Public Document Pack

TONBRIDGE & MALLING BOROUGH COUNCIL

EXECUTIVE SERVICES

Chief Executive
Damian Roberts

Gibson Building
Gibson Drive
Kings Hill, West Malling
Kent ME19 4LZ
West Malling (01732) 844522

NB - This agenda contains proposals, recommendations and options. These do not represent Council policy or decisions until they have received proper consideration through the full decision making process.

Contact: Democratic Services
committee.services@tmbc.gov.uk

5 November 2025

To: MEMBERS OF THE OVERVIEW AND SCRUTINY COMMITTEE
(Copies to all Members of the Council)

Dear Sir/Madam

Your attendance is requested at a meeting of the Overview and Scrutiny Committee to be held in the Council Chamber, Gibson Drive, Kings Hill on Thursday, 13th November, 2025 commencing at 7.30 pm.

Members of the Committee are required to attend in person. Other Members may attend in person or participate online via MS Teams.

Information on how to observe the meeting will be published on the Council's website.

Yours faithfully

DAMIAN ROBERTS

Chief Executive

A G E N D A

1. Guidance on the Conduct of Meetings 5 - 8

PART 1 - PUBLIC

2. Apologies for absence

3.	Notification of Substitute Members	9 - 10
4.	Declarations of interest	11 - 12

Members are reminded of their obligation under the Council's Code of Conduct to disclose any Disclosable Pecuniary Interests and Other Significant Interests in any matter(s) to be considered or being considered at the meeting. These are explained in the Code of Conduct on the Council's website at [Code of conduct for members – Tonbridge and Malling Borough Council (tmbc.gov.uk)].

Members in any doubt about such declarations are advised to contact Legal or Democratic Services in advance of the meeting.

5.	Minutes	13 - 20

To confirm as a correct record the Minutes of the meeting of the Overview and Scrutiny Committee held on 11 September 2025

6.	Any Executive Decisions which have been 'called in'	21 - 22

Matters for Recommendation to the Cabinet

7.	Local Government Reorganisation - Business Case Submission	23 - 246

Following publication of the English Devolution White Paper in December 2024, the Councils were invited to make an interim submission to Government on 21 March 2025 setting out its preferred geography for new Unitary Councils across Kent. This was for the three unitary model, which the evidence demonstrated was the most financially sustainable option while aligning with the Government's stated criteria including population size, identity, and using borough boundaries as the building blocks. This report brings together the detailed evidence-based work on the business case that has been undertaken to meet the Government's deadline of 28 November 2025.

8.	Annual Service Delivery Plan Quarter 2 (2025/26) Reporting	247 - 272

This covering report and annex provides data on the performance of the Council during Quarter 2 of 2025/26 in relation to the milestones and Key Performance Indicators (KPIs) set out in the Annual Service Delivery Plan 2025/26.

Matters for Information

9.	Tonbridge and Malling Leisure Trust - Annual Report	273 - 274

Representatives of the Leisure Trust to provide an update on activities, management and performance during the past year.

10. Outside Body Update - West Kent Health Integrated Care Partnership Elected Members Forum — 275 - 276

The Borough Council's Outside Body appointee, Cllr K Tanner, to provide a summary of recent activities.

11. Record of Decisions taken by the Executive — 277 - 278

A record of decisions taken the Cabinet and/or Cabinet Members since the last meeting of the Committee is attached for information.

12. Notice of Forthcoming Key Decisions — 279 - 284

The Notice of Key Decisions anticipated to be taken during the period November 2025 to January 2026 is attached. This may be subject to change due to adjustments to the reporting timetable.

13. Work Programme — 285 - 286

The Work Programme setting out matters to be scrutinised during 2025/26 is attached for information. Members can suggest future items by liaising with the Chair of the Committee.

14. Urgent Items — 287 - 288

Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

Matters for consideration in Private

15. Exclusion of Press and Public — 289 - 290

The Chairman to move that the press and public be excluded from the remainder of the meeting during consideration of any items the publication of which would disclose exempt information.

PART 2 - PRIVATE

16. Urgent Items — 291 - 292

Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

MEMBERSHIP

Cllr Mrs A S Oakley (Chair)
Cllr L Athwal (Vice-Chair) and Cllr K B Tanner (Vice-Chair)

Cllr Mrs S Bell
Cllr T Bishop
Cllr C Brown
Cllr R I B Cannon
Cllr L Chapman
Cllr A Cope
Cllr P M Hickmott
Cllr M A J Hood
Cllr F A Hoskins
Cllr S A Hudson
Cllr D W King
Cllr A McDermott
Cllr W E Palmer
Cllr D Thornewell
Cllr C J Williams

GUIDANCE ON HOW MEETINGS WILL BE CONDUCTED

(1) Most of the Borough Council meetings are livestreamed, unless there is exempt or confidential business being discussed, giving residents the opportunity to see decision making in action. These can be watched via our YouTube channel. When it is not possible to livestream meetings they are recorded and uploaded as soon as possible:

https://www.youtube.com/channel/UCPp-IJlSNgoF-ugSzxjAPfw/featured

(2) There are no fire drills planned during the time a meeting is being held. For the benefit of those in the meeting room, the fire alarm is a long continuous bell and the exits are via the doors used to enter the room. An officer on site will lead any evacuation.

(3) Should you need this agenda or any of the reports in a different format, or have any other queries concerning the meeting, please contact Democratic Services on committee.services@tmbc.gov.uk in the first instance.

Attendance:

- Members of the Committee are required to attend in person and be present in the meeting room. Only these Members are able to move/ second or amend motions, and vote.
- Other Members of the Council can join via MS Teams and can take part in any discussion and ask questions, when invited to do so by the Chair, but cannot move/ second or amend motions or vote on any matters. Members participating remotely are reminded that this does not count towards their formal committee attendance.
- Occasionally, Members of the Committee are unable to attend in person and may join via MS Teams in the same way as other Members. However, they are unable to move/ second or amend motions or vote on any matters if they are not present in the meeting room. As with other Members joining via MS Teams, this does not count towards their formal committee attendance.
- Officers can participate in person or online.

- Members of the public addressing an Area Planning Committee should attend in person. However, arrangements to participate online can be considered in certain circumstances. Please contact committee.services@tmbc.gov.uk for further information.

Before formal proceedings start there will be a sound check of Members/Officers in the room. This is done as a roll call and confirms attendance of voting Members.

Ground Rules:

The meeting will operate under the following ground rules:

- Members in the Chamber should indicate to speak in the usual way and use the fixed microphones in front of them. These need to be switched on when speaking or comments will not be heard by those participating online. Please switch off microphones when not speaking.
- If there any technical issues the meeting will be adjourned to try and rectify them. If this is not possible there are a number of options that can be taken to enable the meeting to continue. These will be explained if it becomes necessary.

For those Members participating online:

- please request to speak using the 'chat or hand raised function';
- please turn off cameras and microphones when not speaking;
- please do not use the 'chat function' for other matters as comments can be seen by all;
- Members may wish to blur the background on their camera using the facility on Microsoft teams.
- Please avoid distractions and general chat if not addressing the meeting
- Please remember to turn off or silence mobile phones

Voting:

Voting may be undertaken by way of a roll call and each Member should verbally respond For, Against, Abstain. The vote will be noted and announced by the Democratic Services Officer.

Alternatively, votes may be taken by general affirmation if it seems that there is agreement amongst Members. The Chairman will announce the outcome of the vote for those participating and viewing online.

This page is intentionally left blank

Overview and Scrutiny Committee					
	Conservative	**Liberal Democratic**	**Green**	**Ind. Kent Alliance**	**Labour**
1	Dave Davis	Bill Banks	Kath Barton		Angus Bennison
2	James Lark	Paul Boxall	Steve Crisp		
3	Mark Rhodes	Garry Bridge	Robert Oliver		
4	Keith Tunstall	Trudy Dean	Bethan Parry		
5	Colin Williams	Roger Roud	Stacey Pilgrim		
Members of Cabinet cannot be appointed as a substitute to this Committee					

May 2025

This page is intentionally left blank

Declarations of interest

This page is intentionally left blank

TONBRIDGE AND MALLING BOROUGH COUNCIL

OVERVIEW AND SCRUTINY COMMITTEE

MINUTES

Thursday, 11th September, 2025

Present: Cllr Mrs A S Oakley (Chair), Cllr L Athwal (Vice-Chair), Cllr K B Tanner (Vice-Chair), Cllr Mrs S Bell, Cllr C Brown, Cllr R I B Cannon, Cllr L Chapman, Cllr A Cope, Cllr P M Hickmott, Cllr M A J Hood, Cllr F A Hoskins, Cllr S A Hudson, Cllr D W King, Cllr W E Palmer, Cllr D Thornewell, Cllr D A S Davis (substitute) and Cllr Mrs T Dean (substitute)

In attendance: Cllrs A G Bennison, D Keers, A Mehmet, R P Betts*, M D Boughton*, M A Coffin*, M R Rhodes*, R V Roud* and M Taylor* were also present pursuant to Council Procedure Rule No 15.21.

(*participated via MS Teams)

Apologies for absence were received from Councillors T Bishop and A McDermott

PART 1 - PUBLIC

OS 25/39 NOTIFICATION OF SUBSTITUTE MEMBERS

Notification of substitute members were recorded as set out below:

- Cllr D Davis substitute for Cllr A McDermott
- Cllr T Dean substitute for Cllr T Bishop

In accordance with Council Procedure Rules 17.5 to 17.9 these Councillors had the same rights as the ordinary member of the committee for whom they were substituting.

OS 25/40 DECLARATIONS OF INTEREST

There were no declarations of interest made in accordance with the Code of Conduct.

OS 25/41 MINUTES

RESOLVED: That the Minutes of the meeting of the Overview and Scrutiny Committee held on 26 June 2025 be approved as a correct record and signed by the Chair.

OS 25/42 SOUTH EAST COUNCILS - OUTSIDE BODY UPDATE

The Borough Council's outside body representative on South East Councils, (Councillor M Boughton) explained that the organisation united local authorities across the region, advocated for regional priorities and sought to attract increased investment to benefit the area.

Additionally, it oversaw collaborations such as the Migration Partnership and administered the All-Party Parliamentary Group for the Southeast.

OS 25/43 MOTION WITHOUT NOTICE

In accordance with Council Procedure Rule 5.30 (c), the Chair proposed that the order of business on the agenda be changed and the Annual Service Delivery Plan 2025/26 – Quarter 1 (item 9) be considered before the Angel Leisure Centre Replacement Project. This was seconded by Cllr Cope and the Committee

RESOLVED: That the order of business on the agenda be changed as proposed by the Chair.

<u>MATTERS FOR RECOMMENDATION TO THE CABINET</u>

OS 25/44 ANNUAL SERVICE DELIVERY PLAN 2025/26 - QUARTER 1

The report of the Chief Executive provided data on the performance of the Borough Council during quarter 1 of 2025/26 in relation to the milestones and Key Performance Indicators (KPIs) set out in the Annual Service Delivery Plan 2025/26.

A strong level of performance had been achieved with 70% of activities making good progress. Overall, only 2 activities were red rated and these both related to delays caused by Government.

A satisfactory level of progress had been achieved for 52% of KPIs and included reduced number of complaints, reduced number of Anti-social Behaviour cases reported and 99.6% of invoices paid within the 30-day deadline. Due to some longstanding issues and recent dips in performance 26% of KPIs were red-rated.

Members appreciated the opportunity to assess performance and identified several matters for discussion:

- It was clarified that the managed return to IDOX was making positive progress and that project management was now handled by the Transformation Manager at the Borough Council;

- Questions were raised about the increase in fly tipping incidents and the implementation of higher fines. It was noted that the Borough Council received a share of paid fines. Plans would be made to provide Members with updated data on enforcement and to ensure new signage about fines was displayed.

- Members discussed the need for improved communication with community groups and made particular reference to recent changes at Barden Lake and the use of new substrates on footpaths. Officers committed to providing more information and ensuring that future works were communicated effectively, especially in the absence of a user group.

- Work was ongoing to identify locations for the installation of Digital Information Boards and contractual provisions for the prompt restoration of out-of-action sites would be considered.

- Clarification was sought on targets for crime statistics and fly tipping and the cumulative nature of targets and the rationale behind amber ratings was explained.

- Members suggested that questions be submitted in advance of meetings to allow for more comprehensive responses.

The Chair proposed, seconded by Cllr Hudson and the Committee

*RECOMMENDED: That

(1) appreciation be recorded for the overall progress made during Quarter 1;

(2) appreciation be recorded for the achievements made during Quarter 1; and

(3) the areas needing focus be noted.

***Recommended to Cabinet**

OS 25/45 ANGEL LEISURE CENTRE - REPLACEMENT PROJECT

Members were advised that good progress had been made with the Angel Leisure Centre replacement project as part of the RIBA Stage 2.

The public engagement exercise had commenced and would run until 24 September 2025. Currently, over 1,000 responses had been received and reflected a strong public interest in the project. Members queried how many of these responses were outside of Tonbridge and it was indicated that this information could be collated once the consultation had finished. It was also suggested that the consultation could be promoted wider throughout the Borough via Larkfield Leisure Centre, other suitable locations and parish/town councils.

The selection of the main contractor was progressing alongside RIBA Stage 2 and Officers and the Cabinet Members for Infrastructure and Tonbridge Regeneration; and Finance, Waste and Technical Services would be involved in the procurement process.

Particular reference was made to the importance of meeting deadlines due to anticipated local government reorganisation and potential future borrowing controls. The potential for a new unitary authority to deprioritise local leisure facilities was identified as a risk by Members and it was reiterated that the project timeline was designed to address these risks and that timely decision-making was critical.

Whilst the final design was currently being developed it was expected to include a larger gym, group exercise studios, dedicated spin studio, soft play and café, multiple use community facilities and a sports hall, together with changing rooms and flexible multi-purpose rooms.

Members highlighted the need for the new centre to serve both leisure and broader community purposes and referred to feedback from the Tonbridge Civic Society and past uses of the centre. The Committee was assured that the proposed facility mix included three community rooms, flexible spaces and that community use was a key consideration in the design.

On the grounds that Members wished to discuss commercially sensitive financial information, the Chair proposed, Cllr Tanner seconded and the Committee

RESOLVED: That the press and public be excluded from the remainder of the consideration of this matter to avoid the disclosure of exempt information.

(The recommendations arising from this discussion are set out in OS 25/51)

OS 25/46 EXECUTIVE/SCRUTINY PROTOCOL

Members were invited to review the effectiveness of the Executive-Scrutiny Protocol (attached as Annex 1) to ensure that it remained fit for purpose.

The Chair of the Overview and Scrutiny Committee had been consulted and had requested that the section of the Protocol dealing with the Scrutiny Work Programme be amended to include reference to IT Strategies within the standing items for consideration. The Protocol attached at Annex 1 had been amended to include this reference.

It was clarified that the proposed amendment related to IT Policies and Strategies rather than individual projects. Members recognised the importance of regular scrutiny of IT matters, citing the anticipated impact of technological changes such as AI over the next decade and the need for the Borough Council to proactively address these developments.

On the grounds of the increasing importance and reliance on IT, the Chair proposed, Cllr King seconded and the Committee

*__RECOMMENDED__: That the revised Protocol (at Annex 1) be approved.

***Recommended to Cabinet**

MATTERS FOR DECISION UNDER DELEGATED POWERS

OS 25/47 INFORMATION RIGHTS REQUEST - UPDATE

The report of the Director of Central Services provided an update on the discharge of the Borough Council's duties in managing requests for information made under the Freedom of Information Act 2000 (FOI), the Environmental Information Regulations 2004 (EIR), the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 (DPA).

Members were advised of the increasing volume and complexity of information rights requests, which had risen from approximately 720 three years ago to over 1,223 last year. This increase was attributed to greater public awareness, more requests from organisations and the frequent use in contentious matters e.g., planning applications.

Requests for information were currently managed by devolving responsibility to individual service co-ordinators, which had led to increased workloads and pressure on these services especially as requests were increasingly complex. In addition, the current system was manual, lacked efficiency and with no dedicated Information Governance Officer there was a potential risk of non-compliance with statutory response deadlines and data protection legislation.

It was clarified that while the Information Commissioner had the power to levy significant fines for non-compliance, there was generally a reluctance to fine local councils and other enforcement actions were preferred. However, the maximum fine could be up to £17.5 million or 4% of turnover.

A dedicated resource could help manage the increasing volume and complexity of requests more effectively, support transparency and mitigate risk. Due to the growing demand and burden of requests, the Committee supported reviewing options for managing information requests with any proposals to be considered by the General Purposes Committee in the first instance.

The Chair proposed, Cllr King seconded and the Committee

RESOLVED: That

(1) the contents of the report be noted; and

(2) a review of resources for the management of information requests be supported, subject to any proposals being considered by the General Purposes Committee and the Council.

MATTERS FOR INFORMATION

OS 25/48 RECORD OF DECISIONS TAKEN BY THE EXECUTIVE

The decisions taken by the Cabinet and Cabinet Members during August 2025 were presented for information and noted by the Committee.

OS 25/49 WORK PROGRAMME

The Work Programme setting out potential matters to be scrutinised during 2025/26 was noted. Members were invited to suggest future items by liaising with the Chair of the Committee.

MATTERS FOR CONSIDERATION IN PRIVATE

OS 25/50 EXCLUSION OF PRESS AND PUBLIC

The Chair moved, it was seconded by Cllr Tanner and

RESOLVED: That as public discussion would disclose exempt information the remainder of the Angel Leisure Centre replacement project be considered in private.

(The public discussion is reflected in OS 25/45)

OS 25/51 ANGEL LEISURE CENTRE - REPLACEMENT PROJECT

(Reasons: Part 2 Private – LGA 1972 Sch 12A Paragraph 3 – Financial or business affairs of any particular person)

There was detailed and robust discussion on financial and value for money considerations, the potential risks in respect of local government reorganisation, asset disposal, borrowing of funds, potential loss of investment and repayment of loans.

A concern was also raised regarding the lack of a detailed and costed business case. Members were reassured that a business case had been developed as part of the feasibility study and was continually reviewed and refined as the project progressed. It was anticipated that a final costed business case could be presented to Members in 2026 when seeking approval for the final construction.

The Chair proposed, Cllr Athwal seconded and the Committee

***RECOMMENDED**: That

(1) the Tonbridge Town Centre Programme Board give consideration to potential options around how any proceeds arising from the redevelopment of the current Angel Centre site could be used to offset any debt incurred in relation to the provision of the new leisure centre; and

(2) the intention to present a fully costed business case to Members in advance of seeking approval for the final construction of the Angel Leisure Centre replacement be noted; and

(3) the progress being made on the replacement of the Angel Leisure Centre, Tonbridge be noted.

***Recommended to Cabinet**

The meeting ended at 9.46 pm

This page is intentionally left blank

Any Executive Decisions which have been “called in”

This page is intentionally left blank

Overview and Scrutiny Committee

13 November 2025

Part 1 - Public

Recommendation to Cabinet

Cabinet Member	Cllr Matt Boughton, Leader of the Council
Responsible Officer	Damian Roberts, Chief Executive
Report Author	Damian Roberts, Chief Executive Jeremy Whittaker, Economic Development and Special Projects Manager

Local Government Reorganisation – Business Case Submission

1 Summary and Purpose of Report

1.1 Following the publication of the English Devolution White Paper in December 2024, the Councils were invited to make an interim submission to Government on 21 March 2025 setting out its preferred geography for new Unitary Councils across Kent. This was for the three unitary model, which the evidence demonstrated was the most financially sustainable option while aligning with the Government's stated criteria including population size, identity, and using borough boundaries as the building blocks. This report brings together the detailed evidence-based work on the business case that has been undertaken to meet the Government's deadline of 28 November 2025.

2 Corporate Strategy Priority Area

2.1 Efficient services for all our residents, maintaining an effective council.

3 Recommendations

3.1 Members are invited to consider the draft submission that has been produced using available evidence to meet the Government's deadline of 28 November and to provide any comments.

4 Introduction and Background

4.1 On 16 December 2024, HM Government published the English Devolution White Paper setting out its ambition to reshape local government in England through a combination of devolution to new strategic authorities and reorganisation of all of the remaining two-tier local government areas in England into unitary authorities. To keep Members informed of this development, the Council undertook an all-

Member briefing on 23 December 2024 to outline the contents of the White Paper and the possible implications for the Council and the Borough followed by further discussion at Overview and Scrutiny Committee in January 2025 as well as Parish Partnership Panel, Tonbridge Community Forum and Full Council in February 2025.

4.2 The English Devolution and Community Empowerment Bill published on 10 July 2025 formalised HM Government's intentions to enact these changes.

4.3 In response to the White Paper, Council Leaders in Kent were invited to apply for, and submitted a formal request to receive priority status to be included in the Devolution Priority Programme (DPP). If successful, this would have accelerated the devolution process and provided additional resources, freedoms and flexibilities for those Councils on the DPP.

4.4 On 5 February 2025 Government notified Councils in Kent and Medway in a letter from the then Local Government Minister that they were not selected to be on the DPP and instead received a statutory invitation to submit proposals for Local Government Reorganisation (LGR). This included guidance around the development of proposals and an expectation that all 14 Councils would collaborate [**Annex 1**].

4.5 The letter detailed a timeline for the process, including a requirement for a joint interim proposal by 21 March 2025 setting out direction of travel and intentions, and a deadline of 28 November 2025 to receive a final submission on reorganisation. Kent Council Leaders agreed to endeavour to work together to respond to the Minister's direction.

4.6 Following approval at Cabinet on 19 March 2025, the Council, along with the other Councils in Kent, submitted an interim response setting out the Council's commitment to working together on reorganisation, highlighting examples of exceptional challenges faced within the Kent region, the importance of aligning devolution with local government reorganisation and the risks of not having a strategic countywide body for Kent. Alongside the collective response signed by all 14 Council Leaders, Tonbridge and Malling Borough Council together with the other Councils in West Kent – i.e. Tunbridge Wells, Sevenoaks and Maidstone, also wrote to the Government setting out the case for a West Kent Unitary, as part of a 3 Unitary solution for Kent [**Annex 2**].

4.7 Government has been clear that councils are expected to work together to develop LGR proposals for their areas. Each area nationally has been allocated funding to contribute towards the development of proposals. Kent and Medway were allocated £514,410.

4.8 Kent Council Leaders agreed to use this money collectively to develop a shared evidence base, options appraisal and business case(s) to prepare for the 28 November 2025 submission and procure the necessary external support and expertise to meet the deadline. KPMG were appointed as the Kent Councils Strategic Business Partner following a joint procurement process for Phases 1 and 2 as set out below and commenced work with all 14 Councils in July 2025.

4.9 The work is split into 4 phases as follows:

Phase 1 – Evidence Base and Options Appraisal: KPMG work with all 14 Councils to develop a single, impartial, shared evidence base and options appraisal, identifying a long list of options (geographies) and appraising them according to the Minister's specified criteria. This work then underpins Kent Council Leaders' decision on which options to proceed to full business case.

Phase 2 – Strategic Business Case Development: Informed by Kent Council Leaders' decision, KPMG will then work with all 14 Councils on preparing and refining the chosen options into strategic business cases in preparation for 28 November 2025 submission deadline.

Phases 3 and 4 – Ongoing Support to Vesting Day Requirements: Following Ministerial decision (expected in Summer 2026), significant work will then be required to prepare for transition from the existing 14 Councils to the new Unitary Council(s) in a safe and legal way. Phase 3 will run from Ministerial decision to election to shadow authority(s), and Phase 4 from election to shadow authority(s) to vesting day (the day upon which formal responsibility is handed over).

4.10 A further procurement process will be required for any additional external support determined necessary for Phases 3 and 4. The existing contract with KPMG is for Phases 1 and 2 only.

5 Progress on Phases 1 and 2

5.1 Initially seven potential options were in scope. However, by taking an evidence-based approach supported by the Strategic Partner, there was broad support for the funding to be applied to the development of **Options 3a and 4b,** with any other options, if taken forward, being funded by individual Councils. Both Options 3a and 4b provide a West Kent Geography that reflects this Council's preferred approach i.e. that would bring together this Council with Sevenoaks, Tunbridge Wells and Maidstone and relevant parts of the County to form a West Kent Unitary.

5.2 Subsequently, Kent County Council (Option 1a), Medway Council (Option 4d) and Dartford and Gravesham Borough Councils (Option 5a) (options illustrated in Annex 3) confirmed that they would self-fund strategic business cases for these further options. Ultimately, business cases can be submitted by individual councils or groups of councils. However, each council can only support one case each, covering the whole Kent and Medway geography.

6 Business Case – Option 3a

6.1 The business case for Option 3a is provided in **Annex 3**. This option proposes a 3-unitary model with the West Kent authority comprising Tonbridge and Malling, Sevenoaks, Tunbridge Wells and Maidstone areas. It is potentially supported by five councils across Kent (the West Kent councils plus Folkestone and Hythe), although these Councils have still to complete their formal decision-making processes during November.

6.2 As stated in the business case, Option 3a:

- Offers the most efficient and least disruptive of the valid options for Kent, enabling long-term financial sustainability.
- Creates strong alignment with the geographies of public service partners, including health, police and fire service.
- Preserves identity whilst strengthening governance and resilience.
- Provides alignment with transport networks and travel-to-work areas.
- Produces the most balanced population distribution across Unitaries.
- Most closely aligns with the Government's stated criteria for Local Government Reorganisation.
- Reflects the position confirmed by Council through the interim submission subsequently made to Government in March 2025.

6.3 In comparison, Option 4b (which proposes a 4-unitary model) still puts forward a West Kent unitary authority comprising Tonbridge and Malling, Sevenoaks, Tunbridge Wells and Maidstone areas, however Swale, Ashford, and Folkestone and Hythe would form a Mid-Kent unitary authority in addition to North Kent and East Kent.

6.4 As such, whilst there is no difference in terms of the proposed West Kent geography, Option 4b does not offer the same level of efficiency savings and financial sustainability across Kent, nor does it align as well with the geography of other statutory public service providers.

6.5 As such, of the two options selected for the collective process, the Option 3a business case is still recommended as the preferred option based on the evidence prepared for the submission to Government.

7 Post-Submission

7.1 Following submission, it is likely there will be a period of several months until the Council receives notice of the Minister's decision on a selected option and geography. Indications are this will likely be early Summer 2026.

7.2 In the interim, learning from other areas that have been through reorganisation before, it will be important for Councils to collectively prepare for Phases 3 and 4 so that they will be ready to progress the necessary and extensive transition work required to ensure services are safe and legal on day 1 of the new Unitary Council(s) on 1 April 2028.

7.3 Therefore, whilst waiting for decision, it is envisaged that Councils in Kent will continue to work collaboratively and focus on putting in place the arrangements required to procure a strategic business partner to support the significant additional work that will be required ahead of April 2028.

8 Financial and Value for Money Considerations

8.1 The cost of developing a business case is being funded from a Government Grant of £514,410 paid directly to the Kent County Council (KCC) and being held on behalf of all Councils in Kent. The procurement of management consultants, KPMG, was undertaken by KCC and representatives from other Councils in Kent, including the Chief Executive of this Council. The specification reflected the input of all Councils and aligned to the Government's stated requirements.

8.2 KPMG have provided and used a model to assess the unitary options submitted by individual councils using Government-defined criteria. Their approach is based on a high-level, top-down financial model that estimates the impact of disaggregating and aggregating existing services. This model applies broad assumptions regarding potential savings in staffing, property, and third-party expenditure based upon information requested by KPMG and supplied by the Kent Authorities.

8.3 The modelling is based on current budgeted 2025-26 spend and forecast spend in subsequent years from the 14 individual councils. As far as possible this spend has been compiled on a like-for-like basis using the definitions used in statutory returns. These are based on net service spend before any income from central government grants or local taxation. This may differ from how spend is reported internally within the individual councils.

8.4 The Kent Finance Officer Group (KFOG) have collectively agreed on the following position on the analysis carried out:

- LGR, whilst generally expected to be positive for local government finances in the long term, will not solve the cost, demand and associated funding challenges currently being faced. The scope of the financial modelling considers purely the impact of reorganisation, all other things being equal.

- The work carried out at this stage is not a zero-based exercise of the financial impact of LGR. Assumptions are based on the past LGR business cases produced to support other areas which have been through the LGR submission process in recent years.

- Due to the size and number of councils in Kent, there is not a fully comparable example of recent reorganisations elsewhere in the country to confidently benchmark against. Due to the level of complexity, payback periods in Kent may therefore be longer than some other reorganisations.

- The speed of delivery and level of savings post vesting day of the new councils will largely be impacted by decisions already made by the predecessor authorities and those taken by the new authorities. These include decisions in relation to contractual obligations, borrowing, transformation and wider public service reform.

- The financial modelling does not take account of how transition costs will be funded.

- The assumptions in the model have not been tested against actual outturn data for any of the previous local government reorganisation programmes.

- Given the context above, the modelling should not be seen as a set of targets that new authorities may be held to account for, as setting the post-vesting day budget will be the responsibility of the new authorities.

- Consolidation of assets, reserves and debt is outside the scope of this work and will have material implications under any of the unitary options proposed.

8.5 Whilst being fully supportive of the long-term benefits of LGR, all Kent Finance officers agree that LGR does not in itself provide a viable solution to the scale of the financial challenge faced. The modelling is a high-level assessment of the quantum and timing of potential additional revenue costs and savings arising from the reorganisation of councils. The modelling is designed to enable a reasonable like-for-like comparison of the potential costs and savings and ultimately pay-back periods under the possible different new unitary configurations. As such it does not make any assessment of financial viability of future new unitary councils.

8.6 However, there are limitations to this methodology. The model does not fully reflect the operational complexities of local government, including:

- Evolving property usage post-pandemic, which may affect assumptions around estate rationalisation.

- Long-term contractual arrangements that may restrict the ability to realise economies of scale.

- Local variations in service delivery models and partnership arrangements.

8.7 With regards to income, the model assumes that council tax will be equalised. However, this is contingent upon two key factors, adherence to the council tax referendum principles and particular Alternative Notional Amounts being issued by the Minister and secondly, acceptance by the public. Ultimately, this decision will rest with the newly formed unitary authorities, and the model reflects an assumption rather than a confirmed outcome.

8.8 The cost of reorganisation is substantial but there is no certainty that the modelled savings will materialise to the scale required to offset these costs in the short term.

8.9 The model does not incorporate the potential impact of the Fair Funding Review 2.0 and Business Rates Reset, nor does it account for existing budget gaps within individual authorities' Medium-Term Financial Strategies. These financial pressures will persist regardless of reorganisation and are not addressed within the scope of the options appraisal.

8.10 The Council currently holds a reserve balance of £200,000 to assist with internal issues that could arise up to vesting day, however it is felt that due to potential officer secondment on project roles, to maintain business as usual functions some back-filling of post may be required. As such officers are reviewing resources in order to adequately fund such needs. It is not clear how councils can fund the cash-flow requirements or the extent of any government funding. Most costs will occur in the early years of the new unitaries with the expectation that future savings can be delivered.

9 Risk Assessment

9.1 Reorganisation of councils on this scale has not taken place anywhere else in the country either in terms of the number of councils, the size of population or quantum of finances.

9.2 Delivery of business as usual of current councils is at risk, whilst attention is diverted to the formation of shadow authorities.

9.3 The financial difficulties of the Local Government Sector are well documented and can be linked to a system of underfunding and a lack of local flexibility around taxation and income generation. Changes to the geography of councils does not overcome these financial issues which require proper fiscal devolution.

9.4 The business case by KPMG does not include treasury management activities which could have fundamental implications for the cash-flow of a new unitary, including headroom for further borrowing. Tonbridge and Malling are one of two Councils in the County that have no debt registered on its balance sheet and a third council only has debt to support its Housing Revenue Account. It has yet to be determined on how any current levels of debt will be consolidated to the new authorities.

9.5 If a local authority decides to not provide a submission to government by 28 November, it will lose its influence over the outcome, and the Minister will proceed to a decision based on their own preference for local government reorganisation or the preference of other councils that have made submissions and in absence of meaningful local knowledge and understanding of the area or its strategic opportunities and challenges.

9.6 There is also a risk that a decision from the Minister on the chosen option and geography will be delayed and this will have subsequent impacts on the timeline for work to be completed in Phases 3 and 4. This can be mitigated by ensuring regular communication between MHCLG, Local Authority Chiefs, Kent Council Leaders.

9.7 It should also be highlighted that any options for Local Government Reorganisation that involve breaking established borough boundaries, creates significant additional risk. This relates to Options 4d and 5a only. This is because of the additional complexity and uncertainty it causes, which arises from the greater number of Borough and District Councils that would have to be involved in the creation of each new Unitary. In addition, the significant number of Council services that would have to be split across multiple Unitary Councils where much of the baseline data necessary to do this well does not currently exist. This additional disaggregation risk for Borough and District services does not arise for the other options.

9.8 Local Government Reorganisation is therefore seen as a major risk and has been added to the Strategic Risk Register to be overseen by Management Team with reporting to the Audit Committee as part of the cycle of committees.

9.9 The Council's project management processes will be adopted in full throughout the LGR timeline, to assist with smooth preparation and delivery and to help mitigate risk.

10 Legal Implications

10.1 The English Devolution White Paper sets out an expectation that all two-tier areas such as Kent will develop proposals for LGR.

10.2 Following on from this, the Secretary of State has invited the Leaders of all fourteen councils in Kent and Medway to submit proposals for a single tier of local government under Part 1 of the Local Government and Public Involvement in Health Act 2007 ('the 2007 Act').

10.3 The 2007 Act has procedures for creating a single tier of local government in areas which were previously comprised of two tiers and these are set out in stages.

10.4 The first stage of the procedure under section 2 of the 2007 Act, provides that the Secretary of State may invite any "principal authority" (defined in section 1(1) as a county or district council) to make a proposal for a single tier of government in an area which currently has two tiers of local government.

10.5 The second stage under section 3 of the 2007 Act, is the submission of a proposal by a local authority in response to an invitation. In responding to an invitation, a local authority must have regard to any guidance issued by the Secretary of State. This guidance was included in the invitation letter to all leaders in Kent dated 5 February 2025 and set out an expectation on Councils to consider wide local engagement, at the stage when their full proposals were being worked up.

10.6 This is a duty on Councils to have regard to the guidance but it does not directly impose a legal obligation on Councils to carry out a consultation. Responsibility for consultation during proposals for new local authorities, is primarily held by the Secretary of State.

10.7 The third stage in the process, relates to implementation of a proposal. Once the proposals set out in this report have been received, the Secretary of State will consider them and if minded to implement a proposal by order (either with or without modification), the Secretary of State must consult every authority affected by the proposal (except the one(s) that submitted it and any other persons the Secretary of State considers appropriate). There is no requirement on the Secretary of State to consult on every proposal received.

10.8 Following the consultation described above, if the Secretary of State decides to proceed with one of the reorganisation proposals (with or without modifications), then a detailed Structural Change Order (SCO) will be required to implement the government decision to change the local government structure. The SCO will provide for the necessary details of the change, such as dealing with the transfers of powers, property, assets, and staff, as well as any boundary and electoral changes necessary to give effect to the reorganisation, will need to be laid in Parliament. This will also set out a timescale for implementation of the new structures and sets out interim arrangements.

10.9 The Kent Secretaries Group on behalf of most Monitoring Officers across the County obtained external legal advice from leading Counsel which concluded that the decision to submit a final plan in November is an executive decision and also a key decision.

11 Consultation and Communications

11.1 The Council has made a concerted effort to keep staff informed of progress in an open and transparent way, recognising the fact that any change or restructure in local government will have an impact on staff. This has taken the form of regular drop-in sessions, all-staff briefings and regular internal news articles.

11.2 There was no statutory requirement on the Council to consult residents affected by a proposed reorganisation (see legal section). Formal statutory consultation will be undertaken by the Government in the new year, once submissions are made by Councils in November. The Government have indicated that they intend to consult on all valid options.

11.3 Some early and limited engagement awareness raising of Local Government Reorganisation has taken place. This has been by joint process co-ordinated through Kent Leaders and facilitated by Canterbury City Council Communications Team, with input from officers from every Council. This has included an open public survey, open to anyone to complete, which was carried out between 8 September and 6 October 2025. The survey was a standardised resident survey, agreed by all Kent Councils. A summary of the key indicative findings include:

- 2,058 members of the public from across Kent and Medway took part in the survey.
- Overall, responders showed most interest in: the quality of services delivered, efficiency and value-for-money, the ability for people to influence decisions where they live and work, the length of time it takes to fix a problem and the amount of Council Tax they pay.
- Responders were ambivalent about: size of area covered by a council, ability to contact their local councillor, the total number of councillors in the authority, the number of residents in each electoral ward.
- Responders did not care about the ability to visit a council office in person or the ability to attend council meetings near them.
- The largest concerns about Local Government Reorganisation were:

    a) the lack of localised support (595 comments)

    b) the costs of implementation and the disruption caused (294 comments)

    c) that it would result in less accountability (287 comments).

11.4 Stakeholder and Partner engagement also took place for the Interim Submission in March 2025. The engagement sought to understand:

- What are the key factors that should be taken into account for reorganisation
- What opportunities could be realised by reorganisation
- What problems could be fixed by reorganisation
- What problems could be created or will not fixed by reorganisation.

11.5 Kent Councils recognised the importance of close collaboration with their partners and the opportunities for Public Sector Reform. Therefore, Workshops were also undertaken with key strategic partners. These workshops explored the options being considered, and having an open discussion on:

- Challenges in the current system and ways of working
- Strengths in current ways of working to be protected and/or built upon
- Opportunities that LGR brings to improve ways of working.

11.6 The approach to public and stakeholder engagement was not specifically aimed at gauging support for specific options, but rather at exploring the potential benefits and opportunities, alongside any concerns or challenges associated with the proposals. However, a number of the statutory public service providers (such as the health, police and fire services) did provide very positive feedback on Option 3a. This engagement has enabled Councils to take a well-informed and thoughtful approach in addressing these factors within the proposals.

12 Cross Cutting Issues

12.1 Climate Change and Biodiversity

12.1.1 Limited or low impact on emissions and environment.

12.1.2 Climate change advice has not been sought in the preparation of the options and recommendations in this report.

12.2 Equalities and Diversity

12.2.1 An initial Equalities Impact Assessment has been undertaken [**Annex 4**] which sets out the potential for both positive and negative impacts for residents with protected characteristics. Further work on potential impacts, along with the most effective related mitigations, will be undertaken as part of the more detailed implementation process which will take place once Government has decided on the option for Local Government Reorganisation that will be taken forward for Kent.

12.3 Other If Relevant

- Human Resources
- Business Continuity / Resilience

12.3.1 Any change or restructure of local government will impact staff. The prospect of change can be unsettling, and staff are understandably concerned. As an employer, the Council is committed to open and transparent communication throughout the process and in supporting staff through the transition process to enable them to have the best possible opportunity to access roles in the new unitary authority.

12.3.2 While structures will certainly change along the way, the need for high quality local government services, and highly skilled, knowledgeable and committed staff to deliver them, will be more important than ever.

Background Papers	English Devolution White Paper “Power and Partnership: Foundations for Growth”: English Devolution White Paper Kent Leaders website – setting out draft business cases for other options to be submitted to Government.
Annexes	Annex 1 – Letter from Government (05 February 2025) Annex 2 – Letter from West Kent Councils (21 March 2025) Annex 3 – Option 3a Business Case Annex 4 – Draft Equalities Impact Assessment

Annex 1

Jim McMahon OBE MP
Minister of State for Local Government and English Devolution
2 Marsham Street
London
SW1P 4DF

Ministry of Housing, Communities & Local Government

Your reference:
Our reference:

To: Leaders of two-tier councils and unitary council in Kent
Ashford Borough Council
Canterbury City Council
Dartford Borough Council
Dover District Council
Folkstone and Hythe District Council;
Gravesham Borough Council
Kent County Council
Maidstone Borough Council
Sevenoaks District Council
Swale Borough Council
Thanet District Council
Tonbridge and Malling Borough Council
Tunbridge Wells Borough Council
Medway Council

5 February 2025

Dear Leaders

This Government has been clear on our vision for simpler, more sustainable, local government structures, alongside a transfer of power out of Westminster through devolution. We know that councils of all political stripes are in crisis after a decade of decline and instability. Indeed, a record number of councils asked the government for support this year to help them set their budgets.

This new government will not waste this opportunity to build empowered, simplified, resilient and sustainable local government for your area that will increase value for money for council taxpayers. Local leaders are central to our mission to deliver change for hard-working people in every corner of the country through our Plan for Change, and our councils are doing everything they can to stay afloat and provide for their communities day in, day out. The Government will work closely with you to deliver these aims to the most ambitious timeline.

I am writing to you now to formally invite you to work with other council leaders in your area to develop a proposal for local government reorganisation, and to set out further detail on the criteria, guidance for the development of proposals, and the timeline for this process. A formal invitation with guidance for the development of your proposals is attached at Annex A. This invitation sets out the criteria against which proposals will be assessed.

Developing proposals for reorganisation

We expect there to be different views on the best structures for an area, and indeed there may be merits to a variety of approaches. Nevertheless, it is not in council taxpayers' interest to devote public funds and your valuable time and effort into the development of multiple proposals which unnecessarily fragment services, compete against one another, require lengthy implementation periods or which do not sufficiently address local interests and identities.

The public will rightly expect us to deliver on our shared responsibility to design and implement the best local government structures for efficient and high-quality public service delivery. We therefore expect local leaders to work collaboratively and proactively, including by sharing information, to develop robust and sustainable unitary proposals that are in the best interests of the whole area to which this invitation is issued, rather than developing competing proposals.

This will mean making every effort to work together to develop and jointly submit one proposal for unitary local government across the whole of your area. The proposal that is developed for the whole of your area may be for one or more new unitary councils and should be complementary to devolution plans. It is open to you to explore options with neighbouring councils in addition to those included in this invitation, particularly where this helps those councils to address concerns about their sustainability or limitations arising from their size or boundaries or where you are working together across a wider geography within a strategic authority.

I understand there will be some cases when it is not possible for all councils in an area to jointly develop and submit a proposal, despite their best efforts. This will not be a barrier to progress, and the Government will consider any suitable proposals submitted by the relevant local authorities.

Supporting places through change

It is essential that councils continue to deliver their business-as-usual services and duties, which remain unchanged until reorganisation is complete. This includes progress towards the Government's ambition of universal coverage of up-to-date local plans as quickly as possible. To support with capacity, I intend to provide some funds for preparing to take forward any proposal, and I will share further information later in the process.

Considering the efficiencies that are possible through reorganisation, we expect that areas will be able to meet transition costs over time from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects.

The default position is that assets and liabilities remain locally managed by councils, but we acknowledge that there are exceptional circumstances where there has been failure linked to capital practices. Where that is the case, proposals should reflect the extent to which the implications of this can be managed locally, including as part of efficiencies possible through reorganisation, and Commissioners should be engaged in these discussions. We will continue to discuss the approach that is proposed with the area.

I welcome the partnership approach that is being taken across the sector to respond to the ambitious plans set out in the White Paper. My department will continue to work closely with the Local Government Association (LGA), the District Councils Network, the County Councils Network and other local government partners to plan how best to support councils through this process. We envisage that practical support will be needed to understand and address the key thematic issues that will arise through reorganisation, including managing service impacts and opportunities for the workforce, digital and IT systems, and leadership support.

Timelines and next steps for interim plans and full proposals

We ask for an interim plan to be submitted on or before 21 March 2025, in line with the guidance set out in the attached Annex. My officials will provide feedback on your plan to help support you to develop final proposals.

I will expect any full proposal to be submitted **by 28 November**. If I decide to implement any proposal, and the necessary legislation is agreed by Parliament, we will work with you to move to elections to new 'shadow' unitary councils as soon as possible as is the usual arrangement in the process of local government reorganisation.

Following submission, I will consider any and all proposals carefully before taking decisions on how to proceed. My officials are available throughout to discuss how your reorganisation and devolution aspirations might work together and what support you think you might need to proceed.

This is a once in a generation opportunity to work together to put local government in your area on a more sustainable footing, creating simpler structures for your area that will deliver the services that local people and businesses need and deserve. As set out in the White Paper, my commitment is that clear leadership locally will be met with an active partner nationally.

I am copying this letter to council Chief Executives. I am also copying this letter to local Members of Parliament and to the Police and Crime Commissioner.

Yours sincerely,

[redacted]

JIM MCMAHON OBE MP
Minister of State for Local Government and English Devolution

Annex A

LOCAL GOVERNMENT AND PUBLIC INVOLVEMENT IN HEALTH ACT 2007

INVITATION FOR PROPOSALS FOR A SINGLE TIER OF LOCAL GOVERNMENT

The Secretary of State for Housing, Communities and Local Government, in exercise of his powers under Part 1 of the Local Government and Public Involvement in Health Act 2007 ('the 2007 Act'), hereby invites any principal authority in the area of the county of Kent, to submit a proposal for a single tier of local government.

This may be one of the following types of proposal as set out in the 2007 Act:

- Type A – a single tier of local authority covering the whole of the county concerned
- Type B – a single tier of local authority covering an area that is currently a district, or two or more districts
- Type C – a single tier of local authority covering the whole of the county concerned, or one or more districts in the county; and one or more relevant adjoining areas
- Combined proposal – a proposal that consists of two or more Type B proposals, two or more Type C proposals, or one or more Type B proposals and one or more Type C proposals.

Proposals must be submitted in accordance with paragraphs 1 to 3:

1. Any proposal must be made by **28 November 2025**.
2. In responding to this invitation an authority must have regard to the guidance from the Secretary of State set out in the Schedule to this invitation, and to any further guidance on responding to this invitation received from the Secretary of State.
3. An authority responding to this invitation may either make its own proposal or make a proposal jointly with any of the other authorities invited to respond.

Signed on behalf of the Secretary of State for Housing, Communities and Local Government.

[redacted]

F KIRWAN

A senior civil servant in the Ministry of Housing, Communities and Local Government

5 February 2025

SCHEDULE

Guidance from the Secretary of State for proposals for unitary local government.

Criteria for unitary local government

1. **A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government.**

   a) 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.

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

   c) 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.

   d) 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.

2. **Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks.**

   a) As a guiding principle, new councils should aim for a population of 500,000 or more.
   b) There may be certain scenarios in which this 500,000 figure does not make sense for an area, including on devolution, and this rationale should be set out in a proposal.
   c) Efficiencies should be identified to help improve councils' finances and make sure that council taxpayers are getting the best possible value for their money.
   d) 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.
   e) For areas covering councils that are in Best Value intervention and/or in receipt of Exceptional Financial Support, proposals must additionally demonstrate how reorganisation may contribute to putting local government in the area as a whole on a firmer footing and what area-specific arrangements may be necessary to make new structures viable.
   f) In general, as with previous restructures, there is no proposal for council debt to be addressed centrally or written off as part of reorganisation. For areas where there are exceptional circumstances where there has been failure linked to capital practices, proposals should reflect the extent to which the implications of this can be managed locally, including as part of efficiencies possible through reorganisation.

3. **Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens.**
    a) Proposals should show how new structures will improve local government and service delivery, and should avoid unnecessary fragmentation of services.
    b) Opportunities to deliver public service reform should be identified, including where they will lead to better value for money.
    c) 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.

4. **Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views.**
    a) It is for councils to decide how best to engage locally in a meaningful and constructive way and this engagement activity should be evidenced in your proposal.
    b) Proposals should consider issues of local identity and cultural and historic importance.
    c) Proposals should include evidence of local engagement, an explanation of the views that have been put forward and how concerns will be addressed.

5. **New unitary structures must support devolution arrangements.**
    a) Proposals will need to consider and set out for areas where there is already a Combined Authority (CA) or a Combined County Authority (CCA) established or a decision has been taken by Government to work with the area to establish one, how that institution and its governance arrangements will need to change to continue to function effectively; and set out clearly (where applicable) whether this proposal is supported by the CA/CCA /Mayor.
    b) Where no CA or CCA is already established or agreed then the proposal should set out how it will help unlock devolution.
    c) Proposals should ensure there are sensible population size ratios between local authorities and any strategic authority, with timelines that work for both priorities.

6. **New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.**
    a) Proposals will need to explain plans to make sure that communities are engaged.
    b) Where there are already arrangements in place it should be explained how these will enable strong community engagement.

The following matters should be taken into account in formulating a proposal:

Boundary Changes

a) Existing district areas should be considered the building blocks for your proposals, but where there is a strong justification more complex boundary changes will be considered.

b) There will need to be a strong public services and financial sustainability related justification for any proposals that involve boundary changes, or that affect wider public services, such as fire and rescue authorities, due to the likely additional costs and complexities of implementation.

Engagement and consultation on reorganisation

a) We expect local leaders to work collaboratively and proactively, including by sharing information, to develop robust and sustainable unitary proposals that are in the best interests of the whole area to which this invitation is issued, rather than developing competing proposals.

b) For those areas where Commissioners have been appointed by the Secretary of State as part of the Best Value Intervention, their input will be important in the development of robust unitary proposals.

c) We also expect local leaders to engage their Members of Parliament, and to ensure there is wide engagement with local partners and stakeholders, residents, workforce and their representatives, and businesses on a proposal.

d) The engagement that is undertaken should both inform the development of robust proposals and should also build a shared understanding of the improvements you expect to deliver through reorganisation.

e) The views of other public sector providers will be crucial to understanding the best way to structure local government in your area. This will include the relevant Mayor (if you already have one), Integrated Care Board, Police (Fire) and Crime Commissioner, Fire and Rescue Authority, local Higher Education and Further Education providers, National Park Authorities, and the voluntary and third sector.

f) Once a proposal has been submitted it will be for the Government to decide on taking a proposal forward and to consult as required by statute. This will be a completely separate process to any consultation undertaken on mayoral devolution in an area, which will be undertaken in some areas early this year, in parallel with this invitation.

Interim plans

An interim plan should be provided to Government on or before **21 March 2025.** This should set out your progress on developing proposals in line with the criteria and guidance. The level of detail that is possible at this stage may vary from place to place but the expectation is that one interim plan is jointly submitted by all councils in the area. It may be the case that the interim plan describes more than one potential proposal for your area, if there is more than one option under consideration. The interim plan should:

a) identify any barriers or challenges where further clarity or support would be helpful.

b) identify the likely options for the size and boundaries of new councils that will offer the best structures for delivery of high-quality and sustainable public services across the area, along with indicative efficiency saving opportunities.

c) include indicative costs and arrangements in relation to any options including planning for future service transformation opportunities.

d) include early views as to the councillor numbers that will ensure both effective democratic representation for all parts of the area, and also effective governance and decision-making arrangements which will balance the unique needs of your cities, towns, rural and coastal areas, in line with the Local Government Boundary Commission for England guidance.

e) include early views on how new structures will support devolution ambitions.

f) include a summary of local engagement that has been undertaken and any views expressed, along with your further plans for wide local engagement to help shape your developing proposals.

g) set out indicative costs of preparing proposals and standing up an implementation team as well as any arrangements proposed to coordinate potential capacity funding across the area.

h) set out any voluntary arrangements that have been agreed to keep all councils involved in discussions as this work moves forward and to help balance the decisions needed now to maintain service delivery and ensure value for money for council taxpayers, with those key decisions that will affect the future success of any new councils in the area.

Jim McMahon OBE MP
Minister of State for Local Government and English Devolution
2 Marsham Street
London SW1P 4DF

Maidstone Borough Council
Sevenoaks District Council
Tonbridge & Malling Borough Council
Tunbridge Wells Borough Council
c/o Tunbridge Wells Borough Council
Town Hall
Royal Tunbridge Wells
Kent TN1 1RS

Phone: 01892 554274
Ask for: William Benson
Email: william.benson@tunbridgewells.gov.uk

21 March 2025

Dear Minister of State,

Local Government Reorganisation in Kent

We are writing as the leaders of Maidstone, Sevenoaks, Tonbridge and Malling and Tunbridge Wells councils in response to your letter of 5 February in which you formally invited us to work with other council leaders in Kent to develop a proposal for local government reorganisation and in which you set out criteria and guidance for the proposal.

The criteria attached to your letter specifically requested likely options for the size and boundaries of new councils and indicative costs and efficiency saving opportunities.

We are pleased that Kent has been able to agree a single submission, but we have been unable to agree preferred (or even possible) geographical boundaries on a pan-county basis.

We are collectively concerned that we are in danger of spending large amounts of time, capacity and taxpayers' money on the development of 'competing bids', and your letter made clear that "*it is not in council taxpayers' interest to devote public funds and your valuable time and effort into the development of multiple proposals which unnecessarily fragment services [and] compete against one another*". A key lesson of previous LGR exercises where such competitive bids have been developed is that local leaders, staff and taxpayers have lamented the time spent on the production of detailed (and expensive) business cases and have subsequently wished that they had spent that time, money and effort on actually preparing for reorganisation and maximising the opportunities of new unitary structures. We therefore strongly encourage the Government to provide greater certainty about the criteria they have specified for determining the size and geography for new unitary councils and early feedback on the acceptability or otherwise of any options that fall outside of them.

We strongly believe that the emerging evidence clearly points to the best configuration for Kent as being three unitary councils based on the information set out in our supplementary submission. Specifically, we would note:

- Financial analysis suggests that, whilst a three-unitary model has the potential to save money, a four unitary model would result in an annual net additional cost (because of the additional implementation and disaggregation costs).
- The majority of partners we consulted support a three-unitary model (including health, police and fire), and some have noted that a four unitary model would result in additional costs for them.
- A three unitary model aligns most closely to other public sector geographies (health in particular) and would provide the greatest opportunities to deliver public sector reform and greater integration/preventative work with other public sector bodies.
- A three unitary model provides greatest scope for housing delivery (with any of the four unitary models, at least one proposed unitary would be affected in its ability to deliver housing by planning or other constraints).
- A three unitary model most comprehensively meets the criteria set out in your letter of 5 February – particularly in respect of population size, taxbase, resilience, value for money, opportunities for public sector reform and sustainability of key demand-led services.
- A three unitary model provides the least risk in terms of transition and implementation given the reduced requirement (and cost) of disaggregating services.

Our purpose in writing is to note that evidence suggests a three unitary model most closely aligns to the Government's criteria. We would be keen to maximise the time, effort and money being spent on reimagining, redesigning and implementing changes to local government rather than on developing costly business cases for competing models.

We will shortly be receiving the results of some work that has been commissioned from PwC which assesses various models against the Government's criteria. We would welcome the opportunity to engage with you as further evidence becomes available.

Yours sincerely,

[redacted]

Stuart Jeffery
Leader, Maidstone Borough Council

Roddy Hogarth
Leader, Sevenoaks District Council

Matt Boughton
Leader, Tonbridge & Malling Borough

Ben Chapelard
Leader, Tunbridge Wells Borough Council

DRAFT

Kent LGR Business Case: Option 3A

Contents

Foreword (placeholder)

Executive summary

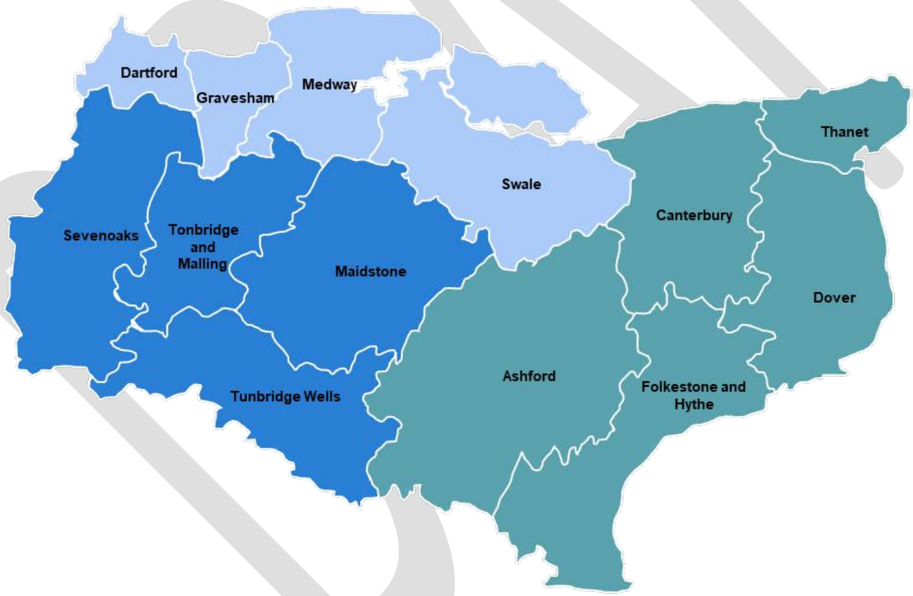
Introducing Option 3A

Supported by **[Councils to be inserted],** the Option 3A business case sets out a three-unitary model for the Local Government Reorganisation of Kent & Medway.

Option 3A meets each of the Government's criteria for reorganisation, and in doing so, has the greatest savings potential, lowest one-off implementation costs and shortest estimated payback period. It allows for strong local accountability and ensures services reflect community needs, whilst achieving economies of scale and supporting fiscal stability.

The 3A model offers broadly balanced populations which align to local identities and creates unitary councils with the capacity to deliver and meet the needs of changing populations.

This model has alignment and support from the county's largest public sector partners, strengthening opportunities for place-based service development alongside social and health care integration and transformation, and wider public service reform. The model will allow for pan-Kent service provision and limit the costs of other public sector partners by reducing their requirement to realign, and forms a strong basis for future devolution.



"From the point of view of how policing is organised in Kent, I believe that if local government re-organisation is required, it should be with three unitary authorities, built on the existing District council boundaries and Kent Police's Divisional structure."
Kent Police and Crime Commissioner

	North Kent	West Kent	East Kent
Population	686,716	567,062	677,906
Current council areas	• Dartford • Gravesham • Medway • Swale	• Maidstone • Sevenoaks • Tonbridge & Malling • Tunbridge Wells	• Ashford • Canterbury • Dover • Folkestone & Hythe • Thanet
	A strategically important logistics and infrastructure hub, North Kent will drive economic growth through its proximity to London, major transport corridors (M25, M2), and international gateways like Ebbsfleet and the Port of Sheerness. It will focus on clean growth, advanced manufacturing, and professional services, with a diverse population and strong urban regeneration potential.	A knowledge-driven region with a high-quality environment that is well placed to leverage its skilled workforce, heritage assets, and green infrastructure to attract investment in life sciences, creative industries, and professional services. It shares a strong sense of identity, economic, social, and transport links, making it a coherent unit for governance while preserving local representation.	A diverse coastal and rural economy anchored by major ports and education hubs, East Kent will be the Gateway to Europe. It will focus on regeneration, tourism, creative industries, and green energy, supported by high-speed rail and strategic transport links. The area's rich heritage and cultural assets will underpin place-based growth.

Purpose and approach (see section 1)

The reorganisation of local government presents a valuable opportunity to redesign a system that better serves the diverse needs of Kent and Medway's residents.

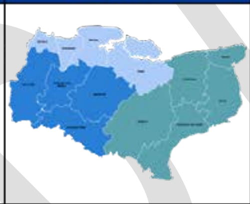
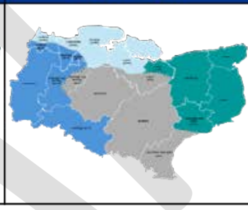
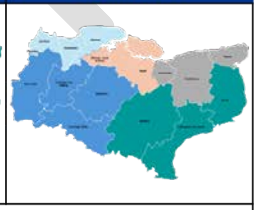
The 14 councils of Kent have collaborated to develop a model reflecting established population and economic centres as well as community and workplace patterns.

Through this joint effort, the councils have developed five business cases addressing the government's six reform criteria, proposing to replace the current two-tier system with more efficient and resilient unitary authorities.

These authorities aim to support devolution, enhance service delivery and strengthen community engagement.

Each proposal is underpinned by a shared evidence base, robust governance, transparent appraisal and extensive stakeholder and public consultation to form a united and evidence-led vision for the future of local government in Kent and Medway.

Of the five options considered, Option 3A is being put forward as the preferred proposal in this case.

	Option 1a	Option 3a	Option 4b	Option 4d	Option 5a
					
Approach to drafting	Kent County Council leading with some shared input around finance and services.	Common approach to drafting with input from councils.			
Structure, formatting and branding	Separate structure, formatting and branding.	Single approach to structure, formatting and branding across four business cases. A significant proportion of content across the four cases will be shared and clearly highlighted within the cases.			

The Kent context (see section 2)

Kent, located in the south east of England, is a geographically diverse and economically important area.

Known as the Garden of England and the UK's Gateway to Europe, it covers 3,739 sq. km with a population of about 1.93 million.

The county combines densely populated urban centres with extensive rural areas.

Its landscape includes the North Downs, The Weald, and a long coastline featuring the White Cliffs of Dover. Rivers like the Thames, Medway and Stour support trade and settlement.

Economically, Kent has evolved from its agricultural roots into a modern, mixed economy encompassing manufacturing, logistics, life sciences, tourism and digital industries.

Major assets include the Port of Dover, the Discovery Park science and technology hub and excellent transport links.

