

Draft recommendations on the
future electoral arrangements for
Chichester in West Sussex

February 2002

© Crown Copyright 2002

Applications for reproduction should be made to: Her Majesty's Stationery Office Copyright Unit.

The mapping in this report is reproduced from OS mapping by the Local Government Commission for England with the permission of the Controller of Her Majesty's Stationery Office, © Crown Copyright.

Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings.
Licence Number: GD 03114G.

This report is printed on recycled paper.

CONTENTS

	page
WHAT IS THE LOCAL GOVERNMENT COMMISSION FOR ENGLAND?	<i>v</i>
SUMMARY	<i>vii</i>
1 INTRODUCTION	<i>1</i>
2 CURRENT ELECTORAL ARRANGEMENTS	<i>5</i>
3 SUBMISSIONS RECEIVED	<i>9</i>
4 ANALYSIS AND DRAFT RECOMMENDATIONS	<i>13</i>
5 WHAT HAPPENS NEXT?	<i>33</i>
APPENDICES	
A Draft Recommendations for Chichester: Detailed Mapping	<i>35</i>
B Code of Practice on Written Consultation	<i>39</i>

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

WHAT IS THE 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 on whether there should be changes to local authorities' electoral arrangements.

Members of the Commission:

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 required by law to review the electoral arrangements of every principal local authority in England. Our aim 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, the number of councillors, ward names and the frequency of elections. We can also recommend changes to the electoral arrangements of parish and town councils.

With effect from 1 April 2002, the Electoral Commission will assume the functions of the Local Government Commission for England and take over responsibility for making Orders putting in place the new arrangements resulting from periodic electoral reviews (powers which currently reside with the Secretary of State). As part of this transfer the Electoral Commission will set up a Boundary Committee for England which will take over responsibility for the conduct of PERs from the Local Government Commission. The Boundary Committee will conduct electoral reviews following the same rules and in the same manner as the Local Government Commission for England. Its final recommendations on future electoral arrangements will then be presented to the Electoral Commission which will be able to accept, modify or reject the Boundary Committee's findings. Under these new arrangements there will remain a further opportunity to make representations directly to the Electoral Commission after the publication of the final recommendations. Interested parties will have a further six weeks to send comments to the Electoral Commission.

SUMMARY

We began a review of Chichester's electoral arrangements on 10 July 2001.

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

We found that the current arrangements provide unequal representation of electors in Chichester.

- **In 20 of the 34 wards the number of electors represented by each councillor varies by more than 10 per cent from the average for the district and 11 wards vary by more than 20 per cent.**
- **By 2006 this situation is expected to deteriorate, with the number of electors per councillor forecast to vary by more than 10 per cent from the average in 21 wards and by more than 20 per cent in 13 wards.**

Our main proposals for Chichester's future electoral arrangements (see Tables 1 and 2 and paragraphs (113–114) are that:

- **Chichester District Council should have 48 councillors, two fewer than at present;**
- **there should be 29 wards, instead of 34 as at present;**
- **the boundaries of 28 of the existing wards should be modified, resulting in a net reduction of five, and six wards should retain their existing boundaries;**
- **whole-council elections should continue to take place every four years.**

The purpose of these proposals is to ensure that, in future, each district councillor represents approximately the same number of electors, bearing in mind local circumstances.

- **In 25 of the proposed 29 wards the number of electors per councillor would vary by no more than 10 per cent from the district average.**
- **This level of electoral equality is expected to improve further with the number of electors per councillor in 26 wards expected to vary by no more than 10 per cent from the average for the district by 2006.**

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

- **revised warding arrangements for Chichester City Council and Selsey Town Council.**

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

- **We will consult on these proposals for eight weeks from 26 February 2002. We take this consultation very seriously. We may decide to move away from our draft recommendations in the light of comments or suggestions that we receive. 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. We will then submit our final recommendations to the Electoral Commission which, with effect from 1 April 2002, will be responsible for implementing change to local authority electoral arrangements.**
- **The Electoral Commission will decide whether to accept, modify or reject our final recommendations. It will also decide when any changes come into effect.**

You should express your views by writing directly to us at the address below by 22 April 2002:

**Review Manager
Chichester Review
LGCE
Dolphyn Court
10/11 Great Turnstile
London WC1V 7JU**

**Fax: 020 7404 6142
E-mail: reviews@lgce.gov.uk
Website: www.lgce.gov.uk**

Table 1: Draft Recommendations: Summary

Ward name	Number of councillors	Constituent areas	Map Reference
1 Bosham	2	The parishes of Bosham and Chidham	Map 2
2 Boxgrove	1	The parishes of Boxgrove, Eartham, East Dean, Singleton, Upwaltham and West Dean	Map 2
3 Bury	1	The parishes of Barlavington, Bignor, Bury, Duncton, East Lavington, Graffham and Sutton	Map 2
4 Chichester East	3	Part of the parish of Chichester (the proposed East parish ward)	Large map and Map 2
5 Chichester North	3	Part of the parish of Chichester (the proposed North parish ward)	Large map and Map 2
6 Chichester South	3	Part of the parish of Chichester (the proposed South parish ward)	Large map and Map 2
7 Chichester West	2	Part of the parish of Chichester (the proposed West parish ward)	Large map and Map 2
8 Donnington	1	<i>Unchanged</i> – the parishes of Appledram and Donnington	Map 2
9 Easebourne	1	The parishes of Easebourne and Lodsworth	Map 2
10 East Wittering	2	<i>Unchanged</i> – the parishes of Earnley and East Wittering	Map 2
11 Fernhurst	2	The parishes of Fernhurst, Linchmere and Linch	Map 2
12 Fishbourne	1	<i>Unchanged</i> – the parish of Fishbourne	Map 2
13 Funtington	1	The parishes of Compton, Funtington and Stoughton	Map 2
14 Harting	1	The parishes of Elsted, Harting, Marden, Treyford and Trotton with Chithurst	Map 2
15 Lavant	1	<i>Unchanged</i> – the parishes of Lavant and Westhampnett	Map 2
16 Midhurst	2	The parish of Midhurst	Map 2
17 North Mundham	1	The parishes of North Mundham and Oving	Map 2
18 Petworth	2	The parishes of Ebernoe, Fittleworth, Petworth, Stopham and Tillington	Map 2
19 Plaistow	2	The parishes of Loxwood, Lurgashall, Northchapel and Plaistow	Map 2
20 Rogate	1	The parishes of Milland and Rogate	Map 2
21 Selsey North	3	Part of the parish of Selsey (the proposed North parish ward)	Maps 2 and A2
22 Selsey South	2	Part of the parish of Selsey (the proposed South parish ward)	Maps 2 and A2
23 Sidlesham	1	The parishes of Hunston and Sidlesham	Map 2
24 Southbourne	3	<i>Unchanged</i> – the parishes of Southbourne and West Thorney	Map 2
25 Stedham	1	The parishes of Bepton, Cocking, Heyshott, Stedham with Iping, West Lavington and Woolbeding	Map 2
26 Tangmere	1	The parish of Tangmere	Map 2

27	Westbourne	1	<i>Unchanged</i> – the parish of Westbourne	Map 2
28	West Wittering	2	The parishes of Birdham, West Itchenor and West Wittering	Map 2
29	Wisborough Green	1	The parishes of Kirdford and Wisborough Green	Map 2

Notes: 1 The whole district is parished.

2 The wards in the above table are illustrated on Map 2, Map A2 in Appendix A and on the large map at the back of this report.

3 We have made a number of minor boundary amendments to ensure that existing ward boundaries adhere to ground detail. These changes do not affect any electors.

4 The wards in the above table and their constituent parts take account of amended parish boundaries which have been approved by the Secretary of State and set out in The Chichester (Parishes) Order 2001.

