



**Appendix A**

# **Community Governance Review**

## **Final Recommendations**

### **February 2024**

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**Battisford and Combs**

We are committed to the principles of fairness and respect at  
Babergh and Mid Suffolk District Councils

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# 1. The Review

## 1.1. When to undertake a Community Governance Review

Under the Local Government and Public Involvement in Health Act 2007, District Councils have a responsibility to undertake Community Governance Reviews.

### The Council

- has a duty to conduct a district-wide review every 10-15 years.
- must respond to a request e.g. from a Parish Council
- must be undertaken in response to a Community Governance Application from a “neighbourhood forum”.
- must be undertaken in response to a valid Community Governance Petition.

## 1.2. Community Governance Review Requirements

Petition Area	Required Signatories
< 500 electors	At least 37.5% of the electors
500 - 2,499 electors	At least 187 electors
> 2,500 electors	At least 7.5% of the electors

## 1.3. The purpose of a review

The purpose of reviewing community governance arrangements is to ensure they continue to reflect the identity and interests of local communities and are as effective and convenient as possible.

## 1.4. The Scope of a review

Community Governance Reviews can cover the whole structure of the parishes in a local authority, or have a narrower focus, for example, councillor numbers in a particular parish. They can recommend creating new parishes, amend existing

parishes, name them, establish parish councils, and make electoral arrangements. They can also make recommendations about grouping or de-grouping parishes.

### 1.5. Authority within a review

The Council can decide whether to give effect to recommendations made in these reviews save that any consequential recommendations for related alterations to the electoral areas that require approval of, and implementation by, the Local Government Boundary Commission for England (LGBCE).

### 1.6. The Current Review

Mid Suffolk District Council agreed to conduct this stage of the review at full council on 26 January 2023. The report and the legal basis on which the review is conducted, along with the terms of reference for this review can be found by following the below links:

- [Mid Suffolk Council CGR Report 26 January 2023](#)
- [Mid Suffolk Council CGR Report 26 October 2023](#)
- [Terms of Reference Community Governance Review 2023](#)

Or via the Community Governance Review webpage: [www.midsuffolk.gov](http://www.midsuffolk.gov)

The Council resolved that:

- That Council agree the recommendations in [Appendix A](#).
- To agree the Future Reviews detailed in [Appendix B](#).

The Council agreed to conduct a further review for Battisford and Combs, and Onehouse and Stowmarket in light of the previous insufficient timescale and requirement by the Local Government Boundary Commission for England (LGBCE) for a level of public consultation to be able to consider the changes requested.

### 1.7. Legislative obligation for public consultation

The 2007 Act requires that local people are consulted during a community governance review, that representations received in connection with the review are taken into account and that steps are taken to notify them of the outcomes of such reviews including any decisions.

Where proposals for related alterations are submitted to the Local Government Boundary Commission for England (LGBCE), it will expect to receive evidence that the Council has consulted on the public as part of a community governance review and the details of the outcome of that review.

Further guidance on Community Governance Reviews may be found at the [gov.uk](https://www.gov.uk) site.

### 1.8. Community Governance Review Summary Timeline

Timeline	Action
July 2023 to September 2023	Initial Consultation
September 2023	Considerations of responses and drafting of recommendations
November 2023 to January 2024	Further Consultation on draft recommendations
January 2024 to February 2024	Formulation of final recommendations and publication of consultation results.
20 March 2024	Final recommendations to be considered by Council with resolution to make a re-organisation order (as necessary)
As soon as practicable	Publish final recommendations and make re-organisation order as necessary

### 1.9. Consultations within the current review

The review conducted a new initial consultation, held between July and September 2023. This was held with all former stakeholders from the initial consultation, including the Parishes, Town, MP, Suffolk County Council, District Councillors, and open for any additional public responses for the period.







Council met on 26<sup>th</sup> October 2023 and agreed for the further consultation to take place based upon the draft recommendations of the Working Group. The further consultation was initially to run from November 10<sup>th</sup> until 22<sup>nd</sup> December, but this was extended to 10<sup>th</sup> January due to unforeseen delays with the print service which was not able to dispatch the last of the information packs until 15<sup>th</sup> November.

