

Community Governance Review – Final Recommendations for Worth Parish Council (WPC).

REPORT OF: Head of Regulatory Services
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Wards Affected: Copthorne & Worth
Key Decision: No
Report to: Scrutiny Committee for Community, Leisure & Parking
14 September 2022

Purpose of Report

1. Following completion of the second of two public consultations, to summarise for the committee the findings of the second public consultation.
2. To consult the Committee regarding our final recommendations.

Recommendations

3. **The Committee is recommended to:**
 - (i) **Note the findings of the second public consultation.**
 - (ii) **To provide advice upon, and further to that advice, to accept the principal electoral authority's final recommendations for Worth Parish Council.**
 - (iii) **To note that in the light of the consultation responses received through each stage of the Community Governance Review, the final recommendations shall proceed to Council for final decision on 28 September 2022.**
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Background

4. The committee will recall that this Community Governance Review (CGR) was initiated following a valid petition submitted by the requisite number of local registered electors, pursuant to the provisions of Section 80 of the Local Government and Public Involvement in Health Act 2007.
5. The petition called upon this Council to constitute a new Parish Council for the existing Crawley Down parish ward, to be styled as Crawley Down Village Council. The names of the petition organisers are publicly promoted, and they are: Alex Cruickshank, Ian Gibson, Sally Gibson, John Hitchcock and John Plank.
6. At its meeting of 2 February 2022, the Committee advised upon the Terms of Reference and Guidance for Respondents relating to the CGR. The first public consultation opened on 14 February 2022 and closed on 15 April 2022.
7. Members will recall from our Guidance for Respondents, that the first stage of this CGR required consultees to make qualitative submissions that should address the themes explained within the Terms of Reference and/or other matters that we are able consider. We could not consider submissions that merely expressed support or opposition for a particular proposition, or that provided nothing for us to consider.

8. The committee considered the public responses to the first consultation and the resulting draft recommendations at its meeting of 25 May 2022. The second public consultation opened on 13 June 2022 and closed on 15 August 2022.
9. The original close date for the second public consultation was 1 August. When it became clear that the appointed auditor's financial assessment report would not be published by WPC until 22 July, your officers extended the public consultation to close 15 August to allow a reasonable period for residents to consider it and respond.
10. The second public consultation was specifically regarding our draft recommendations that resulted from the first public consultation, so we anticipated that submissions would mostly be confined to those, unless suggesting an entirely different proposition.

Public Engagement relating to the second public consultation

11. Each eligible elector was sent a letter or an email explaining the draft recommendations arising from the first stage of the CGR, signposting to the consultation material published at the Council's website. This explained how to contribute to the Review. The communication also provided electors with their unique Elector Number, to be quoted with their submission to enable our electoral services team to verify that all individual responses came from registered local government electors of the Worth Parish Council area.
12. When your officers extended the second public consultation to 15 August as explained at paragraph 9 of this report, each eligible elector was sent a further letter or an email to give notice of the extension, the reason for it and signposting to the auditor's financial assessment report, published at MSDC's and WPC's websites.
13. Although a qualitative Review, for the Committee's contextual information, at this second stage we received 296 submissions that were acceptable. Of these 195 were garnered by the petitioners and delivered in bulk by way of two drops by-hand to the Council on 10 and 15 August. Of the 195 harvested responses 15 were rejected: 13 because they were not registered electors, and 2 because they were residents of a different parish that is not the subject of this CGR.
14. These submissions were designed to have personal details written into a space provided and to be signed and dated by an elector. Each template type contained identical wording opposing the draft recommendations, each was enveloped, and affixed upon each envelope was an identical printed address label. We received 17 template varieties and the number of each type was follows:

Template Type	No. Received	Template Type	No. Received	Template Type	No. Received	Template Type	No. Received
A	2	F	30	K	1	P	3
B	3	G	20	L	1	Q	7
C	29	H	55	M	1		
D	10	I	5	N	5	TOTAL	180
E	5	J	1	O	2		

15. We received from Crawley Down electors, complaints of letters being harvested in the village High Street, and via leaflet drops to resident's homes. A few complaints were received by telephone and x1 was via email attaching the petitioner's leaflet – This leaflet is attached at appendix 1 to this report for the committee's information.

