

Final recommendations on the
future electoral arrangements
for Babergh in Suffolk

Report to the Secretary of State for the
Environment, Transport and the Regions

June 2001

LOCAL GOVERNMENT COMMISSION FOR ENGLAND

This report sets out the Commission's final recommendations on the electoral arrangements for the district of Babergh in Suffolk.

Members of the Commission are:

Professor Malcolm Grant (Chairman)
Professor Michael Clarke CBE (Deputy Chairman)
Peter Brokenshire
Kru Desai
Pamela Gordon
Robin Gray
Robert Hughes CBE

Barbara Stephens (Chief Executive)

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A large map illustrating the proposed ward boundaries for Great Conard and Sudbury is inserted inside the back cover of the report.



Local Government Commission for England

26 June 2001

Dear Secretary of State

On 27 June 2000 the Commission began a periodic electoral review of Babergh under the Local Government Act 1992. We published our draft recommendations in January 2001 and undertook an eight-week period of consultation.

We have now prepared our final recommendations in the light of the consultation. We have substantially confirmed our draft recommendations, although some modifications have been made (see paragraph 112-113) in the light of further evidence. This report sets out our final recommendations for changes to electoral arrangements in Babergh.

We recommend that Babergh District Council should be served by 43 councillors representing 27 wards, and that changes should be made to ward boundaries in order to improve electoral equality, having regard to the statutory criteria. We recommend that the Council should continue to hold whole council elections every four years.

The Local Government Act 2000 contains provisions relating to changes to local authority electoral arrangements. However, until such time as Orders are made implementing those arrangements we are obliged to conduct our work in accordance with current legislation, and to continue our current approach to periodic electoral reviews.

I would like to thank members and officers of the District Council and other local people who have contributed to the review. Their co-operation and assistance have been very much appreciated by Commissioners and staff.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Malcolm Grant'.

PROFESSOR MALCOLM GRANT
Chairman

SUMMARY

The Commission began a review of Babergh on 27 June 2000. We published our draft recommendations for electoral arrangements on 9 January 2001, after which we undertook an eight-week period of consultation.

- **This report summarises the representations we received during consultation on our draft recommendations, and contains our final recommendations to the Secretary of State.**

We found that the existing electoral arrangements provide unequal representation of electors in Babergh.

- **In 20 of the 30 wards the number of electors represented by each councillor varies by more than 10 per cent from the average for the District and nine wards vary by more than 20 per cent from the average.**
- **By 2005 electoral equality is not expected to improve, with the number of electors per councillor forecast to vary by more than 10 per cent from the average in 21 wards and by more than 20 per cent in 12 wards.**

Our main final recommendations for future electoral arrangements (Figures 1 and 2 and paragraphs 112-113) are that:

- **Babergh District Council should have 43 councillors, one more than at present;**
- **there should be 27 wards, instead of 30 as at present;**
- **the boundaries of 24 of the existing wards should be modified and six wards should retain their existing boundaries;**
- **elections should continue to take every four years.**

These recommendations seek to ensure that the number of electors represented by each district councillor is as nearly as possible the same, having regard to local circumstances.

- **In three of the proposed 27 wards the number of electors per councillor would vary by no more than 10 per cent from the district average.**
- **There would be a general continuation in these levels of electoral equality, with the number of electors per councillor in four wards, Bures St Mary, Dodnash, Glemsford & Stanstead and Pinewood, expected to vary by more than 10 per cent from the average for the district in 2005.**

Recommendations are also made for changes to parish council electoral arrangements which provide for:

- **revised warding arrangements and the redistribution of councillors for the parishes of Great Conard, Hadleigh and Sudbury.**

All further correspondence on these recommendations and the matters discussed in this report should be addressed to the Secretary of State for the Environment, Transport and the Regions, who will not make an Order implementing the Commission's recommendations before 6 August 2001:

**The Secretary of State
Department of the Environment, Transport and the Regions
Local Government Sponsorship Division
Eland House
Bressenden Place
London SW1E 5DU**

Figure 1: The Commission's Final Recommendations: Summary

Ward name	Number of councillors	Constituent areas	Map reference
1 Alton	2	Alton ward (the parishes of Stutton and Tattingsstone); Brantham ward (Brantham parish)	Map 2
2 Berners	2	Berners ward (the parishes of Chelmondiston, Freston and Woolverstone); Shotley ward (the parishes of Arwarton and Shotley)	Map 2
3 Boxford	1	Boxford ward (part – the parishes of Boxford, Edwardstone and Groton); Brett Vale (part – Lindsey and Milden)	Map 2
4 Brett Vale	1	Bildeston ward (the parishes of Bildeston, Hitcham and Wattisham); North Cosford ward (part – Brettenham parish)	Map 2
5 Brook	2	Brookvale ward (the parishes of Burstall, Chattisham, Hintlesham and Sproughton); Copdock ward (part – the parishes of Belstead, Copdock & Washbrook and Wherstead)	Map 2
6 Bures St Mary	1	<i>Unchanged</i> (the parishes of Bures St Mary, Little Cornard and Newton)	Map 2
7 Chadacre	3	Chadacre ward (the parishes of Boxted, Hartest, Lawshall, Shimpling and Somerton)	Map 2
8 Dodnash	2	<i>Unchanged</i> (the parishes of Bentley and East Bergholt)	Map 2
9 Glemsford & Stanstead	2	Glemsford ward (the parish of Glemsford); Chadacre ward (part – the parish of Stanstead)	Map2
10 Great Cornard North	2	Great Cornard North ward (part); Great Cornard South ward (part)	Large map
11 Great Cornard South	2	Great Cornard North ward (part); Great Cornard South ward (part)	Large map
12 Hadleigh North	2	Hadleigh ward (part)	Map A2
13 Hadleigh South	2	Hadleigh ward (part)	Map A2
14 Holbrook	1	<i>Unchanged</i> (the parishes of Harkstead and Holbrook)	Map 2
15 Lavenham	1	<i>Unchanged</i> (Lavenham parish)	Map 2
16 Leavenheath	1	Leavenheath ward (part – the parishes of Assington and Leavenheath)	Map 2
17 Long Melford	2	<i>Unchanged</i> (the parishes of Alpheton and Long Melford)	Map 2

	Ward name	Number of councillors	Constituent areas	Map reference
18	Lower Brett	1	Polstead & Layham ward (the parishes of Polstead and Layham); West Samford ward (part – the parishes of Higham, Raydon and Shelley)	Map 2
19	Mid Samford	2	Capel & Wenham ward (the parishes of Capel St Mary, Wenham Magna and Wenham Parva); West Samford ward (part – the parishes of Holton St Mary and Stratford St Mary)	Map 2
20	Nayland	1	Leavenheath ward (part – Stoke by Nayland parish); Nayland ward (Nayland-with-Wissington parish)	Map 2
21	North Cosford	1	Brett Vale ward (the parishes of Brent Eleigh, Chelsworth, Kettlebaston, Lindsey, Milden and Monks Eleigh); North Cosford ward (part – the parishes of Thorpe Morieux and Preston St Mary)	Map 2
22	Pinewood	2	Copdock ward (part – Pinewood parish)	Map 2
23	South Cosford	1	Elmsett ward (the parishes of Aldham, Elmsett, Nedging-with-Naughton, Semer and Whatfield); Brett Vale (part – the parish of Kersey)	Map 2
24	Sudbury East	2	Sudbury East ward (part); Sudbury North ward (part)	Large map
25	Sudbury North	2	Sudbury North ward (part)	Large map
26	Sudbury South	2	Sudbury East ward (part); Sudbury North ward (part); Sudbury South ward	Large map
27	Waldingfield	2	<i>Unchanged</i> (the parishes of Acton, Chilton, Great Waldingfield and Little Waldingfield)	Map 2

Notes: 1 The whole district is parished.

2 Maps 2, A1, A2 and the large map in the back of the report illustrate the proposed wards outlined above.

3 All proposed ward boundaries are based upon the revised parish boundaries which come into effect in April 2001.

Figure 2: The Commission's Final Recommendations for Babergh

Ward name	Number of councillors	Electorate (2000)	Number of electors per councillor	Variance from average %	Electorate (2005)	Number of electors per councillor	Variance from average %
1 Alton	2	3,031	1,516	-1	3,137	1,569	-5
2 Berners	2	3,053	1,527	-1	3,353	1,677	2
3 Boxford	1	1,735	1,735	13	1,810	1,810	10
4 Brett Vale	1	1,576	1,576	3	1,644	1,644	0
5 Brook	2	3,206	1,603	4	3,294	1,647	0
6 Bures St Mary	1	1,397	1,397	-9	1,437	1,437	-13
7 Chadacre	1	1,560	1,438	-6	1,579	1,579	-4
8 Dodnash	2	2,870	1,435	-7	2,942	1,471	-11
9 Glemsford & Stanstead	2	2,806	1,403	-9	2881	1441	-12
10 Great Cornard North	2	2,988	1,494	-3	3,231	1,616	-2
11 Great Cornard South	2	2,989	1,495	-3	3,251	1,626	-1
12 Hadleigh North	2	2,725	1,363	-11	3,237	1,619	-2
13 Hadleigh South	2	3,007	1,504	-2	3,166	1,583	-4
14 Holbrook	1	1,652	1,652	7	1,713	1,713	4
15 Lavenham	1	1,568	1,568	2	1,615	1,615	-2
16 Leavenheath	1	1,462	1,462	-5	1,510	1,510	-8
17 Long Melford	2	3,157	1,579	3	3,164	1,582	-4
18 Lower Brett	1	1,689	1,689	10	1,734	1,734	5
19 Mid Samford	2	3,366	1,683	9	3,423	1,712	4
20 Nayland	1	1,537	1,537	0	1,556	1,556	-5
21 North Cosford	1	1770	1,770	15	1,814	1,814	10
22 Pinewood	2	2,622	1,311	-5	3,646	1,823	11
23 South Cosford	1	1,683	1,683	9	1,768	1,768	7

