

WORCESTERSHIRE COUNTY ASSOCIATION OF LOCAL COUNCILS



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To: Max Caller CBE
Chair, Local Government Boundary Commission for England
Layden House
76-86 Turnmill Street
London
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Bromsgrove Electoral Review – Comments on the review process to date

Dear Chairman

I am writing on behalf of the Bromsgrove Area meeting of the Worcestershire County Association of Local Councils about the Local Government Boundary Commission's approach to and conduct of the review of Bromsgrove District Council's (BDC) electoral arrangements. This is with particular regard to your proposals for new Ward boundaries. Many Parish Councils in Bromsgrove District are voicing concerns about the review process and this was confirmed in majority vote at our March 2013 meeting.

Our comments below apply to the review process to-date as your final recommendations are scheduled to appear in June 2013.

We know the Commission's task has two main parts – to review Bromsgrove's electoral arrangements to achieve single member wards across the District, and to recommend ward boundaries which provide for each District Councillor to represent approximately the same number of electors, which we support.

You have told us the Commission in proposing new ward boundaries and looking at electoral numbers, also has to consider the interests and identity of local communities as well as ensuring new electoral arrangements promote effective and convenient local government.

We appreciate this is complex work. It is particularly so in the light of changing population numbers associated with housing developments in coming years, and the meaning of community and attachments to it as experienced every day by Bromsgrove residents and in particular, those where there is a distinct Parish



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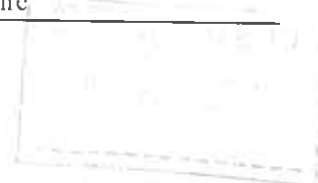
identity. But to get to the real meaning of community suggests more than reliance on a one-way supply of comments from our local level to the Commission. A two-way exchange would be more applicable for seeking further information or giving explanation of why certain of our local proposals are not feasible. Even more helpful would be an on-site meeting, with your staff conducting an open floor hearing with local bodies like Parish Councils and members of the public who register to make presentations. This will increase the time requirement of a review but this is an age where participation is expected and could add value to the Commission's decision taking. Importantly it conveys that the Commission's process is much more than a numbers exercise around electoral equalisation.

Several Parish Councils responded to your invitation to comment on the Bromsgrove draft recommendations as part of the full public consultation issued on 13 November 2012 and concluding on 7 January 2013. They offered alternative warding arrangements and as required in the Commission's guidance, these were local views backed up by demonstrable evidence. (We read that the Commission takes consultation very seriously, wanting all those interested in the review to provide views and evidence, whether or not they agree with the draft proposal.) This full public consultation was followed on 26 February 2013 by the Commission announcing a further limited consultation (closing 8 April) for certain wards outside of Bromsgrove town to the north and west which include parished areas.

For those parishes affected by the 26 February limited consultation there are quite significant changes in the new electoral ward proposals with real consequences for parish identities. These latest proposals are presented without a sufficient evidence base upon which the Commission asserts its work is founded. It needs to be stressed that some of these changes greatly impact on Parish Councils that, on receipt of the 13 November 2012 draft recommendations, had judged the district ward boundary proposals relating to them introduced little or no change. As such they refrained from making comment.

These Parish Councils know of the critical reaction to your November draft recommendations from individual Bromsgrove residents, including their parishioners. They do not consider it is best practice now to introduce changes on the nature and scale of your latest proposals to create different electoral boundaries and with a short time for informed response. Even so in the time available they will work to review your proposals and provide an evidence base to support any revisions they offer more attuned to recognising local identity and promoting effective local government.

For those Parish Councils not connected to this limited consultation, they remain unclear about your intentions towards their evidence-based alternative ward boundary proposals suggested at the full public consultation stage. With no commentary or even brief feedback so far on these, there is concern to know if the alternative proposals are being disregarded. They see the Commission's practice on consultation and response as somewhat underdeveloped for current times.



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Although we recognise that Bromsgrove Council's actions prior to requesting the review are outside of your remit, we were surprised that BDC asked the Commission to conduct a review without any prior discussion with the 19 Parish Councils in its District on such key matters as electoral representation and ward boundary changes. Under the terms of the Parish Charter with Bromsgrove DC we might have expected prior notice.

The Area Meeting view on behalf of Parish Councils in summary is that the Commission's work so far in Bromsgrove tends towards a striving for electoral equality that dominates its considerations, rather than giving due recognition to the local perspective on community identity and its connection with effective local government. , We do not sense "striking the best balance" is where the Commission's draft recommendations for electoral wards are currently pointing.

Yours Faithfully



Sue Baxter
Chairman
Bromsgrove Area Committee, Worcestershire CALC

cc: Sir Tony Redmond, Commissioner,
William Morrison, Review Officer,
Kevin Dicks, Chief Executive, Bromsgrove District Council,
Bromsgrove Parish Councils.
Richard Levett, Executive Officer Worcestershire CALC

