

Response of Melksham Without Parish Council to Wiltshire Council on Community Governance Review – 12th October 2015

Comments against the "Guidance on community governance reviews" by the Local Government Boundary Commission for England of which "Principal Authorities are required, by section 100 (4) of The Local Government and Public Involvement in Health Act 2007, to have regard to this guidance which is issued by the Secretary of State, under section 100 (1) and (3), and the LGBCE under under section 100 (2).

3. From 13 February 2008 Unitary county councils Have had responsibility for undertaking community governance reviews and have been able to decide whether to give effect to recommendations made in those reviews. In making that decision, they will need to take account of the views of local people.

The Parish Council query how Wiltshire Council are seeking the views of local people if they are not contacting them directly by letter, as they are doing in other areas of Wiltshire under review? The Parish Council understand that the cost of writing to all residents of Melksham and Melksham Without was cited as the reason for not writing a letter to each household; but the Parish Council query this as a legitimate reason for not writing. In addition the population against both parishes is circa 20,000 which gives a cost of postage of £10,800 for sending 2nd class plus an element for stationery (even lower for franked mail or via a specialist company); and therefore question the quoted figure of £20,000 that was given at the Wiltshire Full Council meeting.

By distributing a leaflet to residents via the Melksham Independent News that is delivered the day after the two public meetings is not effectively seeking views. Wiltshire Council could have found out when the deadline and issue dates for the newspaper was, and set the meetings accordingly. At present public meetings in Melksham and Melksham Without are for Tues 20th October and Weds 21st October with the newspaper issue dated Weds 21st October of which most homes receive a delivery on Thursday 22nd October and some over the following days. The Parish Council therefore request that these meetings are put back by a fortnight to the beginning of November. (NB: The Council have been notified on 15/10/15 that an additional meeting will be held on Weds 4th November, again in the Town and not in the villages of Melksham Without but the meetings on 20th & 21st

October are still to go ahead). It is noted that not all homes in Melksham Without are covered by the Melksham Independent News (e.g. Redstocks, Sandridge) or to some homes covered by the boundary reviews with those parishes on the outer ring of the Melksham Without boundary namely Seend and Broughton Gifford. There are local village publications, but the timescales are so short that the Parish Council is unable to advertise the meetings in the Bowerhill Villager (published monthly) and the Shaw & Whitley Connect (published every two months).

Melksham Town Council have provided no evidence that their request for both the Town and Parish Councils to be dissolved and a new Council to be created is as a result of the views of local people; or that they sought the views of local people before making the request.

8. b) the 2007 Act places a duty on principal authorities to have regard to the need to secure that any community governance for the area under review reflects the identities and interests of the local community in that area, and that it is effective and convenient; relevant considerations which influence judgements against these two principal criteria include the impact on community cohesion, and the size, population and boundaries of the proposed area:

The Parish Council consider that they have a unique understanding of the distinct character of the 5 separate villages/areas in the Melksham Without Parish and that the dissolution of the Parish Council and the creation of a new Council with the Town & Without parishes together will mean that the separate, distinct identities of the villages of Shaw, Whitley, Beanacre, Berryfield and Bowerhill and the East of Melksham housing development will be diluted and threaten their community cohesion. A cohesive community is one where there is a common vision and a sense of belonging for all communities.

Villagers feel passionately about retaining their village identities, so ably demonstrated by the strength of feeling at recent planning committee meetings when residents gathered together to protest against the recommendation of SHLAA sites (Strategic Housing Land Allocation Assessments) that could lead to the coalescence of Shaw with Whitley and of both to Melksham (see Mins 17th August 2015 MWPC Full Council meeting) and of that of the potential of coalescing Bowerhill with Melksham (see comments against planning application for "Pathfinder Way" W/14/04846 refused); the prevention of coalescence is also supported by the Core