Table 2: Draft Recommendations for Chichester

	Ward name	Number of councillors	Electorate (2001)	Number of electors per councillor	Variance from average %	Electorate (2006)	Number of electors per councillor	Variance from average %
1	Bosham	2	3,248	1,624	-7	3,391	1,696	-9
2	Boxgrove	1	1,709	1,709	-3	1,766	1,766	-5
3	Bury	1	1,787	1,787	2	1,831	1,831	-2
4	Chichester East	3	5,128	1,709	-3	5,859	1,953	5
5	Chichester North	3	4,596	1,532	-13	5,184	1,728	-7
6	Chichester South	3	4,829	1,610	-8	5,238	1,746	-6
7	Chichester West	2	3,737	1,869	6	3,881	1,941	4
8	Donnington	1	1,727	1,727	-2	1,834	1,834	-1
9	Easebourne	1	1,884	1,884	7	1,942	1,942	4
10	East Wittering	2	3,679	1,840	5	4,121	2,061	11
11	Fernhurst	2	3,866	1,933	10	3,949	1,975	6
12	Fishbourne	1	1,634	1,634	-7	1,807	1,807	-3
13	Funtington	1	1,982	1,982	13	2,010	2,010	8
14	Harting	1	1,707	1,707	-3	1,744	1,744	-6
15	Lavant	1	1,606	1,606	-8	1,735	1,735	-7
16	Midhurst	2	3,874	1,937	10	4,052	2,026	9
17	North Mundham	1	1,633	1,633	-7	1,664	1,664	-11
18	Petworth	2	3,728	1,864	6	3,984	1,992	7
19	Plaistow	2	3,676	1,838	5	3,792	1,896	2
20	Rogate	1	1,997	1,997	14	2,004	2,004	8
21	Selsey North	3	4,783	1,594	-9	5,140	1,713	-8
22	Selsey South	2	3,285	1,643	-6	3,436	1,718	-8
23	Sidlesham	1	1,749	1,749	0	1,841	1,841	-1
24	Southbourne	3	5,336	1,779	1	5,591	1,864	0
25	Stedham	1	1,891	1,891	8	1,911	1,911	3
26	Tangmere	1	1,585	1,585	-10	1,750	1,750	-6

27	Westbourne	1	1,596	1,596	-9	1,701	1,701	-9
28	West Wittering	2	4,076	2,038	16	4,223	2,112	13
29	Wisborough Green	1	1,899	1,899	8	1,928	1,928	4
Totals		48	84,227	–	–	89,309	–	–
Averages		–	–	1,755	–	–	1,861	–

Source: Electorate figures are based on information provided by Chichester District Council.

Notes: 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 district. The minus symbol (-) denotes a lower than average number of electors. Figures have been rounded to the nearest whole number.

2 The wards in the above table and their constituent parts take account of amended parish boundaries which have been approved by the Secretary of State and set out in The Chichester (Parishes) Order 2001.

1 INTRODUCTION

1 This report contains our proposals for the electoral arrangements for the district of Chichester in West Sussex, on which we are now consulting. We are reviewing the seven districts in West Sussex 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 expected to finish in 2004.

2 This is our first review of the electoral arrangements of Chichester. Chichester's last review was carried out by our predecessor, the Local Government Boundary Commission (LGBC), which reported to the Secretary of State in February 1977 (Report no. 184). The electoral arrangements of West Sussex County Council were last reviewed in June 1984 (Report no. 473). We expect to begin reviewing the County Council's electoral arrangements towards the end of this year.

3 In carrying out 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.

4 Full details of the legislation under which we work are set out in a document entitled *Guidance and Procedural Advice for Local Authorities and Other Interested Parties* (fourth edition published in December 2000). This *Guidance* sets out our approach to the reviews.

5 Our task is to make recommendations on the number of councillors who should serve on a council, and the number, boundaries and names of wards. We can also propose changes to the electoral arrangements for parish and town councils in the district.

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

7 The broad objective of PERs is to achieve, as far as possible, equal representation across the district as a whole. Schemes which would result in, or retain, an electoral imbalance of over 10 per cent in any ward will have to be fully justified. 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 assumption that the size of the existing council already secures effective and convenient local government, 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 electorate should automatically result in an increase in the number of councillors, nor that changes should be made to the size of a council simply to make it more consistent with the size of other similar councils.

9 The review is in four stages (see Table 3).

Table 3: Stages of the Review

Stage	Description
One	Submission of proposals to us
Two	Our analysis and deliberation
Three	Publication of draft recommendations and consultation on them
Four	Final deliberation and report to the Electoral Commission

10 In July 1998 the Government published a White Paper called *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 of 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 were taken forward in the Local Government Act 2000 which, among other matters, states 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 current *Guidance*.

11 Stage One began on 10 July 2001, when we wrote to Chichester District Council inviting proposals for future electoral arrangements. We also notified West Sussex County Council, Sussex Police, the local authority associations, West Sussex Association of Local Councils, parish and town councils in the district, the Members of Parliament with constituencies in the district, the Members of the European Parliament for the South East Region and the headquarters of the main political parties. We placed a notice in the local press, issued a press release and invited Chichester District Council to publicise the review further. The closing date for receipt of submissions (the end of Stage One) was 15 October 2001.

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

13 We are currently at Stage Three. This stage, which began on 26 February 2002 and will end on 22 April 2002, involves publishing the draft proposals 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 these draft proposals.**

14 During Stage Four we will reconsider the draft recommendations in the light of the Stage Three consultation, decide whether to modify them, and submit final recommendations to the Electoral Commission. The Electoral Commission will decide whether to accept, modify or reject our final recommendations. If the Electoral Commission accepts the recommendations, with or without modification, it will make an Order and decide when any changes come into effect.

2 CURRENT ELECTORAL ARRANGEMENTS

15 The district of Chichester is situated in the west of the County of West Sussex, and stretches from the Hampshire border to upper Arun and from the Surrey border to the English Channel. The district covers a predominantly rural area of 78,678 hectares and is entirely parished, containing 67 parishes. The district also contains Chichester City and Selsey Town councils. The area has good transport links and is traversed by the A27 trunk road and the London to Portsmouth railway.

16 The electorate of the district is 84,227 (February 2001). The Council presently has 50 members who are elected from 34 wards, four of which make up the city of Chichester, with the remainder being mainly rural. Five of the wards are each represented by three councillors, six are each represented by two councillors and 23 are single-member wards. The Council is elected as a whole every four years.

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

18 At present, each councillor represents an average of 1,685 electors, which the District Council forecasts will increase to 1,786 by the year 2006 if the present number of councillors is maintained. However, due to demographic change and migration since the last review, the number of electors per councillor in 20 of the 34 wards varies by more than 10 per cent from the district average, 11 wards by more than 20 per cent and seven wards by more than 30 per cent. The worst imbalance is in East Wittering ward where the councillor represents 115 per cent more electors than the district average.

Map 1: Existing Wards in Chichester

Table 4: Existing Electoral Arrangements

	Ward name	Number of councillors	Electorate (2001)	Number of electors per councillor	Variance from average %	Electorate (2006)	Number of electors per councillor	Variance from average %
1	Birdham	1	1,651	1,651	-2	1,716	1,716	-4
2	Bosham	1	2,286	2,286	36	2,416	2,416	35
3	Boxgrove	1	1,409	1,409	-16	1,461	1,461	-18
4	Bury	1	1,197	1,197	-29	1,218	1,218	-32
5	Chichester East	3	4,956	1,652	-2	5,566	1,855	4
6	Chichester North	3	4,768	1,589	-6	5,477	1,826	2
7	Chichester South	3	4,175	1,392	-17	4,584	1,528	-14
8	Chichester West	3	4,391	1,484	-13	4,535	1,512	-15
9	Donnington	1	1,727	1,727	3	1,834	1,834	3
10	Easebourne	1	1,358	1,358	-19	1,408	1,408	-21
11	East Wittering	1	3,629	3,629	115	4,071	4,071	128
12	Fernhurst	2	2,548	1,274	-24	2,609	1,305	-27
13	Fishbourne	1	1,634	1,634	-3	1,807	1,807	1
14	Funtington	1	1,981	1,981	18	2,014	2,014	13
15	Graffham	1	1,413	1,413	-16	1,450	1,450	-19
16	Harting	1	1,376	1,376	-18	1,401	1,401	-22
17	Hunston	1	1,747	1,747	4	1,829	1,829	2
18	Lavant	1	1,606	1,606	-5	1,735	1,735	-3
19	Linchmere	1	1,265	1,265	-25	1,284	1,284	-28
20	Lodsworth	1	1,420	1,420	-16	1,427	1,427	-20
21	Midhurst	2	4,125	2,063	22	4,310	2,155	21
22	Oving	1	2,288	2,288	36	2,472	2,472	38
23	Petworth	2	3,084	1,542	-8	3,313	1,657	-7
24	Plaistow	2	3,360	1,680	0	3,491	1,746	-2
25	Rogate	1	1,535	1,535	-9	1,543	1,543	-14
26	Selsey North	2	3,483	1,742	3	3,866	1,933	8
27	Selsey South	2	4,585	2,293	36	4,710	2,355	32
28	Sidlesham	1	932	932	-45	954	954	-47
29	Southbourne	3	5,502	1,834	9	5,757	1,919	7

30	Stedham	1	1,597	1,597	-5	1,601	1,601	-10
31	Stoughton	1	1,163	1,163	-31	1,185	1,185	-34
32	Westbourne	1	1,596	1,596	-5	1,701	1,701	-5
33	West Wittering	1	2,475	2,475	47	2,557	2,557	43
34	Wisborough Green	1	1,965	1,965	17	2,007	2,007	12
Totals		50	84,227	-	-	89,309	-	-
Averages		-	-	1,685	-	-	1,786	-

Source: Electorate figures are based on information provided by Chichester District 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 district. The minus symbol (-) denotes a lower than average number of electors. For example, in 2001, electors in Sidlesham ward were relatively over-represented by 45 per cent, while electors in East Wittering ward were relatively under-represented by 115 per cent. Figures have been rounded to the nearest whole number.

