

Mole Valley District Council

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Comment text:

The attached letter and appendices are on behalf of all Conservative District Councillors within Mole Valley and represent the views of our residents and their concerns. There has been no public consultation and this has caused major faults within the proposed new boundaries.

Uploaded Documents:

[Download \(https://consultation.lgbce.org.uk/download_document?file=draft%2F1654513687_Boundary+Commission+6.6.22.pdf\)](https://consultation.lgbce.org.uk/download_document?file=draft%2F1654513687_Boundary+Commission+6.6.22.pdf)

Mole Valley Conservative Association/ District Councillors Group

**212 Barnett Wood Lane,
Ashted
KT21 2DB**

Local Government Boundary Commission for England

Via email: reviews@lgbce.org.uk

5th June 2022

Dear Sirs,

**Ref: Mole Valley Boundary Review- Local Government Boundary Commission for England ("LGBCE")
Electoral Review**

With reference to the Boundary review, as the Conservative Councillors Group within the district ward, we would like to submit for consideration our disquiet at the suggested boundaries. In this submission, we would like to bring to the Commission's attention some misleading data that has been used by the current Administration of the Council, many of the views expressed to us by residents/ Residents' Associations and our own knowledge of the village and its communities.

We are aware of the needs of the Commission and the criteria set out by the LGBCE:

- Delivering Electoral equality for local voters
- Reflecting the interests and identities of local communities
- Promoting effective and convenient local Government

Considering the above criteria set out by the Commission, Mole Valley District Council, should have undertaken a full public engagement and prepared the current submission. Unfortunately, there was no public consultation or engagement. This means that there is no data on how communities wished to retain their identities and how these proposed changes would lead to positive Local Government.

With no public consultation and a politically balanced working party instead, the overall submission is clearly attributable to the Liberal Administration of Mole Valley District Council, with 46% of the District Council (19 out of 41 current district councillors- council year 21-22) opposing the proposals having taken views from their community. Therefore, it is fair to say that the proposal represents no more than 22 councillors' views.

It is worth noting that 46% of the Council were also minded to accepting a 4-year voting cycle rather than the annual arrangement to remain in place. The adoption of 4-year voting would allow for cost saving and a higher turnout and therefore greater electorate involvement in the running of Local Government. The system of an annual voting cycle reduces the turnout drastically within Mole Valley, as seen in recent elections. The current submission therefore fails on the final needs of the Commission, "promoting effective and convenient local Government".

This leaves the proposal submitted and its adoption by the Commission open to judicial challenge and allows for the data to be challenged.

We are also aware that the adoption of the following was undertaken by MVDC, in their view following LGBCE, which as we analysis the detail, there are some fundamental errors in the method of calculation below, most notably the Local Plan Development figures

"We got to the electorate figures that we did, our electorate forecast was calculated in line with guidance issued by the LGBCE. As a starting point, we had to input electorate figures, at polling district level, for the previous three years. The tool provided by the LGBCE then calculated a standardised electorate forecast for 2027. This is based on previous rates of growth in the electorate and ONS projected population increases. We could then either accept this figure or provide an alternative forecast for each polling district. To determine where we wished to challenge the standardised forecast (again in line with the LGBCE guidance) we looked at the number of dwellings delivered between 2016-2021 and the number of dwellings forecast to be occupied by 2027. These figures include properties which have been granted planning permission and housing sites for delivery and occupation by 2027, as identified within the Draft Local Plan, and which colleagues in planning had a high degree of confidence would be completed and occupied by 2027."

The incorrect Development Plan data is attached and is challenged on the Local Plan dwelling numbers below. So, let us look at the main areas and our objections in more detail.

Our initial objection is that development submitted has not considered the full extent of the new dwelling numbers in the Local Plan. There is an appreciation of the 2027 timeline, but most of the large-scale developments within the plan will be started or undertaken within that timeline (for developers, time is wasting money) and yet, many of these larger developments do not appear in the development numbers included in the MVDC submission. This is a grave error and below is listed some major developments, that will radically change the ability of the newly elected Councillors to be balanced with equal electorate numbers.

1 Anomalies in the predicted elector data

Looking at the elector data produced by Mole Valley District Administration, there is sufficient information and awareness of the changes in dwelling numbers predicted within the Local Plan to significantly impact the ward boundaries.

