

# **Electoral Review**

**Wiltshire Council Response to the Draft  
Recommendations of the Local Government  
Boundary Commission for England  
April 2019**

## Executive Summary

1. This document sets out the response of Wiltshire Council (“The Council”) to the draft recommendations of the Local Government Boundary Commission for England (“The Commission”) on a pattern of 98 electoral divisions to apply from the next unitary elections in May 2021.
2. The response was prepared following consideration of the draft recommendations by the Electoral Review Committee (“The Committee”) and engagement with members of the Council.
3. The Commission’s draft recommendations to a large extent followed the proposals of the Council in its pattern of divisions submission made on 5 November 2018, either accepting the proposals directly or with minor amendments.
4. However, in a number of areas the draft recommendations propose significantly different electoral divisions. The Council considered all the proposals and was happy to accept many of them even where there were major changes from its own proposals, recognizing they were still acceptable under the statutory criteria. However, it considered that the local evidence demonstrates many others did not align with the criteria of the electoral review, namely that they did not provide convenient or effective local governance or represent community identity appropriately.
5. In particular, it was felt an inconsistent approach had been applied on the suitability of combining urban areas with rural areas without recognition of whether this is appropriate locally. While each proposed division must be considered in relation to local factors and therefore what is appropriate in one area may not be appropriate in another, the Commission’s proposals in several areas seems to demonstrate insufficient consideration of shared character and interests, and an overemphasis on in some cases quite limited road links as overwhelming any other factors and considerations of community, identity and governance.
6. The Council’s own proposals included significant changes in some community areas, demonstrating there was no undue commitment to clusters of divisions which did not align to the statutory criteria of the review. It would be incorrect to imply, therefore, that administrative concerns regarding area board arrangements were given prominence over the statutory criteria.
7. Moreover, as the Commission itself specifically noted that the Council should remain at 98 councillors *‘in the context of the Area Boards and their importance to the Council’s decision-making process’* it is inconsistent at the very least to then dismiss even the possibility of shared community identity among various parishes which have been combined in past divisions and area boards.
8. Effective and convenient local governance is one of the statutory criteria, and establishing a pattern of divisions which cannot be combined in a reasonable community undermines effective governance. To suggest that any assortment of divisions can be administratively combined ignores the they cannot be effectively administered, or effectively serve their communities with local grants and other powers, if there is no underlying connection between the divisions to be included. The area boards are a vital and legal element of the council’s governance, and must be reflective of the communities. As such, they are required to be fully considered under the statutory criteria.
9. Even starting with a blank canvass, given the logic of the Commission in recognising the importance of the area board system it would make no community sense to attempt to claim that while mere area board inclusion is not overwhelming evidence of shared

community identity, it is therefore entirely irrelevant. Particularly when the Council has as noted above made significant changes where the statutory criteria arguments made this reasonable. The Council feels its proposals are therefore in line with the statutory criteria.

10. However, in certain areas the proposals of the Commission themselves seemingly bypass the statutory criteria by focusing on only one element, electoral equality. The Commission's own guidance discusses parishes being used as building blocks, for the obvious reason that parishes are an example of local community identity, indeed the major example. For this reason, the guidance explicitly states that the importance of parishes should not be underestimated.
11. While the Council accepts and has indeed proposed some dividing of parishes where necessary for reasons of electoral equality or overwhelming community factors such as incoming significant new development (as opposed to already established development) which shares character with the larger urban areas, to be in accordance with the guidance this clearly should be done as a last resort or due to the emergence of those significant new factors, not as a convenient way of achieving electoral equality when other options exist.
12. A division proposal which relies solely on physical proximity and ignores the nature of or splits a parish is therefore flawed if alternate proposals highlight genuine shared interests and character between parishes, as well as sharing an identity close by but separate to a town, even if road links are not as ideal. This is the reason that there is a requirement in law that divisions be contiguous, but not a requirement in law that there be direct road links – because it is recognised an area's character is comprised of more than just road links, which appears in some cases to be the entire justification for the Commission's proposals.
13. The Council highlights the Commission's proposals in Melksham, Westbury and Laverstock & Ford as well as other individual changes in Malmesbury and Chippenham for examples of changes made focused overwhelmingly and unnecessarily on electoral equality or on a misapplication of the principle of community identity. In particular the idea that if an area 'looks to' a larger area, which every single village and parish does and is therefore not unique to any community, then it must be joined even where alternatives exist with demonstrable community support. The proposals in Laverstock are particularly egregious in their dismissal of community identity by arbitrarily dividing a community within the parish and joining them with a city parish to which there is overwhelming community identity in being separated from, whilst dismissing the Council's own proposal in part because it supposedly divided a community within the parish.
14. This document therefore sets out the Council's view on each of the 98 electoral divisions proposed by the Commission. It should be noted the Council has objected to the Commission's proposals in only around a fifth of divisions, with some of those objections being very minor. Where the proposals of the Council were accepted in the Draft Recommendations without variation, this submission should be read in conjunction with the reasoning and evidence set out in the submission of 5 November 2018.
15. The Council also reiterates in the strongest possible terms that all divisions should remain, as proposed, single member divisions. Multi-member divisions do not provide as clear and effective a representational arrangement, and 1 or 2 multimember divisions in an authority otherwise composed of single member divisions would in no conceivable way be considered to be clear, effective or efficient for local governance and no reasoning has been suggested to justify any such suggestion.
16. This submission was approved at an extraordinary meeting of the Council on 25 March

2019 with xx votes in favour, xx votes against and xx abstentions.

17. Supplementary evidence will also be attached for consideration, along with a list of minor comments on boundaries to correct errors, for example to ensure a division line aligns with parish boundaries. Any reference to there being no objection in principle or support for the Commission's proposals detailed in this submission, should be considered against those minor corrections/clarifications.

DRAFT 25 MAR 19

## **Responses to Commission Proposal by Division**

*For the purposes of this submission divisions have been listed in the order presented by the Commission in its draft recommendations report, using the names as proposed by the Commission.*

### **Hyperlinks to divisions proposals**

Amesbury South	Amesbury West
Bulford and Amesbury East	Durrington
Etc	Etc
Etc	Etc
Etc	Etc
Etc	Etc
Etc	Etc
Etc	Etc

### **Amesbury**

#### **Amesbury South**

The Council's proposal for this division was accepted by the Commission without variation. The densely packed area, at present a single polling district, will contain very large amounts of new development and it is therefore appropriate that it be represented within a single division as it will be of shared character and style. The proposal also allows for the rest of Amesbury to be divided along appropriate community lines.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

#### **Amesbury West**

The Commission's proposed division modified the Council's proposal to improve electoral equality. It still retains the central part of the town in one division and allows for suitable divisions across the rest of Amesbury, and the Council does not regard the movement of a few streets as suggested as undermining any of the statutory criteria.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

#### **Bulford and Amesbury East**

The Commission's proposed division modified the Council's proposal to improve electoral equality. The sections of Amesbury to be combined with the parish of Bulford have the most similarities in terms of the levels of military housing and share better transport links than other sections of the town to Bulford. (Numbers are being checked for errors to see if the line is appropriate)

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Durrington**

The Commission's proposal accepted the reasoning of both the Council and the local Town Council to create a division dividing the parish of Durrington along the Larkhill area,

as due to significant levels of new and proposed development the parish could not be represented within a single division. The proposal retains the historic core of the town of Durrington in a single division.

