East Cambridgeshire District Council

Response to LGBCE electoral review of Cambridgeshire new draft recommendations consultation.

Background

In its draft recommendations on the new electoral arrangements for Cambridgeshire County Council published in May 2015, the Local Boundary Commission for England (LGBCE) set out proposals for a council size of 61 and a division pattern to accommodate this number of councillors.

For East Cambridgeshire these proposals returned 8 county councillors and recommended 6 new electoral divisions.

East Cambridgeshire District Council submitted a response to the draft recommendations consultation in July 2015 proposing two alternative division patterns, with scenario one being the preferred option:

- Scenario 1: 63 Members 9 single member divisions
- Scenario 2: 61 members 8 single member divisions

However, in the report on their final recommendations, the LGBCE states that it did not receive sufficient evidence to change the allocation of councillors for East Cambridgeshire and so their final recommendations should allocate eight councillors for the district. Furthermore, they considered that the alternative pattern of eight single member divisions did not reflect the statutory criteria, particularly in Ely, Downham and Witchford as it created a division that did not reflect communities. They therefore confirmed their draft recommendations as final, subject to a minor amendment in Littleport to correct a defaced boundary division.

At the draft recommendation consultation stage of the review, the LGBCE received 38 submissions relating to the draft proposals for East Cambridgeshire. These include responses from the local residents, district and county councillors, parish councils, local political groups and Steve Barclay MP. The submissions objected to the draft recommendations and indicated strong support for single member divisions. There were also objections to dividing the current Sutton division.

On 24th March 2016 the LGBCE announced that a new phase of consultation would be held on the electoral arrangements for Cambridgeshire County Council, in response to comments they received about the review process and the final recommendations they produced.

The purpose of the consultation is to give local people and groups the opportunity to comment on the final recommendations for the county that were published in February 2016. The LGBCE will consider the submissions it receives and publish new final recommendations for the new County electoral arrangements in September 2016.

ECDC response to further round of consultation

East Cambridgeshire District Council (ECDC) wishes to make the following points relating to the new draft recommendations and the council size and division pattern proposed.

1

Council size

The Council is concerned that its submission for 9 single-members was not given due consideration and that this submission will likewise not be properly taken into account.

The LGBCE initially agreed to the County Council's size proposal of 63 and invited proposals for division arrangements based on a council size of 63 councillors. However, during the development of the draft recommendations, the LGBCE changed the proposed council size to 61 as it considered it would better reflect the Commission's statutory criteria and provide a better allocation of county councillors between districts.

The LGBCE has stated that this meant that comments put forward based on a council size of 63 could not be taken account of as part of the draft recommendations because they would not meet the statutory criteria under a council size of 61. It also meant that interested parties only had one opportunity to comment on proposals based on a council size of 61. In information obtained from the LGBCE it is stated that:

"We launched full public consultation on division boundaries (on the basis of a council size of 63) on 28 October 2014 – 19 January 2015.

We then examined the submissions received and developed out draft recommendations. During this we noted that changing the council size by 2 (to 61) provided a better allocation of councillors overall and a better overall scheme. As we changed the council size, there were proposals put forward to us during the previous consultation period (based on the original council size of 63) that we could not take account of.

We therefore worked on the basis of 61 councillors and published draft recommendations on 12 May 2015. It was at this point that local people would have been aware of and been able to comment on the different council size and provide proposals based on this number. The consultation ran until 6 July 2015."

This statement, and particularly the words "could not take account of", appears to indicate that the LGBCE was not open minded to proposals relating to a different council size and did not even take the proposal into account or give it any consideration. Given that the LGBCE Electoral Reviews Technical Guidance 2014, allows, at paragraph 4.29¹ for changes to be made to council size throughout the review process (and in the case of the Hertfordshire review, at the final decision stage, where one seat was added to Welwyn Hatfield District's allocation without any opportunity for objection) then it follows that the LGBCE must fully consider proposals for alternative council size at all stages of the review and must not close its mind to alternatives.