	Ward name	Number of councillors	Electorate (2000)	Number of electors per councillor	Variance from average %	Electorate (2005)	Number of electors per councillor	Variance from average %
24	Sudbury East	2	3,135	1,568	2	3,376	1,688	3
25	Sudbury North	2	3,111	1,556	1	3,447	1,724	5
26	Sudbury South	2	3,314	1,657	8	3,450	1,725	5
27	Waldingfield	2	3,106	1,553	1	3,593	1,797	9
	Totals	43	66,115	-	-	70,771	-	-
	Averages	-	-	1,538	-	-	1,646	-

Source: *Electorate figures are based on Babergh District Council's submission.*

Notes: *1 The 'variance from average' column shows by how far, in percentage terms, the number of electors per councillor varies from the average for the district. The minus symbol (-) denotes a lower than average number of electors. Figures have been rounded to the nearest whole number.*

2 All proposed ward boundaries are based upon the revised parish boundaries which come into effect in April 2001.

1 INTRODUCTION

1 This report contains our final recommendations on the electoral arrangements for the district of Babergh in Suffolk. We have now reviewed the seven districts in Suffolk as part of our programme of periodic electoral reviews (PERs) of all 386 principal local authority areas in England. Our programme started in 1996 and is currently expected to be completed by 2004.

2 This was our first review of the electoral arrangements of Babergh. The last such review was undertaken by our predecessor, the Local Government Boundary Commission (LGBC), which reported to the Secretary of State in September 1976 (Report No. 161). The electoral arrangements of Suffolk County Council were last reviewed in 1982 (Report No. 429). We intend reviewing the County Council's electoral arrangements in 2002.

3 In undertaking these reviews, we have had regard to:

- the statutory criteria contained in section 13(5) of the Local Government Act 1992, ie the need to:
 - (a) reflect the identities and interests of local communities; and
 - (b) secure effective and convenient local government;
- the *Rules to be Observed in Considering Electoral Arrangements* contained in Schedule 11 to the Local Government Act 1972.

4 We are required to make recommendations to the Secretary of State on the number of councillors who should serve on the County Council, and the number, boundaries and names of wards. We can also make recommendations on the electoral arrangements for parish and town councils in the district.

5 We have also had regard to our *Guidance and Procedural Advice for Local Authorities and Other Interested Parties* (fourth edition published in December 2000), which sets out our approach to the reviews.

6 In our *Guidance*, we state that we wish wherever possible to build on schemes which have been prepared locally on the basis of careful and effective consultation. Local interests are normally in a better position to judge what council size and ward configuration are most likely to secure effective and convenient local government in their areas, while allowing proper reflection of the identities and interests of local communities.

7 The broad objective of PERs is to achieve, so far as practicable, equality of representation across the district as a whole. Having regard to the statutory criteria, our aim is to achieve as low a level of electoral imbalance as is practicable. We will require particular justification for schemes which would result in, or retain, an electoral imbalance of over 10 per cent in any ward. Any imbalances of 20 per cent or more should only arise in the most exceptional circumstances, and will require the strongest justification.

8 We are not prescriptive on council size. We start from the general assumption that the existing council size already secures effective and convenient local government in that district but we are willing to look carefully at arguments why this might not be so. However, we have found it necessary to safeguard against upward drift in the number of councillors, and we believe that any proposal for an increase in council size will need to be fully justified: in particular, we do not accept that an increase in a district's electorate should automatically result in an increase in the number of councillors, nor that changes should be made to the size of a district council simply to make it more consistent with the size of other districts.

9 In July 1998, the Government published a White Paper, *Modern Local Government – In Touch with the People*, which set out legislative proposals for local authority electoral arrangements. In two-tier areas, it proposed introducing a pattern in which both the district and county councils would hold elections every two years, i.e. in year one, half of the district council would be elected, in year two, half the county council would be elected, and so on. The Government stated that local accountability would be maximised where every elector has an opportunity to vote every year, thereby pointing to a pattern of two-member wards (and divisions) in two-tier areas. However, it stated that there was no intention to move towards very large electoral areas in sparsely populated rural areas, and that single-member wards (and electoral divisions) would continue in many authorities. The proposals have been taken forward in the Local Government Act 2000 which, among other matters, provides that the Secretary of State may make Orders to change authorities' electoral cycles. However, until such time as the Secretary of State makes any Orders under the 2000 Act, we will continue to operate on the basis of existing legislation, which provides for elections by thirds or whole-council elections in the two-tier district areas, and our current *Guidance*.

10 This review was in four stages. Stage One began on 27 June 2000, when we wrote to Babergh District Council inviting proposals for future electoral arrangements. We also notified Suffolk County Council, Suffolk Police Authority, the local authority associations, Suffolk Association of Parish & Town Councils, parish and town councils in the district, the Members of Parliament with constituency interests in the district, the Members of the European Parliament for the Eastern region, and the headquarters of the main political parties. We placed a notice in the local press, issued a press release and invited the District Council to publicise the review further. The closing date for receipt of representations, the end of Stage One, was 2 October 2000. At Stage Two we considered all the representations received during Stage One and prepared our draft recommendations.

11 Stage Three began on 9 January 2001 with the publication of our report, *Draft recommendations on the future electoral arrangements for Babergh in Suffolk*, and ended on 5 March 2001. Comments were sought on our preliminary conclusions. Finally, during Stage Four we reconsidered our draft recommendations in the light of the Stage Three consultation and now publish our final recommendations.

2 CURRENT ELECTORAL ARRANGEMENTS

12 The district of Babergh lies in the south of the county of Suffolk. Its southern boundary with Essex follows, for the most part, the River Stour, while the River Orwell forms part of its eastern boundary. It comprises the towns of Sudbury, Great Cornard and Hadleigh and a large rural hinterland.

13 The district is entirely parished and comprises 76 parishes. The towns of Sudbury, Great Cornard and Hadleigh account for 40 per cent of the total population and have been the site of much of the population growth over the past few years. Pinewood, on the southern fringe of Ipswich, has also experienced some growth, which is forecast to continue. The remainder of the district is more rural in character.

14 To compare levels of electoral inequality between wards, we calculated the extent to which the number of electors per councillor in each ward (the councillor:elector ratio) varies from the district average in percentage terms. In the text which follows, this calculation may also be described using the shorthand term 'electoral variance'.

15 The electorate of the district is 66,115 (February 2000). The Council presently has 42 members who are elected from 30 wards, six of which cover the relatively urban areas of Sudbury, Great Cornard and Hadleigh, with the remainder being predominantly rural. One of the wards is represented by three councillors, 10 are each represented by two councillors and 19 are single-member wards. The whole Council is elected together every four years.

16 Since the last electoral review there has been an increase in the electorate in Babergh district, with around 35 per cent more electors than two decades ago as a result of new housing developments. The most notable increase has been in Copdock ward.

17 At present, each councillor represents an average of 1,574 electors, which the District Council forecasts will increase to 1,685 by the year 2005 if the present number of councillors is maintained. However, due to demographic and other changes over the past two decades, the number of electors per councillor in 20 of the 30 wards varies by more than 10 per cent from the district average, in nine wards by more than 20 per cent and in three wards by more than 30 per cent. The worst imbalance is in Copdock ward, where the councillor represents 152 per cent more electors than the district average.

Map 1: Existing Wards in Babergh

Figure 3: Existing Electoral Arrangements

Ward name	Number of councillors	Electorate (2000)	Number of electors per councillor	Variance from average %	Electorate (2005)	Number of electors per councillor	Variance from average %
1 Alton	1	1,058	1,058	-33	1,130	1,130	-33
2 Berners	1	1,189	1,189	-24	1,196	1,196	-29
3 Bildeston	1	1,370	1,370	-13	1,435	1,435	-15
4 Boxford	1	1,498	1,498	-5	1,571	1,571	-7
5 Brantham	1	1,973	1,973	25	2,007	2,007	19
6 Brett Vale	1	1,206	1,206	-23	1,226	1,226	-27
7 Brook Vale	1	1,865	1,865	18	1,914	1,914	14
8 Bures St Mary	1	1,397	1,397	-11	1,437	1,437	-15
9 Capel & Wenham	2	2,596	1,298	-18	2,622	1,311	-22
10 Chadacre	1	1,845	1,845	17	1,874	1,874	11
11 Copdock	1	3,963	3,963	152	5,026	5,026	198
12 Dodnash	2	2,870	1,435	-9	2,942	1,471	-13
13 Elmsett	1	1,406	1,406	-11	1,486	1,486	-12
14 Glemsford	2	2,521	1,261	-20	2,586	1,293	-23
15 Great Cornard North	2	2,868	1,434	-9	3,055	1,528	-9
16 Great Cornard South	2	3,109	1,555	-1	3,427	1,714	2
17 Hadleigh	3	5,732	1,911	21	6,403	2,134	27
18 Holbrook	1	1,652	1,652	5	1,713	1,713	2
19 Lavenham	1	1,568	1,568	0	1,615	1,615	-4
20 Leavenheath	1	2,025	2,025	29	2,083	2,083	24
21 Long Melford	2	3,157	1,579	0	3,164	1,582	-6
22 Nayland	1	974	974	-38	983	983	-42
23 North Cosford	1	1,284	1,284	-18	1,318	1,318	-22
24 Polstead & Layham	1	1,148	1,148	-27	1,172	1,172	-30
25 Shotley	1	1,864	1,864	18	2,157	2,157	28
26 Sudbury East	2	2,835	1,418	-10	3,111	1,556	-8
27 Sudbury North	2	3,479	1,740	11	3,815	1,908	13
28 Sudbury South	2	3,246	1,623	3	3,347	1,674	-1

Ward name	Number of councillors	Electorate (2000)	Number of electors per councillor	Variance from average %	Electorate (2005)	Number of electors per councillor	Variance from average %
29 Waldingfield	2	3,106	1,553	-1	3,593	1,797	7
30 West Samford	1	1,311	1,311	-17	1,363	1,363	-19
Totals	42	66,115	-	-	70,771	-	-
Averages	-	-	1,574	-	-	1,685	-

Source: Electorate figures are based on information provided by Babergh District Council.

