

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, whilst happy to accept many of them, a number remained which it felt 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, an inconsistent approach has 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 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 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 demonstrably incorrect to imply, therefore, that administrative concerns regarding area board arrangements were given prominence over the statutory criteria. 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. Even starting with a blank canvass, given the logic of the commission recognizing 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's proposals are therefore in line with the statutory criteria.
7. 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. 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, 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.

8. A division proposal which relies solely on physical proximity is therefore flawed if alternate proposals highlight genuine shared interests and character, 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 recognized 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.
9. The Council highlights the Commission's proposals in Melksham, Westbury and Laverstock as well as other individual changes in Malmesbury and Chippenham for examples of changes made focused overwhelmingly and unnecessarily on electoral equality or a misapplication of the principle of community identity which posits 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 purportedly divided a community within the parish.
10. 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 XX of 98 divisions. Where the proposals of the Council were accepted in the Draft Recommendations, this submission should be read in conjunction with the reasoning and evidence set out in the submission of 5 November 2018.
11. The Council also reiterates in the strongest possible terms that all proposed divisions should remain, as proposed, single member divisions. Multi-member divisions do not prove 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.
12. 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.
13. 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 to the Commission's proposals detailed in the submission, should be considered against those minor corrections/clarifications.

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.

Hyperlinks to divisions proposals

- 1
- 2
- 3
- 4
- 5
- 6
- etc

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. The proposal also allows for the rest of Amesbury to be divided along appropriate community lines.

The Council therefore makes no objection to 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 makes no objection to 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. **(There are concerns on the numbers in a section around Amesbury, which the Commission reference in their report. This is being checked as this would impact whether the Council objects to the new line)**

The Council therefore makes no objection/objects to 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 makes no objection to 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 makes no objection to 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 makes no objection to 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 makes no objection to this proposed division. The Council supports the name [insert name here] for this division.

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 makes no objection to 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 makes no objection to 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 makes no objection to 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 makes no objection to this proposed division. The Council supports the name [insert name here] for this division.

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 makes no objection to 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, while incoming new development which, importantly, do not have any established community with the rest of the parish, will be combined within an urban division with whom they will share types of concern. However, the line 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.

The Council therefore objects to this proposed division, and requests the section of Langley Burrell Without to be included 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.

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 makes no objection to this proposed division. The Council supports the name [insert name here] for this division.

Calne Chilvester and Abbett

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 makes no objection to 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 makes no objection to 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 makes no objection to 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 makes no objection to this proposed division. 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 makes no objection to 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 makes no objection to 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 makes no objection to 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 makes no objection to 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 entirely 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 enable an entirely urban division is created 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 fails to meet all three statutory criteria. The Council did not have objections to the other minor changes proposed.

The Council therefore strongly 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 makes no objection to 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 with Hardens and Central was not felt to be significant.

The Council therefore makes no objection to 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 makes no objection to this proposed division. The Council supports the name [insert name here] for this division.

Box

The Commission accepted the Council's proposals for Box with very variation which had no impact on issues of community and governance, and seemed in relation to a more pleasing 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 makes no objection to this proposed division. The Council supports the name [insert name here] for this division.

Corsham Pickwick

The Commission made a large series of 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 makes no objection to 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 makes no objection to 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 submissions.

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 makes no objection to 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 makes no objection to 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. (There are some concerns over numbers in the North proposal, which will not see further development, and therefore impacts on whether to object to east)

The Council therefore makes no objection/objects to 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 suggested were in line with all three statutory criteria. (There are some concerns over numbers in the North proposal, which will not see further development)

The Council therefore makes no objection/objects to 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 makes no objection to 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 makes no objection to 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 continues to be considered that the proposal represents an effective community and governance proposal.

The Council therefore makes no objection to this proposed division. The Council supports the name [insert name here] for this division.

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 makes no objection to 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 makes no objection to 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 is very contrary to the other statutory criteria of the review. The proposals allege 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. Bluntly, this analysis defies logic. The community and governance impact from dividing very new or still to be built estates 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. Given the better road links and nature of the new communities that were proposed 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 entirely fail on

both community cohesion and governance grounds. The Council has considered the reasoning provided by the Commission and made some adjustments to its original proposal to alleviate the concerns the Commission felt.

Insert paragraph on the new proposal explaining why it meets criteria

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 division would be superior in both community and governance terms, especially when nowhere else in the Council 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 very strongly 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 very strongly 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 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 makes no objection to 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 makes no objection to 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 makes no objection to this proposed division. The Council supports the name [insert name here] for this division.

Melksham Berryfield and Rural

The Council's proposals for this area were accepted without variation. It is worth nothing, 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 makes no objection to 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 it would seem attempts to create a slightly more urbanised division than that proposed by the Council, which is not in itself unacceptable given the community of Bowerhill is quite sizable near the edges of the town of Melksham. 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. 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. 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 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 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 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 to 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 xxxxxxxx was an acceptable proposal by the Commission.