Strategy. These separate village identities are recognized and encouraged by Melksham Without Parish Council who engage and support with grant funding the variety of action groups such as BRAG (Bowerhill Residents Action Group), BASRAG (Berryfield and Semington Road Action Group) and CAWS (Community Action: Whitley & Shaw). There is a real danger that their voice will be lost if they became part of a much bigger boundary with areas of the town that are more densely populated having a louder voice. Melksham Without regularly conducts public consultation exercises in these distinct areas to seek their views, for example in Shaw & Whitley on 11th July 2015 and in Bowerhill on 19th September 2015, and would query if this depth of seeking views in these areas would continue if the villages were to become part of a bigger town and parish area. The parish council also provide grant funding for local village magazines/newsletters in the parish including the Bowerhill Villager, the Shaw & Whitley Connect magazine and newsletters published by BASRAG (Berryfield and Semington Road Action Group).

The community cohesion in Bowerhill is very strong, demonstrated by the very good work of BRAG (Bowerhill Residents Action Group); which has just been recognized as "outstanding" by the RHS It's Your Neighbourhood awards in September 2015, and yet the work they do in setting up, maintaining and developing the picnic area and bridleway at the Canalside is supported in practical and monetary ways by Melksham Without Parish Council despite the area being in the parish of Seend. The Parish Council provide grant funding for BRAG to enable them to obtain public liability insurance to cover their volunteers; they take on new assets to ensure ongoing maintenance and insurance cover and even provide the services of their Parish Caretaker to empty the large bin provided, on a weekly basis. The people of Bowerhill clearly have taken "ownership" of this area and the suggestion of the Melksham Without Parish Council is that the boundary should be moved to ensure that this land, on the opposite side of the canal from Seend, should be in Melksham Without, in the Bowerhill & Beanacre Ward. This does not affect any housing, but would address the fact that Melksham Without Parish Council already services the area.

15. In many cases making changes to the boundaries of existing parishes, rather than creating an entirely new parish, will be sufficient to ensure that community governance arrangements to continue to reflect local identities and facilitate effective and convenient local government. For example, over

time communities may expand with new housing developments. This can often lead to existing parish boundaries becoming anomalous as new houses are built across the boundaries resulting in people being in different parishes from their neighbours.

Melksham Without Parish Council recognize this and have therefore recommended that the boundary in the Town at the edge of the former George Ward school site be redrawn so that all of the new housing proposed under planning application W/14/11295 is within the town, rather than approx 60 of 266 houses falling within the Parish. The boundary should follow the A365 and then follow Dunch Lane rather than cut across the line of the former tennis courts on the former school site.

The Parish Council also concedes that the new Eastern Distributor road that encapsulates the approx 800 new houses on the East of Melksham housing estate, would be a desired redrawn boundary for the 733 houses that are currently within the parish, but would be logical to become part of the Melksham Town boundary as the community has expanded with this new housing development. Currently, some houses in Skylark Road and Rosemary Way are in both the parish and town.

However, this is the only area where there has been an expansion of housing and the boundaries have become anomalous and built across boundaries, and so the Parish Council sees no need for the town and parish councils to be dissolved and one bigger council set up to cover both areas, the boundary between Town and Without is accentuated by the A350/A365 Western Way and rural buffers and therefore the redrawing of the boundary to the "Eastern Way" eastern distributor road would suffice.

16. A community governance review offers an opportunity to put in place strong, clearly defined boundaries, tied to firm ground features, and remove the many anomalous parish boundaries that exist in England.

This stated reason is behind the requests of Melksham Without Parish Council for the 3 small schemes proposed.

1. Land at A365/Dunch Lane - boundary to be redrawn so that follows the A365 and then Dunch Lane rather than a former field boundary that predates the building of the George Ward school which is now being replaced by housing (reserved matters permission granted 23/09/15).

2. Land at Seend - boundary to be redrawn so that the boundary follows the line of the canal, rather than land on the opposite side of the canal from Seend belonging to Seend but serviced and maintained by Melksham Without Parish Council, with a clear sense of ownership and belonging to the people of Bowerhill.

3. Land common to both Broughton Gifford and Melksham Without - boundary to be withdrawn so there is a clear delineation, with the river becoming the boundary.

