitaries might lack the resource capacity to run effective community engagement and address the local issues that are raised through these mechanisms. This is why the 4-unitary option with the highest levels of deprivation and disaggregation costs (option 2) has received a lower score. This is also why all scores for this criterion are in the medium range – there will always be a compromise between capacity and locality. How the new unitaries design their engagement mechanisms will be instrumental in how successful they are in enabling and empowering communities.

One sub-criterion was considered to generate the score for Criterion F:

- 1) Will enable strong community engagement

Rationale

Overall assumptions and considerations:

- UAs (primarily the 4UA options) covering smaller areas/populations are closer to residents and communities, and theoretically more capable of developing locally suitable engagement models. However, they may have financial challenges which might impact effective community engagement.
- UAs covering larger geographic areas and larger, more diverse populations could face greater challenges in engaging at a local level – they would need to have significant resource in place to manage relationships and develop/maintain suitable and flexible models for all areas. Large LAs have the capacity to engage but will not necessarily be able to do it effectively – this poses a risk.
- Analysis about the councillor to electorate ratios was based on the Local Government Boundary Commission for England (LGBCE)’s recommendation of a minimum of 30 and a maximum of 99 councillors for new unitaries, and their review of Cornwall Council’s electoral arrangements which recommended a number of councillors that produced a ratio of 5,163 electors per councillor.
- Larger infrastructure VCSE organisations will be more comfortable engaging with larger, fewer UAs, but small or micro VCSE organisations will engage at a much more local level.
- Introducing layers of local democracy (e.g. through strengthened or increased numbers of town/parish councils) and community engagement (e.g. through local community boards or forums) will be required in all of the UA options in a sliding scale. Town and parish council coverage is inconsistent across Kent and Medway so would need considerable development to use this as a viable and standardised option across the UAs. In addition, the anticipated Communities white paper’s position on the precepting of new town or parish councils is, as yet, unknown – this might pose a significant challenge for viability.
- Further work will be needed to understand the scale and costs of introducing and sustainably running local community boards (or the Government’s favoured ‘Neighbourhood Area Committees’ which are as yet undefined) at a meaningful community level within prospective UAs.
- It is also necessary to engage with local communities to understand their preferences for local involvement and democracy.

Option 1 (3 unitaries) – score 3/5

- This option provides a councillor ratio between 79 to 92 per UA, which is close to the upper limit of LGBCE’s recommended ratios.
- This option’s logical local place/area groupings might facilitate more effective local engagement about what affects those communities (e.g. engaging coastal communities on coastal issues) but unitaries would operate further from local communities than in the four-unitary options.

Option 2 (4 unitaries) – score 3/5

- The councillor numbers of between 49 and 79 per UA best suit the LGBCE's recommended councillor ratio.
- However, this option scores lower than the other 4UA options because its highest deprivation factor may result in spending pressures affecting unitaries' ability to resource community engagement/localised democracy.

Option 3 (4 unitaries) – score 4/5

- The councillor numbers of between 53 and 79 per UA best suit the LGBCE's recommended councillor ratio.
- Scores joint highest with Option 4 because this model puts the UAs closest to their residents.

Option 4 (4 unitaries) – score 4/5

- Councillor numbers of between 53 and 71 per UA best suit LGBCE's recommendations. This option also creates the most even spread of councillors across the four UAs.
- Scores joint highest with Option 3 because this model puts the UAs closest to their residents.

Option 5 (2 unitaries) – score 2/5

- This option's Councillor numbers (East 111, West 150) and electorate ratios (East 5801 per councillor, West 7824 per councillor) are in excess of LGBCE's recommendations.
- Unitaries would have greater capacity to invest in community engagement mechanisms.
- However, due to the large size of the two UAs, it is likely that significant resource and mechanisms would be required to manage meaningful community engagement at a sufficiently local level across the county area to capture and act on community needs adequately. In addition, most of the north's population live in unparished urban areas and without town councils and are much more ethnically and religiously diverse – a stark difference to the rest of communities in this version of a West Kent UA which would require tailored engagement approaches.

Option 6 (1 unitary - benchmark) – score 2/5

- Councillor numbers (261) and elector ratio of 13,625 per councillor are in considerable excess of the LGBCE's recommendations.
- As with Option 5, the unitary would have greater capacity for community engagement but due to the considerable size of a single UA, significant resource and mechanisms would be required to manage meaningful community engagement at a sufficiently local level across the county area to capture and act on community needs adequately.

Financial assessment

Contents

Approach 2

Overview 4

Overall findings..... 5

Detailed findings..... 7

 Option 1 – 3UA 7

 Option 2 – 4UA (N, E, S, W)..... 10

 Option 3 – 4UA (N, E, M, W) 13

 Option 4 – 4UA (N, E, M, W) 16

 Option 5 – 2UA 19

 Option 6 – 1UA (benchmark) 22

Approach

The evidence presented in this assessment comes from three sources –

- Analysis conducted internally by the KCC Finance team, which considered:
 - Council tax harmonisation and council tax yield in the potential new unitary authorities based on 2024-25 tax base estimates and individual council tax rates.
 - Levels of debt and reserves across the 14 councils in the Kent and Medway area.
 - The Adult Social Care, Children's Social Care and Home to School Transport 'legacy' costs which the new unitary authorities would inherit following disaggregation¹.
- Commissioned analysis by Newton, which considered:
 - Disaggregation costs for people-based services (Adult Social Care, Children's Social Care, and services for children with SEND), drawing on data supplied by KCC. This approach is based on a hybrid model including both disproportionately inherited costs on day one (using a general model designed to allow comparisons between proposed scenarios rather than detailed financial analysis) as well as additional future costs.
- Commissioned analysis by PwC, which considered:
 - Overall additional operational costs and benefits and initial transition costs arising from new unitary scenarios. Their modelling incorporated structural and management costs, redundancy estimates, senior leadership changes and anticipated savings. In their reports, PwC acknowledge the limitations of their modelling and describe it as an 'initial assessment' and state that more work would be required to generate more detailed figures.

The evidence outlined in this assessment should be considered alongside certain contextual and methodological factors, set out below.

Rounding

- In parts of this summary, the total sum of a set of figures may differ slightly from what is reported by 1 or 0.1. This is due to rounding differences and does not indicate an error in reporting.

Balance analysis

- Balance analysis is a method used to evaluate the distribution of factors in different scenarios, aiming for equitable outcomes. It examines measures like council tax receipts, costs and deprivation for example. A balance score near 1 indicates an optimal distribution with equitable resource allocation, while a larger number indicates potential imbalances.

¹ Costs are based on allocating forecast/actual KCC net spend (i.e. spending less any attributable income largely from specific grants, partner contributions and client charges) for 2024-25 according to the geographical areas where costs are currently incurred. The analysis is based on a direct allocation of service costs wherever possible (including where direct allocation is not possible at appropriate apportionment). The purpose of this is to identify where these costs are currently disproportionately distributed (either per head of population or proportionate to band D equivalent council tax base) at no overall additional cost compared to current KCC spend. This analysis does not attempt to identify the additional service costs the unitary authorities would incur either on day one or over time due to diseconomies of scale, or due to differential rates of growth. The analysis is based solely on KCC spend and at this stage does not include Medway which would need to be added in on a like for like basis (using the Revenue Outturn submissions when these become available)

Council tax harmonisation

- The new unitary authorities will need to decide their approach to council tax harmonisation. They may choose to harmonise in line with the district which has the highest rate of council tax, meaning that most residents would pay more council tax, but that the unitary authority would likely have a higher tax yield and be more financially sustainable. Or they may choose to harmonise at the lowest rate or at a mid-point between these figures. These choices will require trade-offs and will inevitably pose political challenges. For this assessment of the implications of council tax harmonisation, the average rate of council tax has been used. This has been used purely to allow for comparison and does not presuppose where the new unitary authorities will set their council tax rates or indicate a KCC position on the matter.

Transition and disaggregation

- As set out above, the PwC analysis of the recurring costs and benefits of the transition should be considered an ‘initial’ assessment as more detailed work is required. However, this is the only evidence currently available which sets out the potential overall costs and benefits of the different reorganisation scenarios. While there may need to be some updates to the figures following more work, the analysis provides a useful basis upon which to compare the overall trends for the different options.
- The Newton analysis of disaggregation costs for people-based services – Adult Social Care, Children’s Social Care, and services for children with SEND – was conducted on a formulaic basis using data provided by KCC. The broad trends are consistent with the more detailed analysis carried out by KCC Finance team.
- The analysis conducted internally by KCC focussed on the disaggregation of current spend and estimated share of resources of Adult Social Care, Children’s Social Services and Home to School Transport. This was largely based on mapping the cost of individual client packages to locality areas and thus provided a higher level of detail than the analyses by PwC or Newton but was limited to the KCC area (i.e. excludes Medway) and current spend.

Debt and reserves

- The analysis of levels of debt and reserves is based on figures from September 2024. These figures were the most recently available at the time of analysis and drafting of this report.

Overview

This report assesses the financial implications of unitary authorities across the six different options. For ease of reference, the table below provide a quick overview of the forecast additional costs and benefits from establishment of unitary authorities to replace current two-tier structures. The overview makes no assessment of the viability of individual authorities and is only a starting point for comparison. The financial summary is shown in line with central government financial appraisal guidelines with additional costs shown as negatives and savings as positives, this is contrary to normal local authority budgeting conventions where costs are shown as positives and savings/income as negatives. More detailed financial analysis for each of the proposed models is included in the following sections and should be considered alongside this initial assessment. The figures reported in this table show that fewer unitary authorities would result in quicker 'payback' following initial transition costs. In a 4UA model the initial transition costs would never be recovered as the operating model represents a recurring net additional cost of £5.4m each year following the establishment of unitary authorities.

Financial summary - based on PwC assessment only.

	Option 1 3 unitaries	Option 2 4 unitaries	Option 3 4 unitaries	Option 4 4 unitaries	Option 5 2 unitaries	Option 6 1 unitary
Gross annual benefit	£37.7m	£34.7m			£40.6m	£49.4m
Recurring annual cost	- £28.4m	- £40.0m			- £24.1m	£0
Net recurring benefit per annum	£9.3m	- £5.4m			£16.5m	£49.4m
Transition cost	- £42.6m	- £54.7m			- £25.8m	- £23.2m
Net phased benefit after 10 years	£16.4m	- £143.6m			£102.6m	£426.6m
Payback period	8.2 years	N/A			3.8 years	< 1 year
Council Tax harmonisation (total income gained / foregone in Years 1-7 based on harmonisation to high-point)	£148.7m	£140.4m	- £0.1m	£54.9m	£196m	£193m

Option 6 is included as a benchmark.

Overall findings

- Unitarisation costs** – PwC’s modelling of the forecasts for initial transition costs and ongoing recurring costs and benefits of unitarisation show that the short term and long-term costs are higher when more new unitary authorities are created, and inversely the costs are lower when fewer new unitary authorities are created. They found that for the benchmark model (1UA model), the ‘payback period’ for the initial costs of unitarisation would be less than a year and there would be a net benefit of £426.6m over 10 years. The 2UA model paid back after 3.8 years and would return £102.2m after 10 years; and the 3UA paid back after 8.2 years and would return £16.4m after 10 years. Significantly, they found that the initial costs for moving to a 4UA model would never be paid back, because in both the short term and long term a 4UA model would incur recurring financial losses.
- Council tax harmonisation** – As set out above, the new unitary authorities will decide their own approach to harmonisation. There will inevitably be political and financial risks associated with such a decision. Harmonising at a low point may be considered more politically palatable but would result in lower council tax yields, while harmonising at a high point may be politically challenging but would result in higher council tax yields.
- Council tax harmonisation** – In all of the models (aside from the benchmark 1UA model), when harmonising at an average point, there is a disparity in the amount of council tax raised per resident between the West unitary authority and the other authorities, with West Kent having greater revenue raising potential. This reflects the higher property values in the districts which would make up the West Kent unitary authority. The disparity is most pronounced in the 4UA model - Option 4 which groups together Sevenoaks, Tonbridge and Malling, and Tunbridge Wells. In this model, the council tax yield per resident in the West Kent unitary authority would be £767 compared to £589 per resident in the North Kent unitary authority, which gives a balance ratio of 1.3.

Balance ratio from internal KCC analysis – a score close to 1 indicates strong balance

Variation in overall council tax yield and council tax yield per resident when harmonising at average point

	Option 1 3 unitaries	Option 2 4 unitaries	Option 3 4 unitaries	Option 4 4 unitaries	Option 5 2 unitaries	Option 6 1 unitary
Balance ratio for overall tax yield	1.09	1.72	1.60	1.19	1.38	No variation
Balance ratio for tax yield per resident	1.27	1.28	1.28	1.30	1.06	No variation

- Disaggregation** – Newton’s modelling of the costs of disaggregating people-based services showed that fewer new unitary authorities result in lower costs (see table below). The 1UA model (the benchmark model) was the only one which showed an annual cost saving at £16.9m lower than the current baseline (£1.5bn), while the costs for the 4UA model – Option 2 would be £22.7m higher than the baseline.

Disaggregation costs from Newton analysis only.

Change in spend on people-based services from baseline in 2025.

	Option 1 3 unitaries	Option 2 4 unitaries	Option 3 4 unitaries	Option 4 4 unitaries	Option 5 2 unitaries	Option 6 1 unitary
Change from Baseline 2025	- £14.9m	- £22.7m	- £20.8m	- £19.1m	- £4.9m	£16.2m

- **Disaggregation** – Both Newton’s and KCC’s analysis of the costs of disaggregating people-based services found that the costs are not spread evenly across the county, with particularly high costs in Eastern areas and to a lesser degree in Northern areas. There are two main factors which explain this. Firstly, there is a high cost per resident of Adult Social Care in Folkestone & Hythe and in Dover due to the high proportion of the County’s care placements for vulnerable adults in these districts. And secondly, because the costs for Children’s Social Services correlate with levels of deprivation, with particularly high costs per resident in Thanet, Swale, and Folkestone & Hythe districts.
- **Debt and reserves** – In all of the models, the West Kent unitary authority will inherit lower levels of debt and higher levels of reserves than the other unitary authorities, indicating that the West Kent unitary authority will be more financially resilient. As part of LGR negotiations, KCC’s debt and reserves will need to be distributed between the new unitary authorities (aside from in the benchmark 1UA model). Depending on the distribution, this process could go some way to mitigating disparities, but these negotiations are likely to be challenging so it is important that this is done in a fair and transparent manner.
- **The Fair Funding Review** – The points above clearly indicate financial disparities in all of the proposed models (aside from the benchmark 1UA model). The West Kent unitary authority will inherit a more sustainable level of debt to reserves, higher revenue raising potential, and lower costs per resident for people-based services than the other unitary authorities. New unitary authorities which cover Eastern, Southern and Northern parts of the county will likely face significant spending pressures to deliver statutory services.

Current Government policy is to review and update the approach to determining funding allocations for local authorities. One of the aims is for funding to more closely match levels of relative needs and resources taking account of differential costs of delivering services and the revenue raising abilities of local authorities. This should result in areas with high levels of need and limited spending power receiving more funding. The approach is still being developed (the Fair Funding Review 2.0 is being consulted on from June to August 2025) but if these aims are met, some of financial disparity between unitary authorities in Kent and Medway should be mitigated by higher government funding and tax equalisation.

Detailed findings

Option 1 – 3UA

Unitarisation costs

- The PwC analysis of the initial costs of unitarisation in a 3UA model found a ‘one-off transition cost’ of £42.6m.
- PwC calculated a recurring annual cost of £28.4m, and a gross annual benefit of £37.7m. This gives a recurring annual benefit of unitarisation of £9.3m.
- Taking into account the initial cost of £42.6m, the ‘payback’ period of unitarisation would be 8.2 years and there would be £16.4m net benefit after 10 years.

Council tax harmonisation

- The new unitary authorities will need to decide the council tax rate at which they harmonise. This will be at a point between the highest rate of council tax among the constituent authorities and the lowest rate. The table below sets out three scenarios on what the annual council tax for a Band D property could be in the new unitary authorities after harmonisation (based on current rates):

Council tax harmonisation	Low point	Average point	High point
North Kent	£1,754.69	£1,789.89	£1,841.85
West Kent	£1,815.99	£1,859.93	£1,903.77
East Kent	£1,798.78	£1,849.50	£1,906.78
Balance ratio	1.03	1.04	1.04

- These rates are relatively equitable with a ratio of between 1.03 and 1.04 between the highest rates and lowest rates in the different scenarios.
- There will inevitably be residents who will have to pay more or less than their current rate of council tax. If harmonising at the average rate, residents in Ashford would have the biggest increase to their council tax at £50.72, while residents in Folkestone and Hythe would have the biggest decrease of £57.28.
- Overall, when harmonising at the average rate within the 3UA model, 50% of residents would be paying more council tax and 50% would be paying less council tax. Within the North Kent authority 42% would pay more council tax, in the West Kent authority 69% would pay more council tax and in the East Kent authority 42% would pay more council tax.
- At the average rate of harmonisation, the overall tax yield for each new unitary authority would be relatively equitable. As set out in the table below, the East Kent unitary authority would raise £427m compared to £391m in the North Kent unitary authority - this is an overall difference of £36m, a percentage difference of 9%, and a balance ratio of 1.09.

- However, when looking at the tax yield per resident, the differences between the unitary authorities are greater, with £589 per resident in North Kent compared to £750 in West Kent. This is a percentage difference of 27% and a balance ratio of 1.27. This is reflective of the greater affluence and revenue generation potential in the West Kent unitary authority.

Unitary authority	Overall tax yield	Tax yield per resident
North Kent	£390.7m	£589
West Kent	£413.8m	£751
East Kent	£427.2m	£646
Balance ratio	1.09	1.27

- KCC Finance team modelled the ‘year 1’ council tax yield following harmonisation. If harmonising high, the overall council tax yield in the 3UA model would be £34.3m higher than the baseline, and if harmonising low the overall council tax yield would be £29.2m lower than the baseline. The potential financial gains and losses are greater than in the 4UA models, but are lower compared to the 2UA model or the benchmark 1UA model.

Transition and Disaggregation

Newton modelling of disaggregation costs

- Newton modelled the costs of disaggregating people-based services – Adult Social Care, Children’s Social Care, and services for children with SEND – using data provided to them by KCC. In a 3UA model, the total additional cost for people-based services after disaggregation (for 2025) was £14.9m, which is a 1% increase against the baseline (the current figure is £1.5bn).
- Across the Kent and Medway area, this equates to a spend of £767 per resident. However, the costs of people-based services are not spread evenly. There would be particular pressure on the East Kent unitary authority which would have a £885 spend per resident – an increase of 15.3% against the baseline. The North Kent unitary authority would have a spend of £729 per resident which is a decrease of 4.9% against the baseline; and the West Kent unitary authority would have a spend of £693 which is a decrease of 9.6% against the baseline.
 - The difference between the highest spend per resident in East Kent compared to the lowest spend per resident in West Kent is £192
 - The ratio between East and West Kent is 1.28
 - The percentage difference is 27.7%
- The overall disaggregation costs for people-based services in a 3UA model are lower than in any of the 4UA models, but are higher than in the 2UA or 1UA models.

KCC analysis of disaggregation costs

- Internal KCC analysis of the ‘legacy costs’ of Adult Social Care ‘Community Teams’ (covering the KCC area only) shows the same overall pattern, with the East Kent unitary authority inheriting the highest costs per resident. The cost per resident in the East Kent unitary authority would be £402, in the North Kent unitary authority it would be £241 and in the West Kent unitary authority it would be £291. This is a balance ratio of 1.67. To a large extent, this can be explained by the much higher than average (£325) costs per resident in Folkestone and Hythe (£623) and Dover (£471) districts. The reason these districts have the highest spend is because they provide a high proportion of the county’s care placements for vulnerable adults. This is however, more balanced than any of the 4UA models as the legacy costs are distributed across larger authorities.

- Internal KCC analysis of the legacy costs of Children's Social Services (CSC) and Home to School Transport (HTST) show similar patterns with the highest spend in the North and East Kent unitary authorities. For CSC, in the North and East Kent unitary authorities, the cost per resident would be £153 and £152 respectively, and in the West Kent unitary authority it would be much lower at £79 per resident. This is balance ratio of 1.94.
- For HTST the costs are £55 per resident in North Kent, £48 in West Kent and £38 in East Kent. This is a balance ratio of 1.44.
- When considering the higher spend per resident on people-based services, combined with the lower tax yield per resident in East and North Kent, it is likely that these authorities will inherit significant spending pressures to meet statutory obligations.

Debt and reserves

- Internal KCC analysis of the amount of debt and reserves held by councils across Kent and Medway shows a disparity between the West Kent unitary authority, which will inherit low levels of debt, and the North and East Kent unitary authorities, which will inherit high levels of debt.
- Medway and Gravesham in the North both hold high levels of debt compared to their reserves, at £14.15 and £10.50 debt per £1 in reserves respectively. And in West Kent, Sevenoaks, Tonbridge and Malling, and Tunbridge Wells have very low levels of debt.
- Please note that the combined figures presented in the table below do not include the debt and reserves held by KCC. As part of LGR negotiations, these would need to be distributed across the new unitary authorities fairly to support their financial viability. The figures presented under the 'combined' heading are for the councils (i.e. the districts and Medway) that would be the constituent members of the potential new unitary authorities.

Unitary authority	Combined reserves	Combined debt	Level of debt per £1 in reserves	Reserves to debt %
North Kent	£143.5m	£724.2m	£5.05	24.16%
West Kent	£115.6m	£60.2m	£0.52	62.37%
East Kent	£154.5m	£695.6m	£4.50	27.96%
KCC (to be distributed)	£357.6m	£934.5m	£2.61	38.3%

Option 2 – 4UA (N, E, S, W)

Unitarisation costs

- Analysis undertaken by PwC shows that the establishment of four unitary authorities would generate initial transition costs of £54.7m.
- PwC calculated a recurring annual cost of £40m, and a gross annual benefit of £34.7m. This results in a recurring net annual cost of unitarisation of £5.4m.
- It is important to note that the figures outlined above are consistent across all of the four unitary models, irrespective of the different geographical configurations.
- Similarly, there is no payback period for any of the four unitary models – i.e. the unitary authorities would never return to a breakeven point.

Council tax harmonisation

- The new unitary authorities will need to decide the council tax rate at which they harmonise. This will be at a point between the highest rate of council tax among the constituent authorities and the lowest rate. The table below sets out three scenarios on what the annual council tax for a Band D property could be in the new unitary authorities after harmonisation (based on current rates):

Council tax harmonisation	Low point	Average point	High point
North Kent	£1,754.69	£1,783.41	£1,841.85
East Kent	£1,811.52	£1,844.77	£1,874.00
South Kent	£1,798.78	£1,840.33	£1,906.78
West Kent	£1,815.99	£1,859.93	£1,903.77
Balance ratio	1.03	1.04	1.04

- These rates are all relatively equitable with ratios of between 1.03 and 1.04.
- There will inevitably be residents who will have to pay more or less than their current rate of council tax. For example, if harmonising at the average rate, residents in Tunbridge Wells would see the biggest council tax increase of £50.72, while residents in Folkestone and Hythe would see the biggest council tax decrease of £66.45.
- Overall, when harmonising at the average rate within this 4UA model, 57% of residents would be paying more council tax and 43% would be paying less council tax. Within the North Kent authority 54% would pay more council tax, in the East Kent authority 34% would pay more, and in the South and West Kent authorities 69% would pay more.
- At the average rate of harmonisation, the overall tax yield between different unitaries varies considerably (see table below). For example, West Kent would raise £414m compared to £241m in South Kent – this is an overall difference of £173m, a percentage difference of 72%, and a balance ratio of 1.72. This is largely as a result of the considerable population difference between the two authorities.

- When looking at the tax yield per resident, the greatest disparity exists between North Kent (£589) and West Kent (£751). This is a percentage difference of 28% and a balance ratio of 1.28. This is because, whilst population sizes are relatively similar between the two authorities, West Kent is generally more affluent and therefore has potential to generate more revenue.
- This model results in the least equitable distribution of council tax across all of the different options.

Unitary authority	Overall tax yield	Tax yield per resident
North Kent	£299.5m	£589
East Kent	£277m	£612
South Kent	£241.4m	£664
West Kent	£413.8m	£751
Balance ratio	1.72	1.28

- KCC Finance team modelled the ‘year 1’ council tax yield following harmonisation. If harmonising high, the overall council tax yield in this 4UA model would be £32.7m higher than the baseline, and if harmonising low the overall council tax yield would be £25m lower than the baseline. The potential financial gains and losses in the 4UA models are lower than in the other models.

Transition and Disaggregation

Newton modelling of disaggregation costs

- Newton modelled the costs of disaggregating people-based services – Adult Social Care, Children’s Social Care, and services for children with SEND – using data provided to them by KCC. In this 4UA model, the total additional cost for people-based services after disaggregation (for 2025) is £22.7m, which is a 1.52% increase against the baseline (the current figure is £1.5bn).
- Across the Kent and Medway area, this equates to a spend of £767 per resident. However, the costs of people-based services are not spread evenly. There would be particular pressure on the South Kent unitary authority which would have a spend of £935 per resident – an increase of 21.9% against the baseline. The North Kent unitary authority would have a spend of £730 per resident which is a decrease of 4.9% against the baseline; the East Kent unitary authority would have a spend of £808 which is an increase of 5.4% against the baseline; and the West Kent unitary authority would have a spend of £693 which is a decrease of 9.6% against the baseline.
 - The difference between the highest spend per resident in South Kent compared to the lowest spend per resident in West Kent is £242.
 - The ratio between South and West Kent is 1.35.
 - The percentage difference is 34.9%.

KCC analysis of disaggregation costs

- Internal KCC analysis of the ‘legacy costs’ of Adult Social Care ‘Community Teams’ (covering the KCC area only) shows the same overall pattern, with the South Kent unitary authority inheriting the highest costs per resident. The cost per resident in the South Kent unitary authority would be £440, in East Kent it would be £329, in North Kent it would be £216 and in West Kent it would be £291. This is a balance ratio of 2.03 which is high compared to other options. This can largely be explained by the much higher than average (£325) costs per resident in Folkestone and Hythe (£623) and Dover (£471) districts. The reason these districts have the highest spend is because they provide a high proportion of the county’s care for vulnerable adults.

- Internal KCC analysis of the legacy costs of Children’s Social Services (CSC) and Home to School Transport (HTST) show similar patterns with the highest spend in the East and South Kent unitary authorities. For CSC, in the East and South Kent unitary authorities, the cost per resident would be £171 and £141 respectively. In North Kent it would be £134 and in West Kent it would be much lower at £79 per resident. This is a balance ratio of 2.16. The difference between the highest and lowest CSC costs are highest in this model, both overall (i.e. when compared against the 1, 2 and 3UA options) and also when compared against the other 4UA options.
- For HTST, the costs are more balanced at £48 per resident in both East and West Kent, £46 in North Kent and £39 in South Kent. This is a balance ratio of 1.23.
- Overall, when considering the higher spend per resident on people-based services and the lower tax yield per resident in South and East Kent, it is likely that there will be significant spending pressures to meet statutory obligations in these authorities.

Debt and reserves

- Internal KCC analysis of the amount of debt and reserves held by councils across Kent and Medway shows a disparity between the West Kent unitary authority, which will inherit low levels of debt, and the other unitary authorities, which will inherit higher levels of debt.
- Please note that the combined figures presented in the table below do not include the debt and reserves held by KCC. As part of LGR negotiations, these would need to be distributed across the new unitary authorities fairly to support their financial viability. The figures presented under the ‘combined’ heading are for the councils (i.e. the districts and Medway) that would be the constituent members of the potential new unitary authorities.

Unitary authority	Combined reserves	Combined debt	Level of debt per £1 in reserves	Reserves to debt %
North Kent	£123.5m	£714.2m	£5.78	20.58%
East Kent	£72.4m	£216.8m	£2.99	36.09%
South Kent	£102.1m	£488.9m	£4.79	26.16%
West Kent	£115.6m	£60.2m	£0.52	62.37%
KCC (to be distributed)	£357.6m	£934.5m	£2.61	38.3%

Option 3 – 4UA (N, E, M, W)

Unitarisation costs

- Analysis undertaken by PwC shows that the establishment of four unitary authorities would generate initial transition costs of £54.7m.
- PwC calculated a recurring annual cost of £40m, and a gross annual benefit of £34.7m. This results in a recurring net annual cost of unitarisation of £5.4m.
- It is important to note that the figures outlined above are consistent across all of the four unitary models, irrespective of the different geographical configurations.
- Similarly, there is no payback period for any of the four unitary models – i.e. the unitary authorities would never return to a breakeven point.

Council tax harmonisation

- The new unitary authorities will need to decide the council tax rate at which they harmonise. This will be at a point between the highest rate of council tax among the constituent authorities and the lowest rate. The table below sets out three scenarios on what the annual council tax for a Band D property could be in the new unitary authorities after harmonisation (based on current rates):

Council tax harmonisation	Low point	Average point	High point
North Kent	£1,754.69	£1,783.41	£1,841.85
East Kent	£1,825.20	£1,850.99	£1,874.00
Mid Kent	£1,798.78	£1,834.41	£1,906.78
West Kent	£1,815.99	£1,859.93	£1,903.77
Balance ratio	1.04	1.04	1.04

- These rates are relatively equitable with a ratio of 1.04 the highest rates in West Kent and the lowest rate in North Kent.
- There will inevitably be residents who will have to pay more or less than their current rate of council tax. If harmonising at the average rate, residents in Tunbridge Wells would see the biggest council tax increase of £43.94, while residents in Folkestone and Hythe would see the biggest council tax decrease of £72.37.
- Overall, when harmonising at the average rate within this 4UA model, 65% of residents would be paying more council tax and 35% would be paying less council tax. Within the North Kent authority 54% would pay more council tax, in the East Kent authority 67% would pay more, in the Mid Kent authority 71% would pay more, and in the West Kent authority 69% would pay more.
- At the average rate of harmonisation, the overall tax yield varies considerably between West Kent and other parts of the county (see table below). For example, West Kent would raise £414m compared to £258m in Mid Kent – this is an overall difference of £156m, a percentage difference of 60%, and a balance ratio of 1.6. This is largely as a result of the population difference between the two authorities.

- When looking at the tax yield per resident, the findings remain consistent with those outlined earlier for the other 4UA model - the greatest disparity exists between North Kent (£589) and West Kent (£751). This is a percentage difference of 28% and a balance ratio of 1.28. This is because, whilst population sizes are relatively similar between the two authorities, West Kent is generally more affluent and therefore has potential to generate more revenue.

Unitary authority	Overall tax yield	Tax yield per resident
North Kent	£299.5m	£589
East Kent	£260.4m	£626
Mid Kent	£258m	£644
West Kent	£413.8m	£751
Balance ratio	1.60	1.28

- KCC Finance team modelled the 'year 1' council tax yield following harmonisation. If harmonising high, the overall council tax yield in this 4UA model would be £33.0m higher than the baseline, and if harmonising low the overall council tax yield would be £23.2m lower than the baseline. The potential financial gains and losses in the 4UA models are lower than in the other models. Of the 4UA models, this option has the highest potential gains and lowest potential losses (though it is very marginal).

Transition and Disaggregation

Newton modelling of disaggregation costs

- Newton modelled the costs of disaggregating people-based services – Adult Social Care, Children's Social Care, and services for children with SEND – using data provided to them by KCC. In this 4UA model, the total additional cost for people-based services after disaggregation (for 2025) is £20.8m, which is a 1.39% increase against the baseline (the current figure is £1.5bn).
- Across the Kent and Medway area, this equates to a spend of £767 per resident. However, the costs of people-based services are not spread evenly. There would be particular pressure on the East Kent unitary authority which would have a spend of £894 per resident – an increase of 16.6% against the baseline. The North Kent unitary authority would have a spend of £730 per resident which is a decrease of 4.9% against the baseline; the Mid Kent unitary authority would have a spend of £829 which is an increase of 8.1% against the baseline; and the West Kent unitary authority would have a spend of £693 which is a decrease of 9.6% against the baseline.
 - The difference between the highest spend per resident in the East compared to the lowest spend per resident in the West is £201
 - The ratio between the East and West is 1.29
 - The percentage difference is 29%

KCC analysis of disaggregation costs

- Internal KCC analysis of the 'legacy costs' of Adult Social Care 'Community Teams' (covering the KCC area only) shows the same overall pattern, with the East Kent unitary authority inheriting the highest costs per resident, closely followed by the Mid Kent unitary authority. The cost per resident in the East Kent unitary authority would be £389, in the Mid Kent unitary authority it would be £366, in the North Kent unitary authority it would be £216 and in the West Kent unitary authority it would be £291. This is a balance ratio of 1.8 which is more balanced compared to the 4UA options. This is because Dover and Folkestone and Hythe are in separate unitary authorities so the high legacy costs are spread across different unitary areas.

- This model results in the least disparity between the highest and lowest spend per resident when compared against the other 4UA options. This is largely because under this configuration Folkestone and Hythe and Dover are split across the Mid and East Kent unitary authorities.
- Internal KCC analysis of the legacy costs of Children's Social Services (CSC) and Home to School Transport (HTST) show similar patterns with the highest spend in the Mid and East unitary authorities. For CSC, in the Mid and East Kent unitary authorities the cost per resident would be £162 and £153 respectively. In North Kent it would be £134 and in West Kent it would be much lower at £79 per resident. This is a balance ratio of 2.05.
- For HTST, the costs are more balanced at £49 per resident in Mid Kent, £48 per resident in West Kent, £46 in North Kent and £40 in East Kent. This is a balance ratio of 1.23.
- Overall, when considering the higher spend per resident on people-based services and the lower tax yield per resident in East and Mid Kent, it is likely that there will be significant spending pressures to meet statutory obligations in these authorities.

Debt and reserves

- Internal KCC analysis of the amount of debt and reserves held by councils across Kent and Medway shows a disparity between the West Kent unitary authority, which will inherit low levels of debt, and the other unitary authorities, which will inherit higher levels of debt.
- Please note that the combined figures presented in the table below do not include the debt and reserves held by KCC. As part of LGR negotiations, these would need to be distributed across the new unitary authorities fairly to support their financial viability. The figures presented under the 'combined' heading are for the councils (i.e. the districts and Medway) that would be the constituent members of the potential new unitary authorities.

Unitary authority	Combined reserves	Combined debt	Level of debt per £1 in reserves	Reserves to debt %
North Kent	£123.5m	£714.2m	£5.78	20.58%
East Kent	£101m	£338.1m	£3.35	33.39%
Mid Kent	£73.5m	£367.6m	£5.00	27.12%
West Kent	£115.6m	£60.2m	£0.52	62.37%
KCC (to be distributed)	£357.6m	£934.5m	£2.61	38.3%

Option 4 – 4UA (N, E, M, W)

Unitarisation costs

- Analysis undertaken by PwC shows that the establishment of four unitary authorities would generate initial transition costs of £54.7m.
- PwC calculated a recurring annual cost of £40m, and a gross annual benefit of £34.7m. This results in a recurring net annual cost of unitarisation of £5.4m.
- It is important to note that the figures outlined above are consistent across all of the four unitary models, irrespective of the different geographical configurations.
- Similarly, there is no payback period for any of the four unitary models – i.e. the unitary authorities would never return to a breakeven point.

Council tax harmonisation

- The new unitary authorities will need to decide the council tax rate at which they harmonise. This will be at a point between the highest rate of council tax among the constituent authorities and the lowest rate. The table below sets out three scenarios on what the annual council tax for a Band D property could be in the new unitary authorities after harmonisation (based on current rates):

Council tax harmonisation	Low point	Average point	High point
North Kent	£1,754.69	£1,783.41	£1,841.85
East Kent	£1,825.20	£1,863.45	£1,906.78
Mid Kent	£1,798.78	£1,845.13	£1,903.77
West Kent	£1,815.99	£1,840.52	£1,854.54
Balance ratio	1.04	1.04	1.04

- These rates are relatively equitable with ratios of 1.04 between the rates in East Kent and North Kent.
- There will inevitably be residents who will have to pay more or less than their current rate of council tax if harmonising at these average rates. If harmonising at the average rate, residents in Ashford would see the biggest council tax increase of £46.35, while residents in Maidstone would see the biggest council tax decrease of £58.64.
- Overall, when harmonising at the average rate within this 4UA model, 46% of residents would be paying more council tax and 54% would be paying less council tax. Within the North Kent authority 54% would pay more council tax, in the East Kent authority 52% would pay more, in the Mid Kent authority 42% would pay more, and in the West Kent authority 31% would pay more.
- At the average rate of harmonisation, the overall tax yield is relatively even across the four unitaries, with a discrepancy of approximately £54m (19%) between the highest (East Kent) and lowest (West Kent). Inclusion of Maidstone in the Mid Kent unitary contributes to the improved financial viability of this authority and mitigates undue advantage that exists in the other four unitary models.

- However, when looking at average tax yield per resident, the disparity between North Kent (£589) and West Kent (£767) becomes even wider (£178) compared to the other 4UA options. This is a percentage difference of 30% and a balance ratio of 1.30. This is because, with Maidstone joining Mid Kent, the most affluent districts (Sevenoaks, Tonbridge and Malling, and Tunbridge Wells) are grouped together in a single authority.

Unitary authority	Overall tax yield	Tax yield per resident
North Kent	£299.5m	£589
East Kent	£338m	£642
Mid Kent	£311m	£660
West Kent	£284m	£767
Balance ratio	1.19	1.30

- KCC Finance team modelled the ‘year 1’ council tax yield following harmonisation. If harmonising high, the overall council tax yield in this 4UA model would be £29.7m higher than the baseline, and if harmonising low the overall council tax yield would be £23.3m lower than the baseline. The potential financial gains and losses in the 4UA models are lower than in the other models.

Transition and Disaggregation

Newton modelling of disaggregation costs

- Newton modelled the costs of disaggregating people-based services – Adult Social Care, Children’s Social Care, and services for children with SEND – using data provided to them by KCC. In this 4UA model, the total additional cost for people-based services after disaggregation (for 2025) is £19m, which is a 1.27% increase against the baseline (the current figure is £1.5bn).
- Across the Kent and Medway area, this equates to a spend of £767 per resident. However, the costs of people-based services are not spread evenly. There would be particular pressure on the East Kent unitary authority which would have a spend of £928 per resident – an increase of 21.1% against the baseline. The North Kent unitary authority would have a spend of £730 per resident which is a decrease of 4.9% against the baseline; the Mid Kent unitary authority would have a spend of £736 which is a decrease of 4% against the baseline; and the West Kent unitary authority would have a spend of £670 which is a decrease of 12.6% against the baseline.
 - The difference between the highest spend per resident in East Kent compared to the lowest spend per resident in West Kent is £258
 - The ratio between East and West Kent is 1.39
 - The percentage difference is 38.5%

KCC analysis of disaggregation costs

- Internal KCC analysis of the ‘legacy costs’ of Adult Social Care ‘Community Teams’ (covering the KCC area only) shows the same overall pattern, with the East Kent unitary authority inheriting the highest costs per resident. The cost per resident in the East Kent unitary authority would be £438, in the Mid Kent unitary authority it would be £271, in the North Kent unitary authority it would be £216 and in the West Kent unitary authority it would be £302. This is a balance ratio of 2.02 which is high compared to other options. Again, this can largely be explained by the much higher than average (£325) costs per resident in Dover (£471) and Folkestone and Hythe (£623) districts. The reason these districts have the highest spend is because they provide a high proportion of the county’s care for vulnerable adults.

- This model results in the widest disparity between the highest and lowest spend per resident when compared against the other 4UA options. This is because under this configuration, Folkestone and Hythe and Dover are grouped together in East Kent, whilst Maidstone joins Mid Kent, therefore lowering West Kent's spend per resident and exacerbating the disparity.
- Internal KCC analysis of the legacy costs of Children's Social Services (CSC) and Home to School Transport (HTST) show similar patterns with the highest spend in the East Kent unitary authority. For CSC, in the East Kent unitary authority the cost per resident would be £160, followed by £134 in the North Kent unitary authority, £126 in the Mid Kent unitary authority and £76 in the West Kent unitary authority. This is a balance ratio of 2.11.
- For HTST, the costs are more balanced at £52 per resident in Mid Kent, £47 per resident in West Kent, £46 in North Kent and £38 in East Kent. This is a balance ratio of 1.37. The difference between the highest and lowest HTST costs are highest in this model, both overall (i.e. when compared against the 1, 2 and 3UA options) and also when compared against the other 4UA options.
- Overall, when considering the higher spend per resident on people-based services and the lower tax yield per resident in East Kent, it is likely that there will be significant spending pressures to meet statutory obligations in this particular authority.

Debt and reserves

- Internal KCC analysis of the amount of debt and reserves held by councils across Kent and Medway shows a disparity between the West Kent unitary authority, which will inherit low levels of debt, and the other unitary authorities, which will inherit higher levels of debt.
- Please note that the combined figures presented in the table below do not include the debt and reserves held by KCC. As part of LGR negotiations, these would need to be distributed across the new unitary authorities fairly to support their financial viability. The figures presented under the 'combined' heading are for the councils (i.e. the districts and Medway) that would be the constituent members of the potential new unitary authorities.

Unitary authority	Combined reserves	Combined debt	Level of debt per £1 in reserves	Reserves to debt %
North Kent	£123.5m	£714.2m	£5.78	20.58%
East Kent	£118.6m	£439.9	£3.71	31.62%
Mid Kent	£94.6m	£311.7m	£3.30	34.08%
West Kent	£76.8m	£14.3m	£0.19	69.15%
KCC (to be distributed)	£357.6m	£934.5m	£2.61	38.3%

- This is the least equitable option (both overall and when compared against the other 4UA models), with West Kent inheriting even lower levels of debt (£0.19 for every £1 in reserves). This is because Maidstone joins Mid Kent, leaving just Sevenoaks, Tonbridge & Malling and Tunbridge Wells in West Kent, who all have very low levels of debt.

Option 5 – 2UA

Unitarisation costs

- The PwC analysis of the initial costs of unitarisation in a 2UA model found a ‘one-off transition cost’ of £25.8m.
- PwC calculated a recurring annual cost of £24.1m, and a gross annual benefit of £40.6m. This gives a recurring annual benefit of unitarisation of £16.5m.
- Taking into account the initial cost, the ‘payback’ period of unitarisation would be 3.8 years and there would be £102.6m net benefit after 10 years. This is sooner and a significantly higher net benefit in comparison to the 3UA model and the 4UA models (which never achieve payback).

Council tax harmonisation

- The new unitary authorities will need to decide the council tax rate at which they harmonise. This will be at a point between the highest rate of council tax among the constituent authorities and the lowest rate. The table below sets out three scenarios on what the annual council tax for a Band D property could be in the new unitary authorities after harmonisation (based on current rates):

Council tax harmonisation	Low point	Average point	High point
East Kent	£1,798.78	£1,842.70	£1,906.78
West Kent	£1,754.69	£1,827.01	£1,903.77
Balance ratio	1.03	1.00	1.00

- These rates are very close with a difference of £44 between the two authorities at the low point, £16 at the average point, and £3 at the high point. This model results in the most equitable split of council tax rates between unitaries across all of the different options (bar the single unitary option).
- The 2UA model leads to some of the largest changes for residents if set at these levels. Residents in Medway would see their council tax increase by £72.32 and residents in Maidstone would see their council tax decrease by £76.76.
- Overall, when harmonising at the average rate within the 2UA model, 48% of residents would be paying more council tax and 54% would be paying less council tax. Within the West Kent authority 46% would pay more council tax, and in the East Kent authority 50% would pay more.
- At the average rate of harmonisation, the overall tax yield of the new unitary authorities would be less equal than in the 3UA model. As set out in the table below, the East Kent unitary authority would raise £518m compared to £713m in West Kent - this is an overall difference of £195m, a percentage difference of 38%, and a balance ratio of 1.38. These figures are approximately in line with the PwC analysis of council tax receipts which also showed a large difference between the unitary authorities.
- This difference can largely be explained by population size. When looking at the tax yield per resident, the differences between the unitary authorities are smaller, with £635 per resident in

East Kent compared to £673 in West Kent. This is a percentage difference of 6% and a balance ratio of 1.06.

Unitary authority	Overall tax yield	Tax yield per resident
West Kent	£713.3m	£673
East Kent	£518.4m	£635
Balance ratio	1.38	1.06

- KCC Finance team modelled the ‘year 1’ council tax yield following harmonisation. If harmonising high, the overall council tax yield in the 2UA model would be £48m higher than the baseline, and if harmonising low the overall council tax yield would be £40.6m lower than the baseline. The potential financial gains and losses in the 2UA model are greater than in the 3UA and 4UA models.

Transition and Disaggregation

Newton analysis of disaggregation costs

- Based on Newton’s modelling of the costs of disaggregating people-based services – Adult Social Care, Children’s Social Care, and services for children with SEND the additional cost after disaggregation (for 2025) would be £4.9m, which is a less than a 1% increase against the baseline (the current figure is £1.5bn).
- Across the Kent and Medway area, this equates to a spend of £767 per resident. The costs of people-based services are not spread evenly but they are more equal than in the 3UA model. In the East Kent unitary authority, the spend per resident would be £853 which is an increase of 11.2% against the baseline; and the West Kent unitary authority would have a spend of £704 which is a decrease of 8.3% against the baseline.
 - The difference between the spend per resident in East Kent compared to the spend per resident in West Kent is £149
 - The ratio between East and West Kent is 1.21
 - The percentage difference is 21.2%
- The overall disaggregation costs for people-based services in the 2UA model are lower than in the 3UA or any of the 4UA models, but are higher than in the 1UA models.

KCC analysis of disaggregation costs

- Internal KCC analysis of the ‘legacy costs’ of Adult Social Care ‘Community Teams’ (covering the KCC area only) shows the same overall pattern, with the East Kent unitary authority inheriting highest costs per resident. To a large extent, this can be explained by the much higher than average (£325) costs per resident in Folkestone and Hythe (£623) and Dover (£471) districts. The reason these districts have the highest spend is because they provide a high proportion of the county’s care for vulnerable adults. The cost per resident in the East Kent unitary authority would be £379, and the cost per resident in the West Kent unitary authority would be £269. This is a balance ratio of 1.41 which is the lowest of all the options. In comparison to 3UA or 4UA models, the difference between unitary authorities is more balanced due to the costs being spread over a larger authority.
- Internal KCC analysis of the legacy costs of Children’s Social Services (CSC) and Home to School Transport (HTST) show similar patterns with the highest spend in the East Kent unitary authority.

For CSC, the East Kent unitary authority the cost per resident we would be £158 and in West Kent it would be lower at £95 per resident. This is a balance ratio of 1.66.

- For HTST the costs are far more balanced at £47 in West Kent and £44 in East Kent. This is a balance ratio of 1.07.
- When considering the higher spend per resident on people-based services, and the lower tax yield per resident in East Kent, it is likely that there will be significant spending pressures to meet statutory obligations in this authority in particular.

Debt and reserves

- Medway and Gravesham both hold high levels of debt compared to their reserves, at £14.15 and £10.50 debt per £1 in reserves respectively. And Sevenoaks, Tonbridge and Malling, and Tunbridge Wells all have very low levels of debt. Unlike in the 3UA and 4UA models, all of these areas are included together within the same unitary authority. This has the effect of balancing out the overall figure and means that there is greater equity between the councils in terms of debt and reserves – while this might be seen as advantageous for the districts with high levels of debt, it would likely be seen unfavourably within the districts with low levels of debt.
- Please note that the combined figures presented in the table below do not include the debt and reserves held by KCC. As part of LGR negotiations, these would need to be distributed across the new unitary authorities fairly to support their financial viability. The figures presented under the ‘combined’ heading are for the councils (i.e. the districts and Medway) that would be the constituent members of the potential new unitary authorities.

Unitary authority	Combined reserves	Combined debt	Level of debt per £1 in reserves	Reserves to debt %
West Kent	£239.1m	£774.4m	£3.24	33.61%
East Kent	£174.5m	£705.6m	£4.04	30.2%
KCC (to be distributed)	£357.6m	£934.5m	£2.61	38.3%

Option 6 – 1UA (benchmark)

Much of the analysis presented for the other models, particularly relating to balance analysis and differences between unitary authorities, does not apply to the single unitary model. However, there are still a number of indicators upon which to assess the 1UA model. It is important to note that the 1UA model has been used as a 'benchmark' from which to compare the other models - whilst there is a strong financial case for a single unitary, it is not necessarily a genuinely viable option due to limitations around population size, practical service delivery and devolution arrangements.

Unitarisation costs

- The PwC analysis of the initial costs of unitarisation for the 1UA model found a 'one-off transition cost' of £23.2m.
- PwC calculated that there would be no recurring annual cost, and that there would be a gross annual benefit of £49.4m.
- Taking into account the initial cost, the 'payback' from unitarisation would be achieved within a year and there would be a £426.6m net benefit after 10 years. This is the quickest payback period and the highest net benefit of all the options.

Council tax harmonisation

- The new unitary authority will need to decide the council tax rate at which it harmonises. This will be at a point between the highest rate of council tax among the constituent authorities and the lowest rate. The table below sets out three scenarios on what the annual council tax for a Band D property could be in the new unitary authorities after harmonisation (based on current rates):

Council tax harmonisation	Low point	Average point	High point
Single unitary covering Kent and Medway	£1,754.69	£1,837.10	£1,906.78

- Medway currently has the lowest Band D rate of council tax at £1,754.69 (low point) whilst Folkestone and Hythe has the highest rate at £1,906.78 (high point).
- With council tax set at the average rate, residents in six of the 13 constituent areas would see their council tax rise. This highest increase would be in Medway which would see an increase of £82.41. Residents in Folkestone and Hythe would see the biggest decrease of £69.68.
- Overall, when harmonising at the average rate within the 1UA model, 48% of residents would be paying more council tax and 52% would be paying less council tax.
- At the average rate of harmonisation, the overall tax yield for the new unitary authority would be £1.23bn which is line with other models.
- KCC Finance team modelled the 'year 1' council tax yield following harmonisation. If harmonising high, the overall council tax yield in the 1UA model would be £49.2m higher than the baseline, and if harmonising low the overall council tax yield would be £53m lower than the baseline. Compared to the 2UA model, the potential financial gains from harmonising high in the 1UA

model are minimal (circa £1.2m difference) but the potential financial losses are significant (circa £12.4m difference).

Transition and Disaggregation

- Based on Newton's modelling of the costs of disaggregating people-based services – Adult Social Care, Children's Social Care, and services for children with SEND – the costs after disaggregation (for 2025) would be £16.2m lower which is a 1% decrease against the baseline (the current figure is £1.5bn).
- Across the Kent and Medway area, this equates to a spend of £759 per resident.
- This is the only model in which disaggregation of people-based services has a financial gain.
- Internal KCC analysis of the 'legacy costs' of Adult Social Care 'Community Teams' (covering the KCC area only) shows an average spend of £325 per resident. The cost per resident for Children's social care was £127 and £45 for Home to School Transport. The 1UA model is the only model in which these costs would be distributed across the entire area, which mitigates the impact of the particularly high costs of residential care in Folkestone and Hythe and Dover.

Debt and reserves

- As the whole Kent and Medway area is covered by a single authority, the 1UA model is the only model in which KCC's reserves and debt could be straightforwardly transferred to the new unitary authority. In the table below, the figures have been divided so that the districts and Medway are presented separately to KCC, and overall figures show the level of debt and reserves the new unitary authority would inherit.

Unitary authority	Combined reserves	Combined debt	Level of debt per £1 in reserves	Reserves to debt %
Kent districts and Medway	£413.6m	£1480.0m	£3.58	27.9%
KCC	£357.6m	£934.5m	£2.61	38.3%
Overall	£771.2m	£2414.5m	£3.13	31.9%

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Engagement assessment

Contents

Background.....	1
Relationship with the Council	1
Areas of interest to residents.....	3
Views on council tax and financial efficiency	5
Appetite for innovation in service delivery.....	7
Interest in local democracy and decision making.....	8
Partners position	9
Summary and impact on options	10
Conclusions.....	10

Background

This report supplies evidence to aid the drafting of the LGR options appraisal. This was a desk-based exercise using existing local and national information. Attitudes to the different options have been extrapolated from these findings but cannot replace direct engagement and consultation on the future shape of Kent and Medway Councils. Conclusions from this report must be caveated given no engagement has yet taken place.

