



25th March 2026

Proposals for Local Government Reorganisation in Devon, Plymouth and Torbay

CONSULTATION RESPONSE FROM THE SOUTH HAMS SOCIETY

The South Hams Society interest.

For the last 65 years, the South Hams Society has been stimulating public interest and care for the beauty, history and character of the South Hams. We encourage high standards of planning and architecture that respect the character of the area. We aim to secure the protection and improvement of the landscape, features of historic interest and public amenity and to promote the conservation of the South Hams as a living, working environment. We take the South Devon Area of Outstanding Natural Beauty very seriously and work hard to increase people's knowledge and appreciation of our precious environment.

Addressed to:

Local Government Reorganisation Consultation Team Department for Levelling Up, Housing and Communities

Re: Consultation Response – Proposals for Local Government Reorganisation in Devon, Plymouth and Torbay

The South Hams Society welcomes the opportunity to comment on the Government's proposals for local government reorganisation across Devon, Plymouth and Torbay. Our submission reflects more than sixty years of work to protect the landscapes, communities and distinctiveness of the South Hams, and draws on our experience engaging with planning, environmental management, and local governance across the district.

When the South Hams Society was formed, the South Hams was recognised as a central area of South Devon to the moors. The District of South Hams created by the 1973 local government reorganisation

We recognise the Government's stated intention to improve efficiency, coherence and service delivery. However, our analysis raises significant concerns about the potential consequences for rural and coastal areas, particularly those within designated landscapes such as the South Devon AONB. These concerns relate to:

- the risk of democratic dilution within very large unitary structures
- the potential weakening of local planning responsiveness, especially in sensitive coastal and rural environments
- the absence of clear, independently verified financial modelling
- the implications for infrastructure, transport, and environmental stewardship

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- the need to safeguard the role and autonomy of parish and town councils
- the danger of centralising decision-making away from communities with distinct needs and identities

The South Hams is characterised by dispersed settlements, fragile infrastructure, high landscape sensitivity, and acute housing pressures. Any reorganisation must therefore be assessed not only on administrative efficiency but on its capacity to maintain strong, locally accountable decision-making that reflects these realities.

Our detailed response assessed not only on administrative efficiency but on its capacity to maintain strong, locally accountable informed decision making that reflects these realities, sets out the evidence behind these concerns and offers constructive recommendations to ensure that any future governance arrangements strengthen—rather than diminish—the voice of rural and coastal communities.

We urge the Department to ensure that:

- local identity and community representation remain central to any new structure
- planning and environmental responsibilities are not distanced from the places they affect
- parish and town councils are empowered, not marginalised
- the unique characteristics of designated landscapes are fully recognised in governance design
- financial and service-delivery claims are supported by transparent, robust evidence

We would welcome continued engagement as the proposals develop and remain committed to contributing constructively to discussions about the future of local government in Devon.

Yours faithfully,

Leslie Pengelly

South Hams Society (on behalf of the Trustees)

South Hams District - Historical Context.

The name "South Hams" is one of the most descriptive and ancient regional labels in England. **Unlike many modern administrative districts, its name wasn't invented by a committee; it grew out of the very shape of the land.**

It derives from the Old English word "hamm," which has a very specific geographical meaning:

- Enclosure or Meadow: It originally referred to a piece of land hemmed in by water or marsh, or a "water-meadow."
- The "Hems": In the context of South Devon, it refers to the land "hemmed in" by the natural boundaries of the Dartmoor granite massif to the north and the English Channel to the south.
- Sheltered Places: Some historians also link it to the Old English *hām* (home/homestead), but in Devon, the topographical "hamm" is the more accepted root for the rolling, enclosed valleys of the region.

You'll notice it is almost always called the South Hams (plural). This is because the region isn't one single valley, but a collection of "hams" or "sheltered combes" created by the many rivers flowing off Dartmoor:

- The Dart
- The Avon
- **The Erme**
- The Yealm

Each river creates its own "ham," and collectively, they form the "South Hams."

The name has been used for over a thousand years to distinguish the fertile, "deep-soil" lands of the south from the harsh, "thin-soil" heights of the moor.

Era	Significance
Saxon (8th-10th C)	The term <i>hamm</i> becomes common in Devon place-names (e.g., Georgeham, Abbotsham) to describe low-lying fertile lands.
Domesday Book (1086)	While not a single administrative unit then, the "Hams" were recorded as some of the most valuable agricultural lands in the Kingdom.
Tudor Period	Writers like William Camden began referring to the area south of Dartmoor as the "Hams" to describe its exceptional fertility—often called the "Garden of Devon."
1974	The South Hams District Council was formed, officially adopting the ancient geographic name for the modern administrative area.

Historically, being from the "South Hams" meant you lived in the "cider and cream" belt. Because it is south-facing and protected by the moor, it has a microclimate. This led to the historical nickname "**The South Hams of Devon**," implying a place of plenty, warmth, and enclosure—the exact opposite of the "wild" and "open" Dartmoor.

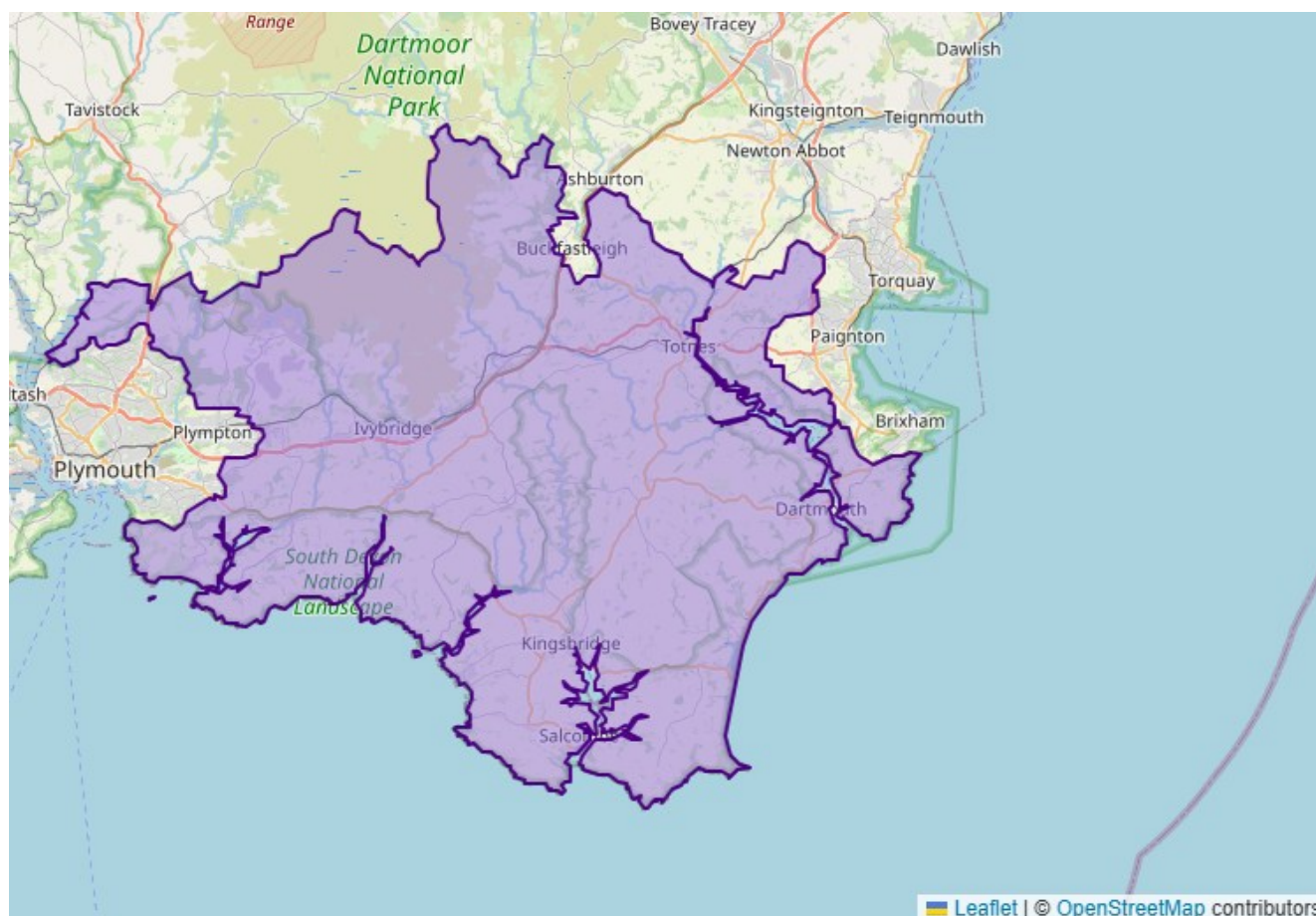
As the principal market town of the **South Hams**, Kingsbridge serves as the geographic and social heart of the region. It is situated at the head of a "ria" (a drowned river valley) known as the Kingsbridge Estuary, within the **South Devon National Landscape** (formerly Area of Outstanding Natural Beauty).

