

Revised proposals for new Parliamentary constituency boundaries in the **London** region



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Summary

Who we are and what we do – ‘The 2023 Review’¹

The Boundary Commission for England (BCE) is an independent and impartial non-departmental public body, which is responsible for periodically reviewing Parliamentary constituency boundaries in England.

We are currently conducting a review on the basis of legal rules most recently updated by Parliament in 2020, which will conclude with a final report and recommendations from us by 1 July 2023. The rules require there to still be 650 constituencies across the UK, but more equally distributed across the four parts of the UK, which will see the number of constituencies in England increase to 543. Each (apart from five ‘protected’ constituencies) must also contain a number of electors that is no smaller than 69,724 and no larger than 77,062 (as at the fixed date of 2 March 2020).

We published our initial proposals for the new Parliamentary constituency boundaries in England on 8 June 2021 and there have been two rounds of statutory consultation relating to those to which we received over 45,000 responses. We have considered all of the comments received and taken them into account in developing our revised proposals, which we are now publishing for final consultation. For each region, a full report sets out a summary of the responses received to previous consultation on our initial proposals, our analysis of those, and the conclusions we have reached as to how the proposals should be revised as a result. The Appendix to each report contains details of the composition of each constituency we are now proposing, and maps to illustrate these can be viewed on our website or in hard copy at a local place of deposit.²

What are the revised proposals for the London region?

We have revised the composition of 43 of the 75 constituencies we proposed in June 2021, and maintained our initial proposals for the remainder. We have revised the name of 32 of our initially proposed constituencies. Our revised proposals would leave three existing constituencies in the London region wholly unchanged, and seven unchanged except to realign constituency boundaries with local government ward boundaries.³

As it is not always possible to allocate whole numbers of constituencies to individual London boroughs, we sometimes group these into sub-regions, meaning some constituencies cross borough boundaries. After consideration of the responses to the sub-regions in our initial proposals, our revised proposals are based on amended sub-regions, as follows: North East London⁴ (allocated nine constituencies); Newham and Tower Hamlets (allocated five constituencies); North Central London⁵

¹ Further details about the BCE and 2023 Review are published on our website: <https://boundarycommissionforengland.independent.gov.uk/>

² A list of places of deposit is published on our website (as above).

³ Where the Order to make such wards was made by 1 December 2020.

⁴ Barking and Dagenham, Havering, Redbridge, and Waltham Forest.

⁵ Barnet, Camden, Enfield, Hackney, Haringey, and Islington.

(allocated 14 constituencies); North West London⁶ (allocated 18 constituencies); South West London⁷ (allocated nine constituencies); South Central London⁸ (allocated 12 constituencies); and South East London⁹ (allocated eight constituencies). 27 constituencies would cross London borough boundaries (four fewer than our initial proposals); none would contain parts of more than two London boroughs.

In North East London, we propose to split three wards in the borough of Havering, rather than one as in the initial proposals. We propose no revisions to any of the five initially proposed constituencies in the Newham and Tower Hamlets sub-region. We have divided our North Central and North West London sub-region into two smaller sub-regions, respecting the A5 road as a geographical boundary. As a result, the number of borough boundary crossings in these parts of London would reduce from 18 in the initial proposals to 14. We propose some substantial revisions to constituencies in the boroughs of Barnet, Brent, Camden, the City of London, Enfield, Haringey, Kensington and Chelsea, and Westminster, in particular. Our revisions would allow one further existing constituency – Islington North – to remain wholly unchanged.

We have revised the composition of all 16 initially proposed constituencies in the boroughs of Croydon, Kingston upon Thames, Lambeth, Lewisham, Merton, Richmond upon Thames (south), and Southwark. We have retained the initial proposals for Sutton and Wandsworth. We propose one ward split in the borough of Croydon, although in a different ward to that proposed initially. In South East London, we have revised the composition of two of the initially proposed constituencies in the borough of Bromley, and split a ward in the south of the borough.

How to have your say

We are consulting on our revised proposals for a four-week period, from 8 November 2022 to 5 December 2022. We encourage everyone to use this final opportunity to contribute to the design of the new constituencies – the more views we hear, the more informed our decisions will be when we make our final recommendations and report to Parliament. Our consultation portal at www.bcereviews.org.uk has more information about our revised proposals and how to give us your views. You can also follow us on Twitter [@BCEReviews](https://twitter.com/BCEReviews) or at facebook.com/BCEReviews.

⁶ Brent, the City of London, Ealing, Hammersmith and Fulham, Harrow, Hillingdon, Hounslow, Kensington and Chelsea, Richmond upon Thames (north of the River Thames), and Westminster.

⁷ Kingston upon Thames, Merton, Richmond upon Thames (south of the River Thames), Sutton, and Wandsworth.

⁸ Croydon, Lambeth, Lewisham, and Southwark.

⁹ Bexley, Bromley, and Greenwich.

1 What is the Boundary Commission for England?

- 1.1 As already mentioned, BCE is an independent and impartial non-departmental public body, which is required to review Parliamentary constituency boundaries in England. We must conduct a review of all the constituencies in England every eight years. Our role is to make recommendations for new constituency boundaries, which are then made by Statutory Instrument and used at the next General Election.
- 1.2 The Chair of the Commission is the Speaker of the House of Commons, but – as an MP themselves – by convention they do not actively participate in the work of the Commission. The Deputy Chair and two further Commissioners determine its policies within the legislative framework, oversee the progression of a Review, and take decisions on the actual proposals and recommendations for new constituency boundaries. Further information about the Commissioners can be found on our regular website.

You can find further information on our regular website at www.boundarycommissionforengland.independent.gov.uk, or on our consultation portal at www.bcereviews.org.uk. You can also contact us with any general enquiries by emailing information@boundarycommissionengland.gov.uk, or by calling 020 7276 1102.

2 Background to the 2023 Review

- 2.1 We are currently conducting a review of Parliamentary constituency boundaries on the basis of rules most recently updated by Parliament in 2020.¹⁰ These rules require us to make the number of electors in each constituency more equal. This report covers only the work of the Boundary Commission for England (there are separate Commissions for Northern Ireland, Scotland, and Wales) and, in particular, introduces our revised proposals for London.
- 2.2 Parliamentary boundaries are important, as they define the area in which voters will elect a Member of Parliament. When our recommendations are accepted, they are then used for the first time at the next General Election following their acceptance.
- 2.3 The legislation states that there will be 650 Parliamentary constituencies covering the UK – the same as the current number, but a statutory formula now distributes that total proportionately across the four parts of the UK. England has therefore been allocated 543 constituencies for the 2023 Review, ten more than there are currently. There are also other rules that the Commission has regard to when conducting the review – a full set of the rules can be found in our Guide to the 2023 Review,¹¹ but they are also summarised later in this chapter. Most significantly, the rules require every constituency we recommend to contain no fewer than 69,724 electors and no more than 77,062.
- 2.4 This is a significant change to the old rules under which Parliamentary boundary reviews took place, in which achieving as close to the average number of electors in each constituency was an aim, but there was no statutory fixed minimum and maximum number of electors. This, together with the passage of time since constituencies were last updated (based on data from 2000), means that in England, existing constituencies currently range from 53,210 to 109,246 electors. Achieving a more even distribution of electors in every constituency across England, together with the increase in the total allocation of constituencies, means that a significant amount of change to the existing map of constituencies is inevitable.
- 2.5 When implemented, the final recommendations that we will make will be the first set of boundaries to be defined under the new rules. While there has to be a significant amount of change across the country, we have, where practicable, attempted to limit the extent of such change, having regard to the statutory factors and the need to create the best possible pattern for constituencies as a whole. Under the legislation, we have a challenging job in conducting a review of constituency boundaries that is necessarily going to result, in many places, in constituencies that are unfamiliar to the public. Nevertheless, we have conducted the review in a rigorous and thorough fashion.

¹⁰ The Parliamentary Constituencies Act 2020, available at www.legislation.gov.uk/ukpga/2020/25/contents

¹¹ Available at www.bcereviews.org.uk

- 2.6 The revised proposals that we set out in this report, and in the reports for the other eight regions across England, are made on the basis of the evidence we received during two consultation exercises relating to our initial proposals, the careful consideration of that evidence by the Secretariat and our Assistant Commissioners, and the best judgement of the three Commissioners. We are confident that these revised proposals strike the best balance between the statutory factors and, having consulted twice already, we are close to settling on a final pattern of constituencies to recommend to Parliament next year. There are areas across the country where our judgement has been a balanced and marginal one between competing alternatives, and in such cases we have made clear that we are particularly looking for further evidence before we finalise our recommendations. In many other areas we are persuaded by the evidence we have received thus far, and we would therefore require new and significantly stronger arguments to make us depart from our revised proposals. If it exists, such new and compelling evidence would be welcome, but we will not be assisted by a repetition of arguments that have already been made, and which we have already considered. The requirement to keep constituencies within the permitted range of electors is strict, but otherwise we have sought to balance often conflicting considerations. Our proposals must also be comprehensive. We are acutely aware that very often a change that may seem obvious to make in one constituency necessarily requires far less attractive alterations in one or more neighbouring constituencies, and sometimes the consequential alterations reverberate through a whole chain of constituencies.
- 2.7 Our Guide to the 2023 Review contains further detailed background information, and explains all of the policies and procedures that we are following in conducting the review. We encourage anyone wishing to respond to the review to read this document, which will give them a greater understanding of the rules and constraints placed on the Commission, especially if they are intending to comment on our revised proposals and/or make their own counter-proposals.

The rules in the legislation

- 2.8 As well as the primary rule that constituencies must have no fewer than 69,724 electors and no more than 77,062, the legislation also states that, when deciding on boundaries, the Commission may take into account:
- special geographical considerations, including in particular the size, shape and accessibility of a constituency;
 - local government boundaries which existed, or were prospective, on 1 December 2020;
 - boundaries of existing constituencies;
 - any local ties that would be broken by changes in constituencies; and
 - the inconveniences attendant on such changes.

- 2.9 In relation to local government boundaries in particular, it should be noted that for a given area, where we choose to take account of local government boundaries, if there are prospective boundaries (as at 1 December 2020), it is those, rather than existing boundaries, of which account may be taken. This is a significant change to the former legislation, which referred only to the local government boundaries as they actually existed on the relevant date.
- 2.10 Our initial proposals for London (and the accompanying maps) were therefore based on local government boundaries that existed, or – where relevant – were prospective, on 1 December 2020. Our revised proposals contained within this report continue to be based on those boundaries. Our Guide to the 2023 Review outlines further our policy on how, and to what extent, we take into account local government boundaries. We have used the existing and prospective wards as at 1 December 2020 of unitary authorities, and borough and district councils (in areas where there is also a county council) as the basic building blocks for our proposals.
- 2.11 In a number of existing constituencies, changes to local government wards since constituencies were last updated (in 2010) have resulted in the new ward effectively being split, between the constituency the old ward was wholly a part of, and at least one other existing constituency. As part of our proposals, we will by default seek to realign the boundaries of constituencies with up-to-date ward boundaries, thus reuniting wards that are currently divided between existing constituencies. In places where there has been only a minor change to a ward, this may see an existing constituency boundary change only very slightly, to realign with the new ward. However, where wards in an area have been changed more significantly, this may result in the area covered by the new ward becoming part of a different constituency than the one much of that area was in previously.
- 2.12 Although the 2023 Review of Parliamentary constituencies will inevitably result in significant change, we have also taken into account the boundaries of existing constituencies so far as we can. We tried to retain existing constituencies as part of our initial proposals wherever possible, as long as the other factors could also be satisfied. This, however, proved difficult. Our initial proposals retained 3% of the existing constituencies in London as wholly unchanged, and a further 13.7% changed only to realign with changed boundaries of their component wards.
- 2.13 Among the many arguments we heard in response to the consultations on our initial proposals was the need to have particular regard to this factor of the rules to which we work. While some respondents might put a higher value on retaining existing constituency boundaries over the other factors in the rules, the legislation does not give any of these precedence over another, and the Commission therefore considers that its task is to seek to strike the best balance of all the factors in each area, within the numerical constraints.

- 2.14 Our proposals are based on the nine English regions as defined in the legislation; a description of the extent of each region also appears in the Guide to the 2023 Review. This report relates to the London region. There are eight other separate reports containing our revised proposals for the other regions. At the very beginning of the 2023 Review we decided, in agreement with all the qualifying political parties, to use these regions as discrete areas within which to undertake our work. You can find more details in our Guide to the 2023 Review and on our website. We stated in our initial proposals report that, while this approach does not prevent anyone from making proposals to us that cross regional boundaries, very compelling reasons would need to be given to persuade us to depart from the region-based approach.
- 2.15 In response to the consultations on our initial proposals, we did not receive sufficient evidence across the country to suggest that we should depart from the regional approach to this review. Therefore, this report, and all other regional reports, continue to use the regional boundaries as the basis for proposals for constituencies.

Timetable for our review

Stage one – development of initial proposals

- 2.16 We began this review in January 2021. We published electorate data from 2 March 2020 (the relevant date specified by the legislation) for each local government ward in England, including – where relevant – wards that were prospective on 1 December 2020. The electorate data was provided by individual local electoral registration officers and the Office for National Statistics. These figures are available on our website. The Commission then considered the statutory factors outlined above and drew up the initial proposals. We published our initial proposals for consultation for each of England's nine regions on 8 June 2021.

Stage two – consultation on initial proposals

- 2.17 We consulted on our initial proposals for eight weeks, from 8 June 2021 until 2 August 2021. We received over 34,000 discrete written representations across the country as a whole, including over 6,200 unique written representations relating to London. We are grateful to all those who took the time and effort to read and respond to our initial proposals.

Stage three – consultation on representations received

- 2.18 The legislation required us to publish all the responses we received on our initial proposals. We published the representations on 7 February 2022 ahead of a six-week 'secondary consultation' period, which took place from 22 February 2022 until 4 April 2022. The purpose of the secondary consultation was for people to

see what others said in response to our initial proposals, and to make comments on those views, for example by countering an argument, or by supporting and reinforcing what others said. We received over 10,000 unique written representations across the country as a whole, including over 1,200 unique representations relating to London. We also hosted between two and five public hearings in each region. We heard more than 190 oral representations at the five public hearings in London. We are grateful to all those who attended and spoke at our public hearings.

Stage four – development and publication of revised proposals

- 2.19 As we detail in chapter 3 below, having considered the evidence presented to us, we have decided that the evidence is such that it is appropriate to revise our initial proposals in some areas. Therefore, as we are required to do under the legislation, on 8 November 2022, we are publishing this report – *Revised proposals for new constituency boundaries in the London region* – alongside eight others, one for each of the other regions in England. We are consulting on our revised proposals for the statutory four-week period, which closes on 5 December 2022. Unlike the secondary consultation period, there is no provision in the legislation for further public hearings. Chapter 4 outlines how you can contribute during this consultation period. It should be noted that this will be the final opportunity for people to contribute their views during the 2023 Review.

Stage five – development and publication of the final report and recommendations

- 2.20 Once the consultation on revised proposals has closed on 5 December 2022, we will consider all the representations received at this stage, and throughout the review, before determining our final recommendations. The recommendations will be set out in a report to the Speaker of the House of Commons, who will lay it before Parliament, at which time we will also publish the report. The legislation states that we should submit that report to the Speaker by 1 July 2023. Further details about what the Government must then do with our recommendations in order to implement them are contained in our Guide to the 2023 Review.
- 2.21 Throughout each consultation period, we have taken – and are continuing to take – all reasonable steps to publicise our proposals, so that as many people as possible are aware of the consultation and can take the opportunity to contribute to our review of constituencies.

3 Revised proposals for London

- 3.1 After the consultation on the initial proposals in 2021, we arranged for the appointment of 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 held in the region to collect oral evidence, as follows:
- 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
- 3.2 We asked the Assistant Commissioners to consider all the written and oral representations, and to make recommendations to us on whether our initial proposals should be revised, in light of evidence provided in the representations. It is important to stress that the Assistant Commissioners had no involvement in developing – and therefore no vested interest in supporting – our initial proposals. Accordingly, they came to the analysis with an independent mind, open to viable alternative proposals supported by evidence. We are very grateful for the thorough and methodical approach the Assistant Commissioners have taken to their work.
- 3.3 What follows in this chapter is:
- a brief recap of our initial proposals;
 - a description of the views and counter-proposals put forward during the consultations;
 - the Assistant Commissioners’ analysis of the strength of the arguments for adoption of any of those counter-proposals; and
 - our decision on whether or not to make changes to our proposals in the given area.
- 3.4 A tabular summary of the revised constituencies we now propose appears in the Appendix to this report.
- 3.5 Throughout the course of their analysis, the Assistant Commissioners felt that the relatively large proportion of local authorities in London that had new wards made by Order dated after the statutory cut-off date of 1 December 2020 made the creation of a pattern of constituencies that would make logical sense to electors at future Parliamentary elections particularly difficult in this region. We too are sympathetic to those representations that encouraged us to consider new ward boundaries made by Order after 1 December 2020, on the grounds of avoiding difficulties with electoral administration and minimising voter confusion, but we remind readers that under the rules of the legislation, we are statutorily obliged

to take into account local government boundaries as they existed (or were in prospect) on 1 December 2020. The only circumstance where we are therefore prepared to take into account ward boundaries introduced after 1 December 2020 is when we are considering splitting an older ward between constituencies.

- 3.6 Throughout this chapter, where we refer to a respondent's response, we do so by using the reference number, i.e. BCE-12345 (we only include an individual's name if they gave permission for it to be published). This reference number corresponds with the representations that can be found on our consultation website at www.bcereviews.org.uk. All representations received in response to the first two consultations are publicly available on this website. The representations received in response to these revised proposals will be published at the end of the review.

Sub-regions

- 3.7 In developing our initial proposals, we decided to divide London into five sub-regions. These were: (1) North East London; (2) Newham and Tower Hamlets; (3) North Central and North West London; (4) South Central and South West London; and (5) South East London. We retained the River Thames as a geographic boundary between constituencies to its north ('North London') and to its south ('South London').
- 3.8 In our initial proposals, we treated the North Central and North West areas as a single sub-region, since our investigations showed that treating the North 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 multiple ward splits. Similar reasoning applied to the combining of the South West and South Central areas into one sub-region.
- 3.9 Most of the counter-proposals we received supported the principle of maintaining the River Thames as a geographical boundary between North London and South London. The Liberal Democrats (BCE-80979, BCE-94859, BCE-97487) expressed some concern that this approach divides the borough of Richmond upon Thames between sub-regions, and, in our initial proposals, necessitated an orphan ward from Richmond upon Thames being included in a Hounslow-based constituency. The Liberal Democrats contended that the River Thames is 'not an especially strong barrier' in the borough of Richmond upon Thames, citing road, rail, and pedestrian crossing points, and noting that local services and community groups are organised cross-river (BCE-80979). However, they did not provide a specific counter-proposal, acknowledging that moving any Twickenham wards to a Richmond constituency over the river would 'inevitably split the Twickenham area' and would have significant knock-on consequences for the pattern of constituencies south of the river.

- 3.10** Lewis Baston (BCE-81615) proposed a constituency that would cross the River Thames at Richmond, providing two variations for its configuration. This counter-proposal drew attention to the numerical challenges posed in North Central and North West London, given the difference between the sub-region's mathematical constituency entitlement (32.66) and integer allocation (32), and contended that dispensing with the Thames as a hard boundary would enable much greater ease and flexibility in formulating constituencies across the rest of North London. Lewis Baston argued that this counter-proposal for North Central and North West London – including a constituency crossing the Thames – would better respect borough boundaries, and move fewer electors from their existing constituency, than our initial proposals. A counter-proposal from BCE-79433 also put forward a constituency that would cross the River Thames at Richmond, while Oliver Raven (BCE-85352) proposed two constituencies that would cross the Thames in the boroughs of Richmond upon Thames and Kingston upon Thames.
- 3.11** Our North East London sub-region and Newham and Tower Hamlets sub-region received almost unanimous support. A counter-proposal was provided by Adam Gray (BCE-61555) that would combine these two sub-regions into one larger East London sub-region, via a constituency that would cross the boundary between Redbridge and Newham boroughs.
- 3.12** While there was some support for our North Central and North West London sub-region, many of the counter-proposals submitted to us advocated the use of the A5 (Edgware Road) as a geographical dividing line, and consequently suggested that the North Central and North West sub-region should be broken down into two, three, or even four smaller sub-regions. Some respondents including Jonathan Stansby (BCE-67759 / BCE-89921) and BCE-63179 / BCE-88544 updated or replaced their initial counter-proposal to minimise the number of constituencies crossing the A5 road, following reflection on representations received during the initial consultation period.
- 3.13** The Liberal Democrats proposed that our North Central and North West sub-region should be divided into two smaller sub-regions, with the boroughs grouped as follows: (1) Barnet, Camden, Enfield, Hackney, Haringey, and Islington; and (2) Brent, the City of London, Ealing, Hammersmith and Fulham, Harrow, Hillingdon, Hounslow, Kensington and Chelsea, Richmond upon Thames (north), and Westminster. Our Assistant Commissioners noted that these were different groups of boroughs to the ones that had been initially explored in developing the initial proposals. The Liberal Democrats argued that their counter-proposal would better reflect the current pattern of constituencies, thereby minimising the moving of electors from their existing constituency, and would also better respect borough boundaries and community ties. The Labour Party (BCE-95656) supported the Liberal Democrats' counter-proposal. John Bryant's second counter-proposal (BCE-94748) put forward the same

grouping of boroughs as the Liberal Democrats. Having originally proposed that Barnet and Camden should be treated as a separate group to Enfield, Hackney, Haringey, and Islington (BCE-73747), John Bryant subsequently wrote, 'I am now persuaded of the merit of treating the area as a unit.'

- 3.14** The Conservative Party (BCE-86589, BCE-96881, BCE-97483) put forward three sub-regions for the North Central and North West area, grouping the boroughs as follows: (1) Barnet, Enfield, and Haringey; (2) Camden, Hackney, and Islington; and (3) Brent, the City of London, Ealing, Hammersmith and Fulham, Harrow, Hillingdon, Hounslow, Kensington and Chelsea, Richmond upon Thames (north), and Westminster. They emphasised that their counter-proposal 'imposes the A5 as a sub-regional boundary from Kilburn north to the Greater London boundary at Edgware. The A5 is a major dividing line which (apart from a small area around Welsh Harp) is used as a borough boundary throughout its length north of Kilburn. Since 1945 it has been a Parliamentary constituency boundary in London north of Kilburn' (BCE-86589). They also argued that their counter-proposal would be considerably more compliant with the statutory factors than our initial proposals.
- 3.15** Counter-proposals from Adam Gray (BCE-61555), Peter Whitehead (BCE-78064), and Jonathan Stansby (BCE-89921) divided our North Central and North West sub-region into four groups of boroughs: (1) Barnet and Camden; (2) Enfield, Hackney, Haringey, and Islington; (3) Brent, the City of London, Ealing, Harrow, Hillingdon, and Westminster; and (4) Hammersmith and Fulham, Hounslow, Kensington and Chelsea, and Richmond upon Thames (north). These respondents all argued that their counter-proposals would significantly reduce the number of constituencies crossing borough boundaries – and better maintain the existing pattern of constituencies – than in our initial proposals.
- 3.16** While recognising the community ties arguments for a constituency crossing the River Thames in the borough of Richmond upon Thames, the Assistant Commissioners considered that such an arrangement would result in disruption to existing constituencies in the neighbouring borough of Hounslow, and would cause difficulties in creating a coherent pattern of constituencies across South London. For example, the Assistant Commissioners noted that while Lewis Baston's counter-proposal would prevent an orphan ward in the borough of Richmond of Thames, it would consequently result in two orphan wards in the borough of Hounslow (one each in their proposed constituencies of Hampton and Teddington, and Southall) and the division of the existing Feltham and Heston constituency into four different constituencies. They considered that this counter-proposal would break community ties in Twickenham and Heston (north of the river) and would divide several communities south of the river.

- 3.17 The Assistant Commissioners considered that the counter-proposals from Oliver Raven and BCE-79433, which also presented constituencies crossing the River Thames, would result in some significant disruption to existing constituencies across large parts of North London and South London. They further noted that both of these counter-proposals included constituencies crossing the A5 road between the boroughs of Barnet and Harrow, Barnet and Brent, and Camden and Brent. The Assistant Commissioners concluded that all the counter-proposals that crossed the River Thames would not better meet the statutory factors than those counter-proposals which did not cross the Thames. They therefore recommended that we should not depart from our approach of using the River Thames as a logical, natural boundary between North London and South London, and we agree.
- 3.18 Given the overwhelming support for our North East London sub-region, and Newham and Tower Hamlets sub-region, the Assistant Commissioners did not recommend any changes to these sub-regional groupings. They assessed the counter-proposal provided by Adam Gray for a combined East London sub-region, but they did not consider that this approach would enable a pattern of constituencies better reflecting the statutory factors. We agree with the Assistant Commissioners' recommendation that the North East London and Newham and Tower Hamlets sub-regions should not be altered.
- 3.19 In light of the extensive evidence received across North Central and North West London, and the number of viable counter-proposals for this part of the region, the Assistant Commissioners recognised the merits of treating the A5 road as a significant geographical consideration for revising the initially proposed sub-region. They noted that many representations, even when not specifically commenting on sub-regional groupings, had objected to: 1) the crossing of the A5 road; 2) the division of the borough of Barnet into five constituencies (with only one wholly contained within the borough boundaries); and 3) the pairing of the City of London with Islington rather than Westminster. These were all issues that had ultimately stemmed from our decision to treat North Central and North West London together as one large sub-region, and were addressed in almost all of the counter-proposals.
- 3.20 The Assistant Commissioners noted a number of similarities between the Liberal Democrats and Conservative Party counter-proposals. They both proposed the same grouping of boroughs to the west of the A5, including Westminster and the City of London, and they both proposed a constituency crossing between the boroughs of Brent and Westminster. Despite the Conservative Party sub-dividing the six boroughs to the east of the A5 into two groups, rather than treating them as one group as the Liberal Democrats did, there were similarities in their approaches to constituencies in the boroughs of Barnet, Camden, and Haringey. John Bryant's counter-proposals also bore resemblance to those from the Liberal Democrats and the Conservative Party. The Assistant Commissioners noted

that the counter-proposal from the Conservative Party would reduce the number of constituencies crossing borough boundaries in North Central and North West London by five, from 18 in our initial proposals, to 13, while the Liberal Democrats' counter-proposal and John Bryant's second submission would reduce this number from 18 to 14.

- 3.21** When analysing the counter-proposals that divided our North Central and North West sub-region into four smaller groups of boroughs, the Assistant Commissioners also noted a number of similarities between them. They all proposed a very similar arrangement of constituencies in the boroughs of Barnet, Camden, Enfield, Hackney, Haringey, and Islington – which also bore resemblance to many aspects of the Liberal Democrats' counter-proposal. In line with the Liberal Democrats, the Conservative Party, and John Bryant, the counter-proposals from Adam Gray, Peter Whitehead, and Jonathan Stansby linked the City of London with Westminster, and proposed a cross-borough constituency between Westminster and Brent. However, while the Liberal Democrats and the Conservative Party supported the initial proposals for the western swathe of the sub-region – namely, the boroughs of Ealing, Hammersmith and Fulham, Harrow (except the eastern part of the borough), Hillingdon, Hounslow, and Richmond upon Thames (north) – the other respondents referenced above proposed a different pattern of constituencies across all or parts of this area. The Assistant Commissioners noted that the counter-proposals from Peter Whitehead and Jonathan Stansby would reduce the number of constituencies crossing borough boundaries in North Central and North West London from 18 to 12, while Adam Gray's counter-proposal would reduce the number from 18 to 13.
- 3.22** Following their analysis of representations and counter-proposals, which will be discussed in detail in the relevant sub-regional sections of this report, the Assistant Commissioners were persuaded that they should recommend a pattern of constituencies that would respect the A5 road as a dividing line. They 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. Having assessed the various groupings of boroughs presented to us, and the particular constituency arrangements that would flow from each, the Assistant Commissioners considered that dividing the North Central and North West sub-region into two smaller sub-regions, rather than three or four, would facilitate the construction of a pattern of constituencies best meeting the statutory factors overall. They therefore recommended a North Central London sub-region ('east' of the A5), comprising the boroughs of Barnet, Camden, Enfield, Hackney, Haringey, and Islington, and a North West London sub-region ('west' of the A5), comprising the boroughs of Brent, the City of London, Ealing, Hammersmith and Fulham, Harrow, Hillingdon, Hounslow, Kensington and

Chelsea, Richmond upon Thames (north), and Westminster. These sub-regions align with the groupings of boroughs proposed by the Liberal Democrats and John Bryant (second submission). Given the arguments that were presented to us, we agree with the Assistant Commissioners' recommendation.

- 3.23** In South London, our South Central and South West sub-region was largely opposed due to Longthornton ward from the borough of Merton (in the South West area) being included as an orphan ward in the Croydon North constituency (in the South Central area). While not commenting specifically on sub-regional groupings, hundreds of representations contended that Longthornton ward should remain in the Mitcham and Morden constituency. Most viable counter-proposals for South London presented a standalone South West sub-region. Having assessed the evidence and the counter-proposals, the Assistant Commissioners accordingly recommended that South West London, comprising the boroughs of Kingston upon Thames, Merton, Richmond upon Thames (south), Sutton, and Wandsworth, should be treated as a sub-region in its own right. We agree with their recommendation.
- 3.24** Regarding the areas of South Central and South East London, counter-proposals presented a variety of sub-regional approaches. The Labour Party (BCE-79496, BCE-95656, BCE-97485) and the Liberal Democrats (BCE-80979, BCE-94859, BCE-97487) supported the grouping of Bexley, Bromley, and Greenwich to form the South East sub-region. The Labour Party noted that with an entitlement to 7.96 constituencies, these three boroughs 'form a logical review area with an allocation of eight constituencies' (BCE-79496), also stating that the boroughs 'have longstanding administrative relationships and they form an identifiable segment of the city' (BCE-95656). The Labour Party and the Liberal Democrats consequently proposed a standalone South Central sub-region, comprising the boroughs of Croydon, Lambeth, Lewisham, and Southwark. Pete Challis (BCE-83681), however, contended that 'the decision by the Boundary Commission to create a separate South East London sub-region introduces some unnecessary limitations that have resulted in the Commission being unable to explore a wider set of proposals', and consequently put forward a combined South Central and South East sub-region.
- 3.25** The Conservative Party (BCE-86589, BCE-96881, BCE-97483) presented two sub-regions for South London: their South West sub-region would include Lambeth with the grouping of Kingston upon Thames, Merton, Richmond upon Thames (south), Sutton, and Wandsworth; and their South East sub-region accordingly would comprise the boroughs of Bexley, Bromley, Croydon, Greenwich, Lewisham, and Southwark. The Conservative Party argued that their counter-proposal would better reflect the statutory factors than our initial

proposals, in part because it would treat Lambeth as a coterminous borough (that is, with three constituencies contained wholly within the borough boundary). They contended that their arrangement for Lambeth had better regard to local authority boundaries, the boundaries of existing constituencies, and local ties.

