

Draft recommendations on the
future electoral arrangements for
Bedford in Bedfordshire

February 2001

LOCAL GOVERNMENT COMMISSION FOR ENGLAND

The Local Government Commission for England is an independent body set up by Parliament. Our task is to review and make recommendations to the Government on whether there should be changes to local authorities' electoral arrangements.

Members of the Commission are:

Professor Malcolm Grant (Chairman)
Professor Michael Clarke CBE (Deputy Chairman)
Peter Brokenshire
Kru Desai
Pamela Gordon
Robin Gray
Robert Hughes CBE

Barbara Stephens (Chief Executive)

We are statutorily required to review periodically the electoral arrangements – such as the number of councillors representing electors in each area and the number and boundaries of wards and electoral divisions – of every principal local authority in England. In broad terms our objective is to ensure that the number of electors represented by each councillor in an area is as nearly as possible the same, taking into account local circumstances. We can recommend changes to ward boundaries, and the number of councillors and ward names. We can also make recommendations for change to the electoral arrangements of parish and town councils in the borough.

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A large map illustrating the existing and proposed ward boundaries for Bedford and Kempston is inserted inside the back cover of this report.

SUMMARY

The Commission began a review of the electoral arrangements for Bedford on 25 July 2000.

- **This report summarises the representations we received during the first stage of the review, and makes draft recommendations for change.**

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

- **In 11 of the 27 wards the number of electors represented by each councillor varies by more than 10 per cent from the average for the borough, and six wards vary by more than 20 per cent from the average.**
- **By 2005 this unequal representation is expected to deteriorate, with the number of electors per councillor forecast to vary by more than 10 per cent from the average in 18 wards and by more than 20 per cent in 10 wards.**

Our main draft recommendations for future electoral arrangements (Figures 1 and 2 and paragraphs 126-127 are that:

- **Bedford Borough Council should have 54 councillors, one more than at present;**
- **there should be 26 wards, one fewer than at present;**
- **the boundaries of 21 of the existing wards should be modified, and six wards should retain their existing boundaries;**
- **elections should continue to take place by thirds.**

These draft 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 20 of the proposed 26 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 expected to continue with the number of electors per councillor in 23 wards expected to vary by no more than 10 per cent from the average for the borough by 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 town of Kempston and the parishes of Eastcotts, Kempston Rural and Renhold;**
- **an increase in the number of councillors serving Elstow Parish Council.**

This report sets out our draft recommendations on which comments are invited.

- **We will consult on our draft recommendations for nine weeks from 20 February 2001. Because we take this consultation very seriously, we may move away from our draft recommendations in the light of Stage Three responses. It is therefore important that all interested parties let us have their views and evidence, *whether or not* they agree with our draft recommendations.**
- **After considering local views, we will decide whether to modify our draft recommendations and then make our final recommendations to the Secretary of State for the Environment, Transport and the Regions.**
- **It will then be for the Secretary of State to accept, modify or reject our final recommendations. He will also determine when any changes come into effect.**

You should express your views by writing directly to the Commission at the address below by 23 April 2001:

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Figure 1: The Commission's Draft Recommendations: Summary

	Ward name	Number of councillors	Constituent areas	Map reference
1	Brickhill (in Bedford)	3	Brickhill ward; De Parys ward (part); Putnoe ward (part)	Large map
2	Bromham	3	<i>Unchanged</i> (Biddenham and Bromham parishes)	Large map and map 2
3	Carlton	1	Carlton ward (Carlton & Chellington, Pavenham and Stevington parishes); Felmersham ward (part – Felmersham parish)	Map 2
4	Castle (in Bedford)	3	Castle ward (part); Queen's Park ward (part)	Large map and map 2
5	Cauldwell (in Bedford)	3	Cauldwell ward (part); Kempston East ward (part – East ward of Kempston Town (part))	Large map
6	Clapham	2	Clapham ward (Clapham parish); Felmersham ward (part – Bletsoe, Milton Ernest and Thurleigh parishes)	Map 2
7	De Parys (in Bedford)	2	De Parys ward (part); Newnham ward (part)	Large map and map 2
8	Eastcotts	1	Eastcotts ward (part – Cardington parish and South ward of Eastcotts parish as proposed)	Large map and map 2
9	Goldington (in Bedford)	3	Goldington ward (part); De Parys ward (part); Newnham ward (part); Putnoe ward (part); Renhold ward (part – South West ward of Renhold parish as proposed)	Large map
10	Great Barford	2	Eastcotts ward (part – Cople parish); Great Barford ward (Great Barford and Willington parishes); Renhold ward (part – Ravensden parish and Renhold North ward of Renhold parish as proposed)	Map 2
11	Harpur (in Bedford)	3	Castle ward (part); De Parys ward (part); Harpur ward	Large map
12	Harrold	1	<i>Unchanged</i> (Harrold, Odell, Podington and Wymington parishes)	Map 2
13	Kempston East	2	Cauldwell ward (part); Kempston East ward (part – East ward of Kempston Town (part)); Kempston West ward (part – West ward of Kempston Town (part))	Large map
14	Kempston North	2	Cauldwell ward (part); Kempston West ward (part – West ward of Kempston Town (part))	Large map
15	Kempston South	3	Kempston East ward (part – East ward of Kempston Town (part)); Kempston West ward (part – West ward of Kempston Town (part)); Kempston Rural ward (part – Hardwick ward of Kempston Rural parish as proposed)	Large map and map 2
16	Kingsbrook (in Bedford)	3	Cauldwell ward (part); Eastcotts ward (part – North ward of Eastcotts parish as proposed); Kingsbrook ward (part)	Large map

	Ward name	Number of councillors	Constituent areas	Map reference
17	Newnham (in Bedford)	2	Castle ward (part); Goldington ward (part); Kingsbrook ward (part); Newnham ward (part)	Large map
18	Oakley	1	<i>Unchanged</i> (Oakley parish)	Map 2
19	Putnoe (in Bedford)	3	Goldington ward (part); De Parys ward (part); Putnoe ward (part)	Large map
20	Queen's Park (in Bedford)	2	Queen's Park ward (part)	Large map and map 2
21	Riseley	1	<i>Unchanged</i> (Bolnhurst & Keysoe, Dean & Shelton, Pertenhall, Riseley and Swineshead parishes)	Map 2
22	Roxton	1	Renhold ward (part – Wilden parish); Roxton ward (Colmworth, Little Barford, Little Staughton, Roxton and Staploe)	Map 2
23	Sharnbrook	1	<i>Unchanged</i> (Knotting & Souldrop, Melchbourn & Yielden and Sharnbrook parishes)	Map 2
24	Turvey	1	Kempston Rural ward (part – Rural ward of Kempston Rural parish as proposed, Stagsden and Turvey parishes)	Large map and map 2
25	Wilshamstead	2	Cauldwell ward (part); Wilshamstead ward (Elstow and Wilshamstead parishes)	Large map and map 2
26	Wootton	3	<i>Unchanged</i> (Stewartby and Wootton parishes)	Map 2

Notes: 1 Bedford Town is the only unparished part of the borough and comprises the 10 wards indicated above.

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

Figure 2: The Commission's Draft Recommendations for Bedford

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 Brickhill (in Bedford)	3	6,731	2,244	12	6,352	2,117	1
2 Bromham	3	5,531	1,844	-8	7,005	2,335	11
3 Carlton	1	2,365	2,365	18	2,252	2,252	7
4 Castle (in Bedford)	3	6,152	2,051	2	5,956	1,985	-5
5 Cauldwell (in Bedford)	3	5,497	1,832	-9	6,305	2,102	0
6 Clapham	2	4,121	2,061	3	4,460	2,230	6
7 De Parys (in Bedford)	2	4,132	2,066	3	4,415	2,208	5
8 Eastcotts	1	1,886	1,886	-6	2,209	2,209	5
9 Goldington (in Bedford)	3	6,217	2,072	3	6,110	2,037	-3
10 Great Barford	2	4,139	2,070	3	4,211	2,106	0
11 Harpur (in Bedford)	3	6,281	2,094	4	6,133	2,044	-3
12 Harrold	1	2,129	2,129	6	2,157	2,157	3
13 Kempston East	2	4,325	2,163	8	4,190	2,095	0
14 Kempston North	2	4,072	2,036	1	3,756	1,878	-11
15 Kempston South	3	5,526	1,842	-8	6,243	2,081	-1
16 Kingsbrook (in Bedford)	3	6,274	2,091	4	6,404	2,135	2
17 Newnham (in Bedford)	2	3,959	1,980	-1	3,886	1,943	-8
18 Oakley	1	1,858	1,858	-8	1,801	1,801	-14
19 Putnoe (in Bedford)	3	6,657	2,219	10	6,286	2,095	0
20 Queen's Park (in Bedford)	2	4,721	2,361	18	4,604	2,302	10
21 Riseley	1	2,185	2,185	9	2,105	2,105	0
22 Roxton	1	2,278	2,278	13	2,184	2,184	4

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 Sharnbrook	1	2,111	2,111	5	2,169	2,169	3
24 Turvey	1	2,167	2,167	8	2,170	2,170	3
25 Wilshamstead	2	3,143	1,572	-22	4,340	2,170	3
26 Wootton	3	4,016	1,339	-33	5,737	1,912	-9
Totals	54	108,473	–	–	113,440	–	–
Averages	–	–	2,009	–	–	2,101	–

Source: Electorate figures are based on Bedford Borough Council's submission.

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 draft recommendations on the electoral arrangements for the borough of Bedford in Bedfordshire on which we are now consulting. We are reviewing the three districts in Bedfordshire and the Unitary Authority of Luton 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 is our first review of the electoral arrangements of Bedford. The last such review was undertaken by our predecessor, the Local Government Boundary Commission (LGBC), which reported to the Secretary of State in June 1979 (report No. 342), at which time the area was known as North Bedfordshire. The electoral arrangements of Bedfordshire County Council were last reviewed in January 1984 (Report No. 462). We expect to review the County Council's electoral arrangements in 2002.

3 In undertaking these reviews, we must have 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 (see Appendix B).

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 borough.

5 We also have regard to our *Guidance and Procedural Advice for Local Authorities and Other Interested Parties* (fourth edition published in December 2000). This 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, as far as possible, 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 The review is in four stages (Figure 3).

Figure 3: Stages of the Review

Stage	Description
One	Submission of proposals to the Commission
Two	The Commission’s analysis and deliberation
Three	Publication of draft recommendations and consultation on them
Four	Final deliberation and report to the Secretary of State

10 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, ie 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 wards 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 Order 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 two-tier areas, and our present *Guidance*.

11 Stage One began on 25 July 2000, when we wrote to Bedford Borough Council inviting proposals for future electoral arrangements. We also notified Bedfordshire County Council, Bedfordshire Police, the local authority associations, Bedfordshire Association of Parish Councils, parish and town councils in the borough, the Members of Parliament with constituency interests in the borough, the Members of the European Parliament for the Eastern 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 16 October 2000.

12 At Stage Two we considered all the representations received during Stage One and prepared our draft recommendations.

13 Stage Three began on 20 February 2001 and will end on 23 April 2001. This stage involves publishing the draft recommendations in this report and public consultation on them. **We take this consultation very seriously and it is therefore important that all those interested in the review should let us have their views and evidence, *whether or not they agree with our draft recommendations.***

14 During Stage Four we will reconsider the draft recommendations in the light of the Stage Three consultation, decide whether to move away from them in any areas, and submit final recommendations to the Secretary of State. Interested parties will have a further six weeks to make representations to the Secretary of State. It will then be for him to accept, modify or reject our final recommendations. If the Secretary of State accepts the recommendations, with or without modification, he will make an Order. The Secretary of State will determine when any changes come into effect.