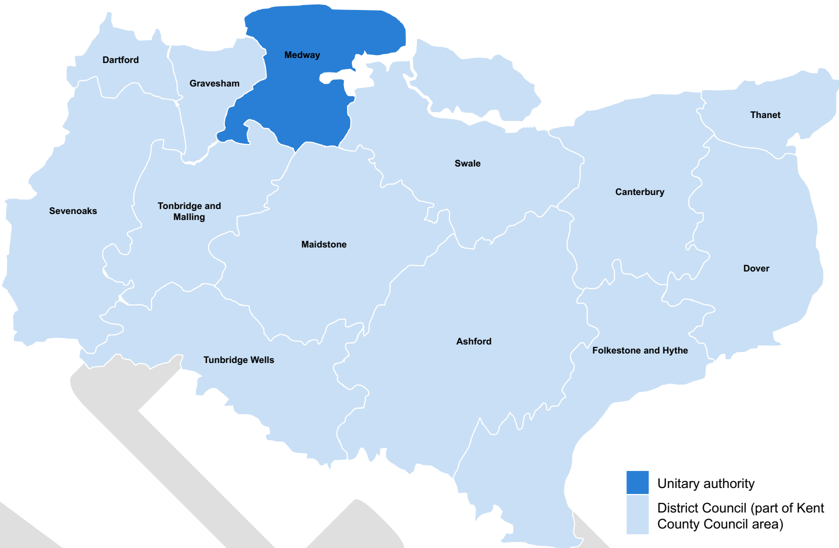
Kent's strategic location, skilled workforce and innovation hubs drive regional growth and support its case for devolution and local government reform.

Kent currently has a two-tier local government system.

At the upper tier is Kent County Council, while the lower tier consists of 12 district and borough councils.

Medway Council functions separately as a unitary authority.

In addition, there are more than 300 town and parish councils handling local-level services.



The current mixed model of service delivery creates complexity and all 14 councils recognise the potential benefits of moving towards a single-tier system with fewer organisations and a more unified governance structure.

Challenges and opportunities (see section 3)

Councils across the county face financial pressures and rising demand.

In Kent, key pressures include:

- uneven funding and tax bases
- escalating social care and border-related costs
- workforce shortages and morale issues
- fragmented governance across the two-tier system

Local Government Reorganisation (LGR) offers a unique opportunity to create a more efficient, resilient and sustainable model.

By simplifying structures and pursuing devolution, Kent can streamline service delivery, strengthen financial stability, enhance collaboration across sectors, attract investment and build a greater sense of place to ensure more cohesive, accountable and community focused local government services.

Vision and principles for Local Government Reorganisation (see section 4)

Our vision for local government in Kent is:

Better outcomes for Kent residents through financially-sustainable and accountable local public services delivered in partnership with communities.

LGR is the catalyst for transformation and reform, creating resilient, digitally-enabled councils rooted in local identity and strong partnerships.

It is crucial that devolution and LGR are linked: structural reform unlocks the powers, funding and flexibility needed to make decisions locally and drive growth.

Kent's ambition is to deliver better outcomes for all residents through sustainable, accountable and community-focused public services.

All councils in Kent are united in their support for devolving powers to a single strategic authority.

This will ensure decisions about Kent are made in Kent, by those who know its communities best.

LGR and devolution are intrinsically linked. To fully realise our vision, we need the powers, funding and countywide collaboration that only a devolution deal and a new strategic Kent authority can provide.

We are committed to securing a devolution deal for Kent at the earliest possible opportunity.

Option 3A creates three strong councils and strikes the right balance between resilience, financial stability, efficiency and local connection. Guided by shared principles of resident focus, collaboration, digital innovation, and strong leadership, this proposal sets out a clear framework for a more responsive, cohesive, and future-ready system.

The case for Option 3A (see section 5)

Option 3A delivers balanced populations whilst respecting existing borough and district boundaries. It delivers strong alignment to transport networks, travel-to-work areas, local identity and public service geographies. The proposed unitary councils have the scale to ensure efficient coordination, improve capacity and withstand financial shocks, ensuring sustainable service delivery across provision.

The model aligns closely with health, police and fire service boundaries, reducing fragmentation and improving opportunities for co-ordination, integration and collaboration for system wide transformation. It is supported by major public service partners both for the benefits to day-to-day operational co-ordination and the potential to further develop and reinforce partnership, place-based working and longer-term integration, shared funding and transformational change. It preserves local identity while strengthening governance and resilience and lays the foundation for devolution and public sector reform.

Option 3A creates a simplified, efficient and community-focussed single tier structure, capable of delivering sustainable services and economic growth, driving up living standards and enabling good health creation. It is the most efficient and least disruptive option for Kent, with lower transition costs, and a shorter payback period than other multi unitary options, while meeting population requirements of government.

Three unitary councils creates financially sustainable and democratically accountable authorities, with sufficient scale to provide core services and the flexibility to meet the needs of the local population.

Summarised below are the key arguments for why Option 3A is best for Kent.

Key theme	Arguments	Government Criteria
Financial viability and balanced growth	• Scale supports economic resilience, including the ability to absorb shocks in high-pressure services i.e. demand for social care. • Balances tax bases and supports fair council tax harmonisation for long-term financial stability. • Larger councils (567k–687k residents) deliver the optimal scale for resilience and efficiency. • Consolidation from fourteen councils to three removes duplication, simplifies governance, and maximises savings. • Three proposed councils have broadly balanced economic strength, tax bases, and Gross Value Added (GVA) per capita, supporting sustainable growth and resilience. • Economies of scale in procurement, staffing, IT, HR, and infrastructure reduce duplication. • Transformation and digital investment enabled by scale and capacity. • Simplified governance improves financial oversight and transparency, reducing risk of inefficiency. • Simplified structures support strong partnership across unitary areas to collaborate on strategic issues, enabling service delivery on a pan-Kent basis. • Avoids boundary changes, limiting disruption and extra cost, time and risk. • Strong fiscal starting positions and balanced populations ensure capacity to manage pressures and withstand shocks. • Offers the best value for money, with the highest savings, lowest transition costs, and quickest payback period.	Criteria 1, 2, 3
Local identity and community cohesion	• Proposed boundaries align with historic, cultural, and service geographies, preserving local identity and social cohesion across North, West and East Kent. • Recognisable community ties are maintained (e.g. Cinque Ports, coastal towns, market towns) supporting continuation of local traditions, civic institutions, and community networks. • Alignment with 'Travel to Work' areas supporting coherent economic geographies for housing, infrastructure, study patterns and labour markets. • Enables coordinated housing, transport, and infrastructure planning at a meaningful scale, with critical UK port of entry points contained within one council able to support communities effectively when disruption occurs.	Criteria 1, 3, 4, 6
Population, governance and democratic accountability	• Population densities vary logically (urban vs rural), allowing tailored service priorities (e.g. urban regeneration vs green infrastructure). • Streamlined governance structure strengthens ability to engage effectively at an appropriate scale with central government and regional bodies.	Criteria 1, 2, 3

	• Broadly balanced populations across unitary areas. • Councillor-to-elector ratios in line with ratios seen nationally through recent LGR programmes ensuring democratic accountability. • Well-developed governance arrangements and effective structural and policy measures that enhance neighbourhood and community engagement. • Ensures councillors and residents have meaningful influence over local services and priorities.	
Better, More Integrated Public Services	• Aligns boundaries with NHS, Police, transport, and travel to work / study areas to improve coordination and consistency. • Existing partnerships and shared services enhance capacity and reduce fragmentation, supporting public service reform. Services disrupted by LGR will be actively managed and adapted to maintain continuity and effectiveness. • Scale, capacity and alignment of place-based and people services to deliver prevention and complex reforms in social care. • Larger, strategically aligned councils can plan and deliver jointly on community safety, health, housing, and care. • Enhances data sharing, specialist capacity, and system-wide collaboration to tackle shared challenges across unitary areas. • Unites Dover, Folkestone and Ashford to provide for coherent oversight of the county's strategic road and rail entry ports.	Criteria 1, 3, 4
Platform for Devolution, Strategic Growth and Regional Priorities	• Balanced unitary authorities meet the population scale for effective devolution and efficient delivery. • Supports fair representation and joint decision-making within a future Mayoral Strategic Authority. • Provides sufficiently sized areas for strategic planning to meet priorities including housing targets, economic growth and supporting integration with preventative and integrated care.	Criteria 5

Implementation plan (see section 6)

Kent's LGR implementation plan aims to follow a phased and collaborative approach across all councils, leveraging a well-established shared programme with strong governance and joint planning.

The process is structured into preparation, foundational, shadow authority, officer leadership and go-live phases, each with clear priorities to ensure a smooth transition while driving ambitious public service reform alongside devolution.

The programme builds on Kent's history of joint working and lessons from previous LGR efforts, supported by targeted governance, workstreams and stakeholder engagement to mitigate risks related to service disaggregation, aggregation, ICT and working together, aiming for a seamless, efficient transition that benefits residents and public services over the long-term.

Options appraisal (see Appendix 1)

A rigorous and collaborative process undertaken by the 14 Kent local authorities to appraise potential council governance options. The aim was to provide a robust, consistent, and evidence-based foundation to support local decision-making on which options should advance to full business case development.

The appraisal followed national guidance and was aligned with the Government's six criteria for local government reorganisation, as set out in correspondence from the Secretary of State in February and June 2025. Importantly, the process did not rank or recommend any preferred option but provided a shared evidence base to inform council decisions.

Key stages of the appraisal process:

Selection of options

A longlist of ten potential unitary options was developed based on past work, stakeholder input, and strategic discussions.

After joint engagement, three options were removed from consideration, resulting in a shortlist of seven options for detailed appraisal.

Data collection and modelling

Comprehensive datasets were compiled from public sources and council submissions.

For options involving boundary changes, additional modelling (e.g. using LSOA-level data) ensured accuracy and comparability across new configurations.

Development of evaluation criteria

Fourteen criteria were developed in line with the Government's six LGR tests.

Each criterion included specific metrics and clear definitions of "what good looks like" to enable consistent evaluation across options.

Scoring methodology

A standard three-point scale (High, Medium, Low) was applied to each metric, primarily based on balance across proposed authorities.

No weighting was applied; all criteria were treated equally.

Where appropriate, nuanced scoring (e.g. Medium/High) or bespoke approaches were used for single-unitary scenarios.

Assessment and presentation of results

Each option was scored across all metrics, and results were summarised through visual dashboards and narrative commentary.

Special consideration was given to ensure comparability for unique configurations, such as a single-county unitary authority.

Council Leaders reviewed the appraisal findings, supported by resident and stakeholder views. While the appraisal did not determine a preferred option, it served as an objective and structured basis for informed political judgement and democratic decision-making on which options should proceed to business case development.

Financial modelling (see Appendix 2)

Finance officers across all 14 Kent councils have reviewed and adjusted the financial modelling in order to provide a single financial assessment of models for inclusion in proposals to government.

The key driver of difference between options are the number of councils being proposed.

Due to the assumptions applied within the modelling, implementation costs and recurring costs of disaggregation increase as the number of councils proposed increases.

The headline numbers for Option 3A are set out below:

LGR option	Implementation costs (one-off) (£m)	Reorganisation savings (gross) (£m)	Disaggregation costs (£m)*	Recurring annual revenue savings (£m)**	Estimated payback period
Option 3A	(127.8)	69.4	(19.7) - (29.2)	40.2 - 49.7	5.4 – 6.7 years

**A range has been applied specifically for disaggregation costs following collaborative discussions around different scenarios for the impact of LGR on commissioned spend across adult and children's social care.*

***Recurring revenue savings = gross reorganisation savings less disaggregation costs*

The three-unitary option is the proposal which offers best value, with the highest savings, lowest transition costs, and quickest payback period. This model supports larger taxbases and, in line with the financial modelling, requires lower disaggregation and transition costs while offering greater opportunities for economies of scale.

Of all the options being considered, 3A provides the most balanced population distribution, promoting resilience and strategic capacity. Each authority is sized to efficiently deliver services, withstand financial pressures, and invest in transformation, while remaining closely connected to local communities. The model also avoids boundary changes, which would inevitably be associated with increased costs, risk and complexity.

The model is designed to absorb future shocks and manage demand in high-pressure services such as adult social care and children's services and has the potential to support strengthened integration and partnership working across public sector services developing innovative and coordinated responses to areas such as homelessness.

Alignment with partner structures supports public service reform and provides a firm basis for future devolution.

"…our preference would be for the smallest number of unitary councils to minimise infrastructure costs and the risk of fragmenting services."
NHS Kent and Medway

Data sources (see Appendix 3)

A common data set was used for all analyses presented in this case.

Details of the data set including its source, structure and variables, are provided in Appendix 3.

Section 1: Purpose and approach

This section includes:

Purpose of the business case

A collaborative approach across all Kent councils

Purpose of the business case

Responding to the Government's request

On 5 February, the Minister for Local Government and English Devolution, wrote to all leaders within Kent inviting them to submit options for Local Government Reorganisation (LGR).

The letter reiterated the government's ambition to see the current two-tier system replaced with larger unitary authorities that are better able to deliver services, support economic growth and operate effectively within a Mayoral Strategic Authority (MSA).

The government's letter set out six criteria for successful LGR which informs the structure and content of business cases submitted by Kent councils.

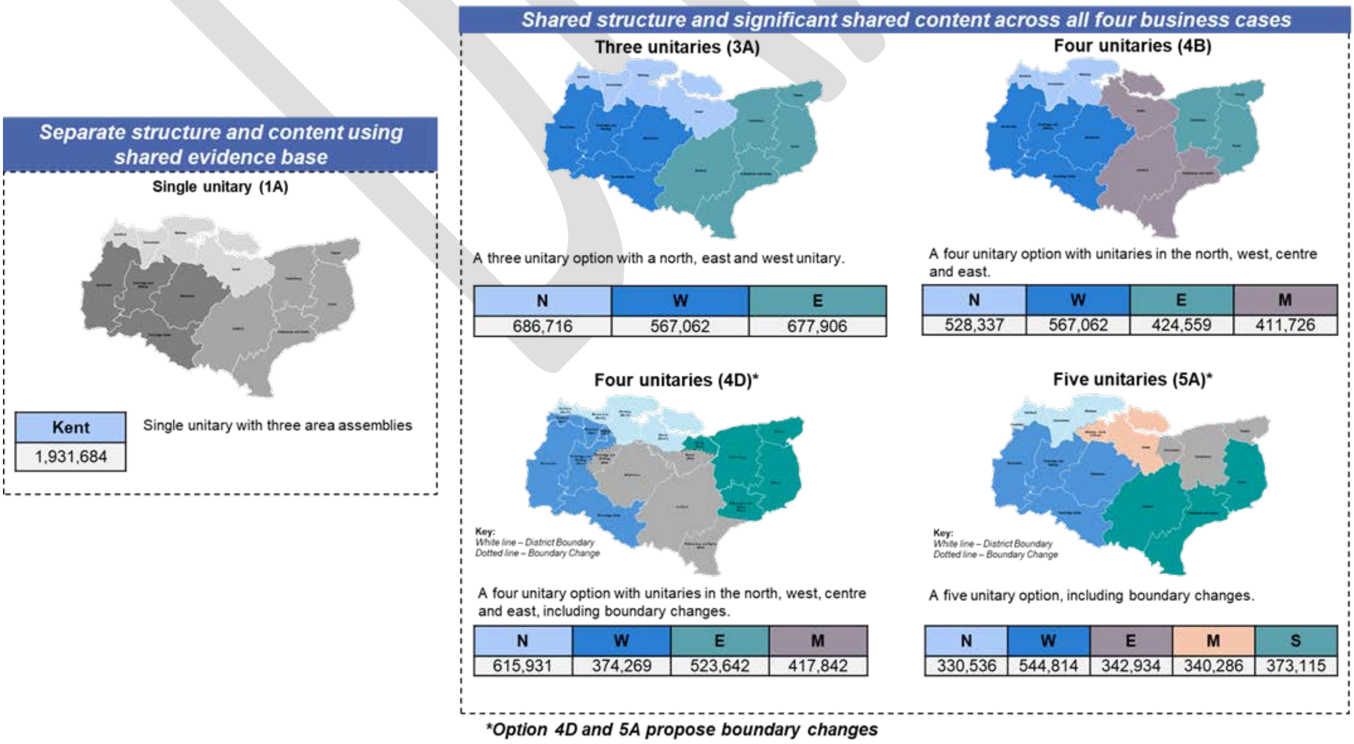
1. Establishing a single tier of local government
2. Efficiency, capacity and resilience to shocks
3. High-quality, sustainable public services
4. Collaboration to meet local needs
5. Enabling devolution
6. Strengthening community engagement and neighbourhood empowerment

Five business cases across Kent

This document is one of five business cases developed across Kent as part of a coordinated programme involving the 14 local councils.

Each business case draws on a shared evidence base, ensuring consistency and a common understanding of the context, challenges and opportunities for public sector reform.

Figure 1: *The five business cases*



Option 1A has been developed by Kent County Council with a structure which varies from the other four cases.

The narrative for the 1A case has not been shared here but the supporting evidence base used is the same.

The other four business cases follow a standard structure aligned with government criteria.

Each document contains a significant amount of shared content as well as option-specific elements. That shared content is clearly marked throughout the documents.

Content that is all or primarily shared across the four cases includes:

- **Section 1:** Purpose and approach
- **Section 2:** The Kent context
- **Section 3:** Challenges and opportunities
- **Section 4:** Vision and principles for Local Government Reorganisation
- **Section 5:** Case for change
    - **Criteria 5:** Supporting strategic devolution and regional priorities
    - **Criteria 6:** Enabling stronger community engagement
- **Section 6:** Implementation plan
- **Appendix 1:** Options appraisal
- **Appendix 2:** Financial modelling
- **Appendix 3:** Key data sources

The case for change (section 5) makes up a significant proportion of the proposal.

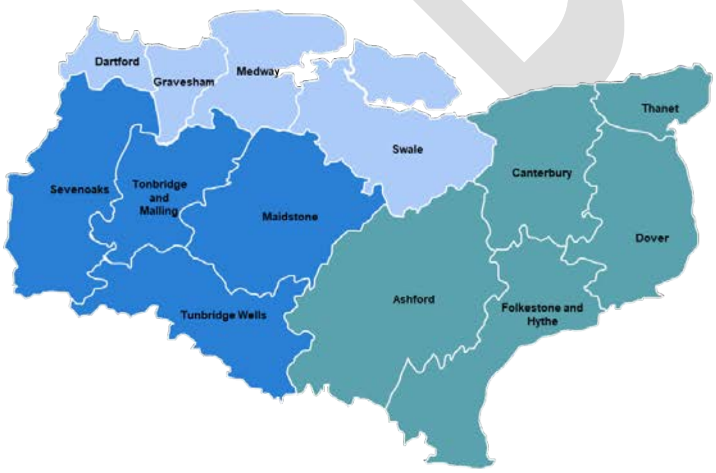
Within this section the majority of content is option specific, with some shared elements.

The case for change provides a clear and evidence-based narrative for why the proposed model is the most effective option for LGR in Kent.

Business case for Option 3A

This proposal presents a recommended three-unitary model (Option 3A) for the future of local government in Kent. In response to the Government's letter and subsequent feedback, it sets out a clear case for why this model is best aligned with the Government's six criteria for reform.

***Figure 2**: Population across Option 3A*



Unitary	Areas	Population
North	Dartford, Gravesham, Medway, Swale	686,716
West	Sevenoaks, Tonbridge & Malling, Tunbridge Wells, Maidstone	567,062
East	Ashford, Canterbury, Dover, Thanet, Folkestone & Hythe	677,906

This option is supported by **[Councils to be inserted].** Key factors for putting forward this specific geography are:

- **Economic viability and balanced growth:** Creates three balanced and coherent councils with the scale, efficiency, and strategic focus to plan for growth and deliver sustainable services. Avoids boundary changes, reducing disruption and supporting integrated delivery.
- **Local identity and community cohesion:** Respects local identities and existing historic, cultural and service boundaries while providing a strong foundation for future coordinated planning and community engagement.
- **Population, governance and democratic accountability:** Forms councils with balanced populations as well as streamlined and effective governance structures.
- **Better, more integrated public services:** Simplifies partnership working, with each unitary aligned to one Kent Police area and one NHS HCP team, reducing complexity, cost, and delay. Establishes congruent geographies that enable integrated, whole-system models, creating greater opportunities for prevention and delivering improved quality of life and financial outcomes.
- **Platform for devolution, strategic growth and regional priorities:** Provides sufficiently sized unitary areas that support equitable representation and enable effective alignment across government strategic priorities.

Note: For the purposes of proposals to Government, future council names are referred to geographically (e.g. as 'East Kent'). These are holding names which are subject to change following confirmation of the option to be implemented.

A collaborative approach across all Kent councils

All Kent councils have prioritised working together, sharing information and full transparency throughout the LGR process. While five business cases are being submitted, we have minimised duplication and continually emphasised what we agree on over our differing views on specific council geographies.

Building on strong relationships

The Kent LGR governance framework is firmly rooted in established joint working among the 14 councils across Kent.

This longstanding tradition of partnership underpins every stage of the LGR process, ensuring inclusive and coordinated decision-making.

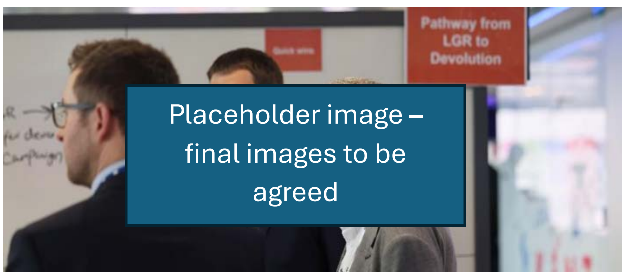
Our governance structure includes several key components:

- **Programme Board:** comprising the 14 Chief Executives, this board meets weekly to oversee progress, maintain strategic alignment and address emerging challenges across all councils.
- **Steering Group:** a smaller group of Chief Executives, Directors and Finance officers convene weekly to provide focused guidance on the development of the business cases, ensuring thorough evaluation and robust planning for reorganisation.
- **Leaders' meetings:** Held monthly, these sessions bring together Council Leaders to discuss and reach consensus on decisions, represent the voices of their communities and ensure residents' interests remain central throughout the process.
- **Kent Finance Officer Group (KFOG):** All 14 Kent Finance Officers (S151s) across Kent have held regular meetings and worked together on all LGR related matters, including meeting on a weekly basis to review and challenge financial modelling.

We take pride in the collaborative spirit that has been sustained throughout the options appraisal and the development of multiple business cases.

This collective approach not only strengthens governance but also builds confidence among all stakeholders that decisions are made with shared commitment and mutual respect.

Importantly, this strong foundation will continue to serve us well beyond the decision point and the making of the Structural Changes Order, preparation for the shadow authorities and into the establishment of the successor authorities.



Options appraisal process

The options appraisal was designed to provide a structured, evidence-based assessment of potential unitary options for Kent, helping to identify the options that should proceed to full business case development.

The approach included the following key steps:

1. **Option selection**: an initial longlist of 10 options was developed based on previous analysis submitted to government and local discussions regarding potential options. Through political engagement across Council Leaders, this was refined to a shortlist of seven options for full appraisal.

2. **Data collection and modelling**: data was gathered from publicly-available sources and direct council submissions which was used to model the potential structure and characteristics of each option, including assumptions where boundary changes were involved.

3. **Evaluation framework**: 14 evaluation criteria were developed, aligned to the government's six LGR criteria. For each criterion, specific metrics and definitions of "what good looks like" were agreed to enable consistent assessment.

4. **Scoring methodology**: each metric was assessed using a three-point scale (high, medium, low), based primarily on balance or distribution across proposed new councils. Additional guidance was applied where balance was not a relevant factor.

5. **Assessment process**: all options were scored against all metrics with results presented in dashboards and supported by narrative commentary. The output was comparative, assessing how each option performs relative to other options assessed rather than determining if an option is objectively good or bad. No weighting was applied and the appraisal did not rank or recommend a preferred option.

Following the completion of the appraisal, Council Leaders met to consider the results alongside the views of their own councils and communities.

At this meeting, they agreed on a set of preferred options to proceed to the next stage, recognising both the evidence from the appraisal and the broader political and public context.

This consistent and transparent methodology ensured a shared evidence base to inform this proposal.

Appendix 1 of this document outlines the step-by-step process, evaluation criteria and scoring methodology in detail for the options appraisal exercise.

Stakeholder and public engagement

To ensure local voices have been central to the process, a coordinated, countywide programme of public and stakeholder engagement was carried out between 8 September and 6 October 2025.

This proactive engagement aligned with MHCLG guidance and reflected Kent's political commitment to meaningful community involvement.

A standardised resident survey, agreed across all 14 councils, captured views on local identity, service expectations and future priorities.

Alongside this, a joint stakeholder programme involved talking to key organisations across sectors, with each council engaging its local networks including residents, town and parish councils, voluntary groups and businesses.

Insights from both the survey and stakeholder discussions have directly informed the development of the business case and continue to guide local decision-making. Further details can be found in **Section 5, Criteria 4**.

Section 2: The Kent context

This section includes:

Overview of Kent: geography, population, economy

Existing local government structures

Partnership landscape

Overview of Kent: geography, population, economy context

Kent is a diverse and strategically-located county in the south east of England and serves as the UK's gateway to continental Europe. 'Kent' is used to describe the geographical area covered by Kent County Council, Medway Unitary Council and all 12 district councils. The county features a mix of urban and rural settlements such as the Weald and Romney Marsh spread across a large geographic expanse. Kent has a population of approximately 1.9 million with a varied demographic profile. The economy includes key sectors such as construction, life sciences, agriculture, manufacturing, logistics and tourism, supported by major transport links including ports, motorways and railways with high-speed routes into London. The county's geography encompasses coastline, countryside, including national landscapes, and historic towns and villages, contributing to its unique regional identity.

Figure 3: *Map of Kent*

Kent geography

Kent is a geographically diverse and economically significant county in the south east corner of England, often referred to as the UK's gateway to continental Europe.

It borders Greater London to the north west, Surrey and East Sussex to the west and south west, and is flanked by the Thames Estuary, the North Sea, the Strait of Dover and the English Channel.

This strategic location, coupled with major transport infrastructure, positions Kent as a vital hub for national and international trade and connectivity.

Covering approximately 3,739 sq. km, the county is home to around 1.93 million people, distributed across a varied landscape of urban and rural settlements.

High-density urban centres such as Medway, Dartford and Thanet (with more than 1,300 people per sq. km) contrast with more sparsely populated, rural districts like Sevenoaks and Ashford, reflecting a population profile in which 73.9% live in urban areas and 26.1% in rural communities.

The county's physical geography is marked by several distinct features.

The North Downs, a prominent chalk ridge, runs west to east through the county.

To the south, The Weald offers rolling, wooded terrain shaped by clay and sandstone.

Kent's extensive and evolving coastline, from the iconic white cliffs of Dover and Thanet to the low-lying landscapes of Romney Marsh and the shingle headland of Dungeness, continues to be shaped by erosion, sedimentation and land reclamation.

Situated in north Kent, Medway forms one of the county's most significant urban areas defined by its estuarine setting and close proximity to London.

Principal rivers such as the Medway and the Stour help define the county's natural geography.

The Medway, in particular, has long served as a vital route for trade and transport, linking inland settlements with the Thames and the North Sea.

Economically, Kent balances its rural heritage with increasing urbanisation and diversification.

Historically celebrated as the Garden of England for its orchards, hop gardens and fertile farmland, agriculture remains a cultural hallmark even as its economic influence has declined.

The region's rich heritage is a significant asset, reflected in its array of listed buildings, historic landmarks and world-renowned sites such as Canterbury Cathedral, Dover Castle, The Historic Dockyard Chatham and the Archbishop's Palace in Maidstone.

These heritage features not only reinforce the county's cultural identity but also enhance its attractiveness as a destination for visitors and investment.

In recent decades, the county's economy has shifted towards manufacturing, logistics, retail, tourism and life sciences, anchored by major hubs such as Discovery Park, Kent Science Park, and the North Kent Enterprise Zone.

This expanding economic base is supported by strong transport links including the ports of Dover and Sheerness, the M2 and M20 motorways and international high-speed rail connections.

This combination of rich natural assets, historic identity and modern infrastructure underpins Kent's evolving role and capacity to deliver sustainable growth within the regional and national economy.

Table 1: *Population and geography data for Kent*

Council area	Population (mid-2024)[1]	Geography (sq.km)[2]	Population density[3]
Medway	292,655	193.7	1,510.7
Ashford	140,936	580.6	242.7
Canterbury	162,100	308.7	525.0
Dartford	125,011	72.7	1,718.8
Dover	119,768	315.4	379.8
Folkestone and Hythe	112,411	356.9	315.0
Gravesham	110,671	99.0	1,118.0
Maidstone	187,767	393.3	477.4
Sevenoaks	122,748	370.3	331.5
Swale	158,379	373.4	424.1
Thanet	142,691	103.6	1,377.2
Tonbridge and Malling	136,853	240.1	569.9
Tunbridge Wells	119,694	331.3	361.3
Total	**1,931,684**	3,739.2	516.6

Kent population

Kent has a population of approximately 1.9 million, making it one of the largest counties in England by population.

The demographic profile of the county is varied and reflects significant differences in age structure, ethnicity and population growth trends across its 13 council areas.

Kent's population includes a balanced mix of age groups but with distinct patterns across the county.[4]

- Children and young people (0–19 years) make up around 22% of the population. The largest numbers are found in Medway (75,236), Swale (38,217), and Maidstone (44,943).

- Working-age adults (20–64 years) represent the majority of the population at around 59%. Medway (169,350), Maidstone (107,212), and Canterbury (88,840) have the largest working-age populations, reflecting their roles as employment and commuter hubs.

- Older people (65+ years) comprise approximately 19% of Kent's population. Coastal and rural districts such as Canterbury (36,194), Dover (29,736), and Folkestone & Hythe (28,903) have proportionately larger older populations, highlighting the appeal of these areas for retirement and the resulting demand for health and social care services.

Compared to the national average, Kent has a slightly higher proportion of older residents, particularly in its coastal communities, while areas closer to London, such as Dartford and Gravesham, are experiencing population growth among younger and working-age adults due to ongoing housing development and improved transport links.

---

[1] https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/estimatesofthepopulationforenglandandwales

[2] https://geoportal.statistics.gov.uk/datasets/da8590c5f55f4664b32ad4339f43419c/about

[3] https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/estimatesofthepopulationforenglandandwales

[4] https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/estimatesofthepopulationforenglandandwales

Kent continues to see strong population growth, driven by both internal migration from other parts of the UK and international migration.

The availability of more affordable housing, good transport connectivity and lifestyle factors attract young families, professionals and retirees alike.

Inland districts such as Ashford and Maidstone have experienced significant growth through planned housing developments, while urban centres such as Gravesham and Dartford are seeing demographic change shaped by proximity to London and regeneration schemes.

Kent remains a predominantly White British county with 83.2% of residents identifying as such.

However, the population is becoming increasingly diverse.

Minority ethnic groups now represent 16.8% of the total population with Asian communities being the largest minority group making up 4.4% of the population.

Ethnic diversity is most pronounced in urban areas and towns close to London.[5]

Gravesham has nearly one in three residents identifying as non-White British and is home to one of Europe's largest Sikh Gurdwaras.

In Dartford, 52% of school-age children are now classified as non-White British, highlighting generational change.

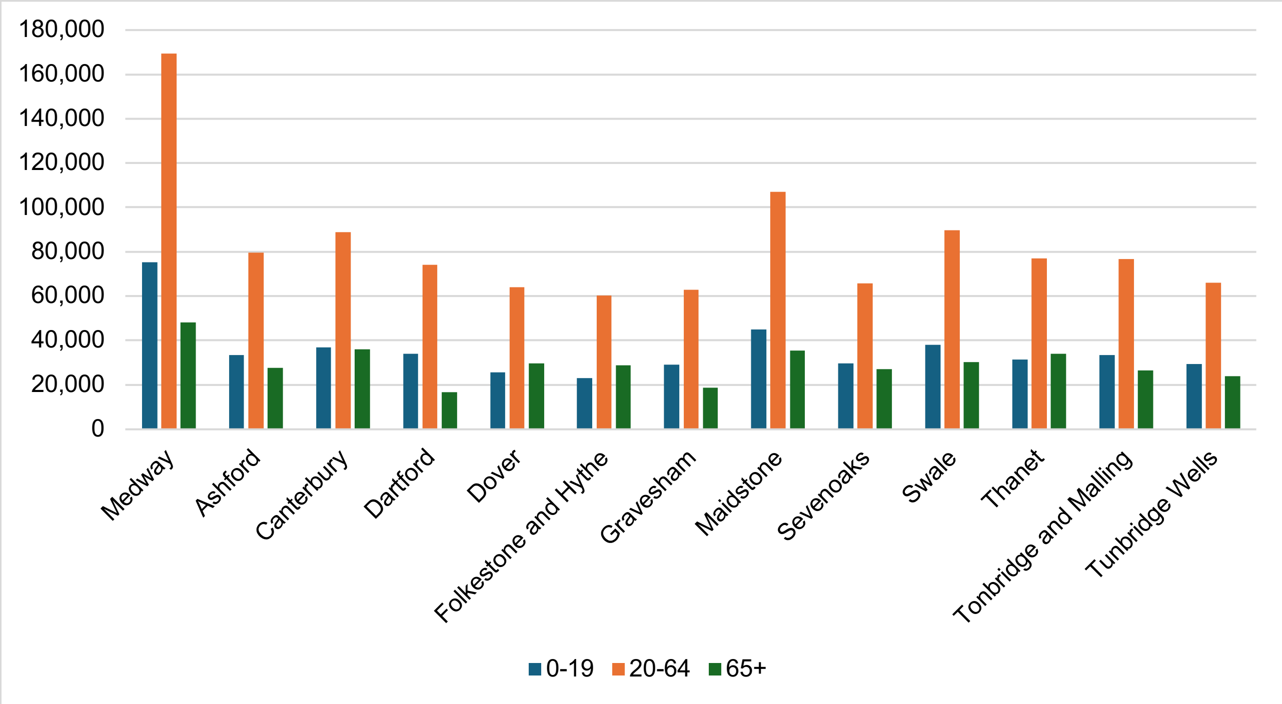
Elsewhere, local factors shape distinct community profiles: Maidstone and Folkestone and Hythe have significant Nepalese communities linked to the nearby barracks and the Gurkha regiment, alongside a growing Eastern European population.

Together, these patterns reveal a complex and locally-varied picture of diversity across Kent.

Figure 4: *Population across Kent (mid-2024)*[6]

[5] https://www.kent.gov.uk/about-the-council/information-and-data/facts-and-figures-about-kent/summary-of-kent-facts-and-figures/people

[6] https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/estimatesofthepopulationforenglandandwales



Kent economy

Kent is a dynamic and strategically-important region, often referred to as the UK's Gateway to Europe.

Located in the south east and bordering London, it plays a vital role in national trade, economic growth and innovation.

It is home to thriving sectors including agriculture, logistics, advanced manufacturing, food and drink, life sciences, tourism and the creative and digital industries.

Annual trade through the Port of Dover exceeds £122 billion[7], underscoring Kent's importance as a national and international logistics hub.

Kent is also a centre for innovation. Discovery Park in Sandwich, one of the UK's leading science parks, contributes an estimated £324 million[8] annually to the UK economy through its cluster of life sciences and technology businesses.

Other major business clusters include Kent Science Park in Sittingbourne, Kings Hill in West Malling and Innovation Park Medway, each providing high-value jobs and fostering collaboration with universities and research institutions.

The county's growing network of business parks, enterprise zones and research institutions further strengthens its innovation ecosystem.

[7] https://www.locateinkent.com/why-kent/kent-economy/
[8] https://www.insidermedia.com/news/south-east/kents-discovery-park-provides-324m-of-value-to-uk-economy

Kent's economic vibrancy is matched by strong civic leadership. The Kent and Medway Economic Partnership (KMEP) drives the region's long-term growth strategy, focused on infrastructure, innovation, skills, productivity and the ambition for inclusive prosperity.[9]

Housing and construction are fundamental to Kent's economic vitality, not only by generating significant employment within the sector but also by directly contributing to the government's national target of 1.5 million new homes this parliament[10].

This ambition is intrinsically linked to broader economic growth, as new housing and infrastructure projects stimulate productivity and prosperity, aligning with initiatives like the Kent and Medway Growth Deal.

While the industry faces challenges such as skill shortages and past insolvencies, Kent's specific demographic and economic projections underscore the critical need to strategically plan for and support continued growth in housing and infrastructure to meet future demands.

With excellent transport links to London and mainland Europe, a high quality of life and a strong track record in regeneration and investment, Kent continues to attract residents, businesses and investors.

As the UK's primary trade gateway to the continent, Kent is well-positioned to drive forward regional and national economic priorities.

These strengths also make Kent a compelling candidate for a future devolution deal, enabling greater local control to unlock further growth, tailor investment and deliver on long-term ambitions for the region.

[9] https://www.kmep.org.uk/

[10] https://questions-statements.parliament.uk/written-statements/detail/2024-07-30/hcws48

Current local government structures

All 14 councils across Kent and Medway recognise the opportunities that arise from moving towards a standardised single tier of local government with significantly fewer separate organisations, each with their own elected members, leadership and governance.

Kent currently operates under a two-tier local government system comprising Kent County Council as the upper-tier authority, 12 district and borough councils and one separate unitary authority, Medway Council, which operates independently of the county structure.

Additionally, more than 300 town and parish councils take responsibility for delivery at a more local level.

Figure 5: *Current boundary lines in Kent*

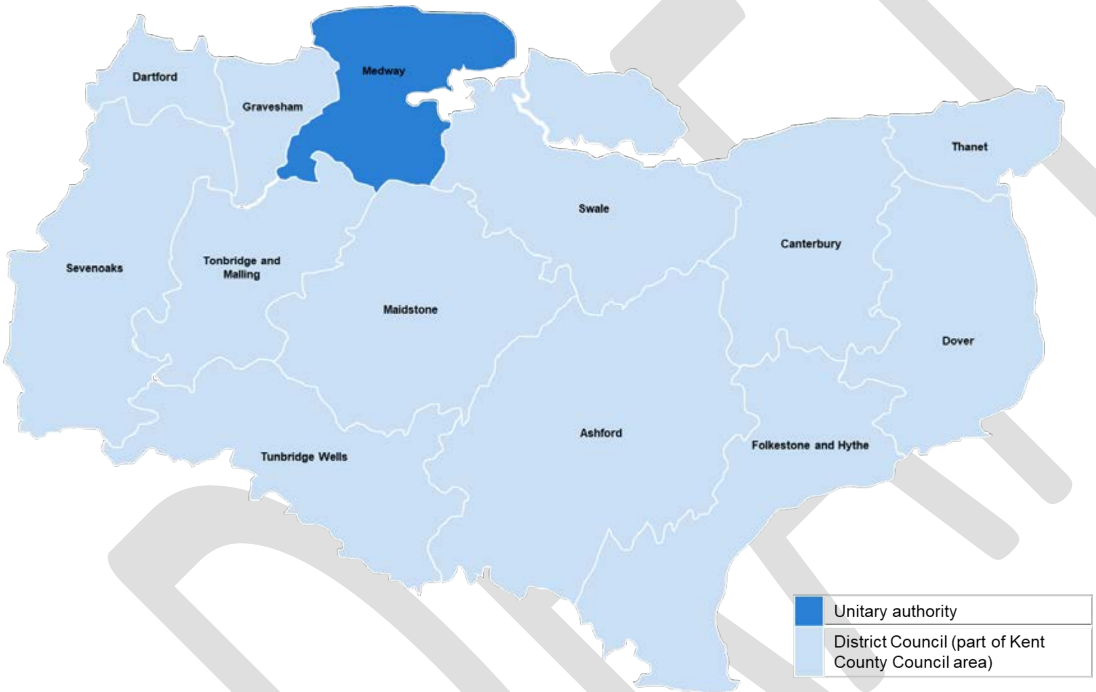


Table 2: *Characteristics of areas in current boundary lines*

Council	Population (mid-2024)[11]	Geography (sq.km)[12]	Councillors	Net Revenue Budget (£m)[13]
Medway	292,655	193.72	59	346,727
Ashford	140,936	580.64	47	26,710
Canterbury	162,100	308.74	39	23,580
Dartford	125,011	72.73	42	29,009
Dover	119,768	315.35	32	28,274
Folkestone and Hythe	112,411	356.91	30	22,886
Gravesham	110,671	98.99	39	17,943
Maidstone	187,767	393.34	49	28,323

[11] https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/estimatesofthepopulationforenglandandwales

[12] https://geoportal.statistics.gov.uk/datasets/da8590c5f55f4664b32ad4339f43419c/about

[13] FY2025/26 data received from KFOG

Sevenoaks	122,748	370.34	54	21,978
Swale	158,379	373.44	47	30,335
Thanet	142,691	103.61	56	21,979
Tonbridge and Malling	136,853	240.12	44	22,521
Tunbridge Wells	119,694	331.29	39	17,909
Kent County Council	1,931,684	3,739.22	81	1,698,857
Total	**1,931,684**	**3,739.22**	**658**	**2,337,031**

The current mixed model of service delivery presents ongoing challenges for strategic coordination, financial sustainability and service reform.

In two-tier areas, district councils are responsible for services such as planning, housing, waste collection and leisure while Kent County Council oversees county-wide functions including adult social care, children's services, public health, education, highways, waste disposal and libraries.

By contrast, Medway Council, as a unitary authority, delivers the full range of local government services directly.

The complexity of this system can result in lack of alignment, duplication, inefficiencies and inconsistencies in service provision, making it harder to respond effectively to cross-cutting challenges and to plan strategically at scale.

All 14 councils across Kent recognise the opportunities that arise from moving towards a standardised single tier of local government with significantly fewer separate organisations, each with their own elected members, leadership and governance.

Further details on challenges and opportunities can be found in **Section 3.**

The councils also recognise the need for a strategic authority to enable effective planning for sustainable economic growth.

It is essential preparations for this are dovetailed with the preparations and implementation of unitary local government across the Kent geography to avoid the need and additional cost and complexity of two phases of organisational change.

Partnership landscape

Local Government Reorganisation presents an opportunity to further strengthen joint working across the public sector and support partners in addressing long-standing challenges more effectively.

Across Kent, there is an established culture of joint working between Councils and a wide range of public sector organisations including Kent Police, the Police and Crime Commissioner (PCC), Kent Fire and Rescue Service, the Department for Work and Pensions (DWP), the NHS and colleges and universities.

These partnerships provide a strong foundation for taking forward a more integrated and system-wide approach to service delivery.

There is a complete, coterminous boundary for all public sector bodies within the Kent and Medway area, the importance of which is set out in the government's white paper on devolution..

Table 3: *Key partners across Kent*

Key partners	Description
NHS Kent and Medway	Provides healthcare services across Kent and Medway. It oversees hospitals, GP practices, community and mental health support as well as and public health programs for the region's 1.9 million residents, ensuring accessible and high-quality care throughout both urban and rural communities. Sub county collaboration is achieved through distinct Health and Care Partnerships the geography of which is broadly reflective of local health economies.
Kent Fire and Rescue Services	Operates across Kent and Medway, delivering emergency response, fire prevention, and safety education. The service protects people, property and the environment by responding to fires, road traffic collisions, rescues and other critical incidents while promoting safety through community outreach.
Kent Police and PCC	Responsible for law enforcement and public safety across Kent and Medway. Kent Police handle crime prevention, investigation and emergency response while the PCC sets policing priorities, manages budgets and ensures the force remains accountable to the public. Service delivery comprises both pan Kent (and Essex) specialist activities with operational policing based on local divisions. Borough commands collaborate with partners in community safety partnerships to address crime and disorder challenge aligned to local needs and priorities.

Through early engagement with partners during the interim submission phase, a number of consistent themes emerged.

Stakeholders expressed a clear desire to be involved meaningfully in shaping the future of local government and recognised the potential of reorganisation to enable improvements in service quality and outcomes for the public including through greater alignment of public services, driving efficiency and enhancing preventative approaches.

Partners emphasised the importance of maintaining stability in frontline services, particularly in health and social care, through any period of transition.

Our Kent partners have also consistently supported devolution for Kent and recognise the importance of securing a devolution deal alongside and at the same time as delivering LGR.

Feedback gathered through a range of existing forums, including strategic partnerships, parish networks, business improvement districts (BIDs) and sector-specific meetings, highlighted the need to ensure any future model supports delivery at the right geographic level.

The importance of sustaining local identity, improving responsiveness to community needs and maximising public sector investment were also key messages.

Engagement with staff and elected members across Kent councils has highlighted several practical considerations including concerns about uncertainty, capacity and skills shortages, challenges that LGR could help to address through more streamlined structures and clearer career pathways.

Nonetheless, careful change management will be essential to support staff through any transition.

The feedback from the interim engagement phase has directly informed the development of LGR proposals.

All models seek to build on existing partnerships, promote more joined-up decision-making and integrated service delivery, reduce silo working and ensure future structures are fit for purpose, both in meeting local needs and supporting strategic collaboration across the public sector.

They also provide a strong foundation for potential devolution arrangements, including the opportunity to pursue a Mayoral Strategic Authority where appropriate, aligning local governance with long-term ambitions for greater powers and funding.

Section 3: Challenges and opportunities

This section includes:

Key challenges to be addressed by Kent Councils

Opportunities through local government reorganisation

Key challenges to be addressed by councils across Kent

The government's White Paper highlights the challenges facing local government – challenges that are strongly felt in Kent. Maintaining the status quo is not a viable option and has been discounted due to the urgency and scale of the pressures on the current system and the need for structural reform to enable long-term sustainability.

Local government in Kent is under growing pressure from financial constraints and rising demand for services. There is also a need for structural reform: the current two-tier system, comprising Kent County Council, Medway Council and 12 district councils has inbuilt duplication and inefficiency impacting service delivery, governance, workforce stability and community representation.

These issues are compounded by the county's unique geographic and demographic context.

Kent's financial landscape mirrors national challenges but is intensified by its strategic position and diverse councils.

Wide variation in council debt levels, taxbase strength and income capacity creates uneven financial baselines and sustainability risks.

Higher border-related costs present operational challenges to the county further straining the system.

Protecting existing government investment and identifying a more resilient model is essential.

Below is a summary of the key challenges for Kent, relevant to any future model.

Table 4: *Challenges for Kent*

Funding & financial	• Persistent financial constraints and the challenge of fair funding, especially when all councils are seeking additional resources. • Rising social care costs, which threaten to consume budgets at the expense of other vital services. • Managing the distribution of debt and services during disaggregation. • Equalising tax bases and service levels across diverse areas ("levelling up, not down"). • Ensuring financial resilience in the face of uncertainty and change. • Significant variation in financial viability across councils. • Risk of councils being unable to meet rising demand in adult social care, children's services, school transport, homelessness and contract inflation. • High and unpredictable costs linked to Kent's role in managing border and asylum-related responsibilities. • Unequal Council Tax rates, taxbase strength and income-generating capacity across councils.

	• Risk of losing central government investment in coastal regeneration, public health, infrastructure and border-related services during transition.
Workforce	• Recruitment and retention difficulties, particularly for social care roles and in areas close to London. • An ageing workforce with the risk of significant staff losses. • Uncertainty and anxiety among staff during restructuring and transition. • Cultural differences between councils, making it hard to realise opportunities and harmonise working practices. • Staff morale and concerns about job security.
Structure & governance	• Fragmentation and disaggregation of services leading to inefficiencies and duplication. • Siloed approaches between upper and lower tiers of government. • Strategic misalignment and lack of clarity in roles and responsibilities, both internally and for residents. • Loss of identity for town and parish councils and the erosion of local democracy due to fewer councillors. • Branding and image challenges for local government. • Systemic complexity, overlapping responsibilities and inconsistent service delivery across Kent's 14 councils.
Community & identity	• Maintaining local character and identity amid large-scale restructuring and in future geographies for successor authorities. • Ensuring continuity and quality of services for diverse and geographically dispersed communities. • Meeting the needs of communities with different priorities and expectations. • Addressing the risk that smaller voluntary and community sector organisations may not survive the transition. • Variation in identity, demographics and economic conditions making consistent representation and service access more difficult.
Service delivery	• Protecting and enhancing key services (adults, children, SEND, homelessness) while managing demand and costs. • Ensuring continuity of services during and after organisational change. • Establishing the culture of the successor councils. • Overcoming skill shortages and ensuring the right talent is in place. • Managing the complexity of integrating services and delivering holistic support. • Challenges arising from Kent's role as a gateway to Europe, including managing transport, borders and asylum-related services across multiple tiers. • Lack of coordinated response for critical functions such as small boat arrivals and unaccompanied asylum-seeking children.

	• Inconsistent stages of Local Plan development leading to disjointed housing delivery and varied approaches to shared planning challenges. • Fragmentation of Housing Revenue Accounts across councils raising concerns about tenant equity and service consistency.
Change & devolution	• Managing the pace and uncertainty of change including delays in achieving devolution agreements. • Achieving timely and effective restructuring without losing momentum. • Navigating different cultures and leadership styles across councils and creating new cultural norms. • Ensuring that future devolution delivers real benefits and is not just a structural change.

Opportunities through local government reorganisation

Regardless of the model selected by government, all future Kent councils will work together to maximise the opportunities arising from the simplification of local government structures and the devolution of powers and funding to a new strategic authority.

Kent faces a pivotal moment to reshape its future through structural reorganisation.

Local Government Reorganisation (LGR) presents a strategic opportunity to streamline governance, tackle long-standing inefficiencies and build a more resilient, effective and financially sustainable system.

By moving toward a more unified model, Kent can unlock greater accountability, improve service delivery and position itself to fully capitalise on future opportunities for sustainable growth, investment and devolution.

Below is a summary of the key opportunities for Kent. These are discussed in relation to the proposed model.

Table 5: *Opportunities for Kent*

Public service reform	• Implementing whole-system approaches to public service reform (e.g. better integration with partners in health) and a more joined-up approach to council services (e.g. integrating adult social care with housing, children's services with cultural services, public health with wellbeing and housing, placemaking and custodianship services including highways maintenance and street cleansing and spatial planning with transport strategy. • Streamlining and digitising processes across currently separated services, including AI, and creating data and evidence hubs to improve efficiency and support collaboration with partners. • Aggregating services to build resilience and enable more holistic strategies across education, housing, skills and job creation. • Creating a single front door for residents to access services, improving accessibility and user experience. • Delivering structural reform that improves financial sustainability through economies of scale, streamlined service delivery and harmonised tax and income strategies.
Growth and devolution	• Securing devolution deals to unlock new powers and funding, enabling councils to drive growth and shape their own destinies. • Developing a compelling sustainable growth narrative and pipeline to attract investment. • Planning for growth in key areas such as ports, distribution depots, the Thames Estuary and leveraging proximity to London. • Leveraging structural reorganisation as a platform for a more ambitious devolution deal. A strategically-aligned unitary structure would support the establishment of a Strategic Authority, enhancing control over inward investment, tourism and infrastructure planning, providing successor arrangements to Visit Kent and Locate in Kent which are now in administration.

Workforce and culture	• Attracting and retaining top talent, especially in competitive areas near London and Essex. • Succession planning and supporting staff development to address an ageing workforce. • Empowering staff and fostering a positive, proactive culture. • Supporting staff through change, enabling career development and building resilience in the face of organisational restructuring. • Taking the opportunity for a strategic cultural reset to focus more on prevention and the transformation opportunities that come with partner alignment and systems working.
Community and place	• Focusing on resident-centred approaches including early intervention and impactful prevention. • Enhancing place-shaping by planning places, infrastructure and services more holistically. • Redesigning the sense of place and local identity, reconnecting people with their councils. • Improving accessibility to councils and services for all communities, including those in larger or more diverse geographies. • Designing governance arrangements that better reflect Kent's diverse communities, strengthening local accountability and enhancing trust between residents and local government.
Collaboration and integration	• Building wider partnerships across health, housing, policing, education and the voluntary/community and faith sector (VCFS). • Sharing knowledge and best practice across Kent and beyond. • Integrating services to deliver more holistic support and strategy. • Creating a one-team culture around place, breaking down silos and enabling more inclusive, joined-up working. • Enabling more cohesive sustainable economic development through unified Local Planning Authorities, ensuring continuity for major projects such as Otterpool Park near Folkestone and Heathlands near Maidstone, while improving cross-boundary management of shared constraints like nutrient neutrality and infrastructure viability.
Trust and engagement	• Re-establishing trust and confidence in local government. • Improving engagement with politics and public perception of councils. • Adopting fair funding models and ensuring best practice is shared and implemented. • Enhancing local accountability and trust by designing governance arrangements that are more representative of Kent's diverse communities.

Section 4: Vision and principles for Local Government Reorganisation

This section includes:

A shared vision for future local government in Kent

Design principles for reorganisation

How the vision and principles were co-developed

A shared vision for future local government in Kent

Our shared vision for Kent is:

Better outcomes for Kent residents through financially-sustainable and accountable public services delivered in partnership with communities.

All Leaders recognise that LGR in itself will not deliver the change required. It must be the catalyst for fundamental reform in how we deliver our services, how we work with our partners and how we deliver for all communities across Kent.

Our ambition for Kent's future is bold and resident-focused. We will deliver local government that is financially resilient, community-rooted and digitally enabled, delivering services that are simpler, smarter and more joined up.

Over the next five years, our shared aspiration for Kent is to:

1 **Strengthen identity** and maintain a deep sense of place and belonging.

2 **Build trusted, transparent relationships** with residents through open communication and active engagement.

3 Provide **seamless, resident-first experience** with easy, secure access to services.

4 Deliver **place-based, people-centred services**, focused on early intervention, prevention and improving life chances.

5 **Use data and technology smartly** to personalise support, anticipate needs and improve outcomes.

6 **Work in strong partnership** with statutory partners including health, education and the police as well as community organisations to meet residents' needs.

7 **Build community resilience** to social, economic and environmental challenges through inclusive, forward-thinking services.

At the heart of this vision is a commitment to residents, staff and place, balancing ambition with stability, innovation with identity and change with care.

LGR and devolution

All of the councils in Kent are supportive of devolving powers to a strategic authority to ensure decisions about the county are made in the county.

We do not underestimate the vital difference that devolution would make to economic growth, housing delivery, education and skills and transport and the benefits it would bring in terms of public service reform.

This is an opportunity to improve life chances for all.

Aligning the timeline of the strategic authority is key to avoiding a double reorganisation, by which we establish unitary authorities in April 2028 and either have to operate hosted services or to reaggregate services to go into a strategic authority shortly after.

This approach would require additional cost and create further disruption to staff as well as weaken public clarity on the nature and role of local government.

All councils in Kent support establishing a Mayoral Strategic Authority in April 2028 to operate alongside the future councils.

This will enable a seamless transition, enable synergies in programme management and leadership capacity and provide clarity to residents and partners regarding how local government in Kent will work.

Clarity for partners is critical given our ambitions regarding public service reform.

This requires consistency, developed relationships and focus on service delivery rather than ongoing structural change that is not focused on achieving service outcomes.

Our ambitions for devolution and the link to LGR is articulated further against Criteria 5.

Why Option 3A is best placed to deliver on our vision

Option 3A offers the strongest platform to deliver our shared vision for better outcomes through sustainable, accountable, and community-focused local government.

Creating three coherent councils – North, West, and East Kent – combines scale with local identity, enabling efficient, financially resilient, and digitally enabled services rooted in place.

Option 3A aligns closely with health, transport, and economic geographies, supporting seamless partnership working and integrated service delivery. By aligning to existing boundaries, it minimises transition complexity and cost while maximising transformation opportunities, ensuring simpler, smarter, and more joined-up services for residents.

Crucially, Option 3A provides the balance, capacity, and strategic focus needed to underpin future devolution, empowering Kent to deliver bold, resident-first public service reform and sustainable growth.

Design principles for future Kent Councils

To achieve our shared vision for Kent, a set of guiding principles have been agreed by its Leaders. While decisions on the detailed design and delivery models of future councils will be a matter for the respective leadership teams, these principles provide a blueprint for future council design.

Table 6: *Future council design principles*

Design principles	Description
Service and resident-centric	• Design services around resident needs with a resident-first mindset. • Maintain strong community identity and accountability. • Ensure equity in service access and outcomes across Kent.
Integrated and joined up	• Enable seamless, joined-up service delivery across public services. • Build on existing partnerships and promote shared responsibility, and budgets and co-locate where appropriate. • Embed co-production and community-based service design.
Data-driven and digitally enabled	• Invest in modern digital infrastructure which allows our service delivery and enabling activity to be joined up, and automated where appropriate. • Leverage data and AI to support early intervention, improve decision-making, and target resources effectively. • Ensure transparency and open data to build trust and inform priorities.
Financially resilient and efficient	• Adopt place-based financial planning and maximise asset efficiency. • Create efficient systems with flexible resource allocation based on demand. • Secure long-term funding and manage transition costs carefully.
Empowered and future-focused workforce	• Retain and support skilled staff through predictable roles and strong leadership. • Break down silos with collaborative problem-solving structures. • Modernise terms and conditions for a more agile and attractive public service offer.
Clear, consistent and bold leadership	• Be brave, honest and aspirational in setting direction and expectations. • Deliver clear, shared vision and values, internally and externally. • Ensure messages on devolution, change and local ambition are well understood.

These principles will be fundamental to navigating the transition, enabling Kent to go beyond safe and legal to deliver world-class public services and a better everyday experience for residents.

How the vision and principles were developed

The vision for Kent was developed through extensive work with local government leaders, reflecting a shared commitment to addressing key challenges and seizing future opportunities.

On 17 September 2025, Leaders and Chief Executives from across the 14 councils of Kent and Medway came together to co-create a shared vision for the future of local government.

This moment marked a significant step in the LGR journey, recognising LGR and devolution as unique shared opportunities to fundamentally reshape the way local public services are delivered.

The full-day event was carefully designed to help everyone work together, learn from each other and foster strategic thinking among senior leaders.

The aim was to better understand the current landscape of challenges and opportunities, to hear from others who have been through LGR and devolution journeys, and to begin developing a long-term, unifying vision for the future of Kent.

Participants were supported throughout by a facilitation team which guided discussions, captured key insights and ensured all voices were heard.

The vision for Kent emerged through genuine collaboration and a shared desire to improve outcomes for residents regardless of the final council configuration that is chosen for LGR.

The conversations acknowledge ongoing challenges such as financial constraints, workforce uncertainty and service fragmentation, with a shared commitment to tackling these as we progress through LGR.

Figure 6: *Sketches from workshop on 17th September*

How the vision and design principles will be used

The outputs from the event serve as the foundation for continued work on Kent’s LGR journey.

They will inform more detailed design work, engagement with stakeholders and the development of a compelling case for change.

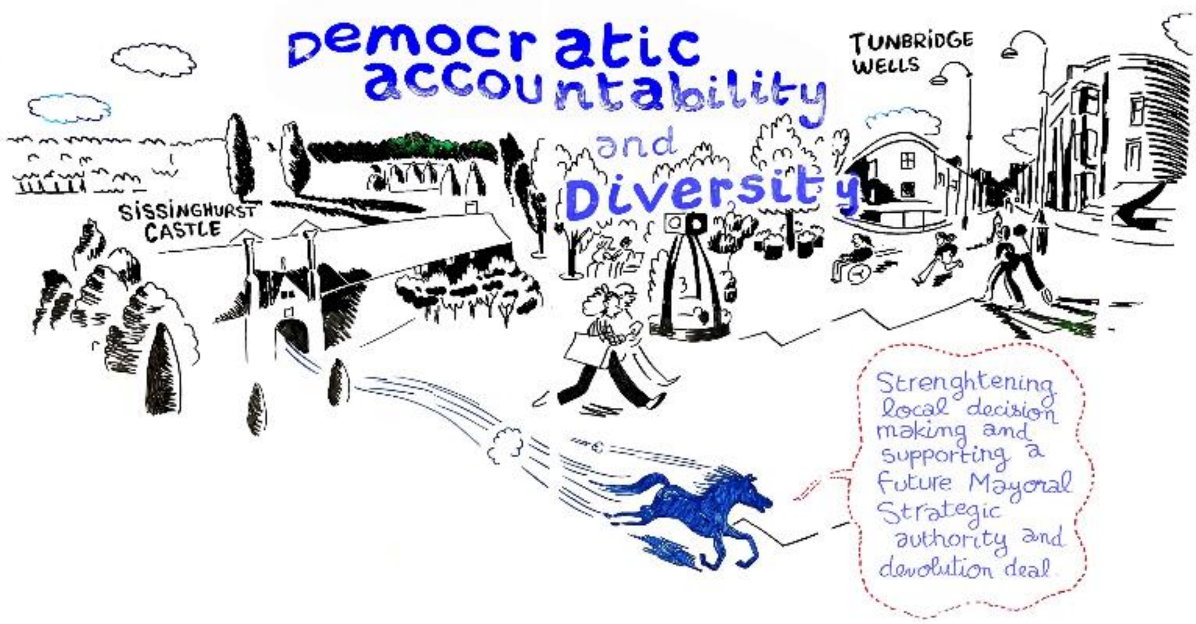
Most importantly, they represent a shared commitment by Kent’s leaders to act collectively in the interests of residents, staff, and communities.

This forward-looking framework sets a foundation for a more resilient, responsive and cohesive Kent by 2028.

This vision provides a clear strategic direction for the future of local government in Kent.

It will guide future design discussions, inform service transformation and tie in with the region’s approach to devolution.

It will be used to align decision-making, support engagement with residents and partners and ensure implementation remains focused on outcomes for people and communities.



