



LOCAL GOVERNMENT COMMISSION
FOR ENGLAND

FINAL RECOMMENDATIONS
ON THE
FUTURE LOCAL GOVERNMENT OF
KENT

A REPORT TO THE SECRETARY OF STATE
FOR THE ENVIRONMENT

London : HMSO

THE LOCAL GOVERNMENT COMMISSION FOR ENGLAND

This report sets out the recommendations for the structure of local government in Kent, as agreed by the Commission:

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Local Government Commission for England

Sir John Banham
Chairman

Dear Secretary of State

THE FUTURE LOCAL GOVERNMENT OF KENT

With this letter the Local Government Commission is submitting its final recommendations for the structure of local government in Kent.

You will be aware that the Commission put forward four possible structures, on which we sought the views of all those with a stake in local government in the area: local residents, voluntary groups and businesses as well as existing local authorities. These possibilities were: two unitary authorities in north-west Kent with the retention of two tiers elsewhere; seven unitary authorities; six unitary authorities; and the retention of the present two-tier structure throughout the county. The Commission's stated preference was for the establishment of two unitary authorities in north-west Kent with the retention of two tiers elsewhere in the county, but we made it clear that we would be prepared to consider recommending any of the three alternatives if these turned out to enjoy greater local support.

Since our draft recommendations were published on 13 June 1994, the Commission has heard directly from over 53,000 respondents, including many voluntary organisations, businesses, parish and town councils, and other local and national organisations, along with each of the local authorities. We have also commissioned a survey of a representative sample of local residents.

The Commission did not set out to conduct a referendum and it is aware that there have been vigorous local campaigns, both for unitary structures and for no change. The Commission appreciates that these may have influenced people's views. Nevertheless the Commission is satisfied that it has obtained a fair reflection of local opinion.

This consultation has caused the Commission to reconsider its draft recommendations. It is clear that there is overwhelming local support for the retention of the existing two-tier structure of county and district councils. Taking this into account, and considering all of the other evidence in the light of the statutory criteria, we are recommending no change to the present structure of local government in the area.

The review process has brought to the surface a number of useful proposals for enhancing the management and effectiveness of local government, whether in a two-tier or unitary structure. Indeed, the Commission has been mindful of the fact that the manner in which

any given structure is managed is probably as important as the structure itself and in any case there is a constant need to revise and update practices. We hope that such improvements will be pursued with appropriate vigour now that the distractions of reorganisation can be put behind local authority members and officers alike. In particular, we would like to see more management authority and responsibility devolved to local communities, and a more meaningful consultative role for parish and town councils.

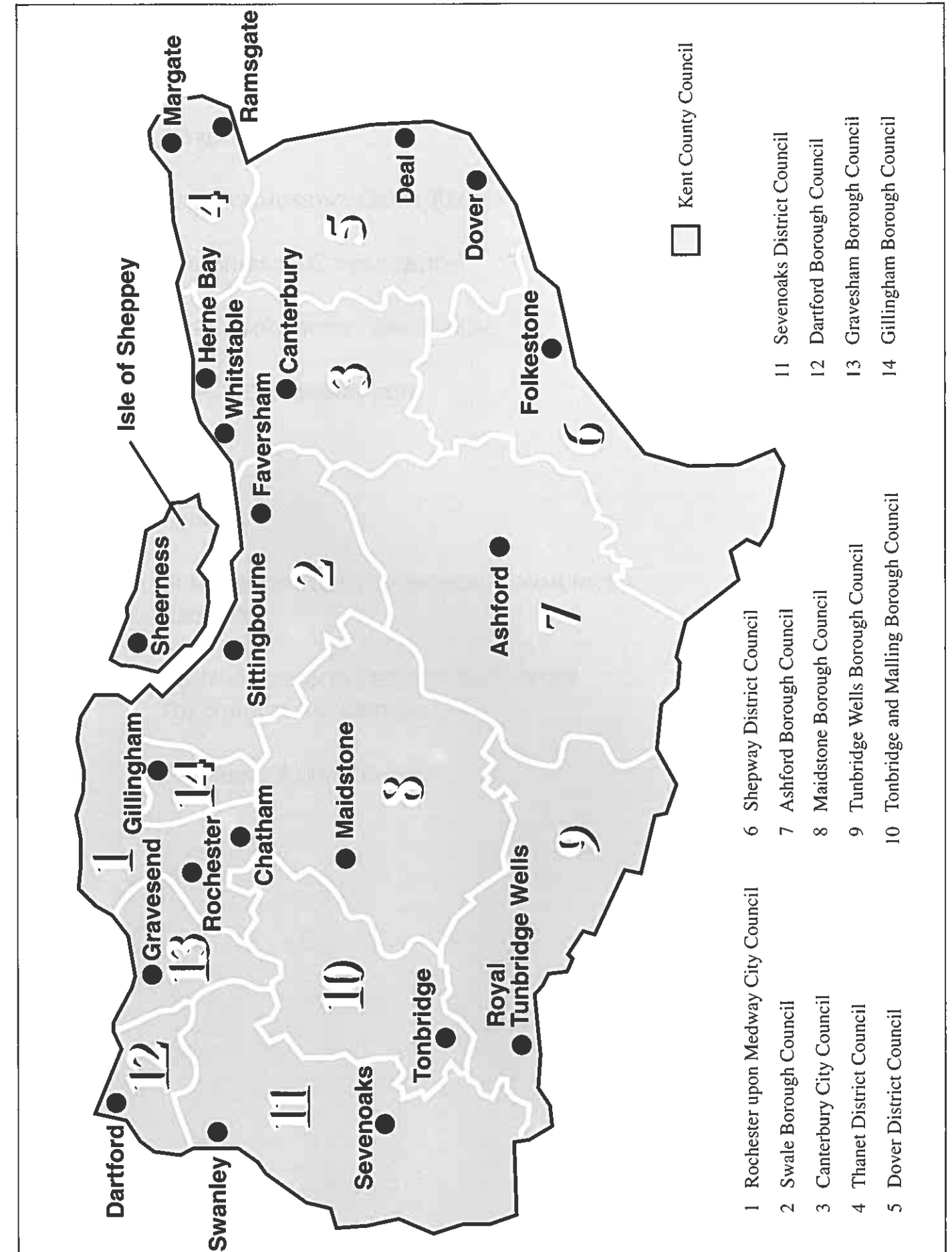
In a further general report to be published when its structural review programme has been completed, the Commission will discuss the establishment of unitary authorities where these come into existence, and their on-going evolution; the same report will consider the improvements that can and need to be made in two-tier structures where they continue.

Yours sincerely



Sir John Banham
Chairman
26 October 1994

Map 1: THE STRUCTURE OF LOCAL GOVERNMENT IN KENT



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1 INTRODUCTION

- 1 This report contains the Commission's final recommendations for the structure of local government in Kent. It represents the culmination of ten months' work by the Commission, during which time it received the views of almost 55,000 individuals and organisations.
- 2 The report is in four main parts:
 - (i) Chapter 2 describes the evidence received at the initial stage of the review and the Commission's draft recommendations.
 - (ii) Chapter 3 details the responses to consultation about the draft recommendations.
 - (iii) Chapter 4 sets out the Commission's conclusions.
 - (iv) Chapter 5 contains the Commission's final recommendations.
- 3 The review commenced on 13 December 1993 and was conducted under the provisions of Part II of the Local Government Act 1992, having regard to the Secretary of State's Policy and Procedure Guidance issued in November 1993, as subsequently amended by the courts. In accordance with the Secretary of State's Procedure Guidance, the Commission wrote to all the principal authorities in Kent, informing them of the review's commencement. Copies were also sent to the other organisations and individuals listed in annex A to the Guidance.
- 4 A period of consultation until 8 April 1994 was given for all local authorities and any other body or person interested in the review to put their views to the Commission on whether there should be changes to the structure of local government in the county, to any boundary or to electoral arrangements, and if so, what those changes should be.
- 5 The Commission's draft recommendations were published in its report, *The Future Local Government of Kent*, on 13 June 1994. Copies were sent to organisations which wrote to the Commission during the initial consultation stage, to appropriate representative organisations, and to the organisations and individuals listed in annex A of the Secretary of State's Procedure Guidance. Copies were also made available to local residents on request.
- 6 In addition, principally through the Royal Mail, the Commission distributed over 650,000 leaflets with a questionnaire to households in the county. The leaflets summarised the Commission's draft recommendations and alternative structural options. The Commission also advertised extensively through the local press, drawing residents' attention to the review and to its draft recommendations and alternative structural options.

2 THE COMMISSION'S DRAFT RECOMMENDATIONS

- 7 At the start of the review, local authorities, members of the public and all other interested parties were invited to write to the Commission giving their views on the future local government of Kent. Professor Michael Chisholm, Sir Kenneth Couzens and Professor Malcolm Grant, the Commissioners with particular responsibility for the review, spent time in the county meeting local authority members and officers, interest groups, business organisations and individuals.
- 8 Before considering the options for local government in Kent, the Commission wanted to understand local perceptions of community identity, and to determine how much local people knew about the Commission's work and their views on the principle of unitary local government. As part of the review, a county-wide survey among a representative cross-section of the population was undertaken by Market & Opinion Research International (MORI) on behalf of the Commission. The survey, similar to those carried out in other review areas, covered interviews with 2,922 residents aged 18 and over. The results were published by MORI in January 1994. A summary is given in appendix A.
- 9 The Commission received almost 1,100 representations in the initial stage of the review and of these over half were from individuals, with the balance coming from interest groups, the voluntary sector, parish and town councils and the business community. A further 373 views were expressed in a number of petitions forwarded to the Commission, which were also taken into account. Many of these were concerned with the local implications of any change to a unitary structure.
- 10 Of 576 responses from individuals, 297 (52 per cent) favoured the retention of the present two-tier structure in Kent while 79 (14 per cent) favoured a unitary structure. There were 176 responses from parish and town councils in Kent and of these two-thirds (65 per cent) wished the present two-tier arrangements to continue whilst under a fifth (18 per cent) favoured a unitary structure. Around half (49 per cent) of the 47 business interests who wrote also favoured no change, compared to about a fifth (19 per cent) who favoured unitary structures. Of 163 responses from local and voluntary groups, two-fifths (41 per cent) favoured no change while 10 per cent favoured a unitary structure.
- 11 About a third of all representations were not primarily about a change of county-wide local government structures but about specific local issues, such as parishing or local boundaries. Some representations expressed an interest in a particular local authority service, such as education, trading standards or the archive services. There was some concern at the prospect of these services being organised across an area smaller than the present county.

- 12 The Commission also received views from a wide spectrum of national organisations with a particular interest in the issues raised by local government reorganisation. Almost unanimously, those advocating change recommended unitary authorities larger than the existing districts. However, there was also support for the existing two-tier structure. Each of the principal local authorities in Kent also made their views known to the Commission.

THE STRUCTURAL OPTIONS FOR KENT

- 13 The Secretary of State's Policy Guidance to the Commission advises that proposals which are put forward by groups of authorities should be an important starting point for the Commission. It also advises that, where such proposals demonstrate that a range of options have been considered, along with the implications for individual services, the Commission should give them particular weight. Accordingly, the Commission evaluated carefully the main options suggested by the existing local authorities. In doing so, however, it was mindful of the need to arrive at draft recommendations or alternative options which were viable, which had been assessed against the existing two-tier structure, and which met the statutory criteria set out in section 13(5) of the 1992 Act.
- 14 The main preferred options put forward by the existing local authorities in Kent, on which the Commission initially focused, are set out below:
- (i) **Retention of the existing two-tier system across the entire county area.** This was the preferred option of Kent County Council and of three district councils: Ashford, Gravesham and Tonbridge & Malling.
 - (ii) **Seven unitary authorities.** This option was the preference of eight district councils and the Kent Association of District Councils which resolved that if the Commission accepted the case for change, then an appropriate county-wide unitary solution could be based on between six and eight unitary authorities. The structure would be based on the areas of north-east Kent (Canterbury, Dover and Thanet); south-east Kent (Ashford and Shepway); Swale; Maidstone; Medway (Gillingham and Rochester upon Medway); north-west Kent (Dartford and Gravesham) and west Kent (Sevenoaks, Tonbridge & Malling and Tunbridge Wells).
- 15 Each district council provided its own submission to the Commission. Eight councils preferred seven unitary authorities, three councils preferred no change, and another three authorities (Sevenoaks, Shepway and Thanet) preferred unitary authorities based on their present boundaries. Local authorities also evaluated a range of other options in their submissions to the Commission, including, in the case of the County Council, a three unitary authority structure.
- 16 The Commission's report, *The Future Local Government of Kent*, set out its consideration of these structures.

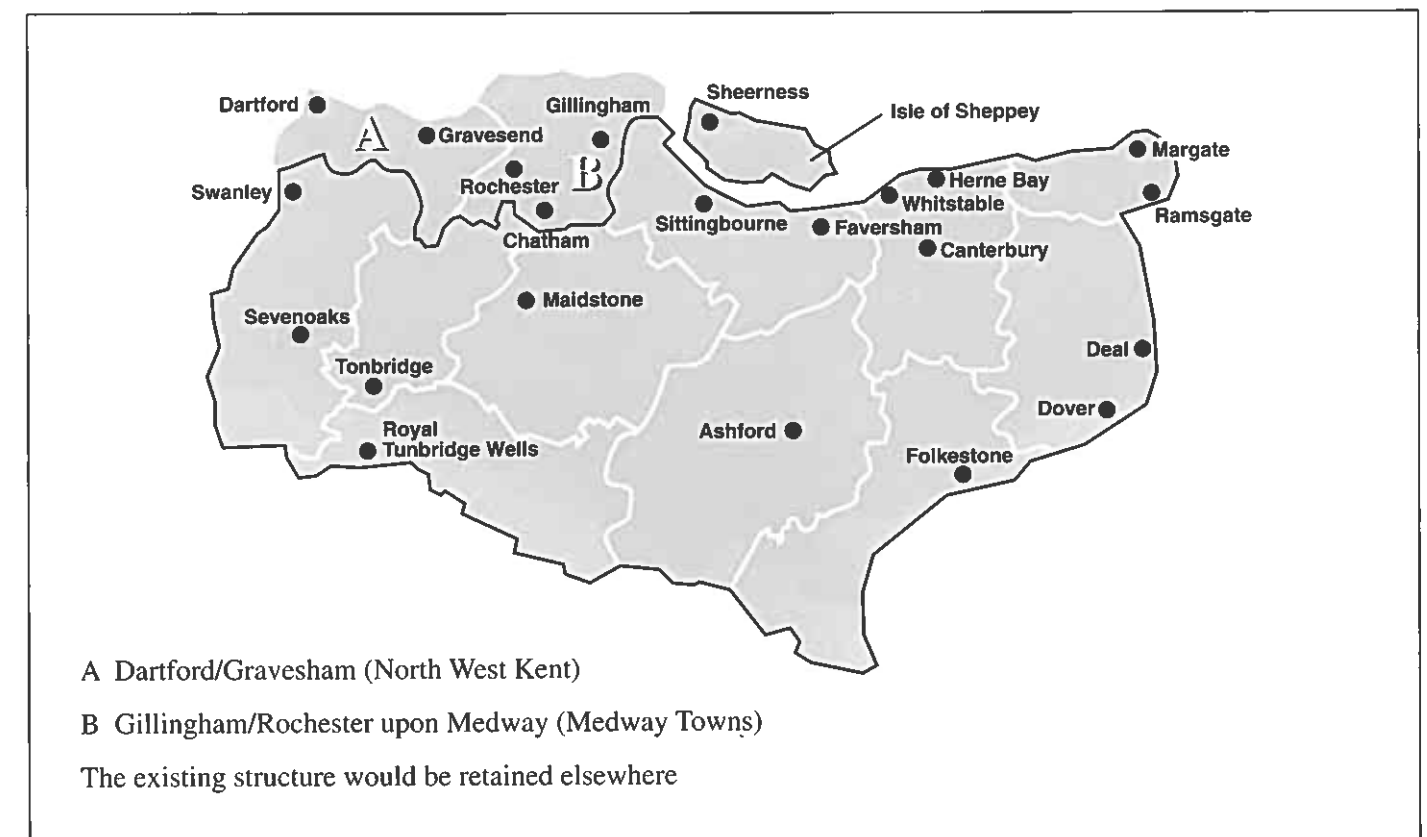
- 17 Having considered all the evidence submitted by others and collected by itself, the Commission concluded that the statutory criteria would best be satisfied by modifying the existing structure of local government in Kent. It consulted on the following draft recommendation:

DRAFT RECOMMENDATION (OPTION ONE)

In North West Kent (the area of the present Dartford Borough Council and Gravesham Borough Council) and the Medway Towns (the area of the present Rochester upon Medway City Council and Gillingham Borough Council), the present two-tier structure of local government should be replaced by two new unitary authorities, each responsible for the broad range of services now provided by the four district councils and Kent County Council. In the rest of Kent, there should be no change in the existing structure of local government, comprising ten district councils and Kent County Council.

- 18 Map 2 illustrates the Commission's draft recommendation for structural change.

