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**Subject:** Conservative Party response - second stage - Greater London  
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[Conservative Party - second stage response - Greater London.pdf](#)

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To whom it may concern,

Please find attached the Conservative Party's response to the second consultation stage for the Greater London region, sent on behalf of Roger Pratt CBE, the Party's Boundary Review Manager.

Yours sincerely,  
Craig Aston

[Craig Aston](#)  
**Boundary Review Assistant**  
**Conservative Campaign Headquarters, 30 Millbank, London SW1P 4DP**

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3<sup>rd</sup> April 2012

Boundary Commission for England  
35 Great Smith Street  
London  
SW1P 3BQ

Dear Sirs,

**Second consultation period – Greater London Region**

We have much pleasure in enclosing our response to the representations received during the first consultation period on the initial proposals for the Greater London Region.

Yours sincerely,

  
Boundary Review Manager

## **GREATER LONDON REGION**

### **Submission of the Conservative Party regarding the responses to the initial proposals for the Greater London Region**

#### 1. **INTRODUCTION**

- 1.1 We note the large number of responses to the Initial Proposals in Greater London Region.
- 1.2 We note that almost one in ten of the submissions relate to changes in Hampstead and a large number of others relate to Wimbledon and Romford/Havering.
- 1.3 We note that many other submissions often have counter responses.
- 1.4 We will use as our guiding principles, the factors outlined in Rule 5 of the Rules for Redistribution of Seats – Schedule 2 to the Act.
- 1.5 In particular we will look at:
  - a) Geographical factors;
  - b) Local Government boundaries;
  - c) Existing constituencies;
  - d) Local ties that are broken from existing constituencies.

## 2. REGIONAL SUBMISSIONS

2.1 During our submission we make reference to the following full regional counter-proposals:

- a) Conservative Party (Representation 025302)
- b) Labour Party (Representation 025315)
- c) Liberal Democrat Party (Representation 025326)
- d) Adam Gray (Representation 018601)
- e) Kevin Larkin (Representation 019697)
- f) Dr. David Rossiter et al. (Representation 020996)
- g) Peter Smyth (Representation 017873)
- h) Peter Whitehead (Representation 019603).

2.2 Although we are not certain, we believe these to be the only full regional plans submitted. Where we refer to these proposals we do not include a reference number.

## 3. LABOUR

3.1 Overall the Labour Party submission for London is very disruptive of the region. There is however no noticeable gain as a result. Although we have slightly different figures we agree in principle with Labour's analysis in their Statistical Summary attached to their counter proposal. Their plans (see our attached Appendix) fail to recognise local government boundaries, move more voters than the Commission or any other major party, create one three borough constituency, and a two borough seat plus the City of London and have more „orphan' wards.

3.2 It is also significant that Labour have omitted from their London submission a final column in the Statistical Summary which appears in the papers of all other regions i.e. „unchanged constituencies’. They propose none, as opposed to the Commissions four and our five.

a) Labour’s sub-regional proposals

3.3 The London Labour Party’s submission for North London is rather similar to someone who is confronted by a car with two defects in the engine. Unfortunately in an effort to deal with the problems they take the whole engine apart discovering that when they put the engine together again that they have left pieces on the drive. In the Labour Party’s case they try to resolve Chingford and Edmonton and the City of London ’issues’ but leave all sorts of problems not least in Brent, Hampstead and Barnet. Equally unfortunately the original problems aren’t totally resolved in that Labour’s Chingford is in a form unacceptable to Waltham Forest Council (Representation 022214) and Rt. Hon. Iain Duncan Smith MP as outlined at the Newham hearing (Day Two, 9.06am, Pages 3-6) and the Liberal Democrats, the Conservative Party and Dr David Rossiter.

3.4 Labour’s same sub-regional proposal while splitting the City of London from Islington creates a three authority seat. We will deal with this subject in greater detail below.

3.5 Similarly the Labour proposal for South East London in an attempt to tackle two small relatively problems i.e. the internal Greenwich boundary and reuniting Welling, disrupt 12 seats and unnecessarily involve parts of Bromley borough in seats with both Lewisham and Bexley.