Section 5: The case for Option 3A

This section includes:

The summary case for Option 3A

Criteria 1: Establishing a single tier of local Government

Criteria 2: Achieving efficiency, capacity, and financial resilience

Criteria 3: Delivering high-quality and sustainable public services

Criteria 4: Reflecting local identity and supporting a shared vision (Working together to understand and meet local needs)

Criteria 5: Supporting strategic devolution and regional priorities

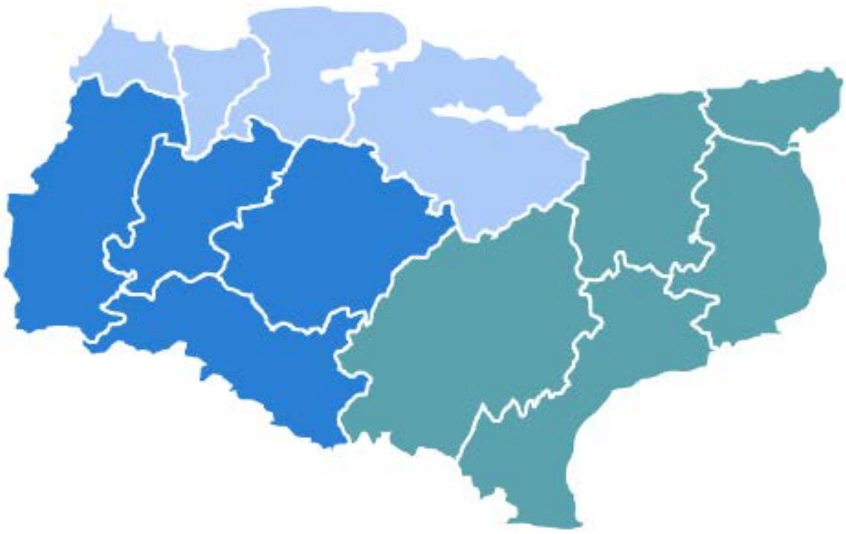
Criteria 6: Enabling stronger community engagement and neighbourhood empowerment

DRAFT

The summary case for option 3A

Option 3A proposes establishing three, balanced unitary authorities for North, West, and East Kent, each reflecting distinct economic strengths and natural communities. The model provides strong alignment with transport networks, travel-to-work areas, and key public service geographies, ensuring effective coordination and service delivery. It is the most efficient and sustainable option, offering balanced populations, lower transition costs, and minimal disruption to existing boundaries. Supported by major partners, it reduces complexity, maintains local identity, and provides strong foundations for devolution and community-focused governance across Kent.

***Figure 7**: Proposed councils (Option 3A) and key metrics by unitary*



Metric	North	West	East
Population Size (mid-2024)	686,716	567,062	677,906
Geographic area (sq km) (2024)	739	1,334	1,666
GVA per capita (£) (2023)	25,977	35,566	25,015

The summary case for Option 3A, organised by Government's six criteria for LGR, is set out below:

***Table 7:** Arguments for the proposed* model

Criteria 1: Establishing a single tier of local government	**Three strong, balanced councils with high growth potential and clear strategic focus** • Three geographically coherent councils, enabling strategic management of housing, infrastructure, spatial planning and growth.

	• Strongest balance in terms of population and council tax bases compared to other proposed models.
	• Each area has distinct strengths and areas of opportunity that will enable sustainable growth across the whole of Kent:
	  ○ North Kent: A strategically important area combining major transport corridors, international gateways, and logistics hubs with strengths in advanced manufacturing and professional services. The area is well positioned for future growth, with a focus on sustainable urban development and high-tech industry.
	  ○ West Kent: Knowledge-driven area with a high-quality natural environment and strong professional services, life sciences, and creative sectors. The area has a high proportion of knowledge-based employment and is well-positioned to attract inward investment from London and beyond.
	  ○ East Kent: A diverse coastal and rural economy with major ports offering vital connections to Europe, anchored by education hubs and a strong tourism offering. Combined with competitive land values, it is an appealing area with capacity for regeneration and development to attract investment.
	• Enables effective coordination of nationally significant infrastructure projects, particularly in the East, where the seaports of Dover and Ramsgate, Eurotunnel in Folkestone, the Port Health Authority in Ashford, and international rail links position the proposed East Kent unitary as the 'Gateway to Europe' with specialist capabilities in tourism and migration.
	
	Travel to work and strategic transport corridors
	
	• Option 3A delivers the best possible alignment to existing travel to work areas (TTWA), with all councils benefiting from strong motorway and rail connections into London and good intra-unitary transport links.
	• There is particularly strong alignment in East Kent, with TTWA boundaries being largely maintained across the Canterbury, Margate and Ramsgate, Folkestone and Dover, and Ashford TTWAs.
	• North and West Kent are well-served by the M25, M2, and M20 corridors and Southeastern rail links, including high-speed rail in the North.
	• East Kent benefits from multiple high-speed rail access points and key trunk roads like the M20 and Thanet Way.
	
	Efficient and locally focused democratic arrangements
	
	• Councillor-to-elector ratios have been modelled to be in line with recent reorganisation and will deliver strong local mechanisms for effective representation.

Criteria 2: Efficiency, capacity and withstanding shocks	**The most balanced population distribution** • Three councils with populations ranging from 567k to 687k, each meeting the Government's guideline of 500k. **The most efficient model, enabling long term financial sustainability** • The most financially efficient of the four options modelled, with the lowest disaggregation and transition costs and the highest potential reorganisation savings. The projected annual savings are £40.2m-£49.7m with payback within 5.4 – 6.7 years. **Minimising transition complexity and maximising transformation opportunity** • Option 3A minimises transition complexity by only utilising existing boundaries and in only creating three new councils, it has the lowest transition and implementation costs. • Critical to the future success and sustainability of LGR, three Kent councils will each have the scale and capacity to deliver collaborative, transformative and lasting public service reform. In partnership with our public sector colleagues the new councils will enable reform and service delivery at a Kent-wide level where appropriate. • No changes to current district boundaries means that potential delays, additional complexity and cost are avoided. Some models with boundary changes will require the integration of up to six councils in many of the proposed unitary areas, which would lead to significant cost, complexity and risk in terms of service delivery, aligning policies, contracts, staff terms and conditions, ICT systems and partnerships.
Criteria 3: High quality and sustainable public services	**Alignment with key service delivery partner geographies** • The model aligns closely with health and care partner geographies, particularly acute health trust geographies, minimising disruption and allowing for integrated service delivery from Day 1. Building on the existing collaboration in the Health and Care Partnerships, creates the maximum opportunity for the cultural and service transformation needed to achieve greater focus on prevention and shift from care in hospital to more care in the community. • Option 3A has the closest alignment of all models proposed to other public services, including police, health and fire, minimising operational disruption and enabling continuity in partnership working. This includes through community safety arrangements blended with current county functions with respect to both safety and safeguarding. • Creating councils across the three-area footprint offers stronger governance than county-wide teams, enabling place and people

	services to operate at a scale where local knowledge improves outcomes. **Minimising service fragmentation** • Three future councils, rather than four or five, will minimise service fragmentation of crucial upper tier services, reduce risk throughout implementation and maximise the existing expertise, knowledge and experience of colleagues in Kent County Council and Medway Council. • Using existing council boundaries simplifies governance and democratic process change management, avoiding additional fragmentation or aggregation of services. This significantly reduces the risk of service delivery failure during the transition compared to options involving multiple boundary changes. **Maximising balance in deprivation and demand between councils** • Regional disparities within Kent, mean that under any multi-council model there will be differences in deprivation and demand levels. The three-unitary model establishes a significant 'East Kent' council with the scale, capacity and growth opportunities to effectively and sustainably address the significant challenges of deprivation and service demand specific to that part of the region.
Criteria 4: Working together to understand and meet local needs	**Respecting cultural and historic identities** • The model respects established historic, cultural, and service geographies, including natural groupings such as the Thames Estuary communities in North Kent and coastal clusters in East Kent. • North Kent combines coastal and estuary landscapes with a history of industry and regeneration, and it is notable for its cultural diversity and youthful population. • West Kent is characterised by scenic countryside, extensive Green Belt, and Areas of Outstanding Natural Beauty, it is rich in historic landmarks, heritage villages, and cultural hubs. • East Kent is known for its strong coastal identity and tourism appeal, it features UNESCO sites, historic ports, creative centres, and iconic attractions such as the White Cliffs of Dover. • The model aligns to existing economic flows, transport patterns, travel to work areas and public service access e.g. health and housing – supporting a greater sense of local identity and cohesion. **Reflecting the clear preferences of our public service partners** • The model has received strong endorsement from public service partners, including: o NHS Kent & Medway, who support the model's alignment with health economies and services;

	○ Kent Police and Crime Commissioner, who prefers a three-unitary model as most closely aligning with existing police command units and as minimising cost and service impact; ○ Kent Fire and Rescue, citing opportunities for service streamlining and regional planning.
Criteria 5: Supporting devolution arrangements	**Equal regional representation** • Three well balanced councils in Kent, able to operate strategically and equitably within the future Mayoral Strategic Authority (MSA). • The small number of constituent authorities within a combined strategic area enables clearer accountability and governance, working with a future mayor and other regional partners to deliver effectively. **Unlocking the devolution vision** • The proposed councils are built on strong functional economic areas and planning geographies, aligning with the government's focus on devolving powers to areas capable of delivering large-scale projects and service transformation. • The creation of three sufficiently sized unitary areas enables effective strategic planning to meet priorities including government housing targets, economic growth and care integration.
Criteria 6: Stronger community engagement and neighbourhood empowerment	**Strong and consistent democratic engagement and local empowerment** • Across all the proposed models, future councils will be larger and therefore require appropriate new mechanisms to support local democratic engagement, such as area committees. • Neighbourhood Area Committees (NACs) are Kent's preferred model for strengthening local engagement through LGR. They connect communities with services and decision-making, integrating Town and Parish Councils, statutory services, and community groups with the aim to empower residents and drive strategic impact. • The proposed unitary structure facilitates targeted support for unique communities, such as coastal towns, by grouping them within authorities that understand and can respond to their specific needs.

How the case for change is structured against government criteria

What follows is the case for change detail, setting out how the proposed model meets the government's six criteria.

It is a combination of shared content across four options (3A, 4B, 4D and 5A) and content specific to the individual options.

Sections and sub-sections are set out below, including how they align to Government criteria, as stated in the letter dated 5 February 2025.

Table X: *Structure of case for change and link to government criteria*

Section headings	Sub-section headings	Govt criteria
Criteria 1: Establishing a single tier of local government	Alignment with functional economic areas and a sustainable tax base	1a
	Strategic geographic boundaries to support housing and infrastructure delivery	1b
	Simplified and accountable governance through a single-tier structure	1d
Criteria 2: Achieving efficiency, capacity, and financial resilience	Delivering scale to support operational resilience and efficiency	2a, 2b
	Maximising value for money through financial efficiencies	2c
	Managing transition costs while enabling long-term transformation	2d
	Strengthening the financial sustainability of local government	2e
Criteria 3: Delivering high-quality and sustainable public services	Improving delivery of key services	3a, 3c
	Public service reform	3b
Criteria 4: Working together to understand and meet local needs	Incorporating public and stakeholder engagement in model design	4a, 4c
	Preserving local identity, culture and historical significance	4b
Criteria 5: Supporting strategic devolution and regional priorities	Unlocking the devolution vision in Kent	5a, 5b
	Population sizes that support devolution	5c
Criteria 6: Enabling stronger community engagement and neighbourhood empowerment	Community engagement and neighbourhood empowerment across Kent	6a, 6b
	Neighbourhood Area Committees (NACs)	6a, 6b

Criteria 1: Establishing a single tier of local government

This section includes:

Alignment with functional economic areas and a sustainable tax base	**Criteria 1a**
Strategic geographic boundaries to support housing and infrastructure delivery	**Criteria 1b**
Simplified and accountable governance through a single-tier structure	**Criteria 1d**

Alignment with functional economic areas and a sustainable tax base

Criteria 1a. 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.

Option 3A aligns with Kent's distinct economic geographies, creating sensible, functional areas with strong and sustainable tax bases. Each unitary brings together places with complementary economic strengths, ensuring balanced GVA, robust business rate capacity, and manageable council tax variations. Together, they support long-term prosperity, regional equity, and place-based growth aligned with future infrastructure and investment opportunities.

Aligning councils with growth opportunities

The 3A model brings together places with complementary economic profiles and infrastructure. It reflects the distinct economic geographies of the region in a manner that will enable future development and growth.

As set out below, each of the three unitary areas has significant growth opportunity.

Table 8: *Growth opportunities across the three unitary areas*

North Kent: • Dartford • Gravesham • Medway • Swale	**North Kent brings together nationally significant infrastructure and economic assets, forming part of the Thames Estuary Production Corridor. This nationally significant location supports strategic housing and employment growth in Medway and Dartford, with the whole North Kent region well positioned to grow its existing industries and infrastructure to take advantage of opportunities in high-tech industry and urban development.** • Ebbsfleet Garden City with its international, high-speed station creates significant housing and commercial development opportunities. • The Lower Thames Crossing (LTC) will enhance connectivity between Kent and Essex, boosting economic integration and accessibility. • Dartford is a strategic gateway to Kent, with the Dartford Crossing and its proximity to London, supporting high commuter flows and logistics to enhance connectivity in the future unitary. • Medway is the largest urban area in Kent and Medway, with a population of nearly 300,000, offering critical mass for growth in sectors such as creative industries, engineering, and higher education. • Gravesham offers key opportunities in transport and infrastructure investment for the region, given its proximity to Ebbsfleet, the River Thames, and the M25. • Swale serves as the physical and economic bridge between North, East, and Mid Kent. The Port of Sheerness is a key deep-water port with national logistics importance. • Swale includes both mainland and the Isle of Sheppey, offering a mix of coastal, rural and industrial assets. This diversity offers the future unitary

	an opportunity to develop balanced growth strategies across multiple sectors.
West Kent: • Maidstone • Sevenoaks • Tonbridge & Malling • Tunbridge Wells	**West Kent has a mix of rural and urban economies, with its heritage towns and creative sector leading to a thriving tourism industry. West Kent's high quality of life and access to key transport routes into North and East Kent, London and Europe, supports significant knowledge-based employment opportunities to a highly skilled workforce and ensures that the region is well-positioned to attract investment from London and beyond in areas such as green infrastructure.** • Maidstone, the county town of Kent, hosts a concentration of public services and legal institutions, and is an important employment hub for the region. In the future unitary, this area will be key in coordinating public service delivery and supporting economic growth. • Sevenoaks has two National Landscapes, Kent Downs and High Weald, and an array of heritage assets which strengthen its tourism potential. As a well-connected commuter town, offering direct rail links to London and Oyster card services from Swanley, it presents strong opportunities for connectivity-driven growth. • Tonbridge & Malling, whilst predominantly rural, has key market towns, contributing to its strength in small-scale industry, logistics, and a growing professional services sector which can be leveraged to support the regional economy. • Tunbridge Wells serves as a cultural and economic centre in West Kent, with a strong residential property market and an educated workforce. These strengths can drive regional skills development and attract investment.
East Kent: • Ashford • Canterbury • Dover • Folkestone & Hythe • Thanet	**East Kent has nationally strategic transport and infrastructure with trade ports, high-speed and international rail and major motorway links, this connectivity will support future innovation and growth in the region. Regeneration and development offer significant growth opportunities, with competitive land values and capacity for significant housing growth. The aging demographic of some areas in the region provides potential for economic renewal through investment and reform in health infrastructure, education and skills.** • Canterbury is a sub-regional economic centre, home to four higher/further education institutions and significant cultural heritage, including UNESCO World Heritage Sites, offering a strong foundation to foster education, culture-led regeneration, and a skilled workforce across the wider area. • Thanet boasts extensive coastline, Blue Flag beaches, and a growing creative and digital economy centred around Margate, Ramsgate and Broadstairs. The coastal assets and creative economy present opportunities to drive sustainable tourism and technology growth. • Dover is a critical international gateway for the whole region and the UK more broadly, with the Port of Dover handling a nationally significant level of UK trade in goods.

	• Ashford is Kent's largest borough by area, with rapid population and housing growth, supported by high-speed rail to London and access to international routes via Eurotunnel in Folkestone. This offers key opportunities to manage sustainable expansion and improve regional accessibility. • Folkestone & Hythe has excellent connectivity to mainland Europe via the Channel Tunnel. It is experiencing significant regeneration and growth, focused on creative industries, digital economy, and green technologies, which will enable the future unitary to promote innovation-led regeneration and cross-border collaboration in emerging sectors, with significant housing growth planned at the new town of Otterpool Park.

Balanced economy and tax base

The three proposed geographies have similar Gross Value Added (GVA), ranging from £20.1bn in West Kent to £17.0bn in East Kent. All areas have large tax bases and therefore ability to generate revenue and room for growth.

The comparatively higher GVA per capita in West Kent (£35.6k) reflects the reality of current differences in income and productivity across Kent. However, the model is designed to minimise imbalance, with North Kent and East Kent each having a mix of wealthier and more deprived areas within them, both avoiding the creation of a single authority which is at a particular disadvantage and enabling place-based growth opportunities to be identified and taken advantage of.

The three councils are broadly balanced in terms of economic strength, which effectively supports sustainable growth and resilience across each unitary.

Table 9: *Economy and tax base metrics for 3 unitary model option*

	North Kent	West Kent	East Kent
Gross Value Added (GVA)[14] (£m) (2023)	17,839	20,168	16,958
GVA per capita (productivity)[15] (£) (2023)	25,977	35,566	25,015
Council tax base (no. of band D equivalent properties) (FY28/29)[16]	225,749	231,972	245,804
Council tax average band D rate (exc. Fire, Police and Parishes)[17] (£)	£1,842	£1,904	£1,907
Retained business rates (2024-25)[18] (£m)	137.7	113.2	113.7

[14] Regional gross domestic product: local authorities - Office for National Statistics
[15] Regional gross domestic product: local authorities - Office for National Statistics
[16] Financial data return submitted by councils
[17] Financial data return submitted by councils
[18] National non-domestic rates collected by councils in England: forecast 2024 to 2025 - GOV.UK

Deprivation score (2019)[19]	0.13	0.08	0.14

Business rates

Business rates tax bases are strong, with each unitary generating between £113m and £138m in retained business rates. All three authorities have the economic capacity to operate independently and sustainably.

Any minor imbalances between proposed councils are countered by strong growth potential, which will support longer-term economic growth and prosperity across the whole of Kent. Each authority will be able to tailor economic and employment strategies to local needs, while aligning with the wider strategic ambitions of Kent.

Council tax

Each unitary has a sufficient council tax base to support service delivery, ranging from c. 226k to c. 246k Band D equivalent properties. Tax bases are also balanced, which supports fair council tax harmonisation for long-term financial stability. Differences in average band D rates between councils within each proposed unitary are modest, ranging from £1,842 to £1,907, minimising disruption for residents and reducing administrative complexity during transition.

Council tax harmonisation

Council tax harmonisation is an important and sensitive area. Council tax rates must be consistent by the eighth year of a unitary authority and there are currently significant disparities in council tax rates across Kent.

***Table 10:** Current council taxbase, rates and yield*

Current council	2024-25 final taxbase[20]	Current combined Band D rate[21]	Current Tax Yield
Ashford	49,832	£1,799	£89,636,805
Canterbury	53,348	£1,851	£98,732,177
Dartford	41,029	£1,796	£73,679,473
Dover	40,875	£1,825	£74,604,137
Folkestone & Hythe	40,466	£1,907	£77,159,931
Gravesham	35,995	£1,842	£66,296,691
Maidstone	68,264	£1,904	£129,958,194
Medway	90,913	£1,755	£159,523,255
Sevenoaks	52,395	£1,855	£97,168,160
Swale	50,368	£1,812	£91,242,368
Thanet	46,454	£1,874	£87,054,908
Tonbridge & Malling	53,478	£1,849	£98,879,623
Tunbridge Wells	48,361	£1,816	£87,822,911
Total	**671,778**		**£1,231,758,633**

[19] Mapping income deprivation at a local authority level - Office for National Statistics
[20] Financial data return submitted by councils
[21] Financial data return submitted by councils

The baseline council tax point to which the rates will be harmonised will be set through key decision by the shadow authorities.

This is a sensitive political decision as it is likely to result in an increase in council tax rates for residents in areas which currently charge lower rates.

Council tax harmonisation is governed by the referendum limits so the increase will be in line with what is legal and acceptable under the current system.

This also means the total council tax bill across Kent will be lower than if all current councils increased rates at the maximum allowed as would be typical in local government.

This is because residents who currently pay rates at, or higher than, the baseline rate set by the shadows will have their council tax rate frozen or potentially reduced to align with the baseline rate.

While there are many different scenarios including the baseline rate and the rate of increase, council tax harmonisation can be achieved within seven years and we have not assumed any increase in council tax rates into the financial modelling.

Strategic geographic boundaries to support housing and infrastructure delivery

Criteria 1b. Proposals should be for a sensible geography which will help to increase housing supply and meet local needs.

Option 3A balances population, transport, and local needs across North, West, and East Kent. It creates manageable areas that support coordinated housing growth and infrastructure investment, while responding more effectively to spatial constraints and issues like homelessness – enabling sustainable, region-wide development.

Geographies and population

The model achieves a strong balance of population and geographic area across the three proposed councils. This balance enables effective governance, manageable service delivery footprints, and equitable representation. Population densities vary logically due from differences in urban and rural geographies, allowing tailored service priorities for each council.

***Table 11:** Geographies and population in 2023 and 2032 forecasts*

	North Kent	West Kent	East Kent
Population (mid-2024)[22]	686,716	567,062	677,906
Geographic area (sq.km)[23]	738.9	1,335.1	1,665.3
Population density (people per sq.km) (mid-2024)[24]	929.4	424.7	407.1
Forecast population 2032 ONS[25]	709,055	596,059	705,644
Forecast growth	5.7%	6.8%	5.3%

Sensible geographies

Option 3A balances area sizes to avoid creating rural authorities that are too large to manage effectively or urban authorities that are too small to offer spatial flexibility. Population densities also vary, from 407 people per sq km in East Kent to 929 in North Kent, reflecting the region's natural settlement patterns. Additionally, the three-unitary model enables larger geographies which provide for a more balanced approach that supports strategic planning – facilitating more effective housing allocation, infrastructure investment, and Local Plan integration.

Alignment to spatial planning constraints

The model addresses spatial planning constraints more holistically by combining wider areas across the north, west and east, allowing for a more equitable distribution of available land for major developments, including housing, commercial space, and infrastructure. This geographic breadth provides local councils with greater flexibility to allocate development to the most suitable locations, rather than being constrained by the tight boundaries and competing land-use pressures faced by smaller authorities. In this context, there is scope for development across all three unitary

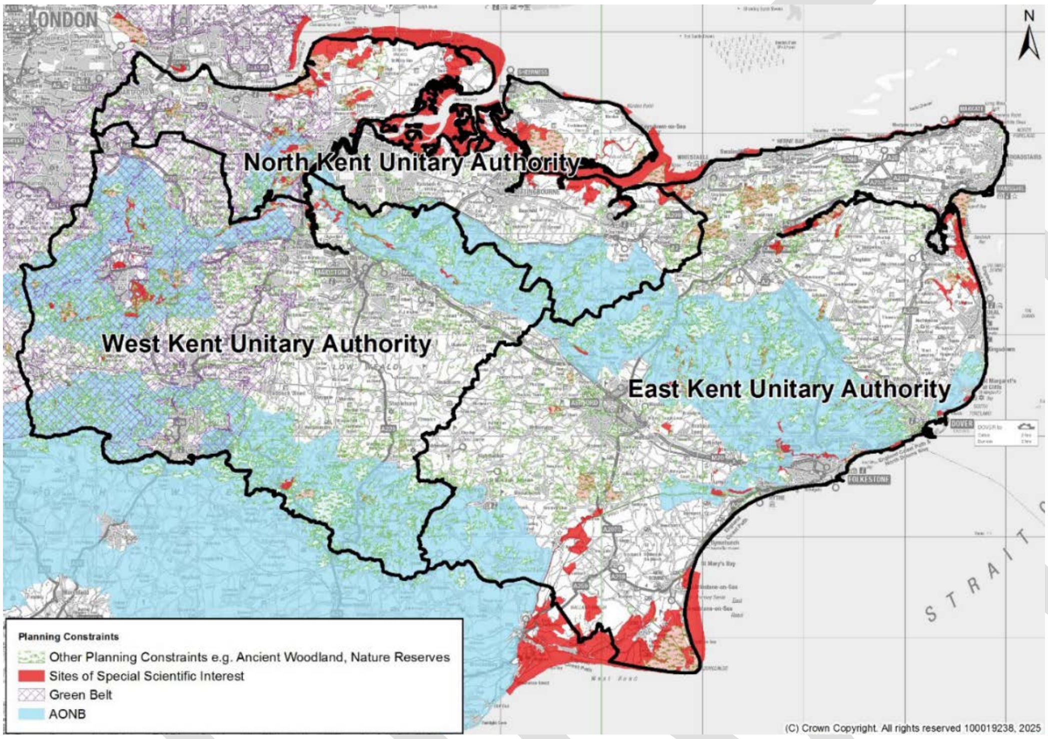
---

22 Estimates of the population for England and Wales - Office for National Statistics
23 Standard Area Measurements for Administrative Areas (December 2023) in the UK
24 Estimates of the population for England and Wales - Office for National Statistics
25 Subnational population projections for England - Office for National Statistics

areas, including in West Kent, which would face greater limitations if it were not grouped with Maidstone.

Larger unitary authorities are also better positioned to strategically plan around environmental constraints, such as Green Belt land and National Landscapes (previously AONB). This broader oversight helps to ensure that growth and environmental protection are balanced more effectively, with development directed away from sensitive areas while still meeting housing demand. The model supports a stronger, more sustainable growth narrative by unlocking land where space is genuinely available, enabling the delivery of homes and infrastructure at a scale necessary to support long-term economic and community needs.

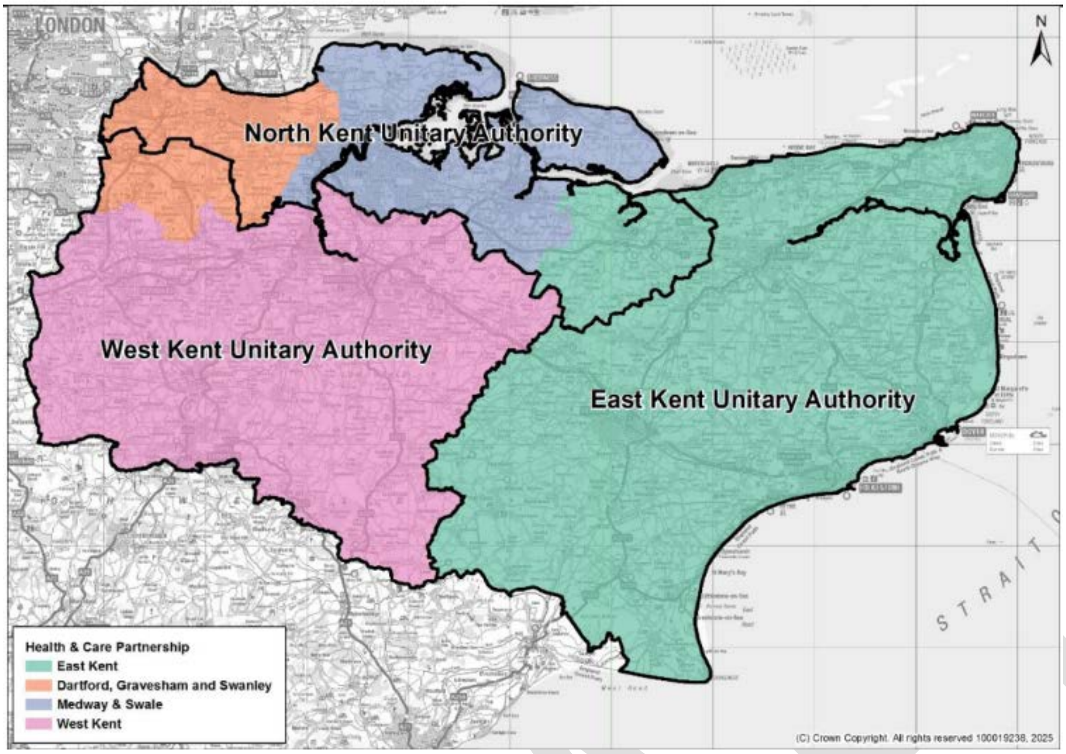
Figure 8: **Map of spatial planning constraints**



<u>Alignment to service delivery partner boundaries</u>

The model is strategically aligned closely with NHS health and care partner geographies, as can be observed in the map below, and particularly acute health trust boundaries. This deliberate alignment ensures that the service delivery framework integrates seamlessly within existing local structures, fostering collaboration and reducing fragmentation across care pathways. By broadly reflecting the geographies of principal health partners, the model minimises disruption during implementation, enabling a smoother transition for both providers and service users. As a result, integrated service delivery can be realised from Day 1, enhancing continuity of care, improving patient outcomes, and optimising system efficiencies across the health and social care landscape.

Figure 9: *Map of NHS Health and Care Partnership*



Travel to work patterns across Kent

The figure below shows the distribution of workers across Kent, along with commuting flows into and out of these areas.

Travel to Work Areas (TTWAs) are defined as geographic zones where at least 75% of residents work within the same area and at least 75% of workers also live there.

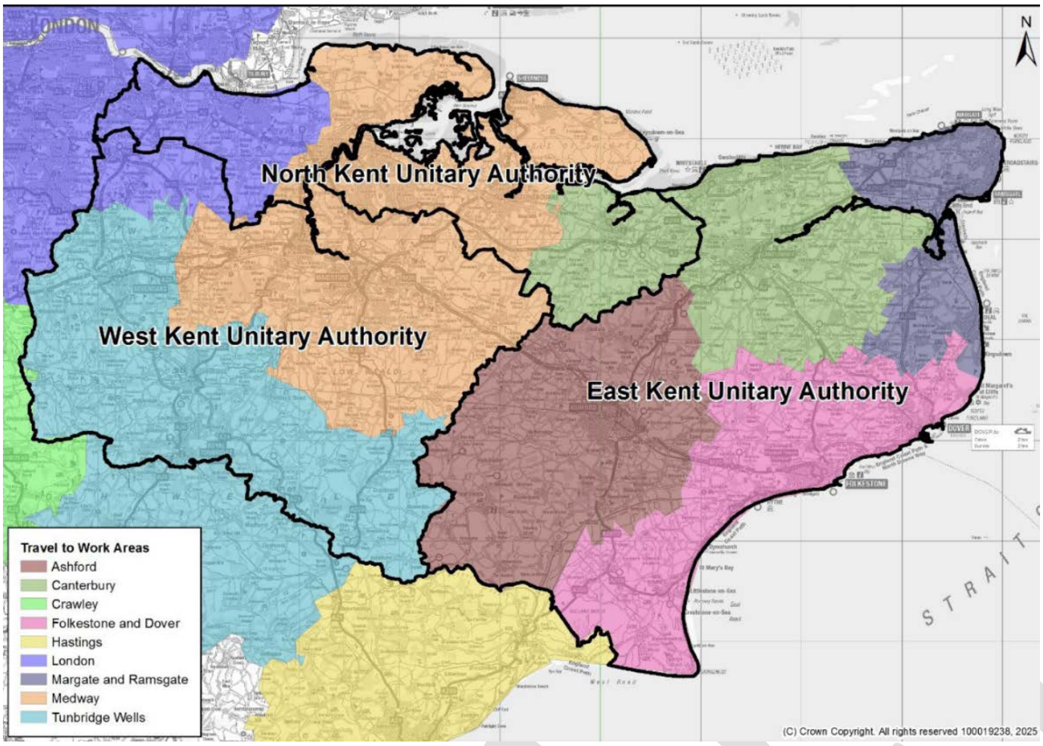
These areas represent self-contained local labour markets with boundaries statistically designed to reflect real-world commuting patterns.

The eastern Kent area has a greater local catchment of employees, with the majority of people working within 5km of their home.

In contrast, western Kent residents tend to travel, reflecting those who work locally in addition to those who travel slightly further to work in London.

Option 3A demonstrates alignment with functional geographies in relation to travel to work areas (TTWAs). In East Kent, there is strong consistency with existing TTWA boundaries, notably across Canterbury, Margate and Ramsgate, Folkestone and Dover, and Ashford.

***Figure 10*: Map of travel to work areas against unitary areas**



The table below gives an overview of current commuting and travel patterns aligned to the three unitary geographies.

Table 12: *Overview of travel to work across unitary areas*[26]

Proposed Council	Current council areas	Key travel patterns and alignment to travel to work data
North Kent	Dartford, Gravesham, Medway, Swale	**North Kent, particularly Dartford and Gravesham, exhibits strong outward commuting flows to London and surrounding counties like Essex, enabled by rail and road connections across the region.** • Dartford stands out with 7.8% of workers commuting by train, more than double the Kent average, highlighting its role as a key London commuter hub. Gravesham follows closely behind with 5.3% using trains. • In contrast, Medway is more self-contained, with over 52% driving to work and only 4% commuting by train. Despite being well-connected, many Medway residents both live and work locally. • Swale sees high car dependency (54.8%). This reflects limited public transport access or jobs distributed across rural and suburban areas.
West Kent	Sevenoaks, Tonbridge & Malling, Tunbridge	**West Kent shows distinct characteristics of a commuter belt, with significant train and car travel outside of the local area.**

[26] https://www.kent.gov.uk/about-the-council/information-and-data/facts-and-figures-about-kent/economy-and-employment-data/kents-workforce

	Wells, Maidstone	• Train usage is relatively high: Sevenoaks has 5.4% train commuters, with Tonbridge & Malling and Tunbridge Wells around 3%. At the same time, car use remains substantial, especially in Maidstone (50.1%), the largest borough by workforce. • In Sevenoaks and Tunbridge Wells, over 42% of residents work mainly from home, significantly higher than the Kent average (31.1%).
East Kent	Canterbury, Dover, Thanet, Ashford, Folkestone & Hythe	**East Kent has lower reliance on rail than the other unitaries, with higher proportions of people walking or driving to work, indicating more localised employment or limited public transport options.** • In Canterbury, 10.8% of people walk to work, the highest in Kent, reflecting its compact city layout and university economy. Rail usage remains modest (2.3%) compared to other areas. • Dover, Ashford, and Thanet have high car dependency (around 50%) and relatively low train usage (~2.0–2.4%), suggesting fewer commuting options or jobs located closer to home. Thanet, with 3.5% using buses, has the highest bus usage in Kent, possibly reflecting socio-economic factors or transport access challenges. • Ashford benefits from HS1 rail links, which likely contribute to 2.5% train usage, the highest in the area. Folkestone & Hythe shows similar patterns, although with more walking commuters (9.1%), possibly linked to a denser urban core.

Travel infrastructure

Kent benefits from a comprehensive strategic transport network.

Major motorways including the M2, M20, M25, and M26 provide vital road links to London, the wider south east and key ports such as Dover and Folkestone.

These roads primarily connect Kent from the east to west through the districts and eventually into London.

While the east to west connection is strong, the north to south connection through Kent is less direct, particularly for those not commuting into London.

The county is also well-served by rail, with services operated by Southeastern on the North Kent Line, Chatham Main Line and the UK's only domestic high-speed rail service, High Speed 1 (HS1), which connects Kent to central London via St Pancras International in under 40 minutes.

Strategic transport corridors across the three unitary regions

Kent's three unitary regions are each supported by key transport corridors that enhance connectivity and economic activity. North and West Kent benefit from the M25, M2, and M20 motorways alongside Southeastern rail links, providing efficient routes for commuters, freight, and access to London and the wider South East of England. East Kent is uniquely advantaged by high-speed rail services and vital trunk roads like the M20 and the Thanet Way, which connect coastal towns and facilitate rapid travel to London and continental Europe. It unites Dover, Folkestone and Ashford to provide for coherent oversight of the county's strategic road and rail entry ports. Together, these transport corridors create an integrated network that supports regional growth, trade, and accessibility, ensuring Kent remains a crucial gateway between the capital and mainland Europe.

Table 13: *Transport connectivity across the three unitary areas*

North Kent	• Dartford: M25 runs north to south through the district. Northern side flanked by River Thames and southern side flows into Sevenoaks. North Kent line connects to London and Medway. • Gravesham: Watling Street (A2) is the main road running west to east, eventually entering the M2. Southeastern rail connects Dartford with Gravesham and high-speed rail at Gravesend and Ebbsfleet provides connection to London and East Kent • Medway: A229 runs north to south and eventually meets the M2. Thameslink and Southeastern rail, with high-speed services, connects to London. • Swale: M2 runs east to west connecting Faversham and Sittingbourne. Swale rail line provides local connections.
West Kent	• Sevenoaks: Well-connected with M25, M26 and A21 providing connectivity to north, south, east and west. Southeastern main line connects to London. • Tonbridge & Malling: Well-connected by M20 and M26 running east to west. Southeastern rail connects to Tonbridge and West Malling. • Tunbridge Wells: No motorways run through the district, though there are several A-roads providing connections to the rest of Kent. Southeastern trains provide rail connections to London. • Maidstone: M20 runs east to west through the district. More rural areas outside of the M20 and A229 corridors are not as well connected. Multiple towns across the district are directly connected to London through rail, including Maidstone in the north and Marden in the south.
East Kent	• Ashford: High speed rail provides direct connection into London as well as wider Kent and the M20 runs through the district giving access to North Kent and Folkestone. • Canterbury: Thanet Way (A299) runs east to west connecting to the M2, as does the A2 linking the district to Dover. Connections from rural areas into Canterbury are good. Southeastern rail provides connections to London and elsewhere in Kent. • Dover: All major roads across East Kent connect into Dover, particularly the A2, A20 and A256, however outside of these main routes, road connection is more limited. Southeastern and Chatham main rail lines connect to London.

	• Folkestone & Hythe: M20 provides an east to west connection to Ashford and Dover in the north of the district, however much of the rest of the district relies on more minor roads. High speed rail connects through Kent and into London. • Thanet: Canterbury Road (A28) is the main connection from Margate to Canterbury and Ashford in the north of the district and the A299 provides connections across the south of the district from Ramsgate. Southeastern rail provides connections to London.

Why Option 3A delivers on housing and homelessness

LGR provides the opportunity to think differently and more strategically, beyond current district boundaries. This opportunity must be used to learn from the areas with the strongest track record of delivery and apply best practices across the new councils.

The three new councils will:

- Be ideally positioned to coordinate spatial planning, helping to ensure that growth is both deliverable and supported by the infrastructure residents expect.
- Address spatial planning constraints by combining wider areas across the north, west and east, allowing for a more equitable distribution of available land for housing.
- Provide a stronger platform for joined-up place-shaping and regional coordination, with balanced distribution of housing and infrastructure investment across the region.
- Have significant scale to plan strategically and negotiate effectively with government and developers.
- Reflect local housing markets and avoid the dilution of focus that can occur in overly large geographies.
- Avoid the fragmentation risks of a model with more, smaller councils, which may lack the capacity to manage housing pipelines or respond to homelessness effectively.

By combining sufficient scale with proximity to local markets, the three-unitary structure will strengthen the ability to deliver new homes where they are most needed across all three areas. In particular, East Kent – where homelessness levels are highest – will benefit from being a large council that combines areas of higher deprivation with those that are less deprived, ensuring the resources and capacity are in place to tackle homelessness effectively.

Complementary housing profiles and challenges in the 3A model

Table 14: *Housing and homelessness metrics for Option 3A*

Metric	North Kent	West Kent	East Kent
Homelessness Rate (per 1,000 Households) (Apr-Jun 2024)[27]	6.6	4.1	8.4
Housing Delivery Test 2023 Measurement (%)[28]	84.4	91.9	86.2

[27] Tables on homelessness - GOV.UK
[28] Housing Delivery Test: 2023 measurement - GOV.UK

Homelessness rates between council areas are relatively balanced, with West Kent performing slightly better. Housing delivery is similar across the region, ranging from 84% to 92%.

Simplified and accountable governance through a single-tier structure

Criteria 1d. 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.

Option 3A streamlines local government by reducing duplication and cutting costs, while maintaining strong community representation through enhanced neighbourhood engagement.

Current electoral arrangements

As set out in the table below there are currently a total of 658 councillors across Kent, including 81 county councillors, 518 district councillors and 59 unitary councillors in Medway.

Kent County Council is divided into 72 electoral divisions with 63 single-member divisions and nine two-member divisions.

Councillor to electorate ratios vary across Kent, but the combined ratio is 1:2,102.

Table 15: *Councillor to electorate ratios across Kent*

Council	District/ unitary councillors	County councillors	Total councillors	Electorate	Electorate per councillor	Divisions	Wards
Medway	59	N/A	59	206,567	3,501*	N/A	24
Ashford	47	7	54	100,660	1,864	7	39
Canterbury	39	8	47	111,160	2,365	8	21
Dartford	42	6	48	86,560	1,803	6	20
Dover	32	7	39	88,820	2,277	5	17
Folkestone and Hythe	30	6	36	84,940	2,359	6	13
Gravesham	39	5	44	77,240	1,755	3	17
Maidstone	49	9	58	133,960	2,310	8	22
Sevenoaks	54	6	60	90,200	1,503	6	26
Swale	47	7	54	111,460	2,064	6	24
Thanet	56	7	63	104,500	1,659	5	23
Tonbridge and Malling	44	7	51	100,240	1,965	6	19
Tunbridge Wells	39	6	45	87,340	1,941	6	14
Total	**577**	**81**	**658**	**1,383,647**	**2,103**	**72**	**279**

**As a unitary authority, Medway has a different governance structure, explaining its higher ratio than other areas across Kent*

What we know about elections to new councils

Elections to shadow authorities will take place in May 2027.

The Boundary Commission (LGBCE) recommends using existing boundaries, e.g. divisions or wards, as building blocks for these first elections but the guidance is to focus on the number of councillors rather than drawing proposed electoral maps at this stage.

Between May 2027 and next elections in May 2032, there will be a review of electoral boundaries and new arrangements put in place.

We understand LGBCE's preference is to avoid significant changes in councillor numbers so arrangements for 2027 should align closely to expectations of councillor numbers from 2032 onwards.

Reference points for councillor ratios

Set out below are some examples of councillor-to-electorate ratios for newly-formed unitary authorities in recent years, with a focus on larger authorities which are more relevant for comparison.

Table 16: *Examples of councillor to electorate ratios*

Council	Established	Councillors	Electorate	Electorate per councillor
Dorset	2019	82	297,726	3,631
Buckinghamshire	2020	97	420,610	4,336
North Northamptonshire	2021	68	263,915	3,881
West Northamptonshire	2021	76	307,611	4,048
Somerset	2023	110	446,698	4,061
North Yorkshire	2023	90	478,539	5,317

Proposed councillor numbers for Option 3A

In accordance with LGBCE guidance on LGR, this proposal recognises the need to put the principle of numbers of councillors first, considering effective operation and councillor capacity within the new unitary authorities. We also recognise the challenge in pinning down precise numbers at this stage of the LGR process and the complexity inherent in creating new authorities. At this stage we do not know numbers of committees and governance structures that elected councillors might want. What we do know is that:

- Area committees will be essential, both for regulatory purposes (i.e. area planning committees) and community engagement (including recognising any forthcoming requirements through the English Devolution and Community Empowerment Bill),

- Unitary authorities have the full breadth of local authority functions to perform, and
- Kent has high populations

Therefore, this proposal aims for a range of 80-95 councillors – which sits within the LGBCE's Council Size submission guidance range of 30-100 – this is our first principle.

Secondary to that is the principle of achieving a suitable electorate to councillor ratio and electoral equality – we are aiming for 1 : 5,000 (+/-10%) due to population sizes, driven by the need to achieve the correct councillor numbers (first principle) but also to manage workload and provide local representation. This principle is being weighted on the basis that the LGBCE will be conducting a review prior to elections in 2032.

Applying those principles to each new council within this proposal produces the following:

Table 17: *Calculating proposed councillor numbers per council*

	North Kent	West Kent	East Kent	TOTAL
Electorate[29]	481,827	411,740	490,080	1,383,647
Proposed number of councillors	**90**	**84**	**95**	**269**
Electorate to councillor ratio	**1: 5,354**	**1: 4,902**	**1: 5,159**	**1: 5,144**

* Electorate figures source: data provided by Kent County Council, based on governance petition verification number (February 2025) and Medway Council electorate (February 2025).

Across Kent this gives a total of 269 Councillors, and an average of 1 councillor per 5,144 electors.

In proposing these numbers, we have considered the following:

- **West Kent –** based on county divisions (splitting 2 member divisions first) – first and second principles achieved.
- **North Kent –** based on county divisions (splitting 2 member divisions first) and for Medway Unitary area using warding, combining wards to achieve an average of 3 councillors per 2 current wards. This also brings the electorate ratio (second principle) for Medway into line with the rest of the unitary area – first and second principles achieved.
- **East Kent –** based primarily on county divisions (splitting 2 member divisions first), this would produce too high a number of councillors on its own, so in some areas (starting with lower electorates per division) a combination of district wards has been used to reduce the overall number down to meet the first principle. The higher total number of councillors is required in East Kent to meet the unitary needs that will arise from Area Committees (particularly for community engagement) resulting from combining five separate authorities (covering multiple separate communities) together.

As with all local government boundary changes, flexibility will be required on both the precise final councillor numbers and boundary methods used to ensure they are fit for purpose. When the

[29] Electorate at date of May 2025 Kent County Council elections and latest available electorate data for Medway

detailed work is conducted, the LGBCE will be engaged to advise and support to ensure this is achieved.

Caveats on proposed councillor numbers

Once the geographies are agreed, the constituent councils of each area will prepare and agree what is required for first elections to each council.

Efficient and locally focused democratic arrangements

The 3A model will create a new democratic structure that is more efficient and delivers savings while still maintaining a scale that allows for local focus. It reduces duplication, simplifies decision-making, and ensures that powers are held at the appropriate level to provide effective, accountable leadership. 3A's simplified governance structure improves financial oversight and transparency, reducing risk of inefficiency. It will support strong partnerships across unitary areas to collaborate on strategic issues, enabling improved service delivery on a pan-Kent basis. This streamlined governance creates a stronger platform for constructive engagement with central government and regional bodies, ensuring alignment on shared priorities.

Option 3A delivers councillor-to-elector ratios that are in line with ratios seen nationally through recent LGR programmes, ensuring democratic accountability and meaningful influence over local services and priorities for councillors and residents

Well-developed governance arrangements and effective structural and policy measures that enhance neighbourhood and community engagement, such as engagement with parish and town councils and the creation of neighbourhood area committees, will provide an ongoing connection to local areas.

Criteria 2: Achieving efficiency, capacity, and financial resilience

Delivering scale to support operational resilience and efficiency	**Criteria 2a and 2b**
Maximising value for money through financial efficiencies	**Criteria 2c**
Managing transition costs while enabling long-term transformation	**Criteria 2d**
Strengthening the financial sustainability of local government	**Criteria 2e**

Delivering scale to support operational resilience and efficiency

Criteria 2a. As a guiding principle, new councils should aim for a population of 500,000 or more

Criteria 2b. There may be certain scenarios in which this 500,000 figure does not make sense for an area, including on devolution, and this rationale should be set out in a proposal

Option 3A creates balanced populations of the recommended size, supporting larger tax bases, lower costs, and economies of scale. It promotes financial stability, efficient service delivery, and the capacity to manage future growth and challenges.

Government guidance on population size

Population size can be used as a proxy for the size and scale of councils.

Government has outlined a population size of 500,000 or more as a guiding principle, not a hard target.

There is recognition there should be flexibility and all proposals, regardless of the population size being proposed, should set out the rationale clearly.

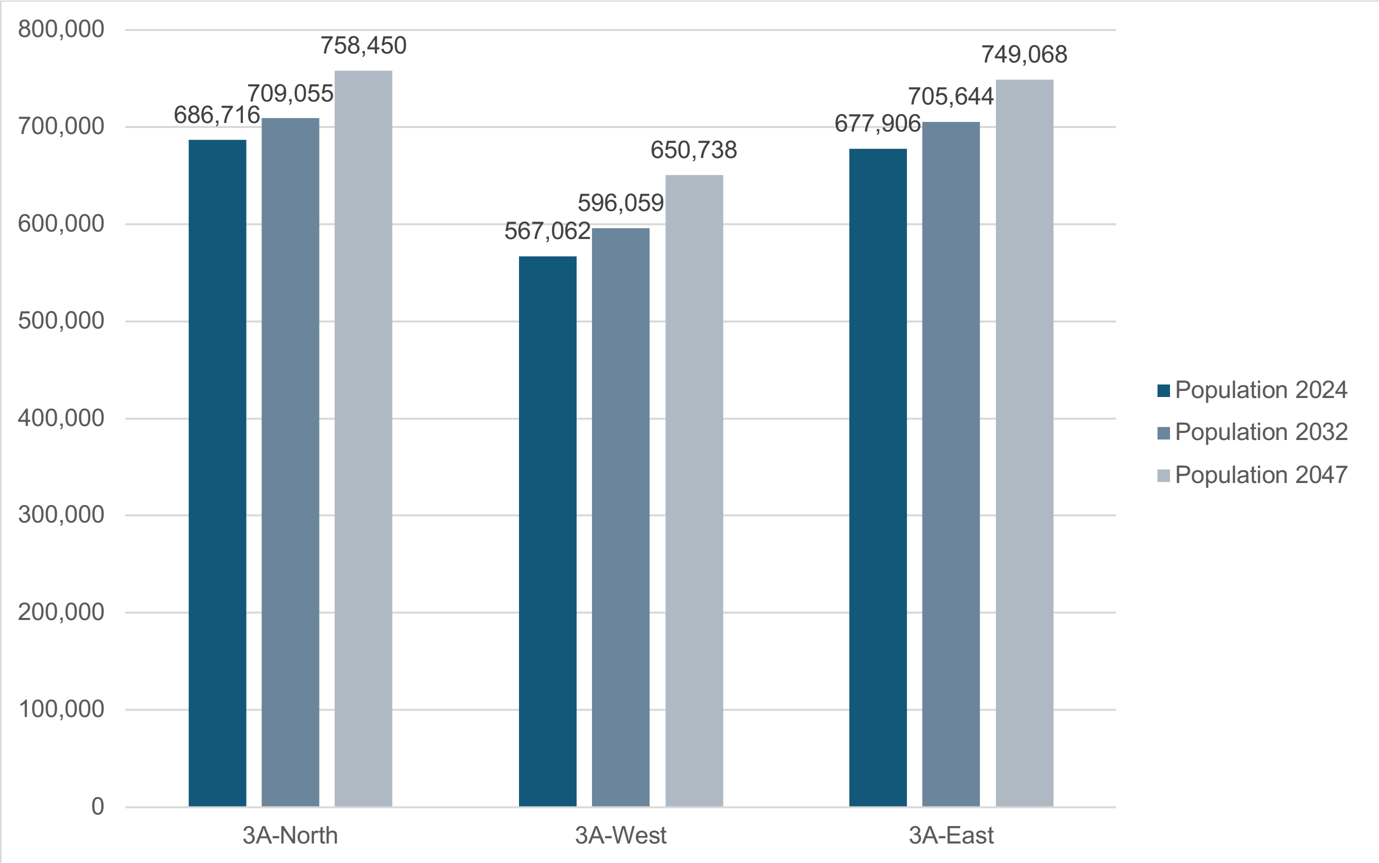
All councils across Kent agree that, given the implementation complexity of any LGR, new local government structures should be in place for generations to come.

As a result, projected future populations as well as current population sizes are considered for each proposed council.

Populations and forward projections

Set out below are population numbers and growth projections for the three proposed councils under Option 3A.

Figure 11: *Population size forecasts (ONS)*



Balanced populations with room for growth: The argument for Option 3A

Under the three-unitary model, each council will have a starting population between 567k – 687k.

This model supports larger taxbases and, in line with the financial modelling, requires lower disaggregation and transition costs while offering greater opportunities for economies of scale.

Of all the options being considered, Option 3A provides the most balanced population distribution, promoting resilience and strategic capacity. Each council is sized to efficiently deliver services, withstand financial pressures, and invest in transformation, while remaining closely connected to local communities. This balance ensures no single council is overburdened, especially in areas with higher levels of need, and that each can attract and retain specialist expertise for the challenges and opportunities of their area.

The model is designed to absorb future shocks and manage demand in high-pressure services such as adult social care and children's services.

Maximising value for money through financial efficiencies

Criteria 2c. Efficiencies should be identified to help improve councils' finances and make sure that council taxpayers are getting the best possible value for their money

Option 3A delivers the strongest value proposition, offering the highest savings, lowest transition costs, and the quickest payback period. It strikes the right balance between efficiency and manageable risk, making it the most cost-effective choice for Kent. This option provides strong foundation for public sector reform and readiness for a devolution deal.

Collaborative working on finance across Kent councils

All 14 S151 officers are members of the long-standing Kent Finance Officer Group (KFOG).

In relation to LGR, it has been responsible for the following key activities:

- developing working relationships and shared understanding of finances, which will be a key enabler of successful LGR;
- informing a shared financial baseline; and
- reviewing and collectively updating assumptions behind a base case model for inclusion in proposals to government.

Approach to modelling the financial impact of LGR

Refer to ***Appendix 2: Financial modelling*** for more detailed description of assumptions, approach and results of the financial modelling.

Finance officers across the 14 Kent councils have reviewed and informed the financial modelling to provide a single financial assessment of models for inclusion in proposals to government.

The financial model aims to:
- quantify the financial impact of the evaluated reorganisation options; and
- compare options on a like-for-like basis, considering savings, costs and payback.

The financial model estimates savings, disaggregation costs and implementation costs calculated with reference to a series of benchmarked LGR business cases, the characteristics of the options being put forward and the characteristics of local government in Kent.

Assumptions in financial modelling

While being fully supportive of the long-term benefits of LGR, all KFOG agrees LGR does not provide the solution combating the scale of the financial challenge being faced.

The model does not consider the impact of local government Fair Funding review and the Business Rate reset.

The KFOG has agreed the following position:

- LGR, while generally expected to be positive for local government finances in the long term, will not solve the cost, demand and associated funding challenges currently being faced. The scope of the financial modelling considers purely the impact of reorganisation, all other things being equal.

- The work carried out at this stage is not a full bottom-up exercise of the financial impact of LGR. Assumptions are based on the past LGR business cases produced to support other areas which have been through the LGR submission process in recent years.
- Due to the size and number of councils in Kent, there is not a fully comparable example of a recent programme to confidently benchmark against. Due to the level of complexity, payback periods in Kent may therefore be longer than some other reorganisations.
- The speed of delivery and level of savings post vesting day of the new councils will largely be determined by decisions already made by the predecessor authorities and those taken by the new authorities. These include decisions in relation to contractual obligations, borrowing, transformation and wider public service reform.
- A range has been applied specifically 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 financial modelling does not take account of how transition costs will be paid for.
- The assumptions in the model have not been tested against actual outturn data for any of the previous local government reorganisation programmes.
- Given the context above, the modelling should not be seen as a set of targets that new councils may be held to account for, as setting the post-vesting day budget will be the responsibility of the new councils.

Financial modelling results

The results of the financial modelling are shown below.

Table 18: *Financial modelling summary results*

LGR option	Implementation costs (one-off) (£m)	Reorganisation savings (gross) (£m)	Disaggregation costs (£m)*	Recurring annual revenue savings (£m)**	Estimated payback period
Option 3A	(127.8)	69.4	(19.7) - (29.2)	40.2 – 49.7	5.4 – 6.7 years

**A range has been applied specifically for disaggregation costs following collaborative discussions around different scenarios for the impact of LGR on commissioned spend across adult and children's social care.*

***Recurring revenue savings = gross reorganisation savings less disaggregation costs*

Option 3A, a three-unitary model built on existing boundaries, has the highest estimated savings of 69.4m and the lowest disaggregation costs and implementation costs of the options modelled, resulting in the shortest estimated payback period of 5.4 – 6.7 years.

Payback period

As shown in the chart below, Option 3A is estimated to pay back within 5.4 years in the positive scenario. The profile of costs and benefits have been developed collaboratively across all LGR options.

Figure 12: *Cumulative financial benefit and payback period by LGR option*

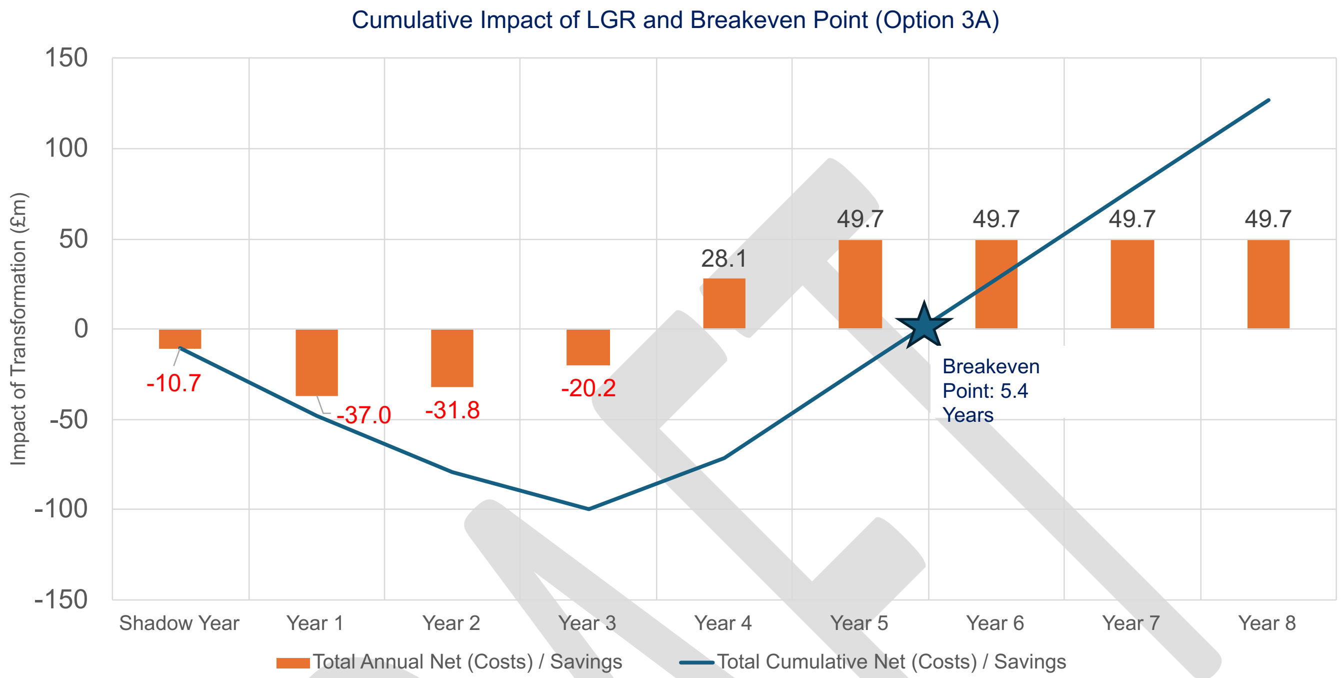


*Chart shows payback period with disaggregation costs at the lowest end of the range

Savings and financial efficiency: the argument for Option 3A

Option 3A offers the strongest value for money among all reorganisation options, achieving the highest savings through scale while keeping implementation and transition costs manageable. By consolidating 14 existing councils into three larger councils (an approach requiring only one additional set of 'upper tier services' for Kent & Medway), it maximises financial efficiencies, reduces complexity, and accelerates the realisation of benefits. These gains arise over-time, primarily from economies of scale, workforce and back-office integration, reduced democratic support costs, and the effective rationalisation of management and support structures.

Maintaining existing boundaries eliminates the need for boundary reviews, which will:
- reduce structural and service disruption.
- minimise implementation risk.
- support organisational stability throughout the change process.

In contrast, options that involve altering boundaries introduce significant additional complexity, requiring extensive consultation, negotiation, and potentially legislative or governance changes. Such changes necessitate detailed financial modelling, redistribution of budgets, reallocation of assets and liabilities, and the renegotiation of service contracts. Collectively, these challenges can extend implementation timelines, escalate costs, and increase the risk of operational disruption.

By having no boundary changes, Option 3A will not be required to undertake these activities and therefore will have considerably less demand on staff time and specialist support, while also preventing additional disruption, uncertainty for future financial planning and avoiding delays in the realisation of anticipated savings. Retaining current boundaries ensures a more efficient and financially stable transition, safeguarding resources and maintaining a clear focus on delivering long-term value and sustainability.

Financial modelling demonstrates that the three unitary model offers clear advantages in affordability and deliverability. Analysis indicates that each additional unitary adds around £5m in implementation costs, covering internal programme management, external consultancy support, public consultation, ICT consolidation, and shadow executive and democratic transition costs. Disaggregation costs also increase, when moving from three to four or five councils. Additionally, the three-unitary model shows greater savings, especially in SEND and children's services. These figures confirm that the three-unitary configuration provides the optimal balance between scale benefits and the cost of change, reflecting a less complex implementation programme with fewer governance and integration demands.

Because of these lower transition costs and higher recurring savings, the three-unitary model achieves the quickest payback period. This ensures that savings are realised sooner and that financial and operational risks during the transition are minimised. Conversely, adding more councils erodes benefits – assumed at a rate of 2.5% for each additional unitary beyond three – while increasing cost and complexity.

Managing transition costs while enabling long-term transformation

Criteria 2d. 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

Kent's LGR process is complex, requiring careful transition management to avoid unnecessary service disruption. The 14 councils are collaborating on plans and see LGR as a chance to transform services through digital innovation, joined-up working, a focus on residents and working with partners to deliver public sector reform under a Strategic Authority. Financially, moving to three councils offers lower transition costs than models with more councils.

A complex transition regardless of the option selected

LGR is inherently complex, and the size and number of councils in Kent means the Kent LGR programme will be one of the most complex implementations nationally, regardless of the option selected.

This has the potential to impact public service delivery in the short term if transition is not managed effectively.

The 14 councils have made progress on transition planning, including considerations of quick wins and capturing of key joint actions. Refer to 'Section 6: Implementation Plan' for further details.

Transition: the argument for Option 3A

As set out in the previous section, transition implementation costs for the three-unitary model are projected to be £127.8m. Whilst any model of LGR has significant complexity, Option 3A minimises transition complexity and by creating three new councils rather than four or five, it has the lowest transition and implementation costs.