- 3.26** John Bryant (BCE-73466) and John Cartwright (BCE-53975) also treated Lambeth as a coterminous borough in their counter-proposals. However, they then diverged from the Conservative Party's approach by putting forward two groupings of boroughs across the rest of South Central and South East London: (1) Greenwich, Lewisham, and Southwark; and (2) Bexley, Bromley, and Croydon. John Bryant argued that this counter-proposal would reduce the number of constituencies crossing borough boundaries in South London compared with our initial proposals, and would better reflect community ties in a number of areas.
- 3.27** Adam Gray's counter-proposal for South London (BCE-61555) was broadly based on a division into South East, South Central, and South West areas, but actually proposed constituencies that would cross between these three review areas, thereby effectively treating all of South London as one sub-region.
- 3.28** When analysing the counter-proposals received for the South Central and South East parts of London, the Assistant Commissioners observed a general pattern. Those counter-proposals that treated Lambeth as a coterminous borough (the Conservative Party, John Bryant, and John Cartwright) all consequently proposed a constituency crossing from Croydon to Bromley in the Crystal Palace area. Croydon is entitled to 3.46 constituencies, therefore a constituency crossing out of Croydon is necessary – and if pairings with Sutton, Merton, and Lambeth are deemed undesirable, then a pairing with Bromley remains the only option. On the other hand, those counter-proposals that did not treat Lambeth as a self-contained borough (the Labour Party, the Liberal Democrats, and Pete Challis) all proposed constituencies crossing between Lambeth and Southwark, and Lambeth and Croydon.
- 3.29** The Assistant Commissioners noted a number of similarities between the counter-proposals from John Bryant and John Cartwright: they proposed an identical pattern of constituencies across the boroughs of Southwark, Lewisham, Greenwich, and Bromley, and an almost identical arrangement for Lambeth and Bexley. The Assistant Commissioners recognised the merits of John Bryant's and John Cartwright's sub-regional approach, in that their counter-proposals would reduce the number of constituencies crossing borough boundaries across the whole of South London from eight, in our initial proposals, to six. The Assistant Commissioners considered, however, that these counter-proposals would cause significant disruption to the existing pattern of constituencies in the boroughs of Bexley and Greenwich, in particular.

- 3.30** When assessing the counter-proposals from the political parties, the Assistant Commissioners noted that the Liberal Democrats' counter-proposal (which was subsequently adopted and amended slightly by Jonathan Stansby in his second submission) would reduce the number of constituencies in South London crossing borough boundaries from eight to seven. Conversely, the counter-proposals from the Labour Party and the Conservative Party would increase this number from eight to nine – as would the counter-proposal from Pete Challis. The Assistant Commissioners did not deem the small differences in these numbers to be a deciding factor in their assessments, but did feel the approach put forward by Adam Gray, which would result in 13 cross-borough constituencies in South London, to be a sufficiently large increase as to represent a significant drawback.
- 3.31** The Assistant Commissioners saw considerable merit in the counter-proposals to have constituencies wholly aligned with Lambeth's boundaries, since this approach would clearly reflect the statutory factors very well for that borough. They also noted, however, that a large number of representations had opposed the prospective division in our initial proposals of the existing Dulwich and West Norwood constituency, which spans the boroughs of Lambeth and Southwark, with respondents citing close ties between communities straddling the borough boundary. The Assistant Commissioners further noted that a coterminous Lambeth appeared to be at the cost of undesirable knock-on consequences for constituencies in the boroughs of Southwark and Lewisham.
- 3.32** The Assistant Commissioners recognised the finely balanced arguments in the areas of South Central and South East London. Having considered the representations and detailed constituency compositions in the counter-proposals we received (discussed in detail later), the Assistant Commissioners were not persuaded that we should depart from the initially proposed stand-alone South East sub-region. They concluded that treating South Central and South East sub-regions separately, as per the Liberal Democrats and Labour Party counter-proposals, would enable an arrangement of constituencies that would better reflect the statutory factors across these areas as a whole. The Assistant Commissioners therefore recommended a South Central London sub-region, comprising the boroughs of Croydon, Lambeth, Lewisham, and Southwark, and a South East London sub-region as initially proposed, comprising the boroughs of Bexley, Bromley, and Greenwich. In light of the evidence presented to us, we agree with their recommendation.
- 3.33** In the next sections of our report, we consider each of our now proposed sub-regions in turn, summarising our initial proposals, followed by the responses and counter-proposals received. We then set out our Assistant Commissioners' consideration of the evidence and their recommendations, and our revised proposals on the basis of the evidence received and in accordance with the statutory rules for the 2023 Review.

North East London

- 3.34 There are currently nine constituencies in the North East London sub-region. Our initial proposals were also for nine constituencies. Four of the existing constituencies have electorates within the permitted electorate range, and our initial proposals retained the Walthamstow constituency wholly unchanged.
- 3.35 Our initial proposals for the North East sub-region were fully supported by the Labour Party (BCE-79496, BCE-95656, BCE-97485) and the Liberal Democrats (BCE-80979, BCE-94859, BCE-97487). The Conservative Party (BCE-86589, BCE-96881, BCE-97483) provided a counter-proposal that would follow the general pattern of our initial proposals, but with some amendments, which they argued would better reflect existing constituencies and local ties. Counter-proposals that diverged more significantly from our initial proposals were provided by Oliver Raven (BCE-85352) and BCE-79433. We also received smaller scale counter-proposals, focused on the three constituencies of Chingford and Woodford Green, Leyton and Wanstead, and Walthamstow, from Robert Cole on behalf of the South Woodford Ward Conservatives (BCE-79475) and BCE-55200.

Havering

- 3.36 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 consequently proposed splitting Hylands ward between the Hornchurch and Upminster, and Romford constituencies. The Conservative Party, the Labour Party, and the Liberal Democrats, alongside many other respondents, supported our rationale for splitting a ward in Havering. The Conservative Party wrote: 'We accept that to achieve a coherent pattern of constituencies a ward must be split in Havering. Without a ward split two constituencies entirely in Havering would both be at the lower end of quota making it more difficult to comply with Rule 2 elsewhere in the sub-region' (BCE-86589). The Labour Party contended that our proposed division of Hylands ward was 'justified' and that 'any alternative means of reducing the electorate of the Hornchurch & Upminster BC would certainly be much more disruptive' (BCE-79496).

- 3.37 We received very few comments from residents of Hylands ward, but we received almost 600 unique representations opposing our proposed transfer of Emerson Park ward. Opposition stemmed largely from the residents of Emerson Park itself, including two petitions opposing the transfer of the ward: 1) an online form of 598 signatures ('Keep Emerson Park in Hornchurch & Upminster') collected by Julia Lopez, MP for Hornchurch and Upminster (BCE-84512); and 2) an online form of 934 signatures ('STOP Emerson Park moving to Romford') collected by the Hornchurch and Upminster Conservative Association (BCE-85274).
- 3.38 Residents of Emerson Park argued that they consider themselves part of the Hornchurch community and look to Hornchurch for local amenities including shopping, restaurants, and cultural and community centres. Our initial proposals would therefore break local ties between Emerson Park and Hornchurch. Many respondents referred to strong links between schools in Emerson Park ward and schools in the towns of Hornchurch and Upminster. Several respondents also pointed out that two of the main roads running through Emerson Park ward, Ardleigh Green Road/Butts Green Road and Wingletye Lane, connect directly to Hornchurch High Street, and most of the ward is geographically closer to Hornchurch town centre than Romford town centre. Concern was expressed that the removal of Emerson Park ward from the Hornchurch and Upminster constituency would undermine the geographical cohesiveness of the constituency. Julia Lopez MP argued that Emerson Park ward 'lies at the centre of Hornchurch & Upminster and acts as the key geographical, road and residential link between its constituent parts' (BCE-84512), therefore if our initial proposals were to be implemented, the Hornchurch and Upminster constituency would be divided into 'two very separate entities connected only by a tract of farmland in the middle' (BCE-97594). Additionally, a number of respondents highlighted that transferring Emerson Park ward to the Romford constituency would divide the Harold Wood community, since part of Harold Wood lies in the northernmost part of Emerson Park ward: this part of Harold Wood would be transferred to the Romford constituency, while the rest of the community would remain in the Hornchurch and Upminster constituency.
- 3.39 Conversely, we also received notable support for our proposed transfer of Emerson Park ward, including over 150 representations, four postal petitions totalling 543 signatures (BCE-86188, BCE-86397, BCE-86398, BCE-86399), and submissions from Andrew Rosindell, MP for Romford (BCE-85341, BCE-96869, BCE-97621). Respondents argued that Emerson Park ward has strong community ties with its neighbouring Squirrel's Heath ward, part of the existing Romford constituency, and that Emerson Park is part of a continuous residential area extending from the east of Romford town centre through Gidea Park, Heath Park, and Ardleigh Green (all communities within the Romford constituency). Respondents gave examples of organisations in the Ardleigh Green area, such as churches, community centres, and a local residents' association, which also serve Emerson Park. Andrew Rosindell MP contended that transport links from

Emerson Park to Romford are 'direct' and that 'local people overwhelmingly travel in the direction of Romford' (BCE-85341) – although this argument was countered by Dominic Swan (BCE-97623) and Julia Lopez MP (BCE-92819), who noted that since Romford is the largest town centre in Havering, it was only to be expected that all parts of the borough have direct transport links to Romford.

- 3.40** In terms of geography, respondents in support of our initial proposals argued that Emerson Park ward is separated from the rest of the Hornchurch and Upminster constituency by the clear 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 ward and Squirrel's Heath ward. The Labour Party submitted that Emerson Park ward 'has a clear boundary along the railway line with Hylands and St Andrews wards while its boundary with Squirrel's Heath is indistinct and divides residential neighbourhoods. We believe it would fit well into the Romford BC' (BCE-95656).
- 3.41** Some differing views were expressed regarding the electoral and administrative history of Emerson Park ward. Those in support of our initial proposals often referenced a large portion of Emerson Park ward being included in the Romford constituency until 2010, specifically, the Nelves area (see, for example, petition BCE-86397 and Andrew Rosindell MP's representation BCE-85341). Thus our initial proposals would 'restore links' between Emerson Park and Romford. Those in opposition explained that the Nelves area had been part of the former Ardleigh Green ward, and according to Julia Lopez MP this area only 'temporarily' fell within the Romford constituency (BCE-84512). Julia Lopez MP and several other respondents emphasised that Emerson Park was formerly part of Hornchurch Urban District until the council was superseded by the borough of Havering in 1965.
- 3.42** We received some representations suggesting that we should reconsider the name of the Hornchurch and Upminster constituency. Andrew Rosindell MP asserted that including Hornchurch in the constituency name was 'misleading' since 'the town of Hornchurch is, and will continue to be, split between the three Havering constituencies' (BCE-96869). Respondents also said that the Harold community (Harold Hill, Harold Park, and Harold Wood) should be referenced in the name, since this community is the largest community in the constituency. Upminster and The Harolds was the most popular proposed name, with Andrew Rosindell MP arguing that this name 'would reflect the true geographical area covered by the constituency'.

- 3.43 In terms of alternative solutions for the borough of Havering, several representations proposed transferring all or part of the Harold Hill area (Heaton and Gooshays wards) to the Romford constituency instead of Emerson Park, citing Harold Hill's historic links with Romford. David Ainsworth (BCE-58467), for instance, stated that the Harold Hill estate 'is part of Romford, identifies with Romford and has a Romford postal address'.
- 3.44 A number of representations submitted that changes to the Hornchurch and Upminster constituency and the Romford constituency 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. This was the approach taken by the Conservative Party, who proposed maintaining the Romford constituency wholly unchanged, with the only change to the Hornchurch and Upminster constituency being the transfer of two polling districts from Hacton ward (HN4 and HN5) to the Dagenham and Rainham constituency. The Conservative Party argued that 'our proposals move 9,873 fewer electors in Havering than the Commission's proposals and restore local ties in Hornchurch being more compliant with Rule 5 (1) c and d' (BCE-86589). A number of local councillors and other respondents supported this counter-proposal.
- 3.45 We received a counter-proposal from BCE-54224 that also claimed to minimise disruption to the existing constituencies in Havering. This counter-proposal would maintain the Romford constituency wholly unchanged, keep Emerson Park ward in the Hornchurch and Upminster constituency, but transfer the whole of Hacton ward to the Dagenham and Rainham constituency.
- 3.46 Several representations advocated that we should consider Havering's new ward boundaries. The Order for new electoral arrangements in Havering was made in September 2021 – well after the cut-off date for local government boundaries that we 'may take into account' under the Act. Notwithstanding that, respondents, including local councillors, Andrew Rosindell MP, the Hornchurch and Upminster Conservative Association, the Conservative Party, and local residents, suggested that a solution for the area could be found using the boundaries of the *new* Emerson Park, Squirrel's Heath and/or Elm Park wards. It was brought to our attention that parts of the existing EM2 and EM4 polling districts of Emerson Park ward had been transferred to the new Squirrel's Heath ward following the local government boundary review, and that the new Elm Park ward (located to the southwest of Hornchurch town centre) now encompassed more of the Elm Park community by taking in parts of the existing Hacton and St Andrew's wards. Some localised counter-proposals (BCE-56623, BCE-72164) were based on Havering's new ward boundaries. Respondents argued that using

the new boundaries would better reflect community ties, in particular uniting the Elm Park community (which is currently divided between constituencies), and would avoid splitting new wards and the confusion that could result over that in coming years.

- 3.47** The Assistant Commissioners assessed the conflicting evidence and arguments presented in relation to our proposed transfer of Emerson Park ward. They were careful not to place too much weight simply on the number of signatories for each petition received, not least as the petitions had been organised via different processes and therefore could not be compared like-for-like. In terms of the unique representations received, the Assistant Commissioners noted that the large majority of representations in opposition were provided by actual residents of Emerson Park ward, with the remainder mostly provided by residents of the Hornchurch and Upminster areas. By contrast, only a small percentage of the representations in support were provided by residents of Emerson Park ward, with much of the support stemming from residents of the Romford constituency. Analysing the merits of the arguments put forward, the Assistant Commissioners were persuaded that most of Emerson Park ward residents felt more closely tied to Hornchurch rather than Romford for local services and amenities, despite the railway line dividing Emerson Park from Hornchurch town centre, and they acknowledged the historical connections between Emerson Park and Hornchurch. They also acknowledged, however, that the westernmost parts of the ward also integrated seamlessly with the Ardleigh Green and Heath Park areas within the existing Romford constituency.
- 3.48** The Assistant Commissioners assessed the merits of the counter-proposals provided for the area. First they noted that, while the split of Hylands ward in our initial proposals attracted very little opposition, the counter-proposal from Oliver Raven would not split any ward across the entire North East London sub-region. This counter-proposal would also keep Emerson Park ward in the Hornchurch and Upminster constituency. Despite these positive aspects, the Assistant Commissioners considered that this counter-proposal would result in extensive disruption to the existing constituencies across the sub-region and break local ties in several areas.

- 3.49** The Assistant Commissioners noted that the counter-proposals from Oliver Raven and BCE-79433 would include Heaton and Gooshays wards in a Romford constituency, thereby addressing the consultation responses that said those wards – comprising the Harold Hill community – would make a more logical extension to the Romford constituency than Emerson Park ward. However, the Assistant Commissioners considered that including Heaton and Gooshays wards in a different constituency to Harold Wood ward would separate the Harold Hill community from its close neighbours in Harold Park and Harold Wood. They noted Andrew Rosindell MP’s comments that ‘[The Harolds] cannot be separated as they form one integrated community’ (BCE-96869). The Assistant Commissioners further considered that these counter-proposals would again result in unnecessary change to existing constituencies elsewhere in the North East sub-region.
- 3.50** Turning to the Conservative Party counter-proposal, the Assistant Commissioners felt that there was merit in this approach: the counter-proposal would retain the Romford constituency wholly unchanged, and keep Emerson Park ward in the Hornchurch and Upminster constituency by dividing Hacton ward rather than Hylands ward. Change to existing constituencies would therefore be minimised, and there would be no wider knock-on effects to the sub-region. Although the counter-proposal in representation BCE-54224 would also retain the Romford constituency wholly unchanged and address the concerns from Emerson Park ward, the Assistant Commissioners considered that the transfer of the whole of Hacton ward to the Dagenham and Rainham constituency would divide the town of Hornchurch and break local ties in the south of the town. There would also be potentially disruptive implications to this counter-proposal across the rest of the North East sub-region.
- 3.51** Given the number of representations that suggested taking into account Havering’s new ward boundaries, and since splitting a ward in the area was a realistic prospect, the Assistant Commissioners were interested in exploring solutions based on Havering’s new boundaries. Our policy states that, where we are considering splitting a ward, ‘in considering how to split that ward, the BCE is prepared to take into account, as appropriate, any new ward boundaries introduced after 1 December 2020.’¹² Following analysis of Havering’s new ward boundaries, and prompted by suggestions and evidence provided in representations, the Assistant Commissioners determined a potential solution for the Hornchurch area based on the new ward boundaries, as follows: the existing¹³ Hacton ward and St Andrew’s ward would be divided between the Hornchurch and Upminster, and Dagenham and Rainham constituencies, such that those parts of the existing wards that fall under the new Elm Park ward,

¹² Guide to the 2023 Review, paragraph 40.

¹³ We use ‘existing’ in this context to refer to the ward boundaries that existed or were in prospect as at 1 December 2020, even if – as in the case of Havering – they have ceased to exist in practice (we identify the more recently implemented wards instead as ‘new’).

would be included in the Dagenham and Rainham constituency. The existing Emerson Park ward would then be divided between the Hornchurch and Upminster, and Romford, constituencies, such that those parts of the existing ward that fall under the new Squirrel's Heath ward would be included in the Romford constituency. The Assistant Commissioners noted that, even under this approach, it would not be numerically possible to include in the Hornchurch and Upminster constituency those southwesterly parts of the new Hacton ward that extend into the existing Elm Park ward; these areas would accordingly remain in the Dagenham and Rainham constituency.

- 3.52** To help the Assistant Commissioners gain a better understanding of the Hornchurch area 'on the ground', and to help them weigh up the Conservative Party's counter-proposal against other options, they visited the area. They assessed the Conservative Party's proposed split of Hacton ward by driving down the road that would become the constituency boundary, and considered that splitting the ward in such a way would divide a close-knit residential neighbourhood. They were therefore not convinced that the Conservative Party's solution was viable. Having explored the Elm Park area, they conceded that Abbs Cross Lane / South End Road – the new ward boundary – would make a more suitable constituency boundary. Visiting Emerson Park ward demonstrated to the Assistant Commissioners that the western part of the ward has close links with Ardleigh Green and other areas of the neighbouring Squirrel's Heath ward, but that the bulk of the ward would predominantly gravitate to Hornchurch town centre. They noted that the railway line at the southerly boundary of Emerson Park ward ran below street level and was easily traversed by a road bridge, in addition to other pedestrian crossing points.

- 3.53** Following their visit, and having assessed further ways in which Emerson Park, Hacton, and St Andrew's wards could be divided along existing and/or new boundaries, the Assistant Commissioners recommended the solution described above, which takes into account almost all of the new boundaries of Elm Park ward and Squirrel's Heath ward. Although this solution would divide three existing wards, and although it would not use the new boundary at the southwestern end of Hacton ward, the Assistant Commissioners considered that it would much better reflect community ties on the ground than the Conservative Party counter-proposal, and would address the numerous representations received about Emerson Park ward and the surrounding area. By aligning the constituency boundary with the new boundary of Squirrel's Heath ward, the solution would enable those parts of the existing Emerson Park ward that are geographically close to the Ardleigh Green and Heath Park communities to be included with them in the Romford constituency, while the remainder of the existing Emerson Park ward would remain with Hornchurch. By aligning the constituency boundary with the new ward boundaries in the Elm Park area, the Elm Park community could be united in a single constituency. The Assistant Commissioners also considered that their recommended solution would more closely reflect the existing constituencies than our initial proposals, and would provide a degree of 'future-proofing' for the area, in that only one new ward, Hacton, would be divided between constituencies.
- 3.54** Regarding the naming of the Hornchurch and Upminster constituency, the Assistant Commissioners acknowledged the merits of referencing the Harold community in the constituency's name, but they were not persuaded that Hornchurch should be removed from the name, since Hornchurch town centre and the bulk of the Hornchurch community would be included in the constituency. They also considered that their recommended constituency was very similar to the existing Hornchurch and Upminster constituency, and Commission policy states that 'when constituencies remain largely unchanged, the existing constituency name should usually be retained.'¹⁴ Accordingly, they recommended that the name Hornchurch and Upminster should be retained.
- 3.55** We considered the evidence presented to us by the Assistant Commissioners, being mindful that their recommended solution for the borough of Havering would divide three existing wards. We concluded that their recommendation adhered to our policy on ward splitting, particularly as it avoided significant consequential disruption that would result from whole-ward options. We therefore accept their recommendation, and propose a revised composition of the Hornchurch and Upminster constituency, the Romford constituency, and the Dagenham and Rainham constituency as set out above. We agree that the name Hornchurch and Upminster should not be changed.

¹⁴ Guide to the 2023 Review, paragraph 44.

Barking and Dagenham, Redbridge, and Waltham Forest

- 3.56** In our initial proposals for the boroughs of Barking and Dagenham, and Redbridge, we proposed transferring certain wards between the four constituencies of Barking, Dagenham and Rainham, Ilford North, and Ilford South in order to bring them within the permitted electorate range: 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.
- 3.57** We received very few comments regarding our proposed transfer of Valence ward, although one local resident, Alexander Hollis (BCE-54384), strongly supported the proposal because, in his experience, locals regarded Valence ward as part of Dagenham rather than Barking. 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 (borough of Redbridge). We received a petition of 156 signatures from local residents in opposition (BCE-96898). They contended that our initial proposals would break local ties between Chadwell Heath and Whalebone wards, which are both in the borough of Barking and Dagenham and encompass the Chadwell Heath community either side of the A118 road. Our proposals would therefore 'divide an established community'. However, we also received support for our initial proposals, with the Chadwell Heath South Residents' Association (BCE-81131) arguing that 'bringing Chadwell ward [currently in Ilford South] and Chadwell Heath ward under one constituency is a positive step towards unifying the entire Chadwell Heath area. Residents have never considered [the borough boundary] to be a hard border, and communities on both sides have historically shared very similar issues.' Similar sentiments were expressed by Councillor Bert Jones (BCE-77301), among others.

- 3.58** The Assistant Commissioners noted that the Conservative Party counter-proposal would keep Chadwell Heath ward together with Whalebone ward in the Dagenham and Rainham constituency, but Becontree ward (currently in the Barking constituency) would consequently become an orphan ward in the Ilford South constituency. They considered this counter-proposal carefully, but found no compelling evidence that Becontree would make a more suitable orphan ward than Chadwell Heath, noting that the transfer of Becontree ward from the Barking constituency to the Ilford South constituency would break local ties in the Becontree estate. On this they agreed with the Labour Party, who wrote: 'Becontree is part of the Becontree Estate which forms the core of the Barking & Dagenham Borough and this counter proposal would sever its ties with surrounding wards such as Mayesbrook and Parsloes which are part of the same community. It would be a true orphan ward within Ilford South, not just the only one from its borough but of a completely different character' (BCE-95656). The Assistant Commissioners also observed that Becontree ward is separated from the rest of the Ilford South constituency by Goodmayes Park and playing fields – natural boundaries – whereas the northern part of the boundary between Chadwell and Chadwell Heath wards is indistinct, running along residential roads.
- 3.59** The Assistant Commissioners noted the comment in some representations that, if Chadwell Heath ward were to be included in the Ilford South constituency, Whalebone ward should be split such that the northern part of the ward above the railway line would also be included in the Ilford South constituency (BCE-96898, BCE-81131). Respondents stated that the section of Whalebone ward north of the railway line is part of the Chadwell Heath community, whereas the section of the ward south of the railway line is part of the Becontree community. Aligning the constituency boundary with the railway line would therefore better reflect local ties. The Assistant Commissioners explored this possibility, using the polling districts broadly north and south of the railway line, but found that this would take Ilford South above the permitted electorate range.
- 3.60** We received a representation from the London Borough of Barking and Dagenham (BCE-82367) submitting that we should align our proposed constituency boundaries in the borough with Barking and Dagenham's new ward boundaries, the Order for which was made in December 2021 – again well after the statutory cut-off date. The Assistant Commissioners considered that using the new boundary of Whalebone ward would unite more of the Chadwell Heath community that lies above the A118 road, but that this community would still ultimately be divided by the A118 (the boundary between the new Chadwell Heath and Whalebone wards), since this community is said to span the road. Therefore the Assistant Commissioners considered that taking account of Barking and Dagenham's new ward boundaries would not provide a usefully improved solution for the Chadwell Heath area.

- 3.61** In light of their assessments, and noting also that our initial proposals did receive a degree of support, the Assistant Commissioners recommended that our initial proposals should be retained for the constituencies of Barking and Ilford South, with no further revisions to the initially proposed Dagenham and Rainham constituency beyond those specified above. We agree with their recommendations.
- 3.62** Our initial proposals for the Ilford North constituency received a mixture of support and opposition from local residents regarding the transfer of Cranbrook and Valentines wards from the Ilford South to the Ilford North constituency. Those in support argued that our initial proposals would unite Cranbrook and Valentines wards with Barkingside and Clayhall wards, whose residents all gravitate to the shared local hub of Gants Hill, making use of its shops, restaurants, and tube station. One resident of Valentines ward, Alexander Holmes (BCE-85395), wrote: ‘I usually commute from Gants Hill station (in Ilford North), and cross the constituency border into Gants Hill regularly.’ Those in opposition contended that the A12 road (which runs through Gants Hill and acts as the current constituency boundary) is a physical barrier, and that our initial proposals would separate Cranbrook and Valentines wards from Ilford town centre, where many residents use local amenities. A resident of Cranbrook ward, BCE-84315, pointed out that ‘Ilford Town Centre is only a few minutes by vehicle or by foot.’
- 3.63** Having considered the evidence, and the alternative options provided by counter-proposals from Oliver Raven and BCE-79433, the Assistant Commissioners concluded that no alternative configuration for the Ilford North constituency would better reflect the statutory factors than our initial proposals. They also noted the support from the Conservative Party, who agreed that Cranbrook and Valentines wards made a ‘very logical extension’ to the Ilford North constituency (BCE-86589). The Assistant Commissioners therefore recommended that our initial proposals should be retained for the Ilford North constituency, and we agree.
- 3.64** 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 Redbridge borough, and included the whole of South Woodford ward (in which part of the existing constituency is already contained). The existing Chingford and Woodford Green constituency – also spanning Waltham Forest and Redbridge – was realigned with new local government ward boundaries, and additionally included Bridge ward from the existing Ilford North constituency.

- 3.65 A number of representations from the borough of Waltham Forest drew attention to the A406 North Circular road. The boundaries of Chapel End ward, and Hale End and Highams Park ward – which form the boundaries of the Walthamstow constituency and the Chingford and Woodford Green constituency, both as existing and as initially proposed – traverse the A406. However, since an Electoral Changes Order was made in May 2021, Waltham Forest has new ward boundaries that follow the A406 rather than cross it. Respondents said that the constituency boundaries should be adjusted to reflect the new ward boundaries, arguing that the North Circular is a ‘hard boundary’ with different communities living on either side. They further noted that following the expansion of the Ultra Low Emission Zone to the A406 in 2021, the road also represents a financial boundary. The suggestion to align the constituency boundaries to the A406 was put forward in the Conservative Party counter-proposal, as well as by Sir Iain Duncan Smith, MP for Chingford and Woodford Green (BCE-82509, BCE-97593), and in a campaign from local residents (BCE-61086). However, David Lee, on behalf of the Chingford and Woodford Green Labour Party (BCE-97615), noted that this proposal would require two existing wards to be divided. He opposed it on the basis that it would breach one of the statutory factors and would be in contravention to the BCE’s own guidelines on splitting wards.
- 3.66 The Assistant Commissioners recognised the strength of the arguments encouraging us to align the boundary of the Chingford and Woodford Green, and Walthamstow constituencies with the A406. However, they were ultimately persuaded by the arguments of David Lee: this proposed amendment would require two existing wards to be split, and these splits would not sufficiently meet any of our criteria for ward splitting,¹⁵ in particular representing change to the existing Walthamstow constituency, which our initial proposals would otherwise maintain wholly unchanged and which was generally well supported in the consultation periods. In light of their assessments, and noting also the strong support for the inclusion of Bridge ward in the Chingford and Woodford Green constituency, the Assistant Commissioners recommended that our initial proposals for the Chingford and Woodford Green constituency and the Walthamstow constituency should be retained unchanged. We accept the recommendations of the Assistant Commissioners and agree with their assessment that alignment with new ward boundaries is not in itself sufficient justification for ward splitting.

¹⁵ Guide to the 2023 Review, paragraph 31.

- 3.67 Regarding the Leyton and Wanstead constituency, the Assistant Commissioners observed that there were differing views over the proposed inclusion of South Woodford ward in this constituency. Most respondents supported our initial proposals, including South Woodford ward councillor Beverley Brewer (BCE-81222), John Cryer, MP for Leyton and Wanstead (BCE-82992), and the Chingford and Woodford Green Constituency Labour Party (BCE-84455), citing local ties between South Woodford and Wanstead. Other respondents, however, argued that residents of South Woodford identify as part of the wider Woodford community to the north. Robert Cole, on behalf of South Woodford Ward Conservatives (BCE-79475, BCE-97600), drew attention to the South Woodford Neighbourhood Forum area, which extends north over the A406 into Churchfields ward. Robert Cole provided a counter-proposal for South Woodford ward to be included in the Chingford and Woodford Green constituency, as did BCE-55200, but the Assistant Commissioners considered that both these counter-proposals would cause disruptive knock-on effects to the Leyton and Wanstead, and Walthamstow constituencies. Having weighed up the evidence, and having deemed both counter-proposals to create unnecessary change in the borough of Waltham Forest, the Assistant Commissioners recommended that our initial proposals for the Leyton and Wanstead constituency should be retained. We concur with their recommendation.