Notes: 1 The 'variance from average' column shows by how far, in percentage terms, the number of electors per councillor varies from the average for the district. The minus symbol (-) denotes a lower than average number of electors. For example, in 2000, electors in Nayland ward were relatively over-represented by 38 per cent, while electors in Copdock ward were significantly under-represented by 152 per cent. Figures have been rounded to the nearest whole number.

2 All proposed ward boundaries are based upon the revised parish boundaries which come into effect in April 2001.

3 DRAFT RECOMMENDATIONS

18 During Stage One we received 46 representations, including a district-wide scheme from the District Council and one from the parish councils of Boxford, Edwardstone and Groton. We also received representations from the county council, a Conservative Association, 14 parish and town councils and two parish meetings, a County Councillor and 25 local residents. In the light of these representations and evidence available to us, we reached preliminary conclusions which were set out in our report, *Draft recommendations on the future electoral arrangements for Babergh in Suffolk*

19 Our draft recommendations were based on the District Council's proposals, which achieved some improvement in electoral equality. However, we moved away from the District Council's scheme in a number of areas, affecting Belstead Brook, Brook Vale, Chadacre and Long Melford wards and the town of Hadleigh, putting forward our own proposals. We proposed that:

- Babergh District Council should be served by 43 councillors, compared with the current 42, representing 26 wards, four less than at present;
- the boundaries of 24 of the existing wards should be modified, while six wards should retain their existing boundaries;
- there should be new warding arrangements and the redistribution of councillors for the parishes of Great Cornard, Hadleigh and Sudbury.

Draft Recommendation

Babergh District Council should comprise 43 councillors, serving 26 wards. The whole Council should continue to be elected every four years.

20 Our proposals would have resulted in significant improvements in electoral equality, with the number of electors per councillor in 24 of the 26 wards varying by no more than 10 per cent from the district average. By 2005 only three wards would vary by 10 per cent from the average for the district, and none would vary by more than 13 per cent.

4 RESPONSES TO CONSULTATION

21 During the consultation on our draft recommendations report, 56 representations were received. A list of all respondents is available on request from the Commission. All representations may be inspected at the offices of Babergh District Council and the Commission.

Babergh District Council

22 Babergh District Council expressed support for the majority of the recommendations, including the proposal to increase the council size from 42 to 43. However, it proposed that Higham parish be moved from our proposed Mid Samford ward into Lower Brett ward, and that Stratford St Mary parish be transferred to Dodnash ward. It also proposed that our two-member Brook ward be divided into two single-member wards, as it had proposed during Stage One. However, it stated that if the Commission were not minded to divide the proposed Brook ward, Freston parish should be located in the Berners ward. It also opposed our recommendations for a three-member Chadacre ward and requested that greater weight be given to the 'Community of Interest'. It proposed that one of the two alternatives suggested by Councillor Hodge be adopted for the north of the district (see below).

Suffolk County Council

23 We received responses from the County Council enclosing comments from interested county councillors. Councillor Gleed, member for the Brett division, opposed placing Cockfield parish within Chadacre ward due to it being separated from the remainder of that ward by the A143. Councillor Grutchfield, member for the Hadleigh division, opposed the warding of the town for reasons of community identity and the local opposition from residents. Councillor Pollard, member for the Belstead Brook division, opposed the proposed two-member Brook ward. Councillor Wood, member for the Peninsula division, also expressed a preference for single-member wards.

South Suffolk Conservative Group

24 The Conservative Group on the Council expressed opposition to combining the parishes of Chadacre and Glemsford in a three-member ward for reasons of community and rural identity. It also proposed that Brook ward be divided into two single-member wards.

Parish and Town Councils

25 The parish councils of Aldham, Alpheton, Assington, Bentley, Boxford, Brettenham, Chelsworth, Chilton, Groton, Holbrook, Kersey, Nayland-with-Wissington, Pinewood, Semer, Stoke-By-Nayland and the parish meetings of Shelley and Wenham Magna expressed support for our draft recommendations. Hadleigh Town Council proposed that Hadleigh Town be a single ward represented by four district and 15 town councillors.

26 Burstall Parish Council proposed that Brookvale ward be retained and that the parish remain within the district ward, for reasons of community identity. Capel St Mary Parish Council proposed that the parish be placed in a district ward with the Wenhams and Bentley parishes for reasons of community identity. Chattisham & Hintlesham Parish Council opposed the enlarged Brook ward including the parishes of Copdock & Washbrook, Belstead, Wherstead and Freston, for reasons of community identity. Copdock & Washbrook Parish Council proposed that our proposed Brook ward be divided into two single-member wards, Brook Vale and Belstead Brook. Freston Parish Council proposed two single-member wards for this area because of the difficulties of combining different communities either side of the A12. Alternatively it proposed that Freston parish be relocated to the Berners ward for reasons of community identity.

27 Elmsett and Great Conard parish councils supported the District Council's proposals, which were identical to our draft recommendations. Polstead Parish Council did not object to the District Council's proposals placing Higham parish in the Lower Brett ward. Boxted Parish Meeting, Cockfield Parish Council, Hartest Parish Council, Lawshall Parish Council, Preston St Mary Parish Council, Shimpling Parish Council, Somerton Parish Council and Stanstead Parish Council opposed the draft recommendations on the grounds of community identity.

28 Layham Parish Council proposed including Higham parish in our proposed Lower Brett ward for reasons of community identity. Nedging-with-Naughton Parish Council proposed no change to the parish. Stratford St Mary Parish Council opposed our draft recommendations to place the parish in a ward with Capel St Mary parish and proposed that Stratford St Mary parish be included in a ward with East Bergholt and Holton St Mary parishes for reasons of community identity. Higham Parish Meeting opposed the draft recommendation to place Higham parish in Mid Samford ward. It proposed instead that it be placed in Lower Brett ward for community identity reasons.

Member of Parliament

29 Tim Yeo, Member of Parliament for South Suffolk, expressed support for Councillor David Hodge's Stage Three submission, outlined below.

Other Representations

30 A further 14 representations were received in response to our draft recommendations from an MEP, local political groups, local organisations, councillors and residents.

31 Andrew Duff MEP, expressed concern about the impact on smaller parishes of being joined with larger parishes and the creation of a 'disproportionately large ward' in the north of the district. Suffolk Constabulary opposed the draft recommendations for the north of the district as they would cut across police sectors. Councillor Hodge, member for North Cosford ward, proposed two alternative schemes for the north of the district. Councillor Arthey, member for Berners ward, opposed the District Council's Stage Three proposals. Councillor Wood, member for Alton ward, supported the District Council's response to our draft recommendations apart from those for the north of the district around Chadacre. Councillor Lazenby, member for Elmsett ward, supported our draft recommendations. Councillor Long, member for Chadacre ward,

proposed that Hartest, Somerton, Boxted, Lawshall, Shimpling and Stanstead parishes remain in Chadacre ward. Cockfield Primary School Governing body and Cockfield Community Council opposed placing Cockfield and Thorpe Morieux parishes in separate wards as did two local residents. One local resident proposed retaining the current Chadacre and Glemsford wards. One resident from Edwardstone expressed support for the District Council's proposals for the Boxford area. The Hadleigh Society opposed our recommendation to ward the town.

5 ANALYSIS AND FINAL RECOMMENDATIONS

32 As described earlier, our prime objective in considering the most appropriate electoral arrangements for Babergh is, so far as reasonably practicable and consistent with the statutory criteria, to achieve electoral equality. In doing so we have regard to section 13(5) of the Local Government Act 1992 – the need to secure effective and convenient local government, and reflect the identities and interests of local communities – and Schedule 11 to the Local Government Act 1972, which refers to the number of electors per councillor being “as nearly as may be, the same in every ward of the district or borough”.

33 In relation to Schedule 11, our recommendations are not intended to be based solely on existing electorate figures, but also on assumptions as to changes in the number and distribution of local government electors likely to take place within the ensuing five years. We also must have regard to the desirability of fixing identifiable boundaries and to maintaining local ties which might otherwise be broken.

34 It is therefore impractical to design an electoral scheme which provides for exactly the same number of electors per councillor in every ward of an authority. There must be a degree of flexibility. However, our approach, in the context of the statutory criteria, is that such flexibility must be kept to a minimum.

35 Our *Guidance* states that we accept that the achievement of absolute electoral equality for the authority as a whole is likely to be unattainable. However, we consider that, if electoral imbalances are to be kept to the minimum, such an objective should be the starting point in any review. We therefore strongly recommend that, in formulating electoral schemes, local authorities and other interested parties should start from the standpoint of absolute electoral equality and only then make adjustments to reflect relevant factors, such as community identity and interests. Regard must be had to five-year forecasts of changes in electorates and we would aim to recommend a scheme which provides improved electoral equality over this five-year period.

