



**DOVER
DISTRICT
COUNCIL**

**Response to LGBCE Draft
Recommendations for Dover
District Council**

7 August 2018

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Contents

<u>Section</u>	<u>Page</u>
Foreword from the Chief Executive, Nadeem Aziz	3
Part 1 Development of Response	5
• Draft Recommendations of the LGBCE	5
• How the Council Developed its Response	5
Part 2 Dover District Council's Response to LGBCE Draft Recommendations	7
• Area 1	7
➤ Eastry Rural Ward	
➤ Little Stour & Ashstone Ward	
➤ Sandwich Ward	
• Area 2	9
➤ Middle Deal Ward	
➤ Mill Hill Ward	
➤ North Deal Ward	
➤ Walmer Ward	
• Area 3	10
➤ Guston & St Margaret's-at-Cliffe Ward	
➤ Kingsdown Rural Ward	
➤ Whitfield Ward	
• Area 4	11
➤ Aylesham & Eythorne Ward	
• Area 5	12
➤ Capel-le-Ferne & River Ward	
➤ Dover Downs Ward	
• Area 6	15
➤ Buckland Ward	
➤ Maxton and Elms Vale Ward	
➤ St Radigunds Ward	
➤ Tower Hamlets Ward	
➤ Town and Castle Ward	
• Parish Council Electoral Arrangements	16

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Foreword



Nadeem Aziz
Chief Executive

This submission is the formal response of Dover District Council to the invitation from the Local Government Boundary Commission for England (LGBCE) in respect of its draft recommendations for the new wards for a future council size of 32 members.

The Council has chosen to note the LGBCE's recommendations in most areas with the exception of the proposed Capel-le-Ferne and River Ward which the full Council felt did not adequately reflect the differing interests and identities of the local communities concerned. This submission therefore sets out evidence that the Council believes will support its position for 2 single member wards as opposed to the proposed two member ward. The submission also proposes some minor adjustments in respect of proposed boundaries and parish warding arrangements.

I hope that the LGBCE will find the proposals contained within this submission to be useful in developing its final recommendations and I look forward to the publication of the final recommendations on 2 October 2018.

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Part 1 – Development of Response

Draft Recommendations of the Local Government Boundary Commission for England

The Local Government Boundary Commission for England (LGBCE) is currently undertaking an Electoral Review of the Dover District with a view to the new electoral arrangements being in place for the May 2019 full council elections. The review consists of 2 stages – council size and ward patterns.

The Council submitted its proposals for a council size of 32 councillors, a reduction of 13 councillors, following the extraordinary meeting of the full Council held on 6 December 2017. On 30 January 2018 the LGBCE announced that it was minded to recommend a council size of 32 councillors and launched the second stage of the review process with a public consultation inviting proposals for new warding arrangements for Dover District Council. That consultation ran from 30 January 2018 to 9 April 2018 and following it the LGBCE published its recommendations for a new pattern of wards on 5 June 2018.

This launched a second stage of consultation running from 5 June 2018 to 13 August 2018 and invited views on the LGBCE's proposal for 32 councillors elected from 18 wards. The proposals would see 1 x 3 member ward, 12 x 2 member wards and 5 x 1 member wards.

How did the Council develop its response?

As with previous stages in the Electoral Review, an officer group led by the Director of Governance developed the initial proposals and these were considered by the Electoral Matters Committee. The five-member Electoral Matters Committee in turn made recommendations to the full Council which made the final decision.

(a) Electoral Matters Committee

Following the publication of the LGBCE's recommendations on 5 June 2018, an initial response was drafted for consideration by the members of the Electoral Matters Committee at its meeting held on 27 June 2018.¹ In summary, these recommendations were:

- To support the LGBCE's draft recommendations for Council Wards.
- To recommend that the name of the Aylesham and Eythorne Ward be changed to Aylesham, Eythorne and Shepherdswell.
- To recommend that Walmer Parish Council be composed of three parish wards as opposed to the LGBCE proposed two parish wards.

