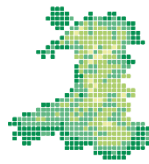



Ty Hastings  
Llys Fitzalan  
Caerdydd  
CF24 0BL



Comisiwn Ffiniau a  
Democratiaeth Leol  
Cymru  
Local Democracy and  
Boundary Commission  
For Wales

Hastings House  
Fitzalan Court  
Cardiff  
CF24 0BL

E-bost:  
ymholiadau@ffiniau.cymru  
www.cffdl.llyw.cymru

 (029) 2046 4819  
Ffacs/Fax (029) 2046 4823

Email:  
enquiries@boundaries.wales  
www.ldbc.gov.wales

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Minister for Housing and Local Government

Cardiff Bay

Cardiff

CF99 1SN

By email

30 April 2021

Your Ref : MA/JJ/1258/21

Dear Minister,

Thank you for your letter dated 17 March 2021 in relation to the Commission's Final Recommendations Reports for Cardiff, **Redacted information**.

I have provided, over the following pages accompanying this letter, the Commission's response to your request for information. The Commission's response refers to a number of Appendices which are also attached to this letter.

Yours sincerely,

Dr Debra Williams

Chair

Local Democracy and Boundary Commission for Wales  
[chair@boundaries.wales](mailto:chair@boundaries.wales)

## Cardiff, **Redacted Information** Review – Additional Information

### Background – stakeholder engagement

#### *Process leading up to the current electoral review programme*

1. In October 2011, the Commission published its *Electoral Reviews - Policy and Practice* Consultation Paper and invited views from its stakeholders. The Commission received 22 responses (See Appendix A). Following this consultation, the Commission published its *Electoral Reviews: Policy and Practice* document in March 2012. This document did not include the Commission's Council Size policy.
2. In May 2012, the Commission published its *Electoral Reviews - Council Size Policy* Consultation Paper. The paper set out the Commission's preliminary view and approach to council size determination. The Commission received 29 responses to the consultation (See Appendix B) and having taken into account the views it received, the Commission worked with the Local Government Data Unit Wales to develop a second consultation paper with updated methodology on the Council Size policy. In March 2013 the second paper was published, and another round of consultation was carried out. The Commission received 21 responses (See Appendix C).
3. Following the three rounds of consultation with its stakeholders, the Commission published its *Electoral Reviews: Policy and Practice* including the Council Size Policy in the document, in December 2013. The document set out the intended timetable for conducting the reviews of Wales' principal councils; its Council Size policy; and the policies and procedures that it would apply in the conduct of the reviews.
4. It was made clear by the Commission that in carrying out an electoral review, it would undertake two rounds of consultation – at the initial stage and following the publication of draft proposals – as required by section 35 of Local Government (Democracy) (Wales) Act 2013 ("**the 2013 Act**").
5. On 20 January 2014 the Commission on Public Service Governance and Delivery reported to the First Minister recommending changes to the make-up and operation of Wales' 22 principal councils. In order to avoid any nugatory work the Commission suspended its electoral review programme to enable the necessary work to take place in relation to the proposed local government reorganisation.
6. Following a change in the Welsh Government's approach to local government reorganisation, the Cabinet Secretary for Finance and Local Government published a Written Statement on 23 June 2016 asking the Commission to restart its 10 year programme with a new prioritised timetable, with an expectation that all 22 electoral reviews be completed in time for the new arrangements to be put into place for the 2022 local government elections.

7. In July 2016, the Commission published an updated Policy and Practice document entitled *Electoral Reviews - Policy and Practice 2016* (“**the 2016 Policy**”), and began its Electoral Review Programme 2017 (“**ERP 2017**”) for all 22 principal council areas in Wales.

#### *Legislative provisions governing the ERP 2017 process*

8. The 2013 Act governs the process the Commission must follow when conducting a review of the electoral arrangements for a “principal area” under section 29 (“**a Section 29 Review**”). In broad summary:
  - a. before starting a Section 29 Review, the Commission must bring the review to the attention of the mandatory consultees and any other person it considers likely to be interested in the review (s. 34(1)(a));
  - b. after starting, as a first step, the Commission is required to “consult the mandatory consultees and such other persons as it considers appropriate” and “conduct such investigations as it considers appropriate” (s. 35(1));
  - c. thereafter the Commission must publish a draft proposal report containing any proposals for change that the Commission considers appropriate, and invite representations in relation to those proposals (s. 35(2), (3));
  - d. subsequently the Commission must consider any representations received, and publish a final report containing its recommendations (s.36).
9. For these purposes, the “mandatory consultees” are defined by section 34(3) as:
  - a. any local authority affected by the review;
  - b. the police and crime commissioner for any police area which may be affected by the review;
  - c. any organisation representing the staff employed by local authorities which has asked to be consulted; and
  - d. such other persons as may be specified by an order made by the Welsh Ministers.

#### *The Commission’s approach*

10. The 2016 Policy sets out the Commission’s approach to conducting a Section 29 Review. The following paragraphs summarise the steps that the Commission takes, in accordance with the 2016 Policy.

#### *Prior to commencing a Section 29 review*

11. In advance of starting a review, Commission officials meet with officers of the principal council under review. At this meeting, the Commission describes the

general practices and procedures of the review. Commission officials discuss what the expectations of the Commission are for the review, how consultation is undertaken and the expectations on the council to support the review, in terms of providing information, making proposals and in relation to publicising the review. Prior to the meeting the Commission requests specific data including five year forecasts of the electorate. These meetings are usually attended by the council's Chief Executive Officer, the Electoral Services Officer and a legal services representative.

12. Following the officials' meeting, officials of the Commission and the designated Lead Commissioner meet with the principal council's Chief Executive Officer and Group Leaders. The Commission sets out its expectations for the review, the appropriate number of elected members for the council under review and emphasises the importance of receiving locally generated proposals for the area and will also set out its timetable and consultation procedures.
13. At around the same time, the Lead Commissioner and Commission officials present to full council with similar information, emphasising the need for quality representations to help inform the Commission's decisions.
14. Representatives of community and town councils also receive a similar face to face briefing with an emphasis on the role of communities as part of the electoral review. These meetings are arranged by the principal council and at these briefings the Commission explains the kind of information that is helpful to the Commission when developing draft proposals to consult on.
15. The Commission considers that these meetings have been key in facilitating reviews which generate the greatest amount of participation from individuals and groups. An example copy of the Blaenau Gwent electoral review script and presentation that the Commission uses for pre-review meetings has been included in this reply (See Appendix D and Appendix E).
16. At the meetings and presentations, a Question and Answer session forms part of the briefing and all attendees are provided with a copy of the 2016 Policy. Attendees are also informed of the key contacts for the review including the Lead Commissioner and Review Officer and are told that they can contact them directly.
17. Key issues covered in the meetings and presentations include the matters that are considered during an electoral review. Typically, 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 equality (parity);
  - community tie arguments that may seek to justify atypical levels of electoral equality;
  - topography of the land, hills and rivers creating natural boundaries and motorways/railways forming man-made boundaries;

- issues relating to rurality and urbanisation;
- community area and community ward (where community areas are warded) boundaries being used as primary building blocks; and,
- single versus multi-member electoral wards.

