7th May 2018

The Review Officer (Windsor and Maidenhead),
Local Government Boundary Commission for England,
14th Floor Millbank Tower,
Millbank,
London,
SW1P 4QP.

Dear Sir/Madam,

**Proposed Boundary Changes for Windsor & Maidenhead.**
Please find noted below my comments on the proposed draft recommendations for Windsor and Maidenhead.

**Nota Bene** I would refer you to my submission dated my submission dated 4th December 2017 which contains much data and evidence which you have not addressed and, for the sake of brevity, I will not include here again, expect to reinforce a point.

**Summary of my suggestions and requests**
✓ The obvious and prudent decision conclusion would be to abandon this exercise immediately and revisit the exercise figures with much reduced levels of uncertainty are available,
✓ All wards in Windsor should fall within these boundaries
✓ Suggested boundaries are as attached
✓ Parish Council Boundaries should also be redrawn to reflect this clear identity e.g. Bray, Holyport, & Eton should not include areas within Windsor
✓ The creation of a Windsor Town Council should be facilitated
✓ All wards should be cast on socio economic grounds see attached maps
✓ Central Windsor should NOT be joined with the distinctly different town or Eton, famous for, inter alia, being the home of Eton College
✓ Central Windsor should NOT be joined with the distinctly different town or Eton, famous for, inter alia, being the home of Eton College
✓ Ward boundaries should reflect discrete communities, for example on socio-economic grounds. No dilution should be allowed e.g. joining Clewer with Dedworth or, Eton with Windsor Town Centre.
✓ Wards should contain fewer residents per Councillor, to as low as 2,000 for 2017, to enable a realistic casework load and, to ensure that the scope of individual committees is manageable – remember these committees will be further burdened by the complex web of JVs, Shared Servicing, outsourcing and, property development company risks being introduced.

✓ Dedworth could be split in two to further facilitate convenient local government in other words to allow individual members to represent a geographically more discrete, and so manageable area, populace and so be more recognized and identifiable by residents.

✓ This divide could be either A) North:South along the Dedworth Road or, B) East West along Smith’s Lane and Wolf Lane.

✓ The creation of a Windsor Town Council should be facilitated – see previous point on “Reflecting the interests and identities of local communities”

✓ To deal with the issues which would cause a requirement for more councilors per voter: This should include more councilors to deal with the workload made more difficult to comprehend and so manage due to the rapidly evolving nature of the organization, given RBWM’s aggressive change programme and, the complications of JV, Shared Services and Property Development Companies.

✓ To deal with the issues which would cause a requirement for more councilors per voter: To allow for wards with a greater demand on local concillors for casework. This might require more Councillors to adequately communities with a lower socio-economic background.

✓ This would result in significantly more than the 42 Councillors proposed as, at the very least, certain wards in Windsor and some in Maidenhead would have a resident/member ratio of less than 2604 based on flawed 2017 figures provided and less than 2827 based on the flawed data expectations for 2023.

About the submitter
I am currently a Councillor for Clewer North in Windsor and, live in the ward I represent. I have been a Councillor since May 2017 and, this is my second stint, the last being July 2014 to May 2015.

I have also been active in the Windsor Community since 2002 though, my wife has been active in the area since 1997.
Together we have built up a strong understanding of the various communities in Windsor and, what Windsorians consider to be key factors in their identity, what their strengths are and, indeed what they consider to be the issues that they suffer from most namely, underrepresentation and poor governance from a “member-led” authority.

**Key objective: to foster good governance**

I put it to you that the most important objective for any reorganisation of political boundaries is to develop strong, vibrant and fully engaged communities which should result in a high functioning democracy with;

- Good, well supported decisions of councillors
- High voter turnouts
- Safe streets
- Active communities, based on wards and also Parish/Town Councils
- Communities with a clear, common, cohesive identity i.e. the town

With this in mind, the number of Councillors required should therefore be the product of changes in boundaries i.e. ward areas and elected members should follow and serve people, and not the other way round.

To do it the other way around will place the population at the mercy of pan-town, political parties who are well resourced, organized groups driven by ideology and not the pragmatic needs of residents. In other words, you will create towns without hope, with increasing numbers of dis-engaged, underrepresented, disgruntled residents.

No town should be left bereft of identity, discombobulated by errantly cast boundaries, which serve badly the critical beneficiaries in politics and government, namely, the people.

Yet your proposals affect Windsorians particularly badly. This is unacceptable to Windsorians.