The Parish Council also concedes that the boundary at the East of Melksham may be better served if redrawn around the new housing development with the boundary to become the eastern distributor road, which the Parish Council has named "Eastern Way" with the Street Naming department at Wiltshire Council (Sept 2015) which would join and become continuous with the boundary at the other side of the parish which follows the A350/A365 Western Way.

23. Ultimately, the recommendation made in a community governance review ought to bring about improved community engagement, better local democracy and result in more effective and convenient delivery of local services.

The Parish Council does not believe that the proposal to dissolve the Town and Parish Council and create one new Council demonstrates any of the above. In fact, it argues that there is better community engagement and local democracy now, under the current boundaries.

To enable a manageable council, a newly created council would presumably have approx 17 councillors and that number is still large and unwieldy. When added together, the population of the two councils together makes the representation per councillor very high. The councillors are volunteers and it imposes a high burden of responsibility on those councillors with such high representation. It would therefore discourage those of a working age to become councillors, and thus the council is not therefore representative of its electorate. There are some councils that struggle to fill seats, and so the parish council feels it is a waste to cut the number of councillors by so many.

As an example, the current Melksham Without Parish councillors represent a figure of 498 electorate each, 273 houses. However, if a new council was created covering both the town and parish, and 17 councillors were appointed then each councillor would represent 1,052 electorate each, and 606 houses. This change would not bring greater democracy.

The parish council already actively engages with the members of its communities, and actively supports and facilitates the start up of action groups, for example CAWS was set up in early 2015 and BRAG has been long established. Assets in the community are also community led with management committees, supported with practical advice as well as grant funding, running village halls and playing fields in the Melksham Without Parish area.

The parish council believes it already provides effective and convenient delivery of services to its residents. The average Band D cost across the 10,181 parishes (town and parish councils) in England for 2015-16 is £54.12¹, for Melksham Without this was below this average at £53.32 whereas the Town Council charge is £87.82. This was a significant increase for Melksham Without on previous years, as £30,000 was added to the 2015/16 budget for a specific project at Shaw Play Area. The average Band D figure for 2014/15 was £41.62 and has remained under that level for many years.

The play area at Beanacre, owned and maintained by the parish council, is visited and used by many town residents, as are the playing field facilities at both Shaw and Bowerhill Playing fields - although owned and maintained by Melksham Without Parish Council both the playing fields have bookings from many town residents by a variety of football teams. The Bowerhill Sports field is the home ground to AFC Melksham, and this year to 14 Melksham Town Youth teams. This means that Melksham Without parish council is providing facilities for town residents. However, King George V playing field and play area in the Town, as with others in the town, are owned and maintained by Wiltshire Council and therefore residents of Melksham Without are also paying to support those facilities through their council tax.

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- ¹ published by the Dept of Communities and Local Government
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/444971/Council_tax_statistics_for_town_and_parish_councils_2015-16_England.pdf

The Town Council proposal does not provide evidence of how this new council will improve the effectiveness and delivery of services to residents of Melksham Without. In fact, without such a clear line of communication, with elected councillors living and representing distinct areas in the parish one could question if the provision of services in the community facilities such as village halls and playing fields, such as toddler groups, friendship clubs and lunch provision for vulnerable groups could suffer. The parish council always supports the provision of services in the parish and that residents of the parish should not have to always make the trip into town to access services; this could be jeopardized if there was a more central, one stop shop approach to providing services in the town and without parish. The town council makes the argument that the services they provide in the town are used by the residents of Melksham Without and therefore they should contribute to them. However, the parish council takes issue with that claim and queries what services the town council provide. The majority of services in the town, such as public toilets, the library, King George V playing field is actually owned and maintained by Wiltshire Council and not the Town Council. The town council provide a couple of playing fields and allotments, but so do the parish council with residents of the town regularly using the playing fields at both Shaw and Bowerhill for training and matches as the pitches are hired by local teams. The Town Council provides the Assembly Hall, but the Parish Council owns Shaw Village Hall, and actively supports with grant aid Whitley Reading Rooms, Bowerhill Village Hall, Berryfield Village Hall and the church rooms at St Barnabas Church, Beanacre which undertakes the role of a village hall in Beanacre. The parish council also provides grant aid to halls in the town such as the Riverside Club and the Rachel Fowler Centre; as well as Melksham Christmas Lights, Melksham Carnival and Melksham Party in the Park which are events held in the Town.