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South Hams District Boundary Map

This map shows the official boundary of the South Hams local authority district, based on the latest geographic data published by the Office for National Statistics (ONS). It provides a clear view of the district's extent and helps you understand how the area fits within the wider regional and national landscape.



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South Hams is divided into 20 wards

Allington & Strete, Bickleigh & Cornwood, Blackawton & Stoke Fleming, Charterlands, Dartington & Staverton, Dartmouth & East Dart, Ermington & Ugborough, Ivybridge East, Ivybridge West, Kingsbridge, Loddiswell & Aveton Gifford, Marldon & Littlehempston, Newton & Yealmpton, Salcombe & Thurlestone, South Brent, Stokenham, Totnes, Wembury & Brixton, West Dart & Woolwell

South Hams is fully parished with 61 civil parishes (unlike Torbay that abolished its parishes in 1968¹).

Ashprington, Aveton Gifford, Berry Pomeroy, Bickleigh, Bigbury, Blackawton, Brixton, Buckland-Tout-Saints, Charleton, Chivelstone, Churchstow, Cornwood, Cornworthy, Dartington, Dartmouth, Dean Prior, Diptford, Dittisham, East Allington, East Portlemouth, Ermington, Frogmore and Sherford, Halwell and Moreleigh, Harberton, Harford, Holbeton, Holne, Ivybridge, Kingsbridge, Kingston, Kingswear, Littlehempston, Loddiswell, Malborough, Marldon, Modbury, Newton and Noss, North Huish, Rattery, Ringmore, Salcombe, Shaugh Prior, Slapton, South Brent, South Huish, South Milton, South Pool, Sparkwell, Staverton, Stoke Fleming, Stoke Gabriel, Stokenham, Strete, Thurlestone, Totnes, Ugborough, Wembury, West Alvington, West Buckfastleigh, Woodleigh and Yealmpton.

¹ On 1 April 2007 a new civil parish of Brixham was created, with its council declaring the new parish to be a town and adopting the name Brixham Town Council.

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Landscape Legal Protections

The South Hams District Council (area 886.49 km²) is one of the most heavily designated rural districts in England.

The area of designated landscapes in the South Hams amounts to a total of 555.1 km², 62.6% of the SHDC area.

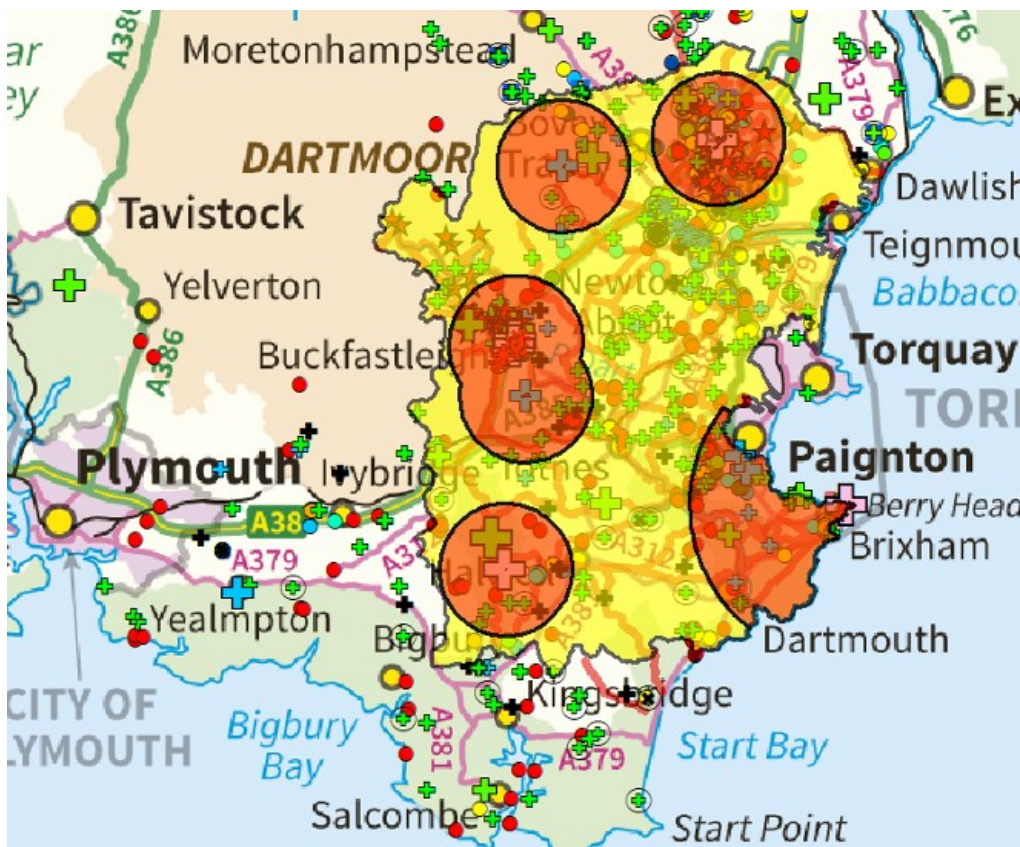
This combined figure includes:

- South Devon AONB (32,762 Ha) (majority of the coastline and large inland areas)
- The Tamar Valley AONB (1,209 Ha inside South Hams)
- Dartmoor National Park (16,539 Ha inside South Hams)

This total does not include the following protected areas (areas outside the designated landscapes):

- Special Areas of Conservation (SAC)

The SAC map for the Greater Horseshoe Bat conservation area.



- Local Nature Reserves (LNRs)
- Sites of Special Scientific Interest (SSSIs)

