



# MODBURY PARISH COUNCIL

**Parish Office:** 32 Church Street, Modbury PL21 0QR  
**Tel:** 07467 134 225  
**Email:** [parishclerk@modburyparishcouncil.gov.uk](mailto:parishclerk@modburyparishcouncil.gov.uk)  
**Chair:** Councillor Barbara Price  
**Clerk:** Bleddyn Griffith

**Date:** 26<sup>th</sup> March 2026

## **Modbury Parish Council response to**

### **Proposals for local government reorganisation in Devon, Plymouth and Torbay**

Modbury Parish Council are submitting the following written response to suggested options to Unitary devolution in Devon. In participating in this consultation we note that Parish Councils were not considered one of the statutory consultees in this process which is disappointing considering that Parish/Town Councils are part of local government and are often considered key to undertaking services and projects in the local area. Parish/Town Councils are already being viewed as key partners in some of the options laid out in this consultation. In participating in this process we trust that our views will be taken on board and that some weight will be added to them.

The submissions provide a range of options, each with distinct advantages and challenges. The primary models considered are: a single county-wide unitary authority, multiple unitary authorities based on existing district boundaries, and a hybrid approach combining elements of both. These options have been debated in terms of efficiency, local accountability, and service delivery.

The single county-wide unitary authority model promises streamlined governance, potentially reducing duplication and achieving economies of scale. Proponents argue that this approach could enhance strategic planning, simplify administrative structures, and improve fiscal management. However, critics contend that it risks diminishing local representation, as smaller communities may feel their specific needs are overlooked in a larger bureaucratic entity.

We do feel that the creation of multiple unitary authorities—perhaps based on the current district councils—offers greater localism and responsiveness. This model could allow for tailored services reflecting the distinct identities and priorities of Devon's diverse communities. Yet, the risk of fragmentation remains, with possible inefficiencies arising from duplicated functions and increased inter-authority coordination requirements. Financial sustainability may also be a concern, as smaller units might struggle to deliver complex services cost-effectively.

The hybrid approach attempts to balance these considerations, perhaps by establishing a county-wide authority for strategic services (such as transport and economic development) alongside district-level bodies responsible for more localised functions. While this could foster both efficiency and localism, it may introduce complexity in governance arrangements, with potential confusion over responsibilities and accountability.



# MODBURY PARISH COUNCIL

Ultimately, the choice of unitary devolution model for Devon hinges on the values prioritised: whether efficiency and strategic oversight are deemed paramount, or whether local representation and responsiveness take precedence. The critical challenge is to design a system that delivers high-quality public services while reflecting the county's unique social and geographic diversity.

As a Parish Council we would not support the county-wide unitary authority model and we have set out our reasoning below. We endorse adopting a more localised strategy and concur with dividing Devon geographically into North and South regions. The geographical inclusion of various towns or parishes in individual proposals has sparked considerable debate, and there is no clear consensus on the matter. The summary of differing views on unitary council proposals for Devon highlights several points of contention and concern. There is a belief that Plymouth, even with its current population below the notional threshold, could remain a credible entity without annexing rural parishes, as this would be perceived as a move for income and housing rather than genuine concern for residents. Torbay, however, is seen as too small to stand alone, while the rest of Devon is considered too large and diverse to be effectively managed as a single unitary authority.

Proponents of a single unitary council argue chiefly for a cohesive transport plan, vital for Devon's economy and climate change objectives, though doubts persist about fiscal efficiency and local representation in such a large and varied county. This model is thought to suit urban areas more than rural ones.

The proposal for four unitary councils lacks clear justification, appearing mainly to augment Exeter and Plymouth's populations. Concerns are raised about splitting Teignbridge and Mid Devon parishes, which may lead to underrepresentation and fail to address deprivation effectively. The Devon Coast and Countryside option is criticised for creating a fragmented collection of communities, with no compelling vision or evidence of improved service delivery.

