

MEMORANDUM

TO: TOWN COUNCIL

FROM: SENIOR MANAGEMENT STAFF

DATE: JULY 29, 2022

RE: 2022 MUNICIPAL BOUNDARY REVIEW PROCESS

1. FACTS

Section 369 of the *Municipal Government Act* (MGA) requires that:

- (1) In the year 1999, and in the years 2006 and every eighth year thereafter [2022] the council shall conduct a study of the number and boundaries of polling districts in the municipality, their fairness and reasonableness and the number of councillors.*
- (2) After the study is completed, and before the end of the year in which the study was conducted, the council shall apply to the Board to confirm or to alter the number and boundaries of polling districts and the number of councillors.*

The “Board” refers to the Nova Scotia Utility and Review Board (NSUARB), the body who process the applications.

A “polling district” is defined in section 2 (1) (x) of the *Municipal Elections Act* as including “...a ward or town which is not defined into wards”.

The MGA defines a “councillor” as a “...council member other than a mayor”. Consequently, this report will **not** address the office of the Mayor, but rather, the number of Councillors and the area they represent.

This report outlines the process to best prepare for the MGA Section 369 application in terms of the decisions to be made (including background analysis

and staff recommendations) and a proposed public engagement process for Council's consideration. The Board requires public engagement to take place prior to Council's decisions on the number of polling districts and Councillors.

2. ISSUES AND OPTIONS ANALYSIS

The NSUARB's *Municipal Boundaries User Guide* recommends a two-step process. "At the first stage, council should decide the desired number of councillors (i.e., the size of council). Questions about the distribution of polling districts should be addressed in a second stage." (Attachment A)

Public consultation is considered "an inherent part of the required study... to express their views on the size of their council... or whether a town should be divided into wards".

This report addresses the elements in MGA Section 369 and the NSUARB decision that should be addressed in the Town's 2022 study/submission:

- (a) Number of councillors;
- (b) Number of polling district(s);
- (c) Boundaries of polling district(s);
- (d) Fairness of polling district(s);
- (e) Reasonableness of polling district(s); and
- (f) Pre-hearing public consultation process.

Statistical data referred to in the sections below have been compiled into the attached *Nova Scotia Towns - Data Chart* (Attachment B). Sources for the data include Statistics Canada's 2021 Census and the Association of Municipal Administrators of Nova Scotia (AMANS) data from the 2020 municipal elections.

Background on elements to be addressed is below.

(a) Number of Councillors

- Based on the chart, the average number of Councillors in NS's 25 towns is 5.2. 15 towns elect six councillors, 10 towns elect four councillors.
- It should be noted that the town with the closest population to Lunenburg (2,396) is Berwick (2,455) also elects six councillors, as does Mahone Bay (1,064). Other towns a little larger than Lunenburg such as Pictou (3,107), Port Hawkesbury (3,210), Stellarton (4,007) and Westville (5,057) elect four.
- In previous MGA Section 369 submissions, reducing the number of councillors from six to four was considered. While there would be an approximate

\$31,420.00 savings with the reduction of two Town Councillors in Lunenburg (per the Nov 1, 2022-Oct 31, 2023 level), any savings may or may not be outweighed by other concerns.

Six vs. Four Councillors

- It was felt that by decreasing the number of Councillors, Council's workload would not be reduced in proportion and the remaining four Councillors would be left to do the work of six Councillors, including additional responsibilities with the UNESCO World Heritage Site designation and municipal utilities.
 - Issues facing municipal government are increasingly complex including such matters as climate change adaptation, financial reporting, and infrastructure demands requiring more time and input by Councillors. Six Councillors can provide a wider range of skills and experience to better represent community interests.
 - Potential candidates in the next election may be discouraged from running for office if they are concerned about increasing time demands, particularly for those with young families.
 - In matters of procedure, issues of achieving a quorum in a reduced Council size are avoided for either absences or a need to recuse from a particular issue.
- ✓ *For reasons listed above, no change is recommended.*

(b) Number of Polling Districts

- The Town of Lunenburg has had only one polling district – the entire Town – for over 100 years per the attached map (**Attachment C**). While at one time a ward system of three polling districts was the practice, this was discontinued in 1909.
- Voters elect municipal representatives “at large” who do not reflect the needs or interests of a particular area or neighbourhood. Town Council members could reasonably be expected to fairly and reasonably represent all residents in such a concentrated geographic area. There is no recollection of any attempt to revert to a ward system in the Town of Lunenburg.
- A review of Nova Scotia's 25 towns reveals that a single polling district is common. Only five towns have a ward system (New Glasgow, Pictou, Stellarton, Truro and Westville) of two to three wards each.

