

# Democratic Renewal Working Party



*St Edmundsbury*  
BOROUGH COUNCIL

|  |  |   |  |   |                                     |                 |  |
|--|--|---|--|---|-------------------------------------|-----------------|--|
| <b>Title:</b>  | <b>Agenda</b>  |   |  |   |                                     |                 |  |
| <b>Date:</b>   | <b>Tuesday 18 November 2014</b>  |   |  |   |                                     |                 |  |
| <b>Time:</b>   | <b>5.00 pm</b>   |   |  |   |                                     |                 |  |
| <b>Venue:</b>  | <b>Ground Floor Room 11<br/>West Suffolk House<br/>Western Way<br/>Bury St Edmunds</b>   |   |  |   |                                     |                 |  |
| <b>Full Members:</b>   | <p style="text-align: center;"><b>Chairman</b> To be elected</p> <p style="text-align: center;"><b>Vice Chairman</b> To be appointed</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 33%;"><u>Conservative Members</u> (6)</td> <td style="width: 33%;">Patrick Chung<br/>Robert Clifton-Brown<br/>Paul Farmer</td> <td style="width: 33%;">Helen Levack<br/>Jim Thorndyke<br/>Patricia Warby</td> </tr> <tr> <td><u>Independent Group Member</u> (1)</td> <td>Derek Redhead</td> <td></td> </tr> </table> | <u>Conservative Members</u> (6)                 | Patrick Chung<br>Robert Clifton-Brown<br>Paul Farmer | Helen Levack<br>Jim Thorndyke<br>Patricia Warby | <u>Independent Group Member</u> (1) | Derek Redhead   |  |
| <u>Conservative Members</u> (6)                                  | Patrick Chung<br>Robert Clifton-Brown<br>Paul Farmer   | Helen Levack<br>Jim Thorndyke<br>Patricia Warby |  |   |                                     |                 |  |
| <u>Independent Group Member</u> (1)                              | Derek Redhead  |   |  |   |                                     |                 |  |
| <b>Substitutes:</b>  | <table style="width: 100%; border: none;"> <tr> <td style="width: 33%;"><u>Conservative Members</u> (2)</td> <td style="width: 33%;">Peter Stevens</td> <td style="width: 33%;">Stefan Oliver</td> </tr> <tr> <td><u>Independent Group Member</u> (1)</td> <td>Trevor Beckwith</td> <td></td> </tr> </table>   | <u>Conservative Members</u> (2)                 | Peter Stevens  | Stefan Oliver                                   | <u>Independent Group Member</u> (1) | Trevor Beckwith |  |
| <u>Conservative Members</u> (2)                                  | Peter Stevens  | Stefan Oliver                                   |  |   |                                     |                 |  |
| <u>Independent Group Member</u> (1)                              | Trevor Beckwith  |   |  |   |                                     |                 |  |
| <b>Interests – Declaration and Restriction on Participation:</b> | Members are reminded of their responsibility to declare any disclosable pecuniary interest not entered in the Authority's register or local non pecuniary interest which they have in any item of business on the agenda (subject to the exception for sensitive information) and to leave the meeting prior to discussion and voting on an item in which they have a disclosable pecuniary interest.  |   |  |   |                                     |                 |  |
| <b>Quorum:</b>   | Three Members  |   |  |   |                                     |                 |  |
| <b>Committee administrator:</b>                                  | <p><b>Fiona Osman</b><br/>Democratic Services Manager<br/><b>Tel:</b> 01284 757105<br/><b>Email:</b> <a href="mailto:fiona.osman@westsuffolk.gov.uk">fiona.osman@westsuffolk.gov.uk</a></p>  |   |  |   |                                     |                 |  |

# **Agenda**

## **Procedural Matters**

### **Part 1 – Public**

|   | <i><b>Page No</b></i> |
|---|-----------------------|
| <b>1. Election of Chairman</b>  |                       |
| <b>2. Apologies for Absence</b>   |                       |
| <b>3. Substitutes</b>   |                       |
| <b>4. Minutes</b>   | <b>1 - 4</b>          |
| To confirm the minutes of the meeting held on 2 December 2013<br>(copy attached). |                       |
| <b>5. Appointment of Vice Chairman</b>  |                       |
| <b>6. Polling District Review</b>   | <b>5 - 22</b>         |
| Report No: <b>DRW/SE/14/001</b>   |                       |
| <b>7. Community Governance Review</b>   | <b>23 - 42</b>        |
| Report No: <b>DRW/SE/14/002</b>   |                       |

## **ST EDMUNDSBURY BOROUGH COUNCIL**

### **DEMOCRATIC RENEWAL WORKING PARTY**

#### **Minutes of a meeting held on Monday 2 December 2013 at 5.00 pm in Room GFR12, West Suffolk House, Western Way, Bury St Edmunds**

PRESENT: Councillor Mrs P A Warby (Chairman)  
Councillors Chung, Farmer, Mrs Levack, Redhead and  
Thorndyke

BY INVITATION: Councillor Mr Cox

#### **37. Substitutes**

No substitutions were declared.

#### **38. Apologies for Absence**

Apologies for absence were received from Councillor Clifton-Brown

#### **39. Minutes**

The minutes of the meeting held on 2 May 2013 were confirmed as a correct record and signed by the Chairman.

#### **40. Declarations of Interests**

Members' declarations of interests are recorded under the item to which the declaration relates.

#### **41. Amendment to Terms of Reference of the Democratic Renewal Working Party**

The Working Party considered Report E180 (previously circulated) which suggested an amendment to the Terms of Reference of the Democratic Renewal Working Party.

The Learning and Development Advisor reminded the Working Party that a Joint Member Learning and Development Group (JMLDG) had been established in December 2012 to contribute to and support member development opportunities. The current constitution of the group was eight members across political parties.

Currently, the decision making process for member development was different in both authorities and it was suggested that, to improve efficiency, the processes should be aligned. Members were reminded that the Joint Charter Application would be taking place in September 2014 and it would be beneficial if the practices and reporting processes were aligned by then.

Members agreed that this was a sensible solution but there was some concern that decisions would be made by Cabinet and not Full Council. It was proposed that the constitution of the group should be the Portfolio Holder plus three members from each authority.



**RECOMMENDED:- That**

- (1) the amended Terms of Reference of the Democratic Renewal Working Party, as detailed in Appendix 2 to Report E180, be approved.**
- (2) the constitution of the Joint Member Learning and Development Group to consist of the Portfolio Holder and three members from each authority.**

**42. Amendment to the Constitution: (1) Filming of meetings and (2) Sealing documents**

Councillor Mrs Levack arrived during the consideration of this item.

The Working Party considered Report E181 (previously circulated) which recommended that two amendments be made to the Constitution.

The first amendment was with reference to the filming of meetings and use of social media. The Monitoring Officer explained that the constitution currently stipulates five working days notice be given if someone wishes to record a meeting. This was now out of touch with advances in technology as recording devices have become much smaller and unobtrusive (such as mobile phones). It was proposed that the constitution be amended to ensure there is no impediment to those who may wish to record meetings as in Appendix 1 to Report E181.

The Monitoring Officer drew attention to the new wording for the Constitution in 2.1 (7A.2) which would warn any person attending a meeting that it may be recorded or broadcast and that anyone who objected to being filmed should advise the Committee Administrator who would instruct that the person was not included in the filming.

Although some concern was expressed that notice of filming would not have to be given in advance, the Members supported the proposed amendment. Members did point out that the front of agendas would need to be amended as they currently requested that all attendees should 'switch off communication devices' during the meeting. It was agreed that the revised wording would be e-mailed to all members of the Working Party for comments before being introduced.

The second amendment was with reference to the signing and sealing of documents. The Monitoring Officer explained the process by which certain documents have to be completed 'under seal'; this is where the council affixes an official seal which is embossed, uniquely numbered and the details recorded. The constitution currently states that the seal is attested by two specified officers. It was proposed that the required number of signatories is reduced to one, and that the number of officers who able to sign is increased (see 27.3 of Report E181). This would streamline the process and bring it into line with Forest Heath District Council.



**RECOMMENDED:-**

***That Council approves the changes to the constitution set out in Appendices to Report E181 in respect of the recording of meetings and the use of social media in meetings, and the signing and sealing of documents.***

#### **43. Dates of Future Meetings**

The Working Party confirmed the following meeting dates: -

Thursday 13 February 2014; and  
Thursday 8 May 2014.

All meetings to commence at 5.00 pm.

The meeting concluded at 5.38 pm.

