

# Governance and Ethics Committee

7 September 2023

**Time** 2.00 pm **Public Meeting?** Yes **Type of meeting** Advisory group

**Venue** Committee Room 3 - 3rd Floor - Civic Centre

## Membership

**Chair** Cllr Rita Potter (Lab)  
**Vice Chair** Cllr Jacqui Coogan (Lab)

### Labour

Cllr Milkinderpal Jaspal  
Cllr Lovinyer Daley  
Cllr Zee Russell  
Cllr Rohit Mistry  
Cllr Anwen Muston  
Cllr Susan Roberts MBE

### Conservative

Cllr Wendy Thompson  
Cllr Jonathan Crofts

Quorum for this meeting is three Councillors.

## Information for the Public

If you have any queries about this meeting, please contact the Democratic Services team:

**Contact** Donna Cope  
**Tel/Email** 01902 554452 or Email: [donna.cope@wolverhampton.gov.uk](mailto:donna.cope@wolverhampton.gov.uk)  
**Address** Democratic Services, Civic Centre, 1<sup>st</sup> floor, St Peter's Square,  
Wolverhampton WV1 1RL

Copies of other agendas and reports are available from:

**Website** <http://wolverhampton.moderngov.co.uk/>  
**Email** [democratic.services@wolverhampton.gov.uk](mailto:democratic.services@wolverhampton.gov.uk)  
**Tel** 01902 550320

Please take note of the protocol for filming, recording, and use of social media in meetings, copies of which are displayed in the meeting room.

Some items are discussed in private because of their confidential or commercial nature. These reports are not available to the public.

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# Agenda

## Part 1 – items open to the press and public

- | <i>Item No.</i> | <i>Title</i>   |
|-----------------|--|
| 1               | <b>Apologies for absence</b>   |
| 2               | <b>Declarations of interest</b>  |
| 3               | <b>Minutes of the previous meeting</b> (Pages 3 - 8)<br>[To approve the minutes of the previous meeting held on 16 March 2023 as a correct record].  |
| 4               | <b>Matters arising</b><br>[To discuss any matters arising from the minutes of the previous meeting].   |
| 5               | <b>Update on the 2023 Annual Canvass</b> (Pages 9 - 14)<br>[To note the timetable for the 2023 annual canvass and provide feedback]  |
| 6               | <b>Evaluation of May 2023 Elections</b> (Pages 15 - 36)<br>[To provide feedback on the May 2023 local elections].  |
| 7               | <b>Boundary Commission for England Parliamentary Boundary Review Final Recommendations</b> (Pages 37 - 344)<br>[To approve the plans and timetable for a statutory review of polling districts and polling places] |
| 8               | <b>Conferring the Title of Honorary Alderman</b> (Pages 345 - 348)<br>[To consider conferring the title of Honorary Alderman]  |
| 9               | <b>2022-2023 Annual Complaints Report</b> (Pages 349 - 376)<br>[To note the contents of the 2022–2023 Annual Complaints Report]  |
| 10              | <b>Information Governance - Annual Report to SIRO 2022-2023</b> (Pages 377 - 402)<br>[To note the contents of the Information Governance Annual Report to SIRO]  |

## Attendance

### Members of the Governance and Ethics Committee

Cllr John Reynolds (Chair)  
Cllr Jonathan Crofts (Vice-Chair)  
Cllr Celia Hibbert  
Cllr Dr Paul John Birch J.P.  
Cllr Louise Miles  
Cllr Phil Page  
Cllr Milkinderpal Jaspal  
Cllr Rita Potter  
Cllr Simon Bennett  
Cllr Wendy Thompson

### Employees

David Pattison	Chief Operating Officer
Laura Gittos	Head of Governance
Tim Clark	Civic Support Manager
Laura Noonan	Electoral Services & Scrutiny Manager
Jas Kaur	Democratic Services & Systems Manager
Donna Cope	Democratic Services Officer

## Part 1 – items open to the press and public

- | <i>Item No.</i> | <i>Title</i>  |
|-----------------|---|
| 1               | <b>Apologies for absence</b><br>There were no apologies for absence.  |
| 2               | <b>Declarations of interest</b><br>There were no declarations of interest.  |
| 3               | <b>Minutes of the previous meeting</b><br>That the minutes of the previous meeting held on 12 January 2023 be approved as a correct record. |
| 4               | <b>Matters arising</b><br>There were no matters arising from the minutes of the previous meeting.   |

5 **Municipal Calendar of Meetings 2023-2024**

David Pattison, Chief Operating Officer, introduced the report: Municipal Calendar of Meetings 2023-2024. The annual report outlined the proposed timetable for Council and committee meetings for the next Council Municipal Year (2023-2024).

Jaswinder Kaur, Democratic Services and Systems Manager, outlined the report, highlighting the key points. It was noted that there would be an additional Scrutiny Board in March 2024, and at the request of the Finance Team, the February 2024 Cabinet meeting was scheduled to take place in half term week.

The report was considered by Committee, and David Pattison, Chief Operating Officer, responded to questions asked.

Resolved:

That Council be recommended to:

1. Approve the City of Wolverhampton Council Municipal Calendar of Meetings for 2023-2024.

That Governance & Ethics Committee:

1. Approved consultation with the political groups on the City of Wolverhampton Council Municipal Calendar of Meetings for 2023-2024.
2. Delegated any amendments to the City of Wolverhampton Council Calendar of Meetings for 2023-2024 to the Chair of Governance and Ethics Committee in consultation with the Chief Operating Officer following consultation with political groups.

6 **Local Election Fees and Charges 2022-2023**

David Pattison, Chief Operating Officer, introduced the report: Local Election Fees and Charges 2022-2023. The report outlined the proposed schedule of election fees for May 2023 and highlighted the key changes. The fees and charges had to be set locally and were regularly reviewed across the West Midlands region to ensure consistency.

Laura Noonan, Electoral Services and Scrutiny Manager, outlined the report and summarised key changes from the previous year. The fees had largely remained the same except for polling staff pay and training fees in order to reflect the additional responsibilities as a result of the Election Act.

The report was considered by Committee.

Resolved:

That Governance & Ethics Committee:

1. Approved the proposed schedule of fees for May 2023.

7 **Update on Preparations for Local Elections**

David Pattison, Chief Operating Officer, introduced the report: Update on Preparations for Local Elections. The report provided an update on the preparations underway for the local elections taking place on 4 May 2023.

The Chief Operating Officer welcomed further suggestions from members on the current arrangements and thanked the Elections Team for their hard work.

Laura Noonan, Electoral Services and Scrutiny Manager, outlined the report, noting that since the agenda had been published the number of Voter Authority Certificate (VAC) applications had increased to 376 and Voter ID leaflets had been printed in the most widely spoken languages across the city.

The report was considered by Committee, and members commended the Elections Team on their hard work. The Electoral Services and Scrutiny Manager responded to questions asked and it was noted that:

- The recommendation to publicise the most common forms of acceptable voter ID would be raised with the Communications Team and fed back to the Chair of Governance.
- Posters advertising the acceptable forms of voter ID and other key election information were currently displayed in libraries, leisure centres and other council venues.
- A list of acceptable voter ID was located inside each polling card.
- British Sign Language students from Wolverhampton University had been recruited to some polling stations across city, and details of these locations could be viewed on the council website.
- The Elections Team proposed to incorporate banners at the bottom of all council internal and external emails, detailing key information regarding voter ID and postal votes.
- Letters would be sent out to those who had not yet returned their annual postal vote signature refresh.
- Following consultation with the Leader, the Leader of the Opposition, and ward councillors, all polling stations were now in place.
- The training for count assistants was scheduled for early April, and as requested by committee, would be filmed, and shared with members.
- Food arrangements would be in place for staff during the election count, and the use of plastic water bottles would be considered.
- Additional measures, including extra staff and venues, had been put in place for processing postal votes to ensure a more efficient approach.

Resolved:

That Governance & Ethics Committee:

1. Noted and provided feedback on the preparations underway for the forthcoming elections.

## 8 **Councillor Enquiry Unit Update**

David Pattison, Chief Operating Officer, introduced the Councillor Enquiries Unit (CEU) Update. It was noted that delays were still being experienced with individual service areas and these were being addressed.

Laura Gittos, Head of Governance, presented an overview of cases received by the CEU over the last municipal year and thanked members for utilising the system.

The update was debated by Committee, and although some members thought the CEU worked well, other members queried the data presented and felt it could be misleading.

The Head of Governance and Chief Operating Officer, replied to questions asked and it was noted that:

- The data obtained by the CEU was used to highlight areas of concern and seek to improve council performance in those areas.
- To avoid confusion, CEU cases that had not been resolved entirely at that time, could be marked as 'paused' instead of 'closed'.
- Digital developments of the CEU system were being looked into and a report on the matter would be taken to the Councillor Development Advisory Group.

Resolved:

That Governance & Ethics Committee:

1. Noted the Councillor Enquiries Unit update.

9 **Councillor Induction Programme and Handbooks (Councillor and Mayoral) 2023-2024**

David Pattison, Chief Operating Officer, introduced the report: Councillor Induction Programme and Handbooks (Councillor and Mayoral) 2023-2024.

The report outlined the proposed roll out of the new Councillor Induction Programme 2023-2024 for new and existing councillors to take place after the local elections held on 4 May 2023.

Laura Gittos, Head of Governance, outlined the report, highlighting key improvements, including additional Councillor sessions and the introduction of city tours. Copies of the new Councillor and Mayoral Handbooks were provided, and the Head of Governance welcomed feedback from members.

The report was considered by Committee, and members thanked officers for their hard work. The importance of Councillor training was acknowledged, and the Chair requested that during their induction, new Councillors be encouraged to access papers via their electronic device.

Resolved:

That Governance & Ethics Committee:

1. Approved the City of Wolverhampton Councillor Induction 2023-2024.
2. Approved the City of Wolverhampton Councillor Handbook 2023-2024.
3. Approved the City of Wolverhampton Mayoral Handbook 2023-2024.

10 **Schedule of Petitions**

David Pattison, Chief Operating Officer, introduced the report: Schedule of Petitions. The report provided an overview of petitions received by the Council over the last six months and outlined the actions taken.

Jaswinder Kaur, Democratic Services and Systems Manager, outlined the report, highlighting the key points. It was noted that petitions were dealt with in line with council's Petitions Scheme, and in cases where the number of signatures was not met, officers would contact residents offering guidance on the requirements.

The report was debated by Committee.

The Democratic Services and Systems Manager responded to questions asked and it was agreed that future reports on the schedule of petitions would include details of what had been done by the service area as a result of the petition.

Resolved:

That Governance & Ethics Committee:

1. Noted the actions taken in relation to all petitions received by the Council during the last year.

## 11 **Monitoring Officer Update**

David Pattison, Chief Operating Officer, provided the following verbal update:

- A workshop to consider the Constitution would be arranged over the next two weeks for members of the Governance and Ethics Committee. This would allow for any changes to be implemented before the next Governance and Ethics Committee in July 2023. The workshop would be hybrid, allowing members to attend physically or online.
- The webcasting equipment in the Council Chamber would be updated at the end of May 2023, and the equipment in there currently would be moved into Committee Room 3, thus allowing the webcasting of meetings from both rooms.

The update was considered by committee, and the Chief Operating Officer responded to questions asked.

Resolved:

That Governance & Ethics Committee:

1. Noted the update from the Monitoring Officer.

## 12 **Presentation on Fairtrade Provision**

The presentation on Fairtrade Provision had been withdrawn from the agenda.

The Chair closed the final meeting of the Municipal Year by thanking Members and officers for their support throughout the previous twelve months. The Committee reciprocated it's thanks to the Chair.

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<b>CITY OF WOLVERHAMPTON COUNCIL</b>	<b>Governance and Ethics Committee</b> 7 September 2023
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<b>Report title</b>	Update on the 2023 Annual Canvass	
<b>Cabinet member with lead responsibility</b>	Councillor Paula Brookfield Cabinet Member for Governance and Equalities	
<b>Accountable director</b>	David Pattison, Chief Operating Officer	
<b>Originating service</b>	Electoral Services	
<b>Accountable employee</b>	Alice Peacock Tel Email	Deputy Electoral Services Manager 01902 550551 Alice.Peacock@wolverhampton.gov.uk
<b>Report has been considered by</b>	Election Board	19 June 2023

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**Recommendation for action or decision:**

The Governance and Ethics Committee is recommended to:

1. Note the timetable for the 2023 annual canvass and to provide feedback on the approach.

## 1.0 Purpose

1.1 To outline the approach and timescales for the 2023 Annual Canvass.

## 2.0 Background

2.1 It is a legal requirement for the Electoral Registration Officer (ERO) to carry out an annual canvass to ensure that the electoral register is up to date.

2.2 This is the fourth year of the reformed annual canvass. The annual canvass started with a national data match of the electoral register with Department for Work and Pension (DWP) records to categorise properties into route one – matched properties (indicating no change in household composition), or route two – no match (indicating a change in household composition). This allows the ERO to take a flexible approach and target resources on properties where there is a change.

2.3 Route one properties receive a 'light touch' canvass, where they are sent a canvass communication but only need to respond if there is a change. The route two properties must respond and are sent multiple different types of communications including a door knock to elicit a response. There is also a route three for properties with a senior responsible officer who can respond on behalf of the residents. In Wolverhampton, Care Homes with a senior responsible officer are assigned to route three.

2.4 The earliest the annual canvass can start by 3 July and conclude by 1 December for the publication of the revised register. Wolverhampton started contacting electors as part of the annual canvass on 4 July 2023.

2.5 The timetable is set out below:

Communication	Date	Detail
Route 1 Canvass Communication A (CCA) Email	4 July	To matched households where an email address is held. They must respond to this.
Route 1 CCA Letter	7 August	To matched households where an email address is not held or where a response was not received to the email. They only need to respond if there is a change. Printed on green paper.
Route 2 Canvass Communication B (CCB) Letter	10 July	To not matched households. Response required. No pre-paid envelope – encourage response online. Printed on yellow paper.

Route 2 Canvass form	15 August	To not matched households who have not responded to CCB form. Response required. Pre-paid envelope provided
Route 2 CCB Telephone canvassing	10 August-7 September	To not matched households where a telephone number is held.
Route 2 Door Knock	13 September-30 October (with potential to extend)	20 canvassers will be employed to carry this out.
Route 3 Contacting responsible officers	1 August-30 November	For Care Homes with lead officers to confirm resident's details

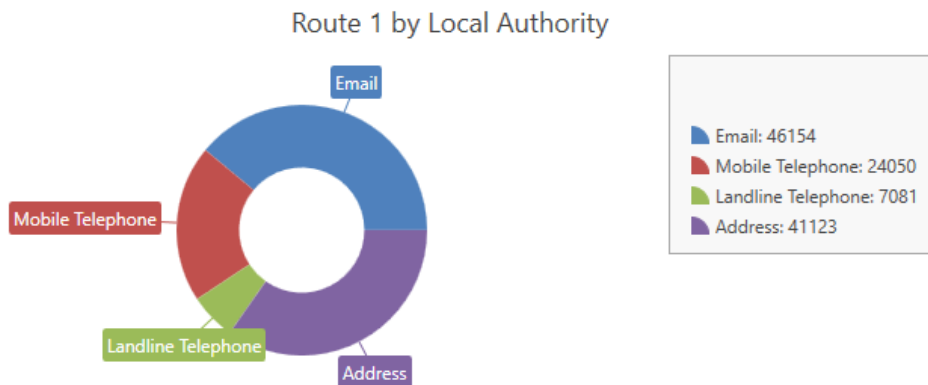
### 3.0 Data match

- 3.1 Before commencing the annual canvass, Electoral Services ran a data matching exercise with national Department for Work and Pensions records, and local council tax and customer service records. The match rate returned for this year was 81% (94,321) of properties that indicated no change in household composition, which was the same match rate as the 2022 annual canvass.
- 3.2 Our data match continues to be above the national average reported by the Electoral Commission which recorded a national match rate of 74.4% in 2022 and 75% in 2021. On a local level our match rate is currently above the 2022 average of 74.2 % recorded for the West Midlands, evidencing a high level of accuracy and completeness in the electoral register.

### 4.0 Route One

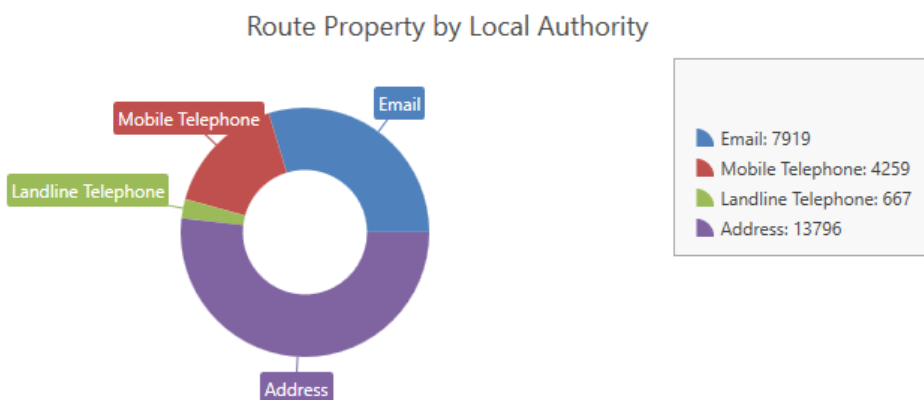
- 4.1 Properties in Route 1 only need to respond if there is a change, except for those who received an initial email as they are required to respond to ensure that the communication has reached the property.
- 4.2 Households without email addresses and those who do not respond to the email will be sent a Canvass Communication Form A (CCA) which is a two-sided A4 letter without a pre-paid envelope. The CCA form shows the names of people registered at the address and will invite them to respond online only if there are changes required. However, the aim with Route 1 properties is not receive 100% response as a response is only required if there is a change.
- 4.3 Emails will be sent to 46,201 properties this year compared to 42,838 in 2022 and 15,507 in 2021. This shows the steady increase in electors submitting their email addresses as part of the electoral registration process. The increase in electors that are contacted via this method reduces the printing costs and administration tasks for Electoral Services allowing for more time to target non-responders in other routes.

- 4.4 In 2022 there were some queries from residents checking whether the email was legitimate as they had not been contacted in this way before. To reduce queries this year communications will be put out in residents' newsletters and on the website to inform residents that they may receive this email.
- 4.5 The table below shows the breakdown of current contact details held for Route 1 electors.



### 5.0 Route Two

- 5.1 All households in this route are required to respond and the ERO is required to contact these households three times and one of these must be a personal canvass such as a telephone call or door knock.
- 5.2 Where telephone numbers are held, telephone canvassing will be undertaken by customer services employees to deliver this service. There are currently 4,926 electors that can be targeted by telephone in Route 2 for this year's canvass.
- 5.3 The table below shows the breakdown of current contact details held for Route 2 electors.



- 5.4 Twenty canvassers will be employed to cover the door knock stage for each ward. They will attend each property for the minimum two required visits and will return to properties that require more targeted canvassing.

5.5 This year the door knock stage has been brought forward one month from last year, the feedback from canvassers was that they preferred working September – October due to the weather and daylight hours. Further extension of the door knock stage can be implemented on a case-by-case basis.

## **6.0 Route Three**

6.1 Route 3 properties are care homes where there is a senior responsible officer who can respond on behalf of all the residents. From August, Electoral Services will take a more targeted approach to generating responses from Route 3 properties including emailing and calling senior responsible officers up to three times. Electoral Services have brought forward the dates for contacting Route 3 properties to allow more time for responsible officers to respond.

## **7.0 Financial implications**

7.1 The annual canvass process is funded from the current electoral registration net expenditure budget of £378,380. [SR/19062023/A]

## **8.0 Legal implications**

8.1 All of the preparations outlined in this report meet the statutory provisions for the annual canvass. [SZ/20062023/P]

## **9.0 Equalities implications**

9.1 The nature of the reformed Annual Canvass enables Electoral Registration Officers to focus resources on the wards where the data indicates that there has been a change in household composition.

## **10.0 All other Implications**

10.1 There are no other implications arising from this report at the current time.

## **11.0 Schedule of background papers**

11.1 Evaluation of Annual Canvass 2022, Governance and Ethics Committee, 12 January 2023

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<p>CITY OF WOLVERHAMPTON COUNCIL</p>	<h1>Governance and Ethics Committee</h1> <p>7 September 2023</p>
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<b>Report title</b>	Evaluation of May 2023 Local Elections	
<b>Cabinet member with lead responsibility</b>	Councillor Paula Brookfield	
<b>Accountable director</b>	David Pattison, Chief Operating Officer	
<b>Originating service</b>	Electoral Services	
<b>Accountable employee</b>	Laura Noonan Tel Email	Electoral Services and Scrutiny Manager 01902 55 5050 Laura.noonan@wolverhampton.gov.uk
<b>Report has been considered by</b>	Election Board	20 June 2023

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### Recommendation for action:

The Governance and Ethics Committee is recommended to:

1. Provide feedback on the May 2023 local elections.

The Governance and Ethics Committee is asked to note:

1. The timeline for the next changes to be implemented in the Elections Act.
2. The date for the next statutory review of polling districts and polling stations.
3. The final parliamentary boundary proposals must be reported to the House of Commons by 1 July 2023. An update report will be brought to Governance and Ethics Committee with further detail.

## 1.0 Purpose

- 1.1 To provide a summary of the areas of success and areas for improvement following the evaluation exercise undertaken on the local elections that took place on 4 May 2023.
- 1.2 To provide an update on the further legislation changes to be introduced under the Elections Act.
- 1.3 To provide an update on the next statutory review of polling districts and polling places.

## 2.0 Background

- 2.1 Following each election, a comprehensive evaluation exercise is undertaken to ensure that lessons are learned to continue to improve on the conduct of elections. Feedback has been captured from the following stakeholders:
  - Returning Officer and Deputy Returning Officers
  - Candidates and Agents
  - Electoral Services Team
  - Voter ID Team
  - Internal teams that support elections – ICT, Customer Services, Communications, Events, Audit
  - Polling Station Staff
  - Count Staff
- 2.2 This was a particularly considerable election to conduct because all 60 Councillor seats were up for election on the new ward boundaries. As a result of the new ward boundaries there was also a significant number of changes to polling station venues.
- 2.3 These were also the first elections to be held since the introduction of Voter ID and the new accessibility requirements for polling stations.
- 2.4 Due to the complexity of these elections, a decision was taken by the Returning Officer to count the votes the next day on Friday 5 May.
- 2.5 There were 185,122 electors eligible to vote at this election, and a total of 48,206 votes were cast. The overall turnout was 26%.
- 2.6 There were 34,061 postal voters, which is 18% of the electorate. 19,063 postal ballot papers were included in the count, which equates to 40% of the total votes.
- 2.7 There were 168 electors who were initially turned away on Voter ID grounds – 113 of these returned with an acceptable form of ID. There were 55 electors who were refused a ballot paper on Voter ID grounds.
- 2.8 There were 65 proxy voters and one emergency proxy appointed.



- 2.9 There were 126 polling stations. A total of 15 schools were used as polling stations, which is a reduction of 9 from the 24 used as the 2022 local elections. There were 6 temporary polling stations, an increase of 3 since the 2022 local elections.
- 2.10 A total of 840 roles were recruited to work on the elections across polling stations, the count and postal vote opening.
- 2.11 There were 153 candidates and 29 election agents.
- 2.12 Wolverhampton received £113,342 Election Act grant funding.
- 2.13 A total of 813 Voter Authority Certificates were issued by the deadline of 25 April.

### **3.0 Evaluation summary**

- 3.1 A total of 222 surveys were completed from key stakeholders. Election Board and key internal services also contributed to evaluation feedback meetings.
- 3.2 Overall, the local election was considered to have been conducted well. The two key areas for improvement identified in the evaluation of the May 2022 elections relating to postal vote opening time and the challenge of recruiting Presiding Officers were very much improved for this election. Overall, there was very positive feedback received on the implementation of the new Election Act measures - Voter ID and Accessibility.
- 3.3 The evaluation is presented below against the following eight key areas to summarise the key successes and areas for improvement:
  - Candidates and Agents
  - Staffing and training
  - Postal vote opening
  - Election printing
  - Polling Stations
  - Verification and Count
  - Voter ID
  - Accessibility

### **4.0 Candidates and Agents**

#### **4.1 Success:**

Candidates continue to be happy with the information provided by the Returning Officer throughout the election period with 100% of Candidates and Agents who responded to the survey either very satisfied or satisfied with the information provided through the

candidates and agents briefings, guidance and weekly emails, including the new information on Voter ID and accessibility. 100% of candidates and agents found the nomination process either excellent, good or very good.

#### 4.2 Area for improvement:

Just 9 out of 183 candidates and agents responded to the evaluation survey. It is recommended that candidates and agents will be reminded of the post-election survey in the candidates and agents briefings to ensure that as many candidates and agents have the opportunity to have their say and contribute to the evaluation exercise.

Councillors were provided with leaflets and Voter ID banners early in the year to assist with raising awareness of the new requirement. A small number of councillors collected their pack. Therefore in future, councillors who wish to use their communication packs will be able to request them rather than being provided upfront.

The nomination period was an intense period for Electoral Services. The vast majority of nominations were not completed accurately first time and many nomination papers were handed in towards the end of the nomination period. Electoral Services will consider producing a video guide to assist candidates with completing their nomination packs as many candidates reported that the video on the count methods was useful.

## 5.0 Staffing and Training

### 5.1 Success:

One of the recommendations made last year was that more senior managers across the council should be recruited to work election duties to assist with the complexity of this election and to train up a pool of employees as Presiding Officers for future elections. A total of 46 heads of service/Directors worked election duties with 19 of these working in polling stations and the rest at the count.

Following the elections last year, over 60 poll clerks were recommended as Presiding Officers by Presiding Officers and Polling Station Inspectors, but some of them needed further encouragement to feel confident to step up to the role. An additional support session was held in December 2022 ahead of appointment letters going out to encourage them to apply. There were 8 poll clerks who stepped up to work as Presiding Officers this year as a result of this support session. Another session will be arranged for this year for the 60 poll clerks who were recommended as Presiding Officers to continue to develop this pool of staff.

A number of Presiding Officers were recruited from authorities that did not have elections this year. However these volunteers will not be available next year where they will be required at their substantive authority.

A total of 23 training sessions were delivered to staff including 8 mock count sessions. 100% of staff who responded to the surveys says that they received sufficient training to carry out their role and there was a lot of positive feedback from staff on the training they received. A video was also produced for candidates and agents to demonstrate the multi-member count.

#### 5.2 Area for improvement:

There were over 150 people who had been recruited to work at the election early in January who dropped out, with many of these dropping out in the week of the election. The reasons for drop out have been reviewed and those without a suitable reason will not be recruited in future. The difficulty to recruit and retain staff to work election duties is experienced nationally and has been reported in the Electoral Commission and Association of Electoral Administrators evaluation reports as it is becoming increasingly apparent fewer people are willing to take on evermore complex polling station roles.

### 6.0 Postal Vote Opening

#### 6.1 Success:

The improvements implemented this year helped to speed up the postal vote opening process on election day. There was an earlier collection made from the Royal Mail sweep and an earlier opening session on polling day. The count taking place the next day helped to ease pressure on the postal vote opening team.

#### 6.2 Area for improvement:

The postal vote opening process takes time to complete and it's important that accuracy comes before speed. Further process improvements will be made to continue to drive efficiency.

### 7.0 Election Printing

#### 7.1 Success:

The postal vote pack design was much improved as a one-piece mailer. There was less confusion from electors. A video guide on how to complete was also created and a link included in the postal vote pack.

#### 7.2 Area for improvement:

The new requirement to list all of the acceptable forms of ID required a new design of the poll card. Many councils changed their poll cards to enveloped letters. Our brief to the printer was for the poll card to still look like the poll cards electors are used to. This did require electors to open the seal. The quality of the paper and sealing was poor and easily ripped. This has been fed back to the print supplier and this will be improved for the next elections.

## **8.0 Polling Stations**

### **8.1 Success:**

96% (155) of polling station staff who responded to the survey said that the polling stations were very good or good. Staff found the information providing in the Presiding Officer folders very useful to carry out their duties on the day.

Every station was provided with Voter ID requirement information in the top 10 languages spoken in the city, produced in conjunction with the equalities team. Polling station staff found this very useful and provided positive feedback.

### **8.2 Area for improvement:**

There were a high number of complaints on temporary polling stations from electors and staff. These will be reviewed as part of the next statutory review. The Electoral Commission staffing ratio guidance increased the number of poll clerks by one to assist with Voter ID. There was feedback from staff that they felt like there were too many members of staff in some of the polling stations. The numbers of poll clerks will be reviewed for some stations for standalone local elections.

## **9.0 Verification and Count**

### **9.1 Success:**

100% (60) of staff who responded to the survey said that they found the count very good or good, and that they had enough information to carry out their role.

Counting the next day was much better and led to more accurate results – there were only a small number of recounts required after verification of each box. 89% of candidates and agents and 87% of staff were very satisfied or satisfied with the count taking place the next day.

The sound and the AV equipment was much improved from last year with the new supplier based in Wolverhampton.

## **10.0 Voter ID**

### **10.1 Success:**

The statutory instrument for Voter ID and supplementary Electoral Commission guidance was published at a very late stage, and access to the ERO portal to process applications for Voter Authority Certificates was granted at the same time as being launched publicly in January, with many of the necessary processing functionality features not ready at launch and continually amended up until close to the VAC deadline day. All of this

created a lot of risk for Returning Officers. The One Council approach to elections was a huge success in implementing Voter ID safely.

A dedicated Voter ID team was established as Improvement Managers and Graduates were deployed to support processing applications for voter authority certificates (VAC) and running drop-in sessions.

Daily drop in sessions were held in the Civic Centre from March up until the deadline, as well as 10 drop in sessions across the city in libraries and leisure centres. A total of 134 electors applied for a VAC at a drop-in session and hundreds of electors were engaged with as part of the awareness raising contact during these sessions.

Internal Audit closely monitored the roll-out of Voter ID and their report concluded that there is substantial assurance over the adequacy of the controls reviewed.

The key aspects that support this conclusion are:

- Appropriate governance and decision making processes for the acceptance and rejection of photos for VACs. There was some ambiguity around the initial requirements i.e. clear plain background. This was later relaxed to allowing photos as long as there was a clear full face image. Regularly meetings were held with the Monitoring Officer, in his capacity as Deputy Returning Officer (DRO), to discuss any images that did not strictly meet the Electoral Commission's original guidance. The Monitoring Officer had the final decision on whether a photo was accepted or not. This was further supported by advice given by the Council's Equalities team. This was also supported by a record of this decision.
- A clear audit trail was maintained in respect of cases where the initial photo was rejected, where there was no national insurance number match, where the applicant was not on the electoral register, duplicate applications, and those cases where an application was received after the VAC deadline.
- Appropriate internal processes and procedures which set out the checks to be undertaken for new VAC applications.
- At the time of this email there were appropriate arrangements in place for the processing, printing and issuing of temporary VACs.
- There were two cases where the Elections Team identified a potential fraudulent application, both these cases were reported to the Police for further investigation. To date neither case has resulted in a prosecution, however both applications were rejected.
- In terms of the checking of voter IDs at polling stations detailed guidance has been produced for the presiding officers and poll clerks on the types of ID that will be accepted, examples of what each type of VAC looks like (including temporary and anonymous ones). The training also covers the various

scenarios that could arise if the elector cannot provide the required ID at the polling station, such as applying for proxy vote up to 5pm on the day of the election.

- There is a provision at each station whereby ID checks that require the removal of a religious face covering can be performed in private.

Please see Appendix 1 for more information.

A comprehensive local communications campaign was launched to amplify the national Bring ID to Vote campaign primarily via digital channels in a direct and cost-effective way, while supporting it with traditional communication channels and activities. Activity was shared across the following channels:

- Media releases
- Social media posts (Facebook, Twitter, Instagram and LinkedIn accounts)
- Social media headers
- Residents e-newsletters
- Councillor updates
- All councillor briefing sessions
- MP communication
- Leaflets for all councillors and prospective candidates
- Display banners distributed to councillors
- Leaflets and banners displayed at council buildings across city
- Leaflet included in council tax booklet to all homes
- Leaflet included in Wolverhampton Homes rent letter
- Digital traffic signage across city
- Digital displays at Civic Centre
- Wolverhampton Chronicle wrap full back page advert
- Community radio
- Leaflets distributed to all care homes
- All CWC internal communications channels

There was a lot of feedback from staff in the survey that the majority of electors voting on the day were aware of the requirement as electors brought their ID.

## 10.2 Area for improvement:

The take up of daily drop-in sessions at the Civic Centre low. Future drop-in sessions would be focused more around libraries where there was higher demand.

## 11.0 Accessibility

### 11.1 Success:

Despite the challenges of late legislation on accessibility being made on 29 December 2022, and Returning Officer guidance being issued in February 2023, a working group was established in Wolverhampton well ahead of schedule in September 2022. The working group represented the views of people with hearing loss, sight loss and learning disabilities and they co-produced the local improvements that were made in addition to the Electoral Commission guidance. One of the most useful introductions was the development of an accessible signage pack on yellow background for people with sight loss and the recruitment of 10 British Sign Language students from the university who were recruited to work in polling stations. This has been shared with the AEA and Electoral Commission as good practice and the working group fed back that they were very impressed with the work that had been undertaken in the short timescales.

### 11.2 Area for improvement:

An accessibility event was booked for March to invite people with disabilities to the Civic Centre to find out more about voting and to walk through a polling station to experience the voting procedure. There was little interest in this event and the feedback was that we need to offer smaller more targeted sessions with various disability groups.

## 12.0 Business Continuity

12.1 This year a detailed review and plan was produced to ensure that from the period December to May we have appropriate contingency in place should anything occur.

12.2 The plan this year also reviewed the electronic system used in the electoral services team, and further work is planned to review this.

## 13.0 Elections Act – Next Steps

13.1 The Combined Authority Mayoral and Police and Crime Commissioner elections taking place in May 2024 will now be on the first past the post system, not the Supplementary vote.

13.2 Draft postal and proxy voting legislation has been published which seeks to:

- Limit the total number of electors for whom a person may act as a proxy to four, of which no more than two can be for 'domestic' electors for all electoral areas.

- Political parties and campaigners will be banned from handling postal votes
  - An identity check will be introduced for all applications for a postal or proxy vote. This will bring the absent vote application process in line with the individual electoral registration process.
  - Postal votes will need to reapply for a postal vote every three years replacing the current five-year signature refresh.
  - Electors will be able to apply for a postal or proxy vote online.
- 13.3 The 15-year limit on voting rights for British citizens living overseas will be removed and the registration period will be increased to 3 years instead of one year.
- 13.4 Automatic candidacy and voting rights will cease for EU citizens. Two groups of EU citizens will retain their rights – qualifying EU citizens and EU citizens with retained rights.
- 14.0 Statutory Review of Polling Districts and Polling Stations**
- 14.1 The next compulsory statutory review of polling districts and polling stations must take place between October 2023 and January 2025. The last polling district review took place in 2022 following the local government boundary review, where substantial changes were made. Therefore, It is expected that this review will see fewer changes.
- 14.2 It is proposed that it will be conducted in October 2023 so that changes are in place for the May 2024 elections. The proposed timetable has been presented below:

<b>Activity</b>	<b>Month</b>
Conduct preliminary review inviting feedback from councillors and prepare schedule of polling districts and places for consultation	August - September
Publish a notice of the holding of the review	2 October 2023
Publish ARO representation	2 October 2023
Public consultation period	2 October 2023– 13 October 2023
Analyse responses and prepare recommendations	16 – 18 October
Governance and Ethics Committee to consider representations and make recommendations to Full Council	26 October 2023
Full Council to consider recommendations from Governance and Ethics Committee	8 November 2023



Amend the electoral software to reflect new polling district and place scheme	November 2023
Publish revised register with new polling districts	1 December 2023

## 15.0 Financial implications

- 15.1 The cost of running local elections to the Council in any year is dependent on whether they are standalone or combined with Parliamentary, Police and Crime Commissioner or Combined Authority Mayoral elections. Combined elections costs are effectively shared, part funded by Government or the Combined Authority.
- 15.2 In the event of combined elections or fallow years, significant underspends against the local elections budget have provided scope for contributions to the Elections Reserve which can be drawn upon in years with increased costs.
- 15.3 The budget for local elections in 2023-2024 is £277,000. As a standalone election, additional funding will also be drawn from reserves as appropriate. This election was forecast to be higher than usual due to the implementation of Voter ID and that it was an all out election. The Council was awarded £113,342 Election Grant funding spanning the 2022-2023 and 2023-2024 financial years. The full cost of the implementation of Voter ID and Accessibility is still being assessed and there is scope to apply for additional funding relating to Voter ID.

[LD/27062023/W]

## 16.0 Legal Implications

- 16.1 All recommendations arising from the report are in line with the statutory provisions covering the delivery of electoral registration and delivering elections activity.

[SZ/20062023/P]

## 17.0 Equalities implications

- 17.1 The elections complied with the public sector equality duty. Reasonable adjustments to voter were made for electors with disabilities in the polling stations and the Returning Officer went above and beyond the Electoral Commission guidance on the Accessibility measures within the Election Act. Polling staff received adequate training on Accessibility.

## 18.0 All other Implications

- 18.1 There are no other implications arising from this report at the current time.

## 19.0 Schedule of background papers

- 19.1 Evaluation of May 2022 Elections, Governance and Ethics Committee, 7 July 2022

- 19.2 Preparations for May 2023 Local Elections, Governance and Ethics Committee, 12 July 2023
- 19.3 Update on Preparations for Local Elections, Governance and Ethics Committee, 16 March 2023
- 19.4 The Representation of the People (Postal and Proxy Voting etc.) (Amendment) Regulations 2003. Available at: [Draft Statutory Instrument: The Representation of The People \(Postal And Proxy Voting Etc.\)\(Amendment\) Regulations 2023 \(publishing.service.gov.uk\)](#)
- 19.5 Voter ID at the May 2023 local elections in England: interim analysis, Electoral Commission, 19 June 2023: [Voter ID at the May 2023 local elections in England: interim analysis | Electoral Commission](#)
- 19.6 AEA 2023 Post Polls Review. Under pressure: increased demand on the UK electoral system, Association of Electoral Administrators, June 2023: [AEA-2023-Post-Polls-Report-27-June-2023.pdf \(aea-elections.co.uk\)](#)

## **20.0 Appendices**

- 20.1 Appendix 1: Audit Report on Implementation of Voter ID

# Internal Audit Report:

## Elections Voter ID

2023/2024



## 1 Executive Summary

### Introduction

An audit of Council's arrangements for the implementation of elections voter ID was undertaken as part of the approved Internal Audit Plan.

On 28 April 2022 the UK Parliament passed the Elections Act 2022, introducing voter identification for in-person voting. This required voters in Great Britain to show a form of photographic identification ('photo ID') before being given their ballot paper in polling stations in certain elections. The first elections this would be implemented on in Wolverhampton were the local elections that took place in May 2023. Electors without a valid form of ID are able to apply for free photo ID called a Voter Authority Certificate (VAC). Each local authority Registration Officer is required to process VAC applications made via the government portal, and to make provision for electors to apply for a VAC by post or in person). The Council were also required to publicise the new voter ID requirements and ensure appropriate arrangements were in place to verify ID at polling stations before the elector was issued a vote.

For the May 2023 elections the deadline for the successful processing of VAC applications was close of play on 25 April 2023. Details around the number of applications received and processed were:

<b>Number of applications received:</b>	<b>922</b>
Number of applications processed and sent for print:	813
Number of applications on hold (i.e. awaiting additional information):	22
Number of applications rejected:	72
Number of applications in progress (i.e. not registered to vote in time):	15

It should be further noted that the Council only issued one temporary VAC following the deadline date of 25 April 2023.

### Objectives, potential risks and scope of audit work

Our audit was conducted in conformance with the Public Sector Internal Audit Standards and considered the following:

Objectives:	To ensure the Council has suitable arrangements in place to implement the new requirements set out in the Elections Act 2022.
Potential Risks:	<ul style="list-style-type: none"> <li>• The Council does not comply with legislation</li> <li>• The elections process is legally challenged and has to be re-run</li> <li>• Delays in election results</li> <li>• Reputational risk to the Council</li> </ul>
Scope:	<p>This review focussed on the following areas:</p> <ul style="list-style-type: none"> <li>• The governance arrangements for overseeing the implementation of voter ID</li> <li>• The resourcing for the processing of VACs and temporary VACs</li> <li>• Publicity and awareness campaigns</li> <li>• The resourcing of polling stations to implement voter ID checks</li> <li>• Post election feedback and lessons learnt</li> </ul>

Limitations to the scope of our audit:	The was a high level review of the process and no testing was performed for the processing of individual VAC applications.
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**Overall Conclusion**

Our audit provides **substantial** assurance over the adequacy of the controls reviewed as part of the process to mitigate risks to an acceptable level.

No Assurance	Limited	Satisfactory	Substantial
Immediate action is required to address fundamental gaps, weaknesses or non-compliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited.	Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.	There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.	<b>A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.</b>

The assurance opinion was given due there being no major issues arising from the changes to the local elections in May 2023. It should be noted there was only one issue where a voter was incorrectly refused a vote due to presenting a Romanian passport as a form of ID. This was due to the presiding not following the guidance presented to them or contacting their polling station inspector.

**Key issues identified**

We rate each issue identified based on the following:

<p><b>Red</b></p> <p>Action is imperative to ensure that the objectives for the area under review are met</p>	<p><b>Amber</b></p> <p>Action is required to avoid exposure to significant risks in achieving objectives</p>	<p><b>Green</b></p> <p>Action is advised to enhance risk control or operational efficiency</p>
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We have identified no red or amber issues where improvements could be made. However, we have raised four issues classified as green which are further detailed in section two of this report.

The key issues arising from this report may be included in summary form to the Audit and Risk Committee.

### Examples of good practice identified

During our review we identified the following examples of good practice in the management of risk, as achieved through the effective design and application of controls:

#### Governance Arrangements

- A project group was established to oversee the implementation of the changes under the new elections act and support the elections team.
- Due to the ambiguity around the guidance given for acceptable VAC photos, weekly meetings were established with the Council's Chief Operating Officer in their capacity as Deputy Electoral Registration Officer to give a final decision on whether a photo should be accepted or rejected. These meetings moved to daily on the run up to the VAC deadline date. These meetings were also attended by officers from the Councils Equalities and Diversity Team to provide support to the process, where required.
- Regular updates were provided to the Council's Strategic Executive Board (SEB) in respect of progress made in respect of the changes.

#### Resourcing of VACs and temporary VACs

- The Council had a designated team, which was sufficiently resourced to process VACs applications.
- All team members received appropriate training on the processing of applications and acceptance criteria.
- The Council provided a gold level service in terms of following up applications where there was incomplete information. This involved sending follow-up emails and also phone calls to chase applicants for outstanding information in order to complete their applications.
- A clear audit trail was maintained in respect of cases where the initial photo was rejected, where there was no national insurance number match, where the applicant was not on the electoral register, duplicate applications, and those cases where an application was received after the VAC deadline.
- There were two cases where the Elections Team identified a potential fraudulent application, both these cases were reported to the Police for further investigation. To date neither case has resulted in a prosecution, however both applications were rejected.

#### Publicity and awareness campaigns

- A detailed communications plan was produced which set out the campaign for informing residents of the city of the new changes and the requirement to provide ID when voting.
- Awareness leaflets were included in the annual Council Tax bills to residents and Wolverhampton Homes rent letters.
- The team visited various Council buildings, including leisure centres and libraries, informing residents of the new changes and the requirement to produce voter ID. This correlated with the number of VAC applications following these events.
- Provided details around the requirements for voter ID on poll cards
- Adverts were placed in local newspapers and chronicles.
- Voter ID awareness material, produced by Government, was printed for all candidates up for election, which could be used as part of their canvassing campaign.
- Awareness posters were also displayed in all Council buildings and a banner was placed on the Council's website.

### **Resourcing of polling stations**

- All polling station staff received detailed training and guidance on the acceptable forms of ID required to vote. This was evidenced by the fact that little if no issues were raised or reported to the polling station supervisors.
- Privacy screens were present at all polling stations
- The Council appointed a number of Voter ID Polling Station Inspectors from Legal Services in addition to Polling Station Inspectors who were available during polling day to resolve any issues raised by Presiding Officers particularly in respect photo ID queries.

### **Resourcing of polling stations**

- The elections team held a lessons learnt exercise to review the outcomes of the current elections to identify where improvements could be made.
- All staff involved in the elections were sent a survey to ascertain their experience of the process and ascertain if there were any issues.

### **Acknowledgment**

Several employees gave their time and co-operation during this review. We would like to record our thanks to all those concerned.

## 2 Findings and Recommendations

Action is advised to enhance risk control or operational efficiency

Green

### 1. Future resourcing of voter ID applications

#### Finding:

As this was the first election where voter ID was implemented the Council established a project team to oversee the processing of Voter Authority Certificate (VAC) applications. In the words of the Elections Team they provided a gold level of service and support to applicants, which involved follow-up emails and phone calls to chase outstanding information required to complete the processing of their application. This also involved the use of manual processes in terms of logging, recording and monitoring the progress of each application, which the team described as being resource intensive. In some cases the team were supporting residents to register to vote as well.

In addition to the processing of VAC applications the team were also involved in awareness campaigns across the city this involved visiting the Council's libraries and leisure centres, which saw surge in applications after these events.

Following the May 2023 local election this team was disbanded, and the processing of VACs has reverted to business as usual. However, going forward, there was uncertainty around the level of support required for future elections and the resourcing requirements, particularly for the next General Election.

#### Implication:

Insufficient resources are in place to respond to demand on the run up to an election

#### (Agreed) Recommendation:

- (i) An options paper will be developed which will set out the future levels of support the Council can provide to promoting and supporting VAC applications along with the resourcing requirements for each option. This should be presented to SEB for approval of the preferred support option.
- (ii) In order to reduce the manual processes for future elections consideration will be given to developing an automated internal solution, alongside the portal, to assist with the processing of VAC applications.

#### Responsible Officer:

Laura Noonan, Electoral Services and Scrutiny Manager

#### Target Date:

30 December 2023



## 2. Notifications via the Government Portal

### Finding:

Based on a post review of elections by the Elections Team one area of improvement identified for future elections was the use of the government portal for sending notifications out to applicants. As part of the process the elections team were not utilising the notifications facility on the portal to inform applicants that their application had been processed successful and their VAC was being printed and posted. By using this facility applicants would able to look out for their certificate in the post and alert the Council if it was not received. This in turn would have reduced the number of calls received in chasing up their application.

### Implication:

Ineffective use of resources in responding applicant update queries.

### (Agreed) Recommendation:

For future elections and business as usual, the notification function on the government portal will be utilised to inform applicants on the progress of the VAC application.

### Responsible Officer:

Laura Noonan, Electoral Services and Scrutiny Manager

### Target Date:

30 June 2023

### 3. Potential budget savings

#### Finding:

As this was the first election where voter ID was implemented the Council put a number of measures in place to promote and ensure compliance with voter ID requirements.

This included printing material for candidates to use as part of the electoral canvassing campaigns. However, there was a low uptake by candidates for the use of this printed material, which resulted in there being surplus stock.

It was also noted the Council appointed a number of Voter ID Polling Station Inspectors (PSIs) to support polling station presiding officers should any queries arise in respect of any forms of ID being presented. Based on information provided by the Elections Team Voter ID PSIs were not called upon during the day of the election, which is testament to the training and guidance given to Presiding Officers and Polling Station Inspectors, and Electoral Services were able to sufficiently respond to Voter ID queries received throughout the day without needing to refer.

#### Implication:

Inefficient use of the elections budget

#### (Agreed) Recommendation:

- (i) For future elections a promotions pack will be developed, which can be ordered by candidates, in for order material to be printed as required, thus reducing elections printing costs.
- (ii) The need for Voter ID PSIs for future elections will be reviewed based on the feedback received from the elections in May 2023.

#### Responsible Officer:

Laura Noonan, Electoral Services and Scrutiny Manager

#### Target Date:

31 March 2024

#### 4. Retention of VAC application data

##### **Finding:**

Based on information provided by the Elections Team it was established the VAC application data is being kept longer than the specified 28 day retention period recommended by The Electoral Commission. Currently, data is retained longer than 28 days to allow for weekly updates on the total number of applications received processed, rejected and on hold for further information.

##### **Implication:**

Potential information governance risk in that the Council is retaining elections data longer than the recommended period.

##### **(Agreed) Recommendation:**

The Council will review elections data currently held by the Council to ensure it does not exceed the recommended 28 day period specified by the Electoral Commission. If weekly updates are still required, the Council will investigate whether this data can be obtained directly from Government sources.

##### **Responsible Officer:**

Laura Noonan, Electoral Services and Scrutiny Manager

##### **Target Date:**

31 July 2023

## Limitations inherent to the internal auditor's work

This report has been prepared solely for the Council in accordance with the terms and conditions set out in the terms of reference. Internal audit does not accept or assume any liability of duty of care for any other purpose or to any other party. This report should not be disclosed to any third party, quoted or referred to without prior consent. Internal audit has undertaken this review subject to the limitations outlined below.

### Internal control

- Internal control systems, no matter how well designed and operated, are affected by inherent limitations. These include the possibility of poor judgement in decision making, human error, control processes being deliberately circumvented by employees and others, management overriding controls and the occurrence of unforeseeable circumstances.

### Responsibilities of management and auditors

- It is management's responsibility to develop and maintain sound systems of risk management, internal control and governance for the prevention and detection of irregularities and fraud. Internal audit work should not be seen as a substitute for management's responsibilities for the design and operation of these systems.
- Internal audit endeavours to plan audit work so that it has a reasonable expectation of detecting significant control weakness and if detected, will carry out additional work directed towards identification of consequent fraud or other irregularities. However, internal audit procedures alone, even when carried out with due professional care, do not guarantee that fraud will be detected.
- Accordingly, these examinations by internal auditors should not be relied upon solely to disclose fraud or other irregularities which may exist.

<b>Report distribution:</b>	David Pattison, Chief Operating Officer (FINAL)
	Laura Phillips, Assistant Director for People & Change (FINAL)
	Laura Gittos, Head of Governance
	Laura Noonan, Electoral Services and Scrutiny Manager
<b>Date:</b>	26 June 2023

<b>CITY OF WOLVERHAMPTON COUNCIL</b>	<b>Governance and Ethics Committee</b> 7 September 2023
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<b>Report title</b>	Boundary Commission for England Parliamentary Boundary Review Final Recommendations and Statutory Review of Polling District and Polling Places	
<b>Cabinet member with lead responsibility</b>	Councillor Paula Brookfield	
<b>Accountable director</b>	David Pattison, Chief Operating Officer	
<b>Originating service</b>	Electoral Services	
<b>Accountable employee</b>	Laura Noonan	Electoral Services and Scrutiny Manager
	Tel	01902 55 5050
	Email	Laura.noonan@wolverhampton.gov.uk
<b>Report has been considered by</b>	Election Board	31 August 2023

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**Recommendation for action or decision:**

The Governance and Ethics Committee is recommended to:

1. Approve the plans and timetable for a statutory review of polling districts and polling places within Wolverhampton.

**Recommendations for noting:**

The Governance and Ethics Committee is asked to note:

1. The outcome of the Boundary Commission for England Parliamentary Boundary Review Final Recommendations.

## **1.0 Purpose**

- 1.1 To provide an update on the new parliamentary constituency boundaries.
- 1.2 To present the plans and timetable for the statutory review of polling districts and polling places.

## **2.0 Background**

- 2.1 Under the Representation of the People Act 1983, the council has a duty to divide its area into polling districts and to designate a polling place for each district. The following definitions may be useful when reading the report:
  - Polling districts are geographical electoral areas into which wards and constituencies may be sub-divided.
  - Polling places are the buildings or areas designated by the council where electors in a polling district go to vote in person.
  - Polling stations are the number of issuing desks in the building or area that is the designated polling place.
- 2.2 The Electoral Administration Act 2006, as amended, introduced a duty on all local authorities in Great Britain to review their polling districts and polling places at least once every five years.
- 2.3 Under section 18C of the Representation of the People Act 1983, the next compulsory review must be undertaken within a 16-month window between 1 October 2023 and 31 January 2025.
- 2.4 The intention of the legislation was reviews would be completed by the January before a UK parliamentary general election. However, since the repeal of the Fixed Term Parliaments Act 2011, there is no longer any certainty as to when the next general election will be.
- 2.5 The Dissolution and Calling of Parliament Act 2022 means:
  - the UK Parliament can be dissolved by the King on request of the Prime Minister, at any time within the 5 years of the life of the Parliament.
  - the next general election must take place before Tuesday 28 January 2025, but it could happen at any point before then.
  - there is no longer a link between the timing of the compulsory polling district and places review falling in a 16-month period ending 3 months before a scheduled general election.
- 2.6 In addition, the Boundary Commission for England is currently undertaking a review of parliamentary constituency boundaries. The Commission has now published its final recommendations, and Orders for the new parliamentary constituency boundaries will be made by 1 November 2023.

- 2.7 Once the Orders for new parliamentary constituencies have been made, the new boundaries will be used for the next general election.
- 2.8 If a parliamentary by election is called in the meantime, it would be run on existing boundaries.
- 2.9 These issues mean it is important that the polling district and places review is carried out as early as possible, so that Wolverhampton has agreed polling districts and places to be used for the next parliamentary election, as well as the scheduled local elections, Combined Authority Mayoral and Police and Crime Commissioner elections in May 2024.
- 2.10 Wolverhampton conducted an interim polling district and polling place review following the local government boundary review in 2022. The opportunity was taken to align these polling districts to the proposed parliamentary constituencies to assist with the risk of a snap parliamentary election.
- 2.11 The designation of polling districts and places is a function of Full Council. Full Council has delegated the authority to the Returning Officer to make any necessary changes to polling places and stations, in consultation with the Leader and Leader of the Opposition.

### 3.0 Parliamentary Constituencies

- 3.1 The Boundary Commission for England recently undertook a review of parliamentary constituency boundaries. They have published their final recommendations which can be found in Appendix 1. Further information can be found on the boundary commission website.
- 3.2 The final recommendations for the three Wolverhampton constituencies have not changed since the initial proposals. The Returning Officer had responded at each stage of the consultation process with requests to place whole local government wards in constituencies. A map to show the wards and constituencies can be found in Appendix 2. The table below provides a summary of the wards in each constituency and the changes compared to the existing constituency:

Constituency	Wards in constituency	Changes from existing constituency
Wolverhampton North East	<ol style="list-style-type: none"><li>1. Bushbury North (part)</li><li>2. Bushbury South and Low Hill</li><li>3. Fallings Park</li><li>4. Heath Town</li><li>5. Oxley (part)</li><li>6. Short Heath</li><li>7. St Peters (part)</li><li>8. Wednesfield North</li><li>9. Wednesfield South</li></ol>	<ul style="list-style-type: none"><li>• Taking in 2 wards from Walsall (Willenhall North and Short Heath)</li><li>• Part of Oxley moving to Wolverhampton West.</li><li>• Part of St Peters now in this constituency.</li></ul>

	10. Willenhall North	
Wolverhampton South East	<ol style="list-style-type: none"> <li>1. Bentley and Darlaston North</li> <li>2. Bilston North</li> <li>3. Bilston South</li> <li>4. Darlaston South</li> <li>5. East Park</li> <li>6. Ettingshall North</li> <li>7. Ettingshall South and Spring Vale</li> <li>8. St Peters (part)</li> <li>9. Willenhall South</li> </ol>	<ul style="list-style-type: none"> <li>• Taking in 3 wards from Walsall (Willenhall South, Bentley and Darlaston South and Darlaston South)</li> <li>• Blakenhall moving to Wolverhampton West</li> <li>• Part of St Peters now in this constituency.</li> </ul>
Wolverhampton West	<ol style="list-style-type: none"> <li>1. Blakenhall</li> <li>2. Bushbury North (part)</li> <li>3. Graiseley</li> <li>4. Merry Hill</li> <li>5. Oxley (part)</li> <li>6. Park</li> <li>7. Penn</li> <li>8. St Peters (part)</li> <li>9. Tettenhall Regis</li> <li>10. Tettenhall Wightwick</li> </ol>	<ul style="list-style-type: none"> <li>• Name change from Wolverhampton South West</li> <li>• Taking in part of Oxley from Wolverhampton North East</li> <li>• Taking in Blakenhall from Wolverhampton South East</li> <li>• Part of St Peters now in this constituency.</li> </ul>

3.3 Once the Orders for new parliamentary constituencies have been made, the new boundaries will be used for the next general election. If a parliamentary by election is called in the meantime, it would be run on existing boundaries.

3.4 This means the Register of Electors needs to be able to reflect both the existing and new constituencies. Work can be done to prepare the register in the background before then, so that once the Order for the new parliamentary constituencies is made, the register can be re-arranged or adapted as necessary to give effect to the Order. This would allow any snap general election in November 2023 to be run on the new constituencies. This can be achieved by creating future administrative areas within the Election Management System. The Electoral Services and Scrutiny Manager, on behalf of the Electoral Registration Officer, will liaise with the software supplier to implement this. This work can be started once the final parliamentary constituency proposals are published.



#### 4.0 Polling district and places review timetable

4.1 It is important to complete the review as soon as possible so they can be used in the next elections. Section 18C of the Representation of the People Act 1983 does not allow the formal review process to commence before 1 October 2023. The proposed timetable for the review has been presented below:

Activity	Date
Conduct preliminary review inviting feedback from councillors and prepare schedule of polling districts and places for consultation	August 2023 – September 2023
Publish a notice of the holding of the review	2 October 2023
Publish ARO representation	2 October 2023
Public consultation period	2 October 2023–29 October 2023
Analyse responses and prepare recommendations	30 October 2023 – 10 November 2023
Governance and Ethics Committee to consider representations and make recommendations to Full Council	23 November 2023
Full Council to consider recommendations from Governance and Ethics Committee	6 December 2023
Amend the electoral software to reflect new polling district and place scheme	December 2023
Publish revised register with new polling districts	2 January 2024

#### 5.0 Polling district and places review process

##### 5.1 *Legal requirements*

The process for a polling district and places review is set out in Schedule A1, Representation of the People Act 1983.

The Council must:

- publish a notice of the holding of a review
- consult the (Acting) Returning Officer ((A)RO) for every parliamentary constituency which is wholly or partly in its area
- publish all representations made by an (A)RO within 30 days of receipt by posting a copy of them at the local authority's office and in at least one conspicuous place in their area and, if the authority maintains a website, by placing a copy on the authority's website

- seek representations from such persons as it thinks have particular expertise in relation to access to premises or facilities for persons who have different forms of disability. Such persons must have an opportunity to make representations and to comment on the representations made by the (A)RO(s).

On completion of the review, the council must give reasons for its decisions and publish:

- all correspondence sent to an (A)RO in connection with the review
- all correspondence sent to any person whom the authority thinks has particular expertise in relation to access to premises or facilities for persons who have different forms of disability
- all representations made by any person in connection with the review
- the minutes of any meeting held by the council to consider any revision to the designation of polling districts or polling places within its area as a result of the review
- details of the designation of polling districts and polling places within the local authority area as a result of the review
- details of the places where the results of the review have been published

## 5.2 ***Preparatory work and informal consultation***

Even though the formal review cannot start until 2 October 2023, there is a range of preparatory activity which Electoral Services are already carrying out:

This includes:

- Understanding the impact of the new parliamentary constituencies
- Contacting Returning Officer and Electoral Services Team at Walsall Council regarding parliamentary constituencies.
- Liaising with electoral software supplier about structuring the electoral register to accommodate boundary changes
- Preparing data for the start of the review (electorate figures, turnout from previous elections, information about new housing developments in the next 5 years)
- Obtaining detailed up to date maps to enable accurate designation of polling district boundaries
- Identifying organisations with a special interest/expertise in disabled access to consult
- Reviewing polling station feedback from the May 2023 local elections
- Identifying potential alternative polling stations where appropriate
- Seeking feedback from councillors on existing arrangements.

## 5.3 Implementing the changes

Due to a by-election taking place during the canvass period, the publication of the revised register will be delayed until 2 January 2024. This also enables any polling district changes to be implemented on this register. All recipients entitled to request and receive the annual revised register will be notified of the delay in advance.

## **6.0 Financial implications**

- 6.1 The statutory review of polling districts and polling places will be met within the existing Electoral Registration budget.
- 6.2 Any additional costs incurred in a Parliamentary Election as a result of changes to wards will be resourced by Election Grant provided by Central Government for every Parliamentary Election.

[LD/16082023/J]

## **7.0 Legal implications**

- 7.1 All recommendations arising from the report are in line with the statutory provisions covering the review of polling districts and polling places.

SZ/01082023/P

## **8.0 Equalities implications**

- 8.1 Local authorities have a duty to review the accessibility of all polling places to disabled voters and ensure that every polling place, and prospective polling place, for which it is responsible is accessible to disabled voters 'so far as is reasonable and practicable'. Any proposed alternatives to polling stations will be assessed for accessibility before being recommended.
- 8.2 Groups and individuals with experience in disability within Wolverhampton will be invited to respond during the public consultation phase.

## **9.0 All other Implications**

- 9.1 There are no other implications arising from this report at the current time.

## **10.0 Appendices**

- 10.1 Appendix 1: Boundary Commission for England – The 2023 Review of Parliamentary Constituency Boundaries in England.
- 10.2 Appendix 2: A map to show Wolverhampton Wards and the Parliamentary Constituencies.

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Boundary Commission for England

# The 2023 Review of Parliamentary constituency boundaries in England

Volume one: Report

Boundary Commission for England

The 2023 Review of  
Parliamentary constituency  
boundaries in England

Presented to Parliament pursuant  
to Section 3 of the Parliamentary  
Constituencies Act 1986, as amended



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# Foreword

I became the Deputy Chair of the Boundary Commission for England in June 2020.

The Report that follows is the culmination of over two years of hard work since the review commenced in January 2021. In this report we set out our final recommendations for Parliamentary constituencies in each of the nine regions in England.

As we detail in the first chapter, there are some legal requirements to which the Commission must work. The English constituencies that we propose must be within 5% of the electoral quota. This means that the number of registered Parliamentary electors on the electoral roll for each constituency in England must be between 69,724 and 77,062. In England there are two exceptions: the Isle of Wight by law must have two (whole) constituencies. Otherwise, our recommended constituencies must satisfy this requirement across England.

In formulating patterns of constituencies across England, we inevitably have to make choices. Parliament has set out a number of factors that we may take into account when formulating our recommendations. These are outlined in more detail in the first chapter, but include geographical considerations, boundaries of existing constituencies and local ties. As you would expect, we received many differing views on these factors.

The process set out by Parliament also requires the Commission to undertake public consultations. During the course of the 2023 Review, we held three statutory public consultations, in response to which we received over 60,000 representations in total. We are grateful to all those who participated. Many of those who responded provided thoughtful views on the make-up of constituencies across England and at a local level, including whether our proposals best reflected the statutory factors, and, in some cases, suggesting alternative patterns of constituencies. It is not unusual for some of those responses to be contradictory, particularly when expressing personal views on local ties. We have taken into account all the representations received, but it has not always been possible to incorporate them into our final recommendations because of the other statutory factors.

As we set out in the first chapter, the Commission is an independent and impartial body. While political parties and Members of Parliament do submit representations to the Commission, we consider all representations based on the evidence received and have no regard to the political advantages or disadvantages of our recommendations.

Parliamentary constituency boundary reviews will now take place every eight years (instead of every five years). We have therefore thought it helpful to outline some administrative learning points from the 2023 Review. As we detail, we particularly welcomed the changes in the legislation by Parliament in 2020, which allowed the Commission to convene public hearings in the secondary consultation. We considered that this enabled both better targeting of where to hold public hearings, and more informed participation in them.

The members of the Commission extend profound thanks and gratitude to the Commission Secretariat (led by our Secretary, Tim Bowden, his Deputy Secretary and the Head of Corporate Services) and to our Assistant Commissioners. Part of the 2023 Review took place during the challenging period of the Coronavirus pandemic. We are grateful for everyone's dedication, hard work, skill and resilience demonstrated throughout the review. Finally, I would personally like to thank my fellow Commissioners,

Colin Byrne and Sarah Hamilton. They have brought a wealth of experience and dedication to the review, for which I am most grateful.

A handwritten signature in black ink, appearing to read 'The Hon. Mr Justice Lane', written in a cursive style.

The Hon. Mr Justice Lane

# The administration of the 2023 Review

## Legislative framework and source data

1. The Boundary Commission for England (BCE) is an independent and impartial advisory non-departmental public body, established under the Parliamentary Constituencies Act 1986 ('the Act') to keep under review Parliamentary constituency boundaries in England. Similar Commissions conduct equivalent work in Northern Ireland, Scotland and Wales. The members of the BCE and other key positions are listed at Appendix A.
2. The statutory rules governing the conduct of our work are contained within the Act (as amended). These rules require a review of all UK Parliamentary constituencies to be conducted every eight years, with a report and recommendations submitted to the Speaker of the House of Commons at the end of the review, detailing the extent, name and designation of all constituencies in that Commission's area. 'Designation' in this context means whether the constituency should be a 'county constituency' or a 'borough constituency'.
3. The statutory rules establish a fixed number of 650 constituencies (the same as the existing number of constituencies) for the UK, from which elections are to be held for the House of Commons. From this total, five constituencies (two in Scotland, one in Wales and two for the Isle of Wight) are 'protected', in the sense that they are reserved for the specified areas and thereby not subject to some of the criteria and statistical calculations applied to all other constituencies (in particular as regards electorate size).

## The electorate for the 2023 Review

4. For a given review, the Act specifies a UK electorate figure at a particular point in time that is to be used throughout that review. For the 2023 Review this is the figure from the register of Parliamentary electors on 2 March 2020. This data was consolidated by the Office for National Statistics and published.

## Distribution of constituencies across the UK

5. The legislation then specifies a mathematical formula (set out in Schedule 2 to the Act and referred to as the Sainte-Laguë formula) to determine how the 645 unprotected constituencies are allocated to each part of the UK for a given review, taking into account the relative sizes of the respective Parliamentary electorates of each part of the UK (not including the electorates of the five protected constituencies). The statutory distribution formula applied to the electorate figures for the 2023 Review resulted in the following allocation:

Part of the UK	Constituencies allocated
England	541 (+2 Isle of Wight)
Northern Ireland	18
Scotland	55 (+2 protected constituencies)
Wales	31 (+1 protected constituency)
<b>Total United Kingdom</b>	<b>645 (+5 protected constituencies)</b>

### The electoral quota and the permitted electorate range

- The legislation requires all recommended unprotected constituencies to be broadly similar in electorate size. Specifically, they must all be within 5% of an ‘electoral quota’ figure, which is the mean average Parliamentary electorate for the 645 unprotected constituencies. We refer to this as the ‘permitted electorate range’. Using the 2023 Review electorate data, the **electoral quota figure is 73,393**, meaning the permitted electorate range for this review is between **69,724 (minimum) and 77,062 (maximum)**.

### Local government boundaries

- Where the Commissions wish to take account of local government boundaries (see statutory factors in the BCE policies section below), the Act says we may take into account such boundaries as they existed – or were in prospect – at a specified point in time. **For the 2023 Review, the local government boundaries are those that existed or – where relevant – were in prospect (due to being made by an as yet unimplemented Order) as at 1 December 2020.** Volume 2 of this report lists those council areas that had prospective boundaries on the operative date.

### Geographical size of constituencies

- The Act also requires all unprotected constituencies to be no larger than 13,000 square kilometres in size (except in prescribed circumstances). In England, this is not a concern, as even in its most sparsely populated areas constituency sizes do not come near this figure.

### Requirements for public consultation

- The legislation for the 2023 Review required the Commissions to conduct an eight-week public consultation on its initial proposals. We were required to display hard-copy materials in each proposed constituency and publicise the consultation period.
- All comments received during the initial consultation had subsequently to be published, and people given an opportunity to comment on those responses during a six-week public consultation period. During that consultation, we were also required to hold public hearings. In England, the legislation requires between two and five public hearings to be held in each of the nine English regions.
- Where Commissions revise their proposals in light of comments from the first two consultations, those revised proposals then had to be published and a final four-week public consultation conducted on them.

12. Detailed information on how we complied with the consultation requirements – and actively sought to inform and engage the public in the consultations – is set out later in the report.

## **BCE policies**

13. Within the mandatory legislative framework set out above, there are a number of key issues on which the Commissions have discretion to determine their own policies.

### **Sub-division of England into nine administrative regions**

14. A key preliminary question before detailed work commenced was whether – from the outset – we should seek to contain constituencies within regional boundaries. Freely allowing constituencies to straddle regional boundaries would provide maximum flexibility, but might often be considered undesirable in terms of local community identity and the administration of elections in those constituencies, as it would inherently disregard local authority boundaries. We conducted a public consultation on this question in 2011, to which the overwhelming response was to support a general policy of working within regional boundaries in developing our proposals. For the 2018 Review, we adopted the same general policy and, during the 2023 Review, this approach was again overwhelmingly supported by respondents to the three public consultations.
15. Therefore, for the 2023 Review, we adopted the same general policy of working within the nine regional boundaries. We stated clearly – before any public consultation in this review – that this approach did not prevent anyone from putting forward counter proposals that included one or more constituencies being split between regions, but that very compelling reasons would need to be given to persuade us to depart from the general policy.
16. Having established that we would work within the nine regions, we then needed to distribute England’s allocation of 541 constituencies (plus the two protected constituencies) fairly between those regions. A further application of the Sainte-Laguë distribution formula – this time using only England figures – seemed to us the fairest approach. Again, such an approach was consulted on in 2011 and had been overwhelmingly supported both during that review and the 2018 Review.

### **Taking account of the statutory factors**

17. The legislation specifies a number of factors that a Commission ‘may take into account, if and to such extent as they think fit’, in developing proposals. Unlike consideration of geographical or electorate size, these are not mandatory requirements, but their explicit presence in the legislation leads the BCE to seek to have regard to them as far as possible (although in many instances the separate factors will lend themselves to differing options in the same area). The factors relevant to the 2023 Review are:
  - **Special geographical considerations, including in particular the size, shape and accessibility of a constituency:** We consider that the special geographical considerations that may have an impact on the ability to form a constituency with an electorate within the permitted electorate range will primarily relate to physical geography such as mountains, hills, lakes, rivers, estuaries or islands rather than to human or social geography. Matters of culture, history, socio-economics and other possible aspects of non-physical geography are more likely to arise as issues when considering the separate factor of ‘local ties’ (below).

- **Local government boundaries:** As noted above, this specifically relates to the boundaries as they existed or were in prospect on 1 December 2020. Such boundaries include both the external boundaries of local councils and their internal – ward or electoral division – boundaries. Our policy has been to identify constituencies by reference to local authority external boundaries as far as practicable, but it has nevertheless often proved necessary to cross these boundaries in order to form constituencies that comply with the permitted electorate range. Our particular policy in relation to the use of wards/electoral divisions is discussed further below.
- **Boundaries of existing constituencies:** We have sought to have regard to existing constituencies as far as possible, as we have not considered that it would be appropriate to start from a blank sheet of paper. However, the existing constituencies vary markedly in the size of their electorates. The mandatory requirement to keep within 5% of the electoral quota, and the substantial change in the number of constituencies across the country, mean that the scope for following existing constituency boundaries has been limited. Furthermore, it has been important to be clear that an existing constituency could not automatically be considered protected from change, simply on the basis of its electorate figure already falling within the permitted range: many such constituencies have needed to be altered, to allow for the creation of viable constituencies in the surrounding area.
- **Any local ties that would be broken by changes in constituencies:** We very much recognise that this factor resonates strongly with the general public. It is also the factor for which we have drawn most heavily on the evidence from consultation responses as to the exact nature of such local ties and of their impact.
- **The inconveniences attendant on such changes:** We broadly consider this factor alongside the boundaries of existing constituencies, as they are to some extent both considerations about changes to the existing pattern. As outlined above, the mandatory requirement to keep within 5% of the electoral quota means that substantial changes are likely to constituencies across the country.

### Using the full permitted electorate range

18. Legislation does not require the Commissions to achieve constituency electorates that are as close as possible to the electoral quota figure, and we do not consider it appropriate to adopt such a policy objective. To do so would undermine our ability to properly take into account the other statutory factors mentioned above. Accordingly, by way of illustration, we have preferred to recommend a constituency that has, say, a 4% variance from the electoral quota, but which respects local ties, in preference to an alternative that would produce a constituency with only a 1% variance, but which would split communities.

### Policy on wards

19. The BCE uses wards (in district and borough council areas) or electoral divisions (in areas of unitary authorities that have a county status) as the basic building block for designing constituencies. The use of the term ‘ward’ throughout the rest of this report should be taken to include electoral divisions in unitary authorities.

20. The BCE's long-standing policy is to avoid splitting a ward between constituencies unless there is an exceptional and compelling reason for doing so. Wards are well-defined and well-understood units, which are generally indicative of areas that share a broad community of interest. Any division of these units between constituencies would be likely to break local ties, disrupt political party organisations, and cause difficulties for electoral registration and returning officers. Our view is, therefore, that wards should continue to be the default building block for constituencies.
21. However, we recognise that, in a limited number of cases, there may be exceptional and compelling circumstances – particularly having regard to the specified statutory factors mentioned above – that may make it appropriate to split a ward. Strong evidence and justification need to be provided in any constituency scheme that proposes splitting a ward, and examples of circumstances in which we have considered splitting a ward to be appropriate include: a) where splitting a ward would significantly enhance the ability of the BCE to adhere to existing or prospective local authority boundaries (as defined in the Act), maintain existing constituencies unchanged, and/or preserve local ties, without causing consequential significant problems for surrounding constituencies; or b) where splitting a single ward may prevent a significant 'domino effect' of otherwise unnecessary change to a chain of constituencies in order to meet the permitted electorate range requirement; or c) where the division of a ward would avoid other unacceptable outcomes forced by local geographical factors. Where we have found the need to split a ward, we have nevertheless generally sought to do so along the existing administrative boundaries of the polling districts that form part of that ward. Overall, we still believe that the number of such split wards should be kept to the smallest number possible, but are nevertheless recommending 50 split wards across England, where we feel a sufficiently strong justification exists.
22. As far as possible, we have sought to create constituencies: a) from wards that are adjacent to each other; and b) that do not contain 'detached parts', i.e. where the only physical connection between one part of the constituency and the remainder would require travel through a different constituency.

#### **Factors we do not consider**

23. There are a number of matters that we specifically do not take into account when looking at constituency boundaries. In particular, these are:
  - **Voting patterns and support for political parties:** As an independent and impartial body, we emphasise very strongly that existing voting patterns and the prospective fortunes of political parties should not and do not enter our considerations during a review. Unlike the following issues, there is no nuance to this: we do not collect information on voting patterns, and we conduct our work without any consideration as to what implications our proposals may have on the fortunes of particular political parties or individual politicians.
  - **Changes to local government boundaries after the specified statutory date:** The local government boundaries that we may take into account in the 2023 Review are – as stated previously – those that existed or were in prospect on 1 December 2020. Consequently, we have not generally taken into account new boundaries that may have come into effect at local council elections after this date. However, in the limited circumstances where we have decided to split a ward (as it existed or was in prospect on 1 December 2020) between



constituencies in order to meet the statutory electorate range, in considering how it should be split, we have sought to take into account as appropriate any new ward boundaries introduced after 1 December 2020.

- **Changes to electorates after the specified statutory date:** We are required to work on the basis of the numbers of electors on the electoral registers on 2 March 2020. As such, we cannot take account of claims of under-registration or any later changes to the number of electors in some areas.

### **Naming and designating constituencies**

24. In making our recommendations, we are required by the legislation to specify a name and designation for each proposed constituency, but there is no statutory guidance on these points.
25. Our policy on the naming of constituencies is that, where recommended constituencies remain largely unchanged, the existing constituency name should usually be retained. In such cases constituency names are likely to be altered only where there is good reason for change or there is strong local support for an alternative name.
26. Where a new name is justified, our general policy has been that the name should normally reflect the main population centre(s) contained in the constituency. Where a new constituency is split between two or more local authorities, the name will generally relate primarily to the majority area, but we also seek to give some recognition in the name to the minority area (particularly where it consists of more than one ward). However, this is not always practicable.
27. We adopt compass point names when there does not appear to be an obviously more suitable name. The compass point reference used generally forms a prefix in cases where the rest of the constituency name refers to the county area or a local council, but a suffix where the rest of the name refers to a population centre.
28. We have been conscious of the desirability of constituency names being shorter rather than longer. However, this has not always been achievable as respondents have sought to lengthen constituency names in order to make them more reflective of the areas represented.
29. Notwithstanding the above, where a suitable alternative name is proposed that generally commands greater support locally than what we may have initially proposed, we have usually been able to recommend that alternative.
30. In designating constituencies, our policy is that, as a general principle, where constituencies contain more than a small rural element, they should normally be designated as county constituencies. In other cases they should be designated as borough constituencies. The designation is suffixed to the constituency name and is usually abbreviated: BC for borough constituency and CC for county constituency.

## **Progression of the 2023 Review**

### **The first review since 2018**

31. Although the Commissions commenced working under the new rules immediately after the legislation was enacted in 2011 (in what we refer to as the ‘2013 Review’), subsequent

amendment of the legislation in early 2013 effectively required all the Commissions to abandon that work and restart in 2016, with a view to making their final recommendations in September 2018. Therefore, we refer to the latter review as the 2018 Review. In December 2020 the legislation was changed again, including the provision to retain the existing number of constituencies in the UK at 650. Therefore, by default it would not be possible to implement the recommendations of the completed 2018 Review, as they were based on a reduction of the number of constituencies to 600, as was then required. As the current legislation requires that each Commission submit its final recommendations to the Speaker of the House of Commons before 1 July 2023, we therefore refer to the current review as the ‘2023 Review’, and consider it the first review since the enactment of the new rules in 2020.

**Establishing and publishing the local government boundaries dataset**

- 32. The legislation provides for local government boundaries as they existed or were in prospect on 1 December 2020 to be those of which we may take account in our review work. These were established by taking a snapshot of the relevant boundaries as they are officially mapped by Ordnance Survey (OS) in its Boundary-Line product and copies of prospective local government boundaries as provided by the (separate) Local Government Boundary Commission for England.

**Establishing the Parliamentary electorate dataset, calculation of the distribution of constituencies and formal launch of the 2023 Review**

- 33. The aggregate Parliamentary electorate figures for the UK for the 2023 Review – and subsequent distribution of constituencies between the four parts of the UK using the statutory Sainte-Laguë formula – were as follows:

	<b>Electorate*</b>	<b>Constituencies allocated</b>
England	39,748,705	541 (+2)
Scotland	4,023,611	55 (+2)
Wales	2,270,262	31 (+1)
Northern Ireland	1,295,688	18
<b>Total United Kingdom</b>	<b>47,338,266</b>	<b>645 (+5)</b>

\*The electorates of the five protected constituencies are not included in the figures.

Applying the Sainte-Laguë distribution formula to the England-only data resulted in the following allocation across England:

<b>Region</b>	<b>Electorate*</b>	<b>Constituencies allocated</b>
East Midlands	3,481,126	47
Eastern	4,482,127	61
London	5,550,454	75
North East	1,952,999	27
North West	5,381,549	73
South East	6,522,802*	89 (+2)
South West	4,242,136	58
West Midlands	4,169,012	57
Yorkshire and the Humber	3,966,500	54
<b>Total England</b>	<b>39,748,705*</b>	<b>541 (+2)</b>

\*Excludes electorate of the Isle of Wight.

34. Although we were able to determine the total electorate figures (and therefore make the overarching calculations detailed above) without significant difficulty, we did experience significant issues in finalising the precise ward-level electorate figures for each local authority. This was because of a dislocation – for the 2023 Review – between the operative date for the elector numbers (2 March 2020) and that for the boundaries of the wards within which those electors sit (1 December 2020). This was further compounded by the new legislative provision that ‘prospective’ ward boundaries should be used for the review, rather than outgoing ward boundaries: again this needs to be by reference to a specific operative date (wards are ‘prospective’ if the legal Order for them was made by 1 December 2020), but reviews of – and changes to – local government wards are a rolling and ongoing process that takes no account of a Parliamentary constituencies review. Particularly in London, this cut-off date fell in the middle of a sequence of Orders being made for new wards in London boroughs, meaning that for some boroughs we had to acquire figures associated with incoming prospective wards, while for others we had to use figures associated with outgoing wards. Ensuring that we received the correct dataset for each authority, and that those figures were accurate, notwithstanding the complex requirements for generating them, was a lengthy and intricate process.

#### **Development of initial proposals, recruitment of Assistant Commissioners and logistical planning for the initial consultation**

35. As soon as the numbers of constituencies for each region were established, we commenced work drawing up and analysing multiple different options for how constituencies might best be changed (where necessary) to ensure an optimal scheme in every area that complied with the statutory factors. After consulting with the qualifying political parties, we also published, in May 2021, our ‘Guide to the 2023 Review’, which sought to set out clearly in one place the statutory requirements for the review, what our own policies in relation to it were, and how, when and where

the review would progress. This was one of the first significant steps intended to both aid the general public's understanding of the 2023 Review, and support and encourage their informed engagement with the later consultation stages of the process.

36. In parallel with this substantive work, the secretariat made the administrative arrangements for the printing of the initial proposals reports and maps, distribution of those to the statutory places of public deposit in each proposed constituency, and the distribution of bespoke initial proposals packs to all MPs representing current English constituencies. We also undertook significant work to procure, build and test an online consultation portal service – through which the public could interact with our proposals and easily submit representations.
37. Also during this period, we ran an open recruitment competition to have suitable individuals appointed to assist us in our task. 'Assistant Commissioners' play a key role through the middle stages of the review in chairing public hearings, analysing representations received, and making proposals to us for revisions. A key reason for being supported by the Assistant Commissioners during the middle stages of the review is that they are not part of the formulation of the initial proposals. We sought to fill 18 positions, and received 219 applications, conducting 46 interviews. Following our recommendation of names to the appropriate Minister, 18 Assistant Commissioners were appointed for 12-month terms of office running from 1 October 2021. We allocated two Assistant Commissioners to each of the nine regions.
38. In each region, one of the Assistant Commissioners was identified as the lead Assistant Commissioner. During the course of the review two Assistant Commissioners resigned due to other commitments. We therefore finished the review with 16 Assistant Commissioners, of whom two worked on two regions.

### **Consultation on the initial proposals**

39. Our initial proposals were published on 8 June 2021, and we ran a public consultation on them for the statutory eight-week period, with the last date for receipt of responses being 2 August 2021. We undertook a significant range of communications activities to promote public awareness and understanding of the consultation, and to encourage engagement. In addition to the statutory requirement to place initial proposals in a public place of deposit in each proposed constituency, these communications activities included national press adverts, a national and local media briefing session, supported by a national and local media news release, spokesperson interviews on national and local media outlets, and audience-specific digital advertising on websites and popular social media applications.
40. By the end of the initial proposals consultation period, we had received 34,441 individual representations (including a number of petitions and letter-writing campaigns) via our consultation website, email, and hard-copy letter.

### **Collation of material for secondary consultation**

41. Following the close of the consultation on the initial proposals, all of the responses were prepared for publication, as required by the legislation. During this period, logistical arrangements were made for the public hearings to be convened during the secondary consultation.

### Secondary consultation on responses to initial proposals

42. We published all the responses to the initial proposals on 7 February 2022, in order to allow those who might have wished to make an oral representation at a public hearing time to consider the responses received. On 22 February 2022 we commenced the statutory six-week period for consultation on those responses, which subsequently closed on 4 April 2022.
43. We supported this consultation period with a news release to national and local media, and further audience-specific advertising on websites and social media.
44. In line with the legislative requirements, we also ran between two and five public hearings in each region of England during the statutory consultation period. Public hearings were chaired by Assistant Commissioners and were held in the following locations:

Region	Public hearing locations
East Midlands	Nottingham, Leicester, Northampton
Eastern	Cambridge, Southend, Ipswich
London	Westminster, Havering, Ealing, Merton, Bromley
North East	Newcastle, Middlesbrough
North West	Manchester, Liverpool, Chester, Preston, Kendal
South East	Crawley, Portsmouth, Reading, Ashford
South West	Exeter, Gloucester, Bath, Dorchester
West Midlands	Birmingham, Stafford, Worcester
Yorkshire and the Humber	Leeds, Hull, Northallerton

45. During this consultation we received 11,509 individual representations (again including a number of petitions and letter-writing campaigns) via our consultation website, email and hard-copy letter, and from those who made oral representations at public hearings.

### Analysis of responses, development of revised proposals and planning for revised consultation

46. Following the end of the secondary consultation period, all of the 45,950 responses from the initial and the secondary consultations were brought together for each area and assessed in detail by the Assistant Commissioners and review staff for the relevant region. This work included mapping out counter proposals that had been put forward by respondents (including considering how any unspecified consequential effects on surrounding areas might best be accommodated), and visiting any areas around the country that had proved particularly complex or controversial. Our Assistant Commissioners then considered all the representations received, the counter proposals put forward, and any further solutions that would reflect the local communities while remaining within the numerical constraints of the legislation, and made recommendations to the Commission on what revisions to make to the initial proposals.
47. Also during this period, the secretariat made the administrative arrangements for the printing of the revised proposals reports and maps, distribution of those to the statutory places of public

deposit in each proposed constituency, and the distribution of bespoke revised proposals packs to all MPs representing current English constituencies.

### **Consultation on the revised proposals**

48. Our revised proposals were published on 8 November 2022, and we ran a public consultation on them for the statutory four-week period, with the last date for receipt of responses being 5 December 2022. We again undertook a full range of communications activities to promote public awareness and understanding of the consultation, and to encourage engagement. In addition to the statutory requirement to place revised proposals in a public place of deposit in each proposed constituency, these communications activities again included national press adverts, a national and local media briefing session, supported by a national and local media news release, spokesperson interviews on national and local media outlets, and audience-specific digital advertising on websites and popular social media applications.
49. By the end of the revised proposals consultation period, we had received 18,890 individual representations (again including a number of petitions and letter-writing campaigns) via our consultation website, email and hard-copy letter.

### **Development of final recommendations and drafting of final report**

50. Following the close of this final consultation, individual Commissioners worked with the secretariat to analyse in detail the evidence in the responses, and assess whether any final adjustments would be appropriate. The Commission as a whole then considered this analysis and advice, and decided on any final amendments to be made.
51. The text of this final report and the associated illustrative maps were then prepared, ready for submission to the Speaker of the House of Commons before 1 July 2023, as prescribed by the legislation.

### **Administrative learning from the 2023 Review and wider issues**

52. Through the course of preparing for and delivering the 2023 Review, we have identified a number of administrative aspects where we believe that our experience has been particularly positive (thus the continuation of these should be considered at the next review), or where improvements to the current process could be usefully made, which may provide better value for public money and improve the process overall. Where it is within our powers to implement these improvements we will do so, but some may require Parliament considering changes to the legislation that governs our work.

### **Public hearings**

53. As previously outlined, Parliament decided to change the consultation period during which public hearings were convened. For the 2023 Review, the hearings were held in the secondary consultation period (previously they were held in the initial consultation period). We considered that this was an improvement to the process, particularly as participants were better informed of the views of other respondents. Therefore, at the public hearings, respondents were able to set out their views on our initial proposals and any views they wished to express on the

representations of others. We considered this added value in terms of supporting our Assistant Commissioners to form a better understanding of counter proposals received.

54. We would like to make one further suggestion that we consider might increase participation in future public hearings. At present, the legislation requires public hearings to be held in person. We would welcome the ability to have more flexibility in approach, particularly the ability to deliver hybrid public hearings; for example, an in-person and online hearing convened at the same time. We recognise that this might bring some technical challenges, although we consider that these could be overcome, particularly as many people are now more accustomed to using online meeting platforms following the Coronavirus pandemic. Our view is that a hybrid approach would be a more effective use of public money as it may require fewer in-person hearings to be convened and may further improve accessibility of, and encourage participation in, hearings, particularly from those at work, or with caring commitments or mobility issues.

### **Communications and use of technology**

55. As the Commission did during the 2018 Review, we have sought to build on the success of making best use of technology, particularly in the use of an online consultation portal and digital communication methods.
56. To facilitate the public consultation process, we procured the provision of a web-based consultation tool, which combined a public-facing interactive mapping and consultation response facility with a backend database to support consultation response analysis. The front-facing interactive map provided a user-friendly interface where an individual could explore our proposals (both initial and revised) and seamlessly submit their comments to us on those; then subsequently be able to see the comments that others had provided in earlier stages of the consultation. The system was designed to make the collation and sorting of responses much easier and more efficient, which in turn made for a much improved experience for both the public at the secondary consultation stage when searching for particular kinds of responses that had been submitted by others, and for the secretariat in facilitating the analysis of so many responses throughout the review.
57. During the 2018 Review the Commission had managed to receive approximately 90% of its written responses directly through the online consultation portal (it had a target of 70%). We therefore had a similar ambition. In comparison to the 2018 Review, during the 2023 Review we received nearly double the amount of representations in total, with almost 92% of these being received directly through the online consultation portal. We again consider that this has proved successful and demonstrates that the public were able to easily engage in the online system and that it was the preferred choice of engagement compared with either email or hard-copy letter. While technology continues to develop at pace, we would suggest that a similar system be used at future reviews.
58. To assist those who were interested in developing patterns of constituencies across larger areas, we published our proposals in geographic information software format. We consider the same practice should be adopted in the future.
59. A recommendation of the 2018 Review was that the Commission should continue to build on the success of using online and social media advertising as part of any strategy in raising awareness of the 2023 Review. We followed this recommendation and considered that it was effective in

promoting awareness of the review and public consultations, providing relatively good value for money. Based on the evaluations of our communication strategy, we would propose a similar approach be adopted at future reviews. We did receive some correspondence from individuals who considered that the Commission should have written to them directly informing them about the review. While we of course understand and sympathise with this view, it is not financially feasible without a significant increase in our communications budget, in order to cover the cost of a letter being sent to every household in England.

### **Continued requirement on materials provided to places of deposit**

60. The legislation requires the Commission to ensure that a copy of its initial and revised proposals for each proposed constituency is made available for inspection at a place in the area of that proposed constituency. Therefore, once we have determined our proposals, the secretariat works with local authorities and other public-facing bodies to identify suitable public locations for the materials, for example local libraries and public areas of council offices. For the 2023 Review, we were required to make available proposals at a minimum of 543 proposed constituencies in England.
61. This exercise was more challenging than during previous reviews, as a number of venues were not comfortable accepting physical materials, particularly during the Coronavirus pandemic. We conducted an evaluation of interest in the materials at all the places of deposit and noted that most places had very low numbers of requests to see the documents and, in some cases nobody at all requested to see the materials during either consultation period.
62. The printing of the materials costs a considerable amount of public money and also has environmental impacts. Given the significant number of people who now participate in the consultations online, we would ask that the requirement on the Commission to make available physical copies of its materials at places of deposit be reconsidered. Even though there remains a number of individuals with no private access to the internet, public access is generally available through terminals at public libraries, for example, so perhaps a requirement on Commissions to notify – at an appropriate stage of a review – the authorities that run public libraries of when, where, and how the constituency review consultations can be engaged with would be an appropriate alternative requirement.

### **Availability of a national sub-ward layer in England**

63. As part of the 2023 Review, in our preparatory work, we worked with electoral registration officers and Ordnance Survey to receive electoral data and the Boundary-Line product. Although, as part of this work, we attempted to obtain a complete map of polling districts across England, this was not achievable. The Commission had previously received funding to have Ordnance Survey formulate this mapping layer at the 2018 Review, but, without any legislative change and ongoing funding, this very quickly became outdated, due to the constantly changing nature of these highly localised administrative boundaries. Therefore, when considering whether to split a ward between constituencies, we had to commission from individual local authorities copies of polling district boundaries, which we then had to ensure were mapped accurately. Doing this on a case-by-case basis was a lengthy and at times onerous process, which is far from ideal given the already pressing constraints of working to a statutory timetable for delivery of a review. We would



therefore strongly suggest that further thought be given to whether a mapping layer of polling districts could be both re-established and – crucially – thereafter maintained on a rolling basis.

### **Fallow years between reviews and sponsorship of the Parliamentary Boundary Commission for England**

64. Under the current statutory provisions, a constituency review takes place every eight years, but active review work must be completed within a much shorter period – a little longer than two and a half years. With the possibility of more localised ‘interim reviews’ having been removed from the legislation in 2011, there is little more than recording and monitoring of annual electorates to occupy the Commission and its staff in the other ‘fallow’ five and a half years. As a direct result, we currently experience the loss of most if not all of our secretariat staff during this period, and then need to go through a recruitment and technical training process for new staff as a new review begins, all of which involves a cost in terms of both recruitment and loss of knowledge and expertise. Furthermore, we are also likely to experience the loss of experience of Commissioners, given that public appointment guidance is generally that any public appointment should be for a maximum period of two five-year terms.
65. We believe this poses a significant risk to the capability of the Commission ahead of the next review. In terms of Commissioner appointments, it might be appropriate to consider appointments of eight years to recognise the exceptional case that boundary review cycles are now in eight-year periods. We note that the Constitution Unit at University College London recently made a similar observation.
66. In terms of the secretariat, we consider that a solution could be to explore closer working relationships with the Local Government Boundary Commission for England (LGBCE) and the other Boundary Commissions in the United Kingdom. We consider this could provide potential benefits in terms of efficient sharing of best practice and in areas of mutual cooperation.

### **Timely refresh of constituencies**

67. The current constituencies were brought into force at the General Election in 2010, but were for almost all constituencies the product of the last completed general review under the pre-2011 legislation, the electorate data for which was set at the beginning of that review, in 2000. If the recommendations set out later in this report are approved by Order in Council, then they would be the new constituencies at the General Election thereafter.
68. The current constituencies – brought into being at the 2010 General Election – are mostly not within the new +/-5% range from the electoral quota, and never were (even in 2010, only 196 of England’s 533 constituencies were within that range). Two subsequent reviews to address that situation were not taken forward, with the net effect being an extended period of time during which a broad disparity of constituency electorates was allowed to persist, offending against the very principle that the legislation exists to maintain. The changes made to the legislation in 2020 should mean that there is not such a long period elapsing between implemented reviews in future.

## Final recommendations

69. Our final recommendations are set out in a report of three volumes. This volume, containing the previous introductory chapter and the following commentary on how we have reached our final recommendations, should be considered alongside Volume two: Constituency names, designations and composition, and Volume three: Maps. The remainder of this volume sets out, by each region in England, our final recommendations for new constituency boundaries, and how we arrived at them.
70. As we point out in the previous chapter, the legislation under which this review has taken place, combined with the amount of changes within the electorate since the last time a constituency review was implemented, mean that significant change to the existing pattern of boundaries is inevitable. In fact, our final recommendations result in only 55 of the existing 533 constituencies in England remaining completely unchanged. The scale of change in each region is set out in the below table.

Region	Number of recommended constituencies unchanged from existing	%
East Midlands	7	15%
Eastern	3	5%
London	3	4%
North East	2	7%
North West	12	16%
South East	14	15%
South West	2	3%
West Midlands	8	14%
Yorkshire and the Humber	4	7%
<b>Total England</b>	<b>55</b>	<b>10%</b>



## East Midlands

71. The East Midlands currently has 46 constituencies. Of these constituencies, 17 have electorates within the permitted range. The electorates of seven constituencies currently fall below the permitted range, while the electorates of 22 constituencies are above. Our proposals increase the number of constituencies in the region by one, to 47.
72. The East Midlands comprises the counties of Derbyshire (including the City of Derby), Leicestershire (including the City of Leicester), Lincolnshire, Northamptonshire, Nottinghamshire (including the City of Nottingham), and Rutland, and is covered by a mix of district and county councils, and unitary authorities.
73. We appointed two Assistant Commissioners for the East Midlands – Peter Fish CB and Alison Blom-Cooper – to assist us with the analysis of the representations received during the first two consultation periods. This included chairing public hearings, which were held in the region in order to hear oral evidence directly from the public. The dates and locations of these hearings were:
  - Nottingham: 7–8 March 2022
  - Leicester: 10–11 March 2022
  - Northampton: 14–15 March 2022.

### Sub-division of the region

74. In formulating our initial proposals, we noted that the electorate of the East Midlands of 3,481,126 results in it being entitled to 47 constituencies, an increase of one. We then considered how this number of constituencies could be split across the region.
75. We noted that Northamptonshire's electorate of just under 530,000 results in a mathematical entitlement to 7.22 constituencies. We therefore decided to allocate the county seven constituencies and treated it as a stand-alone sub-region. Similarly, we noted that Derbyshire (including the City of Derby) has an electorate of 790,982, which results in an entitlement to 10.78 constituencies. We therefore decided to allocate 11 constituencies to Derbyshire and Derby, the same as the existing allocation, and treat it as a stand-alone sub-region also.
76. The combined electorate of Nottinghamshire and the City of Nottingham is just over 823,000, which results in the area being mathematically entitled to 11.22 constituencies, the same as the existing number, and we again decided to treat it as a sub-region.
77. Lincolnshire has an electorate of 551,904, resulting in a mathematical entitlement to 7.52 constituencies. Therefore, it was necessary to pair Lincolnshire with a neighbouring county in order to develop a pattern of constituencies that all remain within the permitted electorate range. We identified that Rutland had a mathematical entitlement to 0.41 constituencies, which when paired with Lincolnshire resulted in a mathematical entitlement to 7.93 constituencies. We therefore proposed allocating eight constituencies to a sub-region formed of Lincolnshire and Rutland together.

78. In formulating our initial proposals we recognised that Rutland presently was included in a sub-region with Leicestershire (including the City of Leicester), which was not necessary, given that Leicestershire and the City of Leicester, with an electorate of 754,549, resulted in a mathematical entitlement to 10.28. We therefore proposed allocating Leicestershire (including the City of Leicester) ten constituencies and treating it as a stand-alone sub-region.
79. The use of the sub-regions outlined above was largely supported during the consultation on the initial proposals. We did receive some objections to the split of sub-regions with an alternative arrangement suggested as:
- a sub-region comprising the areas of Leicestershire, Rutland and Lincolnshire
  - a sub-region comprising the areas of Derbyshire and Nottinghamshire.
80. In formulating our revised proposals, we considered that no persuasive evidence had been received to propose an alternative sub-region of Nottinghamshire and Derbyshire, particularly given the little changes required to the existing constituencies in Derbyshire. However, we were persuaded by the evidence received to adopt an alternative sub-region combining Leicestershire, Rutland and Lincolnshire. We considered that this sub-region allowed for improvements to the initial proposals in respect of the statutory factors.
81. In response to our revised proposals, we did not receive any further evidence that would justify the use of alternative sub-regions to those we adopted in our revised proposals. Therefore, the sub-regions we propose as part of the final recommendations are:
- Derbyshire (including City of Derby)
  - Nottinghamshire (including City of Nottingham)
  - Leicestershire (including City of Leicester), Lincolnshire and Rutland
  - Northamptonshire.

## Derbyshire

### Initial proposals

82. Of the 11 existing constituencies in Derbyshire, eight were within the permitted electorate range. Under our initial proposals, we proposed retaining five existing constituencies: Chesterfield; Derby North; Derby South; Erewash and High Peak – although we proposed renaming the Erewash constituency Ilkeston and Long Eaton to reflect the main population centres of the constituency. Additionally, we proposed retaining the existing constituencies of Amber Valley, Bolsover and North East Derbyshire, with minor modifications to reflect changes to local government ward boundaries.
83. The existing constituencies of Mid Derbyshire and Derbyshire Dales both fell below the permitted electorate range and the existing constituency of South Derbyshire was above the permitted electorate range. As part of our initial proposals, we therefore proposed that the South West Parishes ward be included in the Mid Derbyshire constituency, and the wards of Hilton and Hatton

be included in the Derbyshire Dales constituency, which would then bring all three constituencies within the permitted electorate range.

### **Consultation on the initial proposals**

84. In response to the consultation on the initial proposals, our proposed composition of constituencies across Derbyshire was broadly supported, although we did receive a significant number of representations that objected to the name of the proposed Ilkeston and Long Eaton constituency, with respondents (both nationally and locally) suggesting that the current name of Erewash should be retained.
85. We did receive some opposition to the proposed High Peak and Derbyshire Dales constituencies, with the counter proposal that the ward of Bradwell should be included in the High Peak constituency. We also received some opposition to the proposed minor changes to the Derbyshire Dales, Mid Derbyshire and South Derbyshire constituencies to bring them within the permitted electorate range. The focus of these representations was to retain the wards of Hatton and Hilton in the South Derbyshire constituency.
86. Our Assistant Commissioners considered the evidence received and they were not persuaded to recommend to us changes to the boundaries of the proposed constituencies in the county. They considered that doing so in the manner suggested in the counter proposals received would require substantial changes to a number of existing constituencies which would otherwise remain unchanged. However, they did recommend that the proposed constituency of Ilkeston and Long Eaton should retain the name Erewash. We agreed with their proposal.

### **Revised proposals**

87. Our revised proposals for Derbyshire were, therefore, identical boundaries to those put forward in our initial proposals, although they now included the constituency name of Erewash.

### **Consultation on the revised proposals**

88. In response to the consultation on the revised proposals, we continued to receive support for our proposed constituencies in Derbyshire, including support for our proposal to revert to the original constituency name of Erewash. We again received some objection to the inclusion of the Hatton and Hilton ward in the South Derbyshire constituency and the suggestion that the Bradwell ward be included in the High Peak constituency.

### **Final recommendations**

89. Having considered the evidence received, we are not persuaded to amend the boundaries or names of any of our proposed constituencies in Derbyshire. We do not consider that any further evidence or argument has been provided that might justify changing the constitution of our revised constituencies. Our final recommendations in this sub-region are therefore for constituencies of: Amber Valley; Bolsover, Chesterfield; Derby North; Derby South; Derbyshire Dales; Erewash; High Peak; Mid Derbyshire; North East Derbyshire; and South Derbyshire. These constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.

## Nottinghamshire

### Initial proposals

90. Of the existing 11 constituencies in Nottinghamshire, three were within the permitted electorate range: Broxtowe, Newark and Gedling. Two, Nottingham East and Nottingham North, fell below the range and six (Ashfield, Bassetlaw, Mansfield, Nottingham South, Rushcliffe, and Sherwood) were above. Under our initial proposals we proposed changes to all the existing constituencies in Nottinghamshire. We proposed reconfigured Nottingham East and Nottingham South constituencies, both of which included only wards from the City of Nottingham. Our proposed Nottingham North and Kimberley constituency included six City of Nottingham wards and three wards from the Borough of Broxtowe (Watnall & Nuthall West, Kimberley, and Nuthall East & Strelley). As a result of this configuration, we proposed a Broxtowe constituency which ran further north than the existing one, to include the wards covering the community of Eastwood.
91. As the existing Ashfield constituency was below the permitted electorate range and the Mansfield constituency was above, we proposed including the District of Mansfield wards of Brick Kiln and Grange Farm in the Ashfield constituency, which brought both constituencies within the permitted electorate range. In the remainder of the county, we proposed minor changes to the existing constituencies, including in some cases just to realign them with new local government ward boundaries: this was the case for the proposed Gedling, Rushcliffe and Sherwood constituencies. We included the District of Bassetlaw wards of Clayworth and Sutton in the proposed Newark constituency, which brought the Newark and Bassetlaw constituencies within the permitted electorate range. We also proposed renaming the Bassetlaw constituency Worksop and Retford, in order to reflect the main population centres included in the constituency.

### Consultation on the initial proposals

92. In response to the consultation on our initial proposals, we received some support for our proposed constituencies in Nottinghamshire. We received opposition to the proposed Nottingham North and Kimberley constituency, particularly the inclusion of the Borough of Broxtowe wards of Kimberley, Nuthall East & Strelley, and Watnall & Nuthall West in the constituency. Some respondents objected to this proposal as it would include different communities in the same constituency and this part of Broxtowe was physically divided from Nottingham. The counter proposal received was to include the above three wards in the Broxtowe constituency and instead reconfigure the Nottingham North and Kimberley, and Nottingham South constituencies, including the proposal to include the wards of Beeston Central, Beeston North and Beeston Rylands in the Nottingham South constituency. This counter proposal was supported locally, particularly by respondents from the Kimberley area. However, we also received support for our initial proposals, with a number of representations concerned that the counter proposal divided the area of Beeston between constituencies.
93. We also received some opposition to our proposed Mansfield constituency, particularly that the wards of Brick Kiln and Grange Farm were in close proximity to Mansfield and thus should be included in the same constituency as the town. A number of counter proposals were received, some of which only sought changes between the Ashfield and Mansfield constituencies and some which also proposed changes to the neighbouring Sherwood constituency. However, we also

received support for the initially proposed Mansfield constituency, with respondents considering that this was the best solution available that was based on whole local government wards.

94. We received limited opposition to our proposed Newark constituency, with respondents suggesting that the District of Bassetlaw ward of Clayworth had close links with Retford and therefore should be included in the same constituency. The counter proposals received suggested instead that the Newark constituency could extend further north to include the ward of Beckingham. Our proposed name of Worksop and Retford was also opposed to by respondents, with many of them suggesting the constituency should continue to be named Bassetlaw.
95. The remaining pattern of constituencies across Nottinghamshire was largely uncontroversial and generally supported. However, we did receive a proposal that the Sherwood constituency should be renamed Sherwood Forest.

### **Revised proposals**

96. In light of the representations received, our Assistant Commissioners recommended that we modify our initial proposals for Nottinghamshire.
97. Our Assistant Commissioners considered that the initial proposals in Mansfield broke community ties, but after they visited the area to assess the alternative counter proposals, they were not persuaded by those alternative configurations that proposed changes between the Mansfield, Ashfield and Sherwood constituencies, as these alternatives divided the area of Hucknall. They considered that an alternative that included the ward of Bull Farm and Pleasley Hill and part of the Berry Hill ward was likely to better reflect community ties. Having considered the advice of our Assistant Commissioners, we adopted this alternative pattern of constituencies as part of our revised proposals.
98. Our Assistant Commissioners also considered the competing arguments in terms of the proposals for Broxtowe and Nottingham North. They observed after visiting the area that the counter proposal divided the Beeston area between constituencies. They recognised that the Kimberley, Nuthall and Watnall areas were a separate community to Nottingham, but combining two distinct areas in a single constituency was better than dividing one between constituencies. They therefore recommended no changes to our initial proposals for either of these constituencies. We accepted their recommendations.
99. In light of the evidence received and advice from our Assistant Commissioners we did decide to amend the name of two proposed constituencies. We decided to rename the Sherwood constituency Sherwood Forest, as evidence received considered this name better reflected the whole area covered by the constituency. We also decided to retain the Worksop and Retford constituency's existing name of Bassetlaw as there was strong local support for this. We noted the concerns regarding Clayworth ward not being included in a Bassetlaw constituency, but considered that the reconfigurations required were too significant.
100. We did not propose any changes to our initially proposed constituencies of: Gedling; Newark; Nottingham East; Nottingham South; and Rushcliffe.



### **Consultation on the revised proposals**

101. In response to the consultation on our revised proposals, we received broad support for the majority of the proposed constituencies. However, we did receive some opposition to the revised configuration of the Ashfield and Mansfield constituencies, and to the Broxtowe, and Nottingham North and Kimberley constituencies.
102. In Ashfield and Mansfield, we received a counter proposal that we should revert to the initial proposals for these two constituencies. Proponents of this position considered that the District of Mansfield ward of Bull Farm and Pleasley Hill had poor road connections to the Ashfield constituency, with links via a rural road, whereas the wards of Brick Kiln and Grange Farm had good road connections to Ashfield along the A38. Residents of the Bull Farm and Pleasley Hill ward, particularly, in the eastern part of this ward, considered that they had close community ties with Mansfield.
103. Slightly south in the county, we received a counter proposal for the Broxtowe, and Nottingham North and Kimberley constituencies. This counter proposal was different to those received during previous consultations, in that Beeston was no longer being divided between constituencies. The counter proposal sought to make a smaller change between the constituencies by proposing the division of the Watnall and Nuthall West ward, in order to include all of Greasley Parish in the Broxtowe constituency. We also received some representations that advocated we adopt the counter proposal for the Broxtowe, and Nottingham North and Kimberley constituencies, as outlined above.
104. We received a limited number of representations that commented on the proposed name of the Sherwood Forest constituency. Those that opposed the constituency name considered the change unnecessary. Our proposal to revert to the name Bassetlaw in our revised proposals was broadly supported.

### **Final recommendations**

105. Having considered the evidence received, we are not recommending any changes to the boundaries of our revised proposals for Nottinghamshire. We noted the representations regarding whether we should revert to our initial proposals for the Ashfield and Mansfield constituencies. As we have set out above, the existing constituency of Mansfield is too large, and therefore it must be reconfigured. During all consultations we have received evidence identifying local community ties in the area but it has not been possible to satisfy all the responses received.
106. We considered the different arguments and evidence received in regards to our initial and revised proposals for the Ashfield and Mansfield constituencies. In both cases, we received evidence suggesting that the area we proposed be transferred from the existing Mansfield constituency to Ashfield shared community ties with neighbouring parts of Mansfield. We also considered the evidence in regards to the road connections of the wards of Bull Farm and Pleasley Hill, Brick Kiln, and Grange Farm. We also considered the pattern of existing constituencies and that the initial proposal transferred a far greater number of electors from the existing Mansfield constituency. Having considered the evidence received during all consultations, we have decided to retain our revised proposals as our final recommendations. We consider that this pattern of constituencies achieves the best balance of the statutory factors.

107. We also reflected on the arguments put forward in regards to reconfiguring the Broxtowe, and Nottingham North and Kimberley constituencies. We believe that splitting the Watnall and Nuthall West ward between constituencies would likely break community ties, particularly as the boundary proposed for the split ward would divide a number of residential properties on Larkfield Road. Furthermore, in light of evidence received during the initial consultation, we consider that this split would likely break community ties between Kimberley, Nuthall and Watnall.
108. Finally, we have considered whether to amend the names of any constituencies in the sub-region. We note that some respondents considered that we should return to the constituency name Sherwood as opposed to our revised proposal of Sherwood Forest. We have decided to retain the name Sherwood Forest as part of our final recommendations as this has been supported locally.
109. Our final recommendations in this sub-region are therefore for constituencies of: Ashfield; Bassetlaw; Broxtowe; Gedling; Mansfield; Newark; Nottingham East; Nottingham North and Kimberley; Nottingham South; Rushcliffe; and Sherwood Forest. The areas contained by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## **Leicestershire, Lincolnshire and Rutland**

110. As set out earlier in the sub-region report, under our initial proposals Lincolnshire and Rutland formed a sub-region, with Leicestershire forming a separate sub-region. However, in response to representations on the initial proposals, we decided to modify our sub-regions in this part of the East Midlands and our revised proposals were for a combined Leicestershire, Rutland and Lincolnshire sub-region.
111. This sub-region included one constituency – Rutland and Stamford – which included parts of Leicestershire and Lincolnshire and all of Rutland. As noted above in the report, we do not propose modifying this sub-region, therefore our final recommendations will continue to propose a constituency that includes parts of Lincolnshire and Leicestershire and all of Rutland. These are detailed later in this section.

## **Leicestershire**

### **Initial proposals**

112. Of the ten existing constituencies in Leicestershire, only Leicester South was within the permitted electorate range, Leicester West fell below and the remaining eight constituencies – Bosworth; Charnwood; Harborough; Leicester East; Loughborough; North West Leicestershire; Rutland and Melton; and South Leicestershire – were all above. Under our initial proposals we proposed to modify all the existing constituencies in Leicestershire.
113. In formulating our initial proposals, we recognised that it was possible to allocate three whole constituencies to the City of Leicester, but that doing so provided little flexibility in formulating a pattern of constituencies in the remainder of the county. Therefore, as part of our initial proposals, we proposed a Leicester West and Glenfield constituency that included two District of Blaby wards of Ellis and Fairstone – the two wards encompassing the town of Glenfield. We also proposed that this constituency include the City of Leicester ward of Belgrave and that the

Leicester East constituency be reconfigured to include the ward of Spinney Hills. We likewise reconfigured the Leicester South constituency to include the ward of Westcotes.

114. To the west of the City, we proposed a North West Leicestershire constituency that was broadly similar to the existing one, although it would no longer include the District of North West Leicestershire wards of Appleby, and Oakthorpe & Donisthorpe, with these wards included in a reconfigured Hinckley and Bosworth constituency. In the south of the county, we proposed a Harborough constituency that was coterminous with the District of Harborough, and a Blaby, Oadby and Wigston constituency, which included all of the Borough of Oadby and Wigston, and seven wards from the District of Blaby.
115. In the north of the county, we proposed a Loughborough constituency that was similar to the existing one, although it no longer included the Borough of Charnwood wards of Sileby and The Wolds. We proposed that these wards, along with six other wards from the Borough of Charnwood and all of the Borough of Melton be included in a Melton and Syston constituency. Finally in the county, we proposed a Mid Leicestershire constituency that included the remaining five wards of the Borough of Charnwood, three wards from the Borough of Hinckley and Bosworth, and nine wards from the District of Blaby, including the towns of Fosse, Enderby and Narborough.

### **Consultation on the initial proposals**

116. In response to the consultation on our initial proposals, we received some support for these, specifically for the proposed constituencies of Hinckley and Bosworth, and North West Leicestershire, and the fact we had treated Leicestershire and the City of Leicester as a single sub-region. However, concerns were raised in opposition to this approach, specifically the configuration of a constituency that included the area of Glenfield in a constituency with the City of Leicester. We also received opposition to the proposed configuration of constituencies in the City of Leicester. These representations were primarily concerned that the removal of the Belgrave ward from the Leicester East constituency broke community ties. On similar grounds, we also received representations that objected to the inclusion of the Spinney Hills ward in the Leicester East constituency, with representations outlining that the ward had local ties with wards in the Leicester South constituency.
117. We received a number of counter proposals that sought to address the concerns raised in regards to the City of Leicester. Many of these counter proposals sought to propose three whole constituencies for the City of Leicester and proposed no constituency that crossed the city boundary. As previously set out earlier in the report, some of these counter proposals suggested a constituency that combined parts of the counties of Leicestershire and Lincolnshire, and all of Rutland.
118. In the east of the county, we received opposition to the proposed Melton and Syston constituency. Many of these representations were concerned that the Borough of Melton and Rutland County would no longer form a constituency. Respondents considered that these areas had shared community needs and challenges, with Melton and Syston having different community identities, i.e. rural and suburban. Furthermore, we received opposition to the inclusion of The Wolds ward in the Melton and Syston constituency. Respondents considered this ward had close ties with Loughborough.

119. We received some support for the proposed following constituencies: Blaby; Oadby and Wigston; Harborough; and Mid Leicestershire. Those in support of these constituencies considered that the coterminosity of the Harborough constituency with the local authority was positive and that the constituency of Blaby, Oadby and Wigston comprised principally suburban areas. However, we also received significant opposition to these three proposed constituencies. We received evidence suggesting that the transport links of these constituencies were incoherent, as under our initial proposals these constituencies were configured east–west, whereas representations considered that the major transport links were north–south. The representations also raised concerns that the initial proposals did not reflect community ties and were also a significant departure from the pattern of existing constituencies in this part of Leicestershire.

### **Revised proposals**

120. We noted that the Hinckley and Bosworth, and North West Leicestershire constituencies had both been largely supported, and therefore decided not to amend these constituencies when formulating our revised proposals. However, we considered that persuasive evidence had been received to reconsider the pattern of constituencies across the remainder of Leicestershire and the City of Leicester.
121. As noted above, we received different counter proposals, some which allocated three whole constituencies to the City of Leicester and some proposed crossing the City boundary. We noted the concerns raised regarding the inclusion of the Glenfield area in the Leicester West constituency, with alternatives to this proposing that two Borough of Oadby and Wigston wards (Oadby Grange and Oadby Uplands) be included in a reconfigured Leicester East constituency.
122. Our Assistant Commissioners investigated the alternatives and visited the area in order to better understand the issues. Having considered the evidence, they recommended to us that the City of Leicester should be allocated three whole constituencies. They proposed that Belgrave ward be retained in the Leicester East constituency, the ward of Spinney Hills in the Leicester South constituency and the ward of Westcotes in the Leicester West constituency. In order to bring the Leicester East and Leicester South constituencies within the permitted electorate range they proposed that the Evington ward be split between both constituencies, with the southernmost polling district (EVF) being included in the Leicester South constituency. We agreed with the recommendation of our Assistant Commissioners and included reconfigured constituencies of Leicester East, Leicester South and Leicester West in our revised proposals.
123. Our Assistant Commissioners then considered what changes needed to be made to other constituencies within Leicestershire. They considered that it was very challenging to formulate a pattern of constituencies in the remainder of the county that were within the electoral quota and reflected the statutory factors. Therefore, they investigated alternative patterns of constituencies that combined parts of Leicestershire with all of Rutland and parts of Lincolnshire. They considered this arrangement enabled a pattern of constituencies across the sub-region that better reflected the statutory factors.
124. The Assistant Commissioners investigated the representations received concerning the inclusion of Melton Mowbray and Rutland in the same constituency. They noted that no valid counter proposals were received that included both local authorities in the same constituency. They also investigated counter proposals that included Melton Mowbray with Market Harborough in a constituency, but were not persuaded that this configuration would be an improvement on the

initial proposals. They therefore proposed only a minor change to the initially proposed Melton and Syston constituency. They proposed that The Wolds ward be included in the Loughborough constituency rather than Melton and Syston, as had been proposed by respondents. We accepted this proposal.

125. The Assistant Commissioners also proposed some small changes to the Mid Leicestershire constituency. They recommended that this constituency now include the wards covering the Glenfield area and the five District of Blaby wards of: Muxloe; Forest; Winstanley; Millfield; and Ravenshurst and Fosse. We noted that this configuration was closer to the existing constituency boundaries. We accepted the Assistant Commissioners' recommendations and adopted modified constituencies of Loughborough, Melton and Syston, and Mid Leicestershire, as part of our revised proposals.
126. In the south of the county the Assistant Commissioners recommended changes to the initial proposals that were more significant, though more in keeping with the existing pattern of constituencies. They proposed a revised South Leicestershire constituency which had been expanded to now include the wards of Fleckney and Bosworth following changes to local government boundaries in the area. Rather than a coterminous Harborough constituency, they recommended a Harborough constituency that included all of the Borough of Oadby and Wigston and seven wards of the Borough of Harborough, including those covering the town of Market Harborough. We noted that this configuration was very close to the existing Harborough constituency. We accepted the recommendations of our Assistant Commissioners and adopted these constituencies as part of our revised proposals. Finally, they recommended that the remaining three wards of the Borough of Harborough – Billesdon & Tilton, Nevill, and Thurnby & Houghton – be included in a cross-county boundary constituency with all of Rutland County and parts of Lincolnshire County, details of which are set out in the Lincolnshire and Rutland section below.
127. Therefore, our revised proposals for Leicestershire were for constituencies of: Harborough; Hinckley and Bosworth; Leicester East; Leicester South; Leicester West; Loughborough; Melton and Syston; Mid Leicestershire; North West Leicestershire; and South Leicestershire.

### **Consultation on the revised proposals**

128. In response to the consultation on our revised proposals, we received some support for our revised pattern, including the modifications made to the sub-region which allowed the City of Leicester to be allocated three whole constituencies while minimising disruption to the rest of the county.
129. We received some opposition to the proposed Harborough constituency, with respondents stating that the areas of Oadby and Wigston had different characteristics to Market Harborough, and instead saying that we should revert to the initial proposals. Some respondents also proposed the constituency should be named Harborough, Oadby and Wigston to reflect that it combined parts of two local authorities. We also received a counter proposal which proposed that the Harborough constituency should include the Bosworth and Fleckney wards, and thus outlined consequential changes to the South Leicestershire constituency. The proponents of this counter proposal considered that it would better reflect community ties. However, we also received support for our proposed Harborough and South Leicestershire constituencies, particularly regarding the fact that they better reflected the existing constituency boundaries.

