

**Knag, Daniel**

---

**From:** Knag, Daniel  
**Sent:** 24 June 2010 16:14  
**To:** [REDACTED]  
**Subject:** FOI Request response  
**Attachments:** LGBCE (10)17 Review programme 2010-11.doc; LGBCE (10)17 Review programme 2010-11 App B 2010\_04\_22 FER investigations 2010.xls; LGBCE (10)17 Review programme 2010-11 Appendix A\_2010\_05\_07\_LGBCE\_timetable.xls  
[REDACTED]

**Our Ref: FOI 01/10**

Thank you for your request dated 10 June 2010, clarified on 14 June 2010, for information under the Freedom of Information Act (FOI Act).

The Commission aims to respond to requests for information promptly and within the statutory timeframe of twenty working days.

Please find your request below in bold together with our response.

***'Any information held by the Commission (whether in correspondence, internal reports, business planning documents or other relevant materials) in relation to any plans it has to conduct a local government boundary review within any local authority in London.'***

You clarified that your request ***relates to both electoral boundary and administrative boundary reviews.***

The Commission does hold information relevant to your request.

By way of background, the Local Government Commission for England was established on 1 April 2010, when it took on the functions of the Boundary Committee for England. Its remit with regard to electoral and external boundary reviews (principal area boundary review or PABR) remains the same. As a consequence, it has inherited information that was held by the Boundary Committee prior to 1 April 2010.

In respect of PABRs, I can confirm that the Commission has not discussed any plans to carry out such a review in London and therefore there is no information to provide.

In respect of electoral reviews, the Commission has discussed the potential for carrying out electoral reviews of certain London boroughs where electoral variances have developed since the last round of electoral reviews in London in the 1990s. The relevant report and appendices are attached. The minutes of the meeting at which the report was discussed are available for download from the following webpage;

<http://www.lgbce.org.uk/documents/lgbce-documents/minutes/lgbce/2010/minutes-lgbce-10-2nd.pdf>

As you will see, the Commission did identify two London boroughs that met the criteria

for an electoral review outlined in the report. However, when setting its work programme for the current year, it decided not to undertake a review of these authorities on the basis that there were other areas where the need for a review was a higher priority. It also agreed that it would not start electoral reviews of any London boroughs until the summer of 2011, having first considered the levels of electoral imbalance present under the December 2010 electoral register.

If you are not satisfied with this response, please note that the Commission operates a review procedure.

Please also note that if you have exhausted all internal Commission review procedures and you are still not satisfied you have the right to appeal to the Information Commissioner. Details of this procedure can be found on the ICO website: <http://www.ico.gov.uk>.

Yours sincerely

**Daniel Knag**  
**Implementation Officer**  
Local Government Boundary Commission for England  
Implementation Team  
Layden House  
76-86 Turnmill Street  
London EC1M 5LG  
Tel: 020 7664 8521  
Fax: 020 7296 6227  
[www.lgbce.org.uk](http://www.lgbce.org.uk)



Please consider the environment before printing this email.

## Appendix B: List of FER qualifiers

December 2009 register

Note 1: Criterion 1 is met when 30% of wards/divisions are over 10% from the average; criterion 2 is met when one ward/division is over 30% from the average