Map 2: UNITARY COUNCILS FOR NORTH WEST KENT AND THE MEDWAY TOWNS AND THE RETENTION OF THE TWO-TIER STRUCTURE IN THE REST OF THE COUNTY



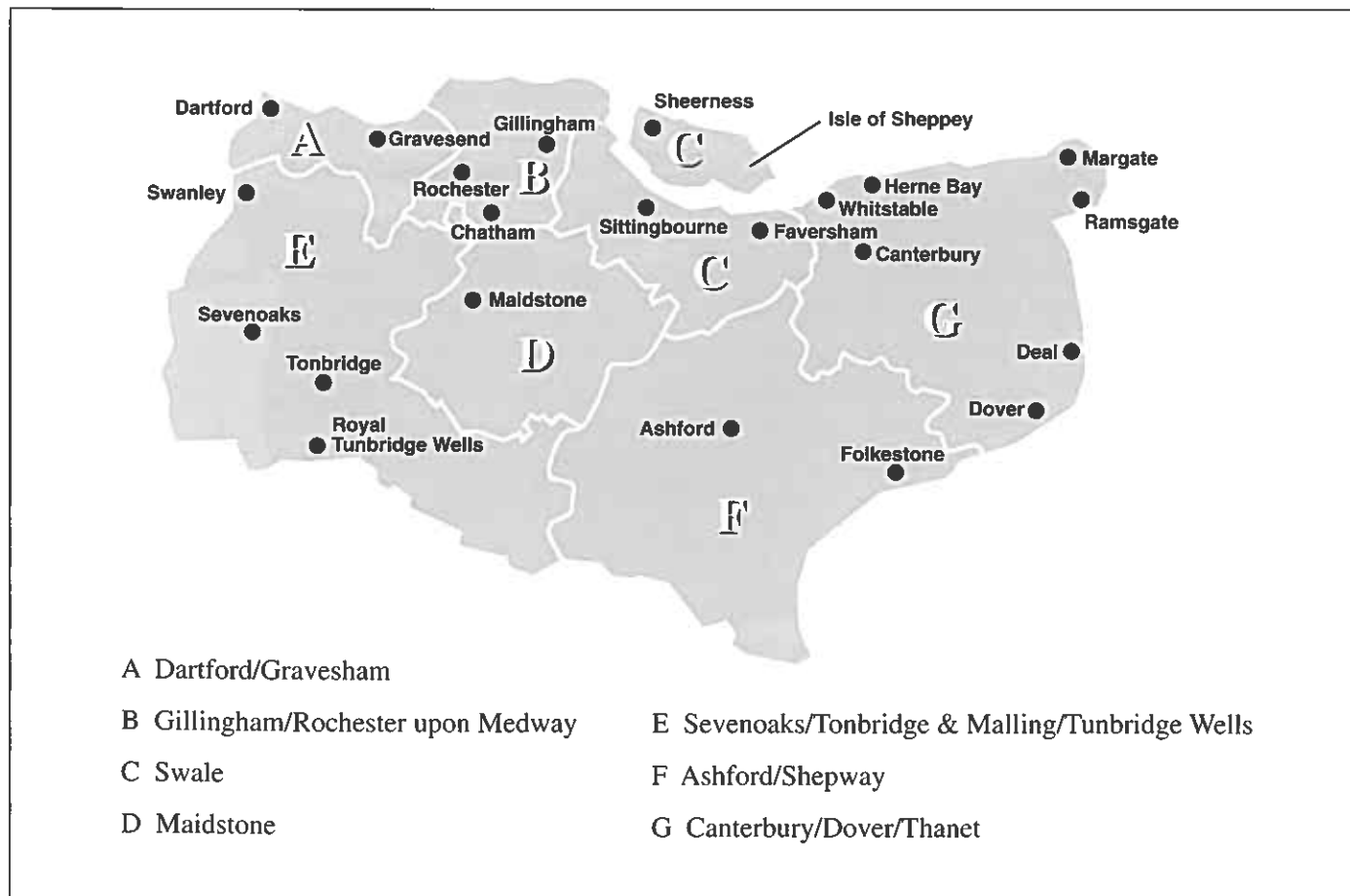
- 19 The Commission identified three viable alternative structures, which might secure effective and convenient local government and also reflect community interests and identities, on which it decided to consult the people of Kent. An alternative structure of seven unitary authorities, as shown in map 3, was put forward as follows:

ALTERNATIVE STRUCTURE (OPTION TWO)

The existing two-tier structure would be abolished and replaced by seven unitary authorities in the areas at present within the district councils of:

- (i) Dartford and Gravesham;
- (ii) Gillingham and Rochester upon Medway;
- (iii) Canterbury, Dover and Thanet;
- (iv) Maidstone;
- (v) Swale;
- (vi) Ashford and Shepway;
- (vii) Sevenoaks, Tonbridge & Malling and Tunbridge Wells.

Map 3: SEVEN UNITARY AUTHORITIES



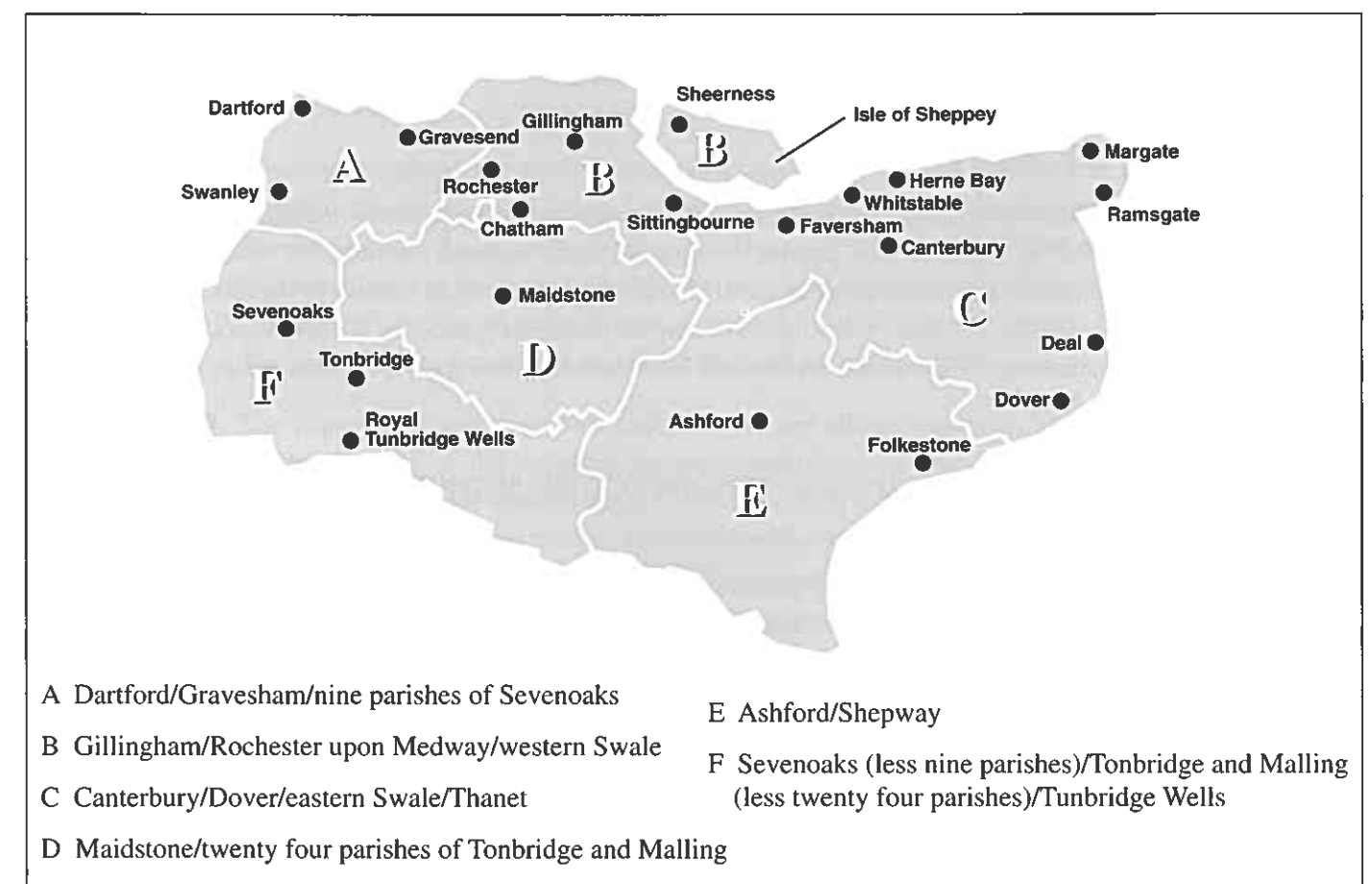
- 20 An alternative structure of six unitary authorities, as shown in map 4, was put forward as follows:

ALTERNATIVE STRUCTURE (OPTION THREE)

The existing two-tier structure would be abolished and replaced by six unitary authorities in the areas at present within the district councils of:

- (i) Dartford, Gravesham, and nine northern parishes of Sevenoaks;
- (ii) Gillingham, Rochester upon Medway, and west Swale;
- (iii) Canterbury, Dover, Thanet, and east Swale;
- (iv) Maidstone and twenty-four parishes from Tonbridge & Malling;
- (v) Ashford and Shepway;
- (vi) Sevenoaks (less nine northern parishes), Tonbridge & Malling (less twenty-four parishes), and Tunbridge Wells.

Map 4: SIX UNITARY AUTHORITIES



- 21 Finally, the Commission also considered that the existing two-tier structure, without any change, offered a viable alternative:

ALTERNATIVE STRUCTURE (OPTION FOUR)

The existing two-tier structure of local government in Kent would remain without any change.

- 22 While two of the Commission's alternative structures involved the abolition of the present County Council, the Commission wished to make clear that it was not advocating the abolition of the ancient 'County of Kent'. The Commission recognised that many people have strongly held loyalties to their county and that, if the County Council were to be abolished, the county would continue as a focus for loyalty and identity as well as for historic, ceremonial, sporting and other purposes. Accordingly, for the avoidance of doubt, it consulted on the following draft recommendation:

DRAFT RECOMMENDATION

The existing county of Kent should be retained for ceremonial and related purposes.

OTHER MATTERS

- 23 In addition to reviewing the structure of local authorities in Kent, the Commission is required to consider the delivery of specific local authority services, to make recommendations about future electoral arrangements, and to take account of the role which parish and town councils could play in the review area. The Commission's consideration of these issues, and its draft recommendations in respect of them, are set out below.

PUBLIC PROTECTION (POLICE, FIRE AND OTHER SERVICES RELATED TO LAW AND ORDER)

- 24 The Secretary of State's Policy Guidance to the Commission is clear in its preference for police and fire service functions to be carried out over an area no smaller than at present. Accordingly, the Commission concluded that, if its draft recommendation were to be confirmed, the public protection and law and order services should continue to cover the present county area of Kent. Combined authorities would need to be established for these services on which representatives of the new unitary councils for North West Kent and the Medway Towns would serve, together with representatives from Kent County Council. The Commission consulted on the following draft recommendation:

DRAFT RECOMMENDATION

There should be combined authorities established for both the police and fire services in the county, on which representatives of the new unitary councils should serve, together with representatives from Kent County Council. No changes are proposed to the probation and magistrates' courts services.

- 25 For the Commission's alternative options of six and seven unitary authorities for the whole of the county, it was also proposed that combined authorities should be established for police and fire services, on which representatives of the new councils would serve.

STRATEGIC PLANNING

- 26 The Commission is invited by section 14 of the 1992 Act to consider whether unitary authorities should be empowered to prepare unitary development plans rather than, as at present, structure plans and local plans.
- 27 The Commission has been concerned that strategic land use planning should not be undermined by changes to the structure of local government, and has therefore normally recommended the retention of structure planning, requiring unitary authorities to assume joint responsibility for the function. This matter is fully discussed in the Commission's report, *Renewing Local Government in the English Shires*, published in December 1993.
- 28 However, it appeared to the Commission that since part of the area of north-west Kent for which it proposed unitary authorities falls within what was then known as the East Thames Corridor (since relaunched as the Thames Gateway), the special planning framework that was being established for the long-term development of this area might itself provide an adequate strategic basis to enable the new authorities to prepare unitary development plans for their areas without the need for structure plans.
- 29 The Commission was concerned that, for the two alternative county-wide unitary options on which it also consulted, an appropriate planning structure would need to reflect the county-wide strategic issues. The Commission therefore proposed that, while it would be appropriate for the two unitary authorities proposed for north-west Kent to have responsibility for preparing unitary development plans for their areas, as was proposed by the Commission in the draft recommendation, the strategic interests of the remainder of Kent would be better served by a structure plan for the whole of the rest of the county area. There would be a need for the new authorities to make suitable joint arrangements for the purpose. Each would also become the mineral planning authority for its area. In each case, strategic policies agreed in the joint structure plan would provide the context for the function.
- 30 For consultation purposes, the Commission adopted the following as its draft recommendation:

DRAFT RECOMMENDATION

The new authorities for North West Kent and the Medway Towns should prepare unitary development plans for their areas, within the framework of the Secretary of State's supplementary strategic guidance for the East Thames Corridor. The new authorities should also be mineral and waste planning authorities.

The system of structure plan and local plans should remain in the rest of the county.

OTHER SERVICES

- 31 The Secretary of State's Policy Guidance advises the Commission that, where it recommends unitary authorities, the aim should be to make the individual authorities responsible for all local government services. The exception is, as noted above, law and order services. The Guidance further advises the Commission that it should recommend shared arrangements for particular functions where a satisfactory structure is unlikely to be achieved without them. The Commission has had regard to these aspects of the Guidance in the conduct of its review of Kent.
- 32 The Commission was satisfied that the new unitary authorities it canvassed – both in its draft recommendation and in its alternative structures – would command sufficient resources to carry out the main local government services other than law and order, whether directly or by contracting out to other local authorities or to the private sector.
- 33 The Commission was also satisfied that the local authorities in the area would be in a position to put in place adequate structures for any shared arrangements necessary to function efficiently. No draft recommendations were therefore made in this respect. However, the Commission expressed its expectation that the new authorities should work closely together to ensure that specialist expertise would not be unnecessarily broken up. In particular, it was concerned that the existing levels of efficiency and effectiveness in the provision of relatively small scale but important functions, such as trading standards, archive provision and emergency planning, would not be reduced by reorganisation.

ELECTORAL ARRANGEMENTS

- 34 The Commission examined alternative means by which local democratic control and accountability could be made secure within any new structure. The present electoral arrangements in Kent create an element of confusion in that some councils hold elections most years (elections by thirds), whereas the others have elections for the whole council every four years. Furthermore some wards return either one, two or three councillors. The Commission generally supports the view of the Committee of Inquiry into the Conduct of Local Authority Business 1986 that there should be one councillor for each electoral ward, and that the whole council should be elected together once every four years.

- 35 The Commission's report, *Renewing Local Government in the English Shires*, sets out the Commission's view that the ratio of local residents to councillors should generally be around 4,000 to 1. This ratio is midway between the existing ratios for district and for county councils and is in line with that of the existing metropolitan districts. It is not a hard and fast rule and the Commission applied it sensitively to its draft recommendations, taking into account local custom and practice and any special local needs, especially in very rural areas. Nevertheless, it reflects the Commission's wish to see a different role for councillors with more back-up made available to assist them in carrying out their demanding task.
- 36 The Secretary of State's Policy Guidance states that the Commission should take account of local practice and that 'where a new authority covers the area of an existing county or district the Commission should recommend that the wards or electoral divisions should be transferred to the new authority'. The Commission adopted this approach in determining the electoral arrangements associated with its draft recommendation and alternative structural options.
- 37 The Commission's draft recommendations for electoral arrangements were as set out below:

DRAFT RECOMMENDATION

- (i) The unitary authority for North West Kent should comprise 44 councillors. They would represent 32 wards based on the current district wards, but with the adjustments set out in appendix B of the Commission's consultation report.
- (ii) The unitary authority for the Medway Towns should comprise 68 councillors. They would represent the current 34 district council wards for the area, with two councillors for each ward.
- (iii) Elections to these two authorities should be held every four years, with all the councillors being elected at the same time.
- (iv) Electoral arrangements in the rest of the county would remain unchanged.

- 38 Details of electoral arrangements, including those for the alternative proposals, were given in the Commission's consultation report, *The Future Local Government of Kent*.
- 39 The Commission proposes to review electoral arrangements generally throughout England during the next five years as part of the periodic electoral review it is required to undertake.

LOCAL COUNCILS

- 40 The Commission considered that the structure of local government in Kent should build on the strong sense of identity with immediate neighbourhoods that was reflected in the MORI survey. It received a number of submissions suggesting how this might be achieved.

- 41 Since parish and town councils can be an important reflection of people's sense of identity with their community, the Commission believes that their role should be enhanced. This should include regular meetings with the principal local authorities, improved consultation on planning and highways issues and, where there is a demand from a local council, devolved management of local facilities such as sports grounds and libraries. Members of parish and town councils would also be well placed to help residents secure assistance or redress when faced with problems about local services. These proposals enlarge on existing practice, and reflect suggestions in many of the submissions to the Commission both nationally and locally.
- 42 The Commission does not envisage an increase in the statutory powers of parish and town councils, nor the establishment of another tier of local government. However, the Commission does see an important role for parish and town councils in empowering local communities. The Commission agreed with many of its respondents that a clear consultative framework should be established between principal local authorities and parish and town councils. This framework, or 'local charter', could ensure that parish and town councils have rights to the following:
- (i) a clear statement of matters affecting the local community upon which they will be consulted, with the areas for consultation being widely drawn;
 - (ii) sufficient information from principal authorities about local matters on which local councils' views have been requested;
 - (iii) the right to a written explanation from a principal authority if it does not accede to the views of the parish or town council, as it may legitimately decide;
 - (iv) regular meetings between representatives of the principal authorities and the parish and town councils to discuss matters of common interest.
- 43 The Commission recognised that the enhanced role it proposed would require the creation of parish or, in the case of large towns or cities, neighbourhood councils for areas of the county that are currently unparished. At present Kent has a total of 284 parish and town councils covering some 44 per cent of the population and 89 per cent of the land area.
- 44 The Commission had received proposals for the creation of a number of parishes in the districts of Canterbury (Herne and Broomfield), Dover (Deal town, Dover, Great Mongeham and Walmer), Shepway (Folkestone), and Thanet (Margate and Ramsgate).
- 45 The promoters also sought the establishment of parish or town councils. However, the Commission has no power to recommend the establishment of parish or town councils; that is the prerogative of the Secretary of State or the appropriate district council. Nor may the Commission make recommendations as to the electoral arrangements within any parished area for which a parish council has yet to be created. Nevertheless, the Commission felt it appropriate to indicate in its consultation report what had been suggested to it in respect of such matters, and to seek the views of the public.
- 46 The Commission noted that, with electorates in excess of 21,000, 31,000, 35,000 and 29,000 respectively, the populations of Dover, Folkestone, Margate and Ramsgate would be beyond the maximum populations indicated in Department of the Environment

Circular 121/77. Nevertheless, in view of the local support expressed for the proposals at the first stage of the review, and the historic tradition of each of these areas as Cinque Ports (or Proper Limbs), the Commission considered that it should consult on the creation of parishes for these areas. In each case where they were created, the new parish or town councils would exercise the rights, and discharge the obligations, of the Cinque Ports.