Newham and Tower Hamlets

- 3.68 The boroughs of Newham and Tower Hamlets currently have four constituencies. Due to significant growth in the number of electors in this area, our initial proposals allocated five constituencies to the pair of boroughs. We proposed one constituency, Stratford and Bow, crossing the River Lee between Stratford and New Town ward in Newham, and Bow East ward and Bromley North ward in Tower Hamlets. When constructing the four other constituencies for the sub-region, we tried to reflect the existing arrangement as closely as was practicable.
- 3.69 We received near unanimous support for grouping Newham and Tower Hamlets together as a sub-region, and our initial proposals were fully supported by the Conservative Party (BCE-86589, BCE-96881, BCE-97483), the Labour Party (BCE-79496, BCE-95656, BCE-97485), and the Liberal Democrats (BCE-80979, BCE-94859, BCE-97487). Counter-proposals were provided by John Bryant (BCE-73494), Oliver Raven (BCE-85352) and BCE-79433. Notably, two of the counter-proposals put forward a Poplar and Canning Town constituency, crossing the River Lee in the south of the two boroughs, in place of (or in addition to) a constituency crossing the River Lee in the north of the two boroughs, as our initial proposals did. John Bryant referenced the precedent of a Poplar and Canning Town constituency that existed from 1997 to 2010 (BCE-73494, BCE-97497).

- 3.70 Despite receiving fewer than 90 representations from respondents in Newham and Tower Hamlets, a number of themes emerged. Respondents expressed a mixture of support and opposition for the proposed Stratford and Bow constituency. The main argument against the proposed constituency was that it would not respect borough boundaries, and some respondents such as Andrew Corti (BCE-90989) also argued that the A12 road and the Olympic Park represented ‘significant barriers’ between the Newham part and the Tower Hamlets part of the constituency. Conversely, a number of respondents supported the constituency, in particular agreeing that crossing the Lee towards the north of the borough boundary would make more sense than towards the south. For example, BCE-84217 noted that the river is ‘narrow/canalised’ between Stratford and Bow and there are ‘ample’ crossing points for pedestrians, cyclists, drivers, and public transport users. Towards the south, however, the river is much wider with fewer crossings – thus a ‘barrier separating communities’. BCE-84217 also contended that the Olympic Park is a ‘common area of community focus’ for north west Newham and north east Tower Hamlets, rather than forming a barrier between them. In opposition to John Bryant’s counter-proposal, BCE-96899 noted that the ‘links between Bow and Stratford are multifold’. The Conservative Party, the Labour Party, and the Liberal Democrats all commented on the strength of the transport links between Stratford and Bow.
- 3.71 Having assessed the arguments and counter-proposals for the location of a constituency crossing the River Lee, the Assistant Commissioners were persuaded that a cross-river constituency between Stratford and Bow presented a much more logical solution than one between Poplar and Canning Town, given the greater number of links across the river and the recent development of the Olympic Park area. They further considered that those counter-proposals for a Poplar and Canning Town constituency would cause greater disruption to the existing constituencies than our initial proposals across the rest of the sub-region. They agreed with the Conservative Party’s analysis that the counter-proposal from John Bryant would ‘split ties in Poplar by splitting the Lansbury and Poplar wards into different constituencies’ (BCE-96881) – and they considered that local ties would be broken elsewhere under any of the counter-proposals.
- 3.72 We received some representations advocating a ward swap in Newham: respondents such as BCE-76705 argued that West Ham ward should be included in the Stratford and Bow constituency rather than the West Ham and Beckton constituency, and in turn, Green Street West ward should be included in the West Ham and Beckton constituency. They contended that West Ham ward extends almost to Stratford High Street, contains Stratford Park, and comes under the same council-designated community neighbourhood as Stratford. They also argued that the District Line would make a coherent constituency boundary at the south of the ward.

- 3.73 Our Assistant Commissioners acknowledged that while some parts of West Ham ward undoubtedly have local ties with Stratford, the ward also encompasses core areas of West Ham and contains amenities such as West Ham Park and West Ham C of E Primary School. The Assistant Commissioners felt that Green Street West ward would be somewhat isolated in its new constituency should this swap be implemented, and they found no compelling evidence that Green Street West ward has stronger ties with the Plaistow area (in the proposed West Ham and Beckton constituency) than the Forest Gate area (in the proposed Stratford and Bow constituency). In light of these considerations, the Assistant Commissioners did not recommend that West Ham ward be swapped with Green Street West ward.
- 3.74 With regard to the name of our proposed Poplar and Limehouse constituency, some representations argued that Isle of Dogs, Canary Wharf, or Docklands should be included in the constituency name, among other suggestions. Councillor Andrew Wood (BCE-80621) conducted social media polls asking local residents to choose their preferred name for the constituency, with Poplar and the Isle of Dogs emerging as the top choice. However, BCE-96899 countered Councillor Wood's submission, arguing that the Isle of Dogs is itself part of Poplar, and that Poplar and Limehouse would be a more inclusive name for the constituency. BCE-96899 also highlighted that the Facebook survey was conducted on the Canary Wharf and Isle of Dogs Facebook group, and it was therefore questionable how representative it was of views across the whole constituency. Other respondents similarly saw no need for the constituency name to change, with Councillor Peter Golds (BCE-73892) noting that the constituency 'includes the bulk of the former borough of Poplar and most of the historic Limehouse constituency'. Regarding the composition of the constituency, a small number of respondents were concerned that St. Katharine's & Wapping ward formed a long salient to the constituency, and proposed that this ward should instead be included in the Bethnal Green and Stepney constituency in place of St. Dunstan's ward. On this issue, however, the Conservative Party stated: 'Although we note the St Katharine's and Wapping ward is connected to the rest of the [Poplar and Limehouse] constituency by a very narrow strip of land in the vicinity of Butcher Row we consider its closest links to be with its fellow riverside residential wards of Limehouse and Canary Wharf than with the more densely populated wards to the north from which it is divided by the Highway' (BCE-86589). The Liberal Democrats also emphasised the riverside character that St. Katharine's & Wapping ward shared with the wards of Limehouse, Canary Wharf, Island Gardens, and Blackwall & Cubitt Town.

- 3.75** Having considered the various arguments concerning the name of the Poplar and Limehouse constituency, the Assistant Commissioners were persuaded by the representations of BCE-96899 and Councillor Golds, concluding that there were no compelling reasons to change the name of the constituency. While acknowledging that the proposed constituency would not include Limehouse station, the Assistant Commissioners noted that the shape and geographical span of the constituency would be very similar to the existing Poplar and Limehouse constituency. In addressing the question of whether St. Katharine's & Wapping ward should be included in the Poplar and Limehouse constituency or the Bethnal Green and Stepney constituency, the Assistant Commissioners agreed that there was a common riverside character between this and other wards proposed to be included in the Poplar and Limehouse constituency, and they also considered that swapping St. Katharine's & Wapping ward for St. Dunstan's ward would divide the Stepney community.
- 3.76** Our proposed East Ham constituency was almost unanimously supported, with respondents noting that the eight wards comprising the constituency were the wards that identify most closely with East Ham. Stephen Timms, MP for East Ham (BCE-72204, BCE-97554), stated that the proposed boundary successfully reflected the local geography and transport corridors. We received very little feedback on our proposed transfer of Beckton and Royal Docks wards from the East Ham constituency to the West Ham and Beckton constituency, but the Conservative Party commented that 'Beckton is clearly divided from East Ham by the A13 which forms a logical southern boundary to the seat. Beckton and Royal Docks wards are both rather isolated areas whose best transport links run east-west to Canning Town ... It therefore makes logical sense and better reflects transport links to add these two wards to the new seat based on Canning Town and West Ham' (BCE-86589).
- 3.77** We received a representation from the London Borough of Newham (BCE-85858) requesting that we align our proposed constituency boundaries in the borough with Newham's new ward boundaries, which were made Order in May 2021. The Assistant Commissioners acknowledged this representation but, as outlined previously, they noted that using post-December 2020 ward boundaries would not be in accordance with the statutory factors, especially since we are not considering splitting a ward in this borough.
- 3.78** Given the broad support for our initial proposals in the Newham and Tower Hamlets sub-region, and in light of their analysis of the counter-proposals and alternative options, our Assistant Commissioners did not recommend any changes to our initial proposals for this sub-region. We agree with their assessment and propose 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.

North Central London

- 3.79** As previously described, our initial proposals treated North Central and North West London as one large 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.
- 3.80** 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 would be divided into five constituencies in our initial proposals. In addition to the two constituencies spanning the A5, 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 Barnet wards in an Enfield-based constituency. One proposed constituency, High Barnet and Mill Hill, would be wholly contained within the borough of Barnet.
- 3.81** 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 prospective local government ward boundaries. In the borough of Haringey, we proposed a Tottenham constituency that would include two Hackney wards, while West Green and White Hart Lane wards would be 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 Dalston ward would be transferred to the Islington North constituency. We also proposed that Tufnell Park ward, from the borough of Islington, be transferred to the Camden-based Kentish Town and Bloomsbury constituency, which would result in two orphan wards in this area. We proposed that the City of London should be paired with 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 would cross the borough boundary with Westminster.

- 3.82** The Conservative Party (BCE-86589, BCE-96881, BCE-97483) and the Liberal Democrats (BCE-80979, BCE-94859, BCE-97487) opposed almost all our initial proposals for these boroughs and provided counter-proposals. The Labour Party (BCE-79496, BCE-97485), while not necessarily endorsing our initial proposals, provided a counter-proposal for only the borough of Haringey. They subsequently (BCE-95656) supported the Liberal Democrats' counter-proposal. The Green Party (BCE-83421, BCE-97484) provided a counter-proposal covering parts of the boroughs of Hackney and Islington. We received extensive counter-proposals from John Bryant (BCE-73747, BCE-94748), Peter Whitehead (BCE-78064), Jonathan Stansby (BCE-89921), and Adam Gray (BCE-61555), among others. John Bryant's second submission supported more of our initial proposals, particularly in the boroughs of Enfield and Haringey. We also received several localised counter-proposals covering a small number of constituencies or boroughs.
- 3.83** As previously outlined, most of the counter-proposals provided to us respected the A5 road as a dividing line. Consequently, the boroughs of Barnet and – in many cases – Camden, were divided into fewer constituencies, and there were fewer borough boundary crossings on the whole. The majority of the counter-proposals also retained the City of London's pairing with Westminster, rather than joining it with Islington.

Barnet

- 3.84** Representations from local residents, organisations, and community spokespeople expressed a mixture of support and opposition for constituencies crossing the A5 road. Our proposed Stanmore and Edgware constituency was mostly opposed, with respondents such as Bob Blackman, MP for Harrow East (BCE-77996, BCE-97660), Matthew Offord, MP for Hendon (BCE-81062, BCE-97631), and local councillor BCE-85979 arguing that the A5 represents a natural and historic boundary between Barnet and Harrow, and that the primary transport links from Edgware run south through Hendon rather than west across to Stanmore. Conversely, some respondents supported the proposed constituency, arguing that the Edgware community in fact spans the A5 (as demonstrated by wards being named 'Edgware' in both Barnet and Harrow) and that residents use local services on either side of the road. BCE-91108 drew attention to the Edgware Growth Area Supplementary Planning Document, adopted by Barnet and Harrow local authorities, which recognises that Edgware town centre extends across the A5. Matthew Offord MP, however, wrote: 'Only a very tiny part of Edgware is within the borough of Harrow' and '[Residential] development is very specific to Edgware to the east and Harrow to the west' (BCE-81062).

- 3.85** Our proposed Hendon and Golders Green constituency was largely supported by local residents. Many respondents such as BCE-90170, Jeffrey Littman (BCE-97585), Councillor Zakia Zubairi (BCE-78324), and Reverend Matthew Duckett (BCE-77824) argued that the proposed constituency would reflect religious communities, in particular the Orthodox Jewish community, as well as Muslim, Hindu, Christian, and Buddhist faith groups. Respondents also described abundant community links between Kingsbury (Brent) and Colindale / West Hendon (Barnet), and argued that the Welsh Harp reservoir and Brent Cross shopping centre would be focal points for the constituency – submissions from BCE-91448 and local councillor BCE-81106 provide examples of these arguments. Conversely, others viewed the Welsh Harp reservoir and the A5 as geographic barriers. The London Borough of Brent (BCE-81617) contended that Cool Oak Lane does not present an appropriate link across the Welsh Harp reservoir since ‘it is a very narrow lane and not suitable for pedestrians’, and furthermore, ‘crossing the A5 at this point by car is also very difficult with one way streets and no right turns off the A5 into Hendon in this area.’ Concerns were also raised by respondents such as Councillor Peter Zinkin (BCE-97715) that the Orthodox Jewish community would be represented almost wholly within the Hendon and Golders Green constituency, reducing that community’s representation to one MP, rather than across two constituencies as in the present arrangement.
- 3.86** Across the rest of the borough of Barnet, our initial proposals were again received with a balance of support and opposition. Regarding our proposed Finchley and Muswell Hill constituency, concerns were expressed over crossing the borough boundary between Barnet and Haringey. Several respondents – including local resident BCE-83654 and the Finchley and Golders Green Conservative Association (BCE-85908) – argued that the existing Finchley and Golders Green constituency is highly cohesive in terms of community ties and transport links, and that there are comparatively few links between the Finchley area (Barnet) and the Muswell Hill area (Haringey). Residents of Garden Suburb ward in particular emphasised their practical and historic links with Golders Green and Temple Fortune (Finchley Road), rather than Muswell Hill (BCE-89213). Residents from Haringey contended that our initial proposals would split the Muswell Hill community, and on a wider level, would separate areas that all identify as part of the former borough of Hornsey. A number of respondents, however, including the Finchley and Golders Green Labour Party (BCE-81119), supported our initial proposals, arguing that Finchley shares more in common with Muswell Hill and Highgate than it does with Childs Hill, Cricklewood, and Golders Green. Representations from Sarah Sackman (BCE-91502) and a local campaign (BCE-91543) – which also supported the proposed Hendon and Golders Green constituency – outlined strong geographic, transport, community,

and religious ties across the proposed Finchley and Muswell Hill constituency, drawing attention in particular to the uniting thread of the Northern Line (High Barnet branch). Some respondents noted that East Finchley town centre serves residents on both the Barnet and Haringey sides of the borough boundary.

- 3.87** Further north in the borough of Barnet, we received strong opposition to the transfer of East Barnet and Brunswick Park wards from the Chipping Barnet constituency to the proposed Southgate and Barnet East constituency. Local residents, Theresa Villiers, MP for Chipping Barnet (BCE-83552, BCE-89861, BCE-97648), and the Chipping Barnet Conservative Association (BCE-84097, BCE-97669) were among those who set out numerous historic and community reasons why East Barnet and Brunswick Park wards should remain in a constituency with the rest of the High Barnet area, rather than being paired with Southgate in the borough of Enfield. Respondents emphasised that the East Coast Main Line railway, which marks the western boundary of East Barnet and Brunswick Park wards, does not separate but unites the communities on either side – especially the New Barnet community that spans the railway line between Barnet Vale and East Barnet wards. These responses said that the initial proposals would therefore divide the New Barnet community, breaking local ties.
- 3.88** There was notable support for the Conservative Party's counter-proposal for the borough of Barnet, and for their proposed Chipping Barnet constituency in particular, including a campaign (BCE-80738) that highlighted how our initial proposals would divide Barnet into five constituencies, only one of which would be wholly contained within the borough. In contrast, the Conservative Party's counter-proposal would divide Barnet into four constituencies, three of which would be wholly contained within the borough, and with the Finchley and Golders Green constituency remaining largely unchanged from its current boundaries.
- 3.89** Similarly to the Conservative Party, the Liberal Democrats proposed four constituencies covering the borough of Barnet, three of which would be wholly contained within the borough. They proposed exactly the same Chipping Barnet and Hendon constituencies as the Conservative Party, but presented a different arrangement for a Finchley constituency. John Bryant's first counter-proposal and Adam Gray's counter-proposal presented a very similar arrangement to the Liberal Democrats' for Barnet, with only a small difference in the southwest corner of the borough. A slightly different approach was taken in John Bryant's second counter-proposal, matched in part by Peter Whitehead and Jonathan Stansby: all three of these included Mill Hill ward in place of Brunswick Park ward in their Chipping Barnet successor constituency, resulting in a much narrower Hendon constituency. John Bryant consequently included Brunswick Park and Friern Barnet wards in a Southgate constituency – thereby pairing them with wards in the borough of Enfield – whereas Peter Whitehead and Jonathan Stansby included Brunswick Park and Friern Barnet wards in their Finchley

constituency. We received a number of other counter-proposals for the borough of Barnet, but we noted that these counter-proposals often made reference to existing rather than prospective ward boundaries¹⁶ and/or proposed splitting at least one ward in the borough.

- 3.90** The Assistant Commissioners recognised the interplay of several issues in our initial proposals for Barnet, and the finely balanced, often conflicting, views put forward by respondents. They acknowledged the merits of those representations in support of the proposed Stanmore and Edgware, and Hendon and Golders Green constituencies, which both crossed the A5 road. They also acknowledged the strength of those representations in support of our initial proposals for the Finchley and Muswell Hill constituency, which spanned the boroughs of Barnet and Haringey. They noted, however, that these representations often argued that our initial proposals would ‘build on existing local ties’ or ‘reinforce’ community ties (for example, the campaign in support: BCE-91543), whereas representations in opposition provided evidence of ways in which our initial proposals would break local ties.
- 3.91** In terms of the counter-proposals provided, the Assistant Commissioners noted that the Conservative Party’s and Liberal Democrats’ proposed Chipping Barnet and Hendon constituencies were very similar to the existing Chipping Barnet and Hendon constituencies, save for the transfer of Edgwarebury ward from Hendon to Chipping Barnet, and the transfer of Friern Barnet ward (currently in Chipping Barnet) to a different constituency. They observed that a number of other counter-proposals took a similar approach, particularly regarding Edgwarebury ward. While acknowledging Edgwarebury’s close ties with the town of Edgware, especially in that part of the ward west of the M1 motorway, the Assistant Commissioners noted that retaining this ward in the Hendon constituency would bring the Hendon constituency over the permitted electorate range. They also noted that it would not be numerically possible to include Mill Hill ward instead of Edgwarebury ward in the Chipping Barnet constituency. They therefore conceded that, in order to avoid significant disruption elsewhere, Edgwarebury ward would need to be included in a Chipping Barnet constituency. They noted the arguments in support of this approach from Theresa Villiers MP, the campaign BCE-80738, and others, who contended that Edgwarebury ward shares green belt characteristics with other Chipping Barnet wards, and is linked by roads and bus routes to High Barnet and the Totteridge and Whetstone area.

¹⁶ Barnet was one of the London boroughs with prospective wards already made by Order as at 1 December 2020. It is such a prospective boundary ‘rather than any existing boundary which it replaces’ that the Act states the Commission may take into account.

- 3.92 The Assistant Commissioners felt that a significant benefit of the Chipping Barnet constituency as proposed by the Conservative Party, the Liberal Democrats, John Bryant (initial submission), and Adam Gray was the inclusion of East Barnet and Brunswick Park wards, thereby addressing the local concerns from this area that had arisen in response to our initial proposals. While John Bryant's second counter-proposal, and counter-proposals from Peter Whitehead and Jonathan Stansby, included East Barnet ward in their Chipping Barnet successor constituency, Brunswick Park ward was not included. The Assistant Commissioners referred to the evidence of Theresa Villiers MP, who stated that 'it is important to ensure that Brunswick Park and East Barnet wards remain together. The communities in the two wards are heavily interconnected' (BCE-83552) – and gave examples of local ties between the two wards. The Assistant Commissioners therefore considered that counter-proposals that included the wards in different constituencies would break community ties in this area.
- 3.93 In assessing the different configurations presented for a Finchley-based constituency, the Assistant Commissioners recognised the strength of the Conservative Party's Finchley and Golders Green constituency, which would be unchanged from the existing constituency except for minor realignments with local government ward boundary changes. They noted that many other counter-proposals would transfer Childs Hill ward (or, in the case of the Liberal Democrats, both Childs Hill and Cricklewood wards) from Finchley and Golders Green to a Hampstead-based constituency that would comprise wards from the borough of Camden. While accepting that Barnet has too many electors to accommodate three whole constituencies, and therefore at least one Barnet ward must be joined with wards from a neighbouring borough, the Assistant Commissioners considered that including Childs Hill ward in a Hampstead-based constituency would break local ties in the Golders Green area and separate the two wards that encompass the Golders Green community (Childs Hill and Golders Green).
- 3.94 In light of their analysis of representations and counter-proposals, the Assistant Commissioners recommended that the Conservative Party's counter-proposal for the borough of Barnet – specifically, their three proposed constituencies of Chipping Barnet, Hendon, and Finchley and Golders Green – should be adopted. We agree with their recommendation, determining that the Conservative Party's counter-proposal best reflects the statutory factors for that borough.

Enfield, Hackney, Haringey, and Islington

- 3.95** We received very few representations overall for the borough of Enfield, perhaps because our initial proposals largely followed the existing pattern of constituencies in this borough.
- 3.96** In the borough of Haringey, we received significant opposition to our proposed transfer of West Green ward from the Tottenham constituency to the Hornsey and Wood Green constituency. Respondents including David Lammy, MP for Tottenham (BCE-74186, BCE-97570) and Reverend Keith Jackson (BCE-97572) argued that West Green ward is an integral part of the Tottenham community, especially since the ward includes Lordship Recreation Ground and the Broadwater Farm estate – site of the 1985 Broadwater Farm riot, which David Lammy MP described as ‘a terrible but fundamentally important part of Tottenham’s history’ (BCE-74186). Although representations were focused on West Green ward, some respondents such as Joseph Nicholas (BCE-97573) and BCE-65585 also opposed the transfer of White Hart Lane ward from the Tottenham constituency to the Hornsey and Wood Green constituency, particularly the Tower Gardens Conservation Area located in the southeastern part of the ward. Respondents noted that the conservation area has been part of the Tottenham constituency since its construction in 1900, and the streets are named after historical figures associated with Tottenham.
- 3.97** A number of representations suggested that we should keep West Green ward in the Tottenham constituency, and instead transfer Harringay ward to the Hornsey and Wood Green constituency. While acknowledging that Harringay ward is separated from the Hornsey area by the East Coast Main Line railway, respondents cited community ties between Harringay and Hornsey, and noted that residents on either side of the railway line use the same stations. Some respondents such as BCE-53134, Keir Hopley (BCE-64067), and David Lammy MP described a shared character and similar demographics between Harringay ward and neighbouring areas to its west and north. The Labour Party proposed swapping West Green and Harringay wards in their counter-proposal, and a similar approach was taken by the Liberal Democrats, who retained West Green ward in their Tottenham constituency and included Harringay ward in their Hornsey and Highgate constituency.
- 3.98** Alternative suggestions for the Tottenham constituency included splitting West Green and/or White Hart Lane wards between the Tottenham constituency and the Hornsey and Wood Green constituency, noting that the westernmost areas of both wards share some affinity with the Wood Green community. David Lammy MP advocated splitting both West Green and White Hart Lane wards, but said ‘If the Commission are not minded to support the split ward proposal, I would encourage them to support a straight swap of West Green ward for Harringay ward ... It is clear to me that, at the very least, the Broadwater Farm estate must remain a part of the Tottenham constituency...’ (BCE-74186).

- 3.99 The Conservative Party proposed retaining West Green ward wholly within their Tottenham constituency, as well as Haringey ward, and splitting White Hart Lane ward between their Tottenham constituency and their Enfield South and Wood Green constituency. They noted: 'As wards in Haringey are prospective polling district data is not available. We would use The Roundway along with a short section of the A10 south of the River Moselle as a clear boundary line between these constituencies. This ensures the whole of the Tower Gardens Estate is kept together in the Tottenham constituency' (BCE-86589). The Liberal Democrats also proposed retaining West Green ward wholly within their Tottenham constituency, but transferred the whole of White Hart Lane ward to their Southgate and Wood Green constituency. John Bryant's first submission included both West Green and White Hart Lane wards wholly within a Tottenham constituency, and transferred Haringey ward to a Hornsey constituency. John Bryant also proposed a Southgate and Wood Green constituency bearing resemblance to the Liberal Democrats' proposal, and the Assistant Commissioners noted that a number of other counter-proposals joined the Southgate area (borough of Enfield) with the Wood Green area (borough of Haringey) – such as counter-proposals from the Haringey Liberal Democrats (BCE-84163) and BCE-85393. Some respondents, however, voiced opposition to those counter-proposals that paired Southgate and Wood Green. For example, Catherine West, MP for Hornsey and Wood Green (BCE-88540, BCE-97553), argued that Wood Green is the 'civic capital' of Haringey and has strong community ties with the rest of Haringey, not with Southgate, which is in a different borough.
- 3.100 Our proposed inclusion of the two Hackney wards of Brownswood and Woodberry Down in the Tottenham constituency was almost unanimously opposed by local residents and the London Borough of Hackney (BCE-95993, BCE-96008). Respondents contended that our initial proposals would break local ties between Woodberry Down and Stamford Hill West wards in particular, and several respondents argued that transferring Woodberry Down to a Haringey-based constituency would potentially create administrative and funding difficulties for the Woodberry Down regeneration project. Regarding Brownswood ward, some local residents such as BCE-93691 said that if the ward has to be moved from its current constituency, it would be better suited to the Islington North constituency, since Brownswood shares many local services and concerns with neighbouring areas in Islington North. Conversely, the Liberal Democrats supported our initial proposals, stating: 'We agree with [the Commission's] transfer of Woodberry Down and Brownswood which are physically separated from most of Hackney by Clissold Park and the Woodberry Wetlands and reservoirs' (BCE-80979).

- 3.101** Elsewhere in the borough of Hackney, we received notable opposition to our proposed transfer of Dalston ward from the Hackney North and Stoke Newington constituency to the Islington North constituency. Respondents argued that Dalston ward is the ‘heart’ of Hackney and contains some key Hackney institutions – both cultural and commercial – as well as a stretch of Kingsland Road that runs north-south through the borough. Concern was expressed over the ward becoming an orphan ward in an Islington constituency. We received responses from local residents (such as BCE-90277), the London Borough of Hackney (BCE-78048), and the Hackney Green Party (BCE-97589), among others. Some representations and several counter-proposals, including the Liberal Democrats’ submission, proposed that De Beauvoir ward would make a better fit than Dalston ward with an Islington-based constituency. This would, however, leave De Beauvoir as an orphan ward in an Islington South constituency, and a number of respondents – including the Secretary of De Beauvoir Branch Labour Party (BCE-92915) – subsequently opposed those counter-proposals, arguing that De Beauvoir shares few links with Islington, but is strongly connected to its neighbouring Hackney wards.
- 3.102** We also received significant opposition to our inclusion of Tufnell Park ward, from the borough of Islington, as an orphan ward in the proposed Kentish Town and Bloomsbury constituency (which otherwise comprised wards from the borough of Camden). Tufnell Park residents argued that they look to the borough of Islington, especially Holloway Road, for local services, and have few connections with Kentish Town or Camden in general. BCE-85000, for example, wrote that residents ‘identify as part of Islington’ and use the ‘Nags Head/Holloway Road area as their local neighbourhood’, further noting that the ward ‘contains a number of community facilities, many of which are linked to wider networks in Islington’. Conversely, Sir Keir Starmer, MP for Holborn and St Pancras (BCE-81604, BCE-93471) acknowledged that while it was not ideal for the Kentish Town and Bloomsbury constituency to include an orphan Islington ward, ‘there are strong community links with the Camden wards that it borders in the proposed constituency’ (BCE-81604).
- 3.103** The Green Party (BCE-83421, BCE-97484) put forward a counter-proposal covering parts of the boroughs of Hackney and Islington, which would retain Tufnell Park ward in an Islington North constituency, and transfer Junction ward (its northerly neighbour) to the Kentish Town and Bloomsbury constituency instead. Dalston ward would remain in the Hackney North and Stoke Newington constituency, and Brownswood ward would be transferred to the Islington North constituency. Consequently, Woodberry Down and Stamford Hill West wards would be included in the Tottenham constituency.

- 3.104** Our initial proposals for the City of London and Islington South constituency were greeted with a mixture of support and opposition, although most respondents were in opposition, arguing that the City of London should be kept in a constituency with the City of Westminster as currently. In terms of links between the ‘two cities’, respondents cited historical, religious, and ceremonial ties; shared professional services (notably in the financial, legal, and commercial sectors); culture and tourism hubs; a need for cooperation on security, intelligence, and policing; the shared riverside area; and transport links. The City of London Corporation (BCE-83944), among others, provided a detailed submission in opposition.
- 3.105** On the other hand, some residents in the north of the City of London area supported our initial proposals, arguing that they look to Islington for local services such as shopping, entertainment, and educational facilities. Respondents noted that five of the City’s most populated residential wards share a border with Islington, and Paul O’Brien (BCE-91670) summarised a recurring view among those in support of our initial proposals: ‘There appears to be a common misrepresentation of the City of London. Many comments appear to focus on the ‘image’ of the City of London as a financial centre rather than on City residents.’ Emily Thornberry, MP for Islington South and Finsbury (BCE-75567), supported our initial proposals, referring to existing cooperation between the City and Islington on matters of housing and education, alongside several transport, healthcare, and hospitality links. Meg Hillier, MP for Hackney South and Shoreditch (BCE-85522, BCE-97499), also supported our initial proposals, outlining ‘strong links’ between the City and Islington.
- 3.106** The Assistant Commissioners again recognised the interplay of a number of issues across the boroughs of Enfield, Haringey, Hackney, and Islington, and the finely balanced views and counter-proposals put forward by respondents.
- 3.107** When considering approaches to the boroughs of Haringey and Enfield, the Assistant Commissioners felt that the Conservative Party’s counter-proposal for Haringey had merit. They noted that the seven Hornsey wards to the west of the East Coast Main Line railway would be kept together in the Hornsey and Friern Barnet constituency, and although Friern Barnet ward would be included as an orphan ward, they were persuaded that at least the part of the ward lying south of the A406 road has close ties to the Muswell Hill area to its south. Representations from Friern Barnet ward, such as BCE-53038, BCE-58259, BCE-58308, and BCE-93643, described ties to the Hornsey / Muswell Hill area to the south, or to the Finchley area to the west, rather than to High Barnet in the north. However, the Assistant Commissioners also noted opposition to the inclusion of Friern Barnet ward in a Hornsey-based constituency from local ward councillors (BCE-74013, BCE-80741) and the Liberal Democrats. Councillor Barry Rawlings (BCE-80741), for example, wrote that the Conservative Party proposal made ‘no sense’ since Friern Barnet ward extends ‘well away from any

part of Haringey with no community ties whatsoever. The schools, faith centres and community organisations here are providing services for Barnet residents. The main arterial road links with Whetstone and then on to High Barnet.' The Liberal Democrats contended that 'Friern Barnet ward orients east-west and most residents will look to Woodhouse Rd for local amenities alongside their neighbours in Woodhouse ward' (BCE-94859).