18. The Commission also makes clear in the 2016 Policy that in producing a scheme of electoral arrangements, the Commission must have regard to a number of issues referred to in the 2013 Act. It is not always possible to resolve all of these, sometimes conflicting, issues. The Commission has placed emphasis on achieving improvements in electoral parity whilst maintaining community ties wherever possible and recognises that the creation of electoral wards which depart from the pattern which now exists would inevitably bring some disruption to existing ties between communities and that the Commission will make every effort to ensure that the revised electoral wards do reflect logical combinations of existing communities and community wards.

19. Within the meetings and presentations, the Commission also highlights that key services that are provided on a postcode basis e.g. school catchment and access to health services is not affected by the review. The Commission also informs attendees that proposals can change between the Draft and Final stages depending on the representations received.

*Following commencement of a Section 29 Review*

20. At the official start of a review the Commission writes to the principal council under review, all the town and community councils in the area, the Members of Parliament and Members of the Senedd for the local constituencies and other interested parties to inform them of the review and to request their preliminary views. Appendix F contains a pro-forma letter that the Commission uses for this purpose. Recipients of the letter are also informed of the start and end dates of the initial consultation period. For the ERP2017, the Commission has taken a uniform approach of 12-weeks for all 22 electoral reviews. The Commission also issues press releases about the review and provides publicity material that it requests 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 (See Appendix G).

21. Following the initial period of consultation, the Commission considers all the representations it receives and will develop and publish draft proposals for consultation. It is the Commission's standard practice that the draft proposals consultation period lasts for 12 weeks. The Commission writes 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 to inform them of the draft proposals, to request their views. Appendix H contains a pro-forma letter that the Commission uses for this purpose. The Commission also issues press releases about the proposals. The Commission also provides publicity material that it requests 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. (See the pro-forma at Appendix I). A briefing is also held with the officials and Group Leaders of the council.

22. Following the draft proposals period of consultation, the Commission considers all the representations it has received and publishes Final Recommendations, which it submits to Welsh Government. The Commission writes 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 to inform them of its submission of recommendations to Welsh Government (See the example at Appendix J). The Commission also issues press releases about the recommendations and provides 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 (See Appendix K). Immediately before publication, the Commission also provides an advance briefing under embargo to the Chief Executive of the council to provide an overview and explain the rationale for reaching its recommendations.
23. At the Draft Proposals and Final Recommendations stages, copies of the reports are also distributed to a wide range of stakeholders (See Appendix L).
24. All the steps set out in paragraphs 11 to 23 above have been applied consistently across all 22 electoral reviews that the Commission has conducted as part of the ERP 2017.
25. An electoral review involves the discharge of the Commission's statutory duties, the application of powers given to the Commission, and the exercise of judgement which the legislation calls for. The Commission exercises a collective judgment in generating proposals and recommendations in its reviews, and the consideration given to the issues and the reasoning adopted is explained in the Commission's reports.

### **Cardiff Review – in respect of the Old St Mellons, Llanrumney and Pontprennau areas.**

- **The population statistics and projections used during the development of the recommendations, whether they were (at the time they were used) the most recent figures and any other population statistics and projections available at the time the recommendations were developed. Information to explain how these projections and statistics were used in formulating the recommendations.**
26. The Commission used *population* statistics in developing its Council Size Policy. For electoral reviews, as set out in Section 30 of the Act, the Commission uses existing

and projected *electorate* figures as well as the number of persons that are eligible to vote but are not on the register.

27. Under the Commission's model, Cardiff is a category 1 council and currently has the maximum number of councillors (75) based on the Commission's Council Size policy. However, in light of the Commission's methodology and the representations received in the course of the Commission's Cardiff review, the Commission could not achieve the appropriate improvements in parity within the maxima set out in its policy. In its Final Recommendations Report in relation to Cardiff ("**the Cardiff Final Report**"), the Commission considered that in the interests of effective and convenient local government, a council size of 79 would be appropriate to represent Cardiff. This represents an increase of four from the existing arrangements and an increase of two from the position set out in the Commission's draft proposals for Cardiff ("**the Cardiff DPR**").
28. As part of the Commission's pre-review process as described in paragraphs 11 to 19 above, the Commission requested that Cardiff Council provide:
- a) Up to date electoral statistics of the number of Local Government electors in each Community and Community ward (where applicable). The Commission also requested that the full register from which the data is derived from be saved by the Council so the Commission can use the same figures if boundary changes need to be formulated.
  - b) The number of Local Government electors in each Community and Community ward projected five years into the future.
29. In order to assist the Council in providing the data, the Commission attached a technical advice note to the request (Appendix M).
30. For the electoral review, Cardiff Council provided 2019 electorate data as well as projected data for 2024. An account produced by Cardiff Council explaining how it formulated its projected figures has been included with this response as Appendix N.
31. The data provided by Cardiff Council was the only data as to the current and projected electorates within the Cardiff Council area that was available to the Commission and used by the Commission in its Cardiff review.
32. This data was used by the Commission to create a spreadsheet (Appendix O) and map (Appendix P) to indicate the electoral variances of wards within the Cardiff Council area and identify the areas which were likely to need to be changed as part of the electoral review.
33. Based on the existing electoral arrangements of 75 members and the resulting average ratio of 1 councillor to 3,243 electors across the Cardiff Council area, the data for the existing wards of Llanrumney and Pontprennau/Old St Mellons ("**POSM**")

was as follows (showing the electorate figures for 2019 and 2024 provided by Cardiff Council):

Name of electoral ward	Description	No. of Councillors	Electorate (2019)	% Variance	Electorate (2024)	% Variance
Llanrumney	Community of Llanrumney	3	7,694	-21%	7,575	-28%
Pontprennau	Communities of Pontprennau and Old St. Mellons	2	7,537 (Pontprennau 5,207; Old St Mellons 2,330)	16%	10,410 (Pontprennau 7,192; Old St Mellons 3,218)	48%

34. In these tables, the “variance” indicates the degree to which the number of electors per councillor in a given electoral ward is higher (where the variance is positive) or lower (where negative) than the average for the Council’s area as a whole. In general, the Commission focuses in its electoral reviews on ensuring variances in electoral wards of no more than +/- 25% (other than in exceptional circumstances), based both on current and on projected electorate figures. As is shown by the above table, whilst the existing variances for the electoral wards of Llanrumney and POSM were within the acceptable range, the future projections indicated that both electoral wards would have an unacceptable level of variance in 2024.