16. The written complaint received via email read as follows:

"I have previously been asked to submit my views for the setting up of a new Parish Council for Crawley Down Village. My two previous responses strongly objected to this proposal on a cost and benefits basis. Again, I have been asked to submit my thoughts and views by having a flyer put through my letterbox, copy herewith titled 'Crawley Down is being held Prisoner' which I consider to be totally unprofessional. I personally agree with the views of both Mid Sussex District Council and Worth Parish Council and welcome a swift decision to bring this governance review to a conclusion stopping persistent campaigners wasting resident's time by asking them to resubmit views and opinions on this matter."

17. The number of responses appearing to be submitted by electors themselves was therefore 116. Of these, 56 supported the draft recommendations and 60 did not. Therefore, the overall numerical analysis of 56 for and 240 against is skewed by the number of template letters that were gathered and delivered to MSDC. It is unclear what the purpose of this activity was, given that a CGR is not a poll, it is a qualitative Review, and this authority has been repeatedly clear about that, from the beginning.

Draft Recommendations

18. The draft recommendations of the principal electoral authority were as follows:

- (a) The case for division of assets and liabilities at reasonable cost is not sufficiently made. At this time of cost-of-living crisis, many electors are not agreeable to this.
- (b) At an early stage of the second public consultation, WPC and the petitioners should supply to this Review their assessment of these division costs with evidential annotations for each cost, so that MSDC may see how they have been arrived at.
- (c) The indicative annual budget proposed by 'The Local Councillors and Residents Supporting the Creation of a Crawley Down Village Council', is disputed by WPC. MSDC wishes to see an adjusted and agreed version as soon as possible.
- (d) The WPC governance review working party and subsequent changes are noted. WPC should carefully consider ongoing elector concerns relating to the accessibility of Council meetings and perhaps consider alternating these between The Parish Hub and the Haven Centre, given that virtual/hybrid meetings legislation is not yet in view.
- (e) The WPC could seek to encourage more local people to stand for election both in Cophorne and in Crawley Down. It may help to produce a 'Becoming a Councillor' brochure that explains the duties and rewarding nature of the role, and to publish this at the Parish Council's website. Councillors and other activists too should encourage greater levels of candidate nomination in 2023 such that elections are contested in both areas.
- (f) The current governance arrangements for the Worth Parish Council should continue, and this Authority (MSDC) should consider afresh a CGR in 2025 or 2029 dependent on build out of any permitted developments affecting Cophorne West and surrounding areas.

- (g) The existing Parish Council size is 17, comprised of 9 Councillors for the Crawley Down Ward and 8 Councillors for the Copthorne Ward. The current electorate of Crawley Down Parish Ward is 4547 and of Copthorne Parish Ward is 4066. We are therefore not recommending change to Councillor numbers for either ward at this stage of the Review.
- (h) The name of the Parish Council should be changed to Crawley Down and Copthorne Parish Council, to better reflect the joint and shared community identity.

Second Public Consultation Findings

19. Your Officers have evaluated all eligible submissions that were received during the second public consultation, and we present the findings below:
20. Having had the benefit of reading the revised financial analysis of both entities via social media, websites, and the published report of Mulberry & Co - Of the 56 submissions in support of our draft recommendations most remained concerned about the cost of dividing the WPC, the increased ongoing cost to taxpayers of two parish councils instead of one, and they were not persuaded of the benefits of the division given the village specific committees and working parties that already exist.
21. Several residents of both villages strongly felt that during a cost-of-living crisis with mortgages, fuel, utility, and food prices rising, potentially for a prolonged period, that now is not the time to create additional governance cost burdens for taxpayers.
22. A Crawley Down elector summarised the issues as follows:

“A Parish Council runs services such as allotments and awards local grants. It advises on planning and highways. It is the smallest tier of local government nearest to residents. To reorganise Worth Parish Council into two parishes will cost, according to those who support it (who seem to focus purely on the costs for Crawley Down and not the whole Council) tens of thousands of pounds or more than £100,000 according to the Parish Council. These are unjustifiable sums, particularly in the current economic climate. The suggestion is financial madness.

All the current Copthorne Ward members of WPC oppose reorganising the Parish. About 2/3rds of the Crawley Down members oppose it. This is because it is a bad idea.

The way forward should be to create a structure which allows committees for both villages which come under a central umbrella of WPC. That way you enjoy the benefit of closeness on issues such as cutting grass but have the weight of the residents of both villages when it comes to views on consultations. If need be, some meetings should be held in Crawley Down so villagers there feel included (although don't think this happened the other way when WPC was based in Crawley Down).

