REPORT OF ASSISTANT COMMISSIONER
NICHOLAS GRIFFIN QC
ON THE
DISTRICT ELECTORAL AREAS COMMISSIONER’S
PROVISIONAL RECOMMENDATIONS
FOR
NORTH DOWN AND ARDS DISTRICT

September 2013
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1. Introduction

The new Northern Ireland Local Government Districts

1.1 Following a review of local government wards and districts in 2008/9 the Local Government (Boundaries) Order (NI) 2012 was made on 30 November 2012 establishing the boundaries and names of 11 new local government districts for Northern Ireland and their constituent wards. The new districts, as set out in the 2012 Order, are:

- Antrim and Newtownabbey
- Armagh, Banbridge and Craigavon
- Belfast
- Causeway Coast and Glens
- Derry and Strabane
- Fermanagh and Omagh
- Lisburn and Castlereagh
- Mid and East Antrim
- Mid Ulster
- Newry, Mourne and Down
- North Down and Ards

1.2 The Belfast local government district comprises 60 wards; Armagh, Banbridge and Craigavon district and Newry, Mourne and Down district both contain 41 wards; and the remaining 8 districts have 40 wards each.

Review of District Electoral Areas

1.3 The Secretary of State for Northern Ireland, the Rt. Hon. Theresa Villiers MP, appointed Richard Mackenzie, CB, as District Electoral Areas Commissioner for Northern Ireland with effect from 21 January 2013. His task was to make recommendations for the grouping together of the wards in each of the eleven new
local government districts into District Electoral Areas (“DEAs”) for the purpose of local government elections.

Legislation

1.4 The legislative provisions concerning the appointment and function of the Commissioner, the procedures to be followed in reviewing DEAs and the rules in accordance with which recommendations are to be made are contained in the District Electoral Areas Commissioner (Northern Ireland) Order 1984 (“1984 Order”), as amended by the District Electoral Areas Commissioner (Northern Ireland) (Amendment) Orders of 2007 and 2009 and the District Electoral Areas Commissioner (Northern Ireland) Order 2012.

1.5 Schedule 3 to the 1984 Order, as amended, prescribes four rules in accordance with which recommendations of the Commissioner are to be made. These are:-

1. No ward shall be included partly in one electoral area and partly in another.
2. Each electoral area shall consist of not less than five, and not more than seven, wards.
3. Each ward in an electoral area shall have at least one boundary in common with another ward in that area, except where the ward consists of an island.
4. A name shall be given to each electoral area.

Other factors

1.6 In publishing his Provisional Recommendations in May 2013, the Commissioner noted that the 1984 Order does not provide any guidance as to the factors which could or should be taken into account in formulating proposals for DEAs or whether the number of wards to be included in any electoral area should be 5, 6 or 7. In the absence of such guidance, and for the reasons set out at paragraphs 3.2 to 3.8 of the Provisional Recommendations Report, he considered it reasonable
to establish a range of factors which would inform his approach to the grouping of wards as DEAs. The approach which he adopted was, where possible, to have regard to the following:

- the use of physical features such as loughs, estuaries, rivers, hill ranges, and major roads as DEA boundaries;
- the creation of distinct urban and rural DEAs;
- the inclusion of complete settlements within a DEA;
- the creation of geographically compact DEAs;
- the creation of DEAs where the ratio of electorate to each councillor is not more than 10% from the overall ratio for the district as a whole.

1.7 The Commissioner also felt that it would be unreasonable to ignore the existing DEA framework altogether, since it has been in place for many years. However, he recognised that there has been a substantial change in the ward architecture of Northern Ireland as a result of the Local Government (Boundaries) Order (NI) 2012.

