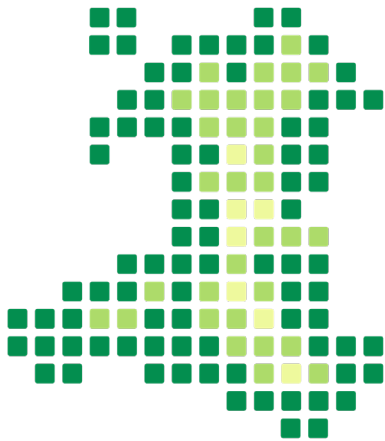


DEMOCRACY AND BOUNDARY COMMISSION CYMRU

**ELECTORAL REVIEWS:  
CONSULTATION ON  
POLICY AND PRACTICE 2025**



Comisiwn  
Democratiaeth  
a Ffiniau Cymru

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Democracy  
and Boundary  
Commission Cymru

## FOREWORD

The Democracy and Boundary Commission Cymru etc. Act 2013 (“the 2013 Act”) requires the Democracy and Boundary Commission Cymru (“the Commission”) to review the electoral arrangements for each principal area in Wales at least once every 12 years.

Before carrying out a review of the electoral arrangements for a principal area (which the Commission describes as an “electoral review”), the Commission is required to consult certain specified bodies (known as “mandatory consultees”) on its intended procedure and methodology for the review, and in particular on how it proposes to determine the appropriate number of members for any principal council in the principal area or areas under review.

This document sets out the Commission’s proposed procedure and methodology and council size policy for the programme of electoral reviews which must be carried out during the 12-year period which started on 30 September 2023. The Commission anticipates that these reviews will start in 2025, and thus refers to this cycle of reviews as the “2025 programme”.

The Commission is now consulting on the policies and practices included within this document. Members of the public and interested parties are invited to submit their views and responses either in writing or via email to the contact details below:

The Chief Executive  
Democracy and Boundary Commission Cymru  
4th Floor  
Welsh Government Building  
Cathays Park  
Cardiff  
CF10 3NQ

Or by email to: [consultations@dbcc.gov.wales](mailto:consultations@dbcc.gov.wales)

no later than 24 March 2025.

Following the consultation the Commission will prepare its final Policy and Practice document for the 2025 programme and publish this document prior to the start of the programme. This final Document will also include a timetable for reviews and the final council size policy that the Commission will be adopting.

**Beverley Smith**  
**Chair**

The Commission welcomes correspondence and telephone calls in Welsh or English.  
This document is available in Welsh

## Background

- 1 The Commission is required to carry out periodic reviews of the electoral arrangements of principal areas in Wales. These reviews are described in this document as “electoral reviews”. The way the Commission conducts an electoral review is defined by legislation and may be guided by directions issued by Welsh Ministers.
- 2 This document sets out the Commission’s proposed procedure and methodology and council size policy for the programme of electoral reviews which must be carried out during the 12-year period which started on 30 September 2023 (and which is known as the “2025 programme”). The Commission is consulting on the contents of this document, and invites responses from members of the public and interested parties.

## Statutory Requirements

### The Democracy and Boundary Commission Cymru etc. Act 2013

- 3 The 2013 Act requires the Commission to review the electoral arrangements of principal councils in Wales. The 2013 Act has recently been amended (and given its new name) by the Elections and Elected Bodies (Wales) Act 2024 .
- 4 Section 21(3) of the 2013 Act provides that the Commission in carrying out its duties must seek to ensure effective and convenient local government. This is the paramount and primary function of the Commission.
- 5 Section 29 of the 2013 Act lays upon the Commission the duty to review the electoral arrangements for each principal area at least once in every 12-year review period.
- 6 The purpose of an electoral review is to consider whether changes should be made to the electoral arrangements of the principal area. At the outcome of the review, the Commission will recommend changes which it considers appropriate to those electoral arrangements (or will recommend that no changes are made). The Commission’s recommendations are made to the Welsh Ministers, who then decide whether to implement changes recommended by the Commission (with or without modifications).
- 7 In this context, the “electoral arrangements” of a principal area are defined in Section 29 (9) of the 2013 Act as:
  - (a) the number of members of the council for the principal area;
  - (b) the number, type and boundaries of the electoral wards into which the principal area is for the time being divided for the purpose for the election of members;
  - (c) the number of members to be elected for any electoral ward in the principal area; and
  - (d) the name of any electoral ward.

When the Commission recommends changes to electoral arrangements at the outcome of an electoral review, it may also recommend consequential changes to the boundaries, council and/or electoral arrangements of a community within the

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area under review, as well as consequential changes to the area of a preserved county (Wales is split into eight preserved counties. They are areas used for the ceremonial purposes of lieutenancy and shrievalty).

### **Considerations for a Review of Principal Area Electoral Arrangements**

- 8 When carrying out an electoral review, the Commission is required by Section 30 of the 2013 Act to have regard to the following factors-
- (a) the desirability of having a ratio of local government electors to the number of members of the council to be elected that is the same, or nearly the same, in every electoral ward of the principal area (which the Commission refers to as “electoral parity”);
  - (b) special geographical considerations, including in particular the size, shape and accessibility of an electoral ward; and
  - (c) any local ties (including local ties connected to the use of the Welsh language) that would be broken by changes to the electoral arrangements in the area.
- 9 When the Commission takes into account considerations of electoral parity (within the meaning of point (a) above), the Commission is also required to take into account:
- (a) any discrepancy between the number of local government electors and the number of persons that are eligible to be local government electors (as indicated by relevant official statistics); and
  - (b) any change to the number or distribution of local government electors in the principal area which is likely to take place in the period of five years immediately following the outcome of the Commission’s electoral review.

### **Balance**

- 10 The Commission’s task is to exercise a balanced judgement taking into account all relevant considerations, with a view to making recommendations for electoral arrangements that will achieve effective and convenient local government.
- 11 In an ideal situation, it would be possible to devise a pattern of electoral ward boundaries in which all electoral wards in a principal area had an equal ratio of electors to councillors, which brought together people in clearly identifiable communities, demonstrated clearly how local government would be both effective and convenient, and resulted in the appropriate number of councillors.
- 12 The geographical, social, economic and administrative make-up of Wales is however not so straightforward as to facilitate the drawing up of ideal electoral patterns. This means that the Commission must consider all relevant factors and exercise a judgement with a view to achieving a pattern of electoral wards which is as close as possible to the ideal described above. Achieving a structure that ensures effective and convenient local government is paramount.

