

Final recommendations on the
future electoral arrangements
for Dartford in Kent

Report to the Secretary of State for the
Environment, Transport and the Regions

May 2001

LOCAL GOVERNMENT COMMISSION FOR ENGLAND

This report sets out the Commission's final recommendations on the electoral arrangements for the borough of Dartford in Kent.

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Report no: 213

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Local Government Commission for England

9 May 2001

Dear Secretary of State

On 9 May 2000 the Commission began a periodic electoral review of Dartford under the Local Government Act 1992. We published our draft recommendations in October 2000 and undertook an eight-week period of consultation.

We have now prepared our final recommendations in the light of the consultation. We have substantially confirmed our draft recommendations, although some modifications have been made (see paragraph 112-113) in the light of further evidence. This report sets out our final recommendations for changes to electoral arrangements in Dartford.

We recommend that Dartford Borough Council should be served by 44 councillors representing 17 wards, and that changes should be made to ward boundaries in order to improve electoral equality, having regard to the statutory criteria. We recommend that elections for the Council should continue to take place every four years.

The Local Government Act 2000 contains provisions relating to changes to local authority electoral arrangements. However, until such time as Orders are made implementing those arrangements we are obliged to conduct our work in accordance with current legislation, and to continue our current approach to periodic electoral reviews.

I would like to thank members and officers of the Borough Council and other local people who have contributed to the review. Their co-operation and assistance have been very much appreciated by Commissioners and staff.

Yours sincerely

PROFESSOR MALCOLM GRANT
Chairman

SUMMARY

The Commission began a review of Dartford on 9 May 2000. We published our draft recommendations for electoral arrangements on 17 October 2000, after which we undertook an eight-week period of consultation.

- **This report summarises the representations we received during consultation on our draft recommendations, and contains our final recommendations to the Secretary of State.**

We found that the existing electoral arrangements provide unequal representation of electors in Dartford:

- **in 13 of the 23 wards the number of electors represented by each councillor varies by more than 10 per cent from the average for the borough and five wards vary by more than 20 per cent from the average;**
- **by 2005 electoral equality is not expected to improve, with the number of electors per councillor forecast to vary by more than 10 per cent from the average in 13 wards and by more than 20 per cent in seven wards.**

Our main final recommendations for future electoral arrangements (Figures 1 and 2 and paragraphs 112-113) are that:

- **Dartford Borough Council should have 44 councillors, three fewer than at present;**
- **there should be 17 wards, instead of 23 as at present;**
- **the boundaries of 22 of the existing wards should be modified and one ward should retain its existing boundaries;**
- **elections should continue to take place every four years.**

These recommendations seek to ensure that the number of electors represented by each borough councillor is as nearly as possible the same, having regard to local circumstances.

- **In 12 of the proposed 17 wards the number of electors per councillor would vary by no more than 10 per cent from the borough average.**
- **This improved level of electoral equality is forecast to continue, with the number of electors per councillor in no wards expected to vary by more than 10 per cent from the average for the borough in 2005.**

Recommendations are also made for changes to parish and town council electoral arrangements which provide for:

- **revised warding arrangements and the redistribution of councillors for the parishes of Darenth, Stone, Swanscombe & Greenhithe and Wilmington;**
- **an increase in the number of councillors on Swanscombe & Greenhithe Parish Council.**

All further correspondence on these recommendations and the matters discussed in this report should be addressed to the Secretary of State for the Environment, Transport and the Regions, who will not make an Order implementing the Commission's recommendations before 19 June 2001:

**The Secretary of State
Department of the Environment, Transport and the Regions
Local Government Sponsorship Division
Eland House
Bressenden Place
London SW1E 5DU**

Figure 1: The Commission's Final Recommendations: Summary

Ward name	Number of councillors	Constituent areas
1 Bean & Darenth	3	Bean ward (Bean parish); Darenth ward (part – the proposed Darenth Park, Ladywood, Lane End and Green Street Green parish wards of Darenth parish)
2 Brent	3	Brent ward; Darenth ward (part – the proposed Fleet Downs parish ward of Darenth parish)
3 Castle	1	Castle ward (part – the proposed Castle parish ward of Stone parish)
4 Greenhithe	3	Greenhithe and Swanscombe wards (part – the proposed parish wards of Greenhithe and Knockhall of Swanscombe & Greenhithe parish)
5 Heath	3	Heath ward; Miskin ward (part); Princes ward (part)
6 Joyce Green	2	Joyce Green ward (part)
7 Joydens Wood	3	Maypole ward; Wilmington West ward (part – the proposed Birchwood parish ward of Wilmington parish)
8 Littlebrook	2	Joyce Green ward (part); Littlebrook ward (part); Stone ward (part)
9 Longfield, New Barn & Southfleet	3	Longfield ward (Longfield & New Barn parish); Southfleet ward (Southfleet parish)
10 Newtown	3	Newtown ward; Stone ward (part – the proposed Milestone parish ward of Stone parish)
11 Princes	3	Princes ward (part); Wilmington East ward (part – the proposed Orange Tree parish ward of Wilmington parish)
12 Stone	3	Horns Cross ward (Horns Cross parish ward of Stone parish); Littlebrook ward (part); Stone ward (part – the proposed St Johns, Stone Village parish wards of Stone parish)
13 Sutton-at-Hone & Hawley	2	<i>Unchanged:</i> Sutton-at-Hone & Hawley ward (Sutton-at-Hone & Hawley parish)
14 Swanscombe	3	Galley Hill and Swanscombe wards (part – the proposed Galley Hill and Swanscombe parish wards of Swanscombe & Greenhithe parish)
15 Town	2	Gundulf ward (part); Miskin ward (part); Priory ward
16 West Hill	3	Gundulf ward (part); Miskin ward (part)
17 Wilmington	2	Wilmington Central, Wilmington East and Wilmington West wards (part – the proposed Central parish ward of Wilmington parish)

Notes: 1 Dartford borough comprises the eight parishes indicated above. The town of Dartford is unparished.

2 Map 2 and the large map in the back of the report illustrate the proposed wards outlined above.

Figure 2: The Commission's Final Recommendations for Dartford

	Ward name	Number of councillors	Electorate (2000)	Number of electors per councillor	Variance from average (%)	Electorate (2005)	Number of electors per councillor	Variance from average (%)
1	Bean & Darent	3	3,891	1,297	-12	4,290	1,430	-7
2	Brent	3	4,886	1,629	10	4,770	1,590	3
3	Castle	1	979	979	-34	1,520	1,520	-1
4	Greenhithe	3	3,109	1,036	-30	4,600	1,533	0
5	Heath	3	4,844	1,615	9	4,540	1,513	-2
6	Joyce Green	2	2,718	1,359	-8	3,110	1,555	1
7	Joydens Wood	3	4,506	1,502	1	4,954	1,651	7
8	Littlebrook	2	3,138	1,569	6	2,970	1,485	-3
9	Longfield, New Barn & Southfleet	3	5,085	1,695	14	4,930	1,643	7
10	Newtown	3	5,035	1,678	13	4,890	1,630	6
11	Princes	3	4,703	1,568	6	4,860	1,620	5
12	Stone	3	4,546	1,515	2	4,480	1,493	-3
13	Sutton-at-Hone & Hawley	2	3,241	1,621	9	3,070	1,535	0
14	Swanscombe	3	4,514	1,505	2	4,540	1,513	-2
15	Town	2	2,807	1,404	-5	2,870	1,435	-7
16	West Hill	3	4,084	1,361	-8	4,330	1,443	-6
17	Wilmington	2	3,082	1,541	4	2,956	1,478	-4
	Totals	44	65,168	-	-	67,680	-	-
	Averages	-	-	1,481	-	-	1,538	-

Source: Electorate figures are based on information provided by Dartford Borough Council.

Note: The 'variance from average' column shows by how far, in percentage terms, the number of electors per councillor varies from the average for the borough. The minus symbol (-) denotes a lower than average number of electors. Figures have been rounded to the nearest whole number.

1 INTRODUCTION

1 This report contains our final recommendations on the electoral arrangements for the borough of Dartford in Kent. We have now reviewed the 12 two-tier districts in Kent as part of our programme of periodic electoral reviews (PERs) of all 386 principal local authority areas in England. Our programme started in 1996 and is currently expected to be completed by 2004.

2 This was our first review of the electoral arrangements of Dartford. The last such review was undertaken by our predecessor, the Local Government Boundary Commission (LGBC), which reported to the Secretary of State in July 1975 (Report No. 18). The electoral arrangements of Kent County Council were last reviewed in November 1980 (Report No. 402). We completed a directed electoral review of Medway in 1996. We commenced a periodic electoral review of Medway in November 2000, and we expect to commence a PER of Kent County Council's electoral arrangements in 2002.

3 In undertaking these reviews, we have had regard to:

- the statutory criteria contained in section 13(5) of the Local Government Act 1992, ie the need to:
 - (a) reflect the identities and interests of local communities; and
 - (b) secure effective and convenient local government;
- the *Rules to be Observed in Considering Electoral Arrangements* contained in Schedule 11 to the Local Government Act 1972.

4 We are required to make recommendations to the Secretary of State on the number of councillors who should serve on the Borough Council, and the number, boundaries and names of wards. We can also make recommendations on the electoral arrangements for parish and town councils in the district.

5 We have also had regard to our *Guidance and Procedural Advice for Local Authorities and Other Interested Parties* (fourth edition published in December 2000), which sets out our approach to the reviews.

6 In our *Guidance*, we state that we wish wherever possible to build on schemes which have been prepared locally on the basis of careful and effective consultation. Local interests are normally in a better position to judge what council size and ward configuration are most likely to secure effective and convenient local government in their areas, while allowing proper reflection of the identities and interests of local communities.

7 The broad objective of PERs is to achieve, so far as practicable, equality of representation across the district as a whole. Having regard to the statutory criteria, our aim is to achieve as low a level of electoral imbalance as is practicable. We will require particular justification for schemes which would result in, or retain, an electoral imbalance of over 10 per cent in any ward. Any imbalances of 20 per cent or more should only arise in the most exceptional circumstances, and will require the strongest justification.

8 We are not prescriptive on council size. We start from the general assumption that the existing council size already secures effective and convenient local government in that district but we are willing to look carefully at arguments why this might not be so. However, we have found it necessary to safeguard against upward drift in the number of councillors, and we believe that any proposal for an increase in council size will need to be fully justified: in particular, we do not accept that an increase in a district's electorate should automatically result in an increase in the number of councillors, nor that changes should be made to the size of a district council simply to make it more consistent with the size of other districts.

9 In July 1998, the Government published a White Paper, *Modern Local Government – In Touch with the People*, which set out legislative proposals for local authority electoral arrangements. In two-tier areas, it proposed introducing a pattern in which both the district and county councils would hold elections every two years, i.e. in year one, half of the district council would be elected, in year two, half the county council would be elected, and so on. The Government stated that local accountability would be maximised where every elector has an opportunity to vote every year, thereby pointing to a pattern of two-member wards (and divisions) in two-tier areas. However, it stated that there was no intention to move towards very large electoral areas in sparsely populated rural areas, and that single-member wards (and electoral divisions) would continue in many authorities. The proposals have been taken forward in the Local Government Act 2000 which, among other matters, provides that the Secretary of State may make Orders to change authorities' electoral cycles. However, until such time as the Secretary of State makes any Orders under the 2000 Act, we will continue to operate on the basis of existing legislation, which provides for elections by thirds or whole-council elections in the two-tier district areas, and our current *Guidance*.

10 This review was in four stages. Stage One began on 9 May 2000, when we wrote to Dartford Borough Council inviting proposals for future electoral arrangements. We also notified Kent County Council, Kent Police Authority, Kent Association of Parish Councils, parish and town councils in the borough, the Members of Parliament with constituency interests in the district, the Members of the European Parliament for the South East region, and the headquarters of the main political parties. We placed a notice in the local press, issued a press release and invited the Borough Council to publicise the review further. The closing date for receipt of representations, the end of Stage One, was 31 July 2000. At Stage Two we considered all the representations received during Stage One and prepared our draft recommendations.

11 Stage Three began on 17 October 2000 with the publication of our report, *Draft recommendations on the future electoral arrangements for Dartford in Kent*, and ended on 11 December 2000. Comments were sought on our preliminary conclusions. Finally, during Stage Four we reconsidered our draft recommendations in the light of the Stage Three consultation and now publish our final recommendations.