Anomalies and potential impact in elector numbers are listed below for just 4 main areas, our 2 main towns and 2 villages. All the new data is available within the District Council- Local Plan

1 Hookwood

Local Plan	Quoted		Known	
	net dwellings	electorate	likely dwellings	new electorate
Land west of village	0	0	445	756
Povey Cross Farm	0	0	84	142
Potential additional				898

2 Leatherhead

Local Plan	Quoted		Known	
	net dwellings	electorate	likely dwellings	new electorate
Land at Bull Hill	300	510	589	1001
Swan Centre	0	0	150	255
Food Int'l Site	0	0	214	363
Sorting Office	0	0	95	161

36-69 Randall's Road	0	0	44	75
Potential Additional		510 versus		1855
3 Bookham				
	Quoted		Known	
Local Plan	net dwellings	electorate	likely dwellings	new electorate
Land at Preston Farm	133	226	225	382
Potential Addition				156
4 Dorking				
	Quoted		Known	
Local Plan	net dwellings	electorate	likely dwellings	new electorate
Pixham End, Dorking	138	235	276	469
Land at Regent House	35	80	128	217
Land at Dorking Railway st	0	0	108	183
St Martin's Walk	0	0	15	25
Land next to Deepdene st.	0	0	23	40
Potential Additional		315 versus		934

All the sites are within the Local Plan and bearing in mind that most developers will be keen to pursue their sites, it is inconceivable that the above sites will not be in some development by 2027- some 4-5 years after adoption of the Local Plan.

The potential increase over and above the submission made by Mole Valley District Council in electorate number is 3,018, and this has not been an exhaustive review or included all sites within the Mole Valley proposed Local Plan.

To confirm the logic of above development approach, we have reviewed the Local Plan total delivery annually and the expected dwelling and therefore electorate numbers that will be likely in 2027. Mole Valley District Council submission development numbers from the Local Plan total 1453 new dwellings from 2020 to 2027- a 7-year period. The Local Plan expects to deliver 353 new dwellings per annum, over a 7-year period inclusion of 2,471, equating to an increase of 4200 electors rather than the 2470 shown- a misleading statement by 42%, a considerable margin of error. Even taking a prudent 50% of the additional electorate mention in the sample above, across the main development areas, produces an additional electorate number of 1509 in the north of the district.

The above demonstrates that the submission made by Mole Valley has failed to address in a logically or conclusive manner that the wards will be balanced by being 3 member wards. This is especially the case where the majority of the planned Local Plan development is within the urban area of the north, except for the huge 300% increase in Hookwood, that fails to be mentioned at all.

The above would make the proposed new wards of Leatherhead South, Dorking North & South, Capel, Leigh & Charlwood and potentially the Bookhams with too many electors, against other wards.

In-fill Development

The submission to date makes no adjustment for continued back garden developments, which in the North of the District is on-going and has added considerable to the density in the villages. Bookham,

Fetcham and Ashted would traditionally over a 5-year period see 50-75 new dwellings per village, this would increase electorate numbers by 85 to 130 electors, whilst not significant the addition alongside the Local Plan developments mean that the wards numbers are misleading when considering the elector ratio for the north of the district versus the south and rural villages.

- **It is therefore our submission that the proposal originally submitted by Mole Valley District Council and adopted by the Commission fails in the initial test of Delivering Electoral equality for local voters.**

Residents and Resident Associations Comments

The Mole Valley District Council submission has failed to engage with the communities it serves. Local Councillors are in some cases increasingly concerned by the ward boundaries and across the district there is disquiet about the changes.

General Comments on the Ward patterns:

Ashted:

The reduction by 1 District Councillor in a village that is constantly growing via infill and over spill of development from Epsom and Ewell is hardly sensible, unless other areas are balanced in the same manner

Leatherhead:

Leatherhead Residents are concerned that the whole of the Town Centre and Bull Hill with significant development under Transform Leatherhead, is moving into the Leatherhead South Ward. While the Boundary with Leatherhead North proposed is not a clear or obvious boundary. This unbalances the representation of the town.

The proposals visibly understate the on-going development boom with redevelopment of sites such as ERA International Food site and the Surrey Police HQ to be marketed for residential.

Fetcham:

The reduction to 3 Councillors and the movement of part of the historic centre of the village to a new "Eastwick Park" ward is confusing and the community is angry by this change. An alternative boundary for the ward is attached at appendix 1. In addition, the comments from the Bookham and Fetcham Residents association are attached at Appendix 2, which confirms that lack of understanding of the communities and how the new boundaries fail. There is also a letter from the Fetcham Residents Association attached as Appendix 3

Bookham:

The creation of "The Bookhams" and "Eastwick Ward" is not well received by the community. Bookham North & South worked well with a clearly defined boundary being Lower Road. To balance the North & South, the movement of the boundary around Bookham High Street. Appendix 2 applies for Bookham as well.