### **Timetable**

- 13 The Commission's proposed timetable for the 2025 programme of electoral reviews can be found at Appendix 1.
- 14 Section 36B(2) of the 2013 Act requires the Commission to use its best endeavours to publish its final report in an electoral review within 12 months of starting the review.

### **Proposed Council Size Policy**

- 15 This section describes how the Commission proposes to determine the appropriate number of councillors for principal councils in Wales.
- 16 For the 2025 programme the Commission proposes to allocate each principal council a range within which the total number of councillors for a council should fall. Details of the methodology followed by the Commission and the appropriate range of councillor numbers for each principal council are set out in Appendix 2.
- 17 The Commission requests that all principal councils respond to this council size policy, including by indicating whether they agree with the category that the Commission has placed them in and the suggested ranges of councillor numbers. The Commission has provided a response template to aid all interested parties in submitting their responses on appropriate number of councillors, which is accessible on the [Commissions website](#). The Commission will consider all responses before finalising its council size policy for the purposes of the 2025 programme.

### **Procedure**

- 18 The procedure for conducting electoral reviews is set out in Chapter 4 of the 2013 Act and is summarised in the following sections.

### **Pre-review Procedure**

- 19 The Commission will designate a Lead Commissioner for each electoral review, whose role will be to lead the Commission's staff through the review and who will present proposals and recommendations internally for the Commission's collective consideration and approval.
- 20 Before conducting an electoral review, the Commission will request that the principal council for the area under review provides electorate data and five-year forecasted electorate figures, in each case broken down to community ward level. The technical advice note in Appendix 3 to this document provides guidance for principal councils on the Commission's requirements and on how forecasted electorate figures can be produced.
- 21 The Commission is also required at the start of the review to take such steps as it considers appropriate to bring the review to the attention of members of the public affected by the review, the mandatory consultees and any other person it considers likely to be interested in the review. If any directions have been given by the Welsh Ministers which are relevant to the review, then the Commission is also required to make the mandatory consultees and such other interested persons aware of these.
- 22 For these purposes, the "mandatory consultees" are defined in Section 34(3) of the Act as:

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- any local authority affected by the review;
- the police and crime commissioner for any police area which may be affected by the review;
- any fire and rescue authority constituted pursuant to the Fire and Rescue Services Act 2004 for an area in Wales which may be affected by the review;
- the National Park authority for a National Park in an area affected by the review,
- the Port Health authority constituted under section 2 of the Public Health (Control of Disease) Act 1984 (c. 22) for a port health district in an area affected by the review,
- the Welsh Language Commissioner
- any organisation representing the staff employed by local authorities which has asked to be consulted; and
- such other persons as may be specified by order made by the Welsh Ministers.

23 Prior to the planned start of the review programme the Commission will provide a number of online briefing sessions about the review process that can be attended by any interested parties. These briefings will describe the Commission's practice and procedures when carrying out electoral reviews.

### **Initial consultation and investigation**

24 At the official start of an electoral review the Commission will publish a statement specifying the date on which the review begins, as required by section 36B(1) of the 2013 Act.

25 The Commission will also communicate with the principal council under review, all the town or community councils in the area, the Members of Parliament and Members of the Senedd for the local constituencies and other interested parties as well as the mandatory consultees listed above to inform them of the review and to request preliminary views on the issues to be considered in the review.

26 The Commission will issue press releases about the review to publicise the review to the media. The Commission will also make available on its website a "partner pack" which will include materials designed to enable key stakeholders to help increase the profile of the review and engagement with the review.

27 The initial consultation period, during which anyone with an interest in the review can submit initial views to the Commission, will last for 6 weeks.

## **Draft Proposals**

- 28 Following the end of the initial consultation period, the Commission will consider the representations it has received and will publish draft proposals for consultation. The Commission will write to the principal council under review, all the community councils in the area, the Members of Parliament and Members of the Senedd for the local constituencies and other interested parties as well as the mandatory consultees to inform them of the draft proposals and to request their views. The Commission will also issue press releases about the proposals and provide publicity material that it will request both the principal council and town and community councils distribute in appropriate places, such as public libraries, town and community notice boards, websites and council newsletters etc in order to raise the profile of the review and to encourage public engagement.
- 29 Following the publication of the Draft Proposals Report there will be a consultation period, lasting 6 weeks, during which representations in relation to the draft proposals can be submitted to the Commission.
- 30 During this consultation period the Commission will offer a briefing via Microsoft Teams to the officials of the principal council under review to discuss the draft proposals and the next stages of the review.

## **Further Consultation**

- 31 Following the period of consultation on the Commission's draft proposals, the Commission will consider the representations it has received and prepare its final recommendations. The Commission's final recommendations may be the same as the proposals in the Commission's Draft Proposals Report, or the Commission may change its proposals in the light of the representations it has received and make recommendations in its final report reflecting those changed proposals.
- 32 However on occasion, after it has received representations, the Commission may wish to bring forward changes to the electoral arrangements of the area under review which are so different from the proposals in the Commission's Draft Proposals Report that the proposed changes amount to new proposals. Where this is the case, the Commission may engage in supplementary consultation in relation to its new proposals.
- 33 Any supplementary consultation period will usually last 4 weeks. The Commission will write to the principal council under review, all the community councils in the area, the Members of Parliament and Members of the Senedd for the local constituencies and other interested parties as well as the mandatory consultees to inform them of the further draft proposals, to request their views. The Commission will also issue press releases about the further proposals and provide publicity material that it will request both the principal council and town and community councils distribute in appropriate places, such as public libraries, town and community notice boards, websites and council newsletters etc in order to raise the profile of the review and to encourage public engagement.



