



<b>Subject</b>	<b>Community Governance Review: Final Recommendations</b>
<b>To</b>	Full Council
<b>Date</b>	Thursday 26 March 2026
<b>Signed off by</b>	Strategic Head of Legal and Governance
<b>Author</b>	Prepared for the Council by an external consultant
<b>Telephone</b>	Tel: 01737 276067
<b>Email</b>	<a href="mailto:cgr@reigate-banstead.gov.uk">cgr@reigate-banstead.gov.uk</a>
<b>Key Decision Required</b>	No
<b>Wards Affected</b>	(All Wards);

Recommendations	
(i)	<b>The outcome of the second stage consultation for this Community Governance Review (CGR) be noted;</b>
(ii)	<b>The Final Recommendations, which have been developed by a cross-party Member Working Group taking the results of the consultations into account, for the CGR be approved:</b>
<b>R/1</b>	Increase the number of Town Councillors for Horley Town Council from 18 to 20, to deliver better electoral equality.
<b>R/2</b>	Amend the Town Council wards for Horley Town Council to improve local representation, abolishing all current Town Council wards and replacing with Horley North East (served by 4 councillors), Horley South East (2), Horley South (2), Horley Central (3), Horley North West (3), Horley West (3), and Horley Westvale Park (3).
<b>R/3</b>	Create a new parish of Banstead & The Villages, served by a Parish Council called <b>Banstead &amp; The Villages Council</b> , with wards: Banstead Village West (2 councillors), Banstead Village East (3), Nork (4), Tadworth & Walton (4), Preston (2), Hooley & Netherne (2), Kingswood & Burgh Heath (2), Lower Kingswood & Mugswell (2), Tattenham Corner (3), Woodmansterne & Chipstead (3).
<b>R/4</b>	Create a new parish of Redhill served by a Town Council called <b>Redhill Town Council</b> with the following town wards: Redhill Central (2 councillors), Redhill East (3), Redhill North (5), Merstham North (1), Merstham Central (3), Merstham South (2), Meadvale & Hatchlands (4), North Earlswood (4), Earlswood & Whitebushes (3)
<b>R/5</b>	Create a new parish of Reigate served by a Town Council called <b>Reigate Town Council</b> with the following town wards: Pilgrims (5 councillors), Priory (4), Chartfield (3), Woodhatch (3), South Park (4).

**(iii) This Council recommends that its successor council promptly adopts and implements the Community Governance Order.**

### **Reasons for Recommendations**

To ensure that community governance within the area under review will be reflective of the identities and interests of the community in that area and is effective and convenient.

The Council is required to keep parish electoral arrangements under review. Given the implications of the reorganisation of Local Government in Surrey, it has been necessary to review parish arrangements across the borough to bring them into alignment, ensure they remain fit for purpose, and to ensure they continue to reflect local needs. This report provides Final Recommendations, which are based on the responses to the public consultation on the Draft Recommendations.

### **Executive Summary**

A community governance review (CGR) seeks to ensure that the governance arrangements of the existing parishes and unparished areas in the borough are reflective of the identities and interests of the community in that area.

This report provides the Final Recommendations, which are based on the outcome of the public consultation on the Draft Recommendations. Subject to approval by Council at this meeting, these recommendations will be provided to the Shadow Council to progress to implementation.

**Full Council has authority to approve the above recommendations.**

### **Statutory Powers**

1. The Local Government and Public Involvement in Health Act 2007 (Part 4) devolved power from the Secretary of State to principal district councils to carry out community governance reviews and put in place or make changes to local community governance arrangements.
2. Section 93 of the 2007 Act allows principal councils to decide how to undertake a review, provided that it complies with certain duties in that Act including details set out relating to consultation, the need to ensure any proposals reflect the identities and interests of the community in that area and is effective and convenient. The Council has to publish its recommendations but the manner in which the Council consults with its residents is not prescribed.
3. The Council, as principal council, has authority to take decisions about parish electoral governance arrangements under Sections 79 and 102(2) the Local Government and Public Involvement in Health Act 2007.
4. A Borough Council that is undertaking a review, must notify the County Council of the review and its terms of reference (including any modifications to those Terms), as per section 79(3).

5. Sections 81 – 84 of the said Act cover relevant aspect of the Terms of reference for the review. These are to be the Terms under which the review is to be undertaken and approved by the Council. The Terms must specify the area under review and any modifications to make to them, for example, following any petition that may be received during the course of the review. As per the Guidance, there is no 'one size fits all' approach, nevertheless on general principles, the Terms of reference should set out clearly the matters on which a community governance review is to focus. As soon as practicable after deciding the Terms, they must be published.
6. A petition may still be received and there is a duty under section 84 or power to respond under section 85 of the Act, dependent on the Terms of reference approved.
7. Section 102(6) provides the Terms of reference of a community governance review "allow for a community governance petition or community governance application to be considered" if the terms of reference of the review are such that—(a) the area under review includes the whole of the petition area or application area; and (b) the recommendations to be considered by the review include all of the petition's or application's specified recommendations.
8. Article 4 of the Council's Constitution states that functions relating to community governance are reserved to Council, as referred in the Local Authorities (Functions and Responsibilities) (England) Regulations 2000.

## Background

9. The CGR is being conducted in accordance with the Local Government and Public Involvement in Health Act 2007. Members are invited to note that references in legislation to a 'parish' also include a parish which has an alternative style (such as 'town', 'village' or 'community' council) and parish meetings.
10. In June 2025, Council agreed to undertake a Community Governance Review (CGR), with the publication of the Terms of Reference on 19 June 2025. Evidence and information gathering took place alongside local briefings and meetings, and a public consultation ran from 24 July to 18 September 2025.
11. The Terms of Reference for the CGR were broad, allowing for a review of all aspects of community governance within the council area. This includes, for example, the creation or naming of a parish, the establishment of a separate parish from an existing parish, alteration of parish boundaries, abolition or dissolution of a parish, change to parish electoral arrangements or parish grouping.
12. Now that the CGR has commenced, the Council is legally required to continue the process through to its conclusion.
13. Following the initial consultation, a cross-party Member Working Group developed the Draft Recommendations. These were considered, discussed and agreed by Council on 6 November 2025 and, consequently, a public consultation on the Draft Recommendations commenced.

### **Why conduct a Community Governance Review?**

- 14.** Good practice suggests that principal councils should undertake periodic reviews of the parish arrangements every 10 to 15 years, however a review has not been undertaken within the Borough during this period.
- 15.** In light of the proposals for reorganisation of Local Government in Surrey, the Council is keen to ensure the retention and improvement of community engagement and cohesion, local democracy and the delivery of effective local services.
- 16.** A Community Governance Review also provides an opportunity to review all arrangements and to put in place strong, clearly defined boundaries, tied to firm geographic features, and potentially remove any parish boundary anomalies that may exist.
- 17.** It is important to note that any future change to arrangements, including the creation of new parish councils, will not – on its own – be a substitute for the new unitary authority incorporating appropriate community engagement into its own structures, which will still be expected by Government.

## Key Information

### Decision-making process and statutory criteria

18. The Local Government and Public Involvement in Health Act 2007 sets out two statutory criteria. The Council must, by law, have regard to the need to secure that community governance within the area under review:
- reflects the identities and interests of the community in that area, and
  - is effective and convenient.
19. In addition, the Council must take into account the 2010 government guidance ([published by the then Department for Communities and Local Government \(DCLG\)](#)). The Council must also have due regard for responses submitted during the consultations and be open and transparent such that local stakeholders are made aware of the outcome of the decisions and the reasons behind those decisions.
20. Whilst Members are advised to read the DCLG guidance in its entirety, some key extracts are included below. Essentially, the guidance supports the 2007 Act requiring that local people are consulted, and that their views are taken into account during the CGR. Whilst Reigate & Banstead Borough Council councillors are the decision-makers, those decisions must be based on evidence submitted through the CGR consultation process. *Numbers refer to paragraph numbers in the DCLG guidance; emphasis added for clarity:*

*7. The guidance supports and helps to implement key aspects of the 2006 white paper. 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.*

*58. **It is clear that how people perceive where they live - their neighbourhoods - is significant in considering the identities and interests of local communities and depends on a range of circumstances, often best defined by local residents. Some of the factors which help define neighbourhoods are the geography of an area, the make-up of the local community, sense of identity, and whether people live in a rural, suburban, or urban area.***

*59. Parishes in many cases may be able to meet the concept of neighbourhoods in an area. Parishes should reflect distinctive and recognisable communities of interest, with their own sense of identity. Like neighbourhoods, **the feeling of local community and the wishes of local inhabitants are the primary considerations.***

*95. The recommendations **must take account of any representations received and should be supported by evidence which demonstrates that the recommended community governance arrangements would meet the criteria set out in the 2007 Act.***

- 21.** It is important to note that it is Reigate & Banstead Borough Council (RBBC) who decide community governance arrangements. Therefore, where difficult decisions must be made, consideration must be given to opposing and differing views in light of legislation, best practice, and official guidance. Best practice guidance includes, for example, not having 'island' or 'donut' parishes or parish wards which are wholly surrounded by one other parish or parish ward, and using identifiable markers for boundaries (such as rivers, railways, roads and the edges of properties).
- 22.** Essentially proposals for change should first identify the identities and interests of the communities, and then consider the governance arrangements for that area.
- 23.** Members are invited to note that the mechanism to appeal is by way of Judicial Review, a potentially expensive and damaging mechanism open to local stakeholders if there is a failure in the decision-making process. For example, a failure to consult properly, or a failure not to take into account relevant consideration, or conversely irrelevant issues are taken into account in reaching a decision. In other words, it is important to ensure that community governance decisions can be justified both evidentially and procedurally to avoid potential legal challenge.
- 24.** It is also important to recognise that the number of responses received is not necessarily strong evidence on the strength of feeling either for or against any particular viewpoint. It is true that stakeholders preferring the status quo may not make representations until and unless there is a suggestion of significant change that they would otherwise oppose. Similarly, individuals may choose not to respond to a consultation for a number of reasons whether they agree with the proposals or not. Therefore, the detailed responses, rather than the pure number of responses, is vitally important in assessing the responses to the consultation and developing the Final Recommendations.
- 25.** The aim of a CGR is to ensure community governance arrangements are appropriate at a local level. It is therefore not always appropriate to use Ward or Division boundaries to determine parish boundaries, although these will be the new warding arrangements for the unitary authority and so are taken into account.
- 26.** Members are reminded that the scope of the CGR is defined in law. Whilst some responses have been received that are outside of the scope of the CGR, this Council has no authority to make decisions or recommendations on those matters and so cannot engage in meaningful discussion about them. Specifically, the CGR cannot consider or determine:
  - Parliamentary constituency boundaries
  - County Divisions, Borough or Unitary authority wards, other than requesting consequential amendments are made to align with any changes to parish boundaries
  - The number of County, Borough or Unitary Councillors
  - The powers and authority of different tiers of government (for example, a CGR cannot recommend granting planning determination powers to parish councils)