3 SUBMISSIONS RECEIVED

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

20 During this initial stage of the review, officers from the LGCE visited the area and met officers and members from the District Council. We are grateful to all concerned for their co-operation and assistance. We received 15 submissions during Stage One, including a district-wide scheme from the District Council, all of which may be inspected at our offices and those of the District Council.

Chichester District Council

21 The District Council initially consulted locally on a scheme based on a council size of 46, a reduction of four, representing 21 wards. Following an extensive consultation process with parish councils and other interested parties, it was decided that the original scheme should not be proceeded with. A revised scheme based on a council size of 47 members representing 29 wards was submitted. The Council stated “it was considered that this new scheme more than adequately acknowledged the representations made, particularly by parish councils with regard to local identities and the sharing of common interests”. Copies of the representations received during this consultation period were enclosed as part of the Council’s submission to the Commission.

22 The District Council argued that the proposed reduction in council size to 47 was acceptable, stating “it is considered that the revised political management model means that a small reduction in councillors would be appropriate”. Under the Council’s scheme, Chichester City would be allocated 10 councillors and Selsey Town would be allocated five councillors. Both Selsey Town and Chichester City would be re-warded to reflect the revised district boundaries. The Council’s scheme provided for a much improved level of electoral equality throughout the district, and required no other consequential warding of parishes. It also proposed that the existing electoral cycle of whole-council elections every four years should be retained. Under the District Council’s proposals, nine of the proposed 29 wards would vary by more than 10 per cent from the district average initially, improving to three wards by 2006.

Chichester Liberal Democrats

23 Chichester Liberal Democrats (the Liberal Democrats) expressed support for the Council’s proposals in the rural area and in Selsey. However, they proposed that the Chichester City area be allocated 11 councillors (and therefore proposed an overall council size of 48) and proposed revised warding for the City largely based on the existing arrangements. Under the Liberal Democrats proposals, based on a council size of 48, three of the proposed 29 wards would vary by more than 10 per cent from the district average initially, deteriorating to four wards by 2006.

Parish and Town Councils

24 We received eight representations from parish and town councils. Chichester City Council proposed a scheme based on the existing council size of 50 members, retaining 12 councillors for the city of Chichester. It argued that “everyone in the City is happy with the current ward arrangements and number of councillors”. Its scheme would include a four-member Witterings ward and a five-member Selsey ward. Five of its proposed wards would vary by more than 10 per cent from the district average by 2006. It also stated that it would support a 49-member scheme, so long as Chichester retained 12 councillors. Further information relating to this submission was requested but not received.

25 Easebourne Parish Council “overwhelmingly” objected to any proposal to combine the parish with Midhurst, arguing that “Easebourne may look like a northern suburb of Midhurst, but this is far from being the case”. It therefore broadly supported the District Council’s proposals which united the parish with Lodsworth with which the parish argues it has “much more in common”. Harting Parish Council broadly supported the District Council’s proposals in relation to its proposed Harting and Rogate wards. Lurgashall Parish Council expressed opposition to the District Council’s proposed Plaistow ward, arguing that it has “long-established links” with the parishes of Northchapel, Lodsworth and Tillington, with which it was grouped under the District Council’s original 46-member consultation scheme. Northchapel Parish Council opposed the District Council’s proposed Plaistow ward, arguing that Northchapel and Ebernoe parishes should form part of the same district ward. It stated that it broadly supported the District Council’s original proposals for this area under its 46-member consultation scheme, subject to Ebernoe parish being included in the same ward as Northchapel parish.

26 Tillington Parish Council opposed the District Council’s proposed Petworth ward and expressed support for the proposals under the 46-member local consultation scheme. Westhampnett Parish Council broadly supported the District Council’s proposed Lavant ward based on the fact that it “would prefer to be represented by one councillor rather than three”. Wisborough Green Parish Council broadly supported the District Council’s proposed Wisborough Green ward, stating that it has similar issues to Kirdford parish, with which it would be combined within the Council’s proposed single-member ward.

Other Submissions

27 We received a further five representations from local political parties, West Sussex County Council, a District Councillor and a local resident. Chichester Constituency Labour Party (the Labour Party) expressed support for the District Council’s proposals. However, it stated that “we support with reservations their plan for Chichester City division reducing the number of councillors to 10 from 12”. The United Kingdom Independence Party expressed the view that “we consider that the general idea for this reorganisation emanates from the EU”, further contending that “no action is being taken to deal with the position of [West Sussex County Council] representation”, concluding that “the current review is the first step to doing away with County Council altogether”. It proposed that the existing warding arrangements be retained throughout the district, strongly opposing the creation of three-member wards in the rural area and the proposed reduction of councillors serving Chichester City.

28 West Sussex County Council commented on the Council's proposals, largely in relation to the forthcoming review of the County Council. It forwarded comments from County Councillor Waller (Midhurst), who proposed that Midhurst be a separate ward and that Heyshott parish should form part of the proposed Easebourne ward. It was stated that "this adjustment would leave district wards within the boundaries of two existing county electoral divisions".

29 District Councillor Clay proposed a new three-member The Witterings ward comprising the parishes of East Wittering and West Wittering, transferring Earnley parish to the neighbouring Sidlesham ward. She argued that Earnley shares many rural issues with Sidlesham and there are many links between East and West Wittering. She also expressed broad support for the District Council's proposed North Mundham ward. Finally, a local resident expressed a view regarding the appropriateness of multi-member wards in rural areas, arguing that "this does in my view not improve representation for local people".

4 ANALYSIS AND DRAFT RECOMMENDATIONS

30 We have not finalised our conclusions on the electoral arrangements for Chichester and welcome comments from all those interested 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.

31 As described earlier, our primary aim in considering the most appropriate electoral arrangements for Chichester is 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 of the Local Government Act 1972, which refers to the number of electors per councillor being “as nearly as may be, the same in every ward of the district or borough”.

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

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

34 Our *Guidance* states that we accept that the achievement of absolute electoral equality for an authority as a whole is likely to be unattainable. However, we consider that, if electoral imbalances are to be minimised, the aim 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 make electoral equality their starting point, and then make adjustments to reflect relevant factors such as community identity and interests. Five-year forecasts of changes in electorate must also be considered and we would aim to recommend a scheme which provides improved electoral equality over this five-year period.

Electorate Forecasts

35 Since 1975 there has been approximately a 17 per cent increase in the electorate of Chichester district. The District Council submitted electorate forecasts for the year 2006, projecting an increase in the electorate of approximately 6 per cent from 84,227 to 89,309 over the five-year period from 2001 to 2006. It expects most of the growth to be in the Chichester City area. To prepare these forecasts, the Council estimated rates and locations of housing development with regard to structure and local plans, the expected rate of building over the five-year period and assumed occupancy rates. Advice from the District Council on the likely effect on electorates of changes to ward boundaries has been obtained.

36 We know that forecasting electorates is difficult and, having looked at the District Council’s figures, accept that they are the best estimates that can reasonably be made at this time.

Council Size

37 As explained earlier, we start by assuming 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.

38 Chichester District Council presently has 50 members. The District Council initially put a 46-member scheme out for consultation and, following a significant response from interested parties, a revised scheme was formulated based on a council size of 47. It stated that “new political structures have been implemented during the past two years and the Council considered a number of alternative council sizes ranging from 45 to 52”. The District Council also concluded that the new internal political management structure it has put in place means that “a small reduction of councillors would be appropriate and would assist in ensuring that councillors continue to play a full part in the activities of the council and would also be appropriate in achieving better electoral equality”.

39 The Liberal Democrats expressed support for the District Council’s revised 47-member scheme. However, they proposed that the Chichester City area be allocated an additional councillor, increasing the level of representation for the City from 10 to 11 and consequently increasing the overall revised council size from 47 to 48.

40 Chichester City Council proposed a scheme based on the existing council size of 50 members, retaining 12 councillors for the city of Chichester. It argued that “everyone in the City is happy with the current ward arrangements and number of councillors”. However, this scheme was incomplete and we were therefore unable to fully take it into account. In addition, it stated that it would support a 49-member scheme, so long as Chichester retained 12 councillors.

41 The Labour Party expressed support for the District Council’s proposals. However, it stated that “we support with reservations their plan for Chichester City division reducing the number of councillors to 10 from 12”.