130. In Leicester we again received support for our proposed constituencies of Leicester East, Leicester South and Leicester West. Respondents were particularly supportive of Belgrave ward being included in the Leicester East constituency. We received limited opposition to the splitting of the Evington ward between constituencies; those that commented on the split considered that the whole ward should be included in a single constituency. We received limited opposition to the proposed Leicester West constituency; those that commented considered that the Aylestone ward should be retained in a Leicester South constituency as it had community ties with the wards of Eyres Monsell and Saffron.
131. As we did during the initial proposals consultation, we received support for our proposed Hinckley and Bosworth, and North West Leicestershire constituencies. Those in opposition to this pattern commented that the Oakthorpe & Donithorpe ward should be included in the North West Leicestershire constituency, although they did not submit any new counter proposals.
132. We mainly received support for our proposed constituencies of Loughborough, Melton and Syston, and Mid Leicestershire. Those in opposition largely commented again on the inclusion of Melton Mowbray and Syston in the same constituency. We did receive some counter proposals for all three constituencies. One of these counter proposals was identical to that received in earlier consultations, which was to include the Sileby ward in the Loughborough constituency, Quorn and Mountsorrel Castle within the Mid Leicestershire constituency, and the two Birstall wards in the Melton and Syston constituency. An alternative counter proposal was received, which sought to split the Barrow and Sileby West ward to include the AK polling district in the Melton and Syston constituency in order to realign the constituency boundary with the new Borough of Charnwood ward boundaries. We also received some representations commenting on the name of the proposed Mid Leicestershire constituency, with an alternative suggestion of Charnwood in order to better reflect the local authority covered by some of the constituency.

### **Final recommendations**

133. We have considered the evidence received and are not making changes to the boundaries of our proposed constituencies in Leicestershire. We recognise the opposition received regarding Melton Mowbray and Rutland not being in the same constituency, but consider that the counter proposals resulted in significant changes to other constituencies that had largely been supported.
134. Similarly, we note the concerns regarding the division of Sileby between constituencies and we did investigate alternative proposals. We considered that the counter proposal to reconfigure Loughborough, Melton and Syston, and Mid Leicestershire constituencies, while better reflecting community ties in Sileby, would likely break community ties between the Quorn and Mountsorrel Castle ward and Loughborough. We also had concerns that this configuration would further extend the Melton and Syston constituency eastwards and require the crossing of the River Soar in the Thurmaston area, which we considered provided for an identifiable boundary. We also considered the alternative proposal to split the Barrow and Sileby West ward in order to reflect the new ward boundaries made by Order during the course of the review, with the intention to also reflect the parish council boundary. We were not persuaded to split this ward, as doing so provided no wider benefits to the pattern of constituencies in the area.
135. We note that some respondents have encouraged us to revert to our initial proposals for the constituencies of Blaby, Oadby and Wigston, and Harborough, although we note that our revised pattern of constituencies for Harborough and South Leicestershire has also been supported

during the consultation. However, we do propose modifying the name of the Harborough constituency. We are renaming the constituency Harborough, Oadby and Wigston to reflect the constituency including all of the latter local authority.

136. We are not minded to modify our revised proposals within the City of Leicester, as we consider that this pattern has been broadly supported and alternative proposals are likely to break community ties.
137. Our final recommendations for Leicestershire are therefore for constituencies of: Harborough, Oadby and Wigston; Hinckley and Bosworth; Leicester East; Leicester South; Leicester West; Loughborough; Melton and Syston; Mid Leicestershire; North West Leicestershire; and South Leicestershire. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## **Lincolnshire and Rutland**

### **Initial proposals**

138. As previously set out, in formulating the initial proposals we identified that it was necessary to pair Lincolnshire with another county and, as part of our initial proposals, we proposed a sub-region of Lincolnshire and Rutland, to which we allocated eight constituencies, one more than the present number of constituencies in Lincolnshire. Of the existing constituencies, four – Boston and Skegness; Gainsborough; Lincoln; and South Holland and The Deepings – have electorates that were within the permitted electorate range, and three – Grantham and Stamford, Louth and Horncastle, and Sleaford and North Hykeham – were above.
139. As part of our initial proposals we considered that the appropriate county boundary crossing between Lincolnshire and Rutland was to include parts of the District of South Kesteven with Rutland. We therefore proposed a Rutland and Stamford constituency that comprised all of Rutland unitary authority and 11 wards from the District of South Kesteven, including the towns of Stamford and Market Deeping.
140. Consequently, we proposed modified constituencies of Grantham and of Sleaford and North Hykeham to bring both within the permitted electorate range. Under our initial proposals the District of North Kesteven wards of Heckington Rural and Osbournby were included in the Grantham constituency.
141. We proposed limited changes to the existing constituencies of Gainsborough and Lincoln. In Lincoln our only changes were to realign the constituency with the new local government ward boundaries. Our proposed Gainsborough constituency was realigned to be coterminous with the boundaries of the District of West Lindsey and thus transferred the Wragby ward to the proposed Louth and Horncastle constituency.
142. We proposed some further changes to the Louth and Horncastle constituency to bring it within the permitted electorate range and to realign the constituency with new local government ward boundaries. We transferred from this constituency the wards of Chapel St. Leonards and of Willoughby with Sloothby to the proposed Boston and Skegness constituency. Consequently, some further changes were proposed to the Boston and Skegness constituency. We transferred

from this constituency the wards of Five Village, and Swineshead and Holland Fen to a reconfigured South Lincolnshire constituency.

### **Consultation on the initial proposals**

143. In response to the consultation on the initial proposals we received some support for our pattern of constituencies across Lincolnshire and Rutland. We received some support for our proposed Rutland and Stamford constituency, with those in support considering that Rutland and Stamford shared community ties. However, we also received significant opposition to this proposed constituency, with respondents highlighting that Rutland had closer ties to Melton Mowbray and Leicestershire.
144. Our proposals for Boston and Skegness, Louth and Horncastle, and Gainsborough were all largely supported. However, we did receive some representations that opposed the changes we had made as part of our initial proposals, particularly the inclusion of the Five Village and Swineshead and Holland Fen wards in the South Lincolnshire constituency.
145. A counter proposal was received that proposed modifications to some of the initially proposed constituencies in Lincolnshire, although a requirement of it was to alter the original sub-region. This counter proposal was for a sub-region of Leicestershire, Rutland and Lincolnshire. Rather than include the area of Market Deeping in a Rutland and Stamford constituency, this constituency would be expanded west to include the three Borough of Harborough wards of Billesdon & Tilton, Nevill, and Thurnby & Houghton. Consequently, under this counter proposal, the existing South Holland and The Deepings constituency could be retained unchanged. Furthermore, the wards of Five Village, and Swineshead and Holland Fen could be returned to the Boston and Skegness constituency and the ward of Halton Holegate could be included in the Louth and Horncastle constituency.
146. Our proposals for Grantham, Lincoln, and Sleaford and North Hykeham were all broadly supported. We did receive some representations commenting on the boundaries of the Lincoln constituency. Alternative counter proposals were received. One considered that the villages on the northern edge of the City of Lincoln boundary should be included in the Lincoln constituency, whereas others considered that a different configuration should be proposed, which reflected the community ties between North Hykeham and Lincoln. We also received some representations that commented on the name of the proposed Grantham constituency, with respondents suggesting that this constituency should be named Grantham and Bourne.

### **Revised proposals**

147. Having considered the evidence received, we decided to revise our initial proposals for parts of Lincolnshire and Rutland. We were persuaded by the evidence to modify the sub-region and expand the Rutland and Stamford constituency westwards to include three District of Harborough wards. We recognised that this pattern did not include Rutland in a constituency with Melton Mowbray, but as previously outlined, we were not able to identify a pattern of constituencies that proposed this composition while formulating a pattern of constituencies across the wider sub-region that reflected the statutory factors.
148. Our Assistant Commissioners were persuaded by the evidence that a revised Rutland and Stamford constituency allowed for the statutory factors to be better reflected across Lincolnshire.



They noted that this revised sub-region allowed for the existing South Holland and The Deepings constituency to be retained unchanged, the return of the Five Village, and Swineshead and Holland Fen wards to the Boston and Skegness constituency, and the inclusion of the Halton Hologate ward in the Louth and Horncastle constituency, which again better reflected the existing boundaries of constituencies.

149. Our Assistant Commissioners also noted that these modifications did not require any changes to the Gainsborough, Grantham, Lincoln, and Sleaford and North Hykeham constituencies, which had all been broadly supported by respondents. Our Assistant Commissioners were not persuaded by the counter proposals to modify the Lincoln constituency, particularly as our proposals largely reflected the existing constituency. They were also not persuaded to propose the constituency name of Grantham and Bourne as both conurbations are within the District of South Kesteven.
150. Our revised proposals were therefore for constituencies of: Boston and Skegness; Gainsborough; Grantham; Harborough; Lincoln; Louth and Horncastle; Rutland and Stamford; Sleaford and North Hykeham; and South Holland and The Deepings.

#### **Consultation on the revised proposals**

151. In response to the consultation on our revised proposals, we received support for our revised constituencies in Rutland and Lincolnshire, including our decision to retain the existing South Holland and The Deepings constituency and the inclusion of the Swineshead and Holland Fen ward in the Boston and Skegness constituency. However, we received some opposition to this constituency, with respondents considering that the inclusion of the Willoughby with Sloothby ward in this constituency did not reflect community ties.
152. We again received some opposition to the Sleaford and North Hykeham constituency, with respondents suggesting that North Hykeham shared community ties with Lincoln and that we should have regard to the new District of North Hykeham ward boundaries.
153. While the boundaries of our proposed Gainsborough and Grantham constituencies were largely supported, we did receive some representations commenting on the names of both constituencies. Some respondents again proposed that the Grantham constituency should be renamed Grantham and Bourne in order to reflect the two largest settlements included in the constituency. Respondents who opposed the constituency name of Gainsborough considered that it should be renamed West Lindsey, given the constituency was coterminous with the district of the same name.

#### **Final recommendations**

154. Having considered the evidence received, we are not persuaded to amend the boundaries of any of our proposed constituencies in Lincolnshire. We are not persuaded by the arguments to modify the boundaries of the Lincoln constituency, as it is largely unchanged. Similarly, we are not persuaded to include the Willoughby with Sloothby ward in the Louth and Horncastle constituency, as doing so would require significant consequential changes to a number of constituencies across Lincolnshire, which have all been broadly supported.
155. We do, however, consider that persuasive evidence has been received to revise the names of the Grantham constituency. We recognise that the existing constituency name is Grantham

and Stamford, with both settlements forming part of the District of South Kesteven. Therefore, adopting the name of Grantham and Bourne would not be inconsistent in reflecting two conurbations within the same local authority. Given this name has received local support we have decided to adopt it as part of our final recommendations. However, we are not minded to modify the name of the proposed Gainsborough constituency. We note that the boundaries of this constituency are largely unchanged and that the alternative name of West Lindsey has not commanded significant support locally.

156. Our final recommendations for Lincolnshire and Rutland are therefore for constituencies of: Boston and Skegness; Gainsborough; Grantham and Bourne; Lincoln; Louth and Horncastle; Rutland and Stamford; Sleaford and North Hykeham; and South Holland and The Deepings. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## **Northamptonshire**

### **Initial proposals**

157. Of the existing seven constituencies in Northamptonshire, only the constituency of Kettering was within the permitted electorate range. The four constituencies of Corby, Daventry, South Northamptonshire and Wellingborough were above the range and both Northampton North and Northampton South were below. As part of our initial proposals, we suggested changes to all the existing constituencies in the county.
158. In formulating our initial proposals we identified that both the recently established unitary authorities of North Northamptonshire and West Northamptonshire were temporarily using the county electoral divisions (hereafter referred to as wards) of the now defunct Northamptonshire County Council, in lieu of a future review from the Local Government Boundary Commission for England. The consequence of this is that the wards are unusually large for a primarily rural area, both geographically and in terms of electorate size. Therefore, in formulating our initial proposals, we considered it necessary to split a small number of wards.
159. Under our initial proposals, we proposed that the existing Northampton North and Northampton South constituencies be expanded southwards. To bring it within the permitted electorate range, the Northampton North constituency included the Riverside Park, and Billing and Rectory Farm wards. The Northampton South constituency included the Abington and Phippsville ward and the remaining southernmost wards that covered the Northampton urban area. Consequently, we proposed a South Northamptonshire constituency that was more rural in character as it no longer included parts of the urban area of Northampton. To bring this constituency within the permitted electorate range we proposed that it include part of the Irchester ward – the villages of Bozeat and Wollaston – the Bugbrooke ward and part of the Silverstone ward. The remaining part of the Silverstone ward was included in a reconfigured Daventry constituency that also included the Earls Barton ward.
160. As the existing Corby constituency was above the permitted electorate range, we proposed transferring from it the Raunds ward, which we included in a reconfigured Wellingborough constituency. Also included in the Wellingborough and Raunds constituency was the remaining

part of the Irchester ward and part of the Finedon ward. The remaining part of the Finedon ward was included in a Kettering constituency which was otherwise unchanged.

### **Consultation on the initial proposals**

161. In response to the consultation on our initial proposals, we received some opposition to our proposal to split three wards in formulating a pattern of constituencies across Northamptonshire. We received some counter proposals which sought to split fewer wards, and thereby proposed a different configuration of constituencies across the county.
162. We also received some support for our approach to formulating the initial proposals, with some respondents considering that the statutory factors could be better reflected by the splitting of more wards.
163. In Northampton, we received a mixture of support and opposition to our initial proposals. Those in support considered that the A45 acted as a clear boundary and that the Northampton North and Northampton South constituencies reflected community ties. However, those in opposition considered that the proposed pattern did not reflect community ties or existing constituencies. The representations particularly commented that the wards of Abington and Phippsville, Castle, and Dallington Spencer should all be included in a Northampton North constituency and the wards of Billing and Rectory Farm, and Riverside Park be included in a Northampton South constituency.
164. We received some opposition to our proposed Daventry constituency, with the majority of representations opposed to the inclusion of the Earls Barton ward in this constituency. Respondents considered that this ward shared closer links with Wellingborough.
165. We received substantial opposition to the proposal to include part of the Irchester ward, specifically the villages of Bozeat and Wollaston, in the South Northamptonshire constituency. Again, respondents stated that they had shared community ties with Wellingborough. We received little opposition to the proposal to split the Silverstone ward between the Daventry and South Northamptonshire constituencies.
166. In the east of the county, we received opposition to our proposed Corby and East Northamptonshire, Kettering, and Wellingborough constituencies. As previously mentioned, we received opposition to excluding the Earls Barton ward and part of the Irchester ward from the Wellingborough constituency. Similarly, we received opposition to the division of the Finedon ward between the Wellingborough and Kettering constituencies, with respondents suggesting that the whole ward should be included in a Wellingborough constituency.
167. We also received opposition to our proposed Corby and East Northamptonshire constituency, with respondents suggesting that the Irthlingborough ward should not be included in this constituency but Wellingborough, and that the Raunds ward should be included in this constituency rather than Wellingborough as we had initially proposed.
168. A number of respondents submitted counter proposals that sought to address these concerns. One counter proposal was for a revised Wellingborough constituency that included all of the Finedon ward and part of the Irthlingborough ward. Under this pattern the Raunds ward was included in a modified Corby and East Northamptonshire constituency and finally, it proposed to split the Corby Rural ward between the Corby and East Northamptonshire, and Kettering

constituencies. Under this proposal would be included in the Kettering constituency the parts of the Corby Rural ward containing: Cottingham; East Carlton; Middleton; Little Stanion and Stanion. However, we did also receive some opposition to the split of the Corby Rural ward between constituencies, with those in opposition concerned that the ward had closer ties with Corby than with Kettering.

### **Revised proposals**

169. Having considered the evidence received, our Assistant Commissioners investigated alternative configurations to constituencies in Northamptonshire and visited the area to observe the evidence received. They recognised that many of the villages surrounding Wellingborough wanted to be included in that constituency, but that it was not possible to include all of them, as doing so would result in a constituency over the permitted electorate range. They therefore investigated alternative configurations. They considered that it was not possible to include all of the Irchester and Earls Barton wards in the Wellingborough constituency, as doing so had significant consequences on both the proposed Daventry and South Northamptonshire constituencies. We noted that including either of these wards in the Wellingborough constituency still required both the Daventry and South Northamptonshire constituencies to be modified, both of which had been broadly supported.
170. The Assistant Commissioners were persuaded to include all of the Finedon ward in the Wellingborough constituency, noting that the ward had strong community ties with the town. Consequently, accepting this proposal required revisions to the Kettering, and Corby and East Northamptonshire constituencies. They proposed including part of the Irthlingborough ward in the Wellingborough constituency, which allowed for the Raunds ward to be returned to the Corby and East Northamptonshire constituency. In order to bring the constituencies within the permitted electorate range they proposed dividing the Corby Rural ward in the manner outlined above. They recognised that, while the split of this ward had received some opposition, it enabled the best reflection of the statutory factors across the east of the county. We accepted their recommendations and proposed reconfigured constituencies of Corby and East Northamptonshire, Kettering, and Wellingborough in our revised proposals.
171. In Northampton, our Assistant Commissioners were persuaded to revise the initially proposed Northampton North and Northampton South constituencies. Having visited the area, they considered that the statutory factors were better reflected by including the wards of Billing and Rectory Farm, and Riverside in the Northampton South constituency and the wards of Abington and Phippsville, Castle, and Dallington Spencer in the Northampton North constituency. The Assistant Commissioners considered that this pattern better reflected community ties and the boundaries of the existing constituencies.

### **Consultation on the revised proposals**

172. In response to the consultation on our revised proposals, we received some support for our configuration of constituencies across the county. However, we also received some opposition to our revised proposals, including a counter proposal for the proposed constituencies of Corby and East Northamptonshire, Daventry, Kettering, and Wellingborough. We also received some opposition to our proposal to split the wards of Corby Rural and Irthlingborough between constituencies. In terms of the Corby Rural wards, respondents considered that the villages in this ward had community ties with Corby. The representations received in regard to the

Irthlingborough ward considered that our proposed ward split divided the Crow Hill area from the remainder of Irthlingborough.

173. The above counter proposal suggested that all of the Corby Rural ward could be retained in the Corby and East Northamptonshire constituency, subject to a number of consequential changes. These included splitting the Earls Barton, Irthlingborough and Thrapston wards between constituencies. This counter proposal also required modifications to the proposed constituencies of Daventry, Northampton South, and South Northamptonshire. This counter proposal sought to resolve concerns that the parishes of Wellingborough and Irchester were divided and that we had divided the Corby Rural community under our revised proposals. However, as set out above, resolving these issues required changes to nearly all the constituencies in the county.
174. We also received another counter proposal that suggested splitting the Earls Barton ward between constituencies. This counter proposal only suggested that the polling district WGB be included in the Wellingborough constituency. The reason for this proposal was to incorporate new housing on the edge of Wellingborough town in the constituency of the same name. Some representations were also received that proposed we rename the Wellingborough constituency as Wellingborough and Rushden in order to reflect the two main conurbations included in the constituency.
175. In the area of Northampton town, we received some support for our revised proposals, with respondents considering that they better reflected community ties. However, we also received some opposition to our Northampton North and Northampton South constituencies, with respondents urging us to revert to our initial proposals for both constituencies. Proponents of this pattern considered that the wards of Billing and Rectory Farm, and Riverside were divided from other parts of the Northampton South constituency. Furthermore, some respondents considered that the revised proposals divided the town centre of Northampton between constituencies.

### **Final recommendations**

176. We have again considered the evidence received in relation to our proposed constituencies in Northamptonshire. We recognised that we had received some opposition to our revised proposals and therefore investigated the alternatives.
177. We considered that the counter proposal that sought to include the Corby Rural ward in the Corby and East Northamptonshire constituency had merit, particularly in terms of reflecting community ties in the Corby area, and reflected the boundaries of the parish of Irthlingborough. However, we also considered that this counter proposal was likely to break community ties, particularly the splitting of the Thrapston ward, which is currently part of the Corby constituency. We also considered that including all of the Irchester ward in the South Northamptonshire constituency was likely to break community ties. We acknowledge that this ward was split under our revised proposals, however, evidence received during the consultations has suggested the ward shares community ties with Wellingborough.
178. We also again investigated alternatives that would resolve concerns received during the consultation on the revised proposals. However, our investigations identified that other configurations would divide communities or result in reverting to the initial proposals. We are not persuaded that reverting to our initial proposals in this part of the county would better reflect the statutory factors. Therefore, having considered the evidence received, we are not minded to

modify our revised proposals in this part of the county. However, we are minded to modify the Wellingborough constituency to Wellingborough and Rushden in order to reflect the different areas comprising the constituency.

179. We recognised that both support and opposition had been received in regards to our proposed Northampton North and Northampton South constituencies. We therefore visited the area to observe both the initial and revised proposals. Having visited the area, we considered that both the Castle, and Abington and Phippsville wards were an integral part of the city centre and shared community ties with the wards to the north. We also considered the boundary of the River Nene in this part of the city to be clear. We observed that the Billing and Rectory Farm, and Riverside Park wards were similar in character and did share community ties with each other and also with the Talavera ward to the north. We also observed that, in this part of the city, the River Nene was easily traversed along the A45 (Nene Valley Way).
180. We also visited the Dallington Spencer ward given the evidence in representations that the ward shared community ties with Duston East. We considered that the ward shared community ties with both the Castle and Duston East wards, though the A428 (Harlestone Road) provided for a clear boundary between the Dallington Spencer and Duston East wards, including the part of the boundary that does not follow the road. We specifically observed this boundary. Furthermore, we investigated other configurations of constituencies, including the transfer of the Dallington Spencer and River Park wards to the Northampton South constituency. We noted that this configuration of constituencies required a ward to be split to ensure both constituencies would be within the permitted electorate range. We considered it was not appropriate to split the Castle ward and considered whether it was possible to include the three southern polling districts of the Abington and Phippsville ward, bound by the A4500 (Wellingborough Road). Having visited the area we noted that splitting the ward along this boundary would divide a clear retail area and was likely to break community ties.
181. Having considered the evidence received and visited the area, we have decided to retain our revised proposals for Northampton North and Northampton South as part of our final recommendations. We note the evidence received that this pattern may break community ties but consider this is unavoidable across the city in formulating a pattern of constituencies that are within the permitted electorate range. We note that both the initial and revised proposals to some extent reflect the existing pattern of constituencies, with the revised proposals transferring fewer electors from the existing pattern. We therefore consider our revised proposals better reflect the statutory factors.
182. Our final recommendations for Northamptonshire are therefore for constituencies of: Corby and East Northamptonshire; Daventry; Kettering; Northampton North; Northampton South; South Northamptonshire; and Wellingborough and Rushden. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.



## Eastern

183. The Eastern region currently has 58 constituencies. Of these constituencies, 25 have electorates within the permitted range. The electorates of seven constituencies currently fall below the range, while the electorates of 26 are above. Our proposals increase the number of constituencies in the region by three, to 61.
184. The Eastern region comprises the three unitary authority areas of Bedford, Central Bedfordshire and Luton; the county council area of Cambridgeshire, and the unitary authority area of Peterborough; the county council area of Essex, and the unitary authority areas of Southend-on-Sea and Thurrock; and the county council areas of Hertfordshire, Norfolk, and Suffolk
185. We appointed two Assistant Commissioners for the Eastern region – Jane Kilgannon and David Brown QFSM – to assist us with the analysis of the representations received during the first two consultation periods. This included chairing public hearings, which were held in the region in order to hear oral evidence directly from the public. The dates and locations of these hearings were:
- Cambridge: 17–18 March 2022
  - Southend-on-Sea: 21–22 March 2022
  - Ipswich: 24–25 March 2022.

### Sub-division of the region

186. In formulating our initial proposals, we noted that the electorate of the Eastern region of 4,482,127 results in it being entitled to 61 constituencies, an increase of three. We then considered how this number of constituencies could be split across the region.
187. We noted that Cambridgeshire’s electorate of 591,247 results in a mathematical entitlement to 8.06 constituencies. We therefore decided to allocate the county eight constituencies, an increase of one, and treated it as a sub-region. Similarly, we noted that the electorate of Norfolk of 675,778 results in a mathematical entitlement to 9.21 constituencies. We therefore decided to allocate nine constituencies to Norfolk, the same as the existing allocation, and treat it as a sub-region.
188. The combined electorate of the unitary authorities in Bedfordshire is 467,322, which results in the area being mathematically entitled to 6.37 constituencies, meaning it is not possible to consider Bedfordshire as a stand-alone sub-region. We therefore considered how it could be combined with a neighbouring county to form a sub-region. Hertfordshire has an electorate of 841,457, resulting in a mathematical entitlement to 11.47 constituencies. While our investigations noted that it was possible to consider Hertfordshire as its own sub-region, in practical terms it would be very challenging to formulate a pattern of constituencies that best reflected the statutory factors. We therefore proposed combining Bedfordshire and Hertfordshire into one sub-region in our initial proposals, allocating to it 18 constituencies, an increase of one.
189. Essex has an electorate of 1,348,788, resulting in a mathematical entitlement to 18.38 constituencies, meaning Essex could be considered as a sub-region on its own. We identified, however, that Suffolk, with an electorate of 557,535 had a mathematical entitlement to 7.60



constituencies, which meant it could not form a stand-alone sub-region. In our initial proposals we therefore decided to combine Essex and Suffolk into one sub-region, to which we allocated 26 constituencies, an increase of one.

190. The use of the sub-regions outlined above was largely supported during the consultation on the initial proposals. We did receive some objections to the split of sub-regions with alternative arrangements suggested as:
- a sub-region which comprised the areas of Norfolk and Suffolk, resulting in Essex as a stand-alone sub-region
  - a single sub-region which comprised all of Essex, Norfolk, and Suffolk.
191. In formulating our revised proposals we considered that no persuasive evidence had been received to propose an alternative sub-region comprising all of Essex, Norfolk, and Suffolk, particularly as it was unnecessary to propose a sub-region that comprised three counties. However, we were persuaded by the evidence received to adopt an alternative sub-region of Norfolk and Suffolk, resulting in Essex forming a stand-alone sub-region. We considered this configuration of sub-regions allowed for improvements to the initial proposals in respect of the statutory factors.
192. In response to our revised proposals, we received some suggestions that we should revert to the sub-regions of the initial proposals. However, we consider that we did not receive any further evidence that would justify the use of alternative sub-regions to those we adopted in our revised proposals. Therefore, the sub-regions we propose as part of the final recommendations are:
- Bedfordshire and Hertfordshire
  - Cambridgeshire
  - Norfolk and Suffolk
  - Essex.

## **Bedfordshire and Hertfordshire**

### **Bedfordshire**

#### **Initial proposals**

193. Of the six existing constituencies in Bedfordshire, only Bedford was within the permitted electorate range. Two constituencies (Luton North and Luton South) fell below the range and three (Mid Bedfordshire, North East Bedfordshire and South West Bedfordshire) were above. In formulating our initial proposals we proposed changes to all the existing constituencies in Bedfordshire. We proposed relatively minor modifications to the Bedford constituency in order to realign the constituency boundary with new local government ward boundaries. We included the Stopsley ward in our proposed Luton North constituency and the Eaton Bray ward in a Luton South and South Bedfordshire constituency, from the existing South West Bedfordshire constituency. In formulating our initial proposals, we noted that the Stopsley ward had no direct road links to the Luton North constituency, as these were just outside of the constituency

boundary. We proposed some further changes to the existing South West Bedfordshire constituency to realign the boundaries with new local government wards, and also renamed the constituency Dunstable and Leighton Buzzard to reflect the main population centres in the constituency.

194. In the north of the county, we proposed a reconfiguration to the existing North East Bedfordshire constituency, so it again realigned with new local government wards, transferred the Stotfold and Langford ward to the new proposed cross-county Hitchin constituency and included the Kempston Rural ward. We also proposed this constituency be renamed North Bedfordshire, as we considered this name was more appropriate for the constituency. To bring the Mid Bedfordshire constituency within the permitted electorate range, we proposed the wards of Arlesey and Shefford also be included in our cross-county Hitchin constituency (detailed further in the Hertfordshire section of this report). The only other change we proposed to the Mid Bedfordshire constituency was to realign the constituency boundary with new local government wards.

### **Consultation on the initial proposals**

195. In response to the consultation on our initial proposals we received some support for our pattern of constituencies in Bedfordshire, particularly our proposed Mid Bedfordshire constituency, which was largely uncontroversial. The majority of representations in the county were in regard to our proposed Luton North, Luton South and South Bedfordshire, and Dunstable and Leighton Buzzard constituencies. Respondents opposed the Stopsley ward being included in the Luton North constituency, due to the lack of direct road access to the rest of the constituency and the geography of Bradgers Hill dividing the areas. We also received opposition to the inclusion of the Eaton Bray ward in the Luton South and South Bedfordshire constituency, with respondents considering the area had shared community ties with Dunstable.
196. We received various counter proposals which sought to reconfigure our proposed constituencies of Luton North, Luton South and South Bedfordshire, and Dunstable and Leighton Buzzard. One of the counter proposals was for the return of the Stopsley ward to Luton South, with Eaton Bray, along with the Caddington ward being included in a revised South West Bedfordshire constituency, and wards that formed the town of Houghton Regis (Houghton Hall, Tithe Farm, and Parkside) to be included in the Luton North constituency. We received variations on this counter proposal, for example, that only the two wards of Tithe Farm and Parkside be included in the Luton North constituency. We also received some representations commenting on the name of our proposed Luton South and South Bedfordshire constituency. These largely proposed that the constituency should only be named Luton South.
197. In the north of the county, we received a counter proposal that suggested the Kempston Rural ward be included in the Bedford constituency, which would retain all the named Kempston wards in the same constituency. However, we received a number of representations in opposition to this counter proposal, citing that the Kempston Rural ward was different in character to Bedford and was more similar to the wards of the more rural North Bedfordshire constituency. We also received some representations suggesting that the Bedford constituency be renamed Bedford and Kempston.

## Revised proposals

198. In light of the representations received, our Assistant Commissioners investigated the various counter proposals. Most of the counter proposals received sought to retain the Stopsley ward in the Luton South constituency and the Eaton Bray ward in the South West Bedfordshire constituency, which our Assistant Commissioners considered had merit. However, these changes required consequential amendments to constituencies, particularly to our proposed Luton North, and Dunstable and Leighton Buzzard constituencies. They were not persuaded by the counter proposal to transfer the Tithe Farm and Parkside wards to the Luton North constituency, as they considered this would divide the town of Houghton Regis. They were also not persuaded by the counter proposal to transfer the Houghton Hall, Tithe Farm and Parkside wards to the Luton North constituency, as they considered doing so would not reflect the shared community ties between Houghton Regis and Dunstable.
199. As part of their investigations, our Assistant Commissioners also identified that it was possible to include the Stopsley ward in the Luton South constituency and Eaton Bray in South West Bedfordshire by splitting the Dunstable-Icknield ward, with the eastern part being included in the Luton North constituency and the western part in the Dunstable and Leighton Buzzard constituency. While they considered this would reflect the community evidence received in terms of Stopsley and Eaton Bray, they were of the view that this alternative configuration would divide the town of Dunstable between constituencies.
200. Having investigated the alternatives and visited the area to observe the different configurations of constituencies, our Assistant Commissioners recommended to us that there be no changes to the Luton North, Luton South and South Bedfordshire, and Dunstable and Leighton Buzzard constituencies. They considered that the alternative configurations would disrupt local ties and result in constituencies with far greater change to the existing pattern of constituencies. Our Assistant Commissioners were also not persuaded to rename the Luton South and South Bedfordshire constituency as Luton South, as they considered that the initially proposed name reflected that the constituency was formed of wards from two different local authorities. Having considered the evidence and analysis of our Assistant Commissioners, we agreed with them that no changes to the initially proposed constituencies of Dunstable and Leighton Buzzard, Luton North, and Luton South and South Bedfordshire would best reflect the statutory factors.
201. Our Assistant Commissioners also investigated the counter proposal that sought to include the Kempston Rural ward in the Bedford constituency. They were persuaded by the evidence received suggesting this ward did not have shared community ties with Bedford, particularly as areas such as Turvey would be quite geographically distant from the constituency. They were also not persuaded to rename the Bedford constituency Bedford and Kempston, as they considered the existing constituency name was appropriate. They therefore recommended no changes to the initially proposed constituencies of Bedford and North Bedfordshire. We agreed with them.
202. Our revised proposals for Bedfordshire were therefore identical to the pattern of constituencies we proposed for our initial proposals.

## Consultation on the revised proposals

203. We received relatively few representations that commented on the proposed pattern of constituencies in the sub-region. Our proposed constituencies of Luton North, Mid Bedfordshire,

and North Bedfordshire received little comment, although those respondents commenting on the constituencies were generally in opposition.

204. Our proposed Bedford constituency was largely supported, with many respondents stating that to not include the Kempston Rural ward in the constituency was positive.
205. Our proposed Luton South and South Bedfordshire constituency was mainly opposed, with respondents again concerned that the configuration of this constituency broke community ties. We received few comments on the proposed names of constituencies, although we received requests to rename our proposed Dunstable and Leighton Buzzard constituency as Leighton Buzzard and Dunstable. An alternative was also received that proposed renaming the constituency Southern Central Bedfordshire.

### **Final recommendations**

206. Having considered the evidence received, we are not persuaded to amend the boundaries or names of any of our proposed constituencies in Bedfordshire. We do not consider that any further evidence or argument has been provided that might justify changing the constitution of our revised constituencies. Our final recommendations in this sub-region covering Bedfordshire are therefore for constituencies of: Bedford; Dunstable and Leighton Buzzard; Luton North; Luton South and South Bedfordshire; Mid Bedfordshire; and North Bedfordshire. These constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.

## **Hertfordshire**

### **Initial proposals**

207. Of the existing 11 constituencies in Hertfordshire, eight are within the permitted electorate range and three (Hertford and Stortford, South West Hertfordshire, and Watford) above it.
208. We proposed a cross-county boundary Hitchin constituency that combined the town of Hitchin with three Central Bedfordshire unitary authority wards (Stotfold and Langford, Arlesey, and Shefford). We considered these areas to have established road links and local ties with Hitchin. The existing constituencies of North East Hertfordshire, Stevenage, and Welwyn Hatfield were unchanged in our proposals, except to realign the constituency boundaries with new local government ward boundaries. Relatively minor change was proposed to the existing Hertford and Stortford constituency, with the three wards of Stanstead Abbots, Great Amwell, and Hertford Heath transferring to the Broxbourne constituency. The only other change to the Broxbourne constituency was that it would no longer include the Borough of Welwyn Hatfield ward of Northaw & Cuffley, which we proposed be included in the Hertsmere constituency.
209. We considered that a substantial reconfiguration of the existing South West Hertfordshire constituency was necessary to limit further change elsewhere in the county. We therefore proposed a constituency named Harpenden and Berkhamsted, which had an east–west configuration from Tring, through Berkhamsted, to Harpenden, as opposed to the north–south axis of the existing constituency. It would also include the two Borough of Dacorum wards of Watling and Ashridge.

210. The transfer of the Watling and Ashridge wards meant that, to bring the Hemel Hempstead constituency within the permitted electorate range, we proposed the inclusion of the Bovingdon, Flaunden and Chipperfield ward from the existing South West Hertfordshire constituency. We also proposed that Hemel Hempstead should no longer include the Kings Langley ward, which we included in our proposed Three Rivers constituency. While this meant the Kings Langley ward would be the only Borough of Dacorum ward in a constituency otherwise wholly coterminous with Three Rivers district, it was necessary in order to bring the constituency within the permitted electorate range, and united the village of Kings Langley – including the train station – in the same constituency.
211. We proposed a reconfigured Watford constituency that included no District of Three Rivers wards, but instead included the whole of the Borough of Watford, plus the Borough of Hertsmere ward of Bushey North. While this also created an orphan ward,<sup>1</sup> it was necessary to bring the constituency within the permitted electorate range. The only other change to the existing Hertsmere constituency was the inclusion of the Borough of Welwyn Hatfield ward of Northaw & Cuffley, from the existing Broxbourne constituency.
212. The existing St Albans constituency was unchanged except to realign the constituency boundaries with new local government ward boundaries.

### **Consultation on the initial proposals**

213. Our proposed constituencies received a broadly even mix of supporting and opposing representations. We received relatively few counter proposals for alternative patterns of constituencies.
214. A significant number of representations objected to the inclusion of the Sandridge ward in the proposed Harpenden and Berkhamsted constituency, from the existing Hitchin and Harpenden constituency. Many respondents considered that the ward, and in particular the Jersey Farm neighbourhood within it, should be included in the St Albans constituency, due to its close geographical proximity, shared local services, and community ties. Other representations regarding the proposed Harpenden and Berkhamsted constituency were evenly divided between those supporting and opposing. Those in opposition stated that the two towns have little in common regarding local ties and transport links, and that the constituency is split into two parts by the M1 motorway. Conversely, those in support stated that there are links between the towns, and that the new configuration would be no worse than the existing Hitchin and Harpenden constituency.
215. Some representations objected to the inclusion of the Northaw & Cuffley ward, in particular the village of Newgate Street, in our proposed Hertsmere constituency. The area of Newgate Street is in the existing Welwyn Hatfield constituency, but was not included in the constituency in the initial proposals, due to the realignment to new local government ward boundaries. It was argued that it should be retained in the Welwyn Hatfield constituency. However, as it was not possible to include the whole of the ward in the Welwyn Hatfield constituency without removing another ward currently in the constituency, a counter proposal was received that proposed splitting the Northaw

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<sup>1</sup> We use this term to refer to a single ward of one local authority in a constituency where all other wards are from one or more other local authorities.

& Cuffley ward along the existing constituency boundary, to retain Newgate Street village in the Welwyn Hatfield constituency.

216. A number of representations received for the proposed Three Rivers constituency supported our proposed boundaries, but respondents also said that the proposed Three Rivers name was inappropriately unspecific. It was claimed that, even in the local area, let alone across the country, people do not know what area Three Rivers refers to, or indeed which three rivers it references. A number of representations therefore proposed that the existing South West Hertfordshire name remained appropriate and should be retained. It was also noted that the constituency would not be wholly coterminous with the Borough of Three Rivers, as it would include the Borough of Dacorum ward of Kings Langley, and as such the existing name would be a more accurate name than Three Rivers, and would likely resonate more with both locals and those further afield.
217. While we received support for our proposed Hitchin constituency, two counter proposals suggested that the cross-county boundary constituency should instead include the wards that comprise the town of Biggleswade, with wards from the North Hertfordshire and East Hertfordshire local authorities. Furthermore, a number of representations said that, as the proposed Hitchin constituency would cross the county boundary, both counties included should be reflected in the constituency name, with most proposing that either Stotfold, Shefford, or both be included in the name with Hitchin.
218. A number of representations were received regarding the proposed Hertford and Stortford, and Broxbourne constituencies. The majority of these were in opposition to the initial proposals, which included the three wards of Hertford Heath, Great Amwell, and Stanstead Abbots in the Broxbourne constituency, rather than with the town of Hertford, as in the existing Hertford and Stortford constituency. It was suggested by respondents that the close proximity of Hertford Heath to the town, as well as shared amenities such as education services, demonstrated the need for the two areas to be included in the same constituency.
219. The initial proposals for the remainder of the constituencies in Hertfordshire – North East Hertfordshire, Stevenage, Watford, and Hemel Hempstead – did not elicit a large number of representations, and were largely uncontentious and supported.

### **Revised proposals**

220. While there had been some contentious areas in the county, most of them could not be readily addressed, either due to the electorate figures not allowing for it, or because they would necessitate far-reaching consequential changes to constituencies across other areas of the county, where the initial proposals were supported.
221. While our Assistant Commissioners acknowledged the evidence of the links of the Sandridge ward with St Albans, including either the whole of the ward in the St Albans constituency, or only the polling district containing Jersey Farm, would result in the Harpenden and Berkhamsted constituency being below the permitted electorate range. This would then require significant consequential changes elsewhere in the county. Our Assistant Commissioners did not propose any changes to the proposed St Albans constituency, and we agreed with them for these reasons.
222. While our Assistant Commissioners acknowledged that some aspects of the proposed Harpenden and Berkhamsted constituency are not ideal, they also noted that there was some support. The

electorate figures are so tight in this area that any attempt to reconfigure the Harpenden and Berkhamsted constituency would have consequential knock-on effects across the county. They therefore recommended no change to the constituency, and we agreed.

223. With regard to the Northaw & Cuffley ward, we did not consider that the rationale for splitting this ward was persuasive; in particular we considered that dividing the ward would not provide other benefits to the pattern of constituencies in the county. We therefore proposed no revisions to the proposed Welwyn Hatfield and Hertsmere constituencies.
224. We noted the evidence about the name of our proposed Three Rivers constituency. We agreed with our Assistant Commissioners that the evidence and arguments put forward were suitably compelling, and as such we proposed that the name of the constituency should revert to South West Hertfordshire as part of our revised proposals.
225. With regard to our proposed Hitchin constituency, we noted the counter proposals that the cross-county boundary constituency should instead include the wards that comprise the town of Biggleswade, with wards from the North Hertfordshire and East Hertfordshire local authorities. However, we considered that these counter proposals required significant consequential changes to proposed constituencies that had been generally well supported in consultation. Our Assistant Commissioners considered that retaining the proposed name of Hitchin was preferable, as they considered both Stotfold and Shefford too small to be referenced and, while the three Bedfordshire wards included in the constituency are in a different county to Hitchin, many of the electors in these wards would likely see the Hertfordshire towns of Hitchin and Letchworth as their biggest local towns. They therefore considered that the name Hitchin alone is suitably representative. We agreed and proposed no change.
226. Although we acknowledged the opposition to the proposed transfer of the three wards of Hertford Heath, Great Amwell, and Stanstead Abbots to the proposed Broxbourne constituency, due to the tight electorate figures in this area, we noted that any attempt to retain these wards in the Hertford and Stortford constituency would require a radical reconfiguration across a number of constituencies. For example, a counter proposal retained these three wards in a constituency with the town of Hertford, but only by splitting the towns of Hertford and Bishop's Stortford into two different constituencies, with changes required to constituencies across much of Hertfordshire. We considered that such a reconfiguration in this area was not warranted, and we proposed no change to the Hertford and Stortford, or Broxbourne constituencies.
227. As the initial proposals for the remainder of the constituencies in Hertfordshire – North East Hertfordshire, Stevenage, Watford, and Hemel Hempstead – did not elicit a large number of representations, and were largely uncontroversial, we proposed no further alterations to these constituencies.

### **Consultation on the revised proposals**

228. Relatively few representations were received for the constituencies of: Hitchin; North East Hertfordshire; Stevenage; Welwyn Hatfield; Hertford and Stortford; Hemel Hempstead; Watford and South West Hertfordshire, and those that were received were generally in support, with no significant new issues.

229. There remained some opposition to the inclusion of the Northaw & Cuffley ward in the Hertsmere constituency, but there was overwhelming support for the name of the proposed Three Rivers constituency to return to the name South West Hertfordshire
230. There continued to be significant opposition to the St Albans constituency, mostly with renewed calls for the Jersey Farm area to be included in St Albans, although no significant new evidence or counter proposals were received. There was very little opposition to the Harpenden and Berkhamsted constituency, with some representations saying our proposals were better than the existing Hitchin and Harpenden constituency. One representation, however, suggested including the Kimpton ward in Harpenden and Berkhamsted, to allow Sandridge to be included in St Albans, despite this creating an orphan ward. There were some new arguments for the constituency to be renamed North West Hertfordshire. Approximately 20 representations were received in opposition to the Broxbourne constituency, with around ten received that were still in opposition to the proposed Hertsmere constituency, but no new significant issues were raised in the representations. Generally, apart from the issue of the Sandridge ward and Jersey Farm area, the revised proposals generated relatively little opposition.

### **Final recommendations**

231. We noted the overwhelming support for the name of the proposed Three Rivers constituency to return to the name South West Hertfordshire
232. We noted that we had received some opposition to our revised proposals and therefore investigated the alternatives. However, we also noted that, in general, our revised proposals had generated relatively little opposition. There remained some opposition to the inclusion of the Northaw & Cuffley ward in the Hertsmere constituency, and more notably, opposition to our proposals to include the Sandridge ward in the Harpenden and Berkhamsted constituency. Much of this opposition continued to come from the Jersey Farm area, in particular. We considered again the representation suggesting the inclusion of the Kimpton ward in the Harpenden and Berkhamsted constituency, to allow the Sandridge ward to be included in St Albans constituency, despite this counter proposal creating an orphan ward. While we acknowledge the evidence of the close links of the Jersey Farm area with St Albans we are not persuaded that compelling evidence has been received to transfer the Kimpton ward. Our investigations identified that, to include either the whole or part of the Sandridge ward in the St Albans constituency, without other changes, would result in the Harpenden and Berkhamsted constituency falling below the permitted electorate range. We further investigated alternative splits of the Sandridge ward, but considered these would require dividing the Jersey Farm area between constituencies. There was otherwise very little opposition to the Harpenden and Berkhamsted constituency. However, there were some new arguments for the constituency to be renamed North West Hertfordshire.
233. Having considered all the evidence received and the general level of support that our proposals had garnered, we are not persuaded to modify our revised proposals in the county. We consider that a modification to the St Albans, and Harpenden and Berkhamsted constituencies would not provide for a pattern of constituencies in other parts of the county that best reflected the statutory criteria.
234. Our final recommendations for Hertfordshire are therefore for constituencies of: Broxbourne; Harpenden and Berkhamsted; Hemel Hempstead; Hertford and Stortford; Hertsmere; Hitchin; North East Hertfordshire; South West Hertfordshire; St Albans; Stevenage; Watford; and Welwyn



Hatfield. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## Cambridgeshire

### Initial proposals

235. Of the seven existing constituencies in Cambridgeshire, only Peterborough was within the permitted electorate range. The remaining six constituencies were all above the range. Therefore, as set out earlier in our report, Cambridgeshire was allocated eight constituencies in formulating the initial proposals, which largely resulted in significant changes to the existing pattern of constituencies.
236. In formulating our initial proposals, we retained the existing Peterborough constituency broadly unchanged, proposing the boundary be realigned with new local government wards. We identified when formulating our initial proposals that it was possible to configure the Peterborough constituency in a different manner, albeit significantly altered from the existing constituency, and sought views on this alternative during consultation on our initial proposals.
237. We proposed a North East Cambridgeshire constituency, that would be coterminous with the District of Fenland, no longer including the District of East Cambridgeshire wards of Downham Villages, Littleport, and Sutton. We proposed that these three wards be included in a reconfigured East Cambridgeshire constituency, along with all the other District of East Cambridgeshire wards, and the two District of South Cambridgeshire wards of Cottenham, and Milton & Waterbeach.
238. In order to bring the Cambridge constituency within the permitted range, we proposed that the City of Cambridge ward of Cherry Hinton be included in the South Cambridgeshire constituency, to join the City of Cambridge ward of Queen Edith's already in the latter constituency. In formulating our initial proposals, we identified that either ward of Cherry Hinton or Trumpington could be included in the South Cambridgeshire constituency and specifically sought views on this possible alternative during the consultation on the initial proposals.
239. We proposed further changes to the South Cambridgeshire constituency, namely to include the District of South Cambridgeshire wards of Balsham, Fen Ditton & Fulbourn, and Linton in the constituency, and transferred the eight northern wards of the District to our proposed St Neots constituency, which was also proposed to take the District of Huntingdon wards covering the town of St Neots and village of Fenstanton from the existing Huntingdon constituency. In turn, we proposed transferring the wards of Holywell-cum-Needingworth, Sawtry, Somersham and Warboys from the existing North East Cambridgeshire constituency into our proposed Huntingdon constituency, thereby bringing both the Huntingdon and North East Cambridgeshire constituencies within the permitted electorate range.

### Consultation on the initial proposals

240. We received a significant number of representations commenting on our initial proposals for Cambridgeshire. The majority of these were in regard to our proposed Peterborough and North West Cambridgeshire constituencies. We received a counter proposal that suggested these two constituencies be reconfigured to form Peterborough North and Peterborough South constituencies. A large number of representations were received in support of this counter

proposal, with respondents citing that a constituency crossing the River Nene was not an issue. However, we also received a significant number of representations in opposition to this counter-proposal, with respondents saying that they considered this counter proposal broke local ties in the City of Peterborough and that the River Nene provided an easily identifiable boundary. We received some other counter proposals for the Peterborough area, which generally sought to configure a more compact and urban-focused Peterborough constituency.

241. We received some other representations commenting on our proposed North West Cambridgeshire constituency. Some of these considered the constituency should be renamed to include a reference to the City of Peterborough, given the constituency included a number of electors from the City. We also received some representations that considered our proposed North West Cambridgeshire and Huntingdon boundary would break close ties between 'the Giddings' villages of Great Gidding, Little Gidding, Steeple Gidding and Hamerton. We received a counter proposal that suggested dividing the Alconbury ward in order for all the above villages to be included in the North West Cambridgeshire constituency.
242. In the City of Cambridge, we received a mixture of support and opposition to our initial proposals, with a number of respondents proposing alternative configurations. We received a large number of competing representations, arguing for the inclusion of one or other of the Cherry Hinton, Queen Edith's or Trumpington wards in the Cambridge constituency. While the Queen Edith's ward is not included in the existing Cambridge constituency, some respondents considered this broke community ties in the area, particularly as the ward included local facilities and services such as Homerton College and Addenbrooke's Hospital. Evidence in relation to strong community ties to Cambridge was, however, also received in relation to the Cherry Hinton and Trumpington wards: Cherry Hinton had a long association with Cambridge and was home to a number of cultural events, while Trumpington was highlighted as the site of significant development and therefore presented a more continuous urban character flowing from the city centre. We also received other counter proposals for Cambridge that proposed the City be split into two constituencies with the surrounding rural areas.
243. We received some representations that were concerned that our proposed East Cambridgeshire constituency was discontinuous due to a small part of the Milton & Waterbeach ward being detached from the constituency. Some respondents sought to resolve this matter in counter proposals, through either reconfiguring constituencies or splitting the Milton & Waterbeach ward.
244. We received approximately 200 representations commenting on our proposed St Neots constituency. Some of these representations were supportive of our proposal. However, we also received opposition to the configuration of the constituency, particularly that it included wards from the District of South Cambridgeshire. Respondents stated that residents in these wards shared few community ties with St Neots, but instead had connections with other parts of South Cambridgeshire and the City of Cambridge itself. Counter proposals either suggested a St Ives constituency or a reconfiguration of a number of constituencies in the south of the county. We also received a number of representations that commented on the proposed constituency name of St Neots. Many of these considered that the name of the constituency was not representative and proposed alternatives such as Mid Cambridgeshire or West Cambridgeshire.

245. The majority of representations received in relation to our proposed North East Cambridgeshire and Huntingdon constituencies were supportive. In the case of the former constituency, however, there were requests to rename it as Fenland or the Fens.

### **Revised proposals**

246. Our Assistant Commissioners considered the evidence received in relation to our proposed Peterborough and North West Cambridgeshire constituencies. They noted that a number of respondents supported the alternative proposal we had aired in the initial proposal report. These representations considered that the existing configuration of the Peterborough constituency was confusing. However, they also noted the significant number of representations that supported our initial proposals and opposed the alternative. Given the conflicting evidence received, the Assistant Commissioners decided to visit the area. From their observations they considered that the alternative pattern would divide the centre of Peterborough between constituencies, breaking local ties in the city centre. They also considered that, given the existing Peterborough constituency only required minimal change, the alternative presented significant disruption. They therefore proposed no changes to the initial proposals for Peterborough and North West Cambridgeshire. They were also not persuaded to amend the name of the proposed North West Cambridgeshire constituency, as they considered this name reflected the geographic extent of the constituency.
247. They reflected on the evidence received that the initial proposals would break community ties in the Giddings. They investigated the counter proposals received, noting that the issue could be addressed by the transfer of the Alconbury ward to the North West Cambridgeshire constituency. However, they considered this configuration resulted in the aforementioned constituency and Huntingdon being unsatisfactory. They also identified that the Alconbury ward could be split between constituencies. However, they were not persuaded to recommend this proposal given the splitting of the ward in this instance provided no wider benefit to the pattern of constituencies in the county.
248. The Assistant Commissioners considered the competing arguments concerning the proposed Cambridge constituency. They noted that cases had been proposed for including each of the Cherry Hinton, Queen Edith's and Trumpington wards. They were not persuaded to include the Queen Edith's ward in the Cambridge constituency, particularly as it was not part of the existing configuration. Having considered all the evidence presented in relation to the other two wards, they noted that Cherry Hinton shared community ties with Queen Edith's and felt that the inclusion of both wards in the proposed South Cambridgeshire constituency was better than the existing arrangement. They also noted the new developments in the Trumpington ward and considered that the ward was a better fit in an urban constituency than in rural South Cambridgeshire. Our Assistant Commissioners therefore recommended no change to either of the proposed Cambridge or South Cambridgeshire constituencies.
249. Our Assistant Commissioners assessed the evidence received in relation to the inclusion of the Milton & Waterbeach ward in the East Cambridgeshire constituency. They noted that the majority of the representations commented that this part of this ward was detached from the remainder of the constituency. Having considered the evidence, they were of the view that, while we would usually attempt to avoid such situations, there is no specific statutory factor regarding contiguous constituencies, and in this area in particular it is less relevant, as the issue is caused by an already

non-contiguous ward – as created by the Local Government Boundary Commission for England – which also follows the local authority boundaries. They were therefore not minded to revise the proposed constituency.

250. The Assistant Commissioners considered the conflicting evidence received in relation to the proposed St Neots constituency. They were not minded to adopt any of the counter proposals received, as they considered these resulted in significant disruption to the pattern of constituencies in large parts of the county, for which we had received support during consultation. However, they did consider that the proposed name of St Neots did not adequately reflect the extent of the constituency. They therefore proposed the constituency be renamed St Neots and Mid Cambridgeshire.
251. Our Assistant Commissioners noted that the majority of representations received in relation to the proposed Huntingdon and North East Cambridgeshire constituencies were supportive. They noted the alternative names proposed for the North East Cambridgeshire constituency, but were not persuaded that the alternatives of Fenland or the Fens would be more representative. They therefore proposed no change to either constituency.
252. Having considered the evidence received, we agreed with the recommendations of the Assistant Commissioners. Therefore, the boundaries of our revised proposals were identical to those previously proposed, with the only change being the revised name of St Neots and Mid Cambridgeshire.

### **Consultation on the revised proposals**

253. In response to the consultation on the revised proposals we again received representations in relation to our proposed North West Cambridgeshire and Peterborough constituencies. The majority of representations in relation to the North West Cambridgeshire constituency were positive, particularly as it had only been minimally changed from the existing constituency. However, some opposition was received, including repeated concerns that the southern boundary of the constituency would split the Giddings villages between constituencies. We also received some representations that suggested the North West Cambridgeshire constituency should be renamed as North Huntingdonshire, or include a reference to Peterborough in the constituency name, such as West Peterborough and Ramsey.
254. Our proposed Peterborough constituency again received a mixed response during consultation. Those who opposed the configuration repeated concerns that the area to the north of the River Nene in the Fletton & Woodston ward was not included in the constituency. We received a counter proposal to resolve this, which suggested transferring the Fletton & Woodston ward to the Peterborough constituency, and the Eye, Thorney & Newborough ward to the North West Cambridgeshire constituency.
255. We received over 100 representations in opposition to our proposed St Neots constituency. A number of these respondents put forward similar arguments to earlier consultations that the constituency did not reflect community ties. We also received a counter proposal, which suggested a reconfigured St Neots constituency that would cross the county boundary and include wards from North East Bedfordshire, which was stated to better reflect community ties and the local growth of the area. We also received some representations that commented on the

proposed constituency name. While some were supportive, we received alternatives such as West Cambridgeshire, Mid Cambridgeshire, or Mid Cambridgeshire and St Neots.

256. In the City of Cambridge, we again received representations commenting on which of the Cherry Hinton, Queen Edith's and Trumpington wards should be included in the constituency. As at previous consultations, we received some support for the inclusion of Trumpington ward.
257. We generally received few representations commenting specifically on our proposed constituencies of East Cambridgeshire, Huntingdon, North East Cambridgeshire, and South Cambridgeshire. However, among those, we received a representation requesting we rename East Cambridgeshire as Ely and East Cambridgeshire to reflect the prominence of the town in the constituency, and to also reflect consistency with our proposed St Neots and Mid Cambridgeshire constituency. There was also a request that North East Cambridgeshire be renamed North Cambridgeshire.

### **Final recommendations**

258. We again note the competing evidence received in relation to our proposed North West Cambridgeshire and Peterborough constituencies. We investigated the proposal that sought to transfer the Fletton & Woodston ward to the Peterborough constituency, and the Eye, Thorney & Newborough ward to the North West Cambridgeshire constituency. We are not persuaded by the evidence received to adopt this proposal. We are particularly concerned that it would result in the North West Cambridgeshire being geographically odd in shape, given it would wrap around the northern part of Peterborough. We again considered the representations in relation to the division of the Giddings villages by the southern boundary of the North West Cambridgeshire constituency. We acknowledge the concerns of many of those who live in the villages of 'The Giddings' – namely Great Gidding; Little Gidding; Steeple Gidding; and Hamerton – that these communities would be separated by our proposals. However, we noted that the Alconbury ward boundary followed the civil parish boundary between the Little Gidding, and the Hamerton and Steeple Gidding civil parishes, and we did not consider that splitting the Alconbury ward would be justified given the lack of any identifiable wider benefits elsewhere in the region, or the county. We were not, therefore persuaded to alter our revised proposals with regard to 'The Giddings'. Finally, we are not minded to amend the name of either the Peterborough or North West Cambridgeshire constituencies. We consider the names of both are representative of the areas represented in each.
259. We have considered the representations and counter proposal received in relation to the St Neots constituency. The counter proposal did not follow local government wards, would cross the county boundary, and would thereby significantly disrupt the pattern of constituencies in Bedfordshire, which had generally been supported. We are therefore not minded to modify the boundaries of the proposed constituency. We are also not minded to modify the name of the proposed constituency, as we consider St Neots and Mid Cambridgeshire to adequately reflect the geography of the constituency.
260. We again noted the competing evidence received in relation to our proposed Cambridge and South Cambridgeshire constituencies, but in the absence of any persuasive new arguments or evidence being presented, we are not minded to modify our proposals. We consider that including the Cherry Hinton ward in the Cambridge constituency instead of the Trumpington ward would likely break community ties between Cherry Hinton and Queen Edith's.

261. We note that our proposed constituencies of East Cambridgeshire, Huntingdon, and North East Cambridgeshire were all generally supported during the revised proposal consultation. However, we are minded to change the name of our proposed East Cambridgeshire constituency to Ely and East Cambridgeshire. We consider this name would better reflect the area encompassed by the constituency.
262. Our final recommendations for Cambridgeshire are therefore for constituencies of: Cambridge; Ely and East Cambridgeshire; Huntingdon; North East Cambridgeshire; North West Cambridgeshire; Peterborough; St Neots and Mid Cambridgeshire; and South Cambridgeshire. These constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.

## **Norfolk and Suffolk**

### **Norfolk**

#### **Initial proposals**

263. Of the nine existing constituencies in the county, three (Great Yarmouth, North West Norfolk, and Norwich South) were within the permitted electorate range. Two constituencies (Norwich North and North Norfolk) were below, and four constituencies (Broadland, Mid Norfolk, South Norfolk, and South West Norfolk) were above. In formulating our initial proposals we proposed changes to all constituencies in the county, but in the case of the North West Norfolk constituency we only proposed changes to realign the constituency boundary with new local government wards.
264. We noted that, while the existing Great Yarmouth constituency was within the permitted electorate range, we considered that retaining this constituency unchanged would result in an overall pattern of constituencies across the county that would not best reflect the statutory factors. We therefore proposed to include the District of North Norfolk wards of Hickling and Stalham in a reconfigured Great Yarmouth constituency. This change resulted in the North Norfolk constituency falling below the permitted electorate range, so we proposed that the wards covering the town of Fakenham be included in a reconfigured North Norfolk constituency.
265. In Norwich, we proposed that the City of Norwich ward of Thorpe Hamlet be included in the Norwich North constituency, and the District of South Norfolk wards of New Costessey and Old Costessey be included in the Norwich South constituency.
266. We proposed the Mid Norfolk constituency include the District of South Norfolk ward of Easton, which resulted in the South Norfolk constituency being within the permitted electorate range. We proposed to extend the Mid Norfolk constituency further south to take three wards from the South West Norfolk constituency, while transferring the wards of Lincoln and Upper Wensum to our proposed Broadland constituency, and three wards to our proposed South West Norfolk constituency. These changes ensured that the Broadland, Mid Norfolk, South Norfolk and South West Norfolk constituencies were all within the permitted electorate range.

#### **Consultation on the initial proposals**

267. The issue in Norfolk that received the most representations was the proposed transfer of the two North Norfolk wards of Stalham and Hickling to the Great Yarmouth constituency. The existing

Great Yarmouth constituency did not need to be changed and this arrangement had been considered necessary if Norfolk was to be treated as a sub-region on its own, in order to create a coherent pattern of constituencies across the county. The majority of representations stated that the two wards were very different from the rest of the Great Yarmouth constituency and highlighted the differences in physical geography between the rural areas of these wards and the urban area of Great Yarmouth.

268. Few representations were received regarding the transfer of wards including the town of Fakenham from Broadland to North Norfolk constituency, although those that were received were largely supportive, saying that the town of Fakenham was one of the largest towns in the North Norfolk local authority, and that the five wards proposed to transfer had little in common with the rest of the existing Broadland constituency in which they are currently located.
269. While there were only a small number of representations regarding the two proposed Norwich constituencies, they presented robust views and evidence. Some representations supported the initial proposals, claiming that much of the Thorpe Hamlet ward is north of the river and therefore has more connection to the Norwich North constituency, and that this change meant the boundary between the two constituencies more closely followed the River Wensum. Conversely, opposing representations stated that the Thorpe Hamlet ward contains crucial areas of the city centre, such as the railway station, the football stadium, one of the cathedrals, and numerous shops, restaurants and other facilities, and the area therefore had much closer ties with the rest of the city centre contained in the proposed Norwich South constituency. A number of counter proposals therefore supported the Thorpe Hamlet ward being retained in the Norwich South constituency, and the Old Costessey ward being retained in the South Norfolk constituency. In order to achieve the necessary changes to electorate numbers to bring both constituencies within the permitted range, different counter proposals stated that either the two wards of Drayton North and Drayton South, or the ward of Spixworth with St. Faiths should be included in Norwich North.
270. Very few representations were received regarding the proposed South West Norfolk, Mid Norfolk, and South Norfolk constituencies, and there was no discernible groundswell of opposition to our initial proposals for these areas. Our proposed North West Norfolk constituency elicited few representations, and those received were mostly supportive.
271. While there was some support for the proposed sub-regions, many respondents said that Norfolk should be grouped with Suffolk to create a sub-region and that Essex should be the county to stand alone as a separate sub-region. It was claimed that this would have multiple benefits, though requiring some degree of change to constituencies in the south of Norfolk.
272. Most of the counter proposals stating that Norfolk be paired with Suffolk proposed a constituency crossing between the two counties over eastern reaches of the River Waveney, with slight variations. They considered that such a constituency would be a more coherent cross-county boundary constituency than the initially proposed Haverhill and Halstead constituency (between Essex and Suffolk), with established community ties, a shared local identity, and good transport links. One such counter proposal proposed a cross-county Waveney Valley constituency that would include the following wards from the existing South Norfolk constituency: Bressingham & Burston; Diss & Roydon; Beck Vale; Dickleburgh & Scole; Harleston; Bunwell; and Ditchingham & Earsham. The proposed Waveney Valley constituency is discussed in further detail in the

section on Suffolk below, as the majority of the proposed constituency would be composed of Suffolk wards.

273. However, support for a sub-region of Norfolk and Suffolk and having the constituency crossing the county boundary in the east was not unanimous. Some counter proposals suggested combining Norfolk, Suffolk and Essex together in a single sub-region. There were also counter proposals that, should we be minded to consider a Suffolk-Norfolk sub-region, a cross-county boundary constituency including the towns of Newmarket and Thetford should be created. It was claimed that such a constituency would bring more of The Brecks (which crosses the county boundary) together, including Thetford Forest and the closely-linked towns of Brandon and Thetford, and the constituency would cross the county boundary where the river is a less significant boundary than it is nearer the coast.

### **Revised proposals**

274. Having considered all the issues and reflected on the evidence received, our Assistant Commissioners accepted the rationale and the benefits contained in the counter proposals for altering the sub-regional grouping to instead join Norfolk and Suffolk as a sub-region, and treat Essex alone. They recommended that there be a Waveney Valley cross-county boundary constituency between the counties of Norfolk and Suffolk, having been persuaded of the strong local ties, shared local identity, and good transport links. While they considered that a cross-county boundary constituency including the towns of Newmarket and Thetford had merit, they considered that such a constituency necessitated more disruption to the existing constituencies than a Waveney Valley constituency, and would also be unsatisfactory due to including the Suffolk town of Newmarket, with its close geographical proximity and local ties to Cambridgeshire, in a constituency with areas of Norfolk.
275. We accepted the recommendation of the Assistant Commissioners and therefore proposed that Norfolk and Suffolk be combined to form a sub-region and Essex form a stand-alone sub-region. The change in sub-regions necessitated change to the initial proposals across much of Norfolk (eight of the nine proposed constituencies), but less significant change to existing constituencies across the sub-region as a whole.
276. Our Assistant Commissioners noted that the change in sub-region allowed the two wards of Stalham and Hickling to be retained in the North Norfolk constituency, while still allowing for a coherent pattern of constituencies across the county. This allowed the Great Yarmouth constituency to be both wholly unchanged and remain coterminous with the local authority boundary. We agreed with this recommendation and proposed that the Stalham and Hickling wards be retained in the North Norfolk constituency, and that the Great Yarmouth constituency be unchanged from the existing arrangement.
277. As a consequence of the changes elsewhere in Norfolk, our Assistant Commissioners recommended to us that the five wards that comprised Fakenham and the surrounding areas be retained in the Broadland constituency. We acknowledged that a majority of respondents supported the initially proposed transfer of these five wards to the North Norfolk constituency, but we agreed with our Assistant Commissioners and considered that retaining them in the Broadland constituency would minimise disruption to the existing arrangement for both the North Norfolk and Broadland constituencies. The other change to the boundaries of the existing Broadland constituency was for the wards of Drayton North and Drayton South to be included in the Norwich



North constituency (detailed below). However, our Assistant Commissioners were persuaded by a proposal for a change of name for the constituency name. Taking account of the views given in consultation, they felt that the name Broadland was not reflective of the constituency as a whole, and that, as Fakenham is an important town in the area, and one that is in the North Norfolk local authority rather than the Broadland local authority, this town should be included in the name. We agreed with this, and therefore proposed the constituency name be changed to Broadland and Fakenham.

278. During their site visit to the area, the Assistant Commissioners agreed that the ward of Thorpe Hamlet did contain a significant portion of the city centre, and that to include it in the Norwich North constituency, as initially proposed, while having some benefits, would divide the city centre between two constituencies, with many city centre landmarks and services being included in a constituency that is more suburban in character than the Norwich South constituency. They therefore recommended that we retain the Thorpe Hamlet ward in the Norwich South constituency, as in the existing arrangement. We agreed with that recommendation and revised our proposals to incorporate this change.
279. The Assistant Commissioners then considered which wards should be included in Norwich North instead. During their visit, they observed that, despite the odd shape of the two Drayton wards, there were good transport links to the Norwich North constituency, and a similarly suburban character across both areas. The peculiar shape of the two wards was largely due to their alignment with the boundary of Drayton Parish Council, and the areas of particular concern had few or no inhabitants. Conversely, the Spixworth with St. Faiths ward was almost entirely rural and the A1270 road separated much of the ward from the Norwich North constituency. They noted the historical precedent for the village of Drayton being included in a Norwich North constituency and therefore recommended that the two Drayton wards be included in the Norwich North constituency. We accepted that recommendation and revised our proposals, but considered that our decision was finely balanced, as we noted that the new constituency boundary may be considered to break ties between Drayton and the neighbouring village of Taverham, as well as seemingly dividing the Thorpe Marriott residential area. We also noted that, despite the apparent physical barrier of the A1270, there appeared to be good direct road access from the main population centre of Spixworth village in the Spixworth with St. Faiths ward into north Norwich by both Buxton Road and North Walsham Road. We therefore particularly welcomed further views and evidence in the responses to our revised proposals, especially from local residents, as to which of these wards would be best included in the Norwich North constituency.
280. Following the site visit by our Assistant Commissioners, and the evidence that supported the argument for a cross-county boundary constituency with Suffolk, we accepted their recommendations for a Waveney Valley constituency. The inclusion of the six Norfolk wards, as suggested in a counter proposal, in the Waveney Valley constituency meant that the South Norfolk constituency required additional electors from elsewhere. In accordance with the recommendations of our Assistant Commissioners, we proposed that the Old Costessey ward, included in the initially proposed Norwich South constituency, and the Easton ward, included in the initially proposed Mid Norfolk constituency, both be retained in the South Norfolk constituency, as in the existing arrangement. Furthermore, as set out in numerous counter proposals, we accepted the recommendations of our Assistant Commissioners and proposed that the town of Wymondham (comprising the Central Wymondham, North Wymondham and South

Wymondham wards) – part of the existing Mid Norfolk constituency – be included in the South Norfolk constituency. While not currently included in the existing South Norfolk constituency, Wymondham is in the South Norfolk local authority and, while few representations were received regarding this area, there was support for Wymondham being included in a constituency composed exclusively of other South Norfolk local authority wards. Wymondham is the largest town in the South Norfolk local authority, and is considered to have strong links to other areas in the constituency.

281. The changes we proposed to the South Norfolk and Broadland constituencies had a consequential beneficial impact – in terms of the statutory factors – on both the Mid Norfolk and South West Norfolk constituencies. The Mid Norfolk constituency would now retain the wards of: Necton; Launditch; Hermitage; Upper Wensum; and Lincoln (which are all in the existing constituency of Mid Norfolk). The wards of Harling & Heathlands, and Giltcross, would also be retained in the South West Norfolk constituency, as in the existing arrangement. Our revised proposals therefore allowed both constituencies to much more closely resemble their existing configurations, with the South West Norfolk constituency only being changed from the existing boundary to realign to new local government ward boundaries.
282. As the North West Norfolk proposed constituency elicited few representations, and was largely uncontroversial and mostly supported, we proposed no change to this constituency as initially proposed.

### **Consultation on the revised proposals**

283. In our revised proposals, the constituencies in Norfolk were considerably changed following the adoption of the new Norfolk-Suffolk sub-region. There were very few representations – largely supportive – regarding the proposed return of the Stalham and Hickling wards from Great Yarmouth to North Norfolk constituency. Very few representations were received relating to elsewhere in the proposed North Norfolk constituency, with no new key issues.
284. Approximately 100 representations were received, however, regarding the Broadland constituency, most of which concerned the proposed return to that constituency of the five wards comprising the town and area around Fakenham. These representations were split between those supporting or opposing the revised proposals. Those supporting were largely from the Spixworth with St. Faiths ward, who were opposing the counter proposals that had been submitted to include the ward in the Norwich North constituency. Those in opposition were mostly disappointed that Fakenham would no longer be included in North Norfolk as it had been in the initial proposals. Few comments were received regarding the constituency name change.
285. Few representations were received regarding the North West Norfolk, South West Norfolk, and Mid Norfolk constituencies. Most of the opposition to the South Norfolk constituency was with regard to the proposed cross-county boundary Waveney Valley constituency.
286. In relation to Norwich, over 100 representations were received, mostly with regard to the Norwich North constituency. Those in support considered that the Drayton wards are a better fit in Norwich North and opposed the other main alternative – the inclusion the Spixworth with St. Faiths ward – whereas those in opposition argued that Drayton is linked to Taverham (in particular the Thorpe Marriott area, which lies in both the Drayton North and Taverham North wards) and does not have good community ties to Norwich. We received counter proposals to split the Thorpe

Hamlet ward, but this would result in Broadland and Fakenham being just a few electors over the permitted range if it included both Drayton wards, and was otherwise unchanged from the revised proposals. Another counter proposal that would keep Norwich similar to the initial proposals was received, but this required consequential changes across the county.

287. Very few representations were received regarding Norwich South. There was support in the representations for the revised proposals retaining the Thorpe Hamlet ward in the constituency, although others argued that its links are to Norwich North.
288. More than 80 representations were received regarding the cross-county proposed Waveney Valley constituency. Although there was some support, the majority, by far, were in opposition. Most of these were very similar, claiming that the constituency is geographically too large, and combined too many local authorities. The representations claimed that there is no link between the various areas, especially in areas even a few miles away from the River Waveney. Others said that local ties of villages in Suffolk would be split, particularly Stowupland (Haughley, Stowupland & Wetherden ward) from the town of Stowmarket. We received a request for the constituency to be renamed Eye and Diss.

### **Final recommendations**

289. We have again considered the evidence received in relation to our proposed constituencies in Norfolk. We recognised that we had received some opposition to our revised proposals and therefore investigated the alternatives.
290. We received no significant new evidence supporting changes to our revised proposals for most of the constituencies in Norfolk, and therefore propose no alterations to the following constituencies: Broadland and Fakenham; North Norfolk; Great Yarmouth; Mid Norfolk; North West Norfolk; South Norfolk; and South West Norfolk.
291. With regard to Norwich, although it would be possible to exchange the two Drayton wards with the Spixworth with St. Faiths ward, it would not be possible to include the Drayton North ward alone in Broadland and Fakenham with no other changes, as this would leave Norwich North below the permitted electorate range. It would be possible to include the Drayton North ward in Broadland and Fakenham, with Spixworth with St. Faiths being included in Norwich North, but this would divide the two Drayton wards between constituencies and would still not resolve the issue of the odd shape of the Norwich North constituency. Including the two Drayton wards in Broadland and Fakenham, and splitting the Spixworth with St. Faiths ward along the A1270 would also not resolve the issue, as there are not enough electors in the area south of the road to bring Norwich North up to within the permitted range. A potential solution could be for a split ward in Norwich. However, as noted above, a split of the Thorpe Hamlet ward would leave the Broadland and Fakenham constituency including both Drayton wards above the permitted electorate range, and no other ward had been identified as being suitable for splitting at this stage. The only other alternative would appear to be a complete reconfiguration of the constituencies in Norfolk that had previously been considered. A return to the initial proposals would not be possible without decoupling Norfolk and Suffolk (the revised sub-region has been largely welcomed over the initial proposals' sub-region), with widespread consequences across the whole Eastern region. We therefore propose that there be no further revision to the Norwich North and Norwich South constituencies.

292. We noted that the cross-county boundary constituency is a consequence of the changes made to the sub-regions, which have been supported by others, and the arguments for which convinced both the Assistant Commissioners and us as the best solution for the region as a whole. We remain of the view that the sub-regions as set out in the revised proposals enable a pattern of constituencies that is superior to the initial proposals when set against the statutory factors. We have also seen no alternative proposal for either different sub-regions or a different constituency crossing the Norfolk-Suffolk boundary that would not require greater disruption across the region in terms of changes to existing constituencies and breaking of multiple local ties. We therefore do not propose to amend the sub-regions or change the proposed constituency crossing the county boundary (detailed below).
293. Our final recommendations for Norfolk (except for the constituency shared with Suffolk) are therefore for constituencies of: Broadland and Fakenham; Great Yarmouth; Mid Norfolk; North Norfolk; North West Norfolk; Norwich North; Norwich South; South Norfolk; and South West Norfolk. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## **Suffolk**

### **Initial proposals**

294. Of the existing constituencies in Suffolk, two (Ipswich and South Suffolk) are within the permitted electorate range: the other constituencies in the county are all above. In formulating our initial proposals, we retained the Ipswich constituency unchanged and only modified the South Suffolk constituency to reflect new local government wards.
295. As noted above, we initially proposed that Essex and Suffolk form a sub-region, with a cross-county boundary constituency of Haverhill and Halstead, which included 13 District of West Suffolk wards (including the town of Haverhill) and ten District of Braintree wards (including the town of Halstead).
296. We proposed a Bury St Edmunds and Newmarket constituency, which included 25 District of West Suffolk wards, including both towns. We proposed a North Suffolk constituency, which comprised wards from the District of West Suffolk, District of Mid Suffolk and District of East Suffolk. The Suffolk Coastal constituency would transfer two wards to North Suffolk, but was otherwise changed only to realign with new local government wards. In the north of the county, we proposed a Lowestoft constituency, which comprised nine District of East Suffolk wards, including those encompassing Lowestoft. Finally, we proposed an Ipswich North and Stowmarket constituency. Rather than expanding north to the county boundary, the constituency was proposed to extend to the northern boundary of the Stoneham ward and westwards to include the towns of Stowmarket and Needham Market.

### **Consultation on the initial proposals**

297. As described in previous sections, there was significant opposition to the sub-regions as initially proposed. While there was also some support for them, many respondents said that joining Norfolk with Suffolk, and having Essex as a stand-alone sub-region, would have multiple benefits and allow for a potentially better solution regarding local ties in a number of areas.

298. The largest single issue in Suffolk, by number of representations received, was the proposed Haverhill and Halstead cross-county boundary constituency between Suffolk and Essex. Almost all of the representations received regarding this constituency were in opposition, with representations highlighting the lack of ties between the two towns, and particularly poor public transport links, which were said to be effectively non-existent. We also received evidence that many of the West Suffolk local authority wards that would be included in the constituency look towards the towns of Newmarket or Bury St Edmunds and not south to Essex, while the Braintree local authority wards included look mostly towards the town of Braintree and not to Suffolk in the north. Other evidence pointed to the River Stour as a well-defined physical barrier.
299. Many of those who opposed the proposed Haverhill and Halstead constituency, supported instead a new sub-region pairing Suffolk with Norfolk, and generally supported one of two options to achieve this: either a Waveney Valley constituency in the east, or a Newmarket and Thetford constituency in the west. The rationale put forward in support of a Waveney Valley constituency was that it would better reflect the statutory factors, and that there is a shared local character on both sides of the River Waveney, with the river being a uniting factor rather than a division, and that the A143 road provides a strong transport connection aligned with the largely east–west orientation of the proposed constituency. The reasons given in support of a Newmarket and Thetford constituency were that it would bring much of The Brecks into a single constituency, including Thetford Forest and the closely-linked towns of Brandon and Thetford, and the constituency would cross the county boundary where the river is a less significant boundary than it is further downstream nearer the coast. Some responses observed, however, that creating a crossing in the east also offered two options, with slightly different configurations. One counter proposal in particular would result in less change. In this, the town of Stowmarket would be included in the Bury St Edmunds constituency, as in the existing arrangement, thereby minimising disruption to the existing constituencies and moving significantly fewer electors. This counter proposal also allowed for the towns of Wickham Market and Framlingham, two areas with close community ties, to remain in a constituency together. It also proposed a Central Suffolk and North Ipswich constituency which, despite some changes from the existing arrangement, would be more closely aligned to the existing constituency than either the initial proposals or some of the other counter proposals. Some responses said a Newmarket and Thetford constituency would cause more disruption to existing constituencies across both Norfolk and Suffolk. Furthermore, a number of representations were received from residents of Newmarket who stated that they should, in fact, be included with Cambridgeshire and not Suffolk, and therefore to include the town in a cross-county boundary constituency with Norfolk instead would go directly against local sentiment and cause even more disruption and confusion than the existing arrangement.
300. We also received counter proposals that proposed combining Norfolk, Suffolk and Essex together in a single sub-region. This would require an extra, unnecessary cross-county boundary constituency, and as such is considered to be less strongly reflective of the statutory factors than the initial proposals and the other counter proposals received during the two consultations.
301. Those supporting a Waveney Valley constituency identified that it would also allow the ward of Kelsale & Yoxford to remain in the Suffolk Coastal constituency, linking it to the town of Saxmundham and to other areas with which it has community ties. Finally, the Risby ward would be retained in a West Suffolk constituency, thereby moving fewer electors from their existing constituency, giving the constituency a better shape, and more coherence than other counter proposals.

302. Relatively few representations regarding our initially proposed Bury St Edmunds and Newmarket constituency were received, although they were almost exclusively in opposition and drew attention to the fact that both the existing West Suffolk and Bury St Edmunds constituencies were significantly reconfigured in the initial proposals, with the existing Bury St Edmunds constituency in particular being divided between four proposed constituencies. Furthermore, the initial proposals would result in areas like Rougham and Stowmarket being separated from Bury St Edmunds, with which they were said to have strong community ties. Many counter proposals utilising a Norfolk-Suffolk sub-region enabled constituencies that would be more similar to the existing West Suffolk and Bury St Edmunds constituencies, with only relatively minor changes required.
303. The North Suffolk constituency, which under the initial proposals would include a large number of rural wards from the West Suffolk, Mid Suffolk, and East Suffolk local authorities, elicited a small number of representations, with the majority being in opposition, claiming the constituency would be too vast, with poor internal transport links and no sizeable town to act as a focal point. In a number of counter proposals, the initially proposed North Suffolk constituency was replaced by the Waveney Valley constituency.
304. We received relatively few representations on our initially proposed Suffolk Coastal constituency. While it did receive some support from respondents, some considered the constituency did not best reflect community ties. Respondents stated that the Kelsale & Yoxford ward shared community ties with Saxmundham and other wards in the Suffolk Coastal constituency. Conversely, it was stated that Wickham Market shared community ties with Framlingham. We also received a number of counter proposals which proposed a more radical reconfiguration, with the Suffolk Coastal constituency being split into two, and the town of Felixstowe forming a constituency with eastern Ipswich, which it was argued would be more compact than our proposed narrow Suffolk Coastal constituency.
305. Our initially proposed Ipswich North and Stowmarket constituency received some support, although the majority of respondents were in opposition to the proposals. The support drew attention to the connections between the two towns, with the A14 road providing a strong transport link, while those in opposition stated that Stowmarket has more links to the town of Bury St Edmunds, and has little connection to the town of Kesgrave, on the far side of Ipswich. Furthermore, representations said that the communities of Wickham Market and Framlingham have strong ties, and should be retained within the same constituency, which were separated under our initial proposals.
306. The Ipswich constituency was wholly unchanged from the existing constituency in the initial proposals. We received few representations commenting on this proposed constituency, while most were supportive, some respondents suggested that Ipswich be divided between two constituencies.
307. The constituencies of South Suffolk – which was initially proposed to be unchanged other than to realign it with updated local government ward boundaries – and Lowestoft – the only changes to which in the initial proposals would be to transfer out the Bungay & Wainford ward and change name from the existing Waveney – were both largely uncontentious.

## Revised proposals

308. Our Assistant Commissioners noted the strong opposition to the proposed cross-county boundary constituency of Haverhill and Halstead and the well-supported counter proposals for an alternative sub-region. They decided to see the River Waveney area for themselves during a site visit, and observed that the physical geography and socio-economic characteristics on both sides of the river seemed to be similar, and noted the evidence that community ties spanned the river. They did not consider that the river and county boundary between Norfolk and Suffolk would therefore be an impediment to a successful constituency here. They therefore concluded that a cross-county boundary constituency be recommended to us here, and that it be called Waveney Valley.
309. After considering carefully all the different counter proposals that utilised a Suffolk-Norfolk sub-region, the Assistant Commissioners endorsed one that minimised change and disruption across the sub-region. It maintained the town of Stowmarket in the same constituency as Bury St Edmunds; allowed for the towns of Wickham Market and Framlingham to remain in a constituency together; proposed a Central Suffolk and North Ipswich constituency that would be more closely aligned to the existing constituency; allowed the ward of Kelsale & Yoxford to remain in the Suffolk Coastal constituency, linking it to the town of Saxmundham; and kept the Risby ward in a West Suffolk constituency. The Assistant Commissioners were not persuaded that a Newmarket and Thetford constituency would be a more suitable place for the cross-county boundary constituency, as they considered it would cause more disruption to existing constituencies across both Norfolk and Suffolk and would go directly against local sentiment.
310. We agreed with the assessment and recommendations of our Assistant Commissioners and therefore, in adopting the new sub-region, revised our initial proposals to adopt a cross-county boundary constituency of Waveney Valley.
311. For the same reasons, we accepted the recommendations of our Assistant Commissioners to revise our proposals to include a West Suffolk constituency that would be changed only to remove the Bardwell, Barningham, Stanton, and Ixworth wards, as well as small changes to realign it with updated local government ward boundaries, and a constituency that kept Stowmarket and Bury St Edmunds in the same constituency. They were persuaded that this approach would not only minimise disruption to the existing constituencies, but also reflect the views expressed in representations stating that the two towns have much in common. We agreed with the Assistant Commissioners and revised our proposals for Bury St Edmunds and West Suffolk constituencies.
312. In revising our proposals for a Bury St Edmunds constituency that would include the town of Stowmarket, our initially proposed Ipswich North and Stowmarket constituency would need to be significantly reconfigured in consequence. Our Assistant Commissioners considered the representations that called for Wickham Market to be included in a Central Suffolk and North Ipswich constituency, and the Kelsale & Yoxford ward to be included in Suffolk Coastal, were sufficiently persuasive, and recommended we adopt these changes as our revised proposals for these constituencies. We agreed with their recommendation; the Central Suffolk and North Ipswich constituency in our revised proposals would include all of the wards from the existing Central Suffolk and North Ipswich constituency, except for six wards in the north that would be included in the proposed Waveney Valley constituency.

313. We were not persuaded to alter our initial proposals by the representations that called for the Suffolk Coastal constituency to be split into two, with the town of Felixstowe forming a constituency with eastern Ipswich. The Ipswich constituency was wholly unchanged in our initial proposals and we considered there were insufficient grounds to alter it, as this would represent an unnecessary departure from the existing arrangement, and would likely have negative implications across the county. We therefore proposed no revisions to the proposed Ipswich constituency.
314. Our proposals for the South Suffolk and Lowestoft constituencies were both largely uncontentious. Our Assistant Commissioners recommended no changes to either constituency as initially proposed, and we agreed with them.

### **Consultation on the revised proposals**

315. As mentioned previously in the section on Norfolk, we received more than 80 representations about the Waveney Valley constituency. Although there was some support, the majority, by far, were in opposition. Most of these were very similar, claiming that the constituency is geographically too large, with too many local authorities involved, and that there is no link between the various areas.
316. Very few representations were received to our revised proposals for the Bury St Edmunds and West Suffolk constituencies, with most comments received being linked to the revised Waveney Valley constituency and, consequently, most were in opposition. One representation requested that Bury St Edmunds should be named Bury St Edmunds and Stowmarket.
317. Very few representations were received with respect to the following proposed constituencies, with very low levels of objection and no new evidence or argument identified: Ipswich; Central Suffolk and North Ipswich; Lowestoft; Suffolk Coastal; and South Suffolk. The representations relating to Central Suffolk and North Ipswich were almost exclusively positive.

### **Final recommendations**

318. The cross-county boundary proposed constituency of Waveney Valley is a consequence of the changes made to the sub-regions, which have been well supported, and the arguments for which convinced both the Assistant Commissioners and us as the best solution for the region as a whole. As noted above, we have seen no alternative that would enable a better pattern of constituencies across the region as a whole when measured against the statutory factors, with both our own initial proposals and other alternatives we have seen causing more disruption to existing constituencies and appearing to break local ties in multiple areas.
319. While we have considered new alternatives and evidence put forward against our revised proposals, we have also noted that, in general, our revised proposals across Suffolk generated little opposition, other than in relation to the proposed cross-county boundary constituency of Waveney Valley itself. While there has been conflicting evidence of the strength of community ties within this proposed constituency, we do not believe it is possible to create a better pattern of constituencies across the area as a whole and therefore propose to maintain our revised proposals. Although we have considered the request that the constituency be renamed Eye and Diss, we believe the Waveney Valley name is more reflective of the largely rural nature of the constituency, and has commanded greater support in consultation responses. However,



we recommend that the Bury St Edmunds constituency includes a reference to the town of Stowmarket in its name as both towns are located at opposite ends of the constituency.

320. Our final recommendations for Suffolk are therefore for constituencies of: Bury St Edmunds and Stowmarket; Central Suffolk and North Ipswich; Ipswich; Lowestoft; South Suffolk; Suffolk Coastal; Waveney Valley; and West Suffolk. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## Essex

### Initial proposals

321. There are currently 18 constituencies in Essex, ten of which have electorates that are within the permitted electorate range, three falling below and five above. In our initial proposals, none of the existing Essex constituencies were wholly unchanged, although two were changed only to realign with new local government ward boundaries. There was only minimal change to the majority of the existing constituencies. The most substantial change was to the existing Braintree constituency, as a result of the cross-county boundary constituency with Suffolk, which we called Haverhill and Halstead.
322. The only change to the existing Clacton constituency was to realign it with new local government ward boundaries. The neighbouring Harwich and North Essex constituency was also affected by these ward boundary changes, and in our proposals we made further changes to the west of the constituency. The Prettygate ward, in the existing Colchester constituency, was included in the Harwich and North Essex constituency, thereby bringing the Colchester constituency within the permitted electorate range without any further changes required, other than the realignment with new local government ward boundaries to the south and west of the constituency. In noting a general lack of direct road access over the River Colne between the Mersea & Pyefleet ward and the rest of the Harwich and North Essex constituency, we proposed this ward be included instead in the Witham constituency. The only other changes to the existing Witham constituency were to realign the boundaries with the new local government ward boundaries and the transfer of the Braintree district ward of Hatfield Peverel & Terling to our proposed Braintree constituency.
323. The only change to the existing Chelmsford constituency in our initial proposals was to include the Galleywood ward in our proposed Maldon constituency, which in turn would transfer the Little Baddow, Danbury and Sandon ward to the proposed Braintree constituency.
324. The electorate of the existing Castle Point constituency is currently below the permitted electorate range, and therefore an additional ward needed to be included. The Thurrock unitary authority wards to the west either have electorates that are too large or have no direct road links. The inclusion of any of the wards from the Rochford district to the north would divide the town of Rayleigh, and the Lodge ward has no direct road access. We therefore proposed to include the Southend-on-Sea unitary authority ward of West Leigh, currently in the Southend West constituency, in the Castle Point constituency. While we acknowledged this would not be ideal, we considered that no alternatives would provide a superior solution for the area as a whole, when taking into account the statutory factors.

325. The Southend West constituency was itself also under the permitted electorate range, and further change was therefore required. We proposed to transfer the Eastwood Park and St. Laurence wards from the Southend West constituency to the Rochford and Southend East constituency, with the A127 road to the south of the two wards forming a large part of the boundary between the two constituencies. In return, the St. Luke's, Victoria, and Milton wards would move from Rochford and Southend East to Southend West. We considered an alternative that would have divided the West Leigh ward between constituencies and would have minimised changes to existing constituencies in this area. However, this would have meant that only two polling districts from the Southend-on-Sea unitary authority would be included in a constituency that would otherwise be wholly coterminous with the Borough of Castle Point. We also proposed that the Roche North & Rural ward be included in Rochford and Southend East from the Rayleigh and Wickford constituency. No other changes were proposed to the existing Rayleigh and Wickford constituency, such that it would bring together parts of the town of Rochford in a single constituency, which would otherwise have been divided between constituencies due to local government ward boundary changes.
326. To reduce the electorate of the existing Thurrock constituency we proposed the inclusion of the two wards of Tilbury St. Chads, and Tilbury Riverside and Thurrock Park, in the South Basildon and East Thurrock constituency, uniting the Tilbury Docks with the villages of West and East Tilbury. In order to bring the South Basildon and East Thurrock constituency within the permitted electorate range, the Vange ward was transferred to the Basildon and Billericay constituency, which was otherwise unchanged.
327. We proposed a Saffron Walden constituency to include, from the existing Brentwood and Ongar constituency, the two wards of Moreton and Fyfield, and High Ongar, Willingale and The Rodings. As we considered that this change made the existing constituency name of Brentwood and Ongar less appropriate, we proposed it simply be called Brentwood. The only change we proposed to the existing Epping Forest constituency was to transfer the Broadley Common, Epping Upland and Nazeing ward to the Harlow constituency: we considered this ward to have links with the wards of Roydon and Lower Nazeing (currently within the Harlow constituency). This inclusion brought the electorate of the Harlow constituency within the permitted range without dividing the town of Waltham Abbey, or having knock-on effects on the proposed Saffron Walden constituency. No further changes were proposed to the existing Harlow constituency, other than minor realignments with new local government ward boundaries.
328. The electorate of the existing Saffron Walden constituency was significantly above the permitted range. As mentioned above, we proposed that two wards be transferred from the Brentwood constituency to the Saffron Walden constituency, enabling the four City of Chelmsford wards of Writtle, Chelmsford Rural West, Broomfield and The Walthams, and Boreham and The Leighs, to be transferred from the Saffron Walden constituency to the Braintree constituency. Ten wards from the existing Braintree constituency, including the town of Halstead, were included in the cross-county boundary Haverhill and Halstead constituency between Essex and Suffolk. Additionally, the Hatfield Peverel & Terling ward was included in our proposed Braintree constituency, with further changes to realign constituency boundaries with new local government ward boundaries. While the change to the existing Braintree constituency was significant, we considered it avoided a 'domino effect' of changes to a series of constituencies that would otherwise be caused by the

cross-county boundary constituency. Furthermore, the town of Braintree would remain united within a single constituency.

### **Consultation on the initial proposals**

329. As mentioned previously in this report, a large number of representations and counter proposals supported Essex being treated on its own as a sub-region, with particular opposition to the proposed Haverhill and Halstead constituency that crossed the boundary between Essex and Suffolk.
330. Our initially proposed constituencies of Colchester, Harwich and North Essex, and Witham generated over 1,000 representations, making it one of the areas in the country as a whole with the most representations received. In the initial proposals we had proposed that the Lexden & Braiswick ward, part of which is included in the existing Harwich and North Essex constituency, be wholly included in Harwich and North Essex, along with the Prettygate ward, due to the latter's links to the Lexden & Braiswick ward. The majority of representations called for these two wards to be included in the Colchester constituency, as it was considered that both wards are physically very close to the centre of Colchester, have little to no connection to the coastal town of Harwich (which is on the far side of Colchester), and included numerous important transport and community links, such as a key arterial route into Colchester and numerous schools.
331. Over 150 representations were also received regarding the ward of Mersea & Pyefleet being included in the proposed Witham constituency, rather than being retained in the Harwich and North Essex constituency. Many representations said the ward's primary links were to Colchester, but if it could not be included in that constituency, it was more suited to being included in a coastal constituency like Harwich and North Essex, rather than being included in a more inland rural constituency such as Witham. Poor transport links and community ties between the town of Witham and Mersea Island were also raised.
332. We received a number of counter proposals relating to the Colchester area, among which were: requests that the Prettygate ward be retained in the Colchester constituency (with Highwoods ward instead being included in the Harwich and North Essex constituency). Another counter proposal included the Stanway ward in Colchester, and transferred the St. Anne's & St. John's ward to Harwich and North Essex. A different counter proposal proposed instead the transfer of the Stanway ward to Harwich and North Essex, thereby bringing three wards containing areas of urban Colchester (Stanway, Prettygate, and Lexden & Braiswick) together in the Harwich and North Essex constituency. A more radical counter proposal created two Colchester constituencies, with the northern constituency including the town of Harwich, and the southern constituency including the Mersea & Pyefleet ward. While there was some support for this proposal, there was also opposition to this approach, with claims that the last time urban Colchester was split into two, the arrangement was disruptive, confusing and unpopular, and that a single, compact and wholly urban Colchester constituency, as is currently the case, should be retained with minimal change.
333. Our proposed Clacton constituency was wholly uncontroversial. However, counter proposals that proposed a sub-regional change often necessitated a small change to the proposed Clacton constituency. This would transfer the two wards of The Bentleys & Frating, and The Oakleys & Wix from the existing and initially proposed Harwich and North Essex constituency to the Clacton constituency.

334. The proposed constituencies of Castle Point, Southend West, and Rochford and Southend East generated over 700 representations, most of them in opposition. The proposed transfer of the West Leigh ward from the Southend West constituency to Castle Point was by far the most significant issue in the representations received, with the opposition being almost unanimous. Numerous reasons were provided as to why West Leigh should remain in a Southend constituency, including that West Leigh is intrinsically linked to both Leigh and the rest of Southend; it has little to no connection to much of the Castle Point constituency; and is separated from Castle Point by a natural geographical barrier of the Salvation Army fields to the west. One counter proposal transferred the Lodge ward from the Rayleigh and Wickford constituency to the Castle Point constituency, thereby avoiding splitting the town of Leigh. Another proposed splitting the Pitsea South East ward of Basildon Council, to include the DO polling district (covering the villages of Bowers Gifford and North Benfleet) in the Castle Point constituency, and this alternative approach was well supported.
335. There was opposition to the proposed transfer of Eastwood Park and St. Laurence wards to the Rochford and Southend East constituency, as it was said this would break ties of these wards with the town of Leigh. There were also a number of representations that argued that the city centre wards – generally considered to be Victoria, Milton and Kursaal – should be kept together in one constituency, ideally the more urban Southend West, with the wards of Eastwood Park and St. Laurence remaining, as initially proposed, in Rochford and Southend East. Other counter proposals each outlined slight variations from the initial proposals for the Southend West, and Rochford and Southend East constituencies, while still including the West Leigh ward in the Castle Point constituency. Additionally, some counter proposals said that the only change to the existing Southend West constituency should be for it to take the St. Luke's ward from the Rochford and Southend East constituency, while others called for Milton ward to transfer instead.
336. Few representations or counter proposals were received regarding the proposed South Basildon and East Thurrock constituency, other than the proposal to split the ward of Pitsea South East mentioned previously, and a further proposal to make a minor adjustment in the south-west of the ward near Thurrock. It was counter proposed that the two wards of Tilbury St. Chads, and Tilbury Riverside and Thurrock Park be retained in the Thurrock constituency, as in the existing arrangement, with the Chadwell St. Mary ward instead included in the South Basildon and East Thurrock constituency. The rationale behind these proposals was that the town of Tilbury and the Tilbury Docks are closely linked to the town of Grays in the Thurrock constituency, with which they share transport links and community ties.
337. The Braintree constituency was significantly reconfigured in our initial proposals and a large number of representations were received in opposition to this. Most of these stated that the proposed Braintree constituency was very different to the existing constituency, with a peculiar shape, and few links to the Chelmsford local authority wards that would be included (namely: Writtle; Chelmsford Rural West; Broomfield and The Walthams; and Boreham and The Leighs). We received a counter proposal, for a constituency comprising the towns of Braintree, Witham and Halstead, and a Mid-Essex Rural constituency that would stretch from areas west of Chelmsford, to Mersea Island south of Colchester. Counter proposals that called for Essex to be considered as a sub-region in its own right generally proposed a Braintree constituency that would be either unchanged from the existing constituency (apart from to realign to new local government ward boundaries), or have minor changes, with The Colnes ward being included in the Witham

constituency and The Sampfords, and Felsted & Stebbing wards being included from the Saffron Walden constituency.

338. We received a number of representations regarding the significant change proposed for Saffron Walden constituency, mostly during the second consultation, and these were almost exclusively in opposition to the proposal. Counter proposals retained the four Chelmsford wards of Writtle, Chelmsford Rural West, Broomfield and The Walthams, and Boreham and The Leighs in the Saffron Walden constituency, but required the Uttlesford local authority to be divided between three constituencies (rather than one as in the existing pattern): The Sampfords, and Felsted & Stebbing wards would be included in an alternatively configured Braintree constituency; and the Hatfield Heath, and Broad Oak & the Hallingburys wards would be transferred to the Harlow constituency from the existing Saffron Walden constituency, with Harlow including wards from three different local authorities. The Broadley Common, Epping Upland and Nazeing ward was proposed to be retained in the Epping Forest constituency, which would then be wholly unchanged from the existing arrangement.
339. The representations received regarding the proposed Brentwood constituency were mostly in opposition, but relatively few in number. Counter proposals that called for Essex to be a sub-region on its own proposed that the Maldon constituency retain the ward of Little Baddow, Danbury and Sandon, and a number of representations included all of the wards from the Maldon local authority in a single constituency, as well as a number of wards from the Colchester local authority.
340. We received around 40 representations regarding the proposed Chelmsford constituency, split roughly equally between those supporting and opposing the initial proposals. Those supporting said that the Galleywood ward is the most appropriate ward to be included in the Maldon constituency, while opposing representations said that it should be retained by dividing the town of Chelmsford into two constituencies. Other representations said that the Goat Hall ward should no longer be included in the Chelmsford constituency
341. The inclusion of the Vange ward from South Basildon and East Thurrock was the only change to the existing Basildon and Billericay constituency and was largely uncontroversial
342. There was little opposition to the inclusion of the whole of the Roche North & Rural ward in the proposed Rochford and Southend East constituency, and there were very few responses in relation to the proposed Rayleigh and Wickford constituency (essentially unchanged other than this ward transfer).

### **Revised proposals**

343. Our Assistant Commissioners considered that the counter proposals and representations calling for Essex to be treated as a separate sub-region in its own right, and the views contained within them, were sufficiently compelling, and they recommended to us that Essex be treated as a sub-region on its own, rather than be paired with Suffolk, as in the initial proposals. They considered that there were numerous reasons for accepting this sub-regional change, with benefits across much of Essex, Suffolk and Norfolk. As previously outlined, we agreed with this recommendation and proposed Essex form its own sub-region as part of our revised proposals.

344. With Essex treated as a stand-alone sub-region, it is not possible for the Colchester, Harwich and North Essex, and Witham constituencies to remain the same as in the initial proposals, as the electorate of the rest of the county would be too high to create a coherent scheme. In view of the conflicting evidence with regard to which wards should be included, or otherwise, in the Colchester constituency, our Assistant Commissioners decided to visit the area and to observe for themselves the links between the different wards and the city centre.
345. Our Assistant Commissioners noted that the River Colne divides the Mersea & Pyefleet ward from the Tendring local authority wards that comprise the rest of the Harwich and North Essex constituency, with no bridge crossing until much further north near Colchester, outside of the ward. However, the Mersea & Pyefleet ward is currently included in the existing Harwich and North Essex constituency, whereas Stanway is currently in the Witham constituency. Furthermore, representations were clear that the Mersea & Pyefleet ward has poor links west towards the town of Witham, with the ward instead sharing a coastal and maritime character with a number of communities in the Harwich and North Essex constituency. They also noted that the River Colne has historically been a navigable river that linked the City of Colchester and its hinterland with the port of Brightlingsea. As such, they considered that the most suitable way to create a coherent pattern of constituencies across Essex would be for the Stanway ward to be included in the Witham constituency, and for the Mersea & Pyefleet ward to be included in the Harwich and North Essex constituency. They considered that this would most closely fulfil the statutory requirements of maintaining existing constituencies and local ties, despite the geographical considerations in the area.
346. Regarding the issue of the Lexden & Braiswick, and Prettygate wards, our Assistant Commissioners noted during their visit that these two areas appeared to be an integral part of Colchester, with strong transport links, close geographical proximity, historical links and community ties regarding schools and other establishments. They also considered, however, that the Lexden & Braiswick ward as a whole is geographically large, with a significant rural element, and the latter part could justifiably not be included in an urban Colchester constituency. They accordingly recommended that our initial proposals should be revised, and that this ward be split, with the three mostly urban polling districts (Colchester AQ, AS, and AT), which are divided from the rest of the ward by the A12 road and the railway line, being included in the proposed Colchester constituency, and the three rural polling districts (Colchester EJ, ET, and EU) remaining in the Harwich and North Essex constituency. This would also allow the existing constituency boundary in this area to be retained.
347. Our Assistant Commissioners also recommended that the entirety of the Prettygate ward be included with Colchester, as it is in the existing arrangement. However, to accommodate the whole of the Prettygate ward and part of the Lexden & Braiswick ward in the Colchester constituency, it was necessary for another ward that was initially proposed to be included in the Colchester constituency to instead be transferred to the Harwich and North Essex constituency, in order to bring both constituencies within the permitted electorate range.
348. This issue was carefully considered by the Assistant Commissioners in their recommendations to us, and it was clear to us that none of the options is without negative consequences. We considered that the counter proposal to divide the City of Colchester, including the separation of the closely-linked areas of Lexden and Prettygate, required an unnecessarily large departure from the existing constituency boundaries. We also considered that the counter proposals

that included the Prettygate, and Lexden & Braiswick wards in the Harwich and North Essex constituency were undesirable due to their close links to Colchester.

349. Based on the recommendations of our Assistant Commissioners, we proposed the transfer of the ward of Old Heath & The Hythe to the Harwich and North Essex constituency. We noted that a significant portion of this ward, including all of the village of Rowhedge, is already included in the existing Harwich and North Essex constituency. Also, as the Mersea & Pyefleet ward was now proposed to remain in the Harwich and North Essex constituency, including the Old Heath & The Hythe ward would provide a stronger link between Mersea & Pyefleet and the rest of the constituency, as it contains Fingringhoe Road (which becomes Old Heath Road) and the Colne Causeway bridge – the first bridge crossing the River Colne when driving from Mersea to Harwich. Furthermore, the town of Wivenhoe has links to the village of Rowhedge via the foot ferry. We acknowledge that a significant portion of the Old Heath & The Hythe ward is in the existing Colchester constituency and has close community ties to the city. However, this is true of any of the other options, such as the Greenstead, St. Anne's & St. John's, Highwoods, and Mile End wards, which our Assistant Commissioners also visited; Old Heath & The Hythe is the only ward out of these options that has a significant portion already included in the existing Harwich and North Essex constituency.
350. Our initially proposed Clacton constituency was wholly uncontentious. With the change to a stand-alone Essex sub-region, however, the transfer of two wards to Clacton from the Harwich and North Essex constituency mentioned above became necessary. While this is further from the existing constituency than the initial proposals, and stretches the constituency further north, taking in parts of the A120 road, our Assistant Commissioners considered that the significant, wider benefits of the sub-regional change in other areas far outweighed the disadvantages of these changes to the Clacton constituency, and therefore recommended this relatively small change to the constituency. We agreed and revised the initial proposals for the Clacton constituency.
351. One counter proposal transferred the Lodge ward from the Rayleigh and Wickford constituency to the Castle Point constituency. While this avoided splitting the town of Leigh, and gave more flexibility within the two Southend constituencies, it would divide the town of Rayleigh, and the ward has little to no direct transport links to the Castle Point constituency. We were therefore not persuaded to adopt this approach.
352. Our Assistant Commissioners visited the Southend and Castle Point areas. They considered that West Leigh was an integral part of Leigh-on-Sea and noted the considerable expanse of marshland and creeks that separates much of the ward from the Castle Point constituency. They also visited the Pitsea South East ward, and noted that, while the A130 road lies between the communities of Bowers Gifford and North Benfleet in the ward, and the Castle Point areas to the east, the connecting A13 provides a direct transport link between the two, via the Sadlers Farm roundabout. They also noted a clear physical separation of open land between Bowers Gifford and North Benfleet and the towns of Pitsea and Basildon, and that a split ward here would bring North Benfleet and South Benfleet into a constituency together. To no longer include the West Leigh ward in the Castle Point constituency would also have the benefit of allowing more flexibility within the two Southend constituencies.

353. We considered all of the evidence and agreed with the recommendations of our Assistant Commissioners. We believed that dividing the Pitsea South East ward in this instance was the right option, in order to increase the electorate of the Castle Point constituency to within the permitted range while also formulating a pattern of constituencies in the wider surrounding area that overall better reflects the statutory factors. The initial proposals were strongly opposed by local residents, who demonstrated how they would break local ties; and the Lodge ward alternative was supported by only a few respondents, has very weak transport connections, and would significantly disrupt local ties in Rayleigh. We consequently considered the main alternatives put forward to be more disadvantageous.
354. The Assistant Commissioners considered that the option for the Southend West, and Rochford and Southend East constituencies that took most account of the statutory factors would be to adopt the approach that kept the city centre wards together, but in the more urban Southend West constituency. They therefore recommended a constituency comprising the whole of the existing Southend West constituency except the wards of Eastwood Park and St. Laurence (which would transfer to the Rochford and Southend East constituency as in the initial proposals), with the additional inclusion of the three wards of Milton, Victoria and Kursaal. While we acknowledged it is possible to minimise change further, the Assistant Commissioners considered this was not preferable, given the less optimal shape and accessibility of the constituencies that would result, and the strong ties of the city centre wards to each other and to the west that would be broken. In respect of the inclusion of Eastwood Park and St. Laurence in the Rochford and Southend East constituency, they noted evidence that these wards contained the residential parts of Southend-on-Sea closest to the airport, and arguments that there would therefore be value having both the airport, and those most likely to be impacted by it, represented by the same MP. While noting representations that stated these two areas have connections to Leigh, the Assistant Commissioners during their site visit to the area also felt that the A127 road does form a clear and readily identifiable boundary, and that the benefits gained overall from the distribution of wards they had recommended across the rest of the area outweighed the disadvantages.
355. Finally, in this area, the Assistant Commissioners recommended that this more compact western Southend constituency be renamed Southend Central and Leigh, as they considered that this better reflected both the inclusion of the city centre wards and the distinct and strong community identity of Leigh in the west of the city. We agreed with their conclusions and proposed that the constituency be renamed.
356. Few representations or counter proposals were received regarding the proposed South Basildon and East Thurrock constituency. Our Assistant Commissioners were persuaded by the arguments to retain the two wards of Tilbury St. Chads, and Tilbury Riverside and Thurrock Park in the Thurrock constituency, with the Chadwell St. Mary ward instead included in the South Basildon and East Thurrock constituency.
357. Counter proposals that called for Essex to be considered as a sub-region in its own right generally proposed a Braintree constituency that would either be unchanged from the existing constituency (apart from to realign to new local government ward boundaries), or have minor changes, with The Colnes ward being transferred to the Witham constituency and The Sampfords, and Felsted & Stebbing wards being taken from the Saffron Walden constituency. Our Assistant Commissioners acknowledged that there were merits in the Braintree constituency being unchanged other than to realign to new local government ward boundaries. However, they considered that the changes



put forward by counter proposals were preferable, as it would allow for a pattern of constituencies across the rest of Essex that more closely reflect the statutory factors, while still allowing the existing Braintree constituency to be mostly retained.

358. Overall, despite some disadvantages, such as the Uttlesford local authority being divided between three constituencies, our Assistant Commissioners accepted the counter proposals that retained the four Chelmsford wards of Writtle, Chelmsford Rural West, Broomfield and The Walthams, and Boreham and The Leighs in the Saffron Walden constituency: The Sampfords, and Felsted & Stebbing wards would be included in an alternatively configured Braintree constituency; and the Hatfield Heath, and Broad Oak & the Hallingburys wards would be transferred to the Harlow constituency from the existing Saffron Walden constituency, with Harlow including wards from three different local authorities. The Broadley Common, Epping Upland and Nazeing ward would be retained in the Epping Forest constituency, which would then be wholly unchanged from the existing arrangement. We agreed with the recommendations of our Assistant Commissioners and accordingly altered our initial proposals for these constituencies.
359. Our Assistant Commissioners noted the representations that opposed the changes to the Saffron Walden constituency. Reconfiguring the sub-regions meant that the Saffron Walden constituency no longer needed to include the two wards of Moreton and Fyfield, and High Ongar, Willingale and The Rodings, which could be retained in a Brentwood and Ongar constituency, as numerous counter proposals put forward. We accepted this revision, as it allowed for the Brentwood and Ongar constituency to be unchanged except to realign to new local government ward boundaries. As a consequence, we were able to retain the existing name of Brentwood and Ongar in our revised proposals.
360. Counter proposals called for the Maldon constituency to retain the ward of Little Baddow, Danbury and Sandon, which would minimise disruption from the existing constituency, as every ward in the existing constituency would be retained and there would be the single addition of the Galleywood ward. The Assistant Commissioners found this sufficiently persuasive, and we subsequently adopted the change in our revised proposals.
361. With regard to the representations received about the proposed Chelmsford constituency, we noted that they were split roughly equally between those supporting and opposing the initial proposals. However, our Assistant Commissioners did not consider any change to the initially proposed constituency was necessary. We agreed, and did not revise our proposals for this constituency.
362. The inclusion of the Vange ward from South Basildon and East Thurrock was the only change to the existing Basildon and Billericay constituency and was largely uncontentious. We agreed with the recommendations of our Assistant Commissioners to make no revisions to our initial proposals here.

### **Consultation on the revised proposals**

363. Approximately 700 representations on our revised proposals were received with regard to the Colchester, Harwich and North Essex, and Witham constituencies. Most were in opposition, but around 200 were in support.
364. Those in support argued that Prettygate and Lexden were now correctly included in Colchester, and that, if one ward needed to be excluded from Colchester, Old Heath & The Hythe was

the least worst option. Those representations supporting the revised proposals also said that the following estuary communities were now kept together in a single constituency: Hythe; Rowhedge; Alresford; Wivenhoe; Brightlingsea; and Mersea. Those in opposition argued that the Old Heath & The Hythe ward is an important historical area, with the old port, and Hythe station, and many links to Colchester, including simple proximity. Two petitions were received, both opposing the inclusion of the Old Heath & The Hythe ward in Harwich and North Essex.

365. One counter proposal included the Mile End ward (from Colchester) and the Stanway ward (from Witham) in Harwich and North Essex; the Old Heath & The Hythe ward was returned to Colchester; and the Mersea & Pyefleet ward was included in Witham (as in the initial proposals). Another counter proposal included the St. Anne's & St. John's, and Greenstead wards in Harwich and North Essex, the Stanway ward in Colchester, and the Mersea & Pyefleet ward in Witham. Many other counter proposals were received, among them those which instead excluded the Greenstead ward from Colchester. There were further counter proposals that included the Stanway and Greenstead wards in Harwich and North Essex, and the Mersea & Pyefleet ward in Witham; those which proposed a different split of Colchester; those which proposed a Colchester that is similar to the initial proposals; and those which involve further ward splits.
366. Few representations were received regarding the Harwich and North Essex, and Witham constituencies, other than regarding their relation to Colchester or to Clacton (in the case of Harwich and North Essex, discussed below). Some suggested that Harwich and North Essex should simply be named North East Essex, and that Witham be renamed Witham and West Colchester.
367. Around 90 representations were received regarding the revised Clacton constituency, almost all opposing the transfer in of the two wards of The Bentleys & Frating, and The Oakleys & Wix from the Harwich and North Essex constituency. The main thrust of this opposition was that residents here consider themselves as residing in inland wards, with links to other rural communities, and the wards would not be a suitable inclusion in a coastal constituency. One representation suggested that The Oakleys & Wix ward be split between constituencies.
368. Very few representations were received with regard to the Thurrock, South Basildon and East Thurrock, and Basildon and Billericay constituencies, although there was a request that South Basildon and East Thurrock be renamed Stanford and Pitsea.
369. We also received very few representations about the revised Braintree constituency, with no stand-out themes, although one counter proposal argued for a change to Braintree and Saffron Walden. There were relatively few representations about the revised Saffron Walden constituency itself, although most were in opposition. Some of these proposed that the name be changed to North West Essex to better reflect the totality of the constituency, much of which is not near Saffron Walden. We received two counter proposals, one calling for a small change, the other arguing that Felsted & Stebbing, and The Sampfords should remain within Saffron Walden, and Boreham and The Leighs should be moved to the Witham constituency (thereby creating an orphan ward).
370. We received very few representations about the Brentwood and Ongar constituency, although one representation requested that The Rodings be kept together in the same constituency. We received around 15 representations about the Rayleigh and Wickford constituency, mostly in opposition, but no significant new evidence was raised.

371. We received significantly more representations – mostly in opposition – concerning the Chelmsford and Maldon constituencies. Many of these either mentioned both constituencies, or were submitted in connection with comments concerning other constituencies. However, these included no significant new evidence in relation to these constituencies. Some counter proposals called for the Maldon constituency to be renamed Maldon and South Chelmsford.
372. We received very few representations about the Epping Forest constituency, and only a slightly higher number regarding Harlow. Although most were in opposition, there was also support. We received fewer than ten representations with regard to the Castle Point constituency: while there was some opposition, there was also praise for the split of the Pitsea South East ward, in view of the ward’s separation from Basildon.
373. We received around 400 further representations concerning the Southend constituencies, with a slight numerical majority opposed to our revised proposals. Those in support agreed that the A127 is a definitive boundary between the proposed Southend Central and Leigh, and Rochford and Southend East constituencies, considered the shapes to be logical, and supported keeping the three city centre wards together in a predominantly urban constituency. Almost all those in opposition argued that including the St. Luke’s ward in Southend West, with no other changes, is the best solution on the basis of the minimal change involved. Those in opposition also suggest that the Eastwood Park and St. Laurence wards have strong links to Leigh. Others stated that, of the three wards it was proposed be moved from Southend East to Southend Central and Leigh, two are either wholly or largely east of The Pier and Victoria Avenue, which they contend are the natural borders between East and West Southend.
374. We received over 60 representations specifically about the Rochford and Southend East constituency, largely in support. Those in support argued that the revised proposals are a better reflection of their area, in that the mostly rural constituency contains more rural elements. However, some representations highlighted the difference between the Kursaal ward and Leigh, asserting they should not be included together in the same constituency. We received some proposals for alternate names, including Southend East and Rochford, or Southend Outer and the Roche.

### **Final recommendations**

375. In view of the continued significant opposition to our proposals in the Colchester and Southend constituencies, we undertook a further site visit to the areas.
376. We considered that the A127 did provide an identifiable boundary between the Eastwood Park ward – in particular – and the St. Laurence ward with the rest of Southend. We noted that there are minimal crossings southwards and, on entry into the Eastwood Park ward, most of the roads appear to run northwards or east-west, and not south to Southend. Also, on the south side of the A127 there was considerable residential development, whereas on the north side of the road, at least closest to the road, the land use was mainly industrial. The A127 continues as a boundary between the St. Laurence ward and the rest of Southend. The proximity of Southend Airport to the A127 was observed (the airport runway actually crosses the boundary between the Roche South ward in Rochford and the St. Laurence ward), and the A127 continues to mark the boundary between St. Laurence and the Prittlewell ward to its south. However, despite our observations, we were mindful that the residents of both wards have stated strongly and clearly

in the representations that they consider themselves to be part of Southend and that there are particularly strong links with the town of Leigh-on-Sea.

377. The south-east of the St. Laurence ward was observed to have links with the rest of Southend via the Prittlewell ward. We observed that the St. Luke's ward was well linked to the Victoria and Kursaal wards, although we also considered it to have strong links to the St. Laurence ward via the A1159 Eastern Avenue, which is effectively the extension of the A127.
378. We also observed the links between the Milton, Victoria and Kursaal wards, which, it had been stated, formed the core of the city centre, and of their links both westwards and eastwards. It had been suggested by some respondents that within this area was the historic boundary between West and East Southend. From our observations, it seemed clear that the Milton ward is the core of Southend, containing the main shopping and retail centre. The Victoria ward to the north was very close to the centre, as was the Kursaal ward, despite being separated from Milton by the A1160 road. It was noted that the three main railway stations were located in each of these three wards: Southend Central in Milton, Southend Victoria in Victoria, and Southend East located just inside the Kursaal ward. The three wards also come together at the A1160 roundabout, just metres from the main shopping district, and the pleasure beach extends seamlessly from the Milton ward across to Kursaal. We considered that the argument that the three wards were, in effect, the city centre carried considerable strength, and acknowledged the sentiments that all three wards should be included in the same constituency.
379. In noting the opposition to our revised proposals we therefore reconsidered the alternatives. Although we considered that our revised proposals had merit, we accepted that the revised proposals transferred five wards between the two constituencies, whereas many of the representations suggested that we should adopt a minimal change option that would move just one ward between the constituencies, and still retain the three city centre wards in a single constituency. We concluded that the counter proposals that suggested minimal change did better reflect the statutory criteria and that we should alter our revised proposals and adopt the minimal change option. This would mean that the Eastwood Park and St. Laurence wards would remain in a western Southend constituency, with the St. Luke's ward (the only ward that would change constituency) also being included in the western constituency. The Milton, Victoria and Kursaal wards would remain in the eastern Southend constituency. However, we considered that the adoption of these proposals would necessitate changes to the constituency names. We recommend that the Southend Central and Leigh constituency (as in our revised proposals) be renamed Southend West and Leigh. In acknowledging that Southend-on-Sea had achieved city status during the course of this review, and that the city centre wards would be contained within one constituency, we recommend that the name of the Rochford and Southend East constituency be reversed, and that the constituency be renamed Southend East and Rochford.
380. Given the representations received in regards to our pattern of constituencies in the Colchester area we decided to conduct a site visit. We observed that the Stanway ward appeared largely rural in nature, except to the north in closer proximity to Colchester. The City of Colchester sign appears at the boundary between the Stanway and Prettygate wards. The links of the Prettygate and Lexden area of the Lexden & Braiswick ward were evident, as were their links with Colchester city centre. Both are older and similar in nature to the centre of Colchester, particularly Lexden, which appears to be more historical in nature.