Electorate Forecasts

36 The District Council submitted electorate forecasts for the year 2005, projecting an increase in the electorate of some 7 per cent from 66,115 to 70,771 over the five-year period from 2000 to 2005. It expects most of the growth to be in Copdock ward, although a significant amount is also expected in the towns of Great Cornard, Hadleigh and Sudbury. The Council has estimated rates and locations of housing development with regard to structure and local plans, the expected rate of building over the five-year period and assumed occupancy rates. Advice from the District Council on the likely effect on electorates of changes to ward boundaries has been obtained. We accept that this is an inexact science, and having considered the forecast electorates, we stated in our draft recommendations report that we were satisfied that they represented the best estimates that could reasonably be made at the time.

37 We received no comments on the Council’s electorate forecasts during Stage Three, and remain satisfied that they represent the best estimates presently available.

Council Size

38 As already explained, the Commission's starting point is to assume that the current council size facilitates effective and convenient local government, although we are willing to carefully look at arguments why this might not be the case.

39 Babergh District Council presently has 42 members. At Stage One, the District Council proposed a council size of 43 members. It stated that it had originally explored options retaining the existing 42-member council; however, it ultimately concluded that the optimum balance between electoral equality and the recognition of local community identities and interests would best be achieved under a council size of 43. The scheme proposed by Boxford, Edwardstone and Groton parish councils was also based on a 43-member council.

40 Additionally, the District Council commented that, in formulating its proposed scheme, it considered the proposed increase to be proportional to an increasingly demanding role placed on members. It further considered that these demands would continue to increase with the much greater emphasis on the local representative role and the growing involvement of members in developing community strategies in consultation with local communities.

41 We examined the district-wide schemes presented to us, as well as all other submissions, and concluded that we should adopt the District Council's proposed council size as part of our draft recommendations, in order to better reflect local community identities and to further improve the levels of electoral equality within the district as a whole. In particular, under a 43-member scheme Hadleigh, Sudbury and Great Cornard each receive the correct number of councillors for their electorates, as does the rural area. Having considered the size and distribution of the electorate, the geography and other characteristics of the area, together with the representations received, we concluded that the achievement of electoral equality and the statutory criteria would best be met by a 43-member council size.

42 At Stage Three, we received no comments on council size, and are therefore content to endorse our draft recommendation for a council size of 43 as final.

Electoral Arrangements

43 We adopted much of the Council's Stage One proposals as part of our draft recommendations. However, we have reviewed these recommendations in the light of further evidence and the representations received during Stage Three. For district warding purposes, the following areas, based on existing wards, are considered in turn:

- (a) Brett Vale, Chadacre, Glemsford, Lavenham, Long Melford and North Cosford wards;
- (b) Bildeston and Elmsett wards;
- (c) Boxford, Bures St Mary and Waldingfield wards;
- (d) Sudbury (three wards);
- (e) Great Cornard (two wards);
- (f) Capel & Wenham, Leavenheath, Nayland, Polstead & Layham and West Samford wards;

- (g) Hadleigh ward;
- (h) Brookvale, Copdock and Dodnash wards;
- (i) Alton, Berners, Brantham, Holbrook and Shotley wards.

44 Details of our final recommendations are set out in Figures 1 and 2, and illustrated on Map 2, in Appendix A and on the large map inserted at the back of this report.

Brett Vale, Chadacre, Glemsford, Lavenham, Long Melford and North Cosford wards

45 These six wards are located in the north of the district. The single-member Brett Vale ward, which comprises the parishes of Brent Eleigh, Brettenham, Chelsworth, Kettlebaston, Milden, Monks Eleigh and Thorpe Morieux, has a councillor:elector ratio 23 per cent below the district average (27 per cent below in 2005). The single-member Chadacre ward, which comprises the parishes of Boxted, Hartest, Lawshall, Shimpling, Somerton and Stanstead, has a councillor:elector ratio 17 per cent above the district average (11 per cent above in 2005). The two-member Glemsford ward, comprising the parish of Glemsford, has a councillor:elector ratio 20 per cent below the district average (23 per cent below in 2005). The single-member Lavenham ward, comprising the parish of Lavenham, and the two-member Long Melford ward, comprising the parishes of Alpheton and Long Melford, currently have the same councillor:elector ratio as the district average (4 per cent and 6 per cent below by 2005 respectively).

46 During Stage One the District Council proposed a modified single-member Chadacre ward, comprising the parishes of Boxted, Cockfield, Hartest, Lawshall and Somerton. This ward would have a councillor:elector ratio 20 per cent above the district average by 2005. It proposed a modified two-member Glemsford ward comprising Stanstead and Glemsford parishes, which would have a councillor:elector ratio 12 per cent below the district average by 2005 and a modified two-member Long Melford ward, comprising Alpheton, Long Melford and Shimpling parishes, which would have a councillor:elector ratio 6 per cent above the district average by 2005. The District Council's proposed single-member North Cosford ward would comprise the parishes of Brent Eleigh, Chelsworth, Kersey, Kettlebaston, Lindsey, Milden, Monks Eleigh, Preston St Mary and Thorpe Morieux and would have a councillor:elector ratio 2 per cent below the district average by 2005. It proposed no change to Lavenham ward.

47 Cockfield, Lawshall and Stanstead parish councils and Boxted Parish Meeting opposed the District Council's scheme for these wards, arguing that the proposed configuration did not sufficiently reflect local community identities, and proposed the retention of the existing Chadacre ward. Two local residents also opposed the District Council's proposal for Chadacre ward given that, under the existing electoral arrangements, electoral equality in the ward is better than under the proposals, which they argued would not reflect local community identities. Boxted Parish Meeting's submission also included a petition of some 59 signatures supporting the retention of the existing Chadacre ward. The Parish Meeting stated that it had particularly close links with the parish of Hartest. Stanstead Parish Council similarly opposed the proposal to include the parish in a modified Glemsford ward.

48 Cockfield Parish Council stated that it wanted to maintain its links with Thorpe Morieux parish. Thorpe Morieux Parish Council commented that it considered it would not be able to support the District Council's amended scheme. Milden Parish Meeting proposed retaining the existing Brett Vale ward, and expressed concern at the creation of large rural wards.

49 Boxford, Edwardstone and Groton parish councils proposed a scheme providing for a new two-member Glemsford ward, comprising Boxted, Glemsford, Hartest, Somerton and Stanstead parishes and a new single-member Cockfield & Lawshall ward, comprising Lawshall, Cockfield and Shimpling parishes. It broadly supported the District Council's proposed North Cosford ward, but proposed that the parish of Brettenham should also form part of the ward.

50 This area proved contentious throughout the early stages of the review. There was a lack of local consensus over proposals and the District Council and the Commission investigated a number of alternatives which would balance the need to seek electoral equality while reflecting the statutory criteria. However, we remained concerned about the high electoral inequalities which would persist under the Council's scheme.

51 As part of our draft recommendations we proposed extending the existing Chadacre ward to incorporate the parishes of Glemsford and Cockfield. This new three-member Chadacre ward would have an electoral variance of 10 per cent initially, 5 per cent in 2005. However we also outlined an alternative configuration, creating a two-member Chadacre ward, comprising the parishes of Glemsford, Stanstead, Boxted, Somerton and Hartest, which would have a variance of 8 per cent initially, 3 per cent by 2005, and a single-member Lawshall & Cockfield ward (comprising the parishes of Cockfield, Lawshall and Shimpling) which would have a variance of 14 per cent initially, 9 per cent by 2005. We proposed no change to Lavenham and Long Melford wards and adopted the District Council's proposed North Cosford and Brett Vale wards as part of our draft recommendations.

52 At Stage Three the District Council opposed our draft recommendations for the Chadacre/Cockfield area. It proposed that Councillor Hodge's first proposal (outlined below) be adopted but stated that if this was not possible his second alternative was preferred to our draft recommendations.

53 Councillor Hodge, member for North Cosford ward, put forward two alternative proposals for this area. His first 'community of interest' preference would provide for a two-member Glemsford ward consisting solely of Glemsford parish which would have an electoral variance of 21 per cent and a single-member Chadacre ward, consisting of Boxted, Hartest, Lawshall, Shimpling, Somerton and Stanstead parishes with an electoral variance of 14 per cent. He further proposed a single-member North Cosford ward, consisting of Brent Eleigh, Chelsworth, Cockfield, Kettlebaston, Monks Eleigh, Preston St Mary and Thorpe Morieux parishes, with an electoral variance of 10 per cent. The proposed single-member South Cosford ward would consist of Aldham, Elmsett, Kersey, Nedging-with-Naughton and Whatfield parishes and would have an electoral variance of 7 per cent. Finally, he proposed a single-member Boxford ward consisting of Boxford, Edwardstone, Groton, Lindsey and Milden parishes, which would have an electoral variance of 10 per cent. Under these proposals the wards of Long Melford and Brett Vale would be the same as under our draft recommendations. Councillor Hodge argued that these variances were acceptable in view of the 'exceptional circumstance' that exists in the north of the district.

He also outlined a second proposal for a two-member Glemsford ward containing Glemsford and Stanstead parishes which would have an electoral variance of 12 per cent; and a single-member Chadacre ward would then comprise Boxted, Hartest, Lawshall, Somerton and Shimpling parishes and would have an electoral variance of 4 per cent. Under both options the proposed Boxford, Brett Vale, Long Melford, North Cosford and South Cosford wards would be the same. Under these proposals the parishes of Milden and Lindsey would then form part of a modified Boxford ward and Kersey parish would then form part of a modified South Cosford ward.