3.6 Their proposals are therefore worse in respect of Rule 5 (1) b and c.

4. LIBERAL DEMOCRATS

4.1 While we disagree with the Liberal Democrat counter proposal in detail we note that they have more regard for local government boundaries and existing seats in much the same manner as does the Commission. Both Tower Hamlets and Bromley have seats integral to each borough, Barnet is left unchanged within the borough and Bexley wards are unchanged from the Commission's proposals.

4.2 This counter proposal also explains at length and effectively why the Lea crossing at Chingford Edmonton is the least worst solution to this vexed problem.

5. ADAM GRAY

5.1 It is significant that Mr Gray proposes two seats wholly within the Borough of Tower Hamlets and also three seats coterminous with Bromley Borough. We also note that, in a paper notable for its limited comment, he says "I concur with the Commission's proposals for Barnet." Mr Gray therefore generally also advocates the use of the borough boundaries as proposed by the Commission.

6. KEVIN LARKIN

6.1 We welcome Mr Larkin's attempt to have regard for local government boundaries. Yet again his counter proposal respects the Bromley boundary creating three seats wholly within Bromley Borough. He has attempted to do away with „three borough' seats and „orphan' wards, both objectives which we welcome.

Unfortunately in an effort to achieve the lowest possible numbers of orphan wards Mr Larkin's plan results in a range of communities being split and some very odd seats e.g. 28 Greenford and South Harrow and 62 Woolwich West. This plan does

however emphasise that there should not be any increase in the number of orphan wards and certainly no three authority seats.

- 6.2 Mr. Larkin has also, again unlike the Labour Party, left unchanged a number of existing seats (four), albeit different ones from the Commission. This again recognises Rule 5 (1) c, a rule not observed by the Labour Party.

7. DR. DAVID ROSSITER ET AL

- 7.1 The submission by Dr. David Rossiter et al, while being unduly disruptive in places e.g. crossing the Thames at Battersea, has merits in that it generally acknowledges the importance of local government boundaries. As with the Commission's proposal it leaves Tower Hamlets unchanged and separate. Their plan also recognises that there should not be three authority seats unlike the Commission who propose a constituency of two boroughs and the City of London. Dr. Rossiter leaves Enfield substantially unaltered and Barnet totally unchanged. This submission also, crucially, includes the Chingford & Edmonton constituency as recommended by the Commission thereby acknowledging that it is the least worst solution to the issue of crossing the River Lea.

8. PETER SMYTH

- 8.1 It is generally difficult to comment on Mr Smyth's reasoning, since he generally doesn't provide any, but we have however commented on certain seats that he proposes.

9. PETER WHITEHEAD

- 9.1 As with Mr Smyth there is limited reasoning associated with Mr Whitehead's submission but we will comment on certain proposals.

10. OVERALL

- 10.1 The Conservative Party welcomes the general commitment by most of those who have made region wide submissions to:- respecting local government boundaries, minimal change where possible, the need to retain existing seats and if possible to combine these in the form of whole boroughs with existing seats within them e.g. Tower Hamlets and to only a slightly lesser extent both Barnet and Bromley.
- 10.2 In the full regional submissions not only is there a general respect for local government boundaries and existing constituencies, but there also appears to be a respect for tradition to the extent that, bar one personal regional submission, all counter proposals oppose the Commission's intention to end the link between the Cities of London and Westminster.
- 10.3 Across most of Greater London it is notable that taking area by area, generally at least two of the three major party submissions support the proposals published by the Commission in September 2011.
- 10.4 We therefore believe that any changes to the Commission's Initial Proposals should be limited to adjustments in certain specific areas.
- 10.5 We will now look at each London Borough and the City of London in turn although we may need to mention seats in both the Boroughs in which they are proposed.



