

# Essex County Council Boundary Commission Submission & Proposal

Thank you for taking the time to consider my submission. I hope that you will adopt one of my two proposals, preferably the second. Having only seen Essex County Council's (ECC) submission, I will first address their recommendation to you and then will provide my alternative suggestions which I believe do a better job of meeting the statutory criteria for boundary reviews.

- [REDACTED], Canvey West resident

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## Overview and Response to ECC's Submission

### ECC's Proposal To Reduce Castle Point's Councillors By One

1. ECC's proposal to reduce Castle Point's number of councillors is unworkable and breaches the requirement for electoral equality. Even a theoretically perfect four-way split of Castle Point's electors (or divisions with a district magnitude greater than 1) would lead to each councillor representing 18,164 electors, which is 15% above the Essex average and is too great a variance. As a result, I hope you dismiss ECC's suggestion of removing a councillor from Castle Point out of hand as being inappropriate and unworkable. This suggestion seemed very out of place in their submission, as after having lamented the 'increasing workloads,' complaining of the previous reduction in councillors, and calling for 'better balancing the electoral balance of divisions,' they arbitrarily seem to have decided that none of that applies to Castle Point but does apply to every other part of Essex. They gave no justification for an increase to 77 members that does not also apply to an increase to 78 (or more) members. Consequently, I will spend the rest of this submission seeking to persuade you that ECC's suggestion is unacceptable and that my alternative suggestions better meet your requirements for boundary reviews.

### Brief Proposal Overview

2. I propose that we retain 5 councillors for Castle Point (2 for Canvey Island in Canvey West and Canvey East, 3 for 'mainland' Castle Point for Benfleet, Hadleigh, and Thundersley) and adjust the current boundaries to ensure that electoral equality is maintained. This would mean that rather than ECC's suggestion for a net increase of two councillors for Essex, there would be three. I have no objections to under-represented areas in Essex getting additional councillors and for over-represented areas to see their boundaries adjusted to ensure electoral equality and good community representation. It is certainly possible for Castle Point to be within the 10% variance limit for good electoral equality with 5 councillors, and I would also recommend that this be strengthened further by transferring Bowers Gifford and North Benfleet from Pitsea and uniting it with South Benfleet. Pitsea currently has a relatively higher average number of electors than the Essex average, so this would bring them closer to the ideal number for electoral equality too. It should also be noted that Bowers Gifford and North Benfleet is a geographically distinct and isolated area surrounded by green belt, and it would remain distinctive regardless of whether it stayed with Pitsea or joined Benfleet. Furthermore, the Boundary Commission is also currently proposing that this area be transferred to Castle Point for Parliamentary elections, so this would follow an existing and accepted set of plans for this area to be more aligned with South Benfleet for electoral purposes.

Please see the next page for the borough-level data regarding the prior points.

# Castle Point

Status Quo: Average Electorate Per Cllr:	16,444
ECC Plan (+2 [net] ECC Cllrs): Average Electorate Per Cllr:	16,017
SQ Plan (+3 ECC Cllrs): Average Electorate Per Cllr:	15,812

Status Quo			
	2029 Electorate	Electorate : Cllr	Variance
Canvey Combined:	30,522	15,261	-7%
Mainland Combined:	42,134	14,045	-15%
Castle Point Combined	72,656	14,531	-9%

ECC Plan to reduce Castle Point by 1 Cllr, and increase the rest of ECC by 3				
	Scenario: Canvey 2 Cllr, Mainland 2		Scenario: Canvey 1 Cllr, Mainland 3	
	2029 Electorate	Variance	2029 Electorate	Variance
Canvey Combined Electorate : Cllr	15,261	-5%	30,522	91%
Mainland Combined Electorate : Cllr	21,067	32%	14,045	-12%
Castle Point Combined Electorate : Cllr	18,164 electors per cllr		Variance: +15%	