54 Councillor Wood, member for Alton ward, opposed Councillor Hodge's proposals for the north of the district. Alpheton and Elmsett parish councils and Councillor Arthey, member for Brett Vale ward, supported our draft recommendations. Somerton Parish Council opposed our draft recommendations. Cockfield and Shimpling parish councils both endorsed Councillor Hodge's proposals.

55 Councillor Long, member for Chadacre ward, and Boxted Parish Meeting contended that we should give 'greater weighting to community of interest'. Councillor Long also proposed that Chadacre ward should remain unchanged. Suffolk County Council relayed the concerns of County Councillor Glead, member for Brett division, who argued that Cockfield parish was geographically separated from parishes in the Chadacre area by the A143. South Suffolk Conservative Association rejected our draft recommendations and expressed a preference for single-member wards. Stanstead Parish Council and a local resident objected to Glemsford being paired with smaller neighbouring rural parishes. The Suffolk Constabulary expressed concern that the proposed amendments to ward boundaries would adversely 'impact on the policing arrangements for the county'.

56 Cockfield Parish Council objected to our draft recommendations, submitting alternative proposals identical to Councillor Hodge's second alternative (mentioned above). These alternatives would place Cockfield parish in North Cosford ward along with Thorpe Morieux parish. This was supported by Tim Yeo, MP for South Suffolk. Boxted Parish Meeting, the parish councils of Boxford, Lawshall, Hartest, Shimpling, Cockfield Primary School Governing body and four local residents all expressed opposition to the placing of Cockfield and Thorpe Morieux parishes in different wards. Councillor Lazenby, member for Elmsett ward, supported our draft recommendations. Brettenham Parish Council supported our draft recommendations for Brett Vale ward but expressed sympathy for Thorpe Morieux parish being linked in an 'unreasonably large grouping'.

57 We have noted all the argumentation and evidence received at Stage Three. We received a number of submissions stating that Glemsford parish should continue to form a ward on its own. The surrounding parishes objected to being placed in a ward with Glemsford stating that the 'synergy' existing within the Chadacre parishes would be disturbed. They were also concerned that there might be a conflict of interest within a ward containing both distinct rural and urban communities.

58 We also received a number of comments concerning Cockfield parish and its links with Thorpe Morieux parish. Here again there has not been local consensus, with some respondents expressing support for placing Cockfield parish within a North Cosford ward and others supporting our draft recommendations.

59 Although a number of responses stated that there were exceptional circumstances in the north of the district, we received little evidence as to this. We have not been convinced by the argument that both councillors, in a two-member ward combining Glemsford and other rural parishes, would represent only the views of Glemsford residents at the expense of those in rural parishes. Local councillors are elected to represent all electors in their ward. The Commission's task is to ensure that electors' votes are worth the same amount, having regard to local circumstances. We do not consider that sufficient evidence has been received concerning these local circumstances to justify an electoral variance of 21 per cent.

60 In the light of the strong opposition to our draft recommendations and the evidence submitted at Stage Three, we have been persuaded that Councillor Hodge's second alternative provides a better balance between electoral equality and the statutory criteria. We are convinced by the evidence submitted with regard to the links between Cockfield and Thorpe Morieux parishes. We noted the responses of local residents that provided evidence of links between the Cockfield and Thorpe Morieux parishes, such as the use of public amenities and the contribution of residents to a local magazine. We consider these links would be reflected in Councillor Hodge's second option, which proposed both parishes being placed in North Cosford ward.

61 We are therefore modifying our draft recommendations for the north of the district and adopting Councillor Hodge's alternative proposals detailed above. To accommodate these modifications we have also had to move away from our draft recommendations with respect to Milden, Lindsey and Kersey parishes. To ensure good electoral equality we propose transferring Milden and Lindsey parishes to Boxford ward, and Kersey parish to South Cosford ward. We noted Boxford Parish Council stated that it would accept the inclusion of Milden and Lindsey parishes in Boxford ward if these parishes had no objection to the transfer. While we note the comments from the parish councils of Milden and Kersey, generally supporting our draft recommendations, we have had to look at this area as a whole and given further evidence now consider the alternative scheme a better balance between electoral equality and the statutory criteria.

62 Under these proposals the number of electors per councillor would be 3 per cent above the district average in Brett Vale ward (equal to the average in 2005), 6 per cent below the district average in Chadacre ward (4 per cent below in 2005), 9 per cent below the district average in Glemsford & Stanstead ward (12 per cent below in 2005), 2 per cent above the district average in Lavenham (2 per cent below in 2005), 3 per cent above the district average in Long Melford ward (4 per cent below in 2005) and 15 per cent above the district average in North Cosford ward (10 per cent above in 2005). Details of our recommendations for these wards can be found on Map 2.

Bildeston and Elmsett wards

63 The single-member wards of Bildeston and Elmsett lie in the east of the district. Bildeston ward comprises the parishes of Bildeston, Hitcham and Wattisham and has a councillor:elector ratio 13 per cent below the district average (15 per cent in 2005). Elmsett ward, comprising the parishes of Aldham, Elmsett, Nedging-with-Naughton, Semer and Whatfield, has a councillor:elector ratio 11 per cent below the district average (12 per cent in 2005).

64 At Stage One the District Council proposed that the parish of Brettenham, currently in North Cosford ward, should be included in an enlarged Bildeston ward, which would be renamed Brett Vale. The number of electors per councillor in the modified ward would be 3 per cent above the district average initially and equal to the average by 2005. Given the level of electoral equality within the existing Elmsett ward the District Council proposed that it should remain unmodified, though it did propose that the ward be renamed South Cosford.

65 Boxford, Edwardstone and Groton parish councils proposed two single-member wards; one comprising Hitcham, Bildeston, Nedging-with-Naughton and Wattisham parishes, and the other comprising Aldham, Elmsett, Kersey, Semer and Whatfield parishes.

66 While we were concerned about the levels of electoral equality which would remain under the Council's proposals, we were unable to find a viable alternative, and therefore adopted the District Council's proposals for Brett Vale and South Cosford wards as part of our draft recommendations.

67 During Stage Three the District Council supported our recommendations for this area. Brettenham Parish supported the draft recommendation that it form part of the new Brett Vale ward. Elmsett Parish Council expressed support for these proposals. Aldham, Nedging-with-Naughton and Semer parish councils supported our draft recommendations for South Cosford ward.

68 As mentioned above, the modifications to the northern wards has led to the need for adjustments to South Cosford ward. We therefore recommend additionally including Kersey parish in South Cosford ward. Although we note the support from Kersey Parish Council for our draft recommendations, given all the responses made during Stage Three, we have reconsidered our proposals for the district as a whole. In order to achieve an appropriate balance between achieving electoral equality and reflecting the statutory criteria, we are recommending alternative proposals for North Cosford ward which necessitate placing Kersey parish in a different ward to that proposed in our draft recommendations. We note, however, that in the Stage One proposals from the parish councils of Boxford, Edwardstone and Groton, the parish of Kersey would be included in a ward with the majority of the current Elmsett ward.

69 Given all the evidence received during Stage Three, we consider that including Kersey parish in the proposed South Cosford ward would achieve reasonable levels of electoral equality, reflect local community identities and would facilitate a good scheme throughout the district as a whole.

70 Under our final recommendations the councillor:elector ratio would be 3 per cent above the district average in Brett Vale ward (equal to the average by 2005) and 9 per cent above the district average in South Cosford ward (7 per cent above by 2005). Details of our proposals for these wards can be found on Map 2.

Boxford, Bures St Mary and Waldingfield wards

71 These three wards are located in the south-western part of the district. The existing single-member Boxford ward comprises the parishes of Boxford, Edwardstone and Groton and currently

has a councillor:elector ratio 5 per cent below the district average (7 per cent by 2005). Bures St Mary ward, which is also represented by one councillor, comprises the parishes of Bures St Mary, Little Cornard and Newton and has a councillor:elector ratio 11 per cent below the district average at present (15 per cent by 2005). The two-member Waldingfield ward, which comprises the parishes of Acton, Chilton, Great Waldingfield and Little Waldingfield has a councillor:elector ratio 1 per cent below the district average currently (7 per cent above by 2005).

72 At Stage One the District Council proposed no change for these wards. These recommendations were supported by Great Waldingfield parish council and the parish councils of Boxford, Edwardstone and Groton.

73 Given the local support for these proposals, we adopted them as part of our draft recommendations. Under a council size of 43, Boxford, Bures St Mary and Waldingfield wards would have councillor:elector ratios 3 per cent below, 9 per cent below and 1 per cent above the district average initially (5 per cent below, 13 per cent below and 9 per cent above by 2005).

74 During Stage Three the District Council supported our proposals. Boxford, Chilton and Groton parish councils all expressed support for the draft recommendations for this area. However, as mentioned above, Boxford Parish Council stated that it would not object to the inclusion of Milden and Lindsey parishes in Boxford ward, if the parish councils concerned were content. Councillor Arthey, member for Brett Vale ward, supported our draft recommendations and expressed concern at the ‘ripple effect’ of the changes proposed for North Cosford ward by the District Council. He also opposed separating Milden, Lindsey and Kersey parishes from parishes in the current Brett Vale ward.