2 CURRENT ELECTORAL ARRANGEMENTS

15 The borough of Bedford lies in the north of Bedfordshire bordering the counties of Northamptonshire and Cambridgeshire in the north, and the district of Mid Bedfordshire and borough of Milton Keynes in the south and south-west. The borough has excellent links with Britain's two main north to south arteries, the M1 and the A1, and also contains the River Great Ouse which runs through the borough. The main urban settlements are Bedford and Kempston, with Kempston in particular being subject to significant development in recent years.

16 The borough contains 43 parishes, ranging in size from an electorate of 13,967 in Kempston Town Council to 28 electors in Little Barford parish, which together comprise approximately 35 per cent of the borough's total electorate.

17 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'.

18 The electorate of the borough is 108,473 (February 2000). The Council presently has 53 members who are elected from 27 wards. The relatively urban Bedford town and Kempston area contains 12 wards and is currently represented by 35 councillors, while the remaining, predominantly rural area is currently represented by 18 councillors. Eleven of the wards are each represented by three councillors, four are represented by two councillors and there are 12 single-member wards. The Council is elected by thirds.

19 Since the last electoral review there has been an increase in the electorate in Bedford borough, with around 24 per cent more electors than two decades ago as a result of new housing developments.

20 At present, each councillor represents an average of 2,047 electors, which the Borough Council forecasts will increase to 2,140 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 11 of the 27 wards varies by more than 10 per cent from the borough average and in six wards by more than 20 per cent. The worst imbalance is in Wilshamstead ward where the councillor represents 52 per cent more electors per councillor than the borough average.

Map 1: Existing Wards in Bedford

Figure 4: 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	Brickhill (in Bedford)	3	5,787	1,929	-6	5,453	1,818	-15
2	Bromham	2	5,531	2,766	35	7,005	3,503	64
3	Carlton	1	1,767	1,767	-14	1,679	1,679	-22
4	Castle (in Bedford)	3	4,651	1,550	-24	4,490	1,497	-30
5	Cauldwell (in Bedford)	3	6,353	2,118	3	7,427	2,476	16
6	Clapham	2	2,803	1,402	-32	3,173	1,587	-26
7	De Parys (in Bedford)	3	5,830	1,943	-5	5,616	1,872	-13
8	Eastcotts	1	2,967	2,967	45	3,279	3,279	53
9	Felmersham	1	1,916	1,916	-6	1,860	1,860	-13
10	Goldington (in Bedford)	3	5,312	1,771	-13	5,383	1,794	-16
11	Great Barford	1	2,011	2,011	-2	2,006	2,006	-6
12	Harpur (in Barford)	3	6,054	2,018	-1	5,919	1,973	-8
13	Harrold	1	2,129	2,129	4	2,157	2,157	1
14	Kempston East	3	7,369	2,456	20	7,032	2,344	10
15	Kempston Rural	1	2,219	2,219	8	2,622	2,622	23
16	Kempston West	3	6,598	2,199	7	6,781	2,260	6
17	Kingsbrook (in Bedford)	3	4,901	1,634	-20	4,783	1,594	-26
18	Newnham (in Bedford)	2	5,209	2,605	27	5,077	2,539	19
19	Oakley	1	1,858	1,858	-9	1,801	1,801	-16
20	Putnoe (in Bedford)	3	5,413	1,804	-12	5,091	1,697	-21
21	Queen's Park (in Bedford)	3	6,455	2,152	5	6,291	2,097	-2
22	Renhold	1	1,976	1,976	-3	2,333	2,333	9

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 Riseley	1	2,185	2,185	7	2,098	2,098	-2
24 Roxton	1	1,944	1,944	-5	1,861	1,861	-13
25 Sharnbrook	1	2,111	2,111	3	2,180	2,180	2
26 Wilshamstead	1	3,108	3,108	52	4,306	4,306	101
27 Wootton	2	4,016	2,008	-2	5,737	2,869	34
Totals	53	108,473	–	–	113,440	–	–
Averages	–	–	2,047	–	–	2,140	–

Source: Electorate figures are based on information provided by Bedford 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 Clapham ward were relatively over-represented by 32 per cent, while electors in Wilshamstead ward were relatively under-represented by 52 per cent. Figures have been rounded to the nearest whole number.

3 REPRESENTATIONS RECEIVED

21 At the start of the review we invited members of the public and other interested parties to write to us giving their views on the future electoral arrangements for Bedford Borough Council and its constituent parish and town councils.

22 During this initial stage of the review, officers from the Commission visited the area and met officers and members from the Borough Council. We are grateful to all concerned for their co-operation and assistance. We received 25 representations during Stage One, including a borough-wide scheme from the Borough Council, all of which may be inspected at the offices of the Borough Council and the Commission.

Bedford Borough Council

23 The Borough Council proposed a council of 54 members, one more than at present, serving 27 wards, as at present. The Council proposed a mixed pattern of one-, two- and three-member wards, with four wards retaining their existing boundaries. Under the Council's proposals, recently developed areas currently located in Eastcotts and Renhold wards would be included in wards in more urban areas of Bedford. It also proposed new Kempston North and Kempston South wards which would include the proposed development site to the east of the Keeley Green area, currently in Kempston Rural ward. The primarily urban Bedford Town and Kempston area would be represented by a total of 34 councillors, rather than 35 as at present. In addition, we also received copies of representations which were received as part of the Council's own consultation exercise.

24 The Borough Council's scheme would result in improved levels of electoral equality for the borough as a whole. Under its proposals, the number of electors per councillor would vary by no more than 10 per cent from the borough average in 20 of the proposed 27 wards. This level of electoral equality is projected to improve further, with 23 wards varying by no more than 10 per cent from the borough average by 2005. The Council's proposals are summarised at Appendix A.

Bedfordshire County Council

25 Bedfordshire County Council noted that several councillors had expressed concerns about the Borough Council's proposals. In particular, Councillor Gershon (Harrold Division) expressed concern that "historic affinities" between parishes would be lost and opposed the Council's proposed Bromham, Clapham, Oakley and Turvey wards. Councillor Gwynne-Jones (Bromham Division) expressed concern that, under the Council's proposals, the rural part of the borough would be relatively under-represented. He put forward a council size of 54, and proposed allocating a total of 21 councillors to the rural area, an increase of three. Councillor Payne (Great Barford & Wilstead Division) supported the Council's proposed Eastcotts, Elstow and Wilshamstead wards.

Bedford and Kempston Conservative Association

26 Bedford & Kempston Conservative Association ('the Conservatives') proposed retaining the existing council size of 53, allocating 33 councillors to the Bedford town and Kempston areas and a total of 20 councillors to the rural part of the borough. They made no representation in relation to the rural part of the borough, but put forward alternative warding arrangements for the Bedford and Kempston areas which were broadly similar to those put forward by the Borough Council. The proposals were based on the creation of two new wards for central Bedford "reflecting the leisure and administrative activities of Bedford and the people who live there". The Conservatives also put forward a new Kempston North ward. Under the Conservatives' proposals the number of electors per councillor in 10 of the proposed 27 wards would vary by more than 10 per cent from the borough average and two wards would vary by more than 20 per cent. This level of electoral equality is projected to improve over the next five years, with 24 wards varying by no more than 10 per cent from the average by 2005. The Conservatives' proposals are summarised at Appendix A.

North East Bedfordshire Conservative Association

27 North East Bedfordshire Conservative Association supported the Conservatives' proposals.

De Parys Liberal Democrats

28 De Parys Liberal Democrats ('the Liberal Democrats') made no representation in relation to the rural part of the borough, but proposed alternative warding arrangements for the northern part of Bedford town, based on a council size of 53. They proposed six three-member wards and under their proposals, 10 of the proposed 27 wards would vary by more than 10 per cent from the borough average and two wards would vary by more than 20 per cent. This level of electoral equality is projected to improve over the next five years with three wards varying by more than 10 per cent from the average by 2005. The Liberal Democrats' proposals are summarised at Appendix A.

Parish and Town Councils

29 We received 12 representations from parish and town councils and their members. Carlton & Chellington Parish Council, Oakley Parish Council, Pavenham Parish Council and Stevington Parish Council objected to the Council's proposed Bromham and Oakley wards, arguing that the proposals for this area would unite a number of diverse communities with little natural affinity. These views were also expressed by Councillor Pendlington (Stevington Parish Council). Ravensden Parish Council opposed the Council's proposed Great Barford ward, arguing that the proposals would create a ward which covers a large geographical area and comprises parishes which are geographically separated by the A421, which bypasses Bedford, and the River Great Ouse. Cople Parish Council expressed similar comments, emphasising that there are no links between the parishes of Cople and Ravensden.

30 Bletsoe Parish Council opposed the Council's proposed Clapham ward, arguing that the parish has little in common with the urban overspill area of Clapham, and proposed retaining the

existing warding arrangements for this area. Little Staughton Parish Council opposed the Council's proposed Roxton ward, arguing that the new ward would cover too large an area to be effectively represented. Kempston Town Council requested that the existing warding arrangements for the town be retained, arguing that the proposed development area, which would be transferred from Kempston Rural ward under the Council's proposals, would be primarily rural in character. Elstow Parish Council expressed support for the Council's proposed Elstow ward.

Other Representations

31 We received a further eight submissions from a local councillor, local residents and Rutland Road Church. Councillor Brandon (Carlton ward), strongly opposed the Council's proposed Bromham and Oakley wards, arguing that Pavenham and Stevington share long-standing community ties, and put forward an alternative proposal based on the inclusion of Felmersham parish in a revised Carlton ward. Six residents of Stevington strongly opposed the Council's proposed Bromham ward, arguing that Stevington has little in common with the more urban area of Bromham. A local resident argued that the more rural areas of the borough should be allowed to retain a degree of over-representation in order to reflect the relative difficulties of representing rural wards. Another local resident argued for a significant reduction in council size to between 37 and 41 and objected to the Council's proposed Castle, Cauldwell and Kingsbrook wards. He also argued that Biddenham parish should be, "aggregated with Bedford for electoral purposes rather than with parishes the other side of the bypass and river". Finally, Rutland Road Church opposed the proposed Queen's Park and Castle wards, arguing that the area to the west of the town centre should remain in Queen's Park ward.

4 ANALYSIS AND DRAFT RECOMMENDATIONS

32 As described earlier, our prime objective in considering the most appropriate electoral arrangements for Bedford 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”.

33 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 next five years. We must also have regard to the desirability of fixing identifiable boundaries and to maintaining local ties.

34 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.

35 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, the objective of electoral equality 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 electoral equality, and then make adjustments to reflect relevant factors, such as community identity and interests. Regard must be had to five-year forecasts of changes in electorates and we would aim to recommend a scheme which provides improved electoral equality over this five-year period.

Electorate Forecasts

36 The Borough Council submitted electorate forecasts for the year 2005, projecting an increase in the electorate of some 5 per cent from 108,473 to 113,440 over the five-year period from 2000 to 2005. It expects most of the growth to be in Wootton ward, although a significant amount is also expected in Bromham, Cauldwell and Wilshamstead wards. The Council has 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. During Stage One, the Council informed us of several significant errors which had occurred during the formulation of their proposals, resulting in modifications to the electorate totals for a number of proposed wards. This meant that the alternative proposals formulated by the Conservatives and the Liberal Democrats were based upon inaccurate information, leading to anomalies between the different sets of figures. A letter has been sent by the Borough Council to the relevant political groups outlining this issue.