Benefits of a Single Electoral District

- Nova Scotia towns are typically smaller than rural municipalities. Therefore, disparities in neighborhoods or areas within the municipality are less likely, with commonalities of interest not defined by geographic boundaries to the same extent as they may be in larger units.
- When Councillors are elected at large there is arguably a tendency to be less localized than a ward system. Decision making is more likely to be premised on shared community interests and goals.

“The advantages are the council will have the citizens as a whole of the constituency therefore they will be more likely to advocate for policies that will benefit the community as a whole rather than some subsection of the community” (Prof. Kimberly Nelson, Northern Illinois University).

- Citizens have an opportunity to vote on all Council candidates as opposed to one or two only in a ward system. This encourages candidates and elected officials to focus their efforts on the larger community versus a smaller district in a ward system. Less conflict on Council can result as a more collective approach to decision making is taken.
- In a ward system there is evidence of councillors taking a ward focused view of issues and decision making. The article *“Local Government Spending and at-large versus District Representation: Do Wards Result in More ‘Pork’”* says:

“...at-large representatives act so as to reduce both spending and taxes as compared to what ward representatives do. The ward representatives act in a more ‘pork barrel’ framework which results in more spending...This conclusion, of course, depends on whether one thinks a lower spending level is to be preferred” (Prof. Lawrence Southwick, Jr. State University of New York at Buffalo)

- In a ward system, location is everything. There may be multiple candidates for one ward seeking office, and no candidates in another. When the number of people offering to serve in public office decreases, wards could further restrict the number of available candidates. And if an elected councillor relocates in their municipality to a different ward, they could be disqualified from serving.
- In the case of the Town of Lunenburg, where would the defining lines of wards be drawn? What separates one area from another so as to necessitate a geographic ward representation?

✓ *No change is recommended.*

(c) Boundaries of Polling Districts

- If there is to remain only one polling district, no boundary changes are required. There would be only one (1) boundary – the entire Town of Lunenburg.
- ✓ *No change is recommended.*

(d) Fairness of Polling Districts

- In rural municipalities where there tends to be more than one polling district, much consideration is given to this issue. The objective is to ensure one polling district compared to another is not larger in geographic size or population creating a perceived imbalance in elected representative power or responsibilities.
- If in the case of the Town of Lunenburg, there continues to be only one polling district, this argument would not apply. All council members would continue to equally represent all electors.
- The only question would be is it fair to expect a councillor to represent all of the Town's 1,939 electors and 2,396 population? Is this burden too heavy or should council members be responsible for representing a smaller base as would be the case in a ward system?
- If the size of a community and geographic differences are not so large, as in the case of the Town of Lunenburg, responsibility for community governance is shared equally amongst all council members. Further, the Councillor to elector and Councillor to population ratio is still quite low for the Town.

✓ *No change is recommended.*

(e) Reasonableness of Polling Districts

- A similar argument could be made for the reasonableness of the current single polling district system. Lunenburg's current ratio of Councillor to electors is 1:323. Based on the total 2020 population of 2,396, the Councillor to population ratio is 1:399.
- Compared to other NS municipalities this is a reasonable distribution. The Provincial Town average per Councillor to electors is 1:610 and Councillor to population ratio is 1:716.

✓ *No change is recommended.*

(f) Public Consultation Process

The final step to consider is the means by which Council will consult with the public **before** the NSUARB hearing. This is to obtain public input about the number and boundaries of municipal polling districts, whether they are fair and reasonable, and the ideal number of Councillors.

Various methods of conducting public consultation have been discussed and/or applied in previous years. Optional means of public consultation could include: formation of a special purpose committee to study the matter (currently there is a staff project team), conduct public meeting(s), conduct a public survey, solicitation for feedback via the website and social media, etc.

