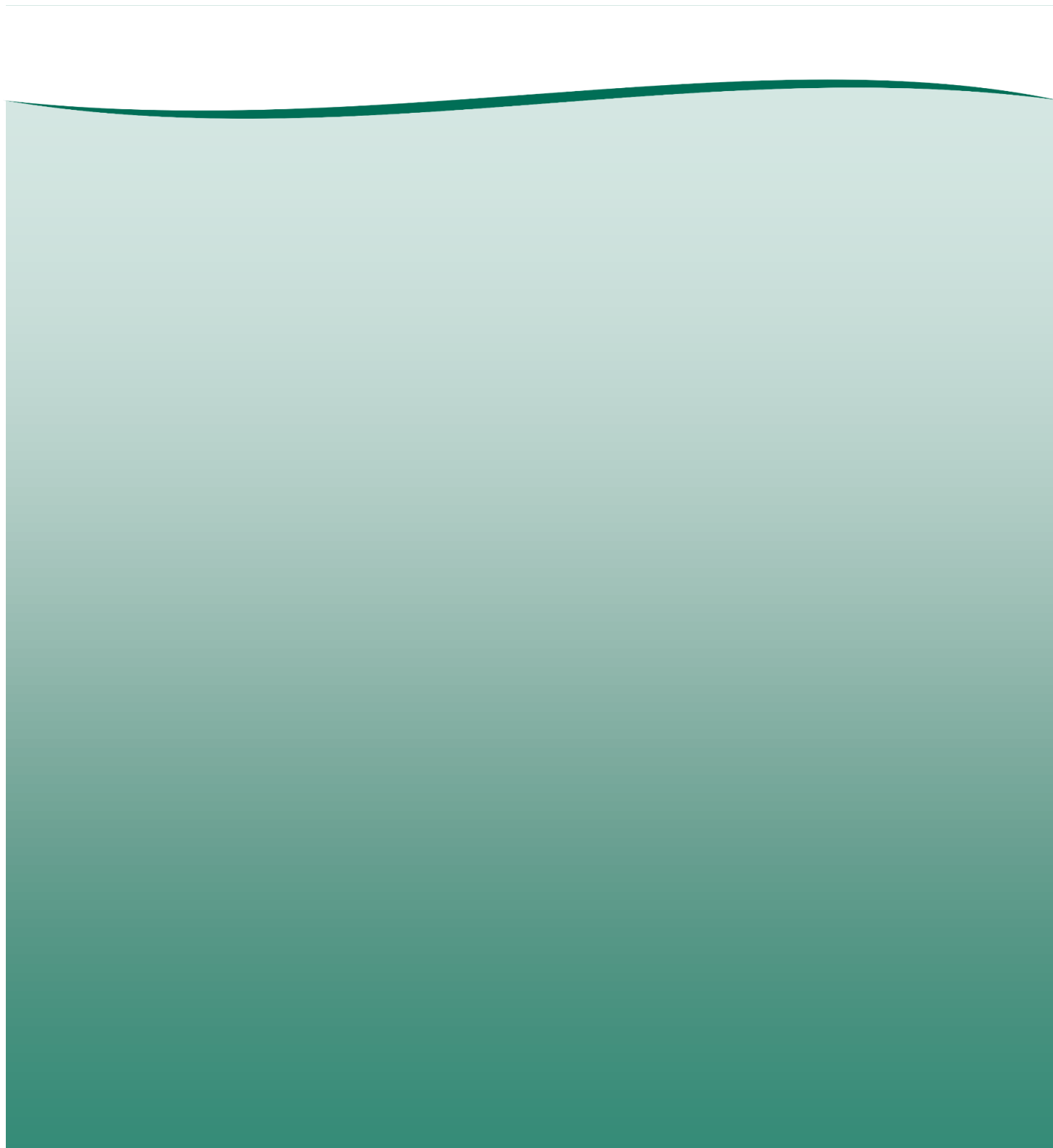


Electoral Review

**Wiltshire Council Response to the Further Limited
Consultation of the Local Government Boundary
Commission for England
July 2019**



Executive Summary

1. This document sets out the response of Wiltshire Council (“The Council”) to the revised draft recommendations of the Local Government Boundary Commission for England (“The Commission”) in its further limited consultation announced on 2 July 2019.
2. As a result of the limited timescale for a response, the Council at its meeting on 9 July 2019 delegated approval of a response to the Electoral Review Committee (“The Committee”), a politically balanced committee of the Council.
3. The response was prepared following consideration of the revised draft recommendations by the Committee and engagement with members of the Council. It was approved subject to any necessary consequential amendments at a meeting of the Committee on 23 July 2019.
4. In summary, the Council recognises the attempt by the Commission to resolve concerns expressed during the consultation on the initial draft recommendations and noted that some of the changes made did address those concerns. However, the Council considers that in so doing the revised proposals have, in some areas, resulted in greater harm to communities when considered within the context of the entire area affected. The Council therefore cannot support the revised draft recommendations as they stand, as it feels that that on balance other solutions address most of the concerns whilst causing less harm to other areas.
5. This submission should be read in conjunction with previous submissions.

Council Response

After much consideration the Council believes that, on the balance of evidence as weighed against the statutory criteria, it must object to the Commission's revised draft recommendations and restate its previous submission. In nearly all cases the changes proposed by the Commission across the entire area are the result of considering one statutory criteria, electoral equality, while only considering community identity impacts in one area.

Old Sarum & Lower Bourne Valley, and Laverstock

Objection: Electoral equality, effective and convenient local governance and community identity and cohesion

The Commission's initial draft recommendations in the Southern Wiltshire area were regarded by the Council as wholly unacceptable against the statutory criteria. Arbitrary division of Laverstock & Ford Parish into three divisions and combination with the City of Salisbury for two of those proposed divisions was seen as both unnecessary and with considerable negative impacts upon community interests and identity due to the strength of community identity in opposition to such a proposal.

The Council was pleased, therefore, that in response to the arguments presented and public representation the Commission has recognised that this element of its initial recommendations were not suitable. While the Council must still object to the totality of the proposed revised recommendations for reasons that will be set out in later paragraphs, it strongly reiterates that the distinctiveness of the local community in this area requires that Laverstock & Ford not be combined within divisions containing sections of the City of Salisbury.

The Commission's reasoning to join the northern sections of Laverstock & Ford parish with Winterbourne and parts of Idmiston are not persuasive. Paragraph 18 of the report does not explain why this is a suitable proposal on anything other than electoral equality grounds, while it is self-evidently not suitable on community identity and cohesion grounds as a result of the splitting of Idmiston parish. Whilst there must be a balancing of the various statutory criteria, no acknowledgement that the division does not adhere to two criteria is included to indicate such a balancing assessment took place.

Furthermore, the proposals in this area divides the most significant communities in the Bourne Valley of Idmiston and Winerboune. The Commission had accepted the argument that all the valley communities had a natural affinity, and it would seem because of mathematical concerns arising from Winterslow it has decided to split the most populous parts of the Bourne Valley.

These and other changes all stem from the decision to combine Winterslow and Firsdow parishes, yet no assessment is evident in the report as to why it is acceptable to not adhere to the statutory criteria with a negative effect on Idmiston in order to achieve that. There is no indication that any assessment as to the relative harm has been undertaken. The Council would argue that as the Commission's own guidance emphasises that as parishes should be used as building blocks wherever possible, the argument that one parish must be split to accommodate the wishes of another parish which was not going to be split, is not a strong one. The split of a parish community between divisions is almost by definition more significant than separate parishes being included in different divisions, even though it is acknowledged they do have close connections. Both the Council and the Commission have previously made every effort to avoid splitting parishes unless

absolutely necessary. The parish of Idmiston also strongly objects to this proposal. Unlike the objections in Firsdown, the proposals can be amended without significant impacts all across the southern parts of the council area.