37 De Parys Liberal Democrats expressed concern at the Borough Council’s projected decrease of approximately 4 per cent in electorate in the urban area of the borough, arguing that, “this

seems an unlikely scenario.” Oakley Parish Council argued that, given “the relatively youthful age structure of the village and housing land allocated within the village in the borough local plan”, it did not accept that the electorate of the parish would decrease over the five-year period from 2000 to 2005. The Parish Council anticipated that the electorate would in fact increase from 1852 to around 1940, and argued that the existing single-member Oakley ward could therefore be retained. The Borough Council addressed the issues raised by Oakley Parish Council in their Stage One submission, confirming that the Working Group were satisfied with their original projected electorate figures. The Council stated that, “In particular, the Working Group noted that in general, throughout the borough, there was a forecast of reducing population/electorate owing to an increasing propensity for dwellings to be occupied by one person.”

38 We accept that forecasting electorates is an inexact science. Having given consideration to the Borough Council’s figures and the representations received at Stage One, we are content that the Council’s figures represent the best estimates that can reasonably be made at this time. We welcome further evidence on electorate forecasts during Stage Three.

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.

40 Bedford Borough Council presently has 53 members. The Borough Council proposed a council of 54 members which would provide for the allocation of 34 members in the urban area of Bedford town and Kempston and 20 in the remaining rural area. The Conservatives and the Liberal Democrats proposed retaining the existing council size of 53 members, with an allocation of 33 members for the urban area and 20 in the rural area. The Liberal Democrats argued that notwithstanding the introduction of new political management structures in Bedford, any reduction in council size would be impractical given the demanding workload that councillors have to undertake.

41 Bedfordshire County Councillor Gwynne-Jones (Bromham Division) proposed a council size of 54, arguing that it would provide for a more appropriate balance between the rural and urban areas of the borough. A local resident strongly opposed the Council’s proposal to increase council size from 53 and proposed a significant reduction in council size to between 37 and 41. He argued that since the last review of the electoral arrangements in Bedford, a number of significant changes have taken place in the borough which have reduced the need for so many councillors on the Borough Council. In particular, he noted that the Council no longer administers its own housing stock and that urban community councils have provided a further tier of representation in Bedford town itself.

42 While council size is the starting point of any review, we have concluded that the Borough Council’s proposals, which are based on a council size of 54, provide for better electoral equality than proposals based on a council size of 53. We also note that the Council’s proposal for a council size of 54 would provide for an appropriate allocation of councillors between the urban and rural areas of the borough. While we note the concerns expressed by one resident, we have not been persuaded by the evidence provided that such a significant decrease in council size

would provide more convenient and effective local government than the current council size or any of the borough-wide schemes proposed. Moreover, we have received no significant evidence as to the benefits which would accrue from a smaller council size, and we are not minded to put forward such a radical change that has not been subject to consultation and which has not achieved an element of cross-party support.

43 Having considered the size and distribution of the electorate, the geography and other characteristics of the area, together with the representations received, we have concluded that the achievement of electoral equality and the statutory criteria would best be met by a council of 54 members.

Electoral Arrangements

44 In view of the degree of consensus behind large elements of the Borough Council’s proposals, and the consultation exercise which it undertook with interested parties, we are content to base our draft recommendations on the Council’s scheme. We consider that the Council’s scheme would provide a better balance between electoral equality and the statutory criteria than the current arrangements or other schemes submitted at Stage One. However, to improve electoral equality further and having regard to local community identities and interests, we have decided to move away from the Borough Council’s proposals in a number of areas. For borough warding purposes, the following areas, based on existing wards, are considered in turn:

The rural area

- (a) Bromham, Kempston Rural and Wootton wards;
- (b) Carlton, Clapham, Felmersham and Oakley wards;
- (c) Harrold, Riseley and Sharnbrook wards;
- (d) Great Barford, Renhold and Roxton wards;
- (e) Eastcotts and Wilshamstead wards;

The urban area

- (f) Brickhill, De Parys and Putnoe wards;
- (g) Castle, Harpur and Queen’s Park wards;
- (h) Goldington and Newnham wards;
- (i) Cauldwell and Kingsbrook wards;
- (j) Kempston East and Kempston West wards.

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

The Rural Area

Bromham, Kempston Rural and Wootton wards

46 The existing wards of Bromham, Kempston Rural and Wootton are situated in the south-western corner of the borough. Bromham ward is currently represented by two councillors and contains the parishes of Biddenham and Bromham. Kempston Rural ward is currently represented

by a single councillor and contains the parishes of Kempston Rural, Stagsden and Turvey. Wootton ward is currently represented by two councillors and contains the parishes of Stewartby and Wootton. Under existing arrangements all three wards have high levels of electoral inequality, with Bromham and Kempston Rural wards having 35 per cent and 8 per cent more electors per councillor than the borough average respectively (64 per cent and 23 per cent more than the average respectively by 2005). Wootton ward has 2 per cent fewer electors per councillor than the borough average at present, deteriorating to 34 per cent more than the average by 2005.

47 At Stage One, the Borough Council proposed combining Biddenham and Stagsden parishes with Kempston Rural parish, less the proposed development site to the east of Keeley Green, to form a new two-member Biddenham ward. The remaining part of Kempston Rural parish would be incorporated in the urban area of Kempston, as detailed below. Turvey parish would be combined with Carlton & Chellington parish from the existing Carlton ward and Felmersham parish from the existing Felmersham ward to form a new single-member Turvey ward. Bromham parish would be combined with the neighbouring parish of Stevington from the existing Carlton ward to form a new two-member Bromham ward. The Council proposed that the boundaries of the existing Wootton ward should remain unchanged, while increasing its level of representation from two to three members in order to address the high level of under-representation which would occur in five years' time.

48 As part of the Borough Council's own consultation exercise, Bromham Parish Council stated that they "have very little contact with any village other than Biddenham". The parish council stated that it could only support the Council's proposed Bromham ward if Stevington Parish Council also agreed. The Council received a copy of a petition containing 211 signatures from the residents of Stevington parish strongly opposing the amalgamation with Bromham parish in a new Bromham ward.

49 Under the Borough Council's proposals, Bromham and Turvey wards would have 1 per cent and 9 per cent more electors per councillor than the borough average respectively (1 per cent fewer and 1 per cent more than the average respectively by 2005). Biddenham and Wootton wards would have 18 per cent fewer and 33 per cent fewer electors per councillor than the borough average respectively (11 per cent more and 9 per cent fewer than the average respectively by 2005).

50 We received 13 further representations in relation to this area. Bedfordshire County Council noted that Councillor Gershon (Harrold Division) had expressed concerns in relation to the Council's proposals in the west of the borough, arguing that Felmersham parish should remain with its natural neighbouring parishes of Clapham, Bletsoe and Milton Ernest. Councillor Gershon also argued that Pavenham parish shares no affinity with Oakley, and that Stevington parish should remain with Carlton and Pavenham. Councillor Brandon (Carlton Ward), strongly opposed dividing the villages of Pavenham and Stevington between borough wards, arguing that "they have no relation to Oakley and Bromham whatsoever." Councillor Brandon put forward an alternative proposal for a revised Carlton ward, comprising the parishes of Carlton & Chellington, Felmersham, Pavenham and Stevington. Carlton & Chellington Parish Council objected to the inclusion of the parish in the proposed Turvey ward and argued that it would be more appropriate to expand the existing Carlton ward to incorporate Felmersham parish. Stevington Parish Council strongly opposed the Council's proposed Bromham ward, arguing that Bromham is completely

different to Stevington, with the two areas having nothing in common. It requested that Stevington remain part of a rural ward, and proposed an alternative ward comprising Carlton & Chellington, Felmersham, Pavenham and Stevington parishes. Councillor Pendlington (Stevington Parish Council) also expressed opposition to the Council's proposed Bromham ward.

51 Pavenham Parish Council objected to the inclusion of the parish in the Council's proposed Oakley ward, arguing that the two villages are of a different nature and share few community ties. It stated that the considerable expansion of Oakley over the past few years had created a more urbanised village. It also proposed expanding the existing Carlton ward to include Felmersham parish, arguing that both Carlton & Chellington and Pavenham parishes have close links with Felmersham. In addition, opposition was also expressed to the proposed ward name of Oakley.

52 We also received representations from seven local residents opposing the Council's proposed Bromham ward. They argued that Stevington shares no community links with Bromham, which is considered to be "an expanding suburb of Bedford", and that Stevington has more in common with its neighbouring rural villages. Support was expressed for the retention of the existing warding arrangements in this area. Another local resident argued that Biddenham parish should be "aggregated with Bedford for electoral purposes rather than with parishes the other side of the bypass and river".

53 Having considered the representations received at Stage One, we propose putting forward the Council's proposed three-member Wootton ward, which we consider provides for a suitable balance between electoral equality and the statutory criteria. We have not however been persuaded to put forward the Council's proposed Bromham ward. We note the strong opposition expressed in relation to the Council's proposals, and consider that this issue of local community ties should be addressed. We note the views expressed by a number of respondents that Stevington has little affinity with the more urban neighbouring village of Bromham, and we consider that Felmersham parish has similar characteristics to the neighbouring parishes of Carlton & Chellington, Pavenham and Stevington. Based on these conclusions, we propose retaining the existing Bromham ward, and combining Stevington parish with the neighbouring parishes of Carlton & Chellington, Felmersham and Pavenham in a revised single-member Carlton ward. Bromham ward would be represented by three councillors, one more than at present. While we recognise that Bromham ward would have a relatively high level of electoral inequality, we consider that our proposals would provide for the most appropriate balance between electoral equality and community identities and interests in this area. We propose creating a revised single-member Turvey ward, comprising the parishes of Kempston Rural (less the Kempston Hardwick area), Stagsden and Turvey, and retaining the existing Oakley ward, discussed in more detail below. We consider that these proposals provide for a better balance between electoral equality and the statutory criteria than those put forward by the Borough Council.

54 Under our draft recommendations Carlton and Turvey wards would have 18 per cent and 8 per cent more electors per councillor than the borough average respectively (7 per cent and 3 per cent more than the average respectively by 2005). Bromham and Wootton wards would have 8 per cent and 33 per cent fewer electors per councillor than the borough average respectively (11 per cent more and 9 per cent fewer than the average respectively by 2005). The proposed warding

arrangements for Kempston Rural Parish Council are detailed later in the report and illustrated on the large map inserted inside the back cover of this report.

Carlton, Clapham, Felmersham and Oakley wards

55 The existing wards of Carlton, Clapham, Felmersham and Oakley are situated in the central and western part of the borough. Carlton ward is currently represented by a single councillor and contains the parishes of Carlton & Chellington, Pavenham and Stevington. Clapham ward is currently represented by two councillors and is coterminous with Clapham parish. Felmersham ward is currently represented by a single councillor and contains the parishes of Bletsoe, Felmersham, Milton Ernest and Thurleigh. Oakley ward is currently represented by a single councillor and is coterminous with Oakley parish. Under existing arrangements, all four wards have relatively high levels of electoral inequality with Carlton, Clapham, Felmersham and Oakley wards having 14 per cent, 32 per cent, 6 per cent and 9 per cent fewer electors per councillor than the borough average respectively (22 per cent, 26 per cent, 13 per cent and 16 per cent fewer than the average respectively by 2005).