The Commission did amend the proposed dividing line to exclude a section of the new military development at Larkhill, using the main road south as the division between Durrington Town and the Larkhill area. Recognising the difficulty of estimating electorates for new military development especially given the very low registration in military housing, the Council accepts the Commission's argument that the main road makes a clearer dividing line between the two divisions, as the Commission is content with the electoral variance.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Avon Valley**

The Commission's proposal for this division accepted the Council's proposals subject to a difference in the line between Durrington town and the Larkhill area. As noted in its original submission the Council continues to support a division combining the rural parishes of the Avon Valley as being of similar character and with close connection, with the inclusion of Larkhill for electoral equality its links into the area from the north.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Till**

The Commission's proposal for this division modified the Council's proposal to exclude the parishes of Steeple Langford and Wylve and include the parishes of Great Wishford and South Newton. While the Council has some concerns that the connections between the parishes of Steeple Langford and Wylve with the parishes to the south is not as great as the Commission suggests it considers, on balance, that the proposals are acceptable as the highly rural areas do share many similar features, electoral equality is acceptable, and no compelling local community objections have been received.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Winterbourne**

The Council's proposal for this division was accepted by the Commission without variation. The inclusion of all Bourne Valley communities in a single division enhances their community identity, and the parish of Durnford, already combined with many of the other parishes in the present division, continues to have very close links with those parishes and ensures appropriate electoral equality.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

## Bradford-on-Avon

### **Bradford-on-Avon North**

The Council's proposal for this division was accepted by the Commission with minor variations. The town divisions are of acceptable size, make broad geographic sense and there are no known negative community implications in the changes of a few streets as suggested by the Commission.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Bradford-on-Avon South**

The Council's proposal for this division was accepted by the Commission with minor variations. As with the above the town divisions are of acceptable size, make broad geographic sense and there are no known negative community implications in the changes of a few streets as suggested by the Commission.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

## **Holt**

The Council's proposal for this division was accepted by the Commission without variation. The three communities while having some links to other areas do still have links with one another, particularly Holt and Staverton, are of similar scale and nature and ensure an overall coherence to the local community areas can be achieved without any negative local community impacts.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

## **Winsley and Westwood**

The Council's proposal for this division was accepted by the Commission without variation. The limited flexibility for any proposed divisions in the area due to the isolation of Limpley Stoke continued to apply, and the proposal would result in an area of unified rural character surrounding the town of Bradford-on-Avon.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

## Calne

### **Calne Central**

The Council's proposal for this division was accepted by the Commission with minor variation. The Council considered the changes proposed by the Commission regarding proposals fronting onto The Green, and does not regard the change as undermining any of the statutory criteria.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Calne Chilvester and Abbert**

The Council's proposal for this division was accepted by the Commission with minor variation with the existing divisions of acceptable electoral equality and no negative community implication. Although no reasoning is provided why Britannia Drive should be included in the proposed Calne South division, the Council does not regard the change as being contrary to any statutory criteria and accepts that the proposal does still align with the local community identity.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Calne North**

The Council's proposal for this division was accepted by the Commission with minor variation with the existing divisions of acceptable electoral equality of continuing good representation of the local community. There were no concerns raised as to the minor changes proposed by the Commission.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Calne Rural**

The Commission's proposed division modified the Council's proposal to include the parish of Cherhill and the Stockton area of Calne, removing the parish of Heddington and areas of Calne Without to the south of the town. Although the Council was uncertain as to why this was proposed, it nevertheless considered that the proposals were acceptable in terms of the statutory criteria with the inclusion of newer development to the south of the town in the new Calne South division.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Calne South**

The Commission's proposed division modified the Council's proposal to include the parish of Heddington and further parts of Calne Without to the south, whilst excluding Cherhill and other areas. As with Calne Rural the Council felt both its proposals and those of the Commission respected the statutory criteria appropriately.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Chippenham**

#### **Bybrook**

The Council's proposal for this division was accepted by the Commission without variation. The various villages and parishes share character, needs and are an established community within the Chippenham hinterland.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**



## **Kington**

The Council's proposal for this division was accepted by the Commission with minor variation. The proposal ensures that the division will remain entirely rural in nature, preserving the nature of the communities within it. Incoming new development which will be an urban extension of the town and thus not share character or interests with the rest of the parish, will be combined within an urban division with whom they will share the same concerns and issues. However, the line as proposed by the Commission does not follow the incoming new development as provided by the Council in maps, and as such would not properly reflect the community interests of residents once in that area as it expands the area of rural parish to be included unnecessarily.

**The Council therefore objects to this proposed division, and requests the section of Langley Burrell Without to be included within the Division follow the line of incoming development as proposed by the Council in its 5 November 2018 submission. The Council supports the name [insert name here] for this division.**

## **Chippenham Cepen Park and Derriards**

The Commission broadly accepted the Council's proposals with only minor variations for this area. It was not considered that the movement of a few streets or parts of streets as proposed by the Commission was contrary to the statutory criteria, and that the division still represented a cohesive urban community with sensible main boundaries along identifiable roads.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

## **Chippenham Cepen Park and Hunters Moon**

The Commission broadly accepted the Council's proposals with only minor variations for this area. As with the other Cepen Park division it was not considered that the movement of a few streets or parts of streets as proposed by the Commission was contrary to the statutory criteria, and that the division still represented a cohesive urban community with sensible main boundaries, in particular by including the Hunters Moon development of the town within a town division.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

## **Chippenham Hardenhuish**

The Commission broadly accepted the Council's proposals with only minor variations for this area. As with both Cepen Park divisions it was not considered that the movement of a few streets or parts of streets as proposed by the Commission was contrary to the statutory criteria. The proposal was a cohesive community and including the area of the parish of Langley Burrell Without which would be an urban extension and would ensure more effective and convenient local government moving forward as unlike already or very newly built development there would not be shared community identity with the rest of its parish by the time of the next elections. The Council is aware of suggestions from Langley Burrell Without parish council, but the Council considers that its own proposal following the line of allocated development is preferred to ensure clusters of houses part of the planned urban extension do not find themselves within the rural division.

**The Council therefore supports this proposed division, subject to the changes as**

**detailed with the Kington proposal. The Council supports the name [insert name here] for this division.**

### **Chippenham Hardens and Central**

The Council was pleased that the Commission accepted its arguments in relation to the Hardens and Central division, with minor variations. The area has good electoral equality, follows clear boundaries and maintains the integrity of the central area of the town without impacting the statutory criteria. The Council did not consider that the minor variations proposed by the Commission undermined those criteria in any way, and continued to support a division including the main central area of the town as being in the best interests of the limited electorate within the area.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Chippenham Lowden and Rowden**

The Commission's proposal amended the Council's submission by vastly expanding the area of Lacock parish to be included with the urban division of Lowden and Rowden, extending the boundary south to the hamlet of Notton and the agricultural college at Lackham.

This proposal is contrary to the statutory criteria of the review. The Council has provided development maps which show the extent of urban extension development at Showell farm, which will be large enough by 2021 to enable the warding of Lacock, and thus to establish an entirely urban division and ensure both effective local governance and community cohesion. This would follow the same pattern and reasoning that the Commission accepted for the Hardenhuish and Monkton divisions, limiting the sections of parish to be included with the town to the new urban extension developments only. The extension proposed by the Commission is also not required to ensure good electoral equality for the division, and therefore the proposal is not necessary to meet or goes against the statutory criteria. The Council did not have objections to the other minor changes proposed.