30. Reorganisation of community governance orders creating new parishes, abolishing parishes or altering their area can be made at any time following a review. However for administrative and financial purposes (such as setting up the parish council and arranging its first precept), the order should take effect on the 1 April following the date on which it's made. Electoral arrangements for a new or existing parish council will come into force at the first elections to the parish council following the reorganization order.

Can Wiltshire Council please explain when they would make an order relating to the abolition of the two councils and the setting up of a new one, does this guidance mean that the councils would be dissolved in April 2016? Would this trigger an election? Or would you wait and any change would not take place until the unitary elections in May 2017? Can you please provide your interpretation of these dates and reorganization orders, and you plan if this recommendation is approved.

34In the case of a community governance review where a parish council already exists as a local authority, it too should be consulted. Other bodies might include local businesses, local public and voluntary organizations – such as schools or health bodies. The principal authority must take into account any representations it receives as part of a community governance review.

AND

35. Principal councils must consider the wider picture of community governance in carrying out their reviews. In some areas there may be well established forms of community governance such as local residents' associations, or community forums which local people have set up and make a distinct contribution to the community.

Melksham Without Parish Council asks how Wiltshire Council has consulted with local organizations, schools etc. Especially when there are well known local groups such as BRAG (Bowerhill Residents Action Group) who have regular contact with the Area Board through the grant funding process and planning process and therefore known to Wiltshire Council. Residents' Associations are alive and well in the parish such as at Ludlow Hewitt Sheltered Housing. The Parish Council have not been asked to provide details of any local groups, but Wiltshire Council will obviously know of the schools in the areas affected, and the businesses as they know who pays business rates. Could Wiltshire Council please share this consultation piece with the Parish Council including any responses received.

37. Principal Councils are required to complete the review, including consequential recommendations to the LGBCE for related alterations to the boundaries of principal area wards and/or divisions, within 12 months of the start of the community governance review. The review begins when the council publishes terms of reference of the review and concludes when the council publishes the recommendations made in the review.

Wiltshire Council began the process at the beginning of April 2014 and presumably will be 7 months past the 12 month deadline when it makes its recommendations on 24th November 2015.

38. Principal councils will need to build into their planning process for reviews reasonable periods for consultation with local electors and other stakeholders, for the consideration of evidence presented to them in representations, as well as for decision-making.

The Parish Council does not consider that reasonable time has been given to local electors for consultation. See point 3 above, about taking into account local peoples' views. A decision is being made by Wiltshire Council on 24th November and dates set for public consultation meetings were only advised to the Parish Council on 6th October with leaflets going out to residents via the local newspaper on the 21st October which will be delivered over the next few days.

The Parish Council has not been advised of any cut off date for making representations online but presumably the cut off will not be the 23rd November, as officers and the working party will have to be collating the information and reporting on it. The parish council feel that a cut off date should be published to inform residents to ensure that they are not commenting after the closing date. This would also apply to any residents that are not online and completing a hard copy survey.

45. As stated I the 2006 White Paper parish councils are an established and valued form of neighbourhood democracy and management. They are not only important in rural areas but increasingly have a role to play in urban areas.

One of the reasons stated by the Town Council for the dissolution of both councils and the creation of a new one is that they see duplication of effort with both councils meeting on Monday evenings reviewing the same things. The parish council disputes this and maintains that it represents the rural view and therefore often has a different opinion than that of the Town Council. An example is the recent planning application for the former George Ward school site for 266 houses (approved 23/09/15). Although both councils' planning committees were consulted on the application as the boundary runs through the site. Only the parish council requested that an

adequate footpath be provided so that residents of the new housing could access the local facilities safely on foot or by cycle. This includes access to the local primary school at Shaw, the churches at Whitley and Shaw, the play group and other groups who meet at Whitley Reading Rooms and the whole host of activities at Shaw Village hall such as pre-school, friendship club, WI.

