

Malvern Hills District Council

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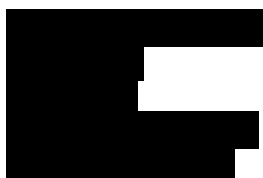
Comment text:

The assumption, made by the LGBC, that Bushley, Holdfast and Queenhill CPs form a cohesive unit is false. Holdfast and Queenhill have far closer ties to Longdon CP (their joint administered under a unified Parish Council reflects this) and even to neighbouring areas of Upton on Severn CP. Their combined electoral roll is only 90, which represents a ward size variance of less than 0.5%. Consideration of Legal factors 1, 2 and 3, as noted in the "How To" web graphic, make it very clear that substantial issues impacting the community and its administration (factors 2 and 3) far outweigh the impact on size variances (factor 1). Queenhill and Holdfast should be retained in Longdon Ward as at present, and not moved to Ripple. These comments are expanded on in the attached document.

Uploaded Documents:

https://consultation.lgbce.org.uk/download_document?file=draft%2F1647083429_LQH-boundaries-comment-12-03-2022.pdf

Comments on the *Local Government Boundary Commission for England: Draft Recommendations for Malvern Hills District Council*



Date: 12 March 2022

About me

1. I am a resident of Queenhill CP, having first moved to Holdfast in the 1960s. For over 20 years I was a Parish Councillor for Queenhill. For most of that time I represented the Longdon, Queenhill and Holdfast PC on the MHDC branch of the Worcestershire CALC, and represented the MHDC branch on the CALC itself. I retired around five or so years ago.

Summary

2. These comments and the proposals they contain are primarily concerned with the Local Government Boundary Commission (LGBC) recommendation to move Bushley, Queenhill and Holdfast civil parishes (CPs) into Ripple Ward.
3. They are argued on the basis of the three legal factors the LGBC has asked respondents to consider, viz. electoral roll sizes, local community and local governance.
4. The main observations are that, with respect to Queenhill and Holdfast CPs:

They do not form a natural grouping with Bushley. The assumption of this grouping by the LGBC is a mistake.

They are jointly administered with Longdon CP under a single Parish Council, and this reflects strong ties in both community and administration.

Their combined electorate is only 90. Their allocation has an impact on ward size variances of less than 0.5%.

The Draft Recommendations have given undue weight to minor adjustments of ward sizes in order to reduce statistical variances in support of Legal factor 1, and have not sufficiently taken into account either community interests and identities (Legal factor 2), or the effectiveness and convenience of local government along with intra-ward links (Legal factor 3).

Consequently, Queenhill and Holdfast should be retained within Longdon Ward and a single percentage point increase in maximum ward size variance accepted.

5. No comment is made on the identification of boundaries, as those referred to here are all clearly marked on the maps accompanying the Draft Recommendations.

Background

6. The Local Government Boundary Commission's (LGBC) website states:

The Commission is carrying out an electoral review of Malvern Hills District Council.

The aim of the electoral review is to recommend ward boundaries that mean each councillor represents approximately the same number of voters.

We also aim to ensure that the ward boundaries reflect the interests and identities of local communities, as well as promoting effective local government.

7. The reviewing of parish boundaries is not within the remit of these recommendations.

8. The LGBC key guideline on "How to propose new ward boundaries" gives three legal factors to consider;

- 1 New wards should leave each councillor representing roughly the same number of voters as other councillors elsewhere in the authority.*
- 2 New wards should – as far as possible – reflect community interests and identities, and boundaries should be identifiable. Consider transport links, community groups and facilities, natural or physical boundaries, parishes and shared interests.*
- 3 New wards should promote effective and convenient local government. Consider the number of councillors for, the geographic size of, and the links between parts of the ward.*

9. The Draft Recommendations make the following key statements:

10. Taking up (para 50) a minority suggestion (Paras 46,47) that the parishes of Bushley, Queenhill and Holdfast are a cohesive unit, and move the unit *en bloc* from Longdon ward to Ripple.

11. They also note the river blocking all access to the rest of the ward and state (Para 50) that;

We acknowledge that there may be access concerns for Bushley, Queenhill and Holdfast parishes to the rest of the ward, and so would welcome comments on whether this warding arrangement would allow for effective and convenient local government. We also note that this separates Holdfast and Queenhill from their other grouped parish of Longdon, and would welcome comments on what impact this might have, and if there are other viable warding patterns we can consider that keep the grouped parish in a single ward.

