

# Cumberland

## Personal Details:

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**Organisation Name:** Broughton Parish Council (Representative of parish/town council)

## Comment text:

**Related subject:** Parish of Broughton

Broughton Parish Council welcomes the opportunity to respond to the Further Draft Recommendations published on 2 December 2025 as part of the ongoing electoral review of Cumberland Council.

However, the Parish Council wishes to record its strong objection to these newly proposed warding arrangements, which appear to have been formulated based on the opinion of a single non-resident.

Great and Little Broughton together form Broughton Parish and sit proudly on the “sunny side” of the River Derwent, whose surrounding fields form a natural flood plain. The A66, an extremely busy trunk road, also provides a clear and established physical division between communities. Broughton is a socially mixed community with a strong identity, shaped by its industrial heritage and future opportunities, which it is keen to retain. In recent years, Broughton and Brigham formed a single Allerdale electoral ward with two councillors who, despite differing political alignments, worked effectively together. Each councillor focused primarily on their respective side of the river and A66, rather than attempting to operate the ward as a single, homogeneous area.

Broughton Parish Council lies within the Penrith and Solway parliamentary constituency, alongside Broughton Moor and Dearham. The current proposal would result in the electoral ward being split between two different parliamentary constituencies, which are markedly different in character and priorities, adding unnecessary complexity across a wide area.

There is considerable shared industrial history linking Broughton Parish and Broughton Moor Parish, which remains relevant today. Bridleways and footpaths continue to connect the communities and are well used. The Broughton Allotments, comprising approximately 120 plots and in use since medieval times, have tenants from both parishes as well as neighbouring Dearham.

Local primary schools work closely together through a formal arrangement, building sustainable relationships that support long-term community

cohesion.

The Parish Council prides itself on looking to the future and, to that end, has worked extensively with the various leaseholders and landowners of the Derwent Forest site. This former armaments depot, vacated in 1997, has been the subject of many discussions and proposals for its future and represents one of the largest brownfield sites in the UK.

A community group is already established, with agreed terms of reference, comprising Broughton Parish Council, Broughton Moor Parish Council, Dearham Parish Council and Camerton Parish Council. The Parish Council is keen to ensure that any boundary review reflects future needs and embraces the opportunities presented by the development of this site.

The current proposal would result in the Derwent Forest / Broughton Arms Dump site being divided between wards, and the Parish Council fails to see any sensible logic in this approach. It would divide natural communities with long-standing social and historic ties.

In formalising its objection, the Parish Council is focusing on the Derwent Forest area, which is already experiencing the consequences of recent development. Residents have reported feeling “in limbo” after purchasing homes marketed as being in Broughton, only to find they are located within Broughton Moor Parish. This situation was being positively addressed by Cumberland Council through a Community Governance Review, which is currently on hold, but remains a relevant consideration.

Accordingly, Broughton Parish Council considers the proposal to be flawed both procedurally and substantively, and inconsistent with the statutory criteria set out in Schedule 2 of the Local Democracy, Economic Development and Construction Act 2009 (“the 2009 Act”), which the Commission is required to apply.

Under Schedule 2 of the 2009 Act, the Commission must have regard to the following statutory criteria when conducting an electoral review:

Electoral equality;

Reflecting community interests and identities; and

Providing for effective and convenient local government.

The Commission restates these duties within the consultation document and emphasises the importance of strong, identifiable boundaries and coherent communities (pages 21–22).

Broughton Parish Council submits that the proposed division of the Derwent Forest site fails to meet criteria (2) and (3) and is not required to satisfy criterion (1).

The Derwent Forest / Broughton Arms Dump site is widely recognised as one of the most significant brownfield regeneration opportunities in West Cumbria, with development potential likely to be realised over the next 10–15 years. It is of sufficient scale and importance to have its own spatial policy within the current Allerdale/Cumberland Local Plan (Spatial Policy S18 – Derwent Forest).