Option 3A deliberately avoids changes to current boundaries, meaning that potential delays, significant additional complexity and cost are avoided. Specifically, some models will require the integration of up to seven councils in many of the proposed unitary areas which would lead to significant cost, complexity and risk in terms of aligning policies, contracts, staff terms and conditions, ICT systems and partnerships.

Opportunities for transformation

All councils across Kent have taken steps to modernise, including more effective use of data and introducing digital approaches to service delivery.

This transformation activity has already improved outcomes and enabled cost savings.

However, all councils recognise LGR presents an opportunity to transform services and ways of working more fundamentally.

On 17 September 2025, Kent councils met to discuss the future vision for Kent.

As part of these discussions, the below key ambitions for service transformation were captured:

1. Clear focus for transformation on the needs of residents.
2. Establish a consistent, whole-council approach and culture across services, breaking down silos and joining up the experience for residents accessing multiple services.
3. Digitise and automate resident journeys for more transactional services, while maintaining alternative routes for those who need them.
4. Increase focus on prevention and a more holistic person-centred approach, especially for those with more complex needs (see Criteria 3: Public service reform).

To enable this transformation the below enablers were discussed:

- continual focus on cultural change and effective communications;
- joining up key data sources across services to support seamless working across services, better understand resident needs and achieve better, more proactive decision-making;
- meaningful transformation strategies and wider approach to public service reform in advance of Day 1, informing meaningful corporate plans with clear ambitions and actions; and
- linking transformation to a shared Kent-wide approach to public service reform (see Criteria 3).

Specific transformation plans, including funding arrangements for investment will need to be agreed as part of the budget-setting process and Medium Term Financial Strategy for each new council.

Across Kent, capital receipts are expected to support this to some extent.

However, investment in transformation will be on the basis it delivers cost savings and is therefore self-funding over the medium to long term.

Transformation: the argument for Option 3A

Three councils for Kent will each have the scale and capacity to transform and deliver public service reform in partnership with public sector colleagues, while also working collaboratively at a Kent-wide level where appropriate. This scale enables each council to take a strategic and proactive approach to shared challenges such as housing, transport, climate resilience, and health inequalities, while remaining responsive to local community needs. With greater capacity for innovation, digital transformation, and workforce development, the councils will drive efficiencies and improve outcomes for residents. At the same time, a countywide partnership framework will facilitate coordination on cross-boundary issues like economic development and emergency planning, maintaining Kent's coherence as a unified economic and social system.

Strengthening the financial sustainability of local government

Criteria 2e. For areas covering councils that are in Best Value intervention and/or in receipt of Exceptional Financial Support, proposals must additionally demonstrate how reorganisation may contribute to putting local government in the area as a whole on a firmer footing and what area-specific arrangements may be necessary to make new structures viable

The Kent financial context

None of the 14 councils in Kent are in Best Value intervention or in receipt of Exceptional Financial Support.

However, Medway Council has been granted a capitalisation direction under the government's Exceptional Financial Support.

There is collective concern regarding the financial sustainability of the current system, particularly given rising demand in adult social care and children's services, rising costs and increasing levels of debt.

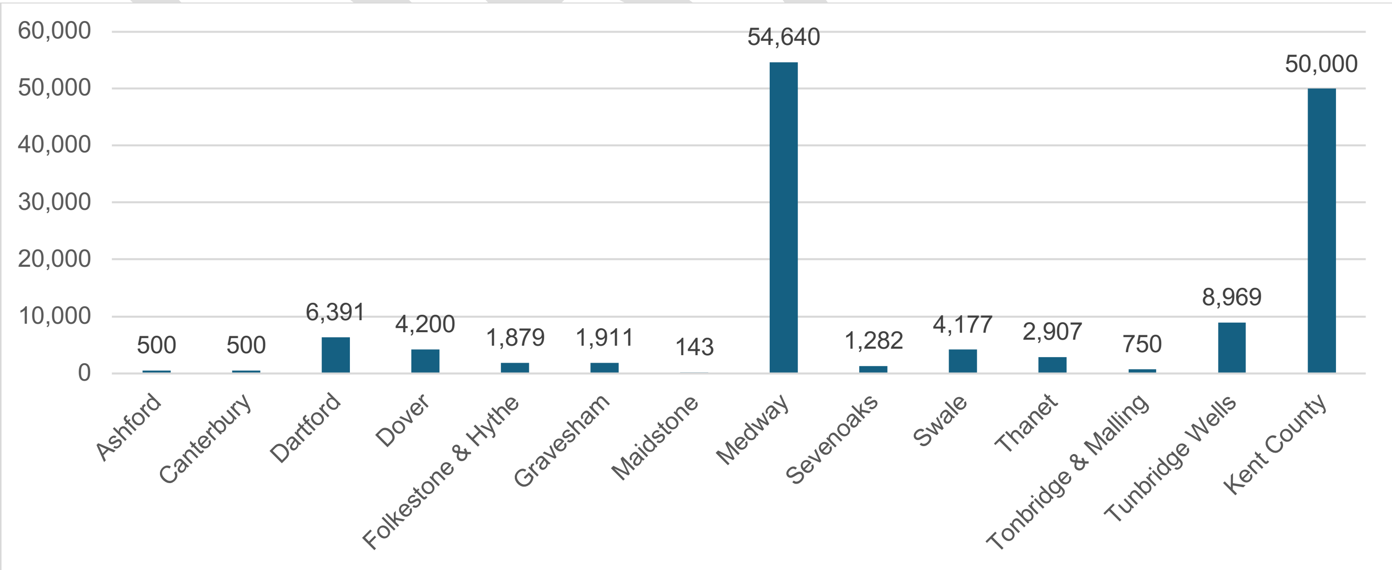
The current two-tier system contributes to inefficiencies through duplication in democratic arrangements and overlaps in service delivery across county and districts.

Existing budget challenges

The forecast total gross budget gap, including assumed funding from reserves, for all councils by 2028/29 is £138.2m, which includes £54.6m within Medway and £50.0m within Kent County Council.

These figures exclude consideration of the impact of Fair Funding 2.0.

Figure 13: *Budget Gap (FY28/29) (£'000)*



All existing councils will continue to focus on delivering savings and managing their ongoing budget gaps regardless of LGR.

However, the starting point for all new councils is expected to be stretched, with ongoing need for savings to be identified.

Projected budget position for new councils under Option 3A

Local Authority	Budget Gap (FY28/29) (£m)
North Kent	84.9
West Kent	25.8
East Kent	27.5
Total	**138.2**

The total projected budget gap position for Option 3A is £138.2m. The budget gaps in West and East Kent are balanced against each other, while North Kent's gap is proportionally larger, though a significant portion of this is attributable to Medway.

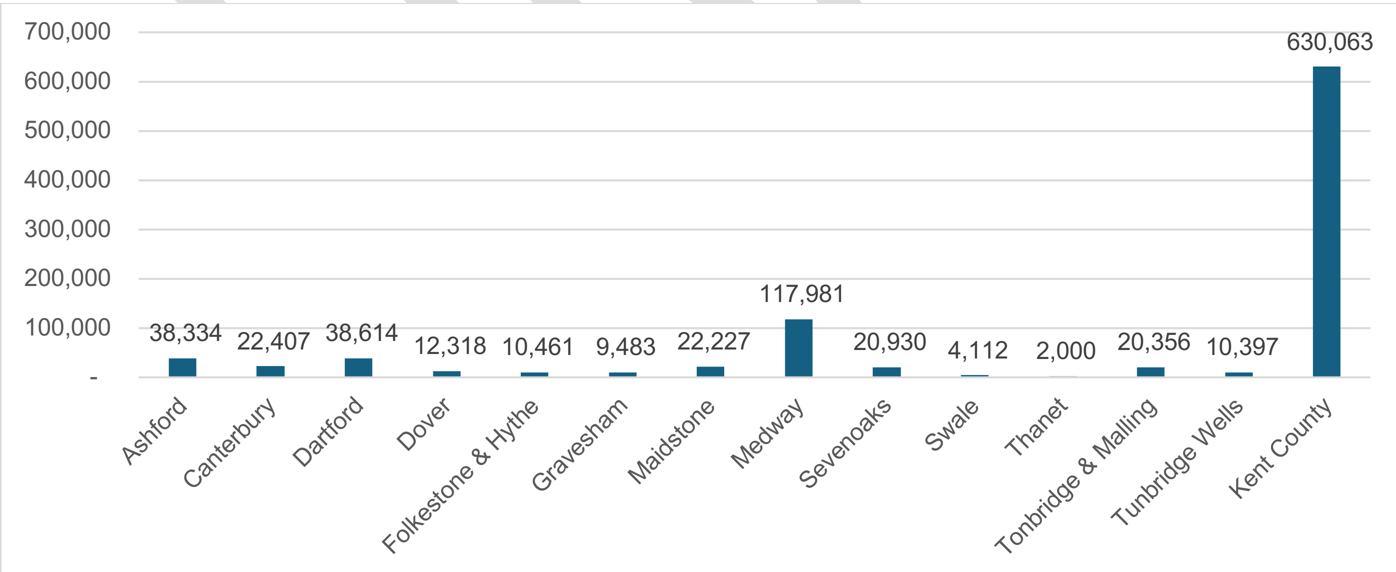
Despite the difference between North Kent and the other two councils, it is important to consider the relevance of scale in assessing financial sustainability. The formation of a new, larger North Kent authority would enable greater financial resilience. This consolidated council would benefit from a broader revenue base and enhanced capacity to absorb financial pressures, offering a more robust fiscal position than the current fragmented arrangements.

Current reserves levels

Across Kent councils, Total Usable Reserves are forecast to be £959.7m.

This includes the full value of the Kent County Council's usable reserves of £630.1m.

Figure 14: *Total Usable Reserves (FY28/29) (£'000)*



Note – for all districts, this amount related to General Fund balance, Earmarked Reserves, Capital Receipts Reserve and Capital Grants Unapplied.

Further discussions will be needed to decide the basis for allocation of county reserves across the new councils post reorganisation.

It will be the decision of each new council to determine how to use its resources to pay for the cost of reorganisation, which is likely to be through a mixture of use of reserves and capital receipts.

Projected reserves levels under Option 3A

Local Authority	Total Usable Reserves (FY28/29) (£m)
North Kent	394.2
West Kent	258.9
East Kent	306.6
Total	**959.7**

All unitary authorities have healthy reserves levels above £250m and are all relatively balanced, in the range of £259m to £394m.

Existing council debt

The external debt position reported across all Kent councils is £1.7bn on a net revenue of £2.3bn with a total financing cost of £123.6m. 67% of the borrowing and 87% of net revenue and 87% of the financing cost is within Kent County Council and Medway.

The combined financing ratio across all Kent councils is 5.3%.

Table 19: *Borrowing and financing costs across Kent councils*[30]

Local Authority (£'000) (26/27)	General Fund Borrowing (External)	Financing cost	Net Revenue	Financing ratio
Ashford	95,375	402	9,009	4.5%
Canterbury	120,358	5,417	31,800	17.0%
Dartford	-	370	21,531	1.7%
Dover	102,600	1,424	20,088	7.1%
Folkestone & Hythe	53,000	2,628	35,504	7.4%
Gravesham	101,955	2,777	25,693	10.8%
Maidstone	65,000	4,183	27,945	15.0%
Medway	442,468	21,731	481,631	4.5%
Sevenoaks	13,934	1,040	21,868	4.8%
Swale	13,000	2,802	31,400	8.9%
Thanet	6,622	371	26,749	1.4%
Tonbridge & Malling	-	-	27,346	0.0%
Tunbridge Wells	-	529	21,535	2.5%
Kent County Council	716,039	79,890	1,531,280	5.2%
Total	**1,730,351**	**123,573**	**2,313,379**	**5.3% (Average)**

[30] Financial data return submitted by councils

The projected debt position for new councils under Option 3A

The District borrowing costs, net financing costs and net revenue have been combined and the County costs have been apportioned based on population data.

Local Authority (£'m) (26/27)[31]	General Fund Borrowing (External)	Financing cost	Net Revenue	Financing ratio
North Kent	812.0	56.1	1,104.6	5.1%
West Kent	289.1	29.2	548.2	5.3%
East Kent	629.2	38.3	660.5	5.8%
Total	**1,730.4**	**123.6**	**2,313.4**	**5.3%**

North Kent shows the highest level of external borrowing at £812 million, which corresponds with its substantial net revenue of £1,104.6 million. Despite this large borrowing figure, its financing ratio is the lowest among the three at 5.1%, suggesting a relatively efficient debt servicing capacity. West Kent, as the smallest council, has the lowest borrowing (£289.1 million) and net revenue (£548.2 million). East Kent has the highest financing ratio at 5.8%, which may point to slightly less favourable financing terms or a tighter revenue position.

While the financing ratios for each council show some variation, they are all relatively close – falling within a narrow band of less than one percentage point. This suggests that, despite differences in borrowing levels and net revenue, the overall debt servicing burden is fairly consistent across the three proposed councils.

Three councils driving long term financial sustainability

The scale of the three unitary authorities offers greater resilience to financial shocks, as their larger economic and fiscal bases provide enhanced stability and capacity to absorb unexpected financial pressures. When examining key financial metrics for the three unitary areas – North, West, and East – there is a reasonable balance across key metrics.

Total GVA is balanced across all councils, ranging from around £17 billion to £20 billion, while GVA per capita figures are also comparable, especially between the North and East. Council tax bases are also fairly consistent, with all councils sat around 226k to 246k. Average council tax band D rates are closely aligned across the board. Retained business rates and general fund balance peak in the North at £138 million and £68.7m respectively, though in general all three areas are balanced, especially between West and East. Net revenue expenditure varies, with the North spending the most at £833 million and the West the least at £651 million.

Due to the larger sizes of each unitary, the 3A model is most able to achieve economies of scale in areas such as procurement, staffing, IT, HR, and infrastructure to reduce duplication. Additionally, scale and capacity can also enable greater opportunities for transformation and digital investment.

[31] Financial data return submitted by councils

Taken together, these figures suggest that each future unitary authority will maintain a sound financial balance and will have the capacity to manage resources effectively, with their scale and economic strength contributing to long-term financial sustainability and resilience.

Table 20: *Key financial metrics for the 3 unitary option*

Metric	North Kent	West Kent	East Kent
Total GVA (£ million) (2023)[32]	17,839	20,168	16,958
GVA per capita (£) (2023)[33]	25,977	35,566	25,015
Council tax base (number of band D equivalent properties) (FY28/29)[34]	225,749	231,972	245,804
Council Tax band D average (exc. Fire, Police and Parishes) (£)[35]	1,842	1,904	1,907
Retained Business Rates (£m) (2024-25)[36]	137.7	113.2	113.7
General fund balance (FY28/29) (£m)[37]	68.7	59.8	58.0
Net revenue expenditure (£m)[38]	833.2	651.0	789.6

[32] Regional gross domestic product: local authorities - Office for National Statistics
[33] Regional gross domestic product: local authorities - Office for National Statistics
[34] Financial data return submitted by councils
[35] Financial data return submitted by councils
[36] National non-domestic rates collected by councils in England: forecast 2024 to 2025 - GOV.UK
[37] Financial data return submitted by councils
[38] Financial data return submitted by councils

Criteria 3: Delivering high-quality and sustainable public services

This section includes:

Improving delivery of key services	**Criteria 3a and 3c**
Public service reform	**Criteria 3b**

Improving delivery of key services

Criteria 3a. Proposals should show how new structures will improve local government and service delivery, and should avoid unnecessary fragmentation of services

Criteria 3c. 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.

Ensuring the delivery of high-quality, sustainable services – particularly in areas such as adult social care, children's services, SEND, homelessness, and wider public safety – stands at the heart of the future vision for local government in Kent.

Working together on the future of services

As part of the Kent LGR programme, the 14 councils have collectively agreed key service areas to explore in more detail through workshops, supplemented by additional discussions and data gathering.

Workshops were held in five key service areas, bringing together representation from across the councils of Kent and Medway to ensure multiple perspectives were shared.

These services were:

- Adult Social Care;
- Children's Services including Special Educational Needs and Disabilities (SEND) and Unaccompanied Asylum Seeking Children (UASC);
- Housing and Homelessness;
- Highways Services; and
- Waste Services.

During these sessions, attendees considered the following:

- current service challenges;
- existing good practice and collaboration;
- future improvement opportunities shared across all LGR options; and
- opportunities and challenges specific to individual options where a proposal is being submitted to government.

In addition to the sessions held, colleagues from a wide range of services across Kent have had the opportunity to input to collective thinking on service-specific impacts through online forms with in excess of 125 responses.

There were a number of emerging themes and these were aligned with workshop discussions where the same themes were consistently identified.

We are continuing to engage with colleagues across the councils.

Challenges of two tier working	How single tier working can improve performance and customer outcomes

- **Service fragmentation:** Services split between county and district councils cause confusion over responsibilities, leading to resident frustration and delays.
- **Coordination and communication issues:** Lack of shared systems and contacts between tiers results in slow responses and missed opportunities.
- **Duplication of effort:** Overlapping services between councils waste resources and confuse residents with inconsistent messaging.
- **Strategic misalignment:** Differing priorities and leadership across tiers hinder cohesive planning and policy alignment.
- **Limited access to expertise and resources:** Smaller district teams often lack specialists and face challenges in recruitment and timely support.
- **Inconsistent service standards:** Variations in budgets and policies across districts lead to unequal service quality for residents.
- **Funding and commissioning challenges:** Fragmented funding and commissioning processes reduce flexibility and limit district influence over county decisions.

- **Consistent and integrated services**: Uniform standards and joined-up support for complex needs reduce disparities and improve outcomes for all residents.
- **Faster decision-making**: Simplified governance structures allow quicker, more coordinated responses and clearer responsibilities.
- **Efficiency gains**: Streamlined processes and reduced bureaucracy lead to cost savings and faster service delivery.
- **Strategic alignment**: Unified leadership and planning enable coherent strategies and better prioritisation across services.
- **Optimised resources**: Shared staffing and expertise increase flexibility, resilience, and effective demand management.
- **Enhanced data sharing**: Integrated systems improve planning, monitoring, and decision-making through better access to information.
- **Improved performance management**: Clear accountability and consistent use of key performance indicators (KPIs) enhance service monitoring and impact tracking.
- **Simplified customer access**: A single point of contact eliminates confusion, ensuring easier navigation and fewer misdirected queries.

Our shared view across Kent is that LGR must be the catalyst for fundamental reform in how we deliver our services, how we work with our partners and how we deliver for all communities.

From the engagement with services to date, it is clear there are opportunities to enhance service delivery by building on areas of good and innovative practice, alongside opportunities to operate differently post-LGR.

Initial discussions are the first steps in designing future service provision and we are committed to building on the momentum of our service specific workshops as we progress with reorganisation.

Pan-Kent working

There are functions and services which will be best delivered across Kent. This minimises the disruption from disaggregation but is driven by considering what the best geographic footprint and operating model for delivery of those services is.

A strategic authority across Kent and Medway provides a real opportunity to strengthen Kent as a whole and to focus the role of unitary authorities on their delivery role. The strategic authority will take a strategic role across Kent including:

- transport and infrastructure, including the Local Transport Plan and management of critical national infrastructure including the port at Dover and Eurotunnel at Folkestone;
- economic development and regeneration, including the Local Growth Plan;
- housing and strategic planning, including the Spatial Development Strategy;
- adult education, skills and job support;
- the environment and net zero;
- health including the ICB, wellbeing and public service reform; and
- the Police and Crime Commissioner and fire and rescue functions.

There are also services and organisations that operate across Kent that our approach to LGR would not disrupt including Adoption Partnership South East, Safeguarding Adults Board, elements of commissioning, Attendance Alliance for Kent and Medway, Kent Housing Group and Kent Resources partnership.

While not tying future councils into service delivery model decisions, we are supportive of partnership arrangements and other approaches that enables strategic functions, services and operations to be delivered across Kent where it is in the best interests of residents to do so.

The key service arguments for Option 3A

Minimising fragmentation and gaining capacity

A three-unitary model offers a compelling framework to deliver more coherent, efficient, and forward-looking public services. By reducing fragmentation across existing structures, this model will create organisations with the scale and capacity to invest in meaningful service transformation, while still maintaining a strong local focus. Retaining existing council boundaries further simplifies governance arrangements and significantly reduces the risk of service disruption during transition, compared with options involving multiple boundary changes. Avoiding boundary changes will lead to more streamlined service delivery arrangements, with clarity on funding allocations, and provide certainty for staff and stakeholders.

The creation of three strategically designed unitary authorities will help to align resources and expertise across broader geographies, enabling more consistent standards of delivery and reducing duplication in management, commissioning, and support functions. This provides a platform for greater integration and partnership working with health, education, voluntary, and private sector partners, driving a more coordinated approach to meeting the needs of residents and communities.

Achieving strategic balance and scale

The balance achieved through a three-unitary model will also help to manage differing levels of demand across the county, ensuring that no single council is disproportionately affected by demographic pressures or localised challenges. In particular, the model achieves a balance across deprivation levels, the number of adults and children in social care, our older adults' population, and registered pupils with SEND. This structure allows for economies of scale where they are most beneficial, such as business support services, digital transformation, workforce development, and strategic commissioning, while retaining the flexibility for local responsiveness and engagement. By aligning service planning and delivery across larger, more resilient organisations, councils can better tackle cross-cutting issues like workforce recruitment, sustainability, and cost pressures. It will also strengthen strategic capacity across the system, supporting long-term planning, innovation, and investment in prevention rather than reactive intervention.

Strengthening collaboration and joint working

Congruence with the existing operating geographies of other public services including for health and policing maximises the potential, efficiency and effectiveness of the key convening role for local councils – this is more straightforward where geographies are congruent or closely aligned.

Our approach recognises that many of Kent's most complex challenges do not stop at district boundaries and require joint solutions that reflect residents' real experiences. In doing so, Option 3A would not only simplify governance and partnership working but also strengthen the collective ability of local government in Kent and Medway to deliver equitable, high-quality services that make the best use of public resources.

Adult Social Care and Children's Services spend data

During the Options Appraisal, analysis was carried out of the actual cost incurred by different councils for key county-wide services.

This was led by KCC and tested with finance officers across Kent.

It found:

- for all of the multi-council options being put forward there is significant misalignment between the costs of delivery and the funding provided for both adult social care and children's services, with some areas at more of a disadvantage than others.
- the impact of the Fair Funding Review has been considered and is expected to have some impact on funding allocation, but based on analysis to date, misalignment between costs and funding is expected to continue for any multi-council model.
- this disparity is important for all councils across Kent to be aware of and to take appropriate mitigating steps in LGR planning. The potential to share funding appropriately based on actual demand and costs is an opportunity for discussion.

Funding and expenditure

Table 21: *Total expenditure on Social Care*

Total Expenditure *(based on 23/24 spending)*[39]	**North Kent**	**West Kent**	**East Kent**
Children's Social Care (£m)	202.8	162.3	269.0
Adult Social Care (£m)	152.4	43.8	101.8

Adult Social Care (ASC)

[39] Local authority revenue expenditure and financing England: 2023 to 2024 individual local authority data - outturn - GOV.UK

Overview of current ASC delivery

Kent County Council and Medway Council deliver adult social care as part of their existing responsibilities with some place-based partnerships in place across the existing councils to bring integrated teams together to understand the needs of the population, agree plans to meet those needs and implement solutions.

Kent and Medway Integrated Care Board oversees strategic planning and resource allocation for health and care services.

Delivery is planned and co-ordinated on the footprint of four health and care partnerships which bring together health providers, social care, public health, district councils and the Voluntary, Community, Faith and Social Enterprise (VCFSE) Partnership for Better Health.

Kent County Council and Medway Council have a history of working together to great effect, with examples including:

- The Kent and Medway Safeguarding Adults Board: a multi-agency partnership consisting of statutory and voluntary partner organisations, working together to keep adults at risk of abuse or neglect safe.
- The Kent and Medway Violence Reduction Unit (VRU): a partnership between the police, councils, health service providers and other key agencies to deliver a reduction in violence the county.

Evidence of shared posts demonstrates how working together across councils can build resilience, provide flexibility, offer value for money and deliver good outcomes.

Case study – Joint Commissioning Post – Learning Disability and Autism

The Kent and Medway Learning Disability and Autism Delivery Partnership was formed in January 2022.

It was established after a review of previous commissioning and alliance arrangements highlighted the need for a new whole-system approach.

This approach aims to improve health outcomes and maximise choice, control, independence and human rights for citizens with learning disabilities, autism or both.

In September 2023, NHS Kent and Medway and Kent County Council formed a legal partnership to jointly plan and commission services for neurodivergent citizens.

This Partnership for Neurodiversity Agreement allows for delegated functions under section 75 of the NHS Act (2006) if deemed necessary.

This agreement is further supported by a memorandum of understanding between Kent County Council, representing the partnership, and Medway Council, which aims to explore a tripartite agreement and facilitate discussions on resources for neurodivergent individuals in Kent and Medway.

The System Programme Lead is a pivotal role established in August 2022, focusing on senior system leadership and comprehensive programme management.

This position is instrumental in fostering collaborative improvement, working with various partners to design and implement projects aimed at enhancing the health, wellbeing and life chances of individuals with learning disabilities and autistic people across Kent and Medway.

Effective and sustainable delivery of Kent and Medway's Learning Disability and Autism programme is ensured through collaboration and whole-system leadership, underpinned by securing commitment from essential stakeholders across health, social care and the third sector.

LGR provides the opportunity to consider strategically how shared services and posts across the future councils can enhance delivery.

Key ASC delivery challenges

CQC inspections in 23/24 across Kent and Medway rated both as Requires Improvement.

The strengths and areas for improvement included:

- for Kent County Council strengths included co-production and lived experience, improved hospital discharge, high demand management and staff development. Areas of focus included communications and information, transitions, delays in support and staff morale.
- Medway Council strengths included positive staff interactions, person-centred support, effective transitions and partnership working. Areas of focus included accessibility of information waiting times, service gaps and staffing challenges.

Given the differences highlighted there is an opportunity for KCC and Medway ASC teams to share learning and areas of good practice in preparation for LGR.

Additional challenges include:

- **Demographic and geographical challenges:** more than one-fifth of Kent's residents are aged 65 and above (20.5%), a higher proportion than Medway's 17%, and this demographic is expected to grow considerably by 2040.
- Areas of deprivation exist across Kent, particularly in eastern Kent. Coastal regions face specific difficulties, including economic precarity, geographical remoteness, and the complexities of service provision.
- **Funding shortfalls and financial strain:** budgets are insufficient to meet the rising demand and complexity of care needs, leading to difficult decisions and financial pressure on the entire system.
- **Workforce crisis:** difficult to recruit and retain enough care staff with specific challenges in Kent due to geography (coastal) and competition from neighbouring councils, alongside shortages in specialist roles like Approved Mental Health Professionals.
- **Rising and complex demand:** an increasing number of older adults with multiple health conditions, plus more younger adults with complex disabilities, means services are stretched by growing and more intricate care needs.
- **Fragile care market:** the local market of care homes and home care providers is unstable and inconsistent.
- **Fragmented health and social care:** despite efforts, integrating NHS health services with council social care remains difficult, causing disjointed care pathways, delayed hospital discharges, and gaps in support.
- **Poor data and system integration:** information sharing across different services and partners is complex and fragmented, hindering effective coordination, strategic planning and the ability to gain insights from data.
- **Policies:** differing local policies, procedures and ways of working across the area can lead to different cultures across localities resulting in inconsistent experiences for people accessing services.

Future ASC delivery and opportunities through LGR

Regardless of the geographies of future councils, we are committed to transforming adult social care by:

- **Improved, innovative service delivery:** developing and implementing new models of delivery based on best practice.
- **Fostering collaborative partnerships:** strengthening meaningful collaborations across Kent to achieve improved outcomes for all residents.
- **Strategic housing integration**: adopting a unified, strategic approach to the planning and co-ordination with housing services across the wider footprint to achieve closer alignment of these services for the benefit of adults needing support, reduce inequalities and prevent escalating need.
- **Streamlining data and systems:** enhancing data sharing and analytics through integrated systems to drive insights and improve service delivery.
- **Building workforce resilience:** exploring shared service models and new approaches to strengthen the social care workforce and ensure its sustainability.
- **Optimising commissioning:** implementing a strategic, Kent-wide commissioning approach where appropriate to better shape and influence the market, delivering enhanced outcomes and improved value for money.
- **Localising care provision:** ensuring services are delivered closer to home, with a deeper understanding of communities and individual needs.

Adult Social Care delivery under Option 3A

All Kent LGR proposals are based on a common dataset which supports understanding of current delivery, cost and demand pressures across key services.

The table below shows key data, modelled for the three councils making up Option 3A.

Table 22: *Adult Social Care Metrics*

Metrics	North Kent	West Kent	East Kent
Total Population Size (mid 2024)	686,716	567,062	677,906
People aged 18 and over with Learning Disabilities accessing short term support during the year, rate per 100,000 population (2024-25)	18	18	43
People aged 18 and over with Learning Disabilities accessing long term support during the year, rate per 100,000 population (2024-25)	261	210	354
People accessing short term support during the year, rate per 10,000 population (18-64) (2024-25)	27	30	58
People accessing short term support during the year (65+), rate per 100,000 (2024-25)	341	328	400

People accessing long term support during the year (18-64), rate per 100,000 population (2024/25)	56	44	71
People accessing long term support during the year (65+), rate per 100,000 population (2024/25)	438	326	392
Safeguarding Concerns Received, rate per 100,000 population (2024/25)	1,415	1,444	1,985
Safeguarding Concerns Commenced, rate per 100,000 population (2024/25)	465	512	683

Key points in relation to the data:

The data seeks to identify at a high level the indicative demand on the system. This will enable further service delivery planning in the future to manage more effectively the peaks across the system.

- A theme of the metrics above is that demand in East Kent is consistently higher than in North Kent and West Kent.
- There is one metric where East Kent does not face the most demand, which is in People (65+) accessing long term support. North Kent faces the most demand in this area which reflect the age profile of the region.
- In two metrics, People aged 18 and over with Learning Disabilities accessing short term support and People accessing short term support (18-64), East Kent makes up over 50% of total demand.

<u>Opportunities for Adult Social Care delivery under Option 3A</u>

- There is an opportunity to manage demand in coastal areas, as the East Kent council aligns areas and towns facing similar pressures.
- Building on this the three unitary authority model provides the framework for councils to align services against key priorities for their areas, such as North Kent building an approach that reflects People (65+) accessing long term support as an area of demand for them.
- While East Kent experiences higher demand, the social care budget will be allocated proportionally to reflect varying needs across regions. The region is large enough to leverage economies of scale and manage market pressures effectively yet remains sufficiently flexible to respond to local needs as the unitary with the highest demand.
- Option 3A also aligns with acute heath and overall health economy boundaries which will enable a whole system approach between social services and health partners. NHS Kent and Medway in their consultation response have highlighted the risks and benefits from Local Government Reorganisation including: “As demonstrated in our recent Kent and Medway NHS Strategy our aim is to concentrate resources on frontline services, with a focus on sustainable and community care. On this basis **our preference would be for the smallest number of unitary councils to minimise infrastructure costs and the risk of fragmenting services**. Whilst acute healthcare service geographies are relatively fixed in their nature, the partnerships in which we operate offer potential for future alternative alignment with other public sector organisations”.
- Disaggregation costs are expected to be lower under the three-unitary model compared to more fragmented alternatives, enabling the earlier delivery of more integrated and higher-quality services.

In general, Option 3A creates a balance between having the scale to address challenges and the ability to remain community centric. Maintaining existing boundaries and being so well aligned to those of key service delivery partners will only help in this effort.

Children's Social Care

<u>Overview of Children's Social Care current delivery</u>

Kent County Council and Medway Council currently deliver children's social care services with positive Ofsted recognition.

The current delivery of services is an excellent foundation for LGR and provides the opportunity to learn from each other.

Kent County Council, covering a large and diverse region, achieved an Outstanding rating from Ofsted in November 2021.

This reflects consistently high-quality social work, strong leadership and significant positive impacts on children and families, particularly in early help, child protection and support for looked-after children.

Medway Council, serving a more concentrated urban area, was rated Good by Ofsted in July 2023.

This rating acknowledges effective leadership, sound social work practice and positive outcomes for children.

Medway's success is attributed to robust multi-agency partnerships and a commitment to early intervention, demonstrating a stable and responsive service model.

The rating demonstrates the transformation journey that Medway has been on.

Delivering effective and impactful children's services cannot be done in isolation and partnership working are critical.

Whatever tools, enablers or metrics you use, there is an undeniable and fundamental need for excellent leadership, clarity of vision and values, a culture of high support and high challenge, adequate resourcing and a resilient workforce to deliver day-in, day-out.

There are multiple examples which demonstrate how services are already being delivered innovatively across organisations.

- KCC has operated Out Of Hours (OOH) services for Medway since 2014, with the current contractual arrangements being in place since April 2023. The service covers between 5pm and 7am, Monday to Friday and weekend and bank holidays and results in effective delivery and value for money. This arrangement works well, with good levels of open communication between managers. Inspection feedback regarding OOH work for Medway has always identified effective service delivery and good to outstanding practice. There is no reason why this approach could not be replicated across the Kent and Medway footprint going forward.

- The Attendance Alliance for Kent and Medway is a regional initiative, working in partnership with the Department for Education (DfE), to share good practice and develop new strategies for improving school attendance.

Case study - Adoption Agency South East

Adoption Partnership South East (APSE) is a Regional Adoption Agency (RAA) delivering adoption services for three local authorities - the London Borough of Bexley, Kent County Council and Medway Council. It was launched on 1 November 2020. Kent County Council remains the host local authority.

RAA's 2023 Three-Year Plan focuses on building a supportive adoption community.

Its mission prioritises securing permanent homes for children and providing comprehensive support to all affected by adoption.

Since its inception, RAA has encouraged innovation and collaboration across several key areas.

These include innovative projects funded by the Department for Education, development of the adoption community, training and practice enhancement, and comprehensive adoption support services.

RAA has also focused on adopter recruitment to achieve permanency for children and has implemented mechanisms for feedback and continuous improvement.

The RAA has allowed a localised service to operate across a regional footprint to the best advantage of providing permanence to children.

The principles of this approach with a host authority can be explored further across the future unitary authorities.

Key Children's Services delivery challenges

- **Workforce instability:** a national shortage of qualified social workers, leading to recruitment and retention difficulties, reliance on agency staff and higher caseloads that impact continuity and quality of care.
- **Rising and complex demand:** services are under pressure from a growing number of referrals, often involving highly complex issues.
- **Placement shortages:** securing enough suitable and stable placements for looked-after children is a critical challenge, particularly for older children, sibling groups and those with complex needs, often resulting in out-of-area placements and increased costs.
- **Limited specialist support:** access to timely and appropriate specialist services, such as Child and Adolescent Mental Health Services (CAMHS), is difficult, leaving social care teams to manage complex emotional and behavioural needs.
- **Socio-economic impact:** areas of deprivation in both Kent and Medway contribute to child welfare concerns, with poverty, poor housing and family stressors increasing the demand for social care intervention.
- **Inconsistent thresholds:** differing thresholds for intervention across services and partner organisations can create confusion and make navigation difficult for families and professionals alike.
- **Special Educational Needs and Disabilities:** The SEND system including funding through the high needs block continues to face significant national and local challenges. This includes

rising demand, increasing complexity, sufficiency of provision, capacity and capability gaps in relation to SEND specialists and educational psychologists and scale and complexity of the partnership landscape.
- **Unaccompanied Asylum-Seeking Children (UASC) pressure**: the presence of UASC, particularly in Dover and the wider area, places significant strain on multiple services, including housing, with varying policies for their support.
- **Out-of-Area Placements (OOAP)**: both councils, especially Medway with its high per capita rate, face a major challenge from children placed by other local authorities, impacting housing, children's homes and foster care capacity.
- **Improving prevention:** while good social care practice exists, there is a shared need to enhance preventative services to intervene earlier and reduce the escalation of needs to statutory services.

Case study - Unaccompanied Asylum Seeking Children

Kent faces a unique and profound challenge as a primary entry point for unaccompanied asylum-seeking (UAS) children, a direct consequence of its proximity to mainland Europe.

The county's UAS Children's Service holds comprehensive responsibility for the care and accommodation of these newly-arrived children, providing support until they are transferred to another local authority under the National Transfer Scheme (NTS) or integrated into Kent's mainstream Child in Care Services, where support continues until they reach eligibility limits or are advised to return to their country of birth.

Since January 2016, more than 10,000 UAS children have arrived in Kent, necessitating a substantial expansion of services.

This now includes 10 reception centres and increased social work teams dedicated to assessment and placement.

Crucially, the timely transfer of these children is vital for maintaining sufficient accommodation capacity within Kent.

This ongoing demand on the system and associated services is significant and will continue beyond LGR, representing a unique and disproportionate pressure not experienced by other areas across the UK.

Future Children's Social Care delivery and opportunities through LGR

We are committed to continuing to transform children's services through LGR. Taking learning from across the area and delivering across the new councils.

- **Evolving best practice:** developing and putting into practice new ways of delivering care rooted in the best approaches for children and families.
- **Streamlined service delivery:** reducing complexity in delivery, for example, by consolidating current community service partnerships from 14 to enhance efficiency.
- **Leveraging convening power:** utilising our unique position to foster stronger partnerships and collaborations across the system.
- **Holistic place-based prevention:** adopting a comprehensive approach to prevention through multi-agency teams and neighbourhood working.

- **Community-centric approach:** ensuring local needs and cultures are deeply understood to influence and tailor delivery approaches.
- **Child and young person-led system:** placing the voice of our children and young people at the heart of our whole system approach, with stronger ownership and engagement from families and schools.
- **Strategic financial redesign:** designing new service budgets to optimise resource allocation, rather than relying on existing financial structures.
- **Building workforce resilience:** exploring shared service models and innovative approaches to strengthen the social care workforce and ensure its sustainability.
- **Unified housing provision:** implementing a simplified and unified approach to housing and planning to build market capacity at a local level.
- **Integrated early help pathways:** reducing duplication and improving visibility of risk across agencies.

Case study - Special Educational Needs and Disabilities SEND

In recent years, Medway Council has transformed its delivery of Special Educational Needs and Disabilities (SEND) services, driven by a commitment to accountability and collaborative commissioning.

By engaging with partners across the system, fostering a culture of shared responsibility, and holding providers to account, Medway has moved from a £24 million deficit to a balanced budget.

This strategic financial management, coupled with a high-trust-high-challenge mantra for providers, has enabled the development of more local provision and a transparent funding model, ensuring resources are effectively directed to where they are most needed.

Core to this success lies in an embedded cultural change, uniting stakeholders and particularly bringing schools around the table to address issues and problem-solve together. This approach has fostered a powerful sense of collective responsibility, resulting in a system where schools actively challenge each other, develop new initiatives and have significantly increased the proportion of EHCPs managed within mainstream settings from 26.4% to 35%.

This cultural shift is further reinforced by robust quality assurance, ensuring all provision meets high standards and is responsive to children's needs.

The size of Medway has proven to be a distinct advantage, enabling rapid change and full oversight of the entire SEND system.

This agility allows for the co-production of teams, personalised responses for complex cases and a deep understanding of families and social workers within the community.

With strong parent/carer involvement, locality-focused initiatives and a commitment to embedding accessibility policies, Medway has not only achieved significant financial stability but has also cultivated a happier, more integrated team and a highly responsive, accountable and inclusive SEND service that truly knows and supports its children.

The proposed options are in relation to smaller scale, multiple councils where this approach and learning could be applied.

Children's Social Care delivery under Option 3A

All Kent LGR proposals are based on a common dataset which supports understanding of current delivery, cost and demand pressures across key services.

The table below shows key data, modelled for the three councils making up Option 3A.

Table 23: *Children's Social Care Metrics*

Metrics	North Kent	West Kent	East Kent
Active Education Health and Care Plans (EHCPs) by School District, rate per 10,000 (Oct 2025)	381	339	436
Not in Education, Employment or Training (NEET) Y12&13, rate per 10,000 (2024)	385	283	370
Child in Need (CiN) Plans, rate per 10,000 (Mar 2025)	93	62	103
Child Protection Plans (CPP) Rate per 10,000 (Mar 2025)	92	65	104
Looked After Children (LAC) by placement address, rate per 10,000 population (Mar 2025)	65	22	82
Other Local Authority (OLA) Looked After Children placed in Kent & Medway, rate per 10,000 population (Mar 2025)	62	21	54
Unaccompanied Asylum Seeking Children (UAS) Looked After, rate per 10,000 population (Mar 2025)	7	2	14

Key points in relation to the data:

The data seeks to identify at a high level the indicative demand on the system. This will enable further service delivery planning in the future to manage more effectively the peaks across the system.

There is a consistent trend in all the metrics above that West Kent faces the least demand across children's services.

High needs (SEND): East Kent faces the most demand for EHCPs, followed by North and then West Kent. The is likely a combination of factors, including higher demand and more suitable provision available to meet need.

NEET: North and East Kent have similar levels of NEET, with the rate being highest in North Kent. West Kent's NEET level is lower.

Children's services: Each LAs demand profile for both CiN and CPPs is very consistent across the two metrics, with West Kent having the least demand across both. Nearly 50% of total LAC demand is in East Kent, which is not reflected in the OLA rate where more demand is in North Kent (45% of total OLA demand).

UAS: There is a large disparity in the UAS rate, which is expected given the location of East Kent and its costal make up. 61% of total UAS demand is in East Kent, with less than 10% in West Kent.

Opportunities for Children's Social Care delivery under Option 3A

- The creation of unitary authorities opens the door for new councils that are bold and ready to put prevention, early intervention and place-based leadership at the heart of their approach to children's services. The three-unitary model creates an opportunity to think big for children, act local and build in regional perspective.
- Investing in children is investing in future adults so that they are proud of their place and ready to work, contribute and live independently.
- Children aren't going to care about the size a council is. What matters to them is how they feel about where they live. It's important that children have a sense of connectivity with their local community and are ambitious about their future, with a supporting workforce confident they are making a difference.
- Unitary authorities create the best opportunity to combine the knowledge and skills that enable place-based leadership and local convening power, traditionally located in district councils, and which are essential in supporting the shift towards prevention and early intervention and co-production with children and families – with the specific and invaluable expertise of the expert children's social care workforce.
- The prevailing narrative is that big is beautiful and brings economies of scale. But there is an alternative lens. What matters most is proximity to people and the places they live in, staying close to families and supporting them. Close, connected communities, coupled with strong, passionate and ambitious leadership, will give children the best possible start in life. This is where smaller (than county) councils with the full range of unitary services can have a natural advantage. The advantages of proximity to place are not outweighed by larger scale. The evidence shows that outstanding outcomes are not correlated with scale. The elements of effective children's services are effective leadership, strong management oversight and commitment to engaging with children and families collaboratively and responsively.
- Our three-unitary model strikes the optimum balance between economies of scale, the ability to connect council services together to work to a common purpose for children, and to convene partners key to the common purpose at a place level – all of which are essential ingredients for successful outcomes for our children. In particular, Option 3A aligns with health system economic geographies (which are reflected in our established Health and Care Partnership Boards) and this congruence assists in simplifying what is a complex collaboration network in contrast with a local government structure which cuts across health service geographies and would require collaboration with multiple local health systems. Our NHS peers have said "As demonstrated in our recent Kent and Medway NHS Strategy our aim is to concentrate resources on frontline services, with a focus on sustainable and community care. On this basis our preference would be for **the smallest number of unitary councils to minimise infrastructure costs and the risk of fragmenting services.** Whilst acute healthcare service geographies are relatively fixed in their nature, the partnerships in which we operate offer potential for future alternative alignment with other public sector organisations. The 3A LGR model best meets these requirements.
- 3A would also allow for children's system partnerships including for public health, mental health support, youth justice and broader safeguarding with fewer layers than at present brining the opportunity for efficiency and increased agility; 3A would create the opportunity

for more in-depth local place and community knowledge and more effective insight from both local quantitative and qualitative data.
- Where children's specialist services need a county scale to be viable this can be created through co-operation and existing governance mechanisms e.g. S101 committees to align with our established devolution geography. Where even larger geographical scale is needed for the care of children with very complex needs, this can be achieved through participation in the South East Regional Care Co-operative

Option 3A is the ideal place to start our reimagining of children's services to build the best place to be a child, a place where communities thrive, families are supported to be the best they can be and children are proud to call home, to unlock the real potential of place and transform lives.

Housing and homelessness

Overview of current housing and homelessness delivery

Operating within the structures of the Homelessness Reduction Act 2017 and national housing targets, councils are pivotal in delivering housing and homelessness services.

The provision and key responsibilities vary across the type of local authority.

- **Medway Unitary Council:** full housing authority covering strategic spatial planning, homelessness services, social housing allocation, private sector housing regulation and affordable housing delivery.
- **Kent County Council:** indirect housing impact including securing supply for needs arising from social care, public health, education and strategic infrastructure planning influencing housing needs and support for vulnerable people.
- **12 district councils:** local housing authority covering homelessness prevention and relief, social housing allocation, private sector housing enforcement, local housing strategy and strategic spatial planning to enable supply of housing through land allocations including for small sites and garden communities and determination of planning applications. In addition, some districts are housing providers which includes building and managing housing stock and in some cases managing a Housing Revenue Account.

Delivering successful outcomes is a complex challenge, whether it's managing vast infrastructure projects or tackling homelessness in our communities.

While large-scale programmes demand intricate planning, addressing homelessness requires understanding a deeply personal and varied set of needs.

Homelessness itself stems from a difficult mix of financial struggles like poverty, unaffordable housing and low wages; societal problems such as domestic violence, discrimination and a lack of support; and individual battles with mental health, addiction, physical disabilities, or past trauma.

This intricate web of challenges extends beyond homelessness, frequently impacting other vital services like adult and children's social care.

Initiatives are already in place and there is the opportunity to build on these through LGR.

Case study – Homelessness Employment Pathway - Gravesham Brough Council

Gravesham Borough Council (GBC), using its role as the area's largest employer, has successfully tackled a critical barrier to employment for homeless individuals.

Recognising traditional employment services often fail vulnerable individuals, the council identified an opportunity to use its influence to support disadvantaged people back into the workforce and to stabilise its own frontline services, such as waste and refuse collection, which experienced high staff turnover and agency spend.

This led to the introduction of a dedicated Employment Pathway in September 2023, specifically targeting former rough sleepers residing in GBC's supported housing scheme.

The Employment Pathway is designed for holistic support, moving beyond just job placement.

Once clients are ready for employment, they receive help with CV creation and employment risk assessments.

The programme includes an induction day, two weeks of work experience and entry into casual contracts, providing a crucial first step back into the workforce.

The initiative integrates ongoing mentorship, mental health and wellbeing support through weekly sessions and flexibility during hardship, all aimed at helping individuals establish a routine, build confidence and develop essential skills for long-term stability and independence.

This innovative approach has proven highly successful, not only providing participants with vital employment history and a route to unsupported accommodation but also significantly reducing the council's in-year agency spend.

Due to its positive impact, GBC is now expanding this initiative, rolling it out to private companies to maximise job opportunities for more vulnerable individuals.

Innovation on a local scale which can be applied across an area of multiple unitary authorities.

The need for working together and sharing of information to deliver outcomes cannot be underestimated.

The Kent Housing Group (KHG) is a forum for housing organisations in Kent and Medway.

KHG has representation from all 12 district councils across Kent, Medway Council, 13 housing associations, four support providers, Kent County Council and Kent Public Health.

KHG also has affiliated membership with a number of organisations who have a vested interest in the housing sector across Kent and Medway.

This strong strategic approach will provide stability through LGR and beyond.

Case study – Kent Forum Housing Strategy

The Kent Forum Housing Strategy provides clarity on the major strategic housing challenges facing Kent and Medway, acknowledges that past ways of working may not be fit for the future and identifies where a Kent and Medway perspective can add value, stimulate innovation and contribute to the delivery of local aims.

The strategy is unique in that it looks across a whole county area and brings district, borough, unitary and county council ambitions together through a bottom-up approach.

This is not about centrally-imposed targets. This is about lower tier and unitary authorities identifying their own local housing needs and requirements, while recognising the added value that can be gained by adopting a common approach to meeting these where appropriate.

An adaptable model which can be shaped for future delivery while minimising the risks associated with change to the current model.

Key housing and homelessness delivery challenges

Overarching challenges:

- **Complex delivery landscape:** the involvement of 14 councils delivering diverse services and initiatives across the area results in significant complexity and different approaches to policy formulation through to actual delivery.
- **Data fragmentation:** Kent and Medway use the same software for homelessness and operation of housing registers. There are multiple systems for housing management activities meaning that it is difficult to gather comprehensive data and insights impeding effective decision-making.
- **Staffing and capacity gaps:** a notable shortage of skills and capacity including challenges in recruiting and retaining experienced staff, impacts the effective delivery of both large infrastructure projects and critical public services.
- **Funding constraints:** investment in housing delivery varies across Kent. Notwithstanding this, the level of investment, grant and subsidy needed to address social housing need is not available. Limited and often short-term funding restricts long-term planning and investment in housing and homelessness services, making proactive solutions difficult.

Housing supply and delivery challenges

- **Housing delivery shortfalls:** each district has its own challenges in delivering housing requirements both in terms of the overall amount of housing needed and housing that people can afford including social rented homes and supported accommodation. Housing cost to earning affordability ratios differ across Kent and Medway resulting in varying housing requirements. Market conditions which significantly impact the ability of housing developers to deliver housing also vary markedly. This produces a complex picture. Consequently, delivery performance varies markedly both spatially and over time in line with economic cycles. Reflecting the national picture, meeting housing delivery plans is challenging, leading to a scarcity of housing and in particular affordable housing options.
- **Rising demand:** rising demand for housing is further exacerbated by Kent's location. Our coastal position results in a situation where asylum seekers disproportionately put strain the housing system, leading to increased demand for temporary accommodation, pressure on the private rental market, significant unreimbursed financial burdens and operational challenges.
- **Proximity to London**: where housing costs and demand produce a more acute set of challenges also impacts on demand in Kent through out-of-area placements, gradients in costs for housing being generally higher in the west of the county results in out-of-area placement within Kent and the spatial pattern of this is complex. For example, currently Maidstone currently hosts 222 out-of-area placements by other Kent authorities while Thanet hosts five.

Unitary authorities covering larger geographies and populations offer the opportunity for many of these pressures to be managed within their own boundaries.

- **Private rental sector issues:** concerns exist regarding the quality of homes in the private rental sector and frequent breakdowns in relationships between tenants and landlords, contributing to housing instability. The distribution of challenges and resources are not uniform.
- **Social housing stock:** the availability of local authority social housing stock, coupled with varying quality and high maintenance costs for existing properties. Not all current authorities are stock holding. This needs to be recognised in both the transition to new unitary authorities e.g. arising from the need to appropriately engage with tenants and the time needed for successor authorities to design a structured approach to future arrangements in the larger geographies where social housing will have a more diverse landscape in terms of providers.
- **Temporary accommodation (TA) shortage:** a lack of suitable and affordable temporary accommodation options further strains services and resources. There is a mixed picture across Kent with variation in investment in TA or capacity arising within HRAs in some places. Notwithstanding this all councils use expensive nightly-paid accommodation to bridge the gap between their own accommodation levels and need.

Homelessness services

- **Homelessness visibility and policy fragmentation:** the propensity for rough sleeping and homelessness varies across Kent and Medway reflecting differences in the factors that cause homelessness. This impacts on the consequent demands, the distribution of cost and the solutions that have been developed. Maintaining visibility of individuals experiencing homelessness is difficult as they often move across districts. This is compounded by differing strategies and policies between councils, hindering a unified approach.
- **Disconnected services and complex needs:** homelessness is often linked to a wider range of complex individual needs, yet services are not always joined up effectively for proactive prevention and holistic support.

Future housing and homelessness delivery and opportunities through LGR

We are committed to:

- **Building on successful initiatives**: identify, scale and celebrate proven best practices and successful initiatives across Kent, fostering shared learning and replicating positive outcomes.
- **Communities**: listen to and collaborate with our diverse communities, ensuring their voices shape housing and homelessness strategies and solutions.
- **Partner collaboration:** continue to foster robust and effective partnerships with all stakeholders including statutory bodies, third-sector organisations and private providers to deliver comprehensive and coordinated support.
- **Simplified Strategic Planning**: simplified strategic plan for housing and homelessness, maximising available opportunities and resources through coordinated effort across smaller unitary and place focus.
- **Holistic service integration and prevention:** adopt a truly holistic approach to service delivery, ensuring seamless integration across all relevant services and the wider system to proactively support, prevent and reduce homelessness through early intervention.
- **Data insights:** simplified and streamlined systems will enable data and insights to be more readily available to inform strategies, measure impact and drive continuous improvement in service design and delivery.

- **Policy alignment for impact:** drive greater alignment of policies and ways of working, where practical, to achieve more consistent and effective outcomes and address systemic drivers of housing instability.
- **Sustainable**: focus on developing and implementing sustainable, long-term solutions that address the root causes of homelessness and ensure lasting housing stability for individuals and families.

Case study – innovative use of Housing Revenue Account

Ashford Borough Council is making innovative use of its Housing Revenue Account to deliver an ambitious programme of more than 1,000 new council-owned homes within the next six to seven years.

The council has an identified pipeline of 33 sites which will deliver a mix of affordable and social rent homes, including independent living homes for older people and accessible homes for people with disabilities, as well as properties for shared ownership.

A diverse range of delivery models are being used to achieve the pipeline of new homes.

These include:

- building on council-owned land
- regeneration schemes
- largescale acquisitions from developers of already-built homes
- purchasing affordable homes that have been secured under a s106 agreement which Registered Providers are unable or unwilling to deliver and package deals where land is purchased and the properties paid for during the construction process.

The HRA is also used buy properties on the open market and taking them into council ownership and use.

A majority of these properties are former council homes that were sold via the Right to Buy.

The strategic focus is on larger homes that can be adapted for people with physical disabilities to help them live independently.

This ambitious programme aims to significantly address housing needs and improve the quality of life for residents across the borough.

A scalable best practice approach which can replicate positive outcomes.

Case study: Canterbury City Council – resettlement support

Canterbury City Council took the decision to deliver resettlement support in house rather than using the KCC provision, supporting those arriving on resettlement schemes since 2015.

The work expanded rapidly in 2021 when the council supported the opening of two hotels to accommodate Afghan nationals within the district.

The wraparound support work includes successful integration into communities, access to services, one-to-one and group support, money management, entering into employment/skills/training and longer-term housing solutions.

The experienced team consistently deliver excellent integration outcomes for families.

A key strength of the Canterbury approach is partnership working with voluntary and statutory sector partners to deliver joined up and innovative services such as the Welcome Hub – a jobs, English language and drop-in advice service.

This initiative was praised by the Ministry of Defence as a model of good practice and work is already underway to replicate this approach in other areas of Kent.

Housing and Homelessness under Option 3A

Table 24: *Housing and Homelessness Metrics*

Metrics	North Kent	West Kent	East Kent
Homelessness Rate per 1,000 Households (Jan-Mar 2025)[40]	6.6	4.1	8.4

Homelessness rates vary across Kent. Option 3A is designed to provide the additional capacity and scale for these challenges to be addressed, particularly in the East. There will continue to be collaboration Kent-wide to find the best solutions for critical challenges such as homelessness.

Opportunities for Housing & Homelessness delivery under Option 3A

Devolution will be a key enabler to help accelerate delivery of the future ambition through strategic joined up planning and delivery across the area.

Housing delivery

The current two-tier system has led to inefficiencies, lack of coordination in the strategic spatial planning of our places, and the consequent challenges in delivering housing and the complementary infrastructure. This leads to frustration, including for our communities.

The integration of all council responsibilities within a single tier of administration offers a number of benefits. Planning decisions are closely linked to transport, infrastructure, and housing, having these services under the same organisation ensures better coordination. For example, negotiating highway conditions for a Section 106 agreement is more efficient when transport and planning departments are within the same council and aligned to the same priorities.

Larger, better resourced unitary authorities will provide a more cohesive planning system, greater access to specialist expertise, and better integration of transport and infrastructure services.

The three-unitary model creates councils of larger geography and financial scale than individual districts and allows for better resource allocation for the tasks necessary to achieve this. Many district councils struggle to maintain stable dedicated planning teams due to budget constraints and recruitment challenges. Larger unitary authorities can employ more planners, improving expertise, efficiency and resilience by offering greater development opportunities and career pathways. They are also better equipped to recruit specialists such as ecologists and urban designers, roles that smaller councils find difficult to sustain.

[40] https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness

The critical mass of three councils would facilitate a council house building programme of scale and ambition, with efficiency derived from each having a single Housing Revenue Account, development team and housing management team, with a long-term partnership management status with Homes England to secure Social Housing Grant Funding. Such a programme would generate significant Temporary Accommodation cost savings to the General Fund and result in better quality of life for people needing to secure social housing.

Homelessness

People experiencing homelessness have far worse health and social care outcomes than the general population; they need services that not only provide a secure home but also provide a long-term commitment to care to promote recovery, stability and lasting positive outcomes

The creation of unitary authorities in principle is key to the integration of services to improve outcomes for people experiencing homelessness, and to contribute to ending homelessness. A unitary structure would enhance our ability to achieve the recommendations of the National Institute for Health and Care Excellence, and the Centre for Homelessness Impact's recommendations as set out in the Integrated health and social care for people experiencing homelessness guidance in March 2022.

In comparison with two-tier working, Option 3A would better enable support for people who experience multiple and overlapping disadvantages. For example, through enabling:

- Commissioners of health, social care and housing services to work together to plan and fund integrated multidisciplinary health and social care services for people experiencing homelessness, and involve commissioners from other sectors, such as criminal justice (prison and probation services) and domestic abuse, as needed. Working in this way would enable a more effective contribution to the government's aim of ending rough sleeping and preventing homelessness.
- Homelessness multidisciplinary teams to be established to act as expert teams, providing and coordinating care across outreach, primary, secondary and emergency care, social care and housing services and providing person centred wrap round care and case management, ensuring continuity of care and enabling cost and trauma reduction through reducing the number of assessments for each person – as demonstrated for example through the model implemented in Wigan
- Local integrated homelessness health and social care needs assessments including collective work to quantify and characterise the population experiencing homelessness or at risk of homelessness, including health inequalities, diversity and inclusion issues and specific needs and identify trends, and create better opportunities for more integrated service delivery. This could be complemented by designating a lead for safeguarding the welfare of people experiencing homelessness and practical support which is difficult to achieve across two tier local government and representing the needs of people experiencing homelessness comprehensively on the Safeguarding Adults Board

In terms of the optimum model for Kent and Medway, Option 3A creates local government geographies largely congruent with our health economy and health and care partnerships and the operational divisions of Kent Police; this alignment would enable co-terminosity which has been identified by both local government and our partners as enabling closer collaboration and opportunities for integration and transformation.

Transport and highways system function

Overview of current transport and highways delivery

The transport and highways system function encompasses a broad range of activities from strategic transport planning and policy development to the delivery of highways programmes, planned and reactive maintenance and network management including coordination with utility works.

Highways services in Kent and Medway are managed by three primary authorities: National Highways, Kent County Council, and Medway Council.

Each holds distinct responsibilities for different parts of the road network, ensuring comprehensive coverage across the region.

While these three are the designated highway authorities, district councils also play a vital supporting role, acting as key intermediaries and advisors in local highway-related matters and securing developer financial contributions.

- **Department for Transport:** defines national policy for transport planning and systems including public transport and highways. This includes its vision for the future of the English strategic road network and a Roads Investment Strategy.
- **National Highways:** manages and improves the strategic road network including motorways and major A-roads (trunk roads) within Kent and Medway.
- **Kent County Council (KCC):** is the transport planning authority for Kent and the highway authority for the majority of Kent, overseeing the production of transport and infrastructure strategy and the management, maintenance and improvement of local roads, pavements, cycleways and associated infrastructure.
- **Medway Council:** as a unitary authority, it is the transport planning and highway authority for all local roads and highways within its specific Medway unitary boundary.
- **District councils:** provide crucial local input and advice on planning applications impacting transport and highways. While Kent County Council (KCC) acts as a statutory consultee on planning applications, providing advice, identifying conditions, and managing Section 278 agreements, district councils also act as public liaisons for community concerns and manage local amenities.

Examples of collaboration include district council engagement with KCC and National Highways to bring forward local improvements on the strategic network.

Case study - Ebbsfleet Garden City

The Ebbsfleet Development Corporation EDC was announced in 2015 to facilitate the delivery of up to 15,000 homes and create a 21st-century Garden City in Ebbsfleet, north Kent.

The Ebbsfleet Development Corporation is the planning authority for development management.

However, Dartford Brough Council (Dartford BC) is the local planning authority.

Dartford has worked closely with the Ebbsfleet Development Corporation and KCC highways in the successful preparation of the Dartford borough local plan and implementation of development schemes and the associated infrastructure requirements.

This is facilitated through regular meetings and collaboration on sustainable travel projects between the EDC, Dartford BC, Gravesham Borough Council and KCC.

This builds on a longstanding history of collaboration on the Ebbsfleet area, prior to the establishment of the EDC, in relation to junction and road improvements required to facilitate the significant growth in the area.

Case study: Bringing back international rail services to Kent

Strong and sustained collaboration has taken place between KCC and district and borough councils to bring back international rail services like Eurostar to Kent.

This involved a concerted effort to build a strong case for resuming operations, addressing technical challenges with operators and infrastructure managers and demonstrating the economic benefits of serving the Kent passenger market.

The aim was to convince key stakeholders both Ebbsfleet International and Ashford International stations should have services restored, similar to the pre-pandemic situation in 2020.

