

Worcestershire

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Comment text:

Related subject: Warndon Parish (also known as Warndon Villages) in Worcester

Please see the attached file containing the submission from Warndon PC.

Attached Documents:

- warndon-pc-response-to-county-lgbce-draft-recommendtions.pdf

Warndon Parish Council

Response to LGBCE re County Council Boundary Review

Introduction:

Warndon Parish Council is concerned about the impact on the parish from the proposals included in the "Draft Recommendations", as published in January 2024.

In very simple terms, the specific impacts we anticipate from the proposals are:

- Confusion for residents as to their locations relative to the various wards/divisions;
- Complications in the administration of electoral arrangements for parish residents;
- Fragmentation of the identities of communities in the Aconbury/Oaklands/Swinesherd areas - in terms of local representation.
- Complications in the relationships between parish and county councils - in terms of local representation.

The impacts on the parish arise from the following:

- **The proposed lack of coterminosity** between the parish, city and county boundaries with the adjacent Nunnery ward/division.
- **The proposal to split the parish** across two county divisions.
- **The proposal to create a third (tiny) parish ward.**
- **Suggestions of upcoming developments/future growth...**
- **Concerns about the Boundary Review process:**
 - Concerns about "**community identities and interests**", as assumed in regard to Warndon parish.
 - Concerns about "**internal communications links**", as interpreted in relation to the Warndon parish boundary.

Those issues are dealt with below. In addition, we share some thoughts on how our concerns could perhaps be addressed.

Lack of coterminosity:

The proposal to create a third boundary between Warndon parish and Nunnery is concerning. The existing county division boundary is currently coterminous with the existing city ward boundary, which has just been confirmed following the recent city ward Boundary Review. Given that fact, the proposal for the boundary between Warndon parish and Nunnery county divisions not to be coterminous with either of the other boundaries has come as a shock.

In a three tier area, the proposal for different boundaries for each tier of local government seems to be a recipe for confusion for residents.

As well as failing to meet the LGBCE's aim to achieve coterminosity as far as possible, it also produces the complete opposite of "convenient and effective local government" for administration purposes, as described in the LGBCE's own Technical Guidance, which states that:

"3.18: A ***misalignment of electoral boundaries for county, district and parish*** elections is both confusing for electors and an impediment to effective and convenient local government."

Furthermore, the Technical guidance states that:

"7.8 The importance of parishes should not be underestimated given that, **where they exist, we will seek to use them as the building blocks for wards or divisions**. In light of this, it is important that where any council's review [of] parish arrangements is to be undertaken, the order implementing any external boundary changes is made before we commence an electoral review of the area."

(See later section - "**Concerns about the Boundary Review process**")

[At this point, it's perhaps worth asking the question: are there many other recent LBCE Reviews resulting in three tier areas with no coterminosity between any of the tier boundaries?]

The proposal to split the parish...:

The proposal to split the parish cross two divisions appears destined to add to the confusion.

This proposal comes at a time when close liaison, understanding and responsiveness between the parish and county councils are increasingly important. For example:

New High School:

- A new High School is scheduled to be built in the parish over the next two or three years.
- The school is planned to be sited within what would be the "third ward" in the parish. As proposed, that site would be located on the northern edge of the Nunnery division.
- One of Warndon PC's main concerns about the forthcoming school relates to pedestrian and cycle journeys between the main populated areas of the parish (located in one division) and the location of the new school site (located in the other).
- Nunnery division already contains a High School, Sixth Form College and Primary School. Warndon parish division (currently) contains just one Primary School.

Car parking/traffic close to the hospital:

- One of the great bugbears for residents in the Aconobury/Oaklands and Harleys areas of Warndon Villages in recent years has been the increase in traffic along Newtown Road, and the problems of fly-parking by people working at the Royal Worcestershire Hospital site.
- At the moment, the residents and the hospital are located in the same county division, allowing direct and speedy response in relation to the issue. The proposal to make Newtown Road the division boundary will thereby add an extra level of complication in terms of getting such issues resolved. Two County Cllrs; two liaison officers, etc.

[nb. Warndon is not a small parish. With a population of over 11,500, it is closer in size to a town.]

Naming the division:

Warndon PC provided two options for the naming of the county division covering the parish:

- The first - "Warndon Villages" - was proposed for the eventuality that the division would be coterminous with the parish.

- The second - "St Nicholas & Leopard Hill" - was proposed for the eventuality that the division boundaries remained the same, coterminous with the city ward boundaries.