## 11. BARNET

- 11.1 Dr. David Rossiter, Adam Gray, Peter Whitehead, the Liberal Democrats and the Conservatives all agree with the Commission that the constituencies within Barnet should remain unaltered. All believe that two of the proposed constituencies, Hendon and Chipping Barnet, should be completely unchanged. This is most compliant with Rule 5 (1) c.
- 11.2 We note that the overwhelming majority of submissions from within Barnet Borough support the Commission's proposals including those by a series of Barnet councillors including Cllr Cohen (Representation 006053), Cllr Old (Representation 006370) and Cllr Salinger (Representation 006994).
- 11.3 Cllr. Old in his response covers one of the few issues of contention i.e. which ward to link with the Finchley & Golders Green seat. The Commission proposed a link with Fortune Green in Camden. This proposal has received substantial opposition from Camden but there is an alternative. As Cllr Old suggests the link could be with Fortis Green from Haringey.
- 11.4 We note that Dr. Rossiter in his submission also suggests Fortis Green should replace Fortune Green as an alternative and that both of these support our original submission.

## 12. ENFIELD

- 12.1 Despite the many objections concerning the proposal to link Chingford with Edmonton we note that very few of those who objected to the link propose an alternative. This includes Enfield Council (Representation 020606) who acknowledge that they are „not able to offer alternatives’. We also note that even

where alternatives are proposed these are inconsistent in their format. The Labour Party proposal is also seriously disruptive to Haringey, other parts of Enfield and Barnet where local opinion supports the Commission's status quo proposal.

- 12.2 We note that Mr. Whitehead, the Liberal Democrats and Dr. Rossiter support the Commission in their proposal to link Chingford and Edmonton.
- 12.3 The Liberal Democrats cover the issue of the Lea Valley crossing in great detail in their regional submission from 2.13 to 2.18 and then again later under separate borough headings. This is probably the most detailed analysis submitted on the subject. We totally concur with the comments in 2.18 where the Liberal Democrats say "we understand that this proposal has proved controversial... in principle we agree that this admittedly awkward cross river seat is an acceptable solution, chiefly because it enables many seats surrounding it to meet the statutory considerations well." They say some two pages later at the end of 3.3 "some form of Chingford & Edmonton constituency is in our view a sound proposal..."
- 12.4 We also note that there are many objections to Chingford being linked to Edmonton because of the mile between residential properties. A distance which is exceeded between housing in Newham Borough and the nearest homes in Poplar. Cllr Aston in his evidence (Day Two, Newham hearing, 11.10am, Pages 28-32) referred to "a gap of over a mile between the last house in Tower Hamlets and the first in West Ham."
- 12.5 We note that both the Liberal Democrats and Dr Rossiter agree with our submission and believe there is no need to change either the proposed Enfield Southgate or Enfield North. This is minimum change from the existing constituencies. The

Labour Party propose more radical change to the constituencies this therefore being less compliant with Rule 5 (1) c.

13. WALTHAM FOREST

13.1 Even amongst the differing comments in relation to Chingford & Edmonton there was generally a clear view that the Commission's proposal for Chingford needed to be altered by a simple ward swap.

13.2 Despite other comments regarding the proposed Chingford & Edmonton constituency, both Waltham Forest Council and the Rt. Hon. Iain Duncan Smith MP identify the need to swap Highams Hill ward for Hale End & Highams Park ward. It is striking that in a submission from Cllr Chris Robbins the Labour leader of Waltham Forest Council (Representation 022214) on behalf of all three political parties he says "The proposal to swap the Higham Hill and Hale End & Highams Park wards between the proposed Walthamstow and Chingford & Edmonton constituencies is at best illogical. Higham Hill is geographically and in terms of community part of Walthamstow... The converse is equally true of most of Hale End & Highams Park." On page 4 the Council continues "... Walthamstow 1. Include Higham Hill in this constituency. 2. Move Hale End & Highams Park ward to any (our emphasis) proposed future Chingford constituency."

13.3 We note that these comments from all parties on the local council coincide with the position of the Conservative Party, the Liberal Democrats and Mr Smyth. The wards of Higham Hill and Hale End & Highams Park should revert to their existing constituencies of Chingford and Walthamstow respectively. Just this one ward ward

swap means 15,527 electors are retained in their existing constituency this being more compliant with Rule 5 (1) c.