35. The Commission therefore considered whether (and what) changes could be made to those electoral wards in order to improve their electoral variances based on Cardiff Council’s projected electorate figures for 2024.

36. In particular, Cardiff Council had provided electorate statistics for the communities of Pontprennau and Old St Mellons separately (in response to the Commission’s request that electorate statistics be provided for individual communities generally). The Commission therefore considered whether electoral variances would be improved by different combinations of the communities of Pontprennau, Old St Mellons and Llanrumney, in accordance with its usual practice.

- **Whether further population statistics and projections have become available since the publication of your report and, if so, how these would impact on the recommendations if they had been available and taken into account.**

37. Since the publication of the Cardiff Final Report on 05 November 2020, and in response to representations received in relation to the Commission’s recommendations, Cardiff Council has provided to the Commission (on 7 December 2020) revised electorate forecasts for the Communities of Pontprennau and Old St. Mellons. Cardiff Council’s revised projections are as



follows:

Community	Original 2024 Projection	Revised 2024 Projection
Pontprennau	7,192	5,725
Old St. Mellons	3,218	4,686

38. The Commission has previously explained the reasons for the changes to Cardiff Council's forecasts in a letter to you sent on the 18 January 2021. In short:

- a. When providing electorate forecasts for the purposes of the Commission's Cardiff review, Cardiff Council proceeded by producing a forecast for the electoral ward of POSM as a whole, then allocating the projected growth in the electorate in that ward to the separate communities of Pontprennau and Old St Mellons on the assumption that the ratio of electors between those two communities would remain constant at its 2019 level. Cardiff Council proceeded in this way broadly for two reasons. First, information as to housing developments between 2011 and 2018 (and in some instances after 2018) was for the most part readily available to the Council only at electoral ward level rather than community level. Second, the adopted approach was considered feasible in practice, in the light of the timescales for provision of information to the Commission and the number of areas for which the Council was required to produce forecasts.
- b. However, in response to the abovementioned representations, Cardiff Council confirmed that it did in fact hold development data for the communities of Pontprennau and Old St Mellons separately, and thus was able to generate electorate forecasts for the two communities independently. Its revised forecasts were generated in this manner.

39. As the Commission explained in its letter to you, the Commission does not consider that this subsequent revision of Cardiff Council's electorate projections in any way invalidates the recommendations in relation to Llanrumney and POSM set out in the Cardiff Final Report.

40. Forecasting growth in electorate numbers is a complex mathematical exercise. When generating forecasts for the Commission's electoral reviews, councils take into account a significant volume of data, and are required to forecast for numerous communities. In these circumstances more than one methodology may be justifiable.

41. It is up to the council under review to determine how to project these forecasts. The Commission recognises that it is not an exact science and projected figures should be calculated using determination of attainers, deaths, development proposals and trends of population shift.

42. Whilst the Commission takes into account projected growth, it forms only one of the factors that the Commission considers in formulating recommended electoral

ward arrangements.

43. The Commission must make its recommendations based on the data that has been provided by the relevant Council and on the basis that the methodology used by the Council is sound. The Cardiff Final Report is based on the data used for the whole review. The Commission's position is that its recommendations cannot be withdrawn or reviewed on the basis of subsequent changes to projected figures.

44. Had Cardiff Council's revised electorate projections for POSM been available from the start of the electoral review the Commission may have considered other arrangements for the area as well as other parts of Cardiff. This would have included options where the Communities of Old St. Mellons and Pontprennau did not remain in the same electoral ward.

45. The Commission has provided a detailed response in relation to Cardiff Council's revised figures in paragraphs 116 *et seq.* below.

- **The engagement / consultation process adopted including details of the methods used, number of meetings held, level of representation, arrangements for the public to participate and the Commission's understanding of how local electorates were engaged by councils during the review process.**

46. All the engagement work that has been outlined in paragraphs 11 to 23 above was carried out in relation to the Cardiff electoral review. The Commission sent out 64 public notices to town and community councils and utilised social media to promote the review.

47. Social Media posts were made at the following intervals:

- a. at the start of initial consultation stage and at regular intervals until the closing of the consultation;
- b. at the draft report consultation stage and at regular intervals until the closing of the consultation; and
- c. at final recommendations stage the publication of the report was publicised.

48. Representations Received:

- a. Initial Consultation stage – the Commission received representations from Cardiff Council, Cardiff Council Conservative Group, three community councils and five city councillors.
- b. Draft Report Consultation stage – the Commission received 52 representations: one Community Council, three MPs, one MS, 11 representations from 22 city councillors, three political party groups from within the Council, three interested bodies and 30 members of the public.

49. Representations were sent to the Commission via email, post and the portal on the Commission website.

50. As described above, the Commission requested that the council and town and community council publicise the Cardiff review, including the initial consultation stage and the draft report consultation stage, to inform residents of the possibilities of changes to the electoral arrangements.

51. The Commission expects that principal councils and town and community councils will disseminate proposals affecting individual electoral wards, as it falls under their remit to inform their constituents and the Commission of the desired electoral arrangements for the area under consideration.

- **The full range of options considered, from which individuals or groups of individuals (whether within the Commission or otherwise) each option originated, the benefits and disadvantages of each of those options that were considered by the Commission.**
- **The assessment of community ties for each community considered at each stage of the review process and how these assessments mitigated against and in favour of each of the options above.**

52. In developing proposals, the Commission divides a local authority area into regions and considers a set of arrangements for the whole region. For the Cardiff electoral review, the electoral wards of Llanrumney and POSM were grouped together as part of the Cardiff North-East region with Cyncoed, Pentwyn, Penylan, Rumney and Trowbridge.

#### *Representations Received during the Initial Consultation period*

53. The Commission received four representations with regard to this region from Cardiff Council Conservatives Group, Councillor Phil Bale (Llanishen), Councillor Bablin Molik (Cyncoed), Councillors Diane Rees and Joel Williams (Pontprennau). The City and County of Cardiff Council suggested increasing the number of councillors in the

Pontprennau electoral ward to three, but noted that this proposal may be better suited to a subsequent electoral review.