## ECC's Flawed Population Argument

- It must be noted that a major flaw with ECC's proposal is that they have assumed that there will be zero growth in population from housing in Castle Point but have allowed this consideration for every other borough/district. In ECC's table below, they had expressly acknowledged 'no housing factored in' for Castle Point and have unjustly used that figure as the basis for cutting Castle Point's representation. Please be aware that Castle Point's new administration is due to have a new Local Plan in place to determine its future housing development by 2025, which may mean that no changes need to be made at all to our existing divisions. Even in the hypothetical circumstance where a Local Plan was not in place by that date, then there is a strong likelihood that the government would intervene and immediately impose their own plan instead. If such a circumstance were not to occur, developers would make (and already are making) applications and submitting appeals to build across Castle Point. Consequently, I hope I have demonstrated that due to the fact that Castle Point will certainly have housing development in the future, our voters should not be punished with unfair levels of electoral inequality by cutting our councillors.

District	2020 Electorate	2021 Electorate	2022 Electorate	2029 Electorate Forecast	2029 Electorate Forecast - with Housing	Additional Electorate from Housing	2029 Forecast V 2022 Electorate	2029 Forecast incl Housing V 2022 Electorate	Comments
Basildon	141,187	140,143	138,589	149,214	151,546	4,738	7.67%	9.35%	Basildon's method variant
Braintree	112,486	111,793	115,193	120,317	126,174	10,249	4.45%	9.53%	Suggest keep forecast
Brentwood	60,245	59,685	59,678	64,063	67,903	6,791	7.35%	13.78%	Follows Brentwood methodology
Castle Point	69,913	69,666	69,321	72,656	72,656	-	4.81%	4.81%	No Housing factored in 2028/9 not factored in - as combined in 5 year view
Chelmsford	134,668	133,579	131,721	141,088	144,788	5,335	7.11%	9.92%	Suggest keep forecast
Colchester	139,304	138,116	136,237	147,865	149,857	9,350	8.54%	10.00%	Suggest keep forecast
Epping Forest	101,311	99,221	98,308	107,641	108,261	3,844	9.49%	10.12%	Suggest keep forecast
Harlow	63,747	63,288	63,697	68,099	79,648	5,654	6.91%	25.04%	Forecast high due to high level of housing planned.
Maldon	51,301	51,083	50,704	53,379	58,023	6,943	5.28%	14.44%	Forecast high due to high level of housing planned.
Rochford	67,643	67,805	67,607	71,072	72,879	3,192	5.13%	7.80%	Suggest keep forecast
Tendring	114,629	116,853	116,302	123,284	127,929	7,871	6.00%	10.00%	Suggest keep forecast
Uttlesford	69,102	68,550	69,488	76,010	78,468	5,692	9.39%	12.92%	Forecast high due to high level of housing planned.
<b>Essex Total</b>	<b>1,125,536</b>	<b>1,119,782</b>	<b>1,116,845</b>	<b>1,194,688</b>	<b>1,238,133</b>	<b>69,659</b>			

## My Proposals Contrasted With ECC's

4. My two proposals for the future wards of Castle Point are on the next few pages, and these require minimal changes from the Commission compared to the status quo. In contrast, ECC's proposal would require far more drastic changes which would have major implications for the statutory requirement of reflecting community identities.
5. Please note that I do not recommend any amendment to Canvey Island's divisions at all. Both Canvey divisions already have good electoral equality, and any move to take part of Canvey and add it to a mainland division would not be compliant with the statutory requirement for representing the community identity of residents. Such a division would also require breaking up multiple polling districts to make it viable.
6. All of my data for the following proposals (as well as the page 2 data) are available via. an Excel document which I will also upload to the consultation page.
7. Below is a table with a borough-level overview of my two proposals, which I hope you will compare to page 2's overview of ECC's proposal.