Note 2: Numbers 61-72 are based on 2008 data, as 2009 data was not available

	Type	Council	Cycle	Meets both criteria?	Criterion 1	%age of wards/divs over 10% from the average	Criterion 2	Outlier +ve	Outlier -ve	Qualify 2008?	Current/previous FER?	Improve/ Deteriorate since 2008?
1	DCs	Aylesbury Vale	Whole	y	y	31%	y	22	35	y	n	Det
2		Boston	Whole	n	y	39%	n	25	27	y	n	Det
3		Broxbourne	Thirds	n	y	31%	n	25	12	n	n	Det
4		Broxtowe	Whole	n	n	14%	y	24	34	y	n	Imp
5		Chichester	Whole	n	n	17%	y	113	55	y	n	Imp
6		Copeland	Whole	n	y	32%	n	22	25	y	n	Imp
7		Corby	Whole	y	y	47%	y	20	39	y	y	Det
8		Daventry	Thirds	n	n	21%	y	43	17	y	n	Imp
9		East Lindsey	Whole	n	n	29%	y	33	18	y	n	Imp
10		Hart	Thirds	n	n	22%	y	34	21	y	n	Det
11		Lancaster	Whole	n	n	11%	y	47	13	y	n	Imp
12		Lichfield	Whole	n	y	38%	n	26	13	n	n	Det
13		Mansfield	Whole	n	n	16%	y	32	18	n	y	Det
14		North Dorset	Whole	y	y	32%	y	43	21	y	n	Imp
15		North East Derbyshire	Whole	n	n	4%	y	36	8	y	n	Det
16		Northampton	Whole	y	y	39%	y	34	16	y	y	Det
17		Preston	Thirds	n	n	27%	y	12	34	y	n	Det
18		Purbeck	Thirds	n	y	36%	n	19	29	n	n	Det
19		Richmondshire	Whole	n	n	21%	y	32	14	n	n	Det
20		Rugby	Thirds	n	n	20%	y	51	29	y	n	Det
21		Rushmoor	Thirds	n	y	36%	n	18	13	n	n	Det
22		Sedgemoor	Whole	n	n	24%	y	57	16	y	y	Det
23		South Derbyshire	Whole	y	y	41%	y	41	16	y	y	Imp
24		South Kesteven	Whole	n	y	32%	n	27	16	n	n	Det
25		South Norfolk	Whole	n	y	31%	n	19	15	n	n	Det
26		St Edmundsbury	Whole	n	n	13%	y	37	12	n	n	Det
27		Suffolk Coastal	Whole	n	n	24%	y	40	22	y	n	Det
28		Swale	Thirds	n	n	28%	y	48	15	y	n	Imp
29		Taunton Deane	Whole	y	y	35%	y	24	38	y	y	Imp
30		Test Valley	Whole	n	n	25%	y	11	31	y	n	-
31		Tonbridge & Malling	Whole	y	y	38%	y	36	18	y	n	Det
32		Uttlesford	Whole	y	y	30%	y	43	29	y	n	Det
33		Waverley	Whole	n	n	17%	y	55	31	y	n	-
34		Wellingborough	Whole	n	y	38%	n	24	19	y	n	Det
35		West Lindsey	Thirds	y	y	44%	y	25	31	y	n	Det
36		West Somerset	Whole	y	y	61%	y	17	42	y	y	Det
37		Winchester	Thirds	n	n	19%	y	14	36	y	n	-

	Type	Council	Cycle	Meets both criteria?	Criterion 1	%age of wards/divs over 10% from the average	Criterion 2	Outlier +ve	Outlier -ve	Qualify 2008?	Current/previous FER?	Improve/ Deteriorate since 2008?
38	UAs	Bedford	Whole	y	y	69%	y	61	39	n	y	n/a
39		Central Bedfordshire	Whole	y	y	32%	y	31	32	n	y	n/a
40		Cornwall	Whole ©	n	n	29%	y	46	58	n	y	n/a
41		Darlington	Whole	n	n	8%	y	37	8	n	n	n/a
42		Durham	Whole ©	y	y	44%	y	36	22	n	y	n/a
43		Hartlepool	Thirds	n	y	41%	n	19	22	n	n	n/a
44		Herefordshire	Whole	y	y	30%	y	20	33	y	n	Det
45		Leicester	Whole	n	y	36%	n	28	20	y	n	Det
46		Middlesbrough	Whole	y	y	30%	y	14	36	n	n	n/a
47		North Somerset	Whole	n	n	28%	y	61	20	y	n	Det
48		Poole	Whole	n	y	31%	n	15	16	n	n	n/a
49		Redcar & Cleveland	Whole	n	y	32%	n	12	11	n	n	n/a
50		Slough	Thirds	n	y	36%	n	16	15	n	n	n/a
51		Southampton	Thirds	n	n	13%	y	32	11	n	n	n/a
52		Swindon	Thirds	y	y	36%	y	65	15	y	n	Det
53		Telford & Wrekin	Whole	n	n	24%	y	14	38	y	n	Imp
54		York	Whole	n	n	23%	y	23	32	n	n	n/a
55	LBs	Kensington & Chelsea	Whole (L)	n	y	39%	n	17	12		n	n/a
56		Westminster	Whole (L)	n	y	35%	n	13	14		n	n/a
57	CCs	Buckinghamshire	Whole ©	n	y	30%	n	21	20	y	n	Imp
58		Cambridgeshire	Whole ©	n	y	30%	n	23	20	y	n	Imp
59		Somerset	Whole ©	y	y	36%	y	40	25	y	n	-
60		Warwickshire	Whole ©	n	y	45%	n	19	23	y	n	Det
61		Cumbria	Whole ©	y	y	31%	y	33	27	y	n	n/a
62		Derbyshire	Whole ©	y	y	30%	y	34	22	y	n	n/a
63		Devon	Whole ©	y	y	32%	y	53	23	y	n	n/a
64		Hertfordshire	Whole ©	n	n	29%	y	48	20	y	n	n/a
65		Kent	Whole ©	y	y	31%	y	38	24	y	n	n/a
66		Lancashire	Whole ©	y	y	30%	y	32	25	y	n	n/a
67		Linconshire	Whole ©	y	y	48%	y	30	33	y	n	n/a
68		Northamptonshire	Whole ©	y	y	45%	y	41	23	y	n	n/a
69		Nottinghamshire	Whole ©	n	y	31%	n	25	25	y	n	n/a
70		Oxfordshire	Whole ©	n	n	19%	y	35	16	y	n	n/a
71		Staffordshire	Whole ©	n	y	41%	n	21	22	y	n	n/a
72		Surrey	Whole ©	n	y	31%	n	26	24	y	n	n/a

