

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

February 2002

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A large map illustrating the existing and proposed ward boundaries for Adur 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 councils.

With effect from 1 April 2002, subject to Parliamentary approval, 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 Adur'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 Adur:

- **in five of the 14 wards the number of electors represented by each councillor varies by more than 10 per cent from the average for the district and three wards vary by more than 20 per cent;**
- **by 2006 this situation is expected to continue with the number of electors per councillor forecast to vary by more than 10 per cent from the average in five wards and by more than 20 per cent in two wards.**

Our main proposals for Adur's future electoral arrangements (see Tables 1 and 2 and paragraphs 71 – 72) are that:

- **Adur District Council should have 29 councillors, 10 fewer than at present;**
- **there should be 15 wards, instead of 14 as at present;**
- **the boundaries of 13 of the existing wards should be modified, resulting in a net increase of one, and one ward should retain its existing boundaries;**
- **elections should continue to take place by thirds.**

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 all of the proposed 15 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 all wards expected to vary by no more than 4 per cent from the average for the district in 2006.**

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

- **revised warding arrangements and the redistribution of councillors for the parishes of Lancing and Sompting.**

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, subject to Parliamentary approval, 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:

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Adur Review
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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
1	Buckingham	2	part of Buckingham ward; part of Hillside ward
2	Churchill	2	part of Lancing parish (the proposed Churchill parish ward)
3	Cokeham	2	part of Sompting parish (the proposed Cokeham North and Cokeham South parish wards)
4	Eastbrook	2	part of Eastbrook ward
5	Hillside	2	part of Buckingham ward; part of Hillside ward
6	Manor	2	Coombes parish; part of Lancing parish (the proposed Manor parish ward)
7	Marine	2	<i>Unchanged</i>
8	Mash Barn	2	part of Lancing parish (the proposed Mash Barn parish ward)
9	Peverel	2	part of Sompting parish (the proposed Peverel North and Peverel South parish wards)
10	St Mary's	2	part of St Mary's ward; part of St Nicolas ward; part of Southlands ward; part of Southwick Green ward
11	St Nicolas	2	part of Buckingham ward; part of St Mary's ward; part of St Nicolas ward
12	South Lancing	2	part of Lancing parish (the proposed South Lancing parish ward)
13	Southlands	2	part of Southlands ward; part of Southwick Green ward
14	Southwick Green	2	part of Eastbrook ward; part of Southlands ward; part of Southwick Green ward
15	Widewater	1	part of Lancing parish (the proposed Widewater parish ward)

Notes: 1 The district contains three parishes: Coombes, Lancing and Sompting. The remainder of the district is unparished.

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

Table 2: Draft Recommendations for Adur

	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	Buckingham	2	3,243	1,622	0	3,348	1,674	1
2	Churchill	2	3,207	1,604	-1	3,213	1,607	-3
3	Cokeham	2	3,345	1,673	4	3,327	1,664	0
4	Eastbrook	2	3,238	1,619	0	3,228	1,614	-3
5	Hillside	2	3,412	1,706	6	3,351	1,676	1
6	Manor	2	3,221	1,611	0	3,251	1,626	-2
7	Marine	2	2,911	1,456	-10	3,421	1,711	3
8	Mash Barn	2	3,155	1,578	-2	3,188	1,594	-4
9	Peveler	2	3,353	1,677	4	3,407	1,704	2
10	St Mary's	2	2,944	1,472	-9	3,271	1,636	-2
11	St Nicolas	2	3,065	1,533	-5	3,367	1,684	1
12	South Lancing	2	3,357	1,679	4	3,354	1,677	1
13	Southlands	2	3,322	1,661	3	3,412	1,706	3
14	Southwick Green	2	3,424	1,712	6	3,382	1,691	2
15	Widewater	1	1,606	1,606	0	1,726	1,726	4
	Totals	29	46,803	-	-	48,246	-	-
	Averages	-	-	1,614	-	-	1,664	-

Source: Electorate figures are based on information provided by Adur 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. Figures have been rounded to the nearest whole number.

1 INTRODUCTION

1 This report contains our proposals for the electoral arrangements for the district of Adur 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 Adur. Adur's last review was carried out by our predecessor, the Local Government Boundary Commission (LGBC), which reported to the Secretary of State in September 1977 (Report no. 251). 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 the 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 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 Adur District Council inviting proposals for future electoral arrangements. We also notified West Sussex County Council, West Sussex Police Authority, the local authority associations, West Sussex Association of Local Councils, 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 Adur 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 Adur is situated on the south coast in the south-eastern corner of West Sussex county. It has a light industrial character and there are both sea and air ports located in Shoreham. There are four residential centres: Lancing, Shoreham-by-Sea, Southwick and Sompting. To the north of the district are areas of open parkland and farmland stretching on towards the South Downs.

