Final recommendations on the future electoral arrangements for South Northamptonshire in Northamptonshire

Further electoral review

May 2006

Translations and other formats

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Contents

Wh	at is the Boundary Committee for England?	5
Exe	ecutive summary	7
1	Introduction	15
2	Current electoral arrangements	19
3	Draft recommendations	23
4	Responses to consultation	25
5	Analysis and final recommendations Electorate figures Council size Electoral equality General analysis Warding arrangements Astwell, Kings Sutton, Little Brook, Middleton Cheney and Steane wards	27 27 28 29 30 31 31
	Brackley East, Brackley South and Brackley West wards Blakesley, Cote, Kingthorn, Wardoun and Washington wards Blisworth, Courteenhall, Downs, Grange, Harpole and	32 33 34
	Heyford wards Cosgrove, Deanshanger, Grafton, Silverstone, Tove and Whittlewood wards Towcester Brook and Towcester Mill wards Chase, Cogenhoe, Salcey and Yardley wards Conclusions Parish electoral arrangements	37 38 39 41 42
6	What happens next?	45
7	Mapping	47

Appendices

Α	Glossary and abbreviations	49
В	Code of practice on written consultation	52

What is the Boundary Committee for England?

The Boundary Committee for England is a committee of the Electoral Commission, an independent body set up by Parliament under the Political Parties, Elections and Referendums Act 2000. It is responsible for conducting reviews as directed by the Electoral Commission or the Secretary of State.

Members of the Committee are:

Pamela Gordon (Chair) Robin Gray Joan Jones CBE Ann M. Kelly Professor Colin Mellors

Director:

Archie Gall

When conducting reviews our aim is to ensure that the number of electors represented by each councillor in an area is as nearly as possible the same, taking into account local circumstances. We can recommend changes to ward boundaries, the number of councillors and ward names. We can also recommend changes to the electoral arrangements of parish and town councils.

Executive summary

The Boundary Committee for England is the body responsible for conducting electoral reviews of local authorities. A further electoral review of South Northamptonshire is being undertaken to provide improved levels of electoral equality across the district. It aims to ensure that the number of voters represented by each district councillor is approximately the same. The Electoral Commission directed the Boundary Committee to undertake this review on 2 June 2004.

Current electoral arrangements

Under the existing arrangements, 15 wards currently have electoral variances of more than 10% from the district average. The development that the District Council forecast during the last review for the five-year period between 1996 and 2001 was, in some areas, not realised, particularly in Cogenhoe ward. However, in Courteenhall ward, more development was undertaken than expected, which has resulted in it having a particularly poor variance, with 40% more electors than the district average.

Every review is conducted in four stages:

Stage	Stage starts	Description
One	3 August 2004	Submission of proposals to us
Two	16 November 2004	Our analysis and deliberation
Three	17 May 2005	Publication of draft recommendations and consultation on them
Four	9 August 2005	Analysis of submissions received and formulation of final recommendations

Draft recommendations

The District Council proposed an increase in council size from 42 to 43 members. We were not persuaded by the supporting argument and evidence to adopt this proposal. Having considered all the information made available to us and the distribution of councillors across the district we proposed to retain the existing council size.

We proposed to adopt 10 of the rural wards proposed by the District Council, predominantly situated towards the south of the district. However, in order to provide for significant improvements in the levels of electoral equality we either proposed amendments to the District Council's proposals or put forward our own proposals for the remainder of the district.

Responses to consultation

We received 31 submissions during Stage Three predominantly concerning three issues. There was significant opposition to our proposed Grange Park ward that focused on the combination of urban and rural areas. Respondents argued that the recommendations for the northern rural area of the district united unrelated communities. There was broad opposition to our recommendations for rural two-

member wards as it was considered they would not provide a good reflection of community identities or secure effective and convenient local government.

Analysis and final recommendations

Electorate figures

Bugbrooke Parish Council contended that the electorate figures were conservative for its area. After seeking the District Council's view we concluded that its electorate projections are the best estimates that could reasonably be made at this time.

Council size

We propose to endorse the recommendation to retain the current council size. Three respondents proposed to change the current council size to facilitate their proposed alternative ward patterns. However, we believe that any proposals on council size should be developed and argued in the context of the authority's internal political management structures and the changing roles of councillors.

General analysis

We propose to substantially endorse our draft recommendations. We have examined the opposition and alternative proposals regarding our proposed two-member rural wards and our recommendations in the northern rural area, but we have concluded that there is insufficient evidence to justify the levels of electoral inequality created by moving away from our recommendations. However, we do consider that there is sufficient evidence to justify modifying our recommendations for Grange Park ward.

What happens next?

All further correspondence on these final recommendations and the matters discussed in this report should be sent to the Electoral Commission through the contact details below. The Commission will not make an Order implementing them before 27 June 2006. The information in the representations will be available for public access once the Order has been made.

The Secretary
The Electoral Commission
Trevelyan House
Great Peter Street
London SW1P 2HW

Fax: 020 7271 0667

Email: implementation@electoralcommission.org.uk

The contact details above should only be used for implementation purposes.

The full report is available to download at www.boundarycommittee.org.uk.

Table 1: Final recommendations: Summary

	Ward name	Number of councillors	Constituent areas
1	Astwell	1	The existing Astwell ward (Helmdon parish; Radstone parish; Syresham parish; Whitfield parish)
2	Blakesley & Cote	2	The existing Blakesley ward (Adstone parish; Blakesley parish; Cold Higham parish; Litchborough parish; Maidford parish; Slapton parish; Woodend parish) and the existing Cote ward (Pattishall parish; Tiffield parish)
3	Blisworth & Roade	2	The existing Blisworth ward (Blisworth parish) and part of the existing Courteenhall ward (Courteenhall parish; Roade parish)
4	Brackley East	2	Part of the existing Brackley East ward and part of the existing Brackley West ward (the proposed East parish ward of Brackley parish)
5	Brackley South	2	The existing Brackley South ward, part of the existing Brackley East ward and part of the existing Brackley West ward (the proposed South parish ward of Brackley parish)
6	Brackley West	2	Part of the existing Brackley West ward (the proposed West parish ward of Brackley parish)
7	Brafield & Yardley	2	The existing Cogenhoe ward (Cogenhoe & Whiston parish), the existing Yardley ward (Castle Ashby parish; Denton parish; Yardley Hastings parish) and part of the existing Chase ward (Brafield-on-the-Green parish; Little Houghton parish)
8	Cosgrove & Grafton	1	Part of the existing Cosgrove ward (Cosgrove parish) and part of the existing Grafton ward (Grafton Regis parish; Yardley Gobion parish)
9	Danvers & Wardoun	2	The existing Wardoun ward (Aston le Walls parish; Boddington parish; Chacombe parish; Chipping Warden; Culworth parish; Edgcote parish; Eydon parish; Marston St Lawrence parish; Thorpe Mandeville parish; Thenford parish)
10	Deanshanger	2	The existing Deanshanger ward (Deanshanger parish; Wicken parish)
11	Downs & Heyford	2	The existing Heyford ward (Nether Heyford parish; Upper Heyford parish) and part of the existing Downs ward (Bugbrooke parish)

	Ward name	Number of councillors	Constituent areas
12	Grange Park	2	Part of the existing Courteenhall ward (Grange Park parish)
13	Hackleton	1	Part of the existing Chase ward (Hackleton parish; Quinton parish)
14	Harpole & 2 Grange		The existing Grange ward (Kislingbury parish; Rothersthorpe parish), the existing Harpole ward (Harpole parish), part of the existing Downs ward (Gayton parish) and part of the existing Courteenthall ward (Milton Malsor parish)
15	Kings Sutton	1	The existing Kings Sutton ward (Kings Sutton parish)
16	Kingthorn	1	The existing Kingthorn ward (Bradden parish; Greens Norton parish)
17	Little Brook	1	The existing Little Brook ward (Aynho parish; Croughton parish; Evenley parish)
18	Middleton Cheney	2	The existing Middleton Cheney ward (Middleton Cheney parish; Overthorpe parish; Warkworth parish)
19	Old Stratford	1	Part of the existing Cosgrove ward (Old Stratford parish)
20	Salcey	1	The existing Salcey ward (Hartwell parish) and part of the existing Grafton ward (Ashton parish)
21	Silverstone	1	The existing Silverstone ward (Silverstone parish)
22	Steane	1	The existing Steane ward (Farthinghoe parish; Greatworth parish; Hinton-in-the Hedges parish; Newbottle parish)
23	Tove	1	The existing Tove ward (Paulerspury parish; Shutlanger parish; Stoke Bruerne parish) and part of the existing Grafton ward (Alderton parish)
24	Towcester Brook	3	Part of the existing Towcester Brook ward and part of the existing Towcester Mill ward (the proposed Brook parish ward of Towcester parish)
25	Towcester Mill	2	Part of the existing Towcester Brook ward and part of the existing Towcester Mill ward (the proposed Mill parish ward of Towcester parish) and Easton Neston parish

	Ward name	Number of councillors	Constituent areas
26	Washington	1	The existing Washington ward (Abthorpe parish; Moreton Pinkney parish; Sulgrave parish; Wappenham parish; Weston & Weedon parish)
27	Whittlewood	1	The existing Whittlewood ward (Potterspury parish; Whittlebury parish)

Notes

- The whole district is parished.
- The maps accompanying this report illustrate the proposed wards outlined above.
 We have made a number of minor boundary amendments to ensure that existing ward boundaries adhere to ground detail. These changes do not affect any electors.