**The Council therefore objects to the proposed division and recommends that the southern border of the division be as the Council proposed in its initial submission around the new development at Showell farm, while accepting the minor variations in other areas. The Council supports the name [insert name here] for this division.**

### **Chippenham Monkton**

The Commission accepted the arguments of the Council in relation to the Monkton division, with minor variations. The split between it and the Hardens and Central division provided a good community separation between the central area of the town and the Monkton area leading toward the new development at Rawlings Farm in Langley Burrell Without parish, has good electoral equality, and easily meets the requirements of the three statutory criteria.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Chippenham Pewsham**

The Commission broadly accepted the Council's proposals with only minor variations for this area. As with the other Chippenham area divisions it was not considered that the movement of a few areas into the proposed Hardens and Central was significant against

any of the criteria.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Chippenham Sheldon**

The Commission broadly accepted the Council's proposals with only minor variations for this area. There were changes in the boundary between it and Lowden and Rowden and Harden and Central, which were not considered to be so significant as to be contrary to any statutory criteria.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Corsham**

#### **Box**

The Commission accepted the Council's proposals for Box with minor variation which had no impact on issues of community and governance, and seemed in relation to a clearer division line. The inclusion of Box parish in multiple divisions was required due to both community and geography and the size of Colerne parish also a part of the division.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Corsham Pickwick**

The Commission made a series of large changes to the Council's proposals in this area. A number of areas proposed to be within the Corsham Without division were instead moved into this division around the Hudswell area, and the Council accepts that this makes an amount of community sense. The Council has some concerns about the effective community balance of the proposals in combination with Corsham Town in respect of the character and feel of the areas being divided between them. However, after much consideration the Council is prepared to accept that the proposals are not contrary to the criteria of the review.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Corsham Town**

The Commission made a large series of changes to the Council's proposals in this area, as also noted with the Pickwick division. The same concerns about the effective community balance with residential and civic areas in respect of the character and feel of the areas being divided between them remained. However, again after much consideration the Council is prepared to accept that the proposals are not contrary to the criteria of the review.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Corsham Without**

The Commission made a number of changes to the Council's proposals. The Council accepted that the area around Summerleaze, Hudswell and Long Ground could reasonably be included with more town orientated divisions in terms of overall community cohesion. However, the Commission's proposals at Notton and Lackham are as detailed

under Lowden and Rowden both unnecessary and inappropriate under the statutory criteria. This would create parish wards with one entirely rural and another part urban and part rural, when the Council's proposals would see an entirely urban and entirely rural set of wards, a far more suitable community and governance arrangement.

**The Council therefore recommends the division be accepted as per the Commission's proposal subject to the Notton and Lackham areas of Lacock being retained, and the boundary with the Chippenham Lowden and Rowden division being around the Showell Farm new development as detailed in the Council's submission.**

#### Devizes

##### **Bromham, Rowde and Roundway**

The Commission broadly accepted the Council's proposals subject to minor variations. The size of Devizes parish required the division be split, and the Roundway area was the most appropriate in linking with the villages to the west of the town. No concerns were raised in relation to the minor changes to provide a clearer boundary.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

##### **Seend, Potterne and Poulshot**

The Commission accepted the Council's proposals for this area without variation. The electoral equality was within the acceptable range, the combined villages were of similar scale and character, and had reasonable links as smaller communities sat between several other much larger conurbations in the area.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

#### Devizes East

The Commission broadly accepted the Council's proposals subject to minor variations. It was accepted that the area west of Windsor Drive could be moved as suggested in the proposals without compromising governance or identity, and electoral equality continued to be acceptable.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

#### Devizes North

The Commission broadly accepted the Council's proposals subject to minor variations. The nature of the communities as exist within the town were not felt to have been undermined by the proposals, and as such the Commission's recommendations were in line with all three statutory criteria, although some concerns did remain that the division was quite small, and had limited opportunity for new development.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

#### Devizes South

The Commission broadly accepted the Council's proposals subject to minor variations. As with the other two wholly town divisions it was not considered that those variations were contrary to any statutory criteria and that effective governance and community identity

were maintained

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **The Lavingtons**

The Council's proposals for this area were accepted without variation. The villages are very closely connected with substantial community links particular between the two Lavingtons, and the proposal achieves acceptable electoral equality.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Urchfont and Bishops Cannings**

The Council's proposals for this area were accepted without variation. The proposal retains the combination of the two very large parishes of Urchfont and Bishops Cannings along with a number of close by associated parishes and it represents an effective community and governance proposal.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Malmesbury**

#### **Brinkworth**

The Council's proposals for this area were accepted without variation. The connections between the parishes are very high, are isolated from other areas to the east and south, and have good electoral equality.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Minety**

The Council's proposals for this area were accepted without variation. The area is geographically isolated from other areas, of shared character and easily meets the criteria for the review on community and governance grounds, being an overwhelmingly rural area with close links.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Malmesbury**

The Commission made significant variations to the Council's proposals for this division. The Commission acknowledged its default position of not recommending 'doughnut' divisions entirely surrounding another, but accepted the Council's arguments that the existing doughnut should be retained, whilst also accepting that the entire parish could not be contained in a single division due to electoral equality.

Unfortunately, the Commission's proposal appears to be contrary to the other statutory criteria of the review. The proposals argue that there is less community impact from dividing a part of the Tetbury Hill area than by dividing the historic centre of the ancient town and including it within a Sherston division. This argument does not withstand reasonable analysis. The community and governance impact from dividing very new or still to be built estates, as was the Council's proposal with the Tetbury hill area, is

objectively less than doing so to established communities.

The Commission's proposals also ignore the direct road links from the area proposed to be moved by the Council and the parish of Brokenborough, which shares a Neighbourhood Plan with Malmesbury. The Commission proposals by contrast are considerably more arbitrary and result in some areas being isolated in tiny polling districts which decreases the effectiveness of the local governance and administration in that area.

Given the better road links and nature of the new communities that were suggested to be moved with the Council's proposal, it is less disruptive to the community than excising the historic centre of the town to a division apart from the town.

The Commission's proposals therefore are of sound electoral equality but so not align with the criteria on community or governance grounds. The Council has considered the reasoning provided by the Commission and has made some adjustments to its original proposal to alleviate some of the concerns the Commission felt. This will be set out further in the supplementary document.

The Commission also requested comments relating to the area being a two-member division, despite receiving no representations on this point. For the avoidance of doubt the Council's strong view is that any combination of single member divisions would be superior in both community and governance terms, especially when nowhere else in the council area would have such an arrangement, and which would appear to be proposed as purely mathematical exercises which are wholly unnecessary in this instance when suitable community proposals exist. It is therefore recommended that the Commission not deviate from the general pattern of single councillor divisions.

**The Council therefore objects to the Commission's proposals and recommends that a revised proposal as set out in the supplementary evidence pack be adopted. The Council supports the name [insert name here] for this division.**

### **Sherston**

The Commission accepted the Council's proposal for this area subject to changing the section of Malmesbury to be included within it. As detailed above the Council believes the Commission's proposals are contrary to the statutory criteria for the reasons outlined, and has put forth an alternative which better reflects the community identity of the ancient town and adjoining parishes.