**Naming of DEAs**

1.8 The approach adopted by the Commissioner to the naming of his proposed DEAs is set out at paragraph 3.9 of the Provisional Recommendations Report. He has often used existing DEA names with which people are familiar. Where the difference between the old and new DEAs is significant, he has proposed a new name which has a resonance with the locality concerned, by reference to place names or geographical features.
Public consultation

1.9 The procedure to be followed in a review of District Electoral Areas (DEAs) is set out in Schedule 2 to the 1984 Order, as amended, and provides among other things for:

- an eight week public consultation period for the submission of written representations with respect to the Commissioner’s provisional recommendations for electoral areas in a district; and
- the holding of a public inquiry where representations are received objecting to the Commissioner’s provisional recommendations for a district. If a district council or not less than 100 electors make an objection, an inquiry must be held, otherwise inquiries may be held at the Commissioner’s discretion.

Provisional Recommendations

1.10 The Commissioner’s provisional recommendations for the grouping of wards into District Electoral Areas, together with his recommendations for their names, were published on 2 May 2013 for an eight week public consultation period ending on 27 June 2013. A total of 30 representations were received in relation to his proposals. The Commissioner’s provisional recommendations, including maps, and the representations received may be viewed on his website.

Public Inquiries

1.11 On the basis of the representations received, the Commissioner decided that nine public inquiries should be held to consider objections to his proposals. No representations were received in relation to the Causeway Coast and Glens district and the only objections to the proposals for Derry and Strabane district were to the proposed name of the Rosemount DEA. No public inquiries were deemed necessary in those districts. Details of the nine public inquiries were published in advance in a number of daily and provincial newspapers as well as on the Commissioner’s website.
Appointment of Assistant District Electoral Commissioners

1.12 The legislation provides that the Commissioner may ask the Secretary of State to appoint one or more Assistant Commissioners to inquire into, and report on, such matters as the Commissioner thinks fit. Accordingly, the Secretary of State for Northern Ireland, the Rt. Hon. Theresa Villiers MP, appointed me as Assistant Commissioner on 2 July 2013.

1.13 I was directed by the Commissioner to preside over the public inquiry into objections to his provisional recommendations for the DEAs for the North Down and Ards District. The inquiry was held in the Clandeboye Lodge Hotel, Bangor on 2 September 2013. Six people made oral representations, three of whom had already submitted views in writing during the consultation period. All participants were given the opportunity to give their views fully and to comment on the views expressed by others. A list of the written representations received is at Appendix A of this report. Details of those who made oral submissions are at Appendix B. A transcript of the inquiry can be viewed on the Commissioner’s website.

Site visits

1.14 I have been to view those areas of greatest controversy and concern within North Down and Ards, including relevant parts of the proposed Craigantlet, Bangor West, Bangor, Copeland and Ards Peninsula DEAs. I have made visits to both Donaghadee and Millisle.

Content of the report

1.15 This report considers the written and oral representations received in relation to the proposed groupings of wards into DEAs for the North Down and Ards district and on the recommended names for the DEAs. It details support for, objections to and counterproposals made in relation to the Commissioner’s provisional recommendations and presents my conclusions and recommendations.
1.16 I am grateful to the people and organisations making representations, who must have put in a great deal of time and effort in preparing them. I am grateful also to those who appeared at the public hearings for making their representations in a very helpful manner.

1.17 I have considered all of the representations made (both written and oral) in relation to North Down and Ards. I have taken them all into account in arriving at my conclusions and making my recommendations in this report, although I do not make specific reference to all aspects of each and every one of them below. I have taken account of all of the rules set out in Schedule 3 of the 1984 Order and the full range of factors identified by the Commissioner. My recommendations are based on my judgement of the balance of these factors in light of the need to compose DEAs in accordance with the statutory requirements.
2. DEA Ward Groupings

Introduction

2.1 The 40 wards of North Down and Ards Local Government District contain a total electorate of 111,915, making a ward electoral average of 2,798. The Commissioner’s proposal is for seven DEAs in this local government district, broken down into four DEAs with five wards, one DEA with six wards and two DEAs with seven wards.

2.2 The only counterproposals covering the whole North Down and Ards Local Government District are put forward by the Alliance Party and Michael Moriarty. The Alliance Party puts forward alternative counterproposals in its written representation. Model 1 recommends minimal change to the Commissioner’s proposals (the movement of a single ward from one DEA to another) but suggests a number of name changes. Model 2 recommends much greater structural change. Cllr Michael Bower, speaking on behalf of the Alliance Party at the public inquiry, explained that the two models were possibly given equal weighting in the written submission but made it clear that Model 2 is now being advanced as the preferred model.