The three-unitary proposal, especially the 5-4-1 split, is favoured for its geographical logic, though balancing affluence and deprivation remains a challenge. There are questions about the mechanism for management and whether Neighbourhood Area Committees would be effective or merely symbolic. More evidence is sought for the inclusion of South Hams parishes in Plymouth, ensuring governance and service delivery benefits.

Across all options, concerns persist about the physical location of services, the possible sidelining of Parish Councils, and the need for robust local representation.

There is agreement within the Council that out of all the options the only ones that have any merit are:

1. The South Hams District Council, Teignbridge District Council, West Devon Borough Council proposed 3 unitary councils. (5-4-1 proposal) or
2. The alternate East Devon Borough Council, Mid Devon District Council, North Devon Council, Torridge District Council proposed 3 unitary councils which includes the request to split existing district council areas between the proposed new councils

The geographical split in the second option is not completely supported overall and it is felt that more information on the economical benefits to the parishes for this split should have been included in the proposal.



# MODBURY PARISH COUNCIL

It is agreed that the 5-4-1 proposal would be enhanced if it included a geographical split of Sherford and Woolwell as in our opinion it is very difficult to argue that these two areas should be governed from Torbay when they are economically supportive of, and reliant on, Plymouth. However we would reiterate that with out the additional information we have requested we cannot support any particular option.

## **Current proposals on which we are asked to comment and specific issues:**

**Devon County Council proposed 3 unitary councils. These would comprise the current areas of:**

- **Devon Unitary Council:** East Devon, Exeter, Mid Devon, North Devon, South Hams, Teignbridge, Torridge and West Devon (842K)
- **Plymouth** to remain unchanged (265K)
- **Torbay** to remain unchanged (139K)

## **Points to note**

The proposed changes to the governance structure in Devon represent minimal fundamental alterations to the area currently managed by Devon County Council. The most significant modification is the removal of District Councils, which presently oversee the delivery of certain services. This reform aims to establish a single point of access, consolidating all services under the responsibility of the new Unitary Council. By encompassing the entirety of Devon, all geographic and economic areas would be included; however, historical evidence suggests that this approach has sometimes resulted in economic pressures, leading to reduced service provision and budgetary overspends.

Furthermore this proposal leaves two unitaries well below the target of 500K population and one significantly above. Torbay is already struggling with an unsustainably small population base and a unitary Devon would struggle to meet the test of being able to deliver local services in the geographically second largest county in England. This is despite their proposals for NACs which lack credibility and true accountability. There is also no acknowledgement of the expansion of Plymouth into the current South Hams - the new communities in Sherford and Woolwell are both economically linked with and look towards Plymouth and should be incorporated in expanded boundaries.

As stated under the new proposal, the Devon Unitary Council would introduce Neighbourhood Area Committees (NACs). It is envisaged that 16 NACs would be formed, each comprising 5 to 8 elected members representing up to 50,000 residents. Three of these committees would be based in Exeter. Initially, the NACs would serve in an advisory capacity, but over time they are expected to be granted devolved budgets and responsibilities, supported by dedicated leadership teams. The elected members serving on these committees would be the Unitary Councillors for their respective NAC areas.

The NACs would be tasked with promoting collaboration with Parish and Town Councillors, engaging with community groups, and working in partnership with organisations including Health and Social Care. Parish and Town Councils would retain direct relationships with both the Unitary Authority and partnership groups, ensuring continued local representation and effective joint working. Future plans also include the potential to devolve assets and services to the Town and Parish Council level.



# MODBURY PARISH COUNCIL

Nevertheless, certain concerns have been raised regarding the proposals. The broad membership of the NACs may lead to questions about their effectiveness, with particular apprehension that they could become mere discussion forums for partners, leaving Officers and Elected Members holding the balance of power. Should Parish and Town Councils or partners choose to withdraw from the system, there is a risk that meaningful community engagement may be lost, and residents' views may not be adequately reflected in service provision.

Additionally, there is currently no clear timescale for when NACs would acquire devolved budgets and responsibilities. A change in political leadership within the Unitary Council might risk these plans remaining advisory, which could undermine the fundamental principles of the proposal and jeopardise the efficiency of service delivery. Conversely, if the Unitary Council continues to provide services across Devon without developing NACs locally, this could lead to increased administrative costs and a reduction in service efficiency.

