



Ministry of Housing,
Communities &
Local Government

15 May 2025

LOCAL GOVERNMENT REORGANISATION
INTERIM PLAN FEEDBACK: KENT AND MEDWAY

To the Chief Executives of:

Ashford Borough Council
Canterbury City Council
Dartford Borough Council
Dover District Council
Folkestone 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

Overview:

Thank you for submitting your interim plans. The amount of work from all councils is clear to see across the range of options being considered. For the final proposal(s), each council can submit a single proposal for which there must be a clear single option and geography and, as set out in the guidance, we expect this to be for the area as a whole; that is, the whole of the area to which the 5 February invitation was issued, not partial coverage.

Our aim for the feedback on interim plans is to support areas to develop final proposal(s). This stage is not a decision-making point, and our feedback does not seek to approve or reject any option being considered.

The feedback provided relates to:

- The Kent Interim Plan for Local Government Reorganisation, submitted by all Kent councils
- The Supplementary Submission from Kent Councils on Local Government Reorganisation

- The letter submitted by Medway Council
- The letter submitted by Maidstone Borough Council, Sevenoaks District Council, Tonbridge & Malling Borough Council and Tunbridge Wells Borough Council
- The letter submitted by Kent County Council
- The letter submitted by Dartford Borough Council

We have provided feedback on behalf of central government. It takes the form of:

1. A summary of the main feedback points.
2. Our response to the specific barriers and challenges raised in your plans.
3. An annex with more detailed feedback against each of the interim plan asks.

We reference the guidance criteria included in the invitation letter throughout, a copy can be found at [Letter: Kent and Medway - GOV.UK](#). Our central message is to build on your initial work and ensure that the final proposal(s) address the criteria and are supported by data and evidence. We recommend that final proposal(s) should use the same assumptions and data sets or be clear where and why there is a difference.

We welcome the work that has been undertaken across proposals to develop local government reorganisation plans for Kent and Medway. This feedback does not seek to approve or discount any option or proposal, but provide some feedback designed to assist in the development of final proposal(s). We will assess final proposal(s) against the guidance criteria provided in the invitation letter and have tailored this feedback to identify where additional information may be helpful in enabling that assessment. Please note that this feedback is not exhaustive and should not preclude the inclusion of additional materials or evidence in the final proposal(s).

In addition, your named area lead, Nicola Croden, will be able to provide support and help address any further questions or queries.

Summary of Feedback:

We have summarised the key elements of the feedback below, with further detail provided in the annex.

1. We note that plans are at an early stage and further analysis is planned in the run-up to submitting the final proposal(s). **Further detail, and evidence, on the outcomes that are expected to be achieved for the whole area of any preferred model would be welcomed.**
2. We recognise the geographically important position of Kent, and of the Short Straits crossings, the Channel Tunnel, and the inland border facilities. We recognise also that their presence will generate unique considerations for local government reorganisation within the Kent and Medway area. **Given the strategic importance of the Kent ports, we would welcome evidence on any service delivery impacts of splitting transport functions as far as these relate to highways/resilience functions around the UK border, and any options that would ensure non-interrupted delivery of these services.**

We further welcome the intention to consider the impact of local government reorganisation on local public service delivery, including pressures arising from Kent's position as a major point of entry into the UK. **We recommend that your final proposal(s) provide further detail on how new unitaries in the Kent and Medway area can continue to work together to respond as necessary.** We can facilitate further conversations on these issues with relevant departments during the development of your final proposal(s).

3. More generally, we recognise that you are considering a range of options for unitary Government, and we note that these are interim plans, and that you intend to further assess, refine, and consider a range of options before settling on a preferred choice. **For the final proposal(s), each council can submit a single proposal for which there must be a clear single option and geography and, as set out in the guidance, we expect this to be for the area as a whole; that is, the whole of the area to which the 5 February invitation was issued, not partial coverage.** Proposal(s) should be supported by robust evidence against the criteria in the 5 February invitation letter and detail the geographical boundaries for each proposed council area. As the Invitation sets out, boundary changes are possible, but "existing district areas should be considered the building blocks for proposals, but where there is a strong justification more complex boundary changes will be considered." The final proposal must specify the area for any new unitary council(s). If a boundary change is part of your final proposal, then you should be clear on the boundary proposed, which could be identified by a parish or ward boundary or, if creating new boundaries, by attaching a map.

Proposals should be developed having regard to the statutory guidance which sets out the criteria against which proposals will be assessed (including that listed above).

