

From: Faversham Town Council
To: Local Government Boundary Commission
Date: 1 July 2015

LOCAL GOVERNMENT BOUNDARY COMMISSION FOR ENGLAND: ELECTORAL REVIEW FOR KENT

1. Issue

This paper is Faversham Town Council's response to the Swale section of LGBCE's draft recommendations for Kent County Council. It argues that the arrangements proposed for Faversham are unnecessary for LGBCE's three statutory criteria or contrary to them.

This submission shows how the Commission has misinformed itself, and it seeks merely the retention of the existing division pattern around Faversham, rather than the big and unnecessary shake-up laid out in the Commission's draft recommendations.

2. Consideration

The Commission's draft recommendations in relation to the existing Faversham division and existing Swale East division appear unnecessary for reasons of either electoral equality in any division or for "doughnut" considerations (once the situation on the ground is understood). The Commission's recommendations appear at odds with the Commission's three statutory criteria:

- Equality of representation (proposed changes are not needed for this)
- Reflecting community interests and identities (proposals damage these significantly)
- Providing for convenient and effective local government (proposals are contrary to this)

Equality of Representation

► A Faversham division with variance of less than 6% above average can, as shown by Labour's submission to the division pattern consultation, be kept as part of a largely maintained Swale mainland arrangement that nevertheless transfers relatively urban Murston Ward from its present rural Swale East division and into an urban Sittingbourne division, a transfer sought by the Commission in its August 2003 draft recommendations. Equally, the existing Faversham division can be retained under Conservative KCC's preferred Swale arrangement, under which Murston would stay in the existing Swale East.

► Adverse effects of the scheme on which the Commission is consulting include the fact that the 42.4% of voters spread across rural parishes covering 98.4% of the area of the proposed new Mid Swale (which is more than 10 miles from end to end) risk being swamped by a Faversham element constituting 57.6 per cent of the new division's electorate and concentrated at its eastern edge in a discrete Faversham urban block covering only 1.6% of the new division's land area.

Reflecting community interests

► Many people in Faversham are astonished that there should be any consideration of chopping their town in two when it is so clearly a community of itself and when there is no electoral equality imperative from any division to alter it. The Commission seems to have taken this view in 2004 and nothing has changed to justify a different conclusion.

Providing for convenient and effective local government

► The proposal of the Local Government Boundary Commission to split the Faversham division and radically reshape certain other division arrangements for Swale appears to be

based on the Commission misinforming itself about the geography and the electoral situation north of Faversham, which are very unusual if not unique, with a division boundary running through a sea channel.

► Faversham should stay a county division without addition or subtraction. It is coterminous with the Faversham Town Council area, which is very much a community, and an unaltered division would be well within the electorate variance stated as acceptable by the Local Government Boundary Commission in its draft recommendations.

3. Detailed consideration

Equality of Representation

A: Commission's 'doughnut' worry not relevant here

B: Risk of Faversham block outweighing a dispersed rural vote

C: Other drawbacks of splitting Faversham (mix of equality of representation and effective local government)

Reflecting community interests and identities

D: Faversham is a community and ought not to be split

E: What makes Faversham a community

F: Swale East identity

Effective local government

G: Faversham works as a division that should be retained

H: Watling Ward names

(See also C: Other drawbacks of splitting Faversham (mix of equality of representation and effective local government))

Other

I: Commission inconsistency

A Commission's 'doughnut' worry not relevant here

The Commission's objection to doughnut-shape divisions, which it seeks to apply to the existing Swale East division encircling Faversham, is not relevant here because of the facts on the ground (and in the water).

The Commission states that its objection to doughnut divisions is based on the view that electors in a segment of an outer circle have more in common with electors in the adjoining segment of inner circle than they do with other people on the far side of the outer circle.

This consideration is, however, simply not applicable here because the part of the existing Swale East division north of Faversham is virtually uninhabited and uninhabitable.

Although Swale East looks like a classic doughnut situation on diagrammatic maps, the reality is very different on the ground north of Faversham, whose civil parish boundary goes as far north as Hollowshore, where Faversham Creek and Oare Creek meet.