This objective was achieved through collaboration between Kent County Council (KCC) and the district/borough councils, particularly Ashford and Dartford.

While KCC led on the transport aspects and coordinated economic arguments between the boroughs, the individual councils were crucial in championing their respective stations and highlighting local economic growth opportunities.

This combined effort allowed for a comprehensive and unified argument to the government for the reopening of both stations.

Key transport and highways delivery challenges

- **Active Travel and pedestrian infrastructure:** both authorities face challenges in maintaining and improving pedestrian environments. Ageing footways, limited accessibility in some urban centres and gaps in safe walking routes, particularly around schools and town centres, hinder efforts to promote walking. Funding constraints have slowed progress on upgrading crossings, improving public realm quality and ensuring compliance with accessibility standards, especially for vulnerable users.
- **Sustainable and public transport connectivity:** bus services continue to face declining patronage and reliability issues due to congestion, rising operating costs and driver shortages. Limited funding for service subsidies restricts route coverage and frequency, particularly in rural areas. Opportunities to enhance integration between bus, rail and active travel modes are often constrained by infrastructure limitations and inconsistent investment across the region. The ambition to grow sustainable travel is also challenged by public perceptions of reliability and affordability.
- **Private vehicles and freight movement:** high volumes of commuter, tourist and freight traffic, driven by Kent's strategic location, cross-Channel gateways and proximity to London, place sustained pressure on the road network. This contributes to congestion, accelerated asset deterioration and difficulties in meeting air quality and carbon reduction targets. The maintenance backlog, exacerbated by rising material costs and climate impacts, continues to challenge network resilience.

- **Operational, workforce and coordination challenges:** persistent workforce shortages and skills gaps across engineering, planning and operational roles affect both authorities. Coordination with utility companies and developers for roadworks and infrastructure upgrades remains complex and disruptive, often prolonging project delivery times and reducing public satisfaction.
- **Governance, geography and strategic balance:** Medway Council, as a unitary authority, has direct responsibility for all local transport functions within a dense urban area, requiring a fine balance between supporting growth and improving sustainable transport options. Kent County Council, overseeing a much larger and more rural network, faces distinct challenges in ensuring equitable access and consistent service standards across varied geographies.

<u>Future transport and highways delivery and opportunities through LGR</u>

Future delivery of transport and highways services relies on ongoing collaboration and a strategic approach to deliver for the people of Kent.

In the future we are committed to:

- **Integrated strategic planning:** significantly streamlining the current 12 Local Plans, this approach fosters a more cohesive and joined-up strategic planning framework across the area, particularly for transport and highways infrastructure, with improved integration of land planning and transport planning.
- **Equitable influence:** the creation of evenly-sized unitary authorities ensures each entity possesses a balanced voice, enabling effective influence over strategic decision-making for the entire transport network.
- **Service harmonisation:** standardising service provision and associated fees and charges across the entire area will simplify processes and enhance consistency for residents across all transport-related services.
- **Balanced local governance:** this model establishes unitary authorities that are sufficiently large for strategic decision-making yet remain agile enough to deeply understand and respond to local impacts and needs across the transport system.
- **Enabling devolution:** this option directly supports the ambition for establishing a Mayoral Strategic Authority, facilitating greater local control and accountability over transport and highways.
- **Innovative service delivery:** exploring and implementing shared service models and pioneering approaches to enhance organisational resilience and service effectiveness which can support future devolution plans.
- **Optimised commissioning:** implementing a strategic, integrated commissioning approach where appropriate, to effectively shape and influence the market, driving better outcomes and value.
- **Resilience:** if there is poor delivery in one unitary authority, the delivery in the remaining unitary authorities is unaffected.

<u>Opportunities for Highways delivery under Option 3A</u>

Unitary local government will bring together strategic planning for sustainable and integrated land use and transport systems enabling alignment of strategy, policy and decision making. 3A gives an opportunity to think big, act local and work across the whole of Kent and Medway when appropriate.

Sustainable transport planning involves creating systems that are environmentally responsible, socially inclusive, and economically viable. Option 3A will create better opportunities for success because it enables:

- Integrated Policy and Planning including collaboration between transport, land use, environment, and economic development services within a single organisation which is critical for improving social (including health), environmental and economic outcomes for our communities.
- More effective governance where all these factors can be considered and weighed up by one decision making body, which can then balance the different considerations to enable prioritising investments that deliver co-benefits across mobility, environment, and social inclusion.
- Enables more transparent decision making close to the public.
- Consideration of transport planning and systems alongside a greater emphasis on prevention and early intervention for social well-being, means that the opportunities are likely to be greater for environmental stewardship, accessibility and equity.

3A will result in three councils each with multiple urban centres and large rural areas requiring a transport planning approach that recognises both, and their interactions and interdependencies. Localised transport planning in the three councils enables meaningful community engagement while maintaining the scale needed for effective asset risk management, data led approaches, innovation and use of technology and leveraging of investment.

Opportunities will be created for more localised planning, including establishing mobility hubs in our market towns to connect rural and urban travel modes delivering benefits such as reduced transport poverty, more inclusive service delivery and increased connectivity for isolated communities.

Unitary authorities will reduce fragmentation, bringing custodianship of transport systems, infrastructure and related services, including street cleansing, into the same organisation. This will improve co-ordination and collaboration to improve the overall quality of the public realm for residents and visitors.

There are good examples of achieving this in the UK where there are urban/rural mixes similar to the three unitary authorities in this model, including Bournemouth, Christchurch and Poole (BCP) and Chesire East. BCP has created an integrated transport strategy across its three major towns, made good investment in active travel, bus priority schemes and smart parking and alongside this has strong performance in street cleaning and maintenance. Chesire East is recognised for its asset-led highway maintenance strategy and uses data-driven planning and risk-based inspections – demonstrating that this can be achieved at a smaller than county spatial footprint and critically has been small enough to achieve strong community engagement in transport planning

Kent's location, its role as the Gateway to Europe via the Channel Tunnel and ports, and the associated strategic road and rail links (including the Lower Thames Crossing) means that it is essential that Option 3A is complemented by devolution. This will be achieved through the creation of a Strategic Authority which will take responsibility for, and tackle, the consequent opportunities and challenges.

Devolution and a Strategic Authority are also key to establishing a Kent-wide Transport Partnership to coordinate strategy, funding bids, and innovation, sharing data, expertise, and technology platforms across the three councils and engagement with regional bodies like Transport for the Southeast for strategic alignment.

Waste services

Overview of current waste delivery

As a unitary authority, Medway Council is the Waste Collection Authority (WCA) and Waste Disposal Authority (WDA). Contracts are in place with Medway Norse, Countrystyle and Veolia with lengthy terms up to 2040.

Waste arises in Medway of 117kt per annum of which 38% is recycled, reused or composted

Kent County Council acts as the Waste Disposal Authority (WDA), contracting with third parties like FCC and CSKL until 2030 to manage waste disposal infrastructure.

This includes Household Waste Recycling Centres (HWRCs), Waste Transfer Stations (WTS), Material Recovery Facilities (MRFs) and Energy from Waste (EfW) facilities at Allington.

The 12 district councils serve as Waste Collection Authorities (WCAs), collecting household waste and delivering it to KCC-managed disposal outlets.

Waste arises in Kent of 650kt per annum of which 42.1% recycled, reused or composted

Kent and the districts work closely through partnerships including Mid Kent Partnership, South West Kent partnerships and the Kent Waste Partnership.

Case study – Kent Waste Partnership

The Kent Resource Partnership brings together staff from Kent County Council and the 12 district councils.

Together, they manage waste collection and disposal, street cleaning and enforcement services across the region.

A dedicated strategic lead guides all partnership activities including how they are run, how they communicate, and what projects they work on.

The lead also builds relationships with other groups and looks for new opportunities and funding.

The Kent Joint Municipal Waste Management Strategy, developed through the partnership provides the framework for collaborative delivery with a strong focus on developing and delivering services to be efficient, effective and sustainable while navigating significant change in waste policy.

All partners contribute money each year to cover staff costs, for the lead and an analyst, and to pay for agreed projects.

A recent campaign to recycle food waste increased the average amount collected and recycled across seven areas by 20%.

This collaborative approach and shared strategy have been crucial in driving alignment, maintaining a shared focus and ultimately achieving positive outcomes.

Key waste delivery challenges

- **Aging infrastructure:** maintaining and upgrading existing waste management infrastructure to ensure continued operational efficiency and reliability.
- **Infrastructure capacity:** strategic planning and investment are required to meet future infrastructure demands, particularly in response to significant housing growth.
- **Divergent delivery approaches and policies:** inconsistencies in collection methodologies and varying resident expectations across different areas hinder the establishment of a unified and efficient waste management system.
- **Waste and collection strategy misalignment:** the two-tier delivery structure often leads to a disconnect between waste strategies and budgetary allocations, potentially resulting in isolated decision-making and collection approaches that do not adequately consider disposal costs.
- **Limited funding transparency:** a lack of clear information regarding the flow of funding from central government to local waste services.
- **Complex contractual landscape:** the presence of multiple long-term contracts across Kent, including one currently under dispute, complicates operational management and strategic planning.
- **Public engagement and behaviour change:** challenges in encouraging effective resident participation in recycling schemes, waste reduction and sustainable waste practices including addressing contamination issues.
- **Regulatory compliance and evolving legislation:** the ongoing demand to adapt to and comply with changes in national and international waste management regulations, environmental standards and targets.
- **Workforce recruitment and retention:** difficulties in attracting and retaining skilled personnel across all levels of waste management operations.
- **Technological adoption and innovation:** the complexities and costs associated with integrating new technologies for waste sorting, treatment, energy recovery and data management.
- **Illegal dumping and fly tipping:** addressing the persistent issue of illegal waste disposal and its associated costs and environmental consequences.

Future waste delivery and opportunities through LGR

In the future we are committed to:

- **Learning from success:** we will take what has worked well across Kent, like our Waste Liaison Officers, and build on those successes to make things even better.
- **Working together:** we will strengthen our relationships across Kent, adapting our partnerships as needed to deliver on our regional waste plans.
- **Smarter way to deliver:** we will look into creating a single, strategic waste body for the whole region, potentially linking it with how we plan for new developments.
- **Connecting the dots:** we will bring together collection and disposal budgets so we can make smarter decisions that consider the whole picture, not just parts of it.
- **Better use of information:** we will get our data and systems talking to each other so we can gain clearer insights and make better plans.
- **Planning ahead:** planning for the infrastructure we need, making sure it fits with local areas and future building projects.

- **Making decisions easier:** working together across future councils will enable us to reach consensus and move forward more quickly.

Case study – Waste Liaison Officers

Kent County Council (KCC) has established two Waste Liaison Officer roles to enhance the operational relationship between the Waste Disposal Authority (KCC) and the 12 district and borough councils, which act as Waste Collection Authorities.

These officers serve as a crucial link, fostering communication, promoting shared understanding, and supporting performance improvement across both tiers of local government.

Their responsibilities include facilitating quarterly liaison meetings, sharing monthly performance data for transparency and resolving operational issues arising between the collection and disposal authorities.

By acting as a bridge, they ensure service challenges are addressed collaboratively and efficiently, ultimately improving outcomes for residents.

The Waste Liaison Officers monitor performance data - tonnage, recycling and contamination - for statutory reporting and improvement, collaborating with district teams and KCC Waste Data and Insight to interpret trends.

They ensure two-way communication on policy and operational changes for consistency, translate complex data into actionable insights for districts and coordinate abandoned vehicle disposal.

In addition to strengthening relationships, the Waste Liaison Officers have significantly improved operational efficiency by resolving service issues faster and with fewer escalations.

They have also been crucial during disruptions like extreme weather or contractor problems, coordinating responses and maintaining service resilience through rapid communication and joint problem-solving.

This has minimised impact on residents and upheld service standards.

Case study – creation of a waste Local Authority Trading Company

Canterbury Council established a Local Authority Trading Company (LATCo) called Canterbury Environment Company (Canenco) to take over household waste collection services from a commercial contractor.

This decision was made after an options appraisal due to dissatisfaction with the previous service.

Canenco's board consists of three council officers and a managing director with extensive waste management experience was recruited.

Staff from the former contractor were transferred to Canenco and the council bought the necessary vehicles.

The council maintains oversight of the client function and waste collection strategy.

This change has resulted in a more responsive company for waste collection and street cleansing.

The council and Canenco teams work closely, leading to efforts to reduce contamination in dry recycling bins.

Following the successful transfer of waste collection and street cleansing in February 2021, grounds maintenance services were transferred in December 2021 and public toilet cleansing and maintenance in June 2024.

Opportunities for Waste delivery under Option 3A

The move toward unitary status will enable Waste Collection Authorities in Kent to improve efficiency and consistency. Councils that are larger than our current districts will be beneficial in terms of economies of scale in vehicle fleets, staffing, and contracts, standardised service design (e.g. bin sizes, collection frequency) and better capacity for data-driven service optimisation.

This is achieved to some extent through current shared service collaboration. For example, Maidstone, Swale and Ashford have a joint contract as do Tunbridge Wells and Tonbridge and Malling. The need for these arrangements would diminish if three unitary authorities are created, reducing complexity, improving transparency and potentially improving recycling rates and reducing confusion for the public. The population sizes achieved by a three-unitary model offers a good balance for operational efficiency and local responsiveness.

Waste Disposal Authorities manage infrastructure-heavy services like landfills, incinerators, and recycling centres and need to be large enough in terms of financial capacity and resilience to invest in advanced treatment technologies and waste volumes, co-ordinate strategic infrastructure planning, and negotiate long-term contracts with private operators effectively. The economies of scale are different from those applying to waste collection – typically WDAs need a larger population for optimal operation.

Combining collection and disposal under each unitary authority improves efficiency, accountability, and innovation. However, a balance needs to be struck in terms of scale. The disposal arrangements for the three councils would need to be aligned to ensure resilience and strategic control: which would be achieved through establishing a S101 Committee.

Public service reform

Criteria 3b. Opportunities to deliver public service reform should be identified, including where they will lead to better value for money

At the core of any successful public service organisation is the desire to do the best for those who need those services most. Kent, as an area, starts from a high base but there is an obvious desire to push further and faster for the citizens of Kent. LGR provides the platform to meet the moment and drive for fundamental change. There is a clear desire to be ambitious and to change public services. There is an underpinning set of shared principles focused around shifting the system to a preventative model. Public services cannot just keep meeting demand. They must move from being responsive to being proactive. LGR can be a catalyst to this change. Kent will drive the reform of public services, ensuring they are rooted in their communities with outcomes at the centre of decision making.

What is public service reform (PSR) and why is it needed?

Public service reform will be the core to the transformation of any new configuration of local government in Kent.

LGR offers an opportunity to rethink how people and communities are supported, moving from a fragmented, reactive system to one that is proactive, integrated and designed around the needs and strengths of Kent's residents.

There will be the opportunity to root this in reform of public services in the community and people of Kent.

Public service reform will seek to change the way public service professionals work together and ensure residents feel the positive benefits of that work, fundamentally changing the way services are configured and delivered.

Too often services are organised around institutional and professional boundaries rather than people.

In the latest Spending Review, the government outlined three principles to its approach to PSR:

- to integrate services so they are organised around people's lives;
- to improve long-term outcomes for people through a focus on prevention, relying less on expensive crisis management; and
- to devolve power to local areas that understand the needs of their communities best, with services that are designed with and for people, in partnership with civil society and the impact economy.

This is a once-in-a-lifetime opportunity to bring together services and improve outcomes.

A move from a demand-led model to a preventative model will allow for greater focus on outcomes and using precious resources in a more effective way.

Demand and prevention

Nationally and across Kent, public services face growing pressures.

The system is struggling to meet the demand for key services that are vital to the health and wellbeing of the community.

Services, such as adult social care and children's social care, are being stretched to breaking point. The system is broken for those who need it most.

Cuts to non-statutory services

Failure to see the connection between prevention and demand, and to join the dots across the silos between service providers, means statutory services are protected from deep root-and-branch transformation.

This leads to cuts in non-statutory services which are often preventative services.

Cutting preventative services only increases demand in the more expensive acute part of the system, resulting in increased costs and increased pressure on statutory services.

The 'front door' and thresholds

At the 'front door' of these statutory services, more and more expensive specialist staff are being deployed to triage and assess.

This means that these specialist staff are using their time on assessment rather than treatment.

Furthermore, given the cuts to services, and their lower capacity to deal with demand, eligibility thresholds for support are rising further, leading to gatekeeping and meaning help is only available at the point of crisis.

As a result, the most pressing demand - those in crisis - continues to grow, creating a cycle where services intervene too late and at greater cost.

Assessments and siloes

Given this increase in pressure, services often refer cases on to one another in attempt to control in-service demand and residents are frequently required to repeat their stories to multiple agencies, undergoing assessment after assessment.

Services have slipped into an 'assessment mindset' where practitioners and leaders have been siloed into their respective organisations.

This not only causes frustration but also erodes public trust and confidence in local services.

Outcomes

These mounting pressures are leading to poorer outcomes for residents.

The danger is this provides a negative loop where demand keeps growing and preventative services cannot be prioritised as resources are used to address the immediate challenge.

Fiscal control

At the same time as outcomes are declining and there is less preventative focus, public service leaders, trying to counteract growing financial risks, are increasingly reliant on salami slicing - incremental cuts to service budgets.

These cuts are a way to demonstrate better financial control but ultimately mean that services fail to address underlying demand and associated costs.

The urgency of now

The continued cutting of services will not resolve these challenges.

As crisis response consumes a larger share of resources, the underlying problems persist and intensify.

The system becomes reactive rather than proactive, focusing on managing emergencies rather than preventing them.

This approach is unsustainable, both financially and in terms of outcomes for residents.

A focus on prevention and early intervention needs to be prioritised before services hit breaking point. Now is the time to act.

Public services in Kent need to be fit for purpose and fit for the future.

Public service sustainability cannot be addressed without PSR.

Without reform, councils will be forced to make ever deeper cuts, further reducing the quality and accessibility of services and undermining the support available in communities.

LGR offers an opportunity to embrace change and deliver a different form of support that will serve communities in a way that works for them.

PSR: a new approach

Kent leaders are fully aware of the need to act and are ambitious to embrace PSR.

On 17th September 2025, leaders and chief executives from county, unitary, and district councils came together to outline and agree the opportunities presented by the LGR process. PSR was a central theme of the day, with stakeholders discussing and agreeing a vision for the region.

To achieve these ambitions for Kent and to break this cycle of growing costs and poor resident outcomes, the focus must shift to public services being more community based and preventative. This means focussing on outcomes, managing demand more effectively, and supporting people before their needs escalate.

Through the discussions between Leaders and Chief Executive, five PSR principles have been defined.

1 Community first
2 Outcomes focussed
3 Prevention and early intervention
4 Collaborative partnership working

5 Digital mindset

Community first	• Service delivery must be led by the needs and aspirations of communities, with openness and transparency in the governance and the delivery of public services. • By working closely with residents and local groups, services can better understand what matters most and tailor their offer accordingly. • Residents should feel that their voice is being listened to, and the subsequent service design reflects their input. • Services should be reshaped to reflect the needs of local people in flexible, community-focused provision. • By designing support around the lived experience of residents, Kent can deliver more effective, efficient, and equitable outcomes. • Leadership at all levels should mirror the diversity of Kent's communities, ensuring that a broad range of voices and experiences shape decision-making.
Outcomes focussed	• An outcomes focussed approach should drive the reform of public services. • Leaders must focus on providing joined-up support that is accessible and tailored to the presenting need of a person and designed around meeting that need. • A relational approach should be applied, where public servants focus a person, rather than just dispensing the services of their organisation.
Prevention and early intervention	• Prevention and early intervention are fundamental principles underpinning effective PSR that are essential to deliver better outcomes for residents, achieve financial sustainability, and build public services that are fit for the needs of the people of Kent. • By intervening before issues escalate, services can help people maintain control over their lives, access support at the right time, and avoid the distress and disruption that comes with crisis intervention. • Evidence demonstrates that pre-crisis intervention delivers financial benefits through a more effective and better targeted use of public services. Early help can reduce demand on high-cost crisis services and enable resources to be targeted where they have the greatest impact. For example, investment in family support, community health, and neighbourhood-based services has been shown to reduce the need for statutory intervention in both children's and adults' services.
Collaborative partnership working	• LGR presents a unique opportunity to reset and strengthen relationships across the public sector in Kent. • The benefits have been seen from a number of successful partnerships across the geography, involving statutory and non-statutory services, the voluntary, community and social enterprise sector, and a wide range of public bodies. • While there are excellent examples of joint working, these are often isolated and not yet embedded as the norm across the system. • Key partners that collaborate together include the police, health services, the Department for Work and Pensions, fire and rescue, housing providers, waste management, social services, education, and asylum support, among others.

Digital mindset	• To set up services for success, Kent needs to embrace the benefits of adopting a digital first mindset, seeking to leverage opportunities in LGR to transform services with a digital approach. • Integrated digital systems and improved data sharing between services will enable a single, holistic view of residents' needs, leading to a more joined up service. This will support more timely interventions, reduce duplication, and ensure that every professional involved has access to the right information at the right time. There is an opportunity to strengthen evidence-based decision-making and continuous improvement. • AI can be used to better understand large data and identify resident need or risk earlier. This can be used by services to more quickly and better understand the residents they serve, so more time can be spent on treating need rather than identifying it.

Case study – development of Integrated Neighbourhood Teams

In eastern Kent, the health and care partnership is working with four Primary Care Networks (PCNs) and the voluntary and community sector (VCS) as Integrated Neighbourhood Teams (INTs) early adopter sites.

They are looking at tools to identify those most at risk of needing social care or who are likely to experience worsening health outcomes.

This is known as risk stratification and will help identify those people who will benefit from remote monitoring and early identification of deterioration to provide additional support.

This is a formal programme working alongside John Hopkins University and will be invaluable in informing how INTs develop across the county of Kent.

This integrated approach is emerging across western Kent too as they prepare for INTs. This includes examples such as, but is not limited to:
- the core frailty team with shared case management and shared system use working well in Tonbridge PCN area.
- a mental health multi-disciplinary team dealing with complex mental health needs working well in Weald.
- Maidstone PCNs have worked together on a joint service provided by the VCS for people with complex mental health-related needs across all their PCNs.
- the Sevenoaks area has established a health and wellbeing huddle approach to link in with the core primary care networks/Integrated Neighbourhood Teams.

The development in INTs with health, social care, the VCS and other key organisations working together are a foundation of good practice to build off when adopting the PSR principle of partnership working.

Enablers of PSR

To realise the full potential of PSR, partners must work together to embrace its core tenets.

This means moving beyond organisational boundaries and focusing collectively on the needs of the person.

It requires a cultural shift. One where engagement is purposeful, open and rooted in a shared ambition for Kent as a whole.

Several enablers are critical to making this collaborative approach a reality:

1. **More permeable boundaries between partners and services:** services must become more open and flexible, allowing for the free flow of information, resources and expertise. When one partner's actions benefit another's budget or outcomes, this should be recognised and the benefit shared.
2. **Shared benefits and budgets:** a move towards shared benefits naturally lends itself to the possibility of shared budgets. By pooling resources, partners can take a joined-up approach to tackling key issues, ensuring investment is targeted where it will have the greatest impact.
3. **Co-location of services:** Bringing services and organisations together physically - whether in community hubs, shared offices, or integrated teams - can drive a more joined-up way of working, break down silos and make it easier for residents to access the support they need.
4. **Inclusive partnership:** No partner should be left out of this process. Every organisation, whether statutory, voluntary or community-based, must feel a sense of purpose and importance in helping the people of Kent. Organisations should embody a shared learning culture, recognising that they have something to learn from someone else round the table.

Achieving this vision will require organisations to work together differently.

It means moving away from transactional relationships and towards a model where partners are engaged as equals, united by a common purpose.

It means recognising the challenges facing communities cannot be solved by any one organisation alone.

The next steps for PSR:

There is broad agreement among Kent Leaders they want to:

- **Refresh working arrangements between organisations**: updating governance structures and shared forums between Chief Executives to enable more effective joint working. This will result in better alignment and a collective approach to PSR.
- **Establish shared learning culture**: councils and partners actively sharing key learning, where best practice is actively sought and embedded.
- **Purposeful and reassuring staff communication**: ambition for reform must be communicated clearly and confidently to staff, providing reassurance about their future and a sense of shared purpose.
- **Prepare for a seamless transition**: LGR should a seamless handover between services with support that feels joined up and easy to navigate. Residents should feel well informed about the changes from LGR, what to expect and the positive impacts that will be driven.
- **More voices are required and welcomed**. There is also an ambition to engage with voluntary, community and social enterprise (VCSE) organisations to understand excellent practice that drives resident outcomes currently. To achieve more community-centred, outcome focused service delivery, collaborating with the VCSE, who are at the heart of communities and places, will be pivotal.

Case Study – Dover SmART project

Dover SmART Project is a charity founded in 2013 to support disadvantaged children, especially young carers, through creative activities to improve their wellbeing and boost their confidence.

It runs creative groups to boost children's aspirations and as a safe space away from other responsibilities.

The charity has evolved to support other age groups now, such as supporting older people who may be isolated in the community or have conditions like dementia.

Dover SmART project is funded by a variety of fundraising efforts including the private sector and the district council.

In 2025, the Dover SmART Project was named a winner at the Kent Mental Health Wellbeing Awards.

The SmART project demonstrates the impact the VCS can have on the community.

There is an opportunity for voluntary and community sector projects to use their expertise and knowledge to support statutory services in supporting vulnerable people, acting as partners where there are opportunities for a holistic approach.

PSR under Option 3A

Option 3A is closely aligned with existing public sector geographies, particularly Health and Care Partnerships and acute trusts, which are among the most complex and costly structures to reconfigure. This alignment minimises unnecessary disruption, fragmentation and financial risk while creating a strong platform for wider public sector reform through more integrated planning, joint commissioning, and place-based approaches to service delivery. By maintaining coherence with established boundaries, Option 3A enables more effective collaboration across health, care, and local government. The model is further reinforced by the support of key strategic partners, including NHS Kent & Medway, Kent Police, and Kent Fire and Rescue.

In addition, the scale and capacity of a three-unitary model enable Option 3A to deliver more ambitious and complex reforms in social care.

Criteria 4: Working together to understand and meet local needs

This section includes:

Incorporating public and stakeholder engagement in model design	**Criteria 4a and 4c**
Preserving local identity, culture and historical significance	**Criteria 4b**

Incorporating public and stakeholder engagement in model design

Criteria 4a. It is for councils to decide how best to engage locally in a meaningful and constructive way and this engagement activity should be evidenced in your proposal

Criteria 4c. Proposals should include evidence of local engagement, an explanation of the views that have been put forward and how concerns will be addressed

Through resident surveys, partner meetings, and community outreach, Kent has ensured local voices shape the business case. Strong support for Option 3A from key stakeholders – including NHS Kent & Medway and Kent Police – reflects a shared strategic vision focused on minimising fragmentation, enhancing service delivery, and aligning with existing operational structures. This proactive engagement exceeds MHCLG guidance and demonstrates Kent's commitment to meaningful community involvement.

Overview of the approach taken to engage the community and stakeholders:

Kent's approach to LGR has been firmly rooted in the principles of transparency, inclusion and shared ownership.

Kent's 14 councils have worked together to formulate a set of joint proposals and have a coordinated, county-wide programme of public and stakeholder engagement.

We ran a resident survey in September and October 2025, have met with key partners and have engaged with communities through our usual engagement routes to ensure the voices of local people and organisations are central to business case development.

Reflecting local identity and fostering a shared vision across the county requires meaningful engagement with residents, businesses and key stakeholder groups at every stage of the process.

This engagement activity aligns with the political commitment across Kent to meaningfully involve communities in shaping their future governance while exceeding what is required under MHCLG guidance.

While MHCLG has not prescribed the extent of engagement, Kent's Leaders chose to pursue a proactive and inclusive approach.

The process has been informed by best practice from previous LGR areas, advice from the cross-Kent communications group and feedback from council Chiefs Executives and Leaders.

We gathered the views of more than 2,000 stakeholders to understand reflections, including:

- Kent residents
- businesses
- community groups
- councillors and officers
- Members of Parliament
- strategic partners across housing, health, emergency services, social care and safeguarding, education and skills, economic development, government, public sector and volunteering

Overview of engagement activities:

A) Standardised resident survey
B) Stakeholder engagement programme

The feedback from the public survey and stakeholder engagement has been analysed by the Canterbury City Council Policy and Communications team, which led the communications and engagement workstream. The findings are reflected below and throughout this proposal.

A) Standardised resident survey

A standardised resident survey, agreed across all Kent councils, was launched during the engagement period.

This consistency ensures data comparability across districts and enables the creation of both Kent-wide and locally-specific insights.

The survey aimed to capture residents' views on their local identity, service expectations and priorities for the future shape of local government.

These insights have informed the business cases and local decision-making processes within each council.

The survey received 2,107 responses, which includes written responses and survey responses.

B) Stakeholder engagement programme

In addition, a joint stakeholder engagement programme has been developed, via a coordinated letter sent on behalf of all Kent councils to a wide-ranging list of county-level stakeholders.

Each council has also engaged with its own networks including parish and town councils, voluntary and community organisations, businesses and sector-specific partnerships.

Councils were encouraged to host meetings and discussions to ensure stakeholders could explore the implications of different governance models and offer their perspectives on how local identity and service delivery can be best preserved and enhanced.

Across all Kent councils, priority strategic partners* have been engaged in dedicated workshops to understand key reflections, including:

- challenges that can be addressed through reorganisation
- opportunities to be realised through reorganisation
- issues that may arise through reorganisation that need to be mitigated

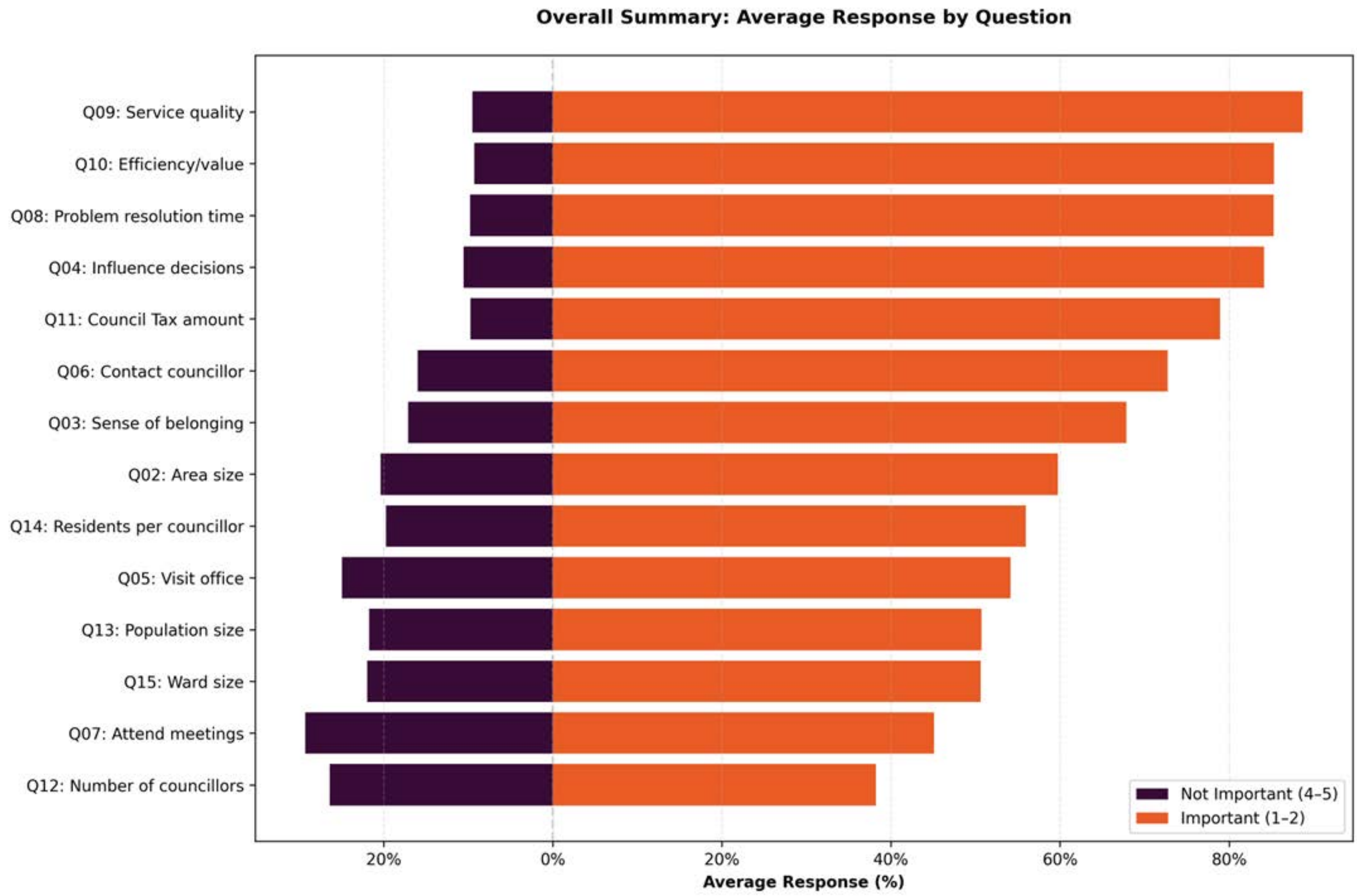
Table 25: **Priority key strategic partners*

Health	• NHS Kent and Medway Integrated Care Board (ICB)
	• Kent Integrated Care Alliance
	• NHS Provider Trusts
	    o East Kent Hospitals University NHS Foundation Trust
	    o Maidstone and Tunbridge Wells NHS Trust
	    o Medway NHS Foundation Trust
	    o Kent Community Health NHS Foundation Trust
	    o Kent and Medway NHS and Social Care Partnership Trust

Emergency services	• Kent Police • Kent Police and Crime Commissioner • South East Coast Ambulance Service
Social care and safeguarding	• Chairs of Safeguarding Boards – Adults and Children's • Chairs of any Partnership Board • Chair of Kent and Medway Resilience Forum
Education and skills	• University of Kent • Canterbury Christ Church University • University of Greenwich • University for the Creative Arts • FE colleges
Economic development	• Kent Invicta Chamber of Commerce • Federation of Small Businesses
Government and Public Sector Partners	• Department for Work and Pensions (DWP) • National Highways • Port health authorities • Housing associations
Volunteering	• VCSE sector representation

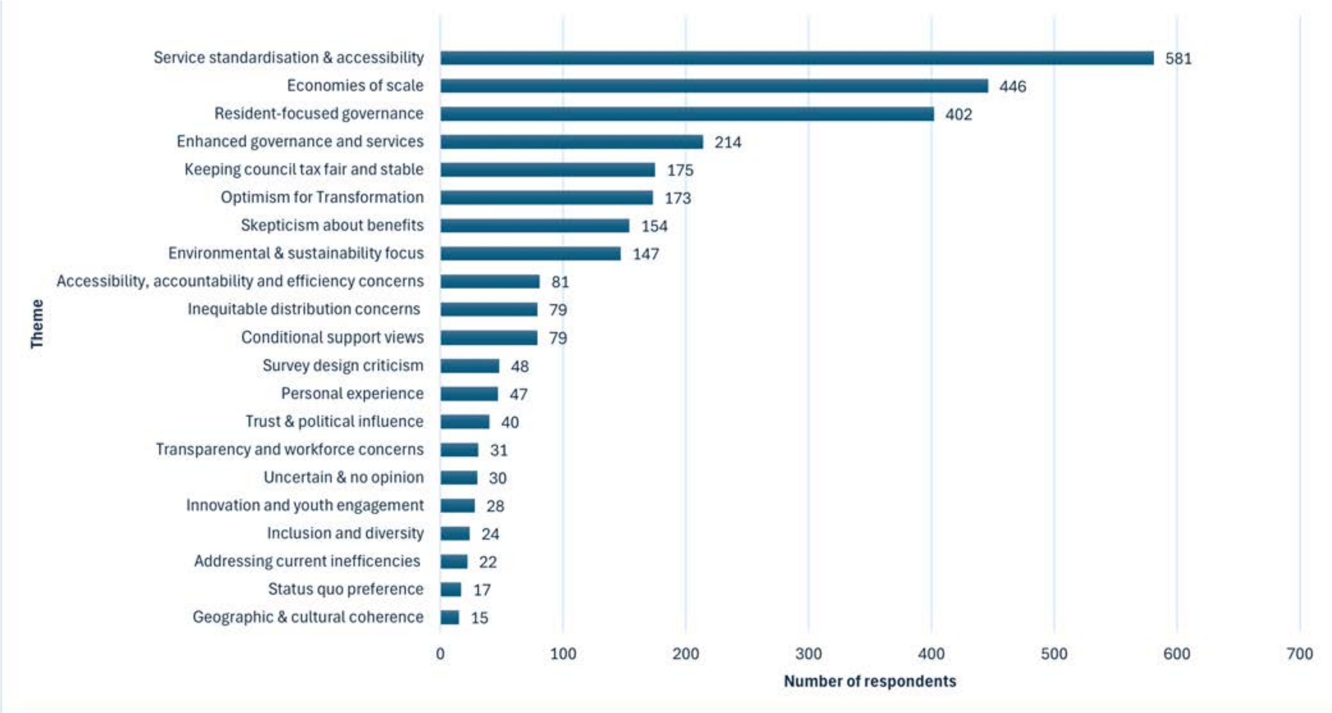
The perspective of Kent residents

Figure 15: *What Kent residents value most about their local council*



Overall, the highest-rated aspects were service quality, efficiency and value, problem resolution time, decision-making influence and council tax amount.

Figure 16: *Opportunities identified by Kent residents from local government reorganisation*

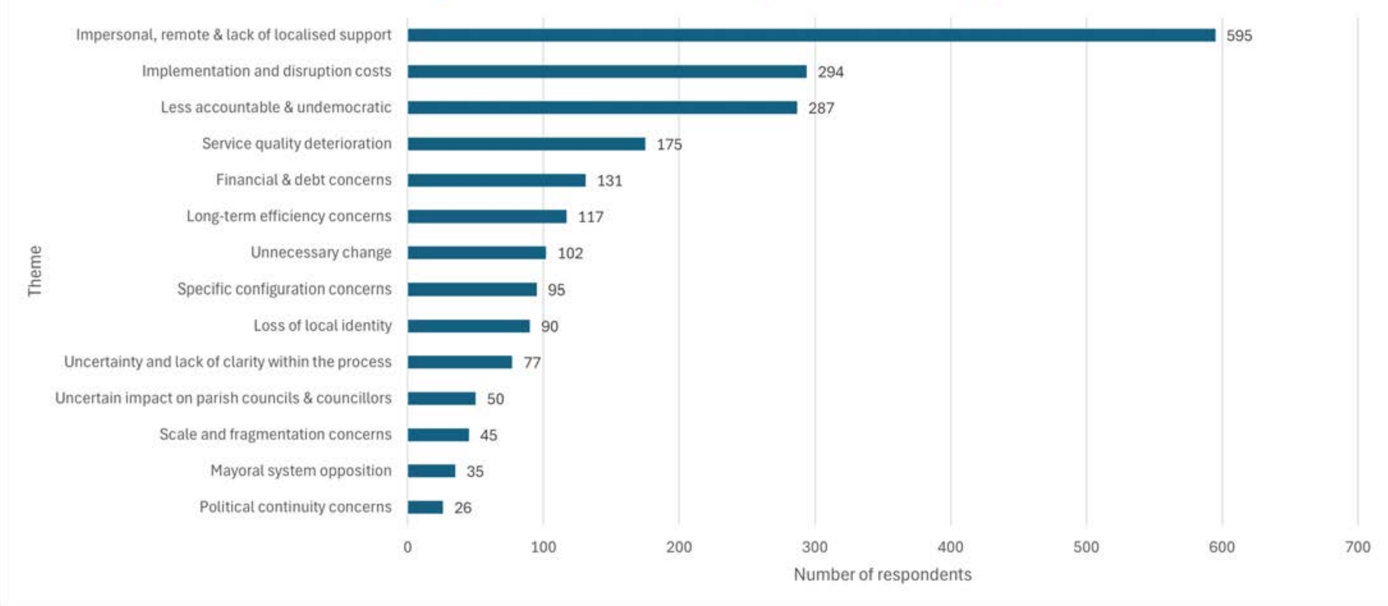


Respondents saw service standardisation and accessibility as the leading opportunity of reorganisations, viewing it as a chance to simplify local government, clarify responsibilities and make joined-up services more accessible and responsible.

Participants identified economies of scale as another key opportunity of reorganisation, seeing it as a means to streamline operations, reduce bureaucracy and deliver better value and a fairer balance of power across areas.

"This is a generational opportunity, use it wisely or it will slip away like the last one… this is a chance to make a council work in new and innovative ways delivering services fit for 2025 not 1980." – Kent resident

Figure 17: *Kent residents' concerns about local government reorganisation*



Residents' strongest concern was the risk of governance becoming more impersonal and remote with fears that larger councils could become disconnected from communities, particularly in rural and coastal areas.

Participants questioned whether the promised efficiencies would outweigh the significant costs of restructuring and expressed concern about potential service disruption.

There was some concern that reorganisation will undermine local democracy and some fears that larger councils could weaken local accountability, reduce democratic representation and limit residents' ability to influence decisions that affect their communities.

"[I am concerned by] loss of local connection, information and knowledge… Impersonal services due to number of residents, vulnerable residents suffering and likely to be left behind. Reduced opportunities for employment locally with risk of redundancies and increasing levels of unemployment. Potential increase in levels of vulnerabilities and failings of individuals, households and families mental health, safeguarding and domestic abuse." – Kent resident

Overview of key themes that emerged from the resident research:

1. Service quality is a top priority for residents, yet many are concerned that services will deteriorate throughout the reorganisation process

Service quality ranked as residents' top priority with 81.4% rating it very important and a further 7.5% as important, underlining the need to maintain reliable everyday services through LGR.

Respondents saw service standardisation and accessibility as the leading opportunity of reorganisations, viewing it as a chance to simplify local government, clarify responsibilities and make joined-up services more accessible and responsible.

Overall, there is an expectation for high quality, reliable and effective council services.

Residents want services to be responsible to community needs and to support local economies.

There was a strong desire to see improvements in coordination of local services, particularly those that impact daily life such as waste collection, highways, social care and community safety.

"My main priority is to have big enough bins that are emptied on a weekly basis. This is very important to me and my family due to the amount of medical waste we have as a result of chronic illness." – Kent resident

Some residents expressed concern LGR will result in a decline in service quality across the board, driven primarily by cost cutting measures rather than genuine efficiency improvements.

There is some anxiety essential services including social care, special educational, needs, waste collection and community facilities will suffer as budgets are spread thinner across large populations and competing priorities.

Many respondents noted any short-term financial savings from reorganisation will be offset by transition costs and the loss of established relationships and local expertise, ultimately leaving residents paying more through increased council tax while receiving demonstrated demonstrably worse services.

"I work in education in Medway, we also have pupils who reside in Kent. From my experience, current services for education (especially SEND) and social care provision are poor and do not meet need" - Kent resident

2. <u>Service quality and input into decision-making is of particular importance for residents with disabilities</u>

Residents with disabilities and those with long-term health conditions prioritised both service quality and having meaningful influence over decisions, reflecting a desire for responsive, inclusive services and concerns about accessibility, loss of voice and potential disruption to existing support.

While service quality remains priority for people who consider themselves to have a disability or a long-term health condition, they also put a strong emphasis on influencing decisions.

This may suggest disabled residents value both swift service resolution and meaningful say in decisions affecting them, possibly reflecting experiences of services sometimes being designed without adequate input from people with disabilities.

When asked to outline their concerns about local government reorganisation, one of the respondents who considered themselves to have a disability or a long-term health condition said:

"Ability to be heard and to influence decision making in a much larger council area; The loss of a local Council making decisions for local people; The possibility of the Council offices being located somewhere that I can't get to (I don't drive); The possibility of losing services currently provided." - Kent resident

Residents with disabilities want to ensure their voices are included in the redesign process to ensure their perspectives can shape services and meaningfully influence decision-making.

"As a disabled resident who is passionate about shaping policy, I believe local government reorganisation presents a vital opportunity to build a more inclusive and accessible system… I hope any new council structure prioritises digital accessibility, transparent decision-making, and proactive outreach to underrepresented voices. It's essential that disabled people can contact councillors easily, attend meetings remotely, and have their concerns heard without barriers. Efficiency and value for money are important, but so is ensuring that no one is left behind. I urge decision-makers to design councils that reflect the diversity of their residents—not just in services, but in how they engage and empower us. This reorganisation is also a chance to improve accountability."- Kent resident

See Section 4: Criteria 3 for further detail on the option-specific support high quality and sustainable service delivery.

3. <u>Residents want to protect local identity, connection to community and democratic representation</u>

Kent residents feel connected to their respective towns, villages and districts and want this to be reflected in new council arrangements.

67% of residents said a sense of belonging to their council area was important.

However, participants had concerns LGR will erode the distinct identities and characters of individual areas, towns and communities across Kent.

Residents' strongest concern was the risk of governance becoming more impersonal and remote.

Residents were worried councillors representing significantly larger populations will lack local knowledge and understanding of area-specific issues, making it harder for residents to reach their representatives and have their voices heard.

Some comments highlight fears that some areas, particularly rural and coastal communities, will be forgotten and abandoned in favour of larger urban areas.

"Living in a rural area I consider that at larger authority including larger populated areas will mean our needs and wants are ignored." - Kent resident

There is a desire for strong local representation.

Residents want to feel connected to their councillors and have confidence their voices will be heard and can shape their neighbourhoods.

68% of residents rated the ability to influence local decisions as very important.

Clear access to decision-makers and accountability in council actions was also highly valued by residents.

Residents emphasised the importance of maintaining a clear local voice in decision making and expressed concerns that larger councils may become distant and disconnected from the communities they serve.

"If authorities are too large then councillors will have insufficient knowledge about the people they are representing and not be seen as part of their local community." - Kent resident

Many expressed anxiety about the ability of a remote council to address everyday local concerns, with some noting that they already struggle to contact their current MPs due to large electorates and fear this problem will worsen.

There was concern amongst some residents that council offices may become physically inaccessible and that service quality may decline as decision-making becomes centralised among people unfamiliar with local needs and contexts.

"Residents will have less representation and therefore local concerns or issues will not be sufficiently represented or addressed." - Kent Resident

Notably, the ability to visit a council office, population size, ward size, attendance at council meetings and number of councillors were considered least important to residents when compared to other factors like service quality.

See Section 4: Criteria 1 for further detail on the model defines functional and coherent geographies and Section 4: Criteria 4 for further detail on how the model maintains local identity.

4. <u>Residents view local government reorganisation as an opportunity to deliver better economies of scale value for money, but many are concerned with the cost to transition</u>

Efficiency and value for money was the second highest priority among residents, with 74.3% rating it very important and 12.3% as important and residents expressing anxiety about costs and desire that promised savings materialise in practice.

"The chance to simplify structures, reduce duplication, and make better use of resources across Kent and Medway. Clearer accountability for residents, with one council responsible for all services rather than multiple tiers… [as well as] efficiency and savings." - Kent resident

Many participants viewed the reorganisation process as an opportunity to deliver more efficient, streamlined local government services that ultimately deliver better value for money for residents.

There was an expectation that reorganisation should bring economies of scale, reduce bureaucracy and ensure fairer balance of power across areas.

"A single, unified authority could make it easier for people to understand who to turn to, and ensure that concerns are addressed without being passed between layers of bureaucracy." - Kent resident

While many residents are hopeful about the potential benefits of reorganisation, some are concerned about the financial and operational cost of reorganisation, with many questioning whether the promised savings will ever materialise.

Participants were sceptical about transition costs, redundancies and systemic integration outweighing any efficiency gains, ultimately resulting in higher council tax for residents without any service improvements.

Comments highlight substantial anticipated expenses including restructuring, retaining and redundancy packages, IT system migrations, rebranding, new office infrastructure and external consultant fees.

"My concerns relate to time and cost and how and the cost to Council Tax payers. With any reorganisation the short-term risk is always upheaval, delays in each council dealing with Business as unusual." - Kent resident

See Section 4: Criteria 2 for further detail on how the model supports resilient and efficient finances.

The perspective of Kent partners and organisations

There were shared perspectives across partner organisations and businesses:

1. There is genuine recognition among many stakeholders that reorganisation could unlock efficiencies.

Pooling resources, efficiency savings, reduced duplication, improved integration, stronger local voice, improved collaboration, joined-up policy making and clearer accountability were all highly referenced by stakeholders as potential benefits of reorganisation.

In particular, participants saw potential for improved mechanisms for communities to be heard, through co-production, forums or strengthened parish/town councils.

Economies of scale were also highly referenced. Participants acknowledged larger councils could enable efficiencies in back-office services, contracts and procurement, as well as recruitment and retention of specialist staff.

"What problems could be fixed by reorganisation and why? Duplication of services and confusion about which tier of local government is responsible for certain functions could be reduced. Larger councils may be able to pool resources to tackle county-wide issues such as major infrastructure or environmental challenges." - Kent partner

2. Many stakeholders were concerned that reorganisation could exacerbate inequalities

Many stakeholders warned of risks relating to reduced local representation, loss of community identity, widening inequality, unresolved financial pressures and disruption to housing and estate management during transition.

Canterbury Foodbank raised concerns that reorganisation could worsen east/west inequality by separating poorer coastal areas from wealthier western districts.

They highlight new unitary authorities need strong, well-funded regional support to address inequalities.

"There is a strong risk that unitary reorganisation will divide richer and poorer areas, so that the potential to cross-subsidise between areas of high social need (located mainly in the existing Thanet, Dovel, Folkestone and Hythe and Swale districts) and richer areas (Sevenoaks, Tonbridge, Tunbridge Wells) is lost. At the same time opportunities to create high value-added employment in the poorer areas, whose economies currently rest on low-paid services (tourism, hospitality, social care) and primary sector agriculture will not exist." - Kent partner

A concern of equality was also raised by a councillor who questions financial sustainability for the East Kent council, which concentrates the poorest authorities with highest service costs and lowest tax income.

There are concerns about resource allocation precision avoiding overlooked small, deprived areas and emphasis that local access points are essential for digitally-excluded residents.

3. <u>There were concerns about loss of in-house heritage expertise and local heritage services.</u>

Multiple stakeholders worried that community assets like parks, libraries or historic buildings could be sold off or transferred without adequate funding or consideration of their community.

Many also highlighted that geography should not be the sole driver of reorganisation.

Cultural identity, history, and existing community synergies were seen as equally important drivers e.g. coastal towns sharing challenges.

One stakeholder noted Canterbury's historic significance and other unique identities should be preserved:

"That resources that people hold dear, such as the heritage in Canterbury or the coastal strip from Reculver to Seasalter, are not cherished in the same way in the unitary as they are in the district council." - Kent partner

Table 26: *Nuanced feedback from stakeholders*

Grouping	Key reflections from LGR	Verbatims
Health	• Stakeholders from the health sector emphasised opportunities for better integration if local government boundaries align with health and care partnership areas. The NHS trusts see potential for more seamless join working in social care, public health and prevention.	*"...we would value geographical alignment with NHS boundaries wherever possible and reasonable. Given that poor health is so strongly influenced by social factors, alignment facilitates coordination of approach."*
Parish Councils	• Parish councils highlighted community identity and local knowledge are essential to resident wellbeing, concerns that extend to fears about lost heritage expertise, potential sale of community assets and diluted local oversight over planning and service decisions. • Some stakeholders from parish councils emphasised parishes provide valued highly local, responsive community services and argue community identity is vital to resident wellbeing. • Some acknowledged reorganisation could bring efficiency and clarity benefits, but stress local democracy or community identity should not be sacrificed in pursuit of these. • They also emphasised parishes need proper recognition, empowerment and funding.	*"Parish Councils occupy a unique and invaluable position within their communities. As elected representatives who live and work within the areas they serve, Parish Councillors have a direct connection with local residents and a deep understanding of their needs and concerns."*
Councillors	• Councillors were concerned that reduced councillor numbers and increased	*"I am very concerned about using strategic planning and transport*

	responsibilities may deter candidates and reduce local representation and loss of local knowledge among councillors. Residents • Some respondents opposed abolishing district councils and list risks such as service disruption, higher costs and weaker democracy. • A concern around equality was raised by a councillor who questioned the financial sustainability for an East Kent council concentrating poorest authorities with highest service costs and lowest tax income.	*links on a wider scale to connect people to more places of value, build sustainable homes and vital infrastructure and bolster local growth. It is also important to me that we maintain local representation and community cohesion."*
Housing	• Stakeholders from the housing sector were concerned about service disruption during transition, delays to housebuilding, confusion over social housing priorities and potential disaggregation of county-wide social care services. • An estate manager argued property management requires local knowledge and RICS regulations require surveyors to practice in known area and questions whether someone unfamiliar with an area can manage valuations accurately, maintain estates or prevent loss of land through statutory rights.	*"Potential problems which could be created… Delays to housebuilding if newly-created unitary authorities opt to abandon adopted or emerging local plans in favour of developing their own; Confusion amongst residents on the housing waiting list over how local government reorganisation might affect their priority for social housing…"*
Education and skills	• Further education leaders highlighted possibilities for coherent county-wide skills strategies and apprenticeship coordination that could better serve small-sized medium enterprises across Kent. • However, among other things, they also highlighted that the reorganisation may have implications for learners with high needs.	*"Ensuring consistency, equity, and adequate provision will require any new local authorities to have the capacity and expertise to properly co-ordinate and oversee High Needs responsibilities."*

Support from partner organisations for Option 3A

The three-unitary model is supported by a number of partners who have been consulted.

There is broad endorsement of this model from:

- NHS Kent & Medway – highlighting that the model minimises fragmentation and reduces infrastructure costs
- Kent Police and Crime Commissioner – who prefers a three-unitary model as most closely aligning with existing police command units and as minimising cost and service impact
- Kent Fire and Rescue – citing the potential to improve efficiency, streamline service delivery, and enhance regional economic planning
- Visit Kent and other stakeholders

This support reflects a shared strategic vision among key regional stakeholders, who emphasise the benefits of a three-unitary model in terms of operational alignment, cost-effectiveness, and service continuity.

NHS Kent and Medway stated in their consultation response that their **"preference would be for the smallest number of unitary councils to minimise infrastructure costs and the risk of fragmenting services."**

Similarly, the Kent Police and Crime Commissioner noted, **"From the point of view of how policing is organised in Kent, I believe that if local government re-organisation is required, it should be with three unitary authorities, built on the existing District council boundaries and Kent Police's Divisional structure."**

The consistent preference for Option 3A across emergency services and public sector partners underscores its potential to deliver integrated services and reduce duplication from aligning with existing administrative and operational boundaries.

Preserving local identity, culture and historical significance

Criteria 4b. Proposals should consider issues of local identity and cultural and historic importance

Option 3A creates three future councils each reflecting distinct cultural, historic, and economic identities. It supports local communities, coastal economies, and natural travel and service patterns to strengthen regional identity.

Maintaining local identity across Kent

Kent is a large and diverse region with a rich history, strong civic traditions and distinct local identities.

From coastal towns and rural villages to historic market centres and modern urban hubs, the geography and culture of Kent have shaped how communities live, work and relate to their local institutions.

We know from engagement with our residents they associate their identify with their local town and not their local council.

They do not live their lives according to administrative boundaries.

Their daily experience is shaped by functional geographies – commuting patterns, access to hospitals, schools, and community services – that often extend beyond council borders.

The lived reality is that every road, bus route, and service network crosses boundaries.

New councils must recognise this and work together to create coherent, strategic plans that reflect how people move and access services.

This includes transport, health and preventative care, which are most effective when delivered through local, community-based interventions.

New councils must support both strategic coordination and planning across council boundaries and local responsiveness.

Placeholder for collage showing geographical identity of Kent

Option 3A: Three councils with clear identities

Option 3A demonstrates strong alignment with established and recognisable historic, cultural, and service geographies, including the management of certain pan-county service structures.

It supports existing identities and ways of living by grouping communities with shared characteristics, such as those along the coast and across the Thames Estuary.

Option 3A also recognises the economic importance of coastal leisure activities and other tourism attractions, which are integral to the local economy. It strikes an effective balance between delivering value for money and maintaining a scale that is not too large or remote, ensuring accessibility and engagement for both residents and partners.

Furthermore, the model reflects natural economic flows, including shared travel-to-work patterns, housing markets, and health service areas. It strengthens alignment with acute health trusts, strategic highway networks, and coastal management frameworks. These factors contribute to a stronger regional identity and improved service cohesion, particularly across East Kent and other coastal communities.

Table 27: *Identity and culture for each council area*

North Kent: • Dartford • Gravesham • Medway • Swale	**A diverse, regenerated region blending historic heritage with modern development, characterised by Thames Estuary landscapes, vibrant cultural communities, and a legacy of industry transformed into thriving modern hubs.** • Characterised by coastal and estuarine landscapes along the Thames and Medway rivers with urban and industrial areas. • Reflects natural groupings of Thames Estuary communities. • Historically, North Kent was an industrial area with a strong presence in building materials, quarrying, naval shipyards, and papermaking. While these traditional industries have undergone restructuring, the region has diversified and seen successful regeneration projects in areas like Bluewater, Chatham Maritime, and Rochester Riverside. • Notable for its heritage, the area includes the former home of Charles Dickens, the first Victorian seaside destination for visitors from London, and landmarks such as Rochester Cathedral, Rochester Castle, the Historic Dockyard, as well as the ongoing operation of the Shepherd Neame Brewery, Britain's oldest brewer. • The area is one of the most culturally diverse. In Gravesham nearly 1 in 3 people identifying as non-white British, and 52% of school age children in Dartford are now classified as non-white British. The urban centres of Rochester, Chatham and Gillingham have also been identified as having significant Asian, Black and Eastern European communities. • Dartford has one of the youngest median ages outside London and university cities, at 37.2 years in 2022. Gravesham also has a comparatively young population. • Medway is home to a shared university campus known as the ‘Universities of Medway’, with presence of University of Kent, University of Greenwich and Canterbury Christ Church University.
West Kent: • Maidstone • Sevenoaks • Tonbridge & Malling	**A scenic region of chalk downlands and wooded valleys, steeped in heritage with castles, historic towns, and cultural landmarks, protected by extensive Green Belt and National Landscapes.** • The area’s natural environment is defined by hilly, wooded countryside with chalk downlands, valleys, and Areas of Outstanding

• Tunbridge Wells	Natural Beauty with two National Landscapes – Kent Downs and High Weald. • Covering 92% of its District, Sevenoaks has one of the highest levels of Green Belt in the UK and includes sections of both Kent Downs and High Weald National Landscapes. • The region is rich in history from its many ancient sites such as Oldbury Hill and Eccles Roman Villa to medieval castles and landmarks including Hever Castle and Leeds Castle, through to Chartwell House (home of Winston Churchill). • Historic villages and towns are found throughout the region featuring timber-framed buildings, Georgian pubs, and medieval architecture. • West Kent is home to Grade I listed landmarks such as Penshurst Place, Ightham Mote, Scotney Castle, and the Archbishop's Palace. • Cultural hubs are found throughout the region and include The Pantiles in Royal Tunbridge Wells, The Amelia Scott centre, The Stag Theatre in Sevenoaks, and Maidstone Studios – celebrating 40 years of broadcast excellence. • This natural environment, historic buildings and cultural variety has shaped the identities of the communities within the West Kent region as well as supporting strong creative and tourist industries. •
East Kent: • Ashford • Canterbury • Dover • Folkestone & Hythe • Thanet	**A region defined by strong coastal and rural identities with rich natural and cultural heritage. Its historic significance, iconic landscapes, and educational institutions reinforce its role as a centre of heritage and learning.** • Strong coastal and rural identities, with landscapes ranging from chalk cliffs to coastal plains and downs. • The region's coastline features historic towns such as Herne Bay, Whitstable, Deal, Sandwich, Folkestone, Hythe, Margate, Ramsgate, and Broadstairs, offering tourism opportunities. • This area hosts four of the five head Cinque Ports as a well-defined historic confederation of south-east English towns (Dover, Hythe, Romney, and Sandwich), as well as five of the nine limb ports (Tenterden, Folkestone, Lydd, Deal and Margate). The network remains active and gives the area a unique sense of place with a deep cultural and heritage identity dating back to the 11th century. • Canterbury is home to four higher/further education institutions and significant cultural heritage, including UNESCO World Heritage Sites Canterbury Cathedral, St Augustine's Abbey, and St Martin's Church. • As well as it's thriving port, Dover has rich natural and cultural heritage with Dover Castle and the iconic White Cliffs. • Folkestone & Hythe combines vibrant coastal communities with rich agricultural land on the Romney Marsh and parts of the Kent Downs AONB. • Other cultural assets include Margate's Turner Contemporary and creative quarter, Folkestone's Creative Foundation, Marlowe Theatre, and Dover Castle, English Heritage's most popular visitor destination.

	• The area's natural and built heritage is among the strongest in Kent, supporting tourism and creative industries.

Criteria 5: Supporting strategic devolution and regional priorities

This section includes:

Unlocking the devolution vision in Kent

Criteria 5a. Proposals will need to consider and set out for areas where there is already a Combined Authority (CA) or a Combined County Authority (CCA) established or a decision has been taken by Government to work with the area to establish one, how that institution and its governance arrangements will need to change to continue to function effectively; and set out clearly (where applicable) whether this proposal is supported by the CA/CCA /Mayor.

Criteria 5b. Where no CA or CCA is already established or agreed then the proposal should set out how it will help unlock devolution.