If a decision is taken to implement a proposal, boundary change can be achieved alongside structural change. Alternatively, you could make a proposal for unitary local government using existing district building blocks and consider requesting a Principal Area Boundary Review (PABR) later. Such reviews have been used for minor amendments to a boundary where both councils have requested a review – such as the recent Sheffield/Barnsley boundary adjustment for a new housing estate. PABRs are the responsibility of the Local Government Boundary Commission for England who will consider such requests on a case-by-case basis.

4. In some of the options, you are considering populations that would be above or below 500,000. As set out in the Statutory Invitation guidance and in the English Devolution White Paper, we outlined a population size of 500,000 or more. This is a guiding principle, not a hard target – we understand that there should be flexibility, especially given our ambition to build out devolution and take account

of housing growth, alongside local government reorganisation. **All proposals, whether they are at the guided level, above it, or below it, should set out the rationale for the proposed approach clearly.**

5. The criteria ask that 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 public safety (see criterion 3). The recognition of the risk of disaggregation of services is welcome. **For all options where there is disaggregation, further detail will be helpful on how the different options might impact on these services and how risks can be mitigated.**
6. We welcome the steps you have taken to come together to prepare proposals as per criterion 4.
 - a. **Effective collaboration between all councils across the invitation area will be crucial; we would encourage you to continue to build strong relationships and agree ways of working, including around effective data sharing. This will support the development of a robust shared evidence base to underpin final proposal(s).**
 - b. **It would be helpful if final proposal(s) use the same assumptions and data sets or be clear where and why there is a difference.**
 - c. **It would be helpful if your final proposal(s) set out how the data and evidence support all the outcomes you have included, and how well they meet the assessment criteria in the invitation letter.**
 - d. **You may wish to consider an options appraisal that will help demonstrate why your proposed approach in the round best meets the assessment criteria in the invitation letter compared to any alternatives.**
7. We welcome the stated ambition to seize the opportunities of devolution for residents and businesses. It would be helpful to outline how each option would interact with a Strategic Authority and best benefit the local community, including meeting devolution statutory tests.

Response to the specific barriers and challenges raised

Please see below our response to the specific barriers and challenges that were raised in your interim plans:

1. Assurances over additional support for Kent and Medway, recognising its unique position as a major point of entry into the UK

You have asked for assurance that new unitary structures will receive the financial resources to manage pressures arising from the major points of entry located in your area, as well as support in considering how existing border functions may be transferred to new unitary authorities. As stated above, we

recognise that Short Straits crossings present unique and significant challenges to Kent and Medway. Your final proposal(s) should provide detail on how new unitary authorities would be able to meet these demands, and the financial implications of doing so. During the development of your final proposal(s), we can work with yourselves and relevant government departments to consider how infrastructure and statutory responsibilities will be transferred to new unitary authorities.

2. Resources for small boat entries and unaccompanied asylum-seeking children

You have noted the challenges resulting from the consequences of small boat crossings and unaccompanied asylum-seeking children (UASC). We note the pressures facing Kent and Medway councils in relation to UASC, and expect these to be detailed and assessed in any final proposal(s). As you will be aware, a High Court Judgement in 2023 confirmed that Kent County Council must accommodate all UASC who arrive in the area, until they can be transferred out via the National Transfer Scheme (NTS). We would welcome further details on how the NTS can continue to function smoothly alongside the new unitaries and further consideration of potential challenges, including reception facilities and other UASC-specific accommodation which will be split across new local authority boundaries, with the point of entry situated within a newly created, smaller unitary authority. During the development of your final proposal(s), we can work with yourselves and relevant government departments to consider how existing financial support can be continued across new local government structures.

3. Planning constraints

You have raised planning constraints within the Kent and Medway area and sought assurances that agreed geographies account for these constraints in relation to housing targets. We suggest that your final proposal(s) should take these constraints into account, ensuring that any new local authority geographies make sense in the context of planning delivery. We would welcome further discussions on the issues of viability, nutrient neutrality and housing delivery, as mentioned in your Interim Plan.

4. Management of legacy debt

You have requested a discussion regarding the management of legacy debt. It is the responsibility of councils to manage their budgets, and it is standard for councils to borrow and to hold debt, which they will do in the normal course of business. Local government reorganisation does not change this. We expect proposals to set out how they will meet criterion 2 under the Statutory Invitation, and we will consider the financial analysis and evidence provided in final proposals.

5. Cost and demand pressures

We note your concerns regarding the cost and demand pressures facing some Kent and Medway councils, and your request to discuss additional fiscal devolution. As set out in the summary of feedback, we note that many of the pressures and challenges encountered during local government reorganisation of Kent and Medway are unique. We expect these to be detailed and assessed in your final proposal(s), and we are willing to further discuss these issues throughout the development of any proposal(s). As per the criteria in the invitation letter we expect that your final proposal(s) will include unitaries of a sensible economic area.