Charlwood & Hookwood with Capel, Leigh and Newdigate.:

This is five very different villages and four parishes, including a significant amount of proposed development at Hookwood under the Local Plan. So, a significant challenge to a Councilor Team to represent. Charlwood and Hookwood being very connected to Gatwick and Horley. Which the other villages face either Dorking or Horsham and Reigate.

Mickleham & Westhumble Ward to Ockley & Okewood and including Leith Hill and Westcott.

This really shows very clearly that the approach to Mole Valley does not work. These rural communities include six different parish councils, two unparished villages and have no linking factor or connecting road network. From Leatherhead to the Sussex Border.

Boxhill with Headley and Brockham, Betchworth and Buckland.

Is another rural ward covering five villages, four parish councils and an unparished village. With two on top of Boxhill and three villages on the A25 down in the Valley of the Mole. Headley and to an extent face Leatherhead rather than Dorking.

Dorking North & South:

These appear unchanged, but you will note that there appears to be a discrepancy in the development numbers for the town and the wards against the rural wards will become unbalanced with enhanced development. To expect a major market town to stop growing and developing is unrealistic and likely to be incorrect.

All the above have been made to Conservative Councillors and reflect the concerns that communities have not been listened to.

- **It is clear from the comments and individual comments taken from our Resident's Associations that the second test for the Commission of Reflecting the interests and identities of local communities fails. This is principally due to a lack of public engagement.**

Finally, taking all the above into account, it is clear that the proposal put forward by the Commission and based on the submission from Mole Valley District Council is not going to increase representation and improve Local Government.

Please can we therefore jointly ask you to re-consider the proposed boundaries taking into account the above information, especially regarding incorrect development numbers.

This is the considered opinion of all elected Conservative Councillors and our local political Association and its members.

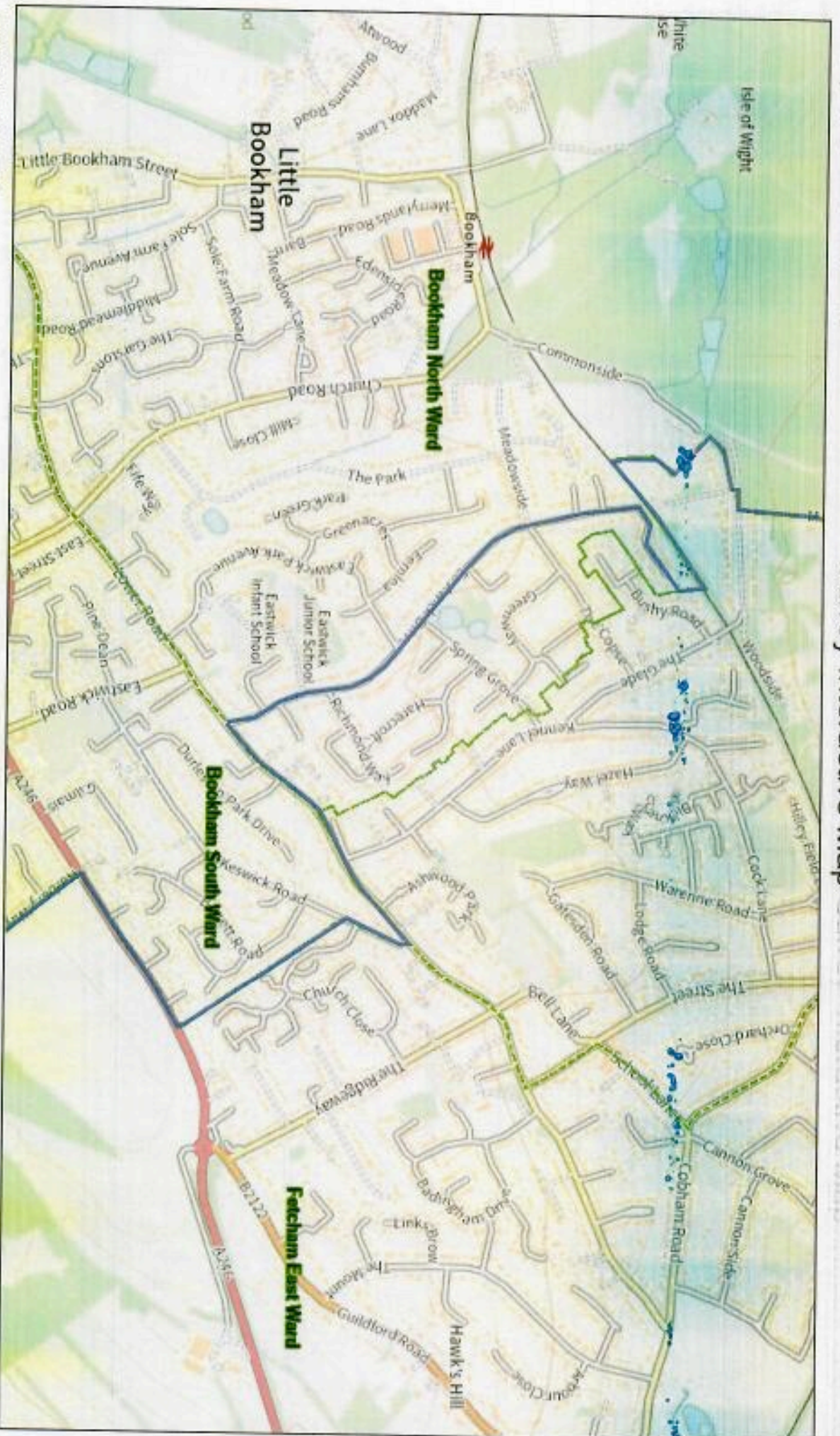
Thank you for considering this information on the local communities.

