

Local Government Boundaries Commissioner for Northern Ireland

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**Assistant
Commissioner**

I was a solicitor in private practice in a Belfast city centre for over 30 years. I retired as Senior Partner of that firm, and subsequently I took a call to the Bar of Northern Ireland. I am an Assistant Boundaries Commissioner. Assistant Boundaries Commissioners were appointed by the Minister of the Environment to conduct public hearings into the Provisional Recommendations of the Local Government Boundaries Commissioner as to the boundaries and names for the eleven new District Councils and also as to the boundaries, names and number of wards in those districts.

I am the Assistant Boundaries Commissioner assigned to chair the public hearing for the district provisionally designated the name of Newry City and Down District Council and it is being held here today in the Slieve Donard Hotel. I am now formally opening this public hearing.

You may call me Mr. Chairman, Mr. O' Reilly, or whatever title you are comfortable with. It is my intention that these proceedings are as informal as possible having regard, of course, to the important issues involved.

I am completely independent of the Local Government Boundaries Commissioner, and it is not part of my function to explain his recommendations. In fact, it is my function to listen to evidence given to me at this public hearing and, taking this evidence into account and written representations made prior to and at the public hearing, to make a report of my findings with my recommendations to that Boundaries Commissioner. I am then required to submit my recommendations within four weeks of the close of this hearing.

Now I am being assisted in the running of this hearing by a team here today. I will briefly identify them for you in the event that you have cause to speak to them about various issues that arise. The team is comprised of John McAreavey of the Local Government Boundaries Commissioner's office, Gerard Moran and Chris Davidson from Land and Property Services who can assist with mapping and general queries in relation to boundaries and so on and Ann Jamison from Morrow Communications whom you would have already met.

The hearing is scheduled to last for two days but I will review the situation as the hearing progresses.

It is my intention to start at ten am to be flexible as to the time of breaking for lunch. I anticipate a lunch break sometime between twelve thirty and one thirty and in relation to finishing I would not anticipate finishing before four o'clock.

It is not my intention to get involved in adjournments except for any adjournment which seems appropriate to enable the hearing to run smoothly or to facilitate a speaker.

I have asked if there is any new documentation that is being produced, even at this time, if it could be given to a member of the team so that I can see it prior to any evidence being given.

I will move on to maps and documents. Copies of the Commissioner's Provisional Recommendations are available for inspection here, as are copies of the Procedure Guide which governs the conduct of the hearing.

There are copies of the written representations relating to this district which have been made to the Commissioner's Secretariat during the eight week consultation period which ended on the 12 November.

I advise you that this hearing is being recorded and a transcript will be made available on the Commissioner's website in due course. If you cannot access the website and wish to receive a printed copy of the transcript, all you have got to do is leave your name and contact details with a member of the team.

There are maps on display showing the eleven council model, the boundary proposals for this government district and the adjacent districts and the team will facilitate you in relation to an understanding of them. They are here, not only to advise me on the detail of boundary proposals brought forward at this hearing, but also to assist all of you in making any representation in relation to any mapping matter.

The purpose of this public hearing is to consider oral representations concerning the Provisional Recommendations of the Local Government Boundaries Commissioner. If you have a view, this is an opportunity to be heard and recorded but it is important to make it very clear that you cannot reserve your position. Once the hearing is closed no further submissions/representations or otherwise can be received by me and you must also bear in mind that in making the recommendations, the Local Government Boundaries Commissioner is constrained by the rules set out in the

legislation, as I am, and they are shown again for everyone's benefit at the back of the Procedure Guide.

Also relevant to point out, I think that there are issues which are clearly outside the scope of the hearing. Several I would mention are: the number of new district councils; the grouping of the existing councils from which the new councils are constituted; the location of the headquarters for any new council; the financial consequences of boundary changes; the District Electorate Areas into which the proposed wards will be combined; or again the city or borough status of any new councils. It really would be helpful to all of us if those issues were not specifically raised.

I have received many very helpful written representations and I have already considered many of them, as part of my preparation for the hearing, and I will certainly be taking them into account in my report to the Commissioner.

If you have already made a written representation there is no difficulty with you elaborating on those representations, but I will not be assisted by simply repeating any written representation. It really is not considered necessary just to read out what has been submitted, though again clearly in this type of case, it is helpful in an oral representation to refer to that written representation that you have made in support of some proposition.

Again, I emphasise that I certainly will take full account of all representations that have been made regardless of whether they are referred to in this hearing or not. Again, though, if there are any additional proposals supplementing any written representation then again I have no difficulty with hearing a proposal additional to the written representation.

With regards to site visits, it may be necessary for me to go and look at some areas which are referred to during the course of this hearing, and if there is a particular boundary or feature that you think would be appropriate for me to look at, please draw my attention to it and if I consider it appropriate and necessary I will certainly try to go and see it.

When you entered the room you were given the opportunity to indicate whether or not you wish to speak. There will be a short adjournment when I finish so that anybody who has not done so could sign the register and update the member of the team.

Regarding the order of speakers, I would ask everyone to be as flexible as they can, as I will be. I will try to accommodate people as far as reasonably possible. I appreciate there will be people with work commitments or personal difficulties who wish to get away early or cannot stay for long. I will try my best to give them priority.

Having said that, there is a custom in hearings that Members of Parliament, local councillors, council officials, and representatives of groups and organisations would take precedence over others, and again subject to the flexibility that I have mentioned, I would try to tie in with the custom.

[Housekeeping announcement]

With regards to the procedure that we follow in relation to the oral submissions, if you would state your name and if there is a title you wished to be referred to as, also mention that. I would also like to know if you are speaking in a personal capacity or a representative capacity. Please do not use abbreviations for the transcribers in case they have difficulty in picking them up. As I said, in any oral submission that you are making, it will be very helpful to me if you state the reasons you are taking a particular position, any counter-proposals that you may wish to make and the reasons for your counter-proposals.

When you have finished your submission, I may ask some questions arising from your submission to help me gain a better understanding. Other people may wish to put questions to you but any questions will be put through me and I will rephrase the questions; the questions will all go through the Chair.

The important thing today is to hear any information that you feel is relevant in respect of the Commissioner's proposals, hear any counter-proposals and conduct this hearing as efficiently and effectively as ever possible. I intend to follow the procedures that are set out in the Procedure Guide which you all have.

I am going to adjourn these proceedings for some moments to enable us to confirm that we are in a position to proceed.

ADJOURNMENT

**Assistant
Commissioner**

The first speaker is Councillor Michael Carr.

Michael Carr

Good morning, my name is Michael Carr, local councillor in Newry and Mourne representing the Crotlieve area. I have made a written submission to the Commissioner and primarily my submission is to support the case being made by both Newry and Down District Councils that the new Council area should consist of 45 wards. I would also like to highlight illogical issues within the current proposals. I will be brief because the diagrams, calculations, charts and maps within my presentation clearly show the anomalies I wish to highlight, which should be given serious consideration when the Commissioner sits down to re-draft the wards. The first point I would like to make is that the map Newry and Down Local Government District published in the local newspapers as part of the Commissioner's presentation pack contained the names of 39 of the 40 wards. Warrenpoint was not named and it caused a great deal of annoyance in the community. Warrenpoint residents already feel that they have been disadvantaged since the last review of local government. This is the worst possible start to the new arrangements as it is interpreted, the bigger the Council gets the worse off they will become. The second point is the number and layout of wards has also caused great concern, particularly with the ward of Seaview being completely removed. The numbers of electors and population of Warrenpoint justify two wards and to change as per the Commissioner's proposal will have a serious detrimental effect on peoples' lives in addition to the reduction in their political representation. Seaview is the most densely populated area in the region of Mourne and one of the highest in Northern Ireland. Seaview, with 24.44 persons per hectare, is 20 times greater than the Northern Ireland average of 1.19. It is 25 times greater than the Newry and Mourne average of 1.19, and 34 times greater than its neighbouring ward of Burren and Kilbroney. Given the extremity of these figures alone I would suggest Seaview showed up in the starting point of this exercise in Newry and Mourne, and definitely in the District Electoral Area of Crotlieve and never should have been split into three other wards. In effect, Seaview has been dissected into three different wards and obliterated. I have already made the point that political representation is a concern also, and those figures are as per the Northern Ireland Neighbourhood Information Service. The third point I would like to make is the ward boundaries should be drawn from centres of population outward. This logic not only applies to Warrenpoint, but to the likes of Newry and Kilkeel and on the Down side presumably Downpatrick, Castlewellan and Newcastle. Again, there is evidence to support that in the presentation. We appear to have started somewhere in the middle of the countryside and worked towards the areas of population.

The fourth point is that the electorate numbers in July 2008 justify Newry and Down District Council having 45 wards. I have also made the point in the presentation that I think the calculation should be done without Belfast for the rest of Northern Ireland, i.e. take the Belfast numbers out of it and divide the rest by 400, in which case there's a deviation in Newry City and Down of 14.7, nearly 15%. The fifth point that I wish to make is I believe in most cases, if not all, one should be able to drive around the boundary of a ward. I have also given examples, particularly in my own local area of Warrenpoint, where the ward boundaries are going up cul-de-sacs, across fields, through people's gardens. I do not think it was necessary, and it appears to me to have been done to keep all of the variations within the 10% target. To me, that is where there is no logic in this. I have given one example of the boundary running up the Clonallan Road in Warrenpoint rather than going to the crossroads at the head of the Well Road. It cuts across fields, through people's houses, there is not even a road way, no edges of the road and that is as per page eight of my submission. Point 6 is that I do believe that townland should be protected, but not at the expense of populated areas. I think that the proposals as they sit at the moment already cut through 50% of the townlands that we have in the District Electoral Area of Crotlieve. I have to say in trying to investigate this, it was extremely difficult to find any information on townlands, including searching on the OSNI website. I believe that one of the criteria used by the Commissioner was to protect townlands as per number 15 and Part III of your handout today; 'A townland shall not, except where in the opinion of the Commissioner it is unavoidable, be included partly in one district or ward and partly in another' but information on where those townland boundaries lie at the moment is almost impossible to establish. Finally, point number 7 - I do believe that the wards and District Electoral Areas should have been drawn at the same time and that also covers the point about working from areas of population outwards and I would refer you to page 12 of my presentation.