## Forms of community governance

27. The 2010 government guidance ([published by DCLG](#)) highlights the range of options available for community governance. These include:

- Parish councils – Democratically elected bodies with powers and responsibilities within the local parish area, independent of other council tiers and budgets. Includes the ability to raise funds through the parish precept (via Council Tax), as well as responsibilities to represent local people to other bodies (such as on planning matters).
- Parish meetings – Where the electorate of a parish area is small, a full parish council may not be appropriate. Instead, a parish meeting can be used to represent local electors. Only available for parishes of less than 1000 electors.
- Area committees – These can be part of the structure of some principal authorities where they choose to have them. They exist to advise or make decisions on local issues and help shape local service provision. They are typically run and resourced by the principal authority, and local councillors serve on them. As such, whilst they can represent local voices in a given area, they are not independent and do not have statutory elections.
- Neighbourhood management programmes – These are also set up by principal authorities and may include other agencies. They were created to allow local people to work with local agencies to improve services at a local level. They are expected to ‘implement’ arrangements to improve quality of life rather than advise or make decisions on local matters. These are also not truly independent and do not have statutory elections.
- Tenant management associations – These usually function on urban housing estates and can take responsibility for housing services on behalf of the local housing authority. They are independent bodies, although not applicable to wide areas or rural communities.
- Area or community forums – These are set up by the principal authority or local residents to give communities a say on council matters or local issues. They can be focused on a single issue, or broader in nature. Membership usually includes local councillors, and people who live or work in the area. They do not have statutory elections nor formal powers.
- Residents’ and tenants’ associations – These enable local people to participate in local issues affecting their local area, which can comprise a very small housing estate through to a much broader community area. They can be set up by any group of local people, who can decide on membership, leadership and representation. To work effectively with other bodies, residents’ associations must be able to show they are accountable and represent the views of the whole

community rather than narrow interests of just a few local people. They do not have statutory elections nor formal powers.

- Community associations – These are usually formed through the Charity Commission, and include local councillors and local people. Membership is usually open to everyone resident in the local area.

**28.** The government guidance states (para. 137) “what sets parish councils apart from other kinds of governance is the fact they are a democratically elected tier of local government, independent of other council tiers and budgets, and possess specific powers... Their directly elected parish councillor represent local communities in a way that other bodies, however worthy, cannot since such organisations do not have representatives directly elected to those bodies.” It also notes that some other forms of governance may be useful building blocks towards a parish council.

**29.** As such, the preferred model for implementing local community governance through this CGR is by considering the introduction of parish councils.

### **Consultation**

**30.** The consultation on the Draft Recommendations took place from 7 November 2025 to 16 January 2026, inviting respondents to give their views on community governance arrangements in their local area and across the borough. The following were consulted by sending details of the CGR and a link to the online feedback form:

- Community organisations, residents’ associations and local businesses, via local authority-held mailing lists
- all householders, via a communications campaign including public meetings, press releases, social media, newsletters, libraries, and website,
- paper leaflets to all households
- all parish councils
- all Borough Councillors
- relevant County Councillors
- local political parties
- Members of Parliament
- Police & Crime Commissioner

**31.** Respondents could respond to the consultation by:

- Completing the online form
- Returning the paper leaflet and form by reply-paid post or handing it in to a council office
- Submitting a response by email

**32.** During the process of the review, feedback was received from a number of residents and elected Members regarding the consultation process and public awareness activity to encourage participation in the survey. There were reports that in some locations not all residents had received copies of the paper leaflets; in response to these reports, additional copies of the paper leaflets were posted to identified

locations. There was a proposal received that the consultation be extended in some areas to address potential lack of awareness, but it was judged that the overall quality of the communication process was suitable, and the consultation therefore concluded in line with the agreed schedule. A formal complaint was received regarding the process, raising concerns regarding its adherence to the Gunning Principles. This complaint was not upheld, and a further review of the handling of the complaint by an external independent person also did not uphold the complaint.

- 33.** A wide range of responses were received. These have been weighed against the statutory criteria. Note that many respondents would not have been aware of these criteria when responding, although the points they have raised have been considered against those criteria as widely as possible.
- 34.** A total of 2260 online responses were received; respondents could provide information about more than one area. These included 1738 complete electronic submissions, and 522 incomplete submissions (where a respondent left the form before submitting, for whatever reason). Of the 522 incomplete submissions, 452 were fully blank and therefore excluded from the analysis; 31 were from the same respondent as a full complete submission was received later and these 31 incomplete submissions were therefore excluded from the analysis; leaving 39 incomplete submissions that contained a partial response from a unique individual and these were included in the submission.
- 35.** In addition, responses were validated using the information supplied and collected during submission to ensure duplicates were not counted, although the CGR consultation is not a referendum. A total of 6 responses were identified as duplicates and excluded from the analysis. Further, one respondent made a second submission and asked for their original to be removed; this has been done. This leaves a total of 1770 electronic submissions included in the analysis.
- 36.** Further, responses sent by paper or email were digitised and included in the analysis. A total of 349 such responses were received.
- 37.** Text responses have been summarised using AI technology with human review and oversight, and individual comments reviewed to ensure complete representation has been made. Each category of response has been considered and a summary response included within the appropriate tables below.

### **Final Recommendations**

- 38.** The Final Recommendations are set out here, for discussion and subsequent agreement by Full Council. If approved, they will be provided to the successor council along with a draft Community Governance Order.
- 39.** This section of the report presents the rationale and evidence for the Recommendations, setting out the Draft Recommendations and responses to them.
- 40.** The Council is required to publish the reasons for making its decisions as a result of a CGR. As such, a summary of the responses to the consultation are included at the

appropriate section of the report, with all submissions included at the end, with personal information redacted or removed.

41. Members are invited to note that, based on the underpinning legislation and guidance, which set out the statutory criteria for a CGR as well as the need to take into account local representations made through the consultation processes. All recommendations must (1) be supported by evidence, (2) have been brought to the authority's attention during the CGR to date, and (3) have been consulted upon or raised through the consultation process. **This means that proposals for new governance arrangements cannot be considered at the final stage of the review only.**
42. It is noted that the Council or its successor council is required to continue to monitor community governance arrangements on an on-going basis, and a future CGR may be required in specific areas as further residential development takes place.
43. Note that maps are included at the end of this report where a proposed Final Recommendation includes a change to an existing boundary or creation of a new boundary.
44. Where new or amended boundaries to parishes and/or parish wards are proposed, these are based on an understanding of where the communities are and how they interact. However, for reasons of practicality, it is important to consider the current placement of County Divisions (which will become the new Unitary Authority wards) and, where possible, align external boundaries to them. This is because parish wards cannot straddle Unitary Ward boundaries, and would need to be split; this has been avoided where it would result in very small parish wards comprising a handful of properties (which would lead to ineffective local governance). This may be reviewed in future once the new Unitary Authority warding arrangements are reviewed in a few years' time.
45. In considering the number of parish councillors to serve a particular area, we have used the following:
  - The statutory minimum number of councillors is five; there is no maximum, although it becomes more difficult and less effective or efficient to maintain an excessively large parish council. This allows this Council to consider the current number of parish councillors by area, recognise the different situations within each area, and then assess the appropriate number of parish councillors by area. There is no requirement for the number of electors represented by a single parish councillor to be the same between different parishes, although they should be comparable between wards of the same parish.
  - Whilst the National Association of Local Councils (NALC) published guidance in 1988 on the suggested number of parish councillors per parish area based on the size of the electorate, these are non-statutory and there is no requirement for parish councils within an area to have equal ratios of electors to councillors. Further, these pre-date the digital age and do not necessarily reflect the ways in

which parish councillors communicate with and represent their local communities. However, they do provide a good benchmark against which to consider the number of councillors in each parish council.

**46.** Where proposals suggest a change in the number of parish councillors, this is based loosely on NALC guidance, although reduced to reflect current elector:councillor ratios in existing parishes and recognising the impact of technology on capacity. Final Recommendations take responses from parish councils and local residents into account.

- The NALC recommendations are:

Number of electors	Councillors
Up to 900	7
901 - 1,400	8
1,401 - 2,000	9
2,001 – 2,700	10
2,701 - 3,500	11
3,501 - 4,400	12
4,401 - 5,400	13
5,401 - 6,500	14
6,501 - 7,700	15
7,701 - 9,000	16

Number of electors	Councillors
9,001 - 10,400	17
10,401 - 11,900	18
11,901 – 13,500	19
13,501 - 15,200	20
15,201 - 17,000	21
17,001 - 18,900	22
18,901 - 20,900	23
20,901 - 23,000	24
Over 23,000	25

**47.** These Final Recommendations take public consultation responses into account, and have been changed and revised as a result of the consultation. The Council is grateful to all those who responded to the consultation to enable us to develop the Final Recommendations that reflect the interests and identities of local communities, whilst providing for effective and convenient local government.

#### **48. General responses**

Horley Town Council, in their submission, supported the approach of providing local parish councils across the borough, to “enhance democratic accountability, ensure services are responsive to local needs and help foster a stronger sense of community identity. This would further enable new residents to engage fully in local decision-making, while ensuring that local governance structures keep pace with a rapidly expanding population and built out environment from more housing developments.”

Surrey County Council noted the value and importance of local councils. However, they also expressed concern that “resourcing a CGR at this stage may not be in the best interests of the council or the communities it serves” given the increased demands of local government reorganisation. As noted above, once a CGR has commenced the Council is required to continue it and has identified and ringfenced the resources to enable that to happen. Reigate & Banstead Borough Council feel that a CGR at this time is important, given it is a unique and valuable opportunity to ensure local people have a say in how their communities are represented and governed as local government reorganisation takes place. Further, once the new unitary authority (successor council) is in place it is uncertain that undertaking a CGR to review and amend community governance arrangements or to

create or amend parish and town council arrangements would be a high priority in the short to medium term.