Staff recommended the following elements and schedule:

| Element | Tactic | Timing (2022) |
|--------------|---|---------------------------|
| Promotion | A fact sheet with background information on the purpose of the review and publicizing opportunities for feedback to be posted on the Town website and social media channels with a feedback email provided | w/o Aug 8 |
| Promotion | Print poster to be shared on physical community bulletin boards | w/o Aug 8 |
| Promotion | News release to local media on opportunities to engage | w/o Aug 8 |
| Promotion | Print version of the fact sheet re public meeting to be mailed out with Town bills | w/o Aug 15 & 29 TBA |
| Consultation | Electronic public survey | w/o Aug 15-22 |
| Consultation | Print version of same survey available at Town Hall | w/o Aug 15-22 |
| Consultation | Prepare PPT presentation for public meeting | w/o Aug 15-22 |
| Promotion | “Lighthouse Now” newspaper ad re public meeting date (submission by Aug 19) | Wed Aug 24 issue |
| Reporting | Interim report of survey results to Council in Agenda package of special Public Meeting | w/o Sep 5 (tentative) |
| Consultation | Hold in-person/Zoom hybrid special public information meeting at Council | Tue Sep 12 (tentative) |

| | | |
|-----------|---|-----|
| Reporting | Staff report combining the survey and meeting feedback results to Council or Committee of the Whole | TBA |
|-----------|---|-----|

(g) Next Steps

After the public consultation is completed:

- i. Town Council decides on the parameters of the application to the NSUARB as outlined in section 2 of this memorandum. This could be discussed at Council or referred to Committee of the Whole.

Note: In the NSUARB’s *Municipal Government Act Rules*, there is different application content to accompany the application depending on whether there are or are not polling districts or wards. An excerpt of the applicable section is attached (**Attachment D**).

- ii. Town submits a Municipal Boundary Review application to NSUARB – due before Dec 31, 2022.
- iii. NSUARB will schedule a public hearing. They typically hold their public hearing in the local municipality. The Town could assign the Town Solicitor to represent the Town at the hearing or have the Mayor or CAO perform this duty. There may be legal and procedural issues that arise during the course of the hearing.
- iv. The Town would make its submission (i.e., present its application) and the Board or members of the public would be invited to comment.
- v. NSUARB will render their decision in writing within 60 days of the hearing.

3. FINANCIAL IMPACT

There could be a financial savings if the number of councillors is decreased from six to four in the amount of \$31,420.00 (per the Nov 1, 2022-Oct 31, 2023 level).

There will be advertising costs for a newspaper ad in the call for public consultation (estimated \$149.50 + HST). Two newspaper ads are required for notification of the NSUARB’s public hearing when scheduled (estimated \$299.00 + HST). Costs to print small posters and/or bill inserts would be handled internally.

If the Town Solicitor is engaged to represent the Town at the Board hearing, legal fees will apply.

4. **STRATEGIC PLAN RELEVANCE**

Strategic Direction

- **Governance:** A town where positive relationships, communication, continual engagement, and shared vision are the foundation to municipal decision-making.

The Municipal Boundary Review is a requirement of the Province of Nova Scotia under the *Municipal Government Act*.

5. **RECOMMENDATION AND DRAFT MOTION**

Draft Motion: moved and seconded that Council approve the recommendations in Items 2 (a)-(e) as well as the public consultation process outlined in Item 2 (f) of this “2022 Municipal Boundary Review” memorandum.

OR

Council may prefer that discussion on these items take place in a Committee of the Whole meeting or prefer to proceed with discussion at Council.

Draft Motion: moved and seconded that the staff report “2022 Municipal Boundary Review” be referred to Committee of the Whole for a fuller discussion.

Attachments - 4

Acknowledged only by:

Jamie Doyle
CAO

USER GUIDE

Statutory requirements for applications

Every eight years since 2006, the council of every municipality and town in the province must study the number and boundaries of its polling districts, their fairness and reasonableness and the number of councillors. After it completes the study, and before the end of the year, the council must apply to the Board to confirm or to change the number and boundaries of polling districts and the number of councillors. For towns that elect councillors at large, an application must be filed with the Board to confirm or change the number of councillors.¹

The Board must consider several factors to decide the number and boundaries of polling districts, including the number of electors, relative parity of voting power, population density, community of interest and geographic size.² To determine the number of councillors for a town, the Board must consider the population and geographic size of the town.³ The position of mayor is not included in the number of councillors and does not fall within the scope of the Board's review.⁴

Recommended two-step process for study

In past decisions, the Board provided specific guidance to municipalities and towns about municipal boundary applications.

Council may decide to hire a consultant or third party to do the required study, but it does not have to. Many councils direct senior municipal staff to conduct the study, in some cases aided by committees which include members from the public.