SQ Proposal 1 to increase ECC by 3, so Castle Point Retains its 5 seats, Canvey: 2 Mainland: 3		
	2029 Electorate	Variance
Canvey Combined Electorate : Cllr	15,261	-3%
Mainland Combined Electorate : Cllr	14,045	-11%
Castle Point Combined Electorate : Cllr	14,531	-8%

SQ Proposal 2: Variant of proposal 1 adding North Benfleet & Bowers Gifford to Mainland		
	2029 Electorate	Variance
Canvey Combined Electorate : Cllr	15,261	-3%
Mainland Combined Electorate : Cllr	15,778	0%
Castle Point Combined Electorate : Cllr	15,519	-2%

## Proposal 1: Status Quo With Adjustments to Boundaries

8. My first proposal would see the [new borough wards](#) of Castle Point used to retain 5 County Councillors without seeking to add any areas outside of the borough. The Boundary Commission would need to adjust the boundaries around the Tarpots area and near Kiln Road to adjust Thundersley's current projected excessive variance. As the data on page 5 shows, this would leave the mainland of Castle Point almost at the 10% variance limit, and in theory each of the three divisions could have 10.33% variance below the average then after rounding it would place the mainland within the limit of good electoral equality.
9. If the Commission were so inclined, it could be argued that as Castle Point's overall electoral equality is within the variance limit, then a slight deficiency in one of its 5 divisions may be justified. Otherwise, if the Commission accepts that Castle Point will have housing built in the 2025 Local Plan then that would justify them leaving certain divisions in the 10-20% variance limit.
10. I must reiterate that I do not believe it would be compliant with the statutory requirement for reflecting community identity for the Commission to annex pieces of Canvey Island to a Benfleet division in order to make the numbers appear to work more conveniently. This would necessitate a whole host of further complicated changes to make Canvey Island's figures sit within the acceptable electoral variance boundaries due to Canvey West's current good level of electoral equality not being good enough to facilitate losing swathes of voters to Benfleet. It would also diminish the statutory requirement for convenient and effective local government. Canvey's two divisions are currently projected to be complaint under the status quo if ECC was increased by (net) two or three councillors.
11. If the Commission does prefer to use the new borough ward boundaries to build their proposal map, I have provided a suggestion on page 7 on how this could be constructed. However, please be aware that this uses the 2028 projected electoral figures supplied by the LGBCE for their borough review as I do not believe new polling districts have been made ready yet or circulated to anyone if they are.
12. I have not provided a proposal map here as it is not my preferred outcome but will be happy to do so if the Commission requests one.
13. Please see the next page for my data analysis based on the borough wards. I have also provided my second proposal's information there if you are inclined to prefer to use the borough wards as the basis of your review of that proposal. However, I have provided a separate analysis with your data for that on the page after.

			Target Electorate: Within 10% of	Minimum Electorate	Maximum Electorate
	<b>Borough Ward</b>	<b>Electorate</b>	15,812	14,231	17393.2
Proposal 1: Mainland	St George's	5,192	<b>Proposal 1:</b> Hadleigh gets 2/3 of Thundersley South Ward, w with the remainder split 50:50 between Benfleet and Thundersley. Thundersley and Benfleet split Tarpots Ward 50:50		
	Tarpots - SPLIT	6,083			
	Appleton	5,125	<b>ECC Division</b>	<b>Electorate</b>	<b>Variance</b>
	St Mary's	5,539	Canvey East	15,016	-5%
	Thundersley North	5,500	Canvey West	15,190	-4%
	Thundersley South - SPLIT	5,101	Hadleigh	14,175	-10%
	St Michael's	5,042	Thundersley	14,234	-10%
	Hadleigh St. James	5,032	Benfleet	14,205	-10%
Canvey Island	Canvey Winter Gardens	5,996	<b>Proposal 2: Benfleet with Bowers Gifford and North Benfleet</b> Hadleigh gets all of Thundersley South Ward, Thundersley gets almost all of Tarpots Ward (Note: figure below does not include giving a section of Tarpots ward to Benfleet)		
	Canvey Central	6,159			
	Canvey South - SPLIT	6,070	<b>ECC Division</b>	<b>Electorate</b>	<b>Variance</b>
	Canvey North	6,000	Hadleigh	15,175	-4%
	Canvey East	5,981	Thundersley	17,343	10%
			Benfleet	14,494	-8%
Proposal 2: Mainland	<b>Borough Ward</b>	<b>Electorate</b>	Note: Canvey's existing boundaries already have good electoral equality when ECC is increased to 77 or 78 cllrs		
	Bowers Gifford & North Benfleet	1,733			
	St George's	5,192			
	Tarpots	6,083			
	Appleton	5,125			
	St Mary's	5,539			
	Thundersley North	5,500			
	Thundersley South	5,101			
	St Michael's	5,042			
	Hadleigh St. James	5,032			