In regard to national legislation, the Council is under no obligation to provide printed copies to residences, however, this method of engagement was chosen and supported by full Council to encourage a high level of response.

The final turnout of the Battsford and Combs further consultation was 140 responses. This accounts for 21.98% of all households within the two areas concerned within this Community Governance Review.

### 1.10. Consultation turnouts

To understand the turnout figures received during the further consultation period regard was paid to previous Community Governance Reviews in other Council areas. The list is not exhaustive and does not exclude the possibility of other Community Governance Reviews past or future exceeding figures shown within the table below. However, it can be noted that Community Governance Reviews do not typically receive a high level of engagement. Additionally, Community Governance Reviews will yield a higher turnout when the areas in question are smaller parishes, rather than larger Towns.

Council	Links	Household number	Response	Rate	Comments
 Dorset Council	<a href="#">Dorset Council for Bridport Town Council</a>	~6360	151	<b>2.37%</b>	Overwhelming, Significant, Exception level of support
 MID SUSSEX DISTRICT COUNCIL	<a href="#">Mid Sussex for Burgess Hill Town</a>	12300	89	<b>0.72%</b>	Appreciable number
 NORTH YORKSHIRE COUNCIL	<a href="#">North Yorkshire for Scarborough</a>	8913	538	<b>6%</b>	-
	<a href="#">North Yorkshire for Eastfield</a>	3,126	151	<b>4.83%</b>	-
 Mid Suffolk DISTRICT	Mid Suffolk District Council for Battsford and Combs	596	140	<b>21.98%</b>	-
 Chelmsford City Council	<a href="#">Chelmsford City Council for Chelmsford Community Gardens</a>	~10,000	262	<b>2.62%</b>	-
 West Suffolk Council	<a href="#">West Suffolk District Council District Wide</a>	~180000	106	<b>0.06%</b>	-

The Working Group is satisfied with the level of consultations received within the consultation period to support the recommendations set out on October 26<sup>th</sup>, 2023. Turnout also lends secondary reasoning to send physical copies out based on the draft recommendations, as evidence suggests that residents respond better to questions revolving around intended action.

### 1.11. The Draft Recommendations

Name of Parish/Town Council	Number of Members	Number of Electors	Recommendations/ Reasons for Recommendation
<b>Battsford Parish Council</b>	474	7	1. Proposed inclusion of Bowl Meadow Development currently in Comb Parish Council area to be included within the Battsford Parish area.
<b>Combs Parish Council</b>	614	7	2. Dwellings along Bildeston Road to be re-allocated from the Combs Parish Council area.
Draft Recommendations:			
1. Council is asked to agree that the boundary between Combs Parish Council and Battsford Parish Council is amended as indicated on the attached Plan to include the Bowl Meadow Development.			
2. Council is asked to agree that the Bildeston Road remain as part of Combs Parish Council - No change.			
Reasons for Recommendation:			
1. Local preference (the proposal was supported by Battsford PC and not opposed by Comb PC on the basis that it made logical sense but that the electors should decide.			
2. The Bildeston Road dwellings are long standing existing dwellings which already identify with Combs Parish Council.			

The review afforded residents three opportunities to have their say on the boundary review. The stage 1 consultation was sent to all legislative stakeholders and a [public notice](#) was placed on the BMSDC noticeboard as well as on the Council website for any public response, and for any entity to diffuse and encourage participation. A new stage 1 was conducted in the part two review, followed by a stage 2 further consultation which featured physical information packs sent out to all affected households, as well as placed on the website for access and emailed to all legislative stakeholders.

Whilst both stage one consultations as well as a site visit formed the basis for the draft recommendations, the outcome and reliability of the stage 2 further consultation was taken into account by the Working Group to constitute the final recommendations to Council.