Last updated: 6 May 2010

Review	Cmsnr	Status	RO	Electoral cycle/ date of implementation	Prel period	C-size consult start	C-size consult end	C-size LGBCE mtg	Stage 1 starts	Stage 2 starts	LGBCE mtg	Stage 3 starts (draft recs published)	Stage 4 starts	LGBCE mtg	End of review (final recs published)
CORNWALL	Joan Jones & Colin Mellors	Directed 2008	Paul Kingsley	County whole/ 2013			18.07.08	14.08.08	09.09.08	14.08.08	29.10.08	02.12.08	11.02.09	10/07/09 30.09.09	08.12.09
NORTHUMBERLAND	Jane Earl & Colin Mellors	Directed 2008	Arion Lawrence	County whole/ 2013	07.06.08	15.07.08	15.09.08	02.02.09	17.02.09	11.05.09	15.06.09	25.08.09	16.11.09	13.01.10	09.03.10
DURHAM	Jane Earl & Colin Mellors	Directed 2008	Jessica Metheringham	County whole/ 2013	07.06.08	15.07.08	15.09.08	03.03.09	17.03.09	08.06.09	10.07.09	15.09.09	07.12.09	03.02.10 / 15.04.10 / 02.06.10	06.07.10
CHESHIRE EAST	Joan Jones and Peter Knight	Directed 2008	Richard Buck	District whole/ 2011	12.01.09	24.02.09	06.04.09	27.04.09	12.05.09	03.08.09	30.09.09	10.11.09	15.02.10	15.04.10 / 02.06.10	13.07.10
CHESHIRE WEST	Joan Jones & Peter Knight	Directed 2008	Jessica Metheringham	District whole/ 2011	12.01.09	24.02.09	06.04.09	27.04.09	12.05.09	03.08.09	30.09.09	10.11.09	01.02.10	18.03.10 / 02.06.10	13.07.10
SMWR MANSFIELD	Jane Earl	Directed Dec 08	Paul Kingsley	District whole/ 2011	22.06.09	04.08.09	14.09.09	30.09.09	20.10.09	12.01.10	18.02.10	26.03.10	14.06.10	23.07.10	17.09.10
STOKE-ON-TRENT	Max Caller & Peter Knight	Directed June 09	Tim Bowden	District whole/ 2011	22.06.09	04.08.09	14.09.09	30.09.09	20.10.09	12.01.10	18.02.10	26.03.10	14.06.10	19.08.10	12.10.10
CENTRAL BEDS	Colin Mellors	Directed Dec 08	Arion Lawrence	District whole/ 2011	22.06.09	04.08.09	14.09.09	30.09.09 & 20.10.09	27.10.09	12.01.10	18.03.10	17.05.10	12.07.10	19.08.10	12.10.10
BEDFORD	Colin Mellors	Directed Dec 08	Richard Buck	District whole/ 2011	22.06.09	04.08.09	14.09.09	30.09.09 & 20.10.09	27.10.09	12.01.10	18.03.10	17.05.10	12.07.10	19.08.10	12.10.10
NORTHAMPTON	Peter Knight	Directed March 2009	Arion Lawrence	District whole/ 2011	14.09.09	N/A	N/A	N/A	27.10.09	19.01.10	15.04.10	25.05.10	19.07.10	19.08.10	12.10.10
S DERBYSHIRE	Joan Jones	Directed March 2009	William Morrison	District whole/ 2011	14.09.09	N/A	N/A	N/A	27.10.09	19.01.10	15.04.10	25.05.10	19.07.10	19.08.10	12.10.10
W SOMERSET	Joan Jones	Directed March 2009	Paul Kingsley	District whole/ 2011	14.09.09	N/A	N/A	N/A	27.10.09	19.01.10	15.04.10	25.05.10	19.07.10	19.08.10	12.10.10
SEDGEMOOR	Peter Knight	Directed March 2009	Kalim Anwer	District whole/ 2011	14.09.09	N/A	N/A	N/A	27.10.09	19.01.10	15.04.10	25.05.10	19.07.10	19.08.10	12.10.10
WEST LINDSEY	Not assigned	Not Directed	Not assigned	3rds/ 2012	07.06.10	20.07.10	30.08.10	14.09.10	28.09.10	21.12.10	09.02.11	29.03.11	20.06.11	w/c 25.07.11	06.09.11
SWINDON	Not assigned	Not Directed	Not assigned	3rds/ 2012	07.06.10	20.07.10	30.08.10	14.09.10	28.09.10	21.12.10	09.02.11	29.03.11	20.06.11	w/c 25.07.11	06.09.11
DAVENTRY	Not assigned	Not Directed	Not assigned	3rds/ 2012	07.06.10	20.07.10	30.08.10	14.09.10	28.09.10	21.12.10	09.02.11	29.03.11	20.06.11	w/c 25.07.11	06.09.11
HARTLEPOOL	Not assigned	Not Directed	Not assigned	3rds/ 2012	07.06.10	20.07.10	30.08.10	14.09.10	28.09.10	21.12.10	09.02.11	29.03.11	20.06.11	w/c 25.07.11	06.09.11
SLOUGH	Not assigned	Not Directed	Not assigned	3rds/ 2012	07.06.10	20.07.10	30.08.10	14.09.10	28.09.10	21.12.10	09.02.11	29.03.11	20.06.11	w/c 25.07.11	06.09.11