6. Capacity funding

You have requested support from government to meet the upfront costs of proposal development. £7.6 million will be made available in the form of local government reorganisation proposal development contributions, to be split across the 21 invitation areas. Further information will be provided on this funding shortly.

In terms of transitional costs, as per the invitation letter, 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. We note the estimate of your transition costs and comment further on this in the table below.

7. In-flight funding geographies

We note the point about existing funding remaining in the areas to which it was allocated. We would welcome a greater understanding of how the original aims of any such funding (including where any specific areas have been targeted) can best be achieved through any new unitary authorities. We suggest meeting to discuss the matter in further detail.

8. Amalgamation of Housing Revenue Accounts

You have asked for advice on ensuring that the amalgamation of Housing Revenue Accounts (HRAs) will ensure that tenants across Kent are treated fairly. It is for councils to determine how best to manage their HRA. However we recognise the need to make appropriate arrangements, where one or more existing districts currently have HRAs or have relevant social housing assets, to establish new HRAs for the new councils as appropriate. We will address this with the councils and relevant MHCLG policy leads, as we go through the local government reorganisation process.

9. Mechanisms to support local representation and accountability

You have stated your aspiration that staff and elected officials of any new councils would be representative of Kent and Medway's diverse communities.

We agree that democratic representation for our places and communities is essential, as set out in criterion 4. You should consider in your final proposal(s) how these important issues can be addressed under new unitary structures locally and how local initiatives might fit with wider sector strategies around achieving elected members and a workforce that are representative of local communities.

10. Geography, representation and identity

You have asked that government consider the diversity of Kent and Medway's population in determining any unitary geographies, and to consider local identity as expressed by residents alongside financial viability. It is for Kent and Medway councils to develop proposals with appropriate geographies in accordance with the criteria set out in the invitation letter.

As set out in the Statutory Invitation guidance and in the English Devolution White Paper, we outlined a population size of 500,000 or more. This is a guiding principle, not a hard target – we understand that there should be flexibility, especially given our ambition to build out devolution and take account of housing growth, alongside local government reorganisation. All proposals, whether they are at the guided level, above it, or below it, should set out the rationale for the proposed approach clearly.

. We welcome the early view you have provided of councillor/elector ratios. Your final proposal(s) should set out the rationale for your preferred approach to community governance.

11. Transition of local planning authorities

You have asked to discuss the transition to new local plans. We remain committed to ensuring universal coverage of up-to-date local plans as quickly as possible, so strategic planning reform proposals should not be used as a reason to delay the preparation of local plans. The legal status of local plans is not impacted by local government reorganisation. Where reorganisation occurs, new unitary authorities are expected to promptly prepare a local plan covering the whole of their area. Until that new local plan is adopted, existing constituent local plans remain in force as part of the development plan for their area. New unitary authorities have the discretion to progress any emerging constituent local plans.

12. Alignment of delivery structures within the devolution context

We welcome your ambition to think proactively around the future opportunities for devolution in the Kent and Medway area. We share your ambition and are pleased that you are seeking to ensure Kent and Medway can start benefitting from devolved powers as soon as possible.

We cannot pre-judge the result or timelines of any future devolution discussions, but we will work with you to progress your ambitions where possible in due course.

13. Ongoing engagement – political and official

We note your request for continued dialogue with government officials as you work on your final proposal(s). Government is committed to supporting all invited councils equally while they develop proposal(s). Nicola Croden is your MHCLG point person and is ready to engage with the whole area on issues you wish to discuss further ahead of the deadline for final plans on 28 November 2025.

14. District/Borough boundary changes

You have asked about the Minister's willingness to consider options that significantly change several District/Borough boundaries. As the Invitation sets out, boundary changes are possible, but "existing district areas should be considered the building blocks for proposals, but where there is a strong justification more complex boundary changes will be considered."

The final proposal must specify the area for any new unitary council(s). If boundary change is part of your final proposal, then you should be clear on the boundary proposed, which could be identified by a parish or ward boundary, or if creating new boundaries by attaching a map.

Proposals should be developed having regard to the statutory guidance which sets out the criteria against which proposals will be assessed (including that listed above).

If a decision is taken to implement a proposal, boundary change can be achieved alongside structural change. Alternatively, you could make a proposal for unitary local government using existing district building blocks and consider requesting a Principal Area Boundary Review (PABR) later.