The Draft recommendations proposal would involve a third boundary, in which case neither of the proposed names would be suitable, as they would each cause confusion, as follows:

- "Warndon Villages" as a division name would be confusing, as it would exclude part of... "Warndon Villages" parish.
- "St Nicholas & Leopard Hill" would be confusing, as it would exclude part of "Leopard Hill" city ward.
- For residents of (say) Swinesherd, they would find themselves in:
 - Parish - Warndon Villages South ward
 - City - Leopard Hill ward
 - County - Nunnery division

*[nb. The rationale for the names given to the city and parish wards in the recent Worcester City Council Boundary Review was set out in the submission from Warndon PC, dated January 2023 - copy attached at **Appendix A**. Part of that rationale was to try to avoid confusing the electors!!]*

The third (tiny) parish ward:

It appears that in the proposed "third ward", there would be approximately 323 electors - out of a total parish population of approximately 8,000 electors. At the very least, this brings into question the electoral equality of the parish wards.

[Warndon PC appreciates that the LG BCE is not bound by law to ensure electoral equality at parish ward level. However, such a big discrepancy between parish ward numbers seems rather absurd in a large parish such as this...]

Suggestions of upcoming developments/future growth...

Warndon PC disputes some of the wording in para 69 of the Draft Recommendations report:

"The Council proposed to extend the division boundary of Nunnery to the Warndon parish boundary. However, in our draft recommendations, we propose to extend the boundary into Leopard Hill **to account for upcoming developments** and also propose that the boundary follow the B463 road. Warndon Parish Council submitted a response urging us to rename the division St Nicholas & Leopard Hill to reflect the city wards that make up this division. Our proposals will involve the parish warding of Warndon Parish and we have therefore adopted the parish ward name of 'Warndon Villages' proposed to us by the parish council as well as its suggested division name. We consider these proposals to better reflect community identities and interests, and also **take account of future growth in the area.**"

The words highlighted above suggest that there will be "future growth" and "upcoming developments" in the area of the new, third ward. The phrases appear to have been used to provide some indication that the number of electors in the ward is likely to grow. We believe that these assertions are based on out of date information.

As Warndon PC understands it, there are no plans for further housing in that area of the parish:

- The Local Plan (SWDPR) is currently at an advanced stage of adoption, as it has been submitted to the Inspector for formal examination. There are no proposals within the SWDPR for housing development in the area - other than those houses

already built. Previous allocations - or proposed allocations - have been de-allocated or not supported by the South Worcestershire authorities.

- Warndon PC's Neighbourhood Plan - currently at draft stage - also contains no housing proposals within the area of the proposed third ward.
- On that basis, the highlighted statements in para 69 appear to be erroneous.

Given the above evidence, the prospects of any significant increase in the number of electors in the proposed third ward beyond the current figure (323) appear to be rather limited.

The Boundary Review process - from Warndon PC's perspective:

The application of coterminosity...:

In a nutshell, the Draft Recommendations appear to propose that the county divisions within the city should be coterminous with the recently changed city ward boundaries - except in the case of Warndon parish... (Is this an inaccurate summary of the situation?)

Evidence considered in the Boundary Review:

It would appear that, in some circumstances, evidence has been provided to the LGBCE in response to specific "threats" of transfer of electors from one division to another. LGBCE appears to have accepted that evidence in reaching its recommendations.

In contrast, for Warndon parish there was no such evidence provided. But, at that stage of the consultation, Warndon parish was not under any threat to the integrity of its parish boundary. In fact, quite the reverse. The County Council proposed coterminosity of the division boundary with the parish boundary, exactly as Warndon PC would have wished. (This proposal was dismissed by the LGBCE on the basis that the parish boundary in the Aconbury area is not deemed suitable for county division/city ward boundaries, as some residents are effectively "cut off" from the rest of the parish. Warndon PC anticipated that the LGBCE would take this view, as they had already done so in the city ward Boundary Review. Hence the two options proposed regarding the naming of the division.)

So, Warndon PC perceived no threat to the parish, and therefore made a submission on that basis. However, the Draft Recommendations have changed that perspective, and Warndon PC wishes to highlight the following points in respect of the coherence of the parish as a whole...

Shared community identities and interests:

It is fair to say that the character and interests of the majority of residents in the Aconbury and Oaklands areas appear to be very similar to the majority of residents in the rest of Warndon Villages. All in all, the vast majority of the parish - as built since the late 1980s - has the character of what used to be known as a commuter belt, with many residents working at distance from Worcester.

Perhaps the most obvious sign of the strength of the communities in the Aconbury/Oaklands areas is the strong sense of outrage directed at proposals to build on the Green Space to the north of their homes - towards the summit of Leopard Hill. The strength of that feeling, and the evidence provided by local city/county Cllrs as well as Warndon Parish Council, has succeeded in rebuffing such proposals. (Hence the current proposal in the SWDPR not to allocate any of the remaining Green Space on the golf course for housing or other forms of development.)