- 34 When the Commission is ready, it will publish its final recommendations in the review (in a report known as a Final Recommendations Report) and submit them to Welsh Government. The Commission will write to the principal council under review, all the community councils in the area, the Members of Parliament and Members of the Senedd for the local constituencies and other interested parties as well as the mandatory consultees to inform them of its submission of recommendations to Welsh Government. The Commission will also issue press releases about the recommendations and provide publicity material that it will request both the principal council and town and community councils distribute in appropriate places, such as public libraries, town and community notice boards, websites and council newsletters etc.
- 35 Once the Commission has published its Final Recommendations Report, there is no further opportunity to provide representations to the Commission.
- 36 It is then for the Welsh Ministers to decide how they wish to proceed in relation to the Commission's recommendations. If the Welsh Ministers choose to implement the Commission's recommendations (with or without modifications) they will do so by making an Order, after waiting for a period of six weeks as required by section 37(3A) of the 2013 Act. During that six week period, anyone with an interest will have the opportunity to submit representations to the Welsh Ministers in relation to the representations.

**Matters which the Commission will consider during an electoral review**

- 37 Typically, electoral reviews present a range of issues and challenges which require a judgement on balance, taking into account matters, in addition to statutory requirements, that include the following:
- effective and convenient local government;
  - electoral parity (number of electors per councillor);
  - considerations that might justify atypical levels of electoral parity, such as particular community ties;
  - topography of the land, hills and rivers creating natural boundaries and motorways/railways forming man-made boundaries;
  - variable factors (such as deprivation, student populations and tourism);
  - differences between rural and urban areas; and,
  - community area boundaries and any community ward boundaries – since the Commission will use communities and community wards as the “building blocks” for principal area electoral wards.
- 38 The Commission will take into account all of these factors when designing proposals and making recommendations, and invites respondents to consider each of these when submitting representations to the Commission during electoral reviews.

*Effective and convenient local government*

- 39 It is a duty of the Commission to recommend to Welsh Ministers electoral arrangements that are designed to achieve effective and convenient local government for principal councils.

- 40 In seeking to ensure effective and convenient local government, the Commission, when considering potential electoral arrangements, seeks to ensure that electoral wards are internally coherent. In the Commission's view, this means that there are reasonable road links across the electoral ward so that it can be easily traversed, and that all electors in the ward can engage in the affairs and activities of all parts of it without having to travel through an adjoining ward. This may not be the case, for example, if a potential electoral ward boundary amalgamates two communities where a feature such as a mountain or river divides them.
- 41 Factors including convenient access to elected members by the electors and people they represent, patterns of settlements and ease of communications within electoral areas will be taken into account.

*Electoral parity and Numbers of Councillors*

- 42 As described above, the Commission is required to take into account the desirability of electoral parity when it carries out electoral reviews. Electoral parity refers to a situation in which the ratio of electors to elected members is the same, or nearly the same, in every electoral ward in the principal area.

The information which the Commission receives about the number of electors in an area will enable it to determine ward boundaries, and numbers of elected councillors for each ward, with a view to achieving electoral parity. The Commission will seek to achieve electoral ratios for electoral wards which are close to the council average, but the Commission nonetheless acknowledges that some degree of variance is inevitable in practice.

- 43 The Commission's policy will be to attempt to achieve a level of variance that is not greater than 20% from the council average for any electoral ward. However, the Commission takes the view that each council is different and that some councils and electoral wards will be able to provide for a better level of electoral parity than others. The Commission will seek to provide the best level of electoral parity for each area under review and will take each case on its merit. The Commission takes the view that departing from the average ratio for the council can only be justified by clear evidence of other balancing factors, such as local ties or other relevant considerations.
- 44 Many principal councils have both urban and rural electoral wards. On occasion the Commission has received comments to the effect that urban areas should have proportionately more councillors than rural areas because urban areas present more complex issues. Others have argued that rural areas should have proportionately more councillors because rural populations are more dispersed, and therefore harder to contact. There is no provision in legislation for such an approach. Increasing use of electronic communication methods generally makes no distinction between urban and rural areas. However, there may be exceptions where local characteristics, including topography and the availability of high-speed broadband, lead to an acceptance of a particular variance in electoral ratio for one or more electoral wards.
- 45 The Commission has commissioned independent research regarding the workload of County Councillors in Wales. The research shows that the biggest impact on the workload of a councillor

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is the various cabinet and committee responsibilities, however deprivation also has a large impact on the workload of a councillor. The report can be found on the [Commission's website](#), and the Commission has taken it into account in determining the approach to its council size policy which is set out above.

- 46 As noted above, the 2013 Act places a further requirement on the Commission to take into account “...any discrepancy between the number of local government electors and the number of persons eligible to be local government electors (as indicated by relevant official statistics)”. The Commission relies on the Office for National Statistics (ONS) to provide population figures, on the basis of which the discrepancy between the number of registered electors and the local population can be assessed. However it is often the case that population figures and elector numbers are recorded across slightly different local areas, so the discrepancy can only be the subject of a rough estimate. The Commission will utilise the available statistics as best it can and where it is appropriate to do so.
- 47 The Commission’s general aim is that electoral parity in a principal area should improve as a result of an electoral review. This will be informed by the data provided by councils as to current electors as well as five-year electoral forecasts. The Commission will consider and respond to the implications of changes in the number and distribution of electors which are forecast. The Commission looks to councils to provide estimates of electorate changes supported by appropriate evidence. However, in the experience of the Commission the projected figures are often at significant variance with actual changes in the number of electors which occur subsequently, and the Commission will also take this into account in its decision-making (see further below).

### *Multi-member electoral wards*

- 48 The Commission considers that multi-member electoral wards are more likely to be effective and convenient in urban areas than in rural areas. In areas of denser population, such as is found in urban areas, it is possible that many of the issues which a councillor may be called upon to address may be broadly similar in nature and may therefore allow multiple councillors to deal with similar issues. The Commission considers that multi-member wards in rural areas would lead to very large geographical areas which would cause issues to the electors and the elected members such as travel and time.
- 49 The Commission considers that it is not desirable to have more than 4 elected members per ward in a first-past-the-post electoral system since this may dilute accountability to the electorate to an excessive degree. Furthermore an election is increasingly difficult for electoral administrators and returning officers to administer where there are more than 4 members per ward. Accordingly, the Commission will not recommend any new multi-member wards with more than 4 members other than in exceptional circumstances.