Surrey County Council also raised that “the potential changes to governance structures, local authority boundaries, and service delivery models under LGR could mean the outcomes of this CGR are misaligned with future arrangements or in need of subsequent revision”. As identified above, the changes to wider local government structures were considered to constitute an opportunity to ensure local people have a say in how their communities are represented and governed. Whilst it is possible that other future governance arrangements may lead to different views on arrangements, it is uncertain that this would happen in the near term. As identified in paragraphs 27 to 29, other forms of community governance are available, but parish councils are set apart by having directly elected local representatives.

## 49. Horley Town Council

### Electorate and current arrangements

Parish ward	Electorate: 1 May 2025	Number of town councillors	Forecast electorate: 1 May 2030
Horley Central North	1,180	2	1,201
Horley East	4,164	4	4,207
Horley South	6,254	5	6,452
Horley West	8,070	6	8,395
Horley Upper North	653	1	653
<b>Total:</b>	20,321	18	20,908

### Draft Recommendations

- DR/1 Increase the number of Town Councillors for Horley Town Council from 18 to 19, to deliver better electoral equality.
- DR/2 Amend the Town Council wards for Horley Town Council to improve local representation, abolishing all current Town Council wards and replacing with Horley North East (served by 4 councillors), Horley South East (2), Horley South (2), Horley Central (3), Horley North West (3), Horley West (3), and Horley Westvale Park (2).

### Consultation responses

A total of 221 responses were received.

Horley Town Council responded, fully supporting the Draft Recommendations. They noted that the proposals provide an approach that will deliver effective and convenient local government, and that they take into account the significant areas of residential growth. They felt the proposed new wards reflect local communities and will support increased local accountability and representation.

*Do you support the proposal to increase the number of Town Councillors?*

No 50  
 Not sure 24  
 Yes 147

*Of the 50 respondents indicating they do not support the proposal:*

<b>Category</b>	<b>Summary of responses</b>	<b>Response</b>
<b>Financial/Taxation</b>	Double taxation; high cost-to-benefit ratio; burden during cost-of-living crisis; fees for local amenities (recreation/cemetery).	Town councillors are unpaid, and an increase from 18 to 19 will not increase costs to the local community.
<b>Bureaucracy</b>	Redundancy with Borough/Unitary councils; "too many layers"; slowing down decision-making and change.	Horley already has a town council, and the increase from 18 to 19 councillors will not introduce an additional layer of local government.
<b>Council Scale</b>	Too many councillors; "too many cooks"; belief that fewer people make better decisions; unnecessary complexity.	The increase from 18 to 19 councillors will deliver better electoral equality overall, leading to better local representation. The new arrangements would be a relatively significant improvement in terms of electoral equality, but only a relatively small change in overall numbers and potential associated complexity.
<b>Effectiveness</b>	Lack of tangible results; "town is dying"; failure to provide community cohesion; lack of communication from officials.	This was a minority view. Local residents are able to stand as local councillors at elections to implement the changes in their community they seek, if they wish. The proposed changes seek to improve electoral equality, which would be expected to be beneficial in supporting community cohesion and communication.
<b>LGR Alignment</b>	Inconsistency with Local Government Reorganisation (LGR) goals; undermining the efficiency of the new Unitary Authority.	In areas which have undertaken unitarisation previously, the role of parish councils has expanded (such as in Cornwall), and new parish and town councils have been created in areas without them. Parish level councils can provide much-needed local representation, particularly when

		unitary authorities have fewer councillors overall than the two layers they replace. Creating, expanding and reviewing parish and town councils remains an important part of local governance regardless of LGR. It appears, across the area, that some respondents felt that amending a parish or town council was unnecessary because LGR will keep both RBBC and the new Surrey councils, however through LGR the RBBC will be removed, which may lead to additional need for ensuring local communities are represented, including through creation of parish councils where appropriate.
<b>Abolition</b>	The Town Council should be abolished; move functions to RBBC.	RBBC is, under LGR, being abolished. The role of Horley Town Council will continue. This proposal was also not significantly supported during either the stage 1 or stage 2 consultations.

*Of the 147 respondents indicating they do support the proposal:*

<b>Category</b>	<b>Summary of responses</b>	<b>Response</b>
<b>Population Growth</b>	Significant housing increases (Westvale Park, The Acres) have grown the population; representation must scale alongside town expansion.	The proposed increase will deliver improved electoral equality and better local representation.
<b>Electoral Equality</b>	Ensures a fairer ratio of electors to councillors (approx. 1:1,000); re-drawing wards prevents "share of voice" from being disproportionate.	The increase from 18 to 19 councillors will provide better electoral equality and local representation.
<b>Workload Sharing</b>	Councillors are unpaid volunteers; more members help "spread the load," prevent burnout, and allow for quicker responses to residents.	Increasing the number of councillors will provide greater capacity.
<b>Local Advocacy</b>	Vital to have a strong "Horley voice" to feed back to the new	The local representative role of the Town Council will continue

	East Surrey Unitary Authority and to influence the local MP.	when the Borough Council is abolished under LGR.
<b>Decision-Making</b>	Moving from 18 to 19 councillors creates an odd number, which prevents tied votes and allows for clearer decisions.	Increasing the number of councillors will provide greater capacity. However, tied votes are unusual at a parish council level, and mechanisms in place already (such as casting vote of the Chair) prevent stalemate situations.
<b>Community Resilience</b>	Local councillors "bridge the gap" between residents and distant decision-makers; helps maintain "community feel" in a growing town.	The local representative role of the Town Council will continue when the Borough Council is abolished under LGR.

*Do you support the proposal to amend the town wards?*

No	45
Not sure	44
Yes	131

*Of the 45 respondents indicating they do not support the proposal:*

Category	Summary of responses	Response
<b>Stability &amp; Continuity</b>	The current structure is familiar; residents know who represents them. Altering boundaries risks weakening the connection between councillors and the community. The current wards are "fine as they are" and have "been like this for years" and provide familiarity and clear lines of accountability.	The current Town Council wards were implemented following a recent review of borough wards, which caused a complicated and inequal set of wards. The proposed wards are based on the old boundaries but deliver clarity and improve equality.
<b>Opposition to Complexity</b>	Changes are viewed as making local government "more complicated than it needs to be." Residents prefer a simplified, streamlined system.	The previous (current) wards were partly due to the Local Government Boundary Commission for England (LGBCE) review and not reflective of local communities. The proposed wards should remain in place for years to come, creating a simpler and more coherent warding arrangement that reflects local communities.

<b>Unitary Authority Alignment</b>	Local Government Reorganisation (LGR) was meant to "de-layer." Many feel that redrawing wards or keeping town councils at all contradicts the goal of a single Unitary Authority.	The redrawing of Town Council wards will not create an additional tier of local government, but instead delivers better equality at an existing tier.
<b>Community Identity</b>	Established ward boundaries reflect "established community identities." Changing them might lead to an imbalance where some areas gain disproportionate influence.	Whilst stability is important in delivering local services and ensuring accountability, the current Town Council wards are not considered fit for purpose due to the one very small anomalous ward. The proposed wards lead to better electoral equality in each area.
<b>Cost Avoidance</b>	Any administrative change is seen as an "added cost" at a time when the council should be focused on reducing expenditure.	The direct costs associated with parish ward changes are small. The reduced complexity for local residents, particularly those in the current Upper North ward, and small separate ward election, will likely outweigh small increase in costs.

*Of the 131 respondents indicating they do support the proposal:*

<b>Category</b>	<b>Summary of responses</b>	<b>Response</b>
<b>Electoral Equity</b>	Ensures a "fairer distribution" of voters per councillor; aims for a consistent ratio across the town so no ward is "overburdened."	The new wards improve electoral equality.
<b>Westvale Park Integration</b>	Recognises Westvale Park as a "town on its own" that needs dedicated representation to bridge the "them and us" divide.	Given the significant growth in the area, this is an important factor in redrawing the Town Council ward boundaries.
<b>Localised Focus</b>	Smaller, more compact wards allow councillors to focus on specific neighbourhood issues rather than being "too thin" across large areas.	The new wards improve local representation.
<b>Modernisation</b>	The map should reflect "Horley now" rather than the town as it existed before major recent developments.	The revised boundaries reflect the recent changes and growth in the town.

*If you have any other comments about this area, please tell us here.*

The comments made in this largely reflect responses to the previous questions. For example, submissions about increased costs due to new wards or more councillors (neither of which will increase costs), and the timing of the review and creating a new parish council “undermining” the benefits of LGR (although this is not a new parish council). Other submissions comments on new housing schemes and loss of green open spaces, or provision of local bus services, car parking issues, litter, eyesore buildings, and traffic and road safety; these are all outside of the remit of a CGR.

## **Considerations**

Whilst there are some local residents who do not support the increase in the number of councillors, nor the changes in ward boundaries, both improve local representation and equality, and support effective and convenient local government. The most significant concerns raised were about costs (which will not increase through either of the proposed changes) and the suggestion that parish councils do not fit within a streamlined local government following LGR (whereas the role of parish and town councils is not removed by currently announced local government reorganisation legislation, and such councils are anticipated to remain an important part of local democracy, service provision and representation).

The statutory criteria are whether the changes will support effective and convenient local government, and if they represent the identities and interests of local communities. The proposed increase in the number of town councillors, and the redrawn town council ward boundaries, both support these criteria. New wards represent the local communities more accurately and more fairly than the current arrangements, and the numbers of town councillors is more equitable. None of the responses opposed to the proposals suggest that either proposal would fail to meet the statutory criteria or make current arrangements worse.

Following further consideration of the Draft Recommendations and the responses received, it was considered that additional improvement could be made to the representation of local community interests and identities through increasing the number of councillors for the Horley Westvale Park ward from 2 to 3. This change was considered better balance representation between wards, whilst maintaining effective and convenient local government.

The responses to consultation responses received regard the draft recommendation change from 18 to 19 councillors are considered to apply similarly to an increase from 18 to 20 councillors, and the change is therefore considered to be in line with identified local interests. There is a requirement to ensure electoral equality between wards in any given council, and the increase to 20 councillors enables this to happen.

On balance, therefore, the Final Recommendations proposed following the consultation, taking local responses into account, are as per the Draft Recommendations, with the exception of the number of proposed councillors for Horley Westvale Park ward increasing from 2 to 3, and the overall number of town councillors increasing from 18 to 20, rather than 18 to 19.