12. The comments below address this last at some length.

Queenhill and Holdfast

13. **Electoral roll.** The combined electoral roll of Queenhill and Holdfast (QH) is no more than 90. (Figures for each are sometimes published, but the numbers are not collected separately and the total is sometimes published twice over, i.e. once for each parish. The mistake should not be made of adding it to itself to double the apparent total).
14. **Community.** QH residents and workers form the majority of the tightly-knit community around the Queenhill loop road. At the Holdfast end, the community spills over into Upton upon Severn CP, where the Queenhill Women's Institute hall provides a focal point. At the other end of the area lies Queenhill Church, which residents of the loop road and its environs attend. It recently raised a considerable sum locally for extensive restorations and is the community's preferred venue for religious matters, including burials.
15. Both QH parishes have boundaries with Longdon CP. The QH community has active ties with its Village Hall and also to some extent Longdon Church.
16. Queenhill is separated from Bushley by the M50 motorway and a private school, with road access only via the school grounds (by permission, which is not always forthcoming) or round through Longdon, under the motorway and on again through Buckbury. When the M50 motorway was constructed, it cut through both Queenhill and Bushley. In recognition of the community separation this introduced, the parish boundaries were redrawn to follow along the motorway. Holdfast has no boundary with Bushley. Bushley has its own Parish Church and community hall, however due to the long roundabout access, the QH community generally prefers to utilise the more convenient Longdon amenities when required. There are few if any community-level ties with Bushley.
17. **Local Government.** A single Parish Council jointly administers Longdon, Queenhill and Holdfast. Joint services supporting QH include a lengthsman, notice boards, movable speed warning sign and representation to higher local authorities on local issues such as proposals for gravel extraction. Under the Draft Recommendations, the Council area would be split into two

wards, each with its own representative at District level. As with any division into parish wards, this would create administrative complications. Transferring grant finance and other higher administrative oversight of the services mentioned would be particularly cumbersome and unproductive.

18. A joint initiative between Longdon and Bushley PCs to operate traffic speed warning signs was started perhaps ten years ago. However administrative difficulties led to each PC largely going its own way after only a couple of years. I was never aware of any other administrative links with Bushley during my lengthy period as a Parish Councillor.
19. When participating in local and national elections, there is no established polling station in QH parishes; the residents share Longdon's use of Longdon Village Hall. Warding the area administered by the Parish Council, as recommended, would introduce unusual complications. Some elections would be affected but not others. For District Council elections, would the electorate have to traipse through Upton or Gloucestershire to vote somewhere in Ripple? Most would not bother, to the detriment of local democracy. Or would balloting arrangements for both wards be set up side by side in the same Longdon station? That would be equally open to confusion and error. Worse, elections at multiple levels, for example national and local, are often conducted simultaneously, in which case the returning officers must ensure the appropriate customised sets of ballot papers are prepared for each level of election at each polling station involved and that voters are aware of their particular arrangements; the confusion and error would be multiplied.

Bushley

20. The electoral roll of Bushley CP is large enough that reallocating it away from Ripple Ward would have a significant impact on the ward variances.
21. Bushley has few if any community-level links with Longdon, Queenhill or Holdfast CPs. It is my understanding that it has little more with Eldersfield CP, its other neighbour in Longdon Ward.

Ward sizes

22. Retaining Queenhill and Holdfast within Longdon Ward will reduce the number of electors in Ripple by 90 and increase the number in Longdon by the same amount, compared with the draft recommendations. Together they represent a ward size variance of less than 0.5%.
23. This small amount does marginally add to the already high magnitudes of the variances of Longdon and Ripple wards. During the course of researching these comments, in an effort to reduce these variances I examined several other warding patterns. None that I could come up with was anything other than destructive of local communities. I believe this needs to be faced squarely; Ripple is simply too small a community to fit the desired pattern.

Proposal

24. I propose simply that Queenhill and Holdfast CPs should be retained as they are now in Longdon Ward, and the recommended move to Ripple abandoned.

Conclusions

25. Queenhill and Holdfast have significant community and administrative ties to Longdon CP. They also have community links to neighbouring areas of Upton upon Severn CP.
26. However there are effectively none between Bushley on the one hand and Queenhill or Holdfast on the other. The LGBC argument for grouping the three has no merit.
27. Similarly, there are neither community nor administrative links to Ripple.
28. Administrative arrangements, especially for elections, would be badly affected by any move of Queenhill and Holdfast to Ripple Ward.

29. The electoral roll of Holdfast and Queenhill combined is only 90 (their figures are never available separately). The impact on ward size variances of retaining them in Longdon Ward would be insignificant.
30. Taken together, the significant impact of multiple issues under Legal factors 2 and 3 must take precedence over minor tinkering aimed at Legal factor 1. There can be no question but that Holdfast and Queenhill should be retained within Longdon Ward and the recommended move to Ripple abandoned. It is my understanding that a number of local residents are also making their own comments to this effect.