The LGBCE also acknowledges that in the case of East Cambridgeshire, the scheme put forward by ECDC at the draft recommendations consultation stage would have required substantial changes to

¹ Para 4.29 "Even if we are content with the rationale provided in support of a proposal for council size, we may choose, at a later stage of the review process, to consider whether it is necessary to change this number slightly in order to ensure better levels of electoral representation across the district or county. Having regard to the nature and extent of communities or to appropriate ward/division boundaries, it is often possible to improve the levels of electoral representation across an authority by making minor modifications of one or two to the council size".

the Commission's proposals. Information received from the LGBCE states that as a matter of practice, the Commission is:

"reluctant to make fundamental alterations to its draft recommendations as it would not give other interested parties the opportunity to comment on a substantive scheme".

Therefore, it appears that the LGBCE was not prepared to change its draft recommendations, regardless of the consultation responses it received, in order to avoid further consultation.

This raises further concerns regarding the purpose of this new round of consultation and the confusing messages given put by LGBCE regarding its remit and scope.

The letter received by the ECDC Chief Executive from the LGBCE dated 24th March 2016 states that:

"The Commission has an open mind about potential changes to its recommendations as a result of the consultation and will welcome views in support of the proposals and suggestions for alternative boundaries that meet the criteria set out in law. Once the consultation has closed, the Commission will carefully examine all the evidence presented and publish final recommendations in September 2016."

Yet the consultation documents relating to the new consultation specify that the LGBCE is

"seeking submissions for alternative patterns of eight single-member divisions for East Cambridgeshire."

This appears to indicate that the LGBCE is, yet again, not open minded to proposals relating to a different council size and that these may not be given due consideration, as the same situation is likely to arise if the LGBCE reverts back to a council size of 63. Interested parties will not have the opportunity to comment on this change if published as the final recommendations because it will still not allow for 2 full rounds of consultation. It appears likely that the LGBCE will again avoid making fundamental alterations to its draft recommendations because other interested parties will not have the opportunity to comment on a substantively altered scheme.

In information obtained from the LGBCE, the Council notes that the LGBCE received legal advice that:

"...the publication of the final recommendations is the end of the review and so the further draft recommendations should be a new review which follows the statutory procedure under s58 of the 2009 Act. In terms of framing this, the Commission will have to consider how to do this, but it would seem that the further draft recommendations have to acknowledge the final recommendations already published and explain what is being dealt with in the further draft and why, and you may also wish to make clear that other issues in the final recommendations are not being re-opened."

Section 58, para 1, part b of the Local Democracy, Economic Development and Construction Act 2009 requires that the review procedure includes taking steps to ensure that consultees are informed of "any particular matters to which the review is to relate." It would appear that the LGBCE has decided to ignore the legal advice to make clear that other issues in the final recommendations are not being re-opened; this is evident from its statement relating to this period of consultation, which

effectively states that all aspects are open for consideration – the LGBCE "has an open mind about potential changes to its recommendations as a result of the consultation and will welcome views in support of the proposals and suggestions for alternative boundaries that meet the criteria set out in law".

Section 58, para 2, part c of the Act requires that the review procedure takes "into consideration any representations made to the Local Government Boundary Commission for England within that period." The LGBCE is therefore required, by statute, to consider changes to council size during this latest round of consultation.

The LGBCE should consider starting a completely new review as this is the only way to allow for sufficient rounds of consultation on the recommendations put forward by the LGBCE.

The Council also urges that as part of the consultation process, the LGBCE allows for a workshop with relevant officers and Members to jointly produce draft recommendations in an open and transparent manner.

In terms of its submission to this round of consultation, ECDC concurs with CCC that a council size of 63 will best help the county council deliver effective and convenient local government.

In its submission to the LGBCE in July 2014, Cambridgeshire County Council (CCC) set out the case for a council size of 63 councillors. The County Council tested scenarios for 57, 59, 61 and 63 councillors. Of the various scenarios, 63 councillors was considered to be the most workable, based on the options developed on possible division boundaries, based on single Member Divisions (see http://www2.cambridgeshire.gov.uk/CommitteeMinutes/Committees/Agendaltem.aspx?agendaltemID = 10062 for details of this scenario testing).

