



The Scottish Parliament
Pàrlamaid na h-Alba

Local Government, Housing and Planning Committee

Andrew Kerr
Chair

Independent Review of the Process for Determining Electoral Boundaries

14 November 2025

Dear Andrew,

Independent Review of the Process for Determining Electoral Boundaries in Scotland

Thank you for sharing the draft report on the outcomes of your Review of the Process for Determining Electoral Boundaries in Scotland with the Local Government, Housing and Planning Committee.

The Committee considered the draft report at its meeting on 11 November. We have already set out our views in our letter of 5 September.¹ We reiterate here that we do not believe there is a consensus view on the need for change.

The Committee agreed that I should write to you on three matters:

- Your representation of the parliamentary process for considering local authority electoral boundaries;
- The evidence on which your conclusions are based; and
- Our view on the importance of community cohesion.

Representation of the parliamentary process for considering local authority electoral boundaries

The draft report says:

“In recent years, some of Boundaries Scotland’s recommendations for local government electoral arrangements have been rejected by the Scottish Parliament.”

¹ [Letter](#) to the Chair of the Independent Review of the Process for Determining Electoral Boundaries in Scotland – 5 September 2025

This would appear to be a reference to the Local Government, Housing and Planning Committee's consideration of two affirmative instruments in 2021.²

On that occasion, the Committee recommended that the Parliament should not approve the instruments (which would have implemented Boundary Scotland's recommendations for two local authority areas – Highland and Argyll and Bute).

In response, the Scottish Government chose to withdraw the instruments rather than inviting the Parliament to approve them. As a result, the Scottish Parliament did not come to a view on these Boundaries Scotland recommendations.

They were not therefore rejected by the Parliament.

Rather, the Scottish Government sought the Parliament's permission to withdraw the instruments so that it might instruct Boundaries Scotland to undertake a second review. The then Deputy First Minister said:

"I consider that the appropriate action for ministers to take is to ask Boundaries Scotland to take a further look at the proposals."³

This has still not happened. In evidence to the Standards, Procedures and Public Appointments Committee in 2024, the now Chair of Boundaries Scotland, Professor Ailsa Henderson, said:

"...after the fifth review, some of our proposals were rejected, and then after the islands review, some others were rejected. We then went to the Deputy First Minister at the time and said that, until the approvals process is clarified, it does not make sense for us to continue to generate proposals. We would be fulfilling our statutory duties and doing the job appropriately, but those proposals could be rejected for questionable reasons."⁴

Your description of the current process also omits the role of a parliamentary committee in considering affirmative instruments.

The Committee requests that the final report accurately reflect the parliamentary process for considering previous instruments to give effect to Boundaries Scotland's proposals for local authority electoral boundaries.

Consultation

Your report does not include a copy of the terms of reference you were given to undertake the review.⁵ These, and other statements made by the Scottish Government in Parliament and correspondence to this Committee, make it clear that automaticity was the preferred option of the Scottish Government.

² Local Government, Housing and Planning Committee, [Electoral Arrangements Regulations](#), 1st Report, 2021 (Session 6) – 30 September 2021

³ Scottish Parliament, Official Report, 7 October 2021, Col 114

⁴ Standards, Procedures and Public Appointments Committee, Official Report, 28 March 2024, Col 4

⁵ [Letter](#) from the Minister for Parliamentary Business to the Convener – 24 April 2025

In our response to your consultation, we highlighted the importance of considering the status quo with equal weighting and urged you to do so.

We said:

“We are concerned by the justification for this Review as we do not agree there is a “broad consensus” in favour of removing Parliamentary oversight. This is not demonstrated by the results of the Scottish Government’s consultation. We are also concerned the result of the Review has been pre-determined. The Committee believes the Terms of Reference should have focused on whether change is needed, with options for change as a secondary concern, rather than the Scottish Government’s preferred outcome. We urge you to include consideration of whether change is needed in your report on the outcomes of the Review.”⁶

In your report you have outlined the direct consultation you have carried out as well as referencing a public call for views. The results of this are not included in the draft report which means the views of each of the organisations listed are not available for analysis.

The Committee seeks your assurances the submissions you have received will be published so that the views expressed can be compared.

Importance of community cohesion

We sought assurances from the then Minister for Parliamentary Business as to how the review would:

“... take into account the historical, community and geographical links to electoral boundaries which are not determined by population numbers (for example in island and rural communities).”⁷

The Committee believes it is important that community cohesion is considered during boundary reviews and that there is a mechanism by which communities can comment on these. Members of the Committee are aware of examples of where this has not been maintained during re-alignment of boundaries.

While we note you have proposed solutions which incorporate consultation processes with communities, the ultimate decision would lie with Boundaries Scotland, and not with communities or those who represent them.

The Committee looks forward to the publication of the final report.

To reflect the confidential status of your draft report, this letter is not being published. However, it would be my intention to publish it following publication of your report, in the interests of transparency.

⁶ [Letter](#) to the Chair of the Independent Review of the Process for Determining Electoral Boundaries in Scotland – 5 September 2025

⁷ [Letter](#) from the Convener of the Local Government, Housing and Planning Committee to the Minister for Parliamentary Business – 27 February 2025

Yours sincerely,

Ariane Burgess MSP
Convener