16 The district contains three civil parishes, but Shoreham-by-Sea and Southwick are unparished. The parishes of Coombes, Lancing and Sompting comprise 45 per cent of the district's total electorate with the unparished area comprising the remainder.

17 The electorate of the district is 46,803 (February 2001). The Council presently has 39 members who are elected from 14 wards. Twelve of the wards are each represented by three councillors, one is represented by two councillors and there is one single-member ward. The Council is elected by thirds.

18 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'.

19 At present, each councillor represents an average of 1,200 electors, which the District Council forecasts will increase to 1,237 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 five of the 14 wards varies by more than 10 per cent from the district average, three wards by more than 20 per cent and one ward by more than 30 per cent. The worst imbalance is in St Mary's ward where the councillor represents 31 per cent fewer electors than the district average.

Map 1: Existing Wards in Adur

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	Buckingham	3	3,944	1,315	10	4,043	1,348	9
2	Churchill	3	3,798	1,266	5	3,809	1,270	3
3	Cokeham	3	3,535	1,178	-2	3,515	1,172	-5
4	Eastbrook	3	3,477	1,159	-3	3,474	1,158	-6
5	Hillside	3	3,412	1,137	-5	3,351	1,117	-10
6	Manor	3	3,338	1,113	-7	3,368	1,123	-9
7	Marine	2	2,911	1,456	21	3,421	1,711	38
8	Mash Barn	3	2,877	959	-20	2,910	970	-22
9	Peveler	3	3,163	1,054	-12	3,219	1,073	-13
10	St Mary's	1	830	830	-31	1,095	1,095	-11
11	St Nicolas	3	3,862	1,287	7	3,928	1,309	6
12	Southlands	3	3,300	1,100	-8	3,669	1,223	-1
13	Southwick Green	3	3,823	1,274	6	3,781	1,260	2
14	Widewater	3	4,533	1,511	26	4,663	1,554	26
	Totals	39	46,803	–	–	48,246	–	–
	Averages	–	–	1,200	–	–	1,237	–

Source: Electorate figures are based on information provided by Adur 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 St Mary's ward were relatively over-represented by 31 per cent, while electors in Widewater ward were relatively under-represented by 26 per cent. Figures have been rounded to the nearest whole number.

3 SUBMISSIONS RECEIVED

20 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 Adur District Council and its constituent parish councils.

21 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 four submissions during Stage One, including district-wide schemes from the District Council and the Conservative Independent Alliance, all of which may be inspected at our offices and those of the District Council.

Adur District Council

22 The District Council proposed a council of 28 members, 11 fewer than at present, serving 14 two-member wards. The Council put forward arguments for a reduction in council size based on the new political management structure, the role of councillors and the desire to retain “ward areas, which are small enough to reflect local characteristics and communities”. It proposed modifications to the boundaries of 12 of the existing 14 wards, with only Hillside and Marine wards retaining their existing boundaries. All wards would have an electoral variance below 10 per cent by 2006 under its proposals. The District Council also requested the introduction of biennial elections.

West Sussex County Council

23 The County Council stated that “a pattern of 15 two-member wards would offer the basis for coterminosity” when the County Council electoral arrangements are reviewed. It also made comments on the District Council’s proposals on the west side of Adur River.

Political Groups

24 The Conservative Independent Alliance proposed a council of 30 members, nine fewer than at present, serving 15 two-member wards. The Conservative Independent Alliance broadly supported the District Council’s reduction in council size. However, it stated that a council size of 30 would provide the best levels of electoral equality in Marine ward at a midpoint between 2001 and 2006. It proposed the retention of the existing boundaries of Marine ward but proposed that all other wards should undergo boundary modifications, including a ward which straddled the parish boundary between Lancing and Sompting. Under the Conservative Independent Alliance’s proposals all wards would have an electoral variance below 10 per cent by 2006.

25 The East Worthing & Shoreham Conservative Association supported the proposals put forward by the Conservative Independent Alliance. It also stated that it wished to see the introduction of biennial elections.

4 ANALYSIS AND DRAFT RECOMMENDATIONS

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

27 As described earlier, our primary aim in considering the most appropriate electoral arrangements for Adur 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”.

28 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.

29 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.

30 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

31 Since 1975 there has been a 5 per cent increase in the electorate of Adur district. The District Council submitted electorate forecasts for the year 2006, projecting an increase in the electorate of approximately 3 per cent from 46,803 to 48,246 over the five-year period from 2001 to 2006. It expects most of the growth to be in Marine and St Mary’s wards. 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.