At the district level, being represented by 9 rather than 8 county councillors will give the residents of East Cambridgeshire better access to their elected representatives and have less impact on the workloads of county councillors for the district, enabling more effective engagement with local residents, due to the lower average electorate they represent.

The electoral variances for each of the nine proposed divisions are within the permitted variance and although important, elector equality is only one of three statutory criteria and too much emphasis has been put on this one measure at the expense of the other two.

A council size of 63 will also enable the county council to deliver effective and convenient local government in other districts and this consultation response should be considering in conjunction with submissions from other councils in Cambridgeshire.

Single-member divisions

ECDC continues to support the County Council's view that it is appropriate to abolish its existing two Member divisions and ECDC's proposed 9 single-member arrangement allows for this. ECDC agrees that single member divisions are more transparent and accountable, and give greater clarity to both the electorate and local organisations (e.g. Parish, Town and City Councils) as to where the responsibility lies. Two member divisions can cause confusion, especially where Members have differing views on local issues.

Division pattern

Whilst ECDC recognises that a perfect division arrangement is not possible, the LGBCE proposals represent a worse reflection of local communities than the ECDC proposal.

Table 1 below compares and contrasts the two arrangements. The main advantages and disadvantages of each proposal are:

Council's 9 member proposal

Advantages

- Littleport parish remains intact.
- The three market towns do not share divisions.
- More separation between market towns and the smaller parishes.
- The district's north-south divide is preserved.
- The additional councillor means that each councillor represents a smaller electorate.
- All divisions are represented by a single member.

Disadvantages

- Sutton is split between two divisions.
- Some rural parts of the market town parishes are divided from the main areas.

LGBCE final recommendations

Advantages

- Ely represented by 2 single member divisions.
- Sutton parish remains intact.

Disadvantages

- Littleport is split between two divisions.
- Large divisions in terms of area and number of parishes they contain.
- Large areas of Littleport and Soham in the same division.
- Less separation between market towns and the smaller parishes.
- Some rural parts of the market town parishes are divided from the main areas.
- Burwell, Reach, Swaffham Bulbeck and Swaffham Prior aligned with villages in the north of the district, cutting across the district's north-south divide.
- Fewer councillors' means that each councillor represents a smaller electorate.
- The arrangement comprises 2 two-member divisions.

Table 1: ECDC 9 Member proposal vs. LGBCE recommendations

Division	9 single member divisions	LGBCE Final recommendations
EC_1	All of Littleport is in the same division. This	Littleport is split. The eastern part of the
Littleport	reflects its community identity and provides	parish forms a division with the northern

	for effective and convenient government as	part of Soham.
	only one councillor represents the area.	part of contain.
	Keeping Littleport together also makes this arrangement coterminous with the draft ECDC recommendations where it is proposed to de-ward Littleport.	These two market towns share no community links or identity. The elected members representing this division will have to have knowledge of both the market towns and may have to represent conflicting priorities.
		The western part of Littleport parish forms a division with 12 other parishes. It also includes Chettisham, part of Ely Parish.
		This division does not reflect community identities or provide for effective and convenient government as two councillors will have to cover this area. If these councillors are unable to share the workload, attending to 13 parish councils is an enormous task for 1 person and this may reduce the effectiveness to represent the whole area equally.
		Dividing Littleport makes this arrangement non-coterminous with the draft ECDC Recommendations where it is proposed to de-ward Littleport.
EC_2 Ely West	The City of Ely is divided between 2 divisions which do not include parts of other parishes. This reflects its community identify and provides for effective and convenient government as only 2 councillors will cover the whole city.	Ely is split into 2 single-member divisions which do not include parts of other parishes. This reflects its community identify and provides for effective and convenient government.
EC_3 Ely East	The City of Ely is divided between 2 divisions which do not include parts of other parishes. This reflects its community identify and provides for effective and convenient government as only 2	Ely is split into 2 single-member divisions which do not include parts of other parishes. This reflects its community identify and
	councillors will cover the whole city.	provides for effective and convenient government.
EC_4 Sutton North and Downham Villages	The west of the district is divided into 2 areas comprising the villages only and not areas of the market towns. This reflects the community identities of the smaller parishes and prevents them from being dominated	Though the parish of Sutton remains intact it is part of a division with 12 other parishes, including the western part of Littleport.
J	by the larger market towns. The smaller parishes are also more likely to have similar issues to each other than they are with the	This arrangement does not reflect community identities, nor does it allow for effective and convenient government as