The area of the existing Swale East division north of the Faversham boundary, which is the area that visually completes the supposed doughnut, consists of expanses of Faversham Creek and Oare Creek southward to their mid-way points, the south-to-north section of the merged creeks, the farmed Nagden Marshes, Kent Wildlife Trust's Oare Marshes wetland reserve, its South Swale reserve in Graveney parish and an expanse of the sea strait or

channel known as The Swale to its midpoint between mainland Kent and the Isle of Sheppey.

Indeed, about half of the width of the supposed Swale East doughnut north of Faversham is this arm of sea between the Isle of Sheppey and the Kent mainland.

The land takes in the KWT South Swale reserve (designated Environmentally Sensitive Area, Local Nature Reserve, Ramsar, SSSI and Special Protection Area), and the KWT Oare Marshes reserve (designated Environmentally Sensitive Area, Local Nature Reserve, Ramsar, SSSI and SPA).

This slice of Swale East outer circle of tidal water, mudflats, marshland and farmland within the parish of Oare and the parish of Graveney with Goodnestone north of the Faversham boundary is not inhabited and nor, because of flood risk, protective designations and the boggy nature of most of the land, is it ever going to be. The Commission's concern about doughnuts, if based on the relationships of communities as the Commission states, is simply not relevant here in the absence of residents.

In addition, if there were electors in this land south of the Swale tidal channel in the supposed northern doughnut section of the present Swale East division, they would have no community connection with the north of Faversham because this land is separated from Faversham by Oare Creek and Faversham Creek. In any case, the northern part of the Faversham division bounded by Oare Creek and Faversham Creek and running as far north as Hollowshore is, from about where Ham Road and Oare Road meet, largely quarry, lakes, farmland and Ham Marshes, bisected by waterways, heightening the character of this area as a huge uninhabited space that, looking at things on the landscape scale, extends across The Swale to the southeast of the Isle of Sheppey.

The pattern of virtually no habitation south of The Swale to a line of latitude running through the northern edge of the Faversham civil parish also applies eastwards and westwards, prevailing for the whole 5.5-mile stretch from the village of Conyer in the west to the Swale East division's boundary with the proposed Whitstable West division on Graveney Marshes.

This absence of habitation can be seen from the Ordnance Survey map carrying the Commission's proposed boundary lines that is presented as part of the Kent review on the Commission website. The absence of habitation can also be seen from Google Maps (either Map or Satellite setting) or, of course, from walking the territory, as hundreds of birdwatchers and serious leisure walkers do, drawn by the unspoilt sweeping flatlands of the North Kent marshes and their atmosphere of remoteness.

B Risk of Faversham block outweighing a dispersed rural vote

Faversham is a cohesive, market-town community with housing built to quite high density, much of it in Victorian terraces. Putting half of Faversham residents in a new division with a large number of small villages spread over a large area could mean that the Faversham element of the division effectively swamps the rest. The Faversham element of the proposed new Mid Swale division would be 57.6% (the proportion of electors from the Faversham wards of St Ann's, Priory and the western half of Watling totalling 8,313 out of a Mid Swale 14,439 on the Commission's 2020 figures).

The 57.6% of the proposed Mid Swale division's electors who would be Faversham residents in a tight geographical area could easily vote on the basis of a particular issue

that means nothing to the people in the proposed division's swath of rural parishes stretching 10 miles to the west of Faversham and two miles west of Sittingbourne.

In the absence of any necessity to alter the Faversham division, it is not rational to split the town and create a grossly flawed Mid Swale division that has 57.6% of its electorate coming from a discrete urban area that amounts to only 1.6% of the division's land area on its extreme eastern edge and which is intertwined as a community with the rest of its town of Faversham to its east.

This all leaves the proposed Mid Swale weighted towards a Faversham portion that looks east to the other half of Faversham and to Canterbury. If an issue arose in Faversham that caught people's imaginations and perhaps led to a Faversham political grouping contesting county elections, the rural parishes could be effectively be excluded from meaningful involvement in an election decided in half of Faversham on Faversham issues.

Residents of Bredgar parish in the far west of the proposed Mid Swale seem to have a particularly poor deal. Not only are they on the edge of the Swale district with a rather untidy road-bisecting Swale/Maidstone boundary and Bredgar/Stockbury parish boundary, they are now proposed to be in a county division dominated by a concentration of Faversham electors 10 miles away, as the crow flies, at the other end of the division.