**Assistant
Commissioner**

Michael, firstly let me say that I found your presentation very helpful, there was a lot of time and effort and work went into it. Can I just clarify a couple of points arising from submission? Why do you say that ward boundaries should be drawn from centres of population? I think you are maybe right to exclude Belfast from when you look at the other districts, but if you take Belfast it will be very difficult to draw ward boundaries from the centre of Belfast wouldn't it?

Michael Carr No, I do not think so. You have got the foundation already with the current wards that sit there at the moment - 580 or whatever there is at the moment. I was looking at this specifically in relation to Crotlieve, where we have seven wards. This proposes that comes down to six wards, and the one ward that has come away from that is Seaview which is the most highly, densely populated. The other thing I would refer you to is the last page of that where we appear to be moving the whole of Crotlieve westward for some reason and I am not sure that that is a good idea. For example, the current wards are Derryleckagh, Mayobridge, Spelga, Burren and Kilbroney, Rostrevor and the two Warrenpoint wards - Clonallan and Seaview. I think that if we were reducing those seven to six, the two Warrenpoint wards could be enlarged into Burren and Kilbroney, Rostrevor could come into Burren and Kilbroney, even Spelga, now Hilltown, Mayobridge. I think the one in the middle probably should have been sacrificed and taken into other parts because it is already a rural ward and if you go by the figures of where towns are - some of the areas that we have at the moment do not even register as towns and villages on the website NINIS (Northern Ireland Neighbourhood Information Service).

Assistant Commissioner You have also made the point in the paper about the concern you have about the boundaries going up cul-de-sacs and through gardens and so on. Would it be possible for you to actually highlight those to our property services men today?

Assistant Commissioner Yes, there is nothing else - would anyone else like to raise anything? Thank you Michael, that was very helpful and appreciated.

Michael Carr Thank you very much

Assistant Commissioner Good morning, Mr Cunningham.

David Cunningham Thanks, for the record my name is David Cunningham. I am chair of the Confederation of Community Groups and I am here in a personal capacity today. I would like to thank the Commission for this opportunity to make my representation. The area I am concerned with is Newry and District. As a community activist, I am aware of the deprivation that is in five areas of Newry at the current time. These areas receive much

needed Neighbourhood Renewal monies which go a long way to help alleviate deprivation, with programmes of health, education and social development. My view, after studying the proposals in the newspaper, is that the rural area of Newry is coming into the urban area. My fear is that the ruralisation of the Newry areas will result in Newry Central areas not being able to achieve funding from central government, which they now receive. My concern is not a political one; it is more about the welfare of people in the deprived areas of Newry. I would like to take this opportunity to ask that the Commission look at not bringing rural areas into Newry, but in fact make all the wards in Newry urban. I would suggest that the rail line in Newry is used as a boundary along with the proposed Western by-pass. I would also propose that Ballyholland, which is currently in a ward outside of Newry, is moved into the Newry area. Chairman, that ends my submission.

**Assistant
Commissioner**

You say you have a fear about Newry Central not receiving funds as a result of these ward proposals, have you any reason for that?

**David
Cunningham**

Yes, the Neighbourhood Renewal monies that these areas receive are based on a civil service format called the Noble Indices which receives information from the DHSS about how many people in a particular ward are on benefits, in receipt of DLA and so on. It would be my fear that if the Newry rural areas came into the centre of Newry, that that would disqualify areas which are now in receipt of Neighbourhood Renewal money. Chair, I will just give you one example of Drumalane in Newry. It is now currently in receipt of much needed Neighbourhood Renewal money. If the proposals that were in the newspaper go through, it would put Drumalane in Fathom ward which stretches all the way to the border. My fear is that this would then exclude Drumalane from receiving any grants in the future.

**Assistant
Commissioner**

Thank you David. Professor Benoit and Mr Keogh, Barrister at law?

Michael Keogh

I am instructed by the firm of McShane & Company who have commissioned an expert report from Professor Benoit and what I am proposing is to introduce him. He will speak to that report, elaborate on some aspects of it and then I will make a very short purely legal submission. Mr McShane, the Principal of the firm, is also here today. Professor Benoit.

Ken Benoit I am Professor Ken Benoit at Trinity College Dublin in the Department of Political Science. I have prepared a brief overview or of the written report which I have submitted on behalf of Newry City and Down.

Assistant Commissioner So your qualifications are nearly longer than the report?

Ken Benoit The objectives of this overview were quite simple, it was to assess, on the basis of population figures, why the new Newry City and Down District Council should have 45 wards instead of 40. The justification is based on a numerical analysis of the ward electorate sizes as provided in the Commissioner's Report and I focused on the numerical balance with regards to two aspects. The first is the attempt to achieve equality in representation within the new district across wards, so comparing wards within the new Newry City and Down District. The second basis was to compare the typical ward size in the new district to that in the other new Local Government Districts across Northern Ireland so comparing it to the other ten and, as I will show shortly, comparing it to the other nine which means excluding Belfast as being something of a special case. The standard in the Commissioner's Report is that any variation of the ward electorate of less than or equal to 10% can be considered an acceptable variation. In other words it can be considered that wards with electorates of those sizes or deviations of less than plus or minus 10% can be considered substantially the same, and it is true that the proposed wards within the new Newry City and Down District Council would meet this standard, so that is not in dispute. However, within this standard there are a number of wards that are just at the limit of this standard and for a number of reasons that are outlined in our submission, and in Councillor Keogh's own submission, it would seem desirable to enforce a more rigorous standard when possible. I have proposed and outlined an alternative standard which keeps the spirit of the original standard but argues that it should be carried further. This standard has two aspects; the first is that we should attempt to minimise the variations at the limit of the 10% and this can be done by focusing on the spread, or in technical terms, the variance of the ward sizes. In other words, the same two districts with wards that are either very tightly clustered around an average say plus or minus 2% can have the same average as a district where all of the wards are clustered around plus or minus 10%, those two districts can have the same average size even if one of them has wards whose populations are very tightly clustered around the average, versus the second

hypothetical district where the ward sizes are spread out towards the extremes of the plus or minus 10%. The average of those two districts can be the same; how they would differ is in the variance of their wards so one of them would have wards that are very spread out in size, one of them would have wards that are very uniform in size and the first aspect of the alternative standard would be to attempt to reduce this variance - in other words to achieve more uniformity of ward sizes within a district when possible.

**Assistant
Commissioner**

Sorry to interrupt again - more uniformity spatially or numbers?

Ken Benoit

I am speaking only numerically. It has spatial implications, of course, but I am making my argument simply on a numerical basis. The second aspect of the alternative standard outlined in my report is that the spirit of this plus or minus 10% limit should also apply when comparing the average ward size of the proposed district to the averages of other proposed districts. The average ward size of Newry City and Down should not be too different from the average ward size of the other nine, or if you include Belfast ten, districts across Northern Ireland, so the second aspect is to try to make the typical district more uniform across the whole of Northern Ireland. The basic idea behind these two alternative standard aspects is that uniformity in representation is desirable and should be achieved whenever possible. In other words, if we can get it below 10% it should be achieved.

Some facts of the new proposed district relative to other districts - and I am simply stating things that are outlined in my report. The average ward size, based on 40 wards is 2,680. This is a higher average ward size than every other district except for Armagh City and Bann, and, of course, after Belfast. If we exclude Belfast, this makes the Newry City and Down District the second highest in terms of average ward size. If we exclude Belfast, the average ward size is 2,337. This means that compared to other districts in Northern Ireland, the 40 ward Newry City and Down is nearly 15% above the Northern Ireland average.

**Assistant
Commissioner**

So really if I put a little note on your Appendix to say all of the districts and Newry City excluding Belfast and then finish off at 2299.2, have I interpreted your document, the figures correctly?

Ken Benoit Yes, you have. If we were to increase the wards in Newry City and Down to 45 then the average ward size would be 2,383 which is the second bold line in Appendix A. This is still above the median districts average ward size so this is still on the upper, in the upper half of all districts in terms of the average size

Assistant Commissioner In all other districts excluding Belfast?

Ken Benoit Yes. Only one other, this would only change in position on the list if you were to take that second bold line and put it into the top of the list on Appendix A then only one district would move ahead of Newry City and Down in terms of...

Assistant Commissioner That is Armagh City and Bann.

Ken Benoit Then Ards and North Down would move ahead of it, the Armagh City and Bann is already ahead of it and would stay ahead of it.

Assistant Commissioner And this is on the recalculation?

Ken Benoit Yes, with 45 wards it would still, it would go from being 3rd on the list with Belfast to being 5th on the list.

Assistant Commissioner And that is providing of course that the other wards change too?

Ken Benoit That is correct.

Assistant Commissioner I understand that now I think.

Ken Benoit So the point here is if you increase the ward size to 45 then it would still be a relatively overpopulated area or under represented if you are an elector. It would still be one of the larger average ward profile districts. If we move to comparing the variation of wards within the district, not across Northern Ireland, but within Newry City and Down then we have to look at this notion of the spread of districts, or in technical terms the variance or the standard deviation of the districts, which I have outlined in Appendix B.