56 At Stage One, the Borough Council proposed combining Carlton & Chellington, Turvey and Felmersham parishes in a new single-member Turvey ward, as detailed above. Stevington parish would be combined with Bromham parish from the existing Bromham ward, in a revised two-member Bromham ward, also detailed above. Under the Council's proposals, the remaining part of Carlton ward, Pavenham parish, would be combined with Oakley parish to form an enlarged single-member Oakley ward. The parishes of Bletsoe, Milton Ernest and Thurleigh, currently in Felmersham ward, would be combined with Clapham parish to form a revised and enlarged two-member Clapham ward. As part of the Council's own consultation exercise, Clapham Parish Council requested that Clapham ward retain two councillors.

57 Under the Borough Council's proposals, Clapham and Oakley wards would have 3 per cent and 21 per cent more electors per councillor than the borough average respectively (6 per cent more and 12 per cent more than the average respectively by 2005).

58 We received a further 11 representations in relation to this area. As detailed above, Bedfordshire County Council (Councillor Gershon), Councillor Brandon, Carlton & Chellington Parish Council, Stevington Parish Council, Stevington Parish Councillor Pendlington and six local residents all opposed the Council's proposed amalgamation of Bromham and Stevington parishes in a proposed Bromham ward. Bletsoe Parish Council opposed the Council's proposed Clapham ward, arguing that the parish has little in common with the "overspill" area of Bedford, and requested that the existing links with other rural parishes be retained. Pavenham Parish Council strongly opposed the Council's proposed Oakley ward, as detailed above, while Oakley Parish Council supported retaining the existing Oakley ward.

59 Having considered the representations received in relation to this area, we propose broadly basing our draft recommendations on the Borough Council's proposals. However, as discussed previously, we concur with the strong views expressed in relation to the Council's proposed Bromham ward and have proposed revised Bromham, Turvey and Carlton wards, as detailed above. We consider that there is some merit in the argument that Pavenham and Oakley should not be combined in a single borough ward. While we note that retaining the existing Oakley ward

would result in a relatively high level of electoral inequality, we consider that Oakley is a much larger settlement than Pavenham, and the two areas share few community ties. We propose instead retaining Pavenham parish within a revised Carlton ward, as detailed above, and retaining the existing Oakley ward. We note the concerns expressed in relation to the Council's proposed Clapham ward. However, the high levels of electoral inequality in this area must be addressed, and we consider that the existing arrangements cannot be retained. We consider that the Council's proposed Clapham ward would provide the most appropriate balance between electoral equality and the statutory criteria in this area, and are content to put it forward as part of our draft recommendations.

60 Under our draft recommendations, Clapham ward would have 3 per cent more electors per councillor than the borough average (6 per cent more by 2005). Oakley ward would have 8 per cent fewer electors per councillor than the average (14 per cent fewer by 2005)

Harrold, Riseley and Sharnbrook wards

61 The existing wards of Harrold, Riseley and Sharnbrook are situated in the north-west of the borough, and all three wards are currently each represented by a single councillor. Harrold ward contains the parishes of Harrold, Odell, Podington and Wymington, while Riseley ward contains the parishes of Bolnhurst & Keysoe, Dean & Shelton, Pertenhall, Riseley and Swineshead. Sharnbrook ward contains the parishes of Knotting & Souldrop, Melchbourn & Yelden and Sharnbrook. At present, Harrold, Riseley and Sharnbrook wards have 4 per cent, 7 per cent and 3 per cent more electors per councillor than the borough average respectively (1 per cent more, 2 per cent fewer and 2 per cent more than the average respectively by 2005).

62 At Stage One, the Borough Council proposed retaining the existing warding arrangements for Harrold, Riseley and Sharnbrook wards without amendment. As part of the Council's own consultation exercise, Bolnhurst & Keysoe Parish Council expressed support for the Council's proposed Riseley ward. Under the Borough Council's proposals, Harrold, Riseley and Sharnbrook wards would have 6 per cent, 9 per cent and 5 per cent more electors per councillor than the borough average respectively (3 per cent more, equal to the average and 3 per cent more than the average respectively by 2005).

63 We received one further representation in relation to this area. Riseley Parish Council requested that the existing single-member Riseley ward be retained.

64 Having considered the representations received in relation to this area we propose endorsing the Borough Council's proposals. The existing arrangements provide for reasonable levels of electoral equality, both now and in 2005, and the Council's proposals would maintain existing community ties. Under our draft recommendations, Harrold, Riseley and Sharnbrook wards would have 6 per cent, 9 per cent and 5 per cent more electors per councillor than the borough average respectively (3 per cent more, equal to the average and 3 per cent more than the average respectively by 2005).

Great Barford, Renhold and Roxton wards

65 The existing wards of Great Barford, Renhold and Roxton are situated in the east of the borough and are each represented by a single councillor. At present, Great Barford ward comprises the parishes of Great Barford and Willington, Renhold ward comprises the parishes of Ravensden, Renhold and Wilden, while Roxton ward contains the five parishes of Colmworth, Little Barford, Little Staughton, Roxton and Staploe. Under the existing arrangements, Great Barford, Renhold and Roxton wards would have 2 per cent, 3 per cent and 5 per cent fewer electors per councillor than the borough average respectively (6 per cent fewer, 9 per cent more and 13 per cent fewer than the borough average respectively by 2005).

66 At Stage One, the Borough Council proposed transferring Wilden parish from Renhold ward to a revised single-member Roxton ward. Ravensden parish and Renhold parish, less the development area to the east of Norse Road, would be combined with the current Great Barford ward and Cople parish, currently in Eastcotts ward, to form a revised two-member Great Barford ward. The remaining part of Renhold parish would be transferred to the urban area of Bedford town, as detailed below. As part of the Council's own consultation exercise, Renhold Parish Council stated that they had "no comment on or objection to" the Council's proposed Great Barford ward. Great Barford Parish Council opposed the Council's proposed Great Barford ward arguing that it would cover a large geographical area resulting in ineffective representation. Support was expressed for the existing warding arrangements.

67 Under the Borough Council's proposals, Great Barford and Roxton wards would have 3 per cent and 13 per cent more electors per councillor than the borough average respectively (equal to the average and 4 per cent more than the average respectively by 2005).

68 We received three further representations in relation to this area. Cople Parish Council opposed the Council's proposed Great Barford ward, arguing that the parishes of Great Barford and Renhold are geographically distinct from Cople and Wilmington parishes and are separated by the River Great Ouse. The parish council stated that the River Great Ouse forms a significant boundary to community links in the east of the borough, and argued that Renhold and Ravensden parishes have stronger ties with parishes to their north. Little Staughton Parish Council expressed concern that the Council's proposed Roxton ward would cover a geographically large area comprising a large number of parishes. Ravensden Parish Council also opposed the Council's proposed Great Barford ward, arguing that the new ward is geographically large and that the parishes to be combined are divided by the A421 Bedford Bypass and the River Great Ouse.

69 Having considered the representations received at Stage One, we propose endorsing the Borough Council's proposals for Great Barford and Roxton wards without amendment. We note the concerns expressed by parishes in relation to community identities in the proposed wards. However, we have considered a number of alternative options for the warding arrangements in this area, and have not been able to provide for a more appropriate balance between electoral equality and the statutory criteria than the Council's proposals. While we accept that the River Great Ouse forms a physical boundary in the east of the borough, we are content that the small rural parishes which would comprise the proposed Great Barford ward share a degree of community interest. We have not been persuaded that Cople is sufficiently separate and distinct

from the remaining parishes of the proposed Great Barford ward to justify retaining Cople within the single-member Eastcotts ward, given the significant inequalities which would result.

70 Under our draft recommendations, Great Barford and Roxton wards would have 3 per cent and 13 per cent more electors per councillor than the borough average respectively (equal to the average and 4 per cent more than the average respectively by 2005). The proposed warding arrangements of Renhold Parish Council are detailed later in the report, and are illustrated on the large map inserted inside the back cover of this report.

Eastcotts and Wilshamstead wards

71 The existing wards of Eastcotts and Wilshamstead are situated in the south-eastern corner of the borough and are each represented by a single councillor. Eastcotts ward contains the parishes of Eastcotts, Cardington and Cople, while Wilshamstead ward contains the parishes of Elstow and Wilshamstead. At present, Eastcotts and Wilshamstead wards have significantly high levels of electoral inequality, containing 45 per cent, and 52 per cent more electors per councillor than the borough average respectively (53 per cent and 101 per cent more than the average respectively by 2005).

72 At Stage One, the Borough Council proposed transferring Cople parish from Eastcotts ward to a new two-member Great Barford ward, as detailed above. Cardington parish and Eastcotts parish, less the area to the north of the A421 Bedford Bypass, would be combined to form a revised single-member Eastcotts ward. The remaining part of Eastcotts parish, comprising Meadowsweet Drive and adjoining residential roads, would be transferred to the urban area of Bedford town, as discussed in more detail below. The Council proposed dividing the existing Wilshamstead ward to form a single-member Elstow ward and a new single-member Wilshamstead ward. It also proposed uniting the Hillesden Avenue area, which is partly in Cauldwell ward at present, within the new Elstow ward. This change would affect approximately 35 electors. As part of the Council's own consultation exercise, Wilshamstead Parish Council expressed support for the Council's proposed single-member Elstow and Wilshamstead wards. Cauldwell & Kingsbrook Urban Community Council (UCC), proposed transferring the part of Elstow parish to the north of West End and Progress Way, comprising Hillesden Avenue and adjacent roads, to a revised Cauldwell ward, arguing that the area forms part of the Bedford urban overspill, rather than a rural parish.

73 Under the Borough Council's proposals Eastcotts, Elstow and Wilshamstead wards would have 6 per cent, 37 per cent and 7 per cent fewer electors per councillor than the borough average respectively (5 per cent more, 7 per cent fewer and 13 per cent more than the average respectively by 2005).

74 We received three further representations in relation to this area. Bedford County Councillor Payne (Great Barford and Wilstead Division) supported the Council's proposed Elstow and Wilshamstead wards, and also expressed support for the proposals to include the Meadowsweet Drive area within the Bedford town area. Elstow Parish Council also expressed support for the Council's proposed Elstow ward, while a local resident expressed support for the proposal to include the Meadowsweet Drive area within the Bedford town area and also proposed uniting the West End and Progress Way area within Cauldwell ward.

75 Having considered the representations received at Stage One, we propose largely endorsing the Borough Council's proposals for this area, subject to one amendment. We have not been persuaded that the Council's proposal to divide the current Wilshamstead ward between two new wards would better reflect local community identities and interests than the existing arrangements. While we note that there is some support for the proposed single-member Elstow and Wilshamstead wards, we do not consider that the two parishes are sufficiently separate and distinct to justify the relatively high levels of electoral inequality which would result from the Council's proposals. We propose a revised two-member Wilshamstead ward, comprising Wilshamstead parish, together with Elstow parish and the Hillesden Avenue area from the adjacent unparished area.

76 We consider that the Borough Council's proposal to transfer the Meadowsweet Drive area from Eastcotts parish to an urban Bedford ward has some merit, and are content to put it forward as part of our draft recommendations. We consider that the A421 Bedford Bypass forms a significant barrier between the Meadowsweet Drive area and the central community area of Eastcotts parish and we consider that the Meadowsweet Drive area forms part of Bedford rather than part of Eastcotts. Similarly, we are content to adopt the proposal to unite the Hillesden Avenue area within the proposed Wilshamstead ward as part of our draft proposals. We have not, however, been persuaded that the proposal to transfer the West End and Progress Way area from Elstow parish to a proposed Cauldwell ward, as proposed by a local resident, would better reflect local community identities and interests than the existing arrangements. Nevertheless, we would welcome further comments on this issue at Stage Three.