The Board recommends a two-step process. At the first stage, council should decide the desired number of councillors (i.e., the size of council). Questions about the distribution of polling districts should be addressed in a second stage.

Deciding the size of council involves considering the desired style of the council, the governance structure of the council, and a determination of an effective and efficient number of councillors. The style of government should not be decided until adequate public consultation has occurred. The size of council and its governance structure is a matter which can then be decided by council in an informed debate.

Once the number of councillors and polling districts is decided, the task becomes one of distributing the polling districts, balancing the number of electors, relative parity of voting power, population density, community of interest and geographic size.⁵ As with the number of polling districts, public consultation is essential to a successful boundary setting process.

¹ *Municipal Government Act*, S.N.S. 1998, c. 18, s. 369. Part XVI of the *Municipal Government Act* applies to the Halifax Regional Municipality (*Halifax Regional Municipal Charter*, S.N.S. 2008, c. 39, s. 364).

² *Municipal Government Act*, s. 368(4).

³ *Municipal Government Act*, s. 368(5).

⁴ The definition of "councillor" means a council member other than the mayor (*Municipal Government Act*, s. 3(p)).

⁵ *Municipal Government Act*, s. 368(4).

Ideally, the public consultation process should mirror the two-step process outlined above, but the Board recognizes that for smaller municipalities or towns (or in instances where the first round of consultation has shown a preference to substantively maintain the status quo, including its boundaries), a second round of public consultation may not be practical or necessary.

Public consultation

Public consultation is an inherent part of the required study. The type and amount of consultation is within council's discretion, but it should give members of the public an opportunity to express their views on the size of their council, upon the location of boundaries for town wards or municipal polling districts, or whether a town should be divided into wards, should that be applicable. Giving the public an opportunity to provide its valuable input is a key part of the decision-making process leading to an application by a municipality or town.

Relative parity of voting power

The target variance for relative parity of voting power should be $\pm 10\%$ from the average number of electors per polling district or ward. The municipality or town must justify any variance exceeding this target in its application to the Board. The larger the proposed variance, the greater the burden on the municipal unit to justify the higher variance from the average number of electors. Factors that may support higher variances include the need to accommodate population density, community of interest or geographic size.

Polling district boundary descriptions

The municipal unit must supply descriptions of the existing and proposed municipal polling districts (or the wards in the case of towns). In most cases, the descriptions are in written form, which is acceptable to the Board. However, in recent years, municipalities and towns have asked to provide the descriptions of their polling districts or wards using digital GIS technology.

The Board will accept digital mapping descriptions instead of text descriptions, but in addition to filing a large hard copy map showing all polling districts, the Board also requires individual digital mapping for each polling district or ward. The individual mapping is to be filed by way of hard copy (8.5 x 11-inch format) and electronically (JPEG). The Board is mindful that due to differences in the size of the respective polling districts, the relative scale on each of the maps may differ.

Regardless of the format adopted by a municipality or town, the description must be able to address any inquiry made by electors or municipal election staff during a municipal election. The scale of any digital mapping descriptions must be able to respond to any inquiry.

Hearing - general procedure

When an application is received, the Clerk of the Board will contact the municipality or town to schedule a public hearing. Once the hearing date is confirmed, a notice of hearing will be prepared by the Clerk of the Board and published twice in a local newspaper. The notice will invite members of the public to apply to participate in the hearing as a formal intervenor or to comment on the application by way of providing a letter of comment or registering to speak in person at the hearing. The Board will bill the municipality or town for the cost of these advertisements. The Board will also direct the municipality or town to post the notice of hearing on their social media accounts.

When no change to the number of polling districts and councillors is requested, and no member of the public has contacted the Board to oppose the application or to request to speak at the hearing, the Board may hold the public hearing by telephone or video conference. When the application requests a change to the number of polling districts and councillors, or if there is a material change proposed to the boundaries of the polling districts, the Board will likely conduct the public hearing in person. However, the Board reserves the right to decide the format of the hearing in each case.

The Board normally holds in-person public hearings in the municipality or town where the application arises. Outside HRM, Board hearings are usually held in municipal council chambers or other rooms within the municipal building.

Municipalities or towns do not have to be represented by legal counsel but may do so. Most do not, and their applications are presented by one or more of the following: Mayor, Warden, Chief Administrative Officer, Clerk, Chair of the local boundary review committee, etc.