The Council therefore 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 xxxxxxx. 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 possibly 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 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 therefore 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 xxxxx which it is accepted align well with the statutory criteria.

The Council therefore 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 xxxxxxx. The Council supports the name [insert name here] for the division with the boundaries as suggested.

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 makes no objection to 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 makes no objection to 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 makes no objection to this proposed division. The Council supports the name [insert name here] for this division.

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 makes no objection to 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 makes no objection to 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 makes no objection to 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 makes no objection to 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 subdivision into three raised no objections as it replicated the existing arrangement with minor modification.

The Council therefore makes no objection to 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 amended name was not objected to, though it was noted that many divisions in Wiltshire including from the Commission proposed names with cardinal directions that were less than literal.

The Council therefore makes no objection to this proposed division. The Council supports the name [insert name here] for this division.

Salisbury Bemerton Heath

The Commission broadly accepted the proposals of the Council with some minor variations. The Council accepted that a clear subdivision 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 makes no objection to 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 makes no objection to 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 subdivision of the wider Harnham area, which is necessary as a result of electoral equality.

The Council therefore makes no objection to 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 makes no objection to 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 makes no objection to 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 makes no objection to 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. Regrettably, the Commission's proposals are wholly unacceptable when judged against the statutory criteria of community cohesion and effective and convenient local government, are logically 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 subdividing the Old Sarum area, which is a section of the parish of Laverstock and Ford. In order to avoid subdividing the Old Sarum area, the Commission propose instead to subdivide *both* the Bishopdown area of the parish and the Laverstock village part of the parish. No reasoning is provided as to why it is unacceptable to subdivide Old Sarum but acceptable to sub-divide 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 that both parts are included in divisions containing mostly the same parish,

is far more logically coherent on a community basis than subdividing the far more established communities of Bishopdown 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 and Ford parish in which xx% 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 subdividing 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 Laverstock and the city in the Milford division. If it is considered that a massive, 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 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 categorization 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 shame community identity even with limited road links.

The proposals are therefore wildly 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 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 and 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 and Ford parish.

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 subdivision of one part of Laverstock and Ford parish by subdividing 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 and Ford must be subdivided into three constituent parts, each with an established community. This is clearly logically absurd, and 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 t 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 brief 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 massive 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 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 illogical and inconsistent, and wholly incompatible with the statutory criteria of the review. The Council's proposal, by contrast, retains the historic core of Laverstock and Ford parish, combined with parishes that all 'look to' the city, as all parishes in the area do, but which share their unhappiness 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, and restates its proposals as submitted on 5 November 2019 for a Laverstock, Firsdown, 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 yyyyy. 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 set out 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 further sections of Bishopdown Farm into Laverstock and 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, and that parishes should where possible be used as building blocks, resulting in a division unnecessarily splitting a parish seemingly 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 makes no objection to 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 is 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 makes no objection to 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 makes no objection to this proposed division. The Council supports the name [insert name here] for this division.

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 Knoye

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 Wylve 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 makes no objection to 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 size of the parish

made inclusion of other parishes impossible and the two 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 a greater community connection with Wilton.

The Council therefore makes objects to this proposed division and requests that the section of Netherhampton parish not include 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 makes no objection to 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 link better to Tisbury and there are no opposing reasons why the parish should remain in the Fovant division, subject to any electoral equality requirements.

The Council therefore makes no objection to this proposed division. The Council supports the name [insert name here] for this division.

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 makes no objection to 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 makes no objection to 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 makes no objection to this proposed division. The Council supports the name [insert name here] for this division.

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 makes no objection to 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 makes no objection to 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 makes no objection to this proposed division. The Council supports the name [insert name here] for this division.

Trowbridge Lambrook

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 makes no objection to 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 makes no objection to 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. **(There are considerations that the line should go around the back of houses rather than down the Woodmarsh and Westbury Road)**

The Council therefore makes no objection/objects to this proposed division. 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 accepts the arguments of the Commission. The reasoning to include areas of urban expansion in order to preserve the rurality of the parishes in the wider area continues to apply. **(There are considerations that the line should go around the back of houses rather than down the Woodmarsh and Westbury Road)**

The Council therefore makes no objection/objects to this proposed division. 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 makes no objection to 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 makes no objection to this proposed division. The Council supports the name [insert name here] for this division.

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 makes no objection to 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 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 that the area around The Weir be included 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. 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.

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 contiguosness 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.

Insert section on what is wrong with commission's proposal and why council's better here

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.

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.

Insert further section on what is wrong with commission's proposal and why council's better here

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.

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.

Insert further section on what is wrong with commission's proposal and why council's better here

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.