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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

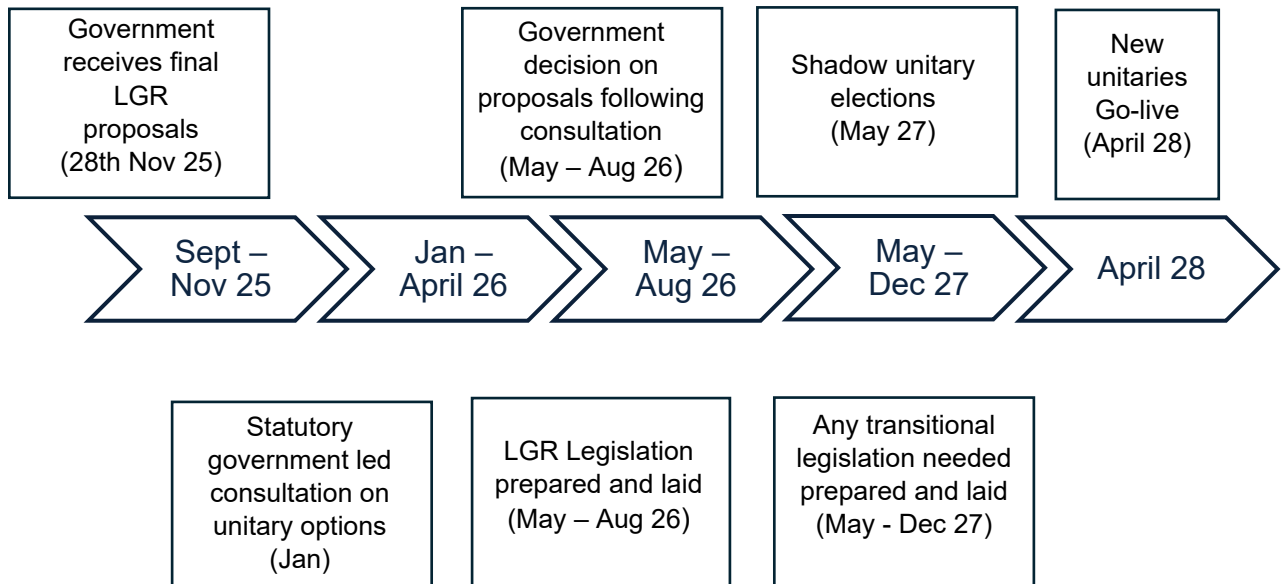
- 1.8 Kent and Medway Councils submitted a joint request to MHCLG on 10 January 2025 for the area to be included in the Devolution Priority Programme (DPP) which has been set up to allow some areas to progress devolution as quickly as possible. On 5 February DPP areas were announced and Kent and Medway 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