32 At Stage One the Conservative Independent Alliance stated that the 2006 electorate for Adur would be 48,107, 139 electors fewer than the District Council stated. This electorate projection was supported by the East Worthing & Shoreham Conservative Association. However, the Conservative Independent Alliance did not outline where their electorate projections differed from the District Council’s and provided us with no evidence to support this alternative electorate forecast. We contacted Adur District Council regarding this

alternative electorate projection, it confirmed that it remained confident its electorate forecasts were the best estimate currently available.

33 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. We would welcome further evidence on electorate forecasts during Stage Three.

Council Size

34 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.

35 Adur District Council presently has 39 members. The District Council proposed a council of 28 members which it argued "would have enough members to carry out its business". It briefly outlined a new committee structure and noted that it could "increase allowances at no additional cost to the Council, or make modest savings". The Conservative Independent Alliance broadly supported the District Council's proposal for a reduced council size. However, it proposed a council size of 30 in order to provide improved electoral equality in a number of wards between 2001 and 2006. This proposal was supported by the East Worthing & Shoreham Conservative Association.

36 We will not generally seek a substantial increase or decrease in council size but we are prepared to consider the case for change where there is persuasive evidence. Consequently, at the end of Stage One we wrote to Adur District Council, the Conservative Independent Alliance and the East Worthing & Shoreham Conservative Association requesting further evidence in support of their proposed council sizes. Adur District Council and the Conservative Independent Alliance both provided us with further argumentation. The District Council outlined its proposed new committee structure in more detail. It illustrated how a reduction in council size would assist them in facilitating the new political management structure which had recently been adopted and allow the retention of "ward areas, which are small enough to reflect local characteristics and communities". The Conservative Independent Alliance also made comments on the new political management structure and changes to the committee system. However, its main argument for a reduction in council size was to facilitate the best available electoral arrangements for Marine ward. We do not propose adopting the Conservative Independent Alliance proposal for a council size of 30 as we do not consider a council size should be determined by the electoral arrangements of one ward, especially as the electoral equality of Marine ward is better under the District Council's proposals by 2006.

37 We considered the further argumentation received from the District Council for a council size of 28 and were pleased to note that the District Council had given serious consideration to the implications of such a significant reduction. In particular, it provided us with argumentation that, given the current role of councillors, the existing council size of 39 could not be justified. We have noted that Adur District Council has given the necessary consideration to the internal political management, the role of councillors and the implications both for the council and for residents in the proposed new structure which would result from such a significant decrease in council size to 28. We have also noted that although the Conservative Independent Alliance and East Worthing & Shoreham Conservative Association propose a council size of 30 they are both in favour of a significant reduction. We are therefore proposing a significant decrease in council size. However, we noted that under a

council size of 28 it is not possible to provide the correct allocation of councillors between the three areas of Lancing, Sompting and the unparished east of the district on the basis of electorate forecasts for 2006. Consequently, we considered a council size of 29 members, which would provide the correct allocation of councillors between the three different areas, while also securing a better level of electoral equality throughout the district than under a 28-member council.

38 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 29 members.

Electoral Arrangements

39 At Stage One Adur District Council and the Conservative Independent Alliance both wished to retain the district ward boundary between Lancing parish and the unparished part of the district, as they did not wish to include parished and unparished areas in the same ward. We have developed our draft recommendations with this in mind. Having decided on a council size of 29 and given the desire to retain the Lancing parish boundary as a ward boundary, our next objective was to allocate the correct number of councillors across the district. Under the District Council's proposals for a council size of 28 it allocated four councillors to Sompting, eight councillors to Coombes and Lancing and 16 councillors to the unparished part of the district. By 2006, under a council size of 28, with a councillor:elector ratio of 1:1,723, these three areas would be entitled to 3.9 (rounded up to 4) councillors, 8.56 (rounded up to 9) councillors and 15.53 (rounded up to 16) councillors respectively. These entitlements total 29 and consequently it is not possible to provide the correct allocation of councillors under a council size of 28 without breaching the Lancing parish boundary. Having decided on a council size of 29 and acknowledging that the district ward boundary between Lancing parish and the unparished area should be retained, we have been unable to put forward a uniform pattern of two-member wards across the district, as proposed by both the District Council and the Conservative Independent Alliance. We have had to allocate nine district councillors to Coombe and Lancing parishes and, consequently, have proposed the creation of a single-member Widewater ward with four two-member wards in this area, as detailed later in the chapter.