381. Our observations of the Mile End ward confirmed its position as being part of the core of Colchester, containing the main railway station and hospital. The Highwoods ward in the north of the city contains much new housing development, including Colchester Business Park, and the links through this ward into the St. Anne's & St. John's ward appeared to be a seamless continuation of the built environment, although St. Anne's & St. John's is clearly more like 'old' Colchester.
382. Similarly seamless were the links between the St. Anne's & St. John's ward through the Greenstead ward. It was noted that to the east of the Avon Road, the built-up area of Colchester ended abruptly on the east with a substantial rural element and higher terrain in the adjacent Wivenhoe ward. It appeared clear that Greenstead (which included Hythe railway station) looked westwards to Colchester.
383. Our observations of the northern part of the Old Heath & The Hythe ward confirmed that it was very evident that this part of the ward, which is currently in the Colchester constituency, and which comprises Hythe and Old Heath, is indeed very much a part of Colchester. There is a mix of substantial new residential building – much of it high rise – and much older, more traditional neighbourhoods that appeared to bear a close resemblance to the rest of Colchester and the city centre: the area had a distinctly urban feel. South of this area there is some open countryside – where the existing constituency boundary was located – before the community of Rowhedge, which is currently in the existing Harwich and North Essex constituency. The southern part of the ward is therefore noticeably rural and shares many characteristics with the Mersea & Pyefleet ward to its south, which was also visited. Though our observations might support the case for a split of the ward, this is not feasible numerically: the electorate of the revised Colchester constituency is already 76,843, allowing for only around another 200 electors to be included, but there are almost 8,600 electors of the Old Heath & The Hythe ward (with most of these residing in the urban part that we would otherwise look to include in Colchester).
384. We fully acknowledge and understand the views of those who consider that the Old Heath & The Hythe ward is part of Colchester. However, the electorates in this area do not permit the inclusion of the Old Heath & The Hythe ward in the Colchester constituency without excluding another ward with at least as strong ties to the city. We also considered that the inclusion of the Old Heath & The Hythe ward in the Harwich and North Essex constituency provided for a crossing of the River Colne. We therefore propose no change to our revised proposals for the Colchester, Witham, and Harwich and North Essex constituencies.
385. With regard to the remaining constituencies in Essex, in light of the generally low level of response to our revised proposals, and mix of support and opposition among those, we do not propose further change to our revised proposals, apart from recommending that the Saffron Walden constituency should be renamed North West Essex, to better reflect the composition of the constituency
386. Our final recommendations for Essex are therefore for constituencies of: Basildon and Billericay; Braintree; Brentwood and Ongar; Castle Point; Chelmsford; Clacton; Colchester; Epping Forest; Harlow; Harwich and North Essex; Maldon; North West Essex; Rayleigh and Wickford; South Basildon and East Thurrock; Southend East and Rochford; Southend West and Leigh; Thurrock; and Witham. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

# London

387. London currently has 73 constituencies. Of these constituencies, 20 have electorates within the permitted range. The electorates of 20 constituencies were below the permitted range, while the electorates of 33 constituencies were above. Our proposals increase the number of constituencies in the region by two, to 75.
388. London comprises the 32 London boroughs and the City of London Corporation.<sup>2</sup>
389. We appointed two Assistant Commissioners for London – John Feavyour QPM and Parjinder Basra – to assist us with the analysis of the representations received during the first two consultation periods. This included chairing public hearings, which were held in the region in order to hear oral evidence directly from the public. The dates and locations of these hearings were:
- Westminster: 24–25 February 2022
  - Havering: 28 February–1 March 2022
  - Ealing: 3–4 March 2022
  - Merton: 7–8 March 2022
  - Bromley: 10–11 March 2022.

## Sub-division of the region

390. In formulating our initial proposals, we noted that the electorate of London of 5,550,454 results in it being mathematically entitled to 75.63 constituencies. The statutory formula for distribution of numbers of constituencies to different parts of the UK (and applied by us equally to the English regions) allocated 75, rather than 76, constituencies to London – an increase of two from the current number. We then considered how 75 constituencies could be split across the region, seeking to respect the geographic boundary of the River Thames between ‘North’ and ‘South’ London.
391. We noted that the four boroughs of Barking and Dagenham, Havering, Redbridge, and Waltham Forest have a total electorate of 662,740, resulting in a mathematical entitlement to 9.03 constituencies. We therefore decided to allocate nine constituencies to these four boroughs, the same as the existing allocation, and treat them together as the North East London sub-region.
392. The two boroughs of Newham and Tower Hamlets have a combined electorate of 368,155, resulting in a mathematical entitlement to 5.02 constituencies. We therefore proposed to treat these two boroughs together as a sub-region, with an allocation of five constituencies – an increase of one from the current number.
393. In formulating our initial proposals, we decided to treat the North Central and North West London areas together as a single sub-region, since our investigations showed that treating the North

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<sup>2</sup> In the remainder of this section, general references to ‘borough’ should be taken to include the Corporation, where the context permits, unless expressly stated otherwise.

Central area as a stand-alone region meant its constituencies would have to be very near the maximum permitted electorate, significantly narrowing the options for building constituencies without needing to split multiple wards. We therefore proposed a North Central and North West London sub-region comprising the boroughs of: Barnet; Brent; Camden; the City of London; Ealing; Enfield; Hackney; Hammersmith and Fulham; Haringey; Harrow; Hillingdon; Hounslow; Islington; Kensington and Chelsea; Richmond upon Thames (that part which lies on the north side of the River Thames); and Westminster. The total electorate of this sub-region, at 2,397,559, results in a mathematical entitlement to 32.66 constituencies. We allocated the sub-region 32 constituencies, rather than 33, considering that this larger area would be the optimal place to accommodate the difference between London's mathematical entitlement and allocation of constituencies, as mentioned above.

394. When exploring sub-region arrangements for South London, we noted that it would be possible to consider South Central and South West London separately. However, our investigations showed that it was difficult to create a practicable scheme of constituencies in a stand-alone South Central sub-region without needing to split multiple wards. We therefore decided to treat the South Central and South West areas together to form a single sub-region consisting of the boroughs of: Croydon; Kingston upon Thames; Lambeth; Lewisham; Merton; Richmond upon Thames (that part which lies on the south side of the River Thames); Southwark; Sutton; and Wandsworth. This sub-region has an electorate of 1,538,390, resulting in a mathematical entitlement to 20.95 constituencies. We therefore allocated 21 constituencies to this sub-region.
395. The three boroughs of Bexley, Bromley, and Greenwich have a combined electorate of 583,610 and a mathematical entitlement to 7.96 constituencies. We therefore proposed to treat these three boroughs together as the South East London sub-region, with an allocation of eight constituencies.
396. We noted that the existing Lewisham West and Penge constituency crossed between our proposed South Central and South West, and South East sub-regions. However, given that our proposed sub-regions were each entitled to an almost whole number of constituencies, we considered that adhering to these sub-regions would enable a better reflection of the statutory factors across the whole of South London than if we retained the existing Lewisham West and Penge constituency.
397. The principle of maintaining the River Thames as a geographical boundary between North London and South London was mostly supported during the consultation on the initial proposals. Our North East London sub-region and Newham and Tower Hamlets sub-region received almost unanimous support. We did receive objections to the split of sub-regions elsewhere, particularly regarding North Central and North West London, and South Central and South West London, with alternative arrangements suggested such as: separate North Central and North West sub-regions, using the A5 (Edgware Road) as a geographical dividing line. Some respondents proposed breaking down the North Central and North West area into three or even four smaller sub-regions. We also received proposals to create stand-alone South West and South Central sub-regions, respecting the borough boundary between Croydon and Merton; and various different groupings of boroughs in the South Central and South East areas
398. In formulating our revised proposals, we were persuaded by the evidence received to divide the North Central and North West sub-region into two smaller sub-regions respecting the A5 road

as a boundary. We considered that this approach would, on the whole, minimise change to the existing constituencies (particularly across North Central London), reduce the number of borough boundary crossings, and better reflect local ties in a number of areas. We were also persuaded by the evidence to treat South West and South Central London as separate sub-regions, considering that this approach allowed for improvements to the initial proposals in respect of the statutory factors. Mindful of some finely balanced arguments in the areas of South Central and South East London, we were ultimately not persuaded by the evidence to revise our initially proposed South East sub-region.

399. In response to our revised proposals, we did not receive any further evidence that would justify the use of alternative sub-regions to those we adopted in our revised proposals. Therefore, the sub-regions we propose as part of the final recommendations are:

- North East London (Barking and Dagenham; Havering; Redbridge; and Waltham Forest)
- Newham and Tower Hamlets
- North Central London (Barnet; Camden; Enfield; Hackney; Haringey; and Islington)
- North West London (Brent; the City of London; Ealing; Hammersmith and Fulham; Harrow; Hillingdon; Hounslow; Kensington and Chelsea; Richmond upon Thames (north); and Westminster)
- South West London (Kingston upon Thames; Merton; Richmond upon Thames (south); Sutton; and Wandsworth)
- South Central London (Croydon; Lambeth; Lewisham; and Southwark)
- South East London (Bexley; Bromley; and Greenwich).

## North East London

### Initial proposals

400. Of the nine existing constituencies in the North East London sub-region, four had electorates within the permitted electorate range: Dagenham and Rainham; Ilford North; Romford; and Walthamstow. The two constituencies of Chingford and Woodford Green, and Leyton and Wanstead, were beneath the permitted range, while the three constituencies of Barking, Hornchurch and Upminster, and Ilford South fell above the permitted range.
401. In our initial proposals for the Borough of Havering, we proposed bringing the existing Hornchurch and Upminster constituency within the permitted electorate range by transferring Emerson Park ward from the Hornchurch and Upminster constituency to the Romford constituency. To keep the Romford constituency within the permitted range without consequential further disruption to neighbouring constituencies, we proposed splitting Hylands ward between the Hornchurch and Upminster, and Romford constituencies.
402. In the boroughs of Barking and Dagenham, and Redbridge, we proposed transferring Valence ward from the Barking constituency to the Dagenham and Rainham constituency; Chadwell Heath ward from the Dagenham and Rainham constituency to the Ilford South constituency;



and Cranbrook and Valentines wards from the Ilford South constituency to the Ilford North constituency.

403. Our initial proposals for the Borough of Waltham Forest retained the existing Walthamstow constituency wholly unchanged. The existing Leyton and Wanstead constituency – which spans the boroughs of Waltham Forest and Redbridge – was adjusted to align with new local government ward boundaries in the Borough of Redbridge, and included the whole of South Woodford ward. The existing Chingford and Woodford Green constituency – also spanning the boroughs of Waltham Forest and Redbridge – was realigned with new local government ward boundaries, and additionally included the Borough of Redbridge ward of Bridge from the existing Ilford North constituency.

### **Consultation on the initial proposals**

404. In response to the consultation on our initial proposals, our rationale for splitting a ward in the Borough of Havering was broadly supported. However, we received strong opposition to our proposed transfer of Emerson Park ward from the Hornchurch and Upminster constituency to the Romford constituency, including almost 600 unique representations and two online petitions. Residents of Emerson Park argued that they consider themselves part of the Hornchurch community and look to Hornchurch, rather than Romford, for local amenities. Several respondents also contended that Emerson Park provides key geographical and road links between the northern and southern parts of the Hornchurch and Upminster constituency, therefore its removal would undermine the constituency's geographical cohesion.
405. Conversely, we also received notable support for our proposed transfer of Emerson Park ward, including over 150 representations and four petitions. Respondents argued that Emerson Park ward has strong community ties with its neighbouring Squirrel's Heath ward, part of the existing Romford constituency. In terms of geography, some argued that Emerson Park ward is separated from the rest of the Hornchurch and Upminster constituency by the geographic boundaries of the River Ingrebourne to the east and the railway line to the south, whereas there are no geographic dividers between Emerson Park and Squirrel's Heath.
406. We received a number of counter proposals and alternative suggestions for constituencies in the Borough of Havering. Some of these proposed transferring all or part of the Harold Hill area to the Romford constituency instead of Emerson Park. Others submitted that changes in the borough could be minimised by keeping Emerson Park ward in the Hornchurch and Upminster constituency, keeping Hylands ward wholly in the Romford constituency, and splitting Hacton ward between the Hornchurch and Upminster, and Dagenham and Rainham constituencies. Several representations advocated that we should consider Havering's new ward boundaries, for which the Order was made in September 2021. They argued that using the new boundaries would better reflect community ties, in particular uniting the Elm Park community, and would avoid splitting new wards, and the confusion that may entail in the future.
407. Our initially proposed Barking, and Dagenham and Rainham constituencies attracted very few representations. However, our proposed transfer of Chadwell Heath ward elicited a greater response, since our proposal would make Chadwell Heath an orphan ward from the Borough of Barking and Dagenham in the Ilford South constituency, which otherwise comprises Borough of Redbridge wards, and would break community ties, as a petition told us that the Chadwell Heath community crosses the A118 into the neighbouring Whalebone ward. A counter proposal

suggested moving Becontree ward into the Ilford South constituency instead, but this would also be an orphan ward, and divide the Becontree Estate. Our proposal did, however, receive a small amount of support, as the edge of the boroughs between the Chadwell and Chadwell Heath wards is not considered a boundary by some.

408. The inclusion of the Borough of Redbridge wards of Cranbrook and Valentines in our proposed Ilford North constituency was supported, as this was perceived to unite the area around Gants Hill. However, our proposal was also opposed by others who felt that it divided the area from central Ilford, and that we had not recognised the A12 as a significant barrier between these two wards and the rest of Ilford North.
409. There was some opposition to our proposed Chingford and Woodford Green, and Walthamstow configuration, largely focused on the A406 North Circular Road. Several representations suggested that we consider new ward boundaries for the Borough of Waltham Forest and use the A406 as the boundary. The Order for this was made on 17 May 2021.
410. Our minor realignment of the Leyton and Wanstead constituency, to take account of ward boundary changes, was largely supported for recognising ties between Wanstead and South Woodford, with some opposition for breaking ties between South Woodford and the wider Woodford community.

### **Revised proposals**

411. As we had already proposed splitting a ward in the Borough of Havering, our Assistant Commissioners considered that splitting the three existing wards of Emerson Park, Hacton and St. Andrew's along new ward boundaries would be an acceptable solution in light of the conflicting evidence received regarding the Dagenham and Rainham, Hornchurch and Upminster, and Romford constituencies.
412. They considered that swapping Chadwell Heath ward for a different but still orphan ward from the Borough of Barking and Dagenham to be added to Ilford South would not provide a better solution than the initial proposals, as this would move the disruption and broken ties from Chadwell Heath ward to Becontree ward.
413. Our Assistant Commissioners considered splitting the Borough of Waltham Forest wards of Chapel End, and Hale End and Highams Park at the A406, but felt that the test for doing so had not been met, and that this would result in change to the existing Walthamstow constituency which was not otherwise required. We agreed with their view, and so changed the configuration of Dagenham and Rainham, Hornchurch and Upminster, and Romford and retained the initial proposals for Barking, Chingford and Woodford Green, Ilford North, Ilford South, Leyton and Wanstead, and Walthamstow.

### **Consultation on the revised proposals**

414. Our proposed splits of Emerson Park, Hacton and St. Andrew's were supported by those who wanted Emerson Park to stay as part of the Hornchurch and Upminster constituency, rather than to include it in the Romford constituency. Others felt that this resulted in more ward splits than necessary. There was a single request to take account of the new Havering-atte-Bower ward to further move the boundary between Hornchurch and Upminster, and Romford. A small number of respondents considered that, although we had united the Elm Park community, which crosses the

existing constituency boundary into Hacton and St. Andrew's wards, its community ties lie with Hornchurch, rather than with Dagenham, as we proposed.

415. A small number of representations cited our use of new ward boundaries in the Borough of Havering as precedent for a reconfiguration of the Barking, and Dagenham and Rainham constituencies on their new local government ward boundaries, as the Order for new boundaries in the Borough of Barking and Dagenham had been made on 15 December 2021. We received a small amount of opposition continuing the call for Chadwell Heath ward to be included in the Dagenham and Rainham constituency rather than the Ilford South constituency, but we also received some support for uniting the wider Chadwell area.
416. Opposition to South Woodford ward's inclusion in the Leyton and Wanstead constituency continued at a low level during the final consultation period, as was our decision not to divide wards between the Chingford and Woodford Green, and Walthamstow constituencies.

### **Final recommendations**

417. We are not persuaded by proposals to divide existing wards along new ward boundaries in areas where there does not already exist a need to divide those wards in order to comply more closely with the statutory factors. As we set out in our policy on splitting wards at the beginning of the review, we will only consider new ward boundaries made by Order after 1 December 2020 in instances where we are persuaded to split a ward between constituencies. There did exist a need to divide wards between the Romford, and Hornchurch and Upminster constituencies in order to minimise disruption across the sub-region, so it was appropriate to do so there, but not elsewhere in North East London. Having considered the evidence regarding other changes, we consider that sufficient justification for departing from our revised proposals has not been demonstrated.
418. Our final recommendations in this sub-region are therefore for constituencies of: Barking; Chingford and Woodford Green; Dagenham and Rainham; Hornchurch and Upminster; Ilford North; Ilford South; Leyton and Wanstead; Romford; and Walthamstow. These constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.

## **Newham and Tower Hamlets**

### **Initial proposals**

419. All four constituencies in this sub-region have electorates above the permitted range. The boroughs of Newham and Tower Hamlets have a combined electorate of a little over 368,000, giving it an entitlement to 5.02 constituencies. We therefore allocated five constituencies to the sub-region, one of which was proposed to be Stratford and Bow, crossing the River Lee, which is also the boundary between the boroughs of Newham and Tower Hamlets. We tried to reflect the existing constituencies as closely as practical in proposing an East Ham constituency including eight wards from the existing constituency. We added Beckton and Royal Docks wards to our proposed West Ham and Beckton constituency. Our proposed Poplar and Limehouse constituency included nine wards from the existing constituency, and our Bethnal Green and Stepney constituency included the Spitalfields and Whitechapel areas.

### **Consultation on the initial proposals**

420. Our proposed Bethnal Green and Stepney constituency generated little response during our first two consultation periods. Most of the comments received about Poplar and Limehouse were regarding the name, with suggestions that it should include a reference to Canary Wharf, Docklands, or Isle of Dogs. There was some concern at the inclusion of the Borough of Tower Hamlets ward of St. Katharine's & Wapping in our Poplar and Limehouse constituency rather than in the Bethnal Green and Stepney constituency, but this proposal also received some support.
421. Having a constituency which crossed the River Lee in the north of the sub-region was more supported than opposed, with the balance of views being that there are more and varied crossings between the Stratford and Bow areas than could be achieved by a southern crossing, between Blackwall and Canning Town, where the river is wider. Having a constituency formed from parts of two boroughs was opposed here, as it was almost everywhere it was proposed.
422. Our proposed East Ham constituency was almost unanimously supported, with the transfer of the Borough of Newham ward of Beckton to our proposed West Ham and Beckton constituency at the A13 Newham Way considered to be a logical boundary. There were some suggestions that the West Ham ward should be included in our proposed Stratford and Bow constituency due to its proximity to Stratford, and that we should consider the Borough of Newham's new ward boundaries, the Order for which was made on 17 May 2021.

### **Revised proposals**

423. Having considered the evidence, our Assistant Commissioners felt that the Borough of Tower Hamlets ward of St. Katharine's & Wapping had a similar riverside nature to its neighbours in our proposed Poplar and Limehouse constituency, and was divided by the A1203 Highway from the rest of the Bethnal Green and Stepney constituency. Making such a change would also require the division of the Stepney area, which they considered would break community ties. They considered that adding any of the suggestions to the Poplar and Limehouse name would either be superfluous, as those areas are part of Poplar or, in the case of Docklands, would encompass an area crossing both the River Lee and the Thames.
424. While acknowledging that the West Ham ward was felt by some to look towards the Stratford area, our Assistant Commissioners considered that removing it from the wider West Ham community would break ties here, and also across the Forest Gate area, as it would require the Green Street West ward being moved from the Stratford and Bow constituency into the West Ham and Beckton constituency. They felt that, as our proposed East Ham constituency was widely supported, it should remain unchanged for the revised proposals. Our Assistant Commissioners considered that, as there was no suggestion that we would need to split any wards across either borough, it would not be appropriate to consider the new ward boundaries for Newham. We agreed with all their recommendations and therefore proposed retaining our initial proposals for the five constituencies of Bethnal Green and Stepney, East Ham, Poplar and Limehouse, Stratford and Bow, and West Ham and Beckton.

### **Consultation on the revised proposals**

425. The only substantive request for Bethnal Green and Stepney was to change the name to Bethnal Green and Shadwell, to reflect that community's history and amenities. Poplar and Isle of Dogs emerged as the most popular suggested name for that constituency.

426. Opposition to the cross-borough constituency of Stratford and Bow continued at a low level. We received few responses to our proposals for East Ham, or West Ham and Beckton, with one reiterating West Ham ward's links with Stratford, and another suggesting that it be renamed Canning Town and Beckton.

### **Final recommendations**

427. We consider that including Shadwell rather than Stepney in the name of the Bethnal Green and Stepney constituency runs counter to the fact that Shadwell is smaller than Stepney and that Shadwell also appears to extend into our proposed Poplar and Limehouse constituency. We consider that adding Isle of Dogs instead of Limehouse to the name of Poplar and Limehouse would not necessarily better reflect the configuration of the constituency given that the area and the former Borough of Poplar includes Isle of Dogs in its entirety. We were provided with very little evidence of any more viable alternative to the Stratford and Bow constituency. Our East Ham, and West Ham and Beckton proposals were largely supported.
428. Our final recommendations in this sub-region are therefore for constituencies of: Bethnal Green and Stepney; East Ham; Poplar and Limehouse; Stratford and Bow; and West Ham and Beckton. These constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.

## **North Central London**

### **Initial proposals**

429. Our initial proposals treated North Central and North West London as one sub-region. There are currently 32 constituencies across these parts of London, and our initial proposals were also for 32 constituencies. This section of the report focuses on the North Central area, covering the boroughs of: Barnet; Camden; Enfield; Hackney; Haringey and Islington; which includes 13 existing constituencies, and the majority of one other. Of these the following are above the permitted electorate range: Chipping Barnet; Hackney North and Stoke Newington; Hackney South and Shoreditch; Hampstead and Kilburn (which includes part of our subsequent North West London sub-region); Hendon; Holborn and St Pancras; Hornsey and Wood Green; and Tottenham. The following are below the range: Edmonton; Enfield North; Enfield Southgate; and Islington South and Finsbury. Finchley and Golders Green, and Islington North have electorates within the permitted range.
430. In our initial proposals, we proposed three constituencies that would cross the A5 road: Stanmore and Edgware, that would cross between the boroughs of Barnet and Harrow; Hendon and Golders Green, that would cross between the boroughs of Barnet and Brent; and West Hampstead and Kilburn, that would cross between the boroughs of Camden and Brent. The Borough of Barnet was divided into five constituencies in our initial proposals. In addition to the two constituencies spanning the A5 which included parts of the Borough of Barnet, we proposed a Finchley and Muswell Hill constituency that would span the boroughs of Barnet and Haringey, and a Southgate and Barnet East constituency that would include two Borough of Barnet wards in an otherwise Borough of Enfield centred constituency. One proposed constituency, High Barnet and Mill Hill, was wholly contained within the Borough of Barnet.

431. In the Borough of Enfield, we proposed an Enfield North constituency and an Edmonton constituency that would be unchanged from the existing constituencies except for realignment with new local government ward boundaries. In the Borough of Haringey, we proposed a Tottenham constituency that would include two Borough of Hackney wards, while West Green and White Hart Lane wards were transferred to the Hornsey and Wood Green constituency. Our proposed Hackney North and Stoke Newington, and Hackney South and Shoreditch constituencies were based on the existing Hackney constituencies, although the Borough of Hackney ward of Dalston was included in the Islington North constituency under our initial proposals. We also proposed that Tufnell Park ward, from the Borough of Islington, be transferred to the Borough of Camden-based Kentish Town and Bloomsbury constituency, which would result in two orphan wards in this area. We proposed that the City of London be paired with the Borough of Islington in a City of London and Islington South constituency. Our third proposed constituency covering the Borough of Camden (in addition to Kentish Town and Bloomsbury, and West Hampstead and Kilburn) was Camden Town and St John's Wood, that crossed the borough boundary with Westminster.

### **Consultation on the initial proposals**

432. As described previously, this sub-region was largely opposed, due mainly to the breaking of community ties created by the number of borough boundaries that were crossed, and the consequent significant change to the existing pattern of constituencies. The A5 is considered by most to be a significant boundary to the communities on either side, between Barnet on the eastern side, and Brent and Harrow on the west. Others did note that the Edgware community includes a small part of the Borough of Harrow, but the majority of it lies in the Borough of Barnet. Our Hendon and Golders Green constituency was supported by community and faith groups, but opposed by those who felt that, as well as the A5 road, the Welsh Harp reservoir was a further substantial geographic barrier.
433. Our proposed Finchley and Muswell Hill constituency received a mixed response, with those in support mentioning community, transport and faith ties across the area, while those who opposed it cited the lack of such ties, and that we were dividing the Muswell Hill area. We received strong opposition to the inclusion of East Barnet and Brunswick Park wards in the proposed Southgate and Barnet East constituency. The East Coast Main Line railway, which we had considered a physical boundary across the area, was felt by many to be a uniting feature, particularly at New Barnet, which includes areas on both sides of the line. We received counter proposals to reduce the number of constituencies including wards from outside of the Borough of Barnet from the initially proposed four, to one, which were supported for preserving more community ties.
434. Our initial proposals for the Borough of Enfield attracted few comments, which perhaps reflects the limited change we proposed here. Our proposals across the Borough of Haringey were largely opposed. Many asserted that West Green ward is an integral part of the Tottenham constituency, and counter proposed that the Harringay ward should be transferred to the Hornsey and Wood Green constituency instead. A smaller number of people also said that White Hart Lane ward should remain in Tottenham, as part of it, the Tower Gardens Conservation Area, had been part of the constituency previously. A small number of counter proposals suggested splitting one or both of the West Green and White Hart Lane wards to keep those parts which identify most strongly as Tottenham within the proposed constituency. Some counter proposals also suggested linking Wood Green with Southgate, part of the Borough of Enfield, but these suggestions were also

opposed, in part because Wood Green is considered the civic centre of the Borough of Haringey, and to link it with any part of the Borough of Enfield would break community ties with the rest of the borough.

435. Our proposed inclusion of the two Borough of Hackney wards of Brownswood and Woodberry Down in the Tottenham constituency was almost unanimously opposed on the grounds of breaking community ties, particularly between the Stamford Hill West and Woodberry Down wards. Some suggested that the Brownswood ward should be part of an Islington North constituency, and a small number suggested that the transfer of the two wards made sense due to the physical divide created by Clissold Park and the Woodberry Wetlands and reservoirs.
436. Our inclusion of the Borough of Hackney ward of Dalston in our proposed Islington North constituency was opposed as this ward is considered by some as the heart of Hackney, and includes key community and cultural institutions for the borough. These objections gave rise to counter proposals that De Beauvoir ward would be better transferred to an Islington-based constituency if any part of the borough should be removed.
437. Including Tufnell Park in a Borough of Camden-based Kentish Town and Bloomsbury constituency was strongly opposed by those who felt that the area looked to the Borough of Islington for all its services and that they have few connections with the Borough of Camden, or Kentish Town in particular, but there was also a small amount of support who did see some links.
438. The City of London's transfer to our proposed City of London and Islington South constituency was supported by those residents in the City who saw education, entertainment and shopping links with the Borough of Islington, but opposed by those who wished to maintain the long-standing links with the City of Westminster.
439. In the Borough of Camden, our proposed Camden Town and St John's Wood, and West Hampstead and Kilburn constituencies were strongly opposed for dividing the close-knit Hampstead community, with many preferring a counter proposal for a Hampstead and Highgate constituency, similar to one which existed from 1983 to 2010. We did receive some support for our West Hampstead and Kilburn constituency, as some felt that the Kilburn High Road unites the areas on opposite sides of the boundary between the boroughs of Brent and Camden. Most counter proposals, however, chose to use the A5 road as the dividing line between the North Central and North West London sub-regions. As previously described, our initial proposals for the Kentish Town and Bloomsbury constituency were largely opposed due to the inclusion of Tufnell Park ward as an orphan ward from the Borough of Islington. We also received opposition to the proposed name of the constituency, with several respondents citing the long historical precedent of the name St Pancras and arguing that the existing constituency name of Holborn and St Pancras should be retained. There was some support for the composition of our proposed constituency, however, in light of the challenges faced in north London.

### **Revised proposals**

440. Our Assistant Commissioners considered the finely balanced and often conflicting evidence received during public consultation. Counter proposals in the Borough of Barnet focused on differences in which parts would need to be included with other boroughs while minimising change to existing constituencies. They recommended a pattern of constituencies which retained the Brunswick Park and East Barnet wards in the Chipping Barnet constituency, kept the Finchley

and Golders Green constituency unchanged apart from such changes as necessary due to new ward boundaries, transferred Edgwarebury ward into Chipping Barnet from Hendon, and included Friern Barnet in a Hornsey and Friern Barnet constituency.

441. When considering the boroughs of Enfield and Haringey, our Assistant Commissioners considered that counter proposals which swapped the Borough of Haringey wards of West Green and Harringay would provide for a Tottenham constituency broadly similar in configuration to the existing. They accepted that there was no ideal solution for the Borough of Enfield, given the minimal change they recommended in the Borough of Barnet. They therefore recommended Edmonton and Enfield North constituencies similar to the existing, and a Southgate and Wood Green constituency to include parts from both boroughs, thereby restricting significant change to a single constituency.
442. Across the boroughs of Hackney and Islington, our Assistant Commissioners were persuaded by the evidence to retain Islington North unchanged from its existing configuration, and to add the De Beauvoir ward from the Borough of Hackney to the Islington South constituency, which allowed them to recommend keeping Dalston ward in Hackney South and Shoreditch. They were unable to identify alternative patterns of constituencies which better reflected the statutory criteria than the initial proposals for Hackney North and Stoke Newington, particularly as it would result in significant consequential changes to the pattern of constituencies.
443. Our Assistant Commissioners considered that counter proposals for Borough of Camden constituencies based on the Hampstead and Highgate areas, and the existing Holborn and St Pancras constituency would provide for a coherent configuration. Their recommendations united the Hampstead area and both parts of Highgate even though one of the Highgate wards would be an orphan ward from the Borough of Haringey. We agreed with all their recommendations for the North Central London sub-region.

### **Consultation on the revised proposals**

444. Our revised proposals were largely supported across the majority of the Borough of Barnet, with significant opposition to the Friern Barnet ward being transferred to a Borough of Haringey-based constituency, with some suggesting that the ward should be divided at the A406 North Circular Road. There were a small number of counter proposals to either include the Edgwarebury ward in the Hendon constituency, or for the East Finchley ward to be the orphan ward added to a Borough of Haringey-based constituency. Both options would be likely to create more disruption to the Chipping Barnet, and Finchley and Golders Green constituencies than in the revised proposals.
445. In the Borough of Enfield, our revised proposals were heavily opposed for a number of reasons. In objecting to our reconfiguration of Enfield Southgate across three constituencies, one of which would extend from the north of the borough into the Borough of Haringey to create a Southgate and Wood Green constituency which crossed borough boundaries and the A406, respondents told us that there was little community of interest spanning such a long and thin area. The transfer of the Winchmore Hill ward to the Edmonton constituency and the transfer of the Grange Park ward to the Enfield North constituency both elicited much opposition, in part because people felt that these two wards formed a single community, although the transfer of the Grange Park ward did also receive a small amount of support. There was a general feeling expressed that the initial proposals were better across the Borough of Enfield, causing less disruption to existing constituencies than the revised proposals.



446. Our revised proposals for the Borough of Haringey were largely opposed, and considered more disruptive to communities than our initial proposals, as they split the borough across four constituencies, none of which would be entirely within the borough. Respondents opposed the division of the existing Hornsey and Wood Green constituency between three proposed constituencies, and our Southgate and Wood Green proposal, which paired the civic centre of the Borough of Haringey with parts of the Borough of Enfield.
447. In the Borough of Camden, our Hampstead and Highgate constituency was well supported, but with mixed views expressed on our linking the Highgate wards from the boroughs of Camden and Haringey. Some respondents considered that Hampstead Heath is a unifying feature, and others considered it a physical divide, and those on each side look more to their own borough rather than across the Heath. There was some opposition to our separation of the Kentish Town North ward from the Kentish Town South ward, one suggested solution being that Gospel Oak ward should be included in the Hampstead and Highgate constituency, and both wards of Kentish Town should be included in our Holborn and St Pancras proposal, but there was a counter argument that Gospel Oak should remain in the Holborn and St Pancras constituency. Apart from this, our revised Holborn and St Pancras constituency was largely supported, although there was a suggestion that it should be called Holborn and Camden Town. There was some opposition to our return to using the A5 road as the sub-region boundary, as residents felt that at its southern end, it was a local high street rather than a dividing feature.
448. Our Islington North revisions were unanimously supported. Our Islington South proposal received mixed views, both with regard to the name, which some felt should remain as Islington South and Finsbury, and opposition to the inclusion of De Beauvoir as an orphan ward from the Borough of Hackney.
449. We received few responses to our proposals for two Borough of Hackney-based constituencies other than as noted above regarding De Beauvoir ward being transferred to our proposed Islington South constituency. There was a suggestion that, as we had proposed dropping Finsbury from the name of Islington South, the two constituencies in this borough should be named Hackney North and Hackney South.

### **Final recommendations**

450. We considered a number of counter proposals for the Borough of Barnet which sought to resolve opposition across the boroughs of Enfield and Haringey, by returning to something similar to our initial proposals. Our investigations indicated that resolving these matters would require changes to a number of constituencies across this sub-region, including different configurations to those we had previously proposed. We identified a counter proposal that would modify the pattern of constituencies in the boroughs of Barnet, Enfield, and Haringey. We noted that, under this configuration, the boundary between the proposed Hendon and Golders Green constituency would be different, specifically, separating the Childs Hill and Golders Green wards, where we had received considerable evidence that these wards shared community ties. We therefore considered it necessary to visit the area. We noted little difference, and no discernible boundary between the two wards, which had the feel of a single community, and concluded that they should not be separated.

451. We also observed the boundary of the boroughs of Barnet and Enfield. In contrast, our visit to the East Barnet ward showed us that, although the New Barnet community and shopping area straddles the East Coast Main Line and boundary with the Barnet Vale ward, it also had a similar feel at its north-eastern corner with the Cockfosters ward in the Borough of Enfield, and the wider Cockfosters community, which appeared to us to cross that boundary. We observed that the railway is in a tunnel at the boundary between Brunswick Park and Whetstone wards, and so does not obstruct travel at all here. But, as at Cockfosters, Brunswick Park is extremely close to Southgate ward in the Borough of Enfield, and has a similar feel, particularly at its eastern corner. We felt that, as both wards looked to both Barnet and Enfield boroughs in some regards, this might give us flexibility to resolve opposition to our Enfield and Haringey proposals. Having investigated alternatives, we have not identified a different pattern of constituencies that we consider would better reflect the statutory factors. We acknowledge the considerable number of representations received concerning our proposed Southgate and Wood Green constituency, some of which commented on the geographic extent and shape of our proposed constituency. However, we noted that the existing Enfield Southgate constituency is not too dissimilar in terms of shape or extent given it extends from the north to the south of the borough. Finally, we have also been mindful of the support for the pattern of constituencies we proposed in our revised proposals in this part of the sub-region. As previously set out, this pattern would need to be completely reconfigured under any alternative.
452. However, we did reflect further on the evidence received suggesting that the Borough of Enfield wards of Grange Park and Winchmore Hill should be kept together in the same constituency, preferably in a Southgate-based constituency. We were not able to identify an alternative configuration that would achieve this outcome without significant disruption to the pattern of constituencies as outlined above. However, we noted a counter proposal that identified that the aforementioned wards could remain together, albeit as part of an Edmonton and Winchmore Hill constituency. This also required the transfer of the Ponders End ward from Edmonton to Enfield North to bring both constituencies within the permitted electorate range. Given the evidence received, we have decided to adopt this proposal as part of our final recommendations.
453. Although our revised proposals across the Borough of Haringey were largely opposed, we found that there was not persuasive evidence to depart from our revised proposals for the Hornsey and Friern Barnet, and Tottenham constituencies, as further change here would create more disruption across the rest of the sub-region.
454. The division of Kentish Town between two Borough of Camden constituencies cannot be resolved by a simple exchange including the Gospel Oak ward, but we did find that a split of the Primrose Hill ward might resolve some of the concerns across this area. We investigated this alternative and visited the area. We observed in the Kentish Town area that, while the railway between the two wards was a substantial physical feature, it did not divide the area, with the main shopping area crossing the railway. We visited the Primrose Hill ward to observe the proposed ward split and considered that the two sides of the ward are divided by the hill itself, with the Primrose Hill community being on the east side, and the west side being part of the wider Swiss Cottage area. Combined with transferring Gospel Oak ward into Hampstead and Highgate, both Kentish Town wards can be included in the Holborn and St Pancras constituency. We did not feel that a name change was appropriate, as Camden Town is not a new area for the constituency, which is broadly similar to the existing configuration. As views were divided regarding the Highgate wards,

we felt that there was not persuasive evidence to make any further change to our Hampstead and Highgate proposal.

455. No additional evidence has been received to warrant changing our proposals for the Islington North constituency. We are persuaded that retaining the name Islington South and Finsbury is appropriate, as it is similar to the existing constituency. Although this constituency includes the orphan De Beauvoir ward from the Borough of Hackney, we do not consider an alternative pattern would better reflect the statutory factors. Therefore, we have decided not to modify our revised proposals in the Borough of Hackney and confirm them as final.
456. Our final recommendations in this sub-region are therefore for constituencies of: Chipping Barnet; Edmonton and Winchmore Hill; Enfield North; Finchley and Golders Green; Hackney North and Stoke Newington; Hackney South and Shoreditch; Hampstead and Highgate; Hendon; Holborn and St Pancras; Hornsey and Friern Barnet; Islington North; Islington South and Finsbury; Southgate and Wood Green; and Tottenham. These constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.

## North West London

### Initial proposals

457. As noted previously, our initial proposals treated North Central and North West London as one sub-region. This section of the report focuses on the North West area, covering the boroughs of: Brent; Ealing; Hammersmith and Fulham; Harrow; Hillingdon; Hounslow, Kensington and Chelsea; that part of Richmond upon Thames which lies north of the River Thames; Westminster and the City of London, which includes 18 existing constituencies; and part of another. Of these, the following were below the permitted electorate range: Brent Central; Brent North; Brentford and Isleworth; Feltham and Heston; and Hampstead and Kilburn (which includes part of our subsequent North Central London sub-region). The following were above the permitted range: Chelsea and Fulham; Cities of London and Westminster; Ealing Southall; Kensington; Twickenham and Westminster North. The following were within the permitted range: Ealing Central and Acton; Ealing North; Hammersmith; Harrow East; Harrow West; Hayes and Harlington; Ruislip, Northwood and Pinner; and Uxbridge and South Ruislip.
458. In the Borough of Brent, we proposed a Brent Central constituency that was wholly within the borough, Hendon and Golders Green, and West Hampstead and Kilburn constituencies, both of which crossed the A5 into the boroughs of Barnet and Camden respectively, and a Kenton and Wembley West constituency, which included two wards from the Borough of Harrow. Our proposals for the Borough of Ealing were for minimal change. Ealing North was reconfigured solely to reflect new local government ward boundaries. We proposed moving the Walpole ward from Ealing Central and Acton to our proposed Southall constituency, and the Borough of Hammersmith and Fulham wards of College Park & Old Oak, and Wormholt into our proposed Ealing Central constituency. We paired the centre of Hammersmith with the Chiswick area of the Borough of Hounslow, and Fulham with part of Chelsea, to propose our Hammersmith and Chiswick, and Fulham and Chelsea West constituencies.

459. In the Borough of Harrow, we proposed a configuration for the Harrow constituency, taking account of new local government ward boundaries, and crossed the A5 to propose a Stanmore and Edgware constituency including two wards from the Borough of Barnet. Across the Borough of Hillingdon we proposed a Hayes and West Drayton constituency very similar to the existing Hayes and Harlington, altered only to take account of new local government ward boundaries, and proposed minor changes to the Ruislip, Northwood and Pinner, and the Uxbridge and South Ruislip constituencies for the same reason.
460. As we proposed including three Borough of Hounslow wards in the Hammersmith and Chiswick constituency, we needed to increase the number of electors in the Brentford and Isleworth constituency, and did so by including the Heston East ward, and the Borough of Richmond upon Thames ward of Whitton from the existing Twickenham constituency. As in our initial proposals we had paired the City of London with the Borough of Islington, as described previously, we grouped the Borough of Westminster with the Borough of Kensington and Chelsea and proposed Westminster and Chelsea East, and Kensington and Westbourne constituencies.

### **Consultation on the initial proposals**

461. Our initial proposals in the Borough of Brent generated few responses in comparison to other areas, but were mostly opposed. The inclusion of the Alperton ward in the Brent Central constituency was opposed due to its separation from the rest of the constituency by the West Coast Main Line, London Overground and Underground, Southern railways, and Wembley Brook. The division of the wider Wembley area between the Brent Central and the Kenton and Wembley West constituencies was opposed for its breaking of community ties. The separation of the Harlesden community of the Harlesden & Kensal Green, and Roundwood wards between the proposed Brent Central, and West Hampstead and Kilburn constituencies, respectively, was also opposed for breaking community ties. We received counter proposals to either create separate constituencies for Wembley and Willesden, or to return to configurations more similar to the existing Brent North and Brent Central constituencies. A partial counter proposal which did not deal with any consequential effects was also received, which tried to resolve the Harlesden issue.
462. We received strong opposition to our inclusion of the two Harrow wards of Kenton East and Kenton West in the Kenton and Wembley West constituency. Respondents argued that the boundary between the boroughs of Harrow and Brent along Kenton Road (A4006) is a hard and distinct boundary, and residents of the two Kenton wards in Harrow use local services in neighbouring Borough of Harrow wards (and vice versa), rather than in Brent. They contended that the initial proposals would break local ties in the south-eastern part of the Borough of Harrow. We received counter proposals for Harrow and Brent that would retain Kenton East and Kenton West wards in a Harrow East constituency that would include all the wards in the existing Harrow East constituency, except for Wealdstone North, together with Queensbury as an orphan ward from the Borough of Brent. Respondents noted that the boundary between the Borough of Brent ward of Queensbury and the Borough of Harrow ward of Edgware is porous, running along residential roads, and that the Jubilee Line runs from Stanmore down through Queensbury ward, providing a key transport link between the areas of the proposed constituency. There was notable support for this counter proposal in local representations. Other counter proposals joined the Stanmore and Queensbury areas, but in a narrower and more elongated constituency that would divide the Kenton East ward from Kenton West ward. The composition of our initially proposed Harrow constituency represented little change from the existing constituency and was well supported.

463. In the Borough of Ealing, we received considerable opposition to our proposed transfer of Walpole ward from the Ealing Central and Acton constituency to the Southall constituency. Respondents cited Walpole's strong ties with Ealing Broadway (the town centre area) and lack of connections with Southall. Many representations also opposed changing the name of the Ealing Southall constituency to simply Southall: residents of Hanwell Broadway, Northfield, and Walpole wards argued that they identified as part of Ealing, and advocated either retaining the current constituency name, or including West Ealing or Ealing West in the name. Some respondents, while opposing the name, did, however, support the inclusion of Walpole ward in the Southall constituency, describing Walpole ward's close ties with its neighbouring Hanwell Broadway and Northfield wards.
464. Response to our initially proposed Ealing Central and Acton constituency was mixed, with some objections to the inclusion of the two Borough of Hammersmith and Fulham wards of College Park & Old Oak, and Wormholt in the constituency. Residents from the south-eastern corner of Wormholt ward voiced the strongest opposition, arguing that they were connected with Shepherd's Bush and Hammersmith more widely, rather than Ealing or Acton. However, other respondents cited many shared local ties – including transport links, shopping facilities, and community organisations – across the boundary between the boroughs of Ealing, and Hammersmith and Fulham. They noted that Old Oak Common Lane, the borough boundary, is the principal shopping district for East Acton, a community that spans the two boroughs. Some respondents suggested that Old Oak should be included in the constituency name to recognise the expanding community in this area.
465. Response to our initial proposals for the Ealing North constituency was overwhelmingly positive, since no changes were proposed to the existing constituency except realignment with new local government ward boundaries.
466. Some counter proposals suggested maintaining the existing Ealing Central and Acton constituency unchanged (except for minor realignment with prospective local government ward boundaries) – enabling the Walpole ward to remain in the constituency, and the College Park & Old Oak, and Wormholt wards to be part of a Hammersmith-based constituency, but this required including North Hanwell ward in an Ealing Southall constituency, and the South Ruislip ward as an orphan from the Borough of Hillingdon in the Ealing North constituency. Another counter proposal suggested an unchanged Ealing Central and Acton constituency, and a Southall constituency that would include those parts of Heston East and Heston West wards (in the Borough of Hounslow) that lie north of the M4 motorway, thus requiring the splitting of two wards between constituencies.
467. In the north of the Borough of Hillingdon, we received some opposition to the division of the Harefield community, since our initial proposals included the Harefield Village ward in the Ruislip, Northwood and Pinner constituency and the Ickenham & South Harefield ward in the Uxbridge and South Ruislip constituency.
468. Counter proposals united Harefield by including the Harefield Village ward together with the Ickenham & South Harefield ward in the Uxbridge and South Ruislip constituency, and including Ruislip Manor ward in the Ruislip, Northwood and Pinner constituency. While acknowledging that our initial proposals would divide Harefield, other respondents contended that this alternative would result in more disruption to the existing constituencies, and that including Ruislip Manor

ward in a different constituency to South Ruislip ward would break ties between these two areas, and so supported our initial proposals.

469. Further south in the Borough of Hillingdon, the composition of our initially proposed Hayes and West Drayton constituency was largely supported. We did receive some representations advocating a return to the constituency's existing name of Hayes and Harlington, since our proposed constituency was almost identical to the existing constituency.
470. In the Borough of Richmond upon Thames (north), residents of the Whitton ward voiced strong opposition to our initial proposals, which would transfer Whitton ward from the existing Twickenham constituency to the Brentford and Isleworth constituency. Respondents argued that our initial proposals would divide the Whitton community, which also spans the Heathfield ward. Despite being separated by a railway line, respondents referred to the Whitton and Heathfield wards as one single cohesive community, with many local services and amenities shared between the wards. Concerns were also expressed over Whitton becoming an orphan ward in a Hounslow-based constituency. Residents said that they identified with the Twickenham area, in the Borough of Richmond upon Thames, rather than Hounslow.
471. Some representations proposed ways in which the Whitton ward could remain in the Twickenham constituency. One proposed transferring St Margarets & North Twickenham ward to the Brentford and Isleworth constituency instead of Whitton ward, and other respondents proposed transferring the Heathfield ward instead of Whitton ward. Another proposed splitting both St Margarets & North Twickenham ward and Twickenham Riverside ward, and transferring the eastern portions to the Richmond Park constituency across the River Thames, arguing that the eastern parts of these wards have close ties with Richmond. A further counter proposal suggested splitting both the Whitton and Heathfield wards between the Twickenham, and Brentford and Isleworth constituencies.
472. A small number of representations did, however, support our initial proposals for the Brentford and Isleworth constituency, noting strong community links between the Hounslow South and Whitton wards. Our proposed Feltham and Heston constituency was well supported in representations.
473. Our initial proposals for the Borough of Kensington and Chelsea generated very strong opposition: we received over 1,200 representations opposing the constituencies of Fulham and Chelsea West, Kensington and Westbourne, and Westminster and Chelsea East. Respondents expressed deep concern over the division of Chelsea into two constituencies, the division of South Kensington into three constituencies, and the division of the borough as a whole into three constituencies. Respondents also opposed the inclusion of three north Westminster wards (Harrow Road, Queen's Park, and Westbourne) in a Kensington-based constituency, noting the hard geographical barriers of the Grand Union Canal and the Great Western Main Line railway dividing north Kensington from north Westminster, and therefore the lack of local ties or shared community between the two areas.
474. In response to our proposed division of the Chelsea area into Chelsea East and Chelsea West constituencies, many representations drew attention to the King's Road – the 'historic central artery' of Chelsea – being divided into two constituencies. Respondents also argued that many quintessential Chelsea institutions and landmarks would be separated into different constituencies under our initial proposals, with the Royal Hospital (home to the Chelsea Pensioners) and Sloane

Square, for example, being included in a constituency with parts of the City of Westminster. Respondents further noted that our proposals would divide several conservation areas and 'character areas' in Chelsea.

475. Representations about the South Kensington area highlighted that the three South Kensington wards – Brompton & Hans Town, Courtfield, and Queen's Gate – would be included in three different constituencies, therefore breaking local ties. Several respondents noted that South Kensington tube station and the three South Kensington museums (the Natural History Museum, the Science Museum, and the Victoria and Albert Museum) would be included in a City of Westminster-based constituency. Courtfield ward, proposed to be included in the Fulham and Chelsea West constituency, was seen as a core South Kensington residential neighbourhood. It was also noted that our initial proposals would divide South Kensington conservation areas and residents' associations between constituencies.
476. There was some support for our initial proposals, particularly for the Kensington and Westbourne constituency, but the evidence in support was limited compared with the evidence against our initial proposals.
477. We received a strongly supported counter proposal which sought to closely reflect the existing Chelsea and Fulham constituency, thereby keeping the Chelsea community together. It would include a proposed Kensington and Bayswater constituency that would keep the South Kensington community together, too, and link Kensington with the City of Westminster wards of Bayswater and Lancaster Gate rather than the three wards to the north of the borough. Residents in support of this cited extensive community ties between the Notting Hill and Bayswater areas, noting that the borough boundary was far more porous here than further north.
478. Another counter proposal suggested the same Chelsea and Fulham constituency as above, but joined Kensington with the two City of Westminster wards of Westbourne, and Knightsbridge & Belgravia, rather than the Bayswater and Lancaster Gate wards. Residents of the Knightsbridge & Belgravia ward opposed this counter proposal, arguing that their community ties were with southern parts of Westminster rather than Kensington.
479. Some representations expressed concern over the inclusion of the whole of Brompton & Hans Town ward in a Kensington-based constituency as the ward comprises two historically distinct areas: the northern Brompton part that identifies as South Kensington, and the southern Hans Town part that identifies as Chelsea. Some respondents proposed that we split the Brompton & Hans Town ward between the Kensington constituency and the Chelsea and Fulham constituency, and consequently move all or part of Redcliffe ward to the Kensington constituency to bring both constituencies within the permitted electorate range. While noting that it was regrettable that the Hans Town area would not be included in a Chelsea constituency, others did not support such a split-ward solution.
480. As previously described, most representations regarding the City of London opposed it being joined with Islington South and advocated that it should remain paired with the City of Westminster. The majority of counter proposals presented a Cities of London and Westminster constituency based on the existing constituency. Some counter proposals suggested that the City of London should be joined with wards from the Borough of Camden as well as the City of Westminster. These respondents cited cultural, business, and transport links between the two

Borough of Camden wards of Bloomsbury, and Holborn & Covent Garden, and the surrounding areas in the cities.

481. Given the approach taken by many counter proposals to treat the A5 road as a dividing line until the City of Westminster, we received several proposals for a constituency crossing between the City of Westminster and the Borough of Brent – joining the most southern wards of Brent with the north-western wards of Westminster, albeit in different configurations. These noted the clear divide of the A5 between the boroughs of Brent and Camden contrasted with the residential roads that mark the Borough of Brent and City of Westminster boundary, with good transport links such as the A404 Harrow Road and the Bakerloo Line linking Edgware Road in the City of Westminster to Harlesden in the Borough of Brent.

### Revised proposals

482. Our Assistant Commissioners recognised that the counter proposals for two constituencies wholly within the Borough of Brent described earlier could be interchanged without affecting the wider pattern of constituencies. They noted that the counter proposal for the Brent Central and Brent North constituencies would reflect the existing constituencies more closely than the counter proposal for the Wembley, and Willesden and Kingsbury constituencies, but also that, under the former, the Alperton ward would still be included in the Brent Central constituency, as in our initial proposals, and isolated from the rest of the constituency. They were persuaded by the evidence provided in representations that this arrangement would break local ties in the Alperton ward and would not reflect the geography of the area. Our Assistant Commissioners considered that the inclusion of all the Wembley wards in one constituency would make considerable sense, reflecting those representations that had emphasised the cohesiveness of the Wembley wards. The Assistant Commissioners also noted that this would use the River Brent and an extensive portion of the A4140 road as a boundary between the Wembley, and Willesden and Kingsbury constituencies, which appeared to be a logical geographic boundary. They acknowledged that under both counter proposals the Harlesden & Kensal Green ward would be included in a different constituency to the Roundwood ward, and therefore local ties would potentially be broken in the Harlesden area. However, they considered that any alternative constituency configurations that kept the two wards together would result in knock-on disruption and the breaking of local ties elsewhere.
483. On balance, the Assistant Commissioners considered that the second counter proposal for Brent would better reflect the statutory factors overall than the first. They recommended, however, that the Willesden and Kingsbury constituency simply be named Willesden, since it would not encompass all of the Kingsbury community.
484. Our Assistant Commissioners were persuaded that the Harrow East constituency as proposed by several respondents would address the concerns from residents of the Kenton East and Kenton West wards, and would present an arrangement similar to the existing Harrow East constituency. While acknowledging it would not be ideal to include the Queensbury ward as an orphan ward from the Borough of Brent, they considered that the ward would make a logical extension to the constituency, given the permeability of the borough boundary along the northern edge of the ward, and the arguments set out in representations. The Assistant Commissioners therefore recommended that the counter proposal for a Harrow East constituency, as outlined above, should be adopted.



485. Since the composition of our initially proposed Harrow constituency was well supported, and represented little change from the existing constituency, our Assistant Commissioners did not recommend any revisions to the composition of this constituency. However, they recommended naming the constituency Harrow West, as they considered that the existing name should be retained because the constituency would remain largely unchanged, and that it made sense to mirror the compass point reference in the Harrow East constituency.
486. In light of their assessments across the boroughs of Ealing, and Hammersmith and Fulham, our Assistant Commissioners recommended no changes to our initial proposals for the constituencies of Ealing North, Ealing Central and Acton, and Southall, except for reverting the name of our initially proposed Southall constituency to Ealing Southall. They also recommended no changes to our initial proposals for the Hammersmith and Chiswick constituency.
487. Our Assistant Commissioners saw merit in the counter proposal which united both the Harefield wards of the Borough of Hillingdon in the Uxbridge and South Ruislip constituency, and which transferred the Ruislip Manor ward to the Ruislip, Northwood and Pinner constituency. They noted that this solution would address representations from the Harefield area and, while they acknowledged concerns over local ties being broken between Ruislip Manor and South Ruislip wards, they observed that Ruislip Manor ward is geographically divided from South Ruislip ward by Yeading Brook and the Chiltern Main Line railway line. They also considered that the alternative solution would unite more of Ruislip town centre in the same constituency. Conversely, the Assistant Commissioners did acknowledge that the alternative solution would represent greater change from the existing constituencies than our initial proposals, and would pair the densely populated Uxbridge area with rural Harefield. Emphasising the finely balanced nature of the decision, the Assistant Commissioners recommended that the alternative solution for the constituencies of Uxbridge and South Ruislip, and Ruislip, Northwood and Pinner, should be adopted: they considered that this would provide a better reflection of the local ties overall.
488. Further south in the Borough of Hillingdon, our Assistant Commissioners observed that the composition of our initially proposed Hayes and West Drayton constituency was largely supported; accordingly, they recommended no changes to the composition of this constituency, but in noting the representations on the name, they recommended that its existing name of Hayes and Harlington should be retained in light of the local support.
489. Our Assistant Commissioners considered that the evidence in opposition to our initial proposals for the Whitton ward was more compelling than that in support, but they found that the counter proposals to resolve this either left the Whitton community divided, as in the split-ward or Heathfield ward solutions detailed earlier, created constituencies that were not within the permitted electorate range, or relied on constituencies being created which crossed the River Thames, which has been widely accepted as the sub-region boundary.
490. Following their analysis, and further noting that our proposed Feltham and Heston constituency was well supported in representations, our Assistant Commissioners concluded that no alternative option or counter proposal would better reflect the statutory factors overall than our initial proposals for Richmond upon Thames (north) and Hounslow. Therefore, the Assistant Commissioners recommended no changes to the initially proposed constituencies of Brentford and Isleworth, Feltham and Heston, and Twickenham.

491. Recognising the strength of opposition to our initial proposals in the Borough of Kensington and Chelsea, and the quality of evidence received, our Assistant Commissioners carefully considered the counter proposals received. They concluded that the widely supported counter proposal would effectively address the issues raised in representations and present a logical solution for the constituencies of Chelsea and Fulham, and Kensington and Bayswater. They considered that the proposal to include the City of Westminster wards of Bayswater and Lancaster Gate in the Kensington-based constituency would make more sense in terms of community ties than would the alternative of the wards of Knightsbridge & Belgravia, and Westbourne. They noted the suggestion for splitting the Brompton & Hans Town ward and Redcliffe ward, in order to include the Hans Town area in the Chelsea and Fulham constituency, but they concluded that there was insufficient justification for splitting a ward since there was no wider benefit to be gained beyond the immediate location. In light of their analysis, the Assistant Commissioners recommended that the more widely supported counter proposal for the constituencies of Chelsea and Fulham, and Kensington and Bayswater, be adopted.
492. Before settling on a recommendation for a constituency joining the City of London with Westminster, our Assistant Commissioners noted the proposal for a constituency that would join the City with parts of Camden and Westminster, but as this would involve combining three local authorities in one constituency, and it would not align with their preferred new sub-regions, the Assistant Commissioners did not pursue this approach.
493. Our Assistant Commissioners observed that either the Abbey Road or Church Street ward – both located directly to the east of the A5 – could be included in their Cities of London and Westminster constituency. Most representations supported including the Abbey Road ward in a Cities of London and Westminster constituency, and Church Street ward in a Paddington and Kilburn constituency. Others included the Abbey Road ward in a Paddington and Kilburn constituency and the Church Street ward in a Cities of London and Westminster constituency.
494. Our Assistant Commissioners visited the area to help them decide which was the most appropriate solution for the Abbey Road and Church Street wards. Their observations showed that the Church Street ward was somewhat separated from the wards to its north, south, and east by the Grand Union Canal, Marylebone Road, and the Chiltern Main Line railway. In contrast, they observed the shared community of St John’s Wood between the Abbey Road and Regent’s Park wards to its east. Walking down the A5, the Assistant Commissioners noted that the road narrowed between the Church Street ward and Little Venice ward to its west, with increasingly more shops and cafes on either side of the road, and a lively sense of community cohesion. The Assistant Commissioners therefore concluded that the Church Street ward would fit better with the Paddington and Kilburn constituency, and the Abbey Road ward with the Cities of London and Westminster constituency.
495. They recommended, however, that the Paddington and Kilburn constituency be named Queen’s Park and Little Venice, to reflect the community of Queen’s Park spanning the Brent-Westminster borough boundary, and to capture an identifiable area of the Westminster part of the constituency.

### **Consultation on the revised proposals**

496. Our revised proposals attracted a mixture of support and opposition across the Borough of Brent. While our Wembley and Willesden constituency proposals were largely supported, the division of the Harlesden community between both constituencies was opposed, and counter proposals

were received which attempted to keep them together. One of these provided constituencies broadly similar to ours in the Borough of Brent, but which in consequence created an almost discontinuous Harrow West constituency. Another sought to split the ward of Harlesden & Kensal Green in order to minimise the division of the area, but did so at the centre of Harlesden's shopping area.

497. The names of our proposed Wembley and Willesden constituencies were opposed by those who considered the existing names of Brent North and Brent Central were appropriate, given their similar configuration to the existing constituencies. Others considered that the Willesden constituency should be named Brent, without any further designator. Both the name and configuration of our Queen's Park and Little Venice constituency were opposed. Some wanted Kilburn mentioned in the name, or Maida Vale, and arguments against its configuration focused on the lack of a single community identity or coherence across the area, citing wealth disparities across its extent.
498. Our revised proposals for two constituencies in the Borough of Harrow were largely supported, with only little opposition to the Borough of Brent ward of Queensbury being included as an orphan ward. We received several alternative name suggestions for both, with suggestions that the Harrow East constituency be named Stanmore and Queensbury, and for Harrow West to be named Harrow, Harrow Central, or Harrow on the Hill.
499. Opposition continued, albeit at a lower level, to our including the Borough of Ealing Walpole ward in the Ealing Southall constituency due to its proximity and ties with the Ealing Broadway ward and the rest of our Ealing Central and Acton constituency. We also received mixed views on the inclusion of the two Borough of Hammersmith and Fulham wards of College Park & Old Oak, and Wormholt, in our Ealing Central and Acton proposal, with competing views on whether this configuration reflected community ties. We also received suggestions that the Ealing North constituency should instead be named Greenford and Northolt, and that the Ealing Central and Acton constituency should be named Acton and Central Ealing, Ealing Acton, or Ealing and Acton.
500. We received continued support for our proposed Hammersmith and Chiswick constituency. We also received again the counter proposal to include the Borough of Ealing ward of Southfield, as this includes part of the wider Chiswick community, making this a three-borough constituency, and to consequently transfer the Borough of Hammersmith and Fulham wards of White City and Shepherd's Bush Green to the Ealing Central and Acton constituency. It was separately suggested that the White City ward be included in the Ealing Central and Acton constituency, and Wormholt ward in the Hammersmith and Chiswick constituency.
501. Very few comments were received regarding our proposed Borough of Hillingdon constituencies, other than to rename the Hayes and Harlington constituency as either Hayes and Heathrow, or Hayes and West Drayton. We received little further evidence regarding our including the Harefield and South Harefield villages in our proposed Ruislip, Northwood and Pinner constituency. Rather, we received evidence that the Ruislip Manor ward would have its strong local ties with the South Ruislip ward broken if we were to proceed with our revised proposals for this and the Uxbridge and South Ruislip constituency. Those respondents who commented on this area largely supported we revert to the initial proposals.

502. Residents of the Borough of Richmond upon Thames ward of Whitton maintained their strong opposition to being included in the Borough of Hounslow-based constituency of Brentford and Isleworth. We received further counter proposals to split the Whitton ward or the Hounslow West ward, or the Hounslow Central ward combined with a more significant reconfiguration to create constituencies of Feltham and Hanworth including the Heathfield ward, which includes part of the Whitton community, Heston and Isleworth, and a Twickenham constituency which would include the Whitton ward. It was also suggested that Brentford and Isleworth be named Brentford and Hounslow Town. Our proposals for Brentford and Isleworth, and Feltham and Heston constituencies received very few other comments.
503. Our revised proposals across the City of London, City of Westminster, and the Borough of Kensington and Chelsea were largely supported. Returning the City of London to a City of London and Westminster constituency was welcomed, as were the Kensington and Bayswater, and Chelsea and Fulham constituencies. Residents of the Hans Town part of the Borough of Kensington and Chelsea ward of Brompton & Hans Town maintained their suggestion to be included in the Chelsea and Fulham constituency, suggesting that the ward either be split, or that the Redcliffe ward be included in the Kensington and Bayswater constituency instead. A further counter proposal was received for a City of Westminster and Kensington South constituency including the City of London, and therefore including parts of three boroughs, and a Kensington North constituency including the City of Westminster wards of Harrow Road, Queen's Park, and Westbourne. Two name changes were suggested, Fulham and Chelsea, as Fulham would be the larger part of the reconfigured constituency, and Kensington and Lancaster Gate.

### **Final recommendations**

504. We visited Harlesden in the Borough of Brent in order to ascertain whether the proposed split of the Harlesden & Kensal Green ward might help to avoid dividing the wider Harlesden community, travelling on into the Roundwood ward to observe links between the two wards. We observed that Harlesden has an extensive and busy town centre area, contained within the Harlesden & Kensal Green ward, whereas the Roundwood ward is more residential, with some smaller parades of shops along Church Road (A407). We noted that the counter proposal that suggested the ward split would use Park Parade and part of Harlesden High Street as a constituency boundary. On visiting these areas, we observed that they are very much part of Harlesden's cohesive town centre, with shops and local amenities either side of the roads. Therefore, we considered that dividing the ward as such would divide the centre of Harlesden, and accordingly we were not persuaded by this counter proposal. The alternative counter proposal to keep both wards together and in a single constituency created substantial disruption to the existing pattern of constituencies across the Borough of Harrow. We were not, therefore, persuaded by this alternative proposal and we concluded that our revised proposals provided the most appropriate configuration across the borough. We considered the names for the two Brent constituencies and concluded that their orientation directed us to name them Brent East, and Brent West. Our consideration of the evidence provided found that our proposed Queen's Park and Little Venice constituency crossed the A5 where it formed a community shopping area for both sides of the road, and had good transport links between otherwise disparate areas. We agreed with those who considered that a reference to Maida Vale should be included in the name.

505. Our revised proposals for the Harrow East and Harrow West constituencies were largely supported. We do not consider the suggested names to be any more appropriate than those we proposed, and consider that the compass point designators provide for appropriate distinction between the constituencies, and the borough.
506. We are not persuaded that the evidence to change our revised proposals across the Borough of Ealing is persuasive, as attempting to resolve the inclusion of Walpole ward in the Ealing Central and Acton constituency would result in more substantial change to the existing constituencies than we propose. Nor are we persuaded to change any of our proposed names, given that the configuration of each of the three constituencies is similar to the existing constituencies of Ealing Central and Acton, Ealing North, and Ealing Southall, and that the Acton community extends across the boundary into the College Park & Old Oak, and Wormholt wards we are including from the Borough of Hammersmith and Fulham.
507. Our revised proposals across the Borough of Hillingdon were largely supported, apart from concerns that our revised proposal now divided the communities in the Ruislip Manor area. We have considered the evidence received concerning the Harefield and Ruislip Manor areas in all consultation periods. We considered that the evidence received concerning Ruislip Manor to be more persuasive. Therefore, under our final recommendations, we have reverted to our initial proposals for the two constituencies of Ruislip, Northwood and Pinner, and Uxbridge and South Ruislip. It was suggested by some respondents that this constituency be named Uxbridge but, as it is similar in configuration to the existing constituency, we considered that it would not be appropriate to remove the name of a substantial part of the constituency.
508. We have not received sufficiently persuasive evidence to change our revised proposals for the Borough of Hounslow. We note the opposition to the inclusion of the Borough of Richmond upon Thames ward of Whitton in the Brentford and Isleworth constituency, but consider that the counter proposals continue to divide the wider Whitton area, either by splitting this ward, by including the Heathfield ward in a neighbouring constituency instead of the Whitton ward, or crossing the sub-region boundary at the River Thames when this boundary is widely accepted as appropriate to the wider pattern of constituencies.
509. When considering the evidence for further change across the Borough of Kensington and Chelsea, and the City of Westminster, we note that the counter proposal to include the Borough of Kensington and Chelsea ward of Brompton & Hans Town in the Chelsea and Fulham constituency would also move much of the South Kensington area, including its London Underground station, and the museums and galleries that we were told should remain in a Kensington-based constituency. Dividing the ward might mitigate this, but we consider that this would not resolve any larger issues across the sub-region or region and so does not meet our criteria for doing so. In fact, it would require the splitting of an additional ward, creating further consequential changes to our proposed Kensington and Bayswater constituency. With regard to the names, as Bayswater is a larger area than Lancaster Gate, and the proposed Chelsea and Fulham constituency is so similar to the existing configuration, we consider our revised proposal names to be the most appropriate in light of all the evidence received. We note the broad support for our revised Cities of London and Westminster constituency, and propose no further change.
510. Our final recommendations in this sub-region are therefore for constituencies of: Brent East; Brent West; Brentford and Isleworth; Chelsea and Fulham; Cities of London and Westminster;

Ealing Central and Acton; Ealing North; Ealing Southall; Feltham and Heston; Hammersmith and Chiswick; Harrow East; Harrow West; Hayes and Harlington; Kensington and Bayswater; Queen's Park and Maida Vale; Ruislip, Northwood and Pinner; Twickenham; and Uxbridge and South Ruislip. These constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.

## South West London

### Initial proposals

511. Our initial proposals treated South Central and South West London as one sub-region. There are currently 19 whole constituencies across these parts of London, and the majority of another constituency. Our initial proposals were for 21 constituencies. This section of the report focuses on the South West area, covering the boroughs of: Kingston upon Thames; Merton; that part of Richmond upon Thames which lies south of the River Thames; Sutton; and Wandsworth, which includes nine existing constituencies. Of these, Putney and Wimbledon fell below the permitted electorate range. Battersea, Kingston and Surbiton, and Richmond Park were above the permitted range. The following had electorates within the permitted range: Carshalton and Wallington; Mitcham and Morden; Sutton and Cheam; and Tooting.
512. In the southern part of the Borough of Richmond upon Thames, we proposed a Richmond Park constituency that included three wards from the Borough of Kingston upon Thames, one more than currently, but would not include the Coombe Vale ward, as does the existing constituency. We proposed a Kingston and Surbiton constituency contained entirely within the Borough of Kingston upon Thames. We included two Borough of Kingston upon Thames wards in our proposed Wimbledon constituency, which otherwise comprised wards from the Borough of Merton. We proposed a Mitcham and Morden constituency which included the Cannon Hill ward, and transferred the Longthornton ward to our proposed Croydon North constituency as an orphan ward from the Borough of Merton. Our proposed Carshalton and Wallington, and Sutton and Cheam constituencies, both wholly contained within the Borough of Sutton, were changed solely to reflect new local authority ward boundaries. In the Borough of Wandsworth, we were able to retain the Tooting constituency unchanged, and bring the Battersea, and Putney constituencies within the permitted electorate range by splitting the Fairfield ward, moving a single polling district between them at the A214 road.

### Consultation on the initial proposals

513. In the Borough of Merton, we received over 200 representations opposing our proposed transfer of the Longthornton ward from the Mitcham and Morden constituency to the Croydon North constituency. Residents argued that they look to Mitcham, and the Borough of Merton more widely, for local services and amenities including schools, community groups, healthcare services, leisure facilities, and places of worship. Our initial proposals were therefore said to break local ties in Longthornton ward. Concern was also expressed over the ward becoming an orphan ward in a Croydon constituency. Respondents also contended that transferring the Longthornton ward to the Croydon North constituency would leave its neighbouring Pollards Hill ward geographically isolated. Several counter proposals sought to include the Longthornton ward in the Mitcham and Morden constituency, thus addressing this feedback from representations.

514. Elsewhere in the Borough of Merton, we received notable opposition to our proposed transfer of the Cannon Hill ward from the Wimbledon constituency to the Mitcham and Morden constituency. Residents contended that our initial proposals would break community ties, since they relied on local services, transport links, and social and recreational facilities in neighbouring Wimbledon wards, rather than in the Mitcham or Morden areas, which they rarely visited.
515. A number of respondents questioned why parts of Morden town centre, including Morden tube station and parts of the shopping area (at the southern end of Merton Park ward) would be included in our proposed Wimbledon constituency rather than the Mitcham and Morden constituency. Although the Merton Park ward is in the Wimbledon constituency currently, respondents took the view that all of Morden town centre should be in the Mitcham and Morden constituency.
516. One counter proposal included the Cannon Hill ward in the Wimbledon constituency and divided the Merton Park ward between the Wimbledon, and Mitcham and Morden constituencies. The authors noted that polling district data was not available for the Borough of Merton, since the wards were prospective, but they observed that the new Merton Park ward was very similar to the existing one. They therefore proposed transferring the existing RC polling district, comprising the southern half of the ward, to the Mitcham and Morden constituency – thereby uniting all of Morden town centre. They also proposed transferring the Wandle ward from the Wimbledon constituency to the Mitcham and Morden constituency. A number of respondents supported this. Other counter proposals included the whole of the Merton Park ward in the Mitcham and Morden constituency, in place of the Cannon Hill ward, and did not suggest a transfer of the Wandle ward. The proponents of this counter proposal argued that the Merton Park ward would be a better fit with the Mitcham and Morden constituency than the Cannon Hill ward because Merton Park contains part of Morden town centre.
517. Representations acknowledged that the Wimbledon constituency needed to gain electors from the Borough of Kingston upon Thames in order to bring it within the permitted electorate range. Our initial proposals to include the St. James and Old Malden wards, however, were almost unanimously opposed. Respondents noted that the St. James ward in particular looks to New Malden High Street (in Beverley ward) for local services, shopping, and community facilities. Residents of Old Malden ward said that they gravitate to Worcester Park (in the Borough of Sutton) or New Malden for local shopping and amenities – and if travelling further afield, they would look to Kingston Town or even Epsom and Ewell in Surrey, rather than Wimbledon. The railway line connecting Malden Manor with Wimbledon was seen as a physical barrier rather than a unifier and that most people regard it as a hard boundary to road traffic because of the railway level crossing at West Barnes Lane.
518. Some respondents put forward the same counter proposal for the boroughs of Kingston upon Thames and Richmond upon Thames, albeit with different constituency names. They proposed including the Borough of Kingston upon Thames wards of Coombe Hill and Coombe Vale in the Wimbledon constituency, rather than the St. James and Old Malden wards. This proposal was generally well supported in representations. Residents argued that the two Coombe wards are a single community which would be divided into different constituencies under our initial proposals and that they look to Wimbledon for retail and leisure services. Respondents drew attention to Coombe Lane (A238) as a road and bus link between Coombe and Wimbledon, and emphasised that Wimbledon Common was a shared amenity, in addition to other shared amenities such

as schools and Kingston Hospital. Some respondents pointed out that certain residents of the two Coombe wards are eligible to vote for 'Conservators' responsible for the preservation of Wimbledon Common, and must pay a levy towards the management of Wimbledon and Putney Commons, making it a shared political and financial connection.

519. Others expressed some concern at the proposed transfer of the Coombe Hill and Coombe Vale wards to the Wimbledon constituency. While acknowledging that it was no more disruptive than our initial proposals, they were concerned that Wimbledon Common and the A3 road, which at this point is a six-lane highway, divides the Coombe wards from Wimbledon.
520. Under the counter proposal that transfers the Coombe wards rather than the Malden wards to the Wimbledon constituency, Grove ward, comprising Kingston town centre, was transferred to the Richmond Park constituency. It was argued that Grove ward has coherent links northwards to the residential Canbury and Tudor wards (as demonstrated by the Kingston Town neighbourhood committee that covers these three wards), and that the River Thames binds Kingston town centre to Richmond. It was noted that the Norbiton ward, directly east of Grove ward, could also be considered for transfer to the Richmond Park constituency, but respondents suggested that Norbiton's links northwards were much poorer than were Grove's links northwards. In arguing the case for including the Grove ward in the Richmond Park constituency, it was asserted that this arrangement would unite Kingston town centre. Concern, however, was expressed that the transfer of Grove ward would distance Kingston town centre from its surrounding communities such as Surbiton, which look to Kingston for their main services and amenities.
521. Another counter proposal submitted that the Beverley and St. James wards should be included in the Wimbledon constituency, thereby retaining the Old Malden ward in a Kingston and Surbiton constituency. This was in support of our initial proposals for the Richmond Park constituency and therefore did not propose the transfer of the Grove ward. Other counter proposals received for this part of London were primarily those that suggested crossing the River Thames in one or more constituencies. We received some requests from respondents in the Borough of Kingston upon Thames to consider using the new local government ward boundaries for the borough. The Order for new wards in Kingston upon Thames was made in April 2021, and the new wards came into effect at the May 2022 local elections – well after the statutory cut-off date.
522. Our initial proposals for the boroughs of Sutton and Wandsworth were well supported, since they presented very minimal change from the existing constituencies in these boroughs, and continued to wholly align to their respective borough boundaries.
523. In the Borough of Wandsworth, respondents accepted that our proposed split of the Fairfield ward was necessary in order to prevent a reconfiguration of all three Wandsworth constituencies. One highlighted that splitting the ward along the A214 road, as we proposed, would actually better reflect community ties in the area, since the road represents a natural boundary between the Battersea and Wandsworth communities. Others advocated using the Borough of Wandsworth's new local government ward boundaries – similarly to Kingston upon Thames, the Order for new wards in Wandsworth was made in April 2021 and implemented in May 2022. They suggested how the new wards may be grouped into three Wandsworth constituencies, but did not provide any electorate numbers or estimations. Others considered that the new boundaries need not be considered. We received a request to incorporate the northern tip of the existing Earlsfield ward



into the Putney constituency, to avoid the creation of a polling district containing one elector for future general elections.

### Revised proposals

524. In assessing the representations and counter proposals received for the boroughs of Merton, Kingston upon Thames, and Richmond upon Thames, our Assistant Commissioners noted that it was possible to retain the Longthornton ward in the Mitcham and Morden constituency without any consequential implications to the overall pattern of constituencies in the Borough of Merton. They were persuaded by the many representations from Longthornton ward that it should be included in a constituency with Mitcham, not with Croydon. They were also persuaded by the evidence that the Cannon Hill ward has ties to Raynes Park and the wider Wimbledon area. They considered that the Merton Park ward would make a better fit with the Mitcham and Morden constituency than the Cannon Hill ward, since the Merton Park ward encompasses parts of Morden town centre.
525. Our Assistant Commissioners considered that the split of the Merton Park ward as suggested in a counter proposal had some merit in terms of community ties at the northern and southern extents of the ward, but that it would divide the residential Merton Park neighbourhood in the middle of the ward. The split would also require the transfer of the Wandle ward from the Wimbledon constituency to the Mitcham and Morden constituency, but the Assistant Commissioners considered that the Wandle ward has stronger ties to Wimbledon. They noted that the split of the Merton Park ward was not necessary for the integrity of this particular counter proposal: the Merton Park ward could be wholly transferred to Mitcham and Morden, and the Wandle ward could remain in Wimbledon, without impacting the counter proposal for the rest of the Merton, Kingston, and Richmond areas.
526. In determining which Borough of Kingston upon Thames wards to include in the Wimbledon constituency, our Assistant Commissioners were persuaded by the evidence that the two Coombe wards would make a more logical extension to the constituency than the initially proposed Old Malden and St. James wards. They considered that the counter proposal would keep the three Malden wards together, and the two Coombe wards together, and they considered that there was persuasive evidence of community ties between Coombe and Wimbledon. They considered the counter proposal to transfer the Beverley and St. James wards to the Wimbledon constituency would present some of the same issues that arose at the initial proposals consultation, in terms of dividing the Malden community. Furthermore, they considered it would also make the Old Malden ward particularly isolated.
527. While acknowledging it may not be ideal to transfer the Grove ward to the Richmond Park constituency, given the potential breaking of local ties between Kingston town centre and its surrounding communities in Surbiton, Norbiton, and further afield, our Assistant Commissioners ultimately considered that the counter proposal would enable a pattern of constituencies in the Borough of Kingston upon Thames that better reflected the statutory factors than our initial proposals. If one ward was required to be transferred to the Richmond Park constituency, they considered that the Grove ward would make a more logical choice than the Norbiton ward. They noted that the narrow salient extending at the east of Grove ward accommodated a waste disposal centre rather than a residential area, so they were not concerned by the unusual shape of the resultant constituencies.

528. In light of their assessments, our Assistant Commissioners recommended the adoption of the counter proposal, as considered above, for the boroughs of Kingston upon Thames and Richmond upon Thames, namely, a Richmond Park and Kingston Town constituency, and a Surbiton and The Maldens constituency. They noted the requests we had received to consider the new ward boundaries in the Borough of Kingston upon Thames, but determined that this was unnecessary given they were not persuaded to split any ward. The Assistant Commissioners subsequently recommended the adoption of a Wimbledon and Coombe constituency retaining the Wandle ward and not including any part of the Merton Park ward. They then recommended a Mitcham and Morden constituency including the whole of the Merton Park ward.
529. Given the support received for our proposed Carshalton and Wallington, and Sutton and Cheam constituencies, our Assistant Commissioners recommended to not change them as part of the revised proposals.
530. Our Assistant Commissioners noted those representations suggesting a pattern of constituencies using the new ward boundaries in the Borough of Wandsworth but, as was the case with the Borough of Kingston upon Thames, they were not persuaded that splitting multiple wards across the borough was necessary. They recognised, however, that our policy allows for the consideration of new ward boundaries when determining exactly how to split a ward, and therefore investigated whether the existing Fairfield ward could be divided in a different way to better align with Wandsworth's new ward boundaries. They discovered, however, that such a solution was not practicable. In light of their assessments, our Assistant Commissioners recommended no changes to our initial proposals for the Borough of Wandsworth, and we agreed.
531. We agreed with our Assistant Commissioners' recommendations for the Borough of Merton, but had reservations over whether their recommendations for the Borough of Kingston upon Thames were an improvement over our initial proposals, noting that the A3 road in this area presents a significant barrier between Coombe and Wimbledon. We also had concerns regarding the transfer of the Grove ward to a Richmond-based constituency, since this ward contains Kingston town centre and therefore provides key services and amenities for residents across the existing Kingston and Surbiton constituency. We did accept, however, our Assistant Commissioners' arguments that their recommendations responded to consultation feedback, and did not break ties within the distinct Malden community and within the distinct Coombe community, and included them in our revised proposals in order to consult on them publicly. However, we proposed that their recommended Richmond Park and Kingston Town constituency should be called Richmond Park and Kingston Central.
532. We agreed with their assessments and proposed that our initial proposals for the boroughs of Sutton and Wandsworth should be maintained.

### **Consultation on the revised proposals**

533. Our revised proposals in the boroughs of Kingston upon Thames and Richmond upon Thames were strongly opposed. Respondents informed us that including the Grove ward from the Borough of Kingston upon Thames in a Richmond-based constituency would separate the main shopping area for the borough from many of its users across the Surbiton area, and from the Norbiton ward in particular, which looks towards the Grove ward for their local services. Residents across the Borough of Kingston upon Thames were concerned that Kingston Hospital would now

be in the Wimbledon and Coombe constituency, as this lies within the Coombe Hill ward. There was also a feeling expressed that our proposed Surbiton and The Maldens constituency lacked cohesion and identity, as its local centre would now be part of the Richmond Park and Kingston Central constituency while the new constituency would have no centre. There was a small amount of support for the Coombe wards to be included in a Wimbledon-based constituency, but this was mainly from residents of the Wimbledon area, rather than from Coombe residents. Suggestions to use the new ward boundaries for the Borough of Kingston upon Thames were repeated.

534. The inclusion of the Borough of Merton ward of Merton Park in our proposed Mitcham and Morden constituency was strongly opposed, with residents saying that their ties, both economically and culturally, were all with Wimbledon rather than Morden, in spite of the close proximity of the ward to the rest of Morden, and that it includes Merton Civic Centre, Morden station, and much of Morden's shopping area. Counter proposals were suggested which split the Merton Park and Wandle wards, or included the Cannon Hill ward in the Mitcham and Morden constituency instead of Merton Park, as in our initial proposals, which had been previously opposed.
535. We received very few comments on our proposals for the Borough of Sutton. Those we did receive supported our revised proposals for constituencies of Carshalton and Wallington, and Sutton and Cheam. We received a few responses in opposition to our revised proposals in the Borough of Wandsworth, some continuing the request to use the new ward boundaries, and one to avoid the potential creation of a polling district for a single elector at the northern tip of the Earlsfield ward, but we received no detailed counter proposals departing from our revised proposals for constituencies of Battersea, Putney and Tooting.

### **Final recommendations**

536. As both our initial and revised proposals as to which wards from the Borough of Kingston upon Thames should be included in a Wimbledon-based constituency were heavily opposed, we decided to visit both the Old Malden and Coombe areas, to assess for ourselves the physical divides between them and the Borough of Merton. We travelled from Motspur Park station into St. James ward along West Barnes Lane and Motspur Park. We observed that the local authority boundary between the boroughs of Merton and Kingston upon Thames appears to be indistinct at this point and that the community of Motspur Park spans both sides of the boundary, with the station and other amenities in West Barnes ward in the Borough of Merton, while the park itself and Motspur Park road is in St. James ward, in the Borough of Kingston upon Thames. We continued along Malden Road through New Malden in order to observe the boundary between the St. James ward and the Beverley ward, noting that New Malden's shopping area begins in Beverley ward. We considered that residents of the St. James ward, at least those north of the A3 road, might look to New Malden for local amenities, but that the shopping area itself did not cross the boundary between the St. James and Beverley wards. However, we observed that the Beverley ward was highly integrated with the Coombe Vale ward, at least in the area south of Clarence Avenue/Langley Grove. Reaching the Coombe Hill ward, we observed Coombe Lane and proceeded to Wimbledon on the A238 Coombe Lane. We crossed the A3 road and considered that it was a significant barrier, with six lanes of fast-moving traffic and no obvious pedestrian alternative. Our conclusion after considering our observations alongside the evidence received across three public consultations, was that the Old Malden and St. James wards were the most appropriate to include in a Wimbledon constituency. We considered these wards have

the best physical links among the options explored, and that this pattern would also allow us to keep the Grove ward with the Norbiton ward, and the wider Surbiton community.

537. Given the strong evidence received across all our public consultations that both the Cannon Hill and Merton Park wards should be included in a Wimbledon-based constituency rather than a Mitcham and Morden constituency, we again investigated the various counter proposals submitted.
538. We noted that the counter proposal to include both wards in the Wimbledon constituency required the transfer of the Wandle ward to the Mitcham and Morden constituency. We considered this configuration would separate that community, as most residents of the Wandle ward live on the west bank of the River Wandle, and the part which lies in the east side of the river only has one road link, which is back across the river towards Wimbledon. We also investigated the possibility of splitting either or both of the Cannon Hill or Merton Park wards, but considered that, as this would provide no wider sub-regional benefit, it did not meet our threshold for dividing a ward.
539. We therefore considered that the only options available to us were the configurations of the initial proposals and revised proposals. We decided to visit both wards in order to see for ourselves their links with Morden and Wimbledon. We observed the John Innes conservation area in the northern part of the Merton Park ward and we also noted the proximity of much of the ward to Morden. We considered that most of the ward was geographically closer to Morden town centre than to Wimbledon town centre. On visiting the Cannon Hill ward, we noted that the main roads across the ward, Martin Way and Hillcross Avenue, both lead to Morden town centre. We considered that the two wards have ties to both Wimbledon and Morden but, in having to determine a pattern of constituencies that are all within the permitted electorate range, we considered that the links of the Cannon Hill ward to the Mitcham and Morden constituency were better. We propose as part of our final recommendations that the Cannon Hill ward be included in the Mitcham and Morden constituency, and that Merton Park be included in the Wimbledon constituency.
540. We considered again whether it would be appropriate to use new ward boundaries for the Borough of Wandsworth in order to devise a more future-proofed configuration of constituencies but, given the high levels of support for our proposals at the earlier two consultation stages, we concluded that this would not justify our departing from the December 2020 boundaries. We also considered the potential difficulties in creating a small polling district and concluded that this would be entirely manageable within the local authority election team. We therefore propose no further change here.
541. Our final recommendations in this sub-region are therefore for constituencies of: Battersea; Carshalton and Wallington; Kingston and Surbiton; Mitcham and Morden; Putney; Richmond Park; Sutton and Cheam; Tooting; and Wimbledon. These constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.

## **South Central London**

### **Initial proposals**

542. As outlined previously, our initial proposals treated South Central and South West London as one sub-region. This section of the report focuses on the South Central area, covering the boroughs

of Croydon, Lambeth, Lewisham, and Southwark, which includes ten existing constituencies and most of the existing Lewisham West and Penge constituency. Of the existing constituencies, the following fell above the permitted electoral range: Bermondsey and Old Southwark; Camberwell and Peckham; Croydon Central; Croydon North; Croydon South; Dulwich and West Norwood; Lewisham; Deptford; and Streatham. Lewisham East, and Lewisham West and Penge had electorates within the permitted range, and Vauxhall was above the permitted range.

543. In the Borough of Croydon we proposed constituencies of Croydon East and Croydon South which were entirely within the borough, a Croydon North constituency which included the orphan ward of Longthornton from the Borough of Merton, and a Norwood constituency which included two wards that make up the West Norwood area from the Borough of Lambeth. As part of our initial proposals, we proposed to split the Borough of Croydon ward of Waddon between constituencies.
544. We proposed constituencies of Clapham and Brixton, and Streatham within the Borough of Lambeth, and a Vauxhall and Camberwell constituency which included three wards from the Borough of Southwark. In the Borough of Southwark we proposed constituencies of Bermondsey and Borough, and Peckham, similar to the existing constituencies of Bermondsey and Old Southwark, and Camberwell and Peckham, and a Dulwich and Sydenham constituency which had four wards each from the boroughs of Lewisham and Southwark. We proposed constituencies of Deptford, and Lewisham East in the Borough of Lewisham, changed from the existing in order to take account of new local government ward boundaries.

### **Consultation on the initial proposals**

545. Our initial proposals for the Borough of Croydon were received with a mixture of support and opposition. Our proposed Croydon South constituency was widely supported, with respondents noting that our initial proposals kept together the communities of Purley, Coulsdon, Kenley, Sanderstead, Croham, and South Croydon, which are of a similar character and well connected by key transport arteries such as the A23 road and Southern rail routes. Very little concern was expressed over our proposed split of the Waddon ward.
546. We did, however, receive opposition from the Woodside and Addiscombe community regarding our proposed inclusion of the Woodside ward in the Norwood constituency rather than the Croydon East constituency with its Addiscombe neighbours. Respondents argued that the Woodside and Addiscombe areas had been in the same constituency for over 60 years, and that Woodside residents look south to Addiscombe for shopping, health and community services, and had transport links towards central Croydon. Including Woodside in a different constituency to Addiscombe would therefore break long-standing local ties. Respondents also highlighted that the Brighton Main Line represented a physical barrier between the Woodside ward and the rest of the proposed Norwood constituency to its north, which would particularly isolate the residents of Towpath Way and Canal Walk in the south-western corner of the ward. We received a petition expressing concern that Davidson Road, lying parallel to Towpath Way and Canal Walk, would be divided between two constituencies under our initial proposals.
547. However, some respondents argued that the Woodside ward shares local ties with the South Norwood area to its north, pointing out that the South Norwood leisure centre, country park, social club and mosque are all located in Woodside ward. They contended that the Brighton Main Line is permeable around South Norwood town centre – and noted that South Norwood ward in

fact spans the railway line to the north of Norwood Junction station, whereas the tram line running along the southern edge of the Woodside ward presents a hard boundary. Several representations highlighted that Croydon Council's Local Plan had designated South Norwood and Woodside as one place, with Addiscombe as another distinct place. One counter proposal included the Woodside ward in a Croydon North East and Penge constituency, which would cross the borough boundary with the Borough of Bromley.

548. We received another counter proposal in which the Woodside ward would remain together with Addiscombe in the Croydon East constituency, and consequently the Selsdon Vale & Forestdale ward would be transferred to the Croydon South constituency. This counter proposal would not require Waddon ward to be split. A similar arrangement for Croydon East and Croydon South constituencies was presented in another counter proposal which included splitting the South Croydon ward in order to bring the Croydon North constituency into the permitted electorate range.
549. In the boroughs of Lambeth and Southwark, we received over 400 representations opposing the division of the existing Dulwich and West Norwood constituency into four different constituencies. Respondents argued that, although spanning the two boroughs of Lambeth and Southwark, the existing constituency unites communities such as Herne Hill, Gipsy Hill, and West Dulwich, which are divided by the borough boundary. Our initial proposals would therefore break community ties in these areas, particularly in Herne Hill, which would be divided into three constituencies, and also in West Norwood, whose town centre and high street would be divided into two constituencies.
550. Other arguments in opposition contended that our initial proposals would pair boroughs lacking any community, geographical, or administrative connections. Respondents pointed out that West Norwood, proposed to be joined with wards from Croydon in the Norwood constituency, is geographically separated from Croydon by the Norwood Ridge. Similarly, the Dulwich area, proposed to be joined with wards from Lewisham in the Dulwich and Sydenham constituency, is divided from Lewisham by the Sydenham Hill Ridge and Dulwich Woods.
551. One counter proposal addressed many of these concerns by presenting a Dulwich and West Norwood constituency based on the existing constituency, which would include the following communities together in the same constituency: Herne Hill; Dulwich; Dulwich Village; Gipsy Hill; West Dulwich; and West Norwood. This was well supported in representations. Another proposed a similar Dulwich West constituency, but included the Borough of Lambeth ward of Tulse Hill in place of the Champion Hill ward from the Borough of Southwark, and split Knight's Hill ward from the Borough of Lambeth between the proposed Dulwich West, and Norwood and Streatham constituencies. Another suggested configuration, rather than crossing the boundary between the boroughs of Lambeth and Southwark, proposed a Norwood constituency that would consist of the Borough of Lambeth wards of the existing Dulwich and West Norwood constituency (plus two additional Borough of Lambeth wards), and a Dulwich and Sydenham constituency similar to our initial proposals. Others took a similar approach to this in the Borough of Lambeth and paired Dulwich with Camberwell in a constituency that would be wholly within the Borough of Southwark. Others supported our initial proposals for the Dulwich and Sydenham constituency, and separated the Borough of Lambeth wards currently in the Dulwich and West Norwood constituency into two different constituencies: Norwood, and Brixton East and Camberwell.

552. We received representations from two campaigns relating to the proposals for the Borough of Lambeth as a whole. One campaign opposed our initial proposals here for being unnecessarily disruptive and breaking local ties in the West Norwood area in particular. The campaign also noted that transport links primarily run north–south in the borough, whereas our initially proposed Clapham and Brixton constituency and Streatham constituency extended from the eastern to the western boundaries of the borough, with poor internal transport connections. This campaign supported the counter proposal as described above which proposed three constituencies that would be wholly contained within the Borough of Lambeth, two of which (Streatham and Vauxhall) would be very similar to the existing constituencies. Conversely, there were representations supporting our initial proposals for the Streatham constituency and opposing any counter proposals that would remove the Tulse Hill or Brixton Hill wards from the Streatham constituency, on the grounds that these counter proposals would break local ties.
553. Several respondents from the Borough of Lambeth expressed concern that our initial proposals did not take into account their new local government ward boundaries. The Order for new wards in the Borough of Lambeth was made in January 2022 – well after the statutory cut-off date.
554. A number of themes emerged regarding our initial proposals for the Vauxhall and Camberwell constituency, which would span the northern part of the boundary between the boroughs of Lambeth and Southwark. Opposition was expressed by some residents of the St. George’s ward in the Borough of Southwark that they would be separated from their neighbouring areas of Elephant and Castle, and Borough. Most representations also noted the developments and regeneration taking place around Elephant and Castle, arguing that the related issues would be best served by one MP.
555. Camberwell residents voiced strong opposition to the prospective division of the Camberwell area between constituencies. Respondents outlined strong community ties, shared local services, and a shared sense of identity between the two wards of Camberwell Green and St. Giles. A number of respondents also opposed the Camberwell Green ward being linked with the Vauxhall area, arguing that Camberwell as a whole has much stronger links with Peckham than with Vauxhall.
556. Several counter proposals sought to retain the two Camberwell wards together in a single constituency and include the St. George’s ward from the Borough of Lambeth in a Bermondsey-based constituency. A different suggestion proposed a Vauxhall and Camberwell constituency identical to our initial proposals except for the transfer of the St. George’s ward to a Bermondsey-based constituency.
557. One representation supported the inclusion of the two Borough of Southwark wards of Camberwell Green and Newington in a Vauxhall constituency, highlighting that Newington ward contains Kennington Underground station, and many residents of the existing Vauxhall constituency (especially in the Borough of Lambeth ward of Prince’s) use this station regularly. This response also argued that the inclusion of the Newington ward from the Borough of Southwark would bring together the entirety of Kennington Park and its surrounding housing estates, and further outlined school links between the Camberwell Green ward and its neighbouring Lambeth wards, as well as the uniting thread of Camberwell New Road, which is used as a shopping district by residents of Camberwell Green ward and the two Borough of Lambeth wards of Newington and Vassall. This, and a number of other responses proposed, however, that the existing constituency name of Vauxhall should be retained, since the

Camberwell part of the constituency would not be significantly larger than any of the other communities currently within the Vauxhall constituency.

558. The composition of our initially proposed Bermondsey and Borough constituency was generally well supported, but we received some opposition to the proposed name. Respondents either argued for the retention of the existing name (Bermondsey and Old Southwark), or advocated for the inclusion of Rotherhithe in the name of the constituency, contending that Rotherhithe is an important (and growing) population centre with its own distinct identity.
559. Our initial proposals for the Lewisham East constituency and the Deptford constituency did not generate much comment, since they would be unchanged from the existing constituencies except for realignment with new local government ward boundaries. Some respondents expressed opposition to a counter proposal for the Borough of Lewisham, particularly noting it would be divided into five constituencies, only one of which would be contained wholly within the borough boundary. Respondents highlighted that this counter proposal would break local ties between Lee Green and Hither Green in the east of the borough, and also contended that the Lee Green and Grove Park wards, which would be included in the counter proposal's Eltham and Blackheath constituency, have no ties to Eltham despite their proximity.
560. A different counter proposal for the Borough of Lewisham, however, was supported. Although it would represent more change from the existing constituencies than our initial proposals, respondents generally supported the proposed transfer of the Bellingham ward to the Lewisham East constituency, and the Blackheath ward to the Deptford-based constituency. It would also unite Beckenham Place Park in one constituency, and better reflect community ties. It was argued that the Blackheath population had become more oriented towards central Lewisham and the boundary between the areas is blurred, therefore it would make sense to include the Blackheath ward in a constituency with the Lewisham Central ward.
561. Others were critical of counter proposals which would divide both the Brixton and Streatham communities between multiple constituencies.

### **Revised proposals**

562. When considering potential revisions to our initial proposals in the boroughs of Croydon, Lambeth, Lewisham, and Southwark, our Assistant Commissioners recognised that the approach they decided to pursue for Croydon and Lambeth would ultimately dictate their choices for Southwark and Lewisham. They noted that counter proposals were not as easily interchangeable as they were in parts of North London, since the counter proposals tended to present significantly different solutions.
563. In assessing the options for the boroughs of Croydon and Lambeth, the Assistant Commissioners observed that those counter proposals that suggested configuring the Borough of Lambeth with coterminous constituencies all consequently proposed a constituency including wards from the boroughs of Croydon and Bromley in the Crystal Palace area. However, those counter proposals did not treat the Borough of Lambeth as a self-contained area with all proposed constituencies crossing between the boroughs of Lambeth and Southwark, or the boroughs of Lambeth and Croydon.



564. Our Assistant Commissioners saw the merit in the counter proposals to treat the Borough of Lambeth as self-contained, with three whole constituencies aligned to the borough boundaries. They noted that some of those proposals would also closely reflect the boundaries of the existing Vauxhall and Streatham constituencies. They considered that this arrangement for Lambeth would therefore strongly reflect the statutory factors within that borough. They also considered, however, that this would have significant knock-on consequences for the Borough of Southwark, such as dividing the Peckham community, and that the Borough of Lewisham would be divided into five different constituencies. Our Assistant Commissioners noted that the Borough of Lewisham ward of Bellingham would become an orphan ward in a Beckenham and Bromley Town constituency. The Assistant Commissioners were persuaded that Bellingham's links were overwhelmingly with Lewisham rather than with Beckenham or Bromley. Taken together, this evidence convinced our Assistant Commissioners to recommend keeping the sub-regions as initially proposed.
565. When assessing other counter proposals for the boroughs of Lambeth, Southwark, and Lewisham, our Assistant Commissioners considered that the proposal to retain a Dulwich and West Norwood constituency had merit, given the persuasive evidence received. While noting that the proposed arrangement for a Dulwich and West Norwood constituency would necessitate some significant change to the existing Vauxhall and Streatham constituencies, the Assistant Commissioners considered that it would enable a pattern of constituencies in the rest of Southwark and Lewisham more similar to the existing arrangement than other counter proposals. The Borough of Lewisham would be divided into only three constituencies under this counter proposal, closely reflecting the existing pattern. While the Borough of Southwark would be divided into five constituencies under this counter proposal, two would be wholly contained within the borough, and the Assistant Commissioners considered that the proposed Bermondsey and Borough constituency, Peckham constituency, and Dulwich and West Norwood constituency would all be clearly related to the pattern of existing constituencies.
566. The Assistant Commissioners further considered that this counter proposal's configuration of the Lewisham West and East Dulwich constituency would unite the Forest Hill and Honor Oak communities in the same constituency, although acknowledging that East Dulwich would be separated from Dulwich Village.
567. Our Assistant Commissioners observed that the Brixton area is currently divided into three constituencies, and that this counter proposal accordingly appeared, to them, to represent an improvement for Brixton compared with both the existing pattern and our initially proposed Clapham and Brixton constituency. They also considered that other counter proposals would continue to divide the Brixton community.
568. The Assistant Commissioners observed that this counter proposal's configuration of the Streatham and Thornton Heath constituency comprised the four core Streatham wards, and therefore would not divide the Streatham community. However, they recognised that we had received very few representations from the Norbury area, and so considered that they were not in a position to make an informed judgement about local ties of the Norbury community.
569. Turning their attention further south in the Borough of Croydon, the Assistant Commissioners saw the benefits of including the Woodside and Addiscombe wards together in the same constituency, given the strength of the representations outlining community ties between Woodside and Addiscombe, and the significant barrier of the Southern Main Line railway. They noted that

counter proposals to keep the Woodside and Addiscombe wards together in a Croydon East constituency included the consequential transfer of the Selsdon Vale & Forestdale ward to the Croydon South constituency, which would divide the town of Selsdon into two constituencies and break local ties in the Selsdon community.

570. While favouring this counter proposal, on the whole, above the other counter proposals received for the South Central London area, the Assistant Commissioners did recognise some of its potential drawbacks, including the division of Selsdon, the Thornton ward split, and the separation of the two Norbury wards. They identified, however, that it was possible to amend the counter proposal to address these issues: the Waddon ward in the Borough of Croydon could be split instead of the Thornton ward in the Borough of Lambeth (by transferring two polling districts, WDN5 and WDN6, to the Croydon South constituency, rather than just WDN6 as in our initial proposals); the Norbury & Pollards Hill ward could then be transferred from the Croydon North constituency to a Streatham and Thornton Heath constituency, to bring the two Norbury wards together in the same constituency; and consequently the Woodside ward could be transferred from the Croydon East constituency to the Croydon North constituency, to enable both Selsdon wards to remain together in the Croydon East constituency. The Assistant Commissioners recognised that this plan would separate Woodside from Addiscombe, but they noted the evidence we had received in support of Woodside being linked with the South Norwood ward to its north. To help them understand the practical implications of this revised version of the counter proposal, our Assistant Commissioners visited the area.
571. On visiting the Waddon ward, our Assistant Commissioners were not convinced that dividing the ward along the western boundary of the WDN5 polling district would present a desirable solution. They considered that the resultant constituency boundary would run through residential streets and divide a homogeneous neighbourhood. The Assistant Commissioners then visited the Norbury & Pollards Hill, and Norbury Park wards, observing a strong sense of the Norbury community identity. They considered that the railway line was not a significant barrier between these two wards, since the road continued directly under the railway line and the houses on either side of the railway were similar in appearance. The Assistant Commissioners therefore considered that the two Norbury wards were strongly linked, and that including them together in the same constituency would represent an improvement on the counter proposal discussed above.
572. Crossing the borough boundary from the Norbury area to the Streatham area, our Assistant Commissioners considered that these areas merged together with little discernible difference between the Norbury Park and Streatham South wards. In contrast, along Crown Lane (the A214, which is also the borough boundary between Croydon and Lambeth in the Upper Norwood/ West Norwood area) they observed that the summit of the Norwood Ridge marked a notable topographical boundary between the West Norwood area and Croydon, as representations had outlined. Therefore, they considered that a cross-borough constituency between Norbury and Streatham made more sense 'on the ground' and better reflected the statutory factors.
573. When visiting the Woodside ward, our Assistant Commissioners considered that the railway lines did, on the whole, present a significant physical barrier between the Woodside ward and South Norwood ward to its north. They considered that the railway line was not such a strong divide around Norwood Junction station, since South Norwood Hill merged into Portland Road here and there continued to be shops and services on either side of Portland Road south-east of the railway. However, to the south of Norwood Junction the railway line was a much more

significant barrier, with a single road bridge over it and, on visiting Canal Walk and Towpath Way, our Assistant Commissioners sympathised with residents' concerns that this road and the surrounding area would be extremely isolated if included in a constituency with wards to its north rather than to its south.

574. Following their site visits, the Assistant Commissioners explored further options for the Waddon and Woodside areas. They alighted upon a solution that would enable the whole of the Waddon ward to remain in a single constituency, and that would enable most of the Woodside ward to remain in a constituency with its southerly Addiscombe neighbours – while not dividing the town of Selsdon as a consequence. This solution involved adding the Park Hill & Whitgift ward to the Croydon South constituency, and splitting the Woodside ward by including all its polling districts except WDS1 in the Croydon East constituency. WDS1 would be included in a constituency with the South Norwood ward to its north. Our Assistant Commissioners considered that the WDS1 polling district, in the north-eastern corner of the ward, was the one part of Woodside that could be said to link seamlessly with the South Norwood ward – which traverses the railway line in this area – to the extent that residents of this part of the ward would likely identify more with the South Norwood community than the Woodside community. Regarding the Park Hill & Whitgift ward, they considered that much of the residential area of the ward was an extension of the South Croydon neighbourhood, and therefore made a logical addition to the Croydon South constituency.
575. In light of their assessments, and mindful of the careful balancing of a number of issues, our Assistant Commissioners recommended the adoption of an amended version of this counter proposal for the Borough of Croydon and part of the Borough of Lambeth, as outlined in the solution above. Given the reconfiguration proposed, they also recommended that the names Croydon East and Croydon South should be retained.
576. In the Borough of Lambeth, the Assistant Commissioners recommended a Lambeth Central constituency closely aligned with the counter proposal's Clapham and Brixton constituency, but including the whole of the Thornton ward. Since the constituency would not encompass all of the Brixton community, our Assistant Commissioners considered that Lambeth Central would be a more appropriate name. They acknowledged those representations encouraging us to take account of the Borough of Lambeth's new local government ward boundaries, but they considered that using post-December 2020 ward boundaries across the borough was not necessary given they were not persuaded to split any wards.
577. The Assistant Commissioners subsequently recommended the adoption of a counter proposal for the rest of the boroughs of Lambeth, Southwark, and Lewisham – namely, the following constituencies of: Dulwich and West Norwood; Vauxhall and Camberwell; Bermondsey and Borough; Peckham; Lewisham West and East Dulwich; Lewisham East; and Lewisham North and Deptford. They recommended, however, that the Vauxhall and Camberwell constituency should simply be named Vauxhall, in light of the arguments presented for the retention of this name. They also recommended that the Bermondsey and Borough constituency should be named Bermondsey and Old Southwark, maintaining its existing name. They considered that this would be in greater accord with our policy on naming than would the inclusion of Rotherhithe in the name, since the shape and character of the revised constituency would reflect that of the existing constituency. While acknowledging that this configuration would maintain the division of the Camberwell community – an issue that had generated notable opposition in the consultation periods – the Assistant Commissioners considered that no other counter proposal

would better reflect the statutory factors across the sub-region as a whole. We agreed with their recommendations.

### **Consultation on the revised proposals**

578. Our revised proposals across the Borough of Croydon were both supported and opposed. Residents of the Park Hill & Whitgift ward considered that their ties lay to the north, citing transport links across the ward into the two Addiscombe wards to support their request that they should not be included in the Croydon South constituency. Representations regarding the Woodside ward were mixed, with some supporting our split of the ward, with the southern part of the ward being linked with the two Addiscombe ward in our proposed Croydon East constituency. However, others opposed the split, arguing that this would divide a close-knit community, and that the entire ward should be included in the Croydon East constituency. Still others considered that the entire ward belongs with the South Norwood ward rather than with the Addiscombe East and Addiscombe West wards.
579. We received several counter proposals to attempt to resolve these issues in different ways. One included the Park Hill & Whitgift ward in a Croydon East constituency, the Woodside ward in a Croydon West and South Norwood constituency, and split the Waddon ward at the A232 Duppas Hill Road between the two to bring both within the permitted electorate range. Another kept the wards of Addiscombe East, Addiscombe West, Park Hill & Whitgift, and Woodside together in a Croydon North East constituency with the South and Upper Norwood areas, but created an elongated Croydon West and Purley constituency in order to achieve this. One counter proposal kept the Park Hill & Whitgift ward in the Croydon South constituency as we proposed, but included the two Addiscombe wards in a Croydon West configuration, and the Woodside ward in a Croydon East constituency reaching from South Norwood to New Addington. Another alternative suggested splitting the Waddon ward as we had in our initial proposals, and the Woodside ward in a different way to our revised proposals, linking more of it with the South Norwood ward. The final counter proposal received for this area split the Waddon ward along the A232 Duppas Hill Road as described above, and the Broad Green ward between a Croydon North constituency including the Addiscombe East, Addiscombe West, South Norwood and Woodside wards, and included the Park Hill & Whitgift ward in a Croydon Central constituency extending from the split Broad Green and Waddon wards to New Addington in the south of the borough.
580. Some of our proposed constituency names in the Borough of Croydon were opposed, with suggestions that the Croydon East constituency should be named Addington and Addiscombe, and that Croydon South should be named Coulsdon and Purley, but these attracted little support. There was some opposition to the name of our proposed Croydon West and South Norwood constituency, with the most popular alternative being Croydon West, with Croydon North, and Croydon and South Norwood also suggested. A small number of representations opposed our Streatham and Croydon North revised proposal for pairing parts of the Borough of Croydon with the Borough of Lambeth, but no viable counter proposals were provided at the final consultation stage to resolve this. It was suggested that the constituency might instead be called Streatham and Upper Norwood, Croydon North and Streatham, or Streatham and Croydon North.
581. The biggest issue across the boroughs of Lambeth and Southwark was the substantial opposition to the lack of any Camberwell-centred constituency and the consequent breaking of community ties, as both our initial and revised proposals divided this area between three constituencies.

Residents of the Champion Hill ward in the Borough of Southwark drew particular attention to our revised proposal to include them in the Dulwich and West Norwood constituency. They preferred our initial proposal for the ward to be included in the Peckham constituency, with which they considered they had strong ties, entirely within the Borough of Southwark, rather than the two-borough constituency of Dulwich and West Norwood where they considered their issues would be forgotten within the much larger areas of the majority of that constituency. The majority of representations received also objected to none of the proposed successor constituencies including Camberwell in their names. Suggested alternative names for our Peckham constituency included Peckham and Camberwell, Peckham and East Camberwell, and Camberwell, Peckham and Walworth. Alternatives for our proposed Vauxhall constituency included Camberwell and Vauxhall, Vauxhall and West Camberwell, and Waterloo.

582. Other than from the Champion Hill ward, our proposed Dulwich and West Norwood constituency was supported for resolving concerns raised at earlier stages of consultation by residents of: Dulwich; Gipsy Hill; Herne Hill; West Dulwich; and West Norwood. One respondent suggested that our Dulwich and West Norwood constituency should instead be named Dulwich and Brixton.
583. We received a small amount of opposition to our proposed Lewisham West and East Dulwich constituency as it was suggested it broke community ties between Dulwich and East Dulwich. We also received alternative proposals for the constituency name. There were suggestions that it should instead be named East Dulwich and Forest Hill, Forest Hill and East Dulwich, Sydenham and East Dulwich, or Lewisham West and Dulwich Hill.
584. Our revised Bermondsey and Old Southwark constituency elicited little response other than a proposal to change the name to Bermondsey and North Southwark. We received a counter proposal for five constituencies in the boroughs of Lambeth and Southwark, to be reconfigured as: Clapham and Brixton; Camberwell and Peckham; Dulwich and West Norwood; Lewisham West and Nunhead; and Vauxhall. It made the case that this would reunite Camberwell, avoid a division of Nunhead, keep East Dulwich together with Dulwich, unite all of Brixton, and unite Stockwell.
585. Apart from the previously mentioned Lewisham West and East Dulwich responses to our revised proposals for the Borough of Lewisham, other representations commented on constituency names. Alternatives received included that our proposed Lewisham East should instead be named Lewisham South East, that Lewisham North and Deptford should be named Lewisham Central and Deptford, Deptford, Lewisham North, or Lewisham Deptford, as it is currently.

### **Final recommendations**

586. As outlined above, we received further calls to consider the new local government ward boundaries in the Borough of Lambeth. However, we would only consider aligning with new ward boundaries in instances where we propose to split a ward. Therefore, we have decided not to modify the proposed constituency boundaries.
587. Given the opposition to our proposals for the Park Hill & Whitgift ward in the Borough of Croydon, we considered whether any of the counter proposals put forward might resolve these concerns. None of them appeared to us to resolve the issue without creating knock-on effects, such as the previously opposed separation of the Woodside ward from the Addiscombe area, or the pairing of Croydon town centre with the more distant Purley through what might be considered a

bottleneck. We found that none of the alternatives were demonstrably more in accordance with the statutory factors than our revised proposals. We considered that the evidence to change the configuration of our proposed Streatham and Norbury constituency was not extensive, and no credible alternatives were provided. We did, however, find that some of the suggested names were more representative of their borough identity, and so recommend that Croydon West and South Norwood should be named Croydon West, and that Streatham and Norbury should be named Streatham and Croydon North.

588. We found that the five-constituency counter proposal for the boroughs of Lambeth and Southwark had some merit, but did result in significant consequential modifications being required. Although it appeared that it might unite the Stockwell area, and the Brixton area within separate constituencies, our Lambeth Central proposal was not opposed in these areas. Although the counter proposal included most of the East Dulwich area in its Dulwich and West Norwood configuration, it excluded the Borough of Southwark ward of Dulwich Hill, into which that area extends. We also considered that it divided the centre of the Peckham area by including the Borough of Southwark wards of Nunhead & Queen’s Road, and Rye Lane in different constituencies. The Newington ward from the Borough of Southwark would also be an orphan ward in a Vauxhall constituency otherwise made up of Borough of Lambeth wards. While this configuration would provide for a constituency including Camberwell, we considered that the counter proposal was likely to break community ties in a number of areas. However, we do propose to rename the Lambeth Central constituency as Clapham and Brixton Hill, as we consider this constituency better reflects the areas comprising the constituency. Similarly, we noted that a number of representations commented on Camberwell no longer being included in a constituency name. We considered that, as the proposed Vauxhall constituency includes the Camberwell Green area, this constituency should be named Vauxhall and Camberwell Green.
589. Given the lack of any substantive opposition to our proposals for the rest of the Borough of Lewisham, we recommend no change to the configurations of constituencies here. However, we are minded to rename the two constituencies entirely within the borough as Lewisham East and Lewisham North. We consider these constituency names better reflect the areas comprising the constituencies.
590. Our final recommendations in this sub-region are therefore for constituencies of: Bermondsey and Old Southwark; Clapham and Brixton Hill; Croydon East; Croydon South; Croydon West; Dulwich and West Norwood; Lewisham East; Lewisham North; Lewisham West and East Dulwich; Peckham; Streatham and Croydon North; and Vauxhall and Camberwell Green. These constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.

## South East London

### Initial proposals

591. Of the nine existing constituencies in the South East London sub-region, the constituency of Lewisham West and Penge, which includes wards from the Borough of Lewisham, had an electorate within the permitted range. Seven constituencies – Beckenham; Bexleyheath and Crayford; Bromley and Chislehurst; Eltham; Erith and Thamesmead; Old Bexley and Sidcup, and

Orpington – are currently beneath the permitted range, while the constituency of Greenwich and Woolwich fell above the permitted range.

592. In the Borough of Greenwich, we proposed a Greenwich and Woolwich constituency that would be changed from the existing constituency only by the transfer of the Glyndon ward to the Erith and Thamesmead constituency. Spanning the boroughs of Greenwich and Bexley, our proposed Erith and Thamesmead constituency was based on the existing constituency, but also included the Shooters Hill ward from the existing Eltham constituency. We proposed two constituencies that would be wholly within the Borough of Bexley: Bexleyheath and Crayford, and Sidcup and Welling. These largely follow the existing arrangement in the borough, albeit with boundaries realigned to new local government ward boundaries.
593. In the Borough of Bromley, we proposed three constituencies that would be wholly contained within the borough boundaries: Beckenham, Bromley, and Orpington. Given the borough's mathematical entitlement to 3.24 constituencies, one additional constituency has to cross the boundary with a neighbouring borough. We proposed an Eltham and Chislehurst constituency that would span the boundary between the boroughs of Bromley and Greenwich, noting the continuous residential development and numerous road links across that boundary.

### **Consultation on the initial proposals**

594. In the Borough of Greenwich, our initial proposals for the Greenwich and Woolwich constituency were strongly supported. Respondents acknowledged that the existing constituency was above the permitted electorate range, and they supported the proposed transfer of the Glyndon ward to the Erith and Thamesmead constituency. Many respondents considered that our initial proposals would maintain the integrity of the Greenwich, Woolwich, and Charlton communities, and they provided much detailed evidence of strong and long-standing community ties between these areas.
595. Additionally, many respondents specifically expressed opposition to counter proposals that would divide the Greenwich and/or Woolwich communities. Particularly strong opposition was voiced to counter proposals which would involve splitting at least one ward in the Woolwich area. Under one counter proposal, the Woolwich Riverside ward would be divided between a Greenwich and Deptford constituency, and an Erith and Thamesmead constituency, while the Woolwich Common ward would be included in an Eltham constituency. Under another counter proposal, both Woolwich Riverside and Woolwich Common wards would be divided between constituencies. Both of these counter proposals would result in the Woolwich area as a whole being divided into three constituencies.
596. Some respondents put forward counter proposals for constituencies crossing the northernmost part of the Greenwich-Lewisham borough boundary, thereby pairing parts of the Greenwich and Deptford areas. In opposition to this approach, respondents pointed out the geographical 'barrier' of the Deptford Creek and River Ravensbourne dividing Greenwich from Lewisham, as well as the open space of Blackheath and the A2 road.
597. We received a number of representations from residents of the Kidbrooke with Hornfair ward, arguing that the Hornfair part of the ward (polling districts KH1 and KH2, north of Shooters Hill Road) is part of the Charlton community and should be included in the Greenwich and Woolwich constituency – with the rest of Charlton – rather than an Eltham-based constituency (as in both

the current arrangement and our initial proposals). Residents argued that they identify with Greenwich and use facilities in the Greenwich area, rather than in Eltham. Some respondents also noted that, under Greenwich's new ward boundaries, the Hornfair area is included in the new Charlton Hornfair ward, with its boundary aligned to Shooters Hill Road. The Order for new wards in Greenwich was made in December 2021 – well after the statutory cut-off date.