54. Cardiff Council Conservatives Group proposed to reduce the number of councillors in the Pentwyn and Llanrumney electoral wards by one councillor each and include an additional councillor in the Pontprennau electoral ward for an overall reduction of one councillor in the area.
55. Councillor Phil Bale (Llanishen) did not presently support the arguments to increase the number of councillors for Cardiff above 75 however, the Councillor would support the deployment of an additional councillor in the Pontprennau electoral ward.
56. Councillor Bablin Molik (Cyncoed) proposed to transfer the remaining section of Hollybush Road, currently situated in the Pentwyn electoral ward, into the Cyncoed electoral ward to ensure that the entirety of Hollybush Road is included in one electoral ward. No indication of the number of electors affected was provided by the Councillor.
57. Councillors Diane Rees and Joel Williams (both Pontprennau) proposed to increase the number of councillors in the Pontprennau electoral ward from two to three. The Councillors cited the projected increase in electorate and on-going developments situated within the ward as reasons to support an increase in councillor representation.

*Options Considered at the Draft Proposal Report Stage by the Commission*

58. In consideration of the representations received and to address the projected inappropriate levels of electoral variance in the existing wards of Llanrumney and POSM the region the Commission considered the following options:
  - a. Option 1 – Cardiff Council (Existing Arrangements); and
  - b. Option 2 – Cardiff Council Conservatives Group.

**Option 1 – Cardiff Council (Existing Arrangements)**

59. This option was based on the representation submitted by Cardiff Council to retain the existing arrangements for the region.

No	Name	No. of Cllrs	Electorate 2019	2019 Ratio	75	76	77	78	Electorate 2024	2024 Ratio	75	76	77	78
1	Cyncoed	3	8,343	2,781	-14%	-13%	-12%	-11%	7,973	2,658	-24%	-23%	-22%	-21%
2	Llanrumney	3	7,694	2,565	-21%	-20%	-19%	-18%	7,575	2,525	-28%	-27%	-26%	-25%
3	Pentwyn	4	10,741	2,685	-17%	-16%	-15%	-14%	10,206	2,552	-27%	-27%	-26%	-25%
4	Penylan	3	9,696	3,232	0%	1%	2%	4%	9,929	3,310	-6%	-5%	-3%	-2%
5	Pontprennau and Old St. Mellons	2	7,537	3,769	16%	18%	19%	21%	10,410	5,205	48%	50%	52%	54%
6	Rumney	2	6,514	3,257	0%	2%	3%	4%	6,658	3,329	-5%	-4%	-3%	-2%
7	Trowbridge	3	10,926	3,642	12%	14%	15%	17%	11,289	3,763	7%	8%	10%	11%
		20			3,243	3,200	3,158	3,118			3,519	3,472	3,427	3,383

60. This scheme retained the following electoral wards: Cyncoed, Llanrumney, Pentwyn, Penylan, Pontprennau, Rumney and Trowbridge.

61. This option conformed to the representation submitted by Cardiff Council by retaining the existing arrangements for this region. However, Cardiff Council suggested increasing the number of councillors for Pontprennau by one as part of a subsequent review programme.

62. This option did not conform to the representations submitted by Cardiff Council Conservatives Group, Councillors Phil Bale (Llanishen), Bablin Molik (Cyncoed), Diane Rees and Joel Williams (Pontprennau) who all wanted to reconfigure the number of members representing the area.

63. This option retained the existing arrangements for the region however, the level of projected electoral parity remained inappropriate in the Llanrumney, Pentwyn and Pontprennau electoral wards. The existing combination of whole communities remain in place.

64. With regard to the projected 2024 electoral statistics, three of the proposed wards within this scheme were projected to have an inappropriate level of electoral variance in 2024.

### **Option 2 – Cardiff Council Conservative Group**

65. This option was based on the representation received from Cardiff Council Conservatives Group. It removed one councillor from each of the Pentwyn and

Llanrumney electoral wards and added one councillor to the Pontprennau electoral ward, resulting in an overall reduction of one councillor for the region.

No	Name	No. of Cllrs	Electors 2019	2019 Ratio	75	76	77	78	Electors 2024	2024 Ratio	75	76	77	78
1	Cyncoed	3	8,343	2,781	-14%	-13%	-12%	-11%	7,973	2,658	-24%	-23%	-22%	-21%
2	Llanrumney	2	7,694	3,847	19%	20%	22%	23%	7,575	3,788	8%	9%	11%	12%
3	Pentwyn	3	10,741	3,580	10%	12%	13%	15%	10,206	3,402	-3%	-2%	-1%	1%
4	Penylan	3	9,696	3,232	0%	1%	2%	4%	9,929	3,310	-6%	-5%	-3%	-2%
5	Pontprennau and Old St. Mellons	3	7,537	2,512	-23%	-21%	-20%	-19%	10,410	3,470	-1%	0%	1%	3%
6	Rumney	2	6,514	3,257	0%	2%	3%	4%	6,658	3,329	-5%	-4%	-3%	-2%
7	Trowbridge	3	10,926	3,642	12%	14%	15%	17%	11,289	3,763	7%	8%	10%	11%
		19			3,243	3,200	3,158	3,118			3,519	3,472	3,427	3,383

66. This scheme retained the following electoral wards: Cyncoed, Penylan, Rumney and Trowbridge.

67. The proposed changes to the existing electoral wards were as follows:

- a. Llanrumney: it was proposed to reduce the number of councillors representing the Llanrumney electoral ward by one to create a two-member electoral ward.
- b. Pentwyn: it was proposed to reduce the number of councillors representing the Pentwyn electoral ward by one to create a three-member electoral ward.
- c. Pontprennau and Old St. Mellons: it was proposed to increase the number of councillors representing the Pontprennau and Old St. Mellons electoral ward to create a three-member electoral ward.

68. This option conformed to the representation submitted by Cardiff Council Conservative Group, elements of Cardiff Council's and councillors Phil Bale (Llanishen), Diane Rees and Joel Williams (Pontprennau) representations by increasing the number of councillors in Pontprennau from two to three.

69. This scheme provided significant improvements to the projected electoral variance of the wards in the region. The existing combination of whole communities remain in place.

70. With regard to the projected 2024 electoral statistics, none of the proposed wards within this scheme were projected to have an inappropriate level of electoral variance in 2024.

71. The Commission therefore proposed, in its Draft Proposals Report in relation to Cardiff (“the Cardiff DPR”), the arrangements presented in Option 2. This option was considered to provide the best arrangement for the region as it created appropriate levels of electoral parity in all wards within the area and made appropriate provision for the projected electorate increase.