40 West Sussex County Council made comments on the District Council's proposals especially relating to the west of the district. It stated that if "the County PER were to result in there being five county electoral divisions in Adur a pattern of 15 two-member wards would offer the basis for coterminosity". The Commission's approach in two-tier county areas is first to review the electoral arrangements of the district council and then, once the necessary electoral change orders have been made for the districts, review those of the county council. Our future recommendations for electoral division boundaries in all counties, including West Sussex, will utilise the new district wards as building blocks. We therefore cannot have any regard for existing or future county council divisions during this review.

41 Having decided to propose a council size of 29 we have been unable to adopt either the District Council's or the Conservative Independent Alliance's proposals in their entirety. However, due to the fact that the councillor:elector ratios in 2006 under a council size of 29 (1:1,664) is close to that under a council size of 28 or 30 (1:1,723 and 1:1,604 respectively) we have been able to adopt some of the District Council's and Conservative Independent

Alliance's proposed wards. For district warding purposes, the following areas, based on existing wards, are considered in turn:

- (a) Eastbrook, Hillside and Southwick Green wards;
- (b) Buckingham, Marine, St Mary's, St Nicolas and Southlands wards;
- (c) Churchill, Manor, Mash Barn and Widewater wards;
- (d) Cokeham and Peverel wards.

42 Details of our draft recommendations 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.

Eastbrook, Hillside and Southwick Green wards

43 Eastbrook and Southwick Green wards are situated in Southwick, while Hillside ward covers part of Southwick as well as a large rural part of the South Downs. These wards are situated to the east of the district and all three wards each return three councillors. Under the existing arrangements Eastbrook and Hillside wards have councillor:elector ratios 3 per cent and 5 per cent below the district average respectively (6 per cent and 10 per cent by 2006). Southwick Green ward has a councillor:elector ratio 6 per cent above the district average (2 per cent by 2006).

44 Adur District Council proposed that all three of these wards should return two councillors each. It proposed retaining the existing boundaries of Hillside ward. The Council proposed transferring those electors to the south of Kings Manor School and west of Kingston Lane, currently in Southwick Green ward, into a new Kings Manor ward. It proposed that the remainder of the existing Southwick Green ward should form a revised Southwick Green ward with those electors, currently in Eastbrook ward, to the west of Southwick Road, north of The Twitten and west of Twitten Close and Watling Close and north of the Brighton to Shoreham railway. The Council proposed no further modifications to the boundaries of Eastbrook ward.

45 The Conservative Independent Alliance proposed that all three of these wards should return two councillors each and that all three wards should have their boundaries amended to provide better levels of electoral equality. It put forward minor boundary modifications to Eastbrook and Hillside wards, proposing that those electors, currently in Hillside ward, situated on the northern side of Old Shoreham Road should be transferred into Eastbrook ward. It proposed transferring the Butts Road area from Eastbrook ward into Southwick Green ward. It also proposed transferring those electors, currently in Southwick Green ward, situated to the west of Kingston Lane and north of Rectory Road into a revised Southlands ward. These proposals were supported in full by the East Worthing & Shoreham Conservative Association.

46 We carefully considered the representations received at Stage One concerning these three wards. We propose including those electors, currently in Southwick Green ward, west of Kingston Lane and north of Kings Manor School in Southlands ward, as proposed by the Conservative Independent Alliance. However, we propose retaining those electors between Rectory Road and Kings Manor School in Southwick Green as we consider that the Conservative Independent Alliance's proposal to use Rectory Road as a boundary would divide an established housing estate and provide a weak boundary. We propose including in Southwick Green ward those electors, currently in Southlands ward, in Chiltern Close, St Julians Close and numbers 159–193 Middle Road. These electors have good access into

Southwick Green ward along Stoney Lane, and this modification would provide much improved electoral equality in both Southlands and Southwick Green wards. We are basing our proposed Eastbrook ward on the District Council's proposals with one minor modification. We propose utilising Southwick Street as its western boundary from Old Shoreham Road to the Brighton to Shoreham railway line. We consider that this proposal will provide a much clearer boundary while providing effective and convenient local government for the electors directly north of Southwick railway station. We have decided to adopt the District Council's proposal to retain Old Shoreham Road as Hillside ward's southern boundary. However, we propose modifying the boundary between Hillside and Buckingham wards tying it to firm ground detail. This modification does not affect any electors.

47 Under our draft recommendations Eastbrook ward would have a councillor:elector ratio equal to the district average (3 per cent below by 2006). Hillside and Southwick Green wards would both have a councillor:elector ratio 6 per cent above the district average (1 per cent and 2 per cent respectively by 2006). Our draft proposals are illustrated on Map 2 and the large map at the back of the report.