## Proposal 2 (My Preference): Transfer Bowers Gifford & North Benfleet From Pitsea Division to Benfleet Division

14. My second proposal would be much easier for the Commission to implement and is my preference for what should be taken forward. Like proposal 1, I suggest a simple increase of 3 councillors to ECC. This proposal uses existing polling districts only with no transfer of specific roads or other areas - though I have added a suggestion if the Commission is inclined to require adjustments. The polling districts in the following pages are colour-coded according to the existing division that the district is currently in.
15. I have not provided a borough-level proposal map here as I believe it is unnecessary as I have not suggested any breaking of polling districts and mostly retain the existing division boundaries. All divisions would also be contiguous. However, again I am happy to provide a map if requested.
16. I have calculated the electorate requirements if there were to be 78 Essex County Councillors and provided them below. I have also imitated the Commission's variance calculation for both Canvey and the rest of Castle Point. My calculations are present in the excel sheet that I will upload alongside this submission so that the Commission can double-check the formulas and calculations. The data for this proposal uses the 2029 projected electorate figures provided by the LGBCE for this specific consultation.

<b>Target Electorate: Within 10% of</b>	<b>Minimum Electorate</b>	<b>Maximum Electorate</b>
15,812	14,231	17,393

17. I suspect it is usually taboo for the Commission to delve into neighbouring districts/boroughs. However, I would make two points in this regard. Firstly, as mentioned earlier in this submission, a hypothetically perfectly divided Castle Point into 4 divisions rather than 5 would still have too many voters in every division to sit within the acceptable 10% variance limit. Consequently, either Rayleigh or Basildon would need to stray into Castle Point and such a taboo would then be breached regardless. Secondly, as Bowers Gifford and North Benfleet is due to be transferred to Castle Point for Parliamentary elections, there is a clear local precedent of a Boundary Commission accepting that uniting North and South Benfleet is preferable to other electoral arrangements.



18. Finally, as an aside, it must be noted that if the Commission found a Castle Point which was above the 10% variance in all divisions to be acceptable, then when the 2025 local plan (or government intervention/developer appeals) inevitably leads to population growth (via. housing development) then this would likely push all 5 divisions well above the 20% variance threshold. My proposal here and combination of districts below negates this outcome.

#### Canvey West and Canvey East

19. This is how the existing divisions are constructed, and I do not see any reason for them to be adjusted as both are within the limit for good electoral equality and meet the other statutory criteria. As the 2025 local plan will lead to population growth, I do not see it as necessary for the Commission to seek to mitigate the projected -7% variance in Canvey West.

Polling district	Electorate 2022	Electorate 2029	2029 Variance
<b>Canvey West</b>	<b>14,123</b>	<b>14,681</b>	-7%
AJ	2,060	2,159	
AK	2,946	3,109	
AS	1,368	1,415	
AT	2,857	2,886	
AU	2,753	2,866	
AV	2,139	2,247	
<b>Canvey East</b>	<b>15,060</b>	<b>15,840</b>	0%
AL	2,777	2,951	
AM	1,928	2,028	
AN	3,314	3,461	
AO	1,980	2,073	
AP	3,028	3,192	
AQ	2,033	2,135	

## Mainland Castle Point: South Benfleet, Hadleigh, and Thundersley

20. I have proposed in the table below a combination of existing polling districts which would require a few simple transfers to optimise electoral equality.