DRAFT RECOMMENDATION

That parishes should be created in the areas of Herne and Broomfield, Deal town, Dover, Walmer, Great Mongeham, Folkestone, Margate and Ramsgate.

- 47 The Commission set out in its consultation report possible warding and electoral arrangements.
- 48 With no evidence of strong local demand for the parishing of any other areas of Kent, the Commission did not undertake any further consultations on the subject. Nevertheless, it indicated that it would welcome comments about parishing from residents. Should it have become evident that there was a demand for parishing generally, the Commission indicated that it would recommend to the Secretary of State that it should be directed to undertake an area electoral and boundary review, with a view to considering the parishing arrangements in the county.

DRAFT RECOMMENDATION

- (i) If there is clear local support for parishing areas in Kent which are not currently parished, the Secretary of State be invited to direct the Commission to undertake a review in which the scope for further parishing can be considered.
- (ii) There should be an enhanced consultative role for all town and parish councils.
- (iii) Elections for parish and town councils should, whenever possible, be held at the same time as elections for principal authorities.

3 RESPONSES TO CONSULTATION

- 49 The Commission published its consultation report, *The Future Local Government of Kent*, on 13 June 1994. The report set out the Commission's draft recommendations for the future structure of local government in the county, and other relevant matters. A nine-week consultation period then began, ending on 15 August 1994. During this period, the Commission sought to identify the views of local interests and residents on the preliminary conclusions which it had reached on the balance of evidence then available.
- 50 The scope of the Commission's public consultation exercise was unprecedented in local government terms and comprised a number of elements. Copies of the consultation report were sent to organisations which wrote to the Commission during the initial consultation stage, to appropriate representative organisations, and to the organisations and individuals listed in annex A of the Secretary of State's Procedure Guidance. Copies were also made available to local residents on request.
- 51 To ensure that the Commission received the views of as wide a variety of respondents as possible, people's preferences were sought by means of a leaflet which summarised the Commission's draft recommendations and its alternative structural options. A detachable questionnaire invited residents to indicate which of the options they preferred or whether they would prefer a different option.
- 52 The Royal Mail was commissioned to deliver the leaflet to households throughout the county. This was an ambitious task and some difficulties were experienced. Every effort was made to ensure that households received the leaflet. The Commission is particularly grateful to local authorities and others who helped to ensure that the difficulties were remedied. The Commission advertised extensively in the local press, drawing residents' attention to its draft recommendations and alternative structural options. The Commission is satisfied that the residents of Kent have had the opportunity to make their views known.
- 53 The Commission recognises that the response to the leaflets can give only a broad indication of the views of the public. In order, therefore, to obtain the views of a representative cross-section of the county's population, MORI was commissioned to undertake a survey of over 4,300 residents during the latter part of the consultation period.
- 54 The Commission is required to consult on its draft recommendations and has chosen these approaches to best assess the reaction of the public to its proposals. In response to its consultation report, the Commission received over 53,000 written representations from residents, local authorities, Members of Parliament and public and private sector organisations. These included individual letters, petitions and completed questionnaires. The Commission recognises that some residents and respondents may have been influenced by the publicity of local authorities and others. The consultation programme was not a referendum, but all representations, irrespective of their source or nature,

have been carefully considered by the Commission and have been taken into account in its final recommendations. As required by the Secretary of State, a list of respondents is available from the Commission on request and all representations may be inspected at the Commission's offices. The Commission is most grateful to all those who took the trouble to give their views on the future structure of local government of Kent.

RESIDENTS' RESPONSES DIRECT TO THE COMMISSION

- 55 Representations from members of the public were made through some 2,000 letters, over 29,000 completed questionnaires (representing over 48,000 individuals' views) and some 3,000 petitions or proforma letters. The response represented some 3.5 per cent of the population of the county, although some residents may have written to the Commission and also signed a petition. The highest rate of response was from residents in Gravesham and Sevenoaks districts. NOP was commissioned to tabulate responses on behalf of the Commission, and these tabulations were published shortly after the conclusion of the consultation period. Copies may be obtained from NOP, Tower House, Southampton Street, London WC2E 7HN, price £5.00.
- 56 Responses across the county as a whole are summarised in figure 1. A district breakdown of these views is set out in figure 2.

Figure 1
RESPONDENTS' VIEWS ON STRUCTURAL CHANGE: AN OVERVIEW

Percentage of responses	
Preferred Structure	Response
No change (option four)	67
Two unitary authorities plus two-tier (option one)	14
Seven unitary authorities (option two)	11
Six unitary authorities (option three)	5
Multiple choice	1
Other	2
Total	100
(number)	(50,326)

Source: NOP tabulations, September 1994

Notes: In a number of responses, particularly questionnaire responses, respondents did not express a preference for a single structural option: these the Commission classified as multiple choice returns. This table includes responses from organisations and local interests as well as individual residents (both leaflets and letters) together with out of county responses. It excludes proforma letters and petitions (which were also taken into account).

Figure 2
RESPONDENTS' VIEWS ON STRUCTURAL CHANGE: DISTRICT LEVEL ANALYSIS

Number and percentage of responses						
	Option 1	Option 2	Option 3	Option 4	Other	Total
Ashford	464 14%	156 5%	135 4%	2,389 74%	91 3%	3,235 100%
Canterbury	682 19%	354 10%	124 3%	2,290 63%	164 5%	3,614 100%
Dartford	184 8%	112 5%	355 15%	1,750 72%	44 -	2,445 100%
Dover	569 18%	350 11%	100 3%	2,042 64%	109 4%	3,170 100%
Gillingham	337 12%	233 8%	49 2%	2,139 75%	99 3%	2,857 100%
Gravesham	216 5%	111 3%	127 3%	3,437 86%	84 3%	3,975 100%
Maidstone	504 10%	411 8%	293 6%	3,667 73%	131 3%	5,006 100%
Rochester upon Medway	722 23%	365 12%	50 2%	1,866 60%	91 3%	3,094 100%
Sevenoaks	552 10%	910 17%	496 9%	3,330 61%	196 3%	5,484 100%
Shepway	697 21%	203 6%	154 5%	2,194 65%	120 3%	3,368 100%
Swale	378 10%	1,309 34%	156 4%	1,853 49%	109 3%	3,805 100%
Thanet	732 21%	490 14%	101 3%	1,778 50%	449 12%	3,550 100%
Tonbridge & Malling	377 10%	207 5%	231 6%	2,908 76%	112 3%	3,835 100%
Tunbridge Wells	404 15%	174 6%	190 7%	1,895 70%	44 2%	2,707 100%
County total	6,818 14%	5,385 11%	2,561 5%	33,538 67%	1,843 3%	50,145 100%
Out of county	25 14%	18 10%	10 6%	108 60%	20 11%	181 100%

Source: NOP tabulations, September 1994

Notes: See notes to figure 1. Percentages may not add up to 100 per cent due to rounding of individual entries.

- 57 Of respondents who wrote direct to the Commission, over 33,000 (67 per cent) preferred option four (no change to the present two-tier structure of local government). It was the most popular option in all districts, with the highest levels of support being in Gravesham (86 per cent), Tonbridge & Malling (76 per cent) and Gillingham (75 per cent). The lowest support for no change was in Swale (49 per cent) and Thanet (50 per cent).

- 58 The Commission's draft recommendation – unitary authorities for North West Kent (Dartford and Gravesham) and the Medway Towns (Gillingham and Rochester upon Medway) – received support from under 7,000 respondents (14 per cent). Support was highest in Rochester upon Medway (23 per cent) and two districts which would have retained two-tiers under the option – Shepway and Thanet (21 per cent in each case). Apart from Rochester upon Medway, there was little support in the other three districts where unitary authorities were proposed – Dartford (8 per cent), Gillingham (12 per cent) and Gravesham (5 per cent); responses from Dartford and Gravesham implied a very low popularity for this option.
- 59 Support for the structure of seven unitary authorities (option two) was limited to 11 per cent of respondents; Swale registered the highest level of support (34 per cent), this being the only option canvassed by the Commission which included unitary status for the district of Swale on its present boundaries. Only 5 per cent of respondents preferred the six authority structure (option three), the most support being registered in Dartford (15 per cent), which under this structure would combine both with Gravesham Borough and with the northern parishes of Sevenoaks District Council, including Swanley.
- 60 Thus, *across the county as a whole*, 81 per cent of respondents preferred the present two-tier structure, or a modified version of it, while 16 per cent preferred either of the county-wide unitary structures canvassed by the Commission.
- 61 In order to consider residents' preferences *in their own district*, the Commission also added together support for unitary structures or for no change. For this purpose, support for unitary structures in the four districts in north-west Kent has been calculated by adding together the support for options one, two and three; in the rest of the county, support for unitary structures comprises total support for options two and three. Support for no change is limited to option four in the case of the four districts in north-west Kent, but comprises support for both options one and four in the rest of Kent. For their own district, 23 per cent of residents in the four north-western districts preferred one of the options involving unitary structures while 74 per cent preferred no change; in the rest of Kent, 18 per cent of residents preferred unitary structures for their districts while 79 per cent preferred no change.
- 62 In addition to these responses tabulated by NOP, further responses totalling some 3,000 were received through petitions and proforma letters. A petition with 2,015 signatures and 180 proforma letters supported the parishing of Folkestone. Another petition, with 204 signatures, opposed the incorporation of the northern parishes of Sevenoaks into a North West Kent unitary authority. A number of petitions, with a total of 128 signatures, were in support of option four (retaining the current two-tier structure across Kent). A number of smaller petitions and other proforma letters were received which expressed a range of views.
- 63 The Commission paid close attention to all the views expressed during the consultation programme. However, it was unwilling to draw firm conclusions about the attitudes of local residents from this part of the consultation programme alone since it recognised that respondents were not necessarily representative of public opinion as a whole. The

same issue of representativeness applied to local authorities' consultation programmes. Some local authorities issued their own publicity, in some cases including leaflets, which set out their views and provided information on local government structures. Some also undertook surveys and, where information was provided to the Commission, this was also taken into account. However, in order to obtain a more representative sample of public opinion, the Commission engaged MORI to undertake an independent survey.

MORI SURVEY

- 64 MORI interviewed 4,376 residents, aged 18 and over, throughout Kent. All interviews were conducted between 14 July and 15 August 1994. Those interviewed were shown a copy of the Commission's household leaflet, summarising the options for structural change (with text indicating the Commission's draft recommendation having been deleted). A summary of the MORI survey findings, together with the questionnaire used, is given in appendix B. A copy of the full tabulations may be obtained direct from MORI, 32 Old Queen Street, London SW1H 9HP, price £10.00.
- 65 All respondents were asked two questions about their preferences: first, they were asked which of the Commission's options they preferred (Q5 in the questionnaire); second, they were asked what other options they would prefer to those specified in the leaflet (Q10 in the questionnaire). By taking account of people's responses to both questions, MORI prepared a summary which, in their opinion, best reflected the views and preferences of the public.
- 66 MORI's methodology was as follows. Those who selected one of the Commission's options as their first preference, and then went on to say that they did not have any other preference when offered an open choice, were described as 'firm' supporters of that option. Those who, having given their preference for one of the Commission's options, then went on to say there was actually another structure that they would prefer were reallocated to take account of this information. There were also those who expressed no view or preference in response to either question – these remained categorised as 'don't know'. Figure 3 sets out the results of this analysis across the county and within individual districts.

Figure 3
SUMMARY OF RESIDENTS' PREFERENCES ON STRUCTURAL OPTIONS - 'FIRM' SUPPORT

Percentage of respondents

	Option one	Option two	Option three	Option four	No need to change	Other	Don't know
KENT	8	10	6	41	10	7	18
Ashford	8	7	5	39	9	3	29
Canterbury	4	7	8	39	15	14	13
Dartford	10	11	9	43	6	8	13
Dover	10	8	5	35	13	8	21
Gillingham	16	10	5	39	4	2	24
Gravesham	8	3	3	59	11	4	12
Maidstone	8	14	6	36	9	7	20
Rochester upon Medway	15	9	5	40	7	6	18
Sevenoaks	5	12	14	44	10	7	8
Shepway	7	5	5	37	10	13	23
Swale	4	20	6	39	9	4	18
Thanet	7	14	5	36	7	16	15
Tonbridge & Malling	5	9	6	44	13	6	17
Tunbridge Wells	9	7	9	45	8	5	17

Source: MORI, September 1994

Note: The number of residents expressing a preference for option four and for 'no need to change' may be added together to form the total 'no change' preference.

- 67 Figure 3 shows a pattern of residents' preferences which broadly reflects that of respondents who wrote to the Commission. Over half the residents questioned (51 per cent) preferred no change to the existing two-tier structure throughout the county (that is either option four or 'no need to change'). Support is clearly highest in Gravesham (70 per cent), as it is among respondents who wrote direct to the Commission. It is lowest in Gillingham and Thanet (43 per cent in each case).
- 68 Support for the Commission's draft recommendation for the establishment of two unitary authorities in North West Kent and the Medway Towns, with no change elsewhere, averaged eight per cent across the county. It was highest in three of the four districts where unitary authorities were proposed - Gillingham (16 per cent), Rochester upon Medway (15 per cent), and Dartford (10 per cent) - along with Dover (also 10 per cent). Support was lowest in Canterbury and Swale (4 per cent in each case).
- 69 Support for the two county-wide unitary structures canvassed by the Commission was of a similar order to that for the draft recommendation: 10 per cent preferred seven unitary authorities (option two) and 6 per cent preferred six unitary authorities (option three). Support for option two was highest in Swale (20 per cent) and lowest in Gravesham (3 per cent); in both instances this was also the case with direct

representations. Support for option three was highest in Sevenoaks (14 per cent), where Swanley and the northern parishes would have formed a unitary authority with Dartford and Gravesham. It was lowest in Gravesham (3 per cent).

- 70 In all districts, the level of residents' support for no change to local government structure within that district exceeded the total support for all the other options canvassed by the Commission.

LOCAL AUTHORITIES

- 71 Figure 4 summarises the views of the principal local authorities at the end of the consultation period, as understood by the Commission.

Figure 4
LOCAL AUTHORITIES' PREFERENCES

Authority	Preference
Ashford Borough	Option four.
Canterbury City	Option two.
Dartford Borough	Option three.
Dover District	Is opposed to option one, but is unable to secure agreement on any other option.
Gillingham Borough	Unitary authority for the Medway Towns as 'identified within the Commission's preferred option' but 'continues to believe in the merit' of option two.
Gravesham Borough	Option four.
Maidstone Borough	Option two.
Rochester upon Medway City	Option two.
Sevenoaks District	Option two.
Shepway District	Option four, in absence of unitary authority on its own boundaries.
Swale Borough	Option two.
Thanet District	Unitary authority on its own boundaries.
Tonbridge & Malling Borough	Option four.
Tunbridge Wells Borough	Option two.
Kent County	Option four.
Kent Branch of the ADC	No joint submission made.

Source: Local authorities' submissions

- 72 Of the fourteen district councils, six expressed a clear preference for option two (the seven-council unitary option originally put forward by the Kent ADC); four preferred option four (no change); Dartford, which under this option would incorporate the

northern parishes of Sevenoaks, preferred option three (the six-council unitary option); Thanet preferred a unitary authority on its existing boundaries; Gillingham preferred a link with Rochester upon Medway as set out in option one, while continuing to believe in the merit of option two; and Dover expressed no preference. The County Council remained opposed to any change to structure. No local authority categorically preferred, as its first choice, option one (the Commission's modified two-tier draft recommendation). Particularly strong opposition to option one was voiced by Gravesham Borough Council.

- 73 The national Association of District Councils hoped 'that the Commission will recommend to the Secretary of State a structure of local and district-based unitary authorities for the whole of Kent', and of the options put forward by the Commission, supported 'that for seven unitary authorities'. The Association of County Councils supported the retention of the two-tier structure in Kent.

LOCAL COUNCILS

- 74 Over 130 parish councils wrote to the Commission during the consultation period, out of a total of 284 in the county. Three per cent supported option one, 16 per cent preferred option two, 4 per cent favoured option three, and 64 per cent preferred option four (no change) with 8 per cent expressing another view and 5 per cent expressing no preference. The Kent Association of Parish Councils commented: 'There has emerged, since the Association's preliminary submission to the Commission, a perceived shift in attitude. As the retention of the existing structure constitutes a valid option, that possibility has enjoyed a further strengthening of support, while support for alternative options has diminished. However, among other options, the most favoured remains that which creates seven unitary authorities'.

OTHER CONSULTEES

- 75 Thirteen of the fifteen MPs with Kent constituencies have made written submissions in response to the Commission's draft recommendations. Seven expressed some support for the seven unitary authorities option (option two). There was also some support for the other three options.
- 76 Almost two-thirds (64 per cent) of individual businesses which wrote to the Commission expressed support for option four (no change), compared with 18 per cent which supported option two (seven unitary authorities). The remaining 18 per cent preferred a variety of alternative options. The support of local chambers of commerce was generally divided between the unitary options and option four (no change), but the Kent Chamber of Commerce and Industry (KCCI) expressed a preference for option four with improved devolution of services. The KCCI also canvassed its members and received responses from 177 companies: 59 per cent supported option four, 21 per cent option three, 14

per cent option two, and six per cent option one. The KCCI was, however, cautious about putting too much weight on a survey which reflected the views of only nine per cent of its membership.