598. Our initially proposed Erith and Thamesmead constituency, which would span the boundary of Greenwich and Bexley (as in the current arrangement), received a mixed response. There was general support for the communities of Abbey Wood, Belvedere, Erith, and Thamesmead remaining together in the same constituency. Our proposed addition of the Glyndon and Shooters Hill wards was welcomed by residents of Plumstead: the Plumstead community is currently divided between three constituencies, and residents welcomed that our initial proposals would unite Plumstead in a single constituency.
599. It was noted, however, that Plumstead extends only partially into Shooters Hill ward, and the remainder of the ward identifies separately as a distinct Shooters Hill community. It is therefore 'a ward of two halves'. Residents of the Shooters Hill part of the ward were strongly opposed to potentially being transferred from the Eltham constituency to the Erith and Thamesmead constituency. They argued that Shooters Hill has strong historic links with Eltham – and Woolwich – but minimal connection with Erith or Thamesmead. We also received a campaign from Shooters Hill residents opposing their proposed removal from the Eltham constituency.
600. Recognising that Shooters Hill ward contains two distinct communities, some respondents said that we should consider using Greenwich's new ward boundaries, which separate Plumstead and Shooters Hill into different wards.
601. In response to comments from the residents of Shooters Hill and Plumstead, and comments from the residents of Hornfair, one counter proposal split both the Shooters Hill, and Kidbrooke with Hornfair wards using existing polling districts. Polling districts SH1, SH2, and SH3 from Shooters Hill ward (which cover the Shooters Hill community) would be included in the Eltham-based constituency, while polling districts SH4, SH5, SH6, and SH7 (largely covering the Plumstead part of the ward) would remain with the Erith and Thamesmead constituency. Polling districts KH1 and KH2 from Kidbrooke with Hornfair ward (covering the Hornfair area) would be included in the Greenwich and Woolwich constituency, while polling districts KH3, KH4, KH5, and KH6 would remain in the Eltham-based constituency. It was argued that splitting the wards in this way would address residents' concerns about community ties, and would mean the constituency boundaries would align more closely – although not exactly – with the Borough of Greenwich's new ward boundaries.
602. Our initial proposals for two constituencies wholly contained within the Borough of Bexley – Bexleyheath and Crayford, and Sidcup and Welling – were well supported, since the proposed constituencies would be mostly unchanged from the existing arrangement except for realignment with new ward boundaries in the borough (which were implemented in 2018) and the addition of the Northumberland Heath ward to the Bexleyheath and Crayford constituency. Respondents noted that these minor adjustments would enable the whole of the Bexleyheath community, which extends into the West Heath and Northumberland Heath areas, to be united in a single constituency, and the whole of Welling would be united in a single constituency. There was opposition, however, to the proposed name Sidcup and Welling: respondents argued that Old



Bexley should be preserved in the name of the constituency due to its historical significance. They suggested retaining the existing name, or changing the name to Old Bexley, Sidcup and Welling.

603. We received a counter proposal which supported our initial proposal for the Greenwich and Woolwich constituency, but provided a counter proposal for the remainder of the boroughs of Greenwich and Bexley. This counter proposal would retain the Shooters Hill ward in an Eltham constituency, resulting in consequential changes to the Bexley constituencies: the two Welling wards would be included in different constituencies, and the Chislehurst ward from the Borough of Bromley would be included as an orphan ward in a Sidcup and Chislehurst constituency. It noted the good road connections across the A20 road between the two areas, and their similar characters. Others opposed this view, considering the A20 to be a significant barrier, and that the separation of the two Welling wards would break community ties in Welling. The counter proposal also transferred the Slade Green & Northend ward from the Bexleyheath and Crayford constituency to the Erith and Thamesmead constituency; this was opposed by those who argued that the ward's ties are primarily south to Crayford rather than west to Erith.
604. Other counter proposals, similar to that described above, sought to retain the Shooters Hill ward in an Eltham constituency, but would then involve significant changes to the existing constituencies in the Greenwich and Woolwich areas and across the Borough of Bexley. Notably, these would adhere to the borough boundary between Greenwich and Bexley in the Thamesmead area (contrary to the existing constituency arrangement). This was opposed by those who considered that the boundary here is porous and indistinct, and that the Thamesmead community includes parts of both boroughs.
605. Our initial proposals for the Eltham and Chislehurst constituency would combine the Eltham area of the Borough of Greenwich with the Chislehurst area of the Borough of Bromley. We received over 300 representations opposing this proposed constituency, with most respondents arguing that Eltham and Chislehurst are two very different communities in different London boroughs, with limited community, social, or transport connections between the areas. The A20 road, running through the Coldharbour and New Eltham ward towards the south of the Borough of Greenwich, was referenced as a strong dividing line. Chislehurst residents said that they look to Bromley for social activities, shopping, community groups, and local services, so our initial proposals would break local ties between Chislehurst and Bromley.
606. There was considerable support (over 150 representations) for a counter proposal for a Chislehurst and Mottingham constituency, which was identical in configuration to another counter proposal's configuration of a Chislehurst and Bromley Common constituency. The counter proposal would join the Chislehurst area with other wards in the Borough of Bromley and one ward – Coldharbour and New Eltham – from the Borough of Greenwich. Respondents argued that the borough boundary between Bromley and Greenwich is indistinct and the A20 road (and, to a lesser extent, the Dartford Loop Line railway that acts as the northern boundary to Coldharbour and New Eltham ward) represents the actual dividing line between communities. Respondents from Mottingham highlighted that the Mottingham community spans the Bromley-Greenwich boundary, and that therefore this counter proposal would unite all of Mottingham in a single constituency. Conversely, a number of respondents argued that the counter proposal would divide the New Eltham community, which lies either side of the Dartford Loop Line, and thus either side of the proposed constituency boundary.

607. To accommodate their proposed Chislehurst and Mottingham or Chislehurst and Bromley Common constituency, the counter proposal included an Eltham and Blackheath constituency that would cross the borough boundary between Greenwich and Lewisham. It argued that there is a continuous urban area at the crossing point, and that the constituency would be connected internally by two railway lines. They also highlighted that the Eltham constituency already contains a part of Blackheath, so the proposal would unite more of the Blackheath community (which spans Greenwich and Lewisham boroughs) in one constituency. As previously noted, there was opposition to this proposal from respondents in the Borough of Lewisham.
608. In the Borough of Bromley, we received strong opposition to our initial proposals regarding the Petts Wood and Knoll ward, which would be transferred from the existing Orpington constituency to our proposed Bromley constituency. It was contended that our initial proposals would break community ties, since Petts Wood and Knoll ward has long-standing historical and administrative links with Orpington, and the ward boundary extends all the way to Orpington High Street. It was also argued that the ward is separated from Bromley by railway lines. There was notable support for the counter proposal discussed above in this area, which would keep Petts Wood and Knoll ward in the Orpington constituency, and split the neighbouring Cray Valley West ward between its proposed Orpington, and Chislehurst and Bromley Common constituencies. Some representations proposed splitting the Petts Wood and Knoll ward, so that at least the Knoll part of the ward (the southern portion of the ward extending from central Orpington to Crofton Lane) could remain in the Orpington constituency. Alternatively, other counter proposals suggested splitting the Darwin ward (situated further south in the Borough of Bromley) and transferring part of Darwin ward and the whole of the Biggin Hill ward from the Orpington constituency to the Bromley constituency, so that Petts Wood and Knoll ward could remain in the Orpington constituency.
609. We received few comments regarding the rest of our proposed Bromley constituency, but there was some support for our proposed inclusion of the Bickley ward, and the Plaistow and Sundridge ward in our Bromley constituency, given the wards' proximity to and ties with Bromley town centre. Some concern was expressed over the inclusion of Hayes and Coney Hall ward in our Bromley constituency; it was argued that the Coney Hall community looks to West Wickham – which was included in the Beckenham constituency in our initial proposals.
610. Our initially proposed Beckenham constituency, which would join together the Beckenham and Penge areas, was greeted with a mixed response. Some Penge residents outlined that they identify more closely with Lewisham or Crystal Palace and Upper Norwood in terms of culture, socio-economic status, and outlook. Conversely, others argued that Penge and Beckenham make a natural fit, and share many local services and recreational amenities, such as Crystal Palace park and The Spa at Beckenham. Respondents noted that our initial proposals would unite all of Beckenham town centre in a single constituency (part of Beckenham town centre lies in the Clock House ward, which is currently in the Lewisham West and Penge constituency). Others also supported the proposed inclusion of the Clock House ward in the Beckenham constituency. Some respondents pointed out that our initial proposals would reflect the pre-2010 Beckenham constituency. Many respondents argued that, if our initial proposals were to be adopted, Penge should be included in the constituency name, to recognise this sizeable and historic community. We also received some counter proposals which suggested constituencies linking parts of the boroughs of Bromley and Croydon in the Crystal Palace area.

611. As for central Bromley and Beckenham, we received a counter proposal for a Beckenham and Bromley Town constituency that would join the Bromley Town ward with the Beckenham area to its west and include the Bellingham ward from Lewisham. The proponent of this counter proposal considered that the Bromley Town ward, currently part of the Bromley and Chislehurst constituency, has links with the wards of Copers Cope and Shortlands to its west. Respondents welcomed the proposed inclusion of the Hayes and Coney Hall, and West Wickham wards in the same constituency under this counter proposal. Others were highly critical of this counter proposal for the Borough of Bromley as a whole, as every constituency would include parts of other boroughs, two would include orphan wards, another would include a split ward, and Bromley town centre would be separated from nearby residential areas that look to it for shopping and local services.

### **Revised proposals**

612. When considering whether to recommend any revisions to our initial proposals for the South East London sub-region, our Assistant Commissioners first noted the overwhelmingly positive response to our initial proposals for Bexley borough, and for the Greenwich and Woolwich constituency. They agreed with respondents from Greenwich and Woolwich that the counter proposals would break strong local ties across the Greenwich and Woolwich areas and, in some cases, result in significant disruption to other existing constituencies.
613. Regarding the Shooters Hill ward, our Assistant Commissioners acknowledged the differing views put forward by residents of Plumstead and Shooters Hill. They recognised that dividing the Shooters Hill ward along the new ward boundaries, as some respondents had suggested, would make sense in terms of community ties. They also acknowledged the representations from Hornfair residents and appreciated that they would gravitate more naturally towards Charlton and Greenwich than towards Eltham. Our Assistant Commissioners carefully considered the counter proposal to divide both the Shooters Hill, and Kidbrooke with Hornfair wards using existing polling districts. They observed that it was also possible to include the Shooters Hill part of Shooters Hill ward in the Greenwich and Woolwich constituency, rather than the Eltham-based constituency, noting that residents of Shooters Hill had cited ties with Woolwich as well as with Eltham. The Assistant Commissioners, however, ultimately considered that splitting these wards – whether using existing or new boundaries – would present very isolated benefits and therefore would not meet our criteria to justify ward splitting. They further considered that splitting the Kidbrooke with Hornfair ward would represent a greater change to existing constituency boundaries, since the whole ward is currently part of the Eltham constituency.
614. The Assistant Commissioners also assessed those counter proposals that would keep the whole of Shooters Hill ward in an Eltham-based constituency, as in the existing arrangement. They noted the counter proposal keeping the Greenwich and Woolwich constituency the same as in our initial proposals, but they considered that the resultant changes to the Bexley constituencies would break a number of local ties in the Borough of Bexley. They considered that other counter proposals would result in even more disruption to existing constituencies and local ties in the Borough of Bexley, as well as significant disruption to the existing Greenwich and Woolwich constituency. They agreed that, despite its being divided by a borough boundary, the community of Thamesmead should remain united in an Erith and Thamesmead constituency. The Assistant Commissioners observed that other counter proposals divided the Woolwich community, splitting at least one ward in Woolwich, and caused knock-on disruption elsewhere in South London.

615. On balance, our Assistant Commissioners were minded to recommend maintaining our initial proposals for the four constituencies of Bexleyheath and Crayford, Erith and Thamesmead, Greenwich and Woolwich, and Sidcup and Welling. While acknowledging that the Shooters Hill community would potentially be better placed in a constituency with Eltham (or Woolwich) rather than with Erith and Thamesmead, they considered that our proposal to include the Shooters Hill ward in the Erith and Thamesmead constituency would at least unite the Plumstead area – a move which had been well supported in representations.
616. Before settling their recommendations for the Borough of Bexley and the north of the Borough of Greenwich, our Assistant Commissioners considered the strong opposition to our initial proposals for the Eltham and Chislehurst constituency. They recognised the merits of counter proposals in joining the Chislehurst community with other parts of Bromley, and including the Eltham area in a separate constituency to Chislehurst, but noted that some of the main arguments put forward in support of this counter proposal also applied to our initial proposals. For example, many respondents supported one counter proposal on the grounds that it would unite the Mottingham community, which spans the Greenwich-Bromley boundary. Our Assistant Commissioners observed that our initial proposals would also unite the Mottingham community in the same way. We had also received many representations from residents of the streets south of the A20 in the south-eastern part of Coldharbour and New Eltham ward (such as Brownspring Drive and Domic Drive), supporting the counter proposal on the basis that they look to Chislehurst rather than Eltham for their local services; our Assistant Commissioners noted that our initial proposals would again address these residents' views, by joining the Coldharbour and New Eltham ward with both the Chislehurst ward and the Mottingham and Chislehurst North ward.
617. Understanding that the A20 is considered a hard boundary by many respondents living in the area, our Assistant Commissioners noted that the A20 does not align with the boundary of Coldharbour and New Eltham ward, but runs through the ward, with the Dartford Loop Line representing the actual ward boundary. No counter proposals had suggested splitting the Coldharbour and New Eltham ward to reflect the A20 as a hard geographic barrier. However, recognising that the community of New Eltham spans the railway line in the eastern parts of the Coldharbour and New Eltham ward and Eltham South ward, our Assistant Commissioners were persuaded by those representations expressing concern that counter proposals would divide the New Eltham community and break local ties in this area.
618. Furthermore, our Assistant Commissioners noted that the counter proposal would pair the core Eltham wards with three wards in Lewisham borough and, in light of the representations received from Lewisham, they considered that this approach would break local ties in the Lee Green and Hither Green areas and cause significant disruption to the existing constituency arrangement in Lewisham and Southwark. While accepting the argument that the counter proposed Eltham and Blackheath constituency would unite more of the Blackheath community in the same constituency, our Assistant Commissioners observed that the Blackheath Westcombe ward would still remain in the Greenwich and Woolwich constituency, and therefore the commercial centre of Blackheath and a significant portion of the surrounding residential area would still be divided across different constituencies. They therefore considered that the counter proposal's arrangement would not represent a significant improvement on our initial proposals for this area.

619. When assessing counter proposals for the Borough of Bromley, the Assistant Commissioners noted that other counter proposals would not traverse either the Bromley-Greenwich or the Bromley-Bexley borough boundary. These proposed a Bromley and Chislehurst constituency that would be wholly within the Borough of Bromley and similar to the existing Bromley and Chislehurst constituency. Other counter proposals would both join parts of the boroughs of Bromley and Bexley in their proposed Orpington and Sidcup constituency, but also proposed a Bromley and Chislehurst constituency that would be wholly within the Borough of Bromley. Our Assistant Commissioners considered, however, that all these counter proposals would cause significant consequential disruption elsewhere. They saw merit in a suggested Orpington constituency, in that it would retain the Petts Wood and Knoll ward, and also acknowledged the advantages of its proposed Beckenham and Bromley Town constituency in terms of keeping the Hayes and Coney Hall, and West Wickham wards together. Our Assistant Commissioners were, however, concerned by the proposed separation of the Bromley Town ward from its surrounding wards of Bickley, and Plaistow and Sundridge – and also Bromley Common and Keston – since these wards all have close ties to Bromley town centre.
620. In assessing the representations in response to our initial proposals for the three constituencies contained wholly within the Borough of Bromley, our Assistant Commissioners considered that the key issue generating wholesale opposition from respondents was the transfer of the Petts Wood and Knoll ward from the Orpington constituency to the Bromley constituency. They therefore sought to identify alternative patterns of constituencies that would enable the Petts Wood and Knoll ward to remain in the Orpington constituency. Their investigations indicated that this would not be possible without splitting at least one ward in the borough. A potential solution involved splitting the Farnborough and Crofton ward (currently in the Orpington constituency) between the Orpington and Bromley constituencies, and splitting the Shortlands ward (currently in the Beckenham constituency) between the Bromley and Beckenham constituencies – allowing Petts Wood and Knoll ward to remain wholly in the Orpington constituency. To help them assess the implications of these potential ward splits ‘on the ground’, and also to gain a better understanding of some of the issues in Chislehurst, and the Coldharbour and New Eltham ward, they visited the area.
621. Having visited the area, they considered that a split of the Darwin ward would enable the formulation of the pattern of constituencies that best reflected the statutory factors. Their investigations confirmed that it was possible to avoid splitting both the Shortlands ward and the Petts Wood and Knoll ward by splitting only the Darwin ward instead: this would involve transferring the DA1 polling district, and the whole of the Biggin Hill ward, from the Orpington to the Bromley constituency. Since the Darwin ward encompasses a largely rural area, the Assistant Commissioners considered that the split would be unlikely to divide an individual community, as was more likely in the built-up area. They also noted that the A233 – the main road running through Biggin Hill – continues northwards to Bromley and that therefore, although geographically distant, Biggin Hill could be seen as reasonably well connected to Bromley town. Due to the shape of the Biggin Hill ward, however, the Assistant Commissioners noted that transferring the ward to the Bromley constituency would divide part of the Biggin Hill community in the south-east of the town. A solution was identified in the Borough of Bromley’s new ward boundaries, since the new Biggin Hill ward unites those parts of the Biggin Hill community that were separated under the existing Biggin Hill ward. This solution would therefore involve splitting the existing Darwin ward in three ways: polling district DA1 would be included in the Bromley constituency, as would

those parts of polling districts DA5 and DA7 that lie in the new Biggin Hill ward. The remainder of Darwin ward would be included in the Orpington constituency. They considered that this solution had merit, in that it would require only one ward to be split (under both the existing and new boundaries), rather than two wards in other potential solutions, and would enable the whole of the Petts Wood and Knoll ward to remain in the Orpington constituency.

622. In light of their site visits and their analysis of representations and counter proposals across the South East London sub-region, our Assistant Commissioners recommended that we adopt an amended version of our initial proposals for the Bromley and Orpington constituencies as outlined above – which would keep the Petts Wood and Knoll ward in the Orpington constituency, and transfer the Biggin Hill ward and part of Darwin ward to the Bromley constituency in alignment with the new ward boundary surrounding Biggin Hill. They also recommended that we should maintain our initial proposals for the Beckenham constituency, noting the support for the uniting of Beckenham town centre, but that we should change the name to Beckenham and Penge in recognition of the significant Penge community.
623. Regarding the boroughs of Greenwich and Bexley, our Assistant Commissioners recommended no changes to our initial proposals for the constituencies of Bexleyheath and Crayford, Erith and Thamesmead, Greenwich and Woolwich, and Sidcup and Welling – except for reverting the name of Sidcup and Welling to its existing name of Old Bexley and Sidcup. They were persuaded by evidence of the historical significance of the Old Bexley name and noted that our proposed constituency was relatively unchanged from the existing constituency. Finally, our Assistant Commissioners did not recommend any changes to our initially proposed Eltham and Chislehurst constituency. They acknowledged the strong opposition to the joining of the Eltham and Chislehurst communities in a constituency, but they considered that any practicable alternatives would result in significant consequential disruption to other existing constituencies and the breaking of community ties elsewhere. We agreed with the recommendations of our Assistant Commissioners.

### **Consultation on the revised proposals**

624. We continued to receive support for our proposed Greenwich and Woolwich constituency, and opposition from the Plumstead and Shooters Hill areas for the same reasons as described earlier. We received a counter proposal to split the Glyndon ward along the new ward boundaries for the Borough of Greenwich so that the areas that were considered by some residents to be the Woolwich part of that ward could be included in the Greenwich and Woolwich constituency. We also received a small number of suggestions that our proposed Erith and Thamesmead constituency should instead be named either Plumstead and Erith, or Thamesmead and Plumstead.
625. We received few responses to our proposed Bexleyheath and Crayford, and Old Bexley and Sidcup constituencies, other than suggestions to also add Welling to the latter and name it Old Bexley, Sidcup and Welling. We did receive a counter proposal to split the Borough of Bexley wards of West Heath, and St. Mary's & St. James, in order to avoid including the Shooters Hill ward from the Borough of Greenwich in the Erith and Thamesmead constituency. We continued to receive opposition to our proposed Eltham and Chislehurst constituency due to the perceived lack of ties between these areas across the local authority boundary between the boroughs of Bexley and Bromley, but no new counter proposals to address this were received.

626. Our proposed Bromley and Biggin Hill constituency generated responses with both a little support, but mostly opposition. Some Bromley residents considered that they had little connection with Biggin Hill, and some Biggin Hill residents considered their town to have a similar character to Orpington, but that if their postcode were to change from TN to BR, they would welcome being included in a Bromley and Biggin Hill constituency. Some supported our Assistant Commissioners' previously rejected consideration to split the Petts Wood and Knoll, and Shortlands wards between alternative Bromley and Orpington constituencies, as some respondents considered this would maintain an urban Bromley constituency and a more rural Orpington constituency. Some residents of the Orpington constituency, concerned about noise from London Biggin Hill Airport, supported the inclusion of the Biggin Hill ward in the Orpington constituency so that both it and they were in a single constituency, allowing for a single MP who could deal with the issue on their behalf.
627. We received few comments regarding our proposed Beckenham and Penge constituency other than regarding its name. Some were concerned that when abbreviated it might be confused with the initials of a political party, and suggested that it might alternatively be named Penge and Beckenham, or Beckenham.

### **Final recommendations**

628. We have considered again the suggestion to use new local authority ward boundaries across the Borough of Greenwich and concluded that we are able to recommend a configuration which meets the statutory factors without splitting local authority wards as they existed on 1 December 2020. Little new or compelling evidence has been received to justify amending further either the Greenwich and Woolwich, or Erith and Thamesmead constituencies
629. We considered that the otherwise unsupported counter proposal to split wards in the Borough of Bexley had little merit, as it appeared to us to consider only the transfer of electors between constituencies, and not the other statutory factors. Little other evidence regarding the configuration of the Bexleyheath and Crayford, and Old Bexley and Sidcup constituencies was received. We considered that it would be inappropriate to add Welling to the name of the Old Bexley and Sidcup constituency, as the configuration is close to that of the existing constituency.
630. We noted the continuing opposition to our proposed Eltham and Chislehurst constituency, but our investigations found that the counter proposals were all more disruptive to the pattern of constituencies than our revised proposals, and would divide the Mottingham community, which is currently divided across the local authority boundary between the boroughs of Greenwich and Bromley.
631. We considered that responses to our proposed Bromley and Biggin Hill, and Orpington constituencies had received competing evidence during the consultation periods. We noted that including the Petts Wood and Knoll ward in a Bromley constituency was opposed at the first two consultation stages for breaking that ward's ties with the centre of Orpington, but a split of that same ward, and of the Shortlands ward, is supported by those who oppose our revised proposal for the Bromley and Biggin Hill constituency. Those who opposed our revised proposals made no mention of ties being broken between Biggin Hill and Orpington, asserting instead that they were of a similar character. We noted that Biggin Hill's road links are more directly with Bromley than with Orpington, using the A233, and that public transport routes connected Bromley and Biggin Hill. The counter proposal to divide the Shortlands, and Petts Wood and Knoll wards would do

so using polling district boundaries, and not the new local authority ward boundaries for which an Order was made on 1 April 2021. This contrasts with our proposed split of the Darwin ward, which does make use of the new ward boundaries. On the balance of the evidence provided, we consider our Bromley and Biggin Hill constituency and Orpington constituency to be an appropriate configuration when considering the statutory factors and our own guidance.

632. Our final recommendations in this sub-region are therefore for constituencies of: Beckenham and Penge; Bexleyheath and Crayford,; Bromley and Biggin Hill; Eltham and Chislehurst; Erith and Thamesmead; Greenwich and Woolwich; Old Bexley and Sidcup; and Orpington. These constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.





## North East

633. The North East region currently has 29 constituencies. Of these, six are within the permitted electorate range, 21 constituencies currently fall below the permitted range, and the electorates of just two constituencies are above. The North East region comprises 1,952,999 electors, giving it a mathematical entitlement to 26.61 constituencies. We therefore allocated 27 constituencies to the North East region, a reduction of two.
634. The North East region comprises the unitary authorities of: County Durham; Darlington; Gateshead; Hartlepool; Middlesbrough; Newcastle upon Tyne; North Tyneside; Northumberland; Redcar and Cleveland; South Tyneside; Stockton-on-Tees; and Sunderland.
635. We appointed two Assistant Commissioners for the North East – Tim Foy OBE and Simon Barnes – to assist us with the analysis of the representations received during the first two consultation periods. This included chairing public hearings, which were held in the region in order to hear oral evidence directly from the public. The dates and locations of these hearings were:
- Newcastle: 28–29 March 2022
  - Middlesbrough: 31 March–1 April 2022.

### Sub-division of the region

636. In formulating our initial proposals, we noted that the electorate of the North East of 1,952,999 results in it being entitled to 27 constituencies, a reduction of two. We then considered how this number of constituencies could be split across the region.
637. We noted that the electorate of the North of Tyne Combined Authority of just under 597,000, comprised the unitary authorities of Newcastle upon Tyne, North Tyneside, and Northumberland, results in a mathematical entitlement to 8.13 constituencies. We therefore decided to allocate the North of Tyne Combined Authority eight constituencies, and treated it as a stand-alone sub-region. Similarly, we noted that the Tees Valley Combined Authority – made up of the following unitary authorities of: Darlington; Hartlepool; Middlesbrough; Redcar and Cleveland; and Stockton-on-Tees – has an electorate of just under 495,000, which results in an entitlement to 6.74 constituencies. We therefore decided to allocate seven constituencies to Tees Valley, and treat it as a stand-alone sub-region also.
638. The electorate of the Borough of Gateshead is a little under 145,000, which results in the area being mathematically entitled to 1.97 constituencies. In formulating our initial proposals, we decided to allocate Gateshead two constituencies and we again decided to treat it as a sub-region.
639. County Durham, South Tyneside, and Sunderland, form part of the North East Combined Authority (the Borough of Gateshead also forms part of the combined authority). Together, County Durham, South Tyneside, and Sunderland has an electorate of just under 717,000, resulting in a mathematical entitlement to 9.77 constituencies. We therefore proposed allocating ten constituencies to the sub-region without crossing out of the North East Combined Authority.

640. The use of the sub-regions outlined above was largely supported during the consultation on the initial proposals. We also received objections to the split of sub-regions with an alternative arrangement suggested as a North East Combined Authority sub-region which comprised the areas of County Durham, Gateshead, South Tyneside, and Sunderland, due to the disruptive impact of proposing Gateshead as a separate sub-region. Respondents considered our initially proposed sub-regions did not allow for a pattern of constituencies that best reflected the statutory criteria, particularly in the areas of County Durham, South Tyneside, and Sunderland.
641. In formulating our revised proposals, we were persuaded by the evidence received to adopt an alternative sub-region combining County Durham, Gateshead, South Tyneside, and Sunderland. We considered that this sub-region allowed for improvements to the initial proposals in respect of the statutory factors, notably the improved configurations across the City of Durham, Jarrow, and the City of Sunderland. This is discussed further in the North East sub-region section later in this report.
642. In response to our revised proposals, we received support for our modified sub-regions, however, we did also receive opposition to our revised pattern, particularly in regards to its impact on the pattern of constituencies in the Borough of Gateshead. We also received a counter proposal that proposed combining parts of Tees Valley with the Yorkshire and the Humber region. We are not persuaded by the evidence for either of these alternatives. Firstly, in regards to our North East sub-region we received support for a number of constituencies in this sub-region, particularly that our revised pattern better reflected community ties. In regards to the cross-region proposal, our investigations suggested that crossing the regional boundary in North Yorkshire did not create a pattern of constituencies that better reflected the statutory factors in either the North East or Yorkshire and the Humber regions. Therefore, the sub-regions we propose as part of the final recommendations are:
- North of Tyne (including Newcastle upon Tyne; North Tyneside; and Northumberland)
  - North East (including County Durham; Gateshead; South Tyneside; and Sunderland)
  - Tees Valley (including Darlington; Hartlepool; Middlesbrough; Redcar and Cleveland; and Stockton-on-Tees).

## North of Tyne

### Initial proposals

643. Of the nine existing constituencies in North of Tyne, none were within the permitted electorate range. The following existing constituencies all fell below the permitted electorate range: Berwick-upon-Tweed; Blyth Valley; Hexham; Newcastle upon Tyne Central; Newcastle upon Tyne East; Newcastle upon Tyne North; and Wansbeck. The existing constituencies of North Tyneside and Tynemouth were both above the permitted electorate range.
644. In our initial proposals, we proposed that the existing Berwick-upon-Tweed constituency was expanded southwards to include the town of Morpeth and the Pegswood ward. As a result of the configuration of the constituency, we proposed it be named Berwick and Morpeth. We proposed a Blyth and Ashington constituency, that included both towns and also the areas of Bedlington, Choppington and Newbiggin. We proposed a Hexham constituency that was expanded to include

the Callerton & Throckley ward from the City of Newcastle upon Tyne, and the Longhorsley ward from the County of Northumberland.

645. We also proposed changes to the existing constituencies in the City of Newcastle upon Tyne. In our initial proposals we proposed a Newcastle upon Tyne East constituency that was expanded to include the ward of Arthur's Hill, and all of the Monument and the Dene & South Gosforth wards, which are currently divided between constituencies. Our proposed Newcastle upon Tyne North constituency was reconfigured to the east to include the Killingworth area of the Borough of North Tyneside and no longer included the Callerton & Throckley ward. We proposed a Newcastle upon Tyne West constituency that comprised ten City of Newcastle upon Tyne wards. To the east of the City, we proposed a reconfigured Tynemouth constituency which comprised ten Borough of North Tyneside wards, including the areas of Tynemouth in the east and Wallsend in the west. Our final proposal for the sub-region was a Whitley Bay and Cramlington constituency, that comprised five Borough of North Tyneside wards and nine County of Northumberland wards.

### **Consultation on the initial proposals**

646. In response to the consultation on the initial proposals, our proposed composition of constituencies across North of Tyne was both supported and opposed.
647. The boundary between our proposed Berwick and Morpeth, and Hexham constituencies was largely opposed in the Longhorsley ward, with counter proposals suggesting that the ward should be included in full or in part in the Berwick and Morpeth constituency. Respondents cited the close geographic proximity of the village of West Thirston in Longhorsley to the village of Felton in Shilbottle ward to the north. Some respondents also expressed concern at the exclusion of Alnwick from the name of the constituency. Those who made this argument noted that Alnwick is the county town for Northumberland and that it should be included in the constituency name. We also received other alternatives for the name of the constituency, including the proposal to name it North Northumberland.
648. Our proposed Blyth and Ashington constituency was largely supported for keeping the coastal communities together. However, we received a small amount of opposition to the configuration of this constituency, which sought to include the areas of Bedlington and Choppington in a counter proposal for the Hexham constituency.
649. The core of our proposed Hexham constituency was supported, but the inclusion of the wards of Longhorsley, and Callerton & Throckley were largely opposed, with a number of counter proposals provided in order to resolve these two issues. Those who opposed the inclusion of the Callerton & Throckley ward in the Hexham constituency said that the ward had community ties to the City of Newcastle and identified that the ward included places associated with the City, such as the airport. However, we also received some support for the inclusion of the Callerton & Throckley ward in the Hexham constituency with respondents citing community ties with Heddon-on-the-Wall.
650. The five proposed constituencies which included wards from the City of Newcastle upon Tyne and Borough of North Tyneside were largely opposed because of the perceived breaking of community ties and the crossing of borough boundaries. We received opposition to our proposed Whitley Bay and Cramlington constituency, with respondents outlining that Whitley Bay had shared community ties southwards along the coast to Tynemouth, rather than northwards

towards Cramlington. We received some support for our proposed Newcastle upon Tyne East and Tynemouth constituencies.

### **Revised proposals**

651. Our Assistant Commissioners considered the evidence received and they were not persuaded to recommend to us changes to the boundaries of the proposed constituencies of Berwick and Morpeth, Blyth and Ashington, and Hexham. They noted the opposition to the inclusion of the Longhorsley ward in the proposed Hexham constituency but they were not persuaded by the counter proposals to include the ward in the Hexham constituency, including those that proposed splitting the ward between the Berwick and Morpeth, and Hexham constituencies.
652. Further south in the sub-region they were persuaded to propose changes to the initial proposed pattern of constituencies. They considered that evidence had been received to suggest that the initial proposals broke community ties. Having investigated the counter proposals received from respondents the Assistant Commissioners were not completely satisfied that these would resolve all the issues. They had particular concern that the counter proposals that better reflect community ties in the City of Newcastle were at the detriment of breaking community ties in the areas of Bedlington and Choppington. They therefore investigated their own counter proposals which sought to reflect the community identity evidence received. In doing so, they considered that providing the best balance between the statutory factors could be achieved by splitting a number of wards between constituencies. They proposed dividing the Castle ward between a reconfigured Newcastle upon Tyne North constituency and a Cramlington and Killingworth constituency. This allowed Brunswick Village, and Hazelrigg, both of which are divided between the boroughs of Newcastle upon Tyne and North Tyneside, to not be divided. They proposed for Whitley Bay to be included in a modified Tynemouth constituency, which they considered reflected the community identity evidence received and better reflected the configuration of the existing constituency. They proposed that the Riverside ward be divided at the significant boundary that is the A19 between the constituencies of Newcastle upon Tyne East and Wallsend, and Tynemouth. Finally, they proposed that the Kingston Park South & Newbiggin Hall ward be divided at the A696 between Newcastle upon Tyne Central and West, and Newcastle upon Tyne North.
653. Having considered the evidence, we agreed with their proposal. We considered the alternative configuration of constituencies they proposed better reflected community ties and in some cases more closely resembled the existing pattern of constituencies.

### **Consultation on the revised proposals**

654. In response to the consultation on the revised proposals, we continued to receive opposition to the inclusion of the Longhorsley ward in the Hexham constituency rather than the Berwick and Morpeth constituency. We again received representations on the name of the Berwick and Morpeth constituency, with respondents suggesting that the name for this constituency should either include Alnwick or be changed to North Northumberland. We received evidence that the village and civil parish of Longhorsley lies on the road between Pegswood and Shilbottle wards, both of which are proposed to remain with the Berwick and Morpeth constituency. We received further evidence that West Thirston, part of the Thirston civil parish, forms a single community with Felton, joined by two bridges across the River Coquet, and that they share a church, school, community groups and shops.

655. We received several counter proposals, one of which would have required us to allocate the Bedlington and Choppington areas to Hexham, which we had already considered and rejected as a possible solution to the orphan ward of Callerton & Throckley being transferred from a Newcastle upon Tyne constituency into Hexham. Another would have split the Castle ward between Hexham, and Newcastle upon Tyne North, dividing both Brunswick Village and Hazelrigg. We received a further counter proposal that suggested swapping the entire Longhorsley ward for Rothbury between the Berwick and Morpeth, and Hexham constituencies, but found that, as the bulk of the population of Rothbury lies in the eastern side of that ward, and is separated from the Hexham constituency by the Northumberland National Park, this was not sufficiently compliant with the statutory factors. A further counter proposal to include two polling districts from Longhorsley ward in Berwick and Morpeth, B38LON and B44THI, the civil parishes of Longhorsley, and Thirston, would allow us to retain the rest of the revised proposals.
656. We received a small amount of opposition to the Blyth and Ashington proposal, from those concerned about the breaking of ties between Blyth and the Cramlington and Lynemouth areas. However, we again received support for this proposed constituency.
657. Our revised proposal for Cramlington and Killingworth was opposed due to the crossing of the boundary between the County of Northumberland and Borough of North Tyneside, and the consequent breaking of community ties across the existing Blyth Valley constituency. However, no counter proposal was received during the consultation on the revised proposals that suggested an alternative configuration of the constituency.
658. We continued to receive some opposition to the inclusion of the Callerton & Throckley ward in the Hexham constituency, with respondents considering this broke community ties with Newcastle upon Tyne, and the crossing of the local authority boundary, but the counter proposals to resolve this caused the breaking of community ties between Bedlington and Choppington, and Blyth and Ashington.
659. We received further opposition to our revised proposals across the City of Newcastle upon Tyne and Borough of North Tyneside, with the main issue being the crossing of local authority boundaries. Those who sought to formulate a different pattern of constituencies in this part of the sub-region generally submitted counter proposals identical to those received during earlier consultations, or supported reverting to the initial proposals. These included linking Whitley Bay and Cramlington to form a constituency, or including the areas of Bedlington and Choppington in the Hexham constituency.

### **Final recommendations**

660. Having considered the evidence received, we are not persuaded to amend the boundaries of our proposed constituencies in North of Tyne. We do consider it appropriate to amend one of the constituency names.
661. We have reflected on the evidence received in regards to Longhorsley and the arguments submitted that our revised proposals divide community ties in this area. We have again considered the counter proposals received and are not persuaded to adopt the configurations that transfer whole wards, as we consider that doing so breaks community ties and also does not reflect the geography of the area, particularly that of Northumberland National Park. We consider that the suggested split of the Longhorsley ward to reflect community ties, while

avoiding significant changes to the proposed pattern of constituencies in the sub-region, is a local issue, with no wider benefit to our configuration of constituencies across the sub-region, and we therefore conclude that this would not be appropriate. Therefore, we propose that the Longhorsley ward should be included in the Hexham constituency. Furthermore, we have decided to rename the Berwick and Morpeth constituency North Northumberland. We consider this name better reflects the geographic area of the constituency.

662. We are not persuaded to modify our revised proposals in the remainder of the sub-region. We consider that counter proposals submitted would not better reflect the statutory factors. Our final recommendations in this sub-region are therefore for constituencies of: Blyth and Ashington; Cramlington and Killingworth; Hexham; Newcastle upon Tyne Central and West; Newcastle upon Tyne East and Wallsend; Newcastle upon Tyne North; North Northumberland; and Tynemouth. These constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.

## **North East**

### **Initial proposals**

663. Our initially proposed Gateshead sub-region was based on the boundaries of the Borough and contained two existing constituencies, Blaydon and Gateshead. Both have electorates below the permitted range, and at present two of the Borough wards, Pelaw and Heworth, and Wardley and Leam Lane, are included in the Jarrow constituency. Jarrow is discussed below. We proposed expanding both of the Blaydon and Gateshead constituencies slightly eastwards, resulting in the sub-region being coterminous with the Borough of Gateshead.
664. The rest of this sub-region contained nine existing constituencies, and most of the Jarrow and Sedgfield constituencies. Of the existing constituencies, City of Durham, North West Durham, and Sunderland Central are all within the permitted electorate range. The following are all below the range: Bishop Auckland; Easington; Houghton and Sunderland South; Jarrow; North Durham; Sedgfield; South Shields; and Washington and Sunderland West.
665. When formulating our initial proposals we retained the Sunderland Central constituency unchanged. However, we proposed modifications to all the other constituencies in the sub-region. Our proposed South Shields constituency was similar to the existing though now also included the Borough of South Tyneside ward of Cleadon and East Boldon. We proposed that the remaining wards in the Borough of South Tyneside, including the town of Jarrow, be included in a Jarrow and Sunderland West constituency. This constituency included three wards from the City of Sunderland. We proposed a Washington and Sunderland West constituency, which comprised only City of Sunderland wards, including the five wards covering the town of Washington.
666. Our proposed North Durham constituency was again similar to the existing, though now also included the Burnopfield and Dipton ward. We proposed a North West Durham constituency that had been modified to reflect new local government ward boundaries. We proposed similar modifications to the existing Bishop Auckland constituency but proposed it include the Brandon ward and no longer the Shildon and Dene Valley ward, which we proposed be included in a Newton Aycliffe and Sedgfield constituency. Our proposed Seaham and Peterlee constituency

comprised 12 County of Durham wards and the City of Sunderland ward of Doxford. We proposed a City of Durham constituency which included six County of Durham wards, including those covering the City of Durham and three City of Sunderland wards, Copt Hill, Hetton, and Houghton. We noted that, in formulating our initial proposals, the City of Sunderland had been divided between five constituencies.

### **Consultation on the initial proposals**

667. In response to the consultation on our initial proposals, we received significant support for both our proposed Blaydon and Gateshead constituencies. Opposition was also received, which focused on the knock-on effect across the County Durham, South Tyneside and Sunderland sub-region, caused by our use of a Gateshead sub-region.
668. Our proposed Bishop Auckland and North West Durham constituencies were largely opposed because of the separation of Crook and Tow Law from Willington, which together form the Three Towns Area Action Partnership. One counter proposal received to resolve this did so by creating a detached part of the Bishop Auckland constituency, only accessible through neighbouring constituencies. Another relied on the retention of our Gateshead sub-region.
669. Our proposed City of Durham constituency was opposed, both in its extension to the east to include wards from Sunderland, where representations detailed the lack of any existing links, and the exclusion of County Durham wards to the south and west, which representations told us share community ties with the city.
670. Including City of Sunderland wards to create a Jarrow and Sunderland West constituency was opposed by many who saw no connection between these two areas. We also received opposition to our proposed Washington and Sunderland South constituency with respondents concerned that it broke community ties. Our proposal to retain the existing Sunderland Central constituency unchanged was widely supported. Similarly, our proposed South Shields constituency was largely supported.
671. The proposed Newton Aycliffe and Sedgefield constituency was opposed. Many respondents commented on the Coxhoe ward, outlining that due to its proximity it had links with the City of Durham rather than any similar links to Sedgefield to the south.
672. We received few comments on our North Durham proposal, perhaps due to the limited change suggested here, the addition of the single ward of Burnopfield and Dipton.
673. Our initial proposal for Seaham and Peterlee was largely opposed, due to the inclusion of Doxford, an orphan ward from City of Sunderland, in a constituency which is otherwise made up of County Durham wards. Representations outlined that the Doxford ward looks to the City of Sunderland, with which it shared community ties. Some representations also commented on the proposed name of the Seaham and Peterlee constituency, outlining that, given its similarity to the existing Easington constituency, it should retain that name.

### **Revised proposals**

674. In light of the representations received, our Assistant Commissioners recommended that we modify our initial proposals for the North East sub-region.



675. Our Assistant Commissioners considered that the initial proposals for five constituencies including wards from the City of Sunderland were disruptive to local ties across all except the Sunderland Central constituency. They compared these with the support received for the Blaydon and Gateshead constituencies, and counter proposals to instead divide the Borough of Gateshead between four constituencies and the City of Sunderland between three. Broadly speaking, the choice was to either disrupt Sunderland and Durham, or Gateshead. They concluded that dividing Gateshead in this way would help to reduce the breaking of community ties across Durham, Jarrow, Sunderland, and Washington. They investigated a number of counter proposals received and considered that the statutory factors in the sub-region could best be reflected by splitting a single ward – Trimdon and Thornley – between constituencies.
676. They therefore recommended: a Blaydon and Consett constituency, which would pair the two towns across the Borough of Gateshead with County Durham; a Gateshead and Whickham constituency, to include three wards around the Whickham area; a Jarrow constituency, to include four Borough of Gateshead wards and seven Borough of South Tyneside wards; a South Shields constituency as initially proposed; and a Washington constituency that comprised seven City of Sunderland wards and two Borough of Gateshead wards, Birtley and Lamesley.
677. Our Assistant Commissioners proposed to retain a Houghton and Sunderland South constituency unchanged from the existing, other than to additionally include the City of Sunderland St. Anne's ward. They recommended no change to the Sunderland Central constituency as initially proposed, particularly given this had been largely supported during the consultation.
678. They recommended: a Bishop Auckland constituency that extended further north than the existing to include the County of Durham wards of Crook, Tow Law, and Weardale. They proposed a City of Durham constituency that was entirely within the County of Durham. They proposed: an Easington constituency extended slightly to its west including part of the Trimdon and Thornley ward; a Newton Aycliffe and Spennymoor constituency including a split of the Trimdon and Thornley ward with the Easington constituency, which allowed for the unification of Spennymoor in a single constituency; and a North Durham constituency that was similar to the existing but now also included the Lanchester ward. We agreed with their recommendations. We recognised that, while this pattern divided the Borough of Gateshead between four constituencies, we considered it resulted in a pattern of constituencies that were most closely aligned with the existing configuration and better reflected the community ties evidence received.

### **Consultation on the revised proposals**

679. In response to the consultation on our revised proposals, we received a mixture of support and opposition to our pattern of constituencies.
680. Our proposals across the Borough of Gateshead were largely opposed. Our proposed Blaydon and Consett constituency was opposed because of the crossing of local authority boundaries, the lack of links between the two areas, and the inclusion of the Castleside area in our proposed North Durham constituency in spite of its close proximity and links with Consett. Our Gateshead proposal was largely opposed because of its dividing of the town of Gateshead, although there was a small amount of support. Our proposed Jarrow constituency was opposed due to the inclusion of four Gateshead wards with which residents on opposite sides of the borough boundary felt no affinity.

681. Our proposed South Shields constituency was largely supported, although some respondents considered the configuration divided the Borough of South Tyneside wards of Boldon Colliery, and Cleadon and East Boldon between constituencies. Our proposed Washington constituency received some opposition due to its crossing of local authority boundaries. Some respondents also had concerns that the constituency crossed the A1 road, however, during earlier consultation stages we received evidence of historic community ties crossing the A1. As under our revised proposals the Borough of Gateshead had been divided between four constituencies, we received some opposition to only one of the proposed constituencies including Gateshead in the name, and to Washington not including the name of any other parts of the proposed configuration, such as Birtley, Gateshead, or Sunderland, which were all suggested to be included.
682. Our Houghton and Sunderland South, and Sunderland Central constituencies were largely supported, with the addition of the St. Anne's ward to Houghton and Sunderland South noted as a suitable addition.
683. We received some opposition to our Bishop Auckland proposal which was twofold: the division of the well-liked existing North West Durham constituency into four constituencies and the consequent breaking of community ties; and the separation of the wards of Crook and Tow Law from Willington in the previously mentioned Three Towns Area Action Partnership. There were a small number of calls for the constituency name to be changed to include South and/or West Durham or Weardale, but without any consensus as to what that name should be. Our proposed City of Durham constituency was largely supported, particularly the central core of the constituency, but was both supported and opposed with the addition of the rural wards of Deerness, Esh and Witton Gilbert, and Willington and Hunwick to the west, and opposed because of the inclusion of Coxhoe ward in the Newton Aycliffe and Spennymoor constituency. Our Easington constituency was largely supported, apart from a small number of suggestions for it to be renamed East Durham. There was some opposition to the addition of the Lanchester ward in the North Durham constituency, which was otherwise supported.

### **Final recommendations**

684. We noted the representations regarding whether we should revert to our initial proposals for the Blaydon and Gateshead constituencies. We consider that the disruption in the initial proposals to community ties across the boroughs of South Tyneside and Sunderland, and to the City of Durham, is greater than that to the County of Durham and the Borough of Gateshead in our revised proposals. We note that we also received representations supporting our revised pattern of constituencies, with respondents outlining how they better reflected community ties. Having considered the evidence received, we are not recommending any changes to the boundaries of our revised proposals for the North East sub-region. We are persuaded to change the names of three constituencies, including parts of the Borough of Gateshead, to make them more representative of their areas. These are Gateshead Central and Whickham, Jarrow and Gateshead East, and Washington and Gateshead South.
685. Our final recommendations in this sub-region are therefore for constituencies of: Bishop Auckland; Blaydon and Consett; City of Durham; Easington; Gateshead Central and Whickham; Houghton and Sunderland South; Jarrow and Gateshead East; Newton Aycliffe and Spennymoor; North Durham; South Shields; Sunderland Central; and Washington and Gateshead South. These

constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.

## **Tees Valley**

### **Initial proposals**

686. Of the seven existing constituencies in this sub-region, only three have electorates that are currently within the permitted electorate range: Hartlepool, Middlesbrough South and East Cleveland, and Stockton South. The remaining four all are below the range. The Tees Valley Combined Authority has an electorate of a little under 495,000, giving a mathematical entitlement to 6.74 constituencies. Under the initial proposals the number of constituencies in this sub-region would remain at seven. In the initial proposals, we proposed changes to all of the existing constituencies in this area apart from Hartlepool, which we retain unchanged.
687. We added a single ward, Heighington & Coniscliffe, to create our proposed Darlington constituency. The boroughs of Middlesbrough, and Redcar and Cleveland have new local government ward boundaries and, although two of the three constituencies have electorates within the permitted range, all three had to be changed in order to reflect that. In addition to the required ward boundary changes, we included two Thornaby wards in our proposed Middlesbrough constituency in order to avoid crossing the River Tees, the village of Marske-by-the-Sea in our Middlesbrough South and East Cleveland constituency, and Ladgate and Marton East to our Redcar and Eston constituency. We included Parkfield and Oxbridge ward in our proposed Stockton North constituency, and included Western Parishes ward in our proposed Stockton West constituency, which also included the Borough of Darlington wards of Hurworth, and Sadberge & Middleton St. George.

### **Consultation on the initial proposals**

688. The inclusion of the wards of Hurworth, and Sadberge & Middleton St. George in a Stockton West constituency was opposed by residents in both wards, as they feel that they are part of Darlington and all their links, both economic and social, lie with that town. Our retention of the existing Hartlepool constituency was widely supported.
689. The addition of two of the three Thornaby wards to a Middlesbrough constituency was strongly opposed, as residents told us their links are with Stockton rather than Middlesbrough, and that it should remain in a single constituency, but no counter proposals to achieve this were received. Our Assistant Commissioners noted that the only way to achieve this would be to have a constituency to include most of Middlesbrough, and part of Stockton, crossing the more significant boundary of the River Tees. We did receive a small number of representations that considered Thornaby should be reflected in the constituency name. We received counter proposals for Middlesbrough, Middlesbrough South and East Cleveland, and Redcar and Eston which sought to more closely align to the existing constituencies and rename Redcar and Eston to its existing name of Redcar to reflect that greater similarity.
690. The proposed constituencies of Stockton North and Stockton West were opposed, as noted above, but also supported in regards to the wards moving between the two existing Stockton constituencies.

### **Revised proposals**

691. Our Assistant Commissioners noted that, while the initial proposals were opposed across most of the sub-region, few practical solutions existed within the sub-region and region boundaries, which had been widely supported and respected the physical geography of the area. Our Assistant Commissioners investigated adding the Hurworth ward to the Darlington constituency and noted that this would require including the Heighington & Coniscliffe ward from the west of the Borough of Darlington to the Stockton West constituency. This proposal was not suggested during consultation and our Assistant Commissioners considered that, given its proximity, it is clearly linked to Darlington rather than any part of Stockton, whereas the wards of Huworth and Sadberge & Middleton St. George do sit between the two towns.
692. Our Assistant Commissioners considered the counter proposals for the Middlesbrough, Middlesbrough South and East Cleveland, and Redcar and Eston constituencies and recommended them due to their greater similarity to the existing constituencies than our initial proposals. This transferred the Borough of Redcar and Cleveland wards of Longbeck, Saltburn and St. Germain's to a proposed Redcar constituency, and the Borough of Middlesbrough wards of Ladgate, Marton East, and Park End & Beckfield to the Middlesbrough South and East Cleveland constituency. We accepted their recommendations and adopted these constituencies as part of our revised proposals, including reverting to the name of Redcar rather than Redcar and Eston.
693. Therefore, our revised proposals for Tees Valley were for constituencies of: Darlington; Hartlepool; Middlesbrough and Thornaby East; Middlesbrough South and East Cleveland; Redcar; Stockton North and Stockton West.

### **Consultation on the revised proposals**

694. In response to the consultation on our revised proposals, we received some support for our revised pattern, and continued opposition to the inclusion of part of Thornaby in our Middlesbrough and Thornaby East constituency, and to the villages between Darlington and Stockton being included in the Stockton West constituency. A single counter proposal to resolve the Thornaby issue, and the Hurworth part of the Darlington villages issue was received, which required crossing the sub-region and region boundary into the Yorkshire and the Humber region. Other counter proposals attempted to attach the Thornaby ward of Village to our proposed Stockton South constituency, but did so where there is no crossing of the River Tees. We received further opposition to the configuration of all three constituencies across Middlesbrough, and Redcar and Cleveland, but no counter proposals were forthcoming to resolve this.
695. We received small amounts of opposition to our proposed Hartlepool constituency which was otherwise supported, from residents of Wynyard, which is divided by borough boundaries between Hartlepool and Stockton.
696. There were some suggested name changes such as Middlesbrough Central rather than Middlesbrough and Thornaby East, Guisborough and East Cleveland rather than Middlesbrough South and East Cleveland, and Redcar and West Cleveland or South Tees instead of Redcar, but none attracted more than a modicum of support.

## **Final recommendations**

697. We have considered the evidence received and are not making changes to the boundaries of our proposed constituencies in Tees Valley. We recognise the opposition received regarding Hurworth, and Sadberge & Middleton St. George, but conclude that there is no satisfactory configuration which might resolve this while ensuring constituencies are all within the permitted electorate ranges. Similarly, we note the concerns regarding the division of Thornaby and Wynyard between constituencies. We did investigate alternative proposals but found that the issues in Wynyard relate to local authority services being divided across the village, which would not be resolved by both parts being in a single Parliamentary constituency. The division of Thornaby between constituencies is regrettable, but the only solution would require changes to the otherwise supported Tees Valley sub-region and the North East and Yorkshire and the Humber regions. We also considered the representations that proposed alternative constituency names across the sub-region. We were not persuaded that the alternative names better reflected the geographic configuration of the proposed constituencies.
698. Our final recommendations for Tees Valley are therefore for constituencies of: Darlington; Hartlepool; Middlesbrough and Thornaby East; Middlesbrough South and East Cleveland; Redcar; Stockton North; and Stockton West. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## North West

699. The North West currently has 75 constituencies. Of these constituencies, 33 have electorates within the permitted electorate range. The electorates of 28 constituencies currently fall below the permitted range, while the electorates of 14 constituencies are above. Our proposals reduce the number of constituencies in the region by two, to 73.
700. The North West comprises the counties of Cumbria and Lancashire (including the unitary authorities of Blackburn with Darwen, and Blackpool), the unitary authority areas of Cheshire (Cheshire East; Cheshire West and Chester; Halton; and Warrington), and the metropolitan areas of Greater Manchester and Merseyside (which are covered by metropolitan boroughs).
701. We appointed two Assistant Commissioners for the North West – Andy Brennan QPM and David Brown QFSM – to assist us with the analysis of the representations received during the first two consultation periods. This included chairing public hearings, which were held in the region in order to hear oral evidence directly from the public. The dates and locations of these hearings were:
- Manchester: 3–4 March 2022
  - Liverpool: 7–8 March 2022
  - Chester: 10–11 March 2022
  - Preston: 14–15 March 2022
  - Kendal: 17–18 March 2022.

### Sub-division of the region

702. In formulating our initial proposals, we noted that the electorate of the North West of 5,381,549 results in it being entitled to 73 constituencies, a reduction of two. We then considered how this number of constituencies could be split across the region.
703. The distribution of electors across the three counties and two metropolitan areas of the North West region is such that allocating a whole number of constituencies to each county and metropolitan area, while keeping each constituency within the permitted electorate range, is not possible.
704. Cumbria's electorate of 389,717 results in a mathematical entitlement to 5.31 constituencies. This number is too large for the county to be allocated five whole constituencies, and too few for six. As such, we could not consider it as a sub-region in its own right and it was therefore necessary for Cumbria to be paired with another county. Our options for pairing Cumbria with another county were limited by the Irish Sea to the west, and the border with Scotland to the north. Since we are not proposing that any regional boundaries should be crossed unless we have received compelling reasons to do so, we did not propose that Cumbria be paired with Northumberland or County Durham in the North East region, or North Yorkshire in the Yorkshire and the Humber region. We noted that Lancashire (with Blackburn with Darwen, and Blackpool) has an electorate of 1,114,043. With a combined electorate of 1,503,760, a sub-region of Cumbria and Lancashire would be mathematically entitled to 20.49 constituencies and would allow for 20 whole

constituencies to be allocated to the sub-region, albeit with electorates that would be at the upper end of the permitted electorate range. We therefore proposed an allocation of 20 constituencies to the sub-region of Cumbria and Lancashire.

705. The electorate of the metropolitan area of Merseyside, of 1,049,947, results in a mathematical entitlement to 14.31 constituencies. However, the electorate in the Metropolitan Borough of Wirral, at 244,680, gives the borough a mathematical entitlement to 3.33 constituencies. This means that there cannot be a whole number of constituencies which are wholly contained within the Wirral borough boundary. It was therefore necessary for a constituency to either cross between the Wirral and the Cheshire West and Chester unitary authority, or for a constituency which spans the River Mersey between the Wirral and the City of Liverpool. We noted that in previous reviews, the crossing of the River Mersey had been strongly opposed, so we proposed to cross the Wirral and Cheshire West and Chester boundary and treated Merseyside and Cheshire as a sub-region. Their combined electorate of 1,877,361 results in a mathematical entitlement to 25.58 constituencies, giving an allocation of 26 whole constituencies. We also proposed a second cross-county boundary constituency within this sub-region, using the natural geographic boundary of the River Mersey to bisect the Borough of Halton.
706. Despite considering Lancashire and Merseyside in separate sub-regions, we proposed a constituency which crossed the county – and sub-region – boundary, combining four wards of the District of West Lancashire with the town of Southport. Although this crossing is not required by the electorates, we considered that this allowed us to better reflect both local ties and the boundaries of existing constituencies, and results in a more appropriate pattern of constituencies across much of the North West region.
707. We noted that the electorate of Greater Manchester – of 2,000,428 – results in a mathematical entitlement to 27.26 constituencies. As such, we were able to allocate Greater Manchester 27 whole constituencies, which is the same as its existing allocation, and that it could be considered as a sub-region in its own right, with no requirement for any constituencies to cross the boundary of the metropolitan area.
708. The use of the sub-regions outlined above was largely supported during the consultation on the initial proposals. We did receive some objections to crossing the boundary between Southport in Merseyside and the Borough of West Lancashire, with suggestions that the crossing of the local authority boundaries should be elsewhere. We also received counter proposals that crossed the boundaries of Greater Manchester, which effectively resulted in there being no sub-regions in the North West.
709. In formulating the revised proposals, while we acknowledged the opposition in some of the representations to the crossing between Southport and West Lancashire, we considered there were benefits of the crossing for the region as a whole and we did not recommend changing the sub-region groupings for the revised proposals.
710. In response to our revised proposals, we did not receive any further evidence that would justify the use of alternative sub-regions to those we adopted in our revised proposals. Therefore, the sub-regions we propose as part of the final recommendations are:
- Cumbria and Lancashire (including Blackburn with Darwen, and Blackpool, with, additionally, the crossing between Southport and West Lancashire)

- Merseyside and Cheshire
- Greater Manchester.

## Cumbria and Lancashire

### Initial proposals

711. Of the six existing constituencies in Cumbria, none were within the permitted range, and it was necessary to cross the county boundary with Lancashire. Of the 16 existing constituencies in Lancashire, seven were within the permitted range, with two constituencies above the range, and seven under. The pairing of Cumbria with Lancashire as a sub-region results in an allocation of 20 constituencies, a reduction of two
712. Under our initial proposals, the electorate of the City of Carlisle was such that the ward of Dalston & Burgh was transferred to the Workington constituency, and no further changes were proposed to the Carlisle constituency. We proposed a Workington constituency that is more closely aligned with the boundaries of the Allerdale district than the existing constituency and contained all the wards of Allerdale district, except the Crummock & Derwent Valley, and the Keswick wards, plus the Dalston & Burgh ward, as mentioned above.
713. We proposed a Westmorland and Eden constituency, which contained the entirety of Eden district, and from South Lakeland district the wards of Sedbergh & Kirkby Lonsdale, Kendal Rural, and the five wards which constitute the town of Kendal itself. The Barrow and Furness constituency was extended eastwards across the Leven Estuary in order to avoid significant disruption. This was therefore largely the same as the existing constituency, but now included the Cartmel and Grange wards, and no longer included the Broughton & Coniston ward, which was included in the proposed Copeland and The Western Lakes constituency. This was similar to the existing Copeland constituency, but was extended eastwards to include the Broughton & Coniston, Ambleside & Grasmere, and Windermere wards. We proposed the division of the Bowness & Levens ward between the Copeland and the Western Lakes, and Morecambe and South Lakeland constituencies, so as not to divide Lake Windermere between constituencies.
714. Our proposed Morecambe and South Lakeland constituency crossed the county boundary between Cumbria and Lancashire and additionally included the Burton & Crooklands, and Arnside & Milnthorpe wards. We considered the existing Morecambe and Lunesdale constituency to be the most suitable for extension across the Cumbria and Lancashire county boundary and, aside from the addition of the Cumbrian wards, the bulk of the constituency would remain largely unchanged. We included in the Morecambe and Lunesdale constituency the Skerton West ward, with the Skerton East and Upper Lune Valley wards being included in the Lancaster constituency, which was significantly different from the existing Lancaster and Fleetwood constituency and which would no longer extend across the River Wyre into Fleetwood. The town of Fleetwood was included in our proposed Blackpool North and Fleetwood constituency, which would also contain the settlements of Cleveleys and Thornton.
715. In order to increase the electorate of the existing Blackpool South constituency we proposed that it be extended northwards to include the Claremont, Layton, Park, and Warbreck wards. We proposed relatively minor change to the existing Fylde constituency, but included three



wards that comprise the town of Poulton-le-Fylde. We proposed that the Preston constituency should include the Garrison, Sharoe Green, Greyfriars, and Cadley wards, thereby including the Fulwood area, and that the two City of Preston wards of Fishwick & Frenchwood, and Ribbleton be included within the Ribble Valley constituency. This constituency was significantly reconfigured and would no longer include most of the town of Bamber Bridge, nor the wards of East Whalley, Read & Simonstone, Whalley & Painter Wood, and Billington & Langho, which were included in our proposed Hyndburn constituency. This is largely the same arrangement as the existing constituency, but would no longer include wards from the Borough of Rossendale.

716. Although six existing constituencies – Hyndburn; Rossendale and Darwen; Blackburn; Chorley; South Ribble; and West Lancashire – were able to remain unchanged, other than realigning constituency boundaries with changes to local government ward boundaries, we considered that maintaining all of them unchanged would result in significant disruption across the rest of Lancashire and therefore not best reflect the statutory factors overall. We therefore proposed a number of changes to the existing configuration of constituencies. Our proposed Blackburn constituency was otherwise unchanged apart from the realignment of the constituency boundary in the south to reflect local government ward changes, thereby aligning the constituency boundary with that of the town’s southern boundary, along the M65, and no longer dividing the town of Blackburn.
717. The existing constituencies of Burnley and Pendle required additional electors to bring them within the permitted range. We therefore included the wards of Brierfield East & Clover Hill, Brierfield West & Reedley and Briercliffe with Lanehead in the Pendle constituency, and extended the Burnley constituency south by including the five easternmost wards of the Borough of Rossendale, and renamed it Burnley and Bacup. Following these proposed changes, the existing Rossendale and Darwen constituency was reconfigured to bring it within the permitted electorate range with the inclusion of the Greenfield and Worsley wards. We also proposed the inclusion of the Adlington & Anderton, and Chorley North East wards, from the Borough of Chorley, and renamed the constituency West Pennine Moors. In addition to the changes mentioned, we proposed that the Chorley constituency would include the Eccleston, Heskin & Charnock Richard ward, and the Croston, Mawdesley & Euxton South ward, thereby resulting in a Chorley constituency that would remain contained wholly within the Borough of Chorley.
718. We proposed that the existing Southport constituency be extended across the county boundary into its rural hinterland within Lancashire. Although the existing Southport constituency could remain wholly unchanged, we consider that this would result in significant disruptive knock-on effects throughout the North West, with the consequences extending across Lancashire, Merseyside and Cheshire. The four Borough of West Lancashire wards of North Meols, Hesketh-with-Becconsall, Tarleton, and Rufford were therefore included in the proposed Southport constituency, as we considered that these wards were already somewhat separated from the remainder of Lancashire by the River Ribble to the north, and the River Asland/River Douglas to the east. Our proposed South Ribble constituency contained the entirety of the town of Leyland, and most of the town of Bamber Bridge. Our proposals also allowed for a West Lancashire constituency which was wholly unchanged.

### **Consultation on the initial proposals**

719. The initial proposals in Cumbria were supported in their entirety by some respondents, claiming they better reflected both local government boundaries and the existing constituencies across Cumbria than did any alternatives provided. The proposed Copeland and the Western Lakes constituency was described as 'geographically coherent'. The proposed Barrow and Furness constituency also received some support, despite assertions that the Cartmel Peninsula had nothing in common with Barrow.
720. However, opposition significantly outweighed the support. There was opposition to the transfer of the Dalston & Burgh ward to the Workington constituency and proposals to retain the ward within the Carlisle constituency, at the expense of the Brampton & Fellside ward, or to split the Dalston & Burgh ward in some way. There were also calls to change the name of the proposed Westmorland and Eden constituency to Penrith, Eden and Kendal.
721. Two significant counter proposals and a large number of members of the public provided evidence that the initial proposals had little to no regard to the physical geography or communities within Cumbria. Strong views were expressed that we had fundamentally misunderstood the geographical and demographic characteristics of the sub-region, and that our proposals in Cumbria, with the exception of Carlisle, were flawed and should not stand. There were particular concerns that the initial proposals paid no attention to what was the highest mountain range in England, and which formed a significant physical boundary between communities. It was also claimed that Kendal and Penrith have never before been in a constituency together. The counter proposals in opposition both followed the same fundamental approach and, instead of dividing the existing Westmorland and Lonsdale constituency, kept most of it intact, with no inclusion of wards to the east of the Lake District with Whitehaven or Workington. These two towns would instead be included in the same constituency, while in the north of the county a constituency would stretch from Alston in the east to the Solway Firth in the west, including the town of Penrith, but none of the southern part of the Eden Valley.
722. The requirement for a cross-county boundary constituency between Cumbria and Lancashire was broadly accepted, although there were differing views on how this could be achieved, with both support and opposition to the proposed Morecambe and South Lakeland constituency.
723. There was a strong view that the two wards of Skerton East and Skerton West should be united within the same constituency. Some said this should be the Morecambe and South Lakeland constituency, but others claimed that Skerton was part of Lancaster, including a petition in which 120 of the 121 signatories identifying as residents of Skerton said that the wards should be together, but within the Lancaster constituency. There was further support for the exclusion from the Lancaster constituency of the town of Fleetwood. As the constituency would contain a geographically larger component from the Wyre borough than currently, it was proposed that its name be changed to reflect this. It was also suggested that the Elswick and Little Ecclestone ward should be included within the same constituency as the Great Ecclestone ward, which under our initial proposals were separated.
724. With regard to the Blackpool North and Fleetwood, Blackpool South, and Fylde constituencies, relatively few representations were received, with both support and proportionally little opposition. Of the representations that opposed the initial proposals, the majority came from residents of the

Carleton ward, who wished to be included in the same constituency as Poulton-le-Fylde, instead of Blackpool North and Fleetwood.

725. The south and east of Lancashire were areas in the North West region that received some of the most representations, overwhelmingly in opposition to the initial proposals. In Preston, there was significant opposition to the initial proposals, and calls for the Fishwick & Frenchwood, and Ribblesdale wards to be included within the constituency rather than the Greyfriars and Sharoe Green wards, which comprise the Fulwood area, as in the existing constituency. Evidence was provided that the wards of Greyfriars and Sharoe Green were of a fundamentally different character to the rest of urban Preston.
726. As mentioned previously, the existing constituencies of Hyndburn, Rossendale and Darwen, Blackburn, Chorley, South Ribble, and West Lancashire were all able to remain unchanged, other than to realign constituency boundaries with changes to local government ward boundaries. Although the only change we had proposed to the Blackburn constituency was the realignment of the constituency boundary in the south to reflect local government ward changes, there was substantial and overwhelming opposition from the Blackburn South & Lower Darwen ward, with the residents of the ward being unequivocal that they belong with Darwen, rather than Blackburn.
727. The responses to the proposals for the Ribblesdale and Pendle constituency were largely in opposition. Many respondents suggested that there were no community ties between the Billington & Langho, East Whalley, Read & Simonstone, and Whalley & Painter Wood wards and the town of Accrington (which is included in the Hyndburn constituency), and that Whalley is intrinsically linked more to Clitheroe and the wider Ribblesdale than to Hyndburn. Many said that our proposals would arbitrarily divide the town of Whalley by retaining the Whalley Nethertown ward in the Ribblesdale constituency, while others stated that the Sabden area also had links to Whalley, and that all these areas should be considered as one in any revised proposals. The inclusion of the town and area around Bacup in a constituency with Burnley was largely opposed.
728. The representations received for the proposed constituencies in the rest of south Lancashire were almost wholly in opposition. The West Pennine Moors constituency in particular was almost universally opposed and described as 'anomalous'. It was claimed that this constituency would arbitrarily divide both Chorley and Rossendale and include parts of both boroughs with areas of Darwen, with which, many respondents said, they had little to nothing in common. It was claimed there were no significant links of either transport or community between the Adlington & Anderton and Chorley North East wards, and Blackburn with Darwen, and that these wards looked unequivocally to Chorley. However, there was some limited support for the approach taken here.
729. The South Ribble constituency was broadly well received at initial proposals, despite the newly proposed constituency including wards from two local authorities. However, it was suggested that the Walton-le-Dale East and Walton-le-Dale West wards should both be included within the South Ribble constituency, and that the town of Bamber Bridge should be united in Ribblesdale, with both Bamber Bridge East and West wards being included in the same constituency as the Coupe Green & Gregson Lane ward.
730. There were some calls for the Rufford ward to be included within the West Lancashire constituency rather than the Southport constituency as proposed, with detailed evidence provided that the wards of Hesketh-with-Beaconsall, North Meols, Rufford, and Tarleton,

comprised the 'Northern Parishes' and should be kept together. There were also calls for the Southport constituency to be renamed Southport and Douglas, in order to reference areas in both local authorities.

### Revised proposals

731. Our Assistant Commissioners decided to visit Cumbria. They considered that there were, in effect, only two solutions for the larger part of Cumbria, which would have to be based on which of these seemingly mutually exclusive approaches better reflected the statutory criteria (aside from our proposed Carlisle constituency). These two main options proved to be a fundamentally difficult choice between different statutory factors: the initial proposals were arguably stronger with regard to respecting existing local government boundaries, while the alternative put forward would arguably be stronger in relation to community ties. Neither approach could be reasonably weighed over the other in regard to the existing constituencies, due to the scale of change in both, which required either the wholesale reconfiguration of the Westmorland and Lonsdale constituency (as initially proposed), or at least one constituency having to stretch east-west across the whole county (in the alternative). None of the counter proposals received would be without disadvantages, but, in view of the evidence received, neither were the initial proposals. Our Assistant Commissioners considered, however, that the initial proposals might not be the option to best respect the statutory criteria and proposed a pattern of constituencies that was a mixture of those proposed in the counter proposals. We agreed with the pattern proposed by our Assistant Commissioners, and adopted it as part of our revised proposals. Details of the reconfigured constituencies are set out below.
732. In the south-west of the county, we decided to split the Broughton & Coniston ward along the boundary between the existing Barrow and Furness constituency, and the existing Westmorland and Lonsdale constituency, thereby retaining an existing constituency boundary, and meeting a requirement for the alternative scheme to be adopted. However, we did not feel there were sufficient grounds to split the Black Combe & Scafell ward, which was proposed by some respondents, and we included the whole of this ward – and the Millom ward – in the Barrow and Furness constituency, although we acknowledged that this constituency would cross three local authorities and contain a split ward. The northern boundary of this constituency would follow the River Mite as far as Eskdale, where it would then follow the ridgelines of Illgill Head, Scafell Pike, and Great End. We proposed that the remainder of the split Broughton & Coniston ward should sit within a proposed Westmorland and Lonsdale constituency, as it is currently. This constituency would contain all the wards from the South Lakeland district that are included in the existing constituency, with the exception of Arnside & Milnthorpe, Burton & Crooklands, and Sedbergh & Kirkby Lonsdale. It would also include all the wards within the Eden district that are to the south of the town of Penrith, together with the Dacre, Greystoke, and Ullswater wards. We considered that our revised proposals addressed many of the objections to the initial proposals in this area, as they reduced the division of the South Lakeland local authority and restored the majority of the existing Westmorland and Lonsdale constituency.
733. We proposed a Whitehaven and Workington constituency that would contain the entirety of Copeland borough, aside from the two wards in the Barrow and Furness constituency. It would also include both the Crummock & Derwent Valley, and Keswick wards, which are part of the existing Copeland constituency. and the remaining Allerdale borough wards south of the River Derwent.

734. We proposed no revisions to the initially proposed Carlisle constituency, but that the Dalston & Burgh ward be included in a Penrith and Solway constituency, which would include all the remaining wards in the Eden Valley as well as the 15 most northern wards of the Borough of Allerdale. In the west of Allerdale, the constituency's southern boundary would be the River Derwent as far as Broughton Cross, and then follow the ward boundaries to the south of Cockermouth, and the north of Keswick. This constituency would include areas from three local authorities, and the Dalston & Burgh ward would continue to be an orphan ward. This constituency would stretch east to west across Cumbria, from Alston to the Solway Firth, an outcome that the initial proposals specifically sought to avoid, but we considered that it allowed for the formulation of constituencies across Cumbria overall that would better reflect the community identity evidence received. We considered that, while our revised proposals for Cumbria may initially seem to be worse than the initial proposals with regard to local government boundaries, the incoming unitary authorities for Cumbria, which will replace the current authorities, will mitigate these concerns to a large extent.
735. We revised the cross-county boundary constituency between Cumbria and Lancashire to propose that the existing constituency name of Morecambe and Lunesdale should be retained: the Arnside & Milnthorpe, Burton & Crooklands, and Sedbergh & Kirkby Lonsdale wards would be the Cumbrian component of the constituency that would cross between Cumbria and Lancashire. Our Assistant Commissioners visited the Morecambe and Lancaster areas and concluded that the Skerton East and Skerton West wards should both be included in the Lancaster constituency, which was renamed Lancaster and Wyre. We agreed with their recommendation. We were not persuaded that the Elswick and Little Ecclestone ward should be included within the same constituency as the Great Ecclestone ward, as this would result in both an orphan ward (Elswick and Little Ecclestone), and the proposed Lancaster and Wyre constituency containing elements of three local authorities.
736. In Blackpool and The Fylde, despite some opposition from residents of the Carleton ward who wished to be included with Poulton-le-Fylde, overall the initial proposals were not particularly contentious in this area and we proposed no further change to the composition and names of the three constituencies of Blackpool North and Fleetwood, Blackpool South, and Fylde.
737. Following the site visits by our Assistant Commissioners, we accepted that the Greyfriars and Sharoe Green wards, which comprised Fulwood, were suburban and of a fundamentally different character to the remainder of Preston. We therefore proposed that the Preston constituency should include the Fishwick & Frenchwood, and Ribblesdale wards, which our Assistant Commissioners had also visited and which appeared to them to be more akin to the urban core of Preston, and included the Greyfriars and Sharoe Green wards in the Ribble Valley constituency.
738. In the south of Lancashire, the representations were overwhelmingly in opposition to the initial proposals. The West Pennine Moors constituency in particular was almost universally opposed. The following existing constituencies were all able to remain unchanged, other than to realign constituency boundaries with changed ward boundaries: Hyndburn; Rossendale and Darwen; Blackburn; Chorley; South Ribble; and West Lancashire. We therefore proposed a revised configuration that more closely matched the existing constituencies, with the four existing constituencies of Blackburn, Chorley, Hyndburn, and Rossendale with Darwen all remaining unchanged, apart from the need to realign constituencies with new local government ward boundaries. The Adlington & Anderton, and Chorley North East wards would therefore be returned

to the Chorley constituency, as had been suggested in many of the representations. This would also remove any requirement to split the Blackburn South & Lower Darwen ward, as had been proposed by some. We proposed that the Burnley constituency would be largely the same as the existing constituency, but, in order to bring the constituency within the permitted range, it would also include the two Pendle district wards of Brierfield East & Clover Hill, and Brierfield West & Reedley.

739. Maintaining the existing configuration of constituencies in the south of Lancashire also resulted in less change to the South Ribble constituency than in the initial proposals. We proposed that the constituency should contain the two Chorley wards of Croston, Mawdesley & Euxton South, and Eccleston, Heskin & Charnock Richard, which are divided between the existing South Ribble and Chorley constituencies, subject to their realignment to reflect local government ward changes, as well as the wards currently within the constituency that are within South Ribble borough, along with the Farington East and Farington West wards. This configuration would allow the Ribble Valley constituency to include both the Walton-le-Dale East and Walton-le-Dale West wards within the same constituency, and would also mean both Bamber Bridge East and West wards would be united and included in the Ribble Valley constituency along with the Coupe Green & Gregson Lane ward, which also contains some of the settlement's urban extent.
740. Our Assistant Commissioners visited the Ribble Valley, Pendle, and Burnley area. They were persuaded by the representations, and their observations, which suggested that the Whalley and Clitheroe areas were similar in nature, sharing rural characteristics and good transport and communication links, and that the wards comprising the town of Whalley and the surrounding areas had little in common with Hyndburn. We therefore accepted their recommendations and proposed a Pendle and Clitheroe constituency that would contain the entirety of the Borough of Pendle, aside from the two Brierfield wards, and ten wards from the Ribble Valley, covering the Whalley and Clitheroe areas. The existing Ribble Valley constituency would therefore be significantly altered, and we acknowledged that the inclusion of Clitheroe and the Whalley area in Pendle and Clitheroe instead of a Ribble Valley constituency might not be popular with some residents. However, we believed that our proposals here went some way to address concerns expressed in representations from both Hyndburn and Whalley, that the two areas have little to nothing in common and that the Pendle and Clitheroe constituency would contain a large enough Ribble Valley element that there would be no question of the area being 'overlooked', as was argued in some representations.
741. We were mindful of the calls for the Rufford ward to be included within the West Lancashire constituency rather than the Southport constituency. Others suggested that all the wards that comprised the 'Northern Parishes' should be kept together in the same constituency, which we proposed should be the case with their inclusion in the Southport constituency. However, it remained our view that there is no suitable solution for the North West region without crossing the county boundary between Southport and the Borough of West Lancashire, although the existing Southport constituency can remain unchanged. We therefore made no further changes to the Southport and West Lancashire constituencies, and were not persuaded that the Southport constituency needed to be renamed.

### **Consultation on the revised proposals**

742. There continued to be opposition to the exclusion of the Dalston & Burgh ward from the Carlisle constituency, with further suggestions to include it at the expense of either the Brampton & Fellside ward or the Longtown & the Border ward. There was also a call to amend the name of the constituency to Carlisle and the Borders.
743. With regard to the revised Barrow and Furness constituency, some responses said that Eskdale and Ravenglass look north to Whitehaven not south towards Millom, and there were calls for the splitting of the Black Combe & Scafell ward along the existing parish boundary of Eskdale Parish to resolve this. There was also a call to rename this constituency South West Cumbria to reflect its new composition.
744. We received a large number of representations informing us that, by not including the Seaton & Northside ward in the revised Whitehaven and Workington constituency, the town of Workington was being effectively divided. A number of options to resolve this were proposed, including splitting the Seaton & Northside ward. There were suggestions that Keswick is intrinsically more linked to Penrith or Kendal than it is to Workington or Whitehaven, and calls to rename this constituency West Cumbria. The non-inclusion of the Seaton & Northside ward with the remainder of Workington was one of the largest single issues in the North West in the consultation on the revised proposals.
745. There were objections to the proposed Penrith and Solway constituency, which stretched east-west across Cumbria, with many highlighting this fact and issues relating to physical geography, lack of communities and poor transport connections within the proposed constituency. The Alston Moor ward was often cited as an issue, having limited or no connection to the rest of the constituency. Conversely, we received considerable support for our revised Westmorland and Lonsdale constituency, including from many who had objected to our initial proposals and who were of the view that we had 'got it right' this time.
746. As in previous consultation stages, the key opposition to our proposed cross-county Morecambe and Lunesdale constituency came from Cumbria, from where there were objections to the inclusion of wards – namely Arnside & Milnthorpe, Burton & Crooklands, and Sedbergh & Kirkby Lonsdale – in the constituency. We received a representation calling for the division of the Sedbergh & Kirkby Lonsdale ward, as well as calls for the ward to be retained within the Westmorland and Lonsdale constituency.
747. We received few representations on our revised proposals regarding the Lancaster and Wyre constituency, and there was support for the inclusion of the Skerton West and Skerton East wards together in that constituency. We had made no changes to the Blackpool North and Fleetwood, Blackpool South, and Fylde constituencies in our revised proposals. Although there remained some opposition to the inclusion of the Carleton ward in Blackpool North and Fleetwood, and a number of alternative names being proposed (although no groundswell of support for name changes), overall there were very few representations from any of these constituencies at revised proposals.
748. In Preston, there was some opposition to our exchanging of the Fishwick & Frenchwood, and Ribbleton wards with the Greyfriars and Sharoe Green wards, which comprise the Fulwood area

and which we included in the Ribble Valley constituency in our revised proposals, but there was also significant support.

749. In South Lancashire, we had made significant revisions to our initial proposals and in our revised proposals changed all the constituencies so that they were closer in configuration to the existing constituencies. Very few representations were received with regard to Blackburn, where the issue of the Blackburn South & Lower Darwen ward was one of the largest single issues in the North West at the initial proposals stage.
750. There was a mixture of opposition and support for the revised Burnley constituency. Among those representations in support, detailed evidence was provided of the strong community links between Brierfield and Burnley. However, there was also opposition, with calls for the Brierfield East & Clover Hill ward to be split. Regarding the Hyndburn, and Rossendale and Darwen constituencies, there was support for no change, apart from the realignment of the constituencies with local government ward boundary changes, but there was opposition to the revised constituencies. In the initial proposals, the case was put strongly that the Whalley areas had little in common with Hyndburn and should not be included in the Hyndburn constituency; in the revised proposals, it was claimed that these wards should be in the Ribble Valley constituency, or that they do have connections to Hyndburn and should be included in that constituency. There was also some opposition to the inclusion of the wards that comprise the town of Haslingden in the Hyndburn constituency, rather than in the Rossendale and Darwen constituency, although these wards are currently located in the existing Hyndburn constituency. There were also requests to rename the constituency Hyndburn and Haslingden. Similarly, with regard to the Ribble Valley, and Pendle and Clitheroe constituencies there was both considerable opposition and support with strong evidence and arguments made on both sides. Although a number of representations objecting made reference to the administrative town of the Borough of Ribble Valley – Clitheroe – being in the Pendle and Clitheroe constituency in our revised proposals, others, for example, highlighted the links of Clitheroe and Whalley with the communities of Barley and Colne, which are in the existing Pendle constituency.
751. In the revised proposals, we changed the initial proposals for the Chorley constituency, so that it would be the same as the existing constituency, apart from a realignment with local government ward boundary changes. This was well received in the Adlington & Anderton, and Chorley North East wards, and equally very poorly received in the large rural wards of Croston, Mawdesley & Euxton South, and Eccleston, Heskin & Charnock Richard, where there was considerable opposition to the inclusion of these wards in the South Ribble constituency. These wards have been modified following a local government boundary review. In the initial proposals these two wards had been wholly included in the Chorley constituency, although significant areas of both wards are currently located in the South Ribble constituency.
752. We were mindful of the calls for the Rufford ward to be included within the West Lancashire constituency rather than the Southport constituency and that others supported that the ‘Northern Parishes’ wards should be kept together in the same constituency. Very few representations were received otherwise with regard to the West Lancashire constituency, which had remained unchanged throughout the consultation stages.



## Final recommendations

753. Our revised proposals for Cumbria had attracted both support, particularly for the Westmorland and Lonsdale constituency, and opposition, primarily to our proposed Penrith and Solway constituency. We had acknowledged previously that we had considered that there were, in effect, only two solutions for the constituencies in Cumbria, and we had to decide which of these seemingly mutually exclusive approaches to take across Cumbria (aside from Carlisle). We had agreed with our Assistant Commissioners, who visited the county, that these two main options would have to be based on a very difficult choice between different competing statutory factors. We significantly altered our initial proposals and considered that these represented the best solution for these two constituencies.
754. Elsewhere in Cumbria, we did not consider there were sufficient reasons to alter the proposed Carlisle constituency, or to rename it Carlisle and the Borders, as every ward in the constituency was a City of Carlisle ward.
755. In the south-west of the county, we had split the Broughton & Coniston ward along the boundary between the existing Barrow and Furness constituency, and the existing Westmorland and Lonsdale constituency, thereby retaining an existing constituency boundary, which was required for the revised proposals to be adopted. However, although it would be possible to split the Black Combe & Scafell ward without large scale knock-on effects, or to alter the Barrow and Furness constituency we had proposed, we did not consider that the underlying evidence and reasons for dividing this ward were sufficiently strong to meet the threshold for splitting wards as previously set out, especially as there would not be significant benefits generally to the constituencies in this area.
756. On a similar basis, we do not consider that there are sufficiently strong grounds to split the Seaton & Northside ward. However, we acknowledge that our revised proposals here do separate Seaton from the rest of Workington and effectively divide the port between constituencies. We therefore recommend the inclusion of both the Seaton & Northside, and Flimby wards in the proposed Whitehaven and Workington constituency. This entails the exchange of other wards to ensure all constituencies are within the permitted electorate range. We noted representations that said that Keswick should be included in the Penrith and Solway constituency instead, and that, although Keswick had been included in the same constituency as Workington in the past and there were inevitably links with the town, Keswick also had links with Penrith. However, we noted and agreed with a representation that said the Keswick ward was also intrinsically linked to the neighbouring Crummock & Derwent Valley ward, and that, if the Keswick ward were to be included in another constituency, so should Crummock & Derwent Valley; this would allow for the Seaton & Northside, and Flimby wards to be included in the Whitehaven and Workington constituency. As there was no body of evidence that suggested that either Crummock & Derwent Valley, or Keswick looked south toward the Westmorland and Copeland constituency, we considered the inclusion of both wards in Penrith and Solway, and of Seaton & Northside, and Flimby in Whitehaven and Workington, to be an improvement on the revised proposals and would also include all these areas in the new unitary authority that is scheduled to be implemented in this part of Cumbria. We accordingly have included these changes as part of our final recommendations. However, we were not persuaded to rename the Whitehaven and Workington constituency West Cumbria.

757. We noted the opposition and counter proposals to the cross-county boundary Morecambe and Lunesdale constituency, particularly concerning the Sedbergh & Kirkby Lonsdale ward and that there had been calls for the ward to be divided, with the larger part retained in the Westmorland and Lonsdale constituency. However, we considered that this would leave other parts of the ward detached from the rest of the ward and that the River Lune extended well into the Sedbergh & Kirkby Lonsdale ward.
758. In Lancashire, we considered that there had been sufficient support and no new or significant evidence to persuade us to change the Morecambe and Lunesdale, Lancaster and Wyre, Blackpool North and Fleetwood, Blackpool South, and Fylde constituencies. We acknowledge the large body of representations received about the inclusion of the Croston, Mawdesley & Euxton South, and the Eccleston, Heskin & Charnock Richard wards in the South Ribble constituency, but have not been persuaded to amend our revised proposals, not least as large parts of these wards are already in the existing South Ribble constituency. We therefore recommend no further change to our proposed South Ribble and Chorley constituencies with respect to these two wards, as it allows a configuration of constituencies across south Lancashire that closely matches the existing configuration.
759. The configuration of the following constituencies in our revised proposals were largely the same as the existing constituencies: Preston; Blackburn; Hyndburn; Rossendale and Darwen; and Burnley. We did not consider that a sufficiently strong case had been made to split the Brierfield East & Clover Hill ward. Although there were calls for some areas of the Borough of Ribble Valley to be included with Hyndburn in the revised proposals, we had altered our initial proposals due to the significant amount of opposition received. We do not consider there are sufficient grounds to alter our revised proposals for either the Ribble Valley, or Hyndburn (which would be unchanged from the existing constituency) constituencies. We note the representations from Haslingden opposed to the inclusion of the town in the Hyndburn constituency instead of in Rossendale and Darwen, but this is the existing arrangement. Furthermore, as the Hyndburn constituency would be unchanged from the existing constituency, we do not recommend that its name be changed to include reference to the town of Haslingden.
760. There continued to be opposition to our proposed Ribble Valley, and Pendle and Clitheroe constituencies, although there was some support, particularly from the proposed Pendle and Clitheroe constituency. We acknowledge that the inclusion of the town of Clitheroe and the Whalley area in Pendle and Clitheroe, instead of a Ribble Valley constituency, is not popular with some residents and noted the alternative suggestions that had been made. However, we consider that there had to be change in this area, and, although both constituencies are significantly reconfigured, we judge that our revised Ribble Valley, and Pendle and Clitheroe constituencies both better meet the statutory factors for the whole of Lancashire than did our initial proposals or the alternatives that have been suggested. We also consider the inclusion of both the Walton-le-Dale East and Walton-le-Dale West wards, and also both Bamber Bridge East and West wards in the Ribble Valley constituency, along with the Coupe Green & Gregson Lane ward, to be a positive outcome for these wards.
761. We noted the calls for the Rufford ward to be included within the West Lancashire constituency rather than the Southport constituency and that the wards of Hesketh-with-Beaconsall, North Meols, Rufford, and Tarleton, should be kept together. Very few representations were otherwise received with regard to the West Lancashire constituency, which had remained unchanged

throughout the consultation, and we were not persuaded to make any changes to our revised proposals.

762. Our final recommendations for Cumbria and Lancashire are therefore for constituencies of: Barrow and Furness; Blackburn; Blackpool North and Fleetwood; Blackpool South; Burnley; Carlisle; Chorley; Fylde; Hyndburn; Lancaster and Wyre; Morecambe and Lunesdale; Pendle and Clitheroe; Penrith and Solway; Preston; Ribble Valley; Rossendale and Darwen; South Ribble; West Lancashire; Westmorland and Lonsdale; and Whitehaven and Workington. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## **Merseyside and Cheshire**

### **Initial proposals**

763. As a consequence of our proposals for the Southport constituency, the existing Sefton Central constituency, which could be left wholly unchanged, was subject to minor change in our initial proposals. The proposed Sefton Central constituency included the Ainsdale ward from the existing Southport constituency, and no longer included the Molyneux ward, which we included in our proposed Liverpool Norris Green constituency. The Bootle constituency was wholly unchanged.
764. In the City of Liverpool, all the wards have large electorates and we had to propose fairly significant changes in order to formulate constituencies which were within the permitted electorate range. Although it still contained the Walton area, we proposed that the existing Liverpool Walton constituency be largely reconfigured and would no longer contain the Everton or Anfield wards, and would include the Croxteth and Norris Green wards. We also proposed that it would include the Molyneux ward from the Borough of Sefton. We acknowledged that this ward is largely rural in nature, but we considered that there were no reasonable alternatives in view of the other constituencies we proposed on Merseyside. We also proposed that this constituency be called Liverpool Norris Green.
765. Our proposed Liverpool Riverside constituency largely followed the form of the existing constituency, but was more centred to the west. It included both the Everton and Anfield wards, but no longer the existing constituency's three south-eastern wards of Greenbank, Mossley Hill, and St. Michael's, which were included in the proposed Liverpool Wavertree constituency. This constituency remained centred on Wavertree, but, in order to return the constituency to within the permitted electorate range, we no longer included the Church or Old Swan wards in the constituency. The Church ward was included in our proposed Liverpool Garston constituency. This constituency was also wholly contained within the City of Liverpool authority, as it no longer extended into the Halewood area of the Borough of Knowsley.
766. Our proposed Liverpool West Derby constituency included the Old Swan ward, and no longer included the Norris Green or Croxteth wards. It extended into the Borough of Knowsley, incorporating the wards of Page Moss and Swanside. As the City of Liverpool cannot be allocated a whole number of constituencies entirely within its boundaries, one constituency must cross into the Borough of Knowsley. We considered that this was the best location for the crossing, resulting in a compact constituency with an urban character and community links. With the exception

of the two Knowsley council wards mentioned previously being included in the Liverpool West Derby constituency, and the realignment of the constituency boundary in the south to match local government ward changes, our proposed Knowsley constituency was otherwise unaltered.

767. Although the St Helens North constituency could remain unchanged, we proposed modifying it slightly in order to account for required changes in the existing St Helens South and Whiston constituency, which has an electorate larger than the permitted range. As such, our proposed St Helens North constituency no longer included the Parr ward, but did include the Town Centre ward. Our proposed St Helens South constituency included all the remaining wards within the Borough of St Helens, and also the Prescott South ward from the Borough of Knowsley. Although this would be an orphan ward, it is currently part of the existing St Helens South and Whiston constituency. We considered various configurations of constituencies in this and the surrounding area, but judged these would be more disruptive and not best reflect the statutory factors.
768. We proposed using the natural physical boundary of the River Mersey to divide the Borough of Halton between constituencies. The northern wards of Halton, including all of the town of Widnes on the northern bank of the river, would form most of a constituency that extended north across the ceremonial county boundary of Cheshire to include the three wards of Halewood North, Halewood South, and Whiston & Cronton from the Borough of Knowsley. We considered that this proposed Widnes and Halewood constituency resulted in less change across Liverpool and Knowsley than the alternatives. Similarly, it allowed for very minor changes in the boroughs of St Helens and Warrington. We acknowledged that Whiston would therefore be divided between two constituencies, and that this was not an ideal solution, but we considered that there was no reasonable alternative.
769. On the southern bank of the River Mersey, the town of Runcorn formed the largest urban area of our proposed Runcorn and Helsby constituency. This constituency contained all the wards of the Borough of Halton that are south of the River Mersey, and extended west into the Cheshire West and Chester unitary authority, to contain the four wards of Frodsham, Helsby, Gowy Rural, and Sandstone from that authority. We considered that having the entirety of Widnes and Runcorn in separate constituencies resulted in a practicable configuration and distribution of constituencies across Cheshire and Merseyside.
770. The proposed Warrington North constituency was unchanged from the existing constituency, except to realign the constituency boundary with local government ward changes. The existing Warrington South constituency had an electorate considerably over the permitted range. We therefore proposed a Warrington South constituency which no longer included the Lymm North & Thelwall, or Lymm South wards. These two wards, which constitute the entire town of Lymm, were transferred to the Tatton constituency, along with the Dane Valley ward from the Cheshire East unitary authority. The inclusion of these wards meant that no wards from the Cheshire West and Chester unitary authority would be included within a Tatton constituency.
771. We proposed that a new constituency be constructed, which would be centred around, and named, Northwich, and would be wholly contained within the Cheshire West and Chester unitary authority, and would arguably be a successor to the existing Weaver Vale constituency, although significantly reconfigured.

772. The configuration proposed for the Northwich and Tatton constituencies resulted in minor changes within the rest of the Cheshire East unitary authority. The Macclesfield constituency was wholly unchanged, and our proposed Congleton constituency was also very similar to the existing configuration. The latter no longer included the Dane Valley ward, but aside from that was unchanged, except to realign the constituency boundary with local government ward changes. Our proposed Crewe and Nantwich constituency was also only changed by just one ward, except for realignment with local government ward changes: it no longer included the Wybunbury ward.
773. The existing Eddisbury constituency was significantly reconfigured under our proposals. The town of Winsford was mostly transferred to the Northwich constituency and the constituency no longer extended so far north towards the River Mersey, as that area was now within our proposed Runcorn and Helsby constituency. Conversely, it included the Wybunbury ward from Crewe and Nantwich as well as wards from the south of Chester. As the changes to the existing Eddisbury constituency had been significant, we named this constituency South Cheshire, which we considered to be more reflective of the nature and geographical extent of the constituency.
774. The five wards which constitute the northern portion of the City of Chester were included in a constituency with the Saughall & Mollington, and Willaston & Thornton wards, as well as the three wards which comprise the town of Neston. We considered the most accurate name for this constituency to be Chester North and Neston. Although we sought not to divide Chester, the River Dee does form a clear geographic boundary between constituencies and the difficulties caused by not dividing the City of Chester are considerable, with knock-on effects throughout both Cheshire West and Chester, and the Wirral. We therefore included the wards of Handbridge Park and Lache in our proposed South Cheshire constituency. A key reason for these changes is that there cannot be a whole number of constituencies that are contained within the boundary of the Borough of Wirral. Although there are currently four whole constituencies, the Wirral now only has the electorate for an allocation of three whole constituencies, and one part constituency. As we did not wish to propose a constituency which spanned the River Mersey between the Wirral and the City of Liverpool, it was necessary for a constituency to extend into the Cheshire West and Chester unitary authority. We proposed that this cross-county boundary constituency be centred around Ellesmere Port, which, as it would no longer incorporate Neston, or the Gowry Rural ward, would now extend along the southern bank of the River Mersey, and would include the Eastham and Bromborough wards from the existing Wirral South constituency. To take account of these changes, our proposed constituency was simply called Ellesmere Port.
775. Our proposals for the remainder of the Wirral sought to minimise changes wherever possible. To achieve this we divided the Upton ward along the boundary of the A5027, with the northern half of this ward, consisting of the Upton community, included within our proposed Wallasey constituency, the remainder of which was unchanged. The southern half of this ward, containing the Woodchurch community, would continue to be included in the Wirral West constituency, which also gained the Heswall and Clatterbridge wards. Our proposed Birkenhead constituency was changed only by the inclusion of the Bebington ward. We considered that the benefits provided by dividing the Upton ward considerably outweighed the disadvantages of not doing so. It enabled us to retain with minimal change three of the existing four constituencies on the Wirral, and all alternative configurations of constituencies within this area that we examined paid far less heed to local and community ties.

### Consultation on the initial proposals

776. We received a large number of representations in opposition to the inclusion of the Ainsdale ward in the Sefton Central constituency, with detailed evidence provided that this ward should be included with Southport. Some of these representations highlighted that both the Southport and Sefton Central constituencies are within the permitted electorate range and therefore do not need to change. However, crossing the county boundary between Southport and Lancashire was supported and it was generally acknowledged that this county boundary crossing would enable a pattern of constituencies across much of the North West that would result in less disruption overall and better reflect the statutory factors than a pattern based on no such crossing.
777. A very large number of representations were received with regard to the Liverpool Norris Green constituency, with overwhelming opposition to the proposed name in particular. Many representations highlighted the importance of Walton to the local community and the fact that Walton is a historic town, pre-dating Liverpool. The other key issue in this constituency concerned the Molyneux ward. This would be an orphan ward from the Borough of Sefton. It was stated that its inclusion within the Liverpool Norris Green constituency would not only arbitrarily divide the town of Maghull, but add an unrepresentative rural spur to an otherwise urban Liverpool constituency. Some respondents proposed that splitting the ward along the prominent boundary of the M57 north of Aintree would resolve this issue.
778. The remaining constituencies in Liverpool generated relatively few representations and were largely supported, although there was some opposition, with counter proposals submitted for alternative configurations of constituencies in Liverpool. Our proposed configuration for the Liverpool Wavertree constituency was largely supported. There was opposition to our proposed Liverpool West Derby constituency from those who objected to the inclusion of the Borough of Knowsley wards of Page Moss and Swanside. It was stated that Huyton (covered by these latter wards) was fundamentally a part of Knowsley, not Liverpool, although others were unable to identify an alternative solution. The proposed Liverpool Riverside constituency elicited relatively few representations, and, although a counter proposal was received, the implications of it on surrounding constituencies was not addressed,
779. Very few representations were received regarding the Bootle constituency, although among the representations the issue of the town of Crosby being divided between constituencies was raised. Although a counter proposal had merit, adopting it would not only require further splitting of wards where proposed constituencies were broadly uncontroversial, it would also alter the otherwise unchanged Bootle constituency. Representations were also received calling for the reunification of the Croxteth and West Derby wards within the same constituency, to avoid the division of Croxteth Hall and Country Park.
780. There was opposition to the initial proposals in St Helens, particularly with regard to the Town Centre ward. Evidence was provided that the Town Centre ward was 'the historical and civic centre of the original St Helens town, most of which is now found in St Helens South' and that St Helens North comprises many other towns and urban areas. A counter proposal returned the Town Centre and Parr wards to their existing constituencies and resulted in the St Helens North constituency being entirely unchanged from its existing configuration. In order to bring the St Helens South constituency within the permitted electorate range, polling district WC5 from the Whiston & Cronton ward would also be included in the constituency. The split of this ward would

follow the Liverpool to Manchester railway line, a recognisable physical feature that the counter proposal stated has been used 13 times as a ward or polling district boundary in the Knowsley Council area.

781. The use of the River Mersey to bisect the Borough of Halton and create two constituencies centred on Widnes and Runcorn respectively was broadly well received. The representations highlighted that Halewood had a strong historic association with Widnes, although a number of representations from Halewood argued the opposite case.
782. The configuration of our proposed Runcorn and Helsby constituency was broadly supported, but a counter proposal for constituencies elsewhere in Cheshire proposed six split wards (Christleton & Huntington; Goway Rural; Handbridge Park; Marbury; Sandstone; and Willaston & Thornton) some of which would affect the Runcorn and Helsby constituency. Alternative names were requested (Runcorn and Weaver; Runcorn; Frodsham and Helsby; or North West Cheshire), while others called for a neutral name to be used, and referred to the Sandstone Ridge that was located in the constituency. There were also calls for the village of Sutton Weaver, in the Marbury ward, to be included in the same constituency as Runcorn, citing both geographic proximity and community links.
783. We received few representations regarding the Warrington North constituency, but we received objections to our proposals for Warrington South and Tatton (although there was also appreciable support). Evidence was provided that Thelwall is an integral part of central Warrington, and has limited connections or community ties with Lymm, despite parts being in the same ward, and that the Lymm North & Thelwall ward should be split in order to retain more electors in their existing constituency, and avoid the division of the Thelwall community.
784. The initial proposals for a Northwich constituency garnered significant support, in particular for the inclusion of the Davenham, Moulton & Kingsmead ward, and the Weaver & Cuddington ward in the constituency. However, we received a large number of representations in opposition to the division of the town of Winsford, as, of the five named Winsford wards, only four would be included, with the Winsford Over & Verdin ward included in the proposed South Cheshire constituency instead. Conversely, as the ward contains not just part of the urban extent of Winsford, but also a large rural component, some representations agreed that the ward should not be included with the more urban centred Northwich constituency. There were also objections from residents of Allostock in the Shakerley ward, who felt that the M6 was a natural boundary between themselves and Northwich, and that they looked northwards to Knutsford instead. We received a counter proposal that exchanged the Winsford Over & Verdin ward for the Weaver & Cuddington ward. Other representations highlighted in detail the community ties in central Cheshire, and proposed an alternative configuration of constituencies to unite the three Mid Cheshire towns of Northwich, Middlewich and Winsford within one constituency, contending that Middlewich's presence in Cheshire East was anomalous.
785. Elsewhere in Cheshire, the proposed Macclesfield constituency, which was entirely unchanged, was strongly supported. We received a significant number of representations stating that the Wybunbury ward should be included within the Crewe and Nantwich constituency, with the Leighton ward transferred to South Cheshire instead. There was, however, also limited support for the initial proposals, with others proposing splits of the Haslingden ward, and both the Bunbury and Wrenbury wards, to accommodate new housing developments in Nantwich.

786. The initial proposal to not include the Lache and Handbridge Park wards in the same constituency as the remainder of Chester was overwhelmingly opposed. Although the River Dee is a clear geographic boundary, residents feel it does not reflect any true divide in the local community. Despite the near unanimous opposition, however, it was broadly accepted by some that there was no better solution that would support a cohesive scheme of constituencies in the wider area. One counter proposal, as previously mentioned, suggested splitting six wards to maintain the existing City of Chester constituency. One counter proposal called for the splitting of the Gowry Rural ward alone to retain Mickle Trafford with Chester. It was also requested that South Cheshire be renamed Chester South and Eddisbury.
787. The proposal to split the Upton ward between the Wallasey and Wirral West constituencies, although supported by some respondents, was strongly opposed in over 100 representations. These included a detailed counter proposal arguing for a split of the Moreton West and Saughall Massie ward instead. Apart from the representations with respect to the Upton ward, we received relatively few representations with regard to the Wallasey, Wirral West, and Birkenhead constituencies. The proposed Ellesmere Port constituency did not elicit a large number of representations, and, although there was some support, there was also a counter proposal that would split the Willaston & Thornton ward to retain Little Sutton in the Ellesmere Port constituency.

### Revised proposals

788. In respect of the Liverpool Norris Green constituency, on the recommendation of our Assistant Commissioners, we restored the name Liverpool Walton, having found the evidence provided particularly persuasive and helpful in understanding the importance of Walton to the local community, and the history of Liverpool as a whole. We also considered that proposals to split the ward of Molyneux had some merit. Our Assistant Commissioners visited the ward and found it to be extensive, containing both urban and rural elements, and small segments of the town of Maghull, with the M57 forming a large and recognisable physical boundary between the rural area to the north, and urban Aintree to the south. We also noted that – unlike Aintree – Maghull has never been associated in a constituency with Liverpool. We were mindful that splitting the ward would result in ‘orphan’ polling districts from Sefton being included in an otherwise Liverpool constituency, but we acknowledged that following the existing ward boundaries in this area under the initial proposals would divide the town of Maghull, and thus likely break community ties there. Although the split of the ward would not result in extensive wider benefits elsewhere in Merseyside, we considered that, in this instance, it would enable greater adherence to the statutory factors overall, and result in a better configuration for both constituencies involved. We did, however, note that the Waddicar area appeared to be an unusual inclusion in the Molyneux ward, seeming to be separate from both Sefton and Aintree, and instead forms a continuous built-up area with the Kirkby area of Knowsley. We particularly welcomed further views on this from local residents in the consultation on our revised proposals. We proposed that the Molyneux ward be split, with polling districts C4, C5, and C6, covering Aintree, being included in the Liverpool Walton constituency, with the boundary here following the River Alt, as opposed to the motorway. The remainder of the ward was included in the Sefton Central constituency, where the whole ward is currently located.
789. Although the issue of the town of Crosby being divided between constituencies was raised, the Bootle constituency had been unchanged in our initial proposals, and we decided to make



no further changes. There were also some calls for the ‘reunification’ of the Croxteth and West Derby wards within the same constituency, to avoid the division of Croxteth Hall and Country Park. However, we did not consider it was essential for the park to be contained within a single constituency

790. Apart from the revised proposals for the Liverpool Walton constituency, we considered that there was no persuasive evidence to amend any of the other constituencies in the City of Liverpool.
791. Our Assistant Commissioners visited St Helens and considered that the counter proposal that returned the Town Centre and Parr wards to their existing constituencies and resulted in the St Helens North constituency being entirely unchanged from its existing configuration had considerable merit, and, in order to bring the St Helens South constituency within the permitted range, polling district WC5 from the Whiston & Cronton ward would also be included in the constituency. We agreed with our Assistant Commissioners that the counter proposal would result in less disruption than the initial proposals and amended both the St Helens North, and St Helens South and Whiston constituencies as described. Our revised proposal for the two St Helens constituencies had an impact on the Widnes and Halewood constituency, insofar as polling district WC5 of the Whiston & Cronton ward would no longer be included in the constituency. In view of the relatively few representations, we proposed no further changes to the Widnes and Halewood constituency.
792. The proposed Runcorn and Helsby constituency was broadly supported. Some representations highlighted that the village of Sutton Weaver, in the Marbury ward, would fall outside of this proposed constituency and called for this area to be included in the same constituency as Runcorn, citing both geographic proximity and community links. This would involve the splitting of the Marbury ward and, while we considered that this had some merit, we considered that doing so would not provide sufficient benefits to either of the proposed constituencies. A number of alternative names were suggested, but we considered there were insufficient grounds to amend either the configuration or name of the Runcorn and Helsby constituency as initially proposed, and made no changes.
793. Very few representations were received regarding the Warrington North constituency, largely due to the lack of change, and we therefore proposed no changes to the constituency. Following their visit to the area, our Assistant Commissioners considered that the counter proposal to split the Lymm North & Thelwall ward had merit, as they considered that Thelwall was an intrinsic part of central Warrington, separated from the rural market town of Lymm by empty land and the M6 motorway. They also considered that the initial proposals here would break community ties in the area. We agreed with their assessment and therefore revised the initial proposals and adopted the proposal to split the ward, with four polling districts which align with the boundaries of Grappenhall and Thelwall Parish – SNC, SND, SNE, SNF – remaining within the Warrington South constituency. The remainder of the Lymm North & Thelwall ward, comprising Lymm, would be included in the Tatton constituency. This would also allow for the Marbury and Shakerley wards to be included in the Tatton constituency, which would then be the same as the existing constituency, except for the addition of the town of Lymm, and realignment of the Tatton constituency with changes to local government ward boundaries. It would also address the concerns of the residents of Allostock over their links with Knutsford, without requiring another ward split. We therefore revised our initial proposals and split the Lymm North & Thelwall ward.

794. In respect of our proposed Northwich constituency, we considered that a counter proposal to include the Winsford Over & Verdin ward, originally included in the proposed South Cheshire constituency, in exchange for the Weaver & Cuddington ward, had considerable merit, as did the representations proposing that the three key mid-Cheshire towns of Northwich, Middlewich and Winsford should be contained within the same constituency. Although Middlewich would be an orphan ward, this would enable the Dane Valley ward to be returned to the Congleton constituency. We therefore amended our initial proposals for the configuration of the Northwich constituency, which we renamed Mid Cheshire, and made consequential changes to the configuration of the Tatton and Congleton constituencies.
795. Our proposed Macclesfield constituency, which was entirely unchanged under the initial proposals, attracted a great deal of support, and we proposed that there be no change.
796. We considered the representations that suggested that the Leighton and Wybunbury wards should be exchanged between the South Cheshire, and Crewe and Nantwich constituencies. Our Assistant Commissioners visited the two wards; they observed that Leighton is clearly an extension of the urban area of Crewe and that Wybunbury is a large rural ward and, although they acknowledged the evidence that had been presented of the links of the Wybunbury ward with Crewe (not least in relation to the development of HS2), they were overall not persuaded that the counter proposal to exchange the wards would be a better alternative. Similarly, they considered that splitting either the Bunbury or Wrenbury wards to include all new elements of Nantwich within the constituency would not be sufficiently beneficial. We agreed and proposed no changes to the Crewe and Nantwich constituency as initially proposed.
797. Our initial proposals for Chester were overwhelmingly and strongly opposed. However, although we had no doubt that the Lache and Handbridge Park wards looked to and were part of Chester, we considered that a better alternative to our initial proposals had not been forthcoming, and noted some local representations that, while not actively supporting the proposals, had reluctantly accepted that there was no better solution that would support a cohesive scheme of constituencies in the wider area. We did not consider the counter proposals that split multiple wards in order to retain a constituency centred on the City of Chester had merit. We therefore proposed no further changes to the proposed Chester North and Neston constituency. However, we did accept the argument that the South Cheshire constituency be renamed Chester South and Eddisbury; the change of name would better reflect the inclusion of the Lache and Handbridge Park wards from Chester, and, in having a Chester North constituency it would be sensible to also have a constituency named Chester South. Furthermore, the constituency would also include significant areas from the existing Eddisbury constituency. We therefore proposed this name change as part of our revised proposals.
798. Our proposals for the Wirral had sought to minimise change to the existing pattern of constituencies. We noted the broad level of support for our proposed constituencies, and also the opposition to the proposed split of the Upton ward, and the detailed counter proposal, arguing for a split of the Moreton West and Saughall Massie ward instead. However, we considered that the constituencies resulting from the counter proposal would be unnecessarily disruptive to the existing configuration of constituencies on the Wirral, and we therefore proposed no further changes to the Birkenhead, Wallasey, and Wirral West constituencies, but we did rename the Ellesmere Port constituency as Ellesmere Port and Bromborough, to recognise the presence of that community in the constituency.

### **Consultation on the revised proposals**

799. There was continued opposition to the Southport and Sefton Central configurations, on both the grounds of the extension across the county boundary, and the fact Ainsdale remained outside the constituency. However, no new compelling evidence, or viable counter proposals were received. There were further calls to rename Southport as Southport and Douglas.
800. In our revised proposals report, we requested responses concerning the split of the Molyneux ward, seeking views as to whether to leave it as in the revised proposals, or also include polling district C2 as well, which covers Waddicar. The only representation received was in favour of the boundaries we proposed in our revised proposals. Almost no representations were received with regard to the Bootle constituency, aside from those opposing the composition of the existing constituency.
801. In Liverpool we received few representations commenting on the configuration of constituencies. However, we did receive some representations commenting on the proposed constituency names. There were calls to rename Liverpool Garston as Liverpool South, and an assertion that Wavertree itself is not in the proposed Liverpool Wavertree constituency. Aside from these there have been very few representations across the entire area.
802. Aside from requests to use new local government ward boundaries in St Helens, we received very few representations on the proposed St Helens, and Widnes and Halewood constituencies.
803. We received relatively few representations in regards to the two Warrington constituencies, although there was still some opposition to the removal of some part of Warrington South from the constituency in order to bring it within the permitted electorate range.
804. We received support for the new Mid Cheshire constituency, although there were also some requests, but no groundswell of support, to change the constituency name to Northwich and Winsford. There was both support and opposition to the splitting of the Lymm North & Thelwall ward between the Warrington South and Tatton constituencies. The Tatton constituency was largely supported, and the few representations we received regarding our proposed Runcorn and Helsby constituency were mainly continued requests to change its name.
805. There was support for the proposed Crewe and Nantwich, Congleton, and Macclesfield constituencies. There remained some requests for the Wybunbury ward to be exchanged with the Leighton ward and included in Crewe and Nantwich, or for the Leighton ward to be split between constituencies, but no new evidence was presented and the number of representations were now relatively few in number.
806. Although we received some support for our approach – including evidence against the splitting of multiple wards to create a single Chester constituency (as had been suggested in previous consultation stages) – we continued to receive strong opposition against the division of Chester and the inclusion of rural wards with the urban element of the Chester North and Neston constituency, as well as the inclusion of Chester wards in the largely rural Chester South and Eddisbury constituency. There were also requests for further name changes, including removing Eddisbury from the name entirely and for the constituency to be merely South Cheshire or South West Cheshire.

807. There was support for our approach on the Wirral and for all four constituencies of Birkenhead, Ellesmere Port and Bromborough, Wallasey, and Wirral West, but there was still opposition from the Upton ward to the splitting of the ward between the Wallasey and Wirral West constituencies. Some representations had focused on the crossing onto the Wirral, and the fact that Little Sutton remained divided between the Ellesmere Port and Bromborough, and Chester North and Neston constituencies. There were also requests for name changes on the Wirral, with proposals that Birkenhead be renamed Wirral East and Wirral West renamed Wirral Deeside.

### **Final recommendations**

808. On Merseyside we do not consider that there has been a significant level of opposition to our revised proposals, nor any significant or new evidence. We note the calls for the cross-county boundary constituency of Southport to be renamed Southport and Douglas, but do not consider that this change of name is either suitable or required, as we considered that reference to Douglas would mean little to anyone other than to those living in the immediate area. Few further representations were received with regard to the split of the Molyneux ward, the Sefton Central and Bootle constituencies, and we recommend no changes to our revised proposals.
809. In the areas of Liverpool and Knowsley, there have been few further representations commenting on the pattern of constituencies. We noted the suggestion to rename Liverpool Garston as Liverpool South, but considered this would not better reflect the area covered by the constituency, and that Garston forms part of an existing constituency name.
810. We received few representations regarding the two St Helens, two Warrington constituencies, or Widnes and Halewood.
811. Within the remaining areas of Cheshire, no significant further opposition or new evidence was presented. There appeared to be no consensus on an alternative name for the proposed Runcorn and Helsby constituency, and we therefore do not recommend that there be any change to the constituency as in our proposals.
812. Although there was still very significant opposition to our proposed Chester and North Neston, and Chester South and Eddisbury constituencies, there was also an acceptance, albeit reluctant, that there was no other solution that did not either cause serious disruption across the whole area or require splitting multiple wards.
813. There was support for the four constituencies on Wirral, despite some continued opposition to the division of the Upton ward, but we consider that an alternative split ward here would be more disruptive to the existing pattern of constituencies. We also noted opposition to Little Sutton being divided between the Ellesmere Port and Bromborough, and Chester North and Neston constituencies. However, we do not consider that an alternative proposal here would offer a better solution. We are not persuaded of the case to change the names of our proposed Birkenhead and Wirral West constituencies.
814. Our final recommendations for Merseyside and Cheshire are therefore for the constituencies of: Birkenhead; Bootle; Chester North and Neston; Chester South and Eddisbury; Congleton; Crewe and Nantwich; Ellesmere Port and Bromborough; Knowsley; Liverpool Garston; Liverpool Riverside; Liverpool Walton; Liverpool Wavertree; Liverpool West Derby; Macclesfield; Mid Cheshire; Runcorn and Helsby; Sefton Central; Southport; St Helens North; St Helens South and

Whiston; Tatton; Wallasey; Warrington North; Warrington South; Widnes and Halewood; and Wirral West. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## Greater Manchester

### Initial proposals

815. The metropolitan area of Greater Manchester has a mathematical entitlement to 27 constituencies. Of the existing constituencies, 14 are within the permitted electorate range, seven are below, and six are above. The initial proposals left seven of the existing 27 constituencies wholly unchanged.
816. Our proposed Stockport constituency included the Reddish North and Reddish South wards. The Manor ward, which was formerly within the Stockport constituency was included within the proposed Hazel Grove constituency, which was otherwise unchanged. The existing Cheadle constituency was wholly unchanged. This configuration resulted in three constituencies contained wholly within the boundaries of the Borough of Stockport.
817. We proposed that the two existing Borough of Trafford constituencies – Stretford and Urmston, and Altrincham and Sale West – would remain wholly unchanged. The existing Wythenshawe and Sale East constituency, spanning the boundaries of Trafford and the City of Manchester, would also remain wholly unchanged. Although the existing Manchester Withington constituency could remain wholly unchanged, because there have been local government ward changes in this area, to do so would mean having to divide a number of these new wards. We therefore changed the constituency only to realign it with these new wards. The existing Manchester Gorton constituency has been similarly subjected to local government ward changes, and as a result no longer included the Gorton & Abbey Hey ward in our proposals. We therefore proposed that the revised constituency be called Manchester Longsight.
818. We were able to consider the four geographically contiguous boroughs of the City of Salford, Wigan, Bolton, and Bury as a group with an allocation of ten constituencies, thereby allowing us to retain the distinction between the cities of Salford and Manchester, and to largely maintain the existing distribution and configuration of constituencies within these four boroughs.
819. Our proposed Salford constituency remained wholly within the City of Salford local authority and included the Broughton ward, which, although to the east of the River Irwell, and within the existing Blackley and Broughton constituency, is a ward of the City of Salford local authority. The Eccles, and Swinton & Wardley wards were included within our proposed Worsley and Eccles constituency, as was the Astley Mosley Common ward, from the Borough of Wigan – the only ward from Wigan that was included within a Salford-based constituency. Within the Borough of Wigan, we proposed that the existing Wigan constituency be wholly unchanged. The existing Makerfield constituency could have remained unchanged, but was modified due to changes to the existing Leigh constituency, which has an electorate over the permitted range. The Makerfield constituency was amended to include the Leigh West ward in exchange for the Ashton ward, which was included in our proposed Leigh South and Atherton constituency, which would include the Atherton ward. We acknowledged that the inclusion of the Leigh West ward in a Makerfield constituency, and the Ashton ward in the Leigh South and Atherton constituency, meant that

the towns of both Leigh and Ashton-in-Makerfield would be divided between constituencies. However, we considered that some division of communities in this area was unavoidable.