Review	Cmsnr	Status	RO	Electoral cycle/ date of implementation	Prel period	C-size consult start	C-size consult end	C-size LGBCE mtg	Stage 1 starts	Stage 2 starts	LGBCE mtg	Stage 3 starts (draft recs published)	Stage 4 starts	LGBCE mtg	End of review (final recs published)
BROXBORNE	Not assigned	Not Directed	Not assigned	3rds/ 2012	03.08.10	14.09.10	25.10.10	09.11.10	30.11.10	22.02.11	w/c 11.04.11	31.05.11	23.08.11	w/c 04.08.11	01.11.11
PURBECK	Not assigned	Not Directed	Not assigned	3rds/ 2012	03.08.10	14.09.10	25.10.10	09.11.10	30.11.10	22.02.11	w/c 11.04.11	31.05.11	23.08.11	w/c 04.08.11	01.11.11
RUSHMOOR	Not assigned	Not Directed	Not assigned	3rds/ 2012	03.08.10	14.09.10	25.10.10	09.11.10	30.11.10	22.02.11	w/c 11.04.11	31.05.11	23.08.11	w/c 04.08.11	01.11.11
RUGBY	Not assigned	Not Directed	Not assigned	3rds/ 2012	03.08.10	14.09.10	25.10.10	09.11.10	30.11.10	22.02.11	w/c 11.04.11	31.05.11	23.08.11	w/c 04.08.11	01.11.11
SWALE	Not assigned	Not Directed	Not assigned	3rds/ 2012	03.08.10	14.09.10	25.10.10	09.11.10	30.11.10	22.02.11	w/c 11.04.11	31.05.11	23.08.11	w/c 04.08.11	01.11.11
GLOUCESTERSHIRE	Not assigned	Not Directed	Not assigned	County whole/ 2013	31.8.10	12.10.10	22.11.10	08.12.10	25.01.10	19.04.11	w/c 06.06.11	26.07.11	18.10.11	w/c 05.12.11	31.01.12
SOMERSET	Not assigned	Not Directed	Not assigned	County whole/ 2013	31.8.10	12.10.10	22.11.10	08.12.10	25.01.10	19.04.11	w/c 06.06.11	26.07.11	18.10.11	w/c 05.12.11	31.01.12
LEICESTERSHIRE	Not assigned	Not Directed	Not assigned	County whole/ 2013	31.8.10	12.10.10	22.11.10	08.12.10	25.01.10	19.04.11	w/c 06.06.11	26.07.11	18.10.11	w/c 05.12.11	31.01.12
STAFFORDSHIRE	Not assigned	Not Directed	Not assigned	County whole/ 2013	31.8.10	12.10.10	22.11.10	08.12.10	25.01.10	19.04.11	w/c 06.06.11	26.07.11	18.10.11	w/c 05.12.11	31.01.12
LINCOLNSHIRE	Not assigned	Not Directed	Not assigned	County whole/ 2013	31.8.10	12.10.10	22.11.10	08.12.10	25.01.10	19.04.11	w/c 06.06.11	26.07.11	18.10.11	w/c 05.12.11	31.01.12
NORTHAMPTONSHIRE	Not assigned	Not Directed	Not assigned	County whole/ 2013	31.8.10	12.10.10	22.11.10	08.12.10	25.01.10	19.04.11	w/c 06.06.11	26.07.11	18.10.11	w/c 05.12.11	31.01.12
PABR 1	Not assigned	Not Directed	Not assigned	N/A	10.01.11	N/A	N/A	N/A	07.03.11	31.05.11	w/c 18.07.11	06.09.11	29.11.11	w/c 16.01.12	06.03.12
PABR 2	Not assigned	Not Directed	Not assigned	N/A	10.01.11	N/A	N/A	N/A	07.03.11	31.05.11	w/c 18.07.11	06.09.11	29.11.11	w/c 16.01.12	06.03.12
PABR 3	Not assigned	Not Directed	Not assigned	N/A	10.01.11	N/A	N/A	N/A	07.03.11	31.05.11	w/c 18.07.11	06.09.11	29.11.11	w/c 16.01.12	06.03.12
PABR 4	Not assigned	Not Directed	Not assigned	N/A	10.01.11	N/A	N/A	N/A	07.03.11	31.05.11	w/c 18.07.11	06.09.11	29.11.11	w/c 16.01.12	06.03.12
PABR 5	Not assigned	Not Directed	Not assigned	N/A	10.01.11	N/A	N/A	N/A	07.03.11	31.05.11	w/c 18.07.11	06.09.11	29.11.11	w/c 16.01.12	06.03.12