3.108 The Assistant Commissioners observed that the Conservative Party proposed a compact Tottenham constituency very similar to the existing one, which would not include the two Hackney wards of Brownswood and Woodberry Down. They acknowledged the benefits of the Conservative Party's proposed split of White Hart Lane ward, in keeping the Tower Gardens Conservation Area in the Tottenham constituency, but they noted that other counter-proposals would not require a ward split in Haringey.

3.109 Although proposing to cross the borough boundary between Haringey and Enfield, as did many counter-proposals, the Conservative Party presented an arrangement for the borough of Enfield that was notably different to both our initial proposals and to several of the other counter-proposals received. The Assistant Commissioners considered that the Conservative Party proposals for Enfield would result in significant disruption to the existing constituencies and would break local ties in the Edmonton area (by separating Haselbury ward from Lower Edmonton and Edmonton Green wards) and in the Southgate area (by including Palmers Green and Arnos Grove wards in a different constituency to central Southgate). While acknowledging the support for the Conservative Party's proposed Enfield West and Southgate constituency from Councillor Alessandro Georgiou (BCE-97606) and BCE-96412, the Assistant Commissioners did not find compelling evidence to justify the significant proposed changes to the existing Enfield constituencies. The Liberal Democrats and the Labour Party also commented on the disruptive nature of the Conservative Party's proposals for this borough, including the division of the Edmonton community.

- 3.110** The Assistant Commissioners felt that the Liberal Democrats' counter-proposal for Haringey, although different to the Conservative Party's, also had merit. While presenting a less compact Tottenham constituency than the Conservative Party, the Liberal Democrats took the same approach as the Labour Party in simply swapping West Green ward with Harringay ward, therefore enabling West Green ward to remain in the Tottenham constituency. Harringay ward would consequently be linked with the Hornsey wards to the west of the railway line in a Hornsey and Highgate constituency that would include Highgate ward from Camden. In arguing for the inclusion of Highgate as an orphan ward, the Liberal Democrats highlighted that Highgate village is itself divided between the boroughs of Haringey and Camden, with the borough boundary running along the village high street. The Assistant Commissioners agreed that there was logic in uniting all of Highgate in one constituency, and noted the representations from the Highgate Neighbourhood Forum (BCE-75096), the Highgate Conservation Area Advisory Committee (BCE-85815), the Highgate Society (BCE-79895), and Louise Lewis (BCE-80535), which all argued in favour of such an outcome.
- 3.111** Similarly to the Conservative Party, the Liberal Democrats proposed a constituency joining the Wood Green area of Haringey with parts of the borough of Enfield. The Assistant Commissioners considered, however, that the Liberal Democrats' solution overall for Enfield would better reflect the statutory factors than the Conservative Party's solution, with less change to existing constituencies and fewer local ties broken. They observed that the Liberal Democrats' proposed Enfield North constituency would be unchanged from the existing Enfield North constituency except for realignment to prospective local government ward boundaries and the inclusion of Grange Park ward (currently in the Enfield Southgate constituency). They noted that we had received some representations, such as BCE-77509 and BCE-79379, actively advocating the inclusion of Grange Park ward in the Enfield North constituency, in order to unite more of Enfield town centre in the same constituency.
- 3.112** Although feeling some concern over the inclusion of Winchmore Hill ward in an Edmonton-based constituency (as in the Liberal Democrats' counter-proposal), the Assistant Commissioners considered that an alternative option – swapping Winchmore Hill ward for Carterhatch ward in the Enfield North constituency – would present a less coherent solution. The Assistant Commissioners also noted that further, more extensive amendments to the Liberal Democrats' counter-proposal for Enfield were possible, but they considered that these would not present better solutions overall. Some counter-proposals, such as those from Peter Whitehead, Jonathan Stansby, and Adam Gray, proposed a constituency crossing the Enfield-Haringey boundary between Edmonton and Tottenham, rather than between Southgate and Wood Green. However, the Assistant Commissioners observed that this approach would divide the Tottenham community and the Wood Green community.

- 3.113** Turning their attention further south in the North Central sub-region, the Assistant Commissioners considered that the Conservative Party's counter-proposal would present significant disruption to existing constituencies in the borough of Islington: the two existing Islington constituencies would essentially be divided east-west, resulting in somewhat incoherent new constituencies and breaking local ties in a number of areas. The Conservative Party's proposed Islington South East constituency would include two non-contiguous wards from the borough of Hackney (Clissold and Hoxton West); the Assistant Commissioners considered that the inclusion of these wards would break local ties in the Stoke Newington area and the Hoxton area, and since the wards are not adjacent to one another, the impression and consequences could be analogous to two orphan wards. The Assistant Commissioners additionally noted that the Conservative Party's proposed Holborn and St Pancras constituency, in the borough of Camden, would include an orphan ward (Clerkenwell) from the borough of Islington.
- 3.114** In contrast to the Conservative Party counter-proposal, the Liberal Democrats presented a pattern of constituencies in the borough of Islington much closer to the existing arrangement: the existing Islington North constituency would remain wholly unchanged, and the existing Islington South and Finsbury constituency would remain unchanged save for the addition of De Beauvoir ward as an orphan ward from the borough of Hackney. The Assistant Commissioners noted that the existing Islington South and Finsbury constituency falls under the permitted electorate range and therefore needs to gain one ward. While any orphan ward is not ideal, and acknowledging the opposition from some De Beauvoir residents to being joined with an Islington constituency, the Assistant Commissioners felt that the Liberal Democrats provided sound reasoning for joining De Beauvoir ward to Islington South: 'This is a ward of a similar residential character and built environment to the Islington wards to the west sharing the N1 post code. It borders Islington to the north and west and the Regents Canal to the south – so is relatively separated from the rest of Hackney ... [We] consider this to be a less incongruous expansion of Islington South than the addition of the City of London' (BCE-80979).
- 3.115** While considering that there was some strength in the arguments in support of our proposal to join the City of London in a constituency with Islington, the Assistant Commissioners recognised that most respondents were against this proposal on the grounds that it would break longstanding community ties between the City of London and Westminster. They further recognised that keeping the City of London with Westminster would better reflect the existing constituency arrangement in this area. Therefore, they were persuaded that the City of London should be included in a Westminster-based constituency rather than an Islington-based constituency.

- 3.116** The Liberal Democrats proposed the same Hackney North and Stoke Newington constituency as our initial proposals, and their Hackney South and Shoreditch constituency included Dalston ward – thereby keeping the latter within a Hackney constituency. The Assistant Commissioners noted that several other counter-proposals, such as those from John Bryant, Peter Whitehead, Jonathan Stansby, Adam Gray, and Robert Young (BCE-57009) presented exactly the same arrangement as the Liberal Democrats for Islington and Hackney. Adam Gray provided further reasoning for joining De Beauvoir ward to an Islington constituency: ‘De Beauvoir Town is a continuation of the Islington Canalside; is a continuation of the street pattern in adjoining Canonbury ward and is seamlessly connected to this part of Islington’ (BCE-61555).
- 3.117** The Assistant Commissioners assessed the Green Party’s counter-proposal for the boroughs of Hackney and Islington. They noted that this counter-proposal would address representations from Dalston ward, by keeping it in a Hackney constituency, and would also pay heed to comments from Brownswood ward by transferring it to the Islington North constituency rather than the Tottenham constituency. However, they considered that the separation of Stamford Hill West ward from its neighbouring Springfield ward would notably divide the Stamford Hill community. They additionally considered that the inclusion of Junction ward rather than Tufnell Park ward in the Kentish Town and Bloomsbury constituency would not necessarily represent an improvement on our initial proposals. Looking more widely, the Assistant Commissioners noted that the Green Party’s counter-proposal covered only four constituencies within the pattern of our initial proposals and therefore would not address issues elsewhere in the sub-region.
- 3.118** In light of their analysis of representations and counter-proposals for the boroughs of Enfield, Hackney, Haringey, and Islington, the Assistant Commissioners recommended that the Liberal Democrats’ counter-proposal for constituencies in the boroughs of Hackney and Islington should be fully adopted – namely, their four proposed constituencies of Hackney North and Stoke Newington, Hackney South and Shoreditch, Islington North, and Islington South. Joining Hackney with the borough of Haringey, the Assistant Commissioners also recommended that the Liberal Democrats’ counter-proposal for the Tottenham constituency should be adopted (aligning with the Labour Party counter-proposal for Tottenham): including West Green ward in the constituency in place of Harringay ward, and transferring White Hart Lane ward to a constituency with the Wood Green area. Turning to Enfield, the Assistant Commissioners recommended that the Liberal Democrats’ counter-proposal for the three constituencies of Enfield North, Enfield South, and Southgate and Wood Green should be adopted. However, they recommended that the Enfield South constituency should instead be called Edmonton, since it encompassed all the Edmonton wards and was a clear successor to the existing Edmonton constituency.

- 3.119** The Assistant Commissioners concluded that the Liberal Democrats' solution for Enfield, Hackney, and Islington would better reflect existing constituencies than the Conservative Party's solution for these boroughs, and overall provided a stronger solution against the statutory factors. While acknowledging that the Conservative Party's Tottenham constituency was potentially more attractive than the Liberal Democrats', by virtue of it being contained wholly within the borough of Haringey and presenting less change from the existing Tottenham constituency, the Assistant Commissioners did not consider its advantages to outweigh the consequential disruption to Enfield and Islington in the Conservative Party's scheme. While also acknowledging that the Conservative Party's proposed split of White Hart Lane ward had merit in terms of community ties in the Tower Gardens Estate – and was numerically essential for the Conservative Party's arrangement in this area – the Assistant Commissioners did not consider that the case to split a ward here was sufficiently strong, especially since viable whole-ward alternatives were possible.
- 3.120** While acknowledging that there was some opposition to a constituency pairing Wood Green with Southgate, the Assistant Commissioners noted representation BCE-70966 from Joan Lyons, a resident of the southern part of Enfield borough, who emphasised community ties between Bowes and New Southgate wards (in the borough of Enfield) and Woodside and Bounds Green wards (in the borough of Haringey). Joan Lyons said it was 'crucial' that these four wards were in the same constituency. The Assistant Commissioners also considered that the borough boundary is very permeable between Bowes/New Southgate and Woodside/Bounds Green, and they observed that the Piccadilly Line links the Wood Green area all the way to the northern extent of the Southgate and Wood Green constituency in Cockfosters ward. They noted the arguments of Southgate resident BCE-81918, who said: 'I personally feel that should changes be made to Southgate, we are much more aligned to Wood Green, we are part of the Piccadilly line, the values are much more aligned, we share many common denominators such as schools, places of worship, cultural similarities and places to eat, drink and shop. We are also linked to Haringey with regards to local health services, the Council services and our links to the GLA/Mayoral seat.'

- 3.121** In determining a solution for the Hornsey area, the Assistant Commissioners recognised that the adoption of the Conservative Party counter-proposal for Barnet would necessitate Friern Barnet ward being included as an orphan ward in a constituency with wards to its south. They noted the balanced views received regarding Friern Barnet ward, and ultimately felt that there was sufficient justification for the ward to be included in a Hornsey-based constituency. However, given their decision to recommend the Liberal Democrats' counter-proposal for the Tottenham constituency and, more widely, the boroughs of Hackney and Islington, the Assistant Commissioners recognised that it would not be possible to recommend the Conservative Party's Hornsey and Friern Barnet constituency without some minor adjustments. The Assistant Commissioners therefore recommended a Hornsey and Friern Barnet constituency based on the Conservative Party proposal, but including Harringay ward in place of Highgate ward. While acknowledging that Harringay ward is situated on the other side of the East Coast Main Line railway to the Hornsey wards, the Assistant Commissioners noted the evidence provided on community ties between Harringay and Hornsey, as well as those counter-proposals from the Liberal Democrats and others that joined Harringay ward with the Hornsey area.
- 3.122** We accept the Assistant Commissioners' recommendations for constituencies in the boroughs of Enfield, Hackney, Haringey, and Islington, as outlined above. We accordingly propose revised constituencies of Edmonton, Enfield North, Hackney South and Shoreditch, Hornsey and Friern Barnet, Islington North, Islington South, Southgate and Wood Green, and Tottenham, and we propose maintaining the initial proposals for the Hackney North and Stoke Newington constituency.

Camden

- 3.123** In the north of the borough of Camden, we received strong opposition from local residents regarding our proposed Camden Town and St John's Wood constituency, and our proposed West Hampstead and Kilburn constituency, on the grounds that our initial proposals would divide the close-knit Hampstead community and create somewhat incoherent new constituencies with limited community relationships. Around 80 representations formed part of a campaign (BCE-96453) opposing our initial proposals and (implicitly) supporting the Conservative Party's counter-proposal for a Hampstead and Highgate constituency, which would include all of the Hampstead area and span Hampstead Heath to also include Camden's Highgate ward. Respondents referenced the former Hampstead and Highgate constituency, which existed from 1983 to 2010: 'Not only is the Hampstead and Highgate seat one that people remember, but it is one that many in our local communities relate to. In addition, there are numerous community groups which span Hampstead and Highgate...'

(BCE-96453). Oliver Cooper, councillor for Hampstead Town ward and Leader of the Opposition in the London Borough of Camden (BCE-85342, BCE-95493), provided detailed submissions opposing our initial proposals and setting out numerous arguments in support of the Conservative Party's counter-proposal.

- 3.124** Conversely, we did receive some support for our proposed West Hampstead and Kilburn constituency, with respondents arguing that the Kilburn High Road (the A5 / borough boundary between Camden and Brent) is a connector rather than a divider, and it is therefore important that the Kilburn High Road and its adjacent wards remain together in the same constituency. Those in support included Tulip Siddiq, MP for Hampstead and Kilburn (BCE-75612, BCE-97519) and local resident Steve Crabb (BCE-97522).
- 3.125** Despite the rationale for a constituency spanning the Kilburn High Road, many counter-proposals took an approach similar to the Conservative Party, treating the Kilburn High Road as a boundary and proposing a Hampstead-focused constituency. The Liberal Democrats proposed a Hampstead constituency that would include two wards from the borough of Barnet. John Bryant (both submissions), Peter Whitehead, Jonathan Stansby, and Adam Gray all proposed Hampstead-focused constituencies that would include one ward, Childs Hill, from the borough of Barnet – and would span Hampstead Heath to include Highgate ward.
- 3.126** 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 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. Sir Keir Starmer MP and Georgina Gould, on behalf of Camden Labour Group (BCE-83159), were among those expressing their support.
- 3.127** Several counter-proposals put forward a Holborn and St Pancras constituency based on the existing constituency, albeit without the Highgate area at the very north of the existing constituency. The Liberal Democrats, John Bryant, Peter Whitehead, Jonathan Stansby, and Adam Gray all proposed a Holborn and St Pancras constituency wholly within the borough of Camden (although made up of slightly different configurations of wards), while the Conservative Party proposed a Holborn and St Pancras constituency that would include one ward, Clerkenwell, from the borough of Islington.

- 3.128** The Assistant Commissioners were persuaded by representations and counter-proposals that a constituency based on the Hampstead and Highgate areas, and a constituency based on the existing Holborn and St Pancras constituency, would make a coherent solution for the borough of Camden. They noted that many counter-proposals for a Hampstead-focused constituency would include at least one ward from the borough of Barnet, but they considered this would break local ties in Golders Green, as previously discussed. Given their decision to recommend the Conservative Party's counter-proposal for Barnet, the Assistant Commissioners therefore acknowledged that they would not be able to recommend in full any of the counter-proposals from the Liberal Democrats, John Bryant, Peter Whitehead, Jonathan Stansby, or Adam Gray. The Assistant Commissioners subsequently recommended a Hampstead and Highgate constituency based on the Conservative Party's counter-proposal, excluding Gospel Oak and Haverstock wards, but including Kentish Town North ward and Haringey's Highgate ward.
- 3.129** While acknowledging that their recommended solution would make Highgate an orphan Haringey ward in a Camden-based constituency, the Assistant Commissioners saw considerable merit in those representations that argued for the uniting of the two Highgate wards (one in Camden; one in Haringey) in the same constituency, since the Highgate community spans the borough boundary. A number of Highgate organisations and residents stated in responses that Haringey's Highgate ward should be included in the Kentish Town and Bloomsbury constituency because the borough boundary between Haringey and Camden 'divides our community in two and ignores the shape of our historic neighbourhood. We believe Highgate should be located in an Inner London constituency i.e. Kentish Town and Bloomsbury as our links – culturally and practically – are to the South, to Camden...' (BCE-75096). Although not proposing to maintain our initial proposals for Kentish Town and Bloomsbury, the Assistant Commissioners considered that an essential point of the arguments presented by the aforementioned respondents would nevertheless be addressed by the inclusion of Haringey's Highgate ward in the Hampstead and Highgate constituency.
- 3.130** The Assistant Commissioners further noted the strong support in representations for the 'concept' of a Hampstead and Highgate constituency, given its historical precedent. They recognised that although Hampstead Heath could be seen to represent a geographic barrier between the Hampstead community and the Highgate community, respondents instead tended to view the Heath as a shared amenity, with residents on either side sharing similar local concerns. The Heath was therefore seen as a unifier rather than a divider. The Assistant Commissioners also noted the comments from Councillor Cooper, who pointed out that Hampstead and Highgate developed similarly as urban villages with strong commuting links to central London – therefore sharing a similar history –

and that the two areas share the 'Ham & High' local newspaper. Although there are few direct road links between Hampstead and Highgate, the Assistant Commissioners considered that the B519 provides a key linking route along the north of the Heath.

- 3.131** Finally, the Assistant Commissioners recommended a Holborn and St Pancras constituency based on the Liberal Democrats' proposed Holborn and St Pancras constituency, but including Gospel Oak ward in place of Kentish Town North ward. The Assistant Commissioners considered that their recommended Holborn and St Pancras constituency would reflect the shape of the existing constituency. They acknowledged that the separation of the two Kentish Town wards between the Hampstead and Highgate constituency and the Holborn and St Pancras constituency would not be desirable, but they noted the hard boundary of the Midland Main Line railway dividing at least part of Kentish Town North ward from Kentish Town South ward. When exploring alternative options for the area, the Assistant Commissioners observed that Primrose Hill ward could be included in the Holborn and St Pancras constituency in place of Gospel Oak ward, but concluded that this would result in greater change from the existing constituency arrangement. They also felt that the railway lines at the north of Gospel Oak ward and the east of Primrose Hill ward would provide identifiable constituency boundaries. Additionally, since the western part of Primrose Hill ward would likely identify with the Swiss Cottage / South Hampstead area, the Assistant Commissioners felt that this ward was better suited to the Hampstead and Highgate constituency; including Primrose Hill in the Holborn and St Pancras constituency would break local ties in South Hampstead.
- 3.132** We agree with the Assistant Commissioners' recommendations for a Hampstead and Highgate constituency and a Holborn and St Pancras constituency as outlined above.

North West London

- 3.133** Given our initial proposal to join the City of London in a constituency with Islington, and since most of the existing constituencies across the boroughs of Hammersmith and Fulham, Kensington and Chelsea, and Westminster have electorates beneath the permitted electorate range, our initial proposals involved some significant changes to the pattern of constituencies across these parts of London. This included: a Westminster and Chelsea East constituency that would cross the borough boundary between Kensington and Chelsea, and Westminster in the Knightsbridge area; a Kensington and Westbourne constituency that would cross the northernmost part of the borough boundary between Kensington and Chelsea, and Westminster; and a Fulham and Chelsea West constituency that would span the boroughs of Hammersmith and Fulham, and Kensington and Chelsea, as per the existing Chelsea and Fulham constituency.

- 3.134** In the borough of Brent, in addition to the two proposed constituencies crossing the A5 road, we proposed a Brent Central constituency to be realigned with prospective local government ward boundaries and changed by two wards from the existing Brent Central constituency. We also proposed a Kenton and Wembley West constituency that would include most of the area covered by the existing Brent North constituency, plus the two Kenton wards from the borough of Harrow. Elsewhere in Harrow, in addition to the Stanmore and Edgware constituency crossing the A5 road, we proposed a Harrow constituency very similar to the existing Harrow West constituency, but that would also include Wealdstone North ward.
- 3.135** The existing Ruislip, Northwood and Pinner constituency, and the existing Uxbridge and South Ruislip constituency, would be reconfigured under our initial proposals to align with prospective ward boundaries. Aside from this, the only change to these two constituencies would be the inclusion of Ickenham & South Harefield ward in the Uxbridge and South Ruislip constituency, to bring both constituencies within the permitted electorate range. Further south in the borough of Hillingdon, we proposed a Hayes and West Drayton constituency unchanged from the existing Hayes and Harlington constituency except for minor realignment with prospective local government ward boundaries.
- 3.136** In the boroughs of Hounslow and Richmond upon Thames (north), the three existing constituencies are all above the permitted electorate range. To bring the Twickenham constituency and the Feltham and Heston constituency within range, we proposed reducing them in size by one ward each. Whitton ward (from the Twickenham constituency) and Heston East ward (from the Feltham and Heston constituency) would consequently be included in our proposed Brentford and Isleworth constituency. The three Chiswick wards currently in the Brentford and Isleworth constituency were proposed to be included in a Hammersmith and Chiswick constituency, crossing the borough boundary from Hounslow to Hammersmith and Fulham.
- 3.137** In the borough of Ealing, our proposed Ealing North constituency would be unchanged from the existing constituency except for realignment with prospective ward boundaries. Walpole ward, currently in the Ealing Central and Acton constituency, would be included in our proposed Southall constituency to bring this constituency within the permitted electorate range. Our proposed Ealing Central and Acton constituency would cross the borough boundary between Ealing, and Hammersmith and Fulham, to include two wards from the north of the latter.

3.138 Our initial proposals for constituencies in the boroughs of Ealing, Hammersmith and Fulham, Harrow (except the eastern part of the borough), Hillingdon, Hounslow, and Richmond upon Thames (north) were fully supported by the Conservative Party (BCE-86589, BCE-96881, BCE-97483), the Labour Party (BCE-79496, BCE-95656, BCE-97485), and the Liberal Democrats (BCE-80979, BCE-94859, BCE-97487). The Conservative Party and the Liberal Democrats provided counter-proposals for Brent, the City of London, part of Harrow, Kensington and Chelsea, and Westminster. Other counter-proposals for the North West London area were provided by John Bryant (BCE-73747, BCE-94748), Adam Gray (BCE-61555), Peter Whitehead (BCE-78064), and Jonathan Stansby (BCE-89921), among others. We also received a number of localised counter-proposals covering a small number of constituencies or boroughs.

Kensington and Chelsea, and Westminster

3.139 Our initial proposals for 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. We received detailed submissions from Greg Hands, MP for Chelsea and Fulham (BCE-85525, BCE-97568), Felicity Buchan, MP for Kensington (BCE-82504, BCE-97521), Kensington, Chelsea & Fulham Conservative Association (BCE-77809, BCE-97525), local councillors, community representatives and organisations, and many others.

3.140 In response to our proposed division of the Chelsea area into Chelsea East and Chelsea West, many representations drew attention to the King's Road – the 'historic central artery' of Chelsea (BCE-65411) – being divided into two constituencies. Greg Hands MP contended that 'cutting the King's Road apart would be hugely detrimental to the continuity of both historic and cultural community ties' (BCE-85525). 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 Westminster. Respondents further noted that our proposals would divide several conservation areas and 'character areas' in Chelsea.

- 3.141** 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 & Albert Museum) would be included in a Westminster-based constituency, with ‘potentially harmful consequences’ according to the Directors of the three museums (BCE-85987). 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.
- 3.142** There was some support for our initial proposals, particularly for the Kensington and Westbourne constituency, from respondents including Kensington & Chelsea Labour Group of Councillors (BCE-81089) and Emma Dent Coad, former MP for Kensington (BCE-75590), but the evidence in support was limited compared to the evidence against our initial proposals.
- 3.143** Greg Hands MP and Felicity Buchan MP put forward an alternative proposal for constituencies of Chelsea and Fulham, and Kensington and Bayswater, which was the same as the Conservative Party’s counter-proposal. This counter-proposal would closely reflect the existing Chelsea and Fulham constituency, thereby keeping the Chelsea community together. The proposed Kensington and Bayswater constituency would keep the South Kensington community together, too, and link Kensington with the Westminster wards of Bayswater and Lancaster Gate rather than the three wards to the north of the borough. The counter-proposal was widely supported, and residents cited extensive community ties between the Notting Hill and Bayswater areas, noting that the borough boundary was far more porous here than further north. John Bryant, Robert Young (BCE-57009) and BCE-77883 presented the same arrangement as the Conservative Party for Chelsea and Fulham, and Kensington constituencies.
- 3.144** The Liberal Democrats proposed the same Chelsea and Fulham constituency as the Conservative Party, but joined Kensington with the two Westminster wards of Westbourne and Knightsbridge & Belgravia, rather than Bayswater and Lancaster Gate. Residents of Knightsbridge & Belgravia ward opposed this counter-proposal, arguing that their community ties were with south Westminster rather than Kensington. The Knightsbridge Neighbourhood Forum (BCE-82496) also stated, ‘it is important to us that our identity remains fully and firmly aligned to ‘Westminster’.’

- 3.145 Some representations expressed concern over the inclusion of the whole of Brompton & Hans Town ward in a Kensington-based constituency (as per the Conservative Party's and Liberal Democrats' counter-proposals), since 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. Respondents including the Milner Street Area Residents' Association (BCE-71353) and the Chelsea Society (BCE-69976) proposed that we split 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 balance the numbers. While noting that it was regrettable that the Hans Town area would not be included in a Chelsea constituency, Greg Hands MP and the Kensington, Chelsea & Fulham Conservatives (BCE-88510) did not support such a split-ward solution.
- 3.146 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 Westminster. The majority of counter-proposals presented a Cities of London and Westminster constituency based on the existing constituency, and therefore retaining the link between the City and Westminster. Some counter-proposals, for example those from Robert Young, BCE-83455, and BCE-83390, suggested that the City should be joined with wards from Camden as well as Westminster. These respondents cited cultural, business, and transport links between the two Camden wards of Bloomsbury, and Holborn & Covent Garden, and the surrounding areas in the City and Westminster.
- 3.147 Given the approach taken by many counter-proposals to treat the A5 road as a dividing line until the borough of Westminster, we received several proposals for a constituency crossing between the boroughs of Westminster and Brent – joining the most southern wards of Brent with the northwestern wards of Westminster, albeit in different configurations. The Conservative Party wrote in their initial submission: 'Although this involves breaking up Hampstead and Kilburn [existing constituency] we note again that the Brent-Camden border is the clear boundary of the A5 whereas the Brent-Westminster boundary runs along residential roads and there are clear ties between the Brent wards of Kilburn and Queens Park and the Westminster ward of Queen's Park (the latter of which contains the area known as West Kilburn)' (BCE-86589). The Liberal Democrats noted the 'strong transport routes' of the A404 (Harrow Road) and the Bakerloo Line linking Edgware Road in Westminster to Harlesden in Brent (BCE-80979).

- 3.148** Recognising the strength of opposition to our initial proposals in the borough of Kensington and Chelsea, and the quality of evidence received, the Assistant Commissioners carefully considered the counter-proposals provided to us. They concluded that the Conservative Party's 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 Conservative Party's proposal of which Westminster wards to include in the Kensington-based constituency (namely, Bayswater and Lancaster Gate) would make more sense in terms of community ties than the Liberal Democrats' alternative of Knightsbridge & Belgravia and Westbourne (particularly since those two wards are not adjacent). The Assistant Commissioners noted the suggestion for splitting 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 ward splitting since there was no wider benefit to be gained beyond the immediate location. In light of their analysis, the Assistant Commissioners recommended that the Conservative Party counter-proposal for the constituencies of Chelsea and Fulham, and Kensington and Bayswater, be adopted. We agree with their recommendation.
- 3.149** Before settling on a recommendation for a constituency joining the City of London with Westminster, the Assistant Commissioners acknowledged that the proposal for a constituency that would join the City with parts of Camden and Westminster presented some merit in terms of geographical shape and local ties. Since this suggestion would involve combining three local authorities in one constituency, however, and since it would not align with the new sub-regions, the Assistant Commissioners did not pursue this approach.
- 3.150** The Assistant Commissioners observed that, under the Conservative Party's counter-proposal, either Abbey Road ward or Church Street ward – both located directly to the east of the A5 – could be included in their Cities of London and Westminster constituency. The Conservative Party chose to include Abbey Road ward in their Cities of London and Westminster constituency, and Church Street ward in their Paddington and Kilburn constituency. John Bryant, on the other hand, proposed exactly the same arrangement as the Conservative Party, but swapped Abbey Road and Church Street wards. In defending their decision to include Church Street ward in the Paddington and Kilburn constituency, the Conservative Party asserted: 'The A5 between Church Street and Little Venice is almost entirely a shopping district which unites people on both sides of the road. To the north between Abbey Road and Maida Vale it is a clearer boundary often having housing tower blocks set back from the road' (BCE-86589). To help the Assistant Commissioners decide which was the most appropriate solution for Abbey Road and Church Street wards, they visited the area.

- 3.151** When walking around the boundary of Church Street ward, the Assistant Commissioners observed that the Marylebone Road (A501) provided an identifiable boundary along the south of the ward, the Chiltern Main Line railway provided a significant barrier along the northeastern part of the ward, and the Grand Union Canal similarly provided a clear geographical boundary along the north of the ward. The ward was therefore somewhat separated from the wards to its north, south, and east. In contrast, the Assistant Commissioners observed the shared community of St John's Wood between Abbey Road ward and Regent's Park ward to its east. Walking down the A5, the Assistant Commissioners noted that the road narrowed between Church Street ward and Little Venice ward to its west, with increasingly more shops and cafes on either side of the road, and a sense of community 'buzz'. The Assistant Commissioners therefore agreed with the Conservative Party and concluded that Church Street ward would fit better with the Paddington and Kilburn constituency, and Abbey Road ward with the Cities of London and Westminster constituency.
- 3.152** Accordingly, the Assistant Commissioners recommended the adoption of the Conservative Party counter-proposal for these two constituencies. 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. The Assistant Commissioners considered that, while Paddington was a former metropolitan borough covering what is now the northwest portion of Westminster, the proposed constituency would not include the Paddington basin or the area around Paddington station. Similarly, the Assistant Commissioners considered that it would not be appropriate to include Kilburn in the name of the constituency, since the constituency would not encompass substantial parts of Kilburn. In light of the arguments presented to us, we agree with the Assistant Commissioners' recommendations for a Queen's Park and Little Venice constituency, and a Cities of London and Westminster constituency, as outlined above.