2.3 The counterproposals contained in the Alliance Party’s Model 2 and Mr Moriarty’s representation are identical where they relate to the grouping of wards into DEAs. Cllr Bower told me that the Alliance Party and Mr Moriarty had arrived at their counterproposals completely independently from one another. These counterproposals are for six DEAs in the District, broken down into one DEA with five wards and five DEAs with seven wards. The Alliance Model 2 / Moriarty counterproposals therefore result in fewer but generally larger DEAs than the Commissioner’s proposal. I was told that there was no significance in the number of seven ward DEAs in the counterproposals, other than as a way of bringing better coherence to the DEAs in North Down and Ards. The DEAs put forward in the counterproposals meet both the statutory criteria set out in the 1984 Order and the additional factor, identified by the Commissioner, that the ratio of electorate to each councillor is not more than 10% from the overall ratio for the district as a whole.
2.4 Peter Gibson of the SDLP spoke in favour of the Alliance Model 2 / Moriarty counterproposals at the public inquiry whereas Cllr Lee Reynolds of the DUP and Cllr Brian Wilson, Independent, spoke in broad support of the Commissioner’s proposals.

2.5 I turn now to consider the counterproposals to the Commissioner’s proposed DEAs, starting with Craigantlet and working clockwise to Lisbane. This part of my report is concerned with the structure of the DEAs. I come on to consider the issue of names in part 3.

CRAIGANTLET

Objections and Counterproposals

2.6 Among the main observations made concerning this DEA are that it includes wards which contain pockets of Bangor within them. This is as a result of “anomalies” created by the siting of ward boundaries. Areas such as Carnalea, Crawfordsburn Road and Lord Wardens, which I was told are identifiably part of Bangor, have nonetheless been included in Helen’s Bay and Clandeboye wards. These wards are located in Craigantlet DEA under the Commissioner’s proposals. Michael Moriarty also pointed to the uneven eastern boundary of the DEA, particularly at the location of Rathmore and Kilcooley wards.

2.7 The Alliance Model 2 / Moriarty counterproposals are to take the Commissioner’s five-ward Craigantlet DEA and to add Rathmore and Kilcooley wards to it from his Bangor West DEA. It is suggested that the main advantages of this are that:

- It builds on the precedent of the inclusion of part of western Bangor in wards located to the west. The Alliance Party written representation puts it this way: “Given that Craigantlet DEA is encroaching into traditional Bangor West already under the Commissioner’s proposals, it may make more sense to in effect increase that DEA’s boundaries as far as Springhill Rd/Circular Rd”.


• It creates a clearer, straighter and more regular eastern boundary to the DEA, the top half of which for the most part follows the Springhill Road and West Circular Road.

• It is part of a rearrangement of wards that creates more compact DEAs in North Down and Ards. For example, the transfer of Rathmore and Kilcooley wards from the Commissioner’s proposed Bangor West DEA to Craigantlet allows the Alliance Party and Michael Moriarty to propose a compact DEA for central Bangor, which I consider below.

Support for the Commissioner’s proposal and objections to the counterproposals

2.8 Cllr Brian Wilson supports the Commissioner’s proposals across North Down and Ards, stating that he thought the Commissioner had done an excellent job given the limitations under which he was working. Cllr Wilson spoke in particular support of the proposed Craigantlet DEA, on the basis it that it takes much of the existing Holywood DEA and adds Clandeboye ward to it in order to reach the minimum requirement of five wards. This results, as he put it, in a very sensible DEA.

2.9 The principal objections to the Alliance Model 2 / Moriarty counterproposals come from Cllrs Wilson and Reynolds. In summary they are that:

• The DEA would include Rathmore and Kilcooley wards, which are long-established communities and part of Bangor with no real relationship with Holywood.

• It would create an uneven DEA with big urban settlements (Holywood and west Bangor) at either end.