In relation to the dividing line within Laverstock & Ford parish, Ford forms part of the historical core of the parish along with the village of Laverstock, and has been separated by these proposals. Whilst the proposal is an improvement on the initial draft recommendations, other solutions exist which are better able to protect the community identity.

In relation to the proposals for the rest of Laverstock & Ford parish, the Council accepts that the narrow land link to join the Bishopdown Farm areas of the parish with Laverstock village are acceptable on the same basis as the council's own arguments relating to the Longhedge and Bishopdown Farm connections, but would argue that its own submission ensures a more coherent boundary, without the significant knock on effects caused elsewhere by the Commission proposals which require the land link to be so limited.

An additional concern is the scale of the proposed divisions. Longhedge and Old Sarum is an area which has seen significant levels of new development and is likely to see more in future years. Unlike the Council's Winterslow proposals which had +11% variance in an area which is unlikely to see development growth and so would reduce in scale over time, the Commission's proposed division starts at +13% and is likely to grow larger still. It is therefore not a suitable exception to the general policy of not exceeding 10% variance. As the Council notes further in relation to the Winterslow proposals, it understands why the Commission has sought to make even further exceptions to the criteria in order to resolve the concerns it received, but such a large division in an area that will continue to grow is also not adhering to the criteria of effective and convenient local governance, as it is not a long-term solution for the area.

The Council would further note that the Commission received representations against dividing the Woodford Valley in its initial consultation and accepted this was reasonable in the circumstances, and the same reasons and representations were received in the draft recommendations consultation. The Council restates its proposals for this area, noting that nothing prevents the parishes in the area from continuing to work with one another, and that the division was proposed because it ensured acceptable electoral equality as to remove Durnford would result in a division of -11%, overly small for an area that is also unlikely to see development growth. Whilst the Council is well aware Area Board formation is its own decision the Commission have made their decision on 98 councillors in the context of the area board system (even though the exact formation of those boards is not their decision), and the Commission's proposals would make it quite likely the Woodford Valley communities would not be in a community relationship with the Bourne Valley communities, as is presently the case, whereas they would under the Council's proposals even though the Woodford Valley itself would be across two divisions, without a parish being split.

Winterslow and Upper Bourne Valley

Objection – Effective and convenient local governance, community identity and cohesion

The Council notes the considerable public representations that the Commission received from residents of Firsdow. These were predominantly focused on two points, namely a lack of desire to be included within a division which would necessarily have to be within Salisbury Area Board, and that owing to historical and other connections they wished to be included in a division with the parish of Winterslow.

The Council does not dispute either of these desires, however the size of the parishes in the area in both population and geography constrains available options for an overall pattern of divisions, as the Commission itself noted at paragraph 133 in its draft recommendations when permitting a division above 10% variance in this area, '*having regard to the boundaries of parishes in that part of Wiltshire*'.

It is understandable that the Commission has sought to address the many representations it received regarding Firsdow and Winterslow. As the Commission will see with responses from Idmiston in particular, however, no solution in this area will not cause considerable upset because even being more flexible with electoral equality the available options either combine areas with little connection or split parishes.

Therefore, the question is which solution has the most limited negative impact. The Council itself considered a great many potential division patterns across the Southern Wiltshire area, and although it would have been content to recommend the two parishes be combined in a division in isolation, the fundamental problem was that any attempt to do so, or indeed other solutions in the area, have wide ranging negative impacts upon several other areas.

This is clearly shown by the Commission's proposal as, with limited or even no explanation, the Commission has disregarded its own reasoned arguments for divisions stretching all the way to Warminster as a result of its attempt to 'resolve' the Firsdow and Winterslow conundrum. The Council strongly believes that while the initial draft recommendation proposal was certainly not regarded as ideal, any harm caused by the separation of Firsdow and Winterslow, which is not dismissed, is exceeded by the harm caused to other areas and the weakening of the overall pattern of divisions. It cannot be regarded as reasonable to disregard proposed divisions across such a wide-ranging area, which did not receive objection, to resolve a single issue, however important, if the harm to that area is mitigated or otherwise is exceeded in harm by the resulting changes.

There is a need to balance competing proposals which each have weaknesses. As the Commission have accepted that Laverstock & Ford should not be joined with the City of Salisbury, the Council would emphasise that while under the initial draft recommendations Firsdow would not be joined in a division with Winterslow, it would no longer be at risk of combination with the City as was also an expressed concern if the Commission accepted the Council's initial submission, and retained its own initial draft recommendation.

It is argued that whilst this is as noted not ideal for Firsdow, it ensures it will remain in close community connection with Winterslow through the Area Boards and has lesser cumulative harm than the changes across the Bourne Valley, Deverill Valley and South West Wiltshire combined. This is important context for considering any level of harm to Firsdow, given some degree of the concern at least was the Salisbury connection, which

is mitigated by the Council proposal even if it is not possible, without unacceptable wider impacts, to include it with Winterslow as they would prefer.

The proposals also ignore that Firsdow and Winterslow also have good connections with Pitton and Farley. Many of the public representations give reasons for Firsdow to also be included with Pitton in particular, which is in a joint parish council with Farley, evidencing strong community links between it and Winterslow. Whilst the Council reluctantly determined that the wishes of Firsdow could not be accommodated in combination either with either Pitton or Winterslow because of the vast impacts elsewhere, the Commission report makes no mention of Pitton when explaining its latest proposal, only when referring to previous proposals.

If the representations that convinced the Commission are to be logically followed, Pitton and Farley should have also been included with Winterslow, as the three were mentioned together on numerous occasions by respondents. No recognition is given to this in the Commission report in the relevant paragraphs 8-10, therefore it would appear the representations from the community have either been ignored, or dismissed without acknowledgement. The Commission appears to be stating that the connections of Firsdow with Winterslow are of relevance, but the connections of Pitton with Firsdow and Winterslow are not. If the Commission has considered these connections and not weighted them to be as significant, this should have been stated in the report. The Council notes that Pitton and Farley are included with Winterslow under its proposals, and those of the initial draft recommendations, without the additional harm the Commission's Firsdow proposals cause.

In relation to the Upper Bourne Valley part of the proposals, in addition to the unacceptable subdivision of Idmiston parish the Council notes the very tenuous connections between the area and Winterslow. Whilst the Council accepts and has proposed where necessary combinations of areas with limited road links, as has the Commission, where other suitable proposals exist it is a relevant consideration that the road link in question is not as significant as a map would lead the Commission to believe. It is a military road which approximately half the year is closed ([link to evidence of this](#)).

For all these reasons, the Council strongly objects to the revised Commission proposals.

Wylve Valley

Objection – Electoral equality

The Commission previously overruled the Council and insisted the Wylve and Steeple Langford fit most suitably with the Nadder Valley division. The public representations contained on the Commission website do not appear to include any suggestion that the two parishes should instead be included with the Wylve Valley division, contrary to as stated in the report. Instead, the reasoning for the change appears to again be a consequential change as a result of decisions elsewhere. The very fact that such major changes in so many areas are necessary because of a single decision is an indication that the balance of the arguments suggests such a change should not be made.