This analysis includes information collected from Kent based sources, learning from other local authority areas, and reports which give a national perspective on awareness and perceptions of LGR or council services more broadly, across residents and service users. Many sources span a number of focus areas (so are referenced more than once).

Relationship with the Council

Research commissioned by KCC in 2023 to understand the different relationships Kent residents have with the Council found that in the main:

- knowledge about local government structures is low, including what services are provided. Little thought is given by many participants within this research to the tier structure.
- many assume that KCC acts as an umbrella organisation for smaller district councils or that KCC is closer to central government.
- there is little appetite to learn more about the structure of local government. A small number of participants acknowledge that information is likely to be readily available but have little desire to seek this out.
- for many participants, KCC feels like a distant organisation that they have a transactional relationship with. For most, KCC is functioning well in the background, and they are therefore satisfied with how things are run.

- participants who rely more heavily on KCC services and those who work adjacent to KCC in a professional capacity are more likely to feel they have a deeper relationship with the council due to higher levels of engagement.
- a smaller number of participants reference perceived differences in funding and resource allocation between East and West Kent. East Kent is viewed as receiving less resource and being more deprived than other, wealthier parts of West Kent¹.

This research tested the following descriptors. The italics show the expectations of respondents.

- Timeliness - *receiving quick responses and updates, so minimal time is wasted interacting with KCC or chasing/following up.*
- Reliability - *doing what you say you will when you say you'll do it.*
- Effectiveness - *a council that delivers value for money and implements services that work for everyone.*
- Approachable - *residents want to be able to get in touch with KCC easily, but sometimes they see the council as a faceless corporation.*
- Inclusivity - *not being discriminatory, accessible services and including residents in decisions.*
- Compassion - *residents want KCC to show compassion and take account of their personal circumstances when it matters.*².

The research found that people who use services more intensively (such as social care) have a closer relationship with the council than those who don't view themselves as service users. There may be a more emotional response linked to the experience of a particular service. This could be good or bad³.

Ethnographic work by the LGA (May 22) which looked at what makes people connected to where they live, included a Margate case study. This supports findings by the resident engagement work and found:

- people have low levels of interest in the council.
- if you are experiencing a personal problem which interacts with the council then interest is increased.
- for some there is suspicion of the council, or politicians more generally.
- the council is easily blamed for things done badly and does not always get the credit for positive changes.
- if necessary conditions are not met, the council is viewed negatively, within this research this included around:
 - lack of council support with housing,
 - support to help access to work
 - local amenities.⁴

¹ BritainThinks (2023) (Commissioned Research for KCC by MRX) Resident and user experience research (not published)

² ibid

³ ibid

⁴ Local Government Association (May 22) 'What makes people feel contented where they live, and what makes people deep-rooted and proud?' Place and Identity Research, LGA, Neighbourly Lab, 16May22 compressed.pdf (p.21/22)

National research⁵ by LGiU confirms that while knowledge of local government is limited, local government is typically more trusted than central government. Knowledge of devolution is low.

This report suggests that a greater proportion support a two-tier model at 38% asked, (defined as ‘a combination of both districts and county councils responsible for different services in a local area’) than a single unitary authority (26%), defined as responsible for all services in a local area. 15% of respondents felt that it made no difference and 22% said they didn’t know.

Directly elected Mayors are perceived broadly as positive as this is seen as giving greater accountability, community cohesion, and increasing interest in local government.

Local community groups receive credit for improvements but limited blame for perceived worsening of service quality.⁶

Resident engagement conducted to understand perceptions of LGR: Somerset

Ipsos MORI carried out 2,049 telephone interviews across Somerset. Quotas were used for gender, age and work status. A minimum of 500 interviews were completed in each of the four Somerset district council areas. The report includes the following:

‘Somerset residents showed higher levels of satisfaction with their district council than they did with Somerset County Council. Two-thirds (67%) said that they were satisfied with their district council (15% dissatisfied) compared with 45% who were satisfied with the county council (31% dissatisfied).’ (2021:2)

This may support the hypothesis that people are more likely to be dissatisfied with structures which feel further away.

The report also found significant support for devolution and localism.

‘When it comes to support for the principles of devolution and localism, residents were very much in favour of these principles. Two-thirds (66%) said they supported devolution (in line with both national and local polling) while 71% said they support localism’ (2021:2)⁷

Areas of interest to residents

Within KCC’s Budget consultation over half of respondents were not comfortable with spending reductions in Children’s Social Care, Highways, Adults and Older People, Schools’ Services and Children’s Other Services.

Respondents placed highest priority in investing their final £1 left to spend in Children’s Social Care and Adults Social Care (both 18.7%), closely followed by Highways (17%).

⁵ State of the Locals 2025, State of the Locals 2025 - LGiU

⁶ Ibid.

⁷ Ipsos MORI (2021) ‘Survey of Somerset residents on local government reorganisation’ accessed [*Microsoft Word - 20-073479-01 Stronger Somerset Report V3 PUBLIC.docx](#)

Less than 1% of respondents placed highest priority in investing their final £1 left to spend in management, support and overheads or costs of running or operational premises⁸.

T200 staff event (July 24) on the budget:

This internal Budget consultation event found:

- while staff prioritised Adult Social Care (27%) and Children Young People and Education (22%), highways was a lower priority than for residents (10%).

The Tunbridge Wells Resident Survey⁹ suggests high satisfaction for parks and open space, with lowest levels of satisfaction being with roads and public rights of way, parking and council tax.

KCC's Community Services consultation in 2023 suggested that people want services which can be accessed easily. There are polarising views around developing/maintaining services where people have higher levels of need:

- 44% of all respondents answering indicated they agree with designing the proposals by looking at where people have the highest need for services (15% indicated they strongly agree).
- 42% of all consultees answering indicated they disagree with this approach (26% indicated they strongly disagree). More women (and those who were pregnant or had children) disagreed compared to men¹⁰.

Given this consultation was linked to access to family services, the gender disparity would suggest that primary carers view their access as the dominant priority, whereas people who are less likely to use services would see 'need' as a dominant factor. 'Need' here is defined as financial but potentially the interpretation could be much broader (mental and physical health, isolation etc).

The Community Warden service consulted on a redesign in 2023/24. Within this consultation there was strong support for community-based services (93% agree – with 86% strongly agreeing), with significant support for a ward-based model¹¹. This may suggest resident preference for locally delivered services.

KCC compliments data includes the following themes:

- staff helpfulness and friendliness.
- positive service experiences – services which are efficient, clean, well-organised, ease of booking.

⁸ KCC Budget Consultation 2025-2026, Consultation Report, October 2024. [Budget Consultation 2025-26 Report](#)

⁹ Tunbridge Wells Borough Council 'Residents' Survey results 2023' [Residents' Survey results 2023](#)

¹⁰ Community Services Consultation (Dec 2023) <https://letstalk.kent.gov.uk/community-services-consultation>

¹¹ KCC & Lake Market Research (2024) 'Community Warden Service Review, Consultation Report' <https://letstalk.kent.gov.uk/community-warden-service>

- empathy, understanding and dedication shown by staff, especially when helping them to navigate a challenging situation.¹²

KCC complaints data shows the following areas of concern:

- transport and bus links.
- better communication.
- service quality and improvement.
- road works and traffic management.

Surrey Council tested broad questions around devolution and local government re-organisation with their resident's panel of around 1,400 people. Results were weighted to be representative of the Surrey population.

Between the 12 – 26 February 2025, 558 residents gave their thoughts and preferred outcomes on LGR.

- Residents were asked if they had preference for a 1, 2 or 3 unitary model without additional context. Results showed no clear preference.
- Respondents were asked what their preference of outcome would be for unitarisation. The top three responses were:
 - better value for money (60%)
 - clearer accountability (45%)
 - creating a more financially resilient Council (37%)¹³

Views on council tax and financial efficiency

Responses to the KCC Budget consultation shows:

- some support for increasing council tax, 66% supported an increase in council tax – (52% up to the maximum).
- respondents believe there are opportunities to make savings through wages, pensions, expenses, operational efficiencies and better value for money.
- there is a wish to maintain standards and to reduce inefficiencies.¹⁴

The KCC Budget consultation also found respondents:

- supported more joint working with partners (92%),
- supported more services being made available online as standard (67%)
- supported charging service users for non-statutory services (60%).
- low support for reducing statutory services to the core minimum (33%).¹⁵

¹² [Complaints - Oct to Dec 24.docx](#) Not published

¹³ Surrey County Council (2025) Audit and Governance Committee
<https://mycouncil.surreycc.gov.uk/documents/s102970/Item%204a%20-%20Member%20Questions%20and%20Responses.pdf>

¹⁴ KCC Budget Consultations (24/25 & 25/26) [Budget Consultation 2025-26 | Let's talk Kent](#)

¹⁵ KCC Budget Consultations (24/25 & 25/26) [Budget Consultation 2025-26 | Let's talk Kent](#)

T200 staff event (July 24) on the budget found:

- staff showed a similar level of support to the public consultation for an increase in council tax to maximum (61%), (32% against).
- high support was given to saving money by working with partners in a more joined up way (89%).
- significant support for charging for non-statutory use of services (53%).
- lower (than the public) for saving the council money by putting more online (44%)
- low support for reducing statutory services to a core minimum (16%).

National data from LGA (polling on resident satisfaction) suggests that while 56% of respondents are very or fairly satisfied with the way their local council runs things, only 40% strongly or tend to agree that their council provides value for money. 31% neither agree or disagree¹⁶.

Tunbridge Wells Resident's survey suggests high dissatisfaction with council tax.¹⁷

Research commissioned by KCC in 2023 to understand the different relationships Kent residents have with the Council found that some residents would like to know more about where their council tax goes and how else the council is funded. Council tax is seen by some as a 'fact of life' but many would like to see something in return¹⁸.

Financial assessments to support KCC's draft options appraisal have shown:

- Option 1 (3 unitaries) - 50% of residents would pay more Council Tax, and 50% would pay less.
- Option 2 (4 unitaries) - 57% of residents would pay more Council Tax.
- Option 3 (4 unitaries) - 65% of residents would pay more Council Tax.
- Option 4 (4 unitaries) - 50% of residents would pay more Council Tax, and 50% would pay less.
- Option 5 (2 unitaries) - This is the only option where less than half of residents would pay more Council Tax (48%) which might make it slightly better supported
- Option 6 (1 unitary - benchmark) – information was not available at the time of writing.

A survey completed in Wales in 2024 on public attitudes to council tax focused on fairness of the council tax system (design, administration and the way it is used and invested into communities). This research found that:

¹⁶ LGA (2023) Polling on resident satisfaction with councils: round 36

<https://www.local.gov.uk/sites/default/files/documents/Resident%20Satisfaction%20Polling%20Round%2036%20JH%20accessibility%20edits.pdf#:~:text=56%20per%20cent%20of%20respondents%20are%20'very,31%20per%20cent%20neither%20agree%20nor%20disagree.>

¹⁷ Tunbridge Wells Borough Council (2023) Residents' Survey results 2023 [Residents' Survey results 2023](#)

¹⁸ BritainThinks (2023) (Commissioned Research for KCC by MRX) Resident and user experience research (not published)

- around two-thirds of respondents (61%) reported that it was not clear to them how council tax is spent.
- when asked to name services supported by council tax, respondents listed bin and refuse collection (50%), Police (42%), road maintenance (31%).
- around two thirds of respondents (65%) disagreed that they had seen the benefit of council tax invested in their local community.
- around three out of five respondents (61%) disagreed with the statement that the council tax system is fair.
- responses were equally divided in terms of whether local councils do not have enough control over council tax rates, with 41% disagreeing, and 27% answering, 'don't know'.
- around three out of every five respondents (63%) indicated that their council tax was 'too high'. Before additional information was given around a quarter (24%) of respondents indicated that the amount of council tax they are expected to pay was 'about right'¹⁹.
- after being provided with information about the services which are funded by council tax, a smaller proportion indicated that the council tax they are asked to pay was too high (54% compared to 63% before the information was provided). A larger proportion of respondents indicated that the amount they are expected to pay was about right (29%, compared to 24% before the information was provided).

The KCC Budget consultation shows that 60% of people were in favour of charging service users for non-statutory services²⁰. In the Tunbridge Wells Resident survey 42%, when asked how to balance the budget, suggested charging those who use services²¹.

Appetite for innovation in service delivery

National research from the Department for Science, Innovation and Technology focused on public attitudes and the use of Artificial Intelligence (AI) suggests improved public trust and optimism about data practices through AI use²², but also some concerns expressed around further use of data and accountability including anxiety around data security, and lack of control of information.

This national research suggests that while awareness around AI is increasing, age significantly impacts understanding, with younger people, those living in and around London, and higher socioeconomic groups reporting higher familiarity. Almost half of people surveyed think that AI is already used by public services²³. There is optimism about the use of AI in areas such as healthcare to support service provision.

¹⁹ Welsh Government (2024) Survey of public attitudes to council tax, 2024: summary. [Survey of public attitudes to council tax, 2024: summary \[HTML\] | GOV.WALES](#)

²⁰ KCC Budget Consultations (24/25 & 25/26) [Budget Consultation 2025-26 | Let's talk Kent](#)

²¹ Tunbridge Wells Borough Council (2023) Residents' Survey results 2023 [Residents' Survey results 2023](#)

²² Gov UK (2024) Public attitudes to data and AI: tracker survey (wave 4) report [Public attitudes to data and AI: Tracker survey \(Wave 4\) report - GOV.UK](#)

²³ [ibid](#)

An LGA survey which explored current local government use of AI found that it was being used in areas such as HR, administration (minutes), procurement, finance, cyber security with limited use in health and social care.²⁴

In a study published in Government Information Quarterly (March 2024) Haesevoets et al looked at the findings of three studies which explored UK respondents' perception of AI usage in government and found that:

- people prefer AI to have less decisional weight than human decision makers.
- people prefer AI to provide input and advice to decision makers but not make decisions.²⁵

In relation to increasing use of digital, Maidstone's citizen engagement found high levels of confidence using digital channels, with slightly lower levels of confidence using web chat (74%) and controlling social media privacy (69%)²⁶.

The KCC Community Services consultation found that:

- 64% of people feel confident about accessing services digitally.
- 10% were not confident with technology.
- 16% felt that online access to services is not an inclusive approach particularly for the elderly.

Responses highlight that it is important to have an option for face-to-face delivery and that the most important aspect of use was ease.²⁷

KCC resident research suggests that residents are generally satisfied with KCC services being delivered digitally if possible, however they stress the importance of flexibility to ensure services remain accessible. While 'functional' services are seen as more easily digitalised, more 'emotive' service experiences are felt to be better delivered through face-to-face interaction with the assumption that any difficulties are more quickly and empathetically managed.²⁸

Interest in local democracy and decision making

National research by LGiU shows there is strong public consensus that residents should have a say in decision making, with 81% of people asked, saying that local residents should always have a say about decisions that impact their local area²⁹. When asked whose views are the most important for local areas, respondents identified the voices of local residents and councillors. However, 56% suggest it doesn't matter who or where decisions are made, as long as they are

²⁴ [Local Government Association, \(2024\) 'Local government: State of the sector: AI'](https://www.local.gov.uk/sites/default/files/documents/Local%20Government%20State%20of%20the%20Sector%20AI%20Research%20Report%202024%20-%20UPDATED%203.pdf)
<https://www.local.gov.uk/sites/default/files/documents/Local%20Government%20State%20of%20the%20Sector%20AI%20Research%20Report%202024%20-%20UPDATED%203.pdf>

²⁵ Haesevoets et al, March 2024) Government Information Quarterly (Vol 41, Issue 1) 'How do citizens perceive the use of Artificial Intelligence in public sector decisions?'
<https://www.sciencedirect.com/science/article/abs/pii/S0740624X23001065>

²⁶ [Resident survey data - Maidstone Borough Council](#)

²⁷ KCC & Lake Market Research (2024) 'Community Warden Service Review, Consultation Report'
<https://letstalk.kent.gov.uk/community-warden-service>

²⁸ BritainThinks (2023) (Commissioned Research for KCC by MRX) Resident and user experience research [KCC Resident user and experience research summary narrative report June 2023 FINAL](#) (not published)

²⁹ State of the Locals 2025, [State of the Locals 2025 - LGiU](#)

the right decisions³⁰. 54% agreed that too many policy decisions affecting their local area were made outside of it.

Awareness of the precise role of local government officials is low, with levels of understanding of the work and decisions taken by councils and councillors being below that of Westminster MPs. At both levels of governance, the majority of respondents indicated that they had limited knowledge of the activity of elected representatives. 64% said they knew not very much/nothing at all about the work of their local councillors. 63% said they knew not very much or nothing at all about how decisions were made in their local council³¹.

Maidstone citizen engagement shows that 87% of residents are interested in what happens in their neighbourhood, and 51.2% feel part of the neighbourhood. Only 4% definitely agreed that they could influence decisions affecting their local area (21.11% tended to agree), but 37.38% disagreed, suggesting that many don't feel able to influence local decision making³².

However, looking at election turn out results, district turn out is not significantly different from county level numbers. The most recent county election saw a turnout of 33.4% (May 25)³³ and district turn out in May 2023 shows similar figures, such as 27.79% in Dartford³⁴, 36.6% in Tonbridge and Malling³⁵ and 34.87% in Folkestone and Hythe³⁶ (May 2023). Local evidence would suggest that people do not seem to be more inclined to vote at a more local level.

Partners position

To inform the submission of the Interim Plan for local government reorganisation to Government in March 2025, Kent Leaders and Chief Executives asked partners their views. No geographical breakdowns were provided at this point, although the possibility of 3 or 4 unitary councils was referenced.

Partner indications given at that time are below but may have changed subsequently and may change in the future.

NHS	Would support a 3 unitary model to minimise infrastructure costs and reduce risk of service fragmentation.
Kent Fire and Rescue	Supports 3 unitary model
OPCC	Supports 3 unitary model
Housing authority feedback	Town and County Housing - Supports 3 unitary model
Further Education	Kent Further Education – support 4 unitaries aligned to health trusts East Kent College Group – suggests East Kent as Canterbury, Dover, Folkestone, Swale and Thanet.

³⁰ State of the Locals 2025, [State of the Locals 2025 - LGiU](#)

³¹ State of the Locals 2025, [State of the Locals 2025 - LGiU](#)

³² Maidstone Borough Council (2022) [Resident survey data - Maidstone Borough Council](#)

³³ The Electoral Commission (2025) [Report on the May 2025 local elections in England | Electoral Commission](#) under supporting data 'May 2025, electoral data

³⁴ Dartford Borough Council Election results – May 2023 dartford.moderngov.co.uk/mgElectionResults.aspx?ID=55&RPID=75265883

³⁵ Tonbridge and Malling Borough Council Election results – May 2023 [Election results by party, 4 May 2023](#)

³⁶ Folkestone and Hythe District Council Election Results – May 2023 (Average of Ward Turnout) - [District council 2023 election results | Folkestone & Hythe District Council](#)

Summary and impact on options

Before engaging residents and partners, it is difficult to draw conclusions on local views and this information will need to be re-visited after any engagement takes place.

Information collected within this report suggests that:

1. there may be low levels of interest in local government by many, and some confusion around government structures, as well as the services delivered by different tiers of government.
2. tier one structures can be perceived as further from the resident than tier two, or community groups.
3. services which are perceived as geographically closer to residents seem to have greater levels of trust (county greater than national, district greater than county, high trust of community groups).
4. other areas have seen some resident support for devolution and localism.
5. residents and staff responding to the Budget consultation prioritised funding for social care, and (for residents) highways, infrastructure and road networks. There is low support for costs around overheads and management, but there is significant support for partnership working and some support for digital innovation.
6. local access to services is important to residents, with people valuing services at a community level.
7. in a neighbouring authority, better value for money, accountability and financial resilience were seen as key outcomes of unitarisation.
8. within the Budget consultation there was some support for increases in council tax (52% to the maximum and 66% supporting some increase to fund services). Other research suggests some residents would like to know more about how council tax might benefit them, and national data suggests that only 40% of respondents felt that councils provide good value for money.
9. there may be some support for charging for non-statutory services.
10. people may support access to services digitally where possible, and potential innovations through AI (where decisions are not being made).
11. residents may like to be further involved in decision making; however, many feel they do not have influence at a local level. Turn out levels at district and county elections are similar. There is low awareness of the role of local government officials and how decisions are taken.

Conclusions

The below explores how these findings may affect the different geographical options for LGR that are included in the options appraisal.

Option 1 (3 unitaries)

Positives may include:

- increasing perception of 'local'/'community' supports relationship with services.
- this may be a good 'middle ground' of strategic versus local that supports engagement in local decision making and visibility of services and where council tax is spent.
- fewer council boundaries (compared to four-unitaries) mean less complexity for residents to access services and for partners to navigate.

- partners had previously supported this option when asked and this model best matches the operational delivery arrangements for Police.

This option may result in 50% of residents paying more council tax, and 50% paying less. Those paying less may view this change as positive, those paying more may view this change as negative.

Negatives may include:

- East Kent includes areas of higher deprivation levels, and this split may create perceptions of 'unfairness' in relation to services and quality of public space.
- This model is more complex than a 1 or 2 unitary option (low level resident knowledge around local government structure and service delivery).
- Perceived increase of back office, managerial duplication or cost.

Option 2/3/4 (four unitaries)

Positives may include:

- increasing perception of 'local' / 'community' supports relationship with services.
- localised decision making.
- perception that council tax is spent on local provision.

57% of residents would pay more Council Tax for option 2, 65% more for option 3 and 50% for option 4. For those paying higher levels of council tax, this change may be viewed negatively.

Negatives may include:

- there is more fragmentation and the opportunity for strategic planning is reduced.
- more boundaries between unitaries may increase perceived complexity of local government structure and service delivery.
- perceived increase of back office, managerial duplication or cost.
- increased complexity for partners to work with councils across their delivery boundaries.

Option 5 (2 unitaries)

Positives may include:

- efficiency and value for money for residents is higher in the two-unitary option,
- a simplified structure and system (when compared to 3 and 4 unitary options). May increase understandings of local government and service delivery.

This is the only option where less than half of residents would pay more council tax (48%) which might make it slightly better supported.

Negatives may include:

- East and West split may create the perception of 'unfairness' in relation to services and quality of public space.
- potentially reduces ability to see local impact of council tax.
- potentially reduces opportunity for local decision making and delivery of services.

Option 6 (1 unitary - benchmark)

Positives may include:

- a simplified system, may increase resident awareness and understanding.
- potential reduced cost of back office/managerial.
- supports one council tax system.

Negatives may include:

- residents might feel the local authority is too big and remote and would not be able to see where their council tax is being spent.
- potentially reduces the opportunity for local decision making and delivery of services, as this may feel remote, or outside of the community.

Democracy and Local Identity assessment

1) Summary of findings within the agreed areas of focus

The Democracy and Local Identity (DLI) workstream considered the challenges and opportunities of the different proposed models of LGR in Kent and Medway through the themes listed below in order to address the following problem statement:

People are disconnected from council decision-making and place-shaping – how can we enhance this (and not make it worse) through LGR?

- **Identity** – local identities, culture and heritage that need to be considered for LGR
- **How people live their lives** – the way people live and travel in the county area
- **Democracy and representation** – implication of councillor/member numbers, and achieving effective representation
- **Governance and engagement** – implications and opportunities regarding community engagement and neighbourhood empowerment arrangements through LGR and future relationships with VCSE, Parishes and other community partners that comprise civil society.

Our report explores individual categories within these themes and provides a summary of our evidence and conclusions that explains the extent to which each option meets the LGR criteria. Further information about our evidence can be found in the appendices, which are provided in a separate document.

Identity

Summary - For Identity, the workstream has considered the socio-economic factors of deprivation and diversity, and how areas identify as places: the cultural, heritage or geographic factors that give them a local identity. Based on the information gathered for this section it was felt that Option 1 – 3UA would be most reflective of and could potentially boost local identity in the different areas. There were two main factors behind this: firstly, it produces lower levels of deprivation in individual authorities compared to other options; and secondly, because it produces district groupings that felt like a good 'fit' and that align with how other organisations and partnerships organise themselves.

Indicator	Best fit to Government criteria	Explanation
Socio-economic and demographic factors		
Deprivation	Option 1 – 3UA	<p>The 3UA model has a lower disparity between the West and the rest of Kent than the 4UA models and it produces the lowest peak IMD and lowest proportion of most deprived LSOAs in East. Importantly, it separates Swale and Thanet meaning that high deprivation is not concentrated in a single authority.</p> <p>Option 2 – 4UA groups Swale and Thanet in a small unitary authority which creates the highest levels of deprivation.</p> <p>The 2UA model has a lower disparity between the unitary authorities but this is because West becomes relatively more deprived, while East remains just as deprived as in other models.</p>

Ethnicity	No optimal option	No conclusions as to the strength of the options, only that a North unitary in any option (or West in Option 5) would be more ethnically diverse than other parts of the county.
Religion	No optimal option	No conclusions as to the strength of the options, only the conclusion that a North unitary in any option (or West in Option 5) would have more religious diversity than other parts of the county.
Place and identity		
Place	Option 1 – 3UA	<p>In the 3UA model the areas are smaller and therefore closer to residents than in the 2UA model, but are large enough to encompass broader and complementary identities, particularly in grouping coastal communities together and districts spanning the Thames Estuary, which it was felt the 4UA models were unable to do.</p> <p>The 3UA model is more equal in terms of deprivation. Areas of high deprivation, such as is the case with Option 2 – 4UA will likely have significant spending pressures meaning they may have to prioritise resources on statutory services rather than place-making.</p> <p>There is a risk that an overall Kent identity could be undermined in a 2UA model due to a West vs East dynamic.</p>

Socio-economic and demographic factors

Deprivation

The findings in this section are based on an analysis of Index of Multiple Deprivation (IMD) scores for each of the 13 area in Kent and Medway (more detail can be found in Appendix A). The analysis considered two measures of deprivation:

- Average IMD scores - for whole district areas and combinations of districts within proposed unitary authorities. This provided a measure of deprivation **(the higher the score, the higher the level of deprivation)** for whole unitary authority areas which allowed comparisons of different options.
- LSOAs (Lower Super Output Areas i.e. neighbourhoods) in the top 10% most deprived areas in England – this provided information about where the most deprived individual neighbourhoods in Kent are located. These are the neighbourhoods where demand for council services will likely be highest.

Proposed UA	Option 1 – 3UA	Option 2 – 4UA	Option 3 – 4UA	Option 4 – 4UA	Option 5 – 2UA	Option 6 – 1UA
Average IMD						
North	22.8	21.6	21.4	21.4	-	19.8
East	22.6	25.1	23.4	23.4	23.3	
West	13.4	13.4	13.4	12.3	16.8	
Mid	-	-	23.2	20.7	-	
South	-	21.6	-	-	-	
Range (most - least deprived)	9.4	11.7	10.1	11.1	6.5	-

Proposed UA	Number of LSOAs in 10% most deprived in England	Total number of LSOAs	% of LSOAs which are 'most deprived'	% of Kent and Medway's 'most deprived' LSOAs (i.e. /65)
Option 1 – 3UA				
North	33	370	9%	51%
East	30	386	8%	46%
West	2	309	1%	3%
Option 2 – 4UA				
North	17	285	6%	26%
East	36	259	14%	55%
South	10	212	5%	15%
West	2	309	1%	3%
Option 3 – 4 UA				
North	17	285	6%	26%
East	25	241	10%	38%
Mid	21	230	9%	32%
West	2	309	1%	3%
Option 4 – 4UA				
North	17	285	6%	26%
East	29	308	9%	45%
Mid	19	258	7%	29%
West	0	214	0%	0%
Option 5 – 2UA				
East	46	471	10%	71%
West	19	594	3%	29%
Option 6 – 1UA (benchmark)				
Kent & Medway	65	1065	6%	100%

Findings:

- More than half (53%) of Kent and Medway's LSOAs categorised as 'most deprived' are within two districts – Thanet (28%) and Swale (25%). Thanet and Swale are also the most deprived areas by average IMD at 31.3 and 27.1 respectively.
- All of the 4UA models have higher 'peak' IMDs and greater ranges, compared to the 2UA and 3UA models. This means that these options produce unitary authorities which are **more deprived overall** as well as creating wider disparities between unitary authorities.
- In all of the options, there is a disparity between West which has low levels of deprivation on average and very few of the most deprived LSOAs and the other areas.
- The 3UA model produces the least deprived version of an East UA with an average IMD of 22.6 and 8% of LSOAs categorised as most deprived. This is the only option in which East is not the most deprived unitary authority, with North scoring slightly higher. This is because Swale and Thanet are in different unitary authorities.
 - It is the option with the lowest peak IMD score (22.8 in North UA)
 - It is the option with the equal lowest peak percentage of LSOAs categorised as most deprived (9% in North UA)
- Option 2 – 4UA creates an East unitary authority which has an average IMD of 25.1 and where 14% of LSOAs are categorised as most deprived. **This would be the most deprived unitary authority across all of the options.**

- This unitary authority would be made up of Thanet and Swale –the two most deprived districts in the whole Kent and Medway – and Canterbury.
- The 2UA model produces **the lowest disparity between unitary authorities**. However this is because West has a higher IMD than in other options at 16.8, rather than the East unitary authority having a lower IMD which remains at a similarly high score of 23.3. Meaning that with this option, on average, the **West would become more deprived, but the East would not become less deprived**.

Conclusions:

One, two, three or four unitary authorities?

- A 4UA model would produce unitary authorities that were more deprived (than 2UA or a 3UA model) on average, with higher concentrations of acute deprivation and greater disparities between the West and the rest of Kent.
- **Reducing disparity does not necessarily mean reducing deprivation** in the most deprived unitary authority. A 2UA model has the lowest disparity between the West and the East unitary authorities – but this is because West becomes more deprived. Deprivation levels in East remain as high as in other models.
- The 3UA model produces the lowest peak IMD and the lowest peak proportion of most deprived LSOAs (i.e. the most deprived unitary authority is not as deprived as in other models).

District makeup of the unitary authorities

- Grouping Swale and Thanet together would produce a unitary authority with a very high average IMD score and containing more than half of Kent and Medway’s most deprived LSOAs. By doing so, the most significant deprivation would be concentrated alongside potentially high demand upon services and financial pressure within a single unitary authority.

On the basis of the points above, Option 1 – 3UA would be optimal. The disparity between the West and the rest of Kent is slightly lower than for the four unitary models and it produces the lowest peak IMD and proportion of most deprived LSOAs. Importantly, it separates Swale and Thanet meaning that high deprivation is not concentrated in a single authority.

Diversity

The findings in this section are based on the 2021 Census. Data tables are included in Appendix A.

- In 10 of the districts, 82% or more are White British and 89% or more are ethnically White. These figures are higher than the national average.
- In contrast, Dartford and Gravesham have a far more diverse population with approximately a quarter part of a minority ethnic group which is above the national average.
- Within Dartford and Gravesham there are specific communities which are prevalent:
 - In Dartford 9.9% of the population are Asian – with 4.4% of the population Indian
 - In Dartford 10.5% of the population are Black – with 8.4% of the population African
 - In Gravesham 11.2% of the population are Asian – with 7.6% of the population Indian
 - In Gravesham 6.5% of the population are Black – with 4.9% African

- Medway is also more ethnically diverse than other parts of Kent, with 15.7% part of a minority ethnic group. Ashford, Canterbury and Maidstone are also relatively diverse with more than 10% of the population in those districts part of a minority ethnic group.
- Similarly, Dartford and Gravesham are the most diverse districts in Kent for religion, with 10.1% and 13.5% identifying with a minority religion and the lowest proportions saying that they have 'no religion'. This includes:
 - In Dartford, 3.8% of the population are Hindu and 3.5% are Muslim
 - In Gravesham, 8.0% of the population are Sikh – the Guru Nanak Darbar Gurdwara is the largest Gurdwara in Europe

Conclusions:

Dartford, Gravesham and Medway are grouped together in all of the different options. This means that there will always be one unitary authority which has a relatively higher level of diversity and the other unitary authorities will have a higher proportion of White British and lower levels of religious diversity.

There will be an authority – North – which is more diverse than the other authorities in Kent. The new authorities, particularly a North unitary authority, will need to consider how to engage with all residents and reflect their diversity. The unitary authorities should aim to be reflective of the diversity of their populations in the recruitment of staff and to encourage residents, voters and prospective candidates from all communities to participate in council business.

Any engagement model which is developed should aim to be inclusive of the diversity in Kent.

Place

The workstream considered a range of identifying features for 'place' including heritage, culture, economy, nature and landscapes.

Based on the information gathered for this section, we felt it should be possible to establish 'identities' around recognisable and distinctive features for the proposed unitary authorities. There are many commonalities across Kent and within proposed unitary authority boundaries to build upon existing identities; and for those identities to feel meaningful (or in the very least to not feel alienating). The workstream considered the 3UA model best meets the government's criteria due to the scale and the particular combination of districts within the unitary authorities.

Findings and conclusions

The workstream felt that there was a case for changing existing district boundaries so that Swanley (Sevenoaks) was aligned with Dartford in a North UA, and for Swale to be split so that Sittingbourne and Sheppey align with Medway in a North UA and for Faversham to align with Canterbury in an East UA. This was based on economic, geographic and travel factors, as well as our own knowledge of the respective areas.

4UA model

- Intuitively, a 4UA model, in which the proposed unitary authorities cover smaller areas and populations, would be 'more local', and should therefore be more reflective of local identities and more conducive to place making and identity building.
- However, the specific combination of districts could limit or even hinder the ability to reflect and build local identity. For example:
 - It could be argued that Swale would fit more naturally in a North unitary authority alongside Medway, rather than in an East or Mid unitary authority – this is based on how people in

Swale live their lives, that most of the population and geographic area are within the Thames Estuary and North Kent Marshes, and that parts of Swale have been included in the Thames Gateway regeneration project.

- While they are not direct neighbours, there is a strong case to be made for Thanet and Folkestone & Hythe to be included within the same East unitary authority, not only due to their shared coastal identities, but also to build upon the growth of their creative industries – centred around the Turner Gallery and redevelopment of the Old Town in Margate, and the Creative Quarter in Folkestone.
- Another factor to consider is whether the new unitary authorities will have the resources to be able to reflect and build local identity, particularly in areas of high deprivation such as with Option 2 – 4UA which groups Swale and Thanet together.
- The poly-centric nature of Kent and Medway means that employment and economic drivers are spread across different parts of the county. Having a higher number of unitary authorities could mean that individual areas become over-dependent on fewer economic drivers, for example if a South Kent UA became over-dependent on the Port of Dover.
- Further to the above, the creation of more boundaries could hinder access to economic and regeneration opportunities. For example, if Swale was not part of the North UA it would be separated from other areas in Kent that are part of the Thames Gateway regeneration programme, which could make partnership working more difficult.

3UA model

- A 3UA model creates larger unitary authorities than a 4UA model but one benefit of this is that it does not split districts/areas which would potentially ‘fit’ well together, but which are not direct neighbours or could be placed in different areas in a 4UA model. As covered above, Swale and Medway could be considered a good alignment, as could Thanet and Folkestone. In the 3UA model, these districts are included within the same proposed unitary authorities.
- Another benefit is that the impact of deprivation is lessened as the ‘peak IMD’ is lower. This means that the proposed unitary authorities should have more capacity for discretionary spending (albeit probably only marginal).
- There are also well-established geographic areas and groupings which are roughly coterminous with the 3UA model, for example, Kent Police, Health & Care Partnerships (HCPs) and economic partnerships. There are many examples of other organisations and partnerships organising around these broad areas:
 - Thames Estuary and proximity to London in the North
 - Coastal and rural areas in the East and South
 - Affluent commuter towns and rural areas in the West

2UA model

- The scale of the unitary authorities in a 2UA model would limit how reflective of local identity they could be. The proposed West Kent unitary authority would have a population of more than 1 million people and would encompass districts which have fairly tenuous links. The three Northern districts which are urban areas and located on the Thames Estuary, would be grouped with Tunbridge Wells with which they do not share a boundary and is far more rural.
- Their scale would require significant focus in order to successfully promote and build upon the local identities within their areas. The East unitary authority in this model has a high average IMD and the grouping of Swale and Thanet means there is a high concentration of most deprived

LSOAs. This may define how their local identities are perceived (internally and/or externally) and subsequently invested in.

- There is a risk that a 2UA model could undermine an overall Kent identity by creating an East vs West dynamic. The dividing lines in such a dynamic could be defined by their socio-economic profiles, and by their locations and settlement types – the East would have relatively high levels of deprivation and would coalesce around coastal communities and the border; in other words they may feel that they are ‘left behind’. Meanwhile, the West would be defined by its relative affluence, its commuter towns and by its proximity to London.
- In an even system with only two ‘participating’ authorities, in particular where there are differing motivations and drivers, partnership working could become difficult as negotiations could end in deadlock.
 - In a 3UA or 4UA model, this dynamic would likely be lessened. The additional ‘participants’ would reduce the scope for binary thinking and direct competition, and the socio-economic differences would be more even. Also, any deadlock in partnership working becomes less likely.

1UA model (benchmark)

- A likely criticism of a single unitary authority covering the whole county area and representing close to 2 million residents would be that it lacked credibility for representing ‘local identity’ because it would be too remote.
- There may be opportunities with scale to boost specific local areas, but the basis upon which an area is selected could be contentious, or, if multiple campaigns were running concurrently the impacts could be diluted.
- One advantage to having a single UA could be the ability to market or lobby for the whole county as a destination for tourism and investment, and maintain Kent-wide vehicles such as Visit Kent, Produced in Kent and Locate in Kent.

The conclusion of the workstream was that the 3UA model would be most reflective of local identity. The 3UA model creates authorities which are smaller geographically and by population than a two unitary model, but which are large enough to encompass identities and economic opportunities which span districts/areas – for example, in the three unitary model the coastal communities in Folkestone & Hythe, Dover, Thanet and Canterbury are grouped together in East; and the entire Thames Estuary area spanning Gravesham, Dartford, Medway and Swale are grouped together in North.

An important next step with LGR considerations would be to engage with residents on how they perceive their local identities and what the defining features of a proposed unitary authority area could be.

Possible features of local identity and place

The diagram overleaf is purely for illustrative purposes. It was developed collaboratively by the workstream based on desk research of the distinctive features of different parts of Kent and their own knowledge of the county, categorised by ‘Place’, ‘Economy and development’, and ‘Culture, heritage and identity’. Using the 3UA model, it shows the types of features that could contribute to a sense of local identity within the proposed unitary authorities, and which they could promote as part of place-making and identity building initiatives. The features suggested overleaf are therefore not intended to be exhaustive.

NORTH

Place

Thames Estuary and North Kent Marshes
Proximity to London
Urban

Economy and development

Proximity to London and London City Airport
University cluster in Chatham
Ebbsfleet Garden City
Thames Gateway redevelopment
Bluewater shopping centre

Culture, heritage and identity

Religious and ethnic diversity - Gurdwara in Gravesend
Sweeps Festival
Rochester Cathedral
Charles Dickens
Maritime history: Historic Dockyard Chatham



WEST

Place

Proximity to London and Gatwick
Affluent commuter towns
Maidstone County Town
Kent Downs and High Weald
Royal Tunbridge Wells - Spa Town

Economy and development

Entrepreneurial, service-based economy
High productivity
Kings Hill Business Park
Food sciences and agricultural training

Culture, heritage and identity

Oast houses
Castles: Leeds, Hever, Scotney, & more
Spa Valley Railway



EAST

Place

Coastal towns and villages
White Cliffs of Dover and coastline
Kent Downs and High Weald; rural areas
Canterbury city
UK Border - Gateway to Europe - Port of Dover,
EuroTunnel

Economy and development

Creativity and regeneration in Margate and Folkestone
Otterpool Park Garden Town development
University cluster in Canterbury
Life sciences - Discovery Park, Sandwich
Logistics and border facilities
Food and drink; viticulture e.g. Chapel Down Wine
Retail hubs: Ashford Outlet Centre, Westwood Cross

Culture, heritage and identity

Canterbury Cathedral
Dover Castle
Battle of Britain
Dreamland
Turner Contemporary
Animal conservancy: Howlett's, Port Lympne, Wildwood



How people live their lives

Summary - Based on analysis of the data used to indicate how people live their lives (travel to work, education, and healthcare), the workstream consider the 3UA model as being most closely reflective of the geographical range and travel patterns of people living within those areas. In coming to this conclusion, particular consideration was given to the relationships between Swale and Medway and between Ashford, Canterbury, Dover, Folkestone & Hythe, and Thanet. The 3UA model maintains these groupings within the proposed boundaries, while most of the other options create divisions between these districts/areas which would produce unitary authority areas which were less reflective of how people live their lives.

The data that the analysis for this section was based is included in Appendix C.

Indicator	Best fit to Government criteria	Explanation
Travel to work	Option 1 – 3UA	The differences based on the number of unitary authorities would be marginal. Option 1 groups Swale with Medway in North, and groups five Eastern districts which have close travel links.
Travel to education	Option 1 – 3UA	The differences based on the number of unitary authorities would be marginal. Option 1 groups Maidstone with Tonbridge & Malling in West and groups Canterbury, Dover, Folkestone & Hythe, and Thanet in East.
Emergency hospital admissions	Option 1 – 3UA	The 3UA model most closely aligns with current HCP areas. Option 1 groups Maidstone with Tonbridge & Malling West and groups Swale with Medway in North.

Travel to work

Overall findings:

- Most travel to work is within district boundaries and within proposed unitary boundaries. There are relatively few journeys to work outside of home districts or beyond proposed unitary boundaries.
- In seven of the 13 districts, the second most common travel to work destination is ‘outside Kent & Medway’ (presumably to London in most cases). The exceptions were Canterbury, Thanet, Dover, Folkestone & Hythe (which would all be part of the East or South proposed unitary authorities), and Maidstone and Swale
- Only 12% of workers in Kent and Medway travel more than 20km to work. 71% either work mainly from home (30%) or travel fewer than 20km to work (41%). The remaining 17% of workers were categorised as ‘Other’ which could include offshore, abroad or no fixed location.

There are some specific travel to work journeys between districts which are prevalent and warrant highlighting as they could influence where the boundaries of the unitary authorities are set:

- Travel to work is most localised within the Eastern districts - Canterbury, Thanet, Dover, and Folkestone & Hythe. People travel between these districts, but of these Canterbury is the most sizeable destination for work. Ashford, to a lesser extent, is also a major destination for work from these districts.

- In comparison, travel *between* North and West proposed boundaries, and travel *from* North and West to ‘outside of Kent & Medway’ (and vice versa), is more common.
- In Swale, the most common travel to work journey (beyond Swale) is to Medway.
- From Sevenoaks, the most common travel to work journey is to ‘outside K&M’ followed by Dartford. This is reflective of the large commuter population in Sevenoaks but is also likely explained by the position of Swanley within the M25 and its proximity to Dartford and to London.
- Maidstone is a travel to work journey from different parts of the county, including from Ashford and Medway. But the highest rate of travel is *between* Maidstone and Tonbridge & Malling.

Conclusions:

One, two, three or four unitary authorities?

On the basis that most journeys to work are within current district boundaries, and that the second most common destination is ‘outside of Kent & Medway’ (particularly in the North and West of Kent) there is no compelling case about whether a two, three, or four unitary model would be optimal. Fewer unitary authorities would mean fewer travel to work journeys outside of proposed unitary boundaries, but the difference would be marginal. Most journeys would be within the proposed boundaries regardless of their size and makeup, and those which are beyond current district boundaries are more likely to leave Kent & Medway altogether.

District makeup of the unitary authorities

- There could be a case to split Swale so that Sittingbourne and Sheppey would be aligned with Medway and so Faversham would be aligned with Canterbury. However, as a whole district Swale is more closely aligned with Medway due to the overall higher prevalence of travel to work journeys between the two areas.
- There could also be a case to split Sevenoaks district, so that the portion within the M25 including Swanley aligns with Dartford in a North unitary authority.
- There are travel to work links between the districts of Ashford, Canterbury, Dover, Folkestone & Hythe and Thanet suggesting that these five districts should be within the same East unitary authority.
- A case could be made for Maidstone to be placed in multiple different groupings. But the most important relationship for Maidstone in respect to travel to work journeys is with Tonbridge & Malling in a West unitary authority.

On the basis of the points above – the three unitary model, option 1, would be optimal. This places Swale in North Kent alongside Medway, groups the five Eastern districts together in East Kent, and places Maidstone alongside Tonbridge & Malling in West Kent.

Travel to education (KCC only)

Overall findings:

- Nearly all primary school pupils attend school within their home district (92-99%).
- While a slightly lower proportion than for primary school pupils, the vast majority of secondary school pupils attend school within their home district – with c.90% in most districts.
- The exceptions to this are in West Kent, most notably Sevenoaks where only 35% of secondary school pupils attend school within the district. Tunbridge Wells at 78% and Tonbridge & Malling at

65% also have a relatively lower proportion of secondary school pupils attending school within their home districts.

There are some notable journeys between districts for secondary school pupils which could influence the boundaries of the unitary authorities:

- Canterbury is a significant destination for education, with relatively high numbers of pupils from Dover, Swale and Folkestone & Hythe travelling there.
- Dover is also a significant destination for education, with relatively high numbers of pupils from Thanet and from Folkestone & Hythe travelling there.
- Pupils in Sevenoaks are almost as likely to travel to Tonbridge & Malling (28.4%) as they are to stay within their home district (35.1%). Also very notable is that 17.1% of pupils in Sevenoaks travel to Dartford and 13.2% travel to Tunbridge Wells. This is likely because of the proximity and because there are grammar schools within these districts, and Sevenoaks is the only district in Kent without any grammar schools, only hosting an annex to the Weald of Kent Grammar School in Tunbridge.

Conclusions:

One, two, three or four unitary authorities?

The vast majority of pupils' journeys to education are within their home district meaning that the differences between a 1, 2, 3 or 4UA model would be marginal regarding the number of pupils travelling outside of their home area to go to school.

District makeup of the unitary authorities

- The fluidity of travel for secondary pupils between Sevenoaks, Tunbridge Wells and Tonbridge & Malling mean that these districts would make sense as a grouping.
- There are also a high proportion of secondary pupils from Tonbridge & Malling travelling to school in Maidstone which provides a case for Maidstone to be included within the West UA.
- A high proportion of pupils in Sevenoaks travel to Dartford, which may be partially explained by the proximity of Swanley to Dartford and because there is a grammar school in Dartford. This may provide a case to split the northern part of Sevenoaks so that it aligns with Dartford in the North.
- There are education links between Canterbury, Dover, Folkestone & Hythe, and Thanet.

On the basis of the points above – the three unitary model, option 1, would be optimal. This places Maidstone in the West and groups Canterbury, Dover, Folkestone & Hythe, and Thanet together in East Kent.

Emergency hospital admissions

Findings:

- Most emergency admissions are within proposed unitary authority areas.
- The majority (61.3%) of emergency admissions from Swale are to Medway
- Emergency admissions from Sevenoaks are split between North and West areas – 32.2% of emergency admissions are to Dartford and 51.2% are to Tunbridge Wells
- There are close links between Tonbridge & Malling and Maidstone – 39.8% of emergency admissions from Tonbridge & Malling go to Maidstone and 26.6% vice versa.

- The current HCP map most closely aligns with the 3UA model with DGS and Medway & Swale HCPs covering the area of a North unitary authority - albeit with Faversham split from the rest of Swale, and Swanley and North Sevenoaks paired with Dartford and Gravesham.

Conclusions:

One, two, three or four unitary authorities?

- While there are four HCP areas, their boundaries most closely align with the 3UA model.
- Most emergency admissions are within proposed unitary boundaries. Differences between a 1, 2, 3 or 4UA model would be marginal.

District makeup of the unitary authorities

- Swale and Medway are closely linked in terms of emergency admissions. However, Swale is split in the HCP map, with Faversham grouped with East Kent. This may provide a case to split Swale, but if this were not an option, it would make sense to group the whole of Swale district with Medway in a North Kent Unitary as there is a greater overall link between these areas.
- Maidstone and Tonbridge & Malling are linked and therefore grouping them would be beneficial.
- Sevenoaks and Dartford are linked, and Sevenoaks is split in the HCP map, with Swanley part the DGS HCP in North Kent. This may provide a case to split Sevenoaks, but if this is not an option, it would make sense to group the whole of Sevenoaks in a West Kent unitary authority.

On the basis of the points above – the three unitary model, option 1, would be optimal. This places Maidstone in the West alongside Tonbridge & Malling, and places Swale in the North alongside Medway.

Democracy and representation

Summary - For democracy and representation, the workstream considered the impact of different models for councillor numbers for each option, and the current and potential landscape of parish and town councils as the next tier of local democracy in a unitary scenario. It was felt that either a 4UA or 3UA model would be the options that best reflect the government's criteria. Of the 4UA models, option 4 would be the most optimal. These models allow for a good balance between having a workable number of Councillors and having strong democratic representation, based on having a lower population per Councillor ratio.

Indicator	Best fit to Government criteria	Explanation
Councillor numbers		
Number of councillors per UA	Option 4 – 4UA Or - Option 1 – 3UA is also a good option	<p>Currently there are 658 Councillors covering the Kent and Medway area. Replicating this number of Councillors across the new unitary authorities would be unworkable – regardless of whether it was a 1, 2, 3 or 4 UA model. The Local Government Boundary Commission for England (LGBCE) recommends between 30-99 Councillors per new unitary authority.</p> <p>Within a 4UA model there is the opportunity to meet LGBCE's recommendation and to have smaller electorate per councillor than in other options. For this reason, a 4UA model could be perceived as more democratically representative. Of the 4UA models, Option 4 was the most even. Based on replicating the average electorate in Cornwall following a 2018 review, this option would produce unitary authorities with between 53 and 71 Councillors.</p> <p>The 3UA model would also produce a workable number of Councillors, as if replicating Cornwall, it would produce unitary authorities with between 79-92 Councillors.</p> <p>In a 1UA or 2UA model, there would need to be a trade-off between having a workable number of Councillors and the size of electorate per Councillor. The choice would be either to have a large electorate per Councillor or to exceed LGBCE's recommended number of Councillors.</p>
Parish and town councils		
Parished and unparished areas	No optimal option	<p>It is worth noting that in a North unitary in any option, the majority of the population would not be represented by this tier of council. This is predominantly an urban area and is more diverse. Any engagement or devolution model developed by a new North unitary authority would need to consider the implications of this.</p>

Number of Councillors

Background information:

- Currently in Kent and Medway, there are a total of 658 Councillors covering Kent County Council (81), Medway Unitary Authority (59), and 12 district councils (518).
- Based on a population of c.1.88 million in Kent and Medway there is one Councillor per 2,851 people. And based on an electorate of c. 1.35 million in Kent and Medway, there is one Councillor per 2,050 electors.

- The highest population/electorate per councillor is in Medway where there are 4,792 people and 3,493 electors per Councillor
- The lowest is in Sevenoaks where there are 2,018 people and 1,505 electors per Councillor
- The average population per Councillor across England is higher than the Kent and Medway average at 3,360.
- The Local Government Boundary Commission for England (LGBCE) has advised a minimum of 30 Councillors and a maximum of 99 Councillors for new unitary authorities, and that exceptions to this need a strong justification.
- In 2018 the LGBCE conducted a review of Cornwall Council's electoral arrangements and [recommended that they reduce the number of Councillors from 123 to 87](#). This worked out at a projected 5,163 electors per Councillor by 2023 (significantly higher than Kent's current average). When carrying out the review they had three main considerations:
 - Improving electoral equality by equalising the number of electors that each councillor represents.
 - Ensuring that the recommendations reflect community identity.
 - Providing arrangements that support effective and convenient local government.