Table 2: Final recommendations for South Northamptonshire district

	Ward name	Number of councillors	Electorate (2003)	Number of electors per councillor	Variance from average %	Electorate (2008)	Number of electors per councillor	Variance from average %
1	Astwell	1	1,523	1,523	3	1,639	1,639	4
2	Brafield & Yardley	2	3,311	1,656	12	3,415	1,708	8
3	Blakesley & Cote	2	2,724	1,362	-8	2,834	1,417	-10
4	Blisworth & Roade	2	3,299	1,650	11	3,336	1,668	5
5	Brackley East	2	3,296	1,648	11	3,440	1,720	9
6	Brackley South	2	2,950	1,475	-1	3,381	1,691	7
7	Brackley West	2	3,135	1,568	6	3,227	1,614	2
8	Cosgrove & Grafton	1	1,533	1,533	3	1,615	1,615	2
9	Danvers & Wardoun	2	2,883	1,442	-3	2,966	1,483	-6
10	Deanshanger	2	2,659	1,330	-10	3,060	1,530	-3
11	Downs & Heyford	2	3,442	1,721	16	3,457	1,729	9
12	Grange Park	2	1,712	856	-42	2,682	1,341	-15

Table 2 (continued): Final recommendations for South Northamptonshire district

	Ward name	Number of councillors	Electorate (2003)	Number of electors per councillor	Variance from average %	Electorate (2008)	Number of electors per councillor	Variance from average %
13	Hackleton	1	1,721	1,721	16	1,751	1,751	11
14	Harpole & Grange	2	3,595	1,798	21	3,629	1,815	15
15	Kings Sutton	1	1,603	1,603	8	1,682	1,682	6
16	Kingthorn	1	1,344	1,344	-9	1,391	1,391	-12
17	Little Brook	1	1,510	1,510	2	1,608	1,608	2
18	Middleton Cheney	2	3,003	1,502	1	3,048	1,524	-4
19	Old Stratford	1	1,355	1,355	-9	1,538	1,538	-3
20	Salcey	1	1,670	1,670	13	1,670	1,670	6
21	Silverstone	1	1,498	1,498	1	1,615	1,615	2
22	Steane	1	1,505	1,505	1	1,528	1,528	-3
23	Tove	1	1,430	1,430	-4	1,451	1,451	-8
24	Towcester Brook	3	4,371	1,457	-2	4,460	1,487	-6

Table 2 (continued): Final recommendations for South Northamptonshire district

	Ward name	Number of councillors	Electorate (2003)	Number of electors per councillor	Variance from average %	Electorate (2008)	Number of electors per councillor	Variance from average %
25	Towcester Mill	2	2,336	1,168	-21	2,950	1,475	-7
26	Whittlewood	1	1,583	1,583	7	1,634	1,634	3
27	Washington	1	1,337	1,337	-10	1,399	1,399	-12
	Totals	42	62,328	-	-	66,406	-	_
	Averages	_	_	1,484	-	_	1,581	_

Source: Electorate figures are based on information provided by South Northamptonshire Council.

Note: The 'variance from average' column shows by how far, in percentage terms, the number of electors per councillor in each ward varies from the average for the district. The minus symbol (-) denotes a lower than average number of electors. Figures have been rounded to the nearest whole number.

1 Introduction

- 1 This report contains our final recommendations for the electoral arrangements for the South Northamptonshire.
- 2 At its meeting on 12 February 2004 the Electoral Commission agreed that the Boundary Committee should make on-going assessments of electoral variances in all local authorities where the five-year forecast period following a periodic electoral review (PER) has elapsed. More specifically, it was agreed that there should be closer scrutiny where either:
- 30% of wards in an authority had electoral variances of over 10% from the average, or
- any single ward had a variance of more than 30% from the average
- 3 The intention of such scrutiny was to establish the reasons behind the continuing imbalances, to consider likely future trends, and to assess what action, if any, was appropriate to rectify the situation.
- 4 This is our first review of the electoral arrangements of South Northamptonshire. South Northamptonshire's last review was carried out by the Local Government Commission for England (LGCE), which reported to the Secretary of State in March 1997. An electoral change Order implementing the new electoral arrangements was made on 8 October 1998 and the first elections on the new arrangements took place in May 1999.
- 5 In carrying out our work, the Boundary Committee has to work within a statutory framework. This refers to the need to:
- reflect the identities and interests of local communities
- secure effective and convenient local government
- achieve equality of representation

In addition we are required to work within Schedule 11 to the Local Government Act 1972.

- 6 Details of the legislation under which the review of South Northamptonshire is being conducted are set out in a document entitled *Guidance and procedural advice for periodic electoral reviews* (published by the Electoral Commission in July 2002). This *Guidance* sets out the approach to the review and will be helpful in both understanding the approach taken by the Boundary Committee for England and in informing comments interested groups and individuals may wish to make about our recommendations.
- 7 Our task is to make recommendations to the Electoral Commission on the number of councillors who should serve on a council, and the number, boundaries and names of wards. We can also propose changes to the electoral arrangements for any parish and town councils in the district. We cannot consider changes to the external boundaries of either the district or of parish areas as part of this review.

¹ As set out in section 13(5) of the Local Government Act 1992 (as amended by SI 2001 No. 3962).

- 8 The broad objective of an electoral review is to achieve, as far as possible, equal representation across the district as a whole, i.e. that all councillors in the local authority represent similar numbers of electors. Schemes which would result in, or retain, an electoral imbalance of over 10% in any ward will have to be fully justified. Any imbalances of 20% or more should only arise in the most exceptional circumstances, and will require the strongest justification.
- 9 Electoral equality, in the sense of each elector in a local authority having a 'vote of equal weight' when it comes to the election of councillors, is a fundamental democratic principle. Accordingly, the objective of an electoral review is to ensure that the number of electors represented by each councillor is, as near as is possible, the same across a district. In practice, each councillor cannot represent exactly the same number of electors given geographic and other constraints, including the make up and distribution of communities. However, our aim in any review is to recommend wards that are as close to the district average as possible in terms of the number of electors per councillor, while also taking account of evidence in relation to community identity and effective and convenient local government.
- 10 We are not prescriptive about council size and acknowledge that there are valid reasons for variations between local authorities. However, we believe that any proposals relating to council size, whether these are for an increase, a reduction, or the retention of the existing size, should be supported by strong evidence and arguments. Indeed, we believe that consideration of the appropriate council size is the starting point for our reviews and whatever size of council is proposed to us should be developed and argued in the context of the authority's internal political management structures, put in place following the Local Government Act 2000. It should also reflect the changing role of councillors in the new structure.
- 11 As indicated in its *Guidance*, the Electoral Commission requires the decision on council size to be based on an overall view about what is right for the particular authority and not just by addressing any imbalances in small areas of the authority by simply adding or removing councillors from these areas. While we will consider ways of achieving the correct allocation of councillors between, say, a number of towns in an authority or between rural and urban areas, our starting point must always be that the recommended council size reflects the authority's optimum political management arrangements and best provides for convenient and effective local government and that there is evidence for this.
- 12 In addition, we do not accept that an increase or decrease in the electorate of the authority should automatically result in a consequent increase or decrease in the number of councillors. Similarly, we do not accept that changes should be made to the size of a council simply to make it more consistent with the size of neighbouring or similarly sized authorities; the circumstances of one authority may be very different from that of another. We will seek to ensure that our recommended council size recognises all the factors and achieves a good allocation of councillors across the district.
- 13 Where multi-member wards are proposed, we believe that the number of councillors to be returned from each ward should not exceed three, other than in very exceptional circumstances. Numbers in excess of three could result in an

unacceptable dilution of accountability to the electorate and we have not, to date, prescribed any wards with more than three councillors.

14 The review is in four stages (see Table 3).

Table 3: Stages of the review

Stage	Stage starts	Description
One	3 August 2004	Submission of proposals to us
Two	16 November 2004	Our analysis and deliberation
Three	17 May 2005	Publication of draft recommendations and consultation on them
Four	9 August 2005	Analysis of submissions received and formulation of final recommendations

15 Stage One began on 3 August 2004, when we wrote to South Northamptonshire Council inviting proposals for future electoral arrangements. We also notified Northamptonshire Police Authority, parish and town councils in the district, Members of Parliament with constituency interests in the district, Members of the European Parliament for the East Midlands Region and the headquarters of the main political parties. We placed a notice in the local press, issued a press release and invited South Northamptonshire Council to publicise the review further. The closing date for receipt of representations, the end of Stage One, was 15 November 2004.

16 During Stage Two we considered all the submissions received during Stage One and prepared our draft recommendations.

17 Stage Three began on 17 May 2005 with the publication of the report *Draft* recommendations on the future electoral arrangements for South Northamptonshire in Northamptonshire, and ended on 8 August 2005.

18 During Stage Four we reconsidered the draft recommendations in the light of the Stage Three consultation, decided whether to modify them, and now submit final recommendations to the Commission. It is now for the Commission to accept, modify or reject our final recommendations. If the Commission accepts the recommendations, with or without modification, it will make an electoral changes Order. The Commission will determine when any changes come into effect.

Equal opportunities

19 In preparing this report the Boundary Committee has had regard to the general duty set out in section 71(1) of the Race Relations Act 1976 and the statutory Code of Practice on the Duty to Promote Race Equality (Commission for Racial Equality, May 2002), i.e. to have due regard to the need to:

- eliminate unlawful racial discrimination
- promote equality of opportunity
- promote good relations between people of different racial groups

National Parks, Areas of Outstanding Natural Beauty (AONB) and the Broads

20 The Boundary Committee has also had regard to:

- Section 11A(2) of the National Parks and Access to the Countryside Act 1949 (as inserted by section 62 of the Environment Act 1995). This states that, in exercising or performing any functions in relation to, or so as to affect, land in a National Park, any relevant authority shall have regard to the Park's purposes. If there is a conflict between those purposes, a relevant authority shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the Park.
- Section 85 of the Countryside and Rights of Way Act 2000. This states that, in exercising or performing any functions in relation to, or so as to affect, land in an AONB, a relevant authority shall have regard to the purpose of the AONB.
- Section 17A of the Norfolk and Suffolk Broads Act (as inserted by section 97
 Countryside and Rights of Way Act 2000). This states that, in exercising or
 performing any functions in relation to, or so as to affect, land in the Broads, a
 relevant authority shall have regard to the purposes of the Broads.