Brent and Harrow

- 3.153** Our initial proposals for the borough of Brent generated relatively few comments from Brent residents, but some common themes emerged. Respondents opposed the inclusion of Alperton ward in the Brent Central constituency, on the grounds that Alperton would be almost completely separated from the rest of the proposed constituency by multi-track overground and underground railway lines, and Wembley Brook. Representations from Brent North Constituency Labour Party (BCE-82794, BCE-95197), local councillors (BCE-83566, BCE-83254), and residents argued that Alperton's connections are northwards to Wembley Central and Sudbury wards, rather than eastwards across the railway lines. They contended that the ward would therefore be geographically isolated – and numerous local ties would be broken – if it were to be included in the Brent Central constituency. Brent North Constituency Labour Party wrote: 'We would submit that placing [Alperton ward's] 7,480 residents in a constituency from which they are physically and geographically isolated and where no pedestrian movement is either possible or feasible, represents a serious failure to respect natural boundaries' (BCE-95197).
- 3.154** Some representations also contended that our initial proposals would break local ties across the wider Wembley area. Local councillor BCE-84435, for example, provided a detailed submission outlining that our initial proposals would divide Sudbury and Wembley Central wards from their neighbouring Wembley wards (Wembley Hill, Wembley Park, and Tokyngton) to the east. BCE-84435 illustrated that the Wembley wards share many community, charitable, and religious organisations; public transport links; educational ties; and leisure amenities – links that would be broken under our initial proposals. Brent North Constituency Labour Party similarly recognised the 'interconnectedness and congruity' of the Wembley wards and argued for the creation of a Wembley constituency (BCE-82794).
- 3.155** Several counter-proposals put forward two constituencies that would be wholly contained within the borough of Brent, based on the areas of Wembley and Willesden. The Liberal Democrats and John Bryant proposed exactly the same arrangement, with a compact Wembley constituency that would unite all the core Wembley wards (including Alperton), and a more geographically expansive Willesden-based constituency that would extend north to Kingsbury ward. Adam Gray, Peter Whitehead, Jonathan Stansby, and Lewis Baston (BCE-81615) also proposed a Wembley constituency identical to the Liberal Democrats' and John Bryant's, although with different configurations for the Willesden constituency. The Conservative Party, on the other hand, proposed a Brent North constituency and a Brent Central constituency based more closely on the existing Brent

North and Brent Central constituencies. Barry Gardiner, MP for Brent North (BCE-83032), Brent North Constituency Labour Party, and Dawn Butler, MP for Brent Central (BCE-75112) also made suggestions for constituencies in the borough of Brent. Dawn Butler MP expressed concern that the Harlesden community would be divided under our initial proposals, with Harlesden & Kensal Green ward, and Roundwood ward included in different constituencies. Dawn Butler MP's counter-proposal for a Brent Central constituency therefore would keep these two wards together, but it did not address the knock-on consequences for other constituencies in Brent and the surrounding boroughs. The counter-proposals from Barry Gardiner MP and Brent North Constituency Labour Party similarly provided isolated solutions for areas of Brent without addressing the knock-on consequences.

- 3.156** 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 including Bob Blackman, MP for Harrow East (BCE-77996, BCE-97660), Councillor Kanti Rabadia (BCE-84508), and many local residents, argued that the borough boundary between 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 Harrow wards (and vice versa), rather than in Brent. They contended, therefore, that the initial proposals would break local ties in the southeastern part of Harrow.
- 3.157** The Conservative Party, the Liberal Democrats, and John Bryant provided counter-proposals for Harrow and Brent that would keep Kenton East and Kenton West wards in a Harrow constituency. All three respondents proposed a Harrow East constituency that would include all the wards in the existing Harrow East constituency, except for Wealdstone North ward, together with Queensbury ward as an orphan ward from Brent (the Liberal Democrats named this constituency Stanmore and Queensbury, but the composition was identical). Respondents noted that the borough boundary between Brent's Queensbury ward and Harrow's Edgware ward is porous, running along residential roads, and the Jubilee Line runs from Stanmore down through Queensbury ward, providing a key transport link between the areas of the proposed constituency. Bob Blackman MP described Queensbury ward as a 'natural geographic extension' to the Harrow East constituency (BCE-77996). There was notable support for this counter-proposal in local representations. Other counter-proposals from Adam Gray, Peter Whitehead, and Jonathan Stansby joined the Stanmore and Queensbury areas too, but in a narrower and more elongated constituency that would divide Kenton East ward from Kenton West ward.

- 3.158** In determining a solution for the boroughs of Brent and Harrow, the Assistant Commissioners were persuaded that the Harrow East constituency as proposed by the Conservative Party, the Liberal Democrats, and John Bryant would address the concerns from residents of 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 Queensbury ward as an orphan ward from 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. We concur with their recommendation.
- 3.159** Since the composition of our initially proposed Harrow constituency was well supported, and represented little change from the existing constituency, the Assistant Commissioners did not recommend any revisions to the composition of this constituency. However, they recommended naming the constituency Harrow West, as per the current name. They considered that the name Harrow West should be retained because the constituency would remain largely unchanged, and it would make sense to include a compass point distinguisher from the Harrow East constituency. We agree with the Assistant Commissioners' recommendation.
- 3.160** The Assistant Commissioners recognised that the Liberal Democrats and Conservative Party counter-proposals for the two constituencies wholly within Brent could be interchanged without affecting the wider pattern of constituencies. They noted that the Conservative Party's counter-proposal would reflect the existing Brent constituencies more closely than the Liberal Democrats' counter-proposal, but also that under the former, 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 convinced by the evidence provided in representations that this arrangement would break local ties in Alperton and would not reflect the geography of the area.
- 3.161** When assessing the Liberal Democrats' counter-proposal, the 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 the Liberal Democrats would use the River Brent and an extensive portion of the A4140 road as a boundary between their Wembley, and Willesden and Kingsbury constituencies, which appeared a logical geographic boundary. They acknowledged that under both the Conservative Party's and the Liberal Democrats' proposals for Brent, Harlesden & Kensal

Green ward would be included in a different constituency to Roundwood ward, 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.

- 3.162** On balance, the Assistant Commissioners considered that the Liberal Democrats' counter-proposal for Brent would better reflect the statutory factors overall than the Conservative Party's counter-proposal, and therefore they recommended the adoption of the Liberal Democrats' counter-proposal for a Wembley constituency, and a Willesden and Kingsbury constituency. They recommended, however, that the Willesden and Kingsbury constituency simply be named Willesden, since it would not encompass the whole extent of the Kingsbury community. We agree with the Assistant Commissioners' recommendations for the borough of Brent, and accordingly we propose revised constituencies of Wembley and Willesden.

Hillingdon

- 3.163** In the north of the borough of Hillingdon, we received some opposition to the division of the Harefield community, since our initial proposals included Harefield Village ward and Ickenham & South Harefield ward in different constituencies: the former in the Ruislip, Northwood and Pinner constituency, and the latter in the Uxbridge and South Ruislip constituency. Respondents such as BCE-63179 argued that our proposals would split Harefield village, emphasising that Harefield is a 'true' village surrounded by countryside.
- 3.164** Counter-proposals from John Bryant and Howard Erdunast (BCE-66754) would unite Harefield by including Harefield Village ward together with Ickenham & South Harefield ward in the Uxbridge and South Ruislip constituency, and consequently transferring Ruislip Manor ward to the Ruislip, Northwood and Pinner constituency. Howard Erdunast provided an additional option for uniting Harefield: this would transfer both Harefield Village, and Ickenham & South Harefield wards to the Ruislip, Northwood and Pinner constituency, and include Ruislip Manor and Eastcote wards in the Uxbridge and South Ruislip constituency. Overall, however, Howard Erdunast submitted that the former option was superior. While acknowledging that our initial proposals would divide Harefield, the Conservative Party and the Liberal Democrats contended that the alternatives outlined above would result in more disruption to the existing constituencies, and the Conservative Party argued that including Ruislip Manor ward in a different constituency to South Ruislip ward would break ties between these two areas. Therefore, these political parties supported our initial proposals, as did the Labour Party and the Green Party.

- 3.165** The Assistant Commissioners saw merit in the alternative presented by John Bryant and Howard Erdunast that united both Harefield wards in the Uxbridge and South Ruislip constituency, and transferred 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 the Conservative Party's 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. We accept the Assistant Commissioners' recommendation, but would particularly welcome further views on the balance of local ties in these areas.
- 3.166** Further south in the borough of Hillingdon, the 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. 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, the Assistant Commissioners recommended that its existing name should be retained in light of this local support. We agree with their recommendation.

Richmond upon Thames (north) and Hounslow

- 3.167** In the borough of Richmond upon Thames (north), residents of 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 Heathfield ward. Despite being separated by a railway line, respondents referred to 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 such as BCE-57722

said that they identified with the Twickenham area, in the borough of Richmond upon Thames, rather than Hounslow. We received representations from the Leader of the London Borough of Richmond upon Thames (BCE-83785), Whitton ward councillors (BCE-79339), and Twickenham Conservative Association (BCE-85197), among many others.

- 3.168** Some representations proposed ways in which Whitton ward could remain in the Twickenham constituency. For example, the Twickenham Conservative Association proposed transferring St Margaret's & North Twickenham ward to the Brentford and Isleworth constituency instead of Whitton ward, and other respondents proposed transferring Heathfield ward instead of Whitton ward. Councillor Jo Humphreys (BCE-97659) proposed splitting both St Margaret's & 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. BCE-52884 proposed splitting both Whitton and Heathfield wards between the Twickenham, and Brentford and Isleworth constituencies.
- 3.169** A small number of representations did, however, support our initial proposals for the Brentford and Isleworth constituency. For example, Hounslow South ward councillors (BCE-84368, BCE-80323) and Ruth Cadbury, MP for Brentford and Isleworth (BCE-81536, BCE-97643) accepted the inclusion of Whitton ward in the constituency and noted strong community links between Hounslow South and Whitton wards.
- 3.170** The Assistant Commissioners considered that the evidence in opposition to our initial proposals for Whitton ward was more compelling than that in support. They therefore sought to identify a solution that would enable Whitton ward to remain in the Twickenham constituency without breaking ties elsewhere. They noted, however, that proposals to transfer St Margaret's & North Twickenham ward to the Brentford and Isleworth constituency instead of Whitton ward were not numerically possible: this would bring the Brentford and Isleworth constituency over the permitted electorate range. While it was numerically viable to transfer Heathfield ward to the Brentford and Isleworth constituency instead of Whitton ward, the Assistant Commissioners considered that this would not solve the issue, since the Whitton community would still be divided – and Heathfield ward is more geographically distant from the Hounslow area than Whitton ward. The Assistant Commissioners also considered that splitting Whitton and/or Heathfield wards would not provide a better solution than our initial proposals, since the Whitton community as a whole would still be divided between constituencies.

- 3.171** Splitting St Margaret's & North Twickenham ward and Twickenham Riverside ward between the Twickenham constituency and the Richmond Park constituency, as proposed by Councillor Humphreys, presented a potentially attractive solution in terms of community ties: both Whitton and Heathfield wards could remain in the Twickenham constituency, and there was evidence of ties between Richmond and the eastern parts of Twickenham. The Assistant Commissioners observed, however, that this proposal would bring the Richmond Park constituency over the permitted electorate range, and it would disregard the widely supported sub-regional boundary of the River Thames.
- 3.172** The Assistant Commissioners noted that it was possible to transfer either Heathfield ward or Hampton North ward to the Feltham and Heston constituency, to enable Whitton to remain in Twickenham, but that this would necessitate knock-on changes to the Feltham and Heston, and Brentford and Isleworth constituencies, resulting in greater disruption to existing constituencies and the breaking of local ties in parts of Hounslow and Heston. A small number of counter-proposals provided further options for keeping Whitton in the Twickenham constituency, but again these would result in significant disruption elsewhere, which the Assistant Commissioners did not feel was justifiable.
- 3.173** Following their analysis, and further noting that our proposed Feltham and Heston constituency was well supported in representations, the 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. We agree with their recommendations.

Ealing, and Hammersmith and Fulham

- 3.174** 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 such as Ann Chapman (BCE-97629) and BCE-73900 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 / Ealing West in the name. Some respondents, while opposing the name, did however support the inclusion of Walpole ward in the Southall constituency. Councillor Gareth Shaw (BCE-75932, BCE-97628) and BCE-79646, for example, described Walpole's close ties with its neighbouring Hanwell Broadway and Northfield wards. Councillor Shaw drew attention to Northfield Avenue, which is currently divided between the

Ealing Southall and Ealing Central and Acton constituencies: Councillor Shaw argued that Walpole and Northfield wards ‘share a common identity through the amenities of Northfield Avenue (B452) that provides a distinct ‘town centre’ style road of local independent shops, cafes, pubs and restaurants ... These proposals will unite this road into a single parliamentary constituency again’ (BCE-75932).

- 3.175** Response to our initially proposed Ealing Central and Acton constituency was mixed, with some objections to the inclusion of the two Hammersmith and Fulham wards of College Park & Old Oak, and Wormholt in the constituency. Residents from the southeastern 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, respondents such as Councillor Hitesh Tailor (BCE-85082), the Ealing Central and Acton Labour Party (BCE-82608) and Rupa Huq, MP for Ealing Central and Acton (BCE-81043, BCE-97639) cited many shared local ties – including transport links, shopping facilities, and community organisations – across the borough boundary between Ealing, and Hammersmith and Fulham. The Ealing Central and Acton Labour Party noted that Old Oak Common Lane, which acts as the borough boundary, is in fact 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.
- 3.176** 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 prospective local government ward boundaries.
- 3.177** Some counter-proposals, such as those from Peter Whitehead and BCE-85271, suggested maintaining the existing Ealing Central and Acton constituency unchanged (except for minor realignment with prospective local government ward boundaries) – enabling Walpole ward to remain in the constituency, and enabling College Park & Old Oak ward and Wormholt ward to be part of a Hammersmith-based constituency. A counter-proposal from the Ealing Central and Acton Conservative Association (BCE-81503) put forward 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 two ward splits.

- 3.178** The Assistant Commissioners recognised the merit in retaining an existing constituency unchanged, and noted that these counter-proposals would address concerns from Walpole ward and the two northerly Hammersmith and Fulham wards. They observed, however, that such an approach would create knock-on effects throughout all the other boroughs in the North West London sub-region, and would result in some significant changes to the existing pattern of constituencies elsewhere. More locally, they observed that this approach would necessitate change to the Ealing North constituency, which could otherwise be left unchanged except for local government boundary realignment. They did not consider that there was sufficient justification for splitting Heston East and Heston West wards, as proposed by the Ealing Central and Acton Conservative Association.
- 3.179** When assessing the arguments in opposition to Walpole ward being included in the Southall constituency, the Assistant Commissioners considered that reverting the name of this constituency to Ealing Southall would go some way to recognising the identity of Walpole residents, as well as Hanwell Broadway and Northfield residents, who feel part of the Ealing community. Regarding the inclusion of College Park & Old Oak ward and Wormholt ward in the Ealing Central and Acton constituency, the Assistant Commissioners were persuaded by the evidence of community ties between these wards and their neighbouring Ealing wards – and they noted that some representations had drawn attention to the precedent of the former Ealing, Acton and Shepherd’s Bush constituency (1997 – 2010), which spanned Ealing, and Hammersmith and Fulham boroughs. They were not persuaded by the arguments that Old Oak should be included in the name of the constituency.
- 3.180** We received strong support for our initially proposed Hammersmith and Chiswick constituency, with respondents citing many local ties and transport connections between the Hammersmith and Chiswick areas. A number of respondents, however, supported an amendment to our initial proposals: moving Southfield ward (in the borough of Ealing) to the Hammersmith and Chiswick constituency, and moving both White City and Shepherd’s Bush Green wards (in the borough of Hammersmith and Fulham) to the Ealing Central and Acton constituency (see BCE-85074, for example). This could be achieved with no knock-on consequences to the neighbouring constituencies. The counter-proposal was put forward in order to unite Southfield ward with the three other Chiswick wards, since Southfield residents (particularly in Bedford Park) contended that they have ties with Chiswick and feel part of the Chiswick community. Andy Slaughter, MP for Hammersmith (BCE-96868), opposed this counter-proposal, however, on the grounds that it would create a three-borough constituency. The Assistant Commissioners considered that the counter-proposal had merit in terms of local ties, but they concluded that the local ties arguments would not outweigh the inconveniences attendant on a constituency spanning three local authorities.

- 3.181** In light of their assessments across the boroughs of Ealing and Hammersmith and Fulham, the 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. We agree with the Assistant Commissioners' recommendations.
- 3.182** Overall, for the North Central London sub-region and the North West London sub-region, we note that our revised proposals would reduce the number of constituencies crossing borough boundaries from 18, in our initial proposals, to 14. We also note, however, that our revised proposals would increase the number of orphan wards from three to five. Given the challenges and the potential for wide-ranging 'domino effects' in these parts of north London, we consider that our revised proposals would nonetheless produce a balanced and coherent pattern of constituencies overall better reflecting the statutory factors.

South West London

- 3.183** As previously described, our initial proposals treated South Central and South West London as one large sub-region. There are currently 20 constituencies across these parts of London,¹⁷ and our initial proposals were for 21 constituencies. This section of the report focuses on the South West area.
- 3.184** In the borough of Merton, our initially proposed Mitcham and Morden constituency was based on the existing constituency, but would gain Cannon Hill ward in place of Longthornton ward (which would be included in our Croydon North constituency). Our initial proposals for the Wimbledon constituency would include two wards from the borough of Kingston upon Thames.
- 3.185** We proposed a Kingston and Surbiton constituency that would be wholly contained within the borough of Kingston upon Thames, and a Richmond Park constituency that would – as currently – span the boroughs of Richmond upon Thames (south) and Kingston upon Thames, but lose Coombe Vale ward.
- 3.186** We were able to treat Sutton and Wandsworth as coterminous boroughs, proposing two and three constituencies, respectively, that would be wholly contained within each borough's boundaries. We proposed a Carshalton and Wallington constituency and a Sutton and Cheam constituency, in the borough of Sutton, that would be changed only slightly from the existing constituencies to realign with prospective ward boundaries. We proposed splitting Fairfield ward in Wandsworth between the Battersea and Putney constituencies, with polling districts FFA, FFB, and FFC (to the west of the A214 road) in Putney and polling district FFD (to the east of the A214 road) in Battersea, to bring these constituencies within the permitted electorate range while preventing a complete reconfiguration of all three existing Wandsworth constituencies. We proposed maintaining the existing Tooting constituency wholly unchanged.
- 3.187** Most viable counter-proposals treated South West London as a standalone sub-region in order to avoid Longthornton ward becoming an orphan ward in a Croydon-based constituency. Aside from proposing an amended Mitcham and Morden constituency, the Labour Party (BCE-79496, BCE-95656, BCE-97485) and the Liberal Democrats (BCE-80979, BCE-94859, BCE-97487) supported our initial proposals for the boroughs of Kingston upon Thames, Merton, Richmond upon Thames (south), Sutton, and Wandsworth in their entirety. Jonathan Stansby (BCE-89921) proposed further amendments to constituencies in the borough of Merton, while John Bryant (BCE-73466) presented a counter-proposal for Merton and parts of Kingston upon Thames. The Conservative Party (BCE-86589, BCE-96881, BCE-97483) and the Green Party (BCE-83421, BCE-97484) put forward an identical counter-proposal for Kingston upon

¹⁷ The existing Lewisham West and Penge constituency is divided between our initially proposed South Central and South West London, and South East London sub-regions. It was counted in the South Central and South West sub-region, since the majority of its wards are in this sub-region.

Thames and Richmond upon Thames (south). The Green Party then supported our initial proposals for Merton, but the Conservative Party proposed a different arrangement for this borough. Most respondents supported our approach to Sutton and Wandsworth, maintaining them as coterminous boroughs.

Merton, Kingston upon Thames, and Richmond upon Thames (south)

- 3.188** In the borough of Merton, we received over 200 representations opposing our proposed transfer of 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, with potential confusion over political representation and loss of political voice. Respondents also contended that transferring Longthornton ward to the Croydon North constituency would leave its neighbouring Pollards Hill ward geographically isolated. Representations from Siobhain McDonagh, MP for Mitcham and Morden (BCE-86195, BCE-93662, BCE-97646), local councillors such as Billy Christie (BCE-80649), community organisations such as Longthornton Residents' Group (BCE-97668), and local residents such as BCE-75805, provided much detailed evidence. Counter-proposals from the Conservative Party, the Liberal Democrats, the Labour Party, and several individuals included Longthornton ward in their Mitcham and Morden constituency, thus addressing this feedback from representations.
- 3.189** Elsewhere in the borough of Merton, we received notable opposition to our proposed transfer of 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 upon 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. BCE-65593 described Cannon Hill as an 'integral part' of the Wimbledon constituency, and respondents such as Councillor Nick McLean (BCE-82498, BCE-97658) pointed out that Joseph Hood Recreation Ground and Joseph Hood Primary School – named after a former MP and Mayor of Wimbledon – are both located in Cannon Hill ward.

- 3.190** A number of respondents questioned why parts of Morden town centre, including Morden tube station and parts of the high street (at the southern end of Merton Park ward) would be included in our proposed Wimbledon constituency rather than the Mitcham and Morden constituency. Although Merton Park ward is in the Wimbledon constituency currently, respondents such as BCE-56692 and BCE-65636 clearly took the view that all of Morden town centre should be in the Mitcham and Morden constituency.
- 3.191** In their counter-proposal, the Conservative Party included Cannon Hill ward in their Wimbledon constituency and divided Merton Park ward between their Wimbledon, and Mitcham and Morden constituencies. They 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 Wandle ward from the Wimbledon constituency to the Mitcham and Morden constituency. A number of respondents, including Stephen Hammond, MP for Wimbledon (BCE-79551, BCE-97645) supported the Conservative Party's proposals. Counter-proposals from John Bryant and Jonathan Stansby would include the whole of Merton Park ward in their Mitcham and Morden constituency, in place of Cannon Hill ward, and would not transfer Wandle ward. Both John Bryant and Jonathan Stansby argued that Merton Park ward would be a better fit with the Mitcham and Morden constituency than Cannon Hill ward because Merton Park contains part of Morden town centre.
- 3.192** Representations acknowledged that the Wimbledon constituency needed to gain electors from the borough of Kingston upon Thames to fall within the permitted electorate range. Our initial proposals to include St. James and Old Malden wards, however, were almost unanimously opposed. The New Malden Labour Party Branch (BCE-70157) stated that the separation of St. James and Old Malden wards from Beverley ward would 'fragment' the New Malden community, and other respondents noted that 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, such as BCE-55313, 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. According to the Leader of the Conservative Group on Kingston upon Thames Council (BCE-75767), nobody living in Old Malden 'feels any affinity with Wimbledon from a community, cultural or economic perspective'. The railway line connecting Malden Manor with Wimbledon was seen as a physical barrier rather than a unifier; the Kingston Green Party (BCE-83447) commented that 'although St. James ward shares a boundary with Wimbledon constituency...most local people regard it as a 'hard' boundary because of the railway level crossing.'

- 3.193** The Conservative Party and the Green Party put forward the same counter-proposal for the boroughs of Kingston upon Thames and Richmond upon Thames (south), albeit with different constituency names. They proposed including the two Kingston upon Thames wards of Coombe Hill and Coombe Vale in their Wimbledon constituency, rather than St. James and Old Malden wards. This proposal was generally well supported in representations. Local resident David Jones (BCE-73916) argued that the two Coombe wards ‘form a distinct Coombes community’ – which would be divided into different constituencies under our initial proposals – and asserted that ‘as a Coombes resident I routinely look to Wimbledon village and Wimbledon town centre for retail and leisure.’ 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. As Stephen Hammond MP put it, Wimbledon Common is therefore ‘not just a recreational connection, but a shared political and financial connection’ (BCE-79551).
- 3.194** The Liberal Democrats, however, expressed some concern at the proposed transfer of Coombe Hill and Coombe Vale wards to the Wimbledon constituency. While acknowledging that ‘it is viable and no more disruptive to include the Coombe wards rather than Kingston’s Old Malden and St. James wards in the Wimbledon seat’, the Liberal Democrats were not convinced by the evidence provided in favour of this arrangement. They said: ‘We remain concerned that the Common is a significant dividing barrier between Wimbledon and Kingston’s Coombe wards’ (BCE-94859). Councillor Martin Whelton (BCE-97652) additionally contended that the A3 road – at this point a six-lane highway – divides the Coombe wards from Wimbledon.

- 3.195** In choosing to transfer the Coombe wards rather than the Malden wards to the Wimbledon constituency, the Conservative Party and the Green Party consequently had to make a further adjustment to the Kingston and Richmond constituencies: Grove ward, comprising Kingston town centre, was transferred to the Richmond Park constituency. The Leader of the Conservative Group on Kingston upon Thames Council and Stephen Hammond MP 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 Norbiton ward, directly east of Grove ward, was also a candidate for transfer to the Richmond Park constituency, but Norbiton's links northwards were considered to be much poorer than Grove's links northwards. In arguing the case for including Grove ward in the Richmond Park constituency, Kingston Green Party asserted that this arrangement would unite Kingston town centre, as well as uniting 'all the Thames riverside areas in a single constituency from Hammersmith Bridge to (essentially) the Greater London boundary'. However, the Liberal Democrats expressed concern that the transfer of Grove ward would 'remove' Kingston town centre from its surrounding communities such as Surbiton, which look to Kingston for their main services and amenities.
- 3.196** John Bryant's counter-proposal submitted that Beverley and St. James wards should be included in the Wimbledon constituency, thereby retaining Old Malden ward in a Kingston and Surbiton constituency. John Bryant supported our initial proposals for the Richmond Park constituency and therefore did not transfer 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, including Kingston and Surbiton Constituency Labour Party (BCE-81045), to consider using the new 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.
- 3.197** In assessing the representations and counter-proposals received for the boroughs of Merton, Kingston upon Thames, and Richmond upon Thames, the Assistant Commissioners first noted that it was possible to retain Longthornton ward in the Mitcham and Morden constituency without knock-on implications to the overall pattern of constituencies in the borough of Merton. They were persuaded by the many representations from Longthornton ward that it belongs in a constituency with Mitcham, not with Croydon. They were also convinced by the evidence that Cannon Hill ward has ties to Raynes Park and the wider Wimbledon area. They felt that Merton Park ward would make a better fit with

the Mitcham and Morden constituency than Cannon Hill ward, since Merton Park ward encompasses parts of Morden town centre. They therefore saw merit in the Mitcham and Morden constituency proposed by John Bryant and Jonathan Stansby, which included Longthornton ward and Merton Park ward.

- 3.198** The Assistant Commissioners considered that the Conservative Party's proposed split of Merton Park ward 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 Wandle ward from the Wimbledon constituency to the Mitcham and Morden constituency, but the Assistant Commissioners considered that Wandle ward has stronger ties to Wimbledon, as outlined by Councillor Whelton. The Assistant Commissioners noted that the split of Merton Park ward was not necessary for the integrity of the Conservative Party's wider scheme: Merton Park ward could be wholly transferred to Mitcham and Morden, and Wandle remain in Wimbledon, without impacting their counter-proposal for the rest of the Merton, Kingston, and Richmond areas.
- 3.199** In determining which Kingston upon Thames wards to include in the Wimbledon constituency, the 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 Conservative Party's and Green Party's counter-proposal would keep the three Malden wards together, and the two Coombe wards together, and they felt that there was convincing evidence of community ties between Coombe and Wimbledon. They considered that John Bryant's proposal to transfer Beverley and St. James wards to the Wimbledon constituency would present some of the same issues as the initial proposals, in terms of dividing the Malden community. It would also make Old Malden ward particularly isolated.
- 3.200** While acknowledging it may not be ideal to transfer 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, the Assistant Commissioners ultimately considered that the arrangement presented by the Conservative Party and the Green Party would enable a pattern of constituencies in the borough of Kingston upon Thames better reflecting the statutory factors than our initial proposals. If one ward was required to be transferred to the Richmond Park constituency, they considered that Grove ward would make a more logical choice than 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.

- 3.201** In light of their assessments, the Assistant Commissioners recommended the adoption of the Conservative Party and Green Party counter-proposal for the boroughs of Kingston upon Thames and Richmond upon Thames (south), namely, a Richmond Park and Kingston Town constituency, and a Surbiton and The Maldens constituency. The Assistant Commissioners noted the requests we had received to consider the new ward boundaries in Kingston upon Thames, but determined that there was no scope to do so. The Assistant Commissioners subsequently recommended the adoption of a modified version of the Conservative Party's Wimbledon and Coombe constituency: retaining Wandle ward and not including any part of Merton Park ward. They then recommended a Mitcham and Morden constituency including the whole of Merton Park ward as John Bryant and Jonathan Stansby had proposed.
- 3.202** We agree with the Assistant Commissioners' recommendations for the borough of Merton, but have reservations over whether their recommendations for the borough of Kingston upon Thames mark an improvement over our initial proposals, noting that their recommendations are directly interchangeable with our initial proposals, without wider ramifications. We are particularly concerned that the A3 road in this area presents a significant barrier between Coombe and Wimbledon, especially given its relative paucity of pedestrian crossing points. We also have concerns regarding the transfer of Grove ward to a Richmond-based constituency, since this ward contains Kingston town centre and therefore will provide key services and amenities for residents across the existing Kingston and Surbiton constituency. We do accept, however, the Assistant Commissioners' arguments that their recommendations respond to consultation feedback, and do not break ties within the distinct Malden community and within the distinct Coombe community. On balance, we propose to adopt the Assistant Commissioners' recommendations for the boroughs of Kingston upon Thames and Richmond upon Thames (south) for our revised proposals. However, we propose that their recommended Richmond Park and Kingston Town constituency should be called Richmond Park and Kingston Central. In light of our concerns, we would also particularly invite further views and additional evidence on the proposals for these constituencies during the revised proposals consultation.

Sutton and Wandsworth

- 3.203** 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.