**CHAIRMAN**

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# Democratic Renewal Working Party



St Edmundsbury  
BOROUGH COUNCIL

|  |  |                  |
|--|--|------------------|
| <b>Title of Report:</b>  | <b>Polling District Review</b>   |                  |
| <b>Report No:</b>  | <b>DRW/SE/14/001</b><br>[to be completed by Democratic Services]   |                  |
| <b>Decisions plan reference:</b>   |  |                  |
| <b>Report to and date/s:</b>   | <b>Democratic Renewal Working Party</b>  | 18 November 2014 |
|  | <b>Council</b>   | 16 December 2014 |
| <b>Portfolio holder:</b>   | Dave Ray<br>Portfolio Holder for Resources and Performance<br><b>Tel:</b> 01359 250912<br><b>Email:</b> david.ray@stedmundsbury.gov.uk   |                  |
| <b>Lead officer:</b>   | Ken Crow<br>Electoral Services Manager<br><b>Tel:</b> 01638 719364<br><b>Email:</b> ken.crow@westsuffolk.gov.uk  |                  |
| <b>Purpose of report:</b>  | To review the designation of polling districts and polling places in the Borough of St Edmundsbury and to implement any recommendations in the publication of the new Electoral Register.  |                  |
| <b>Recommendation:</b>   | <b>Democratic Renewal Working Party:</b><br><br>It is <b>RECOMMENDED</b> that, subject to approval by full Council, the Schedule of Polling Districts is amended to reflect the creation of two new polling districts in the Risbygate Ward in Bury St Edmunds as described at 2.2 of this report. |                  |
| <b>Key Decision:</b><br><br>(Check the appropriate box and delete all those that <b>do not</b> apply.) | <i>Is this a Key Decision and, if so, under which definition?</i><br>Yes, it is a Key Decision - <input type="checkbox"/><br>No, it is not a Key Decision - <input checked="" type="checkbox"/>  |                  |

The key decision made as a result of this report will be published within **48 hours** and cannot be actioned until **seven working days** have elapsed. This item is included on the Decisions Plan.

|  |   |   |  |
|--|---|---|--|
| <b>Consultation:</b>   |   | <ul style="list-style-type: none"> <li>A letter outlining the review process and a background document was circulated to: <ul style="list-style-type: none"> <li>- Borough Councillors</li> <li>- County Councillors</li> <li>- Parish Councils</li> <li>- Party Agents</li> <li>- Acting Returning Officers for West Suffolk and South Suffolk Constituencies</li> </ul> </li> <li>A link was put on the home page of the Council's website and allowed the public to view the consultation information</li> </ul> |  |
| <b>Alternative option(s):</b>  |   | <ul style="list-style-type: none"> <li>The Electoral Registration and Administration Act 2013 requires every Council to conduct a review during the 16 months beginning 1 October 2013.</li> </ul>  |  |
| <b>Implications:</b>   |   |   |  |
| Are there any <b>financial</b> implications?<br>If yes, please give details  |   | Yes <input type="checkbox"/>  | No <input checked="" type="checkbox"/> |
| Are there any <b>staffing</b> implications?<br>If yes, please give details   |   | Yes <input type="checkbox"/>  | No <input checked="" type="checkbox"/> |
| Are there any <b>ICT</b> implications? If yes, please give details   |   | Yes <input type="checkbox"/>  | No <input checked="" type="checkbox"/> |
| Are there any <b>legal and/or policy</b> implications? If yes, please give details                                 |   | Yes <input type="checkbox"/>  | No <input checked="" type="checkbox"/> |
| Are there any <b>equality</b> implications?<br>If yes, please give details   |   | Yes <input type="checkbox"/>  | No <input checked="" type="checkbox"/> |
| <b>Risk/opportunity assessment:</b>  |   | <i>(potential hazards or opportunities affecting corporate, service or project objectives)</i>  |  |
| <b>Risk area</b>   | <b>Inherent level of risk</b> (before controls) | <b>Controls</b>   | <b>Residual risk</b> (after controls)  |
|  | Low/Medium/ High*                               |   | Low/Medium/ High*                      |
| <b>Ward(s) affected:</b>   |   | All Wards   |  |
| <b>Background papers:</b><br><i>(all background papers are to be published on the website and a link included)</i> |   |   |  |
| <b>Documents attached:</b>   |   | <i>(Please list any appendices.)</i><br><b>Appendix A</b> – Background information for consultees<br><b>Appendix B</b> – Details of representations received<br><b>Appendix C</b> – Amended Schedule of Polling Districts<br><b>Appendix D</b> – Projection of Significant Growth (10 units or more) in the next 5 years  |  |



## **1. Key issues and reasons for recommendation(s)**

### **1.1 Background**

1.1.1 The last Polling District review was completed in December 2011. The most efficient and cost effective time to make any changes is when the newly updated register is published on 1 December, therefore, a report is being brought to this Working Party, to allow recommendations to be considered by full Council on 16 December 2014, in time for implementation on the new register.

### **1.2 The conduct of the review**

1.2.1 At the beginning of August 2014 a letter outlining the review process and a background document was circulated to the following people/groups:-

- Borough Councillors;
- County Councillors for divisions in St Edmundsbury;
- Parish Councils;
- Party Agents; and
- Acting Returning Officers of the West Suffolk and South Suffolk
- constituencies;

1.2.2 A link was put on the home page of the Council's website alerting visitors to the site that the review was taking place. The link allowed people to view the consultation information.

1.2.3 Appendix A includes background information regarding the conduct of a polling district review.

1.2.4 Three representations were received which requested a change to the schedule of polling districts. The three representations are included at Appendix B.

1.2.5 The amended schedule of polling districts is included at Appendix C

### **1.2 Issues to consider when making recommendations**

1.2.1 Appendix A outlines the considerations in detail, but in essence in making recommendations Working Party Members:-

- should seek to provide all electors with as reasonable facilities for voting as are practical; and
- have regard to accessibility when making any designations for polling places.

In addition, where areas are parished each parish should normally be a polling district in its own right unless there is a compelling reason otherwise.

1.2.2 There are two elements to the recommendations that need to be formulated for consideration by Full Council. The first is to indicate whether any changes to the boundaries of polling districts are considered necessary. The second relates to the designation of polling places and the policy the Borough Council

adopts in relation to this as, although the Borough Council has the power to designate a polling place for every polling district, it is not compelled to make a designation except in instances when electors have to vote outside of their polling district. This generally occurs where there is no venue or suitable site for a caravan or portacabin within the district, so electors vote in a neighbouring area. If no Polling Place is designated then by default the polling district is the Polling Place. The Borough Council has previously adopted the policy of only designating a Polling Place where out-of-district polling takes place as this allows for flexibility if buildings are not available, particularly in relation to unscheduled elections where bookings have to be made at short notice.

- 1.2.3 Where a proposal to create a new polling district is made, this will inevitable have financial implications. The current arrangements are for larger polling district to have one polling station for the majority of elections, increasing to two for Parliamentary elections but where a second polling district is created, this will require two polling stations to be used for all elections.

### 1.3 **Forecast growth**

- 1.3.1 The Planning Section of the Borough Council have provided information on the anticipated areas for significant growth within the Borough up to the end of the four year period after this review takes effect. A table listing the figures is included as Appendix D.
- 1.3.2 The development of the strategic sites designated in the Bury St Edmunds, Haverhill and Rural Vision 2031 documents will be reviewed annually and amendments to polling districts and polling places made where appropriate.
- 1.3.3 Where necessary the development of sites on the boundaries of polling districts will be considered as part of a community governance review. Recommendations will also be made to the Local Government Boundary Commission for England where appropriate.

## 2. **Additional supporting information (if required)**

### 2.1 **St Olaves**

- 2.1.2 The following representations have been received to split St Olaves Ward into two polling districts:
  - (a) Split the Ward into two polling districts and thereby separate the 'Howard Estate' and the Mildenhall Road Estate within their distinct identities. Allow the St Olaves voters on the Mildenhall Road Estate to vote at the polling place for the Northgate polling district.
  - (b) Split the Ward into two polling districts and use two polling stations; the Newbury Community Centre and either the Methodist Church on Northumberland Avenue or either the Christian Resource Centre and Jehovah's Kingdom Hall in Oakes Road.
- 2.1.3 Officers are not minded to recommend this proposal for the following reasons:-

- (a) Directing St Olaves electors from the Mildenhall Road Estate to vote at the polling station for Northgate Ward (Anselm Avenue Community Centre) could create confusion for electors. Also, an additional polling station would be required within Anselm Avenue Community Centre to avoid confusion regarding which Ward ballot paper to give to electors from St Olaves Ward or Northgate Ward.
- (b) Splitting the polling district and using the Northumberland Methodist Church or using either the Christian Resource Centre or Jehovah's Kingdom Hall on Oakes Road as an additional polling station would create an additional cost of approximately £700 at every election. This cost is deemed unnecessary given that the two suggested polling stations are under half a mile from the existing polling station at Newbury Community Centre

## 2.2 **Risbygate Part One and Part Two**

2.2.2 A representation was received to make the following amendments to the Risbygate polling districts:

- (a) Move the electors from Station Hill, Tayfen Road (part of) and Tayfen Terrace from Risbygate Part Two to Risbygate Part One.
- (b) Split Risbygate Part Two into two polling districts with the dividing line being Spring Lane and the Nature Reserve between Spring Lane and Beetons Way.

2.2.3 Officers recommend this proposal for the following reasons:-

- (a) The polling station that is regularly used for Risbygate Part One is in closer proximity to the electors home, this may increase turnout at no additional cost to the council.
- (b) The polling arrangements in the Friends Meeting House have caused disruption at past elections due to parking and space available in the building. The creation of a new polling district and polling station may increase turnout due to a polling station in closer proximity to the electors home. Also this will only be a small cost to the council as the Friends Meeting House will no longer require a dual polling station to manage a large electorate.

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## **St Edmundsbury Borough Council – Polling District Review Background information for consultees**

**Polling district** – the geographic areas into which a council divide its area for the purposes of conducting elections. In making the designations Councils are required to seek to provide all electors with as reasonable facilities for voting as are practical, and to have regard to accessibility when making any designations for polling places. Where areas are parished each parish should normally be a polling district in its own right unless there is a compelling reason otherwise. In reality this means that many of the polling districts in St Edmundsbury are pre-defined as a result of parish arrangements and the only question to consider is whether it would make for more effective arrangements if the parish were divided into parish wards. Currently in the rural areas of St Edmundsbury there are only two instances where parishes have been warded, and in each case the warding has been necessitated by the parish straddling two wards and separate polling districts being required to facilitate the two different sets of parishioners to vote in different Borough wards. In urban areas there is potentially more scope to alter the boundaries of polling districts. Here the prime consideration is to achieve reasonable facilities for voting for all the electors, so far as practicable.