<b>Horley Town wards</b>	<b>Electorate: 1 May 2030</b>	<b>Number of councillors</b>	<b>Elector:Cllr ratio (variance)</b>
--------------------------	-----------------------------------	----------------------------------	--

Horley North East	4407	4	1102 (+5%)
Horley South East	2351	2	1176 (+12%)
Horley South	2173	2	1087 (+4%)
Horley Central	3089	3	1030 (-2%)
Horley North West	2982	3	994 (-5%)
Horley West	3120	3	1040 (-1%)
Horley Westvale Park	2786	3	929 (-11%)
<b>Total</b>	<b>20,908</b>	<b>20</b>	

### Final Recommendations

R/1	Increase the number of Town Councillors for Horley Town Council from 18 to 20, to deliver better electoral equality.
R/2	Amend the Town Council wards for Horley Town Council to improve local representation, abolishing all current Town Council wards and replacing with Horley North East (served by 4 councillors), Horley South East (2), Horley South (2), Horley Central (3), Horley North West (3), Horley West (3), and Horley Westvale Park (3).

## 50. Salfords & Sidlow Parish Council

### Electorate and current arrangements

Parish ward	Electorate: 1 May 2025	Number of parish councillors	Forecast electorate: 1 May 2030
Salfords and Sidlow No.1 (HRE2)	1,828	6	1,977
Salfords and Sidlow No.2 (HRW1)	481	1	544
Salfords and Sidlow No.3 (HRE1)	458	1	493
<b>Total:</b>	<b>2,767</b>	<b>8</b>	<b>3,014</b>

### Draft Recommendations

- DR/3 Extend the existing parish of Salfords & Sidlow to include Earlswood and Whitebushes, with parish wards as follows: Salfords South (4 councillors), Salfords North (1), Earlswood (4), Whitebushes (4), Sidlow (1).
- DR/4 Change the name of the parish to Salfords, Sidlow and South Earlswood.
- DR/5 Consult with residents in the proposed extension area, to identify if DR/3 is not supported, which of the following they prefer:
- (a) Remain unparished;
  - (b) Become an independent parish with two wards (Earlswood, 4 councillors; Whitebushes, 4 councillors); or
  - (c) Become part of a new Redhill town

### Consultation responses

A total of 221 responses were received.

Salfords & Sidlow Parish Council (SSPC) responded to the consultation, objecting to all of the proposals. Note that the Draft Recommendations, which were consulted upon, were based in part on the Parish Council's prior submission. Their specific points are summarised:

- (1) SSPC have stated that their previous submission, which helped shaped the Draft Recommendations, were required to have led to a dialogue with residents and RBBC prior to any further consultation (with the dialogue including the use of RBBC resources to estimate SSPC future resource needs). They went on to say that as "none of these conditions are met" they could not support the Draft Recommendations. Members are invited to note that (a) the timescale for this CGR is very tight and that additional rounds of consultation with specific groups of residents is not possible, (b) the consultation on the Draft Recommendations is the consultation with local people required both by law and requested by SSPC, and (c) RBBC is not in a position to provide specific additional resource or support to any individual parish council, and that proposals made by them need to meet the criteria set out by law.
- (2) SSPC felt that the reduced number of councillors representing the current parts of the parish (given the relatively larger electorate from incoming areas) would lead to

too many inexperienced councillors representing those new communities and an increased workload for the existing councillors as a result.

- (3) SSPC object to the exclusion of the Woodhatch area within the proposals. Members are invited to note this was fully considered in the previous Council paper, and it was agreed that the area did not appear to align more closely with Sidlow than with Redhill and Reigate.
- (4) SSPC object to the reduction in councillors for Salfords ward from 6 to 4. Members are invited to note that the total number of parish councillors for a parish council is based largely on the NALC recommendations, and then apportioned by electorate into each ward. To ensure electoral equality, the number of parish councillors proposed for Salfords ward was reduced. The alternative would be a much larger parish council to represent all the additional areas fairly and equally.
- (5) SSPC stated "As a Parish Council of 50 years standing, we entirely understand the benefits that representation would bring to residents in South Earlswood and Whitebushes. We do not yet understand (and no one at R&BBC has articulated) any benefits that expansion might bring to the current Parish residents. Indeed, we can see a significant negative impact of an unplanned, forced expansion." Members are invited to note that the proposal to expand SSPC into South Earlswood and Whitebushes was made by SSPC in the previous round of consultation.
- (6) SSPC feel the proposed expansion to include South Earlswood and Whitebushes lacks rationale or demand. Members are invited to note that the proposal to expand SSPC into South Earlswood and Whitebushes was made by SSPC in the previous round of consultation.
- (7) SSPC feel that expansion of the parish risks community identity and effective representation. They feel that "consultation with affected communities" has not been done. Members are invited to note that the proposal to expand SSPC into South Earlswood and Whitebushes was made by SSPC in the previous round of consultation, and the consultation on the Draft Recommendations *is* the public consultation with local residents and affected communities.
- (8) SSPC go on to say that they support a separate South Earlswood and Whitebushes parish council, or for that area to become part of a new Redhill & Reigate parish.

*Do you support the proposal to extend the parish to include South Earlswood and Whitebushes, creating the new parish wards as listed above?*

No	146
Not sure	22
Yes	53

*Of the 146 respondents indicating they **do not** support the proposal:*

Category	Summary of responses	Response
<b>Rural Marginalization</b>	Sidlow is "uniquely rural." Residents fear their voices on rural issues (e.g., Gatwick Route 4, Green Belt protection) will be "swamped" by urban interests in Whitebushes. Preference to remain in S&SPC or to join with Leigh.	Whilst a parish council has a collective responsibility for the entire parish, it is possible that local issues that affect a small proportion of residents may be more difficult to address compared to when they affect a larger proportion.
<b>Identity Loss</b>	Salfords identifies as a village. Merging with urban suburbs (Redhill/Earlswood) is seen as "forcing" an urban identity onto a rural/village community.	Under the Draft Recommendation, the parish electorate would be increased significantly through the addition of a very different community that faces distinct issues. Whilst this was originally proposed by the parish council, it is clear that residents have significant concerns about the loss of local identity and representation.
<b>Representation</b>	Expansion would not benefit existing parishioners and reducing current councillor numbers while increasing electorate would undermine effectiveness.	Overall under the Draft Recommendations there would be an increase in the number of councillors from 8 to 14, with the 'new' electorate being served through the increased number of councillors.
<b>Lack of Synergy</b>	The areas of South Earlswood/Whitebushes have no schools, shops, or natural links to Salfords/Sidlow. They identify with Redhill and Reigate.	This view was made by local residents, including some from the affected area. The views of local people are important in determining community governance issues.
<b>Cost &amp; Bureaucracy</b>	Many view the move as a "money grab" or "another layer of bureaucracy" that contradicts the cost-saving goals of the new Unitary Authority.	In areas which have undertaken unitarisation previously, the role of parish councils has expanded (such as in Cornwall), and new parish and town councils have been created in areas without them. Parish level councils can provide much-needed local representation, particularly when unitary authorities have fewer councillors overall than the two layers they replace. Creating, expanding and reviewing parish and town councils remains an important part of local governance

		regardless of LGR. It appears, across the area, that some respondents felt that amending a parish or town council was unnecessary because LGR will keep both RBBC and the new Surrey councils, however through LGR the RBBC will be removed, which may lead to additional need for ensuring local communities are represented, including through creation of parish councils where appropriate.
--	--	---

*Of the 53 respondents indicating they **do** support the proposal:*

<b>Category</b>	<b>Summary of responses</b>	<b>Response</b>
<b>Representation</b>	Fixes the "anomaly" of South Earlswood and Whitebushes having no local-level representation; provides a voice for planning applications.	The creation of local representation through a parish council can take place without needing to be part of SSPC. However, this view clearly identifies the need for local representation and community voices.
<b>Community Cohesion</b>	Recognises the "natural boundary" created by footpaths (e.g., Dean Farm) and shared amenities like the local hospital and post office.	Whilst this is not universally agreed (see above), some residents clearly feel the newer areas are more closely aligned to Salfords than to Redhill and Reigate.
<b>Operational Logic</b>	Easier to expand an existing, well-run council than to create a new, inexperienced one; creates a "bigger pull" for resources and strategy.	There are benefits in larger councils, such as economy of scale. However, the important factors are the statutory criteria.
<b>Daily Life Links</b>	Residents already share schools, churches, and social hubs (Salfords Village Hall) across these proposed lines.	Whilst this is not universally agreed (see above), some residents clearly feel the newer areas are more closely aligned to Salfords than to Redhill and Reigate.
<b>Boundaries</b>	A few respondents suggested amendments to the boundaries, whilst being supportive overall,	The boundaries in the Draft Recommendations were necessarily defined along existing county division boundaries.

	noting the need to preserve local community identities.	Where they do not match local communities that could be amalgamated, it would suggest that joining them into a single parish may not be the best way forward.
--	---	---

Looking at local responses and the split between those in favour and those against:

Local area	In favour	Opposed
Whitebushes	60%	35%
South Earlswood	31%	59%
Salfords	27%	63%
Sidlow	2%	94%

*Do you support the proposal to name the parish 'Salfords, Sidlow and South Earlswood'?*

No	142
Not sure	26
Yes	53

Many of the responses to this question reflect the responses to the first; that is, respondents opposed to the proposed expansion were also opposed to the proposed name for similar reasons.

*If the proposal for South Earlswood and Whitebushes is not supported, which of the following options would you prefer?*

For the area to become a separate parish of 'South Earlswood & Whitebushes' served by 8 councillors	110
For the area to become part of a new Town Council with the Redhill Area (if that proposal is supported)	57
For the area to remain without a parish council representing them	49

Local area	Separate parish	Part of Redhill/Reigate	No parish council
Whitebushes	50%	25%	25%
South Earlswood	40%	38%	22%
Overall	43%	34%	23%

Here we have focused on the residents of Whitebushes and South Earlswood, as respondents from other parts of the borough are less able to represent the local voices of the communities in this area.