The Council's Electoral Matters Committee made a number of changes and it was recommended to the full Council meeting held on 25 July 2018 that:

¹ Draft Recommendations On The New Electoral Arrangements For Dover District Council, Report of the Chief Executive, Electoral Matters Committee, 27 June 2018 <http://moderngov.dover.gov.uk/documents/s27292/Appendix%201%20-%20Proposed%20response%20the%20LGBCE%20consultation%20on%20the%20recommended%20New%20Electoral%20Arrangements%20.pdf>

- The LGBCE's draft recommendations for Council Wards be supported with the exception of the Capel-le-Ferne and River Ward.
- To recommend that the two member Capel-le-Ferne and River Ward be split into two single member wards on grounds of community identity.
- To recommend that the name of the Aylesham and Eythorne Ward be changed to Aylesham, Eythorne and Shepherdsweil Ward.
- To recommend that Walmer Parish Council be composed of three parish wards as opposed to the LGBCE proposed two parish wards.
- To recommend that a small number of properties adjacent to the River Dour be moved from the St Radigund's Ward to the Buckland Ward.

These responses were set out as Appendix 2 to the report submitted to the full Council on 25 July 2018.²

(a) Council

The full Council accepted the recommendations of the Electoral Matters Committee in full subject to one further amendment. This was to change where in previous drafts it had stated that the Council *supported* the LGBCE recommendations to that of the Council *noting* the LGBCE recommendations. The reason for this change was to give councillors the freedom to make individual submissions where they did not agree with the LGBCE draft recommendations.

The full Council's agreed final response forms the basis of this submission.

² Draft Recommendations On The New Electoral Arrangements For Dover District Council, Report of the Chief Executive, Council 25 July 2018, Appendix 2 <http://moderngov.dover.gov.uk/documents/s27559/Appendix%20-%20EMC%20Recommendations%20to%20Council%20with%20officer%20comments.pdf>

Part 2 – Dover District Council Response

The following sets out the Council's response to the LGBCE's draft recommendations on a ward-by-ward basis.

Area 1: Eastry Rural, Little Stour & Ashstone and Sandwich

Local Government Boundary Commission for England Ward Proposals:

Ward Name	Number of Councillors	Variance 2023
Eastry Rural	2	-1%
Little Stour and Ashstone	2	+4%
Sandwich	2	-1%

Dover District Council Response:

The Council notes the proposed pattern for these wards.

Consultation Question Response

As part of the consultation, the LGBCE makes the following statement(s)/comment(s) and asks the question or seeks views (in italics):

Q1. Several submissions were received regarding the parish of Sholden. These submissions uniformly opposed Dover District Council's proposal to link the parish of Sholden with an area of Deal. The respondents argued that Sholden is not linked with Deal; the Council's proposal linked the parish with the northern part of the town. Residents argued that the Council's proposal linked two areas that have significant differences. We are therefore proposing to include the parish of Sholden in the proposed Eastry Rural ward, with the exception of the area that lies to the east of the railway line. We note that this area has no road links with the rest of the parish of Sholden, and we consider that the railway line forms a strong and identifiable boundary. We are therefore proposing to include this area in the proposed North Deal ward, as proposed by the Labour Group and by a local resident. We are also proposing to include the housing around Hyton Drive and Church Meadows in the proposed Middle Deal ward, to allow residents on Hyton Drive and Cornfield Row access into the road without leaving the ward. We consider that evidence received supported the village of Sholden being included in the more rural Eastry Rural ward. ***We would particularly welcome submissions regarding this area during the consultation on the draft recommendations.*** (Paragraph 42)

A1. The Council notes the proposal to include the housing around Hyton Drive and Church Meadows within the proposed Middle Deal Ward.

The Council also notes the proposal to include the area to the north of Golf Road that is to the east of the railway line within the North Deal Ward.

Area 2: Deal and Walmer

Local Government Boundary Commission for England Ward Proposals:

Ward Name	Number of Councillors	Variance 2023
Middle Deal	2	-1%
Mill Hill	2	+4%
North Deal	2	-2%
Walmer	2	+4%

Dover District Council Response

The Council notes the proposed pattern for these wards and has nothing to add to the comments made under the Eastry Rural, Little Stour & Ashstone and Sandwich Wards in relation to North and Middle Deal Wards.

Consultation Question Response

The LGBCE does not ask a specific question as part of the consultation on these wards.