Whilst the division would share character as a rural area, the Council objects on the grounds of electoral equality. -11% in an area unlikely to see much development is not a suitable proposal for the longer term as an exception to the criteria, not is such an exception necessary. The Wylve Valley also extends into the top part of the Deverills, and those three parishes are inextricably linked, two in a joint parish council. This would ensure a division of more than reasonable variance which share character as the rural

hinterland of Warminster and along the A36 towards Wilton.

The Council would therefore restate its previous proposal. It has superior electoral equality, does not combine the Deverill Valley with parishes to which it has no community connection to the south, and results in a more balanced division in Warminster North and Rural, rather than one dominated by its urban aspects to the detriment of the rural communities within it. As with proposals around Southwick, the Commission has accepted preserving rural community as a relevant factor in creating a division, and where a combination of rural and urban is unavoidable due to numbers, as with Warminster, an even combination is less harmful to rural community.

Upper Nadder and the Deverills

Objection – Community identity and cohesion and effective and convenient local governance.

The only statement in the report made in support of this radically different proposed division is that the parishes are of similar size. As the report states on several occasions the Commission suggests it 'must' revise its own proposals, as if this mathematical necessity as a result of other decisions removes any requirement to consider if the proposed areas have any sort of alignment of community or identity. This complete lack of consideration of the statutory criteria has not led to an acceptable proposal.

The Nadder Valley communities have, with no explanation as to why the Commission's own previous reasoning as to the community has been disregarded, been divided with the Chalke Valley area. The proposals ignore the sizable hill and geographic separation between the Deverills and the communities to the south, it ignores the east-west rather than north-south nature of the valleys in southern Wiltshire past the Deverills, it dismisses the strongly made representations that West Knoyle is closely aligned with Mere, it ignores that Horningsham has marginal connections with the Deverills which itself has little commonality with the rest of the division which is centred on the communities running south to Dorset or along the A303 leading to the east.

If it is felt that changes in other areas require the change and this proposal causes less harm the Council strongly disagrees, but that argument is not being made publicly in the Commission report so that they can be assessed and responded to it is hard to see how the Commission's proposals justify themselves on anything other than the grounds of electoral equality, as no community or governance reasoning is supplied. All divisions should wherever possible align to all three statutory criteria, and if this is not possible an explanation should be provided as to why one should overcome the others.

Therefore, given the lack of reasoning for the Commission's proposals and given the unacceptable community impacts in particular upon the Deverill valley area and West Knoyle, the Council objects to the proposals.

Tisbury and Mere

Objection – Community identity and cohesion, effective and convenient local governance

As acknowledged in the Commission report changes in Mere are the result of consequential changes made to other divisions. Mere and West Knoyle both strongly object to the separation of these two parishes into separate divisions. Whilst this might be claimed to be analogous to the Winterslow and Firsdown situation, the difference is that Mere and West Knoyle being included together does not have widespread affects across

a vast portion of Southern Wiltshire which requires the Commission to disregard its own reasoning without any objections across the area demanding this. The two parishes are also very closely aligned geographically and in local governance terms.

The Tisbury changes have been given no explanation at all other than the Commission 'must' revise its proposals. The Council cannot support a proposal which has no reasoning other than electoral equality. Given the need to consider all statutory criteria, even a slight community argument, for instance including Mere with West Knoyle, is of greater weight than no argument at all.

Alderbury and Whiteparish and Downton and Ebbles Valley

Objection – Effective and convenient local governance

These proposed divisions are the same or close to the same as their present boundaries. The Council acknowledges they are therefore acceptable on community grounds and indeed preferred by some of the parishes. However, as detailed at length above the wider impacts of such proposals are unacceptable when considered overall against the criteria of effective and convenient local governance. The proposals force the situation to the north that requires the splitting of a parish and the arbitrary inclusion of parishes to the west around Warminster.

Chalke Valley

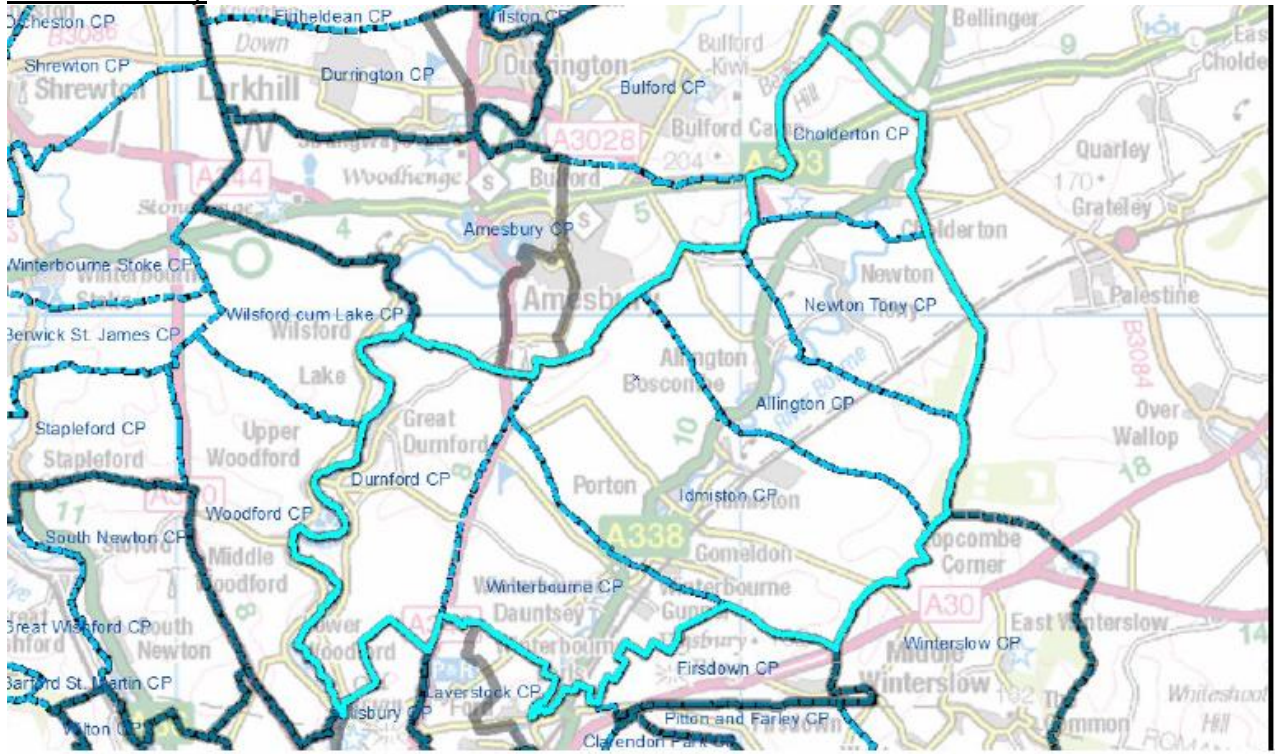
Objection – Effective and convenient local governance

The Council acknowledges that a division comprised of two sections of communities north and south is not as unreasonable as some of the other proposals in the Commission's revised draft recommendations. However, there is no need to divide up the Nadder Valley in such a way and doing so causes unacceptable harm south of Warminster by requiring the Deverill Valley be joined to the communities of Nadder.