820. Our proposed Bolton West constituency was largely unchanged, but included the Hulton ward to bring it within the permitted electorate range, as the Atherton ward would no longer be included, and would be wholly contained within the Borough of Bolton. The proposed Bolton North East constituency differed from the existing constituency only by the inclusion of the Little Lever and Darcy Lever ward. As the Bolton South constituency would no longer include the Little Lever and Darcy Lever, or Hulton wards, we included the Salford wards of Walkden North, Walkden South, and Little Hulton, in order to bring it within the permitted electorate range; this also enabled us to keep the town of Walkden in one constituency. We proposed naming this constituency Bolton South and Walkden.
821. The electorate of the existing Bury North constituency is below the permitted range. We therefore proposed the inclusion of the Radcliffe North ward. As the Bury South constituency would no longer include this ward, we included the Kersal & Broughton Park ward from the City of Salford within the Bury South constituency. Although this would be an orphan ward, we considered it to have better physical links with the Sedgley area of Bury than the City of Salford itself.
822. The electorate of the existing Rochdale constituency is above the permitted range. We proposed a Rochdale constituency without the Spotland and Falinge ward, which would be included in a Heywood constituency. However, as the existing Heywood and Middleton constituency already had an electorate that is above the permitted range, we further proposed that the wards of South Middleton and East Middleton be included in the renamed Manchester Blackley constituency. This constituency would no longer contain any wards from the City of Salford, nor the Cheetham ward from the City of Manchester, but would include the Moston ward. We acknowledged that our proposals in this area were not ideal, but considered that the extensive disruption that would be caused by the alternatives would not provide a better solution overall for this area.
823. Within the Borough of Oldham, we proposed that both the existing Oldham East and Saddleworth, and Oldham West and Royton constituencies remain wholly unchanged. However, we sought views on an alternative which would exchange the Alexandra, and St. Mary's wards (currently within the existing Oldham East and Saddleworth constituency), with the Royton North and Royton South wards (currently within the existing Oldham West and Royton constituency), thereby providing a more compact urban constituency to the west, which would contain a greater proportion of Oldham town centre, and a constituency to the east that would have a more suburban and moorland character.
824. The existing Stalybridge and Hyde constituency could have remained unchanged, but we considered that maintaining it resulted in a less than ideal configuration across the east of Greater Manchester. We therefore proposed that the constituency would not include the Mossley, Stalybridge North, and Dukinfield Stalybridge wards, but would include the Denton North East, Denton West, and Denton South wards, being the entirety of the town of Denton. The constituency would remain wholly within the Borough of Tameside, and was named Denton and Hyde.
825. To increase the electorate of the existing Ashton-under-Lyne constituency, we included the three wards of Mossley, Stalybridge North, Dukinfield Stalybridge, as well as the Dukinfield ward, as

it contains an urban community that directly borders the centre of Ashton-under-Lyne, and was previously included within the Denton and Reddish constituency. The inclusion of all four of these wards would give the Ashton-under-Lyne constituency an electorate that was above the permitted range, so we proposed to no longer include the Failsworth East and Failsworth West wards, or the Droylsden East and Droylsden West wards within the constituency. We proposed that these four wards, along with the Audenshaw ward, would form a Failsworth and Droylsden constituency, and would also include the Clayton & Openshaw, and Gorton & Abbey Hey wards from the City of Manchester. Furthermore, we proposed dividing the Miles Platting & Newton Heath ward between this constituency and our proposed Manchester Central constituency, with the Miles Platting area, to the west of the A6010, being included in Manchester Central, and the Failsworth and Droylsden constituency, containing the Newton Heath area, to the east of this road. The Manchester Central constituency also included the Cheetham ward, as mentioned previously. We considered that not dividing the Miles Platting & Newton Heath ward would have significant negative knock-on effects across the eastern side of Greater Manchester.

### **Consultation on the initial proposals**

826. Our proposals for the Stockport constituencies of Stockport, Cheadle, and Hazel Grove were widely supported. Relatively few representations – predominantly positive – were received with regard to the following constituencies, with no counter proposals submitted: Altrincham and Sale West; Stretford and Urmston; Manchester Withington; and Wythenshawe and Sale East.
827. Our proposed Salford constituency was supported. However, our initial proposals for the remaining constituencies that included part of the City of Salford were considerably less well supported in representations, with requests for the existing Worsley and Eccles South constituency to remain unchanged. These stated that there was no commonality between the Astley Mosley Common ward and Salford borough, and that it was unsuitable to include the Walkden area of Salford in a constituency with Bolton. However, there was also some support for our initial proposal.
828. We received very few representations regarding the proposed Wigan constituency. We received a substantial number of representations (including petitions) in opposition to the proposals for the two proposed constituencies of Makerfield, and Leigh South and Atherton. In particular, there was overwhelming opposition to the proposed inclusion of the Leigh West ward (which contains Leigh Town Hall and a significant proportion of Leigh town centre) in the Makerfield constituency, and the Ashton ward (which contains half of the town of Ashton-in-Makerfield) in the Leigh South and Atherton constituency. Whilst highlighting a positive element of the initial proposals for the constituencies, in that they would unite the town of Atherton, which had previously been divided between the Leigh and Bolton South constituencies, counter proposals for alternative configurations were submitted. Among these were proposals to exchange the Golborne and Lowton West, and Lowton East wards for the Hindley and Hindley Green wards, although a number of petition representations were against this counter proposal.
829. Also contained within the counter proposals was the inclusion of the Ashton ward in the Makerfield constituency, and the Leigh West ward in the Leigh and Atherton constituency, requiring a split of both the Atherleigh and Leigh West wards (using polling districts LCA and LDA respectively). Under this counter proposal, the areas of Dangerous Corner and Pickley Green would be included in the proposed Makerfield constituency, which would be unchanged from

the existing constituency apart from the addition of these communities. The Leigh and Atherton constituency would include the remainder of both split wards.

830. The Bolton West, Bolton North East, and Bolton South and Walkden constituencies were all broadly supported, with few representations received, apart from those from the Walkden area, with a number of representations providing evidence that Walkden is an integral part of Salford borough and should not be included within a constituency alongside wards from Bolton.
831. There was support for the inclusion of the Radcliffe North ward in the proposed Bury North constituency, but there were some representations that said the Unsworth ward should be included in the Bury North constituency instead. Support for our initial proposals from respondents highlighted the strong links between the Unsworth ward and Whitefield and that we had kept the two areas together in the same constituency. We also received some support for the inclusion of the Kersal & Broughton Park ward (from the City of Salford) in the proposed Bury South constituency, but there was a request for the name of the constituency to be changed to Bury South and Kersal.
832. The proposed Rochdale constituency did not elicit a substantial number of representations, but our proposals for the Heywood and Manchester Blackley constituencies were very much opposed, with a large number of representations received from the town of Middleton, which was divided between constituencies in our proposals. Many of those objecting stated that Middleton is a historic town with a clear and long-established identity, and requested that it remain united within one constituency.
833. The responses received with regard to the two Oldham constituencies were fairly equally spread. There were also calls for the inclusion of Chadderton within the name of the western constituency.
834. We received some support for our proposed Manchester Longsight constituency, although some respondents considered that the constituency should be renamed.
835. There was considerable opposition to our proposals for constituencies in Tameside, with two key issues raised by representations. The first was that the existing Stalybridge and Hyde constituency did not need to be changed and, secondly, in the newly proposed Denton and Hyde constituency, these two towns are separated by the River Tame, so they should not be included together. Concerns were also raised that the proposed Failsworth and Droylsden constituency would cross three local authorities, and contain a split ward. We received considerable evidence that Failsworth and Droylsden do not share a community of interest and are in fact geographically separated by the River Medlock. Evidence was provided that the Denton area and east Manchester are well linked both physically and in community terms. Otherwise, the initial proposals for Manchester did not garner a large number of representations

### **Revised proposals**

836. In view of the support for the three proposed constituencies in Stockport – Stockport, Cheadle and Hazel Grove – we proposed no changes to our revised proposals. Similarly, in view of the support for the proposed Altrincham and Sale West, Stretford and Urmston, Wythenshawe and Sale East, and Manchester Withington constituencies, we proposed no change to these constituencies as initially proposed.



837. With regard to our proposals for the boroughs of City of Salford, Wigan, Bolton, and Bury, we made no changes to the Salford constituency as initially proposed, as it had been well supported. We considered that representations for the existing Worsley and Eccles South constituency to remain unchanged, although providing strong evidence to support the existing constituency, could not avoid significant impacts on a number of surrounding constituencies, which would be less in keeping with the statutory factors than the initial proposals.
838. We received very few representations regarding the Wigan constituency and consequently decided to retain the initial proposals. We noted the significant opposition to our proposed Makerfield, and Leigh South and Atherton constituencies. A counter proposal to exchange the Golborne and Lowton West, and Lowton East wards (which we had included in the Leigh and Atherton constituency) for the Hindley and Hindley Green wards (which we had included in Makerfield), while self-contained, would not, in our view, constitute a resolution to the issue of divided communities, as evidenced by the receipt of a number of petition representations against this counter proposal.
839. Our Assistant Commissioners visited the area and endorsed the counter proposal that included the Ashton ward in the Makerfield constituency, and the Leigh West ward in the Leigh and Atherton constituency, splitting both the Atherleigh and Leigh West wards (using polling districts LCA and LDA respectively), so as to keep both constituencies within the permitted electorate range.
840. Our Assistant Commissioners were mindful that the incoming ward boundary between the new Hindley Green, and Atherton South & Lilford wards is very similar to the existing polling district boundary, but more closely aligns with Westleigh Brook. They considered that splitting the LCA polling district here would mean that, although this would be splitting the two 'existing' wards of Atherleigh and Leigh West in this way, it would only be splitting a single incoming ward, Leigh West. From their observations of the area, the Assistant Commissioners concluded that Westleigh Brook is a recognisable feature, and would be a suitable boundary along which to split the polling district. Similarly, they felt that the Dangerous Corner area was no more linked to Leigh than it was to Hindley, and that Pickley Green was similarly suitable to be included within the Makerfield constituency. They therefore recommended the further division of the LCA polling district itself. We acknowledged the issues caused by the initial proposals here and that they were deeply unpopular, as a number of local ties would be broken. We agreed with the recommendations of our Assistant Commissioners and revised the Makerfield, and Leigh and Atherton constituencies, as detailed above, noting that this would maintain the existing centres of Ashton and Leigh within their respective constituencies.
841. As our proposed Bolton West, Bolton North East, and Bolton South and Walkden constituencies were all broadly supported, apart from the opposition from the Walkden area, we proposed no revision to these three constituencies as initially proposed. In respect of Bury, we agreed with the evidence provided that the Radcliffe North ward is better suited than the Unsworth ward to be included in the Bury North constituency, but did not consider there was a need to change the name of the Bury South constituency, and therefore proposed no change to the proposed Bury North and Bury South constituencies.
842. Our Assistant Commissioners noted the considerable body of objections – and the quality of the evidence – from Middleton residents opposed to the division of their town between the

Heywood and Manchester Blackley constituencies. We acknowledged that the division of the town would not be an ideal outcome, but considered that the alternatives would cause extensive disruption to neighbouring constituencies and therefore failed to provide a better overall pattern of constituencies for this wider area. We also considered whether the name of Middleton should be referenced in the name of either proposed constituency, but were ultimately not persuaded that it should be, and considered that the use of incoming ward boundaries within the Borough of Rochdale would not have any impact on resolving issues such as the division of Middleton between constituencies. We therefore recommended no revisions to the initially proposed constituencies of Heywood, Rochdale, and Manchester Blackley.

843. Within the Borough of Oldham, we noted that the representations in support and opposition to our initial proposals were broadly equal. However, our Assistant Commissioners were persuaded by the quality of the evidence presented that maintaining both of the Oldham constituencies entirely unchanged would be the solution most in keeping with the statutory factors. As such, we proposed no changes to the initial proposals for Oldham East and Saddleworth, and Oldham West and Royton. As neither constituency would be changing, we were not persuaded of the case for referencing the town of Chadderton in the Oldham West and Royton constituency name.
844. There was significant opposition to our proposals in Tameside, and we noted the major counter proposals for the area, and that there was significant disagreement among these about the best solution. Following site visits undertaken to this area by our Assistant Commissioners, and their recommendations to us, we considered that a significant change from the initial proposals in the east of Greater Manchester would be appropriate. We therefore revised our initial proposals. The existing Stalybridge and Hyde constituency would remain entirely unchanged, and we proposed an Ashton-under-Lyne constituency containing all the remaining Tameside wards, barring the three Denton wards of Denton North East, Denton South, and Denton West. These wards would be included with four wards from the City of Manchester: Burnage, Gorton & Abbey Hey, Levenshulme, and Longsight in a reconfigured Gorton and Denton constituency. Our Assistant Commissioners considered, and we agreed, that there was very persuasive evidence provided in the representations that the Denton area itself was originally overspill from east Manchester, and that the areas are well linked both physically and in community terms. They also recommended that the wards of Ardwick, Fallowfield, Hulme, Moss Side, Rusholme, and Whalley Range be included in a new, compact Manchester Rusholme constituency as part of this reconfiguration of constituencies. These wards are all to the south of the Mancunian Way, and are all of a similar character. We agreed and amended our initial proposals in this area
845. We also revised the proposed Manchester Central constituency to include the following wards: Ancoats & Beswick; Cheetham; Clayton & Openshaw; Deansgate; Miles Platting & Newton Heath; Piccadilly; Failsworth East; and Failsworth West. This would be broadly similar to the existing composition of the constituency, with the addition of Failsworth. We were persuaded by evidence that Failsworth is closely linked to east Manchester, and site visits undertaken by our Assistant Commissioners to the area confirmed this. We also noted that our revised proposals for these constituencies would remove from the east of Greater Manchester any constituency crossing three local authorities, and eliminate any requirement for a split ward, while reflecting and addressing the key issues in the objections received to initial proposals across this area.

### **Consultation on the revised proposals**

846. The Altrincham and Sale West, Cheadle, Stretford and Urmston, and Wythenshawe and Sale East constituencies were unchanged at the initial and revised proposals and very few responses were received in response to the revised proposals, with no new evidence or arguments presented. Similarly, with respect to the Hazel Grove and Stockport constituencies, very few responses were received, although a single counter proposal suggested alterations to the Hazel Grove constituency in which, it is claimed, the town of Hazel Grove is divided between constituencies.
847. In the City of Manchester and the Borough of Tameside, we had made significant changes to the initial proposals in our revised proposals for the area.
848. The new configuration for these constituencies was generally well received, particularly with regard to Ashton-under-Lyne, Stalybridge and Hyde (which was now unchanged from the existing constituency), and Manchester Withington constituencies (although there was a call to rename the constituency Chorlton and Didsbury). The Manchester Rusholme constituency was supported, with it being claimed that the wards gel well, with many similarities, including a wide population diversity in each ward. There was a suggestion that the constituency be renamed Manchester South Central, but another representation said the name Manchester Rusholme is 'inspirational'. However, there was some opposition to the Gorton and Denton constituency, particularly from the Burnage ward, where a number of respondents consider there to be no real link geographically or in community terms to Denton.
849. In the Borough of Oldham, no changes had been made to either existing Oldham constituencies in the initial or revised proposals. Despite opposition in our initial proposals, there was very little response to our revised proposals not to change the Oldham constituencies. However, although largely content with its configuration, there were further representations for Chadderton to be included in the name of the Oldham West and Royton constituency
850. We received very few responses regarding the revised proposals for the Rochdale constituency, although there was a request to rename it Rochdale East. However, there remained significant opposition to our proposed Heywood and Manchester Blackley constituencies, almost all continuing to object to the splitting of the town of Middleton between constituencies. Many of the representations made reference to the historic nature of the town of Middleton and its clear and long-established identity, and said that it should remain wholly within one constituency. Many respondents were also opposed to the town of Middleton no longer featuring in a constituency name.
851. We had proposed relatively minor changes to the Bury North and Bury South constituencies in our proposals. In the responses to our revised proposals, there were some calls to split the Radcliffe North ward and to rename one or both constituencies, but overall there were very few representations commenting on the Borough of Bury.
852. Our proposals for the Bolton West and Bolton North East constituencies had been subject to only relatively minor change. However, the Bolton South constituency had been considerably changed with the inclusion of the three wards of Walkden North, Walkden South, and Little Hulton, and a renaming to Bolton South and Walkden. This had largely maintained the town of Walkden in a single constituency rather than dividing it. Counter proposals had been submitted during the initial consultation, but we had made no further changes in our revised proposals, as we considered

no practical counter proposal was provided. Opposition to the inclusion of Walkden continued in the revised proposals consultation, but no viable solution was provided that did not result in wholesale knock-on changes across the whole of western Greater Manchester.

853. Opposition to our proposed Worsley and Eccles constituency, as mentioned previously, concerned the inclusion of the town of Walkden in the Bolton South and Walkden constituency, and that the Astley Mosley Common ward from Wigan borough was included within the proposed Worsley and Eccles constituency. As with Bolton South and Walkden, no suitable alternative counter proposal was provided despite opposition from respondents.
854. The existing Wigan constituency was retained wholly unchanged in both the initial and revised proposals and garnered minimal representations at either consultation stage. Our revised proposals to split both the Leigh West and Atherleigh wards between Makerfield, and Leigh and Atherton, generated some opposition from the Westleigh area of Leigh, which it was claimed was still not within the same constituency as Leigh. We had acknowledged that our solution here was not perfect, but opposition to our revised proposals was significantly less in number in comparison to our initial proposals.
855. The Salford constituency, as initially proposed, garnered very few representations at initial proposals. However, in the revised proposals consultation, we received a few representations stating that Swinton and Pendlebury would be divided by the proposed Salford, and Worsley and Eccles constituencies, but no viable counter proposals were submitted.

### **Final recommendations**

856. In light of the general support for the constituencies contained within the boroughs of Stockport and Trafford, we recommend all those constituencies as set out in our revised proposals.
857. Although there remained opposition to the inclusion of the town of Walkden in the Bolton South and Walkden constituency, no appropriate alternatives were submitted. Elsewhere, there was little opposition to the other constituencies we had proposed for the boroughs of Bolton and Bury. In the City of Salford, the Salford constituency garnered very few further representations. Although there was some objection to the division of Swinton and Pendlebury by the proposed Salford, and Worsley and Eccles constituencies, we again received no viable counter proposal. We therefore recommend constituencies for these three boroughs as set out in our revised proposals.
858. In the Borough of Wigan, there had been few representations throughout the consultations with regard to the Wigan constituency, and much reduced opposition to the Makerfield, and Leigh and Atherton constituencies in our revised proposals. Although we considered these remaining objections, we can identify no better alternative configuration for the area as a whole, and therefore recommend these three constituencies as set out in our revised proposals.
859. In the Borough of Rochdale, while the Rochdale constituency was largely non-contentious, we received significant opposition throughout all consultations to the proposed division of Middleton between our proposed Heywood and Manchester Blackley constituencies. We have been unable to find another solution that meets the statutory criteria and does not have major ramifications to surrounding constituencies. However, we do propose to change the name of both constituencies to reflect the significance of the town of Middleton: Heywood and Middleton North, and Blackley and Middleton South.

860. In the Borough of Oldham, we received relatively few representations apart from continued suggestions to include Chadderton in the name of the Oldham West and Royton constituency. We acknowledge that there is a lot of local support for the inclusion of Chadderton in the constituency name, and that Chadderton is an appreciably larger town (in terms of population) than Royton. We therefore recommend that the constituency be renamed Oldham West, Chadderton and Royton.
861. There was support for our revised constituencies in the Borough of Tameside, which largely reflect the existing configurations of constituencies, and we recommend those constituencies as set out in our revised proposals. In the remainder of the constituencies in the City of Manchester, we noted the general acceptance of most of these constituencies, but considered the opposition with regard to the inclusion of the Burnage ward in a constituency with Denton. We noted that Burnage is well linked to the Levenshulme and Longsight wards to its north and that there is no way of amending this one small area and including Burnage in the Manchester Withington constituency without negative consequential changes throughout this part of Manchester, or effectively reverting to the initial proposals. We therefore recommend constituencies across these two council areas as set out in our revised proposals.
862. Our final recommendations for Greater Manchester are therefore for constituencies of: Altrincham and Sale West; Ashton-under-Lyne; Blackley and Middleton South; Bolton North East; Bolton South and Walkden; Bolton West; Bury North; Bury South; Cheadle; Gorton and Denton; Hazel Grove; Heywood and Middleton North; Leigh and Atherton; Makerfield; Manchester Central; Manchester Rusholme; Manchester Withington; Oldham East and Saddleworth; Oldham West, Chadderton and Royton; Rochdale; Salford; Stalybridge and Hyde; Stockport; Stretford and Urmston; Wigan; Worsley and Eccles; and Wythenshawe and Sale East. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## South East

863. The South East currently has 84 constituencies. Of these constituencies, 37 have electorates within the permitted electorate range. The electorates of two constituencies currently fall below the permitted electorate range, while the electorates of 45 constituencies are above. Our proposals increase the number of constituencies in the region by seven, to 91, including the two protected constituencies allocated to the Isle of Wight.
864. The South East comprises the counties of Berkshire (including the following boroughs and districts: Bracknell; Reading; Slough; West Berkshire; Windsor and Maidenhead; and Wokingham), Buckinghamshire (including the City of Milton Keynes), Hampshire (including the cities of Portsmouth and Southampton), the Isle of Wight, Kent (including the unitary authority of Medway), Oxfordshire, Surrey, East Sussex (including the City of Brighton and Hove), and West Sussex, and is covered by a mix of district and county councils, and unitary authorities.
865. We appointed two Assistant Commissioners for the South East – Howard Simmons and Simon Tinkler – to assist us with the analysis of the representations received during the first two consultation periods. This included chairing public hearings, which were held in the region in order to hear oral evidence directly from the public. The dates and locations of these hearings were:
- Crawley: 14–15 March 2022
  - Portsmouth: 17–18 March 2022
  - Reading: 21–22 March 2022
  - Ashford: 24–25 March 2022.

### Sub-division of the region

866. In formulating our initial proposals, we noted that the electorate of the South East of 6,634,518 results in it being entitled to 91 constituencies, an increase of seven. Additionally, the rules that govern how we must allocate constituencies state that two must be allocated to the Isle of Wight, and that neither of these is required to have an electorate that is within the permitted range. We then considered how the remaining number of constituencies could be split across the region.
867. We noted that Berkshire's electorate of just over 635,000 results in a mathematical entitlement to 8.65 constituencies; however, we felt that we would not be able to adequately reflect the statutory factors with an allocation of nine constituencies. Although both Hampshire and Surrey, with respective mathematical entitlements of 18.44 and 11.72 constituencies, could have stood alone as sub-regions, we noted that combining both with Berkshire in a single sub-region enabled the preservation of a number of existing constituencies, particularly along the coast of Hampshire. We therefore decided to allocate 39 constituencies to the sub-region of Berkshire, Hampshire and Surrey, an increase of two on the current allocation.
868. The City of Milton Keynes has an electorate of 188,273, which is too large to allocate two whole constituencies: it is therefore necessary to pair it with Buckinghamshire, for a combined

mathematical entitlement to 8.00 constituencies. We therefore proposed to allocate eight constituencies to this sub-region, an increase of one.

869. Oxfordshire's electorate of nearly 500,000 results in a mathematical entitlement to 6.81 constituencies. We were therefore able to treat Oxfordshire as a sub-region in its own right, with an allocation of seven constituencies, an increase of one.
870. Similarly, the electorate of Kent, including the Medway unitary authority, is 1,325,000, equating to a mathematical entitlement to 18.05 constituencies, and we therefore proposed a Kent sub-region with an allocation of 18 constituencies, again an increase of one on the existing allocation.
871. The City of Brighton and Hove has just over 200,000 electors, and a mathematical entitlement to 2.75. Given the city's historic links with East Sussex, and the existing configuration of constituencies, we considered it appropriate to include both in a single sub-region. Given East Sussex's electorate of 414,451, this pairing has a combined mathematical entitlement to 8.40 constituencies. As in Berkshire above, we felt that, while mathematically achievable, it would be prohibitively difficult to propose eight constituencies which reflected the statutory factors. We therefore decided to include West Sussex, with a mathematical entitlement to 8.81 constituencies, in a wider Sussex sub-region, with an allocation of 17 constituencies, an increase of one.
872. The use of the sub-regions outlined above was largely supported during the consultation on the initial proposals. We did receive some objections to the split of sub-regions with alternative arrangements suggested such as:
- a sub-region which comprised the areas of Berkshire and Buckinghamshire
  - a sub-region which comprised the areas of Surrey and Kent.
873. We also received proposals from some respondents that supported our proposed sub-regions, but suggested alternative crossings between the counties involved. These proposals largely involved the inclusion of a constituency crossing between Berkshire and Hampshire, either in addition to the crossings proposed, or in order to allow Surrey to be self-contained.
874. In formulating our revised proposals, we considered that no persuasive evidence had been received to propose a different configuration of sub-regions. We assessed whether crossing from Berkshire into either Buckinghamshire or Hampshire would improve our proposals across the region. We noted that this would assist in creating a scheme of constituencies in the Reading area that is closer to the existing constituencies; however, such a scheme would be reliant on a geographically large cross-county boundary constituency, and disrupt several constituencies which were well received during the consultation on the initial proposals. We also had concerns how this counter proposal would impact on the number of local authorities divided between constituencies. Our revised proposals were, therefore, based on the same sub-regions as those of our initial proposals
875. In response to our revised proposals, we did not receive any further evidence that would justify the use of alternative sub-regions to those we adopted in our revised proposals. Therefore, the sub-regions we propose as part of the final recommendations are:
- Berkshire, Hampshire (including Portsmouth and Southampton) and Surrey

- Buckinghamshire (including Milton Keynes)
- East Sussex (including Brighton and Hove) and West Sussex
- Isle of Wight
- Kent (including Medway)
- Oxfordshire.

## **Berkshire, Hampshire and Surrey**

### **Berkshire**

#### **Initial proposals**

876. Of the eight existing constituencies in Berkshire, three are currently within the permitted electorate range: Reading East, Reading West, and Windsor. The remaining five constituencies are all above the permitted range: Newbury; Wokingham; Bracknell; Maidenhead; and Slough. Under our initial proposals we proposed changes to all existing constituencies in Berkshire. We proposed a single constituency containing most of the Borough of Reading, with three borough wards in the west and two in the south being included in the Mid Berkshire, and Earley and Woodley constituencies respectively. As a result of this configuration, we proposed Newbury and Wokingham constituencies respectively comprising the areas of the District of West Berkshire and District of Wokingham not otherwise included in the Mid Berkshire, and Earley and Woodley constituencies.
877. As the existing Slough constituency is above the permitted range, we proposed to include the wards of Langley Kedermister and Foxborough in the Windsor constituency. We also, for the reasons outlined above, proposed that the Windsor constituency include two wards from Surrey, namely Egham Town and Egham Hythe. As the Bracknell constituency was within the permitted range without the area of Wokingham Borough included in the existing constituency, and after some minor changes to realign to new local government ward boundaries, we proposed no additional changes. Consequentially, we proposed that the remainder of the District of Bracknell Forest area be included in the Maidenhead constituency.

#### **Consultation on the initial proposals**

878. In response to the consultation on the initial proposals, our proposed constituencies across Berkshire were broadly supported, except in Reading, where they were opposed by some who recommended returning to a two-seat configuration and leaving the existing Reading West and Reading East constituencies wholly or mostly unchanged. We received a counter proposal which achieved this by including a constituency which crossed the boundary between Berkshire and Hampshire.
879. The proposed Mid Berkshire constituency was mostly opposed by residents of the Borough of Reading, who argued that the wards of Kentwood, Norcot, and Tilehurst have little in common with the remainder of the constituency; however, representations from the West Berkshire component of this constituency were more favourable. Another objection made about the proposed Mid Berkshire constituency was that it contained the Ilsey villages, which some felt



have more commonality with the proposed Newbury constituency (which was otherwise little commented on).

880. The proposed Earley and Woodley constituency also received a mix of representations, though the greater number were in support of our proposals. The proposed Wokingham constituency was strongly supported.
881. We received opposition to our proposal to include the Langley Kedermister and Foxborough wards in the proposed Windsor constituency, though those that acknowledged that some part of Slough Borough would have to be included in a Windsor constituency to avoid crossing the boundary between Berkshire and Buckinghamshire generally agreed that the initial proposals were the strongest option. The proposed crossing of the boundary between Berkshire and Surrey in the Windsor constituency was also unpopular, both as a matter of general principle and specifically the choice of the two Egham wards.
882. A small number of representations were received opposing the proposed Maidenhead constituency, with some respondents suggesting this constituency could contain less of the Bracknell Forest council area. We received a counter proposal that split wards to achieve this.

### **Revised proposals**

883. In light of the evidence received, our Assistant Commissioners considered recommending changes in Berkshire; however, they concluded that no counter proposals had been received which improved the scheme of constituencies across the county as a whole. In particular, they felt that counter proposals that crossed the county boundary between Berkshire and Hampshire would have weaker community links than the initial proposals, and noted that such counter-proposals necessarily disrupted the mostly supported initial proposals for the Earley and Woodley, and Wokingham constituencies.
884. They therefore did not recommend any changes to any of the initially proposed constituencies that are wholly within Berkshire (though they did propose changes to the Surrey component of the Windsor constituency, see below). We accepted the Assistant Commissioners' recommendation, and therefore the revised proposals for Berkshire were unchanged from the initial proposals.

### **Consultation on the revised proposals**

885. As no changes were made to our initial proposals for Berkshire, most responses to the revised proposals consultation, whether in support or opposition, simply restated the same points made during the earlier consultation phases. We did, however, receive a new proposal which retained the existing Reading East constituency wholly unchanged, and the existing Reading West constituency changed only by the exclusion of the Theale ward. This proposal recommended a constituency that crosses the county boundary between Berkshire and Hampshire, and also includes the towns of Earley and Shinfield, thereby dividing the existing Wokingham constituency into two proposed constituencies, rather than three, as in our revised proposals.
886. The changes which we made to the proposed Windsor constituency were well supported by residents of the Berkshire component of this constituency, though some suggested that Windsor Great Park would be more reflective of the area the proposed constituency would comprise.

## Final recommendations

887. Having considered the evidence received, we are not recommending changes to the boundaries of our revised proposals for Berkshire. Strong consideration was again given as to whether or not to recommend a constituency which crosses the boundary between Berkshire and Hampshire. We acknowledge that such a solution would be less disruptive to the existing Reading East and Reading West constituencies than our revised proposals; however, we note that such a proposal would involve additional crossings of local authority boundaries, including dividing the Borough of Basingstoke and Deane between five constituencies. We also note that very few representations have been received which support a cross-county boundary constituency, particularly compared with the broadly positive reception to our Earley and Woodley constituency. Furthermore, we had concerns that the proposed constituency crossing the boundary between Berkshire and Hampshire under this counter proposal would result in the division of Tadley between constituencies.
888. We do, however, acknowledge that the name of our proposed Mid Berkshire constituency does not reflect that this constituency is a clear successor to the existing Reading West constituency. We therefore recommend that the name of this constituency is amended to Reading West and Mid Berkshire in our final recommendations. Consequently, we have also amended the name of our proposed Reading constituency to Reading Central.
889. Our final recommendations in Berkshire are therefore for constituencies of: Bracknell; Earley and Woodley; Maidenhead; Newbury; Reading Central; Reading West and Mid Berkshire; Slough; Windsor; and Wokingham. These constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.

## Hampshire

### Initial proposals

890. Of the 18 existing constituencies in Hampshire, 13 are currently within the permitted electorate range, one constituency is below the permitted range, Romsey and Southampton North, and four are above: Basingstoke; Eastleigh; Fareham; and North West Hampshire. We proposed a constituency, Farnham and Bordon, that included parts of both Hampshire and Surrey, as doing so enabled us to propose a number of constituencies wholly unchanged. The initially proposed Farnham and Bordon constituency included six wards from the District of East Hampshire, the remainder of which was proposed as the East Hampshire constituency.
891. Our initial proposals included: Gosport; Havant; Portsmouth North; Portsmouth South; Southampton Itchen; Southampton Test; East New Forest; and West New Forest. These constituencies were unchanged from their existing configurations, although we did make a minor adjustment to the names of the latter two constituencies. Additionally, we proposed an Aldershot constituency changed only to align to new local government ward boundaries.
892. We proposed some changes to the existing Basingstoke and North East Hampshire constituencies, most significantly the inclusion of the entire ward of Basing & Upton Grey in the latter. In order to ensure both of these proposed constituencies were within the permitted electorate range, we divided the Oakley & The Candovers ward between the two, largely aligning the boundary with the M3 motorway.

893. As we proposed that North West Hampshire include the Tadley & Pamber, and Sherborne St. John & Rooksdown wards, it was necessary to reduce the electorate in the west of the existing constituency. We therefore proposed that the Anna, Bellinger, and Charlton & the Pentons wards be included in the Romsey and Southampton North constituency, the only other change to which being the exclusion of the Valley Park ward, which we proposed in the Eastleigh constituency.
894. In order to reduce the electorate of the Eastleigh and Fareham constituencies, we proposed a Hedge End constituency comprising areas around the River Hamble, including Titchfield, Shedfield, and Bursledon. We also proposed a Fareham and Waterlooville constituency which included the eponymous towns and rural areas of the lower Meon Valley between the two. Our proposed Winchester constituency extended further south than the existing constituency, to include the remainder of the City of Winchester local authority.

### **Consultation on the initial proposals**

895. The response to our initial proposals for Hampshire was broadly positive, particularly for the eight unchanged constituencies along the coast of Hampshire, although the proposed name changes for the two New Forest constituencies were opposed, with respondents expressing a strong preference for retaining the existing constituency names, which use compass points as a suffix. It was also suggested that the proposed Havant constituency should be designated as a county constituency to reflect the less accessible areas of this constituency.
896. Our proposals for Aldershot, North East Hampshire, Basingstoke, North West Hampshire, and Romsey and Southampton North were objected to by several respondents. Among the issues raised were the division of Yateley between the proposed Aldershot and North East Hampshire constituencies, the exclusion of the Old Basing and Rooksdown areas from the Basingstoke constituency, and the inclusion of the Charlton & the Pentons ward in the Romsey and Southampton North constituency. The inclusion of the Bassett and Swaythling wards from the City of Southampton in this constituency was also opposed, although this aspect of the proposed constituency is unchanged from the existing configuration. We received a number of counter proposals which addressed some of these issues; however, some respondents noted in support of our proposals that it is difficult to resolve all of these concerns without resorting to a number of split wards.
897. We received a large number of representations in support of our proposed Winchester constituency, many of which commented that our proposals for this constituency were better aligned with local authority boundaries than the existing constituency. We did, however, receive representations which regretted the lack of an obvious successor to the existing Meon Valley constituency. This view was widely shared among residents of the Denmead, and Southwick & Wickham wards, which we proposed as part of the Fareham and Waterlooville constituency. This constituency was also opposed by residents of both eponymous towns, who argued that there is no community of interest between the two, with residents of Fareham in particular expressing a preference for an alternative that would more closely resemble the existing configuration. We received a number of counter proposals which sought to propose a constituency similar to the existing Meon Valley, though many of these necessitated dividing Fareham between two or more constituencies.
898. The proposed Eastleigh constituency attracted few representations, except for a small number in opposition to the inclusion of the Valley Park ward. The proposed Hedge End constituency

received a mix of representations in support and in opposition; however, the most common concern was that the name of this constituency was not sufficiently representative, with some suggesting Hamble Valley to reflect the river that is central to the proposed constituency.

899. The largest number of representations in Hampshire during the initial proposals consultation were made concerning the proposed East Hampshire, and Farnham and Bordon constituencies. While a number of responses were supportive of our proposals for East Hampshire, particularly noting the inclusion of additional areas of the East Hampshire district in this constituency, a greater number were opposed to the inclusion of wards in the Farnham and Bordon constituency. These representations centred on two key themes: general opposition to any constituency containing parts of both Surrey and Hampshire, and specific opposition to the division of the Bordon and Whitehill area, which many respondents felt is a single settlement. Some that accepted the principle of a cross-county boundary constituency commented that including the Whitehill Hogmoor & Greatham ward in the proposed Farnham and Bordon constituency would be a solution to this latter concern.

### **Revised proposals**

900. In light of the representations received, our Assistant Commissioners recommended that we make changes to our initial proposals for Hampshire.
901. Our Assistant Commissioners considered the many counter proposals we received which affected constituencies in Hampshire. As above, they did not feel that there was merit in recommending a constituency which crossed the boundary between Hampshire and Berkshire. They also felt that none of the other counter proposals which sought to address issues in the north of Hampshire represented an improvement on the initial proposals.
902. Consideration was also given to counter proposals which suggested retaining a close analogue to the existing Meon Valley constituency. The Assistant Commissioners noted that adopting this counter proposal would require changes to our proposed Winchester constituency that have been supported during the consultations. On balance, they were not persuaded to modify the proposed Winchester constituency and therefore did not recommend modifying the configuration of constituencies in this part of the county.
903. The division of the Bordon and Whitehill area under the initial proposals was acknowledged by the Assistant Commissioners to be problematic. While they agreed with the substance of our initial recommendation that the proposed Farnham and Bordon constituency should contain parts of both Surrey and Hampshire, they agreed with a counter proposal which suggested that the Whitehill Hogmoor & Greatham ward should be included in this constituency too. This counter proposal balanced the electorate of the proposed East Hampshire constituency by including all of the Oakley & The Candovers ward, thereby reuniting a ward which we proposed to be split in the initial proposals. The Assistant Commissioners did not agree with this aspect of the counter proposal, as they felt that the split ward had been broadly well received, and that the resulting East Hampshire constituency would have poor connectivity. They therefore recommended retaining the split of Oakley & The Candovers from the initial proposals, but transferring the part proposed in the North East Hampshire constituency to the revised East Hampshire constituency. This counter proposal also had some consequential effects for constituencies in Surrey, which are discussed below.

904. The Assistant Commissioners were also persuaded by representations made concerning the names of the proposed Hedge End, West New Forest, and East New Forest constituencies, and recommended that we revise the names of these constituencies to Hamble Valley, New Forest West, and New Forest East respectively.
905. We agreed with these recommendations, and therefore we confirmed the initial proposals for twelve constituencies in Hampshire, proposed boundary changes for three constituencies (East Hampshire, Farnham and Bordon, and North East Hampshire), and proposed name changes for three constituencies (Hamble Valley, New Forest West, and New Forest East).

### **Consultation on the revised proposals**

906. In the revised proposals consultation, the proposed eight unchanged south coast constituencies were again supported, in particular the revised names of the two New Forest constituencies.
907. Few responses were received concerning our revised proposal to include part of the Oakley & The Candovers ward in East Hampshire, but those we did receive generally opposed our proposal. The division of Yateley between Aldershot and North East Hampshire, the exclusion of areas of urban Basingstoke from the Basingstoke constituency, and the inclusion of Charlton & the Pentons in Romsey and Southampton North rather than North West Hampshire were again commented upon by a small number of respondents, including in new counter proposals which suggested splitting one or more wards in order to resolve some of these issues.
908. We received a number of responses supportive of our proposal to include the Whitehill Hogmoor & Greatham ward with the remainder of the Bordon and Whitehill area in the Farnham and Bordon constituency, although these responses generally expressed regret that our proposals did not avoid crossing the boundary between Surrey and Hampshire altogether. Some respondents suggested that the name Wey Valley would be a more descriptive name for this constituency.
909. We again received a sizeable number of representations in support of the proposed Winchester constituency, offset by a smaller number which preferred a version of the existing Meon Valley constituency – counter proposals to this effect were again advanced, but without substantively new evidence in support of such a configuration. The proposed Fareham and Waterlooville constituency was again negatively received, though the only new suggestion was that we consider Forest of Bere as an alternative name for this constituency.
910. The proposed Eastleigh constituency again attracted only a small number of representations, which expressed opposition to the inclusion of Valley Park and West End, which respondents felt are better suited to the constituencies of Romsey and Southampton North, and Hamble Valley respectively. Our revised name for the Hamble Valley constituency was broadly supported, though the reaction to the proposed boundary was again mixed.

### **Final recommendations**

911. Having considered the evidence, we are not recommending any changes to the boundaries of our proposed constituencies in Hampshire. As discussed above, we are not recommending a constituency that crosses the boundary between Berkshire and Hampshire; however, we considered whether alternative changes could be made to repair broken ties in Yateley, and between Charlton & the Pentons, and Andover. We concluded that this was impossible without

either dividing an unacceptable number of wards, or disrupting a number of constituencies which were well received during the consultation periods.

912. We also considered whether or not to retain the divide of the Oakley & The Candovers ward, given that the whole ward could be included in the East Hampshire constituency. We note that the inclusion of the Oakley part of this ward in the Basingstoke constituency has been generally well supported, and that our proposed split of this ward approximately follows the M3, which we consider to be a sensible physical boundary. We additionally note that, while there is good evidence of transport and community linkages between Oakley and Basingstoke, there is no such evidence for linkages with East Hampshire. We therefore feel that it would be pragmatic to retain this divided ward in our final recommendations.
913. We note the sustained opposition to our proposed Fareham and Waterlooville constituency. We again considered whether or not to make changes to this constituency; however, we note that counter proposals received either divide Fareham in half, or else disrupt the large number of constituencies on the Hampshire coast that could otherwise be retained wholly unchanged. We have therefore concluded that the revised proposals best reflect the statutory factors.
914. Finally, we considered alternative names for constituencies in Hampshire. While we note the support for Forest of Bere as an alternative name for the Fareham and Waterlooville constituency, we feel that this name is not sufficiently descriptive of the area covered by the constituency, and therefore have retained the name Fareham and Waterlooville in our final recommendations. Similarly, while we acknowledge support for the name Wey Valley instead of Farnham and Bordon, we feel that this name would not reflect the Hampshire component of this cross-county boundary constituency, and hence have retained the name Farnham and Bordon in our final recommendations.
915. Our final recommendations in Hampshire are therefore for constituencies of: Aldershot; Basingstoke; East Hampshire; Eastleigh; Fareham and Waterlooville; Gosport; Hamble Valley; Havant; New Forest East; New Forest West; North East Hampshire; North West Hampshire; Portsmouth North; Portsmouth South; Romsey and Southampton North; Southampton Itchen; Southampton Test; and Winchester. These constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.

## **Surrey**

### **Initial proposals**

916. Of the 11 existing constituencies in Surrey, five are currently within the permitted electorate range (Mole Valley; Reigate; Runnymede and Weybridge; Spelthorne; and Woking), and the remaining six are above (East Surrey; Epsom and Ewell; Esher and Walton; Guildford; South West Surrey; and Surrey Heath). As discussed above, we initially proposed two constituencies which contained parts of Surrey and another county: the proposed Windsor constituency, which included the Surrey wards of Egham Town and Egham Hythe, and Farnham and Bordon, which combined the western part of the Borough of Waverley with six wards from Hampshire.
917. We proposed that the Spelthorne and Woking constituencies be coterminous with the local authorities of the same names. In the former case, this represents no change from the existing

configuration, and in the latter case, changed only by the exclusion of the Normandy and Pirbright wards, which we proposed be included in the Surrey Heath constituency, along with the whole of the Surrey Heath district.

918. As this proposed Surrey Heath constituency could not accommodate the wards of Ash Vale, Ash Wharf, and Ash South and Tongham, we proposed that these wards be included in a Godalming and Ash constituency, along with the wards of Pilgrims, Shalford, and Tillingbourne, and the eastern part of the Borough of Waverley. This allowed us to propose a Guildford constituency that would be wholly within the borough of the same name.
919. As the proposed Weybridge and Chertsey constituency, renamed from Runnymede and Weybridge, would no longer include the two Egham wards (we proposed these wards be included in the Windsor constituency), we proposed to extend this constituency to the south, to include the wards of Cobham & Downside, Weybridge St. George's Hill, and the whole of the Oatlands & Burwood Park ward. The exclusion of these same wards were the only changes we proposed to the existing Esher and Walton constituency under our initial proposals.
920. We noted that a proposed Epsom and Ewell constituency could continue to include all of the Borough of Epsom and Ewell; however, we proposed that this constituency should extend further south, rather than east as at present, to include the town of Leatherhead. Consequently, we proposed that the Reigate constituency include the Nork, and Tattenham Corner & Preston wards, and that the Dorking and Horley constituency comprise the majority of the District of Mole Valley (excluding Ashted and Leatherhead) and the south of the Borough of Reigate and Banstead. Our proposed East Surrey constituency contained all of the District of Tandridge, and the Borough of Reigate and Banstead ward of Hooley, Merstham & Netherne.

### **Consultation on the initial proposals**

921. As discussed above, both proposed constituencies which crossed county boundaries drew representations in opposition; however, among residents of the Surrey component of the constituency, our proposed Farnham and Bordon constituency attracted little comment beyond generalised opposition to the principle of crossing the boundary between Surrey and Hampshire. The proposed inclusion of the two Egham wards in the proposed Windsor constituency drew greater opposition, with many suggesting that the connections of these wards are much stronger with Surrey, particularly Runnymede, than with Berkshire. We received a counter proposal which suggested that the two Englefield Green wards and the Virginia Water ward would be a better fit in a Windsor constituency, and allow the Egham wards to be included in the Weybridge and Chertsey constituency. Additionally, we received several counter proposals which removed either or both of our proposed cross-county boundary constituencies, by proposing alternative configurations of sub-regions.
922. Our proposal to include the Cobham & Downside ward in Weybridge and Chertsey was very unpopular, with a great many respondents arguing that this ward and the neighbouring Oxshott & Stoke D'Abernon ward form a single community, particularly noting that Cobham and Stoke D'Abernon share a train station. We received a counter proposal which suggested that both of these wards should be included in the Esher and Walton constituency, as at present, and that instead the Hersham Village ward should be included in Weybridge and Chertsey; however, this was itself strongly opposed by some representations made during the secondary consultation. Some respondents also objected to our proposed name for the Weybridge and Chertsey

constituency: most of them felt that the existing Runnymede and Weybridge constituency name was sufficiently descriptive of this new constituency.

923. We received very few representations concerning our proposals for Spelthorne and Woking, but those we did receive were supportive of these constituencies aligning to local authority boundaries. Our proposed Surrey Heath constituency was also little commented on, although we did receive a small number of representations opposed to the inclusion of the Normandy and Pirbright wards in this constituency. Respondents generally stated that these wards share a greater community of interest with the Guildford constituency, which was otherwise supported by nearly all representations received.
924. Our proposed Godalming and Ash, and Dorking and Horley constituencies were both opposed, albeit in relatively small numbers. The primary theme of responses from these constituencies was the lack of community ties between the eponymous towns in both instances. We received a number of counter proposals which affected these constituencies, some of which suggested alternative pairings of large settlements in this area, such as Ash and Guildford, or Reigate and Horley. The inclusion of the Hooley, Merstham & Netherne ward in our proposed East Surrey constituency was also opposed by a small number of respondents.
925. The changes which we proposed to the existing Epsom and Ewell constituency were broadly well received, with respondents commenting that Leatherhead has good connections with Epsom and Ewell. Supportive representations also noted that this proposal would reduce the number of local authorities in the Epsom and Ewell constituency from three, at present, to two.
926. By far the largest number of responses to our initial proposals in Surrey concerned the exclusion of the South Park & Woodhatch ward from the Reigate constituency. We received more than 700 responses in opposition to the proposal to include this ward in the Dorking and Horley constituency, with many commenting that the ward forms an integral part of the town of Reigate. We received a number of counter proposals which included this ward in a Reigate constituency, ranging from small single ward transfers between constituencies, to widespread reorganisation of constituencies in Surrey, such as those discussed above.

### **Revised proposals**

927. In light of the representations received, our Assistant Commissioners recommended that we modify our initial proposals for Surrey.
928. Having visited the area, our Assistant Commissioners were persuaded that the areas of Virginia Water and Englefield Green would have a greater community of interest with the proposed Windsor constituency than the two Egham wards, and they therefore recommended that these wards be exchanged. They also agreed that our proposal to name the constituency Weybridge and Chertsey was unnecessary, as the existing name of Runnymede and Weybridge would still accurately describe the proposed constituency.
929. Our Assistant Commissioners also agreed with respondents that the wards of Cobham & Downside, and Oxshott & Stoke D'Abernon reflect a single community, and therefore these wards should be represented together. They also, however, considered it essential that the Hersham Village ward be retained in the Esher and Walton constituency, given the ward's clear ties to both towns, and did not feel that sufficient evidence had been presented that the same ties exist



between Esher, Walton, and the rural areas to the south. Our Assistant Commissioners therefore recommended that the Cobham & Downside and Oxshott & Stoke D'Abernon wards be included in the Runnymede and Weybridge constituency, and that the Oatlands & Burwood Park ward be included in Esher and Walton.

930. Given both the quantity and quality of evidence received concerning the South Park & Woodhatch ward, our Assistant Commissioners felt that it was essential to make changes to our proposals, to ensure that this ward be included in the Reigate constituency. Although they considered counter proposals which more radically reconfigured constituencies in Surrey, they felt that these options would be less compliant with the statutory factors. They therefore recommended a counter proposal which included the South Park & Woodhatch ward in the Reigate constituency, the Ewhurst ward in the Dorking and Horley constituency, and the Elstead and Thursley ward in the Godalming and Ash constituency (as well as some consequential effects to constituencies in Hampshire, discussed above).
931. We agreed with all of the recommendations of the Assistant Commissioners, and therefore we confirmed the initial proposals for six constituencies in Surrey (East Surrey; Epsom and Ewell; Guildford; Spelthorne; Surrey Heath; and Woking), and proposed boundary changes to the Dorking and Horley, Esher and Walton, Godalming and Ash, Reigate, and Runnymede and Weybridge constituencies. We also proposed a name change to the last of these, and boundary changes to the Surrey component of the Windsor constituency.

### **Consultation on the revised proposals**

932. Responses from the Surrey component of the proposed Farnham and Bordon constituency were broadly negative, with several respondents noting that, while there is a strong community of interest between the Waverley Borough wards in this constituency, those community ties do not extend across the county boundary. Although responses supported our proposal to include the two Egham wards in our revised proposal for Runnymede and Weybridge, and our revised Windsor constituency was generally well supported by residents of its Berkshire component (as discussed above), we did receive a small number of representations suggesting that Virginia Water and Englefield Green share no more of a community of interest with Windsor than Egham does, and so should not be included in a constituency which crosses county boundaries.
933. We again received almost no substantive representations concerning the proposed Woking and Spelthorne constituencies, but representations that made general comments about the South East region were supportive of both constituencies.
934. Our revised proposals for Runnymede and Weybridge, and Esher and Walton, which exchanged the Oatlands & Burwood Park ward for the Oxshott & Stoke D'Abernon ward, were supported by more than 150 representations. Responses from both wards agreed with our assessment that the former's local government ties to Esher evidenced a clear local connection, and that respecting the latter's ties with Cobham & Downside should be prioritised over ties with Esher.
935. The response to our revised proposal for Reigate, including the South Park & Woodhatch ward, was positive; however, the consequential change to Dorking and Horley, in which we proposed to include the Ewhurst ward, was unpopular, on the grounds that it broke ties between Ewhurst and Cranleigh. The other consequential change in the revised proposals, the transfer of the Elstead and Thursley ward to the proposed Godalming and Ash constituency, did not attract

many representations. The lack of commonality between the named settlements in the Godalming and Ash, and Dorking and Horley constituencies was again commented upon, and we received new counter proposals affecting these constituencies, including one which paired Godalming with Guildford, and another which paired Farnham with Ash and Aldershot, thereby crossing the boundary between Surrey and Hampshire in a different place.

936. Respondents from the Normandy and Pirbright wards again opposed being included in the proposed Surrey Heath constituency. We received a counter proposal which suggested transferring the former to the Guildford constituency, with Surrey Heath instead taking the ward of Longcross, Lyne & Chertsey South.
937. A small number of submissions were made concerning the proposed East Surrey, and Epsom and Ewell constituencies; however, no new arguments were advanced concerning either.

### **Final recommendations**

938. Having considered the evidence, we are not persuaded to amend any of our revised proposals for Surrey. We note objections to the inclusion of the Ewhurst ward in our proposed Dorking and Horley constituency; however, including this ward in Godalming and Ash would require significant changes to constituencies which had been well supported. We considered dividing the Borough of Guildford ward of Tillingbourne between the proposed Dorking and Horley and Godalming and Ash constituencies in order to include the Ewhurst ward in Godalming and Ash; however, we were unpersuaded that this change would be less divisive for local communities than our revised proposals.
939. We also considered the counter proposals we received for alternative constituencies in Surrey. We do not feel that the evidence received suggested that pairing Guildford with Godalming, or Farnham with Ash, would be an improvement on our revised proposals. While we appreciate that the ties of the Normandy ward may be stronger with Guildford than with Surrey Heath, we note that including the Longcross, Lyne & Chertsey South ward in Surrey Heath would unnecessarily extend the constituency into a third local authority.
940. Our final recommendations in Surrey are therefore for constituencies of: Dorking and Horley; East Surrey; Epsom and Ewell; Esher and Walton; Farnham and Bordon; Godalming and Ash; Guildford; Reigate; Runnymede and Weybridge; Spelthorne; Surrey Heath; and Woking. These constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.

## **Buckinghamshire**

### **Initial proposals**

941. Only one existing constituency in Buckinghamshire, Chesham and Amersham, is within the permitted electorate range, the remaining six are all above the permitted range. As new local government arrangements for Buckinghamshire were approved shortly before the commencement of the review, the electoral divisions used for the review were those of the now defunct Buckinghamshire County Council. As these electoral divisions were a placeholder arrangement, and their shapes and electorate sizes are particularly large, we took a pragmatic approach towards the splitting of wards in Buckinghamshire.

942. The City of Milton Keynes was not affected by changes to local government arrangements in Buckinghamshire; however, it is not possible to propose a whole number of constituencies coterminous with the local authority boundaries. Therefore, without crossing regional boundaries, it was necessary to propose a constituency which contained parts of both the Milton Keynes and Buckinghamshire unitary authorities – our initial proposal was for a Buckingham and Bletchley constituency containing four wards from each. We divided the remainder of the Milton Keynes unitary authority into two constituencies – Milton Keynes, which comprised the core urban area of the city, and Newport Pagnell, which comprised more rural and suburban areas to the north and west.
943. As our initial proposals allocated eight constituencies to Buckinghamshire, an increase of one on the existing allocation, it was necessary for us to propose a constituency without an obvious predecessor. We considered that the best way to accommodate this additional constituency was to propose a large rural constituency spanning central Buckinghamshire, which we called Princes Risborough. As we proposed that this constituency include the Ridgeway East, Ridgeway West, and Wendover, Halton and Stoke Mandeville wards, which are currently part of the Aylesbury constituency, we proposed that the Aylesbury constituency be reoriented to the north, to include the wards of Ivinghoe and Wing.
944. Our proposals for Aylesbury and Princes Risborough meant that we could retain the remaining three constituencies in Buckinghamshire with only minimal changes. We proposed a Marlow and South Buckinghamshire constituency which was changed from the existing Beaconsfield constituency only by the transfer of the Beaconsfield ward to Chesham and Amersham (though, for obvious reasons, it was necessary to amend the name of this constituency). Similarly, the proposed High Wycombe constituency differed from the existing Wycombe constituency only in the transfer of the Hazlemere ward to Chesham and Amersham, and a small amount of change to realign to the boundary of the West Wycombe ward; however, again, we decided to change the name to reflect the largest settlement in this constituency, rather than the defunct local authority district.
945. With the inclusion of the Beaconsfield and Hazlemere wards, it was not possible to retain the existing Chesham and Amersham constituency otherwise unchanged. In order to minimise disruption, we decided to transfer the Great Missenden and Chiltern Ridges wards to the proposed Princes Risborough constituency; however, in the latter case, we divided the ward to retain an area of central Chesham in our proposed Chesham and Amersham constituency.

### **Consultation on the initial proposals**

946. Our proposed Buckingham and Bletchley constituency was mostly opposed during the consultation on the initial proposals; however, the majority of these representations were opposed to any constituency containing parts of both Buckinghamshire and Milton Keynes. Those that acknowledged the need for such a constituency broadly supported the pairing of Buckingham with Bletchley, though we did receive counter proposals which suggested using wards in the west of Milton Keynes instead.
947. The boundaries of the two constituencies which we proposed wholly within the City of Milton Keynes were generally supported; however, our proposed names were not. Newport Pagnell in particular was considered to be unreflective of the full extent of this constituency, with the most commonly suggested alternative being to retain the existing name of Milton Keynes North.

Supporters of this alternative acknowledged that this would necessitate a change to the name of our proposed Milton Keynes constituency, and again stated that the existing name of Milton Keynes South would be suitable.

948. The proposed Aylesbury constituency received comparatively few representations; however, the inclusion of the Ivinghoe and Wing wards was generally well supported. Some representations expressed concern that closely connected settlements, such as Berryfields to the north, and Stoke Mandeville to the south, were excluded from this constituency.
949. There was general dissatisfaction with our proposals for Princes Risborough. Although some responses were supportive, and most counter proposals accepted that this was broadly the right area to accommodate the additional constituency, there was concern at the lack of a community of interest in this constituency, particularly from residents at its extremities. Our proposed split of the Chiltern Ridges ward was particularly unpopular, with residents in this ward arguing that it should be included in its entirety in Chesham and Amersham.
950. The inclusion of Hazlemere in Chesham and Amersham prompted a mixed response, and we received several counter proposals suggesting alternative constituencies for this ward – including Princes Risborough, in exchange for the remainder of the Chiltern Ridges ward, and Wycombe, in exchange for the Tylers Green and Loudwater ward, though neither of these counter proposals attracted more than modest support.
951. In the south of our proposed Chesham and Amersham constituency, the inclusion of the Beaconsfield ward was unpopular, as our proposals divided the Old Town (which is in the Gerrards Cross ward) from the majority of Beaconsfield itself. We received a counter proposal which suggested dividing the Gerrards Cross ward, including the majority of the ward in the Chesham and Amersham constituency, thus allowing the Beaconsfield ward, and the Old Town, to be included in the Marlow and South Buckinghamshire constituency.
952. Only a small number of representations were received concerning our proposed High Wycombe, and Marlow and South Buckinghamshire constituencies, though a number of issues were raised in opposition. Some residents of Marlow Bottom felt that they should be included in the same constituency as nearby Marlow, though this is not the case in the existing scheme of constituencies. We received multiple counter proposals which suggested that the High Wycombe constituency should be made more clearly urban by excluding the Chiltern Villages ward. The names of both constituencies also attracted a number of representations, particularly in the case of our proposed High Wycombe constituency, which many felt was an unnecessary change from the existing name of Wycombe.

### **Revised proposals**

953. In light of the representations received, our Assistant Commissioners recommended that we modify our initial proposals for Buckinghamshire.
954. Our Assistant Commissioners agreed that a constituency which crosses between the Buckinghamshire and Milton Keynes unitary authorities is unavoidable without breaching regional boundaries, and that our proposed Buckingham and Bletchley constituency was the most widely supported way of achieving this. Noting this, and the general support for the boundaries of our proposed Newport Pagnell and Milton Keynes constituencies, they recommended that we retain

the initial proposals for these three constituencies, though they did recommend Milton Keynes North and Milton Keynes South as more appropriate names for these constituencies.

955. Considering the numeric and geographic constraints, our Assistant Commissioners also agreed that the proposed Princes Risborough constituency should be retained in the revised proposals. They did not feel that amending the split of the Chiltern Ridges ward would meaningfully improve this constituency with respect to the statutory factors. They did acknowledge concern about the sprawling nature of this constituency, and particularly felt that the name Princes Risborough did not adequately reflect its full extent; however, they did not recommend a specific alternative as they did not feel that the representations received pointed to a clear choice that would command local support.
956. Our Assistant Commissioners considered the counter proposal to include the Hazlemere ward in the High Wycombe constituency, and the Tylers Green and Loudwater ward in the Chesham and Amersham constituency. Having visited the area, they felt that, while Hazlemere shares a greater affinity to High Wycombe than to Chesham, the affinity between Loudwater and High Wycombe is greater still, with Loudwater forming an integral part of the town. They therefore recommended that the initial proposals for High Wycombe be retained, though they agreed with representations which suggested that the name Wycombe was more reflective of the constituency as a whole.
957. Our Assistant Commissioners were persuaded by the evidence that our initial proposals divided the town of Beaconsfield. Noting the apparent connections between Chalfont St. Peter and Gerrards Cross, and the physical barrier of the M40 motorway to the south, they agreed that the town of Gerrards Cross would have a strong community of interest with the Chesham and Amersham constituency. They therefore recommended that we adopt a counter proposal to split the Gerrards Cross ward, including the majority of the ward in the Chesham and Amersham constituency, and including the remainder of the ward (the Beaconsfield Old Town area and the parish of Hedgerley), as well as the Beaconsfield ward, in the Marlow and South Buckinghamshire constituency. Regarding this latter constituency, our Assistant Commissioners recommended that the existing name, Beaconsfield, be retained, given that the revised constituency would contain all of the town.
958. We agreed with all of the recommendations of the Assistant Commissioners. Concerning the name of the proposed Princes Risborough constituency, we agreed that an alternative constituency name should be adopted for the revised proposals, and we felt that Mid Buckinghamshire was the name most likely to command local support. We therefore confirmed the initial proposals for the Buckingham and Bletchley, and Aylesbury constituencies, and the boundaries of the renamed Mid Buckinghamshire, Milton Keynes North, Milton Keynes South, and Wycombe constituencies. We proposed revisions to the boundaries of the proposed Beaconsfield and Chesham and Amersham constituencies, the former of which also with a name change.

### **Consultation on the revised proposals**

959. Our revision to the name of the proposed Milton Keynes North constituency was supported; however, the corresponding change to the proposed Milton Keynes South constituency attracted some opposition. Some responses argued that, as this proposed constituency includes the Central Milton Keynes ward, the name is potentially misleading, and a better name would be Milton Keynes Central, with the Buckingham and Bletchley constituency correspondingly being renamed as Milton Keynes South and Buckingham, or some variant thereof. More responses were

received opposing the pairing of Buckingham and Bletchley, but no new arguments or alternatives were advanced.

960. Again, only a small number of representations were made concerning the proposed Aylesbury constituency, although we did receive a new counter proposal which suggested including Stoke Mandeville and excluding the Buckingham Park area.
961. The proposed Mid Buckinghamshire constituency attracted more representations in opposition, with some explicitly saying that their concerns were not allayed by simply revising the name of this constituency. A small number of representations suggested that the extent of this constituency could be limited by extending the proposed Buckingham and Bletchley constituency south into the Grendon Underwood ward. A number of representations were again received from the Chiltern Ridges ward, in particular the Chartridge parish, in support of including a greater proportion, if not all, of the ward in the Chesham and Amersham constituency.
962. Our decision to retain the boundaries of the initial proposals for the Wycombe constituency drew a mixed response, though more supportive than opposing representations were received concerning the Tylers Green and Loudwater ward. We received multiple new counter proposals suggesting that the Chiltern Villages ward be excluded from this constituency in order to create a more compact constituency focused on High Wycombe.
963. The revisions we proposed to the south of the Chesham and Amersham constituency, affecting Beaconsfield and Gerrards Cross, were widely opposed. Responses noted that, just as the initial proposals divided Beaconsfield, the revised proposals divided the town of Gerrards Cross, a small part of which is included in the Denham ward. Around 400 representations were received in opposition to our proposals, with many recommending that we revert to the initial proposals for these two constituencies, including from residents of Knotty Green, an area to the north of Beaconsfield which is already in the existing Chesham and Amersham constituency. Set against these representations, however, we did note a not insignificant level of support for our revised proposals, including a small number from Gerrards Cross which emphasised connections to Chalfont St. Peter.

### **Final recommendations**

964. Having considered the evidence, we propose an amendment to the boundaries of our revised proposals for the Beaconsfield, and Chesham and Amersham constituencies. We acknowledge that our revised proposals divide the town of Gerrards Cross, part of which is included in the Denham ward. While we note that many representations requested that we revert to the initial proposals in this area, this would restore a division of Beaconsfield which we sought to resolve in our revised proposals. We also note that some representations suggested that there were good community ties between Gerrards Cross and Chalfont St. Peter, and that the inclusion of the town in the Chesham and Amersham constituency was sensible, notwithstanding the division of the town. We therefore propose to divide the Denham ward, including a single polling district in the Chesham and Amersham constituency – we note that this would unite the entire Gerrards Cross parish in a single constituency.
965. We also considered amending the northern boundary of the revised proposal for the Chesham and Amersham constituency. We noted that a greater area of the Chiltern Ridges ward, which we proposed dividing between the Chesham and Amersham, and Mid Buckinghamshire

constituencies, could be included in the Chesham and Amersham constituency; however, while we remain of the view that it is necessary to divide this ward to prevent the division of Chesham, we were not persuaded that similarly compelling reasons exist to extend this ward split to more rural areas of the ward. We consider that, while the parish of Chartridge could be included in the constituency, we remain of the view that doing so is likely to further break community ties in the area, particularly as it is not possible to include the entirety of the ward in the Chesham and Amersham constituency.

966. Finally, we have considered whether to amend the names of constituencies in the sub-region. We accept that our proposed Milton Keynes South constituency extends significantly further north than the existing constituency of the same name, and therefore we agree that Milton Keynes Central would be a more accurate name for this constituency, and have decided to adopt it as part of our final recommendations. We also feel, however, that Bletchley is sufficiently descriptive of the area of the Milton Keynes unitary authority that is in the Buckingham and Bletchley constituency, and as such we have retained this name in our final recommendations.
967. Our final recommendations in Buckinghamshire are therefore for constituencies of: Aylesbury; Beaconsfield; Buckingham and Bletchley; Chesham and Amersham; Mid Buckinghamshire; Milton Keynes Central; Milton Keynes North; and Wycombe. These constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.

## **East Sussex and West Sussex**

### **East Sussex**

#### **Initial proposals**

968. Of the eight existing constituencies in East Sussex (including the City of Brighton and Hove unitary authority), three are within the permitted electorate range (Brighton Pavilion, Hove, and Lewes), one is below the permitted range (Brighton Kemptown), and the remaining four are above (Bexhill and Battle, Eastbourne, Hastings and Rye, and Wealden). When formulating our initial proposals we decided that it would be beneficial to the pattern of constituencies as a whole for one constituency to contain parts of both East Sussex and West Sussex. We therefore proposed an East Grinstead and Uckfield constituency, the East Sussex portion of which was composed of wards from the west of the District of Wealden and the north of the District of Lewes.
969. We were able to propose minimal changes to the three constituencies in the City of Brighton and Hove. We proposed that Brighton Kemptown and Brighton Pavilion constituencies be changed only by transferring the Queen's Park ward from the former to the latter, and the Hanover and Elm Grove ward from the latter to the former. We retained the boundaries of the existing Hove constituency, though we proposed to rename this constituency Hove and Brighton West.
970. We proposed that the existing Hastings and Rye constituency be retained unchanged, other than to exclude the Brede & Udimore, and Sedlescombe & Westfield wards, and minor other changes to realign to new local government ward boundaries. As a result of these changes, we proposed that the Bexhill and Battle constituency did not extend as far west as the existing constituency does. Instead, we proposed that the area around Heathfield be included in a Hailsham and Crowborough constituency comprising most of the eastern parts of the District of Wealden.

971. As we proposed that areas in the north of the District of Lewes be included in the East Grinstead and Uckfield constituency, we proposed that the Lewes constituency should extend further east to include the areas of Stone Cross and Willingdon – this allowed us to propose an Eastbourne constituency that was coterminous with the local authority of the same name.

### **Consultation on the initial proposals**

972. We received a mixed response to our initial proposals for the City of Brighton and Hove. Though there was support for our approach of making minimal change to these three constituencies, and there was particular support for preserving their external boundaries, it was also felt that what changes we had proposed were more than was strictly necessary. Our proposed name for the Hove and Brighton West constituency was particularly unpopular, with many responses suggesting that Hove and Portslade would be a preferable alternative name if any change were necessary at all. We also received a counter proposal which suggested that, rather than exchanging the Queen's Park ward with the Hanover and Elm Grove ward, the latter could be split between Brighton Kemptown and Brighton Pavilion, thereby retaining the majority of both wards in their existing constituency. Some responses were also received which suggested that Peacehaven should be included in the name of the proposed Brighton Kemptown constituency to reflect the fact that this constituency extends beyond the city boundary.
973. Only a small number of responses were received concerning the proposed Hastings and Rye, and Bexhill and Battle constituencies, though the majority were supportive of the minor changes which we proposed to both. The majority of responses concerning the proposed Hailsham and Crowborough constituency were part of a campaign which broadly supported our proposals, but suggested that this constituency also include the Hartfield ward, and be called Sussex Weald.
974. The proposed Eastbourne constituency was positively received, though some objections were made by residents of the Lower Willingdon and Upper Willingdon wards. Those that recognised that some changes were necessary in order to bring the Eastbourne constituency into the permitted electorate range generally supported pairing these wards with Polegate in the proposed Lewes constituency.
975. The inclusion of wards to the north of Lewes in the East Grinstead and Uckfield constituency was strongly opposed. Respondents felt that villages such as Barcombe and Plumpton were strongly connected to Lewes and lacked any such connections to areas in the East Grinstead and Uckfield constituency. We received a counter proposal which suggested retaining these northern wards in the Lewes constituency, facilitated by alternative pairings of Hailsham and Uckfield, and East Grinstead and Crowborough as the constituency containing parts of East Sussex and West Sussex in this configuration.

### **Revised proposals**

976. In light of the representations received, our Assistant Commissioners recommended that we modify our initial proposals for East Sussex.
977. Our Assistant Commissioners agreed that the initial proposals for the City of Brighton and Hove were unnecessarily disruptive. They therefore recommended a counter proposal to split the Hanover and Elm Grove ward between Brighton Kemptown and Brighton Pavilion, and include the entire Queen's Park ward in the Brighton Kemptown constituency. They also considered seeking



views on the exact boundary of the split ward would be valuable during the consultation on the revised proposals.

978. The Assistant Commissioners felt that the name Hove and Brighton West was clearly unsatisfactory, and they therefore recommended the alternative name Hove and Portslade as the most likely to command local support. The Assistant Commissioners also considered recommending renaming the Brighton Kempton constituency to Brighton Kempton and Peacehaven; however, they did not feel that sufficient evidence had been received to recommend this change.
979. It was also accepted by our Assistant Commissioners that the ties of the Hartfield ward were closer to the Hailsham and Crowborough constituency than the East Grinstead and Uckfield constituency. They therefore recommended that we transfer the Hartfield ward, and also amended the name of the Hailsham and Crowborough constituency to Sussex Weald.
980. Our Assistant Commissioners also considered making changes to the Lewes constituency to address concerns raised in consultation. Although they acknowledged that wards to the north of Lewes clearly share strong ties to the town, they were not persuaded that any counter proposal received would better reflect the statutory factors. They therefore recommended we retain the initial proposals for the Lewes constituency.
981. We agreed with all of the recommendations of the Assistant Commissioners, and therefore we confirmed the initial proposals for the constituencies of: Bexhill and Battle; East Grinstead and Uckfield; Eastbourne; Hastings and Rye; and Lewes. We proposed changes to the boundaries of the proposed constituencies of: Brighton Kempton; Brighton Pavilion; East Grinstead and Uckfield; and Hailsham and Crowborough. We also proposed that the Hailsham and Crowborough, and Hove and Brighton West constituencies be renamed Sussex Weald, and Hove and Portslade, respectively.

### **Consultation on the revised proposals**

982. Our revised proposals for the City of Brighton and Hove were generally well received. In our revised proposals report, we suggested that the split of the Hanover and Elm Grove ward could be adjusted further to align to the Queen's Park Road, which representations had suggested was a natural topographical boundary – this suggestion was supported by several representations. We also requested representations on the subject of whether or not to change the name of the proposed Brighton Kempton constituency to Brighton Kempton and Peacehaven. Again, responses we received on this question were largely supportive, as were responses to our revised name for the proposed Hove and Portslade constituency.
983. We did not receive any substantively new representations concerning the proposed Bexhill and Battle, Eastbourne, and Hastings and Rye constituencies. A small number of representations were received supporting our revisions to the Sussex Weald constituency.
984. We received more than 400 responses objecting to our proposed Lewes constituency, far more than in the initial proposals consultation. These responses largely came from the following wards, which we proposed be included in the East Grinstead and Uckfield constituency: Chailey; Barcombe & Hamsey; Ditchling & Westmeston; and Plumpton, Streat, East Chiltington & St. John. We received a counter proposal that returned the latter two wards to the Lewes constituency, and

transferred the Buxted ward from the East Grinstead and Uckfield constituency to the Sussex Weald constituency. Another counter proposal replicated this proposal, but also included the Chailey, Barcombe & Hamsey ward in Lewes, achieved by transferring the Hartfield ward from Sussex Weald to East Grinstead and Uckfield, thereby undoing a change made at the revised proposals stage. Both proposals additionally proposed that the Sussex Weald constituency include the Arlington ward, and the Bexhill and Battle constituency include the Stone Cross ward.

### **Final recommendations**

985. Having considered the evidence, we propose changes to our revised proposals for East Sussex. We accept that the topography of Brighton shapes community ties on either side of Queen's Park Road, and as such we have adjusted our split of the Hanover and Elm Grove ward to align the boundary between the Brighton Kemptown and Brighton Pavilion constituencies to this road. We are also persuaded that Brighton Kemptown and Peacehaven would be a more appropriate name, recognising that this constituency extends considerably beyond the boundary of Brighton.
986. We also note the large numbers of objections to our revised proposals for the Lewes constituency. Any solution to the concerns in this area would necessitate the transfer of the Buxted ward to the East Grinstead and Uckfield constituency, and we also note several representations which suggested making this change independently of concerns about Lewes – we have therefore proposed it as part of our final recommendations. We further noted counter proposals which suggested that the Arlington ward be transferred to the Sussex Weald constituency, and the Stone Cross ward be transferred to the Bexhill and Battle constituency; however, we have not recommended these changes be made, as, unlike in the case of Buxted, there is little evidence in representations that such a change would be welcome, and these changes are not necessary to address the substantive issue, namely the exclusion of wards north of Lewes from the Lewes constituency.
987. We accept that the ties of the following three wards are to Lewes, and note that they are part of the existing Lewes constituency: Ditchling & Westmeston; Plumpton, Streat, East Chiltington & St. John; and Chailey, Barcombe & Hamsey. However, it is not possible to retain this arrangement without reverting to our initial proposals for the Sussex Weald/Hailsham and Crowborough constituency, which we did not feel was justified, given the response to that constituency across all consultation periods. We therefore considered what subset of wards could be included in the Lewes constituency in order to best address the concerns raised.
988. We note that either the Ditchling & Westmeston, and the Plumpton, Streat, East Chiltington & St. John wards, or the Chailey, Barcombe & Hamsey ward, could be included in the Lewes constituency, but either solution creates an issue of poor internal connectivity. However, on balance, we have decided on the former as our final recommendation. We are aware that the connecting roads between these two wards and Lewes run through the south of the Chailey, Barcombe & Hamsey ward, which we are retaining in the proposed East Grinstead and Uckfield constituency, or briefly through the Brighton Pavilion constituency in the Stanmer area. We acknowledge that this is not an ideal arrangement; however, we feel that the A272 and A275 road links in the Chailey, Barcombe & Hamsey ward are far stronger than the links that would otherwise connect the other two wards to the East Grinstead and Uckfield constituency. Serious consideration was given as to whether it would be appropriate to split the Chailey, Barcombe & Hamsey ward in order to resolve this geographic anomaly; however, we ultimately decided

that a number of other constituencies across the country have similar issues regarding road connections. In this instance our view is that there would be no wider benefits from the proposed splitting of a ward, and therefore, in keeping with our policy, we did not feel splitting the Chailey, Barcombe & Hamsey ward was appropriate. Therefore, we propose that the Ditchling & Westmeston, and Plumpton, Streat, East Chiltington & St. John wards should be included in our proposed Lewes constituency as part of our final recommendations.

989. Our final recommendations in East Sussex are therefore for constituencies of: Bexhill and Battle; Brighton Kempdown and Peacehaven; Brighton Pavilion; Eastbourne; East Grinstead and Uckfield; Hastings and Rye; Hove and Portslade; Lewes; and Sussex Weald. These constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.

## **West Sussex**

### **Initial proposals**

990. Of the eight existing constituencies in West Sussex, two are within the permitted electorate range (Crawley, and East Worthing and Shoreham), and the remaining six are all above (Arundel and South Downs; Bognor Regis and Littlehampton; Chichester; Horsham; Mid Sussex; and Worthing West). We retained the Crawley constituency wholly unchanged in the initial proposals.
991. As discussed above, we proposed that the East Grinstead and Uckfield constituency contain parts of both East Sussex and West Sussex. The West Sussex portion of this constituency comprised ten wards in the north of the District of Mid Sussex, the remainder of which we proposed be included in the Mid Sussex constituency. We proposed that the Horsham constituency contain only wards from the District of Horsham, and therefore our proposals for this constituency extended it slightly further south-east than the existing constituency, to include the Cowfold, Shermanbury & West Grinstead ward.
992. As it was necessary for the remaining five constituencies in West Sussex to have a very high average electorate, substantial changes to the existing pattern of constituencies was necessary. In particular, we decided to propose Arundel and Littlehampton, and Shoreham constituencies which combined coastal areas with areas of the South Downs. We also proposed a Worthing constituency which contained the majority of the Borough of Worthing.
993. We proposed a Bognor Regis constituency which extended to the west to include the North Mundham & Tangmere, Selsey South, and Sidlesham with Selsey North wards. Other than these wards, and the Fittleworth ward which we proposed in the Arundel and Littlehampton constituency, we proposed that the Chichester constituency contain the remainder of the District of Chichester.

### **Consultation on the initial proposals**

994. Our proposed East Grinstead and Uckfield, and Mid Sussex constituencies attracted a mixed response. As elsewhere in the South East region, there was opposition to the principle of constituencies containing parts of more than one administrative county, though some representations noted that East Grinstead was historically part of East Sussex. Our proposal to extend the Mid Sussex constituency further south to incorporate Hassocks and Hurstpierpoint

was well received, with respondents commenting that this arrangement would be an improvement on the existing pattern of constituencies, which includes these towns in the Arundel and South Downs constituency. Responses from the north of the proposed Mid Sussex constituency were more negative, particularly from the rural wards of Ardingly and Balcombe, and High Weald. We received a counter proposal to include these wards in the Mid Sussex constituency, and instead transfer the Hassocks ward to the East Grinstead and Uckfield constituency.

995. We received a small number of representations concerning the proposed Crawley and Horsham constituencies, but those comments we did receive were broadly positive. The remaining five constituencies in West Sussex collectively attracted more than 1,300 representations, the vast majority of which were in opposition to our proposals. The pairing of the built-up coastal conurbation with areas of the South Downs in the Arundel and Littlehampton, and Shoreham constituencies was particularly unpopular. Responses (particularly from the Pulborough, Coldwaltham & Amberley, Storrington & Washington, and West Chiltington, Thakeham & Ashington wards) expressed a strong preference for being included in a single constituency focused on the South Downs.
996. The inclusion of the North Mundham & Tangmere, Selsey South, and Sidlesham with Selsey North wards in the Bognor Regis constituency was also vehemently opposed, on the grounds that the initial proposals broke local ties on the Manhood Peninsula. Responses from these wards emphasised a strong preference for retaining existing links to the Chichester constituency.
997. The proposed Worthing constituency received a mixed response. While some responses were supportive of the idea of including the majority of the Worthing borough in a single constituency, some responses noted that including the Cokeham and Peverel wards in this constituency meant that the Adur District was unnecessarily divided, and also that two Worthing Borough wards needed to be excluded from the proposed Worthing constituency rather than one.
998. We received several counter proposals concerning the constituencies in this area. Some counter proposals made relatively limited suggestions, such as transferring the Pulborough, Coldwaltham & Amberley, and Storrington & Washington wards to the Arundel and Littlehampton constituency; the Cokeham, Peverel, and Offington wards to the Shoreham constituency; and the Salvington ward to the Worthing constituency. Others proposed a more substantial reconfiguration of constituencies in West Sussex, with the aim of better reflecting the existing constituencies.

### **Revised proposals**

999. In light of the representations received, our Assistant Commissioners recommended that we modify our initial proposals for West Sussex.
1000. Our Assistant Commissioners noted that the response to the Crawley and Horsham constituencies was broadly positive, and therefore recommended that the initial proposals be retained for these constituencies. They considered recommending that the Ardingly and Balcombe, and High Weald wards be included in the Mid Sussex constituency; however, they did not feel that including the Hassocks ward in East Grinstead and Uckfield would be an acceptable consequence of taking this proposal forward. They therefore also recommended that we retain the initial proposals for the Mid Sussex constituency, and the West Sussex portion of the East Grinstead and Uckfield constituency.

1001. The large response to our initial proposals for the Arundel and South Downs, Bognor Regis, Chichester, Shoreham, and Worthing constituencies was noted, and it was felt by our Assistant Commissioners that significant revisions to these constituencies were necessary to reflect the level of concern raised in consultation. Our Assistant Commissioners considered that the two salient issues were the division of the Manhood Peninsula, and the need to restore a single constituency containing the majority of the rural South Downs; however, they felt that no counter proposal successfully resolved both issues without introducing unacceptable new issues.
1002. Drawing on ideas from several counter proposals, the Assistant Commissioners recommended their own proposal for these constituencies. This proposal retained the existing East Worthing and Shoreham constituency unchanged, and restored the existing pairing of Bognor Regis and Littlehampton, and now also included the town of Rustington in this constituency. The Arundel and South Downs constituency recommended in this scheme extended further west than the existing constituency to include wards in the north of the Chichester district. In order to keep all proposed constituencies within the permitted electorate range, the Assistant Commissioners proposed splits of the Goodwood and Felpham East wards.
1003. We agreed with all of the recommendations of the Assistant Commissioners, and therefore we confirmed the initial proposals for the Crawley, Horsham, and Mid Sussex constituencies, and the West Sussex portion of the East Grinstead and Uckfield constituency. We made revised proposals for the constituencies of: Arundel and South Downs; Bognor Regis and Littlehampton; Chichester; East Worthing and Shoreham; and Worthing West.

### **Consultation on the revised proposals**

1004. During the revised proposals consultation phase, we received around 200 representations concerning the Ardingly and Balcombe, and High Weald wards, far more than in the earlier consultation phases. The counter proposal to include these wards in the Mid Sussex constituency, and instead include the Hassocks ward in the East Grinstead and Uckfield constituency was again advanced, though this was also explicitly opposed by a number of other representations. We received very few new representations concerning the proposed Crawley and Horsham constituencies.
1005. The remaining five constituencies in West Sussex again attracted the largest response of anywhere in the South East region, more than 1,000 representations in total. Our revised proposal to retain the East Worthing and Shoreham constituency wholly unchanged received a mixed response. While we received several representations which expressed support for this constituency having a singularly coastal focus, we received a surprising number of representations which suggested returning to a pattern of constituencies similar to the initial proposals. Responses to our proposed Worthing West constituency mainly focused on opposition to the inclusion of the rural Angmering & Findon ward, which many felt was more suited to the Arundel and South Downs constituency.
1006. The response to our revised Arundel and South Downs constituency was highly positive from residents of the existing constituency; however, this was offset by considerable opposition to the revised Chichester constituency. Respondents suggested that the Easebourne, Fernhurst, Harting, and Midhurst wards do not have a shared community of interest with the rest of the South Downs. Our proposal to split the Goodwood ward was unpopular, particularly as it divided

the Goodwood estate between two constituencies. Many representations suggested that Pagham and Bersted wards would be a poor fit in the Chichester constituency.

1007. We again received a number of counter proposals for these constituencies. These proposals differed in a number of ways, but broadly agreed that the Chichester constituency should contain additional wards to the north, including some or all of the Eastbourne, Goodwood, Harting, and Midhurst wards, and that the Bognor Regis and Littlehampton constituency should contain the Bersted and Pagham wards. Several of these proposals made alternative suggestions for split wards, including some which deviated from polling district boundaries.

### **Final recommendations**

1008. Having considered the evidence, we are not recommending changes to our proposals for Arundel and South Downs, Bognor Regis and Littlehampton, Chichester, and Worthing West. We note that, as in earlier consultation phases, the number of responses to our revised proposals for these constituencies were among the highest in the region, and very serious consideration was given to the possibility of making changes in our final recommendations. We therefore considered counter proposals received and also investigated our own alternative proposals that might resolve the objections received. We identified a counter proposal which would resolve some of the objections received, but required the inclusion of part of the Yapton ward in the Arundel and South Downs constituency. We noted that Yapton was not presently included in such a constituency. Furthermore, we identified that either East Preston or Rustington would need to be divided in order to reduce the electorate of the Worthing West constituency. We considered these alternatives would also break community ties, particularly as the best alternative we identified required dividing Rustington along the main shopping area, which we considered would break community ties.

1009. We note the objections to our proposals from the rural wards to the north of Chichester, though we respectfully disagree that this area lacks ties to the rest of the proposed Arundel and South Downs constituency. We feel that there are good road links via the A272, and, having visited the area, we noted that these wards are of a similar character to other South Downs wards – indeed, the South Downs National Park is headquartered in Midhurst. We also considered whether the Goodwood Estate, which is divided under our revised proposals, constituted a special geographic consideration, which would convince us of the need to revise our proposals. Though we note from the representations received on this topic that the Estate is clearly a focus of local identity, we do not agree that any particular representational challenges arise as a result of its division between constituencies. Rather, we feel that our proposed division of the Goodwood ward, which runs through a very sparsely populated part of the Estate, avoids the need to split wards in coastal areas, which would more obviously divide communities.

1010. We also considered whether the inclusion of the Pagham and Bersted wards in the Chichester constituency should be revised, particularly given that several counter proposals received agreed that these wards should be included in the Bognor Regis and Littlehampton constituency. We note the many representations that stated these wards are closely tied to Bognor Regis, and, having visited the area, we agree with this assessment; however, we also note that this argument was advanced largely by residents of Chichester, rather than Pagham and Bersted residents themselves, from whom very few representations were received. Given this relative lack of objection, we feel that, although our proposals do break ties between these wards and Bognor

Regis, this is preferable to breaking ties elsewhere along the coast of West Sussex, which would inevitably arise from including these wards in Bognor Regis and Littlehampton. Finally, in light of the objections received, we reconsidered our proposal to include the Angmering & Findon ward in the Worthing West constituency. Although again we accept that this ward is of a more similar character to the rural South Downs than the coastal conurbation, we feel that the alternatives, namely to disrupt the otherwise wholly unchanged East Worthing and Shoreham constituency, or to divide the town of Rustington, are less preferable than retaining our revised proposals.

1011. We considered again whether changes could be made to the boundary between the East Grinstead and Uckfield, and Mid Sussex constituencies. While we acknowledge that community ties in the Mid Sussex district are broken by the necessity of a constituency that contains parts of West Sussex and East Sussex, particularly in places such as Handcross at the extremity of the Ardingly and Balcombe ward, we note the broad support for the Mid Sussex constituency, and correspondingly the lack of evidence that the Hassocks ward would be a better fit in the East Grinstead and Uckfield constituency than areas in the north of the Mid Sussex district.

1012. Our final recommendations in West Sussex are therefore for constituencies of: Arundel and South Downs; Bognor Regis and Littlehampton; Chichester; Crawley; East Worthing and Shoreham; Horsham; Mid Sussex; and Worthing West. These constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.

## **Isle of Wight**

### **Initial proposals**

1013. As set out in the legislation, the Isle of Wight is specifically allocated two whole constituencies, which do not have to be within the permitted electorate range. While it is not stipulated that the two constituencies must have similar sized electorates, we considered that it would be a sound principle to seek to divide the island's electors broadly equally when formulating our initial proposals.

1014. We considered various options for the Isle of Wight, and concluded that a division of the island into East and West would be most likely to command local support. We therefore proposed East Isle of Wight and West Isle of Wight constituencies, a key feature of which was the use of the River Medina as a natural boundary in the north of the island.

### **Consultation on the initial proposals**

1015. During consultation on the initial proposals, the principle of dividing the Isle of Wight on an east/west basis was broadly supported. We did receive a counter proposal which suggested a north/south division, broadly aligning with the former Medina and South Wight local authorities; however, we also received several responses opposing this approach.

1016. Our proposed boundary between the two constituencies, however, was unpopular. Responses said there was a strong community of interest between Cowes and East Cowes, despite the boundary of the River Medina, and some also noted that including the Fairlee & Whippingham ward in the proposed East Isle of Wight constituency divided the town of Newport, the largest settlement in the West Isle of Wight constituency.

1017. Several respondents submitted an identical counter proposal, which suggested including the East Cowes, Fairlee & Whippingham, and Osborne wards in the West Isle of Wight constituency, and the Newchurch, Havenstreet & Ashe, Ventnor & St Lawrence, and Wroxall, Lowtherville & Bonchurch wards in the East Isle of Wight constituency. We received many other responses endorsing this counter proposal.

1018. As well as dissatisfaction with our proposed boundary on the Isle of Wight, we also received representations concerning the names of the two constituencies. We received a number of suggestions, though by far the most common was to use the compass point indicators as suffixes rather than prefixes, and thus call the constituencies Isle of Wight East and Isle of Wight West.

### **Revised proposals**

1019. In light of the representations received, our Assistant Commissioners recommended that we modify our initial proposals for the Isle of Wight.

1020. Noting that several respondents had independently arrived at the same counter proposal, and the widespread support it received in other representations, our Assistant Commissioners recommended including the East Cowes, Fairlee & Whippingham, and Osborne wards in the western constituency, and the Newchurch, Havenstreet & Ashe, Ventnor & St Lawrence, and Wroxall, Lowtherville & Bonchurch wards in the eastern constituency. They also felt that Isle of Wight West and Isle of Wight East would be more appropriate names for these two constituencies than those initially proposed.

1021. We agreed with these recommendations from Assistant Commissioners, and therefore made revised proposals for Isle of Wight East and Isle of Wight West constituencies.

### **Consultation on the revised proposals**

1022. We note that by far the most frequently made point in the revised proposals consultation was opposition to the principle of dividing the island in two constituencies; however, as the legislation stipulates that two constituencies must be allocated to the Isle of Wight, we are unable to address this concern.

1023. Those that commented specifically on our proposed constituencies were broadly supportive of our revised proposals. We received three counter proposals during this consultation phase, including one which suggested that we revert to the initial proposals, and another which proposed an alternative north/south division of the island.

### **Final recommendations**

1024. In light of the broad support for our revised proposals, we are not recommending any changes to the boundaries of our revised proposals for the Isle of Wight. Our final recommendations are therefore for constituencies of Isle of Wight East and Isle of Wight West. These constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.



## Kent

### Initial proposals

1025. Of the 17 existing constituencies in Kent, ten are within the permitted electorate range, and the remaining seven are all above the permitted range: Ashford; Canterbury; Dartford; Folkestone and Hythe; Rochester and Strood; Sittingbourne and Sheppey; and Tonbridge and Malling. Under our initial proposals, we proposed two constituencies, Gillingham and Rainham, and Gravesham, to be wholly unchanged from their existing configurations, and two further constituencies, Canterbury, and Dover and Deal to be changed only to realign with changes to local government wards, though we did amend the name of the latter to recognise that the two towns are similarly sized.
1026. We additionally recommended three constituencies with minimal changes to remain wholly within their existing boundaries. We proposed a Rochester and Strood constituency which excluded the Rochester South and Horsted ward, a Sittingbourne and Sheppey constituency which excluded the West Downs, and Teynham and Lynsted wards, and a Tunbridge Wells constituency which excluded the Hawkhurst and Sandhurst ward, but all three were otherwise unchanged from their existing configurations.
1027. As the existing Dartford constituency was above the permitted electorate range, we proposed that the Darenth and the Wilmington, Sutton-at-Hone & Hawley wards be included in the proposed Sevenoaks constituency, and that the Hartley and Hodsoll Street ward be included in the proposed Tonbridge constituency. We additionally proposed that the Ash and New Ash Green ward be transferred from the existing Sevenoaks constituency to the proposed Tonbridge constituency.
1028. We proposed to pair the towns of Maidstone and Malling in a single constituency. This configuration necessitated the inclusion of the Aylesford South and Ditton wards from the existing Chatham and Aylesford constituency, which was otherwise changed only by the inclusion of the Rochester South and Horsted ward.
1029. The allocation of 18 constituencies to Kent meant that it was necessary to propose a constituency without an obvious predecessor. We proposed that this constituency comprise the majority of the rural area of the Ashford local authority, as well as areas in the south of the Maidstone local authority, and in the east of the Tunbridge Wells local authority, to be called Weald of Kent. As four wards from the existing Faversham and Mid Kent constituency were proposed to be transferred to the Weald of Kent constituency, we proposed to balance the electorate of the proposed Faversham and Mid Kent constituency by including the Charing, Downs North, and Downs West wards, as well as the Teynham and Lynsted, and West Downs wards discussed above.
1030. As a consequence of our initial proposals for Faversham and Mid Kent, and Weald of Kent, it was necessary to reorientate the existing Ashford constituency. We proposed that this constituency should extend east from the town of Ashford to include the wards of Bircholt, North Downs West, and North Downs East. Other than the transfer of these three wards to the proposed Ashford constituency, and the transfer of the Saxon Shore ward to the proposed Weald of Kent constituency, our proposed Folkestone and Hythe constituency was unchanged from the existing constituency.

1031. Although both the existing North Thanet and South Thanet constituencies are within the permitted electorate range, changes to local government boundaries in the Canterbury local authority meant that it is not possible to retain the existing constituencies without splitting wards. We therefore proposed a compact East Thanet constituency, including the wards of Dane Valley, Margate Central, and Salmestone, and a rural West Thanet constituency including the wards of Little Stour & Ashstone, and Sandwich.

### **Consultation on the initial proposals**

1032. During the initial proposals consultation, our proposals to retain the existing Gravesham, and Gillingham and Rainham constituencies were received favourably, with the latter in particular attracting a sizeable petition in support of our proposals. Our proposals for only minor changes to the Dover and Deal, and Sittingbourne and Sheppey constituencies were similarly well received, with particular support for our proposed name in the former case.

1033. Our proposed Canterbury constituency was well received other than by the residents of the Sturry ward, which we proposed be included in the West Thanet constituency. Residents of this ward argued that their community and local government ties are much closer with Canterbury than with Thanet. Other issues were raised concerning the proposals for West Thanet, including a lack of physical and community connectivity between the north and east Kent coasts, and the fact that such a constituency would contain parts of three local authorities. Our proposed East Thanet constituency, however, was received much more positively, with some comments suggesting that our proposals represented an improvement on the existing configuration, which divides Margate between constituencies. We received a counter proposal which suggested exchanging the Margate Central and Dane Valley wards for the Little Stour & Ashstone, and Sandwich wards, which would restore the existing north/south configuration of constituencies in Thanet, with Salmestone being the only whole ward in a different constituency compared with the existing configuration.

1034. Our proposal to exclude the Rochester South and Horsted ward from the Rochester and Strood constituency, and include this ward in Chatham and Aylesford, drew a mixed response. While some agreed with our initial proposals that this ward is the best to remove to bring the Rochester and Strood constituency within the permitted range, we also received a counter proposal that suggested that the River ward would be a better alternative to limit the division of Rochester. We received arguments for and against both propositions during the initial consultation phase.

1035. We received a small number of representations concerning the proposed Dartford, Sevenoaks, and Tonbridge constituencies, but those we did receive generally opposed our proposals. Most strongly opposed was the inclusion of the Darenth, and Wilmington, Sutton-at-Hone & Hawley wards in the proposed Sevenoaks constituency – respondents noted that the former could be retained in the Dartford constituency without requiring consequential changes, and a counter proposal received proposed splitting the latter to retain as much within the Dartford constituency as possible. Similarly, respondents from the Ash and New Ash Green, and Hartley and Hodsoll Street wards expressed a preference for being included in the Sevenoaks constituency instead of the proposed Tonbridge constituency, even though the latter is not part of the existing Sevenoaks constituency.

1036. There was also a mixed but mostly negative response to our proposed Maidstone and Malling constituency. While a minority of supportive representations suggested there were strong links

between the two towns, a greater number suggested that the former has closer ties to areas such as Bearsted to the east, and the latter has a more rural focus, and thus should remain connected with Tonbridge, as in the existing scheme of constituencies.

1037. The proposed Weald of Kent constituency was generally well received, except for the inclusion of the Hawkhurst and Sandhurst ward, which a small number of respondents felt disrupted the existing Tunbridge Wells constituency unnecessarily. We received a number of counter proposals suggesting wards which could be added to the Weald of Kent constituency from the proposed Faversham and Mid Kent constituency, in order to allow the existing Tunbridge Wells constituency to be retained wholly unchanged. One such proposal was to include the Charing, and Downs West wards in the Weald of Kent constituency, and the Downs North ward in the Ashford constituency, given that the response to including these wards in the initially proposed Faversham and Mid Kent constituency was broadly negative.

1038. Almost all the responses received concerning our proposed Ashford, and Folkestone and Hythe constituencies came from the North Downs East and North Downs West wards, and were universally negative. Such representations argued that settlements such as Hawkinge are closely tied to Folkestone and have no community of interest with Ashford.

### **Revised proposals**

1039. In light of the representations received, our Assistant Commissioners recommended that we modify our initial proposals for Kent.

1040. Our Assistant Commissioners agreed that the initial proposals unnecessarily disrupted the Tunbridge Wells constituency, which could have been proposed wholly unchanged. They therefore recommended we include the Hawkhurst and Sandhurst ward in the Tunbridge Wells constituency, and the Charing, Downs North, and Downs West wards in the Weald of Kent constituency. The Assistant Commissioners considered whether further changes to the Weald of Kent constituency could be recommended to alleviate the concerns raised about the inclusion of the North Downs East and North Downs West ward in the proposed Ashford constituency. However, they concluded that, despite the opposition received, the initial proposals were the best way of sufficiently reducing the electorate of the Folkestone and Hythe constituency.

1041. Consideration was also given as to whether or not to recommend changes to our initial proposals for constituencies in Thanet. Our Assistant Commissioners noted that it would be possible to retain the existing north/south division of these two constituencies; however, they felt that the resulting division of Margate would be unacceptable given the positive representations received concerning the East Thanet constituency. They therefore recommended retaining the initial proposals for East and West Thanet, though they did recommend that we adopt the name Herne Bay and Sandwich to reflect both coastlines of this proposed constituency.

1042. Our Assistant Commissioners noted the several objections to the proposed Dartford, Sevenoaks, and Tonbridge constituencies; however, they considered that it would not be possible to meaningfully improve these constituencies with respect to the statutory factors without disrupting the neighbouring Gravesham constituency, which was proposed both unchanged from the existing constituency and coterminous with the Borough of Gravesend. In particular, they did not feel that there was justification for splitting wards in this area. They therefore recommended that the initial proposals be retained for these constituencies. Although the Assistant Commissioners

noted concern over the exclusion of the Rochester South and Horsted ward from the Rochester and Strood constituency, they did not feel that including the River ward in Chatham and Aylesford instead would address concerns over the division of Rochester. They therefore recommended that the initial proposals be retained for these constituencies too.

1043. We agreed with all of the recommendations of the Assistant Commissioners, and therefore we confirmed the initial proposals for fourteen constituencies in Kent, and the boundaries of the West Thanet constituency, though we proposed the name of this constituency be revised to Herne Bay and Sandwich. We proposed revisions to the boundaries of three proposed constituencies (Faversham and Mid Kent, Tunbridge Wells, and Weald of Kent).

### **Consultation on the revised proposals**

1044. Our revisions to the proposed Faversham and Mid Kent and Weald of Kent constituencies attracted very few representations, though there was some support for our revised proposal to retain the existing Tunbridge Wells constituency wholly unchanged. We received a small number of representations suggesting that the Leeds ward be included in Faversham and Mid Kent instead of Weald of Kent, in order to better reflect the existing pattern of constituencies.

1045. The proposed East Thanet, and Herne Bay and Sandwich constituencies again drew a mixed response, the former being broadly well received and the latter largely opposed, with little sense that the name change which we proposed to the latter constituency had meaningfully alleviated concerns about its lack of internal connectivity. We received an amended counter proposal which proposed retaining the existing North Thanet and South Thanet constituencies unchanged except for small changes to realign to new local government ward boundaries. This proposal included a split of the Sturry ward, including the area south of the railway line in the Canterbury constituency. The breaking of ties between Sturry and Canterbury attracted a small number of representations in opposition to our proposals, as it had in the initial consultation phases. No new representations were received concerning the proposed Dover and Deal constituency.

1046. As in the consultation on our initial proposals, the overwhelming majority of responses concerning the proposed Ashford, and Folkestone and Hythe constituencies concerned the inclusion of the North Downs West and North Downs East wards in the former rather than the latter constituency. We received a new counter proposal which suggested retaining the northern part of the existing Folkestone and Hythe constituency unchanged by including the New Romney, Romney Marsh, and Walland & Denge Marsh wards in the Ashford constituency.

1047. Our decision to retain the initial proposals for the Chatham and Aylesford, Gillingham and Rainham, Gravesham, Rochester and Strood, and Sittingbourne and Sheppey constituencies was broadly supported by the small number of responses we received concerning these constituencies.

1048. We received additional representations concerning the proposed Dartford, Sevenoaks, and Tonbridge constituencies, largely restating arguments made during consultation on the initial proposals. Although we did not propose any changes to our initial proposals for the Maidstone and Malling constituency, this constituency attracted a higher proportion of responses in the revised proposals consultation than previously. We received nearly 100 representations from the Kings Hill and Watlington wards which suggested that community ties would be broken if the existing connection between this area and Tonbridge were to be ended.

1049. Several counter proposals were received during the revised proposals consultation which suggested changes to our proposals in West Kent, including restating of counter proposals advocated during consultation on the initial proposals. Two different counter proposals suggested that the Darenth and the Wilmington, Sutton-at-Hone & Hawley wards could be included in the Dartford constituency, and the Ash and New Ash Green, and Hartley and Hodsoll Street wards could be included in the Sevenoaks constituency by including the Ebbsfleet ward in the Gravesham constituency, though these proposals disagreed on the consequential changes necessary for all constituencies to be within the permitted range. It was also noted that the Wateringbury ward could be included in the Tonbridge constituency with no other changes required, and that the Kings Hill ward could also be included in Tonbridge if wider changes were made.

### **Final recommendations**

1050. Having considered the evidence received, we propose changes to our revised proposals for Kent. We noted that it may be possible to address concerns with our proposed Dartford, Sevenoaks, and Tonbridge constituencies; however, resolving these issues required the inclusion of the Ebbsfleet ward in the Gravesham constituency. We had concerns with this proposal given Ebbsfleet had clear ties to Dartford and that it modified the unchanged Gravesham constituency which had been supported during the consultation periods. We noted, however, that the Darenth and Wateringbury wards could be included in the Dartford and Tonbridge constituencies respectively, without further changes to the pattern of constituencies. We therefore recommend both these changes, affecting the Dartford, Sevenoaks, Tonbridge, and Maidstone and Malling constituencies.

1051. We accept that including the Leeds ward in the Faversham and Mid Kent constituency, rather than in Weald of Kent, would better reflect the existing pattern of constituencies, and so we have also accepted this counter proposal in our final recommendations.

1052. We strongly considered dividing the Sturry ward in order to recommend that the existing North Thanet and South Thanet constituencies be retained with only minimal changes. We acknowledge that doing so would better reflect the existing pattern of constituencies; however, we also note that the revised proposals for the Canterbury and East Thanet constituencies have been broadly well received. While we recognise that there may be a lack of community ties between the Little Stour & Ashstone, and Sandwich wards and the rest of the proposed Herne Bay and Sandwich constituency, we are unpersuaded that this is a sufficient concern to justify dividing the Sturry ward. We have therefore confirmed our revised proposals for Canterbury, East Thanet, and Herne Bay and Sandwich as our final recommendations.

1053. Our final recommendations in Kent are therefore for constituencies of: Ashford; Canterbury; Chatham and Aylesford; Dartford; Dover and Deal; East Thanet; Faversham and Mid Kent; Folkestone and Hythe; Gillingham and Rainham; Gravesham; Herne Bay and Sandwich; Maidstone and Malling; Rochester and Strood; Sevenoaks; Sittingbourne and Sheppey; Tonbridge; Tunbridge Wells; and Weald of Kent. These constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.

## Oxfordshire

### Initial proposals

1054. All six existing constituencies in Oxfordshire are above the permitted electorate range, and therefore it is not possible to retain any constituency wholly unchanged. In our initial proposals, we were, however, able to propose two constituencies with only minor changes from their existing configurations. The boundaries of our proposed Henley and Oxford East constituencies were realigned to new local government boundaries: the former no longer included the Launton & Otmoor, and the Sandford & the Wittenhams wards, and the latter additionally no longer included the Holywell ward, but were otherwise unchanged in our initial proposals.
1055. The size of the electorates in the towns of Banbury and Bicester are such that it is no longer possible to include both in the same constituency. We therefore proposed separate Banbury and Bicester constituencies, each containing parts of the District of Cherwell and District of West Oxfordshire. As a consequence, we proposed that the Witney constituency, which is currently coterminous with the District of West Oxfordshire, extend further south to include five wards from the District of Vale of White Horse.
1056. As a result of the transfer of these wards, and some minor changes to realign to local government boundaries, the existing Wantage constituency could be brought within the permitted electorate range. We therefore proposed this constituency, although we proposed that it be called Didcot and Wantage to reflect the name of the larger settlement, and that the Marcham ward be transferred to our proposed Oxford West and Abingdon constituency, to balance the loss of the Kidlington wards in the north to the proposed Bicester constituency.

### Consultation on the initial proposals

1057. By far the greatest response to our initial proposals for Oxfordshire concerned our proposals for the Bicester constituency. Respondents from the West Oxfordshire component of this constituency, particularly the Eynsham and Cassington, Freeland and Hanborough, North Leigh, Stonesfield and Tackley, and Woodstock and Bladon wards, strongly opposed being included in this constituency, noting that these wards are much closer to Witney, which they currently share a constituency with, than to Bicester. Despite this opposition, we only received one counter proposal which sought to address this issue, though this was highly disruptive to constituencies in the rest of the county. As well as the exclusion of communities to the north, the extension of our proposed Witney constituency to include areas to the south was opposed by respondents who felt that wards in the District of Vale of White Horse have few ties to Witney. This point was made particularly by residents of the Stanford ward, and we received a counter proposal which suggested that this ward be included in the Didcot and Wantage constituency, which otherwise attracted few representations.
1058. Our proposed Banbury constituency received a mixture of responses. As with the proposed Bicester constituency, there was opposition to including District of West Oxfordshire wards in this constituency; however, some respondents suggested that it was sensible to propose a constituency that included both Banbury and Chipping Norton. We received support for the proposed constituencies of Oxford East, and Oxford West and Abingdon, particularly our proposal to use the River Cherwell as a boundary between the two constituencies.

1059. The majority of representations received concerning the proposed Henley constituency focused on the name rather than the boundaries of this constituency. A number of representations suggested, given that Thame is now the largest popular centre in this constituency, that Henley and Thame would be a more appropriate name.

### **Revised proposals**

1060. In light of the representations received, our Assistant Commissioners recommended that we modify our initial proposals for Oxfordshire.

1061. Our Assistant Commissioners considered whether changes could be made to the proposed Witney constituency in order to reflect concerns raised. Though they accepted that the Eynsham and Cassington, Freeland and Hanborough, and North Leigh wards are more closely connected to Witney than to Bicester, they noted that including these wards in the Witney constituency would necessitate substantial changes to the scheme of constituencies in the rest of Oxfordshire. Considering the evidence received, our Assistant Commissioners felt that no alternative would result in a better overall pattern of constituencies, and they therefore recommended we retain the boundaries of our initially proposed Bicester constituency. However, they also recommended the alternative name Bicester and Woodstock, in order to reflect the District of West Oxfordshire component of this constituency.

1062. It was noted by our Assistant Commissioners that the Stanford ward could be included in the proposed Didcot and Wantage constituency without additional knock-on effects. Given the evidence we received on this point, they recommended that we make this change in our revised proposals.

1063. Given the broad support for our initial proposals for the Banbury, Henley, Oxford East, and Oxford West and Abingdon constituencies, our Assistant Commissioners recommended we retain these constituencies in the revised proposals. While they did see merit in the proposal of renaming the proposed Henley constituency as Henley and Thame, they did not feel that the evidence received was sufficiently compelling to recommend a name change at this stage.

1064. We agreed with all of the recommendations of the Assistant Commissioners. We therefore confirmed the initial proposals for the four constituencies listed above, and the proposed Bicester constituency with the new name Bicester and Woodstock. We also made changes to the boundaries of the proposed Witney, and Didcot and Wantage constituencies, with the inclusion of the Stanford ward in the Didcot and Wantage constituency.

### **Consultation on the revised proposals**

1065. We received a number of additional representations in opposition to including wards from the District of West Oxfordshire in the Banbury, and Bicester and Woodstock constituencies, although we received no new counter proposals which included more of these wards in the proposed Witney constituency. Some representations additionally opposed our proposed name for the proposed Bicester and Woodstock constituency, suggesting that, as Kidlington is larger than Woodstock, Bicester and Kidlington would be preferable.

1066. The inclusion of the Stanford ward in the proposed Didcot and Wantage constituency was well received by the small number of representations we received concerning this constituency. We received a counter proposal which suggested including the Sandford & the Wittenhams ward,

which we proposed in the Didcot and Wantage constituency, in the Oxford West and Abingdon constituency, and including the Holywell ward in the Oxford East constituency. This counter proposal did not receive any representations in support of it, and the general response to our proposed Oxford East, and Oxford West and Abingdon constituencies was again positive.

1067. In our revised proposals report, we requested additional feedback on the question of whether or not to revise the name of the proposed Henley constituency to Henley and Thame. We received a small number of representations on this matter, but those that we did receive were nearly unanimous in their support for the proposed name of Henley and Thame.

### **Final recommendations**

1068. Having considered the evidence, we are not recommending any changes to the boundaries of our revised proposals for Oxfordshire. Although we acknowledge the clear ties between Witney and the Eynsham and Cassington, Freeland and Hanborough, and North Leigh wards, we have not received any counter proposals which demonstrate how these wards could be included in the Witney constituency without considerable disruption to the rest of the county.

1069. Similarly, we are not persuaded of the need to revise the name of the proposed Bicester and Woodstock constituency. While we accept that Kidlington has a greater population than Woodstock, we feel that it is important to recognise that this constituency contains parts of the District of Cherwell and District of West Oxfordshire. We are satisfied that Woodstock is the most recognisable settlement in the West Oxfordshire component of this constituency, and have therefore retained the name of the Bicester and Woodstock constituency in our final recommendations.

1070. Having requested further submissions on the name of our proposed Henley constituency, we are persuaded that the name Henley and Thame would be more reflective of the balance of population in this constituency, and we have therefore adopted it as part of our final recommendations.

1071. Our final recommendations in Oxfordshire are therefore for constituencies of: Banbury; Bicester and Woodstock; Didcot and Wantage; Henley and Thame; Oxford East; Oxford West and Abingdon; and Witney. These constituencies are composed of the areas listed in Volume two and shown on the maps in Volume three of this report.





## South West

1072. The South West currently has 55 constituencies. Of these, 23 have electorates within the permitted electorate range. The electorates of seven constituencies currently fall below the permitted range, while the electorates of 25 constituencies are above. Our proposals increase the number of constituencies in the region by three, to 58.
1073. The South West comprises the ceremonial counties of: Avon (including Bath and North East Somerset, Bristol, North Somerset, and South Gloucestershire); Wiltshire (including Swindon); Cornwall (including the Isles of Scilly); Devon (including Plymouth and Torbay); Dorset (including Bournemouth, Christchurch, and Poole); Gloucestershire; and Somerset. The South West region is covered by a mix of district and county councils, and unitary authorities.
1074. We appointed two Assistant Commissioners for the South West – Anita Bickerdike and Vicky Smith – to assist us with the analysis of the representations received during the first two consultation periods. This included chairing public hearings, which were held in the region in order to hear oral evidence directly from the public. The dates and locations of these hearings were:
- Exeter: 21–22 March 2022
  - Gloucester: 24–25 March 2022
  - Bath: 28–29 March 2022
  - Dorchester: 31 March–1 April 2022.
1075. Following Ms Smith’s resignation, John Feavour QPM was appointed Assistant Commissioner for the region.

### Sub-division of the region

1076. In formulating our initial proposals, we noted that the electorate of the South West of 4,242,136 results in it being entitled to 58 constituencies, an increase of three. We then considered how this number of constituencies could be split across the region.
1077. Gloucestershire’s electorate of 483,442 results in a mathematical entitlement to 6.59 constituencies. This is too large for six whole constituencies, and too small for seven. It therefore needed to be paired in a sub-region with a neighbouring county or unitary authority. Wiltshire (including the Swindon unitary authority), has a combined electorate of 533,514, resulting in a mathematical entitlement to 7.27 constituencies. While it was possible to formulate a pattern of constituencies within Wiltshire, we considered that pairing the two counties allowed us to create a pattern of constituencies that better reflects the statutory factors across the sub-region as a whole. Having combined Gloucestershire and Wiltshire in one sub-region, we proposed the allocation of 14 constituencies, an increase of one constituency. We considered that the constituency crossing the county boundaries should not be between Gloucestershire and Swindon unitary authority: doing so would mean that the town of Swindon would be divided between three constituencies, covering three council areas (Swindon, Wiltshire, and a Gloucestershire local authority).

1078. The electorate of the unitary authorities that constitute the former county of Avon, at 854,331, results in a mathematical entitlement to 11.64 constituencies. While it was possible to allocate 12 constituencies to Avon, the average electorate in the county would be 71,194, only 1,470 electors within the permitted electorate range, meaning that we would have limited flexibility in formulating a pattern of constituencies. The electorate of Devon (including Plymouth and Torbay) at 919,454 results in a mathematical entitlement to 12.53 constituencies. It would therefore be difficult to allocate a whole number of constituencies to the county without significant disruption to local ties. We therefore proposed that the county be grouped with another county. Somerset has an electorate of 425,570, which results in a mathematical entitlement to 5.80 constituencies and, while it was possible to allocate a whole number of constituencies to both Devon and Somerset, we proposed that the two counties be grouped together. Given the limited flexibility in constructing constituencies within Avon, we proposed that it should form part of a sub-region with the other two counties, thereby creating a sub-region comprising Avon, Somerset and Devon. This results in a mathematical entitlement to 29.97 constituencies and an allocation of 30 constituencies to the sub-region, representing an increase of two from the current figure. We therefore proposed three constituencies that cross county boundaries in this sub-region. Two would cross the county boundary between Avon and Somerset and the other would cross the county boundary between Somerset and Devon.
1079. The unitary authorities in Dorset have a combined electorate of 587,471, resulting in a mathematical entitlement to 8.00 constituencies. We therefore considered Dorset as a sub-region in its own right and allocated eight whole constituencies, which is the same as the existing allocation.
1080. With an electorate of 438,354, Cornwall (including the Isles of Scilly) had a mathematical entitlement to 5.97 constituencies. We proposed to treat Cornwall as a sub-region in its own right and allocated to it six constituencies, which is unchanged from its existing number. Treating Cornwall as its own sub-region avoided the construction of a constituency that crossed the boundary between Cornwall and Devon, which was mathematically necessary in previous reviews.
1081. Counter proposals were received that suggested alternative sub-regions. A key feature of some of these counter proposals was to avoid crossing, where possible, existing county boundaries, or even the traditional 'shire' county boundaries that existed prior to the 1974 reorganisation of county boundaries:
- sub-regions of: Gloucestershire, South Gloucestershire and Bristol; Bath and North East Somerset, North Somerset, and Somerset; Wiltshire, Dorset, and Devon; and Cornwall
  - one representation for a region-wide counter proposal that was the same as we had proposed, but split the Bournemouth, Poole and Christchurch constituencies and involved six county boundary crossings
  - sub-regions of: Gloucestershire, Bristol and Somerset; Wiltshire; Dorset; Devon; and Cornwall
  - sub-regions of: historic Gloucestershire and Bristol; historic Somerset; Devon; Wiltshire; Dorset; and Cornwall. One counter proposal suggesting these alternative sub-regions added that the adoption of these sub-regions would require 'some compromises'.

1082. In formulating our revised proposals, we noted that these counter proposals for alternative sub-regions had some merit and aimed at minimising constituencies that crossed county boundaries. However, the sub-regions we had proposed were largely supported during the consultation on the initial proposals, particularly from those commenting on the whole region and from the four qualifying political parties. We concluded that in some cases the alternative sub-regions would result in more disruption to some existing constituencies and would not therefore better reflect the statutory factors in the region.

1083. In the response to our revised proposals, we did not receive any further evidence that would justify the use of alternative sub-regions to those we adopted in our revised proposals, and we were not persuaded that the alternative proposals had garnered greater support in the secondary consultation. Therefore, the sub-regions we propose as part of the final recommendations are:

- Gloucestershire and Wiltshire (including Swindon)
- Avon (Bath and North East Somerset; Bristol; North Somerset; and South Gloucestershire), Somerset and Devon (including Plymouth and Torbay)
- Dorset (including Bournemouth, Christchurch, and Poole)
- Cornwall (including Isles of Scilly).

## **Gloucestershire and Wiltshire**

### **Initial proposals**

1084. Of the 13 existing constituencies in the Gloucestershire and Wiltshire sub-region, five were within the permitted electorate range and the remaining eight were above the range. Furthermore, an increase in the total number of constituencies in the sub-region unavoidably results in significant change to many existing constituencies. We therefore proposed a cross-county boundary constituency that extended along most of the boundary between Gloucestershire and Wiltshire. This constituency comprised wards that were considered to be similarly rural in nature, from the existing The Cotswolds and North Wiltshire constituencies. Additionally, we proposed retaining the existing constituency of Forest of Dean, with minor modifications only to reflect changes to local government ward boundaries.

1085. The electorate of the existing constituency of Gloucester is too large to form a single constituency, and had to be modified in order to bring it within the permitted range. We examined the possibility of including three wards comprising the Quedgeley community in The Cotswolds constituency, but considered that including wards from the northern area of Gloucester in a Tewkesbury constituency would better reflect the statutory factors. The City of Gloucester ward of Longlevens is not included in the existing current Gloucester constituency; our initial proposals retained this ward in the Tewkesbury constituency, as well as the City of Gloucester wards of Elmbridge and Barnwood.

1086. The electorate of the existing Cheltenham constituency exceeded the permitted electorate range. The Borough of Cheltenham wards of Prestbury and Swindon Village are currently included in the existing Tewkesbury constituency, and we additionally included the Borough of Cheltenham ward

of Springbank in the Tewkesbury constituency, in order to bring the Cheltenham constituency within the permitted range.

1087. With an electorate of 83,818, the existing Tewkesbury constituency was above the permitted range. In formulating our proposals for Gloucester and Cheltenham, we had increased the electorate of the Tewkesbury constituency further. To bring it within the permitted range, we proposed the inclusion of seven District of Tewkesbury wards from the existing Tewkesbury constituency to the adjacent The Cotswolds constituency, including the Winchcombe and Isbourne wards, together with five wards that form the geographical area between our proposed Gloucester and Cheltenham constituencies.
1088. The electorate of the Stroud constituency, at 84,573, required modifications as it considerably exceeded the permitted range. We therefore proposed the inclusion of four Stroud district wards, namely Hardwicke, Painswick & Upton, Bisley, and Chalford, in our proposed The Cotswolds constituency. We also proposed the inclusion of the two Stroud district wards of Kingswood and Wotton-under-Edge in the Stroud constituency. Apart from the changes previously mentioned, we proposed significant changes to the boundaries of the existing The Cotswolds constituency with the inclusion of 20 wards from the existing The Cotswolds constituency, which included the town of Cirencester, as well as seven wards from the North Wiltshire constituency, which included the town of Malmesbury.
1089. One of our objectives was not to cross the boundary with the unitary authority of Swindon. Currently, the unitary authority of Swindon has two constituencies. However, the North Swindon constituency has an electorate of 82,561, while the South Swindon constituency's electorate of 72,994 falls within the permitted range. Changes to local government wards result in the Mannington and Western, and Covingham and Dorcan wards being split between the two existing constituencies. We therefore proposed the inclusion of the whole of the Mannington and Western, and Covingham and Dorcan wards in the South Swindon constituency, which would bring the North Swindon constituency within the permitted range. However, this resulted in the South Swindon constituency having too large an electorate and needing to be reduced. To address this, we included the Borough of Swindon wards of Wroughton and Wichelstowe, and Ridgeway in our proposed East Wiltshire constituency.
1090. Our proposed Chippenham constituency included the towns of Chippenham, Royal Wootton Bassett, and Calne. The ward of Bromham, Rowde & Roundway was also included. We proposed a Melksham and Devizes constituency encompassing the towns of Corsham, Melksham, Bradford-on-Avon, and Devizes and consequently renamed the existing Devizes constituency East Wiltshire. Apart from the inclusion of the two Swindon wards, we also included in East Wiltshire the wards that comprise the town of Amesbury, to avoid its division between constituencies.
1091. To increase the electorate of the Salisbury constituency, we included the whole of the Fovant & Chalke Valley ward and the Tisbury ward, which also allowed for the South West Wiltshire constituency to fall within the permitted range. We proposed that this constituency be renamed Trowbridge and Warminster.

