Dear Mr Owen,

Electoral review of Warwickshire County Council

Please accept this submission on behalf of Rugby Borough Council to the consultation on draft recommendations.

At the Council meeting on 28 October 2014, it was agreed that a submission should be made to the review. The text within the attachment to this letter is based upon the report submitted to Council and includes an agreed amendment relating to Newbold on Avon.

Yours sincerely,

Adam Norburn
Executive Director
Rugby Borough Council
Town Hall
Evreux Way
Rugby
Warwickshire
CV21 2RR
The main changes contained within the draft recommendations affecting the Rugby Borough Council administrative area are:

- reduced county councillor representation from 11 to 10
- each county division to be represented by one councillor
- a subsequent redrafting of the county division boundaries

This report comments upon electoral administration, division boundaries and electoral representation that affect the administrative area of Rugby Borough Council.

1 OBSERVATIONS
The draft recommendations in respect of the Rugby Borough Council administrative area have been reviewed and the following observations can be made:

1.1 Changes to parish and district boundaries
1.1.1 Cawston Parish
On 1 October 2014, the Rugby Borough Council (Reorganisation of Community Governance) Order 2014 enacted changes to Cawston parish boundaries. Full details have been provided to Warwickshire County Council and the LGBCE.

The new Cawston parish boundaries should be reflected within the FER final recommendations as they affect the boundaries of the following county divisions – Admirals & Cawston, Earl Craven and Dunsmore & Leam Valley.

1.1.2 Polling Districts & Polling Places
On 23 September 2014, Rugby Borough Council approved the final recommendations of its 2014 Review of Polling Places & Polling Districts. Details of the review have been published and formally submitted to Warwickshire County Council and the LGBCE.

It is recommended that the polling district changes and additions are recognised within the FER final recommendations as they may have an effect should county division boundaries be altered during the finalisation process.

1.2 Electorate predictions
Some of the LGBCE 2020 electorate predictions for Rugby districts contain totals that are below the actual electorate figures for September 2014.

Discussions with Warwickshire Observatory have identified that data for the predictions was based upon events and housing development progress between 2007 and 2011. This produced depressed growth trends and a total of 62 district predictions made for 2020 show electorate levels lower than the actual values for September 2014.

Overall, the FER electorate forecast for Rugby by 2020 is 81,151.

Appendix A illustrates analysis conducted by Rugby Borough Council based upon the progress of planning applications and actual housing developments since 2011. It estimates an electorate of 86,813 by 2020.

1 The further electoral review (FER) of Warwickshire County Council.
The inclusion of projected as well as approved developments provides an optimistic picture of residential growth within the Rugby Borough Council administrative area. However, even allowing for this approach, it is unreasonable to expect reductions in electorate within 52% of parishes and districts as portrayed within the FER forecast.

An alternative approach is to apply growth related to the population predictions offered by the Office of National Statistics (ONS) which currently show expected overall population growth for Rugby between 2014 and 2020 to be 5.3%. Therefore, based upon the actual electorate figure of 77,878 as at September 2014, this would result in a 2020 total of 81,998.

1.3 Representation

1.3.1 Average electorate per councillor

In the FER draft recommendations, the figure predicted for 2020 is 7,780.

The current ONS data indicates population changes from 100,800 in 2012 to 111,999 by 2025. Using the ONS-related growth, Appendix B shows the average population growth across Warwickshire during 2014-2020 to be 3.52%. Looking further ahead to 2025, growth is predicted to be 6.52%, producing an electorate per councillor figure of 7,934.

Calculations made during our 2014 review of polling districts and polling places within Rugby Borough Council determined potential growth rates higher than the ONS predictions. The pace of planning applications and rate of house building has grown beyond that forecast during the last LGBCE review of Rugby borough in 2011/12. Using this data indicates electorate growth for 2014-2020 of 7.6% and for 2014-2025 of 15.2%.

Whichever predictive process is applied, growth within the Rugby Borough Council area of administration due to housing developments is substantially higher than other Warwickshire districts. This means that the county electorate per councillor average is proportionally lower than if it was calculated just for Rugby and has the effect of increasing the chance of some proposed divisions becoming unrepresentative.

1.3.2 Division representation

The LGBCE has stated that representation levels (the number of electorate per councillor) must be within + or – 10% of a county-wide average. Within the Rugby area, growth is expected to be mostly within five of the proposed Warwickshire divisions where they contain housing developments such as the Cawston Grange extension, Cawston Lane, the Rugby Gateway site, the old Warwickshire College site, Technology Way and the Hillmorton mast site.