Yours faithfully

Mole Valley Conservative District Council Group

Appendix 1

Surrey Interactive Map



5/30/2022, 1:41:05 PM

Boundary - Ward

0 0.1 0.2 0.4 mi
0 0.17 0.35 0.7 km

Appendix 2

Commentary from Bookham and Fetcham Residents Association on Proposed Boundary Changes

"A good pattern of wards should: ● Provide good electoral equality, with each councillor representing, as closely as possible, the same number of electors. ● Reflect community interests and identities and include evidence of community links. ● Be based on strong, easily identifiable boundaries. ● Help the council deliver effective and convenient local government.

This review suggests in particular a new ward for Bookham and Fetcham which although reflecting electoral equality fails badly to reflect the community interest and identity as well as using artificial and non-easily identified boundaries.

We originally submitted evidence clearly showing that these two communities are very different with many attributes to demonstrate these. Additional evidence is the tasks these communities and their current Councillors and Residents Associations have been and are engaged on.

In Fetcham over the last years issues such as the complex planning arrangements associated with Tudor Motors in the centre of Fetcham; issues with Fetcham Springs and its future; antisocial behaviour in the centre; youth centre needs.

In Bookham focus has been on the Local Plan and its impact especially combined with developments in the neighbouring District; issues surrounding our local secondary school where 700 Bookham children attend; a new proposed Youth facility in Bookham; road traffic issues at three main thoroughfares; antisocial behaviour in parts of Bookham South.

These facts are submitted as evidence as to why joining parts of these two communities will place unacceptable burdens on any new Councillors in the suggested Eastwick ward as well as leaving residents in this location unsure of which Councillor or Residents Association they should contact in need.

As a solution we would suggest that the warding arrangements for Bookham are based on five Councillors and for Fetcham four. . This would mean no change to the total number of Councillors suggested by the review for Bookham and Fetcham. To achieve this would mean possibly two, two member wards for Fetcham, one three-member ward and one two-member ward for Bookham. It is appreciated that there may be the need to achieve Electoral balance and some dwelling in Bookham may have to be moved in a slightly enlarged Fetcham ward. Although undesirable if this were minimised it would be a better solution to that currently suggested.

Such an outcome would ensure that both "villages", which are in fact small towns with a population of approximately 9000 (Fetcham) and 12000 (Bookham), would continue to have Councillors who would be able to understand more easily the number of major issues that will continue to affect both communities.

Local Government Boundary Commission for England's

Review of Mole Valley District Council Wards.

Fetcham Residents Association response

to the LGBCE Second Stage proposals for

Fetcham & Bookham.

Fetcham – a Village and a Community.

The Fetcham Residents Association's first response to the LGDCE's invitation for suggested Ward boundaries was submitted during December 2021. Then, as now, we consider the interests of the 9000 residents of Fetcham, of whom some 1,022 households are subscribing Members of the FRA.