2 Current electoral arrangements

- 21 The district of South Northamptonshire is bounded by the counties of Buckinghamshire, Warwickshire and Oxfordshire, by the unitary authority Milton Keynes and by the local authorities of Daventry and Northampton. It is a predominantly rural district with two small market towns, Brackley and Towcester. The district has excellent road links which help serve the expanding residential and high technology business sectors in the area.
- 22 In early 2004 the Boundary Committee for England undertook initial research into electoral imbalances that have occurred in local authority areas where the five-year forecast period following a PER has elapsed. We noted that in December 2003 in South Northamptonshire 15 of its 31 wards (48%) varied by more than 10% from the district average. This is compared to seven wards (23%) forecast by 2001 to vary by more than 10% under the previous electoral review. We also noted that Courteenhall ward varied by 40% from the district average. Further research into the levels of electoral inequality did not suggest that the imbalances were likely to rectify themselves and as a result the Electoral Commission directed the Boundary Committee for England to undertake a review of the electoral arrangements of South Northamptonshire Council on 2 June 2004.
- 23 The electorate of the district is 62,328 (December 2003). The District Council presently has 42 members who are elected from 31 wards, five of which are relatively urban in Brackley and Towcester and the remainder being predominantly rural. There are 20 single-member wards and 11 two-member wards. The district is entirely parished and contains 79 parishes. The towns of Brackley and Towcester comprise 26% of the district's total electorate.
- 24 At present, each councillor represents an average of 1,484 electors, which the District Council forecasts will increase to 1,581 by the year 2008 if the present number of councillors is maintained. However, since the last electoral review, the number of electors per councillor in 15 of the 31 wards varies by more than 10% from the district average, two wards by more than 20% and one ward by more than 30%. The worst imbalance is in Courteenhall ward where the councillors represent 40% more electors than the district average.
- 25 To compare levels of electoral inequality between wards, we calculated the extent to which the number of electors per councillor in each ward varies from the district average in percentage terms. The district average is calculated by dividing the total electorate of the district 62,328 by the total number of councillors representing them on the council, currently 42. Therefore, the average number of electors per councillor is currently 1,484. For example, in Brackley East ward, currently represented by two councillors, there are currently 3,304 electors, therefore, each councillor represents, on average, 1,652 electors, 11% more than the current district average.

Table 4: Existing electoral arrangements in South Northamptonshire district

	Ward name	Number of councillors	Electorate (2003)	Number of electors per councillor	Variance from average %	Electorate (2008)	Number of electors per councillor	Variance from average %
1	Astwell	1	1,523	1,523	3	1,636	1,636	3
2	Blakesley	1	1,249	1,249	-16	1,309	1,309	-17
3	Blisworth	1	1,449	1,449	-2	1,444	1,444	-9
4	Brackley East	2	3,304	1,652	11	3,450	1,725	9
5	Brackley South	2	2,759	1,380	-7	3,188	1,594	1
6	Brackley West	2	3,318	1,659	12	3,410	1,705	8
7	Chase	2	2,557	1,279	-14	2,631	1,316	-17
8	Cogenhoe	1	1,163	1,163	-22	1,167	1,167	-26
9	Cosgrove	1	1,752	1,752	18	2,015	2,015	27
10	Cote	1	1,475	1,475	-1	1,525	1,525	-4
11	Courteenhall	2	4,146	2,073	40	5,163	2,582	63
12	Deanshanger	2	2,659	1,330	-10	3,060	1,530	-3
13	Downs	2	2,551	1,276	-14	2,567	1,284	-19

Table 4 (continued): Existing electoral arrangements in South Northamptonshire district

	Ward name	Number of councillors	Electorate (2003)	Number of electors per councillor	Variance from average %	Electorate (2008)	Number of electors per councillor	Variance from average %
14	Grafton	1	1,533	1,533	3	1,536	1,536	-3
15	Grange	1	1,316	1,316	-11	1,326	1,326	-16
16	Harpole	1	1,260	1,260	-15	1,273	1,273	-19
17	Heyford	1	1,326	1,326	-11	1,331	1,331	-16
18	Kings Sutton	1	1,603	1,603	8	1,682	1,682	6
19	Kingthorn	1	1,344	1,344	-9	1,391	1,391	-12
20	Little Brook	1	1,510	1,510	2	1,608	1,608	2
21	Middleton Cheney	2	3,003	1,502	1	3,048	1,524	-4
22	Salcey	1	1,382	1,382	-7	1,382	1,382	-13
23	Silverstone	1	1,498	1,498	1	1,615	1,615	2
24	Steane	1	1,505	1,505	1	1,528	1,528	-3
25	Tove	1	1,321	1,321	-11	1,341	1,341	-15
26	Towcester Brook	2	3,402	1,701	15	3,491	1,746	10

Table 4 (continued): Existing electoral arrangements in South Northamptonshire district

	Ward name	Number of councillors	Electorate (2003)	Number of electors per councillor	Variance from average %	Electorate (2008)	Number of electors per councillor	Variance from average %
27	Towcester Mill	2	3,305	1,653	11	3,919	1,960	24
28	Wardoun	2	2,883	1,442	-3	2,966	1,483	-6
29	Washington	1	1,337	1,337	-10	1,399	1,399	-12
30	Whittlewood	1	1,583	1,583	7	1,634	1,634	3
31	Yardley	1	1,312	1,312	-12	1,368	1,368	-13
	Totals	42	62,328	-	-	66,406	-	-
	Averages		-	1,484	_	-	1,581	

Source: Electorate figures are based on information provided by South Northamptonshire Council.

Note: The 'variance from average' column shows by how far, in percentage terms, the number of electors per councillor varies from the average for the district. The minus symbol (-) denotes a lower than average number of electors. For example, in 2003, electors in Cogenhoe ward were relatively over-represented by 22%, while electors in Courteenhall were significantly under-represented by 40%. Figures have been rounded to the nearest whole number.

3 Draft recommendations

26 During Stage One 11 submissions were received, including a district-wide scheme from South Northamptonshire Council. We also received representations from nine parish councils and one district councillor. In the light of these representations and the evidence available to us, we reached preliminary conclusions which were set out in our report, *Draft recommendations on the future electoral arrangements for South Northamptonshire in Northamptonshire.*

27 Our draft recommendations were based on South Northamptonshire Council's proposals, which achieved some improvement in electoral equality. However, we moved away from South Northamptonshire Council's proposals in a number of areas. We did not propose to adopt its proposed increase in council size from 42 to 43 because we were not convinced that there was any evidence to show how an increase of one councillor will improve the representational role of councillors. Nevertheless we considered that the District Council made a case, albeit limited, that there should not be a reduction in council size. In addition it was noted that a council size of 43 members does not provide a good allocation of councillors between the two the towns of Towcester and Brackley and the rural area, whereas a council size of 42 does. It is usually the case that electoral equality is difficult to achieve where areas are not allocated the right number of councillors. Therefore based on the evidence available we concluded that the statutory criteria would best be met by a council of 42 members.

28 Furthermore, we proposed our own ward patterns within the towns of Brackley and Towcester and the central and eastern rural areas of the district to improve electoral equality. We proposed that:

- South Northamptonshire Council should be served by 42 councillors, the same as at present, representing 27 wards, four fewer than at present.
- The boundaries of 20 of the existing wards should be modified, while 11 wards should retain their existing boundaries.
- There should be new warding arrangements for the parishes of Brackley and Towcester to reflect the proposed district wards.

29 Our proposals would result in significant improvements in electoral equality, with the number of electors per councillor in 17 of the 27 wards varying by no more than 10% from the district average. This level of electoral equality was forecast to improve further, with only five wards varying by more than 10% from the district average by 2008.

4 Responses to consultation

30 We received 31 representations during Stage Three, all of which may be inspected at both our offices and those of the District Council. Representations may also be viewed on our website at www.boundarycommittee.org.uk.

South Northamptonshire Council

31 The District Council objected to our proposals in the northern rural area of the district and the proposed two-member wards in the east and west rural areas. It resubmitted its Stage One proposals for these areas which it stated would better reflect community identities and secure effective and convenient local government.

Members of Parliament

32 Mr T. Bosworth MP (Daventry constituency) expressed his opposition to the principle of two-member wards and argued that the draft recommendations in the northern rural area of the district did not reflect community links. He expressed support for Councillor Kirkbride's alternative proposal for this area.

Parish and town councils

33 Representations were received from 22 parish and town councils. Ten parish councils supported the recommendations for their area, while 12 parish councils opposed the recommendations for their area. Two parish councils expressed their opposition to the proposed Grange Park ward.

34 Mid Northamptonshire Parishes opposed the draft recommendations for the northern rural area of the district.

Other representations

35 A further six representations were received from local councillors and a historical society. County Councillor Kirkbride (Bugbrooke electoral division) opposed the recommendations for the northern rural area of the district and put forward an alternative ward pattern. County Councillor Bromwich (Towcester electoral division) proposed to amend the boundary between the proposed Towcester Mill and Towcester Brook wards. Councillors Townsend and Jainu-Deen (Courteenhall ward) opposed the proposed Grange Park ward and put forward an alternative proposal. Councillor Sergison-Brooke (Wardoun ward) opposed the proposed Danvers & Wardoun ward. Councillor Hollowell (Cogenhoe ward) opposed the proposed Brafield & Yardley ward and proposed that the current Cogenhoe ward be retained.

