



**RESPONSE TO THE REVIEW OF NORTHERN IRELAND LOCAL
GOVERNMENT BOUNDARIES PROVISIONAL RECOMMENDATIONS
REPORT**

NOVEMBER 2008

Response by the Ulster Unionist Party to the Provisional Recommendations Report (September 2008) of the Local Government Boundary Commissioner for Northern Ireland

The Ulster Unionist Party welcomes this Review of Local Government Boundaries - the first since 1973 - and recognises that the changes being proposed will set the course for local Government in the Northern Ireland for a generation.

At the outset it must be reported that the Ulster Unionist Party in their response submission to the Review of Public Administration in Northern Ireland (Further Consultation) in September 2005 stated:-

'The Ulster Unionist Party supports option 3 – i.e. the fifteen councils model based on parliamentary boundaries (option 15A). We believe that the basic building blocks should be those developed independently by the Parliamentary Boundaries Commission, thus ensuring proportionality of electorate and citizens combined with a single representative structure that will enhance the accountability of all services. This model will also reduce the confusion on the part of the electorate and reduce conflicts of interests between MLA's and MP's in certain areas. Equally the Ulster Unionist Party supports the idea of co-terminosity of services either in discrete units or by the combination of units as appropriate.

In line with our stated position in respect of the creation of a 15 council model we again highlight our earlier comments that 'the proposed model appears to artificially smother Belfast as the capital city of Northern Ireland. As a party we believe Belfast should be allowed to expand naturally following natural boundaries set by its inhabitants. Therefore any model, which restricts Belfast to its current boundary, will be regarded as detrimental to the development of the city'.

In addition to our concerns regarding Belfast, we have a number of other concerns and believe that we have identified a fundamental flaw running through this Review, namely that in the drawing up of new wards, there is a complete lack of any legislative requirement on the Review to explicitly take account of local community identities.

The Powers of the Commissioner

It was clear from the debates in Stormont in April and May that there was a major difference of opinion between the Ulster Unionist Party and the DUP regarding the extent of the powers available to the Commissioner.

The Ulster Unionist Party sought to amend the Local Government Boundaries Bill to increase the powers of the Commissioner to enable him to take account of local community identities, as is the case in England, and to amend Section 1 Clause 2 of the Act so that the word “major” was removed and the clause should read “The 11 local government districts shall incorporate respectively, the whole or part [not **major** part] of the following former local government districts.”

This would obviously have given the Commissioner more flexibility.

However, in April, the then DUP Environment Minister, Arlene Foster MLA, stated that “The Local Government Boundaries Commissioner can make small **or larger** changes to boundaries.”

The then Minister also stated that “as the legislation stands, I do not accept that the commissioner will not have the ability to make meaningful change. The legislation provides the commissioner with that ability – it is certainly not a straitjacket.”

“The legislation allows the Local Government Boundaries Commissioner to consider the different areas and to decide which needs to be moved to other council areas.

“The last commissioner regarded “major” as a spatial term. That does not mean the new commissioner will regard it in the same way ... It will be up to the new commissioner to determine what “major” means when he or she considers areas.” (Assembly Hansard 29/04/08).

The Ulster Unionist Party did not accept this and sought to amend the Local Government Boundaries Bill to explicitly provide the Commissioner with greater flexibility, but this was opposed and subsequently defeated by the DUP and Sinn Fein.

It therefore came as no surprise to the Ulster Unionist Party when the Commissioner’s Provisional Recommendations Report (September 2008) stated in section 4:3 under the heading “General Approach” that “Section 1 (2) of the Act does not define the meaning of “the major part” in relation to existing local government districts. I took the view that this was essentially a spatial term rather than a reference to population or electorate.”

We are in no doubt that this, coupled with the lack of any direction to explicitly take account of local community identities, has un-necessarily restricted the Commissioner’s latitude in conducting this Review.

Local Community Identity

Legislation in Great Britain requires the Electoral Commission to take account of both electoral equality and local community identity. Or to be more precise, their website states “*when making our recommendations we also take into account community identity, convenient and effective local governance and the electoral cycle.*” This is only logical, as elected representatives represent the community of people who live in an area, rather than the area itself. We believe that the failure of the DUP and Sinn Fein to amend the Local Government (Boundaries) (Northern Ireland) Act 2008 to permit the Commissioner to take account of community identity and give the people of Northern Ireland the same rights and privileges as are afforded to their fellow citizens in Great Britain.