**Polling place** – this can either be as broad as a geographic area, or as tightly defined as a specific building. Councils are not generally obliged to designate polling places. The only circumstance in which they must make a designation is if polling cannot take place within the polling district. This usually only arises when there are no suitable premises or locations for a temporary building within the polling district. In these instances the Council must designate a polling place. If no polling place is designated then the whole polling district is treated as the polling place. St Edmundsbury has previously followed the practice of only designating polling places where out of district polling is necessary as to designate polling places as a matter of routine can cause administrative difficulties if buildings are not available for use at a particular election.

**Polling stations** – the polling station is the actual room used for polling. The choice of polling station rests with the Returning Officer, not with the Council, so this review is not about the buildings used, but about the administrative areas into which the Register of Electors is divided. Having said that as indicated in the covering letter if any individual or organisation responding to this review has suggestions about alternative venues then the Returning Officer would be pleased to consider them, but they will not form part of the formal review report to the Council.

**What is included in the review** – The Council is only obliged to conduct a review of any area which it has not reviewed within the last 4 years. In that period St Edmundsbury has consulted on arrangements across a range of areas in the Borough as the need as arisen. However, for the sack of clarity and completeness, the whole of the Borough will be included in the review.

**What is not included in the review** – as already indicated the location of polling stations does not form part of the formal review. Also excluded from the review are proposals for the alteration of the boundaries of the wards or

parishes, or the number of councillors on a council. All these are issues which have their own separate review processes.

**How the review is being conducted** - The final decision on designations of polling districts and polling places will be made by the full Council of St Edmundsbury. As the terms of reference for the Council's Democratic Renewal Working Party include advising the Council on electoral matters, the outcomes of this consultation process will, in the first instance, be considered by the Working Party at its meeting on 18 November 2014. The Working Party will then forward recommendations to the full Council meeting on 16 December 2014. Although the full Council will be free to debate the recommendations it is anticipated that the detailed work of the review and discussion of any proposals for change will take place at the meeting of the Working Party. Although there is no automatic right of access to the meeting for members of the public the Chairman of the Working Party is happy for any individual or organisation to attend the meeting to hear the debate on this item.

**Suggesting a change to an existing polling district or polling place designation** - When considering any proposals for change the Council will be aiming, so far as practicable, to make equitable arrangements for polling right across the Borough. Proposals will be considered in this wider context, as well as with regard to the convenience of the local arrangements.

**Who has been consulted?** - All Borough and County Councillors for St Edmundsbury, Parish Councils, the Returning Officer of each parliamentary constituency within the Borough, the County Returning Officer and local political parties.

If you have any queries about the polling district review process, or require further information, please contact

Ken Crow  
Electoral Services Manager  
St Edmundsbury Borough Council

**Details of representatations received from****Kevin Hind (Bury Town Council Councillor)**

St. Olave's Ward is a two-member ward but unlike other two-member wards in the town it only has one polling station: at the New Bury Community Centre on St. Olave's Road. By contrast, Minden Ward has two polling stations as well as Risbygate and Westgate Wards. Eastgate Ward returns only one member but has two polling stations. The electorate of Eastgate Ward was 1,892 in 2011. In St. Olave's the electorate in that year was 3,293. I find it absurd that the ward with the lower population should have two polling stations.

Unfortunately, the Borough Council's attitude towards this whole issue in the past has been most unhelpful. At the County Council by-election in 2010 residents were informed that New Bury CC would not be available for polling and that the polling station would be moved to Northumberland Avenue Methodist Church. This was actually a mistake and complaints were made because of the effect on turnout. Rather unnecessarily I thought, the response to the complaints (attached) ended by comparing the turnout at New Bury CC in historic elections with turnouts at other polling stations. By implication, it sounded as though St Eds were saying that because St. Olave's has had an historic low turnout it would not have had any impact on voting. I found this argument counter-intuitive: surely if you have more polling stations which are closer to where people live, they are more accessible so more people vote? Of course, it is up to candidates and political parties to encourage people to vote on polling day, and if they choose not to that is their prerogative. However, the local authority should at least play its part by having suitable numbers of polling stations for voters to go to. Democracy costs money and it does not bode well for it if people are disenfranchised because of cost-effectiveness, especially when there is a smaller ward with a lower population which has more than one polling station!

Therefore, I think that St. Olave's currently does not have 'such reasonable facilities for voting as are practicable in the circumstances'. It only has one polling station whereas other two-member wards (and indeed the single-member ward referred to) have two polling places. Apart from New Bury CC and the Methodist Church there are other facilities which could be used for polling and this would spread the facilities more evenly across the ward. St. Olave's Ward includes part of Gloucester Road and Prince Charles Avenue: surely it makes more sense for residents in those areas of the ward to vote at the Methodist Church rather than New Bury CC? There is also a requirement that polling places be accessible to all electors. As far as I am aware, there is step-free access at the Christian Resource Centre and the Jehovah's Kingdom Hall on Oakes Road. I think these locations should be considered as well as the Methodist Church.

Furthermore, New Bury CC is dead centre of the ward, whereas the other two-member wards have two polling stations spread at equal distances from the centre of the ward so (theoretically) residents only have half as far to walk (e.g. in Minden Ward one polling station is on Park Road at All Saints Church

while the other polling station is on the Westley Estate at Westbury Community Centre). Of course, people drive to polling stations if they are voting on their way home from work, so parking provision also needs to be considered. There is currently ample parking at New Bury CC which is helpful in this situation. However, with only one polling station the parking facilities at New Bury CC risk becoming more crowded whereas an additional polling place would relieve this pressure.

**Councillor Paul Hopfensberger – (St Olaves Ward Member)**

I just wanted to point out again (this has been raised before) that St Olaves Ward contains ALL of The Howard Estate but only PART of The Mildenhall Estate. As a semi-turf war exists there, some people who live on the Mildenhall Road Estate will not travel onto The Howard Estate to vote at the Newbury Community Centre. It would be beneficial if residents of the Mildenhall Estate could vote at the Anselm Centre. This may help to raise the low voting numbers on the ward.

**Councillor David Nettleton – (Suffolk County Councillor for Tower Division)**

There are currently two polling districts in the Risbygate ward. There are 1015 electors in Risbygate 1 and 2605 electors in Risbygate 2. The total number of electors is 3620. The Risbygate 1 polling station is in Fornham Road and the Risbygate 2 polling station is in St John's Street. Although the former Railway Mission Church in Fornham Road is rather small and the entrance is at the back of the building, it is reasonably situated opposite Tesco and close by the train station. Fornham Road is the main traffic route in this area and easy to reach by road.

Currently, electors living on Station Hill vote at the Friends Meeting House in St John's Street. Given it's close proximity to Fornham Road, I think the 87 electors here should be transferred to Risbygate 1. As a further 28 electors live on the northern side of Tayfen Road – 13 in Tayfen Terrace, 15 in Tayfen Road – it seems sensible to add all 115 electors living in this triangle to Risbygate 1. This would take the total to 1130.

Even with this transfer, there would still be 2490 electors entitled to vote at the polling station in St John's Street. There are two issues here: accessibility from the Queen's/York area in particular, and the occasional congestion in the Friends Meeting House at peak times. With the local election due on the same day as the general election in 2015, even the use of two rooms may not be enough.

I suggest a third polling district and polling station in the Risbygate ward. West Road Church on the northern corner of Queen's Road and West Road is an excellent building and an ideal polling station. Risbygate 3 would be bounded by the blue line along the middle of Albert Crescent and Albert Street, east into Out Risbygate, but instead of continuing along Risbygate Street, turn north along the middle of Spring Lane until the bend just past King Edward's. From there, the line should turn west to follow the pedestrian and cycle path



out towards Beetons Way and the ward boundary. Although Spring Lane isn't wide, it is a strong polling district boundary as the vast majority of electors line on the eastern side of the road. There is a small apartment block of 3 on the corner with Out Risbygate, one house set back from the road but attached to properties in Out Risbygate, and the caretaker's bungalow in the grounds of the upper school.

The split would be 1470 in Risbygate 2 and 1020 electors in the newly-formed Risbygate 3.