The table below is based on electorate figures. A table with population figures is included in Appendix D:

Proposed unitary authority	Total electorate	Electorate per councillor – 99 Councillors (LGBCE's advised maximum)	Number of councillors to meet Kent average of 2,050 electorate per Councillor	Number of Councillors to meet Cornwall's average of 5,163 electorate per Councillor
Option 1- 3UA				
North	477,222	4,823	233	92
East	464,222	4,689	226	90
West	407,167	4,133	199	79
Option 2 – 4UA				
North	367,424	3,711	179	71
East	321,747	3,250	157	62
South	252,519	2,551	123	49
West	407,167	4,133	199	79
Option 3 – 4 UA				
North	367,424	3,711	179	71
East	298,941	3,020	146	58
Mid	275,325	2,781	134	53
West	407,167	4,133	199	79
Option 4 – 4UA				
North	367,424	3,711	179	71
East	369,135	3,729	180	71
Mid	336,801	3,402	164	65
West	275,497	3,711	134	53
Option 5 – 2UA				
East	574,266	5,801	280	111
West	774,591	7,824	378	150
Option 6 – 1UA (benchmark)				
Kent & Medway	1,348,857	13,625	658	261

Findings and conclusions:

- If the number of Councillors replicated current Kent averages, every option would produce an unworkable number of Councillors per unitary authority:
 - 2UA model would produce between 280-378 Councillors per unitary authority
 - 3UA model would produce between 193-233 Councillors per unitary authority
 - 4UA models would produce between 130-199 Councillors per unitary authority
- On the premise that a smaller population and electorate per Councillor is more democratically representative, a 4UA model would provide an optimal configuration. If setting the number of Councillors per unitary at 99 (as per the upper limit recommended by LGBCE), the 4UA options would produce unitary authorities with between 3,670 and 5,568 people per Councillor; this is comparable to the current Medway Unitary Authority figure.
 - Of the four unitary models, option 4 is the most even between the proposed unitary authorities.
 - Option 2 produces the widest difference in population per councillor with West having close to 2,000 more people per Councillor than South.
- If the new unitary authorities were to follow LGBCE's approach to setting division boundaries and were to settle at a similar ratio to Cornwall, the 3UA and 4UA models would produce unitary authorities that met LGBCE's recommendation for Councillor numbers, whereas the 2UA would exceed this. The 4UA models would be most flexible as they could feasibly increase the number of Councillors while remaining within LGBCE's recommendation.
 - 2UA model would produce between 111-150 Councillors per unitary authority
 - 3UA model would produce between 79 - 92 Councillors per unitary authority
 - 4UA models would produce between 49 -79 Councillors per unitary authority
- Presuming the divisions in the new unitary authorities do not exactly match the existing district boundaries, there will need to be a process to set new boundaries around larger average electorates. It is unlikely that LGBCE will be able to review the boundaries prior to the inception of the new councils meaning that the boundaries will need to be drawn up initially through the LGR process. Then in the future, there would need to be a boundary review.
- An argument for having fewer Councillors and for having fewer authorities (as would be the case with any of the proposed models) is that it would save money due to fewer Councillor allowances to fund, fewer elections to run, and less resource needed to support Councillors. But some of these savings may be offset by the provision of alternative local representation and engagement (i.e. the cost of setting up Town Councils or other mechanisms such as Neighbourhood Area Committees, which are being promoted by Government as a key vehicle for community engagement).
- In the current two-tier system in Kent 'twin-hatting' is common: an individual is simultaneously a member of a District Council and the County Council. This can potentially lead to conflicts of interest. For example, if a Councillor were to abstain from a vote due to a conflict of interest, as a result of twin hatting, this creates an absence of representation. A single tier of local government would greatly reduce this possibility (it could still theoretically occur if a Councillor is also an MP or Parish Councillor).

On the basis of the points above, option 4 would be optimal. A four unitary model would be most democratically representative as there is the potential to have a lower electorate per Councillor, and this option is most even across proposed unitary authorities.

There is a strong case for the new unitary authorities to prioritise the practicalities of governance and scrutiny above replicating the current number of Councillors across the County – as was the case in Cornwall Council. This would result in a lower number of Councillors but would be much more workable and the role of individual Councillors would be more defined and impactful.

Taking this into account, the 3UA model under the Cornwall ratio would also support the criteria, producing between 79 and 92 Councillors per unitary authority which is more manageable.

Parish and Town Councils, and unparished areas

Findings:

- There are over 300 parish and town councils in the Kent and Medway area. Overall, 56% of the population in Kent and Medway live in parished areas and 44% live in unparished areas. The areas which are covered by this level of representation tend to be rural and those which are not covered tend to be urban. More than 70% of the population [live in urban areas](#).
- Most of the large towns do not have a Town Council or any other type of council at that level, these include (ordered by population size):
 - Maidstone (Maidstone)
 - Gillingham (Medway)
 - Dartford (Dartford)
 - Chatham (Medway)
 - Ashford (Ashford)
 - Rochester (Medway)
 - Margate (Thanet)
 - Royal Tunbridge Wells (Tunbridge Wells)
 - Gravesend (Gravesham)
 - Canterbury (Canterbury)
 - Sittingbourne (Swale)
 - Tonbridge (Tonbridge & Malling)
 - Herne Bay (Canterbury)
 - Whitstable (Canterbury)
- Dover, Folkestone & Hythe, and Sevenoaks districts are all fully parished, including the following Town Councils (ordered by population size). It is notable that the largest town council is in Folkestone which has a population of c.50k. All of the towns larger than this do not have town councils.
 - Folkestone
 - Dover
 - Deal
 - Sevenoaks
 - Swanley
- The districts/areas with the highest proportion of the population living in unparished areas are: Medway (86%), Gravesham (84%), Canterbury (72%), and Dartford (56%). With the exception of Canterbury, these districts/areas are all in the North of the county, are heavily urbanised, and are more diverse than the rest of Kent.

Conclusions

- The areas without town and parish councils are concentrated in the urban areas which would make up a North unitary authority – Medway, Gravesham and Dartford. This means that if a North unitary authority is established, this tier of representation would largely be missing. Most of the rest of Kent is covered by this tier of representation, aside from the towns listed above.
- This could be perceived as a democratic deficit in these areas. To redress this, town councils could be established (and/or the role of existing parish and town councils could be bolstered) with some service delivery and asset responsibilities.
- However, there could be difficulties with the set-up, management, cost, and engagement with these new councils – particularly in the largest urban areas where scale and local representation would be a more pressing issue, and in the North where the model is not common and where there are not as many nearby exemplars.
 - In such instances other community engagement models could be considered (as covered in the next section).
 - As set up and running costs are likely to be a barrier to the establishment of new councils, the ability to precept will be key to their viability.

The principal conclusion is that there will be an authority in any option configuration in which a higher proportion of the population is not covered by a town or parish level council. Steps should be taken to address this across the county and to build an engagement model that means people feel that their local area is sufficiently represented under the new unitary authorities, particularly focusing on towns and where the population has expressed a desire for this tier of engagement/representation.

Governance and engagement

Summary - This section takes into account the current local decision-making and engagement arrangements across Kent, and potential implications for the different options. While this assessment has stated that a 4UA model would be optimal in terms of community engagement mainly due to the smaller scale of the new unitary authorities, the purpose of this section is not to come to firm conclusions - rather, its main purpose is to set out various different options and considerations for enhancing community engagement that could be scaled up or down across different sized unitaries.

Further information relevant to this section can be found in Appendix E.

Indicator	Best fit to Government criteria	Explanation
Governance		
Upper and lower tier councils	No optimal option	<p>On the basis that fewer authorities would mean more straightforward governance routes for partnership working, a 1UA or 2UA model could be considered optimal. However, in comparison to the current situation in which there are 14 councils covering the area, any of the models would be a significant improvement in this regard.</p> <p>There is also an argument that more participants – such as in a 3UA or 4UA model - would bring greater diversity and be more democratically representative.</p>
Parish and town councils	No optimal option	<p>The establishment of new town councils should not automatically be seen as the best vehicle for local representation or enhancing community engagement – each area should decide for themselves whether to establish town councils or not.</p> <p>It is vital for the viability of any new town or parish council that they can precept.</p>
Engagement		
Models of community engagement	<p>A 4UA model (but not option 2)</p> <p>Or -</p> <p>Option 1 – 3UA is also a good option</p>	<p>Each unitary authority should develop its own model depending on what works well for their communities.</p> <p>A 4UA model's smaller scale would most greatly support community engagement. However, option 2 would potentially have high levels of deprivation in its East UA, but might have less resource to undertake localised engagement effectively.</p> <p>The 3UA model would also be of a suitable scale and has the added benefit of being coterminous with strategic partners which should aid continuity of relationships.</p>

Upper and lower tier councils

Background information

- Currently there are 14 separate councils covering the Kent and Medway area – Kent County Council (upper tier), 12 district and borough councils within the KCC footprint (lower tier), and Medway Unitary Authority (upper tier).
- Each of these councils has a broadly similar formal decision-making process in that they each operate a leader and cabinet system. They also operate a number of statutory and non-statutory committees to make decisions on policy and budgetary matters. Further information can be found in Appendix E.
- The formal engagement mechanism for the leaders of the 14 councils to convene are the two partnership groups: Kent Leaders and Joint Kent Chiefs.

Conclusions

- Pan-Kent partnership working can be challenging, due to the number of stakeholders who need to be involved and trying to come to an agreement with 14 separate councils. It can also prove difficult due to the necessity for decisions to pass through 14 different governance processes, for example, for pan-Kent & Medway partnership strategies.
- Therefore, with any of the LGR models, whether it be a 1UA model or a 4UA model, the governance process will be greatly streamlined and it should be easier to reach consensus with fewer participants.
- An argument could be made that more participating authorities would bring greater democratic representation and therefore legitimacy to pan-Kent partnerships. The case could also be made that more participants would bring greater nuance and different perspectives which would enhance the development of strategy and partnerships.

Compared to the current situation, with 14 separate councils, it is highly likely that all of the models would significantly streamline governance processes and make partnership working across Kent more straightforward.

But there is also an argument for more unitary authorities bringing greater diversity and democratic legitimacy to pan-Kent strategies and partnerships.

Town and Parish Councils

- As covered previously, there are over 300 Town and Parish Councils in Kent and Medway, with 56% of the population covered by this tier of council. Most of the large towns, particularly in the urban areas of North Kent, do not have town councils.
- Currently they have fairly limited decision-making powers primarily covering allotments, village greens, burial grounds and crematoriums, car parks and community centres/village halls and some street lighting.
- They are the most local form of government and can provide a local voice for the community responding to consultations and raising concerns with the relevant organisations as well as acting as consultee on planning applications¹.

¹ [Maidstone Borough Council Community Governance Review Terms of Reference 2022/23](#)

- Town and parish councils can also act as a local convenor, enhance civic engagement, and be a vehicle to express local pride. When developing engagement models, new unitary authorities may want to utilise town and parish councils as ‘anchor institutions’ through which they can engage with communities.
- They can raise funds to meet the costs of administration and provision of services through setting a precept which forms part of council tax bills levied on council tax payers within the parish.
 - The Government is reportedly due to publish a ‘Communities White Paper’, and its position on whether new Town and Parish Councils will have the ability to levy a precept is as yet unknown; this will potentially have a significant impact on the capabilities and viability of any new bodies.
- Discussions have been ongoing with the Kent Association of Local Councils (KALC) to explore ways in which greater powers, funding and responsibilities could be devolved to Parish and Town Councils².
- In preparation for Local Government reorganisation (LGR) several District Councils’ Democratic Services teams are undertaking preparatory work which could see these areas have a Town Council. This would enable some continuity of current civic functions, for example the process of mayor-making. These include:
 - Ashford – conducting a review of parished and unparished areas
 - Maidstone – conducting a review of parished and unparished areas
 - Tonbridge & Malling – in June 2025 launched a formal consultation on the creation of a town council for Tonbridge
 - Tunbridge Wells – in June 2025 launched a formal consultation on the creation of town and parish councils in unparished areas (including Royal Tunbridge Wells).
- It should not be assumed that communities will actually want to have a town or parish council. Canterbury undertook the Whitstable community governance review which concluded in October 2024 with a decision to not go ahead with the adoption of a town council for Whitstable because the majority of respondents were not in favour. Concerns were raised about the additional costs associated with a town council precept and lack of support for an additional layer of governance³.

Most of the large towns in Kent do not have a town council, particularly in Dartford, Gravesham and Medway; and overall, 44% of the population in Kent and Medway are not covered by this tier of council. In these areas, town and parish councils would not act as ‘anchor institutions’ for community engagement and alternative models should be considered.

Several districts are conducting (or have already concluded) reviews as to whether to establish town councils in response to LGR. The result of the Canterbury review shows that the establishment of town councils should not automatically be seen as the best vehicle for local representation or enhancing community engagement – each area should decide for themselves whether to establish town councils or not.

It is vital for the viability of any new town or parish council that they can precept.

² [Kent Interim Plan for Local Government Reorganisation](#)

³ [Agenda for Council on Thursday, 24th October, 2024, 7.00 pm | Canterbury City Council](#)

Building on the relationship with the Voluntary, Community and Social Enterprise (VCSE) sector

As of 2022/23, there were 2951 registered charities in Kent with 431 of those active across both Kent and Medway; the majority of active organisations are micro and small (with income less than £100,000), although the highest proportion of income comes from larger organisations. The majority of charities in Kent provide services, with the most common beneficiaries being the general public, followed by children and young people. Charities are unevenly distributed across the county with concentration in major urban areas, within individual districts⁴.

Smaller organisations often have a very specific area of expertise, and limited capacity which can significantly impact their ability to engage with large organisations such as Local Authorities (LAs) or other public sector bodies. Working in partnership acknowledges that the capacity of the majority of the sector is limited. While forums exist which support the strategic voice of the sector, the complex diversity and fragmentation within the sector is important to recognise.

Due to the current democratic geography of Kent, the VCSE sector must work in partnership in different ways across the county, across KCC, Medway Council and the twelve district/borough councils. It has an essential role in engaging with residents and providing services on behalf of local government and other strategic partners such as Kent Police and NHS Kent and Medway. Below are the main partnership arrangements across the county area:

VCSE Strategic Partnership Board - KCC currently engages with the VCSE at a strategic level through its management of and participation in the VCSE Strategic Partnership Board which has oversight of the 2021 [Civil Society Strategy \(CSS\)](#) detailing how KCC will support the social sector through its funding and partnership arrangements.

K&M VCSE Steering Group - this provides a vehicle for the VCSE to be heard in strategic conversations and allows for greater sharing of information and opportunities for collaboration and co-design. KCC funds the steering group to support this engagement, however the group remains fully independent and responsible for their own activity. ([VCSE Kent & Medway](#)).

CYPE Steering Group - this was created in 2018 to represent the issues of VCSE organisations working with children and families in Kent. It provides a space for collaboration and discussion as well as lobbying with key stakeholders such as LAs and other statutory services. The group shares a Chair with the VCSE Steering Group.

Health partnerships - the VCSE is a key partner in the Kent and Medway Integrated Care System and has representatives on the Integrated Care Board (ICB) and at each of the HCPs. **VCSE Health Alliances** are established in each of the four HCPs and provide a forum for networking and collaboration within the sector and with representation from key partners such as LAs and NHS organisations. Above this, the **VCSE Health Alliance Group** includes all the VCSE ICS appointed leads and the leads for the four HCPs in Kent and Medway. The Chair of the group is a standing member on the VCSE Steering Group, providing regular updates at meetings.

Medway Better Together Consortium - Medway Council work closely with Medway Voluntary Action and support the sector through the [Medway Better Together Consortium](#), to provide guidance, advice and support to Medway residents and VCSE organisations. The group meets quarterly and consists of five key VCSE stakeholders to represent the wider sector.

⁴ [Kent Analytics VCS Report - January 2025](#)

In 2022, the [Medway and Swale Voluntary and Community Sector Strategic Framework](#) was developed by the Medway & Swale HCP, of which Medway Council, KCC and Swale Borough Council are key signatories. The framework aims to support effective working relationships between the statutory and public sectors and the VCSE and a variety of working groups were established to create action plans to facilitate the delivery of the framework.

It is noted that VCSE engagement with District Councils is less understood and there are different approaches and varying levels of support, with some holding funding forums and events for the sector, others providing funding to their local volunteer centres.

Some form of VCSE partnership board would be beneficial in continuing in any unitary configuration – it may make more sense for a pan-Kent partnership group with UAs and VCSE as members, rather than each UA having its own group.

The VCSE would most likely appreciate the opportunity that LGR could provide if it offered greater consistency; however, particularly for the smaller and micro organisations, they will most likely want to engage on a localised level also through the creation of community boards or similar.

Models to enhance community engagement

Regardless of the number of unitary authorities chosen for Kent and Medway, it will be imperative to design meaningful models of community and local place engagement. This should include representation from town and parish councils, civil society and the general public. When considering the diversity of Kent – including differences in urban, rural and coastal areas, socio-economic factors and identity (as covered previously) – it is unlikely that a blanket approach to community engagement across Kent and Medway will be effective.

New unitary authorities will need to develop their own models of engagement which are suitable for their relative scale, and which work at the community level. They should aim for equal levels of engagement and participation from all of their communities will also have to consider continuity of pre-existing partnership arrangements.

Examples of different community engagement models

- **Local Boards** ([Kent County Council, 2006-13](#))
From 2006 to 2013, 12 Local boards operated in Kent, each one covering a District council area and with County councillors for these areas as members of the Local Board. The role of the boards was to effectively act as a community group, holding regular public meetings and providing an opportunity for the public to raise issues that affected their communities as well as allocating funding to local projects. They met four times a year.
- **Community Boards** ([Surrey County Council](#))
In their recently published plan for local government reorganisation Surrey County Council plan to “build stronger and simpler arrangements for local community engagement and neighbourhood empowerment”. To achieve this, they are developing a community engagement approach using towns and villages as the focal point of their approach and considering the role of Town and Parish councils. They are testing the creation of Community Boards which would include representatives from organisations and groups: Councillors, residents, businesses, housing associations, VCSE, health, education, and emergency services.

- **Local Community Networks (Somerset Council)**
Somerset Council created 18 “Local Community Networks” to encourage community engagement, partnership working and to provide a connection with local government. Membership would be determined locally but would include broadly the same representation as the Community Boards in Surrey.
- **Leader’s Question Time (Medway UA, Mayor of London, Greater Manchester CA)**
Since 2017, the Greater Manchester Combined Authority has hosted quarterly ‘Question Time’ events, aiming to highlight and answer questions on local issues posted by members of the public. The Mayor of London holds ‘Mayor Question Time’ events ten times a year in which residents of London can submit questions online. And Medway UA are currently trialling questions to Cabinet Members at Cabinet Meetings as an addition to those at Full Council meetings.
- **Participatory budgeting (Tower Hamlets, Glasgow City Council)**
Participatory budgeting is a funding model in which residents are involved in the process of deciding how public money is spent. In the UK, this is most often seen in the form of small-scale community grant allocations, whereby residents will be invited to vote on their preferred proposals within a set budget. Kent County Council have utilised a similar model through the Crowdfund Kent programme.

Funding Considerations

The financial capacity of new unitaries to invest in robust community engagement will be critical in devising effective and sustainable models. Any kind of localised engagement model, particularly community boards or networks will require resource to run them effectively and would be enhanced by defined sources of funding to facilitate decision-making and empowerment at a local level. For example:

- **Staffing:** KCC’s former ‘local board’ model employed Community Liaison Managers to work with each of the county’s 12 Boards.
- **Council funding:** in addition to administration costs, KCC’s local board model saw £10,000 allocated to each county councillor per annum to use for local projects, and the boards could consider bids for larger local projects (up to £20,000) from a separate county-wide fund of £500,000.
- **Town/Parish Council funding:** town and parish councils could potentially act as ‘anchor organisations’ for a community board structure, by using funds raised through their precept to support the board’s work. However, parish councillors are unpaid volunteers which will have capacity implications, and further work would be needed to engage the Kent Association for Local Councils (KALC) in the model, as well as consideration for those areas without town or parish councils.
- **Partner funding:** There may also be options for funding from strategic partners if their organisations are embedded into the community board model and helps meet their own organisational objectives. For example, the Office for the Police & Crime Commissioner (OPCC) provides considerable funding to the VCSE to support victim-based services.
- **Participatory budgeting:** as mentioned above, this could be utilised by community boards to both secure funding and involve the local communities in where it should be spent (e.g. Crowdfund Kent).

More details about funding considerations and examples for different engagement models are included in Appendix E.

The workstream considered opportunities and challenges for local engagement to exist on a spectrum, within which the financial capacity of the new unitaries to invest in robust community engagement will be critical for effective and sustainable models:

- Authorities that cover larger geographic areas, and larger and more diverse populations would likely face greater challenges in engaging with residents and communities at the local level. There would need to be significant resource in place to manage relationships, and it would probably be challenging for a large authority to develop and maintain models which were flexible and suitable for all areas.
- Whereas, an authority covering a smaller area and population would be closer to the residents and communities and would have fewer relationships to manage. In this context (capacity and resource permitting) it is likely that they would be more capable of developing locally suitable models of engagement. Smaller VCSE organisations will want to engage on a very localised level.

For this reason, a 4UA model would be optimal in terms of community engagement. However, the capacity to actually deliver these engagement models will be impacted by the relative spending pressures of the individual authorities, meaning that option 2, in which East has high levels of deprivation, might face specific challenges.

A 3UA model should still be of a scale for effective community engagement and a specific benefit of the 3UA model is that it is roughly coterminous with how strategic partners organise themselves, including the Police, HCPs and VCSE Health Alliances, meaning that there would be continuity in relationships.

A 2UA or 1UA would likely face significant challenges in terms of community engagement, although larger and infrastructure VCSE organisations would be more comfortable engaging with larger, fewer UAs. However, the need to implement additional structures to achieve meaningful local engagement might negate the perceived benefits of LGR.

Regardless of unitary size, but perhaps particularly pertinent for the 1UA and 2UA options given their larger sizes, it will be important that robust formal and informal local engagement models are established. This could mitigate the removal of the district layer of community engagement, while providing a streamlined, coherent approach that can reduce duplication or dilution that can be experienced in the current two tier system.

2) Specific considerations for 2 unitary option

Overall, the 2UA option is fairly similar to the 1UA option in that the large scale of the unitary authorities presents the same risks and opportunities. Differences to the 1UA option are a matter of degree rather than fundamental. One area that could be considered specific to the 2UA option is the risk of creating an East ('left behind') vs West (affluent) dynamic which may not be conducive to partnership working and may undermine an overall Kent identity.

Identity and deprivation

- The size of the two unitary authorities would limit how reflective of local identity they could be. For example, the proposed West UA would have a population of more than 1 million people and would encompass districts that have fairly tenuous links.
- There may be opportunities with scale, as a large unitary authority could take a broader view and direct resources where they are most needed. However, creating larger unitary authorities would not completely negate the challenges posed by deprivation – compared to other options the disparity would be reduced but the overall levels of deprivation remain and are mostly concentrated in the East. The East UA remains similarly deprived as in other options – Swale and Thanet are grouped together – and the West becomes more deprived than in other options.
- A 2UA option risks undermining an overall Kent identity by creating a potentially adversarial East vs West dynamic. The East would have relatively high levels of deprivation and would coalesce around coastal communities and the border (i.e. 'left behind'); and the West would be defined by its relative affluence, its commuter towns and by its proximity to London.
- If this dynamic were to develop, partnership working could become difficult, particularly as there would only be two participating authorities meaning that negotiations could end in deadlock.

How people live their lives

- Considerations on 'how people live their lives' were based upon travel patterns to work and education, and on hospital admissions. Fewer unitary authorities, such as with the 2UA model, would mean fewer cross boundary journeys and the creation of geographic areas which encompass people's daily lives.
- However, most people live in the same districts, or travel a short distance, to where they work, learn or go to hospital meaning that the differences between a 2, 3 or 4UA model would be marginal.
- Despite the large geographical areas covered by the authorities, one drawback is that Swale and Medway are separated. Swale and Medway share close links, for example, Swale's most common travel to work destination (beyond Swale) is Medway, and the majority of emergency hospital admissions from Swale are also to Medway.
- Further to the above, the 2UA model is not coterminous with the HCP map in which Sittingbourne and Sheppey are within the Medway and Swale HCP. The HCP map is much closer to the 3UA model.
- In terms of facilitating how people travel in their areas, management of Highways would be split across the two areas, and management of the Strategic Road Network's M2/A2 and M20/A20 by Highways England would require interacting with two unitaries – this could become more complex for managing schemes such as Operation Brock.

Democratic representation

- Similar to the 1UA model, but to a lesser degree, there would need to be a trade-off between having a workable number of Councillors – the LGBCE recommend 30-99 per authority – and having an electorate per councillor ratio that felt representative.
 - To replicate the current number of Councillors in Kent and Medway, the West UA would have 372 Councillors, and the East UA would have 286 Councillors. This would be unworkable.
 - If the single authority had a similar size of electorate per councillor to Cornwall, then the West would have 150 Councillors, and the East would have 111 Councillors. These are higher than the LGBCE recommendation, but much lower than the 1UA option.
 - To meet the maximum recommended 99 Councillors, in the West there would be 7,824 electors and 10,704 population per Councillor, and in the East there would be 5,801 electors and 8,244 population per Councillor. This is still much higher than the current Kent ratio and higher than other options.

Engagement

- The workstream considered opportunities and challenges for local engagement to exist on a spectrum. Authorities which cover larger geographic areas, and larger and more diverse populations would likely face greater challenges in engaging with residents and communities at the local level. There would need to be significant resource in place to manage relationships, and it would probably be more challenging for a large authority to develop and maintain models which were flexible and suitable for all areas.
 - It is likely that authorities in a 2UA model would face challenges in developing locally flexible and suitable engagement models.
 - However, robust formal and informal engagement mechanisms could mitigate the removal of the district layer of community engagement while providing a streamlined approach that could reduce duplication and dilution that can be experienced in the current two tier system.
 - VCSE organisations will engage with their respective LA for funding/commissioning - larger and infrastructure organisations will be more comfortable engaging with fewer UAs, while small and micro VCSE will also want to engage at a much more local level, and will need to be factored into any local community board arrangements.
- In the 2UA model Dartford, Gravesham and Medway are included in the West UA (in all other options they are part of North). These areas are more ethnically and religiously diverse than other parts of Kent. Another feature is that apart from one town council in Dartford, there are no other town councils within these areas and most of the population live in urban unparished areas. This makes these areas quite distinctive from other parts of the West UA. Any engagement model would need to be sensitive to these differences, meaning that a blanket approach would probably not work.

3) Specific considerations for 3 unitary option

In respect to democratic representation and engagement, the 3UA model could be considered a middle ground between a less representative and more distant 2UA model and a more representative and 'closer' 4UA model. However, in respect to reflecting local identity and reflecting how people live their lives, the picture is more nuanced. This is due to a combination of scale and the specific combination of districts within the 3UA model, compared to the other options.

Identity and deprivation

- The 3UA model represents a middle ground between the 1UA, 2UA and 4UA models in terms of population size and how 'local' the new authorities would be.
- However, analysis shows that the larger scale, in comparison to the 4UA models, would provide benefits in terms of reflecting and boosting local identity. This is because they are large enough to encompass districts/areas which fit well together, but which are separated under the 4UA options. Specifically, the East UA groups together the coastal areas of Folkestone & Hythe, Dover, Thanet and Canterbury, as well as Ashford, which aligns well based on various factors; and the North UA groups together Swale and Medway which have close links.
- The 3UA model creates the least deprived (based on overall average) version of an East UA. This may mean that there is greater capacity for identity building initiatives.
 - Importantly, Swale and Thanet are separated in the 3UA model; this avoids concentrating the high levels of deprivation in these areas within one unitary.
- The 3UA model is roughly coterminous with how many other organisations and partnerships organise themselves, including Kent Police, HCPs and economic partnerships. It also feels relatively intuitive based on geographic features:
 - Thames Estuary, urban areas and proximity to London in the North
 - Coastal and rural areas in the East
 - Affluent commuter towns and rural areas in the West

How people live their lives

- Considerations on 'how people live their lives' was based upon travel patterns to work and education, and on emergency hospital admissions. Fewer unitary authorities would mean fewer cross boundary journeys and the creation of geographic areas which encompass people's daily lives, meaning that a 3UA model would represent a middle ground between a 2UA or 4UA model.
- However, most people live in the same districts, or travel a short distance to where they work, learn or go to hospital meaning that the differences between a 2, 3 or 4UA model would be marginal.
- In regard to reflecting people's lives there are some specific journeys between districts/areas which are prevalent and would remain within the boundaries of the 3UA model when compared to the 4UA options and to the 2UA model (though to a lesser degree).
 - Swale and Medway are grouped together in the North UA which is important in regard to journeys for work and particularly for healthcare.
 - There are travel to work and travel to education links between Ashford, Canterbury, Dover, Folkestone & Hythe, and Thanet - these five districts are grouped together within the East UA.
 - Maidstone and Tonbridge & Malling are grouped together in the West UA. There is a high prevalence of travel between these districts for work.

- The 3UA model is roughly coterminous with the HCP map – with the exceptions of North Sevenoaks being part of the Dartford, Gravesham and Swanley (DGS) HCP and Faversham (Swale) being part of the East Kent HCP.
- In terms of facilitating how people travel in their areas, management of Highways would be split across the three areas. Management of the Strategic Road Network in Kent by Highways England, particularly the M2/A2 and M20/A20 would require interacting with three unitaries – this could become more complex for managing schemes such as Operation Brock.

Democratic representation

- In a 3UA model it would be possible to strike a balance between having a workable number of Councillors – between 30-99 as recommended by LGBCE – and having a Councillor per elector ratio that felt representative and was comparable to other areas (i.e. Cornwall)
 - If replicating the elector per Councillor ratio in Cornwall the North UA would 92 Councillors, East UA would have 90 and West UA would have 79.
 - Based on these figures there would be some flexibility to create divisions with fewer electors per Councillor and still be within the maximum recommended figure of 99 Councillors per unitary authority.

Engagement

- The workstream considered opportunities and challenges for local engagement to exist on a spectrum. Authorities which cover larger geographic areas, and larger and more diverse populations would likely face greater challenges in engaging with residents and communities at the local level. There would need to be significant resource in place to manage relationships, and it would probably be more challenging for a large authority to develop and maintain models which were flexible and suitable for all areas. Whereas, an authority representing a smaller area and population would be closer to the residents and communities and would have fewer relationships to manage. In this context (capacity and resource permitting) it is likely that they would be more capable of developing flexible and locally suitable models of engagement.
 - The three UA model represents a middle ground between the 1UA, 2UA and the 4UA models.

4) Specific considerations for 4 unitary option

Due to the smaller population sizes, and therefore the ability to have smaller population/electorate per Councillor ratios, the 4UA options are considered the most democratically representative and most able to engage with residents and communities. It would seem intuitive that smaller unitary authorities would feel more local and reflective of people's lives, however, analysis indicates that their smaller scale may actually limit how reflective they can be and could have the effect of artificially separating districts which might otherwise sit well together.

Identity and deprivation

- Intuitively, a 4UA model, in which the proposed unitary authorities cover smaller areas and populations, would be 'more local', and should therefore be more reflective of local identities and more conducive to place making and identity building.
- However, the specific combination of districts/areas could limit or even hinder the ability to reflect and build local identity. As covered under the consideration for a 3UA model, in regard to identity, it would make sense to group together the coastal areas and to group Swale and Medway. This is not the case in any of the 4UA models.
- There is also the potential impact of deprivation upon a new unitary authority's capacity to deliver identity building initiatives, as areas of high deprivation may require those authorities to prioritise significant resource pressures.

Option 2 – this option groups Swale and Thanet together in East which creates the most deprived unitary authority of all of the options. It also separates Thanet from Folkestone & Hythe and Dover.

Option 3 – this option separates Folkestone & Hythe from Dover and Thanet, and the combination of Swale and Folkestone & Hythe in Mid was not considered a logical fit compared to other configurations.

Option 4 – this option creates the most affluent version of West because it does not include Maidstone. This could be politically contentious and might entrench socio-economic divisions. It would also create a unitary with the highest concentration of protected land – this could make place-shaping harder in this area. However, the Mid Kent UA could create a hub for rural Kent in terms of identity and engagement.

How people live their lives

- Considerations on 'how people live their lives' was based upon travel patterns to work and education, and on emergency hospital admissions. Fewer unitary authorities would mean fewer cross boundary journeys and the creation of geographic areas which encompass people's daily lives, meaning that a 4UA model would be the least representative of how people live their lives.
- However, most people live in the same districts, or travel a short distance, to where they work, learn or go to hospital meaning that the differences between a 2, 3 or 4UA model would be marginal.
- In regard to reflecting people's lives, it was felt that the combinations of districts within the 3UA model would better meet the government criteria than any of the 4UA options (as covered above).
- In terms of facilitating how people travel in their areas, management of Highways would be split across the four areas. Management of the Strategic Road Network in Kent by Highways England, particularly the M2/A2 and M20/A20 would require interacting with four unitaries – this could become more complex for managing schemes such as Operation Brock.

Option 2 – this separates Swale and Medway which is an important journey for healthcare and work. It also separates Ashford, Canterbury, Dover, Folkestone & Hythe, and Thanet which have close links.

Option 3 – as above, this separates Swale and Medway as well as splitting the five Eastern districts.

Option 4 – this groups Canterbury, Dover, Folkestone & Hythe, and Thanet together which would have benefits in terms of their links but separates them from Ashford; it also separates Swale and Medway; as well as separating Maidstone from Tonbridge & Malling which have close travel to work links.

Democratic representation

- A 4UA model would best meet the criteria in regard to democratic representation and would produce unitary authorities that had a workable number of Councillors. There would also be the most flexibility to create divisions with smaller electorates.
 - If replicating the elector per Councillor ratio in Cornwall, a 4UA model would produce between 49 to 79 Councillors per unitary authority.
 - Based on producing authorities with the maximum recommendation of 99 Councillors, there would be between 2,551 to 4,133 electors per Councillors. This is similar to the current Medway figure of 3,493 electors.

Option 4 – this option creates the most even spread of Councillors with 53 in West, 65 in Mid and 71 in both North and East.

Engagement

- The workstream considered opportunities and challenges for local engagement to exist on a spectrum. An authority representing a smaller area and population, would be closer to the residents and communities and would have fewer relationships to manage and could more successfully engage locally operating smaller VCSE organisations. In this context (capacity and resource permitting) it is likely that they would be more capable of developing flexible and locally suitable models of engagement.
 - The 4UA model options would therefore be most able to develop and maintain engagement models that are flexible and suitable for local residents, communities and the VCSE.
 - All 4UA options create a North UA which will have the most diverse UA in the county, and will need to tailor engagement accordingly to effectively reach their communities.

Option 2 – this groups Swale and Thanet which are the most deprived districts in Kent. This might create significant resource pressures meaning that capacity for effective engagement could be limited.

5) Specific considerations for single (1) unitary option (benchmark)

Within a 1UA model some of the issues which arise from differences between areas or by separating areas would not arise, or would be less apparent. For example, there would be no socio-economic disparities between authorities, and critical Highways services would remain within the single authority. However, a 1UA model would likely be viewed as not democratically representative due to low Councillor numbers (or conversely there would be unpractically high number Councillors), and would be the least reflective of local identities.

Identity and deprivation

- A likely criticism of a single unitary authority covering the whole county area and representing close to 2 million residents would be that it lacked credibility for representing 'local identity' because it would be too remote. The 'Garden of England' would not be enough to counter this.
- In a single unitary authority, the issue of creating socio-economic disparities between different UA areas would not exist and it should be much more straightforward to redistribute funding and resource to where it is most needed.
- There may be opportunities with scale to boost specific local areas, but the basis upon which an area is selected could be contentious, or, if multiple campaigns were running concurrently the impacts could be diluted.

How people live their lives

- Considerations on 'how people live their lives' was based upon travel patterns to work and education, and on emergency hospital admissions. Within a 1UA model all of these journeys (aside from those that left Kent and Medway altogether) would be within a single unitary authority area.
- Management of Highways would be by a single authority, and there would be a single conversation with Highways England regarding Kent's Strategic Road Network.

Democratic representation

- With a 1UA model there would need to be a trade-off between having a workable number of Councillors – the LGBCE recommend 30-99 per authority – and having an electorate per councillor ratio that felt representative.
 - To replicate the current number of Councillors in Kent and Medway, a single unitary authority covering the entire area would have 658 Councillors. This would obviously be unworkable.
 - If the single authority had a similar size of electorate per councillor to Cornwall, then there would be 261 Councillors. This is much lower but would still be unworkable.
 - To meet the maximum recommended 99 Councillors there would be 13,625 electors per Councillor. By population this would be 18,948 per Councillor. This is 6.6x the current ratio and much higher than other options.

Engagement

The workstream considered opportunities and challenges for local engagement to exist on a spectrum. Authorities that cover larger geographic areas and larger and more diverse populations would likely face greater challenges in engaging with residents and communities at the local level. There would need to be significant resource in place to manage relationships, and it would probably

be more challenging for a large authority to develop and maintain models which were flexible and suitable for all areas.

- A single unitary would cover the whole county area – encompassing urban, rural and coastal areas, areas of deprivation and affluence, and differences in diversity. A blanket approach to engagement would be unlikely to be effective and it would be very challenging for such an authority to develop and maintain flexible and suitable engagement models for all areas.
- However, robust formal and informal engagement mechanisms could mitigate the removal of the district layer of community engagement, while providing a streamlined approach that could reduce duplication and dilution that can be experienced in the current two tier system.
- This model might require consideration of new or enhanced mechanisms to facilitate more localised democracy and decision-making to prevent the Unitary from being too remote – this would require significant resource.
- VCSE organisations will engage with their respective LA for funding/commissioning – larger and infrastructure organisations will be more comfortable engaging with fewer UAs, while small and micro VCSE will also want to engage at a much more local level, and will need to be factored into any local community board arrangements.

6) Conclusion

In considering all the above information, analysis indicates that the **three unitary option** provides the most scope for successful Local Government Reorganisation into a unitary system, for the following reasons:

- It provides the most evenly balanced configuration of **deprivation** factors across the three unitaries, and avoids creating imbalances between unitaries with a high concentration of deprivation and those with very low levels. It also creates the least deprived version of an East Kent UA.
- In terms of **place and identity**, this option best reflects the existing local identities within East, West and North in the most logical way; one that communities could identify with, grouping together districts that are deemed to fit well together, rather than separating them.
- This option best reflects **how people live their lives** through travel to work, education and healthcare, with most local travel patterns being preserved within UA boundaries.
- Despite four unitaries being optimal for **representation**, the 3UA option would still strike a good balance between having a workable number of councillors per UA and having a councillor per elector ratio that felt representative.
- It most **closely aligns with the configurations of strategic partners**, as it is roughly coterminous with the delivery models of bodies such as Kent Police and the Health & Care Partnerships.
- Regarding **community engagement**, this option provides a middle ground in terms of size and the level of resource and capacity needed to establish, manage and sustain formal and informal local engagement structures.

It is worth noting that in viewing the three unitary option the most optimal regarding democracy and local identity, in terms of most of the factors considered, this option would be optimised by splitting parts of Sevenoaks and Swale so that Swanley sits with North Kent and Faversham/East Swale sits with East Kent, as these respective areas align more closely. The workstream acknowledges the challenges of resulting boundary change proposals, the limitations of LGBCE to address this during the initial stages of Kent and Medway's LGR process, and MHCLG's preference to maintain existing district boundaries.

Democracy and Local Identity - Appendices

Contents

Appendix A - Identity: deprivation and diversity	<u>Page 34</u>
Appendix B - Identity: Place	<u>Page 39</u>
Appendix C - How people live their lives	<u>Page 42</u>
Appendix D - Democracy and representation	<u>Page 46</u>
Appendix E - Enhancing community engagement	<u>Page 51</u>
Appendix F - Parish and unparished boundary maps	<u>Page 61</u>

Appendix A – Identity: deprivation and diversity

Deprivation - Average IMD

The analysis below is based on the average Index of Multiple Deprivation (IMD) scores for each district, set out in the table below. This quantifies relative levels of deprivation over whole district geographies.

District	IMD average score
Thanet	31.3
Swale	27.1
Folkestone and Hythe	24.1
Medway	23.9
Dover	22.2
Gravesham	21.4
Dartford	18.8
Ashford	18.5
Canterbury	16.8
Maidstone	16.5
Tonbridge and Malling	13.3
Sevenoaks	12.4
Tunbridge Wells	11.3

The scores below are averages of the district averages within the proposed unitary authority. For example, in Option 1 the North Unitary Authority is made up of Dartford - 18.8, Gravesham - 21.4, Medway - 23.9, and Swale - 27.1, which produces an average of 22.8.

Proposed unitary	Option 1 – 3UA	Option 2 – 4UA	Option 3 – 4UA	Option 4 – 4UA	Option 5 – 2UA	Option 6 – 1UA
North	22.8	21.6	21.4	21.4	-	19.8
East	22.6	25.1	23.4	23.4	23.3	
West	13.4	13.4	13.4	12.3	16.8	
Mid	-	-	23.2	20.7	-	
South	-	21.6	-	-	-	
Ratio (most : least deprived)	1.7	1.9	1.8	1.9	1.4	-
Range (most - least deprived)	9.4	11.7	10.1	11.1	6.5	-

Deprivation - Top 10% most deprived LSOAs in England

The analysis below is based on the number of 'Lower Super Output Areas' (LSOAs) which are in the top 10% most deprived in England (labelled as 'most deprived'), set out in the table below. This gives an indication as to where the most acute deprivation is located.

District	Number of LSOAs in 10% most deprived in England	Number of LSOAs in district	% of LSOAs in district which are 'most deprived'	% of Kent and Medway's 'most deprived' LSOAs (i.e. /65)
Thanet	18	84	21%	28%
Swale	16	85	19%	25%
Medway	14	163	9%	22%
Dover	5	67	7%	8%
Folkestone and Hythe	4	67	6%	6%
Gravesham	2	64	3%	3%
Dartford	1	58	2%	2%
Canterbury	2	90	2%	3%
Maidstone	2	95	2%	3%
Ashford	1	78	1%	2%
Tonbridge and Malling	0	72	0%	0%
Sevenoaks	0	74	0%	0%
Tunbridge Wells	0	68	0%	0%
Total for Kent and Medway	65	1065	6%	100%

Proposed unitary authority	Number of LSOAs in 10% most deprived in England	Total number of LSOAs	% of LSOAs which are 'most deprived'	% of Kent and Medway's 'most deprived' LSOAs (i.e. /65)
Option 1 – 3UA				
North	33	370	9%	51%
East	30	386	8%	46%
West	2	309	1%	3%
Option 2 – 4UA				
North	17	285	6%	26%
East	36	259	14%	55%
South	10	212	5%	15%
West	2	309	1%	3%
Option 3 – 4 UA				
North	17	285	6%	26%
East	25	241	10%	38%
Mid	21	230	9%	32%
West	2	309	1%	3%
Option 4 – 4UA				
North	17	285	6%	26%
East	29	308	9%	45%
Mid	19	258	7%	29%
West	0	214	0%	0%
Option 5 – 2UA				
East	46	471	10%	71%
West	19	594	3%	29%
Option 6 – 1UA (benchmark)				
Kent & Medway	65	1065	6%	100%

Findings:

- More than half (55%) of Kent and Medway's LSOAs categorised as 'most deprived' (top 10% nationally) are within two districts – Thanet and Swale
- All of the 4UA models have a greater range in average IMDs and greater ratios, compared to the 2UA and 3UA models. This means that these options produce unitary authorities which are more deprived overall as well as creating wider disparities between unitary authorities.
- In all of the options, there is a disparity between West which has low levels of deprivation on average and very few of the most deprived LSOAs.
- Option 1 – 3UA creates the least deprived version of an East unitary authority with an average IMD of 22.6 and 8% of LSOAs categorised as most deprived. This is the only option in which East is not the most deprived unitary authority, with North scoring slightly higher.
 - This creates two unitary authorities which are close to parity in terms of deprivation.
 - It is the option with the lowest 'peak' IMD score
 - It is the option with the equal lowest 'peak' LSOAs categorised as most deprived
 - In this option, Swale and Thanet are in separate unitary authorities.
- Option 2 – 4UA creates an East unitary authority which has an average IMD of 25.1 and where 14% of LSOAs are categorised as most deprived. This would be the most deprived unitary authority across all of the options.
 - This unitary authority is made up of Thanet and Swale –the two most deprived districts in the whole Kent and Medway – and Canterbury.

- Option 5 – 2UA has the lowest disparity and ratio between unitary authorities. However, this is because West has a higher IMD than in other options at 16.8, rather than the East unitary authority having a lower IMD which remains at a similarly high score of 23.3. Meaning that with this option, on average, the West would become more deprived, but the East would not become less deprived.

Diversity

The data below is based on the 2021 Census.

Ethnicity

District	White British	All white ethnicities	All minority ethnic groups
Ashford	82.6%	88.1%	11.9%
Canterbury	82.5%	89.2%	10.8%
Dartford	67.3%	74.5%	25.5%
Dover	90.3%	94.9%	5.1%
Folkestone & Hythe	88.0%	92.6%	7.4%
Gravesham	68.3%	76.6%	23.4%
Maidstone	82.0%	89.8%	10.2%
Medway	78.3%	84.3%	15.7%
Sevenoaks	85.6%	92.1%	7.9%
Swale	88.6%	93.8%	6.2%
Thanet	87.3%	93.0%	7.0%
Tonbridge & Malling	88.3%	93.3%	6.7%
Tunbridge Wells	84.2%	91.5%	8.5%
Kent and Medway	82.4%	88.6%	11.4%

Religion

District	No religion	Christian	Hindu	Muslim	Sikh	All minority religions
Ashford	40.7%	47.6%	2.0%	1.6%	0.1%	6.0%
Canterbury	42.0%	46.6%	0.8%	1.8%	0.2%	4.4%
Dartford	36.5%	48.1%	3.8%	3.5%	1.7%	10.1%
Dover	42.4%	49.6%	0.6%	0.6%	0.1%	2.5%
Folkestone & Hythe	41.8%	48.0%	1.5%	1.0%	0.0%	4.5%
Gravesham	32.1%	49.2%	1.4%	3.1%	8.0%	13.5%
Maidstone	40.1%	49.3%	1.4%	1.9%	0.2%	5.0%
Medway	43.0%	45.1%	1.1%	2.7%	1.6%	6.5%
Sevenoaks	39.5%	51.8%	0.7%	0.9%	0.2%	2.7%
Swale	45.3%	47.2%	0.4%	1.0%	0.1%	2.3%
Thanet	44.1%	46.7%	0.6%	1.5%	0.1%	3.4%
Tonbridge & Malling	42.8%	48.7%	0.9%	1.0%	0.2%	3.0%
Tunbridge Wells	40.3%	49.7%	1.0%	1.7%	0.1%	3.8%
Kent and Medway	41.2%	47.9%	1.2%	1.8%	0.9%	5.7%

Findings:

Ethnicity

- In 10 of the districts, 82% or more are White British and 89% or more are ethnically White. These figures are higher than the national average.
- In contrast Dartford and Gravesham have a far more diverse population with approximately a quarter part of a minority ethnic group which is above the national average.
- Within Dartford and Gravesham there are specific communities which are prevalent:
 - In Dartford 9.9% of the population are Asian – with 4.4% of the population Indian
 - In Dartford 10.5% of the population are Black – with 8.4% of the population African
 - In Gravesham 11.2% of the population are Asian – with 7.6% of the population Indian
 - In Gravesham 6.5% of the population are Black – with 4.9% African
- Medway is also more ethnically diverse than other parts of Kent, with 15.7% part of a minority ethnic group. Ashford, Canterbury and Maidstone are also relatively diverse with more than 10% of the population in those districts part of a minority ethnic group.

Religion

- Similarly, Dartford and Gravesham are the most diverse districts in Kent for religion, with 10.1% and 13.5% identifying with a minority religion and the lowest proportions saying that they have ‘no religion’. This includes:
 - In Dartford, 3.8% of the population are Hindu and 3.5% are Muslim
 - In Gravesham, 8.0% of the population are Sikh – the Guru Nanak Darbar Gurdwara is the largest Gurdwara in Europe

Appendix B – Identity: Place

Building ‘pride of place’

In 2022, the Local Government Association (LGA) published the findings and recommendations from ethnographic research titled – ‘[What makes people feel contented where they live, and what makes people deep-rooted and proud?](#)’. One of the places included in the research was Margate. The report included findings and recommendations relevant to how a new unitary authority could shape local place and identity. These include:

- ‘Deep-rooted contentedness’ is a pre-condition for ‘Pride in Place’. Pride in place occurs through external factors and are highly dependent on the particular places – which are difficult for councils to manufacture. Therefore, councils should focus on delivering the conditions for contentedness as a first order priority.
- The drivers for people to feel contentedness with place are:
 - Core material needs are met (e.g. housing and jobs)
 - Good local amenities (e.g. shops and open-spaces)
 - Sufficient social connections
 - An optimistic view of the place’s future, in which they can see their role
- Developing pride in place is a second order priority because it is not necessary for people’s flourishing and It is not always feasible for councils to bring about of. Pride of place may “bubble up organically” but can be “boosted” if councils “tune in to emerging signals”.
- In Margate, the Turner Gallery did not feature as a source of pride. Rather, Dreamland was a more prominent source of pride in place. There are three boosters for pride in place:
 - Something being authentically distinctive and particular about the place. Especially things which are about looking forward to what the place is becoming, not looking back to where it came from.
 - External validation or perceived envy from outsiders
 - Sense of superiority compared to a local “rival” place

Possible features of local identity and place

The diagram overleaf is purely for illustrative purposes. It was developed collaboratively by the workstream based on desk research of distinctive features of different parts of Kent and their own knowledge of the areas in which they live, categorised by 'Place', 'Economy and development', and 'Culture, heritage and identity'. Using the 3UA model, it shows the types of features that could contribute to a sense of local identity within the proposed unitary authorities and which they could promote as part of place-making or identity building initiatives.

The observations of the workstream were that there were enough commonalities across Kent, as well as specific distinctive features within existing districts upon which to build identity and place, and that this could be achieved within a two, three or four unitary model. However, it was felt that the three unitary model would be the most optimal in this regard. The three unitary model creates authorities which are smaller geographically and by population than a two unitary model, but which are large enough to encompass broad and complementary identities which span districts – for example, in the three unitary model the coastal communities in Folkestone and Hythe, Dover, Thanet and Canterbury are grouped together in East; and the entire Thames Estuary area spanning Gravesham, Dartford, Medway and Swale are grouped together in North.

Please note the caveat that this was an exercise conducted solely by KCC Officers, and the features suggested in the diagram are not intended to be exhaustive. An important next step with LGR considerations would be to engage with residents on how they perceive their local identities and what the defining features of a proposed unitary authority area could be.

NORTH

Place

Thames Estuary and North Kent Marshes
Proximity to London
Urban

Economy and development

Proximity to London and London City Airport
University cluster in Chatham
Ebbsfleet Garden City
Thames Gateway redevelopment
Bluewater shopping centre

Culture, heritage and identity

Religious and ethnic diversity - Gurdwara in Gravesend
Sweeps Festival
Rochester Cathedral
Charles Dickens
Maritime history: Historic Dockyard Chatham



WEST

Place

Proximity to London and Gatwick
Affluent commuter towns
Maidstone County Town
Kent Downs and High Weald
Royal Tunbridge Wells - Spa Town

Economy and development

Entrepreneurial, service-based economy
High productivity
Kings Hill Business Park
Food sciences and agricultural training

Culture, heritage and identity

Oast houses
Castles: Leeds, Hever, Scotney, & more
Spa Valley Railway



EAST

Place

Coastal towns and villages
White Cliffs of Dover and coastline
Kent Downs and High Weald; rural areas
Canterbury city
UK Border - Gateway to Europe - Port of Dover, EuroTunnel

Economy and development

Creativity and regeneration in Margate and Folkestone
Otterpool Park Garden Town development
University cluster in Canterbury
Life sciences - Discovery Park, Sandwich
Logistics and border facilities
Food and drink; viticulture e.g. Chapel Down Wine
Retail hubs: Ashford Outlet Centre, Westwood Cross

Culture, heritage and identity

Canterbury Cathedral
Dover Castle
Battle of Britain
Dreamland
Turner Contemporary
Animal conservancy: Howlett's, Port Lympne, Wildwood



Appendix C - How people live their lives

Travel to work

Travel-to-work flows

This table shows the home and work district for all 'usual residents' aged 16 years and over that either live or work in Kent & Medway.