I think renaming it is an unnecessary cost but if it makes those promoting a split between both villages feel better, I would be happy to go along with it!

Please can we now get rid of this division, agree WPC stays together and allow it (whether a WPC or CD&CPC) to get on with serving residents in a challenging time.”

23. In view of the very high level of campaigning that has occurred in Crawley Down and with the benefit of the revised financial analysis – Of the 240 submissions opposing our draft recommendations most advanced a separate community identity (which is evidently felt by many in the village), self-governance and better local democracy as well as having the proposed CDVC located within the village. Some felt that these benefits must be realised now, whatever the cost.
24. Several residents did not feel that the existing arrangements worked well for Crawley Down and argued that they favour Copthorne. Many of these also highlighted what they see as very distinct characteristics and identities of the two villages.
25. A Crawley Down elector, resident in the village for 48 years, wrote as follows:

“I was very surprised to learn that the village's request to have its own council was rejected. The village has grown significantly over the decades and must rival Copthorne in size. They are two completely separate villages, with differing needs, so it makes complete sense to me that Crawley Down's interests are looked after by Crawley Down people. As I understand the numbers, this is the overwhelming will of the residents.

Of course, there are costs involved in a separation, but these should not be an obstacle. To my mind, such costs should be amortised over say 10 years. There seems to be a lack of evidence for such costs being estimated at £150K by Mid Sussex, whereas the local view is far lower at £32K.”
26. A factual correction on division costs ‘being estimated at £150k by Mid Sussex’. That was as Members will know, the estimate of WPC not of Mid Sussex District Council.
27. The submissions of WPC Cllrs. Mayor and Casella are recommended reading and refer to work that WPC is doing relating to youth facilities and services, CCTV provision, dealing with speeding vehicles and anti-social behaviour. They point out that these are the priorities of residents of both villages and are being delivered largely because of the economies of scale that WPC is able to achieve and they are concerned that such important projects may be compromised by the proposed division. They also refer to the campaign activities that have been undertaken by the petitioners and what they see as the misquoting of facts and damaging community cohesion. (This is addressed at paragraphs 33 to 38 of this report).
28. Cllr. Scott represents Crawley Down and is vice Chair of the Council. He notes that the petitioners are very critical of MSDC’s draft recommendations and having listened to local representations, particularly those supporting the division, he concludes that the “extra costs, disruption and likely poorer Council services that would result from a split cannot be justified” and he says “the original reasons for proposing a separate CDVC have been discredited, namely solving the Royal Oak issue, having a Parish Office and meetings in the village when the parish hub in Copthorne is easily accessible and electronic communication is becoming the norm.”
29. Cllr. Hodsdon who is chair of WPC’s HR committee has submitted an interesting perspective. He believes residents to be disengaged from this process which he says they consider has gone on too long, has wasted too much money already and that resident’s views are the same as were offered during the first consultation. He finds the campaign activities of the petitioners to be disturbing, disingenuous and now lacking credibility. He asserts that their desires are not representative of Crawley Down as a whole and that resident’s financial concerns are now worse than before.

30. Cllr. Gibson, not as a petitioner but as an individual, has submitted that the first public consultation “had three significant flaws and the Council must reconsider its main recommendation that the status quo be maintained”. He considers those flaws to be: “the insistence on qualitative submissions”, “inconsistent and unsubstantiated claims on costs”, and “giving equal weight to the views of Cophorne residents”.

(a) **‘Insistence on qualitative submissions’** – Cllr. Gibson repeats a debate which he held with officers before the CGR. He very much wanted a quantitative element to the process and has always advanced the Hextable CGR as a model of good practice, as conducted by Sevenoaks District Council.

Your officer’s view: Section 93 of the 2007 Act allows principal councils to decide how to undertake a CGR if they comply with the duties of the Act applying to councils undertaking reviews – and your officers consider that we have done so.

(b) **‘Inconsistent and unsubstantiated claims on costs’** – Cllr. Gibson asserts that WPC abandoned any pretence of maintaining a neutral / facts only position as advised by WSALC. He claims that the WPC’s unverified £150k figure has had a catastrophic effect on the debate and undermined the first consultation. He further states that MSDC is equally culpable for not recognising this and not insisting that WPC provide evidence or publicly withdraw the figure.

Your officer’s view: We note that neither entity has maintained a neutral / facts only position on some aspects of this process. Though we are aware of all the claims made by both entities throughout the Review period, it is not for the principal electoral authority to seek to regulate ‘campaigns’ or to intervene on claims and counterclaims whilst the Review is in progress - so we have not done so. If we had, entities would have been contacted by your officers on a very regular basis.