42 The United Kingdom Independence Party proposed that the existing warding arrangements be retained throughout the district, strongly opposing the creation of three-member wards in the rural area and the proposed reduction of councillors serving Chichester City.

43 We carefully considered all the representations received relating to council size. We concluded that our starting point should be to determine the most appropriate allocation of councillors between Chichester City, Selsey and the rural part of the district. At present, under a council size of 50, Chichester City is entitled to 11.3 councillors by 2006 and currently has 12, while Selsey town is entitled to 4.8 councillors and currently has four. The issue of over-representation in Chichester and under-representation in Selsey was addressed as part of the Council’s submission. However, although under the Council’s proposed council size of 47 the allocation between the three areas is correct for 2001, it is incorrect in Chichester City by 2006, which would be entitled to 10.6 councillors and has been allocated 10. By adopting a council size of 48 (as per the Liberal Democrats’ proposals), Chichester City would be entitled to 10.8 councillors by 2006 and have 11, Selsey would be entitled to 4.6 councillors and would have five and the rest of the district would be entitled to 32.5 councillors and

would have 32. We therefore concluded that the most appropriate allocation between the Chichester City, Selsey and rural part of the district would best be met by a council size of 48 members. In addition, this slight modification to the proposed council size would not have too great an impact on the level of electoral equality in the Council's proposed wards.

44 Having looked at the size and distribution of the electorate, the geography and other characteristics of the area, together with the responses received, we conclude that the achievement of electoral equality and the statutory criteria would best be met by a council of 48 members.

Electoral Arrangements

45 In view of the support given to large elements of the Council's proposals, and the consultation exercise which it undertook with interested parties, we have decided to base our draft recommendations on the District Council's scheme, together with elements of the Liberal Democrats' proposals. We consider that this 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, as detailed above, in order to facilitate the correct allocation of councillors between Chichester City, Selsey and rural parts of the district, we propose adopting a council size of 48 members as opposed to the council size of 47 proposed by the District Council. This would result in the Chichester City area being allocated the 11 councillors which it merits, and would have a minimal effect on the levels of electoral equality achieved under the District Council's proposals for the remainder of the district. We therefore propose adopting the Liberal Democrats proposed wards for Chichester City, subject to one minor amendment. In the remainder of the district we propose moving away from the District Council's proposals in two areas in order to provide for more clearly identifiable boundaries and improved levels of electoral equality. For district warding purposes, the following areas, based on existing wards, are considered in turn:

- (a) Chichester East, Chichester North, Chichester South and Chichester West wards;
- (b) Selsey North and Selsey South wards;
- (c) Birdham, East Wittering and West Wittering wards;
- (d) Bosham, Donnington and Fishbourne wards;
- (e) Southbourne and Westbourne wards;
- (f) Hunston, Oving and Sidlesham wards;
- (g) Funtington, Harting and Stoughton wards;
- (h) Boxgrove and Lavant wards;
- (i) Bury, Graffham and Midhurst wards;
- (j) Fernhurst, Linchmere, Rogate and Stedham wards;
- (k) Easebourne, Lodsworth and Petworth wards;
- (l) Plaistow and Wisborough Green wards.

46 Details of our draft recommendations, including changes to take account of amended parish boundaries which have been approved by the Secretary of State and set out in The Chichester (Parishes) Order 2001, are set out in Tables 1 and 2, and illustrated on Map 2, in Appendix A and on the large map inserted at the back of this report.

Chichester East, Chichester North, Chichester South and Chichester West wards

47 The existing wards of Chichester East, Chichester North, Chichester South and Chichester West are situated in the south of the district. All four wards are currently each represented by three councillors and are coterminous with the four parish wards which comprise Chichester City Council. Under existing arrangements, Chichester East, Chichester North, Chichester South and Chichester West wards are all over-represented and contain 2 per cent, 6 per cent, 17 per cent and 13 per cent fewer electors per councillor than the district average respectively (4 per cent more, 2 per cent more, 14 per cent fewer and 15 per cent fewer by 2006).

48 At Stage One, Chichester District Council proposed revised warding arrangements for the Chichester City area, resulting in a reduction in the number of councillors serving the area from 12 to 10. It stated that “this would necessitate a revision of the existing wards”. It proposed a revised three-member Chichester East ward comprising the existing ward, together with the area to the east of Whyke Road and the area surrounding Whyke Lake from the existing Chichester South ward. A revised three-member Chichester North ward would comprise the existing ward, together with the areas broadly to the west of Centurion Way and bounded by West Street and Orchard Street from the existing Chichester West ward. A revised two-member Chichester South ward would comprise the existing ward, less the area broadly to the east of Whyke Road and the area surrounding Whyke Lake, as detailed above and the area bounded by Stockbridge Road and the Chichester By Pass, around Terminus Road. Finally, a revised two-member Chichester West ward would comprise the existing ward, less the area broadly to the west of Centurion Way and bounded by West Street and Orchard Street, as detailed above, together with the area bounded by Stockbridge Road and the Chichester By Pass from the existing Chichester South ward, as detailed above. Under the District Council’s proposals based on a council size of 47, the revised Chichester East, Chichester North, Chichester South and Chichester West wards would contain 8 per cent fewer, 11 per cent fewer, 16 per cent more and 23 per cent more electors per councillor than the district average respectively (4 per cent, 4 per cent, 10 per cent and 8 per cent more by 2006).

49 The Liberal Democrats proposed that the Chichester City area be allocated 11 councillors (therefore proposing an overall council size of 48). They proposed revised warding for the City largely based on the existing arrangements. They proposed retaining the existing three-member Chichester East and Chichester North wards, and proposed a revised three-member Chichester South ward and two-member Chichester West ward. They proposed that the boundary between the revised Chichester South and Chichester West wards should broadly follow West Street, Westgate and Cathedral Way. Under the Liberal Democrats’ proposals based on a council size of 48, Chichester East, Chichester North, Chichester South and Chichester West wards would contain 6 per cent fewer, 9 per cent fewer, 8 per cent fewer and 6 per cent more electors per councillor than the district average respectively (equal to the average, 2 per cent fewer, 6 per cent fewer and 4 per cent more by 2006).

50 Chichester City Council proposed a scheme based on the existing council size of 50 members, retaining 12 councillors for the city of Chichester, although the scheme was incomplete and no specific boundaries were submitted. It argued that “everyone in the City is happy with the current ward arrangements and number of councillors”. It also stated that it would support a 49-member scheme, on the condition that Chichester retained 12 councillors.

51 The Labour Party expressed support for the District Council's proposals. However, it stated that "we support with reservations their plan for Chichester City division reducing the number of councillors to 10 from 12". The United Kingdom Independence Party expressed opposition to the proposed reduction of councillors serving Chichester City.

52 Having considered the representations received at Stage One, we have decided to adopt the Liberal Democrats' proposals, based on 11 councillors for the Chichester City area, subject to one minor amendment to provide for a more clearly identifiable boundary. We propose transferring the area surrounding Mansbergh Road and Palmers Field, together with a future development site, from the proposed Chichester North ward to the proposed Chichester East ward. As discussed earlier, we are proposing to base our draft recommendations on a council size of 48, as we are of the view that this would provide for the most appropriate allocation of councillors between the Chichester City, Selsey and rural parts of the district. Under this proposed council size of 48, the Chichester City area would be entitled to 11 councillors by 2006. We are therefore unable to utilise the proposals made by the District Council or the City Council which would allocate the city 10 and 12 councillors respectively. In addition, we consider that the Liberal Democrats' proposals, as well as being largely based on existing boundaries, utilise strong boundaries such as St Paul's Road and Bognor Road.

53 Under our draft recommendations, based on a council size of 48, Chichester East, Chichester North, Chichester South and Chichester West wards would contain 3 per cent fewer, 13 per cent fewer, 8 per cent fewer and 6 per cent more electors per councillor than the district average respectively (5 per cent more, 7 per cent fewer, 6 per cent fewer and 4 per cent more by 2006). Our proposals for this area are illustrated on Map 2 and on the large map at the back of this report.

Selsey North and Selsey South wards

54 The existing wards of Selsey North and Selsey South are situated in the extreme south of the district. Both wards are each currently represented by two councillors and are coterminous with the two parish wards which comprise Selsey Town Council. Under existing arrangements Selsey North and Selsey South wards contain 3 per cent and 36 per cent more electors per councillor than the district average respectively (8 per cent and 32 per cent more by 2006).