This bad mix of urban and rural is being created at a time when urban Murston Ward is proposed to be joined with urban Sittingbourne to end the urban/rural mismatch that it represents within rural Swale East and that it would represent with the rural villages of the proposed Mid Swale division.

On the one hand, the Commission envisages a change for Murston to tidy up one urban/rural mismatch, and on the other it seeks creation of two urban/rural mismatches with its proposal for a Mid Swale and a Swale East that each consist of rural parishes plus a half of Faversham town.

The Commission's reshaped Swale East division, at present a logical community of only rural parishes (leaving aside Murston Ward), would be another awkward mix of urban and rural, consisting of a Faversham element of 50.9% of the electorate (2020 figures), with 49.1% of the electorate from a number of rural parishes.

As with the proposed Mid Swale, although to a lesser extent, Faversham electors from a relatively small area likely to be concerned about the same town issues would constitute the majority of the new-style Swale East division's electorate against rural electors less likely to have issues in common across their various villages, apart from a general rural identity.

An urban hotspot containing 50.9% of electors in about 3% of the division's area right on its north-western edge in Faversham and looking to the rest of Faversham for its community identity would make the proposed revamped Swale East a poor mix of town and country.

C Other drawbacks of splitting Faversham

1) The Faversham division, coterminous with Faversham town and wholly within the Faversham & Mid Kent parliamentary constituency, would be split into two approximate halves and combined with rural areas in the Sittingbourne & Sheppey parliamentary constituency. This would reduce the prospect of efficient and understandable

representation at all levels. The number of Swale KCC divisions that include areas of both Faversham & Mid Kent and Sittingbourne & Sheppey would increase from one (the existing Swale East) to two (the new Mid Swale and the new Swale East).

2) The draft recommendation would unnecessarily split a town that works well numerically as a division and would create two essentially new divisions that are an illogical mix of urban and rural wards. This is the last thing that people living in these areas would propose and it would leave voters confused and feeling less engaged with the electoral process. As KCC has told the Commission, those Swale East parish councils that it has been possible to consult have been opposed to a merger with any part of urban Faversham.

Faversham would be split (and in a somewhat fiddly way in the Forbes Road/Kingsnorth Road/London Road area) and town neighbourhoods would be split in order for half to be put into a new Mid Swale division that extends west of the town of Sittingbourne. Thus, the western half of Faversham would be wrenched out of Faversham and joined not merely with parts of the existing Swale East rural division to the west of Faversham but also with a big slice of the existing Swale West rural division that lies beyond the existing Swale East. The Commission's proposed new arrangement for west Faversham effectively leapfrogs the bulk of an existing county division and links Faversham with what is on the far side of that division.

In the absence of numerical need in respect of any of the divisions and with the doughnut issue not relevant, granted that the Swale East water and land north of Faversham are virtually uninhabited and uninhabitable, it seems neither rational nor in line with the statutory criteria to split compact Faversham and link half with a division of very different nature and extending to the other side of Sittingbourne.

Placing eastern Faversham (Abbey Ward and the east of Watling Ward) in the new-form Swale East also creates a bad urban/rural mismatch.

3) This treatment of Faversham is the opposite of what is being proposed in the Sittingbourne area, where it is proposed that urban Sittingbourne and the rural areas of Sittingbourne should be separate. This may be part of the reason that a split Faversham is proposed to be tied up to Sittingbourne area villages even as far as villages west of Sittingbourne. In fact, the statutory criteria of community and electoral equality can be better maintained by either adopting the Labour model of retaining the existing divisions, altered only by placing the urban Murston Ward into the Sittingbourne division with which it is contiguous and making other minor adjustments in Sittingbourne, or by following Conservative KCC's model for retaining present patterns.

4) At present each of the four Faversham wards has coterminosity for Swale Council and Faversham Town Council. This has been maintained through all boundary revisions since wards were introduced in Faversham in 1967 and Swale was created in 1974. For the sake of the proposed unnecessary splitting of Faversham between two county divisions, the Commission is considering splitting the Swale/FTC ward of Watling into two town council wards of Watling Ospringe and Watling Preston. Since elections for Swale and the town council take place on the same day, this would be confusing for residents at election time as well as between elections.