### *Five-year forecasted figures*

- 50 The Commission must have regard to five-year projected electorate figures as part of its deliberations when creating proposals and recommendations. As noted above, the Commission requests these projections from the principal council under review. The Commission is aware that projections are not an exact science and therefore while the Commission will have regard

to the principal council's projected figures, the Commission will give greater weight to current electorate figures provided by the council.

### *Population figures*

- 51 The Commission will have regard to the population figures that are provided to it by the Office for National Statistics (ONS), as described above. The Commission uses the mid-year estimates of populations for national and local areas. These are based on Census data, updated with information from a variety of sources which are published annually. The Commission will refer in its deliberations to the most recently published mid-year estimate at the time when the electoral review started.

### *Communities*

- 52 There can be some confusion over what is meant by the word community. Some may consider it to refer to the street in which they live, others a more broad village area, others much larger areas. All of these are entirely accurate and reflect the lives of people and the differences and similarities of places where we live, work and interact. However, in Wales there is an additional and more technical meaning to the word as the whole of Wales is divided into community areas.
- 53 Many community areas have community or town councils. Where a community area has a community or town council then these areas may be divided into wards for electoral purposes. Over two-thirds of Wales' population is covered by town and community councils.
- 54 The Commission will use communities and community wards as its primary "building blocks" making up electoral wards.
- 55 The 2013 Act also enables the Commission to recommend changes to community and community ward boundaries as a consequence of changes to the electoral ward boundaries.
- 56 Accordingly, the Commission has flexibility as to how it uses the existing communities and community wards as building blocks to create electoral wards. However in creating electoral wards the Commission must have regard to the desirability of fixing boundaries which are and will remain easily identifiable, and the desirability of not breaking local ties (these requirements are considered in more detail below). The Commission will ensure that proposals for significant changes to electoral ward boundaries and for consequential changes to community and community ward boundaries are subject to consultation (either in a draft proposals report or in a supplementary consultation) before being included in a Final Recommendations Report. The Commission will especially welcome representations relating to proposals for changes to boundaries that are supported by clear and relevant evidence.

### *Easily identifiable boundaries*

- 57 The Commission will generally use community areas and, where they exist, community wards as the primary building blocks for electoral wards. This in effect means that the boundaries of any proposed electoral wards are usually formed from the boundaries of existing local government areas and as such should be easily identifiable. This does however depend on community boundaries and community ward boundaries being regularly reviewed by the

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principal council to take account of new developments that cross existing boundaries.

- 58 On occasion during an electoral review the Commission may identify changes that have occurred in a local area that might suggest that electoral ward boundaries should be changed, in circumstances where those changes in the area have not yet been reflected in changes to communities or community wards. For example, it may be the case that a large new housing development has been created across existing electoral ward and community boundaries. In these situations, the Commission may consider in the course of an electoral review whether the electoral ward boundaries should be changed so as to be more easily identifiable in light of the changes to the area. If the Commission considers that electoral ward boundaries should be changed in this way, it may also consider whether consequential changes to community or community ward boundaries should be made for the same or related reasons.
- 59 Where changes to community or community ward boundaries are considered as a consequence of changes proposed to electoral ward boundaries, the Commission will seek to ensure that these new boundaries are easily identifiable in the same way.
- 60 More generally, roads can influence the boundaries between electoral wards or communities, for example if they are the location of shops or community facilities which people visit regularly and where they interact, or if they are the source of community interactions for example in relation to safety, environmental or economic considerations. Alternatively, major highways, rivers or railway lines are often physical barriers marking the boundary between different communities. The Commission will take into account geographic elements such as these in seeking to arrive at identifiable boundaries between electoral units.

### *Local ties*

- 61 The legislation requires the Commission to have regard to any local ties which would be broken by changes to electoral arrangements. This may be particularly relevant when proposals are made for new arrangements that divide existing electoral wards. However, such is the complexity of the term “local ties” that people may consider that their area has ties to a number of other areas. It can also be the case that those sharing an interest in the physical maintenance and management of their immediate living environment may consider that their local ties are within quite confined boundaries.
- 62 However, the Commission may also receive representations from those who may have an interest in the way their general hospital or secondary school provides services or in the continuation of a large-scale employer and thus identify themselves as also part of a community much wider in extent. This often leads to suggestion of local ties between multiple community areas (whether they have a community or town council or not) and can often bring deep opposition to dividing those areas into 2 (or more) electoral wards where they were previously contained within 1.
- 63 Another example of local ties could be that an area identifies itself as a Welsh-speaking area. The Commission takes into account the Welsh language characteristics of an area when conducting an electoral review, and has a general duty to promote the use of the Welsh language. The Commission will utilise census data to attempt to ensure that it does not put forward proposals which would undermine the use of the Welsh language.

64 The Commission often only hears from respondents who oppose its proposals on the basis that they would break local ties. The Commission also asks that respondents tell it when its proposals do reflect local ties, so that any support for the Commission's proposals can be taken into account when the Commission decides whether to reflect its proposals in its final recommendations.

65 In many areas electoral wards will need to be greater in physical extent than individual communities due to considerations of electoral parity. In these instances the Commission will combine 2 or more communities within individual electoral wards.

#### *Electoral ward names*

66 As part of an electoral review, the Commission considers the names of electoral wards in the area under review. The Commission's general practice will be to recommend changes to the name of an electoral ward if it considers that the name can be improved, whether or not the Commission is also recommending changes to other electoral arrangements affecting that ward.

67 In the light of the Commission's duty to promote the use of the Welsh language, the Commission's general preference will be for electoral wards to bear a single name in the Welsh language which is acceptable for use in English.

68 The Commission will regard a Welsh-language name as acceptable for use in English if it considers that the name is likely to be recognisable to residents of the same broad area of Wales whose primary language is not Welsh. This may be because (for example) the name is composed of a place name which is the same or similar in Welsh and English or because the place name in Welsh is particularly well-known in the area.