I understand that it is not an easy task but, I would ask you to set aside an objective to reduce the number of Councillors and consider as of foremost importance the desire to strengthen communities and Towns
and, facilitate better, people centred governance and, tone down the consequential reductions in numbers of Councillors

A complex and confusing organization to understand and manage
Also, I would like to draw your attention again to the coded language in the Local Government Associations Peer Review, which indicated that the Borough had gone through rapid and ambitious changes which needed to bed down before the rest of the change mooted was implemented.

To read the report and its conclusions, go to https://www3.rbwm.gov.uk/download/downloads/id/3445/lga_corporate_peers_review_-_oct_2017.pdf

The elephants in the room
There are two issues which will negate the value of any work done now and, any changes made to boundaries, and could require a further exercise in the near future at further expense;
1. RBWM’s Borough Local Plan (BLP) has received much opposition from residents because of its many and obvious failings. Given this and the Inspector’s retort to late responses submitted by the Borough to her questions, it is possible that the BLP will either fail or, be materially altered, with regard to the number and location within wards of homes.
2. If Heathrow is granted permission to build a third runway then, it is estimated that a further 70,000 houses plus related social infrastructure, as well as business and commercial operations, will have to be foisted upon the area around Heathrow. This would completely invalidate this exercise.

The obvious and prudent decision
✓ The obvious and prudent decision conclusion would be to abandon this exercise immediately and revisit the exercise figures with much reduced levels of uncertainty are available,

The benefit would be;
1. To ensure that residents have a reasonable number of representatives, even if that is at the expense of numerical equality
2. To allow the Council’s change programme to bed down and so grant existing Councillors time to begin to comprehend how best to scrutinise the strategic demands on the Council through it’s increasingly complex structures e.g. JV’s, property development, share services....

**Proposed criteria for boundary changes**

With this in mind, I suggest that the key issues should be to;

1. **Reflecting the interests and identities of local communities**: This can be split into the following categories
   a. Maintaining the integrity of towns
   b. Support the distinctly different communities in these towns
   c. Promoting localism & community involvement to strengthen and enhance communities, build cohesiveness and deepen identity

2. **Promoting effective and convenient local government**: Drawing boundaries which respect the interest and identity of local communities will result in improved local governance: i.e. Points 1a, 1b, & 1c will improve governance and convenience (for the people) organization.

3. **Delivering electoral equality for local voters**: This can be regarded as being a function of:
   a. The consequential number of Councillors should be the product of casting correct boundaries.
   b. Weighted by the effect of complicated, evolving organisations: We should consider the difficulties of understanding and scrutinising an increasingly complex organization structure with growing legal demands i.e. more councilors, more training, more resources to equip and empower management and councilors should be considered strongly
   c. Weighted by the Demand on local concilllors: You should also consider the need, or potential demand on local councilors, required to adequately serve individual communities i.e. lower socio-economic

**Development of argument & suggestions**

Reflecting the interests and identities of local communities:
Maintaining the integrity of towns
In the minds of residents, Windsor has clear boundaries being the
• North: River Thames,
• East: Home park
• South: Crown Estate/Windsor Great Park
• West: LEGOLAND, St. Leonards Hill, & Oakley Green Road (from A308 to Dedworth Road)

✓ All wards in Windsor should fall within these boundaries
✓ Suggested boundaries are as attached
✓ Parish Council Boundaries should also be redrawn to reflect this clear identity e.g. Bray, Holyport, & Eton should not include areas within Windsor
✓ The creation of a Windsor Town Council should be facilitated

Reflecting the interests and identities of local communities: Support the distinctly different communities in these towns

Within Windsor, there are between three and four different community areas which are visible through the socio-economic lens, as noted below; these boundaries are also synonymous with the parish boundaries of the Church of England. See my previous submission dated 4th December 2017 for more informations

✓ All wards should be cast on socio economic grounds see attached maps
✓ Central Windsor should NOT be joined with the distinctly different town or Eton, famous for, inter alia, being the home of Eton College
✓ Central Windsor should NOT be joined with the distinctly different town or Eton, famous for, inter alia, being the home of Eton College

Reflecting the interests and identities of local communities: Promoting localism & community involvement to strengthen and enhance communities, build cohesiveness and deepen identity.

In order to promote localism, in other words ordinary residents, motivate only by the needs of their fellow residents, including those with full time jobs, taking responsibility for their area, including that of
being a Councillor, you should ensure that the role of Councillor is manageable.

✓ Ward boundaries should reflect discrete communities, for example on socio-economic grounds. No dilution should be allowed e.g. joining Clewer with Dedworth or, Eton with Windsor Town Centre.
✓ Wards should contain fewer residents per Councillor, to as low as 2,000 for 2017, to enable a realistic casework load and, to ensure that the scope of individual committees is manageable – remember these committees will be further burdened by the complex web of JVs, Shared Servicing, outsourcing and, property development company risks being introduced.