**St Edmundsbury Borough Council - AMENDED Schedule of Polling Districts:**

| <b>Ward</b>               | <b>Register</b> | <b>Description/Location</b>                    |
|---------------------------|-----------------|--|
| <b>Abbeygate Part One</b> | B-BAb1          | Abbeygate Ward of Bury St Edmunds Town Council |
|                           | B-BAb2          |  |
| <b>Bardwell</b>           | WBdw            | Bardwell Parish                                |
|                           | WBhm            | Barnham Parish                                 |
|                           | WCWe            | Coney Weston Parish                            |
|                           | WEus            | Euston Parish                                  |
|                           | WFMa            | Fakenham Magna Parish                          |
|                           | WHon1           | Village Parish Ward of Honington Parish        |
|                           | WSap            | Sapiston Parish                                |
| <b>Barningham</b>         | WBgm            | Barningham Parish                              |
|                           | WHep            | Hepworth Parish                                |
|                           | Whop            | Hopton Parish                                  |
|                           | WKne            | Knettishall Parish                             |
|                           | WMWe            | Market Weston Parish                           |
|                           | WThe            | Thelnetham Parish                              |
| <b>Barrow</b>             | WBrw            | Barrow Parish                                  |
|                           | WDen            | Denham Parish                                  |
|                           | WSax1           | Great Saxham Parish                            |
|                           | WSax2           | Little Saxham Parish                           |
|                           | WWes            | Westley Parish                                 |
| <b>Cavendish</b>          | SCav            | Cavendish Parish                               |
|                           | SDes            | Denston Parish                                 |
|                           | Shak            | Hawkedon Parish                                |
|                           | SPos            | Poslingford Parish                             |
|                           | SStf            | Stansfield Parish                              |
|                           | SBro            | Brockley Parish                                |
| <b>Chedburgh</b>          | WChd            | Chedburgh Parish                               |
|                           | WChv            | Chevington Parish                              |
|                           | WRed            | Rede Parish                                    |
|                           | WWhe            | Whepstead Parish                               |
|                           | WHaw            | Hawstead Parish                                |
| <b>Clare</b>              | SCLa            | Clare Parish                                   |
| <b>Eastgate Part 1</b>    | B-BEa1          | Eastgate Ward of Bury St Edmunds Town Council  |
|                           | B-BEa2          |  |
| <b>Fornham</b>            | BFAS            | Village Ward of Fornham All Saints Parish      |
|                           | BFSG            | Fornham St Genevieve Parish                    |
|                           | BFSM            | Fornham St Martin Parish                       |
| <b>Great Barton</b>       | BGBa            | Great Barton Parish                            |
| <b>Haverhill East</b>     | W-HHE1          | Haverhill East Ward of Haverhill Town Council  |
|                           | W-HHE2          |  |
|                           | W-HHE3          |  |
| <b>Haverhill North</b>    | W-HHN1          | Haverhill North Ward of Haverhill Town Council |
|                           | W-HHN2          |  |
|                           | W-HHN3          |  |
| <b>Haverhill South</b>    | W-HHS1          | Haverhill South Ward of Haverhill Town         |

| Ward                              | Register | Description/Location                                 |
|-----------------------------------|----------|--|
|                                   | W-HHS2   | Council  |
| <b>Haverhill West</b>             | W-HHW1   | Haverhill West Ward of Haverhill Town                |
|                                   | W-HHW2   | Council  |
| <b>Horringer &amp; Whelnetham</b> | BNow     | Nowton Parish  |
|                                   | BGWh     | Great Whelnetham Parish                              |
|                                   | BLWh     | Little Whelnetham Parish                             |
|                                   | BHor     | Horringer Parish                                     |
|                                   | Bick     | Ickworth Parish                                      |
| <b>Hundon</b>                     | WHun     | Hundon Parish  |
|                                   | WSbC     | Stoke-by-Clare Parish                                |
|                                   | WSt      | Stradishall Parish                                   |
|                                   | WWix     | Wixoe Parish   |
| <b>Ixworth</b>                    | WIxw     | Ixworth Parish                                       |
|                                   | WIxT     | Ixworth Thorpe Parish                                |
| <b>Kedington</b>                  | WBnd     | Barnardiston Parish                                  |
|                                   | WKed     | Kedington Parish                                     |
| <b>Minden</b>                     | B-BMi1   | Minden Ward of Bury St Edmunds Town                  |
|                                   | B-BMi2   | Council  |
| <b>Moreton Hall</b>               | B-BMH1   | Moreton Hall Ward of Bury St Edmunds                 |
|                                   | B-BMH2   | Town Council   |
| <b>Northgate</b>                  | B-BNo    | Northgate Ward of Bury St Edmunds<br>Town Council    |
| <b>Pakenham</b>                   | BAmp     | Ampton Parish  |
|                                   | BLLi     | Little Livermere Parish                              |
|                                   | BTim     | Timworth Parish                                      |
|                                   | BGLi     | Great Livermere Parish                               |
|                                   | BPak     | Pakenham Parish                                      |
|                                   | BTro     | Troston Parish                                       |
|                                   | BHon2    | Honington Station Parish Ward of<br>Honington Parish |
| <b>Risby</b>                      | WCul     | Culford Parish                                       |
|                                   | WWSt     | West Stow Parish                                     |
|                                   | WWor     | Wordwell Parish                                      |
|                                   | WFle     | Flempton Parish                                      |
|                                   | WHen     | Hengrave Parish                                      |
|                                   | WLac     | Lackford Parish                                      |
|                                   | WRis     | Risby Parish   |
|                                   | Wing     | Ingham Parish  |
| <b>Risbygate</b>                  | B-BRi1   | Risbygate Ward of Bury St Edmunds                    |
|                                   | B-BRi2   | Town Council   |
|                                   | B-BRi3   |  |
|                                   | B-BRi4   |  |
| <b>Rougham</b>                    | BBCS     | Bradfield Combust with Stanningfield<br>Parish       |
|                                   | BBSC     | Bradfield St Clare Parish                            |
|                                   | BBSG     | Bradfield St George Parish                           |
|                                   | BRus     | Rushbrooke with Rougham Parish                       |
| <b>Southgate</b>                  | B-BSg    | Southgate Ward of Bury St Edmunds<br>Town Council    |

| <b>Ward</b>         | <b>Register</b> | <b>Description/Location</b>                    |
|---------------------|-----------------|--|
| <b>St Olaves</b>    | B-BSO           | St Olaves Ward of Bury St Edmunds Town Council |
| <b>Stanton</b>      | WSta            | Stanton Parish                                 |
| <b>Westgate</b>     | B-BWe1          | Westgate Ward of Bury St Edmunds Town Council  |
|                     | B-BWe2          |  |
| <b>Wickhambrook</b> | WDep            | Depden Parish                                  |
|                     | WHar            | Hargrave Parish                                |
|                     | WLid            | Lidgate Parish                                 |
|                     | WOus            | Ousden Parish                                  |
|                     | WWic            | Wickhambrook Parish                            |
| <b>Withersfield</b> | WGBr            | Great Bradley Parish                           |
|                     | WLBr            | Little Bradley Parish                          |
|                     | WCow            | Cowlinge Parish                                |
|                     | WGTh            | Great Thurlow Parish                           |
|                     | WLTh            | Little Thurlow Parish                          |
|                     | WWit            | Withersfield Parish                            |
|                     | WGWr            | Great Wratting Parish                          |
|                     | WLWr            | Little Wratting Parish                         |

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**Projection of Significant Growth (10 units or more) in the next 5 years**

| Polling District                         | Number of Properties (October 2014) | Total number of electors (October 2014) | Average no. of electors per property | Predicted household development 2014/15 - 2018/19 (growth of more than 10 units) | Forecast of additional electors based on average per property | Forecast elector total |
|--|-------------------------------------|---|--------------------------------------|--|---|------------------------|
| B-BAb1 - Abbeygate Part One              | 1606                                | 2040                                    | 1.27                                 | 102  | 130   | 2170                   |
| B-BEa1 - Eastgate Part One               | 577                                 | 753                                     | 1.31                                 | 53   | 69  | 822                    |
| B-BRi2 - Risbygate Part Two              | 1907                                | 2613                                    | 1.37                                 | 180  | 247   | 2860                   |
| B-BSg - Southgate                        | 2072                                | 3476                                    | 1.68                                 | 12   | 20  | 3496                   |
| <b>BFAS - Fornham All Saints</b>         | <b>335</b>                          | <b>587</b>                              | <b>1.75</b>                          | <b>530</b>   | <b>929</b>  | <b>1516</b>            |
| BGBa - Great Barton                      | 910                                 | 1789                                    | 1.97                                 | 70   | 138   | 1927                   |
| BGWh - Great Whelnhem                    | 360                                 | 651                                     | 1.81                                 | 41   | 74  | 725                    |
| <b>BRus - Rushbrooke with Rougham</b>    | <b>507</b>                          | <b>922</b>                              | <b>1.82</b>                          | <b>262</b>   | <b>476</b>  | <b>1398</b>            |
| SCav - Cavendish                         | 482                                 | 876                                     | 1.82                                 | 10   | 18  | 894                    |
| SCla - Clare                             | 1002                                | 1692                                    | 1.69                                 | 80   | 135   | 1827                   |
| W-HHE2 - Haverhill East Part Two         | 1253                                | 2336                                    | 1.86                                 | 50   | 93  | 2429                   |
| <b>W-HHN1 - Haverhill North Part One</b> | <b>1436</b>                         | <b>2752</b>                             | <b>1.92</b>                          | <b>460</b>   | <b>882</b>  | <b>3634</b>            |
| W-HHN3 - Haverhill North Part Three      | 596                                 | 997                                     | 1.67                                 | 38   | 64  | 1061                   |
| W-HHS1 - Haverhill South Part One        | 1521                                | 2668                                    | 1.75                                 | 35   | 61  | 2729                   |
| W-HHS2 -                                 | 792                                 | 1209                                    | 1.53                                 | 71   | 108   | 1317                   |