All of Kent's councils recognise the critical need to devolve powers to a strategic authority to unlock public sector reform and empower decisions about Kent to be made in Kent. The vital difference that devolution would make to economic growth, housing delivery, education and skills and transport, and the benefits it would bring across Kent in terms of accelerating public service reform, cannot be underestimated. This is a once-in-a-generation opportunity to improve life chances for the residents and businesses of Kent and Medway.

A devolution deal for Kent

We were disappointed to not be accepted onto the Devolution Priority Programme (DPP) and have been pressing the case with ministers and MHCLG to understand the path towards devolution in Kent.

This is particularly important in light of the critical role Kent plays in national infrastructure and border management, and the opportunities that arise from a strategic county-wide approach being taken on economic growth, education and skills.

Partner support

Key local public sector partners - the Chief Executives and Chairs of the ICB, health and care partnerships and acute trusts, the Chancellors/Vice Chancellors of the University of Kent, Canterbury Christ Church University and Greenwich University which has a campus within Kent, the Chairs of the Kent and Medway Economic Partnership, Business Advisory Board and Kent Invicta Chamber, the Chief Executives of Eurotunnel and the Port of Dover and the Chairs of the Kent Housing Group and Kent Developers Group - all share our concerns that reorganisation in Kent without devolution would result in a piecemeal approach and sub-optimal transformation.

Timelines that work for both priorities

Aligning the timeline for the creation of a strategic authority is key to avoiding a double reorganisation by which we establish unitary authorities in April 2028 and either have to operate hosted services through localised arrangements only to reaggregate services into a strategic authority shortly after.

This two-stage piecemeal approach would generate additional cost, complexity and create further disruption to staff and services as well as weaken public clarity on the nature and role of local government in delivering national objectives and policies.

Kent's district and borough councils and Medway strongly support establishing a Mayoral Strategic Authority at the first available opportunity in April 2028 to operate alongside the new unitary authorities.

Government support and agreement for devolution to be aligned with local government reorganisation in Kent will enable effective transition planning of key services resulting in a seamless transition, enabling synergies in programme management and leadership capacity while providing clarity to residents and partners regarding how local government and devolution opportunities will be embraced in Kent.

Clarity for partners is critical given our deep ambitions regarding public service reform at the earliest opportunity.

This requires consistency, developed relationships and focus on service delivery rather than ongoing structural change that is not focused on achieving outcomes.

Kent is a natural fit for devolution as critical partners already work coterminously with the footprint of the strategic authority including Kent Police and the Police and Crime Commissioner, Kent Fire and Rescue Service, the integrated care board and many voluntary and community service organisations.

A failure to bring forward devolution simultaneously alongside reorganisation in Kent represents a significant additional cost pressure through missed opportunities, delay, disruption and duplication of effort.

The proposals for LGR in Kent and Medway directly address the rationale given by MHCLG for excluding Kent and Medway from the DPP, namely addressing population disparity imbalance between the area of Kent and the unitary authority of Medway.

We urge ministers to accelerate devolution in Kent to meet the timescale we have proposed as this will deliver the greatest opportunity for successful public sector reform.

Enabling strategic leadership through a regional governance model

A strategic authority across Kent and Medway provides a real opportunity to strengthen Kent as a whole and to focus the role of unitary authorities on their delivery role.

The strategic authority will take a strategic role across Kent including:

- transport and infrastructure, including the Local Transport Plan and management of critical national infrastructure including the port at Dover and Eurotunnel at Folkestone;
- economic development and regeneration, including the Local Growth Plan;
- housing and strategic planning, including the Spatial Development Strategy;
- adult education, skills and job support;
- the environment and net zero;
- health including the ICB, wellbeing and public service reform; and
- the Police and Crime Commissioner and fire and rescue functions.

A Mayor for Kent will provide a clear single voice for the region, support inward investment and ensure the county punches its weight on the national and international stages.

Kent requires a voice on the Council of the Nations and Regions, not only for its size but also for the critical role it plays in national infrastructure, travel and borders.

This high-profile leadership role with government will support growth in Kent and, through the national role, address a gap that would otherwise be apparent in addressing national priorities.

The future councils will be balanced and powerful constituent authorities on the strategic authority, alongside the mayor, and will provide the voice for their distinct economic areas.

We know from existing combined authorities that a single strategic approach does not mean that one size fits all.

A Kent strategic authority will also enable the councils to focus on effective local delivery and deep public service reform on an appropriate footprint.

The councils will have different strengths and needs, local partnerships and communities they represent.

A strategic authority will provide clear overall direction and coherence, enabling councils to focus delivery in their local area which will mean they can become more agile through a place-based approach within a larger strategic framework.

Progress towards devolution

Despite not being on the DPP, we have continued to develop our approach to devolution in Kent to enable us to rapidly take advantage of the opportunity when provided.

We have started work to agree our vision and strategic intent regarding devolution and the role and purpose of the strategic authority in delivering it, and the most effective relationship required with the constituent councils.

We are refreshing our shared priorities by identifying critical strategic challenges and opportunities requiring a strategic and Kent-wide approach.

Following MHCLG support for our devolution approach, we will finalise the preferred structure and identify the processes and resources required to integrate into the combined LGR and devolution implementation programme.

This will enable us to prepare the ground for the Mayoral Strategic Authority, develop the early investment programme and begin development of the statutory policy framework.

This will set robust foundations for the mayoral election and strategic authority to vest in April 2028.

Devolution governance: the argument for Option 3A

Option 3A proposes a three-unitary model for Kent that supports strategic devolution and regional priorities through a streamlined and balanced governance structure. By establishing three unitary authorities with proportionate population sizes, the model ensures equitable representation across the county while maintaining the capacity for strong regional partnerships.

This structure simplifies governance and enhances leadership clarity, enabling Kent to engage more effectively with central government and regional bodies. A unified and effective voice on strategic issues such as infrastructure, housing, economic development and supporting integration with preventative and integrated care, is more achievable with fewer, larger councils that can coordinate across broader functional economic areas and transport corridors. This alignment improves service delivery, reduces duplication, and strengthens Kent's position in regional devolution discussions.

The proposal is built on a foundation of collaboration among Kent's councils, reflecting a shared commitment to reform and a willingness to work together toward common goals. This cooperative approach fosters trust and transparency in decision-making, reinforcing Kent's credibility as a proactive and capable regional partner.

Option 3A also embraces place-based leadership by preserving local identities within each unitary authority. The three councils are designed to be large enough to deliver services efficiently and at scale yet remain sufficiently connected to their communities to ensure responsive and locally tailored governance. This balance supports neighbourhood-level engagement while advancing broader strategic ambitions.

By aligning Kent's geography with its functional realities – such as transport corridors, environmental zones, and economic clusters – Option 3A creates a governance structure well-suited to managing land use, planning, infrastructure, and environmental priorities across the county.

More than any other, Option 3A balances opportunity and risk across the councils, ensuring that no single area bears disproportionate financial or social challenges. This equitable distribution of responsibilities and opportunities supports sustainable growth and resilience across Kent.

Population sizes that support devolution

Criteria 5c. Proposals should ensure there are sensible population size ratios between local authorities and any strategic authority, with timelines that work for both priorities

Option 3A meets government criteria by creating balanced and sufficiently sized authorities. It supports effective devolution by enabling strong collaboration with a Mayoral Strategic Authority and promotes equitable, efficient local governance.

Population sizes: the argument for Option 3A

Option 3A provides a strong foundation for devolution by aligning with functional economic areas and sensible planning geographies. Each unitary authority offers sufficient scale and capacity to engage directly with a Mayoral Strategic Authority (MSA), enabling effective delivery of devolution priorities.

This model creates three councils with the most balanced population sizes of the models proposed and is the only model that meets the Government's guidance of 500,000 populations in each of its unitary areas.

The balanced population ratios support equal representation and encourage an equitable partnership within the strategic authority, fostering collaborative governance and strengthened local delivery under the MSA framework.

Establishing three councils across Kent and Medway, each grounded in the region's real communities and places, strikes the right balance between sufficient scale and local representation, ensuring that each authority truly reflects the communities it serves.

Criteria 6: Enabling stronger community engagement and neighbourhood empowerment

This section includes:

Community engagement and neighbourhood empowerment across Kent

Criteria 6a. Proposals will need to explain plans to make sure that communities are engaged

Criteria 6b. Where there are already arrangements in place it should be explained how these will enable strong community engagement.

Community engagement and neighbourhood empowerment are central to achieving our LGR objectives in Kent. Neighbourhood Area Committees (NACs) represent a powerful opportunity to transform how communities take part in local decision-making.

Through LGR in Kent, communities will have a stronger voice within their new councils and with partners. We will ensure local insights shape discussions between unitary authorities and service providers, while building on and strengthening existing approaches that are already working well.

Effective local government is a function of the relationships between elected members, service provision, residents and communities.

Empowered, engaged communities know who they are and what they need.

They know what services are available in their area and they expect to co-design and shape those services.

They see and know their councillors and local service providers.

And they are not afraid to share their perspectives and they are confident they will be heard.

Councils at all levels across Kent and Medway have longstanding commitments to community engagement via county-wide initiatives such as Crowdfund Kent, district and borough forums like the Thanet Youth Council and direct grants for local organisations from parish and town councils like Faversham.

At the heart of this commitment lies a requirement to use LGR as an opportunity to work differently by tempering the tension between the economies and resilience that come with delivering at scale and the granular responsiveness and relevance that thrives on close working with each community.

Having fewer, single-tier councils offers greater opportunities for scaled models, consistent investment of resources and potentially smoother co-operation with statutory partners.

Conversely, a larger number of smaller councils provides a stronger basis to co-design locally-specific services that adapt to communities' distinct needs and priorities.

Regardless of the model selected by government, councils will deliver stronger community engagement and enable genuine neighbourhood empowerment, bringing decisions closer to communities and ensuring services are relevant, joined-up and efficient.

To do this, Kent recognises it requires a new vehicle for community engagement that is at once locally rooted and strategically impactful.

This is the Neighbourhood Area Committee (NAC), a neighbourhood hub for partnership working and co-production that unites communities, elected unitary and town and parish councillors and service partners. NACs, working alongside service providers as well as unitary and town and parish councillors, will enable LGR to realise the generational opportunity to improve community engagement and neighbourhood empowerment.

Alongside the major changes to our council structures, this vehicle will support communities to be closer, more informed and more empowered in the decisions affecting them.

The participation of services will ensure NACs convert local perspectives into meaningful influence, while representation from town and parish councillors will allow close coordination and alignment with local governance and priorities.

Therefore, we have assessed our plans to enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment using three key criteria:

- will the reforms enable communities to make their voice heard by their unitary authority and by partners delivering services?
- will they enable unitary authorities to work effectively with service providers in response to insights from community engagement?
- will they allow unitary authorities to build effectively on community engagement approaches that are already working?

Neighbourhood Area Committees (NACs)

Criteria 6a: Proposals will need to explain plans to make sure that communities are engaged.

Criteria 6b: Where there are already arrangements in place it should be explained how these will enable strong community engagement.

Neighbourhood Area Committees (NACs) are Kent's preferred model for strengthening local engagement through LGR. Led by ward councillors, NACs connect communities with services and decision-making, adapting to local needs and ambitions. They integrate town and parish councils, statutory services, and community groups. Their success will depend on inclusive engagement, strong local partnerships and responsiveness to community priorities.

Role of NACs

Central government has made clear that Neighbourhood Area Committees (NACs) are the preferred way for Local Authorities to 'hardwire community engagement into their own structures'[41] through LGR.

Led by ward councillors, NACs are seen as maximising the structural efficiencies brought about by LGR and strengthening localism and community participation across all areas.

Our approach takes advantage of this opportunity to realise these benefits in ways that meet our distinctive Kent context.

This approach has been the prevailing view amongst Kent Leaders and officers during recent engagement with stakeholders

Kent's NACs will be a central hub for local partnership working, connecting residents and communities with services and their council.

Each NAC will identify its initial priorities, which may be specific local issues with significant opportunity to flex new powers and responsibilities around new solutions.

Over time, we anticipate NACs will gravitate towards more strategic arrangements between partners across their areas of responsibility.

NACs will be able to take on different levels of responsibility and decision-making in response to the size and ambition of their area.

Some may begin as largely advisory and consultative, acting as an effective platform to communicate local perspectives to strategic forums in the new unitary authority and other statutory partners.

[41] MHCLG, 'Local government reorganisation: summary of feedback on interim plans', available online at: https://www.gov.uk/government/publications/local-government-reorganisation-summary-of-feedback-on-interim-plans/local-government-reorganisation-summary-of-feedback-on-interim-plans

Others may request and receive devolved responsibility and budget from their unitary authority.

We want to see NACs tending towards taking on more devolved responsibilities as they develop more mature local ways of working.

Membership of NACs

Elected unitary authority councillors will be the anchors of their NAC, ensuring that democratic accountability is central to local collaboration and delivery, and while making listening, understanding, and advocacy integral to their role.

As well as unitary councillors, NACs will include representation from town and parish councils where applicable and statutory services such as police, health, children's and family services.

Residents' associations and business groups will be encouraged to attend, as will Voluntary, Community and Social Enterprise (VCSE) organisations, to ensure local perspectives and needs are well represented.

Precise membership of each NAC will vary depending on the needs and context of that community but all should enable participation by individual members of the public.

Scale and local adaptations

Kent's NACs need to be effective neighbourhood structures.

As such, they need to cover a small enough population for a clear local identity to apply.

NACs in cities are likely to cover a larger population than those in villages, for example.

We will work with stakeholders to identify NAC boundaries and these will be informed by other neighbourhood-level footprints such as primary care networks which cover 30,000 to 50,000 residents.

These areas will cover substantially smaller geographies than those of statutory services and the unitary authorities and NACs will need to work with statutory partners to develop and iterate effective models of engagement.

On the other hand, NACs will cover a substantially larger population than most town and parish councils.

It is recommended these work in clusters to engage with this model.

Across Kent, different community engagement models are in use.

These need to shape NAC formation so that the new NACs work 'with the grain' of local energy and trust.

Integrating NACs and town and parish councils

Town and parish councillors will be core members of well-functioning NACs.

The pivotal and established role that Kent's 317 town and parish councils play in community engagement in Kent will remain critical for any new council model.

These hyper-local councils, covering an average population of just over 5,000, are the closest tier of government to residents.

They provide an irreplaceable platform for direct interaction and feedback, and they will allow this representation to be sustained through the disruption and change of LGR.

Town and parish councils in Kent convene and facilitate face-to-face and online discussions and allow residents to ask questions, make suggestions and raise concerns in a setting that ensures their local context is respected and understood.

These forums empower communities and clearly position their unique needs and priorities within broader governmental decisions.

No other level of civic engagement can match their capacity to help smaller towns and villages retain their distinct identity.

Kent's local councils have widely varying numbers of town and parish councils (see below), due to population size and historical context.

Approximately six to 10 town or parish councils might expect to cluster into each NAC, though this will vary in accordance with local need and context.

Council area	Town and parish councils[42]
Ashford	42
Canterbury	26
Dartford	8
Dover	35
Folkestone and Hythe	29
Gravesham	5
Maidstone	40
Medway	11
Sevenoaks	31
Swale	37
Thanet	10
Tonbridge and Malling	27
Tunbridge Wells	16
Total	**317**

Creating the conditions for community empowerment

NACs can be a powerful structure to drive community and neighbourhood empowerment in Kent, but success depends on three key conditions for success:

1) inclusive community engagement
2) being rooted in communities and existing structures
3) the ability to drive strategic impact

[42] Borough, District, and Unitary Authority websites

Conditions for success	How this can be achieved in Kent
1. Inclusive community engagement	• **Embed openness, inclusion, and co-production** as foundational operational principles. Where communities feel 'done to' they vote with their feet, causing meaningful initiatives to wither on the vine. NACs' membership structures and role provide a context for genuine inclusion and co-production. NAC chairs and councillors must visibly and consistently model these values or participation from day one or participation risks quickly reverting to previous levels. This includes allowing NACs to form on different timelines depending on local appetite and capacity. • **Resource communities to shape their NAC's scope and priorities**: Having the authority and resources to make a difference is at the heart of localism. Clear, permissive frameworks will support NACs to use their knowledge to define and tackle the subjects that matter to them.. NACs will be encouraged and supported, with the potential for seed funding and officer support where appropriate, to explore co-production and participatory models in the design and commissioning of services. • **Poor transport links and digital isolation may hamper participation in rural or deprived communities**. And some places will have less past experience of collective action and deliberation. NACs will need support to work through these questions. • **Confusion or cynicism borne of past restructures may demotivate communities** and prevent engagement. NACs and councils must be transparent about the rationale and roadmap for change and demonstrate with actions that NACs represent a real opportunity to make a difference.

2. Drive strategic impact	• Unitary authorities will need a **sustained commitment to gather and listen to NAC feedback** when developing strategies. The new councils will need structures and practices that embed listening and learning from NACs which should become advisory partners in policy formation.
	• NACs will need to be supported and empowered in ways that acknowledge historic inequalities.
	    o Given Kent's diversity, some NACs will need participation and resourcing mechanisms that take account of differences in civic capacity and social infrastructure, including additional capacity-building support.
	    o Unitary authorities will need to be willing to listen closely to quieter voices from less well-resourced communities.

3. Rooted in communities and existing groups	• Accessible, skilled, and informed unitary and town/parish councillors
	    o NACs will need **councillors who are skilled at local convening, mediating, and building coalitions for action**, sometimes in new ways. To support this, future councils will invest in updated councillor development programmes that include community leadership and co-production methods.
	    o **Councillors will need access to local intelligence and data**, ensuring they can respond with insight and evidence to residents' concerns.

	◦ **Councillor remuneration and practical support** will need to be reviewed where new expectations on councillors' time exceed current commitments. • A sustainable ecosystem of Voluntary, Community and Social Enterprise (VCSE) organisations ◦ **Strong and resilient VCSE partners are essential** for translating local priorities into tangible outcomes. Kent's small and medium size VCSEs, which will be vital delivery partners, sources of local insight and anchors of community trust within thriving NACs, are collectively experiencing significant financial strain with more closing than opening in recent years[43]. ◦ Unitary authorities will **build on existing work to strengthen local VCSEs**, and NACs will have an important role to play in amplifying VCSE insights and supporting the commissioning of smaller organisations. • Boundaries that promote local engagement and strategic influence • Unitary authorities will need to **develop boundaries that balance competing requirements** in order to unite meaningful communities with shared concerns, and to be coterminous with statutory and other partner geographies (for example, GPs and primary care networks) to support partner participation and dialogue. Community Governance Reviews going on across the region should also be considered in this process.

[43] KCC, Headline analysis of the voluntary and community sector in Kent, available online at: https://www.kent.gov.uk/__data/assets/pdf_file/0005/61718/Kent-voluntary-sector.pdf

Section 6: Implementation plan

This section includes:

Phased approach to implementation (preparation, transition, transformation)

Programme governance and workstreams

Summary risks and mitigations

Phased approach to implementation (preparation, transition, transformation)

Joint implementation planning across Kent

We are operating a shared programme across all Kent authorities including a Steering Group, Programme Board and have a mature programme team with shared funding operating across all councils.

We have a long history of working across councils which is a very strong foundation to start our LGR journey from.

We bring significant momentum, shared understanding and common purpose that we will maintain into the future phases of the work.

We have worked extensively with colleagues from previous LGR programmes to discuss their approach and lessons that we can take into our implementation approach for Kent.

Our approach is guided by prudence regarding the scale and complexity of Kent but also ambition regarding public service reform and the role that an effective and efficient reorganisation can play in it.

Our approach is designed to implement reorganisation alongside devolution and the establishment of a Strategic Authority across Kent (see Criteria 5 for more detail).

There are significant synergies from operating a combined devolution and LGR programme where they can be done in parallel.

Implementation principles for LGR in Kent

We have established principles to guide our approach to implementation and to ensure it is aligned with our wider public service reform ambitions. We will:

1) maintain and enhance our collaborative approach
2) ensure LGR decisions enable the bigger picture of devolution and public service reform
3) plan ahead and communicate
4) engage and co-create with partners and residents
5) support staff and partners on the journey
6) minimise disruption to staff and residents
7) establish governance to ensure delivery
8) transparent decision-making
9) be ambitious in what we can achieve beyond safe and legal
10) Keep provision of services to residents at the forefront of decision-making

The phases of LGR

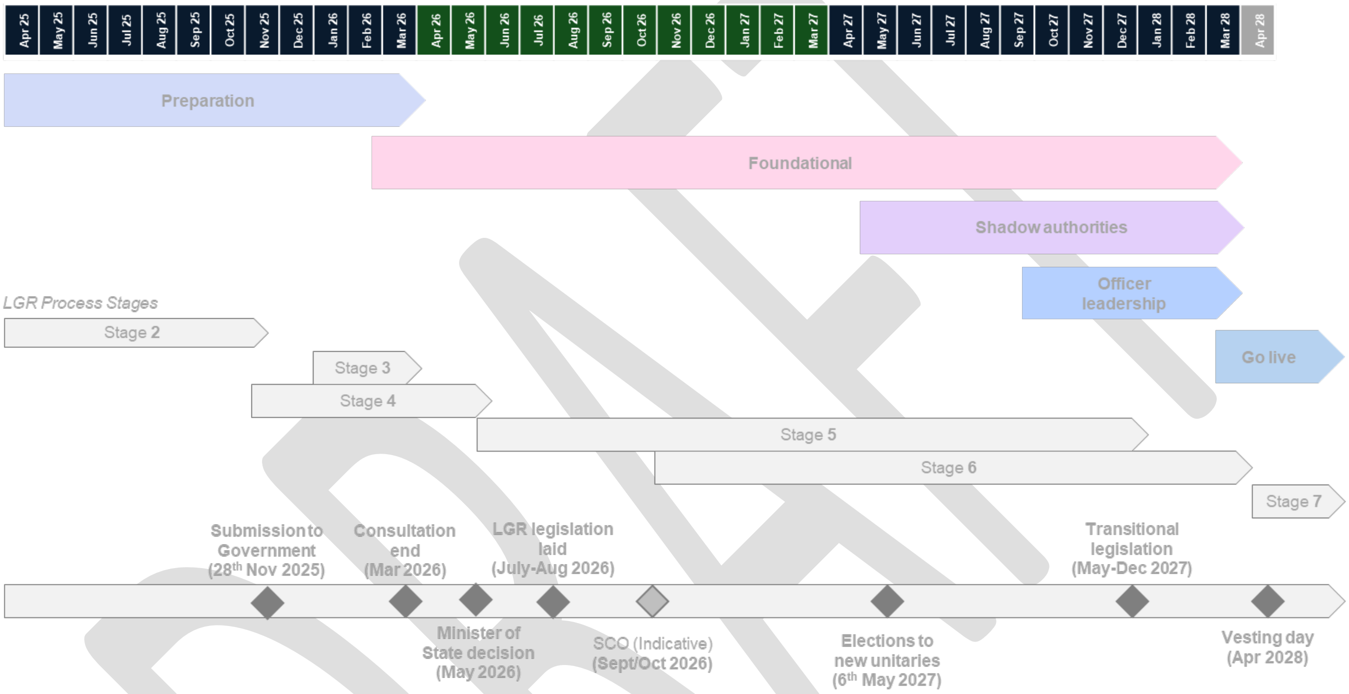
We understand the distinct phases that an LGR programme requires, the relative governance, priorities and resourcing required to make them a success.

Through working with colleagues who have delivered LGR and MHCLG officials we have developed a timeline for reorganisation which maps our phases onto the stages outlined by MHCLG.

We have transitioned our programme approach from development of this proposal into establishing the programme management that we will require through the preparation phase.

The plan and our advance preparation will enable us to deliver efficiently and continue engagement and consistent communication with partners and staff.

This will maintain the resilience of local government and maximise the benefits of reorganisation in Kent throughout the process.



1. **Preparation** Before a decision on the shape of the new councils. We have started work on implementation early to set it up for success. We have a plan for Day One and are ambitious to deliver strong, cohesive councils to deliver transformation and public service reform beyond safe and legal transition. We will appreciate a timely ministerial decision to enable us to move beyond this phase.

2. **Foundational** When a decision on the shape of the new councils has been made, initially before the election of shadow members or appointment of officer leadership.

3. **Shadow authorities** With members elected but only with programme or unofficial groupings of officers for capacity.

4. **Officer leadership** When statutory and senior officers have been appointed and can prepare the new councils working with the appointed councillors.

5. **Go-live** After vesting day when the councils deliver services.

There are fundamentals that will remain in place throughout the reorganisation process:

- staff support and communication
- communication with partners and residents
- access to the right skills and capacity
- clarity on Day 1 requirements and target state
- management of programme creep and over-optimism
- change management
- collaboration and ownership

In addition, these are the summary priorities by phase:

Phase	Summary priorities
Preparation	• Collaborative service working – identifying opportunities, risks and shared understanding • Set up the programme (governance, workstreams and finance) • Recruit Strategic Partner(s) • Agree target position for Day One and scenario planning • Set up the plan, timeline and critical path including provisional Day One requirements and milestones • Set up a data hub - gather and maintain consistent programme data • Define and agree scope of LGR-related decisions with sovereign councils
Foundational	• Adapting programme to specific milestones • Commencing Day One programme plan (what is in appropriate scope of the programme e.g. ICT infrastructure, treatment of systems and contracts) • Service alignment and transformation including reconfiguring existing area based working arrangements to match boundaries of new councils • Options appraisals and preparing for key decisions • Elections • Compliance with Structural Changes Order and legal checks and assurance • Project plan for safely winding down sovereign authorities
Shadow authorities	• Continuing delivery of Day One programme plan • Appointing Chief Executives and statutory and leadership roles • Member inductions and service briefings • Key decision timetable • TUPE transfer arrangements
Officer leadership	• Tier 2 and Tier 3 Leadership Recruitment • Service planning • Development of council plan, budget MTFP • Key policies and strategies (strategic priorities and corporate plans, unitary strategic risk register, constitution) • Operating model and staffing allocations

	• Preparing for Day One and alignment with Day One vision and change (particularly for vulnerable people and those reliant on services for health and wellbeing).
Go-live	• Stability and seamless experience • Improvement and post-LGR transformation planning

Programme governance and workstreams

We will operate an LGR Programme Board across Kent and Medway which will report to the existing Leaders group, though acknowledging it does not have decision-making powers, and in due course into Joint Committees.

This Board will include the Chief Executives and Programme Director and will oversee the programme and address strategic issues and risks.

We will establish a Day One Board to focus on managing delivery of the programme plan following the ministerial decision.

This will include tracking progress against milestones and completion of Day One requirements.

We have set up workstreams with Chief Executive sponsors and agreed engagement principles regarding representation from authorities as service leads and on workstreams.

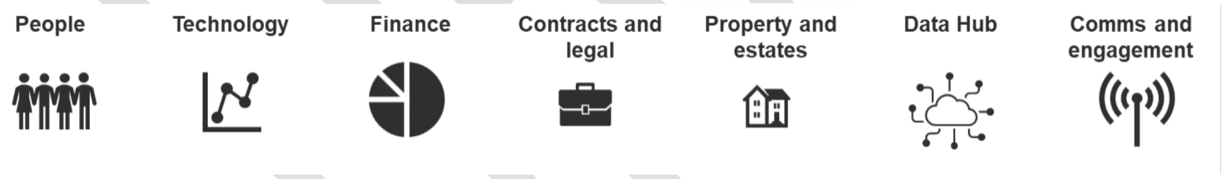
We will set up unitary delivery groups to focus on issues specific to each new council including elections, council plan, member induction, policies and culture.

These groups will increase in importance when working to shadow authorities and when interim heads of paid service are appointed but by starting early, we are setting the councils up for success.

Our workstreams

We know the importance of operating a single programme across Kent to drive consistency, efficiency and to address challenges where possible.

Our workstreams will cover services and the following key themes:



We will establish Unitary Delivery Groups to focus on preparations for the new councils.

These are collaborative by definition and will be agile to take advantage of opportunities that may arise but relate to one of the new councils individually.

These workstreams will evolve and governance structures will develop to support the Shadow Authorities and establish the new authorities when permanent officers are appointed.

Stakeholder engagement

We know we need to work closely with partners, staff and residents to avoid LGR having negative impacts on the quality or resilience of services in Kent.

We know we need to communicate early, clearly and transparently with partners and provide opportunities for co-creation and innovation to improve how we work and set the right foundations for public service reform.

We are liaising with stakeholders and are developing an engagement plan to ensure proactive, timely and constructive conversation with stakeholders.

Our ambition for Day One

To deliver a seamless transition from the perspective of our residents where those who rely on public services for their health or wellbeing continue to be protected.

We will lay the foundations for improved collaboration across the public sector and harnessing the benefits of transformation.

Our progress on implementation

From our experience of reorganisation, we know the value of starting early.

We have a head start as we already work closely together and have a number of shared services, roles and contracts aligned with the new unitary structures.

To build upon this we are working collaboratively to:

- map our ICT infrastructure and enterprise architecture
- set up unitary delivery groups to identify and take advantage of naturally occurring opportunities such as shared roles or where contracts or licenses are expiring
- map our contracts to inform integration opportunities
- bring our service leads together to compare policies and processes and to identify opportunities
- clean up and standardise data across Kent
- establish a Project Management Office
- identify skills and capacity requirements to deliver the programme
- consider further shared roles and skills sharing across councils
- develop a datahub to drive forward the LGR process
- agree how sovereign councils in Kent will operate prior to vesting day
- maintain and transition our LGR programme Board and tools to power the programme
- stakeholder and resident engagement and a significant communications programme

Summary risks and mitigations

We understand the risks LGR presents and are already working to mitigate them through our programme structure and approach:

- **Disaggregation** – we understand the challenge and risk of disaggregating key services and that this will take up significant programme capacity. We are planning early regarding Day One requirements and supporting services with significant capacity from workstreams to enable them to focus on their specific requirements.
- **Aggregation** – aggregating services requires alignment of policies, processes and systems in addition to fundamentals like organisational culture and ICT infrastructure. These can take time but are critical to achieving the benefits of local government reorganisation.
- **ICT capacity** – ICT is a key service, workstream and enabler of all services and elements of the programme and is a risk to the safe and legal function of the new councils.
- **Collaboration** – LGR requires collaboration across councils, tiers of local government, across political parties and with partners. We are mitigating this through:
    - Building on existing close working arrangements;
    - Developing ‘no regrets activities’ – a set of actions and decisions that we can deliver across Kent that will benefit the programme regardless of future decision;
    - Discussing protocols for how we will approach LGR.

We know the value of ‘good endings and safe beginnings’ and will setup the programme efficiently to maintain focus on service delivery in sovereign councils while setting up the future councils for success.

Appendix 1: Options appraisal

This section includes:

Options appraisal process

Options appraisal results

Options appraisal process

This appendix outlines the approach taken to appraise potential unitary options for Kent by the 14 local authorities. The appraisal was designed to ensure a robust, consistent and evidence-based assessment to support local decision-making on which options should progress to full business case development.

The options appraisal approach was rooted in government guidance, with alignment to the six local government reorganisation (LGR) criteria set out in the Secretary of State's letter dated 6th February 2025 and further clarified in June 2025.

The appraisal did not produce a ranked list of options or identify a preferred option.

Councils drew on the shared evidence base, alongside resident and stakeholder views, to inform their conclusions.

Overview of the approach

The appraisal process followed five key stages:

Step 1: Selection of options for appraisal

The process began with the development of a longlist of 10 potential unitary options.

This longlist was informed by previous work carried out by local authorities, submissions to central government and extensive input from stakeholders, including council officers and Leaders.

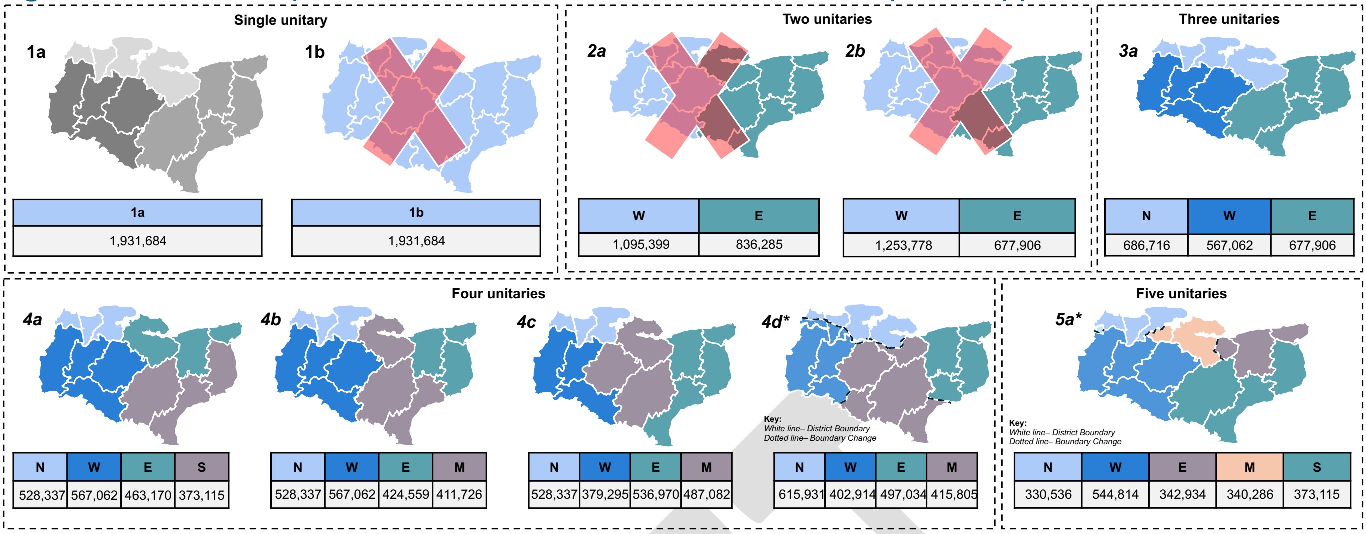
These options encompassed all permutations raised in prior discussions, including suggestions made during initial interviews and strategic workshops.

Following this initial development, a series of engagement sessions were held with Leaders from all 14 authorities.

Through these discussions, three options were jointly agreed to be out of scope for full appraisal, resulting in a refined shortlist of seven options to be taken forward for comprehensive evaluation.

This agreement marked a critical stage in the process, reinforcing the joint ownership of the appraisal exercise.

Figure X: *Potential options that were raised at the start of the options appraisal*



**To match the current total population of 1,931,684, we applied a proportional multiplier to the original figures for options with boundary changes. This preserves the relative population distribution across the four areas while ensuring the total aligns with up -to-date data.*

Step 2: Data collection and modelling

To assess each option, a comprehensive dataset was compiled using both publicly-available data sources and specific submissions from individual councils.

This ensured that the appraisal drew from a consistent and authoritative evidence base. Data was initially collected for each existing local authority and then aggregated or modelled to create a coherent picture of each potential new unitary configuration.

For options that involved redrawing boundaries, most notably options 4D and 5A, additional modelling was required.

This included the use of Lower Super Output Area (LSOA)-level population estimates to produce reliable approximations of how existing data would translate to proposed future geographies.

Where appropriate, other datasets not available at LSOA level, were looked at on a pro-rata basis and were based on population estimates to align with the proposed unitary boundaries.

The methodology applied population-weighted approaches and, where possible, consistent assumptions across datasets.

This modelling ensured the integrity and comparability of data across all options.

Figure 18: Example metrics

Example metrics gathered across all current authorities

Metric	Medway (unitary)	District councils												Kent County Council	Total / Average
		Ashford	Canterbury	Dartford	Dover	Folkestone and Hythe	Gravesham	Maidstone	Sevenoaks	Swale	Thanet	Tonbridge and Malling	Tunbridge Wells		
Population (mid-2024)	292,655	140,936	162,100	125,011	119,768	112,411	110,671	187,767	122,748	158,379	142,691	136,853	119,694	1,639,029	1,931,684
Geographic area (sq km) (2024)	194	581	309	73	315	357	99	393	370	373	104	240	331	3,545	3,739
Population density (people per sq km) (2024)	1,509	243	525	1,712	380	315	1,118	478	332	425	1,372	570	362	462	517
Total GVA (£m) (2023)	7,657	3,939	4,352	4,343	3,277	2,802	2,206	5,550	5,098	3,633	2,588	5,406	4,114	47,308	54,965
GVA per capita (£) (2023)	26,164	27,949	26,848	34,741	27,361	24,926	19,933	29,558	41,532	22,939	18,137	39,502	34,371	28,863	28,454

Metrics consolidated by potential future unitary authority for options in scope

Metric	Option 1A	Option 3A (example)			Option 4A (example)				Option 5A (example)				
		N	W	E	N	W	E	S	N	W	E	M	S
Population (mid-2024)	1,931,684	686,716	567,062	677,906	528,337	567,062	463,170	373,115	330,536	544,814	342,934	340,286	373,115
Geographic area (sq km) (2024)	3,739	739	1,334	1,666	366	1,334	786	1,253	287	1,267	503	429	1,253
Population density (people per sq km) (2024)	517	929	425	407	1,444	425	589	298	1,151	430	682	793	298
Total GVA (£m) (2023)	54,965	17,839	20,168	16,958	14,206	20,168	10,573	10,018	9,373	19,244	7,815	8,515	10,018
GVA per capita (£) (2023)	28,454	25,977	35,566	25,015	26,888	35,566	22,827	26,850	28,356	35,322	22,788	25,024	26,850

Step 3: Development of evaluation criteria and definition of 'what good looks like'

The appraisal was structured around fourteen evaluation criteria, developed directly in reference to the government's six tests for LGR, as outlined in its correspondence dated 6 February 2025 and subsequent guidance issued in June 2025.

These criteria reflect key considerations such as efficiency, local identity, capacity to deliver sustainable services and readiness for devolution.

For each of the 14 evaluation criteria, a set of specific metrics was identified to enable detailed assessment.

Alongside each metric, a definition of 'what good looks like' was agreed to provide a consistent standard against which all options were evaluated.

While some elements of government guidance were treated as threshold requirements, e.g. minimum standards for all options, others were differentiating factors and thus formed part of the comparative framework.

Figure 19: Evaluation criteria and definition of 'what good looks like'

Evaluation criteria defined to structure options analysis

Headline Government Criteria	Evaluation criteria based on Government guidance
1. Establishing a single tier of local government	1.1 Sensible economic areas with an appropriate tax base
	1.2 Sensible geography to increase housing supply and meet local needs
	1.3 Single tier governance structures
2. Efficiency, capacity and withstanding shocks	2.1 Appropriate population size
	2.2 Efficiencies to improve council finances and taxpayer value for money
	2.3 Transition costs and transformation opportunities
	2.4 Putting local government finances on a firmer financial footing
3. High quality and sustainable public services	3.1 Improving service delivery and avoiding unnecessary service fragmentation
	3.2 Public service reform and better value for money
	3.3 Impact on crucial services such as social care, children's services, SEND and homelessness
4. Working together to understand and meet local needs	4.1 Local identity, culture and historical importance
	4.2 Views expressed through local engagement, and ability to address any concerns
5. Supporting devolution arrangements	5.1 Sensible population ratios between local authorities and any strategic authority
6. Stronger community engagement and neighbourhood empowerment	6.1 Enabling strong community engagement

Example of metrics to be assessed

1.1: Sensible economic areas with an appropriate tax base	
Metrics/factors	**What does good look like?**
Gross Value Added (GVA) per capita (2023) (£)	Balanced GVA per capita between unitaries, suggesting balanced levels of productivity and positive implications for the distribution of economic prosperity among residents
Total Gross Value Added (GVA) (2023) (£m)	Each unitary has a sufficient GVA to generate tax and there is balance between unitaries, meaning good long-term prospects for all future authorities
Council tax base (number of properties at Band D equivalent)	All authorities with a sufficient number and profile of properties to provide a council tax base which can sustainably support services, with a reasonable balance between authorities
Council Tax harmonisation / difference in Band D rates	District areas within a unitary have low to no difference between council tax rates. The least difference between councils within a unitary would provide minimal administrative and resident disruption in harmonising rates
Alignment to major Kent industries	Unitaries demonstrate alignment to one or more of the key industries

Step 4: Assessment parameters and scoring methodology

Each metric was assessed using a standard three-point scale: high, medium or low.

For most metrics, this scoring was determined through statistical balance analysis i.e. evaluating the degree of variation in outcomes across the proposed unitary authorities under each option.

The underlying principle was that a more balanced distribution of characteristics-, e.g. population size, financial resilience, service demand- across new authorities would indicate greater equity and resilience.

The scoring process followed a clear sequence:

1. Identify the range of values between councils under each option for each metric.
2. Determine percentile thresholds for categorising those ranges:
    - High = below 33rd percentile (most balanced)
    - Medium = 33rd to 66th percentile
    - Low = above 66th percentile (least balanced)
3. Assign scores for each option accordingly.

In cases where balance was not a relevant concept, i.e. for county-wide service considerations or unique single-unitary configurations such as Option 1A, bespoke scoring definitions were applied.

Additionally, to allow for further nuance in interpretation, intermediate scores such as Medium/High or Medium/Low were used where appropriate.

No weighting was applied to either the criteria or the metrics. Each was treated as equally important for the purposes of the appraisal.

The model is explicitly comparative: the scores for each option reflect how they perform relative to others in the shortlist, rather than against an absolute benchmark.

Step 5: Assessment and presentation of results

Each option was scored against every metric, producing an average score for each of the 14 evaluation criteria.

The results were presented via a visual dashboards, supplemented with detailed narrative and commentary to contextualise the findings and highlight key trade-offs or assumptions.

In some cases, particularly for Option 1A, which envisages a single county-wide unitary authority, additional analysis was undertaken to ensure comparability, given that balance metrics were not applicable in the same way as for multi-unitary options.

Options appraisal results

All 14 councils worked together to complete an options appraisal prior to business case development. Following joint analysis, review and discussion, the options being put forward are those that Leaders believe are both workable and offer the best value for Kent.

Following the completion of the appraisal, Council Leaders convened to review the evidence presented.

During this meeting, they collectively identified preferred options to proceed to business case development.

This decision was informed both by the technical appraisal and by the views of their individual councils and local residents.

While the options appraisal itself did not rank or recommend a preferred outcome, it provided the objective foundation upon which political judgements and democratic input could be made.

Figure 20: *Summary assessment by evaluation criteria*

Headline Government Criteria	Evaluation criteria based on Government guidance	Summary assessment by option						
		1A*	3A	4A	4B	4C	4D	5A
1. Establishing a single tier of local government	1.1 Sensible economic areas with an appropriate tax base	M	H	M/L	M	M/H	M	M/L
	1.2 Sensible geography to increase housing supply and meet local needs	M	H	M	M	L	M	M
	1.3 Single tier local government structures	L	L	M	M	M	H	M
2. Efficiency, capacity and withstanding shocks	2.1 Appropriate population size	M	H	M	H	M	L	L
	2.2 Efficiencies to improve council finances and taxpayer value for money	H	H	M/L	M/L	M/L	M/L	L
	2.3 Transition costs and transformation opportunities	H	H	M	M	M	M/L	L
	2.4 Putting local government finances on a firmer financial footing	H	M	M/L	M/H	M/H	M/L	M
3. High quality and sustainable public services	3.1 Improving service delivery and avoiding unnecessary service fragmentation	M	H	M	M/H	M/L	M/L	M/L
	3.2 Public service reform and better value for money	M	M	M	M	M/L	M/L	M
	3.3 Impact on crucial services such as social care, children's services, SEND and homelessness	M	M	M/H	M	L	L	M
4. Working together to understand and meet local needs	4.1 Issues of local identity and cultural and historic importance	M/L	M	M	M	M	M	M
	4.2 Views expressed through local engagement, and ability to address any concerns	-	-	-	-	-	-	-
5. Supporting devolution arrangements	5.1 Sensible population ratios between local authorities and any strategic authority	L	H	H	H	H	M	M
6. Stronger community engagement and neighbourhood empowerment	6.1 Enabling strong community engagement	L	M	L	H	M	H	L

**Option 1a appraised separately due to it proposing a single unitary and an innovative model of local government which is not suited to the appraisal methodology.*

<u>Notes:</u>

- Each evaluation criterion was scored as High, Medium, or Low, based on an average score derived from multiple metrics.
- For most metrics assessed, the process evaluated how well each option achieves balance across all proposed unitary authorities.
- The model is comparative, assessing how each option performs relative to other options assessed, rather than determining if an option is objectively good or bad.
- Minor differences between options still resulted in at least one option scoring High and one Low, due to the comparative nature of the model.

Appendix 2: Financial modelling

This section includes:

Financial context

Purpose and scope of LGR financial modelling

Methodology and structure of the LGR financial model

Financial modelling summary outputs

Implementation costs

Reorganisation savings

Disaggregation costs

Phasing and payback period

Financial context

Councils across Kent are under pressure from rising costs and demand. LGR can help to address these challenges, but in itself will not address the scale of the financial challenge.

National financial context

The local government sector faces a major financial challenge with an estimated £4 billion funding gap over the next two years.

Demand for critical services is increasing because of population growth and ageing populations.

Councils are also facing rising costs, with adult social care costs estimated to have increased by 9% and children's social care costs by 18% in real terms over the past five years.

There continues to be uncertainty over long term funding arrangements, which have placed many councils in increasingly fragile financial positions. The growing number of Section 114 notices in recent years highlights the systemic strain across the sector, with pressures in Social Care, Housing and Temporary Accommodation, and Dedicated Schools Grant (DSG) deficits now common drivers of instability.

At the same time, the absence of clarity on the Fair Funding Review, ongoing uncertainty over business rates reform and reset, and the limited scope of multi-year settlements have constrained council's ability to plan sustainably. Against this backdrop, LGR offers an opportunity to strengthen financial resilience through streamlined structures, integrated service delivery, and more sustainable use of resources over the long term.

The Kent financial context

Combined net revenue expenditure across the 14 Kent councils is £2,337m, with 73% in Kent County Council and 15% within Medway - the authorities delivering statutory adult social care and children's services.

Across Kent, councils are facing sustained financial pressures.

Rising demand in adult social care, children's services and SEND, alongside inflationary cost pressures and debt, are placing significant strain on budgets.

The current two-tier system contributes to inefficiencies through duplication in democratic arrangements and overlaps in service delivery.

Reserves and funding the reorganisation

Across all Kent councils combined there are forecast Total Usable Reserves of **£959m by 2028/29.**

Further discussions will be needed to decide the basis for allocation of county reserves across the future councils post reorganisation.

It will be the decision of each new council to determine how to use its resources to fund the cost of reorganisation, which is likely to be through a mixture of use of reserves and capital receipts.

Debt across Kent councils

Total external debt across Kent stands at £1,730m. Due to the provision of upper tier services, 26% of borrowing stands in Medway and 41% in the County Council. Three districts, (Dartford, Tonbridge and Malling and Tunbridge Wells) report no general fund borrowing.

Gross budget gap of existing councils

The forecast total gross budget gap for all 14 councils by 2028/29 of **£138.3m**, has therefore not been included within the breakeven analysis.

However, there is recognition that if there were any budget gaps post vesting day, the recurring savings projected from our proposal could contribute to closing any future gross budget gaps across the new authorities.

The financial modelling does not take direct account of existing council budget gaps, which will need to be managed regardless of LGR.

Impact of Fair Funding 2.0 on Gross Budget Gap

The Fair Funding Review is ongoing nationally. While considered by all councils across Kent, the complexity and uncertainty of the review mean it has not been modelled in detail.

There is recognition that Fair Funding 2.0 is likely to have an impact on councils' financial positions.

There are distinct additional needs in the county related to deprivation which are expected to benefit with the Fair Funding formula but no assumptions have been made within the gross budget gap assumptions above as it is not possible to quantify at this stage.

Dedicated Schools Grants

The financial analysis assumes that all existing councils will manage their Dedicated Schools Grants (DSG) positions regardless of LGR, therefore DSG surplus or deficits (if any) have not been included within the breakeven analysis.

It will be the decision of each new authority to determine how to use its resources to fund the cost of reorganisation against any funding pressures observed from DSG.

The combined DSG deficit position as at 31 March 2025 was £150.1m (Medway Council had a £16.4m deficit and Kent County Council had a deficit balance of £133.7m).

Kent County Council entered the Department for Education's "Safety Valve" process in Summer 2022, which involves the local authority reforming its high needs systems and associated spending in return for additional funding to contribute to the historic deficit.

Deficits on the DSG is a national problem affecting county and unitary authorities.

At the present time these are being managed through a statutory override which enables a technical adjustment in the statutory statement of accounts to hold these deficits without recognising the impact against General Fund resources.

A consultation is expected by the government in 2026/27 on reforms to SEND, the root causes of deficits and to invite proposals for a resolution.

Members of the Shadow Authorities for the proposed unitary authorities will need to carefully consider proposed reforms in light of their local circumstances.

Purpose and scope of LGR financial modelling

Financial modelling is a key component of the LGR proposal. Its purpose is to evaluate the financial implications of local government reorganisation across Kent in a consistent way across all LGR options.

The LGR options in scope for financial modelling

A single approach to estimating financial impact of LGR was taken across four options for LGR:

Three unitaries (3A)

Four unitaries (4B)

Four unitaries (4D)*

Five unitaries (5A)*

Purpose of financial model

The financial modelling aims to:

- estimate the financial impact of the evaluated reorganisation options
- compare options on a like-for-like basis, considering savings costs, and payback

Limitations of scope to date

Whilst being fully supportive of the long-term benefits of LGR, all Kent finance officers agree that LGR does not in itself provide the solution to the scale of the financial challenge faced.

The model does not consider the impact of local government Fair Funding review and the Business Rate reset.

The Kent Finance Officer Group (KFOG) have collectively agreed on the following position on the analysis carried out:

- LGR, while generally expected to be positive for local government finances in the long term, will not solve the cost, demand and associated funding challenges currently being faced. The scope of the financial modelling considers purely the impact of reorganisation, all other things being equal.
- The work carried out at this stage is not a full bottom-up exercise of the financial impact of LGR. Assumptions are based on the past LGR business cases produced to support other areas which have been through the LGR submission process in recent years.
- Due to the size and number of councils in Kent, there is not a fully comparable example of a recent programme to confidently benchmark against. Due to the level of complexity, payback periods in Kent may therefore be longer than some other reorganisations.
- The speed of delivery and level of savings post vesting day of the new councils will largely be determined by decisions already made by the predecessor authorities and those taken by the new authorities. These include decisions in relation to contractual obligations, borrowing, transformation and wider public service reform.
- A range has been applied specifically 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 financial modelling does not take account of how transition costs will be funded.

- The assumptions in the model have not been tested against actual outturn data for any of the previous local government reorganisation programmes.
- Given the context above, the modelling should not be seen as a set of targets that new authorities may be held to account for, as setting the post-vesting day budget will be the responsibility of the new authorities.

Methodology and structure of the LGR financial model

All finance officers across the 14 Kent councils have reviewed and adjusted financial modelling in order to provide a single financial assessment of models for inclusion in proposals to Government.

Baselining

1. **Standardised data requests** were completed by all 14 councils, covering revenue budgets, reserves, capital plans, balance sheets and key service metrics. Alongside numerical data, contextual narrative was gathered to support understanding of pressures, risks, and transformation plans.
2. **A consolidated financial baseline** was created, using data returns to combine district, unitary and county budgets into unified figures based on agreed assumptions.
3. Baseline information was then used to create a **financial view of all proposed councils** under each of the five options being submitted to government.

Three elements of the financial modelling

The financial model is made up of three calculators, which have been applied to all options:

1. Implementation costs	2. Reorganisation savings	3. Disaggregation costs
Estimates the one-off transition costs associated with moving to a new unitary model.	Estimates the annual high-level savings potential from efficiencies that can be unlocked through reorganisation (e.g. workforce, governance, systems).	Estimates the additional recurring expenditure that results from dividing upper tier (i.e. county level) services into multiple new upper tier authorities.

Assumptions within the model have been collectively reviewed and adjustments made to factor in Kent-specific context or any specific characteristics of proposed models.

Payback period
The savings and costs calculated for each option have been phased to show payback period for each option.

Financial calculations are underpinned by benchmarking of previous LGR proposals and the estimated costs and benefits modelled in those reports, adjusted for the budgets, populations and current local government structures within Kent.

Adjustments have been made to reflect experience of local government reorganisation implementation and through discussion with all Section 151 Officers across Kent.

Further detail of methodology

The calculation of each element of the model applied is explained separately within this section of the report.

Financial modelling summary outputs

The key driver of difference between options are the number of councils being proposed. Due to the assumptions applied within the modelling, implementation costs and recurring costs of disaggregation increase as the number of councils proposed increases.

Our financial modelling shows **Option 3A, a three-unitary model built on existing boundaries**, has the highest estimated savings of the options modelled, the lowest disaggregation costs and lower implementation costs, resulting in an estimated payback period of 5.4 – 6.7 years.

Table 28: *Summary of financial modelling*

Option	Implementation costs (one-off) (£m)	Reorganisation savings (gross) (£m)	Disaggregation costs (£m)*	Recurring annual revenue savings (£m)**	Estimated payback period
3A	(127.8)	69.4	(19.7) - (29.2)	40.2 - 49.7	5.4 – 6.7 years

**A range has been applied specifically for disaggregation costs following collaborative discussions around different scenarios for the impact of LGR on commissioned spend across adult and children's social care.*

***Recurring revenue savings = gross reorganisation savings less disaggregation costs*

Further analysis

The calculation of each element of the financial model is explained in the following pages.

Implementation costs

Implementation costs definition: The estimated one-off transition costs associated with moving to a new unitary model.

Method of calculation:

- Reviewed past LGR cases to estimate and benchmark an indexed average level of implementation costs per capita.
- Multiplied the benchmarked costs per capita figure by the total population of Kent to arrive at an estimated total implementation cost per unitary model.
- Applied an uplift of costs per additional unitary authority being created, due to additional costs through establishing governance structures, IT systems, administrative frameworks, etc.
- Applied specific adjustments based on the characteristics of Kent and assumptions around the models being proposed. A specific uplift of £5m was added to reflect the additional complexity and implementation effort to deliver boundary changes.

Implementation costs

Table 29: *Implementation cost summary*

Option	Implementation costs (£m)	Commentary
3A	(127.8)	Implementation complexity and costs are relatively high due to need to integrate and disaggregate to form three unitary authorities, but lower than other options modelled.

Categories of implementation cost

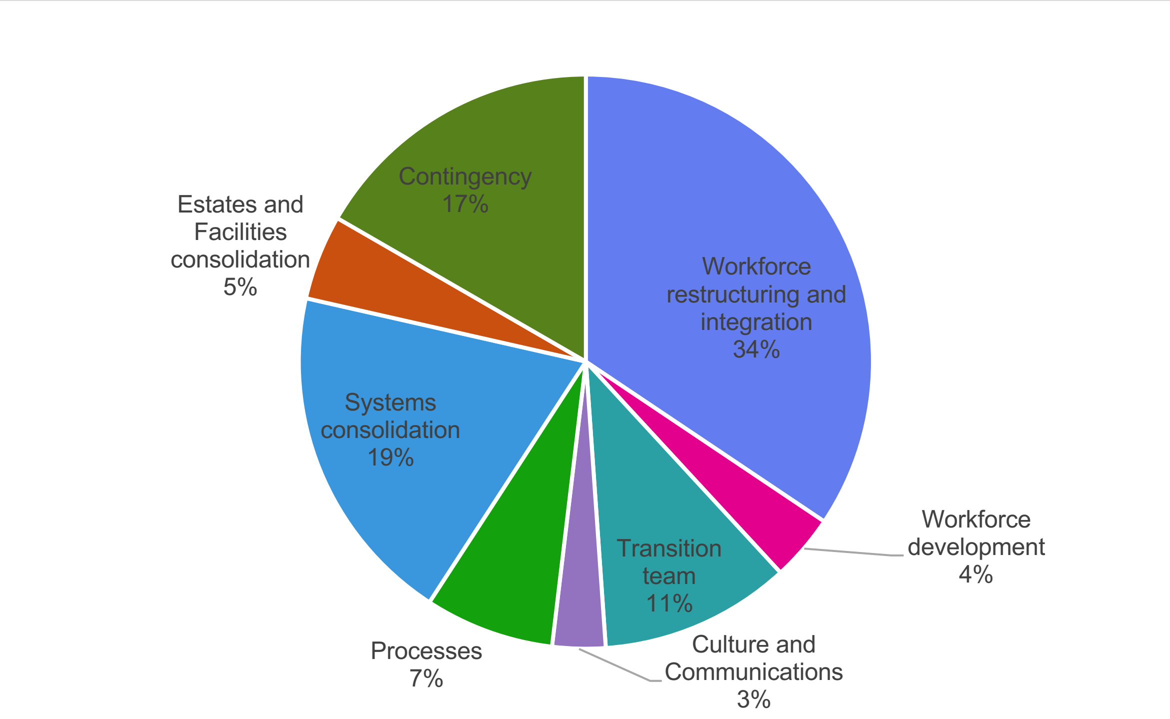
As part of implementation cost benchmarking, categories of implementation costs have been identified to provide an indication of the expected breakdown of costs, for any of the LGR options.

Table 30: *Implementation cost categories*

Implementation cost category	Description
Workforce restructuring and integration	Costs associated with delivering TUPE and salary harmonisation processes. Compensation paid to employees as a result of any redundancies and pension strain. ***Note: no decisions have been made regarding the size of the future workforce and the potential need for redundancies. A significant proportion of staff reductions could be delivered through staff naturally leaving the organisations.***
Workforce development	Additional costs to upskill and reskill employees to adapt to new roles and responsibilities.
Transition team	Transition and implementation programme teams including programme management, legal, finance, contract management, finance and other specialist support.

Culture and Communications	Costs to develop communications, branding, training, and public information in relation to new authorities.
Processes	Harmonising processes and facilitating effective service transition, including specific constitutional changes and developments, democratic transition and new policies and procedures.
Systems consolidation	Alignment of systems and digital infrastructure, including merging systems, data migration and cyber security.
Estates and Facilities consolidation	Reconfiguration of buildings, costs of disposal, and termination fees on leases.
Contingency	Additional 20% contingency to allow for prudence in estimates.

***Figure 21:** Implementation cost distribution*



Phasing of implementation costs

One-off implementation costs have been assumed to start ramping-up from the shadow year and build up by Year 4. The majority of costs are incurred in year 2 and year 3, where the most staff exit costs are expected to be incurred. The phasing of the contingency reflected the overall phasing of costs.

***Table 31:** Implementation cost summary*

Implementation cost category	Shadow Year (FY27/28)	Year 1 (FY28/29)	Year 2 (FY29/30)	Year 3 (FY30/31)	Year 4 (FY31/32)
Workforce restructuring and integration	5%	15%	20%	60%	-
Workforce development	10%	50%	40%	-	-

Transition team	25%	30%	30%	15%	-
Culture and Communications	20%	50%	30%	-	-
Processes	5%	15%	30%	30%	20%
Systems consolidation	5%	15%	30%	30%	20%
Estates and Facilities consolidation	-	5%	25%	30%	40%
Contingency	10%	25%	30%	25%	10%

Reorganisation savings

Reorganisation savings (gross) definition: The estimated annual savings from efficiencies achieved through reorganisation, moving from two tiers to one tier of local government, by removing duplication, consolidating services and operating at greater scale.

Method of calculation:

- Reviewed past LGR cases to estimate and benchmark an indexed average level of savings per capita achievable through LGR.
- Multiplied the benchmarked savings per capita figure by the total population of Kent to arrive at an estimated total saving for per unitary model.
- Applied specific adjustments based on the characteristics of Kent and assumptions around the models being proposed. This included a reduction in the total savings achievable and contingency being added to the model.
- Applied a dilution of savings for the number of unitary authorities being created, due to reduced ability to operate at scale.

Reorganisation savings

Table 32: *Reorganisation savings summary*

Option	Gross reorganisation savings (£m)	Commentary
3A	69.4	Marginally, the highest level of gross savings of the options modelled due to greater opportunity for economies of scale.

Categories of reorganisation saving

As part of benchmarking LGR revenue savings, categories of savings have been identified to provide an indication of the expected breakdown of savings.