36 Milton Malsor Historical Society opposed the proposed Grange Park ward for uniting rural and urban areas.

5 Analysis and final recommendations

37 We have now finalised our conclusions on the electoral arrangements for South Northamptonshire.

38 As described earlier, the prime aim in considering the most appropriate electoral arrangements for South Northamptonshire is to achieve electoral equality. In doing so we have regard to section 13(5) of the Local Government Act 1992 (as amended), with the need to:

- secure effective and convenient local government
- reflect the identities and interests of local communities
- secure the matters in respect of equality of representation referred to in paragraph 3(2)(a) of Schedule 11 to the Local Government Act 1972

39 Schedule 11 to the Local Government Act 1972 refers to the number of electors per councillor being 'as nearly as may be, the same in every ward of the district or borough'. In relation to Schedule 11, our recommendations are not intended to be based solely on existing electorate figures, but also on estimated changes in the number and distribution of local government electors likely to take place over the next five years. We must also have regard to the desirability of fixing clearly identifiable boundaries and to maintaining local ties.

40 In reality, the achievement of absolute electoral equality is unlikely to be attainable. There must be a degree of flexibility. However, our approach, in the context of the statutory criteria, is to keep variances to a minimum.

41 If electoral imbalances are to be minimised, the aim of electoral equality should be the starting point in any review. We therefore strongly recommend that, in formulating electoral schemes, local authorities and other interested parties should make electoral equality their starting point, and then make adjustments to reflect relevant factors such as community identity and interests. Five-year forecasts of changes in electorate should also be taken into account and we aim to recommend a scheme which provides improved electoral equality over this period.

42 The recommendations do not affect county, district or parish external boundaries, local taxes, or result in changes to postcodes. Nor is there any evidence that these recommendations will have an adverse effect on house prices, or car and house insurance premiums. Our proposals do not take account of parliamentary boundaries, and we are not, therefore, able to take into account any representations which are based on these issues.

Electorate figures

43 Since the start of the previous electoral review of South Northamptonshire in 1996 there has been a 13% increase in the electorate of the district. The District Council had expected growth in Brackley West, Deanshanger and Tove wards. However, between 1996 and 2003 there has been growth across the district. This has resulted in a knock-on effect across the district. The District Council submitted electorate forecasts for the year 2008, projecting an increase in the electorate of approximately 7% from 62,328 to 66,406 over the five-year period from 2003 to 2008. It expects most of the growth to be in Grange Park ward, although further growth is also

expected across the district. In order to prepare these forecasts, the District Council estimated rates and locations of housing development with regard to development plans, the expected rate of building over the five-year period and assumed occupancy rates.

- 44 During Stage One Gayton Parish Council questioned whether the electorate projections for 2008 were too conservative. It considered that Bugbrooke village was subject to the possible development of 100 new properties over the next 10 years. We sought further clarification from the District Council in respect of this potential development. It reiterated that it was content with the projections it had provided and considered any potential development would not be in place by 2008. We are therefore content to continue using the electorate figures based on the information provided by the District Council in its submission to us.
- 45 During Stage Three Bugbrooke Parish Council contended that the electorate projections 'would appear conservative', particularly as 10 new properties had been granted planning permission in the past 12 months. We sought the District Council's views on the Parish Council's arguments. It stated that it considered that its 'methodology is as robust as it could have been' and acknowledged 'that there will always be isolated cases where a few extra properties are built that were not foreseen', however, it took the view 'that other than in exceptional and significant circumstances [it considered] that a consistent application of the methodology across the district is the appropriate way for the electoral forecast' to be applied.

46 We recognise that forecasting electorates is difficult and, having considered the District Council's methodology and projected figures, we consider that they are the best estimates that could reasonably be made at this time.

Council size

47 South Northamptonshire Council presently has 42 members. The District Council proposed an increase in council size of one member to 43. However, we did not consider that it had supplied us with enough detailed discussion about how the District Council would operate under its proposed 43 members and requested further evidence in support of its proposal. In its supplementary submission the District Council stated that 42 members 'worked fairly well and provided effective and convenient local government' and that the proposed increase would 'perpetuate this effectiveness'. It considered that any decrease in the number of councillors would hinder the effective geographical coverage of the rural areas by councillors. It highlighted that an increase would enable Grange Park parish to be covered by a two-member ward.

48 We were not satisfied that this response allowed us to assess whether the proposed increase provided the best council size, so we requested more information. Specifically we requested argument and evidence demonstrating clearly why such an increase would enable the District Council to function more effectively than under the existing council size of 42, and why the larger council would provide for more effective and convenient local government. In a second supplementary submission the District Council acknowledged that while we were seeking evidence as to how the proposed council size impacted on matters relating to political management structures and the roles of councillors, its prime considerations were different. It looked at council size assessing the rural nature of the district and how it considered the effect of the geographical/transport linkages and representational role of

members related to effectively covering parishes. It therefore repeated much of what had been submitted previously, the starting point being the number of councillors who can each properly cover the area allocated to them in a ward.

49 Having considered all the information made available to us we were of the view that a case, albeit limited, has been made by the District Council that there should not be a reduction in council size. Indeed, the District Council makes much more of a positive argument for the retention of 42 members, with only the negative assertion that there should be no less than 43 members, as this would make it difficult for the members 'to represent the electorate at [a] local level'. We have not been convinced that there is any evidence to show how an increase of one councillor will improve the representational role of councillors.

50 We also noted that under the proposed council size of 43 members it was not possible to provide for a good allocation of councillors to the towns of Towcester and Brackley and to the rural area. With the towns of Brackley and Towcester being quite discrete in relation to the rural hinterlands around them we did not consider that the statutory criteria would be well reflected by combining parts of the towns with the surrounding rural areas. We noted that the District Council's ward pattern, which did not mix the urban and rural areas, was not viable if the correct allocation of councillors was to be achieved. Based on the electorate totals and councillor:elector ratio, under a council size of 43, Brackley, Towcester and the rural areas would merit seven, five and 32 councillors respectively, a total of 44 councillors, whereas the District Council allocated six, four and 33 councillors respectively.

51 In contrast a council size of 42 would provide a good allocation of six, five and 31 members for the towns of Brackley, Towcester and the rural areas respectively. Therefore, under a council size of 43 members it is not possible to provide for the correct allocation of councillors. It is usually the case that electoral equality is difficult to achieve where areas are not allocated the right number of councillors. Based on the evidence available, we therefore proposed retaining the present council size of 42 members.

52 At Stage Three Councillors Townsend and Jainu-Deen, in a joint submission, recommended that the Committee consider a council size of 44 to facilitate their proposal for a two-member Grange Park ward and a two-member Courteenhall ward. Mid-Northamptonshire Parishes expressed its support for a council size of 43 to provide for a warding pattern for the parishes of Roade, Courteenhall, Blisworth, Milton Malsor, Gayton and Grange Park.

53 However, as explained in paragraphs 10 and 11, we believe that a proposed council size should be developed and argued in the context of the authority's internal political management structures and the changing roles of councillors. A proposal should not focus on addressing electoral imbalances in particular areas of an authority. Therefore, we do not propose to adopt Councillors Townsend and Jainu-Deen's or Mid-Northamptonshire Parishes' proposal to increase council size.

Electoral equality

54 Electoral equality, in the sense of each elector in a local authority having a vote of equal weight when it comes to the election of councillors, is a fundamental democratic principle. The Electoral Commission expects the Boundary Committee's recommendations to provide for high levels of electoral equality, with variances

normally well below 10%. However, when making recommendations we will not simply aim for electoral variances of under 10%. Where no justification is provided for specific ward proposals we will look to improve electoral equality seeking to ensure that each councillor represents as close to the same number of electors as is possible, providing this can be achieved without compromising the reflection of the identities and interests of local communities and securing effective and convenient local government. We take the view that any proposals that would result in, or retain, electoral imbalances of over 10% from the average in any ward will have to be fully justified, and evidence provided which would justify such imbalances in terms of community identity or effective and convenient local government. We will rarely recommend wards with electoral variances of 20% or more, and any such variances proposed by local interested parties will require the strongest justification in terms of the other two statutory criteria.

55 Our proposed Brafield & Yardley, Bliswroth & Roade, Brackley East, Downs & Heyford, Salcey and Towcester Mill wards will have variances of more than 10%, but these are projected to improve by 2008. Our proposed Grange Park and Harpole & Grange wards would have variances of more than 10% by 2008, but we consider that these variances are justified by the level of evidence of community identity we have received, while we consider our proposed Hackleton, Kingthorn and Washington wards provide a good level of electoral equality given our recommendations elsewhere.

General analysis

- 56 Our draft recommendations were based on the proposals of South Northamptonshire Council, which achieved some improvement in electoral equality. However, where we were not convinced by the supporting argument and evidence that the levels of electoral equality were justified we moved away from South Northamptonshire Council's proposals and recommended our own ward patterns to provide for a good balance between the statutory criteria.
- 57 Three broad issues concerned the majority of the respondents during Stage Three: our proposed Grange Park ward; our recommendations in the northern rural area of the district; and our proposed two-member rural wards.
- 58 With regard to the proposed Grange Park ward respondents were concerned that it would unite rural and relatively urban areas and argued that the areas should be separated within a warding pattern. Based on the level of supporting evidence explaining the distinct urban characteristics of Grange Park parish and how this divides its community identity and interest from its rural neighbours we propose to move away from our draft recommendations for this area.
- 59 Respondents opposed our recommendations in the northern rural area of the district for uniting unrelated communities and there was a general consensus for the existing arrangements to be retained. However, we were not persuaded that there was sufficient evidence to justify the high levels of electoral equality produced by the existing ward pattern.
- 60 With regard to our proposed rural two-member wards respondents broadly argued that single-member wards would provide better conditions for effective and convenient local government and would better reflect community identities and interests. The District Council expressed its view that the Committee in producing its

draft recommendations has conducted 'a numeric exercise', which has 'resulted in unrelated parishes and communities being lumped together merely because a greater number of electors divided by two ... is mathematically easier than recognising that one member wards, perhaps with some electoral imbalance, nonetheless provide more effective local government and secure better community ties'. Mr Boswell MP argued that 'communities prefer a link with one councillor' and that two-member wards 'are difficult to manage in a very rural district' and can lead to 'an unnecessary duplication of work'.