77 Under our draft recommendations, Eastcotts and Wilshamstead wards would have 6 per cent and 22 per cent fewer electors per councillor than the borough average respectively (5 per cent and 3 per cent more than the average respectively by 2005). The proposed warding arrangements for Eastcotts Parish Council are detailed later in the report, and are illustrated on the large map inserted inside the back cover of this report.

The Urban Area

Brickhill, De Parys and Putnoe wards

78 The existing wards of Brickhill, De Parys and Putnoe are situated in the north and centre of the unparished town of Bedford. All three wards are each represented by three councillors. Under existing arrangements, Brickhill, De Parys and Putnoe wards have 6 per cent, 5 per cent and 12 per cent fewer electors per councillor than the borough average respectively (15 per cent, 13 per cent and 21 per cent fewer than the average respectively by 2005).

79 At Stage One, the Borough Council proposed an enlarged three-member Brickhill ward, arguing that its proposals "would improve the comprehensiveness of Brickhill in community terms". It proposed retaining the existing boundary between Brickhill and Putnoe ward, and enlarging the ward southwards to include the part of De Parys ward to the north of the cemetery and Bedford Park. The existing western boundary of Brickhill ward, which follows the John Bunyan Trail, would also be retained. The Council proposed a revised two-member De Parys ward which would retain its existing southern boundary and incorporate the De Montfort

University campus in the east, currently situated in Newnham ward. The eastern boundary of the proposed De Parys ward would run to the rear of properties on the north side of Polhill Avenue and Ellis Road until it meets Kimbolton Road. In the west, the boundary of De Parys ward would be amended to follow the rear of properties on the eastern side of Foster Hill Road. Finally, the Council proposed a revised three-member Putnoe ward, comprising the existing Putnoe ward, the part of De Parys ward to the north of Polhill Avenue and Ellis Road, as detailed above, and the part of Goldington ward to the west of Church Lane and north of properties on the north side of Putnoe Street. Finally, properties on the west side of Haylands Way, currently in De Parys and Putnoe wards, would be united within a revised Goldington ward, as detailed below.

80 Under the Borough Council's proposals, the revised Brickhill, De Parys and Putnoe wards would have 8 per cent, 5 per cent and 12 per cent more electors per councillor than the borough average respectively (2 per cent fewer, 7 per cent more and 1 per cent more than the average respectively by 2005).

81 Bedford & Kempston Conservative Association ('the Conservatives') proposed broadly similar warding arrangements to the Borough Council for this area. They proposed a revised three-member Brickhill ward comprising the existing Brickhill ward, the Nursery Gardens and Kimbolton Close area from the existing Putnoe ward, and the part of De Parys ward to the north of the cemetery and Bedford Park, including Ellis Road and part of Kimbolton Road. The Conservatives proposed a revised three-member Putnoe ward comprising the existing Putnoe ward less the Nursery Gardens and Kimbolton Close area, the part of De Parys ward to the north of Polhill Avenue and Ellis Road and the part of Goldington ward to the west of Church Lane and north of Putnoe Street. The Conservatives also proposed uniting both sides of Haylands Way within a revised Goldington ward.

82 The Conservatives proposed radically different warding arrangements to the Borough Council in relation to De Parys ward. They proposed dividing the current De Parys ward to form a new two-member Bedford Park ward, comprising the part of De Parys ward to the west of Kimbolton Road and the part of the existing Harpur ward to the north-east of Clapham Road and Tavistock Road. The remaining part of De Parys ward, including properties on the west side of Kimbolton Road and properties on the north side of Polhill Avenue, would form part of a revised three-member Castle ward, as detailed below. The Conservatives argued that the current De Parys ward covers a large area between the former Texas Instruments site and the Polhill university site, which "forms no urban community". North East Bedfordshire Conservative Association expressed support for the Conservatives' proposals.

83 Under the Conservatives' proposals, the revised Brickhill and Putnoe wards and new Bedford Park ward would have 9 per cent, 7 per cent and 20 per cent more electors per councillor than the borough average respectively (1 per cent fewer, 3 per cent fewer and 14 per cent more than the average respectively by 2005).

84 De Parys Liberal Democrats ('the Liberal Democrats') proposed a revised three-member Brickhill ward, comprising the whole of the existing ward together with the part of Putnoe ward to the north-west of Putnoe Lane and west of Brecon Way. A revised three-member De Parys ward would comprise the existing ward, less Eagle Gardens, Goldcrest Way, Foster Hill Road and the west side of De Parys Avenue, plus the part of the existing Putnoe ward, to the south of

Putnoe Lane and Queen's Drive and the De Montfort University campus currently in Newnham ward. The De Parys Avenue area, Foster Hill Road area, Eagle Gardens and Goldcrest Way would be transferred to a revised three-member Harpur ward, as detailed below. The remaining part of Putnoe ward would be combined with the part of the existing Goldington ward to the north of Queen's Drive, west of Church Lane and north of Needwood Road and Hundson Road to form a revised three-member Putnoe ward.

85 Under the Liberal Democrats' proposals, Brickhill, De Parys and Putnoe wards would have 14 per cent, 2 per cent and 19 per cent more electors per councillor than the borough average respectively (2 per cent more, equal to the average and 6 per cent more than the average respectively by 2005).

86 Having considered the representations received at Stage One, we propose largely basing our draft recommendations for this area on the Borough Council's proposals, subject to three minor amendments. We consider that our proposals would provide for improved levels of electoral equality and would better reflect the identities and interests of the local community. We propose that Ellis Road, Nursery Gardens and Kimbolton Road should be included in the revised Brickhill ward, as proposed by the Conservatives. We have not however been persuaded that the Conservatives' proposals for the remaining part of this area would reflect local community identities and interests. In particular, we consider that the Conservatives' proposed Bedford Park and Castle wards would unite distinct and separate communities either side of Foster Hill Road and Goldington Road respectively, two main arterial roads in the town which we consider form significant community boundaries in this area. Similarly, in relation to the Liberal Democrats' proposals, we note that to the north of the cemetery, their proposed Brickhill ward would unite distinct communities either side of Kimbolton Road. The Liberal Democrats' revised Goldington ward would also breach Goldington Road.

87 Under our draft recommendations, the proposed Brickhill, De Parys and Putnoe wards would contain 12 per cent, 3 per cent and 10 per cent more electors per councillor than the borough average respectively (1 per cent more, 5 per cent more and equal to the borough average respectively by 2005).

Castle, Harpur and Queen's Park wards

88 The existing wards of Castle, Harpur and Queen's Park are situated in the centre of the borough and form part of the unparished town of Bedford. All three wards are currently each represented by three councillors. Under the existing arrangements, Castle and Harpur wards have 24 per cent and 1 per cent fewer electors per councillor than the borough average respectively (30 per cent fewer and 8 per cent fewer than the average respectively by 2005). Queen's Park ward has 5 per cent more electors per councillor than the borough average (2 per cent fewer by 2005).

89 At Stage One, the Borough Council proposed broadly retaining the existing three-member Harpur ward with two minor amendments. It proposed incorporating part of Castle ward to the north of Dame Alice Street and Bromham Road and those properties on the east side of Foster Hill Road (currently in De Parys ward), in a revised Harpur ward. The Council proposed a revised three-member Castle ward comprising the current Castle ward less the area to the north of Dame Alice Street and Bromham Road, and incorporating the part of Queen's Park ward to the east of

the London to Leicester railway line. The eastern boundary would also be modified to follow the rear of properties on the west side of Newnham Avenue. The southern boundary, following the River Great Ouse, would be retained. The remaining part of Queen's Park ward to the west of the London to Leicester railway line would be represented by two councillors, one fewer than at present. As part of the Council's own consultation process, Queen's Park Workers Forum expressed concern in relation to the Council's proposed Queen's Park ward, arguing that the proposal may lead to "loss of identity for the Midland Road area".

90 Under the Borough Council's proposals, Castle, Harpur and Queen's Park wards would have 2 per cent, 4 per cent and 18 per cent more electors per councillor than the borough average respectively (5 per cent fewer, 3 per cent fewer and 10 per cent more than the average respectively by 2005).

91 Bedford & Kempston Conservative Association ('the Conservatives') proposed a revised three-member Castle ward, comprising the part of the existing De Parys ward to the east of Kimbolton Road as detailed above, together with the part of the existing Castle ward to the east of the High Street, less the properties on the east side of Newnham Avenue. Newnham Avenue would form part of a revised two-member Newnham ward, detailed below. The remaining part of Castle ward would be combined with the part of the existing Harpur ward to the south of Clapham Road and Tavistock Road and the part of the existing Queen's Park ward to the east of the London to Leicester railway line to form a new two-member Midland ward. The remaining part of Queen's Park ward to the west of the railway line would form a revised two-member Queen's Park ward, identical to that proposed by the Borough Council. Support for these proposals was expressed by North East Bedfordshire Conservative Association.

92 Under the Conservatives' proposals, Castle, Midland and Queen's Park wards would have 10 per cent, 16 per cent and 15 per cent more electors per councillor than the borough average respectively (2 per cent, 6 per cent and 8 per cent more than the average respectively by 2005).

93 De Parys Liberal Democrats ('the Liberal Democrats') also proposed a revised two-member Queen's Park ward identical to that put forward by the Borough Council and the Conservatives. They proposed a revised three-member Harpur ward comprising the existing ward plus the De Parys Avenue, Foster Hill Road, Eagle Gardens and Goldcrest Way areas from the existing De Parys ward, as detailed above. The Liberal Democrats' proposed three-member Castle ward would comprise the existing ward together with the part of the existing Queen's Park ward to the east of the London to Leicester railway line and those properties on the east side of Newnham Avenue (currently in Newnham ward).

94 Under the Liberal Democrats' proposals, Castle, Harpur and Queen's Park wards would have 5 per cent, 6 per cent and 15 per cent more electors per councillor than the borough average respectively (3 per cent fewer, 4 per cent fewer and 7 per cent more than the average by respectively 2005).

95 Rutland Road Church opposed the proposal to transfer the Midland Road area to the east of the London to Leicester railway line from Queen's Park ward to the neighbouring proposed Castle ward. It argued that this area is an integral part of the Queen's Park community, and that "a number of projects take place across the geographical boundary of the railway line." A local

resident opposed the Council's proposed Castle ward, arguing that "The proposed boundaries for Castle ward do not achieve a Town Centre ward but reflect a desire to gerrymander boundaries for political advantage."

96 Having considered the representations received at Stage One, we propose basing our draft recommendations for this area on the Borough Council's proposals, which we consider would best reflect community ties in the area while providing for improved levels of electoral equality. We have not been persuaded by the Conservatives' proposal to divide the current De Parys ward between their proposed Bedford Park and Castle wards, which we consider would not adequately reflect the identities and interests of the community to the south of Bedford Park. Similarly, we consider that the Conservatives' proposed Midland ward would result in the division of the commercial town centre area. We note that there is broad consensus between the Borough Council and the Liberal Democrats in this area and that all three political parties submitted identical proposals for a revised Queen's Park ward. While we note the concerns expressed locally in relation to the transfer of the Midland Road area from Queen's Park ward to a revised Castle ward, we note that at Stage One this option received cross-party support, and concur with the view that the London to Leicester railway line provides for a strong boundary between the two wards. We propose adopting the Borough Council's proposals for the purpose of our draft recommendations, but would welcome further views in relation to the boundary between the proposed Queen's Park and Castle wards from interested parties at Stage Three.