*Representations Received during the Draft Report Consultation period*

72. During the draft report consultation period the Commission received 33 representations with regard to this region from Stephen Doughty MP, Anna McMorrin MP, Jo Stevens MP, Jenny Rathbone MS, the City Councillors of Cathays, the City Councillors of Plasnewydd, the City Councillors of Grangetown, the City Councillors of Llanrumney, the City Councillors of Ely, Cllr Ed Stubbs, Cllr Norma Mackie, Cllr Stephen Cunnah, Cllr Owen Llewellyn, Cardiff Council Labour Group, Cardiff Council Conservative Group, the Welsh Liberal Democrat Group, Llanrumney Branch Labour Party and 16 local residents.

73. Jo Stevens MP supported the reduction in councillors in the Pentwyn ward.

74. Stephen Doughty MP, Anna McMorrin MP, the City Councillors of Cathays, the City Councillors of Plasnewydd, the City Councillors of Grangetown, the City Councillors of Ely, Cllr Norma Mackie, Cllr Stephen Cunnah, Cllr Owen Llewellyn, Cardiff Council Labour Group opposed the reduction in Llanrumney highlighting the increase in Butetown. (reducing to 2 the number of Councillors in Llanrumney based on a population of 7,694, whilst simultaneously proposing an increase to 3 the number of Councillors in Butetown based on an electorate of 7,550.) They also opposed the Pontprennau increase and submitted an alternative arrangement for the area. Their proposal would separate Potprennau and Old St Mellons creating two new electoral wards of Pentwyn and Pontprennau and Old St Mellons and Llanrumney.

75. Jenny Rathbone MS argued that Pentwyn should continue with four members if necessary, including the Community of Pontprennau.

76. The City Councillors of Llanrumney and Llanrumney Branch Labour Party opposed the reduction in Llanrumney highlighting the increase in Butetown. (reducing to 2 the number of Councillors in Llanrumney based on a population of 7,694, whilst simultaneously proposing an increase to 3 the number of Councillors in Butetown based on an electorate of 7,550.) They stated that the ward should retain three members. They also proposed that with some changes they could have four members. They proposed that an area of 10 streets should be transferred from Old St Mellons to Llanrumney. They also opposed the Pontprennau increase and submitted an alternative arrangement for the area which would separate Pontprennau and Old St Mellons creating two new electoral wards of Pentwyn and Pontprennau and Old St Mellons and Llanrumney.

77. Cllr Ed Stubbs requested the status quo is maintained in Llanrumney.

78. Cardiff Council Conservative Group supported the reduction in the electoral wards of Llanrumney and Pentwyn. They also supported the increase in the Pontprennau electoral ward and opposed any division of the existing ward boundaries.

79. The Welsh Liberal Democrat Group proposed the name of Pentwyn and Llanedeyrn.
80. A local resident opposed the reduction in the Pentwyn ward.
81. A local resident opposed the changes in the Llanedeyrn area and requested the status quo is maintained.
82. 13 local residents supported the reduction in councillors in the Pentwyn ward.
83. A local resident opposed the reduction in the Llanrumney ward.

*Options Considered at the Final Recommendations Stage by the Commission*

84. In consideration of the representations received and to address the representations received, the Commission considered the following options:
- Option 1 – Draft Proposals;
  - Option 2 – Labour Party;
  - Option 3 – Draft Proposals + Retaining Llanrumney; and
  - Option 4 – Secretariat Proposed.

**Option 1 – Draft Proposals**

No	Name	No. of Cllrs	Electors 2019	2019 Ratio	78	79	80	Electors 2024	2024 Ratio	78	79	80
1	Cyncoed	3	8,343	2,781	-11%	-10%	-9%	7,973	2,658	-21%	-20%	-19%
2	Llanrumney	2	7,694	3,847	23%	25%	27%	7,575	3,788	12%	13%	15%
3	Pentwyn	3	10,741	3,580	15%	16%	18%	10,206	3,402	1%	2%	3%
4	Penylan	3	9,696	3,232	4%	5%	6%	9,929	3,310	-2%	-1%	0%
5	Pontprennau and Old St. Mellons	3	7,537	2,512	-19%	-18%	-17%	10,410	3,470	3%	4%	5%
6	Rumney	2	6,514	3,257	4%	6%	7%	6,658	3,329	-2%	0%	1%
7	Trowbridge	3	10,926	3,642	17%	18%	20%	11,289	3,763	11%	13%	14%
		19			3,118	3,078	3,040			3,383	3,341	3,299

85. This option maintained the proposals contained in the Cardiff DPR. It provided significant improvements to the projected electoral variance of the wards in the region and reduced the overall number of councillors. The existing combination of whole communities remain in place.
86. This option conformed to the representations submitted by Jo Stevens MP, Cardiff Council Conservative Group and 13 local residents.
87. This option did not conform to the representations submitted by Stephen Doughty MP, Anna McMorrin MP, Jenny Rathbone MS, the City Councillors of Cathays, the City Councillors of Plasnewydd, the City Councillors of Grangetown, the City



Councillors of Llanrumney, the City Councillors of Ely, Cllr Ed Stubbs, Cllr Norma Mackie, Cllr Stephen Cunnah, Cllr Owen Llewellyn, Cardiff Council Labour Group, Llanrumney Branch Labour Party and three local residents.

## Option 2 – Labour Party

88. This option was based upon the representations received from the Labour Party.

No	Name	No. of Cllrs	Electorate 2019	2019 Ratio	78	79	80	Electorate 2024	2024 Ratio	78	79	80
1	Cyncoed	3	8,343	2,781	-11%	-10%	-9%	7,973	2,658	-21%	-20%	-19%
2	Llanrumney & Old St Mellons	3	10,024	3,341	7%	9%	10%	10,793	3,598	6%	8%	9%
3	Pentwyn and Pontprennau	4	15,948	3,987	28%	30%	31%	17,398	4,350	29%	30%	32%
4	Penylan	3	9,696	3,232	4%	5%	6%	9,929	3,310	-2%	-1%	0%
6	Rumney	2	6,514	3,257	4%	6%	7%	6,658	3,329	-2%	0%	1%
7	Trowbridge	3	10,926	3,642	17%	18%	20%	11,289	3,763	11%	13%	14%
		18			3,118	3,078	3,040			3,383	3,341	3,299

89. This option retained the Cyncoed, Penylan, Rumney and Trowbridge electoral wards

90. The proposed changes to the existing electoral wards were as follows:

- a. Llanrumney and Old St Mellons: it was proposed to combine the Llanrumney electoral ward with the Community of Old St Mellons, which is currently part of the Pontprennau/Old St Mellons electoral ward, to form a three member electoral ward.
- b. Pentwyn and Pontprennau: it was proposed to combine the Pentwyn electoral ward with the Community of Pontprennau, which is currently a part of of the Pontprennau/Old St Mellons electoral ward, to form a four-member electoral ward.

