

Democratic Unionist Party  
Second Written Submission to the  
Local Government Boundary Review 2008-09

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## **Introductory and General Remarks**

The Democratic Unionist Party welcomes these new proposals from the Local Government Boundary Commissioner. It wishes to record its thanks to the Commissioner, the Assistant Commissioners and the LGB staff team for progressing the revised proposals in what is a pressing timeframe.

The DUP wishes to re-iterate how much importance it attaches to each and every stage of this review process:

*“The DUP fully recognises the importance of the Local Government Boundary Review. This level of re-organisation has only taken place three times in the last century. These changes will almost certainly shape local government for decades to come. Therefore, we would urge the full utilisation of the provisional, revised and final stages in the consultation. The DUP believes this will be the means of achieving the best possible outcome.”*

The DUP would raise again the issue of borough status and that this option is open to the new councils.

## **Belfast City Council**

The DUP remains unconvinced that the present 60 seat proposals are the best definition of Belfast City Council within readily identifiable boundaries. It remains committed to the expansion northward and retraction in the west and the establishment of a 61 seat council.

## **Public Hearings**

The DUP wishes to note its deep concern of a claim by a Sinn Fein representative on the motivations of the Commission proposals at the public hearing:

*“We feel that the Commission has sought hard to strike a balance, a political balance, within the council area that will be Belfast and we would be concerned that if the five wards which are being proposed to be included, were to be included, it could potentially upset that balance”*<sup>1</sup>

The DUP is perplexed that the notion of the Commission’s work being influenced by considerations of ‘political balance’ was not immediately and publicly rejected by the Assistant Commissioner.

## **The Assistant Commissioner’s Recommendations**

The DUP detects some reluctance on the Assistant Commissioner’s part around the definition of ‘major part’ to be a spatial term rather than population:

*“I believe that this may be an issue that remains open to interpretation as the statute is silent on the definition of “major part”.”*<sup>2</sup>

The party would be concerned that this has caused her to be unduly cautious in her approach to changes to the external boundary.

## **Dunmurry**

The DUP believes that her final recommendations for Dunmurry village are an example of her undue caution. It notes with interest the acceptance of the strength of the alternative line:

*“...it is true to say that both the boundaries I have considered are equally readily identifiable based on the features on the ground such as the river and the main roads in the area. I also noted on a site visit to the area that there is a brief sense of transition when travelling into Dunmurry both from Finaghy and coming in from the Collin Glen and Twinbrook areas.”*<sup>3</sup>

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<sup>1</sup> Transcript of Belfast Public Hearing 20/11/08, Page 14

<sup>2</sup> Report of Belfast Assistant Commissioner, Paragraph 22, Page 9,

<sup>3</sup>Ibid Paragraph 5, Page 6

However, it takes issue with what could be described as her bird's eye view argument in defence of the Commission's proposals:

*"The alternative boundary that would position Dunmurry outside Belfast looks more peculiar in shape, looping upwards to take in an urban area which on the map and on the ground appears to be a connected part of the overall residential development of the area of West Belfast."*<sup>4</sup>

This is not about superficial neatness or symmetry. It is the strength of the alternative boundary itself and relevance to the communities these decisions impact upon, not how it looks on a larger scale map that should be the overriding considerations.

It strongly disagrees with the interpretation that the Belfast Assistant Commissioner reached about local opinion on the change:

*"I must conclude that the local opinion of the residents cannot be determined with any degree of certainty, based on the evidence put before me. I cannot be certain of the true majority opinion as I have only received anecdotal and fragmented evidence that would not stand up to real scrutiny."*<sup>5</sup>

There is a degree of certainty based on the names and addresses provided by those who made written representations to the LGBC. Those who claimed support for Dunmurry's inclusion in Belfast did not provide any substantive supporting evidence only anecdotal evidence. The overwhelming evidence presented to the consultation process is one of local opposition, with 830 letters of objection supplemented by 114 more in a petition, in total a significant proportion of the local population.