Report to	Commission Meeting on 18 May 2010
Subject	Review programme 2010-11
From	Sam Hartley – Review Manager
Appendices	Appendix A: Proposed review timetable 2010-11 Appendix B: List of authorities meeting FER criteria
For decision	The Commission is invited to agree the recommendations

## Background

1. This paper seeks the Commission's agreement in principle to a programme of review activity over the next 12-18 months. The recommendations are based on consideration of:
  - the LGBCE's statutory responsibilities (in the case of the new unitary authorities of Exeter and Norwich)
  - an analysis of data (where it has been provided) on the levels of electoral imbalance present in authorities in England, and taking into account the type of authority and their electoral cycle;
  - requests or expressions of interest from authorities for electoral or administrative boundary reviews;
  - commitments given by the Commission to the Speaker's Committee and expressed in its Corporate Plan; and
  - recent changes to the process of electoral reviews and lessons learned from current and recently-completed reviews.
2. It should be noted that the Electoral Commission directed the Boundary Committee for England to conduct an electoral review of Gloucestershire County Council in December 2008. This follows a request from the county for a single-member division review. This direction remains valid for the LGBCE and the review has been timetabled.

## Exeter and Norwich unitary authorities

3. Under the Local Government, Economic Development and Construction Act 2009, the Commission is required to consider whether an electoral review is necessary for any newly-created unitary authorities. Orders establishing the new unitary authorities of Exeter and Norwich were made on 25 March 2010

4. Neither authority meets the criteria<sup>1</sup> for a further electoral review. Only two of Exeter's 18 wards (11%) vary by more than 10% from that average, at 12% and -12%, while all of Norwich's wards are within 10% of the average. Given the absence of electoral imbalances in either authority, the team recommends that the Commission does not conduct electoral reviews of the two new authorities. This will give the authorities the opportunity to establish themselves without the added complication of an electoral review (although it was, of course, Conservative Party policy to repeal the two Structural Change Orders).
5. The residual counties of Devon and Norfolk are covered later in this paper.

## FER investigations

6. The team has examined the 2009 electoral register data provided to the Commission by the Local Government Chronicle Elections Centre at Plymouth University ('Plymouth'), in order to identify those authorities that meet the criteria for a further electoral review. Data has been received for all two-tier-district, Metropolitan district, unitary (including county unitaries) and London borough councils, but for only a handful of two-tier counties. Plymouth advise that, for the most part, county electoral data is only collated for the county election year; the team has therefore also analysed the 2008 data for those counties for which the Commission did not receive 2009 data.
7. Of those authorities for which there is 2009 electorate data, 60 qualify for an FER on one or both criteria, compared with 59 based on the December 2008 electoral registers. On average, since 2005 eight principal authorities have met the FER threshold for the first time each year although, of course, there can be no guarantee that this number will remain constant; indeed, one would expect more authorities to start meeting the criteria the longer it has been since they were last reviewed. This excludes county data as this has, to date only been provided once every four years. It should be noted that, as the Plymouth data has only just been received and analysed, the team has not yet had the opportunity to approach the authorities about the levels of imbalance, and the likelihood of them improving over the next few years. Appendix A shows those authorities that currently meet one or both criteria.
8. Of the 60 authorities, 11 have either recently undergone, or are currently undergoing, an electoral review and have therefore not been considered for a further review. Thirty-one of the remaining authorities met the criteria in December 2008; imbalances in 15 of these have deteriorated since 2008. Of those 15 authorities, three elect by thirds and the remainder elect the whole council once every four years.