2 CURRENT ELECTORAL ARRANGEMENTS

12 The borough of Dartford is situated in the north-west of Kent and covers some 7,287 hectares. The area has experienced significant recent development which will continue over the next 10 years. This includes residential development as a result of the borough's strong road connections with London, the English Channel and areas to the north via the M25, the M2 and the Dartford Crossing. A passenger station for the Channel Tunnel rail link is currently under construction. Europe's biggest out-of-town shopping centre, Bluewater, is situated at the centre of the borough. However, the south of the borough retains its rural character. The borough contains eight parishes, but Dartford town itself is unparished.

13 To compare levels of electoral inequality between wards, we calculated the extent to which the number of electors per councillor in each ward (the councillor:elector ratio) varies from the borough average in percentage terms. In the text which follows, this calculation may also be described using the shorthand term 'electoral variance'.

14 The electorate of the borough is 65,168 (February 2000). The Council presently has 47 members who are elected from 23 wards. Seven of the wards are each represented by three councillors, 10 are each represented by two councillors and six are single-member wards. The whole Council is elected every four years.

15 Since the last electoral review there has been an increase in the electorate of Dartford Borough, with around 13 per cent more electors than two decades ago as a result of new housing developments. The most notable increases have been in Priory, Stone and Wilmington Central wards.

16 At present, each councillor represents an average of 1,387 electors, which the Borough Council forecasts will increase to 1,440 by the year 2005 if the present number of councillors is maintained. However, due to demographic and other changes over the past two decades, the number of electors per councillor in 13 of the 23 wards varies by more than 10 per cent from the borough average, in five wards by more than 20 per cent and in one ward by more than 30 per cent. The worst imbalance is in Wilmington Central ward where the councillor represents 33 per cent more electors than the borough average.

Map 1: Existing Wards in Dartford

Figure 3: Existing Electoral Arrangements

	Ward name	Number of councillors	Electorate (2000)	Number of electors per councillor	Variance from average (%)	Electorate (2005)	Number of electors per councillor	Variance from average (%)
1	Bean	1	1,304	1,304	-6	1,250	1,250	-13
2	Brent	3	4,274	1,425	3	4,170	1,390	-3
3	Darenth	2	3,199	1,600	15	3,640	1,820	26
4	Galley Hill	2	2,351	1,176	-15	2,500	1,250	-13
5	Greenhithe	2	3,109	1,555	12	4,600	2,300	60
6	Gundulf	3	3,329	1,110	-20	3,760	1,253	-13
7	Heath	3	4,208	1,403	1	4,000	1,333	-7
8	Horns Cross	1	1,371	1,371	-1	1,310	1,310	-9
9	Joyce Green	2	2,756	1,378	-1	3,150	1,575	9
10	Littlebrook	2	3,100	1,550	12	2,930	1,465	2
11	Longfield	3	4,003	1,334	-4	3,870	1,290	-10
12	Maypole	2	2,689	1,345	-3	3,230	1,615	12
13	Miskin	2	2,336	1,168	-16	2,230	1,115	-23
14	Newtown	3	4,070	1,357	-2	3,920	1,307	-9
15	Princes	3	4,196	1,399	1	4,170	1,390	-3
16	Priory	1	1,681	1,681	21	1,610	1,610	12
17	Southfleet	1	1,082	1,082	-22	1,060	1,060	-26
18	Stone	3	5,119	1,706	23	5,660	1,887	31
19	Sutton-at-Hone & Hawley	2	3,241	1,621	17	3,070	1,535	7
20	Swanscombe	2	2,163	1,082	-22	2,040	1,020	-29
21	Wilmington Central	1	1,849	1,849	33	1,780	1,780	24
22	Wilmington East	1	1,314	1,314	-5	1,430	1,430	-1

Ward name	Number of councillors	Electorate (2000)	Number of electors per councillor	Variance from average (%)	Electorate (2005)	Number of electors per councillor	Variance from average (%)
23 Wilmington West	2	2,424	1,212	-13	2,300	1,150	-20
Totals	47	65,168	–	–	67,680	–	–
Averages	–	–	1,387	–	–	1,440	–

Source: Electorate figures are based on information provided by Dartford Borough Council.

Note: The 'variance from average' column shows by how far, in percentage terms, the number of electors per councillor varies from the average for the borough. The minus symbol (-) denotes a lower than average number of electors. For example, in 2000, electors in Southfleet ward were relatively over-represented by 22 per cent, while electors in Wilmington Central ward were relatively under-represented by 33 per cent. Figures have been rounded to the nearest whole number.

3 DRAFT RECOMMENDATIONS

17 During Stage One we received 52 representations, including borough-wide schemes from the officers of the Borough Council, Dartford Borough Council Conservative Group and Dartford Borough Labour Group, and representations from three parish and town councils, a residents' association, two local councillors and 42 local residents. In the light of these representations and evidence available to us, we reached preliminary conclusions which were set out in our report, *Draft recommendations on the future electoral arrangements for Dartford in Kent*.

18 Our draft recommendations were based on the officers' proposals, which achieved some improvement in electoral equality, and provided a mix of single-, two- and three-member wards across the borough. However, we moved away from the Borough Council's scheme in a number of areas, affecting 10 wards, using options based on representations made at Stage One together with some of our own proposals. We proposed that:

- the Borough Council should be served by 44 councillors, compared with the current 47, representing 17 wards, six fewer than at present;
- the boundaries of 21 of the existing wards should be modified, while two wards should retain their existing boundaries;
- there should be new warding arrangements for the parishes of Darenth, Stone and Wilmington.

Draft Recommendation

Dartford Borough Council should comprise 44 councillors, serving 17 wards. The whole Council should continue to be elected every four years.

19 Our proposals would have resulted in significant improvements in electoral equality, with the number of electors per councillor in 12 of the 17 wards varying by no more than 10 per cent from the borough average. This level of electoral equality was forecast to improve further, with no ward varying by more than 7 per cent from the average in 2005.

4 RESPONSES TO CONSULTATION

20 During the consultation on our draft recommendations report, 45 representations were received. A list of all respondents is available on request from the Commission. All representations may be inspected at the offices of Dartford Borough Council and the Commission.

Dartford Borough Council

21 The Borough Council put forward three minor amendments to our draft recommendations in relation to the boundaries of the proposed Wilmington ward, the name of the proposed East parish ward of Stone parish, and the distribution of councillors on Darenth Parish Council. Its proposals would have a minimal effect on electoral variances. It also objected to our proposal to combine part of Wilmington parish with Princes ward.

Dartford Borough Council Officers

22 The Borough Council officers proposed two minor changes to the proposed boundaries of Littlebrook and Wilmington wards which would not affect any electors.

Dartford Borough Council Conservative Group

23 The Conservative Group supported the Borough Council's proposed amendments to the boundary of Wilmington ward and the parish arrangements of Darenth and Stone wards. It also supported the officers' proposed amendments to the boundaries of Littlebrook and Wilmington wards.

24 In addition, it proposed changes to the boundaries of Greenhithe, Newtown, Stone, Town and West Hill wards, and supported retaining the existing warding arrangements for Longfield & New Barn and Southfleet. It also proposed changes to the parish electoral arrangements for Darenth, Stone, Swanscombe & Greenhithe and Wilmington.

Dartford Borough Council Labour Group

25 The Labour Group generally supported our draft recommendations, but opposed our proposals for Wilmington, particularly regarding the central and eastern parts of the parish. However, it did not put forward alternative proposals.

Parish Councils

26 We received five representations from parish councils. Bean Parish Council opposed our proposal to combine the existing Bean ward with part of Darenth. Longfield & New Barn and Southfleet parish councils objected to our proposal to combine the existing Longfield and Southfleet wards and supported retaining the existing wards. Sutton-at-Hone & Hawley Parish

Council supported our draft recommendation to retain the existing Sutton-at-Hone & Hawley ward. Swanscombe & Greenhithe Town Council reiterated its Stage One proposals for the parish to be represented by eight borough councillors serving four wards. Wilmington Parish Council objected to our proposals for Wilmington parish, but did not put forward alternative proposals.

Other Representations

27 We received a further 35 representations in response to our draft recommendations from a Member of Parliament, local organisations, councillors and residents.

28 Dr Howard Stoate MP supported retaining the existing warding arrangements for Southfleet. The Horns Cross & Stone Village Residents' Association objected to proposals for the proposed East parish ward of Stone parish to be renamed as St Mary's and suggested that the ward be renamed Stone Village. New Barn Residents' Association objected to our draft recommendation to combine the existing wards of Longfield and Southfleet and supported retaining the existing wards. The Powdermill Lane Resident's Association objected to our proposals for Wilmington and argued that the existing arrangements should be retained, with a minor boundary amendment between Wilmington Central and Wilmington West wards. Southfleet Parish Residents' Association supported our proposal not to divide the existing Southfleet ward; however, it objected to the parish being combined with Longfield & New Barn. Swanscombe & Greenhithe Residents' Association reiterated its Stage One proposals to increase the number of borough councillors representing Swanscombe and Greenhithe. The Wilmington Society objected to our proposal to combine part of Wilmington with Princes ward, but did not put forward alternative boundary proposals.

29 We received a representation from a local councillor objecting to our proposal to combine the existing Bean and Darenth wards and supporting combining Bean with Betsham village. Another local councillor accepted our proposals for Castle ward but objected to our proposal to combine the remainder of the existing Horns Cross and Stone wards. He proposed reducing the number of parish councillors representing St Johns parish ward of Stone parish and proposed that East parish ward be renamed Stone Village. Three councillors objected to our proposal to combine the existing Longfield and Southfleet wards and proposed retaining the existing wards. Two local councillors opposed our proposal to combine part of Wilmington parish with Princes ward and suggested a possible alternative, although they did not put forward specific boundary proposals.

30 We received 20 representations from local residents opposed to our proposal to combine the existing Longfield and Southfleet wards and in support of retaining the existing warding arrangements for this area.

5 ANALYSIS AND FINAL RECOMMENDATIONS

31 As described earlier, our prime objective in considering the most appropriate electoral arrangements for Dartford is, so far as reasonably practicable and consistent with the statutory criteria, to achieve electoral equality. In doing so we have regard to section 13(5) of the Local Government Act 1992 – the need to secure effective and convenient local government, and reflect the identities and interests of local communities – and Schedule 11 to the Local Government Act 1972, which refers to the number of electors per councillor being “as nearly as may be, the same in every ward of the district or borough”.

32 In relation to Schedule 11, our recommendations are not intended to be based solely on existing electorate figures, but also on assumptions as to changes in the number and distribution of local government electors likely to take place within the ensuing five years. We also must have regard to the desirability of fixing identifiable boundaries and to maintaining local ties which might otherwise be broken.

33 It is therefore impractical to design an electoral scheme which provides for exactly the same number of electors per councillor in every ward of an authority. There must be a degree of flexibility. However, our approach, in the context of the statutory criteria, is that such flexibility must be kept to a minimum.

34 Our *Guidance* states that we accept that the achievement of absolute electoral equality for the authority as a whole is likely to be unattainable. However, we consider that, if electoral imbalances are to be kept to the minimum, such an objective should be the starting point in any review. We therefore strongly recommend that, in formulating electoral schemes, local authorities and other interested parties should start from the standpoint of absolute electoral equality and only then make adjustments to reflect relevant factors, such as community identity and interests. Regard must also be had to five-year forecasts of change in electorates.

Electorate Forecasts

35 At Stage One the Borough Council submitted electorate forecasts for the year 2005, projecting an increase in the electorate of some 4 per cent from 65,168 to 67,680 over the five-year period from 2000 to 2005. It expected most of the growth to be in Greenhithe ward, although a significant amount was expected in Darenth, Joyce Green and Stone wards. The Council estimated rates and locations of housing development with regard to structure and local plans, the expected rate of building over the five-year period and assumed occupancy rates.

36 At Stage One, the Conservative Group supported the Council’s projections. Swanscombe & Greenhithe Town Council and Swanscombe & Greenhithe Residents’ Association considered that our recommendations should take account of development due to take place after 2005. However, while we appreciate concerns regarding future increases in the electorate, we are required by Schedule 11 of the 1972 Local Government Act to have regard to the number and distribution of electors at present and in five years’ time only. We are therefore unable to consider projected electorate growth beyond 2005. Having given consideration to the forecast electorates, we were satisfied that they represented the best estimates that could reasonably be made at the time.

37 At Stage Three, the Conservative Group supported the Borough Council's electoral projections. Swanscombe & Greenhithe Town Council reiterated their concerns that development after 2005 should be taken into account, which we have addressed above. Southfleet Parish Council and a local councillor raised concerns that electorate projections for the existing Southfleet ward do not take account of likely changes in population, the occupation of currently empty properties, nor of residential developments that might take place before 2005. Swanscombe & Greenhithe Residents' Association doubted the accuracy of the Borough Council's projected electorates for Swanscombe and Greenhithe. It asserted that there would be greater population increases in the area than the Borough Council predicted. A local councillor raised concerns regarding the projected decrease in the electorate of Bean, asserting that it is a popular place to live. We received 10 representations from local residents questioning the Borough Council's projection that the electorate of Southfleet would decrease by 2005. They argued that changes in the make-up of the local population, including younger residents achieving voting age, and likely housing development in the area would result in an increase in the electorate.