The Council restates its previous proposal, inclusive of Netherhampton parish being divided between Salisbury Harnham West and Wilton. That proposal accepted the reasoning of the Commission itself to include Coombe Bissett and Odstock, and excluding areas such as Compton Chamberlayne. Whilst not regarded as ideal by some of the parishes there is limited harm as a result, contrasted with the extreme proposals put forth by the Commission which disregard to no good purpose the statutory criteria for the sake of a single parish which will not be unduly harmed under other proposals.

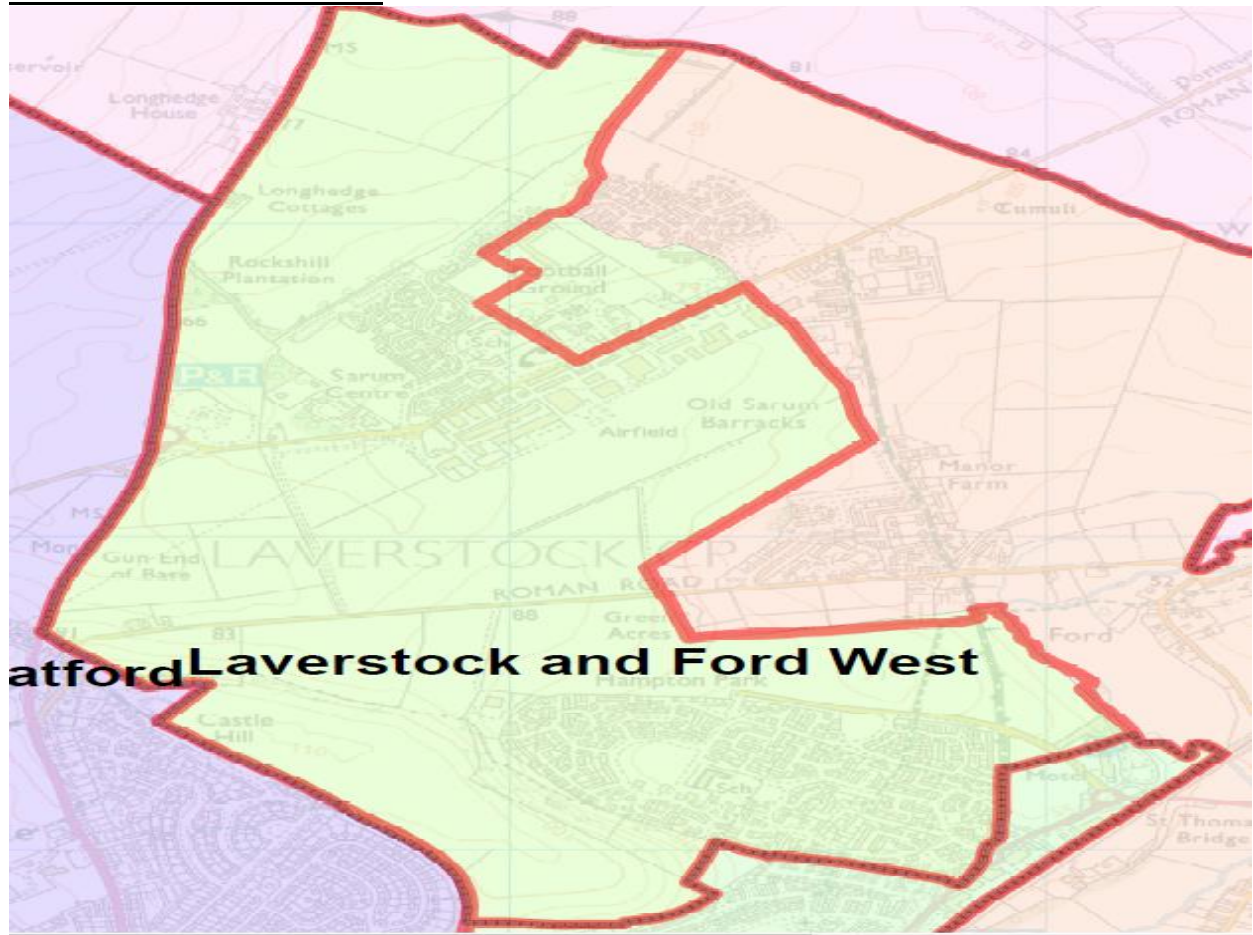
Numbers and Maps

Bourne Valley



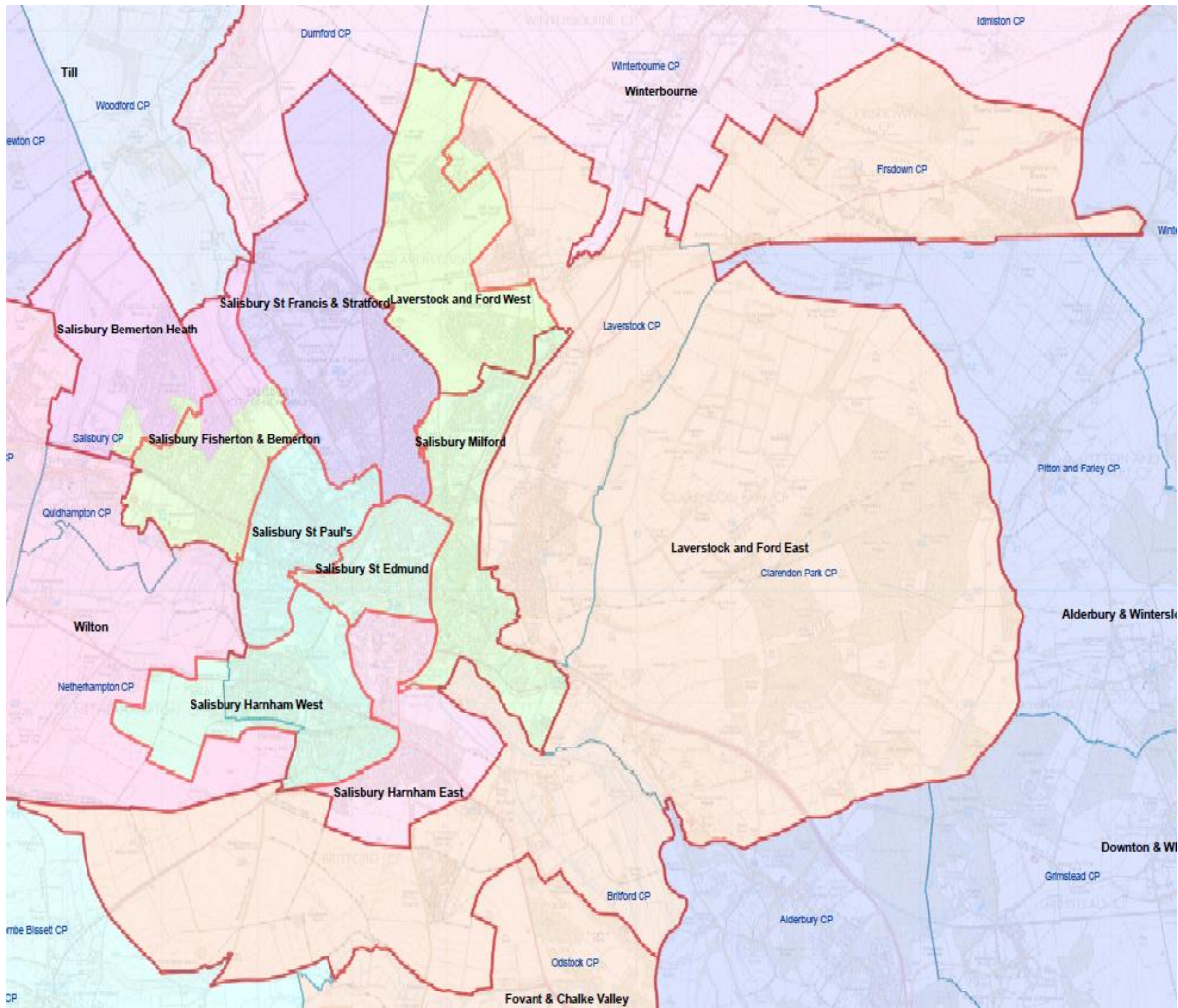
Polling district	Parish	Old Division	Electorate 2024
AU	Durnford	Bourne and Woodford Valley	286
BC	Idmiston	Bourne and Woodford Valley	629
BD	Idmiston	Bourne and Woodford Valley	272
BE	Idmiston	Bourne and Woodford Valley	873
DJ	Winterbourne	Bourne and Woodford Valley	1040
AC	Allington	Bulford Allington and Figheldean	460
AO	Cholderton	Bulford Allington and Figheldean	186
BJ	Newton Tony	Bulford Allington and Figheldean	328
Forecast Electorate in 2024		4074	Variance -4%