55 At Stage One, the District Council proposed revised wards in the Selsey area, based on an increase in the number of councillors representing the area from four to five. The proposal was based on proposals from Selsey Town Council, with the District Council stating that "a scheme was submitted by Selsey Town Council which the Council consider to be acceptable and it is recommended that the re-warding suggested by that Council be approved". The District Council's proposals provided for a revised three-member Selsey North ward and a revised two-member Selsey South ward. A revised boundary between the two wards would broadly follow the rear of properties on the north side of Albion Road, East Street and West Street, resulting in the transfer of approximately 1,300 electors from Selsey South ward to Selsey North ward. The Council stated "the proposal for the new boundaries of the North and South wards does provide that the only street which actually falls within both wards is High Street. All other streets are contained wholly within one ward". Under the District Council's proposals, based on council size of 47, the revised Selsey North and Selsey South wards

would contain 11 per cent fewer and 8 per cent fewer electors per councillor than the district average respectively (10 per cent and 10 per cent fewer by 2006).

56 We received two further representations in relation to the Selsey area at Stage One. The Liberal Democrats and the Labour Party both expressed support for the District Council's proposals in this area.

57 Having considered the representations received at Stage One, we have decided to adopt the District Council's proposals for Selsey, subject to one minor amendment. We propose amending the boundary between the proposed Selsey North and Selsey South wards to provide for a more clearly identifiable boundary. We propose that Seal County Primary School be transferred to the proposed Selsey South ward, uniting it with East Street from which it is accessed. We considered that the Council's proposals provided for an acceptable balance between electoral equality and the statutory criteria, identifying an appropriate boundary between the two wards which would largely retain whole roads within one ward. We also note that these proposals have received support locally and would also be supported by Selsey Town Council.

58 Under our draft recommendations based on a council size of 48, Selsey North and Selsey South wards would contain 9 per cent and 6 per cent fewer electors per councillor than the district average respectively (8 per cent and 8 per cent fewer by 2006). Our proposals for this area are illustrated on Map 2 and Map A2 in Appendix A.

Birdham, East Wittering and West Wittering wards

59 The existing wards of Birdham, East Wittering and West Wittering are situated in the south of the district, with each of the three wards currently represented by a single councillor. Birdham ward comprises the parishes of Birdham and West Itchenor, East Wittering ward comprises the parishes of East Wittering and Earnley and West Wittering ward is coterminous with the parish of the same name. Under existing arrangements, Birdham, East Wittering and West Wittering wards contain 2 per cent fewer, 115 per cent more and 47 per cent more electors per councillor than the district average respectively (4 per cent fewer, 128 per cent more and 43 per cent more by 2006).

60 At Stage One, the District Council proposed combining the existing Birdham ward with the existing West Wittering ward to form a revised two-member West Wittering ward. It proposed retaining the existing East Wittering ward, but increasing its level of representation from one to two councillors to address the high level of under-representation which currently exists. The Council acknowledged that there are a limited number of alternatives for warding arrangements in this area. With reference to the proposed West Wittering ward, it commented "these three parishes adjoin Chichester Harbour with the consequent restriction on alternatives". Under the District Council's proposals, based on a council size of 47, East Wittering and West Wittering wards would contain 3 per cent and 14 per cent more electors per councillor than the district average respectively (8 per cent and 11 per cent more by 2006).

61 We received three further representations in relation to this area. District Councillor Clay proposed a new three-member The Witterings ward, comprising the parishes of East Wittering and West Wittering, transferring Earnley parish to the neighbouring Sidlesham ward, and resulting in the retention of the existing Birdham ward. She argued that Earnley

shares many rural issues with Sidlesham and there are many links between East and West Wittering. Under Councillor Clay's proposals based on a council size of 47, Birdham, Sidlesham and The Witterings wards would contain 11 per cent fewer, 15 per cent more and 9 per cent more electors per councillor than the district average respectively (12 per cent fewer, 16 per cent more and 11 per cent more by 2006). Finally, the Liberal Democrats and the Labour Party both expressed support for the District Council's proposals in this area.

62 Having considered the representations received at Stage One, we have decided to adopt the District Council's proposals for this area. We have considered the proposals submitted by Councillor Clay, and while we are of the view that they have merit, we have not been persuaded that they would provide for a better balance between electoral equality and the statutory criteria than the District Council's proposals, which had also been the subject of local consultation. We also note that, under Councillor Clay's proposals, based on our proposed council size of 48, Birdham, Sidlesham and The Witterings wards would contain 10 per cent fewer, 18 per cent more and 13 per cent more electors per councillor than the district average respectively by 2006. While we accept that the configuration of parishes and the presence of Chichester Harbour results in limitations on the possible re-warding in this area, we are not of the view that the levels of electoral inequality achieved under Councillor Clay's proposals can be justified.

63 Having based our draft recommendations on a council size of 48 members, the variances under the District Council's proposals (based on a council size of 47) would change, with some marginally deteriorating and some marginally improving. Under our draft recommendations, East Wittering and West Wittering wards would contain 11 per cent and 13 per cent more electors per councillor than the district average respectively by 2006. We have looked at the possibility of improving upon these levels of electoral equality. However, as acknowledged by the District Council, the proposed East and West Wittering wards are bounded in the north by Chichester Harbour and the Chichester Channel, significantly limiting our ability to identify any possible alternatives.

64 Under our draft recommendations, based on a council size of 48, the proposed East Wittering and West Wittering wards would contain 5 per cent and 16 per cent more electors per councillor than the district average respectively (11 per cent and 13 per cent more by 2006). Our proposals for this area are illustrated on Map 2.

Bosham, Donnington and Fishbourne wards

65 The existing wards of Bosham, Donnington and Fishbourne are situated in the south of the district, with all three wards each currently represented by a single councillor. Bosham and Fishbourne wards are coterminous with parishes of the same name, while Donnington ward comprises the parishes of Donnington and Appledram. Under existing arrangements, Bosham, Donnington and Fishbourne wards contain 36 per cent more, 3 per cent more and 3 per cent fewer electors per councillor than the district average respectively (35 per cent, 3 per cent and 1 per cent more by 2006).

66 At Stage One, the District Council proposed retaining the existing Donnington and Fishbourne wards. It proposed combining Bosham ward with Chidham parish from the existing Funtington ward, to form a revised two-member Bosham ward. Again it was noted that there are restrictions on the re-warding of this area due to the constraints of Chichester

Harbour. The remaining part of the existing Funtington ward would form part of a revised Funtington ward, as detailed below. Under the District Council's proposals based on a council size of 47, Bosham, Donnington and Fishbourne wards would contain 9 per cent, 4 per cent and 9 per cent fewer electors per councillor than the district average respectively (11 per cent, 3 per cent and 5 per cent fewer by 2006).

67 We received two further representations in relation to this area at Stage One. The Liberal Democrats and the Labour Party both expressed support for the District Council's proposals in this area.

68 Having considered the representations received at Stage One, we have decided to adopt the District Council's proposals for this area. We consider that these proposals provide for the best balance between electoral equality and the statutory criteria, and are largely based on the existing warding arrangements. We are also of the view that the proposed Bosham ward unites the parishes of Bosham and Chidham which are linked by the A259 (Main Road).

69 Under our draft recommendations, based on a council size of 48, the proposed Bosham, Donnington and Fishbourne wards would contain 7 per cent, 2 per cent and 7 per cent fewer electors per councillor than the district average respectively (9 per cent, 1 per cent, and 3 per cent fewer by 2006). Our proposals for this area are illustrated on Map 2.

Southbourne and Westbourne wards

70 The existing wards of Southbourne and Westbourne are situated in the south-west of the district, bordering the district of East Hampshire. Southbourne is currently represented by three councillors, while Westbourne is currently a single-member ward. Southbourne ward comprises the parishes of Southbourne and West Thorney and Westbourne ward is coterminous with the parish of the same name. Under existing arrangements, Southbourne and Westbourne wards would contain 9 per cent more and 5 per cent fewer electors per councillor than the district average respectively (7 per cent more and 5 per cent fewer by 2006).

71 At Stage One, the District Council proposed retaining the existing Southbourne and Westbourne wards. This proposal was supported by the Liberal Democrats and the Labour Party. Under the District Council's proposals based on a council size of 47, Southbourne and Westbourne wards would contain 1 per cent and 11 per cent fewer electors per councillor than the district average respectively (2 per cent and 10 per cent fewer by 2006).

72 Having considered the representations received at Stage One, we have decided to adopt the District Council's proposals for this area. The proposals would result in the existing warding arrangements being retained and, by basing our proposals on a council size of 48 as opposed to 47, an improved level of electoral equality would be achieved.

73 Under our draft recommendations, based on a council size of 48, the proposed Southbourne and Westbourne wards would contain 1 per cent more and 9 per cent fewer electors per councillor than the district average respectively (equal to the average and 9 per cent fewer by 2006). Our proposals for this area are illustrated on Map 2.