## APPENDIX D

| Polling District                          | Number of Properties (October 2014) | Total number of electors (October 2014) | Average no. of electors per property | Predicted household development 2014/15 - 2018/19 (growth of more than 10 units) | Forecast of additional electors based on average per property | Forecast elector total |
|---|-------------------------------------|---|--------------------------------------|--|---|------------------------|
| Haverhill South Part Two                  |                                     |   |                                      |  |   |                        |
| WBgm - Barningham                         | 395                                 | 744                                     | 1.88                                 | 21   | 40  | 784                    |
| WBrw - Barrow                             | 718                                 | 1333                                    | 1.86                                 | 200  | 371   | 1704                   |
| WChd - Chedburgh                          | 257                                 | 505                                     | 1.96                                 | 51   | 100   | 605                    |
| WHop - Hopton                             | 288                                 | 521                                     | 1.81                                 | 25   | 45  | 566                    |
| WIng - Ingham                             | 182                                 | 341                                     | 1.87                                 | 22   | 41  | 382                    |
| WIXw - Ixworth                            | 916                                 | 1767                                    | 1.93                                 | 106  | 204   | 1971                   |
| WKed - Kedington                          | 767                                 | 1446                                    | 1.89                                 | 65   | 123   | 1569                   |
| WRis - Risby                              | 327                                 | 666                                     | 2.04                                 | 20   | 41  | 707                    |
| WStn - Stanton                            | 1189                                | 2068                                    | 1.74                                 | 101  | 176   | 2244                   |
| WWes - Westley                            | 79                                  | 156                                     | 1.97                                 | 250  | 494   | 650                    |
| WWic - Wickhambrook                       | 532                                 | 999                                     | 1.88                                 | 22   | 41  | 1040                   |
| WLWr - Little Wrating / WKED - Kedington* | 833                                 | 1560                                    | 1.87                                 | 300  | 562   | 2122                   |

\* This strategic site is North-East Haverhill and covers both Kedington and Little Wrating polling districts.

These figures were been provided by the St Edmundsbury planning team in October 2014.

Polling Districts have only been listed if growth of 10 units or more is planned for a site up to and including 2018/19 (so planning permissions for smaller numbers of units have not been included and no estimate has been made of the likelihood of increased elector numbers through in-filling or the sub-division of existing units). The forecast for additional electors has been calculated by taking the average number of electors per household in the existing polling district and multiplying this by the number of units anticipated in the developments.



# Democratic Renewal Working Party



*St Edmundsbury*  
BOROUGH COUNCIL

|                                  |   |                  |
|----------------------------------|---|------------------|
| <b>Title of Report:</b>          | <b>Community Governance Review</b>  |                  |
| <b>Report No:</b>                | <b>DRW/SE/14/002</b><br>[to be completed by Democratic Services]  |                  |
| <b>Decisions plan reference:</b> |   |                  |
| <b>Report to and date/s:</b>     | <b>Democratic Renewal Working Party</b>   | 18 November 2014 |
|                                  | <b>Council</b>  | 16 December 2014 |
| <b>Portfolio holder:</b>         | Dave Ray<br>Portfolio Holder for Resources and Performance<br><b>Tel:</b> 01359 250912<br><b>Email:</b> david.ray@stedsbc.gov.uk  |                  |
| <b>Lead officer:</b>             | Peter Heard<br>Legal Services Manager<br><b>Tel:</b> 01638 719309<br><b>Email:</b> peter.heard@westsuffolk.gov.uk   |                  |
| <b>Purpose of report:</b>        | <p>This report seeks to provide a comprehensive set of options regarding Community Governance Review in the Borough for the Working Party to consider.</p> <p>It sets out background information about what has happened previously and details about the process and its cost and resource implications.</p> <p>In conclusion it proposes a way forward that the Working Party is asked to approve</p> |                  |
| <b>Recommendation:</b>           | <p><b>Democratic Renewal Working Party:</b></p> <p><b>The Working Party is asked to <u>RECOMMEND</u> to Council that:</b></p> <p>(1) the Council undertakes a Community Governance Review; and for that purpose:</p> <p>a. Council confirms that initial consideration and</p>  |                  |

|   |  |
|---|--|
|   | <p>targeted consultation with Borough Councillors, parish and town councils, the County Council, neighbouring councils, Members of Parliament and other community organisations (e.g. residents' associations) be undertaken to inform the preparation of Terms of Reference for the Review, taking into account the requests already received and the advice contained in this paper about future growth areas.</p> <p>b. Council requests this Working Party to consider the outcome of that consultation and report back to Council at its scheduled meeting in June/July 2015.</p> <p>c. Council allocates a budget for the review (this sum to be determined and identified to full Council once the Working Party's preferences for consultation are known). Council agrees the review timetable set out in Appendix 1, recognising that it will commence in 2015 and will not conclude before the May 2015 election.</p> <p>d. Council notes that any review will take effect from the parish and town council elections in 2019.</p> |
| <p><b>Key Decision:</b></p> <p><i>(Check the appropriate box and delete all those that <b>do not</b> apply.)</i></p>  | <p><i>Is this a Key Decision and, if so, under which definition?</i></p> <p>Yes, it is a Key Decision - <input type="checkbox"/></p> <p>No, it is not a Key Decision - <input checked="" type="checkbox"/></p>   |
| <p><i>The key decision made as a result of this report will be published within <b>48 hours</b> and cannot be actioned until <b>seven working days</b> have elapsed. This item is included on the Decisions Plan.</i></p> |  |
| <p><b>Consultation:</b></p>   | <ul style="list-style-type: none"> <li>• Consultation will form a major part of any Community Governance Review but has not yet commenced.</li> </ul>  |
| <p><b>Alternative option(s):</b></p>  | <ul style="list-style-type: none"> <li>• The options considered are set out in the main body of the report</li> </ul>  |
| <p><b>Implications:</b></p>   |  |
| <p><i>Are there any <b>financial</b> implications?<br/>If yes, please give details</i></p>  | <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <ul style="list-style-type: none"> <li>• These implications are examined in the main body of this report.</li> </ul>  |
| <p><i>Are there any <b>staffing</b> implications?<br/>If yes, please give details</i></p>   | <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <ul style="list-style-type: none"> <li>•</li> </ul>   |
| <p><i>Are there any <b>ICT</b> implications? If yes, please give details</i></p>  | <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <ul style="list-style-type: none"> <li>•</li> </ul>   |
| <p><i>Are there any <b>legal and/or policy</b> implications? If yes, please give details</i></p>  | <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <ul style="list-style-type: none"> <li>• These implications are examined in the main body of this report.</li> </ul>  |
| <p><i>Are there any <b>equality</b> implications?</i></p>   | <p>Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/></p>  |

| <i>If yes, please give details</i>   |   | <ul style="list-style-type: none"> <li>There has been no Equality Impact Assessment although this will be a factor to be taken account of in the CGR.</li> </ul> |                                       |
|--|---|--|---------------------------------------|
| <b>Risk/opportunity assessment:</b>  |   | <i>(potential hazards or opportunities affecting corporate, service or project objectives)</i>   |                                       |
| <b>Risk area</b>   | <b>Inherent level of risk (before controls)</b> | <b>Controls</b>  | <b>Residual risk (after controls)</b> |
| Failure to carry out a review in a timely fashion leading to governance issues                                     | Medium  | Ensure the guidance on considering reviews on a regular basis is met   | Low                                   |
| Review not conducted correctly leading to governance issues  | Medium  | Plan to abide by regulatory and guidance requirements  | Low                                   |
| <b>Ward(s) affected:</b>   |   | All Wards are potentially affected by a Borough wide review.   |                                       |
| <b>Background papers:</b><br><i>(all background papers are to be published on the website and a link included)</i> |   | Government Guidance on Community Governance Reviews March 2010   |                                       |
| <b>Documents attached:</b>   |   | <i>(Please list any appendices.)</i><br><b>Appendix A</b> - Illustrative Timetable<br><b>Appendix B</b> - Government Guidance                                    |                                       |

## **1. Key issues and reasons for recommendation(s)**

### **1.1 Previous Decision 2010**

- 1.1.1 A full review of community governance is usually carried out every 10-15 years. The last of these for the Borough were carried out in 1999/2000 and 2010/2011.
- 1.1.2 Parish Councils were consulted to propose matters of concern which were then considered. The 2010 review also specifically considered areas that were expected at that time to experience growth in the next ten years and that had the potential to extend beyond current parish boundaries, namely:
1. Fornham All Saints;
  2. Moreton Hall, Bury St Edmunds;
  3. Hanchett End, Haverhill; and
  4. North West Haverhill.
- 1.1.3 There was sufficient certainty about the last two areas for the proposals for boundary changes that arose to be dealt with in the review. As a result of the review the Council made certain specific amendments to parish boundaries, parish names and similar changes.
- 1.1.4 In relation to the first two areas, it was not felt that there was sufficient certainty at that time about future growth to be able to progress a review of boundaries. However, there was also specific consideration of a proposal to create a new Moreton Hall parish.
- 1.1.5 In November 2010, the Democratic Renewal Working Party concluded that the costs and the workload on staff of such a proposal could not be justified at that time, but that this issue be reconsidered a later date and recommended

*"That the consultation to create a new parish for Moreton Hall, Bury St Edmunds not be undertaken at the present time."*

- 1.1.6 The assumption at the time of the 2010 review was that another full review would not be conducted for another 10 to 15 years. However, there is nothing to prevent the Council from conducting a full or partial review before that time, and this report examines the options for doing so.

### **1.2 Cllr Beckwith's Notice of Motion - Moreton Hall – 2014**

- 1.2.1 On 30 June 2014 Cllr Beckwith proposed a motion to Council asking that a partial Community Governance Review (CGR) be carried out with a view to creating a Parish Council to encompass the existing borough council ward of Moreton Hall.
- 1.2.2 In proposing the motion Cllr Beckwith had regard to the expansion of the Moreton Hall area under Vision 2031 and giving residents a greater say on the issues affecting their lives.
- 1.2.3 In accordance with the Constitution the matter was referred the Democratic

Renewal Working Party and that has led to this report.