Laverstock and Ford West



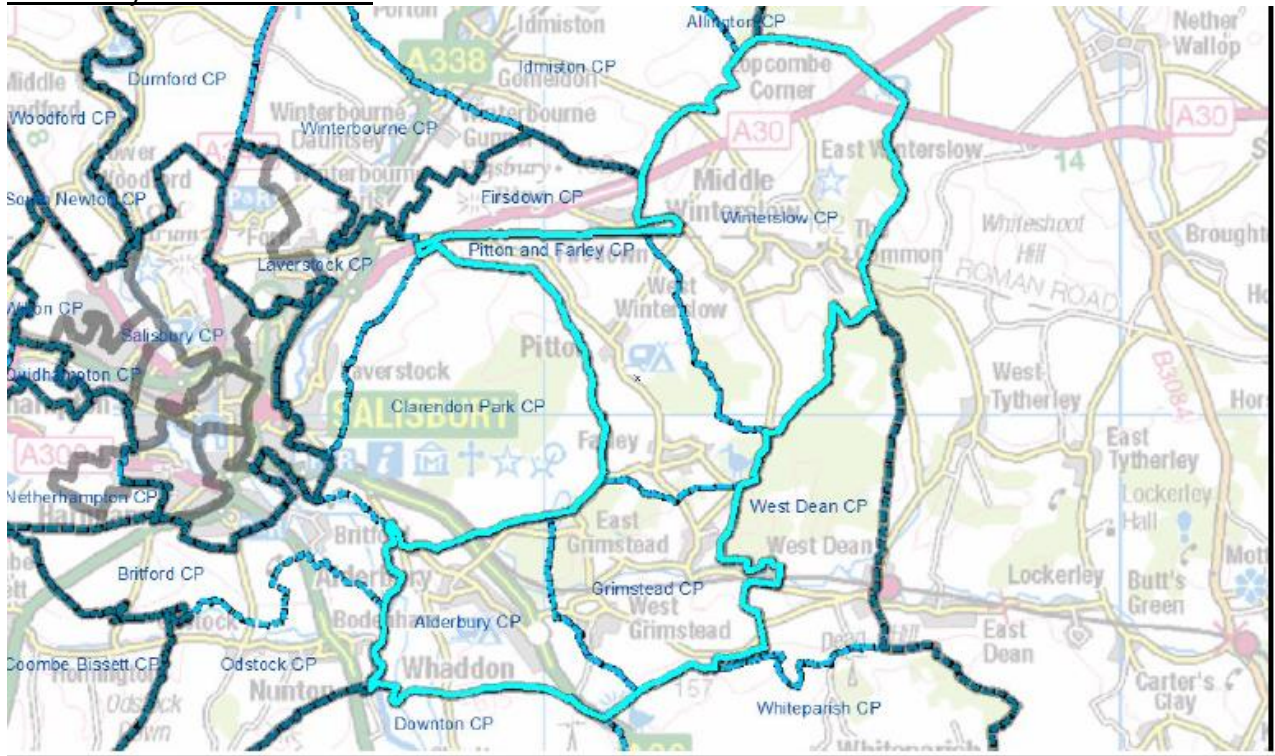
Polling district	Parish	Parish ward	Proposed Division	Electorate 2024
BS1	Laverstock & Ford	Bishopdown Farm	Laverstock and Ford West	1862
BS2	Laverstock & Ford	Bishopdown Farm	Laverstock and Ford West	632
BS3	Laverstock & Ford	Bishopdown Farm	Laverstock and Ford West	0
BG2 (part)	Laverstock & Ford	Ford, Old Sarum and Longhedge	Laverstock and Ford West	1816
			Total	4310 +1%

Laverstock and Ford East



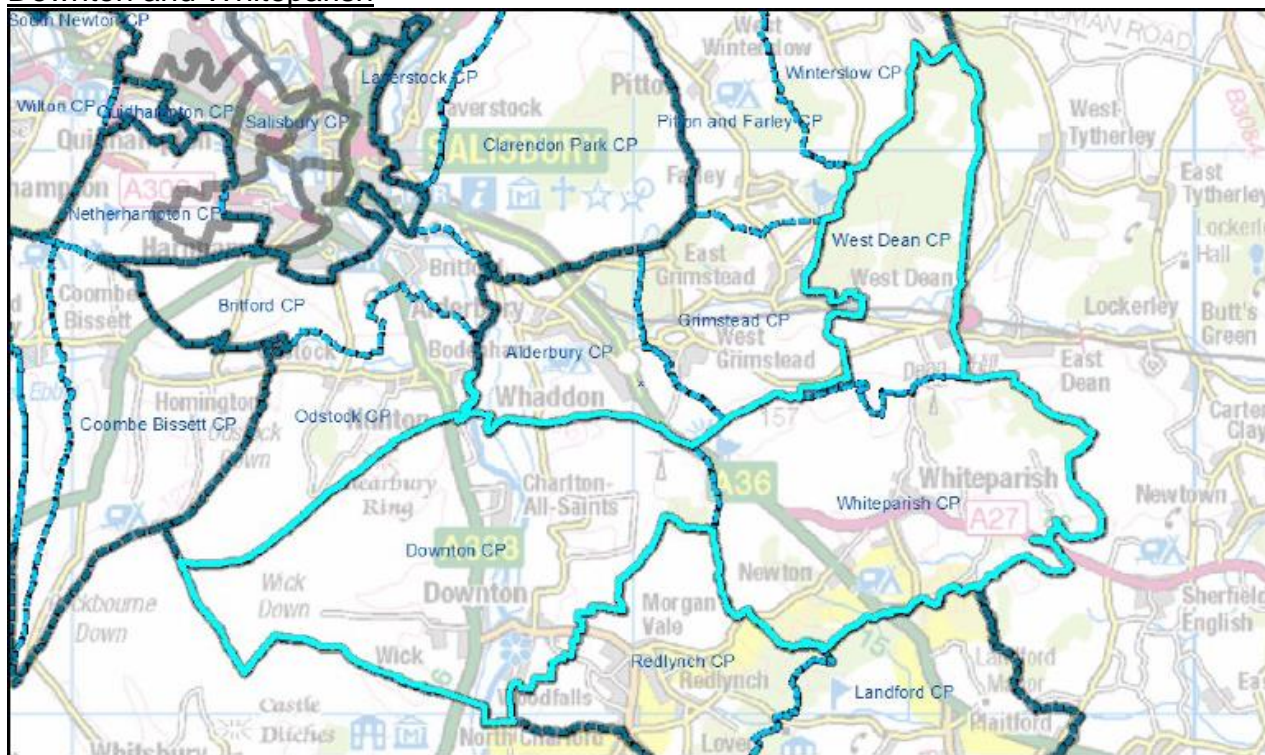
Polling district	Parish	Parish ward	Proposed Division	Electorate 2024
AJ	Britford		Laverstock and Ford East	300
DT	Clarendon Park		Laverstock and Ford East	210
DK	Firsdown		Laverstock and Ford East	508
BG1	Laverstock & Ford	Laverstock and Milford	Laverstock and Ford East	2164
BG2 (part)	Laverstock & Ford	Ford, Old Sarum and Longhedge	Laverstock and Ford East	1320
			Total	4502 +6%