13.4 We also note that the regional Labour Party's submission is contrary to that submitted by Labour controlled Waltham Forest. It is therefore clear that Labour's huge overhaul of North East London fails at its core in Chingford.

14. REDBRIDGE

14.1 The other element of the Labour plan in this area which is supported by no other submission is the splitting of Wanstead and Snaresbrook wards. It was clear from evidence by Mr. Nick Hayes at the Newham Public Hearing (Day One, 11.12am, Page 5) that much of what is regarded as Wanstead is situated in Snaresbrook ward including Wanstead High Street. His observation was that "Snaresbrook ward and Wanstead ward are indivisible." This is supported for example by the submission of Mr Tim Lewis (Representation 002525).

14.2 Most of the respondents including Kevin Larkin, Peter Smyth and the Liberal Democrats welcome the Commission proposal to recreate the historic seat of Wanstead and Woodford including both the Wanstead wards. This proposal also respects the local government boundary between Redbridge and Waltham Forest which is currently crossed twice. As the Liberal Democrats note „we welcome the return of a Wanstead and Woodford constituency including all the natural community between Wanstead Flats and Epping Forest to the west and the River Roding to the east'. Amongst others Ms Stephanie Alexander (Representation 005649) also supports this proposal.

14.3 We also note that Lee Scott MP (Representation 001901), Cllr. Keith Prince (Representation 002342) and Cllr. Tania Solomon (Representation 002677) support the Conservative proposed swap of Clayhall and Newbury wards between Wanstead and Woodford and Ilford North.

15. BARKING AND DAGENHAM AND HAVERING

- 15.1 As far as we can establish there are four proposals for the area of Havering and Barking & Dagenham; the Commission's initial proposal, that of Mr Whitehead, Mr Peter White (Representation 003600) and Andrew Rosindell MP's alternative which we support. We oppose both Mr Whitehead and Mr White's proposals for the same reason that we oppose that of the Commission – they are too disruptive. The Party supports Andrew Rosindell MP's proposal as outlined at the Newham hearing (Day Two, 10.54am, Pages 24-27) and confirmed in our submission. This proposal has the advantage that it results in one more constituency, Hornchurch and Upminster, remaining unchanged (thereby making a total of five in our proposal) and another, Romford, is retained in its existing form with only one ward added.
- 15.2 This better meets the requirements of Rule 5 (1) c and d and 104,103 electors are retained in their existing constituency.
- 15.3 We hope that the Commission will take note of the very significant level of representations in favour of this proposal including that submitted on behalf of Havering Council (Representation 024083) and many councillors and residents including Miss Pigram who gave evidence at East Ham (Day Two, 9.45am, Pages 15-17).

16. NEWHAM

16.1 We support the Commission in their proposals for Newham and believe that Labour's plans for the borough result in an unnecessary and unacceptable disruption of Tower Hamlets' constituencies. Their plan also increases from three to four the number of seats within Newham, this being worse under Rule 5 (1) b.

17. TOWER HAMLETS

17.1 Again we note that, as far as we can establish, every submission from within Tower Hamlets that relates to the Borough support the Commission's proposal to retain two seats integral and unchanged to the borough of Tower Hamlets. This view is supported by the elected Independent Mayor of Tower Hamlets Lutfur Rahman (Representation 011836) and appears to have broad cross party support.

17.2 Mr. Aman Dalvi (Representation 022075) writing as interim Chief Executive on behalf of the Council (which has representatives from five political groups) "welcomes [your] proposal to retain the two current Parliamentary constituencies... and to leave untouched the boundaries... whose constituencies are wholly contained within the borough." Cllr Jones (Representation 013556) also identifies how a housing trust and many charities operate across the Isle of Dogs but include her own ward of St Katherine's and Wapping.

17.3 We also note that a residents group from the Isle of Dogs has also written in support (Representation 007782) despite it being incorrectly recorded as „disagree’.