### **Consultation on the initial proposals**

1092. There was support for our proposals in this sub-region, but considerable objection and a number of counter proposals were submitted.
1093. The initial proposals for the Forest of Dean, which had effectively remained the same as the existing constituency, did not elicit a large number of representations.
1094. Our proposals to include the Springbank ward in the Tewkesbury constituency were overwhelmingly opposed, with approximately 350 objections. Representations suggested the ward had no real connection to Tewkesbury and should remain in the Cheltenham constituency. Counter proposals suggested that the ward to be included in the Tewkesbury constituency (thereby not in the Cheltenham constituency) should be either Battledown, Pittville, or more particularly, St. Paul's. This latter ward is in the same county division as the Swindon Village ward, currently in the existing Tewkesbury constituency, and it was argued that St. Paul's should be included in the Tewkesbury constituency instead of Springbank. However, these suggestions came to the notice of many respondents who strongly opposed the exclusion of the St. Paul's ward from Cheltenham and claimed that the counter proposals with respect to the St. Paul's ward would see much of Cheltenham High Street excluded from the Cheltenham constituency.
1095. Our initial proposals for Gloucester attracted a great deal of opposition, with over 400 representations opposing the inclusion of either the Elmbridge or Barnwood wards in the Tewkesbury constituency. Furthermore, there were numerous representations calling for the Longlevens ward to be returned to the Gloucester constituency. Some suggested an alternative configuration that would place all three wards in question in the Gloucester constituency and include the three wards containing the community of Quedgeley in The Cotswolds constituency or Stroud.
1096. Concerns were raised that our proposals would result in an irregularly-shaped Tewkesbury constituency, with the town of Tewkesbury isolated in a relatively small area in the far north of the constituency. However, there was both opposition and support for the inclusion of the Winchcombe ward in The Cotswolds constituency. There were also calls for the entirety of the town of Churchdown to be included in The Cotswolds constituency: the initial proposals had divided the town into two separate constituencies with the Churchdown St. John's ward included in the Tewkesbury constituency, and the Churchdown Brookfield with Hucclecote ward included in The Cotswolds constituency.
1097. There was considerable opposition to our proposed Stroud constituency, with numerous representations received suggesting alternate wards that should be included. We received approximately 110 representations objecting to the inclusion of the Chalford ward in The Cotswolds constituency, with proposals for the ward, and Minchinhampton ward to be included in Stroud. The inclusion of the Hardwicke ward in The Cotswolds constituency was opposed, with it being suggested that the Nailsworth ward would be a better fit in The Cotswolds constituency and that Hardwicke's links with Stroud were stronger than those of Nailsworth. However, this position was opposed in many representations which suggested that Nailsworth should not be included in The Cotswolds, and that, of the two wards, Hardwicke's inclusion in The Cotswolds constituency was more appropriate. There was also opposition to the inclusion of the Bisley, and the Painswick & Upton wards in The Cotswolds, but support for the inclusion of the Wotton-under-Edge and Kingswood wards in the Stroud constituency.

1098. A significant number of representations were received in opposition to the proposed The Cotswolds constituency, but there was some support with the suggestions that it be renamed North Cotswolds. The Cirencester and North Wiltshire constituency was also opposed. The widely expressed sentiment was that the town of Cirencester, known as ‘the Capital of the Cotswolds’, could not be in a constituency with parts of Wiltshire. A counter proposal to include the Chedworth & Churn Valley ward in the same constituency as Cirencester was supported. A number of representations opposed the inclusion of Coln Valley ward, and in particular Northleach ward, in the cross-country constituency, which it was said looked towards the north Cotswolds. A number of representations suggested that the constituency would be more acceptable if the name were changed, with South Cotswolds being a popular and widely suggested option.
1099. The decision to treat Swindon as a separate entity and not to cross the county boundary between Gloucestershire and Wiltshire drew widespread support. Nevertheless, there were representations both supporting and opposing the initial proposals for the two Swindon constituencies, with objections raised about the inclusion of two Swindon borough wards in the East Wiltshire constituency.
1100. The local government ward boundary changes in Wiltshire had posed challenges in maintaining as best we could the existing pattern of constituencies, and our initial proposals in Wiltshire were almost universally opposed. Nevertheless, there was some positive feedback regarding the proposed Chippenham constituency, and some support for the Melksham and Devizes constituency. A counter proposal was received that made substantial changes to the Chippenham, Melksham, and Devizes constituencies, with the primary objective to include the town of Corsham in the same constituency as Chippenham. It proposed the inclusion of the Bromham, Rowde & Roundway ward in a Melksham and Devizes constituency alongside the Calne wards, Lyneham ward, and the three Royal Wootton Bassett wards. The reconfigured Chippenham constituency would comprise two Bradford-on-Avon wards, three Corsham wards, Box & Colerne, Hilperton, Holt, Melksham Without West and Rural, and the Winsley & Westwood wards. However, there was significant opposition to this counter proposal, with it being claimed that the links between Corsham and Chippenham were overemphasised, and that Calne had closer ties with Chippenham. There were also concerns about the counter proposed Melksham and Devizes constituency, running from Royal Wootton Bassett south to Devizes and beyond.
1101. The perceived separation of the rural wards surrounding Devizes from the town also elicited widespread opposition, particularly from the Urchfont & Bishops Canning, and The Lavingtons wards. Devizes was located at the eastern end of the newly formed Melksham and Devizes constituency, and many representations from the renamed East Wiltshire constituency appeared to believe it was their areas that had been moved between constituencies and not the town of Devizes. The inclusion of the town of Amesbury in the East Wiltshire constituency was opposed, with it being suggested that Amesbury identifies more closely with Salisbury than with the towns to the north of Salisbury Plain. There was a suggestion for the East Wiltshire constituency to be renamed Vale of Pewsey.
1102. From the proposed Trowbridge and Warminster constituency there were few representations, but there was some support. The main issue was the call for a return of the existing constituency name of South West Wiltshire constituency. Although both the Nadder Valley and Tisbury wards

attracted very little attention in the representations, among those that did mention the wards were proposals that they be included in the Salisbury constituency.

### Revised proposals

1103. Our Assistant Commissioners visited various areas in Cheltenham to investigate the conflicting evidence. From their observations they concluded that the St. Paul's ward was an essential component of the town centre and excluding it from the Cheltenham constituency would be disruptive, as would the exclusion of either the Pittville or Battledown wards. They considered that the Springbank ward's connections with the town centre were weaker than those of St. Paul's, Battledown, and Pittville. We agreed with them and did not revise our proposals for the Cheltenham constituency. Given the support for our initial proposals we did not revise the Forest of Dean constituency.
1104. We noted that it was not necessary to include a further two Gloucester wards in the Tewkesbury constituency. Our Assistant Commissioners noted that, as the Longlevens and Elmbridge wards lay adjacent to each other, and Longlevens is already part of the Tewkesbury constituency, these two wards should remain included in the Tewkesbury constituency, and that the Barnwood ward would now remain in the Gloucester constituency. The Assistant Commissioners also considered the counter proposals suggesting the exclusion of the three southern wards of Gloucester comprising the town of Quedgeley. They visited the areas and considered that, while the counter proposals had some merit, they were not persuaded that it should be part of The Cotswolds constituency rather than Gloucester, despite its relatively newer and self-contained nature. We agreed.
1105. Our Assistant Commissioners considered that the re-inclusion of the Isbourne and Winchcombe wards in the Tewkesbury constituency again was appropriate, and that this would also allow for the inclusion of the two wards encompassing the town of Churchdown within the same constituency.
1106. With regard to the Stroud constituency, and following the site visit to the area by our Assistant Commissioners, we agreed with their recommendations and proposed a revised configuration for the Stroud constituency. We included the Chalford ward in the constituency, but not the Minchinhampton ward, which we considered was somewhat separated from Chalford and was not currently included in the existing Stroud constituency, nor the Bisley ward. Our Assistant Commissioners considered the evidence for the retention of the Nailsworth ward in the Stroud constituency to be stronger than that of the Hardwicke ward. We agreed and proposed that Hardwicke would continue to be included in The Cotswolds constituency, with the adjacent Painswick & Upton ward. Additionally, although we proposed that the Wotton-under-Edge ward continue to be included in the Stroud constituency, we included the Kingswood ward in the cross-county constituency between Gloucester and Wiltshire to accommodate the changes made. Both are District of Stroud wards but currently part of The Cotswolds constituency. Despite our thorough consideration of all the wards, we acknowledged that there is no perfect solution that would satisfy all residents of the District of Stroud.
1107. We revised our initial proposals to include the Northleach and Coln Valley wards in The Cotswolds constituency rather than Cirencester and North Wiltshire. Although we acknowledged the historical connections between the Chedworth & Churn Valley ward and the town of Cirencester, including it in the cross-county boundary constituency would result in an abnormal shape



for The Cotswolds, with a narrow strip of land linking its two parts, and that its non-inclusion would result in a Cotswolds constituency with an electorate below the permitted range. We also renamed The Cotswolds, and Cirencester and North Wiltshire constituencies as the North Cotswolds and South Cotswolds, respectively.

1108. Following the Assistant Commissioners' site visits to the area and their recommendations, we made some significant revisions to our proposed constituencies in Swindon and Wiltshire. We aimed at producing a set of constituencies that sought to reflect the community identity evidence received. However, our Assistant Commissioners identified that no counter proposal received fully achieved this, so they investigated alternative configurations. They proposed a revised Chippenham constituency, which would include Royal Wootton Bassett, Calne, and Corsham within the same constituency as Chippenham. They considered this would address many concerns raised in the representations and partially satisfy the conflicting counter proposals received. Although they recognised the clear distinction between the urban area of Devizes and the rural wards of Urchfont & Bishops Canning, and The Lavingtons, we acknowledged the large number of representations that suggested that these wards looked to Devizes. Amending the Chippenham constituency, as suggested above, allowed for both wards to be included in the Melksham and Devizes constituency, and the Bromham, Rowde & Roundway ward could also be included without the need for a split. The Assistant Commissioners also proposed including the Calne South ward in the Melksham and Devizes constituency. We agreed with the recommendations of the Assistant Commissioners and considered the configuration of constituencies they had formulated better reflected the community identity evidence received.
1109. Including the Urchfont & Bishops Cannings, and The Lavingtons wards in the Melksham and Devizes constituency meant we had to find an alternative ward to include in the East Wiltshire constituency to bring it within the permitted range. Given that the electorates of all the constituencies in the county were so close to the minimum permitted, accomplishing this was a difficult task. However, we proposed the inclusion of the Till Valley ward in the East Wiltshire constituency from the Salisbury constituency. Our revised proposal maintained the town of Amesbury in the East Wiltshire constituency, despite the concerns in various representations. To accommodate these further changes, the Nadder Valley and Tisbury wards were included in the Salisbury constituency, as suggested in some of the representations, and to bring the Trowbridge and Warminster constituency – which we proposed revert to its existing name of South West Wiltshire – within the permitted electorate range, we included the Hilperton ward in this constituency, which, it could be argued, is a part of Trowbridge.
1110. Following the site visit by our Assistant Commissioners to Swindon and their recommendations, we proposed that there be no revisions to the Swindon North constituency, for which we received relatively few representations. However, we had received a number of representations regarding the Swindon South constituency with support for the inclusion of each of the three wards of Wroughton and Wichelstowe, Chiseldon and Lawn, and Ridgeway in the constituency, instead of in East Wiltshire. However, due to the size of the ward electorates, and in order to allow for the other changes we were proposing, this was not possible. The Assistant Commissioners had considered that, while the Wroughton and Wichelstowe, and Ridgeway wards were mostly rural in nature and should be included in the East Wiltshire constituency, the Chiseldon and Lawn ward, while also having a rural extent, had a significant urban element in the north of the ward that was in close proximity to the Lawn and Badbury areas and Swindon Old Town. They therefore

recommended that the ward be split, with three urban polling districts (CLA, CLC, and CLD) lying to the north of the M4 motorway included in Swindon South, while the rural polling district of CLB would be included with the other two Swindon wards in the East Wiltshire constituency. We agreed with their recommendations and considered that the split of the Chiseldon and Lawn ward allowed for greater benefits for the pattern of constituencies across the sub-region.

### **Consultation on the revised proposals**

1111. Although we received some support for not including the St. Paul's ward in the Tewksbury constituency instead of the Springbank ward, there was still some opposition, albeit much less, to the continued inclusion of Springbank in the Tewkesbury constituency. A small number of representations continued to suggest that Battledown ward should be excluded instead of Springbank, as an affluent area with a lower population density may be a better fit for Tewkesbury than Springbank. Elsewhere, we received support for the re-inclusion of the Barnwood ward in the Gloucester constituency in our revised proposals. However, there was still opposition to the exclusion of the Elmbridge and Longlevens wards from the Gloucester constituency.
1112. A limited number of representations were received regarding the Forest of Dean constituency, with some suggesting name changes of Forest of Dean and North Gloucestershire, or West Gloucestershire, and regarding the Tewkesbury constituency, which, it was suggested, be renamed North Gloucestershire. Only two representations were received in relation to the re-inclusion of the Isbourne and Winchcombe wards in the Tewkesbury constituency.
1113. We received some support for the Stroud and North Cotswolds constituencies, as well as for the inclusion of the Nailsworth, Chalford, and Wotton-under-Edge wards in the revised Stroud constituency. However, a number of representations continued to suggest that the wards of Hardwicke, Minchinhampton, Bisley, and Painswick & Upton, which are currently part of North Cotswolds, should be included in the Stroud constituency instead. Unfortunately, it is not possible to include all District of Stroud wards within the Stroud constituency. One counter proposal suggested that the Severn ward should be included in the North Cotswolds constituency instead of the Stroud constituency. There was little feedback regarding the reuniting of the two Churchdown wards in the North Cotswolds constituency.
1114. Objections were received regarding the South Cotswolds constituency. It was suggested by respondents that the Kingswood ward is closely linked with Wotton-under-Edge and should also be included in the Stroud constituency, as we had done in our initial proposals. A representation that included the Kingswood ward in the Stroud constituency affected three constituencies.
1115. The revised proposals for the Chippenham, and Melksham and Devizes constituencies garnered little support. Most representations were in favour of keeping Chippenham as it is and there was significant opposition, with a large number of representations opposed, in particular, to the inclusion of the Box & Colerne ward in the Melksham and Devizes constituency. The majority of these respondents proposed that the ward be included in the South Cotswolds or Chippenham constituencies instead. A number of representations opposed the inclusion of the Calne South ward in the Melksham and Devizes constituency and drew attention to the fact that its inclusion in the constituency would separate the ward from the rest of Calne. We had included this ward in the Melksham and Devizes constituency as this enabled the configuration of constituencies that we had proposed in Wiltshire. A counter proposal suggested that the Calne Rural ward be split and partly included in Melksham and Devizes, while the Kington ward should be included

in Chippenham. There were also calls to reverse the name of the Melksham and Devizes constituency. Although both towns are similar in size population-wise, Melksham remains marginally the larger of the two.

1116. While there was some minor support for including the Hilperton ward in South West Wiltshire, there was a slightly greater opposition, and little mention of the constituency name reverting back to the existing constituency name. There was some opposition to the inclusion of the Nadder Valley and Tisbury wards in the Salisbury constituency, but this was overshadowed by the opposition to the inclusion of the Till Valley ward in the East Wiltshire constituency. Some representations suggested that all the areas of the Wylve Valley, including Nadder Valley and Till Valley, should be in the same constituency. A further counter proposal was received suggesting that Nadder Valley could be retained in the South West Wiltshire constituency, while the Urchfont & Bishops Canning ward could be split between the constituencies of Melksham and Devizes, and East Wiltshire. At the initial proposals, almost all the representations from this ward supported its inclusion in the same constituency as Devizes, and, although few representations mentioned the ward in this consultation, those that did were mostly in support. Another counter proposal stated that the Chiseldon and Lawn ward be wholly located in Swindon South, with either Urchfont & Bishops Canning being split between the constituencies of Melksham and Devizes, and East Wiltshire, or the Wylve Valley ward being split between the constituencies of South West Wiltshire and East Wiltshire.

1117. Few representations were received with regard to Swindon North. Some support was received for the inclusion of the northern part of the split Chiseldon and Lawn ward in Swindon South. Proposals to split the Wroughton and Wichelstowe ward received some support. Several representations considered that none of the three southern Swindon wards – Wroughton and Wichelstowe, Chiseldon and Lawn, and Ridgeway – should be included in the East Wiltshire constituency. While this approach may not be feasible, any further changes to the proposed boundaries would have significant consequences across Wiltshire.

### **Final recommendations**

1118. We considered that no significant new evidence had been received with respect to the proposed Swindon North and Swindon South constituencies that would not have significant knock-on effects and we propose no further changes to these two constituencies.

1119. We considered also that no significant or new evidence had been received with respect to the Forest of Dean, Tewkesbury, Cheltenham, or Gloucester constituencies that would lead us to consider altering the configuration or names of these constituencies. We note the support for the inclusion of the Chalford and Wotton-under-Edge wards in Stroud and acknowledge the issues concerning the Stroud constituency and the desire from residents of each of the wards in the District of Stroud to be included in the Stroud constituency. However, this is not possible and we propose no further changes to this or the North Cotswolds constituency.

1120. We note the concerns about the inclusion of the Kingswood ward in the South Cotswolds constituency but, although not ideal, we note that the ward is not currently included in the existing Stroud constituency.

1121. We note and, to a degree, share the concerns about the inclusion of the Box & Colerne ward in the Melksham and Devizes constituency, but have not identified an alternative configuration that

does not have a significant impact on the other constituencies in Wiltshire. The same applies to the inclusion of the Calne South ward within the Melksham and Devizes constituency. The constituencies in Wiltshire have very low electorates – often barely above the permitted minimum – and any change of just a single ward would result in knock-on effects on other constituencies.

1122. We noted the concerns about the inclusion of the Nadder Valley ward in the Salisbury constituency, but the electorate of the Salisbury constituency is already only 70,242 and could not accommodate the loss of a ward and remain within the permitted range.
1123. With regard to the proposed inclusion of the Till Valley ward in the East Wiltshire constituency in our revised proposals, whereas we had included the ward in the Salisbury constituency (where it is currently located) in the initial proposals, we noted the significant degree of opposition, and decided that a site visit should be undertaken to see if any alternatives could be adopted. We had noted that it would be possible, numerically, to exchange the Till Valley between constituencies with the Winterslow & Upper Bourne Valley ward from Salisbury.
1124. It was observed that the villages of the Winterslow & Upper Bourne Valley, and Old Sarum & Lower Bourne Valley wards were linked along the A338 into Salisbury. It was also observed that, although areas of the Till Valley in the south of the ward closest to Salisbury no doubt looked to the city, further into the ward was open countryside, in contrast to what had been observed in the other two wards under consideration. Also, the A36 was a much more significant road than the A338, and provided very good transport links to the north, and east and west along the A303. The A360 was considered to be a more minor road with no discernible communities along it until Salisbury itself.
1125. From the observations we considered that, despite some links to Salisbury in the south, Till Valley is a large rural ward and the links to Salisbury are not as evident as those of the Winterslow & Upper Bourne Valley, and Old Sarum & Lower Bourne Valley wards. Although not an ideal solution, we considered that the inclusion of the Till Valley ward in the East Wiltshire constituency rather than in Salisbury was more appropriate than the inclusion of the Winterslow & Upper Bourne Valley ward in East Wiltshire.
1126. Our final recommendations for Gloucestershire and Wiltshire are therefore for constituencies of: Cheltenham; Chippenham; East Wiltshire; Forest of Dean; Gloucester; Melksham and Devizes; North Cotswolds; Salisbury; South Cotswolds; South West Wiltshire; Stroud; Swindon North; Swindon South; and Tewkesbury. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## **Avon, Somerset and Devon**

### **Initial proposals**

1127. Our proposed sub-region of Avon, Somerset and Devon has a combined mathematical entitlement to 29.97 constituencies, resulting in an allocation of 30 constituencies to the sub-region – an increase of two from the current arrangement. In our initial proposals, we suggested that five constituencies should cross county or unitary authority boundaries within the sub-region. Specifically, two constituencies would cross the boundary between Somerset and unitary authorities within the former Avon county area, two would cross the boundary between

two unitary authorities within the former Avon county area, and one would cross the county boundary between Somerset and Devon.

1128. Two of the four existing constituencies in Bristol exceed the permitted electorate range, notably Bristol West, which has an electorate of almost 100,000. We therefore allocated an additional, fifth, constituency to Bristol, which would have to cross local authority boundaries. While extending an existing Bristol constituency northwards into South Gloucestershire was considered to be too disruptive, we proposed a new Bristol North East constituency that extended eastwards into South Gloucestershire. This proposed constituency would encompass the City of Bristol wards of Frome Vale, Eastville, and Hillfields from the existing Bristol East constituency, as well as the ward of Lockleaze from the existing Bristol North West constituency. Additionally, it would include the four South Gloucestershire wards of New Cheltenham, Kingswood, Woodstock, and Staple Hill & Mangotsfield and, we considered, would reflect community ties.
1129. We included the Bishopston & Ashley Down ward in our proposed Bristol North West constituency, which was otherwise unchanged apart from the transfer of the Lockleaze ward to the Bristol North East constituency and renamed the existing Bristol West constituency as Bristol Central. As described above, we significantly modified the existing Kingswood constituency by transferring three wards to our proposed Bristol North East constituency, along with the entire Staple Hill & Mangotsfield ward. We included 11 Bath and North East Somerset wards from the current North East Somerset constituency with the four existing Kingswood constituency wards of Hanham, Longwell Green, Bitton & Oldland Common, and Parkwall & Warmley to create a new Keynsham and North East Somerset constituency.
1130. Modest changes were made to the existing Thornbury and Yate, and Filton and Bradley Stoke constituencies in the South Gloucestershire unitary authority. These included realignment with new ward boundaries, as well as the inclusion of the Pilning & Severn Beach ward in Thornbury and Yate, and the Emersons Green ward in Filton and Bradley Stoke from the existing Kingswood constituency.
1131. The low electorate of the existing Bath constituency was addressed by the inclusion of the wards of Bathavon North and Newbridge. We proposed to reduce the electorate of the existing North Somerset constituency by including the Yatton ward in our proposed Wells and Mendip Hills constituency. We also reduced the electorate of the Weston-super-Mare constituency by including the three North Somerset wards of Blagdon & Churchill, Banwell & Winscombe, and Congresbury & Puxton in our proposed Wells and Mendip Hills constituency.
1132. Due to large constituency electorates, major configuration changes in Somerset were unavoidable. As previously mentioned, we proposed a new Wells and Mendip Hills constituency. In addition to the wards mentioned above, we included within it the East Polden and West Polden wards from the Bridgwater and West Somerset constituency, but not the Ashwick, Chilcompton and Stratton ward. We proposed a new Frome constituency which would cross the county boundary constituency between Avon and Somerset and would consist of six Bath and North East Somerset wards, including Midsomer Norton, and 13 wards from the existing Frome and Somerton constituency. The South Somerset district ward of Bruton would also be included, as well as the Ashwick, Chilcompton and Stratton ward from the existing Wells constituency. We proposed a Glastonbury and Somerton constituency, which would consist of 15 wards from the existing Frome and Somerton constituency, including the town of Somerton, and seven

wards from the existing Wells constituency, including Glastonbury and Street. Additionally, we included the Hamdon, and The Pennards and Ditchheat wards in the Glastonbury and Somerton constituency.

1133. We proposed minor changes to the Yeovil constituency in order to realign its boundaries with the new local government ward boundaries. Our proposals maintain the entirety of the town of Yeovil within the constituency. We addressed the large electorate of the Bridgwater and West Somerset constituency by proposing a Bridgwater constituency that included 13 wards from the existing constituency and four wards from the existing Wells constituency. We proposed a Tiverton and Minehead constituency, crossing county boundaries, with wards from the Mid Devon, and Somerset West and Taunton local authorities, which included the remaining wards from the Bridgwater and West Somerset constituency, eight wards from Tiverton and Honiton and three from the Taunton Deane constituency, and the whole of the divided South Quantock, and Wiveliscombe & District wards. We proposed the reconfigured Taunton Deane constituency be renamed Taunton, since Taunton Deane district no longer exists. The changes proposed to the existing Tiverton and Honiton constituency led us to propose a Honiton constituency that included four wards from the existing East Devon constituency that also included the towns of Ottery St. Mary and Sidmouth.
1134. The electorate of the existing Exeter constituency was above the permitted range. We therefore proposed the inclusion of three wards that had been divided by changes to local government ward boundaries in our proposed Exmouth constituency, namely, Priory, St. Loyes, and Topsham.
1135. The existing North Devon constituency was unchanged from the existing constituency in our initial proposals, and only minor adjustments were proposed to the existing Newton Abbot, Torbay, and Central Devon constituencies to realign their boundaries with new local government ward boundaries. Our proposed Central Devon constituency would still contain wards from four local authorities. We proposed minor changes to the existing Totnes constituency by the inclusion of the Charterlands ward from the South West Devon constituency. The Torridge and West Devon, and South West Devon constituencies were largely unchanged in our proposals, apart from the inclusion of the Buckland Monachorum and Burrator wards from the existing Torridge and West Devon to our proposed South West Devon constituency. Our proposed Torridge and West Devon constituency would continue to encompass the whole of the District of Torridge, along with nine District of West Devon wards, and was renamed Torridge and Tavistock.
1136. The electorate of the existing Plymouth Moor View constituency was below the permitted range, while that of the Plymouth, Sutton and Devonport constituency was above. Exchanging two wards would bring both within the permitted range, but would include rural areas in the same constituency as the historic port. To maintain community ties, we proposed the division of the Peverell ward along the Outland Road, resulting in the three polling districts of KA, KB and KC being included in the Plymouth Sutton and Devonport constituency, and the KC and KD polling districts in the Plymouth Moor View constituency.

### **Consultation on the initial proposals**

1137. Our proposals for the Bristol constituencies were generally well supported, and there was a consensus that the Bristol constituencies should not expand northwards into Filton and Bradley Stoke, but eastwards into the existing constituency of Kingswood. However, there was some

limited opposition to the inclusion of parts of Knowle from the existing Bristol South constituency to our proposed Bristol East constituency with it being claimed this would divide communities.

1138. There was some opposition to the relatively modest changes in South Gloucestershire, particularly from those who supported the counter proposals that suggested a reconfiguration of the South Gloucestershire constituencies into a broadly east/west arrangement: South Gloucestershire West would succeed Filton and Bradley Stoke and include the wards of Severn Vale and Thornbury from the existing Thornbury and Yate constituency, the entire Winterbourne ward, and the Pilning & Severn Beach ward. The South Gloucestershire East constituency would comprise six wards from the existing Thornbury and Yate constituency, along with the entire Boyd Valley, Frenchay & Downend, and Emersons Green wards.
1139. A significant number of representations objecting to the proposed Keynsham and North East Somerset constituency were received. Most objected to the transfer of the Bathavon South ward and the town of Midsomer Norton to our proposed Frome constituency, the fact that the existing Kingswood constituency would no longer exist in its current form, and for the lack of commonality between areas north and south of the river Avon. The name of the constituency was also criticised for being misleading, as Keynsham was already part of North East Somerset. However, we also received support for our proposed Frome constituency, as well as for our proposed Bath constituency.
1140. Our proposed Weston-super-Mare constituency elicited relatively few representations. The configuration of the North Somerset constituency itself was not particularly contentious, but a significant level of opposition was received regarding our proposed Wells and Mendip Hills constituency. Some came from the Congresbury & Puxton ward, but most commented on the inclusion from North Somerset of the Yatton ward, lying adjacent to the Bristol Channel, with it being claimed that the constituency made no sense. However, support was received from others for our proposed Wells and Mendip Hills constituency. Under our initial proposals the town of Somerton was included in the newly configured Glastonbury and Somerton constituency. There was some limited objection, but also support for the proposed constituency. A counter proposal suggested that The Pennards and Ditchat ward should be included in Frome rather than Glastonbury and Somerton and exchanged with the Bruton ward.
1141. Although there was general support for the proposed Bridgwater constituency, some concerns were raised regarding the inclusion of the Hinkley Point nuclear power station development in our proposed Tiverton and Minehead constituency, rather than in Bridgwater. Opposition to our proposed Yeovil constituency was limited, although it was proposed that the Northstone, Ivelchester & St. Michael's ward, which is currently split between existing constituencies, should be split, with the area in the south that is currently part of the Yeovil constituency remaining in Yeovil.
1142. The proposed Tiverton and Minehead cross-county boundary constituency was supported, with some representations saying that the proposed constituency was geographically cohesive, but this was outweighed by significant opposition to the inclusion of parts of two different counties in the same constituency. The proposed Taunton constituency was much opposed, with it being claimed that the Norton Fitzwarren & Staplegrove ward was an integral part of the town of Taunton, with much compelling evidence presented. A number of representations suggested that the ward could be exchanged between constituencies, with the Upper Culm

ward instead being included in Tiverton and Minehead. This would also restore the link between the ward with the Lower Culm ward, which was already included in the proposed Tiverton and Minehead constituency.

1143. The initial proposals for the Honiton constituency were largely supported and the inclusion of the town of Sidmouth in the constituency was welcomed. However, some representations claimed that the inclusion of Ottery St. Mary in this constituency would separate it from the West Hill & Aylesbeare ward, with which there were strong links and which we had included in our proposed Exmouth constituency. There were also a number of representations proposing to rename the constituency Honiton and Sidmouth.
1144. The proposals for the Exeter and Exmouth constituencies garnered a huge number of representations, with near unanimous opposition. More than 500 written representations and petitions containing 1,853 names were received. The primary point of objection was the inclusion of the Priory ward in the Exmouth constituency. Numerous representations were made, detailing the ward's historic links to the centre of Exeter with much detailed and compelling evidence. Many suggested that the Pinhoe ward, rather than Priory, should be included in the Exmouth constituency.
1145. With regard to the Central Devon constituency, although the existing constituency had been unchanged in our initial proposals, apart from realignments due to local government boundary changes, there were proposals for the Exe Valley ward to be included in the Exmouth constituency, thereby eliminating its status as an orphan ward in Central Devon. It was also suggested that the Newton Poppleford & Harpford ward, given its close proximity to Sidmouth, should be included in the Honiton constituency. This change would allow for the inclusion of the Exe Valley ward in the Exmouth constituency, thereby eliminating the orphan ward in Central Devon, and reducing the number of local authorities contained within the constituency from four to three.
1146. In our initial proposals, there were no changes to the existing Newton Abbot, and Torbay constituencies, apart from minor alterations to realign constituency boundaries with changes to local government ward boundaries. Our proposals for these constituencies were not contentious, although there were suggestions for the Newton Abbot constituency to be renamed Teignbridge, which had been a former name of the constituency.
1147. Despite the relatively minor changes proposed to the existing Totnes constituency, there was still some opposition. This largely came from residents in the Brixham area, who believed that they should be included in the Torbay constituency. However, due to the electorate of the Torbay constituency, this was not possible. Additionally, there were over 200 representations and a petition in support of renaming the Totnes constituency as South Devon.
1148. Few representations were received with regard to the North Devon constituency, which was unchanged in our initial proposals. The existing Torridge and West Devon, and South West Devon constituencies were largely unchanged in our initial proposals, but the inclusion of the Buckland Monachorum and Burrator wards in South West Devon was objected to in a number of representations. It was claimed that the wards' ties are with the town of Tavistock in our proposed Torridge and Tavistock constituency, and that the proposals would divide Dartmoor National Park across constituencies. However, there was also support for the proposed constituencies.



1149. In Plymouth, a significant number of representations were received which fell roughly equally between support for and opposition to our initial proposals. However, we received counter proposals that suggested a three-way split of Plymouth with Plymouth East, Plymouth North and Ivybridge, and Plymouth West constituencies. Our Assistant Commissioners were not persuaded by these, but considered that the proposals to split either the Peverell or Devonport wards had merit, but were also contentious. This was an area in which the Assistant Commissioners considered that a site visit might be required to observe both the proposed splits, and their implications 'on the ground' before making any revised recommendations.

### **Revised proposals**

1150. In view of the degree of support for our proposed constituencies in Bristol, we considered that no further modifications were necessary for the constituencies of Bristol Central, Bristol East, Bristol North East, Bristol North West, and Bristol South. In South Gloucestershire, we noted the support for our initial proposals and opposition to the counter proposal for the two constituencies. We were not persuaded that the counter proposal, which suggested a significant reconfiguration of the constituencies which had been only modestly altered in our initial proposals, was a suitable alternative. We therefore proposed no amendments to the constituencies of Filton and Bradley Stoke, and Thornbury and Yate, apart from an alteration to the designation of Filton and Bradley Stoke to a borough constituency in view of its high electorate density.

1151. Our Assistant Commissioners noted both the support for, and opposition to, our proposed Keynsham and North East Somerset constituency and they acknowledged that our proposed name was not an accurate description of the constituency. Therefore, we recommended the name North East Somerset and Hanham, which was suggested at the public hearing held in Bath, as a more appropriate name. No other changes to the constituency were proposed. The electorate of the Bath constituency was such that it was not possible to also include the Bathavon South ward, as suggested in a number of representations. We therefore proposed no changes to the Bath constituency. We noted both the support and opposition (largely with regard to the Bathavon South ward) to our proposed Frome constituency, and the alternative names that had been suggested. One representation claimed that our proposals were much more coherent than the existing Somerton and Frome constituency. We were not persuaded to make any further changes to the constituency,

1152. Relatively few representations were received with regard to the proposed Weston-super-Mare constituency. There was a greater degree of opposition to the proposed North Somerset constituency, but much of this was in opposition to the composition of the surrounding constituencies that had an impact on North Somerset, particularly the inclusion of the Yatton and Kenn areas (Yatton ward) in our proposed Wells and Mendip Hills constituency that crossed the boundary between North Somerset unitary authority and Somerset. However, we also received some support and we agreed with our Assistant Commissioners that neither constituency should be modified, as to do so would have knock-on effects elsewhere.

1153. There was some limited objection to the proposed Glastonbury and Somerton constituency, but we had also received some support for our initial proposals. On balance our Assistant Commissioners were not minded to modify our initial proposals. We agreed with them.

1154. The proposed Bridgwater constituency was largely supported. Our Assistant Commissioners considered the issue of the Hinkley Point nuclear power station development, but noted that

no-one had made a clear counter proposal that retained the power station in the Bridgwater constituency without causing disruption elsewhere. We were not persuaded that the name of the Bridgwater constituency should be changed to Bridgwater Bay, Bridgwater and Burnham, or anything similar and therefore proposed no further changes to the Bridgwater constituency.

1155. Opposition to our initial proposals for the Yeovil constituency was limited. Our Assistant Commissioners considered that the suggestion that the southern part of the newly enlarged ward of Northstone, Ivelchester & St. Michael's should be split, with the villages south of the A303 being retained within the Yeovil constituency, was not feasible. The electorate of our proposed Glastonbury and Somerton constituency was just within the permitted range and could only tolerate the loss of 266 electors without further consequences affecting other proposed constituencies. We noted that there were 1,434 electors in the polling district that covers the village of Ilchester alone. The Assistant Commissioners were not persuaded of the merits of the proposed split ward and, in acknowledging the general level of support for the constituencies in this area, they proposed no change to the Yeovil constituency as initially proposed. We agreed with them and proposed no changes to our initially proposed Yeovil constituency.
1156. The Assistant Commissioners noted the considerable opposition to the proposed cross-county boundary constituency of Tiverton and Minehead, with a number of representations claiming that we had disregarded community ties and the boundaries of the historic counties of Somerset and Devon. However, there was also support, and some claimed that the new constituency was cohesive. Much of the opposition concerned the inclusion of the Norton Fitzwarren & Staplegrove ward in this constituency rather than in the Taunton constituency: Detailed evidence was provided of the strong links of Norton Fitzwarren & Staplegrove ward with Taunton. We and our Assistant Commissioners found this evidence to be persuasive. A compensatory alteration to allow for the ward's inclusion would, however, be necessary. As proposed in a number of representations, we therefore amended our initial proposals to include the Norton Fitzwarren & Staplegrove ward in the Taunton constituency, and the Upper Culm ward in the Tiverton and Minehead constituency, thereby uniting the ward with the Lower Culm ward. However, we were not persuaded to include Wellington in the name of the Taunton constituency, as had been suggested.
1157. We agreed with those who proposed that the Honiton constituency be renamed Honiton and Sidmouth, to reflect the inclusion of this sizeable town within the constituency. We also considered the evidence to include both the West Hill & Aylesbeare, and Newton Poppleford & Harpford wards in the Honiton constituency to be persuasive, although we considered suggestions to also include the Budleigh & Rayleigh ward were not feasible given the other changes that were being proposed. We also noted that these changes would allow for the Exe Valley ward to be included in the Exmouth constituency, leading to benefits for the Central Devon constituency that have been highlighted elsewhere in this report. We therefore proposed a reconfigured and renamed Honiton and Sidmouth constituency, and the changes to the Central Devon constituency, as part of our revised proposals.
1158. We noted the strength of opposition to our proposals for the Exeter and Exmouth constituencies, and in particular, the compelling evidence regarding the Priory ward. We therefore proposed that the Priory ward would remain in the Exeter constituency, in exchange for the Pinhoe ward, which would be included in the renamed Exeter East and Exmouth constituency.

1159. We considered the rationale for the Totnes constituency to be renamed South Devon to be persuasive and also noted the considerable support for this change. We accordingly revised our initial proposals to change the name of the constituency to South Devon. We acknowledged the frustrations of those living in the Brixham area at not being included in the Torbay constituency. However, the electorate of Torbay is such that this is not possible. We noted the support for the Newton Abbot constituency, but were not persuaded that a change of name was required here. We therefore proposed no change to the Torbay and Newton Abbot constituencies, as initially proposed.
1160. We did not consider the opposition, or the evidence received with regard to the South West Devon, and Torrington and Tavistock constituencies to be sufficiently persuasive as to warrant any alterations to these constituencies.
1161. In view of the contentious nature of our proposed Plymouth constituencies and the lack of consensus on which ward should be split, a site visit to the area was undertaken. We considered that the counter proposal to split the Devonport ward would divide the Devonport Docks effectively across the middle, excluding the administrative buildings and Headquarters of HM Naval Base Devonport from the maritime-focused Plymouth Sutton and Devonport constituency. We also struggled to see how, despite the counter claims, the long-standing and historical reference to Devonport could continue to be appropriate for just one of the constituency names if the counter proposal were to be adopted. We considered that the splitting of the Peverell ward broadly along the A386 Outland Road, while not perfect, provided for a better pattern of constituencies. We therefore proposed no amendments to the Plymouth Moor View, and Plymouth Sutton and Devonport constituencies, as initially proposed.

### **Consultation on the revised proposals**

1162. Few representations were received with regard to the Bristol constituencies, with the only notable opposition, albeit minor, continuing to be some opposition to the inclusion of parts of Knowle from the existing Bristol South constituency to the proposed Bristol East constituency and the perceived division of the community between constituencies.
1163. Of the representations received regarding the Thornbury and Yate constituency, the majority supported our proposed constituency. Few representations were received with regard to Filton and Bradley Stoke. Most of these were in objection to the inclusion of the Emersons Green ward from the former Kingswood constituency or contained general comments about the perceived northward expansion of Bristol.
1164. The Bath constituency garnered widespread support, with very few representations received. However, among these, some continued to suggest the inclusion of the Midford, Monkton Combe, Southstoke and Wellow, and Claverton parishes (Bathavon South ward) in the Bath constituency.
1165. Relatively few further representations commenting on the configuration of the proposed North East Somerset and Hanham constituency were received, and no alternative proposals with persuasive justification were received. There remained some disappointment about the proposed name, with suggestions that the largest town, Keynsham, should be incorporated into the name, citing Hanham as a small suburb

1166. Very few representations were received with regard to the Weston-super-Mare constituency and no significant new evidence provided. The opposition to the North Somerset, and Wells and Mendip Hills constituencies was still significant, with approximately 70 representations across both constituencies, and continued to largely concern (as in the responses to the initial proposals) the inclusion of the Yatton ward in the Wells and Mendip Hill constituency. Aside from this issue, there was limited opposition to the revised proposals concerning other areas of the constituency. Some alternative names were proposed for the Wells and Mendip Hills constituency, including Mid Somerset, Wells and The Western Mendips, and simply Wells.
1167. Few representations were received regarding the Glastonbury and Somerton, and Yeovil constituencies, and no significant new evidence was presented. We received a mixture of support and opposition to our proposed Frome constituency. The issues raised in these representations were similar to those in the initial proposals and many concerned the name of the constituency, with a variety of names suggested that included Frome and Radstock, Midsomer Norton and Frome, or East Somerset and Frome. Some representations, as in the initial proposals, suggested that the Bruton ward should be included in our proposed Glastonbury and Somerton constituency. It was argued that the inclusion of the Bruton ward in the Frome constituency split the community of Bruton between constituencies. It was stated that there were strong links between the ward and the village of Pitcombe, which is located in the Tower ward, and Castle Cary, which is located in the Cary ward, both of which are included in our proposed Glastonbury and Somerton constituency. One representation, in common with a counter proposal submitted during the consultation on the initial proposals, proposed an exchange of the Bruton, and The Pennards and Ditchat wards between the two constituencies. The point was made that the inclusion of the Bruton ward in the Glastonbury and Somerton constituency resulted in it being an orphan ward, and that an exchange of these two wards between constituencies would rectify this, thereby reducing the number of local authorities in Glastonbury and Somerton from three to two.
1168. There remained some surprise that the Hinkley Point nuclear power station was not included in the Bridgwater constituency, but no concrete counter proposal was suggested. Our proposed Tiverton and Minehead constituency continued to attract some opposition, but these were now fewer in number. Whilst there was strong support for the inclusion of the Norton Fitzwarren & Staplegrove ward in the Taunton constituency, we also received a number of representations that proposed the constituency be renamed Taunton and Wellington in order to reflect the different communities included in the constituency.
1169. With regard to the North Devon, Newton Abbot, Torbay, and South Devon constituencies, there were a limited number of representations, mostly suggesting name changes, which, apart from continued suggestions for Newton Abbot to be renamed Teignbridge, were not supported in other representations. However, objections persisted about including wards containing Brixham within the proposed South Devon constituency, as the town was claimed to be an integral part of the English Riviera and separating it from Torbay would be a 'disservice' to the whole area.
1170. Unlike the initial proposals, there were relatively few representations with regard to the proposed Exeter, and Exeter East and Exmouth constituencies, although there was some limited opposition to the exclusion from Exeter of the Pinhoe ward. However, a significant number of representations requested that the Exeter East and Exmouth constituency be renamed Exmouth and East Exeter, or Exmouth and Exeter East, to reflect that the population of Exmouth surpasses the combined population of the three Exeter wards. One suggestion was to name it Exmouth and the Clysts,

while another representation suggested that Exeter should be renamed Exeter West. Very few representations were received regarding the inclusion of the Exe Valley ward in the revised Exeter East and Exmouth constituency.

1171. A small number of representations continued to be received regarding the Torridge and Tavistock, and South West Devon constituencies. There was generally some support for both constituencies, but we continued to receive representations opposing the inclusion of Buckland Monachorum and Burrator wards in South West Devon, rather than in Torridge and Tavistock. It continued to be claimed that the Dartmoor National Park would be divided between two constituencies in our proposals, although this is already the case with the existing constituency pattern.
1172. In Plymouth, we received few representations, with the majority of these opposing our revised proposals; however, no significant new evidence was received.

### **Final recommendations**

1173. We noted that there continued to be calls for the inclusion of the Midford, Monkton Combe, Southstoke and Wellow, and Claverton parishes (Bathavon South ward) in the Bath constituency. This would entail significant changes to the Bath and surrounding constituencies, and we do not consider that there has been a clear or compelling rationale provided for how Bath would benefit from such an inclusion.
1174. Having considered all the evidence received, we do not consider there is sufficient support or persuasive evidence for us to recommend any changes to the boundaries of our revised proposals for this sub-region, apart from in two areas. We reconsidered the representations regarding the Bruton ward and counter proposals that had suggested that the ward could be transferred from the Frome constituency to Glastonbury and Somerton, with The Pennards and Ditchheat ward going from that constituency to Frome. We noted that this would remove the anomaly of an orphan ward in Glastonbury and Somerton, reduce the number of local authorities from three to two, and would recognise the links of the ward with the communities of Pitcombe and Castle Cary. In considering the evidence again, we concluded that this proposal did have merit and we therefore propose to revise further our proposals here and recommend that the Bruton ward be included in the Glastonbury and Somerset constituency, and that The Pennards and Ditchheat ward be included in the Frome constituency, as part of our final recommendations.
1175. We noted that a number of alternative names had been suggested for a number of constituencies. Most of these did not garner any particular support, although we considered that there was some degree of support for the Frome constituency to be renamed to include some reference to East Somerset. We were persuaded that such a name change would better describe the constituency and we therefore recommend that the Frome constituency be renamed Frome and East Somerset.
1176. There was a considerable degree of support for calls to include the town of Wellington in our proposed Taunton constituency. We noted that the town does have a significant population, we considered the evidence, and concluded that the proposal had merit. We therefore recommend that the Taunton constituency be renamed Taunton and Wellington. Similarly, we noted that there is significant support for changing the name of the Exeter East and Exmouth constituency to Exmouth and Exeter East. We noted that the population of Exmouth surpasses the combined population of the three Exeter wards. We therefore revise our proposals and change the name of the constituency to Exmouth and Exeter East. We acknowledge the logic of renaming Exeter as

Exeter West, but the constituency, apart from minor readjustments, is otherwise unchanged from the existing constituency and we saw no support for this proposal.

1177. We have again considered the evidence received in relation to our proposed constituencies in Avon, Somerset and Devon. We recognised that we had received some opposition to our revised proposals and therefore investigated the alternatives. However, having considered the evidence received, we consider our revised proposals for the remaining constituencies in this sub-region continued to provide the best balance between the statutory factors.

1178. Our final recommendations for Avon, Somerset and Devon are therefore for constituencies of: Bath; Bridgwater; Bristol Central; Bristol East; Bristol North East; Bristol North West; Bristol South; Central Devon; Exeter; Exmouth and Exeter East; Filton and Bradley Stoke; Frome and East Somerset; Glastonbury and Somerton; Honiton and Sidmouth; Newton Abbot; North Devon; North East Somerset and Hanham; North Somerset; Plymouth Moor View; Plymouth Sutton and Devonport; South Devon; South West Devon; Taunton and Wellington; Thornbury and Yate; Tiverton and Minehead; Torbay; Torridge and Tavistock; Wells and Mendip Hills; Weston-super-Mare; and Yeovil. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## **Dorset**

1179. We considered Dorset as a sub-region on its own with an allocation of eight constituencies (the same as the existing number). In parts of the county we proposed only minor changes to the configuration of the existing constituencies.

### **Initial proposals**

1180. The sub-region encompasses the two unitary authorities of Dorset, and Bournemouth, Christchurch and Poole (BCP). Of the eight existing constituencies, six are within the permitted electorate range, while the existing Mid Dorset and North Poole constituency has an electorate below the range, and the West Dorset constituency has an electorate above. All eight constituencies could remain entirely situated within the ceremonial county of Dorset without any need to cross county boundaries.

1181. In formulating our initial proposals, we recognised that the Bournemouth East, Bournemouth West, Poole, and Christchurch constituencies currently have electorates within the permitted range. However, due to changes in local government ward boundaries, retaining these constituencies in their existing form would result in the splitting of several wards between constituencies. To avoid this, we realigned the constituency boundaries to reflect the new local government ward boundaries. This was the only change we proposed for these constituencies.

1182. The new West Purbeck ward in the Mid Dorset and Poole North constituency had been extended to the coast, resulting in the bisecting of the existing South Dorset constituency. We proposed the inclusion of the whole of West Purbeck ward in the South Dorset constituency. Furthermore, we proposed extending the Mid Dorset and Poole North constituency northwards to encompass the Stour & Allen Vale ward, which was previously in the North Dorset constituency. We also proposed the inclusion of the whole of the Chalk Valleys, and Puddletown & Lower Winterborne wards in the North Dorset constituency.

1183. To reduce the high electorate of the West Dorset constituency, we proposed a configuration that would not allow for the inclusion of both the Winterborne & Broadmayne, and Chickerell wards in the West Dorset constituency. Instead, we recommended transferring the Chickerell ward from the existing West Dorset constituency for the Upwey & Broadwey ward from the existing South Dorset constituency.

### **Consultation on the initial proposals**

1184. In response to the consultation on our initial proposals, the four Bournemouth, Christchurch and Poole unitary authority constituencies garnered a considerable amount of support, given that they remain unchanged except for the necessary realignment with new ward boundaries. However, some respondents expressed their objection to East Dorset wards being included in the Christchurch constituency, while others objected to the renaming of the Mid Dorset and North Poole constituency to Mid Dorset and Poole North, claiming this was unnecessary and that the name should remain unchanged.

1185. The inclusion of Chickerell ward in the South Dorset constituency, and Upwey & Broadwey ward in the West Dorset constituency, in particular, was very unpopular. Many representations argued that this configuration disrupted the area's historic and local ties, and that the exclusion of Upwey & Broadwey from South Dorset and the inclusion of Chickerell did not take into account the geography and history of the area or the wishes of the people concerned. It was also suggested that Chickerell was a better fit in the West Dorset constituency and that its residents consider that they are not part of Weymouth and wish to be identified as a town in their own right, whereas Upwey & Broadwey had always been considered to be a part of Weymouth. Many representations therefore proposed for the Upwey & Broadwey ward to remain in the same constituency as Weymouth, since the ward followed the traditional main route to Weymouth town centre and was surrounded on three sides by other wards of Weymouth.

1186. Our initial proposals led to over 250 objections concerning the Chalk Valleys ward. Residents in the Cerne Abbas and Piddle Valley areas were strongly opposed to their inclusion in the North Dorset constituency, as they felt their ties were with Dorchester and the West Dorset constituency. Many of these respondents considered that North Dorset and places such as Verwood, which were included in the North Dorset constituency, were far away and had little in common with their area.

1187. We received representations from individuals offering an alternative configuration, as well as other counter proposals. It was generally accepted that there was no whole ward solution to resolve the issue, and that splitting wards between constituencies was the only way to properly address the constraints faced in the Dorset sub-region. It was claimed that local ties could be broken in many areas if we did not consider whether the circumstances in South Dorset, North Dorset, and West Dorset were exceptional enough to warrant constituencies that split wards. A counter proposal suggested the splitting of two wards: West Purbeck and Chalk Valleys. It was contended that a West Purbeck ward split would allow us to construct a Dorset sub-region with a similar pattern to existing constituencies, while also allowing the Upwey & Broadwey Ward to be included in the South Dorset constituency; the counter proposal suggested that four polling districts of the West Purbeck ward be included in the proposed North Dorset constituency, with the remainder of the ward included in our proposed South Dorset constituency. It was also proposed that a split in the Chalk Valleys ward would permit the Cerne Abbas and Piddle Valley areas to be included in West

Dorset, the same constituency as the significant market town of Dorchester, with which the local residents claimed affinity.

### **Revised proposals**

1188. After carefully reviewing the initial proposals and the evidence received, including the option of ward splits, our Assistant Commissioners made a site visit to the area to observe for themselves the wards in question and the community ties that have been suggested exist.
1189. They concluded that none of the evidence provided during the consultation provided a compelling reason to alter the composition of any of the Dorset constituencies as proposed in our initial proposals, or in particular, to split any wards. They noted the support for our proposed constituencies in the Bournemouth, Christchurch and Poole unitary authority and considered that, although there was a significant degree of opposition to our proposals in the south and west of the county, particularly from the Chalk Valleys and Upwey & Boadwey wards, we had proposed a cohesive set of constituencies without the need to divide wards. They also noted the support for our proposals from the qualifying political parties. We agreed, and made no further changes. However, we did consider that those who suggested it was unnecessary to change the original name of the proposed Mid Devon and Poole North constituency were correct, and we revised our initial proposals to change the name of the constituency back to its existing name of Mid Dorset and North Poole.

### **Consultation on the revised proposals**

1190. We received only a few representations for the two Bournemouth constituencies and Poole; there was support for our revised proposals, and unanimous support for our decision to amend our initial proposals and retain the original name of the Mid Dorset and North Poole constituency. However, we did receive a number of representations, which, while not suggesting a change to the configuration of the Christchurch constituency, called for it to be renamed Christchurch and East Dorset
1191. We received no support for a previous proposal that sought to divide Dorset into two sub-regions. However, a number of representations were received from the West Purbeck ward – particularly from the Bere Regis, Bloxworth and surrounding areas – that the ward should be split, with the areas in the north-west of the ward being retained within the Mid Dorset and North Poole constituency.
1192. We again received significant opposition to the inclusion of the Chalk Valleys ward in the North Dorset constituency. Additionally, there was some additional opposition to the inclusion of the Chickerell ward in the South Dorset constituency, and there continued to be a significant number of representations still opposing the inclusion of the Upwey & Broadwey ward in the West Dorset constituency.

### **Final recommendations**

1193. We have considered the evidence received and propose no changes to the boundaries or names of the proposed two Bournemouth constituencies, or the Christchurch and Poole constituencies.



1194. After thorough consideration of all the relevant factors and careful examination of the affected areas, we considered that it would be prudent to undertake a further site visit to the North, West and South Dorset constituencies.
1195. During the site visit to the Bere Regis and Bloxworth areas it was considered that these areas did indeed look eastwards towards the existing Mid Dorset and North Poole constituency as suggested in the representations, and that the main lines of communication were east/west across this part of the ward.
1196. Having visited the Weymouth area, we considered that including Chickerell in a constituency with Weymouth was appropriate. We observed that, along the Chickerell Road from Weymouth, the Charlestown area is at the eastern edge of the ward and was considered to be clearly an urban extension of Weymouth. We considered that the Chickerell Downs did not appear to be a dividing feature between Charlestown and Chickerell itself and, from the observations, and despite some of the claims in the representations, we considered Chickerell to also be suburban in nature and as much a part of the greater Weymouth area as was the Upwey & Broadwey ward. We therefore recommend no further amendments to our revised proposals with regard to the inclusion of the Chickerell ward with Weymouth in the South Dorset constituency
1197. We also observed the ties of the Upwey & Broadwey ward. We noted that the community of Broadwey is in the south of the Upwey & Broadwey ward and was suburban in nature, and certainly part of Weymouth. Upwey, in the north of the ward, had a more village-like feel about it, but still looked to Weymouth as the boundary with the rural Winterborne & Broadmayne ward to the north was clear. We also considered the large body of evidence that the communities of the ward overwhelmingly see themselves as part of Weymouth in the representations.
1198. We visited the Chalk Valleys ward and observed it to be a very rural ward with scattered villages, lying some distance from the town of Dorchester (with the Charminster St. Mary's ward lying between the ward and the town of Dorchester). We again considered the large body of evidence that was submitted, and have no doubt that residents of this area of Chalk Valleys ward would look towards Dorchester for shopping and services, as it is the nearest big town, but our observations did not lead us to conclude that, despite the local opposition to our proposals, there were sufficient grounds to warrant a splitting of the ward.
1199. However, we considered that our revised proposals did divide communities in the Weymouth area, and in particular, the inclusion of the Upwey & Broadwey ward in the West Dorset constituency, and we were also mindful of the representations received during the consultations – and in particular, the consultation on our revised proposals – from residents in the north of the West Purbeck ward, from the Bere Regis and Bloxworth areas. We investigated a number of configurations using whole wards in an attempt to find a solution that would resolve these issues, but considered these would be disruptive to the existing pattern of constituencies or would break community ties in the Dorchester area.
1200. We therefore considered that splitting a ward between constituencies could be justified. Having considered the evidence and visited the areas, we concluded that splitting the West Purbeck ward in the north of the ward – between the South Dorset, and Mid Dorset and North Poole constituencies – would better fit the statutory criteria in the Bere Regis and Bloxworth areas, which would be included within the constituency in which they were currently located: Mid Dorset

and North Poole. Furthermore, such a split would also allow for a better fit of the statutory criteria in the Weymouth area with the inclusion of the Upwey & Broadway ward in the South Dorset constituency; the ward is currently located in the existing South Dorset constituency. We therefore recommend that the WPU2 and WPU3 polling districts of the West Purbeck ward – which contain the Bere Regis, Bloxworth and surrounding areas – be included in the Mid Dorset and North Poole constituency. Such a split would closely follow the existing constituency boundary in this area.

1201. We also recommend that the Upwey & Broadway ward be included in the South Dorset constituency, as has been suggested in the majority of the representations that have been received, and which the splitting of the West Purbeck ward would now allow.

1202. We again considered whether it was necessary to split the Chalk Valleys ward, as had also been suggested by respondents. However, under the modified pattern of constituencies outlined above, we identified that it would be possible to include the whole of the Chalk Valleys ward in the West Dorset constituency. We considered that including the whole ward would better reflect the existing constituency and community identity as stated in the evidence we received. We considered whether this would detrimentally impact the shape of the North Dorset constituency but noted that, to some extent, this was determined by the shape of the Puddletown & Lower Winterborne ward. Finally, we considered whether to divide the Puddletown & Lower Winterborne ward between constituencies but considered this would provide no wider benefits across the region. Therefore, as part of our final recommendations, we propose that the Chalk Valleys ward be included in the West Dorset constituency.

1203. Our final recommendations for Dorset are therefore for constituencies of: Bournemouth East; Bournemouth West; Christchurch; Mid Dorset and North Poole; North Dorset; Poole; South Dorset; and West Dorset. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## **Cornwall**

### **Initial proposals**

1204. Cornwall and the Isles of Scilly has a combined electorate of 438,354, resulting in a mathematical entitlement to 5.97 constituencies. We did not consider that Cornwall needed to be paired with Devon and recommended that it be treated as its own sub-region and allocated six constituencies, the same as at present. Four existing constituencies have electorates that are within the permitted range. The two existing constituencies of St Austell and Newquay, and Truro and Falmouth have electorates above the permitted range. We therefore proposed relatively minor changes to the existing constituencies in the county. The existing North Cornwall constituency was wholly unchanged in our proposals, and the three existing constituencies of South East Cornwall, St Austell and Newquay, and St Ives were changed only to realign them with new local government ward boundaries. Under these proposals, the whole of the Roche & Bugle ward was included in South East Cornwall, and the Isles of Scilly would remain in the St Ives constituency.

1205. We proposed the inclusion of the whole of the Perranporth ward, and the Threemilestone & Chacewater ward in our Camborne and Redruth constituency, and included within the Truro and Falmouth constituency the Constantine, Mabe & Mawnan ward, and the whole of the Falmouth Trescobeas & Budock ward from the Camborne and Redruth constituency. In addition to the

inclusion of the whole wards mentioned previously in our proposed Camborne and Redruth constituency, we further proposed the inclusion of the whole of the wards of Lanner, Stithians & Gwennap, and St Agnes, which are currently divided between existing constituencies following local ward boundary changes.

### **Consultation on the initial proposals**

1206. We received several counter proposals, offering alternative configurations to constituencies in the county. Our initial proposals included the whole of the Roche & Bugle ward in the South East Cornwall constituency, but many argued that doing so would divide the historic China Clay area between constituencies. Instead, it was suggested it be included with other China Clay wards in the St Austell and Newquay constituency. Two counter proposals suggested the Fowey, Tywardreath & Par ward should be included in the South East Cornwall constituency to accommodate the Roche & Bugle ward's inclusion in the St Austell and Newquay constituency.
1207. We also received significant opposition to the inclusion of the Threemilestone & Chacewater ward in the Camborne and Redruth constituency. It was suggested that the ward should remain in the Truro and Falmouth constituency and respondents suggested that Threemilestone is a satellite village of Truro, with many local businesses considering themselves part of the greater Truro trading area. We again received differing counter proposals to resolve the inclusion of the Threemilestone & Chacewater ward in the Truro constituency.
1208. While the initial proposals for the rest of the constituencies in the Cornwall sub-region were mostly uncontentious, there was some opposition to the proposed Camborne and Redruth, and St Ives constituencies. Some argued that the town of Hayle should be included in St Ives, and the St Ives constituency should reference the Lizard Peninsula in its name.

### **Revised proposals**

1209. It had been suggested that, in order to accommodate the Roche & Bugle ward in St Austell and Newquay, the Fowey, Tywardreath & Par ward should be included in the South East Cornwall constituency. However, our Assistant Commissioners were not persuaded of this and considered that there was a strong association between this ward and the neighbouring St Blazey ward, both of which are included in the existing St Austell and Newquay constituency, as well as there being significantly weaker links to South East Cornwall, including a lack of a river crossing from this ward across the Fowey estuary. We agreed with their assessment and therefore did not accept these counter proposals, and proposed that the South East Cornwall constituency be unchanged from the existing constituency configuration. However, we did accept the evidence that the China Clay area should be wholly contained within one constituency and included the Roche & Bugle ward in the St Austell and Newquay constituency, which we considered was best accommodated by including the St Columb Major, St Mawgan & St Wenn ward in the North Cornwall constituency.
1210. We accepted the evidence and the recommendations of our Assistant Commissioners that the Threemilestone & Chacewater ward be included in the Truro and Falmouth constituency, with the Constantine, Mabe & Mawnan ward being included in the Camborne and Redruth constituency. In this configuration the two wards are exchanged, with both wards being included in their existing constituencies. We accepted that the Constantine, Mabe & Mawnan ward most likely looked towards the town of Falmouth, but noted that the ward was currently in the existing Camborne

and Redruth constituency, and that there were distinct benefits of retaining the Threemilestone & Chacewater ward in Truro and Falmouth.

1211. We did not consider that any further change to the Camborne and Redruth constituency, or to St Ives was necessary.

### **Consultation on the revised proposals**

1212. Although the revised proposals received overall support, some minor objections were raised regarding the inclusion of the St Columb Major, St Mawgan & St Wenn ward in North Cornwall as a compensation for the inclusion of Roche & Bugle in St Austell and Newquay. One representation repeated the suggestion that this ward should instead be included in St Austell and Newquay, with the Fowey, Tywardreath & Par ward being included in South East Cornwall. Another representation opposed the inclusion of the Constantine, Mabe & Mawnan ward in Camborne and Redruth, arguing that it should be included in Truro and Falmouth, which was the compensatory change made to return the Threemilestone & Chacewater ward to Truro and Falmouth.

1213. A few representations continued to oppose the inclusion of the town of Hayle in Camborne and Redruth (although the town is in the existing Camborne and Redruth constituency), suggesting that it should be included in St Ives instead. Several representations proposed alternative names for the St Ives constituency, such as: Penzance and Helston; West Cornwall and St Ives; West Penwith, Lizard and Scilly; or West Cornwall, St Ives and The Isles of Scilly. We also received some support for our pattern of constituencies, albeit with suggestions that we should further revise the boundaries to reflect new local government wards, which had been made by Order during the course of the 2023 Boundary Review.

### **Final recommendations**

1214. We did not consider that there was sufficient support for any of the suggested name changes. We also considered that the proposal to split wards to reflect the new local government wards that were made by Order during the course of the 2023 Boundary Review was not justified. We generally only consider such matters if there are broader benefits to be gained from splitting a ward. We do not consider that splitting of wards in this instance is necessary. Having considered the evidence received, we consider that our revised proposals for the Cornwall sub-region provide the best balance between the statutory factors.

1215. Our final recommendations for Cornwall are therefore for constituencies of: Camborne and Redruth; North Cornwall; South East Cornwall; St Austell and Newquay; St Ives; and Truro and Falmouth. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.



## West Midlands

1216. The West Midlands region currently has 59 constituencies. Of these constituencies, 26 have electorates within the permitted range. The electorates of 25 constituencies currently fall below the permitted range, while the electorates of eight constituencies are above. Our proposals reduce the number of constituencies in the region by two, to 57.
1217. The West Midlands region comprises the ceremonial counties of: Herefordshire; Shropshire; Staffordshire; Warwickshire; West Midlands; and Worcestershire; it is covered by a mix of district and county councils, and unitary authorities.
1218. We appointed two Assistant Commissioners for the West Midlands – Sir David Natzler KCB and Ruth Bagley OBE – to assist us with the analysis of the representations received during the first two consultation periods. This included chairing public hearings, which were held in the region in order to hear oral evidence directly from the public. The dates and locations of these hearings were:
- Birmingham: 28 February–1 March 2022
  - Stafford: 3–4 March 2022
  - Worcester: 7–8 March 2022.

### Sub-division of the region

1219. In formulating our initial proposals, we noted that the electorate of the West Midlands of 4,169,012 results in it being entitled to 57 constituencies, a decrease of two. We then considered how this number of constituencies could be split across the region.
1220. We noted that Herefordshire's electorate of 142,019 results in a mathematical entitlement to 1.94 constituencies and therefore considered Herefordshire as a sub-region in its own right, allocated two whole constituencies (the same as the existing allocation). The combined electorate of Shropshire (including Telford and Wrekin) is 376,136, resulting in a mathematical entitlement to 5.12 constituencies, so we considered Shropshire as a sub-region in its own right, allocated five whole constituencies (the same as the existing allocation). The electorate of Worcestershire is 447,152, providing it with a mathematical entitlement to 6.09 constituencies, so we also considered Worcestershire as a sub-region, allocated six constituencies (the same as the existing allocation). We also considered Warwickshire as a sub-region: its electorate of 432,462 results in a mathematical entitlement to 5.89 constituencies, so we allocated it six whole constituencies (no change from the existing allocation).
1221. Due to the size of the electorate in the West Midlands combined authority, it is beneficial to further divide it by local authority where possible. The City of Coventry (electorate 217,818) and the City of Birmingham (electorate 729,944) could be allocated three and ten whole constituencies respectively, but the Borough of Solihull (electorate 162,614) is too large for two whole constituencies, and far too small for three. It is therefore necessary to pair Solihull with either Birmingham or Coventry. We considered that pairing Birmingham with Solihull minimises disruption to existing constituencies, and better reflects local ties, resulting in a Birmingham and

Solihull sub-region allocated 12 whole constituencies (no change from the current allocation of constituencies across Birmingham and Solihull).

1222. The remaining authorities in the West Midlands combined authority are the metropolitan boroughs of Sandwell, Dudley, Wolverhampton, and Walsall, hereafter referred to as the Black Country. With a collective electorate of 827,975, the Black Country has a mathematical entitlement to 11.28, allowing 11 whole constituencies to be allocated. Similarly, Staffordshire (including Stoke-on-Trent) has a combined electorate of 832,892, giving a mathematical entitlement to 11.35 constituencies, also allowing 11 whole constituencies to be allocated. As allocating 11 to both would result in a total of 56 constituencies being allocated to the entire West Midlands region, one fewer than the 57 constituencies which it has been allocated, we considered it necessary to combine Staffordshire and the Black Country into one sub-region, to which we allocated 23 whole constituencies (a reduction of two from the existing allocation). This ensures that the total allocation for the West Midlands region is 57 constituencies.

1223. The use of the sub-regions outlined above was largely supported during the consultation on the initial proposals, including by those commenting on the pattern across the region. We did, however, receive in consultation some alternative proposed sub-regions, including particularly:

- treating Birmingham as stand-alone, pairing Solihull with Warwickshire instead; and
- treating Staffordshire as stand-alone, combining the Black Country with Birmingham.

1224. In formulating our revised proposals, we considered that no persuasive evidence had been received to propose any alternative sub-regions. In the first counter proposal above, we considered there was insufficient justification to disturb broadly well-received constituencies in Birmingham and Warwickshire, while in the second counter proposal above, we recognised the benefits that would arise to Staffordshire, but felt they would be outweighed by the degree of disruption this would require across the Black Country and Birmingham.

1225. In response to our revised proposals, we received one counter proposal to add Shropshire to the Staffordshire and Black Country sub-region, entailing a constituency that would combine the Shifnal and Albrighton wards of Shropshire with Staffordshire wards across to Great Wyrley. We do not consider that this counter proposal provided persuasive evidence that the perceived benefits would outweigh the disruption to otherwise well-supported Shropshire constituencies and the creation of an additional constituency that would cross a county boundary. Therefore, our final recommendations of sub-regions are:

- Birmingham and Solihull
- Coventry
- Herefordshire
- Shropshire (including Telford and Wrekin)
- Staffordshire (including Stoke-on-Trent) and the Black Country
- Warwickshire
- Worcestershire.

## **Birmingham and Solihull**

### **Initial proposals**

1226. Of the 12 existing constituencies in this sub-region, five were within the permitted electorate range, five below (all in Birmingham), and both constituencies in the Borough of Solihull were above. Under our initial proposals, no constituencies were proposed as completely unchanged from the existing boundaries, though in the case of Sutton Coldfield there was only a very minor change proposed, to reflect a change of local government ward boundary that affected no actual electors. We could not avoid more significant changes elsewhere, due to the changes to the local government ward boundaries that have taken place across Birmingham, and both Solihull constituencies being above the permitted range.
1227. Although Birmingham Perry Barr was within the permitted electorate range, neighbouring Birmingham Erdington was well below, particularly when realigning the Perry Barr constituency boundary with the new boundary of its component Kingstanding ward. We therefore proposed adding the Aston and Lozells wards to Erdington to bring both constituencies within the permitted range. We proposed that, having lost electors in the north and west, Birmingham Ladywood should include the wards of Alum Rock and Balsall Heath West. Birmingham Edgbaston was proposed to be changed essentially only to realign with new ward boundaries, though this did include taking in the whole of the North Edgbaston ward.
1228. Significant realignment to changed ward boundaries in the west of Birmingham Yardley was balanced by transferring Garretts Green ward to Birmingham Hodge Hill. North East Birmingham, we also felt, was the best place for the necessary crossing of the local authority boundary with Solihull, in order to reduce the number of electors in the two purely Solihull constituencies: we therefore included the Solihull wards of Castle Bromwich and Smith's Wood in the proposed Birmingham Hodge Hill constituency. Having lost its two northernmost wards, Meriden constituency was then proposed to include the wards of Elmdon and Silhill to leave both Meriden and Solihull constituencies within the permitted electorate range.
1229. In order to avoid significant disruption across the existing Birmingham constituencies of Northfield, Selly Oak, and Hall Green, we felt there was sufficient widely spread benefit to justify splitting the Weoley & Selly Oak ward between Birmingham Selly Oak and Birmingham Northfield constituencies, and splitting the Brandwood & King's Heath ward between Birmingham Selly Oak and Birmingham Hall Green constituencies.

### **Consultation on the initial proposals**

1230. In response to the consultation on our initial proposals, we received general support for our proposed Meriden and Solihull constituencies, though there was some concern at the inclusion of urban Solihull wards in the largely rural Meriden constituency: counter proposals were made to split wards to achieve constituency boundaries closer to the existing, and a change of name for both was suggested. We received a large number of responses opposing the inclusion of the two Solihull wards in Birmingham Hodge Hill constituency, asserting a lack of local ties with Birmingham.
1231. The proposed constituencies of Selly Oak, Edgbaston, and Northfield were all largely supported, and those of Ladywood, Yardley, and Hall Green received few responses at all, though we



received a counter proposal that would impact all those constituencies except Yardley. In respect of the proposed Birmingham Erdington and Birmingham Perry Barr, we received significant opposition grounded in the local ties connecting the Oscott and Kingstanding wards with the area of Erdington. We received support for maintaining the distinct boundaries of Sutton Coldfield, but a request to include 'Royal' in the constituency name, so as to match the town.

### **Revised proposals**

1232. Our Assistant Commissioners considered the request to add 'Royal' to the constituency name of Sutton Coldfield, but felt that the existing name was in line with our naming policy, particularly as there had effectively been no change to the constituency boundaries. They also noted that the Order for the local government wards does not include the prefix. They considered the counter proposal covering the proposed constituencies of Ladywood, Hall Green, Selly Oak, Edgbaston, and Northfield, and recognised the benefit of avoiding any split wards, but did not endorse this alternative, as it would disrupt significantly a number of proposed constituencies that had been positively welcomed. They did not consider that any other counter proposals for these five constituencies or Yardley made a sufficiently persuasive case to amend the proposals.

1233. The Assistant Commissioners felt that the evidence of local ties between Oscott and Kingstanding wards and the Erdington area was strong, and, having visited the area, felt internal connections to the south were better in the east of the existing Erdington constituency than in the west (though poor generally). They therefore recommended to us that the Oscott and Kingstanding wards be transferred to the Erdington constituency, and the Aston and Lozells wards be included in the Perry Barr constituency, along with three polling districts of the Stockland Green ward.

1234. In respect of the Hodge Hill constituency, the Assistant Commissioners noted the strength of feeling in the two Solihull council wards that there were poor ties with the Birmingham wards of the proposed constituency, but they felt that no detailed or viable alternative had been identified that would not be more widely disruptive to surrounding areas. Similarly, they considered the alternatives put forward to split wards in Solihull to achieve boundaries for Solihull and Meriden constituencies that would be closer to existing, but did not feel that the case to do so was sufficiently strong. They also felt that the existing names for these constituencies complied with our naming policy, and the boundary changes were not significant enough to support the name changes requested.

1235. We agreed with all the recommendations of our Assistant Commissioners in this sub-region and therefore revised our proposals only in respect of amended boundaries between the proposed Birmingham Erdington and Perry Barr constituencies.

### **Consultation on the revised proposals**

1236. In response to the consultation on our revised proposals, we received broad support for almost all the proposed constituencies.

1237. We received further responses opposing the inclusion of Solihull council wards in the proposed Birmingham Hodge Hill constituency. We also received requests to at least recognise these Solihull wards in the constituency name, as well as further requests to amend the names of the proposed Solihull and Meriden constituencies, to reflect the division of Solihull town centre between the two.

1238. We received a large number of responses opposing the newly proposed split of the Stockland Green ward between Birmingham Erdington and Perry Barr, evidencing strong ties between the Slade Road area and central Erdington, which would be broken by our revised proposals. This opposition proposed an alternative that would retain all of Stockland Green ward in Erdington constituency and instead split the Oscott ward, to retain four polling districts of that ward in the Birmingham Perry Barr constituency.

1239. There were very few responses in respect of all the remaining seven proposed constituencies in the sub-region, which were generally accepted or actively supported. Specific alternatives that we were asked to consider were: two alternative configurations of wards between the proposed Birmingham Selly Oak and Hall Green constituencies; and a renaming of the Birmingham Hall Green constituency to reflect the large Moseley community.

### **Final recommendations**

1240. In light of the general support for our revised proposals for the following constituencies, we make them our final recommendations: Birmingham Edgbaston; Birmingham Ladywood; Birmingham Northfield; Birmingham Yardley; and Sutton Coldfield.

1241. We considered the alternative configurations of wards put forward during revised proposals consultation for the Birmingham Selly Oak and Hall Green constituencies. The first of these used whole wards, and would restore internal road connections between the east and west of the proposed Selly Oak constituency. It would achieve this, however, at the cost of a number of changes to proposed constituencies across the south and west of Birmingham that have been actively supported (in particular Edgbaston and Northfield). It would also split the King's Heath and Moseley communities, ties between which we previously received evidence in support of, and result in a largely isolated Bournbrook & Selly Park ward at one end of an east–west orientated constituency spanning to Small Heath ward, when the main road links run north–south. We do not consider the benefits of this alternative outweigh these negative aspects. The second alternative put forward was more limited in scope: including Brandwood & King's Heath ward wholly in Selly Oak constituency, and splitting instead the Billesley ward, to place all but two polling districts of that ward in the Hall Green constituency. While this would again address the narrow 'bottleneck' of the proposed Selly Oak constituency, it would – again – split the King's Heath and Moseley communities, and also split the Billesley community, about which we received significant evidence in consultation, supporting the bringing together of the community into one constituency. We therefore do not consider this alternative to be an overall improvement to our revised proposals. Having considered the evidence put forward for recognition of the Moseley community in the constituency name, we agree, and therefore make a final recommendation for two constituencies: Birmingham Hall Green and Moseley; and Birmingham Selly Oak.

1242. We recognise the continuing concerns of the residents of Castle Bromwich and Smith's Wood wards about lack of ties to Birmingham. While we have not seen an alternative set of boundaries for this area that would produce a better pattern of constituencies overall, we agree that recognising Solihull wards in the constituency name would be appropriate to reflect the distinct identity of these wards, and consistent with our general approach in other constituencies that cross a local authority boundary. We therefore recommend a Birmingham Hodge Hill and Solihull North constituency. Similarly, we have reviewed again the request to rename the two constituencies wholly within the Solihull council area. As the main issue of concern in these

proposals has been the division of the town centre of Solihull, while we have not seen a better alternative set of boundaries, it would be appropriate to recognise the existence of that central area in both constituencies in their names. We therefore recommend two constituencies of: Solihull West and Shirley; and Meriden and Solihull East (the ordering of the names in the latter reflecting the predominantly rural nature of the constituency).

1243. We have considered very carefully the competing arguments in respect of the final two constituencies in the sub-region, and we again visited the areas concerned. Across all three consultations we have seen good evidence of the links of both Oscott/Kingstanding and the Slade Road area with the core area of Erdington. Unfortunately, the whole of both cannot be included in the Erdington constituency while still keeping it within the permitted electorate range, and our recommendations will inevitably disappoint one or other community. After considering all the evidence and the statutory factors, however, we recommend that the whole of Stockland Green ward, together with all of Kingstanding ward and polling districts 4,5,7 and 8 of the Oscott ward, be included in the proposed Birmingham Erdington constituency. The remaining four polling districts of the Oscott ward (1,2,3 and 6) we recommend remain in the Birmingham Perry Barr constituency. While the local ties with Erdington were demonstrated in both options, Oscott (and particularly these westernmost polling districts) is undeniably significantly further geographically; strictly 'internal' transport links south are poor at both the east and west ends of the area under consideration, but the western polling districts of Oscott adjoin the main A4041 Queslett Road, giving easy access into Perry Barr; and, finally, Oscott is already in the existing Perry Barr constituency, so to retain part of it there would see less disruption to the existing constituency.

1244. Our final recommendations for Birmingham and Solihull are accordingly for constituencies of: Birmingham Edgbaston; Birmingham Erdington; Birmingham Hodge Hill and Solihull North; Birmingham Ladywood; Birmingham Hall Green and Moseley; Birmingham Northfield; Birmingham Perry Barr; Birmingham Selly Oak; Birmingham Yardley; Meriden and Solihull East; Solihull West and Shirley; and Sutton Coldfield. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## **Coventry**

### **Initial proposals**

1245. Of Coventry's existing three constituencies, just one (Coventry South) is outside the permitted electorate range, sitting just below the minimum. The wards in Coventry have very high electorates, so it was not possible to transfer a single ward. Our initial proposals therefore exchanged Coventry South's Binley and Willenhall ward for the larger electorate of the Lower Stoke ward in the existing Coventry North East constituency (consequently proposing to change the name of the latter to Coventry East).

### **Consultation on the initial proposals**

1246. In response to the consultation on our initial proposals, there was a mix of opposition and support. Opposition to the initial proposals included two counter proposals, both of which sought to transfer the Woodlands ward into Coventry South, as well as keep both the Upper Stoke and Lower Stoke wards in their existing constituency, but each moved different other wards in order

to do so: one would transfer St. Michael's ward to Coventry North West; the other would move Binley and Willenhall north and move Foleshill ward west into Coventry North West.

1247. There was conflicting evidence received as to the strength of ties between various wards that would be separated or put together in the initial proposals, or in either of the counter proposals. In particular there were differing views about the connection between: Binley and Willenhall ward and Cheylesmore ward; Lower Stoke and Upper Stoke; Lower Stoke, St. Michael's and Cheylesmore wards; and St. Michael's and surrounding wards.

### **Revised proposals**

1248. Our Assistant Commissioners considered all the evidence carefully and also visited the areas. They were persuaded that the ties of St. Michael's ward were stronger with wards to the south and east of it, so it would not be appropriate to accept the alternative proposal that would transfer this ward to Coventry North West constituency. Similarly, they considered that the alternative proposal to move Foleshill ward into Coventry North West would break ties it had with wards to its east, as well as changing all three existing constituencies in Coventry, rather than only two. They accordingly recommended no revisions to our initial proposals for Coventry, and we agreed.

### **Consultation on the revised proposals**

1249. In the consultation on our revised proposals, we received a very low number of responses commenting specifically on the proposed constituencies for Coventry. Of these, however, the overwhelming majority accepted or actively supported the proposals, and no new arguments, evidence or counter proposals were received.

### **Final recommendations**

1250. In light of the general support shown for our proposed Coventry constituencies in the latest consultation, and the lack of any new opposing evidence, argument or alternatives, we recommend the following constituencies: Coventry East; Coventry North West; and Coventry South. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## **Herefordshire**

### **Initial proposals**

1251. Both of Herefordshire's existing constituencies are within the permitted electorate range, but their boundaries could only remain unchanged if we were to split the new local government wards in the county. Realignment of the constituency boundaries to new local government ward boundaries in our initial proposals included Stoney Street ward wholly within North Herefordshire, and Holmer ward wholly within the Hereford and South Herefordshire constituency.

### **Consultation on the initial proposals**

1252. Although our initial proposals received a reasonable level of support, we also received a counter proposal to switch the allocation of the Stoney Street and Holmer wards, i.e. include Stoney Street in Hereford and South Herefordshire, and include Holmer in North Herefordshire. This reflected the importance of the River Wye as a boundary in the county, with Stoney Street ward

lying mostly on the southern side of this significant geographical feature. Responses also noted that this alternative approach would see fewer electors moved from their existing constituency.

### **Revised proposals**

1253. Our Assistant Commissioners recognised the strength of the arguments put forward in respect of the natural geography and the ability to retain a closer approximation of the existing constituencies, and therefore recommended adoption of the counter proposal. We agreed with their reasoning and revised our proposals accordingly.

### **Consultation on the revised proposals**

1254. In the consultation on our revised proposals, we received an extremely low number of responses commenting specifically on the proposed constituencies for Herefordshire. Of these, around half were actively supportive or accepting of the revised proposals. Of the remaining handful of responses, one sought to simply name the constituencies for their biggest urban centres (Hereford, and Leominster and Ledbury, respectively), while three raised a new issue: requesting that the Old Gore ward be transferred to the Hereford and South Herefordshire constituency, due to its connections to Hereford, relative location in the county (more south than many of the wards in the Hereford and South Herefordshire constituency), and noting that the geographical feature of the River Wye means that the area from the hamlet of Foy west has no internal physical connection to the rest of the constituency.

### **Final recommendations**

1255. We have carefully considered the new issue raised concerning the Old Gore ward. This ward is part of the existing constituency, so moving it would entail a substantive change to two constituencies changed otherwise only to realign with changed ward boundaries. A transfer of the ward from the North Herefordshire constituency would take the electorate below the permitted minimum, so another ward would have to be transferred the other way to compensate: while we could select such a ward, we do not consider we have evidence to suggest that transferring a different ward would reflect community ties. Furthermore, we do not believe a splitting of the Old Gore ward would be justified.

1256. In respect of the naming of the two constituencies, while we would normally look to name a constituency for its main population centre(s), the highly rural nature of the vast majority of both these constituencies warrants an exception to that general approach. In addition, there has been extremely limited substantive change to the boundaries of the constituencies, in which circumstances we would generally not look to amend the existing names.

1257. As no other issues, evidence, argument or alternatives have been raised in relation to the remainder of Herefordshire, we accordingly recommend the following two constituencies: Hereford and South Herefordshire; and Herefordshire. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## Shropshire

### Initial proposals

1258. Four of the five existing constituencies in Shropshire (including the Borough of Telford and Wrekin) are outside the permitted electorate range, but our initial proposals were able to move only four wards between constituencies to bring them all within range: two from Shrewsbury and Atcham to Ludlow; and two from North Shropshire to The Wrekin.

1259. We also proposed some name changes to bring them more in line with our naming policy: Ludlow and Bridgnorth; Newport and Wellington; and Shrewsbury.

### Consultation on the initial proposals

1260. In respect of the proposed boundaries, those for Ludlow and Bridgnorth, North Shropshire and Shrewsbury were broadly supported in consultation responses, though we received a counter proposal to keep the Severn Valley ward in Shrewsbury by transferring the Rea Valley ward to Ludlow and Bridgnorth proposed constituency. There was also opposition to the configuration of the proposed Telford, and Newport and Wellington constituencies, where a counter proposal recommended exchanging the Priorslee, and Hadley & Leegomery wards between the two proposed constituencies, on the basis of the ties of the latter ward with Telford, and connections of Priorslee with Shifnal.

1261. We also received significant opposition to two of the proposed names in Shropshire. There was particularly strong local support for the retention of The Wrekin name, as it is a renowned local geographical landmark, with which it was said local residents could identify better than with two relatively small towns. In a similar vein, many responses also felt that large parts of the proposed Ludlow and Bridgnorth constituency did not feel particular affinity to those relatively small population centres, and a more inclusive name for the constituency would therefore be South Shropshire.

### Revised proposals

1262. Our Assistant Commissioners considered the counter proposal to exchange the wards of Severn Valley and Rea Valley. While they recognised the somewhat anomalous position of residents at the extreme north of the Severn Valley ward not being included in the Shrewsbury constituency, they noted that the counter proposal had not received support, whereas the initial proposal had received active support from some respondents located in the south of the Severn Valley ward; they therefore recommended retention of the initial proposals in this case, and we agreed.

1263. The Assistant Commissioners also considered the competing evidence put forward as to whether Priorslee or Hadley & Leegomery ward should be included in the Telford constituency, with the other included in the proposed Newport and Wellington constituency. Overall, they considered that the case to retain Priorslee in the Telford constituency was the stronger, not least as the Telford constituency under this approach would only change to realign with local government ward boundary changes. They therefore recommended retention of the initial proposals, and we agreed.

1264. In respect of names, the Assistant Commissioners recognised that, notwithstanding the Commission's general policy to reference population centres in a constituency name, strength

of local feeling would justify retention of the existing The Wrekin name, and a change to a more inclusive South Shropshire in the respective constituencies. We agreed.

### **Consultation on the revised proposals**

1265. Although there had been little opposition to the proposed North Shropshire constituency in earlier consultation, we received a significant number of responses in the final consultation period to the proposed transfer of the Shropshire council wards of Hodnet and Cheswardine into The Wrekin constituency. This opposition referenced the ties of these wards to the town of Market Drayton (remaining in North Shropshire constituency), and the lack of links to the south.

1266. We also received a significant number of responses from the Horton area (one part of the Hadley & Leegomery ward), stressing their connection to Telford, though as this specifically referenced a proposed transfer of their area into the 'Ercall Magna ward', we believe these responses actually relate to changes of the Telford and Wrekin council ward boundaries, recommended by the separate Local Government Boundary Commission for England.

1267. Finally, we received some further representation opposed to the proposed constituency boundary between Shrewsbury and South Shropshire, and particularly the effect this would have of excluding from the Shrewsbury constituency a small stretch of continuous housing within the A5.

### **Final recommendations**

1268. We have noted the latest consultation responses with evidence of local ties between Hodnet and Cheswardine wards and the North Shropshire town of Market Drayton. North Shropshire constituency must, however, lose a large number of electors in order to bring it within the permitted range. Notwithstanding the local ties to Market Drayton, responses from these two wards did not suggest any viable alternative configuration that would see them retained in the North Shropshire constituency without causing significant disruption to other constituencies and/or breaking local ties elsewhere. As no new evidence, argument or counter proposals were received in respect of the Telford constituency, we therefore recommend no change to our revised proposals for three constituencies of: North Shropshire; Telford; and The Wrekin.

1269. In respect of Shrewsbury and South Shropshire, we have reviewed again where the boundary between these two constituencies should lie, in light of the further representations received about the anomalous position of housing at the far north of the Severn Valley ward, but within the A5 running around the south of Shrewsbury. We remain of the view that an exchange of this ward with the Rea Valley ward would not be appropriate (not least because of the support for initial proposals from the south of the Severn Valley ward), but we also considered the possibility of a split of the Severn Valley ward: a split of the ward along the natural boundary of the A5 would transfer just a few hundred electors from South Shropshire to Shrewsbury, which both proposed constituencies could sustain while remaining within the permitted electorate range. A constituency boundary drawn along the A5 would, however, cut across the boundaries of two parish councils: Atcham and Berrington. Shropshire Council may look to undertake a community governance review of the area in the future – potentially realigning the town and parish council boundaries along the A5 – but in the meantime we are not minded to recommend a split of the Severn Valley ward, and therefore recommend two constituencies of Shrewsbury and South Shropshire unchanged from our revised proposals.

1270. Our final recommendations for Shropshire are therefore for constituencies of: North Shropshire; Shrewsbury; South Shropshire; Telford; and The Wrekin. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## **Staffordshire and the Black Country**

### **Staffordshire**

#### **Initial proposals**

1271. Of the 12 existing constituencies in Staffordshire (including the City of Stoke-on-Trent), five are outside the permitted electorate range. Our initial proposals were able to keep two constituencies (Burton and Cannock Chase) wholly unchanged, and a further four (Lichfield, Newcastle-under-Lyme, Stoke-on-Trent North, and Tamworth) changed only to realign with new ward boundaries.
1272. For the reasons described in the section above concerning sub-division of the region, one constituency had to be shared between Staffordshire and the Black Country, and our initial proposals set out a Kingswinford and South Staffordshire constituency, pairing the south of the county with the Kingswinford area of Dudley council.
1273. As the existing Central and South constituencies of Stoke-on-Trent needed to expand significantly to be brought within the permitted electorate range, this in turn meant that there needed to be significant reconfiguration of the existing Stafford, Stone (renamed to include Great Wyrley), and – to a lesser degree – Staffordshire Moorlands constituencies.

#### **Consultation on the initial proposals**

1274. In consultation on our initial proposals, the boundaries of the proposed constituencies of Burton, Cannock Chase, Newcastle-under-Lyme, Stoke-on-Trent Central, and Stoke-on-Trent North were generally supported.
1275. There was a strong response in opposition to our initial proposals elsewhere in Staffordshire, with many responses particularly opposing the pairing of Kingswinford with South Staffordshire, and the physical distance and lack of connections between Stone and Great Wyrley at the extreme ends of the eponymous proposed constituency. Other responses opposed the inclusion of rural areas of Stafford and Staffordshire Moorlands with built-up areas of Stoke-on-Trent in the proposed Stoke-on-Trent South constituency, while a large number of responses called for the retention of the Streethay area in Lichfield constituency instead of being included in Tamworth.
1276. We received a number of counter proposals. As well as that already noted in the sub-division of the region section (which would treat Staffordshire alone and pair the Black Country with Birmingham), we received three counter proposals that would cross into the Black Country at alternative points: two crossing into Walsall (also impacting Lichfield); and another crossing into Stourbridge.
1277. There were also a number of requests for changes to names received during the consultation process, seeking a change to: Stoke-on-Trent North, Kidsgrove and Talke; Stoke-on-Trent South, Barlaston and Tean; and Burton and Uttoxeter.



## Revised proposals

1278. Our Assistant Commissioners considered carefully what alternative approaches might be possible and more acceptable across Staffordshire. We have already discussed (in the sub-division of the region section above) the consideration of the alternative approach that would treat Staffordshire as a stand-alone sub-region. While recognising the benefits in the south of the county of those counter proposals that would cross into the Black Country in the north, the Assistant Commissioners did not feel that these outweighed the disbenefits of the proposed crossings in the north, in opposition to which we had received a number of responses during consultation.
1279. Considering then the counter proposal to cross into Stourbridge in the south, the Assistant Commissioners noted that, when this counter proposal was followed through, the consequences of the full counter proposal were disruptive to generally supported proposed constituencies in Dudley, and also required the sub-region to include Birmingham and Worcestershire. We agreed that neither of these counter proposals would produce a better overall set of proposals: while arguably an improvement for Staffordshire, they simply shifted the difficulties to other parts of the region and caused more disruption overall than was necessary.
1280. The Assistant Commissioners also looked at whether some of the rural wards of the District of Staffordshire Moorlands might be retained in the eponymous constituency, rather than be included in the Stoke-on-Trent South constituency as proposed, but the very low electorates of the constituencies made this impossible without significant disruption to other parts of Staffordshire. Accordingly they did not recommend a change to the initial proposals in this area.
1281. The Assistant Commissioners also considered the concerns expressed in consultation regarding the distance and lack of ties between Stone and Great Wyrley. While recognising the geographic length of the constituency, and that transport routes from one end to another were not particularly strong, the Assistant Commissioners noted that many settlements throughout the constituency shared a common character, and that those who commented on the pattern of constituencies across the region as a whole had either accepted the constituency as initially proposed, or proposed a similarly extensive Mid Staffordshire constituency as integral to a wider pattern of constituencies across the area. Accordingly they did not recommend any revisions to this proposed constituency.
1282. Considering the request to retain Streethay in Lichfield constituency, the Assistant Commissioners felt there was sufficient justification to recommend a split of the Whittington & Streethay ward in order to achieve this. This was on the basis that Streethay formed a continuation of the built-up area of Lichfield with no clear break, and they were able to recommend a split of the ward using polling districts, and aligning with the Fradley and Streethay civil parish boundary.
1283. Finally, on consideration of the alternative names requested, while recognising that we will often seek to recognise elements of both councils where a constituency crosses a local authority boundary, the Assistant Commissioners felt there was insufficient reason to amend the name of the proposed Stoke-on-Trent North constituency, as its boundaries would only have changed minimally to reflect new ward boundaries. Similarly, they did not feel there were any obvious alternative names to reference all three local authorities represented in the proposed Stoke-on-Trent South constituency, so recommended that it simply be retained. As the constituency boundaries of Burton were proposed to be unchanged from the existing, the Assistant Commissioners were not persuaded to recommend a change of name.

1284. We agreed with all of the recommendations of our Assistant Commissioners in relation to Staffordshire.

### **Consultation on the revised proposals**

1285. In the consultation on the revised proposals, there were few responses in relation to Burton, but a number of these again argued for a recognition of Uttoxeter in the name. There were also very few responses in relation to Cannock Chase, though one or two of those called for Rugeley to be moved out and Great Wyrley to be included in the constituency. The proposed retention of Streethay in Lichfield was well supported, but there was opposition to the continued inclusion of Whittington in the proposed Tamworth constituency.

1286. There were also relatively few responses in respect of Newcastle-under-Lyme, the three proposed Stoke-on-Trent constituencies, and Staffordshire Moorlands. These mostly accepted the proposed constituencies, but included: a request to include more of the Borough of Newcastle-under-Lyme wards in the eponymous constituency; more responses opposed to the inclusion of rural Staffordshire Moorlands wards in the proposed Stoke-on-Trent South constituency; and repeated calls for the recognition of areas beyond Stoke in the names of the proposed Stoke-on-Trent North and South.

1287. Opposition to the proposed Kingswinford and South Staffordshire, and Stone and Great Wyrley constituencies continued in the consultation on the revised proposals, as – to a lesser degree – did opposition to the proposed Stafford constituency. Only one detailed counter proposal was received, however, which relied on an extended sub-region including Shropshire (discussed in the sub-division of the region section above). There was also a request to include Penkridge in the name of the Stone and Great Wyrley constituency, claiming Penkridge as ‘the beating heart of the rural area’.

### **Final recommendations**

1288. In respect of the name of the Burton constituency, we have looked again at whether an addition to the name would be justified. Notwithstanding that the boundaries of the proposed constituency will be unchanged from the existing, we are persuaded by the strength of local feeling displayed through the consultations that there is justification to include Uttoxeter in the name. We are not persuaded of the case to exchange Rugeley for Great Wyrley in the Cannock Chase constituency, on the basis that the perceived benefit of this exchange would be at the cost of changing a constituency that would otherwise be completely unchanged from the existing, and also coterminous with the local authority boundary. We therefore recommend two constituencies of: Burton and Uttoxeter; and Cannock Chase.

1289. We have considered the request to include Whittington as well as Streethay in Lichfield. Transferring the polling district that contains the village of Whittington is possible without seeing either Lichfield or Tamworth fall outside of the permitted electorate range. We do not, however, believe that the case for extending the location of the split is sufficiently strong. Although it would again be possible to align with a civil parish boundary (that of Whittington parish), Whittington is – unlike Streethay – clearly a rural village at some distance from Lichfield, rather than a continuation of Lichfield’s built-up environment: there are a large number of such villages and hamlets in similar situations around England where some evidence of local ties does not in itself justify the splitting

of the ward. We therefore recommend two constituencies of Lichfield and Tamworth unchanged from our revised proposals.

1290. We have reviewed again the request for amendment to the names of the proposed Stoke-on-Trent North and South constituencies. There has been no new argumentation brought forward in the more recent consultation responses to support name changes, and we therefore recommend the Stoke-on-Trent constituencies with names as in our revised proposals: Stoke-on-Trent Central; Stoke-on-Trent North; and Stoke-on-Trent South. Similarly, there has been no new evidence or alternatives put forward in respect to Staffordshire Moorlands, and we therefore recommend that constituency with no changes from our revised proposals.

1291. We have considered the request to include additional wards of Newcastle-under-Lyme council in the constituency of the same name. These would need to be taken from the proposed constituency of Stone, which is already near the minimum of the permitted electorate range. Doing so would therefore trigger an undesirable domino effect of further change and disruption to the constituencies in rural central Staffordshire. We do not therefore propose to make further changes to this constituency and recommend a Newcastle-under-Lyme constituency as in our revised proposals.

1292. Although opposition has continued to the remaining three proposed constituencies in Staffordshire – in particular Kingswinford and South Staffordshire – we have seen no new evidence or alternatives that would not cause significant issues elsewhere. We do not therefore propose to change the boundaries of any of these constituencies. We are, however, persuaded by the request to add Penkridge to the name of the proposed Stone and Wyrley constituency, which will reflect the broad nature of this constituency. We therefore recommend three constituencies of: Kingswinford and South Staffordshire; Stafford; and Stone, Great Wyrley and Penkridge.

1293. Our final recommendations for Staffordshire are therefore for: Burton and Uttoxeter; Cannock Chase; Kingswinford and South Staffordshire; Lichfield; Newcastle-under-Lyme; Stafford; Staffordshire Moorlands; Stoke-on-Trent Central; Stoke-on-Trent North; Stoke-on-Trent South; Stone, Great Wyrley and Penkridge; and Tamworth. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## **Black Country**

### **Initial proposals**

1294. Every constituency in the Black Country is below the permitted electorate range, so it was inevitable that some change would be experienced in every existing constituency. In developing the initial proposals, we sought to respect, as far as possible, the strong and distinct – but often highly localised – different community identities across the area.

1295. In the Borough of Dudley, beyond the Kingswinford and South Staffordshire constituency discussed above, we proposed Dudley, Halesowen, and Stourbridge constituencies centred around the well-known Black Country towns for which they are named, though, due to the relatively low electorate, it was necessary for the proposed Halesowen to also include the Borough of Sandwell ward of Cradley Heath and Old Hill (and one polling district from the Blackheath ward).

1296. In the Borough of Sandwell, we proposed to expand the West Bromwich East constituency southwards to include the St. Pauls ward, and West Bromwich West westwards to include the Borough of Dudley ward of Coseley East. The existing Warley constituency – having lost St. Pauls ward – was then proposed to expand west to take in the Rowley ward and the remainder of the Blackheath ward, and was accordingly proposed to be renamed Smethwick and Rowley Regis.
1297. The electorate of the three existing constituencies in the Borough of Walsall were sufficiently low that our initial proposals set out only two constituencies wholly within the centre and east of the council area: a Walsall constituency covering the south, and a Bloxwich and Brownhills constituency covering the north. The wards in the west of the Borough of Walsall were then proposed to be transferred into the Wolverhampton North East and South East constituencies. This in turn then required the final constituency in Wolverhampton to take in the Oxley ward in the north and the Blakenhall ward in the south, which warranted a slight change of name to Wolverhampton West.

### **Consultation on the initial proposals**

1298. The initial proposals for constituencies in Dudley other than Kingswinford and South Staffordshire attracted a mix of support and opposition. The proposed Stourbridge constituency in particular attracted strong support. Although the proposed Halesowen and Dudley constituencies also received a good degree of active support, we also received specific counter proposals for these areas, though these were themselves subsequently opposed in the secondary consultation stage.
1299. In contrast to this general support for proposed constituencies in the Dudley council area, those proposed in the Borough of Sandwell area attracted strong opposition, and we received a number of counter proposals for the area. There was particular opposition to our proposed transfer of the St. Pauls ward, and two of the main counter proposals moved it back into the proposed Smethwick constituency. Two main counter proposals also proposed combining Wednesbury with Walsall wards, either at Darlaston or at Walsall itself. One main counter proposal would require separating the two Wednesbury wards into different proposed constituencies, while another would combine Tipton and Rowley Regis with Dudley.
1300. Our proposals for the two main constituencies proposed in Walsall drew significant opposition, though also some support. There was particular opposition to the general east–west orientation of the new constituencies: although some good ties were recognised in the northern proposed constituency between Bloxwich and Brownhills, there were said to be far fewer and weaker ties in the southern proposed constituency, between Aldridge and the town of Walsall, as well as opposition to the two named Aldridge wards being placed in different constituencies. Counter proposals generally shared a common approach of a more north–south orientation of the two constituencies. Two of the main counter proposals entailed dividing the four core wards of Walsall town between the two constituencies, while another (mentioned above) would cross the local authority boundary between Walsall and Wednesbury (as well as link Aldridge with Lichfield). A final counter proposal of note suggested a Walsall and Bloxwich constituency, and an Aldridge–Brownhills constituency largely unchanged from the existing, though this approach required a split of the Paddock ward.
1301. In respect of our initial proposals for the three constituencies in Wolverhampton, we received a mix of opposition and support. Opposition to the initial proposals largely focused on the transfer of Blakenhall ward to the Wolverhampton West constituency, as its primary ties were said to be

to the east of the ward, though we did also receive evidence of reasonable ties to the west of the ward as well. There were two main counter proposals received: one would keep Blakenhall with Bilston, but include the Bushbury wards in different constituencies; the other would keep Blakenhall and the Coseley East ward of Dudley in the Wolverhampton South East constituency, and not divide the Bushbury wards.

### **Revised proposals**

1302. The Assistant Commissioners considered the counter proposals put forward for the proposed Halesowen and Dudley constituencies, but were not persuaded that either of them represented an improvement on the initial proposals, noting the opposition they had attracted during the secondary consultation, the consequential disruption they would cause to local ties further across to Birmingham and Sandwell, and the active support that the proposed Stourbridge, Halesowen, and – to a lesser extent – Dudley constituencies had received from many other respondents. Consequently they recommended no revisions to the initial proposal for these three constituencies, and we agreed.
1303. On the basis of the strength of opposition to the constituencies proposed in Sandwell, the Assistant Commissioners were keen to identify some revisions that would secure more support. In the south of the borough, they recognised the strength of the argument for a restoration of the St. Pauls ward to the southern constituency, and in consequence removed the Rowley ward, reflecting evidence received of poor connections between this area and Smethwick. They recommended this constituency accordingly be named simply Smethwick. In the north of the borough they felt it was neither appropriate to divide the Wednesbury wards between constituencies, nor necessary to create a constituency crossing the local authority boundary with Walsall, as counter proposals had suggested. Instead, they recommended both Wednesbury wards be kept together with the Friar Park and Hateley Heath wards in a Tipton and Wednesbury constituency. The remaining Sandwell wards they recommended form a West Bromwich constituency. While recognising a certain lack of connection between the geographical extremes of the latter constituency, overall we agreed with these recommendations, as representing a pattern of constituencies that minimised division of communities across the borough.
1304. In Walsall, the Assistant Commissioners were persuaded that some form of reorientation of the two proposed constituencies onto a more north–south alignment would represent a better reflection of the stronger local ties in the borough, as well as being somewhat closer to the existing constituency configurations, and considered the different alternatives that had been presented. They ultimately recommended, following a site visit to the borough, a minor variation of the counter proposal that required a split of the Paddock ward: they felt a split ward would be justified, as it would enable an Aldridge-Brownhills close to the existing configuration, would avoid a more fundamental division of the four core urban Walsall wards between constituencies, and would also avoid the need for either constituency to cross the Borough of Walsall boundaries. We agreed with this reasoning and proposed two revised constituencies of Aldridge-Brownhills and Walsall and Bloxwich.
1305. In respect of Wolverhampton, the Assistant Commissioners noted the evidence that Blakenhall's ties were mainly east, but there was also evidence of ties to the west. They also took into account opposition expressed to the aspect of one main counter proposal that would require separating the Bushbury wards into different constituencies. While they noted the other main counter

proposal would retain Blakenhall in Wolverhampton South East and not divide Bushbury, they also noted that it had not attracted support from respondents in secondary consultation and would also generate knock-on effects to the pattern of constituencies further south. Overall, they decided there was not a sufficiently strong case to recommend any revisions to the proposals for the three Wolverhampton constituencies, and we agreed.

### **Consultation on the revised proposals**

1306. In the consultation on the revised proposals for the Dudley constituencies beyond Kingswinford and South Staffordshire (considered above), responses were generally favourable. There was a mix of views in relation to the proposed Halesowen, with opposition focused on the removal of Blackheath. No detailed counter proposals were put forward.
1307. In the Sandwell area, the number of responses was relatively low, with opposition to the lack of ties between Blackheath and Smethwick, and the loss of Warley as a constituency name. A few responses opposed the inclusion of the Coseley East ward in the proposed Tipton and Wednesbury constituency, stating the ties of the ward went north or south rather than east. There were also a handful of responses opposed to the lack of connections between the extreme ends of the proposed West Bromwich constituency, but again no detailed counter proposal was received.
1308. There was significant support received for the revised approach to forming the two constituencies in Walsall borough, though a slight amendment was suggested: to split the St. Matthew's ward rather than Paddock ward. There were also a small number of responses seeking a reversion to the initial proposals, or a small variation on those (either an exchange of the Pleck, and Aldridge North and Walsall Wood wards, or a split of the latter).
1309. In respect of Wolverhampton, responses were mixed, with opposition to our proposals focused on the lack of ties between Wolverhampton and Walsall wards in the two eastern constituencies, and further responses asserting the ties between Blakenhall and Bilston that would be broken by including the former in the proposed Wolverhampton West constituency. We did receive a detailed counter proposal, which would rotate the configuration of wards in these three constituencies, so as to both keep the Blakenhall and Bilston wards in the same constituency, and have only one constituency crossing the local authority boundary with Walsall.

### **Final recommendations**

1310. In Dudley and Sandwell, we have previously recognised the unfortunate need to split the Blackheath ward, and that the ties between this area and the north of the proposed West Bromwich constituency are not strong, but have seen no better alternative that resolves these issues without creating more issues elsewhere. Similarly, we have not been persuaded that Coseley East could be included in a constituency with Dudley or Wolverhampton without causing disruption and breaking local ties elsewhere. We therefore recommend six constituencies in these areas unchanged from our revised proposals: Dudley; Halesowen; Smethwick; Stourbridge; Tipton and Wednesbury; and West Bromwich.
1311. In Walsall, we have not been persuaded by the recent requests in some consultation responses to revert to the initial proposals or a slight variation of those. From all the evidence we have seen, Bloxwich has good local ties both east and south, but the revised proposals create two

constituencies more clearly centred around Walsall and Aldridge respectively, and thus preserving local ties to those better overall than the initial proposals or recent variations on those would. We have considered the alternative of splitting the St. Matthew's ward rather than Paddock: they would appear to be of equal merit, but, as the revised proposals have received a good deal of support, we believe the correct approach would be to retain the split in the revised proposals. Our recommendations are therefore for two constituencies unchanged from our revised proposals: Aldridge-Brownhills; and Walsall and Bloxwich.

1312. In respect of Wolverhampton, we have not been persuaded to amend our revised proposals. We have considered very carefully the counter proposal we received that would bring back together Blakenhall and Bilston, as well as leave only one constituency crossing the Wolverhampton-Walsall local authority boundary, as this would appear very attractive on both these counts. The full composition of these three constituencies, however, would be radically different from that in our revised proposals, and may not better reflect community ties. We therefore recommend three constituencies unchanged from our revised proposals: Wolverhampton North East; Wolverhampton South East; and Wolverhampton West.

1313. Our final recommendations for the Black Country are therefore for constituencies of: Aldridge-Brownhills; Dudley; Halesowen; Smethwick; Stourbridge; Tipton and Wednesbury; Walsall and Bloxwich; West Bromwich; Wolverhampton North East; Wolverhampton South East; and Wolverhampton West. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## Warwickshire

### Initial proposals

1314. Four of the six existing constituencies in Warwickshire are within the permitted electorate range, and our initial proposals suggested bringing the other two within the range by simply moving one ward – Budbrooke – from the Warwick and Leamington constituency into Kenilworth and Southam. The Stratford-on-Avon and Rugby constituencies were proposed with boundary changes only to realign with new local government wards, and the Bedworth and North Warwickshire, and Nuneaton constituencies were proposed with completely unchanged boundaries from existing (though we included Bedworth in the name of the former to reflect the local authority crossing).

1315. We did identify an opportunity to more closely align constituency boundaries with local authority boundaries across the county. As this would require a greater degree of change from the existing constituencies than was otherwise necessary, we did not make this approach our formal proposal, but actively invited views on the option in the consultation.

### Consultation on the initial proposals

1316. The four proposed constituencies that would see essentially no change were well supported in consultation, and the possible alternative of greater change to align better with local authority boundaries did not attract much active support.

1317. Though there was some support for the proposed transfer of the Budbrooke ward, there was also strong opposition expressed to this, on the basis of the local ties of the ward to Warwick

particularly (and lack of ties to either Kenilworth or Southam), and the effect the initial proposal would have of creating a Kenilworth and Southam constituency that would completely encircle that of Warwick and Leamington. We received a counter proposal to split the Budbrooke ward, transferring to Kenilworth and Southam constituency only the Hatton Park area, while retaining the rest of the ward in the Warwick and Leamington constituency.

### **Revised proposals**

1318. Our Assistant Commissioners had little difficulty recommending the retention of the initial proposals for the four essentially unchanged proposed constituencies, given the large degree of support expressed for those, and we agreed.

1319. The Assistant Commissioners considered carefully the counter proposal to split the Budbrooke ward, and visited the area as part of their considerations. While they agreed Hatton Park would be a suitable area to transfer to Kenilworth and Southam if the ward were to be split, they did not feel that there was a sufficiently strong case for splitting the ward in the first instance, as the M40 and A46 formed a sizeable and distinct boundary between most of the inhabited areas of the ward and Warwick and Leamington. We agreed with their reasoning, and therefore retained our initial proposals for these two constituencies also.

### **Consultation on the revised proposals**

1320. We received general support and very few responses overall in respect of the four constituencies proposed essentially unchanged. The few opposing responses were mostly individuals who sought a transfer of a ward (different in each case) between constituencies in the north of Warwickshire, or in some cases from the far south of the Stratford-on-Avon constituency into our proposed Banbury or North Cotswolds constituencies. There were, however, a number of responses that requested a reordering of the name of the proposed Bedworth and North Warwickshire constituency, highlighting that around two thirds of the population was located in the latter part.

1321. We received, again, a significant number of responses in opposition to the transfer of the Budbrooke ward to Kenilworth and Southam, though raising no new evidence or alternatives (in fact a large proportion of these responses stressed ties of the Hatton area with Warwick, contrary to the counter proposal previously received). We also received around the same number of responses requesting the transfer of the Radford Semele ward from the Kenilworth and Southam constituency to Warwick and Leamington, largely on the basis of local ties. Finally, in this area, we received a very small number of requests to transfer part of the Red Horse ward into the Stratford-on-Avon constituency, as well as a request to rename Kenilworth and Southam either Mid Warwickshire or South East Warwickshire.

### **Final recommendations**

1322. We have seen no persuasive evidence or support for amending the boundaries of our revised proposals in the north of the county, or in Stratford-on-Avon. Specifically, we do not see sufficient grounds to amend these otherwise essentially unchanged constituencies, and particularly not cross a regional boundary. We are, however, persuaded of the argument to reorder the name of our initially proposed Bedworth and North Warwickshire. We therefore recommend the following



constituencies with boundaries as set out in our revised proposals: North Warwickshire and Bedworth; Nuneaton; Rugby; and Stratford-on-Avon.

1323. In respect of the remaining two constituencies, it remains the case that the whole of Budbrooke ward cannot be included in the Warwick and Leamington constituency, and we have received no new evidence or alternative to justify either a split of the Budbrooke ward, or an alternative ward being transferred out of Warwick and Leamington. We considered the request to transfer Radford Semele from Kenilworth and Southam to Warwick and Leamington. Unlike with Budbrooke, this ward can be included in the Warwick and Leamington constituency without the need to split it. This would represent a degree of additional change to both constituencies from their existing configuration, but we were persuaded by the evidence of local ties, and noted particularly that Radford Semele was in the Warwick and Leamington constituency until the boundaries were last changed. We were not persuaded that there was a sufficiently strong case to split the Red Horse ward in order to transfer the Tysoe area to Stratford-on-Avon, nor – in light of the relatively limited change to the constituency and the extremely low numbers requesting it – were we minded to change the name of the Kenilworth and Southam constituency. We therefore recommend amendments to the boundaries of the following constituencies: Kenilworth and Southam; and Leamington.

1324. Our final recommendations for Warwickshire are therefore for constituencies of: Kenilworth and Southam; North Warwickshire and Bedworth; Nuneaton; Rugby; Stratford-on-Avon; and Warwick and Leamington. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## **Worcestershire**

### **Initial proposals**

1325. Four of the six existing constituencies in Worcestershire are within the permitted electorate range, and three are coterminous with their local authority boundaries. The initial proposals therefore proposed to move only two wards (Dodderhill, and Harvington and Norton) from the existing Mid Worcestershire constituency to the Redditch constituency. We also proposed two name changes to better align with our naming policy: Droitwich and Evesham; and Kidderminster.

### **Consultation on the initial proposals**

1326. Our initial proposals for the four unchanged constituencies were supported, other than significant opposition being received to the proposed name of Kidderminster, where respondents demonstrated strong local support for retention of the existing name of Wyre Forest.

1327. There was a mix of support and opposition to our initial proposals for the remaining two constituencies, with opposition particularly coming from the two wards proposed to transfer into the Redditch constituency. There were two significant counter proposals received: one that would leave Harvington and Norton in Droitwich and Evesham, but transfer into Redditch instead the Alvechurch South ward from Bromsgrove; the other proposed a more radical reorientation of both the West Worcestershire, and Droitwich and Evesham constituencies.

### **Revised proposals**

1328. Taking account of the strong support received, the Assistant Commissioners recommended the retention of the initial proposals in full for Worcester, and a change of name only for our initially proposed Kidderminster, to revert to Wyre Forest. We agreed.
1329. Our Assistant Commissioners recognised the close ties of Harvington and Norton with Evesham, particularly as compared with Redditch, and considered carefully the counter proposals received that aimed to address this issue. They noted that a transfer of Alvechurch South ward to Redditch would divide the village of Alvechurch between constituencies and change the otherwise unchanged constituency of Bromsgrove, which was also coterminous with its local authority boundaries. As this counter proposal had also not received any other support, but had attracted a significant degree of opposition, they did not recommend it. Considering the other counter proposal, the Assistant Commissioners felt it would cause far greater disruption to existing constituencies than the initial proposals, as well as having less regard for local authority boundaries: on this basis, and in light of the support in consultation for the initially proposed West Worcestershire constituency, they again did not recommend adoption of this alternative. We agreed with their reasoning and retained our initial proposals for the remaining four constituencies in Worcestershire.

### **Consultation on the revised proposals**

1330. We received very few consultation responses in relation to the revised proposals across Worcestershire. Of these, there is mostly support for the constituencies as now proposed, with a handful of responses seeking the transfer of wards (or part wards) between constituencies whose boundaries have otherwise been proposed to remain unchanged from existing. The only issue that attracted more than a handful of responses was, again, the local ties between Norton and Harvington, and Evesham. These responses included a counter proposal to keep Harvington and Norton in Droitwich and Evesham, but instead transfer the ward of Lovett and North Claines into Redditch constituency.

### **Final recommendations**

1331. We have not been persuaded of the merit of any of the individual requests to change otherwise unchanged constituencies by the movement of individual wards or part wards.
1332. We have considered the counter proposal to transfer the Lovett and North Claines ward into Redditch constituency instead of the Harvington and Norton ward. We do not agree that this would be an improvement on the revised proposals: not only would many of the residents of the Lovett and North Claines ward likely have as strong a claim to local ties with Droitwich as Harvington and Norton do to Evesham, but it would both create a particularly unusual shape for the Redditch constituency, and also completely detach the wards of Hartlebury and Ombersley from the rest of the Droitwich and Evesham constituency.
1333. Accordingly, we recommend six constituencies for Worcestershire unchanged from our revised proposals: Bromsgrove; Droitwich and Evesham; Redditch; West Worcestershire; Worcester; and Wyre Forest. The areas covered by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.



# Yorkshire and the Humber

1334. Yorkshire and the Humber currently has 54 constituencies. Of these constituencies, 22 have electorates within the permitted range. The electorates of 16 constituencies currently fall below the permitted range, while the electorates of 16 constituencies are above. Our proposals maintain the number of constituencies in the region at 54.

1335. Yorkshire and the Humber comprises the county council area of North Yorkshire (including the unitary authority area of the City of York);<sup>3</sup> the boroughs of the metropolitan areas of South Yorkshire and West Yorkshire; plus the four unitary authorities created from the former county council area of Humberside (East Riding of Yorkshire, Kingston upon Hull, North East Lincolnshire, and North Lincolnshire).<sup>4</sup>

1336. We appointed two Assistant Commissioners for Yorkshire and the Humber – Professor Paul Wiles CB and Suzanne McCarthy – to assist us with the analysis of the representations received during the first two consultation periods. This included chairing public hearings, which were held in the region in order to hear oral evidence directly from the public. The dates and locations of these hearings were:

- Leeds: 10–11 March 2022
- Hull: 14–15 March 2022
- Northallerton: 17–18 March 2022.

## Sub-regions

1337. In formulating our initial proposals, we noted that the electorate of Yorkshire and the Humber of 3,966,500 results in it being entitled to 54 constituencies, the same as the current number. We then considered how this number of constituencies could be split across the region.

1338. We noted that Humberside's electorate of 684,294 means it could be allocated nine constituencies. However, this would have given an average constituency size of only 1,029 below the upper limit of the permitted electorate range, meaning there would be little flexibility in creating constituencies. In addition to geographical constraints caused by the shape of the sub-region, in particular the Humber estuary, this would make it extremely difficult to construct nine constituencies within the boundaries of Humberside. Therefore, we proposed to combine Humberside with South Yorkshire to form a sub-region. Combined, this sub-region has 1,691,686 electors, thus a mathematical entitlement to 23.05 constituencies. We therefore proposed allocating 23 constituencies to a sub-region formed of Humberside and South Yorkshire.

1339. North Yorkshire, with an electorate of 620,874, would have a mathematical entitlement to 8.46 constituencies, which meant it could not be assigned a whole number of constituencies. Therefore it must be grouped with at least one other county. We identified that combining North Yorkshire and West Yorkshire created a sub-region of 2,274,814 electors, resulting in a mathematical

<sup>3</sup> Hereafter together referred to as North Yorkshire.

<sup>4</sup> Hereafter together referred to as Humberside.

entitlement to 30.99 constituencies. Such a grouping also allowed for more flexibility when constructing constituencies in West Yorkshire, where the electorate size of metropolitan borough wards makes it difficult to create constituencies within the permitted electorate range without dividing towns between constituencies. For these reasons, we proposed allocating 31 constituencies to a sub-region comprising North Yorkshire and West Yorkshire.

1340. The use of the sub-regions outlined above was broadly supported during the consultation on the initial proposals. Despite this, we did receive one counter proposal which forwent sub-regions altogether and treated the region as one group of 54 constituencies, while a different counter proposal suggested an alternative arrangement of:

- a sub-region comprising South Yorkshire with the unitary authorities of North Lincolnshire and North East Lincolnshire, as in the initial proposals
- a sub-region comprising North Yorkshire and West Yorkshire, plus the unitary authorities of East Riding of Yorkshire and Kingston upon Hull.