At the public hearing itself, the Board member or panel chair opens the hearing by briefly describing the application and then asking the parties to identify themselves. The Board's hearings are all recorded electronically by a Board hearing clerk who is also responsible for handling the exhibits filed and discussed during the hearing.

During the public hearing, the town or municipality presents evidence through the examination of its witnesses. Each witness is first sworn in or affirmed (whichever their preference) to testify. In the case of municipal boundary hearings, the evidence is typically in the form of a presentation by a municipal official, including a discussion of the study or consultation undertaken by the municipal unit, any report prepared by the applicant, and details contained in the application. After the municipal unit has presented its application, the Board will usually ask questions related to the application. The Board may ask for more information or data to be filed as an undertaking after the hearing.

After the application is presented, the Board will open the hearing to any groups who have formally intervened in the matter and any members of the public who may have comments, either in support or opposed to the application. The Board or the municipal unit representative may ask questions to the intervenors or members of the public who have given comments. At the end of such comments, the town or municipality will be given an opportunity to respond to any concerns or issues raised by the public and to make any final submissions summarizing the key points of their application.

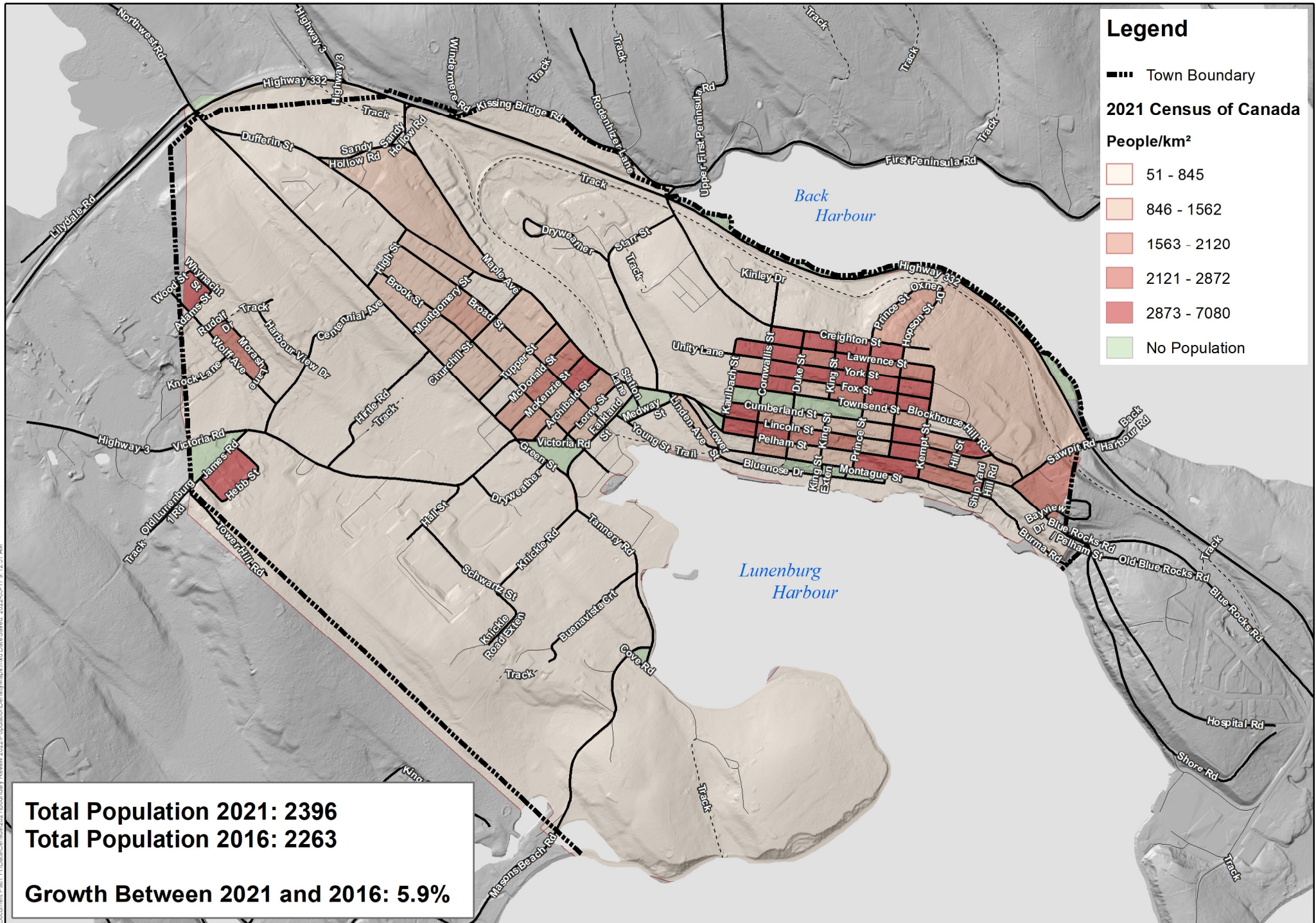
Most municipal boundary review hearings take one or two hours.

