

Appendix 2

Tonbridge & Malling Borough Council

Council Submission on the consultation on the Local Government Boundary Commission for England's draft recommendations on the proposed warding pattern arrangements for the Borough of Tonbridge and Malling.

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1. Introduction

- 1.1 Tonbridge & Malling Borough Council welcomes the opportunity to comment on the draft recommendations of the Local Government Boundary Commission for England (LGBCE) in the proposed warding pattern arrangements for the borough.
- 1.2 The submission has been prepared through the General Purposes Committee, with a Special Meeting of the Full Council convening on 07 December 2021 to consider and approve this document.
- 1.3 This document sets out the Council's view that whilst the Council's 'key principles' and 'building blocks' (as set out in its submission) have been largely adhered to, and that most of the wards proposed in the LGBCE submission are either the same as the Council submission or are deemed acceptable, there are a few elements of the proposals that the Council believes should be amended in order to better meet the three statutory criteria.

2. Overview of the Council's Response

- 2.1 This document is the formal response regarding the draft recommendations on the new warding pattern arrangements for Tonbridge and Malling set out by the Local Government Boundary Commission for England.
- 2.2 We acknowledge the need to adhere to the three statutory criteria and recognise that the importance of setting boundaries that do not break local ties and the need to provide effective and convenient local government carry equal weight to the need to deliver electoral equality for voters.
- 2.3 Although much of the draft proposals set out by the LGBCE do differ from the Council submission to the consultation, we accept the majority of the proposals put forward by the LGBCE as they still meet almost all of the 'key local criteria' set out in the Council submission. This includes:
- The parish boundaries being respected where at all possible.
 - The creation of self-contained wards across a number of our communities, representing their strong local identities. This is particularly the case with settlements such as Kings Hill, Snodland and Larkfield. There is also an acknowledgement of the strong relationship between Tonbridge and Hildenborough and the creation of a self-contained cluster of wards made up from this area.
 - The keeping together of a number of parished areas that have a close relationship, either in wards by themselves or kept together within larger wards for the purposes of electoral equality – this includes Borough Green and Platt; Birling and Ryarsh (Birling, Leybourne and Ryarsh); Addington and Trottiscliffe (Pilgrims with Ightham); Burham and Wouldham (Aylesford North with Burham, Eccles and Wouldham) and Mereworth and Wateringbury (East Peckham, Mereworth and Wateringbury).
 - The agreement that 'Ightham, Wrotham and Stansted' has a coherent identity that looks more towards Addington and Trottiscliffe than it does towards Borough Green, Platt or Plaxtol (hence the creation of Pilgrims with Ightham ward)
 - The agreement that East Malling being paired up with either Kings Hill or Ditton would not form a coherent identity (hence East Malling forming a ward with West Malling and Offham ward).
 - The agreement that Wateringbury being linked to Kings Hill does not make sense from a community identity perspective (hence the creation of East Peckham, Mereworth and Wateringbury ward)
 - The agreement that the area along the border between Ditton and South Aylesford forms less of a community divide and could therefore be flexed to

accommodate a future warding pattern (hence the creation of Aylesford South and Ditton ward)

- Agreement that Ryarsh and Birling have stronger links to Leybourne than they do with Snodland (hence the creation of Birling, Leybourne and Ryarsh ward).

2.4 In addition, the LGBCE proposals also clearly take a very similar approach to establishing 'building blocks' within the borough as a starting point for the warding patterns. The key difference being the decision to allocate 14 councillors instead of 13 to the 'Tonbridge and Hildenborough' block, which has led to a pattern based on 44 councillors rather than 43, and the move away from establishing Larkfield and East Malling as a block. However, these changes are accepted by the Council in the interests of electoral equality and in establishing a warding pattern based on 44 councillors.

2.5 Despite the above, there are some aspects of the LGBCE draft proposals that we do not agree with, most notably:

- The warding patterns in south and central Tonbridge (particularly in relation to Judd ward) do not represent coherent identities and the loss of the High Street as a natural barrier between wards should be reconsidered.
- The naming of a small number of wards is overly long and appears contradictory to the advice provided by the LGBCE on keeping ward names short and clear.