• It would result in a loss of identity for Holywood, which is a community that is protective of its identity.
Conclusion

2.10 The counterproposal to move the two wards of Rathmore and Kilcooley into a Craigantlet DEA, when it is agreed that they form part of Bangor, is not in my view a sensible approach. It should be noted that Cllr Bower candidly accepted that these wards identify more with Bangor than with Holywood. I accept that anomalies in the ward architecture mean that pockets of Bangor are already included in wards within the Commissioner’s proposed Craigantlet. That does not make it sensible to transfer over greater parts of Bangor and to increase the anomaly, even if it would result in a more regular eastern boundary to the DEA. I have concluded that in all of the circumstances the Commissioner’s proposal for Craigantlet provides the best reflection of the relevant factors.

Recommendation

2.11 My recommendation is for no change to the Commissioner’s proposed Craigantlet DEA.

BANGOR WEST

Objections and Counterproposals

2.12 The Alliance Model 2 / Moriarty counterproposals reduce the number of DEAs within North Down and Ards from seven under the Commissioner’s proposals to six. The Commissioner’s proposed Bangor West effectively ceases to exist under these counterproposals, with two of its wards (Rathmore and Kilcooley) being transferred to Craigantlet DEA and the remaining three being transferred to a central Bangor DEA.

Conclusion

2.13 I have considered the representations as they relate to Craigantlet above and will consider those in relation to the central Bangor DEA below. For reasons given there, I have concluded that counterproposals resulting in the division of Bangor
West in this way do not form the best approach. In my view, the DEA proposed by the Commissioner is to be preferred. It represents a practical and compact urban DEA.

**Recommendation**

2.14 My recommendation is for no change to the Commissioner's proposed Bangor West DEA.

**BANGOR**

**Objections and Counterproposals**

2.15 Cllr Bower was particularly critical of the eastern boundary of the proposed DEA where it runs through Silverbirch, Ballycrochan and Ballymagee wards. He described it as arbitrary, going through a densely populated area with no clear landmark by which to identify it, and confusing from a resident’s perspective.

2.16 Alderman Chambers told me that Silverbirch ward would strongly identify itself as part of Bangor East and as part of the same community as Ballycrochan and Ballymagee wards (which the Commissioner places in the separate Copeland DEA). Alderman Chambers suggested that the Commissioner’s proposals cast Silverbirch adrift from the Bangor East identity.

2.17 The Alliance Model 2 / Moriarty counterproposals are for a new central Bangor DEA, which would include Silverstream, Rathgael and Bryansburn wards from the Commissioner’s Bangor West DEA and Harbour, Ballyholme, Broadway and Castle wards from his Bangor DEA. The main advantages of the counterproposals are said to be that:

- It creates a coherent and compact DEA of the central wards of Bangor, bringing together what could be considered “old Bangor” within one DEA, with newer parts of the town situated outside.
• It uses the Bangor Circular Road as a significant and easily identifiable and understandable DEA boundary.

2.18 Cllr Bower put it in this way at the public inquiry: “The advantage of this, particularly from a resident’s perspective, is you’re much clearer as to who your representatives are, what DEA you’re in simply by seeing what side of the ring road you are on…”.

Support for the Commissioner’s proposal and objections to the counterproposals

2.19 Cllr Reynolds spoke in favour of the Commissioner’s proposals generally, on the basis that they have used as their building blocks the existing DEAs in most cases and that where possible they build around the major urban conurbations. He suggested that the Alliance Model 2 / Moriarty counterproposals create entirely new structures which would be difficult to communicate to people.

2.20 With regard to central Bangor specifically, Cllr Reynolds submitted that the Circular Road does not constitute the strong boundary suggested. This is because it is broken at Rathgael ward and does not go around the entirety of the DEA.

Conclusion

2.21 The Alliance Party Model 2 / Moriarty counterproposals would result in an attractively compact DEA with an easily identifiable boundary of the Circular Road and, where that ends, the Springhill Road. In my view, the breach at Rathgael ward is not significant for these purposes. Unfortunately, these counterproposals come at what I consider to be an unacceptable cost. In order to achieve this central Bangor DEA, the Alliance Party and Mr Moriarty have found it is necessary to transfer Rathmore and Kilcooley wards to the neighbouring DEA to the west (as we have seen) and to divide the town of Donaghadee between different DEAs to the east (a matter I consider below).