## The implications of electoral cycle

9. A significant factor in preparing a programme of work for the next 18 months has been the electoral cycle of those authorities that meet one or both criteria. The following table outlines the next two years of election for each type of local

---

<sup>1</sup> Criterion 1 is having 30% of wards/divisions varying from the average by more than 10%; criterion 2 is having one ward/division with a variance of more than 30% from the average.



authority:

Type of authority	Electoral cycle	Next two election years
<b>Two-tier district / unitary</b>	thirds	2011 and 2012
<b>Two-tier district / unitary</b>	whole	2011 and 2015
<b>Metropolitan</b>	thirds	2011 and 2012
<b>London Boroughs</b>	whole	2014 and 2018
<b>Unitary County</b>	whole	2013 and 2017
<b>Two-tier county</b>	whole	2013 and 2017
<b>GLA</b>	whole	2012 and 2016

10. Whole-council elections for two-tier and unitary districts occur next year (2011), and will again in four years time (2015). There would seem little point in beginning reviews of authorities on such a cycle this year, given that the expected implementation date will be only one year before the end of the five-year forecast from the making of the recommendations.
11. The team's recommendation is that reviews of two-tier district and unitary authorities that elect the whole council every four years do not start before late 2011, the first tranche of which will be completed towards the middle of 2013. This will allow implementation in 2015, with the five-year forecast from the end of the review running to 2018, providing more robust and longer-lasting recommendations.
12. Clearly, unless the LGBCE acquires the legislative power to implement new electoral arrangements out-of-cycle, which seems unlikely, there will continue to be a four-yearly cycle of scheduling, with reviews of authorities on the whole-council cycle beginning not before late-2011 (using this four-year cycle as an example) and not after mid-2013, to allow time for implementation in 2015. Given there are a large number of such authorities, this is likely to be an even more intensive period of work for the LGBCE2.
13. The team recommends that the Commission begin the first reviews of whole-council district and unitary authorities in late 2011; this also allows the Commission to consider the December 2010 electoral register to verify whether the variances are improving or deteriorating in those authorities. Leaving aside those reviews, this leaves:
  - authorities that elect by halves (none of which meet either of the FER criteria at present);
  - authorities that elect by thirds (only a small number meet the criteria, discussed below);
  - London boroughs (only two meet the criteria currently and the team would not propose beginning them until late 2011 for implementation in 2014); and

---

2 Interestingly, this point highlights an anomaly in the LGPIH Act 2007, whereby authorities resolving to move to whole-council elections can only do so in the year before whole-council elections – i.e. 2013, 2017 etc. Assuming some of these councils may want to move to single-member wards and accordingly request a review by the LGBCE, this would not allow the Commission the time to conduct a review and implement the new arrangements by the next election, resulting in a four-year delay in implementing a pattern of single-member wards/divisions, if that were the outcome of a review. This anomaly has been pointed out to the Department. However, the Department maintains that the provision was deliberately drafted that way

- county councils, which elect the whole council every four years, the next of which is in 2013.
14. Clearly, the same principle regarding scheduling will apply to county council electoral reviews, i.e. that there would be little point starting them in the year of county council elections – reviews of county councils should ideally not begin before summer 2010 and not after autumn 2011. As mentioned previously, the BCFE had been directed to conduct a review of Gloucestershire County Council and this has been scheduled into the LGBCE's work plan, to begin in October this year.
  15. Of the few county electoral registers received from Plymouth this year, four two-tier counties are shown to meet the FER criteria. One – Somerset – meets both criteria, with 36% of the divisions varying by more than 10% and one division varying by 40%. It should be noted that the LGBCE will this year complete FERs of two of the five districts in Somerset (West Somerset and Sedgemoor), and the BCFE completed an FER of a third (Taunton Deane) in 2006. This authority met both FER criteria, both this year and last; it would appear that the electoral projections provided at the time have not yet been realised, although the imbalances are improving year on year. Neither of the remaining two districts – Mendip and South Somerset – meet either criterion. South Somerset currently has 28% of wards varying from its average by more than 10%, though this has improved since last year. Nevertheless, subject to further discussion with Taunton Deane over the likely timescale for the reduction in its electoral imbalances, the argument for a review of Somerset County Council based on both electoral imbalance and coterminosity between wards and divisions seems quite strong.
  16. In addition to reviews of Gloucestershire and Somerset county councils, three further counties meet one of the FER criteria based on the 2009 register. The team proposes to discuss the imbalances with the authorities before making a recommendation to the Commission as to the necessity for a review. It should also be noted that Leicestershire County Council has recently enquired about moving to single-member divisions – the team will follow this up with the Council.
  17. As mentioned previously, where 2009 data has not been available, the team has analysed the 2008 data. This reveals a further 12 counties that meet the criteria – one of which is Devon County Council, in fact to a higher degree, once the divisions covering the current Exeter City Council are removed. Norfolk County Council does not meet the criteria with the Norwich divisions, but hits the first criterion by having 32% of its divisions over 10% from the average without Norwich City Council's divisions.
  18. The Commission is not statutorily obliged to consider whether to conduct a review of residual authority areas following the establishment of a new unitary authority covering part of any authority. However, having regard to: a) the LGBCE's approach to deciding the most appropriate number of councillors for any authority and the compatibility of that approach with the new council sizes for Devon and Norfolk county councils (i.e. existing size minus the members for the city); b) the electoral imbalances present in Devon; and c) the county council electoral cycle, of elections in 2013 and then 2017; the case for