2.6 In addition to the above, the Council also feels that the proposed warding pattern on the East Bank is likely to lead to a further review shortly after 2027. This is because the variance for this ward under the proposed plans will be +8.3% by 2027, and this does not consider the likely impact of development around Eccles, which as things stand does not have planning permission but could ultimately start as early as 2024/25. As such, a further review could be triggered sometime in the late 2020s due to electoral imbalance in this ward. However, we realise that in order to meet the three statutory criteria on the East Bank with 44 councillors covering the borough, this is ultimately the best outcome for the timeframe of this review.

2.7 The LGBCE has proposed 19 wards served by 44 councillors. A summary of the LGBCE wards, and the Borough Council's position in relation to these wards, is set out below in Table 1:

Proposed Ward	Comparison to TMBC Proposal	Summary of TMBC Position
Judd	Change from TMBC Submission	Do not support this proposal because: i) At its full extent, it does not represent a cohesive identity within Tonbridge. ii) It ignores the impact of the High Street, which has been a well-established boundary for decades.
Cage Green	Change from TMBC Submission	In order to address the above issues, it would make greater sense for Cage Green to be extended into Central Tonbridge, east of the High Street, to create a ward with a stronger identity.
Vauxhall	Change from TMBC Submission	Satisfied with the proposal.
Higham	Change from TMBC Submission	Satisfied with the proposal.
Trench	Change from TMBC Submission	Satisfied with the proposal.
Hildenborough	Change from TMBC Submission	Satisfied with the proposal. It recognises the fluidity along the existing Hildenborough/Castle ward boundary even if the proposals differ from the Council's.
Bourne	Same as TMBC Submission	Support the Proposed Ward
East Peckham, Mereworth and Wateringbury	Change from TMBC Submission	Satisfied with the proposal. Fundamentally represents the merger of two 1-member wards in the TMBC proposal and keeps Mereworth and Wateringbury together.
Borough Green and Platt	Same as TMBC Submission	Support the Proposed Ward
Pilgrims with Ightham	Same as TMBC Submission	Support the Proposed Ward
Kings Hill	Change from TMBC Submission	Satisfied with the proposal as it ensures Kings Hill is self-contained.
East Malling, West Malling and Offham	Change from TMBC Submission	Satisfied with the proposal as it accords with the key principle of East Malling not being put in the same ward as Kings Hill or Ditton.
Birling, Leybourne and Ryarsh	Change from TMBC Submission	Satisfied with the proposal as it keeps Birling and Ryarsh together.

Snodland West and Holborough Lakes	Same as TMBC Submission	Support the Proposed Ward
Snodland East and Ham Hill	Same as TMBC Submission	Support the Proposed Ward
Larkfield	Change from TMBC Submission	Satisfied with the proposal as it is very similar to the TMBC submission and ensures Larkfield is self-contained.
Aylesford South and Ditton	Change from TMBC Submission	Satisfied with the proposal as it agrees with our 'key local criteria' that there is scope for flexibility on the boundary between Aylesford South and Ditton.
Aylesford North with Burham, Eccles and Wouldham	Change from TMBC Submission	Reluctantly accept the proposal as it keeps Burham and Wouldham together. However, the Council's proposed layout on the East Bank with 43 councillors provided a more satisfactory warding pattern than with 44 councillors.
Walderslade	Change from TMBC Submission	Reluctantly accept proposal.

Table 1: Overview of the Borough Council's Response to the Proposed Warding Pattern.

- 2.8 Given the above, the Borough Council has focussed its response to this round of consultation on the key area where it believes that the warding pattern for the borough could be improved, namely creating a warding pattern in South and central Tonbridge that better represents community identity whilst at the same time respecting electoral equality and provide effective and convenient local government (See Section 3).
- 2.9 In addition, the Council has also put forward an alternative ward name for 'Aylesford North with Burham, Eccles and Wouldham' and highlighted others where the ward name is accepted, but flagged up as being a little cumbersome (See Section 4).
- 2.10 Tonbridge & Malling Borough Council commend this response to the LGBCE for their consideration.