69 If the Welsh-language name is composed of more than 1 word, the Commission will regard that name as acceptable for use in English only if every word of the name is likely to be recognisable in this way. Accordingly:

- if the Welsh-language name incorporates 1 or more place names which are likely to be recognisable in this way as well as a place name which is not, the Commission will not regard that name as acceptable for use in English;
- if the Welsh-language name incorporates words which are not place names (for example a geographic designation such as "north", "south" or "central") the Commission will usually not regard that name as acceptable for use in English;
- however if the Welsh-language name is composed solely of place names which are likely to be recognisable in this way together with a Welsh-language word meaning "and", the Commission will regard that name as acceptable for use in English.

70 The Commission will also propose names that aim to avoid the need for mutations in Welsh in order to make names more recognisable.

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- 71 If the Commission is unable to identify a suitable single name in the Welsh language which is acceptable for use in English in relation to an electoral ward, the Commission will propose alternative names for that ward in Welsh and English.
- 72 The Commission will consult with the Welsh Language Commissioner (WLC) in relation to the names of electoral wards in the area which is subject to an electoral review. The WLC is responsible for advising on the standard forms of Welsh place-names. The WLC has convened a Place-names Standardisation Panel to provide recommendations and expert advice in this field. In forming its recommendations, the Panel follows national standardisation guidelines and also gives consideration to the meaning, history and etymology of the place-names, as well as their usage. The WLC has agreed to provide specialist advice to the Commission regarding how electoral ward names should be spelt in official contexts.
- 73 The Commission welcomes suggestions as to electoral ward names at all stages of an electoral review.

### *Representations*

- 74 The Commission encourages principal councils, town and community councils, elected representatives, interested parties and the general public to make representations and suggestions as part of the process of electoral reviews. The Commission welcomes representations that are based on evidence and facts which are relevant to the electoral arrangements under consideration. The Commission will consider and acknowledge every representation made. If any person or body makes a representation to the Commission and does not receive an acknowledgment, they should contact the Commission to ensure it has received the representation. If your representation is not acknowledged, then it is highly likely the Commission has not received the representation and it will not be considered in the Commission's deliberations. If you have not received an acknowledgement in response to your representations please get in touch with the Commission.
- 75 All representations which the Commission receives will be published on the Commission's website alongside the Commission's Draft Proposals and Final Recommendation Reports. To protect the privacy of individuals participating in the reviews, the Commission will take the following approach to redacting personal information contained in the written representations that the Commission publishes.
- 76 Representations from public figures and officials (such as councillors, Members of Parliament or Members of the Senedd) acting in an official capacity:
- the Commission will publish the name of any public figure or official writing in an official capacity
  - however, all postal and email addresses, telephone numbers and signatures will be redacted
- 77 Representations from members of the public, and from public figures or officials writing in a personal capacity:
- the Commission will redact the name and postal address of individuals submitting

representations, but will publish the approximate location of the individual's postal address – that is, by reference to the village, town or city stated

- all email addresses, telephone numbers and signatures will be redacted

78 The Commission will also redact anything in a representation that could be illegal, libellous or both.

79 The Commission wishes to encourage representations from those with local knowledge of their area to suggest appropriate electoral arrangements to the Commission when a review is being undertaken. The Commission will accept representations by email, letter or via its consultation portal. All communication details will be provided at the start of a review.

### Conclusion

80 An electoral review is an exercise of the Commission's statutory responsibility, the application of powers given to the Commission, and the use of judgement which the legislation calls for. The Commission's policies are intended to give confidence in how it will approach the challenges in any review, but do not preclude striking the right balance in the particular circumstances of the communities and principal council under review. The Commission exercises a collective judgment in determining issues in its reviews and the consideration given to the issues and the reasoning adopted will be explained in the Commission's reports.

81 As noted above, the Commission is required to consult certain specified bodies (known as "the mandatory consultees") on its intended procedure and methodology for the 2025 programme of electoral reviews, and on its council size policy for the programme. The Commission is therefore consulting on the matters included within this document. Members of the public and interested parties are invited to submit their views and responses either in writing or via email to the contact details below:

The Chief Executive  
Democracy and Boundary Commission Cymru  
4th Floor  
Welsh Government Building  
Cathays Park  
Cardiff  
CF10 3NQ

Or by email to: [consultations@dbcc.gov.wales](mailto:consultations@dbcc.gov.wales)

82 Responses to this consultation must be received by the Commission no later than 24 March 2025. The Commission will consider all responses it receives by this deadline, and will take them into account in finalising its policies, procedures and council size policy for the 2025 programme, which it will publish when ready.





## Appendix 2

### COUNCIL SIZE METHODOLOGY

#### Key Principals

##### 1. Minimum and Maximum Council Size:

- Council size should not be less than 30 members.
- Council size should not normally exceed 75 members.

##### 2. Exclusion of Cardiff:

- Cardiff is excluded from calculations due to its significantly higher population and density. Cardiff Council currently has 79 members, which will be the starting point for future reviews. Should Cardiff be included within the calculations the Commission deems that this number of councillors would be unmanageable and would not provide for effective and convenient local government.

#### Methodology

##### 1. Population Factor:

- The smallest council size is set at 30 members.
- The principal council area with the smallest population is Merthyr Tydfil (58,593). This is considered the minimum population.
- Additional councillors are allocated based on the population over this minimum. The range of councillors (30 to 75) is proportioned to the range of populations over the minimum (58,593 to 246,742).

##### 2. Sparsity Factor:

- Population density is calculated by dividing the population by the area.
- A sparsity factor is determined by expressing each council's population density as a percentage of the highest density (Newport at 859.2) and then inverting it.
- Additional councillors are allocated based on this sparsity factor.

##### 3. Deprivation Factor:

- Councils with 10-20% of their areas in the most deprived 20% of LSOAs in Wales receive 1 additional councillor.
- Councils with more than 20% in the most deprived areas receive 2 additional councillors.
- Councils already at the maximum of 75 members do not receive additional councillors.