75 Given the overall pattern of warding throughout the district, and in the light of our proposals for the north of the district as a whole, we recommend transferring Milden and Lindsey parishes from Brett Vale ward to Boxford ward. After looking at a number of alternatives for the north of the district, we consider that this option would facilitate the modifications in the north of the district and maintain an acceptable councillor:elector ratio in the Boxford ward of 10 per cent by 2005. These proposals for Boxford commanded the support of the District Council, Councillor Hodge, Tim Yeo MP and various other Stage Three respondents. In the light of the support expressed for the existing Bures St Mary and Waldingfield wards we propose endorsing them as part of our final recommendations.

76 The proposed Boxford, Bures St Mary and Waldingfield wards would have councillor:elector ratios 13 per cent above, 9 per cent below and 1 per cent above the district average initially (10 per cent above, 13 per cent below and 9 per cent above by 2005). Details of these proposed wards can be found on Map 2.

Sudbury (three wards)

77 Sudbury is the largest town in the district and lies on its western border. It is currently divided into three two-member wards: Sudbury East, Sudbury North and Sudbury South. The current councillor:elector ratio in these three wards is 10 per cent below, 11 per cent above and 3 per cent above the district average respectively (8 per cent below, 13 per cent above and 1 per cent below by 2005).

78 At Stage One the District Council proposed minor modifications to the existing wards to take account of the proposed increase in the electorate by 2005, as well as the recent modifications resulting from a parish boundary review. Given the apparent consensus expressed on these proposals and the resulting levels of electoral equality, we adopted the District Council's proposals for Sudbury as part of our draft recommendations.

79 At Stage Three the District Council accepted our draft recommendations for Sudbury. We did not receive any other comments concerning these wards. We therefore recommend that our draft recommendations be endorsed as final. The resulting councillor:elector ratio would be 2 per cent above the district average in Sudbury East (3 per cent above in 2005), 1 per cent above the district average in Sudbury North (5 per cent above in 2005) and 8 per cent above the district average in Sudbury South (5 per cent above by 2005). Details of the proposals for these wards can be found on the large map inserted at the back of this report.

Great Cornard (two wards)

80 The parish of Great Cornard lies to the south of Sudbury and is currently represented by two two-member wards: Great Cornard North and Great Cornard South. The number of electors per councillor in the two wards is currently 9 per cent and 1 per cent below the district average respectively (9 per cent below and 2 per cent above by 2005).

81 At Stage One the District Council proposed that the parish should continue to be represented by four district councillors, but that the boundary between the two wards should be modified to provide improved levels of electoral equality, in accordance with a scheme proposed by Great Cornard Parish Council. The modified wards of Great Cornard North and Great Cornard South would both have councillor:elector ratios 3 per cent below the district average (2 per cent below and 1 per cent below by 2005). Given the local support for the District Council's proposals we adopted them as part of our draft recommendations.

82 During Stage Three the District Council supported our draft recommendations for Great Cornard. We received no further comments for this area. Given that our draft recommendations were based on a locally-generated scheme which would provide for reasonable levels of electoral equality, we are endorsing our draft recommendations for Great Cornard ward as final. Details of our recommendations for these wards can be found on the large map inserted at the back of this report.

Capel & Wenham, Leavenheath, Nayland, Polstead & Layham and West Samford wards

83 The existing wards of Capel & Wenham, Leavenheath, Nayland, Polstead & Layham and West Samford lie in the south-east of the district. Capel & Wenham ward currently returns two councillors, while the other four wards each return a single councillor. Capel & Wenham ward, comprising the parishes of Capel St Mary, Wenham Magna and Wenham Parva, currently has an electoral variance of 18 per cent (22 per cent by 2005). Leavenheath ward, comprising the parishes of Assington, Leavenheath and Stoke-by-Nayland has an electoral variance of 29 per cent (24 per cent by 2005). Nayland ward, comprising the parish of Nayland-with-Wissington, has an

electoral variance of 38 per cent (42 per cent by 2005). Polstead & Layham ward, comprising the parishes of the same names, has an electoral variance of 27 per cent (30 per cent by 2005). West Samford ward, comprising the parishes of Higham, Holton St Mary, Stratford St Mary and Shelley, has an electoral variance of 17 per cent (19 per cent by 2005).

84 At Stage One the District Council proposed that Leavenheath ward should be modified to comprise only the parishes of Assington and Leavenheath. The proposed Leavenheath ward would have a councillor:elector ratio 5 per cent below the district average initially (8 per cent by 2005). The District Council proposed that the parish of Stoke-by-Nayland, currently in Leavenheath ward, should form part of an enlarged Nayland ward with the parishes of Higham and Nayland-with-Wissington, contending that they have good and close geographical links. The proposed Nayland ward would have a councillor:elector ratio 7 per cent above the district average initially (1 per cent by 2005). These proposals were developed in the light of comments which the District Council received during its initial consultation.

85 The District Council also proposed that the parishes of Raydon and Shelley, currently in West Samford ward, be added to the existing Polstead & Layham ward to form a new Lower Brett ward. Finally in this area it proposed that the existing Capel & Wenham ward should be expanded to include the parishes of Holton St Mary and Stratford St Mary.

86 We received a number of submissions commenting on the District Council's initial consultation scheme which it amended, in the light of local comments, before submitting a scheme to the Commission.

87 We broadly adopted the District Council's proposals for these wards, noting the wide consultation process that had been undertaken. However, we recommended as part of our draft recommendations one modification, that Higham parish should form part of the proposed Mid Samford ward, therefore altering the boundary between Mid Samford and Nayland wards.

88 At Stage Three the District Council proposed that Higham parish be included in Lower Brett ward. Our recommendations for Higham parish were supported by the South Suffolk Conservative Association. Assington Parish Council supported our draft recommendations, particularly for Leavenheath ward. Nayland-with-Wissington Parish Council supported the draft recommendations for Nayland ward and the District Council's proposals to place Higham parish in Mid Samford ward. Stoke-by-Nayland Parish Council supported proposals placing the parish of Higham within Mid Samford ward. Higham Parish Meeting opposed the draft recommendation including Higham parish in Mid Samford ward, arguing that Higham parish should be grouped with villages 'similar in complexion' in Lower Brett ward. Layham Parish Council proposed that the parishes of Higham, Layham, Polstead, Raydon and Shelley should form a Lower Brett ward for reasons of community identity. Polstead Parish Council stated they had no objection to the draft recommendations placing the parishes of Polstead, Layham, Shelly, Raydon and Higham in the Lower Brett ward. Shelley Parish Meeting supported the proposal to include Shelley parish in Lower Brett ward with the parishes of Polstead, Raydon and Layham.

89 Capel St Mary Parish Council proposed that the parishes of Capel St Mary and 'the Wenhams' be placed in a district ward with Bentley parish for reasons of community identity. It also opposed linking Capel St Mary, Little Wenham, Great Wenham, Holton St Mary and

Stratford St Mary parishes in a single ward for the same reason. Stratford St Mary Parish Council opposed the draft recommendations linking the parishes of Stratford St Mary and Capel St Mary, and argued that Stratford St Mary parish should be included in a ward with the parishes of East Bergholt and Holton St Mary for reasons of community identity. Wenham Magna Parish Meeting declared no objections to our draft recommendations.

90 We noted the support the District Council had received from the both Higham Parish Meeting and Stratford St Mary Parish Council for its proposals. However, it has not been possible to accommodate both proposals and retain reasonable electoral equality. In the light of the higher priority accorded to the proposals to include Higham parish in Lower Brett ward by the District Council and the fact that this relocation would continue to provide acceptable levels of electoral equality in the Nayland and Lower Brett wards, we propose modifying our recommendations to include Higham parish in the Lower Brett ward. Such a proposal would not adversely disrupt the district-wide pattern of our recommendations. However, in order to retain a balance between electoral equality and the statutory criteria in this area we propose that Stratford St Mary parish remain within Mid Samford ward. We do not propose any further modifications to our draft recommendations for this area.

91 Under our final recommendations, the councillor:elector ratios in the proposed wards would be 5 per cent below the district average in Leavenheath ward (8 per cent below by 2005), 10 per cent above the district average in Lower Brett ward (5 per cent above by 2005) and 9 per cent above the district average in Mid Samford ward (4 per cent above by 2005). The proposed Nayland ward would have a councillor:elector ratio equal to the district average initially (5 per cent below by 2005). Details of our proposals for these wards can be found on Map 2.

Hadleigh ward

92 Hadleigh is a historic town and the administrative centre of the district. It is currently represented by three district councillors. Presently, the ward is substantially under-represented, with each councillor representing 21 per cent more electors than the district average. This level of electoral inequality is projected to deteriorate over the next five years, with each councillor forecast to represent 27 per cent more electors than the district average by 2005.

93 At Stage One the District Council proposed that the boundaries of Hadleigh ward should remain unchanged but, to improve electoral equality, proposed that the number of councillors for the ward be increased from three to four. The Conservative Group contended that the District Council's proposals would dilute the accountability of councillors to the electorate and proposed that Hadleigh should be divided into two wards, each returning two district councillors. Hadleigh Town Council supported the proposal that the whole town should be represented by four district councillors. However, it argued that if the town were to be warded as part of this review, the proposed wards should be named Hadleigh North and Hadleigh South.

94 As outlined in our *Guidance*, we consider that the number of councillors to be returned from each ward should not exceed three, other than in exceptional circumstances. We consider that four-member wards are not beneficial for the promotion of accountability and effective local democracy, and were not persuaded that there are exceptional circumstances to warrant a four-

member ward in this instance. After careful consideration we adopted an initial scheme that the District Council had proposed for two two-member wards, as part of our draft recommendations.