Promoting effective and convenient local government:
Based on the above, the area covered by Dedworth will be very large with, the bulk of the population in Windsor.
✓ Dedworth could be split in two to further facilitate convenient local government in other words to allow individual members to represent a geographically more discrete, and so manageable area, populace and so be more recognized and identifiable by residents.
✓ This divide could be either A) North:South along the Dedworth Road or , B) East West along Smith’s Lane and Wolf Lane.
✓ The creation of a Windsor Town Council should be facilitated – see previous point on “Reflecting the interests and identities of local communities”

Delivering electoral equality for local voters:
Delivering electoral equality for local voters: The consequential number of Councillors could be obtained by applying multiples to the lowest common denominator, as adjusted by the weightings noted below, or some similar mathematical formula.

Delivering electoral equality for local voters: To deliver true electoral equality the resident to Councillor ratio should be adjusted or weighted
✓ To deal with the issues which would cause a requirement for more councilors per voter. This should include more councilors to deal with the workload made more difficult to comprehend and so manage due to the rapidly evolving nature of the organization, given RBWM’s aggressive change programme and, the
complications of JV, Shared Services and Property Development Companies.

- To allow for wards with a greater demand on local councillors for casework. This might require more Councillors to adequately communities with a lower socio-economic background.
- This would result in more than the 42 Councillors proposed as, at the very least, certain wards in Windsor and some in Maidenhead would have a resident/member ratio of less than 2604 based on flawed 2017 figures provided and less than 2827 based on the flawed data expectations for 2023.
- I would propose a further 1 -2 Councillors for Windsor

**Problems with the Boundary Commission’s proposal**

I. As previously noted, there could be substantial material variations in the housing numbers and the location of development due to the uncertainties of the BLP emerging unchanged from the Inspection process.

II. Even with the current BLP the figures postulated by RBWM for developments in Windsor, even within the timescales, do not match the figures noted in the Boundary Commissions data for Windsor. In fact, the figures quoted are significantly lower i.e. more development is probably within the time frame which increased the variances or, should permit a greater number of Councillors in the Clewers and Dedworth. I noted these discrepancies in my original submission dated 4th December 2017

III. From my engagement with the communities in Windsor, Windsorians find it unacceptable that any part of Windsor, as well as the following areas, be included in non-Windsor Wards
   a. The Boltons
   b. Combermere barracks
   c. LEGOLAND
   d. St. Leonard’s Hill
   e. Windsor Town FC’s grounds

IV. Windsorians find it unacceptable that its Town Centre be combined with Eton, two distinct towns separated by a River with only a “pedestrian only” bridge linking them.
V. The LGBCE proposals seem to completely ignore both of its two compatible, and of primary importance, criteria of “Reflecting the interests and identities of local communities” & “Promoting effective and convenient local government”. Instead it seems to focus on “Delivering electoral equality for local voters”. Why do you seem do this?

VI. The LGBCE’s engagement with residents, especially those over 60 and those under 30, has been poor both in terms of reaching out to residents, explaining things easily and, helping them to respond. Well advertised, adequately resourced, road shows (with multiple events in each town) should have been de rigueur. Localism has not been supported.

VII. I am concerned that you seem to misrepresent myself and the WWRA, and use this misunderstanding to disregard my community focused proposal, when you state “the boundary proposed by Councillor Da Costa and West Windsor Residents’ Association who argued that the separate Clewer and Dedworth communities could be split down Mill Lane, Parsonage Lane and Hatch Lane.” What I actually said in my submission dated 4th December 2017 was, “Clever-St. Leonards (2 members) Including all residents on, or emanating from Mill Lane, Parsonage Lane, Hatch Lane, St. Leonards Hill”. Do you expect to consider your failing here and respond appropriately?

VIII. Given the complexity of RBWM and its continued rapid rate of change and, its poor record with regard to scrutiny, as evidenced by the LGA Peer Review, I put it to you that if you reduce the number of Councillors significantly you will be putting the Council, residents, tax payers and indeed services to the vulnerable at unnecessarily greater levels of risk.

I trust you find this to be in order and, look forward to your responses and, hopefully, for the sake of Windsorsians and good governance a casting of the boundaries in a manner sympathetic to Windsor, a world famous town in the public eye with a clear identity, and for the sake of good governance and improved democracy.
Kind regards,

Cllr. Wisdom Da Costa
Independent Councillor for Clewer North, Windsor

Attachments
1. Diagram of Windsor
2. Diagram of distinct communities within Windsor
3. CoFE Parish Boundaries
4. ONS 2011 Census DataShine Map on Deprivation