The DUP notes the Assistant Commissioner highlighted the inability of the UUP to provide evidence of local support for the transfer of Dundonald to Belfast:

*"I have not received any such evidence regarding public opinion and so I must recommend that in this case the Commissioner cannot attach any weight to the statements made by the UUP about the opinions of the residents, as there is insufficient evidence available upon which he could rely."*

However, comparable standards are not applied to the anecdotal claims by Sinn Fein representatives of local support in Dunmurry for inclusion in Belfast. The DUP would also highlight the SDLP's support for Dunmurry to remain within Lisburn, a submission the Assistant Commissioner seems not to have taken full cognizance of:

*"I have received a number of enquires from constituents concerning the Dunmurry locality becoming part of Belfast. The Dunmurry population arguably, through its history, background, and longer identity with Lisburn town and would prefer to stay in Lisburn City Council and therefore in the new Lisburn Castlereagh Council."*

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<sup>4</sup> Report of Belfast Assistant Commissioner, Paragraph 17, Page 8.

<sup>5</sup> Ibid, Paragraph 8, Page 7

This casts further doubt upon the claims by Sinn Fein representatives. Therefore the two arguments presented to the LGBC but the AC were flawed. Therefore the LGBC should reconsider the recommendation to put Dunmurry into Belfast.

## **Expansion to the North**

The DUP reiterates that to use what is effectively the 1895 boundary to define the 21<sup>st</sup> century Belfast is a fundamentally flawed proposal. Other proposals put forward by the Commission contradict the presentation of the motorway as some inviolate boundary – at the top of Cavehill the proposals for Hightown ward happily cross the motorway. It is further contradicted that the LGBC proposals expand the city council area in every other direction but north. The alternative line proposed is a textbook example of the various elements that the LGBC identified as a readily identifiable boundary.

The LGBC is not alone in providing contradictory arguments to defend this outdated boundary. At the public hearing the Alliance representative claimed that the alternative line would create division:

*“If one were to accept the DUP proposal, which is, I say, superficially attractive, you then draw a new dividing line between Rathcoole and estates like Rathfern, Fernagh, Kings, and Princes which are socially very much part of Rathcoole’s orbit. For example, in terms of voluntary services many vulnerable people in those areas particularly depend on voluntary services delivered from their very strong community base in Rathcoole.”<sup>6</sup>*

This is a somewhat specious argument, as all lines no matter were drawn create an administrative division. It ignores the policy synergy and extra resources that would become available to the voluntary services in the Rathcoole area by being included in Belfast City Council area to the benefit of all its users. It would also be inaccurate to create the impression that Rathcoole voluntary service providers would enforce postcode exclusion/council boundary line exclusion upon its users.

However, in other public evidence the impact of a council boundary upon life is minimized. The Alliance representative argued how the people of Greencastle had been able to adapt to living astride the present and proposed line with its impact upon service delivery. Crucially in the context of Forestside working across boundary lines was presented as simple and straightforward:

*“It is not unprecedented, especially after a time of changed boundaries for Councils, to have offices outside the area in which they serve. It was quite common in England after local government reorganisation in 1973 for Councils to have some offices inside the territory of other Councils for some years, until it became reasonable and prudent and financially sensible to transfer functions back to their own territory. If it happened that a new Lisburn & Castlereagh Council happened to be delivering services from the City of Belfast, I am sure that those of us resident in the City of Belfast would be happy to welcome them to do so until such time as it became sensible and prudent for them to relocate services. I also point out that, for example, the current City of Belfast playing fields are a large part in the Borough of Newtownabbey, and the City of Belfast Cemetery has been kindly*

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<sup>6</sup> Transcript of Belfast Public hearing 20/11/08, Page 42

*hosted by the Borough of Castlereagh since its creation without any difficulty to anyone concerned.”<sup>7</sup>*

Therefore the DUP strongly urges the LGBC to reconsider the northern boundary with a view to creating a further two Belfast wards and the re-organization of Antrim and Newtownabbey in line with the proposals we provided in Appendix 2 of our previous written submission.

### **Gilnahirk Boundary**

The DUP welcomes the amendment to the boundary of the Gilnahirk ward to take account of the development of the business park and that the line has been drawn to ensure the buildings it identified as servicing the Tullycarnet area of Gilnahirk ward. However, our interpretation of the new line is that it will still partially divide this development. There is a new road that stretches along the rear of the buildings previously identified as needed to remain in Gilnahirk ward and the new site that may be a more appropriate line. It would encourage the LGBC to visit the area to assess for himself the impact of his proposed line and alternatives that could keep the site within a single ward and maintain the relevant buildings in Gilnahirk.