Hunston, Oving and Sidlesham wards

74 The existing wards of Hunston, Oving and Sidlesham are situated in the south-east of the district, bordering the district of Arun. The three wards are currently each represented by a single councillor. Hunston ward comprises the parishes of Hunston and North Mundham, Oving ward comprises the parishes of Oving and Tangmere and Sidlesham ward is coterminous with the parish of the same name. Under existing arrangements, Hunston, Oving and Sidlesham wards contain 4 per cent more, 36 per cent more and 45 per cent fewer electors per councillor than the district average respectively (2 per cent more, 38 per cent more and 47 per cent fewer by 2006).

75 At Stage One, the District Council proposed combining Hunston parish with the existing Sidlesham ward to form a revised single-member Sidlesham ward. The remaining part of the existing Hunston ward, North Mundham parish, would be combined with Oving parish from the existing Oving ward to form a new single-member North Mundham ward. The remaining part of the existing Oving ward, Tangmere parish, would form a new single-member Tangmere ward. Under the District Council's proposals, based on a council size of 47, North Mundham, Sidlesham and Tangmere wards would contain 9 per cent, 2 per cent and 12 per cent fewer electors per councillor than the district average respectively (12 per cent, 3 per cent and 8 per cent fewer by 2006).

76 We received three further representations in relation to this area. District Councillor Clay expressed broad support for the District Council's proposed North Mundham ward. However, she proposed a revised Sidlesham ward as a consequence of her proposals in the Witterings area, as detailed above. The Liberal Democrats and the Labour Party both expressed support for the District Council's proposals in this area.

77 Having considered the representations received at Stage One, we have decided to adopt the District Council's proposals for this area. We note that these proposals have received broad support and unite parishes such as Sidlesham and Hunston which are linked by the B2145 Selsey Road. As detailed earlier, we have not been persuaded to adopt Councillor Clay's proposed Sidlesham ward which, under our proposed council size of 48, would contain 18 per cent more electors per councillor than the district average by 2006. We are not of the view that such a high level of electoral inequality can be justified. Having based our draft recommendations on a council size of 48 members, the variances under the District Council's proposals (based on a council size of 47) would change, with some marginally deteriorating and some marginally improving. Under our draft recommendations North Mundham ward would contain 11 per cent fewer electors per councillor than the district average by 2006. We have looked at the possibility of improving upon this level of electoral inequality, however, due to the configuration of parishes in this area, we have been unable to identify any alternatives which would not have a consequential effect on neighbouring wards.

78 Under our draft recommendations, based on a council size of 48, the proposed North Mundham, Sidlesham and Tangmere wards would contain 7 per cent fewer, equal to the average and 10 per cent fewer electors per councillor than the district average respectively (11 per cent, 1 per cent and 6 per cent fewer by 2006). Our proposals for this area are illustrated on Map 2.

Funtington, Harting and Stoughton wards

79 The existing wards of Funtington, Harting and Stoughton are situated in the west of the district and are each currently represented by a single councillor. Funtington ward comprises the parishes of Chidham and Funtingdon, Harting ward comprises the parishes of Elsted, Harting and Treyford, and Stoughton ward comprises the parishes of Compton, Marden, Stoughton and West Dean. Under existing arrangements, Funtington, Harting and Stoughton wards would contain 18 per cent more, 18 per cent fewer and 31 per cent fewer electors per councillor than the district average respectively (13 per cent more, 22 per cent fewer and 34 per cent fewer by 2006).

80 At Stage One, the District Council proposed combining part of the existing Funtington ward, Chidham parish, with the existing Bosham ward to form a revised two-member Bosham ward, as detailed above. The remaining part of the existing Funtington ward, Funtington parish, would be combined with the parishes of Compton and Stoughton from the existing Stoughton ward to form a revised single-member Funtington ward. Part of the remainder of the existing Stoughton ward, Marden parish, would be combined with the existing Harting ward, together with the parish of Trotton with Chithurst from the existing Rogate ward, to form a revised single-member Harting ward, while the remainder of the existing Stoughton ward, West Dean parish, would form part of a revised single-member Boxgrove ward, as detailed below. Under the District Council's proposals based on a council size of 47, Funtington and Harting wards would contain 11 per cent more and 5 per cent fewer electors per councillor than the district average respectively (6 per cent more and 8 per cent fewer by 2006).

81 We received three further representations in relation to this area. Harting Parish Council broadly supported the Council's proposals in relation to its proposed Harting ward, while the Liberal Democrats and the Labour Party both expressed support for the District Council's proposals in this area.

82 Having considered the representations received at Stage One, we have decided to adopt the District Council's proposals in this area. We note that the proposed Funtington and Harting wards have received an element of support at a local level and we are content to put the proposals forward for consultation. In addition, we are of the view that the District Council's proposed Funtington and Harting wards result in the combining of parishes which we consider to be geographically linked.

83 Under our draft recommendations, based on a council size of 48, the proposed Funtington and Harting wards would contain 13 per cent more and 3 per cent fewer electors per councillor than the district average respectively (8 per cent more and 6 per cent fewer by 2006). Our proposals for this area are illustrated on Map 2.

Boxgrove and Lavant wards

84 The existing wards of Boxgrove and Lavant are situated in the central and eastern part of the district, and are each currently represented by a single councillor. Boxgrove ward comprises the parishes of Boxgrove, Eartham, East Dean, Singleton and Upwaltham, while Lavant ward comprises the parishes of Lavant and Westhampnett. Under existing arrangements, Boxgrove and Lavant wards contain 16 per cent and 5 per cent fewer electors

per councillor than the district average respectively (18 per cent and 3 per cent fewer by 2006).

85 At Stage One, the District Council proposed retaining the existing single-member Lavant ward. It proposed combining the existing Boxgrove ward, with West Dean parish from the existing Stoughton ward, as detailed above, to form a revised single-member Boxgrove ward. Under the District Council's proposals based on a council size of 47, Boxgrove and Lavant wards would contain 5 per cent and 10 per cent fewer electors per councillor than the district average respectively (7 per cent and 9 per cent fewer by 2006).

86 We received three further representations in relation to this area. Westhampnett Parish Council broadly supported the District Council's proposed Lavant ward based on the fact that it "would prefer to be represented by one councillor rather than three", while the Liberal Democrats and the Labour Party both expressed support for the District Council's proposals in this area.

87 Having considered the representations received at Stage One, we have decided to adopt the District Council's proposals for this area. We note that the proposals have received an element of support at a local level and are largely based on the existing warding arrangements. We are also of the view that the inclusion of West Dean in the revised Boxgrove ward would not have an adverse effect on the local community with the parishes of Singleton and West Dean being linked by the A286.

88 Under our draft recommendations, based on a council size of 48, the proposed Boxgrove and Lavant wards would contain 3 per cent and 8 per cent fewer electors per councillor than the district average respectively (5 per cent and 7 per cent fewer by 2006). Our proposals for this area are illustrated on Map 2.

Bury, Graffham and Midhurst wards

89 The existing wards of Bury, Graffham and Midhurst are situated in the central and eastern parts of the district, with Bury and Graffham wards each currently represented by a single councillor and Midhurst ward currently represented by two councillors. Bury ward comprises the parishes of Bury, Bignor, Barlavington, Duncton and Sutton, Graffham ward comprises the parishes of Bepton, Cocking, East Lavington, Graffham and Heyshott and Midhurst ward comprises the parishes of Midhurst and West Lavington. Under existing arrangements, Bury, Graffham and Midhurst wards contain 29 per cent fewer, 16 per cent fewer and 22 per cent more electors per councillor than the district average respectively (32 per cent fewer, 19 per cent fewer and 21 per cent more by 2006).

90 At Stage One, the District Council proposed combining the existing Bury ward with the parishes of East Lavington and Graffham from the existing Graffham ward to form a revised single-member Bury ward. The remainder of the existing Graffham ward, the parishes of Bepton, Cocking and Heyshott, would be combined with part of the existing Midhurst ward, West Lavington parish, together with the parishes of Stedham with Iping and Woolbeding from the existing Stedham ward to form a revised single-member Stedham ward. The remainder of the existing Midhurst ward, Midhurst parish, would form a revised two-member Midhurst ward. Under the District Council's proposals, based on a council size of 47, Bury, Midhurst and Stedham wards would contain equal to the average, 8 per cent more and 6 per

cent more electors per councillor than the district average respectively (4 per cent fewer, 7 per cent more and 1 per cent more by 2006).

91 We received three further representations in relation to this area. West Sussex County Council forwarded comments from County Councillor Waller (Midhurst), who proposed that Midhurst be a separate ward and that Heyshott parish should form part of the proposed Easebourne ward. It was stated that “this adjustment would leave district wards within the boundaries of two existing county electoral divisions”. The Liberal Democrats and the Labour Party both expressed support for the District Council’s proposals in this area.