Verbatim comments from those answering that the area could become a separate parish of 'South Earlswood & Whitebushes':

- "Whilst my children are now adults, they attended Earlswood First School and Brambletye middles School before going onto Warwick Secondary. I myself grew up in Earlswood, initially moved to Meadvale before buying our house in South Earlswood and consider myself very much part of Earlswood rather than Salfords and most definitely not part of Sidlow. Whilst there is no obvious community in Earlswood, we do have a post office and there are social sites that I feel could be made more use of if people were more aware of them - I think being part of a Parish Council would enable this to happen if we had dedicated local councillors. I know Salfords and Sidlow parish council has very dedicated councillors currently."
- "My preference would be to have it more local and this would be workable as it is about the same size as the existing Salfords and Sidlow parish"
- "I feel being part of Redhill/Reigate wouldnt provide the right support for this area. I feel South Earlswood wouldn't get as much attention when competing with the much larger areas of Redhill and Reigate."
- "As previously stated. In this area we have a significant proportion of local issues and features that would require a parish council to work full time on. Being part of another existing parish just waters this down. Local representation for local residents. Its disappointing that we didnt have such a parish council setup in the first place."
- "I would really like Salfords North to become part of a parish with South Earlswood and Whitebushes but option has not been mooted. Whitebushes is in the catchment area of Salfords School which is in Salfords North. We have well used footpaths across land on our East which is in Salfords North. Perhaps the parishes should be redrawn..."
- "At least this would provide a more focussed group for teh immediate area rather than being swamped under a collective that will not prioritise individual areas sufficiently"
- "Whitebushes is 'out on a limb, sitting between Redhill & Horley, and is not part of Redhill. It would be helpful for the area to have its' own identity and representation. My view is that it aligns best with Salfords, not Redhill or Earlswood. The lack of amenities on the estate means residents have to use those to the north or south, so tend to gravitate either way."
- "Logically Sidlow shoud be linked to Woodhatch or to Horley as shown above You may wish to dig out the paperwork of the work done about 2003 if it has been kept."

Comments from those answering that the area could become part of a new Town Council with the Redhill Area:

- "Far better for continuity and given the history and significance of earlswood and the hospital to Redhill."
- "I feel more a part of Redhill town and Earlswood as a "suburb""
- "I feel that it would be better to have a greater representation with a town council."

- “I think without a parish council as we are on the edge we get forgotten. A parish council with 8 councils will be too small, and without the power of a bigger one parish council”
- “Prefer either South Earlswood & Whitebushes stand alone council, or inclusion within Redhill. Connections to Redhill are more meaningful and transport links etc should be viewed from an Earlswood-Redhill point of view.”
- “Same as above, South Earlswood is linked with the main town and it makes sense to establish a better connection. Again, schools, shops etc are in the Reigate and Redhill area, not Salfords.”
- “This is dependant on if Redhill goes ahead that would be fall back option one If that fails then the Eastwood and Whitebushes idea makes a lot of sense potentially incorporating all of Earlswood”
- “We are in Redhill. Full stop.”

Comments from those answering that the area could remain without a parish council:

- “Home owner, from a working family, does not support the additional red tape, cost and limitations to freedom a parish council will impose.”
- “I do not think that parish councils necessarily provide value for money. I would hope that there would still be provision for locally-elected representatives to make representations at whatever new tiers of local authorities are rolled out from the review.”
- “I don’t believe that South Earlswood will be well served by merging solely with Whitebushes, as it’s is predominantly managed by the local council / housing associations, so feel any parish will be overuled by those authorities and so won’t serve the best interests of South Earlswood. South Earlswood is too far out of Redhill town to be well served by becoming part of a town council with them. I feel we will largely be ignored, being right on the border of the proposed area.”
- “Shopping - Redhill, Reigate, Crawley”
- “The Parish Council model is not suitable for this area. It is also a needless expense.”
- “Unnecessary additional layer of bureaucracy”
- “we do not need more councillors at extra cost”
- “Why change what is working?”

*If you have any other comments about this area, please tell us here.*

The comments made in this are largely reflected responses to the previous questions.

### **Considerations**

Overall, there is strong opposition to expanding, and insufficient evidence to support the expansion into Whitebushes and South Earlswood, including from people in that community. Whilst this was originally proposed by the parish council, it is clear that residents have significant concerns about the loss of local identity and representation. On balance, it appears that expanding SSPC is not supported and does not reflect local interests and identities. There are also concerns that it would adversely affect effective and convenient local governance.

However, it is important that Whitebushes and South Earlswood don't become isolated with no local representation, if other areas end up with a parish or town council. Taking the views of local residents into account, there are clearly a range of views expressed.

Residents from Whitebushes and South Earlswood indicated a preference for having a parish council of some form (77% compared to 23% against). Support was split between the two options - creating a separate parish (43%) or becoming part of the Redhill/Reigate council area (34%), with a low number of responses from these areas. The key question is which of the options would best meet the statutory criteria. From the responses received, it appears that there are concerns about being a small part of a larger Redhill/Reigate council and perhaps being underrepresented; equally there are concerns about not being represented locally at all, or of being a small parish that has little say over local matters. Some respondents did not wish to be part of a parish at all, largely for reasons outside of a CGR (costs and layers of representation). Therefore, given the broad support for ensuring local areas have local representation following LGR, it appears the most appropriate choice is between having a new separate parish council for this area, or joining it within Redhill & Reigate area. Given that there are economies of scale with larger councils, and the ability to share capacity and skills across the parish area, joining this area with Redhill & Reigate would lead to more effective and convenient local government. In addition, creating this area as a separate parish ward of the new council would enable local representation and alignment with the interests and identities of local communities.

### **Final Recommendations**

No changes to Salfords & Sidlow parish are proposed.

## 51. North of the borough (Banstead and surrounding villages)

### Electorate and current arrangements

The area is expected to have a total projected electorate in 2030 of 40,229 electors. It is currently unparished.

### Draft Recommendations

- DR/6 Create a new parish of Banstead, served by a parish council, with wards: Banstead (4 councillors), Woodmansterne & Chipstead (2), Nork (4), Tattenham Corner (3), Preston (1), Hooley & Netherne (1), Kingswood (2), Tadworth & Walton (3), and Lower Kingswood & Mugswell (1).
- DR/7 The name of the new parish serving the north of the borough should be called Banstead & The Villages Council.

### Consultation responses

A total of 804 responses were received.

*Do you support the proposal to create this new parish as listed above?*

No	182
Not sure	105
Yes	517

*Of the 182 respondents indicating they do not support the proposal:*

Category	Summary of responses	Response
<b>Bureaucracy &amp; LGR</b>	Move to a Unitary Authority (East Surrey) was promised to "de-layer" government. Creating a new parish council adds a redundant layer and reverses the goal of efficiency.	Parish and town councils continue to have a role post-LGR to serve local communities and represent local people.
<b>Financial Burden</b>	Concern over an uncapped precept (extra tax) during a cost-of-living crisis. Many feel they are paying more for "diluted" representation.	There is a cost associated with a new parish or town council. However, the apparent alleged lack of service provision from other tiers of government do not affect the role of parish councils and do not impact on a CGR.
<b>Scale &amp; Identity</b>	At ~50,000 people, the parish is too large to be local. Rural villages feel they will be	Local parish wards will help ensure representation for local communities, whilst a larger council overall will give

	"outvoted" by the more densely populated urban wards.	economies of scale and financial security. Whilst there may be different needs between urban and rural areas, parish councils jointly represent local people and collectively make decisions. Different wards ensure local voices are heard and represented.
<b>Representation Inequity</b>	The distribution of councillors is seen as unfair. High-density areas feel they are being "segregated" or under-represented.	The ratio of electors to councillors is balanced, as far as possible, to deliver equality of representation.
<b>Effectiveness &amp; Power</b>	Parish councils are viewed as "talking shops" with no real power over planning or major services, making them a "fake mirage of democracy."	Planning decisions will move to the unitary authority, and unitary councillors will represent large local areas; this is already determined by LGR. A parish council would be a statutory consultee, providing a local voice to represent local people in their smaller communities. As now, local people can continue to make representations to a planning application. Therefore, whilst the parish council is a statutory consultee and not a decision maker for planning, the creation of a parish council actually increases local representation on planning matters.
<b>Community Links</b>	The proposed boundaries ignore existing social habits, school catchments, and Residents' Associations (RAs).	Parish wards are proposed based on communities and current county divisions. In time, if this new parish council is put in place, these can be reviewed and revised as the parish council settles into its role and any new developments are built out, to ensure ongoing local representation.
<b>Previous experiences</b>	Previous experience of poorly managed local councils.	Every parish and town council is different, and are variably effective. The local electorate have a role in holding their elected representatives to account.

<b>Council tax</b>	“Our band G Council tax high enough without additional fee to pay. All bands need reviewing as very unfair ... So due to extra charge, sadly no to local councils.”	Council Tax reorganisation is outside of the remit of a CGR. Whilst band G properties pay higher council tax and, therefore, higher precepts for parish councils, that is based on the current legislation for local taxation based on property values.
<b>Church involvement</b>	One respondent did not agree with “parish church run led councils [sic]”	Parish and town councils are not linked to the church in any way, but are part of local administrative democracy.

*Of the 517 respondents indicating they do support the proposal:*

<b>Category</b>	<b>Summary of responses</b>	<b>Response</b>
<b>Democratic Deficit</b>	Transitioning to a Unitary Authority significantly reduces the number of councillors. Residents feel a Parish Council is "vital" to restore lost representation and accountability.	LGR will remove RBBC, and potentially result in a loss of local representation that a local parish council can help address. If a new parish council is created, it will be to serve local communities.
<b>Planning &amp; Green Belt</b>	Parish councils are statutory consultees in planning. Residents want a formal body to protect the Green Belt, Banstead Commons, and open spaces from over-development.	Parish councils are consultees in planning, ensuring a local voice is represented in planning decisions.
<b>Local Knowledge</b>	Residents want representatives who "live in the area" and understand hyper-local issues like the 166 bus service, local GP access, and village parades.	Councillors are local people, elected by their local community to represent them.
<b>Unified Voice</b>	A larger Parish (40,000+ electorate) provides "more weight" and "clout" when negotiating with the East Surrey Unitary Authority.	The area north of the M25/North Downs is seen as distinct from Reigate/Redhill to the south, with similar village character, geography and everyday activities forming a natural grouping.
<b>Social &amp; Economic Links</b>	The villages are already "homogeneous" and share schools, shops (Banstead High	These comments support the creation of a council to cover the broad area north of the M25.

	St), and community hubs like Village Halls and allotments.	
--	--	--

*Do you support the proposal to name the new parish 'Banstead and The Villages'?*

No	221
Not sure	125
Yes	457

Whilst many respondents supported the proposed name, noting it represents their community (including residents from Nork – the other large town in the proposed parish), others felt it did not reflect the identities of every part of the parish.