61 We do not consider that there is conclusive evidence to suggest that single-member wards are more likely to provide the conditions for effective and convenient local government and automatically provide a better reflection of communities in comparison to two-member wards. Therefore, where we consider there is insufficient justification for high levels of electoral equality we will examine options and put forward recommendations for both single- and two-member ward patterns to improve electoral equality. It is the case that we will consider arguments and evidence why a proposed ward will hinder effective and convenient local government and whether an alternative pattern will provide a better reflection of communities, but this must be balanced with the need to achieve electoral equality. We have considered the opposition to our draft recommendations for two-member rural wards and the arguments and evidence in support of locally proposed alternative single-member ward patterns, but we have not been convinced by the evidence submitted to adopt the resulting high levels of electoral inequality.

Warding arrangements

62 For district warding purposes, the following areas, based on existing wards, are considered in turn:

- Astwell, Kings Sutton, Little Brook, Middleton Cheney and Steane wards (page 31)
- Brackley East, Brackley West and Brackley South wards (page 32)
- Blakesley, Cote, Kingthorn, Wardoun and Washington wards (page 33)
- Blisworth, Courteenhall, Downs, Grange, Harpole and Heyford wards (page 34)
- Cosgrove, Deanshanger, Grafton, Silverstone, Tove and Whittlewood wards (page 37)
- Towcester Brook and Towcester Mill wards (page 38)
- Chase, Cogenhoe, Salcey and Yardley wards (page 39)

63 Details of our final recommendations are set out in Tables 1 and 2 (on pages 9 and 12, respectively), and illustrated on the large maps accompanying this report.

Astwell, Kings Sutton, Little Brook, Middleton Cheney, Steane, wards

64 Under the existing arrangements Astwell ward comprises the parishes of Helmdon, Radstone, Syresham and Whitfield. Kings Sutton ward comprises the parish of Kings Sutton. Little Brook ward comprises the parishes of Aynho, Croughton and Evenley. Middleton Cheney ward comprises the parishes of Middleton Cheney, Warkworth and Overthorpe. Steane ward comprises the parishes of Farthinghoe, Greatworth, Hinton-in-the Hedges and Newbottle parishes. Table 4 (page 20) outlines the existing electoral variances for 2003 and also the variances

which the wards are forecast to have by 2008 if the existing arrangements remained in place.

- 65 At Stage One the District Council proposed to retain the current Astwell, Kings Sutton, Little Brook, Middleton Cheney and Steane wards, but provided little supporting evidence or argument. Nonetheless we adopted the District Council's proposals due to the good level of electoral equality provided by these proposed wards.
- 66 Under our draft recommendations the proposed Astwell, Kings Sutton, Little Brook, Middleton Cheney and Steane wards would have 4% more, 6% more, 2% more, 4% fewer and 3% fewer electors per councillor than the district average by 2008.
- 67 We did not receive any submissions regarding these proposed wards during Stage Three and, therefore, we have decided to endorse the draft recommendations for this area.
- 68 Tables 1 and 2 (on pages 9 and 12, respectively) provide details of the constituent parts and electoral variances of our final recommendations for Astwell, Kings Sutton, Little Brook, Middleton Cheney and Steane wards. Our final recommendations are shown on Map 1 accompanying this report.

Brackley East, Brackley South and Brackley West wards

- 69 Under the existing arrangements Brackley East ward comprises East parish ward of Brackley parish. Brackley South ward comprises South parish ward of Brackley parish. Brackley West ward comprises West parish ward of Brackley parish. Table 4 (page 20) outlines the existing electoral variances for 2003 and also the variances which the wards are forecast to have by 2008 if the existing arrangements remained in place.
- 70 We received two submissions in relation to this area during Stage One. Both the District Council and Brackley Town Council proposed to retain the existing arrangements in the town, but did not provide any supporting evidence or argument.
- 71 Given the lack of evidence available to us we examined options to improve the levels of electoral equality. We noted that due to the town's entitlement to 6.35 councillors under a council size of 42 it is not possible to significantly improve electoral equality in the town. Nonetheless we sought to provide for more identifiable boundaries and proposed to transfer the area east of Bridge Street up to Buckingham Road in the south of the town into Brackley South ward and to transfer all the properties along Halse Road into Brackley East ward from both Brackley South and Brackley West wards.
- 72 Under our draft recommendations the proposed Brackley East, Brackley South and Brackley West wards would have 9%, 7% and 2% more electors per councillor than the district average by 2008.
- 73 During Stage Three the District Council proposed a minor amendment to the boundary between the proposed Brackley East and Brackley South wards to ensure that there is a polling station within the proposed Brackley East ward. It proposed that the boundary continue along the High Street until the junction with Banbury Road

where it would head eastwards behind the houses on Old Brewery Walk and Winston Crescent before rejoining the proposed boundary.

74 We have considered the District Council's proposal to amend the boundary. We do not have regard to the need to provide for a polling station in determining a warding pattern which reflects the statutory criteria. However, we consider that the modification would provide for a more identifiable boundary and we propose to adopt it as part of our final recommendations.

75 Tables 1 and 2 (on pages 9 and 12, respectively) provide details of the constituent parts and electoral variances of our final recommendations for Brackley East, Brackley South and Brackley West wards. Our final recommendations are shown on Map 1 and Map 3 accompanying this report.

Blakesley, Cote, Kingthorn, Wardoun and Washington wards

76 Under the existing arrangements Blakesley ward comprises the parishes of Adstone, Blakesley, Cold Higham, Litchborough, Maidford, Slapton and Woodend. Cote ward comprises the parishes of Pattishall and Tiffield. Kingthorn ward comprises the parishes of Bradden and Greens Norton. Wardoun ward comprises the parishes of Aston Le Walls, Boddington, Chacombe, Chipping Warden, Culworth, Edgcote, Eydon, Thenford, Marston St Lawrence and Thorpe Mandeville. Washington ward comprises the parishes of Abthorpe, Moreton Pinkney, Sulgrave, Wappenham and Weston & Weedon. Table 4 (page 20) outlines the existing electoral variances for 2003 and also the variances which the wards are forecast to have by 2008 if the existing arrangements remained in place.

77 At Stage One the District Council proposed to retain the existing Blakesley, Cote, Kingthorn and Washington wards. It proposed to divide the existing Wardoun ward to comprise two new single-member wards named Danvers and Wardoun. Its proposed Danvers ward would comprise the parishes of Chacombe, Culworth, Edgcote, Thenford, Thorpe Mandeville and Marston St Lawrence. Its proposed Wardoun ward would comprise the parishes of Aston le Walls, Boddington, Chipping Warden and Eydon. It argued that the geographical size and the number of parishes comprising the current Wardoun ward constrains the ability of the two councillors to undertake an effective representational role. Councillor Sergison-Brooke also expressed this view.

78 We carefully examined this proposal. We noted that the District Council's proposed Blakesley, Danvers, Kingthorn, and Washington wards would have variances of 10% or more by 2008 and considered that there was insufficient supporting evidence to justify this level of electoral equality. To provide for improved levels of electoral equality we proposed to retain the current two-member Wardoun ward but to rename it Danvers & Wardoun ward and to combine the existing Blakesley ward and Cote ward to comprise a new two-member Blakesley & Cote ward. We considered alternative options to address the level of electoral equality in both Kingthorn and Washington wards, but could not identify a configuration in light of our recommendations elsewhere and, therefore, proposed to adopt the District Council's proposal to retain both wards.

79 Under our draft recommendations the proposed Blakesley & Cote, Danvers & Wardoun, Kingthorn and Washington wards would have 10% fewer, 6% fewer, 12% fewer and 12% fewer electors per councillor than the district average by 2008.

- 80 At Stage Three the District Council opposed the proposed two-member Blakesley & Cote ward arguing that it has no regard 'to the effect on democratic local government and the ability of members to fulfil their duties with maximum effectiveness'. It expressed its disappointment with the proposed Danvers & Wardoun ward considering the level of evidence showing that its size hindered the current members' ability to exercise an effective representational role. It resubmitted its proposal for two single-member wards as this would ensure 'workload for each [ward] would diminish extensively thereby improving representation and effective local government'.
- 81 Councillor Sergison-Brooke opposed the proposed Danvers & Wardoun ward because its size hinders each councillor's ability to exercise an effective representational role because 'two-member wards double the workload' in terms of maintaining a close relationship with electors and parish councils.
- 82 Pattishall Parish Council argued that the proposed Blakesley & Cote ward 'would significantly reduce the [Parish] Council's representation at both District and County leve and would adversely affect the parish electorate'. Maidford Parish Council expressed its 'agreement with the recommendations'.
- 83 Having considered the representations received we have decided to endorse the draft recommendations for Blakesley & Cote, Danvers & Wardoun, Kingthorn and Washington wards. We have considered the arguments put forward opposing the proposed two-member Danvers & Wardoun and Blakesley & Cote wards but note that the alternative proposals for a new Danvers ward and to retain Blakesley ward would result in electoral variances of -16% and -17% respectively by 2008. We do not consider respondents have submitted sufficient evidence regarding community identities and interests to justify this level of electoral inequality. Nor do we consider that there is conclusive evidence to indicate that two members will not be able to provide effective representation for their electorate.
- 84 Tables 1 and 2 (on pages 9 and 12, respectively) provide details of the constituent parts and electoral variances of our final recommendations for Blakesley & Cote, Danvers & Wardoun, Kingthorn and Washington wards. Our final recommendations are shown on Map 1 accompanying this report.