Dare one say that, in reality, Newtown Road forms the true boundary between communities in that area? Perhaps a future Community Governance Review would be the best way to resolve the matter of the suitability of the parish boundary?

A brief note on some historical matters...

"Warndon Villages" is an interesting area. It was created as a result of two events in the 1980s: the formation of Warndon PC (1983), and the adoption of the Warndon Local Plan (1988).

The boundary of the Warndon Local Plan "development area" was effectively almost exactly coterminous with the current county division boundary. (ie. It included all of the properties to the north of Newtown Road. For some reason, the parish boundary was never adjusted to incorporate this part of "Warndon Villages".)

As key features within the overall development, the former golf course, as well as the Ronkswood Hill Meadows LNR, and the land adjacent to Aconbury Orchard were deliberately left as areas of Public Open Space - along with many other such areas across the parish. This was an important factor in balancing the layout of the area between employment, housing and the environment. It's worth mentioning that the City and County Councils worked with the Countryside Commission to ensure that the development worked with the local environment, rather than against it. Hence the retention of woodlands, hedgerows, trees, ponds, etc, as far as possible. Whilst this is the norm, now, it was quite radical at the time.

The ethos underlying the creation of Warndon Villages has strengthened noticeably over the course of the last decade. In particular, the number of volunteer activities helping to protect the many Green Spaces in the parish has grown. This includes the "Friends of Warndon Villages" gardening group; the Worcester Environment Group - which started life in the parish and has spread across the city; litter picking groups such as the Warndon Wombles, as well as many unsung heroes/heroines who litter pick in their own local areas. Similarly, a Foodbank doorstep collection scheme was instituted in June of 2020, in response to the impact on donations arising from Covid. These groups work across the whole of the parish, and some work further afield.

Community identity is a difficult concept to gauge and to demonstrate; but those sorts of groups certainly embody a very positive community spirit which increasingly manifests itself right across the parish.

Internal communication links:

The above information helps to explain why the layout of the parish means that there are some "outlying" areas of the parish, which could be said to be geographically "disconnected", or "detached" from the rest of the parish..., but that would demonstrate a lack of understanding of the area as a whole.

In reality, all parts of the parish, including Aconbury, Oaklands and Swinesherd, are connected by pathways and pedways incorporated into the original layout of the area, back in the late 1980s. And, as indicated above, they are also connected by a sense of community in many disparate ways.

On the subject of "internal communications links", the LGBCE's Technical Guidance states the following:

"4.64 Our recommendations for ward boundaries will **normally** provide for people to move between all parts of the ward without having to venture outside of the ward. This normally means vehicular access by roads (but not including restricted-access roads such as motorways). Road access may include the use of

roads which themselves form a ward or division boundary.

4.65 There may be occasions, however, when parts of a community are linked not by vehicular routes but by footpaths, footways, pedestrianised streets, pedestrian and vehicular ferries etc. These will be more likely to be acceptable in densely populated residential areas of towns or cities, where community identity may be centred on local schools, health facilities, religious facilities, recreational or shopping facilities. ***In some cases***, and especially in rural areas ***where topography has determined settlement patterns***, the formation of wards which reflect both active ties between communities and parish boundaries may lead us to recommend wards where there are no direct communication links between all parts. In these instances, we will look for evidence of community ties, local travel patterns and, if appropriate, local public transport provision and usage."

The above extract is presumably the basis for LGBCE's view that the parish boundary between Nunnery and Warndon parish would not be "suitable" for either the city ward or the county division boundary.

However, the word "normally" - highlighted in para 4.64 above - allows for special circumstances. The words highlighted in para 4.65 seem to be a pretty good description of the situation that the Aconbury/Oaklands areas find themselves in. Leopard Hill is the topographical feature which both defines the area and causes separation between parts of the Warndon Villages community. However, that separation is purely a matter of distance, not disconnection or detachment from the Warndon Villages community.

As indicated above, the precise line of the parish boundary - in the Aconbury/Oaklands area - is simply a historical anomaly, dating from before almost any of the housing was built in that area. However, it forms a perfectly serviceable boundary for parish purposes, and so could do so perfectly well for county purposes - couldn't it?

Is there really such a practical difficulty with it that would justify going to the lengths of creating a third parish ward and a third boundary between Nunnery and Warndon parish? It hardly seems credible.