**The Council therefore objects to the Commission's proposals and recommends that a revised proposal as set out in the supplementary evidence pack be adopted. The Council supports the name [insert name here] for this division.**

### **Marlborough**

#### **Marlborough East**

The Council's proposals for this area were accepted subject to minor variations to the sections of town to be in either the east or west divisions. The parishes to be included have strong links to the town, and the Council had no objection to the minor changes of a few streets as none of the changes would be contrary to the statutory criteria by harming the community links or affecting governance.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Marlborough West**

The Council's proposals for this area were accepted subject to minor variations in the town area. The large number of small parishes are of very similar character and make for appropriate combination in a division, the small changes in the town do not impact governance or community in any way, and the Council continues to believe Broad Hinton and Winterbourne Bassett fit more appropriately with the Lyneham division, in addition to being required for reasons of electoral equality. Broad Hinton directly connects to Broad Town, is a joint parish with Winterbourne Bassett, therefore on balance the pair do not share the same level of cohesive community identity with the other parishes in the area.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Ramsbury**

The Council's proposals for this area were accepted without variation. The connection of large and small villages at the edge of the county make for a cohesive community of similar character and there are no governance concerns.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Melksham**

#### **Melksham Berryfield and Rural**

The Council's proposals for this area were accepted without variation. It is worth noting, however, that there is not a main road link as suggested in the Commission report between Broughton Gifford and the other areas of the division, and that people must travel into the town and out again to access the other areas. This is important when considering other divisions and how communities can be suitable even without such connection, if there are no better alternatives.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Melksham Bowerhill**

There were major changes to the Council's proposals for this division and others in the Melksham area. This has resulted in an unnecessary increase in the number of divisions which are a mixture of urban and rural, which the Commission has accepted elsewhere as not being in the best interests of community identity or effective and convenient local governance. Indeed, the Commission has directly criticised the Council for suggesting such an approach in Warminster and the Council has accepted the Commission's reasoning in that regard. There are no unique factors in the Melksham area to explain why in this instance such a mixture is suitable. It is also noteworthy that while there are under both the Council and the Commission's proposals several divisions at the upper end of acceptable electoral variance, the Commission's proposals have worse electoral equality on top of being in contradiction with other statutory criteria.

For the Bowerhill division itself the Commission's proposals would seem to be an attempt to create a slightly more urbanised division than that proposed by the Council. However, suggestion to include the new development in polling district FW2 within the Melksham East division ignores that not only will this area be immediately adjacent to the town, it is an extension of the existing town estate running from the north, with shared road names already prepared, a community centre and more. This is not an extension of Bowerhill,

but an extension of the town of Melksham, and dividing it from the area it is an extension of is not a sound proposal on community grounds. This extension is in part contributing to the new primary school adjacent to the local shopping centre and the planned community centre, and completely distinct from Bowerhill.

The edge of the division as proposed by the Council is to be the main road that will form the border of the built-up edge of the town, a clear physical boundary by any definition. By contrast, the proposal of the Commission will see a new section of estate with hundreds of residents who can only access the rest of the division by passing through two separate town divisions. Unlike the Broughton Gifford and Berryfield proposal this is not required for electoral equality, and causes additional negative community and governance issues around the town and the Melksham Without parish.

While the inclusion of the Sandridge area of Melksham Without parish with another division is not inherently unacceptable as it could in theory be combined with other parts of the parish to retain its edge of town rural community nature, the Commission's proposals to separate it from Bowerhill ensure it is dominated by the urban division, and electoral equality means it cannot be included with the northern parts of the parish where it shares character such as Shaw and Whitley.

Therefore, the Council argues, with further evidence in the supplementary pack, that the proposal for Bowerhill does not provide for a decent community division because of the separation of an urban extension from the distinct community of Bowerhill, and the creation of an unnecessary urban/rural division in Melksham East which does not include all parts of a single estate. The Council's proposals on the other hand ensures the new development will be combined with the area it is an extension of, and minimise the division of Melksham Without parish to that which is necessary and appropriate given the statutory criteria.

**The Council therefore objects to the proposed division and recommends the adoption of its proposals as submitted on 5 November 2018 for the reasons set out there, above and with further evidence in the supplementary evidence pack. The Council supports the name [insert name here] for the division with the boundaries as suggested.**

### **Melksham East**

There were major changes to the Council's proposals as also noted above, and also encompassing further parts of the rural parish within the division from the Council's proposed Melksham North.

The Council would suggest that creating a division which divides the parish not due to incoming urban expansion but by sticking a small rural section into an area dominated by a different, urban parish, is far less acceptable set against the statutory criteria than the Council's proposal to include new urban development within a town division. This has been accepted by the Commission in many other instances, and there are no unique factors which explain why it is inappropriate on community grounds for Melksham. As noted for the Bowerhill area the Commission's proposals there, even using the Commission's preferred approach of road links, do not make community sense given the FW2 housing is an extension of an existing town estate, as is the incoming development at FW1 which the Commission have included with a town division.

It is simply unnecessary to divide up the parish of Melksham Without in the manner proposed, as the rural areas can, with the exception of one because of electoral equality,



be included within other entirely rural divisions. Given the scale and nature of Melksham Without parish, separation into multiple divisions is essential, but this must be done in recognition that the elements of the parish which are not part of the urban extension fit better together than not.

**The Council therefore objects to the proposed division and recommends the adoption of its proposals as submitted on 5 November 2018 for the reasons set out there, above and with further evidence in the supplementary evidence pack. The Council supports the name [insert name here] for the division with the boundaries as suggested.**

### **Melksham Forest**

There were minor changes to the Council's proposals, with an area siphoned off to the greatly expanded Melksham North division. Whilst the Council had some concerns about where the new lines were drawn it might have been able to accept the proposals as not being directly contrary to the criteria, unfortunately in combination with other divisions in the area it would not be possible to not object to the proposed Forest division given the wider impact. It should be noted that the Council's own proposal ran along main roads and the river, which have been used as clear, sensible boundaries elsewhere in the town. The Council did accept the minor change at Coronation Road was an acceptable proposal by the Commission.

**The Council therefore objects to the proposed division and recommends the adoption of its proposals as submitted on 5 November 2018 for the reasons set out there, above and with further evidence in the supplementary evidence pack, subject to the minor change at Coronation Road. The Council supports the name [insert name here] for the division with the boundaries as suggested.**

### **Melksham North**

There were major changes to the Council's proposals. The town centre has been included with the parish of Melksham Without, a proposal which cannot be regarded as aligning with criteria of effective local government or community cohesion. The interests and needs of the centre of the town are vastly different to the parishes, whilst the Council's proposal struck the right and appropriate balance given the necessity of some combination of rural and urban given the needs of election equality. The focus on the line of the River Avon does not recognise that the Council also used a river as a boundary between North and South, so when comparing the two proposals it is essential to see the wider impacts, and the Commission's inclusion of the centre of the town with the rural parish undermines the wider community argument far more than with the Council's proposal.

The Council's proposal by contrast combined the rural villages of Whitley, Shaw and Beanacre with newer housing at George Ward gardens and the Shurnhold area. These areas have a cohesive community at the north of the town, and there are many in the area who utilise community spaces and groups in Shaw and Whitley, with many children in the area going to the primary school at Shaw. The town and parish work together in this area on matters such as flood alleviation and playing fields, whereas in the Commission proposal a region on the other side of the river and railway line is included which faces entirely different issues and, crucially, does not have the same level of interaction with or partnership with the parish.