92 Having considered the representations received at Stage One, we have decided to adopt the District Council’s proposals for this area. We are of the view that the Council’s proposals provide for improved levels of electoral equality while reflecting the identities and interests of the local community. We note the comments made by Councillor Waller. However, we can not pre-empt the potential outcome of our PER of West Sussex County Council’s electoral arrangements, which is scheduled to start later this year.

93 Under our draft recommendations based on a council size of 48, Bury, Midhurst and Stedham wards would contain 2 per cent, 10 per cent and 8 per cent more electors per councillor than the district average respectively (2 per cent fewer, 9 per cent more and 3 per cent more by 2006). Our proposals for this area are illustrated on Map 2.

Fernhurst, Linchmere, Rogate and Stedham wards

94 The existing wards of Fernhurst, Linchmere, Rogate and Stedham are situated in the north of the district, bordering the districts of East Hampshire and Waverley. Fernhurst ward is currently represented by two councillors, while Linchmere, Rogate and Stedham are each currently represented by a single councillor. Fernhurst and Linchmere wards are coterminous with the parishes of the same name. Rogate ward comprises the parishes of Rogate and Trotton with Chithurst and Stedham ward comprises the parishes of Linch, Milland, Woolbeding and Stedham with Iping. Under existing arrangements Fernhurst, Linchmere, Rogate and Stedham wards contain 24 per cent, 25 per cent, 9 per cent and 5 per cent fewer electors per councillor than the district average respectively (27 per cent, 28 per cent, 14 per cent and 10 per cent fewer by 2006).

95 At Stage One, the District Council proposed combining the existing Fernhurst and Linchmere wards to form a revised two-member Fernhurst ward. Part of the existing Rogate ward, the parish of Rogate, would be combined with part of the existing Stedham ward, the parishes of Linch and Milland, to form a revised single-member Rogate ward. The remaining part of the existing Rogate ward, the parish of Trotton with Chithurst would form part of a revised Harting ward, as detailed above, while the remainder of the existing Stedham ward, the parishes of Stedham with Iping and Woolbeding, would form part of a revised Stedham ward, also detailed above. Under the District Council’s proposals based on a council size of 47, Fernhurst and Rogate wards would contain 6 per cent and 14 per cent more electors per councillor than the district average respectively (2 per cent and 8 per cent more by 2006).

96 We received three further representations in relation to this area at Stage One. Harting Parish Council broadly supported the Council’s proposed Rogate ward, while the Liberal

Democrats and the Labour Party both expressed support for the District Council's proposals in this area.

97 Having considered the representations received at Stage One, we have decided to adopt the District Council's proposals subject to one minor amendment. We consider that these proposals have received an element of support at a local level and would appear to combine parishes which share good communication links. However, in order to provide for an improved level of electoral equality for the proposed Rogate ward, we propose transferring Linch parish to the proposed Fernhurst ward. We welcome further views on this amendment at Stage Three.

98 Under our draft recommendations, based on a council size of 48, the proposed Fernhurst and Rogate wards would contain 10 per cent and 14 per cent more electors per councillor than the district average respectively (6 per cent and 8 per cent more by 2006). Our proposals for this area are illustrated on Map 2.

Easebourne, Lodsworth and Petworth wards

99 The existing wards of Easebourne, Lodsworth and Petworth are situated in the north-eastern corner of the district. Easebourne and Lodsworth wards are each currently represented by a single councillor, while Petworth ward is currently represented by two councillors. Easebourne ward is coterminous with the parish of the same name, Lodsworth ward comprises the parishes of Lodsworth, Lurgashall and Tillington and Petworth ward comprises the parishes of Petworth, Ebernoe and Northchapel. Under existing arrangements Easebourne, Lodsworth and Petworth wards contain 19 per cent, 16 per cent and 8 per cent fewer electors per councillor than the district average respectively (21 per cent, 20 per cent and 7 per cent fewer by 2006).

100 At Stage One, the District Council proposed combining the existing Easebourne ward with Lodsworth parish from the existing Lodsworth ward to form a revised single-member Easebourne ward. Part of the remainder of the existing Lodsworth ward, Tillington parish, would be combined with part of the existing Petworth ward, the parishes of Ebernoe and Petworth, together with part of the existing Wisborough Green ward, the parishes of Fittleworth and Stopham, to form a revised two-member Petworth ward. The remainder of the existing Lodsworth ward, Lurgashall parish, and the remainder of the existing Petworth ward, Northchapel parish, would form part of a revised Plaistow ward, together with the parishes of Plaistow and Loxwood from the existing Plaistow ward, as detailed below. Under the District Council's proposals based on a council size of 47, Easebourne and Petworth wards would contain 5 per cent and 4 per cent more electors per councillor than the district average respectively (2 per cent and 5 per cent more by 2006).

101 We received a further six representations in relation to this area. the Liberal Democrats and the Labour Party both expressed support for the District Council's proposals. Easebourne Parish Council "overwhelmingly" objected to any proposal to combine the parish with Midhurst, arguing that "Easebourne may look like an urban suburb of Midhurst, but this is far from being the case". It therefore broadly supported the District Council's proposals which united the parish with Lodsworth with which it argues it has "much more in common". Lurgashall Parish Council expressed opposition to the Council's proposed Plaistow ward, arguing that the Parish Council has long-standing links with the parishes of Northchapel,

Lodsworth and Tillington, with which it was grouped under the Council's original 46-member consultation scheme.

102 Northchapel Parish Council opposed the Council's proposed Plaistow ward, arguing that Northchapel and Ebernoe parishes should form part of the same district ward. It stated that it broadly supported the Council's original proposals for this area under its 46-member consultation scheme, subject to Ebernoe parish being included in the same ward as Northchapel parish. Tillington Parish Council opposed the District Council's proposed Petworth ward and expressed support for the proposals made under the 46-member consultation scheme.

103 Having considered the representations received at Stage One, we have decided to adopt the District Council's proposals for this area. We note that these proposals have received an element of support at a local level and are of the view that they provide for the best balance between electoral equality and the statutory criteria. In relation to the proposals made by the parishes of Lurgashall, Northchapel and Tillington favouring the original proposals made by the District Council for their area, we have been unable to facilitate their proposals due to the consequential effect it would have on surrounding wards. While we note the concerns expressed, we have been unable to identify any alternatives which would meet with the approval of all the parishes in the area, as well as provide for an acceptable level of electoral equality.

104 We noted the comments made by Northchapel parish in relation to the links it has with the parish of Ebernoe. We looked at the possibility of transferring Ebernoe to the proposed Plaistow ward, in order that the parishes of Ebernoe and Northchapel form part of the same ward. This amendment would have a negligible affect on electoral equality. However, as part of the Council's consultation exercise, Ebernoe Parish Council requested that it remain with the parish of Petworth, which would be the case under the Council's proposed Petworth ward. We particularly welcome further views and alternative proposals for this area at Stage Three.

105 Under our draft recommendations, based on a council size of 48, the proposed Easebourne and Petworth wards would contain 7 per cent and 6 per cent more electors per councillor than the district average respectively (4 per cent and 7 per cent more by 2006). Our proposals for this area are illustrated on Map 2.

Plaistow and Wisborough Green wards

106 The existing wards of Plaistow and Wisborough Green are situated in the north-eastern corner of the district. Plaistow ward is currently represented by two councillors and Wisborough Green ward is currently represented by a single councillor. Plaistow ward comprises the parishes of Kirdford, Loxwood and Plaistow, and Wisborough Green ward comprises the parishes of Fittleworth, Stopham and Wisborough Green. Under existing arrangements Plaistow and Wisborough Green wards contain equal to the average and 17 per cent more electors per councillor than the district average respectively (2 per cent fewer and 12 per cent more by 2006).

107 At Stage One, the District Council proposed combining part of the existing Plaistow ward, the parishes of Loxwood and Plaistow, with Lurgashall parish from the existing Lodsworth ward and Northchapel parish from the existing Petworth ward, to form a revised

two-member Plaistow ward, as detailed above. The remainder of the existing Plaistow ward, Kirdford parish, would be combined with Wisborough Green parish from the existing Wisborough Green ward to form a revised single-member Wisborough Green ward. The remainder of the existing Wisborough Green ward, the parishes of Fittleworth and Stopham would form part of a revised Petworth ward, as detailed above. Under the District Council's proposals, Plaistow and Wisborough Green wards would contain 3 per cent and 6 per cent more electors per councillor than the district average respectively (equal to the average and 1 per cent more by 2006).