2.22 However, I see the force in the criticism raised about the separation of Silverbirch from Ballycrochan and Ballymagee wards. I have concluded that it is
appropriate to transfer Silverbirch ward from Bangor to join these wards in Copeland DEA. This has the additional beneficial effect of improving the heavily criticised boundary between the two DEAs.

**Recommendation**

2.23 My recommendation is therefore for change to the Commissioner’s proposed Bangor DEA, namely the transfer from it of the single Silverbirch ward to Copeland DEA.

**COPELAND**

**Objections and Counterproposals**

2.24 The principal objections raised against the Commissioner’s proposed Copeland DEA are that:

- It has no natural centre, coherence or identity. It was described variously as a “badly arranged marriage” (by Alderman Chambers, who supported the Alliance Model 2 / Moriarty counterproposals) and “a mirage of different ideas which to the layman would look like it was just cobbled together …” (Cllr Bower).

- It includes a section of Newtownards that has no connection to the North Down wards within the proposed DEA.

- The southern boundary of the proposed DEA runs through the centre of, and splits, the village of Millisle.

2.25 As to the last bullet point, Louis Scott on behalf of the Millisle & District Community Association strongly contends that Millisle should be kept as a single unit within a single DEA. This representation is supported by 111 written petitions that place on record the signatories’ “total objection” to the split. I was also told that the split would “have quite a devastating effect on community spirit” on a small and
cohesive settlement such as Millisle (Alderman Chambers) and would add to “confusion and loss of identity” (UUP written representation, reporting the concern of the members of the Strangford and North Down Ulster Unionist Associations).

2.26 Mr Scott brought my attention to paragraphs 3.6 and 3.7 of the Provisional Recommendations Report, and particularly to one factor identified by the Commissioner, namely the inclusion of complete settlements within a DEA. In his written representation Mr Scott had suggested that this should be Copeland. In fact, it would not be possible to transfer Carrowdore ward, which contains the southern part of Millisle, into Copeland DEA as this would leave Ards Peninsula with only four wards. At the public inquiry Mr Scott told me that the organisation had reconsidered matters and that their preference was to be part of Ards Peninsula DEA.

**Alliance Model 2 / Moriarty counterproposals**

2.27 The counterproposals advocate the creation of a DEA made up of four wards from the Commissioner’s proposed Copeland DEA (Groomsport, Warren, Ballycrochan and Ballymagee) and three wards from the Commissioner’s proposed Bangor DEA (Ballygrainey, Bloomfield and Silverbirch).

2.28 A significant feature of the counterproposals is the transfer of the Loughries ward from the Commissioner’s proposed Copeland DEA to Ards Peninsula DEA. This has the effect of reuniting Millisle within Ards Peninsula DEA. It also means that the section of Newtownards that Loughries ward contains is separated from the North Down/Bangor wards. Peter Gibson has a long family association with Lower Ards. He told me that the “historic connection logic” is indeed for Loughries to be part of Ards Peninsula.

2.29 However, the counterproposal results in the splitting of Donaghadee between different DEAs. Cllr Bower explained that Donaghadee is larger than Millisle, and therefore better placed to withstand a split. He suggested that the north of Donaghadee has its own distinct identity, which could fit quite neatly into a North Down leading DEA (Copeland), with the south and more densely populated part of the town going into Ards Peninsula DEA.
Alliance Party Model 1 counterproposal

2.30 It should be noted here that the only structural change suggested under the Alliance Party’s Model 1 is the transfer of Loughries ward from Copeland to Ards Peninsula. The result of this simple change is that neither Donaghadee nor Millisle are split.

Support for the Commissioner’s proposal and objections to the counterproposals

2.31 The main criticism of the Alliance Model 2 / Moriarty counterproposals is that they result in the split of Donaghadee in place of Millisle.