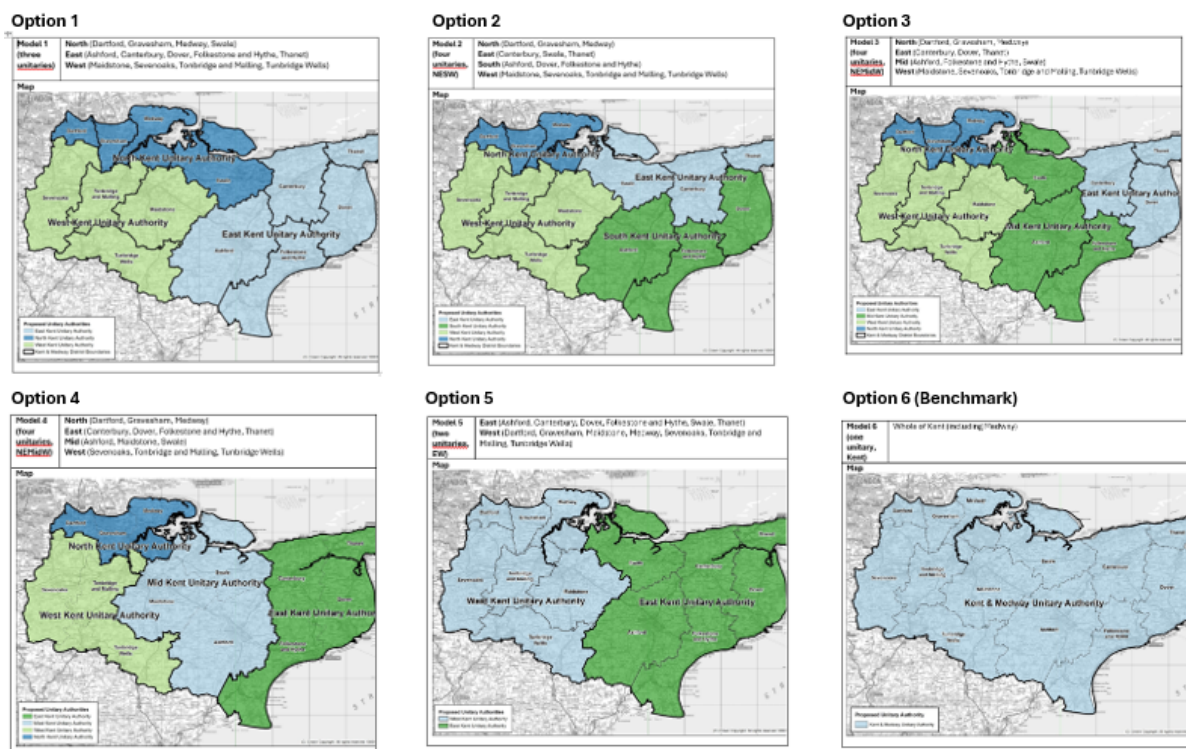
4.1 The internal options appraisal has used the Government criteria which were set out in the schedule attached to the statutory invitation letter for LGR proposals.

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

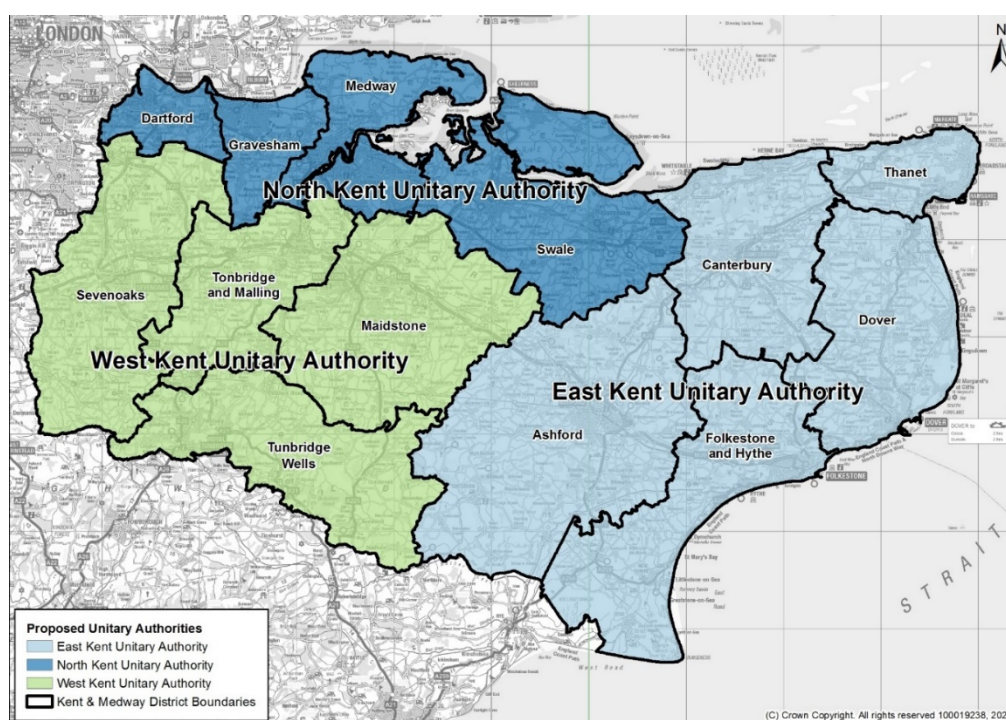
4.10 Appendix 2 provides a detailed rationale for the scoring, explaining why each individual score was given, drawing on the relevant evidence from the evidence base.

