

The Rt Hon Angela Rayner MP
Secretary of State for Housing, Communities and Local
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Ministry of Housing, Communities and Local Government
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Cllr David Wulff
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27 August 2026

Dear Secretary of State,

Devon Local Government Reorganisation – Interim Warding Arrangements

We are writing as the Leader and Cabinet of Mid Devon District Council to express our concerns about the process used to develop the interim warding arrangements for the new unitary authorities in Devon.

We recognise the demanding timetable Government is working to in order to enable elections to the new authorities in May 2027. We also commend the considerable effort undertaken by electoral services officers across Devon, who were given an extremely difficult task and have worked collaboratively and professionally within the parameters set by Government.

However, therein lies much of the problem.

The extraordinarily compressed timetable meant that detailed warding arrangements had to be developed and agreed across Devon in a matter of weeks, during the main summer holiday period. This left very little opportunity for meaningful democratic oversight or for elected members to contribute their knowledge of the communities they represent.

Warding is not simply a technical exercise in dividing populations into approximately equal numbers. It determines which communities are represented together, how accessible their councillors are and, ultimately, how residents relate to the councils making decisions on their behalf.

Yet councillors with detailed knowledge of the relationships between settlements, local geography, infrastructure, economic activity and community identity had no opportunity to influence those arrangements or scrutinise their rationale. We do not believe that is a satisfactory way to design democratic representation.

Electoral equality is, of course, important. But wards should, wherever reasonably possible, respect place-based boundaries and align representation with the geographical, economic and social areas within which people actually live their lives.

Place is the most fundamental building block of community and personal belonging. A ward may work perfectly well mathematically while making very little sense locally. Communities are shaped by where people shop, work and go to school; the roads and public transport they use; the services upon which they depend; landscape, rivers and geography; relationships between settlements; and people's own sense of where they belong. These considerations cannot always fit neatly within numerical thresholds, but they should be central to the judgement when boundaries are drawn.

We are also concerned about the cumulative impact on rural representation. Fewer councillors will represent substantially larger wards, particularly across rural areas where settlements can be widely dispersed and poorly connected. That inevitably reduces the capacity of elected members to engage directly with residents and creates a risk that the distinct priorities of rural communities will be diluted within much larger authorities. In parts of rural Mid Devon, councillor duties will double due to reorganisation, whilst capacity is halved.

We recognise the potential benefits of further devolution through a Strategic Mayoral Authority, particularly for strategic planning, infrastructure and securing investment. However, creating a more strategic tier of governance at the regional scale makes it even more important that effective democratic structures exist beneath it. The recent warding decisions undermine local representation therefore the net result could be contrary to intentions and deliver more top-down governance.

We must avoid the removal district councils leading to the creation of substantially larger unitary wards and a more distant strategic authority. There is a high risk that this would leave a democratic void between those institutions and individual communities.

Strong local arrangements – whether through area committees, community boards or other forms of effective local or soft governance – should therefore be an integral part of the new system. They must have sufficient legitimacy, influence and connection to decision-making and be place-based, to provide communities with a meaningful voice and build place attachment. We believe this is fundamental to our role in local government and will provide the real change you are seeking which can only be delivered through a genuine partnership between local, regional and national government ('Rewiring the State' 26th August letter from Andy Burnham to Local Government leaders).

We are looking carefully at experience elsewhere, including Somerset and Cumbria, where different approaches to local governance within large unitary authorities have been developed. We would welcome any evidence or guidance MHCLG can provide on models which have demonstrably maintained genuine local democratic participation.

We accept that an ambitious programme of local government reorganisation requires decisions to be taken at pace and that reform of long-established institutions will involve disruption. However, local government is the most accessible form of government to many people. The relationship between citizens, their communities and their elected representatives is one of the great strengths of our democratic system and should not be unnecessarily weakened in the process of reform.

We therefore ask you to consider and respond to three issues:

- **Community identity and interim boundaries:** how will community identity, geography, place-attachment, patterns of movement and established relationships between places be considered alongside electoral equality, and what opportunity remains to correct arrangements which are clearly anomalous locally before they take effect?
- **Democratic oversight and the Boundary Commission:** why were councils not afforded sufficient time for meaningful member scrutiny of these proposals? Our remit is to represent constituents' interests, which we deeply understand, but our knowledge has been completely ignored in this process. How will Government ensure that the subsequent Local Government Boundary Commission review provides a genuine opportunity to consider community identity and place rather than becoming a further numerical exercise?
- **Local democracy within the new structures:** what role does Government envisage for effective area-based or local governance beneath the new unitary authorities and Strategic Mayoral Authority, and what evidence can MHCLG share about models which have successfully maintained community representation in large rural authorities?

This is not an argument for allowing electoral or political interests to determine boundaries. Quite the opposite. It is an argument that the people we represent and the places they call home should be treated as communities rather than units of population to be arbitrarily assembled into new wards.

Local government reorganisation will bring unavoidable change for our residents, officers, elected members and partners. Where that disruption is necessary to deliver reform and devolution, we have a collective responsibility to ensure that the new arrangements command public understanding, confidence and democratic legitimacy.

That requires transparency, meaningful local input and sufficient space for the identities of our communities to inform the decisions being taken.

In the recent letter from the Prime Minister to Local Government leaders, Andy Burnham recognises how local government capacity has been hacked away and he is looking for a new settlement between central and local government, *ensuring no community is left behind*. The recent ward boundary changes run contrary to the Prime Minister's intentions, despite his assurance that 'my belief in the power of local government is not simply sentiment'. In this letter we have offered an opportunity for

you to redress recent ward boundary changes with a route to enable trust and empower the people who know their places best.

We would welcome your response.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'D. Wulff', is positioned above the printed name of the signatory.

Cllr David Wulff
Leader of the Council

Cllr Natasha Bradshaw, Environment and Climate Change

Cllr Guy Cochran, Quality of Living, Equalities and Public Health

Cllr John Downes, Governance, Finance and Risk

Cllr Gwen Duchesne, Parish and community Engagement

Cllr Steve Keable, Planning and Economic Regeneration

Cllr Lloyd Knight, People Development

Cllr Jane Lock, Housing, Assets and Property Services

Cllr Josh Wright, Service Delivery and Continuous Improvement