38 The Borough Council has responded to the concerns regarding its electoral projections by explaining precisely how the projected data was calculated. This included taking into account the likely occupancy of planned developments, local household-size decline trends and the estimated share of the population attaining voting age. We have carefully considered these calculations and we are persuaded that the Borough Council has calculated its electorate projections as accurately as possible given the information available. We accept that forecasting electorates is an inexact science and, having given consideration to the Borough Council's figures and supportive argumentation, we are content that they represent the best estimates that can reasonably be made at this time.

Council Size

39 As already explained, the Commission's starting point is to assume that the current council size facilitates effective and convenient local government, although we are willing to look carefully at arguments why this might not be the case. Dartford Borough Council presently has 47 members.

40 At Stage One, the officers proposed a council of 44 members in order to "seek a compromise" between proposals for significant increases and decreases in council size which had been suggested by the different groups on the Council. Their proposed 44-member council size "received broad agreement from the political groups presently represented on the Council". At Stage One, the Conservative and Labour Groups modelled their schemes, to varying degrees, on the officers' 44-member scheme. The Conservative Group supported the proposed 44-member council, arguing that this "will not affect adversely the council's ability to carry out convenient and effective local government" and would allow for "suitable solutions" for the representation of Priory and Sutton-at-Hone & Hawley wards. The Labour Group proposed a 45-member council as a result of its modifications to the officers' scheme in the centre of Dartford town. However, it did not put forward any evidence or argumentation in support of a 45-member council. Swanscombe & Greenhithe Town Council and Swanscombe & Greenhithe Residents' Association based their proposals on the officers' scheme with modifications in the Swanscombe

and Greenhithe area council. They based their proposals on a 46-member scheme, purely as a result of proposals to increase the level of representation in the north-east of the borough.

41 In our draft recommendations report we considered that the officers' proposal for a 44-member council would result in the best balance between electoral equality and the representation of community identities and interests across the borough. We noted, in particular, that there would be a better distribution of councillors across the borough under a 44-member council rather than under a 45 or 46 member council. We also recognised that a marginal decrease in the number of councillors received general support. We therefore concluded that the statutory criteria would best be met by a council of 44 members.

42 At Stage Three, the Conservative Group proposed a 45-member council, in order to retain a three-member Longfield ward and a single-member Southfleet ward. It also considered that a 45-member council would be "conducive" to members of the Borough Council fulfilling their roles and functions. The proposals of Powdermill Lane Residents' Association for Wilmington and of Swanscombe & Greenhithe Residents' Association and Swanscombe & Greenhithe Town Council for Swanscombe & Greenhithe would result in 45-member and 46-member councils respectively. However, these groups did not put forward evidence as to why these council sizes would better represent the borough as a whole.

43 We note that our proposed 44-member council has not received opposition. While proposals have been put forward resulting in alternative council sizes at Stage Three, the reasoning behind these proposals is focused on increasing the level of representation in specific parts of the borough without regard to the impact on the borough as a whole. Therefore, we have not been persuaded that an alternative council size would offer improved representation and remain convinced that a 44-member council would facilitate effective and convenient local government in Dartford.

Electoral Arrangements

44 As set out in our draft recommendations report, we carefully considered all the representations received at Stage One. From these representations, some considerations emerged which helped to inform us when preparing our draft recommendations. While we judged that there was merit in all of the borough-wide schemes, we considered that the officers' proposals would generally provide a better balance between electoral equality and the statutory criteria than either the current arrangements or the other schemes submitted at Stage One. We were particularly concerned that the boundaries proposed by the Conservative and Labour Groups would not be as clearly identifiable as those put forward by the officers, and that the proposals of the Conservative and Labour Groups would not offer the best possible reflection of community identities and interests. We also noted that there was consensus behind large elements of the officers' proposals. We concluded therefore that we should base our recommendations on the officers' scheme. However, in order to offer more clearly identifiable boundaries and to have greater regard to local community identities and interests, we moved away from the officers' proposals in Dartford town and in Castle and Stone wards.

45 With the exception of our proposals for Southfleet and Wilmington, we note that our recommendations have largely been supported at Stage Three and we are content to endorse the

majority of our draft recommendations as final. However, in the light of further evidence and local support, we have been persuaded to move away from our recommendations in a number of wards. We propose minor amendments to the proposed boundaries of Greenhithe, Heath, Joydens Wood, Littlebrook, Newtown, Princes, Swanscombe and Wilmington wards, as proposed by the Borough Council, the officers and the Conservative Group, in order to offer more clearly identifiable and coherent boundaries. These changes would have a minimal effect on electoral variances.

46 While we note that our proposed Longfield & Southfleet ward has met considerable opposition at Stage Three, in the interests of electoral equality it is necessary to combine Southfleet with a neighbouring area, as the existing ward does not contain enough electors to merit a whole councillor. Proposals to retain the existing arrangements would also result in a 45-member council and we do not consider that the borough-wide implications of such a council size have been addressed. Our proposal to combine the existing Southfleet and Longfield wards avoids warding Southfleet parish. We also note that the two areas share strong road links, and that our proposal would address existing anomalies under which rows of houses are divided by the boundary of the existing Longfield ward. We are content that our proposal offers the best possible balance between electoral equality and the statutory criteria and propose adopting this arrangement as part of our final recommendations.

47 With regard to Wilmington, we have received a number of objections to our proposal to combine the eastern part of Wilmington parish with Princes ward. However, our draft recommendation has also received support. We have considered the alternative proposal, put forward by the Powdermill Lane Residents' Association, and other possible alternatives to avoid warding part of Wilmington parish with Princes ward. However, Powdermill Lane Residents' Association's proposals would result in a change of council size which was not supported by evidence. They would also use the existing boundaries of Wilmington parish, which have been defaced by modern housing developments. We are particularly concerned that the proposal to divide the self-contained area of Joydens Wood would have an adverse effect on the representation of local community identities and interests. Also, these proposals would involve dividing the Leyton Cross area of Wilmington parish from those areas to which it is directly connected by road. Powdermill Lane Residents' Association's proposals would result in worse levels of electoral equality than our draft recommendations. We have also been persuaded by the Conservative Group's argument that the Oakfield area of Wilmington shares community interests with Princes ward because residents of both areas use shopping facilities at the junction of Lowfield Street and Oakfield Lane.

48 For borough warding purposes, the following areas, based on existing wards, are considered in turn:

- (a) Gundulf, Joyce Green, Littlebrook, Newtown and Priory wards;
- (b) Heath, Maypole, Miskin, Princes, Wilmington Central, Wilmington East and Wilmington West wards;
- (c) Galley Hill, Greenhithe, Horns Cross, Stone and Swanscombe wards;
- (d) Bean, Brent, Darenth, Longfield, Southfleet and Sutton-at-Hone & Hawley wards.

49 Details of our final recommendations are set out in Figures 1 and 2, and illustrated on Map 2 and on the large map inserted at the back of this report.

Gundulf, Joyce Green, Littlebrook, Newtown and Priory wards

50 The existing wards of Gundulf, Joyce Green, Littlebrook, Newtown and Priory cover the north-western area of the borough and the north of Dartford town, which is unparished. Gundulf and Newtown wards are each currently represented by three councillors, Joyce Green and Littlebrook wards are each represented by two councillors and Priory ward is represented by a single councillor. Under the current arrangements of a 47-member council, the number of electors per councillor in the five wards varies from the borough average by 20 per cent, 1 per cent, 12 per cent, 2 per cent and 21 per cent respectively. This level of electoral equality is projected to deteriorate in Joyce Green and Newtown wards, both of which would vary by 9 per cent from the borough average in 2005, while the level of electoral equality is projected to improve in Gundulf, Littlebrook and Priory wards to vary by 13 per cent, 2 per cent and 12 per cent respectively.

51 At Stage One, the officers proposed that this area should comprise five wards, with the proposed Newtown and West wards each being represented by three councillors and Joyce Green, Littlebrook and Town wards each being represented by two councillors. They proposed that Joyce Green and Littlebrook wards should continue to represent the Temple Hill area, which they considered to be a distinct community. However, they proposed that the north-eastern boundary of Littlebrook ward should be extended to follow the new Stone parish boundary in order to include the industrial riverside area, which shares road links with the existing Littlebrook ward. They proposed that Newtown ward should comprise the existing ward, less that part to the west of Merryweather Close and Mount Pleasant Road, in order to offer improved levels of electoral equality. They also proposed including the whole of the estates in the Milestone area on the eastern side of the M25, arguing that these communities share facilities with each other.

52 They put forward a new Town ward, comprising the whole of the town centre of Dartford and the whole of Priory ward in order to combine these two distinct communities within a single ward. They argued that this would result in a “distinct ward” with good levels of electoral equality. This new ward would comprise the existing Priory ward, the remainder of the existing Newtown ward, that part of the existing Gundulf ward to the east of Anne of Cleves Road, Priory Hill and Priory Place, that part of the existing Miskin ward to the east of Highfield Road and that part of the existing Princes ward to the north of Vauxhall Place. They proposed a new West ward which would include the West Hill area of Dartford town and the new West Hill Hospital development, in order to create a ward with reasonable levels of electoral equality. They proposed that this ward should comprise the remainder of the existing Gundulf ward and that part of the existing Miskin ward to the west of Highfield Road and east of Devonshire Avenue and Sullivan Close.

53 At Stage One, the Conservative Group proposed that this area should comprise five wards, with the proposed wards of Newtown & Milestone and West Hill each being represented by three councillors, Joyce Green and Littlebrook wards each being represented by two councillors, while Priory ward would be represented by a single councillor. It proposed that Joyce Green ward should comprise the majority of the existing ward, less Hardy Grove and the area to the south of University Way, in order to offer a clearer boundary and to combine the whole of the riverside

area in a single ward. It argued that Littlebrook ward should comprise the majority of the existing ward and the remainder of Joyce Green ward. It proposed that Newtown & Milestone ward should comprise the majority of the existing ward and the western part of the existing Stone ward. It proposed that Priory ward should comprise the existing ward and that West Hill ward should comprise the western parts of the existing Gundulf and Miskin wards. It argued that this ward should be named West Hill, because West Hill is located within this ward, so that this ward name would avoid confusion with the county division of West Dartford. It raised concerns regarding the officers' proposal to move away from using the River Darent as a boundary in their proposed Town ward, arguing that the River Darent is "a clearly defined ward boundary, reflecting community ties".

54 At Stage One, the Labour Group proposed that this area should comprise five wards, with the proposed wards of Dartford West and Newtown each being represented by three councillors and Joyce Green, Littlebrook and Priory wards each being represented by two councillors. It supported the officers' proposed boundaries for Joyce Green, Littlebrook and West wards. However, it suggested that the officers' proposed West ward should be named Dartford West. It proposed that the officers' proposed Newtown ward should include the whole of the existing Newtown ward, using the River Darent as its western boundary. It also put forward a modified version of the officers' proposed Town ward, excluding that part of the existing Princes ward which the officers proposed including in the ward. It also proposed that this ward should be named Priory after the existing ward that forms the northern part of the proposed ward.

55 In drawing up our draft recommendations, we carefully considered the representations received at Stage One and while we noted that there was merit in all three schemes, we considered that the officers' scheme would offer the best balance between electoral equality and the statutory criteria, while using clearly identifiable boundaries and having regard to community identities and interests. We did not consider that the Conservative Group's proposal to include the riverside area in Joyce Green ward, to the north of the existing Littlebrook ward, would offer a better representation of the communities concerned, given that it would involve dividing the riverside development from those parts of the existing Littlebrook ward to which they are directly connected by road. The officers' and Labour Group's schemes for Joyce Green and Littlebrook wards would retain these links and would also largely retain the well-established existing ward boundaries with minor amendments in order to offer more easily identifiable boundaries.

56 We considered that the officers' proposed Town and West wards utilise strong boundaries and combine similar communities. We were concerned that the southern boundary of the Labour Group's proposed Priory ward would divide areas of similar character in the town centre which are closely connected by road. We were also concerned that the Conservative Group's proposed West Hill ward appeared to divide communities on Shepherds Lane and Somerset Road. While we appreciated that the Priory ward area is distinct and self-contained we noted that it has strong road links with the town. We were content, therefore, that the two areas should be combined in a new Town ward, as proposed by the officers. While we supported the officers' proposed West ward, we considered that the Conservative Group's proposal to name the western town ward West Hill would better reflect this area, given the Hill's central position in this area and to avoid confusion between the borough ward and the county division.