97 Under our draft recommendations, the proposed Castle, Harpur and Queen's Park wards would have 2 per cent, 4 per cent and 18 per cent more electors per councillor than the borough average respectively (5 per cent fewer, 3 per cent fewer and 10 per cent more than the average respectively by 2005).

Goldington and Newnham wards

98 The existing wards of Goldington and Newnham are situated in the centre of the borough and form part of the unparished town of Bedford. Goldington ward is currently represented by three councillors while Newnham ward is currently represented by two councillors. Under existing arrangements, Goldington ward has 13 per cent fewer electors per councillor than the borough average (16 per cent fewer by 2005), while Newnham ward would have 27 per cent more electors per councillor than the borough average (19 per cent more by 2005).

99 At Stage One, the Borough Council proposed a revised three-member Goldington ward comprising the existing Goldington ward, less the area to the west of Church Lane and north of Putnoe Street, plus the part of Newnham ward to the north of the A428 Goldington Road and the De Montfort University site. This new ward would also incorporate the new residential development to the east of Norse Road, currently located in Renhold ward. The Council argued that this new development, although located in a rural ward, has a more natural geographic relationship with the urban area of Bedford. The remaining part of Newnham ward, including those properties on the north side of Goldington Road, would be combined with those properties on the west side of Newnham Avenue and the Priory Country Park area to the north of the River Great Ouse (currently in Kingsbrook ward), in a revised two-member Newnham ward. The Council argued that, by incorporating the properties on both sides of Newnham Avenue and Goldington Road in the same ward, its proposals brought together existing communities of interest.

100 Under the Borough Council's proposals, the revised Goldington and Newnham wards would have 4 per cent more and 3 per cent fewer electors per councillor than the borough average respectively (2 per cent fewer and 9 per cent fewer than the average respectively by 2005).

101 Bedford & Kempston Conservative Association ('the Conservatives') proposed revised three-member Goldington and two-member Newnham wards similar to those put forward by the Borough Council, subject to minor variations. They proposed that the Pearmain Close and Bury Walk areas form part of the revised Newnham ward, and that the De Montfort University campus site off Polhill Avenue, become part of Goldington ward rather than being transferred to the neighbouring De Parys ward. In addition, they proposed that the boundary between the proposed Putnoe and Goldington wards should follow the rear of properties on the west side of Church Lane. Support for these proposals was expressed by North East Bedfordshire Conservative Association.

102 Under the Conservatives' proposals, Goldington and Newnham wards would have 4 per cent more and 2 per cent fewer electors per councillor than the borough average respectively (5 per cent more and 9 per cent fewer than the average respectively by 2005).

103 De Parys Liberal Democrats ('the Liberal Democrats') proposed a revised three-member Goldington ward comprising the whole of the existing Newnham ward less the De Montfort University campus site and the east side of Newnham Avenue, the part of the existing Goldington ward to the south of Queen's Drive, Needwood Road and Hudson Road, together with the new development area currently located in Renhold ward. The proposed Goldington ward would also include the Priory Country Park area to the north of the River Great Ouse, currently in Kingsbrook ward. Under the Liberal Democrats' proposals, Newnham ward would no longer exist, while Goldington ward would have 8 per cent more electors per councillor than the borough average (4 per cent more by 2005).

104 Having considered the representations received at Stage One, we propose basing our draft recommendations for this area on the Borough Council's proposals, subject to one minor amendment. We propose including Bury Walk and part of the adjacent industrial estate in the revised Newnham ward, as proposed by the Conservatives. We consider that this amendment would provide for improved levels of electoral equality while uniting Bury Walk with Goldington Road from which it is accessed. We consider that the Liberal Democrats' proposed Goldington ward would cover a large geographical area while uniting separate and distinct communities either side of the A428 Goldington Road and we have not been persuaded that their proposals would appropriately reflect local community identities and interests in this area. We consider that the Council's and the Conservatives' proposals would utilise strong boundaries such as the River Great Ouse and Goldington Road and would provide for reasonable levels of electoral equality, both now and in five years' time.

105 Under our draft recommendations, the proposed Goldington and Newnham wards would have 3 per cent more and 1 per cent fewer electors per councillor than the borough average respectively (3 per cent and 8 per cent fewer than the average respectively by 2005). The proposed warding arrangements for Renhold Parish Council are detailed later in the report, and illustrated on the large map inserted inside the back cover of this report.

Cauldwell and Kingsbrook wards

106 The existing wards of Cauldwell and Kingsbrook are situated in the centre of the borough and form part of the unparished town of Bedford. Both wards are currently represented by three councillors. Under existing arrangements, Cauldwell ward has 3 per cent more electors per councillor than the borough average (16 per cent more by 2005), while Kingsbrook ward has 20 per cent fewer electors per councillor than the borough average (26 per cent fewer by 2005).

107 At Stage One, the Borough Council proposed a revised three-member Kingsbrook ward comprising the current Kingsbrook ward less the area to the north of the River Great Ouse, as detailed above, and including the part of Cauldwell ward to the east of the former Bedford to Shefford railway line. In addition, the Council proposed that the new Meadowsweet Drive development, currently situated in Eastcotts ward, be incorporated within the revised Kingsbrook ward, arguing that the development area is directly adjacent to the urban area of Bedford and “is separated by the A421 Bedford Southern Bypass from the rural area”. The remaining part of Cauldwell ward, less the Whitbread Avenue and Stafford Road area, would be combined with the part of Kempston East ward to the east of the London to Leicester railway line, to form a revised three-member Cauldwell ward. The Council also proposed a minor amendment to the southern boundary of Cauldwell ward resulting in the transfer of 35 electors in the north end of Hillesden Avenue to the neighbouring Wilshamstead ward, as detailed above. As part of the Council’s own consultation exercise, Cauldwell and Kingsbrook UCC expressed concern in relation to the Council’s proposal to transfer the Whitbread Avenue area to a proposed Kempston North ward, and objected to the proposed transfer of roads to the west of London Road from Cauldwell ward to Kingsbrook ward. They also argued that the area surrounding Progress Way and West End would be better served in the urban area of Cauldwell rather than in Wilshamstead ward, as detailed above.

108 Under the Borough Council’s proposals, Cauldwell and Kingsbrook wards would have 10 per cent fewer and 5 per cent more electors per councillor than the borough average respectively (2 per cent fewer and 4 per cent more than the average respectively by 2005).

109 Bedford & Kempston Conservative Association (‘the Conservatives’) proposed broadly similar proposals to the Borough Council in relation to the revised three-member Cauldwell and Kingsbrook wards, with two exceptions. They proposed that the St Leonard’s area to the north of Elstow Road should be retained within the revised Cauldwell ward. The Conservatives also proposed retaining the existing western and southern boundaries of Cauldwell ward. Support for these proposals was expressed by North East Bedfordshire Conservative Association.

110 Under the Conservatives’ proposals, Cauldwell and Kingsbrook wards would have 11 per cent fewer and 2 per cent more electors per councillor than the borough average respectively (2 per cent fewer and equal to the average respectively by 2005).

111 We received one further representation in relation to this area. A local resident expressed support for the inclusion of the Meadowsweet Drive development in a revised Kingsbrook ward. While he supported including the area to the west of London Road between Harrowden Road and St John’s Station in Kingsbrook ward, he objected to the inclusion of the St Leonard’s area,

arguing that this area shares more community interest with Cauldwell ward. He also proposed uniting the West End and Progress Way area within Cauldwell ward, as detailed above.

112 Having considered the representations received at Stage One, we propose basing our draft recommendations for this area on the Borough Council's proposals, subject to one modification. We concur with the views expressed by the Conservatives and a local resident that the St Leonard's area should remain part of Cauldwell ward. We consider that this modification would better reflect community ties in the area than the proposals put forward by the Borough Council, and would provide for improved levels of electoral equality. While we note the concerns expressed in relation to the transfer of the Whitbread Avenue area to the proposed Kempston North ward, we concur with the view that the London to Leicester railway line forms a strong boundary between Bedford and Kempston. We also note the concerns expressed in relation to the Progress Way area but consider that this area has better transport and community links with the rural area of Elstow than with the urban area of Cauldwell, as previously discussed. We would, however, welcome further views on both these issues at Stage Three.

113 Under our draft recommendations, the proposed Cauldwell and Kingsbrook wards would have 9 per cent fewer and 4 per cent more electors per councillor than the borough average respectively (equal to the average and 2 per cent more than the average respectively by 2005). The proposed warding arrangements for Eastcotts Parish Council are detailed later in the report, and are illustrated on the large map inserted inside the back cover of this report.

Kempston East and Kempston West wards

114 The existing wards of Kempston East and Kempston West are situated in the centre of the borough, with both wards currently each represented by three councillors. Kempston East ward is coterminous with East ward of Kempston town, while Kempston West ward is coterminous with West ward of Kempston town. Under existing arrangements, Kempston East and Kempston West wards have 20 per cent and 7 per cent more electors per councillor than the borough average respectively (10 per cent more and 6 per cent more than the average respectively by 2005).

115 At Stage One, the Borough Council proposed three wards in this area. A revised two-member Kempston East ward would comprise the part of the current Kempston East ward to the west of the London to Leicester railway line and north of Elstow Road, including those properties on the south side of Elstow Road, together with the part of Kempston West ward to the south of Bedford Road and east of St John's Street and part of the existing Cauldwell ward surrounding the industrial estate. The new two-member Kempston North ward would comprise the part of the existing Kempston West ward to the north of Bedford Road, the High Street and Cemetery Road, and the part of Cauldwell ward to the west of the railway line and north of Bedford Road. The remaining parts of the existing Kempston West and Kempston East wards to the south of Elstow Road and St John's Street would be combined to form a new three-member Kempston South ward. The Council also proposed incorporating part of the existing Kempston Rural ward, to the east of the Keeley Green area, within its proposed Kempston South ward. It noted that, while this area contains few electors at present, it is forecast to contain approximately 400 more electors by 2005, as a result of housing developments which are expected to be completed during the next five years.

116 Under the Borough Council's proposals, Kempston East, Kempston North and Kempston South wards would have 8 per cent more, 1 per cent more and 9 per cent fewer electors per councillor than the borough average respectively (equal to the average, 11 per cent fewer and 2 per cent fewer than the average respectively by 2005).

117 Bedford & Kempston Conservative Association ('the Conservatives') proposed three wards in the Kempston area. They proposed a new two-member Kempston North ward comprising the part of the existing Kempston East ward to the north of Bedford Road and east of Manor Drive, together with part of the existing Kempston East ward bounded by Bunyan Road, Elstow Road and Margetts Road. The remaining part of Kempston East ward would form a revised three-member Kempston East ward, while the remaining part of the existing Kempston West ward, together with the part of Kempston Rural ward to the east of Keeley Green, would form a revised two-member Kempston West ward. Support for these proposals was expressed by North East Bedfordshire Conservative Association.

118 Under the Conservatives' proposals, Kempston East, Kempston North and Kempston West wards would have equal to, 5 per cent more and 14 per cent fewer electors per councillor than the borough average respectively (9 per cent fewer, 5 per cent fewer and equal to the average respectively by 2005).

119 Kempston Town Council expressed support for the existing warding arrangements for the Kempston area, and requested that they be retained. It argued that "historically the area has been divided into two wards due to the original village being in the west and the new development in the east." In addition, they considered that the new development area proposed to be incorporated in the new Kempston South ward would be more rural than urban in nature.