A recalculation of expected electorate within the proposed Warwickshire divisions may be found within Appendix C. It shows 2020 predictions by the FER and by the application of ONS growth to the actual electorate totals from September 2014.

Factoring-in housing developments produces differences in growth rates within the proposed divisions compared to those stated by the FER draft recommendations. Such differences continue beyond 2020 and through to 2025.

Our projections show that councillor representation for two divisions may exceed 10% of the average in 2020, increasing to five divisions through to 2025.
1.4 Coterminocity

Coterminocity between the boundaries of county divisions, parishes and districts is highly desirable for a number of operational reasons, such as compliance with the legal limitations of an electoral review, consistent electoral representation, simplified service council delivery and effective election processes.

Concerns have been raised that the boundaries of county divisions currently split borough wards and the draft proposals would again do so. Although parish boundaries have been respected by the FER, not all urban district boundaries have been.

Five sections of proposed county divisions cut through urban districts for no apparent logical reason. We have determined that these deviations from district boundaries involve 0, 10, 16, 20 and 40 residential properties respectively. When electorate changes are reallocated between the affected divisions, they make little appreciable difference to the electorate per councillor figures:

- Admirals & Cawston: 2% (= no change)
- Bilton & Hillside: +0.4% (= no change)
- Caldecott: -1.2% (= new deviation total of +3%)
- Eastlands: -0.4% (= no change)

Complications for electoral administration were experienced with the current divisional structure during the 2013 WCC elections. The division boundary proposals exacerbate this issue and would add an unnecessary burden for 2017.

1.5 Newbold on Avon

Rugby Borough Council welcomes the enhanced Community Partnership work in Newbold since 2012 however it wishes to express its concern at draft proposals for County divisions with regard to Newbold on Avon that splits the community.

The council agrees with Newbold on Avon Community Partnership that

- the draft boundary review proposals would lead to significant difficulties for residents
- the draft proposals undermine future community cohesiveness
2. **CONCLUSIONS**

2.1 The benefits of coterminosity between parish/polling district boundaries and County divisions are well-founded and desirable for many reasons. Councillors expressed their strong preference for coterminosity of county boundaries with ward and parish boundaries wherever possible.

2.2 The five instances where proposed division boundaries do not follow polling district boundaries have been shown to make very limited differences to electorate totals within the divisions and would create unnecessary complications for electoral administration. The boundaries of all polling districts should therefore be respected.

2.3 Proposed County division boundaries affecting Newbold on Avon would lead to significant difficulties for residents and undermine future community cohesiveness. Rugby Borough Council urges the LGBCE to amend its proposals so that all Newbold on Avon residents are within one County division.

2.4 Changes to the boundaries of Cawston parish should be reflected in the realignment of proposed County division boundaries for Admirals & Cawston, Earl Craven and Dunsmore & Leam Valley.

2.5 Changes and additions to Rugby Borough Council polling districts should be recognised within the FER final recommendations so that they may inform any County division alterations made during the finalisation process.

2.6 The FER electorate predictions are based upon data gathered for the period 2007-2011 when the economy was in recession. As a consequence, figures calculated for 52% of the parishes and polling districts used to create County divisions are lower than current electorate totals. Events since 2011 have already shown faster electoral growth than envisaged and further growth can be anticipated via ongoing housing development approvals and proposals. It is requested that the FER growth forecasts are recalculated to include data up to September 2014.
# APPENDIX A

## Electorate comparison between RBC and WCC/LGBCE predictions

**24 October 2014**

<table>
<thead>
<tr>
<th></th>
<th>2014</th>
<th>2016</th>
<th>2019</th>
<th>2020</th>
<th>2023</th>
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<td>80,896</td>
<td>83,913</td>
<td>86,813</td>
<td>89,712</td>
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<td>with known</td>
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<tr>
<td>developments</td>
<td></td>
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<td>WCC / LGBCE electorate prediction</td>
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<td>ONS Population</td>
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<td>104,080</td>
<td>106,081</td>
<td>107,713</td>
<td>110,389</td>
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<tr>
<td>RBC actual electorate</td>
<td>77,878</td>
<td>79,280</td>
<td>80,786</td>
<td>81,998</td>
<td>84,048</td>
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<td>with ONS population</td>
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<td></td>
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<tr>
<td>growth rate</td>
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</tr>
</tbody>
</table>