Board Decision

The Board normally issues a written decision within 60 days of the hearing. The Board will also issue an Order giving effect to the approved number of councillors and polling districts, and to the boundaries of the polling districts. Where text descriptions are used for the polling districts or wards, the Board may require the municipal unit to submit an electronic WORD or PDF version of the descriptions.

NOVA SCOTIA TOWNS - DATA CHART

| Nova Scotia Towns (x25) | Population (2021 Census) | # of Electors (2020) | Total Private Dwellings (2021) | Land Area (km²) | # Councillors (excluding Mayors) | # of Wards | Councillor: Population | Councillor: Electors |
|------------------------------------|---|---------------------------------|---|---------------------------------------|---|-----------------------|-----------------------------------|---------------------------------|
| Amherst | 9,404 | 7,676 | 4,799 | 12.07 | 6 | 1 | 1,567 | 1,279 |
| Annapolis Royal | 530 | 471 | 364 | 1.98 | 4 | 1 | 133 | 118 |
| Antigonish | 4,656 | 3,937 | 2,675 | 4.98 | 6 | 1 | 776 | 656 |
| Berwick | 2,455 | 1,799 | 1,080 | 6.53 | 6 | 1 | 409 | 300 |
| Bridgewater | 8,790 | 7,200 | 4,493 | 13.63 | 6 | 1 | 1,465 | 1,200 |
| Clark's Harbour | 725 | 650 | 399 | 2.82 | 6 | 1 | 121 | 108 |
| Digby | 2,001 | 1,512 | 1,133 | 3.16 | 4 | 1 | 500 | 378 |
| Kentville | 6,630 | 4,913 | 3,090 | 17.08 | 6 | 1 | 1,105 | 819 |
| Lockeport | 476 | n/a | 307 | 2.32 | 4 | 1 | 119 | n/a |
| Lunenburg | 2,396 | 1,939 | 1,242 | 4.04 | 6 | 1 | 399 | 323 |
| Mahone Bay | 1,064 | 876 | 599 | 3.12 | 6 | 1 | 177 | 146 |
| Middleton | 1,873 | n/a | 977 | 5.55 | 6 | 1 | 312 | n/a |
| Mulgrave | 627 | 580 | 316 | 17.83 | 4 | 1 | 157 | 145 |
| New Glasgow | 9,471 | 7,462 | 4,782 | 9.96 | 6 | 3 | 1,579 | 1,244 |
| Oxford | 1,170 | 931 | 576 | 10.68 | 6 | 1 | 195 | 155 |
| Pictou | 3,107 | 2,551 | 1,600 | 7.99 | 4 | 2 | 777 | 638 |
| Port Hawkesbury | 3,210 | 2,602 | 1,523 | 8.10 | 4 | 1 | 803 | 651 |
| Shelburne | 1,644 | 1,334 | 917 | 8.75 | 4 | 1 | 411 | 334 |
| Stellarton | 4,007 | 3,265 | 2,017 | 8.99 | 4 | 2 | 1,002 | 816 |
| Stewiacke | 1,557 | 1,059 | 739 | 17.62 | 6 | 1 | 260 | 177 |
| Trenton | 2,407 | 1,967 | 1,167 | 6.07 | 4 | 1 | 602 | 492 |
| Truro | 12,954 | 10,421 | 6,658 | 37.52 | 6 | 3 | 2,159 | 1,737 |
| Westville | 3,540 | 2,745 | 1,660 | 14.24 | 4 | 2 | 885 | 686 |
| Wolfville | 5,057 | 4,463 | 2,856 | 6.46 | 6 | 1 | 843 | 744 |
| Yarmouth | 6,829 | 5,352 | 3,569 | 10.57 | 6 | 1 | 1,138 | 892 |
| AVERAGE | 3,863 | 3,028 | 1,982 | 9.68 | 5.20 | 1 | 716 | 610 |