### **Forestside and Council Offices**

The DUP remains committed to the transfer of Forestside and the Council offices to Lisburn and Castlereagh. The Saintfield Road is a readily identifiable boundary (almost as wide as the Outer Ring). The Forestside shopping areas and Council offices are significant landmarks the boundaries of which are readily identifiable. Therefore it requests the Boundary Commissioner reconsider his present proposals and make the following minor amendment.

### **Internal Boundaries**

#### **Peace-lines**

The DUP welcomes the Assistant Commissioner’s recommendation:

*“In principle I would accept these arguments, provided they can be accommodated within the rules, and I recommend that the Commissioner looks again at these ward boundaries to try and reflect the peace lines within the new ward boundaries. The peace lines in the city can be said to be readily identifiable features on the ground, albeit that they are not apparent on the map.”<sup>8</sup>*

The DUP believes it has been able to develop proposals that will enable this.

### **Woodvale and Clonard - Mayo Park**

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<sup>7</sup> Transcript of Belfast Public hearing 20/11/08, Page 42

<sup>8</sup> Report of Belfast Assistant Commissioner, Paragraph 5, Page 19

A passing reference to issues concerning a small number of homes at the western end of Mayo Park was made in our previous submission. It had been thought possible that a misprint had been the source of the issue. However, the fact that the issue has arisen again the DUP wishes to draw clear attention to the issue. Almost all of Mayo Park is contained within the proposed Woodvale ward except for 3-4 houses at the western end. There is certainly no identifiable boundary between these houses and the rest of the street. The DUP seeks that the proposed line be moved back (a matter of a dozen or so meters) to the peace-line in keeping with the rest of the ward boundary on that side.

This is comparable with the small adjustment that has been recommended between the Shankill and Clonard wards were the previous proposals made a small breach in the peace-line and impacted on a small number of homes but has now been rectified.

### **Lower Oldpark – Waterworks, Shankill and Woodvale**

Some confusion seems to have developed as to which ward the DUP sought the Lower Oldpark area to be transferred. If the DUP was the source of this the party apologises. The Party seeks the Lower Oldpark area transfer into the proposed Shankill ward.

The Shankill ward boundary should extend from Tennent Street along Hillview Road until it meets the Oldpark Road. It should then follow then peace-line between the Lower Oldpark and Ardoyne area until it meets Cliftonpark Avenue. The ward boundary should be the bounds of the Girdwood site until it meets the Crumlin Road. While following Cliftonpark Avenue would seem a stronger line this would impact upon a number of residents on one-side of Cliftonpark Avenue.

The DUP estimates this change could leave the Shankill ward over the upper limit. However, as the proposed Woodvale ward is below the average ward size there is scope for transfers between Shankill and Woodvale ward. Thus it believes the boundary between Woodvale and Shankill should move from Lawnbrook Avenue to Canmore Street. These streets are of comparable strength as readily identifiable boundaries. From Tennant Street to Canmore Street, the Shankill Road would act as the boundary between the two wards.

If this is an insufficient transfer the boundary could be adjusted further to Conway Street. The DUP estimates that Waterworks would still be within the limits. However, if a Waterworks is light it believes the line between Waterworks and Chichester Park could be adjusted in the Cavehill area e.g. move the line back from Willowbank Gardens to Hopefield Avenue. These two streets are comparable readily identifiable boundaries.

This would involve the transfer of the following streets from Waterworks to Shankill:

- Hillman Street
- Part of the Oldpark Road
- Part of the Crumlin Road
- Hillview Court
- Fairfax Court
- Yarrow Street
- Albertville Drive
- Century Street
- Manor Street
- Manor Court
- Mountview Street
- Mountview Court
- Southport Court
- Groomsport Street
- Alloa Street
- Annalee Court
- Bandon Court
- Summerhill Court
- Avoca Street
- Summer Street
- Foyle Court
- Shannon Street
- Liffey Court
- Bann Court
- Shannon Court
- Part of Cliftonpark Avenue

The following streets would be transferred from Shankill to Woodvale if the Canmore street option is sufficient:

- Lawnbrook Square
- Mountjoy Street
- Bellevue Street
- Sugarfield Street
- Part of Canmore Street
- Haddow Street

The DUP proposes further changes below to Waterworks. However, this proposal is not dependent on those other changes and should be given separate consideration.

### **Tigers Bay/Newington Peace-line**

This primarily involves the Waterworks and Duncairn wards. However, the scale of the changes mean a domino effect on other wards but the party thinks it has

found equally identifiable boundaries and in some cases better than previously proposed. Furthermore, if the LGBC accepts the proposal for northern expansion of the external boundary and transfer Lower Oldpark area it will provide greater flexibility to make adjustments in line with the Assistant Commissioner's recommendations on peace-lines.

