

Buckinghamshire Council

Personal Details:

Name: Nicole Webster
E-mail: clerk@pennparish.org.uk
Postcode: [REDACTED]
Organisation Name: Penn Parish Council

Comment text:

Please find attached the comment from Penn Parish Council on the proposals to create a ward of Penn, Tylers Green and Loudwater. The Parish council recognises the challenges in creating a ward which balances a proper sense of place with ward numbers and is grateful for the invitation to comment again. Our original proposal was to be in a ward linked to Amersham, however this was rejected for lack of evidence, which we have addressed in this submission. An alternative proposal, should the former be judged unacceptable, is for the whole parish to be placed in a single Council ward which combines Penn Parish with Coleshill, which would achieve a better sense of place than the proposed Penn, Tylers Green and Loudwater, and be aligned with the proposed parliamentary constituency of Chesham and Amersham, which we support. In our view either, or linking us with other Chiltern villages like Coleshill, achieves a better balance for the Parish, as it recognises the centre of local government, and maintains a sense of each village's community, and sense of self, as part of a rural or semi rural Parish, in the Chilterns AONB. Sent on behalf of Penn Parish Council, and Chair Mike West. Penn Parish Council, Parish Office, Penn Church Hall, Church Road, Penn. [REDACTED]

Uploaded Documents:

https://consultation.lgbce.org.uk/download_document?file=draft%2F1670073705_PPC+response+to+LGBCE-final.docx

**Penn Parish Council
comments on
The Local Government Boundary Commission for England's proposals
that will affect
the future warding for Penn Parish**

1. Following publication in August 2022 of The Local Government Boundary Commission for England's draft recommendations ("the LGBCE draft") for new electoral arrangements for Buckinghamshire, Penn Parish Council ("PPC") comment as follows:

Existing Ward

2. Penn Parish, together with the Parish ward of Amersham (Old) Town and the Parish ward of Holmer Green currently form the existing ward of Penn Wood and Old Amersham. As of 2021, the ward has a total electorate of 8,539 represented by three councillors.

The LGBCE draft ward proposal

3. The LGBCE draft proposes that the Parish ward of Amersham Old Town becomes part of a new ward called Amersham & Chesham Bois while the Parish ward of Holmer Green becomes part of a new ward called The Missendens.
4. The LGBCE draft then proposes that the Parish Penn is to be warded together with both Tylers Green and Loudwater to create a new ward called Penn, Tylers Green & Loudwater. This proposed ward has an electorate of 9752 in 2021 and a projected electorate of 10,204 in 2028. The proposed new ward would be represented by two councillors, reflecting an average of 4876 electors per councillor in 2021 and 5102 in 2028. An electoral variance of +16% and +13% results.

The LGBCE draft proposal FAILS to meet any of the three Statutory Objectives

5. The LGBCE draft proposal for the new ward of Penn, Tylers Green & Loudwater fails to satisfactorily meet any of the three statutory objectives of The Local Democracy, Economic Development and Constructions Act 2009.
6. The proposed ward does not achieve good electoral equality with an immediate electoral variance of +16% and a reduced figure of +13% by 2028. This variance is highlighted by the LGBCE draft and recommended despite being somewhat higher than normal. It seems

this is due to the fact that the LGBCE found developing a warding pattern for this specific area particularly challenging.

7. Further, the proposed electoral ward unnecessarily mixes entirely different communities with distinctly differing identities. Loudwater is a densely populated urban area with large scale industry and office parks. Penn Parish is almost entirely rural, with 80% of the parish being within the green belt, areas of outstanding natural beauty and conservation areas. The Parish of Penn has notably different issues and interests to those of Loudwater. Additionally, significant and large parts of Tylers Green are made up of dense residential areas contrasting with the open rolling countryside of Penn Parish - again, different issues, different interests and different identities.