(c) **‘Giving equal weight to the views of Cophorne residents’** – In this section Cllr. Gibson (1) presents the petition as calling for a CGR in the way that Crawley Down is represented in local government, and (2) states that MSDC is acting differently to other CGRs and he quotes the Hextable example, referring to it as a ‘vote’ and praising the Sevenoaks District Council for not giving equal weight to views of the majority, but instead weighting the response of those seeking a division.

Your officer’s view: (1) As a matter of fact the petition called specifically and unambiguously for the creation of a parish council for Crawley Down, and in the event of a positive outcome to constitute a new parish council ahead of the May 2023 local government elections. According to the 2007 Act it will remain open to this principal electoral authority to make a recommendation which is different to that which the petitioners wished the Review to make.

Your officer’s view: (2) We are conducting CGRs in Mid Sussex differently to those in Sevenoaks as Section 93 of the 2007 Act allows us to do. Each Review being undertaken in Mid Sussex benefits from a consistent approach. When the proposal, as in this case, is for one area to effectively leave another and to create two separate parish councils where there is currently one - your officers consider that consulting and giving equal weight to all in the parish, is the right approach. If this were not a CGR, but instead a parish poll, each elector’s vote would have equal value, irrespective of where in the parish they live.

31. Sally Gibson submitted an interesting letter to the second consultation which makes a range of detailed observations, claiming that our communications to electors and our draft recommendations report to this committee, give rise to a loss of confidence in the CGR process. She likens our guidance to respondents to a requirement for “electors to write a higher education essay” and alleges that it was “framed to exclude the effective participation of Crawley Down residents”. She questions the independence of the Auditor’s report commissioned by WPC and further alleges that this principal electoral authority failed to maintain a neutral and impartial position because of our communications and because we published the Mulberry & Co report at MSDC’s CGR webpage. She also refers to the enclosure of a WPC flyer circulated within MSDC’s first CGR communication to electors.

Your officer’s view: The communications to electors of this principal electoral authority and our reports to this committee have been punctiliously prepared to instil confidence in the process, and notwithstanding Mrs. Gibson’s view of the quality our draft recommendations report, we see no evidence to support a claim of such outputs being anything other than factual and impartial. The claim that residents were “not up to the task” of preparing for themselves qualitative CGR submissions is also not evidenced owing to the number of such that were received and published following both stages of public consultation. WPC’s commissioning of Mulberry & Co to conduct independent examination of, and to report upon division costs and the ongoing cost of two separate parish councils is a matter for WPC Councillors. We have made no comment on that decision publicly or otherwise. Once the report was available and had been presented to the parish council, we asked WPC to publish it without delay. Conscious that this was much later than our draft recommendations envisaged and required, we published it also, so that it would sit alongside other reference material at our CGR webpage for the benefit of electors. We entitled it ‘WPC Auditor’s Report (Mulberry & Co)’ to be clear as to what it is and to make clear that it was not an MSDC document. We know that the petitioner’s information on division costs and the ongoing cost of two separate parish councils has benefitted from much promotion on social media and elsewhere. In referring to the parish council’s flyer enclosed with our first communication, Mrs. Gibson omits to mention that in the interest of balance we also enclosed the petitioner’s flyer, and that we enclosed both flyers without charge to the petitioners or the parish council.

32. The full set of accepted submissions is published and represents a background paper, for committee members to peruse. A link is provided at the end of this report.

Campaigns and presentation of certain facts

33. As stated earlier in this report, it is not for the principal electoral authority to seek to regulate ‘campaigns’ or to intervene on claims and counterclaims whilst the Review is in progress and several respondents have expressed disappointment that MSDC did not do so. Now that the Review period has ended, we can as a matter of public record refer to some of the claims made by each campaign entity, as follows:
34. It is evident from many elector submissions, and from the garnered template submissions that certain messages variously conveyed by the petitioners, including at their Facebook page ‘Crawley Down Parish Council Petition’, have proved unhelpful.
35. Firstly, that Crawley Down ‘voted’ 4 to 1 in favour at the first public consultation. That is incorrect because: a) there hasn’t been a vote of any kind, and b) of 250 submissions 61% were from Crawley Down, that equates to 152. Of those, 77% supported the creation of CDVC, that is 117. Of the CD electorate of 4547 that’s about 2.6%. The 4 to 1 depiction therefore appears to have misled some people.