17.4 From within the borough there are no alternatives from any political representatives. As we have noted previously, the Liberal Democrats support the Commission not only in their lengthy analysis of the Lea crossing issue but also

under 3.3 Tower Hamlets they say “The Tower Hamlets seats remain unchanged which reflects well the statutory considerations of respecting local government boundaries, local ties and the existing pattern of constituencies.”

17.5 We therefore support both constituencies, Bethnal Green and Bow and Poplar and Limehouse, remaining unchanged as proposed by the Commission. This is most compliant with Rule 5 (1) b and c.

18. CITY OF LONDON

18.1 There is near universal support for retaining the link between the City of London and Westminster. The Commission heard the views of the Corporation from Mr Mark Boleat during the Kensington hearing (Day Two, 10.03am, Pages 3-5) and it has made its own submission (Representation 025243). These views have been supported by all political parties and David Rossiter, Peter Smyth and Kevin Larkin. There are many other submissions that make the same point.

18.2 We therefore believe that a change of alignment away from City of London-Islington to City of London-Westminster is necessary and that as a result this is the one part of London where a slightly more substantial reorganisation of seats will be necessary.

19. HACKNEY AND ISLINGTON

19.1 In opposing the City of London-Islington link most submissions appear to favour an expansion of the Holborn wards to compensate for the loss of electorate in the City. We share that view and believe that this provides the opportunity not only to unite Holborn but also Stoke Newington.

20. CITY OF WESTMINSTER

- 20.1 As has been noted above there is overwhelming support for the proposal to reunite the Cities of London and Westminster. We do not intend to repeat that view here. We hope and expect that the Commission will recognise this general expression of view and will make the necessary adjustments.
- 20.2 Throughout the country the Commission has displayed a general desire to ensure that, unless for totally compelling reasons, unitary authorities, London boroughs and metropolitan boroughs should not be linked through three authority seats. Mr Larkin we note specifically identifies this as something which should be avoided and has (like ourselves) proposed no seat involving more than two local authorities. We note that the principle is also acknowledged by Dr Rossiter who proposes a two authority seat which links the key retail and entertainment areas of Oxford Street and theatreland. He achieves this by uniting what might be described as the Marylebone wards of Bryanston & Dorset Square and Marylebone High Street and the theatreland wards of St James and West End. It should also be noted that these these wards constitute the main retail areas of Oxford Street and Regent Street. While we believe these links are important, unfortunately Dr. Rossiter achieves this by creating a seat which crosses the Thames at Victoria, a proposal which we believe is, while interesting, inappropriate and disruptive.
- 20.3 Mark Field MP in his oral submission at the Kensington hearing (Day One, 12.16pm, Pages 31-37) outlined better changes which would also have the benefit of resulting in a two authority seat. While he covered the whole aspect of the



proposed changes as it relates to Westminster this has since been supported by Westminster City Council (Representation 021403) and others.

- 20.4 Ms. Rowley in her submission to the Kensington hearing (Day One, 2.45pm, Pages 53-54) explained from a residents point of view how the wards of Bryanston and Dorset Square and Marylebone High Street could regard themselves as being a community while being at the centre of a major metropolitan area and therefore why they should be kept together.
- 20.5 We therefore propose the constituency with just the City of Westminster and the City of London which, because it retains more electors from the existing constituency, breaks fewer ties in Marylebone and consists of two local authorities rather than three, is more compliant with Rule 5 (1) b, c and d.

## 21. KENSINGTON AND CHELSEA

- 21.1 Although in different forms, having only involved the authorities of Westminster and the City of London in the creation of a Cities of London & Westminster seat Mr Larkin, Mr Smyth and Dr Rossiter propose that the Royal Borough of Kensington and Chelsea should only include two constituencies. They therefore create what can best be described as a „Kensington’ constituency. Given the very small total electorate in this borough this is to be welcomed. At the Kensington hearing both Cllr Buckmaster of the Kensington & Chelsea Council (Day Two, 1.27pm, Pages 41-42) and Sir Malcolm Rifkind MP (Day Two, 1.15pm, Pages 38-41) in their evidence to the Kensington hearing clearly identified the need for a „Kensington’ constituency as did Mr Bell (Representation 014246) in his written submission. Others argued similarly.