Alderbury and Winterslow



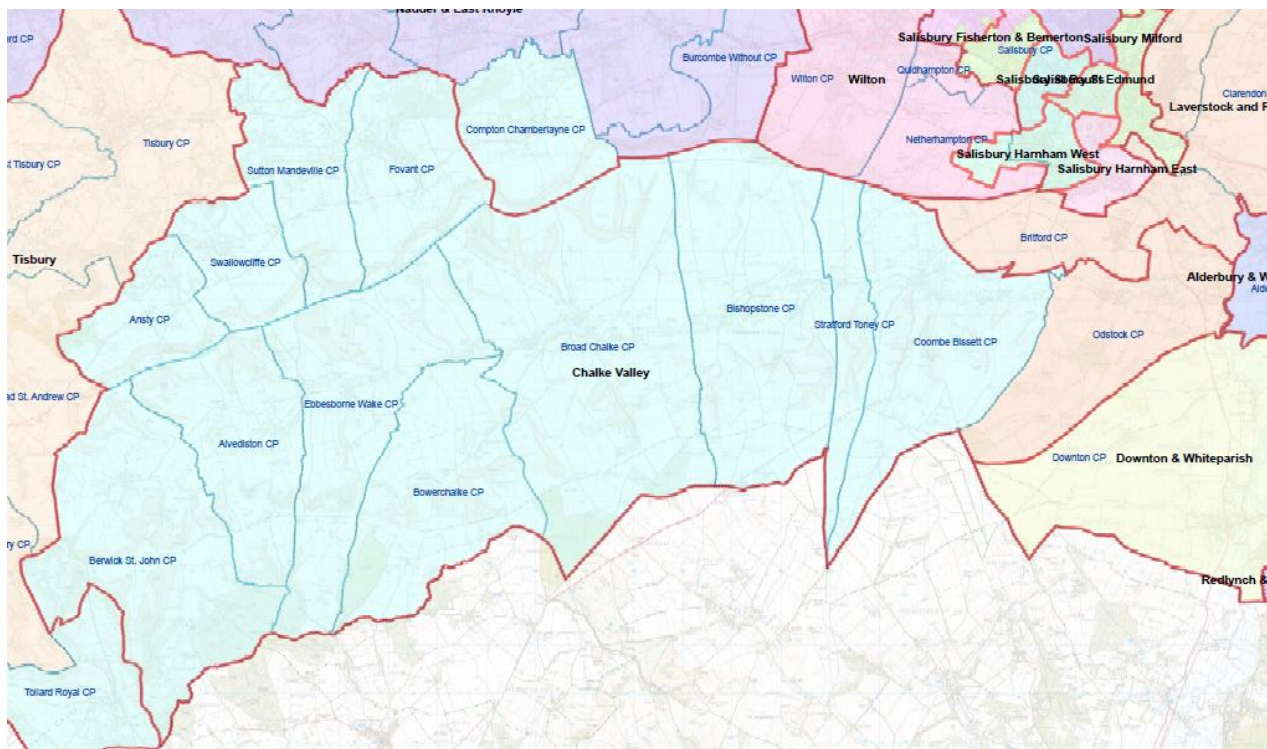
Polling district	Parish	Old Division	Electorate 2024
AA	Alderbury	Alderbury and Whiteparish	713
AB	Alderbury	Alderbury and Whiteparish	1138
BB1	Grimstead	Alderbury and Whiteparish	151
BB2	Grimstead	Alderbury and Whiteparish	326
BM1	Pitton & Farley	Winterslow	277
BM2	Pitton & Farley	Winterslow	380
DM1	Winterslow	Winterslow	701
DM2	Winterslow	Winterslow	1051
Forecast Electorate in 2024		4737	Variance +11%

Downton and Whiteparish



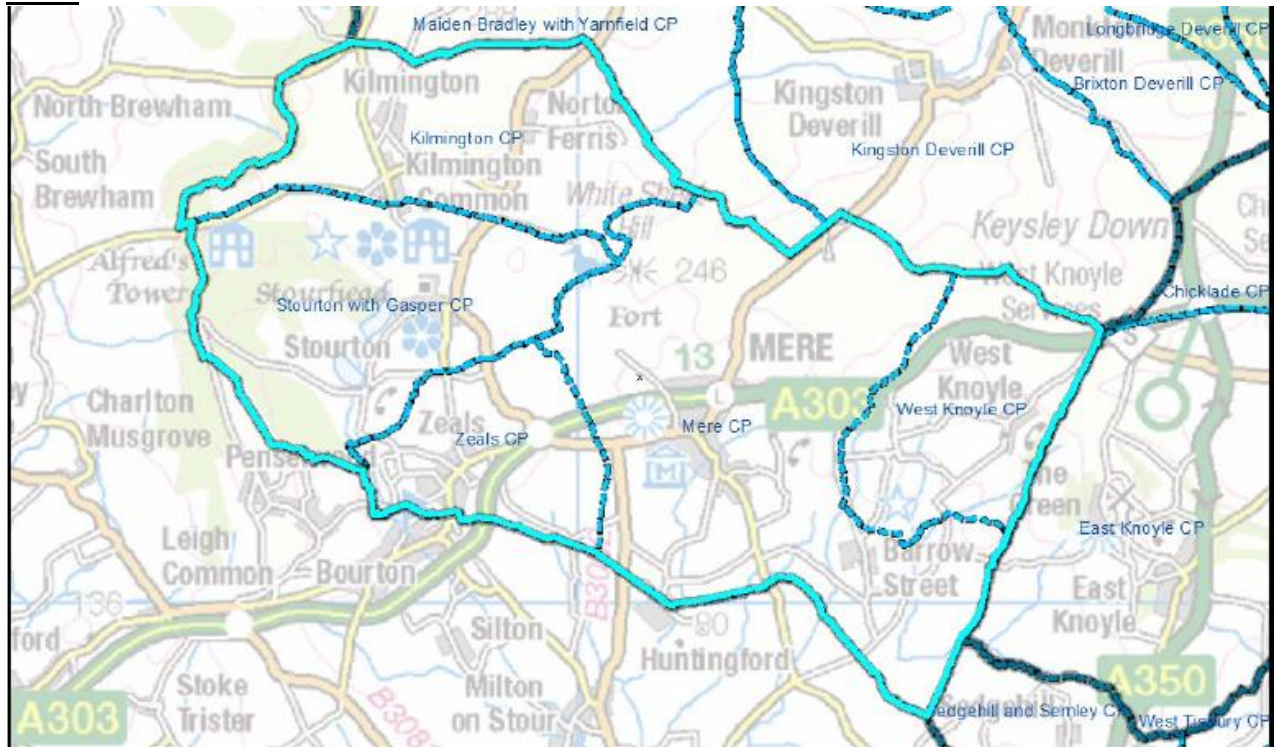
Polling district	Parish	Old Division	Electorate 2024
DG1	Whiteparish	Alderbury and Whiteparish	1232
DG2	Whiteparish	Alderbury and Whiteparish	34
AS	Downton	Downton and Ebble Valley	2630
AT	Downton	Downton and Ebble Valley	165
DF	West Dean	Winterslow	204
Forecast Electorate in 2024		4266	Variance 0%