2.32 I therefore heard (hotly contested) evidence about the relative problems caused by the splitting of Millisle or Donaghadee. Cllr Reynolds said that dividing Donaghadee makes no sense. Cllr Wilson spoke of Donaghadee as a unit with its own identity. He thought it would be better to split Millisle, as the split of the larger Donaghadee would affect more people. Mr Scott and Alderman Chambers suggested that, on the contrary, the effect of a split would be more keenly felt within the smaller Millisle.

2.33 Cllr Bower accepted it would be better not to split Donaghadee. For their part, those supporting the Commissioner’s proposal for Copeland also accepted it would be better not to split Millisle. However, I was told by both sides in this argument that a split, whether it be at Millisle or Donaghadee, was unfortunately unavoidable in order to achieve the best DEAs over North Down and Ards as a whole, given the statutory limitations under which one must work.

2.34 Cllr Reynolds opposed the transfer of Loughries from Copeland to Ards Peninsula on the basis that it would put part of Newtownards into a predominantly rural DEA. He said it would be better placed in Copeland, which is mixed urban and rural. However, this would place part of Newtownards into the same DEA as part of Bangor, which itself may cause difficulties. I heard from Cllr McDowell of Ards Borough Council that there is an historic rivalry between Newtownards and Bangor. Although in favour of the Alliance Model 2 / Moriarty counterproposals, Peter Gibson commented that the moving of Loughries creates yet another issue and that is the
breaking of the link between Donaghadee and Millisle, which for a number of years have been treated together as one unit.

**Conclusion**

2.35 I accept some of the criticisms levelled against the proposed Copeland DEA but do not accept that the appropriate way of dealing with them is a rearrangement which requires that Donaghadee rather than Millisle should be split. I do not accept the argument that it is inevitable that one or other must be split in order to arrive at the best outcome for the local government district as a whole. It is significant in this regard that the Alliance Model 1 counterproposal, initially put forward by the Alliance Party with equal force to its second model, provides an alternative approach which divides neither Donaghadee nor Millisle.

2.36 In my view, the combined effect of this Model 1 counterproposal, involving the simple transfer of Loughries from Copeland to Ards Peninsula, with the transfer of Silverbirch ward from Bangor to Copeland (as recommended above) results in a stronger, more compact and coherent DEA than that which has been proposed by either the Commissioner or in the Alliance Model 2 / Moriarty counterproposals. I therefore do not have to resolve whether it would be better to split Millisle or the larger Donaghadee as I have concluded that neither need nor should be divided between different DEAs.

2.37 This rearrangement of wards within Copeland DEA means that the relatively small part of Newtownards contained within Loughries ward would become part of Ards Peninsula DEA. In my view this is the preferable approach in all of the circumstances. My conclusions also result in Donaghadee and Millisle being located in separate DEAs. This is certainly preferable to any solution in which one or other is divided between different DEAs.

**Recommendation**

2.38 My recommendation is therefore for change to the Commissioner’s proposed Copeland DEA, namely the transfer to it of Silverbirch ward from Bangor DEA (see above) and the transfer from it of Loughries ward to Ards Peninsula DEA.
ARDPS PENINSULA

Objections and Counterproposals

2.39 The options for this DEA are strictly limited precisely because it is a peninsula and because of the statutory requirements governing the number of permissible wards per DEA.

2.40 The central criticism of the Commissioner’s proposed DEA is that it splits Millisle. All of the Alliance Party and Michael Moriarty counterproposals advocate the transfer of Loughries ward to Ards Peninsula to address the problem. This and other relevant matters are considered above.

Conclusion

2.41 For reasons given above, I have concluded that it is appropriate to transfer Loughries ward from Copeland to Ards Peninsula.

Recommendation

2.42 My recommendation is for a single change, namely the transfer of Loughries ward from Copeland to Ards Peninsula DEA.