N.B. This is based off Census 2021 data, which took place during the coronavirus (COVID-19) pandemic, a period of unparalleled and rapid change; the national lockdown, associated guidance and furlough measures will have affected the travel to work topic.

% of column total		Home district														Outside K&M
		Dartford	Gravesham	Medway	Swale	Canterbury	Thanet	Dover	Folkestone and Hythe	Ashford	Maidstone	Tunbridge Wells	Tonbridge and Malling	Sevenoaks		
Work district	Dartford	43.1%	6.3%	1.5%	0.4%	0.1%	0.1%	0.0%	0.1%	0.1%	0.5%	0.2%	0.7%	1.9%	27.9%	
	Gravesham	1.9%	37.8%	1.4%	0.4%	0.1%	0.0%	0.1%	0.0%	0.1%	0.3%	0.1%	0.5%	0.4%	5.0%	
	Medway	1.1%	2.6%	44.1%	3.5%	0.6%	0.2%	0.2%	0.2%	0.5%	2.1%	0.2%	1.8%	0.3%	8.3%	
	Swale	0.2%	0.4%	1.7%	43.9%	1.5%	0.5%	0.4%	0.2%	0.5%	0.9%	0.1%	0.4%	0.1%	2.4%	
	Canterbury	0.0%	0.1%	0.2%	1.7%	40.6%	3.5%	4.3%	1.8%	1.2%	0.2%	0.0%	0.1%	0.0%	2.0%	
	Thanet	0.0%	0.0%	0.1%	0.2%	1.6%	42.6%	2.1%	0.3%	0.1%	0.0%	0.0%	0.0%	0.0%	1.3%	
	Dover	0.0%	0.0%	0.0%	0.2%	1.1%	2.1%	39.0%	2.1%	0.3%	0.0%	0.0%	0.0%	0.0%	1.7%	
	Folkestone and Hythe	0.0%	0.0%	0.1%	0.1%	0.6%	0.3%	3.4%	40.8%	1.8%	0.1%	0.0%	0.0%	0.0%	1.9%	
	Ashford	0.1%	0.1%	0.2%	0.6%	1.1%	0.3%	1.3%	3.9%	48.1%	1.1%	0.6%	0.2%	0.1%	4.1%	
	Maidstone	0.4%	0.7%	2.5%	1.9%	0.5%	0.2%	0.3%	0.5%	2.2%	45.2%	1.3%	3.5%	0.5%	5.9%	
	Tunbridge Wells	0.1%	0.3%	0.2%	0.1%	0.0%	0.0%	0.0%	0.1%	1.0%	1.9%	48.6%	3.0%	0.9%	15.0%	
	Tonbridge and Malling	0.4%	1.0%	2.0%	0.9%	0.2%	0.1%	0.1%	0.2%	0.6%	4.2%	2.9%	42.8%	1.5%	7.4%	
	Sevenoaks	1.5%	1.1%	0.4%	0.2%	0.0%	0.0%	0.0%	0.0%	0.2%	0.6%	1.4%	2.6%	42.3%	17.0%	
	Outside Kent & Medway	15.9%	8.4%	5.0%	2.5%	1.6%	1.1%	1.1%	1.5%	2.5%	3.3%	4.9%	5.2%	10.2%		
	Other (e.g. offshore/outside the UK)	0.1%	0.2%	0.1%	0.1%	0.2%	0.3%	0.8%	0.5%	0.2%	0.2%	0.1%	0.1%	0.2%		
	Does not apply (i.e. not in work)	35.1%	41.1%	40.5%	43.3%	50.2%	48.7%	47.0%	47.8%	40.4%	39.2%	39.5%	38.9%	41.6%		
Grand total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%		



23



Overall findings:

- Most travel to work is within district boundaries and within proposed unitary boundaries. There are relatively few journeys to work outside of home districts or beyond proposed unitary boundaries.
- In seven of the 13 districts, the second most common travel to work destination is 'outside Kent & Medway' (presumably to London in most cases). The exceptions were Canterbury, Thanet, Dover, Folkestone & Hythe (which would all be part of the East or South proposed unitary authorities), and Maidstone and Swale
- Only 12% of workers in Kent and Medway travel more than 20km to work. 71% either work mainly from home (30%) or travel fewer than 20km to work (41%). The remaining 17% of workers were categorised as 'Other' which could include offshore, abroad or no fixed location.

There are some specific travel to work journeys between districts which are prevalent:

- Travel to work is most localised within the proposed East or South boundaries, specifically Canterbury, Thanet, Dover, and Folkestone & Hythe. People travel between these districts, but of these Canterbury is the most significant destination for work. Ashford, to a lesser extent, is also a major destination for work from these districts.
- In comparison, travel *between* North and West proposed boundaries, and travel *from* North and West to 'outside of Kent & Medway' (and vice versa), is more common.
- In Swale, the most common travel to work journey (beyond Swale) is to Medway.
- From Sevenoaks, the most common travel to work journey is to 'outside K&M' followed by Dartford. This is reflective of the large commuter population in Sevenoaks but is also likely explained by the position of Swanley within the M25 and its proximity to Dartford and to London.
- Maidstone is a travel to work journey from different parts of the county, including from Ashford and Medway. But the highest rate of travel is *between* Maidstone and Tonbridge and Malling.

Travel-to-learn flows: secondary (KCC only)

This matrix shows the percentage of secondary pupils living in a district by which district their school is based in.

The table includes data on all children in year 7-11 from the School Census in January 2023. Data on children attending schools in KCC but living in Medway or outside Kent has been excluded as we do not hold the equivalent data for KCC pupils attending schools outside of KCC.

		Home district											
Pupils in Year-T1 (January 2023 School Census)		Dartford	Gravesham	Swale	Canterbury	Thanet	Dover	Folkestone and Hythe	Ashford	Maidstone	Tunbridge Wells	Tonbridge and Malling	Sevenoaks
School District	Dartford	86.3%	7.5%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	17.1%
	Gravesham	10.8%	89.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.5%	5.7%
	Swale	0.1%	0.0%	92.1%	3.0%	0.1%	0.1%	0.0%	0.6%	0.6%	0.0%	0.0%	0.0%
	Canterbury	0.0%	0.0%	3.9%	93.1%	1.1%	7.4%	3.2%	2.1%	0.0%	0.0%	0.0%	0.0%
	Thanet	0.0%	0.0%	0.2%	2.1%	92.5%	0.9%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%
	Dover	0.1%	0.1%	0.1%	0.8%	6.2%	89.4%	3.8%	0.5%	0.0%	0.0%	0.0%	0.0%
	Folkestone and Hythe	0.0%	0.0%	0.0%	0.2%	0.0%	1.9%	89.6%	2.3%	0.0%	0.0%	0.0%	0.0%
	Ashford	0.0%	0.0%	0.4%	0.6%	0.1%	0.4%	3.1%	90.1%	1.4%	2.7%	0.1%	0.0%
	Maidstone	0.2%	0.6%	2.6%	0.1%	0.0%	0.0%	0.1%	3.3%	89.8%	1.0%	19.5%	0.4%
	Tunbridge Wells	0.7%	0.2%	0.1%	0.0%	0.0%	0.0%	0.0%	0.6%	4.5%	78.1%	12.4%	13.2%
	Tonbridge and Malling	0.5%	2.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.4%	3.2%	18.0%	65.2%	28.4%
	Sevenoaks	1.4%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.2%	2.2%	35.1%
Grand Total		100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Overall findings:

- Nearly all primary school pupils attend school within their home district (92-99%).
- While slightly lower proportion than for primary school pupils, the vast majority of secondary school pupils attend school within their home district – with c.90% in most districts.
- The exceptions to this are in West Kent, most notably Sevenoaks where only 35% of secondary school pupils attend school within the district. Tunbridge Wells at 78% and Tonbridge and Malling at 65% also have a relatively lower proportion of secondary school pupils attending school with their home districts.

There are some notable journeys between districts for secondary school pupils which could influence the boundaries of the unitary authorities:

- Canterbury is an important destination for education, with relatively high numbers of pupils from Dover, Swale and Folkestone & Hythe travelling there.
- If travelling out of their districts, pupils in Canterbury are most likely to go to Swale and there is a also high prevalence of pupils travelling in the other direction. This may be due to the proximity between Faversham and Canterbury.
- Dover is also an important destination for education, with relatively high numbers of pupils from Thanet and from Folkestone and Hythe travelling there.
- Pupils in Sevenoaks are almost as likely to travel to Tonbridge and Malling (28.4%) as they are to stay within their home district (35.1%). Also very notable is that 17.1% of pupils in Sevenoaks travel to Dartford and 13.2% travel to Tunbridge Wells. This is likely because of the proximity and because there are grammar schools within these districts, and Sevenoaks is the only district in Kent without any grammar schools.

Emergency hospital admissions

Acute hospital patient flows: emergency admissions

This table shows the percentage of emergency admissions from each district in Kent & Medway into each Acute Hospital.

Data period: April 2023 to March 2024

Data source: Hospital Episode Statistics (HES)

*Other activity relates to out of county organisations and Kent based private or community hospitals.

Emergency admissions 2023/24 as % of total admissions for each district		Hospital Site								Total	% Of Kent & Medway total
		Darent Valley Hospital (Dartford)	Medway Maritime Hospital	The Maidstone Hospital	The Tunbridge Wells Hospital	William Harvey Hospital (Ashford)	QEQM Hospital (Thanet)	Kent & Canterbury Hospital	Other *		
District of residence	Dartford	90.2%	1.2%	0.4%	0.4%	0.2%	0.1%	0.1%	7.4%	13,732	6.3%
	Gravesham	85.5%	4.6%	1.7%	0.9%	0.4%	0.1%	0.1%	6.6%	12,933	5.9%
	Medway	2.6%	82.5%	6.1%	1.2%	0.7%	0.1%	1.2%	5.6%	30,823	14.1%
	Swale	0.4%	61.3%	9.1%	2.3%	15.1%	2.0%	3.9%	5.9%	15,620	7.1%
	Canterbury	0.1%	0.4%	0.5%	0.3%	24.4%	50.6%	18.5%	5.3%	13,615	6.2%
	Thanet	0.1%	0.2%	0.1%	0.2%	3.6%	81.1%	10.4%	4.3%	15,188	6.9%
	Dover	0.1%	0.2%	0.2%	0.2%	43.9%	36.9%	14.5%	4.1%	11,631	5.3%
	Folkestone and Hythe	0.1%	0.1%	0.3%	0.3%	82.1%	1.1%	11.9%	4.1%	12,157	5.6%
	Ashford	0.1%	0.2%	1.6%	1.7%	82.6%	0.5%	8.1%	5.1%	14,617	6.7%
	Maidstone	0.4%	1.8%	64.7%	26.6%	2.2%	0.1%	0.7%	3.7%	27,445	12.6%
	Tunbridge Wells	0.1%	0.1%	6.2%	88.3%	0.6%	0.0%	0.1%	4.6%	17,170	7.9%
	Tonbridge and Malling	0.8%	2.6%	39.8%	52.2%	0.4%	0.0%	0.4%	3.7%	18,677	8.5%
	Sevenoaks	32.3%	0.5%	4.7%	51.2%	0.3%	0.0%	0.0%	10.9%	14,946	6.8%
Kent & Medway		13.5%	16.9%	14.1%	18.8%	15.8%	11.0%	4.4%	5.4%	218,554	100.0%



22



Findings:

- Most emergency admissions are within proposed unitary authority areas.
- The majority (61.3%) of emergency admissions from Swale are to Medway
- Emergency admissions from Sevenoaks are split between North and West areas – 32.2% of emergency admissions are to Dartford and 51.2% are to Tunbridge Wells
- There are close links between Tonbridge and Malling and Maidstone – 39.8% of emergency admissions from Tonbridge and Malling go to Maidstone and 26.6% vice versa.
- Health and care partnerships are not contiguous with district boundaries – see map below. The current HCP map most closely aligns with option 1, the three unitary model with DGS and Medway & Swale HCPs covering the area of a North unitary authority albeit with Faversham split from the rest of Swale, and Swanley and North Sevenoaks paired with Dartford and Gravesham.

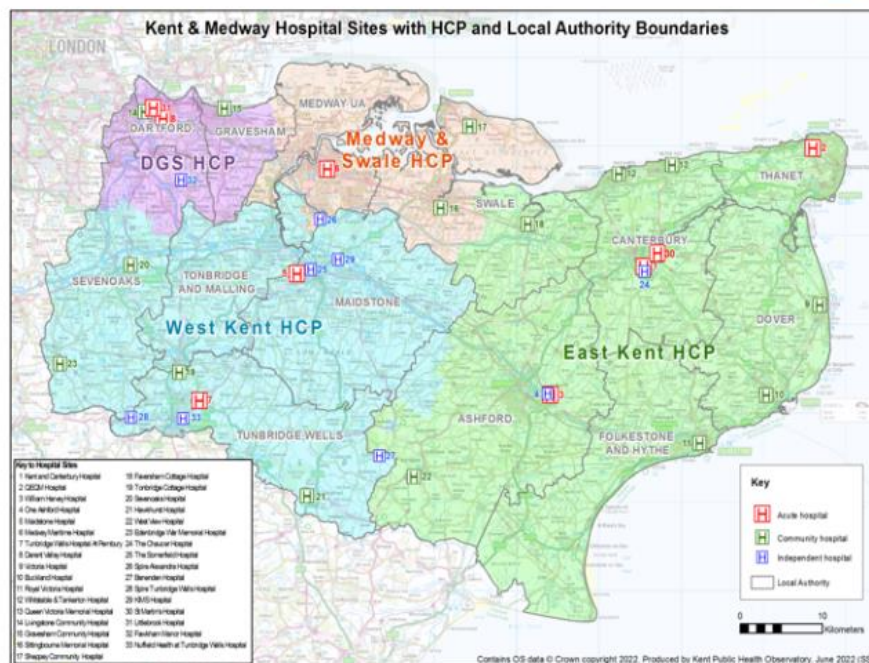
Health and care partnerships

There are some areas where HCPs are not contiguous with district boundaries. The most significant being:

- Faversham & east Swale
- Swanley & north Sevenoaks

Smaller non-contiguous areas are:

- Higham (NE Gravesham)
- Blue Bell Hill (NE T&M)
- Smarden (NW Ashford)



Appendix D - Democracy and representation

Number of Councillors

Background information:

- Currently in Kent and Medway, there are a total of 658 Councillors covering Kent County Council (81), Medway Unitary Authority (59), and 12 district councils (518).
- Based on a population of c.1.88 million in Kent and Medway there is one Councillor per 2,851 people. And based on an electorate of c. 1.35 million in Kent and Medway, there is one Councillor per 2,050 electors.
 - The highest population/electorate per councillor is in Medway where there are 4,792 people and 3,493 electors per Councillor
 - The lowest is in Sevenoaks where there are 2,018 people and 1,505 electors per Councillor
 - The average population per Councillor across England is higher than the Kent and Medway average at 3,360.
- The Local Government Boundary Commission for England (LGBCE) has advised a minimum of 30 Councillors and a maximum of 99 Councillors for new unitary authorities, and that exceptions to this need a strong justification.
- In 2018 the LGBCE conducted a review of Cornwall Council's electoral arrangements and [recommended that they reduce the number of Councillors from 123 to 87](#) (with 1 Councillor per division). This worked out at a projected 5,163 electors per Councillor by 2023. When carrying out the review they had three main considerations, notably these do not include an upper or lower cap on the number of electors per Councillor:
 - Improving electoral equality by equalising the number of electors that each councillor represents.
 - Ensuring that the recommendations reflect community identity.
 - Providing arrangements that support effective and convenient local government.

The table below sets out the following based on *population* figures:

Proposed unitary authority	Total population	Population per councillor – 99 Councillors	Number of councillors to meet Kent average of 2,851 population per Councillor
Option 1- 3UA			
North	661,559	6,698	232
East	663,111	6,682	233
West	551,223	5,568	193
Option 2 – 4UA			
North	508,492	5,136	178
East	452,858	4,574	159
South	363,320	3,670	127
West	551,223	5,568	193
Option 3 – 4 UA			
North	508,492	5,136	178
East	415,712	4,199	146
Mid	400,466	4,045	140
West	551,223	5,568	193
Option 4 – 4UA			
North	508,492	5,136	178
East	525,949	5,313	180
Mid	470,657	4,754	165
West	370,795	3,745	130
Option 5 – 2UA			
East	816,178	8,244	286
West	1,059,715	10,704	372
Option 6 – 1UA (benchmark)			
Kent & Medway	1,875,893	18,948	658

The table below is based on electorate figures:

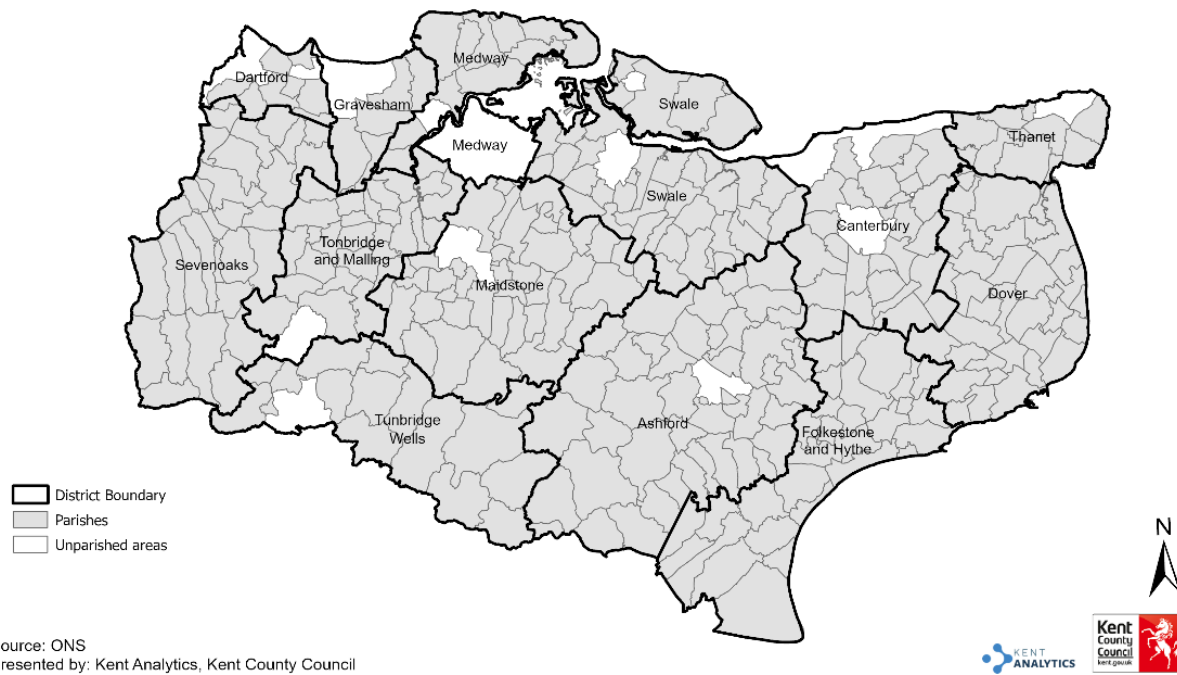
Proposed unitary authority	Total electorate	Electorate per councillor – 99 Councillors (LGBCE's advised maximum)	Number of councillors to meet Kent average of 2,050 electorate per Councillor	Number of Councillors to meet Cornwall's average of 5,163 electorate per Councillor
Option 1- 3UA				
North	477,222	4,823	233	92
East	464,222	4,689	226	90
West	407,167	4,133	199	79
Option 2 – 4UA				
North	367,424	3,711	179	71
East	321,747	3,250	157	62
South	252,519	2,551	123	49
West	407,167	4,133	199	79
Option 3 – 4 UA				
North	367,424	3,711	179	71
East	298,941	3,020	146	58
Mid	275,325	2,781	134	53
West	407,167	4,133	199	79
Option 4 – 4UA				
North	367,424	3,711	179	71
East	369,135	3,729	180	71
Mid	336,801	3,402	164	65
West	275,497	3,711	134	53
Option 5 – 2UA				
East	574,266	5,801	280	111
West	774,591	7,824	378	150
Option 6 – 1UA (benchmark)				
Kent & Medway	1,348,857	13,625	658	261

Parish and Town Councils, and unparished areas

Findings:

- There are over 300 parish and town councils in the Kent and Medway area. Overall, 56% of the population in Kent and Medway live in parished areas and 44% live in unparished areas. The areas which are covered by this level of representation tend to be rural and those which are not covered tend to be urban. More than 70% of the population [live in urban areas](#).
- Most of the large towns do not have a Town Council or any other type of council at that level, these include (ordered by population size) –
 - Maidstone (Maidstone)
 - Gillingham (Medway)
 - Dartford (Dartford)
 - Chatham (Medway)
 - Ashford (Ashford)
 - Rochester (Medway)
 - Margate (Thanet)
 - Royal Tunbridge Wells (Tunbridge Wells)
 - Gravesend (Gravesham)
 - Canterbury (Canterbury)
 - Sittingbourne (Swale)
 - Tonbridge (Tonbridge and Malling)
 - Herne Bay (Canterbury)
 - Whitstable (Canterbury)
- This is not the case in Dover, Folkestone & Hythe, and Sevenoaks districts which are all fully parished, including the following Town Councils (ordered by population size):
 - Folkestone
 - Dover
 - Deal
 - Sevenoaks
 - Swanley
- In Thanet, the only unparished area is Margate which is its largest town covering c.60k population. Ramsgate and Broadstairs both have Town Councils.
- It is notable that the largest town council – Folkestone – cover a population of c.50k. All of the areas larger than this do not have a town council.
- The districts with the highest proportion of the population living in unparished areas are: Medway (86%), Gravesham (84%), Canterbury (72%), and Dartford (56%).

Parish & Non-civil parish boundaries in Kent & Medway 2024



Appendix E – Enhancing Community Engagement

Kent and Medway Local Identity

Kent is a large and diverse geography with significant differences across the county in terms of deprivation, rurality, economic growth, unemployment, benefits uptake and more¹, and any solution to local government reorganisation in Kent must be cognisant of the diversity, local identity of the districts whilst considering issues of financial viability.

Kent and Medway possesses strong local identities, and Kent and Medway's political leaders are rightly proud of the unique identities of their local areas and want the best for the communities they serve. Given the county's size and diversity of civic identities, the vision for local government reorganisation would lead to large governance structures that could risk not being reflective of the identities of the communities that make up Kent and Medway. This will therefore require a system with a distinct localism offer which builds on the strength of civic society and uses local intelligence to strengthen decision making that is responsive to differences in needs, challenges and opportunities.

Current Decision Making Arrangements in Kent and Medway

KCC decision-making

- Kent County Council (KCC) Members (councillors) are the decision and policy makers. They use information from council officers and represent the views of their residents. KCC operates a Leader and Cabinet system.
- Officers have a responsibility to provide information, facts and figures to elected members to support their decision-making. Once decisions are made, officers are then responsible for implementation and making sure services are delivered to residents.
 - [Corporate Management Team \(CMT\)](#)
 - [Council wide responsibilities of Directors](#)
- The [constitution](#) sets out how the council operates and decisions are made.
- Decisions to be taken by Cabinet or Cabinet Members that are expected to have a significant impact on the budget, or on the services, KCC provides, are called 'key' decisions. Key decisions to be taken over the next six months are updated each month in the [Forthcoming Executive Decisions \(FED\)](#).
- [Council committees](#) meet regularly to make decisions on policy and budgetary matters for council services. Several of these are statutory.
- There are also a number of [Select Committees](#). These are akin to sub-committees, and generally look at topics in a focused, in-depth way. These forms will propose decisions to the Cabinet or relevant Cabinet Member.
- External to County, District/Borough/City decision-making, there exists a range of [outside bodies](#).

Medway Council decision-making

- Medway Council has similar [decision-making processes](#) in place. The main difference is that they are already an all-purpose, unitary, council.

¹ [Kent Interim Plan for Local Government Reorganisation](#)

District/Borough/City decision-making

- The Districts have a similar decision-making process in place:
 - [Ashford](#)
 - [Canterbury](#)
 - [Dartford](#)
 - [Dover](#)
 - [Folkstone and Hythe](#)
 - [Gravesham](#)
 - [Maidstone](#)
 - [Sevenoaks](#)
 - [Swale](#)
 - [Thanet](#)
 - [Tonbridge & Malling](#)
 - [Tunbridge Wells](#)

Local Democracy in Kent – Town and Parish Councils

There are currently over 300 Town and Parish Councils in Kent and a further 11 parishes in Medway; all of which have limited decision making powers primarily covering allotments, village greens, burial grounds and crematoriums, car parks and community centres/village halls and some street lighting.

Parish and Town Councils can raise funds to meet the costs of administration and provision of services through setting a precept which forms part of council tax bills levied on council tax payers within the parish. They are also the most local form of government and can provide a local voice for the community; responding to consultations and raising concerns with the relevant organisations as well as acting as consultee on planning applications².

Discussions have been ongoing with the Kent Association of Local Councils (KALC) to explore ways in which greater powers, funding and responsibilities could be devolved to Parish and Town Councils³. KALC's role in representing local councils will be to ensure that the Parish and Town councils are included in the ongoing discussions and changes that will occur as a result of local government reorganisation⁴.

A number of areas are unparished in Kent, including many of the major towns. In preparation for Local Government reorganisation (LGR) several District Councils' Democratic Services teams are undertaking preparatory work which would see these areas have a Town Council. This would enable some continuity of current civic functions, for example the process of mayor-making. The Government is reportedly due to publish a 'Communities White Paper', and its position on whether new Town and Parish Councils will have the ability to levy a precept is as yet unknown; this will potentially have a significant impact on the capabilities and viability of any new bodies.

Details of the known community governance reviews where there are geographical areas without existing parish or town councils are shown below:

Ashford Borough Council – Considering a potential review of Ashford's urban and unparished areas, recognising that the introduction of unitary authorities could create the opportunity for town and parish councils to take on greater responsibilities and give residents more ownership and control of services delivered on their behalf. A more localised council could give residents a bigger say and there would be an additional tier of councillors to represent residents, focusing on more immediate local issues⁵

² [Maidstone Borough Council Community Governance Review Terms of Reference 2022/23](#)

³ [Kent Interim Plan for Local Government Reorganisation](#)

⁴ [Devolution | Kent Association of Local Councils](#)

⁵ [Report Title: Community Governance Review of Ashford Borough's Urban Area](#)

Maidstone Borough Council – With the rapid timetable of proposed local government reorganisation, Maidstone proposed a review of the unparished and neighbouring areas of Maidstone Town (‘Urban Area’) in January. It was felt that with the introduction of unitary councils, there may be a ‘gap’ created between residents and local representatives and felt ‘more acutely in areas without a parish council’⁶. It is proposed that the final recommendations will be approved in April 2026.⁷

Tonbridge and Malling Borough Council – in June 2025 launched a formal consultation to start a community governance review into the creation of a town council in Tonbridge; they note that a town council may be seen to offer a more locally focused and responsive part of local government under any new proposed local government reorganisation arrangements⁸.

Tunbridge Wells Borough Council – In June 2025 launched a formal consultation considering if new parish and/or town council(s) should be created to represent the unparished areas of Tunbridge Wells. It is highlighted that it is important to engage with the consultation now should local government reorganisation take place in Kent⁹.

Canterbury City Council – Undertook the Whitstable community governance review which concluded in October 2024 with a decision to not go ahead with the adoption of a town council. It was felt that a Town Council would not represent the best interests of the community in light of rejection of the proposal by the majority of respondents, concerns raised about the additional costs associated with a town council precept and lack of support for an additional layer of governance¹⁰.

It is important to note that some of this activity is, in part, being driven by a concern that the introduction of unitary authorities through local government reorganisation may result in a loss of a locally focused government and the potential for residents to lose their voice when engaging on local issues. In the [Kent Interim plan for Local Government Reorganisation](#), it was noted that there are further opportunities to explore as proposals are developed about the future role of Town and Parish Councils.

Current strategic relationships with the Voluntary, Community and Social Enterprise (VCSE) sector

The Civil Society strategy for Kent was agreed in 2021 and recognised the role and contribution of charities and voluntary organisations to our local communities and charities as a core part of that; setting out our commitments to supporting a strong and vibrant civil society in Kent.

Due to the current democratic geography of Kent, the VCSE sector has to work in partnership in different ways across the county, across both KCC, Medway Council and the twelve district/borough councils. It has an essential role in engaging with residents and providing services on behalf of local government and other strategic partners such as Kent Police and NHS Kent and Medway

As of 2022/23, there were 2951 registered charities in Kent with 431 of those active across both Kent and Medway; KCC Analytics data shows that the majority of active organisations are micro and small although the highest proportion of income comes from larger organisations.

⁶ [Maidstone Borough Council Community Governance Review - Maidstone Urban Area - January 2025](#)

⁷ [Community Governance Review - Maidstone Urban Area - Indicative Timetable and Actions](#)

⁸ [Review into a town council for Tonbridge – Tonbridge and Malling Borough Council](#)

⁹ [Tunbridge Wells Community Governance Review - 2025](#)

¹⁰ [Agenda for Council on Thursday, 24th October, 2024, 7.00 pm | Canterbury City Council](#)

The majority of charities in Kent are providing services, with the most common beneficiaries being the general public, followed by children and young people, and charities are unevenly distributed across the county with concentration in major urban areas, within individual districts¹¹.

The Civil Society Covenant Framework, currently being developed by Central Government, highlights the importance of strategic authorities engaging with the VCSE and fostering a relationship that acknowledges all that civil society does for local communities and the services it provides on behalf of local government. The upcoming covenant will be based around four key principles¹²:

1. **Recognition:** to ensure a strong and independent civil society
2. **Partnership:** to ensure effective service delivery and policy making, and shared learning of best practices
3. **Participation:** to ensure people and communities can be heard and make a difference
4. **Transparency:** to ensure civil society and government have the information needed to best serve people and communities

KCC has already made progress in embedding these principles in our practice and engagement with the sector through engagement mechanisms such as the VCSE Strategic Partnership Board and the [Kent and Medway VCSE Steering Group](#). This provides a vehicle for the VCSE to be heard in strategic conversations and allows for greater sharing of information and opportunities for collaboration and co-design.

It should also be noted that several members of the VCSE Steering Group are also Chairs of the four [Health and Care Partnership Alliances](#) to support engagement with the wider sector and these meetings are attended by both local government (county and district councils) as well as NHS representatives.

It is essential that, regardless of what mechanism is used for community engagement, the VCSE must play a role in enabling the new unitary authorities to access and amplify community voices, especially those who are harder to reach for the strategic authorities.

Models to Enhance Community Engagement

Regardless of the number of unitary authorities chosen for Kent and Medway, it will be imperative to design meaningful models of community and local place engagement, with a more localised focus on the needs and identity of an area and with the appropriate representation from both town/parish councils as well as civil society and the wider general public. This is reflective of their importance in both community cohesion and their links to local identities.

From 2006 to 2013, **12 Local Boards operated in Kent**, each one covering a District council area and with County councillors for these areas as members of the Local Board.

The role of the boards was to effectively act as a community group, holding regular public meetings and providing an opportunity for the public to raise issues that affected their communities as well as allocating funding to local projects.

The boards were established by KCC to provide County council members with the opportunity to work more closely with the public and voluntary and private sector partners locally through a regular forum for community consultation and participation. It was hoped that this would generate discussion and

¹¹ [Kent Analytics VCS Report - January 2025](#)

¹² [Civil Society Covenant Framework launch - GOV.UK](#)

debate on matters of particular relevance to the area and consider the specific public service needs of the local community and the effectiveness of existing services.

The boards met four times a year and were open to the public and publicised locally and in the local media.

It is proposed that a similar model of 'local' or 'community' boards could be one of several suitable conduits to enhance community engagement in a new unitarised landscape, building on learning of similar examples across the country. These are detailed below and are suggested as possible options for unitary authorities to explore.

Potential Future Models for Engagement

Leader's Question Time

Since 2017, the Greater Manchester Combined Authority has hosted 'Question Time' events; aiming to highlight and answer questions on local issues posted by members of the public¹³. Events are held quarterly and provide an opportunity for residents to have a voice on any concerns that matter to them.

Similarly, the Mayor of London holds 'Mayor Question Time' events ten times a year, residents of London can submit questions accessibly online on the full range of matters within the mayoral remit, including policing, fire service and transport, with any questions not answered during the meeting receiving a written response¹⁴.

Medway Council are currently trialling questions to Cabinet Members at Cabinet Meetings as an addition to those at Full Council meetings, with an online form for residents to submit their queries and opportunities to attend meetings to ask their question in person¹⁵.

In a similar way to the mechanism employed by Directly Elected Mayors, the new unitary council Leaders could hold public Leader's question time sessions to enable the public to engage with their local authority.

Surrey Community Boards

In their recently published plan for local government reorganisation Surrey County Council plan to "build stronger and simpler arrangements for local community engagement and neighbourhood empowerment, using a wide range of inclusive approaches to leverage current good practice"¹⁶.

Their plan acknowledges that it is the towns and villages that are the "real places" that residents identify with and their proposed two unitary councils will work with partners and residents in collaboration so public services are more locally focused and responsive in delivering outcomes that matter most to communities.

To achieve this, they are developing a community engagement approach using towns and villages as the focal point of their approach and considering the role of Town and Parish councils to strengthen local engagement and decision making as well as the possible creation of local committees comprising of unitary councillors and community area partnerships and boards.

¹³ [Mayor's Question Time - Greater Manchester Combined Authority](#)

¹⁴ [Questions to the Mayor | London City Hall](#)

¹⁵ [Asking a question at a Full Council or Cabinet meeting | Asking a question at a Full Council or Cabinet meeting | Medway Council](#)

¹⁶ [Final Plan - Devolution and Local Government Reorganisation - Surrey County Council](#)

The creation of community boards is being tested in Autumn 2025 in several localities across the region, considering key considerations such as geographic coverage, decision-making parameters, officer support requirements and costs.

It is anticipated that their community boards would include representation from the following:

- Unitary Councillors
- Residents Associations
- Businesses and BIDs
- Education and FE's
- Housing Associations
- Surrey Residents
- VCSE
- Fire
- Police
- NHS Primary Care Networks
- Council Officers
- Town / Parish Councillors

The vision for Community boards is that they would be used to convene local partners to understand key issues drive collaboration and deliver local improvements in partnership with communities.

This concept builds on the idea of local boards that KCC previously implemented in Kent and could be a welcome opportunity to provide meaningful reach to local communities to engage and localise decision making and could be a useful roadmap on which to base our own community engagement model.

Somerset Local Community Networks

Somerset Council created 18 'Local Community Networks' to encourage community engagement and development and local partnership working with the aim to improve outcomes for residents and to provide a strong connection between local government, residents, businesses and partners¹⁷.

Core membership is made up of the following, with some variations determined locally by each network:

- The elected Somerset Council Councillors representing the electoral divisions covered by the Local Community Networks
- An elected representative from each City, Town or Parish Council within the area covered by the Local Community Networks
- Representatives from the following groups or organisations:
 - Local Neighbourhood policing team
 - Somerset National Health Service
 - Devon and Somerset Fire and Rescue Service
 - Education
 - Representatives from Voluntary, Community, Faith, and Social Enterprise Organisations
 - Representatives from Businesses or Trade Groups

¹⁷ [Local Community Network questions and answers](#)

It was proposed that the networks will meet six to eight times each year, starting in Summer 2023. Approaching Somerset council about their success with this model could be helpful when designing our own approach to community engagement in Kent.

Funding Considerations

A 'community board' model will require funding in order to sufficiently meet the needs of community engagement, both in regard to staffing to administer the process and ensure equity of service across the entire Kent geography as well as to potentially fund projects in locations identified by the boards.

In the Somerset model it is reported that Local Community Networks will be able to access funding, both local and national, in order to address priorities for their area and will be able to influence the budgets and policies of the new council. Further information will need to be sought to understand how this works in practice.

In the previous model used in Kent for Local Boards, KCC's Cabinet and Cabinet Members could consult on strategic issues affecting a Local Board's area and each county councillor could recommend local projects for financial support. At the time, up to a total of £10,000 a year per county councillor. Each Local Board also considered bids for larger local projects (up to £20,000) which were funded from a separate rate fund of £500,000 for Kent as a whole.

KCC's former Local Board model employed 'Community Liaison Managers' (CLMs) to work with each of the county's 12 boards. Unitary authorities could choose to resource a liaison/manager equivalent role to work with each Board, similar to KCC's previous local board model. Their role could be to liaise across the boards in a singular unitary as well as work in collaboration with other CLMs in other unitary authorities in order to share best practice and opportunities for partnership working.

It is possible that Town / Parish councils could be used as the 'anchor organisations' for a community board structure, using funds raised through their precept to support the work of the board. However, it is worth noting that parish councillors are unpaid volunteers and there may be capacity constraints that could hinder their involvement. Further conversations will need to take place with KALC in order to understand how they can best engage with a localised engagement model, especially in areas without a Town/Parish council.

There may also be options for funding from strategic partners if their organisations are embedded into the community board model based on their current funding activity of the VCSE and community work:

- The Office for the Police and Crime Commissioner (OPCC) gives considerable funding¹⁸ to the VCSE in Kent in support of victim-based services through the Home Office Domestic Abuse (DA) and Stalking Perpetrator Interventions Grant and Victim Services Grant funding. There may be a willingness to fund partnership working across a community board model if it were seen to be in support of their organisational objectives.
- NHS Kent and Medway's work with the VCSE is supported by a [memorandum of understanding](#) between the Kent and Medway Integrated Care Board and the VCSE, setting out how these partners will engage and collaborate to embed the VCSE sector in system level governance and decision making arrangements across the Kent and Medway Integrated Care System (ICS).

¹⁸ [Victim Services Funding OLD](#)

- Due, in part, to this commitment to the VCSE, NHS Kent and Medway has supported community-based work in partnership with KCC via the Crowdfund Kent programme¹⁹. The programme, designed to give local organisations and groups the opportunity to take forward projects and ideas to improve their local area could also be used a source of funding for community boards, with members of the public ‘pledging’ to projects taking place in their local area as well as continuing to provide an opportunity for strategic partners to work in collaboration with one another to fund community-led programmes.

A further consideration for the allocation of funding, that improves the sense of localised investment and engagement, could be in the form of ‘participatory budgeting’. This is a funding model in which citizens are involved in the process of deciding how public money is spent. In the UK, this is most often seen in the form of small scale community grant allocations and can improve local involvement through increased volunteering and the formation of new groups, increasing confidence in local service providers, and increasing control for residents over the allocation of resources²⁰.

In a 2011 National Evaluation of Participatory Budgeting in England²¹, considering six different areas of the UK, results showed that participatory budgeting could change mainstream services, attracting additional funds into deprived areas from other funders, leading to different types of projects receiving funding than might otherwise been the case. It also enhanced the ability of providers to address local service needs amongst hard to reach groups and served to improve residents’ and organisations’ self confidence in tackling neighbourhood issues and working with public sector organisations.

Kent County Council has used this concept of participatory budgeting through the Crowdfund Kent programme, with VCSE organisations and community groups in Kent creating projects that are most needed in their local communities and receiving not only funding support from public sector organisations but also from members of the public.

Unitaries could choose to utilise this form of resident participation in their engagement forums, where a specific sum is allocated to community boards (or their equivalent) and the public can decide how to spend this money in their local area, ensuring a localised approach to community funding.

¹⁹ [CrowdFund Kent - Home](#)

²⁰ [Participatory Budgeting | Local Government Association](#)

²¹ [National Evaluation of Participatory Budgeting in England](#)

Specific Considerations for 2 Unitary Option

Authorities which cover larger geographic areas, and larger and more diverse populations would likely face greater challenges in engaging with residents and communities at the local level. However, robust formal and informal engagement mechanisms could mitigate the removal of the district layer of community engagement while providing a streamlined approach that could reduce duplication and dilution that can be experienced in the current two tier system.

In respect to community engagement and the value of retaining current well established relationships such as those with the VCSE, strategic partners and Town / Parish Councils, this work has identified that regardless of the model chosen, a new method of more localised engagement and a continuation of pre-existing partnership arrangements, would be most beneficial to the residents of Kent.

It would be essential, especially in models that have higher numbers of unitary authorities, that there is a consistency of approach to community engagement to avoid unequal community participation and potential disparities.

Community Engagement

- The 2UA option could offer slightly improved local representation than a 1UA model due to the smaller geographic area covered, however the areas of 'East' and 'West' contain diverse populations with differing local identities across coastal, rural and urban areas which would require a tailored approach.
- Gravesham and Medway have no Town councils while Dartford only has one, and the majority of the population across these areas live in an unparished area. This means a model that anchors engagement around Town/Parish councils would be inaccessible to the majority of those populations and therefore would struggle to be representative of local identities and needs.

Specific Considerations for 3 Unitary Option

Due to the specific combination of districts within this model, with shared local identities and the coterminosity with other strategic partners, this model would be optimal when considering wider engagement with the community, and most notably, with strategic partners.

Community Engagement

- The 3UA model is roughly coterminous with how other organisations and partnerships organise themselves including Kent Police, HCPs and economic partnerships:
 - The boundaries of Kent Police divisions most closely aligns with this option, however there may be slight variations across boundaries that would need further mapping and consideration:
 - North Division– Medway, Swale, Dartford, Gravesham.
 - West Division – Sevenoaks, Tonbridge and Malling, Tunbridge Wells, Maidstone.
 - East Division – Ashford, Dover, Canterbury, Folkestone, Thanet, Canterbury
 - It is likely that if a move to devolution were to run concurrently or follow local government reorganisation in Kent, that powers for the Office of the Police & Crime Commissioner (OPCC) would be subsumed by the new Strategic Authority/Mayoral Combined Authority and therefore this would align with the three unitary model, providing greater opportunity for collaboration across shared spaces and local identities.
 - The current structure of engagement with the VCSE is via the VCSE NHS representatives group and through the alliances, aligned to one of the four Health and Care Partnerships. The Health

and care partnerships are not contiguous with district boundaries, however the current HCP map most closely aligns with option 1 (3UA); albeit with Faversham split from the rest of Swale, and Swanley and North Sevenoaks paired with Dartford and Gravesham.

- On the basis of the points above, if KCC were to want to align the new unitaries with our strategic partners, this option would be optimal and would implement a more coterminous administrative landscape in which for strategic partners to collaborate in partnership.
- Smaller governance structures in the 3UA model may allow authorities to address community need at a more localised level and allow for better adaptation and responsiveness to community feedback.

Specific Considerations for 4 Unitary Option

It is likely that a 4UA Option would be optimal for maintaining local connection and responsiveness, empowering communities and ensuring their voices are heard.

Community Engagement

- A 4UA model, in which the proposed unitary authorities cover smaller areas and populations, would be 'more local', and should therefore be more reflective of local identities and more conducive to place making and identity building. Smaller, more localised teams could work towards effective communication between residents and local representatives.
- The workstream considered opportunities and challenges for local engagement to exist on a spectrum. An authority representing a smaller area and population would be closer to the residents and communities and would have fewer relationships to manage. In this context (capacity and resource permitting) it is likely that they would be more capable of developing flexible and locally suitable models of engagement.
 - The 4UA model options would therefore be most able to develop and maintain engagement models that were flexible and suitable for local residents, communities and the VCSE.

Specific Considerations for 1 Unitary Option (benchmark)

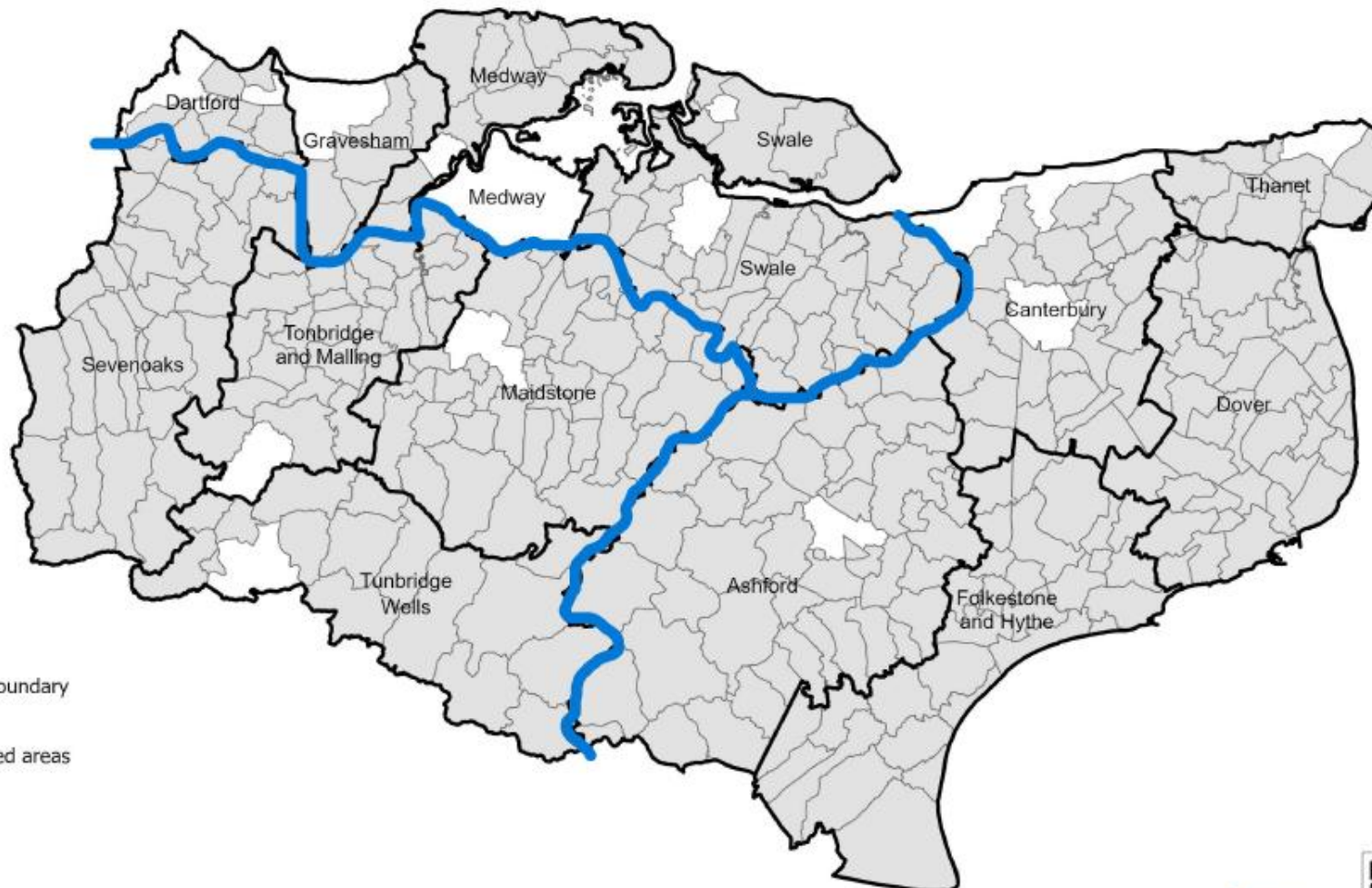
Community Engagement

- A single unitary would cover the whole county area – encompassing urban, rural and coastal areas, areas of deprivation and affluence, and differences in diversity. A blanket approach to engagement would be unlikely to be effective and it would be very challenging for such an authority to develop and maintain flexible and suitable engagement models for all areas.
- However, robust formal and informal engagement mechanisms could mitigate the removal of the district layer of community engagement, while providing a streamlined approach that could reduce duplication and dilution that can be experienced in the current two tier system.
- This model might require consideration of new or enhanced mechanisms to facilitate more localised democracy and decision-making to prevent the Unitary from being too remote – this would require significant resource.
- VCSE organisations will engage with their respective LA for funding/commissioning – larger and infrastructure organisations will be more comfortable engaging with fewer UAs, while small and micro VCSE will also want to engage at a much more local level, and will need to be factored into any local community board arrangements.

