

6 March 2026

PRX-XX | PROPOSALS FOR LOCAL GOVERNMENT REORGANISATION IN DEVON, PLYMOUTH AND TORBAY

Introduction

This statutory consultation sought views on the proposals that the Ministry of Housing, Communities and Local Government (MHCLG) has received following the Secretary of State's invitation to councils in Devon, Plymouth and Torbay to submit proposals for unitary local government for their areas.

Key messages

- England's 10,000 parish and town councils play a vital role in providing essential hyperlocal public services, giving a vital democratic voice to local communities, and are deeply rooted in these communities and best placed to advocate for them.
- Effective devolution and local government reorganisation must recognise the role of parish and town councils as the community tier of local government. They can be a strong voice for our local neighbourhoods and help address fears of remote government resulting from the establishment of new strategic and unitary authorities. By strengthening their role and expanding their coverage, the government can ensure that devolution does not stop at regional or subregional level and delivers tangible benefits for communities nationwide.
- Local government reorganisation will be worthwhile if it achieves new unitary authorities of sufficient size, scale and footprint to enable parish councils to be empowered and take on a bigger role where they have the will and the capacity, and for new parish and town councils to be established where they do not currently exist.
- Parish and town councils and county associations of local councils have a powerful and important voice which should be listened to from the very beginning of a process to create new unitary authorities. County associations of local councils should be appropriately equipped to contribute to the reorganisation process, along with adequate resourcing and support for parish and town councils to ensure the process has sound long and short-term benefits.
- Consideration should be given to mechanisms to enable effective partnership and collaboration, including county association membership of the Joint Implementation Team establishing any new unitary authority, the development of a charter, dedicated parish council liaison officer, establishment of a focus group, monthly engagement with the county association, provision of training support, and county association representation on new unitary authority.
- To ensure Neighbourhood Area Committees meet the ambition set out by the government, consideration should also be given to mechanisms to enable effective implementation and collaboration. These include minimum meeting frequency, governance responsibility, councillor allocation method, decision-making protocols, chair and vice chair elections, communication, consultation and training.

Consultation response

The National Association of Local Councils (NALC) represents 10,000 parish and town councils across England, working in collaboration with county associations to support, promote and improve communities. Our members represent 35 million people with 16 million electors, raising £800 million in precept and investing over £2 billion in communities.

Parish and town councils play a vital role in providing essential hyperlocal public services, giving a vital democratic voice to local communities. Indeed, our councils are deeply rooted in these communities and best placed to advocate for them.

NALC initially welcomed the publication of the English Devolution White Paper. This has the potential to provide a generational opportunity to push power out of Whitehall into village and town halls, rewire local government relationships to simplify the system, improve public services and bring greater democracy to every corner of the country.

However effective devolution and local government reorganisation must recognise the role of parish and town councils as the community tier of local government. They can be a strong voice for our local neighbourhoods and help address fears of remote government resulting from the establishment of new strategic and unitary authorities. By strengthening their role and expanding their coverage, the government can ensure that devolution does not stop at regional or subregional level and delivers tangible benefits for communities nationwide.

NALC was pleased that the white paper sets out the government's position and commitment to "work with the town and parish council sector to improve engagement between them and local authorities" and supporting stronger community engagement" and to "rewire the relationship between town and parish councils and principal local authorities, strengthening expectations on engagement and community voice".

NALC has also welcomed statements made by ministers, including in Parliament, which further underscore the government's recognition and support for parish and town councils:

- *"At a neighbourhood level, we see town and parish councils playing a critical role in devolution"*
- *"This Government absolutely values the crucial role played by town and parish councils in local government. We know people value the role of governance at the community scale. We want to see stronger community arrangements when reorganisation happens in the way councils engage at a neighbourhood or area level"*
- *"As we continue to develop our longer-term strategy for communities, I am firmly committed to working together, and with the wider parish sector so that our approach is informed by those who understand the diverse and complex challenges that our communities face. I look forward to our continued collaboration as we take forward this important work".*
- *"We genuinely do continue to value the role of town and parish councils in moving forward. All the priorities that I know are so close to the hearts of all those who take part in parish and town councils. And I know how effective you are delivering local services. I've seen it over*

many years of engagement, and we want to make sure that there's a simplified, standard system of local area working, but that to strengthen the ability of local authorities to work with and engage with communities, really genuinely complementing the work of town and parish councils where they exist"

NALC is committed to working positively and constructively with the new government to deliver its missions and to build stronger, more resilient communities. Because our country faces challenges that national government alone cannot solve. And indeed, national government cannot deliver its missions on its own. It is local government at all levels which is the key to tackling these challenges.

This includes our most local level of government, parish and town councils who are local leaders with 'skin in the game', who know their places best and what they need. Local leaders who are taking action on issues such as climate change, cost of living, health and well-being, high streets and town centres, community safety, and services for younger and older people – just some of the profound issues we face, which hyperlocal parish and town councils are stepping up to address.

As the representative body for parish and town councils, NALC is actively working with and supporting our members and county associations to respond to and support the devolution agenda. In the same spirit we will be working constructively with the government and parliamentarians on the English Devolution and Community Empowerment Bill now it is proceeding through Parliament.