120 Having considered the representations received at Stage One, we propose basing our draft recommendations on the Borough Council's proposals for this area, subject to one amendment. We consider that these proposals utilise strong boundaries in the Kempston area, and would provide for improved levels of electoral equality, while reflecting the identities and interests of the local community. However, we propose an amendment in relation to the Council's proposed Kempston South ward. The Council proposed that a future development area located in Kempston Rural ward be incorporated in a new Kempston South ward. However, the area in question contains no electors at present, and cannot therefore form a parish ward. We therefore propose that a larger area of Kempston Rural parish be combined with Kempston South ward so that the area will contain a sufficient number of electors for a parish ward to be created. We propose that the Kempston Hardwick area of Kempston Rural parish, to the east of Green End Road, Ibbett Close and Wootton Road be incorporated in the new Kempston South ward.

121 While we recognise that under our proposals the proposed Kempston North ward would have a relatively high electoral variance, we consider that strong boundaries in the area such as the River Great Ouse and Bedford Road have, to a certain extent, limited modifications to the boundaries to improve electoral equality. We consider that alternative options proposed in this area would utilise less clearly identifiable boundaries, and would not reflect local community identities and interests. We also note that the proposal to transfer the Keeley Green area to Kempston South ward would provide for an improved level of electoral inequality in the proposed Turvey ward.

122 We also note the concerns expressed by Kempston Town Council. However, based on a council size of 54, the Kempston area is entitled to a total of seven councillors, one more than at present. As our *Guidance* makes clear, we consider that borough wards should not be represented by more than three councillors. As such, we were unable to recommend the retention of the existing arrangements. In relation to the new development area proposed to be incorporated in the town area, we welcome further views on this issue at Stage Three.

123 We consider that the remainder of the Borough Council's proposals utilise strong boundaries and conclude that, on balance, its scheme would better reflect the identities and interests of the local community. Under our draft recommendations, Kempston East, Kempston North and Kempston South wards would have 8 per cent more, 1 per cent more and 8 per cent fewer electors per councillor than the borough average respectively (equal to the average, 11 per cent fewer and 1 per cent fewer than the average respectively by 2005).

Electoral Cycle

124 We received one representation regarding the Borough Council's electoral cycle. De Parys Liberal Democrats proposed retaining the current system of elections by thirds, which would give residents living in three-member wards "the opportunity to have their say on the performance of their councils and councillors each year". In addition, they stated that maintaining the current system of annual elections "helps the process of encouraging people to vote".

125 We have considered the representations received. At present, there appears to be a majority view that the present electoral cycle should be retained, and we therefore propose no change to the current electoral cycle of elections by thirds for the Borough Council.

Conclusions

126 Having considered all the evidence and representations received during the initial stage of the review, we propose that:

- there should be an increase in council size from 53 to 54;
- there should be 26 wards, one fewer than at present;
- the boundaries of 21 of the existing wards should be modified;
- elections should continue to be held by thirds.

127 As already indicated, we have based our draft recommendations on the Borough Council's proposals but propose to depart from them in the following areas:

- We propose retaining the existing warding arrangements for Bromham and Oakley wards, together with revised Carlton, Turvey and Wilshamstead wards;

- We propose that Nursery Gardens and Kimbolton Close should form part of the proposed Brickhill ward, as proposed by the Conservatives;
- We propose that Ellis Road and part of Kimbolton Road should form part of the proposed Brickhill ward, as proposed by the Conservatives;
- We propose that Bury Walk and part of the adjoining industrial estate should form part of the proposed Newnham ward, as proposed by the Conservatives;
- We propose that the St Leonard's Road area should remain part of Cauldwell ward, as proposed by the Conservatives;
- We propose an amendment to the boundary between the proposed Kempston South and Turvey wards.

128 Figure 5 shows the impact of our draft recommendations on electoral equality, comparing them with the current arrangements, based on 2000 electorate figures and with forecast electorates for the year 2005.

Figure 5: Comparison of Current and Recommended Electoral Arrangements

	2000 electorate		2005 forecast electorate	
	Current arrangements	Draft recommendations	Current arrangements	Draft recommendations
Number of councillors	53	54	53	54
Number of wards	27	26	27	26
Average number of electors per councillor	2,047	2,009	2,140	2,101
Number of wards with a variance more than 10 per cent from the average	11	6	18	3
Number of wards with a variance more than 20 per cent from the average	6	2	10	0

129 As shown in Figure 5, our draft recommendations for Bedford Borough Council would result in a reduction in the number of wards varying by more than 10 per cent from the borough average from 11 to six. By 2005 only three wards are forecast to vary by more than 10 per cent from the average for the borough.

Draft Recommendation

Bedford Borough Council should comprise 54 councillors serving 26 wards, as detailed and named in Figures 1 and 2, and illustrated on Map 2 and on the large map inside the back cover of this report. The Council should continue to hold elections by thirds.

Parish and Town Council Electoral Arrangements

130 In undertaking reviews of electoral arrangements, we are required to comply as far as possible 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, we propose consequential warding arrangements for the parishes of Eastcotts, Kempston Rural and Renhold and the town of Kempston to reflect the proposed borough wards. At the request of Elstow Parish Council we also propose amendments to the number of councillors representing the parish.

131 The parish of Eastcotts is currently served by 15 councillors and is not warded. For borough warding purposes, we propose adopting the Borough Council's proposal to incorporate the new development area surrounding Meadowsweet Drive in a revised Kingsbrook ward, with the remainder of the parish forming part of a revised Eastcotts ward. The Borough Council proposed that the part of Eastcotts parish to be transferred to Kingsbrook ward should be named North ward and should return four councillors, while the remaining part of the parish should be named South ward and should return 15 councillors. For the purpose of consultation we are content to put forward the Council's proposals for this area.

Draft Recommendation

Eastcotts Parish Council should comprise 19 councillors, four more than at present, representing two wards: North ward (returning four councillors) and South ward (returning 15 councillors). The parish ward boundaries should reflect the proposed borough ward boundaries in the area, as illustrated and named on the large map at the back of the report.

132 The parish of Kempston Rural is currently served by 13 councillors and is not warded. For borough warding purposes, we propose that the Kempston Hardwick area of the parish form part of a new Kempston South ward, with the remainder of the parish forming part of a new Turvey ward. In order to reflect the proposed borough wards, we propose consequential warding arrangements for Kempston Rural Parish Council. We propose that the area transferred to Kempston South ward should be named Hardwick ward and should return four councillors, while the remaining part of the parish should be named Rural ward and should return nine councillors.

Draft Recommendation

Kempston Rural Parish Council should comprise 13 councillors, as at present, representing two wards: Hardwick ward (returning four councillors) and Rural ward (returning nine councillors). The boundary between the two parish wards should reflect the proposed borough ward boundary, as illustrated and named on the large map at the back of this report.

133 The parish of Renhold is currently represented by nine councillors and is not warded. For borough warding purposes, we propose adopting the Borough Council's proposal to transfer the development area to the east of Norse Road to a revised Goldington ward. The Borough Council proposed that the part of Renhold parish to be transferred to Goldington ward should be named South West ward and return four councillors, while the remaining part of the parish should be named Renhold North ward and should return nine councillors. For the purpose of consultation we are content to put forward the Council's proposals for this area.

Draft Recommendation

Renhold Parish Council should comprise 13 councillors, four more than at present, representing two wards: South West ward (returning four councillors) and Renhold North ward (returning nine councillors). The boundary between the two parish wards should reflect the proposed borough ward boundary, as illustrated and named on the large map at the back of this report.

134 Kempston Town Council is currently served by 12 councillors representing two wards, East and West, each returning six councillors. For borough warding purposes, we propose adopting the Borough Council's proposed Kempston East, Kempston North and Kempston South wards. We also propose transferring part of Kempston East ward to a revised Cauldwell ward. As a result, we propose consequential warding arrangements for Kempston Town Council, with the creation of four new parish wards. We propose that the part of Kempston transferred to a revised Cauldwell ward should be named East ward and should return one councillor. The area coterminous with Kempston East ward should be named Central ward and should return three councillors. The area coterminous with Kempston North ward should be named North ward and should return three councillors. The area which forms part of Kempston South ward should be named South ward and should return five councillors.

Draft Recommendation

Kempston Town Council should comprise 12 councillors, as at present, representing four wards: Central ward (returning three councillors), East ward (returning one councillor), North ward (returning three councillors) and South ward (returning five councillors). The boundary between the four parish wards should reflect the proposed borough ward boundaries, as illustrated and named on the large map at the back of this report.

135 Elstow Parish Council is currently represented by seven councillors and is not warded. During Stage One, the parish requested that its level of representation be increased from seven to nine councillors, in order to reflect the increase in its electorate. We are content to put forward the Parish Council's proposal for the purpose of consultation, and would welcome further views at Stage Three.

Draft Recommendation

Elstow Parish Council should comprise nine parish councillors, two more than at present.

136 We are not proposing any change to the electoral cycle of parish and town councils in the borough.

Draft Recommendation

For parish and town councils, elections should continue to be held at the same time as elections for the principal authority.

137 We have not finalised our conclusions on the electoral arrangements for Bedford and welcome comments from the Borough Council and others relating to the proposed ward boundaries, number of councillors, electoral cycle, ward names, and parish and town council electoral arrangements. We will consider all the evidence submitted to us during the consultation period before preparing our final recommendations.

Map 2: The Commission’s Draft Recommendations for Bedford

5 NEXT STEPS

138 We are putting forward draft recommendations on future electoral arrangements for consultation. We will take fully into account all representations received by 23 April 2001. Representations received after this date may not be taken into account. All representations will be available for public inspection by appointment at the offices of the Commission and the Borough Council, and a list of respondents will be available on request from the Commission after the end of the consultation period.

139 Views may be expressed by writing directly to us:

Review Manager
Bedford Review
Local Government Commission for England
Dolphyn Court
10/11 Great Turnstile
London WC1V 7JU

Fax: 020 7404 6142

E-mail: reviews@lgce.gov.uk

Website: www.lgce.gov.uk

140 In the light of representations received, we will review our draft recommendations to consider whether they should be altered. As indicated earlier, it is therefore important that all interested parties let us have their views and evidence, *whether or not* they agree with our draft recommendations. We will then submit our final recommendations to the Secretary of State for the Environment, Transport and the Regions. After the publication of our final recommendations, all further correspondence should be sent to the Secretary of State, who cannot make an Order giving effect to our recommendations until six weeks after he receives them.