Minimal Evidence, incorrect interpretation and flawed recommendations

8. The LGBCE draft states that local resident's submissions and the Penn & Tylers Green Resident' Society ("the Society") have requested that Penn and Tylers Green be warded together. This is not correct.
9. That part of the LGBCE draft said to evidence the warding of Tylers Green with the Parish of Penn is largely misinterpreted and certainly misunderstood, resulting in incorrectly quoted evidence and misunderstood submissions. The conclusions are consequently flawed.
10. The LGBCE draft refers firstly to submissions from several local residents and secondly The Penn & Tylers Green Resident' Society ("the Society").
11. The authors of the LGBCE draft will be fully aware that of the 200 submissions by local residents for the entire county of some 443,064 electors, only three relate to the Tylers Green, Loudwater and Penn proposal. Three relevant submissions from a suggested new electorate of 10,204, represent a tiny 0.03% of the electorate.
12. Upon examination of the three local resident's submissions it is noted one supports a change of boundary for the village of Tylers Green and the village of Penn. This is not a request to ward Tylers Green with the Parish of Penn, as reported by the LGBCE draft. A second submission is unclear as to if it relates to the Parish of Penn or the Village of Penn. A third submission totally rejects any form of merger of Tylers Green with either the Parish or village Penn. These three submissions are not accurately reflected in the LGCBE draft and as a consequence, the final proposals based upon these representations are flawed and unsound.
13. The three local resident submissions DO NOT request that Tylers Green and the Parish of Penn be warded together.

14. It is also important to note that the Society which represents Tylers Green and Penn is an unelected body, with a large majority of Tylers Green residents, and its views should be weighed accordingly. Penn is but one of the villages in the Parish of Penn. The Society does not represent the wider Parish nor the other rural villages of Penn Street and Winchmore Hill or the communities of Knotty Green or Forty Green. The Society's submissions to this consultation therefore relate to Tylers Green and the village of Penn alone and not the Parish of Penn. No independent evidence has been collected from Penn residents to support its conclusions.

15. The Society says in its submission:

"The LGBC proposal puts Tylers Green with Loudwater and Penn as part of Penn Wood and Old Amersham. There is no pain-free solution and we would be happy to meet the Commissioners to discuss this when they visit in the autumn to consult about their initial recommendations on the County Council ward boundaries"

16. The Society DOES NOT request that Tylers Green and the Parish of Penn be warded together.

17. Such suggestions are poorly evidenced, factually incorrect and falsely interpret the very limited submissions received.

18. Separately, whilst Tylers Green and Loudwater currently exist as one ward, it does not follow that this should remain in any proposal or indeed be enlarged with the addition of another Parish.

Proposal

19. Following numerous informal consultations with local residents, businesses and others, Penn Parish Council is of the firm view that the LGBC can best achieve the task of balancing the statutory objectives by warding together the rural Parish of Penn together with the directly adjoining and rural Parish of Coleshill to create a new ward of Penn and Coleshill. The electorate of Penn and Coleshill would be represented by a single councillor.

20. Penn Parish is of the firm view that the whole Parish should remain in a single ward, and our proposal achieves this objective.

21. Although Penn shares a short boundary with Tylers Green and Knotty Green with Beaconsfield, each village has its own community, and facilities, which are more rural and importantly, each is surrounded for the most part by Green Belt/AONB. The recent Design Guide, prepared by the government's Locality Team, as part of the Neighbourhood Plan (October 2022) confirms there are five integral villages. They state:-

“Penn is a civil Parish made up of 5 small villages and is located in the south east of England, more specifically within the London Green belt in between Beaconsfield and Amersham. This means that despite its close proximity to London, there are still areas of the Parish which have a very rural feel to them.”

22. The Parish is preparing a neighbourhood plan, and the 5 villages are well engaged with response rates of over 30 per cent to recent consultations. The Neighbourhood Plan, sets out a comprehensive planning framework for the Parish for the next 20 years, which deals in detail with each of the 5 villages. Because eighty percent of the Parish lies in Green Belt, the parish faces severe planning constraints and is unlikely to be subjected to extensive housing development for this reason. Hence growth rates of 3% are predicted (for Penn) rather than the county wide average of electors of 8%, which looks unachievable.