Appendix F - Parish and unparished boundary maps

Parish & Non-civil parish boundaries in Kent & Medway 2024

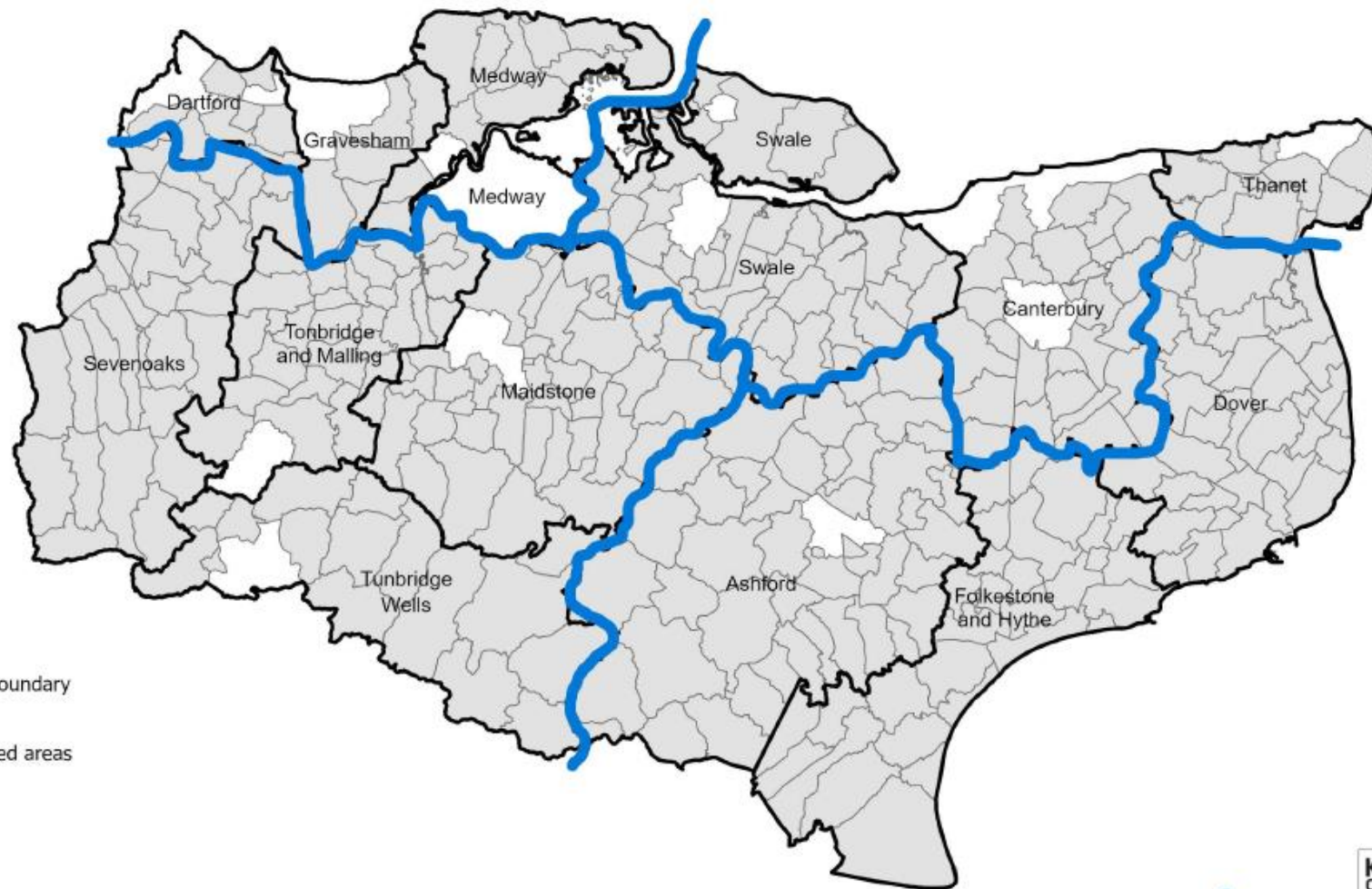
Opt 1 3UA



Source: ONS
Presented by: Kent Analytics, Kent County Council
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Parish & Non-civil parish boundaries in Kent & Medway 2024

Opt 2 4UA

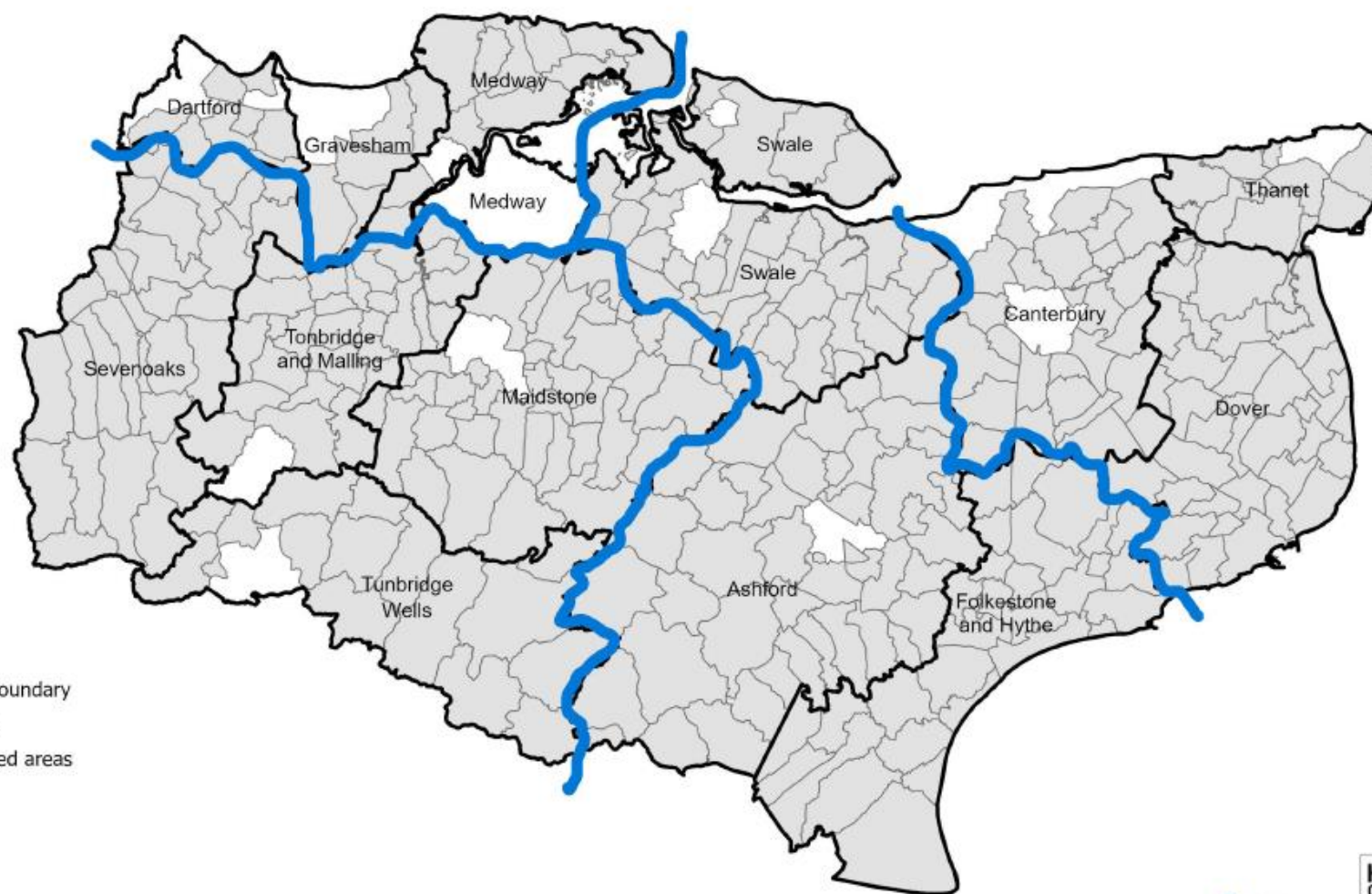


- District Boundary
- Parishes
- Unparished areas

Source: ONS
Presented by: Kent Analytics, Kent County Council
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Parish & Non-civil parish boundaries in Kent & Medway 2024

Opt 3 4UA



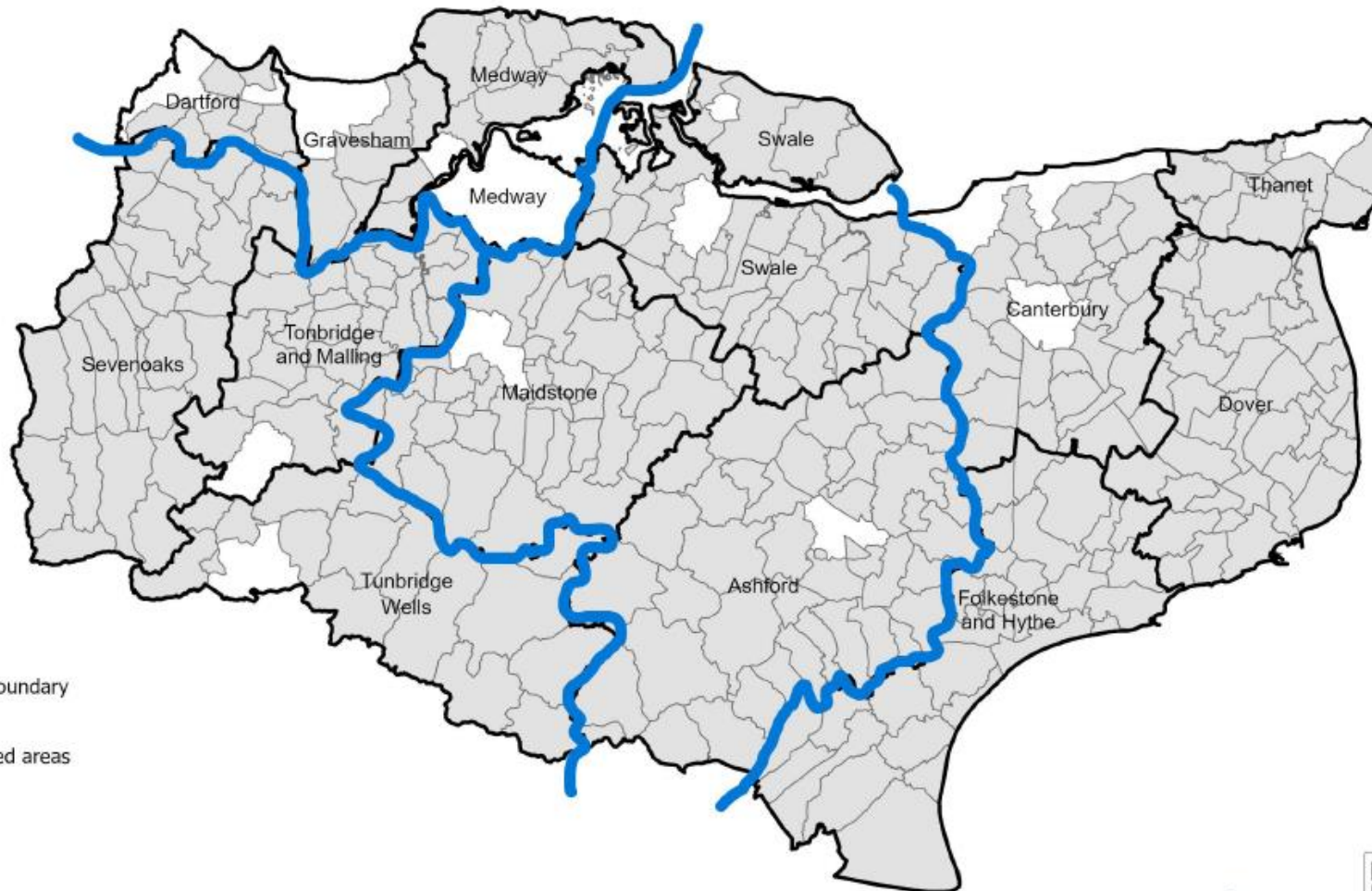
- District Boundary
- Parishes
- Unparished areas

Source: ONS
Presented by: Kent Analytics, Kent County Council
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Parish & Non-civil parish boundaries in Kent & Medway 2024

Opt 4 4UA



- District Boundary
- Parishes
- Unparished areas

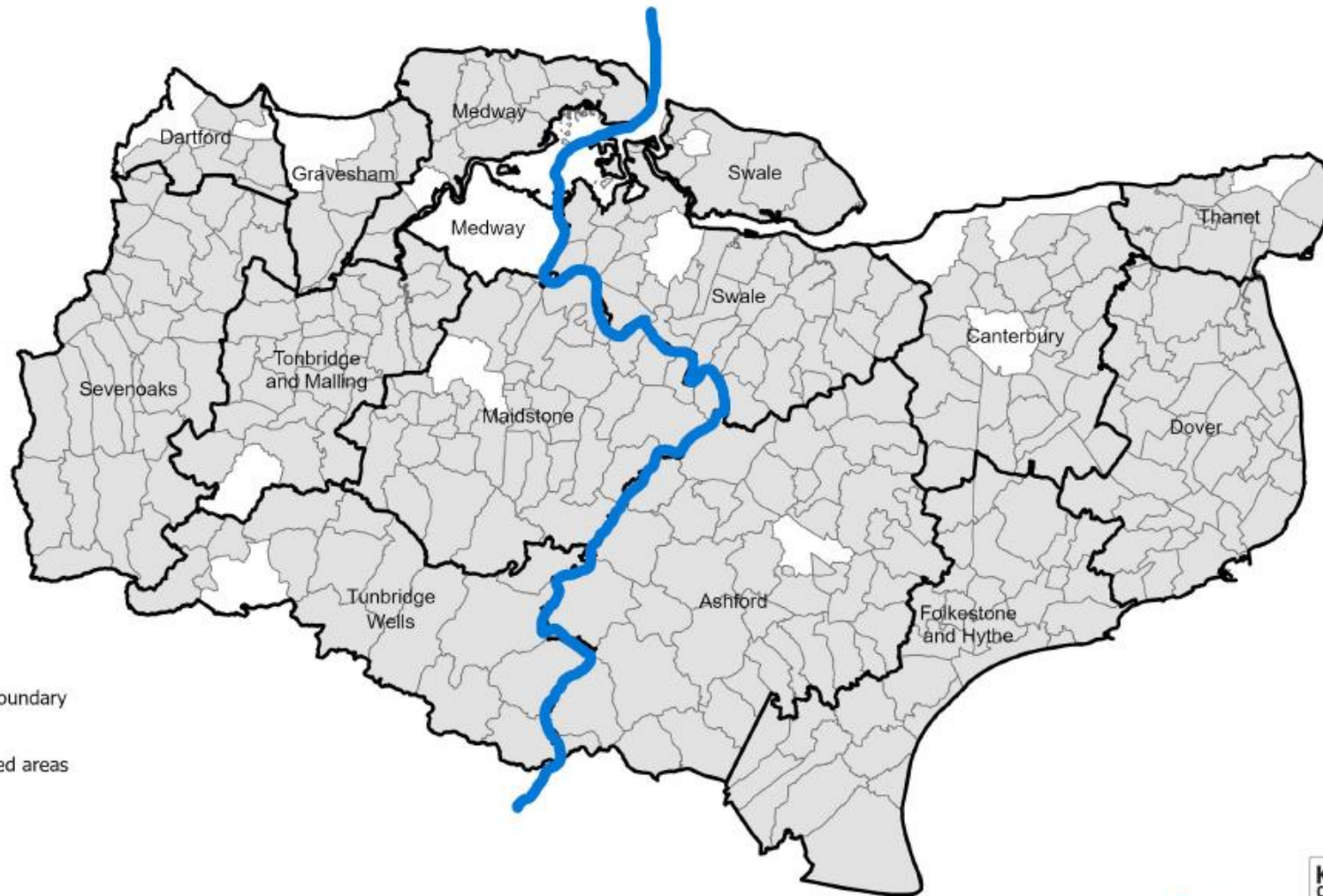


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Parish & Non-civil parish boundaries in Kent & Medway 2024

Opt 5 2UA



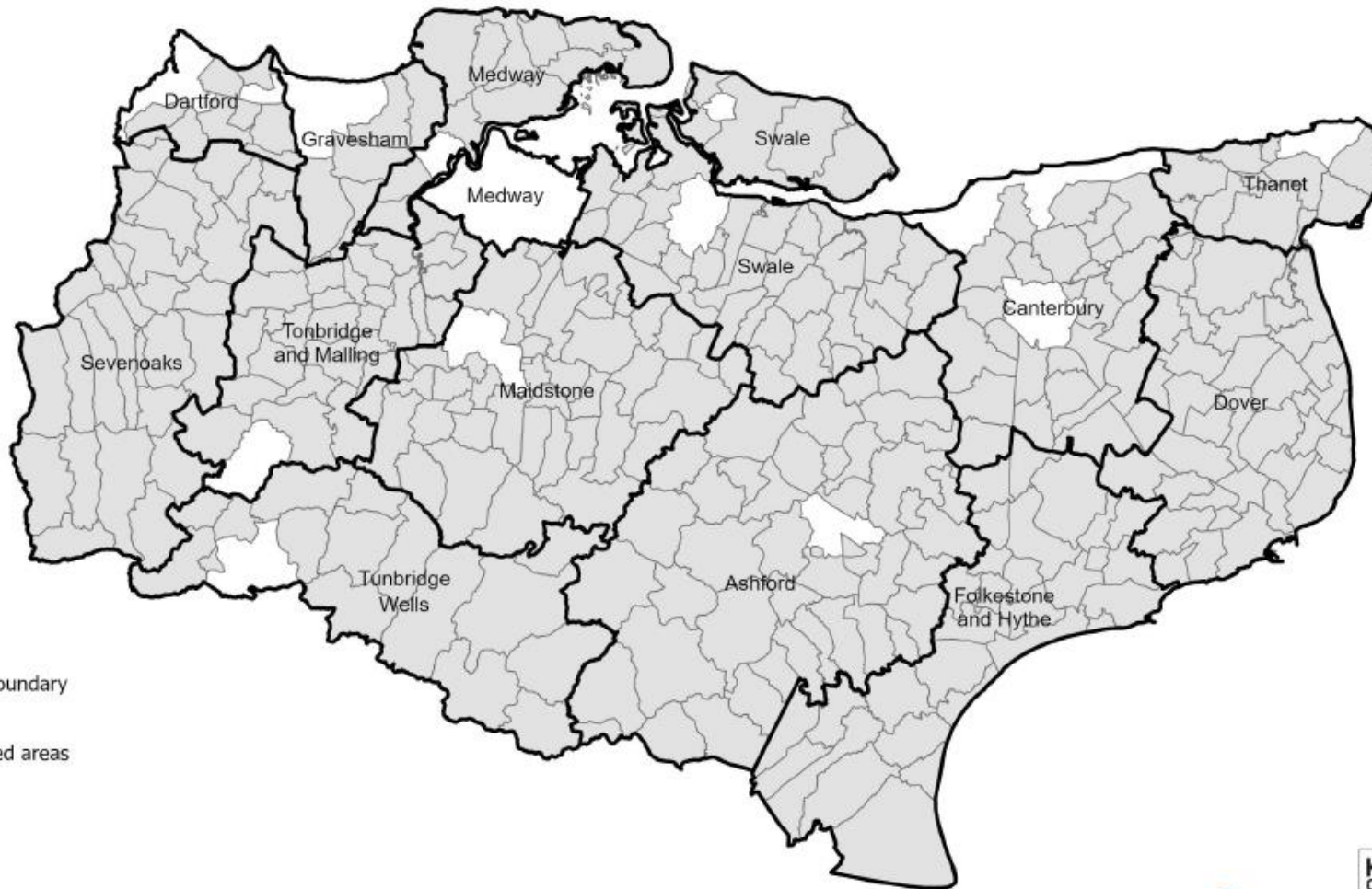
Page 169




Source: ONS
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Parish & Non-civil parish boundaries in Kent & Medway 2024

Opt 6 1UA



-  District Boundary
-  Parishes
-  Unparished areas

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Transformation assessment

1) Introduction

Local Government Reorganisation (LGR) presents an opportunity to review, reset, and fundamentally change the way in which services are delivered to residents across Kent. Transformation in this context means improving service delivery through change and innovation with the same or less resource, to achieve desired outcomes such as better citizens' experience, increased efficiency or productivity, less cost or more streamlined processes (National Audit Report 'Lessons learned: Smarter delivery – improving operational capability to provide better public services', June 2025). Each of the opportunities presented have been framed around the delivery of these outcomes and contribute to the delivery of at least one of them. Equally, risks and challenges have been outlined that reverse or negatively impact the realisation of these outcomes.

Opportunities for Public Service Reform (PSR) have also been considered, whereby opportunities for transformation extend beyond the integration of local government organisations to include other public service bodies such as the police, the NHS, and the Voluntary Community Social Enterprise sector (VCSE), in order to achieve a more holistic and efficient public service model (Spending Review, June 2025).

The key means to achieve the transformation outcomes typically include:

1. Technology, digital transformation (including new insights from the use of data and AI)
2. Business process transformation
3. Service design transformation
4. Service delivery transformation

Given the extensive remit of LGR in Kent, it was agreed that the area of focus should align with key drivers for change, focusing on service areas where LGR presents genuine opportunities to improve outcomes. Critical county council, or upper tier, services identified by government (Social Care, Children's Services, SEND, Public Safety) have been considered, alongside visible services that we know bear great weight in residents' perception of value for money and quality of life.

The agreed areas of focus are as follows:

1. Sustainable public services through market shaping
2. Public services prevention model
3. Planning and the right scale to support delivery
4. Value for money and visible services (quality of life)

2) Summary of findings within the agreed areas of focus:

Key opportunities and challenges were identified for each of the areas of focus and reviewed across each unitary option. Many of the opportunities and challenges are applicable to all model options to varying degrees. The findings for each focus area are outlined below.

2.1 Sustainable public services through market shaping

Local authorities are facing increasing pressure to deliver sustainable, high-quality public services in the context of rising demand, constrained resources, and fragmented governance structures (Local Government Financial Sustainability, Committee of Public Accounts). A key challenge is that the current care and support market does not always align closely with local needs, and councils may face limitations in the tools and capacity available to influence these markets effectively. Commissioning practices are often shaped by immediate pressures, which can make it difficult to plan strategically. As a result, some approaches - such as the use of large block contracts—may not always deliver optimal value or foster innovation, despite efforts to manage resources efficiently.

This section explores how LGR can act as a catalyst for more effective market shaping. By transitioning to unitary authority (UA) models, councils can streamline governance, reduce duplication, and commission people-based services at a more local level. This structural reform offers the opportunity to develop a more responsive, resilient, and efficient market in Kent—one that is better aligned with the needs of its diverse communities.

Key considerations

There are several assumptions that underpin the analysis and ratings as some of the perceived opportunities and risks may not be solely dependent on the number or size of authorities, but rather also on how those authorities are designed, governed, and implemented in practice. These include:

1. Fewer authorities improve efficiency: There is an assumption that reducing the number of local authorities inherently leads to greater economies of scale, reduced duplication, and more efficient use of resources. This includes assumptions about cost savings in back-office functions, senior management, and commissioning processes.
2. Local responsiveness can be preserved through design: There is an assumption that larger authorities are less responsive to local needs and community participation. This could be mitigated through thoughtful service design, local engagement, and strategic planning including through Neighbourhood Area Committees.
3. Larger authorities enable better market shaping: There is an assumption that larger unitary authorities will have greater capacity to shape local markets effectively due to increased financial resources, data access, and strategic oversight.
4. Balanced demand and demographics improve resilience: There is an assumption that fewer, larger authorities create more balanced service demand and demographic profiles across regions, which in turn will enhance commissioning resilience and operational sustainability.
5. Integration and alignment are easier with fewer authorities: There is an assumption that fewer authorities will simplify partnership working and service integration based on the belief that fewer boundaries and more coterminous structures will improve coordination and reduce fragmentation.
6. Larger authorities can avoid commissioning pitfalls: There is an assumption that with the right reforms, larger authorities can avoid defaulting to large block contracts and can instead foster more innovative, outcomes-focused commissioning.

The analysis is structured around three key themes: Economies of Scale, Supply and Demand Balance, and Alignment and Partnership Working.

Economies of Scale

LGR offers significant potential to unlock economies of scale by consolidating services and reducing administrative overhead. Larger unitary authorities can achieve greater buying power, streamline back-office functions, and invest in specialist teams and digital technologies. These efficiencies support more strategic commissioning and enable 'invest to save' initiatives that deliver long-term value. However, there are risks including that larger authorities may lose touch with local needs, and there is a tendency to default to large, inflexible contracts that prioritise ease over effectiveness. Therefore, whilst scale can drive efficiency, it must be balanced with mechanisms that preserve local responsiveness and encourage dynamic commissioning.

The analysis shows that the 2UA model offers a strong balance between achieving economies of scale and maintaining local responsiveness. A single authority (1UA - benchmark) may offer the greatest buying power and administrative efficiency, but it also carries significant risks of over-centralisation, reduced agility, and a loss of local insight. In contrast, the 2UA model enables strategic consolidation - streamlining back-office functions, reducing duplication, and enabling investment in specialist teams and digital technologies - while preserving a degree of local autonomy. Cost modelling for Adults' and Children's Social Care in Kent (2025–2040) shows that scenarios with multiple smaller authorities lead to higher service costs due to increased unit costs for placements and elevated staffing overheads (LGR: Impact on people services, CCN Newton and Adult Social Care - LGR People-Based Services Interactive Model - Power BI Report).

Larger authorities can also support more sophisticated commissioning through access to richer data, predictive analytics, and specialist expertise. This enables a shift from reactive service delivery to proactive market shaping. For example, the ability to invest in AI-driven care assessments or integrated brokerage services can improve efficiency and outcomes.

Additionally, the 2UA model retains sufficient scale to support invest-to-save initiatives, such as in-house residential care provision, which may be unviable in smaller authorities. While the 1UA model offers the highest financial capacity for such projects, the 2UA model still provides a strong platform for strategic investment without the governance and responsiveness risks associated with a single, very large authority.

Supply and Demand Balance

A key benefit of fewer, larger authorities is the ability to better balance service demand and market capacity across a broader geography. This is particularly important in areas like Kent and Medway, where demographic and service needs vary significantly. Larger unitary models help equalise demand for adult and children's social care and housing support, reduce disparities in deprivation and age profiles, and optimise the use of care and Special Educational Needs and Disabilities (SEND) placements. This balance enhances operational resilience and allows for more strategic resource allocation. In contrast, more fragmented models (e.g. 3 or 4UA) risk creating uneven service pressures, inefficiencies, and reduced flexibility to respond to demand fluctuations.

While the 1UA model offers the most complete equalisation of supply and demand - particularly in areas like homelessness and SEND - the 2UA model still achieves a high degree of balance without the operational risks of over-centralisation. For example, it allows for more even distribution of care placements and better alignment of supply and demand across the region, reducing the risk of inflated unit costs or out-of-area placements. The expected increase in demand for SEND services between 2025–2040 is 28% in Kent and 47% in Medway (LGR:

Impact on people services, CCN Newton) - highlighting the need for a model that can balance and manage such disparities across regions.

Balanced demographics also support long-term sustainability by enabling more predictable commissioning and reducing service pressure. The 2UA model creates a more stable environment for providers, supporting market resilience and reducing the volatility that can arise from fragmented governance.

Alignment and Partnership Working

Effective market shaping depends on strong alignment between services and robust partnership working. LGR can simplify governance structures, reduce fragmentation, and support more consistent service standards. Fewer authorities make it easier to coordinate with key partners such as the NHS, police, and the voluntary sector, enabling more integrated and person-centred care. Standardised commissioning practices also reduce inefficiencies and improve the experience for providers. However, increasing the number of authorities can lead to fragmented planning, inconsistent delivery, and weakened collaboration - particularly in safeguarding and joint commissioning. A more unified structure enhances the potential for shared projects, data sharing, and long-term strategic planning.

While the 1UA model offers the most coterminous alignment with partners like the Kent and Medway Integrated Care Board (ICB) and Safeguarding Boards, it also risks becoming too large and bureaucratic to maintain effective local relationships. The 2UA model strikes a balance - enabling strategic alignment and joint commissioning while preserving the ability to engage meaningfully with communities and local providers.

Standardised commissioning practices under the 2UA model reduce inefficiencies and improve the experience for providers, who often operate across multiple authority boundaries.

Moreover, the 2UA model supports improved outcomes in adults' and children's social care. Evidence suggests that larger authorities are more likely to achieve good or outstanding Ofsted and CQC ratings, though this must be balanced with the need to retain the best aspects of current service delivery. The 2UA model allows for this continuity while enabling system-wide improvements.

Highest Rated Option

Option 5 (2 unitary authority model) appears to offer the most balanced and effective approach to achieving sustainable public services through market shaping. It combines many of the efficiency benefits of a single authority - such as economies of scale, stronger commissioning power, and greater capacity for strategic investment - while maintaining a level of local responsiveness that is critical for tailoring services to diverse community needs. This model supports more balanced service demand, demographic distribution, and care market and SEND capacity across Kent and Medway, which are essential for resilient and responsive service delivery.

Crucially, the 2UA model also mitigates the risks associated with both extremes: it avoids the over-centralisation and potential loss of local insight seen in the 1UA model, and it reduces the fragmentation, duplication, and market instability risks that are more pronounced in the 3UA and 4UA options. It enables more consistent partnership working, standardised commissioning, and integrated planning - key enablers for shaping a care and support market that is both efficient and responsive to future needs.

2.2 Public services prevention model

Demand for Adults and Children's social care services continues to rise, both at a national level and within Kent. Along with the rising demand is the rising cost of assessing need and delivering interventions. It is recognised that these interventions are frequently delivered when a situation reaches crisis point, i.e. services are reactive and often unsustainable and not well co-ordinated with partners (such as health, police and education) and the VCSE. This reactive approach not only strains limited resources but also fails to provide timely support to those in need, leading to a cycle of escalating issues and increased pressure on services. By focusing on prevention, we can address issues before they escalate, leading to better outcomes for individuals and more efficient use of resources, including improved data linkages and population needs insights between partner agencies (The Future of Prevention Programme: Exploring how to deliver proactive prevention at scale, Interim update December 2024, Newton, LGA, ADASS and Atlantic collaboration).

Local Government Reorganisation (LGR) presents a unique opportunity to address these challenges through unitarisation. By bringing together services such as housing, leisure, education and social care under a single unified structure, LGR simplifies integration with other partners and creates new opportunities for prevention. This reorganisation allows for a more proactive approach, enabling early intervention and better coordination of services. As a result, it can help to reduce the demand on crisis services, improve outcomes for individuals and families, and create a more sustainable and efficient system overall (Government Spending Review 2025, English Devolution White paper: Power and partnership: Foundations for growth, December 2024).

Key considerations:

1. As indicated in the previous section (3.1 Key Considerations), there are a number of assumptions that underpin the following analysis; namely that larger authorities improve efficiency, will have improved resilience due to more balanced demand and demographics, and will have easier partnership integration and alignment. It is also assumed that larger authorities are less responsive to local need and community participation.
2. Analysis of the different unitary options will need to consider the balance between the benefits larger unitary areas offer in terms of managing uneven demand across a geographical area, maintaining sound safeguarding processes, strategic capacity versus the benefits of more local integrated working with partners and the potential ability to respond more quickly to changing need.
3. The findings assume that there is no Mayoral Strategic Authority (MSA), and each unitary area operates independent of the others. If there were to be a MSA, then many of the risks identified for 3 or 4 unitary options may be mitigated. In addition, Government is considering the potential for other policy and service delivery solutions for adults' and children's social care through vehicles such as social partnership or similar other vehicles.
4. The formation of a Children's Trust in parallel with a unitary model could be a mitigating action for disaggregation of current children's and young people's services. However, this approach has the potential to add additional complexity to the system and would reduce the financial benefits associated with reorganisation. It would also require additional leadership posts and governance arrangements.

5. There is a need to identify the barriers currently in place which prevent effective local/neighbourhood integrated partnership working, and what enablers are required so that LGR can be a real catalyst for change and transformation.

The analysis for the different unitary options has been considered under three broad themes: Strategic Capacity, Partnerships and Integration, and Innovation and Investment.

Strategic Capacity

A 1UA may better manage the expected growth in demand for social care services, particularly in areas with higher predicted increases, and allows for both a broader financial base to withstand demand surges, and in terms of managing staffing resource. The size of a 1UA enables effective strategic oversight while maintaining local knowledge, ensuring services can adapt to the diverse needs of communities. This is also applicable for education settings and meeting SEND need as a larger area is better placed to facilitate school to school collaboration including federations, trusts, and teaching school alliances, and makes it easier to share best practices and innovations across a broader network. A 1UA enables a more cohesive, area-wide strategy for crime prevention and community safety, and enables joint planning and rapid response for emergency services. A larger unitary area may enable funding for specialist teams to further support the prevention agenda e.g. homelessness, Unaccompanied Asylum-Seeking Children (UASC) etc.

However, it may be considered that a 1UA is too large an area (and population) size to maximise efficiencies, and therefore a 2UA might be more feasible.

A 1UA may have greater capacity to have support functions such as data collection and reporting, analytics, audits, quality assurance and practice development to provide strategic oversight and insight into where to target prevention resource, identify emerging trends and patterns, and forecasting and predicting need. There may be more scope for area-wide data sharing agreements with strategic partners to really understand and inform how to best address needs of residents. All of these functions should help in delivering the right prevention services to the right people in order to drive down longer-term demand into social care.

Moving to a 2, 3 or 4UA increases the risk of fragmentation and reduction in strategic capacity which may impact the ability of an area to identify and meet the needs of particular vulnerable groups. Conversely, working to a smaller geographical area such as a 3 or 4 unitary authority model may make it easier to identify needs at a more local level and to work with communities and partner agencies (particularly the VCSE) to design preventative solutions.

Partnerships and Integration

A 1UA may be best placed to facilitate a whole system approach, improving coordination between housing, social care, education, leisure and community services, ultimately enhancing the quality of life for residents. A 1UA may ensure more consistent service delivery, service offer, referral and thresholds, policies and pathways, meaning that residents experience less of a 'postcode' lottery in terms of what support is available and how to access it. However, as noted above, it may be that a 1UA is too large an area and population size to be efficient and so a 2UA might be a more manageable option.

Having multiple unitary areas moves away from a strategic whole system approach to partnership working, and instead, increasingly facilitates closer local links with partner agencies and the VCSE. This may facilitate a more responsive, agile approach to prevention delivery at an operational level. The smaller 3 or 4 UA may enable even more effective local

collaboration and co-design with communities, to deliver services in a timely manner and result in more immediate impact.

Innovation and Investment

A 1UA would be a large geographical area and population size and consequently may have more scope to leverage central government, secure funding and support for projects and initiatives. It may be better able to drive change and deliver savings by reducing duplication both in services, and in back-office support functions. A 2UA may have a similar leverage and also present the opportunity to streamline 2 tier processes, however as the number of unitary areas increases, this opportunity reduces.

1UA offers possible savings to unified Director Children's Services and Director Adult Services roles and may best support workforce recruitment, development and retention across a wider area. As the number of unitary areas increases, there may be challenges around the pool of people available and recruitment to senior leadership positions, and around wider workforce retention, with areas in competition with each other.

Highest Rated Option

Considering the opportunities and challenges presented by the different unitary authority models, Option 6 (1 unitary authority model - benchmark) may be the optimal approach for delivering public services prevention transformation. Based on the assumptions noted above, larger unitary authorities offer greater strategic oversight, resource and capacity to manage fluctuations in demand, and drive change and transformation. It would also build on the existing good work of both the Children's and Adults' Safeguarding Boards which cover both Kent and Medway. Furthermore, evidence and modelling suggest that higher CQC and Ofsted outcomes are more likely for larger authority areas (LGR: Impact on people services, CCN Newton).

Whilst the large geographical area and population size of a 1 unitary option may suggest that community partnership and resident co-production might be compromised at a local scale, LGR offers the opportunity for transformation and a fundamental reset to ensure that a bottom-up approach to prevention, integrated working and neighbourhood community solutions is prioritised within the larger unitary authority. A 1 unitary model may have the most resource and capacity to deliver and support this more local way of working.

2.3 Planning at the right scale to support delivery

The problem statement identifies a core issue, namely that planning in Kent is not currently at a sufficient scale to be strategic, with an insufficient focus on infrastructure and poor integration with wider public services. The existing two-tier system (county and district councils) leads to fragmented planning, inefficiencies, and missed opportunities for coordinated growth. Planning is too localised to effectively address county-wide needs, infrastructure planning is fragmented and underemphasised, and planning is not aligned with social care and other key public services like health and policing.

LGR presents a significant transformation opportunity to address these challenges by moving to a unitary model, with authorities that operate and enable strategic planning at scale, integrated planning of housing, transport, and infrastructure, making better use of developer contributions and meeting housing and infrastructure needs more effectively, and an enhanced ability to attract external funding and investment, supporting economic development and regeneration through more coherent, simplified, and scalable governance and decision-making. Planning

policy can be integrated with service policy across service delivery such as social care and other public services (e.g. policing and health etc.) to enhance coordination across sectors.

Key considerations

1. Simplified administration: With fewer entities involved, a 1UA or 2UA model reduces coordination complexity and the risk of overlapping responsibilities.
2. The process of reaching agreement to manage issues such as housing need and demand, planning, and wider infrastructure planning, financing and delivery in a coordinated fashion across a broader functional economic area would be more complicated between multiple authorities. The ability to communicate as a coherent voice for the place is important when trying to reshape a whole system. This coordination can help new unitaries get into the position of being seen as equal players with large investors and government.
3. The benefits of strategic growth and planning can be maximised when delivered at scale across a wider area and potentially attract more inward investment.
4. Key risks for a 1UA or 2UA model are around: loss of local nuance, centralised bottlenecks, transition complexity.
5. Key risks for a 3UA or 4UA model (and some apply to the 2UA model too) are around: cross-boundary coordination and need for strong mechanisms to manage aspects such as shared infrastructure and transport corridors, potential for inconsistent priorities and risk of diverging visions between two or more unitaries (e.g. differing approaches to sustainable transport), duplication of effort, fragmentation, weaker strategic capacity and influence and reduced leverage with key regional/national partners/stakeholders, inconsistent delivery (misaligned priorities, budgets, timetables), complex governance.
6. Key advantages for a 1UA and 2UA model: the impact of scale on cost and place, strategic capacity and influence, planning at a larger scale can enable effective place-shaping, reduced fragmentation, supporting more consistent service standards and improved oversight.
7. Key advantages of a 3UA and 4UA models: local responsiveness and tailoring, scope for innovation and easier to test pilots etc., closer community engagement, locally focused decision making (PwC – Local Government Reorganisation in Kent: An interim proposal).
8. A Mayoral Strategic Authority (MSA) could provide a unifying strategic layer across all LGR models, by coordinating county-wide planning, housing, transport, and infrastructure priorities; while a 1UA model would naturally align most closely with the MSA's strategic remit through a single point of accountability, the 2UA model could support effective collaboration through joint governance mechanisms, whereas the 3UA and 4UA models would require more complex inter-authority frameworks to ensure consistent spatial strategies and infrastructure delivery across boundaries. However, it is important to note that currently government are not willing to offer devolution via a MSA to Kent under a single unitary model and it is unclear whether they would accept a 2 unitary model, so the benefits presented by these model options in regard to devolution application are theoretical whilst the government position remains as is.

The analysis for the different unitary options has been considered under three broad themes: Strategic Planning and Place-Shaping at Scale, Economic Alignment and Growth, and Improved Service Integration.

Strategic Planning and Place-Shaping at Scale

The opportunities under this theme highlight the transformative potential of Local Government Reorganisation (LGR) in delivering more integrated, efficient, and sustainable land, housing, and transport planning by coordinating infrastructure and investment decisions across a broader geography, underpinned by the ability to set a unified vision through aligned spatial strategies and Local Plans (Planning Advisory Service - *Joined Up Thinking in Uncertain Times: Links between Strategic Planning and Transport*). Opportunities include aligning land use, housing, and infrastructure planning to create better connected communities, and streamlining governance. These opportunities would also mean faster development, better access to funding by simplifying engagement with regional and national stakeholders, and the ability to influence these agendas more effectively.

In comparing the different LGR models, the available evidence suggests that larger unitary structures can better support these ambitions (PwC: *Evaluating the importance of scale in proposals for local government reorganisation*). A single unitary model potentially offers the greatest potential for consistency and strategic alignment but may risk being too distant from local nuances. Conversely, models with more unitaries (such as three or four) can retain local responsiveness while, compared with the current fragmentation of the two-tier system, could create scale through aggregation. The 3UA and 4UA models will need shared or joint planning frameworks that can be tailored to areas' needs while experiencing a decreased degree of economies of scale, which presents a higher risk of fragmentation and slower coordination. A 2UA model offers a balanced opportunity for strategic planning and place-shaping as it combines the benefits of scale - enabling region-wide coordination and investment - with the ability to maintain a higher degree of local responsiveness comparing to the 1UA model. This model would require collaborative governance and integrated planning across boundaries but is not as complex as managing across 3 or 4 sets of borders.

A 1UA model may be the most advantageous structure for strategic planning and place-shaping at scale as it offers the clearest path to a unified spatial strategy and a single Local Plan, integrating strategic and local policies.. This model would also enable consistent decision-making and long-term investment planning. A single authority is best placed to coordinate transport and land use and manage environmental assets holistically, whilst also simplifying the planning process and access for developers with a greater potential to accelerate infrastructure delivery.

Economic Alignment and Growth

The opportunities under this theme focus on leveraging LGR to unlock strategic, county-wide economic development, and drive economic regeneration, attract investment, and streamline economic development service delivery. By aligning planning, infrastructure, and growth strategies, unitaries can create a more compelling environment for inward investment and business development. Opportunities include pooling local business rates for reinvestment, managing housing and property assets strategically, and enhancing economic development services through unified policies and specialist recruitment. These changes would enable the new unitaries to respond more effectively to regional economic needs.

A single unitary model offers the most comprehensive platform for aligning planning, infrastructure, and growth priorities, enabling Kent to attract greater investment and integrate more effectively with London-linked development. This model simplifies the pooling and reinvestment of business rates, aligning financial resources with strategic growth plans, and also streamlines engagement with national and regional partners, improving Kent's

competitiveness. The 1UA model would enable the most simplified planning processes - such as Section 106 agreements and the Community Infrastructure Levy (CIL) - by consolidating authority, reducing negotiation complexity, and ensuring transparency and efficiency for developers and communities alike (Grant Thornton - Learning from the new unitary councils). It also allows for a county-wide infrastructure strategy that equitably distributes developer contributions across both high-growth and underinvested areas.

The 2UA model offers a balanced approach to maximising the opportunities under this theme. It provides sufficient scale to align economic strategies and attract investment while maintaining a level of local responsiveness that supports tailored economic interventions. This model allows for strategic pooling of resources and coordinated infrastructure planning across a broader geography, without the potential disconnect that might arise in a single unitary model. It also facilitates more agile decision-making and service delivery compared to models with three or four unitaries, which may face coordination challenges. In addition, the 3UA and 4UA models risk inconsistent negotiation and fragmented infrastructure delivery as services may be duplicated, potentially creating inconsistent advice for developers, with an increased risk of differing planning standards. Overall, the 2UA model strikes an effective balance between strategic oversight and local economic responsiveness, making it well suited to deliver the potential of this theme.

Improved Service Integration

The opportunities under this theme highlight the potential of LGR to deliver more cohesive, resident-focused public services. For example, by aligning affordable housing with social care, education, job training, and health services, councils can provide wraparound support that addresses both immediate and long-term complex community needs holistically (Home Sight – Affordable Housing and Social Services Integration). This approach fosters economic stability, social inclusion, and better health outcomes by reducing barriers to support and streamlining service access.

Integration also extends to areas such as environmental and heritage services, offering a single point of access and reducing duplication. The use of single or shared platforms, AI, and consistent design principles across new unitaries can lead to better delivery of services and cost savings. Other operational efficiencies extend to having fewer or a unified housing service which can reduce administrative costs, streamline maintenance and repair systems, and implement a centralised planning system. These efficiencies not only save money but also improve the user experience for residents and partners. Simplified administration further enhances coordination across key areas like planning, education, and waste management.

The 1UA and 2UA models are best positioned to maximise the opportunities under this theme. The 1UA model enables full integration of services under one governance structure e.g. housing strategy and delivery, eliminating fragmentation and ensuring consistent standards across the county. A single unitary structure would also provide optimal authority and oversight to effectively plan and deliver infrastructure that facilitates and supports more innovative service delivery models e.g. the development of multi-agency hubs and co-located services and greater collaboration with external partners, given the unified interface. While models with multiple unitaries may retain local nuance, they risk duplicating systems and complicating coordination. This means that in the 3UA or 4UA models, there is a greater risk of fragmented commissioning and inconsistent service models (e.g. for wraparound services in housing), and that of divergence in priorities and disjointed delivery while also potentially facing higher costs and complexity in aligning systems and sharing data.

Highest Rated Option

Based on the analysis of the opportunities and challenges under the three themes—Strategic Planning and Place-Shaping at Scale, Economic Alignment and Growth, and Improved Service Integration - Option 6 (1UA - benchmark) and Option 5 (2UA) models emerge as the most effective options to maximise the opportunities identified under this problem statement. Both models highlight the potential that scale has to positively impact cost and place-shaping, with the 1UA model offering a clear path to a unified spatial strategy and Local Plan, enabling consistent decision-making, streamlined governance, and long-term investment planning. The 1UA model also provides a stronger platform for aligning economic development with infrastructure and planning, simplifying engagement with national stakeholders, and enhancing Kent's competitiveness. In terms of service integration, a 2UA model presents similar opportunities to the 1UA model, however a single authority structure allows for fully joined-up commissioning and delivery, reducing duplication and improving access to wraparound support services. The 2UA model offers a more balanced alternative as it maintains some local responsiveness comparing to a 1UA model, however it lacks the full coherence and efficiency gains achievable under a single authority. Therefore, the 1UA model is better positioned to deliver scale, consistency, and strategic alignment in relation to planning.

2.4 Value for money and visible services (quality of life)

The underfunding of local government is well documented, with many local authorities struggling to balance multiple competing priorities within the limited budget they have available. For example, over half (60%) of KCC's budget is spent on Adult and Children's support services, while the remainder is spread very thinly across multiple service areas (KCC budget webpage). This means a considerable amount of council resource (60%) is being used to support a very small cohort of people (approximately 3% of the Kent population are in receipt of adults' or children's social care). This imbalance, caused by growing demand in people services and continued under investment in visible place services (for example, by comparison only 6% of the KCC budget is put towards waste services and highway maintenance), contributes to residents' negative perception of quality of life and value for money from their local councils. Essentially, residents can feel as though they are paying more for less. Whilst the extent to which local government reorganisation can help resolve this complex issue is questionable (especially in the absence of wider funding reforms or devolved powers), unitarisation does provide an opportunity for councils to reassess the way in which they deliver services to meet the needs of all residents whilst delivering better value for money.

Key considerations

1. Universal services: For the purposes of this report, we have narrowed the list of universal services to include the following:
 - Waste services
 - Highways maintenance, specifically potholes
 - Community services and use of assets

These services were chosen as they are consistently referenced in budget consultation reports as areas where residents would welcome further investment (N.B. transport is a top priority for residents but has been omitted as meaningful change is limited without devolved powers).

2. Value for money: When assessing value for money, this has been looked at from the perspective of the resident. Ultimately, residents want more money to be invested in

services that will make a tangible improvement to their everyday lives, especially as there is a feeling that if you pay council tax you should personally benefit from services. However, this clearly must be balanced against what the council as a whole considers to be value for money, as it attempts to ensure multiple different services remain financially viable whilst also fulfilling its legal duties (popularity vs practicality).

3. **Financial sustainability:** It is likely that smaller authorities would lack the financial resilience and strategic capacity to be able to invest in universal provision whilst also delivering sustainable social care services.
4. **Commissioning practices:** There is a risk that larger authorities may default to commissioning large block contracts. Commissioning in this way may sacrifice innovation for scale, with less flexibility built into the commissioning process. More localised commissioning as part of a three or four unitary model may lead to better service design and delivery, ultimately leading to better outcomes for residents.
5. **Maintaining the status-quo:** There is a risk that the 1UA or 2UA models may effectively create large social care authorities, with less focus given to the design and delivery of local, place-based services. This may end up perpetuating the existing issue of council resources being predominantly used to support people who draw on care and support services at the expense of investment in more universal services for all residents. LGR offers the opportunity to fundamentally redesign the way in which services are delivered to help improve the resident experience, and so these models could be criticised as not being ambitious enough or for simply offering more of the same.
6. **Local responsiveness:** It is assumed that smaller authorities are best placed to fully realise the benefits of local service delivery and place shaping, whilst larger authorities may be less responsive to local need and community participation (especially in the absence of District Councils).
7. **Public Service Reform:** Aligning council services with other public sector bodies presents opportunities for public service reform. This is most effective where public service boundaries are coterminous. Working with key partners such as the NHS and the Police, councils can help improve outcomes for residents, reduce duplication across public services, deliver better value for money, and respond more effectively to the complex needs of communities.
8. **Devolution:** The findings assume that there is no Mayoral Strategic Authority (MSA) and each unitary area operates independent of the others. There is a risk that dividing the county into multiple unitary authorities may undermine Kent's collective voice on key strategic issues such as Unaccompanied Asylum-Seeking Children (UASC) and Operation Brock – issues which we know are particularly important to residents and which will influence their opinion on their local council.

The following analysis is based around several key themes: Clarity and Responsiveness, Innovation and Investment, Universal Services, Building on local Strengths and Assets, and Public Service Reform.

Clarity and Responsiveness

Irrespective of which model is adopted, unitarisation should make it far easier for residents to access information and support. Under the current system, residents are often redirected from different tiers of local government depending on the issue they have raised, and this transfer of responsibility can sometimes feel deliberately unhelpful, especially if the matter is urgent.

Having a single tier of local government should make it easier – and quicker – for residents to find what they are looking for, with all information held in a central location.

As part of a unitary structure, residents would also have a single point of contact via their elected Member to raise concerns and to suggest improvements to local services. This system should help expedite communication between residents and their local representative, leading to more efficient responses to issues which matter to local people. Indeed, ‘being heard’ and the speed with which local concerns are addressed is often intrinsically linked to the public’s perception of how effective their council is and whether or not they are receiving value for money.

There may also be an opportunity as part of LGR to reset the relationship between public servants and residents by bringing local people closer to decision making (perhaps through local area committees or neighbourhood citizen panels), helping to empower residents who may otherwise feel disengaged.

Innovation and Investment

Unitaries will have to balance investment in local, place-based services with the need to provide sustainable adults’ and children’s social care services. Larger authorities should be better equipped to balance these competing priorities, allowing them to invest in local initiatives whilst also managing demand for statutory services. Conversely, the increased disaggregation and transition costs associated with the move to smaller authorities (4UA model) may limit the amount of money that can be invested in front-line/visible services, potentially rendering this model financially unviable from the outset.

Universal Services

As demand for people-based services continues to rise, there is less scope for councils to invest in universal services for all residents. These types of services are highly visible and tangibly impact residents’ everyday lives – the most notable examples being waste services and road maintenance. There is an opportunity through LGR to fundamentally change the way in which these services are delivered to achieve better outcomes for residents. For example, aggregating waste collection and waste disposal services as part of a unitary model should help streamline the entire waste management process and should generate efficiency savings by reducing transportation and labour costs through economies of scale (it is important to note that whilst waste collection and disposal services could be aggregated under any model of unitarisation, the benefits of scale and efficiency would be maximised under a single unitary model). Having an integrated waste collection and disposal service would also help simplify the process for residents and demonstrate better value for money. The issue of littering, fly-tipping, and general environmental cleanliness is also particularly important to residents. There is an opportunity through unitarisation for closer alignment between all of these services, as well as the development of a single reporting tool for faults such as littering, fly tipping, uncollected bins, potholes etc., which should hopefully lead to a more coordinated and responsive system for residents.

Another key concern for residents over recent years has been road maintenance. Management of the highway asset base is highly visible (especially potholes) and is an important issue to residents who have expressed dissatisfaction with the way this is managed through the current model. It is possible that highway maintenance would improve as a unitary responsibility, especially if smaller authorities (3 or 4UA model) are afforded greater flexibility to commission local providers in a more responsive local market. If smaller unitaries are able to manage these

markets effectively, then they should be able to target problem areas more rapidly without a significant increase in costs.

Building on local Strengths and Assets

Smaller authorities are perhaps best placed to fully realise the benefits of local service delivery and place shaping. Under a 3 or 4UA model, councils should have a better understanding of their local population and should be able to utilise their asset base more effectively, exploring service delivery options such as co-location and multi-agency asset use. Similarly, smaller authorities should be able to work more closely with the local voluntary and community sector. The current VCSE landscape across Kent is both diverse and complex, with thousands of different groups of varying size and type existing across the county, making it difficult to coordinate services at scale. Working across smaller geographical footprints, councils could fully harness the potential of the sector to help deliver services that will have a positive impact in local communities. Working closely with local community groups can also help maximise social value for residents, with little amounts of money often going a long way. Smaller authorities are also best suited to working at neighbourhood level, which appears to be the direction of travel under the current Government.

Public Service Reform

Local Government Reorganisation can act as a catalyst for Public Service Reform by providing opportunities for new unitary authorities to align services with key partners. For example, under the 3UA model, the proposed unitary boundaries are broadly coterminous with the geography of other public sector bodies, such as Kent Police Command Units, Hospital Trusts, and Health and Care Partnerships. This particular model would therefore allow partners to build on established relationships and ways of working to accelerate tailored, community-based integration and reform including on crime and community safety and health and social care. Aligning with current service delivery boundaries would also help minimise disruption for wider public services during the transition period and provide the most efficient way for partners to work together in the longer-term to deliver better outcomes for residents.

Highest Rated Option

Option 1 (3UA) model appears to offer the best balance between scale and flexibility, where authorities are large enough to be able to deliver sustainable social care services across manageable geographical footprints, whilst also small and agile enough to be able to respond to local need and deliver effective place-based services. Working at a smaller scale, authorities can focus on what matters most to local people and respond to local issues more effectively, helping to improve quality of life and build trust and confidence in public services. Working at this level should also make it easier to harness local knowledge and expertise to deliver tailored services that address specific needs, whether that be through better use of assets, more joined-up working with partners, a stronger relationship with the VCSE, or through closer engagement with residents. This local knowledge can then be utilised at a more strategic level to drive improvements across the entire region, using data and evidence to inform future policy considerations.

The 3UA model also offers several opportunities for public service reform. For example, the Police Command Units across Kent are coterminous with the boundaries of a potential West, East, and North Kent unitary configuration. This should enable closer partnership working between unitaries and the local police force by coordinating efforts to tackle crime and reduce antisocial behaviour. For example, North and West Kent could focus on tackling county lines

issues whilst East Kent could prioritise border security – issues which we know are important to residents.