- 3.204** Our proposed Carshalton and Wallington constituency and Sutton and Cheam constituency, in the borough of Sutton, were unchanged from the existing constituencies except for minor realignment with prospective local government ward boundaries: this was very well supported. The Assistant Commissioners therefore did not recommend any changes to our initial proposals for constituencies in the borough of Sutton, and we agree.
- 3.205** In Wandsworth, respondents including Marsha de Cordova, MP for Battersea (BCE-85838, BCE-97558), accepted that our proposed split of Fairfield ward was necessary in order to prevent a reconfiguration of all three Wandsworth constituencies. One local councillor (BCE-84306) 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. The Conservative Party, the Labour Party, and the Liberal Democrats all supported our proposed ward split.
- 3.206** The Wandsworth Conservatives (BCE-73797), among others, advocated using Wandsworth's new ward boundaries – similarly to Kingston upon Thames, the Order for new wards in Wandsworth was made in April 2021 and implemented in May 2022. The Wandsworth Conservatives suggested how the new wards may be grouped into three Wandsworth constituencies, but did not provide any electorate numbers or estimations. We received a request from the London Borough of Wandsworth (BCE-85964) 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. Marsha de Cordova MP made reference to Wandsworth's new wards, but did not consider that this posed a concern at constituency level (BCE-97558).
- 3.207** The Assistant Commissioners acknowledged those representations suggesting a pattern of constituencies using the new ward boundaries in Wandsworth, but, as was the case with Kingston upon Thames, they noted that general use of post-December 2020 ward boundaries across the borough would not be within the scope of the legislation, and would present difficulties in relation to the availability of the related electorate data. They recognised, however, that Commission 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 boundaries. They discovered, however, that such a solution was not practicable. In light of their assessments, the Assistant Commissioners recommended no changes to our initial proposals for the borough of Wandsworth. We agree with their assessments and propose that our initial proposals for Wandsworth should be maintained.

South Central London

- 3.208** The borough of Croydon is mathematically entitled to 3.46 constituencies, meaning that the borough is unable to accommodate a whole number of constituencies and at least one of its constituencies must extend beyond the borough boundary. Our initial proposals for Croydon comprised two constituencies wholly contained within the borough boundary (Croydon East and Croydon South) and two constituencies that would cross into neighbouring boroughs: Croydon North, which would include Longthornton ward from the borough of Merton, and Norwood, which would consist of five Croydon wards and two wards – Gipsy Hill and Knight’s Hill – from the borough of Lambeth. We proposed dividing Waddon ward between the Croydon North and Croydon South constituencies to bring the Croydon South constituency within the permitted electorate range, and avoid a potential ripple effect requiring multiple ward splits in Lambeth.
- 3.209** Our initial proposals for the rest of the borough of Lambeth comprised a Streatham constituency, based on the existing Streatham constituency but including Thurlow Park ward in place of Clapham Common and Thornton wards; a Clapham and Brixton constituency that would span the central part of the borough; and a Vauxhall and Camberwell constituency that would include three wards from the borough of Southwark. We proposed two constituencies that would be wholly contained within Southwark: Bermondsey and Borough (based on the existing Bermondsey and Old Southwark constituency) and Peckham (based on the existing Camberwell and Peckham constituency). We then proposed one constituency, Dulwich and Sydenham, that would span the boroughs of Southwark and Lewisham. Elsewhere in Lewisham, we proposed a Deptford constituency and a Lewisham East constituency, that would be unchanged from the existing constituencies except for realignment with prospective local government ward boundaries in the borough.
- 3.210** The Labour Party (BCE-79496, BCE-95656, BCE-97485) opposed our initial proposals in their entirety for the boroughs of Croydon, Lambeth, Southwark, and Lewisham, and provided a counter-proposal. The Conservative Party (BCE-86589, BCE-96881, BCE-97483) opposed all our initial proposals besides the two constituencies contained wholly within Croydon, and also provided a counter-proposal. The Liberal Democrats (BCE-80979, BCE-94859, BCE-97487) presented a counter-proposal for Lambeth and parts of the boroughs of Croydon and Southwark, which was subsequently adopted with slight amendments by Jonathan Stansby (BCE-89921). All three political parties endorsed the need for a ward split in the South Central area: the Conservative Party and the Liberal Democrats supported our initially proposed split of Waddon ward, while the Labour Party proposed dividing a ward in Lambeth instead. We also received counter-proposals from John Bryant (BCE-73466), John Cartwright (BCE-53975), and Pete Challis (BCE-83681), among others.

- 3.211** Our initial proposals for the borough of Croydon were received with a mixture of support and opposition in representations. Our proposed Croydon South constituency was widely supported, with respondents including Chris Philp, MP for Croydon South (BCE-81587, BCE-97547) 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 Waddon ward; Chris Philp MP contended that the polling district proposed to be included in the Croydon South constituency had strong links to the South Croydon neighbourhood.
- 3.212** We did, however, receive opposition from the Woodside and Addiscombe community regarding our proposed inclusion of 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 transport links towards central Croydon. Including Woodside in a different constituency to Addiscombe would therefore break longstanding local ties. Respondents also highlighted that the Southern rail line ('Brighton Main Line') represents a hard physical barrier between Woodside ward and the rest of the proposed Norwood constituency to its north – which would particularly isolate the residents of Towpath Way / Canal Walk in the southwestern corner of the ward. Sarah Jones, MP for Croydon Central (BCE-85520, BCE-97687) provided detailed evidence, including photographs, to illustrate the 'huge geographical boundary' of what is at this point a 15-track railway line (BCE-85520). Sarah Jones MP additionally provided maps demonstrating that church parishes and school catchment areas respect the boundary of the railway line, with little overlap between Woodside ward and South Norwood ward to the north of the railway. We received a petition of 115 signatures (BCE-85918) expressing concern that Davidson Road, lying parallel to Towpath Way / Canal Walk, would be divided between two constituencies under our initial proposals. Local councillors including Mike Bonello (BCE-84424, BCE-97694) and Hamida Ali (BCE-83699), and local residents such as David Grisdale (BCE-80485) and Amy Foster (BCE-97653), also presented detailed submissions in opposition.

- 3.213** On the other hand, some respondents such as Mark Johnson (BCE-97733) argued that Woodside ward shares local ties with the South Norwood area to its north, pointing out that South Norwood leisure centre, country park, social club and mosque are all located in Woodside ward. They contended that the South Central railway 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 Woodside ward presents a hard boundary. Chris Philp MP (BCE-97547) and a number of Croydon councillors, including Ian Parker (BCE-97684) and Lynne Hale (BCE-97726), highlighted that Croydon Council’s Local Plan¹⁸ designated South Norwood and Woodside as one ‘place’, with Addiscombe as another distinct ‘place’.
- 3.214** The Conservative Party, the Liberal Democrats, and Jonathan Stansby supported our initial proposals for the Croydon South and Croydon East constituencies. The Liberal Democrats and Jonathan Stansby would include Woodside ward in a Norwood constituency with wards to its north, albeit in a slightly different configuration to our initial proposals. In their first written commentary, the Liberal Democrats stated: ‘Placing Woodside ward in the Norwood constituency is very welcome as this unites the Norwood Junction/South Norwood community’ (BCE-80979). The Conservative Party counter-proposal would include Woodside ward in a Croydon North East and Penge constituency, which would cross the borough boundary with Bromley.
- 3.215** The Labour Party opposed our initial proposals for the Croydon East constituency and presented a counter-proposal for the area, which was also put forward by John Bryant: Woodside ward would remain together with Addiscombe in their Croydon East constituency, and consequently Selsdon Vale & Forestdale ward would be transferred to their Croydon South constituency. This counter-proposal would not require Waddon ward to be split. An almost identical arrangement for Croydon East and Croydon South constituencies was presented by Pete Challis, who also proposed that South Croydon ward should be split in order to bring their Croydon North constituency into the permitted electorate range.
- 3.216** 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. Helen Hayes, MP for Dulwich and West Norwood (BCE-83343, BCE-95683, BCE-97534), and many local councillors, community organisations, and individuals voiced strong opposition to the breaking of local ties. Although spanning the two boroughs of Lambeth and Southwark, respondents argued that the existing constituency unites communities such as Herne Hill, Gipsy Hill, and West Dulwich, which are divided

¹⁸ See https://www.croydon.gov.uk/sites/default/files/Planning/Regeneration/Croydon_Local_Plan_2018.pdf

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 (see responses from the Herne Hill Society – BCE-76271, the Herne Hill Forum – BCE-97551, and BCE-80096), and also in West Norwood, whose town centre and high street would be divided into two constituencies. We received a letter-writing campaign (BCE-65829) from West Norwood residents, and representations from the Norwood Forum (BCE-85574, BCE-97667), among others, outlining how our initial proposals for the West Norwood area would not be in accordance with the statutory factors.

- 3.217** Other arguments in opposition contended that our initial proposals would pair boroughs lacking any community, geographical, or administrative connections. Respondents such as BCE-60532 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.
- 3.218** The Labour Party counter-proposal addressed many of these concerns from residents by presenting a Dulwich and West Norwood constituency based on the existing constituency, that would include the communities of Herne Hill, Dulwich, Gipsy Hill, West Dulwich, and West Norwood together in the same constituency. The Labour Party's proposal was accordingly well supported in representations. Pete Challis proposed a similar Dulwich West constituency, but would include Tulse Hill ward (Lambeth) in place of Champion Hill ward (Southwark), and split Knight's Hill ward between proposed Dulwich West, and Norwood and Streatham constituencies. The Conservative Party, in respecting the borough boundary between Lambeth and Southwark, proposed a Norwood constituency that would consist of the Lambeth wards of the existing Dulwich and West Norwood constituency (plus two additional Lambeth wards), and a Dulwich and Sydenham constituency similar to our initial proposals. John Bryant and John Cartwright took a similar approach to the Conservative Party on the Lambeth side of the borough boundary, but then would pair Dulwich with Camberwell in a constituency that would be wholly within the borough of Southwark. The Liberal Democrats and Jonathan Stansby supported our initial proposals for the Dulwich and Sydenham constituency, and would separate the Lambeth wards currently in the Dulwich and West Norwood constituency into two different constituencies: Norwood, and Brixton East and Camberwell.

- 3.219** We received representations from two campaigns relating to the proposals for Lambeth borough as a whole. One campaign (BCE-84712) opposed our initial proposals for Lambeth, stating that they were ‘unnecessarily disruptive’ and broke 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 stretched from the eastern to the western boundaries of the borough with poor internal transport connections. This campaign supported the Conservative Party’s counter-proposal, which presented three constituencies that would be wholly within Lambeth, two of which (Streatham and Vauxhall) would be very similar to the existing constituencies. Conversely, there were representations (BCE-92523) supporting our initial proposals for the Streatham constituency and opposing any counter-proposals that would remove Tulse Hill and/or Brixton Hill wards from the Streatham constituency, on the grounds that these counter-proposals would break local ties. These representations stated that ‘Tulse Hill and Brixton Hill are strongly connected to Streatham ... The Commission’s proposed changes are minimal and do not undermine this coherence, local ties, the geography and natural boundaries that the main and arterial roads provide.’
- 3.220** Several respondents from the borough of Lambeth, as well as Lambeth local authority (BCE-75162), expressed concern that our initial proposals did not take into account Lambeth’s new ward boundaries. The Order for new wards in Lambeth was made in January 2022 – well after the statutory cut-off date.
- 3.221** A number of themes emerged regarding our initial proposals for the Vauxhall and Camberwell constituency, which would span the northern part of the borough boundary between Lambeth and Southwark. Opposition was expressed by some residents of St. George’s ward (Southwark) that they would be separated from their neighbouring areas of Elephant and Castle, and Borough. BCE-94698, for example, wrote: ‘It is disappointing to see that you propose to split our community in two with the new constituencies. Historically, this area used to be part of what was known as St George’s Fields and the connections with Elephant & Castle and Borough are much stronger than with Vauxhall.’ Most representations also noted the developments and regeneration taking place around Elephant and Castle, arguing that the related issues would be best tackled under one MP.

- 3.222** Camberwell residents voiced strong opposition to the prospective division of the Camberwell area between constituencies: under our initial proposals, Camberwell Green ward would be included in the Vauxhall and Camberwell constituency, and St. Giles ward in the Peckham constituency. Respondents outlined strong community ties, shared local services, and a shared sense of identity between these two wards, and an online petition of 810 signatures called ‘Keep Camberwell Together’ was submitted by the SE5 Forum for Camberwell (BCE-80191). A number of respondents also opposed Camberwell Green ward being linked with the Vauxhall area, arguing that Camberwell as a whole has much stronger links with Peckham than with Vauxhall. BCE-59705, for instance, asserted: ‘Detaching Camberwell from Peckham and appending it to Vauxhall makes no sense. Camberwell and Peckham have strong geographic, cultural and economic links. People in Camberwell use facilities in Peckham, but very rarely in Vauxhall as it is more difficult to get to, especially via public transport.’
- 3.223** Several counter-proposals, such as those from the Conservative Party, the Liberal Democrats, Jonathan Stansby, John Bryant, and John Cartwright, would retain the two Camberwell wards together in a single constituency and include St. George’s ward in a Bermondsey-based constituency. The Labour Party, however, proposed a Vauxhall and Camberwell constituency identical to our initial proposals except for the transfer of St. George’s ward to their Bermondsey-based constituency.
- 3.224** Florence Eshalomi, MP for Vauxhall (BCE-79796, BCE-97651), supported the inclusion of the two 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 Prince’s ward) use this station regularly. This response also argued that the inclusion of Newington ward would bring together the entirety of Kennington Park and its surrounding housing estates, and further outlined school links between 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 Lambeth wards of Newington and Vassal. 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.
- 3.225** 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.

- 3.226** 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 prospective ward boundaries. Local councillors James Walsh (BCE-97720) and James Rathbone (BCE-97729), among other respondents, did, however, express opposition to the Conservative Party counter-proposal for the borough, particularly noting that Lewisham 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 Lee Green and Grove Park wards, which would be included in the Conservative Party's proposed Eltham and Blackheath constituency, 'do not have ties to Eltham despite the geographic proximity' (BCE-88602).
- 3.227** The Labour Party counter-proposal for Lewisham, however, was supported. Although it would represent more change from the existing constituencies than our initial proposals, respondents from Lewisham generally supported the Labour Party's proposed transfer of Bellingham ward to the Lewisham East constituency, and Blackheath ward to the Deptford-based constituency. Janet Daby, MP for Lewisham East (BCE-73620), argued that including Bellingham ward in the Lewisham East constituency would bring Downham Estate and Bellingham Estate, both managed by the same housing provider and housing similar communities, together in the same constituency. It would also unite Beckenham Place Park in one constituency, and bring together other local amenities and shared social clubs. Similar arguments were expressed by Whitefoot and Downham Community Food Plus Project (BCE-73660). Regarding Blackheath ward, Councillor Rathbone argued that the Blackheath population has become more oriented towards central Lewisham and the boundary between the areas is blurred, therefore it would make sense to include Blackheath ward in a constituency with Lewisham Central ward.
- 3.228** When considering potential revisions to our initial proposals in the boroughs of Croydon, Lambeth, Lewisham, and Southwark, the 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 so easily 'interchangeable' as they were in parts of North London, since the counter-proposals tended to present significantly different solutions.
- 3.229** In assessing the options for Croydon and Lambeth, the Assistant Commissioners observed that those counter-proposals that treated Lambeth as a borough with coterminous constituencies (the Conservative Party, John Bryant, and John Cartwright) all consequently proposed a constituency crossing from Croydon to Bromley in the Crystal Palace area. On the other hand, those counter-proposals that did not treat Lambeth as a self-contained borough

(the Labour Party, the Liberal Democrats, Jonathan Stansby, and Pete Challis) all proposed constituencies crossing between Lambeth and Southwark, and Lambeth and Croydon. The Labour Party and Pete Challis proposed a Lambeth-Southwark constituency based on the existing Dulwich and West Norwood constituency, and a Lambeth-Croydon constituency joining Streatham with Croydon's northeastern wards. The Liberal Democrats and Jonathan Stansby proposed a Lambeth-Southwark constituency joining parts of Brixton and Herne Hill with Camberwell, and a Lambeth-Croydon constituency joining West Norwood with Croydon's northeastern wards (similar to our initially proposed Norwood constituency).

- 3.230** The Assistant Commissioners saw the merit in the counter-proposals to treat Lambeth as self-contained, with exactly three constituencies aligned to the borough boundaries. They noted that the Conservative Party's and John Cartwright's proposal would also very closely reflect the boundaries of the existing Vauxhall and Streatham constituencies, with both these constituencies changed by only one ward each. They considered that this arrangement for Lambeth would therefore strongly reflect the statutory factors within that borough. They also considered, however, that the Conservative Party's proposal in particular would have significant undesirable knock-on consequences for the boroughs of Southwark and Lewisham: for example, the Peckham community would be divided, with the eastern parts of Peckham being paired with Deptford in a constituency that would cross between the boroughs of Southwark and Lewisham. The Conservative Party contended 'there are good links across the borough boundary here for example the A2' (BCE-86589), but the Assistant Commissioners noted that New Cross Gate ward (Lewisham) is separated from Old Kent Road ward (Southwark) by a number of railway lines and the industrial estate north of the A2 in Old Kent Road ward. Furthermore, the borough of Lewisham would be divided into five different constituencies (compared with three currently) under the Conservative Party's plan, bearing little resemblance to the existing pattern of constituencies. Both the Liberal Democrats and the Labour Party expressed concern over the Conservative Party's counter-proposal for Lewisham. The Assistant Commissioners noted that Lewisham's Bellingham ward would become an orphan ward in the Conservative Party's Beckenham and Bromley Town constituency; Bob Stewart, MP for Beckenham (BCE-97698), argued that since Bellingham ward contains Beckenham Hill railway station and Beckenham Place Park, it has direct links with the Beckenham area. Conversely, the Labour Party noted that Bellingham ward extends almost to Catford town centre in Lewisham, and other respondents outlined Bellingham's links with surrounding Lewisham wards. The Assistant Commissioners were persuaded that Bellingham's links were overwhelmingly with Lewisham rather than Beckenham or Bromley.

- 3.231** When assessing the Labour Party's counter-proposal for Lambeth, Southwark, and Lewisham, the Assistant Commissioners considered that their proposal to retain a Dulwich and West Norwood constituency had merit, given the extensive evidence received from this area. While noting that the Labour Party's 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 the Conservative Party counter-proposal. Lewisham would be divided into only three constituencies under the Labour Party counter-proposal, closely reflecting the existing pattern. While Southwark would be divided into five constituencies under the Labour Party's plan, two would be wholly contained within the borough – and the Assistant Commissioners considered that the Labour Party's proposed Bermondsey and Borough constituency, Peckham constituency, and Dulwich and West Norwood constituency would all be clearly related to the pattern of existing constituencies.
- 3.232** The Assistant Commissioners further considered that the Labour Party's proposed Lewisham West and East Dulwich constituency would unite the Forest Hill and Honor Oak communities in the same constituency. They noted the comments of Stephen Locke (BCE-75758), a resident of Crofton Park ward (which comprises much of the Honor Oak community), who said, 'most of Crofton Park ward ... centres on Honor Oak Park, which has strong community and transport links with Forest Hill and Sydenham.' Although acknowledging that East Dulwich would be separated from Dulwich Village under the Labour Party's proposal, the Assistant Commissioners noted representations BCE-69829 and BCE-79254, expressing links between East Dulwich and Nunhead, and East Dulwich and Forest Hill – communities that would be more closely aligned in the Labour Party's proposed Lewisham West and East Dulwich constituency.
- 3.233** The Liberal Democrats were critical of the Labour Party counter-proposal for South Central London. They asserted: 'In our view, [the Labour Party's] attempt to preserve a form of Dulwich & West Norwood has led to a compromised map elsewhere that negates any advantage' (BCE-94859). They contended, for example, that the Labour Party's proposed Clapham and Brixton constituency would divide the Brixton community, yet the Assistant Commissioners observed that the Brixton area is divided into three constituencies under the existing constituency arrangement, and the Labour Party 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. The Assistant Commissioners also noted that the Liberal Democrats' proposed Brixton East and Camberwell constituency would divide the Brixton community – as would the Conservative Party's proposal for Lambeth.

- 3.234** The Liberal Democrats further argued that the existing Streatham constituency would be divided under the Labour Party's counter-proposal – 'with the Streatham area itself paired awkwardly with Croydon's wards around Crystal Palace. We can see no connection between the two areas and note that this pairing would also split Croydon's Norbury wards between constituencies' (BCE-94859). The Assistant Commissioners observed that the Labour Party's proposed Streatham and Thornton Heath constituency comprised the four core Streatham wards, therefore would not divide the Streatham community, but they recognised that we had received very few representations from the Norbury area, so they were not in a position to make an informed judgement about local ties of the Norbury community.
- 3.235** Turning their attention further south in the borough of Croydon, the Assistant Commissioners saw the benefits of including Woodside ward and the 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 while the Labour Party kept Woodside and Addiscombe together in their counter-proposal for a Croydon East constituency, their consequential transfer of Selsdon Vale & Forestdale ward to the Croydon South constituency would divide the town of Selsdon into two constituencies and break local ties in the Selsdon community. The Conservative Party and the Liberal Democrats strongly opposed the potential division of Selsdon, while local residents and local councillors such as Councillor Jason Cummings (BCE-97685) highlighted the importance of keeping the two Selsdon wards in the same constituency. Respondents noted that Selsdon high street (the A2022) acts as much of the boundary between Selsdon Vale & Forestdale ward, and Selsdon & Addington Village ward, therefore placing the two wards into two separate constituencies would divide the town straight through the town centre.
- 3.236** The Assistant Commissioners noted that the Labour Party did not propose a ward split in the borough of Croydon, but instead proposed splitting Thornton ward in the borough of Lambeth. They contended that 'Thornton comprises parts of Streatham Hill and Clapham and therefore looks towards both the proposed Streatham & Thornton Heath and Brixton & Clapham constituencies' (BCE-95656). The Liberal Democrats, however, strongly opposed this split, describing it as 'incomprehensible' and arguing that it would divide the regeneration area of the Clapham Park Estate (BCE-94859).

- 3.237** While favouring the Labour Party 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 Labour Party's counter-proposal to address these issues: Waddon ward could be split instead of Thornton ward (by transferring two polling districts, WDN5 and WDN6, to the Croydon South constituency, rather than just WDN6 as in our initial proposals); Norbury & Pollards Hill ward could then be transferred from the Labour Party's Croydon North constituency to their Streatham and Thornton Heath constituency, to bring the two Norbury wards together in the same constituency; and consequently Woodside ward could be transferred from the Labour Party's Croydon East constituency to their 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 South Norwood ward to its north, and they were sympathetic to the Liberal Democrats' view that 'moving Woodside ward is less harmful than splitting Selsdon' (BCE-94859). To help them understand the practical implications of this revised version of the Labour Party's counter-proposal, the Assistant Commissioners visited the area.
- 3.238** On visiting Waddon ward, the 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 Norbury & Pollards Hill ward, driving up the A23 road. They observed a strong sense of the Norbury community identity, indicated by the high street along the A23 in the northern part of the ward and the names of the local services located there, such as Norbury Library, Norbury Gym, and the names of cafes, shops, and churches. They considered that the railway line was not a significant barrier between this ward and Norbury Park ward, 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 explored parts of Norbury Park ward, observing Norbury College for Girls and Norbury Park itself. The names of such local amenities, and certain street names in the ward such as Norbury Avenue, all indicated a continuing shared Norbury community identity. The Assistant Commissioners therefore considered that the two Norbury wards were strongly linked, and including them together in the same constituency would represent an improvement on the Labour Party's proposal.

- 3.239** Crossing the borough boundary from the Norbury area to the Streatham area, the Assistant Commissioners felt that the areas merged together with little discernible difference from Norbury Park ward to Streatham South ward. In contrast, driving 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 makes more sense ‘on the ground’ and better reflects the statutory factors than a cross-borough constituency between the West Norwood area (Knight’s Hill / Gipsy Hill wards) and Croydon’s Crystal Palace & Upper Norwood ward, as had been proposed in our initial proposals and in the Liberal Democrats’ counter-proposal.
- 3.240** When visiting Woodside ward, the Assistant Commissioners considered that the railway lines did, on the whole, present a significant physical barrier between Woodside ward and South Norwood ward to its north. They felt 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, eateries, and services on either side of Portland Road southeast 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 / Towpath Way, the Assistant Commissioners accordingly 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.

- 3.241** 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 Waddon ward to remain in a single constituency, and that would enable most of 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 Park Hill & Whitgift ward to the Croydon South constituency, and splitting Woodside ward by including all its polling districts except WDS1 in the Croydon East constituency. WDS1 would be included in a constituency with South Norwood ward to its north. The Assistant Commissioners considered that the WDS1 polling district, in the northeastern corner of the ward, was the one part of Woodside that could be said to link seamlessly with 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. They also felt that South Norwood Country Park would make a suitable constituency boundary along the southeastern edge of the polling district. Regarding Park Hill & Whitgift ward, the Assistant Commissioners 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.
- 3.242** In light of their assessments, and mindful of the careful balancing of a number of issues, the Assistant Commissioners recommended the adoption of an amended version of the Labour Party’s counter-proposal for the borough of Croydon and part of the borough of Lambeth, as outlined in the solution above. The Assistant Commissioners also recommended that the names of two of the Labour Party’s proposed constituencies in this area should be revised, given the amendments to their composition: they recommended that the Croydon North constituency should be named Croydon West and South Norwood, while the Streatham and Thornton Heath constituency should be named Streatham and Norbury. They recommended that the names Croydon East and Croydon South should be retained. In the borough of Lambeth, the Assistant Commissioners recommended a Lambeth Central constituency replicating the Labour Party’s Clapham and Brixton constituency, but including the whole of Thornton ward. Since the constituency would not encompass all of the Brixton community, the Assistant Commissioners felt that Lambeth Central would be a more appropriate name. The Assistant Commissioners acknowledged those representations encouraging us to take account of Lambeth’s new ward boundaries, but they considered that using post-December 2020 ward boundaries across the borough would not be viable, for similar reasons to those described in relation to other areas above.

- 3.243** The Assistant Commissioners subsequently recommended the adoption of the Labour Party's counter-proposal for the rest of the boroughs of Lambeth, Southwark, and Lewisham – namely, the 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 accordance with the Commission's 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 the adoption of the Labour Party counter-proposal 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.
- 3.244** We agree with the Assistant Commissioners' recommendations for the South Central London sub-region. We therefore propose 12 revised constituencies of Bermondsey and Old Southwark, Croydon East, Croydon South, Croydon West and South Norwood, Dulwich and West Norwood, Lambeth Central, Lewisham East, Lewisham North and Deptford, Lewisham West and East Dulwich, Peckham, Streatham and Norbury, and Vauxhall.

South East London

- 3.245** Our initial proposals grouped together the boroughs of Bexley, Bromley, and Greenwich to form the South East London sub-region. There are currently eight constituencies across these parts of London (not including the Lewisham West and Penge constituency, which crosses the borough boundary between Bromley and Lewisham), and our initial proposals were also for eight constituencies. None of the eight existing constituencies have electorates within the permitted electorate range.

- 3.246** 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 Glyndon ward to the Erith and Thamesmead constituency. Spanning the boroughs of Greenwich and Bexley, our proposed Erith and Thamesmead constituency would be based on the existing constituency, but also gain 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 – that would largely follow the existing arrangement in the borough, albeit with boundaries realigned to new local government ward boundaries.
- 3.247** 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 Bromley and Greenwich, noting the continuous residential development and numerous road links across that boundary.
- 3.248** The Liberal Democrats (BCE-80979, BCE-94859, BCE-97487) supported our initial proposals for the South East London sub-region in their entirety. The Labour Party (BCE-79496, BCE-95656, BCE-97485) supported four of our proposed constituencies, but provided a counter-proposal for Bexley and parts of Bromley and Greenwich. The Conservative Party (BCE-86589, BCE-96881, BCE-97483) put forward a counter-proposal for Bromley and parts of Greenwich. We also received counter-proposals from John Bryant (BCE-73466), John Cartwright (BCE-53975), and Pete Challis (BCE-83681), among several others.
- 3.249** In the borough of Greenwich, our initial proposals for the Greenwich and Woolwich constituency were strongly supported by local residents, community representatives, local councillors, and Matthew Pennycook, MP for Greenwich and Woolwich (BCE-79275, BCE-97496). Respondents acknowledged that the existing constituency was above the permitted electorate range, and they supported the proposed transfer of Glyndon ward to the Erith and Thamesmead constituency. Many respondents said that our initial proposals would maintain the integrity of the Greenwich, Woolwich, and Charlton communities, and they provided much detailed evidence of strong and longstanding community ties between these areas.
- 3.250** Additionally, many respondents specifically expressed opposition to counter-proposals that would divide the Greenwich and/or Woolwich communities, namely those counter-proposals from Lewis Baston (BCE-85357), Pete Challis (BCE-83681), BCE-79433,¹⁹ Oliver Raven (BCE-85352), John Cartwright

¹⁹ This response is often referred to as ‘Preston’ in other representations (Preston being the published hometown of the respondent), since the respondent did not consent for their name to be published.

(BCE-53975), and John Bryant (BCE-73466). Particularly strong opposition was voiced to the counter-proposals from Lewis Baston and Pete Challis, which would involve splitting at least one ward in the Woolwich area. Under Lewis Baston's counter-proposal, Woolwich Riverside ward would be divided between a Greenwich and Deptford constituency, and an Erith and Thamesmead constituency, while Woolwich Common ward would be included in an Eltham constituency. Under Pete Challis' 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.

- 3.251** The counter-proposals from John Bryant, John Cartwright, and Lewis Baston all put forward 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 including Kenneth Pearce (BCE-93803), Susan Bush (BCE-94930), and Roger Hough (BCE-97725) 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.
- 3.252** Matthew Pennycook MP provided a detailed submission (BCE-95607) outlining how the six aforementioned counter-proposals would break community ties across the existing Greenwich and Woolwich constituency and cause disruption elsewhere. He concluded that the counter-proposals 'not only pay less respect to existing constituency boundaries [than the initial proposals] and in many cases produce oddly shaped and geographically diffuse constituencies, but they variously either undermine the integrity of distinct communities in this corner of South-East London or destroy the strong local ties that exist between them'.
- 3.253** We received a number of representations from residents of Kidbrooke with Hornfair ward, arguing that the Hornfair part of the ward (polling districts KH1 / 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 such as Richard Goodwin (BCE-75142) 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. BCE-74729, for example, made reference to the new ward arrangements. The Order for new wards in Greenwich was made in December 2021 – well after the statutory cut-off date.