Buckingham, Marine, St Mary's, St Nicolas and Southlands wards

48 The wards of Marine, St Mary's, St Nicolas and Southlands are situated in Shoreham-by-Sea. Buckingham ward covers part of Shoreham-by-Sea as well as a large rural part of the South Downs. These five wards are situated in the centre of the district and under the existing arrangements Buckingham, St Nicolas and Southlands wards each return three councillors, Marine ward returns two councillors and St Mary's ward returns a single councillor. The wards of Buckingham, Marine and St Nicolas have councillor:elector ratios 10 per cent, 21 per cent and 7 per cent above the district average respectively (9 per cent, 38 per cent and 6 per cent by 2006). St Mary's and Southlands wards have councillor:elector ratios 31 per cent and 8 per cent below the district average respectively (11 per cent and 1 per cent by 2006).

49 At Stage One Adur District Council stated that all five wards should return two councillors each. It proposed that the boundaries of Marine ward should remain unchanged as they are "constrained in the west by the need to avoid having parished and unparished areas in [the same] ward, and on all other boundaries by the river and the sea". The District Council stated that its "first step was the need to achieve a reduction in the number of voters in Buckingham [ward]... progressively drawing boundaries east across the district to achieve wards which will work numerically". The Council proposed transferring those electors currently in Buckingham ward, to the east of Fennel Walk and Tarragon Way, into a new Kings Manor ward. It also proposed transferring those electors south of Erringham Road, The Street and Lesser Foxholes, currently in Buckingham ward, into a new St Nicolas & St Mary's ward with those electors to the west of Mill Lane and Brunswick Road, currently in St Nicolas ward; and those electors west of Humphrey's Gap, currently in St Mary's ward. The Council proposed a modified Southlands ward comprising the remainder of St Mary's and St Nicolas wards and those electors to the west of Hammy Lane, Glebelands Day Care Centre and Kingsland House currently in the existing Southlands ward. The remainder of Southlands ward would form a new Kings Manor ward with those electors transferred from Buckingham ward and those electors to the south of Kings Manor School and west of Kingston Lane, currently in Southwick Green ward.

50 The Conservative Independent Alliance stated that all five wards should return two councillors each. It proposed that the boundaries of Marine ward should remain unchanged as the ward "stands alone, bounded by the sea and the river, only touching another ward at a

parish boundary and having only one point of entry". It proposed transferring into a revised St Nicolas ward those electors of Buckingham ward, south of The Avenue, Erringham Road, The Street and Lesser Foxholes and west of Downsway, together with those electors to the west of Buckingham Road currently in the existing St Nicolas ward. The Conservative Independent Alliance proposed that a revised St Mary's ward be created, comprising the current St Mary's ward, the remainder of the existing St Nicolas ward, and the electors currently in Southlands ward, situated south of Southlands General Hospital, west of the rear of the properties on Crown Road, south of Middle Road up to and including Kingsland Close. It proposed that the remainder of the existing Southlands ward should form a revised Southlands ward with those electors, currently in Southwick Green ward, situated to the west of Kingston Lane and north of Rectory Road. These proposals were supported in full by the East Worthing & Shoreham Conservative Association.

51 We have carefully considered the proposals put forward for these five wards during Stage One. We have noted that there are a number of similarities between the District Council's and the Conservative Independent Alliance's proposals and that both have used Buckingham ward as the starting point for generating proposals in this area. We note that Buckingham ward currently has too many electors and consequently the need to transfer electors into neighbouring wards, which will involve creating a ward which spans the Upper Shoreham Road. We have noted that the District Council proposed crossing the Upper Shoreham Road in both the extreme east and west corners of the ward. However, the Conservative Independent Alliance proposed transferring only electors from the west of the ward. We propose basing our proposed Buckingham ward on the Conservative Independent Alliance's proposal as we consider that crossing the Upper Shoreham Road in one place is preferable to crossing it in two different areas which, in our opinion, would result in a weaker boundary and a less cohesive ward. However, we are putting forward a minor modification to the Conservative Independent Alliance's proposed ward. We propose running the boundary between Buckingham and St Nicolas wards behind the properties on the northern side of The Avenue so that all the electors in The Avenue are included in St Nicolas ward. We consider that this modification will provide a better reflection of community identity by including all those electors of The Avenue together in the same ward. We also propose modifying the boundary between Buckingham and Hillside wards tying it to firm ground detail. This modification does not affect any electors.

