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**Our Ref: BCE Review/ARO**

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The Secretary to the Commission  
Boundary Commission for England  
35 Great Smith Street  
London  
SW1P 3BQ

6<sup>th</sup> December 2017

Dear Sir/ Madam

I am writing to you in my capacity as the Acting Returning Officer for the Surrey Heath Parliamentary Constituency, in response to the recently published consultation on revised proposals for new parliamentary constituency boundaries in the South East.

I am aware that Surrey Heath Borough Council will be submitting its own representation in respect of the consultation, however the proposed changes will have a significant impact, not only on the successful administration of future elections but also potentially on the integrity of the vote itself; factors which I believe merit being brought to your attention as a separate matter.

Decisions relating to the proposed parliamentary boundary changes have been decided upon using the boundaries which were in place in May 2015; however, as you will be aware, following the recent Local Boundary Review of Surrey Heath, the Windlesham ward which you are proposing to move to the Windsor constituency will no longer exist as a standalone entity after 2019. The Windlesham ward is instead to be divided and subsumed, along with two other electoral areas, into two new wards. Consequently, it cannot be identified as a ward to be used as a building block for designing a constituency, as per the Commission's Guide, and if the proposal was to go ahead, during any parliamentary election, two separate polls would need to be conducted in each of the two newly created local wards. A situation which runs contrary to the Boundary Commission's stated policy of avoiding the division of wards unless there are compelling reasons to do so.

In addition to the above, I wish to submit the following comments in objection to the proposal to move Windlesham Ward to Windsor Parliamentary Constituency which will add unnecessary complexity and risk to the running of parliamentary polls:

- Under the current parliamentary boundaries, Surrey Heath constituency takes on the wards of Ash South & Tongham, Ash Vale, and Ash Wharf from Guildford



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Borough. Whilst it is not unusual to have cross boundary areas with more than 1 authority, the proposals will result in the need to coordinate cross boundary arrangements both within and outside the county boundaries. Hitherto all cross boundary matters have been with other Surrey authorities and arrangements are well established across this network, including local agreements and protocols for managing deadlines, the supply of any necessary documentation, secure data sharing, and agreed local fees and charges. The respective (Acting) Returning Officers in Berkshire have similar arrangements in place and the Acting Returning Officer for Windsor Constituency will be equally disrupted by this proposal.

- The adoption of the Fixed Term Parliament Act brought in a period of stability for electoral administrators which meant that it was possible to provide the public with a consistent and robust service. However, the events of 2017 have made it very clear to electoral administrators across the Country that this stability was not something that could or should be taken for granted. Furthermore, the seven week window in which electoral administrators were given to organise and execute a parliamentary election this year reinforced a number of concerns around cross-boundary matters, particularly in relation to staffing, reissuing of lost or spoilt postal votes, the receipt and verification of postal votes at combined elections, the sharing of information between authorities and the delivery of ballot papers to count venues.
- It is my contention that these proposals will further exacerbate issues around coterminosity of boundaries, which will in particular impact heavily on the difficulties of running combined elections in the future. Additional cross boundary meetings will need to be arranged at critical times in the elections programme, taking my very limited number of Elections staff away from the business of running and delivering a successful election.
- Another practical concern would be at the time of combined Parliamentary and Local Elections when the ballot box containing the local election ballot papers needs to be delivered to a count venue in Camberley whilst the Parliamentary ballot box from the same polling station needs to be delivered to a count venue in Maidenhead, a round trip of 38 miles and over one hour drive. This will require additional arrangements to be made to ensure that ballot papers are safely and expediently delivered to the correct count venue.
- The counties of Berkshire and Surrey are being treated as a sub-region, however there is only one constituency boundary which crosses the county boundaries, so in practice it is not acting as a sub region. The only purpose of this sub region from what I can see is to facilitate moving Windlesham ward to the Windsor Constituency in order for the numbers balance.

I appreciate that on the face of it these objections do not appear insurmountable. However, having discussed the practicalities and the complications that can occur in the run up to the declaration of results in a high profile, high turnout election with my Elections Team, I am clear that these proposals would, if implemented, place an unacceptable risk upon the administration and integrity of future parliamentary elections in the affected constituencies.

I trust the Commission will look favourably on my submission.

Yours faithfully

Karen Whelan  
Acting Returning Officer, Surrey Heath Parliamentary Constituency

cc; Acting Returning Officer – Windsor Parliamentary Constituency  
Michael Gove MP