Alternative suggestions are below. As these were not consulted upon directly, there was no 'vote' or opportunity for respondents to indicate support for suggestions made by others:

- Banstead & North Downs
- Banstead & the Commons
- Banstead & the North Downs
- Banstead and Adjacent Villages
- Banstead and District
- Banstead and District Parish Council
- Banstead and Neighbourhood
- Banstead and North Downs
- Banstead and surrounding villages
- Banstead and Villages
- Banstead Community Parish Council
- Banstead District Council
- Banstead North Downs
- Banstead Parish
- Banstead Parish Council
- Banstead Urban
- Banstead Urban District Parish Council
- Banstead Villages
- Banstead and Tadworth
- Beanfield Parishes
- Banstead and North Surrey
- Epsom Downs and the villages
- Greater Banstead
- Kingswood and Burgh Heath
- Langley Vale 'moot'
- North Borough Parish Council
- North Downs Parish Council
- North East Surrey Parish Council
- North Reigate & Banstead Parish
- North Surrey Parish Council
- North Surrey Villages
- Parish of Woodlands & Downs
- Tadworth and it's neighbours

- The Copthorne Hundred
- The Heaths
- The Villages

Suggestions including the word 'District' should be avoided to prevent confusion as the 'district' is RBBC (being abolished under LGR). Some respondents felt that reference to 'The Villages' implied a hierarchy of communities within the council area. Some felt the natural landscape is what unifies the distinct wards of the proposed parish area. As a result, they felt that *North Downs* or *The Commons* were more appropriate names. However, 56% of respondents who gave a view about the proposed parish supported the name *Banstead & The Villages*.

*If you have any other comments about this area, please tell us here.*

The comments made in this largely reflect responses to the previous questions. In addition, respondents highlighted additional specific concerns. These included:

- Concerns that Burgh Heath is not included in a ward name - *it is not possible to include every community within a name and Burgh Heath is not currently part of a ward or electoral division name.*
- Concerns that single member parish wards may not lead to effective local governance – *this can be addressed to ensure no single member wards on the parish council as part of this review.*
- Concerns about bus services and traffic – *these are outside the remit of a CGR.*
- Concerns that the first stage consultation gave too much weight to specific respondents who do not represent the views of residents – *the initial consultation was used to shape the Draft Recommendations, which have then been consulted upon and the feedback from such has been presented in this report in developing the Final Recommendations. No individual or group has been given greater weight than any other.*
- One respondent suggested creating a Local Residential Association instead of a parish council, noting it would take considerable time and cost to set up and determine rights, responsibilities and election processes – *a new parish council already has the legal requirements in place for democratic elections and statutory rights and responsibilities. In addition, non-statutory membership-based voluntary bodies are not always representative of local people in an equitable and democratic way.*

The Tadworth & Walton Residents' Association (TWRA) made a submission to the consultation.

TWRA support the Draft Recommendations, and set out their reasons for doing so in their submission. They have raised concerns about the distribution of parish councillors to wards of the proposed new council, and made some suggestions. These have been considered, alongside the other submissions made.

In essence, the number of electors to councillors in each ward should be as equitable as possible between the different wards of the parish. This is measured using the variance (the difference in the elector:councillor ratio for a given ward compared to the parish total).

In the three options suggested by TWRA, at least 6 of the 9 wards have a variance of more than  $\pm 10\%$ , and two of the suggestions give at least one ward with a variance of more than  $\pm 30\%$ .

TWRA also comment on the proposed name for the parish, noting concerns raised by their membership. Their preference is for *Banstead and District Parish Council* which is not possible as the parish is not a district level council and this is likely to cause confusion, or *Banstead Area Community Council*.

They felt, along with some individual responses, that Kingswood ward should be called Kingswood & Burgh Heath, which reflects both parts of this community.

Finally, TWRA comment on the process for establishing the new parish council, noting that Residents Associations may have a valuable role to play in the creation of the council and setting initial precepts. This is outside of the remit of the CGR. Whilst the RAs undoubtedly have experience and local knowledge relevant to representing and supporting their local communities, the mechanism is for the principal authority local members to become the interim members of the parish council to establish the initial precept, with democratic elections taking place in May 2027. Residents Associations do not have a formal or direct role in the new parish council.

## **Considerations**

Overall, the view that there should be a new parish council is not unanimous, although supported by 65% of those responding. However, many of the objections are due to the anticipated intention that LGR should remove local councils, and that there will be an increase in cost through the parish precept. Whilst some respondents felt that the proposed parish would not be able to represent the diverse communities within it, other respondents welcomed the creation of a large parish with diverse communities and different needs. Supporters of the proposal expressed how local representation was important, particularly in light of LGR, and how the proposal effectively represents the local communities. Geographically, there is no clear balance of views in specific areas with respondents supporting and opposing the proposal spread throughout the proposed parish area.

The statutory criteria appear to be met by this proposal – through effective and convenient local government, and by representing a range of communities through local parish wards.

On balance, it appears that creating a new parish council is the most appropriate option for this area.

Some of the concerns focused on the warding arrangements and balance of representation within wards, with respondents seeking to avoid single member parish wards where possible. However, this is balanced against the need to ensure parish wards reflect local interests and identities and are aligned with local communities. The cross-party Member Working Group discussed these options at length, identifying the following as the most suitable fit that combines the desire to reduce the number of single member wards against the need for local community representation and electoral equality as far as this is possible.

Following further consideration of the Draft Recommendations and the responses received, a number of amendments were proposed to adjust the proposed wards, ward names and numbers of councillors to best reflect local identities and interests, with the overall number of proposed parish councillors increasing from 21 to 27.

These included: the division of the proposed Banstead ward into Banstead Village West and Banstead Village East wards, with 2 and 3 councillors respectively, increasing the number of councillors for the proposed Preston ward from 1 to 2, renaming the proposed Kingswood ward to Kingswood and Burgh Heath, increasing the number of councillors for the proposed Lower Kingswood and Mugswell ward from 1 to 2, and increase the number of councillors for the proposed Woodmansterne & Chipstead ward from 2 to 3, and increasing the number of councillors for Hooley & Netherne ward from 1 to 2.

Consideration was given to dividing the proposed Nork ward into Nork East and Nork west, with 3 and 1 councillors respectively, and Tadworth & Walton ward into Tadworth and Walton-on-the-Hill wards, with 3 and 1 councillors respectively; however, the Member Working Group felt that avoiding single member parish wards where possible was beneficial in ensuring ongoing local representation in case of the absence of one individual, so preferred to keep these larger wards served by 4 councillors each.

These changes were considered to be consistent with the responses considered and to support the criteria of representing local identifies and interests and effective and convenient local government.

Parish ward	Electorate: 1 May 2030	Number of councillors	Elector:Cllr ratio (variance)
Banstead Village West	2401	2	1201 (-19%)
Banstead Village East	4682	3	1561 (+5%)
Nork	7410	4	1853 (+24%)
Tadworth & Walton	5855	4	1464 (-2%)
Preston	2847	2	1424 (-8%)
Hooley & Netherne	2021	2	2021 (-32%)
Kingswood & Burgh Heath	3790	2	1895 (+27%)
Lower Kingswood & Mugswell	2453	2	1227 (-18%)
Tattenham Corner	4625	3	1542 (+3%)
Woodmansterne & Chipstead	4145	3	1382 (-7%)
<b>Banstead &amp; The Villages total</b>	<b>40229</b>	<b>27</b>	

Although there was not unanimity on the choice of name, over half of those who responded did agree with the proposed name. As noted above, several of the alternative names cannot be used.

### Final Recommendations

R/3	Create a new parish of Banstead & The Villages, served by a Parish Council called <b>Banstead &amp; The Villages Council</b> , with wards: Banstead Village West (2 councillors), Banstead Village East (3), Nork (4), Tadworth & Walton (4), Preston (2), Hooley & Netherne (2), Kingswood & Burgh Heath (2), Lower Kingswood & Mugswell (2), Tattenham Corner (3), Woodmansterne & Chipstead (3).
-----	---

## 52. South of the borough (Redhill and Reigate area)

### Electorate and current arrangements

The area is expected to have a total projected electorate in 2030 of 47,055 electors. It is currently unparished.

### Draft Recommendations

- DR/8 Create a new parish of Redhill & Reigate served by a Town Council, with wards covering the current County Divisions: Redhill East (2 councillors), North Earlswood (3), South Park & Woodhatch (3), Redhill West (3), Meadvale & Hatchlands (2), Reigate (3), Chartfield (2), and Merstham (3).
- DR/9 The name of the new parish serving the areas of Redhill & Reigate should be called Redhill & Reigate Town Council.

### Consultation responses

A total of 995 responses were received.

#### *Which of the proposals listed do you support?*

I do not support any of these proposals	161
I support the proposal to create a new single parish council to cover Redhill and Reigate	320
I would prefer two separate parish councils (one for Redhill and one for Reigate)	479
Not sure	35

Whilst this is not a referendum but a consultation, 80% of respondents supported some form of parish/town council governance in the area. Overall, 72% of respondents from Redhill and 88% of those from Reigate supported some form of parish/town council governance in their town.