3. Warding Patterns in Tonbridge

3.1 In the Council's submission during the last round of consultation, a proposal for Tonbridge and Hildenborough was put forward based on 13 councillors. This proposed warding pattern is set out below in Table 2:

Name of ward	Number of Cllrs	Electorate 2021	Variance 2021	Electorate 2027	Variance 2027
Tonbridge North East	2	5,089	11%	5,454	10%
Tonbridge North West	2	5,054	11%	5,413	9%
Tonbridge East	3	6,779	-1%	7,212	-3%
Tonbridge South	3	7,722	13%	8,137	9%
Hildenborough and Tonbridge West	3	6,629	-3%	7,093	-5%
TOTAL	13			33,309	

Table 2: Initial Council Proposals for Tonbridge and Hildenborough

3.2 However, the draft proposed warding pattern for Tonbridge and Hildenborough that has been published is much different, and is also based on 14 councillors. Having looked through the LGBCE report, the Council is of the view that it is able to accept a pattern based on 14 councillors and that the warding pattern for much of Tonbridge and Hildenborough does adequately meet the 3 statutory criteria. Despite this, the Council does have very real concerns about the proposed layout for south and central Tonbridge for the following reasons:

- The creation of a 'Judd' ward that covers such a wide area does not adequately represent our communities. In addition, the use of the name 'Judd' ignores the fact that it is a term that currently relates to the south-west corner of the town, and does not adequately describe the vast swathe of the town that the ward is proposed to cover.
- The use of the main High Street as an obvious boundary within the town, which has been used for decades appears to have been ignored. At the same time the lower end of the High Street (Quarry Hill Parade) has been used as a boundary between the proposed Judd and Vauxhall wards (albeit it is acknowledged that both sides of this service centre have been placed in the same ward). This approach feels inconsistent.

3.3 It is therefore proposed that an alternative approach is taken to south and central Tonbridge, that better represents communities, whilst also ensuring electoral equality and effective and convenient local government.

3.4 Our proposed approach would see the retention of the proposed Vauxhall ward as it is currently proposed, with the railway line representing the northern boundary and the western boundary with Judd ward following existing lines albeit with Quarry Hill

Parade itself moving in to Judd ward. However, in our proposals, Judd ward would stretch north into the existing castle ward (as it currently does) but not extend eastwards beyond the High Street. Instead, Cage Green, which already includes a sizeable portion to the east of the Shipbourne Road, would extend south into this area (See Appendix 1)

- 3.5 There are many benefits to this amendment that can be clearly seen when considering the three statutory criteria.
- 3.6 For a start, this proposal does create an improvement on electoral equality. Indeed, it results in a variance of 3.5% on a two-councillor Judd ward, and a 0.1% variance on a three-councillor Cage Green ward, whilst the existing LGBCE proposals create a three-councillor Judd ward with a variance of 4.6%, and a two-councillor Cage Green ward with a variance of 3.5% (See Appendix 2).
- 3.7 In terms of community identity, whilst it is acknowledged that there are community links between the existing Judd ward and the area directly to the north (west of the High Street), the rationale for extending eastwards of the High Street on the basis of joint concerns around flooding is felt to be much weaker. This is especially the case as the Tonbridge Racecourse Sportsground acts as a natural flood plain for the area west of the High Street, whereas individual property flood resilience is the main mitigation measure to the east. This reinforces the fact that the High Street is an established boundary, that has been used for decades, and this is because it does represent an obvious juncture in the town.
- 3.8 Also, it is worth noting that as well as the links between the existing Judd ward and the area east of the High Street being relatively weak, the characters of the two areas are quite different as well. The vast majority of the area around the railway line comprises terraced housing built from the late 1800s onwards, with further suburban growth in the south in the second half of the twentieth century. In contrast, the area to the east of the High Street comprises a mixture of some of the oldest parts of the town (for example, at the Bordyke) and recent flatted residential development along the river.
- 3.9 In contrast there are stronger links between this area to the east of the High Street and Cage Green, with the current proposed boundary between the two relatively arbitrary (the arbitrary nature of the current boundary is clearly illustrated by the fact that Mill Stream Place and Brook Lane, which are in different proposed wards, are part of the same development and share a private footpath between both roads). Indeed, the A26 (and to some extent Shipbourne Road) create a central focus for this expanded ward, just as the LGBCE draft proposals state Pembury Road does for Vauxhall ward.

