

# Feedback on Consultation of Boundary Changes and Changes to the Number of Assembly Members in Wales.

## Introduction

The purpose of this document is to **provide feedback on** the proposals outlined by the Boundary Commission for Wales regarding changes to the geographical boundaries and an increase in the number of Assembly Members (AMs) in the Senedd. These changes are suggested on the basis of expanded devolved powers, improved representation, and enhanced legislative efficiency.

This document **explores** the evidence presented, or lack thereof, and **seeks to bring in external evidence to examine** how socio-economic factors, historical context, and accountability concerns are addressed in the proposed model. Additionally, **an** alternative approaches to representation **is** considered, drawing on available research and analysis of the unique needs of Wales's diverse communities.

This document highlights potential shortcomings in the proposal and argues for the need for more evidence-based research before any changes are implemented, ensuring that any reforms serve the people of Wales effectively.

## Case for Change.

After reviewing the document, three main reasons are provided to justify changing the boundaries and increasing the number of Assembly Members (AMs):

- Expanded Devolved Powers
- Improved Representation
- Legislative Efficiency

However, the document does not provide or cite evidence to support the claim that increasing the number of representatives or altering geographical boundaries would effectively improve these attributes. Indeed, a 2020 report from Stratford-upon-Avon Council found that workload can vary significantly between elected representatives, with time spent on different activities ranging widely and that this suggests factors beyond just population size influence workload (Electoral Review Councillor Workload Survey Final Report, 2020). Similarly, a 2008 study from the University of Manchester (Purdam et al, 2008) noted that workload depends on multiple factors beyond electorate numbers, including:

- Council performance
- Councillor time and resources
- Deprivation levels
- Civic engagement
- Population mobility
- Non-registered/ineligible populations

While one of these sources is not a peer-reviewed publication, they both highlight the limited available research on this critical issue. If the absence of evidence is accurate, it underscores the need for more research before implementing any changes.

An additional concern is that expanded devolved powers and legislative efficiency often depend on the support infrastructure, such as secretariat services, rather than just the number of elected representatives.

## Proposed Changes

The document states that boundaries were determined using a combination of factors, including:

- **Local Government Boundaries:** Counties, boroughs, electoral wards, etc.
- **Special Geographical Considerations:** Physical features like mountains, rivers, and islands.
- **Local Ties:** Attempts are made to preserve community boundaries unless necessary to meet electorate size requirements.
- **Statutory Electorate Range:** Constituency size must meet statutory electorate size limits, with flexibility for geographical or local ties.
- **Contiguity:** Constituencies must share boundaries and have good transport or communication links.

However, the weighting of this mechanism was not discussed within the paper. A rough analysis of the proposed constituencies (table below) suggests population estimates significantly influenced boundary decisions. However, as Purdam (2008) indicates, population size is not a strong determinant of representative workload.

Constituency	Geographical Coverage (km <sup>2</sup> )	Population Estimate (2021 Census)
Bangor Aberconwy Ynys Môn	~1,800	~98,000
Clwyd	~1,000	~105,000
Alyn, Deeside and Wrexham	~700	~145,000
Dwyfor Meirionnydd, Montgomeryshire, Glyndŵr	~4,000	~110,000
Ceredigion and Pembrokeshire	~4,300	~128,000
Carmarthenshire	~2,400	~185,000
Swansea West and Gower	~600	~140,000
Brecon, Radnor, Neath and Swansea East	~3,000	~170,000
Aberafan Maesteg, Rhondda and Ogmore	~900	~145,000
Merthyr Tydfil, Aberdare and Pontypridd	~800	~160,000

Blaenau Gwent, Rhymney and Caerphilly	~700	~165,000
Monmouthshire and Torfaen	~1,500	~150,000
Newport and Islwyn	~800	~160,000
Cardiff East and North	~400	~160,000
Cardiff West, South and Penarth	~300	~170,000
Vale of Glamorgan and Bridgend	~600	~160,000

This table highlights that population was likely a key factor in boundary decisions. However, the mixed evidence surrounding population as a determinant of workload casts doubt on whether this is the optimal approach.