57 Having considered the representations received, we decided to adopt the officers' scheme as the basis for our draft recommendations. However, we considered that the boundaries of Joyce Green, Newtown, Town and West Hill wards should be amended in order to offer more clearly identifiable boundaries. In Joyce Green ward the officers and the Labour Group both proposed retaining the existing ward boundaries. While this proposal would offer good levels of electoral equality, the Conservative Group proposed a minor modification to the existing arrangements in order to offer a more clearly identifiable boundary and to ensure that Hardy Grove would be included in a ward with those areas to which it is directly connected by road. We considered that the Conservative Group's proposal to clarify the boundaries of the existing Joyce Green ward would offer clearer boundaries and a better reflection of community links; therefore we proposed that the north-eastern boundary of the existing Joyce Green ward should be amended to follow the clearly identifiable boundary of the centre of Marsh Street, to the north of Henderson Drive.

58 While we considered that the officers' proposals for the east of Newtown ward would respect community identity and offer clear boundaries, we shared the concerns of the Conservative and Labour Groups that the River Darent should continue to be utilised as the western boundary of the ward. We were content that the river forms a clear and significant geographical feature and proposed using it as a boundary throughout the borough. We therefore supported the Labour Group's proposal for the river to form the western boundary of the officers' proposed Newtown ward. This would have a minimal effect on the level of electoral equality in Newtown ward. However, in order to address the consequential alteration in the level of electoral equality in the proposed Town ward, we proposed that the area of the existing Miskin ward comprising Rutland Close and Summerhill Road should be transferred to Town ward. In order to address the resulting inequalities in West Hill ward, we proposed transferring the remainder of the existing Miskin ward, comprising Devonshire Avenue and the adjoining field, to West Hill ward. We considered that the areas which we proposed combining are well connected by road and are of a similar character.

59 Under our draft recommendations for a 44-member council, there would be improved electoral equality, with the number of electors per councillor varying from the borough average in Joyce Green, Littlebrook, Newtown, Town and West Hill wards by 8 per cent, 6 per cent, 13 per cent, 5 per cent and 8 per cent respectively. This level of electoral equality is projected to improve over the next five years to vary by 1 per cent, 3 per cent, 6 per cent and 6 per cent in Joyce Green, Littlebrook, Newtown and West Hill wards in 2005. The level of electoral equality would deteriorate marginally in Town ward, to vary by 7 per cent from the borough average in 2005.

60 At Stage Three the officers proposed a minor amendment to the boundary of the proposed Littlebrook and Newtown wards in order to use the more clearly identifiable boundary of the Dartford Tunnel approach road. This would involve the transfer to Newtown ward of the small area between the railway line and the approach road, which does not contain any electors. This proposal was supported by the Conservative and Labour groups.

61 Subject to the above amendment, as proposed by the officers, the Conservative Group supported our recommendations for Joyce Green and Littlebrook wards. It supported our proposal for the River Darent to form the western boundary of the proposed Newtown ward, and the inclusion of the Milestone area to Newtown ward. However, it raised concerns regarding the

proposed eastern boundary of Newtown ward, arguing that it involved some roads being detached from areas to which they are closely linked. It proposed that Burman Close, Cugley Road, Horsfield Close and 154-174 Watling Street should be transferred from Stone to Newtown wards. It argued that these streets do not share direct road access with adjacent areas with which we proposed combining them, and it considered that residents of these streets “share a community of outlook” with areas to the west. It objected to our proposal to combine the existing Priory ward with areas to the south in a Town ward. It argued that, while it supports the composition of the rest of Town ward, the existing Priory ward forms a “self-contained” development, which does not have strong road links with Dartford town centre. Therefore, it proposed dividing the proposed Town ward along the railway line to retain the existing boundaries of Priory ward. While it supported the name and the majority of the proposed boundaries of West Hill ward, it objected to the proposal to include the Priory Gardens area in West Hill, arguing that this area associates with the Town centre. As a result, it proposed transferring Priory Gardens, Priory Place and Priory Hill from the proposed West Hill ward to the proposed Town ward.

62 Under the proposed 44-member council, the number of electors per councillor in the Conservative Group’s proposed wards of Newtown, Priory, Stone, Town and West Hill would vary from the borough average by 16 per cent, 13 per cent, 1 per cent, 12 per cent and 12 per cent respectively. This level of electoral equality is projected to improve in Newtown, Priory, Town and West Hill wards over the next five years, to vary by 9 per cent, 5 per cent, 8 per cent and 10 per cent respectively. The level of electoral equality in Stone ward is projected to deteriorate, to vary by 6 per cent from the borough average in 2005.

63 Having carefully considered the representations received, we have decided largely to endorse our draft recommendations for this area. We note that our proposals have received some local support. However, we consider that the officers’ proposal to clarify the boundary between Littlebrook and Newtown wards would offer a more clearly identifiable boundary as it would use the length of the Dartford Tunnel approach road as the eastern boundary of Littlebrook ward. Therefore, we propose amending the proposed ward boundaries, which would not affect any electors. We have not been persuaded that the Conservative Group’s proposals to transfer part of the proposed Stone ward to Newtown ward and part of the proposed West Hill ward to Town ward would offer improved community representation given that there is no evidence that these proposals have local support. Similarly, we have not been persuaded to divide the proposed Town ward into Priory and Town wards, as proposed by the Conservative Group. This proposal has not received any support, and therefore we have not been persuaded that local residents would consider this option would better represent their community identities and interests. We also note that there are direct road links between the northern and southern parts of the proposed Town ward. Therefore, we are content to endorse our draft recommendations for this area with the one minor boundary amendment which would have no effect on electoral variances. Our final recommendations are illustrated in Figures 1 and 2, on Map 2 and on the large map at the back of the report.

Heath, Maypole, Miskin, Princes, Wilmington Central, Wilmington East and Wilmington West wards

64 The existing wards of Heath, Maypole, Miskin, Princes, Wilmington Central, Wilmington East and Wilmington West cover the south-western area of the borough and the south of Dartford

town and include the parish of Wilmington. Heath and Princes wards are each currently represented by three councillors, Maypole, Miskin and Wilmington West wards are each represented by two councillors, and Wilmington Central and Wilmington East wards are each represented by a single councillor. Under the current arrangements of a 47-member council, the number of electors per councillor in the seven wards varies from the borough average by 1 per cent, 3 per cent, 16 per cent, 1 per cent, 33 per cent, 5 per cent and 13 per cent respectively. This level of electoral equality is projected to deteriorate in Heath, Maypole, Miskin, Princes and Wilmington West wards which would vary by 7 per cent, 12 per cent, 23 per cent, 3 per cent and 20 per cent from the borough average in 2005, while the level of electoral equality is projected to improve in Wilmington Central and Wilmington East wards which would vary by 24 per cent and 1 per cent respectively.

65 At Stage One, the officers proposed that this area should be represented by five wards, with the proposed wards of Heath and Joydens Wood each being represented by three councillors, Princes and Wilmington wards each being represented by two councillors, and Fairfield ward being represented by a single councillor. They suggested that Fairfield ward should comprise that part of Princes ward bounded by Heath Lane, Heath Street, Princes Road, Vauxhall Place and the River Darent. They proposed that Heath ward should combine the existing ward with that part of Miskin ward to the west of Devonshire Avenue, Rosebery Gardens and Shepherds Lane, that part of Princes ward containing the Windermere Close area, the heath and golf course, in order to include the small area of development which extends just beyond the boundary of the existing Heath ward. They also proposed including that part of Wilmington Central ward that lies to the north of the Wilmington parish boundary so that the new ward boundary of Wilmington Central ward would follow the northern Wilmington parish boundary.

66 They put forward a Joydens Wood ward comprising the existing Maypole ward and the majority of the existing Wilmington West ward, excluding properties on Hook Green Lane and to the north. They argued that this ward would combine the three distinct geographical communities of Joydens Wood, Maypole and the new development on the site of Bexley Hospital. They proposed that the remainder of Princes ward should be combined with that part of the existing Wilmington East ward that lies to the north-east of Carsington Gardens, Church Hill, Hawley Road, Oakfield Lane and Oakfield Park Road, arguing that the shopping centre and schools in this area form the focus of the whole community in the revised Princes ward. They proposed that Wilmington ward should comprise Wilmington Central ward and the remainder of Wilmington East and Wilmington West wards, arguing that this ward retains those areas which have community ties, while excluding those parts of Wilmington parish which share strong links and a sense of identity with areas outside the parish.

67 In their Stage One submission the Conservative Group proposed that this area should be represented by five wards, with the proposed wards of Heath, Princes and Wilmington each being represented by three councillors, Maypole ward being represented by two councillors, and Anne of Cleves ward by a single councillor. It proposed that Anne of Cleves ward should comprise the eastern part of the existing Gundulf ward, the north-eastern part of the existing Miskin ward, and the northern part of the existing Princes ward. It put forward a Heath ward comprising the existing ward, together with the western edge of Miskin ward, and that part of the existing Princes ward containing development on the boundary of the existing Heath ward. It proposed a Maypole ward comprising the existing Maypole ward less the eastern part. It proposed that

Princes ward should comprise the remainder of the existing Princes ward and the north-eastern part of the existing Wilmington East ward. It argued that this was preferable to the officers' proposed Fairfield and Princes wards which would divide the Tree Estate community. It also stated that its proposals for the boundary with Wilmington ward would better reflect community identity. Its proposed Wilmington ward would comprise the remainder of Maypole, Wilmington Central, Wilmington East and Wilmington West wards.

68 At Stage One, the Labour Group proposed that this area should be represented by five wards, with the proposed wards of Heath, Joydens Wood and Princes each being represented by three councillors, Wilmington ward being represented by two councillors, and The Dell ward being served by a single councillor. It proposed a Heath ward comprising the existing Heath ward, the western part of the existing Miskin ward and that part of Wilmington Central ward to the north of the parish boundary and west of Heath Lane. It proposed that Joydens Wood ward should combine the majority of the existing Maypole ward, the south-western part of Wilmington Central ward, and the southern part of Wilmington West ward. This ward would unite the whole Joydens Wood area which it considered has a clear community identity. It argued that Princes ward should comprise the existing Princes ward, in order to unite the whole of the Tree Estate, and that part of the existing Wilmington Central ward lying to the north of the parish boundary and east of Heath Lane. It put forward The Dell ward comprising the remainder of Maypole and Wilmington West wards. It also proposed a Wilmington ward comprising the remainder of Wilmington Central ward and Wilmington East ward. It argued that this ward would reflect the area's community identity.

69 Having carefully considered the representations received at Stage One, we considered that the officers' scheme would reflect the communities in the area, offer clear boundaries and result in good levels of electoral equality. We decided therefore to adopt this scheme as our draft recommendation for this area with some modifications. We noted that the Conservative and Labour Groups' proposals for this area had merit and shared a number of similarities with the officers' proposals. However, we were concerned that the Conservative Group's proposed Heath ward would divide the communities on Shepherds Lane and Sullivan Close, while its proposed Princes ward would divide the properties to the east of Lowfield Street from the areas to which they are directly connected by road. We also considered that it had proposed a less clearly identifiable boundary between Princes and Wilmington wards.

70 We were concerned that the Labour Group's proposed Heath ward failed to incorporate the development beyond Heath Lane, which is directly connected to the rest of the existing Heath ward. Its proposed Princes ward would also have divided the community in the centre of Dartford town. We considered that there was merit in the Labour Group's proposal to combine the whole of Joydens Wood in a single ward. We also had some support for its proposal to combine the Bexley Hospital Estate with those parts of Wilmington with which it shares road links. We had some concern regarding the officers' proposal to combine the Hospital development with the Joydens Wood area, with which it does not share road links. However, we considered that residents of the Bexley Hospital Estate would use facilities in the Joydens Wood area, and there are footpaths connecting the two areas. Also, we were not persuaded to adopt the Labour Group's The Dell ward, given that it would divide the Leyton Cross area from Wilmington Village, to which it is directly connected. Therefore, we accepted that the officers' proposal for Joydens

Wood offers the best balance between the reflection of community identity and interests and electoral equality.