Even the legislation governing Parliamentary Boundary Reviews in Northern Ireland permits the Parliamentary Boundary Commission to take account of “any local ties”, a fact which the Local Government Boundaries Commissioner would be well aware of, being a member of the Parliamentary Boundary Commission for Northern Ireland at the time of his appointment in June 2006.

Indeed Page 13 of the Boundary Commission for Northern Ireland – Fifth Periodical Report on Parliamentary Constituencies (March 2008) stated that the Commissioner’s recommendations “*reflected concerns about the need to maintain a fair balance between the aim of achieving electoral equality by reducing disparity between the number of electors in each constituency and the requirement, where possible, to preserve long established ties.*”

We recognise that the Parliamentary Boundary Review was a separate review, but make no apology for referring to it. There is absolutely no doubt that in terms of the process, there is every justification for citing comments made by the Parliamentary Boundary Commission as part of this review, not least because the wards created by this review will form the building blocks to be used by the next review of Parliamentary Boundaries.

As stated earlier, it is a source of deep regret that, in spite of the best efforts of the Ulster Unionist Party in several debates at Stormont in April and May 2008, the DUP and Sinn Fein combined to ensure that local community identity was not something to which the Commissioner had to have regard.

We believe this to be a major mistake which means that the proposals run the risk of being regarded as fundamentally flawed, and what has been produced relates solely to a “numbers game.” We accept that the concept of electoral equality is vital, but are at a loss to understand why in Northern Ireland, the principal of electoral equality is not balanced against the need to reflect local communities and identities, as is the case in Great Britain.

This may explain some glaring flaws in terms of ward boundaries, such as the proposed wards of Whitespots in the proposed Ards & North Down District Council, Carnmoney Hill in the proposed Antrim & Newtownabbey area and the proposed wards of Hightown,

Collinbridge and Mallusk also in Antrim & Newtownabbey, which divide a compact urban area into three wards. We also have wards such as Conlig in the proposed Ards & North Down District Council and Lisnarick in the proposed Fermanagh & Omagh District Council, where the wards don't even contain the villages they are named after.

We consider that ward and constituency boundaries should be clearly identifiable and follow features such as roads, railway lines, or rivers. It would appear to us that in too many instances, out-dated boundaries have been retained which follow field boundaries, long since eradicated by urban development, creating ward boundaries which make no sense whatsoever to local communities. This is a great disappointment as there had been hopes that this Review would address anomalies in ward boundaries, and creates wards which reflect the situation on the ground in the early 21st Century, as it may be many years before we have the chance to amend them.

Some people may claim that this problem can be alleviated in the construction of the District Electoral Areas (DEAs), but we would prefer to see wards constructed with clearly identifiable boundaries which do not pre-empt any decisions regarding DEAs. If ward boundaries are unsatisfactory, we would have concerns that DEA boundaries will also be unsatisfactory.

Indeed in the debate at Stormont on 29 April, the then Environment Minister, Arlene Foster MLA stated that *“it is not the job of the Local Government Boundaries Commissioner to set the district electoral areas.”*

Belfast

With regard to Belfast – the Capital City of Northern Ireland – the Ulster Unionist party has a number of concerns.

As stated earlier, there is a fundamental flaw running through this Review in the drawing up of wards, and that flaw is the complete lack of any requirement on the Review to take account of local community identities. This is a particular issue with regard to the proposals for the Dundonald area.

A second major flaw – possibly a fatal one – is the fact that under the Provisional Recommendations the City of Belfast will still be constrained by outdated Victorian boundaries to the east and north, some of which date back to 1892. Once again, this issue is most obvious in the Dundonald area, which is to be linked with Lisburn, in an arrangement that can only be described as bizarre, and at worst as an attempt to gerrymander Belfast.

This is the only conclusion which we can reach in light of the fact that the Commissioner’s statement dated 17 September 2008 stated that he has recommended *“that the boundary of the Belfast Local Government District should reflect its natural setting as encompassed by the surrounding hills, a number of landscape features and some major roads.”*

Given this statement from the Commissioner, we are at a loss as to why he chose the boundary he did to the east of Belfast, where he did half a job and as a result left the urban Dundonald area as a “salient” and part of a geographically bizarre Lisburn Council arrangement. We will return to this issue later in our submission.

