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Dear Alex

R&BBC Community Governance Review

Salfords & Sidlow Parish Council ("the Parish Council") submits the following response to the current phase of the Reigate & Banstead Community Governance Review.

The Parish Council **objects** to the proposed expansion of the parish boundary to include South Earlswood and Whitebushes. To be clear, the Parish Council represents over 2,700 residents and has considered this matter on their behalf. We are aware that R&BBC is undertaking a consultation and would highlight that many of our residents have not received any postal communication from the Council in relation to the various proposals which directly affect them. We urge the council to review this urgently to ensure that affected residents are treated equally. We detail below the matters we have discussed which we have tried to bring to the attention of R&BBC where we identify risks for our residents. We have not been able to obtain any satisfactory information on ways in which these risks will be mitigated.

1. Initial Submission Not Reflected in Current Proposals

In response to the first consultation, the Parish Council stated clearly that it had reviewed wards to the north (EWB4, EWB5, SPW5 and part of SPW1) and would welcome further discussion with residents in those areas and with Reigate & Banstead Borough Council (R&BBC). This dialogue was needed to properly understand the possible benefits, risks and practical implications of any potential expansion.

The Parish Council made explicit that before it could consider or support any amendment to the existing parish boundary, it would need to:

- understand the views of current parish residents,
- understand the views of residents in any proposed expansion area,
- assess financial risks and possible asset transfers, and
- receive support from R&BBC to calculate staffing and resourcing needs should the number of electors increase significantly.

None of these conditions were met. The recommendations now being consulted upon do not reflect the Council's stated position or the concerns raised in its initial submission. Our concerns over future viability of an expanded Parish Council have been heightened by the lack of information or assurances provided by R&BBC to date.

2. Concerns about experience and recruitment of councillors

Our concerns are even more heightened by the proposal that the current number of Councillors are reduced to a minority in the expanded Parish Council, with a majority of novice Councillors now proposed who would not have sufficient knowledge of the services we provide nor the services new residents would need: the financial risks and service risks have been significantly increased. The existing parish has always been able to attract people willing to be members of the parish council. We are concerned that the lack of experience in the South Earlswood and Whitebushes areas and the far greater workload imposed on the reduced number of councillors would make it difficult to attract enough candidates.

3. Concerns About the Current Proposal and the Consultation Process

The Parish Council is frustrated that our first-phase submission had not been considered. Instead, R&BBC appears to have imposed a pre-determined option, without providing the evidence or engagement necessary for responsible decision-making.

Specific concerns include:

- The exclusion of the Woodhatch area, resulting in Sidlow becoming an even more isolated and disproportionately rural ward within the proposed parish configuration.
- The proposal to reduce Salfords ward representation from six councillors to four, despite the proposed expansion of the parish. This contradicts the Phase 1 indication, based on NALC guidance, that the existing parish should have **11 councillors**, not fewer.
- The process does not reflect the Council's openness to discussing boundary change, contingent on understanding impacts and ensuring risks were properly evaluated.
- An apparent failure to consider the residents of the existing Parish equally with those currently unparished. 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.

The timing is not driven by residents wishes, rather an apparent wish from the Borough that all areas have Parish representation, no matter how appropriate to the residents the areas become, within a time period under Borough control. Should South Earlswood and Whitebushes decide they want Parish representation, Salfords & Sidlow Parish Council would happily support them in the creation of a new separate Parish Council which could meet R&BBC timelines. We would have plenty of time in the future to consider the benefits of merging the Parishes and the cost-benefits of doing so.

4. Unjustified Change and Lack of Evidential Basis

The broader governance recommendations—creation of a new “Banstead and The Villages Council,” options for one or two new town councils for Redhill and Reigate, and minor amendments to Horley Town Council—are distinct in purpose and justification.

In contrast, the proposed expansion of Salfords & Sidlow Parish Council:

- lacks a clear governance rationale,
- lacks evidence of community demand,
- lacks analysis of financial and administrative impact, and
- lacks assessment of representation consequences.

We are aware of many discussions in the North of the Borough which support community demand in that area: there are no such discussions South of the Borough.

Not enough effort has been put into investigating the financial and administrative impact, and as a consequence the estimate of precept costs given by R&BBC may be significantly underestimated and even more so once local government reorganisation is complete. Current councillors spend a lot of time working on behalf of residents. An almost doubling of resident numbers per councillor could have consequences which have not been assessed but it seems inevitable that this new more important level of local representation will suffer.

5. Outstanding concerns

For the Council and residents to contribute meaningfully to any boundary-related discussion, we need clarity on many matters – some which have been raised, and responded to by R&BBC: -

1. Evidence of number of significant responses from residents in South Earlswood and Whitebushes
There is no indication of sufficient local support for joining the parish. Without adequate interest, the expanded parish risks insufficient candidates at election, threatening its ability to retain the General Power of Competence.
2. Transparency regarding household costs
The consultation notice references an additional charge for households in the affected areas, but this information is not clearly presented. The Parish Council requests explicit, accessible financial information. From a brief consultation with some residents of South Earlswood and Whitebushes, even the current parish council precept would be more than some residents can afford.
3. Rationale for reducing Salfords ward representation
The basis that the number of councillors being reduced from six to four, given that earlier consultation documentation referenced NALC guidance recommending 11 councillors for the current parish, and given the additional workload associated with onboarding new residents and councillors.
4. Risk of rural marginalisation
How has R&BBC assessed the risk that Sidlow, already rural, may become further marginalised? What safeguards were considered to protect rural interests?
5. Clarity on other risks considered by the Working Group and the Council
What risks to existing residents were identified during the decision-making process? These have not been communicated, and transparent disclosure is essential.

All of these matters could have negative impacts on Parish Council performance with potential costs to existing residents as well as new residents. A responsible council would secure adequate ways of mitigating these risks, before any expansion takes place to protect the interests of current and proposed residents.

6. Risks to Effective Governance and Community Identity

The existing parish boundary reflects a long-standing and coherent community identity. Introducing areas with distinct characteristics risks:

- weakening community cohesion,
- diverting resources away from existing parish needs,
- reducing effective representation, and
- creating governance imbalance—particularly with fewer councillors proposed for Salfords.

The Parish Council repeats that its willingness to consider expansion was always conditional on proper analysis, risk assessment, and genuine consultation with affected communities. None of these conditions have been met.

7. Conclusion

In light of:

- the failure to engage with the Parish Council's initial submission,
- the lack of consultation with current or proposed-new residents,
- the absence of transparent financial, governance and representation analysis,
- the proposed reduction in councillor numbers contrary to NALC guidance,
- the heightened risk of rural marginalisation, and
- the many unanswered questions around impacts and risks,

Salfords & Sidlow Parish Council **objects** to the proposed expansion and urges R&BBC to retain the existing parish boundary.

The Council supports for South Earlswood and Whitebushes to be parished either by joining with Redhill town council (if that option is chosen) or the formation of a separate Parish Council for South Earlswood and Whitebushes. Councillors would be happy to support their communities to evaluate their vision and purpose for such a body as well as during any set-up.

The Council remains open to future discussions after transition has occurred in 2027, provided they are evidence-led, transparent, collaborative and properly informed by the views of all affected communities.

Yours sincerely



Claire Baller
Clerk to Salfords and Sidlow Parish Council