Fovant and Chalke Valley



Polling district	Parish	Proposed Division	Electorate 2024
AH	Bishopstone	Fovant and Chalke Valley	541
AI	Bowerchalke	Fovant and Chalke Valley	342
AK	Broadchalke	Fovant and Chalke Valley	556
AQ	Coombe Bissett	Fovant and Chalke Valley	600
AX	Ebbesbourne Wake	Fovant and Chalke Valley	189
AZ	Fovant	Fovant and Chalke Valley	567
BK	Odstock	Fovant and Chalke Valley	457
DS	Stratford Tony	Fovant and Chalke Valley	56
EA	Alvediston	Fovant and Chalke Valley	82
EB	Ansty	Fovant and Chalke Valley	112
ED	Berwick St John	Fovant and Chalke Valley	224
GN	Sutton Mandeville	Fovant and Chalke Valley	216
GP	Swallowcliffe	Fovant and Chalke Valley	166
		Total	4108 -4%

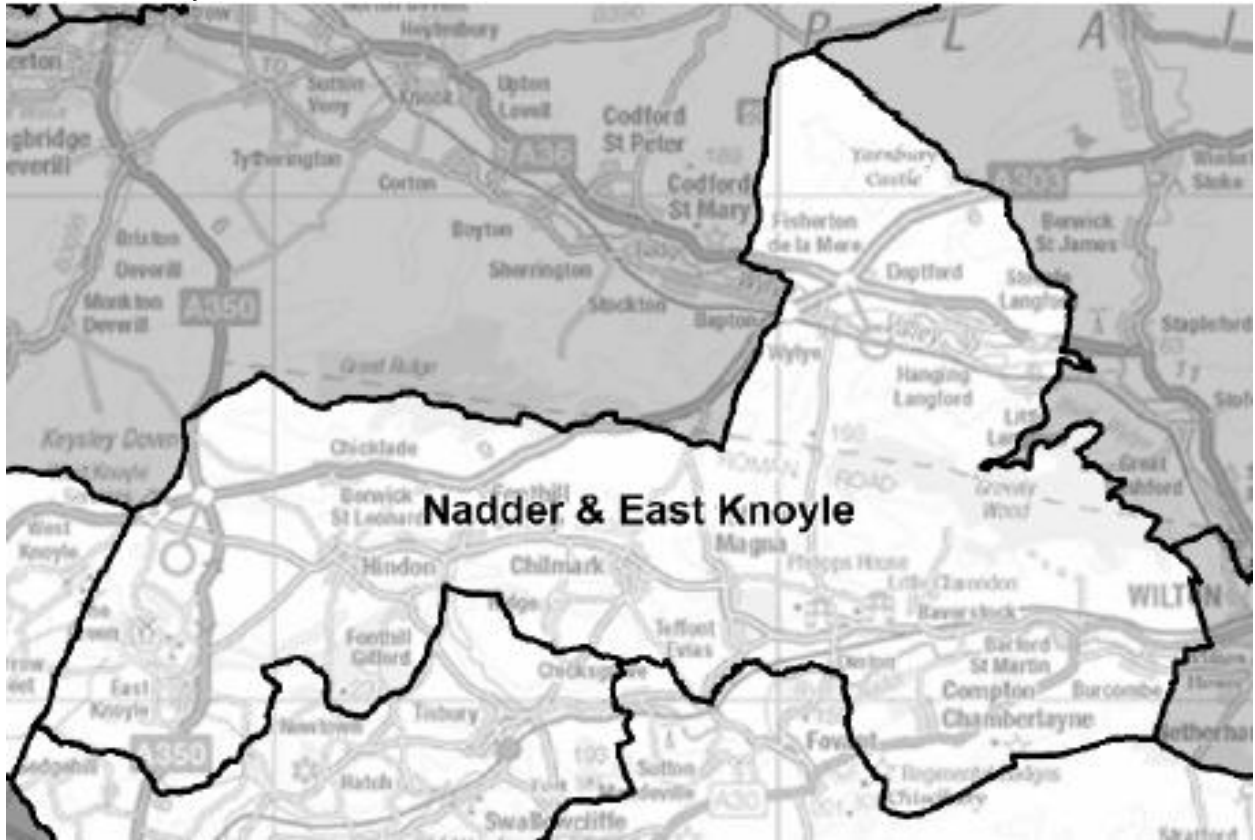
Mere



Polling district	Parish	Old Division	Electorate 2024
FI	Kilmington	Mere	233
GA	Mere	Mere	2743
GM	Stourton	Mere	174
IN	West Knoyle	Mere	140
IS	Zeals	Mere	585
Forecast Electorate in 2024		3876	Variance -9%

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Nadder Valley



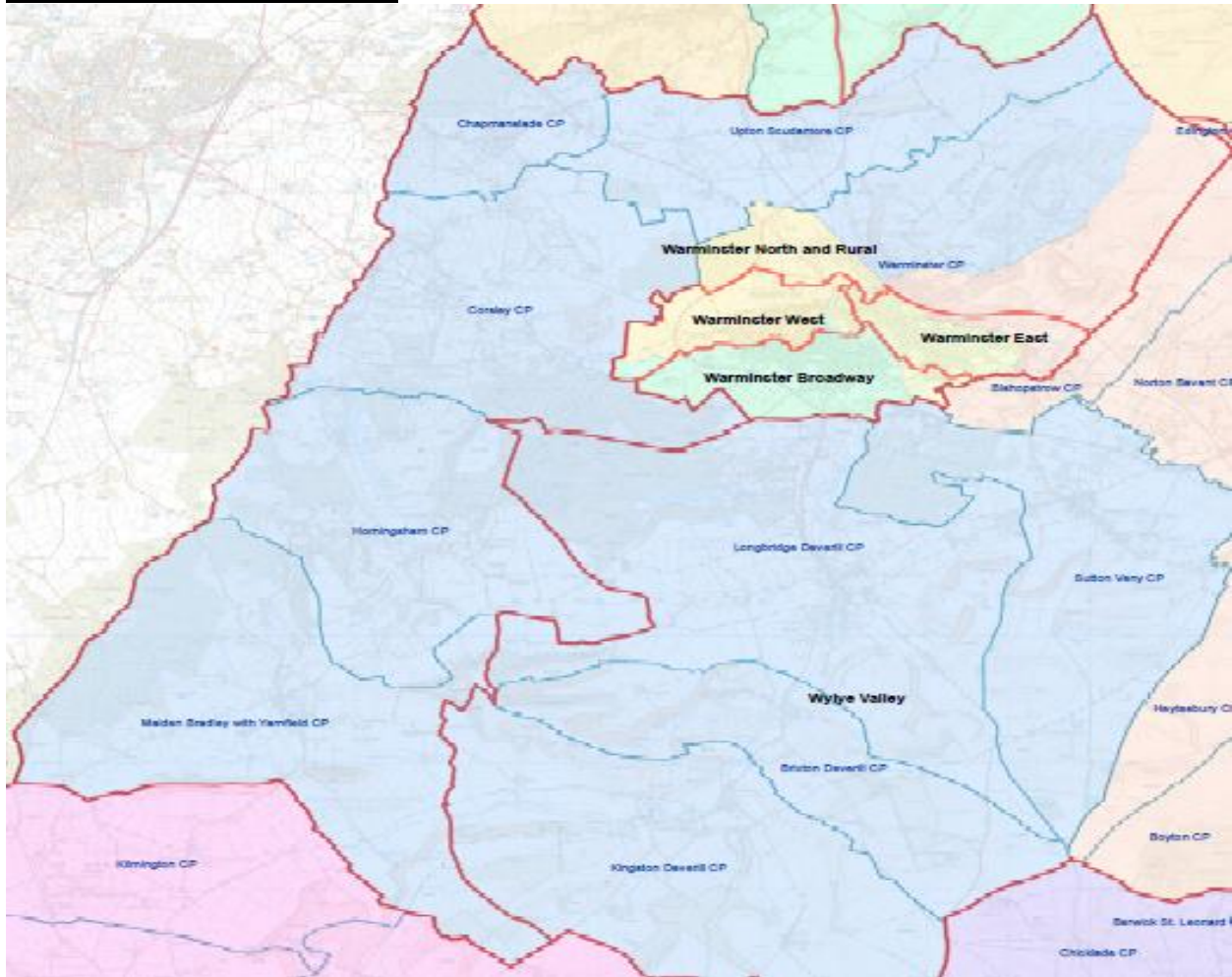
Numbers as per Commission proposal, but to be named Nadder Valley.