While the proposal suggests the future devolution of assets and services to Parish and Town Councils, past experience indicates that assets have not always accompanied service transfers. It is essential that any such transfer be cost neutral, and guarantees to this effect should be sought.

Overall, there is a concern that this proposal may simply rebrand existing arrangements without delivering substantive improvements and for those reasons we do not feel as a Parish Council that we can support this option.

**South Hams District Council, Teignbridge District Council, West Devon Borough Council proposed 3 unitary councils. (5-4-1 proposal) These would comprise the current areas of:**

- Exeter and Northern Devon Unitary: East Devon, Exeter, Mid Devon, North Devon and Torridge (552K)
- Plymouth to remain unchanged (265K)
- Torbay and Southern Devon Unitary: South Hams, Teignbridge, Torbay and West Devon (429K)

**Points to note:**

From a geographical perspective, the proposed restructuring is logical. Essentially, it divides Devon into North and South regions, with Plymouth remaining unchanged. These boundaries closely reflect the existing health and social care provision, which should facilitate clearer decision-making processes. Adopting a more localised approach has its merits; however, significant disparities in need, alongside varying economic profiles across Devon, raise concerns about potential imbalances in service provision—particularly if areas of affluence and areas of critical need are managed separately.

The proposal lacks sufficient detail regarding how its extensive and ambitious objectives will be realised. While several examples were provided illustrating successful collaboration between councils at a local level, it remains uncertain whether such cooperation can be scaled effectively, especially when addressing economic responsibilities that were previously managed by another authority.



# MODBURY PARISH COUNCIL

Furthermore, the proposal mentions the establishment of Neighbourhood Area Committees and Local Community Networks as foundational elements. Yet, there is little clarity on their structure, operation, or the practical implications for communities. Building trust is essential for fostering genuine collaboration between residents, partners, and the Council. If the mechanisms for engagement amount to little more than discussion forums, or if residents and partners feel their input is disregarded, meaningful participation is unlikely to follow.

Whilst overall this is a much better solution which provides a more balanced distribution of populations it still does not address the issue of the new communities on the fringes of Plymouth. It is very difficult to argue that Sherford and Woolwell should be governed from Torbay when they are economically supportive of, and reliant on, Plymouth. It also leaves Plymouth with in our view an unsupportable economically situation in the long term due to its population size.

**East Devon Borough Council, Mid Devon District Council, North Devon Council, Torridge District Council proposed 3 unitary councils. This includes a request to split existing district council areas between the proposed new councils. These would comprise the current areas of:**

- **Exeter and Northern Devon Unitary:** East Devon, Exeter, Mid Devon, North Devon, and Torridge (552K)
- **Plymouth Expanded:** Plymouth plus parts of the parishes of Bickleigh, Brixton, Shaugh Prior and Sparkwell from the neighbouring district of South Hams (approx 275K)
- **Torbay and Southern Devon Unitary:** Remaining parts of South Hams, Teignbridge, Torbay and West Devon (approx 419K)

## Points to note

This is essentially the same proposal as the previous one (5-4-1) with the addition of a proposal to split South Hams District.

The debate surrounding the proposed boundary adjustments, particularly the split of South Hams District, reveals two distinct perspectives. On one hand, there is a well-documented and consistent opposition from residents and local parish councils, who argue that such changes lack compelling economic justification and risk undermining established community ties, local representation, and service delivery. Their position emphasises the importance of maintaining community cohesion and warns against making significant alterations for the benefit of a limited number of councillors, especially when broader advantages have not been demonstrated.

Conversely, the counterpoint asserts that boundary changes are necessary to reflect the realities of communities closely linked to Plymouth. Proponents argue that it is illogical for areas that rely on and contribute to Plymouth's economy and services to be governed externally, such as from Torbay. They contend that incorporating these communities into an expanded Plymouth unitary would enhance governance and better align with population targets. While opposition from affected communities is acknowledged, this viewpoint suggests that such resistance overlooks the mutual benefits of shared governance and the need for equitable representation within the city's administrative framework.