LISBANE

Objections and Counterproposals

2.43 I received no objections or counterproposals in relation to the Commissioner’s proposed Lisbane DEA.

Conclusion and Recommendation

2.44 I have concluded that it requires no change and make my recommendation accordingly.
NEWTOWNARDS

Objections and Counterproposals

2.45 I received no objections or counterproposals in relation to the Commissioner’s proposed Newtownards DEA.

Conclusion and Recommendation

2.46 I have concluded that it requires no change and make my recommendation accordingly.
3. DEA Names

3.1 The Alliance Party, DUP and Ards Borough Council suggest name changes to certain of the Commissioner’s proposed DEAs. In two cases, the Alliance Party and DUP recommend identical name changes. I was told at the public inquiry that this follows discussions between the two parties on this topic.

CRAIGANTLET

3.2 The DUP and Alliance Party Model 1 counterproposals put forward the same name: Holywood and Clandeboye. In summary, this is on the basis that:

- Craigantlet constitutes only a small aspect of the DEA.

- The lengthy and diverse nature of the DEA makes identification of a single name difficult and imperfect.

- Holywood is the biggest town and should be reflected in its name as should Clandeboye, which represents an important further element to the DEA.

3.3 The Alliance Party suggests an alternative name under its Model 2 of Holywood and Bangor West. This must be on the basis of the inclusion of the two west Bangor wards of Rathmore and Kilcooley in the DEA, a counterproposal which I have rejected above.

Conclusion

3.4 I accept the reasoning set out above in relation to the DUP / Alliance Model 1 counterproposals.

Recommendation

3.5 My recommendation is therefore that the name of Craigantlet DEA be changed to Holywood and Clandeboye.
BANGOR WEST

3.6 I have received no counterproposals concerning the name of this DEA.

Conclusion

3.7 In my view it suitably captures the nature of the DEA proposed by the Commissioner. It is also the name of the existing DEA and will therefore be familiar to people.

Recommendation

3.8 Accordingly, my recommendation is for no change to the proposed name of Bangor West.

BANGOR

3.9 The Alliance Party suggests a name change to Bangor Central under both of the models it puts forward. Cllr Bower explains that there is more to the town of Bangor than the wards the DEA contains and that the DEA’s name requires some addition to reflect this.

3.10 Bangor Central would certainly be appropriate for the central DEA put forward as part of the Alliance Model 2 / Moriarty counterproposals, which I have rejected.

Conclusion

3.11 I have come to the conclusion that it is appropriate to provide a more descriptive name than Bangor for the Commissioner’s proposed DEA (including as amended in accordance with my recommendation above). This is mainly for the obvious reason that it includes the central part of the town and is located between DEAs which also contain parts of Bangor.
**Recommendation**

3.12 My recommendation is therefore that the name of Bangor DEA be changed to Bangor Central.

**COPELAND**

3.13 The DUP and Alliance Party Model 1 counterproposals put forward the same name: Bangor East and Donaghadee. The name put forward by the Alliance Party under its Model 2 counterproposal, which I have rejected, is East Bangor and Groomsport.

3.14 In summary, the Bangor East and Donaghadee name is recommended on the basis that:

- Copeland, a group of three islands to the north of Donaghadee, is too small a geographical feature to justify it becoming the name of the entire DEA.

- People living in the areas of Bangor within the DEA would feel a sense of loss of identity if it were to be called Copeland.

- Bangor East and Donaghadee is a more accurate and identifiable name, which would have greater resonance with the locality concerned.

**Conclusion**

3.15 I agree that the name of the DEA proposed by the Commissioner should reflect the fact that it includes part of Bangor. I accept that the name should also recognise that the DEA encompasses an important area outside Bangor and that the appropriate candidate for inclusion is Donaghadee. In my view, the Bangor East and Donaghadee name is also appropriate for the more compact DEA I have recommended.
Recommendation

3.16 My recommendation is therefore that the name of Copeland DEA be changed to Bangor East and Donaghadee.

ARDS PENINSULA

3.17 The Alliance Party counterproposal is for a name change to Peninsula DEA. This is put forward under Model 2 and possibly also under Model 1 (no specific representation is made as to the name under Model 1 but the text describing the proposed structural change does refer to “Peninsula DEA”). No positive reason for the change has been given to me, either in the written representation or at the public inquiry. No other individual or organisation has spoken in support of the change.