36. Secondly, that at the first public consultation the Review disregarded 10% of the responses because it considered that the views of the residents concerned gave nothing to consider. This is also incorrect for the following reasons: a) our guidance for respondents made clear that very brief statements of support or opposition for any proposition would be rejected as would any submission that was so brief as to provide nothing for us to consider b) the 34 rejected submissions fell into that pre-advised category, but all were carefully considered, they had to be if they were to be rejected. Simply, we did not and could not disregard or ignore any submissions. The 34 rejected submissions are shown at Appendix 2 of this report for Members of the committee and for public information. This demonstrates that these submissions were considered and correctly rejected in accordance with the guidance that we published.
37. The WPC did initially estimate the cost of division to be c.£150k and they publicised this via their initial flyer to all residents. At that time an evidential breakdown of how this cost was arrived at was not available. This Review considers it was unwise to make that claim without the benefit of such information, however we note that it has since been provided via the WPC website entitled 'WPC Definitive Figures for the Anticipated Cost of a Division'. This document revises the assessment to c.£91k, though we note that because of potential HR outcomes, which cannot yet be known, the WPC considers that the cost of division could yet approach their original estimate.
38. The WPC estimated cost of division has been revised to c.£91k. Within the breakdown of this cost is the sum of £13,330 described as '2 x public mail shots', which oddly is the postage cost for MSDCs x3 mailings. We do query therefore what this cost is. If it is in contemplation of future WPC mailings regarding division, that is perhaps an unfortunate coincidence. If it refers to any element of MSDCs administrative CGR costs, then it should not have been included as we previously advised both campaign entities that we do not intend to pass on administrative costs associated with conducting the Review.

Cost of division and annual ongoing costs

39. Following the first public consultation where the cost of division and the ongoing cost of two separate parish councils were of considerable public concern, our draft recommendations on these matters were as follows:
 - (a) At an early stage of the second public consultation WPC and the petitioners should supply to this Review their assessment of these division costs with evidential annotations for each cost, so that MSDC may see how they have been arrived at.
 - (b) The indicative annual budget proposed by 'The Local Councillors and Residents Supporting the Creation of a Crawley Down Village Council' it seems, is disputed by WPC. MSDC wishes to see an adjusted and agreed version as soon as possible.
40. The Petitioners have supplied detailed financial analysis on both matters to this Review and by direct emails to this committee on 6 June, 19 July, and 22 July 2022.
41. The WPC commissioned and supplied to this Review the financial assessment report of Mulberry & Co, and further information has been published at its website. The Chairman of WPC, Cllr. Dorey wrote directly to this committee on 25 July 2022.
42. There is much detail in both submissions and several revisions have occurred so for the committee's convenience your officers endeavour to summarise the latest indications as follows:

	Petitioners	Auditor's Report	WPC
Estimated Cost of Division.	c.£32k	c.£50 – 60k	c.£91k
Combined annual cost of x2 parish councils instead of x1 (Estimates).	c.£40k	c.£51.5	c.£60k
Source:	Petitioner's Submission	Auditors Report	WPC website

43. The Petitioners extended their analysis to include the difference if WPC were to make the same improvements in services that the Petitioners propose (i.e. open an office in Crawley Down and hold meetings there). Based on equivalent level of service, their estimated increased in annual operating costs of two councils over one is £3,252.
44. The above are not absolute figures but are the best estimates that the parties can provide given that there are too many variable outcomes depending on for example whether a division would result in any staff redundancies which at this stage, without the benefit of staff consultation, cannot be known. Most participants and stakeholders agree that this is a key unknown factor, though the petitioners do not consider that redundancies are inevitable. There are also cost details within the proposed budgets that remain disputed but the gap between them has narrowed to the extent that they can be seen as acceptable.