Area 3: Guston and St Margaret's-at-Cliffe, Kingsdown Rural and Whitfield

Local Government Boundary Commission for England Ward Proposals:

Ward Name	Number of Councillors	Variance 2023
Guston & St Margaret's-at-Cliffe	1	-2%
Kingsdown Rural	1	7%
Whitfield	2	-7%

Dover District Council Response:

The Council notes the proposed pattern for these wards.

In respect of the proposed Whitfield Ward, the Council understands and notes the electoral equality and topographical reasoning behind the decision to create the proposed Dover Town Council Rokesley parish ward and include it within the Whitfield Ward at district level. We recognise that the LGBCE cannot alter the external boundaries of parish councils and this supports the logic of creating a new parish ward within the boundaries of Dover Town Council. In addition, there is anecdotal evidence that many of the children in the area of the Rokesley parish ward attend the nearby Green Park Community Primary School, which is within the administrative area of Dover Town Council.

We also recognise that the -7% variance for the Whitfield Ward allows for future housing growth beyond 2023.

Consultation Question Response

The LGBCE does not ask a specific question as part of the consultation on these wards.

Area 4: Aylesham and Eythorne Ward

Local Government Boundary Commission for England Ward Proposals:

Ward Name	Number of Councillors	Variance 2023
Aylesham and Eythorne Ward	3	0%

Dover District Council Response:

The Council notes the proposed pattern for these wards.

The Council recognises that the 0% variance for the Aylesham and Eythorne Ward allows for future housing growth beyond 2023.

Consultation Question Response:

As part of the consultation, the LGBCE makes the following statement(s)/comment(s) and asks the question or seeks views (in italics):

Q2. Our proposed three-councillor Aylesham & Eythorne ward comprises the parishes of Aylesham, Eythorne, Nonington, and Shepherdswell with Coldred, and would have a variance of 0% by 2023. Whilst we acknowledge that this proposed ward would combine a number of different communities, we consider that this is preferable to splitting any of the constituent communities between wards for the sake of achieving electoral equality. This proposal is based on the submission made by Eythorne Parish Council, and ***we would particularly welcome submissions regarding this proposed ward, and the name of the ward, during the consultation on the draft recommendations.*** (Paragraph 70)

A2. As previously stated, the Council notes the proposed pattern for these wards. There are three main communities within this proposed ward - Aylesham, Eythorne and Shepherdswell. Although we recognise the desire to keep ward names reasonably concise, it is our view that the community in the south of the proposed ward (Shepherdswell) be reflected in the name of the ward and to that end the Council suggests a new ward name to become Aylesham, Eythorne & Shepherdswell Ward. This also has the advantage of continuing the names of the two previous wards that comprise this electoral area.

Area 5: Capel-le-Ferne and River Ward and Dover Downs Ward

Local Government Boundary Commission for England Ward Proposals:

Ward Name	Number of Councillors	Variance 2023
Capel-le-Ferne and River	2	-7%
Dover Downs	1	5%

Dover District Council Response:

The Council proposes a new ward pattern for the proposed 2 member Capel-le-Ferne and River Ward based on two 1 member wards as follows:

Ward Name	Polling Districts	No. of Cllrs	Electorate 2023	Variance 2023
River	PRV	1	3,042	+4.8%
Capel-le-Ferne	PCF, PHM	1	2,345	-19.2%

In developing a response to the LGBCE proposal, consideration has to be given to the statutory criteria to which the LGBCE is working. These are as follows:

- (a) Electoral equality: each local councillor represents a similar number of voters
- (b) Community identity: reflects the identity and interests of local communities
- (c) Effective and convenient local government: helping your council discharge its responsibilities effectively

In developing alternative proposals, the Council has sought to address each of the criteria.

(a) Electoral Equality

When considered in terms of electoral equality alone it is acknowledged that there would be issues in splitting the proposed ward along polling district lines to create a River Ward based on polling district PRV and a Capel-le-Ferne Ward based on polling districts PCF and PHM as this would create one ward with a variance of greater than +/-10%. However, it is the view of the Council that despite this the community identity of the residents of River and Capel-le-Ferne/Hougham Without would be better served through the creation of two single member wards.