91. This option conformed to the representations submitted by Stephen Doughty MP, Anna McMorrin MP, Jenny Rathbone MS, the City Councillors of Cathays, the City Councillors of Plasnewydd, the City Councillors of Grangetown, the City Councillors of Llanrumney, the City Councillors of Ely, Cllr Ed Stubbs, Cllr Norma Mackie, Cllr Stephen Cunnah, Cllr Owen Llewellyn, Cardiff Council Labour Group, Llanrumney Branch Labour Party and three local residents.

92. This option did not conform to the representations submitted by Jo Stevens MP, Cardiff Council Conservative Group and 13 local residents. This option puts forward

a different combination of whole communities over a compact geographical area, however there are no split communities.

93. One of the proposed wards within this scheme (Pentwyn and Pontprennau) did not have an appropriate level of variance either based on 2019 or projected 2024 electorate statistics.

### Option 3 – Draft Proposal (Retain Llanrumney)

94. This option was based upon the proposals contained in the Cardiff DPR but retained Llanrumney's existing arrangements.

No	Name	No. of Cllrs	Electors 2019	2019 Ratio	78	79	80	Electors 2024	2024 Ratio	78	79	80
1	Cyncoed	3	8,343	2,781	-11%	-10%	-9%	7,973	2,658	-21%	-20%	-19%
2	Llanrumney	3	7,694	2,565	-18%	-17%	-16%	7,575	2,525	-25%	-24%	-23%
3	Pentwyn	3	10,741	3,580	15%	16%	18%	10,206	3,402	1%	2%	3%
4	Penylan	3	9,696	3,232	4%	5%	6%	9,929	3,310	-2%	-1%	0%
5	Pontprennau and Old St. Mellons	3	7,537	2,512	-19%	-18%	-17%	10,410	3,470	3%	4%	5%
6	Rumney	2	6,514	3,257	4%	6%	7%	6,658	3,329	-2%	0%	1%
7	Trowbridge	3	10,926	3,642	17%	18%	20%	11,289	3,763	11%	13%	14%
		20			3,118	3,078	3,040			3,383	3,341	3,299

95. This option retained the Cyncoed, Llanrumney, Penylan, Rumney and Trowbridge electoral wards and created a council of 80 members.

96. The proposed changes to the existing electoral wards were as follows:

- a. Pentwyn: it was proposed to reduce the number of councillors representing the Pentwyn electoral ward by one to create a three-member electoral ward.
- b. Pontprennau and Old St. Mellons: it was proposed to increase the number of councillors representing the Pontprennau and Old St. Mellons electoral ward to create a three-member electoral ward.

97. This option conformed to the representations submitted by Jo Stevens MP, Cardiff Council Conservative Group and 13 local residents.

98. This option conformed to elements of the representations submitted by Stephen Doughty MP, Anna McMorrin MP, Jenny Rathbone MS, the City Councillors of Cathays, the City Councillors of Plasnewydd, the City Councillors of Grangetown, the

City Councillors of Llanrumney, the City Councillors of Ely, Cllr Ed Stubbs, Cllr Norma Mackie, Cllr Stephen Cunnah, Cllr Owen Llewellyn, Cardiff Council Labour Group, Llanrumney Branch Labour Party and three local residents. All respondents proposed that Llanrumney should retain its existing 3-member arrangement. The existing combination of whole communities remain in place.

#### Option 4 - (Secretariat Proposed)

99. This option was formed using elements of the representations received and retains the Draft Proposals options for Pentwyn.

No	Name	No. of Cllrs	Electorate 2019	2019 Ratio	78	79	80	Electorate 2024	2024 Ratio	78	79	80
1	Cyncoed	3	8,343	2,781	-11%	-10%	-9%	7,973	2,658	-21%	-20%	-19%
2	Llanrumney and Old St. Mellons	3	10,024	3,341	7%	9%	10%	10,793	3,598	6%	8%	9%
3	Pentwyn	3	10,741	3,580	15%	16%	18%	10,206	3,402	1%	2%	3%
4	Penylan	3	9,696	3,232	4%	5%	6%	9,929	3,310	-2%	-1%	0%
5	Pontprennau	2	5,207	2,604	-17%	-15%	-14%	7,192	3,596	6%	8%	9%
6	Rumney	2	6,514	3,257	4%	6%	7%	6,658	3,329	-2%	0%	1%
7	Trowbridge	3	10,926	3,642	17%	18%	20%	11,289	3,763	11%	13%	14%
		19			3,118	3,078	3,040			3,383	3,341	3,299

100. This option retained the following electoral wards; Cyncoed, Penylan, Rumney and Trowbridge.

101. The proposed changes to the electoral wards were as follows;

- a. Pentwyn; it was proposed to reduce the number of councillors representing the Pentwyn electoral ward by one to create a three-member electoral ward.
- b. Pontprennau/Old St Mellons: it was proposed to combine the Community of Llanrumney with the Community of Old St Mellons to form a three-member electoral ward with an appropriate level of variance. The Community of Pontprennau was proposed to form an electoral ward, represented by two members.
- c. Llanrumney: it was proposed to combine the Community of Llanrumney with the Community of Old St Mellons to form a three-member electoral ward.

102. This option provided significant improvement to electoral variance in the area.

103. This option conformed to elements of the representations submitted by Stephen Doughty MP, Anna McMorrin MP, Jenny Rathbone MS, the City Councillors of Cathays, the City Councillors of Plasnewydd, the City Councillors of Grangetown, the City Councillors of Llanrumney, the City Councillors of Ely, Cllr Ed Stubbs, Cllr Norma Mackie, Cllr Stephen Cunnah, Cllr Owen Llewellyn, Cardiff Council Labour

Group, Llanrumney Branch Labour Party and 16 local residents who proposed that Llanrumney retain its 3 member representations. Elements of these representations also proposed to combine the Community of Llanrumney with the Community of Old St Mellons, and to combine the Community of Pontprennau with the Pentwyn electoral ward. This option puts forward a different combination of whole communities over a compact geographical area, however there are no split communities.

104. This option did not conform to the representations received from the Cardiff Council Conservative Group, who requested that no changes be made to the proposed Pontprennau and Old St Mellons wards put forward in the Draft Proposals.
105. This option did not conform to representations received from 2 residents of Cardiff, who requested that the Pentwyn electoral ward retain the existing four-member arrangement.
106. With regards to the projected 2024 electoral statistics, none of the proposed wards within this scheme was projected to have an inappropriate level of electoral variance in 2024.