Legend

- Town Boundary

2021 Census of Canada

People/km²

- 51 - 845
- 846 - 1562
- 1563 - 2120
- 2121 - 2872
- 2873 - 7080
- No Population

Total Population 2021: 2396
Total Population 2016: 2263
Growth Between 2021 and 2016: 5.9%

Document Path: H:\Data\Census\2021\Boundary_Review_2022\PopulationDensityMaps.mxd Data Stored: 2022-05-17 9:12:57 AM



Maps are for graphical purposes only. They do not represent a legal survey. While every effort has been made to ensure that these data are accurate and reliable within the limits of the current state of the art. The Town of Lunenburg cannot assume liability for any damages caused by any errors or omissions in the data. Users of our maps and other analysis products are solely responsible for interpretations made from these products.

TOWN OF LUNENBURG

Population/km² - Census of Canada

North

630

Metres

EXCERPT FROM:
Municipal Government Act Rules
made under Section 12 of the
Utility and Review Board Act
S.N.S. 1992, c. 11
N.S. Reg. 114/2017 (July 10, 2017)
amended to N.S. Reg. 89/2021 (effective May 31, 2021)

Municipal boundaries

- 29 (1)** An application under Section 368 or 369 of the Act by a municipality which has been divided into polling districts shall contain the following information:
- (a) a list of the polling districts in the municipality and the number of councillors elected from each;
 - (b) a brief description of each polling district, including the names of the larger communities, its geographic size, any relevant geographic features, and any factors which establish a particular community of interest in the polling district;
 - (c) the latest available population statistics for the municipality and for each polling district; and
 - (d) a table which shows the following information from the most recent municipal election:
 - (i) the number of electors in each polling district,
 - (ii) the total number of electors in the municipality,
 - (iii) the percentage of the total number of electors in each polling district,
 - (iv) the average number of electors per councillor for the municipality,
 - (v) the number of electors per councillor for each polling district, and the number by which it exceeds or is less than the average number of electors per councillor,
 - (vi) the number expressed as a percentage by which the number of electors per councillor in each polling district exceeds or is less than the average number of electors per councillor.
- (2)** Where the application is to confirm the number and boundaries of the existing polling districts and the number of councillors to be elected therefrom, it shall contain the reasons why the status quo should continue.

- (3) Where the application is to change the number or boundaries of the polling districts or the number of councillors elected therefrom, or both, it shall contain an outline of the proposed changes, reasons for the changes, a table similar to that referred to in ~~subsection~~ [clause] (1)(d) which shows an estimate of the elector statistics which will result if the change is approved.
 - (4) The application shall be signed by the mayor/warden and the clerk of the municipality and shall be accompanied by a copy of the resolution of council authorizing or directing the making of the application, certified by the clerk of the municipality to be a true copy of the resolution.
 - (5) An application may be in Form C.
- 30**
- (1) An application under Section 368 or 369 of the Act by a town **which has not been divided into wards or polling districts** shall contain the following information:
 - (a) the number of councillors;
 - (b) the geographic size of the town;
 - (c) the latest available population statistics for the town;
 - (d) the total number of electors in the most recent municipal election:
 - (2) Where the application is to confirm the number of councillors, it shall contain the reasons why the status quo should continue.
 - (3) Where the application is to change the number of councillors, it shall contain an outline of the proposed changes and the reasons for the proposed changes.
 - (4) The application shall be signed by the mayor and the clerk of the town and shall be accompanied by a copy of the resolution of council authorizing or directing the making of the application, certified by the clerk of the town to be a true copy of the resolution.
 - (5) An application may be in Form D.
- 31**
- (1) Every application shall be accompanied by
 - (a) a copy of any advertisement soliciting input from the public in conducting the study;
 - (b) a copy of the minutes of any council meeting and public hearing respecting the study or application;
 - (c) a map showing the boundaries of the existing polling districts;

- (d) a description of the boundaries of the existing polling districts;
 - (e) where the application is to change the number or boundaries of the polling districts, a map showing the boundaries of the proposed polling districts and a description of the boundaries of the proposed polling districts;
 - (f) such additional information as Council determines.
- (2)** Where an application under Section 358 (amalgamation or annexation), Section 368 (polling districts), or Section 394 (dissolution of a town) of the Act is made, the application shall contain, to the extent possible, the information outlined in Rules 29, 30 and 31(1) above, including Forms E and F, depending upon the nature of the application.