23. Each village has its own community facilities: -

- Penn Street has its own Village Green a primary school, village hall, church, two cricket clubs and two pubs;
- Winchmore Hill has its a Village Green, village hall, two pubs and a village shop;
- Forty Green has its own village hall, nursery school and a pub,
- Knotty Green has a Village Green, thriving cricket club and pavilion (which is owned by the parish and used for local elections and events), and a pub;
- Penn village has a Grade 1 listed Church and village hall, plus two public houses, a Village Green and war memorial and shop and the doctor's surgery which also serves Tylers Green. Penn clearly has its own village facilities. In this respect, the submissions from P&TGRS that all facilities are shared with Tylers Green, is mis-leading. We would add that it is not unusual for clubs and societies to serve more than one village, which makes their operations viable. But this does not mean that Penn residents feel any less sense of belonging to Penn, or identify themselves as a belonging anywhere other than Penn, for example as part of Tylers Green. Penn residents are proud of their village, it is a very desirable location and as the elected body for the Penn village and Penn Parish, we feel well placed to comment on their sense of community and pride in their village.

24. An extensive network of footpaths across the AONB connect the Parish's five villages providing active, popular recreation.

25. Turning now to the issue of Penn Parish's link with Amersham. The convenient centre of local government for Penn Parish is Amersham, and has been the case for many years, as it was the site of Chiltern District Council's offices. It remains the case, even under Buckinghamshire Unitary Council. Offices in Amersham are the venue for local Buckinghamshire Council Planning meetings, and Officers provide support from Amersham, for day-to-day Parish requirements such as Highways and environmental

problems. Amersham Town Council, the large neighbouring town council, provides contractor support with some parish devolution work. Amersham New Town, with its Metropolitan tube line station (2.5m from our boundary) provides an attractive commuter route into London, with fares which are lower than the main line station at Beaconsfield (0.7m from our boundary) and many parishioners who work in London choose it for this reason. Amersham also serves Coleshill in the same manner.

26. Penn Parish is a ring of five settlements surrounding vital 'green lungs' which are under increasing development pressure. Concerns vital to our settlements such as planning, Commons management, woodland management, rights of way, arable farming, rural crime, access for farm vehicles and environmental matters, plus preservation of historic buildings, trades and pubs, are of considerable importance.

27. Penn Parish's Greens, Commons and Ancient woodland and idyllic village centres provide valuable amenity spaces to surrounding larger urban settlements such as Hazlemere, Beaconsfield and Holmer Green. But the Parish faces creeping urbanisation, for example in Knotty Green where there is pressure to subsume the village into the urban boundary of Beaconsfield. This should be resisted this because it endangers the future of a Chiltern village community, by dividing it. They will lose their integrity and identity and with it their own community voice. They will be outvoted on every issue that matters by their larger, more populous neighbour. In November, a large group of volunteers in Knotty Green planted more than seventy trees along village roads, funded by residents and supported by the Parish Council and Buckinghamshire Council. This is strong evidence for a village and community, with a sense of its own identity.

28. For the reasons stated above, the Parish does not support the recommendations of Buckinghamshire Council. We were disappointed our elected Unitary Council representatives were not consulted on the Unitary Council's proposal to place part of Knotty Green in the Beaconsfield ward. Worse still, our elected representatives were not invited to key meetings at which the unitary councillors from Tylers Green and Loudwater and Beaconsfield were able to express their opinions, contrary to Boundary Commission guidelines. Our requests for answers about who put forward the proposal were declined and our concerns have still not been adequately addressed. Proposed Conservative councillor representatives for Penn, Tylers Green and Loudwater will all be drawn from either Tylers Green or Loudwater according to Buckinghamshire Council's Head of Standards. We request no weight be given to the Buckinghamshire Councils support for the Penn, Tylers Green and Loudwater ward, for the reason that it is undemocratic, unbalanced and the recommendation does not reflect the views of our elected representatives, the Parish or its communities. We have asked our elected Unitary Councillors to write to you to confirm this (Cllrs J.Waters, M.Dormer and M.Flys).

LGBCE draft on Electorate Figures an Electoral Variance

29. The LGBCE draft quotes the existing 2021 county electorate of 410,789 and the forecast electorate of 443,064 for 2028 (the original forecast and considered to be a reasonable estimate for 2028). As the LGBCE draft states, this represents a predicted increase in the electorate of 8%. Further, as stated, with 98 councillors, the average number of electors per councillor will rise from 4,192 by 8% to 4,521.