Ward Name	Polling Districts	No. of Cllrs	Electorate 2023	Variance 2023
River	PRV	1	3,042	+4.8%
Capel-le-Ferne	PCF, PHM	1	2,345	-19.2%

The Council in drawing up an alternative proposal has avoided changing any of the neighbouring recommended wards (i.e. using part of the neighbouring Dover Downs Ward to bolster the electorate for Capel-le-Ferne) and instead has focussed on an alternative ward pattern based on the polling districts PRV (River), PCF (Capel-le-Ferne) and PHM (Hougham) only.

As the table above demonstrates, any alternative ward pattern would therefore have to be justified on grounds other than electoral equality for a Capel-le-Ferne Ward.

(b) Community Identity

The communities of Capel-le-Ferne and River are at the opposite ends of the ward proposed by the LGBCE. The proposals for an alternative ward pattern will therefore look at the connections between River and Capel-le-Ferne and to a lesser degree between Capel-le-Ferne and Hougham Without.

In drawing up these alternative proposals, officers have discounted splitting the River polling district to provide additional electors to the Capel-le-Ferne Ward on the basis that it would be contrary to the community identity of River residents.

i. Geography

The Alkham Valley forms part of the boundary for the ward and it is bracketed by the town of Dover to the North and Folkestone to the South. The rural parishes of Capel-le-Ferne and Hougham Without are part of the raised valley side leading to the White Cliffs whilst the urban parish of River is located at the mouth of the Alkham Valley.

The civil parish of River borders the town of Dover and forms part of the Dover Town Division for Kent County Council.

The civil parish of Capel-le-Ferne borders the town of Folkestone (part of Folkestone and Hythe District Council) and several dwellings within the village of Capel-le-Ferne are part of the town of Folkestone rather than the civil parish of Capel-le-Ferne.

ii. Schools

The closest secondary schools for residents in River and Capel-le-Ferne are in Dover and Folkestone respectively. In respect of primary schools, both Capel-le-Ferne (Capel-le-Ferne Primary School) and River (River Primary School) are served by their own schools. The nearest primary school for Hougham would be Capel-le-Ferne Primary School.

iii. Ecclesiastical Parishes

The Church of England ecclesiastical parishes for Capel-le-Ferne, Hougham and River are separate from each other, reflecting the civil parish boundaries. However, Capel-le-Ferne and Hougham form part of the Alkham with Capel-le-Ferne and Hougham Benefice whilst River is in the River Benefice.

iv. Road Links

The main roads within the ward proposed by the LGBCE are the Folkestone Road and the A20. However, both of these roads connect to Capel-le-Ferne to Dover as opposed to River and therefore anyone travelling from River to Capel-le-Ferne or Hougham using these routes would be required to travel outside of the proposed ward to use them.

The Alkham Valley Road, which for most residents would be the other alternative transport route is outside of the boundaries proposed by the LGBCE and is instead in the Dover Downs Ward.

For residents of the LGBCE proposed Capel and River Ward to travel from River to Capel-le-Ferne and stay within the ward confines they would need to use Minnis Lane or Crabble Lane which connect to Abbey Road and then join Capel Street. These roads are not primary routes. Abbey Road is low traffic single lane country road of a single vehicle width, requiring vehicles to pull into passing points to pass safely.

The communities of Church Hougham and West Hougham do have road connections with Capel-le-Ferne that would enable travellers to stay within both the LGBCE proposed ward and the alternative Capel-le-Ferne Ward proposed by the Electoral Matters Committee. However, for travel from either Church Hougham or West Hougham to River the same problems that applied travelling from River to Capel would apply.

v. Public Transport Links

Bus – There is no direct bus route from Capel-le-Ferne to River.

The main bus routes are as follows:

Route	Bus Changes	Journey Time	Direct Road Distance
Capel Street (Capel-le-Ferne) to Common Lane (River)	1 – Pencester Road, Dover	51 minutes	3.8 miles
Capel Street (Capel-le-Ferne) to Minnis Lane (River)	1 – Grove Road/Morrison Road, Folkestone	47 Minutes	3.1 miles

Bus – There is no direct bus route from West Hougham to River.

The main bus route is as follows:

Route	Bus Changes	Journey Time	Direct Road Distance
Hougham Court Lane (West Hougham) to Common Lane (River)	1 – Pencester Road, Dover	1 hour 16 minutes	4.6 miles

Train – There are no train stations at Capel-le-Ferne or West Hougham. River has a train station (Kearsney Abbey) on the Dover to London line.