95 At Stage Three we received submissions from Hadleigh Town Council, the Hadleigh Society and County Councillor Grutchfield, member for Hadleigh division, opposing our proposals for warding the town. The District Council, however, accepted our proposals to ward the town. Given the size of Hadleigh, it is entitled to four councillors and we have not been persuaded by the submissions received that there are exceptional circumstances relating to Hadleigh which would justify recommending a four-member ward for the area. In fact we note the support of a number of respondents and the comparisons made between Hadleigh and other towns in Babergh. We therefore endorse our draft recommendation that Hadleigh be divided into two two-member wards, broadly on a north/south axis, as final. We propose that the two new wards be named Hadleigh North and Hadleigh South, as suggested by Hadleigh Town Council at Stage One.

96 The number of electors per councillor in the proposed wards would be 11 per cent below the district average in Hadleigh North ward (2 per cent below by 2005) and 2 per cent below the district average in Hadleigh South ward (4 per cent below by 2005). Details of our recommendations for these wards can be found on Map A2 in Appendix A.

Brookvale, Copdock and Dodnash wards

97 The existing Brookvale, Copdock and Dodnash wards lie in the east of the district, south of Ipswich. At present the single-member Brookvale ward, comprising the parishes of Burstall, Chattisham, Hintlesham and Sproughton, has a councillor:elector ratio 18 per cent above the district average (14 per cent by 2005). The single-member Copdock ward, comprising the parishes of Copdock & Washbrook, Belstead, Pinewood and Wherstead, has a councillor:elector ratio 152 per cent above the district average (198 per cent by 2005). The two-member Dodnash ward, which comprises the parishes of Bentley and East Bergholt, has a councillor:elector ratio 9 per cent below the district average (13 per cent by 2005).

98 At Stage One the District Council proposed that Pinewood parish should form its own two-member Pinewood ward, a suggestion that was supported by the Parish Council. The District Council proposed a new single-member Belstead Brook ward comprising the parishes of Copdock & Washbrook, Belstead and Wherstead from the existing Copdock ward and Freston parish from the existing Berners ward. The proposed ward would have a councillor:elector ratio 6 per cent below the district average initially (10 per cent by 2005).

99 The District Council also proposed that the existing Brookvale and Dodnash wards be retained. Boxford, Edwardstone and Groton parish councils supported the District Council's proposal for wards in their area.

100 While we adopted the District Council's new two-member Pinewood ward comprising the parish of the same name, we had reservations about its proposed Belstead Brook and Brookvale wards. The councillor:elector ratios in the proposed neighbouring single-member wards would be 6 per cent below the district average (10 per cent by 2005) and 21 per cent above the average (16 per cent by 2005) respectively. We did not consider there to be sufficient grounds to support

an electoral variance of 16 per cent in this instance, particularly when an alternative was available. We, therefore, proposed that the two single-member Belstead Brook and Brookvale wards proposed by the District Council be combined to form a new two-member Brook ward. The proposed ward would have an electoral variance of 8 per cent initially (3 per cent by 2005).

101 During Stage Three the District Council requested that we reconsider its proposal for single-member Brookvale and Belstead Brook wards. Alternatively it proposed Freston parish be included in Berners ward. The South Suffolk Conservative Association stated its preference for single-member wards in rural wards. Burstall Parish Council proposed that Burstall parish remain part of an unmodified Brookvale ward. Freston Parish Council expressed support for the District Council's proposals. Chattisham & Hintlesham Parish Council opposed the proposed Brook ward for reasons of community identity. Councillor Pollard, member for Belstead Brook division, expressed opposition to the multi-member ward arrangements affecting her area. Copdock & Washbrook Parish Council proposed single-member Brookvale and Belstead Brook wards and opposed a two-member Brook ward for reasons of community identities. Pinewood Parish Council supported the proposed two-member ward.

102 We considered all the Stage Three responses regarding warding arrangements in this area. However, we found no real evidence in support of assertions that a two-member Brook ward would not provide convenient and effective local government. Nevertheless, placing Freston parish in Berners ward, as proposed by the District Council and Freston Parish Council, would improve electoral equality. We, therefore, propose amending Berners ward to include Freston parish (discussed below) but are generally endorsing our draft recommendation for a two-member Brook ward as final. We also proposed endorsing our draft recommendations for a new two-member Pinewood ward as final. With respect to the remainder of this area we are also endorsing our draft recommendation to retain the existing Dodnash ward as final.

103 We consider that these recommendations would best reflect local community identities, retain the overall integrity of the scheme and give reasonable levels of electoral equality.

104 The number of electors per councillor would be 4 per cent above the district average in Brook ward (equal to the average by 2005), 7 per cent below the district average in Dodnash ward (11 per cent below by 2005) and 5 per cent below the district average in Pinewood ward (11 per cent above by 2005). Details of our proposals for these wards can be found on Map 2.

Alton, Berners, Brantham, Holbrook and Shotley wards

105 These five wards are each represented by a single councillor and are located in the south-east of the district. The existing Alton ward, comprising the parishes of Stutton and Tattingstone, has a councillor:elector ratio 33 per cent below the district average, both currently and in 2005. Berners ward, comprising the parishes of Chelmondiston, Freston and Woolverston, has a councillor:elector ratio 24 per cent below the district average (29 per cent by 2005). Brantham ward, which comprises the parish of Brantham, has a councillor:elector ratio 25 per cent above the district average at present (19 per cent by 2005). Holbrook ward, comprising the parishes of Harkstead and Holbrook, has a councillor:elector ratio 5 per cent above the district average currently (2 per cent in 2005). Shotley ward, comprising the parishes of Arwarton and Shotley,

has a councillor:elector ratio 18 per cent above the district average at present (28 per cent by 2005).

106 During Stage One the District Council proposed that Brantham and Alton wards should be combined in a two-member Alton ward and that the parishes of Woolverstone and Chelmondiston, currently in Berners ward, should form part of a two-member Berners ward with the parishes of Arwarton and Shotley, currently in Shotley ward. Freston parish, currently in Berners ward, should form part of the proposed two-member Brook ward. The District Council also proposed no change to Holbrook ward. Brantham Parish Council opposed the District Council's proposal and contended that the existing Brantham ward should be retained. Boxford, Edwardstone and Groton parish councils supported the District Council's proposals for this area. Given the improved levels of electoral equality achieved we adopted the District Council's proposals as part of our draft recommendations.

107 At Stage Three the District Council opposed the draft recommendations for Brook ward. It requested that its original proposal for single-member Brook Vale and Belstead Brook wards be reconsidered. However, it stated that if the Commission continued to recommend a two-member Brook Vale ward then Freston parish should be included in Berners ward. Freston Parish Council supported the District Council's proposals. Holbrook Parish Council stated its support for our draft recommendations.

108 Given the representations received during Stage Three, we have been persuaded that to include Freston parish in Berners ward would improve electoral equality while continuing to reflect the statutory criteria, and therefore suggest it form part of our final recommendations. Additionally, given the support for our proposed Alton and Holbrook wards we confirm them as final.

109 The number of electors per councillor in the proposed wards would be 1 per cent below the district average in the Alton ward (5 per cent below by 2005), 1 per cent below the district average in the Berners ward (2 per cent above by 2005) and 7 per cent above in the Holbrook ward (4 per cent above by 2005). Details of our proposals for these wards can be found on Map 2.

Electoral Cycle

110 At Stage One we received no proposals in relation to the electoral cycle of the district. Accordingly, we made no recommendation for change to the present system of whole-council elections every four years.

111 At Stage Three no further comments were received to the contrary, and we confirm our draft recommendation should be endorsed as final.

Conclusions

112 Having considered carefully all the representations and evidence received in response to our consultation report, we have decided substantially to endorse our draft recommendations, subject to the following amendments:

- we propose a new two-member Glemsford & Stanstead ward comprising the parishes of those names;
- we propose that North Cosford ward should comprise the parishes of Brent Eleigh, Chelsworth, Kettlebaston, Lindsey, Milden, Monks Eleigh, Thorpe Morieux and Preston St Mary;
- we propose that the parishes of Lindsey and Milden form part of the modified Boxford ward;
- we propose that Kersey parish should form part of South Cosford ward;
- we propose that the parish of Higham should form part of Lower Brett ward rather than Mid Samford ward;
- we propose that Freston parish should form part of Berners ward rather than Brook ward;

113 We conclude that, in Babergh:

- there should be an increase in council size from 42 to 43;
- there should be 27 wards, three fewer than at present;
- the boundaries of 24 of the existing wards should be modified;
- the Council should continue to hold whole-council elections every four years.

114 Figure 4 shows the impact of our final recommendations on electoral equality, comparing them with the current arrangements, based on 2000 and 2005 electorate figures.

Figure 4: Comparison of Current and Recommended Electoral Arrangements

	2000 electorate		2005 forecast electorate	
	Current arrangements	Final recommendations	Current arrangements	Final recommendations
Number of councillors	42	43	42	43
Number of wards	30	27	30	27
Average number of electors per councillor	1,574	1,538	1,685	1,646
Number of wards with a variance more than 10 per cent from the average	20	3	21	4
Number of wards with a variance more than 20 per cent from the average	9	0	12	0

115 As Figure 4 shows, our recommendations would result in a reduction in the number of wards with an electoral variance of more than 10 per cent from 20 to three with no wards varying by more than 20 per cent from the district average. There would be a general continuation in these levels of electoral equality, with only four wards, varying by than 10 per cent from the average for the district by 2005, and none would vary by more than 13 per cent. We conclude that our recommendations would best meet the need for electoral equality, having regard to the statutory criteria.