##### 4. Rurality Factor:

- Councils with 40-75% of their built-up areas (BUAs) under 10,000 people receive 1 additional councillor.
- Councils with more than 75% of their BUAs under 10,000 people receive 2 additional councillors.
- Councils already at the maximum of 75 members do not receive additional councillors.

##### 5. Recommended 10% Change Cap:

- A recommended 10% maximum change from the existing number of councillors is applied.
- Councils already at the maximum of 75 or minimum of 30 members do not receive additional or fewer councillors.

##### 6. Range:

- Each principal council is allocated a range of number of councillors.
- Councils are asked to provide their preferred number of councillors within this range in their response to the policy and practice consultation.

## COUNCIL SIZE METHODOLOGY

### Key Principals

#### 1. Minimum and Maximum Council Size:

- Council size should not be less than 30 members.
- Council size should not normally exceed 75 members.

#### 2. Exclusion of Cardiff:

- Cardiff is excluded from calculations due to its significantly higher population and density. Cardiff Council currently has 79 members, which will be the starting point for future reviews. Should Cardiff be included within the calculations the Commission deems that this number of councillors would be unmanageable and would not provide for effective and convenient local government.

### Methodology

#### 1. Population Factor:

- The smallest council size is set at 30 members.
- The principal council area with the smallest population is Merthyr Tydfil (58,593). This is considered the minimum population.
- Additional councillors are allocated based on the population over this minimum. The range of councillors (30 to 75) is proportioned to the range of populations over the minimum (58,593 to 246,742).

#### 2. Sparsity Factor:

- Population density is calculated by dividing the population by the area.
- A sparsity factor is determined by expressing each council's population density as a percentage of the highest density (Newport at 859.2) and then inverting it.
- Additional councillors are allocated based on this sparsity factor.

#### 3. Deprivation Factor:

- Councils with 10-20% of their areas in the most deprived 20% of LSOAs in Wales receive 1 additional councillor.
- Councils with more than 20% in the most deprived areas receive 2 additional councillors.
- Councils already at the maximum of 75 members do not receive additional councillors.

#### 4. Rurality Factor:

- Councils with 40-75% of their built-up areas (BUAs) under 10,000 people receive 1 additional councillor.
- Councils with more than 75% of their BUAs under 10,000 people receive 2 additional councillors.
- Councils already at the maximum of 75 members do not receive additional councillors.

#### 5. Recommended 10% Change Cap:

- A recommended 10% maximum change from the existing number of councillors is applied.
- Councils already at the maximum of 75 or minimum of 30 members do not receive additional or fewer councillors.

#### 6. Range:

- Each principal council is allocated a range of number of councillors.
- Councils are asked to provide their preferred number of councillors within this range in their response to the policy and practice consultation.

## Council Size Methodology

1. This council size utilises published population and area statistics in order to calculate an optimum council size for each principal council area. This methodology is based on the following principals:

- Council size should not be less than 30 members;
- Council size should not normally be more than 75 members;
- population;
- population sparsity;
- Deprivation;
- Rurality, and,
- Recommended 10% change cap

It was also considered that Cardiff should be taken out of all calculations because of both its substantially higher population and population density. Cardiff Council currently has 79 members and that will be the starting point for any future reviews.

The following table shows the existing number of councillors and the population sizes for each principal council area.

<b>Authority</b>	<b>Population (2023 ONS MYE)</b>	<b>Current Councillors</b>
Blaenau Gwent	67,356	33
Bridgend	146,743	51
Caerphilly	176,437	69
Cardiff	383,536	79
Carmarthenshire	190,083	75
Ceredigion	73,050	38
Conwy	114,410	55
Denbighshire	97,156	48
Flintshire	155,812	66
Gwynedd	119,173	69
Isle of Anglesey	69,291	35
Merthyr Tydfil	58,593	30
Monmouthshire	94,572	46
Neath Port Talbot	142,898	60
Newport	163,628	51
Pembrokeshire	125,006	60
Powys	134,439	68
Rhondda Cynon Taf	241,178	75
Swansea	246,742	75
Torfaen	93,419	40
Vale of Glamorgan	134,733	54
Wrexham	136,149	56

The population information is from the 2023 Mid-Year Estimate figures published by the ONS.

### Population Factor

3. On the basis that the smallest council size should be 30, all areas are given this allocation as the minimum number of councillors (Min Cllrs). The principal council area with the smallest population is Merthyr Tydfil with 58,593 so this has been considered the minimum population and the population over this minimum has been calculated (Population over Min). The number of additional councillors based on population size (Additional Pop Cllrs) has then been calculated by proportioning the range of numbers of councillors (30 to 75 = 45) to the range of populations over the minimum (58,593 to 246,742 = 188,149). Dividing 188,149 by 45 gives an allocation of 1 councillor per 4,181 people. The number of additional councillors is then calculated by dividing the population over the minimum by 4,181. For example, Denbighshire has a population of 35,107 over the minimum this, when divided by 4,181, gives a total of 8 (8.3 rounded down) additional councillors.

<b>Authority</b>	<b>Min Cllrs</b>	<b>Population</b>	<b>Pop over min</b>	<b>Additional Pop Cllrs</b>
Blaenau Gwent	30	67,356	8,763	2
Bridgend	30	146,743	88,150	21
Caerphilly	30	176,437	117,844	28
<b>Cardiff</b>	<b>30</b>	<b>383,536</b>	<b>324,943</b>	
Carmarthenshire	30	190,083	131,490	31
Ceredigion	30	73,050	14,457	3
Conwy	30	114,410	55,817	13
Denbighshire	30	97,156	38,563	9
Flintshire	30	155,812	97,219	23
Gwynedd	30	119,173	60,580	14
Isle of Anglesey	30	69,291	10,698	3
Merthyr Tydfil	30	58,593	-	-
Monmouthshire	30	94,572	35,979	9
Neath Port Talbot	30	142,898	84,305	20
Newport	30	163,628	105,035	25
Pembrokeshire	30	125,006	66,413	16
Powys	30	134,439	75,846	18
Rhondda Cynon Taf	30	241,178	182,585	44
Swansea	30	246,742	188,149	45
Torfaen	30	93,419	34,826	8
Vale of Glamorgan	30	134,733	76,140	18
Wrexham	30	136,149	77,556	19

The population information is from the 2023 Mid-Year Estimate figures published by the ONS.