**Assistant
Commissioner** Is that Appendix B or C?

Ken Benoit It is both actually. Appendix A also lists the standard deviation which is a summary measure of the dispersion of the ward sizes in what I thought was at least a less technical version in Appendix B. This does not require a formula to understand the standard deviation, Appendix B compares the bottom 10% of the ward sizes to the top 10%. That is also known as a percentile. In other words it compares the 4th ranked ward size to the 36th ranked ward size. Instead of looking at the largest and the smallest, which could be extreme, here we have looked at 10% which is a bit more typical. If we compare either using this top and bottom 10% as in Appendix B or using the standard deviation as in Appendix A then we see that the variance of the wards in Newry City and Down is very high relative to others, it is very spread out. You can see this simply from the figures in Appendix C, the percentage of deviation from the average; it is true that it is less than 10% and negative 10% but there are many wards whose values are very close to that limit. Bessbrook, when it is rounded off, is 10% above the average ward size. There are five wards that are 9% above the average.

At the bottom of the list there are six wards that are 7, 8 and 9% below the average and this is what I mean by the spread so...

**Assistant
Commissioner** Can I just interrupt you again so for my clarification Appendix A and Appendix B are showing 3rd on both of those, on both of those formulae?

Ken Benoit That's right and I would also point out that in Appendix B the difference between the top and bottom 10% of 436 electors, when compared to the average ward size, is a 16.2% difference. Four hundred and thirty-six is 16.2% of the average of 2,680.8, so once again we have gone substantially beyond the spirit of this difference of 10%.

**Assistant
Commissioner** Can I ask you Professor to let me have your views on something on this 10% that has been floating around with these figures; the 10%, where does it start from? You know you are playing around to show in fact really it is not 10% it seems from the lowest to the highest, it is very much more; is there very much more than 10%? What is your rationale for that? Would that be the normal way of looking at such figures?

Ken Benoit It is the normal way to look at it using the average as a baseline, which is also what I have done here, but in comparing the extremes the objective is to show just how big 10% is. That is a very large difference, when it comes to electoral geography, having that tolerance is very high and it allows for differences of up to 22% as outlined in Councillor Keogh's report.

Assistant Commissioner I think what Professor what I'm trying to establish in my mind is most people here, I suspect if you say 10%, something is 10% you divide by 10 and that is the answer. That is what the difference is you know: you have used the words electoral geography. Would it be normal in electoral geography not to look at that basic and simplistic approach to a 10% or 5% or 20% variance, but 10% floated around as has been, what in electoral geography as an expert would you tell me would be the norm in assessing what a variance is?

Ken Benoit Something closer to 5% would be closer to the norm in other contexts.

Assistant Commissioner Yes, but then when you do the variance that you finish up with 10% when you go in to analyse your papers. In fact, I think you would be saying to relate it back to the language the rest of us are more familiar, that the fact if 10% was taken from the lowest to the highest that is really where the 10% figures should come from or am I putting that too ...?

Ken Benoit Yes, that is absolutely how I would say it as well, so if the standard were plus or minus 5%, the maximum distortion would be approximately 10%. If it is plus or minus 10% then the maximum distortion is around 20%, depending on how you consider it. So the basic point in looking at the variance of ward sizes within the district is that, with 45 wards, a uniformity would be more easily achieved, because there would be more wards to allocate the population to. The conclusions that I would draw from this analysis is that with 45 wards in the new district, the average ward size would be more in line with that found in other districts across Northern Ireland so a standard of equal representation across Northern Ireland would be better achieved.

Newry City and Down having 45 wards would reduce the non-uniformity or variation of ward sizes within the district, and this would better meet the standard of representation within Newry City and Down. It also seems from my analysis, although I have

not focused on this in depth in my report, that there is nothing natural or historical in the ward boundaries as they have been drawn that would provide a barrier to re-drawing them for 45. In fact, it seems quite the opposite from the submissions we have already heard. Many times in electoral geography there is a reluctance to re-draw boundaries because they have been used for a long time or because they represent natural boundaries. That is not the case here.

Assistant

Commissioner

Professor, while it is not part of your brief, you do accept that there are other constraints that a Commissioner has in relation to numbers. It is not like dividing up a square and putting a line across and a line across you know, so it is not just as simple as maybe the figures sometimes make it look, so you are making a case for 45?

Ken Benoit

Yes.

Assistant

Commissioner

What would you say if in fact the Commissioner were to accede to that request with somewhere like Armagh which in your figures - you pointed out they would therefore only, if they also made a similar Application, would also only get 45 and again on your own figures would it not be the situation that they would be under-represented?

Ken Benoit

Yes, they are.

Assistant

Commissioner

They would be?

Ken Benoit

In fact on the basis of numbers, 45 would be the minimum.

Assistant

Commissioner

If they have both got 45, then in fact all the arguments, the analysis you have put to us today, this district comes 3rd in both your analysis, Armagh actually comes 1st and 2nd.

Ken Benoit

Yes.

Assistant

Commissioner

In the two analyses, therefore, without doing any figures, it just seems to me again a matter of simple arithmetic, they would certainly be under represented in your terminology, is that a fair?

Ken Benoit

Absolutely.

Assistant Commissioner Thank you very much, Professor I found that very helpful.

Ken Benoit You are very welcome.

Michael Keogh Mr Chairman, there's been a lot of discussion already about the plus or minus 10% now.

Assistant Commissioner Yes, Mr Keogh.

Michael Keogh It is important to realise that this is a figure that was chosen by the Commissioner. In the paragraph where he explains that plus or minus 10% a greater range than that could not be regarded as substantially the same, he does not actually say anywhere that less than plus or minus 10% is substantially the same and he does not give any reasons whatsoever for choosing that figure. Now 10% might not seem an awful lot to the man in the street, but when you scrutinise what is meant by a variation of plus or minus 10% above or below the average, I have done a simple calculation in my submission which shows that allows for the possibility of one ward at one extremity which is 22% greater than another ward at the other extremity, and it is very difficult to see how that those can be regarded as substantially the same.

Assistant Commissioner I think that if I am interpreting your expert evidence correctly, what in fact I understand the Professor to be saying was that in that particular example you have given there is not a 10% variation, it was a 22.8% variation.

Michael Keogh Yes.

Assistant Commissioner In terms of, not in our ordinary simple layman's terminology, but in electoral geography - I think that's the point, isn't it?

Michael Keogh Now my submission is a purely legal submission and it focuses essentially just on two points of administrative law. By the way, in paragraph 10 there is a misquotation. I mentioned the Wednesbury case but it is 1947 Volume II All England Reports - the II has been omitted. It is a well-established rule that a decision maker in the position of the Commissioner is obliged to take into account all relevant matters. He does not seem to have taken into account the respective sizes of the various

electorates. He has discretion to allocate between 35 and 45 wards to any particular district, but he does not seem to have exercised it at all. He does not seem to have taken into account sizes of electorates.

Assistant

Commissioner Is it not, if you go to Regulation 18 in the Rules part III, is it not clearly set out that he is given by the legislation a base start in the words *shall be 40*.

Michael Keogh Yes, but although 40 is the starting point the legislation does give him a discretion to increase or decrease that plus or minus 5 and it seems very strange that all ten of the districts outside Belfast finish up with the same number of wards regardless of the wide variation in their respective electorates.

Assistant

Commissioner But you will acknowledge that it is not cutting a piece of paper in two?

Michael Keogh I do, I certainly acknowledge that. Now the plus or minus 10% guideline which is adopted seems to be little more than a rule of thumb which the Commissioner has adopted without any explanation whatsoever, and its infirmities have been explained in some detail by Professor Benoit.

The reported cases on administrative law are replete with examples of Local Authorities and other decision makers fettering their discretion unlawfully, whether it is by accepting some arbitrary guideline, following some rule of thumb or following some pre-ordained policy. I do not propose to read out what I have already submitted in writing, but I have in my submission set out a summary of that rule adopted from one of the standard texts, Wade & Forsyth, and from the very many reported cases I have chosen just two as by way of illustration and they are dealt with in my submission.

Assistant

Commissioner The Commissioner does acknowledge that he has taken them into consideration and come up with the 40 figure in his Provisional Recommendations - but you would be saying to me that in fact that you don't believe that he has?

Michael Keogh It seems impossible; he seems to have simply adopted this rule of thumb and followed it blindly.

Assistant

Commissioner What rule of thumb? What figure would you come up with?

Michael Keogh Plus or minus 10% giving rise to a possible deviation across their entire range of 22% is certainly not an acceptable rule as Professor Benoit just said. Perhaps plus or minus 5% which would give a deviation across the entire range of slightly over 10%.

Assistant

Commissioner But even then if you have done that under your argument you could still be saying that it could be unreasonable?

Michael Keogh No, what I am saying is that what he should have done is examine each district on its merits and not rely so totally on this rule of thumb which he adopts at the outset without any explanation.

Assistant

Commissioner I am calling it a rule of thumb because you have called it a rule of thumb. I think I would probably call it some sort of a marker that he had.

Michael Keogh If that is the case then in my submission he has adopted the wrong marker.

Assistant

Commissioner The wrong marker, but in your submission he could not have adopted any marker because he would be fettering his own discretion then Mr Keogh.