5) The suggested town council ward names of 'Watling Ospringe' and 'Watling Preston' present problems.

i) 'Watling Ospringe' may lead to confusion with the adjoining Ospringe Parish Council. Indeed, the Ospringe parish includes houses in Brogdale Road and Water Lane that were within Watling Ward and within the town council area before boundary changes in the 1980s.

ii) 'Watling Preston' presents some scope for confusion since Priory Ward contains the large social housing development, from Barnfield Road to Upper Brents, known as the North Preston Estate (with the North Preston Allotments). Faversham also has a Preston Street, which is in the town-centre part of Abbey Ward, and is well-known because it is effectively Faversham's high street.

6) The proposed split of Watling is untidy on the ground, pursuing a line all around the houses in the Forbes Road / Kingsnorth Road area. That line may suffice for polling districts within a district council ward but not for a boundary between county divisions. The line falls short of the "strong, clearly identifiable boundaries" that the Commission says it must try to recommend for divisions it puts forward. The line wiggling its way through Faversham north of Watling Ward is similarly inadequate for a county division boundary.

D Faversham is a community and ought not to be split

The Commission's draft proposal is to split Faversham and to put into the proposed new Swale East division the ward of Abbey and the eastern end of Watling Ward and to put into the proposed new Mid Swale division the wards of Priory and St Ann's and the western end of Watling Ward.

Faversham is a real and cohesive community as a relatively compact, quite densely populated market town with a town council and a lively political culture. It makes a natural county division.

It should not be split, and a split is not required by any of the Commission's statutory criteria, which are best served by its retention. Indeed, splitting Faversham and creating the urban/rural divisions of the proposed Swale East and Mid Swale is completely at odds with the community criterion.

The Commission usually uses parishes as building blocks for county divisions. Here, the Faversham division is identical to the Faversham civil parish and yet the proposal is to split this community in two and indeed to split an existing Faversham Town Council ward.

The concerns of Faversham residents are likely to be different from those of residents of the rural area with which it is proposed to link the two halves of the unnecessarily split town.

When there are Labour and KCC schemes that would essentially preserve familiar county divisions and maintain good electoral equality and clearly identifiable, established boundaries, it appears strange that the Commission should be consulting on a scheme involving major restructuring with the splitting of Faversham and the creation of two new urban/rural wards that fail as communities.

E What makes Faversham a community

A combination of plenty of social activity and the compactness of the built-up town mean that Faversham functions well as a community. Its compactness is indicated by the fact that one need walk for only 10 or 15 minutes from the town centre (Guildhall) in any

direction to reach the edge of the built-up area.

Within this very walkable community, most everyday services and facilities can be found, in the form of shops, banks, junior and secondary schools, public library and registration of births and deaths, and a major railway station with HS1 services, as well as (and all run by various local charities) a swimming pool, a small theatre, a gym and a £3m community centre. Good bus services exist in Faversham, with useful circuits now provided within the town, but these are on routes to other towns, with links to the villages generally being poor. Taxis are well used in the town, with any trip within town being quite short and thus not too costly.

This all makes for a very self-sufficient community, and it benefits from having a wide range of social groups. The Faversham Society is one of the most active civic groups and local history societies in Britain, with more than 1,000 members, of whom more than a tenth are active volunteers.

There is a strong political culture in Faversham and, whereas the rural parish councils sometimes struggle to attract enough candidates to necessitate elections or even to form a council quorum, town council elections have always been contested since the town council succeeded Faversham Borough Council in 1974. In May 2015, town council seats were contested by Conservative, Labour, Green and independent candidates.

The western parts of Faversham proposed for the new Mid Swale division have a strong neighbourhood identity of their own, with a focal point in the West Faversham Community Centre (run by the West Faversham Community Association). The Brents Community Association was set up in 2013 by residents of the Brents area of west Faversham, including North Preston Estate, “to provide a voice for the local community and to promote continuous improvement of the area”.

Beyond their own western Faversham, the residents do not look to the villages of the proposed Mid Swale but look eastward to the rest of Faversham, which has the shopping streets, the swimming pool, the library etc. In so far as they need to look beyond their own town for things, Faversham people tend to go not to Sittingbourne but to Canterbury for shopping, education, entertainment and healthcare.

The eastern parts of Faversham proposed for the new Swale East are integral to the town, containing facilities such as the shopping streets, the library, the post office, the swimming pool and the railway station.