21.2 We therefore believe that the Conservative Party proposals for a Kensington constituency has received support and should be implemented. As in Westminster more electors are retained in their existing constituency fewer local ties are broken and the proposed seat consists of two authorities rather than the three so our Kensington proposed seat is more compliant under Rule 5 (1) b, c and d.

22. CAMDEN

22.1 We believe there are more submissions from the existing Hampstead and Kilburn constituency than any other seat in London and that they are almost unanimously opposed to the Commission's proposals. We note that virtually every submission appears to support Belsize and Fortune Green wards being together in a Hampstead constituency, although where an alternative is put forward we note the precise form of a 'Hampstead' seat varies.

22.2 In the submissions it is clearly identified that West Hampstead and Fortune Green fit together, with many 'West Hampstead' related venues being situated in Fortune Green not least the police and railway stations. David Douglas in his submission to the Brent hearing (Day One, 12.38pm, Pages 12-15) made this point, as do Liberal Democrat councillors Russell Eagling (Representation 019187) and Nancy Jirira (Representation 019368). Cllr Mike Katz (Representation 018944) writes as a Labour councillor but also identifies that all three political parties have written jointly to object to the proposed splitting of West Hampstead and Fortune Green.

22.3 Cllr Katz (Representation 018944), as do others, also covers Belsize ward which is identified as being at the centre of Hampstead. The three party letter also covers the Belsize issue.

- 22.4 Given the local, all party, comments regarding Fortune Green and Belsize it is clear that both the Liberal Democrat and Labour regional submissions are at variance with the views of the local councillors of all political persuasions. They are also at variance with Pete Whitehead, Peter Smyth, Kevin Larkin, David Rossiter and the Conservative Party on this matter.
- 22.5 We also note that Labour propose a second unacceptable three authority seat, on this occasion with Hampstead at its core linking Camden, Brent and Haringey (City of London-Westminster-Kensington being the first). The Commission, the Liberal Democrats and the Conservative Party have proposed no seat in which three London boroughs are combined which we believe is more compliant with Rule 5 (1) b, and on these grounds we also disagree with the “three authority seats” the Commission and the Liberal Democrats propose.
- 22.6 More surprisingly and disappointingly Labour’s three authority seat also uses two separate ‘orphan’ wards i.e. Kilburn (Brent) and Highgate (Haringey). We particularly note that the Chair of Hampstead and Kilburn Labour Party Mr Neil Nerva argued at the Brent hearing (Day Two, 9.19am, Pages 3-5) against ‘orphan’ wards and also against three authority seats. Labour’s proposal therefore does not address either of Mr Nerva’s concerns. Similarly both Dr Rossiter and Mr Larkin have argued three authority seats and Mr Larkin against orphan wards.
- 22.7 We therefore support a Hampstead seat including Belsize and Fortune Green wards which is less disruptive to the existing constituency and breaks fewer local ties thereby being more compliant with Rule 5 (1) c and d.

23. HARINGEY

- 23.1 As previously noted Dr Rossiter and the Conservative Party support, the inclusion of Fortis Green ward in an expanded Finchley and Golders Green constituency which is the existing constituency plus one ward. Not only does this tackle the large number of objections to splitting Fortune Green and West Hampstead wards but it also helps limit the disruption to the Haringey communities. Both proposals keep Wood Green together, use the main railway line as a boundary and also keeps Tottenham as an entity.
- 23.2 The regional Liberal Democrat proposal transfers the disadvantage of the Commission's proposal i.e. Stroud Green's isolation from the remainder of the Tottenham seat to the other side of the railway line by bringing in Haringey ward to a western constituency. As noted previously this railway is also used as a boundary by both Dr Rossiter and Mr Larkin. The Liberal Democrats also significantly split the Wood Green community. The three wards of Bounds Green, Noel Park and Woodside which make up Wood Green are currently together in the existing Parliamentary seat and have been kept together under the Commission proposals. This should continue as it is more compliant with Rule 5 (1) c and d.
- 23.3 We note that the Labour controlled Haringey Council have written (Representation 023249) seeking „maximum congruence between Parliamentary representation and borough'. The regional Labour submission is however the only one of the major parties or the Commission to propose splitting Haringey into four different seats this being worse under Rule 5 (1) b. The fourth being the „orphan' ward of Highgate in their Hampstead, Highgate and Kilburn constituency. Labour's