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.

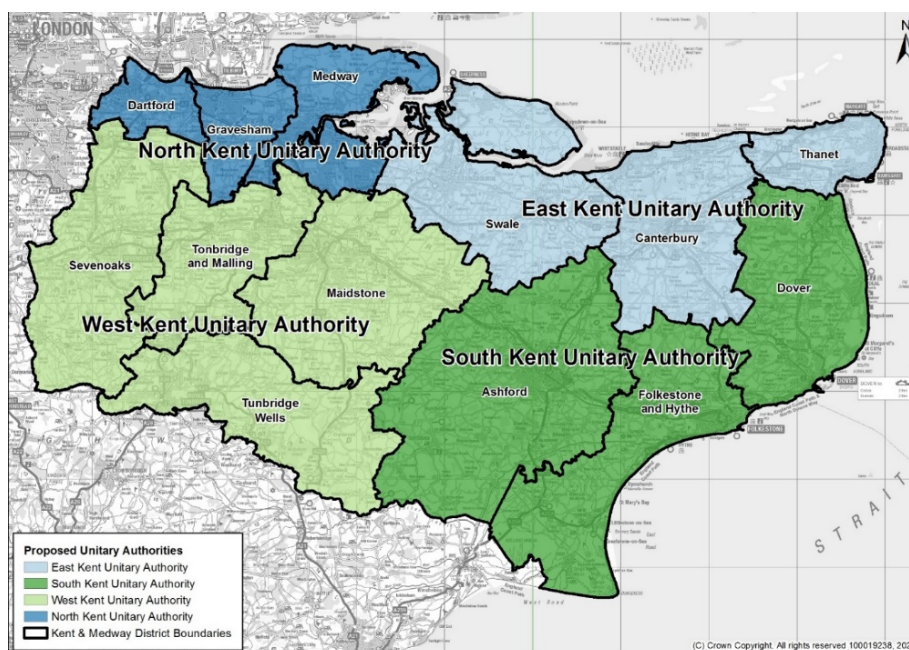
Option 1 creates unitary authorities that best meet the Government's requirement for populations and the populations in this option are also the most balanced, which would support the creation of equal partners under Mayoral Strategic Authority (MSA). The unitaries in this option are functional economic 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

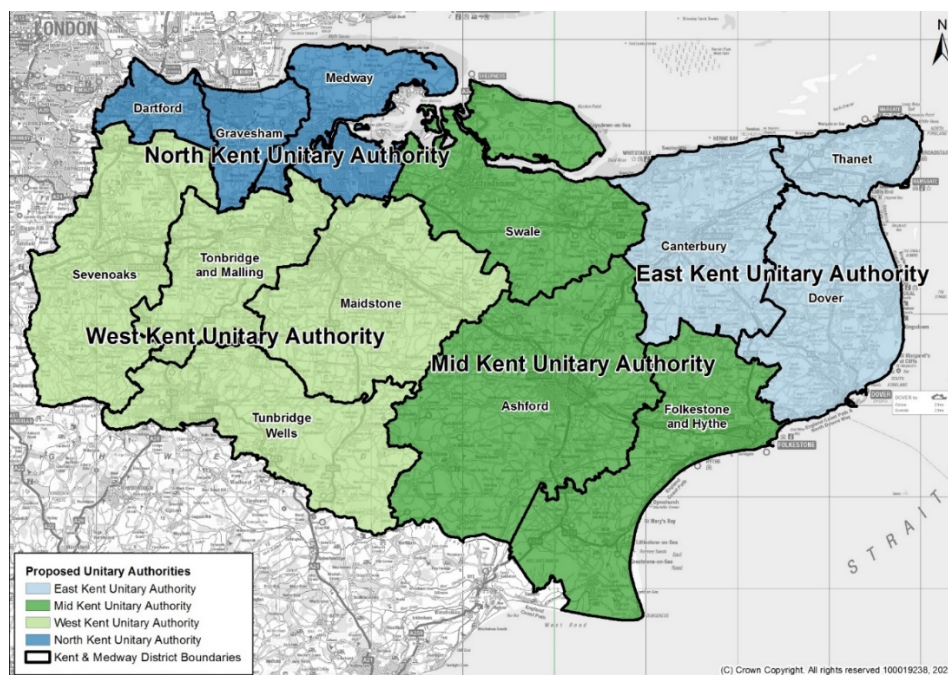
Manston Arrivals and Processing Centre from other border infrastructure, leading to a MSA having to work across multiple unitaries and also creates a small North Kent unitary which may be less engaged with Kent and more so with the Mayor of London.