APPENDIX A

Bedford Borough Council's Proposed Electoral Arrangements

Our draft recommendations, detailed in Figures 1 and 2, are based on the Borough Council's proposals, together with minor modifications based on proposals put forward by the Conservatives and some of our own proposals. Details of the three alternative proposals submitted at Stage One are as follows:

Figure A1: Bedford Borough Council's Proposals: 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 %
1 Biddenham	2	3,281	1,641	-18	4,650	2,325	11
2 Brickhill	3	6,533	2,178	8	6,164	2,055	-2
3 Bromham	2	4,076	2,038	1	4,166	2,083	-1
4 Castle	3	6,152	2,051	2	5,956	1,985	-5
5 Cauldwell	3	5,416	1,805	-10	6,177	2,059	-2
6 Clapham	2	4,121	2,061	3	4,460	2,230	6
7 De Parys	2	4,237	2,119	5	4,516	2,258	7
8 Eastcotts	1	1,886	1,886	-6	2,209	2,209	5
9 Elstow	1	1,267	1,267	-37	1,957	1,957	-7
10 Goldington	3	6,277	2,092	4	6,166	2,055	-2
11 Great Barford	2	4,139	2,070	3	4,211	2,106	0
12 Harpur	3	6,281	2,094	4	6,133	2,044	-3
13 Harrold	1	2,129	2,129	6	2,157	2,157	3
14 Kempston East	2	4,325	2,163	8	4,190	2,095	0
15 Kempston North	2	4,072	2,036	1	3,756	1,878	-11
16 Kempston South	3	5,474	1,825	-9	6,191	2,064	-2
17 Kingsbrook	3	6,355	2,118	5	6,532	2,177	4
18 Newnham	2	3,899	1,950	-3	3,830	1,915	-9
19 Oakley	1	2,427	2,427	21	2,349	2,349	12
20 Putnoe	3	6,750	2,250	12	6,373	2,124	1
21 Queen's Park	2	4,721	2,361	18	4,604	2,302	10

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 %
22 Riseley	1	2,185	2,185	9	2,105	2,105	0
23 Roxton	1	2,278	2,278	13	2,184	2,184	4
24 Sharnbrook	1	2,111	2,111	5	2,169	2,169	3
25 Turvey	1	2,189	2,189	9	2,115	2,115	1
26 Wilshamstead	1	1,876	1,876	-7	2,383	2,383	13
27 Wootton	3	4,016	1,339	-33	5,737	1,912	-9
Totals	54	108,473	–	–	113,440	–	–
Averages	–	–	2,009	–	–	2,101	–

Source: Electorate figures are based on Bedford Borough Council's submission.

Note: 1. 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.

2. Due to errors which occurred during the formulation of the Borough Council's proposals, modifications have been made to the electorate totals for a number of proposed wards. This has meant that the alternative proposals formulated by the Conservatives and the Liberal Democrats were based upon inaccurate information leading to anomalies between the different sets of figures.

Bedford & Kempston Conservative Association's Proposed Electoral Arrangements

Figure A2: Bedford & Kempston Conservative Association's Proposals: 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 %
1 Biddenham	2	3,281	1,641	-20	4,650	2,325	9
2 Brickhill	3	6,708	2,236	9	6,329	2,110	-1
3 Bromham	2	4,076	2,038	0	4,166	2,083	-3
4 Bedford Park	2	4,920	2,460	20	4,865	2,433	14
5 Castle	3	6,744	2,248	10	6,552	2,184	2
6 Cauldwell	3	5,437	1,812	-11	6,264	2,088	-2
7 Clapham	2	4,121	2,061	1	4,460	2,230	4
8 Eastcotts	1	1,886	1,886	-8	2,209	2,209	3
9 Elstow	1	1,267	1,267	-38	1,957	1,957	-9
10 Great Barford	2	4,139	2,070	1	4,211	2,106	-2
11 Goldington	3	6,387	2,129	4	6,760	2,253	5
12 Harrold	1	2,129	2,129	4	2,157	2,157	1
13 Kempston North	2	4,302	2,151	5	4,070	2,035	-5
14 Kempston East	3	6,142	2,047	0	5,840	1,947	-9
15 Kempston West	2	3,523	1,762	-14	4,303	2,152	0
16 Kiingsbrook	3	6,274	2,091	2	6,404	2,135	0
17 Midland	2	4,752	2,376	16	4,527	2,264	6
18 Newnham	2	4,010	2,005	-2	3,905	1,953	-9
19 Oakley	1	2,427	2,427	19	2,349	2,349	10
20 Putnoe	3	6,579	2,193	7	6,199	2,066	-3
21 Queen's Park	2	4,721	2,361	15	4,604	2,302	8
22 Riseley	1	2,185	2,185	7	2,105	2,105	-2
23 Roxton	1	2,278	2,278	11	2,184	2,184	2
24 Sharnbrook	1	2,111	2,111	3	2,169	2,169	1
25 Turvey	1	2,189	2,189	7	2,115	2,115	-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 %
26 Wilshamstead	1	1,876	1,876	-8	2,383	2,383	11
27 Wootton	3	4,016	1,339	-35	5,737	1,912	-11
Totals	53	108,480	–	–	113,474	–	–
Averages	–	–	2,047	–	–	2,141	–

Source: Electorate figures are based on Bedford & Kempston Conservative Association's submission.

Note: 1. 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.

2. Due to errors which occurred during the formulation of the Borough Council's proposals, modifications have been made to the electorate totals for a number of proposed wards. This has meant that the alternative proposals formulated by the Conservatives and the Liberal Democrats were based upon inaccurate information leading to anomalies between the different sets of figures.

De Parys Liberal Democrats' Proposed Electoral Arrangements

Figure A3: De Parys Liberal Democrats' Proposals: 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 %
1 Biddenham	2	3,281	1,641	-20	4,650	2,325	8
2 Brickhill	3	7,014	2,338	14	6,565	2,188	2
3 Bromham	2	4,076	2,038	0	4,166	2,083	-3
4 Castle	3	6,423	2,141	5	6,214	2,071	-3
5 Cauldwell	3	5,416	1,805	-12	6,211	2,070	-3
6 Clapham	2	4,121	2,061	1	4,460	2,230	4
7 De Parys	3	6,274	2,091	2	6,436	2,145	0
8 Eastcotts	1	1,886	1,886	-8	2,209	2,209	3
9 Elstow	1	1,267	1,267	-38	1,923	1,923	-10
10 Goldington	3	6,625	2,208	8	6,718	2,239	4
11 Great Barford	2	4,139	2,070	1	4,611	2,306	8
12 Harpur	3	6,507	2,169	6	6,171	2,057	-4
13 Harrold	1	2,129	2,129	4	2,157	2,157	1
14 Kempston East	2	4,325	2,163	6	4,190	2,095	-2
15 Kempston North	2	4,072	2,036	-1	3,756	1,878	-12
16 Kempston South	3	5,474	1,825	-11	6,191	2,064	-4
17 Kingsbrook	3	6,355	2,118	4	6,532	2,177	2
19 Oakley	1	2,427	2,427	19	2,349	2,349	10
20 Putnoe	3	7,277	2,426	19	6,844	2,281	6
21 Queen's Park	2	4,721	2,361	15	4,604	2,302	7
22 Riseley	1	2,185	2,185	7	2,098	2,098	-2
23 Roxton	1	2,278	2,278	11	2,184	2,184	2
24 Sharnbrook	1	2,111	2,111	3	2,180	2,180	2

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 %
25 Turvey	1	2,189	2,189	7	2,115	2,115	-1
26 Wilshamstead	1	1,876	1,876	-8	2,383	2,383	11
27 Wootton	3	4,016	1,339	-35	5,737	1,912	-11
Totals	53	108,464	-	-	113,654	-	-
Averages	-	-	2,046	-	-	2,144	-

Source: Electorate figures are based on De Parys Liberal Democrats' submission.

Note: 1. 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.

2. Due to errors which occurred during the formulation of the Borough Council's proposals, modifications have been made to the electorate totals for a number of proposed wards. This has meant that the alternative proposals formulated by the Conservatives and the Liberal Democrats were based upon inaccurate information leading to anomalies between the different sets of figures.

APPENDIX B

The Statutory Provisions

Local Government Act 1992: the Commission's Role

1 Section 13(2) of the Local Government Act 1992 places a duty on the Commission to undertake periodic electoral reviews of each principal local authority area in England, and to make recommendations to the Secretary of State. Section 13(3) provides that, so far as reasonably practicable, the first such review of any area should be undertaken not less than 10 years, and not more than 15 years, after this Commission's predecessor, the Local Government Boundary Commission (LGBC), submitted an initial electoral review report on the county within which that area, or the larger part of the area, was located. This timetable applies to districts within shire and metropolitan counties, although not to South Yorkshire and Tyne and Wear¹. Nor does the timetable apply to London boroughs; the 1992 Act is silent on the timing of periodic electoral reviews in Greater London. Nevertheless, these areas will be included in the Commission's review programme. The Commission has no power to review the electoral arrangements of the City of London.

2 Under section 13(5) of the 1992 Act, the Commission is required to make recommendations to the Secretary of State for any changes to the electoral arrangements within the areas of English principal authorities as appear desirable to it, having regard to the need to:

- (a) reflect the identities and interests of local communities; and
- (b) secure effective and convenient local government.

3 In reporting to the Secretary of State, the Commission may make recommendations for such changes to electoral arrangements as are specified in section 14(4) of the 1992 Act. In relation to principal authorities, these are:

- the total number of councillors to be elected to the council;
- the number and boundaries of electoral areas (wards or divisions);
- the number of councillors to be elected for each electoral area, and the years in which they are to be elected; and
- the name of any electoral area.

¹ The Local Government Boundary Commission did not submit reports on the counties of South Yorkshire and Tyne and Wear.

4 Unlike the LGBC, the Commission may also make recommendations for changes in respect of electoral arrangements within parish and town council areas. Accordingly, in relation to parish or town councils within a principal authority's area, the Commission may make recommendations relating to:

- the number of councillors;
- the need for parish wards;
- the number and boundaries of any such wards;
- the number of councillors to be elected for any such ward or, in the case of a common parish, for each parish; and
- the name of any such ward.

5 In conducting the review, section 27 of the 1992 Act requires the Commission to comply, so far as is practicable, with the rules given in Schedule 11 to the Local Government Act 1972 for the conduct of electoral reviews.

Local Government Act 1972: Rules to be Observed in Considering Electoral Arrangements

6 By virtue of section 27 of the Local Government Act 1992, in undertaking a review of electoral arrangements the Commission is required to comply so far as is reasonably practicable with the rules set out in Schedule 11 to the 1972 Act. For ease of reference, those provisions of Schedule 11 which are relevant to this review are set out below.

7 In relation to shire districts:

Having regard to any changes in the number or distribution of the local government electors of the district likely to take place within the period of five years immediately following the consideration (by the Secretary of State or the Commission):

- (a) the ratio of the number of local government electors to the number of councillors to be elected shall be, as nearly as may be, the same in every ward in the district;
- (b) in a district every ward of a parish council shall lie wholly within a single ward of the district;
- (c) in a district every parish which is not divided into parish wards shall lie wholly within a single ward of the district.

8 The Schedule also provides that, subject to (a)–(c) above, regard should be had to:

- (d) the desirability of fixing ward boundaries which are and will remain easily identifiable; and

(e) any local ties which would be broken by the fixing of any particular ward boundary.

9 The Schedule provides that, in considering whether a parish should be divided into wards, regard shall be had to whether:

(f) the number or distribution of electors in the parish is such as to make a single election of parish councillors impracticable or inconvenient; and

(g) it is desirable that any area or areas of the parish should be separately represented on the parish council.

10 Where it is decided to divide any such parish into parish wards, in considering the size and boundaries of the wards and fixing the number of parish councillors to be elected for each ward, regard shall be had to:

(h) any change in the number or distribution of electors of the parish which is likely to take place within the period of five years immediately following the consideration;

(i) the desirability of fixing boundaries which are and will remain easily identifiable; and

(j) any local ties which will be broken by the fixing of any particular boundaries.

11 Where it is decided not to divide the parish into parish wards, in fixing the number of councillors to be elected for each parish regard shall be had to the number and distribution of electors of the parish and any change which is likely to take place within the period of five years immediately following the fixing of the number of parish councillors.

APPENDIX C

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.

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