- 77 Other organisations representing business interests across parts of the county tended to favour a two-tier structure, often expressing the need for a strategic body in Kent. The CBI (Southern and South Eastern Regions), for example, concludes: 'The business community needs a structure of local government which can provide effective and efficient local services while at the same time giving opportunities for involvement in a decision-making process that embraces both local and strategic issues such as land use planning and economic development. The CBI believes beyond doubt that this can only take place within a two-tier structure across the whole of Kent'. The Kent Training and Enterprise Council was similarly concerned about strategic and economic planning and did 'not believe that this task could be satisfactorily undertaken by new unitary authorities individually or through some form of ad hoc consultative, inter-authority mechanism'; it expressed willingness, in the event of it becoming 'the only pan-Kent organisation concerned with the overall economic development of the county', to enter into discussions to establish appropriate arrangements.
- 78 Few organisations concerned with health provision wrote to the Commission during the consultation period, although more wrote during the initial stage of the review. Support for no change was expressed by one-third of health respondents at that time, while about a half did not express a particular preference for local government structure. The remainder preferred a unitary solution of some kind. At the initial stage of the review, both the Health Commissions in Kent opposed structural change – a view that the West Kent Health Authority confirmed during the consultation period.
- 79 While relatively few voluntary organisations wrote during the consultation period, the majority of those which wrote during the initial stage supported no change. Of the trades union organisations which commented during stages one and three of the process, the majority expressed such a preference. The TUC (Southern and Eastern Regional Council) commented: 'We are by no means convinced that the case for change has been made'.
- 80 Some respondents commented on the operation of the present two-tier structure. The county tier could be more streamlined, it was argued, in order to concentrate on strategic issues, on the basis that district councils would provide most services, either directly or on an agency basis. References were also made to the desirability of devolved decision-making and for co-ordination between service providers. The present structure was capable of improvements in the management and delivery of services and information provision. The review had helped to focus attention on areas where improvements could be made to existing arrangements and the action that could be taken on such matters.

4 THE COMMISSION'S CONCLUSIONS

- 81 The Commission has reassessed its draft recommendations in the light of its consultations and the results of the MORI opinion survey undertaken during the consultation period.
- 82 In making any recommendation to the Secretary of State, the Commission is statutorily required by section 13(5) (a) and (b) of the 1992 Act, to have regard to the statutory criteria and to the Secretary of State's Policy Guidance (in particular the issues of identity, accessibility, responsiveness and democracy). It has carefully considered and weighed all the evidence and opinions which it has received against these criteria.
- 83 This chapter summarises the Commission's general conclusions on the application of the statutory criteria in Kent, and the costs and savings of the main structural options. These options are then considered in the light of local opinion, taking account of the further evidence and argument submitted to it following publication of its report, *The Future Local Government of Kent*.

THE IDENTITIES AND INTERESTS OF LOCAL COMMUNITIES

- 84 Kent has a distinct settlement pattern based on small towns and villages. Outside the main urban area of the north-west, which comprises the eastern end of a linear urban settlement stretching from London along the south bank of the Thames to Gillingham, there are no large towns or cities. There is instead a pattern of small-to-medium towns distributed across the county. This settlement pattern is in part a product of the peninsular nature of the county, with its small harbours and coastal resort towns. It also reflects the absence of heavy industrialisation in the nineteenth century. Of the county's towns outside the north-west, only Maidstone has a population exceeding 50,000. There are fourteen towns with a population of between 15,000 and 50,000. These include the city of Canterbury, which was the only county borough in Kent under the pre-1974 structure, but whose population even today is only 30,000.
- 85 The pattern appeared to the Commission to be relatively well suited to the structure of local government introduced in 1974, because it allowed district boundaries to be drawn so as to accommodate the larger towns with their hinterlands, without the threat of domination of rural communities by city interests, and without forcing together communities which had little in common.
- 86 To help the Commission during the initial stage of the review to assess patterns of community identity and interests, and the strength of personal affiliation with various divisions of local government, however, MORI was asked to undertake a community identity survey. The results are summarised in appendix A.

- 87 The survey found that throughout Kent, community identity is generally strongest in respect of the local neighbourhood or village, followed by the home town or nearest town. Attachment to local government areas, whether county or district, was less pronounced.
- 88 Nevertheless, there were some significant variations across the county. Identification with district council areas peaked in Thanet (80 per cent identified strongly); next highest was in Gravesham (58 per cent). In Ashford, strong affinity was at just 37 per cent, while it was also below average in Sevenoaks (38 per cent), Dover (41 per cent) and Tonbridge & Malling (42 per cent). Overall, 51 per cent of those surveyed said they identified strongly with their district area, against a national average of 55 per cent.
- 89 The county council area attracted strong identification from as many as 65 per cent in Gravesham and 67 per cent in Thanet. Around two in five identified strongly with the county area in Canterbury (41 per cent), Dover (42 per cent), Rochester upon Medway (40 per cent), Sevenoaks (44 per cent) and Tunbridge Wells (44 per cent). Overall, 52 per cent of those surveyed identified strongly with the county council area of Kent. This is broadly in line with the national figures.
- 90 The identification pattern appears generally to reflect the settlement pattern, and to suggest that a structure of local government which also reflected the individual settlements would best satisfy the criterion of reflecting community interests and identities. The existing district council arrangements seemed to the Commission to achieve that objective rather well. But the district councils exercise only some local government functions. The most significant, at least in terms of expenditure, are exercised by the County Council.
- 91 The Commission remained concerned as to whether a county-wide upper tier of local government in Kent could be expected to reflect community identity adequately. Notwithstanding the peninsular character of the county, which should assist in sustaining a sense of community of identity, there was concern that in representing and serving a population of around 1.5 million, and with a councillor:elector ratio of 1:11,750, there was a high risk that the county tier would become too remote from the concerns of its citizens. The Commission recorded in its consultation report some of the concerns expressed to it by district councils about the perceived remoteness of county-wide government, and its apparent inability or unwillingness to address issues which were of primary concern to the district councils but outside their own powers to resolve.
- 92 The Commission accepts that these may to some extent be purely operational problems, which could be overcome by better cooperative working: between the county and district councils, and between those councils and parish councils and other interests. There is already wide experience of productive collaboration between councils in Kent, and the local government review has itself prompted fresh thinking on joint working, particularly as a means to enhance community influence on decision making.

- 93 Nonetheless, given the patterns of community identity suggested by the MORI survey, a two-tier structure is almost bound to provide a better reflection of community identity at district than at county level. A structure of unitary councils at the same local level would reflect that strength of community interest and identity, bringing local government closer to the people. But the question for the Commission has been whether such a structure would also secure effective and convenient local government.

EFFECTIVE AND CONVENIENT LOCAL GOVERNMENT

- 94 The Commission has assessed how particular local government services and functions are presently being delivered or exercised through the two-tier structure in Kent, and what might be the implications for each of them of moving to unitary local government structure. The concern most commonly expressed to the Commission has been the risk of fragmentation of services presently provided on a county-wide basis, and the loss of a county-wide strategic vision and capability. Against that, the Commission has needed to weigh the advantages that could flow from a unitary structure in bringing together related functions which are presently divided between county and district councils.
- 95 **Care in the community.** The Commission believes that one test of the effectiveness of a local government structure is the extent to which it will facilitate effective working relationships between social services departments, housing departments and health authorities. This is essential to the achievement of such important current initiatives as Care in the Community and Health of the Nation. It is also vital in order to coordinate measures for crime prevention and to overcome social alienation, which require active cooperation between what in Kent are currently district services (housing, environmental health, leisure, recreation and local planning) and county services (social services, education, strategic planning, police, highways and transportation). The structure also needs to provide a convenient and effective basis for involvement with other public bodies (such as health trusts and health authorities, and training and enterprise councils), and with the churches, voluntary organisations and the business community. Substituting a unitary structure offers an opportunity for better integration of local government functions (although bringing them together within one organisation does not of itself, of course, guarantee any functional integration); but the more successfully such a unitary structure reflected community interests and identities, the more likely it would be to fragment the county-wide view. It would run the risk of seeking vertical integration of related services at the expense of the horizontal integration of the existing county-wide services.
- 96 **Land-use planning, highways and transportation** are functions with territorial implications that go beyond the boundaries of the existing district councils in Kent: indeed, in some respects they go well beyond the county's boundaries. The Channel Tunnel and the high speed rail link, the motorway network and the long term development and regeneration of the Thames-side areas running into London, are examples. The three functions are closely interrelated at a strategic level, yet have

elements which can be delivered locally within an agreed strategic framework. The statutory structure plan, which presently is prepared and updated on a county-wide basis, provides the strategic framework for all decisions on land-use. With its draft recommendation for two unitary councils, for North West Kent and the Medway Towns, with retention of two-tier local government elsewhere in the county, the Commission also recommended a different strategic planning arrangement, in which the two unitary councils would come out of the Kent structure plan and instead prepare their own unitary development plans within the framework of the Government's strategic guidance for (what was then) the East Thames Corridor (since relaunched as the Thames Gateway). This was based upon the Commission's perception that there were already strong strategic interdependencies between those two areas and the rest of the Corridor, and that these would increase steadily with the realisation of the Government's plans.

- 97 However, almost all the representations that were made to the Commission on planning issues argued for the retention of two tiers of plan across the county as a whole, whatever structural changes might be recommended. Respondents argued in particular that the Commission's proposal would mean that county-wide problems would not be adequately addressed, because of the close interdependency between the areas proposed for unitary councils and the remainder of Kent. The area covered by the guidance would not follow the boundaries of the two unitary councils, and the guidance was likely to be a 'one off' operation, unlike the strategic guidance issued in the metropolitan areas which was subject to regular review. These fears were reinforced when the Secretary of State for the Environment subsequently published his 'planning principles' for Thames Gateway in September 1994, which would provide only a relatively loose strategic framework for the preparation of unitary development plans by the two proposed unitary councils. The Commission acknowledges the force of these arguments, but it has some residual concern as to the capacity of local government acting through a two-tier structure in Kent, and through existing planning mechanisms, to address comprehensively the long term problems of the Thames Gateway.
- 98 Similar fears were expressed in relation to the Commission's options two and three for county-wide unitary structures, where it had been proposed to retain structure planning for the remainder of the county area, with responsibility for the function being shared between the unitary authorities through a system of joint arrangements. Respondents argued that this potential fragmentation of the strategic function was a strong reason for resisting a move to unitary structures and retaining the strategic capacity of an elected county-wide authority. If, however, there was to be a county-wide unitary structure, the Commission was urged to include the areas of the two proposed unitary councils for North West Kent and the Medway Towns in a Kent-wide structure plan.
- 99 **Heritage services.** Representations in relation to services such as libraries, archives, museums and similar functions have generally argued the case for retaining the county-wide basis of the present arrangements, and especially for maintaining existing records and archives. To some extent, this stems from a genuine fear of what change might bring, such as a reduction in the level of funding for libraries, or the splitting up

of collections that have taken time and dedication to assemble. There has also been concern that a move to unitary authorities would require an extensive network of joint arrangements to sustain existing specialist services, and would also increase the number of contact points.

- 100 **Environmental issues.** As with planning, highways and transportation, the Commission sees potential advantages in a unitary local government structure in drawing together in the one authority all local government services with environmental protection implications. Unitary authorities of sufficient size in terms both of population and territory would have the capacity to develop effective environmental programmes, and to liaise with other statutory agencies such as the National Rivers Authority and the proposed Environmental Protection Agency.
- 101 **Education.** Many respondents expressed concern at the prospect of breaking up the existing educational services in Kent. Underlying some of their concerns was the feeling that the education system had already undergone considerable change and disruption, and that further change was unwelcome in the absence of a convincing case for it. There is some opting out by secondary schools in Kent, but the County Council nonetheless maintains a range of backup and specialist services. There is also some concern about the capacity of smaller local authorities to provide a comprehensive range of specialist educational services, including in particular youth and adult services.
- 102 Kent has seen several examples of collaborative working to overcome some of the problems inherent in a two-tier system of local government. Many of these pre-date the current review, and not all (highways maintenance is a commonly cited example) have had an easy history. Partnership arrangements such as jointly operated one-stop shops for citizens, and the combining of resources and energy with the private sector and other agencies to combat common problems, as has occurred with certain economic development initiatives, can go a long way to improving the quality of service and representation to which citizens are entitled. They may not sharpen accountability – indeed they may blur it – and for some services they may represent a second-best to what might be achieved by a single unitary authority with adequate resources, political will and good management. But they do offer considerable potential to enhance the performance of existing two-tier structures, and this issue is considered further at paragraph 131.

COSTS AND SAVINGS

- 103 The Commission is also required to consider the change in overhead costs which may result from changes in the structure of local government. This is not a straightforward matter and the issues concerned are discussed more fully in the Commission's report, *Renewing Local Government in the English Shires*. Figure 5 below shows existing local government indirect expenditure (administrative overheads), based upon financial material provided by the local authorities in Kent.

Figure 5

ESTIMATE OF EXISTING LOCAL GOVERNMENT INDIRECT EXPENDITURE

	£ million
Staff costs (including associated overheads)	126
Accommodation	10
Information technology	32
Costs of democracy (members allowances etc)	1
Total of existing indirect expenditure	169

104 The Secretary of State's Policy Guidance requires the Commission to look only at indirect expenditure, since the level of direct service provision is largely independent of local government structure. Indirect expenditure represents only some 10 per cent of total local government spending in Kent. Figure 6 shows the Commission's estimates of annual savings and transitional costs of each of the structural options detailed in its consultation report.

105 The county and district councils in Kent provided the Commission with their own estimates of the financial consequences of a range of structural alternatives. However, in order to secure a consistent approach, the Commission has applied the financial methodology developed by Ernst & Young and the Commission, as published in December 1993, to produce the estimates in figure 6. The figures are expressed as a range in order to reflect the broad nature of the estimates and assumptions involved. The estimates for the Commission's draft recommendation (two unitary authorities and no change elsewhere) shown in figure 6 differ from those given in appendix A to the Commission's consultation report. These changes reflect views expressed to the Commission during the consultation period that the cost of replicating county services and the resultant diseconomies in the remaining County Council would be greater than the Commission originally estimated.

Figure 6

COMPARISON OF THE INDIRECT COSTS OF THE MAIN STRUCTURAL OPTIONS AGAINST EXISTING ARRANGEMENTS

Option	Annual savings/costs £ million	Transitional costs £ million	Payback period Years
Two unitary authorities and no change elsewhere (option one).	From £1m cost to £3m savings	£6m to £10m	At least 2 years. In the worst case, transitional costs would never be recovered.
Seven unitary authorities (option two).	From £1m to £9m savings	£34m to £38m	From 4 years to 38 years.
Six unitary authorities (option three).	From £7m to £15m savings	£42m to £46m	From 3 years to 7 years.
No change (option four).	—	—	—

106 The detailed figures on which the Commission's estimates are based have been published separately. Copies have been sent to the Secretary of State and to the principal authorities in the review area. Additional copies are available from the Commission on request.

CONCLUSIONS

107 In the light of all the further evidence it received during the extensive consultations on its report, *The Future Local Government of Kent*, the Commission has reconsidered its draft recommendations and alternative structures.

THE MAIN STRUCTURAL OPTIONS IN KENT

108 While there is a whole range of possible boundary and other variables within any one structure of local government in Kent, the Commission considers that it has focused on the main realistic options which are available in the county. This is in part reinforced by the fact that only 3 per cent of all respondents as identified in NOP tabulations, indicated preferences other than the Commission's four options. Similarly, few residents, according to MORI, preferred other options.

109 The consultation report set out the Commission's thinking, in terms of the statutory criteria and the Government's Guidance, behind each of the options canvassed. In summary, **option one**, the Commission's draft recommendation, recognised the distinctiveness of north-west Kent, where the case for unitary local government appeared to the Commission to be stronger than elsewhere. The area has a more coherent sense of community identity and interests and, as a whole, looks more to London than the rest of the county. In the context of the Government's proposals for the Thames Gateway, the area shows a common objective in seeking to carry through economic development to which, in the Commission's judgement, two strong all-purpose authorities could bring a sense of determination and clout.

110 **Option two** – seven unitary authorities for the whole of the county – was supported by the Kent Association of District Councils and by the majority (eight out of fourteen) of district councils. This structure, in the view of the district councils, 'struck the right balance between councils which can both reflect identities and interests and deliver services'. The proposal avoided changes to existing district boundaries, comprising two new authorities (Maidstone and Swale) on their present district council boundaries, and merging whole district areas in the rest of the county.

111 The Commission considered that this proposal broadly reflected particular interests across the county, such as those arising from the Thames Gateway, tourism (in the north-east), matters arising from port and coal mine closures (in east Kent), or maintaining rural areas in the face of development pressures (in west Kent). The district councils' submission pointed to the focal point for each proposed authority for shopping, employment and the provision of services. In service delivery terms, the authorities would be reasonably close to the indicative population range of 150,000

to 250,000 within which the Commission expects most unitary authorities to fall. The Commission acknowledged, however, that outside north-west Kent, the proposed authorities were not entirely natural communities and some would have competing centres which could reduce local focus. There was also no general coterminosity with service boundaries of other bodies, nor with existing County Council services. Some joint arrangements would also be required.