- 3.254 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, as outlined by Abena Oppong-Asare, MP for Erith and Thamesmead (BCE-84788). Our proposed addition of 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. Councillor Matthew Morrow (BCE-84699) said: 'Bringing all of Plumstead together in the proposed Erith and Thamesmead constituency would reflect the way people feel about their community and respect the way they live their lives.'
- 3.255 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. Clive Efford, MP for Eltham (BCE-82792, BCE-97581), provided details on the history of Eltham and Shooters Hill, contending that 'any move to remove Shooters Hill from the [Eltham] constituency ... will be undoing centuries of parliamentary history and undermining community cohesion' (BCE-82792). We also received a campaign (BCE-70034) from Shooters Hill residents opposing their proposed removal from the Eltham constituency.
- 3.256 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. Representations such as BCE-96419 argued that we should amend our initial proposals slightly to use the boundary between the new Plumstead Common ward and the new Shooters Hill ward as the boundary between the Erith and Thamesmead, and Eltham constituencies, submitting that this would better reflect local ties. Respondents including the Erith and Thamesmead Constituency

Labour Party (BCE-96888) and Maria Freeman (BCE-97691) also said that it would be advantageous to use the western boundary of the new Plumstead & Glyndon ward as the boundary between the Erith and Thamesmead, and Greenwich and Woolwich constituencies.

- 3.257** In response to comments from the residents of Shooters Hill and Plumstead, and comments from the residents of Hornfair, Councillor Matt Hartley (BCE-97703, BCE-96422) proposed splitting both Shooters Hill ward and Kidbrooke with Hornfair ward using existing polling districts. Councillor Hartley's plan was presented within the framework of the Conservative Party's counter-proposal, but the Assistant Commissioners noted that it could also be incorporated into our initial proposals. 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. Councillor Hartley 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 Greenwich borough's new ward boundaries.
- 3.258** 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 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 to be united in a single constituency. There was opposition, however, to the proposed name Sidcup and Welling: respondents including Louie French, MP for Old Bexley and Sidcup (BCE-90509) and James Brokenshire, the late Member of Parliament for Old Bexley and Sidcup (BCE-85526), 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.

- 3.259** The Conservative Party fully supported our initial proposals for the borough of Bexley, and for the constituencies of Erith and Thamesmead, and Greenwich and Woolwich. The Labour Party supported our initial proposals for the Greenwich and Woolwich constituency, but provided a counter-proposal for the remainder of Greenwich and Bexley. This counter-proposal would retain Shooters Hill ward in an Eltham constituency, resulting in knock-on changes to the Bexley constituencies: for example, the two Welling wards would be included in different constituencies, and Chislehurst ward from the borough of Bromley would be included as an orphan ward in a Sidcup and Chislehurst constituency. The Labour Party stated that the towns of Sidcup and Chislehurst have ‘strong road connections across the A20’ and are of a ‘similar size and character’ (BCE-79496). However, Councillor David Leaf (BCE-96877, BCE-97699) disputed the Labour Party’s assertion, stating that the A20 is instead a ‘significant hard geographical barrier as a busy dual carriageway and runs along the Bexley and Bromley borough boundary’ (BCE-96877), further noting that only one road and one pedestrian footpath cross the A20 between Sidcup and Chislehurst. Councillor Leaf also strongly opposed the division of the two Welling wards, arguing that this proposal would break community ties in Welling. The Labour Party additionally proposed to transfer Slade Green & Northend ward from the Bexleyheath and Crayford constituency to the Erith and Thamesmead constituency; this was opposed by the Erith and Thamesmead Constituency Labour Party, who argued that the ward’s ties are primarily south to Crayford rather than west to Erith.
- 3.260** Counter-proposals from John Bryant and John Cartwright, similarly to the Labour Party, would retain 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, John Bryant and John Cartwright would adhere to the borough boundary between Greenwich and Bexley in the Thamesmead area (contrary to the existing constituency arrangement). The Conservative Party opposed their plan, stating that the borough boundary is ‘indistinct in the Thamesmead area (where it is a straight line which bears no relation to residential development) and that Thamesmead is contained in both boroughs. Using this boundary breaks clear local ties in Thamesmead...’ (BCE-96881). John Bryant and John Cartwright also linked Sidcup with Orpington in the borough of Bromley, crossing the A20 road further east than in the Labour Party’s proposal.
- 3.261** Our initial proposals for the Eltham and Chislehurst constituency would combine the Eltham area of Greenwich with the Chislehurst area 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 Coldharbour and New Eltham ward towards the south of Greenwich borough, was again referenced as a strong dividing line. The Chislehurst Society (BCE-63365) commented: 'The A20 is a particularly physical barrier to any natural links between what is essentially an inner London Borough [Greenwich] and the semi-rural outer London Borough [Bromley] in which Chislehurst is situated.' 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. We received detailed evidence from Sir Bob Neill, MP for Bromley and Chislehurst (BCE-83845, BCE-96378, BCE-97679), local resident Malcolm Stevens (BCE-97676), and many others.

- 3.262** There was considerable support (over 150 representations) for a counter-proposal for a 'Chislehurst and Mottingham' constituency, as presented by the Coldharbour & New Eltham Conservatives (BCE-83821), which was identical in configuration to the national Conservative Party's 'Chislehurst and Bromley Common' constituency. The counter-proposal would join the Chislehurst area with other wards in Bromley and one ward – Coldharbour and New Eltham – from 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 ('Sidcup Line') railway that acts as the northern boundary to Coldharbour and New Eltham ward) represents the actual dividing line between communities. Respondents from Mottingham, including the Mottingham Residents Association (BCE-93669), highlighted that the Mottingham community spans the Bromley-Greenwich boundary, therefore this counter-proposal would unite all of Mottingham in a single constituency. On the other hand, a number of respondents such as Denise Chaplin (BCE-93334) and BCE-96892 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.
- 3.263** To accommodate their proposed Chislehurst and Mottingham / Chislehurst and Bromley Common constituency, the Conservative Party subsequently proposed an Eltham and Blackheath constituency that would cross the borough boundary between Greenwich and Lewisham. The Conservative Party argued that there is 'continuous urban development across the Greenwich-Lewisham borough boundary at this point' (BCE-86589), 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 their proposal would unite more of the Blackheath community (which spans Greenwich and Lewisham boroughs) in one constituency. As previously noted, there was opposition to the Conservative Party's proposal from respondents in the borough of Lewisham.

- 3.264** In the borough of Bromley, we received strong opposition to our initial proposals regarding Petts Wood and Knoll ward, which would be transferred from the existing Orpington constituency to our proposed Bromley constituency. Local councillors, Gareth Bacon, MP for Orpington (BCE-68240, BCE-97697), and a campaign from local residents (BCE-86097) contended that our initial proposals would break community ties, since Petts Wood and Knoll ward has longstanding 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 Conservative Party's counter-proposal in this area, which would keep Petts Wood and Knoll ward in the Orpington constituency, and split the neighbouring Cray Valley West ward between their proposed Orpington, and Chislehurst and Bromley Common constituencies. Some representations – including BCE-56991, BCE-64153, and BCE-66866 – proposed splitting 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, Martin Curry (BCE-73697) and Kevin Larkin (BCE-85350) proposed splitting Darwin ward (situated further south in Bromley borough) and transferring part of Darwin ward and the whole of Biggin Hill ward from the Orpington constituency to the Bromley constituency, so that Petts Wood and Knoll ward could remain in the Orpington constituency.
- 3.265** We received few comments regarding the rest of our proposed Bromley constituency, but the Sundridge Residents' Association (BCE-85800) and BCE-85840 supported the proposed inclusion of Bickley ward, and Plaistow and Sundridge ward in our Bromley constituency, given the wards' proximity to and ties with Bromley town centre. The Sundridge Residents' Association stated: 'In general the community strongly identifies with Bromley Town, its amenities and surroundings.' Some concern was expressed over the inclusion of Hayes and Coney Hall ward in our Bromley constituency, for example, from Councillor Nicholas Bennett (BCE-97708) who contended that the Coney Hall community looks to West Wickham – which was included in the Beckenham constituency in our initial proposals.
- 3.266** Our initially proposed Beckenham constituency, which would join together the Beckenham and Penge areas, was greeted with a mixed response. Some Penge residents such as BCE-71284, Matt Goodburn (BCE-78735), BCE-74969, and BCE-78751 argued that they share very little in common with Beckenham, and identify more closely with Lewisham or Crystal Palace / Upper Norwood in terms of culture, socio-economic status, and outlook. Conversely, others such as BCE-88422, Eileen Welsh (BCE-97686), and Marie Bardsley (BCE-97700) argued that Penge and Beckenham make a natural fit, and share many local services and recreational amenities, such as Crystal Palace park and Beckenham Spa. Local

resident Anthony McPartlan (BCE-97731) noted that our initial proposals would unite all of Beckenham town centre in a single constituency (part of Beckenham town centre and high street lies in Clock House ward, which is currently in the Lewisham West and Penge constituency). Others – such as BCE-84519 and BCE-71140 – also supported the proposed inclusion of Clock House ward in the Beckenham constituency, BCE-84519 noting ‘this area is not only fully part of the town but includes the ambulance and fire stations, the Beckenham swimming pool and a major Beckenham rail station.’ Some respondents pointed out that our initial proposals would reflect the pre-2010 Beckenham constituency. The Penge Forum (BCE-90003), Penge & Cator Labour Party Branch (BCE-91360), and many individual respondents argued, however, that if our initial proposals were to be adopted, ‘Penge’ should be included in the constituency name, to recognise this sizeable and historic community. The Conservative Party proposed a Croydon North East and Penge constituency, that would group the Penge area with Croydon’s northeastern wards, arguing that their proposal would bring more of the Crystal Palace community together, but they acknowledged that it would be difficult to unite all of Crystal Palace in the same constituency, since the area spans at least three London boroughs. Local resident BCE-84946 proposed a Crystal Palace and Penge constituency, while John Bryant and John Cartwright also proposed constituencies that would link Bromley with Croydon in the Crystal Palace area.

- 3.267** As for central Bromley and Beckenham, the Conservative Party proposed a Beckenham and Bromley Town constituency that would join Bromley Town ward with the Beckenham area to its west and include Bellingham ward from Lewisham. The Conservative Party argued that ‘although the Bromley Town ward is presently in Bromley and Chislehurst it does have links with Copers Cope, and Shortlands, wards [to its west]’ (BCE-86589). Some respondents including Bob Stewart, MP for Beckenham (BCE-97698) and Thomas Turrell (BCE-97734) referenced local ties between Shortlands ward in particular and Bromley town centre, given their close proximity, and Scott Pattenden, Chair of the Beckenham Conservative Association (BCE-97673), outlined further ties between Beckenham and Bromley. Respondents also welcomed the Conservative Party’s proposed inclusion of Hayes and Coney Hall ward and West Wickham ward in the same constituency. The Liberal Democrats, however, were highly critical of the Conservative Party’s counter-proposal for Bromley borough as a whole, asserting: ‘The Conservative counter-proposal significantly weakens [the initial proposals] and has not a single seat made up of whole Bromley wards. Two have an orphan ward from elsewhere and a third requires a further split ward. Placing the Bromley [Town] ward in the Beckenham seat is a further splitting of local ties as Bromley town centre is split from the nearby residential areas that look to it. We cannot support any of this’ (BCE-94859).

- 3.268** When considering whether to recommend any revisions to our initial proposals for the South East London sub-region, the 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 provided by Lewis Baston, Pete Challis, BCE-79433, Oliver Raven, John Cartwright, and John Bryant would break strong local ties across the Greenwich and Woolwich areas and, in some cases, result in significant disruption to other existing constituencies.
- 3.269** Regarding Shooters Hill ward, the Assistant Commissioners acknowledged the differing views put forward by Plumstead residents and Shooters Hill residents. They recognised that dividing the ward along the new ward boundaries, as some respondents had suggested, would make sense in terms of community ties. The Assistant Commissioners also acknowledged the representations from Hornfair residents and appreciated that they would gravitate more naturally towards Charlton and Greenwich than towards Eltham. The Assistant Commissioners carefully considered the counter-proposal put forward by Councillor Hartley, to divide both 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 Kidbrooke with Hornfair ward would represent a greater change to existing constituency boundaries, since the whole ward is currently part of the Eltham constituency.
- 3.270** 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 recognised that under the Labour Party's counter-proposal, the Greenwich and Woolwich constituency would be the same as our initial proposals, but they considered that the resultant changes to the Bexley constituencies would break a number of local ties in Bexley borough. They considered that the counter-proposals from John Bryant and John Cartwright would result in even more disruption to existing constituencies and local ties in Bexley borough, as well as significant disruption to the existing Greenwich and Woolwich constituency. They agreed with the Conservative Party that, despite being divided by a borough boundary, the community of Thamesmead should remain united in an Erith and Thamesmead constituency. The Assistant

Commissioners observed that the counter-proposals from Lewis Baston and Pete Challis retained our initial proposals for Bexley borough, retained an Erith and Thamesmead constituency similar to the existing constituency, and retained Shooters Hill ward in an Eltham constituency, but these counter-proposals consequently divided the Woolwich community, splitting at least one ward in Woolwich, and caused knock-on disruption elsewhere in South London.

- 3.271** On balance, the 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 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. They also observed, in accordance with the Conservative Party and the Liberal Democrats, that the Shooters Hill community is physically separated from Eltham by Eltham Common, Oxleas Wood, and the A207 road. Therefore, while Shooters Hill residents may have community ties towards Eltham, they are also geographically distinct from the Eltham area.
- 3.272** Before settling their recommendations for Bexley borough and the north of Greenwich borough, however, the Assistant Commissioners considered the strong opposition to our initial proposals for the Eltham and Chislehurst constituency. They recognised the merits of the Conservative Party's counter-proposal 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 the Conservative Party's counter-proposal on the grounds that it would unite the Mottingham community, which spans the Greenwich-Bromley boundary; the Assistant Commissioners observed that our initial proposals would 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 southeastern part of Coldharbour and New Eltham ward (such as Brownspring Drive and Domonic Drive), supporting the Conservative Party's counter-proposal on the basis that they look to Chislehurst rather than Eltham for their local services; the Assistant Commissioners noted that our initial proposals would again address these residents' views, by joining Coldharbour and New Eltham ward with both Chislehurst ward and Mottingham and Chislehurst North ward.

- 3.273 Understanding that the A20 is considered a hard boundary by many respondents living in the area, the 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 Coldharbour and New Eltham ward to reflect the A20 as a hard geographic barrier. The Conservative Party would use the railway line / ward boundary as their proposed constituency boundary. However, recognising that the community of New Eltham spans the railway line in the eastern parts of Coldharbour and New Eltham ward and Eltham South ward, the Assistant Commissioners were persuaded by those representations expressing concern that the Conservative Party's counter-proposal would divide the New Eltham community and break local ties in this area.
- 3.274 Furthermore, the Assistant Commissioners noted that the Conservative Party's 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 Conservative Party's argument that their proposed Eltham and Blackheath constituency would unite more of the Blackheath community in the same constituency, the Assistant Commissioners observed that 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 Conservative Party's arrangement would not represent a significant improvement upon our initial proposals for this area.
- 3.275 When assessing counter-proposals for the borough of Bromley, the Assistant Commissioners noted that the counter-proposals from Lewis Baston and Pete Challis would not traverse either the Bromley-Greenwich or the Bromley-Bexley borough boundary. Lewis Baston and Pete Challis both proposed a Bromley and Chislehurst constituency that would be wholly within the borough of Bromley and similar to the existing Bromley and Chislehurst constituency. John Bryant and John Cartwright would both join parts of Bromley and Bexley boroughs in their proposed Orpington and Sidcup constituency, but also proposed a Bromley and Chislehurst constituency that would be wholly within the borough of Bromley. The Assistant Commissioners considered, however, that all these counter-proposals would cause significant consequential disruption elsewhere. They saw merit in the Conservative Party's proposed Orpington constituency, in that it would retain Petts Wood and Knoll ward, and also acknowledged the advantages of their proposed Beckenham and Bromley Town constituency in terms of keeping Hayes and Coney Hall ward and West Wickham ward together. The

Assistant Commissioners were, however, concerned by the proposed separation of Bromley Town ward from its surrounding wards of Bickley, and Plaistow and Sundridge – and also Bromley Common and Keston – since these wards would all have close ties to Bromley town centre.

- 3.276** In assessing the representations in response to our initial proposals for the three constituencies contained wholly within the borough of Bromley, the Assistant Commissioners considered that the key issue generating wholesale opposition from respondents was the transfer of Petts Wood and Knoll ward from the Orpington constituency to the Bromley constituency. They therefore sought to find amendments to our initial proposals that would enable Petts Wood and Knoll ward to remain in the Orpington constituency, and their investigations showed that this would not be viable without splitting at least one ward in the borough. A potential solution involved splitting Farnborough and Crofton ward (currently in the Orpington constituency) between the Orpington and Bromley constituencies, and splitting 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 Coldharbour and New Eltham ward, the Assistant Commissioners visited the area.
- 3.277** When visiting Shortlands ward, the Assistant Commissioners drove along Hayes Lane (the B251), which would become the constituency boundary under the ward split proposal. They considered it to be a well-used through-route rather than a road that drew communities together, so considered that it could form a suitable constituency boundary. They crossed from Shortlands ward into Bromley Town ward, to assess whether the railway line between Shortlands and Bromley Town posed a significant barrier, and concluded that there were good road connections across the railway line and that, given the geographical proximity to Bromley, residents of the eastern part of Shortlands ward would naturally gravitate to Bromley town centre for local services and amenities. The Assistant Commissioners were therefore persuaded that a split of Shortlands ward between the Beckenham and Bromley constituencies could be justified.
- 3.278** On visiting Farnborough and Crofton ward, the Assistant Commissioners drove along Crofton Avenue, which would become (part of) the constituency boundary under the ward split proposal. They observed that it was a small road running through an integrated residential area, and that splitting the ward in this way would likely divide the Crofton community. They also considered that the whole ward has close ties to Orpington and that local residents would clearly gravitate to Orpington as their nearest town centre. Accordingly, the Assistant Commissioners were not persuaded by the prospect of dividing Farnborough and Crofton ward between the Orpington and Bromley constituencies.

- 3.279 The Assistant Commissioners subsequently visited Petts Wood and Knoll ward, driving northwards from Orpington town centre through the Knoll area to Petts Wood high street. They noted Knoll's proximity to Orpington high street and also observed that the area ascends to a summit on Crofton Lane. They considered that Crofton Lane 'sub-divided' the ward and somewhat separated the Knoll community from the Petts Wood community. Following their observations, they agreed to revisit those representations that suggested splitting Petts Wood and Knoll ward along Crofton Lane.
- 3.280 Travelling further north, the Assistant Commissioners visited Chislehurst and then crossed the borough boundary between Bromley and Greenwich. They subsequently crossed the A20 road and the Dartford Loop Line to visit the New Eltham area, before driving out of London along the A20. They noted the imperceptibility of the borough boundary between Bromley and Greenwich at this point, and agreed that the A20 road represents a significant dividing line. The railway line appeared to be a weaker boundary, and they observed that New Eltham's 'town centre' area spanned the railway line, with shops, cafes, businesses, and local amenities extending along Footscray Road and Southwood Road either side of the railway. The Assistant Commissioners therefore considered that using the railway line / Coldharbour and New Eltham ward boundary as a constituency boundary would break local ties in New Eltham. Driving eastwards along the A20, the Assistant Commissioners observed that the road widened and became a very strong boundary between Bromley and Bexley boroughs, which confirmed their view that any counter-proposals for constituencies crossing between Bromley and Bexley (including the Labour Party's counter-proposal) would be undesirable.
- 3.281 Following their site visits, the Assistant Commissioners investigated further options for ward splits in Bromley borough, and identified that it was possible to divide Petts Wood and Knoll ward along Crofton Lane. This would avoid the problematic split of Farnborough and Crofton ward, and would acknowledge the Knoll area's strong ties to Orpington. The Petts Wood area, however, would still be linked with Bromley, and the split of Shortlands ward would still be required for numerical purposes, neither of which would be ideal.

3.282 The Assistant Commissioners subsequently returned to those representations suggesting a split of Darwin ward. Their investigations confirmed that it was possible to avoid splitting both Shortlands ward and Petts Wood and Knoll ward by splitting only Darwin ward instead: this would involve transferring the DA1 polling district, and the whole of Biggin Hill ward, from the Orpington to the Bromley constituency. Since 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 – therefore, although geographically distant, Biggin Hill could be seen as reasonably well connected to Bromley town. Due to the shape of 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 southeast of the town. A solution was identified in Bromley borough’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. The Assistant Commissioners 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 Petts Wood and Knoll ward to remain in the Orpington constituency.

- 3.283** In light of their site visits and their analysis of representations and counter-proposals across the South East London sub-region, the 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 Petts Wood and Knoll ward in the Orpington constituency, and transfer 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. The Assistant Commissioners acknowledged that we had also received opposition to our proposed Beckenham constituency, but they considered that the inclusion of Penge in the name would go some way in recognising the distinct identity felt by Penge residents, and they considered that many of the counter-proposals for the area would result in significant knock-on disruption elsewhere. We agree with the recommendations of the Assistant Commissioners and accordingly propose revised constituencies of Bromley and Biggin Hill, Beckenham and Penge, and Orpington. We consider that the Assistant Commissioners' recommended split of Darwin ward meets our criteria for when a ward split is appropriate, and – subsequently – when it is appropriate to take account of post-December 2020 wards.
- 3.284** Regarding the boroughs of Greenwich and Bexley, the 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. The Assistant Commissioners 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, the 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, and accordingly concluded that retaining our initial proposals for Eltham and Chislehurst would ultimately enable a pattern of constituencies better reflecting the statutory factors across the rest of the South East London sub-region, and more widely, across the South Central London sub-region too. In light of the arguments and the evidence presented to us, we agree with the recommendations of the Assistant Commissioners.

- 3.285** Our revised proposals for the whole of South London do not include any orphan wards. While our revised proposals would increase the number of split wards across South London from two, in our initial proposals, to three, we consider that these ward splits would help to minimise the breaking of local ties and ultimately result in an arrangement of constituencies better reflecting the statutory factors.

4 How to have your say

- 4.1 We are consulting on our revised proposals for a four-week period, from 8 November to 5 December 2022 inclusive. We encourage everyone to use this last opportunity to help finalise the design of the new constituencies – the more public views we hear and the more local information that is provided, the more informed our decisions will be before making final recommendations to Parliament.
- 4.2 While people are welcome to write to us on any issue regarding the constituency boundaries we set out in this report and the accompanying maps, our main focus during this final consultation is on those constituencies which we have revised since our initial proposals. While we will consider representations that comment again on the initial proposals that we have not revised, it is likely that particularly compelling further evidence or submissions will be needed to persuade us to depart, at this late stage in the review, from those of our initial proposals, which have withstood intensive scrutiny of objections in the process of consultation and review to which they have already been subject. Representations relating to initial proposals that we have not revised and which simply repeat evidence or arguments that have already been raised in either of the previous two consultation stages are likely to carry little weight with the Commission.
- 4.3 When making comments on our revised proposals, we ask people to bear in mind the tight constraints placed on the Commission by the rules set by Parliament, discussed in chapter 2 and in our Guide to the 2023 Review. Most importantly:
- We cannot recommend constituencies that have electorates that contain more than 77,062 or fewer than 69,724 electors
 - We are basing our proposals on local government ward boundaries (existing or – where relevant – prospective) as at 1 December 2020 as the building blocks of constituencies – although where there is strong justification for doing so, we will consider dividing a ward between constituencies (see the Guide to the 2023 Review for more detailed information)
 - We have constructed constituencies within regions, so as not to cross regional boundaries – very compelling reasons would need to be given to persuade us that we should depart from this approach.
- 4.4 These issues mean that we encourage people who are making a comment about their local area to bear in mind there may be consequential effects for neighbouring areas that might result from their suggestions. The Commission must look at the recommendations for new constituencies across the whole region (and, indeed, across England). What may be a better solution for one location may have undesirable consequences for others. We therefore ask everyone wishing to respond to our consultation to be aware that their counter-proposals may have an impact on neighbouring constituencies, and on those further afield across the region.

How can you give us your views?

- 4.5 Views on our revised proposals should be given to the Commission in writing. We encourage everyone who wishes to comment on our proposals in writing to do so through our interactive consultation website at www.bcereviews.org.uk – you will find all the details you need and can comment directly through the website. The website allows you to explore the map of our proposals and obtain further data, including the electorate sizes of every ward. You can also upload text or data files you may have previously prepared setting out your views.
- 4.6 We encourage everyone, before submitting a representation, to read our approach to protecting and using your personal details (available at www.bcereviews.org.uk). As these consultations are very much concerned with a respondent's sense of place and community, when publishing responses, we will associate the response with the general locality (e.g. town or village) of the respondent's address, but we will not publish a respondent's name or detailed address with their response, unless they specifically ask us to do so.
- 4.7 It is important to stress that all representations, whether they have been made through our website or sent to us in writing, will be given equal consideration by the Commission.

What do we want views on?

- 4.8 We would particularly like to ask two things of people responding to our consultation. Firstly, if you support our revised proposals, please tell us so. Past experience suggests that too often people who are happy with our proposals do not respond in support, while those who object to them do respond to make their points. That can give a distorted view of the balance of public support or objection to our proposals. Secondly, if you are considering objecting to our revised proposals, please use the resources (such as maps and electorate figures) available on our website and at the places of deposit to put forward counter-proposals that are in accordance with the rules to which we are working.
- 4.9 Above all, however, we encourage everyone to have their say on our revised proposals and, in doing so, to become involved in drawing the map of new Parliamentary constituencies. This is the final chance to contribute to the design of the new constituencies, and the more views we get on those constituencies, the more informed our consideration in developing them will be, and the better we will be able to reflect the public's views in the final recommendations that we present in 2023.

Appendix: Revised proposals for constituencies, including wards and electorates

Constituency	Ward	Local Authorities	Electorate
Barking BC			71,822
	Abbey	Barking and Dagenham	7,721
	Alibon	Barking and Dagenham	6,371
	Becontree	Barking and Dagenham	8,561
	Eastbury	Barking and Dagenham	6,913
	Gascoigne	Barking and Dagenham	6,097
	Goresbrook	Barking and Dagenham	6,975
	Longbridge	Barking and Dagenham	8,273
	Mayesbrook	Barking and Dagenham	6,407
	Parsloes	Barking and Dagenham	6,248
	Thames	Barking and Dagenham	8,256
Battersea BC			71,949
	Balham	Wandsworth	11,444
	Fairfield – part of (polling district FFD)	Wandsworth	3,627
	Latchmere	Wandsworth	10,522
	Northcote	Wandsworth	10,384
	Queenstown	Wandsworth	12,758
	Shaftesbury	Wandsworth	10,788
	St. Mary's Park	Wandsworth	12,426
Beckenham and Penge BC			76,625
	Clock House	Bromley	11,573
	Copers Cope	Bromley	12,140
	Crystal Palace	Bromley	9,031
	Kelsey and Eden Park	Bromley	12,263
	Penge and Cator	Bromley	12,197

Constituency	Ward	Local Authorities	Electorate
	Shortlands	Bromley	7,529
	West Wickham	Bromley	11,892
Bermondsey and Old Southwark BC			70,602
	Borough & Bankside	Southwark	6,347
	Chaucer	Southwark	9,861
	London Bridge & West Bermondsey	Southwark	9,936
	North Bermondsey	Southwark	10,471
	Rotherhithe	Southwark	9,640
	South Bermondsey	Southwark	10,211
	St. George's	Southwark	5,444
	Surrey Docks	Southwark	8,692
Bethnal Green and Stepney BC			77,000
	Bethnal Green	Tower Hamlets	13,096
	Shadwell	Tower Hamlets	7,922
	Spitalfields & Banglatown	Tower Hamlets	7,925
	St. Dunstan's	Tower Hamlets	8,615
	St. Peter's	Tower Hamlets	12,940
	Stepney Green	Tower Hamlets	7,802
	Weavers	Tower Hamlets	8,500
	Whitechapel	Tower Hamlets	10,200
Bexleyheath and Crayford BC			69,948
	Barnehurst	Bexley	8,351
	Bexleyheath	Bexley	11,575
	Crayford	Bexley	10,936
	Crook Log	Bexley	11,686
	Northumberland Heath	Bexley	7,725
	Slade Green & Northend	Bexley	7,805
	West Heath	Bexley	11,870
Brentford and Isleworth BC			76,354
	Brentford East	Hounslow	4,874
	Brentford West	Hounslow	5,651
	Heston East	Hounslow	6,772
	Hounslow Central	Hounslow	4,872
	Hounslow East	Hounslow	4,475
	Hounslow Heath	Hounslow	8,584
	Hounslow South	Hounslow	8,864
	Isleworth	Hounslow	8,551
	Osterley & Spring Grove	Hounslow	9,048

Constituency	Ward	Local Authorities	Electorate
	Syon & Brentford Lock	Hounslow	7,288
	Whitton	Richmond upon Thames	7,375
Bromley and Biggin Hill BC			70,418
	Bickley	Bromley	11,586
	Biggin Hill	Bromley	7,902
	Bromley Common and Keston	Bromley	12,521
	Bromley Town	Bromley	12,761
	Darwin – part of	Bromley	1,644
	Hayes and Coney Hall	Bromley	12,589
	Plaistow and Sundridge	Bromley	11,415
Carshalton and Wallington BC			72,755
	Beddington	Sutton	8,069
	Carshalton Central	Sutton	8,444
	Carshalton South & Clockhouse	Sutton	7,667
	Hackbridge	Sutton	3,874
	South Beddington & Roundshaw	Sutton	7,820
	St Helier East	Sutton	5,359
	St Helier West	Sutton	7,803
	The Wrythe	Sutton	7,336
	Wallington North	Sutton	8,320
	Wallington South	Sutton	8,063
Chelsea and Fulham BC			76,481
	Fulham Reach	Hammersmith and Fulham	7,768
	Fulham Town	Hammersmith and Fulham	5,030
	Lillie	Hammersmith and Fulham	4,161
	Munster	Hammersmith and Fulham	8,027
	Palace & Hurlingham	Hammersmith and Fulham	7,820
	Parsons Green & Sandford	Hammersmith and Fulham	5,027
	Sands End	Hammersmith and Fulham	6,657
	Walham Green	Hammersmith and Fulham	4,869