(c) Efficient and convenient local government

Both the LGBCE Proposal and the Alternative Proposal set out above would provide for efficient and convenient local government in administrative terms.

Area 6: Dover Town

Local Government Boundary Commission for England Ward Proposals:

Ward Name	Number of Councillors	Variance 2023
Buckland	2	-7%
Maxton and Elms Vale	1	+5%
St Radigunds	2	-2%
Tower Hamlets	1	+2%
Town and Castle	2	+8%

Dover District Council Response:

The Council notes the proposed pattern for these wards. However, it is recommended that a small amendment be made to the proposals for St Radigunds and Buckland.

This amendment which would affect fewer than 40 voters would see Cawsey Cottages and The Old Flour Mill (Lorne Road) and the adjoining 113 London Road transferred from the St Radigunds Ward to the Buckland Ward. This would have the effect of extending the ward boundary line in Lorne Road beyond its proposed end at the River Dour to include these properties.

Consultation Question Response:

As part of the consultation, the LGBCE makes the following statement(s)/comment(s) and asks the question or seeks views (in italics):

Q4. We consider that the proposals for Dover put forward by the Labour Group are the most representative of the evidence we have received during the consultation. We are therefore proposing to include Alfred Road and Brookfield Place in the proposed Buckland ward, as we consider that the River Dour here provides for a strong boundary between Buckland and St Radigunds; this change also improves the electoral equality in the proposed Buckland ward. We consider that this ward follows strong and identifiable boundaries, and reflects Buckland's geographical position in Dover, but ***we would welcome submissions regarding this ward during the consultation on the draft recommendations.*** (Paragraph 82)

A4. In drafting the original proposals Council officers had considered similar options using the River Dour as a ward boundary and while ultimately a decision was taken to pursue a different option the Council notes the proposal of the LGBCE to include Alfred Road and Brookfield Place within the proposed Buckland Ward.

Parish Electoral Arrangements

Local Government Boundary Commission for England Ward Proposals:

The LGBCE is proposing amendments to parish wards in respect of three areas – Dover Town Council, Sholden Parish Council and Walmer Parish Council.

Dover Town Council

Parish Ward Name	Number of Parish Councillors
Buckland	4
Maxton and Elms Vale	2
Rokesley	1
St Radigunds	4
Tower Hamlets	2
Town and Castle	5

Dover District Council Response:

The Council notes the proposed pattern for these wards.

Sholden Parish Council

Parish Ward Name	Number of Parish Councillors
Hyton	2
Sholden	4
Tenants Hill	1

Dover District Council Response:

The Council notes the proposed pattern for these wards.

Walmer Parish Council

Parish Ward Name	Number of Parish Councillors
Gladstone	2
Walmer	13

Dover District Council Response:

While the Council recognises the changes in respect of the southern ward boundary of North Deal Ward and the subsequent need to create the revised Gladstone Parish Ward, it is concerned that the proposed Walmer Parish Ward of Walmer is too large in terms of the criteria of effective and convenient local government. This has a number of aspects as follows:

- Walmer previously had four parish wards (Upper Walmer; Lower Walmer, Wellington; Lower Walmer, St Saviour's; and Gladstone) which allowed for a more representative distribution of councillors with more manageable electorates.
- The number of candidates (13) in the largest of the two parish wards risks over/under voting and voter confusion/apathy due to the number of candidates.

- Administratively we are concerned that in a contested election the size of the ballot paper could cause difficulties and that there would be a financial burden on the parish council in the event of a by-election for the largest parish ward.

It is the Council's view that these issues could be overcome by dividing the proposed Walmer Parish Ward of Walmer into two smaller parish wards. We propose that these be as follows:

Parish Ward Name	Number of Parish Councillors
Gladstone	2
Lower Walmer	7
Upper Walmer	6

The Gladstone Parish Ward would remain unchanged from the LGBCE proposals while the subdivided Walmer Parish Ward would be split along the boundary of current polling district AA1 (Upper Walmer Parish Ward) to create the parish wards of Upper Walmer and Lower Walmer.

