

The Bookhams
Residents'
Association

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Peter Seaward
Chairman, Bookhams Residents' Association

CC. Sir Paul Beresford MP, House of Commons, London

26 November 2022

Dear Ms Ingram

COMPLAINT: Local Government Boundary Commission for England - Mole Valley District Council Ward Boundary Review

The Bookhams Residents' Association (BRA) is not satisfied that the Local Government Boundary Commission's (LGBC) proposals for Mole Valley District Council (MVDC) ward boundaries, meet its statutory requirements. In support of the BRA, and other like minded MVDC community groups, our Member of Parliament has agreed to make an early day motion that the LGBC's proposals for MVDC not be made by Parliament.

This letter sets out the heads of our complaint and requests appropriate remedial action by the LGBC.

For context, the BRA is an apolitical voluntary membership organisation open to all residents of Great and Little Bookham. Founded in 1926 and currently with around 4,000 subscribing members, the BRA is of the community and for the community, providing a respected voice for resident's views on local issues.

The Local Government Boundary Commission's Review of Mole Valley

The BRA's complaint relates to the warding arrangements proposed by the LGBC.

Statutory Criteria

The BRA understands that when making recommendations, the LGBC must meet and balance three statutory criteria, briefly:

1. to deliver electoral equality for electors;
2. to reflect community interests and identities; and
3. to promote effective and convenient local government.

The BRA has seen later correspondence where the LGBC provides more detail on, and introduces a fourth statutory criterion which appears to be supplementary to criteria one:

1. "The need to secure, as nearly as possible, equal ratios of electors to councillors in each ward.

2. The need to reflect the identities and interests of local communities and in particular the desirability of fixing boundaries which are easily identifiable and do not break local ties.
3. The need to secure effective and convenient local government.
4. The desirability, for elections by thirds, of securing that number of councillors for each ward is divisible by three where possible, in order to enable voters to participate in annual elections."

The LGBC appears to have met the requirement of electoral equality (criteria 1 and 4) which is a simple product of mathematics. However, in so doing it has not evidenced how it considered the "where possible" caveat in criterion four. The LGBC has not recognised where it is 'not possible' to meet criteria one and four due to the balanced needs of criteria two and three.

The LGBC has failed to meet criterion two, as it has proposed a boundary between Bookham and Fetcham that does not reflect the identities and interests of the two communities. In proposing the creation of an artificial boundary and by inventing a community of "Eastwick Park" the proposal will damage local ties and community cohesion.

The LGBC has not evidenced a balanced and reasonable consideration of criteria two and three. The resulting ward proposals are therefore harmful to community interests and identities, and harmful to effective and convenient local government.

Community Interests and Identities

The LGBC's proposed Ward boundaries do not reflect the interests and identities of local communities. In the case of the Bookhams and Fetcham, the proposals are for one Fetcham Ward, with the remainder of the Fetcham community being carved-off into a nonexistent 'community' called "Eastwick Park" to form a Ward called Bookham East and Eastwick Park. The remainder of Great Bookham and Little Bookham become Bookham West Ward.

The identities of the Bookhams and Fetcham communities are based on historical settlements which have developed over many hundreds of years. They have separate community centres, community groups, shopping centres, fetes, events, churches, and residents associations, which the LGBC's proposals should, but do not respect. Any local Councillor elected to the proposed Bookham East and Eastwick Park Ward will have to attempt to understand the needs, and properly represent the interests of both Bookham and Fetcham residents artificially corralled into a nonexistent 'community'.

At the level of granularity that local Councillors need to work they will have to immerse themselves in and understand two real community's issues. From the experience of BRA members who are former Councillors, that is not a practical expectation or a manageable workload to impose on even the most conscientious local Councillor.

The BRA notes with similar concern that the LGBC's proposals for the south of Mole Valley multiply and expand the problems identified in Bookham exponentially. Namely, the proposals to create three geographically very large Wards: Mickleham, Westcott and Oakwood; Capel, Leigh, Newdigate and Charlwood; and Brockham, Betchworth, Buckland, Box Hill and Headley.

The LGBC's Technical Guidance says "Community identity and interest is harder to define than electoral equality". The hundreds of years of distinct historical settlement in the clearly defined communities of Bookham and Fetcham are clear for all to see. However, community interest and identity are not evidenced as sufficiently considered by the LGBC, and appear to have been sacrificed to make MVDC fit the simple mathematical needs of criteria one. Making the numbers fit makes the current proposals unbalanced and inappropriate.

Effective and convenient local government

The LGBC's Technical Guidance states that "Effective and convenient local government is also relatively difficult to define...". The BRA disagrees. Effective local government exists when community needs are met, through accountable elected representatives and other means, in an economic, efficient, effective and equitable manner. Convenient local government is about responsiveness, co-ordination, accountability, accessibility, and equality.

The LGBC's proposed creation of artificial communities, and others with both artificiality and also huge geographical areas is why the proposals do not meet the requirement of criterion three, promoting effective and convenient local government.

Councillors who, as noted above, will struggle to understand the multiplicity of divergent needs arising from artificial 'communities' will have unreasonably large demands placed on their capacity and time. That call on their capacity and time will undermine their ability to properly represent such interests. In such inappropriate circumstances Councillors will not be able to perform effectively as the local face of local government, nor will that be convenient for either them or their residents.

This unhappy situation will result in a dilution of informed and effective decision making by the Council, weakening of responsiveness to local needs by Councillors, and weakened accountability to the electorate.

Remedial Action Required

The LGBC has failed to identify a warding pattern for MVDC that properly balances its statutory criteria. The LGBC must therefore revise its proposals to evidence a reasonable outcome from its review based on a properly and visibly balanced exposition of its statutory responsibilities. Bookham, and Fetcham, residents do not want to end up having to vote for a 'local' Councillor in a Ward that does not respect where they live.

The BRA's earlier response to the LGBC's draft proposals demonstrated that the LGBC had established precedent (St Albans) where it had not sacrificed community interests and identity, and effective and convenient local government in favour of mechanically following a mathematical formula, to provide a better match between Councillors, Wards and Communities. Two member and single member wards were agreed because of local circumstances.

The BRA has seen no evidence from the LGBC as to why its, and others, reasonable proposals should not be agreed i.e. two Bookham wards one of three Councillors the other of two. Similarly with Fetcham retaining two two-member wards. A total of nine councillors, which is of course divisible by three.

The LGBC being independent and impartial is a good thing. However, independence and impartiality, together with expertise, must be tempered by and exercised in a way that is demonstrably reasonable to the average person in the street. The LGBC's current proposals are not balanced with that accountability, are therefore unacceptable, and should be revised.

We look forward to hearing from you.

Yours sincerely

P Seaward

Chairman, Bookhams Residents' Association

Note. The BRA's earlier responses will be in the LGBC's files, or can be seen on the BRA website.