

Devon Association of Local Councils
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Cheriton Bishop
Devon
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18th March 2026

Ministry of Housing, Communities and Local Government
LGR Consultation
Fry Building 2NE
2 Marsham Street
London
SW1P 4DF

Dear Sir or Madam,

Devon Association of Local Councils' response to the consultation on proposals for local government reorganisation in Devon

Summary

We are responding in the certainty that, in our largely rural county, parish and town councils will be central to the success of unitarisation. This is reflected in the fact that 559,673 of Devon's electors live in parished areas served by a local council or parish meeting. We are therefore disappointed that parish and town councils, as the first tier of local government, are not statutory consultees. Given the diverse geographical spread of our 350 member councils across the county, each with their own priorities and perspectives, we urge that due consideration is given to their individual responses to the consultation since they are best placed to speak for their communities.

The Devon Association of Local Councils (DALC), alongside the National Association of Local Councils (NALC), cannot offer a collective view on behalf of all our member councils. We have focused our response on those areas where we can provide evidence grounded in feedback from our member councils, which has highlighted several key issues including:

- The need for fair arrangements for asset and service transfers
- Ensuring parish and town councils have a voice in neighbourhood governance structures
- Concerns about boundary changes and local identity
- The importance of strong partnership working with future unitary authorities
- Addressing the democratic gap in currently unparished areas

Transfer of services or assets to parish and town councils.

Our engagement with member councils consistently indicates this is one of the most significant topics for parishes and towns and one where they are looking for fair outcomes that will sustain their communities in the long term.

Many parish and town councils in Devon are willing to assume responsibility for local assets and services to secure ongoing provision for their residents; however, our sector cannot be regarded as a dumping ground for loss-making services or assets. Where assets or services may be withdrawn, parish and town councils must be consulted at the earliest opportunity so they have the time and opportunity to carry out adequate community engagement and do their due diligence to assess

financial viability. This will also provide a suitable timeframe to allow even-handed and co-operative negotiations to take place.

Parish and town councils can only raise a precept annually. Unlike principal authorities they do not receive a revenue support grant, a share of business rates or have access to government grant funds. Any devolution of assets or services will need appropriate and sustainable funding, perhaps through the Community Infrastructure Levy, or transfer packages negotiated on a cost-neutral basis. To assist with financial planning, and support partnership working with existing authorities and new unitaries, we support the call of the National Association of Local Councils for a multi-year exemption for parish and town councils from council tax referendum principles.

Our member councils are also concerned that assets may be offered at market value, and they will be unable to compete with private sector purchasers, leading to the loss of critical community facilities. Local councils are looking for a better partnership approach than this. Furthermore, we understand that the General Disposal Consent (England) 2003 provides a mechanism for negotiating on assets which generate income and will look to principal authorities to engage in good faith on these and all assets of importance to communities.

We note the proposal from Devon County Council addresses the transfer of assets or services to town and parish councils on a cost-neutral basis and to our knowledge, other proposals do not address this matter.

Community engagement and neighbourhood empowerment

We want to emphasise the essential work undertaken by parish and town councils across Devon, whose close connection to their communities ensures responsive and locally informed decision-making. These councils deliver essential services making them central to effective local functioning, which must be fully recognised by future local government arrangements.

We recognise Neighbourhood Area Committees as a model for place-based engagement and leadership which strengthen community participation, providing they do not dilute the role or autonomy of existing town and parish councils. Where Neighbourhood Area Committees are to be established, they must be empowered to make meaningful decisions for their communities, supported by the necessary budgetary resource. Our members are ready and willing to engage in local decision-making on planning matters, local grant giving, management of local areas, and more. Neighbourhood Area Committees will also require robust routes for engagement with the unitary authorities to facilitate meaningful work.

We support the recommendations of our national body, the National Association of Local Councils, for the Terms of Reference and Operational Framework for Neighbourhood Area Committees, which are laid out in their response to this consultation. In particular, we believe it is essential that parish and town councils have a voice and a vote on Neighbourhood Area Committees in recognition of their role as core strategic partners.