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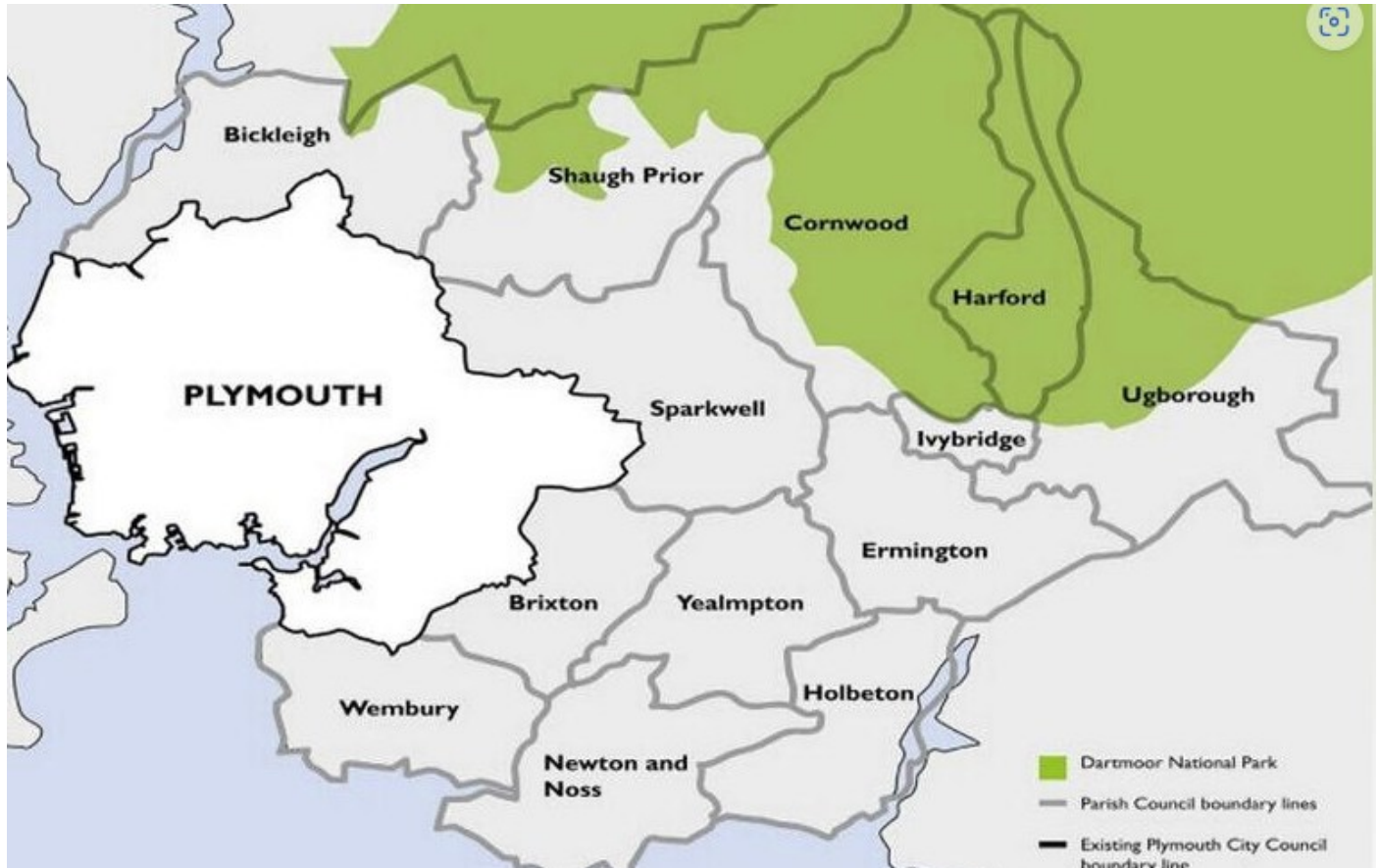
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On reading the context of the South Hams area, the South Hams Society do not support proposals that lead to the breakup of the district's distinct rural identity and protected landscapes of the South Hams into the urban boundaries of the two unitary authorities. The Plymouth City Council proposal is the most harmful with a large area of the South Devon National Landscape being transferred into the distinctively marketed 'Plymouth Ocean City' along with the expansion of Torbay.

It also leads to the fragmentation of the Dartmoor National Park.

The rural character of the South Hams shares no community of interest with the urban priorities of Plymouth or Torbay.

The Plymouth Expansion.



These changes would be actively harmful. It would lead to:

- **Loss of Local Democracy:** Shifting South Hams residents into Plymouth or Torbay control dilutes their voice. Rural issues (farming, narrow-lane infrastructure) often get ignored by urban-centric councils.
- **Environmental Integrity:** The South Hams contains an **Area of Outstanding Natural Beauty (AONB)**. Urban expansion risks "creeping urbanization" that destroys the very green belts that define the region.
- **Infrastructure Strain:** Many South Hams villages already struggle with drainage, road capacity, and GP access. Merging or "carving up" boundaries often leads to high-density housing without the necessary infrastructure upgrades.
- **Local taxes:** Rural communities that live in the countryside would have their local taxes diverted and lost into the unitary authority's urban orientated budgets.
- **The River Erme and the Erme estuary, is an integral and historical part of the 'South Hams' that would be transferred into the 'Ocean City' of Plymouth.**

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The Response to the consultation.

1. Devon County Council proposal — ONE Devon Unitary

- Creates a single Devon Unitary Council covering all of Devon except Plymouth and Torbay.
- Population: 804,000.
- Financial case: lowest implementation cost (£33.6m) and fastest payback (2 years).
- Includes 16 Neighbourhood Area Committees to strengthen local voice.

Plymouth and Torbay remain unchanged.

Impact on South Hams

- South Hams remains whole and joins a single Devon-wide authority (excluding Plymouth & Torbay).
- **No parish boundary changes.**
- **Local identity preserved through 16 Neighbourhood Area Committees**, though these are advisory rather than decision-making.
- Risk: South Hams becomes a small voice in a very large authority (804,000 population).
- **Benefit: Simplest transition, lowest cost, least disruption.**

Community implications

- Planning, housing, and enforcement become centralised.
- Potential loss of district-level nuance on AONB, coastal pressures, and rural infrastructure.
- **Dartmoor National Park – in one unitary authority. Exmoor NP (shared with Somerset).**
- **But South Devon NL (3% shared with Torbay), North Devon NL, East Devon NL, The Tamar Valley NL (shared with Cornwall) & Blackdown Hills NL (shared with Somerset) will have one unitary authority with One Devon could lead to consistently applied higher level overarching policies and protections while retaining distinct local landscape policies.**

With this option we believe that the small area of Jenny Cliff and Staddiscombe could be transferred from the Plymouth City Council boundary into One Devon boundary (approximately 35 Ha) to simplify the protected landscapes partnership operation.

Consultation on the Proposal from Devon County Council (answers).

1 To what extent do you agree or disagree that the proposal suggests councils that are based on sensible geographies and economic areas?

Strongly agree

2 To what extent do you agree or disagree that the proposed councils will be able to deliver the outcomes they describe in the proposal?

Strongly agree

3 To what extent do you agree or disagree that the proposed councils are the right size to be efficient, improve capacity and withstand financial shocks?

Strongly agree

4 To what extent do you agree or disagree that the proposed councils will deliver high quality, sustainable public services?

Somewhat agree

5 To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?

Somewhat agree

6 To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements?

Somewhat agree

7 To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment?

Strongly agree

8 If you would like to, please use the free text box to explain the answers you have provided to questions 1-7 referring to the question numbers as part of your answer. You may also use the box to provide any other comments you have on the proposal.

The One Devon proposal offers clear strategic advantages — a single voice for the county, simplified governance, economies of scale, and more coherent planning and transport. These strengths are real and should be acknowledged, even if the model also carries significant risks for rural representation, local identity, and service responsiveness.

A single strategic voice for rural and coastal Devon

For issues that cut across district boundaries — housing affordability, landscape protection, transport, climate resilience — a single authority could speak with far greater clarity and influence.

This matters for the South Hams because:

- Our rural and coastal challenges are often overshadowed by urban priorities

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- Fragmented governance weakens the case for infrastructure investment
- A unified Devon voice could strengthen bids for funding that support protected landscapes, estuaries, and market towns

Integrated transport and highways planning

A single authority could finally align:

- Rural bus networks
- Road maintenance and drainage
- Active travel routes
- Parking policy
- Traffic regulation orders

For the South Hams, where residents routinely cross district boundaries for work, health, and education, this coherence is a real benefit.

A unified approach to housing and affordability

Devon's housing pressures are not confined to district lines. A single authority could:

- Produce one county-wide Local Plan
- Coordinate affordable housing delivery more strategically
- Align infrastructure with growth
- Address second homes and short-term lets consistently

This could help ensure that rural and coastal communities — including those in the South Hams AONB — are not left behind.

Stronger climate and nature recovery action

Devon's environmental challenges are county-wide:

- Flooding
- Coastal erosion
- Biodiversity loss
- Catchment management
- Landscape-scale nature recovery

A single authority could deliver:

- One Local Nature Recovery Strategy
- Coordinated climate adaptation
- More coherent land-use planning across Dartmoor, the AONBs, and the coast

This aligns closely with the Society's long-standing priorities.