71 While we considered that the officers proposed clearly identifiable boundaries for Fairfield and Princes wards, we agreed with the Conservative and Labour Groups that the Tree Estate should be represented in a single ward, given the strong shared community identity and interests among residents of the estate. Therefore, we proposed combining the officers' proposed Fairfield and Princes wards to form a three-member Princes ward. As detailed above, in order to address the deterioration in the levels of electoral equality in the modified Town ward, we made modifications to the officers' proposed boundaries of Heath, Town and West Hill wards. As a result, we proposed that Devonshire Avenue, in the existing Miskin ward, should be excluded from the proposed Heath ward and included in West Hill ward, in order to provide a reasonable level of electoral equality. We considered that the areas we proposed combining share strong road links and are of a similar character.

72 Under our draft recommendations for a 44-member council there would be improved electoral equality, with the number of electors per councillor varying from the borough average in Heath, Joydens Wood, Princes and Wilmington wards by 9 per cent, 2 per cent, 6 per cent and 4 per cent respectively. This level of electoral equality was projected to improve over the next five years to vary by 2 per cent and 5 per cent in Heath and Princes wards in 2005, while deteriorating marginally in Joydens Wood ward to vary by 7 per cent, with the number of electors per councillor continuing to vary by 4 per cent from the borough average in Wilmington ward.

73 At Stage Three the Borough Council proposed a minor amendment to the boundary of Joydens Wood and Wilmington wards, in order to combine all the properties on Rowhill Road in Wilmington ward. This change would affect a minimal number of electors and would result in the level of electoral equality in Joydens Wood and Wilmington wards varying by 1 per cent and 4 per cent from the borough average. This level of equality would deteriorate marginally over the next five years to vary by 7 per cent in Joydens Wood ward, while continuing to vary by 4 per cent from the borough average in Wilmington ward in 2005. The Conservative Group supported this proposal, emphasizing that these properties do not have a direct road connection with Joydens Wood. The Borough Council also urged us to "revise" our proposals for Wilmington in order to "reflect the local community identity". In particular, it supported incorporating the proposed Oakfield parish ward into a Wilmington borough ward. The Conservative Group objected to this proposal, arguing that the transfer of the Oakfield area to Wilmington ward would result in poor levels of electoral equality. It also drew attention to the fact that the Wilmington parish boundary has been defaced by recent development in this area and runs through houses and gardens. The proposal to use this section of the parish boundary as a borough ward boundary would also result in dividing Oakfield Lane and Wilmington Park Road between wards. As a result, the Conservative Group supported the "better geographical boundary" in our draft recommendations and it considered that our draft recommendations for this area better "reflect community identities".

74 The officers proposed a minor amendment to the boundary of the proposed Wilmington ward in order to use the clear boundary of the A2 to a greater extent. They proposed transferring the land between the A2 and Wilmington parish boundary from the proposed Heath and Princes wards to Wilmington ward. This area does not contain any electors. This proposal was supported

by the Conservative and Labour groups. The Conservative Group argued that this amendment would ensure this small area of land would be included in a ward with Oakfield Lane and Hulsewood Close whose residents have an interest in its use.

75 In addition to the above comments, the Conservative Group noted its support for our proposed Heath, Joydens Wood, Princes and Wilmington wards. It particularly supported transferring parts of the existing Miskin and Princes wards to the proposed Heath ward, with which it argued these areas have a “stronger affinity”. It argued that our proposal to combine the Bexley Hospital site with Joydens Wood made sense given that residents of Joydens Wood use the sports facilities at the old hospital site. It opposed alternative proposals to divide Leyton Cross from Wilmington village, asserting that the village is a “strong focus” for the area. It also supported our draft recommendations for the east of Wilmington, arguing that the urban development along Hawley Road “has left the parish boundary indistinguishable”. It highlighted the fact that residents of Hawley Road, Powder Mill Lane, Walnut Tree Avenue, and the Tree Estate all share facilities at the junction of Lowfield Street and Oakfield Lane, within the proposed Princes ward, which forms a “focus of community identity”.

76 At Stage Three, the Labour Group objected to our draft recommendations for Wilmington. It asserted that our proposals for Wilmington fail to “reflect the deep and historic community identity that exists within Wilmington Parish”. In particular, it objected to our proposal to combine the Oakfield area with Princes ward, claiming that this area identifies with Wilmington, rather than the Princes part of Dartford. It suggested that possible options for the south-west of the borough would be to respect parish boundaries at borough ward level and create three two-member wards, or a one-, two- and three-member ward. However, it did not put forward boundary proposals.

77 Wilmington Parish Council objected to our draft recommendations to combine the east of Wilmington parish with Princes ward. It asserted that residents of the Oakfield area of Wilmington do not have a “natural affinity” with Princes ward. It suggested that an alternative would be to retain the existing Wilmington wards, with an amendment to transfer parts of the existing Wilmington Central ward to Wilmington West ward, in the interests of electoral equality. However, it did not propose specific boundaries.

78 The Powdermill Lane Residents’ Association objected to our proposal to combine part of Wilmington with Princes ward. It asserted that the eastern part of Wilmington has “nothing in common” with Princes ward. It proposed that the existing arrangements should be retained, with a minor boundary amendment between Wilmington Central and Wilmington West wards in order to address levels of electoral equality.

79 Under its proposal, which would result in a 45-member council, the number of electors per councillor would vary from the borough average in Maypole, Princes, Wilmington Central, Wilmington East and Wilmington West by 7 per cent, 8 per cent, 7 per cent, 9 per cent and 6 per cent respectively. This level of electoral equality is projected to improve in Wilmington Central and Wilmington East wards over the next five years which would vary by 2 per cent and 5 per cent respectively, while continuing to vary by 7 per cent and 8 per cent in Maypole and Princes wards. The level of electoral equality in Wilmington West ward is projected to deteriorate, to vary by 14 per cent from the borough average by 2005.

80 The Wilmington Society objected to our proposal to combine part of Wilmington with Princes ward arguing that it would break local ties. It supported respecting the boundaries of Wilmington parish. Two local councillors opposed our proposal to combine part of Wilmington with Princes ward and suggested an alternative, although they did not put forward specific boundary proposals. One argued that our proposals do not respect “natural community boundaries”, arguing that people in the Oakfield area have a “great affinity” with Wilmington. As an alternative, he proposed that the existing Wilmington Central and Wilmington East wards should be combined, and that the western parts of the existing Wilmington Central should be combined with the existing Wilmington West ward. The other councillor suggested retaining two single-member Wilmington Central and Wilmington East wards.

81 Having carefully considered the representations received, we have decided largely to endorse our draft recommendation for this area. We recognise that our draft recommendation to combine the north-eastern part of Wilmington with Princes ward has received opposition at Stage Three, although it has also received support. We have considered the alternative proposal put forward by the Powdermill Lane Residents’ Association, and possible alternatives to avoid warding part of Wilmington parish with Princes ward. However, proposals to use the existing boundaries of Wilmington parish would involve using a boundary which has been defaced by modern housing developments, and they would also result in worse levels of electoral equality than our draft recommendations. We are also concerned that Powdermill Lane Residents’ Association’s proposal would involve dividing the self-contained area of Joydens Wood, which we consider would adversely effect the representation of community identities and interests in this area. Also, this proposal would involve dividing the Leyton Cross area of Wilmington parish from those areas to which it is directly connected by road. We have been persuaded by the Conservative Group’s argument that the Oakfield area of Wilmington shares community interests with Princes ward given that residents of both areas share shopping facilities at the junction of Oakfield Lane and Lowfield Street. As a result, we are content that our draft recommendations for this area offer the best balance available between electoral equality and the statutory criteria.

82 In the light of further evidence we have been persuaded to move away from our draft recommendations and modify the proposed northern boundary of Wilmington ward, as put forward by the officers. We consider that this proposal would use a clearly identifiable boundary and would ensure that the area to the north of Oakfield Lane, whose residents have an interest in its use, would be combined with the lane. We have also been persuaded that the Borough Council’s proposal to address an anomalous boundary between Joydens Wood and Wilmington wards is preferable to our draft recommendation. We consider that this proposal would offer a more coherent boundary between communities and would also offer marginally improved levels of electoral equality. Elsewhere, in the light of the support that our draft recommendations received, we are confirming them as final. Our final recommendations are illustrated in Figures 1 and 2, on Map 2 and on the large map at the back of this report.

Galley Hill, Greenhithe, Horns Cross, Stone and Swanscombe wards

83 The existing wards of Galley Hill, Greenhithe, Horns Cross, Stone and Swanscombe cover the north-eastern area of the borough and include the parishes of Stone and Swanscombe & Greenhithe. Stone ward is currently represented by three councillors, Galley Hill, Greenhithe and Swanscombe wards are each represented by two councillors, and Horns Cross ward is served by

a single councillor. Under the current arrangements of a 47-member council, the number of electors per councillor in the five wards varies from the borough average by 15 per cent, 12 per cent, 1 per cent, 23 per cent and 22 per cent respectively. This level of electoral equality is projected to deteriorate in Greenhithe, Horns Cross, Stone and Swanscombe wards, which would vary by 60 per cent, 9 per cent, 31 per cent and 29 per cent from the borough average in 2005, while the level of electoral equality is projected to improve in Galley Hill ward to vary by 13 per cent.

84 At Stage One, the officers proposed that this area should comprise four wards, with the proposed wards of Greenhithe, Stone and Swanscombe each being represented by three councillors, and a new Castle ward being represented by a single councillor. They proposed that Castle ward should comprise that part of the existing Stone ward that lies to the north-east of Cowley Avenue, Dawes Close, Hedge Place Road, Perkins Close, London Road and Steele Avenue. They proposed that the remainder of Stone ward should be combined with the existing Horns Cross ward to form a new Stone ward. They proposed retaining the existing boundaries of Greenhithe ward and put forward a Swanscombe ward comprising the existing Galley Hill and Swanscombe wards. The Labour Group supported the officers' Stage One proposals for this area.

85 The Conservative Group proposed that this area should comprise four wards, with the proposed wards of Greenhithe, Stone and Swanscombe each being represented by three councillors, while Knockhall ward would be represented by a single councillor. It proposed that Greenhithe ward should comprise the existing ward less the western part, which it proposed combining with the eastern part of Stone ward to form Knockhall ward. It proposed that Stone ward should comprise the existing Horns Cross ward and the remainder of the existing Stone ward while Swanscombe ward should comprise the existing wards of Galley Hill and Swanscombe, as under the officers' scheme.

86 At Stage One, Swanscombe & Greenhithe Town Council and Swanscombe & Greenhithe Residents' Association proposed that the Greenhithe and Swanscombe area should be represented by eight borough councillors representing four two-member wards – Galley Hill, Greenhithe, Knockhall and Swanscombe. They proposed that Galley Hill ward should comprise the existing Galley Hill ward and that part of the existing Swanscombe ward lying to the north of Ames Road and Milton Street, with the remainder of the existing Swanscombe ward forming a new Swanscombe ward. They proposed that Greenhithe ward should comprise that part of the existing Greenhithe ward that lies to the north of London Road, while the remainder of the existing Greenhithe ward should form a new Knockhall ward, following the existing boundary of Swanscombe & Greenhithe parish. They argued that the level of representation in Swanscombe and Greenhithe should be increased in order to allow for significant development in the area before 2008.

87 Under the proposals of Swanscombe & Greenhithe Town Council and Residents' Association for a 46-member council, the level of electoral equality in Galley Hill, Greenhithe, Knockhall and Swanscombe wards would vary from the borough average by 17 per cent, 71 per cent, 19 per cent and 24 per cent respectively. This level of electoral equality was projected to improve over the next five years in Galley Hill, Greenhithe and Knockhall wards which to vary by 15 per cent, 27 per cent and 17 per cent respectively in 2005, while the level of electoral

equality in Swanscombe ward was projected to deteriorate to 31 per cent from the borough average.

88 A local councillor proposed that the Stone Castle area of the existing Stone ward should be combined with the north-eastern part of Stone ward to form a two-member Stone East ward, with the remainder of the existing Stone ward forming a two-member Stone West ward.

89 In drawing up our draft recommendations, we carefully considered the representations received at Stage One. As a result, we judged that the officers' scheme would offer the best balance between electoral equality and the statutory criteria for this area. There was a consensus of support at Stage One for significant elements of the officers' proposals for this area. With regard to the proposed Castle ward, although the Conservative Group and a local councillor proposed different warding arrangements for this area, they drew attention to the distinct community around Stone Castle which they argued should be reflected in a ward separate from the remainder of Stone parish. We considered, therefore, that the officers' proposal to create a separate Castle ward would best represent local communities. The officers' proposed Stone ward used clearly identifiable boundaries and combined closely connected communities, while we considered that the Conservative Group's proposals for Stone ward divided the estates to the east of the M25 from the parts of Newtown ward with which they share strong road links. Also, given that we adopted the officers' proposed boundaries for the west of Stone ward, we estimated that the wards suggested by a local councillor (no detailed boundaries were provided) would provide worse levels of electoral equality than the officers' scheme. We noted that the officers' scheme received support while we were not convinced that the Conservative Group's or the local councillor's proposals would receive local support.