- 1.2.4 Before he submitted his motion to Council, Cllr Beckwith was advised in May 2014 (extract from original correspondence):

*".....it would depend on the circumstances as to whether or not the Council would require a petition to instigate a CGR. This is purely at the discretion of councillors (see next paragraph). However, the Council would have to carry out a CGR if it received a petition that met the legislative requirements. The requirements for a petition include specifying the area to which the review is to relate, which in turn dictates the number of electors affected and signatures required. Signatures from more than 10% of local electors in the petition area (where the number of electors is more than 2,500) then have to be obtained.*

*The Council could decide, without a petition, to proceed with a CGR of its own volition but, to do so, it would have to be properly persuaded of the case for the review and the views of the appropriate residents and stakeholders. The process for this may, therefore, be much the same as that required to work up a full and properly constituted petition submission, with supporting information. However, to avoid any unnecessary work, you may still prefer to discuss the matter with your fellow councillors before deciding whether to start to gather signatures, or not (see below).*

*The area to be included in any proposed new parish needs to be carefully considered. This and other information about the scope of the CGR will need to be included in the Terms of Reference approved by full Council. For example what account, in recognising the proposed new community grouping, should be taken of forthcoming and expected changes due to growth and new development; the effect on other existing areas (including the existing Bury St Edmunds parish) and the wider community; and so on. It may also be felt to be appropriate to widen any such CGR to other parts of the Borough which are also likely to experience housing growth under Vision 2031. We are already aware of interest in CGRs from other parish and town councils. These are all matters which will need to be considered by the Democratic Renewal Working Party when it advises full Council on the terms of reference.*

*Finally,...given the legal necessity for full consultation, it will be difficult logistically to complete and (if any changes are approved) implement any Community Governance Review (CGR) before March 2015, when the election period for the next scheduled parish elections in May 2015 starts. This will all depend on the eventual Terms of Reference for the review, as referred to above."*

- 1.2.5 During preparation of this report the issue of evidence supporting this proposal has been discussed with Cllr Beckwith. At present he has not sought to obtain a formal petition and the proposal rests on what he said in his motion. The Working Party will be updated on any information submitted before the meeting by Cllr Beckwith, who is also able to attend the meeting in person.

1.3 **Haverhill Town Council's request for a review September 2014**

- 1.3.1 The Council has received a request for a Community Governance Review at Haverhill. At the Haverhill Town Council meeting on 23rd September 2014, the following business was transacted:

*"C14 063 - Haverhill Parish Boundary  
Councillor P Hanlon referred to the 2000 houses and Science Park within the Haverhill 2031 vision document. None of these are actually in Haverhill Parish, but will depend upon all the facilities of the town. They should be in the same parish and contributing through the precept. Councillor Goody suggested that any change should take into account those areas likely to be zoned for future expansion as well as those already zoned. The Essex boundary, which passes through the town, also needs to be moved.*

*The meeting further noted that for health and other strategic planning the current situation would cause Haverhill's need to be greatly underestimated.*

*It was proposed by Councillor P Hanlon, seconded by Councillor E Goody, that the Clerk requests that St Edmundsbury Borough Council carries out a boundary review of the parish boundaries and approaches the Boundary Commission regarding the county boundary. The meeting voted unanimously in favour of this proposal."*

- 1.3.2 Haverhill Town Council has asked that the Borough accept this as an official request to review the parish boundary and to review the borough and county boundary with the Commission and other authorities. It was indicated that the Town Council has not "drawn a line" for itself but hopes that common agreement can be reached through negotiation.
- 1.3.3 It should be understood that although the Borough Council cannot change the county boundary between Essex and Suffolk in a CGR it should have consulted on the issue before it passes a request to the Local Government Boundary Commission for England to take up the matter.
- 1.3.4 The Commission has responsibility for changing the borough ward or county division boundaries following a community governance review (if these are requested). These are called 'consequential changes'. Proposals for consequential changes should be consulted on as part of a review and the recommendation made to the Commission. The Commission is then responsible for making the changes to the wards or divisions.

1.4 **Requests from other parish councils affected by growth**

- 1.4.1 The Council is aware of the desire of some parishes surrounding Bury St Edmunds affected by growth in Vision 2031 that the issue of their long-term boundaries be resolved before any new housing is occupied. These parishes have been advised that such a review could not be considered before adoption of Vision 2031 in autumn 2014, as to do so would appear to pre-

judge the outcome of that process which was still underway when the requests were first received. The same view was most recently expressed by parish councillors on the informal Town and Parish Liaison Group who have asked that another task and finish group be set up in autumn/winter 2014 to look at practical delivery issues for Vision 2031, including community governance. This request has been endorsed by the Rural Area Working Party at its meeting on 28 July 2014, and has the support of cabinet members. The intention to set up this group was announced at the Parish and Town Council Conference on 14 October 2014. While the setting up of this group does not commit the Council to a CGR (since it will look at a range of issues) it does mean that the Council will need to determine its approach to a future review of these boundaries before the end of 2014/15.

## **2. Key issues and reasons for recommendations**

### **2.1 What is a Community Governance Review (CGR)?**

2.1.1 A CGR is a review of the whole or part of the borough to consider one or more of the following:

- Creating, merging, altering or abolishing parishes;
- The naming of parishes and the style of new parishes;
- The electoral arrangements for parishes (the ordinary year of elections; council size, the number of councillors to be elected to the council, and parish warding), and
- Grouping parishes under a common parish council, or de-grouping parishes.

2.1.2 A CGR provides an opportunity for the council to review and make changes to community governance within their area. Such reviews can be undertaken when there have been changes in population or in reaction to specific, local issues to ensure that the community governance for the area continues to be effective and convenient and it reflects the identities and interest of the community.

2.1.3 The Council is required to ensure that community governance within the area under review will be:

- Reflective of the identities and interest of the community in that area;
- Effective and convenient;
- Efficient, and
- Results from consideration of the area on its own merits, having regard to its population, geography and pattern of communities.

2.1.4 In doing so the CGR is required to take into account:

- The impact of community governance arrangements on community cohesion; and
- The size, population and boundaries of a local community or parish

2.1.5 Other factors will also be considered such as:

- What impact proposed community governance arrangements might have

- on community cohesion; and
  - Whether the size (area), population and boundaries proposed for local governance make sense on the ground and contribute to the above criteria.
  - People’s sense of place and their historic attachment to areas.
- 2.1.6 The government has emphasised that recommendations made in CGR ought to bring about improved community engagement, more cohesive communities, better local democracy and result in more effective and convenient delivery of local services.

### **Undertaking a Community Governance Review**

#### **2.2 How is a CGR commenced?**

- (i) The Council *can* act on any request, or of its own volition, to undertake a Community Governance Review (CGR).
- (ii) The Council *must* act in response to a valid petition requiring a CGR. The main condition for validity of the petition is the number of signatures
- (a) for an area with less than 500 local electors, the petition must be signed by at least 50% of them
  - (b) for an area with between 500 and 2,500 local electors, the petition must be signed by at least 250 of them
  - (c) for an area with more than 2,500 local electors, the petition must be signed by at least 10% of them.

(Note: This obligation would not arise where, broadly speaking, there has been a review in the last two years)

- (iii) The petition must –
- (a) define the area to which the review is to relate (whether on a map or otherwise);
  - (b) specify one or more recommendations which the petitioners wish a community governance review to consider making; and
  - (c) define the area of any new parish, usually by a map, and if it proposes the alteration of the area of an existing parish, it must also define the area of that parish as it would be after alteration

The Council can meet the obligation to undertake a review requested by a petition either by taking forward this specific request as a discrete CGR or by dealing with it as a part of a wider review.

#### **2.3 What are the Terms of Reference of a Review?**

- 2.3.1 The Terms of Reference for a review define its scope and the matters or areas under consideration with an indication of the issues to be reviewed and the process and timetable for carrying it out. It includes details for the consultation process and the decision making required. The terms of reference must be publicised and consulted upon at the commencement of a review.



- 2.3.2 In setting the Terms of Reference for a review the Council should note the Government Guidance:

*Community governance reviews provide the opportunity for principal councils to review and make changes to community governance within their areas. It can be helpful to undertake community governance reviews in circumstances such as where there have been changes in population, or in reaction to specific or local new issues.*

*The general rule should be that the parish is based on an area which reflects community identity and interest and which is of a size which is viable as an administrative unit of local government. This is generally because of the representative nature of parish councils and the need for them to reflect closely the identity of their communities*

- 2.3.3 The Council is under a duty, when conducting a CGR, to “have regard to the need to secure that community governance within the area under review–  
(a) reflects the identities and interests of the community in that area, and  
(b) is effective and convenient.”

- 2.3.4 In addition, in deciding what recommendations to make, the council must take into account any other arrangements (apart from those relating to parishes and their institutions)–

- (a) that have already been made, or  
(b) that could be made,

for the purposes of community representation or community engagement in respect of the area under review.

## 2.4 **What Consultation is needed?**

- 2.4.1 Before making any recommendations or publishing proposals the Council will seek the views of local people and stakeholders. In particular it will include a range of consultation with:

- Local government electors
- Town and Parish Councils of affected parishes/towns
- Suffolk County Council
- Local District and County Councillors for affected area

Information will also be made available on the Council’s website.