Conclusions

45. Wherever on this spectrum of estimates the actual costs would turn out to be, having regard to both public consultations and considering all submissions, your officers consider at this time of cost-of-living crisis, mostly, electors would not currently support a division of WPC and the creation of a new parish council for Crawley Down.
46. Your officers must have regard to the interests, and priorities of both Copthorne and Crawley Down, and we do not consider that the proposition together with the high costs to the public purse, would serve the interests of both communities at this time.
47. This Review, however, does fully acknowledge and respect the strong sense of community identity felt in Crawley Down, together with the aspirations of many for tailored governance arrangements that might provide for a more localised sense of scrutiny, accountability, and potentially enhanced local democracy.
48. The local debate remains polarised, and although those in favour make an understandable community identity case, the methods employed have resembled an election campaign rather than a CGR and this has not had a positive impact on community cohesion.
49. Your officers acknowledge that this view will disappoint the petitioners and supporters of a separate parish council for Crawley Down now, but we observe that local government elections in May 2023 might provide an opportunity for those in Crawley Down who strongly support this aim, to seek election to the WPC on such a platform.
50. This Review has evaluated and carefully considered all valid submissions received. Having regard to these it is considered that the final recommendations of the principal electoral authority should be as follows:

Final Recommendations for Worth Parish Council

51. The case made for division of assets and liabilities at reasonable cost is not acceptable. At this time of constant price inflation and whilst there is predicted to be a prolonged cost-of-living crisis, many electors are not agreeable to this.
52. **Improved Community Engagement** - The WPC governance review working party, area focussed committees and subsequent changes are noted. WPC should carefully consider ongoing elector concerns relating to the accessibility of Council meetings and perhaps consider alternating these between The Parish Hub and the Haven Centre, given that virtual/hybrid meetings legislation is not yet in view.
53. **Better Local Democracy** - The WPC could seek to encourage more local people to stand for election both in Copthorne and in Crawley Down. It may help to produce a 'Becoming a Councillor' brochure that explains the duties and rewarding nature of the role, and to publish this at the Parish Council's website. Councillors, other activists, and stakeholders should also encourage greater levels of candidate nomination in 2023 such that elections are contested in both areas.
54. **Effective and Convenient Delivery of Local Services and Local Government** - The current governance arrangements for the Worth Parish Council should continue, and this authority (MSDC) should consider afresh a CGR in 2025 or 2029 dependent on build out of any permitted developments affecting Copthorne West and surrounding areas.
55. The existing Parish Council size is 17 comprised of 9 Councillors for the Crawley Down Ward and 8 Councillors for the Copthorne Ward. The current electorate of Crawley Down Parish Ward is 4547 and of Copthorne Parish Ward is 4066. We are therefore not recommending any change to Councillor numbers for either ward.
56. The name of the Parish Council should remain, Worth Parish Council, a) because it is an understandable and established descriptor of the two areas together 2) given public concern about costs, renaming and rebranding the parish council at this time may seem indulgent, particularly whilst there is the prospect of a future CGR.
57. **Reflecting the Identities and Interests of the Community** – Residents of Crawley Down and their elected representatives could consider setting up a Community Forum as a step toward a longer-term aim. A Community Forum can be set up by the principal council or created by residents to act as a mechanism to give the community a say on principal council matters or local issues. They increase participation and consultation, aiming to influence decision making, rather than having powers to implement services. They vary in size, purpose, and impact, but membership usually consists of people working or living in a specific area. Some forums also include ward councillors, and representatives from the council and relevant stakeholders can attend meetings. If this is of interest to local people, MSDC's Community Engagement team could be approached to assist with this project.

Policy Context

58. The petition process allows for local views to be considered when considering community representation at Parish level.

Other Options Considered

59. Renaming the existing parish council to Crawley Down & Copthorne Parish Council was considered. Some public respondents indicated that this would not be acceptable unless the villages appeared in the name alphabetically i.e: the other way around, whilst others have strongly opposed potential loss of the Worth Parish name.

Financial Implications

60. None.

Risk Management Implications

61. The present parish arrangement has in the main led to sound community governance and there is every reason to expect this should continue, with the existing parish council making further governance improvements wherever these are possible.

Equality and Customer Service Implications

62. All stakeholders and registered electors were consulted in two public consultations.

Other Material Implications

63. At the conclusion of any CGR and following adoption in Council, the Council's Legal Services Division would be required to make Community Governance Orders, if there is to be a change. Considering the final recommendations this will not prove necessary.

Sustainability Implications

64. A key aim of any Community Governance Review is to alight upon suitable Governance and Electoral arrangements that are capable of enduring. There is little or no environmental impact.

Background Papers

[Government & Local Government Boundary Commission Guidance on Community Governance Reviews.](#)

[Link to second public consultation responses](#)

[Link to second public consultation response of the Petitioners](#)

Enc.

Appendix 1 – The Petitioner's leaflet – Ref. paragraph 15

Appendix 2 – Submissions rejected at the first public consultation – Ref. paragraph 36