We therefore welcome the opportunity to comment on proposals for the creation of unitary authorities in Devon, Plymouth and Torbay.

Our comments primarily focus on the prospects for parish and town councils in any unitary authority outcome. In general, these reorganisations will be worthwhile if they achieve new unitary authorities of sufficient size, scale and footprint to enable parish councils to be empowered and take on a bigger role where they have the will and the capacity, and for new parish and town councils to be established where they do not currently exist.

We also acknowledge any response from the Devon Association of Local Councils and the important point that given the diverse geographical spread of our member parish and town councils across the counties, each with unique local priorities and perspectives, due consideration should be given to any individual responses to the consultation. NALC and the Devon Association of Local Councils are not able to offer a collective view on their behalf for these questions.

We have focused our response on those parts of the consultation which we feel we can respond collectively for our members, accordingly our comments are set out below:

- From the experience of local government reorganisations over the past 10-15 years elsewhere in England, we advocate that the following good practice is adopted, in relation to the part which local councils can usefully contribute to the design and implementation of any new unitary principal authority arrangements.
- Parish and town councils and county associations of local councils have a very powerful voice which should be listened to from the very beginning of a process to create new unitary

authorities. It is important that county associations of local councils are appropriately equipped to contribute to the reorganisation process. Collaboration, communication and cooperation are vital. Adequate resourcing for all parish and town council bodies involved in a unitarisation process can only have sound long and short-term benefits.

- The relevant county association of local councils must be involved as a full member of the Joint Implementation Team establishing any new unitary authority.
- New parish and town councils must be established in unparished areas as part of the reorganisation process, and any current Charter Trustees abolished. This must be part of the design of the new unitary authority(ies) and the process should start at the earliest opportunity and not be left until after the new unitary authority(ies) are established. The government must strongly encourage this. After the government has made the decision to formally create a new unitary authority, where there is local disagreement over whether and where new parish and town councils should be created (and where mediation is needed), such cases must be referred to MHCLG for determination and resolution.
- One task of the Joint Implementation Team must be to develop and ensure adoption of a charter which sets out the roles, respective responsibilities and relationships between the unitary authority and the parish and town council sector, including matters concerned with resources and assets such as property. It is important that this charter must take account of the varying size, capacity and ambition within parish and town councils, including the prospective circumstances of any new parish and town councils which are due to be created.
- Where policies and practices are being harmonised across a new unitary authority area, there must be a levelling-up of relations by parish and town councils with new unitary authorities; these relations must not be less productive, positive or harmonious than enjoyed previously.
- It is critical that parish and town councils are consulted at the earliest opportunity when assets and services may be withdrawn, to enable meaningful devolution to the localist level. Timely engagement ensures that community views can be properly considered, a financially sustainable and operationally robust framework can be developed, and affected councils are given the opportunity to negotiate taking on any assets, services or responsibilities where there is demonstrated need and sufficient means.
- Parish and town councils are only able to raise a precept (their small share of council tax and primary source of income) annually and must demonstrate both financial viability and adequate consultation if they are to take on devolved assets and/or services. Unlike principal authorities, parish and town councils do not receive revenue support grant, a share of business rates or have access to government grant funds. Any proposed devolution must be accompanied by appropriate funding support—such as through Community Infrastructure Levy (CIL)—to help local communities thrive, particularly in the rural parts of the county.
- We strongly support the need for a key role played by the Local Government Boundary Commission for England in providing a critical dispassionate view during the reorganisation

process that reflects an agreed set of criteria such as size, resources, democratic accountability and local support.

- County associations of local councils can have a beneficial role in nurturing and supporting the creation of any new parish and town council, including the provision of temporary clerking or support with recruitment.
- We think that the successful proposal must be the one which most clearly outlines how new unitary authorities will collaborate meaningfully with parish and town councils to support a successful rewiring of the relationship between central and local government and with principal authorities and town and parish councils. Without clear mechanisms for neighbourhood-level engagement, the risk is that genuine local empowerment may remain aspirational.
- We would urge consideration be given factors regarding structural recommendations to enable effective collaboration, including:
 - Charter between parish and town councils and the newly formed unitary(ies) to establish clear rights and responsibilities, mutual expectations, procedures and ways of working. A charter will help avoid duplication and ensure efficiency of service delivery, be reviewing regularly and be binding.
 - Town and parish deals, including a devolution framework that sets out how parish and town councils and newly formed unitary authorities (ies) work together. The framework should cover service delivery; partnership working; devolved funding; governance and asset transfers. The framework will be reviewed regularly, be binding and will help avoid duplication and ensure efficient service delivery. Local deals, which are reviewed annually, will sit alongside the framework and set out the specific devolved responsibilities for each parish and town council.
 - Dedicated devolution team within the new unitarity authorities with responsibility for supporting double devolution.
 - Devolution board, with representation from the unitary authority, Devon Association of Local Councils, and town and parish councils and provides an opportunity for new double devolution proposals to be considered and best practice shared.
 - Parish Council Lead Liaison Officer who is trained on the role of parish and town councils within the county(ies). The learnings from other existing unitary authorities is that this role is critical, particularly in the early days.
 - Dedicated portfolio holder responsible for supporting double devolution.
 - Create a Parish and Town Council and Unitary Lead Focus Group. Establish a group of sample parish and town councils to develop better ways of working and improvement ideas whether that be communication, highways, disaster response etc. This would be a permanent group set up for to facilitate improvements and consistency in ways of working between each new Unitary and their parish and town councils. Such roles would

be rotated amongst parish and town councils over time, to ensure engagement across all parish and town councils.