*The Commission's Decision*

- 107. The Commission decided that Option 4 was its recommendation in relation to this region.**
108. This recommendation resulted in improved levels of electoral variance and created boundaries that would build on existing links within the region. Representations received proposed to combine the community of Pontprennau with the electoral ward of Pentwyn, however, the Commission was satisfied that a separate electoral ward of Pontprennau, represented by two members, would provide improvement to the overall variance in the Region.
109. The following reasons were noted in support of the decision:
- a. Retains four of the existing electoral wards;
  - b. Provides improvements to electoral parity;
  - c. Creates no split communities as the existing Pontprennau electoral ward is made up of two separate communities i.e. Community of Old St. Mellons and the Community of Pontprennau; and
  - d. None of the wards remain at greater than +/- 25% of the proposed county average.

110. The Commission considered that due to the compact geographical area between Llanrumney and Old St. Mellons, there were sufficient community ties between the two areas.

111. The school catchment areas cuts across community boundaries and there are no distinct geographical boundaries such as rivers, hills etc that separated Llanrumney from Old St. Mellons.

112. There are also strong transport and access links between the two communities.

113. The Commission was also satisfied that with the proposed arrangements, the Community of Pontprennau maintained its existing community boundaries.

114. The arrangements put forward by the Commission does not have any detrimental impact to access to services that are based on postcodes including access to GP surgeries.

- **The Commission's views on the overview of representations provided herewith and what changes, if any, you would make to your final recommendations in light of this information.**

115. In view of the representations provided to Welsh Government, and for the purposes of responding to your request for additional information, the Commission has produced new electoral variance calculations for the options considered by the Commission in relation to Cardiff at the final recommendations stage, using Cardiff Council's revised electoral forecasts.

#### Scenario 1 – Draft Proposals

116. As noted above, this option removed one councillor from each of the Pentwyn and Llanrumney electoral wards and added one councillor to the Pontprennau electoral ward, resulting in an overall reduction of one councillor for the region. The revised electoral variance calculations (using Cardiff Council's revised projections) are as follows:

No	Name	No. of Cllrs	Electors 2019	2019 Ratio	78	79	80	Electors 2024	2024 Ratio	78	79	80
1	Cyncoed	3	8,343	2,781	-11%	-10%	-9%	7,973	2,658	-21%	-20%	-19%
2	Llanrumney	2	7,694	3,847	23%	25%	27%	7,575	3,788	12%	13%	15%
3	Pentwyn	3	10,741	3,580	15%	16%	18%	10,206	3,402	1%	2%	3%
4	Penylan	3	9,696	3,232	4%	5%	6%	9,929	3,310	-2%	-1%	0%
5	Pontprennau and Old St. Mellons	3	7,537	2,512	-19%	-18%	-17%	10,410	3,470	3%	4%	5%
6	Rumney	2	6,514	3,257	4%	6%	7%	6,658	3,329	-2%	0%	1%
7	Trowbridge	3	10,926	3,642	17%	18%	20%	11,289	3,763	11%	13%	14%
		19			3,118	3,078	3,040			3,383	3,341	3,299

**Mae'r Comisiwn yn croesawu gohebiaeth yn Gymraeg neu Saesneg**

**The Commission welcomes correspondence in English or Welsh**

*Scenario 2 – Labour Party*

117. This option involved creating a new three-member electoral ward of Llanrumney and Old St Mellons and a new four-member electoral ward of Pentwyn and Pontprennau. The revised electoral variance calculations (using Cardiff Council’s revised projections) are as follows:

No	Name	No. of Cllrs	Electorate 2019	2019 Ratio	78	79	80	Electorate 2024	2024 Ratio	78	79	80
1	Cyncoed	3	8,343	2,781	-11%	-10%	-9%	7,973	2,658	-21%	-20%	-19%
2	Llanrumney & Old St Mellons	3	10,024	3,341	7%	9%	10%	12,261	4,087	21%	22%	24%
3	Pentwyn and Pontprennau	4	15,948	3,987	28%	30%	31%	15,931	3,983	18%	19%	21%
4	Penylan	3	9,696	3,232	4%	5%	6%	9,929	3,310	-2%	-1%	0%
6	Rumney	2	6,514	3,257	4%	6%	7%	6,658	3,329	-2%	0%	1%
7	Trowbridge	3	10,926	3,642	17%	18%	20%	11,289	3,763	11%	13%	14%
		18			3,118	3,078	3,040			3,383	3,341	3,299

*Scenario 3 – Draft Proposal (Retain Llanrumney)*

118. As noted above, this option removed one councillor from the Pentwyn electoral ward and added one councillor to the Pontprennau electoral ward, retaining Llanrumney’s existing arrangements. The revised electoral variance calculations (using Cardiff Council’s revised projections) are as follows:

No	Name	No. of Cllrs	Electors 2019	2019 Ratio	78	79	80	Electors 2024	2024 Ratio	78	79	80
1	Cyncoed	3	8,343	2,781	-11%	-10%	-9%	7,973	2,658	-21%	-20%	-19%
2	Llanrumney	3	7,694	2,565	-18%	-17%	-16%	7,575	2,525	-25%	-24%	-23%
3	Pentwyn	3	10,741	3,580	15%	16%	18%	10,206	3,402	1%	2%	3%
4	Penylan	3	9,696	3,232	4%	5%	6%	9,929	3,310	-2%	-1%	0%
5	Pontprennau and Old St. Mellons	3	7,537	2,512	-19%	-18%	-17%	10,410	3,470	3%	4%	5%
6	Rumney	2	6,514	3,257	4%	6%	7%	6,658	3,329	-2%	0%	1%
7	Trowbridge	3	10,926	3,642	17%	18%	20%	11,289	3,763	11%	13%	14%
		20			3,118	3,078	3,040			3,383	3,341	3,299

*Scenario 4 - (Secretariat Proposed)*

119. This option removed one councillor from the Pentwyn electoral ward and created two new electoral wards, namely Llanrumney and Old St Mellons (with three councillors) and Pontprennau (with two members). This reflects the arrangements recommended in the Cardiff Final Report.

No	Name	No. of Cllrs	Electorate 2019	2019 Ratio	78	79	80	Electorate 2024	2024 Ratio	78	79	80
1	Cyncoed	3	8,343	2,781	-11%	-10%	-9%	7,973	2,658	-21%	-20%	-19%
2	Llanrumney & Old St Mellons	3	10,024	3,341	7%	9%	10%	12,261	4,087	21%	22%	24%
3	Pentwyn	3	10,741	3,580	15%	16%	18%	10,206	3,402	1%	2%	3%
4	Penylan	3	9,696	3,232	4%	5%	6%	9,929	3,310	-2%	-1%	0%
5	Pontprennau	2	5,207	2,604	-17%	-15%	-14%	5,725	2,863	-15%	-14%	-13%
6	Rumney	2	6,514	3,257	4%	6%	7%	6,658	3,329	-2%	0%	1%
7	Trowbridge	3	10,926	3,642	17%	18%	20%	11,289	3,763	11%	13%	14%
		19			3,118	3,078	3,040			3,383	3,341	3,299

120. As can be seen from this table, the electoral variances arising from the Commission's recommendations in the light of Cardiff Council's revised projects remain acceptable. It also remains the case that the Commission's recommendations in relation to Pontprennau, Old St Mellons and Llanrumney conform to the majority of the representations received by the Commission during the draft report consultation stage. (See Appendix Q).