	market towns. Many of the parishes already form the existing Sutton division. The parish of Sutton is divided but this facilitates good electoral equality throughout the district and both parts are in divisions with which they share community links.	councillors will be representing 13 Parish Councils and to attend meetings and represent all those communities is an enormous remit for two Councillors.
EC_5 Sutton South and South Ely Villages	The west of the district is divided into 2 areas comprising the villages only and not areas of the market towns. This reflects the community identities of the smaller parishes and prevents them from being dominated by the larger market towns. The smaller parishes are also more likely to have similar issues to each other than they are with the market towns. The parish of Sutton is divided but this facilitates good electoral equality throughout the district and both parts are in divisions with which they share community links.	Though the parish of Sutton remains intact it is part of a division with 12 other parishes, including the western part of Littleport. This arrangement does not reflect community identities, nor does it allow for effective and convenient government as councillors will be representing 13 Parish Councils and to attend meetings and represent all those communities is an enormous remit for two Councillors.
EC_6 Soham North	Soham is divided between two divisions – Wicken is included at the request of Wicken Parish Council.	The north of Soham is aligned with a large part of Littleport. As stated previously they share no links so this division does not reflect community identity.
	The division is represented by a single member allowing for effective and convenient government as single-member divisions are more transparent and accountable, and give greater clarity to both the electorate and local organisations.	One councillor will be responsible for representing large areas of two market towns with different needs and interests, which may on some issues be in conflict.
EC_7 Soham South and South Soham Villages	The division includes the villages to the south of Soham as per the existing arrangement. The division is represented by a single member allowing for effective and	This arrangement allows Wicken to remain aligned to Soham but including Burwell, Reach and the Swaffhams, in this division does not reflect the community identity of those parishes or the district as a whole.
	convenient government as single-member divisions are more transparent and accountable, and give greater clarity to both the electorate and local organisations.	Also, it does not allow for effective and convenient government as two councillors will be representing 12 parishes. Burwell, Reach and the Swaffhams look to Newmarket for services so the members representing them would also be expected to be informed of cross border

		developments in Suffolk.
EC_8 Burwell	By keeping Burwell separate for the parishes of Chippenham, Fordham, Isleham, Kennett and Wicken, the district's north-south divide is preserved, reflecting the different identities of these areas.	This arrangement allows Wicken to remain aligned to Soham but including Burwell, Reach and the Swaffhams, in this division does not reflect the community identity of those parishes or the district as a whole.
	The division is represented by a single member allowing for effective and convenient government as single-member divisions are more transparent and accountable, and give greater clarity to both the electorate and local organisations.	Also, it does not allow for effective and convenient government as two councillors will be representing 12 parishes. Burwell, Reach and the Swaffhams look to Newmarket for services so the members representing them would also be expected to be informed of cross border developments in Suffolk.
EC_9 Woodditton	The existing division boundary is preserved with the exception of Lode. A Lode is to the north of the B1102, placing it in the Burwell division provides for efficient local government is geographical terms, as it is more connected to the rest of the division. The division is represented by a single member, allowing for effective and convenient government as single-member divisions are more transparent and accountable, and give greater clarity to both the electorate and local organisations.	The existing division boundary is preserved. The division is represented by a single member, allowing for effective and convenient government as singlemember divisions are more transparent and accountable, and give greater clarity to both the electorate and local organisations.

The Council believes that the proposals it submitted to the draft recommendations consultation meet the statutory criteria more effectively that the arrangement proposed by the LGBCE.

The LGBCE appears to have failed to follow its own guidelines and statutory requirements as the arrangements do not reflect local community interests and identities, nor do they allow for effective and convenient local government. The LGBCE has also disregarded the submissions to the draft recommendations consultation without providing sufficient written justification as to why it did so.