proposal, while it has the merit of using the main railway line dividing Stroud Green and Harringay wards as the boundary, it has the demerit that it splits Tottenham between two seats. Given the events of last year surely this is a community which needs to be kept together to ensure a clear voice in the public domain.

23.4 We therefore support the Commission's proposed Hornsey and Wood Green with the swap of Fortis Green for Stroud Green, and the Commission's proposed Tottenham with the swap of Stroud Green for Seven Sisters, which better reflects the borough boundary.

24. BRENT

24.1 We note that the Labour Party not only use an orphan ward (Kilburn) for the Hampstead seat they also use two further Brent wards Welsh Harp (Hendon) and Queensbury (Stanmore) as orphans for constituencies in other boroughs. This cannot be acceptable.

24.2 The Liberal Democrats and the Conservatives have developed the Commission Wembley & Perivale seat which is in essence, Brent above the North Circular. The Liberal Democrat proposal does not however help create a 'Harrow constituency' and leaves one orphan ward.

24.3 Labour however propose a Wembley and Perivale seat which runs north west to south east across Brent. It therefore fails to take advantage of the North Circular as a major means of communication in the area. It would therefore be difficult to serve as Member of Parliament. This constituency also uses two Ealing wards (Perivale and Hanger Hill-not Hanger Lane as written) which have no common interest, share

virtually no common boundary and which are divided by both a river and the A40.

We note that Mr Michael Elliott the former Labour MEP – not a former Conservative MEP as stated in the transcript – in his evidence to the Brent hearing (Day One, 11.24am, Pages 8-10) identified that it is however acceptable to include the one ward, Perivale, in the constituency since part of the ward used to be within Brent.

24.4 We note that the other Labour proposed constituency, Willesden, also stretches almost the full length of Brent, virtually from Harrow centre to Kensal Rise linking areas which are very diverse and share no sense of community.

24.5 In his oral evidence at Brent Mr Neil Nerva Chair of Labour’s Hampstead & Kilburn party argued that Brent should not be used as a top up to other seats. Labour seem to have used Brent as just that.

24.6 We also note that Mr Larkin has argued against orphan wards, while it is clear that the Commission, the Conservative Party and the Liberal Democrats have attempted to keep them to a minimum. We can find no example anywhere else in England where a single, relatively small authority, should have three different orphan wards within its boundaries.

24.7 We therefore support the Commission’s proposals for the Brent constituency of Willesden and the revised seats of Harrow North, Harrow South and Wembley and Perivale as redrawn by the Conservative Party.

## 25. HARROW

25.1 We note that Mr Whitehead, the Conservative Party and Dr Rossiter suggest a specifically Harrow constituency. It is also significant that Cllr Bill Stephenson in

his submission on behalf of the Labour (majority) group on Harrow Council (Representation 023169) argues that Harrow constituencies “should consist totally of Harrow wards... but that is not possible”. The Conservative Party and others have shown that it is possible to produce a specifically Harrow constituency without detriment to others.