52 Having decided to base our proposals for Buckingham ward on those put forward by the Conservative Independent Alliance, due to the knock-on effect on neighbouring wards, our draft recommendations for St Mary's, St Nicolas and Southlands are also broadly based on the Conservative Independent Alliance's proposals. We propose including the electors of The Avenue in the Conservative Independent Alliance's proposed St Nicolas ward and we also propose a modification to its southern boundary. We propose including the area west of Victoria Road, currently in St Mary's ward, in our proposed St Nicolas ward, including the new development known as the Ropetackle site. Having visited the area we have noted that although this would result in breaching the Shoreham to Worthing railway line there is good access across the railway using Old Shoreham Road and Victoria Road. This modification would provide much improved electoral equality in both our proposed St Mary's and St Nicolas wards. We propose two modifications to the eastern boundary of the Conservative Independent Alliance's proposed St Mary's ward. We propose including Kingsland Close in Southlands ward as the electors in Kingsland Close are separated by the Dolphin Industrial Estate from the electors in St Mary's ward in which the Conservative Independent Alliance proposed they should be included. The electors of Kingsland Close would have good access into the proposed Southlands ward, which we consider would provide effective and

convenient local government. Following this modification we propose transferring Southlands Hospital, which includes a new housing development, into St Mary's ward to improve the level of electoral equality in both St Mary's and Southlands wards. We propose including those electors, currently in Southlands ward, of Chiltern Close, St Julians Close and numbers 159–193 Middle Road in Southwick Green ward, as detailed earlier in the chapter.

53 We have noted that both Adur District Council and the Conservative Independent Alliance proposed that Marine ward should retain its existing boundaries. We are content that as the boundaries of this ward are the sea, Adur River and the Lancing parish boundary there should be no change to the ward's boundaries. Under a council size of 29 this ward provides good levels of electoral equality.

54 Under our draft recommendations Buckingham ward would have a councillor:elector ratio equal to the district average (1 per cent above by 2006). Marine, St Mary's and St Nicolas wards would have councillor:elector ratios 10 per cent, 9 per cent and 5 per cent below the district average respectively (3 per cent above, 2 per cent below and 1 per cent above by 2006). Southlands ward would have a councillor:elector ratio 3 per cent above the district average both initially and in 2006. Our draft proposals are illustrated on Map 2 and the large map at the back of the report.

Churchill, Manor, Mash Barn and Widewater wards

55 The wards of Churchill, Mash Barn and Widewater are situated within Lancing parish, while Manor ward comprises part of Lancing parish and the whole of Coombes parish. These four wards are situated in the centre of the district and each return three councillors. Under the existing arrangements Churchill and Widewater wards have councillor:elector ratios 5 per cent and 26 per cent above the district average respectively (3 per cent and 26 per cent by 2006). Manor and Mash Barn wards have councillor:elector ratios 7 per cent and 20 per cent below the district average respectively (9 per cent and 22 per cent by 2006).

56 Adur District Council proposed that these four wards should each return two councillors and should all be subject to boundary modifications to provide improved levels of electoral equality. It proposed a new boundary between Churchill and Widewater wards running down South Street before following Ingleside Crescent, Ingleside Road and Penhill Road to the coast. The District Council stated that those electors to the west of this boundary, currently in Widewater ward, should form part of a new Churchill ward. To accommodate these electors in a new Churchill ward the District Council proposed modifications to Churchill ward's northern boundary. It proposed transferring into Manor ward those electors north of Field Close and Vincent Close and west of Annweir Avenue, and proposed transferring into Mash Barn ward the electors situated to the east of Annweir Avenue and north of Sompting Road, Rosecroft Close and St Bernards Court. It proposed a minor modification between Manor and Mash Barn wards to include in Mash Barn ward the electors on the western side of First Avenue. Finally, it proposed a minor boundary modification between Churchill and Peverel wards to provide a more identifiable boundary.

57 The Conservative Independent Alliance proposed five two-member wards covering this area. It proposed transferring into a revised Churchill ward those electors currently situated in Widewater ward, to the west of Kings Close and Kings Road together with the electors of the existing Churchill ward, to the south of the Shoreham to Worthing to railway line. The Conservative Independent Alliance proposed a new Monks ward comprising the remainder of the existing Churchill ward, and electors currently in Cokeham and Peverel wards, as outlined

later in the chapter. It also proposed a minor boundary modification between Manor and Mash Barn wards to include in the latter those electors on the western side of First Avenue. These proposals were supported in full by the East Worthing & Shoreham Conservative Association.

58 We have carefully considered both sets of proposals for these four wards. As stated earlier in the chapter, we are proposing a council size of 29 for Adur District Council. Under this council size Coombe and Lancing parishes are entitled to nine district councillors. We have consequently been unable to provide a uniform pattern of two-member wards in this area. We have also decided not to adopt the Conservative Independent Alliance's proposal to include electors of Sompting parish in a new Monks ward as we consider that the existing boundary between the two parishes should be retained at district ward level, as it is more easily identifiable than the boundary put forward by the Conservative Independent Alliance. We have also noted that the parish councils of Lancing and Sompting did not support the proposal by the Conservative Independent Alliance to include parts of Sompting parish in a ward with electors of Lancing parish. In Lancing we are therefore proposing a single-member ward and four two-member wards as we consider that a three-member ward might be too large geographically. However, we would welcome comments during Stage Three.