47. An important aspect to approaching sustainable communities is allowing local people a say in the way their neighbourhoods are managed. One of the characteristics of a sustainable community is the desire for a community to be well run with effective and inclusive participation, representation and leadership. This means:

- a) representative, accountable governance systems which both facilitate strategic, visionary leadership and enable inclusive, active and effective participation by individuals and organizations; and**
- b) effective engagement with the community at neighbourhood level including capacity building to develop the community's skills, knowledge and confidence**

The parish council believes that this is already achieved by the existing two councils. The parish council believe that they already do this and it would be diluted and not enhanced by the dissolution of the two councils and setting up of a new, bigger one. The parish council already has resilient communities recently demonstrated by the active flood plan that the villages of Shaw and Whitley have with sandbags stored in place with means of distribution, products such as walkie talkies, pumps, generators and ration packs provided by grant funding from Southern Electric, and trained flood wardens in place; all supported and facilitated by the parish council. This demonstrates the building of the community's skills, knowledge and confidence, alongside their own action groups and recent consultation events and ability to obtain grants in their own right. The parish council have taken an holistic approach and are happy to cross boundaries and work with other councils when the need arises with the approach to the flood plan being based on the flow of water rather than parish boundaries and the trained flood wardens include those of Beanacre which is in the parish, but also those from Atworth (neighbouring parish) and Shurnhold (in the town boundary).

As per point 23 above, the town and parish residents have good representation per electorate by elected councillors. It is not that the

councils have vacancies and lots of co-opted councillors; there is currently effective representation, participation and leadership.

50. Parish Councils continue to have two main roles: community representation and local administration. For both purposes it is desirable that a parish should reflect a distinctive and recognizable community of place, with its own sense of identity. The views of local communities and inhabitants are of central importance.

The residents have a much better representation under the current system; see point 23 above about the numbers of electorate represented by councillors at present.

51. The identification of a community is not a precise or rigid matter. The patterns of daily life in each of the existing communities, the local centres for education and childcare, shopping, community activities, worship, leisure pursuits, transport facilities and means of communication generally will have an influence. However, the focus of people's day to day activities may not be reflected in their feeling of community identity. For instance, historic loyalty may be to a town but the local community of interest and social focus may lie within a part of the town with its own separate identity.

The parish council has a very clear understanding of this and fears that the five distinct identities of the separate parts of the parish will be lost if the parish council is dissolved and the villages become part of a larger council with the town. Children from Shaw, Whitley and Beanacre attend the secondary school in Corsham; and Broughton Gifford & Holt scouts; they also attend Atworth youth club. Children from Bowerhill attend play group and the primary school in Seend. These nuances are recognized by the parish council and these external volunteer groups are supported with grant funding by the parish council as they understand that they are attended by the residents of Melksham Without. There are concerns that the whole, new council will become Melksham Town centric, with much less regard for the relationships that residents from Without have with their other neighbouring parishes such as Atworth, Lacock, Broughton Gifford, Seend etc.

56. Parish Councils can contribute to the creation of successful communities by influencing the quality of planning and design of public spaces and the built environment, as well as improving the management and maintenance of such amenities.