### 1.12. Submissions/Comments

During the stage 1 consultation of the current review for Battisford and Combs:

Battisford Parish Council - Clerk

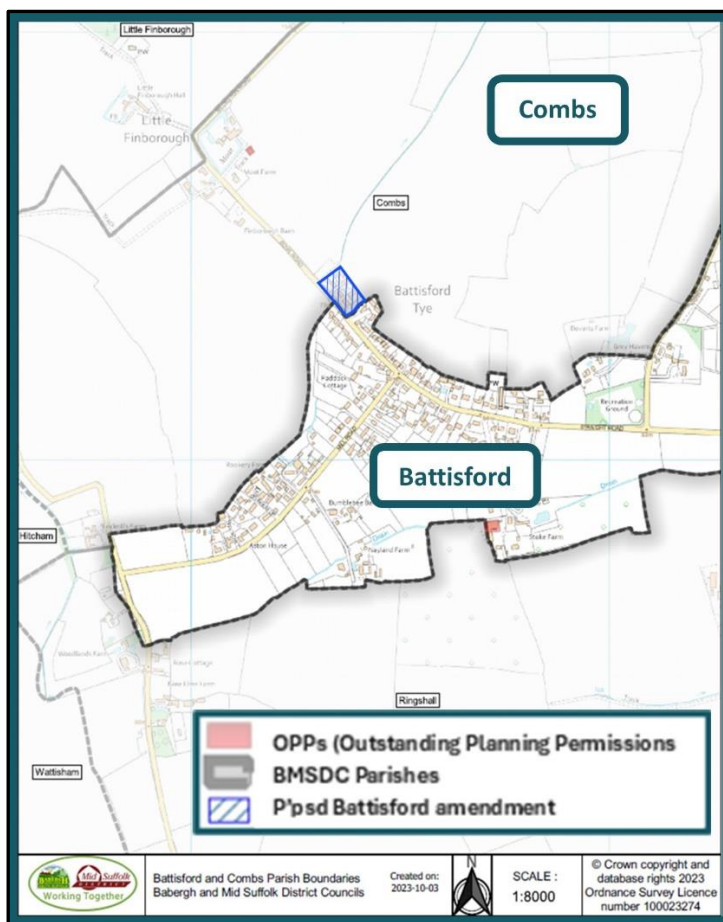
Combs Parish Council - Clerk

## 2. Current Arrangements and History of the area

### 2.1. Current arrangements

The images below show the map used during the review, an ordinance survey map with the hatched lettered areas displaying the areas of interest within the review. The black dotted line highlights the existing parish/town boundary. To the north is the Parish of Combs and to the south is the Parish of Battisford. This map was provided to all households with their information pack at the beginning of the further consultation.





Map 1. Ordinance Survey

Parish	Electorate (Oct 2023)	Households (Nov 2023)	Councillors
Battisford	474	254	7
Combs	614	342	7
<b>Totals:</b>	<b>1088</b>	<b>596</b>	<b>14</b>

### 2.2. Relevant history

The Bowl Meadow development is a new residential area; therefore, no historical elements are present. However, it has been raised that traditional access to the Punch Bowl Inn is through the bowl meadow development.

## 3. Assessment of Submissions

A summary of the further consultation report is noted within this report, whilst the full report can be found in the accompanying appendices and on the [Community Governance Review website](#).

### Recommendation 1

- It was found that 88.57% (124) of respondents were in favour of recommendation 1 the draft to move the Bowl Meadow development in Battisford. 70 of these respondents qualified their response as logical sense, and 49 of these respondents' cited proximity.
- It was found that 5.71% (8) of respondents were in favour maintaining the current boundaries.

### Recommendation 2

- It was found that 46.43% (65) of respondents were in favour of recommendation 2 to keep Bildeston Road in Combs; no change.
- It was found that 45.71% of respondents left the response blank for recommendation 2, either because this issue was not as prominent or pertinent to respondents as the first question.
- IT was found 5.00% (7) of respondents thought that Bildeston Road should be moved into either Little Finborough or Battisford.

### Overall

- It was found that 7.86% (11) of respondents declared a disability, showing a fair level of representation was achieved within the consultation.
- It was found that 0% (0) of respondents' answers did not match their explanations, displaying a confident level of understanding of those who partook in the exercise.
- It was found that 3.57% (5) of respondents noted a lack of information. This was reasoned to be around the pro's, cons, and council tax elements. The scope of which falls outside the legal considerations for Community Governance Review as facilitator and could have been interpreted as creating bias. The responsibility of such information therefore falls to the Parishes to conduct their own campaign around the matter, in a similar vein to a Neighbourhood Planning Referendum (NPR).

A list of anonymised responses can be found within the [Consultation Responses report](#).