- 112 **Option three** – six unitary authorities – built upon the seven unitary option, but amended it in two ways. First, the district of Swale was divided, adding the western part to Rochester upon Medway (together with Gillingham) and the eastern part to Canterbury (together with Dover and Thanet). Second, it effected boundary changes by extending the southern boundary of Dartford to take in the nine northern parishes of Sevenoaks, and extending the western boundary of Maidstone to include twenty-four parishes of Tonbridge and Malling. This structure was not put forward jointly by the local authorities in Kent. It did, however, build upon different proposals put forward in both the district councils' joint submission and by some individual authorities. It had some advantages over option two in terms of coterminosity with some areas of service delivery and of reflecting community identities. Aspects of this proposal were strongly opposed by some individual authorities, notably those which would be split. The Commission therefore wished particularly to assess the views of residents and other local interests.
- 113 **Option four** involved no change to local government structure throughout the county.

SUPPORT FOR CHANGE

- 114 Residents in Kent clearly supported the principle of unitary local government according to a MORI survey undertaken during the initial stage of the review. As may be seen from appendix A, over half the residents surveyed (55 per cent) supported the principle while 26 per cent were opposed. Further, as already indicated, the Commission appears to have identified the realistic structural options for the county as a whole in its consultation report. However, there has been a distinct lack of enthusiasm for any option for change canvassed by the Commission.
- 115 Only 14 per cent of all respondents who wrote directly to the Commission preferred **option one**, the Commission's draft recommendation. The level of support in the areas for which unitary authorities were proposed – in north-west Kent – was, overall, no greater than the average for the county: it was supported by only 8 per cent of respondents in Dartford, 12 per cent in Gillingham and 5 per cent in Gravesham, although 23 per cent of respondents in Rochester upon Medway preferred the proposal. According to MORI, only 8 per cent of residents in Kent as a whole preferred the draft recommendation. In the affected four districts in the north-west, it was supported by 10 per cent of residents in Dartford, 16 per cent in Gillingham, 8 per cent in Gravesham and 15 per cent in Rochester upon Medway.
- 116 No local authority explicitly supported the proposal, although Gillingham and Rochester upon Medway supported the Medway Towns element. Nor did many other consultees. A number of concerns were expressed to the Commission during

the consultation period. Firstly, there was a fear that the proposal might involve hiving off part of Kent altogether. Respondents pointed to the history of Greater London expansion, in particular to the adjacent London Boroughs of Bexley and Bromley which were formerly in Kent and retain Kent post codes. The links identified by the Commission with the Thames Gateway initiative and the recognition in the consultation report of the river as a major feature linking these areas with the Thames, has threatened the local Kent identity of the area in a way which a Kent-wide unitary structure might not. Secondly, some expressed the view that this option could be unstable over time, leading to further reorganisation. Thirdly, concerns were expressed about severing the strategic planning link between north-west Kent and the rest of the county: the county and district councils agree that the preferred approach to planning would be for a joint Kent-wide structure plan for the whole of the existing county rather than (as the Commission proposed) unitary development plans prepared by each of the two new unitary authorities in the context of the Thames Gateway strategy. Fourthly, there was some concern over the costs of change, and particularly the costs imposed on the residents in the remainder of Kent, including the special problems of 'down-sizing' existing County Council overheads to reflect reduced volume of services. As indicated earlier, the Commission has now modified its financial appraisal of this option, partly to meet this point.

- 117 **Option two** – seven unitary authorities – retains the clear support of six of the fourteen district councils and of some Members of Parliament. Apart from specifically local interests, however, relatively few consultees have favoured the proposition. It also failed to gain widespread support from local people. Only 11 per cent of respondents who wrote to the Commission preferred this option, similar to the level of 'firm' support of residents suggested by MORI (10 per cent). Some respondents reinforced the Commission's concerns about the community identity of the proposed areas outside north-western Kent. One area where significantly above average support was achieved for the option was Swale, where a unitary authority was proposed on existing district council boundaries (and, perhaps more significantly, where the district would have been divided under the Commission's alternative county-wide unitary structure).
- 118 **Option three** – six unitary authorities – received very little support during the consultation period. Only one district council favoured it – Dartford, which would have been merged not only with Gillingham, but also with the northern parishes of Sevenoaks district, including Swanley. Only 5 per cent of respondents to the Commission preferred it, close to the level of 6 per cent support indicated by MORI. The highest expression of support among direct respondents to the Commission was from Dartford (15 per cent) while, according to MORI, the highest support was in Sevenoaks (14 per cent). Overall, however, respondents have not supported this structure.

SUPPORT FOR RETAINING THE PRESENT TWO-TIER STRUCTURE

- 119 The Commission found considerably more support for **option four**, the retention of the present two-tier structure throughout the county, than for any alternative structure. This can be seen from figure 7, which shows respondents' support for unitary structures

in their own district, compared with support for no change. In the four districts in north-west Kent, support for unitary structures has been calculated by adding together the support for options one, two and three while support for no change comprises only option four (and 'no need to change'); in the rest of the county, support for unitary structures comprises total support for options two and three, while support for no change comprises both options one and four (and 'no need to change').

Figure 7
SUPPORT FOR UNITARY STRUCTURES AND FOR NO CHANGE IN
RESPONDENTS' OWN DISTRICTS

Percentage of respondents and residents

Authority	Preference for unitary structures		Preference for no change	
	NOP	MORI	NOP	MORI
Kent average	19	20	78	55
Ashford	9	12	88	56
Canterbury	13	15	82	58
Dartford	28	30	72	49
Dover	14	13	82	58
Gillingham	22	31	75	43
Gravesham	11	14	86	70
Maidstone	14	20	83	53
Rochester upon Medway	37	29	60	47
Sevenoaks	26	26	71	59
Shepway	11	10	86	54
Swale	38	26	59	52
Thanet	17	19	71	50
Tonbridge & Malling	11	15	86	62
Tunbridge Wells	13	16	85	62

Source: NOP tabulations and MORI, September 1994

120 It can be seen from figure 7 that 78 per cent of respondents preferred no change to local government structure in their own district. The three districts with the largest level of public support for unitary structures are in north-west Kent – Dartford, Gillingham and Rochester upon Medway according to MORI. However, even in these districts, support for option four exceeds support for all the unitary options put together. In Gravesham, where the Borough Council prefers option four if a unitary authority on district boundaries is not possible, a much lower level of support was found for unitary structures, with a high level of support for no change.

121 As indicated earlier, many local organisations and interests have also advised the Commission of their preference for option four. It is supported, for example, by 64 per cent of businesses who contacted the Commission directly and 59 per cent of respondents to a Chamber of Commerce survey. Also, 64 per cent of town and parish

councils preferred no change, as did five of the principal authorities. A number of factors have been specifically identified by respondents in explaining their preference. First, there seems to be a clear sense of belonging to the 'County of Kent'. There was some unease, particularly in the north-west of the county, at the prospect of linkages outside the county.

122 Secondly, it has proved difficult to identify a unitary structure which can genuinely reflect community identities and interests. The Commission found that people's sense of belonging was generally at a very local level and although the present districts may have succeeded in many cases in developing a sense of belonging to the existing district area, residents were not generally in favour of a change to unitary councils for bigger areas. The Commission considered carefully the case for smaller unitary authorities but any advantages in terms of community identity and interests must be balanced against their ability to provide convenient and effective local government.

123 Thirdly, many respondents referred to issues which are particular to Kent, and which had been rehearsed in the Commission's consultation report, notably the importance of the strategic role played by the County Council in a two-tier structure. This is particularly relevant in the light of the county's location between London and mainland Europe, and the development pressures arising from growth in European trade, the Channel Tunnel and improved communications.

124 Finally, there seems to be general satisfaction with the present County Council and fourteen district councils. Local people could not see the need for any change, and were sceptical about the Commission's forecast of likely costs and savings, and the potential of a unitary structure to enhance the quality of local government in the county.

MODIFYING THE COMMISSION'S DRAFT RECOMMENDATIONS

125 Nevertheless, the strength of public support for the Commission's different consultation options appears to vary from district to district, and the Commission has therefore explored the possibility of a modified structure that might reflect this. There was, for example, a surprising variety of opinion on North West Kent and the Medway Towns.

126 *North West Kent.* In Dartford, the Borough Council reaffirmed its support for a unitary authority embracing Gravesham and the nine northern parishes of Sevenoaks, and its 'staunch opposition' to the retention of the two-tier structure, although this did not seem to appeal to its residents. But the Commission is fully aware, both from representations and a public meeting, of the level of opposition in the northern parishes, especially outside Swanley, to such a transfer, and it doubts whether a unitary Dartford on this basis would adequately reflect community interests and identities, or be in the interests of securing effective and convenient local government.

127 In Gravesham, the Borough Council has consistently expressed its misgivings about a link with Dartford. In its response to the Commission's consultation report, it comments: 'In the absence of a unitary option on its own boundaries, (it is) of the

firm view that there should be no change in Kent. This is supported by many local organisations and the strong identity found with both Kent and Gravesham in the Commission's MORI poll. The consultation report states that the two-tier structure appears to have fitted well at district level to the fabric of Kent. This is particularly true in Gravesham, where relationships between the urban and rural areas are harmonious'. The Borough Council points to the 'serious competition' between the two towns of Dartford and Gravesend and that this would be very difficult to resolve, as it reflects clear differences between the two areas. On the Commission's draft recommendation, it adds: 'Local opinion, from all parts of the political and other spectrums, is implacably opposed to the preferred option. There is a real fear locally that it would lead to North West Kent becoming part of London with consequent pressures on green belt and other factors. Letters to the local press have forcibly stated that local people do not wish to be separated from the rest of Kent.'

- 128 Gravesham Borough Council's strength of view has been matched by a lack of support from local residents. According both to representations made direct to the Commission, and to MORI's survey, residents' enthusiasm for any of the Commission's proposals for change is among the lowest of all districts. The level of residents' support for no change in their own district is, by a considerable margin, the highest in the county, according to MORI: 70 per cent compared with 62 per cent in the second highest districts of Tonbridge & Malling and Tunbridge Wells, with a county-wide average of 59 per cent.
- 129 The Commission would be unwilling to recommend a new North West Kent authority in the face of such strong opposition. It has considered whether, however, there would be scope for recommending a unitary authority for Dartford, without Gravesham, either on Dartford Borough Council's existing boundaries or extended to include the nine northern parishes of Sevenoaks. Dartford, on current boundaries, has a population of 82,000. If the nine northern parishes were to be included, the population would be 129,000 – some way below the indicative range included by the Commission in its report, *Renewing Local Government in the English Shires*, although the Commission has noted the potential in the area for significant development and increases in population in the future, in the context of the Thames Gateway initiative.
- 130 *Medway Towns*. Both Gillingham Borough Council and Rochester upon Medway City Council continued to support the proposal for a single unitary authority for the Medway Towns. In the light of the Commission's unwillingness to confirm its draft recommendation for a North West Kent authority (Dartford and Gravesham), the case was considered for a unitary authority for the Medway Towns alone. However, the omission of Dartford and Gravesham weakens the case made by the Commission in its consultation report, given the strength that two new unitary authorities *together* could bring to the area. This applies particularly to economic development and planning in the context of the Thames Gateway initiative. Further, while the level of support for the draft recommendation among residents in both Gillingham and Rochester upon Medway appears to have been the highest of all Kent districts according to MORI (and also, so far as Rochester upon Medway is concerned, among those who wrote to the Commission direct), this is exceeded by some margin by

support for option four (no change). The Commission recognises that there is a longstanding wish amongst many people in the Medway Towns for a reflection in local government structures of their common identity. Nonetheless, the majority of public opinion currently appears not to be in favour of a unitary structure along the lines, and within the context, proposed by the Commission.

SUMMARY

- 131 The Commission did not set out to conduct a referendum, and it is aware that public opinion in Kent may have been swayed by publicity campaigns and by some quite unsubstantiated assertions of the risks of change. But it is satisfied nonetheless that there is at present no overall support in the county for a change in local government structures. It is also satisfied from the huge volume of further evidence and arguments that it has received, from special interests as well as from the public at large, that the existing structure has the capacity to secure the strategic overview that the county as a whole requires, while reflecting the variety of different communities it comprises.
- 132 That is not to say that the Commission believes that all is well with local government in the county, and it would be a tragedy, in the Commission's view, if its final recommendations to the Secretary of State were to be interpreted locally simply as a reprieve for the County Council and a defeat for the unitary designs of the districts, rather than as an opportunity to work more closely together in the future to improve the quality of local government. The Commission has been informed of some important steps that have already been taken to extend the partnership approach between the two tiers, and to review the extent to which the operational components of county-level functions might be transferred to the districts within the context of agreed county-wide strategic schemes. The allocation of functions in the two-tier system is not totally inflexible, and there is scope for some local reallocation of functions where appropriate. These are at present being explored. Some specific steps have already been taken jointly by the county and some district councils to establish one-stop shops, to examine the possibilities for staff training to facilitate joint work, and to establish 'community forums' to develop a common approach to problems of deprivation. The Commission commends these and other similar examples of joint working that are now emerging.

5 FINAL RECOMMENDATIONS

- 133 The final recommendations below reflect the Commission's consideration of all the evidence the Commission has received, including the responses to its consultation report, *The Future Local Government of Kent*. The first section addresses the structure of local government in Kent; the second relates to the other matters on which the Commission consulted.

THE STRUCTURE

- 134 The Commission considered the reaction of all parties to the draft recommendation and alternative options consulted upon during stage three of the review. The overall weight of local opinion was heavily supportive of the current two-tier structure. The Commission concluded, on the balance of all the evidence, that this structure best meets the statutory criteria, having regard to the Government guidance.

FINAL RECOMMENDATION 1

There should be no change to the existing local government structure in Kent.

OTHER MATTERS

- 135 In view of the recommendation that there should be no change to the existing local government structure in the county, the Commission is not making any recommendations regarding particular services.

LOCAL COUNCILS

- 136 As part of the Commission's MORI survey, residents were asked whether they supported the creation of parish and town councils, if local people want them, where they do not currently exist. There was a strong level of support (76 per cent) for this proposal, with only 13 per cent in opposition.
- 137 The Commission's consultation report proposed the creation of parishes in the areas of Herne and Broomfield, Deal, Dover, Folkestone, Great Mongeham, Margate, Ramsgate and Walmer. The Commission has received significant support for the creation of parishes in all these areas except for Margate and Ramsgate where expressions of support have been very small in number. As the Commission set out in its consultation report, there is a need for special justification for emparishment for those areas which exceed the indicative population limits outlined in Circular

121/77. It is perhaps understandable that given the nature of the Commission's consultation process, the issue of parishing may have been given a lower priority by residents in these areas.

138 The expressions of support received by the Commission include:-

- | | |
|----------------------|---|
| Folkestone | — Two petitions containing around 2000 signatures supporting the creation of a parish.
— Formal support of Shepway District Council. |
| Herne and Broomfield | — Results of a leaflet survey showing more than 85% support from around 1300 signatories. |
| Dover | — Results of a consultation exercise conducted by the Charter Trustees.
— Formal support of Dover District Council. |
| Great Mongeham | — A petition submitted by the Parish Council Steering Committee showing support for parishing. |
| Deal | — Around 800 names of supporters of parishing collected by Friends of North Deal. |
| Walmer | — Results of a questionnaire survey conducted by Dover District Council. The survey also covered the areas of Great Mongeham and Deal. |

FINAL RECOMMENDATION 2

That parishes should be created in the areas of Deal, Dover, Folkestone, Great Mongeham, Herne and Broomfield, and Walmer.

139 The details of the Commission's final recommendations, including maps where appropriate, are given in appendix C.

140 As indicated in paragraph 45, the Commission has no power to make recommendations in relation to the electoral arrangements for any new parish councils which may be established as a consequence of its final recommendation. Nevertheless, the Commission's consultation report provided details of the electoral arrangements suggested to it by respondents. The Commission's conclusions may be of assistance to the Secretary of State and to the appropriate district councils in the review area. The Commission is also of the view that any parish council elections for these areas should be held on the same cycle as elections to the principal authorities.

141 In its consultation report, the Commission invited views on whether parishes should be created for any other unparished areas of the county, and undertook to reflect the response in its final report. Proposals have been made for the parishing of Strood - comprising the area west of the Medway river including the parishes of Wainscott and

Frindsbury, Walderslade/Lordswood, Reculver and Beltinge. The Commission received no further representations in respect of these proposals with the notable exception of Reculver and Beltinge, from which the Commission received, inter alia, a petition containing 271 names in opposition to the creation of a parish.

142 The Commission is concerned that the historic traditions of Margate and Ramsgate as Cinque Ports should be recognised irrespective of the Commission's decision not to pursue parishing at this time. In view of the level of support for parishing generally, as evidenced by the MORI survey, and in the light of representations, the Secretary of State may wish to direct the Commission to undertake a review of the parishing arrangements at some future date.

143 In *Renewing Local Government in the English Shires*, the Commission argues for an enhanced role for parish and town councils within the existing statutory provisions. It is quite clear, from the MORI survey and other evidence, that there already exists in Kent a strong sense of identity with local neighbourhoods and with parish and town councils, and therefore a strong base on which to build. Therefore, the Commission recommends that the role of parish and town councils should be enhanced, whatever the structure of principal authorities.

144 To enhance the role of parish and town councils, the Commission believes that there should be regular meetings with the principal local authorities, improved consultation on planning and highways issues and - where there is a demand from a local council-devolved management of local facilities such as sports grounds and libraries. Members of parish and town councils would also be well placed to help residents secure assistance or redress when faced with problems regarding local services. These proposals enlarge on existing practice and reflect suggestions in many of the submissions to the Commission, both nationally and locally.

145 Neither the Government nor the Commission envisages an increase in the statutory powers of parish and town councils, nor the establishment of another tier of local government, and few respondents have argued for this. However, the Commission does see an important role for parish and town councils in empowering local communities. The Commission agrees with many of its respondents that a clear consultative framework should be established between local authorities and parish and town councils. This framework, or 'local charter', could ensure that parish and town councils have rights to the following:

- (i) a clear statement of the matters affecting the local community upon which they will be consulted, with the areas for consultation being widely drawn;
- (ii) sufficient information from principal authorities about local matters on which local councils' views have been requested;
- (iii) the right to a written explanation from a principal authority if it decides, as it legitimately may, not to agree with the views of the parish or town council;
- (iv) regular meetings between representatives of the principal authority and the parish and town councils to discuss matters of common interest.