- 2.4.2 The extent of consultation with electors of adjoining parishes or towns is a matter for decision. For example the consideration of a proposal for a Moreton Hall Parish could involve the requirement to consult all of the electors in the Bury Town Council area as they are all affected by the proposal. This consultation could be by individual letter linked to publicity and web based information.

- 2.4.3 It will be helpful to consider consultation in three stages. Often initial consultation that takes place before any decision to undertake a review is

made will prove useful in gauging public support for the process.

2.4.4 Subsequently a more comprehensive consultation takes place in the two stages of a review – firstly when a review and its Terms of Reference are announced and secondly when a draft proposal is made.

## 2.5 **Should the Council carry out a Community Governance Review?**

2.5.1 The Council, in considering whether to carry out a review of its own volition, will need to consider relevant factors.

2.5.2 One of these would be an indication of the views of the residents and other stakeholders of the area under review so it will be helpful to have sought a preliminary indication from them. The Council is obviously aware of the views of representatives of several local communities, as set out above.

2.5.3 Another will be an understanding of the area under consideration for review and the existing links and groups that make up the current community engagement mechanisms in the area.

2.5.4 The implications of not carrying out a review is the potential for newly developed housing to lead to anomalous situations where numbers of electors reside in a parish where the community representation or governance does not fit with the sense of community that they feel in practice. Residents on either side of the boundary of two parishes or a parish and town may use the same facilities but only those in one parish pay the precept for these, potentially leading to a sense of unfairness and injustice from the residents who do pay for them. Also the residents who are not able to vote for or join the parish or town council that controls these facilities, and represents their neighbourhood, may feel this undermines democracy and good governance.

2.5.5 It is important to stress that, although there might be recent precedent, the Borough Council does not have any policy on the moving of parish boundaries to reflect new growth, since each proposal must be taken on its own merits and any decision should reflect the views of local people and stakeholders. The process must be 'bottom up' if it is to reflect local community identity and needs. However, it can be advantageous to carry out a review to resolve the issue before any new homes are first occupied (even if any changes to boundaries cannot necessarily be implemented by this date), so that there is not confusion going forward i.e. parish/town councils have certainty about whom they will represent, and for whom they will need to provide services in the long-term, and householders know which parish their new home will be eventually be in.

2.5.6 It is also important to note that, while issues around community governance can often arise because of parish precepts (the level of them and to whom they go), this is not specifically mentioned in the guidance as a factor for consideration under a CGR. The guidance, instead, talks in general terms about providing "efficient", "effective" and "convenient" local government at parish level. Therefore, parish and town councils, in seeking a boundary change, must always primarily seek to explain why it will improve community governance for the residents of the affected properties, in accordance with

the tests outlined above. The same applies to the perceived financial value of particular postal addresses.

## 2.6 **What should be the scope of the review?**

2.6.1 The Council has the option of carrying out either

(a) Some specific reviews

- Of certain areas considered for a new parish or revision of parish boundaries where growth is expected; or
- Of that area and the surrounding affected town/parish, or

(b) A District wide review

- As before, of areas suggested by Parish Town Councils and other stakeholders, or
- Of the whole area; by undertaking a systematic review of all parts of the borough.

2.6.2 In practice a Community Governance review would be required to consider the community as it actually and prospectively stands without reference to existing arbitrary boundaries or divisions. This would entail a consideration of the wider area and of links with adjoining communities. For example, the implications of creating a new parish of Moreton Hall would be felt across the whole of Bury St Edmunds. Residents in other areas of the town may wish to propose creating a similar new parish where they lived.

2.6.3 To carry out separate consultations as each new proposal came forward would not be cost effective and, therefore, it may be advisable to include the whole borough in the consultation process to allow all residents to put forward their views.

2.6.4 It would also be necessary to bear in mind that if new parish boundaries didn't follow existing Borough or County Council boundaries, neighbours could be in the same parish, but different wards and/or county divisions. Where this occurs the result can be complicated for residents to understand so it is necessary to consider the effect on the parish being split between electoral wards or divisions for principal councils if the new boundaries do not follow existing boundaries. A request to the Commission for consequential changes may also be necessary (see above).

## 2.7 **Growth**

2.7.1 If considering housing growth then the following areas can be identified from a consideration of the plans set out for the Borough in Vision 2031 as being areas where the greatest growth is expected over the life of that Strategy:

1. Bury St Edmunds North West (also affecting the Parish of Fornham All Saints) – 950 homes
2. Bury St Edmunds West (also affecting Westley Parish) – 450 homes
3. Bury St Edmunds North East (also affecting Gt. Barton Parish) – 1250 homes
4. Bury St Edmunds South East (also affecting Rushbrooke/Rougham and

- Nowton Parishes) – 1250 homes
- 5. Moreton Hall Bury St Edmunds (also affecting Rushbrooke/Rougham and Great Barton Parishes) – 500 homes
- 6. Haverhill North West (also affecting the Parishes of Withersfield and Little Wratting) – 1150 homes
- 7. Haverhill North East (also affecting Kedington and Little Wratting Parishes) – 2500 homes

2.7.2 The figures above show the likely total extent of growth at each site. However, it is the growth in households at these sites over the next five to ten years which should be considered in the context of an immediate CGR. The projection for these areas over the next five and ten years is as follows (based on estimated figures supplied by the planning team).

| Area         | Five years (end 2018/19) | Ten Years (end 2023/24) | Total |
|--------------|--------------------------|-------------------------|-------|
| Bury NW      | 530                      | 420                     | 950   |
| Bury W       | 250                      | 200                     | 450   |
| Bury NE      | 150                      | 600                     | 750   |
| Bury SE      | 0                        | 225                     | 225   |
| Moreton Hall | 250                      | 250                     | 500   |
| Haverhill NW | 225                      | 550                     | 775   |
| Haverhill NE | 300                      | 1120                    | 1420  |

2.7.3 This suggests that there will be significant growth in electors over the next ten years and that, to consider whether or not this impacts upon parish governance or not, a CGR in 2015, that takes effect by 2019, could be timely if there is support for that to occur in local communities themselves.

## 2.8 **Guidance**

The Council should have regard to the Government Guidance and relevant extracts are set out in the Appendix B.

## 2.9 **Cost of a review**

2.9.1 Undertaking a limited review to deal with the requests received will involve a proportionate level of costs in the area. However, there is potentially a considerable cost involved in a large-scale CGR.

2.9.2 As explained above, who needs to be consulted on a CGR is a slightly grey area, particularly when new houses are yet to be occupied.

2.9.3 In relation to boundary proposals, if it is felt that those in adjoining parishes need to be directly consulted on growth proposals (i.e. one letter to each household, rather than each elector), then it would follow that all of the households of the town would also need to be consulted, in the interests of fairness. This would entail a large cost because there would be two outgoing letters required during the review. Money could be saved by setting up an internet response form supplemented by an easy postal option for those who didn't wish to use the online option. This would also cut down on staff time in collating responses.

- 2.9.4 The alternative would be to publicise the review widely but only consult directly the town and parish councils and residents' groups/associations, etc. This could be justified on the basis that the directly affected residents are not known, since their houses are yet to be built. Existing residents would still be able to take part and have their say (in the same ways as above), but they would not be contacted directly by letter to alert them to the review. Ward members would have a crucial role in helping to alert their constituents to the review. Local communities could also arrange for their own collective responses e.g. petitions, public meetings, etc. This method of consultation would mean that the costs of carrying out the review could mostly be accommodated within existing budgets.
- 2.9.5 There isn't a right or wrong answer, provided that the approach is fair and equally accessible to all parties. Clearly, however, the first option is more inclusive and ensures no household can claim to be unaware of the review. However, it carries a large cost premium (see below). This premium would be increased significantly if a letter was sent to each individual elector rather than each household.
- 2.9.6 The timing of reviews will have a bearing on cost too. In the case of the expansion of the two towns, there will be a considerable overlap of growth proposals insofar as the two town councils and their residents are concerned, and therefore a rolling programme could involve some diseconomies of scale if they were consulted repeatedly. If consequential changes to Borough or County boundaries also result, it would also be easier to seek the consent of the Commission for these as one process. However, a single review of that magnitude could mean that extra staff capacity would be needed on a temporary basis.
- 2.9.7 In the case of a review of the existing parish arrangements within Bury St Edmunds (i.e. Cllr Beckwith's proposal), again a consistent decision on consultation would need to be taken. It would not be fair to write only to households on Moreton Hall, since there would be an impact of parishing on all residents in Bury St Edmunds. So, again, the two choices are to write to everyone in Bury St Edmunds, or write to no-one other than organisations (but publicise the review widely to residents through other means). Clearly, whichever method is chosen, there would be no additional cost of a Bury St Edmunds parishing review unless it was undertaken in isolation to a wider CGR, or a different means of consultation was chosen for the two different processes for any reason.
- 2.9.8 There is no current budgetary provision for this process; therefore, a proposal for a review of any kind would need to be put forward for consideration as a one-off growth bid part of the budget setting process. Calculating a detailed budget will not be possible until it is known which option the Working Party wants to recommend, so this will need to be done between this meeting and full Council in December. All that can be done at this stage is to indicate likely costs for various elements of the process, and options within those elements.
- 2.9.9 The following table gives an indication of the anticipated costs involved in a consultation involving letters being sent to every household in parishes affected by Vision 2031 growth proposals. If additional requests for reviews

were received from other parishes, those costs would be additional. The estimates below assume that the main response method is by detailed online survey (with the chance to have a survey form sent on request for those without internet access). Assuming, say, a 50% response rate, offering everyone a postal survey instead (ie. a paper form included with the letter and a freepost reply envelope) would be likely to add at least an additional 25% or 50% to the costs below depending on whether it was offered for one or both of the consultation stages.