Tisbury



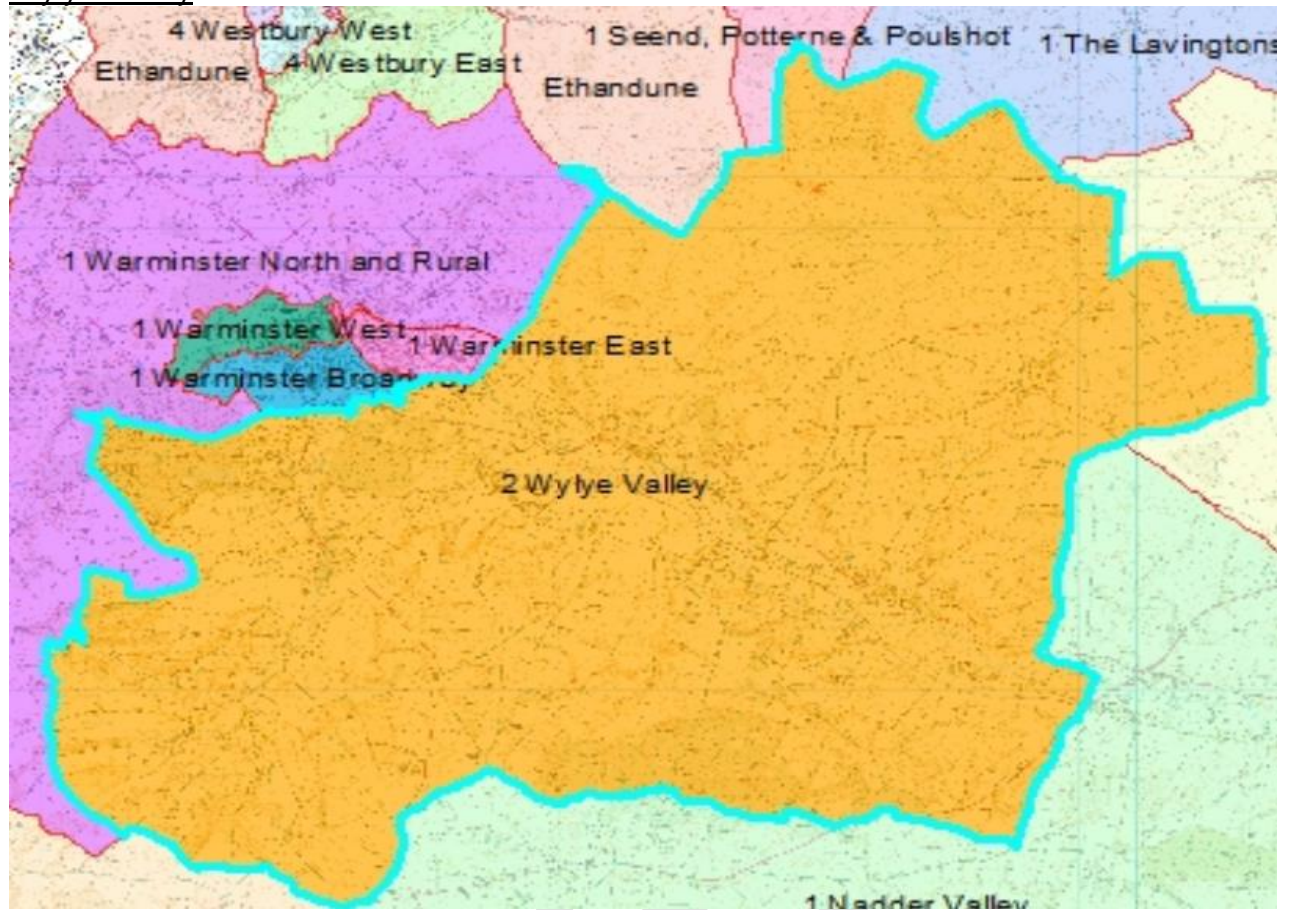
Numbers as per Commission initial draft recommendations.

Warminster North and Rural



Polling district	Parish	Parish ward	Proposed Division	Electorate 2024
EN1	Chapmanslade		Warminster North and Rural	624
ER1	Corsley		Warminster North and Rural	589
IC1	Warminster	Warminster Copheap Ward	Warminster North and Rural	1312
ID1 (Part)	Warminster	Warminster West Ward	Warminster North and Rural	854
IE2 (part)	Warminster	Warminster East Ward	Warminster North and Rural	170
IG1	Upton Scudamore		Warminster North and Rural	266
FM	Maiden Bradley with Yarnfield		Warminster North and Rural	290
DS	Horningsham		Warminster North and Rural	255
			Total	4360 +2%

Wylve Valley



Polling district	Parish	Parish ward	Proposed Division	Electorate 2024
EE6	Bishopstrow		Wylve Valley	112
EE7	Bishopstrow		Wylve Valley	5
EE8	Bishopstrow		Wylve Valley	8
EF6	Boyton		Wylve Valley	148
EP1	Chitterne	Chitterne All Saints Ward	Wylve Valley	181
EP7	Chitterne	Chitterne St Mary Ward	Wylve Valley	70
EQ1	Codford		Wylve Valley	716
EQ7	Sherrington		Wylve Valley	45
FA1	Heytesbury		Wylve Valley	635
FA7	Knook		Wylve Valley	71
FJ6	Kingston Deverill		Wylve Valley	235
FJ7	Brixton Deverill		Wylve Valley	73
FL1	Longbridge Deverill		Wylve Valley	726
GD6	Norton Bavant		Wylve Valley	106
GL6	Stockton		Wylve Valley	147
GO1	Sutton Veny		Wylve Valley	596
IA6	Upton Lovell		Wylve Valley	135
			Total	4009 -6%