beginning reviews of one or both authorities within the next 18 months could be argued. There is an equally a strong case (as with the new unitary authorities of Exeter and Norwich), based on the lessons learned from previous reviews of authorities that had been through a restructuring process, that it would be more appropriate to allow the affected counties time to adapt to their new strategic direction, without the significant drivers of the two county towns, before the Commission considers undertaking electoral reviews.

19. The team recommends that the Commission begins electoral reviews of two-tier and unitary districts on the whole-council cycle in late 2011, and any London boroughs that meet the criteria on the 2010 electoral data in the summer of next year. Appendix B identifies those that suffer from the most significant imbalances; as mentioned previously, these imbalances will be verified on receipt of the December 2010 electoral data. The team also recommends the Commission begins reviews of Gloucestershire and Somerset county councils in the autumn of 2010, and a number of further county councils (following discussions with them regarding imbalances) later in 2010 and early 2011. The latest the Commission would be able to commence a county council electoral review and have it implemented for the next elections in 2013 would be September 2011.
20. This leaves those authorities that elect by thirds that meet the criteria for a further electoral review – fourteen in total. Two of these – West Lindsey and Swindon – meet both FER criteria, and did so on the basis of the 2008 data. Officers from the BCFE had discussions with both authorities last year, and both authorities acknowledged the need for a review. A third – Daventry – meets only one criterion but has significant individual ward imbalances; again, the Council last year acknowledged the need for a review. The team therefore recommends beginning reviews of these authorities this summer, with a view to implementing the recommendations in 2012.
21. A further five – Hartlepool, Slough (both unitary authorities), Broxborne, Purbeck and Rushmoor meet the first criterion (30% of the wards varying by more than 10% from the average) and therefore would be more likely to merit a review than those meeting just the second criteria, where an imbalance might be kept to one or two discrete areas. The team therefore recommends that the Commission begin reviews of these authorities this summer/autumn, unless the authorities can provide compelling evidence showing that the imbalances will be addressed. The imbalances have deteriorated since 2008 in all five authorities.
22. The team will approach the remaining authorities that meet the criteria and elect by thirds to discuss the likelihood of the electoral imbalances deteriorating or otherwise, and consider the responses before recommending that reviews be undertaken.

## Boundary reviews

23. The Commission, in its Corporate Plan, made a commitment to ‘undertake a very limited number of boundary reviews, where a good case is made for them to be conducted as a matter of priority’. Thereafter, the Commission stated its

aim to develop and maintain an ongoing programme of boundary reviews, integrated with electoral review work. As Commissioners are aware, we have a number of boundary review requests on file, and a number of boundary anomalies identified. The Commission will give initial consideration in a workshop following this meeting to the issues relating to the conduct of boundary reviews and therefore the details of planning/process is not considered here. The team has, however, allowed for between five and eight boundary reviews to be begun in early 2011 onwards. Implementation of boundary review recommendations is a matter for the Secretary of State, and therefore the careful consideration given above to electoral cycle is less of an issue (the Secretary of State has the power to require out of turn elections). Ultimately, however, the Commission has no say in when any recommendations are implemented.

24. The Commission has requests for small-scale boundary changes for the Saltdean area in Lewes and Brighton & Hove and from Chorley Borough Council and therefore these reviews have been used for indicative purposes.