It is noteworthy that the town and parish both support this proposal because they feel it is the most appropriate community proposal within the electorate limits allowed. Such

strong support from those based within the community is a highly relevant factor.

**The Council therefore objects to the proposed division and recommends the adoption of its proposals as submitted on 5 November 2018 for the reasons set out there, above and with further evidence in the supplementary evidence pack. The Council supports the name [insert name here] for the division with the boundaries as suggested.**

### **Melksham South**

There were minor changes to the Council's proposals. Whilst not as contrary to the criteria as some of the other Melksham proposals the wider implications that would arise in North and East were the Commission's proposals confirmed means that the Council must object to the South proposals, subject to the changes proposed at Coronation Road which it is accepted align well with the statutory criteria.

**The Council therefore objects to the proposed division and recommends the adoption of its proposals as submitted on 5 November 2018 for the reasons set out there, above and with further evidence in the supplementary evidence pack, subject to the minor change at Coronation Road. The Council supports the name [insert name here] for the division with the boundaries as suggested.**

### **Pewsey**

#### **Pewsey**

The Council's proposals for this area were accepted without variation. The very strong community connections of the entire vale area, suitable electoral equality and wide range of effective local governance in place make it an entirely appropriate division.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Pewsey Vale East**

The Council's proposals for this area were accepted without variation. The very strong community connections of the entire vale area, suitable electoral equality and wide range of effective local governance in place make it an entirely appropriate division subject to the movement of only a few parishes as agreed by the Commission.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Pewsey Vale West**

The Council's proposals for this area were accepted without variation. The very strong community connections of the entire vale area, suitable electoral equality and wide range of effective local governance in place make it an entirely appropriate division subject to the movement of only a few parishes as agreed by the Commission.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Royal Wootton Bassett and Cricklade**

#### **Cricklade**

The Council's proposals for this area were accepted without variation. The area is isolated from other regions limiting the flexibility of different proposals, has strong bonds between its three parishes and has excellent electoral equality.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

**Purton**

The Council's proposals for this area were accepted without variation. Retaining the entire parish of Purton, with the tiny encircled parish of Braydon, in a single division is the very definition of a proposal suitable on community and governance grounds.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

**Lyneham**

The Council's proposals for this area were accepted subject to the inclusion of the parish of Broad Town. The Council accepts the strong road and other links to the rest of the proposed division rather than parishes to the north, and had considered such an arrangement previously and as such raises no objection to the Commission's proposal.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

**Royal Wootton Bassett East**

The Council's proposals for this area were accepted subject to the omission of Broad Town. The Council accepts this proposal and the continued inclusion of the Lydiards with the section of the town proposed for the purposes of electoral equality.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

**Royal Wootton Bassett North**

The Council's proposals for this area were accepted without variation. The town was divided along as suitable community grounds as was possible and the sub-division into three raised no objections as it replicated the existing arrangement with minor modification.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

**Royal Wootton Bassett South and West**

The Council's proposals for this area were accepted without variation subject to amending the name to south and west. The town was divided along as suitable community grounds as was possible and the subdivision into three raised no objections as it replicated the existing arrangement with minor modification.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

**Salisbury and Southern**

**Salisbury Bemerton Heath**

The Commission broadly accepted the proposals of the Council with some minor variations. The Council accepted that a clear sub-division of this area is difficult to identify, and that it felt its own proposals attempted to distinguish between the character of the area and the parts of 1950s and 1980s housing. Ultimately, the Council accepted

that the Commission's proposals are not contrary to the statutory criteria, however it would request that the area around the church of St Michael be included with the Bemerton Heath division, as it has traditionally been a significant part of that community and it would be appropriate to include it.

**The Council therefore supports this proposed division subject to the minor change detailed above. The Council supports the name [insert name here] for this division.**

### **Salisbury Fisherton and Bemerton**

The Commission broadly accepted the proposals of the Council with some minor variations to various roads between it and Bemerton Heath. As with the above the Council is willing to accept the proposal as in line with the statutory criteria.

**The Council therefore supports this proposed division subject to the minor change detailed above. The Council supports the name [insert name here] for this division.**

### **Salisbury Harnham West**

The Commission broadly accepted the proposals of the Council with variation by extending the area of Netherhampton parish to be included with the city based division. This suggestion is unnecessary for electoral equality and is not appropriate on community governance grounds. The Council's proposed line included the entirety of proposed development in the area, as is the case with similar areas around Chippenham and Trowbridge, and maps have been provided to the Commission to demonstrate this. The Commission's proposals to align to alleged geographic features is therefore unnecessary, incorporates a small number of rural based electors in this otherwise entirely urban division, and so does not represent convenient governance. The Council does, however, accept that the Harnham slope area is largely looked after by local residents in the city, and accepts the suggestion to include this area with the proposed division.

**The Council therefore objects to the proposed division and recommends that the western border of the division be as the Council proposed in its initial submission around the new development, while accepting the minor variations around the area of the Harnham slope. The Council supports the name [insert name here] for this division.**

### **Salisbury Harnham East**

The Commission accepted the proposals of the Council without variation. The Council continues to support the proposal as a reasonable defined community and sub-division of the wider Harnham area, which is necessary as a result of electoral equality.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Salisbury St Edmund**

The Commission accepted the proposals of the Council without variation. The Council continues to support the proposal as a reasonable defined community in the broad centre of the city, which also allows for better community proposals in Milford and Harnham.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Salisbury St Pauls**

The Commission accepted the proposals of the Council without variation. The Council

continues to support the proposal as a reasonable defined community in the broad centre of the city, which also allows for better community proposals in Edmund and Harnham.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Salisbury St Francis and Stratford**

The Commission broadly accepted the proposals of the Council with minor variations to define the boundary. The Council continues to support the proposal as a reasonable defined community between major rivers leading into the city, and which fits appropriately within the wider proposal.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Old Sarum and Laverstock North**

The Commission proposed an entirely different division compared to the Council's proposals. Unfortunately the Commission's proposals are unacceptable when judged against the statutory criteria of community cohesion and effective and convenient local government, are inconsistent even within just this one division, and have significant negative knock on effects on the wider communities.

To begin with the unacceptability of the Commission proposals before expanding on why the Council's alternatives align better with the statutory criteria, the proposals make a great deal of it not sub-dividing the Old Sarum area, which is a section of the parish of Laverstock & Ford. In order to avoid sub-dividing the Old Sarum area, the Commission propose instead to both separate the Bishopdown Farm area of the parish and subdivide the Laverstock village part of the parish.

No reasoning is provided as to why it is unacceptable to subdivide Old Sarum but acceptable to subdivide the other two areas of the parish, nor why the historic village part of the community can acceptably be divided in what appears an entirely arbitrary fashion as no community or governance explanation is made. The Council would suggest that subdividing an area of predominately newer housing, and doing so such all the parish is contained within only two divisions, is far more logically coherent on a community basis than sub-dividing the far more established communities of Bishopdown Farm and Laverstock, and furthermore in connecting them with a city parish.

This would not be a sensible arrangement for effective governance or community cohesion. A councillor would find it extremely difficult to represent such an area effectively as there are very strong competing interests between the two, as seen in the governance review, which included a survey of the entirety of Laverstock & Ford parish in which overwhelmingly stated they did not wish to be absorbed into the city. While an electoral review will not absorb the parish, the combination of these two areas, with their unique community history, for unitary governance is not appropriate, it is not necessary for electoral equality, and there is no coherency in sub-dividing a parish into three parts when it is possible to do so in only two, without combining it with an area to which it has considerable tension.