90 With regard to Greenhithe and Swanscombe wards, we considered that the officers' scheme would offer the best representation of this area given that their proposals received local support and appeared to respect the clear communities of Greenhithe and Swanscombe. We did not consider that the Conservative Group's proposed Greenhithe and Knockhall wards would offer improved community representation, given that they would result in the Knockhall area being divided from those parts of Greenhithe to which it is closely connected by road and with which it shares facilities. We were not persuaded by Swanscombe & Greenhithe Town Council's and Swanscombe & Greenhithe Residents' Association's proposals for this area, given that they would have resulted in extremely poor levels of electoral equality in both 2000 and 2005. Therefore, we were content to base our proposals for this area on the officers' scheme. However, we noted in our draft recommendations report that the southern part of the proposed boundary between Greenhithe and Swanscombe wards used the existing borough ward and parish ward boundary which is currently undefined. We sought local advice at Stage Three as to where this boundary would be best placed in order to tie it to ground detail.

91 Having considered the officers' proposals, we considered that minor amendments should be made to the boundary between the officers' proposed Castle and Stone wards in order to create a clearer boundary between communities. That part of the officers' proposed Castle ward to the north of the railway is of a similar character and is well connected to that part of the proposed Stone ward to the north of the railway. We considered, therefore, that these areas would be best combined within the proposed Stone ward in order to offer improved representation of

communities. We also considered that the southern boundary of the proposed Castle ward should be amended to follow the clearer boundary of the Bluewater road, rather than the cliff edge.

92 Under our draft recommendations for a 44-member council there would be improved electoral equality, with the number of electors per councillor varying from the borough average in Castle, Greenhithe, Stone and Swanscombe wards by 34 per cent, 30 per cent, 2 per cent and 2 per cent respectively. This level of electoral equality was projected to improve over the next five years to vary by 1 per cent in Castle ward in 2005 and to equal the borough average in Greenhithe ward, while deteriorating marginally in Stone ward to vary by 3 per cent, with the number of electors per councillor continuing to vary by 2 per cent from the borough average in Swanscombe ward.

93 At Stage Three, the Conservative Group supported our proposals for Castle, Greenhithe, Stone and Swanscombe wards, subject to a boundary amendment. It proposed that the boundary between the proposed Greenhithe and Swanscombe wards should be redefined in order to include the whole of the Eastern Quarry in Greenhithe ward. This would tie the boundary to ground detail without affecting any electors. It asserted that Greenhithe is on a level with the western end of the quarry, while Swanscombe is situated on the cliff above, and therefore there would be “greater ease of access” between the Quarry and Greenhithe.

94 Swanscombe & Greenhithe Town Council reiterated its Stage One proposals, as detailed above, for the parish to be represented by eight councillors serving four wards. Swanscombe & Greenhithe Residents’ Association also reiterated its Stage One proposals, detailed above, to increase the level of representation of this area on the Borough Council. A local councillor accepted our proposals for Castle ward. However, he objected to our proposal to combine the remainder of the existing Stone and Horns Cross wards arguing that the two areas have “distinct” characters.

95 Having carefully considered the representations received in response to our draft recommendations, we have decided to endorse our draft recommendation for this area, subject to the boundary modification proposed by the Conservative Group. Our draft recommendations would achieve reasonable electoral equality and have received some local support. We have not been persuaded to adopt the Swanscombe & Greenhithe Town Council and Swanscombe & Greenhithe Residents’ Association’s proposals for Swanscombe and Greenhithe. As we explained in our draft recommendations report, we do not consider that their schemes would offer the best balance between electoral equality and the statutory criteria given that they would result in extremely high levels of electoral inequality. We also note that our draft recommendations for this area have received some support. We note that a local councillor objected to our proposal to combine the Horns Cross parish ward of Stone parish with the majority of Stone parish. However, we have no evidence that this proposal would receive local support, while our draft recommendations have attracted some support. Also, we remain persuaded that Horns Cross parish ward is well connected and shares a community identity with those other parts of Stone parish with which we propose combining it. Therefore, we are content that the majority of our draft recommendations for Greenhithe, Stone and Swanscombe offer the best balance between electoral equality and community representation and we are content to endorse them as final.

96 However, in our draft recommendations report we requested advice as to how best to amend the existing defaced boundary between Greenhithe and Swanscombe wards. We consider that the Conservative Group's proposal to transfer the Eastern Quarry to Greenhithe ward would offer the best solution. This change would use a clearly identifiable ward boundary and would ensure that the whole quarry would be included in a ward with those areas from which it is most easily accessed. It is not projected that there will be any electors in this area by 2005; therefore this proposal will not affect electoral variances. We have been persuaded therefore that this proposal should be adopted as part of our final recommendations. Our final recommendations are illustrated in Figures 1 and 2, on Map 2 and on the large map at the back of this report.

Bean, Brent, Darenth, Longfield, Southfleet and Sutton-at-Hone & Hawley wards

97 The existing wards of Bean, Brent, Darenth, Longfield, Southfleet and Sutton-at-Hone & Hawley cover the south-eastern area of the borough and contain the parishes of Bean, Darenth, Longfield & New Barn, Southfleet and Sutton-at-Hone & Hawley. Brent and Longfield wards are each currently represented by three councillors, Darenth and Sutton-at-Hone & Hawley wards are each represented by two councillors, and Bean and Southfleet wards are each represented by a single councillor. Under the current arrangements of a 47-member council, the number of electors per councillor in the six wards varies from the borough average by 6 per cent, 3 per cent, 15 per cent, 4 per cent, 22 per cent and 17 per cent respectively. This level of electoral equality is projected to deteriorate in Bean, Darenth, Longfield and Southfleet wards which would vary by 13 per cent, 26 per cent, 10 per cent and 26 per cent from the borough average in 2005, while the level of electoral equality is projected to improve in Sutton-at-Hone & Hawley ward to vary by 7 per cent, while continuing to vary by 3 per cent from the borough average in Brent ward.

98 At Stage One, the officers proposed that this area should comprise four wards, with the proposed wards of Bean & Darenth, Brent and Longfield & Southfleet each being represented by three councillors and Sutton-at-Hone & Hawley ward being represented by two councillors. They proposed that Brent ward should comprise the existing Brent ward, together with that part of the existing Darenth ward to the north-west of Gore Road, Trolling Down Hill and the A2. They proposed that the remainder of the existing Darenth ward should be combined with the existing Bean ward to form a Bean & Darenth ward. They put forward a Longfield & Southfleet ward comprising the existing wards of Longfield and Southfleet. They proposed retaining the existing boundaries of Sutton-at-Hone & Hawley ward.

99 The Conservative Group proposed that this area should comprise five wards, with the proposed wards of Brent and Longfield, New Barn & Southfleet each being represented by three councillors, Darenth and Sutton-at-Hone & Hawley wards each being represented by two councillors, and Bean & Betsham ward being represented by a single councillor. It proposed that the existing Bean ward should be combined with Betsham village of the existing Southfleet ward to form a Bean & Betsham ward. It put forward a Brent ward identical to that put forward by the officers, with the remainder of the existing Darenth ward forming a new Darenth ward. It opposed the officers' proposed Bean & Darenth ward and proposed that Longfield, New Barn & Southfleet ward should include the remainder of the existing Southfleet ward and the existing Longfield ward. It agreed with the officers' proposal to retain the existing boundaries of Sutton-at-Hone & Hawley ward.

100 At Stage One, the Labour Group supported the officers' proposals for this area. It noted that Southfleet is too small to remain as a single ward and that it would be preferable, therefore, to link the whole of the existing Southfleet ward with the existing Longfield ward rather than divide the existing Southfleet ward between borough wards. Southfleet Parish Council opposed any changes to the existing Southfleet ward, particularly those which would result in dividing the existing ward between wards, arguing that Southfleet parish should be retained within a single ward on the grounds of community identity. It was concerned that the interests of Southfleet residents might be unfairly dominated by the interests of the larger settlements of Longfield and Newbarn should the areas be combined in the same ward. A borough councillor opposed the Conservative Group's proposal to divide the existing Southfleet ward. We also received 42 representations from local residents in support of retaining the existing arrangements for Southfleet ward, of which 40 opposed proposals to divide the existing ward and parish.

101 In compiling our draft recommendations, we considered carefully the representations received, as a result of which we have concluded that the officers' proposals offer the best balance between electoral equality and the statutory criteria. Therefore, we were content to adopt the officers' proposals for this area in their entirety as our draft recommendations. We noted that their proposals for Brent and Sutton-at-Hone & Hawley wards received support at Stage One. While we recognised that the villages of Bean and Darenth are not directly linked, they are linked via Green Street Green, which would also be included in the officers' proposed Bean & Darenth ward. We considered that the three areas are of a rural character and share similar interests and should, therefore be combined within a single ward.

102 We considered that the officers' proposals for Southfleet would offer the best possible balance between electoral equality and the statutory criteria given that they would not involve dividing Southfleet parish between wards. While we recognised there was considerable local support for retaining the existing boundaries of Southfleet ward, we noted that this would result in poor levels of electoral equality. If the existing arrangements were retained in Southfleet ward, the number of electors per councillor under the proposed 44-member council would vary from the borough average by 22 per cent. This level of electoral equality would deteriorate further over the next five years, to vary by 26 per cent from the borough average by 2005. Therefore we did not consider that retaining the existing arrangements would provide the best balance between electoral equality and the statutory criteria. We did not consider that the Conservative Group's proposal to divide Betsham village from the rest of Southfleet parish would offer the best representation of the community in this area given the strong transport and community links between Betsham and Southfleet and the considerable opposition this proposal had received. We also noted that the Conservative and Labour Groups supported combining Southfleet with Longfield and New Barn.

103 Under our draft recommendations for a 44-member council there would be improved electoral equality, with the number of electors per councillor varying from the borough average in Bean & Darenth, Brent, Longfield & Southfleet and Sutton-at-Hone & Hawley wards by 12 per cent, 10 per cent, 14 per cent and 9 per cent respectively. This level of electoral equality was projected to improve over the next five years to vary by 7 per cent, 3 per cent and 7 per cent in Bean & Darenth, Brent and Longfield & Southfleet wards in 2005 while equalling the borough average in Sutton-at-Hone & Hawley ward.

104 In response to our draft recommendations the Conservative Group supported our draft recommendations for Bean & Darenth, Brent and Sutton-at-Hone & Hawley wards. However, it raised concerns about our proposed Longfield & Southfleet ward and supported retaining the existing Longfield and Southfleet wards as a three-member and a single-member ward. It proposed amending the name of the former ward to Longfield & New Barn in order to reflect the two areas contained in this ward, which is already recognised at parish level. It argued that our proposed Longfield & Southfleet ward failed to have due regard to the identities and interests of the distinct communities of Southfleet and Longfield & New Barn parishes.

105 Under its proposals for a 45-member council, the number of electors per councillor in the Conservative Group's proposed Longfield & New Barn and Southfleet wards would vary from the borough average by 8 per cent and 25 per cent respectively. This level of electoral equality would deteriorate over the next five years to vary by 14 per cent and 28 per cent by 2005.

106 At Stage Three, Dr Howard Stoate MP supported retaining the existing warding arrangements for Southfleet. Bean Parish Council objected to our proposal to combine the Bean with part of Darenth arguing that it would be preferable to combine Bean parish with Southfleet. Longfield & New Barn Parish Council objected to our proposal to combine Longfield & New Barn and Southfleet parishes in a borough ward. It argued that Longfield & New Barn and Southfleet parishes are geographically separate, that they have different identities and that their residents have different interests. Southfleet Parish Council and New Barn Residents' Association supported retaining the existing wards of Longfield and Southfleet and objected to our proposal to combine the two. New Barn Residents' Association asserted that our recommendations would not reflect local community interests, and would lead to the interests of Southfleet residents being outweighed by those of the larger community of Longfield & New Barn. Sutton-at-Hone & Hawley Parish Council supported our draft recommendation to retain the existing Sutton-at-Hone & Hawley ward. Southfleet Parish Residents' Association supported our proposal not to divide the parish of Southfleet between wards, but it objected to the parish being combined with Longfield & New Barn parish and supported retaining the existing warding arrangements for Southfleet and Longfield. It argued that our proposal would result in the interests of Southfleet residents being overwhelmed by those interests of Longfield & New Barn residents. A local councillor objected to our proposal to combine the existing Bean and Darenth wards and supported combining Bean with Betsham village. She asserted that Bean has "very little in common" with Darenth and that the two areas are divided socially and geographically. Three councillors supported retaining the existing Southfleet ward and objected to our proposal to combine the existing Southfleet and Longfield wards. One of the councillors proposed that the existing Longfield ward should be renamed as Longfield & New Barn in order to reflect the two constituent communities.