## Review timetable

25. The team has considered the timescales required to produce robust, accurate recommendations, and has taken into account the lessons learnt from current and recently-completed reviews. The current electoral reviews of Stoke and Mansfield are estimated to take fifteen months (including preliminary and council-size consultation stages), while the four FERs are being conducted in less than one calendar year, in order to achieve implementation at whole-council elections in 2011. This has led to stages two and four (the LGBCE's analysis and deliberation stages) being constrained, leading to delays in Commission papers being dispatched, and consultation stages beginning without paper copies of the consultation documents being readily available. Neither of these effects is acceptable in a professionally-run consultation process.
26. In addition, the team has been making iterative improvements to the auditing of recommendations, in light of a recent internal review of the process. This has improved the accuracy of the recommendations; however, in a number of cases revisions to electorate figures have been necessary *after* the Commission has considered the recommendations. It is the team's view that an audit trail of the figures, at the least, must be conducted before the Commission paper is dispatched. The timetable for the current reviews does not afford that time – the timetable for future reviews does. This will augment, rather than replace, the full audit of the recommendations report prior to publication.
27. These time pressures will only increase with review tranches of up to seven reviews, separated by only two or three months. In addition, the pressures put on both Review Managers and the Director of Reviews in supervising the production of the recommendations (a number of them being produced by new, inexperienced staff) will be more considerable. Without wishing to pre-empt the Commission's consideration of the review process at it the workshop following its June meeting, taken with the usual risks regarding staff absence and

turnover, it is clear to the team that shortening the current review process could only be achieved by shortening the consultation periods.

28. Historically, the BCfE and LGCE before it adhered to the Cabinet Office's guidelines for consultation (neither were bound by the guidelines; nor is the LGBCE) that consultation periods should last a minimum of 12 weeks. Since the BCfE began reviews of new unitary authorities, it took a more relaxed approach to the guidelines, bearing in mind the time pressures it was under in terms of implementing the recommendations. The reviews of the new unitary authorities of Wiltshire and Shropshire contained two consultation periods of eight weeks (followed by a subsequent, unscheduled, period of further clarification for certain areas). The BCfE was confident that this length of consultation was justified given the other constraints it was under. Recent reviews have had periods of consultation lasting between eight and 12 weeks depending on such factors, as well as other factors such as holiday periods within the year.
29. The Commission may wish to take a view as to what is an appropriate default length of consultation for standard further electoral reviews, in order to help streamline the process of any one review, and bear in mind new ways of consulting to make the consultations more effective, if shorter (such as those currently being trialed for the review of Stoke-on-Trent). The future timetable has used 12-week consultations as a default, resulting in a review lasting a total of around 16 months from the beginning of the preliminary stage to the publication of final recommendations.
30. Notwithstanding the team's concerns over the time and resource pressures in any one review, there is a strong case that the overall programme of reviews can, from hereon in (without competing workload of the structural reviews and BCfE transfer and with a full, stable, complement of staff), be planned more effectively and produce a more regular and efficient throughput of total reviews each year. The current timetable for reviews, at Appendix B, seeks to ensure this.
31. It must be noted that adherence to the review programme requires discipline among not only the team but the Commission as a whole. The Commission must always ensure that it makes evidenced-based recommendations and seeks further evidence when appropriate of course; for the reasons outlined earlier in this paper regarding electoral cycles and the implications on the implementation of recommendations, it must also ensure that it is ready to take decisive action when such evidence is not, or is not likely to be, available. This will ensure that the overall review programme is not adversely affected by issues in individual reviews.

## Conclusion

32. The team asks the Commission to agree to its recommendations, that is:
  - Not to conduct electoral reviews of the new unitary authorities of Exeter and Norwich;
  - Not to start reviews of two-tier district and unitary authorities that elect the whole council every four years before late 2011

- To begin electoral reviews of two-tier and unitary districts on the whole-council cycle in late 2011, and any London boroughs that meet the criteria on the 2010 electoral data in the summer of next year.
  - To begin reviews of Gloucestershire and, subject to discussion with Taunton Deane, Somerset county councils in the autumn of 2010, and a number of further county councils (following discussions with them regarding imbalances) later in 2010 and early 2011. If there were a need to defer a review of Somerset until the Taunton Deane imbalances had been resolved, either by a review or otherwise, another county review could be brought forward.
  - To begin reviews of West Lindsey, Swindon and Daventry this summer, with a view to implementing the recommendations in 2012.
  - To begin reviews of Hartlepool, Slough, Broxborne, Purbeck and Rushmoor this summer/autumn, unless the authorities can provide compelling evidence showing that the imbalances will be addressed. The imbalances have deteriorated since 2008 in all five authorities.
  - Agree in principle the timetabling and scheduling of reviews as outlined in Appendix B.
33. The Commission is also invited to take a view on the following:
- Whether to conduct an electoral review of the residual counties of Devon and Norfolk;
  - The default length of consultation periods for further electoral reviews.

**Sam Hartley**  
**Local Government Boundary Commission for England**  
**May 2010**