The following changes are proposed:

### **Waterworks/New Lodge/Duncairn/Chichester Park–**

The Waterworks boundary should be extended by following the Antrim Road until it reaches Duncairn Gardens. It would go down Duncairn Gardens until it reaches the peace-line. It should follow the peace-line until it reaches the Limestone Road. It would then go up the Limestone Road until it meets the Antrim Road. It should then follow the Cavehill Road.

This would transfer the following streets from Duncairn to Waterworks:

- Part of Duncairn Gardens
- Part of Antrim Road
- Ponsonby Avenue
- Newington Avenue
- Newington Street
- Atlantic Avenue
- Baltic Avenue
- Pacific Avenue
- Oceanic Avenue
- Lothair Avenue
- Part of Limestone Road

**Chichester Park/Waterworks/Duncairn** – The Chichester Park ward should be extended past the present proposals of Willowbank Gardens down the Cavehill Road and Limestone Road until it meets the peaceline. It would then follow the peace line to the rear of Mileriver and Mountcollyer streets and then follow the fence through the park until it reaches the boundary with Fortwilliam ward and follow that boundary until it meets the Antrim Road again.

This would transfer the following streets from Duncairn to Chichester Park:

- Part of Limestone Road
- Part of Antrim Road
- Castleton Gardens
- Jubilee Avenue
- Camberwell Terrace
- The Glen

- Parkend Street
- Clanchattan Street
- Parkside Gardens
- Alexandra Avenue

The following streets would be transferred from Waterworks to Chichester Park:

- Part of Cavehill Road
- Rosemount Gardens
- Part of Willowbank Gardens

These changes would leave Duncairn under the lower limit. Therefore two areas should be transferred to address this issue with new readily identifiable boundaries.

**Duncairn/Fortwilliam** – The proposed boundary dissects a number of streets in the Northwood area. The DUP considers this division unnecessary. The Northwood streets are built upon a small promontory and this should be the basis of a readily identifiable boundary. The new boundary should break with the Skegoneill Avenue at Jellicoe Avenue following the boundary of the corner house then the promontory on which Northwood is situated around to the green wedge between Northwood Road and Seamount Drive until it meets the Shore Road. It is more readily identifiable than the use of Northwood Crescent and does not involve division of three streets.

The following streets would be transferred from Fortwilliam to Duncairn

- Part of Northwood Drive
- Part of Northwood Parade
- Part of Northwood Road
- Part of Northwood Crescent
- Part of Skegoneil Avenue.

**Duncairn/Innisfayle/Bellevue** – The present proposals use the Shore Road for a part of the boundary between these two wards (between Fortwilliam Park and Mount Vernon Road). It then follows the onslip until it meets the railway. The DUP proposes that the Duncairn boundary line should simply continue along the Shore Road until it reaches the boundary of the Metropolitan Church, a substantial landmark on the road and then follow the railway line. The Shore Road is a readily identifiable boundary comparable with the railway line and the grounds of the Metropolitan Church equally identifiable. The present proposals unnecessarily divide the Shore Crescent area between Innisfayle and Bellevue.

The following streets would be transferred from Innisfayle to:

- Part of Shore Road

- Part of Shore Cresecent

The following streets would be transferred from Bellevue to Duncairn to:

- Part of Shore Crescent

**Chichester Park/Cavehill** - The DUP estimates that the above changes could put Chichester Park near or above the upper limit. Therefore it suggests two adjustments.

Cooldarragh Park should move into Bellevue. This would involve the boundary line proceeding down the Cavehill Road until the boundary line of the Church of the Resurrection (a prominent local landmark) and the rear of Cooldarragh Park properties.

The second change would adjust the boundary at the Old Cavehill Road. The present proposals follow the Old Cavehill Road for the section between Henderson Avenue and Slievemoyne Park. The DUP proposes a new boundary line that follows the Old Cavehill Road from Henderson Avenue to the Antrim Road. It believes the Old Cavehill Road is a more readily identifiable boundary than Slievemoyne Park.