Conclusion

3.18 I do not accept that any name change is necessary. Furthermore, the existing DEA covers much of the same area and is called Ards Peninsula, a name that will accordingly be familiar to those concerned.

Recommendation

3.19 My recommendation is therefore for no change to the proposed name of Ards Peninsula.

LISBANE

3.20 Members of Ards Borough Council submit that the DEA should be re-named Comber. This is to reflect the fact that Comber is the largest settlement in the DEA and that three of its five wards contain Comber in their name. The suggestion is that Lisbane, on the other hand, is a small hamlet and therefore not reflective of the wider identity of the DEA.
The DUP agrees that Lisbane is not the appropriate name for the DEA. Cllr Reynolds also agrees that the DEA is predominated by Comber. However, the DUP does not accept that Comber is an appropriate name for the DEA either. This is because the DEA contains two other towns (Ballygowan and Killinchy) and it is not right to choose one over the others. The name of Nendrum is put forward instead as having greater local resonance and reflecting the deep Christian heritage of County Down.

**Conclusion**

I agree that Lisbane is not a name that will have sufficient resonance with the entirety of the locality concerned. I acknowledge that the DEA contains three towns, but have concluded that it is nonetheless appropriate to name the DEA after Comber alone, for the reasons put forward by Ards Borough Council.

**Recommendation**

My recommendation is that the name of Lisbane DEA be changed to Comber.

**NEWTOWNARDS**

I have received no counterproposals advocating the change of this DEA’s name.

**Conclusion**

The existing DEA is called Newtownards and the name is clearly appropriate for the Commissioner’s proposed DEA, which remains centred on the town.

**Recommendation**

My recommendation is therefore for no change to the proposed name of Newtownards.
4. **Summary of Recommendations**

4.1 I have concluded that the DEAs proposed by the Commissioner require structural change in two respects: the transfer of Silverbirch ward from the proposed Bangor DEA to Copeland and the transfer of Loughries ward from the proposed Copeland DEA to Ards Peninsula. The result is a District containing seven DEAs, broken down into three DEAs with five wards, three DEAs with six wards and one DEA with seven wards. These changes result in DEAs that meet the statutory criteria set out in the 1984 Order and in which the ratio of electorate to each councillor is not more than 10% from the overall ratio for the district as a whole.

4.2 I have also recommended four changes to the names proposed by the Commissioner: Holywood and Clandeboye (in place of Craigantlet), Bangor Central (in place of Bangor), Bangor East and Donaghadee (in place of Copeland) and Comber (in place of Lisbane).
5. **General Issues**

5.1 Certain of the representations I received concerned issues outside the scope of this review. The boundaries and names of wards have already been settled under the terms of the Local Government (Boundaries) Order (NI) 2012 and it is not open to me to review them. I have therefore not taken into account representations advocating a change to the location of particular ward boundaries (in the Millisle and Carnalea areas for example) but have worked with the wards as settled under the 2012 Order as my building blocks.
6. Conclusion

6.1 I should once again like to take this opportunity to express my sincere thanks to all those who submitted written representations and attended the public hearing for the effort which they put into preparing their evidence and for their willingness to engage in the proceedings.

6.2 My thanks go also to each of the members of the DEAC secretariat who supported me in conducting the public hearing and in preparing this report.

Nicholas Griffin QC

Assistant District Electoral Areas Commissioner

25 September 2013
LIST OF WRITTEN SUBMISSIONS

Alliance Party of Northern Ireland

Ards Borough Council

Democratic Unionist Party

Donaghadee Commerce and Development Group

Millisle and District Community Association

Michael Moriarty

Ulster Unionist Party
LIST OF ORAL REPRESENTATIONS

Councillor Michael Bower (Alliance)
Alderman Alan Chambers (Independent)
Mr Peter Gibson (Member of North Down SDLP)
Councillor Alan McDowell (Alliance Party)
Councillor Lee Reynolds (DUP)
Mr Louis Scott (Millisle and District Community Association)
Councillor Brian Wilson (Independent)