Final Recommendation
 Babergh District Council should comprise 43 councillors serving 27 wards, as detailed and named in Figures 1 and 2, and illustrated on Map 2 and in Appendix A including the large map inside the back cover. The Council should continue to hold whole-council elections every four years.

Parish and Town Council Electoral Arrangements

116 In undertaking reviews of electoral arrangements we are required to comply as far as possible with the provisions set out in Schedule 11 to the 1972 Local Government Act. The Schedule provides that if a parish is to be divided between different district wards it must also be divided into parish wards, so that each parish ward lies wholly within a single ward of the district. Accordingly, we propose consequential warding arrangements for the parishes of Great Cornard, Sudbury and Hadleigh to reflect the proposed district wards.

117 The parish of Great Cornard is currently served by 14 councillors representing two wards, Great Cornard North and Great Cornard South, each returning seven councillors. The District Council proposed modifying the boundary between the two district wards and making consequential modifications to parish ward boundaries. We adopted the District Council's proposals for district warding in Great Cornard as part of our draft recommendations and consequently proposed that the parish wards should be modified to reflect the proposed district wards. During Stage Three, the District Council and Great Cornard Parish Council supported these proposals. We therefore propose that Great Cornard parish should continue to be represented by 14 parish councillors returned from two parish wards: Great Cornard North, represented by seven councillors, and Great Cornard South, represented by seven councillors.

Final Recommendation
Great Cornard Parish Council should comprise 14 councillors, as at present, representing two wards: Great Cornard North (returning seven councillors) and Great Cornard South (returning seven councillors). The parish ward boundaries should reflect the proposed district ward boundaries in the area, as illustrated and named on the large map inserted at the back of the report.

118 The parish of Sudbury is currently served by 16 councillors representing three wards: Sudbury East (returning five councillors), Sudbury North (returning six councillors) and Sudbury South (returning five councillors). The District Council proposed amendments to the current district wards, which we adopted as part of our draft recommendations. During Stage Three the District Council supported our draft recommendations for Sudbury. No further representations were received. We therefore confirm our draft recommendation as final. We propose that Sudbury should continue to be represented by 16 town councillors, serving three wards: Sudbury East (returning five councillors), Sudbury North (returning six councillors) and Sudbury South (returning five councillors).

Final Recommendation
Sudbury Town Council should comprise 16 councillors, as at present, representing three wards: Sudbury East (returning five councillors), Sudbury North (returning six councillors) and Sudbury South (returning five councillors). The parish ward boundaries should reflect the proposed district ward boundaries in the area, as illustrated and named on the large map at the back of the report.

119 Hadleigh is currently served by 15 councillors and is unwarded. At Stage One the District Council did not propose warding the town; however, as part of our draft recommendations we proposed warding Hadleigh for the first time, to form two two-member district wards. Although Hadleigh Town Council opposed the warding of the town at district and parish level, it stated that, in the event of the town being warded, these wards should be named Hadleigh North and Hadleigh South. As a consequence of our final recommendations at district level, we are also

reconfirming our draft recommendations at parish level as final. We therefore recommend that Hadleigh should be represented by two parish wards: Hadleigh North, returning eight councillors, and Hadleigh South, returning seven councillors.

Final Recommendation

Hadleigh Town Council should comprise 15 councillors, as at present, representing two wards: Hadleigh North (returning eight councillors) and Hadleigh South (returning seven councillors). The parish ward boundaries should reflect the proposed district ward boundaries in the area, as illustrated and named on Map A2 in Appendix A.

120 We are not proposing any change to the electoral cycle of the parish and town councils in the district.

Final Recommendation

For parish and town councils, whole-council elections should continue to take place every four years, on the same cycle as that of the District Council.

Map 2: The Commission's Final Recommendations for Babergh

6 NEXT STEPS

121 Having completed our review of electoral arrangements in Babergh and submitted our final recommendations to the Secretary of State, we have fulfilled our statutory obligation under the Local Government Act 1992.

122 It now falls to the Secretary of State to decide whether to give effect to our recommendations, with or without modification, and to implement them by means of an Order. Such an Order will not be made before 6 August 2001.

123 All further correspondence concerning our recommendations and the matters discussed in this report should be addressed to:

The Secretary of State
Department of the Environment, Transport and the Regions
Local Government Sponsorship Division
Eland House
Bressenden Place
London SW1E 5DU

APPENDIX A

Final Recommendations for Babergh: Detailed Mapping

The following maps illustrate the Commission's proposed ward boundaries for the Babergh area.

Map A1 illustrates, in outline form, the proposed ward boundaries within the district and indicates the areas which are shown in more detail in Map A2 and the large map at the back of the report

Map A2 illustrates the proposed warding of Hadleigh parish.

The **large map** inserted in the back of the report illustrates the proposed warding arrangements for Sudbury and Great Cornard.

Map A1: Final Recommendations for Babergh: Key Map

Map A2: Proposed warding of Hadleigh parish

APPENDIX B

Draft Recommendations for Babergh

Our final recommendations, detailed in Figures 1 and 2, differ from those we put forward as draft recommendations in respect of wards, where our draft proposals are set out below.

Figure B1: The Commission's Draft Recommendations: Constituent Areas

Ward name	Constituent areas
Berners	Berners ward (part – the parishes of Chelmondiston and Woolverstone); Shotley ward (the parishes of Arwarton and Shotley)
Boxford	<i>Unchanged</i> (the parishes of Boxford, Edwardstone and Groton)
Brook	Berners ward (part – Freston parish); Brookvale ward (the parishes of Burstall, Chattisham, Hintlesham and Sproughton); Copdock ward (part – the parishes of Belstead, Copdock & Washbrook and Wherstead)
Chadacre	Chadacre ward (the parishes of Boxted, Hartest, Lawshall, Shimpling, Somerton and Stanstead); Glemsford ward (Glemsford parish); North Cosford ward (part – Cockfield parish)
Lower Brett	Polstead & Layham ward (the parishes of Polstead and Layham); West Samford ward (part – the parishes of Raydon and Shelley)
Mid Samford	Capel & Wenham ward (the parishes of Capel St Mary, Wenham Magna and Wenham Parva); West Samford ward (part – the parishes of Higham, Holton St Mary and Stratford St Mary)
North Cosford	Brett Vale ward (the parishes of Brent Eleigh, Chelsworth, Kersey, Kettlebaston, Lindsey, Milden and Monks Eleigh); North Cosford ward (part – the parishes of Thorpe Morieux and Preston St Mary)
South Cosford	Elmsett ward (the parishes of Aldham, Elmsett, Nedging-with-Naughton, Semer and Whatfield)

Figure B2: The Commission's Draft Recommendations: Number of Councillors and Electors by Ward

Ward name	Number of councillors	Electorate (2000)	Number of electors per councillor	Variance from average %	Electorate (2005)	Number of electors per councillor	Variance from average %
Berners	2	2,952	1,476	-4	3,250	1,625	-1
Boxford	1	1,498	1,498	-3	1,571	1,571	-5
Brook	2	3,307	1,654	8	3,397	1,699	3
Chadacre	3	5,068	1,689	10	5,181	1,727	5
Lower Brett	1	1,579	1,579	3	1,622	1,622	-1
Mid Samford	2	3,474	1,737	13	3,535	1,768	7
North Cosford	1	1,584	1,584	3	1,614	1,614	-2
South Cosford	1	1,406	1,406	-9	1,486	1,486	-10

Source: Electorate figures are based on information provided by Babergh District Council.

Note: The 'variance from average' column shows by how far, in percentage terms, the number of electors per councillor varies from the average for the district. The minus symbol (-) denotes a lower than average number of electors. Figures have been rounded to the nearest whole number.

APPENDIX C

Code of Practice on Written Consultation

The Cabinet Office's November 2000 *Code of Practice on Written Consultation*, www.cabinet-office.gov.uk/servicefirst/index/consultation.htm, requires all Government Departments and Agencies to adhere to certain criteria, set out below, on the conduct of public consultations. Non-Departmental Public Bodies, such as the Local Government Commission, are encouraged to follow the Code.

The Code of Practice applies to consultation documents published after 1 January 2001, which should reproduce the criteria, give explanations of any departures, and confirm that the criteria have otherwise been followed.

Table C1: Commission compliance with Code criteria

Criteria	Compliance/departure
Timing of consultation should be built into the planning process for a policy (including legislation) or service from the start, so that it has the best prospect of improving the proposals concerned, and so that sufficient time is left for it at each stage	The Commission complies with this requirement
It should be clear who is being consulted, about what questions, in what timescale and for what purpose	The Commission complies with this requirement
A consultation document should be as simple and concise as possible. It should include a summary, in two pages at most, of the main questions it seeks views on. It should make it as easy as possible for readers to respond, make contact or complain	The Commission complies with this requirement
Documents should be made widely available, with the fullest use of electronic means (though not to the exclusion of others), and effectively drawn to the attention of all interested groups and individuals	The Commission complies with this requirement
Sufficient time should be allowed for considered responses from all groups with an interest. Twelve weeks should be the standard minimum period for a consultation	The Commission consults on draft recommendations for a minimum of eight weeks, but may extend the period if consultations take place over holiday periods
Responses should be carefully and open-mindedly analysed, and the results made widely available, with an account of the views expressed, and reasons for decisions finally taken	The Commission complies with this requirement
Departments should monitor and evaluate consultations, designating a consultation coordinator who will ensure the lessons are disseminated	The Commission complies with this requirement