We enjoy a close working arrangement with our present four District Councillors in considering issues that may be of concern or interest to ALL residents of Fetcham. This is achieved irrespective of the current Fetcham East – Fetcham West ward boundary that bisects the more central residential area as well as our schools, churches and the main modest, but thriving, shopping center at its core. An on-line survey of Fetcham residents, conducted during December 2021, revealed that over 87% of respondents said they felt proud to live in Fetcham, with 96% feeling safe in the village. Excluding pandemic affected 2020 & 2021, our AGM's held in the Village Hall, have for some years now been 'full houses' of 120+ participants ... reflecting a shared interest in local issues that are distinct from those of immediately neighbouring Leatherhead and Bookham.

In our first stage response, we sought to address the stated Ward requirements whilst also attempting to protect the Fetcham community spirit.

Second Stage Response

The three member ward recommendation for a single Fetcham ward and a single Bookham ward (renamed The Bookhams), involves the addition of a third new, Eastwick Park ward, created with populations of existing Fetcham & Bookham residents within arbitrarily drawn boundaries.

Our understanding is that four statutory considerations are required to be given equal weight...

- 1) The need to secure, as nearly as possible, equal ratios of electors to councillors in each ward.
- 2) The need to reflect the identities and interests of local communities and in particular the desirability of fixing boundaries which are easily identifiable and do not break local ties.
- 3) The need to secure effective and convenient local government
- 4) The desirability, for elections by thirds, of securing that number of councillors for each ward is divisible by three where possible, in order to enable voters to participate in annual elections.

The recommendation fails in two of the four counts.

- No regard is given to the identity and interests of two long established and differing communities (Consideration 2) compounded by proposed boundaries that...
 - ... are arbitrarily drawn.
 - ... break local and very practical ties.
 - ... creates a set of residents in an Eastwick Park ward that have no community focus, or arguably the need for one. They may be expected to continue to regard either Fetcham or Bookham village centres as their centres.
 - ... our first response had already stated could not be recommend or supported due to the moving of the westerly Fetcham ward boundary to such close proximity with our village's Junior school and Churches.
- Effective and convenient local government (Consideration 3) will be significantly compromised.
 - In addition to established Resident Associations for the Fetcham & Bookham communities each liaising with their respective three Fetcham or Bookham Ward councillors, BOTH RA's will need to ALSO be liaising with the three Eastwick Park ward councillors.
 - No one set of Ward councillors be able to speak for either all Fetcham or all Bookham residents
 - Eastwick Park ward councillors would need to be addressing the needs of two differing groups and needs of residents.

Instead, disproportionate weighting has been applied to the requirement to satisfy the equality of electoral numbers (Consideration 1) and the desirability for elections by thirds (Consideration 4) ... to the apparent exclusion of the other statutory considerations.

Counter Proposal

The FRA shares with the Bookham Residents Association the view that attempting to consider ONLY the electoral numbers and a one size fits all electoral process applied across all Mole Valley, is not capable of delivering a ward structure across the Fetcham and Bookham communities that will have any meaning, be respected or be workable.

In conjunction with BRA, the FRA proposes an alternative warding arrangement that at least maintains the nine councillors recommended across the two communities.

This would be for two Bookham wards, one of three councillors the other of two councillors. In Fetcham there would be two wards, both of two councillors.

We are open minded as to whether these wards would bisect East/West, or North/South. We would expect the respective Fetcham and Bookham ward councillors to work together for the good of their combined community, not just for the electorate in their own ward.

The key to our proposal is that it would meet all of the Boundary Review principles of "equal ratios of electors to councillors are readily achieved"; "ensure that recommendations reflect Community identity"; "provide arrangements that support effective and convenient Local Government", as well as the "divisible by three" number for the Council as a whole.

As part of our proposal, it is appreciated that to approach electoral equivalence in numbers some properties in Bookham may have to move to the Fetcham wards. As the LG Boundary Commission noted there is an area between both settlements that do merge and it is here that changes could be made.

A map suggesting where these locations are is displayed below and is also provided separately.



The dashed green line is the current West/East ward boundary between the main Fetcham & Bookham residential areas. The blue solid line represents a proposed West/East boundary

In addition to addressing electoral equivalence issues, we believe that the suggested minor amendment would go part way towards returning to the 1994 ward boundary and Fetcham's Ecclesiastical Parish boundary, within that limited area.

There is clear precedent to support the solution we propose. In the recent LGBC review of St Albans, which also has the key determinant of a three yearly cycle of elections, two member and single member wards were agreed because of local circumstances

On behalf of the residents of Fetcham and Bookham, and for the health of our community identity and effectiveness of our local government, we urge the Boundary Commission to adopt our proposal.

Richard Bradfield

Planning Issues – Fetcham Residents Association
4th June 2022

