

Democracy and Boundary Commission Cymru

2025 – Electoral Review Programme

Council Size Policy

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Introduction

1. This guidance is indented to assist interested parties in preparing their submission on council size to the Democracy and Boundary Commission Cymru ('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.
2. The starting point for every review is to decide the appropriate number of councillors for the local authority. While the final decision on council size rests with the Commission, its approach has always been one of dialogue with each council that it reviews. The Commission's view is that a 'good' review is 1 where the local authority actively engages with the process. Ideally, the Commission's decision will be informed by locally generated proposals and underpinned by sound evidence and reasoning.

What is Council Size?

3. The Democracy and Boundary Commission Cymru etc. Act 2013 gives the Commission the power to review the electoral arrangements of principal councils in Wales.
4. The legislation does not set out how many members (or councillors) each authority (or type of authority) will have. It is the Commission's responsibility to determine the appropriate number of councillors for each authority.
5. 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 to provide for effective community leadership and representation.

General Principles

6. The Commission recognises that there is considerable variation in council size across Wales, not only between different types of local authority – County, County Borough, City or City and County – but also between authorities of the same type.
7. 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, which are appropriate for the particular local authority. The Commission believes that changes to the number of councillors should be limited to 10% from the existing number of councillors in order to minimise disruption to the councils functions.
8. The way in which local authorities conduct their business and provide for the effective representation of their electorate has changed considerably over recent decades. The implementation of the Local Government Act 2000 ('the 2000 Act') saw most local authorities change how they made decisions and operate. Similarly, subsequent legislation, including the Local Government and Public Involvement in Health Act 2007 and the Localism Act 2011, introduced further opportunities for local government to

modify governance and management arrangements. In addition, partnership working, developments in service delivery, and digital working have also impacted on local authorities.

9. An electoral review provides the opportunity for respondents to think carefully about current arrangements in the context of modern governance and service delivery needs; and what these mean for the future in terms of the number of elected members.
10. 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.
11. The Commission does not recommend that any submissions made on council size need to be particularly long. However, submissions should be made on the Commission's Council Size Submission Template and demonstrate careful thinking about the issues. Electoral reviews take place every 10 years and the Commission wants local authorities to take the opportunity to ask themselves questions about the important roles of councillors in providing leadership, securing accountability and offering community leadership.
12. The Commission seeks to understand elected member requirements across 3 aspects:
 - **Strategic Leadership** – how many councillors are needed to give strategic leadership and direction to the authority?
 - **Accountability**
 - *Scrutiny* – how many councillors are needed to provide scrutiny to the authority?
 - *Regulatory* – how many councillors are needed to meet the regulatory requirements of the authority?
 - *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.
13. In every review, the Commission will make recommendations that will remain appropriate for the medium to longer term, i.e. to recommend a council size that delivers effective and convenient local government well after the completion of the electoral review. Accordingly, respondents should set out their longer-term vision for operation of the local authority.

Approach

14. Since the last round of electoral reviews, the Commission has commissioned independent research into the variable factors that have an impact on the workload of county councillors across Wales. The findings of the research can be found in the report available on the [Commissions website](#).
15. The Commission must construct electoral arrangements that reflect local circumstances, and in doing so will neither apply any strict mathematical criteria nor impose a formula for the national determination of council size. However, the Commission has set out a council size allocation as a recommendation for the number of councillors required to achieve an effective and convenient set of electoral arrangements these allocations have been modelled on, population, population sparsity and deprivation, more information on the modelling can be found in Appendix 1. It is recommended that submissions to this consultation clearly demonstrate the characteristics and needs of each local authority, and its communities, and how such factors have informed both the proposed and alternative council sizes considered.
16. 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 with 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 75 councillors in size.
17. The Commission's decision about an authority's council size will mark the formal start to the review process. However, the Commission's decision on council size will not be formalised until the Final Recommendations are agreed and published. This is because the number of councillors may change marginally from the initial decision if it is felt that modifying the number of councillors may provide for a pattern of electoral wards that better reflects the statutory criteria.
18. The Final Recommendations describe the complete set of electoral arrangements, including ward names as well as the number of elected members, alongside community warding arrangements. These recommendations will be submitted to Welsh Government who if it thinks fit, will give effect to these recommendations either as submitted, or with modifications. The changes would then come into force at the next local government election by means of a Welsh Government Order.

Multiple Submissions and Balancing the Evidence

19. Political (or other) groups may present their own submissions to the Commission either alongside or as an alternative to the council's formal submission. It is recommended that all submissions are underpinned by sound evidence and reasoning whether they propose to reduce, retain or increase councillor numbers.
20. All submissions will be considered equally, and decisions will be made based on the strength of evidence put forward.
21. Where the Commission receives multiple finely balanced proposals, or a single poorly evidenced case, it may request further information from the respondents. If further information is not forthcoming, the Commission reserves the right to put forward its own number based on its own experience and judgement.