This would involve the transfer of the following streets:

- Cooldarragh Park
- Part of the Antrim Road
- Part of Slievemoyne Park

**Fortwilliam/Innisfayle** - The loss of Northwood could leave Fortwilliam under quota therefore a further adjustment is needed between Fortwilliam and Innisfayle. The line should follow present proposals along Fortwilliam Park until the junction with Lansdowne Road. The boundary should then follow the Lansdowne Road until it reaches the Antrim Road. The Lansdowne Road is a more readily identifiable boundary than the proposed property boundary lines.

The following streets would be transferred from Innisfayle to Fortwilliam:

- Part of Lansdowne Road
- Fortwilliam Drive
- Part of Somerton Road
- Somerton Park
- Alexandra Court
- Part of Antrim Road

## **'Derry' City & Strabane District Council**

### **Name**

The DUP is stunned that the LGBC is continuing to insist on the divisive and unacceptable proposal of Derry City and Strabane as the proposed name for this Council, particularly when non-contentious options are available and were previously proposed in a previous consultation conducted by the LGBC.

As the matter has been subject to a High Court ruling the position could not be more clearly defined and cannot understand on what basis the LGBC is over-ruling this judgement.

Indeed in recent days the Minister for Foreign Affairs in the Irish Republic, Michael Martin, has stated that the name Londonderry can be used on Irish passports.

Furthermore, the addition of 'regional' makes no sense whatsoever if applied to an area with an (incorrect) city and town name. Regional being added to the title would be appropriate in the context of a single geographical identifier e.g. Foyle or North-West.

The DUP is deeply disturbed that the LGBC and AC have adopted wholeheartedly the proposals that only enjoy support from one section of the community in terms of the name of the Council. It reminds the LGBC of the previous importance that was attached to consensus around the issues of naming this particular council area and how consensus plays some role in the work of the LGBC generally. It has significant concerns that this position seems to have been abandoned opting instead for one that at face value looks partisan.

### **External boundaries**

The DUP welcomes that the proposed external boundaries have not been changed.

### **Internal Boundaries**

The DUP is broadly content with the proposed internal boundaries.

## **Armagh City Banbridge and Craigavon Council**

### **Council Name**

The DUP welcomes the new proposed name.

### **External Boundaries**

The party opposes the proposal to amend the boundary between Mid-Ulster and this Council area. It details its concerns and alternative proposals in the Mid-Ulster section.

The DUP still proposes the transfer of Ballyward to this council area and Rathfriland to Newry City, Mourne and Down Council. This would have no net effects on the number of seats as it is a 1 for 1 transfer. It details its arguments around this in the Newry section.

### **Internal Boundaries**

The DUP notes the proposal to increase the number of Council seats to 41. The DUP comes at this proposal from a position of scepticism. In its first written submission it only proposed one extra seat in the whole of Northern Ireland as an essential part of this review was about efficiency in the new structures. However, it notes the arguments that the LGBC has presented. It also notes the opportunity for further improvements in boundaries across the Council area that the additional seat enables through its impact on ward size and limits. In this instance the DUP is persuaded that an extra seat is appropriate. It welcomes this and the other proposed internal changes.

## **Lisburn City and Castlereagh**

### **External and internal boundaries**

As set out in the Belfast section the DUP wishes Dunmurry to remain in the Lisburn and Castlereagh area, seeks an amendment at Gilnahirk and transfer of Forestside and Castlereagh Council offices. Our alternative proposals for how this could be accommodated and the Council area remain a 40 seat council area were set out in Appendix 1 of our previous written submission.

## **Newry City, Mourne & Down District Council**

### **Name**

The DUP welcomes the new proposed name.

### **External Boundaries**

The DUP believes the Ballyward proposed adjustments are insufficient and still believes the entirety of Ballyward should return to the Armagh City Banbridge and Craigavon Council area.

The Assistant Commissioner in his report focused on a single aspect of the DUP's argument around the AONB i.e. that in other parts of the UK a national park could have had multiple local councils and overly focused on a single example rather than the broad argument:

*"After investigation it can be confirmed that Mr. King's submission as to the Lake District is correct. However the Lake District comprises an area of in or about 2,292 square kilometres, which is greater than the area not only of the New District but also the areas of 10 of the 11 proposed Districts (only Fermanagh and Omagh being greater). The area comprised in the AONB is 570 square kilometres. It is suggested that it is therefore not surprising that the Lake District area falls within several Council areas. Further it is understood there is a Lake District National Park Authority which is an independent local authority covering the whole area and which acts as a Unitary Planning Authority."<sup>9</sup>*

The AC failed to address that no other AONB is receiving such treatment and the proposed council boundaries happily cut such areas across Northern Ireland.