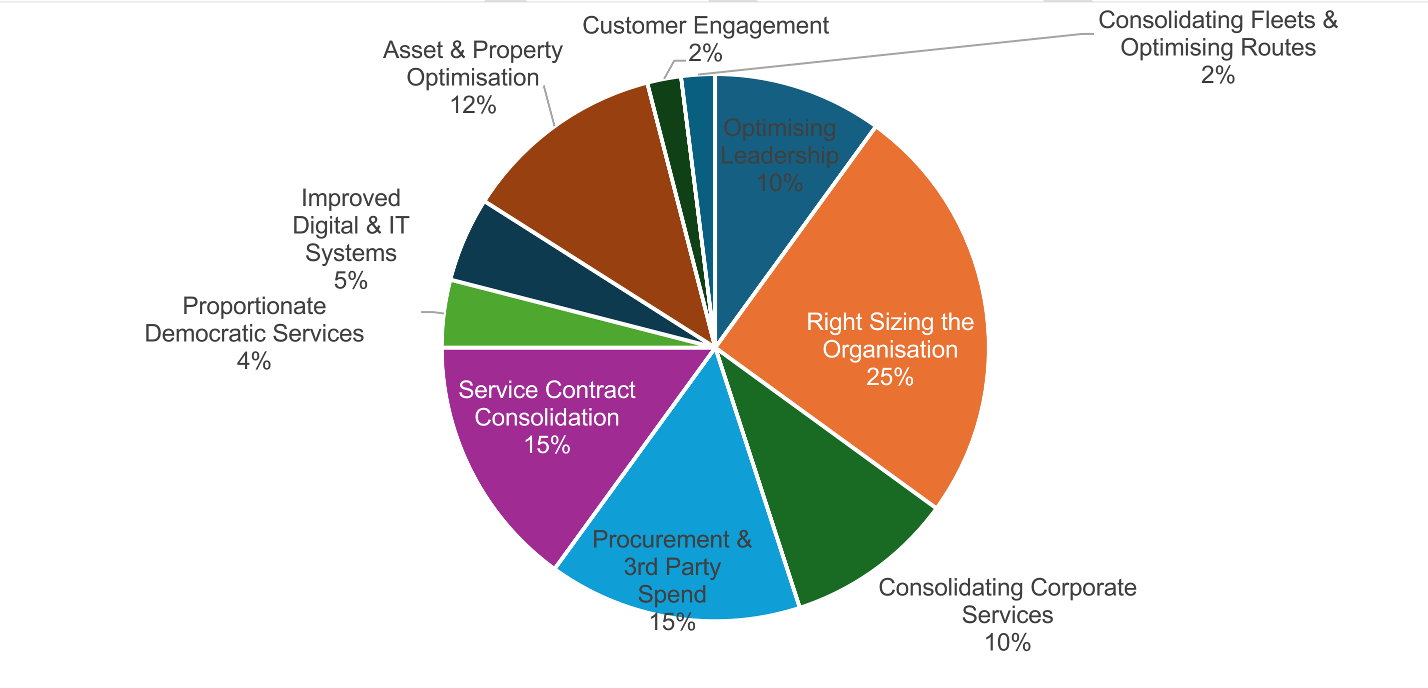
Table 33: *Savings categories*

Savings category	Description
Optimising Leadership	Reducing the number of managerial roles to eliminate duplication by merging similar responsibilities into fewer positions.
Right Sizing the Organisation	Reducing overall workforce through role consolidation and automation.
Consolidating Corporate Services	Consolidating back-office functions, such as Human Resources (HR), Finance and Information Technology (IT).
Service Contract Consolidation	Implementing new sourcing arrangements for contracts that are either currently outsourced or could be outsourced, potentially leading to financial and operational efficiency.
Procurement & 3rd Party Spend	Centralising procurement, leading to an increase in relative purchasing power and renegotiating terms with suppliers.

Democratic Services	Reducing the number of councillors and governance costs (eg committees, elections).
Improved Digital & IT Systems	Implementing unified digital platforms, automating repetitive tasks, streamlining workflows, and eliminating manual processes.
Asset & Property Optimisation	Reducing asset and property portfolio to align with council needs.
Customer Engagement	Enhancing customer contact facilities and developing a combined approach to managing customer contact centre, where appropriate including digital self-service.
Consolidating Fleets & Optimising Routes	Reducing fleet size and improving vehicle routing to lower transport costs.
Contingency	10% contingency applied to reflect risks to savings being achieved.

The exact proportion of savings may vary by option, and will be considered in greater detail in the next phase of LGR.

***Figure 22:** Reorganisation Savings distribution*



Note: a 10% contingency is also applied but has not been reflected in the graph above

Phasing of reorganisation savings

Savings are realised to their entirety by Year 6 and are then ongoing. Most savings are achieved in year 3. A 10% negative contingency has been applied to reflect risk and has been phased in line with when other savings are achieved.

***Table 34:** Savings summary*

Reorganisation savings category	Year 1 (FY28/29)	Year 2 (FY29/30)	Year 3 (FY30/31)	Year 4 (FY31/32)	Year 5 (FY32/33)
Optimising Leadership	10%	20%	40%	20%	10%

Right Sizing the Organisation	10%	20%	40%	20%	10%
Consolidating Corporate Services	10%	20%	40%	20%	10%
Procurement & 3rd Party Spend	10%	20%	30%	20%	20%
Service Contract Consolidation	10%	20%	30%	20%	20%
Democratic Services	80%	20%	-	-	-
Improved Digital & IT Systems	5%	15%	30%	25%	25%
Asset & Property Optimisation	10%	15%	25%	25%	25%
Customer Engagement	20%	40%	40%	-	-
Consolidating Fleets & Optimising Routes	-	20%	45%	35%	-
Contingency	15%	20%	30%	20%	15%

Disaggregation costs

Disaggregation costs definition: The estimated additional recurring expenditure that results from dividing upper tier (i.e. county level) services into multiple new unitary authorities.

Method of calculation:

- Identified core service categories where disaggregation will drive cost increases as: adult social care, children's services, housing, place services, and corporate and support services.
- Allocated Kent County Council net revenue spend against cost categories defined.
- Applied percentages of additional spend to each cost category to uplift total costs in line with benchmarking from previous LGR cases, to estimate the future level of spend of each cost category.
- Applied an additional uplift to the level of disaggregation costs for each additional unitary being proposed.

Disaggregation costs

Disaggregation costs are the most significant differentiator between financial model outputs for each option. For each additional council proposed there are assumed to be additional costs, including those associated with management, commissioning and corporate services.

Whilst the costs are significant, it is important to view these within the context of the overall cost of delivering these services. The Kent County Council net revenue expenditure is budgeted to be£1,699m, including £722m for adult social care and £280m for children's services[44].

Table 35: *Disaggregation costs*

Option	Disaggregation costs (£m)	Commentary
3A	(19.7) - (29.2)	One additional set of 'upper tier' services means the lowest disaggregation costs of the options modelled.

Categories of disaggregation costs

As part of calculating disaggregation costs, costs increase by category of spend have been calculated, as summarised below.

A range has been applied specifically for disaggregation costs following collaborative discussions around different scenarios for the impact of LGR on commissioned spend across adult and children's social care.

Table 36*: Disaggregation cost categories and uplift percentages*

Disaggregation cost category	Description	Disaggregation cost uplift (one additional upper tier authority) %

[44] 2025/26 RA return and Financial returns submitted by Kent County Council

Adult social care	Duplication of some current adult social care management and staffing costs and potential for additional cost of commissioned spend.	0.7% - 1.8%
Children's services	Duplication of some current children's services management and staffing costs and potential for additional cost of commissioned spend.	2.5% - 3%
Place services	Duplication of some current place services including management and staffing costs, and additional costs of commissioned spend.	3.5%
Corporate and support services	Duplication of corporate & support services management, staffing and systems.	3.8%

Phasing of disaggregation costs

All disaggregation costs are assumed to be incurred annually from Day 1 of the new authorities.

Phasing and payback period

Payback period definition: the period taken to reach a net positive financial impact of LGR, once all one-off and recurring savings have been considered.

Cumulative financial benefit and payback period

Set out below is the year-by-year breakdown of the financial impact of LGR, considering both one-off costs and recurring benefits / costs.

The payback period is driven by the outputs of the three calculators (reorganisation savings, disaggregation costs and implementation costs), and the phasing assumptions explained earlier in this Appendix.

Table 37: *Payback period summary*

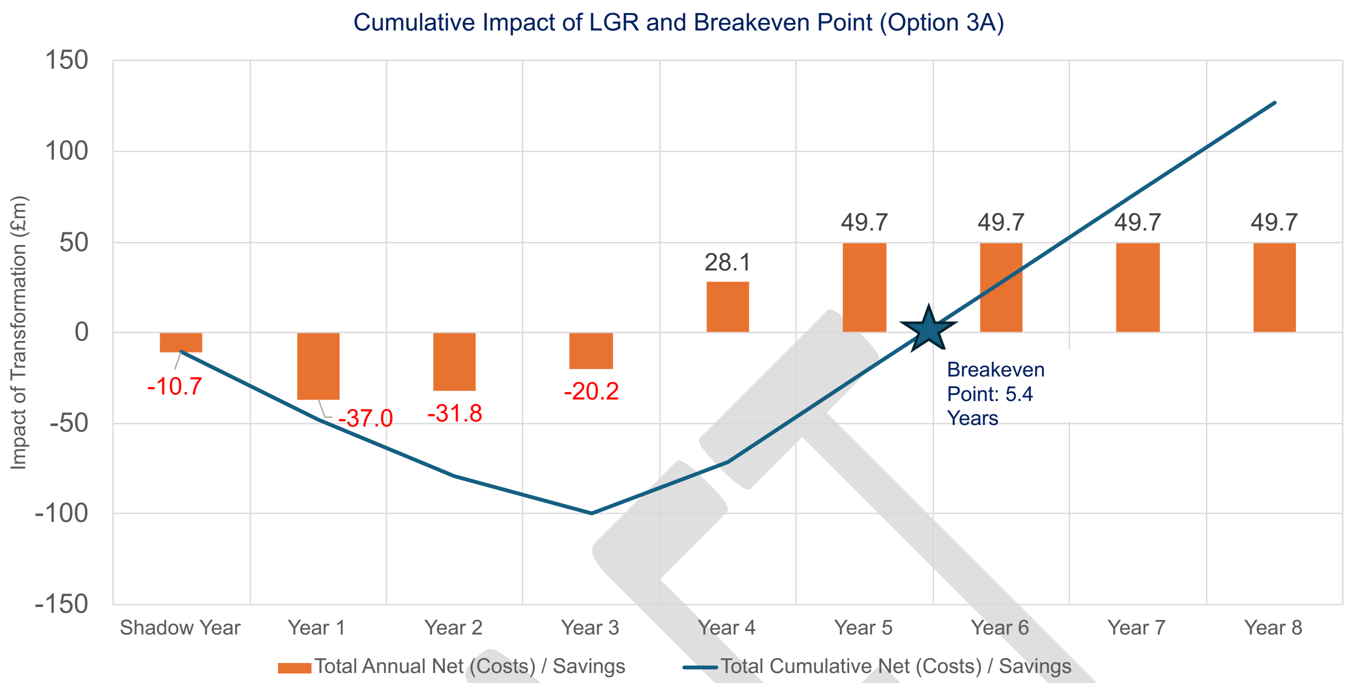
Option	Implementation costs (one-off) (£m)	Recurring annual revenue savings (£m)	Estimated payback period	Commentary
3A	(127.8)	40.2 – 49.7	5.4 – 6.7 years	Implementation complexity and costs are relatively high due to need to integrate and disaggregate to form three authorities, but lower than other models

Payback period shown over an 8-year period

Set out in the figure below is the estimated cumulative financial impact of LGR for the three-unitary council model.

DRAFT

Figure 23: *Payback over an 8-year period*



*The chart shows payback period with disaggregation costs at the lowest point in the range.

Appendix 3: Key data sources

Figure 8.1 – Key data set for government criteria analysis: Economy and Demographics

Metric	1A	3A			4B				4D				5A				
	All	North	West	East	North	West	East	Mid	North	West	East	Mid	North	West	East	Mid	South
Population Size (mid-2024)[45]	1,931,684	686,716	567,062	677,906	528,337	567,062	424,559	411,726	615,931	374,269	523,642	417,842	330,536	544,814	342,934	340,286	373,115
Geographic area (sq km) (2024)[46]	3,739.2	738.9	1,335.1	1,665.3	365.4	1,335.1	727.7	1,311.0	648.6	881.7	1,020.6	1,188.4	286.9	1,268.0	502.3	429.2	1,252.9
Population density (people per sq km) (2024)	516.6	929.4	424.7	407.1	1445.8	424.7	583.4	314.1	949.7	424.5	513.1	351.6	1152.1	429.7	682.7	792.9	297.8
65+ Population (mid-2024)[45]	384,033	113,951	113,406	156,676	83,544	113,406	99,972	87,111	102,437	74,636	123,715	83,245	52,329	108,477	77,559	59,227	86,440
Total GVA (£m) (2023)[47]	54,965	17,839	20,168	16,958	14,206	20,168	10,217	10,374	16,011	13,924	12,634	12,396	9,373	19,244	7,815	8,515	10,018
GVA per capita (£) (2023)[47]	28,454	25,977	35,566	25,015	26,888	35,566	24,065	25,196	25,995	37,204	24,127	29,666	28,356	35,322	22,788	25,024	26,850
Unemployment Rate (%) Apr 24-March 25[48]	3.7%	4.0%	3.0%	4.0%	3.8%	3.0%	4.3%	4.0%	3.5%	2.5%	4.2%	3.5%	3.9%	3.1%	4.7%	4.0%	3.5%

Figure 8.2 – Key data set for government criteria analysis: Financials

Metric	1A	3A			4B				4D				5A				
	All	North	West	East	North	West	East	Mid	North	West	East	Mid	North	West	East	Mid	South

45 https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/estimatesofthepopulationforenglandandwales
46 Standard Area Measurements for Administrative Areas (December 2023) in the UK
47 https://www.ons.gov.uk/economy/grossdomesticproductgdp/datasets/regionalgrossdomesticproductlocalauthorities
48 LI01 Regional labour market: local indicators for counties, local and unitary authorities - Office for National Statistics

Council tax base (number of band D equivalent properties) (FY28/29)[49]	703,525	225,749	231,972	245,804	173,700	231,972	151,628	146,225	202,762	156,102	187,882	156,779	111,995	222,260	120,136	110,931	138,203
Council Tax band D average (exc. Fire, Police and Parishes)[49]	1,907	1,842	1,904	1,907	1,842	1,904	1,874	1,907	1,904	1,874	1,907	1,907	1,842	1,904	1,874	1,812	1,907
General Fund Borrowing (FY26/27) (£m)[49]	1,730.4	812.0	289.1	629.2	740.3	289.1	387.0	314.0	761.3	175.9	460.0	333.1	336.8	278.4	257.2	468.7	389.3
Financing Costs (Q2 FY26/27) (£m)[49]	123.6	56.1	29.2	38.3	46.7	29.2	24.8	22.9	51.8	18.0	31.0	22.8	22.4	28.1	20.6	32.5	19.9
Net Revenue (Q2 FY26/27) (£m)[49]	2,313.4	1,104.6	548.2	660.5	947.7	548.2	415.2	402.3	1,024.7	376.0	521.9	390.8	432.7	526.6	338.0	655.7	360.4
Ratio of financing costs to net revenue stream (%)[49]	5.3%	5.1%	5.3%	5.8%	4.9%	5.3%	6.0%	5.7%	5.1%	4.8%	5.9%	5.8%	5.2%	5.3%	6.1%	5.0%	5.5%
Budget Gap (FY28/29) (£m)[49]	138.2	84.9	25.8	27.5	76.6	25.8	18.6	17.2	79.4	23.3	23.1	12.5	30.6	25.0	13.3	53.1	16.2
Total Usable Reserves (FY28/29) (£m)[49]	959.7	394.2	258.9	306.6	338.4	258.9	175.2	187.2	359.1	178.2	215.0	207.5	189.0	247.8	137.3	202.8	182.8
General fund balance (FY28/29) (£m)[49]	186.4	68.7	59.8	58.0	58.3	59.8	33.5	34.8	63.1	31.7	43.0	48.6	30.6	58.0	26.6	37.4	33.8
Retained Business Rates (£m) (2024-25)[50]	364.6	137.7	113.2	113.7	108.1	113.2	70.1	73.3	121.3	79.4	85.4	78.5	74.3	109.5	51.7	60.0	69.1
Net revenue expenditure (£m)[49]	2,273.8	833.2	651.0	789.6	645.8	651.0	494.3	482.7	748.0	432.1	609.8	483.8	397.2	625.4	405.2	416.4	429.5

[49] Financial data return submitted by councils
[50] National non-domestic rates collected by councils in England: forecast 2024 to 2025 - GOV.UK

Figure 8.3 – Key data set for government criteria analysis: Housing and Homelessness

Metric	1A	3A			4B				4D				5A				
	All	North	West	East	North	West	East	Mid	North	West	East	Mid	North	West	East	Mid	South
Income deprivation rate (2019)[51]	0.12	0.13	0.08	0.14	0.12	0.08	0.14	0.14	0.07	0.04	0.11	0.06	0.07	0.08	0.11	0.11	0.13
Homelessness Rate per 1,000 Households (Jan-Mar 2025)[52]	1.5	6.6	4.1	8.4	5.3	4.1	5.5	4.2	5.8	2.4	6.5	4.3	4.0	4.0	4.3	2.4	4.4
Housing Delivery Test 2023 Measurement %[53]	87.2%	84.4%	91.9%	86.2%	73.8%	91.9%	76.2%	109.9%	83.3%	67.6%	79.3%	120.4%	72.9%	93.9%	72.6%	89.5%	103.8%
Number of Households in TA per 1,000 (Jan-Mar 25)[54]	3.9	22.6	9.2	18.0	18.0	9.2	11.9	10.8	29.0	23.0	18.0	17.1	19.3	9.2	10.9	9.6	11.7
Area of land that is protected, including land designated as Green Belt (%)[55]	47.9%	41.0%	67.0%	35.7%	46.3%	67.0%	27.0%	40.5%	40.8%	82.7%	32.8%	38.9%	68.0%	65.5%	29.1%	32.3%	38.3%

Figure 8.4 – Children's Services and Special educational needs and disabilities (SEND)

Metric	1A	3A			4B				4D				5A				
	All	North	West	East	North	West	East	Mid	North	West	East	Mid	North	West	East	Mid	South
Number of children in children's social care as % total population (2023-2024)[56]	0.40%	0.50%	0.18%	0.47%	0.49%	0.18%	0.50%	0.48%	0.44%	0.18%	0.52%	0.28%	0.37%	0.18%	0.52%	0.61%	0.44%
Children's services total spend (£m)[57]	298.1	152.4	43.8	101.8	124.3	43.8	64.1	65.8	140.3	31.2	82.3	44.3	55.4	42.3	56.6	91.8	51.9
Number of registered pupils with SEND as % total population (2023-2024)[58]	5.0%	5.0%	4.3%	5.7%	4.3%	4.3%	6.0%	6.2%	4.9%	4.2%	6.0%	4.8%	4.4%	4.3%	6.1%	5.3%	5.5%

[51] Mapping income deprivation at a local authority level - Office for National Statistics
[52] Tables on homelessness - GOV.UK
[53] Housing Delivery Test: 2023 measurement - GOV.UK
[54] Tables on homelessness - GOV.UK
[55] Local authority green belt statistics for England: 2023 to 2024 - GOV.UK
[56] KCC analysis (districts) & ONS data (Medway) - https://explore-education-statistics.service.gov.uk/find-statistics/children-looked-after-in-england-including-adoptions/2024
[57] Data from individual councils
[58] KCC analysis (districts) & LG inform data (Medway) - https://lginform.local.gov.uk/dataAndReports/search/26797?text=Number+of+total+EHCP

Proportion of children in relative low-income families (under 16s) (FYE24) (%)[59]	17.8%	18.7%	13.2%	21.1%	18.4%	13.2%	22.3%	19.4%	18.7%	12.6%	22.2%	16.4%	17.3%	13.3%	21.7%	19.5%	20.5%
Proportion of children in absolute low-income families (under 16s) (FYE24) (%)[59]	15.1%	15.8%	11.3%	17.9%	15.7%	11.3%	18.9%	16.4%	15.9%	10.8%	18.7%	14.0%	14.8%	11.3%	18.3%	16.4%	17.4%
Safeguarding Concerns Received (2024/2025)[57]	24,750	7,619	6,353	10,778	5,886	6,353	7,275	5,236	6,833	3,830	8,918	5,169	3,680	6,102	5,374	3,772	5,821
Safeguarding Concerns Received Per 100,000 Population (2024/2025)[57]	261	1,452	1,444	1,985	1,467	1,444	2,129	1,613	1,452	1,326	2,117	1,581	1,471	1,443	1,953	1,440	1,957
Safeguarding Concerns Commenced (2024/2025)[57]	8,470	2,505	2,254	3,711	1,849	2,254	2,516	1,851	2,210	1,423	3,189	1,648	1,304	2,160	1,789	1,136	2,080
Safeguarding Concerns Commenced Per 100,000 Population (2024/25)[57]	562	478	512	683	461	512	736	570	470	493	757	504	521	511	650	434	699
Active Education, Health and Care plan (EHCPs) by Home District (As of Jan 2025)[57]	20,687	5,951	6,005	8,731	2,949	6,005	5,715	6,018	4,938	3,847	7,054	4,849	3,199	5,755	4,871	2,279	4,583
Active EHCPs by Home District rate per 10,000 (mid-2024)[57]	360	277	361	451	176	361	464	511	257	347	470	399	303	360	474	219	448
Active EHCPs by School District (as of Oct 2025)[57]	22,247	8,169	5,641	8,437	6,155	5,641	6,021	4,430	7,404	3,396	6,967	4,480	3,293	5,446	5,222	4,586	3,700
Active EHCPs by School District rate per 10,000 (as of Oct 2025)[57]	387	381	339	436	368	339	488	376	385	306	465	369	312	341	508	441	362
No. of Not in Education, Employment, or Training (NEET) Y12&Y13 (2024)[57]	1,689	658	420	611	476	420	447	346	590	245	521	333	279	405	357	350	298
NEET Rate per 10,000[57]	348	385	283	370	360	283	425	351	385	237	404	335	329	285	415	422	337
Child in Need Plans (Mar 2025)[57]	3,706	1,487	820	1,399	1,195	820	865	826	1,347	534	1,052	773	659	793	675	784	794

[59] https://www.gov.uk/government/statistics/children-in-low-income-families-local-area-statistics-2014-to-2024

Child in Need Plans Rate per 10,000[57]	87	92	65	104	94	65	104	95	93	62	103	85	82	65	100	100	105
Child Protection Plans (Mar 2025)[57]	1,428	582	324	522	465	324	333	306	531	190	427	280	247	317	259	314	291
Child Protection Plans Rate per 10,000[57]	34	36	25	39	37	25	40	35	37	22	42	31	31	26	38	40	38
Looked After Children (LAC) by placement address (Mar 2025)[57]	1,967	838	228	901	658	228	631	450	768	155	755	289	294	219	533	509	411
LAC by placement address - Rate per 10,000[57]	46	65	22	82	65	22	94	64	66	22	91	39	46	22	97	81	67
Unaccompanied Asylum-Seeking Children (UASC) looked after (Mar 2025)[57]	328	114	30	184	92	30	119	87	100	25	141	61	62	30	103	47	86
UASC looked after - Rate per 10,000[57]	8	7	2	14	7	2	14	10	7	3	14	7	8	2	15	6	11
Kent LAC Starts (2024/25)[57]	745	353	93	299	271	93	205	176	320	77	245	103	131	90	156	205	163
Kent LAC Starts Rate per 10,000[57]	22	27	9	27	27	9	30	25	28	11	29	14	21	9	28	33	27
Other Local Authority Looked After Children (OLA LAC) placed in Kent (Mar 2025)[57]	1,611	799	219	593	603	219	424	365	717	162	501	231	315	206	358	449	282
OLA LAC placed in Kent Rate per 10,000[57]	38	62	21	54	60	21	63	52	62	23	60	32	49	21	65	72	46

Figure 8.5 – Adult Services

Metric	1A	3A			4B				4D				5A				
	All	North	West	East	North	West	East	Mid	North	West	East	Mid	North	West	East	Mid	South

Number of older adults in adult social care as % total population (2023-2024)[60]	0.90%	0.68%	0.73%	1.17%	0.64%	0.73%	1.14%	1.06%	0.73%	0.65%	1.21%	0.91%	0.63%	0.74%	1.12%	0.70%	1.18%
Number of adults in adult social care as % total population (2023-2024)[60]	2.60%	2.41%	2.27%	2.98%	2.36%	2.27%	3.06%	2.73%	2.14%	2.28%	3.03%	1.49%	2.68%	2.29%	2.93%	2.12%	2.99%
Adult social care total spend (£m)[61]	634	202.8	162.3	268.9	159.7	162.3	162.9	149.2	185.6	109.1	214.8	124.5	83.6	155.3	117.4	115.7	162
No. of people aged 18 and over with Learning Disabilities accessing short term support during the year (2024-2025)[61]	405	92	81	232	47	81	157	120	77	41	197	91	47	81	109	34	134
People aged 18 and over with Learning Disabilities accessing short term support during the year - rate per 100,000 population (2024-2025)[61]	27	18	18	43	12	18	46	37	16	14	47	28	19	19	40	13	45
No. of people aged 18 and over with Learning Disabilities accessing long term support during the year (2024-2025)[61]	4,212	1,369	922	1,921	1,053	922	1,184	1,053	1,251	565	1,540	856	529	896	870	790	1,127
People aged 18 and over with Learning Disabilities accessing long term support during the year - rate per 100,000 population (2024-2025)[61]	279	261	210	354	262	210	346	324	266	196	366	262	211	212	316	301	379
Number of people accessing short term support during the year (18-64) (2024-2025)[61]	4,363	1,111	993	2,259	674	993	1,490	1,206	947	663	1,827	926	605	958	1,114	436	1,250

[60] KCC analysis (districts) & LG inform data (Medway) - https://lginform.local.gov.uk/reports/lgastandard?mod-metric=23182&mod-area=E06000035&mod-group=AllUnitaryLaInCountry_England&mod-type=namedComparisonGroup
[61] Data from individual councils

People accessing short term support during the year - rate per 10,000 population (18-64) (2024-2025)[61]	46	27	30	58	21	30	62	51	19	6	61	38	31	31	56	21	59
Number of people accessing short term support during the year (65+) (2024/2025)[61]	13,876	3,883	3,724	6,269	2,739	3,724	4,055	3,358	3,423	2,459	5,058	2,936	1,979	3,565	3,126	1,787	3,419
People accessing short term support during the year - rate per 10,000 population (65+) (2024/2025)[61]	413	341	328	400	328	328	406	385	334	329	409	353	378	329	403	302	396
Number of people accessing long term support during the year (18-64) (2024/2025)[61]	8,750	2,947	1,955	3,848	2,298	1,955	2,375	2,122	2,683	1,196	3,060	1,810	1,210	1,901	1,863	1,635	2,141
People accessing long term support during the year - rate per 10,000 population (18-64) (2024-2025)[61]	92	56	44	71	57	44	70	65	57	41	73	55	48	45	68	62	72
Number of people accessing long term support during the year (65+) (2024/2025)[61]	14,833	4,995	3,693	6,145	3,876	3,693	3,929	3,335	4,489	2,469	4,887	2,988	2,283	3,549	3,041	2,586	3,373
People accessing long term support during the year - rate per 10,000 population (65+) (2024-2025)[61]	442	438	326	392	464	326	393	383	438	331	395	359	436	327	392	437	390

Figure 8.6 – Democratic

Metric	1A	3A			4B				4D				5A				
	All	North	West	East	North	West	East	Mid	North	West	East	Mid	North	West	East	Mid	South
Size of electorate[62]	1,348,857	477,468	407,167	464,222	367,424	407,167	298,941	275,325	428,883	269,662	362,685	287,626	228,839	390,803	238,205	238,491	252,519
Councillor numbers	658	205	214	239	151	214	149	144	180	154	181	143	118	203	123	85	129

[62] Publicly available data

(including District and County)[62]																	
Councillor to electorate ratio (current)[62]	2,043	2,329	1,903	1,942	2,433	1,903	2,006	1,912	2,385	1,755	2,001	2,008	1,947	1,924	1,937	2,794	1,958
Level of civic participation (2023-2024) (%)[63]	40.6%	35.6%	43.9%	42.1%	20.4%	25.1%	24.0%	26.4%	21.2%	27.5%	25.2%	22.6%	24.0%	25.0%	22.1%	19.0%	28.1%

[63] https://www.gov.uk/government/statistics/community-life-survey-202324-annual-publication

This page is intentionally left blank

EQIA Submission Draft Working Template

Section A

1. Name of Activity (EQIA Title):

Local Government Reorganisation in Kent & Medway – Submission EQIA

The type of Activity you are undertaking

7. What type of activity are you undertaking?

Service Change – *operational changes in the way we deliver the service to people.* Answer Yes/No

Service Redesign – *restructure, new operating model or changes to ways of working.* Answer Yes/No

Project/Programme – *includes limited delivery of change activity, including partnership projects, external funding projects and capital projects.* Answer Yes/No

Commissioning/Procurement – *means commissioning activity which requires commercial judgement.* Answer Yes/No

Strategy /Policy – *includes review, refresh or creating a new document.* Answer Yes/No

Other – Please add details of any other activity type here.

Local Government Reorganisation.

8. Aims and Objectives and Equality Recommendations – Note: You will be asked to give a brief description of the aims and objectives of your activity in this section of the App, along with the Equality recommendations. You may use this section to also add any context you feel may be required.

Local authorities in Kent and Medway are responding to the Government's statutory invitation to submit proposals for Local Government Reorganisation (LGR), which seeks to replace existing local government structures with unitary models. This Equality Impact Assessment (EqIA) has been developed to assess the potential general implications of LGR and is not option specific. A more detailed and specific EqIA will be required once the government announces the final configuration of unitary councils across Kent and Medway.

The reorganisation of local government presents a valuable opportunity to redesign a system that better serves the diverse needs of Kent and Medway's residents. The 14 councils of Kent have collaborated to develop models reflecting established population and economic centres, as well as community and workplace patterns.

Through this joint effort, the councils have developed five business cases addressing the Government's six reform criteria, proposing to replace the current two-tier system with more efficient and resilient unitary authorities. These authorities aim to support devolution, enhance service delivery, and strengthen community engagement. Each proposal is underpinned by a shared evidence base, robust governance, transparent appraisal, and extensive stakeholder and public consultation, forming a united and evidence-led vision for the future of local government in Kent and Medway.

The move to LGR will involve aggregation and disaggregation of services across multiple tiers of local government, requiring the redesign and realignment of functions and responsibilities. This process will affect how services are structured, accessed, and experienced by residents, with particular implications for those with protected characteristics. It presents both challenges and opportunities, and while there may be short-term disruption as services are reorganised, there is also potential to create more coherent, inclusive, and responsive systems that better reflect the needs of Kent and Medway's diverse communities. Ensuring that equality considerations are central to this transformation will be critical to mitigating risks and maximising the benefits of reform.

This EqIA supports the LGR process by identifying and addressing the potential impacts of the proposed changes on those with protected characteristics under the Equality Act 2010, particularly regarding the potential disruption of bringing together and redesigning services from across the two upper tier authorities of KCC and Medway and the aggregation of services from the District and Borough Councils into unitary councils. It ensures that equality considerations are embedded throughout the development and implementation of the new model, and that the voices of Kent's diverse population are reflected in the decision-making process.

The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy proposals, service restructures, or operational changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation.

It should also be noted that the decision to implement Local Government Reorganisation has been taken by the Minister of State for Local Government and English Devolution, who will also make the decision on the geographies for the new Unitary Councils. Whilst it is appropriate that equalities impacts are considered by local authorities in implementing these decisions, the decision on the geographies for the new Unitary Councils lies with the Minister of State.

Section B – Evidence

Note: For questions 9, 10 & 11 at least one of these must be a 'Yes'. You can continuing working on the EQIA in the App, but you will not be able to submit it for approval without this information.

9. Do you have data related to the protected groups of the people impacted by this activity? *Answer: Yes/No*

Yes

10. Is it possible to get the data in a timely and cost effective way? *Answer: Yes/No*

Yes

11. Is there national evidence/data that you can use? ***Answer:*** *Yes/No*

Yes

12. Have you consulted with Stakeholders?
Answer: Yes/No
Stakeholders are those who have a stake or interest in your project which could be residents, service users, staff, members, statutory and other organisations, VCSE partners etc.

Yes

13. Who have you involved, consulted and engaged with?
Please give details in the box provided. This may be details of those you have already involved, consulted and engaged with or who you intend to do so with in the future. If the answer to question 12 is 'No', please explain why.

All Kent Councils have engaged with a broad range of key stakeholders as part of the development of all business cases for Local Government Reorganisation (LGR). This included an open public survey, which was carried out between 9 September and 10 October 2025. The survey was a standardised resident survey, agreed by all Kent Councils, which looked to understand what was important to residents for the creation of new unitary councils. A total of 2,107 responses were received from residents across Kent and Medway.

Stakeholder and Partner engagement has been ongoing since February 2025, for the interim submission in March 2025. The engagement has aimed to identify the key factors to consider in a reorganisation, along with the opportunities it could unlock, the problems it might solve, and the challenges it could introduce or fail to address. 50 written responses were received from a range of stakeholders included Police Force, Police and Crime Commissioner, Fire and Rescue, Health, Education, Voluntary Sector, Housing etc.

Kent Councils also recognised the value of close collaboration with strategic partners and the opportunities presented by Public Sector Reform, leading to workshops with key stakeholders including Health, Police, Education, and the DWP; these sessions explored the options under consideration through open discussions about current system challenges, existing strengths to preserve and build upon, and the potential improvements LGR could bring.

Both the survey and stakeholder engagement approach focused not on securing support for specific proposals, but on understanding the possible benefits, opportunities, concerns, and challenges associated with them.

14. Has there been a previous equality analysis (EQIA) in the last 3 years? *Answer: Yes/No*

No

15. Do you have evidence/data that can help you understand the potential impact of your activity? *Answer: Yes/No*

Yes

Uploading Evidence/Data/related information into the App
Note: At this point, you will be asked to upload the evidence/ data and related information that you feel should sit alongside the EQIA that can help understand the potential impact of your activity. Please ensure that you have this information to upload as the Equality analysis cannot be sent for approval without this.

Census 2021 Data

Section C – Impact

16. Who may be impacted by the activity? *Select all that apply.*

Service users/clients - *Answer: Yes/No*

Yes

Residents/Communities/Citizens - *Answer: Yes/No*

Yes

Staff/Volunteers - *Answer: Yes/No*

Yes

17. Are there any positive impacts for all or any of the protected groups as a result of the activity that you are doing? *Answer: Yes/No*

Yes

18. Please give details of Positive Impacts

The transition from a two-tier system to a single-tier structure of multiple unitary councils presents a range of opportunities to improve public services and outcomes for all communities, including those with protected characteristics. LGR supports more integrated and efficient service delivery, enhances local accountability, and enables more inclusive governance. It also strengthens place-based planning, promotes digital transformation, and facilitates the sharing of best practice.

LGR enables a strategic opportunity to advance public service reform with a whole-system approach to service delivery, fostering stronger integration both within council services and with external partners such as health and social care. For example, aligning Adult Social Care with Housing, or Children's Services with Housing Services, can lead to more coordinated and inclusive support for residents.

The establishment of new unitary authorities is intended to preserve local identity while embedding community voices in governance and service design. This includes ensuring that underrepresented and marginalised groups are actively involved in decision-making processes. The modernisation of systems, including the digitisation of services and the development of data and evidence hubs, will enhance operational efficiency and support more informed, equitable service design.

By aggregating services across areas such as education, housing, skills, and employment, councils will be better positioned to develop holistic strategies that respond to the diverse needs of individuals. LGR also strengthens place-shaping capabilities, allowing for more integrated planning of infrastructure and services that reflect the character and requirements of local communities.

Improved accessibility to council services is another anticipated benefit, particularly for residents in geographically larger or more diverse areas. The new structure will also facilitate the sharing of knowledge and best practice across Kent and beyond, promoting innovation and continuous improvement. Finally, the design of governance arrangements that reflect the diversity of Kent's population is expected to enhance local accountability and build trust between councils and the communities they serve.

Negative Impacts and Mitigating Actions

The questions in this section help to think through positive and negative impacts for people affected by your activity. Please use the Evidence you have referred to in Section B and explain the data as part of your answer.

19.Negative Impacts and Mitigating actions for Age

a) Are there negative impacts for Age? *Answer: Yes/No*
(If yes, please also complete sections b, c,and d).

Yes

b) Details of Negative Impacts for Age

Kent and Medway have a diverse age profile, with notable concentrations of both younger and older residents. In Kent, approximately 22.4% of the population is aged 60 and over, while 23.5% is aged under 20. The largest age cohort is those aged 50–59, accounting for 14.5% of the total population. Kent also has a slightly higher proportion of both 0–14-year-olds and people aged over 50 compared to the national average, with a median age of 42.3 years. There is variation in the age profile across Kent's districts, for example, the average age in Folkestone and Hythe is 45 years, compared to 37.3 years in Dartford. Medway has a younger overall population, with 16.4% aged 60 and over and 24.6% aged under 20. The largest age group in Medway is those aged 50–64, making up 19.2% of the population. The median age in Medway is 38 years, which is younger than both the South East regional average and the national average.

KCC has a significant proportion of staff aged 50 and over, reflecting an ageing workforce trend common in local government. Medway Council reports that 16.3% of its workforce is under 30, with an overall ageing staff profile also noted. At Tonbridge and Malling Borough Council, over 50% of the workforce is over 50 years of age, with only 7% under 30.

LGR may disrupt long-standing care relationships for older adults and continuity of support for children and families. Changes in staffing, service models, or administrative processes could lead to temporary delays or reassignment of cases, affecting the stability and quality of care. Differences in service access, eligibility, and support models across areas may also result in unequal experiences for residents depending on where they live.

For older people, particularly those in rural or coastal areas, there is a risk that changes to service structures could disrupt access to adult social care, health services, and community support. These services are often lifelines for older residents, and any transition period or reconfiguration could lead to confusion, delays, or reduced continuity of care.

Similarly, younger people, especially those accessing SEND services or transitioning between children's and adult services, may be affected by changes in service pathways. The reorganisation could result in temporary disruption or uncertainty around eligibility, referral routes, or support mechanisms if integration is not handled with sufficient clarity and safeguarding.

Digital transformation and centralisation of services, which are often associated with reorganisation, may disproportionately affect older residents who are less digitally literate or lack access to online platforms. This could lead to exclusion from information, engagement, or service access unless mitigated through inclusive design and alternative access routes.

There is a risk of fragmentation in multi-agency safeguarding, care coordination, and placement arrangements, which could impact vulnerable individuals. Workforce pressures, uneven resource distribution, and demographic demand—particularly in areas with higher dependency ratios—may further challenge service delivery.

The reorganisation may also have age-related implications for staff. Older staff may face concerns around job security, role changes, or redeployment, particularly if they are less mobile or nearing retirement. Younger staff, especially those early in their careers, may experience uncertainty around career progression or development opportunities. Without clear communication and support, these impacts could affect staff wellbeing, morale, and retention across age groups

c) Mitigating Actions for Age

To address the potential negative impacts of reorganisation on residents of different age groups, a range of mitigating actions would be implemented to ensure services remain accessible, inclusive, and responsive throughout the transition and beyond. This includes maintaining continuity in care relationships, safeguarding referral pathways, and ensuring that transitions between services are clearly communicated and well-managed.

Maintaining consistency in service standards, eligibility criteria, and care pathways will be essential to reduce the risk of fragmentation, particularly in adults and children's social care (including SEND). Continuity plans will focus on protecting care arrangements and ensuring that service pathways remain coherent across organisational boundaries.

Inclusive and more local service design will help mitigate the risk of digital exclusion, especially among older residents. Alternative access routes will be maintained, and digital transformation initiatives will be developed with accessibility in mind.

Workforce transition plans will be inclusive and responsive to the diverse needs of employees across age groups.

Demographic analysis will be embedded into planning processes to ensure services are responsive to the ageing population and the needs of children and young people.

The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy proposals, service restructures, or operational changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation.

d) Responsible Officer for Mitigating Actions - Age

To be determined

20. Negative Impacts and Mitigating actions for Disability

a) Are there negative impacts for Disability? *Answer: Yes/No*
(If yes, please also complete sections b, c,and d).

Yes

b) Details of Negative Impacts for Disability

In Kent, approximately 17.9% of the population is classified as disabled under the Equality Act, with a further 10.2% claiming disability-related benefits. The majority of these claimants report physical health conditions, followed by mental health and learning difficulties. The proportion of residents classified as disabled under the Equality Act varies across Kent's districts. Thanet has the highest rate, with 22.9% of its population reporting a disability, followed by Folkestone & Hythe (21.8%), Dover (21.2%), Canterbury (19.6%), and Swale (19.5%). These districts, primarily located in East Kent, all exceed the Kent average of 17.9%. In contrast, Dartford has the lowest proportion at 14.0%. In Medway, approximately 12.1% of the population is classified as disabled under the Equality Act.

The initial process of reorganisation may temporarily interrupt services due to staffing changes, IT issues, or the need to reconfigure contracts and delivery models. For people with physical disabilities, changes to service locations or formats could introduce barriers to access, particularly if physical infrastructure or transport links are not adequately considered.

Each new unitary may adopt different policies, eligibility criteria, or funding levels, which could affect capacity and consistency in service provision. For those with learning disabilities or mental health conditions, transitions in service structures may lead to confusion, anxiety, or disruption in care continuity. Clear communication, safeguarding, and co-designed pathways will be essential to ensure that these groups are not disadvantaged during or after reorganisation.

For specialist services that support different disability groups, economies of scale may be lost when breaking up county-wide contracts or shared services. This could result in disruptions to the services some residents receive or an overall reduction in quality due to cost-cutting measures.

Digital transformation, while offering efficiencies, may risk excluding individuals with cognitive impairments or those who rely on assisted technologies. Without inclusive design and alternative access routes, there is a risk of digital exclusion.

Functions such as public health, safeguarding, highways, or emergency planning may suffer from reduced coordination across newly defined boundaries. Opportunities to learn and share best practice on how to design services that meet specific needs might be lost or harder to share, potentially limiting improvements in care or access to new support options.

Staff with disabilities may experience specific concerns during the transition, including uncertainty around whether existing reasonable adjustments will be honoured, how inclusive the new structures will be, and anxieties about joining new teams or disclosing personal information. For staff with physical disabilities, changes to office locations or layouts could introduce challenges to access, particularly if physical infrastructure is not adequately considered

c) Mitigating Actions for Disability

Clear and consistent communication will be a focus, particularly for individuals with learning disabilities, cognitive impairments, or mental health conditions. Easy-read materials, alternative formats, and trusted communication channels will be used to help residents understand changes and navigate new service pathways.

Continuity planning will be embedded into service redesign, with a focus on safeguarding vulnerable individuals.

Digital transformation initiatives will be developed with accessibility in mind.

Workforce transition planning will include consideration of reasonable adjustments, and support through clear communication.

The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy proposals, service restructures, or operational changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation.

d) Responsible Officer for Mitigating Actions - Disability
To be determined.

21. Negative Impacts and Mitigating actions for Sex
a) Are there negative impacts for Sex? *Answer: Yes/No* *(If yes, please also complete sections b, c,and d).*
Yes
b) Details of Negative Impacts for Sex
In Kent and Medway, the population is broadly balanced by sex, with a slight majority of females, particularly in older age groups. Women are more likely to live longer, experience disability in later life, and take on unpaid caring responsibilities. Men, meanwhile, are statistically more likely to experience poorer mental health outcomes and lower engagement with preventative health services. These differences in lived experience and service interaction mean that changes to service structures may have distinct impacts based on sex. For women, particularly those accessing adult social care, domestic abuse support, or maternity services, there is a risk that service reconfiguration could disrupt continuity to gender-sensitive provision, particularly during the transitionary stage. Women are also more likely to be employed in frontline care roles, meaning workforce changes could disproportionately affect female staff. For men, there is a risk that changes to public health and mental health services could further reduce engagement, particularly if services are not designed to address known barriers such as stigma or low help seeking behaviour. Ensuring that services remain inclusive and responsive to male health needs will be critical.
c) Mitigating Actions for Sex
Services will remain responsive to the distinct needs of women and men, and ensure that any transition does not disrupt access to critical support. Workforce planning will take into account the gender profile of staff, especially in sectors such as social care and education where women are disproportionately represented and in areas such as waste management, transport, and certain technical services where men may be overrepresented. Measures will be taken to support staff through organisational change. The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy proposals, service restructures, or operational changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation.
d) Responsible Officer for Mitigating Actions - Sex
To be determined.

22. Negative Impacts and Mitigating actions for Gender identity/transgender
a) Are there negative impacts for Gender identity/transgender? *Answer: Yes/No* *(If yes, please also complete sections b, c,and d).*
Yes
b) Details of Negative Impacts for Gender identity/transgender
As data systems are migrated and reconfigured, there is an increased risk that sensitive information related to a resident’s transition may be mishandled. This includes the potential for pre-transition data to be used inappropriately, leaked, or lost, which could compromise privacy and dignity.

If specific support services linked to transitioning are disrupted during the reorganisation, transgender individuals may experience gaps in care or delays in accessing vital support. Maintaining continuity and safeguarding in these services is critical.

Transgender staff may face heightened concerns during organisational change, including anxieties about disclosing their identity to new colleagues, how their gender will be respected in new systems and teams, and whether existing adjustments or support will be maintained.

c) Mitigating actions for Gender identity/transgender

The new unitary councils would ensure that all policies and practices remain compliant with the Equality Act 2010, which provides protection for individuals with the protected characteristic of gender reassignment. Staff would be reminded of their responsibilities to treat all residents with respect and to maintain confidentiality regarding personal information. Any concerns raised by service users or staff will be addressed through the appropriate complaints and feedback mechanisms.

The new unitary councils would ensure that transgender staff are supported throughout the transition, with clear policies on respectful treatment, confidentiality, and continuity of any existing adjustments or support arrangements.

The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy proposals, service restructures, or operational changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation.

d) Responsible Officer for Mitigating Actions - Gender identity/transgender

To be determined.

23. Negative Impacts and Mitigating actions for Race

a) Are there negative impacts for Race? *Answer: Yes/No*
(If yes, please also complete sections b, c,and d).

Yes

b) Details of Negative Impacts for Race

In Kent, 89.1% of residents identified as White in the 2021 Census, with Asian or Asian British residents making up 5.4%, Black or Black British 2.1%, Mixed or Multiple ethnic groups 2.6%, and Other ethnic groups 0.8%. In Medway, the population is slightly more diverse: 84.3% identified as White, 5.9% as Asian or Asian British, and 5.6% as Black, Black British, Caribbean or African. These figures reflect growing ethnic diversity, particularly in urban areas such as Medway, Gravesham, and parts of North Kent.

There is a risk that service reorganisation could disrupt access to culturally appropriate services, particularly in areas such as health, education, housing, and community safety. For example, changes to local engagement structures or staff redeployment could weaken trusted relationships between communities and service providers, especially in areas with established community networks. Language barriers, digital exclusion, and experiences of discrimination may also compound the impact of any disruption.

In households where English is not the first language, there is a risk that access to interpreting, translation, or culturally appropriate services may become inconsistent if not prioritised across new unitary councils. This could lead to unequal access to essential information and support.

There may also be challenges if existing centralised equality infrastructure is disrupted during reorganisation. This includes the potential loss of coordinated anti-racism initiatives, shared expertise, and mechanisms that previously supported inclusive practice across wider service areas.

Minority ethnic staff may face anxieties during the transition, including concerns about how equality and inclusion will be upheld in new teams, whether cultural awareness will be maintained, and how they will be treated within unfamiliar organisational structures.

c) Mitigating Actions for Race

Local engagement mechanisms would be used to ensure communities can raise concerns and help shape services.

Clear and inclusive communication would be considered to ensure all residents can understand and access services—particularly those facing language barriers.

Workforce transition planning would include measures to uphold inclusive practices and cultural awareness within new teams.

The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy proposals, service restructures, or operational changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation.

d) Responsible Officer for Mitigating Actions – Race

To be determined.

24. Negative Impacts and Mitigating actions for Religion and belief

a) Are there negative impacts for Religion and Belief? *Answer: Yes/No*
(If yes, please also complete sections b, c,and d).

Yes

b) Details of Negative Impacts for Religion and belief

In Kent, the 2021 Census shows that 50.7% of residents identified as Christian, while 39.1% reported no religion. Other religious groups included Muslim (1.2%), Hindu (0.5%), Sikh (0.2%), and Buddhist (0.3%). In Medway, the religious profile is similar, with 48.3% identifying as Christian, 41.4% reporting no religion, and 6.1% identifying with other faiths, including Muslim (2.2%), Hindu (0.6%), and Sikh (0.3%). These figures reflect a growing diversity in religious affiliation, alongside a significant proportion of residents who do not identify with any religion. Religious affiliation varies notably across Kent's districts. Gravesham has the highest proportion of Sikh residents (8%), while Dartford has the highest proportion of Hindu residents (3.8%) and a relatively high Muslim population (3.5%). In contrast, districts such as Sevenoaks and Swale have higher proportions of residents identifying as Christian (51.8% and 47.2% respectively) and lower representation of minority faiths. The proportion of residents reporting no religion is highest in Swale (45.3%) and Thanet (44.1%), indicating a more secular population in those areas. In Medway, 45.1% of residents identified as Christian, while 43% reported no religion. Other religious groups included Muslim (2.7%), Hindu (1.1%), Sikh (1.6%), Buddhist (0.4%), and Jewish (0.1%).

Service reorganisation may disrupt access to faith-sensitive services such as culturally appropriate healthcare, burial arrangements, and community safety initiatives. If these services are not consistently prioritised across new structures, some faith communities may experience reduced accessibility or delays in support.

Changes to local engagement structures or staff redeployment may weaken established relationships with faith-based organisations that play a vital role in supporting vulnerable residents. This could affect the flow of local intelligence and reduce the effectiveness of referral pathways that help connect individuals to appropriate services.

There is a risk that the specific needs of faith communities may become less visible during the transition, particularly if engagement mechanisms are not maintained or adapted to reflect new governance arrangements. Without strong local engagement, religion and belief-related priorities may not be fully reflected in service planning or delivery.

While it may be difficult to quantify the full extent of these impacts, faith communities often provide essential support to older people, newly arrived populations, and those experiencing social isolation. As implementation progresses, careful consideration should be given to how engagement with faith groups is sustained and strengthened across all areas.

c) Mitigating Actions for Religion and belief

Service redesign would include consideration of faith-sensitive needs, particularly in areas such as healthcare, bereavement services, education, and community safety.

Local engagement mechanisms would be strengthened to maintain and build relationships with faith-based organisations. These organisations play a vital role in supporting vulnerable residents and providing local insight.

Communication materials and consultation processes would be designed to be inclusive and accessible. Where appropriate, translated materials and culturally appropriate outreach would be used to support engagement with diverse faith communities and ensure that all residents can understand and access services.

The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy proposals, service restructures, or operational changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation.

d) Responsible Officer for Mitigating Actions - Religion and belief

To be determined.

25. Negative Impacts and Mitigating actions for Sexual Orientation

a) Are there negative impacts for sexual orientation. *Answer: Yes/No (If yes, please also complete sections b, c,and d).*

Yes

b) Details of Negative Impacts for Sexual Orientation

In Kent and Medway, the majority of residents aged 16 and over identified as straight or heterosexual in the 2021 Census. In Medway, 89.7% of respondents identified as straight or heterosexual, while 3% identified as lesbian, gay, bisexual, or another sexual orientation (LGB+), and 7.3% chose not to answer the question. Across Kent's districts, the proportion of people identifying as straight or heterosexual ranged from approximately 89% to 91%, with between 2.5% and 3.5% identifying as LGB+, and 6% to 8% not responding to the question. These figures are based on data published by the Office for National Statistics at local authority level.

There are potential risks associated with how voluntary, community, and faith sector partners are engaged during reorganisation, particularly those providing support related to sexual orientation. Any disruption to funding streams, service coordination, or partnership working may have knock-on effects for LGBTQ+ residents who rely on these services.

Service reorganisation could also affect access to LGBTQ+ inclusive services, especially in areas such as mental health, housing, youth support, and community safety. If trusted relationships with specialist providers or community organisations are not maintained, residents may experience reduced support or feel less confident in accessing services.

LGBTQ+ staff may experience concerns during the transition about joining new teams, how inclusive the new working environment will be, and whether they will feel safe and supported in disclosing their identity or maintaining existing support arrangements.

c) Mitigating Actions for Sexual Orientation

Service redesign would consider services that LGBTQ+ residents' access, particularly in areas such as mental health, housing, youth services, and community safety.

Communication materials would be reviewed to ensure they are respectful and inclusive.

Workforce planning would consider the needs of LGBTQ+ staff, including ensuring inclusive team cultures and safeguarding the ability of individuals to disclose their identity safely and confidently within new organisational settings.

The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy proposals, service restructures, or operational changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation.

d) Responsible Officer for Mitigating Actions - Sexual Orientation

To be determined.

26. Negative Impacts and Mitigating actions for Pregnancy and Maternity

a) Are there negative impacts for Pregnancy and Maternity? *Answer: Yes/No*
(If yes, please also complete sections b, c,and d).

Yes

b) Details of Negative Impacts for Pregnancy and Maternity

In Kent and Medway, maternity and early years services support a significant number of residents each year, with demand influenced by local birth rates and population growth. Pregnant women and new parents often require timely, flexible, and locally accessible support across health, housing, and social care services.

During the initial stages of reorganisation, service disaggregation could lead to gaps in care, particularly in the transition from pregnancy to postnatal services. This may affect coordination with NHS partners and reduce the quality or continuity of care for some residents.

Variations in maternity support policies, childcare funding, and access to parenting programmes across different authorities may result in unequal support for new and expectant parents. Disruption to services such as health visiting, perinatal mental health, housing, and social care could disproportionately affect those with this protected characteristic.

Workforce changes may impact pregnant staff or those on or returning from maternity leave, especially in frontline health and care roles where women are overrepresented. Concerns may arise around redeployment, job security, and the continuation of reasonable adjustments or flexible working arrangements

c) Mitigating Actions for Pregnancy and Maternity

Service redesign would consider maternity and early years pathways, including perinatal mental health, health visiting, and housing support. This would help ensure that services remain responsive to the needs of pregnant individuals and new parents, and that any transition does not disrupt access to essential care.

Workforce planning would take into account the needs of pregnant staff and those either on or returning from maternity leave, particularly in frontline roles where women are overrepresented.

The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy proposals, service restructures, or operational changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation.

d) Responsible Officer for Mitigating Actions - Pregnancy and Maternity

To be determined.

27. Negative Impacts and Mitigating actions for marriage and civil partnerships

a) Are there negative impacts for Marriage and Civil Partnerships? *Answer: Yes/No*
(If yes, please also complete sections b, c,and d).

No

b) Details of Negative Impacts for Marriage and Civil Partnerships

Not completed.

c) Mitigating Actions for Marriage and Civil Partnerships

Not completed.

d) Responsible Officer for Mitigating Actions - Marriage and Civil Partnerships

Not completed.

Further assessment will be undertaken once a ministerial decision is taken on LGR in Kent and Medway. This will then feed into the design of services and through activities undertaken to prepare for vesting day.

28. Negative Impacts and Mitigating actions for Carer's responsibilities

a) Are there negative impacts for Carer's responsibilities? *Answer: Yes/No*
(If yes, please also complete sections b, c,and d).

Yes

b) Details of Negative Impacts for Carer's Responsibilities

In Kent, 135,895 people (9.1% of the population) reported providing unpaid care in the 2021 Census, with 43,166 individuals (31.8%) delivering 50 or more hours of care per week. In Medway, 24,113 people (8.6%) identified as unpaid carers, with 7,582 individuals (31.4%) providing 50 or more hours of care per week.

Carers may experience unequal access to support depending on how services are configured across different authorities. This includes potential variation in access to breaks, assessments, financial support, and eligibility criteria, which could lead to postcode-based inequalities.

During the transition, carers, especially those with limited digital access or complex caring roles, may struggle to find or access help. Disruption to services such as respite care, carers' assessments, or crisis support could increase stress and reduce their ability to sustain their caring responsibilities.

Carers' needs may be underrepresented in planning if data on caring responsibilities is not consistently captured or considered. This may particularly affect hidden or informal carers, who often face barriers to engagement and visibility in service design.

Staff with caring responsibilities may face additional pressures during the transition, particularly if changes to roles, teams, or working patterns reduce flexibility or disrupt existing support arrangements. Without careful planning, this could impact their ability to balance work and caring duties effectively.

c) Mitigating Actions for Carer's responsibilities

Service redesign would consider carer pathways, particularly in areas such as respite care, carers' assessments, and crisis support. This would help ensure that services remain responsive to the needs of unpaid carers and that any transition does not disrupt access to essential support.

Workforce planning would take into account the dual role of staff who also have caring responsibilities, and measures would be taken to support staff through organisational change.

The EqIA will be updated as proposals evolve, evidence is gathered, and engagement continues. Further EqIAs will be undertaken as specific policy proposals, service restructures, or operational changes emerge from the reorganisation process, ensuring that equality considerations are embedded at every stage of implementation.

d) Responsible Officer for Mitigating Actions - Carer's Responsibilities

To be determined.

This page is intentionally left blank

Overview and Scrutiny Committee

13 November 2025

Part 1 - Public

Recommendation to Cabinet

Cabinet Member	Cllr Matt Boughton
Responsible Officer	Damian Roberts, Chief Executive
Report Author	Gill Fox, Corporate Policy and Communities Manager Jeremy Whittaker, Economic Development and Special Projects Manager

Annual Service Delivery Plan Q2 (2025/26) Reporting

1 Summary and Purpose of Report

1.1 This covering report and annex provides data on the performance of the Council during Q2 of 2025/26 in relation to the milestones and Key Performance Indicators (KPIs) set out in the Annual Service Delivery Plan 2025/26.

2 Corporate Strategy Priority Area

2.1 By the very nature of the milestones and KPIs, and their role in monitoring the performance of the Council in meeting the vision and priorities set out in the Corporate Strategy 2023-2027, this report covers all four of the priority areas – Caring for the Environment; Improving Housing and Protecting Areas; Investing in our Borough and Local Economy; and Efficient and Effective Council.

3 Recommendations

3.1 That overall progress, including achievements to date and areas needing focus, **BE RECORDED**.

4 Introduction and Background

4.1 This Q2 report and Annex represents the consolidation of a new approach to performance management – replacing a suite of KPIs which had been in place since 2022, with a new Annual Service Delivery Plan that comprises both key activities and KPIs.

4.2 The breakdown of these activities and KPIs is divided up by the Corporate Strategy Priority Areas as follows:

Corporate Strategy Priority Area	**Activities**	**KPIs**
Caring for the Environment	15	14
Improving Housing and Protecting Areas	7	15
Investing in our Borough and Local Economy	15	10
Efficient and Effective Council	33	23
Total	**70**	**62**

5 Overview of Performance for Key Activities in Q2 (2025/26)

5.1 Whilst the detail is provided in Annex 1, the following table provides an overview of performance relating to the key activities in the Annual Service Delivery Plan for the period up to the end of September 2025:

Corporate Strategy Priority Area	Red	Amber	Green	Total
Caring for the Environment	0	3	12	15
Improving Housing and Protecting Areas1	2	2	3	7
Investing in our Borough and Local Economy	0	6	9	15
Efficient and Effective Council	1	7	25	33
Total	3	18	49	70

5.2 The RAG rating of these activities is based on the following definitions:

- Red – serious issues with dates being missed.
- Amber – some issues that are being managed with a need for close monitoring.
- Green – project is on track (with tick where completed).

5.3 A total of 49 activities (70%) were green-rated as of the end of Q2, which represents a strong level of performance. Of these, 11 activities have been completed by the end of Q2. Some highlights include:

Caring for the Environment:

- Procurement of all contracted waste and recycling services is on schedule with the tender evaluations currently being undertaken.
- Campaigns and events to increase recycling rates have been undertaken, with a main focus on reducing food waste.
- Refurbishment of the tennis courts at Tonbridge Racecourse Sportsground completed and in use by the public.
- Improvements to paths at Haysden Country Park have been completed.

- Solid progress being made on improving lighting between Town Lock and Vale Road.
- Drainage improvement works at Swanmead Sportsground completed.

Improving Housing and Protecting Areas:

- Considerable work ongoing in progressing towards Regulation 18 consultation.
- Occupation of Bridge House has now commenced.
- Tenders for the Bluebell Hill Accommodation Project went to Cabinet in September.
- Report on the Homelessness and Rough Sleeping Strategy well received by Members at Housing and Planning Scrutiny Select Committee in July 2025.

Investing in our Borough and Local Economy:

- People and Skills projects are starting to complete, and 71 local residents have so far supported through training and employment opportunities.
- The UK Shared Prosperity Fund Programme is progressing well – all projects are well-advanced and 35% of the budget has been spent at end of Q2.
- 100% of the Rural England Prosperity Fund allocation was allocated to projects in September 2025.

Efficient and Effective Council:

- Local Government Reorganisation – KPMG secured as the Strategic Partner with the council's preferred option included as part of the government-funded Kent-wide work ahead of submission in November 2025.
- Tonbridge Community Governance Review consultation undertaken in Summer 2025.
- Project Management training successfully delivered with subsequent report to Management Team seeking approval to deliver additional session.
- Independent Planning Advisory Service Review successfully undertaken.
- Community Awards Scheme opened with awards ceremony scheduled for November 2025.

5.4 Overall, only 3 activities (4%) were red-rated. These were all related to delays caused by Central Government:

a) 5.2 Prepare all system and staffing changes for the implementation of the Building Safety Levy as a key Government action arising out of the Grenfell Inquiry – **REASON:** the implementation of the levy has been delayed by Government by a year so that it will now come into effect in Autumn 2026.

b) 8.1 Give greater protection to people living in rented accommodation – **REASON:** As of the end of September 2025, the Renters Right Act legislation and guidance was still awaited from Government.

c) 13.12 Implement a new planning fee structure aligned to expected secondary legislation – **REASON:** the legislation has not yet been passed by Government.

6 Overview of Key Performance Indicators in Q2 (2025/26)

6.1 The following table sets out an overview of the status of the Key Performance Indicators within the Annual Service Delivery Plan 2025/26 as of the end of Q2 (end of September 2025):

Corporate Strategy Priority Area	KPI Status				Total
	Red	Amber	Green	N/A	
Caring for the Environment	2	2	9	1	14
Improving Housing and Protecting Areas	4	1	9	1	15
Investing in our Borough and Local Economy	2	2	4	2	10
Efficient and Effective Council	2	7	14	0	23
Total	10	12	36	4	62

NB: the N/A applies to KPIs that are either reported annually or have a long lag.

6.2 The definitions for the RAG-rating of the status are as follows:

- Red – indicator is below 10% variance of the target
- Amber – indicator is within 10% variance of the target.
- Green – indicator is on track or exceeding the target.