## Sparsity Factor

4. The following table shows the area for each principal council area as derived from the standard area measurements published by ONS published in December 2022. The population density (Pop Density) has been calculated by dividing the population by the area. A Sparsity Factor has then been calculated by expressing each principal council's population density (Pop Density) as a percentage of the highest density figure (Newport at 859.2) and expressed as an inverse so that areas with the highest densities will have the lowest percentage figures.

Authority	Population	Area (sq km)	Pop Density	Sparsity Factor
Blaenau Gwent	67,356	109	619.49	28%
Bridgend	146,743	251	585.13	32%
Caerphilly	176,437	277	636.07	26%
<b>Cardiff</b>	<b>383,536</b>	<b>141</b>	<b>2721.77</b>	
Carmarthenshire	190,083	2,370	80.19	91%
Ceredigion	73,050	1,785	40.92	95%
Conwy	114,410	1,126	101.62	88%
Denbighshire	97,156	837	116.09	86%
Flintshire	155,812	440	354.25	59%
Gwynedd	119,173	2,535	47.01	95%
Isle of Anglesey	69,291	712	97.31	89%
Merthyr Tydfil	58,593	111	525.75	39%
Monmouthshire	94,572	849	111.37	87%
Neath Port Talbot	142,898	441	323.85	62%
Newport	163,628	190	859.25	0%
Pembrokeshire	125,006	1,618	77.24	91%
Powys	134,439	5,181	25.95	97%
Rhondda Cynon Taf	241,178	424	568.61	34%
Swansea	246,742	378	653.42	24%
Torfaen	93,419	126	743.20	16%
Vale of Glamorgan	134,733	331	406.87	53%
Wrexham	136,149	504	270.26	69%

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5. The number of additional councillors for each principal council in respect of population sparsity (Sparsity Cllrs) is then calculated by applying the Sparsity Factor (described in the table above) to the number of Population Councillors (Pop Cllrs). For example for Neath Port Talbot the number of Sparsity Councillors is 62% of 20 which is 12 (12.4 rounded down).

<b>Authority</b>	<b>Pop Cllrs</b>	<b>Sparsity Cllrs</b>
Blaenau Gwent	2	1
Bridgend	21	7
Caerphilly	28	7
<b>Cardiff</b>		
Carmarthenshire	31	28
Ceredigion	3	3
Conwy	13	11
Denbighshire	9	8
Flintshire	23	14
Gwynedd	14	13
Isle of Anglesey	3	3
Merthyr Tydfil	0	0
Monmouthshire	9	8
Neath Port Talbot	20	12
Newport	25	0
Pembrokeshire	16	15
Powys	18	17
Rhondda Cynon Taf	44	15
Swansea	45	11
Torfaen	8	1
Vale of Glamorgan	18	10
Wrexham	19	13

## Deprivation Factor

6. For this Review Programme the Commission has also included a factor for areas of high deprivation. Principal councils with a percentage between 10 and 20 of the most deprived 20% LSOA's in Wales have been allocated an additional councillor, those with a percentage higher than 20 have been allocated a further councillor (total of 2). The number of allocated councillors following the deprivation factor is shown as Dep Cllrs in the table. Those with an allocation of 75 are already at the maximum number of councillors allowed within this policy and therefore no additional councillors have been added.

<b>Authority</b>	<b>% LSOAs in Most Deprived 20% (WIMD 2019)</b>	<b>Additional Cllrs for Deprivation</b>
Blaenau Gwent	45	2
Bridgend	20	1
Caerphilly	24	2
Cardiff	28	
Carmarthenshire	11	1
Ceredigion	4	0
Conwy	13	1
Denbighshire	16	1
Flintshire	11	1
Gwynedd	5	0
Isle of Anglesey	14	1
Merthyr Tydfil	31	2
Monmouthshire	2	0
Neath Port Talbot	33	2
Newport	35	2
Pembrokeshire	11	1
Powys	6	0
Rhondda Cynon Taf	29	2
Swansea	24	2
Torfaen	32	2
Vale of Glamorgan	13	1
Wrexham	12	1



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**Rurality Factor**

7. For this Review Programme the Commission has also included a factor for areas of high rurality. Principal councils with a percentage between 40 and 75 of its build up areas (BUA's) being under 10,000 people have been allocated an additional councillor, those with a percentage higher than 75 have been allocated a further councillor (total of 2). Those with an allocation of 75 are already at the maximum number of councillors allowed within this policy and therefore no additional councillors have been added.

<b>Authority</b>	<b>% population in BUA's &lt; 10K (ONS 2001)</b>	<b>Additional Rural Cllrs</b>
Blaenau Gwent	34	0
Bridgend	23	0
Caerphilly	59	1
<b>Cardiff</b>	<b>3</b>	<b>3</b>
Carmarthenshire	69	1
Ceredigion	80	2
Conwy	48	1
Denbighshire	54	1
Flintshire	60	1
Gwynedd	86	2
Isle of Anglesey	84	2
Merthyr Tydfil	33	0
Monmouthshire	61	1
Neath Port Talbot	40	0
Newport	18	0
Pembrokeshire	79	2
Powys	92	2
Rhondda Cynon Taf	36	0
Swansea	24	0
Torfaen	17	0
Vale of Glamorgan	37	0
Wrexham	57	1

The BUA information is published by the ONS based on the 2021 Census data.

