

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

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

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

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

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

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

#### **A solution that works for the whole county**

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

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

#### **Maintains Kent and Medway as a functional economic area**

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

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

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

### **Maximises spatial planning and development at scale**

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

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

### **Our concerns with multi-unitary proposals**

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

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

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

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

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

Subcriteria:

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

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

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

### **Provides the financial strength to deliver outcomes**

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

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

### **Countywide scale, local delivery**

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

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

The creation of three Area Assemblies in North, East, and West Kent will ensure that the Kent Council remains closely connected to the communities it serves. Assemblies will be empowered to make decisions on how community services such as libraries, Family Hubs and highways maintenance are run, enabling a more tailored and responsive approach that reflects the distinct identities, needs, and priorities of local areas.

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

### **Builds on what works**

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

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

### **Our concerns with multi-unitary proposals**

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

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

Subcriteria:

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

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

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

Manage debt locally.

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

### **Financial sustainability is key**

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

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

The Kent Council would:

- Avoid the costs and risks of disaggregating key countywide services which could add up to £68 million per year in other options.
- Deliver the highest net recurring benefit of £69 million per year, cumulative £457 million after 10 years which is more than double the highest predicted cumulative saving for any of the multi-unitary options.
- Incur the lowest transition costs - £99 million compared to up to £139 million for other options.
- Deliver the fastest payback period - 3.3 years compared to up to 14 years (or potentially never) in other options.

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

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

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

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

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

The Kent Council would:

- Avoid concentrating unsustainable financial pressures on individual unitaries, particularly in East Kent. Spend per head on adult social care could vary by nearly £200 between individual unitaries, for example.
- Allow a single rate of council tax across the county and a wide tax base, evening out disparities in revenue raising potential.
- Assuming average harmonisation, most households in a single unitary would pay less council tax than if they were resident in one of the multi-unitary options.
- Avoid unitaries inheriting uneven distributions of legacy debt, which currently varies hugely from £0 to £2,134 per head in different parts of the county.

### **Our concerns with multi-unitary options**

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

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

3a – between £340 and £478

4b – between £560 and £791

4d – between £567 and £799

5a – between £787 and £1,111

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

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

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

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

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

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

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

Subcriteria:

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

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

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

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

#### **The scale and capacity to genuinely reform public service delivery**

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

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

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

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

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

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

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

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

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

### **Avoids fragmenting crucial services**

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

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

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

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

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

### **Our concerns with multi-unitary options**

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

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

Subcriteria:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Subcriteria:

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

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

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

### **Kent and Medway is devolution-ready**

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

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

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

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

### **Our concerns with multi-unitary options**

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

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

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

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

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

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

Subcriteria:

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

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

#### **Investment in engagement and empowerment with real purpose**

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

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

### **Engagement that fits real life**

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

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

### **Our concerns with multi-unitary options**

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

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

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

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

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

**Additional costs and disruption to implement boundary changes**

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

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

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

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

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

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