59 We propose creating a new single-member Widewater ward covering the area between the parish boundary and the Happy Days Caravan Park. We are utilising the drainage system, which crosses the open land between Boundary Road and Old Salts Farm Road, as a boundary. The Commission considers that this area is the most suitable for a new single-member ward in Lancing as it is slightly separated from the rest of Lancing. We also note that our proposal provides a clear boundary and good levels of electoral equality. Having decided to propose a new single-member Widewater ward we have had to develop our own proposals for Churchill ward and the remainder of the existing Widewater ward.

60 We are proposing a revised two-member Churchill ward and a new two-member South Lancing ward. Consequently we have had to divide, between these two wards, the area currently in Churchill ward south of the Shoreham to Worthing railway line. We are proposing that South Lancing ward should comprise those electors south of Marlborough Road, including all those situated on Brighton Road currently in Churchill ward, together with the majority of the remainder of Widewater ward. We propose a minor modification to Churchill ward's eastern boundary, transferring those electors on the eastern side of South Street currently in Widewater ward, into Churchill ward. Our proposed Churchill ward would comprise the majority of the remainder of the existing Churchill ward with only a minor modification to its northern boundary. We note that our proposed South Lancing ward has limited access, only along Brighton Road, between its two constituent parts. However, we considered that this would provide a better solution than including the area south of Marlborough Road in a ward with the electors to the north of the Shoreham to Worthing railway line from which they are separated by the Churchill Industrial Estate. We would welcome comments from local people on this proposal and on our proposed ward name of South Lancing.

61 In the remainder of Lancing we propose adopting the Conservative Independent Alliance's proposed Mash Barn ward as we consider that it provides the best balance between electoral equality and the statutory criteria. We are proposing a minor boundary modification between Churchill and Manor wards to provide improved electoral equality. We propose transferring those electors of Lancing Close and the southern side of Crabtree Lane into a revised Manor ward.

62 We are unable to adopt the minor modification between Churchill and Peverel wards as proposed by the District Council, as this would require the creation of a parish ward of Lancing parish covering the four properties of Hurtsfield. This would clearly not provide effective and convenient local government. Under the Local Government and Ratings Act 1997 Adur District Council has the power to review external parish boundaries to address such anomalies, and we would recommend that such a review should be undertaken in this case once our periodic electoral review has been completed.

63 Under our draft recommendations Manor and Widewater wards would both have a councillor:elector ratio equal to the district average (2 per cent below and 4 per cent above respectively by 2006). Churchill and Mash Barn wards would have councillor:elector ratios 1 per cent and 2 per cent below the district average respectively (3 per cent and 4 per cent by 2006). South Lancing ward would have a councillor:elector ratio 4 per cent above the district average (1 per cent by 2006). Our draft proposals are illustrated on Map 2 and the large map at the back of the report.

Cokeham and Peverel wards

64 The wards of Cokeham and Peverel are situated to the west of the district covering the entirety of Sompting parish. Under the existing arrangements both wards return three councillors each. Cokeham and Peverel wards have councillor:elector ratios 2 per cent and 12 per cent below the district average respectively (5 per cent and 13 per cent by 2006).

65 Adur District Council stated that these two wards needed “to be evened out...to get both wards within the tolerances of the PER. The proposed boundary revision was formulated by the parish”. It proposed moving the boundary between Cokeham and Peverel wards to run to the rear of the properties on the northern side of Grafton Drive. It also proposed a minor boundary modification between Churchill and Peverel wards to provide a more identifiable boundary.

66 The Conservative Independent Alliance supported the District Council’s proposal to move the boundary between Cokeham and Peverel wards to run to the rear of the properties on the northern side of Grafton Drive as far as Greentree Crescent. However, it proposed transferring into a new Monks ward those electors to the east of Cokeham Lane and north of Tower Road, currently in Peverel ward and those electors east and south of Greentree Crescent, currently in Cokeham ward, together with electors from the existing Churchill ward, as outlined earlier. These proposals were supported in full by the East Worthing & Shoreham Conservative Association.

67 We have carefully considered the proposals put forward for these two wards during Stage One. We were pleased to note that the District Council’s proposal had the support of both Lancing and Sompting Parish Councils and did not require any parish warding, as proposed by the Conservative Independent Alliance. We have therefore decided to adopt the District Council’s proposed Cokeham and Peverel wards. However, as stated earlier, we are unable to adopt the minor modification between Churchill and Peverel wards that the District Council proposed, however, we would recommend that Adur District Council undertakes a review of parish boundaries to address this anomaly, once our review has finished.