We obviously support the proposed transfer of Knocknagoney from North Down into Belfast as we believe this merely recognises the community identity of the people who live in that area and corrects an anomaly which has arisen due to out-dated boundaries being rendered obsolete by modern housing development.

Belfast and Dundonald

If one looks at a map of the proposed “Lisburn City & Castlereagh District Council” it is immediately apparent that the Dundonald area is an anomaly, out on a limb at the north-east of the proposed Council. There are absolutely no ties between Dundonald and Lisburn, and not even the semblance of a major transport link. Anyone wishing to travel between the two urban areas will have to travel into Belfast to do so. This fact alone highlights the absurdity of the proposals contained in the Provisional Recommendations.

It is curious that the Provisional Recommendations go half way to addressing the problems in the east, by recommending that the existing wards of Hillfoot, Lower Braniel, Upper Braniel, Gilnahirk and Tullycarnet be transferred into Belfast, thereby creating a more appropriate boundary in this part of the east, but it is inexplicable that the Dundonald area should be left out.

It is immediately obvious to anyone with even a basic knowledge of the Dundonald area, that it is an extension of east Belfast, comprised mainly of people who have migrated along the main arterial route of the Newtownards Road. They look to east Belfast for family ties, Church ties, shopping patterns, social and sporting links. They are east Belfast to the core and in no way whatsoever could they be said to look to Lisburn and no-one could retain any credibility by seeking to argue otherwise.

Page 7 of the Boundary Commission for Northern Ireland – Fifth Periodical Report on Parliamentary Constituencies (March 2008) spoke of proposals which were discarded because they “*posed substantial difficulties ... in particular with regard to inconvenience to electors and the significant disruption of local ties.*”

No better phrase could be deployed to describe the Local Government Boundaries Commissioner’s Provisional Recommendations for the Dundonald area.

The Ulster Unionist Party is therefore firmly of the opinion that the proposed wards of Dundonald, Carrowreagh, Graham’s Bridge, Enler, and the urban portion of Ballyhanwood should be incorporated into Belfast City Council. Indeed this proposal would merely reflect the proposal of the Boundary Commission for Northern Ireland – Fifth Periodical Report on Parliamentary Constituencies (March 2008) which proposed that these wards should form part of the East Belfast Parliamentary Constituency.

We are aware of a suggestion that there is a “green wedge” between the proposed eastern boundary of Belfast and the Dundonald area. This can only refer to the cemetery on the Upper Newtownards Road, and the golf course at Knock Golf Club. This argument is not sustainable for two reasons. Firstly, it is well known that there is a planning application to develop a significant portion of the Knock Golf Club for housing. Secondly, and even more importantly, if this short stretch of the Upper Newtownards Road is to be regarded as a “green wedge”, it is as nothing to the many miles of “green wedge” which exists between Dundonald and the nearest settlement of Moneyreagh –which in any case looks to Comber and Newtownards not Lisburn. Indeed. heading south from Dundonald, the

nearest settlement of any size is Carryduff, which is as far away from Dundonald as the furthest point in west Belfast.

Whilst we are unaware of the Commissioner's reasoning for including Dundonald in Lisburn and not with Belfast, we can say with some certainty that the reasoning does not include local community identity or geographical features. There is only one logical place for Dundonald to be placed, and it certainly isn't with Lisburn. We are willing to accompany the Assistant Commissioner on a visit to this area in order to let him or her see the situation for themselves.

Our proposals for Dundonald merely reflect what the Provisional Recommendations proposed in the south and west of the City, where the existing wards of Twinbrook, Kilwee, Poleglass, Collin Glen, Dunmurry and part of Seymour Hill are due to transfer into Belfast. For the most part the electors here would regard themselves as living in west Belfast and forming part of the wider west Belfast community, and the proposals tidy up the City boundary in this area. Once again, the bulk of these wards already form part of the West Belfast Parliamentary Constituency

We are merely asking that in the interests of equality of treatment, the same principle be followed in east Belfast by incorporating Dundonald into the wider east Belfast community. Any other course of action would, we believe, remove all credibility from the Review.

Belfast and Newtownabbey

We also believe that there should be a re-drawing of the northern boundary of Belfast city to better reflect the identities and interests of the people who live there.