Melksham Without Parish Council does contribute to the creation of successful communities already, and recognizes the diverse settlements in the parish such as the historic villages of Shaw, and Whitley; the industrial estate in Bowerhill and the new development East of Melksham. It actively seeks funding from a variety of sources and regularly requests and uses s106 funding. It has taken on community assets from Wiltshire Council such as Bowerhill Playing Field and has been instrumental in the project for the existing pavilion to be demolished and a new one rebuilt for the benefit of the local community; obtained Lottery funding towards new allotments; Landfill funding for a new MUGA at Shaw and s106 funding for a new one at Bowerhill. It consistently consults with its residents as to what their needs and aspirations are, and documents this with external bodies such as Wiltshire Council in the Open Spaces Study recently undertaken. The Parish Council does not see any improvement or better quality of contribution to successful communities if it became part of a larger council, more that it would become more diluted. The urban view will have a larger voice as a large population of a newly created council will be urban, not rural. At present the rural view is considered within the context of Melksham Without. As the majority of development will take place in Melksham Without, and not the Town, it is right that the rural view of these areas is respected. There is already a designated area for a Melksham Neighbourhood Plan that covers both the town and Without and so there is already joint working on cohesive planning issues without the need to create one new council.

58. It is clear that how people perceive where they live – their neighbourhoods – is significant in considering the identities and interests of local communities and depends on a range of circumstances, often best defined by local residents. Some of the factors which help define neighbourhoods are: the geography of an area, the make-up of the local community, sense of identity, and whether people live in a rural, suburban, or urban area.

AND

59. Parishes in many cases may be able to meet the concept of neighbourhoods in an area. Parishes should reflect distinctive and recognizable communities of interest, with their own sense of identity. Like neighbourhoods, the feeling of local community and the wishes of local inhabitants are the primary considerations.

This guidance keeps coming back to the views of local people, their sense of identity and their rural or urban view. How will Wiltshire Council be receiving and interpreting the views of local people? Will it be weighting the views of an urban population of the town which has almost double the population of those in Without?

65. Wider initiatives such as the Quality Parish Scheme and charters agreed between parish councils and principal councils also help to give a greater understanding of securing effective and convenient local government. In such cases, parish and town councils which are well managed and good at representing local views will be in a better position to work closely with partner authorities to take more responsibility for shaping their area's development and running its services.

Melksham Without Parish Council is perfectly capable of taking responsibility for developing and running services in its own parish, without having to become a new council with the town. Melksham Without Parish Council was the first council in Wiltshire to become accredited as a Quality Council when the scheme was introduced in 2009. All but one of its Councillors are elected rather than co-opted and their Clerk is qualified to CiLCA level. The parish has a large enough electorate, precept and reserves to be able to manage its own affairs. It is not a small village satellite to a big town that would benefit from the experience and precept of the town. It has its own population of circa 7,500 and is the largest rural parish in Wiltshire, covering an area of 2,904 hectares (7,173 acres).

78. The Local Government Commission for England in its 1993 Report *Renewing Local Government in the Shires* makes the point that there is a long history of attempts to identify ideal minimum and maximum sizes for local authorities. Instead its preference was for authorities to be based on natural communities and reflecting people's choices. This is even truer today, particularly at the most local level of government.

The Parish Council believes that the current set up reflects the natural communities with the 5 distinct areas of the parish having their own identity, but grouped together to provide a cohesive group with a rural view, that has a large enough electorate already to be in a good position to develop and run its own local services.

80. The general rule should be that the parish is based on an area which reflects community identity and interest and which is of a size which is

viable as an administrative unit of administration. This is generally because of the representative nature of parish councils and the need for them to reflect closely the identity of their communities. It is desirable that any recommendations should be for parishes or groups of parishes with a population of a sufficient size to adequately represent their communities and to justify the establishment of a parish council in each. Nevertheless as previously noted, it is recognized that there are enormous variations in the sizes of parishes, although most parishes are below 12,000 in population.

The number of electors in Melksham Without is 6,484 and in Melksham Town 11,405². As the population of the Town is therefore already above the average 12,000 there should not be a need to create a much bigger Council with a much larger than average population. As per point 23 above, the Parish Council does not believe that one, new, bigger Council will improve local democracy, in fact it argues the opposite; that this would mean that the council would no longer closely reflect the identity of its communities.

81. A parish council should be in a position to provide some basic services and many larger parishes will be able to offer much more to their local communities.

The parish council feels strongly that it is already well placed to provide services to its community, is large enough with an electorate of 6,484 and precept for 2015/16 of £166,423.59; and does not need to join with the Town Council to achieve this.