Warndon PC's suggestions...:

Warndon PC requests that the LGBCE should:

- Review the basis on which coterminosity was proposed for the majority of the Worcester City divisions, but not for Warndon Parish.
- Consider Warndon PC's case for maintaining some degree of coterminosity between its three tiers of local government.
- Consider whether it might be better - as a matter of principle - to consider coterminosity within three tier areas first, prior to moving to the two tier areas, to avoid circumstances such as the one impacting on Warndon parish at the moment.
- Consider whether it would recommend a Community Governance Review in respect of the parish boundary and its relationship to the other housing developments on the north side of Newtown Road, in the Aconbury/Oaklands area, including the former Ronkswood Hospital site.

Cllr Andy Taylor
(on behalf of Warndon Parish Council)
17th March 2024

**Worcester City Council Boundary Review
Submission by Warndon Parish Council - January 2023**

Introduction:

Further to the document submitted by Cllr Andy Taylor in July 2022 - which was endorsed by Warndon Parish Council (WPC) in October 2022 - this submission is in response to the draft proposals published by the Boundary Commission (BC) in November 2022.

For clarity, this submission is made on behalf of WPC.

Overall response to the draft proposals:

Overall, WPC is very happy with the draft proposals regarding the city wards affecting the parish, and is grateful that its views have been taken into account - in particular in relation to the use of the term "Warndon Villages..." rather than "Warndon Parish...".

WPC also accepts the BC's rationale (set out in para 72 of the draft proposal document) that the southern boundary of the southern ward would not be changed to be coterminous with the parish boundary.

However, as was indicated in para 78 of the draft proposals, it is the non-coterminous boundaries which have caused much confusion to "...residents south of Aconbury Orchard and Leopard Hill [who] do not identify as living in Warndon Villages."

So, in light of the above, WPC now has further suggestions in relation to the ward names - particularly in respect of "Warndon Villages South".

Warndon Villages South city ward:

In response to the final sentence of para 78 of the draft proposals ("*...we are inviting suggestions on how to include this area in the name of the southern ward...*"), WPC has now concluded that it would find either of the following two options acceptable:

- "Warndon Villages South with Leopard Hill", or
- "Leopard Hill".

The key points relating to each option are set out below:

- **"Warndon Villages South with Leopard Hill":**
 - This name indicates that some of the ward is outside the parish area;
 - It maintains the "Warndon Villages" element, which has wide local resonance;
 - It would differentiate between the name of the parish ward "Warndon Villages South" and the city ward "Warndon Villages South with Leopard Hill", which is important, as the two wards are not coterminous;
 - On the downside, WPC accepts that it is a bit of a mouthful.
- **"Leopard Hill":**
 - Leopard Hill lies within the parish and - crucially - includes the whole of the area of the ward outside the parish;
 - It is the highest point in the city and has clear geographical importance to the local area, offering views across much of the county;

APPENDIX A

- The name has the benefit of some degree of local popular support - as indicated by recent social media discussion - although the overall scale of that support is as yet uncertain;
- The downside of using it as a ward name is that it might be considered to be a significant departure from the existing ward name. (Would that be a problem for the BC or for Worcester City Council?)
- Also, WPC notes that, according to the BC's own technical guidance:
*"4.62 We may adopt compass point names when there is not a more suitable name. These are generally more applicable in larger urban and suburban settlements. In this case the compass point reference used will generally form a suffix where the rest of the name refers to a population centre, for example Buckingham East. **Compass points will normally be used only where they are relative to another compass point** (i.e. Buckingham West should only be used where a Buckingham East has also been proposed)."*
- So, using the logic of the above guidance, if the name "Leopard Hill" were to replace "Warndon Villages South" (as the city ward name), then presumably there should also be a different name for "Warndon Villages North". In such circumstances, WPC would propose the name "**St Nicholas**" as a suitable alternative. The church itself is the most significant historic feature in the whole of the parish, and it is very closely associated with the area.

Summary of WPC's preferred outcomes from the Boundary Review:

- That references to "Warndon Parish" should be superseded by "Warndon Villages" in respect of the ward names - as already indicated in the draft proposals;
- That there should be a clear differentiation between the city ward name and the parish ward name - for the southern ward in particular - given that the two wards will continue to encompass different areas;
- That the city ward names should be consistent with each other, along either of the following lines:
 - Option 1:** "Warndon Villages North" and "Warndon Villages South with Leopard Hill"; or
 - Option 2:** "St Nicholas" for the northern city ward and "Leopard Hill" for the southern ward.

(WPC would be content with either of the above options.)

- That the parish ward names should be "Warndon Villages North" and "Warndon Villages South" - as already indicated in the draft proposals - regardless of which of the above two naming options is chosen for the city ward names.

Cllr Andy Taylor
(on behalf of Warndon Parish Council)
January 2023