The 3UA model also provides unitaries with the opportunity to work more closely with the NHS. This model aligns well with existing Health and Care Partnership footprints whilst all of the major hospital trusts in Kent fit into the three unitary authority areas (Maidstone and Tunbridge Wells NHS Trust in the west, Dartford and Gravesham NHS Trust and Medway NHS Foundation Trust in the north, and East Kent Hospitals University NHS Foundation Trust in the east). This model of unitarisation should therefore enable closer joint working between health and social care teams, particularly around hospital discharge (this is already happening under the current system but could be accelerated under this model).. This should help improve the citizen experience as residents often report negatively on the lack of joined up care they receive from different public services. It is also important to note that the NHS Kent and Medway Integrated Care Board have indicated that their preference would be to move to a three unitary model if LGR is to be progressed.

Lastly, this option makes the most sense geographically as it groups districts with similar socio-economic profiles, allowing each authority to focus on local priorities. This configuration also broadly reflects sub-regional identities, with most residents considering themselves to be part of West, East or North Kent. Ultimately, residents need to feel connected to their local area and need to be reassured that their council tax is being spent on local services.

3) Summary of cross-cutting opportunities and challenges across the 4 problem statements by Option:

3.1 Specific considerations for Option 1 (3 unitary)

Opportunities	Challenges
Less disparity in deprivation levels comparing to a 4U model	Less specialised teams/roles/services comparing to 1U or 2U models
Optimum balance of council tax receipts and business rate revenues comparing to all other unitary models (more equitable spending power)	Less capacity for invest to save projects comparing to 1U or 2U models
Competitive environment for providers	Less balanced service demand comparing to 1U or 2U models
Greater ability to balance scale with local flexibility	More disparity in deprivation levels comparing to 1U or 2U models
More localised expertise and service delivery	Less balanced care market capacity comparing to 1U or 2U models
More localised responses to demographic and economic needs	Increased risk of instability in care markets impacting on the capacity and quality of commissioning
Greater agility in service delivery and faster implementation of policies	Risk of less data sharing and integration
Closer local level relationships with partner organisations and alignment of services	Increased risk for demand imbalance between the geographies of a 3U
Ability to enable local bottom-up solutions	Less strategic capacity, coordination, and influence over Kent-specific issues
Greater flexibility to pilot and learn from new ways of working	Higher risk of disparity in service provision
Better alignment of socio-economic profiles and geographies	High risk in fragmentation in ways of working and inconsistent practice standards
Enabling closer working with Health partners and increased opportunities for efficiencies	Higher risk of operational resilience challenges
Enabling closer working with the police due to coterminous boundaries	Higher risk of disruption to critical services which are currently countywide
	High risk of inconsistencies in residents' experiences of services
	Increased complexity in realigning and reorganising current partnerships to fit a 3U model
	Decreased level of leverage with central government and other regional and national bodies
	High risk of employment market competition
	Increased demand for senior leadership roles for critical services with duplication and cost implications
	Lack of economies of scale
	Higher disaggregation costs

3.2 Specific considerations for Options 2, 3 & 4 (4 unitary)

Opportunities	Challenges
Greater ability for localised expertise, knowledge and service delivery	Reduced buying power and economies of scale
More homogenous authorities able to address local priorities and specific demographic and economic needs	Weakened ability to influence the Kent economy
Greater agility in service delivery and faster implementation of policies	Weakened financial resilience and stability
Greater ability to address urban and rural needs	Fewer specialised teams/roles/services
Localised commissioning practice with increased ability for added social value	Reduced strategic oversight for critical services
Agility to implement locally driven ways of working and responding to trends in demand	Less capacity for invest to save projects and less potential for scalable benefits
Increased ability to reflect place in service delivery	Highest risk for imbalanced service demand (adult social care, children social care, housing)
Faster implementation of policies	High risk of disparity in service provision and outcomes
Greater potential to bring together, coordinate, and strengthen services provided by the LA and local partners	Highest risk of fragmentation in service planning and delivery
Highest potential for flexibility to pilot and learn from new ways of working	High risk of an imbalanced care market
Greater ability to enable local bottom-up solutions	Highest risk of disparity of deprivation levels and age profiles
Greatest potential for targeted work and a strengths-based approach	High risk of reduced stability for operational resilience
More control over local budgets	Less workforce flexibility to cover shortages
Increased ability to deliver localised regeneration projects	High risk of employment market competition
Ability to work at a hyper-localised level with partners (neighbourhood-based governance)	High risk of duplication and inefficiencies (service and policy overlap, administrative costs)
Ability to maximise local partnership working including the VCSE	Lack of standardised commissioning practices
Ability to establish more effective engagement mechanisms with residents	High risk of an overcompetitive market
	High risk of fragmented partnerships and lack of joined up working
	Higher level of complexity for coordination and communication (between the unitaries, with partners etc.)
	Increased complexity in realigning and reorganising current partnerships to fit a 4U model
	Added layer of complexity to cross-boundary working and information sharing
	Less influence on Kent-specific issues
	Lack of strategic capacity
	Loss of scale efficiencies and higher operational costs

3.3. Specific considerations for Option 5 (2 unitary)

Opportunities	Challenges
Greater ability to maintain partnerships, collaboration and continuity	Risk of disruption to services which are currently countywide
Easier to integrate data and share information	Risk for service provision variation
Better balance between population size and maintaining local knowledge	Risk of divergence in priorities
Ability to scale up ways of working and projects	Duplication of statutory/key senior leadership roles
More flexibility to commission local providers and be more responsive to local needs	Realigning and reorganising current partnerships to fit a 2U model
Less susceptibility to market volatility	Multiple systems for key services and impact on continuity of service provision
Better asset utilisation adapted to local need	Balancing urban vs rural competing needs
Better asset utilisation adapted to local need	Increased risk of employment market competition
Reduced risk in governance fragmentation	Distinct geographic profiles and economies, acting independently with less strategic collaboration
	Exacerbating geographical and service provision inequalities
	Delivery and governance structures need to be in place to allow for adaptation and responsiveness at a community/local level
	Reduced service flexibility

3.4 Specific considerations for Option 6 (1 unitary - benchmark)

Opportunities	Challenges
Greater financial resilience and sustainability and ability to withstand crises	Large population size - less responsive decision-making, bureaucratic complexity and inefficiencies
Greater capacity for specialised services	Less local responsiveness - if the right mechanisms are not in place
Greater operational resilience	Decreased ability for tailored service delivery - if the right mechanisms are not in place
Greater purchasing power and commissioning	Reduced local connection
Greater ability to manage demand and plan service provision	Reduced localised expertise
Ability to implement longer term strategies - prevention, spatial, climate, community safety	Trade-off between scale and innovation
Centralised systems vs multiple platforms	Commissioning practices and default to large contracts
Standardised eligibility criteria and referral pathways	Risk of centralised bottlenecks and slower decision-making
Standardisation of service design and delivery	Increased risk of politicisation of strategic decisions if not balanced by transparent governance and community engagement
Reduced duplication of services and fragmentation	Potential complexities and inefficiencies in aggregating support functions (HR, IT etc.)
Increased influence on Kent-specific issues	
Greater strategic capacity and a single, coherent voice	
Simplified governance	
Single point of contact and information for residents	
Familiarity/minimised service disruption for residents	
Robust place-based approach, joining up all assets	
Greater capacity and resource for invest to save proposals	

4) Highest Rated options for Transformation

- **Market:** Option 5 (2 Unitary Authority Model)
- **Prevention:** Option 6 (1 Unitary Authority Model - benchmark) (with mitigations)
- **Planning:** Option 6 (1 Unitary Authority Model - benchmark)
- **Visible Services and Value for Money:** Option 1 (3 Unitary Authority Model)

Overall Highest Rated Option for Transformation:

- **Option 5 (2 Unitary Model)**

Despite the variation across themes, the report concludes that the 2UA model offers the most balanced and effective approach overall. It combines:

- Strategic capacity and economies of scale (similar to 1UA),
- Local responsiveness and flexibility (closer to 3UA),
- Reduced risk of fragmentation and service inconsistency (compared to 3UA/4UA),
- Stronger alignment with existing partnerships and safeguarding structures,
- Better resilience to demand fluctuations and financial pressures.
- Better resident experience than 1UA

From a transformation perspective, the two unitary authority (2UA) model scores highest as it offers the most balanced and sustainable approach to delivering efficient, and resident-focused public services across Kent. It combines the strategic capacity and economies of scale associated with a single authority - enabling more effective market shaping, integrated planning, and investment alignment - with a level of local responsiveness that supports tailored service delivery and community engagement. The 2UA model mitigates the risks of over-centralisation seen in the 1UA model, while avoiding the fragmentation, duplication, and coordination challenges inherent in the 3UA and 4UA options. It supports more consistent commissioning, stronger partnerships with health and public service bodies, and a more resilient care and support market by balancing demographic and service demand across a broader geography. Critically, it enables transformation through streamlined governance, digital innovation, and integrated service design, while maintaining the agility to respond to local needs - making it the most viable structure to realise the full benefits of Local Government Reorganisation.

Devolution policy assessment

Table of Contents

1. Introduction	1
2. Summary of issues related to the relationship between devolution and local government reorganisation.....	1
How do we create unitaries with the capacity, capability and scale to engage and deliver within an MCA?.....	1
How do you change the relationship between tiers, so we avoid recreating the fragmentation of the two-tier system?	3
3. Considerations for Three Unitary Model – Option 1.....	3
4. Considerations for a Four Unitary Model – Option 2.....	6
5. Considerations for a Four Unitary Model – Option 3.....	8
6. Considerations for a Four Unitary Model – Option 4.....	10
7. Consideration for a Two Unitary Model -Option 5	12
8. Consideration for a Single Unitary Model – Option 6 (Benchmark).....	14
9. Conclusion	16

1. Introduction

- 1.1 The Devolution assessment considered the opportunities and challenges around devolution policy presented by Local Government Reorganisation (LGR) in Kent and Medway addressing the following themes:
- How do we create unitaries with the capacity, capability and scale to engage and deliver within an MCA?
 - How do you change the relationship between tiers, so we avoid recreating the fragmentation of the two-tier system?
- 1.2 Kent’s ambitions for Devolution are covered in the joint Kent and Medway Devolution Priority Programme (DPP) submission from March this year. Consequently, the main part of this paper only deals with the ‘why’ and ‘what’ very briefly.

2. Summary of issues related to the relationship between devolution and local government reorganisation

How do we create unitaries with the capacity, capability and scale to engage and deliver within an MCA?

This includes creating sustainable building blocks for the future Strategic Authority (SA).

- 2.1 Evidence from areas that have already pursued the Mayoral Combined Authority (MCA) model (now Mayoral Strategic Authority (MSA)) highlight that **the most effective and mature devolved governance arrangements are where a MCA model is underpinned by a Combined Authority (CA) membership of (unitary) councils of roughly the same size, with the same functions and similar issues and challenges, as it supports joint working and prioritisation, but also creates a stronger capacity and capability to ensure collective approach within the CA between the Mayor on the constituent councils.**
- 2.2 **Coupled with the devolution of powers and responsibilities from Whitehall to a Kent and Medway mayoral strategic authority (MSA), this could make local government more efficient and responsive to the needs of Kent residents.**
- 2.3 **However, the issues of devolution and LGR are inextricably linked and concurrent implementation is likely to be the most effective way to achieve a sustainable future local government system in county areas. Government acknowledges this position in the English Devolution White Paper as reorganisation without devolution risks leaving Kent and Medway with marginal benefits, significant costs, and opportunity loss from not being able to seize the benefits of devolution as early as possible.**
- 2.4 There is increasing evidence that individual councils are unable to meet the financial challenge as growing budgetary pressures, worsened by steadily rising social care demand, have seen the viability of Kent and Medway's 14 local councils increasingly at risk. The scale of direct savings from LGR has also been on a diminishing curve for some time and may not be of sufficient scale to balance the disaggregation costs for large counties such as Kent. **What could be transformational, is placing new unitary councils in a system where they can influence the strategy, policy and funding levers available to new MSAs through devolution, to maximise both resource available and the effectiveness of services in their local areas.**
- 2.5 **There is a strong theme of Public Service Reform (PSR) running throughout the White Paper and PSR must be a golden thread that runs through both LGR and devolution if Kent public services are to be financially sustainable. This approach would involve an MSA/MCA increasingly taking on the role of an Integrated Public Services Authority, which owns, drives and embeds a local PSR agenda/programme – which would include integration and prevention - and be designed by Kent and Medway for the benefit of Kent and Medway.** This would enable individual service organisations (the new unitary councils) being responsible for operational delivery of public service delivery to residents, with the strategic policy, budget and delivery accountabilities flowing through the MSA/MCA where collective approaches and shared resources could be agreed to tackle the structural and systemic issues that impact Kent and Medway's local communities the most.
- 2.6 **Ultimately, Devolution, LGR and PSR could also facilitate Kent and Medway Members – the new unitary councils and MSA - to become stronger conveners of place, rebalancing the current trajectory of the public sector in Kent and Medway from needing to dedicate much of its capacity to managing demand in adult social care, children's services and homelessness and contract inflation.**

How do you change the relationship between tiers, so we avoid recreating the fragmentation of the two-tier system?

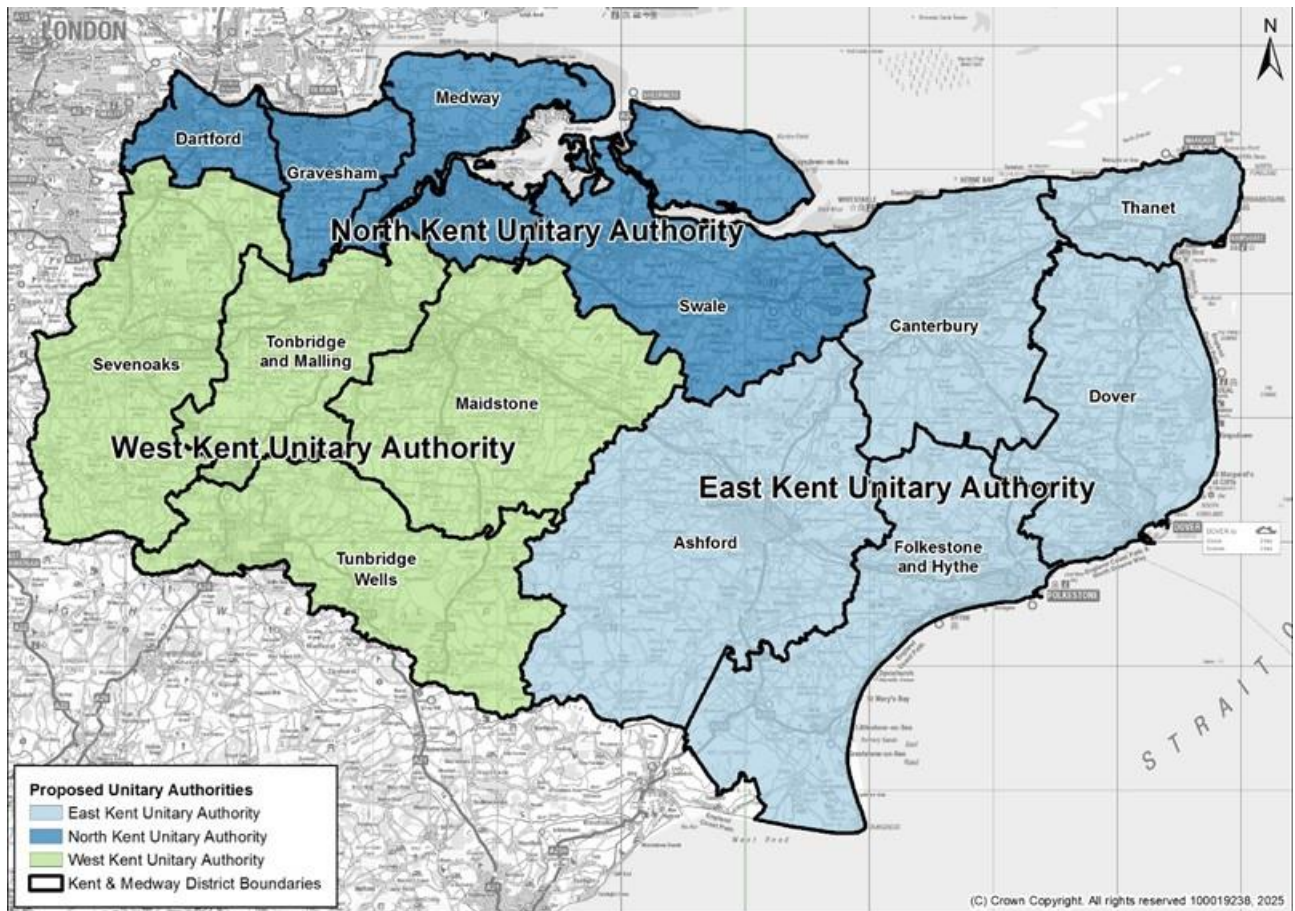
This includes scaling up to work at a regional (Kent and Medway) level and a strong voice for Kent at national level.

- 2.7 **The current two-tier system in Kent creates challenges because the relationship is unequal in terms of responsibilities and budgets.** District Councils may have planning as a major responsibility, but housing targets are now primarily a central Government role. Meanwhile county councils have social care and a budget that dwarfs districts. Some districts are also facing increasing challenges to their financial viability, placing further strain on two-tier relationships.
- 2.8 **A unitarised Kent & Medway therefore could lead to a more equal relationship in terms of parity of responsibilities** and, in theory, budgets as well as enhancing accountability and a resetting of the relationship between local government and the public.
- 2.9 **Through devolution the strategic policy, budget and delivery accountabilities would flow through the MSA** where collective approaches and shared resources can be agreed to tackle the structural and systemic issues that impact Kent and Medway's local communities the most, and which often cut across individual public service roles and remit. For example, social isolation, coastal deprivation, homelessness and mental health support.
- 2.10 As outlined in the Revised Devolution Framework in the English Devolution Paper¹, **the role, powers and responsibilities of a Mayoral Strategic Authority (MSA) is to deal with strategic issues** (Transport and local infrastructure; Skills and employment; Housing and strategic planning; Economic development and regeneration; Environment and climate change; Health and Wellbeing; Public Service Reform (PSR); & Public Safety), **whilst, the new unitary councils would operate as delivery vehicles for MSA priorities**, and focus on leading their own place-based services as well as being sustainable enough to engage as strategic authority partners. This clear distinction between strategy and delivery will be an important keystone in relationship management between the unitary authorities and an MSA.
- 2.11 **It would be the role of a Directly Elected Mayor for Kent & Medway to not only manage the strategic relationships and responsibilities in Kent but also the convening role they would bring to those wider discussions taking place at regional and national forums such as the Mayoral Council for England.**

3. Considerations for Three Unitary Model – Option 1

This and the following sections explore the various unitary options through the criteria that new unitary structures must support devolution arrangements. These sections also consider the different challenges and opportunities identified across the different proposed models for LGR in Kent.

¹ [English Devolution White Paper - GOV.UK](#)



Population Criteria

- 3.1 **Kent and Medway's population size (estimated to be approximately 1,879,100²) would enable a Strategic Authority (SA) across the county footprint in accordance with government criteria (combined population of 1.5 million or above).**
- 3.2 For a MSA to work effectively, the constituent authorities should be unitary councils of near equal size, with the same statutory responsibilities. In this option, **the proposed unitary councils** (North: 663k, East: 662k, West: 551k) **all exceed the government's 'guiding principle' of a 500,000 population for LGR arrangements** and have similarly sized populations, creating equal partners under an MSA.

Border Infrastructure

- 3.3 **This option creates councils with the critical mass of capacity and resources to manage Kent and Medway's unique position (particularly East Kent) as the UK's border to Europe.** For example, all infrastructure in the county to manage the movement of goods and people across the border would all be contained within the proposed East Kent unitary council (Eurotunnel, Port of Dover, Sevington Inland Border Facility and Manston Arrivals and Processing Centre).
- 3.4 By reducing the existing structure (County, 12 districts, and one unitary) to three new councils, this option simplifies governance and enhances the region's **ability to negotiate**

² [2023 Mid year population estimates Total population in Kent](#)

targeted investment, including for national priorities such as the Thames Gateway and Channel Ports corridor.

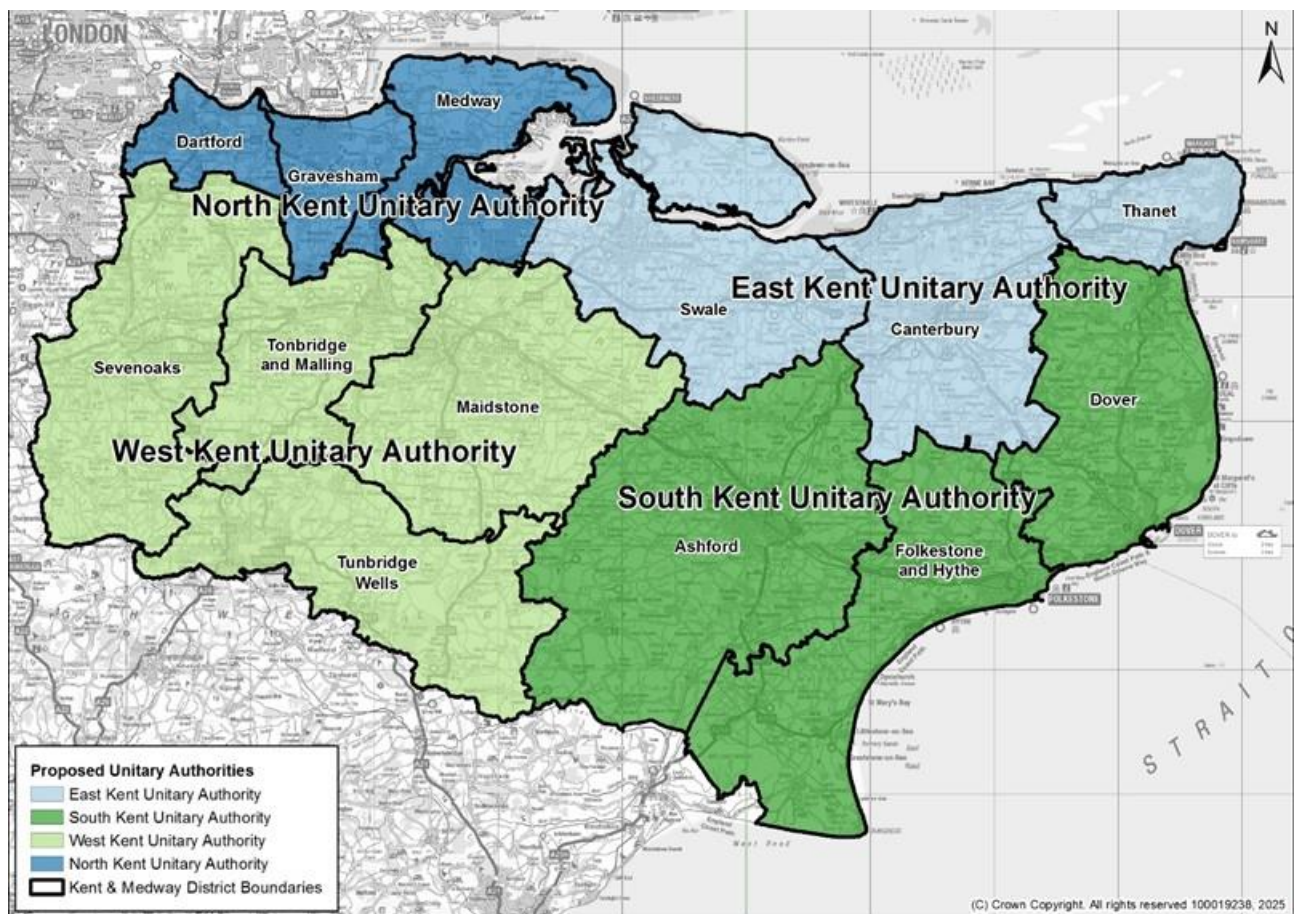
Partnership Working

- 3.5 **Fewer unitary authorities may potentially be easier for a MSA to work with in partnership and manage expectations across the geographic footprint of the county.** A key benefit of this model is that with three voting authorities, there cannot be a “deadlock” in decision making.
- 3.6 **The coterminosity of public services within the current Kent and Medway boundary is an advantage that has allowed existing partners to focus on developing effective ways to work together within the county.** The three proposed unitary councils would create a clean, simple arrangement with established relationships and a track record of delivery.

Capacity, Scope and Capability

- 3.7 **It would create new unitary councils with sufficient scale and capacity to engage directly with a potential Directly Elected mayor and, conversely, with central government.** It also supports fair democratic representation and provides a sustainable scale for delivering strategic functions under a Mayoral Strategic Authority (MSA).
- 3.8 **While the three unitary authority option establishes a strong structural basis for a devolved landscape, variation in financial resilience**, particularly in North and East Kent, **could highlight the financial and socio-economic inequity across the county and a future Mayor** (and central government) **may have to focus their activity more on those underperforming areas.**
- 3.9 **A unitary authority that is struggling financially may not have the ability to be a reliable partner at a pan-Kent level nor the delivery capacity to deliver MSA priorities in their area.**
- 3.10 **Until a MSA is formed, the unitary authorities would be well placed to take on strategic planning, in the form of a Sustainable Development Strategy (SDS).** However, this would later become a mayoral responsibility when the MSA is vested. The removal of overlapping responsibilities between tiers reduces duplication and strengthens the potential for coherent Kent and Medway planning and delivery.
- 3.11 **The three unitary model will create new councils of sufficient size to act as effective anchor institutions** within their areas, with sufficient leverage as major employers and purchasers to play their part in **driving local economic growth.**
- 3.12 **A challenge is the fewer new unitary councils the greater the distance between residents and decision-makers and this may reduce perceptions of local responsiveness and accountability;** however, it is suggested through the work identified in the Democracy and Local Identity assessment that appropriate mitigations, such as the use of Area/Community Boards, could be a suitable mechanism to provide a more localised focus.

4. Considerations for a Four Unitary Model – Option 2



Population Criteria

- 4.1 Kent and Medway's population size (estimated to be approximately 1,879,100³) would enable a Strategic Authority (SA) across the county footprint in accordance with government criteria (combined population of 1.5 million or above).
- 4.2 In this model the unitaries would not have evenly distributed populations (East: 453K, South: 363K, North: 508K, West: 551K), and South Kent would be significantly under the "guiding principle" of 500,000.

Border Infrastructure

- 4.3 The role of Kent as the UK's border to Europe will be a challenge as the four unitary model may result in councils that lack the critical mass of capacity and resources to manage this. This model separates Manston Arrivals and Processing Centre from other border services such as the Port of Dover and Eurotunnel Le Shuttle at Folkestone. This would result in a MSA having to work across multiple unitaries in order to address any challenges that arise.

Partnership Working

³ 2023 Mid year population estimates Total population in Kent

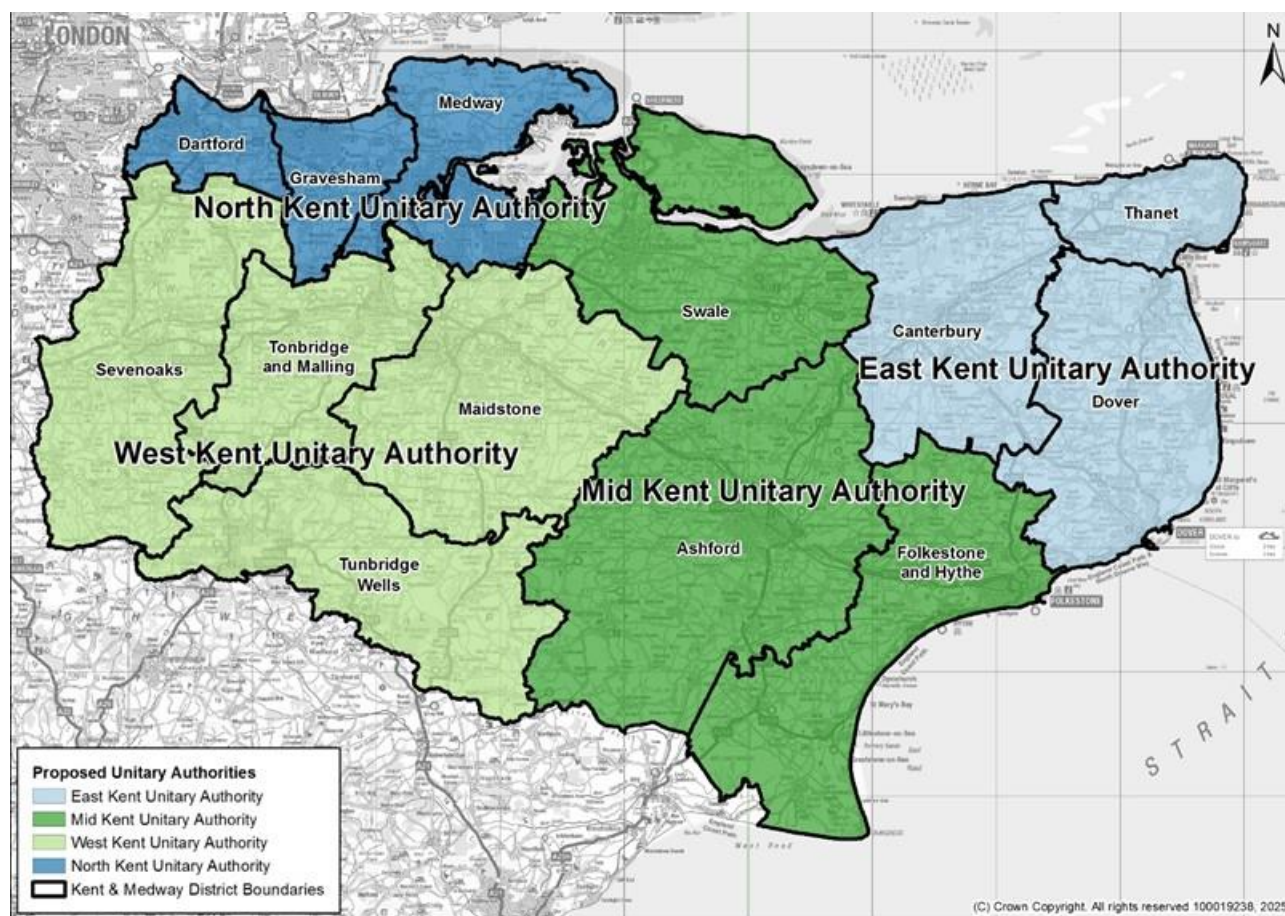
- 4.4 **Until a MSA is in place, four unitaries may weaken Kent's ability to secure national funding and infrastructure investment, as larger authorities typically have greater negotiating power.**
- 4.5 **Services that benefit from county-wide coordination**, such as strategic transport planning, **could become more fragmented, making long-term planning difficult.** For example, this 4 unitary model separates Thanet from Folkestone and Hythe and Dover which means that the mayoral focus on coastal regeneration would require a more collaborative approach across two separate unitary authorities.
- 4.6 In terms of cross mayoral relationships, there is a potential for a **North Kent unitary to be less engaged with a Kent Mayor and more inclined to pursue greater engagement with the London Mayor.** For example, certain services such Transport for London (TfL) already have a reach which extends into areas of North Kent (Dartford).

Capacity, Scope and Capability

- 4.7 **Smaller unitary councils may face capacity challenges and lack economies of scale that could reduce efficiency in service delivery.** For example, in this model, there are large financial and socio-economic disparities between East, North East, Medway, and West Kent.
- 4.8 **In addition, a unitary authority that is struggling financially may not have the ability to be a reliable partner at a pan-Kent level nor the delivery capacity to deliver MSA priorities in their area.**
- 4.9 **With four unitaries, governance could be more focused on local priorities**, ensuring more voices in local decision-making and potentially leading to a more nuanced and responsive approach to policy development. Conversely, this could also lead to inertia.
- 4.10 **This option groups Swale and Thanet together in East which creates the most deprived unitary authority of all of the options, meaning that this authority might require Exceptional Financial Support (EFS).** Therefore, the capacity of the East Kent authority may be predominately focussed on their own day to day operation, rather than having the capacity to engage with strategic work at the mayoral level. These issues may also draw a mayor to focus disproportionately on this council.
- 4.11 Four unitaries introduce additional layers of coordination, increasing the risk of overlapping responsibilities and **higher administrative costs** compared to fewer unitaries.
- 4.12 **Following the completion of LGR, the Mayor has a role to ensure that current strategies that are pan-Kent continue to remain.** For example, the Stodmarsh Nutrient Mitigation Strategy⁴ would be split across two unitary authorities (Ashford and Canterbury) in this model.

⁴ [24-00122 - Stodmarsh Nutrient Mitigation Strategy.pdf](#)

5. Considerations for a Four Unitary Model – Option 3



Population Criteria

- 5.1 **Kent and Medway's population size (estimated to be approximately 1,879,100⁵) would enable a Strategic Authority (SA) across the county footprint in accordance with government criteria (combined population of 1.5 million or above).**
- 5.2 **Of the four unitary authority options, this version would create the most evenly distributed populations (East: 416K, Mid: 400K, North: 508K, West: 551K), potentially enhancing democratic representation.** This could allow services to be better tailored to local demographic and geographic needs, improving community engagement and satisfaction.

Border Infrastructure

- 5.3 **The role of Kent as the UK's border to Europe will be a challenge as the four unitary model may result in councils that lack the critical mass of capacity and resources to manage this.** This model separates Folkestone and Hythe (Eurotunnel) and Ashford (Sevington) from Dover (Dover Port) and Thanet (Manston) and subsequently splits border services even further than in option 2. This could make it more challenging for a mayor to strategically work on border issues.

⁵ [2023 Mid year population estimates Total population in Kent](#)

Partnership Working

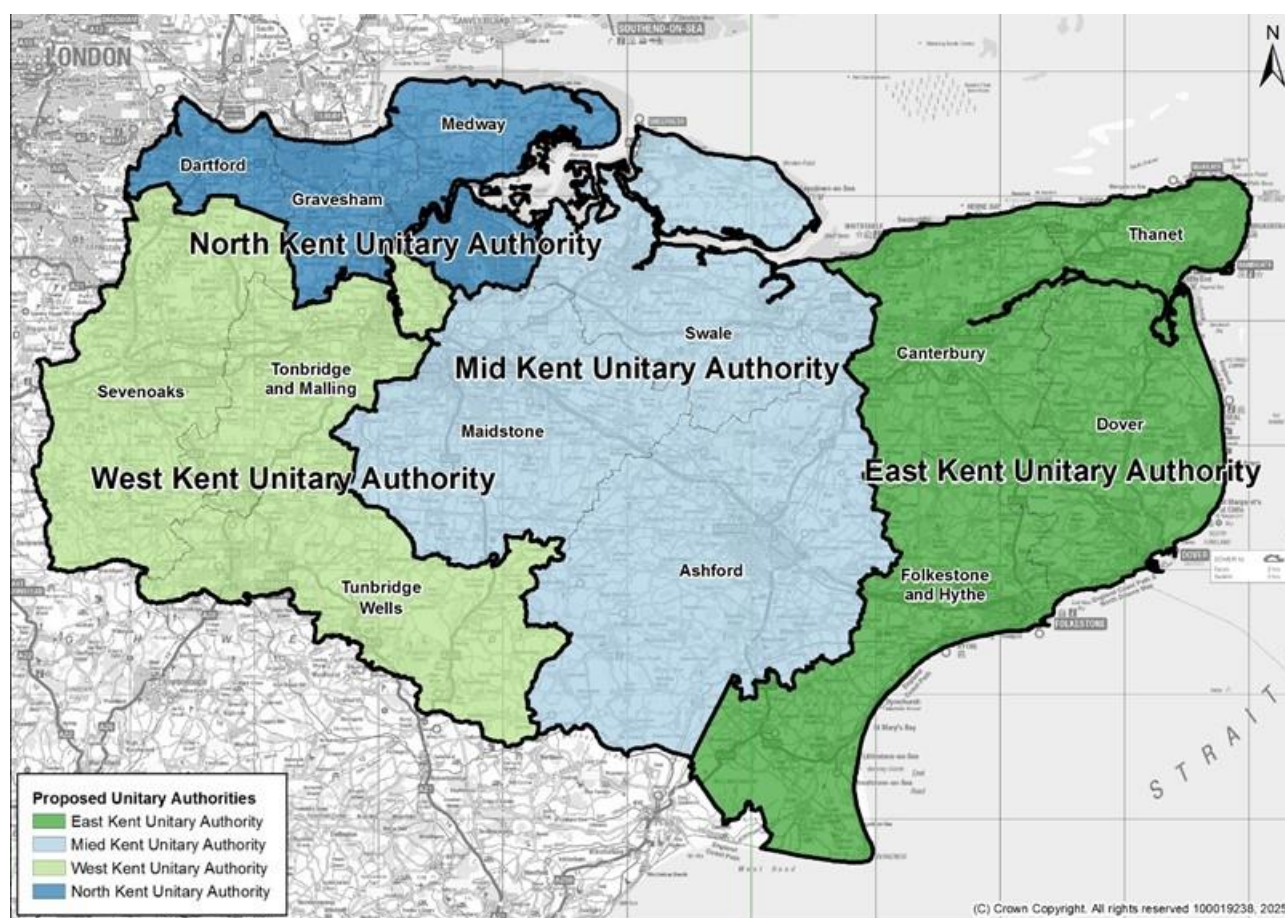
- 5.4 In terms of cross mayoral relationships, there is a potential for a **North Kent unitary to be less engaged with a Kent Mayor and more inclined to pursue greater engagement with the London Mayor**. For example, certain services such as Transport for London (TfL) already have a reach which extends into areas of North Kent (Dartford).

Capacity, Scope and Capability

- 5.5 **Smaller unitary councils may face capacity challenges and lack economies of scale, potentially reducing efficiency in service delivery, whereas larger authorities may be more resilient**. For example, there are financial and socio-economic disparities between East and West Kent. Although the 'East Kent Triangle' (Canterbury, Thanet and Dover) is an acknowledged functional area, it would still have financial and socio-economic challenges, compared to the other unitaries. This could lead to reduced capacity to work on mayoral priorities such as regeneration, particularly coastal regeneration. An MSA (particularly the mayor) could spend a disproportionate amount of effort on one unitary.
- 5.6 **In addition, a unitary authority that is struggling financially may not have the ability to be a reliable partner at a pan-Kent level nor the delivery capacity to deliver MSA priorities in their area.**
- 5.7 **With four unitaries, governance could be more focused on local priorities**, ensuring more voices in local decision-making and potentially leading to a more nuanced and responsive approach to policy development. Conversely, this could also lead to inertia.
- 5.8 Four unitaries introduce additional layers of coordination, increasing the risk of overlapping responsibilities and **higher administrative costs** compared to fewer unitaries.
- 5.9 **Four unitaries may weaken Kent's ability to secure national funding and infrastructure investment, as larger authorities typically have greater negotiating power.**
- 5.10 **Services that benefit from county-wide coordination**, such as strategic transport planning, **could become more fragmented, making long-term planning difficult**. In addition, this model separates Thanet and Dover from Folkestone and Hythe which means that the mayoral focus on coastal regeneration would require a collaborative approach across two separate unitary authorities.
- 5.11 **Following the completion of LGR, the Mayor has a role to ensure that current strategies that are pan-Kent continue to remain**. For example, the Stodmarsh Nutrient Mitigation Strategy⁶ would be split across two unitary authorities (Ashford and Canterbury) in this model.

⁶ [24-00122 - Stodmarsh Nutrient Mitigation Strategy.pdf](#)

6. Considerations for a Four Unitary Model – Option 4



Population Criteria

- 6.1 Kent and Medway's population size (estimated to be approximately 1,879,100⁷) would enable a Strategic Authority (SA) across the county footprint in accordance with government criteria (combined population of 1.5 million or above).
- 6.2 This option is similar to option 2 however West and Mid Kent would be under the "guiding principle" of 500,000 (East: 526K, Mid: 470K, North: 508K, West: 371K), which is less evenly distributed than Option 3.

Border Infrastructure

- 6.3 The role of Kent as the UK's border to Europe will be a challenge and a four unitary model may result in councils that lack the critical mass of capacity and resources to manage this. Although this option provides the best (of the four unitary options) in regard to one unitary authority having the majority of border services under their remit (East Kent), this model does separate the Sevington site in Ashford from the other border infrastructure.
- 6.4 This option creates financial and socio-economic inequity between West and East Kent, with the latter potentially lacking sufficient capacity to engage at a MSA level.

⁷ 2023 Mid year population estimates Total population in Kent

This could also create a requirement for a MSA to spend a disproportionate amount of time on an East Kent authority.

Partnership Working

- 6.5 In terms of cross mayoral relationships, there is a potential for a **North Kent unitary to be less engaged with a Kent Mayor and more inclined to pursue greater engagement with the London Mayor**. For example, certain services such as Transport for London (TfL) already have a reach which extends into areas of North Kent (Dartford).

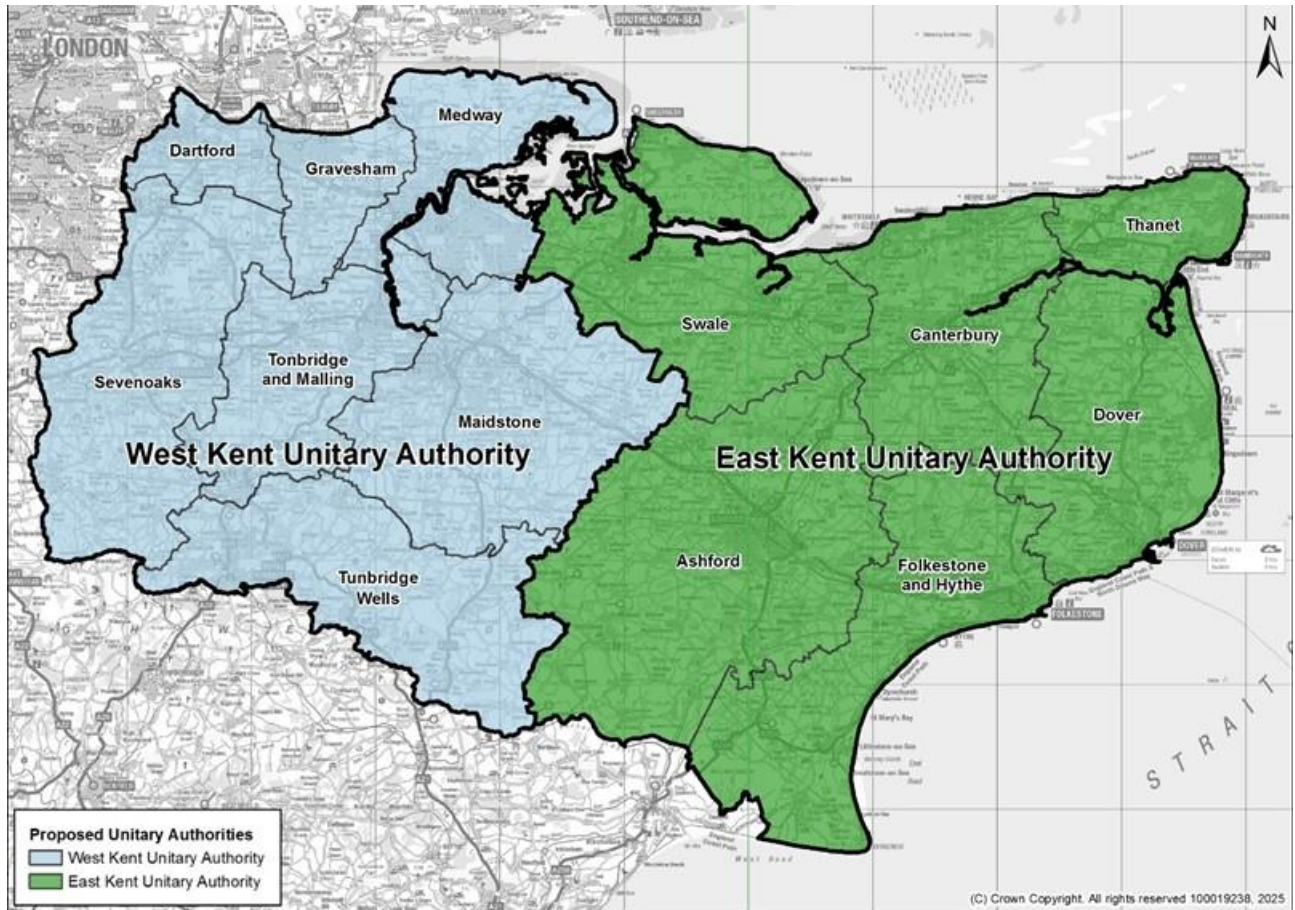
Capacity, Scope and Capability

- 6.6 **Smaller unitary councils may face capacity challenges and lack economies of scale, potentially reducing efficiency in service delivery, whereas larger authorities may be more resilient**. For example, there are financial and socio-economic disparities between East and West Kent, these are particularly more acute than in option 2 due to West Kent being consolidated into the affluent Districts of Sevenoaks, Tonbridge and Malling and Tunbridge Wells. East Kent is more likely to have additional issues including capacity challenges which gives no bandwidth to work on mayoral activity such as regeneration such as coastal regeneration.
- 6.7 **In addition, a unitary authority that is struggling financially may not have the ability to be a reliable partner at a pan-Kent level nor the delivery capacity to deliver MSA priorities in their area.**
- 6.8 **With four unitaries, governance could be more focused on local priorities**, ensuring more voices in local decision-making and potentially leading to a more nuanced and responsive approach to policy development. Conversely this could also lead to inertia.
- 6.9 Four unitaries introduce additional layers of coordination, increasing the risk of overlapping responsibilities and **higher administrative costs** compared to fewer unitaries.
- 6.10 **Four unitaries may weaken Kent's ability to secure national funding and infrastructure investment, as larger authorities typically have greater negotiating power.**
- 6.11 **Services that benefit from county-wide coordination**, such as strategic transport planning, **could become more fragmented, making long-term planning difficult.**
- 6.12 **This option may also create issues for spatial planning, with the West unitary authority not wishing to pursue higher levels of housing expansion** which would in turn place this burden more so on the other unitary councils to increase housing stock for the county.
- 6.13 **Following the completion of LGR, the Mayor has a role to ensure that current strategies that are pan-Kent continue to remain**. For example, the Stodmarsh Nutrient Mitigation Strategy⁸, which aims to protect the River Stour and has impacted on housing growth, would be split across two unitary authorities (Ashford and Canterbury) in this model.
- 6.14 **Mid Kent could become forgotten when considering activity across the entire county.**
This could be a consequence of the higher financial and socio-economic requirements of

⁸ [24-00122 - Stodmarsh Nutrient Mitigation Strategy.pdf](#)

East Kent, combined with the higher levels of wealth in West Kent and a North Kent unitary that is less linked in local identity to the rest of the county.

7. Consideration for a Two Unitary Model -Option 5



Population Criteria

- 7.1 **Kent and Medway's population size (estimated to be approximately 1,897,100⁹) would enable a Strategic Authority (SA) across the county footprint in accordance with government criteria (combined population of 1.5 million or above).**
- 7.2 **A two-unitary structure would result in population ratios significantly higher than the current level identified in the Devolution White Paper of a minimum of 500K and there would be a significant population disparity between the East (816K) and West (1.059K) unitaries. Taken at face value it would mean that the Government would likely not accept a two unitary model. Higher population figures would also be likely to have a negative impact on democratic representation and engagement and place a more significant role on a mayor.**

Border Infrastructure

⁹ [2023 Mid year population estimates Total population in Kent](#)

- 7.3 As with the three unitary model, the **councils will be of sufficient size to act as effective anchor institutions within their areas, with sufficient leverage as major employers and purchasers to play their part in driving local economic growth.**
- 7.4 **The new unitaries would have the necessary capacity and resources to manage Kent's unique position as the UK's border to Europe however it is possible this role would fall disproportionately onto the East Kent unitary.**
- 7.5 **This option creates councils with the critical mass of capacity and resources to manage Kent and Medway's (particularly East Kent) unique position as the UK's border to Europe.** For example, all the critical border infrastructure (the Port of Dover, Eurotunnel Le Shuttle at Folkestone (Cheriton, Sevington Inland Border Facility (IBF), Manston Arrivals and Processing Centre) would all be contained within the proposed East Kent unitary council.

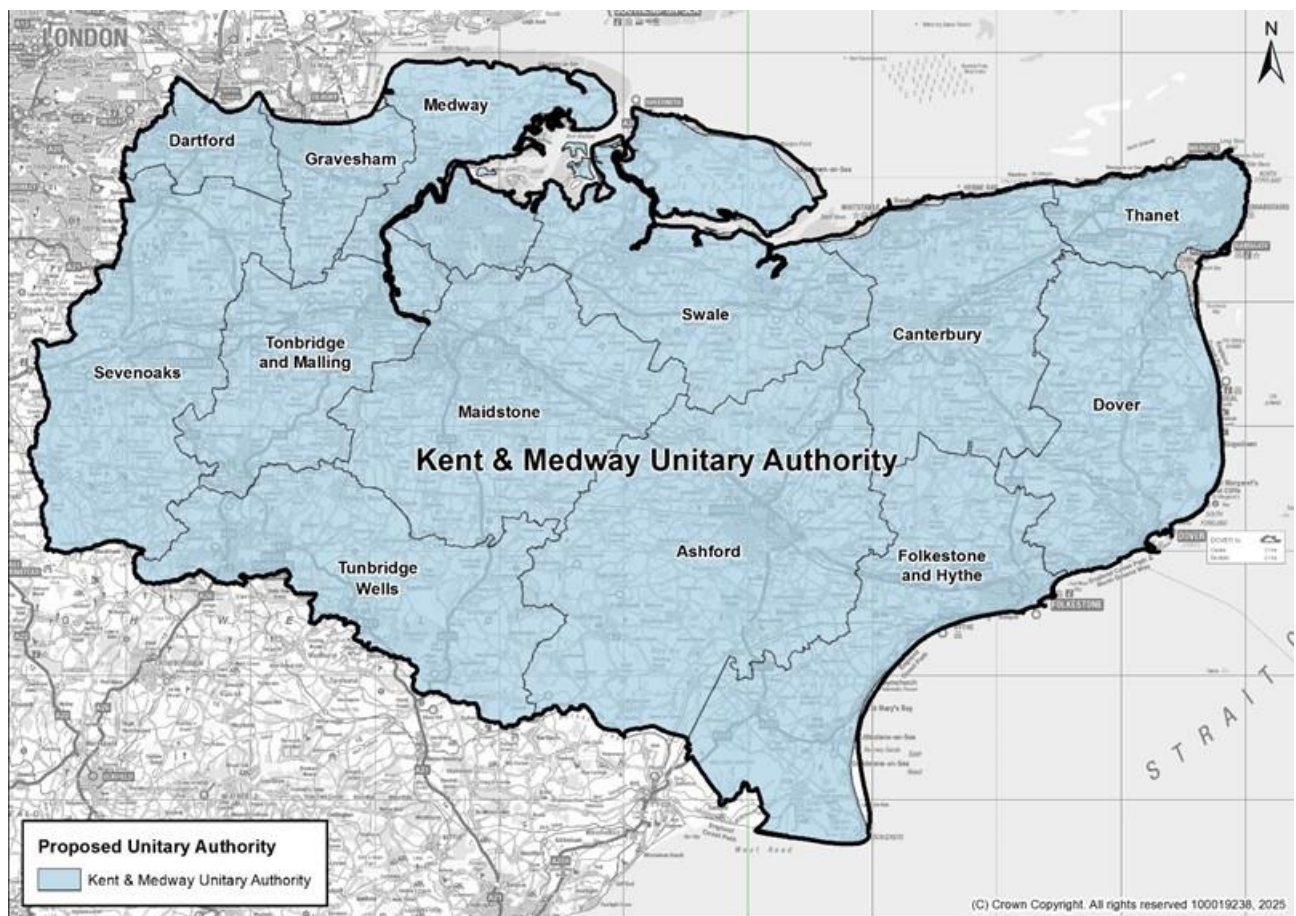
Partnership Working

- 7.6 **Fewer unitary authorities may potentially be easier for a MSA to work in partnership across the geographic footprint of the county.** For example, conversations on pan-Kent transportation strategies would be easier to manage due to less stakeholders for a MSA to engage with.
- 7.7 The governance between an MSA and 2 unitary councils could be problematic in terms of decision-making, as the Mayor would not have a casting vote for all policy issues.