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Potential economies of scale

A single authority could reduce duplication in:

- Procurement
- IT systems
- Back-office functions
- Commissioning of social care
- Waste and recycling contracts

While savings are never guaranteed, the potential is greater in a single-unitary model than in fragmented structures.

Clearer partnership working with Dartmoor National Park

For the South Hams, which borders and interacts heavily with Dartmoor, a single authority would mean:

- One highways partner
- One housing authority
- One emergency planning partner
- One strategic planning partner

This reduces the complexity DNPA currently faces working with multiple districts.

More resilient financial base

A single authority spreads risk across:

- Urban and rural areas
- Coastal and inland economies
- Tourism and manufacturing
- Higher and lower tax bases

This can provide greater financial stability than multiple small districts with fragile budgets.

2. South Hams, Teignbridge & West Devon proposal — THREE unitaries

- Exeter & Northern Devon Unitary
- Plymouth unchanged
- Torbay & Southern Devon Unitary (including South Hams, Teignbridge, Torbay, West Devon)

Impact on South Hams

- South Hams forms part of a Southern Devon Unitary with:
 - Teignbridge
 - West Devon
 - Torbay (unitary status removed and absorbed)
- **No parish transfers in this version.**

Community implications

- Creates a coastal–rural–market town bloc with shared issues (AONB, tourism, housing affordability).
- Risk: Torbay’s financial pressures could dominate the new authority.
- Risk: The costs of service provision has not been acknowledged or costed.
- Benefit: South Hams retains a coherent identity within a mid-sized unitary.

Consultation on the Proposal from South Hams District Council, Teignbridge District Council, and West Devon Borough Council (answers)

1 To what extent do you agree or disagree that the proposal suggests councils that are based on sensible geographies and economic areas?

Neither Agree nor Disagree

2 To what extent do you agree or disagree that the proposed councils will be able to deliver the outcomes they describe in the proposal?

Neither Agree nor Disagree

3 To what extent do you agree or disagree that the proposed councils are the right size to be efficient, improve capacity and withstand financial shocks?

Neither Agree nor Disagree

4 To what extent do you agree or disagree that the proposed councils will deliver high quality, sustainable public services?

Neither Agree nor Disagree

5 To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?

Somewhat agree

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6 To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements?

Neither Agree nor Disagree

7 To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment?

Neither Agree nor Disagree

8 If you would like to, please use the free text box to explain the answers you have provided to questions 1-7 referring to the question numbers as part of your answer. You may also use the box to provide any other comments you have on the proposal.

The Society have concerns regarding the cost burden of becoming the new THREE unitary authority including Dartmoor NP.

We recognise the unitary would *not* be paying for

- **Dartmoor National Park Authority (DNPA) is funded by Defra, not by local council tax.**
- **The new unitary would:**
 - **Not fund DNPA's core budget**
 - **Not take on DNPA staff or pension liabilities**
 - **Not assume DNPA's planning or conservation functions**

But the unitary *would* inherit:

- **Highways and transport across a very rural, low-density area**
 - **Long road lengths per resident**
 - **High maintenance costs (weather, drainage, bridges, verges, gritting)**
 - **Visitor traffic and seasonal peaks without matching council tax base**
- **Adult social care and children's services**
 - **Ageing population in rural/coastal communities**
 - **High travel time for domiciliary care, safeguarding, and outreach**
 - **Difficulty achieving "efficiencies" compared with compact urban areas**
- **Waste disposal and environmental services**
 - **Long collection rounds, multiple depots, higher fuel and fleet costs**
 - **Tourism-driven waste and fly-tipping pressures**
- **Housing, homelessness and temporary accommodation**
 - **High house prices, low wages, and constrained land supply**
 - **Expensive TA and prevention work, especially in coastal towns**

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- **Economic development and regeneration**
 - **Need to support fragile rural economies, market towns, and coastal resorts**
 - **Limited business rate base compared with Plymouth/Exeter-type authorities**

In short: high-cost geography, modest tax base, and structurally expensive statutory services.

The proposed THREE Unitaries Authority including Dartmoor would inherit a disproportionately high-cost base in highways, social care, waste and housing, driven by rurality, protected landscapes and tourism. It would *not* fund Dartmoor National Park Authority, which is financed directly by Defra, **but it would carry the full financial consequences of serving communities and visitors in and around the National Park with a relatively weak council tax and business rate base.**

What the proposal *does* say about Dartmoor

The document explicitly notes that:

- **“Dartmoor National Park will be wholly contained in this area.”** (Torbay & Southern Devon unitary)

But it provides **no financial analysis** of what this means for:

- Highways
- Social care
- Housing
- Visitor management
- Rural service delivery
- Emergency response
- Waste and environmental services

There is **no section** modelling the cost pressures of a National Park geography.

What the councils *have not* considered

A. Highways costs

The proposal does not quantify:

- Rural road length
- Moorland drainage and bridges
- Winter gritting
- Visitor-driven wear and tear
- Low tax base per km of road

None of these appear in the financial case.

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B. Social care costs

No modelling of:

- Rural travel time
- Workforce shortages
- Ageing population in moorland/coastal areas
- SEND transport across long distances

C. Housing pressures

No assessment of:

- Extreme affordability ratios in South Hams/West Devon
- Second-home concentrations
- Limited social housing stock
- High temporary accommodation costs

D. Visitor impact

Despite Dartmoor being a major visitor destination, the proposal does not cost:

- Parking enforcement
- Public toilets
- Litter and waste
- Seasonal demand spikes
- Emergency service pressures

E. Rurality multipliers

The financial case focuses on organisational efficiencies, not the **structural cost base** of a National Park authority area.

The new Torbay & Southern Devon unitary would inherit:

- **The longest, most expensive rural road network in Devon**
- **The highest social-care travel costs**
- **Some of the worst housing affordability in England**
- **Heavy visitor-driven service demand**
- **A weak council-tax and business-rate base**

None of this is costed in the proposal.

The only financial modelling relates to:

- Governance restructuring

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- Management savings
- Shared services
- Transformation efficiencies

It does **not** model the *actual operating cost base* of a Dartmoor-centred authority.

Although **the proposal acknowledges that Dartmoor National Park would sit entirely within the new Torbay & Southern Devon unitary, it contains no assessment of the substantial indirect financial burdens this creates.** The councils **have not modelled the rural highways, social care, housing, visitor-management or environmental service costs associated with serving a National Park geography. As a result, the financial case materially understates the true cost base of the proposed authority.**

The Society believe these financial costs would be better funded and serviced by option 1, One Devon

3. East Devon, Mid Devon, North Devon & Torridge proposal — THREE unitaries with boundary changes

- **Exeter & Northern Devon Unitary**
- **Plymouth Expanded** (absorbing parts of South Hams parishes: Bickleigh, Brixton, Shaugh Prior, Sparkwell)
- **Torbay & Southern Devon Unitary** (remaining South Hams + Teignbridge + Torbay + West Devon)

Impact on South Hams

- **South Hams is split:**
 - **Plymouth expands** to absorb several South Hams parishes (Bickleigh, Brixton, Shaugh Prior, Sparkwell).
 - Remaining South Hams joins a **Southern Devon Unitary** with Teignbridge, West Devon, and Torbay.

Community implications

- **Parts of Dartmoor National Park come into the urban oriented area of Plymouth City Council. National Park areas in the parishes bordering Dartmoor that the city have publicly stated that they do not want.**
- **A larger area of the South Devon NL transfers responsibility to the urban centric Plymouth City Council.**
- **South Hams parishes are broken apart disintegrating the rural community**
- **Loss of rural–urban buffer between Plymouth and the DNP / South Hams countryside.**
- **Increased development pressure on the fringe parishes transferred to Plymouth.**
- **Remaining South Hams still grouped with Teignbridge/West Devon/Torbay.**

Consultation on the Proposal from East Devon Borough Council, Mid Devon District Council, North Devon Council, and Torridge District Council (Answers)

1 To what extent do you agree or disagree that the proposal suggests councils that are based on sensible geographies and economic areas?