While it is more difficult to identify a coherent boundary in this area than in either the west, south and east of the city, we believe that a coherent and easily identifiable boundary can be established based on the main dual-carriageway linking the M2 and the Shore Road at Whiteabbey. This would transfer the proposed wards of Valley, O'Neill, Rathcoole and Whitehouse to Belfast, and like our proposals in the south and east of the city, would better reflect the interests of the people in these wards, who we believe identify with Belfast.

Once again, our proposal would merely reflect the situation which already exists with regard to Parliamentary Boundaries in this part of the world. Indeed the Boundary Commission for Northern Ireland – Fifth Periodical Report on Parliamentary Constituencies (March 2008) page 14 – recommended that an even greater number of wards in the Glengormley area should form part of the North Belfast Parliamentary Constituency, on the grounds that “their transfer would recognize the movement of the electorate from Belfast into these wards and local ties and be broadly acceptable.”

Furthermore, the Ulster Unionist Party's original proposal under the Review of Public Administration was for 15 Councils, based on the Parliamentary boundaries, so we are being consistent in arguing for these four wards to form part of Belfast City Council.

Outdated Boundaries

In Page 58 of the Boundary Commission for Northern Ireland – Fifth Periodical Report on Parliamentary Constituencies (March 2008), the Assistant Commissioner stated; *“It is my view that the City boundary has clearly expanded by radial redistribution of its inhabitants who continue to hold a perception that they are, and remain ‘Belfast people’.”*

In an even more devastating critique he said *“I would consider it an unnecessary constraint to regard Belfast as being bound by historic designation of its local government boundary. Clearly the present LGD boundary is not recognised in terms of definition of the City nor its existing constituency boundaries.”*

He also pointed out that of the 75 wards currently comprising the four Belfast Parliamentary Constituencies, no fewer than 24 fall outside the existing boundaries of Belfast City Council. This is without considering the recommendation that the wards of Dundonald, Carrowreagh, Graham’s Bridge, Enler, and the urban portion of Ballyhanwood should be incorporated into the East Belfast Parliamentary Constituency.

The Ulster Unionist Party is therefore urging the Local Government Boundaries Commissioner to revisit the Belfast situation. In proposing that wards be transferred into east and west Belfast from Lisburn and Castlereagh, he has demonstrated that he is prepared to extend the city Council boundary. We are merely asking him to continue this course through to its logical conclusion.

His proposals will set the template for the city of Belfast for decades to come. It is imperative that he gets it right. At the end of his Review he must leave us with a Belfast City boundary which accurately reflects the Belfast which exists in the early 21st Century, and not a half-way house, hamstrung by political sensitivities and the boundary agreed by the City fathers in the Victorian era. The people of Belfast deserve better.

In addition to the above, we also propose a minor change to the boundary between the wards of Ballygomartin and Forth River so that it should run to the rear of the houses to include them in Ballygomartin ward.

In **Derry City & Strabane** - which we would rename the City of Londonderry & Strabane (or at the very least “Foyle”), as a name which could command cross-community support and recognise the city’s historic heritage. We would like to see a re-drawing of the boundaries in the south of Strabane town so that residential areas in Finn ward are included in the town.

We note that the West Tyrone Constituency Association and the Fermanagh Unionist Association wish to make suggestions relating to the configuration of Local Authorities in the west of the Province. These suggestions will be amplified at the relevant local hearings.

In **Fermanagh & Omagh District Council** we are aware of a great deal of local disquiet regarding the proposed Council, with many local people arguing for a Fermanagh & Dungannon configuration as per the Parliamentary Constituency, which they believe better reflects the identity of the local community. Local members will raise this issue at the public hearings in this area.

We are also concerned at the ward of Lisnarick which doesn’t actually include the village of Lisnarick.

As stated earlier, we note that the Fermanagh Unionist Association and the West Tyrone Constituency Association wish to make some other points relating to the configuration of Local Authorities in the west of the Province. These suggestions will be amplified at the relevant local hearings.

In **Mid-Ulster District Council** we propose a minor amendment to the boundary between the wards of Coalisland South and Killymeal so that the boundary should run along the Torrent River so as to unite the bulk of the town in one ward, namely Coalisland South.

We also have a suggestion regarding the names of the wards of Moneymore and Lissan. We appreciate that in such a rural area it is difficult to unite the urban area of Moneymore town in a single ward, so as an alternative we propose that the ward of Moneymore be re-named Moneymore East, and that Lissan ward be re-named Moneymore West to better reflect the situation on the ground.