Capacity, Scale and Capability

- 7.8 This option creates two unitaries with **sufficient scale and capacity to engage directly with central government.** By reducing the existing structure (County, 12 districts, and one unitary) to two entities, it simplifies governance, and the option enhances the region's ability to negotiate targeted investment, including for national priorities such as the Thames Gateway and Channel Ports corridor.
- 7.9 **A two unitary model creates an East and West Kent, with very different challenges, local identities and characteristics.** Due to these differing requirements of demand, it could be challenging for a MSA to not spend a disproportionate amount of time on one unitary, more than the other, due to issues such as greater deprivation.
- 7.10 **This option groups Swale and Thanet together in East Kent, which are two of the most deprived Kent Districts.**
- 7.11 **The majority of any coastal regeneration projects would be taking place in one unitary authority (East Kent) which would make coordinating a place-based approach easier to manage.**
- 7.12 **Larger SA's may create distance between residents and decision-makers and reduce perceptions of local responsiveness, engagement and accountability.** For example, there is a possibility that a two unitary model would lack the localised understanding to respond to planning and development and therefore would not be best placed to advise a MSA accordingly. However, community engagement mechanisms could be designed into new unitary operating models to mitigate this.

8. Consideration for a Single Unitary Model – Option 6 (Benchmark)



- 8.1 The government criteria states that a single unitary council and Mayoral Strategic Authority (MSA) cannot be established on the same geographical footprint. Consequently, a single Kent and Medway unitary council would have to combine with a neighbouring authority to create an MSA. However, Kent is unable to do this as our neighbouring authorities are already either on the Devolution Priority Programme (DPP) (Essex and East / West Sussex) or on the LGR Fast-Track (Surrey).
- 8.2 A single unitary model that sought to subsume Medway is unlikely to be supported by Medway or the Labour government.
- 8.3 Significant negotiation and lobbying would be required to put an argument to government that the new Kent and Medway unitary could get devolution as a single area, as this is against their current policy position and is unlikely to be successful.

Population Criteria

- 8.4 A single unitary structure would result in a population higher than the level identified in the Devolution White Paper (i.e. 500,000). A result of this would be a negative impact on democratic representation.

- 8.5 **Kent and Medway’s population size (estimated to be approximately 1,879,100¹⁰) would enable a Strategic Authority (SA) across the county footprint in accordance with government criteria (combined population of 1.5 million or above).**

Border Infrastructure

- 8.6 **This option would have the necessary capacity and resources to manage the nationally important border infrastructure between the UK and Europe.**

Capacity, Scale and Capability

- 8.7 **A single unitary authority would have sufficient leverage as a major employer and purchaser to play its part in driving local economic growth.**
- 8.8 **This model would create one single unitary authority of sufficient size to act as an effective anchor institution for Kent, with sufficient leverage as a major employer and purchaser to drive local economic growth.**
- 8.9 **This option would provide a single voice for the region, a more holistic view of the county and a greater capacity to respond on a regional and national level.**
- 8.10 **This model would provide coterminosity of local public service delivery and our strategic borders.**
- 8.11 **Larger unitary authorities may create distance between residents and decision-makers and give rise to perceptions of reduced local responsiveness and accountability; however, it is suggested through the work identified in the Democracy and Local Identity assessment that appropriate mitigations, such as the use of community boards, could be a suitable mechanism to provide a more localised focus.**

¹⁰ [2023 Mid year population estimates Total population in Kent](#)

9. Conclusion

9.1 In summary, the options under consideration are:

- A three unitary Model
- Three configurations of a four unitary Model
- A two unitary Model
- A single unitary Model

9.2 The conclusion of this assessment is that a **three unitary option best meets the government criteria** to support future devolution arrangements in Kent and Medway for the following reasons:

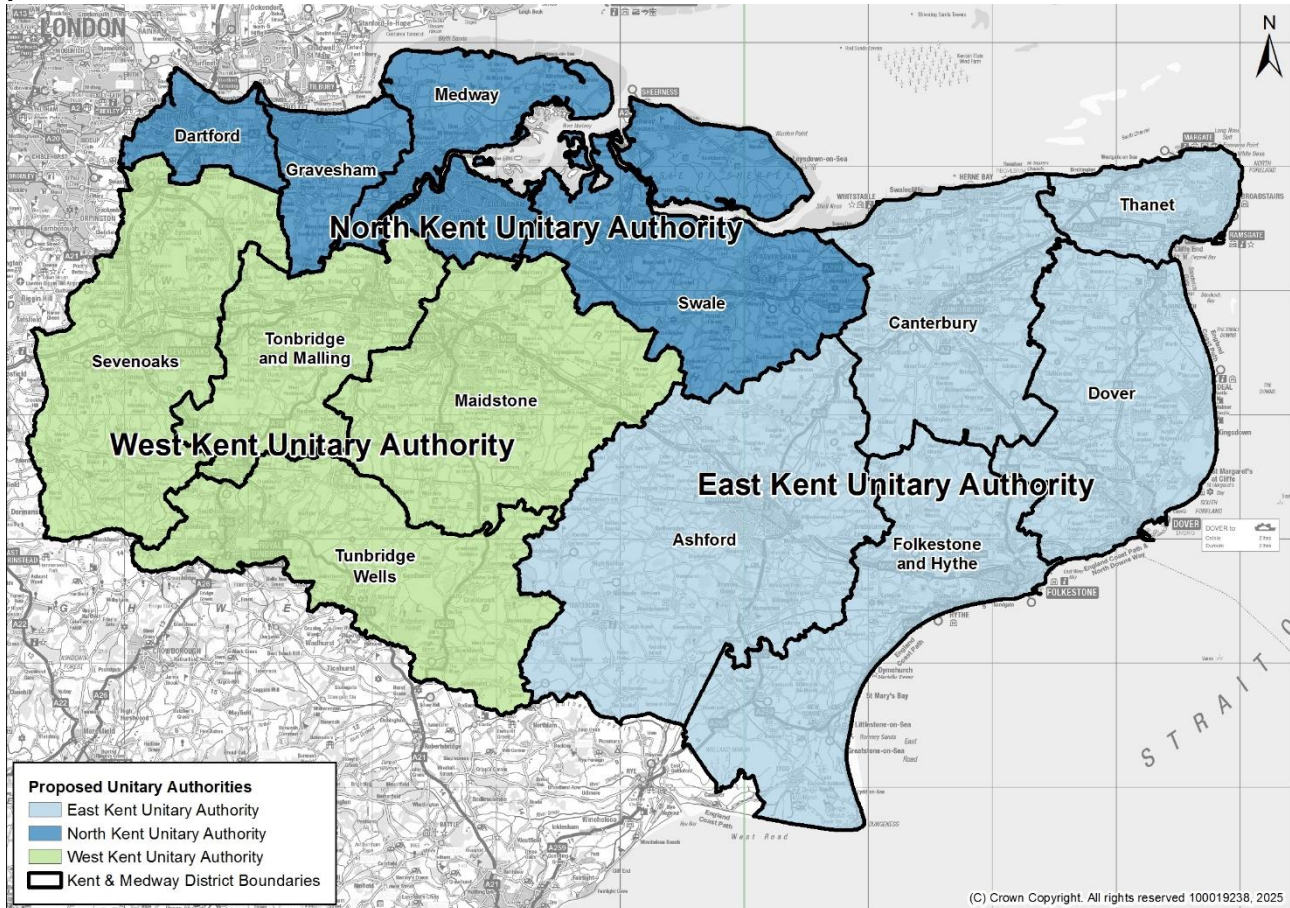
- It **meets the government's population criteria of 500,000 as a 'guiding principle'** for local government reorganisation; and this reflects the interim plan feedback.
- It **meets the government's population requirements for the size of a Strategic Authority (SA).**
- **This model would provide broad coterminosity of local public service delivery.**
- **Compared to the various four unitary options, three unitaries would create councils with the critical mass of capacity and resources to provide local services as well as sufficient scale to engage with a mayor and central government on strategic issues, particularly border infrastructure.**
- **Compared to the other options, fewer unitary authorities may potentially be easier for a MSA to work with in partnership across the geographic footprint of Kent and Medway.**
- **The proposed unitaries are of a configuration that communities would be able to relate to** (i.e. North / 'Greater Medway', East and West Kent).

Profiles for Unitary Options

Model 1 (three unitaries, NEW)

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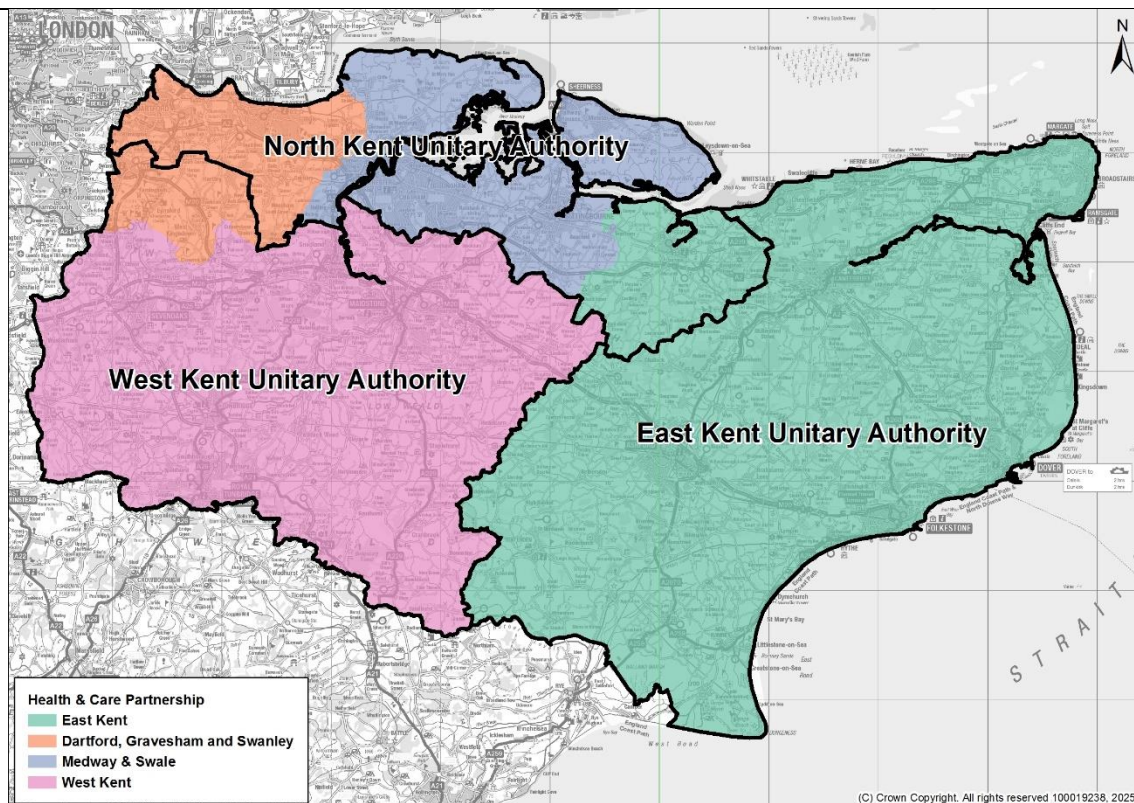
Map



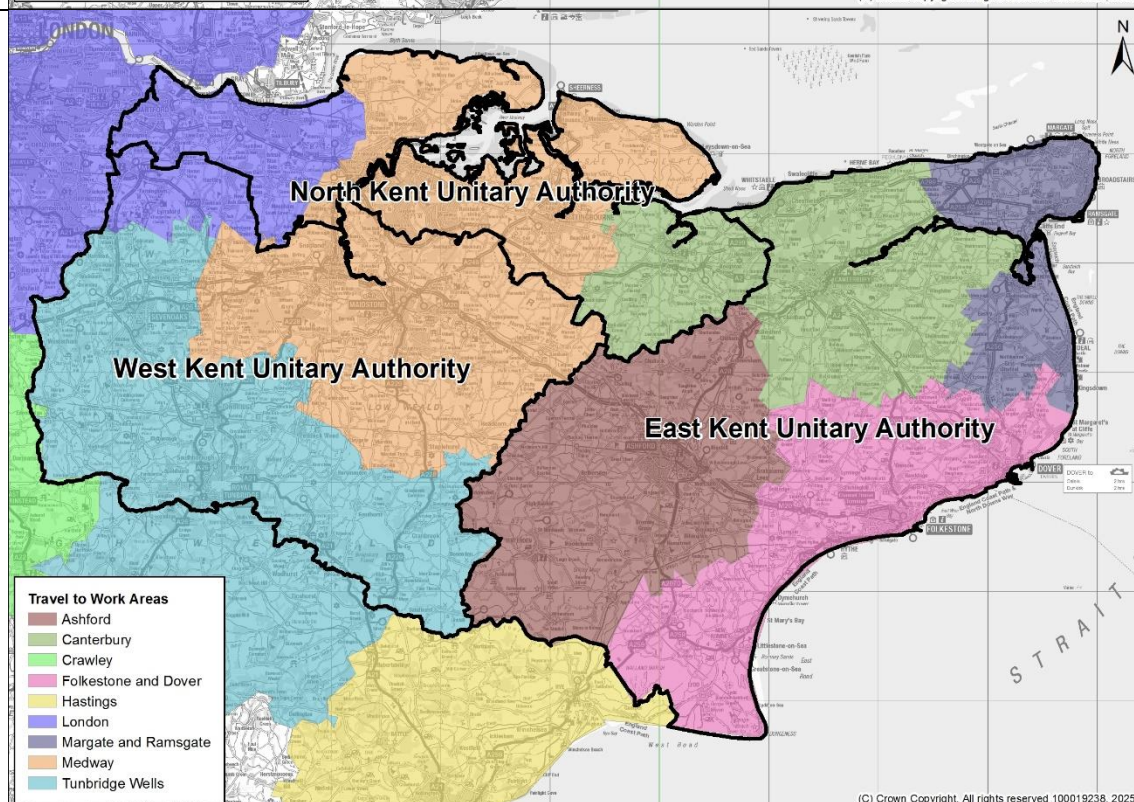
Population:	Potential Unitary	District	District population (mid-2022)	Unitary population (mid-2022)	Potential growth by 2035*
	North Kent	Dartford	118,820	663,111	41k to 96k
		Gravesham	106,970		
		Medway	282,702		
		Swale	154,619		
	East Kent	Ashford	135,610	661,559	53k to 103k
		Canterbury	157,550		
		Dover	117,473		
		Folkestone and Hythe	110,237		
		Thanet	140,689		
	West Kent	Maidstone	180,428	551,223	39k to 72k
		Sevenoaks	121,106		
		Tonbridge and Malling	133,661		
		Tunbridge Wells	116,028		

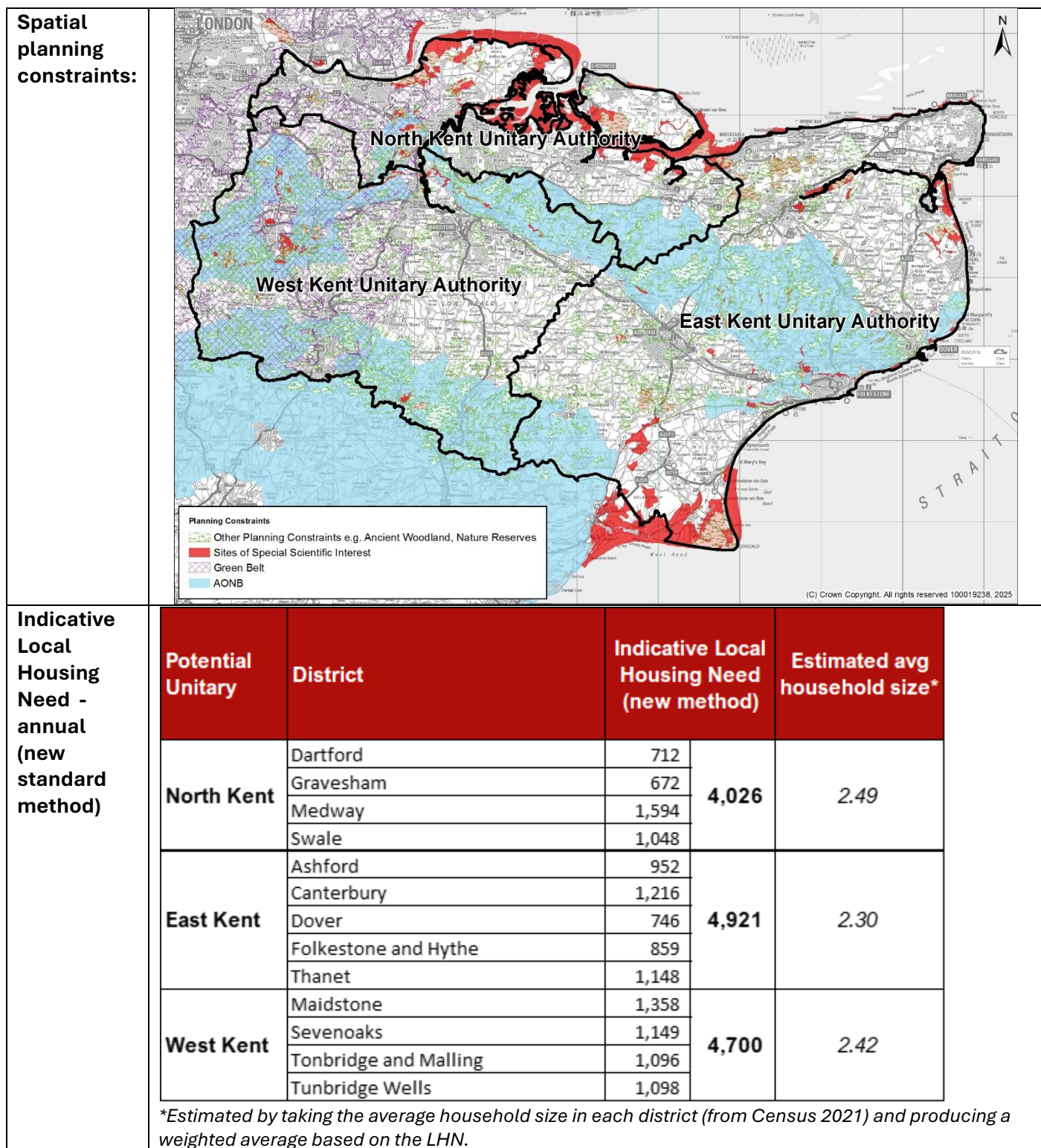
*Two estimates based off the % growth between 2022 and 2035 for each district from: a) the ONS Sub-National Population Projections and b) the KCC Housing Led Forecast. Weighted by each district's contribution towards the UA's total population (2022 MYE).

**NHS Health
& Care
Partnership
alignment:**



**Travel to
Work
Areas:**





Population composition

	North	East	West	Kent	England & Wales
Population aged 0-15	21.0%	17.5%	19.8%	19.4%	18.4%
Population aged 16-64	62.3%	59.5%	60.2%	60.7%	62.8%
Population aged 65+	16.7%	23.0%	20.0%	19.9%	18.8%

*based on mid-2023 population estimate

Deprivation

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

	North	East	West	Kent
% LSOAs in top 10%	8.9%	7.8%	0.6%	6.1%

Disability benefit claimants

Proportion of working age people claiming disability benefits (AA+DLA+PIP) from the DWP in November 2024

	North	East	West	Kent	England & Wales
% of 16-64s claiming AA/DLA/PIP	17.8%	21.7%	14.6%	18.2%	17.2%

Unemployment

Proportion of people receiving benefits for unemployment (Jobseekers Allowance and out of work Universal Credit claimants) in May 2025

	North	East	West	Kent	England & Wales
Unemployment: % of 18-64s claiming	4.1%	4.0%	2.8%	3.7%	4.3%
Youth unemployment: % of 18-24s claiming	7.0%	6.2%	4.6%	6.1%	5.5%

Qualifications (from Census 2021)

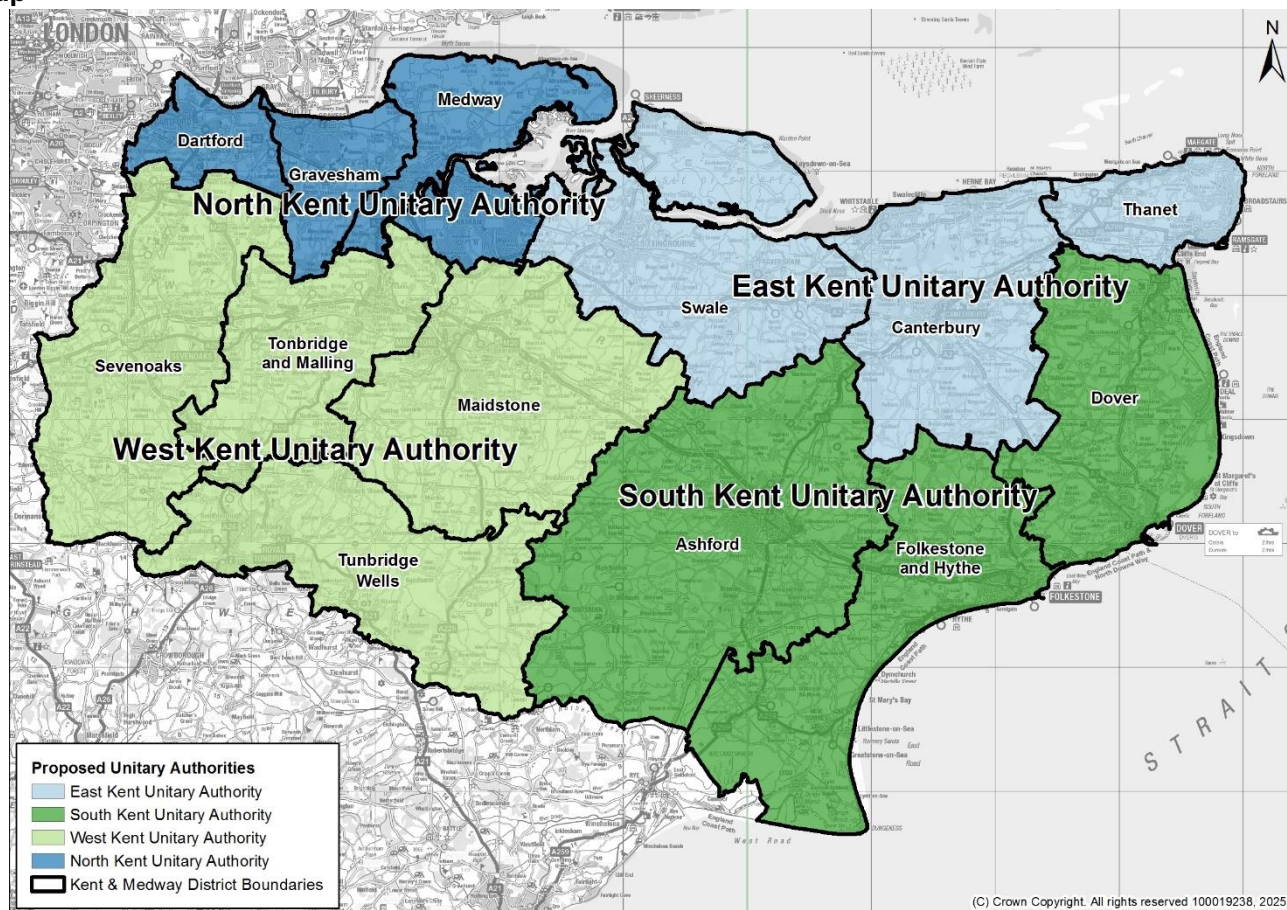
Highest level of Qualification of people aged 16+ from the 2021 Census.

	North	East	West	Kent	England & Wales
% with Level 2 qualification or higher	65.5%	67.4%	71.6%	68.0%	69.4%
% with Level 4 qualification or higher	26.5%	29.0%	34.6%	29.8%	33.8%

Model 2 (four unitaries, NESW)

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

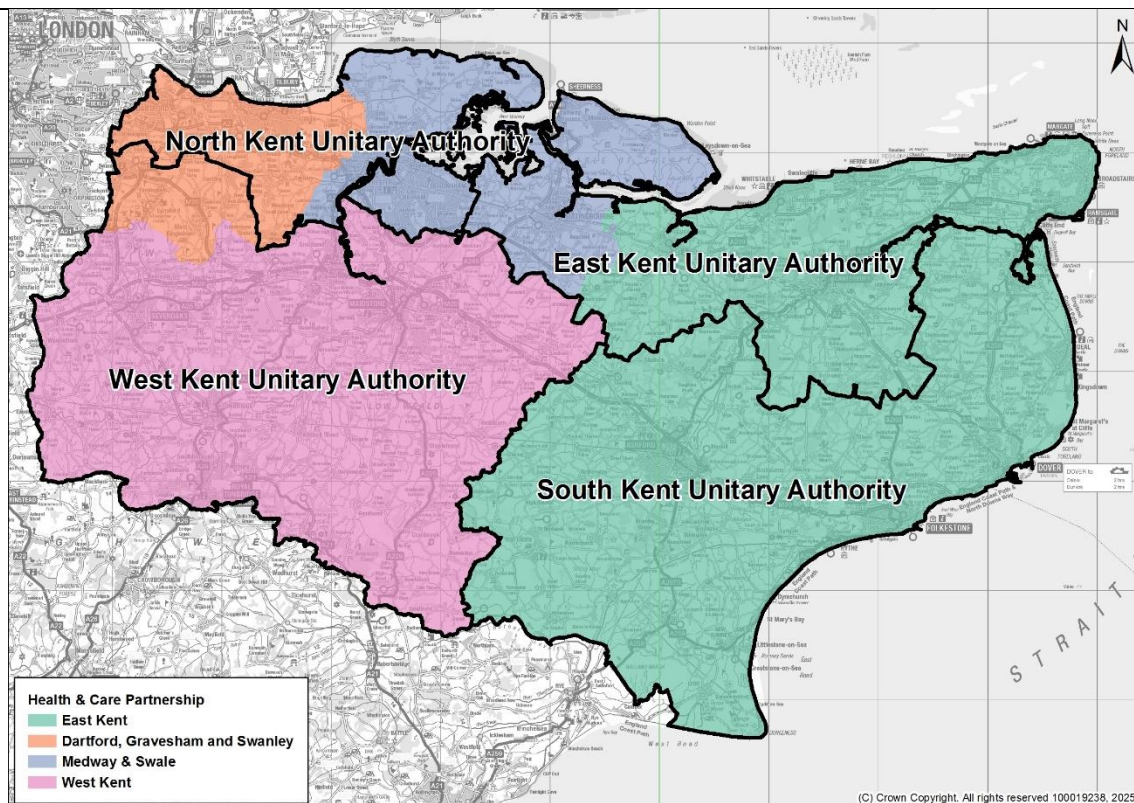


Population:

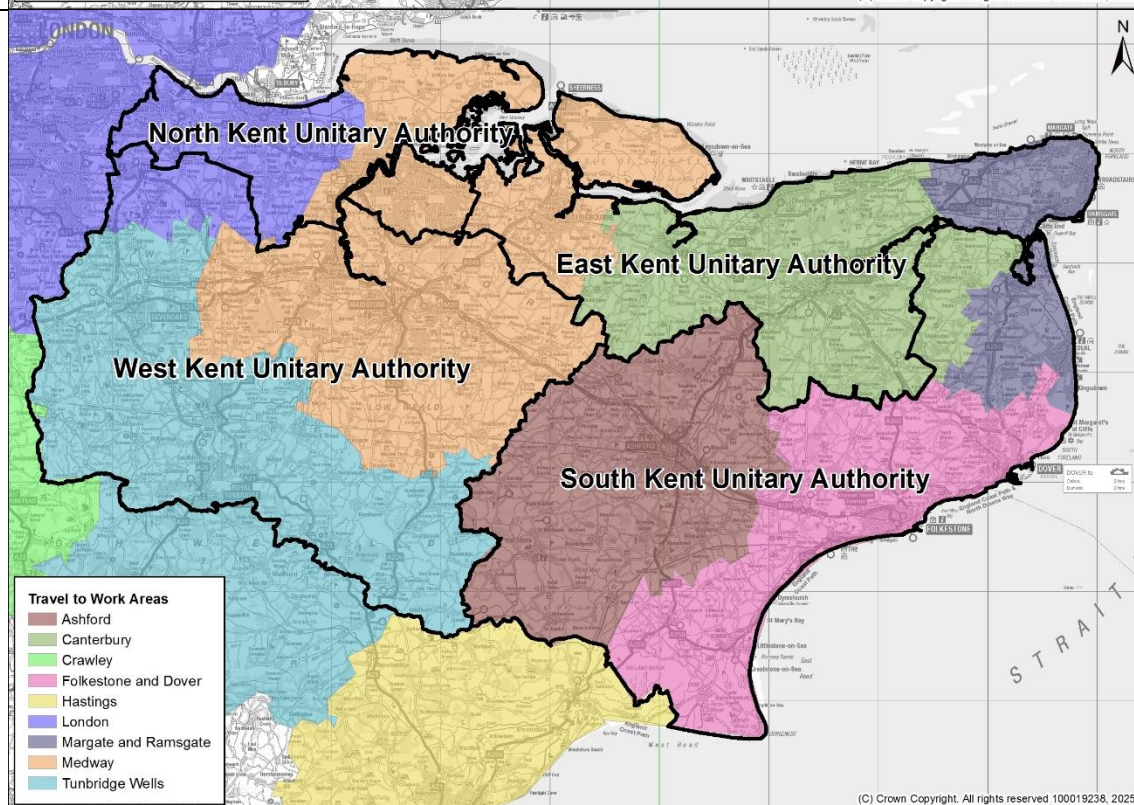
Potential Unitary	District	District population (mid-2022)	Unitary population (mid-2022)	Potential growth by 2035*
North Kent	Dartford	118,820	508,492	26k to 77k
	Gravesham	106,970		
	Medway	282,702		
East Kent	Canterbury	157,550	452,858	32k to 69k
	Swale	154,619		
	Thanet	140,689		
South Kent	Ashford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

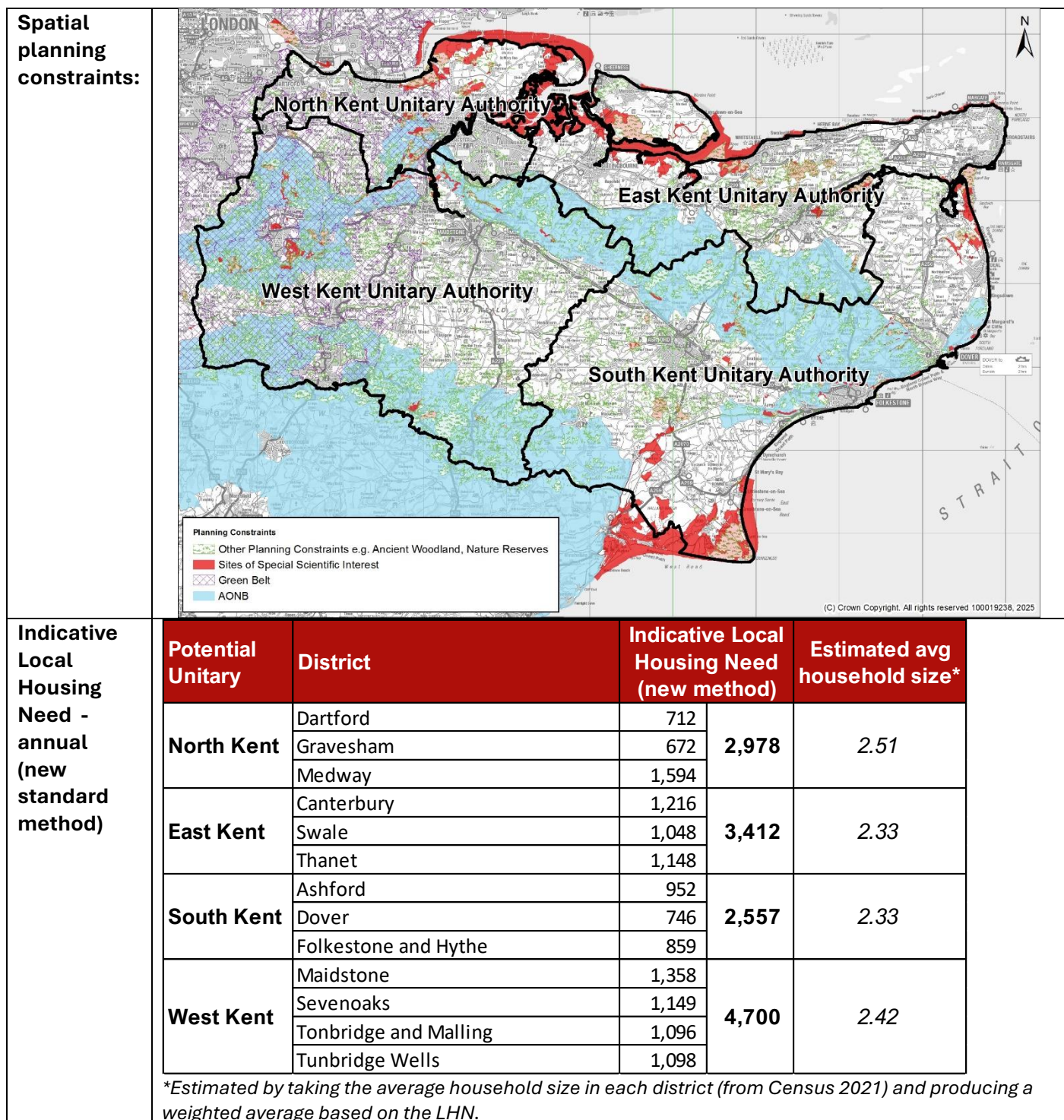
*Two estimates based off the % growth between 2022 and 2035 for each district from: a) the ONS Sub-National Population Projections and b) the KCC Housing Led Forecast. Weighted by each district's contribution towards the UA's total population (2022 MYE).

**NHS Health
& Care
Partnership
alignment:**



**Travel to
Work
Areas:**





Population composition

	North	East	South	West	Kent	England & Wales
Population aged 0-15	21.4%	17.9%	18.0%	19.8%	19.4%	18.4%
Population aged 16-64	62.6%	60.4%	59.0%	60.2%	60.7%	62.8%
Population aged 65+	16.0%	21.7%	23.0%	20.0%	19.9%	18.8%

*based on mid-2023 population estimate

Deprivation

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

	North	East	South	West	Kent
% LSOAs in top 10%	6.0%	13.9%	4.7%	0.6%	6.1%

Disability benefit claimants

Proportion of working age people claiming disability benefits (AA+DLA+PIP) from the DWP.

	North	East	South	West	Kent	England & Wales
% of 16-64s claiming AA/DLA/PIP	16.7%	22.0%	21.3%	14.6%	18.2%	17.2%

Unemployment

Proportion of people receiving benefits for unemployment (Jobseekers Allowance and out of work Universal Credit claimants)

	North	East	South	West	Kent	England & Wales
Unemployment: % of 18-64s claiming	4.2%	4.2%	3.6%	2.8%	3.7%	4.3%
Youth unemployment: % of 18-24s claiming	7.1%	6.0%	6.8%	4.6%	6.1%	5.5%

Qualifications (from Census 2021)

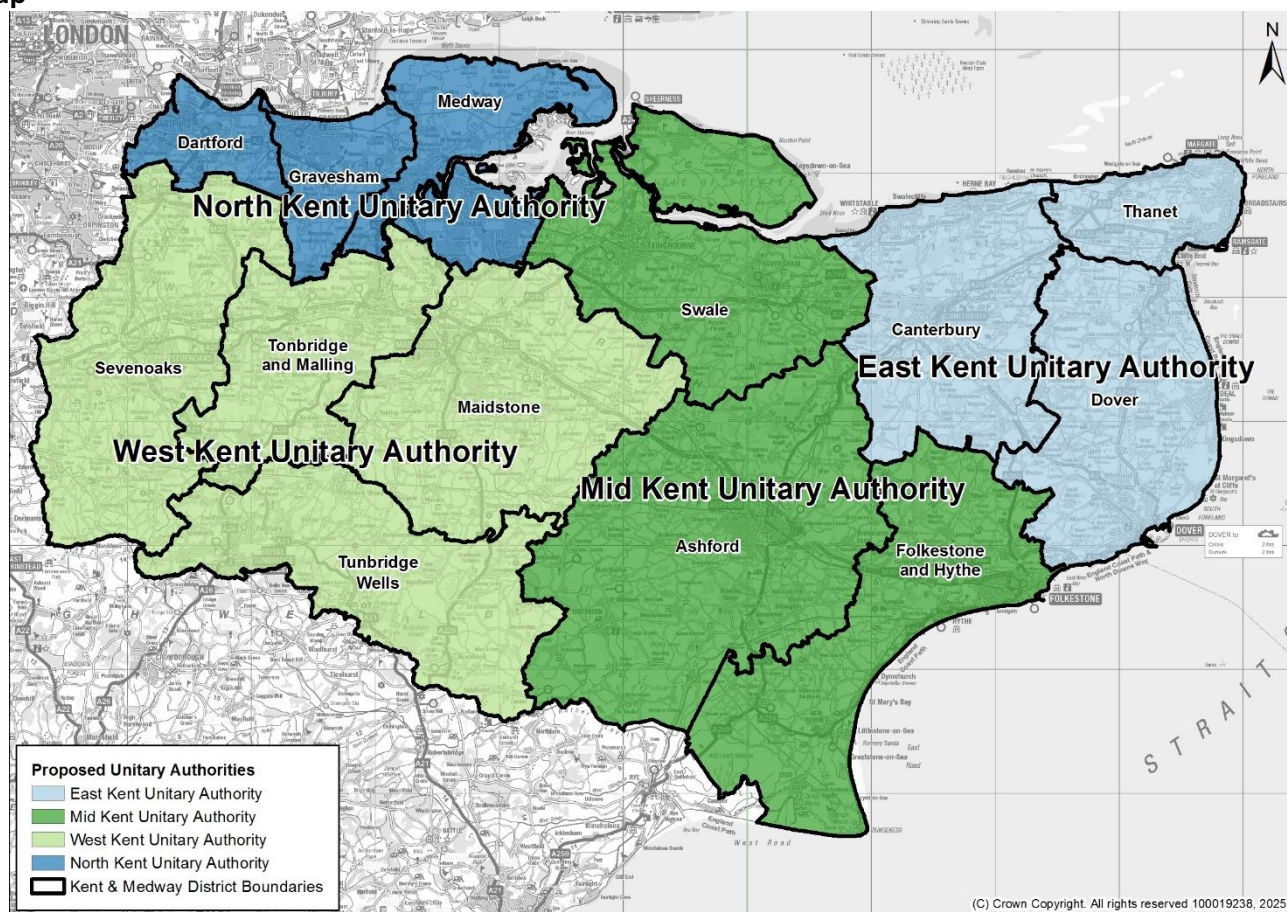
Highest level of Qualification of people aged 16+ from the 2021 Census.

	North	East	South	West	Kent	England & Wales
% with Level 2 qualification or higher	66.3%	66.4%	66.8%	71.6%	68.0%	69.4%
% with Level 4 qualification or higher	27.4%	27.9%	28.2%	34.6%	29.8%	33.8%

Model 3 (four unitaries, NEMidW)

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

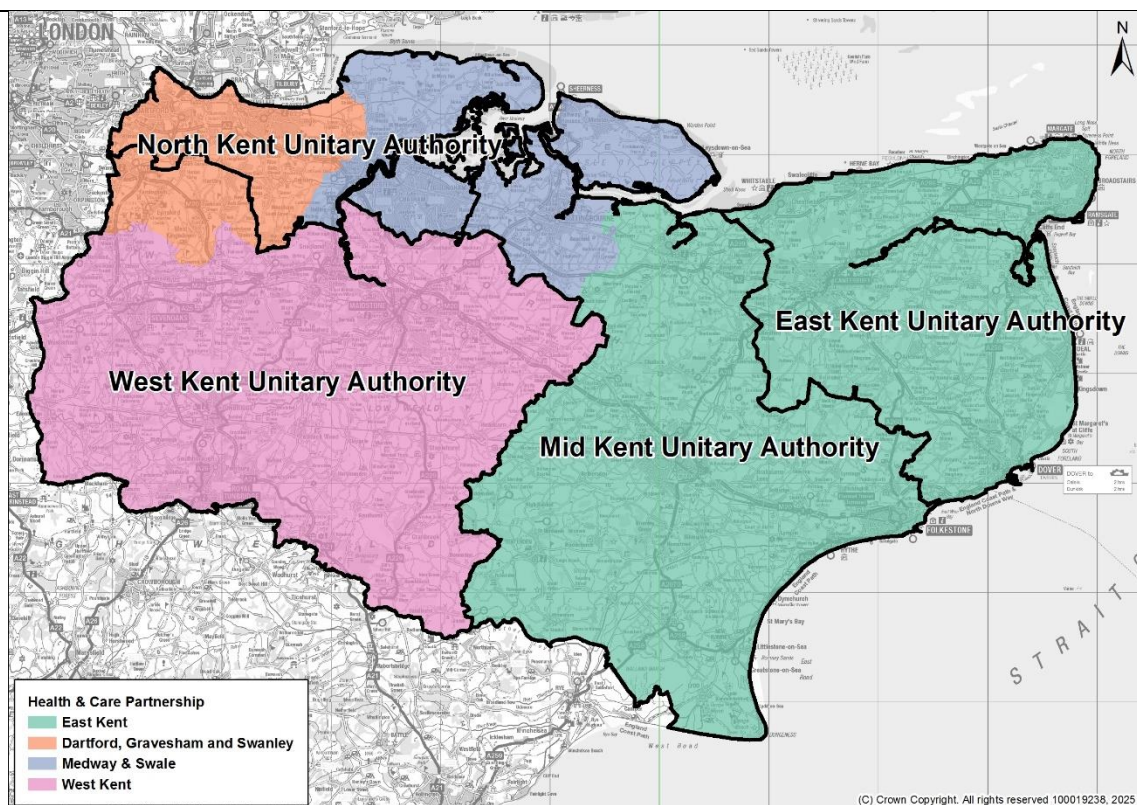


Population:

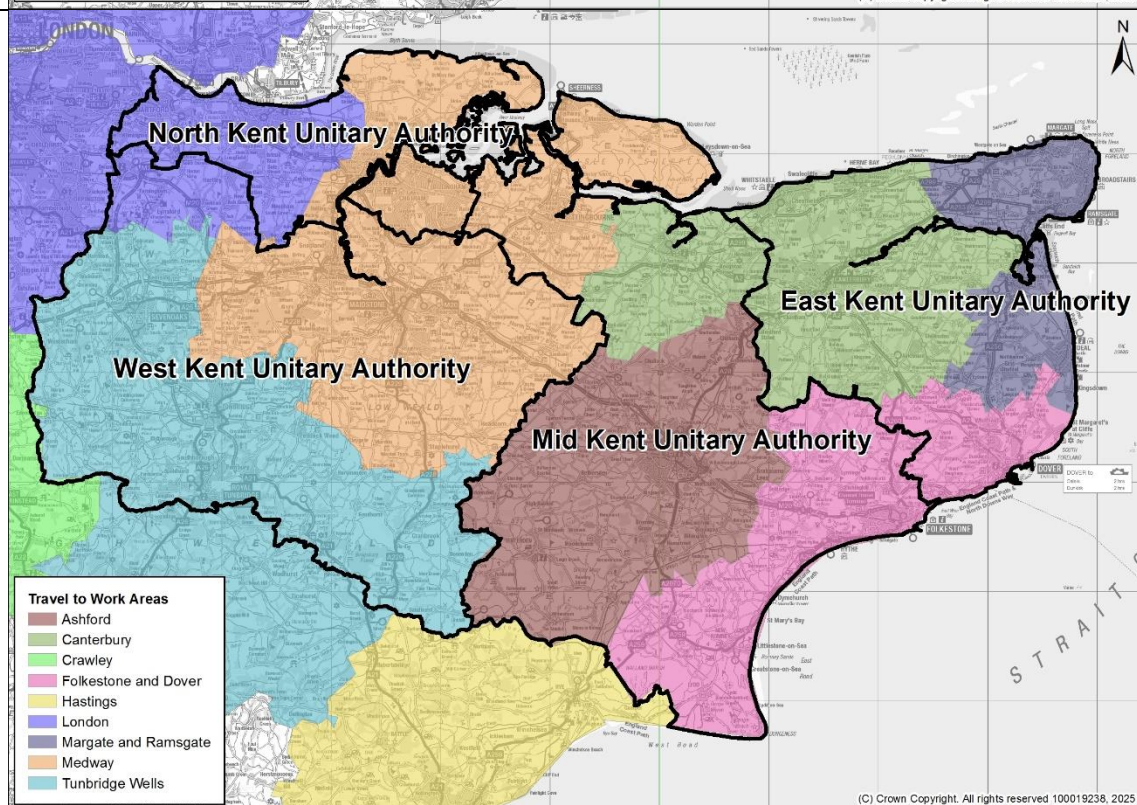
Potential Unitary	District	District population (mid-2022)	Unitary population (mid-2022)	Potential growth by 2035*
North Kent	Dartford	118,820	508,492	26k to 77k
	Gravesham	106,970		
	Medway	282,702		
East Kent	Canterbury	157,550	415,712	30k to 61k
	Dover	117,473		
	Thanet	140,689		
Mid Kent	Ashford	135,610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

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

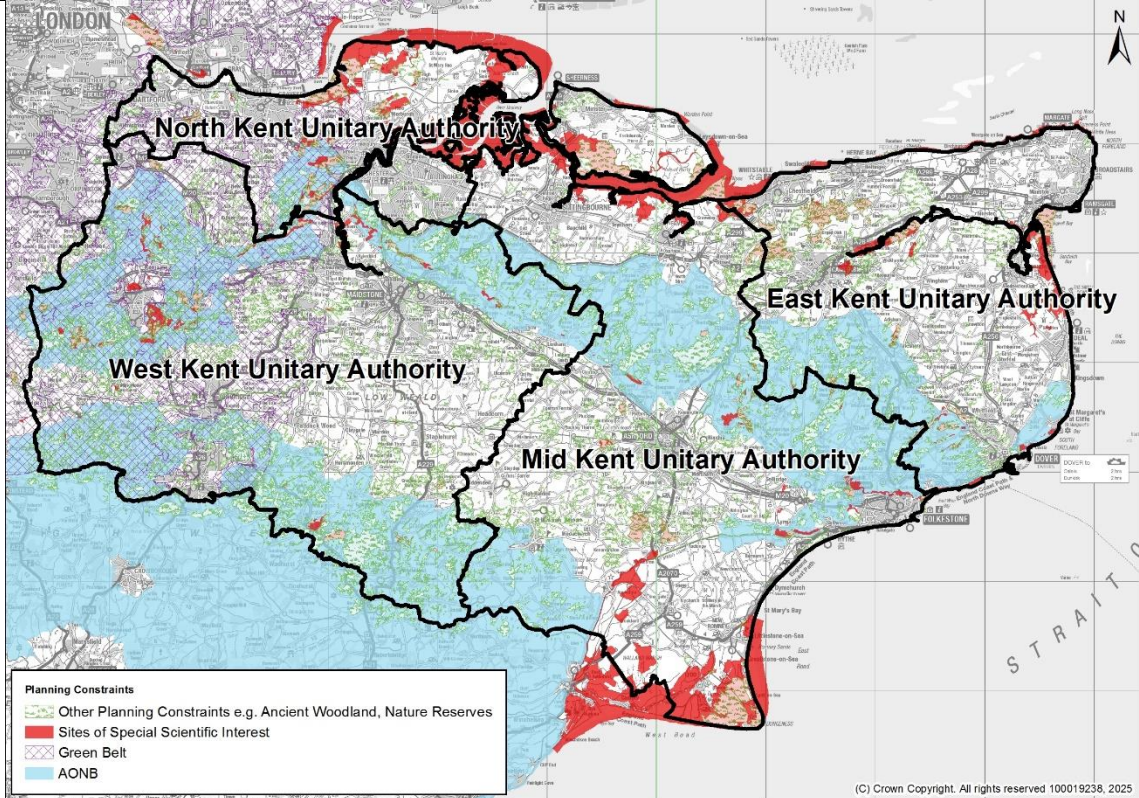
**NHS Health
& Care
Partnership
alignment:**



**Travel to
Work
Areas:**



Spatial planning constraints:



Planning Constraints

- Other Planning Constraints e.g. Ancient Woodland, Nature Reserves
- Sites of Special Scientific Interest
- Green Belt
- AONB

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Indicative Local Housing Need - annual (new standard method)

Potential Unitary	District	Indicative Local Housing Need (new method)		Estimated avg household size*
North Kent	Dartford	712	2,978	2.51
	Gravesham	672		
	Medway	1,594		
East Kent	Canterbury	1,216	3,110	2.28
	Dover	746		
	Thanet	1,148		
Mid Kent	Ashford	952	2,859	2.39
	Folkestone and Hythe	859		
	Swale	1,048		
West Kent	Maidstone	1,358	4,700	2.42
	Sevenoaks	1,149		
	Tonbridge and Malling	1,096		
	Tunbridge Wells	1,098		

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

Population composition

	North	East	Mid	West	Kent	England & Wales
Population aged 0-15	21.4%	17.1%	18.8%	19.8%	19.4%	18.4%
Population aged 16-64	62.6%	59.5%	60.1%	60.2%	60.7%	62.8%
Population aged 65+	16.0%	23.5%	21.1%	20.0%	19.9%	18.8%

*based on mid-2023 population estimate

Deprivation

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

	North	East	Mid	West	Kent
% LSOAs in top 10%	6.0%	10.4%	9.1%	0.6%	6.1%

Disability benefit claimants

Proportion of working age people claiming disability benefits (AA+DLA+PIP) from the DWP.