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.

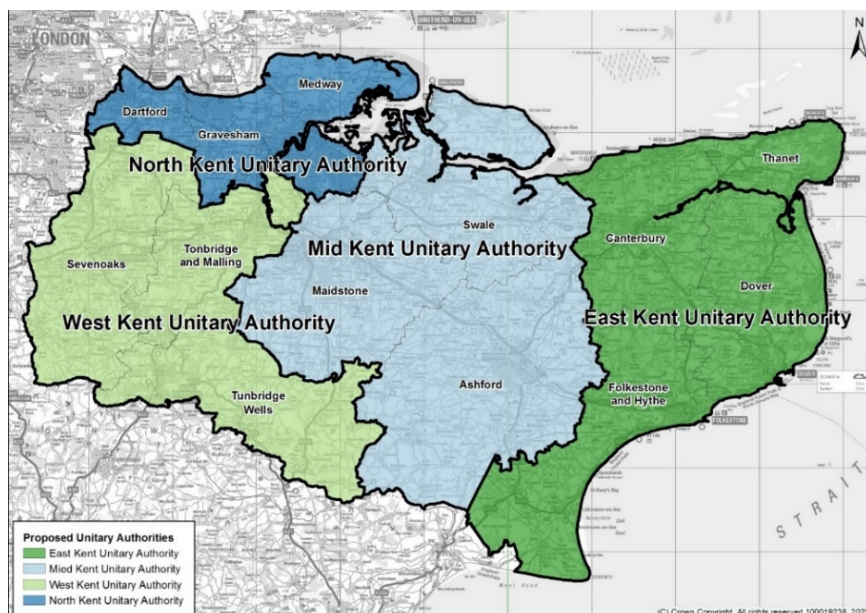
A Mayoral Strategic Authority could spend a disproportionate amount of effort in unitaries with higher need and deprivation and would have to work across multiple unitaries regarding coastal regeneration and border infrastructure, e.g. the Eurotunnel (Folkestone) and Sevington Inland Border Facility (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.