## 4. Statutory Criteria

4.1. The legal tests of a Community Governance Review:

- To reflect the identities and interests of the community in that area
- To provide effective and convenient local government – ‘viability in the provision of services’
- To take into account other arrangements for community representation/engagement

4.2. There are no statutory periods for consultation, however the Local Government Association recommends a 6-to-12-week period for a consultation exercise, and the Association of Electoral Administrators supports councils following usual timescales for other consultations.

- [LGA on consulting residents](#)
- [Guidance on community governance reviews \(lgbce.org.uk\)](#)
- [Local Government and Public Involvement in Health Act 2007 \(legislation.gov.uk\)](#)

4.3. There is no statutory obligation to write out to households in the duration of a consultation, the Local Government and Public Involvement in Health Act 93 (2) states “*subject to those duties, it is for the principal council to decide how to undertake the review.*” However, it was agreed by the Working Group and Council as best practice to encourage higher levels of engagement.

## 5. Final Assessment and Final Recommendations

### 5.1. Assessment

The Community Governance Review process has provided several insights into the Battsford and Combs boundary matter, these have been taken into consideration the agreement of the Working Group’s final recommendations.

- Initial assessment from consultation 1
- Site visit
- History and the prior community governance review
- Further consultation report

## 5.2. The Final Recommendations

### Purpose of the Review:

The recommendations are guided by the overarching purpose of community governance reviews, which is to ensure that governance arrangements reflect the identity and interests of local communities. By maintaining consistency with the draft recommendations, the final proposals aim to uphold this fundamental objective and promote effective and convenient local government.

### Stakeholder Engagement and Consultation:

The recommendations are informed by extensive stakeholder engagement and consultation processes conducted throughout the review period. Input from various stakeholders, including Parish Councils, Town Councils, County Councillors, District Councillors, and members of the public, has been carefully considered in formulating the recommendations. The high level of engagement and responses received during the consultation phases provides robust evidence supporting the continuity between draft and final recommendations.

### Historical Context and Prior Reviews:

The recommendations take into account the historical context and surrounding areas. Insights gleaned from prior reviews, including stakeholder preferences and community identity considerations, have been factored into the decision-making process, contributing to the consistency between draft and final recommendations.

### Evidence-based decision-making:

The recommendations are grounded in a thorough assessment of submissions, consultations, and statutory criteria governing community governance reviews. Detailed analysis of consultation turnouts, public responses, and relevant statutory obligations has informed the formulation of the recommendations, ensuring that they are evidence-based and aligned with the principles of good governance.

After careful review and consideration, it is affirmed that the final recommendations presented herein align closely with the draft recommendations previously circulated. Through detailed evaluation and stakeholder input, it has been determined that the initial proposals aptly address the identified needs and objectives outlined in the community governance review process. As such, the final recommendations reflect a

reaffirmation of the strategic direction established in the draft stage, underscoring continuity and coherence in the proposed course of action.

Final Recommendations:

- 1. Council is asked to agree that the boundary between Combs Parish Council and Battisford Parish Council is amended as indicated on the attached Plan (Appendix E) to include the Bowl Meadow Development.**
- 2. Council is asked to agree that the Bildeston Road remain as part of Combs Parish Council - No change.**

Reasons:

1. Local preference (the proposal was supported by Battisford PC and not opposed by Comb PC on the basis that it made logical sense but that the electors should decide.
2. The Bildeston Road dwellings are long standing existing dwellings which already identify with Combs Parish Council.
3. The further consultation responses have demonstrated significant support from both communities towards the initial proposals of the Working Group recommendations.

## 6. Consequential Matters & Next Steps

- 6.1. Consequential matters, refer to financial matters, the transfer of assets, electoral matters, and the legislative action required from the LGBCE to be able to enact boundary changes.
- 6.2. Due to the recent boundary changes made by the parliamentary and LGBCE, any order would not take effect until 1 April 2027 for financial and administrative purposes, and 6 May 2027 for electoral matters owing to the next parish cycle.

### 6.3. Assets and Precept

- 6.3.1. As Parishes and Town councils do not receive any money from central government, they are reliant on income raised from the precept.
- 6.3.2. In the context of this CGR, Combs Parish Council does not have any assets that would as a consequence of the boundary move be required to be transferred to Battisford Parish Council.