Constituency	Ward	Local Authorities	Electorate
	West Kensington	Hammersmith and Fulham	5,990
	Chelsea Riverside	Kensington and Chelsea	5,365
	Redcliffe	Kensington and Chelsea	4,840
	Royal Hospital	Kensington and Chelsea	5,545
	Stanley	Kensington and Chelsea	5,382
Chingford and Woodford Green BC			75,677
	Bridge	Redbridge	9,002
	Churchfields	Redbridge	10,343
	Monkhams	Redbridge	7,086
	Chingford Green	Waltham Forest	7,969
	Endlebury	Waltham Forest	8,158
	Hale End and Highams Park	Waltham Forest	8,530
	Hatch Lane	Waltham Forest	8,118
	Larkswood	Waltham Forest	8,398
	Valley	Waltham Forest	8,073
Chipping Barnet BC			76,187
	Barnet Vale	Barnet	11,578
	Brunswick Park	Barnet	11,029
	East Barnet	Barnet	11,818
	Edgwarebury	Barnet	7,927
	High Barnet	Barnet	8,493
	Totteridge & Woodside	Barnet	9,481
	Underhill	Barnet	8,491
	Whetstone	Barnet	7,370
Cities of London and Westminster BC			73,140
	City and County of the City of London	City of London	6,304
	Abbey Road	Westminster	7,201
	Hyde Park	Westminster	5,162
	Knightsbridge & Belgravia	Westminster	6,330
	Marylebone	Westminster	7,131
	Pimlico North	Westminster	7,135
	Pimlico South	Westminster	7,076
	Regent's Park	Westminster	6,928
	St James's	Westminster	6,318
	Vincent Square	Westminster	7,042

Constituency	Ward	Local Authorities	Electorate
	West End	Westminster	6,513
Croydon East BC			75,346
	Addiscombe East	Croydon	8,190
	Addiscombe West	Croydon	9,351
	New Addington North	Croydon	6,870
	New Addington South	Croydon	7,663
	Selsdon & Addington Village	Croydon	7,794
	Selsdon Vale & Forestdale	Croydon	7,134
	Shirley North	Croydon	11,248
	Shirley South	Croydon	7,994
	Woodside – part of (polling districts WDS2, WDS3, WDS4, WDS5, and WDS6)		9,102
Croydon South BC			71,541
	Coulsdon Town	Croydon	10,429
	Kenley	Croydon	7,766
	Old Coulsdon	Croydon	7,444
	Park Hill & Whitgift	Croydon	3,957
	Purley & Woodcote	Croydon	11,816
	Purley Oaks & Riddlesdown	Croydon	7,541
	Sanderstead	Croydon	11,704
	South Croydon	Croydon	10,884
Croydon West and South Norwood BC			70,812
	Bensham Manor	Croydon	10,058
	Broad Green	Croydon	11,420
	Fairfield	Croydon	7,630
	Selhurst	Croydon	7,210
	South Norwood	Croydon	10,224
	Waddon	Croydon	11,251
	West Thornton	Croydon	10,938
	Woodside – part of (polling district WDS1)	Croydon	2,081
Dagenham and Rainham BC			73,627
	Eastbrook	Barking and Dagenham	7,357
	Heath	Barking and Dagenham	7,155
	River	Barking and Dagenham	6,462
	Valence	Barking and Dagenham	6,866

Constituency	Ward	Local Authorities	Electorate
	Village	Barking and Dagenham	7,016
	Whalebone	Barking and Dagenham	7,328
	Elm Park	Havering	9,654
	Hacton – part of	Havering	688
	Rainham and Wennington	Havering	9,299
	South Hornchurch	Havering	10,029
	St. Andrew's – part of	Havering	1,773
Dulwich and West Norwood BC			74,314
	Coldharbour	Lambeth	12,046
	Gipsy Hill	Lambeth	9,777
	Herne Hill	Lambeth	11,227
	Knight's Hill	Lambeth	9,571
	Thurlow Park	Lambeth	9,840
	Champion Hill	Southwark	6,933
	Dulwich Village	Southwark	7,755
	Dulwich Wood	Southwark	7,165
Ealing Central and Acton BC			75,399
	Ealing Broadway	Ealing	8,652
	Ealing Common	Ealing	10,062
	East Acton	Ealing	8,399
	Hanger Hill	Ealing	9,260
	North Acton	Ealing	9,129
	South Acton	Ealing	9,324
	Southfield	Ealing	10,397
	College Park & Old Oak	Hammersmith and Fulham	5,238
	Wormholt	Hammersmith and Fulham	4,938
Ealing North BC			72,985
	Central Greenford	Ealing	7,547
	Greenford Broadway	Ealing	9,359
	North Greenford	Ealing	9,485
	North Hanwell	Ealing	8,929
	Northolt Mandeville	Ealing	9,724
	Northolt West End	Ealing	9,365
	Perivale	Ealing	9,013
	Pitshanger	Ealing	9,563

Constituency	Ward	Local Authorities	Electorate
Ealing Southall BC			75,085
	Dormers Wells	Ealing	9,311
	Hanwell Broadway	Ealing	8,747
	Lady Margaret	Ealing	10,013
	Northfield	Ealing	9,314
	Norwood Green	Ealing	9,128
	Southall Broadway	Ealing	6,442
	Southall Green	Ealing	8,751
	Southall West	Ealing	3,919
	Walpole	Ealing	9,460
East Ham BC			70,902
	Boleyn	Newham	9,480
	East Ham Central	Newham	8,780
	East Ham North	Newham	8,629
	East Ham South	Newham	8,945
	Green Street East	Newham	8,826
	Little Ilford	Newham	9,177
	Manor Park	Newham	8,684
	Wall End	Newham	8,381
Edmonton BC			75,280
	Bush Hill Park	Enfield	9,394
	Edmonton Green	Enfield	9,304
	Haselbury	Enfield	9,987
	Highfield	Enfield	6,303
	Jubilee	Enfield	9,262
	Lower Edmonton	Enfield	9,237
	Ponders End	Enfield	6,393
	Upper Edmonton	Enfield	8,498
	Winchmore Hill	Enfield	6,902
Eltham and Chislehurst BC			74,179
	Chislehurst	Bromley	12,014
	Mottingham and Chislehurst North	Bromley	7,049
	Coldharbour and New Eltham	Greenwich	9,334
	Eltham North	Greenwich	9,405
	Eltham South	Greenwich	8,812
	Eltham West	Greenwich	8,648
	Kidbrooke with Hornfair	Greenwich	9,625
	Middle Park and Sutcliffe	Greenwich	9,292

Constituency	Ward	Local Authorities	Electorate
Enfield North BC			76,748
	Brimsdown	Enfield	9,594
	Bullsmoor	Enfield	6,868
	Carterhatch	Enfield	6,861
	Enfield Lock	Enfield	10,072
	Grange Park	Enfield	6,317
	Ridgeway	Enfield	8,894
	Southbury	Enfield	9,501
	Town	Enfield	9,075
	Whitewebbs	Enfield	9,566
Erith and Thamesmead BC			76,728
	Belvedere	Bexley	10,842
	Erith	Bexley	7,309
	Thamesmead East	Bexley	9,194
	Abbey Wood	Greenwich	9,813
	Glyndon	Greenwich	10,085
	Plumstead	Greenwich	9,809
	Shooters Hill	Greenwich	9,097
	Thamesmead Moorings	Greenwich	10,579
Feltham and Heston BC			75,226
	Bedfont	Hounslow	8,884
	Cranford	Hounslow	8,638
	Feltham North	Hounslow	7,018
	Feltham West	Hounslow	9,430
	Hanworth Park	Hounslow	6,012
	Hanworth Village	Hounslow	9,705
	Heston Central	Hounslow	8,139
	Heston West	Hounslow	9,269
	Hounslow West	Hounslow	8,131
Finchley and Golders Green BC			75,761
	Childs Hill	Barnet	11,014
	Cricklewood	Barnet	5,177
	East Finchley	Barnet	10,487
	Finchley Church End	Barnet	12,036
	Garden Suburb	Barnet	8,863
	Golders Green	Barnet	7,818
	West Finchley	Barnet	11,650
	Woodhouse	Barnet	8,716

Constituency	Ward	Local Authorities	Electorate
Greenwich and Woolwich BC			69,824
	Blackheath Westcombe	Greenwich	9,391
	Charlton	Greenwich	9,562
	Greenwich West	Greenwich	13,645
	Peninsula	Greenwich	14,596
	Woolwich Common	Greenwich	10,376
	Woolwich Riverside	Greenwich	12,254
Hackney North and Stoke Newington BC			75,401
	Cazenove	Hackney	8,612
	Clissold	Hackney	9,079
	Hackney Downs	Hackney	9,010
	King's Park	Hackney	8,936
	Lea Bridge	Hackney	9,651
	Shacklewell	Hackney	6,039
	Springfield	Hackney	8,587
	Stamford Hill West	Hackney	5,670
	Stoke Newington	Hackney	9,817
Hackney South and Shoreditch BC			75,197
	Dalston	Hackney	6,460
	Hackney Central	Hackney	9,115
	Hackney Wick	Hackney	8,489
	Haggerston	Hackney	9,280
	Homerton	Hackney	8,457
	Hoxton East & Shoreditch	Hackney	7,422
	Hoxton West	Hackney	8,538
	London Fields	Hackney	8,878
	Victoria	Hackney	8,558
Hammersmith and Chiswick BC			74,746
	Addison	Hammersmith and Fulham	4,982
	Avonmore	Hammersmith and Fulham	4,585
	Brook Green	Hammersmith and Fulham	5,165
	Coningham	Hammersmith and Fulham	7,059
	Grove	Hammersmith and Fulham	4,879
	Hammersmith Broadway	Hammersmith and Fulham	4,535

Constituency	Ward	Local Authorities	Electorate
	Ravenscourt	Hammersmith and Fulham	4,649
	Shepherd's Bush Green	Hammersmith and Fulham	3,335
	Wendell Park	Hammersmith and Fulham	4,884
	White City	Hammersmith and Fulham	6,152
	Chiswick Gunnersbury	Hounslow	8,159
	Chiswick Homefields	Hounslow	9,565
	Chiswick Riverside	Hounslow	6,797
Hampstead and Highgate BC			74,613
	Belsize	Camden	5,855
	Fortune Green	Camden	6,272
	Frognal	Camden	4,057
	Hampstead Town	Camden	5,932
	Highgate	Camden	7,382
	Kentish Town North	Camden	5,853
	Kilburn	Camden	6,289
	Primrose Hill	Camden	7,691
	South Hampstead	Camden	8,154
	West Hampstead	Camden	7,729
	Highgate	Haringey	9,399
Harrow East BC			76,299
	Queensbury	Brent	10,021
	Belmont	Harrow	6,331
	Canons	Harrow	6,572
	Centenary	Harrow	9,064
	Edgware	Harrow	8,890
	Harrow Weald	Harrow	9,894
	Kenton East	Harrow	9,178
	Kenton West	Harrow	6,826
	Stanmore	Harrow	9,523
Harrow West BC			74,060
	Greenhill	Harrow	6,378
	Harrow on the Hill	Harrow	6,612
	Headstone	Harrow	9,941
	Marlborough	Harrow	6,257
	North Harrow	Harrow	6,297
	Rayners Lane	Harrow	6,309

Constituency	Ward	Local Authorities	Electorate
	Roxbourne	Harrow	6,161
	Roxeth	Harrow	9,655
	Wealdstone North	Harrow	5,975
	Wealdstone South	Harrow	4,225
	West Harrow	Harrow	6,250
Hayes and Harlington BC			72,897
	Belmore	Hillingdon	10,519
	Charville	Hillingdon	7,378
	Hayes Town	Hillingdon	8,355
	Heathrow Villages	Hillingdon	6,936
	Pinkwell	Hillingdon	9,958
	West Drayton	Hillingdon	10,733
	Wood End	Hillingdon	11,221
	Yeading	Hillingdon	7,797
Hendon BC			71,496
	Burnt Oak	Barnet	11,424
	Colindale North	Barnet	6,254
	Colindale South	Barnet	8,814
	Edgware	Barnet	12,391
	Hendon	Barnet	11,786
	Mill Hill	Barnet	11,799
	West Hendon	Barnet	9,028
Holborn and St Pancras BC			75,084
	Bloomsbury	Camden	6,981
	Camden Square	Camden	7,991
	Camden Town	Camden	4,872
	Gospel Oak	Camden	8,313
	Haverstock	Camden	8,643
	Holborn & Covent Garden	Camden	7,910
	Kentish Town South	Camden	6,883
	King's Cross	Camden	8,514
	Regent's Park	Camden	7,796
	St Pancras & Somers Town	Camden	7,181
Hornchurch and Upminster BC			76,938
	Cranham	Havering	9,846
	Emerson Park – part of	Havering	8,233
	Gooshays	Havering	10,597
	Hacton – part of	Havering	8,993
	Harold Wood	Havering	10,727

Constituency	Ward	Local Authorities	Electorate
	Heaton	Havering	9,385
	St. Andrew's – part of	Havering	8,657
	Upminster	Havering	10,500
Hornsey and Friern Barnet BC			70,565
	Friern Barnet	Barnet	11,564
	Alexandra Park	Haringey	6,317
	Crouch End	Haringey	9,987
	Fortis Green	Haringey	8,838
	Harringay	Haringey	8,225
	Hornsey	Haringey	10,508
	Muswell Hill	Haringey	6,362
	Stroud Green	Haringey	8,764
Ilford North BC			74,684
	Aldborough	Redbridge	9,204
	Barkingside	Redbridge	9,747
	Clayhall	Redbridge	9,578
	Cranbrook	Redbridge	8,686
	Fairlop	Redbridge	8,833
	Fullwell	Redbridge	10,506
	Hainault	Redbridge	9,181
	Valentines	Redbridge	8,949
Ilford South BC			74,065
	Chadwell Heath	Barking and Dagenham	7,109
	Chadwell	Redbridge	10,093
	Clementswood	Redbridge	7,913
	Goodmayes	Redbridge	8,739
	Ilford Town	Redbridge	5,565
	Loxford	Redbridge	7,867
	Mayfield	Redbridge	9,412
	Newbury	Redbridge	8,651
	Seven Kings	Redbridge	8,716
Islington North BC			73,970
	Arsenal	Islington	8,808
	Finsbury Park	Islington	8,690
	Highbury	Islington	9,851
	Hillrise	Islington	10,288
	Junction	Islington	8,702
	Mildmay	Islington	9,556

Constituency	Ward	Local Authorities	Electorate
	Tollington	Islington	9,569
	Tufnell Park	Islington	8,506
Islington South BC			75,905
	De Beauvoir	Hackney	6,449
	Barnsbury	Islington	8,330
	Bunhill	Islington	7,002
	Caledonian	Islington	6,835
	Canonbury	Islington	8,834
	Clerkenwell	Islington	7,518
	Holloway	Islington	7,916
	Laycock	Islington	8,190
	St Mary's & St James'	Islington	7,840
	St Peter's & Canalside	Islington	6,991
Kensington and Bayswater BC			75,980
	Abingdon	Kensington and Chelsea	4,547
	Brompton & Hans Town	Kensington and Chelsea	4,586
	Campden	Kensington and Chelsea	4,808
	Colville	Kensington and Chelsea	5,701
	Courtfield	Kensington and Chelsea	4,236
	Dalgarno	Kensington and Chelsea	4,244
	Earl's Court	Kensington and Chelsea	4,820
	Golborne	Kensington and Chelsea	5,470
	Holland	Kensington and Chelsea	4,776
	Norland	Kensington and Chelsea	3,665
	Notting Dale	Kensington and Chelsea	5,388
	Pembridge	Kensington and Chelsea	3,124
	Queen's Gate	Kensington and Chelsea	4,040
	St. Helen's	Kensington and Chelsea	4,069
	Bayswater	Westminster	6,765
	Lancaster Gate	Westminster	5,741

Constituency	Ward	Local Authorities	Electorate
Lambeth Central BC			75,460
	Brixton Hill	Lambeth	11,281
	Clapham Common	Lambeth	9,723
	Clapham Town	Lambeth	10,677
	Ferndale	Lambeth	11,516
	Larkhall	Lambeth	12,150
	Thornton	Lambeth	9,317
	Tulse Hill	Lambeth	10,796
Lewisham East BC			71,706
	Bellingham	Lewisham	6,861
	Catford South	Lewisham	11,163
	Downham	Lewisham	11,172
	Grove Park	Lewisham	9,858
	Hither Green	Lewisham	12,093
	Lee Green	Lewisham	9,804
	Rushey Green	Lewisham	10,755
Lewisham North and Deptford BC			73,504
	Blackheath	Lewisham	10,505
	Brockley	Lewisham	12,108
	Deptford	Lewisham	10,792
	Evelyn	Lewisham	8,286
	Ladywell	Lewisham	10,386
	Lewisham Central	Lewisham	4,699
	New Cross Gate	Lewisham	5,329
	Telegraph Hill	Lewisham	11,399
Lewisham West and East Dulwich BC			69,904
	Crofton Park	Lewisham	10,726
	Forest Hill	Lewisham	10,511
	Perry Vale	Lewisham	12,187
	Sydenham	Lewisham	11,635
	Dulwich Hill	Southwark	7,005
	Goose Green	Southwark	10,499
	Peckham Rye	Southwark	7,341
Leyton and Wanstead BC			71,330
	South Woodford	Redbridge	8,580
	Wanstead Park	Redbridge	5,799
	Wanstead Village	Redbridge	9,273
	Cann Hall	Waltham Forest	7,598
	Cathall	Waltham Forest	6,926

Constituency	Ward	Local Authorities	Electorate
	Forest	Waltham Forest	7,813
	Grove Green	Waltham Forest	8,310
	Leyton	Waltham Forest	9,004
	Leytonstone	Waltham Forest	8,027
Mitcham and Morden BC			75,565
	Colliers Wood	Merton	7,519
	Cricket Green	Merton	7,083
	Figge's Marsh	Merton	6,559
	Graveney	Merton	7,220
	Lavender Fields	Merton	6,721
	Longthornton	Merton	6,994
	Lower Morden	Merton	7,914
	Merton Park	Merton	5,543
	Pollards Hill	Merton	7,377
	Ravensbury	Merton	6,032
	St Helier	Merton	6,603
Old Bexley and Sidcup BC			74,317
	Blackfen & Lamorbey	Bexley	12,057
	Blendon & Penhill	Bexley	11,848
	East Wickham	Bexley	11,471
	Falconwood & Welling	Bexley	11,674
	Longlands	Bexley	7,674
	Sidcup	Bexley	11,424
	St. Mary's & St. James	Bexley	8,169
Orpington BC			71,571
	Chelsfield and Pratts Bottom	Bromley	11,198
	Cray Valley East	Bromley	11,244
	Cray Valley West	Bromley	12,015
	Darwin – part of	Bromley	2,591
	Farnborough and Crofton	Bromley	11,801
	Orpington	Bromley	12,079
	Petts Wood and Knoll	Bromley	10,643
Peckham BC			71,176
	Faraday	Southwark	7,529
	North Walworth	Southwark	9,303
	Nunhead & Queen's Road	Southwark	11,187
	Old Kent Road	Southwark	10,996
	Peckham	Southwark	9,994

Constituency	Ward	Local Authorities	Electorate
	Rye Lane	Southwark	10,774
	St. Giles	Southwark	11,393
Poplar and Limehouse BC			75,814
	Blackwall & Cubitt Town	Tower Hamlets	10,546
	Bromley South	Tower Hamlets	8,151
	Canary Wharf	Tower Hamlets	8,232
	Island Gardens	Tower Hamlets	8,337
	Lansbury	Tower Hamlets	11,783
	Limehouse	Tower Hamlets	4,252
	Mile End	Tower Hamlets	12,381
	Poplar	Tower Hamlets	4,222
	St. Katharine's & Wapping	Tower Hamlets	7,910
Putney BC			73,041
	East Putney	Wandsworth	11,393
	Fairfield – part of (polling districts FFA, FFB, and FFC)	Wandsworth	7,376
	Roehampton and Putney Heath	Wandsworth	8,863
	Southfields	Wandsworth	12,530
	Thamesfield	Wandsworth	12,097
	West Hill	Wandsworth	10,290
	West Putney	Wandsworth	10,492
Queen's Park and Little Venice BC			75,256
	Harlesden & Kensal Green	Brent	11,528
	Kilburn	Brent	10,988
	Queens Park	Brent	11,396
	Church Street	Westminster	6,923
	Harrow Road	Westminster	6,964
	Little Venice	Westminster	5,930
	Maida Vale	Westminster	6,776
	Queen's Park	Westminster	7,874
	Westbourne	Westminster	6,877
Richmond Park and Kingston Central BC			75,860
	Canbury	Kingston upon Thames	8,674
	Grove	Kingston upon Thames	7,211
	Tudor	Kingston upon Thames	6,748
	Barnes	Richmond upon Thames	7,454
	East Sheen	Richmond upon Thames	7,314

Constituency	Ward	Local Authorities	Electorate
	Ham, Petersham & Richmond Riverside	Richmond upon Thames	6,903
	Kew	Richmond upon Thames	8,346
	Mortlake & Barnes Common	Richmond upon Thames	8,156
	North Richmond	Richmond upon Thames	7,375
	South Richmond	Richmond upon Thames	7,679
Romford BC			73,730
	Brooklands	Havering	11,491
	Emerson Park – part of	Havering	1,463
	Havering Park	Havering	9,790
	Hylands	Havering	10,189
	Mawneys	Havering	9,513
	Pettits	Havering	10,103
	Romford Town	Havering	11,123
	Squirrel's Heath	Havering	10,058
Ruislip, Northwood and Pinner BC			75,700
	Hatch End	Harrow	6,864
	Pinner	Harrow	9,850
	Pinner South	Harrow	10,918
	Eastcote	Hillingdon	12,425
	Northwood	Hillingdon	8,042
	Northwood Hills	Hillingdon	8,107
	Ruislip	Hillingdon	11,815
	Ruislip Manor	Hillingdon	7,679
Southgate and Wood Green BC			76,034
	Arnos Grove	Enfield	5,713
	Bowes	Enfield	5,866
	Cockfosters	Enfield	6,933
	New Southgate	Enfield	6,102
	Oakwood	Enfield	5,944
	Palmers Green	Enfield	6,281
	Southgate	Enfield	9,247
	Bounds Green	Haringey	5,870
	Noel Park	Haringey	7,855
	White Hart Lane	Haringey	8,136
	Woodside	Haringey	8,087

Constituency	Ward	Local Authorities	Electorate
Stratford and Bow BC			73,849
	Forest Gate North	Newham	8,921
	Forest Gate South	Newham	9,422
	Green Street West	Newham	8,746
	Stratford and New Town	Newham	17,631
	Bow East	Tower Hamlets	12,908
	Bow West	Tower Hamlets	9,079
	Bromley North	Tower Hamlets	7,142
Streatham and Norbury BC			76,050
	Crystal Palace & Upper Norwood	Croydon	10,964
	Norbury & Pollards Hill	Croydon	7,556
	Norbury Park	Croydon	7,260
	Thornton Heath	Croydon	10,806
	St. Leonard's	Lambeth	9,880
	Streatham Hill	Lambeth	10,386
	Streatham South	Lambeth	9,013
	Streatham Wells	Lambeth	10,185
Surbiton and The Maldens BC			74,826
	Alexandra	Kingston upon Thames	6,650
	Berrylands	Kingston upon Thames	6,723
	Beverley	Kingston upon Thames	7,042
	Chessington North and Hook	Kingston upon Thames	6,344
	Chessington South	Kingston upon Thames	7,408
	Norbiton	Kingston upon Thames	6,352
	Old Malden	Kingston upon Thames	6,986
	St. James	Kingston upon Thames	6,347
	St. Mark's	Kingston upon Thames	6,975
	Surbiton Hill	Kingston upon Thames	7,169
	Tolworth and Hook Rise	Kingston upon Thames	6,830
Sutton and Cheam BC			71,284
	Belmont	Sutton	8,106
	Cheam	Sutton	8,306
	North Cheam	Sutton	8,396
	Stonecot	Sutton	5,669
	Sutton Central	Sutton	6,831
	Sutton North	Sutton	7,531
	Sutton South	Sutton	7,706
	Sutton West & East Cheam	Sutton	7,673

Constituency	Ward	Local Authorities	Electorate
	Worcester Park North	Sutton	5,533
	Worcester Park South	Sutton	5,533
Tooting BC			76,986
	Bedford	Wandsworth	11,126
	Earlsfield	Wandsworth	11,578
	Furzedown	Wandsworth	10,356
	Graveney	Wandsworth	10,864
	Nightingale	Wandsworth	11,497
	Tooting	Wandsworth	11,422
	Wandsworth Common	Wandsworth	10,143
Tottenham BC			75,968
	Brownswood	Hackney	6,348
	Woodberry Down	Hackney	6,563
	Bruce Castle	Haringey	7,521
	Hermitage & Gardens	Haringey	5,910
	Northumberland Park	Haringey	7,718
	Seven Sisters	Haringey	5,181
	South Tottenham	Haringey	8,399
	St Ann's	Haringey	5,765
	Tottenham Central	Haringey	8,381
	Tottenham Hale	Haringey	5,505
	West Green	Haringey	8,677
Twickenham BC			75,889
	Fulwell & Hampton Hill	Richmond upon Thames	7,780
	Hampton	Richmond upon Thames	7,445
	Hampton North	Richmond upon Thames	7,131
	Hampton Wick & South Teddington	Richmond upon Thames	7,953
	Heathfield	Richmond upon Thames	6,933
	South Twickenham	Richmond upon Thames	7,574
	St Margarets & North Twickenham	Richmond upon Thames	8,106
	Teddington	Richmond upon Thames	7,848
	Twickenham Riverside	Richmond upon Thames	7,547

Constituency	Ward	Local Authorities	Electorate
	West Twickenham	Richmond upon Thames	7,572
Uxbridge and South Ruislip BC			71,510
	Colham & Cowley	Hillingdon	11,417
	Harefield Village	Hillingdon	4,147
	Hillingdon East	Hillingdon	10,448
	Hillingdon West	Hillingdon	5,675
	Ickenham & South Harefield	Hillingdon	11,372
	South Ruislip	Hillingdon	11,403
	Uxbridge	Hillingdon	10,624
	Yiewsley	Hillingdon	6,424
Vauxhall BC			69,995
	Bishop's	Lambeth	6,789
	Oval	Lambeth	10,901
	Prince's	Lambeth	11,195
	Stockwell	Lambeth	9,706
	Vassall	Lambeth	11,456
	Camberwell Green	Southwark	10,254
	Newington	Southwark	9,694
Walthamstow BC			70,867
	Chapel End	Waltham Forest	8,538
	High Street	Waltham Forest	9,145
	Higham Hill	Waltham Forest	9,058
	Hoe Street	Waltham Forest	8,770
	Lea Bridge	Waltham Forest	9,286
	Markhouse	Waltham Forest	8,729
	William Morris	Waltham Forest	8,706
	Wood Street	Waltham Forest	8,635
Wembley BC			76,463
	Alperton	Brent	7,480
	Barnhill	Brent	6,770
	Kenton	Brent	11,772
	Northwick Park	Brent	8,411
	Preston	Brent	6,546
	Sudbury	Brent	7,793
	Tokington	Brent	5,883
	Wembley Central	Brent	9,701
	Wembley Hill	Brent	7,833
	Wembley Park	Brent	4,274

Constituency	Ward	Local Authorities	Electorate
West Ham and Beckton BC			70,590
	Beckton	Newham	8,761
	Canning Town North	Newham	9,341
	Canning Town South	Newham	10,504
	Custom House	Newham	7,202
	Plaistow North	Newham	8,651
	Plaistow South	Newham	8,999
	Royal Docks	Newham	8,661
	West Ham	Newham	8,471
Willesden BC			75,880
	Brondesbury Park	Brent	8,502
	Cricklewood & Mapesbury	Brent	7,784
	Dollis Hill	Brent	11,728
	Kingsbury	Brent	6,433
	Roundwood	Brent	9,265
	Stonebridge	Brent	11,587
	Welsh Harp	Brent	10,046
	Willesden Green	Brent	10,535
Wimbledon and Coombe BC			75,714
	Coombe Hill	Kingston upon Thames	6,388
	Coombe Vale	Kingston upon Thames	6,706
	Abbey	Merton	6,872
	Cannon Hill	Merton	6,855
	Hillside	Merton	5,753
	Raynes Park	Merton	8,010
	Village	Merton	8,322
	Wandle	Merton	4,073
	West Barnes	Merton	7,009
	Wimbledon Park	Merton	7,170
	Wimbledon Town & Dundonald	Merton	8,556

Glossary

Assistant Commissioner	Independent person appointed at the request of the BCE to assist it with the discharge of its functions.	Public hearing	Formal opportunity during the secondary consultation period for people to make oral representations, chaired by an Assistant Commissioner.
Borough constituency (abbreviated to BC)	The designation for a Parliamentary constituency containing a predominantly urban area.	Representations	The views provided by an individual, group or organisation to the BCE on its initial or revised proposals (or on the representations of others), either for or against, including counter-proposals and petitions.
County constituency (abbreviated to CC)	The designation for a Parliamentary constituency containing more than a small rural element.	Review date	The ‘effective date’ at which electorate and local government boundary data is fixed so that we can then work with it on a stable basis. Defined by the 2020 Act for the 2023 Review as 2 March 2020 for the electorate numbers, and 1 December 2020 for local government boundaries.
Designation	Official classification as either a borough constituency or a county constituency. The designation of a constituency guides the determination of who the returning officer will be, and determines how much candidates can spend, in any election for that constituency.	Revised proposals	The initial proposals as subsequently revised.
Electorate	The number of registered Parliamentary electors in a given area.	Rules	The statutory criteria for Parliamentary constituencies recommended by a Parliamentary Boundary Commission, as set out in Schedule 2 to the Parliamentary Constituencies Act 1986 (as amended by Acts up to and including the 2020 Act).
(Statutory/ Permitted) Electorate range	The statutory rule that requires the electorate of every recommended constituency to be – for the 2023 Review – between 69,724 and 77,062.	UK electoral quota	The average number of electors in a constituency, found by dividing the total electorate of the UK (less that of the five specific ‘protected’ constituencies in the UK) by 645.
Final recommendations	The recommendations submitted in a formal final report to Parliament at the end of a review. They may – or may not – have been amended since the earlier proposals in any given area.	Unitary authority	An area where there is only one tier of ‘principal area’ local council (above any parish or town council). Contrasted with those ‘shire district’ areas that have two tiers (i.e. both a non-metropolitan county council and a district/borough/ city council).
Initial proposals	First formal proposals published by the BCE during the review for public consultation.		
Periodical report	Report to Parliament following a general review of Parliamentary constituencies.		
Places of deposit	In each proposed constituency the Commission will make available hard copies of its revised proposals (including report and maps). The places of deposit where the public may inspect the proposals are usually the offices of the relevant local authority, although other public places such as libraries may be used. The Commission will publish a full list of places of deposit on its website.		