- Devolution networks that allow clusters of town and parish councils to meet regularly with the unitary authority and provide feedback on local issues and agree actions.
 - Devolution leadership meetings between the Devon Association of Local Councils and unitary leaders monthly to discuss key issues and opportunities.
 - Monthly meetings with Devon Association of Local Councils, representatives of nominated lead parish and town councils for the county and new unitary authority leaders.
 - Training support for the sector to include courses on how to collaborate with the new unitary authority and process for transfer of services or assets.
 - Further to ongoing exploratory discussions with existing unitary authorities, Devon Association of Local Councils to have representation on the unitary authority executive committee and the Standards Board. Such inclusion would enable stronger, more consistent engagement with parish and town councils. In particular, Devon Association of Local Councils could support Monitoring Officers by identifying appropriate training resources and recommending mediation pathways for unresolved standards concerns, reinforcing sector transparency and the new unitary authority's commitment to high standards.
- Early insights from other county pilot Neighbourhood Area Committee (NAC) areas suggest that NACs may lack the necessary democratic mandate and operational clarity to deliver truly local representation and impact.
 - To ensure NACs meet the ambition set out by the government, consideration should be given to any Devon Association of Local Councils views regarding structural recommendations to enable effective collaboration.
 - Recommendations for their Terms of Reference and Operational Framework could include:
 - Minimum Meeting Frequency: Define a minimum number of meetings per year to ensure meaningful engagement. We suggest NACs should meet at least every two months, be hybrid in form and open to the public.
 - Governance Responsibility: Clarify the officer/team responsible for managing quorum, collating items for Committee agendas including those from NAC members, recording and transparent publishing of decisions, financial monitoring, and performance tracking. Define frequency of performance review, by whom & follow up procedures for an underperforming NAC.
 - Councillor Allocation Method: In the interest of fairness and efficiency, each parish and town council appoints a NAC member representative. Given the democratic mandate and local accountability of parish and town councillors, this approach would ensure that each community retains a clear and independent voice. Consideration should be given to

appointed representatives not being both a member of Devon County, Plymouth, Torbay and any district, borough, town or parish council, to reinforce impartiality and avoid perceived conflicts of interest during any pilot phases of NACs.

- Decision-Making Protocols: Establish transparent voting procedures and governance safeguards.
 - Committee Oversight: Define how population coverage, boundaries, and membership will be reviewed over time.
 - Chair and Vice Chair Elections: NAC to appoint. The Terms of Reference needs to clearly set out the process, eligibility (including both Unitary and parish and town councillors), and term limits, ensuring equal voice and shared leadership. The unitary authority and a representative parish and town councillor could each hold a post to ensure a partnership approach.
 - Communication with parish and town councils: Mandate reporting to all parish and town councils within each NAC's boundary not just unitary councils.
 - Training Commitment: Provide induction and ongoing training on NAC roles and responsibilities to its members.
 - Evidence Integration: Ensure a formal process for considering community consultation data from parish and town councils within NAC deliberations.
 - Funding Allocation Framework: Clarify how NACs will be funded, allocation of that funding and also allow for pooled resources for shared community priorities.
 - Disbandment Procedures: Include a member-led process to protect democratic accountability.
 - Pilot NAC Workshop Engagement: Each parish and town council within a NAC area to nominate both its proper officer and one councillor representative to participate in workshops. This dual representation ensures a well-rounded perspective, drawing on both procedural knowledge and elected member insight.
 - NAC Unitary Link Officer: Must have sufficient respect and power within the new unitary councils so to effectively mobilise unitary staff to support the delivery of the NAC's agreed objectives.
 - Consultation: A formal consultation should be undertaken with all parish and town councils across the county regarding the proposed NAC Terms of Reference, core principles, and operational framework. Sector-wide engagement will be essential to building trust and ensuring long-term success
- The government should offer greater clarity and intent in its approach to stakeholder engagement regarding local government reorganisation and proposals by principal authorities. The successful proposal should be the one which best harnesses the robust partnership mechanisms listed above.

- Given that the Devon Association of Local Councils is the representative bodies for parish and town councils in Devon, Plymouth and Torbay, which are those institutions closest to local people and communities, NALC expects there to be a stronger commitment to bottom-up engagement. Genuine neighbourhood involvement cannot be achieved without harnessing the expertise and insight of those already embedded in local governance.

Should you require any further information on this response please do not hesitate to contact Justin Griggs, head of policy and communications, via email at justin.griggs@nalc.gov.uk . © NALC 2026