FINAL RECOMMENDATION 3

- (i) There should be an enhanced consultative role for all parish and town councils.
- (ii) Elections for parish and town councils should, whenever possible, be held at the same time as elections for principal authorities.

* * *

NEXT STEPS

- 146 Having completed its review of Kent and submitted its final recommendations to the Secretary of State, the Commission has fulfilled its statutory role under section 13 of the Local Government Act 1992.
- 147 It now falls to the Secretary of State, if he thinks fit, to give effect to the Commission's recommendations with or without modification, and to implement them by means of an Order which will be laid before both Houses of Parliament. Such an Order will not be made earlier than a period of six weeks from the date the Commission's recommendations are submitted to the Secretary of State.
- 148 All further representations and correspondence concerning the matters discussed in this report should be addressed to the Secretary of State, who will take them into account before reaching a conclusion on the Commission's recommendations. Representations should be addressed to:

The Secretary of State for the Environment
Local Government 1 Division
Department of the Environment
2 Marsham Street
London SW1P 3EB

APPENDIX A

SUMMARY OF MORI FINDINGS ON COMMUNITY IDENTITY

Extract from the Commission's consultation report

RESIDENTS' ATTITUDES TO CHANGE

- 1 Local attitudes to change are important. It has generally been the Commission's experience that residents favour a unitary system of local government, although there are some review areas where support for this principle has proved to be weak. When residents are given choices for unitary structures it can be difficult to translate support for the unitary principle into designs for the actual unitary structures.
- 2 As part of the market research on community identity in Kent, the Commission sought the views of local residents on unitary authorities. Over half of residents surveyed (55 per cent) supported the principle for one council to provide services in the area rather than two. Only one in four (26 per cent) expressed opposition: one in five did not have an opinion either way (19 per cent). In all districts, support outweighed opposition though to varying degrees. The level of support was highest in Thanet (70 per cent) and Swale (66 per cent) and lowest in Rochester upon Medway (38 per cent). Those who had already heard of the review were both more likely to support the principle (59 per cent) or oppose it (29 per cent), than those who had not (50 per cent support, 23 per cent oppose).

THE IDENTITIES AND INTERESTS OF LOCAL COMMUNITIES

- 3 The Commission considered it helpful to establish baseline information on the priorities people attach to the various factors that will influence local government structure and the MORI survey commissioned jointly by the Oxfordshire authorities also addressed this issue.
- 4 This survey enabled the Commission to gauge the relative importance the public gives to major factors that will influence local government structure. Responses to the question 'which *three* of these factors, if any, do you think should be most important in deciding the local government structure in your area?' Responses to the question are shown in figure A1. The survey reveals that quality of services and responsiveness to local people scores most highly in people's concerns; conversely historic or traditional boundaries are of less concern.
- 5 When asked what was the *single* most important factor, 28 per cent of the residents identified quality of services; 27 per cent responding to local people's wishes; 14 per cent accountability and 12 per cent the cost of services. No other factor was identified by more than 3 per cent of respondents. In a separate MORI survey, also on a national basis, 82 per cent of residents said they would not be prepared to pay extra for services to be locally based.

Figure A1

FACTORS DETERMINING LOCAL GOVERNMENT STRUCTURE KENT

Percentage of respondents mentioning each factor

Quality of services	64
Responding to local people's wishes	58
Cost of services	44
Accountability	36
Ease of contacting the council	20
Sense of local community	18
Access to local councillors	18
Level of information about the council and its services	16
Size of population covered	10
Historical or traditional boundaries	6
Don't know/no opinion	4

Source: MORI, January 1994

- 6 The MORI survey in Kent showed that 47 per cent of people in the county had never heard of the review of local government structure. When asked how much they knew about the issues, only 13 per cent claimed they knew a 'great deal' or a 'fair amount'. This could suggest that some of the evidence received in the early stages of the review may have been from people and organisations with a special interest in, or knowledge of, the review.

COMMUNITY IDENTITY

- 7 MORI also asked people living in Kent about where they felt they belonged. Figures A2 and A3 summarise the key findings. Figure A2 shows that, throughout Kent, community affiliation is generally strongest in respect of the local neighbourhood or village, followed by the home town or nearest town. As the Commission found also in most other counties, the sense of belonging to the local government area of the county council, or of the district council, was less pronounced.

Figure A2

COMMUNITY IDENTITY IN KENT: AN OVERVIEW

Question: 'How strongly do you feel you belong to each of the following areas?'

Percentage of respondents

Authority	Very Strongly	Very/Fairly Strongly
This neighbourhood/village	34	76
Town/nearest town	24	65
District/borough area	14	51
County council area	16	52

Source: MORI, January 1994

- 8 Nevertheless, as figure A3 illustrates, there were some significant variations across the county. Identification with district council areas peaks in Thanet (80 per cent identify 'very' or 'fairly strongly'); next highest is in Gravesham (58 per cent). In Ashford, strong affinity runs at just 37 per cent, while it is also below average in Sevenoaks (38 per cent), Dover (41 per cent) and Tonbridge & Malling (42 per cent). Overall, 51 per cent of those surveyed said they identified strongly with their district area, against a national average of 55 per cent.
- 9 The county council area attracts 'very' or 'fairly strong' identification from as many as 65 per cent in Gravesham and 67 per cent in Thanet. Around two in five identify strongly with the county area in Canterbury (41 per cent), Dover (42 per cent), Rochester upon Medway (40 per cent), Sevenoaks (44 per cent) and Tunbridge Wells (44 per cent). Overall, 52 per cent of those surveyed identified strongly with the county of Kent. This is broadly in line with the national figures.

Figure A3

COMMUNITY IDENTITY IN KENT

Question: 'How strongly do you feel you belong to each of the following areas?'

Percentage of respondents indicating belonging 'very or fairly strongly'

Authority	Neighbour- hood/village	Town/ nearest town	District Council Area	County Council area
Ashford Borough Council	74	55	37	56
Canterbury City Council	74	73	49	41
Dartford Borough Council	76	69	54	58
Dover District Council	78	69	41	42
Gillingham Borough Council	75	56	51	53
Gravesham Borough Council	79	60	58	65
Maidstone Borough Council	77	67	56	60
Rochester upon Medway City Council	59	62	46	40
Sevenoaks District Council	78	53	38	44
Shepway District Council	83	68	47	48
Swale Borough Council	74	71	56	54
Thanet District Council	88	74	80	67
Tonbridge & Malling Borough Council	69	50	42	56
Tunbridge Wells Borough Council	80	72	55	44

Source: MORI, January 1994

APPENDIX B

Local Government Structure in Kent

RESEARCH STUDY CONDUCTED FOR
THE LOCAL GOVERNMENT COMMISSION FOR ENGLAND
SEPTEMBER 1994

MEMORANDUM

TO: The Local Government Commission for England
 FROM: MORI Local Government Research Unit
 DATE: September 1994
 RE: Public attitudes to Local Government structure in Kent

TECHNICAL NOTE

MORI interviewed a representative quota sample of 4,376 adults aged 18+ across Kent. All Census enumeration districts (EDs) in the county were sorted into districts and within district, ranked by percentage professional/managerial households. At this stage, 24 EDs were selected in each district, with a probability of selection proportional to the size of the population of each. Quota controls were set for each sampling point, by gender, age and work status using 1991 Census data. Around 300 interviews were achieved in each district, and at the analysis stage the data were weighted to account for the population profiles of each district and the relative population sizes.

MAIN FINDINGS

- The majority preference is for the 'no change' option of the commission across the county, which is the most commonly selected option within every district.
- Between one in ten and one in twenty has a firm preference for each of the other three options.
- No majority agreement on which option would be worst – either across the county or within any district.

DETAILS

- Three in four (74%) name Kent as their County Council
- Between seven and nine in ten name their District Council (lower in Rochester upon Medway)

Q What is the name of the Borough/District/City Council for this area?

	%
Ashford Borough	92
Canterbury City	83
Dartford Borough	86
Dover District	87
Gillingham Borough	81
Gravesham Borough	91
Maidstone Borough	87
Rochester upon Medway City	62
Sevenoaks District	91
Shepway District	74
Swale Borough	84
Thanet District	80
Tonbridge & Malling Borough	78
Tunbridge Wells Borough	81

- Just quarter (26%) say they have never heard of the Review. Depth of knowledge of the Review remains low as in other counties – just two per cent of residents say they know “a great deal” about the Review, and eleven per cent know “a fair amount”.
- The options for change were presented as on the Commission leaflet, modified to remove the text indicating the Commission’s recommendation.

In summary the options were:

One: North West Kent and Medway would become unitary councils with the retention of the existing two-tier structure in the remainder of the county.

Two: Seven new unitary councils.

Three: Six new unitary councils.

Four: No change

- County-wide, there is majority support for Option Four. This is the most popular option in all districts.

Q Please tell me which of these options, if any, you would prefer?

		Option One	Option Two	Option Three	Option Four	None of these	Don't know
KENT	%	9	11	7	51	3	19
Ashford	%	9	7	5	48	3	28
Canterbury	%	5	10	9	59	3	14
Dartford	%	11	12	11	50	3	13
Dover	%	13	10	6	45	3	23
Gillingham	%	16	10	5	42	3	24
Gravesham	%	9	4	3	70	2	12
Maidstone	%	10	15	7	45	4	19
Rochester upon Medway	%	17	10	5	47	1	20
Sevenoaks	%	6	13	17	55	1	8
Shepway	%	7	7	6	53	4	23
Swale	%	5	20	6	46	5	18
Thanet	%	9	16	5	49	2	19
Tonbridge & Malling	%	5	11	6	56	3	19
Tunbridge Wells	%	10	9	9	52	2	18

- Offered the opportunity to name “other” options that they preferred (but with no particular options prompted), over four in five say either that there are none (62%) or that they do not know (21%). The proportions stating that they prefer another option are as follows:

Q What other options, if any, would you prefer to those I have shown you?

		No need to change	Some other preference
KENT	%	10	7
Ashford	%	9	3
Canterbury	%	15	14
Dartford	%	6	8
Dover	%	13	8
Gillingham	%	4	2
Gravesham	%	11	4
Maidstone	%	9	7
Rochester upon Medway	%	7	6
Sevenoaks	%	10	7
Shepway	%	10	13
Swale	%	9	4
Thanet	%	7	16
Tonbridge & Malling	%	13	6
Tunbridge Wells	%	8	5

Some respondents who have selected Option Four as their most preferred option are then saying that they would prefer "No change".

- All respondents are, therefore, asked two questions about their preferences: first, they are asked to select one of the Commission's options; second, they are asked if there are any other options that they would prefer.

By taking account of people's responses to both questions we can prepare a succinct summary which best reflects people's views and preferences.

The methodology is as follows: those who select one of the Commission's options as their first preference with the prompted list, and then went on to say that they do not have any other preference when offered an open choice, are described as "firm" supporters of that option.

Those who, having given their preference for one of the Commission's options, then went on to say there was actually another structure that they would prefer (which might have been the status quo, for example) are re-allocated to take account of this information.

There are also those who express no view or preference at both the Commission's options question and the unprompted open choice question. These people remain categorised as "Don't know". The table below sets out the results of this analysis across the County and within individual districts.

Firm Support

		Option One	Option Two	Option Three	Option Four	No need To change	Other	Don't know
KENT	%	8	10	6	41	10	7	18
Ashford	%	8	7	5	39	9	3	29
Canterbury	%	4	7	8	39	15	14	13
Dartford	%	10	11	9	43	6	8	13
Dover	%	10	8	5	35	13	8	21
Gillingham	%	16	10	5	39	4	2	24
Gravesham	%	8	3	3	59	11	4	12
Maidstone	%	8	14	6	36	9	7	20
Rochester upon Medway	%	15	9	5	40	7	6	18
Sevenoaks	%	5	12	14	44	10	7	8
Shepway	%	7	5	5	37	10	13	23
Swale	%	4	20	6	39	9	4	18
Thanet	%	7	14	5	36	7	16	15
Tonbridge & Malling	%	5	9	6	44	13	6	17
Tunbridge Wells	%	9	7	9	45	8	5	17

- Within each district, it is feasible to add figures horizontally where the outcome of more than one option is the same for the district concerned. For example, Options One and Two entail a unitary North West Kent; therefore, the figures for first preference of these options can be added together for Dartford and Gravesham residents. However, such combinations should always be treated with caution, as it may be that respondents' preferences are at least partly based on what would happen **outside** of the district in which they live.
- Although there is no majority opinion, the six unitary authorities option is most commonly selected as the least preferred option.

Q Which, if any, of the options shown here would you least prefer?

		Option One	Option Two	Option Three	Option Four	None of these	Don't know
KENT	%	18	13	23	7	9	30
Ashford	%	15	10	18	5	4	48
Canterbury	%	24	13	21	7	12	23
Dartford	%	27	13	21	7	7	25
Dover	%	17	12	24	9	5	33
Gillingham	%	16	9	17	9	10	39
Gravesham	%	17	10	29	2	15	27
Maidstone	%	15	21	22	7	5	30
Rochester upon Medway	%	13	11	28	8	11	29
Sevenoaks	%	24	16	32	8	5	15
Shepway	%	11	8	14	6	17	44
Swale	%	18	6	33	9	10	24
Thanet	%	18	11	23	8	10	30
Tonbridge & Malling	%	19	18	18	4	11	30
Tunbridge Wells	%	19	19	15	6	11	30

- Three-quarters support the principle of setting up town or parish councils where people want them (76%). This is broadly consistent throughout the County.

STATISTICAL RELIABILITY

The respondents to the questionnaire are only samples of the total "population", so we cannot be certain that the figures obtained are exactly those we would have if everybody had been interviewed (the "true" values). We can, however, predict the variation between the sample results and the "true" values from a knowledge of the size of the samples on which the results are based and the number of times that a particular answer is given. The confidence with which we can make this prediction is usually chosen to be 95% – that is, the chances are 95 in 100 that the "true" value will fall within a specified range. The table below illustrates the predicted ranges for different sample sizes and percentage results at the "95% confidence interval":

Size of sample on which survey result is based	Approximate sampling tolerances applicable to percentages at or near these levels		
	10% or 90%	30% or 70%	50%
	±	±	±
100 interviews	6	9	10
300 interviews	3	5	6
1000 interviews	2	3	3
3,000 interviews	1	2	2
4,000 interviews	1	1	2

For example, with a sample size of 300 where 30% give a particular answer, the chances are 19 in 20 that the "true" value (which would have been obtained if the whole population had been interviewed) will fall within the range of ± 5 percentage points from the sample result.

When results are compared between separate groups within a sample, different results may be obtained. The difference may be "real," or it may occur by chance (because not everyone in the population has been interviewed). To test if the difference is a real one – ie if it is "statistically significant", we again have to know the size of the samples, the percentage giving a certain answer and the degree of confidence chosen. If we assume "95% confidence interval", the differences between the two sample results must be greater than the values given in the table below:

Size of samples compared	Differences required for significance at or near these percentage levels		
	10% or 90%	30% or 70%	50%
	±	±	±
300 and 300	5	7	8
1,000 and 1,000	3	4	4
4,000 and 300	4	5	6
4,000 and 4,000	2	3	3

MARKED-UP QUESTIONNAIRE

FIELDWORK: 14 JULY - 15 AUGUST 1994

N = 4,376 RESPONDENTS AGED 18+

SAMPLE STRATIFIED BY DISTRICT

DATA WEIGHTED TO BE REPRESENTATIVE OF POPULATION PROFILE

Gender	%	Number in Household
Male	48	Adults aged 18+ (inc. respondent)
Female	52	16% 61% 15% 6% 1%
		1 2 3 4 5+
Age	%	Children (17 or under)
18-24	13	62% 14% 15% 5% 2%
25-34	19	0 1 2 3 4+
35-44	16	
45-54	18	
55-64	13	
65-74	14	
75+	8	
QA Are you or other members of your household employed by a council? IF YES: Is this a Borough/District/City Council or a County Council? CODE FOR BOTH RESPONDENT AND OTHER HOUSEHOLD MEMBERS		
		Respondent Other
		% %
Yes:		
Borough/District/City	2	2
County	5	3
Don't know which ...	*	*
No	93	86
Don't know	1	8
Work Status	%	
Full-time (30 hrs/wk+)	46	
Part-time (8-29 hrs/wk)	9	
Not working (under 8 hrs)	4	
Looking after home/children	10	
Retired	23	
Registered unemployed	3	
Unemployed but not registered	1	
Student	2	
Other	1	
Occupation of Chief Income Earner (CIE)		Tenure
Position/rank/grade		%
		Owned outright
		29
		Buying on mortgage
		46
Industry/type of company		Rented from Council
		9
Qualifications/degrees/apprenticeship		Rented from Housing Association
		5
		Rented from private landlord
		7
		Other
		2
No of Staff Responsible for		QB Is this your main permanent home, or is it a second or holiday home?
		%
PROBE FOR CIE/PENSION		Main/permanent
		99
		Second/holiday
		*
AB	18	Car in Household
C1	27	CIRCLE NUMBER
C2	26	19% 49% 25% 7%
D	16	0 1 2 3+
E	14	

THIS FORM IS THE PROPERTY OF
MARKET & OPINION RESEARCH INTERNATIONAL (MORI)
32 OLD QUEEN STREET, LONDON, SW1H 9HP

INTERVIEWER DECLARATION: I confirm that I have conducted this interview face-to-face with the above named person and that I have asked all the relevant questions fully and recorded the answers in conformance with the survey specification and the MRS Code of Conduct.

Interviewer Name Signature

Interviewer Number /

Month Date
DATE OF INTERVIEW

NB INTERVIEWER: ALL SHOWCARDS HAVE BEEN REVERSED. PLEASE BE CAREFUL TO CODE THE CORRECT RESPONSE.