As stated earlier, we note that the Fermanagh Unionist Association wishes to make some other points relating to the configuration of Local Authorities in the west of the Province. These suggestions will impact on the Mid-Ulster Council, and will be amplified at the relevant local hearings.

In **Armagh City & Bann** we would like to see some further consideration given to arrangements in the Markethill area, as Markethill is to be split between the wards of Hamiltonsbawn and Poyntz Pass. We propose that this be revised so that Markethill is united within one ward.

We also propose that the village of Killylea be transferred from Navan ward to Blackwater ward and that the new boundary run along the main road to the north of the village.

We also received a proposal from the Newry & Armagh Constituency Association of the Ulster Unionist Party also proposed that the boundary between the wards of Richill and Loughgall be re-drawn so that the area at the north west of Richill ward be transferred to Loughgall.

The Newry & Armagh Constituency Association also proposed that the ward of Newtownhamilton be transferred from Newry City & Down District Council into Armagh City & Bann on the grounds that the local community looks more to Armagh than to Newry for retail, commercial trading and social and sporting ties.

We note that the South Down Unionist Association wishes to make some other points relating to the configuration of Local Authorities in the south-east of the Province, and these suggestions will be articulated at the relevant local hearings.

In **Newry City & Down** we would recommend that consideration be given to re-drawing the wards in the Ballynahinch area so that this urban area is not divided un-necessarily between three wards. We have similar concerns regarding the division of Crossgar.

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We note that the South Down Unionist Association wishes to make some other points relating to the configuration of Local Authorities in the south-east of the Province, and these suggestions will be articulated at the relevant local hearings.

In **Lisburn City & Castlereagh** we have already identified a major problem with regard to the inclusion of the Dundonald area in this Council, as we strongly believe that the identities and interests of the people of Dundonald would be far better served by their

inclusion with the City of Belfast with whom they share numerous links, rather than by linking them with Lisburn, an arrangement which we can only describe as bizarre.

Even given that, we would like to see more easily identifiable boundaries being drawn up for the wards in the Dundonald area, which appear to be arbitrary to say the least. We believe that better boundaries can be established for the wards of Carrowreagh, Dundonald, Grahamsbridge and Enler, which should not involve the crossing of the main Upper Newtownards Road or the use of minor side-streets.

The Ulster Unionist Party strongly believes that no matter what proposals are adopted, Lisburn must retain its City status.

In **Antrim & Newtownabbey District Council** we would suggest that the wards of Ballyclare North and South could be more accurately named East and West.

It is in this area that we found some of the wards whose boundaries have given us greatest cause for concern.

Carnmoney Hill comprises disparate settlements which, to say the least, are not a natural fit to form a ward.

We are also mystified at the proposals for the Hightown area – also in the proposed Antrim & Newtownabbey District Council area – where a community is divided between three wards – Hightown, Collinbridge and Mallusk.

In both these localities we believe that the Commission has much work to do to create wards which would be better understood by local residents and representatives.

We have also received a suggestion that the new Council be named “The Six Mile Valley Council” after the feature which unifies the two areas, and would ask that this suggestion be considered.

We would also urge a complete re-assessment of the proposals for a number of wards in the proposed **Ards & North Down District Council**,

A major issue of concern relates to the issue of Electoral Equality. In the new Council the Ward Electoral Average is 2,557, and we are aware of local concerns that a disproportionate number of wards in the former North Down area are above the average, while a disproportionate number of wards in the former Ards area are below the average.

Certainly the nine Ards wards of Comber North, Comber South, Comber West, Cronstown, Island Hill, Killinchy, Portavogie, Portaferry and Regent are below the

average , whereas in the North Down area only the wards of Bloomfield and Conlig are below the average. This issue clearly needs to be re-visited as it is clear that under the current proposals, the people of North Down are being under-represented and the people of Ards over-represented. A complete re-warding exercise may be required.

We have also identified some of the proposed wards which we believe make little sense on the ground and bear no resemblance to or take any account of local communities.

This includes Whitespots, which comprises the village of Conlig – which is not even in the so-called “Conlig” ward – and a built up area to the north of Newtownards town.

The proposed Conlig ward would be better re-named Balloo to better reflect the area it covers.

Island Hill ward also seems a curious mix of an area on the fringe of Comber and the West Winds estate in Newtownards.