## Allocations

Authority	Min Cllrs	Additional Pop Cllrs	Sparsity Cllrs	Additional Cllrs for Deprivation	Additional Rural Cllrs	Allocation
Blaenau Gwent	30	2	1	2	0	35
Bridgend	30	21	7	1	0	59
Caerphilly	30	28	7	2	1	68
<b>Cardiff</b>	<b>30</b>					
Carmarthenshire	30	31	28	1	1	91
Ceredigion	30	3	3	0	2	38
Conwy	30	13	11	1	1	56
Denbighshire	30	9	8	1	1	49
Flintshire	30	23	14	1	1	69
Gwynedd	30	14	13	0	2	59
Isle of Anglesey	30	3	3	1	2	39
Merthyr Tydfil	30	-	0	2	0	32
Monmouthshire	30	9	8	0	1	48
Neath Port Talbot	30	20	12	2	0	64
Newport	30	25	0	2	0	57
Pembrokeshire	30	16	15	1	2	64
Powys	30	18	17	0	2	67
Rhondda Cynon Taf	30	44	15	2	0	91
Swansea	30	45	11	2	0	88
Torfaen	30	8	1	2	0	41
Vale of Glamorgan	30	18	10	1	0	59
Wrexham	30	19	13	1	1	64

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**Final Allocations**

8. For this Review Programme the Commission has allocated each Principal Council a range of number of councillors which takes into account all of the factors listed in the sections above. The Commission has also included a factor of a recommended 10% maximum change from the existing arrangements as anything larger would cause significant disruption across the whole Principal Council. The Commission has maintained the position that no council should have more than 75 councillors and no council should have less than 30 councillors. It should be noted that Cardiff has been taken out of all calculations because of both its substantially higher population and population density.

The Commission will ask each principal council in their response to the policy and practice consultation to set out their preferred number of councillors from within the allocated range. The Commission has provided a template which responses to the council size policy should be made, in order to make sure that the submission is evidenced. The Commission will consider responses from any interested parties.

<b>Authority</b>	<b>Existing Councillors</b>	<b>Allocation</b>	<b>Allocation with Cap</b>	<b>Range</b>
Blaenau Gwent	33	35	35	30-35
Bridgend	51	59	56	46-59
Caerphilly	69	68	68	62-68
<b>Cardiff</b>	<b>79</b>			<b>78-79</b>
Carmarthenshire	75	91	75	67-75
Ceredigion	38	38	38	34-38
Conwy	55	56	56	49-56
Denbighshire	48	49	49	43-49
Flintshire	66	69	69	59-69
Gwynedd	69	59	62	59-62
Isle of Anglesey	35	39	39	31-39
Merthyr Tydfil	30	32	32	30-32
Monmouthshire	46	48	48	41-48
Neath Port Talbot	60	64	64	54-64
Newport	51	57	56	45-57
Pembrokeshire	60	64	64	54-64
Powys	68	67	67	61-67
Rhondda Cynon Taf	75	91	75	66-75
Swansea	75	88	75	66-75
Torfaen	40	41	41	36-41
Vale of Glamorgan	54	59	59	49-59
Wrexham	56	64	62	49-64

### Appendix 3

## Technical Note: Requirements for each principal council for the provision of statistical data to the Democracy Boundary Commission Cymru.

### Introduction and History

- 1 In order to conduct an electoral review of a principal council area it is necessary for the Commission to have the requisite statistical information upon which it can make decisions, including as to the number of councillors in a Council and the number of electors in each electoral ward.
- 2 At the start of an electoral review the Commission requests from the Electoral Registration Officer (ERO) of the council for the area under review the latest electoral figures for each community area and ward (where a community is warded). A 5-year projection of the number of electors is also requested on the same basis.
- 3 In respect of the existing figures, these have not always been provided in a consistent format and, on a number of occasions, this has required the Commission to go back to the ERO for clarification of the figures. The inconsistencies have taken a number of forms such as electorate broken down by polling district rather than community/community ward, missing data, incorrect totals, etc. The clarification and correction of this data has taken time and effort to resolve and, on occasion, this has had an impact on the timely running of a review.
- 4 In respect of projected figures, the Commission has in the past received projections based on a number of different methodologies, ranging from blanket increases by percentile, to carefully thought-out determination by reference to attainers, deaths and development proposals. On some occasions the Commission has been told that it is not possible to provide such statistics, and in such circumstances the Commission has no alternative but to use the existing electorates when proposing electoral arrangements and is then unable to gauge the future suitability of those arrangements. Again, the difficulties in obtaining these statistics have, on occasion, had an impact on the timely running of a review.
- 5 In order to avoid problems which the Commission has previously encountered in respect of electoral statistics, the Commission has created this Technical Note. This is intended to assist the ERO's of each principal council to understand the precise requirements of the Commission with regard to the electoral data it will be requesting before the start of a review.

### Requirements

- 6 The Commission requires 2 different sets of data from the ERO of each principal council:
  - i. Data as to existing arrangements; and
  - ii. A 5 year projection.

### Existing Arrangements

- 7 The Commission requires the most up-to-date number of registered local government electors in each **community and community ward** (where a community is warded) in the principal council area. These areas are the primary building blocks which the Commission will use when creating electoral wards. Numbers of electors by postcode, polling district or electoral ward are **not** acceptable alternatives.

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- 8 The information should be provided in the pro forma provided to the council at the beginning of the review. Different councils will have different officers responsible for compiling these figures and the Council itself should identify who in the council is best placed to provide this information.
- 9 The Commission also asks that the full register of elector data, from which the information is derived, is retained at the principal council (saved).

### **A Five-Year Projection**

- 10 The Commission requires a carefully considered and, so far as is possible, accurate projection of the number of electors in each existing **community and community ward** (where a community is warded) in the principal council area in the year that is five years after the register that is being used for the review. These projected figures should also be submitted in the pro forma provided to the council at the beginning of the review.
- 11 It is up to the council under review to determine a precise methodology for producing these forecasts, and the Commission recognises that this is not an exact science. However projected figures should be calculated using determination of attainers, deaths, development proposals and trends of population shift. It is unacceptable to merely provide projected population figures or blanket increases across the principal council's area. Where it is difficult to calculate a forecast figure at the community ward level, the Council should seek to make the best forecast possible, making pro rata forecasts only where absolutely necessary.
- 12 In addition to providing the forecast data, the Commission expects each council to explain clearly how the projected figures have been calculated.
- 13 Whilst the Commission recognises that it is not straightforward to provide a completely accurate projection in every case a significant effort should be made by the Councils to attain the best possible evidence-based projection.