1341. In formulating our revised proposals, we considered that no persuasive evidence had been received to propose alternative sub-regions in Yorkshire and the Humber. While the strength of elements of the alternative sub-regions outlined above were acknowledged, it was not considered that the alternative sub-region arrangement permitted a superior overall constituency arrangement based on the statutory factors.

1342. In response to our revised proposals, we did not receive any further evidence that would justify the use of alternative sub-regions to those we previously adopted in our initial and revised proposals. Therefore, the sub-regions we propose as part of the final recommendations are:

- Humberside and South Yorkshire
- North Yorkshire and West Yorkshire.

## **Humberside and South Yorkshire**

1343. As previously set out, in formulating the initial proposals we grouped Humberside and South Yorkshire into a sub-region of 23 constituencies – one less than the existing arrangement. Of the existing constituencies, ten are within the permitted electorate range, 11 have electorates that are below the range and three have electorates above the range.

1344. This sub-region included one constituency – Doncaster East and Axholme – which crossed the county boundary between South Yorkshire and the North Lincolnshire unitary authority.

## **Humberside**

### **Initial proposals**

1345. Of the ten existing constituencies in Humberside, only two fell within the permitted electorate range: Cleethorpes, and Haltemprice and Howden. Six constituencies fell below the range: Brigg and Goole; Great Grimsby; Kingston upon Hull East; Kingston upon Hull North; Kingston upon

Hull West and Hessle; and Scunthorpe. Two fell above the range: Beverley and Holderness, and East Yorkshire.

1346. Due to the proposed cross-county boundary constituency of Doncaster East and Axholme and the geography of the Humber estuary, River Trent, and regional boundary, the North East Lincolnshire unitary authority plus the remaining North Lincolnshire authority wards formed a self-contained sub-division of the sub-region in the initial proposals, with three constituencies. Meanwhile, the unitary authorities of East Riding of Yorkshire and Kingston upon Hull were allocated six constituencies.
1347. In the North East Lincolnshire unitary authority we proposed a Great Grimsby and Cleethorpes constituency that would bring together the centres and most of the constituent parts of the two towns. It would contain all of the existing Great Grimsby constituency except the Scartho ward, plus three wards from the existing Cleethorpes constituency (Croft Baker, Haverstoe, and Sidney Sussex). We proposed that the remaining five North East Lincolnshire wards be combined with four North Lincolnshire wards in a newly named South Humber constituency. Finally, the existing Scunthorpe constituency would be brought within the permitted electorate range by expanding it northwards to include the ward of Burton upon Stather and Winterton, and westwards to include the ward of Burringham and Gunness.
1348. Within the East Riding of Yorkshire and Kingston upon Hull unitary authorities, we proposed that the existing Kingston upon Hull East constituency be expanded eastwards to include the East Riding of Yorkshire ward of South West Holderness, while the existing Kingston upon Hull West and Hessle constituency was expanded westwards with the addition of the two East Riding of Yorkshire wards of South Hunsley and Tranby. We proposed that the existing Kingston upon Hull North constituency be changed only to realign with new local government ward boundaries.
1349. Three constituencies were then proposed wholly within the unitary authority of East Riding of Yorkshire. A coastal constituency of Bridlington and Holderness would group the town of Bridlington with the remaining Holderness area to the south. The towns of Beverley, Driffild, Market Weighton and Pocklington would be combined in a Beverley and The Wolds constituency. Finally, the proposed Goole and Haltemprice constituency would comprise the remaining nine East Riding of Yorkshire wards, grouping the town of Goole to the south of the River Ouse with the town of Howden to its north, and the communities to the east, up to the outskirts of Hull.

### **Consultation on the initial proposals**

1350. The three constituencies proposed to be wholly within the North Lincolnshire and North East Lincolnshire unitary authorities received a mixed response during the consultation process.
1351. Representations received in response to the proposed Scunthorpe constituency were mostly positive. Conversely, the proposed constituencies of Great Grimsby and Cleethorpes, and South Humber, were strongly opposed during the consultation periods with representations contending that the two towns are highly distinct areas with different identities and socio-economic needs, and for this reason they should be in different constituencies. Additionally, many representations objected to the proposed exclusion of the Scartho ward from a constituency with Grimsby, and the inclusion of the villages of Waltham, New Waltham and Humberston in a constituency with more industrial towns such as Immingham and Barton-upon-Humber, rather than Cleethorpes.

1352. The name of the proposed South Humber constituency was also strongly opposed, with most of the opposition focused on the use of 'Humber' in the name.
1353. A popular counter proposal was received for the composition of constituencies within the North Lincolnshire and North East Lincolnshire unitary authorities, which respondents stated retained the centres of the two towns in separate constituencies: Grimsby would be grouped with Barton-upon-Humber, Brigg and Immingham, while Cleethorpes would be grouped with the villages of Humberston, Waltham and New Waltham to the south.
1354. Moving north of the Humber estuary, the initial proposals for the arrangement of constituencies across Kingston upon Hull were particularly contentious during the consultation process. Significant opposition was received in response to the extension of the constituencies of Kingston upon Hull East, and Kingston upon Hull West and Hessle into the East Riding of Yorkshire. Respondents from the South West Holderness ward referred to the distinct rural character of the communities of the ward compared with east Hull, and the very different problems each area consequently faces. Meanwhile, to the west of Hull, respondents opposed the prospective inclusion of the South Hunsley ward in the proposed Kingston upon Hull West and Hessle constituency, citing a distinct character and vastly different socio-economic setting compared with west Hull.
1355. In the East Riding of Yorkshire unitary authority, we received some opposition to the proposed Goole and Haltemprice constituency, with representations stating that it would stretch too far east-west, grouping communities with very little in common. Respondents also contended that Cottingham would more appropriately be included in a Hull-based constituency due to close physical connections between the areas.
1356. A smaller number of representations were received in opposition to the proposed Bridlington and Holderness constituency, with some respondents contending that there is little in common between the town of Bridlington and the Holderness villages.
1357. Multiple counter proposals were received for the six constituencies covering the East Riding of Yorkshire and Kingston upon Hull unitary authorities, which aimed to rectify some of the issues highlighted during consultation. Many of these proposed different configurations between Kingston upon Hull and the neighbouring East Riding of Yorkshire wards.
1358. Other counter proposals suggested more wholesale change across the two unitary authorities. One such counter proposal suggested splitting a ward in the East Riding of Yorkshire using polling districts that mirror existing parish council boundaries. This allowed for a Beverley and Holderness constituency similar to the existing arrangement, although no longer including the North Holderness ward, and would avoid the inclusion of the South West Holderness ward in the proposed Kingston upon Hull East constituency. The two other Hull-based constituencies would extend west into the East Riding of Yorkshire through the inclusion of the Cottingham North, Cottingham South, Tranby, and Willerby and Kirk Ella wards, while avoiding the inclusion of the South Hunsley ward.

### **Revised proposals**

1359. The Assistant Commissioners acknowledged the strength of opposition to the proposed Great Grimsby and Cleethorpes, and South Humber constituencies, and the support for a counter

proposal in the area. However, following a site visit to the towns and their surroundings, the Assistant Commissioners did not ultimately consider the counter proposal to be superior to the initial proposals and they recommended no change to the composition or name of the proposed Great Grimsby and Cleethorpes constituency.

1360. The Assistant Commissioners were sympathetic to respondents opposed to the proposed transfer of the Scartho ward from the existing Great Grimsby constituency, and accepted that its exclusion from a constituency containing the town centre was not ideal. Nevertheless, they considered that no counter proposal, or alternative arrangements investigated, were able to satisfactorily resolve this issue without significant disruption and breaking local ties elsewhere.
1361. With regard to the North East Lincolnshire villages to the south of Cleethorpes, while the Assistant Commissioners acknowledged that they likely do look to Cleethorpes for their key services and amenities, they considered that the wards containing them have a distinctly more rural character, and noted that the majority of the proposed South Humber constituency would still be largely rural. They also noted that the villages are already included with more industrial areas to the north in the existing Cleethorpes constituency. Following these considerations, the Assistant Commissioners recommended no change to the composition of the proposed South Humber constituency, but in light of the widespread opposition to the name, recommended it be called Brigg and Immingham instead.
1362. We accepted the recommendations of the Assistant Commissioners in full for the three constituencies wholly within the North Lincolnshire and North East Lincolnshire unitary authorities and adopted them as part of our revised proposals.
1363. The Assistant Commissioners also visited Hull and its surroundings to better understand the issues raised there. They noted the objection received from the South West Holderness ward and, although they observed that the main settlements of Hedon and Preston effectively act as dormitory settlements to the City of Hull, they agreed that the ward currently has a distinct character, with a large proportion of it highly rural and sparsely populated.
1364. The Assistant Commissioners were persuaded by the evidence regarding South Hunsley ward being distinct from the City of Hull both in character and demographics. They also considered that the Haltemprice villages (Anlaby; Anlaby Common; Cottingham; Hessle, Kirk Ella; West Ella; and Willerby) have very few ties to Goole and Howden with which they were grouped in the initial proposals, and act as suburbs of the city contained within the A164 ring road.
1365. Having considered the representations and counter proposals received regarding the six constituencies covering East Riding of Yorkshire and Kingston upon Hull, the Assistant Commissioners concluded that the approach put forward in the counter proposal set out in the previous section, that required the splitting of a ward, provided a superior arrangement of constituencies overall. Therefore, they recommended its adoption with a minor adjustment.
1366. Specifically, the Assistant Commissioners recommended that the Wolds Weighton ward be split between constituencies, along polling district boundaries that follow the parish council boundaries. This would allow for the inclusion of the South West Holderness ward in a Beverley and Holderness constituency, as opposed to in the proposed Kingston upon Hull East constituency. The proposed Beverley and Holderness constituency would then be the same as the existing arrangement, though no longer including the North Holderness ward. In turn, the



North Carr ward would be included in the Kingston upon Hull East constituency, rather than in Kingston upon Hull North. To the west of Hull, the Assistant Commissioners recommended that the South Hunsley ward be included in a constituency with the town of Goole, with the Willerby and Kirk Ella ward instead included in the Kingston upon Hull West and Hessle constituency. They also recommended that the two wards comprising the village of Cottingham – Cottingham North and Cottingham South – should be included in the Kingston upon Hull North constituency. The Assistant Commissioners recommended a modification to the counter proposal, which would involve the ward of Central being split, using polling districts, between the Kingston upon Hull North, and Kingston upon Hull West and Hessle constituencies, which would allow for more of the centre of the City of Hull to be included in one constituency.

1367. After considering the evidence received during the consultation process and the Assistant Commissioners' recommendations, we agreed that the counter proposal as set out previously was the superior arrangement in this area and adopted it in its entirety, but for three constituency names. However, we did not agree that the recommended split of the Central ward between the proposed Kingston upon Hull North, and Kingston upon Hull West and Hessle constituencies was required to address the multiple issues raised by other representations, and did not propose this as part of the revised proposals.

1368. Therefore, our revised proposals for the county area of Humberside were for constituencies of: Beverley and Holderness; Bridlington and The Wolds; Brigg and Immingham; Goole and Pocklington; Great Grimsby and Cleethorpes; Kingston upon Hull East; Kingston upon Hull North; Kingston upon Hull West and Hessle; and Scunthorpe.

### **Consultation on the revised proposals**

1369. In response to the consultation on the revised proposals across Humberside, we received a mixture of support and opposition.

1370. The proposed Scunthorpe constituency was unchanged from the initial proposals and, as in previous consultation stages, resulted in very few representations.

1371. The proposed Great Grimsby and Cleethorpes constituency garnered considerably fewer representations than previously, with only one representation proposing the alternative arrangement popular during consultation on the initial proposals.

1372. The proposed Brigg and Immingham constituency continued to be mostly opposed, as it was during the consultation on the initial proposals (the initially proposed South Humber constituency). The majority of the opposition was regarding the inclusion of the suburb of Scartho and the villages of Waltham, New Waltham and Humberston in this constituency, rather than in a constituency with Grimsby and Cleethorpes, respectively. The revised name of Brigg and Immingham appeared to be more popular than the previously proposed name of South Humber. However, some respondents were still opposed to it. Representations stated that the proposed name was not reflective of the whole constituency, and in particular did not acknowledge the southern extent. The most popular alternative name by number of representations was Northern Lincolnshire, in reference to the unitary authorities covered by the proposed constituency.

1373. The revised proposals for the three constituencies covering the Kingston upon Hull unitary authority garnered a mixture of support and opposition. The newly proposed Kingston upon Hull

East constituency was mostly supported, with respondents stating that the transfer of the North Carr ward was superior to the crossing of the local authority boundary to the east of the city through the inclusion of the South West Holderness ward. This was despite a possible division of the Bransholme Estate between constituencies, with respondents stating that the estate is already split between the existing Kingston upon Hull East and Kingston upon Hull North constituencies.

1374. The proposed Kingston upon Hull West and Hessle constituency was also similarly mostly supported. Respondents stated that the Willerby and Kirk Ella ward was a more appropriate fit in the constituency than the South Hunsley ward in the initial proposals, while others contended that it made sense to keep the wards of Willerby and Kirk Ella, and Tranby together in a constituency with the wards of west Hull due to their close physical links. However, some representations were received in opposition to the arrangement, contradicting this view and suggesting the East Riding of Yorkshire wards have a distinct character compared with the west of Hull, and have more in common with areas to their west. A handful of respondents suggested a name change to acknowledge Haltemprice in the constituency name, rather than just Hessle. It was contended that more of the population would identify with this amended name due to the proposed revised constituency boundary containing four distinct parishes of the historic Haltemprice area.

1375. The revised composition of the Kingston upon Hull North constituency also resulted in a mixture of support and opposition. The transfer of the two wards comprising Cottingham to a predominantly Hull-based constituency was mostly opposed. However, a significant number of representations in favour of the arrangement were also received. Those in opposition referenced a distinct character to the large village of Cottingham, more like other East Riding of Yorkshire towns and villages to the west, rather than the City of Hull to the east. The '2014 referendum' on the subject of the extension of the City of Hull also featured heavily in representations, as it did at previous consultation stages. Those respondents in favour of the transfer of Cottingham referenced the close physical links to the Kingston upon Hull wards of Bricknell and University, as well as the close educational ties between the areas.

1376. Although the composition of the proposed Kingston upon Hull North constituency resulted in a mixed response, the proposed name was strongly opposed. Almost 250 representations, including a large petition, were received which suggested a change to acknowledge Cottingham in the constituency name, if the arrangement was unchanged in the final recommendations. Respondents drew parallels to the acknowledgement of Hessle in the existing Kingston upon Hull West and Hessle constituency name.

1377. As during the consultation on the initial proposals, we received many counter proposals for the constituencies wholly or partially within the Kingston upon Hull unitary authority. Many of these counter proposals grouped most of the Haltemprice villages bordering Hull into one constituency. This included one which grouped all five of the wards to the west of Hull within the A164 Humber Bridge-Beverley road with three wards of the existing Kingston upon Hull West and Hessle constituency (Boothferry, Derringham and Pickering) and one from the existing Kingston upon Hull North (Bricknell). The counter proposal then proposed a Kingston upon Hull Central constituency which would straddle the River Hull, and a Kingston upon Hull North constituency covering the north of the unitary authority. Other counter proposals suggested less radical change from the existing arrangement in the city, such as one that retained the Hessle ward in a constituency analogous to the existing Kingston upon Hull West and Hessle constituency, with the other four Haltemprice wards to the west (Cottingham North; Cottingham South; Tranby; and Willerby and

Kirk Ella) included with five wards of the existing Kingston upon Hull North constituency. One representation was also received which suggested the split of the Central ward between the proposed Kingston upon Hull North, and Kingston upon Hull West and Hessle constituencies proposed by the Assistant Commissioners previously, in an attempt to retain more of Hull city centre in one constituency.

1378. Regarding the revised proposals consultation response to the three constituencies wholly within the East Riding of Yorkshire unitary authority, the transfer of the town of Pocklington (Pocklington Provincial ward) to the proposed Goole and Pocklington constituency was the greatest issue in the region, by number of representations. These included a petition of roughly 800 signatories. Respondents highlighted the strong ties between Pocklington and the Yorkshire Wolds area, in particular with the neighbouring market town of Market Weighton. They contended that it was inappropriate to break these ties and include Pocklington in a constituency with areas such as Goole with which it has very few links. The petition argued for a return to the initial proposals which included Pocklington and Market Weighton in a Beverley and The Wolds constituency.
1379. The name of the proposed Goole and Pocklington constituency was also opposed, with East Riding and Rivers being the most popular alternative by number of representations. Other representations contended that Howden or Howdenshire should be acknowledged in the constituency name, while one suggested the name Boothferry and South Hunsley.
1380. The proposed Beverley and Holderness, and Bridlington and The Wolds constituencies resulted in comparatively very few representations, with no standout issues.
1381. We did receive some representations which commented on the boundary between the proposed Bridlington and The Wolds, and Goole and Pocklington constituencies. It was brought to our attention that the parish boundaries of Skirpenbeck and Stamford Bridge parish had been changed and that our proposals would no longer follow the parish boundary. Furthermore, it was noted that the ward boundary of Market Weighton and Pocklington Provincial had been changed to reflect the new parish boundary and restore coterminosity. It was suggested that, if we continued to adopt our revised proposal constituencies, then the boundary in this area should be modified in order to be coterminous with both the parish and ward boundaries.

### **Final recommendations**

1382. Having considered the evidence received regarding the revised proposals across Humberside, we have been persuaded to slightly amend two of the proposed constituencies, as well as two constituency names.
1383. We note the small number of representations received regarding the proposed Scunthorpe constituency, which has also been a feature of previous consultations, and therefore propose retaining it in our final recommendations.
1384. We note the smaller number of representations received regarding the proposed Great Grimsby and Cleethorpes, and Brigg and Immingham constituencies compared with previous consultation stages, but acknowledge the recurrence of some points regarding the grouping of the towns of Grimsby and Cleethorpes, and the transfer of surrounding North East Lincolnshire areas away from their principal towns. Despite this, we do not consider any persuasive new evidence has

been provided to depart from our previous conclusions. Therefore, we make no change to the revised proposals for these constituencies in the final recommendations.

1385. We also acknowledge some continued opposition to the name of the Brigg and Immingham constituency, however, we are not persuaded by any of the alternative names given. We note Brigg and Immingham is more popular than the initially proposed name, and retain this in the final recommendations.
1386. In the East Riding of Yorkshire we acknowledge the strong opposition from residents of the town of Pocklington and the surroundings to their inclusion in the proposed Goole and Pocklington constituency. Due to a lack of viable alternatives received during consultation or identified by us when further investigating this area, we concluded that the arrangement for the three constituencies wholly within the East Riding of Yorkshire would have to be the revised proposals (with a possible minor amendment), or a return to something similar to the initial proposals. Although we are sympathetic to the views regarding the relationship between Pocklington and the wider Yorkshire Wolds area, when considered alongside changes that would be required around Kingston upon Hull, we have concluded that the revised proposals provide the best balance between the statutory factors.
1387. We acknowledge the opposition from some to the transfer of Cottingham to the Kingston upon Hull North constituency. However, we have considered this alongside the support for such an arrangement; evidence regarding the lack of ties between Cottingham and areas in the initially proposed Goole and Haltemprice constituency; and arguments regarding the inclusion of the South West Holderness ward in the proposed Kingston upon Hull East constituency. Altogether we have not been persuaded to diverge from the conclusion that it is more appropriate to cross the Kingston upon Hull unitary authority boundary to the west, rather than the east.
1388. Despite no wide-scale change to the constituencies wholly within the East Riding of Yorkshire, we have been persuaded to amend the split of the Wolds Weighton ward. This amends the boundaries of the Bridlington and The Wolds, and Goole and Pocklington constituencies to follow the new Pocklington Provincial and Wolds Weighton ward boundaries, thus restoring coterminosity between the respective boundaries
1389. We note the relatively small number of representations received regarding the Bridlington and The Wolds, and Beverley and Holderness constituencies and therefore the only change to these constituencies, and the proposed Goole and Pocklington is the amended ward split as described above.
1390. We also make no changes to the proposed names of the three previously mentioned constituencies. We acknowledge the opposition to the proposed Goole and Pocklington name, but we were not persuaded by any of the alternatives provided during the consultation.
1391. Around the Kingston upon Hull unitary authority we acknowledge the range of counter proposals which aimed to retain all, or most of, the Haltemprice villages in one constituency. However, we consider these counter proposals would likely negatively affect community ties within the City of Hull, and also result in greater change from the existing arrangement. Therefore, we make no change to the composition of the three constituencies wholly or partially in the Kingston upon Hull unitary authority in our final recommendations.

1392. However, we are persuaded by the groundswell of opinion to acknowledge Cottingham in the constituency name, and therefore adopt the name Kingston upon Hull North and Cottingham in our final recommendations. We are similarly persuaded by the arguments for acknowledging Haltemprice in the Kingston upon Hull West constituency name, and therefore adopt the name Kingston upon Hull West and Haltemprice in our final recommendations.

1393. Therefore, our final recommendations in Humberside are for constituencies of: Beverley and Holderness; Bridlington and The Wolds; Brigg and Immingham; Goole and Pocklington; Great Grimsby and Cleethorpes; Kingston upon Hull East; Kingston upon Hull North and Cottingham; Kingston upon Hull West and Haltemprice; and Scunthorpe. The areas contained by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## **South Yorkshire**

### **Initial proposals**

1394. Of the 14 existing constituencies in South Yorkshire, eight fell within the permitted electorate range: Doncaster Central; Doncaster North; Don Valley; Penistone and Stocksbridge; Rother Valley; Sheffield Brightside and Hillsborough; Sheffield Hallam; and Wentworth and Dearne. Five constituencies fell below the range: Barnsley Central; Barnsley East; Rotherham; Sheffield Heeley; and Sheffield South East. Only Sheffield Central fell above the range.

1395. In formulating our initial proposals, we began by considering the cross-county boundary constituency that was necessary between Humberside and South Yorkshire. We proposed a Doncaster East and Axholme constituency crossing the county boundary between the City of Doncaster and the unitary authority of North Lincolnshire. This constituency comprised the three wards covering the Isle of Axholme area (Axholme Central, Axholme North and Axholme South) and four City of Doncaster wards, covering the east of the local authority.

1396. Including the three Axholme wards in a constituency with the City of Doncaster enabled the identification of further sub-divisions within South Yorkshire, which supported minimal change to the existing constituencies and a better respect for local government boundaries: the City of Sheffield and the Borough of Barnsley allocated eight constituencies; and the Borough of Rotherham and City of Doncaster (plus the three Axholme wards) allocated six constituencies.

1397. Elsewhere in the City of Doncaster, we proposed that both the existing Doncaster Central and Doncaster North constituencies were changed only to realign with new local government ward boundaries, but with the former changed to be named Doncaster Town. Similarly, within the Borough of Rotherham, the existing constituencies of Rotherham and Rother Valley were changed only to realign boundaries to new local government ward boundaries. The remaining Borough of Rotherham wards were combined with the two remaining City of Doncaster wards (Conisbrough and Edlington & Warmsworth) in the proposed Rawmarsh and Conisbrough constituency.

1398. Across the City of Sheffield and the Borough of Barnsley, we proposed no change to the existing constituencies of Penistone and Stocksbridge, Sheffield Brightside and Hillsborough, and Sheffield Hallam, other than to realign their boundaries to new local government ward boundaries. The electorate of the existing Sheffield Central constituency would be reduced to within the permitted electorate range through the transfer of the Manor Castle ward to the proposed

Sheffield Heeley constituency. In turn, the Richmond ward would be split between the Sheffield Heeley and Sheffield South East constituencies to bring these both within the permitted range. Aside from the Penistone and Stocksbridge constituency, in the remainder of the Borough of Barnsley we proposed a north–south arrangement, comprising the constituencies of Barnsley North and Barnsley South.

### **Consultation on the initial proposals**

1399. The initial proposals for the City of Doncaster were mostly opposed during the consultation periods, although they did receive some general support. The greatest source of contention was the proposed cross-county boundary constituency of Doncaster East and Axholme. In particular, residents of the Thorne & Moorends ward preferred to be included in the proposed Doncaster North constituency rather than the Doncaster East and Axholme constituency. There was also some opposition to the proposed inclusion of the large rural ward of Tickhill & Wadworth with the urban centre of Doncaster in the proposed Doncaster Town constituency.
1400. We received multiple counter proposals that put forward alternative arrangements for the City of Doncaster which attempted to resolve some of the issues highlighted, however, most would result in extensive change across South Yorkshire and relied upon splitting wards.
1401. The greatest source of representations regarding the Borough of Rotherham was the proposed Rawmarsh and Conisbrough constituency, predominantly due to the inclusion of the community of the south of Bramley (Bramley & Ravenfield ward) in this constituency, rather than the Rother Valley constituency. Elsewhere there was also some opposition to the inclusion of the Rother Vale ward in the proposed Rother Valley constituency instead of in Rotherham, and counter proposals suggested the transfer of this ward.
1402. Few representations were received regarding the initial proposals across the boroughs of Barnsley and Sheffield, with the majority being in support.

### **Revised proposals**

1403. The Assistant Commissioners acknowledged the opposition to the proposed arrangement of constituencies across the City of Doncaster and the Isle of Axholme – in particular the opposition to the inclusion of the Isle of Axholme in the cross-county boundary constituency of Doncaster East and Axholme. Despite this opposition, they considered that South Yorkshire and Humberside should continue to be combined as a sub-region to allow for more flexibility when creating constituency arrangements across both county areas. In particular, they noted that, if there was to be no cross-county boundary arrangement, there would be extensive change from the existing arrangement of constituencies across the sub-region – and particularly so across South Yorkshire, where the change proposed would otherwise be minimal.
1404. The Assistant Commissioners also acknowledged opposition to the inclusion of the Tickhill & Wadworth ward in the proposed Doncaster Town constituency, and the Thorne & Moorends ward in the proposed Doncaster East and Axholme constituency. Despite this, the Assistant Commissioners did not consider that the counter proposals better satisfied the statutory factors than the initial proposals did, particularly with regard to respect for the existing arrangement of constituencies and local government boundaries. Having reviewed all of the evidence received from the consultation process, the Assistant Commissioners therefore recommended no change

to the composition of the constituencies across the City of Doncaster and the Isle of Axholme, as we had initially proposed. They did, however, suggest a name change of the proposed Doncaster Town constituency to Doncaster Central to acknowledge that Doncaster had acquired city status since the publication of the initial proposals.

1405. In Rotherham borough, the Assistant Commissioners accepted the reasoning provided at consultation for the inclusion of the Rother Vale ward in the Rotherham constituency, from the proposed Rother Valley constituency, and suggested this ward transfer. Elsewhere, they acknowledged the opposition to the inclusion of part of the community of Bramley in the proposed Rawmarsh and Conisbrough constituency and accepted they likely have closer ties to the proposed Rother Valley constituency. However, they noted that all of Bramley is within the Bramley & Ravenfield ward, which now extends south of the A631 Bawtry Road following changes to local government ward boundaries. As such, the only way to retain the community of the south of Bramley in the Rother Valley constituency would be to include the whole of the Bramley & Ravenfield ward, or split the ward between the proposed Rawmarsh and Conisbrough, and Rother Valley constituencies. The Assistant Commissioners considered that to include the whole ward would precipitate change across a wider area that would likely negatively affect community ties, and they did not consider that this proposal met our criteria for splitting a ward.
1406. The Assistant Commissioners noted the limited opposition to the initial proposals in the Borough of Barnsley and City of Sheffield and the expressed support. Therefore, they considered that there was no significant or compelling reason to amend the constituencies in the two local authorities, and recommended retaining the initial proposals in their entirety across these authorities.
1407. We accepted the recommendations of the Assistant Commissioners in full for the 14 constituencies wholly or partially within South Yorkshire and adopted them as part of our revised proposals. Therefore, our revised proposals for the area were for constituencies of: Barnsley North; Barnsley South; Doncaster Central; Doncaster East and Axholme; Doncaster North; Penistone and Stocksbridge; Rawmarsh and Conisbrough; Rother Valley; Rotherham; Sheffield Brightside and Hillsborough; Sheffield Central; Sheffield Hallam; Sheffield Heeley; and Sheffield South East.

### **Consultation on the revised proposals**

1408. As at other stages of consultation, the revised proposals across South Yorkshire resulted in few representations compared with other areas in the region. The arrangement of constituencies was largely supported in full by those commenting on the pattern of constituencies across the region, although some representations did propose alternative constituency names.
1409. As previously, the pattern of constituencies in the City of Doncaster was mostly opposed by respondents to the consultation. The cross-county boundary nature of the proposed Doncaster East and Axholme constituency was opposed, as it was in the initial proposals, with respondents contending a lack of links between the City of Doncaster and the Isle of Axholme. One representation suggested the full name of the Isle of Axholme should be acknowledged in the constituency name. There were no other significant issues raised regarding the revised proposals in the City of Doncaster during the consultation. The return of the Doncaster Central name was supported by the few representations commenting on it.

1410. The proposed Rotherham and Rother Valley constituencies were mostly supported, including the inclusion of the Rother Vale ward in the former rather than Rother Valley as in the initial proposals. Respondents once again highlighted the links between the Rother Vale ward and the town of Rotherham, and contrasted these with the physical separation from the rest of the Rother Valley constituency. Only one representation was received which opposed the transfer of the ward and proposed a return to the initially proposed arrangement. The proposed Rawmarsh and Conisbrough constituency was mostly opposed due to it crossing the local authority boundary into the City of Doncaster, although this garnered only a small number of representations. Some respondents also opposed the name of the proposed constituency, with most supporting a continued acknowledgement of the village of Wentworth in the constituency name.
1411. As at previous consultation stages, relatively few representations were received in response to the revised proposals across the Borough of Barnsley and City of Sheffield, with no standout issues and no significant new evidence submitted.

### **Final recommendations**

1412. Having considered the evidence received, we do not recommend any changes to the boundaries of the revised proposals for South Yorkshire and the Isle of Axholme.
1413. We acknowledge the continued opposition to the composition of the proposed cross-county boundary constituency of Doncaster East and Axholme, however, we do not consider that any compelling new evidence to change the cross-county arrangement has been received. Therefore, we conclude that South Yorkshire and Humberside should continue to be combined as a sub-region to allow for more flexibility when creating constituency arrangements across both county areas, and that the Isle of Axholme is the most suitable area for such a cross-county boundary constituency. In particular, we consider that, if there was to be no cross-county boundary arrangement, there would be extensive change from the existing arrangement of constituencies across the sub-region – and particularly so across South Yorkshire, where the change proposed would otherwise be minimal. We also consider there to be unpersuasive evidence for us to change the composition of constituencies elsewhere in the City of Doncaster, and therefore we retain the composition of our revised proposals across the local authority.
1414. However, we are persuaded to change the name of the proposed Doncaster East and Axholme constituency to acknowledge the full name of the Isle of Axholme area. Therefore, we have decided to adopt the name of Doncaster East and the Isle of Axholme in our final recommendations.
1415. In the Borough of Rotherham, we note the overall support for the transfer of the Rother Vale ward to the proposed Rotherham constituency, and the limited representations received with regard to any other issues. We acknowledge the representations in opposition to the cross-local authority nature of the Rawmarsh and Conisbrough constituency, but note a lack of viable counter proposals received which resolve this issue. We consider that efforts to avoid a crossing of the local authority boundary between Rotherham and Doncaster would result in wide-scale change across South Yorkshire. We also note that the inclusion of the part of Bramley south of the A631 Bawtry Road in the proposed Rawmarsh and Conisbrough constituency garnered very few representations in the revised proposals consultation, despite being a relatively significant issue at previous consultation stages. As such, we conclude there is no new compelling evidence to modify the pattern of constituencies in this part of the sub-region.



1416. We were also not persuaded by the arguments to rename the proposed Rawmarsh and Conisbrough constituency to acknowledge the village of Wentworth. We consider the proposed arrangement has seen sufficient change from the existing to merit a change in constituency name, and we note that Rawmarsh is considerably larger than Wentworth by population. Therefore, the final recommendations across the Borough of Rotherham are unchanged from our revised proposals.
1417. We considered the relatively small number of representations received regarding both the initial and revised proposals across the Borough of Barnsley and City of Sheffield and therefore retain the revised proposals in their entirety in the final recommendations.
1418. Therefore, our final recommendations in South Yorkshire are for constituencies of: Barnsley North; Barnsley South; Doncaster Central; Doncaster East and the Isle of Axholme; Doncaster North; Penistone and Stocksbridge; Rawmarsh and Conisbrough; Rother Valley; Rotherham; Sheffield Brightside and Hillsborough; Sheffield Central; Sheffield Hallam; Sheffield Heeley; and Sheffield South East. The areas contained by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## **North Yorkshire and West Yorkshire**

1419. As previously set out, in formulating the initial proposals we grouped North Yorkshire and West Yorkshire into a sub-region of 31 constituencies – one more than the existing arrangement. Of the existing constituencies, 12 are within the permitted electorate range, five have electorates that are below the range, and 13 have electorates above the range.
1420. This sub-region included two constituencies which cross the county boundary between North Yorkshire and West Yorkshire: Selby, and Wetherby and Easingwold.

## **North Yorkshire**

### **Initial proposals**

1421. Of the eight existing constituencies in North Yorkshire, three fell within the permitted electorate range: Scarborough and Whitby, York Central, and York Outer. Five constituencies were above the range: Harrogate and Knaresborough; Richmond (Yorks); Selby and Ainsty; Skipton and Ripon; and Thirsk and Malton.
1422. We proposed that the county boundary between North Yorkshire and West Yorkshire be crossed in two areas in the initial proposals. We proposed a Selby constituency that would include the City of Leeds ward of Kippax & Methley with all but two of the wards of the District of Selby, including the town of Selby itself. We also proposed a Wetherby and Easingwold constituency that would consist of two City of Leeds wards (Harewood and Wetherby); the remaining two District of Selby wards (Appleton Roebuck & Church Fenton, and Tadcaster); three District of Hambleton wards (Easingwold, Huby, and Raskelf & White Horse); and six Borough of Harrogate wards. This constituency would stretch from south of Tadcaster in the District of Selby to north of Easingwold in the District of Hambleton, while also including the population centres of Wetherby and Boroughbridge (from the City of Leeds and Borough of Harrogate respectively).

1423. The transfer of the Borough of Harrogate wards of Boroughbridge, Claro and Ouseburn to the proposed Wetherby and Easingwold constituency resulted in a more compact Harrogate and Knaresborough constituency in the initial proposals. Meanwhile, the proposed Skipton and Ripon constituency saw no further change beyond the transfer of the Bishop Monkton & Newby ward to the proposed Wetherby and Easingwold constituency, and realignment to new local government ward boundaries.
1424. To compensate for the inclusion of the three District of Hambleton wards in the proposed Wetherby and Easingwold constituency (Easingwold, Huby, and Raskelf & White Horse), the existing Thirsk and Malton constituency was reconfigured in the initial proposals to extend further westwards. The wards of Bedale and Tanfield would be transferred from the existing Richmond (Yorks) constituency to the Thirsk and Malton constituency. This was the only proposed change to the existing Richmond (Yorks) constituency, as well as realignment to new local government ward boundaries.
1425. The proposed Scarborough and Whitby constituency was wholly unchanged from the existing arrangement under the initial proposals, while the York Central and York Outer constituencies were amended only to realign with new local government ward boundaries.

### **Consultation on the initial proposals**

1426. The cross-county boundary constituencies proposed in this sub-region were contentious. The inclusion of the City of Leeds ward of Kippax & Methley in a predominantly District of Selby-based constituency was widely opposed in representations which stated that there is no commonality between the two areas, with Kippax instead being closely tied to the Leeds town of Garforth. The second cross-county boundary constituency in the sub-region, Wetherby and Easingwold, was also strongly opposed during consultation. Most of the opposition (excluding that regarding the inclusion of the Borough of Harrogate ward of Claro, which is discussed in detail below) made reference to the large geographical size of the proposed constituency and the fact it would cover four separate local authorities, grouping communities with little in common.
1427. A counter proposal was received for the cross-county boundary arrangement which proposed two constituencies that would cover the same wards as the Selby, and Wetherby and Easingwold constituencies in the initial proposals, but which distributed those 31 wards differently between the constituencies. The three City of Leeds wards of Harewood, Kippax & Methley, and Wetherby would be included in a constituency with eight wards comprising the southern 'half' of the District of Selby, covering the villages of Eggborough and Sherburn in Elmet, among others. The remainder of the District of Selby would be grouped with the same Borough of Harrogate and District of Hambleton wards included in the proposed Wetherby and Easingwold constituency.
1428. The proposed inclusion of the Borough of Harrogate ward of Claro in the Wetherby and Easingwold constituency (as opposed to Harrogate and Knaresborough) was highly contentious during the consultation. Representations highlighted the strong connections between the Claro ward and the towns of Harrogate and Knaresborough, and relatively few links to Wetherby and Easingwold. Including the Claro ward in the Harrogate and Knaresborough constituency would have no wider knock-on effects – the initially proposed Wetherby and Easingwold constituency would remain within the permitted electorate range – and this was put forward in counter proposals.

1429. The consultations identified that the proposed transfer of the Bedale and Tanfield wards was highly contentious. Respondents said that these wards are intimately linked to the towns of Northallerton and Richmond, with very few links with the communities of Thirsk and Malton. Counter proposals were received that retained one, or both, of the Bedale and Tanfield wards in the proposed Richmond (Yorks) constituency, by exchanging them with one, or both, of the District of Hambleton wards of Great Ayton and Stokesley.
1430. As well as opposition specifically regarding the Bedale and Tanfield wards, we received some opposition to the proposed Thirsk and Malton constituency more generally. Respondents contended the constituency would be too large geographically and encompass too large a variety of communities. Meanwhile, aside from consideration of which wards to transfer between the Richmond (Yorks) and Thirsk and Malton constituencies, we received few representations about the former. Despite this, some respondents opposed the constituency name.
1431. Very few representations were received regarding the Scarborough and Whitby, and Skipton and Ripon constituencies, while the arrangement within the City of York unitary authority of York Central and York Outer was mostly supported.

### **Revised proposals**

1432. The Assistant Commissioners considered that the counter proposal that grouped the wards of the initially proposed cross-county boundary constituencies into a different arrangement had merit, and would likely be superior to the initial proposals with regard to respect for local government boundaries. However, they had concerns regarding the unusual shape of the proposed Selby and Easingwold constituency, and the poor travel and transport connectivity within it. They also questioned the level of community ties between the City of Leeds wards of Wetherby and Harewood and the communities in the south of the District of Selby. Therefore, on balance, they concluded the initial proposals were superior overall with regard to the statutory factors, and did not propose any changes to the Selby, and Wetherby and Easingwold constituencies.
1433. The Assistant Commissioners were persuaded by the extensive evidence presented in the representations for transferring the Claro ward from the Wetherby and Easingwold constituency to the proposed Harrogate and Knaresborough constituency and recommended this to us. They did not recommend any further change to the Harrogate and Knaresborough constituency.
1434. Regarding the transfer of the Bedale and Tanfield wards to the Richmond (Yorks) constituency from Thirsk and Malton, the Assistant Commissioners acknowledged that these wards likely have closer links to the towns of Northallerton and Richmond, rather than with the population centres of the proposed Thirsk and Malton constituency. Despite this, the Assistant Commissioners did not recommend any change to the composition of either the proposed Richmond (Yorks) or Thirsk and Malton constituencies. This was due to the lack of any counter proposal that they considered to be superior to the initial proposals with regard to the statutory factors. However, they accepted the arguments put forward in opposition to the name of the proposed Richmond (Yorks) constituency, and therefore recommended the name be changed to Richmond and Northallerton.
1435. In view of the limited opposition to the proposed Scarborough and Whitby, Skipton and Ripon, York Central, and York Outer constituencies, the Assistant Commissioners recommended no change to the compositions or names of these constituencies.

1436. We accepted the recommendations of the Assistant Commissioners in full for the nine constituencies wholly or partially within North Yorkshire and adopted them as part of our revised proposals. Therefore, our revised proposals for the county council area were for constituencies of: Harrogate and Knaresborough; Richmond and Northallerton; Scarborough and Whitby; Selby; Skipton and Ripon; Thirsk and Malton; Wetherby and Easingwold; York Central; and York Outer.

### **Consultation on the revised proposals**

1437. The transfer of the Claro ward to the proposed Harrogate and Knaresborough constituency was mostly supported, for the same reasons regarding its links to the principal towns as heard during earlier stages of consultation. Despite this, a smaller number of representations were received in opposition due to the relationship between the Claro and Boroughbridge wards within the new North Yorkshire unitary authority structure, which it is suggested would be broken by the revised proposals arrangement. Multiple respondents suggested we revert to our initial proposals in respect of the Claro ward.

1438. The proposed cross-county boundary constituencies of Selby, and Wetherby and Easingwold continued to be opposed, for much the same reasons outlined during consultation on the initial proposals. Respondents continued to contend that there are few links between the District of Selby and the City of Leeds ward of Kippax & Methley. The proposed Wetherby and Easingwold constituency was strongly opposed, particularly from respondents in the District of Hambleton wards of Easingwold, Huby, and Raskelf & White Horse. These representations contended that these areas have few links with the West Yorkshire wards (Harewood and Wetherby) in the proposed constituency and would instead be better included in a constituency with Thirsk and Malton, as they are currently.

1439. Despite the opposition detailed above, we also received a significant number of representations in favour of the cross-county boundary arrangement. These representations contended that there are, in fact, links between the areas of West Yorkshire and North Yorkshire that are proposed to be grouped. Respondents also suggested that the proposed arrangement was superior to the counter proposal considered from the initial proposals consultation. Representations stated that, as a historic market town, Wetherby has more in common with areas in the proposed Wetherby and Easingwold constituency than compared with the former industrial areas in the south of the District of Selby, around Eggborough.

1440. We received one new counter proposal for the cross-county boundary arrangement between North Yorkshire and West Yorkshire. This avoided the inclusion of the Kippax & Methley ward in a cross-county boundary constituency, instead including it in a predominantly Borough of Wakefield-based constituency. A proposed Selby constituency would subsequently include all of the wards of the District of Selby plus part of the Borough of Harrogate ward of Marston Moor. The rest of this ward would be included in a revised Wetherby and Easingwold constituency, similar to the proposed but with the addition of the City of Leeds ward of Cross Gates & Whinmoor – currently in the existing Leeds East constituency.

1441. The transfer of the Bedale and Tanfield wards to the proposed Thirsk and Malton constituency continued to be highly contentious, resulting in the most representations in North Yorkshire. The points raised were similar to those previously heard during consultation on the initial proposals: namely that Bedale and Tanfield have close ties with Northallerton and the Yorkshire Dales to the west, rather than with the North York Moors to the east. One representation also stated that the

Bedale and Tanfield wards are not uniquely linked, and it would be appropriate to split them into different constituencies. The respondent suggested a new counter proposal which would involve the transfer of the Bedale ward to the proposed Richmond and Northallerton constituency, to be replaced in the proposed Thirsk and Malton constituency by parts of the Great Ayton and Osmotherley & Swainby wards.

1442. The remaining proposed constituencies in North Yorkshire garnered significantly less representations, as they did during previous rounds of consultation. The addition of Northallerton to the Richmond and Northallerton constituency name was mostly welcomed, although a couple of respondents suggested the existing name of Richmond (Yorks) be retained. Some respondents also argued that, as the larger town by population, Northallerton should come first in the name.
1443. The arrangement within the City of York unitary authority was mostly uncontentious. However, a few representations contended that the Dringhouses & Woodthorpe ward should be included in the York Central constituency. No significant issues were raised regarding the proposed Skipton and Ripon constituency, while the proposed Scarborough and Whitby was wholly supported by the small number of representations it garnered.

### **Final recommendations**

1444. Having considered the evidence received, we do not recommend any changes to the boundaries or names of the revised proposals for North Yorkshire.
1445. We acknowledge the continued opposition to the cross-county boundary constituencies of Selby, and Wetherby and Easingwold, however, we do not consider that any compelling new evidence to change the arrangement, or superior counter proposals, have been received. We consider that any change to the cross-county boundary arrangement would result in an inferior composition overall, based on the statutory factors. We also note the support for the revised proposal arrangement over the counter proposal considered by the Assistant Commissioners, on which we had specifically invited views. Therefore, we retain both the proposed Selby, and Wetherby and Easingwold constituencies in the final recommendations.
1446. As at previous consultation stages, we acknowledge the strength of opposition to the inclusion of the Bedale and Tanfield wards in the proposed Thirsk and Malton constituency. Despite this, we do not consider persuasive new evidence has been received to modify this constituency and we conclude that the proposed arrangement best reflects the statutory factors. We are not persuaded by counter proposals that sought to separate either the Bedale and Tanfield, or Great Ayton and Stokesley wards, or the transfer of the latter two to the proposed Thirsk and Malton constituency. We note these two wards are geographically separated from the Thirsk and Malton constituency by the North York Moors. We are also not persuaded by the arguments for reordering the name of the proposed Richmond and Northallerton constituency. Therefore, we retain our revised proposals as our final recommendations for the constituencies of Richmond and Northallerton, and Thirsk and Malton.
1447. We note that, despite some opposition, the transfer of the Claro ward to the proposed Harrogate and Knaresborough constituency was mostly supported, and therefore we retain this revised proposal in the final recommendations.

1448. We acknowledge some suggestions that the Dringhouses & Woodthorpe ward should be included in the York Central constituency, from York Outer. However, we note that this could not be achieved without wider consequential changes. Furthermore, we note our proposals largely reflect the existing pattern of constituencies in the City of York and were supported by other responses. Therefore, we retain the proposed York Central and York Outer constituencies in the final recommendations as per our revised proposals.
1449. We note the proposed Scarborough and Whitby, and Skipton and Ripon constituencies have resulted in comparatively few representations throughout the consultation periods, and therefore retain them both in the final recommendations.
1450. Therefore, our final recommendations in North Yorkshire are for constituencies of: Harrogate and Knaresborough; Richmond and Northallerton; Selby; Scarborough and Whitby; Skipton and Ripon; Thirsk and Malton; Wetherby and Easingwold; York Central; and York Outer. The areas contained by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.

## **West Yorkshire**

### **Initial proposals**

1451. Of the 22 existing constituencies in West Yorkshire, nine were within the permitted electorate range: Bradford East; Bradford West; Halifax; Hemsworth; Keighley; Leeds North East; Pudsey; Shipley; and Wakefield. Eight constituencies were above the range: Batley and Spen; Calder Valley; Colne Valley; Dewsbury; Elmet and Rothwell; Leeds Central; Morley and Outwood; and Normanton, Pontefract and Castleford; while five were below the range: Bradford South; Huddersfield; Leeds East; Leeds North West; and Leeds West.
1452. Within the City of Bradford we proposed no change to the existing Bradford East constituency, and only minor realignment to new local government ward boundaries in the Keighley and Shipley constituencies. We proposed only the exchange of two wards – Clayton and Fairweather Green, and Great Horton – between the Bradford West and Bradford South constituencies, which would bring them both within the permitted electorate range.
1453. Within the boroughs of Calderdale and Kirklees, we proposed that the Hipperholme and Lightcliffe ward be transferred from the existing Calder Valley constituency to a proposed Batley and Hipperholme constituency – based largely on the existing Batley and Spen constituency. We also proposed the exchange of four wards between the Calder Valley and Halifax constituencies to bring them both within the permitted electorate range. To compensate for the inclusion of the Hipperholme and Lightcliffe ward in Batley and Hipperholme, the Heckmondwike ward was included in a proposed Dewsbury constituency. This constituency also included part of the Dalton ward to bring it within the permitted electorate range. We proposed that the Dalton ward be split using polling districts, with the area around Kirkheaton being included in the proposed Dewsbury constituency, and the rest of the ward, centred on the Rawthorpe area, remaining in the Huddersfield constituency. To compensate for the inclusion of the Kirkheaton area in the Dewsbury constituency, we proposed that the Crosland Moor and Netherton ward be included in the Huddersfield constituency from the existing Colne Valley constituency. This would bring both of the constituencies within the permitted electorate range. The only further change proposed

to the existing Colne Valley constituency would be to realign its boundaries with changes to local government ward boundaries. The two remaining Kirklees district wards (Denby Dale and Kirkburton) would be grouped with four City of Wakefield wards in the proposed Ossett and Denby Dale constituency.

1454. Within the City of Wakefield we proposed that the Normanton ward be removed from the existing Normanton, Pontefract and Castleford constituency, and the constituency be renamed Pontefract and Castleford accordingly. The Normanton ward would be transferred to the existing Hemsworth constituency in our initial proposals, while the Wakefield South ward would no longer be included, thereby bringing Hemsworth within the permitted electorate range: we consequently also proposed changing the name of the constituency to Normanton and Hemsworth to reflect these changes. In our proposals, the Wakefield South ward would be included with three more City of Wakefield wards (Horbury and South Ossett, Ossett, and Wakefield Rural) and two Borough of Kirklees wards (Denby Dale and Kirkburton) in the Ossett and Denby Dale constituency, as described previously. The remaining five City of Wakefield wards were grouped with the City of Leeds ward of Rothwell to create our proposed Wakefield constituency.

1455. Seven constituencies were proposed wholly within the City of Leeds in the initial proposals. The Leeds North East constituency would be unchanged other than for minor realignment due to new local government ward boundaries. We proposed a Pudsey constituency that would comprise the Calverley & Farsley, and Pudsey wards of the existing Pudsey constituency, plus the Bramley & Stanningley, and Farnley & Wortley wards, currently within the existing Leeds West constituency. We proposed a Leeds North West constituency that would consist of the Guiseley & Rawdon, and Horsforth wards, currently within the existing Pudsey constituency, plus the two wards of Adel & Wharfedale, and Otley & Yeadon, currently within the existing Leeds North West constituency.

1456. We proposed that the Middleton Park ward be transferred from the existing Leeds Central constituency, while the west of the Gipton & Harehills ward, centred on Harehills, would be included in it, following a split of this ward on polling districts between the proposed Leeds Central and Leeds East constituencies. The remainder of the Gipton & Harehills ward, centred on Gipton, would remain in our proposed Leeds East constituency, which we also proposed would extend to the south-east with the addition of the Garforth & Swillington ward. This, along with minor changes to realign the constituency boundary with new local government ward boundaries in the Whinmoor area, would bring the constituency within the permitted electorate range. The Middleton Park ward, which would no longer be included in the Leeds Central constituency, was included in our proposed Morley constituency, which also contained the wards of Ardsley & Robin Hood, Morley North, and Morley South. Finally, we proposed a Headingley constituency that comprised two wards from the existing Leeds North West constituency (Headingley & Hyde Park, and Weetwood), and two from the existing Leeds West constituency (Armley and Kirkstall).

### **Consultation on the initial proposals**

1457. The initial proposals for the City of Bradford received a mixture of support and opposition during the consultation periods. One of the most significant issues regarded the exchange of wards between the proposed Bradford South and Bradford West constituencies, which respondents considered would damage community cohesion. A number of representations also raised the issue of the division of the community of Wibsey between the Bradford South and Bradford West constituencies in the initial proposals.

1458. Multiple representations proposed splitting a ward in the City of Bradford to avoid the necessity of exchanging wards between Bradford South and Bradford West. Many suggested that just one polling district be included in the proposed Bradford South constituency from a neighbouring ward, to bring both constituencies within the permitted electorate range. Polling district 18H from the Little Horton ward was identified in some representations as the most appropriate polling district to be included due to supposed links with communities in the existing Bradford South constituency.
1459. Elsewhere in the City of Bradford significant support was received for maintaining the Shipley constituency with only minimal change to align with new local government ward boundaries, while the majority of respondents approved of the minimal changes to the proposed Keighley constituency, but suggested it would be better named Keighley and Ilkley.
1460. The initial proposals for the seven constituencies either wholly or partially within the boroughs of Calderdale and Kirklees were widely opposed during the consultation. The most contentious proposed constituency across the whole Yorkshire and the Humber region was Batley and Hipperholme, with the majority of the opposition centred on the inclusion of the Borough of Calderdale ward of Hipperholme and Lightcliffe in a constituency with the Borough of Kirklees town of Batley and the communities of the Spen Valley. The exclusion of the Heckmondwike ward from the proposed Batley and Hipperholme constituency was also strongly opposed during the consultation, with respondents stating it has close links with communities across the existing Batley and Spen constituency.
1461. In the Borough of Calderdale, the proposed constituencies of Calder Valley and Halifax were mostly opposed. Representations contended that they linked areas with no community ties, particularly Brighouse and Halifax, while breaking existing links between areas currently in the same constituency, in particular between Sowerby Bridge and Halifax, and Warley and Halifax.
1462. Multiple counter proposals sought to avoid the inclusion of the Hipperholme and Lightcliffe ward in a predominantly Borough of Kirklees-based constituency. This could be achieved either by crossing the local authority boundary in a different area or, instead, by splitting a ward between the Calder Valley and Halifax constituencies, thus avoiding a cross-local authority boundary constituency altogether.
1463. The initial proposals for the Dewsbury constituency also proved to be contentious, with the large majority of the opposition received from the part of the Dalton ward that would be included within the constituency. Residents of this area stated that they have very few links to the town of Dewsbury, and should remain in a constituency with Huddersfield. The proposed Huddersfield constituency itself was similarly opposed with almost all of the opposition related to the proposed transfer of the Crosland Moor and Netherton ward to the Huddersfield constituency, from the Colne Valley constituency.
1464. The representations received regarding the proposed Ossett and Denby Dale constituency were more balanced between opposition and support. Some respondents suggested that the constituency grouped communities with few ties, and broke links within the City of Wakefield. Others supported the constituency on the grounds that it would group similar towns and villages. Several representations suggested a change of the constituency name due to it not being representative of many of the communities within the proposed constituency.



1465. We received multiple counter proposals for some, or all, of the seven constituencies either wholly or partially within the boroughs of Calderdale and Kirklees. Some of these proposed extensive changes to the arrangement across Kirklees, precipitated by a new cross-local authority boundary constituency with Calderdale. Others proposed multiple ward splits across the boroughs in an attempt to resolve some of the issues discussed above.
1466. Very few representations were received during the consultation process concerning the two proposed constituencies wholly within the City of Wakefield local authority: Normanton and Hemsworth, and Pontefract and Castleford. However, the cross-local authority boundary constituency of Wakefield was considerably more contentious. Almost all of the opposition regarded the inclusion of the City of Leeds orphan ward of Rothwell.
1467. The initial proposals in the City of Leeds received a mixed response during consultation. We received very few representations regarding the proposed Leeds Central, Leeds North East, and Pudsey constituencies, while the proposed Leeds North West constituency was mostly supported. The proposed Leeds East constituency was the most contentious wholly within the local authority. Respondents opposed the proposed division of the Gipton & Harehills ward, and the subsequent exclusion of the Harehills community from the Leeds East constituency, as well as the inclusion of the Garforth & Swillington ward in the constituency. It was contended that the proposals would divide the east Leeds community and harm community cohesion.
1468. The proposed Morley constituency was also opposed, with most of the representations received objecting to the proposed inclusion of the Middleton Park ward, which it was suggested had poor links to the rest of the constituency, and would be more suitably included in the Leeds Central constituency.
1469. The proposed Headingley constituency was also mostly opposed with the majority of representations objecting to the inclusion of the Armley ward. A smaller number of representations were also received that opposed the inclusion of the Weetwood ward.
1470. Multiple counter proposals were received for some, or all, of the seven constituencies wholly within the City of Leeds. Most involved simple transfers of individual wards between constituencies to resolve some of the issues raised regarding the arrangement to the west of the city. Others proposed more widespread change, particularly in an effort to avoid the division of the community of Harehills from the Leeds East constituency.

### **Revised proposals**

1471. In the City of Bradford, the Assistant Commissioners acknowledged the concerns regarding community cohesion and the breaking of community ties that could result from the exchange of wards between the initially proposed Bradford South and Bradford West constituencies. They therefore recommended adopting a counter proposal that would return the constituencies of Bradford East, Bradford South and Bradford West to the existing arrangement, other than the transfer of the 18H polling district from the Bradford East ward of Little Horton to the proposed Bradford South constituency. They recommended no change to the names of the three constituencies involved.
1472. Elsewhere in Bradford, the Assistant Commissioners were persuaded by the widespread support for retaining the proposed Keighley and Shipley constituencies which were changed only to

realign with new local government ward boundaries, and as such recommended no change to their composition. They did, however, accept the strong support for the Keighley constituency name to be amended and therefore recommended that it be renamed Keighley and Ilkley. We agreed with the Assistant Commissioners' suggestions for the City of Bradford, and adopted them as our revised proposals.

1473. The Assistant Commissioners acknowledged the widespread opposition to the initial proposals for the seven constituencies wholly or partially within the boroughs of Calderdale and Kirklees, and the numerous and wide-ranging counter proposals for alternative constituencies. In particular, they noted the strength of opposition to the proposed inclusion of the Hipperholme and Lightcliffe ward in a cross-local authority boundary constituency with Batley and the Spenn Valley communities. They decided to visit the area to better understand the issues, and their observations accorded with the criticisms of the initial proposals that were heard during the consultation.
1474. The Assistant Commissioners considered that an alternative arrangement for Calderdale and Kirklees boroughs which involved the split of three wards between constituencies had the most merit of any counter proposal received, or various other possible alternatives investigated by them for the area. Accordingly, they recommended to us that this counter proposal be adopted for the composition of constituencies wholly or partially within Kirklees borough, minus the Colne Valley and Huddersfield constituencies (which they recommended maintaining unchanged from the initial proposals).
1475. The counter proposal recommended by the Assistant Commissioners involved a Spenn Valley constituency that comprised the wards of Birstall and Birkenshaw, Cleckheaton, Heckmondwike, Liversedge and Gomersal, and Mirfield, plus polling district DA06 of the Dalton ward (which covers the communities of Kirkheaton and Upper Heaton). They recommended a Dewsbury and Batley constituency comprising the wards of Batley East, Batley West, Dewsbury East, Dewsbury South, and Dewsbury West, plus four polling districts of the Kirkburton ward, covering the north of the ward. Finally, no further change to the composition of the Ossett and Denby Dale constituency was recommended, other than the transfer of four polling districts of the Kirkburton ward to the Dewsbury and Batley constituency (as described above). The Assistant Commissioners recommended the name of this constituency be changed to Wakefield West and Denby Dale, being persuaded by the comments that the initially proposed name was not sufficiently representative of many of the communities in the City of Wakefield part of the proposed constituency.
1476. In the Borough of Calderdale, the Assistant Commissioners recommended splitting the Ryburn ward between the proposed Calder Valley and Halifax constituencies, with the three polling districts covering the town of Sowerby Bridge and the village of Triangle (MB, MC and MD) being included in the latter.
1477. We agreed with the recommendations of the Assistant Commissioners as described above, and proposed them in their entirety as our revised proposals for the constituencies wholly or partially within the boroughs of Calderdale and Kirklees.
1478. Regarding the City of Wakefield, the Assistant Commissioners acknowledged the opposition to the cross-local authority element of the proposed Wakefield constituency. However, they

considered that very few counter proposals received for this area adequately considered the consequential effects to the wider West Yorkshire arrangement of constituencies, and that none were superior to the initial proposals based on the statutory factors. They also noted the limited number of representations received regarding the proposed Normanton and Hemsworth, and Pontefract and Castleford constituencies. Therefore, they recommended no change to these constituencies, or the proposed Wakefield constituency, from the initial proposals. We agreed with the conclusions reached by the Assistant Commissioners and therefore proposed no change to the composition or names of the constituencies of Normanton and Hemsworth, Pontefract and Castleford, and Wakefield in our revised proposals.

1479. In the City of Leeds, the Assistant Commissioners acknowledged the significant opposition regarding elements of the seven constituencies wholly within the local authority in the initial proposals. In particular, they noted the strong objections to the removal of the Harehills community from the proposed Leeds East constituency, and the inclusion of the Garforth & Swillington ward. The Assistant Commissioners visited the area. They acknowledged that the proposed division of the Gipton & Harehills ward did not follow any clear physical boundary, whereas the Garforth & Swillington ward is clearly separate from east Leeds. Despite this, although many representations put forward an alternative arrangement for Leeds East, the Assistant Commissioners considered that few sufficiently accounted for the consequential effects on neighbouring constituencies, and none were superior to the initial proposals. Therefore, they did not recommend any change to the Leeds East constituency as initially proposed.
1480. Elsewhere in Leeds, the Assistant Commissioners recommended adopting a counter proposal received for the Headingley, Leeds Central, Morley, and Pudsey constituencies, although they recommended no change to the names of those constituencies as initially proposed. The counter proposal involved the transfer of the Armley ward from the proposed Headingley constituency to Pudsey, the Little London & Woodhouse ward from the proposed Leeds Central constituency to Headingley, the Farnley & Wortley ward from the proposed Pudsey constituency to Morley, and the Middleton Park ward from the proposed Morley constituency to Leeds Central. Cognisant of the small number of representations regarding the proposed Leeds North East constituency, the Assistant Commissioners recommended no change to its composition or name.
1481. We agreed with the Assistant Commissioners' suggestions for the constituencies of Headingley, Morley, and Pudsey, and for there to be no change to the proposed Leeds North East and Leeds North West constituencies, and adopted these in our revised proposals. We also agreed with the proposed exchange of the Little London & Woodhouse ward for the Middleton Park ward in the Leeds Central constituency, and adopted this in our revised proposals, although in addition to further change to this constituency, which is detailed below.
1482. We considered the evidence received that our initial proposals broke community ties in east Leeds to be persuasive, and therefore we investigated alternative configurations. We proposed an arrangement which retained all of the Gipton & Harehills ward in the Leeds East constituency, and instead split the Temple Newsam ward between the Leeds Central and Leeds East constituencies. Therefore, our revised Leeds Central constituency consisted of the wards of: Beeston & Holbeck; Burmantofts & Richmond Hill; Hunslet & Riverside; Middleton Park; and eight polling districts from the Temple Newsam ward (covering the areas of Halton and Halton Moor). Our revised Leeds East constituency consisted of the wards of: Cross Gates & Whinmoor; Garforth & Swillington; Gipton & Harehills; Killingbeck & Seacroft; and the remaining four polling districts of Temple Newsam

ward (covering the areas of Colton and Whitkirk). While we acknowledged the possible limitations of this arrangement, we considered it was the best alternative to the initial proposals that we were able to identify, and we welcomed views on the revised pattern during further consultation.

1483. Therefore, our revised proposals for the area of West Yorkshire were for the constituencies of: Bradford East; Bradford South; Bradford West; Calder Valley; Colne Valley; Dewsbury and Batley; Halifax; Headingley; Huddersfield; Keighley and Ilkley; Leeds Central; Leeds East; Leeds North East; Leeds North West; Morley; Normanton and Hemsworth; Pontefract and Castleford; Pudsey; Shipley; Spen Valley; Wakefield; and Wakefield West and Denby Dale.

### **Consultation on the revised proposals**

1484. The response to the revised proposals across West Yorkshire varied widely. In some local authorities the proposals were far less contentious than the initial proposals, however, elsewhere, new issues were identified.

1485. Within the City of Bradford, the transfer of the 18H polling district of the Little Horton ward from Bradford East to the proposed Bradford South constituency was strongly opposed. The opposition included a petition of roughly 100 signatories contending there is no commonality between the community of Marshfields in the 18H polling district, and the rest of the proposed Bradford South constituency with which it would be grouped. We received a counter proposal which suggested an alternative ward be split between the Bradford East and Bradford South constituencies, with all of the Little Horton ward remaining in the former. The respondent suggested that the Bowling and Barkerend ward, currently within the existing Bradford East constituency, be split, with the single polling district of 5F, covering part of the community of Tyersal, transferred to the proposed Bradford South constituency, and the remaining seven polling districts, covering the areas of Barkerend and East Bowling, remaining in Bradford East. It was contended that this arrangement would be superior to the revised proposals as it would: avoid the division of the community of Marshfields between constituencies; unite the community of Tyersal in one constituency; and respect the major A6177 ring road (Smiddles Lane) as a constituency boundary better than either the existing arrangement or our revised proposals would. This counter proposal was supported by a number of other respondents.

1486. Although the transfer of the 18H polling district of the Little Horton ward to the proposed Bradford South constituency in the revised proposals was overwhelmingly opposed, we did receive some representations in support of the proposal. These representations suggested the revised proposals were superior to the initial proposals in terms of retaining community ties and protecting community cohesion, and minimising the number of electors moved between constituencies.

1487. Elsewhere in the City of Bradford, the revised proposals resulted in no other significant issues. A handful of respondents contended that the towns of Keighley and Ilkley should be in separate constituencies, while a smaller number opposed the addition of Ilkley to the constituency name. Both the proposed Bradford West and Shipley constituencies resulted in very few representations.

1488. The revised proposals arrangement across the Borough of Kirklees was considerably less contentious than in the initial proposals, resulting in few representations and no single significant issue by number of representations. Respondents suggested the arrangement in the north of the local authority, across the proposed constituencies of Dewsbury and Batley, and Spen Valley, was an improvement on the initial proposals. In the latter, the remaining opposition tended to be

with regard to the Mirfield ward or the part of the Dalton ward proposed to be included within it. A small number of respondents from these areas contended that they look to Dewsbury or Huddersfield, and are not a part of the Spen Valley. We received a counter proposal which would transfer these areas, plus part of the Liversedge and Gomersal ward to a constituency with the town of Dewsbury, while the town of Batley would be removed and returned to a constituency with the Spen Valley communities.

1489. The revised Wakefield West and Denby Dale constituency resulted in more opposition than the other proposed constituencies wholly or partially in the Borough of Kirklees. The proposed composition received a mixed response, for similar reasons as its predecessor in the initial proposals (Ossett and Denby Dale). The revised constituency name was opposed by respondents both in favour and opposition of its composition. Some pointed out that the ward of Wakefield West is not included in the proposed constituency, which could lead to confusion. The most popular alternative, by number of representations, was a return to Ossett and Denby Dale.
1490. We received one counter proposal which suggested a slight amendment to the revised proposals arrangement for the Kirklees borough constituencies discussed above. The respondent suggested that the Flockton area of the Kirkburton ward (polling district KB04) be transferred to the proposed Wakefield West and Denby Dale constituency, with the Howden Clough part of the Birstall and Birkenshaw ward (polling district BB03) being transferred from the proposed Spen Valley constituency to Dewsbury and Batley, in exchange. They contended that there are few ties between Flockton and either Dewsbury or Batley, while there are close links between the area of Howden Clough and Batley.
1491. The proposed Colne Valley and Huddersfield constituencies, which were unchanged from the initial proposals, resulted in very few representations in the revised proposals consultation.
1492. The revised arrangement within the Borough of Calderdale was considerably more popular than the initial proposals. The proposed Calder Valley constituency was strongly supported, almost entirely due to the retention of the Hipperholme and Lightcliffe ward, which was transferred to a cross-local authority boundary constituency with the town of Batley in the initial proposals. The proposed Halifax constituency garnered very few representations, with only two opposing the proposed split of the Ryburn ward. These representations contended that this would divide the village of Triangle between constituencies.
1493. The two proposed constituencies wholly within the City of Wakefield were mostly opposed during the consultation on the revised proposals. Respondents opposed the separation of the towns of Altofts and Normanton into separate constituencies, with the latter linked with Hemsworth and other areas in the south of the local authority, with which it was suggested it has few ties. We received one counter proposal which sought to retain Altofts and Normanton in the same constituency, along with the town of Castleford, while the towns of Hemsworth and Pontefract would be combined in a second constituency.
1494. The composition of the proposed Pontefract and Castleford constituency garnered few representations, however, there were a number of requests for the town of Knottingley to be acknowledged in the constituency name. Respondents contended that the constituency contains three distinct towns which should all be acknowledged, and there is precedent for a three-place

name constituency in the area due to the existing constituency name of Normanton, Pontefract and Castleford.

1495. The inclusion of the City of Leeds ward of Rothwell in the Wakefield constituency continued to be opposed, although in fewer numbers than at previous stages of consultation. A small number of representations contended that Rothwell should be included in the constituency name to acknowledge its cross-local authority boundary nature.
1496. The revised proposals for the constituencies wholly within the City of Leeds received a mixture of support and opposition during the consultation period. The proposed split of the Temple Newsam ward between the proposed Leeds Central and Leeds East constituencies was very strongly opposed. Respondents contended that the revised proposals would sever ties between the Halton area and the rest of the Temple Newsam ward, as well as the wider Leeds East constituency, while transferring it to a Leeds Central constituency with which it has few ties. Representations also stated that the ward split was arbitrary and divided residential areas, particularly around the Templegate estate. In contrast, the revised Leeds East constituency was mostly supported for retaining all of the Gipton & Harehills ward within it. Many respondents stated that, although the Leeds East composition is still not ideal, it is a vast improvement on the initial proposals.
1497. We received a counter proposal which, rather than splitting the Temple Newsam ward, proposed an alternative split (to our initial proposals) of the Gipton & Harehills ward between the Leeds Central and Leeds East constituencies. It proposed the ward be split using a different grouping of polling districts to that in the initial proposals: four polling districts in the east of the ward would remain in the proposed Leeds East constituency (GHA, GHB, GHD and GHI), while the remaining seven polling districts would be transferred to the proposed Leeds Central constituency. Those in support of this counter proposal contended that the resulting split of the ward was more logical than both the initially proposed split of the Gipton & Harehills ward, and the split of the Temple Newsam ward in the revised proposals. In particular, they suggested that Oak Tree Drive, which would form part of the constituency boundary in the counter proposal, is a distinct and well-known boundary between north and south Gipton. One representation went on to assert that the counter proposal is superior to the revised proposal arrangement due to the close ties between Harehills and the Leeds Central ward of Burmantofts & Richmond Hill, and matches more closely how the wards are grouped into inner and outer areas by both the City of Leeds local authority and West Yorkshire Police.
1498. Elsewhere in the City of Leeds, the revised compositions of the proposed Morley and Pudsey constituencies were mostly opposed, although not in substantial numbers. The inclusion of the Farnley & Wortley ward in the proposed Morley constituency was opposed by respondents who stated they have very few links with the town of Morley, and should instead remain in a constituency with the ward of Armley to their north. Similar arguments were made by respondents in the Armley ward regarding their inclusion in a constituency with the town of Pudsey, although in fewer numbers.
1499. Few representations were received in the revised proposals consultation regarding the composition of the proposed constituencies of Headingley, Leeds North East, and Leeds North West – with the latter being mostly supported.

1500. Two counter proposals were received which suggested substantial change to the revised proposals arrangement across the City of Leeds. This included one which would result in Leeds North West, Leeds West, and Pudsey constituencies similar to the existing, but with an additional ward split between Leeds West and Pudsey. The Morley constituency would be the same as in the initial proposals, through the inclusion of the Middleton Park ward.
1501. Many representations were received regarding the proposed naming of one or more of the proposed constituencies in the City of Leeds. The greatest matter regarding a constituency name, by number of representations, was for the proposed Pudsey constituency to be renamed Leeds West and Pudsey. Respondents contended that the existing name would not be representative of the newly included wards of Armley, and Bramley & Stanningley which have closer ties to the city centre. Similar arguments were received regarding the existing name of Morley not being representative of all of the revised constituency, although in fewer numbers than those received regarding the proposed Pudsey constituency. There was also no single most popular alternative name suggestion for the Morley constituency, by number of representations.
1502. Some representations were received regarding the proposed names of the Headingley and Leeds Central constituencies due to the latter no longer containing much of the city centre of Leeds, following the transfer of the Little London & Woodhouse ward between these constituencies in the revised proposals. Respondents contended that the proposed Headingley constituency should acknowledge Leeds in the name, with Leeds North West being the most popular alternative name by number of representations. Such a change would need to be accompanied by a name change to the proposed Leeds North West constituency, which is discussed below. Meanwhile, the most popular alternative name by number of representations for the proposed Leeds Central constituency was Leeds South. Respondents contended that, not only did the proposed constituency no longer contain most of the city centre, many of the suburbs contained within it identified as 'south Leeds'.
1503. In contrast to the proposed Headingley constituency, respondents contended that it would be anomalous for the Leeds North West constituency to have a Leeds suffix. Most respondents suggested an alternative name that included one or more of the major towns within the constituency (Guiseley, Horsforth, Otley, and Yeadon), but no single name was most popular within the representations. Some alternatives received included Horsforth and Wharfedale, Horsforth and Otley, Guiseley and Otley, and Aireborough and Wharfedale.

### **Final recommendations**

1504. Having considered the evidence received regarding the revised proposals across West Yorkshire, we recommend a slight amendment to two constituencies, and a name change to a further seven.
1505. In the City of Bradford, we acknowledge the strong opposition to the transfer of polling district 18H of the Little Horton ward, containing part of the Marshfields community, to the proposed Bradford South constituency. We note the representations and petition contending that this community has little in common with the rest of the constituency in which it would be included and consider that the counter proposal, which would instead transfer the 5F polling district of the Bowling and Barkerend ward, may be superior. We decided to visit the area to compare the different options 'on the ground'.

1506. We observed that the 18H polling district of the Little Horton ward is isolated from the Wibsey ward of the existing Bradford South constituency by the A6177 road (Smiddles Lane), which we considered to be a fairly busy and substantial road. We then observed the boundary between the Bowling and Barkerend, and Tong wards (of the existing Bradford East and Bradford South constituencies, respectively). Here, we considered the boundary between the two wards (Dick Lane) to be less substantial, and it appeared that the community of Tyersal was spread across both sides of the boundary. Finally, we observed the boundary of the proposed ward split. We noted the split passes through mostly industrial areas, which make up the majority of the 5F polling district. The large majority of the housing is east of the A6177 road, somewhat separated from the rest of the Bowling and Barkerend ward by industrial land. We considered that this likely supports the suggestion that the part of Tyersal that lies within the 5F polling district has links with the community on the other side of Dick Lane, in the Tong ward.
1507. Considering our observations and the evidence received during consultation, we are persuaded of the limitations of our revised proposals for the Bradford East and Bradford South constituencies. We consider that the counter proposal to instead transfer polling district 5F of the Bowling and Barkerend ward to the proposed Bradford South constituency, while retaining all of the Little Horton ward in Bradford East, better reflects the statutory factors. Therefore, we propose this arrangement for the constituencies of Bradford East and Bradford South in our final recommendations.
1508. Elsewhere in the City of Bradford, we make no further changes to the revised proposals in our final recommendations. We acknowledge a small amount of opposition to the grouping of the towns of Keighley and Ilkley in the same constituency. However, we note that the composition of this constituency has only been amended from the existing arrangement to align with new local government ward boundaries, and it was mostly supported across previous consultation stages. We also note that the opposition to the addition of Ilkley to the constituency name was greatly outweighed by representations in favour of such a change received in the initial proposals consultation stage. We note very few representations received regarding the proposed Bradford West or Shipley constituencies.
1509. In the Borough of Calderdale we note the almost universal support for the revised proposals, and therefore retain the proposed Calder Valley and Halifax constituencies unchanged in our final recommendations.
1510. We also acknowledge that the revised proposals arrangement for the Borough of Kirklees is more popular than the initial proposals were. We note some minor opposition to elements of the proposed Dewsbury and Batley, and Spen Valley constituencies, as well as a mixed response to the composition of the proposed Wakefield West and Denby Dale constituency, as voiced at previous consultation stages. Despite this, we are not persuaded to change the composition of the revised proposals in this area. We do not consider that the counter proposals received, which would involve more ward splits, better reflect the statutory factors overall than compared with the revised proposals. Therefore, we make no change to the proposed Dewsbury and Batley, and Spen Valley constituencies in our final recommendations, and no change to the composition of the proposed Wakefield West and Denby Dale constituency. However, we have been persuaded to change the name of the latter and adopt a return to the name Ossett and Denby Dale in the final recommendations. This acknowledges the largest settlement by population in the City of Wakefield part of the constituency, and was the most popular alternative, by number of



representations, across the consultation periods. We note very few representations regarding the proposed Colne Valley and Huddersfield constituencies, and retain them unchanged in our final recommendations.

1511. We acknowledge the continued opposition to the inclusion of the City of Leeds ward of Rothwell in the proposed Wakefield constituency, which has been contentious throughout the review process. However, we do not consider that we have received any compelling new evidence to persuade us to change the arrangement in the final recommendations. We are cognisant that to change the cross-local authority arrangement between the cities of Leeds and Wakefield would likely result in wide-scale change across the sub-region, which we consider would result in an inferior proposal overall, with respect to the statutory factors. This was the case regarding the counter proposal we received which involved an alternative cross-local authority boundary arrangement between Leeds and Wakefield, as well as an alternative arrangement between North Yorkshire and West Yorkshire. Therefore, we make no change to the composition of the proposed Wakefield constituency in the final recommendations. Despite this, we have been persuaded by respondents who argued it would be appropriate to include Rothwell in the constituency name, and therefore adopt the name of Wakefield and Rothwell in the final recommendations. We consider that this appropriately acknowledges the cross-local authority element of the proposed constituency.
1512. Elsewhere in the City of Wakefield, we note that the proposed Normanton and Hemsworth, and Pontefract and Castleford constituencies were mostly opposed. Despite this, we have not been persuaded to change the composition of these constituencies, and still consider that the revised proposals are the superior arrangement in the area. We consider that, although a counter proposal we received would retain the towns of Altofts and Normanton in the same constituency, the arrangement would likely break similarly strong community ties elsewhere in the local authority, and would also result in more extensive change from the existing arrangement. Despite making no change to the composition of the proposed Normanton and Hemsworth, and Pontefract and Castleford constituencies, we have been persuaded by the evidence regarding the acknowledgement of the town of Knottingley in the name of the latter. Therefore we adopt the name Pontefract, Castleford and Knottingley in our final recommendations.
1513. In the City of Leeds, we acknowledged the strong opposition to the proposed split of the Temple Newsam ward between the Leeds Central and Leeds East constituencies. We also noted the counter proposal received which would involve splitting the Gipton & Harehills ward instead, following a more distinct boundary than that used in the initial proposals, according to respondents. We decided to visit the area to observe the boundaries of the proposed ward splits and to consider the various arguments made by respondents in regard to both options.
1514. Having visited both the Gipton & Harehills and Temple Newsam wards, we recognised the limitations involved in splitting either in our final recommendations. We noted that both would likely break community ties, and considered it to be a very finely balanced decision. Having considered all the representations received during all consultations, and our observations from visiting the area, we are persuaded by the evidence received regarding the community ties within the Gipton & Harehills ward, and between Harehills and the wider east Leeds community. We concluded that the revised proposals involving the split of the Temple Newsam ward would result in a pattern of constituencies that better reflected the statutory factors overall. Therefore,

we have decided to make no change to the composition of the Leeds Central and Leeds East constituencies in our final recommendations.

1515. Elsewhere in the City of Leeds, we acknowledge some opposition to the proposed Morley and Pudsey constituencies, but note the arrangement is less contentious than in the initial proposals. We appreciate the merit of elements of the counter proposal which would return the west of the City of Leeds authority to an arrangement similar to the existing. However, we consider that this arrangement would reintroduce some of the issues identified in the initial proposals, as well as some limitations of the existing arrangement, such as the division of the community of Yeadon between constituencies. We also consider that the additional split of the Calverley & Farsley ward would likely break community ties. Therefore, on balance, we consider the revised proposals to be the superior arrangement for the constituencies of Morley and Pudsey, and make no changes to their composition in the final recommendations.
1516. We note few representations regarding the proposed composition of the Headingley, Leeds North East, or Leeds North West constituencies, and therefore retain the arrangement of these constituencies in the final recommendations.
1517. Despite making no change to the composition of the revised proposals in the City of Leeds, we acknowledge the opposition regarding many of the proposed constituency names. We were sympathetic to many of the arguments for alternative names, but noted that there was little consensus on what constituency names best reflected the configuration of constituencies. However, we recognised that, in many cases, representations considered that reflecting Leeds in the constituency name was important. We therefore reflected on our proposed constituency names. We have decided to make no changes to the proposed Leeds East, Leeds North East, and Leeds North West constituency names. We adopt the name Leeds Central and Headingley for the Headingley constituency of the revised proposals, to acknowledge that it contains most of the city centre, within the Little London & Woodhouse ward. In turn, we adopt the name Leeds South for the Leeds Central constituency of the revised proposals, to reflect that most of this constituency lies to the south of the centre of the City of Leeds. Finally, we change the names of the proposed Morley and Pudsey constituencies to Leeds South West and Morley, and Leeds West and Pudsey, respectively. We consider that these constituency names acknowledge the areas of these constituencies which likely identify more closely with the city centre of Leeds itself, while still recognising the historically independent towns which feature in the existing constituency names.
1518. Therefore, our final recommendations in West Yorkshire are for constituencies of: Bradford East; Bradford South; Bradford West; Calder Valley; Colne Valley; Dewsbury and Batley; Halifax; Huddersfield; Keighley and Ilkley; Leeds Central and Headingley; Leeds East; Leeds North East; Leeds North West; Leeds South; Leeds South West and Morley; Leeds West and Pudsey; Normanton and Hemsworth; Ossett and Denby Dale; Pontefract, Castleford and Knottingley; Shipley; Spen Valley; and Wakefield and Rothwell. The areas contained by these constituencies are listed in Volume two and shown on the maps in Volume three of this report.



# Appendix A

## Membership of the Boundary Commission for England

### Chair (ex officio)

The Speaker of the House of Commons (Rt Hon. Sir Lindsay Hoyle, MP)

### Deputy Chair

The Hon. Mr Justice Lane

### Commissioners

Colin Byrne

Sarah Hamilton

### Assistant Commissioners

Region	Assistant Commissioners
East Midlands	Peter Fish CB (Lead), Alison Blom-Cooper
Eastern	Jane Kilgannon (Lead), David Brown QFSM
London	John Feavoyour QPM (Lead), Parjinder Basra
North East	Tim Foy OBE (Lead), Simon Barnes
North West	Andy Brennan QPM (Lead), David Brown QFSM
South East	Howard Simmons (Lead), Simon Tinkler
South West	Anita Bickerdike (Lead), John Feavoyour QPM
West Midlands	Sir David Natzler KCB (Lead), Ruth Bagley OBE
Yorkshire and the Humber	Professor Paul Wiles CB (Lead), Suzanne McCarthy

Biographical information for the Commissioners and Assistant Commissioners is available on the Commission's website.

### Secretary to the Commission

Tim Bowden

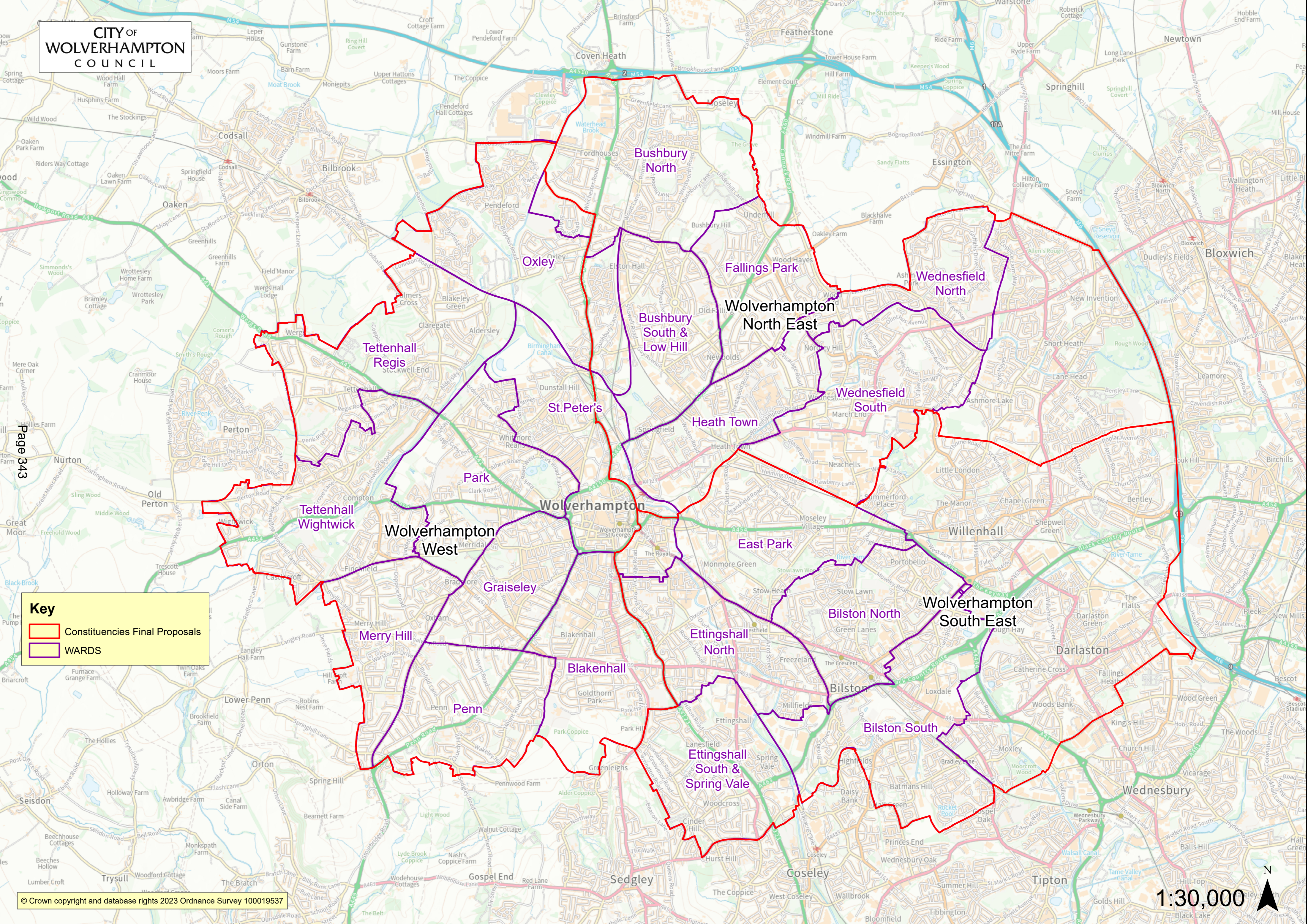


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**CITY OF  
WOLVERHAMPTON  
COUNCIL**

**Key**

- Constituencies Final Proposals
- WARDS



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<b>CITY OF WOLVERHAMPTON COUNCIL</b>	<b>Governance and Ethics Committee</b> 7 September 2023
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<b>Report title</b>	Conferring the Title of Honorary Alderman	
<b>Cabinet member with lead responsibility</b>	Councillor Ian Brookfield Leader of the Council	
<b>Accountable director</b>	David Pattison, Chief Operating Officer	
<b>Originating service</b>	Governance	
<b>Accountable employee</b>	Jaswinder Kaur	Democratic Services and Systems Manager
	Tel	01902 550320
	Email	Jaswinder.kaur@wolverhampton.gov.uk
<b>Report to be considered by</b>	Council	20 September 2023

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**Recommendation for decision:**

The Governance and Ethics Committee recommends that Council:

1. Convene an extraordinary meeting on the 20 September 2023 to confer the title of Honorary Alderman on former Councillors Philip Page and Jonathan Yardley.

## **1.0 Purpose**

- 1.1 To consider whether to confer the title of Honorary Alderman on former Councillors Philip Page and Jonathan Yardley who ceased to be a Members of the Council in May 2023.

## **2.0 Background**

- 2.1 In July 1998 the Council agreed to establish a policy for the appointment of Honorary Aldermen, for which there is provision in the Local Government Act 1972 (Section 249). Subsequently, in September 1998, the then Policy and Resources Committee endorsed a procedure for reporting to Council on this matter and determined the eligibility criteria. The service criterion was reduced from 24 years to 20 years by resolution of full Council on 14 July 2010.
- 2.2 Under the provisions of the Council's Constitution, the function of advising full Council on the conferment of the title of Honorary Alderman rests with the Governance and Ethics Committee, and therefore, the Committee is asked to consider this proposal.
- 2.3 Honorary Aldermen are invited to attend full Council meetings in a non-participating capacity and are also invited to various functions such as Civic and Remembrance Sunday and other appropriate civic events. The names of Honorary Aldermen are inscribed on a roll of honour board on the ground floor of the Civic Centre.
- 2.4 The Local Government Act 1972 Act provides that an extraordinary Council meeting be convened for the purpose of conferring the title and the necessary resolution must be passed by not less than two thirds of the Members voting. It is proposed that the extraordinary meeting be convened prior to the ordinary Council meeting on 20 September 2023.

## **3.0 Conferment of the title of Honorary Alderman**

- 3.1 Mr Page has a total of 20 years' distinguished service. During this time, he has not only served the residents of Bilston North Ward, but also held many important positions within the Council impacting on the lives of the citizens of our whole City. They are too numerous to mention, but in particular he was the Mayor of the City of Wolverhampton in 2018-2019 and the Cabinet Member for Schools, Skills and Learning. He Chaired Statutory Licensing Committee, Regulatory Committee, Health Scrutiny Panel and Human Resources Panel. He was Vice Chair of Human Resources Appeal Panel. He had also taken an active part on the other regulatory committees, scrutiny panels and reviews and advisory bodies he served on.
- 3.2 Mr Page's service meets the criterion for eligibility for conferment agreed by the Council. Following consultation with the political groups on the Council it is proposed that the title of Honorary Alderman is bestowed on him.
- 3.3 Mr Yardley has a total of 20 years' distinguished service. During this time, he has not only served the residents of Tettenhall Regis Ward, but also held many important positions within the Council impacting on the lives of the citizens of our whole City. They

are too numerous to mention, but in particular he was Cabinet Member for Neighbourhoods and Community Safety and Chaired Planning Committee. He Chaired Planning Committee. He was Vice Chair of Planning Committee, Superannuation Committee, Enterprise and Business Scrutiny Panel, Stronger City Economy Scrutiny Panel and Audit and Risk Committee. He had also taken an active part on the other regulatory committees, scrutiny panels and reviews and advisory bodies he served on.

- 3.4 Mr Yardley's service meets the criterion for eligibility for conferment agreed by the Council. Following consultation with the political groups on the Council it is proposed that the title of Honorary Alderman is bestowed on him.

#### **4.0 Financial implications**

- 4.1 As was the case with previous Honorary Aldermen it is the intention to present the former Councillor with a badge of office. These will be drawn from an existing stock of badges purchased prior to this financial year. A small cost will be incurred in inscribing the name of the Honorary Alderman on the badge, and also on the roll of honour board, but this can easily be accommodated within existing Democratic Services budgets.  
[SR/19062023/B]

#### **5.0 Legal implications**

- 5.1 Section 249 of the Local Government Act 1972 enables a local authority to confer the title of Honorary Alderman on "persons who have, in the opinion of the Council, rendered eminent services to the Council as past Members of the Council but who are not then members of the Council".

- 5.2 [TC/12062023/B]

#### **6.0 Equalities implications**

- 6.1 There are no direct equalities implications arising from the recommendation of this report.

#### **7.0 All other Implications**

- 7.1 There are no other implications arising from the recommendation of this report.

#### **8.0 Schedule of background papers**

- 8.1 None

#### **9.0 Appendices**

- 9.1 None

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<b>CITY OF WOLVERHAMPTON COUNCIL</b>	<b>Governance and Ethics Committee</b> 7 September 2023
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<b>Report title</b>	2022 -2023 Annual Complaints Report	
<b>Cabinet member with lead responsibility</b>	Councillor Paula Brookfield Cabinet Member for Governance and Equalities	
<b>Accountable director</b>	David Pattison, Chief Operating Officer	
<b>Originating service</b>	Information Governance	
<b>Accountable employee</b>	Sarah Campbell	Customer Engagement Manager
	Tel	01902 551090
	Email	<a href="mailto:sarah.campbell@wolverhampton.gov.uk">sarah.campbell@wolverhampton.gov.uk</a>
<b>Report to be/has been considered by</b>	Leadership Team Meetings Finance, Governance, Regeneration, Joint Families (Adult, Children's & Education, Public Health), Resident Services, City Assets, People and Change	August 2023

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### Recommendations for noting:

The Governance and Ethics Committee is asked to note:

1. The contents of the 2022 – 2023 Annual Complaints Report for the period 1 April 2022 to 31 March 2023, including:
  - a. The Statutory Complaints Activity for Children's Services, Education Services, Adult Services and Public Health
  - b. All the other complaints activity governed by the Corporate Complaints Policy

## **1.0 Purpose**

1.1 This report provides an overview of the complaints, including Local Government and Social Care/Housing Ombudsman enquiries received during 1 April 2022 to 31 March 2023.

## **2.0 Background**

2.1 The council's Complaints Team handles complaints, compliments and service enquiries from members of the public. Those relating to children's, adults and public health matters fall under a statutory framework, while the remainder are handled under the council's corporate complaints policy

## **3.0 Summary Statement**

3.1 The complaints team has continued to work effectively and build strong relationships with council services and Leadership Teams ensuring they meet the corporate and statutory functions and deadlines.

3.2 The council will continue to maintain a professional relationship in their role as the link officer with the Local Government and Social Care Ombudsman (LGSCO) and Housing Ombudsman (HO); this will ensure that the process works effectively for both the council and the Ombudsman whilst resolving complaints quickly and improving public services through learning from complaints.

## **4.0 Financial implications**

4.1 There are no financial implications associated with the recommendation in this report. [SR/02082023/A].

## **5.0 Legal implications**

5.1 The statutory complaints procedure must comply with various statutes. These include:

- Children and Family Services - The Children Act 1989, Representations
- Procedure (England) Regulations 2006. The Local Authority functions covered include services provided under Parts III, IV and V of the Children Act 1989
- Adult Social Care – The Local Authority Social Services and National Health Service Complaints (England) Regulations 2009; which came into force on 1 April 2009.
- Public Health - The NHS Bodies and Local Authorities (Partnership Arrangements, Care Trusts, Public Health and Local Healthwatch) Regulations 2012.

Legal Code: [TC/04082023/A].

## **6.0 Equalities implications**

6.1 No equalities implications have been identified, either through actions or recommendations of this report or from the data presented within it.

## **7.0 All Other Implications**

7.1 The complaints element of the social care and corporate procedure is part of a wider assurance process supporting quality in service delivery standards. This can then be a positive experience for people and contribute to their health and well-being. For those occasions where the experience which has led to a complaint is a less positive one, then there is an opportunity for appropriate action or redress so that the health and well-being of the complainant and/or relevant others is secured. The compliments process allows customers to note great practice by the Council; positive experience of officers working in many different settings will support improved experience of health and well-being for individuals as well as for staff who can be satisfied that their work is appreciated.

7.2 A number of complaint cases were implicated by Covid-19 Pandemic and are outlined in this report.

## **8.0 Human Resources**

8.0 There are no human resource implications identified. As part of their operational management duties, Managers will continue to monitor and encourage take up of the complaint training and take necessary action accordingly.

## **9.0 Schedule of Background Papers**

9.1 None for consideration.

## **10.0 Appendices**

10.1 Appended to this covering report are the following documents:

10.2 Appendix 1 – 2022 - 2023 Annual Complaints Report

Appendix 2 – Complaint Dashboard and Learning

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# City of Wolverhampton Council

## 2022 - 2023 Annual Complaints Report



## Index

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Housing Ombudsman Annual Performance Report 2022-23

Learning from Complaints

Complaint Training

Managing Unreasonable Customer Behaviour Procedure

Complaints Policies and Procedures

## LGSCO and HO Link Officer Assurance Statement

The council will continue to maintain a professional relationship in their role as the link officer with the Local Government and Social Care Ombudsman (LGSCO) and Housing Ombudsman (HO); this will ensure that the process works effectively for both the council and the Ombudsman whilst resolving complaints quickly and improving public services through learning from complaints. The complaints team has continued to work effectively to build strong relationships with council services and Leadership Teams to maintain corporate and statutory functions and deadlines.

### Forward plan

The focus for 2023-2024 is to continue to achieve all corporate and statutory requirements and in doing so maintain the council's complaint standards and reputation. Complaint training will be monitored and reviewed on a regular basis and promoted across the council to ensure officer awareness of complaint handling and processes. The council's complaint procedures and complaint information resources will be developed and reviewed under a new complaint policy framework ensuring they are fit for purpose and meet the corporate and statutory guidelines. A review will also be undertaken of complaints policies and processes across managing agents and the council to benchmark against the Housing Ombudsman Code of Practice to improve customer experience and to focus on transparency and using them to improve services. The service has secured a new complaint case management system which will be launched in September 2023; this will transform ways of working and improve productivity for the complaints function across the council.

### Introduction

This report provides an overview of the council's handling of complaints, compliments and service requests/informal complaints from members of the public, including Local Government and Social Care (LGSCO)/Housing Ombudsman (HO) enquiries received during 1 April 2022 to 31 March 2023.

Those relating to children's, adults and public health matters fall under a statutory framework, while the remainder are handled under the council's corporate complaints policy and procedure. This report provides an update of the council's performance and an overview of what is going well and where improvements can be made.

The Annual Report provides an update on;

- Statutory complaints activity for Children's Services, Education Services, Adult Services and Public Health
- Complaints activity governed by the Corporate Complaints Policy and Procedure
- Local Government and Social Care Ombudsman (LGSCO) and Housing Ombudsman (HO) cases
- Complaint training for council officers via the council's learning hub
- Learning from complaints to improve performance across council services
- Managing unreasonable customer behaviour procedure
- Review of complaint policies and procedure and information

The council has an accessible central complaint function which addresses all corporate and social care statutory requirements, whilst maintaining the council's standards and reputation. The council continues to be committed to effective complaint handling, whilst adopting best practice in line with the Local Government and Social Care Ombudsman guidelines and ensuring good practice is embedded into the council's functions.

## Statutory and Regulatory Complaints

The council is required by statute to provide or undertake certain functions in line with the following statutory complaints procedure which must comply with the following. These include:

- Children and Family Services - The Children Act 1989, Representations
- Procedure (England) Regulations 2006. The Local Authority functions covered include services provided under Parts III, IV and V of the Children Act 1989
- Adult Social Care – The Local Authority Social Services and National Health Service Complaints (England) Regulations 2009; which came into force on 1 April 2009.
- Public Health - The NHS Bodies and Local Authorities (Partnership Arrangements, Care Trusts, Public Health and Local Healthwatch) Regulations 2012.

The remainder of complaints are handled under the council's corporate complaints policy and procedure.

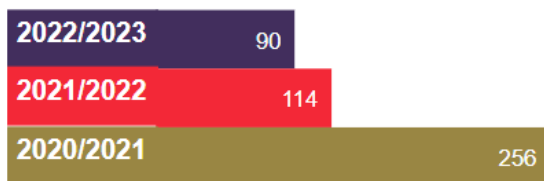
## Trends – three year period analysis

Total number of enquiries received by the Complaints Team – 2022 to 2023

<b>Complaint</b>	<b>Number received</b>
Service Requests/ Informal	1442
Stage 1s	156
Stage 2	20
Stage 3	0
HO	42
LGSCO	37
Compliments	694
<b>Total number of enquiries</b>	<b>2391</b>

## Corporate stage one and two comparisons

### Corporate stage one



Difference to 2021/2022: -24

In comparison to 2021/2022 a decrease has been seen in the number of stage 1 complaints received

### Corporate stage two



Difference to 2021/2022: -4

In comparison to 2021/2022 a decrease has been seen in the number of stage 2 complaints received.

## Children's stage one and two comparisons

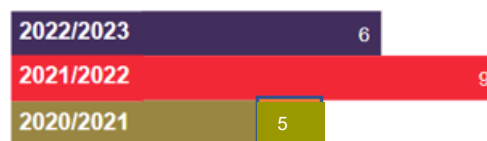
### Children's stage one



Difference to 2021/2022: 1

In comparison to 2021/2022 an increase has been seen in the number of stage 1 complaints received

### Children's stage two



Difference to 2021/2022: -3

In comparison to 2021/2022 a decrease has been seen in the number of stage 2 complaints received.

## Adults stage one and two comparisons

### Adult stage one



Difference to 2021/2022: -9

In comparison to 2021/2022 a decrease has been seen in the number of stage 1 complaints received

### Adult stage two



Difference to 2021/2022: -1

In comparison to 2021/2022 a decrease has been seen in the number of stage 2 complaints received.

## Local Government and Social Care Ombudsman (LGSCO)

### LGSCO Enquiries



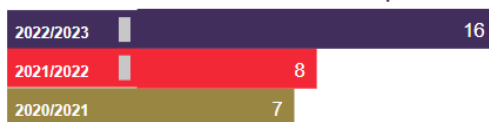
Difference to 2021/2022: 0

In comparison to 2021/2022 no change has been seen in the number of LGSCO enquiries.

Customer Feedback team has also received 27 initial LGSCO enquiries for 2022/2023.

## Housing Ombudsman (HO)

### HO Enquiries



Difference to 2021/2022: 8

In comparison to 2021/2022 an increase has been seen in the number of HO enquiries.

## Children's and Education Complaints Activity

### Informal Complaints

The complaint regulations provide an opportunity for young people/children, parents, advocates and carers to raise issues of concern without those matters being treated as formal complaints, as long as they are effectively addressed and resolved in a timely manner. These are referred to as informal complaints.

91 informal complaints were received during 1 April 2022 to 31 March 2023 compared to 75 informal complaints received during 1 April 2021 to 31 March 2022; an increase of 16 cases.

### Stage one complaints

The council received 41 stage one Children's and Education Services complaints compared to 40 during 1 April 2021 to 31 March 2022, an increase of one case. The 41 complaints received during this period refer to 14 separate service areas. The highest figure of 11 cases referred to the SEND Team. In some cases, this has followed extensive but unsuccessful attempts to resolve some of those complaints informally.

In accordance with Ombudsman's reporting good practice, the following customer groups submitted complaints to the council; (31) parents, (6) advocate, (2) headteacher/professional, (1) relative and (1) foster carer. Out of the 41 complaints logged and investigated 33 were submitted via email, six via webform and two via letters. Six stage one complaints were received via an advocacy service. Out of the 41 complaints logged and investigated during this period, six cases were upheld (at fault), 21 cases were partially upheld (partially at fault) and 14 cases not upheld (not at fault). The six cases upheld were for the following service

areas; Strengthening Families (2); Children and Young People in Care (DYPiC) (2); Adoption@heart (1); Education, SEND (1).

## Timescales

Out of the 41 complaints logged and investigated during this period, 12 complaints were dealt with in accordance with the Children's Act with a response timescale of 10 working days; the average timescale for statutory complaint responses was 14 days. 29 complaints were dealt with in accordance with the corporate complaints policy (Non-Children's Act) with a response timescale of 21 calendar days; the average timescale for corporate complaint responses was 22 days. The complaints team regularly reviews response times with Children's Services to improve timescales and complainants are regularly updated on the progress of their complaint, whilst providing realistic timescales.

## Stage two complaints

The council received six Children's stage two complaint cases. The council received four statutory stage two complaints in accordance with our statutory children's procedure; this is in comparison to no statutory complaint cases received during 1 April 2021 to 31 March 2022. The council received two corporate stage two complaint in accordance with our corporate complaints policy; this is in comparison to nine corporate cases received during 1 April 2021 to 31 March 2022. Out of the six cases received, five cases were partially upheld and one case upheld.

Stage two complaints are as follows:

- SEND Team received one complaint in relation to delays with EHCP and lack of information and support received from social care; outcome partially upheld; appropriate remedies and recommendations have been carried out
- SEND Team received one complaint in relation to delays with accessing education setting as outlined in EHCP; outcome partially upheld; appropriate remedies and recommendations have been carried out
- Children and Young People in Care received one complaint in relation to delays with processing a request for an extra bedroom at a foster carers; outcome partially upheld; appropriate remedies and recommendations have been carried out
- Children and Young People in Care not acting in the young person's best interest; outcome partially upheld; appropriate remedy and recommendations have been carried out
- Children and Young People in Care received one complaint in relation to consent for a hospital operation; outcome upheld; appropriate remedy and recommendations have been carried out
- Strengthening Families received one complaint in relation to insufficient service received by Children's Services and therefore young person's needs not met; outcome partially upheld; appropriate remedies and recommendations have been carried out

## Stage three complaints

Where a statutory children's stage two complaint investigation has been carried out and the complainant remains dissatisfied, they have the right to request matters proceed to the final stage of the statutory complaints procedure; a stage three Independent Complaint Review Panel. During 1 April 2022 to 31 March 2023 no complaints escalated to a stage three panel during this period; this is the same as the previous year, whereby no cases escalated to stage three.

## Complaint Category

These are the headings under which we register the complaint against, based on the complaint details received – see attached Dashboards.

## Compliments

All compliments are recorded by the complaints team and reported as part of the team's monitoring process. 90 compliments were received for Children's Services; Children and Young People in Care Team received the highest of 23.

## Public Health – Complaint Activity

Regionally and nationally councils receive very few complaints in relation to Public Health Services. A typical complaint would be where a council has commissioned a service for local people through a Clinic or GP practice. Complaints in relation to GP's and Hospitals are dealt with through a separate complaint process managed by Health Services.

### Informal complaints

Four informal complaints were received during 1 April 2022 to 31 March 2023; this is in comparison to one case received for 1 April 2021 to 31 March 2022.

### Stage one complaints

In relation to Public Health complaints, there has been one complaint received during 1 April 2022 to 31 March 2023; outcome partially upheld; appropriate remedies and learning have been carried out. This is in comparison to no complaints received during 1 April 2021 to 31 March 2022.

## Adult Services – Complaint Activity

### Informal complaints

The complaint regulations provide an opportunity for adult complaints to be resolved informally utilising a number of resolution methods as long as they are effectively addressed and resolved in a timely manner.

During 1 April 2022 to 31 March 2023 the council received 72 informal complaints which were resolved at service level without going through the formal route. This was compared to 53 informal complaints received during 1 April 2021 to 31 March 2022, an increase of 19 cases.

### Stage one complaints

The council received 25 formal complaints compared to 34 during 1 April 2021 to 31 March 2022, representing a decrease of nine cases during this period. The 25 complaints received covered 17 separate service areas. 20 complaints were received via email, two via telephone, two via webform and one via letter. In some cases, this has followed extensive but unsuccessful attempts to resolve some of those complaints informally. During this period, ten complaints received were in relation to commissioned services. Out of the 25 cases logged and investigated during this period, 11 were upheld, nine cases partially upheld and



nine cases not upheld. The seven cases upheld were for the following service areas; Commissioned Services (5), West Locality Team (1) and East Locality Team (1). Out of the 25 complaints cases received, 24 cases were investigated under our statutory procedure and one case was investigated under our corporate complaints policy.

## Complaint category

These are the headings under which we register the complaint against, based on the complaint details received – see attached Dashboards.

## Timescales

Out of the 25 complaints logged and investigated during this period, 24 cases were dealt with in accordance with the Statutory Adults procedure with a response timescale of 10 working days; the average response time was 16 days. One case was investigated under our corporate complaints policy with a response timescale of 21 calendar days; the average response time was 54 days. Cases responded to outside of the organisational timescales are due to various reasons for example, complex cases, availability of resources. In these circumstances, complainants are regularly updated on the progress of their complaint.

## Compliments

All compliments are recorded by the complaints team and reported as part of the team's monitoring process. 472 compliments were received for Adult Services; this figure also includes compliment feedback from an adult's customer satisfaction survey.

## Areas of Learning from Complaints

See attached Dashboard for learning.

## Corporate Complaints Activity

### Informal complaint enquiries/service requests

The complaints team works alongside the service involved and the customer complaining to resolve the complaint informally, preventing it becoming a formal complaint. 1,279 informal complaints and service request enquiries were logged with the complaints team in line with our corporate complaints policy during 1 April 2022 to 31 March 2023, compared to 1,229 received during 1 April 2021 to 30 March 2022. These types of enquiries are varied, for example, missed bin collection, contaminated bins, appeals, parking enquiries, litter or enquiries that fall outside of the corporate complaints policy jurisdiction. All enquiries were logged and resolved informally or sign posted to the correct process without going through the corporate complaints policy; this provides a swift outcome and resolution for the customer by resolving concerns at service level.

### Corporate stage one complaints

The council received 90 stage one corporate complaints compared to 114 received during 1 April 2021 to 31 March 2022; a decrease of 24 number of complaints received. Out of the 90 cases logged and investigated, 18 cases were upheld (at fault), 19 partially upheld (partly at fault) and 53 not upheld (not at fault). The 18 cases upheld were for the following service areas; Revenues and Benefits (11); Waste Management (2); Street Lighting (1); Facilities (1);

Customer Services (1) Registrars (1); Highways (1). The 90 complaints cover 20 separate service areas, the highest figure of 21 complaints refer to Revenues and Benefits followed by Waste Management, Licensing and Abor culture all receiving 11 cases. Out of the 90 stage one complaints received, 69 cases were submitted via email, 8 cases via webform, 8 cases via letter correspondence and 5 cases via telephone.

## Corporate complaint category

These are the headings under which we register the complaint against, based on the complaint details received – see attached dashboards.

## Corporate timescales

The average response time for responding to each complaint is 16 days for 1 April 2022 to 31 March 2023; this is in comparison to 17 days for 1 April 2021 to 31 March 2022. The response timescale for stage 1 complaints responding within 21 calendar days (corporate complaints policy) is 92%. Out of the 90 cases logged and investigated during this period, 83 cases were responded to within 21 calendar days and 7 cases responded to outside of this timescale. The target of 95% response time has therefore not been achieved; the complaints team will continue to monitor this response time and work with service groups to improve this timescale. Cases responded to outside of the timescale are due to various reasons for example, complex cases, availability of resources. In these circumstances, complainants are regularly updated on the progress of their complaint.

## Stage two corporate complaints

The council received 14 stage two corporate complaints compared to 18 cases for 1 April 2021 to 31 March 2022, a decrease of four cases in comparison to the previous year. Out of the 14 cases received, two cases were upheld (at fault) and six cases were partially upheld (partially at fault) and six cases not upheld (not at fault).

Stage two complaints received are as follows:

City Environment received nine cases as follows:

- Arboriculture Team received one case in relation to tree pruning not being carried out, overhanging branches and loss of light; outcome not upheld
- Arboriculture Team received one case in relation to overgrown trees affecting neighbours properties and wellbeing; outcome not upheld
- Environmental Health received one case in relation to conduct of compliance officer; outcome partially upheld; appropriate recommendations and remedies have been put in place
- Environmental Health received one case in relation to officer conduct and conflict of interest during site visit; outcome partially upheld; appropriate recommendations and remedies have been put in place
- Environmental Health received one case in relation to no response in relation to noise complaints; outcome upheld; appropriate recommendations and remedies have been put in place
- Waste Management received one case in relation to disabled access and rights and service at Household Waste Recycling Centre (RWRC); outcome not upheld
- Garden Waste/Highways/Environmental Health received one case in relation to various concerns for Garden Waste/Highways and Environmental services; outcome partially upheld; appropriate recommendations and remedies have been put in place

- Licensing received one case in relation to driver licensing application process and long delays; outcome not upheld
- Trading Standards/Licensing received one case in relation to service provided and charges applied for licensing transfer; outcome partially upheld, appropriate remedies and recommendations have been put in place

Finance received five cases as follows

- Insurance Services received one case in relation to handling of insurance claim regarding Wolverhampton Homes property for mould/damp claims; outcome partially upheld; appropriate recommendations and remedies have been put in place
- Revenues and Benefits received one case in relation to handling of housing benefits appeal by lead practitioner; outcome not upheld
- Revenues and Benefits received one case in relation to overcharging for council tax; outcome partially upheld; appropriate recommendations and remedies have been put in place
- Revenues and Benefits received one case in relation to council tax demand notices; outcome not upheld
- Revenues and Benefits received one case in relation to debt recovery and delays with responding; outcome upheld appropriate recommendations and remedies have been put in place

## Corporate compliments

All compliments are recorded by the complaints team and reported as part of the team's monitoring process. The council received 132 compliments; Planning Department received the highest number of 68.

## Area of learning for corporate complaints

See attached Dashboard for complaint learning.

## Local Government and Social Care Ombudsman Enquiries (LGSCO)

The council received ten Local Government and Social Care Ombudsman (LGSCO) enquiries as outlined below; out of the 10 cases received nine cases were upheld and one case not upheld.

Adult Services received three complaints as follows:

- Adult Services and Health Partnership and Commissioned Services received one enquiry in relation to care home failing to look after complainant and failed to return personal items; outcome not upheld, no maladministration
- Mental Health Service received one enquiry in relation to level of service and support received from assisted living; outcome, upheld, fault and injustice, appropriate recommendations and remedies have been put in place
- MASH/Safeguarding received one enquiry in relation to safeguarding enquiry at care home/care provider; outcome upheld, fault and injustice, appropriate recommendations and remedies have been put in place

Children's Services received three complaints as follows:

- Education Services, SEND Team received one enquiry in relation to failure to issue an amended Education Health and Care plan within the required time limit after an appeal to a SEND Tribunal; outcome upheld, fault and injustice; appropriate recommendations and remedies have been put in place
- Education Services, SEND Team received one enquiry in relation to delays with dealing with Education, Health and Care needs assessment and carer assessment application and issuing the final EHCP; outcome upheld, fault and injustice; appropriate recommendations and remedies have been put in place
- Base 25 received one complaint in relation to requests for information and how request was handled; outcome upheld, fault and injustice; appropriate recommendations and remedies have been put in place

City Environment received two complaints as follows:

- Licensing received one enquiry in relation to council's delays in dealing with private hire vehicle driver's licence; outcome upheld, no further action as council has already remedied complaint
- Environmental Services received one enquiry in relation to noise nuisance; outcome upheld, fault and injustice; appropriate recommendations and remedies have been put in place

Finance received one complaint as follows:

- Revenues and Benefits received one enquiry in relation to tenant's application for housing benefit; outcome upheld, fault and injustice; appropriate recommendations and remedies have been put in place

Wolverhampton Homes received one complaint as follows:

- Wolverhampton Homes/Housing Strategy received one enquiry in relation to faults in its handling of an application to its housing allocations scheme, how it determined priority banding on the scheme and how it has considered bids for properties; outcome, upheld, fault and injustice; appropriate recommendations and remedies have been put in place

## Local Government and Social Care Ombudsman (LGSCO) assessment enquiries

The council received 27 Local Government and Social Care Ombudsman initial assessment enquiries. Out of the 27 initial assessment enquiries received the outcomes were as follows; private matter (1); Closed after initial enquiries no further action (10); Closed after initial enquiries out of jurisdiction (7); Passed to investigation team for further consideration (4); premature complaint (4); awaiting outcome (1).

## Local Government and Social Care Ombudsman (LGSCO) annual letter

The Local Government and Social Care Ombudsman (LGSCO) publishes annual complaint statistics for each local authority. The LGSCO provided decisions on 44 complaints and enquiries during 2022/23 in relation to this council; this is in comparison to 41 during 2021/22. This process involves referring complaints back to the council for local resolution (7), incomplete/invalid (4), advice given (3), referred for initial enquiries (19), upheld (9) and not

upheld (2). Out of the 44 enquiries from the LGSCO, they carried out 11 detailed investigations of the complaints they received about the City of Wolverhampton Council for 2022/23; this is in comparison to 13 detailed investigations received for 2021/22. Out of the 11 detailed investigations carried out, the LGSCO has recorded 9 cases (82%) findings of fault (upheld) for the council during 2022/23 (this compares to an average of 77% in similar authorities). In 22% of the upheld cases (9 cases) the LGSCO found the council had provided a satisfactory remedy before the complaint reached the Ombudsman. This compares to an average of 10% in similar authorities. The annual report confirms that the council is 100% compliant with carrying out the LGSCO's upheld remedies and recommendations.

### Total number of full investigations for 2022/23

Service Area	Upheld	Not upheld	Total number of full investigations
Adult Care Services	2	1	3
Benefits and Tax	2	0	2
Corporate and Other	0	0	0
Education and Children's Services	4	0	4
Environmental, Public Protection and Reg	1	0	1
Highways and Transport	0	0	0
Housing	0	0	0
Planning and Development	0	1	1
Other	0	0	0
<b>Total</b>	<b>9</b>	<b>2</b>	<b>11</b>

The annual letter confirms that the LGSCO has reviewed and changed their investigation process and are more selective in the cases that they look at in detail; they are less likely to carry out investigations on borderline cases, therefore, they are finding a higher portion of fault overall across all complaints and average upheld rates have increased for 2022/23. City of Wolverhampton Council's upheld rate has increased by 20%, from 62% for 2021/22 to 82% for 2022/23. This is in line with neighbouring authorities.

City of Wolverhampton Council's performance for 2022/23 can be compared with neighbouring and other authorities via the LGSCO's interactive map; this interactive tool shows data and information, including annual performance data, about councils in one place. The map also provides links to published decision statements, public interest reports, annual letters and information about service improvements that have been agreed by each council. This interactive tool assists the council to monitor the service improvements they agree to make following the LGSCO's investigations. See link to interactive map as follows: [your council's performance interactive map](#). The LGSCO has confirmed that the numbers of cases which they report will not necessarily match the complaints data that we hold as statistics are recorded by the LGSCO in different annual year business periods. Not all cases are published due to confidentiality.

A joint complaint handling code will be undertaken with LGSCO and HO; this will provide a standard for authorities to work to. The LGSCO will consult on the code and its implications later in 2023.

## Housing Ombudsman (HO) Enquiries

The council received 16 enquiries from the Housing Ombudsman for Wolverhampton Homes as outlined below; out of the 16 enquiries received eight cases service failure/maladministration, two cases not at fault and six cases awaiting final report.

- One enquiry received in relation to landlords handling of the resident's concerns relating to invoice for major works, charges for replacement windows, consultation process, cost of drainage works, cost of boundary wall works, charges for daily maintenance of works, reports about asphalt and request for guarantee and warranties of works; outcome, awaiting report from the HO
- One enquiry received in relation to landlords handling of reports of a leaking sewage pipe and handling of follow on works; outcome service failure, appropriate recommendations and remedies have been put in place
- One enquiry in relation to the handling of the removal of rubble in the garden and response to reports of pests in the garden; outcome maladministration, appropriate recommendations and remedies have been put in place
- One enquiry in relation to the landlords handling of repairs to the internal door, response to the conduct of a staff operative, response to a gas safety check, handling of reports about not having window keys, along with concerns about safety, handling of reports of a leak affecting the property below, the level and method of communication and landlord's handling of reports of anti-social behaviour; outcome awaiting HO report
- One enquiry in relation to the landlord's handling of adaptations to the resident's home and handling of the resident's reports of delays and lack of communication; outcome awaiting HO report
- One enquiry in relation to the landlord's handling of repairs to the resident's bathroom and resident's request for rehousing; outcome service failure and maladministration; appropriate recommendations and remedies have been put in place
- One enquiry in relation to handling of works to disconnect communal facilities from the electricity supply and handling of repairs needed in the property, including works to address damp, mould, water ingress, and structural issues; outcome service failure and maladministration, appropriate recommendations and remedies have been put in place
- One enquiry in relation to landlord's handling of drainage issues at the property; outcome maladministration, appropriate recommendations and remedies have been put in place
- One enquiry in relation to resident's reports concerning damp and mould and the landlord's response to the resident's request for a permanent decant; outcome awaiting HO report
- One enquiry in relation to the resident's concerns related to the ownership of the footway crossing and dropped kerb at their property and whether they are liable for the cost of the dropped kerb and driveway they installed; concerns related to neighbours using the dropped kerb they paid for, including their reports that damage has been caused to the hardstanding and their request to be refunded for the installation of rear fencing at their property; outcome no maladministration
- One enquiry in relation to the landlord's handling of a request for the removal of its single point of contact arrangement; outcome service failure, appropriate recommendations and remedies have been put in place
- One enquiry in relation to response to the resident's reports of difficulties heating their home and handling of the resident's reports of draughts; outcome no maladministration
- One enquiry in relation to the landlord's response to reports that the garden slabs/posts are unsuitable, handling of repairs to the outbuildings, response to an overgrown tree, response to the report of leaks and response relating to issues with the property fencing; outcome awaiting HO report

- One enquiry in relation to the landlord's decision not to award the resident compensation for the damage to the kitchen flooring; awaiting the HO report
- One enquiry in relation to the landlord's handling of repairs to the kitchen due to its condition; outcome service failure; appropriate recommendations and remedies have been put in place
- One enquiry in relation to response to reports of repairs needed to the flooring and handling of the complaint; outcome maladministration and service failure, appropriate recommendations and remedies have been put in place

## Housing Ombudsman (HO) assessment enquiries

The council received 26 Housing Ombudsman assessment enquiries. Out of the 26 initial assessment enquiries received, 21 enquiries were premature complaints and 5 enquiries progressed to a full investigation.