Strongly disagree

2 To what extent do you agree or disagree that the proposed councils will be able to deliver the outcomes they describe in the proposal?

Strongly disagree

3 To what extent do you agree or disagree that the proposed councils are the right size to be efficient, improve capacity and withstand financial shocks?

Strongly disagree

4 To what extent do you agree or disagree that the proposed councils will deliver high quality, sustainable public services?

Somewhat disagree

5 To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?

Somewhat disagree

6 To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements?

Strongly disagree

7 To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment?

Strongly disagree

8 If you would like to, please use the free text box to explain the answers you have provided to questions 1-7 referring to the question numbers as part of your answer. You may also use the box to provide any other comments you have on the proposal.

Text box to add further comments:

Community Identity:

The rural character of the South Hams shares no community of interest with the urban priorities of Plymouth or Torbay.

Service Disparity:

An urban council is not equipped to manage rural needs like narrow-lane maintenance, agricultural support, or coastal management.

Plymouth Expansion:

The Plymouth expansion a 'nonsense land grab' that ignores local democracy, nor the wishes of Dartmoor National Park to be placed within a unitary authority.

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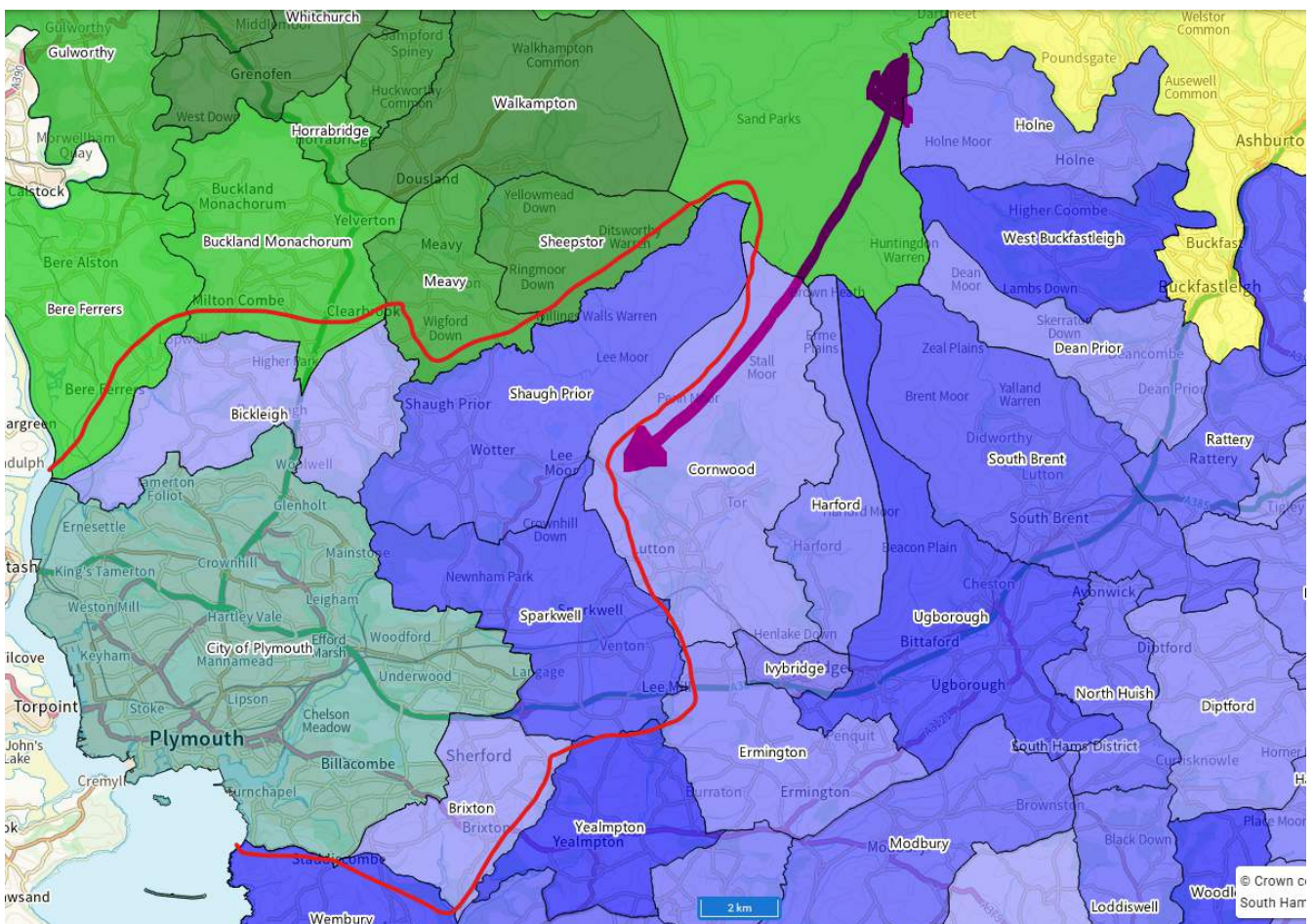
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Issue, West Devon divided from its neighbour the South Hams by Plymouth City.

The current West Devon Borough Council area becomes isolated from the South Hams District Council area without a boundary or road connections segregated by the Shaugh Prior Parish placement inside Plymouth City Council.

The parishes boundaries to be taken by Plymouth City Council disconnect West Devon to the South Hams across the moors. The red line surrounds the 4 parishes taken by this proposal. In this proposal, there are no road connections or community connections between South Hams to West Devon nor across the moors until you come to one small Dartmoor Lane between Dartmeet & Holne. It would be the only road connection between the two former districts. Teignbridge District is yellow on this plan.

Shaugh Prior is essentially moorland.



The lanes between Dartmeet and Holne and across the Moor can often be impassible in winter.

9 This is a proposal that is accompanied by a request that the Secretary of State considers boundary change or that affects wider public services. To what extent do you agree or disagree that the proposal sets out a strong public services and financial sustainability justification for boundary change?