6.3.3. In the event of a boundary move, the precept of the Bowl Meadow development would be aligned to Battisford. The current annual precepts for the average D band property are:

- Battisford: £52.13
- Combs: £28.46

#### 6.4. Local Government Boundary Commission for England (LGBCE)

6.4.1. The Principal Authority must keep the LGBCE informed of any changes to the electoral arrangements within its area to ensure other reviews within the area take the arrangements into consideration.

6.4.2. With the conclusion of the Parliamentary boundary review 2023, it has been noted that the two areas of Battisford and Combs now fall into different constituencies; Combs falls into the Bury St Edmunds and Stowmarket constituency, whilst Battisford falls into the Central Suffolk and North Ipswich constituency. A boundary move would therefore require the creation of a separate polling district for Bowl Meadow, to align electors in all other elections which the LGBCE can amend; district, county, and parish. The LGBCE cannot however change the parliamentary boundary and therefore residents of Bowl Meadow will vote in the Bury St Edmunds and Stowmarket constituency until the next parliamentary boundary review.

#### 6.5. Electoral Matters

6.5.1. Changes to the boundary would only take effect from the local elections in May 2027.

#### 6.6. Consequential Matters

As the recommendation is to move the boundary, consequential matters subject to Council approval are as below:

- That the Monitoring Officer be authorised to make the above changes effective from 1st April 2027, for administrative purposes, and from 6th May 2027 for electoral purposes.
- To make a Mid Suffolk District Council (Reorganisation of Community Governance) (Battisford) Order 2024.

## 7. Contact Details

W: <https://www.midsuffolk.gov.uk/community-governance-review>

E: [cgr@baberghmidsuffolk.gov.uk](mailto:cgr@baberghmidsuffolk.gov.uk)

Community Governance

Babergh and Mid Suffolk District Councils

Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

## 8. Legal Advice

Due to the unique nature of the Community Governance Review, legal guidance was sought to ensure that the Council conforms to all legislative requirements. For transparency, the following is a summary of the advice provided:

8.1. The 12-month framework for a Community Governance Review only applies to petition or application. Therefore, does not apply to district-wide reviews.

*(Section 93(8) of the Local Government and Public Involvement in Health Act 2007 with 2015 amendment.)*

8.2. The Council has full scope in the conduct of the consultation.

*(Section 93(2) of the Local Government and Public Involvement in Health Act 2007)*

8.3. The questionnaire provided was intelligible, with room for improvement.

*(In consideration to R (Better Streets for Kensington and Chelsea v The Royal Borough of Kensington and Chelsea [2023] EWHC 536 (Admin), at paras 36-47.)*

It is not a legislative obligation for the Council to disclose Council Tax changes, these fall outside the scope of Community Governance Review considerations.

*(Section 93(2) of the Local Government and Public Involvement in Health Act 2007 with 2015 amendment.)*

8.4. It is the Council that must make the final recommendation before the final comment period can commence. The Council therefore may adopt the recommendation of the Working Group or adopt its own.

*(Section 93(7) of the Local Government and Public Involvement in Health Act 2007 with 2015 amendment.)*

Overall, the advice lends credence to the conduct of the Community Governance Review and provides confidence in the undertaking of future Community Governance reviews.

## Appendix 1. Methodology

### Further Consultation Methodology

- District Councillors were pre-notified of the commencement of the further consultation period through the [monthly newsletter](#).
- The Stage 2 consultation began on November 10<sup>th</sup>, 2023, and was due to run until December 22<sup>nd</sup>, 2023. This was extended until January 10<sup>th</sup>, 2024, affording affected stakeholders 8 and half weeks to respond, either by post or email.
- The Community Governance Review webpage used for the stage 1 consultation was re-instated, and updated with further information for stage 2, alongside the executive report and the draft recommendations.
- The consultation web page contained a downloadable pdf survey allowing residents and other stakeholders to submit views on the draft recommendations via email.
- An A4 page information pack was also prepared containing the similar information to what was on the webpage, signposting to the webpage, as well as a copy of the survey in paper format and the map of the area concerned within the community governance review.
- An option was provided to request further hard copies of the questionnaire via telephone or email for those residents who preferred to complete a paper copy of the questionnaire or who did not have access to the internet.
- Surveys and maps were prepared, upon request, for any Councillors and Parish/Town Councils to assist with additional provisions.
- Posters were sent to Councillors and Parish/Town Councils to circulate and promote engagement. These featured on the district webpage.
- Prepaid envelopes were included to packs dispatched to encourage responses.
- Social media feeds were used to boost awareness of the consultation process.
- The A4 questionnaire was created printable in A3 for the visually impaired.