Blisworth, Courteenhall, Downs, Grange, Harpole and Heyford wards

85 Under the current arrangements Blisworth ward comprises Blisworth parish. Courteenhall ward comprises the parishes of Courteenhall, Grange Park, Milton Malsor and Roade. Downs ward comprises the parishes of Bugbrooke and Gayton. Grange ward comprises the parishes of Kislingbury and Rothersthorpe. Harpole ward comprises Harpole parish. Heyford ward comprises the parishes of Nether Heyford and Upper Heyford. Kings Sutton ward comprises Kings Sutton parish. Table 4 (page 20) outlines the existing electoral variances for 2003 and also the variances which the wards are forecast to have by 2008 if the existing arrangements remained in place.

86 The District Council proposed to retain Blisworth, Downs, Grange, Harpole, and Heyford wards arguing that the existing ward pattern provides a good reflection of topographical features, particularly the A5, and community identities and interests. It put forward an amended Courteenhall ward comprising the parishes of Courteenhall,

Milton Malsor and Roade, which enabled its proposal for a new two-member Grange Park ward comprising the parish of the same name. It argued that Grange Park parish was 'a rapidly growing development, and that 'the nature and location of Grange Park [parish] makes it very much a stand alone parish and it would be incongruous to combine it with any of the neighbouring very rural parishes'.

87 Harpole Parish Council and Gayton Parish Council proposed to retain the current arrangements for their areas. Milton Malsor Parish Council stated it has more in common with Blisworth and Stoke Bruerne parishes than Roade parish. It proposed that Grange Park parish wholly comprise a new district ward. Roade Parish Council proposed that it wholly comprise a new district ward.

88 We considered the representations and the proposals we had received. We noted the arguments put forward by the parish councils of Milton Malsor and Roade. However, their proposals resulted in high levels of electoral inequality which we did not consider had been justified by sufficient evidence. We carefully considered the District Council's proposals, but we were not persuaded that the level of argument and evidence justified the high levels of electoral inequality secured by the existing ward pattern and we considered alternative options to improve electoral equality. As a result we proposed a different configuration of wards. We proposed combining the existing Heyford ward with Bugbrooke parish in a new two-member Downs & Heyford ward. We proposed a new two-member Harpole & Grange ward combining the parishes of Harpole, Kislingbury, Rothersthorpe and Gayton. We considered that this ward would provide for a good level of electoral equality while combining areas with good access between their respective settlements. We proposed modifying the District Council's proposed two-member Grange Park ward by including the parishes of Courteenhall and Milton Malsor. We proposed combining the parishes of Blisworth and Roade to comprise a new two-member Blisworth & Roade ward.

89 Under our draft recommendations the proposed Blisworth & Roade, Downs & Heyford, Grange Park and Harpole & Grange wards would have 3% more, 9% more, 6% more and 4% fewer electors per councillor than the district average by 2008.

90 There was significant opposition to the proposed Downs & Heyford, Grange Park and Harpole & Grange wards during Stage Three. The opposition to the proposed Grange Park ward focused on the combination of Milton Malsor parish and Courteenhall parish with Grange Park parish. Respondents explained the dissimilarities between these areas due to the difference in their rural and urban characteristics. They described Grange Park parish as a growing urban development resulting in a self contained community, which should be viewed as an urban extension to Northampton, with its own community services. In contrast it was argued that the parishes of Milton Malsor and Courteenhall are rural villages. Consequently the parishes' diverging interests would be better represented if Grange Park parish solely comprised a two-member district ward and the parishes of Milton Malsor and Courteenhall were to unite with neighbouring rural parishes, with which they share similarities and interests.

91 Respondents were united in their view that Grange Park parish should soley comprise a new two-member district ward, which would result in a variance of -15% by 2008. The District Council proposed to transfer Milton Malsor parish to the proposed Harpole & Grange ward and Courteenhall parish to the proposed Hackleton ward, which would result in variances of 15% and 16% more than the district average respectively by 2008. Milton Malsor Parish Council stated that it

'should be linked with neighbouring rural parishes such as Blisworth, Gayton, Roade, or Rothersthorpe with whom it has a long standing working relationship'. Courteenhall Parish Meeting stated that the parish 'should be bound to such villages as Miton Malsor and Roade whose inhabitants have similar problems'.

- 92 The opposition to the proposed Downs & Heyford and Harpole & Grange wards was generally based on the view that the proposed wards grouped together unrelated communities and that the parishes of Nether Heyford and Upper Heyford, and Harpole parish are independent communities best reflected by separate single-member representation. Respondents also put forward the argument that Bugbrooke parish would dominate Nether Heyford and Upper Heyford parishes within the proposed Downs & Heyford ward due to the size of its electorate.
- 93 County Councillor Kirkbride put forward an alternative proposal for two new district wards. One ward would comprise the parishes of Nether Heyford, Upper Heyford, Harpole and Kislingbury, which are 'similar in size', are linked by the A45 and have worked together as "Friends of the Upper Nene" 'to deal with potential future flooding problems'. The other ward would comprise the parishes of Bugbrooke, Gayton and Rothersthorpe, which would reflect the current link between the parishes of Bugbrooke and Gayton within the current Downs ward and as the village of Rothersthorpe 'has no shops [it] may benefit from a link to a larger community'. Mr Boswell MP supported County Councillor Kirkbride's proposal.
- 94 Rothersthorpe Parish Council expressed its preference for the existing arrangements, but explained that it was 'prepared to accept' the proposed Harpole & Grange ward. It highlighted that it would oppose a link with Bugbrooke parish contending it would be dominated by the larger village. Harpole Parish Council considered the proposed Harpole & Grange ward 'would result in confusion and inefficiency' and that the existing Harpole ward should be retained. Kislingbury Parish Council expressed a preference for joining with the parishes of Rothersthorpe and Gayton 'who have similar concerns and problems and with whom [the parish council] has worked with on a variety of matters'.
- 95 Roade Parish Council expressed its support for the proposed Blisworth & Roade ward and objected to the proposed Grange Park ward.
- 96 We have carefully considered the representations received for this area. We have examined the evidence supporting the proposal for Grange Park parish to solely comprise a new two-member Grange Park ward. We were convinced by the detailed evidenced showing Grange Park parish as an urban community with a distinct identity, which separates it from the surrounding rural communities, and we were persuaded by the argument that this should be reflected in a specific ward. Consequently, we consider that the deterioration in electoral equality is justified by the substantial improvement in the reflection of community identities and interests created by separating the parishes of Milton Malsor and Courteenhall from Grange Park parish. Therefore, we propose to adopt the proposed two-member Grange Park ward as part of our final recommendations.
- 97 We note the opposition to the proposed Harpole & Grange and Downs & Heyford wards and consider that there is a general consensus for the existing arrangements to be retained as this would provide the best reflection of community identities and interests. However, we note that the existing wards of Downs, Grange, Harpole, Heyford would have 19% fewer, 16% fewer, 19% fewer, 16% fewer electors per

councillor than the district average by 2008. We do not consider that sufficient evidence has been provided to justify this level of electoral inequality. We have considered Councillor Kirkbride's alternative proposal, but we note that it does not reflect the submissions from Kislingbury, Rothersthorpe and Harpole parishes and are, therefore, reluctant to adopt it as we are not convinced it would reflect community identities.

98 Therefore, we propose to endorse the draft recommendation for Downs & Heyford ward, and for Harpole & Grange and Blisworth & Roade wards subject to amendments to accommodate transferring the parishes of Milton Malsor and Courteenhall. We propose to adopt the District Council's proposal to transfer Milton Malsor parish to the proposed Harpole & Grange ward and we propose to transfer Courteenhall parish to the proposed Blisworth & Roade ward in light of the Parish Meeting's request to be linked with Roade parish.

99 Tables 1 and 2 (on pages 9 and 12, respectively) provide details of the constituent parts and electoral variances of our final recommendations for Blisworth & Roade, Downs & Heyford, Grange Park and Harpole & Grange wards. Our final recommendations are shown on Map 1 accompanying this report.

Cosgrove, Deanshanger, Grafton, Silverstone, Tove and Whittlewood wards

Under the current arrangements Cosgrove ward comprises the parishes of Cosgrove and Old Stratford. Deanshanger ward comprises the parishes of Deanshanger and Wicken. Grafton ward comprises the parishes of Alderton, Grafton Regis, Yardley Gobion and Ashton. Silverstone ward comprises Silverstone parish. Tove ward comprises the parishes of Paulerspury, Stoke Bruerne and Shutlanger. Whittlewood ward comprises the parishes of Potterspury and Whittlebury. Table 4 (page 20) outlines the existing electoral variances for 2003 and also the variances which the wards are forecast to have by 2008 if the existing arrangements remained in place.

101 The District Council proposed to retain the existing Cosgrove, Deanshanger, Grafton, Silverstone, Tove and Whittlewood wards.

102 Stoke Bruerne Parish Council proposed to retain the existing Tove ward. Yardley Gobion Parish Council proposed to combine with Potterspury parish to comprise a new Moor End ward, to retain the existing Deanshanger and Cosgrove wards, to combine the parishes of Whittlebury and Silverstone and to combine the parishes of Grafton Regis, Alderton, Ashton and Hartwell.

103 We carefully considered the representations made in this area. We noted that Yardley Gobion Parish Council's proposed Moor End ward would have a variance of more than 20% by 2008 and concluded this was not justified by the level of supporting evidence.