The council is disappointed that despite the overwhelming level of objections received, the LGBCE made no material amendments to the draft proposals to take account of these consultation responses, even though the majority of the objections related to the Fordham Villages & Soham South, Littleport East & Soham North and Littleport West divisions.

Not only has the LGBCE ignored the consultation responses, they have also ignored the alternatives suggested and ignored the high level of support for single-member divisions. East Cambridgeshire is

the only district in the county to have 2 two-member wards, whilst Huntingdonshire does not have any.

The alternative proposals for 9 councillors submitted by this Council addressed both the issue of Littleport West and single member divisions. Although not united in the fine detail, all three political parties (Conservative, Labour and Liberal Democrats) agreed that the option of 9 Councillors for East Cambridgeshire provides a better solution and would better reflect natural communities that exist.

The new electoral arrangement for East Cambridgeshire does not reflect the identity and interests of local communities.

The new arrangement does not reflect the identity and interests of local communities. The new Littleport West Division covers 13 Parish Councils, all with different identities. The proposed Littleport East and Soham North division incorporates such a large and varied area of the district, including areas of all the market towns in the district, that all sense of individual community identity is lost.

There are no examples of coordinated events or groups between the market towns, yet each has numerous examples of these within its own community. The market towns of Ely, Littleport and Soham have very distinct identities and communities and it is imperative that they are kept within separate electoral divisions and not merged as in the LGBCE proposal.

In addition, transport links across the LGBCE's proposed divisions are poor, there are no overarching community groups that represent the area, the divisions do not reflect where people go to access local services and there are no interests which bind the communities together.

The smaller divisions proposed by ECDC meets the statutory requirement to reflect the identity and interests of local communities to a far greater degree that the large ones proposed by the LGBCE.

East Cambridgeshire can be broadly defined into two subareas. The northern part of the district is predominantly intensively farmed fenland, with many settlements located on higher ground on the old 'islands' in the fen. The south of the district is dominated by the horseracing industry with large areas of farmland converted to stud use.

The Council's proposal reflects this by arranging the northern and southern areas into separate divisions. This arrangement is based on secondary school catchment boundaries as these facilities act as a hub for the local communities, offering additional benefits such as meeting rooms and other facilities. This arrangement keeps the three market towns separate for the reasons given above, aligning them only with adjacent communities. Rural villages have very different characteristics to the market towns and as such careful consideration of the local identities and links was given when aligning them into divisions.

The new arrangement does not meet the statutory requirement of providing for effective and convenient local government.

The new arrangement does not allow for effective and convenient local government. The new Littleport West division covers 13 Parish Councils and to attend meetings and represent all those communities is an enormous remit for two Councillors. Littleport East and Soham North division contains areas of all the market towns in the district, each of which have different issues and often competing priorities. County members for these wards will need to attend the parish meetings and be

aware of the business that occurs in the divisions that contain the other parts of the market towns, in order to be able to provide informed support to electors they represent.

Keeping the market town communities together as the Councils proposal does, will allow for more effective and convenient local government as it will reduce the range of differing views on local issues and result in a greater focus of work for County Councillors. The smaller parishes are more likely to have similar issues to each other (e.g. lack of public transport and employment opportunities) than they are with the market towns.

The Council's view is that single-member divisions are more transparent and accountable, and give greater clarity to both the electorate and local organisations (e.g. Parish, Town and City Councils) as to where the responsibility lies. Two-member divisions can cause confusion, especially where Members have differing views on local issues.

Coterminosity

The final recommendations split the parish of Littleport which the East Cambridgeshire Electoral Review draft recommendations propose to de-ward. In addition, both Littleport East & Soham North and Littleport West divisions will also be split in terms of parliamentary constituency. This means that not only is the new arrangement not coterminous at district level, it is also not coterminous at parliamentary level.