# MODBURY PARISH COUNCIL

Ultimately, the discussion centres on balancing the desire for local autonomy and identity with the practical considerations of effective governance and resource allocation. Both positions raise valid concerns: the first prioritises community sentiment and administrative stability, while the second highlights the importance of aligning governance structures with functional relationships and demographic realities. A thorough and transparent evaluation of the evidence and the long-term implications for all stakeholders is essential before any decision is made.

**Exeter City Council and Plymouth City Council proposed 4 unitary councils. This includes a request to split existing district council areas between the proposed new councils. These would comprise the current areas of:**

- **Devon Coast and Countryside:** The rest of Devon (approx 408)
- **Exeter:** Exeter plus 15 parishes from within Teignbridge District Council, 28 parishes from within East Devon District Council and 6 parishes from within Mid-Devon District Council. (approx 255K)
- **Plymouth:** Plymouth plus 13 parishes from South Hams (approx 290K)
- **Torbay:** Torbay plus 22 parishes from within Teignbridge District Council and South Hams District Council. (approx 301K)

## **Points to note:**

Upon reviewing these proposals, there appears to be no compelling economic justification for splitting the districts as suggested. Throughout multiple consultation processes, residents and Parish/Town Councils have consistently communicated clear opposition to such changes, underscoring a strong local consensus against the proposal. The only discernible advantage would be to the cities of Torbay, Exeter, and Plymouth, as the boundary adjustment would provide them with a sufficient population to appoint Unitary Councillors. However, this benefit is narrowly focused and does not address broader community interests or needs.

Furthermore, boundary changes of this nature have the potential to disrupt established community ties, diminish local representation, and create administrative challenges, all of which could negatively impact service delivery and community cohesion. Without robust evidence of economic, social, or administrative benefits, it is difficult to justify proceeding with these changes solely for the benefit of a limited number of councillors. In light of these considerations, the proposal lacks sufficient merit, particularly given that the addition of another unitary means none of the new unitarises would approach the target of a 500,000 population.

Nonetheless, the proposals do address the issue of local economies and travel-to-work areas, and it is difficult to argue against the idea of the three main urban areas having control over their hinterlands. These proposals support the city-region approach, which failed to gain sufficient traction during the 1974 reorganisation. However, this arrangement leaves a rural unitary straddling the peninsula from north to south, which appears somewhat like an afterthought.



# MODBURY PARISH COUNCIL

**Torbay Council proposed 4 unitary councils. This includes a request to split existing district council areas between the proposed new councils. These would comprise the current areas of:**

- **Exeter Council:** Exeter plus 15 parishes from within Teignbridge District Council, 28 parishes from within East Devon District Council and 6 parishes from within Mid Devon District Council (appro 255K)
- **Plymouth Council:** Plymouth plus 13 parishes from South Hams (approx 290K)
- **Rural Devon Coast and Countryside Council:** The rest of Devon (approx 570K)
- **Torbay Council** to remain unchanged (139K)

## **Points to note**

Upon review of these proposals, there appears to be no compelling economic justification for splitting the districts as suggested. Throughout multiple consultation processes, residents and Parish/Town Councils have consistently communicated clear opposition to such changes, underscoring a strong local consensus against the proposal. The only discernible advantage would be to Exeter and Plymouth, as the boundary adjustment would provide them with a sufficient population to appoint Unitary Councillors. However, this benefit is narrowly focused and does not address broader community interests or needs.

Furthermore, boundary changes of this nature have the potential to disrupt established community ties, diminish local representation, and create administrative challenges, all of which could negatively impact service delivery and community cohesion. Without robust evidence of economic, social, or administrative benefits, it is difficult to justify proceeding with these changes solely for the benefit of a limited number of councillors. In light of these considerations, the proposal lacks sufficient merit.

This proposal has Torbay remaining at an unsustainably low population level as well as creating a rump Devon rural unitary

Cllr B Price  
Chair  
Modbury Parish Council