ANNEX: Detailed feedback on criteria for interim plan

Ask - Interim Plan Criteria	Feedback
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. Relevant criteria: 1c) 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 & 2a-f) Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks & 3a-c) Unitary structures must prioritise the delivery of high-quality and sustainable public services to citizens	We welcome your initial thinking on the options for local government reorganisation in Kent and Medway and recognise that this is subject to further work. We note the local context and challenges you have outlined and your intention to undertake further analysis, and this further detail and evidence, on the outcomes that are expected to be achieved of any preferred model, would be welcomed. For the final proposal(s), each council can submit a single proposal for which there must be a single clear option and geography and, as set out in the guidance, we expect this to be for the area as a whole; that is, the whole of the area to which the 5 February invitation was issued, not partial coverage. You may wish to consider an options appraisal against the criteria set out in the letter to provide a rationale for your eventual preferred model against alternatives. Where there are proposed boundary changes, the proposal should provide strong public services and financial sustainability-related justification for the change. Proposals should be for a sensible geography that will help to increase housing supply and meet local needs, including future housing growth plans. All proposals should set out the rationale for the proposed approach. Given the financial pressures you identify, it would be helpful to understand how efficiency savings have been considered alongside a sense of place and local identity. We recognise that the options outlined in the interim plan are subject to further development. In final proposal(s) it would be helpful to include a high-level financial assessment which covers transition costs, and overall forecast operating costs of the new unitary councils.

	We will assess your final proposal(s) against the criteria in the invitation letter. Referencing criteria 1 and 2, you may wish to consider the following bullets: • high-level breakdowns for where any efficiency savings will be made, with clarity of assumptions on how estimates have been reached and the data sources used, including differences in assumptions between proposals • information on the counterfactual against which efficiency savings are estimated, with values provided for current levels of spending • a clear statement of what assumptions have been made and if the impacts of inflation are taken into account • a summary covering sources of uncertainty or risks, with modelling, as well as predicted magnitude and impact of any unquantifiable costs or benefits • quantified impacts, where possible, on service provision, as well as wider impacts We recognise that financial assessments are subject to further work. Referencing criteria 1 and 2, the bullets below indicate where further information would be helpful across all options: • data and evidence to set out how your final proposal(s) would enable financially viable councils across the whole area, including identifying which option best delivers value for money for council taxpayers • further detail on potential finances of new unitaries, for example, funding, operational budgets, potential budget surpluses/shortfalls, total borrowing (General Fund), and debt servicing costs (interest and MRP); and what options may be available for rationalisation of potentially saleable assets • clarity on the underlying assumptions underpinning any modelling, e.g. assumptions of future funding, demographic growth and pressures, interest costs, Council Tax, savings earmarked in existing councils' MTFS • financial sustainability both through the period to the creation of new unitary councils as well as afterwards For proposals that would involve disaggregation of services, we would welcome further details on how services can be maintained where there is
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	fragmentation, such as social care, children's services, SEND, homelessness, and for wider public services including public safety. Under criterion 3c, you may wish to consider: • how each option would deliver high-quality and sustainable public services or efficiency saving opportunities • what are the potential impacts of disaggregating services • what would the different options mean for local services provision, for example: • do different options have a different impact on SEND services and distribution of funding and sufficiency planning to ensure children can access appropriate support, and how will services be maintained? • what is the impact on adult and children's care services? Is there a differential impact on the number of care users and infrastructure to support them among the different options? • what partnership options have you considered for joint working across the new unitaries for the delivery of social care services? • do different options have variable impacts as you transition to the new unitaries, and how will risks to safeguarding be managed? • do different options have variable impacts on schools, support and funding allocation, and sufficiency of places, and how will impacts on schools be managed? • what might be the impact on Highway services? • what are the implications for public health, including consideration of socio-demographic challenges and health inequalities within any new boundaries and their implications for current and future health service needs? What are the implications for how residents access services and service delivery for populations most at risk? We welcome the desire to maximise the opportunity for public service reform, and it would be helpful for
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	you to provide more details on your plans so we can explore how best to support your efforts. As criterion 2e states, and recognising that Medway Council has received Exceptional Financial Support, proposals must additionally demonstrate how reorganisation may contribute to putting local government in the area as a whole on a more sustainable footing, and any assumptions around what arrangements may be necessary to make new structures viable. As per criterion 2f, proposals should set out how debt can be managed locally, including as part of efficiencies possible through reorganisation. This could include appraisal of total borrowing and debt servicing costs within new structures (and assessment of affordability against funding/operational costs), and the potential for rationalisation of saleable assets. We would welcome further details on how the NTS can continue to function smoothly alongside the new unitaries and further consideration of potential challenges, including reception facilities and other UASC-specific accommodation which will be split across new local authority boundaries, with the point of entry situated within a newly created, smaller unitary authority.
Include indicative costs and arrangements in relation to any options including planning for future service transformation opportunities. Relevant 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	As per criterion 2, the final proposal(s) 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. • within this, it would be helpful to provide detailed analysis on expected transition and/or disaggregation costs and potential efficiencies of proposals. This could include clarity on methodology, assumptions, data used, what year these may apply and why these are appropriate • detail on the potential service transformation opportunities and invest-to-save projects from unitarisation across a range of services would also be helpful, e.g. consolidation of waste collection and disposal services, and whether