Strongly disagree

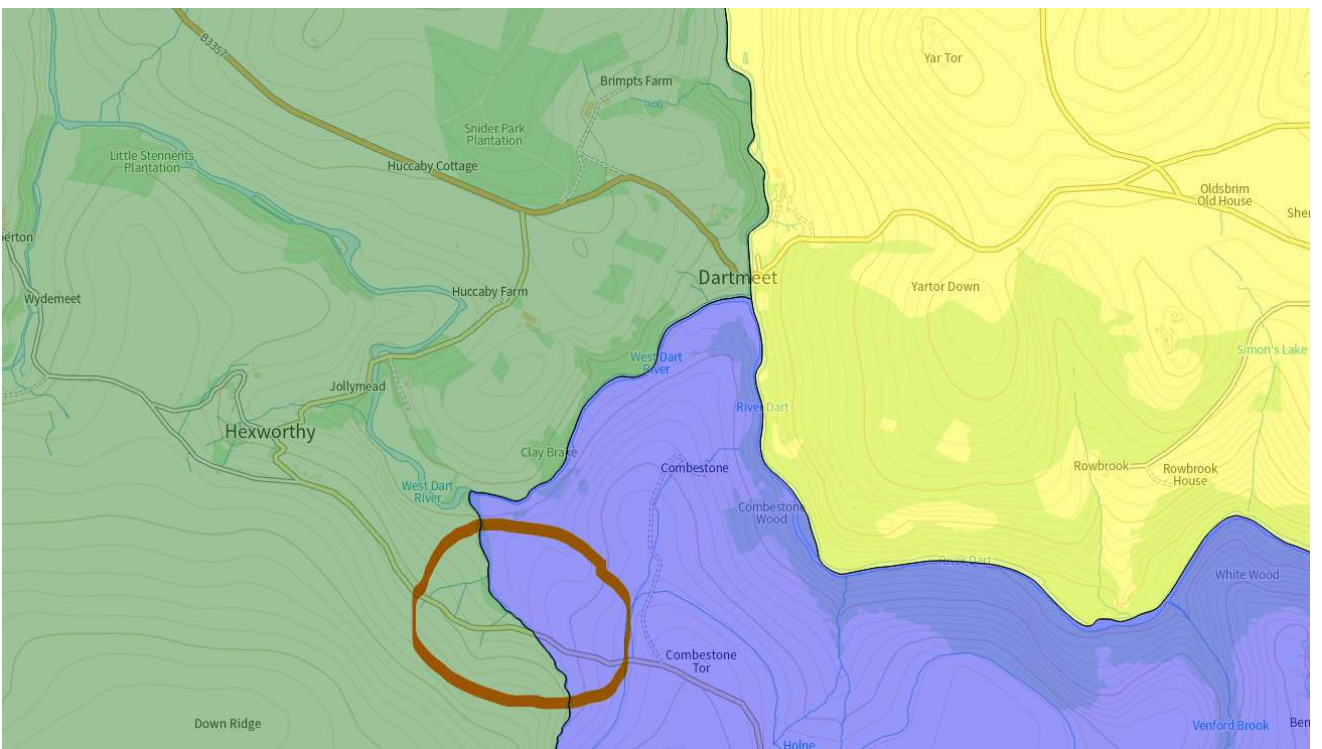
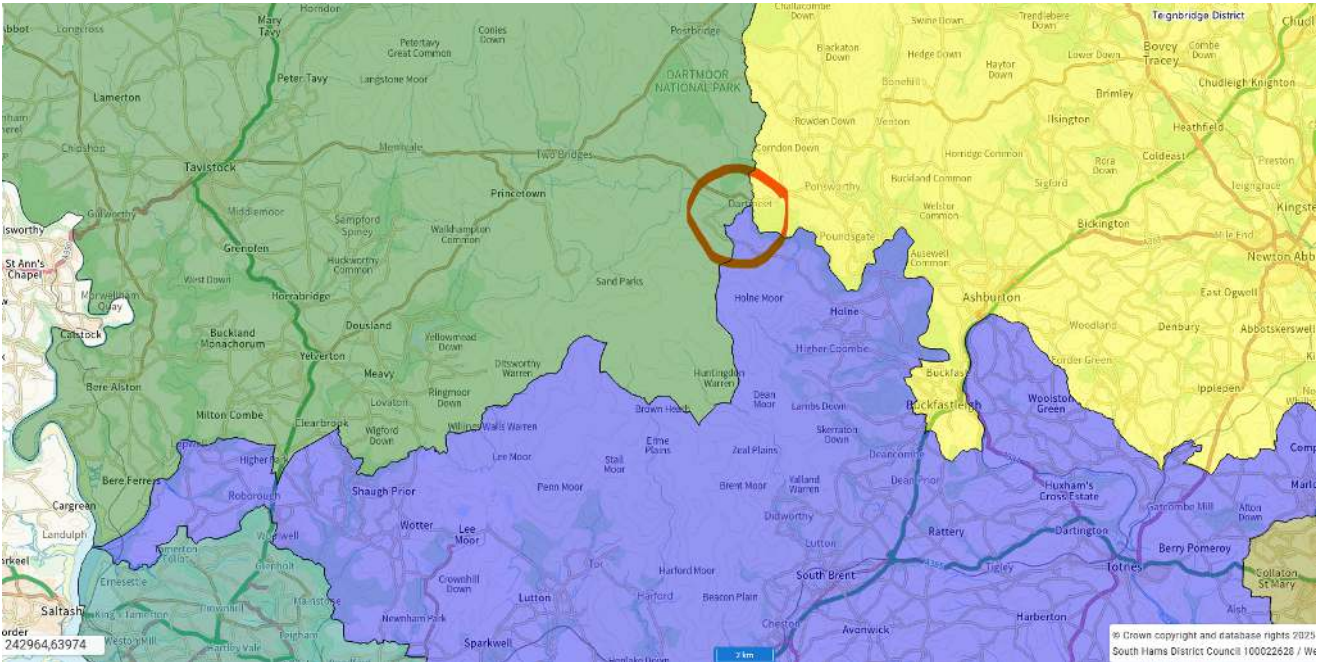
10 If you would like to, please use this free text box to explain your answer to question 9.

This boundary proposal has not been adequately considered.

The only boundary line of communication between the West Devon area and the South Devon area is one little road at Holne.

The rural South Hams and West Devon communities' separation by the Plymouth City boundary extension into the heart of Dartmoor National Park is irrational.

The remaining community link between West Devon and South Hams.



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4. Exeter & Plymouth proposal — FOUR unitaries with major parish transfers

- **Devon Coast & Countryside** (the rest of Devon)
- **Exeter Unitary** (Exeter + 49 surrounding parishes from East Devon, Mid Devon, Teignbridge)
- **Plymouth Unitary** (Plymouth + 13 South Hams parishes)

Torbay Unitary (Torbay + 22 parishes from Teignbridge & South Hams)

Impact on South Hams

This is the **most disruptive** model for South Hams.

- The historic area that is the South Hams is **broken into multiple pieces**:
 - **13 parishes** transferred to an expanded Plymouth Unitary.
 - **22 parishes** transferred to an expanded Torbay Unitary.
 - Remaining rural areas placed into a new **Devon Coast & Countryside Unitary**.

Community implications

- South Hams ceases to exist as a coherent geographic or administrative area.
- Coastal and AONB communities' risk being split between three different authorities.
- Planning policy becomes fragmented, undermining strategic management of:
 - AONB
 - Estuaries
 - Rural housing
 - Tourism and infrastructure

Strong local opposition likely due to identity loss and inconsistent service delivery.

Consultation on the Proposal from Exeter City Council and Plymouth City Council (Answers)

1 To what extent do you agree or disagree that the proposal suggests councils that are based on sensible geographies and economic areas?

Strongly disagree

2 To what extent do you agree or disagree that the proposed councils will be able to deliver the outcomes they describe in the proposal?

Strongly disagree

3 To what extent do you agree or disagree that the proposed councils are the right size to be efficient, improve capacity and withstand financial shocks?

Strongly disagree

4 To what extent do you agree or disagree that the proposed councils will deliver high quality, sustainable public services?

Strongly disagree

5 To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?

Strongly disagree

6 To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements?

Strongly disagree

7 To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment?

Strongly disagree

8 If you would like to, please use the free text box to explain the answers you have provided to questions 1-7 referring to the question numbers as part of your answer. You may also use the box to provide any other comments you have on the proposal.

The Society consider this proposal will cause harm to the South Hams tourism model removing the western side of the South Hams Way.