Sheer physical proximity and 'looking to' the larger settlement of Salisbury does not mean no community connections exist with those areas that exist further from the city itself, as it is about character and interests. Indeed, the Commission's own proposals recognise this by including Clarendon Park with part of Laverstock & Ford and the city in the Milford

division. If it is considered that an extremely large, rural parish of circa 200 electors shares more community connection with an estate of the city on the other side of a major village parish, it is certainly the case that the larger part of Old Sarum shares connections with the Bishopdown Farm area *of its own Parish* and that the remainder of Old Sarum fits perfectly contently with Ford and historic Laverstock village along with Firsdow and Clarendon Park.

The Commission's proposal in this area seems to be entirely the result of accepting the existing Salisbury St Marks and Bishopdown division when the Commission is quite rightly clear you must begin with a blank map rather than just accept an old division which, in this case, is no longer appropriate, and pays no attention to the local governance of the parishes as building blocks where possible, as it is here. The proposal is also the result of an incorrect categorisation of Britford parish as will be detailed in the next division response, pays no heed to the supporting representation of the parish council, and has a lack of recognition that areas can share community identity even with limited road links.

The proposals are therefore contrary to the statutory criteria. The Council's proposals, by contrast, ensure a division entirely made up of a single parish. A single parish division is by definition more suitable on community grounds than one which, due to its impacts elsewhere, arbitrarily divides other parishes or the same parish. While the links between Longhedge and the Bishopdown Farm area are not direct, the simple fact is that they are a part of the same parish and therefore have community connection, and while the Longhedge development is new development, it does not sit alongside the urban extension of the city but other parts of Laverstock & Ford Parish. It is therefore correct that it not be included with a city division as with examples such as at Netherhampton, but the same applies to Bishopdown Farm, which is not incoming new development but established housing with established identity as part of Laverstock & Ford parish.

It is very notable that both Laverstock & Ford Parish Council and Salisbury City Council support the Council's proposals in this area, given the extent of historical disagreement between them. This is because the Commission proposals are unacceptable to both communities and this must be recognised.

**The Council therefore objects in the strongest possible terms to the Commission's proposals for this division, and restates its proposals as submitted on 5 November 2019 for the reasoning set out in the that submission, above and in the supplementary evidence pack. The Council supports the name [insert name here] for this division with the boundaries it proposed.**

### **Salisbury Milford and Laverstock South**

The Commission proposed an entirely different proposal for this area, which has suitable electoral equality. Unfortunately, this is achieved through wholesale ignoring of the other statutory criteria by seeking to avoid the sub-division of one part of Laverstock & Ford parish by sub-dividing it multiple more times elsewhere without any community justification.

The carving of the historic village of Laverstock in two has no justifiable community cohesion basis, particularly when the southern part is then joined with an area of the adjacent but separate city with which there is a great level of historic tension which makes effective governance harder. It is of note that the Commission refer to this area of the city as the parish of Milford, when it has not been parished in well over 100 years. Leaving that aside, however, there are no geographic dividing lines in the village of

Laverstock, and no community basis for its division.

There is an overemphasis on road links as though the only criterion for what defines a community is a road link, and this is the explanation given as to why Britford cannot be included with Clarendon Park and therefore, instead, the parish of Laverstock & Ford must be sub-divided into three constituent parts, each with an established community. This is not a position which is supported by the situation on the ground or the requirements of the review. If it were the case then it would be a legal requirement that a division be entirely joined by roads. It is not, because it is recognised that so long as contiguousness is maintained as required by law, it is perfectly possible for two areas to make an appropriate community even without road links.

Indeed, the Commission has itself accepted this argument without objection in a division immediately adjoining its proposed division, as Downton and Whiteparish, whilst appropriate together due to their similar scale, nature, character and interests, do not share a road link. This is the case in other areas as well, and indeed within a parish itself communities do not always link up directly, as in Melksham Without, and Malmesbury to Pauls Without. The Commission's assertion therefore that Britford cannot possibly share community connection with other parishes encircling the city, with whom they share interests as all of them 'look to' Salisbury, is not supported by evidence, its own proposals and reasoning and does not stand up to even minor scrutiny.

It cannot be regarded as a lesser community impact to include a parish slightly apart from some others than to ignore parishes as building blocks and ignore significant strength of community feeling by dividing a parish into three unnecessarily. It is also not the case that Britford is part of the Chalke Valley geographically or in community terms, so inclusion in Fovant would be of even less community cohesion than if it were joined to Clarendon Park.

As the housing at Bishopdown Farm and Laverstock are both very well established, it is not at all similar to situations in other towns, or indeed Harnham West, where not yet built properties are joined with the town or city.

The Commission's proposals are therefore regarded by the Council as not in accordance with the statutory criteria of the review. The Council's proposal, by contrast, retains the historic core of Laverstock & Ford parish, combined with parishes that all 'look to' the city, as all parishes in the area do, but which share their discontent at the prospect of being joined with the city in a division. The Council does, however, accept that Odstock parish is geographically and in community terms separated from those included in its own proposal. It therefore accepts that this parish could fit better with either Downton, to which it is currently joined in a division, or the Fovant division, even though it too is strictly speaking beyond the limits of the Chalke Valley.

**The Council therefore objects in the strongest possible terms to the Commission's proposals for this division, its proposals as submitted on 5 November 2019 for a Laverstock, Firsdawn, Clarendon Park and Britford division for the reasoning set out in the that submission, above and in the supplementary evidence pack, subject to Odstock being moved to a Chalke Valley division and minor variations at Old Sarum. The Council supports the name [insert name here] for this division with the boundaries it proposed.**

#### **Salisbury St Marks and Bishopdown**

The Commission has proposed an entirely different division to that proposed by the

Council. The reasons for the unacceptability of this division have been set out in the responses to previous division proposals above, but additionally the only justification for the division would appear to be that it already exists, something the Commission is very keen to emphasise, quite rightly, is not a positive argument for the existence of a division.

After considerable assessment of community feeling the Council moved Bishopdown Farm, which has good roads links and footpath connections with both Hampton Park and Riverdown Park developments, into Laverstock & Ford parish because although it is quite an urban area it is very established housing with strong community representation in the parish. The Commission has ignored the recent governance review which identified the Bishopdown Farm are as distinct from the city, and that parishes should where possible be used as building blocks, resulting in a division unnecessarily splitting a parish as a necessity based on erroneous analysis of the suitability of Britford parish being included with another rural parish.

The Council's proposal, by contrast, creates an entirely city based division of two distinct communities in the same manner of the Trowbridge Lambrook division, and is therefore almost by definition more suitable than the Commission's proposal, which assumes it impossible for a parish with an established community to exist separate to a city.