## Housing Ombudsman (HO) annual performance report

The Housing Ombudsman publish an annual Performance Report; their draft report for 2022/23 has been received and the council are currently verifying the data. The published annual Performance Report will be available later in the year.

## Learning from Complaints

Where complaints highlight that things have gone wrong, heads of service, managers and the complaints team are required to identify these areas, implement remedies and review processes/procedures where necessary. Complaints team and Directorates are committed to learning and require the completion of a tracking form/learning log from each complaint investigated at stage one. When a complaint is upheld/partially upheld (council at fault) and the findings of a subsequent investigation is for a financial remedy, change to policy or service delivery at stage 2 and 3 of the complaints process or at Ombudsman stage, the complaints team produce an action plan report. Recommendations within these reports are agreed with appropriate Heads of Service and shared with the relevant Service Manager/Director to ensure appropriate remedies and changes to policy/service delivery are implemented and compliant with any Ombudsman's recommendations and remedies. The complaints team also attend regular meetings; Adults and Children's Services quality assurance meetings, Children's Services Head of Service/Deputy Director complaint meeting, SEND Complaints and Compliance meetings and Waste Liaison meetings to ensure they use the learning from complaints to drive service improvements and implement learning into their practice improvement plans/terms of reference. See attached dashboard for learning from complaints.

## Complaints Training

Corporate, Childrens and Adults complaint training for council officers is available via the council's learning hub. Complaint training will be monitored and reviewed on a regular basis and promoted across the council to ensure officer awareness of complaint handling and processes. 86 council officers have completed the training for this period across the three training modules and bespoke training to services is available upon request. Work will be undertaken with the Organisational Development Team to review the existing training package. This will ensure that training via the learning portal is monitored on a regular basis and training promoted and undertaken by the appropriate council officers. LGSCO external

training will also be attended by customer engagement officers to improve and enhance complaint handling.

## Managing Unreasonable Customer Behaviour Procedure

The management of unreasonable complainant behaviour procedure has been active since February 2015. During this period, the complaints team has managed a total of six cases in line with this procedure.

## Complaints Policies and Procedures

The council's complaints policies procedures are regularly reviewed to reflect current working practices and legislation. During this period the corporate complaints policy and procedure, adults complaints procedure and joint protocol complaint handling have been reviewed. During this review process, consultations and equality analysis have been carried out and policies presented to the relevant leadership teams and democratic panel/board for approval.



**Select a service:**

Adults | **Children's** | Corporate | Public Health

**Select a year:**

2021/2022 | **2022/2023** | 2023/2024

**Select a quarter:**

Q1 | Q2 | Q3 | Q4

**Stage 1 Complaints**

**41**

Stage 1 complaints received

**14**

Stage 1 complaints not upheld (council is not at fault)

**21**

Stage 1 complaints part upheld (council is partly at fault)

**6**

Stage 1 complaints upheld (council is at fault)

Corporate complaints procedure

**29**

Complaints received

**22**

Average response days (calendar days)

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Statutory complaints procedure

**12**

Complaints received

**14**

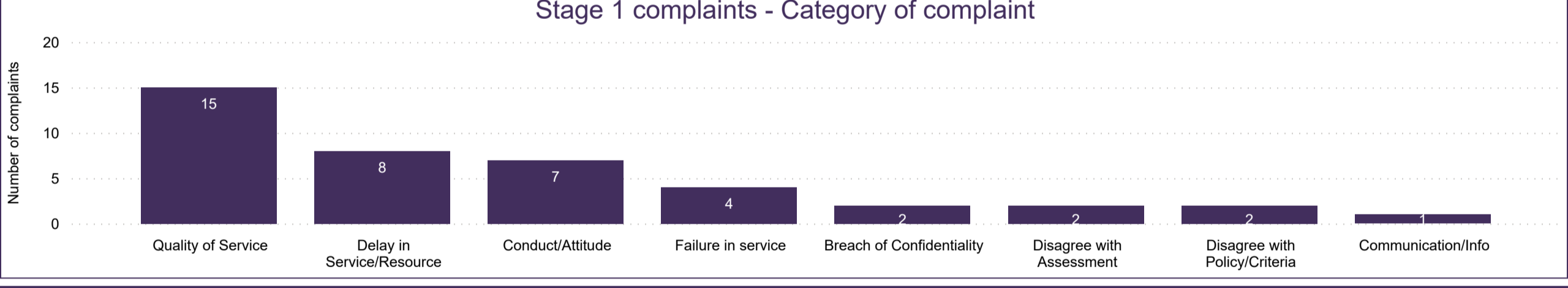
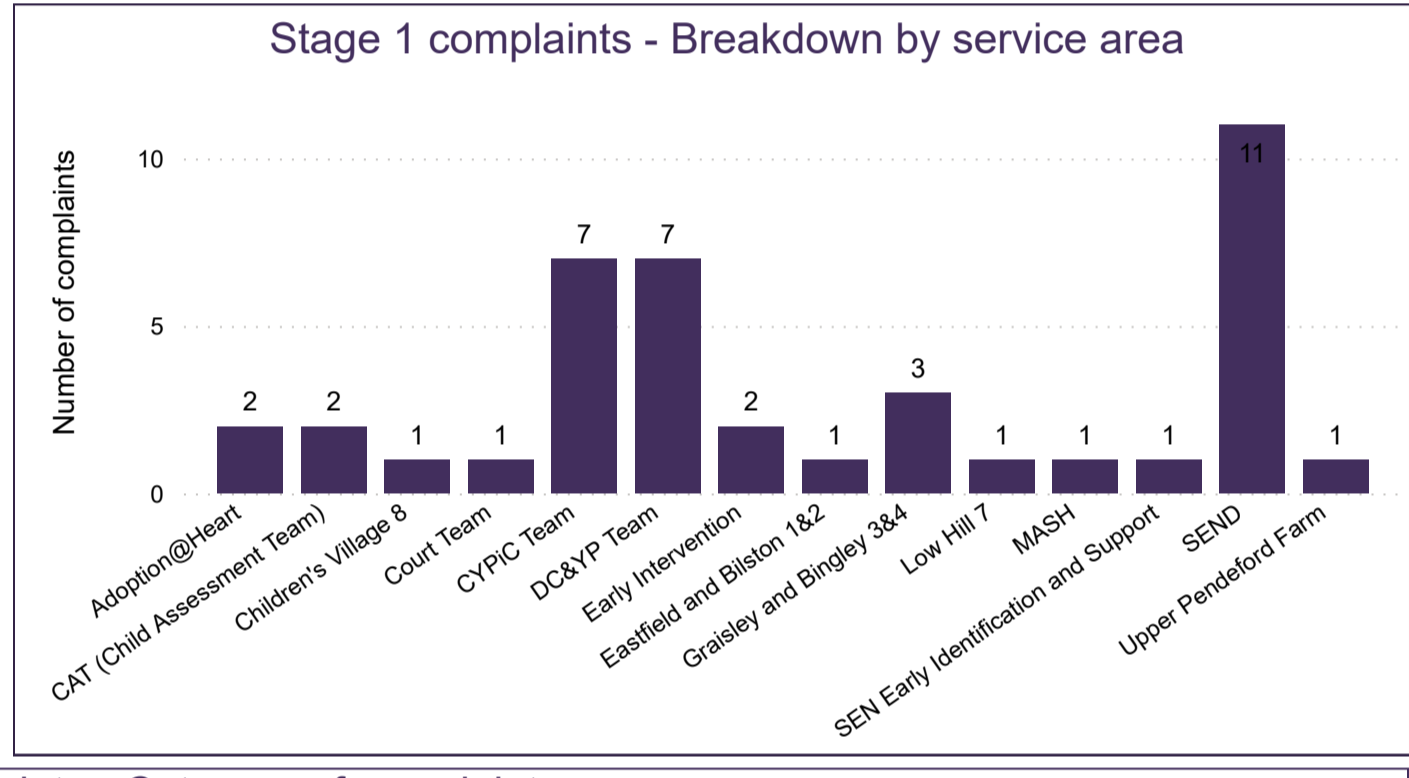
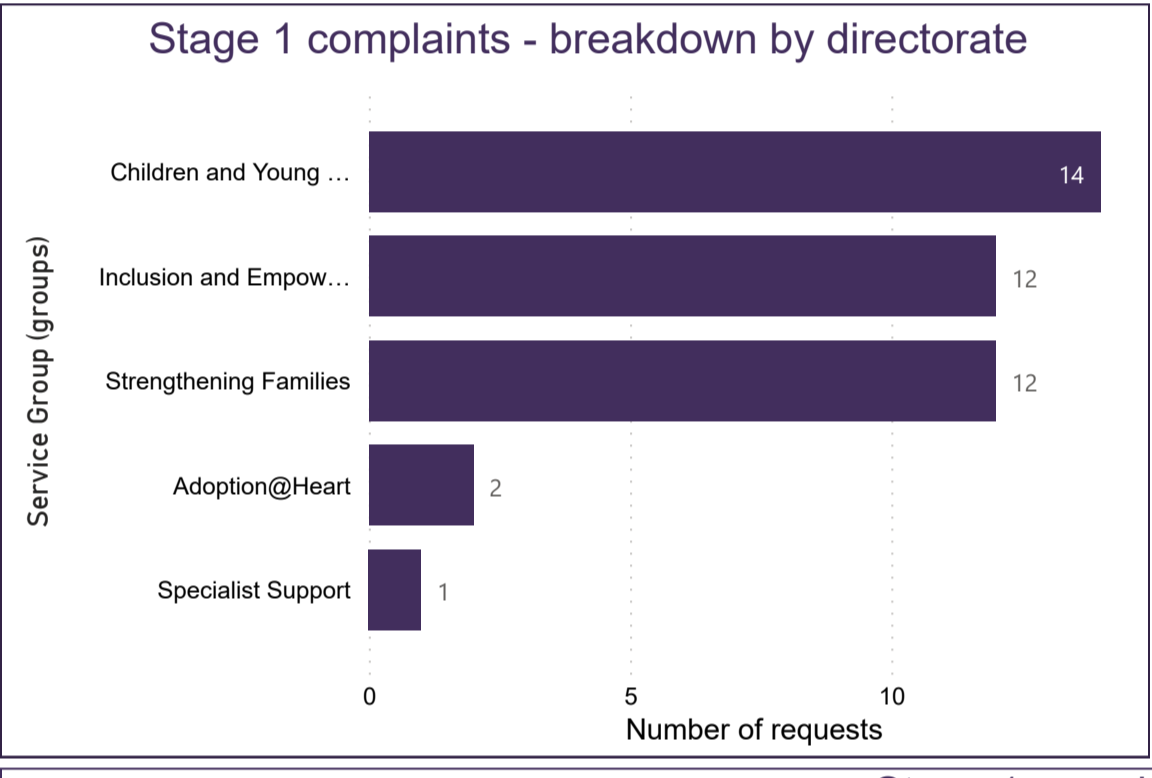
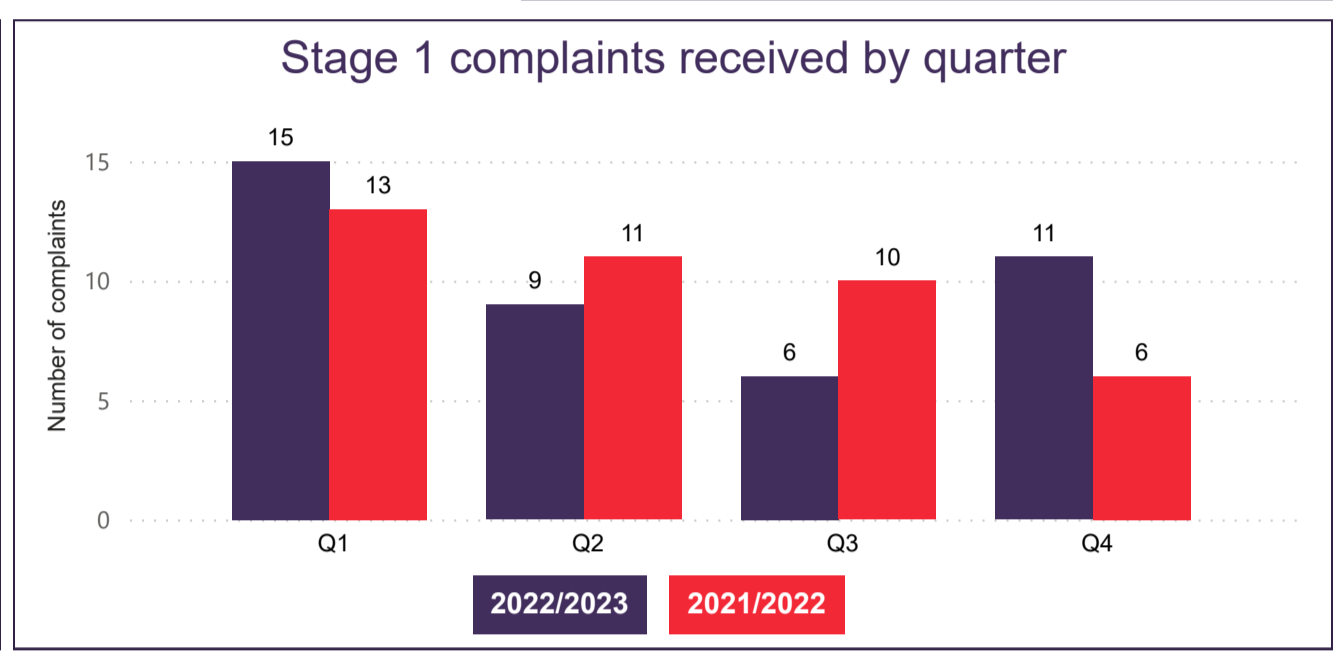
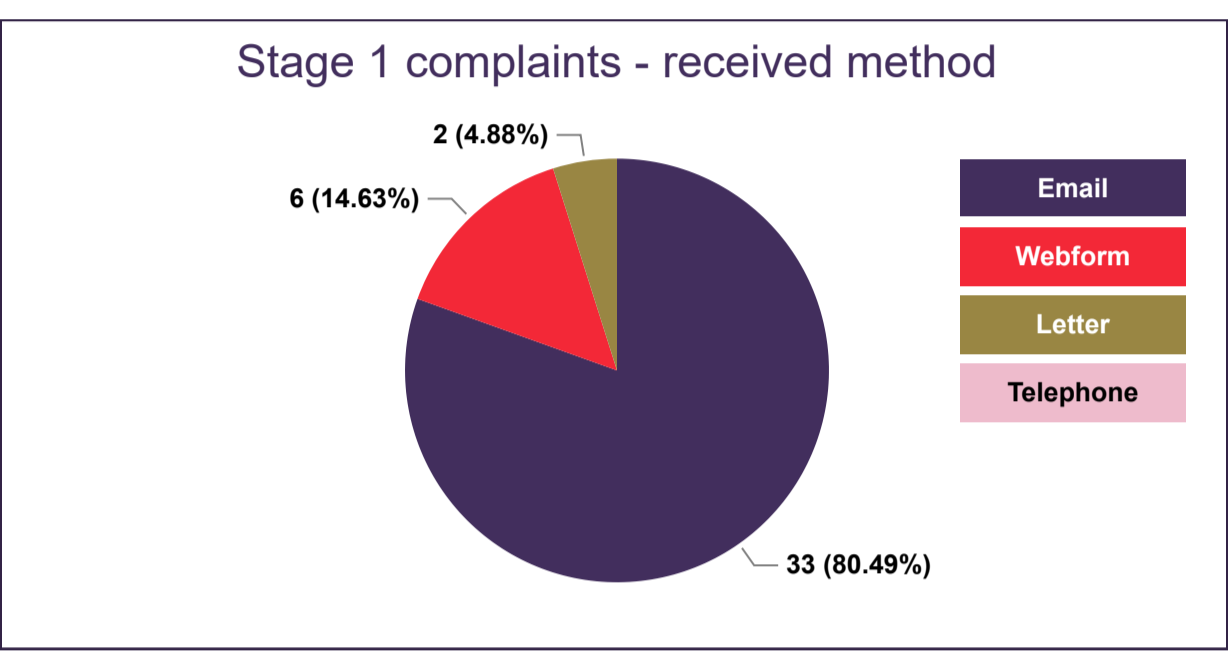
Average response days (working days)

Comparison to previous year

<b>2022/2023</b>	41
<b>2021/2022</b>	40

Difference: **1**

In comparison to 2021/2022 an increase has been seen in the number of stage 1 complaints received



**Stage 2 Complaints**

**6**

Stage 2 complaints received

**0**

Stage 2 complaints not upheld (council is not at fault)

**5**

Stage 2 complaints part upheld (council is partly at fault)

**1**

Stage 2 complaints upheld (council is at fault)

Corporate complaints procedure

**2**

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Statutory complaints procedure

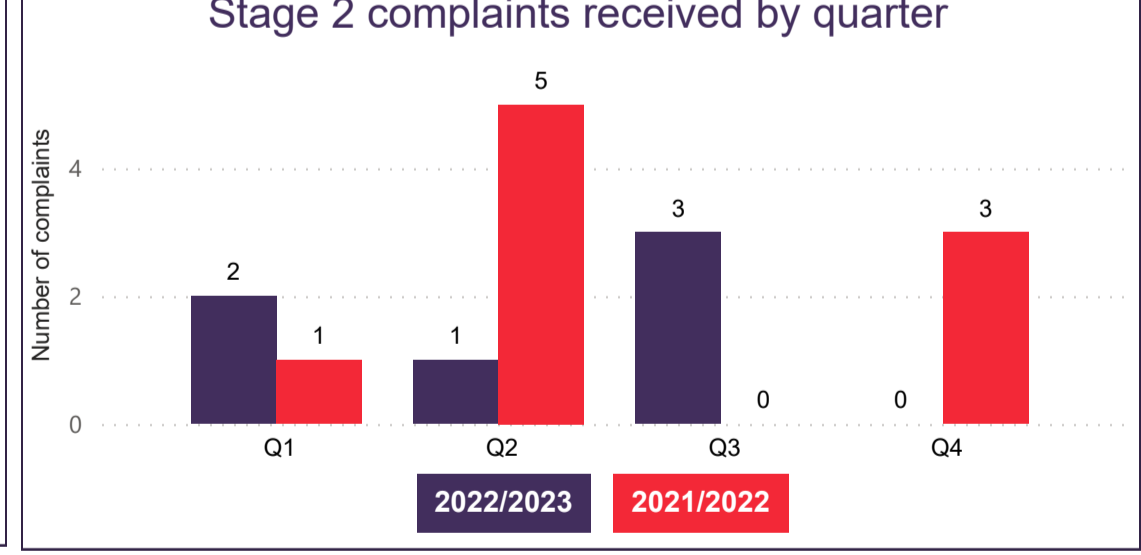
**4**

Comparison to previous year

<b>2022/2023</b>	6
<b>2021/2022</b>	9

Difference: **-3**

In comparison to 2021/2022 a decrease has been seen in the number of stage 2 complaints received



**Compliments, Informal Complaints and Stage 3 Complaints**



Stage 3 complaints received

**0**

Corporate complaints procedure

**0**

Statutory complaints procedure

Comparison to previous year

<b>2022/2023</b>	0
<b>2021/2022</b>	0

Difference: **0**

In comparison to 2021/2022 no change has been seen in the number of stage 3 complaints received.

**Select a service:**

Adults | Children's | Corporate | Public Health

**Select a year:**

2021/2022 | 2022/2023 | 2023/2024

**Select a quarter:**

Q1 | Q2 | Q3 | Q4

**Stage 1 Complaints**

<b>25</b> Stage 1 complaints received	<b>9</b> Stage 1 complaints not upheld (council is not at fault)	<b>9</b> Stage 1 complaints part upheld (council is partly at fault)	<b>7</b> Stage 1 complaints upheld (council is at fault)
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**Corporate complaints procedure**

1 Complaints received | 54 Average response days (calendar days)

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**Statutory complaints procedure**

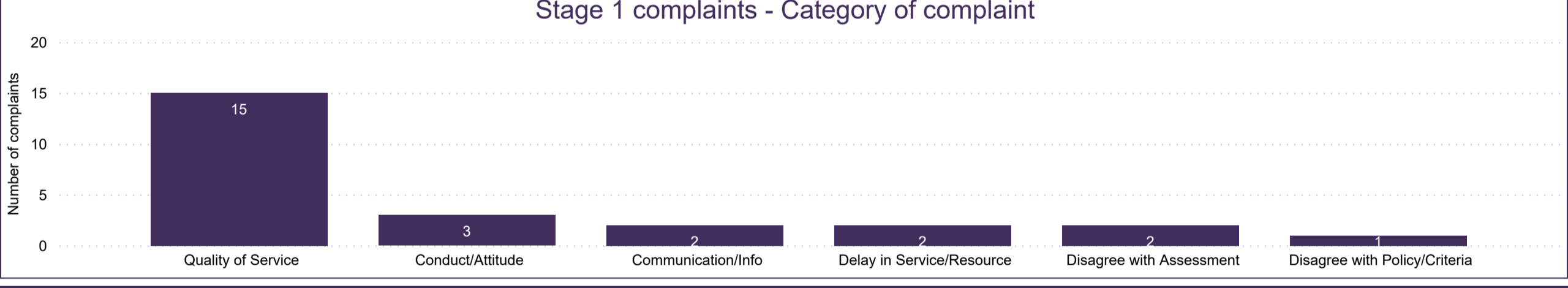
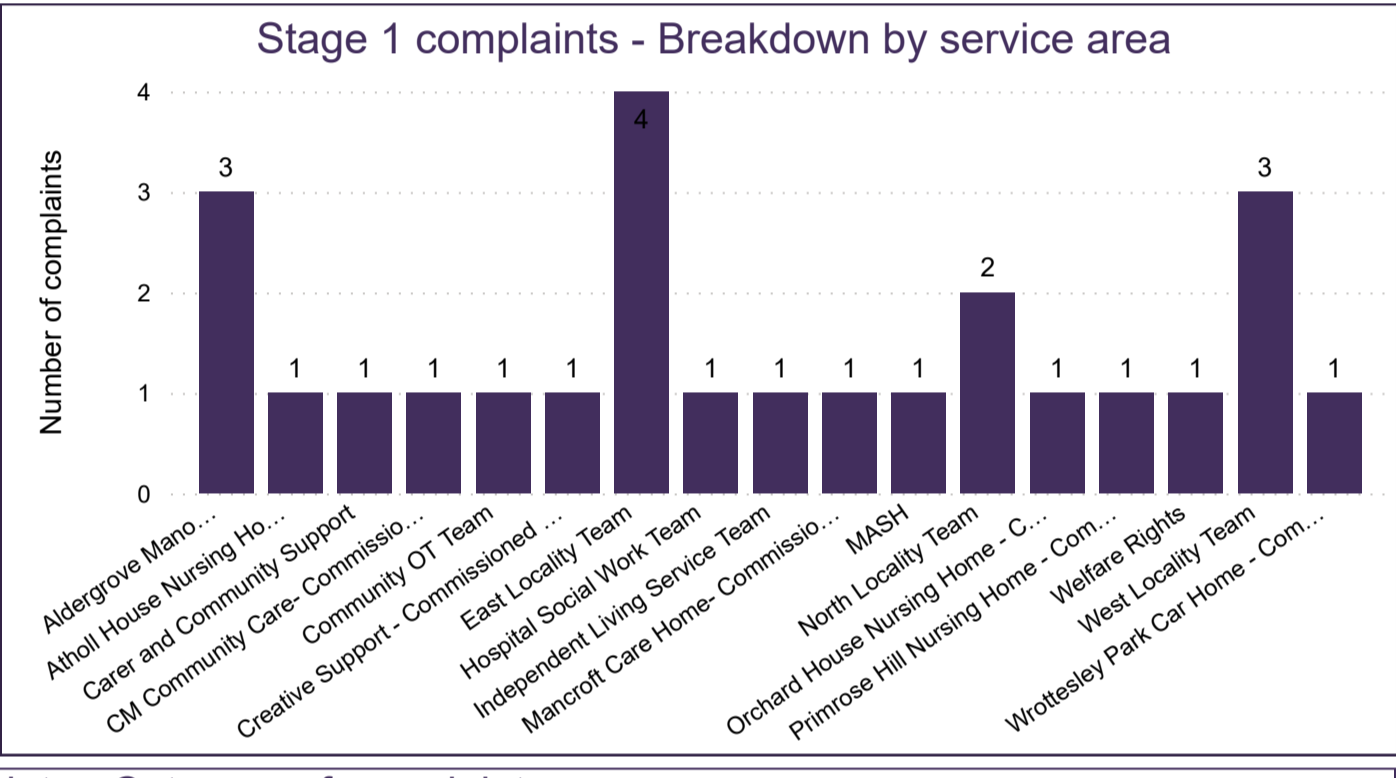
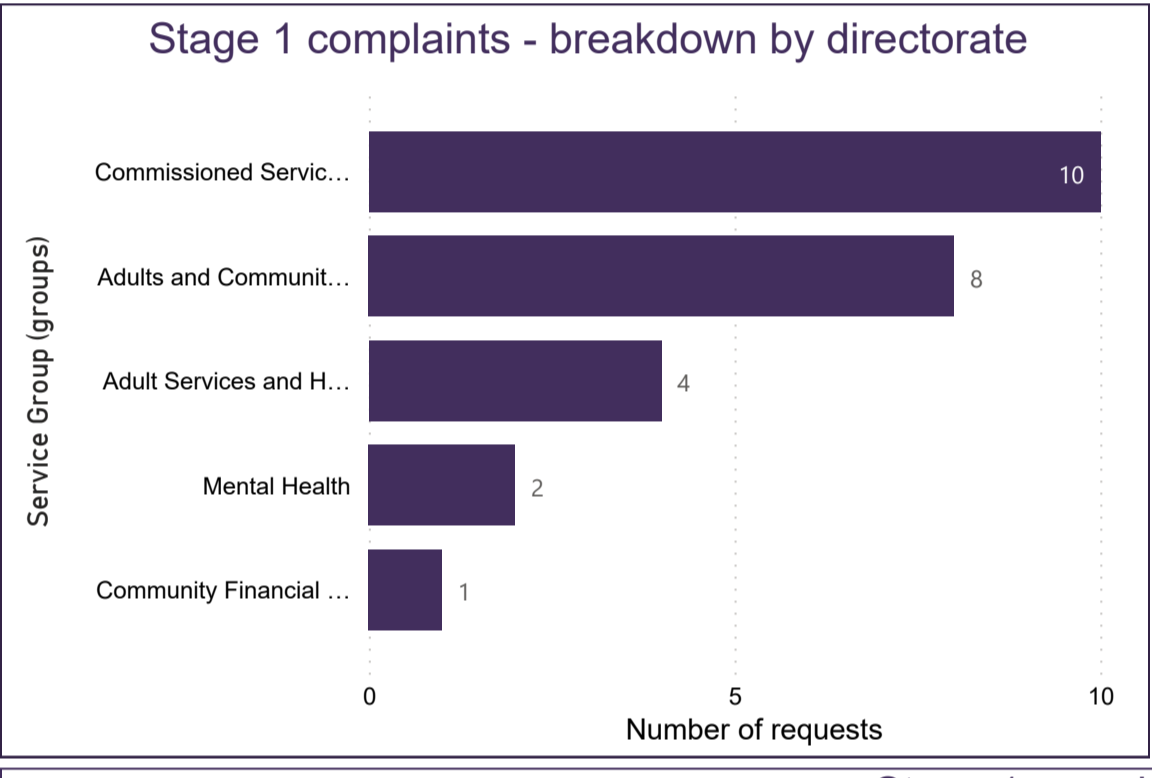
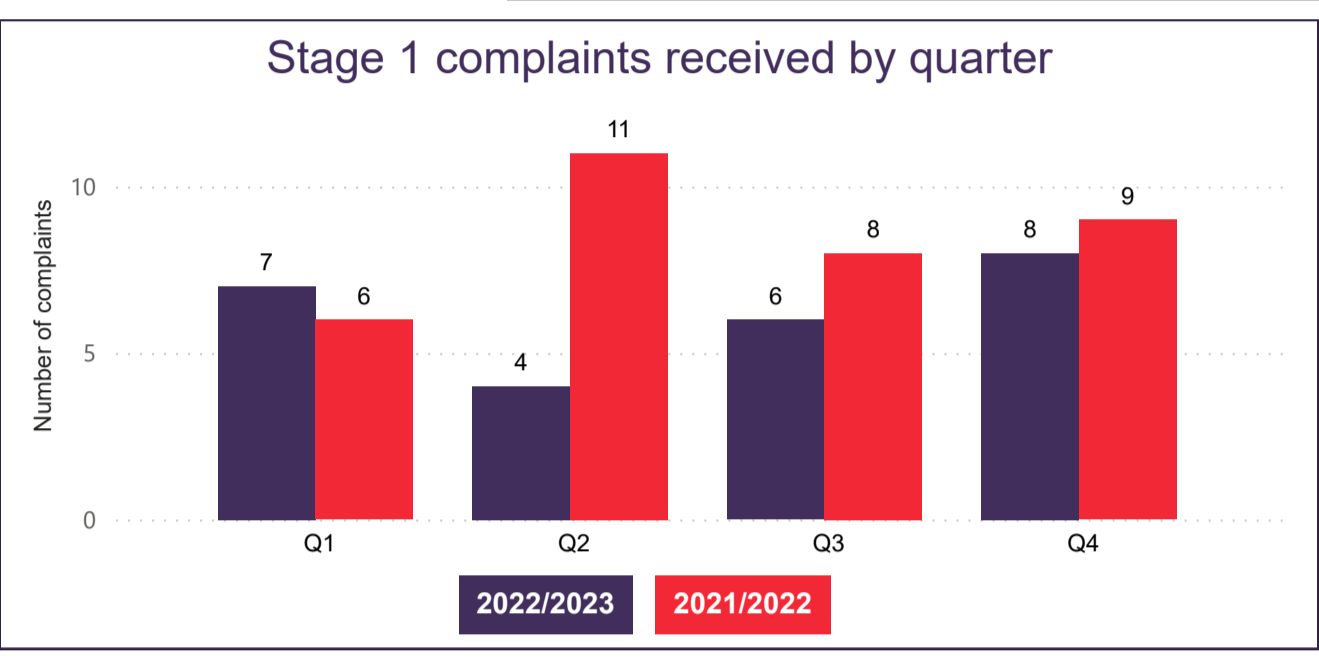
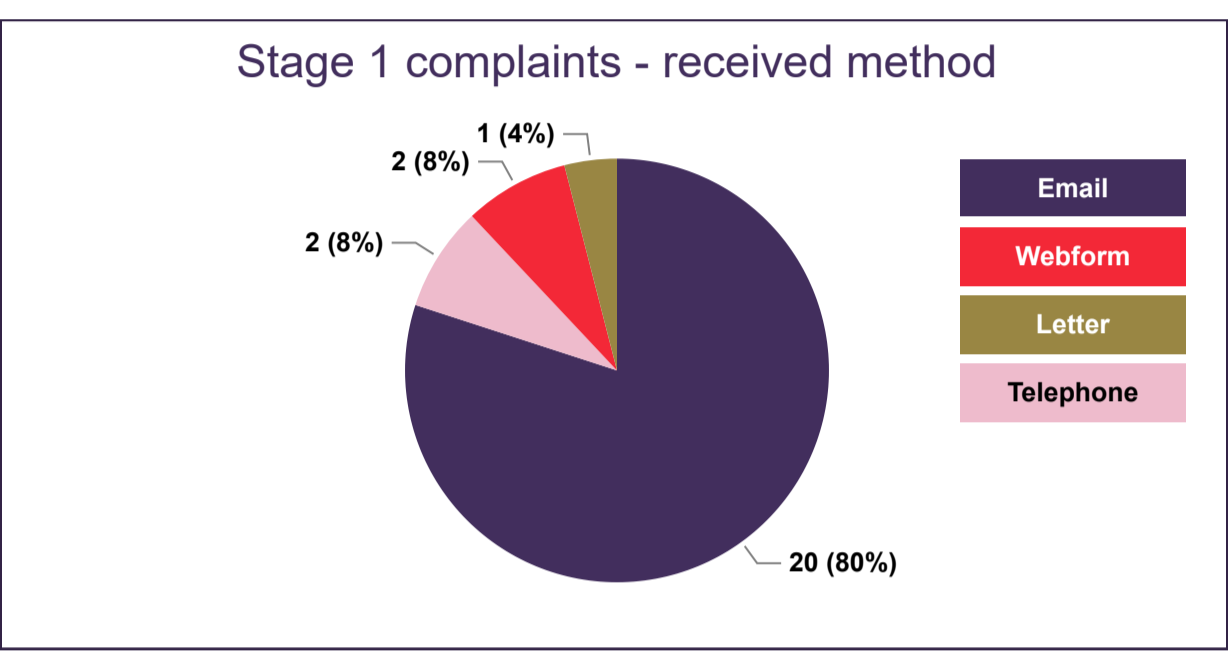
24 Complaints received | 16 Average response days (working days)

**Comparison to previous year**

2022/2023: 25  
2021/2022: 34

Difference: -9

In comparison to 2021/2022 a decrease has been seen in the number of stage 1 complaints received



**Stage 2 Complaints**

<b>0</b> Stage 2 complaints received	<b>0</b> Stage 2 complaints not upheld (council is not at fault)	<b>0</b> Stage 2 complaints part upheld (council is partly at fault)	<b>0</b> Stage 2 complaints upheld (council is at fault)
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**Corporate complaints procedure**

0 Complaints received

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**Statutory complaints procedure**

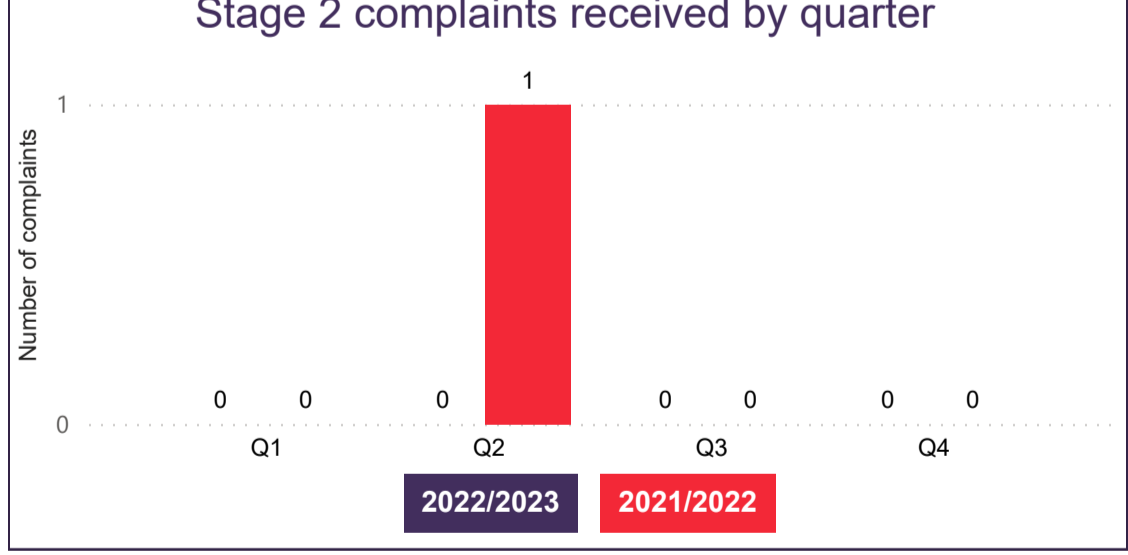
0 Complaints received

**Comparison to previous year**

2022/2023: 0  
2021/2022: 1

Difference: -1

In comparison to 2021/2022 a decrease has been seen in the number of stage 2 complaints received



**Compliments and Informal Complaints**

**Informal complaints received**

72

**Compliments received**

472

**Select a service:**

Adults | Children's | Corporate | **Public Health**

**Select a year:**

2021/2022 | **2022/2023** | 2023/2024

**Select a quarter:**

Q1 | Q2 | Q3 | Q4

**Stage 1 Complaints**

**1**

Stage 1 complaints received

**0**

Stage 1 complaints not upheld (council is not at fault)

**1**

Stage 1 complaints part upheld (council is partly at fault)

**0**

Stage 1 complaints upheld (council is at fault)

Corporate complaints procedure

**1** | **21**

Complaints received | Average response days (calendar days)

---

Statutory complaints procedure

**0** | **0**

Complaints received | Average response days (working days)

Comparison to previous year

**2022/2023** | **1**

**2021/2022**

Difference: **1**

In comparison to 2021/2022 an increase has been seen in the number of stage 1 complaints received

Stage 1 complaints - received method

1 (100%)

- Email
- Webform
- Letter
- Telephone
- Not Recorded

Stage 1 complaints received by quarter

2022/2023 | 2021/2022

Stage 1 complaints - breakdown by directorate

Public Health: 1

Stage 1 complaints - Breakdown by service area

WV Active Leisure: 1

Stage 1 complaints - Category of complaint

Delay in Service/Resource: 1

**Stage 2 Complaints**

**0**

Stage 2 complaints received

**0**

Stage 2 complaints not upheld (council is not at fault)

**0**

Stage 2 complaints part upheld (council is partly at fault)

**0**

Stage 2 complaints upheld (council is at fault)

Corporate complaints procedure

**0**

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Statutory complaints procedure

**0**

Comparison to previous year

**2022/2023** | **0**

**2021/2022**

Difference: **0**

In comparison to 2021/2022 no change has been seen in the number of stage 2 complaints received

Stage 2 complaints received by quarter

2022/2023 | 2021/2022

**Compliments and Informal Complaints**

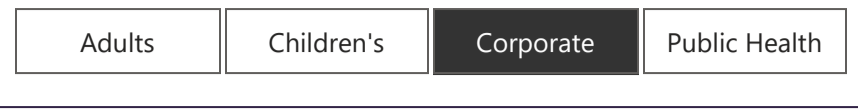
Informal complaints received

**4**

Compliments received

**1**

Select a service:



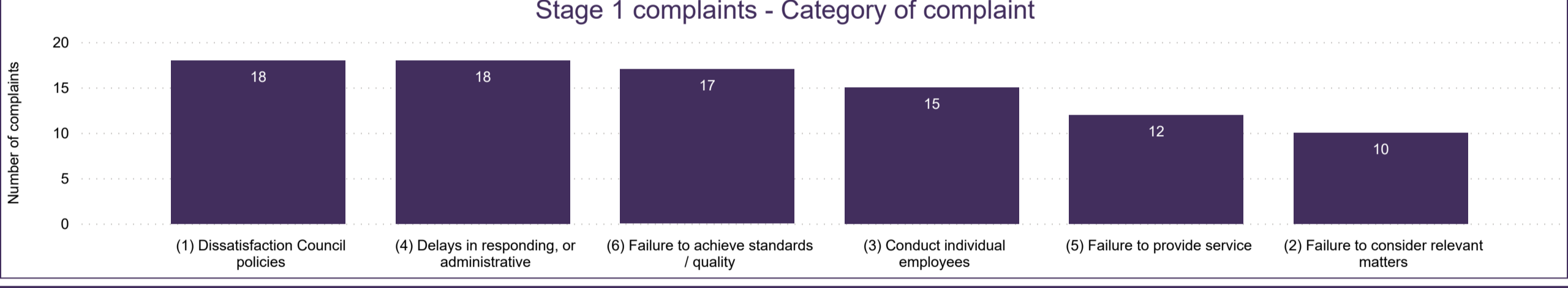
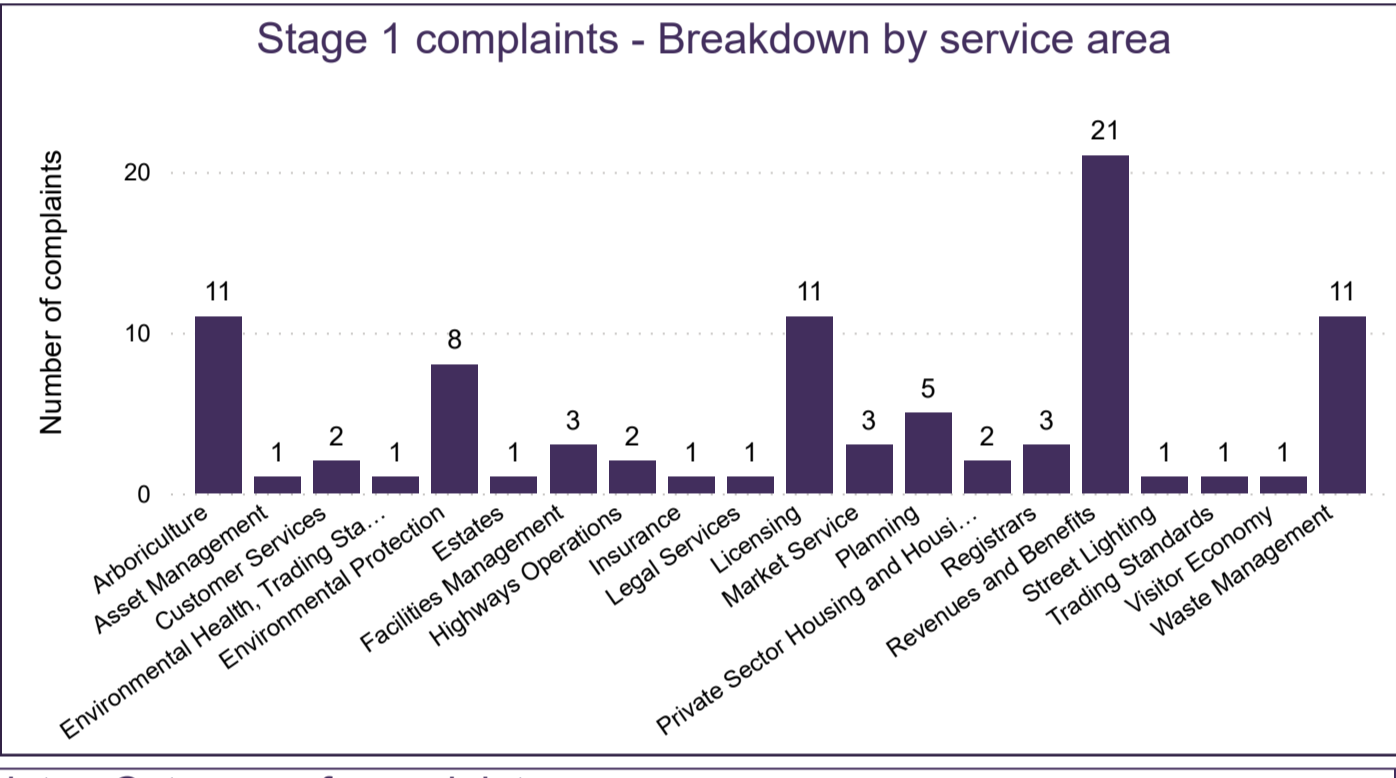
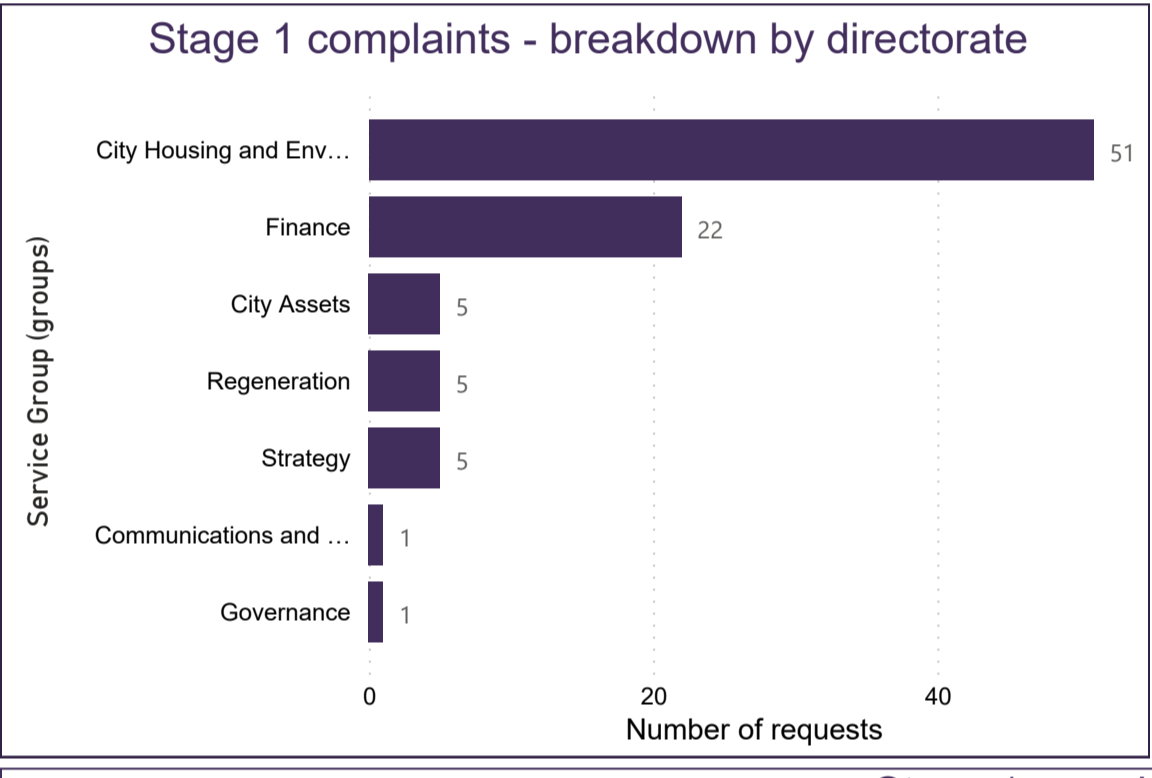
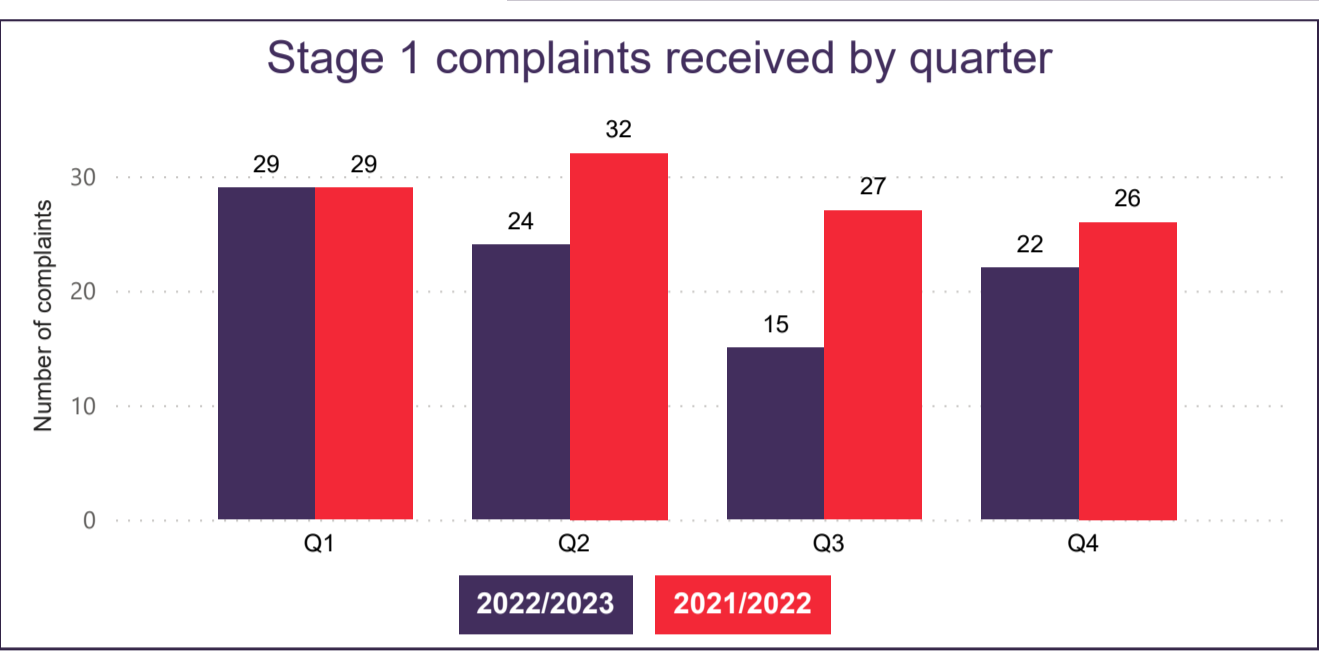
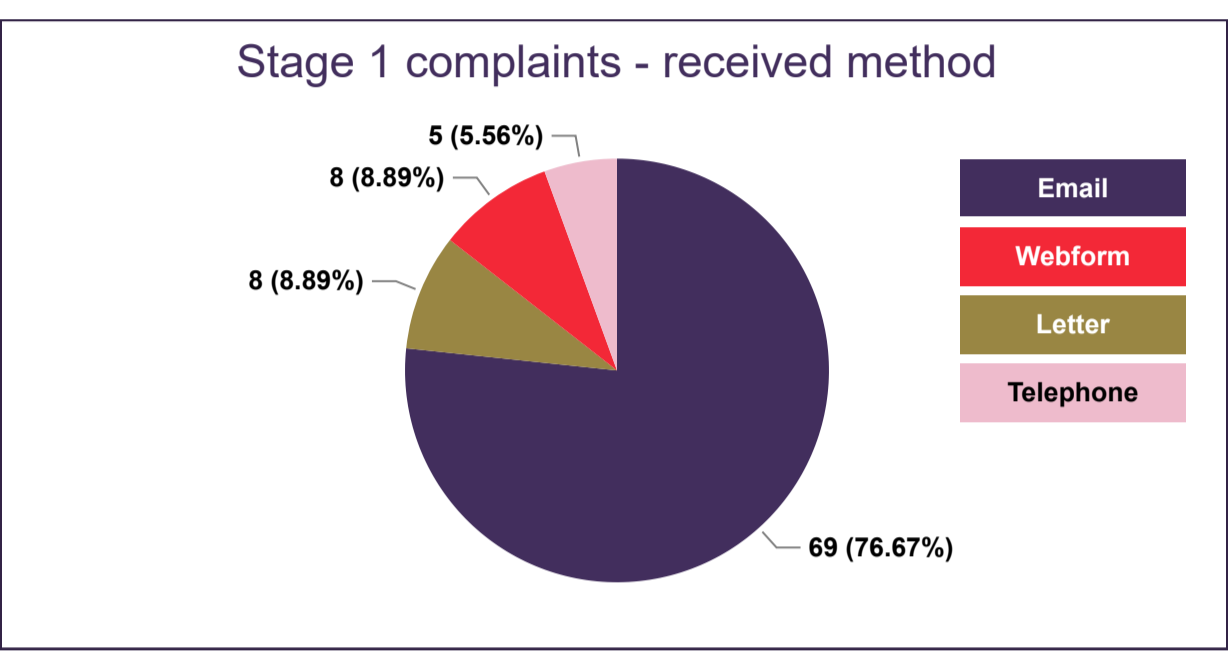
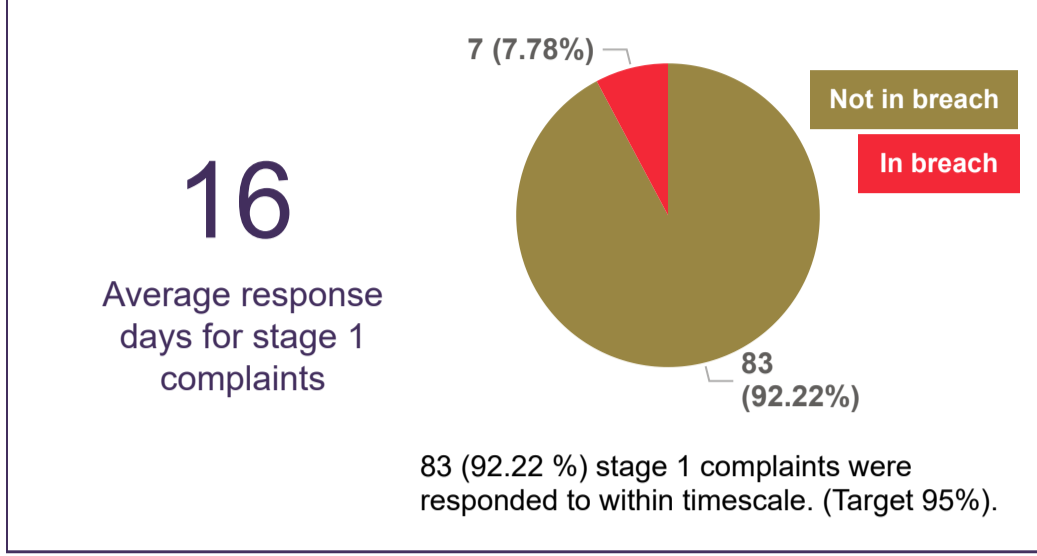
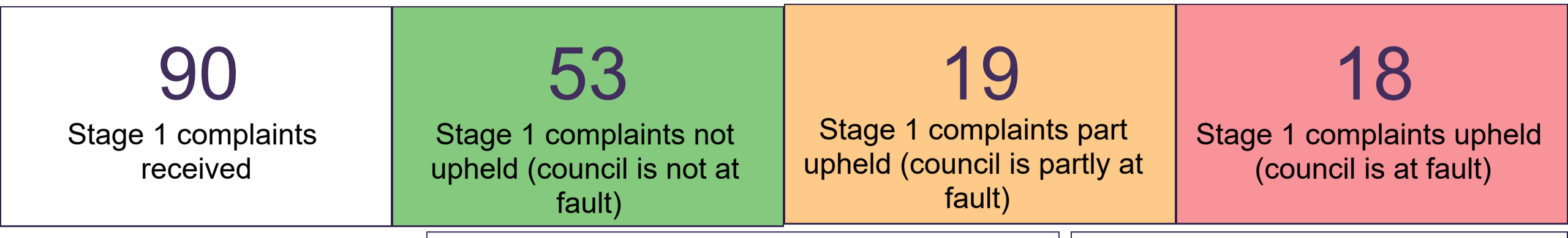
Select a year:



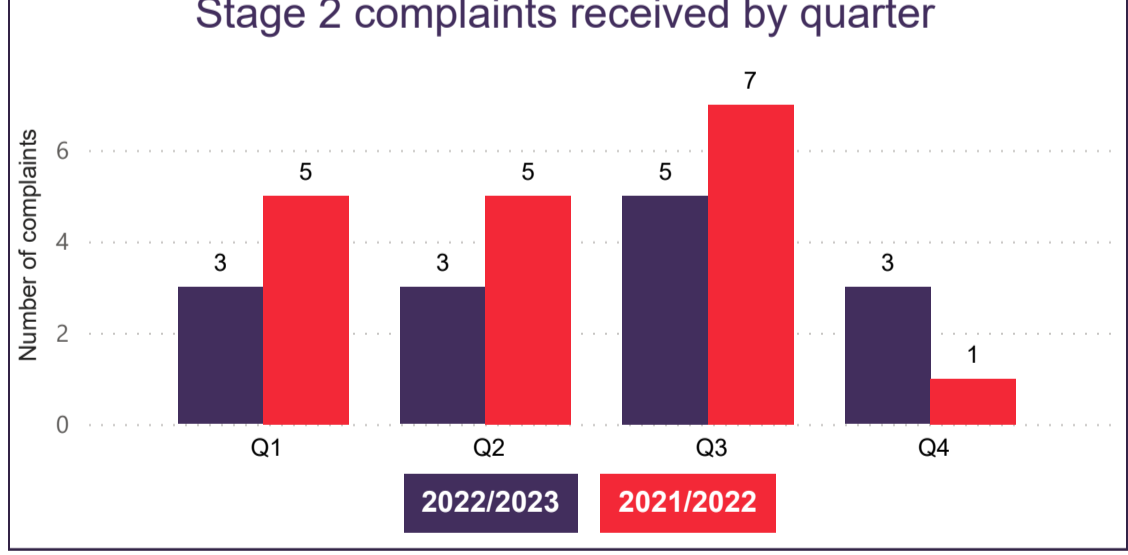
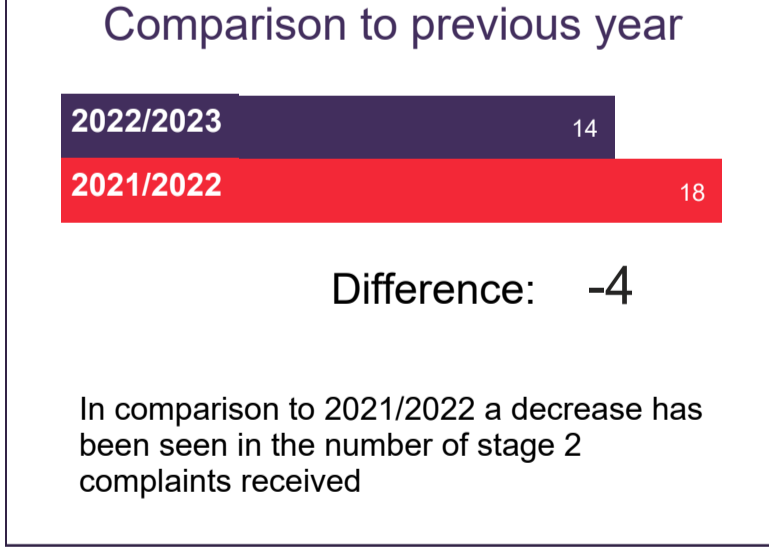
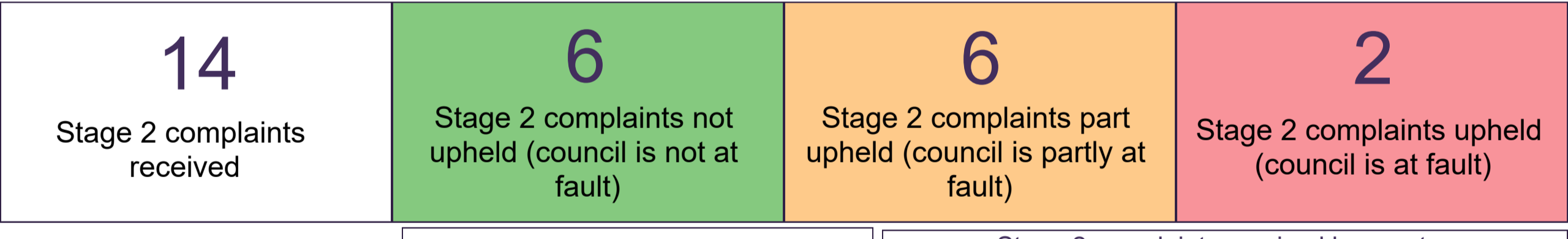
Select a quarter:



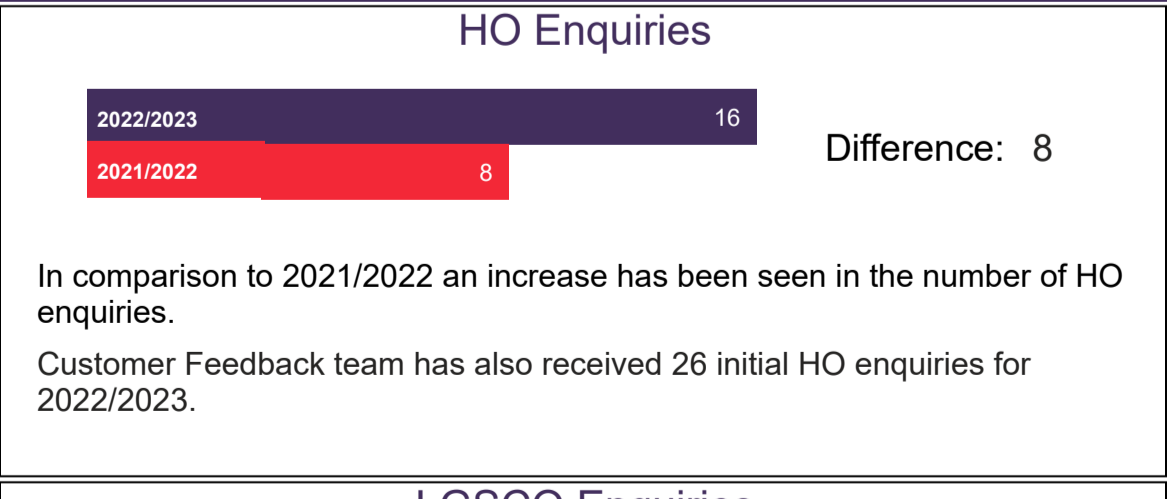
Stage 1 Complaints



Stage 2 Complaints



Compliments, Service Requests, HO and LGSCO Enquiries



Complaint details	Ombudsman Outcome/Requirement	Lessons/Action Timeframe
<p><b>Adult Services Mental Health Team</b> received one complaint in relation to service and support received in supporting living accommodation and interruptions to schedule causing stress and anxiety</p>	<p><b>Outcome</b> upheld, fault and injustice;</p> <ul style="list-style-type: none"> <li>Provide a written apology to complainant which acknowledges the quality of support received due to staff absence was not to standard.</li> <li>Pay £300 to acknowledge the impact on the support received</li> </ul>	<ul style="list-style-type: none"> <li>Apology sent to complainant</li> <li>Payment of £300 issued to complainant</li> </ul> <p>Note: Staff absences were due to Covid 19 impact and staff isolating in accordance with national guidelines</p>
<p><b>Adult Services and Health Partnership and Commissioned Services</b> received one complaint in relation to respite care received by care home</p>	<p><b>Outcome</b> not upheld, no maladministration;</p>	<p>N/A</p>
<p><b>Finance</b> received one complaint in relation to tenants' applications for housing benefit</p>	<p><b>Outcome</b> upheld, fault and injustice;</p> <ul style="list-style-type: none"> <li>Appeals to be passed to Tribunal without delay (within 4wks)</li> </ul>	<ul style="list-style-type: none"> <li>Appeals staff informed of implications</li> <li>Appeals to be submitted within four weeks</li> <li>Direction from the Tribunal should be requested if we considered that further evidence was required</li> </ul>

Complaint details	Ombudsman Outcome/Requirement	Lessons/Action Timeframe
<p><b>City Housing and Environment</b> received one complaint in relation to council's delays in dealing with private hire vehicle driver's licence</p>	<p><b>Outcome</b> upheld: no further action; LGSCO has confirmed that the council had already remedied –</p> <ul style="list-style-type: none"> <li>No investigation by LGSCO</li> </ul>	<ul style="list-style-type: none"> <li>Timescales for replying to licencing application reviewed by the service to ensure further delays not incurred</li> </ul>
<p><b>Children's Services</b> received one complaint in relation to failure to issue an amended Education Health and Care plan within the required time limit;</p> <p>LGSCO satisfied with how the service shares amended EHC plans following tribunal</p>	<p><b>Outcome</b>, upheld, fault and injustice;</p> <ul style="list-style-type: none"> <li>Apologise to complainant for delays and poor communication</li> <li>Review how the service monitors and arranges social care assessments for disabled children to ensure it completes these within a reasonable period of time.</li> <li>Pay £250 to recognise the delays</li> </ul>	<ul style="list-style-type: none"> <li>Service reviewed the arrangement of social care assessment for disabled children</li> <li>Apology and payment of £250 issued to complainant</li> </ul>
<p><b>Adult Services</b> received one complaint in relation to safeguarding enquiry at care home/care provider</p>	<p><b>Outcome</b> upheld fault and injustice;</p> <ul style="list-style-type: none"> <li>the Council will remind the care provider about the importance of raising safeguarding alerts immediately and keeping a record of safeguarding referrals</li> </ul>	<ul style="list-style-type: none"> <li>Commissioning Team contacted the Provider who has confirmed that they will adhere to Safeguarding Policies and Procedures and raising safeguarding alerts immediately whilst keeping relevant record of all safeguarding referrals. The Provider will continue to liaise with Quality Assurance Lead in the Commissioning Team at the Council</li> </ul>

Complaint details	Ombudsman Outcome/Requirement	Lessons/Action Timeframe
<p><b>Wton Homes/City Housing and Environment</b> received one complaint in relation to fault in its handling of an application to its housing allocations scheme, how it determined the priority banding on the scheme and how it has considered bids for properties</p>	<p><b>Outcome</b> upheld, fault and injustice;</p> <ul style="list-style-type: none"> <li>Provide a letter of apology to the complainant for the delay found in forwarding the request for a review of the council's decision on the medical priority</li> </ul>	<ul style="list-style-type: none"> <li>Apology letter issued to the complainant in relation to the delays established in requesting a review of the decision</li> </ul>
<p><b>Children's Services/Third party provider/agency</b> received one complaint in relation to how the Council and its Agency dealt with his request for information and council/agency's complaint handling process and communication</p>	<p><b>Outcome</b> upheld, fault and injustice;</p> <ul style="list-style-type: none"> <li>Provide a letter of apology again in writing to the complainant for the distress caused by the delays and poor handling of their complaint</li> </ul>	<ul style="list-style-type: none"> <li>Apology letter issued to the complainant for the distress caused by the delays and poor handling of complaint</li> </ul>

Complaint details	Ombudsman Outcome/Requirement	Lessons/Action Timeframe
<p><b>City Housing and Environment</b> received one complaint in relation how the council has managed noise complaint and about the Council's poor responses</p>	<p><b>Outcome</b> upheld, fault and injustice;</p> <ul style="list-style-type: none"> <li>• Provide a letter of apology to the complainant for the initial delay in dealing with her noise enquiry and lack of communication</li> <li>• Pay £150 to acknowledge the unnecessary time and trouble spent contacting the Council for a response</li> </ul>	<ul style="list-style-type: none"> <li>• Apology letter issued to the complainant for the initial delay in dealing with the noise enquiry and lack of communication</li> <li>• Payment of £150 issued to the complainant for the time and trouble spend contacting the Council for a response</li> </ul>
<p><b>Children's Services</b> received one complaint about how the Council dealt with Education, Health and Care needs assessment and plan and about how the Council dealt with a carer assessment application</p>	<p><b>Outcome</b> upheld, fault and injustice;</p> <ul style="list-style-type: none"> <li>• Provide a letter of apology again to the complainant in recognition of the injustice caused by its delays in dealing with EHC needs assessment and with issuing final EHC Plan</li> <li>• Pay £500 in recognition of the loss of some provision as contained in the final EHC Plan due to the Council's delays and pay £250 to acknowledge the distress and avoidable time and trouble caused for chasing updates with the final EHC Plan</li> <li>• Carry out training or other means remind staff of the importance of adhering to the Council's complaint procedure / timescales at stage one of the complaints procedure</li> <li>• Produce an action plan to demonstrate how the Council will meet statutory timescales for EHC needs assessments and EHC Plans</li> </ul>	<ul style="list-style-type: none"> <li>• Apology letter issued to the complainant for delays in dealing with EHC needs assessment and issuing the final EHC plan</li> <li>• Payment of £500 issued to complainant for loss of provision contained in the EHC Plan and £250 to acknowledge distress and time, trouble caused for chasing updates for the final EHC Plan</li> <li>• Officers reminded to carry out online children's and corporate complaint training via learning hub</li> <li>• Council has completed work relating to a Written Statement of Action; compliance is now at 70% for 2023 (above national average when compared to 2022) and our average compliance for the last 3 months is 83%. This is monitored every week with officers as business as usual</li> </ul>



<b>CITY OF WOLVERHAMPTON COUNCIL</b>	<b>Governance and Ethics Committee</b> 7 September 2023
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<b>Report title</b>	Information Governance – Annual Report to SIRO 2022-2023	
<b>Cabinet member with lead responsibility</b>	Councillor Paula Brookfield Cabinet Member for Governance and Equalities	
<b>Accountable director</b>	David Pattison, Chief Operating Officer	
<b>Originating service</b>	Information Governance, People and Change	
<b>Accountable employee</b>	Anna Zollino- Biscotti	Head of IG & Customer Assurance
	Tel	01902 555166
	Email	<a href="mailto:Anna.zollino-biscotti@wolverhampton.gov.uk">Anna.zollino-biscotti@wolverhampton.gov.uk</a>
<b>Report has been considered by</b>	Strategic Executive Board	22 August 2023

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**Recommendation for action or decision:**

The Governance and Ethics Committee is recommended to:

1. Note the contents of the Information Governance annual Report to SIRO which provides a summary of the work carried out under the Information Governance function for the period 2022-2023.

## **1.0 Purpose**

- 1.1 To provide a summary of the work carried out by the Information Governance function for the period April 2022 to March 2023, as outlined in the Annual Report to SIRO.

## **2.0 Background**

- 2.1 The Council has had a robust information governance framework in place for many years following the initial consensual audits with the regulator, the Information Commissioner's Office (ICO) which took place in 2011 and 2012.
- 2.2 Work has continued since the conclusion of the audits and a strategic approach to information governance has been adopted to ensure that the Council appropriately manages its information assets; this includes managing data protection as a corporate risk and monitoring the risk via the Council's Strategic Risk Register.
- 2.3 This report provides an update relating to the responsibilities of the Council's Senior Information Risk Owner (SIRO) and outlines information governance activity and performance during the period April 2022 to March 2023. It provides assurances that information risks are being effectively managed, highlighting any key risks and areas to focus on throughout the year as well as an overview of progress in general.

## **3.0 Summary Statement**

- 3.1 Despite a challenging year in terms of resource capacity across the wider service function and seemingly increased demand both internal and external, the Information Governance (IG) team has continued to maintain its exemplary eight-year record of ensuring the Council meets its statutory compliance deadlines in relation to Data Protection and Freedom of Information Acts.
- 3.2 The IG team have continued to forge stronger working relationships with leadership teams, resulting in earlier engagement, better integration, and a more robust compliance platform for each individual leadership area.
- 3.3 Information risks have in most cases been reduced across the year or maintained at an acceptable level. Any residual risk rated amber or red have been transferred to the 2023-2024 IG risk register where they will continue to be monitored and managed
- 3.4 In summary, it is the consideration of the Council's Statutory Data Protection Officer (DPO) that the Council has complied with its duties under UK GDPR, Data Protection and Freedom of Information legislation.

## **4.0 Financial implications**

- 4.1 There are no financial implications associated with this report as Councillors are requested only to note the contents of the report summarising the work undertaken by the Information Governance function for the period April 2022 to March 2023. All of the work associated with meeting information governance requirements is undertaken utilising existing budgeted resources.

4.2 It is worth noting, however, that a failure to effectively manage information governance carries a financial risk. Inaccurate and out of date information can lead to poor decision making and a potential waste of financial resources. Following the implementation of the General Data Protection Regulation (GDPR), a two-tiered sanction regime with higher financial penalties is in place. Lesser information incidents can now be subject to a maximum fine of either €10 million or 2% of an organisation's global turnover, whichever is greater. More serious violations could result in fines of up to €20 million or 4% of turnover. [SR/21072023/A]

## **5.0 Legal implications**

5.1 The Council has a legal duty under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Freedom of Information Act 2000 and Environmental Information Regulations 2004 to appropriately manage and protect information assets.

5.2 Failure to effectively manage information governance could increase risk of exposure to fraud and malicious acts, reputational damage, an inability to recover from major incidents and potential harm to individuals or groups due to inappropriate disclosure of info.

5.3 The Information Commissioner has the legal authority to:

- Fine organisations for breaches of Data Protection 2018 or Privacy & Electronic Communication Regulations. Following the implementation of the UK GDPR a two-tiered sanction regime was introduced and higher financial penalties are being adopted by the ICO.
- Conduct assessments to check organisations are complying with the Act.
- Serve Enforcement Notices and 'stop now' orders where there has been a breach of the Act, requiring organisations to take (or refrain from taking) specified steps to ensure they comply with the law.
- Prosecute those who commit criminal offences under section 170 of the DPA 2018
- Conduct audits to assess whether organisations processing of personal data follows good practice.
- Report issues of concern to Parliament.

5.4 Demonstration of the Council's compliance with the current Data Protection Law protects it from legal challenges for alleged breaches of individuals' rights.

5.5 It is worth noting that as part of the UK's National Data Strategy and in line with its proposal to reform the UK's data protection laws, the government launched its consultation "Data: a new direction" in September 2021. The government response to the consultation was published in June 2022 and initial observations noted; however, a

watching brief is to be maintained on the upcoming Data Reform Bill to ensure the Council is conscious of any impending statutory changes. [TC/18072023/D]

## **6.0 Equalities implications**

6.1 No equalities implications have been identified, either through actions or recommendations of this progress update report or from the data presented within it.

## **7.0 Digital**

7.1 Collaborative work is already in place with Digital and IT and any new work initiatives identified from this progress report will be programmed into the IG work plan for the upcoming year. This will assist in ensuring that the Council has in place the appropriate technical measures outlined under data protection legislation and to ensure continued compliance.

## **8.0 Human Resources**

8.1 There are no new direct human resource implications identified. As part of their operational management duties, Managers will continue to monitor and encourage take up of the mandatory refresher IG training and take necessary action accordingly.

## **9.0 All other Implications**

9.1 There are no other implications arising from this report.

## **10.0 Schedule of background papers**

10.1 None for Consideration

## **11.0 Appendices**

11.1 Appendix 1: 2022-2023 Annual Report to SIRO

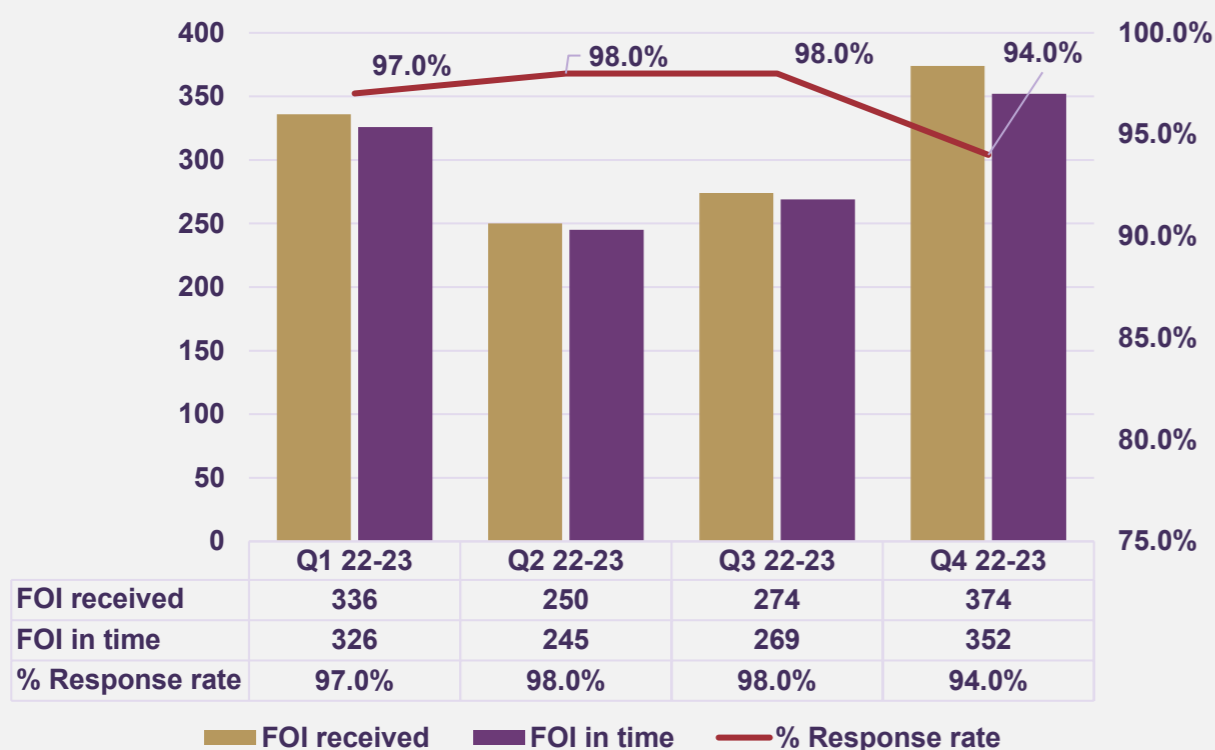
11.2 Appendix 2: Information Governance Annual Statistics Info-graph 2022-2023

# Information Governance

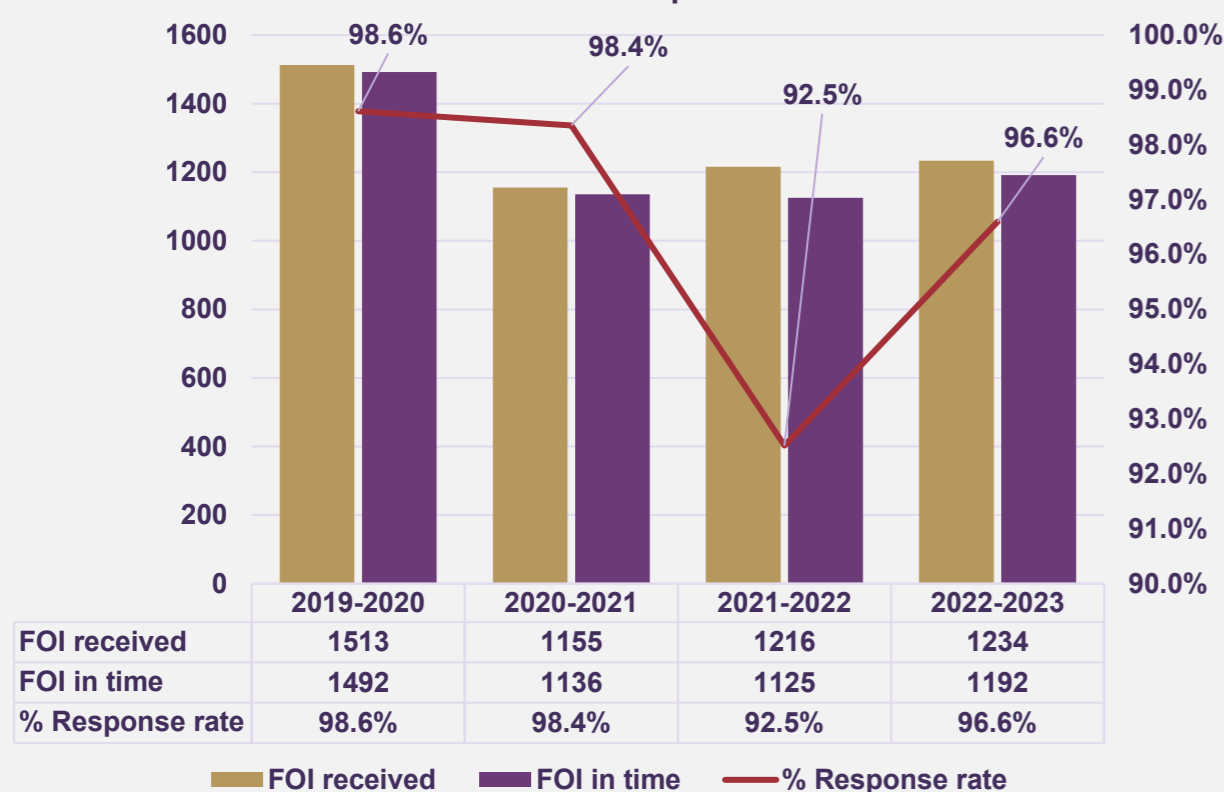
April 2022- March 2023

## Freedom of Information

FOI Quarterly Performance 2022/23



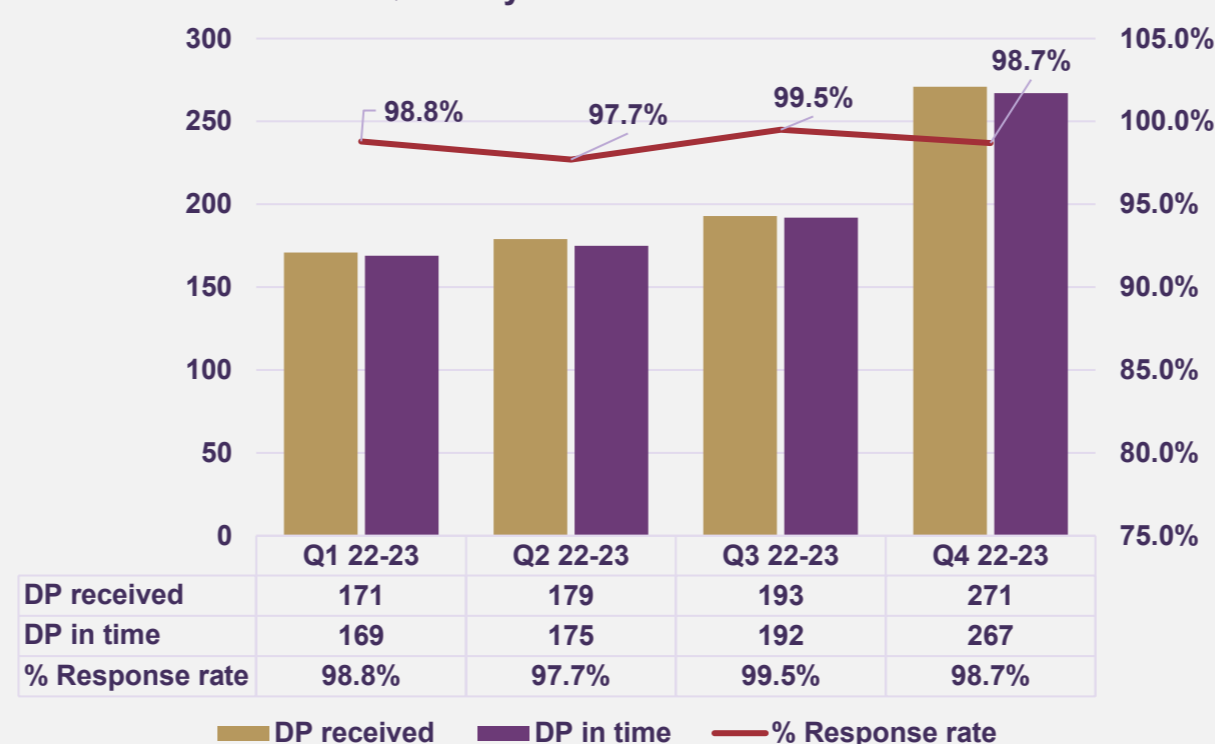
FOI Performance - Annual Comparison - 2019/20 to 2022/23



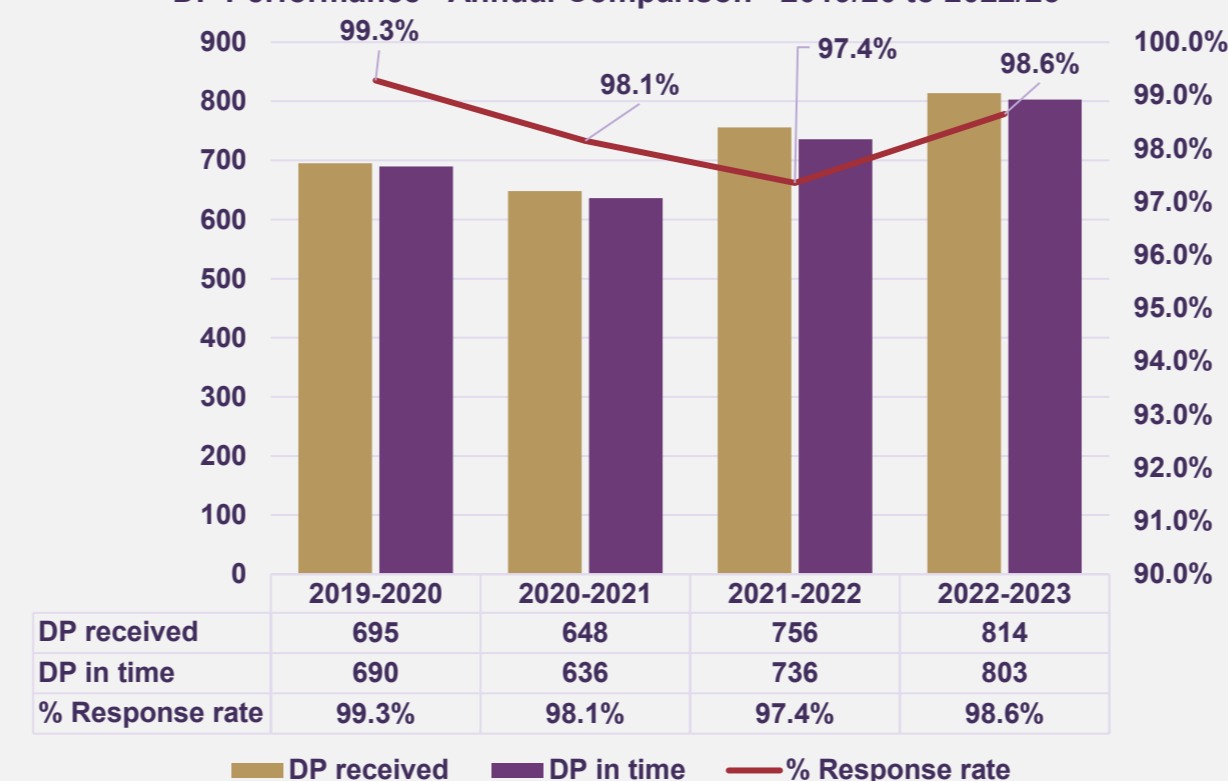
Performance has improved (4%) for the period in comparison to the figures at this point last year. The Council continues to exceed the 90% target response rate set by the regulatory authority the ICO. For Q4 25% of the increase in volume is due to the requests submitted by a single individual.

## Data Protection

DP Quarterly Performance - 2022/23



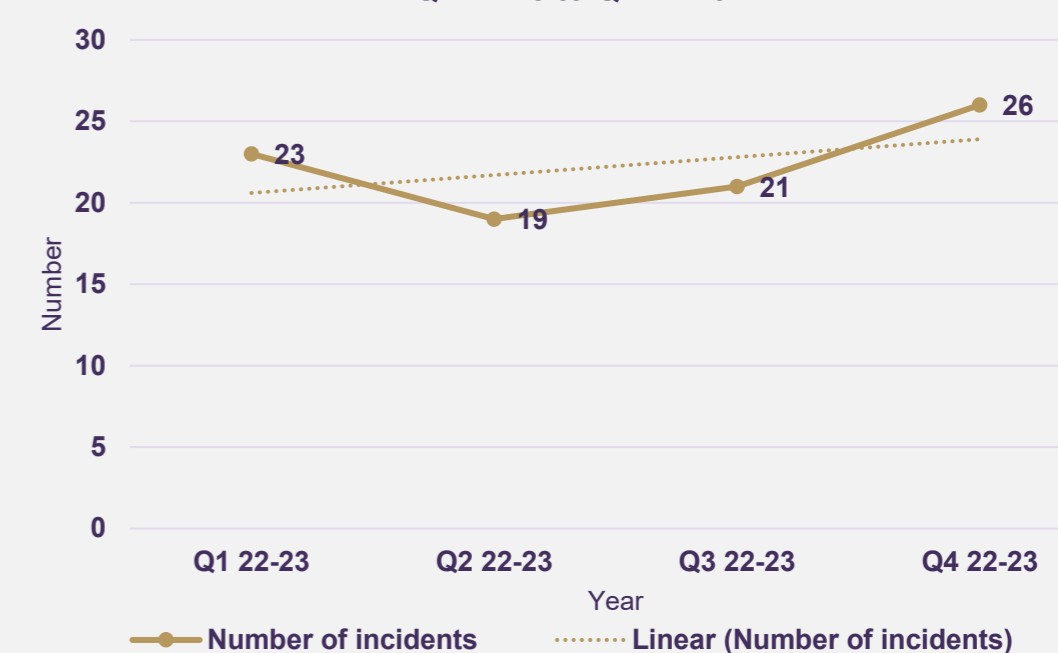
DP Performance - Annual Comparison - 2019/20 to 2022/23



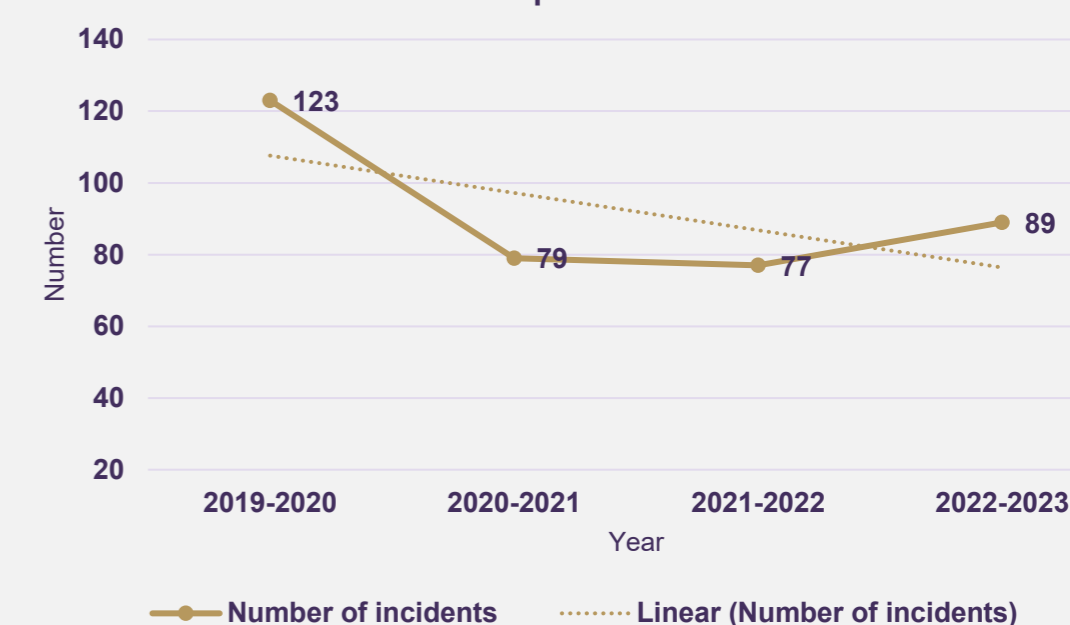
Performance has improved for the period in comparison with the figures from last year. Disclosure requests received from other professional bodies (Police, other LAs) continue to make up the bulk of requests received. Similar to FOI there has been a significant upswing in requests for Q4 than at other points of the year.

## Information Incidents

Number of incidents - Quarterly performance Q1 22-23 to Q4 22-23



Number of incidents to Annual Comparison 2019-20 to present



The volumes of incidents reported this year are comparable with the previous year, but are still reduced from those seen pre-pandemic levels. The largest category of breaches occurring continues to be emails or post sent to the wrong recipient. Two cases were of high enough risk to be reported to the ICO.

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# City of Wolverhampton Council

## 2022 - 2023 Annual SIRO Report



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Glossary of Terms



# DPO Assurance Statement

It is my consideration as the Council's Statutory Data Protection Officer (DPO) that the Council has complied with its duties under UK GDPR, Data Protection and Freedom of Information legislation.

Despite a challenging year in terms of resource capacity across the wider service function and seemingly increased demand both internal and external, the Information Governance (IG) team has continued to maintain its exemplary eight-year record of ensuring the Council meets its statutory compliance deadlines in relation to Data Protection and Freedom of Information Acts.

The IG team have continued to forge stronger working relationships with leadership teams, resulting in earlier engagement, better integration, and a more robust compliance platform for each individual leadership area. This working model will continue and be refined through 2023-2024, with some reset and refocus of priorities with each individual leadership areas having already taken place in the latter quarter of this year.

Information risks have in most cases been reduced across the year or maintained at an acceptable level. Any residual risk rated amber or red have been transferred to the 2023-2024 IG risk register where they will continue to be monitored and managed.

**Forward plan** – the focus for the next year is to continue to meet all statutory requirements and in doing so maintain the Council's high-performance standards. Residual work plan activities from the previous year, such as the delivery of role-based training for specialist roles will be completed as will the finalisation and publication of the four remaining ICT related procedure documents. Mandatory training uptake will continue to be monitored using the newly developed training dashboards and emphasis will be placed on managers to ensure compliance is maintained throughout the year for their teams. Focus will continue in terms of the council's approach to records management and digital document retention, with Audits being scheduled throughout the year with Internal Audit to assess the risk across the business. Collaborative working with key internal colleagues will continue to deliver consistent aligned strategic objectives; an area of focus for this year will be on the supply chain processes and mitigation of risks in this area - work with Procurement and Legal colleagues will be paramount in this. Another key priority on the IG work plan for the next year will be the review of the city-wide information sharing framework – findings and prospective proposals will be presented to the IG Board for approval during the year.

## Introduction

This report provides an update relating to the responsibilities of the Council's Senior Information Risk Owner (SIRO) and outlines information governance activity and performance during the 2022/23 financial year. It provides assurances that information risks are being effectively managed; what is going well; and where improvements are required. The report also provides assurances that personal data is held securely; information is disseminated effectively and provides an overview of key performance indicators relating to the Council's processing of information requests within the necessary legal frameworks.

The Annual Report:

- Provides an update on the action plans the Council has in place to minimise risk or improve performance.

- Documents organisational compliance with the legislative and regulatory requirements relating to the handling and processing of information and provides assurance of ongoing improvement to manage information risks.
- Details any serious information breaches within the preceding twelve months, relating to any losses of personal data or breaches of confidentiality.

The Council continues to be committed to effective information governance, with an information governance framework in place to ensure the council complies with legislation and adopts best practice; this is reviewed every two years or sooner as required by legislation. Governance arrangements are closely monitored via the Information Governance Board (IGB) and Senior Executive Board (SEB) and through the Caldicott Guardian function to ensure systems, policies and procedures are fit for purpose; and that all staff and elected members understand the importance of information governance and security so that good practice is everyone’s business and embedded as part of the Council’s culture.

## Statutory and Regulatory Activity - identifying the Council’s priorities and the associated risks

The Council is required by statute to provide or undertake certain functions in line with the following legislation or codes of practice:

- Data Protection Act 2018
- UK General Data Protection Regulations
- Freedom of Information Act 2000 (FOI)
- Environmental Information Regulations 2004 (EIR)
- Computer Misuse Act 1990
- Privacy and Electronic Communication Regulations 2003
- NHS IG - Data Security & Protection Toolkit
- Cyber Essentials Plus +
- PSN Certification
- Records Management under Section 46 of FOI and EIR
- BSI0008 Legal admissibility of scanned electronic information.

The Council is required to respond to Freedom of Information/Environmental Information requests (FOI/EIR) and Subject Access Requests (SAR) within statutory deadlines as mandated by the relevant Act.

The table below demonstrates the Council’s continued exemplary performance in relation to these targets.
















**Table 1.0 - Requests received, responded to and reported to the ICO - 2022 to 2023**

Statute	Number received/reported	% Requests responded on time	Escalated to ICO
Disclosures and Subject access requests under DPA	242 (SAR) + 572 (Disc) = 814	98.7%	0
FOI	1234	96.6%	3 from 13 Internal reviews
Information Incidents under DPA	89	N/A	2 (voluntary)
<b>Total</b>	<b>2136</b>	<b>N/A</b>	<b>5</b>

Volumes have remained fairly static since last year, with only 87 more requests being received in total. It is pleasing to note that only 1.05% of all FOI requests generated a statutory internal review and that that 97.4% of all information requests (FOI & SAR) were responded to within the statutory timeframe. Of the 2136 instances referred in the above table only five (<0.1%) were escalated to the ICO; these were two voluntarily reported information incidents in consultation with the SIRO and the DPO and three were challenges to internal reviews issued by the Council. None of these generated any decision notice or financial penalty from the ICO.

Please see **appendix 2** for a summary of annual performance for 2022-2023 and against previous years. It is pleasing to report that overall performance compared to last year has increased by 3% (94.4%) and is now back in line with the performance levels of previous years; indicating that remedial measures put in place have been successful.

**Table 2.0 – Analysis of FOI Requests and DPA requests**

<b>Exemption/Exception - top three applied - FOI</b>	<b>No. received</b>	<b>% based on total received</b>
Section 21 - Data already published	117 	9.5
Section 43 - Commercial interests	22 	1.8
Section 31 – Law Enforcement	15 	1.2
<b>Service Area – top three volumes received - FOI</b>	<b>No.</b>	<b>%</b>
City Environment	312 	25
Finance	177 	14
Governance	116 	9
<b>Service Area – top three volumes received - SAR</b>	<b>No.</b>	<b>%</b>
Children’s Services	66 	27
Adult Services	48 	20
City Assets and Housing (All for W’Ton Homes)	36 	15
<b>Service Area – top three volumes received - Disclosures</b>	<b>No.</b>	<b>%</b>
City Environment	239 	42
Finance	197 	34
Education and Skills	72 	13
<b>Requestor Type – top three - All</b>	<b>No.</b>	<b>%</b>
Public	1416 	69.5
Organisations	338 	16.5
Media	160 	7.8

The arrows in the above shows the direction of travel in comparison to last year:

The same top three exemption types were applied this year. Likewise, excluding Governance, the same directorates featured in the top three for the different disclosure types.

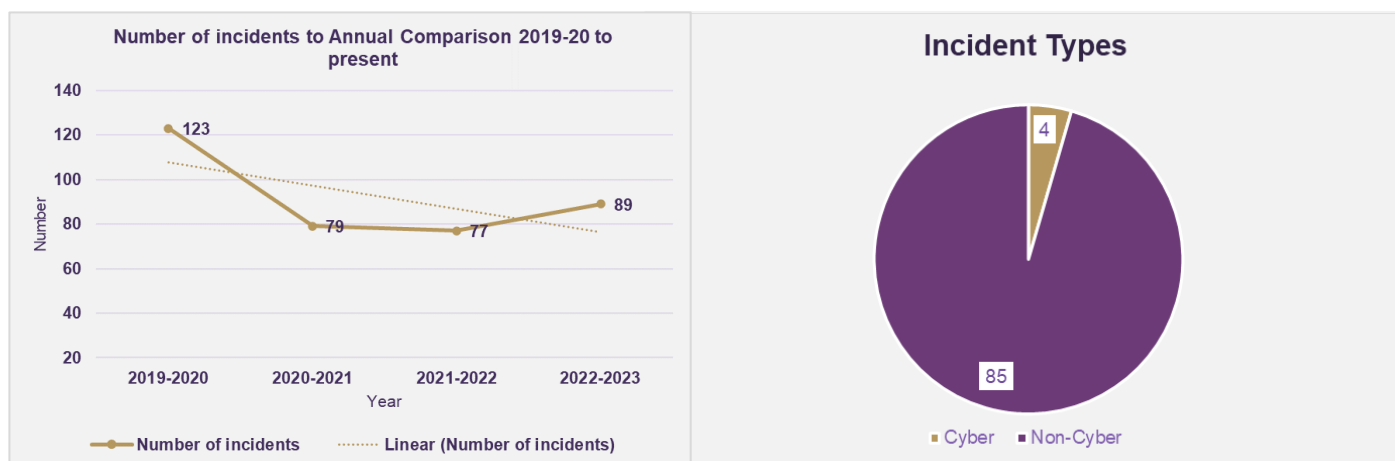
Currently 9.5% of all incoming FOI requests have been answered as the information requested is already available; this is an increase from last year’s figure of 7.9%. If more information is made available on-line, then the Council will be able to refer requests to these data sets as opposed to processing requests through teams and service areas. With a few years of data available now to analyse, it is apparent from the previous year comparisons that most of the

requests are made to the same directorates; future work should therefore focus on these top three directorates to identify what datasets could be proactively published. This can be picked up in the collaborative working between Information Governance and Data Analytics, which has already begun for the year, to identify if there are recurring themes within the top three directorates receiving the bulk of requests and to determine the feasibility of making additional data sets available to the public.

As per previous years, and as expected, most SAR requests (these are personal data requests) are made to the Adults and Children’s services – the majority being individuals wanting access to their historic social care files. These are the most voluminous and complex of personal data requests received, and the most commonly applied exemptions are third party information and legal privilege. Requests for information made by third parties are usually in relation to CCTV footage from insurance companies and individuals, along with address checks requested by the Police.

The public continue to make the most requests for information with 68.5% of requests being made by them last year. However, this is limited by the information provided to us and recorded on our case management system, hence if a requestor, even if they work for a media company, submits a request as an individual, it will be classed as a public request.

## Breach Management



Please see below for a summary on all Incidents and Incident types reported within the financial year and across the last four financial years.

The overall number of incidents for 2022-2023 (89) is slightly higher than the previous year 2021-2022 (77). As in previous years the main issue remains communications (physical and email) being sent to the wrong recipient, this error accounts for 84% of all breaches reported.

Whilst this risk can never be eliminated due to human error, mitigating actions continually take place to reduce this – such as targeted training, raising awareness and follow up action through incident reporting feedback. In addition, actual or potential incidents, whether isolated or a perceived theme, continue to be reported and discussed at individual Leadership team meetings, to identify learns and put in place any necessary action.

On review of the two cases that were voluntary reported to the ICO, one revolved around an inappropriate disclosure being made due to a failure in process and the other was a failure to use the BCC (Blind Carbon Copy) function as opposed to CC (Carbon Copy) function – a similar

breach reported to the ICO in a previous year. Neither of these generated any decision notice or financial penalty from the ICO.

### Third Party Breaches

Interestingly this year, two of our suppliers have reported cyber-attacks, with both suppliers reporting the incidents to the ICO directly. In both incidents, Council data has not been affected in terms of individual's data being compromised and/or the individual being placed at risk.

### Associated Risks and Considerations in relation to statutory and regulatory activities

The overall performance on FOI and SAR/DP requests for 2022-2023 has increased from 94.4% to 97.4%, indicating that the remedial actions (additional resource) put in place has had the desired positive effect on performance for the year.

It is worth noting that a new complaints case management system was procured at the end of quarter four of this year and will be implemented in late Summer. In preparation for this, as of April 2023, all case officers have been undertaking both the transactional complaints work as well as the transactional information governance work and will be involved in the testing and implementation of the system. As a result, performance will be closely monitored to ensure that there is minimal impact on performance during this transitional period on both statutory information requests and statutory complaints.

## Compliance Actions

For 2022-2023 the Council undertook the following compliance actions:

Standard/Compliance	Comments and Actions
<b>Data Security and Protection Toolkit (DSPT)</b>	This was successfully submitted before the annual deadline of 30 June 2023. No areas of concern were raised or reported for this submission.
<b>Cyber Essentials Plus</b>	This area of work is undertaken by Digital and IT but does feed into DSPT. Cyber Essentials Plus accreditation was achieved in July 2020 and was renewed in December 2022. Recertification is due in December 2023.
<b>Public Services Network (PSN)</b>	This area of work is undertaken by Digital and IT but directly feeds into the DSPT. This was successfully passed in February 2021 and was renewed in March 2023. Recertification is due from 1 March 2024
<b>LEXCEL</b>	The IG team assisted with Legal Services to ensure ongoing compliance with GDPR for their annual accreditation with LEXCEL.

## IG Work Undertaken in 2022-2023

In addition to the transactional work of FOI/EIR, SAR and breach reporting referred to above, the IG team are involved in multiple strategic groups/projects as set out below. By engaging IG at the outset, we can ensure that IG is embedded initially rather than as an afterthought at the end of a project. These safeguard the Council in relation to any adverse Information Governance repercussions, which demonstrates the councils ongoing commitment to privacy by design.

### Leadership Working

Leadership working continues with each leadership team having a dedicated strategic information governance lead responsible for supporting the area on all matters of IG.

This way of working will continue and will be fine-tuned for further efficiencies and effectiveness throughout the forthcoming year to ensure best practice and to achieve compliance across all service areas. Reset and refocus sessions have already been planned with leadership teams for the end of year/early quarter one of 2022-23, with the aim being to review priorities, identify any gaps in compliance and to reset individual IG work programmes with each area.

### Key successes

- Ongoing support on complex cross-cutting type projects across the business - early IG engagement has resulted in good privacy by design which has allowed for data quality and retention management being built into the system in the initial stages, thus reducing the need for any costly reactive and duplicated activities.
- Continued membership of Children and Adult's Transformation Boards – this gives IG strategic insight to road maps and forward planning activities so that IG roadmaps and strategies can be aligned accordingly.
- Collaborative working both Data and Analytics – the benefits of working together have been evidenced from both sides – early engagement and consultation leading to early consideration of IG impact and reduction of risk; development of dashboards to support the team's internal statutory processes.

### Next Steps

- Revive working relationships with other services – such as Legal and Procurement; have more sight of their strategic road maps so that we can forward plan accordingly.
- Expand our membership to other transformation boards or similar across the wider business, particularly those outside of the Children and Families arena.

### Information Governance Board

Half yearly progress updates continue to be presented to the Information Governance Board (IGB) since it transitioned from a standalone meeting to being part of the Council's Strategic SEB function two years earlier. Where adhoc reports or requests for a decision/approval need to be presented to the IG progress reports, these are scheduled as and when required during the year. For this reporting period, there were no decisions or approvals presented to the Board.

### Project Contribution and Support

The following provides a list of the key priority projects/initiatives where IG input was required to support the Council corporately, at Leadership level and at citywide multi-agency groups:

- Collaborative working with Digital & IT - to review cyber risks and technical measures put in place to protect personal and other sensitive information

- Draft Acceptable Use and Bring Your Own Device (BYOD) policies as part of Digital and IT's cyber security action plan
- Advice and support on revisions to the Council's social media policy
- Advice and support in respect of the use of Google Analytics 4 (GA4)
- Advice and support for Omnichannel – multi-channel contact centre software replacement project
- Collaborative working with Data & Analytics– increased collaborative work has taken place this year, both on internal initiatives and external. It is anticipated this will continue with strategic objectives being aligned for more effective joined up working and benefit to the business.
- Youth Unemployment 18-24 – attendance and contribution to both the working meetings with DWP and the Project Board; provide IG support particularly on the legal basis for processing data for the purposes of the project and information sharing with DWP partners. Providing IG support on the delivery of the City Ideas fund linked to this programme
- Eclipse Adults Project continued IG support both at operational and strategic group level through to go live.
- Support on governance issues around the use of innovative technology to support Adult health and social care out in the community using “Internet of Things” devices
- Working with Education on the creation of a City-wide Information Sharing Agreement for all schools in the borough and the City Council
- Working with the Families theme on the creation of Family Hubs within the City
- Provide support on the Reducing Repeat Referrals programme within Children Services
- Assisting Supporting Families and data sharing across the Council and with its partners
- Offering IG support to the Holiday Activities Fund
- IG Assistance to the Low Income Family Tracker (LIFT) project
- IG Support and stakeholder contribution to Traded Services programme board.
- Advice and support to Rent with Confidence re-launch project and website
- Advice and support as part of the development of the new Employee Risk Alert System that is replacing the Potentially Violent Persons Register (PVPR)
- Lexcel assisting Legal to maintain accreditation
- Advice on PBSS (DBS) checks to enable continued access to DWP data
- Advice and support to Council Tax in respect of the Government's Energy Bill Support Scheme
- Scanning Project –continued support on operational initiatives to ensure compliance with legal admissibility standards
- Collaborative working with our local and regional health partners - Participation in the Place Based Partnership (PBP) One Wolverhampton Governance and Informatics group and the Black Country and West Birmingham IG group (Shared Care Record).
- IG Support on implementation of health monitors in CWC libraries
- IG support on and contribution to the mid and long term objectives of the Housing strategy, delivered in partnership with the Council and Wolverhampton Homes.
- Respond to specific requests for support in relation to information governance queries such as Data Protection Impact Assessments; Information Sharing Agreements; Information incidents and Records Management

In addition to the projects that the Information Governance team support and contribute to, IG is also represented at the Council's Project Assurance Group (PAG) to ensure that all projects and programmes that come through the group, which are undertaken by the Council, are assessed for information governance related risks and issues at initiation stage.

## Training

It is a requirement of the Data Security and Protection Toolkit (DSPT) and the ICO that mandatory training is undertaken by all members of staff who deal with personal data and that a target take-up of 95% or more is achieved across the Council at any one time.

To effectively manage this, a training dashboard has been developed with colleagues from Data and Analytics which provides for a more accurate, robust and less manual means of monitoring the take up of mandatory information governance training than in previous years. The dashboard has been implemented by the team and is being used currently in pilot to report on individual leadership areas. Going forward, once finalised, the dashboard can be provided to Heads of Services and Managers to directly access and monitor their individual area/team progress. This tool will enable them to ensure the compliance target level is consistent throughout the year.

A new role-based IG training strategy was approved last year, and work has initiated on this. Modules have been reviewed and finalised for all levels and once a suitable monitoring process has been agreed and put in place, this new training framework can be implemented.

In addition to the above, the team have also continued to provide targeted training to service areas as and when required, including the delivery of a training seminar to the Legal supported the Councillor induction programme by running face to face IG training sessions; provided both classroom and virtual IG training sessions for schools who have bought in to our IG traded.

## Information Governance Framework

### Policy

In accordance with the IG Work plan of the previous year, a review was undertaken of the current information governance policies and framework. The review identified that a complete ratification of policies was required, and this was successfully undertaken in January 2021 with 19 very detailed policies being replaced by five high level policy documents. In addition, a new tiered policy framework was identified and developed.

The five new policies have been in place now for 18 months and will soon be due for their first review in February 2024. In addition, 22 out of the 26 level two procedure documents that provide detailed, specific, thematic, and more technical guidance to employees, and which underpin the new policies, were published on the council intranet for all employees to access. The four remaining procedure documents that are outstanding are linked to key pieces of work being developed with Digital and IT and will be progressed and published in the next year.

### Templates/privacy notices/forms – completed and pipeline

- Data Protection Impact Assessments (DPIAs) – we continue to support the business on the completion of DPIAs and shorter IG Impact Assessments. Screening continues to take place through the “starting a procurement” process which ensures that privacy by design and information risks are considered from the outset. A review of the process will be scheduled as part of the IG work programme, to ensure that the process remains current and fit for purpose.
- As part of the IG work plan for 2023-2024 the Council’s overarching privacy notice will be reviewed and updated for any legislative and operational changes.



- IG intranet – basic information such as team structure, key templates and policies have been published on the Information Governance section of the Governance portal/intranet. This is an interim position and work has re-started on creating a specific IG intranet page for employees to use.
- A dashboard is being developed for the monitoring of data breaches; this includes the creation of an electronic form that employees can use when reporting an information incident/data breach which will link directly to the dashboard and thus reducing manual input. Both the form and dashboard are currently being tested and it is anticipated these will go live in the year.
- A review of the city's MASH information sharing agreement has commenced. In addition, a review of the citywide three-tier Information Sharing Framework (lead by the Council) has also started and a proposal on approach will be present to the IG Board at a future date.

### **Information Governance – Traded Service**

The IG team offer a traded service to schools and Wolverhampton Homes, in addition to supporting colleagues in the West Midland Pension Fund (WMPF).

For the financial year of 2022-2023, the Information Governance team continued to support a number of schools on various information governance offerings. The SLA continues to provide schools with exceptional value for money in terms of the offerings available and the level of knowledge and experience the team provides. The working model is the same as the model with leadership teams, in that each school benefits from having a dedicated lead and deputy from the IG team who can provide a tailored service with direct access to support.

This traded service is reviewed annually, both financially and operationally, and work continues with the Schools Business and Support Service in terms of developing future combined SLA offerings with other services across the council and providing basic statutory support for LA lead schools.

Our traded service to Wolverhampton Homes (WH) continued with the team providing IG support on strategic elements such as DPIAs, Information Sharing Agreements and Data Processing Agreements, in addition to the transactional processing of WH freedom of information requests, SAR requests, third party disclosures and the management of WH information incidents.

### **Day to Day work**

We continue to provide advice and guidance on an ad hoc basis, review DPIAs, sharing agreements, data processing agreements, contracts, GDPR supplier self-assessments, and privacy notices (list not exhaustive), as and when required.


## Information Governance Risks 2022-2023

The following risks have been scored with the following matrix that is used across the Council for risk management as well as for scoring of breaches.

Due to the implications of non-compliance such as potential financial penalties, regulatory activity and reputational damage, the Council considers there to be sufficient risk around Information Governance that warrants regular monitoring and reporting through the Council's Strategic Risk Register.

As of July 2023, the following entry exists for information governance based around operational and technical measures. The entry is closely monitored each quarter with the council's Internal Audit team and is currently scored as Amber 6.

The below table is a snippet of the entry in Strategic Risk Register for July 2023:

10	<p><b>Information Governance</b> If the Council does not put in place appropriate policies, procedures and technologies to ensure the handling and protection of its data is undertaken in a secure manner and consistent with relevant legislation then it may be subject to regulatory action, financial penalties, reputational damage and the loss of confidential information.</p> <p><b>Risk Owner: David Pattison</b> <b>Cabinet Member: Cllr P Brookfield</b></p>	Our Council	6 Amber	6 Amber Target 4 Green		<p>Work on the IG Policy Framework has progressed - 26 internal procedure and guidance documents that underpin the policies have been written and are live for employees to access. Mandatory training levels are being monitored; a new dashboard has been produced with support from Data &amp; Analytics which will produce up to date statistics both on an adhoc basis and at individual Leadership teams in their scheduled quarterly update meetings. In addition, a new Data Breach management dashboard has also been developed and will be used from April 2023. This will provide more trend and targeted reporting of breaches. Collaborative working between IG and Digital and IT continues; a series of system demos have been viewed to support Cyber awareness raising across the council. Work continues cyber risk and compliance. Incidents reported during the period have been contained, investigated with mitigating actions put in place locally with relevant teams.</p> <p><b>Further actions to mitigate risk:</b></p> <ul style="list-style-type: none"> <li>Continue to collaborate with Digital and IT to progress the implementation of the remaining level two procedures and guidance documents – a reset of meetings is being scheduled in July to align road maps and joint priorities for 23/24</li> </ul>	<p>E-learning take up and ongoing training development</p> <p>Privacy by design – DPIA, IG Impact Assessments</p> <p>Quarterly updates and regular touch points with Leadership teams</p> <p>Robust breach management procedures in place with assessment and monitoring at service level (leadership feedback)</p> <p>SEB/IG Board and Caldicott function to continue to monitor, challenge, support and champion IG compliance initiatives</p> <p>A detailed annual report on Information Governance was taken to the Council's Governance and Ethics Committee in September 2023.</p>
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Risk Ref	Risk title and description		Previous Risk Score	Current Risk and Target Score	Direction of Travel	Update position and further actions to take to mitigate risks	Sources of Assurance
Page 395						<ul style="list-style-type: none"> <li>Robustly monitor the mandatory training levels via new dashboard to ensure above 95% take up in any given period. Further discussion arranged with OD to finalise and rollout of Level 2 and level 3 training for specialist roles</li> <li>Progress collaborative working; formulate and agree combined deliverables alignment with strategic roadmaps, particularly around the digital arena in relation to data and records management - Reset scheduled in July with Digital and IT; in addition, an element of records management will be picked up in the audit review scope too</li> <li>Progress the collaboration with Audit Services to support the DPO reporting function and ongoing corporate compliance assurance – as at June 23 - work has been scoped with Audit and timeframes will be confirmed</li> </ul>	

## IG Work Plan 2023-2024

Table 3.0 below highlights the key priorities from the full IG work plan for 2023-2024.

**Table 3.0 Summary workplan 2023-2024**

Priority work activities	Period 2023-2024	
Corporate IG Awareness Raising	Formulate a rolling Corporate communication and awareness plan to provide continuous updates to staff on key matters of IG throughout the year. To include: <ul style="list-style-type: none"> <li>• routine updates on the IG climate (national and local themes) in relation to data protection, Freedom of Information, and information incidents etc. along with any required learning</li> <li>• key updates on activities/incidents within the cyber- security environment, closely linking in with Digital &amp; IT's new cyber action plan</li> </ul>	Quarter 2 – Quarter 4
Information Asset Registers	A comprehensive review of the methodology in maintaining and operating these registers will be undertaken to ensure that they remain compliant with the latest legislation while still being useful and relevant for service areas. This will involve going back to basics to identify the most core and statutory data sets required and the best methodology for updating, collecting and monitoring these registers.	All year
Supply chain – Due Diligence with Data Processors	<ul style="list-style-type: none"> <li>• Review current internal processes around use of data processors/suppliers</li> <li>• Work collaboratively with Procurement and Legal to ensure processes and template agreements are rigorous and fit for challenge from the ICO</li> <li>• Present any radical changes to IG Board for approval</li> <li>• Communicate and implement the changes accordingly</li> </ul>	Quarter 3 to Quarter 1 2024-2025

Priority work activities		Period 2023-2024
Policies	Develop and publish the outstanding ICT level two policies in relation to Cyber and Acceptable Use as well as Social Media policies.	Quarter 2 to Quarter 3
IG intranet	Further develop the IG intranet pages into a standalone repository for all IG related guidance and policies for the whole Council. This will incorporate IG and Customer Engagement as well appropriate dashboards as required.	All year
Information Sharing	<ul style="list-style-type: none"> <li>• To finalise the review of: <ul style="list-style-type: none"> <li>○ MASH information sharing agreement</li> </ul> </li> <li>• Wolverhampton Information Sharing Framework <ul style="list-style-type: none"> <li>○ Undertake a comprehensive review of the current city-wide framework</li> <li>○ Present findings and proposals of any changes to IG Board for approval</li> <li>○ Develop/update/create and new information sharing templates in accordance with findings (including the Wolverhampton Overarching Information Sharing Protocol (tier 1), tier 2 and tier 3 sharing templates</li> <li>○ Finalise the School Information Sharing Agreement (<b>Issued April 2023</b>)</li> <li>○ Continue working with Health partner to finalise any national and regional health ISAs</li> </ul> </li> <li>• Create and update a CWC repository for all sharing agreements that are entered into</li> </ul>	Quarter 2 to Quarter 4
Traded Services	<ul style="list-style-type: none"> <li>• Continued service provisions</li> <li>• Review of SLAs with WH; review CWC and TMO relationship (IG)</li> <li>• Review of SLA provision for schools in light of financial situation and risk on future income</li> </ul>	All year Quarter 3
Housing Strategy	Collaborate with WH, TMO, CWC Housing with the implementation of the Housing Strategy Action Plan (2023 – 2028)	All year

Priority work activities		Period 2023-2024
Collaborative working	Further develop collaborative working programmes with Data & Analytics, Digital and IT, Operational Development aligning road maps and strategies	All year

## A glossary of terms

### Assurance

A confident assertion, based on sufficient, relevant and reliable evidence, that something is satisfactory, with the aim of giving comfort to the recipient. The basis of the assurance will be set out and it may be qualified if full comfort cannot be given.

### COPI (Control of Patient Information) Notice

The Secretary of State for Health and Social Care has issued NHS Digital with a Notice under Regulation 3(4) of the Health Service (Control of Patient Information) Regulations 2002 (COPI) to require NHS Digital to share confidential patient information with organisations entitled to process this under COPI for COVID-19 purposes.

### DPO

Data Protection Officer is a statutory role as mandated by the UK General Data Protection Regulations and the Data Protection Act 2018. All organisations who process personal/sensitive data must have this role in place to oversee an organisation's data protection strategy and implementation. They are the officer that ensures that an organization is complying with data protection requirements.

### DSPT

The Data Security and Protection Toolkit is an online self-assessment tool that allows organisations to measure their performance against the National Data Guardian's 10 data security standards. All organisations that have access to NHS patient data and systems must use this toolkit to provide assurance that they are practising good data security and that personal information is handled correctly.

### Governance

The arrangements in place to ensure that the Council fulfils its overall purpose, achieves its intended outcomes for citizens and service users and operates in an economical, effective, efficient and ethical manner.

### ICO

The Information Commissioner Office, the supervisory authority responsible for overseeing Data Protection and Freedom of Information in the UK.

### IGB

The governance group charged with carrying out assurance work and implementing and monitoring IG controls across the organisation.

### Risk Management

A logical and systematic method of establishing the context, identifying, analysing, evaluating, treating, monitoring and communicating the risks associated with any activity, function or process in a way that will enable the organisation to minimise losses and maximise opportunities.

### SIRO

The Senior Information Risk Owner is a member of the Senior Executive Board with overall responsibility for an organisation's information risk policy. The SIRO is accountable and responsible for information risk across the organisation.

SEB  
The Councils Senior Management Board.



Appendix 2

Information Governance Annual Statistics Info-graph 2022-2023

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