authorities in taking forward transformation and invest-to-save projects.	different options will provide different opportunities for back-office efficiency savings • where it has not been possible to monetise or quantify impacts, you may wish to provide an estimated magnitude and likelihood of impact • summarise any sources of risks, uncertainty and key dependencies related to the modelling and analysis • detail on the estimated financial sustainability of proposed reorganisation and how debt could be managed locally We note your comment that as the precise geographies of potential new unitary authorities are yet to be determined, it is difficult to model indicative costs and transformation opportunities. This information will be vital in the final proposals. We also note that reorganisation options in Kent and Medway would result in existing highways functions being split. In addition to further evidence on the costs, opportunities and impacts of any such arrangements, it would be helpful to provide further information on the indicative costs of interim and final proposals for how future Local Transport Authority and public transport powers would function. We welcome the joint work you have done to date and recommend that all options and proposal(s) should use the same assumptions and data sets or be clear where and why there is a difference (linked to criterion 1c).
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.	We welcome the commitment to ensure that new unitary structures must provide for effective democratic representation for residents. It would be helpful for you to provide assessments regarding councillor numbers, which we will share with the Local Government Boundary Commission for England. New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment. Additional details on how the community will be engaged and specifically how the governance, participation and local voice will be addressed to

Relevant criteria: 6) New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.	strengthen local engagement and democratic decision-making would be helpful. In your final proposal(s) we would welcome detail on your plans for neighbourhood-based governance, the impact on parish councils, and the role of formal neighbourhood partnerships and area committees.
Include early views on how new structures will support devolution ambitions. Relevant criteria: 5) New unitary structures must support devolution arrangements. 5b) Where no Combined Authority (CA) or Combined County Authority (CCA) is already established or agreed then the proposal should set out how it will help unlock devolution.	We note, share and support your ambition for devolution in Kent and Medway. Across all LGR proposal(s), looking towards a future Strategic Authority, it would be helpful to outline how each option would interact with a Strategic Authority and best benefit the local community, including meeting the criteria for sensible geography in the White Paper and devolution statutory tests. We cannot pre-judge the result or timelines of any future devolution discussions, but we will work with you to progress your ambitions where possible in due course.
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. Relevant criteria: 6a) Proposals will need to explain plans to make sure that communities are engaged. &	We welcome the engagement undertaken to date in alignment with criterion 6. We also welcome and encourage the intention for wider engagement during the development of your final proposal(s). It is for you to decide how best to engage locally in a meaningful and constructive way with residents, the voluntary sector, Neighbourhood Boards, local community groups and councils, public sector providers such as health, police and fire, and local businesses, to inform your final proposal(s). We welcome your engagement with the Kent Association of Local Councils (KALC) and would also advise that your town and parish councils and KALC are engaged as part of the ongoing development of your proposal(s).

6b) Where there are already arrangements in place it should be explained how these will enable strong community engagement.	As your proposals are likely to involve disaggregation of services, you may wish to engage in particular with those residents who may be affected. It would be helpful to see detail that demonstrates how local ideas and views have been incorporated into any final proposal(s).
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. Relevant 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.	It would be helpful to see indicative costs of preparing proposals and standing up an implementation team, and the details of any arrangements proposed to coordinate potential capacity funding across the area. £7.6 million will be made available in the form of local government reorganisation proposal development contributions, to be split across the 21 areas. Further information will be provided on this funding shortly. In terms of transitional costs, as per the invitation letter, 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. We note the financial challenges that many councils are facing. It would be helpful if detail on the councils' financial positions and further modelling is set out in detail in the final proposal(s).
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.	In line with criterion 4, we welcome and thank you for the joint working undertaken to date. Effective collaboration between all councils will be crucial; areas will need to build strong relationships and agree ways of working, including around effective data-sharing. This will enable you to develop a robust shared evidence base to underpin your final proposal(s) (see criterion 1c). We recommend that final proposal(s) should use the same assumptions and data sets or be clear where and why there is a difference.

Relevant criteria:

4a-c) 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.