#### *Of the 161 respondents indicating they do not support any of the proposals*

Category	Summary of responses	Response
<b>Financial burden</b>	Residents argue that in a cost-of-living crisis, adding a "stealth tax" for no clear service improvement is unacceptable.	There is a cost associated with a parish or town council. However, local councils provide important local services and ensure local democratic representation, particularly following LGR.
<b>Bureaucracy</b>	Residents point out that the goal of Local Government	In areas which have undertaken unitarisation previously, the role of

	<p>Reorganisation (LGR) was to simplify governance. Adding a Parish tier is seen as "re-inserting" the layer that was just removed.</p>	<p>parish councils has expanded (such as in Cornwall), and new parish and town councils have been created in areas without them. Parish level councils can provide much-needed local representation, particularly when unitary authorities have fewer councillors overall than the two layers they replace. Creating, expanding and reviewing parish and town councils remains an important part of local governance regardless of LGR. It appears, across the area, that some respondents felt that amending a parish or town council was unnecessary because LGR will keep both RBBC and the new Surrey councils, however through LGR the RBBC will be removed, which may lead to additional need for ensuring local communities are represented, including through creation of parish councils where appropriate.</p>
<b>Cynicism / Trust</b>	<p>Accusations that the proposal is a "power grab" by existing borough councillors to retain their titles and influence after their current roles are abolished.</p>	<p>Parish and town councillors are democratically elected by local residents. There is no automatic position provided to existing borough or county councillors on a new local council.</p>
<b>Lack of Real Power</b>	<p>Scepticism that parish councils have any "actual clout." Critics call them "talking shops" or "NIMBY" groups that cannot overrule the Unitary Authority on major issues like planning or potholes.</p>	<p>Parish councils are statutory consultees on certain aspects of local administration, including planning issues. They also have a representative and reporting responsibility, just as the Borough Council do, on concerns that are outside of their remit such as potholes.</p>
<b>Duplication of Work</b>	<p>Arguments that the new East Surrey Council should be given 3–5 years to "bed in" before determining if a local tier is needed. Many believe Residents' Associations already perform this role at no cost.</p>	<p>Other residents through the consultation have expressed concerns about the role of residents' associations, which are not statutory bodies and do not have democratically elected representatives.</p>
<b>Identity &amp; Boundaries</b>	<p>Specific concerns that boundaries split natural</p>	<p>The Earlswood and Whitebushes area is now proposed to move</p>

	<p>communities (e.g., Earlswood from Whitebushes, or Merstham from its parliamentary links). Objections to Reigate postcodes (RH2) being merged into Redhill wards.</p>	<p>into the Redhill &amp; Reigate council(s) area. A CGR cannot consider the parliamentary constituency boundaries when determining local governance arrangements. However, in this case the community links between Merstham and Redhill appear to be stronger than to other parts of their constituency.</p>
--	---	--

<i>Of the 320 respondents indicating they support a new single parish council</i>		
<b>Category</b>	<b>Summary of responses</b>	<b>Response</b>
<b>Economic Efficiency</b>	<p>Economies of Scale: Residents believe a single entity will reduce administration, staffing, and resource costs compared to running two separate offices. It is seen as a way to keep the proposed precept (Council Tax) to a minimum.</p>	<p>There are economies of scale with larger parish/town councils, although both Redhill and Reigate will be relatively large standalone councils if created.</p>
<b>Social Cohesion</b>	<p>Complementary Towns: Reigate is valued for its "charm and aesthetics," while Redhill provides "essential utility" (mainline station, hospital, major retail, and the new cinema/leisure complex). Residents view them as a single lived environment.</p>	<p>Unsurprisingly, there are differences of opinion amongst respondents. Some felt the two towns are a cohesive single lived environment, whilst highlighting differences between them, and others felt they were distinctly different towns.</p>
<b>Equity &amp; Investment</b>	<p>Preventing a "Them vs. Us" Divide: There is a significant fear that two councils would "exacerbate existing inequalities," leaving Redhill (and Merstham) as the "poor relations" while Reigate remains insular and affluent.</p>	<p>As above, there are a range of opinions expressed on this topic, and there is a need to balance the opposing views against the statutory criteria.</p>
<b>Governance Weight</b>	<p>A Stronger Voice: A single council representing a larger population is expected to "carry more weight" when negotiating with the new East Surrey Unitary Council or the County level.</p>	<p>A single large council has a role in representing the voices of local residents to the new unitary authority, although two separate councils each have equal representative roles in their area</p>

		on matters relevant to their communities.
<b>Administrative Logic</b>	The "Artificial Boundary" Problem: Many residents live on the zigzagging border (e.g., Meadvale, Carlton Road, and Doran Drive) where neighbours have different postcodes. A single council avoids the confusion of having different rules on opposite sides of a street.	There is no clearly defined boundary between the two towns, and residents living in the area may be split between the two council areas based on an artificial boundary.
<b>Historical precedent</b>	Several long-term residents noted that the towns were successfully run together for decades and that the "Victorian railway era" effectively merged them into one economic unit over 100 years ago.	There are differences of opinion amongst respondents. Some felt the two towns are a cohesive single lived environment, whilst highlighting differences between them, and others felt they were distinctly different towns.

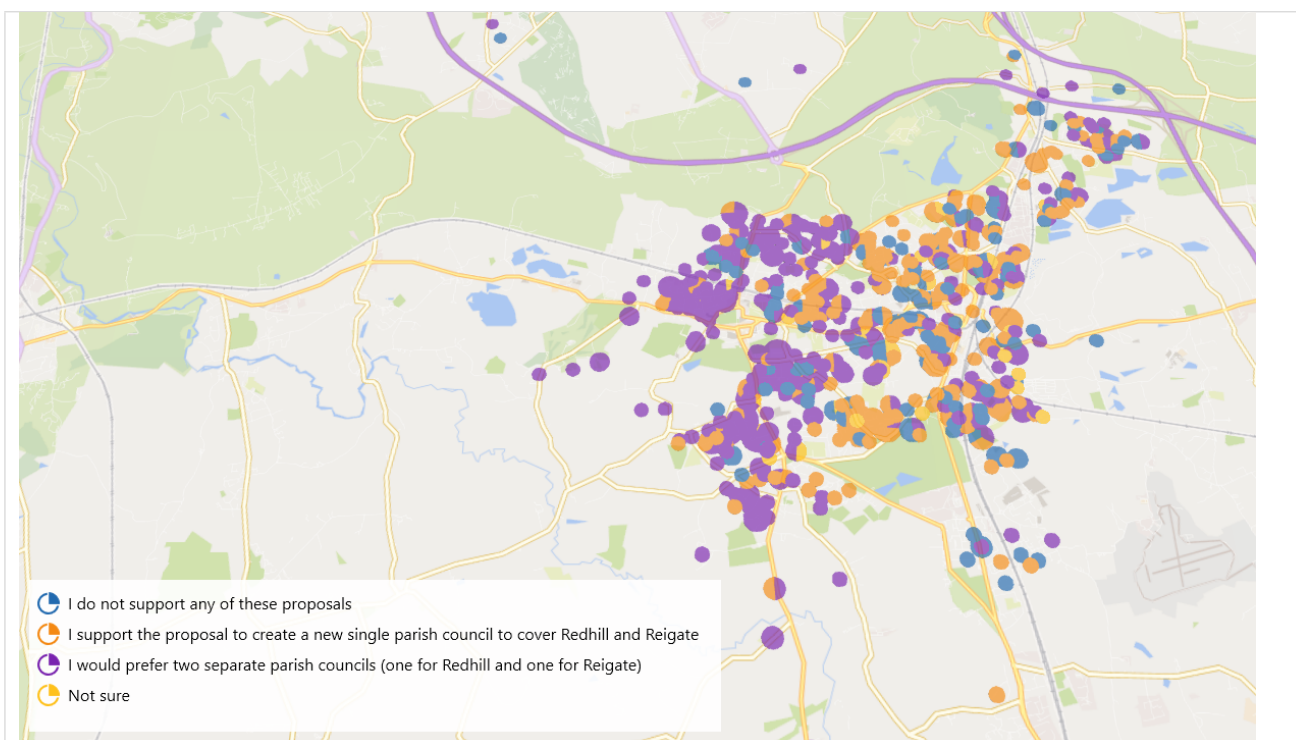
*Of the 479 respondents indicating they support two separate parish councils*

<b>Category</b>	<b>Summary of responses</b>	<b>Response</b>
<b>Identity &amp; Character</b>	Distinct "Vibes": Reigate is characterised as an "ancient market town" with independent shops, historical conservation areas, and a rural feel. Redhill is viewed as a "modern transport hub" with high-density development and a transitional commuter population.	As noted above, some residents felt the two towns are distinct with different characters and identities. This does not preclude them being served by the same single council, but is a factor in how that council is represented through wards.
<b>Representation &amp; Focus</b>	Localised Decision-Making: Smaller councils allow representatives to be "passionate experts" on their specific streets. Large councils risk members voting on areas they have no personal interest in or knowledge of.	In contrast to the 'large single council' approach and economies of scale, some respondents feel smaller councils give more local views.
<b>Socioeconomic Needs</b>	Demographic Differences: Commenters noted that Redhill requires a focus on regeneration, high-density housing, and transport, while Reigate focuses on Green Belt	As above, regarding Identity & Character, there are a range of opinions on differences in needs across the areas. As identified in that response, this does not preclude them being served by

	protection, independent commerce, and low-density planning.	the same single council, but is a factor in how that council is represented through wards.
<b>Financial Transparency</b>	Resource Allocation: There is a recurring concern (from both sides) that a joint council would skew funding. Reigate residents fear being a "cash cow" for Redhill's development, while Redhill/Merstham residents fear being the "poor relation" ignored in favour of "jewel-in-the-crown" Reigate.	There is no certainty that this would happen, but it appears to be a genuine concern from residents in both areas.
<b>Accountability</b>	Direct Control: Residents believe it is easier to hold a council accountable when it is smaller and geographically focused.	In contrast to the 'large single council' approach and economies of scale, some respondents feel smaller councils give more local views and can be held to account. In contrast, the process to hold local councillors to account is the same whether it is a small or large local council.

There are apparent differences in preference between the different areas:

Lives in...	Single council	Separate councils	Total supporting a parish/town council	Number of responses
Redhill	46%	27%	72%	279
Reigate	18%	70%	88%	388
Merstham	41%	35%	77%	82
<b>All of the above</b>	<b>31%</b>	<b>50%</b>	<b>81%</b>	<b>749</b>



*Do you support the proposal to name the new single parish 'Redhill and Reigate' ?*

No	69
Not sure	47
Yes	300

Reasons against focused mainly on the order of the names, although convention usually places them in alphabetical order when they are fairly equally sized. Others felt that Merstham should be included in the name

*Do you support the proposal to name the new parishes as 'Redhill Town Council' and 'Reigate Town Council' ?*

No	41
Not sure	50
Yes	452

Reasons against focused on including Merstham in the name; others felt that the word 'Town' was not needed for one or both councils.

*If you have any other comments about this area, please tell us here.*

Most of the comments repeated points raised above. Some respondents wanted guaranteed protection for local community assets, and the repurposing of vacant buildings to community hubs (such as the Reigate Priory). Others felt a parish council was essential

in order to ensure local services continued and assets were retained for the local residents. Finally, some felt that Merstham could only be represented by a dedicated Redhill/Merstham council and not a broader combined council where they would be a smaller voice. Interestingly, of residents in Merstham responding, 34 prefer a single council compared to 29 wanting separate parish councils.

## Considerations

Whilst this is not a referendum, around 50% of respondents prefer two separate councils compared to 31% wanting one single combined council. However, there is a clear difference in views between the two towns.

The residents near the boundary tended to feel that a combined council would be simpler and easier to navigate and understand. However, respondents felt it was important that smaller communities were represented appropriately and that this was best done by two councils instead of one.

Sentiment in the Earlswood and Whitebushes areas, which it is proposed to include within the parish governance arrangements for the Redhill and Reigate area, also expressed some support for smaller, more local councils.