104 We adopted the District Council's proposal to retain the existing Deanshanger, Silverstone and Whittlewood wards as they secured good levels of electoral equality. However, as retaining the existing Cosgrove and Tove wards would result in high levels of electoral inequality we proposed an amended Tove ward comprising the parishes of Alderton, Shutlanger, Paulerspury and Stoke Bruerne, a new singlemember Cosgrove & Grafton ward comprising the parishes of Cosgrove, Grafton

Regis and Yardley Gobion and a new single-member Old Stratford ward comprising the parish of the same name.

- 105 Under our draft recommendations the proposed Cosgrove & Grafton Deanshanger, Old Stratford, Silverstone, Tove and Whittlewood wards would have 2% more, 3% fewer, 3% fewer, 2% more, 8% fewer and 3% more fewer electors per councillor than the district average by 2008.
- 106 At Stage Three Hartwell Parish Council stated that it was 'happy with the proposals'. Grafton Regis Parish Meeting and Cosgrove Parish Council expressed their support for the proposed Cosgrove & Grafton ward. Alderton Parish Meeting supported the proposed Tove ward as this reflected its links and shared interests with Paulerspury parish. Stoke Bruerne Parish Council stated that it had 'no objections' to the proposed Tove ward, but highlighted that 'there are no public transport links between all [the] four [comprising] villages'.
- 107 In view of this support we have decided to endorse the draft recommendations for the proposed Cosgrove & Grafton, Deanshanger, Old Stratford, Silverstone, Tove and Whittlewood wards.
- 108 Tables 1 and 2 (on pages 9 and 12, respectively) provide details of the constituent parts and electoral variances of our final recommendations for Cosgrove & Grafton, Deanshanger, Old Stratford, Silverstone, Tove and Whittlewood wards. Our final recommendations are shown on Map 1 accompanying this report.

Towcester Brook and Towcester Mill wards

- 109 Under the current arrangements Towcester Mill ward comprises Mill parish ward of Towcester parish and Easton Neston parish. Towcester Brook ward comprises Brook parish ward of Towcester parish. Table 4 (page 20) outlines the existing electoral variances for 2003 and also the variances which the wards are forecast to have by 2008 if the existing arrangements remained in place.
- 110 The District Council proposed an amendment to the boundary between Towcester Brook and Towcester Mill wards along Bickerstaffes Road, Haresmoor Drive and Hesketh Crescent, with 109 electors being moved from the latter ward to the former. The proposed Towcester Brook and Towcester Mill wards would have electoral variances of 17% and 23% respectively by 2008.
- 111 However, Towcester, under a council size of 42, is entitled to five councillors, one more than at present. Consequently, we examined a number of warding options to provide for the correct allocation of councillors and good level of electoral equality. We looked at dividing the town between two wards along Silverstone Brook, but we did not consider that this would best reflect community identity links. Similarly we were not convinced that dividing the town centre area between wards would provide for the best reflection of the statutory criteria.
- 112 Therefore, we proposed to transfer the areas broadly south of Silverstone Brook and west of Islington Road and Roman Road from the existing Towcester Mill ward to comprise part of an amended Towcester Brook ward. Furthermore we proposed that both sides of Brackley Road comprise part of an amended Towcester Mill ward.

- 113 Under our draft recommendations the proposed Towcester Brook and Towcester Mill wards would have 6% fewer and 7% fewer electors per councillor than the district average by 2008.
- 114 At Stage Three Towcester Town Council stated that it had 'no objections to the draft proposals'. County Councillor Bromwich supported the boundary between the proposed Towcester Brook and Towcester Mill wards subject to one amendment. She proposed that Islington Road comprise part of the proposed Towcester Mill ward 'so that both St Lawrence CE Junior School and Towcester Infants School are seen to be part of [Towcester] Mill ward' and to reflect that this area 'has always been part of the town, rather than the newer development'. She argued that allocating the proposed Towcester Brook ward an additional councillor would not provide 'any better representation' and 'could lead to duplication of work, and confusion for residents'.
- 115 Having considered the representations received we have decided to endorse the draft recommendations for Towcester Brook and Towcester Mill wards. We have considered the proposals put forward by County Councillor Bromwich, but, we have not been sufficiently persuaded by the argument received and in view of the support for the recommendations from the Town Council we do not propose to adopt them. We note County Councillor Bromwich's views regarding the proposed three-member Towcester Brook ward, but we would highlight that this ensures that Towcester receives the number of councillors to which it is entitled to.
- 116 Tables 1 and 2 (on pages 9 and 12, respectively) provide details of the constituent parts and electoral variances of our final recommendations for Towcester Brook and Towcester Mill wards. Our final recommendations are shown on Map 1 and Map 2 accompanying this report.

Chase, Cogenhoe, Salcey and Yardley wards

- 117 Under the current arrangements, Chase ward comprises the parishes of Brafield-on-the-Green, Hackleton, Little Houghton and Quinton. Cogenhoe ward comprises the parish of Cogenhoe & Whiston. Salcey ward comprises Hartwell parish. Yardley ward comprises the parishes of Castle Ashby, Denton and Yardley Hastings. Table 4 (page 20) outlines the existing electoral variances for 2003 and also the variances which the wards are forecast to have by 2008 if the existing arrangements remained in place.
- 118 The District Council proposed three new wards of Brafield, Hackleton and Yardley and proposed the retention of the present Salcey ward. It proposed that Brafield ward comprise Brafield-on-the Green, Denton and Little Houghton parishes and that Hackleton ward comprise Hackleton and Quinton parishes. It proposed that Yardley ward comprise Castle Ashby, Cogenhoe & Whiston and Yardley Hastings parishes.
- 119 We noted that the District Council's proposals would result in three of the four proposed wards having a variance of more than 10% by 2008 and we were not convinced that adopting its ward pattern would provide the best balance of the statutory criteria. While we noted the community identity arguments put to us we must balance this against the need to secure electoral equality.

- 120 We proposed to adopt the District Council's proposed Hackleton ward as we note that although it secures an electoral variance of 11% by 2008 the parishes are well linked and alternative options are limited. To improve electoral equality we proposed three new district wards. We proposed combining the District Council's Brafield and Yardley wards to form a two-member Brafield & Yardley ward. We proposed combining the parishes of Ashton and Hartwell in a new single-member Salcey ward.
- 121 Under our draft recommendations the proposed Brafield & Yardley, Hackleton and Salcey wards would have 8% more, 11% more and 6% more electors per councillor than the district average by 2008.
- 122 At Stage Three the District Council expressed its view that the proposed twomember Brafield & Yardley ward achieves a good level of electoral equality 'to the detriment of effective and convenient local government'. It contended that 'two-single member wards will provide a situation that is better for both the councillors and the electorate that they represent' and resubmitted its Stage One proposal. It argued that the high level of electoral equality secured by its proposed Yardley ward (19% more electors per councillor than the district average by 2008) was justified because a single councillor 'would effectively have less workload, and therefore provide better representation'.
- 123 Cogenhoe & Whiston Parish Council and Denton Parish Council expressed their concern that the size of the proposed Brafield & Yardley ward would significantly reduce their parish's representation at both District and County level and would adversely affect their electorate. Cogenhoe & Whiston and Castle Ashby Parish Councils put forward an alternative proposal to combine the parishes of Cogenhoe & Whiston, Brafield-on-the-Green and Little Houghton (which would secure a variance of 29% more electors per councillor than the district average by 2008) and to retain the existing Yardley ward as this would combine parishes with similar concerns and interests. Denton Parish Council proposed no change to the current warding arrangements. Yardley Hastings Parish Council contended that it 'shares little with Cogenhoe and Little Houghton [parishes]', while a two-member ward will 'involve an increase workload for district councillors'. Little Houghton Parish Council expressed its preference for a single-member ward pattern, but did not put forward a specific proposal. Quinton Parish Council requested that 'the parish be in a ward with Hackleton [parish]'.
- 124 Councillor Hollowell considered that placing Cogenhoe & Whiston parish within a new two-member ward would mean that 'democratic representation will be considerably reduced despite the constantly rising population'. He argued that uniting villages of varying sizes will mean that it will 'become almost impossible for the smaller village to field successful candidates at election time'. He proposed that the existing Cogenhoe ward is retained.
- 125 Having considered the representations received we have decided to endorse the draft recommendations for Brafield & Yardley, Hackleton and Salcey wards. We have considered the opposition to the proposed Brafield & Yardley ward and the alternative proposals put forward. We note the District Council's proposed Yardley ward and the parish councils' proposed grouping of Cogenhoe & Whiston, Brafield-on-the-Green and Little Houghton parishes would have significantly high levels of electoral inequality. We consider that the respondents have not provided sufficient evidence of community identities to justify these levels of electoral inequality. Nor do

we consider that the respondents have provided convincing evidence to indicate that two members will be unable to ensure effective representation for the proposed Brafield & Yardley ward. As discussed in paragraph 61, we do not consider that there is conclusive evidence to suggest that single-member wards are more likely to provide the conditions for effective and convenient local government and automatically provide a better reflection of communities in comparison to two-member wards.

126 Tables 1 and 2 (on pages 9 and 12, respectively) provide details of the constituent parts and electoral variances of our final recommendations for Brafield & Yardley, Hackleton and Salcey wards. Our final recommendations are shown on Map 1 accompanying this report.

Conclusions

127 Table 5 shows the impact of our final recommendations on electoral equality, comparing them with the current arrangements based on 2003 and 2008 electorate figures.