Michael Keogh No, it is just that if he had adopted a marker and provided carefully considered reasons for adopting it - that would have made the situation somewhat different. Perhaps the simplest thing to do is not to adopt any marker but just to do the best he can in the case of each individual district to keep the numbers as substantially the same as possible. It may be that doing it that way, there might be occasional one-off deviations that would not invalidate the exercise if he genuinely attempted to ensure that the electorate sizes were substantially the same.

Assistant

Commissioner You do not draw any distinction between the wording 'shall have regard to' and other language that could have been used by the legislation? You do not think that creates a lesser standard or a greater standard?

Michael Keogh In paragraph 19 he says: 'that within any one district there shall, as far as is reasonably practicable, be substantially the same number of local electors in each ward.' It is not just a question of having regard to the desirability but it does actually say there shall be the same number of electors.

Assistant Commissioner But there are, if there are effectively three to four competing rationales, which the Commissioner has to put together.

Michael Keogh Yes, I accept that but I am focusing on what appears to be fettering his own discretion by the adoption of an arbitrary rule.

Assistant Commissioner And that was why I was saying therefore under your analysis any figure is arbitrary.

Michael Keogh No, not necessarily, I think it will be, as I have explained it, I think it will be desirable to simply not have any figure and just the number is substantially the same, even if that meant for geographical purposes there were occasional blips or occasional deviations. That would not invalidate the exercise. If, however, we must adopt a rule of thumb, certainly plus or minus 5% would be much more acceptable and reasonable than plus or minus 10%. It is for those reasons on behalf of Newry and Mourne Council and Down District Council that we advocate that his discretion to increase the number of wards by up to five should be exercised in the case of Newry City and Down Council.

Assistant Commissioner Mr Keogh that was very helpful. Thanks very much. Thank you Professor.

Assistant Commissioner We are going to deviate from our procedure to facilitate Mr Kennedy.

Danny Kennedy Good morning, Mr Assistant Commissioner. Danny Kennedy, MLA, and I am here representing Newry and Armagh Ulster Unionist Association. My colleagues, I understand, in the Ulster Unionist Party in this particular area, South Down, will be making a presentation tomorrow.

Assistant Commissioner Can you clarify for me then, do I have a written representation from Newry and Armagh at the moment?

**Danny
Kennedy**

Yes. This, I suppose Mr Assistant Commissioner, as Henry VIII is reputed to have actually said to one of his wives, this will not take long.

The principal representation for the new council area described as Newry City and Down District Council will be dealt with by my colleagues in the South Down Association on behalf of the party.

We have two principal points that we would bring to your attention in terms of the Newry and Armagh Ulster Unionist Party Association. We are broadly supportive of the view already expressed by Newry and Mourne District Council that the number of proposed council wards should be increased from 40 to 45. Secondly, there is the issue of the ward of Newtonhamilton, which is currently proposed to remain in the Newry City and Down District Area. Our submission is that it would be better placed in the new council to be currently named Armagh City and Bann: we say that because we believe that Newtonhamilton, the town and surrounding area, have more affinity and more in common with Armagh City and other neighbouring towns like Keady, which are already in the Armagh district. We believe that both in retail, trading, social, educational and sporting contexts, Newtonhamilton has a closer affinity to Armagh and Armagh city particularly. We would then ask that it leave the Newry City and Down District and be moved into Armagh City and Bann.

**Assistant
Commissioner**

If Newtonhamilton were taken out, you have heard the evidence given by Professor Benoit earlier. That would mean then in fact that Armagh would be totally underrepresented. And certainly would it not take from the case made by Professor Benoit for 45 Councillors for Newry?

**Danny
Kennedy**

Well, we are aware that at this presentation there may well be others who will offer a reduction in terms of other wards currently envisaged to be in Newry City and Down. I suppose our difficulty is that our presentation to you has to be made in another place in terms of Armagh City. We think there is a minor impact or change as presently constituted, but when it is completely configured we think that it will ebb and flow.

Our understanding is that others, either individuals or parties, may make presentation to you sir that would involve the

transfer of the Rathfriland ward out and we would then replace that with the Newtonhamilton ward which would effectively localise any change.

Assistant Commissioner Councillor that is fine. I am sure you have lots to do today.

Danny Kennedy Yes I have. Thank you very much indeed.

Assistant Commissioner Good Morning Mr Morgan.

Ewan Morgan I am making a personal submission, Mr O'Reilly. My name is Ewan Morgan, I am from Newry. I sit on the Strategic Tier of the Newry Community Safety Partnership as the Community Representative for Newry City. I am also the Chair of the sub-group which is the Newry CRAG, which is the Crime Reduction Action Group, which is part of the Community Safety Partnership. I am also Vice-Chair of my local Community Association which is the Barcroft Park Community Association. I would like to make two short comments on the proposed ward name changes and also the proposed removal of the Dublin Road and Drumalane areas from Newry. In respect of the name changes, I believe that this review of boundaries was an opportune time to correct the anomalies of some of the mis-named Newry wards which happened over 30 years ago. In fact, we fought a successful campaign as community activists over two years ago to identify the traditional name of Ballybot and assert it as the proper title of that historic area. That is one of the four wards now which are recommended. Can I just say Mr O'Reilly that I am supported here today by representatives from Carrivemaclone, The Meadow, Armagh Road, Damolly and Drumalane Community Associations.

Assistant Commissioner I do have various written representations from various persons in those areas.

Ewan Morgan Yes.

Assistant Commissioner Would you be involved in those written representations? These would be Glenveagh, Dunreagh, Damolly, Edencrieve.

Ewan Morgan That is correct. Can I just state why that is maybe lacking in qualifications. I do feel that we have an endorsement here

from the community and many citizens within our proud city. I want to state on behalf of the many citizens who contacted the Commission, that the proposed removal of the Dublin Road and the Quayside Close, Drumalane housing estates is a contradiction in terms, if referring to Newry as a city, because you are essentially cutting off these areas from the natural urban hinterland in placing them in a rural environment with councillors who would be representing them who would reflect rural values.

I am aware, Mr O'Reilly, that there will be a presentation tomorrow from MLA Mickey Brady, which will identify boundaries which will keep Newry as one metropolitan urban area, rather than having different parts of it spread in towards rural South Armagh and rural South Down.

This concludes my submission Mr O'Reilly and I would like to finish by thanking you for allowing me the opportunity to discuss these two aspects of the Commissioner's Provisional Recommendations.

Assistant Commissioner Thank you Mr Morgan. Could I ask you a couple of things?

Ewan Morgan Yes.

Assistant Commissioner You may or may not be aware that the Commissioner has not given any statutory direction or guidance in relation to the names of wards at all. So when a ward has been named, he actually names the ward without any assistance from the legislation.

In relation to these various wards, other than these written representations which I have got and which I understand you have been speaking really on behalf of yourself and to some extent them. Have you actually put in proposals to help and assist the Commissioner in relation to names that you think are appropriate? Other than what is in these written submissions?

Ewan Morgan I am unaware of any other level of engagement on that, Mr O'Reilly.

Assistant Commissioner I think we already know the Commissioner is dependent upon guidance from electors. So you will associate yourself with what is in these representations?

Ewan Morgan Yes.

- Assistant Commissioner** And the essence of your second point is in fact that you effectively believe that by virtue of the outer reaches of Newry being coupled with rural areas, they may be not represented properly because of the conflict between rural and urban in any ward?
- Ewan Morgan** Yes. Speaking as a lay person looking at the proposed changes, it looks to me almost as if Newry is actually being made smaller as opposed to being made larger. And, again, speaking as a lay person, to me the term city reflects a large urban area as opposed to maybe condensing a smaller area. The two housing estates I mentioned which are large urban areas in Newry, the Drumalane and Quayside Close and the Dublin Road area, I believe are large urban areas with, again, the natural hinterland being the urban area of Newry.
- Assistant Commissioner** Are they relatively new housing developments?
- Ewan Morgan** No. The Drumalane housing estate is more than 50 years old, and has always been part of Newry City, or Newry town prior to the renaming. Parts of the upper end of the Dublin Road have were not part of Newry in the past, but they are now urban developments. Essentially what the new proposals are is that the entire Dublin Road area is taken out of Newry City.
- Assistant Commissioner** What about Ashton Heights?
- Ewan Morgan** Ashton Heights at the moment is not in Newry.
- Assistant Commissioner** Yes but what is it?
- Ewan Morgan** Those areas around the Chancer Road would be relatively new developments in the last 20 years.
- Assistant Commissioner** Glenveagh? Dunbreagh?
- Ewan Morgan** They are all in and around the same 10 - 20 years period.

- Assistant Commissioner** What about Damolly. How do you feel about Damolly?
- Ewan Morgan** Well, the anomaly here really seems to be that there is a proposed new ward for Newry called Damolly and the irony of it is that the area of Damolly in fact will not be in Damolly. So I think that more or less speaks for itself.
- Assistant Commissioner** There are proposals here for that very reason to call it, Derrybeg Park Ward, Drumgalion Ward, St Bridget's Ward – do any of those strike the right note with you?
- Ewan Morgan** Well, with myself absolutely yes, but I mean that is not for me to say.
- Assistant Commissioner** I would be interested in anything you have to say. Any of those would be preferable to Damolly?
- Ewan Morgan** Well, I think the names you mentioned, Mr O'Reilly, actually would reflect local historical and cultural aspects. I think St Bridget's actually referred to a religious aspect because there is a church in that area in the centre of it, called St Bridget's.
- Assistant Commissioner** What about Windsor Hill?
- Ewan Morgan** There is a presently a ward in Newry called Windsor Hill which would be one of the four wards proposed and would encompass Damolly as it exists now and other areas.
- Assistant Commissioner** Damolly is gone then, if you go down those other routes?
- Ewan Morgan** Damolly is essentially a ward which it is not part of. If you do not mind me coming back to when I referred back to 30 years ago, because the area I live in is the historic Ballybot area of Newry, with its own culture. There was an area called Ballybot, the area that Damolly has now incorporated, and the area where we live in Ballybot was actually called Daisy Hill which was named essentially after the hospital.
- Assistant Commissioner** Mr Morgan, that was very helpful, thank you very much.
- Ewan Morgan** Thank you very much.