Good morning/afternoon/evening. I'm from MORI, the market research and polling organisation. We are doing a survey about local issues, and I would like to ask you a few questions.

ASK ALL

Q1a Firstly, how long have you lived in this town/village?

Q1b And how long have you lived in this county?

	Q1a %	Q1b %
Less than 1 year	6	2
1-2 years	6	2
3-5 years	10	3
6-10 years	16	8
11-20 years	19	15
Over 20 years/all my life	42	70
Don't know/can't remember	*	1

Q2 What is the name of the County Council for this area? DO NOT PROMPT

	%
Kent County Council	74
Other (WRITE IN & CODE "2")	10
Don't know	16

Q3 What is the name of the Borough/District/City Council for this area? DO NOT PROMPT

	Correct %
Ashford Borough Council	92
Canterbury City Council	83
Dartford Borough Council	86
Dover District Council	87
Gillingham Borough Council	81
Gravesend Borough Council	91
Maidstone Borough Council	87
Rochester upon Medway City Council	62
Sevenoaks District Council	91
Shepway District Council	74
Swale Borough Council	84
Thanet District Council	80
Tonbridge and Malling Borough Council	78
Tunbridge Wells Borough Council	81
Other (WRITE IN & CODE "3")	
Don't know	

IF INCORRECT ANSWER AT Q2 OR Q3, READ OUT: In fact, this is the Kent County Council area and the ... Borough/District/City Council area.

ASK ALL

Q4 SHOWCARD A (R) As you may know, there is currently a review being undertaken by the Local Government Commission on the future of local government structure in this area. How much, if anything, would you say you know about this?

	%
A great deal	2
A fair amount.....	11
Just a little	39
Heard of but know nothing about.....	22
Never heard of	26

HAND OVER COMMISSION LEAFLET

Four options have been put forward by the Local Government Commission for the future structure of local government in Kent. Could you please read through this leaflet, which outlines the options and includes maps which illustrate them.

ASK ALL

Q5 SHOWCARD (B) Please tell me which of these options, if any, you would most prefer?
SINGLE CODE ONLY

	%
Option 1	9
Option 2	11
Option 3	7
Option 4	51
None of these.....	3
Don't know	18

ASK IF PREFER 1,2 OR 3. (OTHERS GO TO Q7)

Q6 Why do you say you would most prefer option ... ?
PROBE FULLY - DO NOT PROMPT. MULTICODE OK
Base: All expressing preference (3,461)

	%
Cost/Efficiency	
Will cost less/save money.....	16
More efficient/less duplication.....	5
Easier to manage	7
Size/Area	
Smaller areas better/others too big.....	15
Bigger areas better/others too small/too many councils.....	4
More sensitive to local area/people	13
Each area different/local identity	6
Want to join/be part of ... (area/town)	3
Don't want to join/be part of (area/town)	4
Takes account of different levels of community.....	3
Maintains strategic services	2
General	
No need to change/OK as it is	47
Like present Council/is good/satisfactory.....	16
Don't like present Council/is poor	1
Current services good/current councils provide good services	6
Would increase services/more services.....	2
Would improve services/services would be good quality	2
Need strong/influential council	1
Go back to how it was	*
Good idea generally	2
Other (WRITE IN & CODE "9")	22
Don't know	3

ASK ALL

Q7 SHOWCARD B (R) AGAIN Which, if any, of the options shown here would be your second preference? SINGLE CODE ONLY

	Second %
Option 1	18
Option 2	15
Option 3	12
Option 4	8
None of these.....	18
Don't know	30

ASK ALL

Q8 SHOWCARD B (R) AGAIN Which, if any, of the options shown here would you least prefer? SINGLE CODE ONLY

	Least %
Option 1	18
Option 2	13
Option 3	23
Option 4	7
None of these.....	9
Don't know	30

ASK IF LEAST PREFER OPTION 1, 2 OR 3 (OTHERS GO TO Q10)

Q9 And why do you say you would least prefer option ... ?
PROBE FULLY - DO NOT PROMPT. MULTICODE OK
Base: All expressing least preference (2,613)

	%
Cost/Efficiency	
Cost of change.....	13
Would cost more to run/more expensive.....	9
Too much duplication.....	4
Too many joint arrangements.....	3
Too difficult to manage	9
Size/Area	
Area too big/smaller areas better.....	32
Area too small/bigger areas better/too many councils.....	9
Would ignore us/our views/would be isolated	6
Too impersonal/less local	12
Don't want to join/be part of ... (area/town).....	9
No local identity.....	7
Authorities too small to cope.....	2
Too narrow/no strategic view	1
General	
No need to change/OK as it is	9
Like/Don't like present Council/is good/poor.....	3
Poor services	2
Current services would be reduced/in danger	2
Bad idea generally	4
I prefer the others/like other options more.....	4
Other (WRITE IN & CODE "7")	21
Don't know	5

ASK ALL

Q10 What other options, if any, would you prefer to those I have shown you?

None	%
Don't know	62
Go back to how it used to be/back to pre-1974 structure	21
No need to change/keep things as they are	2
Other (WRITE IN & CODE "5")	10
	5

ASK IF CODE "3", "4" OR "5" AT Q10 (OTHERS GO TO Q12)

Q11 Why do you say that?

PROBE FULLY – DO NOT PROMPT. MULTICODE OK

Base: All citing another preference (740)

	%
Cost/Efficiency	
Will cost less/save money	10
More efficient/less duplication	5
Easier to manage	7
Size/Area	
Smaller areas better/others too big	13
Bigger areas better/others too small/too many councils	1
More sensitive to local area/people	16
Each area different/local identity	7
Want to join/be part of . . . (area/town)	2
Don't want to join/be part of . . . (area/town)	3
Takes account of different levels of community	2
Maintains strategic services	1
General	
No need to change/OK as it is	40
Like present Council/is good/satisfactory	9
Don't like present Council/is poor	3
Current services good/current councils provide good services	3
Would increase services/more services	2
Would improve services/services would be good quality	3
Need strong/influential council	1
Go back to how it was	4
Good idea generally	2
Other (WRITE IN & CODE "9")	19
Don't know	12

ASK ALL

Q12 Please tell me whether you support or oppose the following proposal . . .

READ OUT

	Support %	Oppose %	Neither/ Don't know %
If local people want them, town and parish Councils should be set up, where they do not exist	76	13	11

THANK RESPONDENT

GO TO DEMOGRAPHICS, THEN COMPLETE THE FOLLOWING:

District Name:

COPY SAMPLE POINT FROM FRONT PAGE

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APPENDIX C

RECOMMENDED PARISHING ARRANGEMENTS

FOLKESTONE

The Commission recommends that a parish be established for the unparished area of Folkestone, corresponding to the existing district electoral wards. This would facilitate the formation of a town council for Folkestone.

Figure C1

PROPOSED ELECTORAL ARRANGEMENTS IN A PARISH FOR FOLKESTONE

Electoral Ward	Electorate	Councillors
Folkestone East	3,068	3
Folkestone Harbour	3,435	3
Folkestone Central	2,586	3
Folkestone Harvey	3,668	3
Folkestone Sandgate	3,358	3
Folkestone Park	4,545	3
Folkestone Ford	3,316	3
Folkestone Cheriton	4,100	3
Folkestone Morehall	3,536	3
TOTAL	31,612	27

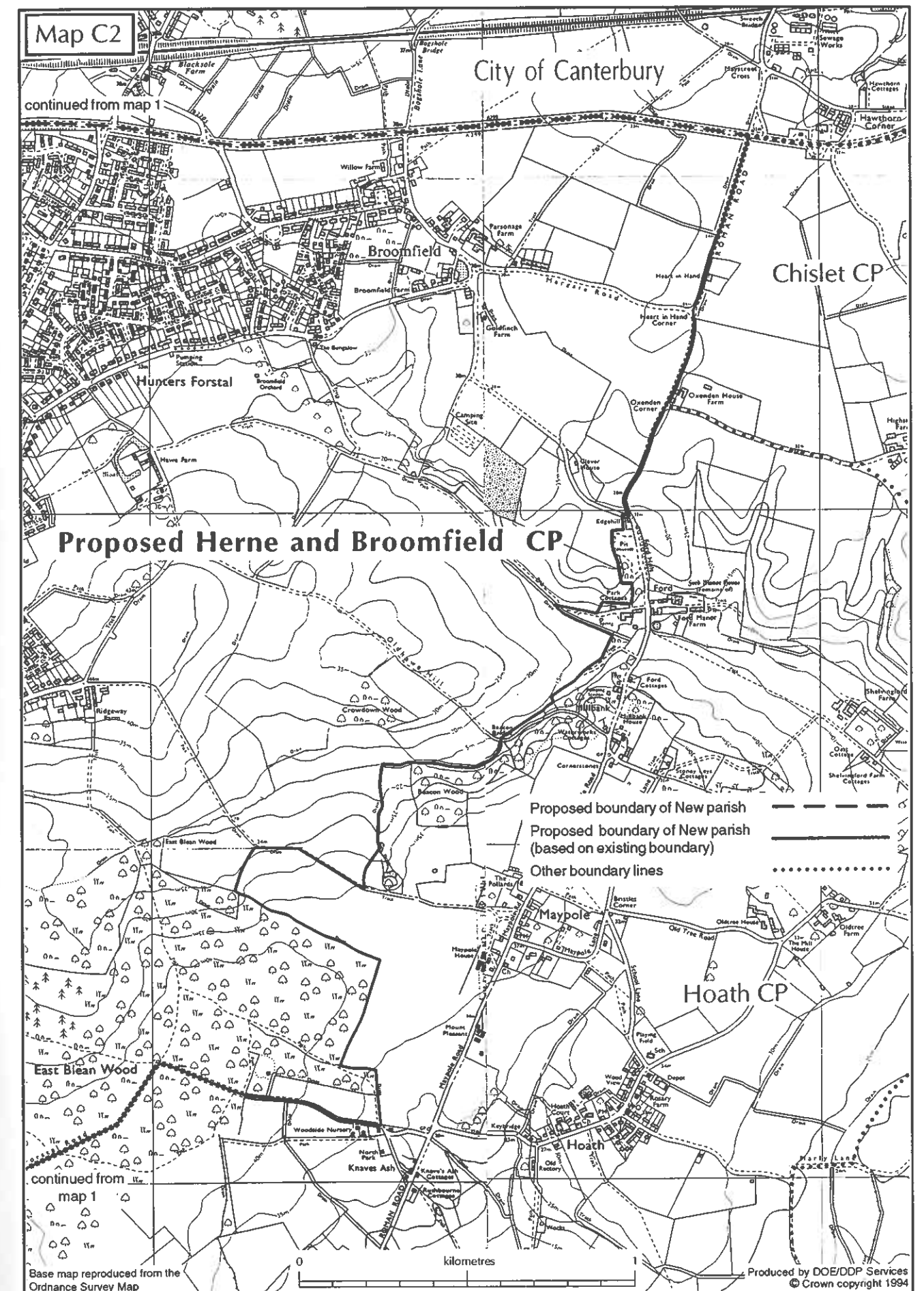
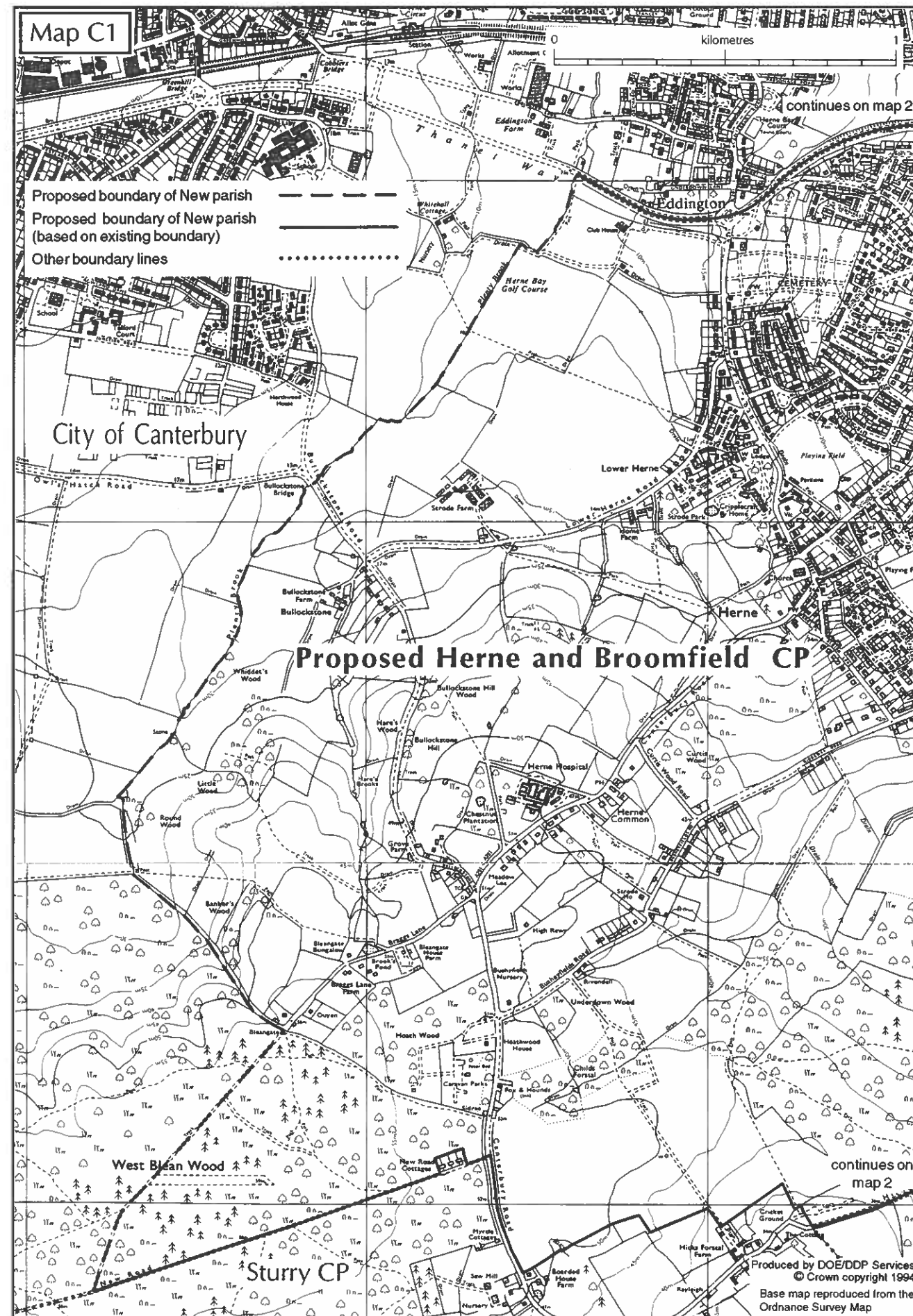
HERNE AND BROOMFIELD

The Commission recommends that a parish be established for the unparished area of Herne and Broomfield, corresponding in part to the district electoral ward and otherwise shown on maps C1 and C2.

Figure C2

PROPOSED ELECTORAL ARRANGEMENTS IN A PARISH FOR HERNE AND BROOMFIELD

Electoral Ward	Electorate	Councillors
Herne (part)	5,146	13
TOTAL	5,146	13



DOVER

The Commission recommends that a parish be established for the unparished area of Dover, corresponding to the existing district electoral wards. This would facilitate the formation of a town council for Dover.

Figure C3
PROPOSED ELECTORAL ARRANGEMENTS IN A PARISH FOR DOVER

Electoral Ward	Electorate	Councillors
Barton	3,251	2
Buckland	3,394	2
Castle	2,425	2
Maxton and Elms Vale	2,792	2
Priory	2,610	2
St Radigunds	2,379	2
Tower Hamlets	2,934	2
Town and Pier	1,645	2
TOTAL	21,430	16

GREAT MONGEHAM

The Commission recommends that a parish be established for the unparished area of Great Mongeham, corresponding in part to the existing district electoral ward and otherwise shown on map C3 and map C6.

Figure C4
PROPOSED ELECTORAL ARRANGEMENTS IN A PARISH FOR GREAT MONGEHAM

Electoral Ward	Electorate	Councillors
Mongeham	534	5
TOTAL	534	5

DEAL

The Commission recommends that a parish be established for the unparished area of Deal corresponding to the existing district wards and otherwise shown on maps C4, C5 and C6. This would facilitate the formation of a town council for Deal.