121. It is not possible for the Commission to state with certainty how its deliberations would have proceeded if the representations you have referred to had been submitted to it during the draft report consultation stage. However, having considered the matters set out in your letter, the Commission would not at this stage make changes to the recommendations in relation to Pontprennau, Old St Mellons and Llanrumney contained in the Cardiff Final Report.

122. That said, should you be minded not to accept the Commission's final recommendations in relation to these electoral wards in the light of representations made after the publication of the Commission's final report in relation to Cardiff, it would be open to you to take no action in relation to these recommendations and retain the existing arrangements :

- a. The existing arrangements may remain in place for Llanrumney (3 members) and the electoral ward of POSM (2 members). This option does create a high variance in the projected electorate for the electoral ward of POSM, as shown in Appendix R to this letter and in the table below. However this could be resolved in the course of the Commission's next review programme. (See Appendix R)



Name of electoral ward	Description	No. of Councillors	Electorate (2019)	% Variance	Electorate (2024)	% Variance
Llanrumney	Community of Llanrumney	3	7,694	-17%	7,575	-24%
Pontprennau	Communities of Pontprennau (5,207) and Old St. Mellons (2,330)	2	7,537	22%	10,411	56%

### **The Commission's response to specific representations**

123. In other respects, the Commission responds as follows to the representations referred to.

- **The basis of the population projection statistics are inaccurate as they do not take into account the proposed developments in the area. Respondents consider this to be a flaw in the process that undermines the final recommendations.**

As set out in paragraphs 39 to 43 above, the Commission does not consider that Cardiff Council's subsequent revision of its electorate forecasts for Pontprennau and Old St Mellons in any way invalidates the recommendations in relation to Llanrumney, Pontprennau and Old St Mellons contained in the Cardiff Final Report. Forecasting future electorate numbers is not an exact science, and there is no single correct methodology. Alternative views can be put forward at any time. The Commission's recommendations cannot be withdrawn or revised on the basis of subsequent changes to projected figures, as this would undermine certainty in the Commission's functions and the Commission's ability to carry out those functions. The Commission notes also that Cardiff Council is restarting the Full Review of the Cardiff Local Development Plan (See [Local development plan full review \(cardiff.gov.uk\)](https://www.cardiff.gov.uk)) and recently released Welsh Government revised projections of Cardiff population figures (See [Cardiff expected to grow much more slowly than previously thought - Wales Online](https://www.walesonline.co.uk/news/wales-news/cardiff-expected-to-grow-much-more-slowly-than-previously-thought-11111111)) suggest different electorate figures again.

- **Failure to consider the community ties that exist. The majority of respondents consider the proposed combined electoral ward of Llanrumney and Old St. Mellons has no community ties. This is based**

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Saesneg

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Welsh



upon the view Llanrumney has a large social housing population together with associated issues. This has led to concerns that in dealing with these matters there will not be capacity for issues raised by residents of Old St. Mellons to be properly dealt with. Many residents of Old St Mellons stated they received all their services from the Pontprennau area and did not believe this would continue if the boundary was changed. An example of the representation received is:

*“The 3 present councillors for Llanrumney have made it clear that they have their hands full dealing with the needs of and providing the services required by the community of Llanrumney, even though the number of electorate per councillor is well below the County average. As a result if Old St Mellons is combined with Llanrumney it follows the needs of and services required by the community of Old St Mellons would be dwarfed by the very much larger community of Llanrumney meaning Old St Mellons will be underrepresented”.*

124. The Commission took into account local ties in the course of its Cardiff review, as is set out above.
125. The changes to their electoral ward arrangements do not affect the services the residents of Old St. Mellon receive in Pontprennau. Residents will still be able to access the shops, GP surgeries, schools etc as eligibility for these services is not based on electoral ward arrangements.
126. Old St Mellons has its own Community Council that serves the Community of Old St Mellons. This will not be affected by the changes to the electoral ward arrangements.
127. All elected members are expected to represent the whole of their electoral ward, and are of course accountable to all their electors.

**•Recommendations appearing not to effectively weigh up opposing views. Many respondents raised concern about the weight the Commission appear to have placed on the views of Labour Party MSs and MPs during the review process in contrast with that of Conservative Party MSs and councillors.**

128. The Commission considered all representations made at the initial and draft consultation stages. Where alternative arrangements were put forward and provided acceptable levels of variance, these arrangements were mapped out and considered by the Commission.
129. The Commission is an independent sponsored body and does not take into consideration political matters. The Commission considered all options submitted to it in the course of its review process, as is described further above.
130. In its Cardiff review the Commission put forward proposals at the draft stage

and the final recommendations stage that were suggested by various political parties. The Commission also included a number of proposals that were supported by the Conservative party in its final recommendations.

- **Lack of consultation by the Commission – Respondents raise concerns about the lack of opportunity to make representations to the Commission about the final recommendation. The majority of the respondents consider this to be a flaw in the process and that given the nature and significance of the change to local residents the Commission should have undertaken further consultation prior to submitting its final recommendations**

131. The 2013 Act lays down a detailed process for the Commission's electoral reviews. That process provides for two consultation exercises: one prior to and one following the publication of the Commission's draft report. This is clearly set out in the 2016 Policy and stakeholders were informed of these arrangements at the start of the Commission's Cardiff review. The Commission followed its statutory process in relation to its Cardiff electoral review.

The 2013 Act also provides a period of 6 weeks following the date of the Commission's final report in relation to an electoral review during which the Welsh Government must refrain from taking action arising from that report. This provides a period during which interested parties may make representations to the Welsh Government regarding the implementation of the Commission's recommendations. The representations that you have referred to suggest that this provision has been well utilised, in accordance with the statutory scheme. The Commission therefore considers that the statutory process has been implemented properly in relation to its Cardiff review.

- **Relationship with Parliamentary boundaries. A number of respondents raised concerns about the impact of the proposed change as it would result in Old St Mellons being placed in a different constituency.**

132. The Commission does not take into account Parliamentary constituencies in its electoral reviews under the 2013 Act. The Commission makes this clear in its presentations to stakeholders at the start of each electoral review.