68 Under our draft recommendations Cokeham and Peverel wards would both have councillor:elector ratios 4 per cent above the district average (equal to and 2 per cent above by 2006 respectively). Our draft proposals are illustrated on Map 2 and the large map at the back of the report.

Electoral Cycle

69 We received two responses regarding the District Council's electoral cycle. The District Council itself stated that it wished to see biennial elections introduced. This proposal was supported by the East Worthing & Shoreham Conservative Association stating that "this would cut down administrative costs and would also help with the management of the Council by getting away from annual elections".

70 However, until such time as the Secretary of State makes any Order under the Local Government Act 2000, we continue to operate on the basis of existing legislation, which provides for elections by thirds or whole-council elections in two-tier areas. Statutorily, we have no power to recommend a change to biennial elections. We therefore propose no change to the Council's present system of elections by thirds, at this time.

Conclusions

71 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 39 to 29;
- there should be 15 wards;
- the boundaries of 13 of the existing wards should be modified, resulting in a net increase of one, and one ward should retain its existing boundaries;
- elections should continue to be held by thirds.

72 Our draft recommendations would involve modifying the boundaries of all but one of the existing wards in Adur district, as summarised below:

- in Sompting we propose adopting the District Council's proposal for Cokeham and Peverel wards;
- in Lancing we propose adopting the Conservative Independent Alliance's proposed Mash Barn ward while putting forward our own proposals for Churchill, Manor, South Lancing and Widewater wards;
- in the unparished part of the district we propose basing our draft recommendations on proposals from both the District Council and the Conservative Independent Alliance, however we have proposed a number of boundary modifications;
- there should be no change to the boundaries of Marine ward.

73 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	39	29	39	29
Number of wards	14	15	14	15
Average number of electors per councillor	1,200	1,614	1,237	1,664
Number of wards with a variance more than 10 per cent from the average	5	0	5	0
Number of wards with a variance more than 20 per cent from the average	3	0	3	0

74 As shown in Table 5, our draft recommendations for Adur District Council would result in a reduction in the number of wards with an electoral variance of more than 10 per cent from five to none. By 2006 no wards are forecast to have an electoral variance of more than 4 per cent.

Draft Recommendation

Adur District Council should comprise 29 councillors serving 15 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 elections by thirds.

Parish Council Electoral Arrangements

75 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 the parishes of Lancing and Sompting to reflect the proposed district wards.

76 The parish of Lancing is currently served by 16 councillors representing four wards: Churchill, Manor, Mash Barn and Widewater wards, each returning four parish councillors. As detailed earlier in the report we are proposing five district wards covering Lancing parish. Consequently, we are required to create at least five parish wards and in order to try and provide a good level of electoral equality at parish ward level we are proposing that Lancing Parish Council should return 18 councillors, an increase of two. This increase in council size will enable us to retain four four-member Churchill, Manor, Mash Barn and South Lancing parish wards and a new two-member Widewater parish ward with each parish ward reflecting

the district ward of the same name. However, if Lancing Parish Council and local people do not believe that a parish council of 18 councillors is appropriate for the area we would welcome alternative proposals at Stage Three.

Draft Recommendation

Lancing Parish Council should comprise 18 councillors, two more than at present, representing five wards: Churchill, Manor, Mash Barn and South Lancing wards (returning four councillors each) and Widewater ward (returning two councillors each). The parish ward boundaries should reflect the proposed district ward boundaries in the area, as illustrated and named on the large map inserted at the back of the report.

77 The parish of Sompting is currently served by 12 councillors representing four wards: Cokeham North, Cokeham South, Peverel North and Peverel South wards, each returning three parish councillors. As detailed earlier in the report we are adopting the District Council's proposed boundary modification at district ward level. Consequently, we propose modifying the parish ward boundaries to reflect our new district ward boundaries. We propose no further change to the electoral arrangements of Sompting parish.

Draft Recommendation

Sompting Parish Council should comprise 12 councillors, as at present, representing four wards: Cokeham North, Cokeham South, Peverel North and Peverel South wards (each returning three councillors). The parish ward boundaries should reflect the proposed district ward boundaries in the area, as illustrated and named on the large map inserted at the back of the report.

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

Draft Recommendation

Parish 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 Adur

5 WHAT HAPPENS NEXT?

79 There will now be a consultation period, during which everyone is invited to comment on the draft recommendations on future electoral arrangements for Adur 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.

80 Express your views by writing directly to us:

Review Manager
Adur 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
www.lgce.gov.uk

81 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

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 A1: 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.