As for the size argument, four of the UK's national parks areas are smaller or comparable with the Mourne AONB<sup>10</sup>:

- Broads
- Exmoor
- New Forest
- Pembrokeshire Coast

The Broads cuts across a number of Council areas and draws membership from two County Council areas and a number of district and city councils.<sup>11</sup> Exmoor Park cuts across a number of Council areas and draws membership from two County councils and two district councils<sup>12</sup>. In New Forest two county councils and two borough councils appoint members to the Park Authority.<sup>13</sup> Therefore,

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<sup>9</sup> Report of Newry City and Down Assistant Commissioner, Page 9

<sup>10</sup> <http://www.nationalparks.gov.uk/learningabout/factsandfigures.htm#phy>

<sup>11</sup> <http://www.broads-authority.gov.uk/authority/about-us/membership/appointments.html>

<sup>12</sup> [http://www.exmoor-nationalpark.gov.uk/index/looking\\_after/the-authority/members.htm](http://www.exmoor-nationalpark.gov.uk/index/looking_after/the-authority/members.htm)

<sup>13</sup> [http://www.newforestnpa.gov.uk/index/aboutus/our\\_people/members/local\\_authority\\_appointees.htm](http://www.newforestnpa.gov.uk/index/aboutus/our_people/members/local_authority_appointees.htm)

even the smaller parks of comparable size do not have coterminous council boundaries nor is it viewed as a requirement.

Recent comments by the Environment Minister made clear how open key questions around a National park and possible planning controls are:

*“Before that, however, we first need to think about what a National Park is and decide whether or not we want National Parks in Northern Ireland. And if so, what they would be like. I am coming to this with an open mind. I want to learn from the experience elsewhere...Given in 2011 we will be devolving planning powers to councils, I will also be keen to see how the National Park Authority operates with only very limited planning powers.”<sup>14</sup>*

Thus the two grounds the Assistant Commissioner based his rejection of Ballyward’s transfer upon are flawed. The DUP reiterates that this proposal seems to be driven in the expectation of significant decisions that have yet to be made. These important decisions lay with the Department, Executive and Assembly not the present LGB review.

This proposal would result in a net change in the number of seats in both the Council areas. However, the DUP believes that the Rathfriland ward should be transferred to Newry City, Mourne and Down Council, this would mean no change in the respective Council sizes. The Rathfriland area is contained within the South Down Westminster constituency which is a coterminous with the Council area. This would mean the northern section of the Rathfriland ward boundary replacing the southern section of this ward as the inter-Council boundary line. The DUP believes the northern section to be as strong/readily identifiable as the southern and an appropriate inter-Council boundary.

### **Internal Boundaries**

The DUP notes the proposal for an extra ward for Newry City. The problem highlighted of areas on the periphery of the towns and cities being in rural wards are not unique when you systematically examine the boundary proposals across Northern Ireland. In many other Council areas this situation has been accepted rather than another ward proposed. The DUP reiterates it comes at all proposals for extra seats from a position of scepticism and has not been convinced that the arguments put forward for an extra seat in this Council area and the knock-on effects are restricted to one corner of the Council area. Therefore, the DUP is unconvinced by the arguments in this case and opposes the creation of this additional ward.

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<sup>14</sup> <http://www.northernireland.gov.uk/news-doe-300309-wilson-to-make>

## **Antrim & Newtownabbey District Council**

### **External Boundary**

As set out in the Belfast section the DUP wishes the Rathcoole area transferred to the Belfast City Council area. Our alternative proposals for how this could be accommodated and the Council area remain a 40 seat council area were set out in Appendix 2 of our previous written submission.

### **Internal Boundaries**

The DUP did not comment on the previously proposed internal boundaries as it focused on the broader changes. However, it must comment that the proposed Carnmoney Hill is a complete absurdity. This ward should not stand as proposed. It would remind the LGBC that its alternative proposals would address this issue.

## **North Down & Ards District Council**

### **External Boundaries**

The DUP welcomes the decision to leave the external boundary unamended.

### **Internal boundaries**

The DUP warmly welcomes the new proposals for the internal boundaries of this Council. It commends the Commissioner and Assistant Commissioner for taking on board the broad consensus for changes in this council area in particular the decision not to proceed with the proposed Whitespots. A council with more equal representation and wards with more readily identifiable boundaries is now proposed and should be seen as a textbook example of how a boundary consultation can work.

