

The Rt Hon Shabana Mahmood MP
Home Secretary
2 Marsham Street
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Sent by email

29th July 2026

Dear Home Secretary

Independent Review of Police Force Structures

Congratulations on your reappointment as Home Secretary. I know that the programme of reform you set out in January in the White Paper will continue to remain a priority for you and I stand ready to work with you, your ministerial team and officials to help ensure that the right decisions are taken for the public in the context of policing reform.

As the directly elected representative of the 1.8 million residents of Devon, Cornwall and the Isles of Scilly what matters most to me is ensuring that the residents I serve receive high quality, well-funded and responsive policing.

How policing is structured matters. It matters not only for the prevention and detection of crime but for delivery of the police's substantial public safety responsibilities in areas like safeguarding and road safety. It also has significant repercussions for legitimacy and for how the police are held to account by the public's representatives.

I am deeply concerned that the move towards fewer, larger forces will result in a poorer level of service for the communities I serve and reduced accountability to them. Devon and Cornwall is already an extremely large police force area. Spanning 4,000 square miles, with over 730 miles of coastline and 13,500 miles of road we are the largest geographic force in England.

We have seen no evidence that making forces like ours, that are already large, even bigger will bring opportunities or benefits for the public or partners or improve public confidence. The reverse is actually more likely. As strategic leadership and resourcing become remote with less understanding of local context it leaves rural areas at risk of under-resourcing. Cornwall already feels remote from Devon. Furthermore, the scale of disruption and costs of transition will lead to reductions in service for many years at a



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Your voice in policing

time when we need to continue to focus on improving the services we provide for the public that we serve.

My concern around compelling Devon and Cornwall to merge with other police forces is shared by local residents, with **72% of those who responded to my recent public survey voicing their opposition to a merger.** It is also shared by local authority, business and public sector leaders across the peninsula with whom the Chief Constable and I have been speaking who express concern around the scale, complexity and cost of such changes and the risks to effective policing from chief officers and accountability structures becoming remote. There are opportunities to work more collaboratively at the regional level and whilst our region is already strong in this area we can and should look to do more. **Partners are telling us they require strong relationships with the overall strategic leadership of the force, the Chief Constable and also with the Policing and Crime Lead and are concerned that this will not be viable or effective in a very large force.**

Over 1600 people responded to my survey locally, with almost three quarters of them stating that Devon and Cornwall Police should not be merged with other forces to create a larger force. This opposition was strongly felt, as when asked about potential merger options if we were forced to merge with other forces, over 54% insisted that they could not support a merger in any circumstances. The survey findings showed that respondents saw little or no benefit from a merger but considerable risks, in particular in relation to loss of focus on local policing, loss of local knowledge and being less responsive to local need.

I am publishing the public survey results (which are attached to this letter) and have shared them with the Independent Review Team who will be submitting their recommendations to you by the end of summer. **My survey has highlighted the need to create a clear and robust case along with good communication plans to articulate and promote the benefits of any change.** Without doing so we all risk further damage to legitimacy and public confidence.

On behalf of the communities of Devon, Cornwall and the Isles of Scilly **I seek your assurance that, in considering the Review's recommendations you will require any decisions to be subject to robust business cases.** These will need to set out the specific costs, benefits and risks for each specific local area as well as the impact on protected groups and must consider not just the police's role in tackling crime but their wider role in public safety. **I also ask you to commit to meaningful engagement with communities, elected representatives, public and private sector leaders on the future shape of policing in their area.**

I am not opposed to change, where it can be evidenced that it will bring improvements in services for the public. For some police forces, merging could bring increased financial resilience and unlock benefits for operational policing services in that area, but this will not be the case for all. For example, a southwest police force that brings together the five police forces in the region would span a landmass of over 9,000 square miles (18% of the landmass of England). It would have a population of almost 6 million people spread across a mixture of urban, rural and coastal communities, with high density urban areas concentrated in the north of the region. Under the LGR plans announced last week it would also incorporate over 15 local authorities which range in size, composition and need. **How will the Chief Constable and the Police and Crime Board be able to effectively understand and balance need, exercise sufficient grip and maintain strategic engagement over such a vast and varied geography?**

I know, from listening to you speak at the Justice and Home Affairs Committee in the House of Lords earlier this month, that you consider the answer to be a renewed model of Local Policing Areas (LPA) most likely based around local authority boundaries. Whilst I recognise the benefits of greater local alignment and accountability, as I set out in my response to the Call for Evidence we need to recognise that this cannot and will not mitigate these risks and will lead to a postcode lottery in policing services.

It will be the Chief Constable who will control the range of operational resources that need to be deployed in an LPA to meet policing needs. That includes decisions around what resources are given directly to the LPA Commander and their access to wider force resources that the LPA will rely upon. Chief Constables and policing governance must both be sufficiently connected to the LPA to understand the local context and to build and maintain strategic relationships. If a force becomes too large the Chief Constable and the Police and Crime Lead will be disconnected from local areas and Police and Crime Board members will be making significant decisions on services and investment affecting distant locations with limited understanding of the local context. This raises significant and specific risks for rural and remote LPAs around resourcing levels, in relation to crime, emergency response and public safety incidents.

As I set out in my response to Lord Hogan-Howe's Call for Evidence, I believe there is a better way to deliver the benefits you seek from police reform. **A programme of targeted reform that mandates certain matters would be less disruptive for the public, partners and staff, be quicker to achieve and much less risky.** As Home Secretary, you already have the powers to do this through legal direction, as previous post holders used them to create the National Police Air Service. Examples of what could be considered instead of significant structural changes are:

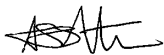
- Mandating greater regional collaboration for enabling/support services and reforming S22a arrangements. The five Southwest forces already deliver collaborations valuing £86M, and there is scope to go further.

- Strengthening mutual aid arrangements to speed up mobilisation and targeting areas that do not deliver to provide additional operational flexibility and resilience.
- Adopting a targeted approach to police force mergers to address localised financial resilience issues.
- Reforming the police funding formula to support financial resilience by properly reflecting the costs of policing, including the impacts of sparsity and seasonality.

Devon and Cornwall can speak from considerable experience on these matters, being one of the only areas in recent history to have fully explored the issues associated with police force mergers through our work establishing a strategic alliance and our exploration of a merger with Dorset Police. The Chief Constable and I remain keen to share this insight with you. We are due to meet the Policing Minister in September to discuss these matters and would welcome the opportunity to meet directly with you to share our experiences and continue these discussions.

This letter is being published on my website (and I will publish any reply), as part of my commitment to ensuring transparency to the public and partners on the implications of police reform. **Our local council taxpayers fund 43% of our police force so I am publishing all my responses to any consultations, and the Chief Constable has agreed to do the same.** This is because we are trying to help our communities engage as early as possible to identify risks and gaps in understanding and to enable the public to have a voice through any change that comes forward.

Yours Sincerely,



Alison Hernandez

Police and Crime Commissioner for Devon, Cornwall and the Isles of Scilly

Copied to:

Chief Constable James Vaughan QPM, Devon and Cornwall Police

Lord Bernard Hogan-Howe, Chair of the Independent Review of Police Force Structures

Sarah Jones MP, Policing Minister