108 We received a further five representations in relation to this area. The Liberal Democrats and the Labour Party both expressed support for the District Council's proposals in this area. Wisborough Green Parish Council broadly supported the District Council's proposed Wisborough Green ward, stating that it has similar issues to Kirdford parish, with which it would be combined within the Council's proposed single-member ward. As detailed above, Lurgashall Parish Council expressed opposition to the Council's proposed Plaistow ward, arguing that the Parish Council has "long-established links" with the parishes of Northchapel, Lodsworth and Tillington, with which it was grouped under the Council's original 46-member consultation scheme. Northchapel Parish Council opposed the Council's proposed Plaistow ward, arguing that Northchapel and Ebernoe parishes should form part of the same district ward. It stated that it broadly supported the Council's original proposals for this area under its 46-member consultation scheme, subject to Ebernoe parish being included in the same ward as Northchapel parish.

109 Having considered the representations received at Stage One, we have decided to adopt the District Council's proposals in this area. We consider that these proposals have received an element of support at a local level as well as providing for much improved levels of electoral equality. As detailed above, we note the concerns expressed by Lurgashall, Northchapel and Tillington parishes, but we have been unable to identify any alternatives which would meet with the approval of all the parishes in the area, as well as provide for an acceptable level of electoral equality. We would, however, particularly welcome further views and alternative proposals for this area at Stage Three.

110 Under our draft recommendations based on a council size of 48, the proposed Plaistow and Wisborough Green wards would contain 5 per cent and 8 per cent more electors per councillor than the district average respectively (2 per cent and 4 per cent more by 2006). Our proposals for this area are illustrated on Map 2.

Electoral Cycle

111 We received one response regarding the District Council's electoral cycle. The District Council itself stated that "The proposal that this Council wishes to make is that we retain the present system of whole-council elections every four years".

112 We considered carefully the representation received. At present, the majority view appears to be that the present electoral cycle should be retained and we therefore propose no change.

Conclusions

113 Having considered all the evidence and submissions received during the first stage of the review, we propose that:

- there should be a reduction in council size from 50 to 48;
- there should be 29 wards;
- the boundaries of 28 of the existing wards should be modified, resulting in a net reduction of five, and six wards should retain their existing boundaries;
- elections should continue to be held for the whole council.

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

- we propose that the Council should comprise 48 councillors, rather than 47 as proposed by the District Council;
- in Chichester City we propose adopting the Liberal Democrats' proposals, based on 11 councillors representing the city overall with one minor boundary amendment;
- we propose a minor amendment between the proposed Selsey North and Selsey South wards to provide for a more clearly identifiable boundary;
- we propose that Linch parish form part of a revised Fernhurst ward to provide for an improved level of electoral equality.

115 Table 5 shows how our draft recommendations will effect electoral equality, comparing them with the current arrangements (based on 2001 electorate figures) and with forecast electorates for the year 2006.

Table 5: Comparison of Current and Recommended Electoral Arrangements

	2001 electorate		2006 forecast electorate	
	Current arrangements	Draft recommendations	Current arrangements	Draft recommendations
Number of councillors	50	48	50	48
Number of wards	34	29	34	29
Average number of electors per councillor	1,685	1,755	1,786	1,861
Number of wards with a variance more than 10 per cent from the average	20	4	21	3
Number of wards with a variance more than 20 per cent from the average	11	0	13	0

116 As shown in Table 5, our draft recommendations for Chichester District Council would result in a reduction in the number of wards with an electoral variance of more than 10 per cent from the district average from 20 to four. By 2006 only three wards, East Wittering, North Mundham and West Wittering, are forecast to have an electoral variance of more than 10 per cent.

Draft Recommendation

Chichester District Council should comprise 48 councillors serving 29 wards, as detailed and named in Tables 1 and 2, and illustrated on Map 2 and in Appendix A, including the large map inside the back cover. The Council should continue to hold whole-council elections every four years.

Parish and Town Council Electoral Arrangements

117 When reviewing electoral arrangements, we are required to comply as far as possible with the rules set out in Schedule 11 to the 1972 Act. The Schedule states that if a parish is to be divided between different district wards it must also be divided into parish wards, so that each parish ward lies wholly within a single ward of the district. Accordingly, we propose consequential warding arrangements for Chichester City Council Selsey Town Council to reflect the proposed district wards.

118 Chichester City Council is currently served by 20 councillors representing four wards: East, North, South and West, each currently returning five councillors. At Stage One, the District Council, the Liberal Democrats and Chichester City Council proposed alternative warding arrangements for the City, although, as detailed earlier, the proposals from Chichester City Council were incomplete and could therefore not be fully taken into account. As discussed previously, to determine the most appropriate council size for the district as a whole, we considered the allocation of councillors between the Chichester City, Selsey and rural parts of the district. We concluded that the most appropriate council size for Chichester District Council is 48, allocating 11 councillors to the Chichester City area. We were

therefore unable to facilitate the schemes proposed for the City by the District Council and the City Council who proposed allocating the city 10 and 12 councillors respectively, as opposed to the 11 of which it would be entitled to under a council size of 48 by 2006.

119 As part of our draft recommendations, we have therefore proposed adopting the Liberal Democrats' revised Chichester East, Chichester North, Chichester South and Chichester West district wards, subject to a minor boundary amendment between the proposed Chichester East and Chichester North wards. As a consequence of our draft recommendations, we propose creating revised East, North, South and West wards of Chichester City Council to reflect the proposed district wards. We propose that each of the revised wards should retain five councillors.

Draft Recommendation

Chichester City Council should comprise 20 councillors, as at present, representing four wards: East ward, North ward, South ward and West ward, each returning five councillors. The parish ward boundaries should reflect the proposed district ward boundaries in the area, as illustrated and named on Map 2 and on the large map at the back of the report.

120 Selsey Town Council is currently served by 14 councillors representing two wards: North and South, each currently returning seven councillors. At Stage One, the District Council proposed revised Selsey North and Selsey South district wards, increasing the level of representation for the town from four to five to facilitate the correct allocation of councillors. It stated that this increase would "necessitate a revision of the existing wards". As part of our draft recommendations, we have proposed adopting the District Council's proposals for Selsey, subject to a minor amendment between the two wards. As a consequence of our draft recommendations, we propose creating new North and South wards of Selsey town to reflect the proposed district ward boundary. We propose that both of the revised wards should continue to be represented by seven councillors as requested by the District Council. However, we note that a better allocation of councillors between the two wards would result in North ward returning eight councillors and South ward returning six councillors and we welcome the Town Council's views on this issue at Stage Three.

Draft Recommendation

Selsey Town Council should comprise 14 councillors, as at present, representing two wards: North and South, each returning seven councillors. The boundary between the two parish wards should reflect the proposed district ward boundary, as illustrated and named on Map A2 in Appendix A.

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

Draft Recommendation

Parish and town council elections should continue to take place every four years, at the same time as elections for the district ward of which they are part.

Map 2: Draft Recommendations for Chichester

5 WHAT HAPPENS NEXT?

122 There will now be a consultation period, during which everyone is invited to comment on the draft recommendations on future electoral arrangements for Chichester contained in this report. We will take fully into account all submissions received by 22 April 2002. Any received *after* this date may not be taken into account. All responses may be inspected at our offices and those of the District Council. A list of respondents will be available from us on request after the end of the consultation period.

123 Express your views by writing directly to us:

Review Manager
Chichester 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

124 In the light of responses 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 Electoral Commission. After the publication of our final recommendations, all further correspondence should be sent to the Electoral Commission, which cannot make the Order giving effect to our recommendations until six weeks after it receives them.

APPENDIX A

Draft Recommendations for Chichester: Detailed Mapping

The following maps illustrate our proposed ward boundaries for the Chichester area.

Map A1 illustrates, in outline form, the proposed ward boundaries within the district and indicates the areas which are shown in more detail on Map A2 and the large map at the back of this report.

Map A2 illustrates the proposed boundary between Selsey North and Selsey South wards.

The **large map** inserted at the back of this report illustrates the existing and proposed warding arrangements for the Chichester City area.

Map A1: Draft Recommendations for Chichester: Key Map

Map A2: Proposed boundary between Selsey North and Selsey South wards

Appendix B

Code of Practice on Written Consultation

The Cabinet Office's November 2000 *Code of Practice on Written Consultation*, www.cabinet-office.gov.uk/servicefirst/index/consultation.htm, requires all Government Departments and Agencies to adhere to certain criteria, set out below, on the conduct of public consultations. Non-Departmental Public Bodies, such as the Local Government Commission for England, 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.

Table B1: LGCE 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.	We comply with this requirement.
It should be clear who is being consulted, about what questions, in what timescale and for what purpose.	We comply 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.	We comply 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.	We comply 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.	We consult 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.	We comply with this requirement.
Departments should monitor and evaluate consultations, designating a consultation coordinator who will ensure the lessons are disseminated.	We comply with this requirement.