## **Fermanagh & Omagh District Council**

### **External Boundaries**

The DUP welcomes the decision to maintain the proposed external boundaries.

### **Internal boundaries**

The DUP is content with the revised internal boundaries.

### **Other matters**

The DUP had sought to change the name of the proposed Lisnarick ward as it did not actually contain Lisnarick. However, in the revised proposals it now does so the point is now irrelevant.

## **Causeway Coast Council**

### **Name**

The DUP does not agree with the addition of the Glens to the name. This creates too strong an eastern bias in the name of the Council area that it does not believe is justified plus it is inaccurate as not all the Glens are contained within the Council area.

### **External Boundaries**

The DUP welcomes the decision to maintain the proposed external boundaries.

### **Internal Boundaries**

The DUP is broadly supportive of the proposed internal changes in particular the revised proposals for the Ballymoney area.

### **Other matters**

It does not accept that Lurigethan is a more identifiable name than Cushendall. It believes that a significant proportion of the population will have never heard of Lurigethan but will have heard of Cushendall.

## **Mid and East Antrim District Council**

### **Name**

The DUP welcomes the new proposed name for the Council.

### **External Boundaries**

The DUP accepts the basis for the rejection of its proposal to make a minor amendment to the external boundary.

### **Internal boundaries**

The DUP is broadly supportive of the proposed internal boundary changes in particular the revisions to Broughshane.

## Mid Ulster District Council

### External Boundaries

The DUP is bemused by the proposed changes to the Council boundary. It understands that in the absence of public hearing evidence the Assistant Commissioner was left with no option but to rely solely upon written submissions. However, it believes that this had led to an over-estimation in the significance attached to the written proposal to change the external boundary. It could be said, without fear of contradiction, that no other single submission has led to the degree of change that has resulted from Mr McAlinden's letter.

The DUP objects to this proposal on a number of grounds:

**Size** - It will involve an unnecessary transfer of electors from one of the smallest councils to one of the largest.

**The contradictory nature of the revised Killyman Ward** – The revised proposal uses the Blackwater River as the readily identifiable boundary. However, this leaves Killyman under quota. To increase the electorate of the revised Killyman ward entails redrafting the boundaries with Washing Bay and Moy. However, the transfer of part of Washing Bay into Killyman can only be achieved by breaching the Torrent River as a boundary. The Torrent River is used as part of the boundary between Killyman with both Washing Bay and the revised Coalisland South but as far as the DUP can determine this is breached simply for numerical convenience. Thus to accommodate one readily identifiable boundary – the Blackwater – another has to be ignored, the Torrent River, despite its extensive use as a ward boundary.

**Peatlands Park** – The Party believes that this substantial set of forests and bogs acts as a reinforcement of much of the existing boundary, undermining the case for it to be abandoned. It represents a green wedge.

**Ward Imbalances** – To accommodate this change there is an impact upon 6 wards (3 in each respective council area). While within the limits, it leads to three below average wards being created in Mid-Ulster and three above average wards in Armagh City, Banbridge and Craigavon. The DUP considers this inequality as unnecessary and unacceptable.

**No Support** - There is no significant support or demand for this proposed change. None of the councils involved sought this change in their original proposals. No political party sought such a change. No local community or civic society organizations sought this change. Indeed it is our expectation that there will be local opposition to this proposal. The Party is aware of a local petition opposing the proposals which no doubt the LGBC will receive in due course.

**Dungannon orientation** – The community is orientated towards Dungannon and has been for some time. The local RC Dungannon parish structure includes Clonmore. Also Clonmore has been included with Dungannon council structures for decades regardless of the County line.<sup>15</sup>

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<sup>15</sup> See List of Townlands and District Electoral Divisions and Rural Districts journal 1960

**County boundary** - The county boundary is not a statutory consideration for the boundary.

The DUP proposes there should be no transfer of Killyman into Armagh City, Banbridge and Craigavon Council area. It proposes that the boundary between Killyman and Washing Bay should be the Torrent River (to where it meets the Coalisland South ward) and that the original proposals of the boundary between the Moy and Killyman ward stand. The revised proposals between Killymeal and Killyman should stand.

### **Internal boundaries**

The DUP strongly welcomes the revised proposals for Coalisland South and Killymeal and believes these must remain regardless of the changes it proposes above.