[Comment from the floor – inaudible]

Assistant

Commissioner

The only comment I can pass on what you have said there Councillor is that I did say in my opening remarks if you were here for them, that this was a 'play it by ear' situation and certainly if the representations were going to run into tomorrow it was certainly running into tomorrow. But that is something that can really only be judged this morning.

[Comment from the floor – inaudible]

Assistant

Commissioner

Is there some way I can facilitate you now Councillor?

Unknown

Chairman can I just say something on that? I was one of the ones who rang up the Commission and we were told we had to come today and to register. So I think it is unfair if a person is going to be allowed to make representations tomorrow and he has not come here today to register, he is getting an unfair advantage and I object to that.

Assistant

Commissioner

My understanding of the situation is this person has been here and registered. My view was this morning when I saw the people who were here, that it was certainly going to run for two days and I do not have any difficulty in that regard Councillor. If I can facilitate you just tell me when. If you want to leave now and come back tomorrow, if that is what you are saying, I do not have a difficulty with that Councillor.

Unknown

I have made my point. It should be the same rule for everybody, that is the point and it has not been.

Assistant

Commissioner

Councillor, I have noted what you have said. The next on my list is Mrs Una Vallely.

Una Vallely

My name is Una Vallely, I am a resident of the Dublin Road in Newry and have been for 35 years. I live in a house that is over 100 years old and has always been deemed as part of Newry.

I have been listening to very learned speeches about percentages and all sorts of things. I am just an ordinary person who lives in Newry and was absolutely amazed when I saw the boundaries to discover that it is proposed that my urban home will be moved into a rural ward.

I live in the Dublin Road, I live in Drumalane. Drumalane is the council ward; it is also the name of the church that I go to.

That is the name that gives me my identity. I have a lot of names. My given name, the name of my home, the name of the street that I live in, they are all part of my identity. Drumalane is part of that, but Drumalane is to go. I am now going to be in Fathom. I have no link with Fathom - it means nothing to me.

In actual fact, all I know about Fathom is that it is a nautical measure of depth. I am not a Luddite who is against change, but when that change is a step backwards, an attempt to turn back the clock, and make a part of a city into a rural area, I am against it. The very suggestion seems to me to be bizarre.

The successful development of the new City of Newry is dependant on creating and fostering a united vision and identity. But I am not in Newry anymore. Hiving off a chunk of the city's population and tying it up with rural areas such as Killion, would actively, in my opinion, militate against Newry's city status. To me this is perverse.

Councillors have different skills and strengths dependent on their base. They develop expertise to better qualify themselves to serve their constituents. No councillor could reasonably be expected to reflect the needs and the expectations of such a widely diverse electorate as would constitute the Fathom Ward. I have worries and concerns about this. I am concerned about the impact of rural facilities on an urban setting. I live on an extremely dangerous road: what are the impacts for road safety if I am to be subsumed into our rural setting? What is the impact on road cleansing, on refuse and recycling provision? Are these things going to be affected? I do not know, they worry me.

Could I ask that the drawing of the ward boundaries be revisited? These boundaries should reflect the City status of Newry - the same way as the boundaries in Belfast, Lisburn, Armagh and Derry do. Newry should be allowed to be a whole, a unit and not have a line drawn right down through the 30 mph limit to cut off a chunk to put it into a rural ward.

My question is why has this been done? It defies logic. The boundaries should reflect the aspirations of the citizens of Newry. It is past the time when we accept anything less.

**Assistant
Commissioner**

Thank you, Mrs Vallely. Again just if I could just summarise to try to relate them back to the law which I am required to interpret. There are really effectively two big issues in the name: the

name of the ward, and you have heard me say that there is not any statutory direction or guidance given. Have you put any proposals about a different name?

Una Vallely No, I have not. All I know is that I was Drumalane and now Fathom.

Assistant Commissioner And the second element of your submission is in fact that you consider, for a variety of reasons, that in fact it is not possible for one representative to represent the conflicting interests within the new Fathom area of which you are proposed to be a part. Is that a fair summary?

Una Vallely That is my feeling yes. Yes, absolutely. Thank you.

Assistant Commissioner Thank you. Margaret Hoben. Good morning.

Margaret Hoben Good morning, my name is Margaret Hoben and I am here as an individual who is concerned with the rates. I am also here because it is the only opportunity that any of us have to actually speak and get answers from the Commissioner, so I am asking you to persuade him not to accept the biased Boundaries Order 2006 and the biased Act of Parliament which is going to go through dividing Northern Ireland into eleven district councils.

I am not against them going into eleven district councils, but because the reasons for the actual combination of the different councils are not satisfactory to me. We discovered that 75% of the people of the responses to the Review of Public Administration stated that they wanted 11 councils. But the word responses of those who responded to the questions - it means 11%. If you look at the pie chart in the Review of Public Administration, it states that of the 1,032 people who responded to the questionnaire question, 'how many councils do you want to have in Northern Ireland' and it said '43% of those 1,032 people said they didn't know'. The reason they said they did not know was because they were not given any information on what was going to happen. It was an attitude survey really, and attitudes can be changed as soon as you go out the door.

You can come in here with a certain attitude and then go out the door and meet somebody who persuades you about

something else. If something else is better informed and you can come back in here again and just as you will go away from this public enquiry with a different attitude than you came in with after hearing all the presentations.

They could not make an informed decision on something that they knew nothing about. So this has been used all the time, when they were talking about the seven councils, when they were talking about the explanation on the Boundaries Order 2006, they said 63% wanted seven councils. They did not. Eleven per cent of those respondents wanted 11 councils, so 10% of 1,032 would be 103 respondents said they wanted 11 councils out of a total electorate in Northern Ireland of 1,126,222 people.

**Assistant
Commissioner** Okay, can I just say to you this time, Mrs Hoben ...?

**Margaret
Hoben** I am speaking too quickly.

**Assistant
Commissioner** Everything you say I may or may not have sympathy for. I have let you speak on, but I did set out quite clearly that I have absolutely no control over the number of district councils, or how it was formulated or anything else. That is not within my terms of reference.

**Margaret
Hoben** Well what is in your terms of reference then?

**Assistant
Commissioner** We will go to this paper which I have not seen this morning.

**Margaret
Hoben** Local district council wards are the building blocks of Parliamentary and Assembly constituencies and the importance of retaining existing local district wards with names that can be easily identified by the Boundary Commission for Northern Ireland as well as the local population cannot be underestimated.

A recent quote shows how local district council boundary and ward changes affect more than the district councils concerned. A quote from the Boundary Commission says 'the Commission are to consider an interim review of constituencies once any restructuring of local government has been finalised. Until then the Commission Office has been temporarily closed

to the public'. In other words they cannot go on with their job until the local district council wards have been sorted out. The reason is, if you look at the Armagh Newry constituency, it says the complete districts of Armagh are going to be added in with 17 Newry wards. That is how they work out the average electorate for a constituency. They have to do it that way because the Parliamentary Constituency Act of 1985 states quite clearly how the average electorate in Northern Ireland can be found.

If you divide the average electorate this is the way they get a democratic electorate over the whole of the UK. It does not give priority to Belfast; the Parliamentary Constituencies Act does not give priority to any city in the UK other than London. This says how important local district council wards are to the formation of who in Northern Ireland will be the next representative in Westminster in the Assembly as well as in local district council areas.

The Boundaries Commission have to use the Electoral Register, which in itself is based on ward levels and names. I cannot understand the formula used by the Commissioner. If you look at Fermanagh, we are equal to Fermanagh in a sense, that we should be having the same formula used for us as he used in Fermanagh. Namely, he took the list of councils down and he kept them exactly as they were, exact names were held and he just said I am giving Fermanagh and Omagh 40 councillors, full stop. He has made no alterations, he has taken out one ward called Devonish, which it was a very small ward anyway. We have a situation now where we have 22 wards in Newry and Mourne in the new district council, and we have 22 wards in the Fermanagh part of the Fermanagh, Omagh District Council, which is only two thirds of our electorate. They have an electorate of 42,000 when we have an electorate of over 60,000 - nearly 61,500 - and they have exactly the same number of wards and exactly the same representation and councillors. Now to me in my book, there is no justification for that.

That is just going on the importance of wards and ward representation by councillors. They have not even lost a name and that to me is total discrimination against every other area in Northern Ireland, because he has not done that for anyone else.

As well as using local district council ward statistics for Parliamentary and Assembly elections, ward statistics are needed by Health and Social Services to allocate funding. The

Department of Economic Development for their draft new targeting social need action plan, mentions Silverbridge ward and Tullyhappy ward which are in the existing Newry and Mourne Council, but not in the Newry City and Down District Council. They have been selected for special attention by the Department of Economic Development in their targeting of social need plans.

Yet they are not there anymore, so where does the money go, or how do they target them?

Housing, education, the census, the electoral register itself are used by the Boundaries Commissioner and most of the forward planning departments in Northern Ireland use statistics based on local district council wards. To alter these wards statistics will render most of the research which has been carried out in the last 10 years, worthless.