**The Council therefore objects in the strongest possible terms to the Commission's proposals for this division, and restates its proposals for a Salisbury and Milford Division as submitted on 5 November 2019 for the reasoning set out in the that submission, above and in the supplementary evidence pack. The Council supports the name [insert name here] for this division with the boundaries it proposed.**

#### **Alderbury and Winterslow**

The Commission accepted the Council's proposal without variation. Given the geographic constraints, county boundary and electoral equality requirements, no other more suitable community proposal has emerged. The concerns of Firsdown parish of not being included with Winterslow are acknowledged, but the scale of the parish simply does not allow for its inclusion with Winterslow and adjustments of any other parishes significantly impacts other proposals.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

#### **Downton and Whiteparish**

The Commission accepted the Council's proposal without variation. The Council notes, however, that given the concerns of the Commission regarding Odstock, it could reasonably be included given its closeness to Downton, while keeping the division at acceptable electoral equality. However, the Council is minded to retain the division as proposed as Odstock could fit elsewhere. It is noteworthy that Downton and Whiteparish combine in a division well, being of very similar scale and nature, despite the lack of direct road connection.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

#### **Redlynch and Landford**

The Commission accepted the Council's proposal without variation. The electoral quality is acceptable and the two parishes are very closely linked through the shared National



Forest connection. For the avoidance of doubt, the Council continues to state that it does not believe a two-member division would be appropriate in any circumstances.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

#### South West Wiltshire

##### **Fovant and Chalke Valley**

The Commission broadly accepted the Council's proposal but included Odstock and Britford and excluded Compton Chamberlayne and Tollard Royal. The inclusion of Britford aligns to no statutory criteria as it is under no definition geographically a part of the Chalke valley and shares no community cohesion with them in any way, especially as the housing in the parish is far closer to the city. Odstock also sits outside the valley but theoretically could be accepted as not too negatively affected in governance terms if this was necessary for electoral equality.

Subject to that electoral equality the Council accepts that Tollard Royal, inasmuch as it relates to any Wiltshire areas, fits better with the Tisbury division than Fovant as the Commission suggests. In relation to Compton Chamberlayne it is noteworthy that all parishes along that main road 'look to' the east, as they also 'look to' the west. However, in the absence of local community objection, the Council is raising no objection to its inclusion with Nadder and East Knoyle.

Furthermore, the parish of Netherhampton is sandwiched between the city of Salisbury and Wilton, and was included with the division for purposes of electoral equality. With the inclusion of Odstock the numbers allow for the section of the parish not included with Salisbury Harnham West, to be combined with Wilton, with whom there is a far greater community connection.

**The Council therefore objects to this proposed division and requests that Britford be excluded and instead remain with Laverstock, and that the section of Netherhampton not included with Salisbury Harnham East be included with Wilton. The Council supports the name [insert name here] for this division.**

##### **Nadder and East Knoyle**

The Commission broadly accepted the Council's proposal but amended which parishes should be included or excluded. As detailed under the Till division the Council has some concerns between the linkage between Wylde and Steeple Langford and the parishes to the south, but raised no objection due to the lack of community concerns raised locally.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

#### **Wilton**

The Commission accepted the Council's proposal without variation. The two parishes which are included are inextricably linked. There are therefore no grounds to object on any statutory criteria. However, as a result of Commission proposals to include Odstock with Fovant and Chalke Valley, which the Council is accepting, the electoral equality of that division allows the section of Netherhampton parish not combined with the Salisbury Harnham West division, to be included with Wilton instead. The parish is isolated from the rest of the Fovant division and was included for reasons of electoral equality, and it has far greater community connection with Wilton.

**The Council therefore objects to this proposed division and requests that the section of Netherhampton parish not included with Salisbury Harnham West be included within it. The Council supports the name [insert name here] for this division.**

### **Mere**

The Commission accepted the Council's proposal without variation. The area is geographically isolated, a close-knit community which looks as much to Dorset as some parts of Wiltshire. With acceptable electoral equality it makes for a very appropriate division. Although there are some historic connections with Maiden Bradley with Yarnfield, the parish has for some time developed closer community connections through the council's administrative arrangements with the Warminster area.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Tisbury**

The Commission accepted the Council's proposal with the inclusion of Tollard Royal. The Council accepts that, in this case, the road links better to Tisbury and there are no opposing reasons as exist in some areas as to why the parish should remain in the Fovant division, subject to any electoral equality requirements.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Tidworth**

#### **East Tidworth and South Ludgershall**

The Commission proposed an east west dividing line rather than a north south dividing line for Tidworth as recommended by the Council. Having assessed the proposals, the Council is content to accept the proposals as on balance adhering to the statutory criteria, with the main road north to south a clear barrier for the divisions, recognising the difficulty in assessing the number and location of any military electors within the parish. The combination with Ludgershall is both historic and still appropriate given the similarity between the towns.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

#### **Tidworth North and West**

As noted above the Commission proposed an east west dividing line rather than a north south dividing line for Tidworth as recommended by the Council. Having assessed the proposals, the Council accepts the proposals as being reasonable on both community and governance grounds.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

#### **Ludgershall North and Rural**

The Commission accepted the Council's proposal without variation. Some combination of towns and parishes was necessary in this area due to electoral equality, and it continues to be considered the rural parishes in the area have their closest connections with the northern part of Ludgershall.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

Trowbridge

**Hilperton**

The Commission accepted the Council's proposal without variation. As a division composed of a single, highly distinct parish, the proposal makes for an excellent division across all the statutory criteria.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

**Trowbridge Adcroft**

The Commission accepted the Council's proposal without variation. The proposal aligns as much similar housing and communities as possible under electoral equality and is suitable against all statutory criteria.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

**Trowbridge Central**

The Commission accepted the Council's proposal without variation. The area contains the broad centre of the town and as many associated areas as necessary for electoral equality without any community concerns raised.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

**Trowbridge Lambrok**

The Commission accepted the Council's proposal without variation. The division comprises two distinct communities within the town with suitable connections and good electoral equality.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

**Trowbridge Paxcroft**

The Commission accepted the Council's proposal without variation. The proposal includes areas transferred into the town parish in the recent governance review and includes the large defined estate of Paxcroft as its core.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

**Southwick**

The Commission accepted the Council's proposal with minor variation. The Council's argument was centred on retaining the rural nature of the division whilst achieving electoral equality, and therefore provide the most effective local governance by including planned new development with the urban areas of the town. Other proposals would have necessitated the whole of other parishes be combined with the town, or parts of parishes which make less community sense to be combined than the incoming new development.

The Council had included the area of the business park in its proposal, and the

Commission has instead suggested following the route of the main road to also encompass the new development to the east of the business park. The Council accepts this revised boundary makes sense from a governance perspective, although it is aware of representations that do not include the new development east of the business park. The Council continues to feel the new housing by its character will be more in keeping within an urban based division and therefore continues to feel it should be included within the Drynham division. However, while understanding the desire for a cleaner division line, as the Commission itself has done in other areas the Council is suggesting the line between the two division run behind the back of houses fronting onto Woodmarsh and Westbury road, as these are a core part of the approach into North Bradley village and integral to its community, and so should not be represented in a separate unitary division

**The Council therefore objects to this proposed division, and recommends a revised boundary line as detailed in the supplementary pack. The Council supports the name [insert name here] for this division.**

### **Trowbridge Drynham**

The Commission accepted the Council's proposal with minor variation to include the areas detailed under the Southwick response. The Council broadly accepts the arguments of the Commission in relation to the inclusion of the business park. The reasoning to include areas of urban expansion in order to preserve the rurality of the parishes in the wider area continues to apply. As urban expansion the new housing will share character, feeling and interests with the urban division rather than the historic core of North Bradley village and the parishes of Southwick and West Ashton. However, while the proposed line is neater than the Council is suggesting, it encompasses historic houses along the Woodmarsh and Westbury Road which are very much a part of the village proper, which despite close proximity to incoming development will be distinct in appearance and character.