107 We also received 20 representations from local residents opposing our proposal to combine the existing Longfield and Southfleet wards and supporting the retention of the existing warding arrangements for this area. They argued that our proposals would not reflect community identities in this area; that they would result in the interests of residents of Southfleet being outweighed by those of the more populated area of Longfield & New Barn; and that the rural nature and geographical size of the existing Southfleet ward justified its current level of representation on the Borough Council.

108 Having carefully considered the representations received, we have decided to endorse our draft recommendations for this area, subject to renaming one ward. We note that our proposal to combine Bean and Darenth parishes has received some opposition at Stage Three, although it has also received support. The proposed Bean & Darenth ward would result in improved levels of electoral equality and we consider that the constituent areas of this ward are of a rural character, that they share road links and that their residents share similar interests. We are therefore content to adopt the proposed Bean & Darenth ward as part of our final recommendations.

109 While we appreciate that our proposed Longfield & Southfleet ward has met considerable opposition, we recognise that in the interests of electoral equality it is necessary to combine Southfleet with a neighbouring area as the existing ward does not contain enough electors to merit a whole councillor. Retention of the existing boundaries of Southfleet ward would therefore result in a high level of electoral variance from the borough average. Our proposal avoids warding Southfleet parish, a proposal which received a high degree of opposition at Stage One and Stage Three and which we do not consider would best reflect local community interests and identities. We note that there are strong road links between the existing Longfield and Southfleet wards and that our proposal would address existing anomalies under which rows of houses are divided by the boundary of the existing Longfield ward. Therefore, we are content that our draft recommendation for this area offers the best balance between electoral equality and the statutory criteria and we are content to endorse this arrangement as part of our final recommendations. However, we do consider that there is merit in the proposal of the Conservative Group and a local councillor to acknowledge New Barn in the ward title in order to better reflect the composition of the proposed ward. We therefore propose that our proposed Longfield & Southfleet ward be renamed as Longfield, New Barn & Southfleet. Our final recommendations are illustrated in Figures 1 and 2, on Map 2 and on the large map at the rear of the report.

Electoral Cycle

110 At Stage One we received no proposals in relation to the electoral cycle of the district. Accordingly, we made no recommendation for change to the present system of whole-council elections every four years.

111 At Stage Three, the Conservative Group and a local resident supported retaining the existing cycle of whole-council elections every four years. We are content, therefore, to confirm our draft recommendation as final.

Conclusions

112 Having considered carefully all the representations and evidence received in response to our consultation report, we have decided substantially to endorse our draft recommendations, subject to the following amendments:

- the whole of the Eastern Quarry should be transferred to Greenhithe ward;
- the boundary between Heath, Princes and Wilmington wards should be amended to use the A2 road;

- properties on Rowhill Road should be transferred from Joydens Wood to Wilmington ward;
- the boundary between Littlebrook and Newtown wards should be amended to use the length of the Dartford Tunnel approach road;
- Longfield & Southfleet ward should be renamed Longfield, New Barn & Southfleet.

113 We conclude that, in Dartford:

- there should be a reduction in council size from 47 to 44;
- there should be 17 wards, six fewer than at present;
- the boundaries of 22 of the existing wards should be modified;
- the Council should continue to hold whole-council elections every four years.

114 Figure 4 shows the impact of our final recommendations on electoral equality, comparing them with the current arrangements, based on 2000 and 2005 electorate figures.

Figure 4: Comparison of Current and Recommended Electoral Arrangements

	2000 electorate		2005 forecast electorate	
	Current arrangements	Final recommendations	Current arrangements	Final recommendations
Number of councillors	47	44	47	44
Number of wards	23	17	23	17
Average number of electors per councillor	1,387	1,481	1,440	1,538
Number of wards with a variance more than 10 per cent from the average	13	5	13	0
Number of wards with a variance more than 20 per cent from the average	5	2	7	0

115 As Figure 4 shows, our recommendations would result in a reduction in the number of wards with an electoral variance of more than 10 per cent from 13 to five, with two wards varying by more than 20 per cent from the borough average. This level of electoral equality would improve further in 2005, with no wards varying by more than 10 per cent from the average. We conclude that our recommendations would best meet the need for electoral equality, having regard to the statutory criteria.

Final Recommendation

Dartford Borough Council should comprise 44 councillors serving 17 wards, as detailed and named in Figures 1 and 2, and illustrated on Map 2 and on the large map inside the back cover. The Council should continue to hold whole-council elections every four years.

Parish and Town Council Electoral Arrangements

116 In undertaking reviews of electoral arrangements, we are required to comply as far as is reasonably practicable with the provisions set out in Schedule 11 to the 1972 Act. The Schedule provides that if a parish is to be divided between different borough wards, it must also be divided into parish wards, so that each parish ward lies wholly within a single ward of the borough. Accordingly, in our draft recommendations report we proposed consequential changes to the warding arrangements for Darenth, Stone and Wilmington parishes to reflect the proposed borough wards.

117 The parish of Darenth is currently served by 12 councillors representing four wards: Green Street Green, Ladywood, Lane End and The Downs. The four wards currently return one, four, four and three parish councillors respectively. At Stage One, the Conservative Group proposed that the existing The Downs parish ward should be divided into two new parish wards in line with the proposed boundary between the borough wards of Brent and Darenth. It proposed that the part of the existing The Downs parish ward to be included in the proposed Brent borough ward should be named Fleetdown, while that part that is to remain in Darenth ward should be named Darenth Park ward. It proposed that the existing boundary between Ladywood and Lane End parish wards should be amended in order to reflect new housing development in the area. It proposed that the boundary should be redrawn in order to include the whole of Bennett Way and Moss Way in Lane End parish ward. It stated that there was local concern regarding the existing size of the parish council and proposed that the size should be reduced to seven members, with Green Street Green, Fleetdown and Darenth Park parish wards each returning a single councillor, and Ladywood and Lane End parish wards each returning two councillors.

118 In compiling our draft recommendations we considered that, as a consequence of borough warding proposals, The Downs parish ward should be divided into two new parish wards, as proposed by the Conservative Group. We considered that the name Darenth Park would best represent that part of The Downs parish ward that is to be included in the proposed Bean & Darenth borough ward, given that this area includes Darenth Park Hospital. We also proposed that the part of the existing The Downs parish ward to be included in the proposed Brent borough ward should be named Fleet Downs to reflect the area contained within the ward. We recognised that the Conservative Group proposed that this ward should be named Fleetdown after the Fleetdown Estate, but we considered that the name Fleet Downs would best reflect the whole area, rather than the Fleetdown Estate alone. We supported the Conservative Group's proposal to amend the boundary between Ladywood and Lane End parish wards in order to clarify the boundary in line with recent housing development. We also supported retaining the existing boundaries of Green Street Green ward.

119 We did not endorse the Conservative Group’s Stage One proposal to reduce the size of Darenth Parish Council given that the Parish Council had not supported this proposal and we had no evidence that a reduction in council size would receive local support. In line with its proportion of the electorate of the existing The Downs ward, we proposed that the proposed Fleet Downs parish ward should be represented by two councillors, while Darenth Park parish ward should be represented by a single councillor. Because the changes to the boundaries of Ladywood and Lane End parish wards would have a minimal effect on the existing arrangements, we therefore did not propose changing their levels of representation on the Parish Council.

120 In response to our consultation report, the Borough Council proposed that the proposed Fleet Downs parish ward should be represented by one councillor, while Darenth Park parish ward should be represented by two councillors in order to reflect better the proportion of the projected electorates within the parish. The Conservative Group supported this proposal. Otherwise it supported the remainder of our proposals for Darenth parish.

121 Having considered the representations received, and given that we are confirming our proposed borough wards in this area, we are content to confirm our draft recommendations for warding the parish of Darenth. However, in the light of further evidence, we have reviewed the allocation of parish councillors throughout the parish and we concur with the proposal of the Borough Council and the Conservative Group that Darenth Park parish ward should be represented by two councillors while Fleet Downs parish ward should be represented by a single councillor.

Final Recommendation
Darenth Parish Council should comprise 12 councillors, as at present, representing five wards: Fleet Downs and Green Street Green (each returning a single councillor), Darenth Park (returning two councillors) and Ladywood and Lane End (each returning four councillors). The parish ward boundaries of Darenth Park and Fleet Downs should reflect the proposed borough ward boundaries in the area, as illustrated on the large map at the back of the report.

122 The parish of Stone is currently served by 11 councillors representing four wards: East, Horns Cross, Milestone and St Johns. The four wards currently return four, two, two and three parish councillors respectively. At Stage One, the Conservative Group proposed that the Stone Castle area, to be included in its proposed Greenhithe borough ward, should form a new Castle parish ward, while the remainder of the existing East parish ward should form a new St Mary’s parish ward. It suggested that those parts of the existing Milestone and St Johns parish wards to be included in its proposed Newtown & Milestone borough ward should form a new Milestone parish ward, while the remaining area should form a new St Johns parish ward. It drew attention to the existing boundary between East and Milestone parish wards, which is not tied to ground detail and divides the Crossways Business Park; it proposed using Cotton Lane as the boundary between its proposed St Johns and St Mary’s parish wards. It proposed that the size of the council should be increased to 12 members in order to allow for the “considerable increase in electorate” in the proposed Castle ward. It suggested that the proposed Castle and St Johns parish wards

should each be represented by three councillors, while Horns Cross, Milestone and St Mary's parish wards should each be represented by two councillors.

123 A local councillor proposed that a two-member Stone Castle parish ward should be created in line with his borough ward proposals. He also proposed that the number of councillors representing East parish ward should be reduced from four to three, while the number of councillors representing St Johns parish ward should be reduced from three to two.

124 Having adopted the officers' proposals for this area at borough level as our draft recommendations we were required to make consequential parish warding arrangements which meant that we were unable to adopt the Conservative Group's or local councillor's proposals in their entirety. However, both the Conservative Group and the local councillor proposed that the Stone Castle area should form a new Castle parish ward, and we concurred with that view. We proposed therefore that the part of the existing East parish ward to be included in the proposed Castle borough ward should form a new Castle parish ward. We also proposed that the eastern boundary of the existing Horns Cross parish ward should be amended in line with the proposed boundary between the proposed Castle and Stone borough wards. We supported the Conservative Group's proposal that the part of Stone parish to be included in the proposed Newtown borough ward should form a new Milestone parish ward and that the western boundary of St Johns parish ward should be amended accordingly. We also agreed that the northern boundary of St Johns parish ward should be amended in order to tie it to identifiable ground detail; on the advice of the Ordnance Survey we proposed that Cotton Lane and field edges should form the boundary between St Johns and East parish wards. We noted that the Conservative Group proposed that the remainder of East parish ward should form a new St Mary's parish ward, but we did not receive local support for this name at Stage One.

125 While Stone Parish Council did not comment on its electoral arrangements at Stage One, a parish councillor suggested changes to the representation of the parish wards. We were therefore persuaded to adopt the Conservative Group's proposal that the representation of parish wards should be amended in order to reflect significant changes in the electorate of the parish. As a result, we proposed that the size of Stone Parish Council should be increased to 12 members, with the proposed East, Horns Cross and Milestone parish wards each returning two councillors, while the proposed Castle and St Johns parish wards would each return three councillors.

126 In response to our consultation report, the Borough Council proposed that East parish ward of Stone parish should be named St Mary's after the historic church of St Mary's that forms a local landmark in this area. The Conservative Group supported this proposal, arguing that East is an inappropriate name for the proposed ward given that the ward covers the northern part of the parish, and that the historic parish church of St Mary's is central to this area. The Conservative Group noted that, should their proposals for boundary changes between Newtown and Stone borough wards be accepted, the parish ward boundary between Milestone and St Johns parish wards should be amended. Horns Cross & Stone Village Residents' Association objected to East parish ward being renamed as St Mary's. It argued that it should be renamed Stone Village in order to acknowledge the village's position in this ward. A local councillor proposed reducing the number of parish councillors representing St Johns parish ward by one, to two, in order to reflect the proportion of the parish electorate within this ward. He also proposed that East

parish ward should be renamed Stone Village, asserting that this is the historical name of this area.