## Appendix 2. Questionnaire

Babergh and Mid Suffolk District Councils

# Community Governance Review - Battisford and Combs



The recommendations that we are seeking your opinions on, are:

1. To agree that the boundary between Combs Parish Council and Battisford Parish Council is amended as indicated on the attached Plan (Appendix E) to include the Bowl Meadow Development.
2. To agree that the Bildeston Road remain as part of Combs Parish Council - No change.

Please tell us your views by completing the questions below.

### Using your personal information

Any information provided in this survey will be used in the strictest confidence and only for the use of the community governance review.

For further information on how we collect, use, share, secure and retain your personal information, and your legal rights, please see our Privacy Notice at <https://www.midsuffolk.gov.uk/privacy-policy>

### Residency/Locality

#### Q1 Please state which of the following best describes you?

- I live in Battisford or Combs (please state your home postcode below)
- I work in Battisford or Combs (please state your workplace postcode below)
- I own a business in Battisford or Combs (please state your business postcode below)
- I am a representative of a community organisation in Battisford or Combs  
(Please state which one below)
- Other

Please state your postcode:

Please state community organisation:

Please state other:

## Recommendation Views

Q2 **Option 1 - Agree** the boundary between Combs Parish Council and Battsford Parish Council is amended as indicated on the attached Plan (Appendix E) to include the Bowl Meadow Development.

**Option 2 - Disagree** the boundary between Combs Parish Council and Battsford Parish Council is amended, and for boundaries to remain the same as they currently are – no change.

Option 1 (Agree) *please go to question 4*

Option 2 (Disagree) *Please go to question 5*

Some other option *Please go to question 6*

Don't know / not sure *Please go to question 7*

***Please tick only one option***

Q3 **Option 3 - Agree that Bildeston Road remain as part of Combs Parish Council - No change.**

**Option 4 - Disagree that Bildeston Road remain as part of Combs Parish Council.** The electoral arrangements of Bildeston Road would come under reconsideration by the working group.

Option 3 (Agree) *please go to question 8*

Option 4 (Disagree) *Please go to question 9*

Don't know / not sure *Please go to question 10*

***Please tick only one option***

Q4 **In reference to Q2, please tell us why you chose option 1**

Q5 **In reference to Q2, please tell us why you chose option 2**

**Q6 In reference to Q2, please provide details on other options available?**

**Q7 In reference to Q2, please tell us why you don't know or are not sure on which option you prefer?**

**Q8 In reference to Q3, please tell us why you chose option 3**

**Q9 In reference to Q3, please tell us why you chose option 4 and provide any alternative arrangement suggestions.**

**Q10 In reference to Q3, please tell us why you don't know or are not sure on which option you prefer?**

Q11 **Are there any further comments you would like to add about the Community Governance Review?**

**Contact details**

If you would like to be kept informed on the Community Governance Review and notified for comments in any future developments of the final recommendations following this further consultation, please provide your name and preferred contact details below.

Name:

Address:

Email address:

**Demographic Data**

**Age**

Which age category are you in?

- |                                  |                                  |  |
|----------------------------------|----------------------------------|--|
| <input type="checkbox"/> 16 - 19 | <input type="checkbox"/> 40 - 49 | <input type="checkbox"/> 70 - 79           |
| <input type="checkbox"/> 20 - 29 | <input type="checkbox"/> 50 - 59 | <input type="checkbox"/> 80+               |
| <input type="checkbox"/> 30 - 39 | <input type="checkbox"/> 60 - 69 | <input type="checkbox"/> Prefer not to say |

**Disability**

Do you consider yourself to be a disabled person or to have a long-term, limiting condition?

- Yes                       No                       Prefer not to say

**Thank you for taking the time to complete this survey.**