The site is a single, cohesive planning and regeneration area, sharing:

Common access routes and infrastructure;

A unified planning and environmental context;

A single future resident population; and

A clear functional relationship with Great Broughton as the primary service village.

The Parish Council is particularly concerned that the Further Draft Recommendations would introduce a ward boundary through the middle of this strategic site, thereby fragmenting governance, representation and long-term accountability.

Planning Policy S18 recognises the strategic importance and unity of Derwent Forest due to its exceptional scale, constraints and regeneration potential. The policy explicitly acknowledges that Derwent Forest requires:

A comprehensive and coordinated approach to redevelopment;

Consideration of a mix of uses to ensure long-term viability; and

Strategic oversight reflecting its unique status within West Cumbria.

Although a planning document, this provides clear evidence of the Local Authority's intent to treat Derwent Forest as a single, coherent regeneration site, rather than land capable of arbitrary subdivision.

The Local Government Boundary Commission has repeatedly emphasised that ward boundaries should align, where possible, with recognisable places and functional geographies. To divide a site that has:

Been identified in planning policy as a single regeneration area;

Been subject to a unified planning and development management approach; and

Is expected to evolve into a single new community;

would be inconsistent with both planning logic and electoral good practice.

The Parish Council further notes that:

72 residential units have already been approved within the Derwent Forest area; and

Future residents of this and subsequent development phases will naturally align with Great Broughton for services, facilities, community life and parish engagement.

These approved dwellings are not cited as justification for retrospective change, but as clear evidence of emerging and future community identity, which the Commission is expressly required to consider.

The Commission itself recognises elsewhere in the report that communities with shared geography, issues and governance needs should not be split, including its acceptance of the Melbreak Communities argument in Rural Central Cumberland.

The same principle applies with equal, if not greater, force to a large, unified regeneration site.

The proposed split of Derwent Forest would significantly undermine effective and convenient local government, contrary to the third statutory criterion. In particular, it would:

Require multiple ward councillors to represent different parts of the same regeneration project;

Fragment planning oversight for a long-term, phased development;

Create ambiguity for residents, developers and statutory consultees regarding representation and accountability; and

Complicate parish-level engagement, neighbourhood planning and infrastructure planning.

The Commission's own guidance states that warding arrangements should assist councils in discharging their functions effectively and conveniently. Dividing a single strategic development site across wards achieves the opposite.

Broughton Parish Council further notes that it has already submitted a request for a Community Governance Review (CGR) under the Local Government and Public Involvement in Health Act 2007, seeking:

The inclusion of the approved 72 dwellings within Broughton Parish; and

Consideration of bringing a wider part of the Derwent Forest site into Broughton Parish, reflecting its functional and community alignment.

Although this CGR request has been placed on hold due to the Boundary Commission consultation, it demonstrates strong and clear local intent and support to keep Derwent Forest as a single site integrated within one community.

The Parish Council notes that electorate forecasts in Appendix A show Rural Central Cumberland wards already fall within acceptable variance ranges by 2030. There is therefore no compelling electoral equality justification for dividing the Derwent Forest site.

Finally, the Parish Council is concerned that this proposal has emerged at a late stage in the review process, during a further draft consultation described by the Commission as limited and targeted.

Given the long-term strategic importance of Derwent Forest, introducing a ward boundary through it at this stage:

Restricts opportunities for affected communities to provide evidence;

Undermines transparency; and

Risks embedding a flawed governance structure with consequences lasting decades.

For the reasons set out above, Broughton Parish Council strongly opposes any warding proposal that would divide the Derwent Forest / Broughton Arms Dump site.

The Council respectfully requests that the Commission:

Retain the entirety of the Derwent Forest site within a single ward;

Support a revised Dearham & Broughton ward reflecting existing and emerging community identity; and

Ensure ward boundaries support coherent long-term regeneration, effective planning oversight and convenient local government.

Broughton Parish Council would welcome further dialogue and is willing to provide additional mapping, planning context or community evidence if required.

## **Attached Documents:**

*None attached*