

Chief Executive

The Review Officer (Hampshire)
 Local Government Boundary Commission
 for England
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My Ref: DY/RR

29 July 2015

Dear Sir

ELECTORAL REVIEW OF HAMPSHIRE COUNTY COUNCIL – SUBMISSION BY NEW FOREST DISTRICT COUNCIL

This letter conveys the views of New Forest District Council in response to the Commission's initial consultation on the electoral review of Hampshire County Council. These views were agreed unanimously at a meeting of the full Council on 13 July 2015.

To summarise, the Council's firm view is that no changes should be made to the number of members representing New Forest District on Hampshire County Council, and that there should be no change in the electoral division boundaries.

The Council came to this view in the full knowledge that one of the aims of the review is to deliver electoral equality across the county and that, in New Forest District, some County Councillors represent fewer electors than the average throughout the county. However, the Council considers that the unique circumstances that apply in New Forest District, because of the nature of the New Forest itself and the existence of the New Forest National Park, warrant a higher level of representation by democratically elected County Councillors than other districts or boroughs. When arriving at its conclusions, the Council was also aware that the Commission has indicated that it is minded to recommend that the overall size of the County Council remains at 78.

Reasons for the Council's views are set out below:

1. Statutory Criteria

1.1 The three statutory criteria to which the Commission is required to have regard in considering a pattern of electoral divisions, as set out in the Local Democracy, Economic Development and Construction Act 2009, are (summarised):

- Electoral equality
- Community interests/identities with readily identifiable boundaries
- Effective and convenient local government

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1.2 No priority is placed on any one of these statutory criteria in either the 2009 Act or in the Commission's guidance. In the case of New Forest District, the Council considers that, because of the very special circumstances that apply, the second and third considerations should be given greater emphasis than the first, simple electoral equality.

2. Size of Divisions

2.1 The District Council fully supports the principle adopted by Hampshire County Council that it is practical and logical for County Councillors in urban areas to represent larger electorates, because in urban areas travel distances are shorter and communities and community facilities are generally located in a compact area. The District Council agrees that this position is appropriate in the light of the Commission's guidance "*How to propose a pattern of wards*" – page 11, which states "We will look at the geographic size of the ward or division and try to ensure that it is not so large that it would be difficult for a councillor to represent".

2.2 New Forest District contains two of the largest Divisions, in geographic terms, in the County. These Divisions are expected to have electorates in 2021 well below the Hampshire average. However, both divisions are far larger than the County average, as illustrated below:

Division	Size	Variance vs County Average	No. Parishes
Fordingbridge	91.98 sq. miles	386%	13 whole; 1 ward of one
Brockenhurst	85.22 sq. miles	350%	7 whole; 1 ward of one

2.3 Despite the significant distances involved, the members for both Divisions make every effort to attend meetings of the Parish Councils within their Divisions, but, particularly in Fordingbridge with the larger number of parishes, this proves very time-consuming. It is also often difficult for County Councillors to attend because meetings of different parish councils are held on the same dates. This means that County Councillors are not always able to maintain regular face-to-face communication with the Parish Councils they represent, which is not conducive to effective and convenient local government.

2.4 Expanding the size of these two Divisions to achieve greater electoral equality would mean placing unacceptable workloads on the County Councillors representing those Divisions.

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3. Development factors impacting on County Divisions

- 3.1 The centre, north and west (with the exception of the market towns of Ringwood and Fordingbridge) of New Forest District Council's area are mainly rural, with built-up areas along Southampton Water and the western Solent. There are constraints on housing development within the National Park. National and local policies within the National Park severely constrain new development and this places development pressures on the areas outside the Park. There are, and will continue to be, distinct urban and rural communities with little common identity or community of interest beyond a strong commitment to a New Forest identity.
- 3.2 Expanding an urban division into the sparsely populated rural areas, or vice versa, to achieve better electoral equality, would be inappropriate as there would be no specific community identity or community of interest.

4. Democratic Arrangements in the District

- 4.1 The New Forest National Park covers a large area of the District. The New Forest National Park Authority has statutory responsibility for some services, most notably planning. A number of other bodies such as the Forestry Commission, Natural England and the Court of Verderers must also be consulted over a wide range of issues. This complicates and delays decision-making, making democratic representation more complex and onerous. It places additional burdens on Councillors representing Divisions wholly or partly within the National Park, and makes the delivery of "effective and convenient local government" more difficult. The District Council considers that the additional workload on County Councillors should be recognised as warranting departures from the electoral equality criterion.

5. Electorate Forecasts

- 5.1 While the District Council fully appreciates the need for the LGBCE to set a point in time for projected electorates to form the basis for a review, and while respecting the integrity of Hampshire County Council's Small Areas Population Forecasts on which the projected 2021 electorates are based, it is considered that the forecasts must be regarded with some caution. The effects of Individual Electoral Registration, introduced in 2014, on current electorates in the New Forest and nationally, are still uncertain. In addition, in order to meet national planning guidance, the District Council has commenced a review of its Local Plan for the period 2016-2036. New development areas and housing allocations will be considered as part of this process. Given this context of uncertainty over future development and electorate levels, the Council considers that it would be premature to reduce the County's representation in the District.

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6. Dividing Rural Parishes

- 6.1 A consequence of achieving improved electoral equality following the last electoral review of Hampshire County Council was that some parish and towns were divided over different County Divisions. An example of this is Copythorne Parish, a rural parish with approximately 2,200 electors, which is divided between the Fordingbridge and the Lyndhurst Divisions. It is accepted that, because elector numbers are greater, larger towns and parishes have to be divided over different Divisions. However, the District Council holds the strong view that splitting rural parishes for the sole purpose of achieving electoral equality should be avoided. Such division of parishes is inevitably contrary to the principles of reflecting community interest and identity, and delivering effective and convenient local government.

There are some issues relating to the composition of the current County Divisions which the District Council considers are not ideal, such as:

- (a) the inclusion of a ward of Hythe & Dibden Parish Council within the South Waterside Division, which covers mainly the area of Fawley Parish Council;
- (b) the splitting of New Milton Town Council's area over three County Divisions;
- (c) the combination of two wards of Totton & Eling Town Council with the parish of Marchwood.

However, the difficulties which led to each are understood and the make-up of the Divisions has become accepted by local people and democratic representatives. The District Council is therefore not seeking any change to these as part of the current review. In general terms the District Council is content with the current arrangements for County representation and urges the Commission not to make any changes to the number of County Councillors representing the District or to County Division boundaries.

Yours faithfully



Dave Yates
Chief Executive

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