Table 5: Comparison of current and recommended electoral arrangements

	Current arrangements		Final recommendations	
	2003	2008	2003	2008
Number of councillors	42	42	42	42
Number of wards	31	31	27	27
Average number of electors per councillor	1,484	1,581	1,484	1,581
Number of wards with a variance more than 10% from the average	15	15	9	5
Number of wards with a variance more than 20% from the average	2	4	3	0

128 As shown in Table 5, our final recommendations for South Northamptonshire Council would result in a reduction in the number of wards with an electoral variance of more than 10% from 15 to nine. By 2008 only five wards are forecast to have an electoral variance of more than 10%. We propose to retain the council size of 42 members.

Final recommendation

South Northamptonshire Council should comprise 42 councillors serving 27 wards, as detailed and named in Tables 1 and 2, and illustrated on the large maps accompanying this report.

Parish electoral arrangements

- 129 As part of an FER the Committee can make recommendations for new electoral arrangements for parishes. Where there is no impact on the District Council's electoral arrangements, the Committee will generally be content to put forward for consideration proposals from parish and town councils for changes to parish electoral arrangements in FERs. However, the Committee will usually wish to see a degree of consensus between the district council and the parish council concerned. Proposals should be supported by evidence, illustrating why changes to parish electoral arrangements are required. The Committee cannot recommend changes to the external boundaries of parishes as part of a FER.
- 130 Responsibility for reviewing and implementing changes to the electoral arrangements of existing parishes, outside of an electoral review conducted by the Committee, lies with district councils.² If a district council wishes to make an Order amending the electoral arrangements of a parish that has been subject to an electoral arrangements Order made by either the Secretary of State or the Electoral Commission within the past five years, the consent of the Commission is required.
- 131 When reviewing electoral arrangements, we are required to comply as far as possible with the rules set out in Schedule 11 to the 1972 Act. The Schedule provides that if a parish is to be divided between different district wards it must also be divided into parish wards, so that each parish ward lies wholly within a single ward of the district. Accordingly, we propose consequential warding arrangements for the parishes of Brackley and Towcester to reflect the proposed district wards.
- 132 The parish of Brackley is currently served by 15 councillors representing three parish wards: East, South and West each returning five parish councillors. In the light of our proposed amendments between these three district wards we propose new parish wards of East, South and West to reflect these new boundaries. Each parish ward should return five parish councillors.

Final recommendation

Brackley Town Council should comprise 15 councillors, as at present, representing three wards: East (returning five councillors), South (returning five councillors) and West (returning five councillors). The parish ward boundaries should reflect the proposed district ward boundaries in the area, as illustrated and named on the large maps accompanying this report.

133 The parish of Towcester is currently served by 16 councillors representing two parish wards: Brook and Mill. In light of our proposed Towcester Brook and Towcester Mill district wards we proposed to amend the parish wards of Brook and Mill to reflect these new boundaries. While we recommended that both parish wards should be represented by eight councillors as part of our draft recommendations, our proposals would have meant that the parish councillors representing the proposed Brook parish ward will represent 4,371 electors while the parish councillors representing the proposed Mill parish ward would represent 2,336 electors by 2008. While we have no statutory duty to achieve electoral equality between parish wards

42

² Such reviews must be conducted in accordance with section 17 of the Local Government and Rating Act 1997.

we encouraged comments from interested parties as to the appropriate allocation of parish councillors in the town.

134 Towcester Town Council responded during Stage Three and proposed to redistribute the town councillors between the proposed parish wards. It proposed that the proposed Brook parish ward should be represented by 10 parish councillors and the proposed Mill parish ward should be represented by six parish councillors. The District Council supported this proposal. In light of the consensus between the District Council and Town Council we are content to adopt the proposed distribution of parish councillors as part of our final recommendations.

Final recommendation

Towcester Town Council should comprise 16 councillors, as at present, representing two wards: Brook (returning 10 councillors) and Mill (returning six councillors). The parish ward boundaries should reflect the proposed district ward boundaries in the area, as illustrated and named on the large maps accompanying this report.

6 What happens next?

135 Having completed our review of electoral arrangements in South Northamptonshire and submitted our final recommendations to the Electoral Commission, we have fulfilled our statutory obligation.

136 It is now up to the Electoral Commission to decide whether or not to endorse our recommendations, with or without modification, and to implement them by means of an Order. Such an Order will not be made before 27 June 2006, and the Electoral Commission will normally consider all written representation made to them by that date.

137 All further correspondence concerning our recommendations and the matters discussed in this report should be addressed to:

The Secretary
The Electoral Commission
Trevelyan House
Great Peter Street
London SW1P 2HW

Fax: 020 7271 0667

Email: implementation@electoralcommission.org.uk

The contact details above should only be used for implementation purposes.

7 Mapping

Final recommendations for South Northamptonshire

138 The following maps illustrate our proposed ward boundaries for South Northamptonshire district.

- **Sheet 1, Map 1** illustrates in outline form the proposed wards for South Northamptonshire district, including constituent parishes.
- Sheet 2, Map 2 illustrates the proposed boundaries in Towcester.
- Sheet 3, Map 3 illustrates the proposed boundaries in Brackley.

Appendix A

Glossary and abbreviations

AOND (Area of Outstanding Nethors)	A londo cono vilego e distinativa	
AONB (Area of Outstanding Natural Beauty)	A landscape whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard it	
Boundary Committee	The Boundary Committee for England is a committee of the Electoral Commission, responsible for undertaking electoral reviews	
Constituent areas	The geographical areas that make up any one ward, expressed in parishes or existing wards, or parts of either	
Consultation	An opportunity for interested parties to comment and make proposals at key stages during the review	
Council size	The number of councillors elected to serve a council	
Order (or electoral change Order)	A legal document which implements changes to the electoral arrangements of a local authority	
Electoral Commission	An independent body that was set up by the UK Parliament. Its mission is to foster public confidence and participation by promoting integrity, involvement and effectiveness in the democratic process	
Electoral equality	A measure of ensuring that every person's vote is of equal worth	
Electoral imbalance	Where there is a large difference between the number of electors represented by a councillor and the average for the district	
Electorate	People in the authority who are registered to vote in local government elections	
Multi-member ward	A ward represented by more than one councillor and usually not more than three councillors	

National Park	The 12 National Parks in England and Wales were designated under the National Parks and Access to the Countryside Act of 1949 and will soon be joined by the new designation of the South Downs. The definition of a National Park is: 'An extensive area of beautiful and relatively wild country in which, for the nation's benefit and by appropriate national decision and action: - the characteristic landscape beauty is strictly preserved; - access and facilities for open-air enjoyment are amply provided; - wildlife and buildings and places of architectural and historic interest are suitably protected; - established farming use is effectively maintained'
Number of electors per councillor	The total number of electors in a local authority divided by the number of councillors
Over-represented	Where there are fewer electors per councillor in a ward than the average the electors can be described as being over-represented
Parish	A specific and defined area of land within a single district enclosed within a parish boundary. There are over 10,000 parishes in England, which provide the first tier of representation to their local residents
Parish council	A body elected by residents of the parish who are on the electoral register, which serves and represents the area defined by the parish boundaries
Parish electoral arrangements	The total number of parish councillors; the number, names and boundaries of parish wards; and the number of councillors for each ward
Parish ward	A particular area of a parish, defined for electoral, administrative and representational purposes. Eligible electors vote in whichever parish ward they live for candidate or candidates they wish to represent them on the parish council

PER (or periodic electoral review)	A review of the electoral arrangements of all local authorities in England, undertaken periodically. The last programme of PERs was undertaken between 1996 and 2004 by the Boundary Committee for England and its predecessor, the now-defunct Local Government Commission for England
Political management arrangements	The Local Government Act 2000 enabled local authorities to modernise their decision making process. Councils could choose from three broad categories; a directly elected mayor and cabinet, a cabinet with a leader, or a directly elected mayor and council manager. Whichever of the categories it adopted became the new political management structure for the council
Under-represented	Where there are more electors per councillor in a ward than the average the electors can be described as being under-represented
Variance (or electoral variance)	How far the number of electors per councillor in a ward varies in percentage terms from the district average
Ward	A specific area of a district or borough, defined for electoral, administrative and representational purposes. Eligible electors vote in whichever ward they are registered for the candidate or candidates they wish to represent them on the district council

Appendix B

Code of practice on written consultation

The Cabinet Office's November 2000 *Code of Practice on Written Consultation* (available at www.cabinet-office.gov.uk/regulation/Consultation/Code.htm), requires all government departments and agencies to adhere to certain criteria, set out below, on the conduct of public consultations. Public bodies, such as the Boundary Committee for England, are encouraged to follow the *Code*.

The *Code of Practice* applies to consultation documents published after 1 January 2001, which should reproduce the criteria, give explanations of any departures, and confirm that the criteria have otherwise been followed.

Table B1: The Boundary Committee for England's compliance with *Code* criteria

Criteria	Compliance/departure
Timing of consultation should be built into the planning process for a policy (including legislation) or service from the start, so that it has the best prospect of improving the proposals concerned, and so that sufficient time is left for it at each stage.	We comply with this requirement.
It should be clear who is being consulted, about what questions, in what timescale and for what purpose.	We comply with this requirement.
A consultation document should be as simple and concise as possible. It should include a summary, in two pages at most, of the main questions it seeks views on. It should make it as easy as possible for readers to respond, make contact or complain.	We comply with this requirement.
Documents should be made widely available, with the fullest use of electronic means (though not to the exclusion of others), and effectively drawn to the attention of all interested groups and individuals.	We comply with this requirement.
Sufficient time should be allowed for considered responses from all groups with an interest. Twelve weeks should be the standard minimum period for a consultation.	We comply with this requirement.
Responses should be carefully and open-mindedly analysed, and the results made widely available, with an account of the views expressed, and reasons for decisions finally taken.	We comply with this requirement.
Departments should monitor and evaluate consultations, designating a consultation coordinator who will ensure the lessons are disseminated.	We comply with this requirement.