We also have concerns regarding Loughries ward which comprises a part of Newtownards town and a part of Millisle, and we are concerned that Carrowdore ward splits Millisle in two.

In the proposed **Causeway Coast District Council**, we would like to see a more coherent boundary to the south and east of Limavady town where a large part of the town seems to be rather arbitrarily in the rural wards of Drumsurn and Altahullion.

We are concerned that the boundary between Portstewart and Dundooan ward fails to take account of the huge amount of development and expansion which has taken place since the last review of electoral wards. Under the current proposals the town will be divided un-necessarily into three wards, when it could be accommodated by two.

Our main concern is that a large portion of the southern outskirts of the town in the vicinity of the Baptist Church, and along Agherton Road, will not be in either of the proposed wards of Portstewart or Atlantic, but will be in a huge rural ward called Dundooan.

We urge the Commissioner to seize the opportunity afforded buy this Review to ensure that the warding arrangements for Portstewart reflect the modern boundaries of the town by moving the boundary of the wards of Portstewart and Atlantic further to the south.

We recognise that this may well create a problem with regard to the viability of the proposed Dundooan ward, as this area to the south of Portstewart is one of only two population centres in the ward – the other being Drumadragh. This is no excuse for forcing the people on the southern fringe of Portstewart town into a ward which stretches as far east as Bushmills and as far south as Ballymoney.

If necessary the proposed Dundooan ward should be abolished and incorporated into other wards, with major roads such as the Coleraine – Bushmills road used as new boundaries. Whatever is decided, the name Dundooan refers to a townland between Portstewart and Coleraine, and could never be said to accurately reflect the identity of this ward.

We also have an issue with the shape and name of the proposed Atlantic ward, which appears to include very few electors from Portrush in the shape of a small pocket in the Dhu Varren area and Dhu Varren estate.

We consider that Atlantic should be re-named Portstewart East, and Portstewart ward be re-named Portstewart West, with the electors in the Portrush portion of the proposed Atlantic ward being transferred to the proposed Hopefield ward so that they are included with fellow Portrush residents. The boundary between the new Portstewart East and Hopefield wards should then be drawn at a convenient point along the coast road between the two towns of Portstewart and Portrush. We would suggest that the railway line could be used as part of the boundary.

We are also concerned at the name of the proposed Portrush ward, which actually includes the entire coastal strip as far east as Portballintrae. The name “Portrush & Portballintrae” or even “Whiterocks” would more accurately reflect the content of the ward.

We also propose that the boundary between the wards of Garvagh and Kilrea should be moved a few miles eastwards towards Kilrea town to better reflect the local identity of people in that area.

We also noticed in the table of wards on page 200 that there was a ward listed as “Lurigethan” which appeared to approximate to Cushendall. We propose that this ward be known as Cushendall to reflect the name of the town which provides the vast majority of electors in that ward.

We also propose some modifications to wards around Ballymoney town, which we propose to expand upon at the local public hearing.

In **Mid-Antrim** we would recommend that consideration be given to re-drawing the boundary between the wards of Craigyhill and Cairncastle and Larne Centre and Cairncastle as it does not appear to follow a clearly identifiable feature, and as a result incorporates part of the urban area of Larne town with a neighbouring rural area. We believe that an alternative solution can be achieved. Such a solution should also address the fact that the village of Cairncastle is divided between two wards.

We propose that the Raloo village area be transferred from Woodburn ward to Glynn ward to better reflect its local community identity.

We are also concerned that the village of Broughshane is split between the wards of Broughshane and Slemish and propose that this be re-visited.

CONCLUSION

We are mindful of the need to ensure that the rights of minorities within the new Council areas are afforded protection. We do not seek anything for the Unionist communities in those areas of the Province where they are a minority that we are not prepared to secure for nationalist communities in those areas where they are in a similar position. This is a fundamental principle, and great care needs to be taken to ensure that there is a critical mass of each community in each of the proposed Local Authorities.

In order to build a shared future we believe that it is imperative that minority rights and interests are protected.

Our final comments relate to the term of office of the first period under the control of the new 'Super Councils'. Based on the fact that the new Councils are due to be established in May 2011 in line with the proposed elections for a new Assembly term we would suggest that the first two terms for the councils be for five years to facilitate a period of 'settling in' and that thereafter the Council elections should act as "mid-terms" for the elections to the Stormont Assembly.