In Annex 1, the trend is also included for each Key Performance Indicator. The symbols indicate the following:

↑ - improving trend
↔ - static trend
↓ - worsening trend.

6.3 Of the KPIs that are rated, 58% (36 out of 62) are green-rated, which represents a satisfactory level of progress. Some highlights in Q2 include:

- KPI005: there has been greater activity on our communications relating to recycling to the extent that the annual target has been exceeded by the end of Q2.

- KPI016-19: indicators relating to the processing of planning applications and appeals have all greatly improved in Q2.
- KPI025: the number of households in Temporary Accommodation has dropped to its lowest figure (118) for two years (113 in Q2 2023/24)
- KPI030: the annual borough-wide Town Centres survey highlighted that vacancies were at 5.3% (in 2024/25 the figure was 5.8%). This drop occurred despite a slight increase in Tonbridge over the same period.
- KPI034: Income from Council events at the end of Q2 was over £35,000 and well on track to exceed the end of year target of £58,000.
- KPI043: Reported Anti-Social Behaviour cases were lower in the six months up to September 2025 in comparison to the same period in 2024 (233 vs 259).
- KPI047: Q2 saw a huge spike in the number of clicks on social media content due to Tonbridge Castle and events campaigns.
- KPI050: short-term sickness absence dropped to 2.7 days, the lowest it has been since Q3 of 2023/24.
- KPI062: 99.8% of invoices were paid within the 30-day deadline.

6.4 Overall, 10 KPIs (16%) are red-rated, these include:

- KPI001: as set out in report CE25/22 to the Communities and Environment Scrutiny Select Committee in July 2025, the Carbon Audit shows that the amount of CO_2e emitted through council assets and activities has increased. Whilst a small rise in emissions from heat and electricity at council offices could be as a result of increased staff days in the office and/or seasonal changes, the rise shown in the audit that is related to indirect emissions (such as from leisure facilities and contracts) is likely due to two main factors 1) data now being more accurately captured than it was in the past and 2) it has been identified that a gas meter was found to be faulty and has since been replaced; this meter may have been under-reporting consumption for some time, and subsequent readings are expected to provide a more accurate reflection of actual usage.
- KPI020: the number of planning enforcement cases open for more than 4 months increased to 77% as a result of focussing resource on tackling the more challenging cases in Q2. A concerted effort will be made to reduce this below the target of 68% in Q3.
- KPI024: the number of households made a successful Private Rented Sector Offer has stayed at 0 in Q2 and continues to be challenging. Whilst more informal support has been given to clients, it is expected that the additional resource that has been allocated by the Council will result in a number of offers being made in Q3 and Q4.
- KPI036 and 037: due to Tonbridge Castle not opening up again until early August 2025, KPIs relating to income and visitor numbers are currently below profile.
- KPI049: the number of vacant posts (12) has not dropped since Q1.

- KPI052 and 054: the Call Centre faced a number of challenges during Q2 that resulted in a dip in performance. This included issues with an external system and staff turnover and sickness. It is expected that these KPIs will pick up again in Q3.

7 Financial and Value for Money Considerations

7.1 None arising directly from this report.

8 Risk Assessment

8.1 Performance Management is identified in the Strategic Risk Register which highlights that without an effective performance management framework in place (such as that provided by the Annual Service Delivery Plan), the authority will not be able to understand any required improvements or achieve value for money.

9 Legal Implications

9.1 The matters raised in this report are considered to be routine, uncontroversial or not legally complex and a legal opinion has not been sought on these proposals.

10 Consultation and Communications

10.1 This data is used by the Council to communicate, both internally and to our communities, about our achievements as well as any areas of focus that the Council is working to improve.

11 Cross Cutting Issues

11.1 Climate Change and Biodiversity

11.1.1 The monitoring of the Annual Service Delivery Plan as of itself has a limited or low impact on emissions and environment, although there are measures within the plan which will have a more positive bearing on reducing carbon emissions and improving energy efficiency.

11.1.2 Climate change advice has not been sought in the preparation of the options and recommendations in this report.

11.2 Equalities and Diversity

11.2.1 The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

Background Papers	None
Annexes	**Annex 1 - Annual Service Delivery Plan Jul-Sep 2025 (Q2)**

Annex 1: Annual Service Delivery Plan – Q2 Update

Caring for the Environment - Activity:

Ref	Description of activity	Priority Action(s)	Milestones	Lead Officer	Cabinet Member	RAG Rating	Commentary
1.1	Install electric vehicle rapid charging points in the borough to support the reduction in carbon emissions from private transport.	Climate Change	Deliver 40 more electric vehicle rapid charging points in our car parks by March 2026.	Head of Technical Services	Finance, Waste and Technical Services		Target of 40 is dependent on the performance of the supplier and UKPN.
1.2	Install air source heat pumps to serve the fitness pool at Larkfield Leisure Centre to help meet our 2030 Climate Change goal.	Climate Change	Planning Application approved by Full Council by summer 2025 (if required). Works completed (including the removal of gas boilers) by March 2026.	Head of Administration and Property Services	Housing, Environment and Economy		Planning application not required. Works progressing on site.
1.3	Progress plans to decarbonise Tonbridge Pool heating system.	Climate Change	Preferred option agreed by Cabinet by November 2025.	Head of Administration and Property Services	Housing, Environment and Economy		
1.4	Decarbonise Gibson offices and install renewable technology.	Climate Change	Report tender outcome to Members and award contract in June 2025. Removal of gas boilers and installation of solar PV completed by March 2026.	Head of Administration and Property Services	Housing, Environment and Economy		Tender outcome reported to Cabinet on 03 June 2025. Funding transfer considered by Full Council in July 2025.
1.5	Assess relevant Council owned land as Biodiversity Net Gain sites for the borough.	Climate Change	Baselines established for Council owned land during summer 2025. Report outcome to Members by autumn 2025.	Head of Administration and Property Services / Climate Change Officer	Housing, Environment and Economy		Draft feasibility study received.
1.6	Evaluate use of Hydro-treated Vegetable Oil (HVO) for the waste contract vehicles.	Climate Change	Report setting out consideration of HVO proposals within the recommissioning of waste and recycling services to Members by December 2025.	Head of Street Scene and Leisure	Finance, Waste and Technical Services/Housing, Environment and Economy	✓	Report considered by Scrutiny Select Committee and way forward agreed.
2.1	Undertake the full procurement of all contracted waste and recycling services.	Recycling	Issuing of tender documentation in May 2025 Tender evaluation undertaken in December 2025. Report to Cabinet to approve preferred contractor in Spring 2026. Appointment of successful contractor in Spring 2026.	Head of Street Scene and Leisure	Finance, Waste and Technical Services		Tender documents issued in May 2025 with tender evaluation currently progressing including dialogue with contractors.

Ref	Description of activity	Priority Action(s)	Milestones	Lead Officer	Cabinet Member	RAG Rating	Commentary
2.2	Drive up greater recycling rates within our communities.	Recycling	2 council-run events that encourage recycling by March 2026. 2 'behaviour-change' campaigns (including fly-tipping) delivered by end of March 2026.	Head of Communication	Finance, Waste and Technical Services	✓	2 food recycling events completed – VE Day and Tonbridge Food Festival. Focus on food recycling campaign linked to 'No Food in Here' stickers being attached to all refuse bins.
2.3	Work with our contractors to minimise waste and remove single use plastics from their operations.	Recycling	Introduce greater use of refills and reduced waste from Council-owned sites by July 2025.	Climate Change Officer	Housing, Environment and Economy	☺	Guidance note for event recycling to be endorsed by CESSC in November 2025. Work undertaken with main contractor (TM Active) to reduce single use plastics.
3.1	Improve our designated Air Quality Management Areas (AQMAs) to help support a better environment for our residents.	Tackling Pollution	Revocation of 4 Air Quality Management Areas following improvements by March 2026.	Environmental Protection Manager	Housing, Environment and Economy	☺	On track to complete in Q3.
4.1	Invest in Tonbridge Racecourse Sportsground for our residents and visitors.	Parks and Leisure	Refurbish tennis courts by August 2025. Identify new options for the future use of the vacated bowls green by November 2025.	Leisure Services Manager (Outdoors)	Community Services	☺	Tennis courts resurfaced and fencing works completed. Painting to be completed. Options for the vacated bowls green currently being discussed in liaison with local members.
4.2	Upgrade paths and bridges at our Country Parks to improve accessibility for residents and visitors.	Parks and Leisure	Improve paths at Haysden Country Park by September 2025. Shallows Bridge Feasibility and Options Report reported to Cabinet by June 2025.	Leisure Services Manager (Outdoors)	Community Services	☺	Improvements to paths at Haysden Country Park completed. Cabinet have approved scheme for Shallows Bridge. Works to be progressed subject to removal of existing bridge and evaluation of abutments.
4.3	Implement lighting improvements between Town Lock and Vale Road to provide safer access for the public.	Parks and Leisure/Promoting Well-Being	Engage with the different landowners on this complex site by April 2025. Feasibility report to Finance, Regeneration and Property Scrutiny Select Committee in May 2025. Report to Cabinet to agree the scheme design by September 2025.	Director of Street Scene, Leisure and Technical Services	Community Services/Infrastructure and Tonbridge Regeneration	☺	Cabinet has approved the scheme and works to be progressed subject to any final comments the ecological study and feedback from Kent Wildlife Trust.
4.4	Improve the condition of playing pitches for our sports clubs at Swanmead sportsground.	Parks and Leisure	Improvements to the drainage undertaken by March 2026.	Leisure Services Manager (Outdoors)	Community Services	✓	Completed.
4.5	Increase the number of vaults at Tonbridge Cemetery.	Parks and Leisure	64 new vaults installed by December 2025.	Parks Officer	Community Services	☺	Works partially completed.

Caring for the Environment – Performance Targets:

Ref	Indicator	Description	Q1	Q2	Q3	Q4	Target 2025/26	Trend	Status	Commentary	Benchmarking	Lead Officer	Cabinet Member
001	TMBC Annual Carbon Audit Emissions Data (tCO2e)	Amount of CO2e emitted through council assets and activities.	N/A	**3,479**			**2,900**	↓		Reported to CESSC in July 2025.		Climate Change Officer	Housing, Environment and Economy
002	Total Attendance at TMLT Leisure Facilities	Total number of visitors to Larkfield Leisure Centre, Angel Centre, Tonbridge Swimming Pool, and Poult Wood Golf Course.	**375,299**	N/A			**1.5 m**	↔		Lag in data of around 3 months – Q1 shows a strong start to the financial year.		Leisure Services Manager	Community Services
003	Leisure Centre Income	Overall income generated by our Leisure Facilities as a % to profile.	**103.4%**	N/A			**Over 100%**	↑		Q2 figures awaited		Leisure Services Manager	Community Services
004	Leisure Centre Expenditure	Overall expenditure incurred by our Leisure Facilities as a % to profile.	**100.4%**	N/A			**Under 100%**	↑		Q2 figures awaited		Leisure Services Manager	Community Services
005	Improved recycling pages on TMBC website	Number of clicks via social media and other channels during 2025/26.	1,001	**2,446**			**2,000**	↑		Relates solely to food waste recycling pages.		Head of Communication	Finance, Waste and Technical Services
006	% household waste recycled and composted	Calculated comparing the amount of waste sent for recycling, reuse and composting against total waste collected.	**50%**	N/A			**54%**	↑		Q2 figures awaited	52.2% (TWBC) 49.6% (MBC) 38.2% (SDC) in 2023/24	Street Scene Manager	Finance, Waste and Technical Services
007	% of individual collections missed (waste)	Percentage of 'missed' residential kerbside collections.	**0.08%**	N/A			**0.10%**	↑		Q2 figures awaited		Street Scene Manager	Finance, Waste and Technical Services
008	Waste Collection Completions	% completion of scheduled collections.	**100%**	N/A			**100%**	↔		Q2 figures awaited		Street Scene Manager	Finance, Waste and Technical Services
009	Waste Collection Complaints	Number of formal complaints received about the waste collection service.	**62**	N/A			**160**	↓		Whilst complaints increased in Q1, they still represent a very small percentage of the total collections made (approximately **0.001%**). Q2 figures awaited		Street Scene Manager	Finance, Waste and Technical Services
010	Street Cleansing Complaints	Number of formal complaints received about street cleansing.	**5**	N/A			**20**	↑		Q2 figures awaited		Street Scene Manager	Finance, Waste and Technical Services
011	Air Quality Management Areas (AQMAs)	Number of AQMAs where NO2 results exceed the National Air Quality	**0**	N/A			**0**	↔		AQ results are calculated by calendar year so confirmed		Environmental Protection Manager	Housing, Environment and Economy

Ref	Indicator	Description	Q1	Q2	Q3	Q4	Target 2025/26	Trend	Status	Commentary	Benchmarking	Lead Officer	Cabinet Member
		objective for which they are declared.								for 2024. 2025 results will be available in Q1 26/27			
012	Fly Tipping	Number of reported incidents of fly tipping in the borough	**254**	N/A			**975**	↑		Q2 figures awaited		Street Scene Manager	Finance, Waste and Technical Services
013	Green Flag Status	Number of our parks with a Green Flag Status.	3	**3**			**3**	↔		Tonbridge racecourse Sportsground, Leybourne Lakes Country Park and Haysden Country Park.	45 (across Kent – June 2025)	Leisure Services Manager (Outdoors)	Community Services
014	Environmental Fixed Penalty Notices (FPNs)	% of environmental FPNs served that are paid.	N/A	N/A			**65+%**			Collation of data from Contractor results in details shared one quarter behind due to period of time payment is due.		Street Scene Manager	Finance, Waste and Technical Services

Improving Housing and Protecting Areas – Activity:

Ref	Description of activity	Priority Action(s)	Milestones	Lead Officer	Cabinet Member	RAG Rating	Commentary
5.1	Implement the 25/26 milestones in the Local Development Scheme to work towards producing a Local Plan that accommodates sustainable growth and protects our important green spaces.	Local Plan and Housing	Community (Reg 18) Consultation materials (including approach to Member Engagement) considered by Housing and Planning Scrutiny Select Committee and approved by Cabinet in December 2025. Successfully undertake community consultation on the Local Plan in Winter 2025.	Planning Policy Manager	Planning		Consultation will take place in Autumn/Winter 2025, subject to Members agreeing the Draft Regulation 18 Stage 2 Local Plan consultation document.
5.2	Prepare all system and staffing changes for the implementation of the Building Safety Levy as a key Government action arising out of the Grenfell Inquiry.	Local Plan and Housing	Report to Cabinet in Spring 2026 setting out formal preparations for the introduction of Building Safety Levy implementation in Autumn 2026.	Head of Planning	Infrastructure and Tonbridge Regeneration		The Building Safety Levy, which will impose a charge on developers for new residential buildings to fund building safety improvements, has been delayed and will now come into effect in Autumn 2026, rather than Autumn 2025, according to the government's technical consultation response. The delay is intended to give developers and local authorities more time to prepare for the levy's implementation.
6.1	Deliver a refreshed approach to Local Lettings Plans for new homes.	Affordable Housing	Local Lettings Plan policy agreed by Cabinet in June 2025. Implementation report to Housing and Planning Scrutiny Select Committee in December 2025.	Head of Housing and Health	Housing, Environment and Economy		Local Lettings Policy approved and adopted by Cabinet in June 2025. The Implementation report is within the work plan.
6.2	Work with the private sector housing market to increase housing solution opportunities for our residents.	Affordable Housing	Report detailing work to date with the Private Sector (including revised Landlord Incentive Scheme) presented to Housing and Planning Scrutiny Select Committee in Autumn 2025. Delivery of a Landlord event in Autumn 2025.	Head of Housing and Health	Housing, Environment and Economy		Will be reported to Housing and Planning Scrutiny Select Committee in December 2025 due to movement of the October meeting.
7.1	Increase the supply of Temporary Accommodation aligned to significant growth in housing demand.	Housing Support	20 additional units of Temporary Accommodation owned or managed by the Council by March 2026.	Head of Housing and Health	Housing, Environment and Economy		Occupation of Bridge House commenced. Tenders for the Bluebell Hill Project went to Cabinet in September 2025.
7.2	Adopt and implement a Homelessness Strategy to support our most vulnerable residents.	Housing Support	Homelessness Strategy considered by Scrutiny Select Committee by December 2025. Homelessness Strategy adopted by Cabinet by March 2026.	Housing Solutions Manager	Housing, Environment and Economy		Report to Housing and Planning Scrutiny Select Committee in July 2025 setting out timescale as set out in the ASDP.
8.1	Give greater protection to people living in rented accommodation.	Rented Accommodation	Report on the Renters (Reform) Act agreed by Cabinet in Summer 2025 **(NB Now updated to the Renters Rights Act)** Requirements of the **Renters Rights Act** successfully implemented and managed by March 2026.	Housing Improvement Manager	Housing, Environment and Economy		As of September 2025, Legislation and guidance are still awaited. Implementation of the Act is expected in early 2026 at the earliest.

Improving Housing and Protecting Areas – Performance Targets:

Ref	Indicator	Description	Q1	Q2	Q3	Q4	Target 2025/26	Trend	Status	Commentary	Benchmarking	Lead Officer	Cabinet Member
015	5-year Housing Land Supply (years)	A calculation of whether there is a deliverable supply of homes to meet the planned housing requirement.	2.89	**2.89**			**5 years**	↔		Based on a housing need of 1,096 dwellings per year and the application of a 20% buffer.		Head of Planning	Planning
016	Processing of 'Major' Planning Applications (% rate)	Percentage calculated as the number of major applications processed within the 13-week timescale. Government target is 60%.	88%	**100%**			**91%**	↑		Performance remains strong in the 'Major' category and is significantly above the national target.		Head of Planning	Planning
017	Processing of 'Minor' Planning Applications (% rate)	Percentage calculated as the number of minor applications processed within the 8-week timescale. Government target is 65%.	69%	**95%**			**76%**	↑		Similarly, performance has improved in Q2 from a disappointing start in Q1. Staffing is more stable and this has resulted in increased performance.		Head of Planning	Planning
018	Processing of 'Other' Planning Applications (% rate)	Percentage calculated as the number of 'other' applications processed within the 8-week timescale. Government Target is 80%.	77%	**94%**			**90%**	↑		Performance is strong in this category and is well above the national target.		Head of Planning	Planning
019	Planning Appeals - dismissed	Percentage of appeals dismissed against the Council's refusal of planning permission.	65%	**83%**			**70%**	↑		The appeal performance in Q2 has been strong for quality of decision making.		Development Manager	Planning
020	Planning Enforcement	Number of Planning Enforcement Cases left open more than 4 months.	70%	**77%**			**68%**	↓		The number of open cases has seen a rise in Q2, but this has been due to a focus of tackling the more challenging cases and looking to serve a number of enforcement notices.		Head of Planning	Planning
021	Tree Preservation Orders	Number of TPO applications in the historic backlog reported to Members in December 2024.	58	**42**			**0**	↑		Progress is being made on reducing the backlog with 42 cases remaining from the original 60.		Head of Planning	Planning
022	Housing Register	Total number of people on the housing register	**343**	N/A			**800**	↑		Q2 figures awaited.		Head of Housing and Health	Housing, Environment and Economy
023	Affordable Housing	Number of Affordable Homes built out per annum.	N/A	N/A			**170**				193 (MBC) 119 (TWBC) 35 (SDC) in 2023/24	Head of Housing and Health	Housing, Environment and Economy
024	Private Rented Sector	Number of households made a successful Private Rented Sector Offer.	0	**0**			**24**	↓		Accessing the Private Sector remains challenging and although we have supported a number of clients informally (e.g. through rent deposits)		Head of Housing and Health	Housing, Environment and Economy

Ref	Indicator	Description	Q1	Q2	Q3	Q4	Target 2025/26	Trend	Status	Commentary	Benchmarking	Lead Officer	Cabinet Member
										these have not been formal Private Rented Sector offers.			
025	Temporary Accommodation	Average number of all households in temporary accommodation as at end of the quarter.	122	**118**			**120**	↑			283 (MBC) 75 (TWBC) 70 (SDC) in Q3 of 2024/25	Head of Housing and Health	Housing, Environment and Economy
026	Empty Properties	Number of properties in the borough that have been unfurnished and unlived in for longer than 6 months.	456	**476**			**375**	↓				Head of Housing and Health	Housing, Environment and Economy
027	Improving Housing Conditions	Number of properties where conditions have improved (cumulative)	24	**48**			**80**	↑				Head of Housing and Health	Housing, Environment and Economy
028	Housing Enforcement Notices	Number of Housing Enforcement Notices Served.	1	**0**			**3**	↔				Head of Housing and Health	Housing, Environment and Economy
029	Disabled Facilities Grants (cumulative)	Number of homes adapted or improved for older and vulnerable residents to promote their independence and keep them safe in the community.	26	**39**			**80**	↑				Head of Housing and Health	Housing, Environment and Economy

Investing in our Borough and Local Economy – Activity:

Ref	Description of activity	Priority Action(s)	Milestones	Lead Officer	Cabinet Member	RAG Rating	Commentary
9.1	Drive forward Tonbridge Town Centre Regeneration Plans.	Using Land and Assets Better	Following the completion of the community engagement phase in Spring 2025, Masterplan for the Town Centre adopted by Cabinet by September 2025.	Head of Administration and Property Services	Infrastructure and Tonbridge Regeneration		Report to Cabinet on 14th October following a report to Cabinet on 30th June and then a public engagement survey to obtain the public's views on the proposed developments within Masterplan Framework Report
9.2	Make solid progress on our plans to improve leisure provision in Tonbridge.	Using Land and Assets Better	Progress plans for replacement Angel Leisure Centre to RIBA Stage 2 (initial concept design) by autumn 2025.	Head of Street Scene and Leisure	Infrastructure and Tonbridge Regeneration		Progress being made in accordance with agreed timescale.
9.3	Implement early phases of Tonbridge Farm Sportsground masterplan to provide improved, accessible leisure facilities for the whole community.	Using Land and Assets Better	Approval of Tonbridge Farm business plan by Cabinet in Spring 2025. Improve or replace existing facilities (including new pavilion roof and all-weather pitches) in accordance with the masterplan for the site by March 2026.	Head of Street Scene and Leisure	Infrastructure and Tonbridge Regeneration		Masterplan approved. Implementation of scheme subject to development of business plan and securing funding from external sources e.g. developer contributions, Football Association grants, etc.
9.4	Improve Bailey Bridge East car park in Aylesford.	Using Land and Assets Better	Improve car park to provide additional spaces, CCTV and new surface by Spring 2025.	Head of Technical Services	Finance, Waste and Technical Services		Scheme delayed due to staff resources and need to submit formal planning application. Proposed to appoint external consultants to assist in progressing scheme.
9.5	Stabilise flood mitigation protection at Wouldham River Wall.	Using Land and Assets Better	Complete RIBA Stage 1 (Preparation and Briefing) by Summer 2025. Design and Procurement for the mitigation protection works in Spring 2026.	Head of Technical Services	Infrastructure and Tonbridge Regeneration		Scheme delayed due to staff resources.
10.1	Ensure investment in infrastructure is aligned to population and housing growth.	Economy Bouncing Back	Produce fully costed and dated Infrastructure Delivery Plan and Funding Statement to inform the Local Plan by Summer 2025.	Planning Policy Manager	Planning		Work is progressing on the Infrastructure Delivery Plan (IDP) to support the Local Plan including engagement with infrastructure providers. An Interim IDP will be published alongside the Reg 18 stage 2 Local Plan.
10.2	Delivery of the Tonbridge and Malling UK Shared Prosperity Fund (including Rural England Prosperity Fund) to support our businesses and residents.	Economy Bouncing Back	£327,000 of funding spent on projects by March 2026. 100% of Rural England Prosperity Fund allocated to eligible projects by November 2025.	Strategic Economic Regeneration Manager	Housing, Environment and Economy		All UKSPF projects progressing with around 35% of the budget spent as of the end of September. 100% of REPF allocated by 05 September 2025. Funding will need to be spent by projects by the end of the financial year.

Ref	Description of activity	Priority Action(s)	Milestones	Lead Officer	Cabinet Member	RAG Rating	Commentary
10.3	Establish and implement a new programme to support the local economy using Business Rates Pool funding.	Economy Bouncing Back	Business Rates Pool Programme agreed by Cabinet in September 2025, with implementation from October 2025 onwards.	Strategic Economic Regeneration Manager	Housing, Environment and Economy		Business Rates Pool (Shared Growth Fund) Programme approved by Cabinet in June 2025. A number of the projects in the programme are in the process of being implemented.
10.4	Delivery of People and Skills Grant Scheme that creates training and employment opportunities for our residents.	Economy Bouncing Back	Round 1 Funded projects completed by December 2025, supporting 100 residents. Cabinet Member approval to launch a Round 2 in June 2025.	Strategic Economic Regeneration Manager	Housing, Environment and Economy		Projects starting to complete as of 30 September - with over 70 residents benefiting from completed projects to date (more than half of projects still to complete). Approval given for Round 2 in April 2025 and launched in May 2025 with a deadline for submissions of 18 June 2025. In total, 10 projects were awarded funding.
10.5	Implement a new Street Trading policy that supports our businesses, enhances our towns and generates maximum community benefit.	Economy Bouncing Back	Implementation of new policy by September 2025.	Licensing Inspector	Housing, Environment and Economy / Community Services		Delayed due to staffing changes.
10.6	Support the introduction of a new Banking Hub in Tonbridge that provides face-to-face personal and business banking services.	Economy Bouncing Back	Temporary Banking Hub up and running by Summer 2025. Permanent location for the Banking Hub secured by March 2026.	Strategic Economic Regeneration Manager	Housing, Environment and Economy / Community Services		Temporary Banking Hub opened in June 2025. Cash Access have identified potential High Street properties for their permanent location.
11.1	Help drive visitor numbers to Tonbridge Castle through events and activities.	Profile of Assets	Deliver a Summer marketing campaign during June to September 2025. Implement new activities following loss of the Gateway Service by March 2026.	Head of Communication / Tonbridge Castle, Events and Customer Services Manager	Community Services		Marketing campaign began in June and ran through the summer. Work ongoing on new activities.
11.2	Install new Digital Information Boards to help improve real-time communication with our residents.	Profile of Assets	Project approved by Cabinet by Summer 2025. New Digital Information Boards installed at locations across the borough by March 2026.	Head of Communication / Director of Central Services	Community Services		Whilst work is ongoing, delays have been caused by loss of key staff. Scheduled for installation in 2026/27
12.1	Work with strategic partners to bring forward/complete key employment sites.	Strategic Partners	Panattoni Park Aylesford (one of the largest logistics developments in the Southeast) fully built out and occupied by October 2025. Planning application approved for new Science and Innovation Building at East Malling Research (NIAB EMR) by December 2025. RBLI Centenary Village Phase 2 completed and occupied by December 2025.	Head of Planning / Strategic Economic Regeneration Manager	Planning / Housing, Environment and Economy.		Panattoni Park Aylesford – completed. No application submitted yet at NIAB EMR. Centenary Village partly occupied but not yet completed.

Ref	Description of activity	Priority Action(s)	Milestones	Lead Officer	Cabinet Member	RAG Rating	Commentary
			Application for RBLI Factory Development to be determined by summer 2025. London Golf Club planning application determined by spring 2025. Buckmore Park planning application determined by summer 2025 (subject to submission in early 2025).				RBLI Factory Development approved on 26 August 2025. London Golf Club application determined in April 2025. Buckmore Park application approved on 30 June 2025.
12.2	Support the Environment Agency with the completion of Leigh Expansion and Hildenborough Embankment Scheme.	Strategic Partners	Completion of scheme and full payment of Council contribution by November 2025.	Strategic Economic Regeneration Manager	Infrastructure and Tonbridge Regeneration		Visit to the LFSA with completion of the expansion scheduled for November 2025. The Hildenborough Embankment scheme is scheduled for completion in January 2026.

Investing in our Borough and Local Economy – Performance Targets:

Ref	Indicator	Description	Q1	Q2	Q3	Q4	Target 2025/26	Trend	Status	Commentary	Benchmarking	Lead Officer	Cabinet Member
030	Town Centre Vacancy Levels (%)	The number of commercial retail units in our town and village centres that are vacant as a % of the total number.	N/A	**5.3%**			**5.7%**	↑		Tonbridge currently has the highest void rate in the borough at 6.4% although this is much below the national average.	13.9% (UK); 14% (TW) in 2024.	Strategic Economic Regeneration Manager	Housing, Environment and Economy
031	Business Births and Deaths	The ratio of business births to business deaths	N/A	N/A			**1.00**			Data will be available in late November 2025.	0.78 (MBC); 0.99 (TWBC); 1.05 (SDC) in 2024	Strategic Economic Regeneration Manager	Housing, Environment and Economy
032	Unemployment Rate (%)	The % of the workforce that are claiming unemployment benefits.	2.4%	**2.4%**			**2.2%**	↔		Unemployment rate currently plateau-ing.	3.4% (Kent) 3.3% (MBC) 2.5% (TWBC) 2.1% (SDC) in Q1 2024/25	Strategic Economic Regeneration Manager	Housing, Environment and Economy
033	Occupation of Rental Properties	The % of council-owned commercial properties that are in occupation	100%	**100%**			**100%**	↔				Head of Administration and Property Services	Housing, Environment and Economy
034	Council Events – Income	Total income generated from council run/supported events.	£25,429	**£35,697**			**£58,000**	↑				Tonbridge Castle, Events and	Community Services

Ref	Indicator	Description	Q1	Q2	Q3	Q4	Target 2025/26	Trend	Status	Commentary	Benchmarking	Lead Officer	Cabinet Member
												Customer Services Manager	
035	Property Rentals – Income	Total Income generated from commercial property rentals.	£99,995	**£180,521**			**£420,000**	↓		Q2 - £80,526		Head of Administration and Property Services	Housing, Environment and Economy
036	Tonbridge Castle - Income	Total income generated by activities at Tonbridge Castle (Figure includes: Chamber Hire; Tea/coffee sales; Weddings; Castle Attraction and Artisan Market)	£15,236	**£41,893**			**£95,000**	↓		Castle reopened on 03 August to visitors and weddings following a long closure for essential repairs.		Tonbridge Castle, Events and Customer Services Manager	Community Services
037	Tonbridge Castle – Tour Visitor Numbers	Total number of visitors to Tonbridge Castle that take the tour (NB first few months of 25/26 the castle will be closed)	0	**630**			**3,000**	↓		Castle attraction opened on 03 August – so playing catch-up		Tonbridge Castle, Events and Customer Services Manager	Community Services
038	Employment Land	% net change (gain/loss) in employment land	N/A	N/A			**0%**					Planning Policy Manager	Planning
039	People and Skills Fund	Number of local residents benefitting from projects completed through the People and Skills Fund	0	**71**			**100**	↑		Scheduled to exceed the target by the end of the financial year.		Strategic Economic Regeneration Manager	Housing, Environment and Economy

Efficient and Effective Council – Activity:

Ref	Description of activity	Priority Action(s)	Milestones	Lead Officer	Cabinet Member	RAG Rating	Commentary
13.1	Ensure that the Council maximises the opportunities to influence the implementation of the Government's Devolution/Local Government Reorganisation agenda within Tonbridge and Malling in the interests of local residents and takes action to navigate a path that minimises the inherent risks and uncertainty associated with this type of process.	Innovative and Cost-Effective Services	Actively contribute to the Government's process for determining the Local Government Reorganisation geography across Kent and Medway by submitting proposals for new Unitary Authorities by November 2025. Establish formal programme management arrangements to ensure the Council is fully engaged in managing the preparation and transition process by Winter 2025. Complete a Community Governance Review for a Town Council in Tonbridge during 2025/26: • Initial report (including Terms of Reference) to Members in May 2025 • Consultation undertaken in Summer 2025 • Final recommendations to Council by March 2026.	Chief Executive	Executive Leader		Chief Executive now chairs the LGR Steering Group across Kent, and was on the procurement group to secure the Strategic Partner KPMG. Agreement secured to fund this Council's preferred option from the Government funding for Kent. Workstreams being developed for both West Kent Councils and Kent as a whole that will commence after the deadline for final submissions in November 2025. Consultation undertaken in Summer 2025 and results scheduled to go Full Council in October 2025. Final report scheduled for February 2026.
13.2	Bring forward a comprehensive approach to transformation in the Council.	Innovative and Cost-Effective Services	5 Wider Management Team meetings during 2025/26. Reporting to Overview and Scrutiny Committee and Cabinet on Annual Service Delivery Plan 2025/26 (including performance targets) starting in Summer 2025 (Q1). 5 awards applications submitted by March 2026 to recognise Council successes.	Chief Executive	Executive Leader		There have been 3 WMT meetings during 2025/26 to date - 09 April, 18 June and 25 September. Q1 reporting on track with the process of Q2 reporting having commenced in mid-September 2025. NB - as of Q2: 3 - Civic Society Awards for Wet Room and Green Business Shelter, plus Silver Armed Forces Award. Applications to the LGC Awards pending.
13.3	Develop a robust Council-wide Project Management approach. that drives forward successful delivery.	Innovative and Cost-Effective Services	Develop and Implement new Project Management templates by Spring 2025. Ensure all projects have a manager and sponsor by summer 2025. Project Management training takes place in summer 2025.	Strategic Economic Regeneration Manager / Tonbridge Town Centre Programme Manager	Executive Leader		Templates published on StaffNet (May 2025), with Project Management becoming embedded within the organisation. Last planned training session scheduled for 01 October 2025.
13.4	Refresh and update Medium Term Financial Strategy (MTFS) in light of new Government priorities and the direction for local government funding to be	Innovative and Cost-Effective Services	Refresh MTFS in November 2025 with update for Budget Setting in February 2026.	Head of Finance	Finance, Waste and Technical Services		Work to update the MTFS commenced in September 2025.

Ref	Description of activity	Priority Action(s)	Milestones	Lead Officer	Cabinet Member	RAG Rating	Commentary
	set out in the Spring (2025) Fair Funding Review.						
13.5	Undertake a base budget review across all services to identify contributions towards in-year saving and the Medium-Term Financial Strategy 2026/27.	Innovative and Cost-Effective Services	Initial report on options to save a minimum of £300,000 by summer 2025, to feed into the budget setting process for 2026/27.	Head of Finance	Finance, Waste and Technical Services	✓	Completed.
13.6	Update the Treasury Management and Investment Strategy, aligning it to the Council's ambitions for property and regeneration investment.	Innovative and Cost-Effective Services	Updated Strategy for recommendation by Audit Committee in January 2026 and adoption by Council in February 2026.	Head of Finance / Principal Accountant	Finance, Waste and Technical Services	☺	Work underway.
13.7	Implement Second Homes Premium.	Innovative and Cost-Effective Services	Premium to be included in annual Council Tax bills (as appropriate) from 1 April 2025.	Benefits and Welfare Manager	Finance, Waste and Technical Services	✓	Implemented.
13.8	Review earmarked reserves with a view to free up funding to assist with delivery of priority capital projects.	Innovative and Cost-Effective Services	Officer review to be undertaken by October 2025 with report to Cabinet by November 2025.	Head of Finance / Principal Accountant	Finance, Waste and Technical Services	☺	Work underway to meet target date.
13.9	Implement Integra Centros Financial ledger system in order to improve efficiency and effectiveness of transactions and reporting.	Innovative and Cost-Effective Services	Implementation of full digital signatures and improved budgetary control reporting by March 2026.	Head of Finance / Principal Accountant	Finance, Waste and Technical Services	☺	Work underway to meet target date.
13.10	Strengthen Annual Governance Statement (AGS).	Innovative and Cost-Effective Services	Review Service Assurance Statements which are completed by Statutory Officers and Directors to support the 2024/25 financial statements and the Annual Governance Statement. Annual Governance Statement signed off by Chief Executive and Leader of the Council by May 2025. Annual Governance Statement agreed by Audit Committee by July 2025.	Head of Finance/ Principal Accountant	Finance, Waste and Technical Services	✓	AGS signed in May 2025 and agreed by Audit Committee in July 2025.
13.11	Undertake an independent Planning Advisory Service Review and agree Action Plan for improvement.	Innovative and Cost-Effective Services	Complete independent review by September 2025. Action Plan considered by Housing and Planning Scrutiny Select Committee by October 2025. Action Plan agreed by Cabinet by December 2025.	Head of Planning	Planning	☺	Review completed, with action plan scheduled to go to the next Scrutiny Select Committee.

Ref	Description of activity	Priority Action(s)	Milestones	Lead Officer	Cabinet Member	RAG Rating	Commentary
			Agreed action plan fully delivered by March 2026.				
13.12	Implement a new planning fee structure aligned to expected secondary legislation.	Innovative and Cost-Effective Services	New fee structure considered by Planning & Housing Scrutiny Select Committee by December2025. New fee structure agreed by Cabinet by February 2026.	Head of Planning	Planning		Secondary legislation has not yet been passed by the Government and as such there will be a delay to the programme timelines until such time as the Government lay the required legislation.
13.13	Consolidate Council's accommodation at Kings Hill.	Innovative and Cost-Effective Services	Report tender outcome to Members and award contract for work to Gibson Building East in June 2025. Relocate staff from Gibson Building East to Gibson Building West in June/July 2025. Members to consider Gibson West future by June 2025. Reduction of at least £200,000 in annual operating costs by end of March 2026.	Head of Administration and Property Services	Housing, Environment and Economy		Tender outcome reported to Members on 03 June 2025. Staff relocated to Gibson West in July 2025. Cabinet approved the principle of disposing of Gibson West on 03 June 2025.
13.14	Review of Executive Scrutiny Protocol and Associated Governance Arrangements.	Innovative and Cost-Effective Services	Review presented to Cabinet by September 2025.	Director of Central Services	Executive Leader		Considered by Overview and Scrutiny in September 2025 and going to Cabinet in October 2025.
13.15	Review of Workforce Strategy to ensure the organisation continues to evolve to deliver high quality services.	Innovative and Cost-Effective Services	Revised strategy, including a new Workforce Monitoring Statement, to be approved by General Purposes Committee by September 2025.	Head of Human Resources and Development	Executive Leader		Strategy approved in May 2025.
13.16	Implementation of Member Development Strategy to promote a positive and inclusive culture of learning, development and continual improvement.	Innovative and Cost-Effective Services	Undertake Member Survey to identify development needs by end of June 2025. Strategy to be approved by General Purposes Committee in October 2025.	Head of Human Resources and Development	Executive Leader		Report going to General Purposes Committee (GPC) in October 2025 with a view to undertaking All Member Survey and reporting back to GPC in January 2026.
13.17	Deliver new external litter enforcement contract that helps to reduce Anti-Social Behaviour and protect our environment.	Innovative and Cost-Effective Services	New contract to commence in April 2025.	Street Scene Manager	Finance, Waste and Technical Services		Completed – contract commenced.
13.18	Investigate and trial new technologies to improve our car parks and improve the experience of our customers.	Innovative and Cost-Effective Services	Report on the potential of parking machines accepting contactless payments considered by Communities and Environment Select Committee in May 2025 and by Cabinet in July 2025. Automatic Number Plate Recognition introduced and operational at 2 car parks by March 2026.	Head of Technical Services / Parking Manager	Finance, Waste and Technical Services		Scheme slipped to Q3 due to staff resources. Intention to progress on a trial basis in selected car parks.

Ref	Description of activity	Priority Action(s)	Milestones	Lead Officer	Cabinet Member	RAG Rating	Commentary
13.19	Implement the requirements of the new Procurement Act, and subsequently review the Council's financial procedure rules and contract procedure rules contained within the constitution.	Innovative and Cost-Effective Services	Contracts tendered in accordance with new Procurement Act by April 2025. Updated financial rules and contract procedure rules approved by Council by March 2026.	Director of Street Scene, Leisure and Technical Services	Finance, Waste and Technical Services		Training given to staff and new procedures introduced,
13.20	Make it easier for customers to renew their garden waste subscription.	Innovative and Cost-Effective Services	Repeat payment option introduced for subscribers by March 2026.	Chief Financial Services Officer	Finance, Waste and Technical Services		On track for March 2026.
13.21	Identify and implement clear plan to resolve outstanding matters associated with the current Agile Programme	Innovative and Cost-Effective Services	The following teams upgraded to the new system by: Environmental Health by Summer 2025 Housing Services by Summer 2025 Licensing by Summer 2025	Director of Planning, Housing and Environmental Health	Finance, Waste and Technical Services		The Agile implementation has been replaced by the 'return to IDOX' project, which means that these services will remain on the IDOX Uniform platform, which is subject to a series of technical upgrades over summer 2025. Following these, training will be provided to staff on new features.
14.1	Launch an enhanced Community Enforcement Team.	Available Services and Advice	Funding contributions agreed with partner organisations and external funders by April 2025. New team up and running, with Communications Plan in place to raise awareness amongst our communities in April 2025.	Safer and Stronger Communities Manager	Community Services	✓	Funding contributions agreed in April 2025 with new team starting on 21 May 2025.
14.2	Campaign to increase uptake of E-billing and promote the Citizen Access service for Council Tax.	Available Services and Advice	Complete delivery of the campaign by December 2025 in order to impact on the 2026/27 billing programme.	Benefits and Welfare Manager	Finance, Waste and Technical Services		Social media campaign underway.
14.3	Implement key projects as set out in the IT & Digital Strategy 2023-27 roadmap.	Available Services and Advice	Migration of all internal and external eForms from an EBASE to JADU platform and decommission all relevant systems infrastructure by Spring 2025. Adoption of corporate enterprise document management solution including digitization of all paper records across all services within the council by March 2026. Migration of all shared drives across the authority to SharePoint, including training for all staff by March 2026.	Head of IT	Finance, Waste and Technical Services		Migration of eForms completed in Spring 2025.
14.4	Review National Cyber Security Centre's Cyber Assessment Framework (CAF) with a view to working towards compliance.	Available Services and Advice	Implement recommendations made through the CAF and complete the assessment to ensure compliance by December 2025.	Head of IT	Finance, Waste and Technical Services		Work underway to meet target date.

Ref	Description of activity	Priority Action(s)	Milestones	Lead Officer	Cabinet Member	RAG Rating	Commentary
14.5	Complete the Integration of Services into the Contact Centre to improve customer experience.	Available Services and Advice	Transfer of Waste Services in Spring 2025. Transfer of Planning by Autumn 2025.	Tonbridge Castle, Events and Customer Services Manager	Community Services		Waste Services transferred. Integration of Planning Services now likely to be in 2026/27.
14.6	Deliver effective and efficient County Council Elections for our residents	Available Services and Advice	County Council elections delivered successfully in May 2025.	Head of Electoral Services	Executive Leader	✓	Completed May 2025.
15.1	Distribute 2025/26 Household Support Fund support to our most vulnerable residents.	Promoting Well-Being	100% of funding support provided in accordance with the funding criteria by March 2026.	Benefits and Welfare Manager	Finance, Waste and Technical Services		
15.2	Produce new Health Action Team (HAT) Action Plan for the One You Service to deliver health & wellbeing impact across the borough.	Promoting Well-Being	Health Action Team Action Plan approved by Cabinet by June 2025. Implementation of Action Plan from June 2025 onwards, including completion of two key actions from each of the three priorities by March 2026.	One You Team Leader	Housing, Environment and Economy		Report to Communities and Environment Scrutiny Select Committee in September 2025 introduced the priorities of the Health Action Team.
16.1	Work towards securing a Silver Award in the Armed Forces Employer Recognition Scheme to raise awareness of the needs of the Armed Forces Community.	Supporting Residents	Granting Royal British Legion Industries Freedom of the Borough at a ceremony in May 2025. Application approved by Cabinet and submitted to Government in March 2026.	Corporate Policy and Communities Manager	Community Services	✓	RBLI granted Freedom of the Borough in May 2025. Application submitted in May 2025 and subsequently approved.
16.2	Deliver a Community Awards Scheme to celebrate individuals and groups making a positive impact and recognising outstanding dedication and service in the borough.	Supporting Residents	Scheme launched in June 2025. Awards presentations to be held by the Mayor by December 2025.	Corporate Policy and Communities Manager	Community Services		Scheme is currently open with a deadline for submission of 10 October 2025. The Awards Ceremony will take place in November 2025.
16.3	In recognition of changing demographics in the borough and to respond effectively to local need, develop and deliver equalities and diversity training for all staff, identifying those posts that require enhanced training.	Supporting Residents	Training plan reported to Cabinet by October 2025. Training delivered to all staff by March 2026.	Corporate Policy and Communities Manager	Community Services		Report to Cabinet on 14 October 2025 and on track for delivery by end of the financial year.

Ref	Description of activity	Priority Action(s)	Milestones	Lead Officer	Cabinet Member	RAG Rating	Commentary
16.4	Improve Council's Safeguarding arrangements and performance.	Supporting Residents	New training plan approved by Cabinet in October 2025, with training delivered to all staff and Members by March 2026. New enhanced safeguarding webpage with links to support agencies and safeguarding advice by March 2026.	Corporate Policy and Communities Manager	Community Services		Training plan scheduled to go to Cabinet on 14 October 2025. Intranet improvements completed, and TMBC website improvements planned for end of the financial year.

Efficient and Effective Council – Performance Targets:

Ref	Indicator	Description	Q1	Q2	Q3	Q4	Target 2025/26	Trend	Status	Commentary	Benchmarking	Lead Officer	Cabinet Member
040	Food Safety Inspections	% of due food safety inspections undertaken (Risk Category A-E).	93%	**93%**			**99%**	↔				Food and Safety Manager	Housing, Environment and Economy
041	One You Service	The number of residents benefiting from the support of the 'One You' Service (cumulative)	209	**353**			**750**	↔				One You Team Leader	Housing, Environment and Economy
042	Safeguarding	The number of priority actions arising from the independent safeguarding audit remaining unresolved for more than 6 months.	0	**0**			**0**	↔		No priority actions arising.		Corporate Policy Communities Manager	Community Services
043	Anti-Social Behaviour (ASB) (cumulative)	Total number of ASB cases in the borough that are reported to the Council.	127	**233**			**510**	↑		On track to meet target.		Safer and Stronger Communities Manager	Community Services
044	Victim-Based Crime	Total number of reported Victim-based crimes in the borough.	**1,667**	N/A			**7,200**	↑		Q2 figures awaited.		Safer and Stronger Communities Manager	Community Services
045	My Account registrations (cumulative)	The total number of residents with a My Account.	48,988	**52,343**			**47,000**	↑		Continuing strong growth ahead of target.		Head of Communication	Community Services
046	My TMBC app downloads (cumulative)	The number of app downloads over the course of a year.	627	**992**			**1,500**	↑		On track for end of year target.		Head of Communication	Community Services
047	Public engagement with news from TMBC (cum.)	The number of clicks on social media content over the course of a year.	4,593	**20,624**			**22,000**	↑		Large uptick in social media activity and marketing from Tonbridge Castle and events campaigns		Head of Communication	Community Services

Ref	Indicator	Description	Q1	Q2	Q3	Q4	Target 2025/26	Trend	Status	Commentary	Benchmarking	Lead Officer	Cabinet Member
048	Staff engagement	The proportion of staff who feel positive about working at the Council.	N/A	N/A			**85%**	↔		Staff survey timing to be confirmed.		Head of Communication	-
049	Vacant Posts (FTE)	Number of positions within the council that are currently vacant.	12	**12**			**7**	↔				Head of Human Resources and Development	-
050	Sickness Absence – short term	Average number of working days per employee across the organisation lost to short term sickness absence.	3.23	**2.7**			**2.7**	↑			5.7 (KCC); 2.9 (MBC) in 2023	Head of Human Resources and Development	-
051	Gender Pay Gap - Mean	The difference between the mean pay of men and women within the council.	22.3%	**22.3%**			**18%**	↔			-1.4% (SDC) 3% (MBC) 9.7% (KCC) 11.2% (TWBC) in 2024/25	Head of Human Resources and Development	-
052	Contact Centre – Handled Rate	% of calls answered in the Contact Centre against those presented.	84%	**78%**			**94%**	↓		Service impacted by external system problem, which is now resolved, along with staff turnover and long-term sickness.		Tonbridge Castle, Events and Customer Services Manager	Community Services
053	Contact Centre - Emails	% of emails responded to within 24 hours.	100%	**100%**			**100%**	↔				Tonbridge Castle, Events and Customer Services Manager	Community Services
054	Contact Centre - Webchat	% of webchats handled by the Contact Centre.	70%	**66%**			**99%**	↓		Impacted by staff turnover and long-term sickness within the team.		Tonbridge Castle, Events and Customer Services Manager	Community Services
055	Licensing	Fees generated from the processing of premises licenses under the Licensing Act 2003.	**£18,222**	N/A			**£85,000**	↔		Q2 figures awaited.		Licensing Inspector	Community Services
056	Council Tax	Percentage calculated as a cumulative year-to-date figure, from the total council tax payments received compared to the total amounts payable in that year.	27.3%	**55.1%**			**98.1%**	↔			98.0% (SDC) 97.5% (TWBC) 96.7% (MBC) in 2023/24	Benefits and Welfare Manager	Finance, Waste and Technical Services
057	Non-Domestic (Business) Rates	Percentage calculated as a cumulative year-to-date figure, from the total business rates payments received compared to the total amounts payable in that year.	31.2%	**57.5%**			**99.4%**	↑			98.7% (TWBC) 98.4% (MBC) 97.3% (SDC) in 2023/24	Benefits and Welfare Manager	Finance, Waste and Technical Services
058	Salary Monitoring Data	Variation to budget approved by Council in February 2025 and 2026 including the agreed management savings targets.	£63,250 below	**£114,300 below**			**£0**	↑				Head of Finance	Finance, Waste and Technical Services

Ref	Indicator	Description	Q1	Q2	Q3	Q4	Target 2025/26	Trend	Status	Commentary	Benchmarking	Lead Officer	Cabinet Member
059	Income Monitoring Data	Variation to budget approved by Council in February 2025 and 2026.	£64,673 below	**£36,442 above**			**£0**	↑				Head of Finance	Finance, Waste and Technical Services
060	Determination of Housing Benefit claims	Number of days to accurately determine new Housing Benefit claims and changes to existing claims.	28 and 6	**29 and 7**			**26 and 5**	↓				Benefits and Welfare Manager	Finance, Waste and Technical Services
061	Determination of Council Tax Reduction Scheme claims	Number of days to accurately determine new Council Tax Reduction Scheme claims (median) and changes to existing claims.	19 and 2	**33 and 2**			**30 and 2**	↓				Benefits and Welfare Manager	Finance, Waste and Technical Services
062	Prompt payment of invoices	The percentage of invoices paid with the **30**-day deadline.	99.6%	**99.8%**			**99%**	↔		Prompt payment stats for July - Sept 25 confirmed target achieved.	99.6% of invoices paid in 30 days during 2024/25 so trend is neutral.	Exchequer Services and Systems Manager	Finance, Waste and Technical Services

This page is intentionally left blank

A verbal update will be provided.

This page is intentionally left blank

A verbal update will be provided.

This page is intentionally left blank

Executive Decisions Record - September 2025

Decision Number	Title	Cabinet Member	Date of Decision	Date Published	Call-in period ends	Called in	Scrutiny Committee Consideration	Referred back to Cabinet	Referred back to Council	Council referred to Cabinet	Date Decision Effective
D250098CAB	Riverside Route Lighting Project, Tonbridge	Cabinet	02.09.25	05.09.25	12.09.25						13.09.25
D250099CAB	Local Nature Recovery Strategy - Pre-publication review period										
D250100CAB	Budgetary Control and Savings Update - July 2025										
D250101CAB	Sports Facilities Evidence										
D250102CAB	Risk Management										
D250103CAB	Annual Senior Information Risk Owner 2025/26										
D250104CAB	Bluebell Hill TA - Tenders										
D250105CAB	Larkfield Leisure Centre - Wet Change Refurbishment										
D250106CAB	Tonbridge Town Centre Programme Board - Minutes and Recommendations										
D250107MEM	Lease of Land to Tonbridge Model Engineering Society	Housing, Environment and Economy	15.09.25	15.09.25	22.09.25						23.09.25
D250108MEM	Write off of Unrecoverable Debts over £5,000.00	Finance, Waste and Technical Services	26.09.25	26.09.25	03.10.25						04.10.25

Decision pending	Call in period	Key Decision	Private	Urgent
	Subject to call in			

URG - outside of budget and policy framework

*Due to Bank Holiday

Number of monthly call-ins:	0
Number of call-ins for year:	0

Executive Decisions Record - October 2025

Decision Number	Title	Cabinet Member	Date of Decision	Date Published	Call-in period ends	Called in	Scrutiny Committee Consideration	Referred back to Cabinet	Referred back to Council	Council referred to Cabinet	Date Decision Effective
D250109CAB	Tonbridge Town Centre Masterplan Framework Adoption/Delivery Strategy	Cabinet	14.10.25	16.10.25	23.10.25						24.10.25
D250110CAB	UKSPF Community Development Grant Scheme										
D250111CAB	Safeguarding and Equalities and Diversity - Staff Training										
D2500112CAB	Angel Leisure Centre - Replacement Project										
D250113CAB	Annual Service Delivery Plan 2025/26 - Quarter 1										
D250114CAB	Executive/Scrutiny Protocol										
D250115CAB	Tonbridge Town Centre Programme Board - Recommendations										
D250116MEM	Proceed with the introduction of Parking Charges in Aylesford East and West carp parks	Finance, Waste and Technical Services	15.10.25	16.10.25	23.10.25						24.10.25
D2500117CAB	Local Plan Regulation 18 Consultation	Cabinet	29.10.25	31.10.25	7.11.25						8.11.25

Decision pending	Call in period	Key Decision	Private	Urgent
	Subject to call in			

URG - outside of budget and policy framework

*Due to Bank Holiday

Number of monthly call-ins:	**0**
Number of call-ins for year:	**0**

TONBRIDGE AND MALLING BOROUGH COUNCIL
NOTICE OF FORTHCOMING KEY DECISIONS

In accordance with the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, at least 28 days before a key decision is expected to be taken a Notice of Forthcoming Key Decisions will be published. A 'key decision' is an executive decision which is likely either

(a) to result in the local authority incurring expenditure which is, or the making of savings which are, significant having regard to the local authority's budget for the service or functions to which the decision relates.

'Significant' when applied to expenditure or savings shall mean a sum in excess of £100,000 or such other sum as may be specified in any enactment or other statutory provision.

<u>or</u>

(b) to be significant in terms of its effects on communities living or working in an area comprising two or more wards in the area of the local authority.

The Notice of Forthcoming Key Decisions sets out:

(a) the matter in respect of which a key decision is to be made;

(b) details of the decision taker and the date on which the key decision will be made;

(c) a list of documents to be submitted to the decision taker for consideration in relation to the matter;

(d) the address from which, subject to any prohibition or restriction on their disclosure, copies of or extracts from any document listed is available and the procedure for requesting details.

All key decisions will be made by the Cabinet on the dates specified unless otherwise stated*. The agenda and documents to be submitted to the Cabinet (unless they contain exempt information) will be available for inspection at the Council Offices and on the website 5 clear working days before the meeting. Copies or extracts are available from committee.services@tmbc.gov.uk or Democratic Services, Tonbridge & Malling Borough Council, Gibson Building, Gibson Drive, Kings Hill, West Malling ME19 4LZ.

This document also gives notice of the Council's intention to hold a private meeting (or part thereof) of the Cabinet. It indicates any items where it is likely that the public will be excluded because public discussion would disclose confidential or exempt information and the reasons in each case. Any representations against the intention to hold a private meeting may be made to committee.services@tmbc.gov.uk or Committee Services, Tonbridge & Malling Borough Council, Gibson Building, Gibson Drive, Kings Hill, West Malling ME19 4LZ.

Members of the Cabinet and their areas of responsibility:

Councillor Matt Boughton (Leader)
Councillor Robin Betts (Housing, Environment and Economy)
Councillor Martin Coffin (Deputy Leader; and Finance, Waste and Technical Services)
Councillor Des Keers (Community Services)
Councillor Adem Mehmet (Infrastructure and Tonbridge Regeneration)
Councillor Mike Taylor (Planning)

(***Note: This Notice is subject to change as the reporting/governance timetable may change and it may become necessary to defer decisions until the next meeting of Cabinet**)

NOTICE OF FORTHCOMING KEY DECISIONS: NOVEMBER TO FEBRUARY 2025/26

Description of Decision	Date of Cabinet	Who is to be consulted	Contact Officer	Documents to be submitted to Cabinet	Public or Private (reason if Private)
Local Plan Regulation 18B Consultation	Between 14 Oct 2025 and 31 Dec 2025	Internal consultation via Housing and Planning Scrutiny Select Committee and Cabinet as detailed in the reports to be considered by Members	Head of Planning	Officer report	Public
Planning Advisory Service Review Action Plan	Between 14 Oct 2025 and 30 Jan 2026	Internal consultation via Housing and Planning Scrutiny Select Committee and Cabinet as detailed in the reports to be considered by Members	Head of Planning	Officer report	Public
Decisions relating to the Government Programme of Devolution and Local Government Re-organisation (if required)	Between 14 Oct 2025 and 31 Dec 2025	Internal consultation via Cabinet as detailed in the reports to be considered by Members.	Chief Executive	Officer report	Public

Description of Decision	Date of Cabinet	Who is to be consulted	Contact Officer	Documents to be submitted to Cabinet	Public or Private (reason if Private)
Review of Fees and Charges 2025/26 - Communities and Environment	Between 3 Nov 2025 and 30 Jan 2026	Internal consultation via Communities and Environment Scrutiny Select Committee and Cabinet as detailed in the reports to be considered by Members	Director of Street Scene, Leisure and Technical Services	Officer report	Public
Review of Fees and Charges - Finance, Property and Regeneration	Between 3 Nov 2025 and 30 Jan 2026	Internal consultation via Finance, Regeneration and Property Scrutiny Select Committee and Cabinet as detailed in the reports to be considered by Members	Head of Finance and Section 151 Officer	Officer report	Public
Review of Fees and Charges - Housing and Planning	Between 3 Nov 2025 and 30 Jan 2026	Internal consultation via Housing and Planning Scrutiny Select Committee and Cabinet as detailed in the reports to be considered by Members	Director of Planning, Housing and Environmental Health	Officer report	Public

Description of Decision	Date of Cabinet	Who is to be consulted	Contact Officer	Documents to be submitted to Cabinet	Public or Private (reason if Private)
Lease Proposal for Temporary Accommodation Properties in Tonbridge	Between 3 Nov 2025 and 30 Jan 2026	Internal consultation via Cabinet as detailed in the reports to be considered by Members.	Head of Administrative and Property Services	Officer report	Fully exempt Information relating to the financial or business affairs of any particular person (including the authority holding that information)
Lease Arrangements at Tonbridge Farm Sportsground	Between 3 Nov 2025 and 31 Dec 2025	Internal consultation via Cabinet as detailed in the reports to be considered by Members.	Head of Administrative and Property Services	Officer report	Fully exempt Information relating to the financial or business affairs of any particular person (including the authority holding that information)

Description of Decision	Date of Cabinet	Who is to be consulted	Contact Officer	Documents to be submitted to Cabinet	Public or Private (reason if Private)
Tonbridge Town Centre Programme Board - Recommendations (If any)	Between 3 Nov 2025 and 27 Feb 2026	Internal consultation via Cabinet as detailed in the reports to be considered by Members.	Dean Radmore	Officer report	Fully exempt Information relating to the financial or business affairs of any particular person (including the authority holding that information)

Contact: committee.services@tmbc.gov.uk

Published: 14 October 2025

OVERVIEW AND SCRUTINY SELECT COMMITTEE – UPCOMING MATTERS

2025-26

C=Council; CAB = Cabinet; DEL = Delegated to Committee; INFO = matters for information. Cabinet are responsible for ALL Key Decisions (KD). Some Non-Key Decisions (NKD) can be taken by Cabinet Members outside of the meeting.

DECISION (TITLE)	DESCRIPTION	C/CAB/ DEL/INFO	KD/NKD	CAB MEMBER DN Y/N	PART 1 OR 2	MEETING DATE	OFFICER IN PERSON ATTENDANCE Y/N
Revenue Estimates 2026/27	Budget setting	C				22 January 2026	
Capital Plan Review 2025/26	Budget setting	C					
Annual Service Delivery Plan 2026/27	To set out key priorities for the upcoming year.	NKD					
Planning Application Delays	Subject to confirmation	Info					
Empty Homes Update (Requested by Committee on 26.6.25)	Introduction of Empty Homes Officer and update on work being undertaken	Info					
Matters Arising from Services in between cycles: To be identified							
Record of Executive Decisions	Standing item	Info					
Work Programme	Standing item	Info					

Agenda Item 13

DECISION (TITLE)	DESCRIPTION	C/CAB/ DEL/INFO	KD/NKD	CAB MEMBER DN Y/N	PART 1 OR 2	MEETING DATE	OFFICER IN PERSON ATTENDANCE Y/N
KCC Health Overview & Scrutiny – Presentation	TBC	Info			1	23 April 2026	
Annual Service Delivery Plan	Q3	CAB	NKD	N	1		
S106 underspend							
Matters Arising from Services in between cycles: To be identified							
Record of Executive Decisions	Standing item	Info					
Work Programme	Standing item	Info					
Future items to be scheduled for scrutiny: Integrated Care Board and GP provision as requested by OS of 3.4.25 (further detail required)							

Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

This page is intentionally left blank

The Chairman to move that the press and public be excluded from the remainder of the meeting during consideration of any items the publication of which would disclose exempt information.

ANY REPORTS APPEARING AFTER THIS PAGE CONTAIN EXEMPT INFORMATION

This page is intentionally left blank

Agenda Item 16

Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

This page is intentionally left blank