*Values in italics are calculated averages to enable chart lines to display fully*

## Sources:

1. RBC Electoral Register September 2014
2. RBC Polling Districts & Places review 2014
4. WCC Electoral Review 2014 (9 Sept 2014)
5. ONS 2012 subnational population projections (issued May 2014)
6. 2012 electorate from Warwickshire Observatory
APPENDIX B

Warwickshire County Council electoral review - LGBCE draft recommendations

Population growth predictions

<table>
<thead>
<tr>
<th>Area</th>
<th>2014</th>
<th>2020</th>
<th>Growth %</th>
<th>2025</th>
<th>Growth %</th>
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<tr>
<td>North Warwickshire</td>
<td>62,475</td>
<td>63,737</td>
<td>2.02</td>
<td>64,954</td>
<td>3.97</td>
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<tr>
<td>Nuneaton &amp; Bedworth</td>
<td>126,984</td>
<td>131,423</td>
<td>3.50</td>
<td>135,155</td>
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<tr>
<td>Rugby</td>
<td>102,328</td>
<td>107,713</td>
<td>5.26</td>
<td>111,999</td>
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<td>Stratford</td>
<td>121,519</td>
<td>125,146</td>
<td>2.98</td>
<td>128,350</td>
<td>5.62</td>
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<tr>
<td>Warwick</td>
<td>139,404</td>
<td>144,753</td>
<td>3.84</td>
<td>149,349</td>
<td>7.13</td>
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</tbody>
</table>

Warwickshire average: 3.52% 6.52%

Source - Office of National Statistics 29 May 2014
2012-based Subnational Population Projections. Local Authorities in England, mid-2012 to mid-2037 - All ages
## APPENDIX C

### Comparision of electorate forecasts and representation within proposed WCC divisions

<table>
<thead>
<tr>
<th>Division name</th>
<th>Number of councillors</th>
<th>Actual electorate (Sept 2014)</th>
<th>Variance from average %</th>
<th>WCC FER predictions for 2020 electorate Average WCC electorate per cllr 7,780</th>
<th>Variance from average %</th>
<th>Rugby-based prediction for 2020 electorate Average WCC electorate per cllr 7,934*</th>
<th>Variance from average %</th>
<th>Rugby-based prediction for 2025 electorate Average WCC electorate per cllr 7,934*</th>
<th>Variance from average %</th>
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<tbody>
<tr>
<td>Admirals &amp; Cawston</td>
<td>1</td>
<td>8,070</td>
<td>8</td>
<td>7,926</td>
<td>2</td>
<td>8,532</td>
<td>10</td>
<td>9,127</td>
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<td>Benn &amp; New Bilton</td>
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<td>2</td>
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<td>Bilton &amp; Hillside</td>
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<td>7,897</td>
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<td>Brownsover &amp; Coton</td>
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<td>Caldecott</td>
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<td>8,131</td>
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<td>8,063</td>
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<td>8,108</td>
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<tr>
<td>Dunsmore &amp; Leam Valley</td>
<td>1</td>
<td>7,998</td>
<td>7</td>
<td>8,217</td>
<td>6</td>
<td>9,020</td>
<td>16</td>
<td>11,340</td>
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<td>Earl Craven</td>
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<td>7,974</td>
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<td>8,026</td>
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<td>8,613</td>
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<td>8,626</td>
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<td>Eastlands</td>
<td>1</td>
<td>7,861</td>
<td>6</td>
<td>8,095</td>
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<td>8,123</td>
<td>4</td>
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<tr>
<td>Fosse</td>
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<td>9</td>
<td>7,801</td>
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<td>8,508</td>
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<td>8,777</td>
<td>11</td>
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<tr>
<td>Hillmorton</td>
<td>1</td>
<td>6,686</td>
<td>-10</td>
<td>8,342</td>
<td>7</td>
<td>8,386</td>
<td>8</td>
<td>9,810</td>
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<tr>
<td><strong>Totals</strong></td>
<td><strong>77,878</strong></td>
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<td><strong>81,151</strong></td>
<td><strong>7,934</strong></td>
<td><strong>83,913</strong></td>
<td><strong>7,934</strong></td>
<td><strong>89,712</strong></td>
<td><strong>7,934</strong></td>
</tr>
</tbody>
</table>

RBC predictions for 2020 are based upon delayed implementation of expected housing growth anticipated for 2018

* County average calculated by applying ONS population growth rate 2014-2025 to 2014 WCC electorate per cllr