Making a Submission

22. All submissions made to the Commission should follow the 'Council Size Submission' template. This template presents a broad set of issues for respondents to consider; however, the Commission does not require lengthy responses to every section. The Commission recommends that respondents use the opportunity to consider not just how the council works now but how it is likely to work in the future. Submissions will explain the reasoning that underpins and explains the proposed council size as well as describing the necessary arrangements.
23. The submission will focus on 3 aspects of councillor roles: Strategic Leadership, Accountability and Community Leadership. However, the Commission will consider any further relevant issues raised outside of these topics.

Appendix 1

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 been 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.

Authority	Population (2023 ONS MYE)	Current Councillors
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
Wales	3,164,404	1,233

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.

Authority	Population	Pop over min	Additional Pop Cllrs
Blaenau Gwent	67,356	8,763	2
Bridgend	146,743	88,150	21
Caerphilly	176,437	117,844	28
Cardiff	383,536	324,943	
Carmarthenshire	190,083	131,490	31
Ceredigion	73,050	14,457	3
Conwy	114,410	55,817	13
Denbighshire	97,156	38,563	9
Flintshire	155,812	97,219	23
Gwynedd	119,173	60,580	14
Isle of Anglesey	69,291	10,698	3
Merthyr Tydfil	58,593	-	-
Monmouthshire	94,572	35,979	9
Neath Port Talbot	142,898	84,305	20
Newport	163,628	105,035	25
Pembrokeshire	125,006	66,413	16
Powys	134,439	75,846	18
Rhondda Cynon Taf	241,178	182,585	44
Swansea	246,742	188,149	45
Torfaen	93,419	34,826	8
Vale of Glamorgan	134,733	76,140	18
Wrexham	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%
Cardiff	383,536	141	2721.77	
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%

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).

Authority	Pop Cllrs	Sparsity Cllrs
Blaenau Gwent	2	1
Bridgend	21	7
Caerphilly	28	7
Cardiff		
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.

Authority	% LSOAs in Most Deprived 20% (WIMD 2019)	Additional Cllrs for Deprivation
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

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.

Authority	% population in BUA's < 10K (ONS 2001)	Additional Rural Cllrs
Blaenau Gwent	34	0
Bridgend	23	0
Caerphilly	59	1
Cardiff	3	
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	Total
Blaenau Gwent	30	2	1	1	0	34
Bridgend	30	21	7	0	0	58
Caerphilly	30	28	7	1	1	67
Cardiff	30					
Carmarthenshire	30	31	28	0	1	90
Ceredigion	30	3	3	0	2	38
Conwy	30	13	11	0	1	55
Denbighshire	30	9	8	1	1	49
Flintshire	30	23	14	0	1	68
Gwynedd	30	14	13	0	2	59
Isle of Anglesey	30	3	3	0	2	38
Merthyr Tydfil	30	-	0	2	0	32
Monmouthshire	30	9	8	0	1	48
Neath Port Talbot	30	20	12	1	0	63
Newport	30	25	0	2	0	57
Pembrokeshire	30	16	15	0	2	63
Powys	30	18	17	0	2	67
Rhondda Cynon Taf	30	44	15	1	0	90
Swansea	30	45	11	1	0	87
Torfaen	30	8	1	0	0	39
Vale of Glamorgan	30	18	10	0	0	58
Wrexham	30	19	13	0	1	63

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.

Authority	Existing Councillors	Allocation	Allocation with Cap	Range
Blaenau Gwent	33	34	34	30-34
Bridgend	51	58	58	46-58
Caerphilly	69	67	67	62-67
Cardiff	79			78-79
Carmarthenshire	75	90	75	67-75
Ceredigion	38	38	38	34-38
Conwy	55	55	55	49-55
Denbighshire	48	49	49	43-49
Flintshire	66	68	68	59-68
Gwynedd	69	59	59	59-62
Isle of Anglesey	35	38	38	31-38
Merthyr Tydfil	30	32	32	30-32
Monmouthshire	46	48	48	41-48
Neath Port Talbot	60	63	63	54-63
Newport	51	57	57	45-57
Pembrokeshire	60	63	63	54-63
Powys	68	67	67	61-67
Rhondda Cynon Taf	75	90	75	66-75
Swansea	75	87	75	66-75
Torfaen	40	39	39	36-39
Vale of Glamorgan	54	58	58	49-58
Wrexham	56	63	63	49-63