Figure C5
PROPOSED PARISHING ARRANGEMENTS IN A PARISH FOR DEAL

Electoral Ward	Electorate	Councillors
North Deal	4,949	4
Middle Deal	5,006	4
Mill Hill	2,916	4
Mongeham (part)	2,530	4
TOTAL	15,401	16

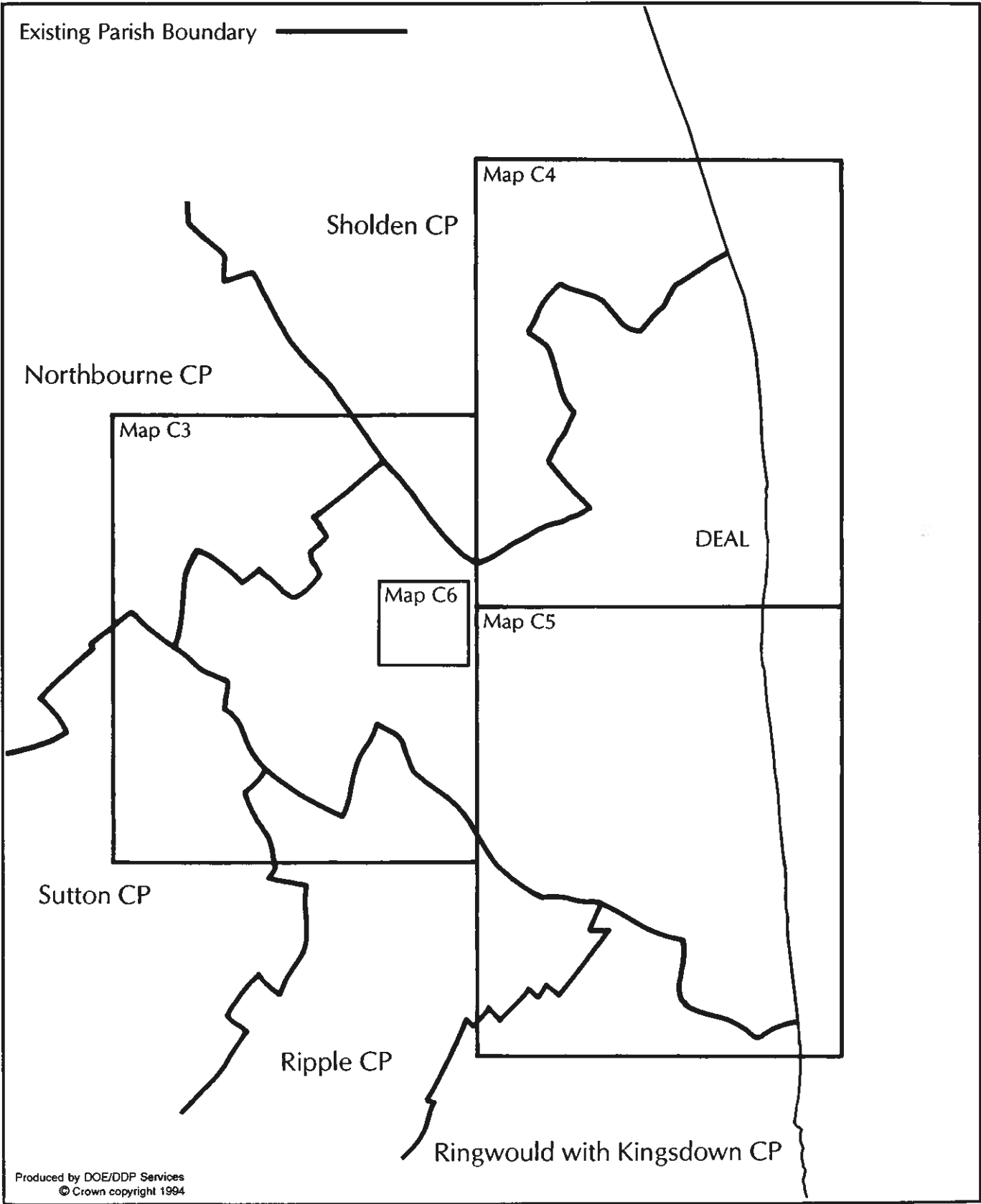
WALMER

The Commission recommends that a parish be established for the unparished area of Walmer, corresponding to the existing district electoral wards, and shown on maps C4 and C5.

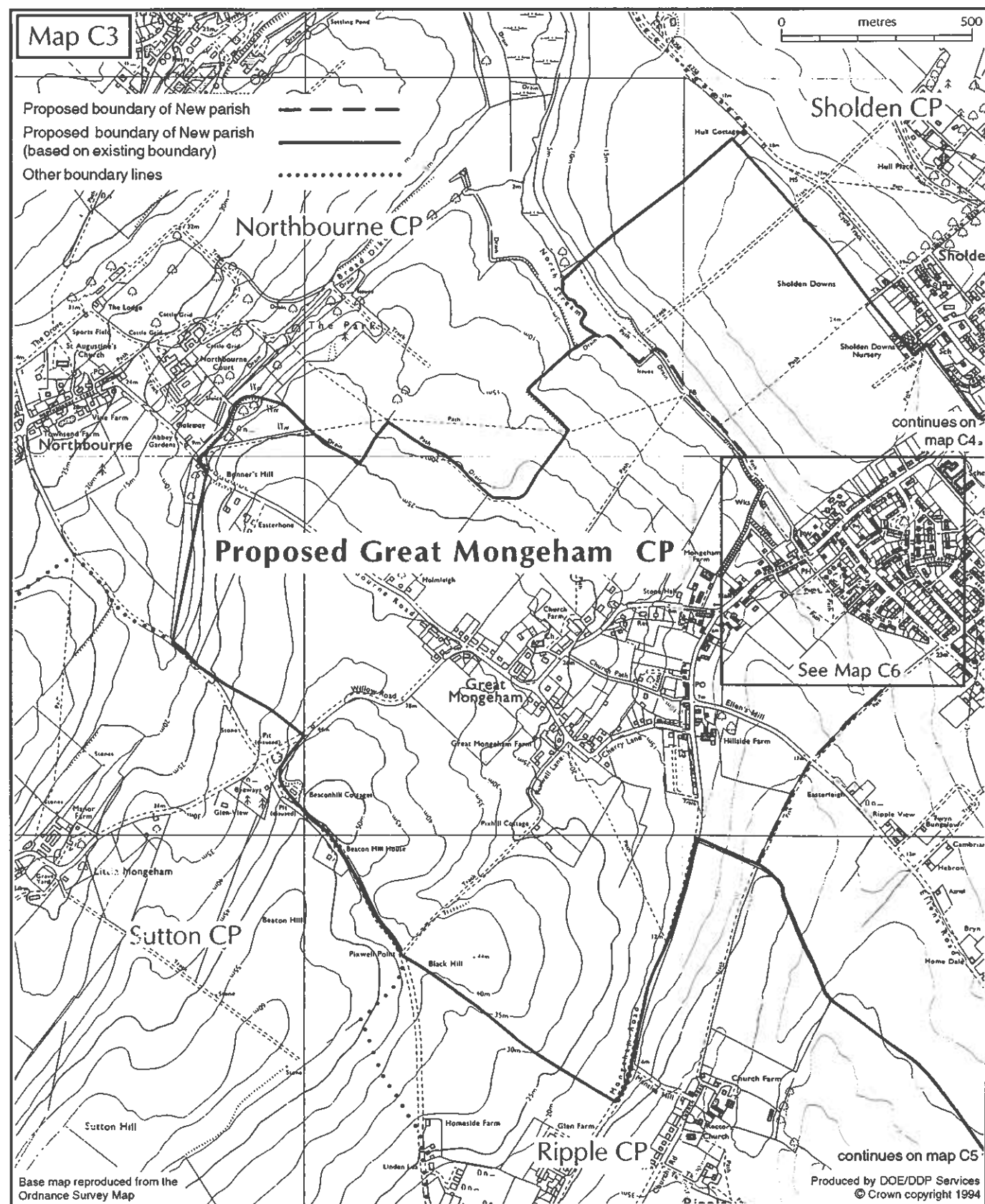
Figure C7
PROPOSED ELECTORAL ARRANGEMENTS IN A PARISH FOR WALMER

Electoral Ward	Electorate	Councillors
Lower Walmer	4,053	9
Upper Walmer	1,992	6
TOTAL	6,045	15

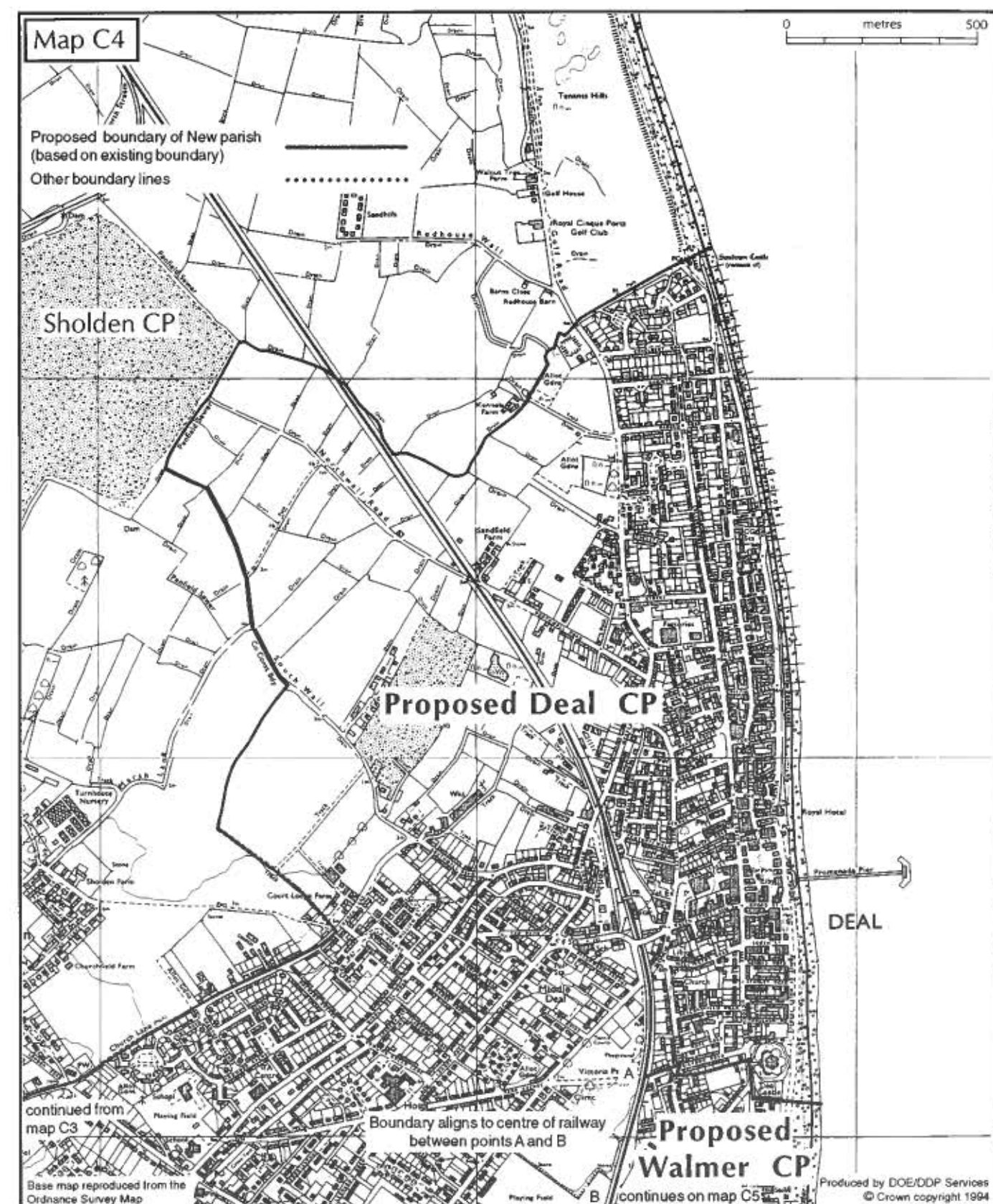
Figure C7
PARISHING PROPOSALS FOR GREAT MONGEHAM, DEAL AND WALMER



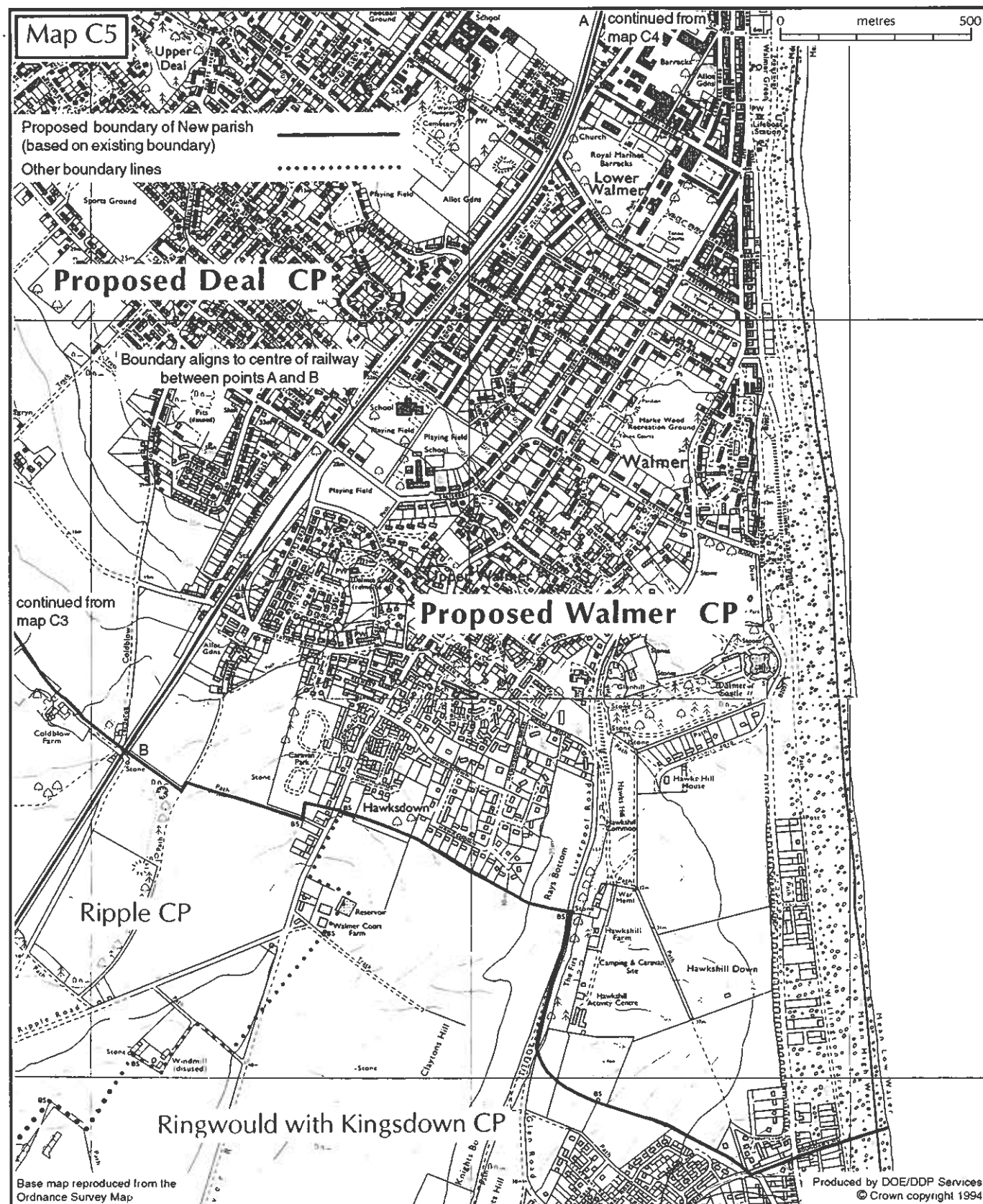
Map C3
PARISHING PROPOSALS FOR GREAT MONGEHAM, DEAL AND WALMER (A)



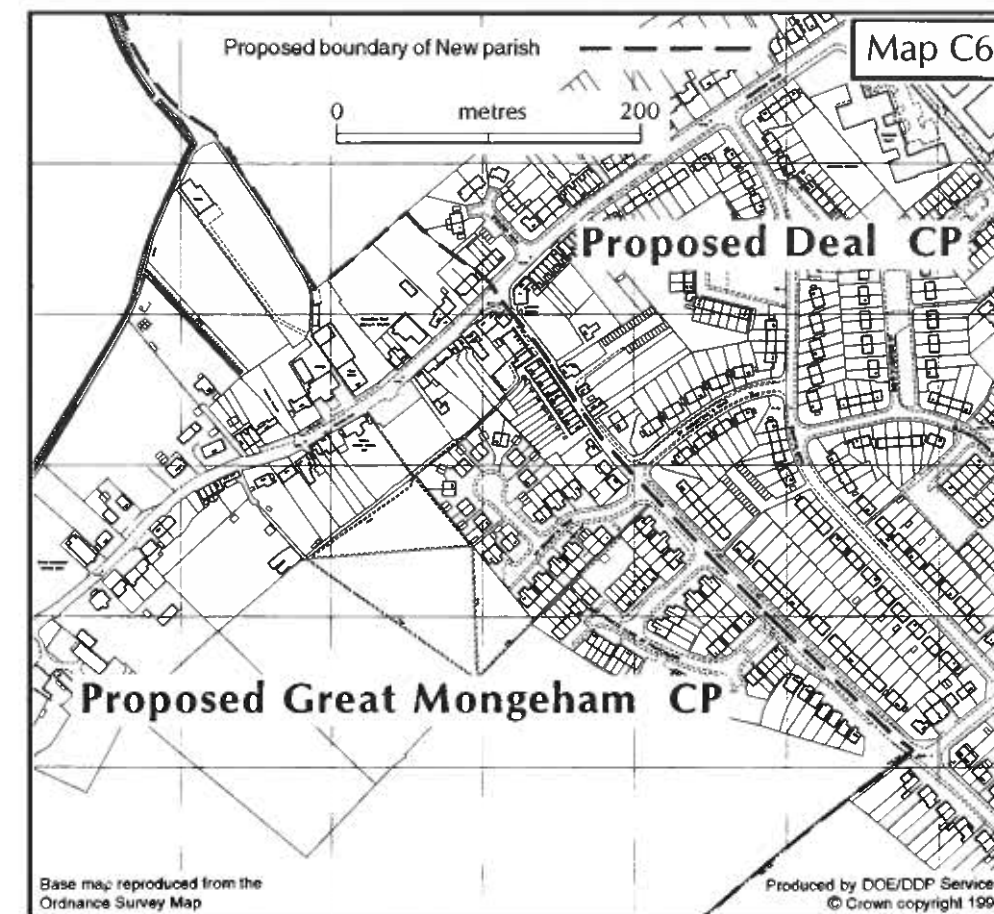
Map C4
PARISHING PROPOSALS FOR GREAT MONGEHAM, DEAL AND WALMER (B)



Map C5
PARISHING PROPOSALS FOR GREAT MONGEHAM, DEAL AND WALMER (C)



Map C6
PARISHING PROPOSALS FOR GREAT MONGEHAM, DEAL AND WALMER (D)



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