



Rt Hon Steve Reed MP

Secretary of State for Housing, Communities and Local Government

Alison McGovern MP

Minister of State for Local Government and Homelessness

2 Marsham Street
London. SW1P 4DF

27 November 2025

Proposal for a three unitary model of local government in Kent

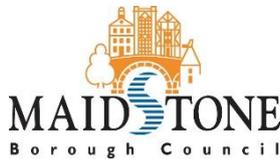
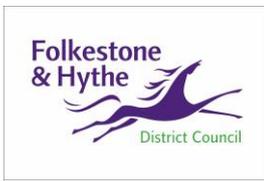
Dear Secretary of State and Minister of State,

Folkestone & Hythe, Maidstone, Sevenoaks, Tonbridge & Malling and Tunbridge Wells councils have come together to seize the opportunities presented by local government reorganisation (LGR) in Kent.

Through joint working and shared vision, we have reached consensus on the model that we believe will best serve our communities and public services, ensuring continuity throughout the transition and long-term sustainability in the delivery of services.

Kent is a unique county – geographically and in relation to both the challenges and opportunities which LGR and devolution presents. We are putting forward a compelling business case for three unitary councils with future devolution and public service reform at the forefront.

Our county's border with Europe means that it is imperative that newly formed unitary councils collaborate closely and continue to support strong collective responses across the area as devolution options are formed. Three unitary councils is the only model which maintains existing boundaries and ensures the key ports and inland border infrastructure are united within a single unitary geography to provide coherent oversight of the county's strategic road and rail entry ports, aiding effective management of critical transport corridors to and from the UK (and maintaining the through-flow of nationally significant freight services and domestic and overseas travellers).



We are united in our commitment to a model that enables all of Kent to thrive, including finding collaborative solutions across Kent-wide priorities and we will continue to work together as neighbours as we move to new structures of local government.

For the reasons set out below, we are confident that a three unitary model is the most effective solution for the county of Kent.

1) It is fully compliant

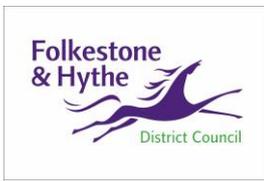
Independent analysis undertaken on behalf of Kent councils by KPMG has shown that a three-unitary model complies most strongly and closely with the criteria set out by Government. It is the only model that meets the stated population thresholds, uses existing council areas as the building blocks of the new proposed unitary councils and completely avoids the significant risks and complexity associated with options which break these boundaries. Our model provides a clear and compliant structure for local government able to meet the unique challenges for our county, which can be addressed most effectively by devolution and a Strategic Mayoral Authority in the near future.

2) It is financially sustainable

It achieves the right balance between the scale required to operate strategically, withstand financial shocks and avoid diseconomies of scale whilst being small enough to be local and responsive.

The proposed size of each unitary authority will allow the demand for critical adults and children's services to be managed effectively and provide the greatest opportunity for the management of debt, with financing ratios closely aligned across proposed unitary areas. Each council proposed has a strong fiscal starting position, balanced tax base and fair and manageable council tax variations.

Of the models assessed by KPMG the three unitary model offers the lowest implementation costs, highest savings and shortest payback periods.



3) It is transformational

A key objective of LGR is the prospect of integrating how different public sector bodies work with one another to reduce costs and focus on prevention.

Public sector partners have made clear that not only would other unitary configurations shunt costs onto how they have to organise themselves, but also that they would inhibit public sector reform.

Conversely, a three unitary model maps very closely onto health and care partnerships and exactly onto policing and fire and rescue geographies. This would unlock the potential of public sector reform and collaborative partnership working around early intervention and prevention services.

The three unitary model also provides councils of the right size for effective strategic planning to meet priorities including government housing targets, economic growth and supporting integration with preventative and integrated care.

4) It is deeply unifying

Evidence from our business case and resident engagement exercises tell us that the three unitary model best aligns with local identity and work/leisure patterns. We believe that our proposal will make sense to residents, businesses, our voluntary partners and service users. A county-wide survey has also shown that a three unitary model secured the most public support in terms of preserving important area-based partnership delivery arrangements.

Kent councils have worked exceptionally successfully preserve a collaborative approach to LGR. Amongst the options put forward, a three unitary model was one of only two models (along with option 4B) to be taken forward on behalf of all Kent councils and has consistently enjoyed the highest levels of support from councils within Kent as well as the greatest level of support from key partners.

5) It is deliverable

Above all else, we strongly believe that a three unitary model is the most deliverable model for LGR given that it requires the least disaggregation of crucial upper tier services and avoids the breakup of existing boundaries which would add insufficient benefit to the entire county.



Breaking up boundaries produces a significant imbalance in population size between unitary authorities and creates some council areas that will simply be too small to manage current and projected demand for social care and lack the capacity to be financially sustainable.

Changing boundaries will have a significant impact on risk, complexity, cost and time.

We are particularly concerned about the significant additional risks that would arise from any options that rely on multiple boundary breaks as this would lead to an exponential increase in activities and functions that would need to be disaggregated across multiple geographies adding significant complexity to what is already inherently a challenging context of bringing together 14 councils (a county, a unitary and 12 boroughs and districts) in a population of almost 2 million people. These risks are avoided with a three unitary model grounded in established service and administrative boundaries alongside recognised geographies of place.

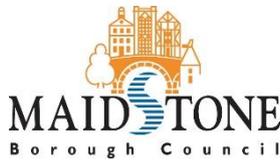
Put simply, a three unitary model is the natural choice for Kent. It would allow us to think big and act local and, coupled with a devolution agreement for Kent, to re-imagine how services are delivered and to create lasting public sector reform.

This is a view strongly supported by our key public service partners including health, police and fire and rescue services.

Route map to implementation

We would urge government to consider three requests in relation the implementation of LGR in Kent:

- i. **We cannot underestimate the importance of aligning LGR with the start of a journey towards devolution in Kent** – even if this were only to be at a foundational level in the first instance.
- ii. **We are concerned about the levels of debt held by councils across Kent.** Whilst the three unitary model provides the strongest baseline to finance the existing debt, if it is not substantially reduced, it remains a risk to future success of LGR and improving the lives of our residents. It is both inequitable and unsustainable for the new unitary councils to inherit levels of debt equivalent to over £1,200 per capita.
- iii. **We are keen to preserve the way in which we have historically worked together as local authorities in Kent.** Kent is perhaps unique in the country in that we have maintained a principle within our decision-making that no one voice in the room holds any greater weight than any other. We each have an



equal voice, and we work together positively and collegiately. We would wish to preserve this principle within any transitional arrangements.

Accordingly, it is our view that a joint committee should have equal representation from each constituent authority. It is evident to us that representation of up to three councillors from the County Council and from each of the district/borough/unitary councils within each new unitary council would be the right structure for Kent. Further, the chair of the joint committee should be determined by its members.

We politely ask that this covering letter is considered alongside the business case we have submitted as part of our individual submissions.

Yours Sincerely,

Cllr Jim Martin
Leader,
Folkestone &
Hythe DC

Cllr Stuart Jeffrey
Leader,
Maidstone BC

Cllr Matt Boughton
Leader,
Tonbridge and
Malling BC

Cllr Kevin Maskell
Leader,
Sevenoaks DC

Cllr Ben Chapelard
Leader,
Tunbridge Wells BC