PPC Proposed Ward and Electorate Figures

30. Based on the LGBCE draft electorate figures for 2021 and 2028 (2027), the PPC proposed new ward would consist of the following polling districts and electorate numbers:

District	Parish Ward	2021 (Actual)	2028 (2027) (Estimated)	Percentage increase
CUA	Penn	656	700	
CUB	Penn	1826	1869	
CUC	Penn St & Winchmore Hill	509	515	
CUD	Penn St & Winchmore Hill	175	184	
Total Penn		3166	3268	+3%
CU	Coleshill	462	478	
Total Electorate		3628	3746	+3%

PPC Proposed Ward and Electorate Figures and LGBCE Proposed Acceptable Electoral Variance

31. The following table shows the impact of a 3% increase in estimated electorate against an increase of 8% in the average electorate per councillor.

	2021 (Actual)	2028 (2027) (Estimated)	Percentage increase
Total Electorate	3628	3746	+3%
Target average electorate per councillor	4192	4521	+8%
Variance in numbers	-564	-775	
Percentage variance	-13%	-17%	

32. Following the LGBCE's own recommendations, a variance of -13% is somewhat higher than normal but nonetheless recommended. -17% is unlikely to be acceptable.

33. Statistics from the 2011 Census show the Parish has a population of 3,961 residents, comprised of 1,564 households occupying 1,627 dwellings. Since then, the office for National Statistics has released a mid-2020 population estimate of 4,217 for Penn Parish, indicating population growth of 6 per cent since 2011. Applying the ONS growth rate of 6 per cent to the total electorate, results in more acceptable variances of -9% and -13%.

Variance NOT Based on like for like calculations

34. From the above it will be noted that for the Parish of Penn and the proposed new ward of Penn and Coleshill, the estimated electorate in 2028 (2027) reflects an increase in the electorate of only 3%. The estimate is then compared with the county wide average of electors per councillor – which has been increased by a figure of 8%. It is therefore no surprise that the resultant electoral variance for 2028 (2027) falls outside acceptable limits.

Variance based on like for like percentage increases

	2021 (Actual)	2028 (2027) (Estimated)	Percentage increase
Total Electorate for new ward	3628	3746	+3%
Target average electorate per councillor increased by 3%	4192	4318	+3%
Variance in numbers	-564	-572	
Percentage variance	-13%	-13%	

35. Again, following the LGBCE's own recommendations, a variance of -13% is somewhat higher than normal but nonetheless recommended as acceptable.

Impact on the proposed ward of Chalfont St Giles & Little Chalfont with loss of the Parish of Coleshill

	2021 (Actual)	2028 (2027) (Estimated)	Percentage increase
Total Electorate for the ward	12,098	12,518	+3.4%
Target average electorate per councillor increased by 3%	4,033	4,173	+3%
Removing Coleshill	(462)	(478)	
Total	11,636	12,040	
Average electorate per councillor	3879	4013	
Percentage variance	-7%	-11%	

36. Following the LGBCE's own recommendations a variance of -11% is somewhat higher than normal but is considerably less than the variance currently proposed for the Penn, Tylers Green and Loudwater ward.

Impact on surrounding proposed wards

37. The PPC proposal will have NO impact on the LGBCE draft proposal for a new ward of The Missendens. Electoral variance of 0%

38. The PPC proposal will have NO impact on the LGBCE draft proposal for a new ward of Amersham & Chesham Bois. Electoral variance of +5%

39. The PPC proposal will have NO impact on the LGBCE draft proposal for a new ward of Beaconsfield. Electoral variance of +3%

40. The PPC proposal will have NO impact on the LGBCE draft proposal for a new ward of Flackwell Heath & The Wooburns. Electoral variance of +9%

41. The LGBCE draft seeks to impose a recommendation that does not reflect individual community identity and is an entirely ineffective proposal striking an extremely poor balance between the three considerations drawn from the statutory objectives.

42. The proposal is also mis-aligned, as compared with the proposed parliamentary constituency of Chesham and Amersham, which we support, and with which we strongly identify.

43. We recognise the Boundary Commissioners face a challenging task balancing the competing demands of electoral ward numbers with community identity, but the current proposal does not reflect our villages sense of belonging, their sphere of local government and the ward is numerically unattractive. We urge the Commissioners to consider the proposal for a single councillor unitary ward of Penn and Coleshill to achieve a better balance and proper sense of place.

Mike West, Chairman
Penn Parish Council,
The Parish Office
Penn Church Hall,
Church Road, Penn. [REDACTED]