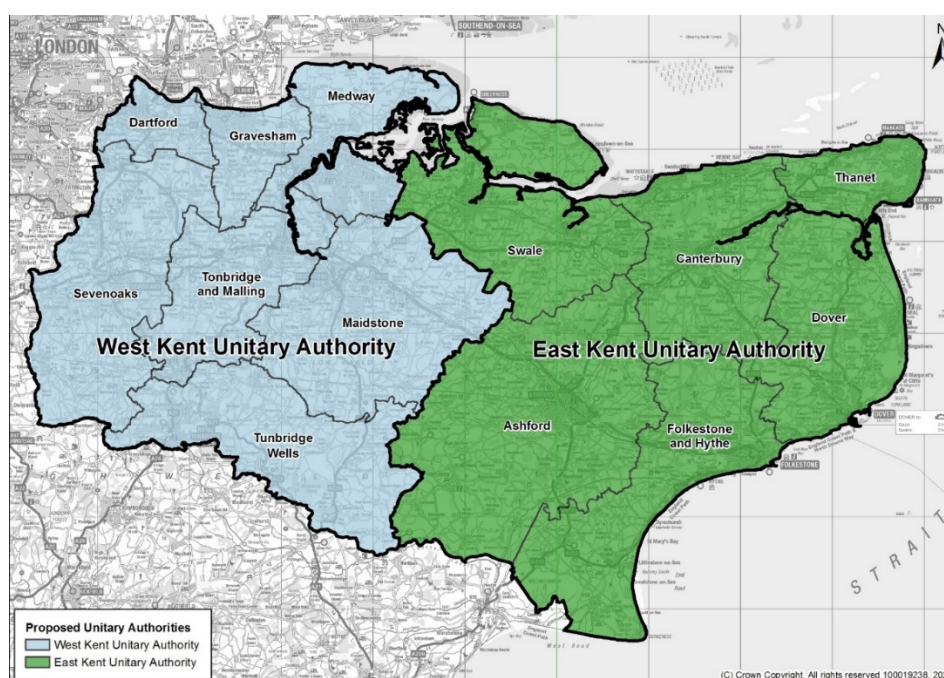
As with other four-unitary models, the proposed authorities could face challenges in maintaining the financial resilience and organisational capacity needed to deliver on MCA priorities. A Mayoral Strategic Authority would have to work across multiple unitaries regarding border infrastructure (e.g. Sevington 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.

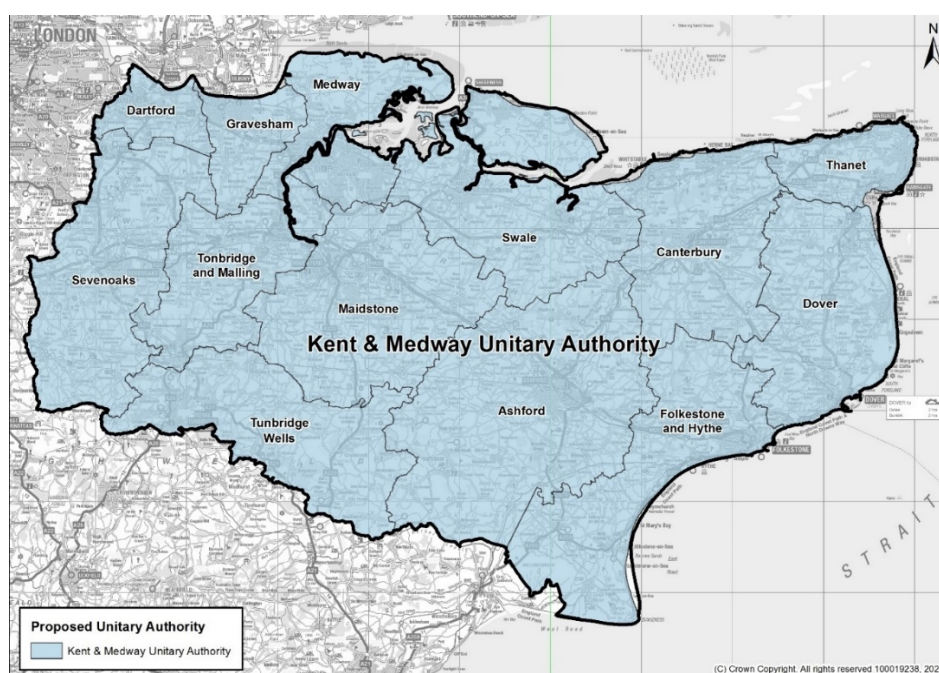
Governance between a Mayoral Strategic Authority and 2 unitary councils could be problematic in terms of decision-making, as there could be a dead-lock between the two councils on issues related to the whole county. Whilst this option may provide greater capacity and resources to manage border infrastructure 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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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>