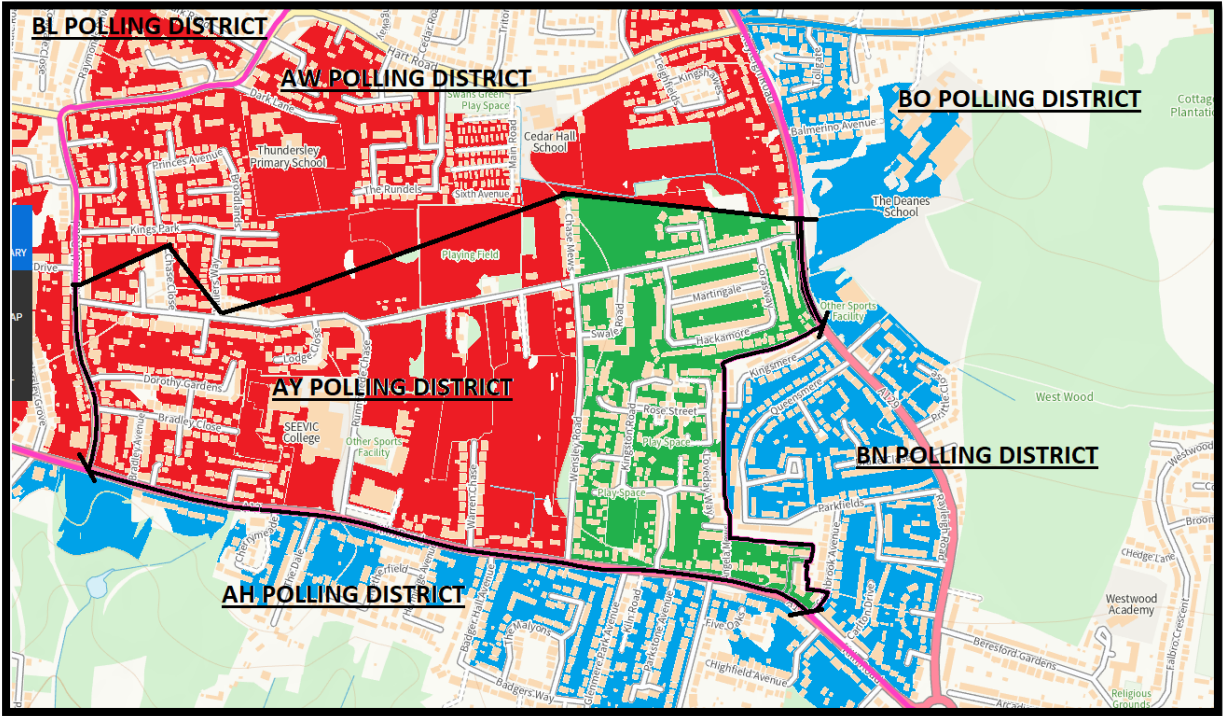
21. 'DN' is Bowers Gifford and North Benfleet, currently in the Pitsea division.

Polling district	Electorate 2022	Electorate 2029	2029 Variance
<b>Hadleigh</b>	<b>13,326</b>	<b>13,992</b>	<b>-11.51%</b>
AH	2,099	2,204	238 votes short, but these could be taken from a few roads in the AY polling district if needed
AG	1,244	1,312	
BC	1,843	1,907	
BD	1,690	1,775	
BE	1,868	1,954	
BN	2,446	2,594	
BO	1,611	1,689	
BP	525	559	
<b>Benfleet</b>	<b>13,874</b>	<b>14,576</b>	<b>-8%</b>
AA	1,266	1,304	
AB	2,214	2,333	
AD	1,827	1,909	
AF	1,976	2,073	
BF	779	810	
BG	2,734	2,870	
BJ	1,474	1,544	
<b>DN</b>	<b>1,604</b>	<b>1,733</b>	
<b>Thundersley</b>	<b>14,542</b>	<b>15,299</b>	<b>-3%</b>
AW	1,277	1,335	
AX	1,451	1,537	
AY	2,283	2,378	
AZ	1,297	1,362	
BA	1,270	1,341	
BB	1,873	1,996	
BK	3,156	3,311	
BL	1,935	2,039	