82. There may be cases where larger parishes would best suit the needs of the area. These might include places where the division of a cohesive area would not reflect the sense of community that needs to lie behind all parishes; or places where there were no recognizable smaller communities.

Melksham Without parish council believes that it already has very recognizable smaller communities, for example, this is reflected by the annual entries into the CPRE Best Kept Village competition where individual entries are made for Shaw, Whitley, Beanacre, Berryfield and Bowerhill. The new East of Melksham housing estate has its separate identity and the Parish Council have recognized that this may better fit within the town boundary.

² As per Jim Waite, Elections Officer in Feb 2014

83. As far as boundaries between parishes are concerned, these should reflect the “no man’s land” between communities represented by areas of low population or barriers such as rivers, roads or railways. They need to be, and be likely to remain, easily identifiable.

AND

85. A review of parish boundaries is an opportunity to put in place strong boundaries, tied to firm ground detail, and remove anomalous parish boundaries.

The 3 small schemes proposed by Melksham Without parish council, all request a boundary review to reflect the physical features on the ground. With the request for the boundary review at Seend to use the canal as the boundary; the request for Broughton Gifford to use the river and the request for the former George Ward school site to use the A365 and Dunch Lane. It also concedes that the boundary to the east of Melksham would be better served by the eastern distributor road.

The boundary between Melksham and Melksham Without is already secured by a natural rural buffer and the A350/A365 Western Way.

90. If a principal council chooses to establish a parish council, or if an existing parish whose boundaries are being changed has a parish council, the principal authority must consult on, and put in place the necessary electoral arrangements for that parish.

What would this look like for a newly created council? How can residents make an accurate judgement on the benefits of a new single council if they are not aware on what warding or representation would be proposed for such a new parish?

114. In some cases, it may be preferable to group together parishes so as to allow a common parish council to be formed. Degrouping may offer the reverse possibilities perhaps where local communities have expanded. Such proposals are worth considering and may avoid the need for substantive changes to parish boundaries, the creation of new parishes or the abolition of very small parishes, where, despite their size, they still reflect community interests. It would be inappropriate for it to be used to build artificially large units under single parish councils.

Melksham Without Parish Council believes that this would be an artificially large unit if both the town and parish council were dissolved and a new

council created. The parish and town councils are large enough in their own right to exist and the parish council sees little benefit in them being dissolved and a new one created.

125. About 90% of the geographical area of England is covered by a parish, and this is mostly in rural and semi-rural areas. So, most populated rural areas already have a structure of local government that includes parishes and many of these have been in existence for hundreds of years. It is desirable that any changes do not upset historic traditions but do reflect changes that have happened over time, such as population shift or additional development, which may have led to a different community identity.

Apart from the new development to the east of Melksham, which has its own boundary review proposed, the parish council sees no need to change the current boundaries to dissolve Melksham Without Parish Council which has been in existence since 1894.

127. In rural areas, the Government wants to encourage the involvement of local people in developing their community and having a part to play in shaping the decisions that affect them. A parish can be a useful and democratic means of achieving this.

The parish council strongly believes that this is what they currently achieve for the rural and semi-rural separate communities that it represents in Melksham Without. Any proposal to dissolve the parish council and set up a new one with the town would detract from the statement above in point 127 rather than enhance it.

147. The purpose of a review undertaken by a principal council is likely primarily to concern the administrative boundaries or a new or existing parish. However, in addition to these primary concerns, principal authorities will also need to consider the governance of new or altered parishes. The principal council must have regard to the need for community governance within the area under review to reflect the identities and interests of the community in that area, to ensure that the governance is effective and convenient.

Points 148 - 176 cover Electoral Arrangements such as

- a) Ordinary year of elections
- b) Council size
- c) Parish warding

The guidance states that any *Governance Review* should cover *Electoral Arrangements*, and yet none of these have been proposed and therefore not consulted on for the proposal for the creation of a new council covering *Melksham and Melksham Without*.

Melksham Without Parish Council
12th October 2015