My main gripe is to do with the combination of the eleven district councils. The division of eleven councils in the combination as outlined in the Boundaries Order has many disadvantages for the population of Newry and Mourne. It will cause a large increase in the regional domestic rate from minus 1.4% to plus 8.18% when Newry and Mourne District Council joins with the Down District Council, in the new Newry City and Down Council.

This is because at present the population of Down District Council contributes nearly 10% to the regional domestic rates. This rates increase will happen at a time when domestic water rates will also have to be paid separately for the first time.

The population of one ward from Banbridge District council, Ballyward, has been given over to Newry's allocation of 40, reducing the allocation in Newry to 39. Would it have been better off financially if they had been given the opportunity to stay in the Craigavon, Armagh City and Banbridge District Council as the Boundaries Order stated?

These three existing councils of Craigavon, Armagh and Banbridge will still have a very low percentage contribution to the regional rates, at minus 15.78%, even though most of the regional administrative services like rates, housing, water, planning, and about 10 other services, have been transferred from Newry and Mourne and other district council areas to Craigavon. Despite the fact that we are going to pay up on 8% of the regional rate, they are getting all the services and this is not going to redress the balance.

The idea of the Review of Public Administration, I thought, was a more even distribution of the rates.

**Assistant
Commissioner**

I am letting you read through this but again you know ...

**Margaret
Hoben**

I think the Boundaries Commissioner has to look at this on population. There is a difference between a District Electoral Commissioner and the Boundaries Commissioner. The Boundaries Commissioner has to look at how it affects the population and this is how it affects the population financially.

The Boundaries Order, which he is working under, says 'The District Electoral Commissioner is the one who sorts boundaries out'. He sorts districts out. But the Boundaries Commissioner has to look at how it affects the population and my point is it is going to affect very badly, financially everybody in the whole of Northern Ireland, but some to a greater extent than the other.

**Assistant
Commissioner**

You would seek to bring the financial implications into the argument on the basis that it affects population. I have taken that on board.

**Margaret
Hoben**

There has been a report on the redistribution of Government jobs from Belfast. It was investigated using existing employment figures in local district councils. Another financial burden on all of the 26 councils will be the redundancy and retirement packages which will have to be paid out to staff and workers who will lose their jobs when 26 councils are reduced to 11 councils. Again, that is the financial thing, and that is what he has to look at. There are going to be unemployed on the unemployed register.

The Boundaries Order was passed without any equality impact assessment on the serious implications for employment prospects on the population in 2011 in the remaining local district councils who will have no council headquarters of their own.

Every council depends on the general grant to alleviate the rates burden on its citizens and Newry and Mourne is no different. The general grant uses a formula based on the employment deprivation score obtained at local district

council ward level. When Newry and Mourne joins with Down, which has a fairly high employment level, then the district grant will decrease, adding even more cost to Newry and Mourne rate payers. Again, I would ask the Boundaries Commissioner not to recommend that 26 councils join together into the 11 councils as outlined in the Boundaries Act 2008 [sic]. I am saying they do not go into 11 councils, not as they are in the order, until the financial implications which will be forced on the population by the mergers of councils are adequately addressed.

A cost benefit analysis should be carried out, even at this late stage, by the Department of the Environment to see if a different combination of the 26 councils into 11 district councils will bring more councils into a fairer contribution to the regional domestic rates than the 11b combinations of councils will accomplish.

**Assistant
Commissioner**

Thank you. Most interesting Mrs Hoben. Could I just make some points and see if you agree with them? You are concerned about the names of the wards. You are concerned about the number of the wards allocated to this council, and you are concerned about the financial implications for the people of Newry City and generally. You believe that that is properly linked in with the Commissioner's view, having regard to population. Is that a fair summary?

**Margaret
Hoben**

Yes.

**Assistant
Commissioner**

Thank you, it was most interesting.

**Margaret
Hoben**

I just wanted to add one little bit here. I was interested in the way you were questioning them what do you think he should have done.

Well, I think fairly he should have ignored the fact that he is to give Belfast 60, ignored the fact that he should have to stick to 40, but adding up the total together he is allowed to give a maximum of 515 wards to the whole of Northern Ireland. He is entitled to do that. He has been told he can give 45 to each council. If you divide the electorate of 1,126,222 by 515 you will get a fairly accurate indication of how many wards each of them should be having, you know, in the district, in an area.

There would not have been any need for him to put five of the wards from Castlereagh into Belfast, or five of the wards of Lisburn into Belfast and then still give Lisburn and Castlereagh 40 wards.

That is not fair allocation across Northern Ireland either. We cannot offload, and he should not have taken Banbridge into 40, the meagre 40 that was allocated to Newry and Down. Ballyward and its councillor were taken lock, stock and barrel into Newry and Down which means we have only got 39.

It is going to have serious implications when the Parliamentary electoral constituencies are going to be divided up here, because Newry and Mourne at the minute has 61,000, enough for a Parliamentary constituency all on its own. The names should not have been just thrown away and I ask for fair representation, fair treatment and employment legislation which gives fair access to all these things, and access to services. He should point out to the Department of the Environment, they have said they have not done an equality impact assessment on the Order, and he should be aware of this because all of the Departments under the Good Friday Agreement and under any fair legislation, we all have to have equal representation an average electorate in our wards taking in the whole of Northern Ireland.

**Assistant
Commissioner**

Thank you, very much indeed Mrs Hoben. I would propose to adjourn for lunch. Or if there is someone who would like me to sit on I am happy to do so to facilitate anyone if they think they can deal with it now, I don't have a difficulty.

[inaudible - not at microphone]

Then I am happy to facilitate you.

Paul Hoben

Paul Hoben here, just an ordinary elector with a personal deep interest in democracy.

**Assistant
Commissioner**

May I ask before you go on. Are you any relation to the previous speaker?

**Margaret
Hoben**

Yes.

Paul Hoben

That is my wife, but we have different views which is why we have different submissions.

The basic point that I want to make is about democratic principle and it comes back to this business about the number of wards across Northern Ireland. I have made a written submission so I am not going to repeat it. I will just highlight a couple of the headings please. A fundamental point I want to make is that a vote - this is a democratic principle - should be of equal value everywhere. That is, a councillor would need the same number of votes wherever he lives to get elected. That is not the case under your Commissioner's recommendations. You have a very unequal average ward electorate. Could I just ask a little question and it will probably shut me up quicker. Is the Commissioner bound by the rules in any way, by the rules binding the Parliamentary Commissioner?

**Assistant
Commissioner**

The answer to that is no. Can I say firstly he is your Commissioner as much as he is my Commissioner. This purely relates to local government.

Paul Hoben

Just taking local government, it should be the case that populations produce the number of wards. In this order, the 1986 Local Government Order, it is the other way round.

The Act stated that Belfast will have 60 wards and the others will have 40 each. And you are going to say you are bound by that Act aren't you? I will say that Acts can be amended. There is an Assembly there and the first thing they should do is amend that Act, because it is democratically unfair. It is starting with an unfair maths figure saying Belfast will have 60, the rest will have 40.

**Assistant
Commissioner**

I can only deal with the law as it is today.

Paul Hoben

Yes. I know that. But what the law says under the Local Government Boundaries Act is that the Commissioner must in determining, I am quoting 'in determining the numbers of wards within the district, you must take regard to population'.

The Commissioner did not take regard to population. He says it himself. He says he used the 08 Ward Electorates. Ward Electorates and population are not the same. They might be linked in some way, they are not the same. Why did he not use proper population statistics which I have quoted in my submission? That is a question I would like answered.

Finally, I want to come to what I regard as the most undemocratic part of the whole thing and that is under my submission C, which is about the number of wards in Belfast.

Belfast has 60 wards according to the decision, which is very puzzling and unfair. There is no link with population. If you take the ward electorates, Belfast has the highest average ward electorate of 3,173. Fermanagh has the lowest -1,860 - and the one I am coming to now is the second lowest is Lisburn and Castlereagh, which has an average ward electorate of 2,064. I am going to be rather controversial here I am afraid, but the present recommendations for Belfast have made Belfast a bigger geographical area than it was before. I want to be fair to Belfast, but it had 51 councillors before, linked to population and now it is not linked to population. Big chunks of Castlereagh and Lisburn were actually moved into the new Belfast geographical district.

I would like to know why that was. Belfast's new average ward electorate is the highest of all, 3,173 and Lisburn's - after they have moved half of Lisburn out and half of Castlereagh out - they are down to 2,064, so my question is, why did he not leave the Belfast area alone?

**Assistant
Commissioner**

I have enough difficulty looking after the Newry area, without talking about Belfast.

Paul Hoben

I am finishing now. I am going to have to quote from an Indopaedia [sic] figure which talks about the community make-up of different wards in Northern Ireland. It is based on the 2001 Census and it says that - I hate to use these terms - but it is in this table, Castlereagh and Lisburn, which are largely moved into the new Belfast area, are both Protestant majority councils.

That is controversial, but I have to ask a question, what is going to be the political result of the new geographical area? I have to conclude that those wards being added in to Belfast will change the political representation of Belfast and I am afraid I see that as a new gerrymander. Thank you very much.

**Assistant
Commissioner**

Thank you. Shall we rise for lunch now?

ENDS

Please scroll down for the afternoon session

Local Government Boundaries Commissioner for Northern Ireland

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Assistant

Commissioner

Good afternoon. This is the afternoon session of the public hearing in relation to the Provisional Recommendations of the Local Government Boundaries Commissioner in relation to the proposed new area of Newry City and Down District Council. I gather that Mr Brady is going to speak first.