- 3.10 In addition, it is clear that Cage Green ward as it stands is a predominantly residential area without many facilities that represent a core focus for the ward. This is unlike a number of other proposed wards in Tonbridge, such as Higham (with Martin Hardie Way), Trench (York Parade) and Judd (Quarry Hill Parade). The expansion of the ward into the area east of the High Street would make sense as it would lead to the incorporation of many of the facilities that are well-used by residents of Cage Green, such as the Cannon Lane Retail Park and town centre facilities. In this sense, by expanding, the ward therefore has a more logical identity.
- 3.11 Finally, it should also be highlighted that the Council's proposed amendment to the warding pattern in Tonbridge would also make more sense in relation to religious institutions and their communities in the town. Currently, both St Peter and St Paul (Church Lane) and St Stephens (Waterloo Road) are in the proposed Judd ward despite serving fundamentally different communities. The creation of the new Cage Green ward would link St Peter and St Paul with both St Saviours and St Phillips, which are more closely linked.

4. Naming of Proposed Wards

- 4.1 The Council has reviewed the suggested names for the proposed wards put forward by the LGBCE. In response to the request for views and alternative names, the Council has come to a conclusion on each of the proposed ward names, as set out in Table 3:

Proposed Ward Name	Council View	Alternative Names
Cage Green	No disagreement with the names per se, but only once changes to the pattern between the two has been amended.	
Judd		
Vauxhall	Agree	
Higham	Agree	
Trench	Agree	
Hildenborough	Agree	
Bourne	Agree	
East Peckham, Mereworth and Watringbury	Felt this ward name could be shortened, but it is accepted	
Borough Green and Platt	Agree	
Pilgrims with Ightham	Agree	
Kings Hill	Agree	
East Malling, West Malling and Offham	Felt this ward name could be shortened, but it is accepted	
Birling, Leybourne and Ryarsh	Agree – although long, it is difficult to shorten the name in a meaningful way.	
Snodland West and Holborough Lakes	Agree	
Snodland East and Ham Hill	Agree	
Larkfield	Agree	
Aylesford South and Ditton	Agree	
Aylesford North with Burham, Eccles and Wouldham	This ward name is too long/cumbersome.	North Downs
Walderslade	Agree	

Table 3: Council Response to Proposed Ward Names

4.2 Focusing solely on those wards highlighted in Table 3 as not being wholeheartedly accepted, the following section sets out the reasoning behind the Council's assessment:

4.3 **Aylesford North with Burham, Eccles and Wouldham:** Although the name of this ward does describe its component parts, it is far too long to be classed as 'clear and concise'. Having given consideration to the identity of this particular ward, it is suggested that 'North Downs' would be the most appropriate name, as the North Downs represents a unifying geographical marker in the area.

4.4 In addition, as stated in the above table, it is also felt the following ward names could also potentially be made more succinct, but are accepted by the Borough Council as it is difficult to identify a way of shortening them without losing some of their identity:

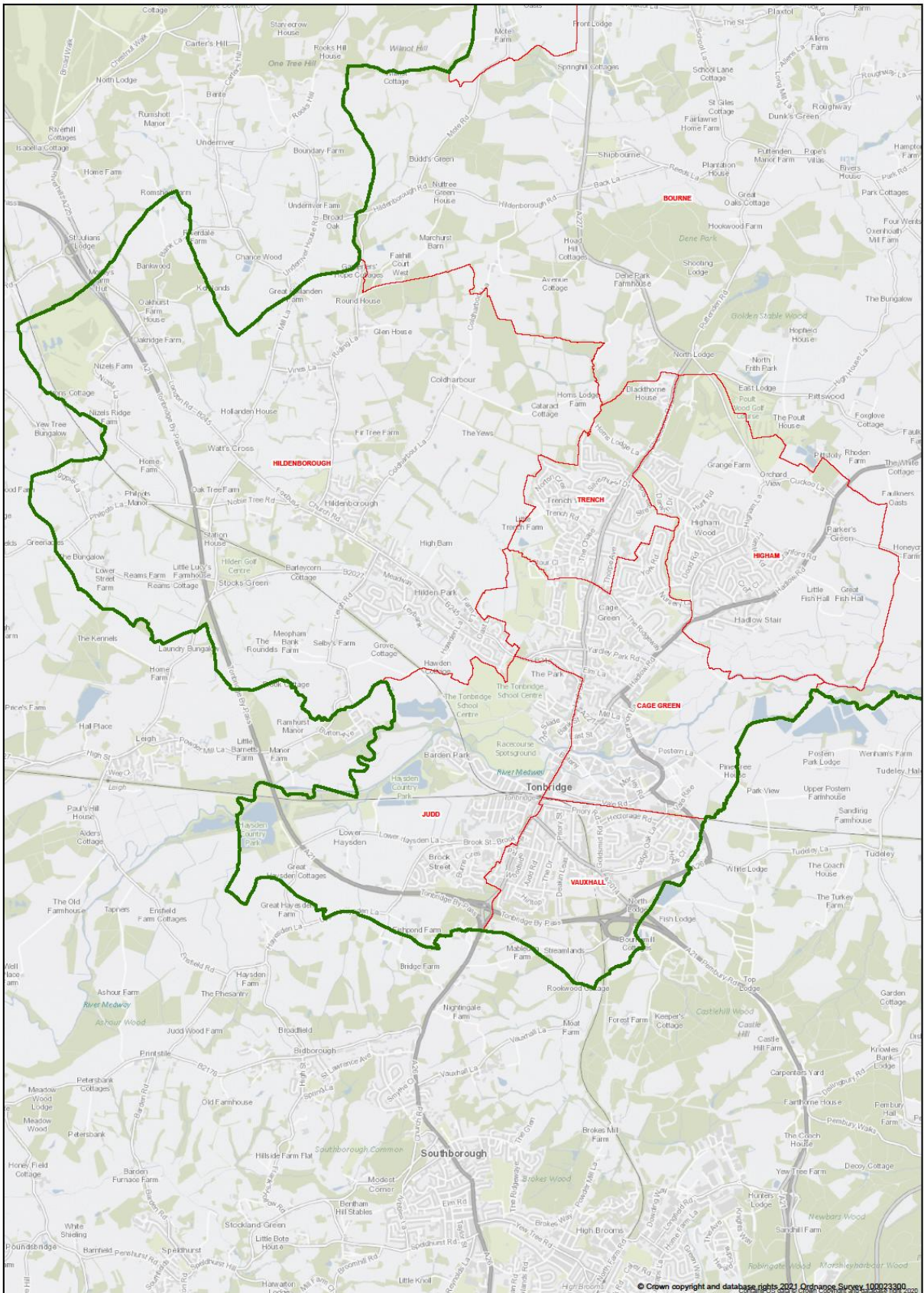
- East Peckham, Mereworth and Wateringbury Ward
- East Malling, West Malling and Offham

5. Conclusions

- 5.1 Tonbridge & Malling Borough Council has looked at the LGBCE draft proposals carefully and taken a pragmatic approach in responding to them. Whilst there are a number of elements to the proposed warding pattern that differ from the Council's own submission, it is evident that a clear and obvious rationale has been applied to the vast majority of it. On that basis, the Council has accepted a number of the proposals that differ from our own.
- 5.2 As the proposals relate to a Council comprising 44 councillors, our response to this consultation has not tried to reinforce previous arguments as many of these would not meet electoral equality requirements. Instead, the Council has taken a fresh look at the proposals and put forward arguments for amendments where it is felt that these are required in order to meet the three statutory criteria.
- 5.3 This led to a focus on south and central Tonbridge in an effort to improve the warding pattern in the proposals and the adjustments to Judd and Cage Green wards.
- 5.4 In addition, comments have been made regarding ward names, particularly regarding the shortening of 'Aylesford North with Burham, Eccles and Wouldham' ward.
- 5.5 The Council hopes that the LGBCE will give our submission very careful consideration.

Appendix 1

TONBRIDGE AREA WARDING PATTERNS PROPOSAL MAP



Appendix 2: Proposed Ward for South and Central Tonbridge

Proposed Wards	Basis	Changes	Electorate	No of Councillors	Electorate per Councillor	Average	Variance
Hildenborough	LGBCE Proposal		4612	2	2306	2428	94.98%
Trench	LGBCE Proposal		4559	2	2280	2428	93.89%
Cage Green	LGBCE Proposal	Includes the area east of the High Street of proposed Judd ward	7276	3	2425	2428	99.89%
Higham	LGBCE Proposal		5097	2	2549	2428	104.97%
Judd	Existing ward	Judd Includes the remainder of former Castle District (Polling TCB)	5027	2	2514	2428	103.52%

Vauxhall	LGBCE Proposal		6738	3	2246	2428	92.50%
			33,309	14			

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