

Local Government Boundary Commission for England

Council Size Submission: Guidance

A short guide to making a good submission

February 2025

Introduction

This guidance will assist interested parties in preparing a submission on future governance arrangements and council size to the Local Government Boundary Commission for England ('the Commission') as part of the electoral review process. It highlights the range of issues that the Commission considers when determining council size and will help councillors, officers and others in making strong and well-evidenced submissions.

What is Council Size?

The Local Democracy, Economic Development and Construction Act 2009 gives the Commission the power to review the electoral arrangements of all, or any, principal councils in England. The legislation states that 'the total number of members of the council' forms part of an authority's electoral arrangements. The Commission refers to this more simply as 'council size'. The legislation does not set out how many members (or councillors) each authority (or type of authority) should have. It is the Commission's responsibility to determine the appropriate number of councillors for each authority.

The Commission will always recommend a council size that, in its judgement, enables the council to take its decisions effectively, to discharge the business and responsibilities of the council successfully, and provides for effective community leadership and representation.

General Principles

The Commission recognises that there is considerable variation in council size across England, not only between different types of local authority - metropolitan, unitary, shire district and county councils, and London boroughs - but also between individual authorities of the same type.

In the Commission's opinion, local government is as diverse as the communities it serves - providing leadership, services and representation suited to the characteristics and needs of individual areas. The Commission aims to recommend electoral arrangements, including council size, that are most appropriate for the particular local authority.

An electoral review provides the opportunity for respondents to think carefully about future governance arrangements in the context of changing service delivery needs and the changing roles and expectations of councillors; and what these mean for the future in terms of the number of elected members.

The Commission wants to see evidence that several different council size options have been explored together with the reasons why a particular figure has, or has not, been selected. This should be done irrespective of whether the respondent arrives at the same or a different number of elected members. The most persuasive submissions are those which, rather than considering whether the current number ought not to be changed, reflect on what number of councillors would be required if the council was being newly established.

Good Submissions

'Good' submissions, i.e. those that are considered to be most robust and persuasive, combine a number of components, as well as demonstrating an understanding of the subject

areas in the next section.

It is recommended that the best way to start is to think about the kind of area that councillors will be representing, individually and collectively in the next decade or more. We recognise that such long-term planning will be a challenge, which is why we have highlighted some key components, and areas, which you can use to support your analysis of what your area will look like in the future.

Components of good submissions

These are the principal issues on which submissions should focus in order to ensure a strong and effective argument is constructed.

- **Clarity about objectives:**
 - o Engage specifically with the issue future governance arrangements and council size. Submissions should lead with this issue - the objective of the submission should be to use local evidence to justify thoughts about council size and to articulate the role of councillors and their relationship with the communities they serve.
 - o Good submissions comprise a set of coherent arguments underpinning the proposed council size - addressing contrary views and considering risks, pressures and opportunities associated with alternative approaches. Fundamentally, everything should be drawn back to this central objective.
- **A straightforward and evidence-led style:**
 - o Provide robust demographic and electoral data as well as opinions gathered from councillor surveys;
 - o Consider alternative council size options and their related impacts on council effectiveness - demonstrating that the council has not started with their objective and worked backwards;
 - o Set the submission firmly in the context of the organisation's strategic vision for the future and councillors' role in supporting the delivery of that vision. Place the councillor voice front and centre.
- **An understanding of local place and communities** - a submission that puts forward arguments on council size that are based on local geography and demographics, local community characteristics and how communities are democratically represented.
- **An understanding of councillors' roles and responsibilities** - a submission that demonstrates changing role of councillors as well as the limits and pressures of responsibilities when compared to the resource that councillors have at their disposal (this aspect is explored further in the next section).).

Substantive areas for submissions to cover.

The following are the main practical areas that affect how the council, and councillors, work in the locality.

- **The wider local and national policy context.** This includes:

- o The impact of financial context and challenges. Good submissions are able to weave an understanding of these external pressures, explaining the impact on members' representative role and how services may be constrained as a result;
- o Other national policy trends e.g. trends such as devolution and commercialisation and how these might impact on the councillor role;
- **Local geography, demographic and community characteristics.** These may impact on casework, workload and community engagement - for example, references to the different needs of urban and rural wards, the extent to which "place" is important to councillors and the community, the transience of the local population, the presence of "hidden" or otherwise complex deprivation;
- **An understanding of councillors' roles and responsibilities in the local area.** This will demonstrate the roles of councillors in providing strategic leadership, securing accountability and offering community leadership (including the relationship with parishes where they exist). It will articulate how those roles are changing and should be defined using the voices of councillors concerned. This includes:
 - o **The role of the councillor within the council** - This will include the officer resource to support members, as well as the resource that exists within the member corps itself - the amount of time and capacity for them to do their work alongside employment and caring responsibilities for example. Submissions will also consider: the demarcation between member and officer roles; how councillors exercise a strategic leadership role; how they exert oversight, either through political opposition or scrutiny; how the council's governance model affects the councillor role.
 - o **The role of the councillor within the community** - for example, the wider role of the councillor in providing community leadership beyond formal council duties and the impact on their work.
 - o **The role of the councillor in other institutions** - This will demonstrate the role that councillors play on outside bodies and wider partnership working with its concurrent responsibilities and expectations, e.g. in areas with combined authorities, or two-tier areas, with constituent parished areas.
- **Technology and social media.** This includes how the use of technology and social media by the council as a whole, and by councillors individually, will affect casework, community engagement and local democratic representation.

The Commission's Approach

The Commission aims to construct electoral arrangements that reflect local circumstances and does not apply any strict mathematical criteria nor impose a uniform formula for the national determination of council size. Instead, the Commission assesses each submission on its understanding of the characteristics and needs of each local authority, and its communities, and how the factors described above have informed both the proposed and alternative council sizes considered.

The Commission specifically seeks to understand elected member requirements in the context of three aspects:

- **Strategic Leadership** - how many councillors are needed to give

strategic leadership and direction to the authority?

- **Accountability**
 - o Scrutiny - how many councillors are needed to provide scrutiny to the authority?
 - o Regulatory - how many councillors are needed to meet the regulatory requirements of the authority?
 - o Partnerships - how many councillors are required to manage partnerships between the local authority and other organisations?
- **Community Leadership** - how the representational role of councillors in the local community is discharged and how they engage with people and conduct casework.

In every review, the Commission aims to make a recommendation that will remain relevant for the medium to longer term. Accordingly, we want respondents to adopt a similar perspective. Local authorities should be mindful of the overall appropriateness of the proposed council sizes in terms of governance, specifically in ensuring that an authority is neither too small to discharge its statutory functions nor too large to function in an effective manner and offering purposeful roles for all elected members. Accordingly, whilst recognising that such thresholds might vary depending on the type of local authority and its specific setting, the Commission will look for particularly strong evidence in support of proposals that place the authority amongst the highest and lowest levels of similar councils nationwide, especially where authorities would be below **30** or exceed **100** councillors in size.

There may be other drivers, including financial, considerations but the Commission is not normally persuaded by submissions that are solely based on simple population growth projections or workload assessments. Workload assessments invariably demonstrate that some Councillors spend more time on council business than others and this may be due to a combination of reasons. Rather than a simple aggregated assessment, the Commission finds more value in determining council size, when a workload assessment is undertaken, only if it clearly explains the basis and drivers of changes, specifically how councillors prioritise their work, how much they do that could be done by officers, and the support mechanisms put in place by councils.