## North-South Divide

Given the relative populations of North and South Wales, the proposal will increase the percentage of representatives for South Wales constituencies relative to the North Wales constituencies. Given the historic, economic, social, and political differences that exist between North and South Wales this appears incongruent to a representative mechanism. Equally it cannot be denied that the population in the South of Wales is greater than that of the North. However, the change has potential to exacerbate regional divides and be seen as divisive.

## A mechanism for an accountability sinkhole.

An accountability sinkhole is a system or process in which responsibility is spread so widely or divided among so many layers that it becomes impossible to pinpoint who is ultimately accountable for failures or poor decisions. In such systems, individuals or institutions can avoid blame or scrutiny because the complexity of the structure makes it difficult to hold any single entity responsible. This phenomenon is particularly prevalent in large organizations, government agencies, or regulatory bodies, where decision-making is fragmented, and oversight is weak, leading to a lack of meaningful accountability despite formal mechanisms being in place.

An argument could be made that by having 6 representative for each area, each representative could focus on specific aspects of the diverse the historic, economic, social, and political differences that exist within the proposed boundaries. Equally it could be argued that such a mechanism is an accountability sinkhole with constituents unsure if there representatives are there to represent there views of the

views of a specific community within the area. In the Westminster Electoral areas the accountability for decisions taken by elected representatives is very clear, the buck stops with them. We ask politicians to make incredibly difficult decisions some time, decisions that are unlikely to meet the hopes, aspirations, beliefs, views, or values of all constituents. However, in this method the elected representative can share a rationale with the electorate, if challenged on an issue. This also gives the electorate a means to assess the alignment of their elected representatives with their own hopes, aspirations, beliefs, views, or values when elections take place. Whilst this is a simplistic and naive characterisation of the current situation it highlights the contrast between having 6 area representatives with a single area representative.

## **A proposal for an alternative methodology**

It should be noted that first and foremost in my opinion there is a need for

- 1) An evidence based case for change to be made to the people of Wales.
- 2) An evidence based mechanism to ensure representation of the diverse historic, economic, and social populations in Wales.

However, if asked what a representative mechanism might look like, in the apparent absence of peer reviewed evidence I would suggest that the mechanism needs to go further than that proposed by Purdam et al (2008) and should include social economic factors as they relate to current devolved powers. Based on this I would also include the following board factors.

- Rural, urban and suburban factors
- Economic and Cultural Factors such as
  - Agricultural Regions
  - Tourism Zones.
  - Industrial Areas.
  - Cultural Regions.
- Geographical and Infrastructure Constraints:
  - Coastal Regions
  - Inland/Rural
  - Industrial Corridors

Using these factors a rough cluster analysis was run using the best data I could find, which was not good data, and concluded that 45 constituencies was a good fit for Wales based on these factors. A more rigorous methodology using better data will likely produce a different outcome, quite possibly with a larger number of representatives. This was included only to demonstrate that alternative methods are possible and have

potential to be more representative of the diverse communities of Wales than the current proposal is.

## Conclusion

The consultation document lacks sufficient evidence to justify changes in the number of AMs or the proposed boundary adjustments. Without a clear, evidence-based rationale, it is difficult for the public to engage meaningfully in the consultation. If change is warranted, the current proposal is just as unlikely as it is likely to meet the stated needs effectively, and risks creating greater disparities between North and South Wales.

Additionally, the multi-representative model poses significant accountability concerns. The consultation process should either provide a stronger evidence-based case for these changes or retract the proposal pending further research. Commissioning studies on effective representation in Wales and assessing the challenges facing the Assembly in fulfilling its mandate would allow for more informed and effective reform.

## References

[Electoral Review Councillor Workload Survey Final Report 2020.pdf \(stratford.gov.uk\)](#)

Kingsley Purdam, Peter John, Stephen Greasley, and Paul Norman, 2008, How many elected representatives does local government need? A review of the evidence from Europe [Elected-reps-WPversion.pages \(manchester.ac.uk\)](#)