The key question is the statutory criteria – does either option represent local interests and identities more fully than the other, and does either give rise to effective and convenient local government more fully. In reality, there is a fine balance in the views expressed, with different respondents advocating for either option. The area near to the boundary line appears to be most at risk of not having effective or convenient local government as the line between the two towns is unclear and variable.

On balance, it appears that two separate town councils may be the best option, despite the concerns raised by local people. It will remain important for all residents to be properly and fully represented by their new town councillors. There remains scope for two separate town councils to work collaboratively on issues broader than their immediate community. The separation into two areas also allows them to work independently to support and serve their local communities, and recognises the different historical backgrounds and political representation of the areas; this helps ensure local needs are identified and considered by the local council in a fair and equitable way.

As noted above, the South Earlswood and Whitebushes communities will be part of Redhill Town Council area within the proposed recommendations. This affects the Draft Recommendation wards, with the proposed wards below following Unitary Authority boundaries. The total number of councillors is based on NALC recommendations, and adjusted to ensure improved electoral equality between Town wards.

Redhill Town wards	Electorate: 1 May 2030	Number of councillors	Elector:Cllr ratio (variance)
Redhill Central	2676	2	1338 (+12%)
Redhill East	3594	3	1198 (0%)
Redhill North	6326	5	1265 (+6%)
Merstham North	1205	1	1205 (+1%)
Merstham Central	3496	3	1165 (-2%)
Merstham South	1992	2	996 (-17%)
Meadvale & Hatchlands	4427	4	1107 (-7%)

North Earlswood	4973	4	1243 (+4%)
Earlswood & Whitebushes	3579	3	1193 (0%)
<b>Redhill total</b>	<b>32268</b>	<b>27</b>	

Reigate Town wards	Electorate: 1 May 2030	Number of councillors	Elector:Cllr ratio (variance)
Pilgrims	4511	5	902 (-7%)
Priory	3843	4	961 (-1%)
Chartfield	3126	3	1042 (+8%)
Woodhatch	2738	3	913 (-6%)
South Park	4148	4	1037 (+7%)
<b>Reigate total</b>	<b>18179</b>	<b>19</b>	956.8

## Final Recommendations

R/4	Create a new parish of Redhill served by a Town Council called <b>Redhill Town Council</b> with the following town wards: Redhill Central (2 councillors), Redhill East (3), Redhill North (5), Merstham North (1), Merstham Central (3), Merstham South (2), Meadvale & Hatchlands (4), North Earlswood (4), Earlswood & Whitebushes (3)
R/5	Create a new parish of Reigate served by a Town Council called <b>Reigate Town Council</b> with the following town wards: Pilgrims (5 councillors), Priory (4), Chartfield (3), Woodhatch (3), South Park (4).

## Options

- 53.** Now the CGR process has commenced, the Council is required to follow it to its conclusion. Each of the Final Recommendations have been discussed by the cross-party Member Working Group, taking consultation responses into account.

## Legal Implications

- 54.** The Local Government and Public Involvement in Health Act 2007 (Part 4) devolved power from the Secretary of State to principal councils to carry out community governance reviews and put in place or make changes to local community governance arrangements.
- 55.** The Community Governance Review has been undertaken in accordance with this Act and published guidance.
- 56.** As part of the process of Local Government Reorganisation, a Structural Change Order came into force on 10 March 2026.
- 57.** There is a complex interaction of transitional arrangements and regulations that are engaged when Local Government Reorganisation and Community Governance Reviews are being conducted at the same time:

- Local Government (Structural Changes) (Transitional arrangements) Regulations 2008 (Regulation 7)(SI 2008/2113)
  - Local Government and Public Involvement in Health Act 2007
  - Surrey (Structural Changes) Order 2026
- 58.** With the Structural Change Order (SCO) being in force, this interaction of transitional arrangements mean the legal power to complete the Community Governance Review Order sits with the successor council.
- 59.** With the SCO in force, the transitional period has begun. In these circumstances, Regulation 7 of SI 2008/2113 reserves the making of the CGR Order to the successor council.
- 60.** It is Regulation 7 of SI 2008/2113 and the transitional arrangements for both Community Governance Review and Local Government Reorganisation, which shifts the legal power to the successor council.
- 61.** This Council has discussed these legal implications with its external independent CGR legal advisor.
- 62.** To progress any agreed final recommendations, there will need to be discussions between this Council and the Shadow Authority (once it is constituted).
- 63.** Full Council should consider and vote on the final recommendations of the Community Governance Review and provide these recommendations to the successor council for them to implement.
- 64.** It is considered that, with the SCO now in force, the Council does not have the legal power to complete the Community Governance Review Order. If the Council did so, there would be a risk of the Council making an unlawful decision subject to legal challenge. This Council's Community Governance Review has already followed as compressed a timeline as possible whilst remaining compliant with its own consultation policy and all requirements of relevant legislation and guidance. Any further compression of the process would have risked compromising the review and opened the Council to risk of legal challenge through Judicial Review.

## Resource Implications

- 65.** The staged process for the review means that there will be peaks and troughs in work demand, making the engagement of temporary staff impracticable. There are clear advantages, in terms of maintaining continuity and consistency in processes, to having a fixed team undertaking and overseeing the whole review process.
- 66.** To implement the outcome of the Review, the successor council will be required to complete the Reorganisation Orders with accompanying maps, and widely publish these changes.
- 67.** The Orders will include implementation dates and electoral arrangements. Depending upon the complexity of the proposals, this may have a resource implication for services, including but not exclusively legal, property, HR, electoral services and GIS.
- 68.** Lastly, the establishment of new parishes will impact upon other services across the council, including finance, council tax, planning, electoral services, and the Monitoring Officer responsibilities.

## Financial Implications

69. A separate application and funding strategy for additional resources will need to be established to meet the post review stages of this project. At this stage it would be unreliable to estimate this value as it is very much dependent on the outcome of the first four stages.

## Equalities Implications

70. In line with the Public Sector Equality Duty, public bodies must, in the exercise of their functions, give due regard to the need to eliminate discrimination, harassment, victimisation, to advance equality of opportunity and foster good relations between those who share a protected characteristic and those who do not.
71. It was assessed that a review of community governance would not impact on the requirement of the Public Sector Equality Duty.
72. A review of the equality implications of the recommendations of this report has been conducted and is attached to this report at Annex 7. The Member Working Group considered the potential implications raised by the review.
73. Parish and Town Councils are the most local tier of government in England and play an important role in terms of community empowerment at a local level. A CGR offers an opportunity for both existing parishes and local people to feed into this process and offer proposals for any changes.

## Communication Implications

74. To ensure public awareness and engagement in the Council's public consultation activity, the Council has prepared a Communications Plan, which is informed by best practice examples of similar reviews undertaken by other local authorities and Government guidance. These plans will be reviewed periodically at each stage of the CGR process.

## Environmental Sustainability Implications

75. There are no environmental sustainability implications arising from this report.

## Risk Management Considerations

76. The CGR Project Board will regularly assess and record risks and take all necessary steps to mitigate those, as set out within this report. The most significant risks to this review are detailed under the sections within this report relating to 'Communications implications', 'Local Government Reorganisation considerations', and 'Resource implications'.
77. If insufficient funding is allocated to this review, as set out under the 'Financial implications' section, then this may present further significant risks to the successful delivery of the review such as lack of due consultation and potential legal challenge.

## Procurement/Contract Management and Subsidy Considerations

78. There are no procurement/contract management and subsidy considerations arising from this report.

## Local Government Reorganisation Considerations

79. The timetable of this Community Governance Review is being undertaken at the same time as Local Government Reorganisation in Surrey. Both issues will therefore be competing for limited resources whilst the Council remains responsible for the delivery of statutory services and business as usual activity. Some aspects of the work associated with a CGR has been outsourced to consultants and specialist suppliers.
80. The Governance, Civic and Electoral Services Manager will continually review resourcing and workloads throughout the project and may utilise the approved budget to take any necessary steps to ensure the review is conducted in an effective and timely manner.
81. The Local Government Boundary Commission for England has no direct involvement in the timing and scope of CGRs as part of local government reorganisation. However, when they commence a full electoral review of newly established unitary authorities, they require the authority under review not to conduct a concurrent CGR as this can cause confusion. The timing of this CGR, as set out under Appendix A, has not conflicted with the work of the LGBCE.

## Other Implications

### Human resources implications

82. There are no direct human resource implications arising from this report; however, the post-review stages of the project could potentially include requirements for recruitment or related activity to support effective implementation.
83. Where staff are recruited to support implementation, or in the event of future decisions around provision of services involving parish councils, these might require the transfer of Reigate & Banstead Borough Council staff under the TUPE regulations. Should these arise, they will be considered as part of post-review implementation and associated decisions.

## Consultation

84. The Community Governance Review has included two phases of public consultation. In doing so, the Council has followed the Gunning Principles:
- **proposals are still at a formative stage:** a final decision has not yet been made, or predetermined, by the decision makers.
  - **there is sufficient information to give 'intelligent consideration':** the information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response.
  - **there is adequate time for consideration and response** – there must be sufficient opportunity for consultees to participate in the consultation.

- **‘conscientious consideration’ must be given to the consultation responses before a decision is made** - decision-makers should be able to provide evidence that they took consultation responses into account.

**85.** Each of the two phases of public consultation have followed the Council’s consultation procedures, allowing at least eight weeks for any public consultation activity. This has ensured adequate time for consideration and response of representations.

**86.** As identified within this report, where concerns were raised during the process of the consultation, these were addressed and steps taken to ensure that the consultation was consistent with all appropriate process and guidance.

## Policy Framework

**87.** The Community Governance Review supports the Council’s Corporate Plan for 2025-2030, including:

- Theme 1: Enabling our communities to thrive
- Priority 1.1: Great places to live and work
- Objective 1.2.1: Strong, inclusive communities
- Objective 1.4.1: The opportunity to shape and influence our services

## Background Papers

1. Council report, 18 June 2025 – [Community Governance Review](#)
2. Council report, 6 November 2025 – [Community Governance Review Draft Recommendations](#)

## Annexes

Annex 1 – Map of Horley Town Council

Annex 2 – Map of Banstead & The Villages Council

Annex 3 – Map of Redhill Town Council

Annex 4 – Map of Reigate Town Council

Annex 5 – Responses to the consultation

Annex 6 – Stakeholder organisations responses to the consultation

Annex 7 – Equality Impact Assessment