| Parish Area             | Current Households | Printing (£)<br>(2 letters) | Postage (£)<br>(2 letters) | <b>Total (£)</b> |
|-------------------------|--------------------|-----------------------------|----------------------------|------------------|
| Bury St Edmunds         | 18,923             | 1,892                       | 18,923                     | <b>20,815</b>    |
| Fornham All Saints      | 333                | 33                          | 333                        | <b>366</b>       |
| Great Barton            | 912                | 91                          | 912                        | <b>1,003</b>     |
| Haverhill               | 10,786             | 1,078                       | 10,786                     | <b>11,864</b>    |
| Kedington               | 764                | 76                          | 764                        | <b>840</b>       |
| Little Wratting         | 67                 | 6                           | 67                         | <b>73</b>        |
| Nowton                  | 79                 | 7                           | 79                         | <b>86</b>        |
| Rushbrooke with Rougham | 515                | 51                          | 515                        | <b>566</b>       |
| Westley                 | 80                 | 8                           | 80                         | <b>88</b>        |
| Withersfield            | 216                | 21                          | 216                        | <b>237</b>       |
| <b>Total</b>            | <b>32,675</b>      | <b>3,267</b>                | <b>32,675</b>              | <b>35,942</b>    |

- 2.9.10 The table above shows that a minimum budget of around £36,000 could be required to write twice to every household in Bury St Edmunds and Haverhill and the surrounding parishes which will be affected by Vision 2031 growth sites. This cost could increase to between £50,000 and £60,000 if paper survey forms/freepost reply envelopes were to be offered for both consultations (or over £45,000 if just for one).
- 2.9.11 The alternative to the above would be to carry out the consultations without writing to every household, and to rely on other means of publicity. The cost would be substantially lower, but it may still be sensible to make a provision of £5,000 to cover incidental costs e.g. press notices, posters, etc.
- 2.9.12 The cost of staff time also needs to be taken into account, either as an opportunity cost (i.e. time lost for other projects) and/or a direct cost (if additional temporary resources are obtained).
- 2.9.13 There is likely to be staff requirement of around 0.2FTE for the full extent of the review envisaged above (setting up consultations, writing reports, attending meetings, consequential changes, implementing new provisions, etc). There will also be a staff requirement in Communications. This would go up or down slightly depending on how many parishes were involved, although not hugely, since a lot of this cost is fixed. This cost would be an opportunity cost of the time of an existing officer not available for other projects.
- 2.9.14 On top of that staff cost, an allowance is needed to process consultation responses. Online survey software analyses responses to fixed questions/options automatically, so this doesn't involve any staff time. However, if a "free-text" response option is offered in a survey (i.e. text box(es) to

complete as desired) it can take a day to analyse 1000 forms. This applies whether the survey is online or postal. If a postal survey is offered, however, additional time is needed for data entry. A skilled member of staff can process around 20 forms an hour so this means that an additional 50 hours of staff time is needed for every 1000 forms.

- 2.9.15 The cost of any review falls to the authority. The source of the funding will be identified to full Council.

## 2.10 **Timescale**

- 2.10.1 The time taken for a review is dependent on its Terms of Reference and scope. Small ad hoc reviews of single parishes recently undertaken in Forest Heath have taken six months approximately due to the various stages of consultation needed. In those instances the internal deliberations needed have been very short as the matters were not complex, which would not apply in the case of a Vision 2031-based CGR. At St Edmundsbury the constitution requires that proposals must be considered by this Working Party which then reports to full Council. The review can only commence when Full Council has decided to proceed.

- 2.10.2 The constraint that is set down in guidance is that, once terms of reference are agreed, the review should be completed within a twelve month period, and for a large review it is sensible for this amount of time to be allowed for in planning terms, particularly if there is no intention to incur the additional cost of convening special council meetings.

- 2.10.3 The implementation of a review will be linked to the usual date of election for Parish/Town Councils, which in practical terms means that a review must be concluded in time for the election process. For the 2015 elections, this would be by the end of March 2015. Given a likely timetable of 9-12 months for a review (and the adoption date of Vision 2031), this does mean that it is not possible to complete any reviews in time for implementation in 2015. Instead, changes would be most likely to be brought in for the 2019 elections. Any consequential changes to Borough and County arrangements would also be made in 2019 and 2021 respectively.

- 2.10.4 If a review did lead to changes (which is by no means certain) this may mean that, for a small number of occupiers of new housing built under Vision 2031, their electoral parish/ward/division could potentially change within a short period of them moving in, although they would be likely to know this when making their initial purchase or rental decision. However, completing a review within the next year or so would ensure that a CGR was implemented ahead of the large majority of future growth of the towns occurring.

- 2.10.5 An indicative timetable for a full review is attached as Appendix A.

## 2.11 **Conclusion**

- 2.11.1 It is concluded that strongest case for undertaking a Community Governance Review lies with the review of the identified areas of growth. Outcomes of the review could cover creation of parishes (or not), alteration of boundaries (or not) and possibly merging parishes.

- 2.11.2 At the same time the opportunity should be taken to pick up any other minor changes and anomalies that are raised by Parish/Town Councils.



**Illustrative Timetable for A Community Governance Review**

| <b>Stage</b> | <b>Action</b>                                  | <b>Timeline</b>        | <b>Outline of Action</b>   |
|--------------|--|------------------------|--|
| 1            | Report to full Council                         | December 2014          | Consider recommendation from this Working Party to carry out a review and consult on terms of reference  |
| 2            | Targeted consultation on terms of reference    | January to March 2015  | Submissions invited from community groups and representatives regarding terms of reference for review  |
| 3            | Working Party meeting                          | April 2015             | Working Party considers consultation and proposes detailed terms of Reference  |
| 4            | Report to full Council                         | June/July 2015         | Council approves principle of review and its terms of reference.   |
| 5            | Publish terms of reference                     | July 2015              | Council publishes terms of reference and notifies stakeholders of the commencement of the review   |
| 6            | Invite initial submissions                     | July to October 2015   | Initial submissions invited.<br><br><ul style="list-style-type: none"> <li>• Consultation with parish councils and residents</li> <li>• Consultations with parish and borough councillors</li> <li>• Local groups and interested parties to be consulted</li> <li>• Information pack to be sent as requested</li> </ul> Representations/proposals to be sent to Borough Council. |
| 7            | Consider Submissions                           | October/ November 2015 | Working Party considers submissions and prepares draft recommendations for report to Council (December 2015.)  |
| 8            | Publish and consult upon draft recommendations | January to April 2016  | Publish draft recommendations for further consultation.  |
| 9            | Make final recommendations                     | May/June 2016          | Consider further submissions and prepare final recommendations for report to council (June/July 2016).   |
| 10           | Publish final recommendations                  | July 2016              | Publish final recommendations and make Order   |

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## **Extracts from Government Guidance**

### **1. Growth Area Guidance Paras 15, 147 and 178**

15 In many cases making changes to the boundaries of existing parishes, rather than creating an entirely new parish, will be sufficient to ensure that community governance arrangements to continue to reflect local identities and facilitate effective and convenient local government. For example, over time communities may expand with new housing developments. This can often lead to existing parish boundaries becoming anomalous as new houses are built across the boundaries resulting in people being in different parishes from their neighbours. In such circumstances, the council should consider undertaking a community governance review, the terms of reference of which should include consideration of the boundaries of existing parishes

147 The purpose of a review undertaken by a principal council, or a petition from the electorate, is likely primarily to concern the administrative boundaries of a new or existing parish. This might be in the light of growth from within an existing parish or a locally identified need for a new form of community governance. However, in addition to these primary concerns, principal authorities will also need to consider the governance of new or altered parishes. The principal council must have regard to the need for community governance within the area under review to reflect the identities and interests of the community in that area, and to ensure that the governance is effective and convenient.

178 When considering the electoral arrangements for a parish, whether it is warded or not, the principal council must also consider any change in the number or distribution of the electors which is likely to occur in the period of five years beginning with the day when the review starts. The most recent electoral register should be used to gain an accurate figure for the existing electorate. Planning assumptions and likely growth within the area, based on planning permissions granted, local plans or, where they are in place, local development frameworks should be used to project an accurate five year electorate forecast. This ensures that the review does not simply reflect a single moment but takes account of expected population movements in the short- to medium-term.

### **2. District wide review Guidance Paras 26,27**

26 Principal councils will want to keep their community governance arrangements under review, and they should ensure that they consider on a regular basis whether a review is needed. A review may need to be carried out, for example, following a major change in the population of a community or as noted earlier in this chapter (see paragraph 15) to re-draw boundaries which have become anomalous, for example following new housing developments being built across existing boundaries. Principal councils should exercise their discretion, but it would be good practice for a principal council to consider conducting a review every 10-15 years – except in the case of areas with very low populations when less frequent reviews may be adequate.

In the interests of effective governance, the principal council should consider the benefits of undertaking a review of the whole of its area in one go, rather than carrying out small scale reviews in a piecemeal fashion of two or three areas. However, it is recognised that a full-scale review will not always be warranted, particularly where a review of the whole area or a significant part of the principal

council's area has been carried out within the last few years. Occasionally, it may be appropriate to carry out a smaller review, for example, to adjust minor parish boundary anomalies.