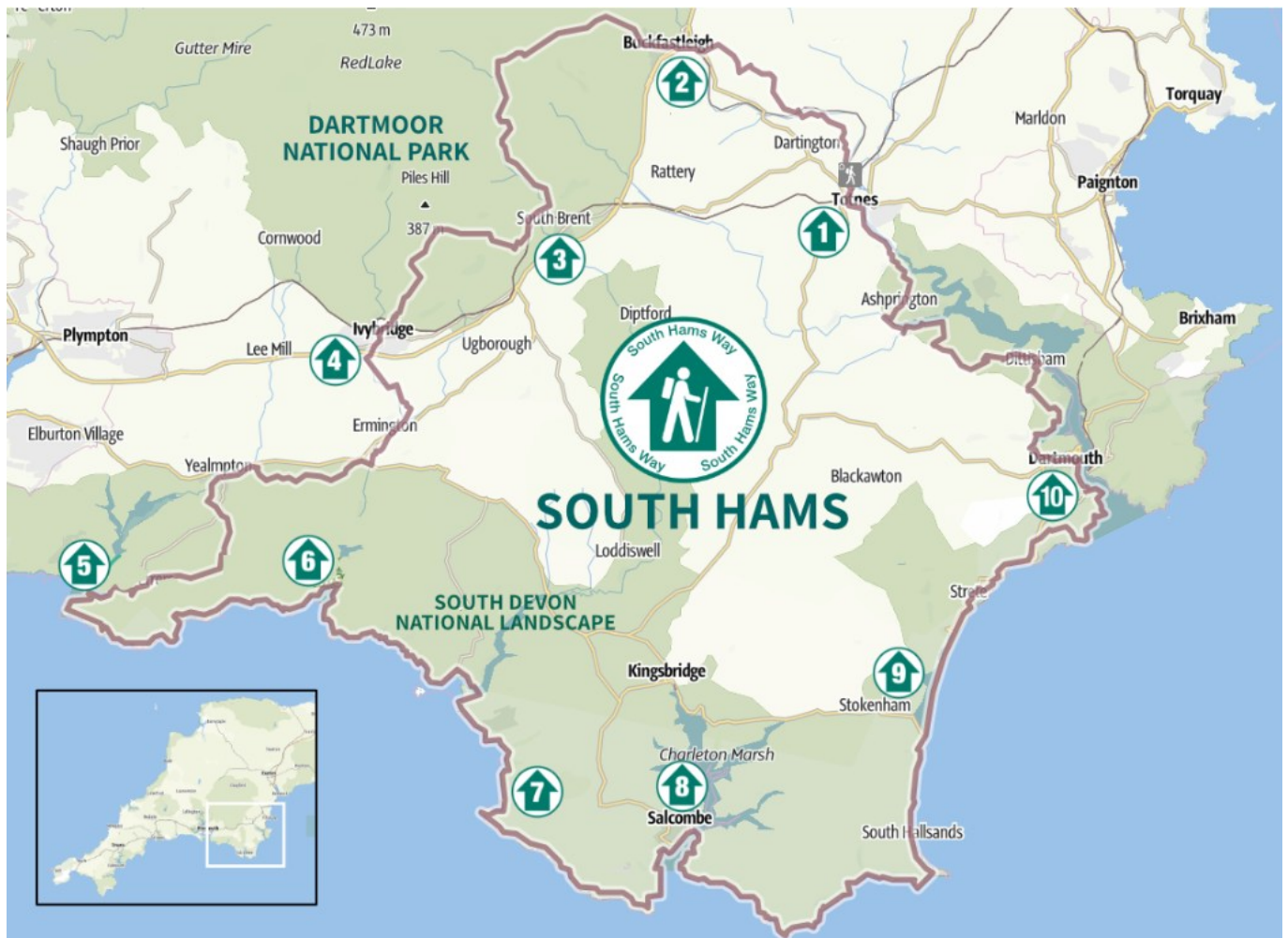
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The South Hams Way

<https://southhamsway.org.uk/>

A spectacular 100-mile circular walk through four very different types of scenery and terrain



9 This is a proposal that is accompanied by a request that the Secretary of State considers boundary change or that affects wider public services. To what extent do you agree or disagree that the proposal sets out a strong public services and financial sustainability justification for boundary change?

Strongly disagree

10 If you would like to, please use this free text box to explain your answer to question 9.

Text box to add further comments:

1. The 13 parishes are selected because they solve Plymouth's problems

Not because the parishes asked for it.

Not because they identify with Plymouth.

Not because they receive poor services now.

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2. The proposal extracts South Hams' most economically valuable territory

It includes:

- Langage
- Sherford
- Woolwell
- Ivybridge
- Freeport-linked land
- High-value tax base villages (Wembury, Yealmpton, Newton & Noss)

It *excludes* remote, low-value, high-cost rural areas.

That's not accidental.

3. Plymouth explicitly wants the growth, tax base, and strategic assets

The document says the expansion:

- improves Plymouth's tax base
- captures the financial benefits of growth
- consolidates strategic economic sites
- aligns with defence-driven investment

This is not neutral language.

4. There is no evidence of parish consent

The plan admits stakeholders are "not currently in a position to express a definitive view".

Translation: they haven't asked the parishes, and they know the answer wouldn't be yes.

5. The proposal is timed to exploit national reorganisation

Plymouth is positioning itself to:

- become the continuing authority
- avoid being swallowed by a Devon unitary
- secure mayoral strategic authority status

This is classic political timing.

From Plymouth's perspective

It's:

- strategic
- overdue
- economically rational

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- aligned with national defence and growth policy
- essential for housing delivery

From the parishes' perspective

It's:

- unrequested
- boundary-driven, not community-driven
- financially extractive
- a takeover of high-value land
- a reorganisation that benefits Plymouth far more than them

From a neutral planning perspective

It's:

- a classic case of an under-bounded city trying to absorb its functional hinterland
- but done without bottom-up consent
- and framed in a way that maximises Plymouth's gain and minimises its costs

Plymouth's document concedes that stakeholders "are not currently in a position to express a definitive view". Despite this, it proceeds to promote a radical redrawing of local government boundaries.

This is an admission that:

there has been no meaningful engagement with the affected parishes;

there is no evidence of local support;

Plymouth is seeking to pre-empt local views in order to secure a favourable position in any future reorganisation.

A proposal of this magnitude, advanced without prior consent from the communities concerned, is fundamentally at odds with principles of localism and community self-determination.

A bid to secure political advantage in future reorganisation

The Interim Plan explicitly seeks Government confirmation that Plymouth will be the "**continuing authority**" in any Devon-wide reorganisation, with an expanded boundary and enhanced strategic status. This is not simply about service delivery; it is a **political positioning exercise** to ensure Plymouth is not subsumed into a wider Devon unitary and instead becomes the dominant authority.

South Hams communities are being used as a **territorial bargaining chip** in Plymouth's bid for future political advantage.

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Why the proposal is contrary to the public interest

1. It undermines coherent rural governance Removing the most economically active and accessible parts of South Hams would:

- fragment existing service patterns and partnerships;
- weaken the financial resilience of the remaining rural district;
- reduce the capacity to support isolated and coastal communities that do not benefit from Plymouth-facing growth.

2. It ignores community identity and functional reality for South Hams Many of the affected parishes have strong identities rooted in South Hams' rural and coastal character, not in Plymouth's urban governance. Functional links (e.g. commuting, shopping) do not equate to a desire to be governed by a different authority—particularly where that authority's stated motivation is fiscal and political.

3. It sets a damaging precedent Allowing a city to unilaterally redraw its boundary to absorb high-value hinterland, based on its own financial pressures, would set a precedent that **invites further cherry-picking of rural areas** across the country, to the detriment of balanced, place-sensitive governance.

Conclusion

Plymouth's own Interim Plan makes clear that the 13-parish proposal is:

- **designed around Plymouth's fiscal, housing and political needs;**
- **selective in extracting South Hams' most valuable territory;**
- **advanced without evidence of parish consent;** and
- **explicitly intended to secure Plymouth's dominance in any future reorganisation.**

On that basis, South Hams Society:

- **reject the characterisation of this as a "modest boundary correction";**
- **oppose the proposal as a Plymouth-first land and tax-base grab;** and
- **call on Government to rule out any boundary changes that are not grounded in clear local consent, whole-place thinking, and the long-term sustainability of rural governance.**

5. Torbay Council proposal — FOUR unitaries

South Hams—Specific Critique of the Torbay Proposal

The Torbay proposal is built around a **four-unitary model**:

- Torbay (unchanged)
- Expanded Plymouth
- Expanded Exeter
- A new **Rural Devon Coast and Countryside Council** covering the remainder of Devon — including the **entire South Hams**.

From a South Hams perspective, several issues stand out.

The proposal centres Torbay's needs, not South Hams'

The document provides extensive evidence for:

- Torbay's public mandate
- Torbay's integrated care model
- Torbay's financial stability
- Torbay's regeneration trajectory

But it provides **very little evidence** about:

- South Hams residents' views
- South Hams' service pressures
- South Hams' housing affordability crisis
- South Hams' infrastructure constraints
- South Hams' environmental designations

This imbalance is visible throughout the proposal

Rural highways and transport costs are not modelled

The proposal highlights Devon's size and dispersed population (), but it does **not** quantify:

- rural road length
- coastal erosion impacts
- Dartmoor-related traffic and maintenance
- seasonal visitor pressures
- the cost of serving low-density settlements

South Hams' highways network — coastal, rural, and heavily used by visitors — would be a major cost centre for the new authority, yet the proposal provides **no financial modelling** of this.