127 Having considered all the evidence received, and in light of the confirmation of our proposed borough wards in the area, we confirm our draft recommendations for warding Stone parish as final. As we have not proposed adopting the Conservative Group’s borough warding amendments as our final recommendations, we are not proposing to endorse their proposed parish ward changes. We have not been persuaded to reduce the number of parish councillors representing St Johns parish ward, given that this proposal did not receive local support, unlike our draft recommendations. However, we have been persuaded to change the name of the proposed East ward, given that this ward covers the northern area of the parish. While we consider that the name of St Mary’s has merit, given that the church is central to the ward, we consider that it would best reflect this area to acknowledge Stone Village’s position in this parish ward. We propose, therefore, that the proposed East parish ward should be renamed Stone Village.

Final Recommendation
Stone Parish Council should comprise 12 councillors, one more than at present, representing five wards: Horns Cross, Milestone and Stone Village (each returning two councillors) and Castle and St Johns (each returning three councillors). The parish ward boundaries of Castle, Horns Cross, Milestone, St Johns and Stone Village should reflect the proposed borough ward boundaries in the area, as illustrated on the large map at the back of the report.

128 The parish of Swanscombe & Greenhithe is currently served by 17 councillors representing four wards: Galley Hill, Greenhithe, Knockhall and Swanscombe. The four wards currently return five, two, five and five councillors respectively. At Stage One, the Conservative Group proposed changes to the parish ward boundaries of Swanscombe & Greenhithe Town Council in line with its proposed borough ward boundaries. However, given that we did not receive any further support for changes to the Town Council’s arrangements at Stage One, and our draft recommendations did not result in consequential changes to the parish arrangements, we were not persuaded to propose changes to the warding of the Town Council.

129 At Stage Three, the Conservative Group argued that the allocation of town councillors between the parish wards of Swanscombe & Greenhithe should be amended in order to address electoral imbalances resulting from recent development in the parish. It proposed that each of the four parish wards should be represented by five members, and that the size of the whole parish council should be increased from 17 to 20 members in order to allow for an increase in the number of councillors representing Greenhithe parish ward from two to five councillors. It also proposed consequential re-warding of Knockhall and Swanscombe parish wards in line with its proposed boundary change between the borough wards of Greenhithe and Swanscombe.

130 As a result of our proposal to amend the boundary between Greenhithe and Swanscombe borough wards, we support the Conservative Group’s proposed consequential re-drawing of the

existing Knockhall and Swanscombe parish ward boundaries to reflect the borough ward boundaries. Having reviewed the parish council’s electoral arrangements in the light of representations received, we consider that there is merit in the Conservative Group’s proposal to address projected inequalities of representation within the parish. Given proposed development in Greenhithe parish ward in the next five years, we consider that the number of councillors serving Greenhithe parish ward should be increased from two to five and that the size of the parish council should be increased by three councillors accordingly.

Final Recommendation
Swanscombe & Greenhithe Town Council should comprise 20 councillors, three more than at present, representing four wards: Galley Hill, Greenhithe, Knockhall and Swanscombe (each returning five councillors). The parish ward boundaries should reflect the proposed borough ward boundaries in the area, as illustrated on the large map at the back of the report.

131 The parish of Wilmington is currently served by nine councillors representing four wards: Barn End, Birchwood, Church Hill and Leyton Cross. The four wards currently return three, three, two and one councillor respectively. At Stage One, the Conservative Group proposed that the existing Church Hill ward should be divided into two new wards in line with its proposed borough ward boundaries. That part to be included in the proposed Princes borough ward would form a new Hawley Road parish ward, while that part to be included in the proposed Wilmington borough ward would form a new Church Hill parish ward. It also proposed amending the boundary between Barn End and Birchwood parish wards to address an existing anomaly. Wilmington Parish Council proposed that “for reasons of consistency and logistics”, and to avoid confusing the electorate, the parish ward boundaries should be the same as the borough ward boundaries.

132 Given that we decided to adopt the officers’ proposals for the borough ward boundaries as our draft recommendations for Wilmington, we adopted their proposed consequential parish warding in line with these borough ward boundaries. In the light of this, we were unable to adopt the proposals of the Conservative Group as part of our draft recommendations. According to the wishes of the Parish Council, we proposed creating three new parish wards of Birchwood, Central and Oakfield in line with the proposed Joydens Wood, Wilmington and Princes borough wards respectively. We considered that the existing name of Birchwood adequately reflects the existing parish ward, which is almost identical to that part of Wilmington parish to be included in the proposed Joydens Wood parish ward. The central part of Wilmington parish would be included in the proposed Central ward, so that this ward name seemed appropriate. The proposed Oakfield parish ward includes the majority of the existing Oakfield polling district, so that we considered that this name would reflect the community identity of this area. In line with their proportion of the parish electorate, we proposed that Birchwood ward should return three councillors, Central should return five and Oakfield should return one.

133 In response to our consultation report, the Conservative Group supported our proposals for the parish warding of Wilmington which it considered would “reflect accurately the community

ties and links in the parish” and would clarify the confusion between non-coterminous parish and borough wards. It proposed that if the Commission supported its proposal to transfer part of Rowhill Road from Joydens Wood to Wilmington ward, the boundary between the proposed Birchwood and Central parish wards should be amended accordingly. It also proposed that the Oakfield parish ward should be renamed Orange Tree or Hawley Road. It argued that parts of Oakfield Lane lie outside the parish, so that the proposed name would be inappropriate, while the Orange Tree retail area, at the junction of Oakfield Lane and Lowfield Street towards the centre of this parish ward, is a focus for this community. It proposed that the parish ward should be renamed Orange Tree after this shopping area. It also suggested that the ward might be named Hawley Road after the road that runs through the length of the parish ward.

134 At Stage Three Wilmington Parish Council argued that it would prefer smaller parish wards. It also supported retaining a separate Leyton Cross ward and suggested dividing the existing Central and East parish wards into smaller divisions. However, it did not put forward specific boundary proposals.

135 Having considered all the evidence received, and in light of the fact that we are largely confirming our proposed borough wards in the area, we are content to confirm our draft recommendations for warding Wilmington parish as final, subject to minor amendments. As a result of our proposal to amend the boundary between the borough wards of Joydens Wood and Wilmington, we propose the consequential amendment of the boundary between the proposed Birchwood and Central parish wards. While we note that Wilmington Parish Council stated a preference for smaller parish wards, we recognise that at Stage One the Parish Council proposed that its parish ward boundaries should be coterminous with borough ward boundaries, as under our draft recommendations. Also, the Parish Council has not proposed detailed alternative parish ward boundaries at Stage Three. We also recognise that the Conservative Group supported our proposed parish ward boundaries. As a result, we are content to endorse our draft recommendations as final, subject to the stated boundary amendment. We consider that the Conservative Group’s proposal to rename the proposed Oakfield parish ward has merit, given that the Oakfield road and existing Oakfield polling district extend beyond the proposed parish ward boundaries. We consider that the proposal to rename the ward Orange Tree would better reflect this area, given that the Orange Tree shopping area and public house seem to form the focus of the community in this area. We propose renaming the proposed Oakfield parish ward accordingly.

Final Recommendation
Wilmington Parish Council should comprise nine parish councillors, as at present, representing three wards: Birchwood (returning three councillors), Central (returning five councillors) and Orange Tree (returning one councillor). The parish boundaries should reflect the proposed borough ward boundaries, as illustrated on the large map at the back of the report.

136 In our draft recommendations report we proposed that there should be no change to the electoral cycle of parish councils in the borough, and we are confirming this as final.

Final Recommendation

For parish councils, whole-council elections should continue to take place every four years, on the same cycle as that of the Borough Council.

Map 2: The Commission's Final Recommendations for Dartford

6 NEXT STEPS

137 Having completed our review of electoral arrangements in Dartford and submitted our final recommendations to the Secretary of State, we have fulfilled our statutory obligation under the Local Government Act 1992.

138 It now falls to the Secretary of State to decide whether to give effect to our recommendations, with or without modification, and to implement them by means of an Order. Such an Order will not be made before 19 June 2001.

139 All further correspondence concerning our recommendations and the matters discussed in this report should be addressed to:

The Secretary of State
Department of the Environment, Transport and the Regions
Local Government Sponsorship Division
Eland House
Bressenden Place
London SW1E 5DU

APPENDIX A

Draft Recommendations for Dartford

Our final recommendations, detailed in Figures 1 and 2, differ from those we put forward as draft recommendations in respect of only nine wards, where our draft proposals are set out below.

Figure A1: The Commission's Draft Recommendations: Constituent Areas

Ward name	Constituent areas
Greenhithe	<i>Unchanged:</i> Greenhithe ward (Greenhithe and Knockhall parish wards of Swanscombe & Greenhithe parish)
Heath	Heath ward; Miskin ward (part); Princes ward (part); Wilmington Central ward (part)
Joydens Wood	Maypole ward; Wilmington West ward (part – the proposed Birchwood parish ward of Wilmington parish)
Littlebrook	Joyce Green ward (part); Littlebrook ward; Stone ward (part)
Longfield & Southfleet	Longfield ward (Longfield & New Barn parish); Southfleet ward (Southfleet parish)
Newtown	Newtown ward; Stone ward (part – the proposed Milestone parish ward of Stone parish)
Princes	Princes ward (part); Wilmington East ward (part – the proposed Oakfield parish ward of Wilmington parish)
Swanscombe	Galley Hill and Swanscombe wards (Galley Hill and Swanscombe parish wards of Swanscombe & Greenhithe parish)
Wilmington	Wilmington Central, Wilmington East and Wilmington West wards (part – the proposed Central parish ward of Wilmington parish)

Figure A2: The Commission's Draft Recommendations: Number of Councillors and Electors by Ward

Ward name	Number of councillors	Electorate (2000)	Number of electors per councillor	Variance from average (%)	Electorate (2005)	Number of electors per councillor	Variance from average (%)
4 Greenhithe	3	3,109	1,036	-30	4,600	1,533	0
5 Heath	3	4,844	1,615	9	4,540	1,513	-2
7 Joydens Wood	3	4,510	1,503	2	4,960	1,653	7
8 Littlebrook	2	3,138	1,569	6	2,970	1,485	-3

	Ward name	Number of councillors	Electorate (2000)	Number of electors per councillor	Variance from average (%)	Electorate (2005)	Number of electors per councillor	Variance from average (%)
9	Longfield & Southfleet	3	5,085	1,695	14	4,930	1,643	7
10	Newtown	3	5,035	1,678	13	4,890	1,630	6
11	Princes	3	4,703	1,568	6	4,860	1,620	5
14	Swanscombe	3	4,514	1,505	2	4,540	1,513	-2
17	Wilmington	2	3,078	1,539	4	2,950	1,475	-4
	Totals	44	65,168	–	–	67,680	–	–
	Averages	–	–	1,481	–	–	1,538	–

Source: Electorate figures are based on information provided by Dartford Borough Council.

Note: The 'variance from average' column shows by how far, in percentage terms, the number of electors per councillor varies from the average for the borough. The minus symbol (-) denotes a lower than average number of electors. Figures have been rounded to the nearest whole number.

APPENDIX B

Code of Practice on Written Consultation

The Cabinet Office's November 2000 *Code of Practice on Written Consultation*, www.cabinet-office.gov.uk/servicefirst/index/consultation.htm, requires all Government Departments and Agencies to adhere to certain criteria, set out below, on the conduct of public consultations. Non-Departmental Public Bodies, such as the Local Government Commission, are encouraged to follow the Code. The Code of Practice applies to consultation documents published after 1 January 2001, which should reproduce the criteria, give explanations of any departures, and confirm that the criteria have otherwise been followed.

Figure B1: Commission compliance with Code criteria

Criteria	Compliance/departure
Timing of consultation should be built into the planning process for a policy (including legislation) or service from the start, so that it has the best prospect of improving the proposals concerned, and so that sufficient time is left for it at each stage	The Commission complies with this requirement
It should be clear who is being consulted, about what questions, in what timescale and for what purpose	The Commission complies with this requirement
A consultation document should be as simple and concise as possible. It should include a summary, in two pages at most, of the main questions it seeks views on. It should make it as easy as possible for readers to respond, make contact or complain	The Commission complies with this requirement
Documents should be made widely available, with the fullest use of electronic means (though not to the exclusion of others), and effectively drawn to the attention of all interested groups and individuals	The Commission complies with this requirement
Sufficient time should be allowed for considered responses from all groups with an interest. Twelve weeks should be the standard minimum period for a consultation	The Commission consults on draft recommendations for a minimum of eight weeks, but may extend the period if consultations take place over holiday periods
Responses should be carefully and open-mindedly analysed, and the results made widely available, with an account of the views expressed, and reasons for decisions finally taken	The Commission complies with this requirement
Departments should monitor and evaluate consultations, designating a consultation coordinator who will ensure the lessons are disseminated	The Commission complies with this requirement