F Swale East identity

The existing rural Swale East appears to work well as a division, sharing a countryside identity and with its parishes all being in the Swale Rural Forum, which Faversham is not.

The rural parishes of the existing Swale East have a long history of being together, having all been in the former Swale Rural District Council before 1974, as were villages in the proposed new Swale West and the proposed new Mid Swale.

The villages relate to each other far more than they do to Faversham or to Sittingbourne, a point that seems to be recognised by the Commission’s draft recommendations for the Sittingbourne area, but not with regard to Faversham.

G Faversham works as a division that should be retained

Faversham should not be split and does not need to be split to achieve the average KCC electorate size nor to allow any other division to achieve the requisite electoral size. Nor is the split necessary for either Labour's or Conservative KCC's suggested treatments of Murston Ward and West Downs.

Faversham's county councillor is the only directly elected person representing Faversham rather than representing only a part of it or something wider than it. This is valued by residents and makes for convenient and effective representation. The Faversham division is understood, as might be expected for a division that has existed with only minor tweaks since the creation of Kent County Council in 1889. It is part of the local political culture that the town is the same as the division, and this makes for understandability and encourages interest in county elections.

The present situation of Faversham having one county councillor who represents nothing more nor less than Faversham provides the greatest possible clarity for the public on who to contact on KCC issues. Under the Commission's draft recommendations, a split Faversham would have two county councillors, neither of whom would have 'Faversham' in his or her division's name, but instead Swale East or Mid Swale. Faversham people would be much less clear as to which division they were in and the rather complicated proposed boundary allows of no snappy phrase to inform them.

H Watling Ward names

In the event that the Commission proceeds with its proposals relating to Faversham, it would be preferable that the names of the two town council wards formed out of Watling Ward should not be 'Watling Preston' and 'Watling Ospringe', but 'Watling East' and 'Watling West'. This would avoid scope for confusion with Ospringe Parish Council (discussed above), and would make for briefer names.

"Watling" is already a geographical identifier, pointing to the area of the Roman Watling Street, and there is reasonable awareness of the area meant by Watling Ward, which has not changed greatly since wards were introduced in 1967.

Watling is also part of a Faversham set of Swale/town ward names, Watling, St Ann's, Abbey and Priory, that each point to an area and a piece of history. Adding 'East' and 'West' to Watling would be less disruptive to the set.

I Commission inconsistency

Back in 2003, the Commission accepted in draft recommendations the retention of the Faversham division without addition or subtraction, saying that it was "adopting the County Council's proposed Faversham, Sheppey and Sittingbourne South divisions as we consider that they would provide a good balance between electoral equality and coterminosity while reflecting community identities and interests". The Commission was right then with regard to Faversham and is wrong now.

The Commission considered in 2003 that in western Swale, "better separation of the urban and rural areas could be provided, by combining Kemsley borough ward with Milton Regis and Murston borough wards to comprise a Sittingbourne North division". This is achieved in the Commission's present draft recommendations and there is no rationale for simultaneously and unnecessarily worsening separation of urban and rural areas to a far bigger extent by forming the proposed new Swale East and new Mid Swale.

The Commission's final recommendation (2004) said: "We generally seek to avoid combining urban and rural areas, but we acknowledge that it is not always possible to avoid the creation of divisions which contain diverse communities. In this instance, on balance, we consider that the inclusion of Murston ward in the proposed Swale East division is justified." This time round, the balance seems to have tilted against retaining an urban/rural combination through keeping Murston in Swale East, but a far worse urban/rural mismatch is created with urban Faversham being combined with villages in the rural areas around Sittingbourne and around Faversham.

The draft recommendations say that the proposed Mid Swale includes western Faversham wards "along with the rural parishes between Faversham and Sittingbourne either side of the A2". This underplays the extent to which Mid Swale would run far south of the A2, going south of Sittingbourne, and, indeed, south of the M2, and would also stretch west of Sittingbourne.

The western end of the proposed Mid Swale would tend to access services and KCC services in Sittingbourne, whereas the eastern end would tend towards Faversham.

A handwritten signature in black ink, appearing to read 'Jackie Westlake'. The signature is written in a cursive, flowing style.

Jackie Westlake OBE
Town Clerk, Faversham Town Council
1 July 2015