ECDC proposal: 63 members – 9 single member wards

Table 2 - 9 single Member Divisions

Division Name	No. of Clirs	Electorate 2020	Variance 2020 (%)	Description	Detail
EC_1 Littleport	1	8,350	0.9	Littleport East, Littleport West, Queen Adelaide, Prickwillow	Our proposal retains the identity of Littleport by keeping it together in one Division.
EC_2 Ely West	1	9,063	9.5	Ely West, Ely South (less 2-62 Cambridge Road, Samuels Way, Cambridge Court, Marriott Drive, Houghton Gardens, Tower Road) and polling district HF2 to left of Lynn Road only.	Our proposal divides Ely into West and East, utilising the strong and well recognised boundary lines of the two main roads into Ely, with some minor acceptable deviations as detailed.
EC_3 Ely East	1	7,857	- 5	Rest of Ely	Our proposal divides Ely into West and East, utilising the strong and well recognised

					boundary lines of the two main roads into Ely, with some minor acceptable deviations as detailed.
EC_4 Sutton North & Downham Villages	1	7,464	- 9.8	Chettisham, Downham South, Pymoor, Witchford, Coveney, Witcham, Mepal, Wentworth and part of Sutton, north of Station Road, High Street and along B1381 to The America.	Sutton Parish Council is opposed to the proposal to include Ely North within its boundaries and stated that it identifies more with other rural villages. Our proposal divides Sutton into North and South, utilising the strong highway boundary of Station Road, High Street and the B1381 to The America, roads that lead naturally into each other. Sutton has a strong relationship and community links with the villages to both the north and south. Dividing Sutton into two facilitates good electoral equality throughout the District, but also has the benefit of retaining working relationships of Sutton with the villages to both the north and south of it. Sutton has worked collaboratively on a number of projects with the villages proposed for inclusion, such as youth provision and campaigning for improved infrastructure such as safety improvements and a cycleway on the A142. Little Downham is connected to Chettisham via ancient drove routes.

EC_5 Sutton South & South Ely Villages	1	7,456	-9.9	Little Thetford, Stretham, Wilburton, Haddenham, Aldreth, and part of Sutton, south of Station Road, High Street and along B1381 to The America.	Our proposal divides Sutton into North and South, utilising the strong highway boundary of Station Road, High Street and the B1381 to The America, roads that lead naturally into each other. Sutton has a strong relationship and community links with the villages to both the north and south. Dividing Sutton into two facilitates good electoral equality throughout the District, but also has the benefit of retaining working relationships of Sutton with the villages to both the north and south of it. Sutton has worked collaboratively on a number of projects with the villages proposed for inclusion, such as youth provision and campaigning for improved infrastructure such as safety improvements and a cycleway on the A142.
EC_6 Soham North	1	8,400	1.5	Wicken, Stuntney, Soham North and rest of Soham Central	Wicken Parish Council strongly stated their desire to retain long established links with Soham, including use of educational, health and retail facilities. Our proposal divides Soham into north and south.
EC_7 Soham South & South Soham Villages	1	7,580	-8.4	Soham South, Isleham, Fordham, Kennett, Chippenham, Snailwell and part of Soham Central	Our proposal divides Soham into north and south. The villages in this Division look to Soham.

				(Brook Dam Lane, College Close, Ennion Close, Frank Bridges Close, Gidney Lane, High Street (no.s 2-16 and 7-13), Ranthorne Mews, Red Lion Square, Regent Place, Sand Street, The Causeway)	
EC_8 Burwell	1	7,760	- 6.2	Burwell, Reach, Swaffhams, Lode	Our proposal retains Burwell's identity, particularly in relation to use of educational facilities, as being separate from Soham South and Fordham Villages, which look towards a different secondary school. There are many community links between the villages in this Division, with residents using the retail facilities in Burwell, (supermarkets, petrol station, Barclays Bank) as well as the GP surgery in Burwell. The vast majority of young people also attend the same Secondary School, Bottisham Village College. In common with other villages in the Division, Lode is a flat village and is on the edge of the fens; Lode is to the north of the B1102, therefore placing it in the Burwell Division provides for efficient local government in geographical terms.

EC_9 Woodditt on	1	7,720	- 6.7	Cheveley district ward, Dullingham Villages district ward, Bottisham district ward excluding Lode.	Our proposal uses the existing Woodditton Division boundaries excluding Lode, in order to achieve good electoral equality (see above for comments about Lode).
					commonte about 2000/i