**The Council therefore objects to this proposed division and proposes a division line as detailed in the supplementary pack (along the back of houses along Woodmarsh and Westbury road). The Council supports the name [insert name here] for this division.**

### **Trowbridge Grove**

The Commission accepted the Council's proposal with minor variation at Cavell Court. The Council has no objection against the statutory criteria for this proposal.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Trowbridge Park**

The Commission accepted the Council's proposal without variation. The reasoning to include areas of urban expansion in order to preserve the rurality of the parishes in the wider area continues to apply.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

### **Warminster**

#### **Warminster Rural**

The Commission did not accept the Council's proposals for some level of merger for most of the divisions between urban and rural, reasoning which the Commission have adhered

to everywhere but Melksham and Westbury.

The Council accepts the broad arguments of the Commission in respect of the proposed Rural Division, but felt the split of parishes between it and Wylve Valley was unbalanced, and that the Rural division was still dominated by the urban area which was not appropriate or cohesive from a community perspective.

It is proposed that the parishes of Horningsham and Maiden Bradley with Yarnfield be included with the proposed Warminster Rural division. Horningsham has close road links with Corsley and no other reasons it should not be included with it as is the case with some other areas (such as Britford with Laverstock), which in turn link with Maiden Bradley with Yarnfield, which is relatively isolated from any other Wiltshire parishes.

The Deverell Valley is a distinctive geographic feature so splitting the above parishes from the rest of the proposed Wylve Valley division is appropriate in community terms and reduces the physical scale of the division. This would also create a better balance of urban and rural in the Warminster Rural division.

This alone would still be an acceptable sized division for electoral equality, however the Council does also recommend changes to the area around The Weir and Ash Walk. Both these areas are accessed from the Warminster West and Warminster East divisions as proposed by the Commission respectively, and moving them to those divisions would improve the equality of Rural without exceeding it elsewhere and make more governance sense given the access is from other divisions

**The Council therefore objects to the proposed division and recommends that the parishes of Horningsham and Maiden Bradley with Yarnfield be included, and the sections of Warminster detailed above and in the supplementary evidence pack be excluded. The Council supports the name [insert name here] for this division.**

#### **Warminster Broadway**

The Commission made major changes to the Council's proposals. This included keeping the division closer to its current composition, and the Council has no objection under the statutory criteria as it recognises the southern area of the town as a cohesive community.

**The Council therefore supports this proposed division. The Council supports the name [insert name here] for this division.**

#### **Warminster East**

The Commission made major changes to the Council's proposals. This was largely as a result of the Commission not accepting the Council's suggestions for which areas of Warminster should be included with certain parts of the town, which the Council accepts is justified on community and governance grounds.

However, as detailed under the Rural division there is an area around Ash Walk which is isolated from the proposed Rural division and accessible only through East, and so it is proposed the area be included with the East Division.

**The Council therefore objects to the proposed division and recommends that the area around Ash Walk be included above and as detailed in the supplementary evidence pack. The Council supports the name [insert name here] for this division.**

#### **Warminster West**

The Commission made major changes to the Council's proposals, but as detailed above the Council accepts the Commission's arguments in relation to combinations of the town with rural parishes. The inclusion of the area around The Weir which was accessed from West as detailed under the Rural response made more sense than the Commission's proposal, and the division should still be within acceptable electoral equality. Minor changes around the boundary with Broadway could resolve any minor concerns over equality.

**The Council therefore objects to the proposed division and recommends instead that the area around The Weir be included within the Division as detailed in the supplementary evidence pack. The Council supports the name [insert name here] for this division.**

### **Wylve Valley**

The Commission made major changes to the Council's proposals. The Council accepted that a wholly rural arrangement of parishes would make for a better governance and community proposal. While it was accepted that there are divisions with a comparable number of parishes, the Council believes that the Deverill Valley is itself a distinct geographic feature and that minor tracks between it and the western parishes is not high, certainly not as compared to the links of Corsley with the parishes to the south. For reasons of governance, community and electoral equality the Council therefore proposes that the division be accepted subject to the exclusion of Horningsham and Maiden Bradley with Yarnfield.

**The Council therefore objects to the proposed division and recommends that the parishes of Horningsham and Maiden Bradley with Yarnfield. The Council supports the name [insert name here] for this division.**

### **Westbury**

#### **Ethandune**

The Commission made major changes to the Council's proposals. This included dividing the town of Westbury to combine it with the rural parishes and the exclusion of Dilton Marsh.

This appears to have been suggested on the same basis as the Laverstock proposals which overemphasise the vitality of road links to the exclusion of any other factors of community, identity and governance, and suggests 'looking to' a nearby town, which all small parishes do, is itself proof no community connection is possible between outlying areas. Were this the case there would be no such thing as wider community as not all areas will be so connected. Nor is it a legal requirement given contiguity is the only requirement, which would have been maintained under the Council's proposals.

The Council continues to believe that the inclusion of areas of north Westbury, including substantial new housing development, is inconsistent with the approach taken around other large towns, it hinders effective governance and representation as the needs and interests of the rural area is very different to that of the town, including between Dilton Marsh and Westbury, and has only been suggested due to a lack of recognition that the rural parishes of the area all share interests and are better represented together even if road links are not ideal. The Council did however support the inclusion of Heywood in one division, as it had suggested.

**The Council therefore objects in the strongest possible terms to the Commission's proposals for this division, and restates its proposals as submitted on 5 November**

**2019 for the reasoning set out in the that submission, above and in the supplementary evidence pack. The Council supports the name [insert name here] for this division with the boundaries it proposed.**

### **Westbury East**

The Commission made major changes to the Council's proposals. This has been necessitated because of its decision relating to Dilton Marsh and has virtually no explanation for why the town has been divided in such a way, and even includes a Westbury North division which does not contain the northern part of Westbury.

The Council's proposal included the historic parts of Westbury following the area abutting Leighton.

**The Council therefore objects in the strongest possible terms to the Commission's proposals for this division, and restates its proposals for a Westbury East Division as submitted on 5 November 2019 for the reasoning set out in the that submission, above and in the supplementary evidence pack. The Council supports the name [insert name here] for this division with the boundaries it proposed.**

### **Westbury West**

The Commission made major changes to the Council's proposals. This has been necessitated as noted above because of its decision relating to Dilton Marsh. Leigh and Leigh Park, despite their names, have separate community centres, they should be contained in separate divisions as the Council originally proposed, as well as separating as much as possible the newer estates from the more historic areas of the town.

**The Council therefore objects in the strongest possible terms to the Commission's proposals for this division, and restates its proposals for a Westbury West Division as submitted on 5 November 2019 for the reasoning set out in the that submission, above and in the supplementary evidence pack. The Council supports the name [insert name here] for this division with the boundaries it proposed.**

### **Westbury North**

The Commission made major changes to the Council's proposals. This has been necessitated as noted above because of its decision relating to Dilton Marsh. The Council's proposal in contrast to the Commission's, actually includes the north of Westbury in its division, and in combination with the other response above the Council's proposals align better with the statutory criteria, given the Commission's reasoning for Dilton Marsh which necessitates the wholesale revision of the town is based on misconceptions of the nature of the community in the parishes.

**The Council therefore objects in the strongest possible terms to the Commission's proposals for this division, and restates its proposals for a Westbury North Division as submitted on 5 November 2019 for the reasoning set out in the that submission, above and in the supplementary evidence pack. The Council supports the name [insert name here] for this division with the boundaries it proposed.**