Mickey Brady

My name is Mickey Brady and I am a Sinn Fein MLA for the Newry Armagh constituency and I would thank the Commissioner and indeed the Boundaries Commissioner's staff for the opportunity to address you. I will start off by saying that the issues I am going to address are already in the public domain because this is the front of today's Newry Reporter. It has been highlighted on the front page, so it is certainly of public interest and I have issued an invitation to the Commissioner's representative to attend a meeting which we will be holding in Newry. I am going to address the whole issue around Newry's urban metropolitan identity and I have been approached by numerous people from the business community, residents, community groups and stakeholders within the Newry area about the absolute need to retain this urban identity. Obviously, it becomes very much an area of common interest for all of the groups involved and I think one of the things that I would say in looking at other urban areas such as Belfast, Derry, Lisburn and Armagh is that they very much retain the urban core. Obviously Newry was designated with city status a few years back and from that point of view my argument certainly would be to retain the urban identity of Newry as a city. Looking at the proposals I would say any of the proposals we are putting forward are within the remit of the Boundary Commissioners. We have not actually gone outside those because that would be a pointless exercise. Looking at some of the wards, for instance, you have Derrybeg which is now going to be in the Damolly ward and really there is no historical connection or otherwise; both have very separate identities within the Newry area. You also have the Whitecross ward coming into the Armagh Road area, which is the Five Ways roundabout. Whitecross is a village in South Armagh which is a considerable distance from Five Ways. We want to retain an urban identity; there are urban issues which are obviously relevant to rural areas as well and vice versa but rural Councillors would deal in many cases with different types of issues and problems than urban Councillors would so in that sense it is retaining that identity. For instance, Drumalane housing estate under the proposals and Quayside Close would become part of a Fathom ward, which comes right down to

the beginning of the Dublin Road out of Newry. Fathom would be very much a recognised rural area.

Assistant

Commissioner

From a personal vantage, Mickey, nobody seems to want to end up in Fathom. Is somebody trying to tell me something here?

Mickey Brady

No! I think a lot of it is probably based on historical areas. Last year, when I did the campaign about the change of the Ballybot area to the Quays, the Quays is a shopping centre which was built about 10 or 12 years ago. Ballybot is an area that first came to prominence in Newry in 1567. As somebody who was born right in the middle of Ballybot, there was a real identity there and there continues to be. The last map is really designating what we would consider to be the Newry urban area.

Now I have to say the Commissioner did not draw that particular line but it gives you a kind of flavour of the urban area that we are talking about.

Assistant

Commissioner

You would regard the final map on your written documentation as being what you would consider to be Newry City?

Mickey Brady

Exactly. There have been letters from residents; I handed some in myself to the Boundaries Commissioner's Office in Purdy's Lane and I know others have been posted and sent in, so we are talking about quite a considerable amount of letters proportionately to the population.

Assistant

Commissioner

Could I try just, if I went through here just to identify so that I can relate those back. Would they be generally in relation to Ashton Heights, Glen Bay, Dunbrae, Damolly? So what you are talking about, your presentation at the moment you would associate with the ...

Mickey Brady

Yes, all of those areas are within the Newry urban area but some of the proposed ward names would not include areas that people would see to have particular historical significance within the context of the Newry urban area.

Assistant

Commissioner

So I should be reading the many representations from people in those various areas?

Mickey Brady Yes, in conjunction with the papers that have been handed over in terms of the particular areas within the urban and metropolitan area of Newry.

Assistant Commissioner Do those representations also relate to the names of wards?

Mickey Brady Yes there are wards, yes.

Assistant Commissioner Are you going to deal with that or is that a different issue for you?

Mickey Brady It is an inclusive issue in a sense because within the context of the Newry urban area, a lot of the letters would deal specifically with particularly changes in ward names. In that sense the two are inter-related because we have looked at the Dublin Road area of Newry. It does not go outside the remit of the Commissioner or the boundaries; some of them are natural and some are manmade, for instance the railway, or the new A1, while maintaining the context of what the Commissioner is about. There are ward changes: for instance, the Derrybeg area, which is again an old historical area of Newry, would be taken into a Damolly ward which has no inter-relation. Damolly itself, the village of Damolly and the area of Damolly, would then be into Windsor Hill which is again an anomaly.

Assistant Commissioner The Commissioner is given no statutory direction or guidance in relation to the names of wards and what I think some representatives this morning have done is put forward some alternative names that they think more appropriate.

Mickey Brady Like Lisdrum and Drumliscagh. Again, most of them would be areas of historical designation. I think that certainly happened going back to the previous designations because, for instance, Ballybot went into Derrybeg and Derrybeg went into Ballybot, so obviously if you do not know the area then there are inherent difficulties there. I do understand the position the Commissioner is coming from, because unless you know an area fairly well, it would be ridiculous to assume that he knows all of the six counties intimately and townlands and names like that. It would be absurd to suggest that he might. What we are trying to do is put a case which would encompass a name change, but also those changes would be within the context of the Newry urban/metropolitan area.

Assistant

Commissioner Is effectively what you are saying that the Commissioner shall have regard to the desirability of this proper representation between the rural and urban ...?

Mickey Brady Yes, there is a need to make a clear differentiation between urban and rural communities under the Review of Public Administration and the new eleven council system which will be implemented in 2011. Obviously, the whole idea of this forum is to discuss the Provisional Recommendations and there should be a much more clear-cut differentiation between rural communities and the Newry urban area.

Assistant

Commissioner I will try to take it a step further just to clarify it - what I think you are suggesting is in fact the Provisional Recommendations, certainly in respect of the one area, but Newry generally, that in fact you feel that there is not a proper representation of those two competing type electorates within Newry City.

Mickey Brady Yes, and obviously in terms of Newry City now there are clear distinctions in terms of the designation between the rural and the urban area. There have been huge changes in Newry, most of which I have to say in my experience have taken place within the urban area. There are areas of Newry now when I was growing up which would have been considered out in the country, but are certainly now very much part of the urban conurbation.

Assistant

Commissioner What I am interpreting you to say is, in fact, that there has been no regard to proper representation in that new scenario: what were formerly city areas are not represented within a ward.

Mickey Brady Yes, and if you look at the maps included, for instance, for Derry, for Belfast, for Lisburn and Armagh particularly, the core urban identity has been retained and maintained whereas in Newry you would probably best describe it as a biscuit that has been nibbled around the edges. Maybe that is not a particularly good analogy but, you know, that seems to have been what has happened. You had the core shape but there have been bits taken off around the edges.

Assistant

Commissioner Is that not what happens when a City grows and it does not grow uniformly, it is the very nature of it?

Mickey Brady No, I am not suggesting it did grow uniformly but what I am saying is that there is a clear urban/metropolitan identity and that is not being taken into account in the Provisional Recommendations. Some of the wards, for instance, Whitecross coming in to Newry. Quayside Close is part of Newry, it is not part of Fathom and yet the Fathom ward will come right down as far as Drumalane church which is right at the bottom of the Dublin Road. Some of the areas we have quoted, there is the cut-off point in the Dublin Road which is the railway bridge. I think Clough roundabout, most people would accept that that is a natural and a logical cut off point between urban and rural.

Assistant Commissioner There are the other constraints which you know about, there are about five competing dicta and how would you solve the problem that you see in Newry, of some of the outer parts of the present Newry City being placed into other wards that you do not feel are properly Newry City? How do you get round that and still comply with the very strict statutory guidelines that are given?

Mickey Brady This is interesting because Newry and Mourne Council, as you may or may not know, have actually had a study done by somebody from Trinity in relation to the proposals and in relation to the 10% variation, in terms of the uniformity of numbers of the electorate. And presumably that is something that has to be worked out. Obviously we have included in the presentation the figures which I am not going to go through now. You have the opportunity to look at those but it is an area of common interest that we are talking about for all aspects of the community; the business community; the community groups; the residents; the public representatives; the Council and so on and it is really to maintain and retain the urban identity of Newry.

Assistant Commissioner I was just trying to focus on that point, that in fact the Professor dealt with numbers and he dealt with figures, but you are the man on the ground as to where these areas were. At the moment I would classify them as being on the outskirts of the present Newry and they are now being incorporated with areas with which you are uncomfortable. There is still a requirement to come up with those numbers.

Mickey Brady That may be something that in terms of the electoral districts - I think there are approximately five wards and that may be extended. We do not know at this point in time because

obviously that is for another decision-maker. I mean I think all of that would have to be factored in, in coming to any sort of rational conclusion. The presentation that I am doing is to do with that urban identity of the area of common interest and the terms of the economic position of the City status or the metropolitan area.

Assistant

Commissioner Well that is very helpful, Mr Brady, thank you very much. We have two members of Land and Property Services here and they are particularly involved in maps and names and boundaries of the wards. Before you leave, if you have thoughts that you could translate to them, then they will certainly pass them on to me and it would mean that any points that I have missed out on in relation to the names and numbers they will immediately pick up on, if that would be helpful.

Mickey Brady Yes that is fine, thanks very much.

Assistant

Commissioner Thanks. Mr Bradley?

P J Bradley Good afternoon. I am known throughout South Down as PJ, PJ Bradley. I am an SDLP Assembly Member for the South Down constituency. I am no longer a Councillor; any evidence I give or presentation I make is purely based on my local knowledge. I was 24 years a Councillor in Newry and Mourne. I have made a written submission and it is more or less to just add a little to the written submission I have made. There is one point I want to raise that I did not include in the written submission.

I was listening to Assembly Member Brady's comments on wanting to protect the urban identity in Newry, and I will start off with wanting to protect the rural identity of one ward, Derryleckagh. I would never want to see Derryleckagh included with the city of Newry because it is a rural, purely rural identity. It is lake and bog and the woodlands of the ASSI (Area of Special Scientific Interest) and the people are small rural community, you know.