Democratic distance remains a real risk for South Hams

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The proposal argues that four unitaries reduce “democratic distance”. But for South Hams, the new rural authority would be:

- geographically vast
- demographically diverse
- environmentally complex
- spanning multiple market towns, coastal communities, and moorland edges

There is **no clear explanation** of how:

- parish voices would be strengthened
- planning decisions would remain locally responsive
- coastal and inland priorities would be balanced
- South Hams’ distinct identity would be protected

The proposal’s assurances are high-level and not backed by governance detail.

Financial modelling does not reflect South Hams’ cost base

The proposal’s financial case focuses on:

- organisational efficiencies
- leadership consolidation
- systems rationalisation
- transformation savings

But it does **not** model:

- rural social care travel time
- coastal housing pressures
- visitor-driven waste and enforcement costs
- Dartmoor-adjacent service demand
- the weak council-tax base in rural areas

For South Hams, these are core cost drivers.

The Torbay proposal is **coherent for Torbay** but **underdeveloped for South Hams**. Its four-unitary model:

- provides little detail on how the new rural authority would function
- does not model the real cost base of South Hams’ rural and coastal services
- does not address housing affordability or second-home pressures
- does not explain how landscape protections would be resourced
- does not demonstrate how South Hams’ identity and priorities would be safeguarded

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While the Torbay proposal presents a clear and well-evidenced case for Torbay itself, it provides insufficient detail on how the proposed Rural Devon Coast and Countryside Council would meet the complex needs of South Hams' coastal, rural and protected landscapes. Key cost drivers — highways, housing, social care, and environmental management — are not modelled, and the proposal does not demonstrate how local identity and responsiveness would be preserved.

Consultation on the Proposal from Torbay Council (Answers)

1 To what extent do you agree or disagree that the proposal suggests councils that are based on sensible geographies and economic areas?

Strongly disagree

2 To what extent do you agree or disagree that the proposed councils will be able to deliver the outcomes they describe in the proposal?

Strongly disagree

3 To what extent do you agree or disagree that the proposed councils are the right size to be efficient, improve capacity and withstand financial shocks?

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Strongly disagree

8 If you would like to, please use the free text box to explain the answers you have provided to questions 1-7 referring to the question numbers as part of your answer. You may also use the box to provide any other comments you have on the proposal.

The Torbay proposal presents a clear and well-developed case for Torbay's continued unitary status, but it provides insufficient detail on how the proposed "Rural Devon Coast and Countryside Council" would meet the complex needs of areas such as the South Hams. While the document acknowledges that this new authority would encompass extensive rural, coastal and protected

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landscapes, it does not model the significant cost pressures associated with highways, social care, housing affordability, second-home concentrations, or visitor-driven service demand across these geographies. Nor does it explain how local identity, landscape sensitivity, or community responsiveness would be safeguarded within such a large and diverse unitary footprint. As a result, the proposal does not demonstrate that the governance, financial resilience or service delivery arrangements of the new rural authority would be adequate for the South Hams' distinctive environmental, social and economic context.

9 This is a proposal that is accompanied by a request that the Secretary of State considers boundary change or that affects wider public services. To what extent do you agree or disagree that the proposal sets out a strong public services and financial sustainability justification for boundary change?

Strongly disagree

10 If you would like to, please use this free text box to explain your answer to question 9.

The proposal has the identical 13 parish transfer included in the proposal **4 Exeter & Plymouth proposal** — FOUR unitaries with major parish transfers

We recognise that Torbay do not include a transfer of parishes from South Hams to Torbay.

Refer to proposal 4 section 10 for our opinion on the transfer of the 13 parishes from South Hams to Plymouth City.

Statutory / Policy Duty	Proposal 1	Proposal 2	Proposal 3	Proposal 4	Proposal 5
	One Devon	Unitaries SH/Teign/WDBC/ Torbay)	Unitaries + Boundary Changes	Unitaries (Exeter/Plymouth/ Torbay)	Unitaries (Torbay model)
NPPF para 187 – 191 Great weight to AONB	✓ Dartmoor NP and AONB's largely grouped under one authority	✓ Dartmoor NP requires small boundary exchange with Mid Devon to remain intact. AONBs remains intact	✗ AONB split between authorities	✗ Severe fragmentation across 3 authorities	✗ Same fragmentation; Torbay financial risk
NPPF paras 20 – 23 Coherent strategic policies	✓ Very large geography can lead to improved coherent strategic policies	✓ Functional geography preserved	✗ Boundary changes break functional geography	✗ Fragmented geography; inconsistent policy	✗ Same as 4
NPPF paras 24 – 28 Cross-boundary strategic planning	✓ Only small boundaries with two unitary authorities	✓ Strong alignment	✗ Multiple new cross-boundary tensions	✗ High fragmentation; weak coordination	✗ Same as 4
NPPF rural policies (para 88+)	✓ Rural voice maintained with 16 neighbourhood committees	✓ Rural/coastal alignment	✗ Fringe parishes absorbed into Plymouth	✗ Rural areas subordinated to urban centres	✗ Same as 4
Section 85 CROW Act – AONB statutory duty	✓ Authority with 5 AONB areas applying a consistent approach	✓ Single authority for AONB	✗ AONB split; duty inconsistently applied	✗ AONB split across 3 authorities	✗ Same as 4

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AONB Management Plan 2024–2029	✓ 5 AONB areas to share ideas and best practice	✓ Fully aligned	✗ Fragmentation undermines delivery	✗ Impossible to deliver consistently	✗ Same as 4
Environment Act 2021 – LNRS & nature recovery	✓ County-scale LNRS workable	✓ Strong alignment	✗ LNRS boundaries misaligned	✗ LNRS delivery fragmented	✗ Same as 4
Biodiversity Net Gain (BNG) governance	✓ Devon County traditionally have the biodiversity expertise	✓ Good alignment	✗ Urban-rural split weakens BNG delivery	✗ Fragmented BNG governance	✗ Same as 4
Heritage Coast & estuary management	✓ Strong Alignment	✓ Strong alignment	✗ Estuaries split between authorities	✗ Estuaries fragmented across 3 authorities	✗ Same as 4
Localism Act – Neighbourhood Planning	✓ Needs strong local committees	✓ Stable NP environment	✗ NP areas split; evidence bases disrupted	✗ NP areas fragmented; plans undermined	✗ Same as 4
Continuity of Joint Local Plan (JLP)	✓ Requires careful transition	✓ Requires careful transition	✗ JLP area broken apart	✗ JLP becomes unworkable	✗ Same as 4
Duty to Cooperate successor (strategic alignment)	✓ Good alignment	✓ Good alignment	✗ Multiple new boundaries	✗ Fragmented; high risk of failure	✗ Same as 4
Community identity & cohesion	✓ 16 Neighbourhood committees improve community cohesion	✓ Strong alignment	✗ Parishes severed from natural communities	✗ South Hams erased as a place	✗ Same as 4
Financial sustainability	✓ Strongest financial case	✗ Torbay risk	✗ Plymouth expansion risk	✗ Torbay & Plymouth risks amplified	✗ Torbay risk highest
Overall statutory compliance	✓ Strong	✓ Strong	✗ Weak	✗ Very weak	✗ Very weak

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The Society have concerns with all 5 options with the only acceptable options 1 and 2. Proposal 3, 4 and 5 have significant issues because of the breakup of the rural area of the South Hams of South Devon.

The proposal boundary changes 3, 4 and 5 are of a large magnitude, advanced without prior consent from the communities concerned, is fundamentally at odds with principles of localism and community self-determination.

It ignores community identity and functional reality for South Hams. Many of the affected parishes have strong identities rooted in South Hams' rural and coastal character, not in Plymouth's urban governance.

A difficult decision, but because of the uncertainties on the costs of services across Dartmoor, an area of 954 km² that do not appear to be costed, the Societies preferred option is option 1, One Devon with the 16 neighbourhood committees.

Local Government Reorganisation opinion of the South Hams Society,

Leslie Pengelly
Planning Lead.