	North	East	Mid	West	Kent	England & Wales
% of 16-64s claiming AA/DLA/PIP	16.7%	22.6%	20.8%	14.6%	18.2%	17.2%

Unemployment

Proportion of people receiving benefits for unemployment (Jobseekers Allowance and out of work Universal Credit claimants)

	North	East	Mid	West	Kent	England & Wales
Unemployment: % of 18-64s claiming	4.2%	4.3%	3.7%	2.8%	3.7%	4.3%
Youth unemployment: % of 18-24s claiming	7.1%	6.1%	6.6%	4.6%	6.1%	5.5%

Qualifications (from Census 2021)

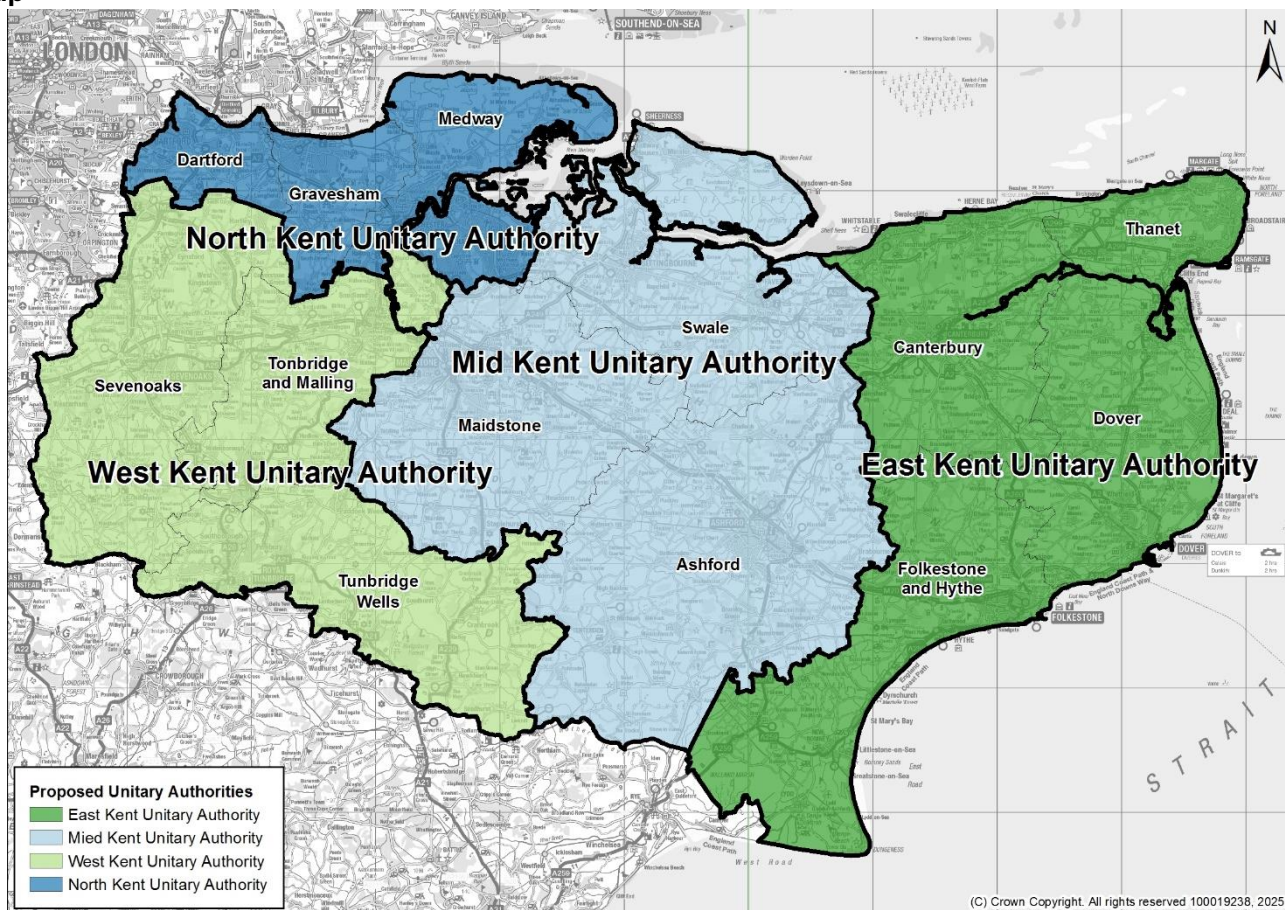
Highest level of Qualification of people aged 16+ from the 2021 Census.

	North	East	Mid	West	Kent	England & Wales
% with Level 2 qualification or higher	66.3%	67.7%	65.4%	71.6%	68.0%	69.4%
% with Level 4 qualification or higher	27.4%	29.1%	26.9%	34.6%	29.8%	33.8%

Model 4 (four unitaries, NEMidW)

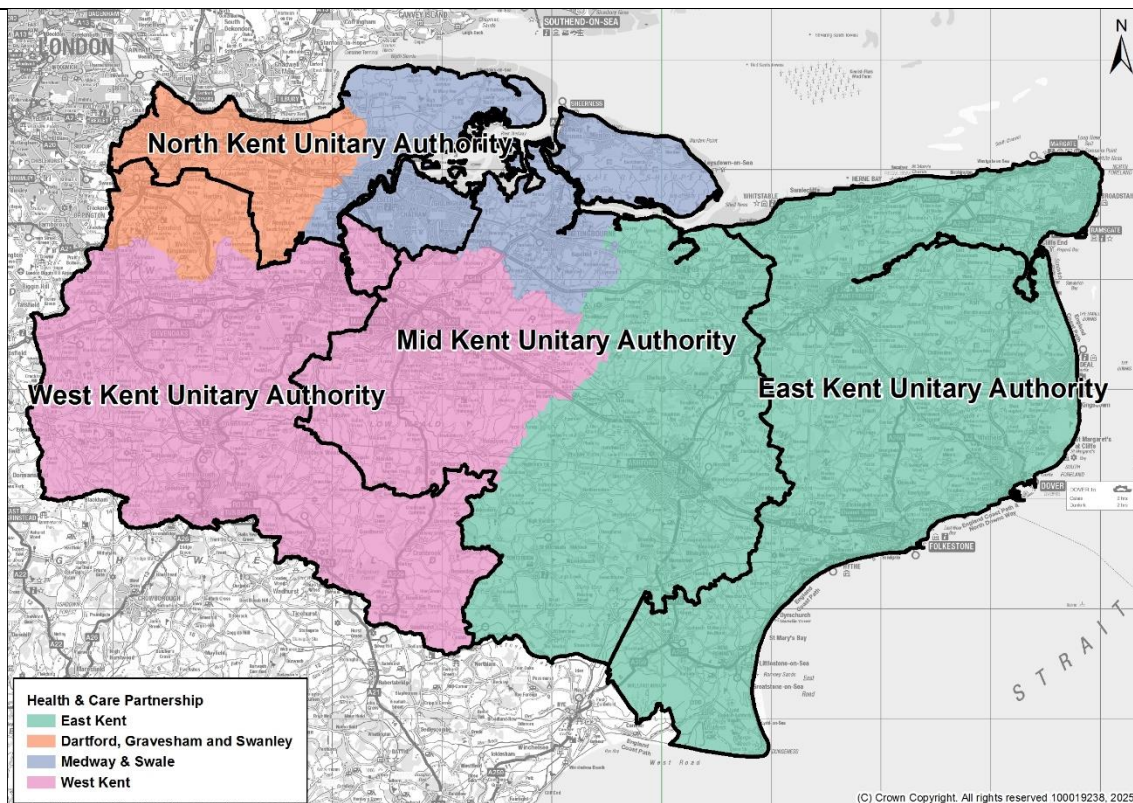
Model 4 (four unitaries, NEMidW):	North (Dartford, Gravesham, Medway) East (Canterbury, Dover, Folkestone and Hythe, Thanet) Mid (Ashford, Maidstone, Swale) West (Sevenoaks, Tonbridge and Malling, Tunbridge Wells)
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Map

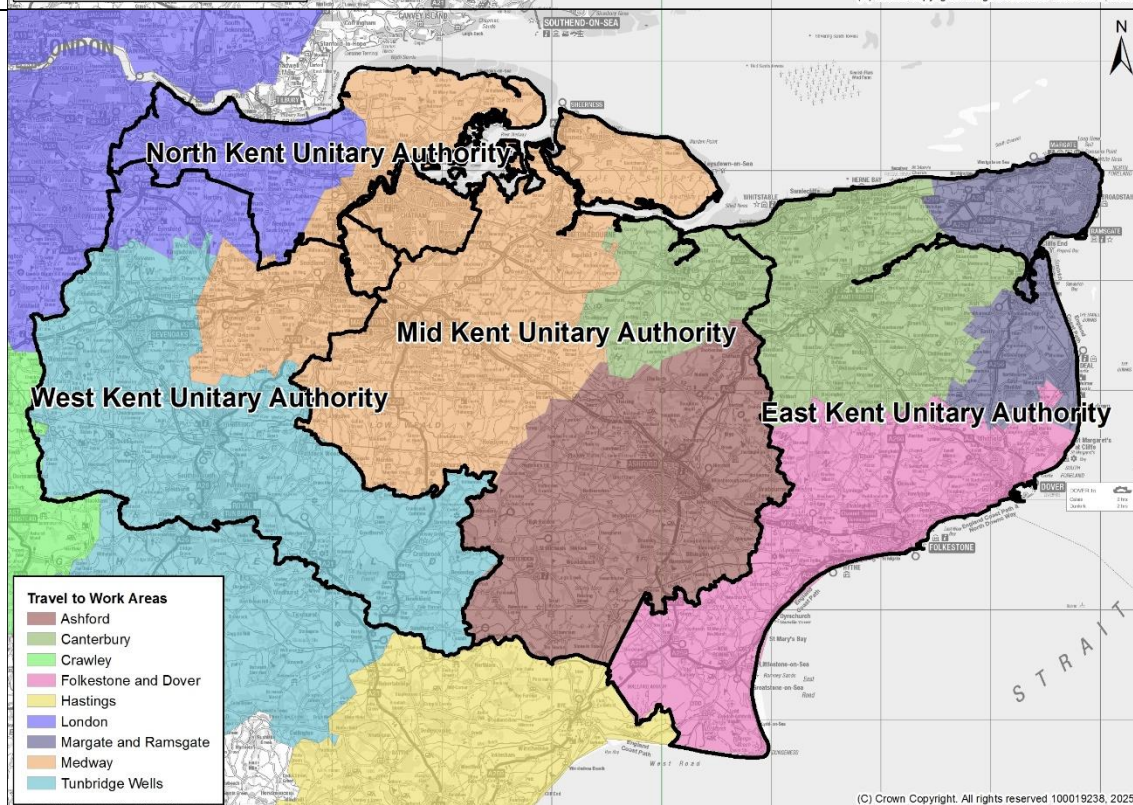


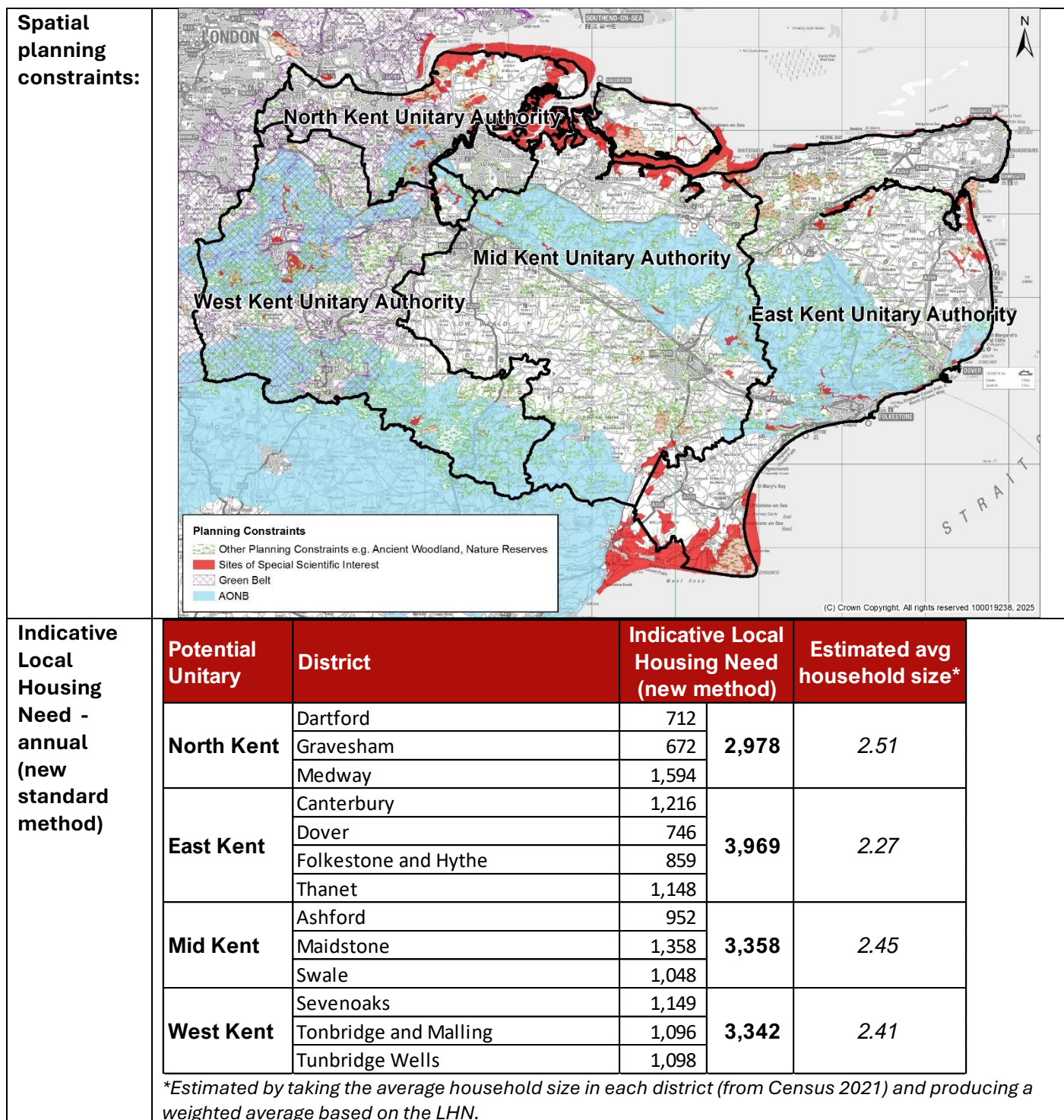
Population:	Potential Unitary	District	District population (mid-2022)	Unitary population (mid-2022)	Potential growth by 2035*
	North Kent	Dartford	118,820	508,492	26k to 77k
		Gravesham	106,970		
		Medway	282,702		
	East Kent	Canterbury	157,550	525,949	39k to 75k
		Dover	117,473		
		Folkestone and Hythe	110,237		
		Thanet	140,689		
	Mid Kent	Ashford	135,610	470,657	46k to 66k
		Maidstone	180,428		
		Swale	154,619		
	West Kent	Sevenoaks	121,106	370,795	21k to 52k
		Tonbridge and Malling	133,661		
		Tunbridge Wells	116,028		
*Two estimates based off the % growth between 2022 and 2035 for each district from: a) the ONS Sub-National Population Projections and b) the KCC Housing Led Forecast. Weighted by each district's contribution towards the UA's total population (2022 MYE).					

**NHS Health
& Care
Partnership
alignment:**



**Travel to
Work
Areas:**





Population composition

	North	East	Mid	West	Kent	England & Wales
Population aged 0-15	21.4%	16.9%	19.7%	19.9%	19.4%	18.4%
Population aged 16-64	62.6%	59.2%	61.1%	59.6%	60.7%	62.8%
Population aged 65+	16.0%	23.9%	19.2%	20.5%	19.9%	18.8%

*based on mid-2023 population estimate

Deprivation

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

	North	East	Mid	West	Kent
% LSOAs in top 10%	6.0%	9.4%	7.4%	0.0%	6.1%

Disability benefit claimants

Proportion of working age people claiming disability benefits (AA+DLA+PIP) from the DWP.

	North	East	Mid	West	Kent	England & Wales
% of 16-64s claiming AA/DLA/PIP	16.7%	23.0%	17.7%	14.4%	18.2%	17.2%

Unemployment

Proportion of people receiving benefits for unemployment (Jobseekers Allowance and out of work Universal Credit claimants)

	North	East	Mid	West	Kent	England & Wales
Unemployment: % of 18-64s claiming	4.2%	4.3%	3.4%	2.5%	3.7%	4.3%
Youth unemployment: % of 18-24s claiming	7.1%	6.4%	6.2%	3.8%	6.1%	5.5%

Qualifications (from Census 2021)

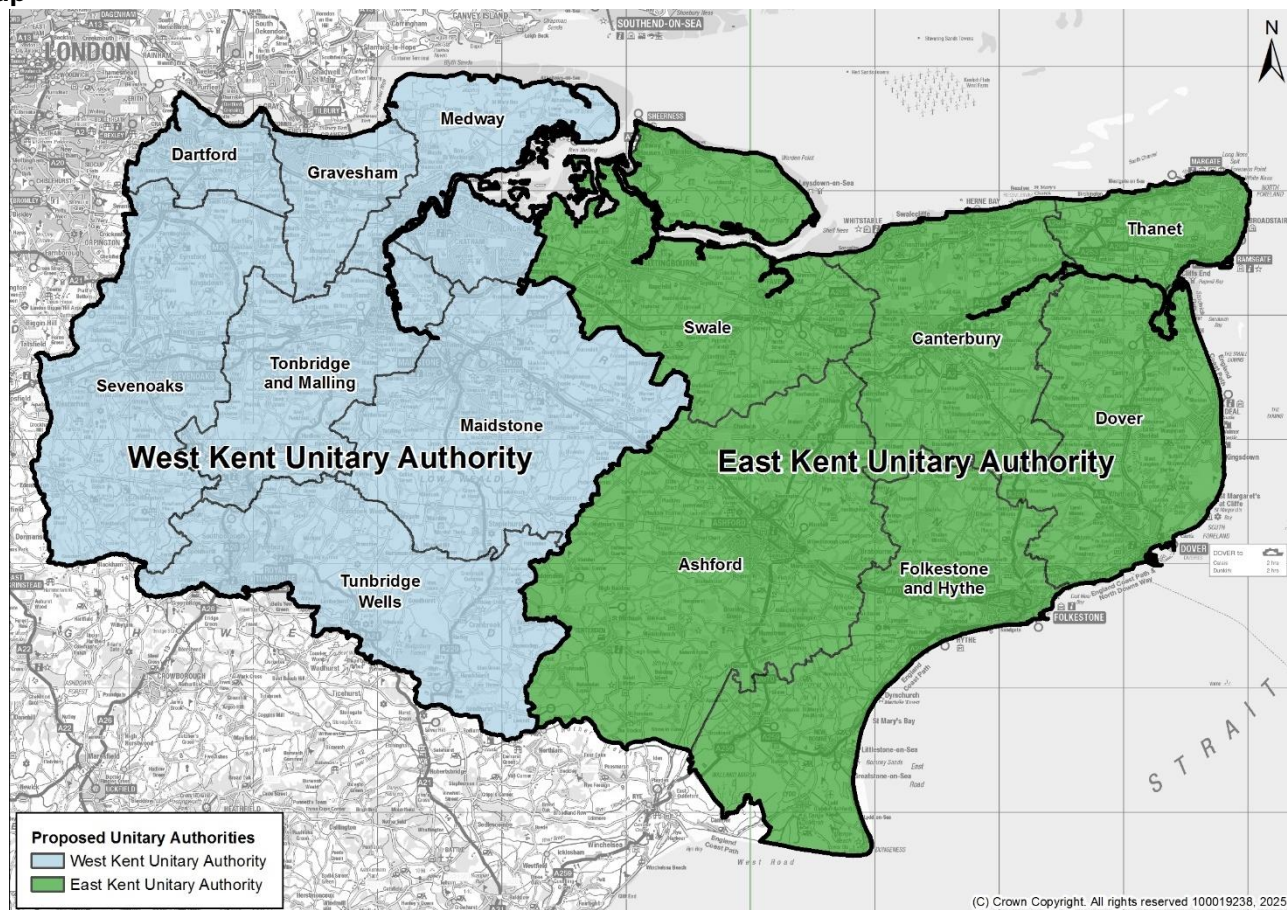
Highest level of Qualification of people aged 16+ from the 2021 Census.

	North	East	Mid	West	Kent	England & Wales
% with Level 2 qualification or higher	66.3%	67.3%	66.6%	73.0%	68.0%	69.4%
% with Level 4 qualification or higher	27.4%	28.7%	27.9%	36.8%	29.8%	33.8%

Model 5 (two unitaries, EW)

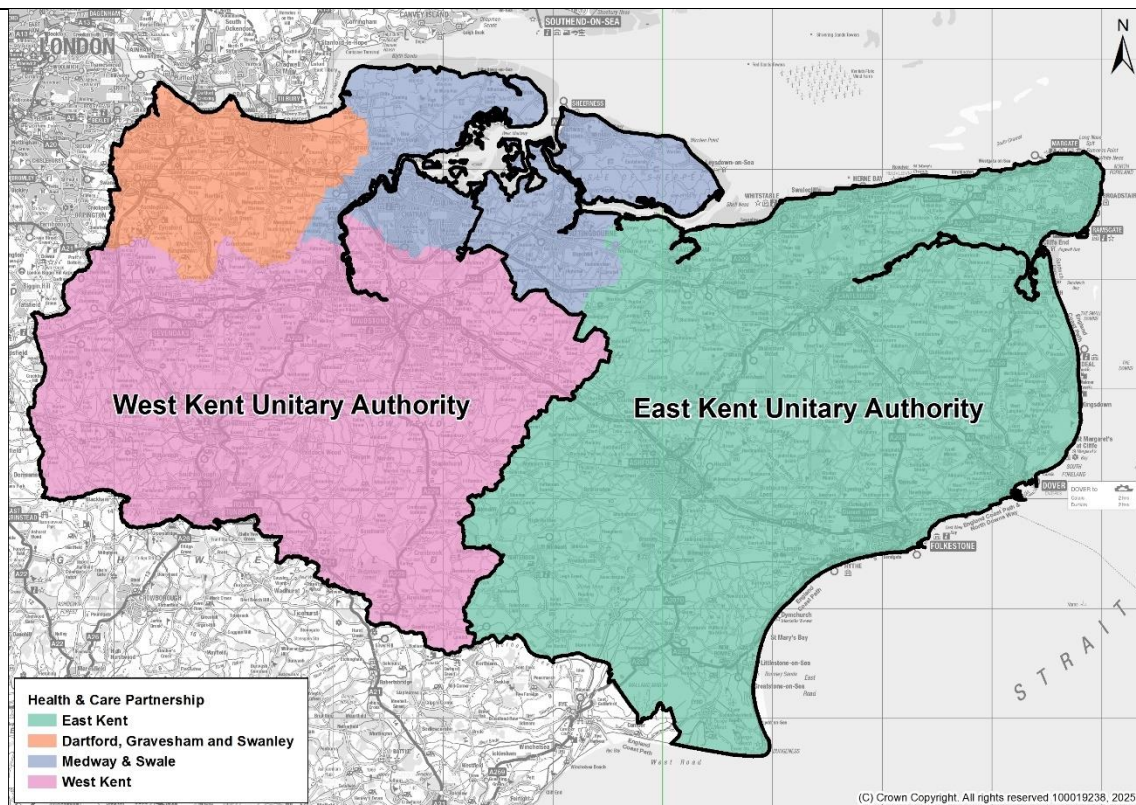
Model 5 (two unitaries, EW):	East (Ashford, Canterbury, Dover, Folkestone and Hythe, Swale, Thanet) West (Dartford, Gravesham, Maidstone, Medway, Sevenoaks, Tonbridge and Malling, Tunbridge Wells)
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Map

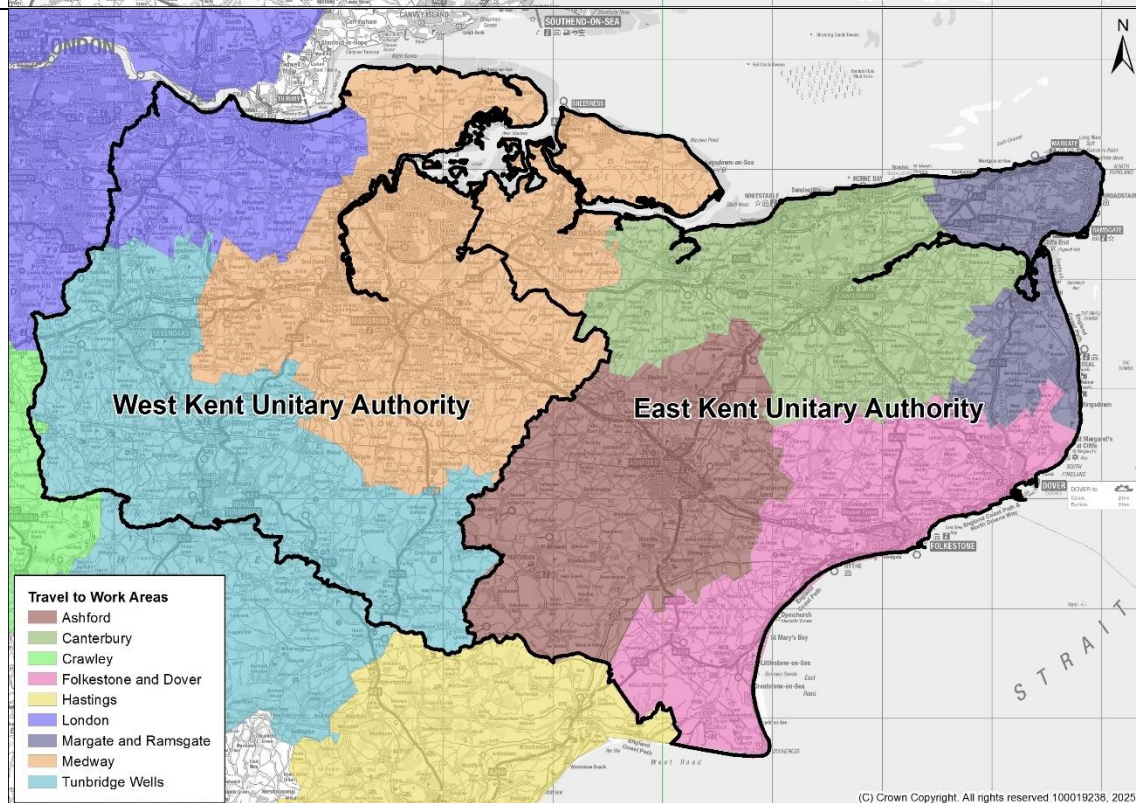


Population:	Potential Unitary	District	District population (mid-2022)	Unitary population (mid-2022)	Potential growth by 2035*
	East Kent	Ashford	135,610	816,178	67k to 121k
		Canterbury	157,550		
		Dover	117,473		
		Folkestone and Hythe	110,237		
		Swale	154,619		
		Thanet	140,689		
	West Kent	Dartford	118,820	1,059,715	65k to 149k
		Gravesham	106,970		
		Maidstone	180,428		
		Medway	282,702		
		Sevenoaks	121,106		
		Tonbridge and Malling	133,661		
		Tunbridge Wells	116,028		
	*Two estimates based off the % growth between 2022 and 2035 for each district from: a) the ONS Sub-National Population Projections and b) the KCC Housing Led Forecast. Weighted by each district's contribution towards the UA's total population (2022 MYE).				

**NHS Health
& Care
Partnership
alignment:**



**Travel to
Work
Areas:**



Spatial
planning
constraints
:

Planning Constraints

- Other Planning Constraints e.g. Ancient Woodland, Nature Reserves
- Sites of Special Scientific Interest
- Green Belt
- AONB

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Indicative
Local
Housing
Need -
annual
(new
standard
method)

Potential Unitary	District	Indicative Local Housing Need (new method)		Estimated avg household size*
East Kent	Ashford	952	5,969	2.33
	Canterbury	1,216		
	Dover	746		
	Folkestone and Hythe	859		
	Swale	1,048		
	Thanet	1,148		
West Kent	Dartford	712	7,677	2.45
	Gravesham	672		
	Maidstone	1,358		
	Medway	1,594		
	Sevenoaks	1,149		
	Tonbridge and Malling	1,096		
	Tunbridge Wells	1,098		

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

Population composition

	East	West	Kent	England & Wales
Population aged 0-15	17.9%	20.6%	19.4%	18.4%
Population aged 16-64	59.8%	61.4%	60.7%	62.8%
Population aged 65+	22.3%	18.1%	19.9%	18.8%

*based on mid-2023 population estimate

Deprivation

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

	East	West	Kent
% LSOAs in top 10%	9.8%	3.2%	6.1%

Disability benefit claimants

Proportion of working age people claiming disability benefits (AA+DLA+PIP) from the DWP.

	East	West	Kent	England & Wales
% of 16-64s claiming AA/DLA/PIP	21.7%	15.7%	18.2%	17.2%

Unemployment

Proportion of people receiving benefits for unemployment (Jobseekers Allowance and out of work Universal Credit claimants)

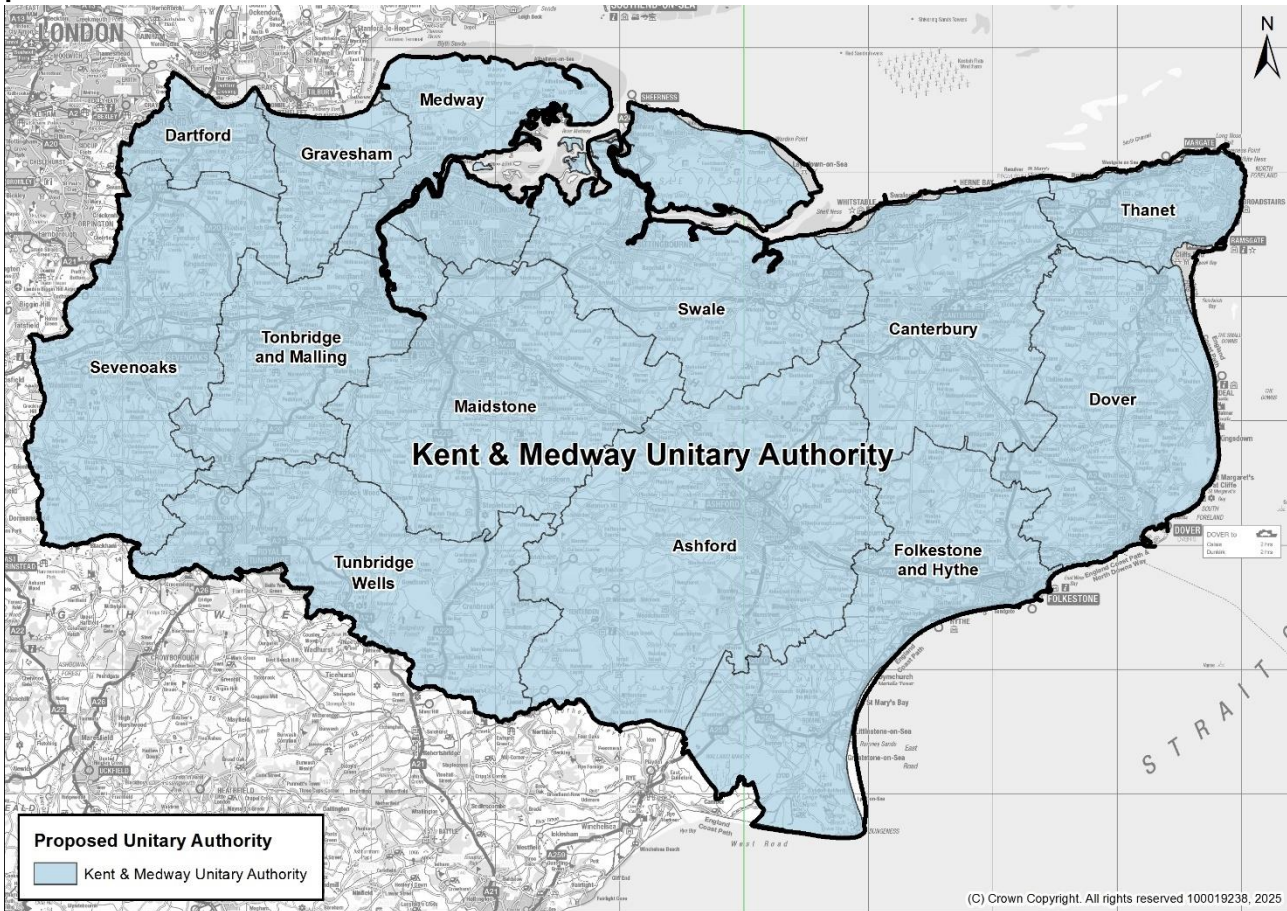
	East	West	Kent	England & Wales
Unemployment: % of 18-64s claiming	4.0%	3.5%	3.7%	4.3%
Youth unemployment: % of 18-24s claiming	6.3%	5.9%	6.1%	5.5%

Qualifications (from Census 2021)

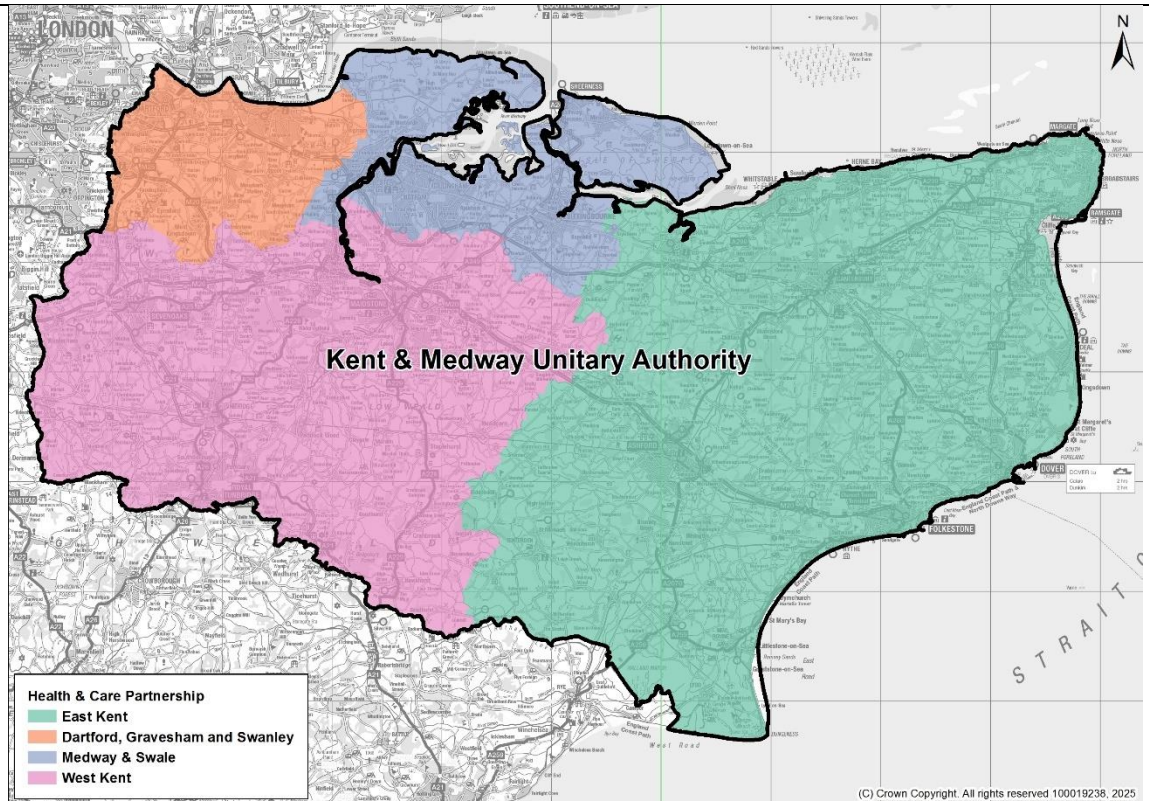
Highest level of Qualification of people aged 16+ from the 2021 Census.

	East	West	Kent	England & Wales
% with Level 2 qualification or higher	66.6%	69.1%	68.0%	69.4%
% with Level 4 qualification or higher	28.0%	31.1%	29.8%	33.8%

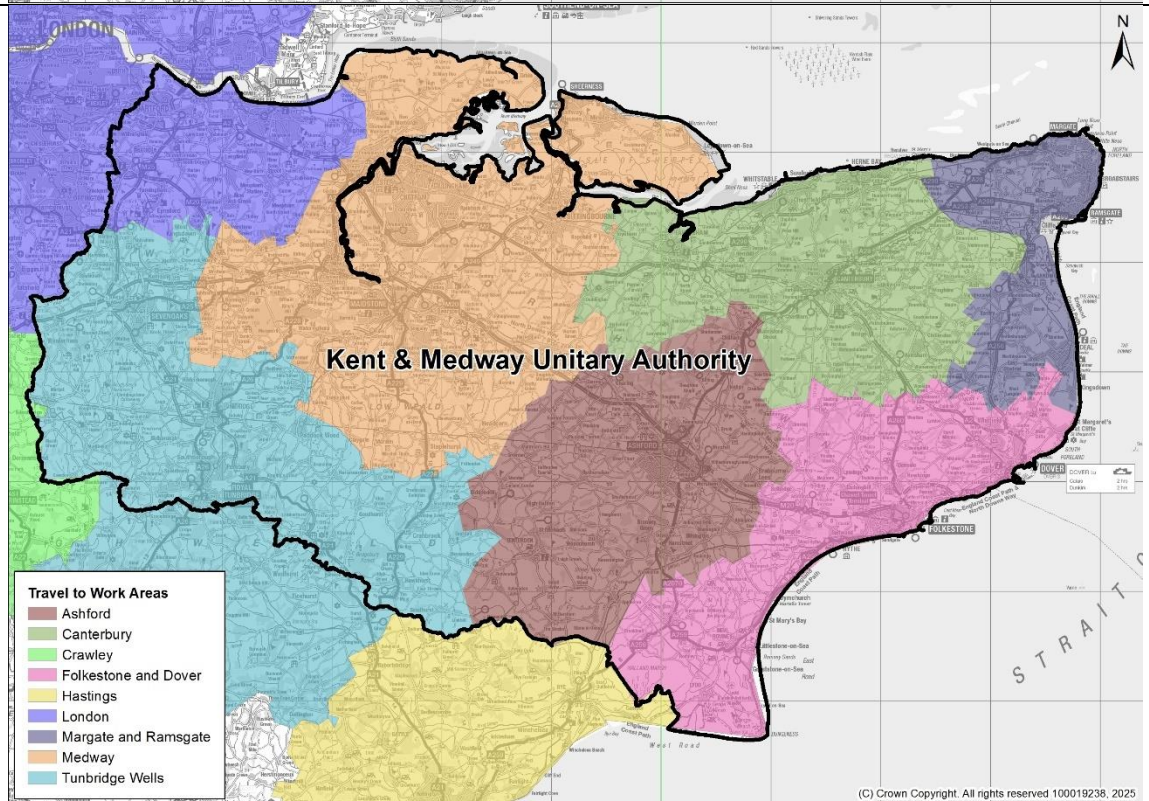
Model 6 (one unitary - benchmark, Kent)

Model 6 (one unitary, Kent):	Whole of Kent (including Medway)																																		
Map	 <p>The map displays the geographical boundaries of the Kent & Medway Unitary Authority. The area is shaded in light blue and includes the following districts: Dartford, Gravesham, Medway, Swale, Canterbury, Dover, Thanet, Maidstone, Ashford, Folkestone and Hythe, Tunbridge Wells, Tonbridge and Malling, and Sevenoaks. A legend in the bottom left corner identifies the shaded area as the 'Proposed Unitary Authority'. The map also shows surrounding areas like London to the west and the English Channel to the south.</p>																																		
Population:	<table><tr><th>Potential Unitary</th><th>District</th><th>District population (mid-2022)</th><th>Unitary population (mid-2022)</th><th>Potential growth by 2035*</th></tr><tr><td rowspan="13">Kent</td><td>Ashford</td><td>135,610</td><td rowspan="13">1,875,893</td><td rowspan="13">132k to 270k</td></tr><tr><td>Canterbury</td><td>157,550</td></tr><tr><td>Dartford</td><td>118,820</td></tr><tr><td>Dover</td><td>117,473</td></tr><tr><td>Folkestone and Hythe</td><td>110,237</td></tr><tr><td>Gravesham</td><td>106,970</td></tr><tr><td>Maidstone</td><td>180,428</td></tr><tr><td>Medway</td><td>282,702</td></tr><tr><td>Sevenoaks</td><td>121,106</td></tr><tr><td>Swale</td><td>154,619</td></tr><tr><td>Thanet</td><td>140,689</td></tr><tr><td>Tonbridge and Malling</td><td>133,661</td></tr><tr><td>Tunbridge Wells</td><td>116,028</td></tr></table>	Potential Unitary	District	District population (mid-2022)	Unitary population (mid-2022)	Potential growth by 2035*	Kent	Ashford	135,610	1,875,893	132k to 270k	Canterbury	157,550	Dartford	118,820	Dover	117,473	Folkestone and Hythe	110,237	Gravesham	106,970	Maidstone	180,428	Medway	282,702	Sevenoaks	121,106	Swale	154,619	Thanet	140,689	Tonbridge and Malling	133,661	Tunbridge Wells	116,028
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<p>*Two estimates based off the % growth between 2022 and 2035 for each district from: a) the ONS Sub-National Population Projections and b) the KCC Housing Led Forecast. Weighted by each district's contribution towards the UA's total population (2022 MYE).</p>																																			

**NHS Health
& Care
Partnership
alignment:**



**Travel to
Work
Areas:**



Spatial
planning
constraints
:

Planning Constraints

- Kent_and_Medway_Outline_BNG
- Other Planning Constraints e.g. Ancient Woodland, Nature Reserves
- Sites of Special Scientific Interest
- Green Belt
- AONB

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Indicative
Local
Housing
Need -
annual
(new
standard
method)

Potential Unitary	District	Indicative Local Housing Need (new method)	Estimated avg household size*	
Kent	Ashford	952	13,647	2.40
	Canterbury	1,216		
	Dartford	712		
	Dover	746		
	Folkestone and Hythe	859		
	Gravesham	672		
	Maidstone	1,358		
	Medway	1,594		
	Sevenoaks	1,149		
	Swale	1,048		
	Thanet	1,148		
	Tonbridge and Malling	1,096		
	Tunbridge Wells	1,098		

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

Population composition

	Kent	England & Wales
Population aged 0-15	19.4%	18.4%
Population aged 16-64	60.7%	62.8%
Population aged 65+	19.9%	18.8%

*based on mid-2023 population estimate

Deprivation

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

	Kent
% LSOAs in top 10%	6.1%

Disability benefit claimants

Proportion of working age people claiming disability benefits (AA+DLA+PIP) from the DWP.

	Kent	England & Wales
% of 16-64s claiming AA/DLA/PIP	18.2%	17.2%

Unemployment

Proportion of people receiving benefits for unemployment (Jobseekers Allowance and out of work Universal Credit claimants)

	Kent	England & Wales
Unemployment: % of 18-64s claiming	3.7%	4.3%
Youth unemployment: % of 18-24s claiming	6.1%	5.5%

Qualifications (from Census 2021)

Highest level of Qualification of people aged 16+ from the 2021 Census.

	Kent	England & Wales
% with Level 2 qualification or higher	68.0%	69.4%
% with Level 4 qualification or higher	29.8%	33.8%

Local Government Reorganisation Models – Housing Targets, Delivery & Projections

Introduction

The aim of this document is to support KCC's internal research on Local Government Reorganisation in Kent and Medway. The ability of the proposed unitary authorities to deliver on housing targets is part of the evidence base that is required in the final proposal to government and is the focus of this report.

This document brings together data from the 12 districts councils in Kent, Medway Council and the Ministry of Housing, Communities and Local Government to examine the proposed housing targets for the 5 models, the developments that have been identified to meet these targets and the authorities' track record of delivering housing between 2017 and 2023. This analysis assumes that the proposed housing targets for new unitary authorities would reflect the targets of their constituent districts.

The 5 unitary authority models that are considered in this document are described below.

Model 1: A three unitary model made up as follows: West (Sevenoaks, Tonbridge and Malling, Tunbridge Wells and Maidstone); North (Dartford, Gravesham, Medway and Swale); East (Canterbury, Thanet, Ashford, Dover, Folkestone & Hythe).

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

Model 3: A four unitary model made up as follows: Mid (Ashford, Swale, Folkestone and Hythe); West (Sevenoaks, Tonbridge and Malling, Tunbridge Wells and Maidstone,); North (Dartford, Gravesham, Medway); East (Canterbury, Dover, Thanet)

Model 4: A four unitary model made up as follows: Mid (Ashford, Swale, Maidstone); West (Sevenoaks, Tonbridge and Malling, Tunbridge Wells); North (Dartford, Gravesham, Medway); East (Canterbury, Dover, Folkestone and Hythe, Thanet)

Model 5: A two unitary authority model made up as follows: West (Sevenoaks, Tonbridge and Malling, Tunbridge Wells, Maidstone, Dartford, Gravesham and Medway); East (Canterbury, Swale, Ashford, Thanet, Dover, Folkestone and Hythe)

Analysis

In July 2024 the government released new proposed housing targets for local authorities for the 2025 calendar year onwards based on a new methodology.¹ Table 1 shows the new annual housing targets for the 12 districts in Kent plus Medway which were finalised in the revised National Planning Policy Framework in December 2024².

Table 1: New Housing Targets per District/Local Authority (2025)

District/ Unitary Authority	New Annual Housing Target (2025)
Ashford	949
Canterbury	1,178
Dartford	716
Dover	789
Folkestone and Hythe	838
Gravesham	693
Maidstone	1,344
Medway	1,644
Sevenoaks	1,113
Swale	1,061
Thanet	1,145
Tonbridge and Malling	1,057
Tunbridge Wells	1,045

Table 2 shows what this new annual housing target would be for each of the 5 unitary authority models and compares this with the average number of dwellings completed each year between 2017-2023. This is based on data in the Housing Delivery Test³ data from the Ministry of Housing, Communities and Local Government . This table shows the annual surplus/shortfall in each Unitary Authority model for the new housing targets if the average number of dwellings built annually over the last 6 years continued into the future.

Over the last 6 years, an average of 8,450 housing units have been completed across Kent & Medway each year compared to the new target of 13,572, a deficit of 5,122 houses with a completion rate of 62.3% of the new target. Model 4 has the biggest percentage point gap between the proposed unitary authority with the highest historic completion rate compared to the new target and the proposed unitary authority with the lowest completion rate, 88% compared to 45.3%. Model 5 has the smallest gap in the historic completion rate compared to this new target for the proposed unitary authorities, with East Kent and West Kent reporting 62.0% and 62.5% respectively. Model 1 has the second smallest gap with East Kent at 59.1% and North Kent at 67.5%.

¹ [Mapped: Housing targets for each council under proposed method | Local Government Chronicle \(LGC\)](#)

² [National Planning Policy Framework](#)

³ [Housing Delivery Test: 2023 measurement - GOV.UK](#)

Table 2: New Annual Housing Target Compared to Average Annual Housing Units Delivered 2017-2023

LGR Model 1	New Annual Housing Target	Average Annual Housing Delivered (2017-2023)	Surplus/Shortfall Annual Average Housing Delivery 2017-2023 v New Target	% of New Annual Target Delivered Annually (2017-2023)
East Kent	4,899	2,895	-2,004	59.1%
North Kent	4,114	2,777	-1,337	67.5%
West Kent	4,559	2,778	-1,781	60.9%
Total	13,572	8,450	-5,122	62.3%

LGR Model 2	New Annual Housing Target	Average Annual Housing Delivered (2017-2023)	Surplus/Shortfall Annual Average Housing Delivery 2017-2023 v New Target	% of New Annual Target Delivered Annually (2017-2023)
East Kent	3,384	1,906	-1,478	56.3%
North Kent	3,053	1,977	-1,076	64.8%
South Kent	2,576	1,788	-788	69.4%
West Kent	4,559	2,778	-1,781	60.9%
Total	13,572	8,450	-5,122	62.3%

LGR Model 3	New Annual Housing Target	Average Annual Housing Delivered (2017-2023)	Surplus/Shortfall Annual Average Housing Delivery 2017-2023 v New Target	% of New Annual Target Delivered Annually (2017-2023)
East Kent	3,112	1,604	-1,508	51.6%
Mid Kent	2,848	2,090	-758	73.4%
North Kent	3,053	1,977	-1,076	64.8%
West Kent	4,559	2,778	-1,781	60.9%
Total	13,572	8,450	-5,122	62.3%

LGR Model 4	New Annual Housing Target	Average Annual Housing Delivered (2017-2023)	Surplus/Shortfall Annual Average Housing Delivery 2017-2023 v New Target	% of New Annual Target Delivered Annually (2017-2023)
East Kent	3,950	2,064	-1,886	52.3%
Mid Kent	3,354	2,951	-403	88.0%
North Kent	3,053	1,977	-1,076	64.8%
West Kent	3,215	1,457	-1,758	45.3%
Total	13,572	8,450	-5,122	62.3%

LGR Model 5	New Annual Housing Target	Average Annual Housing Delivered (2017-2023)	Surplus/Shortfall Annual Average Housing Delivery 2017-2023 v New Target	% of New Annual Target Delivered Annually (2017-2023)
East Kent	5,960	3,694	-2,266	62.0%
West Kent	7,612	4,755	-2,857	62.5%
Total	13,572	8,450	-5,122	62.3%

The 12 district councils and Medway Council provide Kent with information on the phased housing supply sites that has been identified for development over the next few years. This is collated in the Housing Information Audit⁴. Table 3 compares the total housing target⁵ over the next four years (2025/26-2028/29) against this housing supply for the 5 unitary authority models. This shows that overall 48,532 units have been identified and are phased to be developed over this period compared to a target of 54,288, a deficit of 5,936 units.

The proposed unitary authorities East Kent and South Kent have sufficient sites identified to meet the proposed target in all scenarios, whereas West Kent reports significant shortfalls. Model 4 has the largest percentage point gap between the proposed unitary authority with the biggest surplus and the unitary authority with the biggest shortfall, a gap of 44.4 percentage points between East Kent (110.1%) and West Kent (63.6%). Model 5 has the smallest percentage point gap with East Kent reporting a forecast 105.9% completion rate compared to 75.9% for West Kent.

Table 3: New Annual Housing Target Compared to Phased Housing Supply 2017-2023

LGR Model 1	4 Year Housing Target*	4 Year Housing Supply 2025/2026 - 2028/2029	Surplus/Shortfall of 4 Year Target v Identified Sites	% of 4 Year Target Identified
East Kent	19,596	21,285	1,689	108.6%
North Kent	16,456	14,885	-1,571	90.5%
West Kent	18,236	12,182	-6,054	66.8%
Total	54,288	48,352	-5,936	89.1%

LGR Model 2	4 Year Housing Target*	4 Year Housing Supply 2025/2026 - 2028/2029	Surplus/Shortfall of 4 Year Target v Identified Sites	% of 4 Year Target Identified
East Kent	13,536	14,561	1,025	107.6%
North Kent	12,212	10,922	-1,290	89.4%
South Kent	10,304	10,687	383	103.7%
West Kent	18,236	12,182	-6,054	66.8%

⁴ [Five year land supply](#)

^{5*} This assumes that the current target is replicated over the next 3 years but are subject to revision by the MCHLG

Total	54,288	48,352	-5,936	89.1%
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LGR Model 3	4 Year Housing Target*	4 Year Housing Supply 2025/2026 - 2028/2029	Surplus/Shortfall of 4 Year Target v Identified Sites	% of 4 Year Target Identified
East Kent	12,448	13,848	1,400	111.2%
Mid Kent	11,392	11,400	8	100.1%
North Kent	12,212	10,922	-1,290	89.4%
West Kent	18,236	12,182	-6,054	66.8%
Total	54,288	48,352	-5,936	89.1%

LGR Model 4	4 Year Housing Target*	4 Year Housing Supply 2025/2026 - 2028/2029	Surplus/Shortfall of 4 Year Target v Identified Sites	% of 4 Year Target Identified
East Kent	15,800	17,395	1,595	110.1%
Mid Kent	13,416	11,852	-1,564	88.3%
North Kent	12,212	10,922	-1,290	89.4%
West Kent	12,860	8,183	-4,677	63.6%
Total	54,288	48,352	-5,936	89.1%

LGR Model 5	4 Year Housing Target*	4 Year Housing Supply 2025/2026 - 2028/2029	Surplus/Shortfall of 4 Year Target v Identified Sites	% of 4 Year Target Identified
East Kent	23,840	25,248	1,408	105.9%
West Kent	30,448	23,104	-7,344	75.9%
Total	54,288	48,352	-5,936	89.1%

Summary of most challenging unitary areas

Table 4 shows the most challenging proposed unitary authority for each of the 5 models for the two key measures included in this report, the percentage of the new annual housing target that has been delivered on average over the last six years and the percentage of the four year housing target that has been identified for development and has been included in the Housing Information Audit.

Table 4: Most Challenging Unitary Authority for Each Local Government Reorganisation Option

LGR Model	% of New Annual Target Delivered Annually (2017-2023)	% of 4 Year Housing Target Identified in Housing Information Audit
Model 1 – 3 UAs	East Kent - 59%	West Kent - 67%
Model 2 – 4 UAs	East Kent - 56%	West Kent - 67%
Model 3 – 4 UAs	East Kent - 52%	West Kent - 67%
Model 4 – 4 UAs	West Kent - 45%	West Kent - 64%
Model 5 – 2 UAs	East Kent - 62%	West Kent - 76%
Kent & Medway	Kent - 62%	Kent - 89%

It should be noted that grouping up districts can result in housing delivery challenges in some areas to be masked by other more successful areas. This doesn't necessarily resolve local housing need in the areas that most need it when looking at a smaller geographical scale.

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