We note that the proposals from Devon County Council and from Exeter and Plymouth City Councils both include representation for parish and town councils on Neighbourhood Area Committees, which matches our members' desire to work in close cooperation with any new unitary. The two proposals from district councils in Devon do not provide local council representation on Neighbourhood Area Committees but propose instead a new tier of Local Community Networks that would include towns and parishes. We are aware that final arrangements may differ from what is outlined in the successful proposal, following amendments that may be made during

implementation. However, whatever form unitary reorganisation takes, we aim to work alongside the new lead authority(ies) to ensure that the voice of our sector in support of their communities is heard.

Changes to existing district council boundaries

The communities represented by our member councils possess strong and distinct local identities which may be adversely affected by alterations to existing boundaries. Our engagement with our member councils impacted by proposed boundary changes consistently indicates that many feel inadequately consulted or not consulted at all on changes they may well not envisage as the best future for their communities. This is a concern for us given the significant impact of some of the proposed boundary changes.

Where boundaries are revised to include rural parishes with an urban area, there may also be material implications for the delivery of local services. Rural parishes have unique needs and challenges; it is essential that any authority proposing to bring these areas within its jurisdiction is fully equipped to identify, understand and respond to those needs. A concern frequently mentioned by our member councils, particularly smaller communities, is that their voice will go unheard in unitary councils with large centres of population. This further reinforces the importance of adequate consultation on this matter as well as the need for effective Neighbourhood Area Committees that include parish and town council representatives.

We note that the proposal made by Devon County Council and one of the proposals from the district councils (proposed by South Hams DC, Teignbridge DC, and West Devon BC) do not require a boundary change.

Unparished areas in Devon

We believe that parish and town councils play a vital role in giving communities a voice. The establishment of new parish and town councils in currently unparished areas (such as Exeter, Plymouth, and parts of Torbay) should form an integral part of any reorganisation process.

This is of particular concern where parish councils exist alongside unparished areas within a unitary, causing a democratic deficit between those areas represented by a parish or town council and those areas which do not benefit from that level of local representation.

We are willing to support the creation of any new parish or town councils and are open to engaging with community organisations interested in pursuing this opportunity.

We note that the proposals submitted by the district councils indicate a willingness to work with DALC on this matter during implementation.

Implementation and structure

A key issue arising from our consultations with member councils is the need for strong, constructive relationships with principal authorities. We are keen to work with both new and existing authorities to build those relationships. As the new unitary authorities are formed, we request that the following proposals be adopted to enable genuine, productive partnership-working with parish and town councils across Devon:

- Representation for DALC on the Joint Implementation Team responsible for setting up any new unitary authorities.
- Regular monthly meetings between DALC, and unitary authority leaders.

- Regular meetings between parish and town council representatives and unitary authority leaders.
- Dedicated parish and town council liaison teams within each unitary authority, supported by appropriate training on the role and function of local councils. DALC is willing to provide this training and can work with liaison teams to ensure their effectiveness.
- A charter clearly defining the working relationship between the unitary authorities and their parish and town councils. DALC is willing to provide support with this work to ensure that any charter reflects the views of our member councils.
- Training and development support for the local council sector to strengthen understanding of unitary authority functions and to promote effective engagement.

These suggestions reflect learning from other counties, as well as our own experiences and feedback from our members, on the kind of engagement that is critical to ensuring good outcomes for town and parish councils as well as building a successful partnership between our sector and unitary authorities to deliver for Devon.

Whichever proposal is selected, we look forward to working with all partners to help achieve the best possible future for communities across Devon.

Yours faithfully,



Rebecca Walker
Chief Executive Officer
Devon Association of Local Councils

Signed on behalf of The Devon Association of Local Councils Board of Directors:

- **Chair of DALC, Cllr Liz Brookes-Hocking, Crediton Town Council**
- **Vice-chair of DALC, Cllr Mike Joyce, Newton Abbot Town Council**
- **Cllr Colin Trudgeon, Bishops Clyst Parish Council**
- **Cllr Colin Slade, Halberton Parish Council**
- **Cllr Ian Cowling, Bishops Nympton Parish Council**
- **Cllr Paul Hayward, Axminster Town Council (clerk), East Devon District Council, and Devon County Council**
- **Cllr Pauline Odulinski, Winkleigh Parish Council**
- **Cllr Ruth Pearson-Bunt, Plasterdown Grouped Parish Council**