

# 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> [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
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<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? 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? 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> <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> <b>Appendix A</b> - Illustrative Timetable <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 (£) (2 letters)	Postage (£) (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.