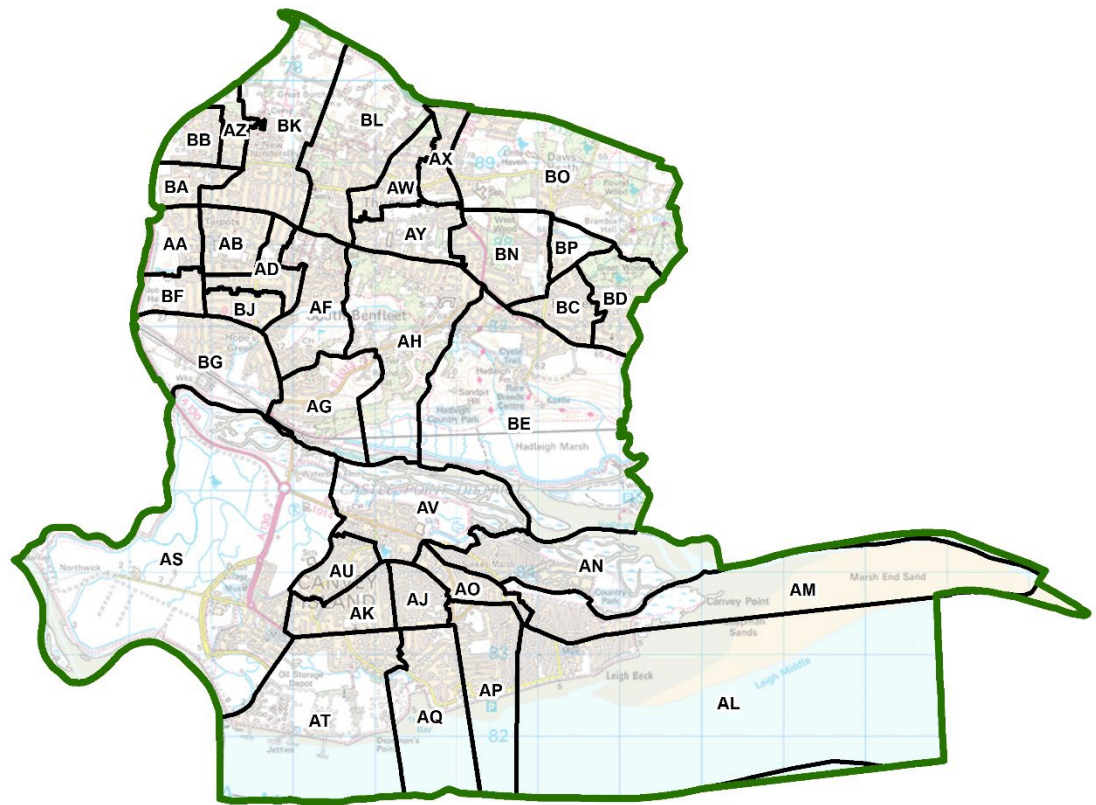
22. Regarding my Hadleigh proposal, I believe the Commission would be justified in dismissing the slight shortfall with the 238-vote deficiency as Castle Point will have housing development in the 2025 local plan that will certainly bring this division above the variance limit by 2029. For context, we already have planning applications and appeals in Hadleigh's division for more housebuilding (see Daws Heath, BO polling district) so I do not see this slight shortfall as justification for ECC's proposal that residents should have electorally unequally low representation. Alternatively, to my suggestion above, I would note that there could always be a shift of a few roads currently in the AY polling district (or even AX) and return them to the Hadleigh division to guarantee the electoral equality without making any drastic changes.

23. If the Commission would want specific roads for the transfer suggestion, my initial thoughts are below. However, I do not have road-by-road data so this suggestion is based on what appears to me to retain the community identity of the area. Alternatively, if this area has too many voters, then the Commission may prefer to transfer just the areas attached to Kingston road.

Black	AY's polling district's current border
Green	Proposed area to transfer from AY to Hadleigh
Blue	Proposal Hadleigh
Red	Proposal Thundersley



**24. Current Castle Point Polling Districts:**



25. Thank you for taking the time to consider my proposals. I must take this final opportunity to urge you not to follow ECC's proposal for reducing Castle Point's number of councillors, and to also not create a division spanning Canvey Island and mainland Castle Point. Please let me know if you would like any further information or suggestions regarding my proposals when you consider the next stages of the process.

26. I have provided this submission to the major political parties in Castle Point (the Canvey Island Independent Party, Conservative Party, Peoples' Independent Party, and the Labour Party) in case they are minded to endorse, or offer amendments to, my proposal in their own submissions.