Assistant

Commissioner Yes, can I just ask you, so the Derryleckagh branch representation is not part of your brief?

P J Bradley No I am only here today on my own as the MLA or local representative. I am not representing the Derryleckagh branch today.

**Assistant
Commissioner
P J Bradley**

No, although there is repetition in both. It was just to retain the rural identity of Derryleckagh, I think it is very important for the future, whoever will be making the decision for the lake, the bog, which is an Area for Special Scientific Interest and the wood, Derryleckagh wood. Something that I did not comment on in my written submission was the Narrow Water or the Burren ward. I have just noticed from this map here that the dividing line comes along a road called the Mound Road and it joins to the Narrow Water roundabout.

When you approach the roundabout according to the drawing on the map, you turn right on the roundabout. I would like to add a little line to turn left so that Narrow Water roundabout would remain in Burren ward with Narrow Water Castle and the Narrow Water Desmenes. There's the old Elizabethan keep at Narrow Water and Narrow Water castle and the Narrow Water estate. It is only a technical point and there are no numbers involved in the population, as there are only two people living in the castle in the area, so I am not playing around with numbers here.

**Assistant
Commissioner**

What I am going to ask you to do in relation to that is if you identify it clearly to the two Land and Property Services guys, so they can actually bring that to my attention.

P J Bradley

I will do, yes. Regarding Rostrevor ward, which I do welcome here, previously the ward was Burren/Kilbroney which was divided. It was a bad decision at the time but we just had to live with it. Again, it was number crunching but Burren/Kilbroney ward was divided by a hill or a mountain called Slieve Roosley with no infrastructure and no roads between the two parts. You had to drive from Kilbroney to go through the Rostrevor ward to get into the Burren part of Burren/Kilbroney, so I welcome that change because it caused a lot of confusion both at polling stations and with voters. You know they will go down into Rostrevor to vote but they are voting for a different ward and I am glad that that has been resolved or it appears to have been resolved.

I have only one final comment which is probably very dear to me being a County Down man. It is the proposed name change or the proposal for Newry City and Down. I was a bit

surprised when I read that the Mourne were left out, or the mountains of Mourne.

Assistant

Commissioner

Incredibly, you are the first person who has brought that up today, PJ, would you be surprised?

P J Bradley

Yes, well this is the most common mountain range in Ireland. There is no better known place and I have been in tourist promotion events for the Council for 24 years. We have been to America, we have been to Canada, to Europe, to Britain, to Ireland, and the mountains of Mourne are the easiest thing to sell. It is a European range of mountains and you only have to look out for them to see that they are an asset. If I were in private business that is the first thing I would to identify - something to do with the Mourne. We have hotels and newspapers and everything called after the Mourne, it is one of the two kingdoms in Ireland. I know Percy French has made it famous alright.

Assistant

Commissioner

Can I ask you just arising out of that, arising out of and your representation, do you, is it the Mourne that you're talking about now or is it Mourne?

P J Bradley

Would it be the mountains of Mourne which is abbreviated by the Mourne and Mourne - you know it can be anything. The mountains of Mourne are distinctly the mountains. We think of the mountains when we talk about the Mourne and then Mourne would take in the flat lands and all down by Cranfield and Kilkeel.

Assistant

Commissioner

So just to clarify for me then, the Mourne is all the area of the Mourne. If the boundary as provisionally recommended by the Local Government Boundaries Commissioner is agreed, will all the area of the Mourne be included now within what would be this new district?

P J Bradley

Oh yes, it would be.

Assistant

Commissioner

Why was it then Mourne? As we are talking today it still is.

P J Bradley

Yes. The history, if I remember it in 1973, it was given the name Mourne. It took over from the old Council covering Kilkeel and Rostrevor. Kilkeel represented the Mourne, both the high Mourne and the low lands - the flat lands.

Assistant Commissioner The point I was trying to establish in my mind is why they would have restricted your present title of your Council to Mourne?

P J Bradley I do not know if there was any challenge made to that at the time. I suppose locally we have no difficulty in Mourne, the Mourne mountains, Mourne – they are all just the one, we would look at them as the one.

Assistant Commissioner Yes, but in your remarks you did not mention the Mourne once, you used the plural the Mournes.

P J Bradley Yes, well there is Mourne, the Mournes and the Mourne mountains but I do not see any difference in them.

Assistant Commissioner You do not have a difficulty with this one as long as Mourne is in some shape or form.

P J Bradley Some reference to Mourne. It is a very difficult one to find a name for. When you have been from Downpatrick to South Armagh it is very difficult to come up with a name that's going to suit all.

Assistant Commissioner The Commissioner has not been given any statutory directions or guidelines, you know, in relation to the name that he recommends.

P J Bradley Well I would only hope that he would reconsider, you know, and include it somewhere. I did make suggestions of Newry City and Mourne or Newry City and the Mournes.

Assistant Commissioner If you think of people in Down would be comfortable with it.

P J Bradley Well this is it, you know the people of South Armagh will not be happy with it but it is not one you are ever going to come up with any more than 60% of support for, no matter what name you come up with.

Assistant Commissioner You do not really care as long as the Mournes are included.

P J Bradley I am thinking of the future generation of the people that will go out to sell and market the area. It is the greatest asset we have and they are known worldwide.

Assistant Commissioner Thank you very much indeed.

P J Bradley Thank you.

Michael Coogan My name's Michael Coogan, I'm a Down and District Councillor for Ballynahinch.

Assistant Commissioner Presumably you do not want to be associated with PJ Bradley's comments on the names of the Council there.

Michael Coogan I knew it, Newry and Mourne Council just retain its name - no I do not think I will be doing that one. I think PJ touched on it and it is going to be difficult to find a name that is going to satisfy everybody stretching right down. Ballynahinch would see itself as being the gateway to the Mournes for a number of reasons but no, really, the only points I would wish to make are that there has been speculation outside that people would be lobbying for some parts of the district not to be taken out, i.e. Ballynahinch to be removed towards Lisburn, and I would caution against that. I am in agreement with the map in terms of Ballynahinch and the whole of Down district moving over *en bloc* and being retained within the new Council and so in a sense I am in agreement with the Commissioner's proposed district boundary. I am just looking at the maps and within the new neighbouring council Dromara and Ballynahinch is written halfway through. The beginning of Ballynahinch stretches from Dromara and I would not be opposed to Dromara being included within ...

Assistant Commissioner Sorry, you do not mind something coming in, it is taking anything out of it.

Michael Coogan This is a personal viewpoint from myself as a Councillor, there were two areas that I thought it may be sensible to include within our boundary and that was Rathfriland, given its close proximity to Hilltown, and even Ballyward and Dromara. I think the Dromara aspect of it touches on one of the questions you had asked of the previous speaker - are the whole of the

Mournes included within this new council area? They are, but there would be a very close affiliation between some of the areas in Dromara, Finnis and the Mournes and Slieve Croob for example.

Assistant Commissioner Slieve Croob is included in the new district?

Michael Coogan Yes. but it is Finnis which is neighbouring to it which it is more or less the same area. It is the dividing line so in that sense I think that there is a natural affiliation between Dromara and Ballynahinch, that rural identity would be more in line with the neighbouring Ballyward and Ballynahinch area.

My main point would be that the district as a whole is retained. Just another point is that the Ballynahinch ward is one of the larger wards with, I think, it was a 4% plus deviation from the main. There would be a note of caution that Ballynahinch is also the fastest growing town in Down district so that could raise issues in the future – are we going to be oversubscribed in terms of electorate? It is already high.

Assistant Commissioner Yes but what you have here, it is the same issue that Newry has then, in eight years time in relation to the mix between your urban and rural populations.

Michael Coogan Yes.

Assistant Commissioner Is there not some inevitability about that?

Michael Coogan Well yes. Drumaness is under and Ballynahinch is over and the growth would be towards Ballynahinch East, where the bypass is going to come in. There could be an argument there that the old Ballynahinch East ward or part of it could balance up the books in Drumaness. Ballynahinch as a town, to be a single ward, is going to face those same urban problems. It is something else that I had noted in the joint response from Newry and Mourne and Down District Councils as they exist at the minute. They had referred to the fact that the ward should centre on the centres of population and they named a number of areas, i.e. Newcastle, Warrenpoint, Newry, Downpatrick and they neglected to include Ballynahinch which they should have included. During the discussions that took place, Ballynahinch was in there and I cannot change the

response now but I would add that it is one of the urban centres of population and the fastest growing.

Assistant

Commissioner

But at the moment under the statutory conditions that we have got to operate under, in general terms you would be happy with Ballynahinch just at this point in time?

Michael

Coogan

Yes. At this point the main focus of my presentation will be that I am in agreement with the boundaries as they sit.

Assistant

Commissioner

To summarise, you are satisfied with the Recommendations, you would be concerned if that had anything taken away, but if anything is going to be given, you would think consideration should logically and properly be given to the Dromara area and the Rathfriland area.

Michael

Coogan

Yes. And that if there were to be changes to the Ballynahinch ward, that a possible route for that would be to include part of that within Drumaness. I could go on in that I thought Ballyward geographically was a very large add-on to the district and stretches right almost into Ballynahinch town, and Drumaness ward could have continued over. Ballyward is not really among the higher populated wards, it is basically breaking even but again Drumaness is slightly under. It is minus four, so if you can see just that little outshot where Drumaness could continue over. But that is fine tuning really and I would not consider it a major issue.

Assistant

Commissioner

Thank you very much indeed Mr Coogan. Okay.

ENDS