- 25.2 Marilyn Devine in her evidence to the Brent hearing (Day One, 12.35pm, Pages 11-12) argued against a linking of Headstone South with Ruislip. While as a resident of Headstone South she wanted to be linked with Harrow centre we do not believe it would be appropriate to create a seat where the two Headstone wards were separated. They are clearly linked, by name, and by community. It is however possible to create a Harrow seat including both.
- 25.3 We note that (amongst other councillors) Cllr Suresh, a Labour councillor for Headstone South (Representation 023142) also argued against linking Headstone South with Ruislip but he went further by suggesting that Rayners Lane should be exchanged for his ward in the Ruislip, Northwood and Pinner seat. We believe that such an exchange can only take place if all three wards of Rayners Lane, Roxbourne and Roxeth are transferred since the majority of the voters of Rayners Lane are to the south west of the railway line as is the case with the other two wards. This is therefore a community of these three wards.
- 25.4 While we do not intend to go into detail here we would refer to the evidence given by Bob Blackman MP at the Brent hearing (Day Two, 9.46am, Pages 10-13) identifying the logic for the structure of the new constituencies. We would also note that several councillors from Brent including Cllr Colwill (Representation 023216)

wrote to support the proposal from the other affected borough i.e. Brent. We would change the names of the proposed Stanmore and Harrow seats which would now be titled Harrow North and Harrow South. With Harrow North seat being totally within the Borough while the Commission have no seat totally within the Borough the Conservative proposal is more compliant with Rule 5 (1) b.

26. HILLINGDON

- 26.1 We note that Hillingdon Borough Council (Representation 021046) support the Conservative Party proposed seats of Ruislip, Northwood and Pinner and Harrow North. They suggest the inclusion within this constituency (Ruislip, Northwood and Pinner) the “five Harrow wards that physically abut Hillingdon” which they describe as having “stronger geographical link by means of public transport.” They further indicate that the two Headstone wards and Hatch End look towards Stanmore rather than towards Ruislip.
- 26.2 In the south of Hillingdon borough the Liberal Democrats suggest tackling the Feltham & Hayes constituency which they suggest is a problem since it consists of two communities separated by Heathrow airport. Unfortunately the Liberal Democrat alternative includes Heathrow Villages ward where the overwhelming majority of the voters are north of the airport. This really would be an extreme case of an orphan ward with the voters left adrift from all other electors in a seat. We note however that one submission welcomes the seat and suggests that its name should be Heathrow.
- 26.3 With the proposed change to the Ruislip, Northwood & Pinner seat identified above (see Harrow) we support the Commission in their plans for Hillingdon.



27. EALING

- 27.1 In his oral, lucid and well argued evidence to the Brent hearing (Day One, 11.24am, Pages 8-10) Mr Michael Elliott, a former Labour MEP also with substantial experience of serving Ealing Borough, supported the Commission's proposal to link the two Hillingdon wards with Northolt and identified that part of Lady Margaret ward used to be in Greenford. He also explained why Perivale might fit into a neighbouring constituency (see Brent above) and commented that the Commission's proposed seat of Ealing "brings together some natural communities and area", going on to describe the inclusion of South Acton as "reasonable". Mr Elliott's views coincide with a series of submissions from Ealing in general and Hanger Hill in particular. Ann Chapman (Representation 005103) and Ian Potts (Representation 006565) cover a range of Ealing matters and explain why the Commission is correct in its Ealing format, while Cllr. Ben Dennehy (Representation 005319) specifically identifies Hanger Hill residents as being within Ealing particularly since the ward includes Ealing Golf Course.
- 27.2 As stated above we do not support the Labour proposals to use Hanger Hill ward, which Labour refers to as Hanger Lane, in a Wembley constituency. Neither the Labour submission nor any other that we can trace show that Hanger Hill has links with Harlesden in south Brent nor parts of Sudbury in north west Brent. The Labour Party splits Hanger Hill from Ealing and breaks local ties which make it worse in terms of Rule 5 (1) d.
- 27.3 Representations from, amongst others, John McDonnell MP (Representation 023067) and the London Regional Liberal Democrats (Representation 025326), in

an effort to make changes elsewhere around Heathrow, propose splitting Southall.

We believe that Southall is now a distinct community which is currently united in a single constituency and should remain so. We note that the regional Labour Party also share that view.

27.4 We therefore support the Commission in its proposals for Ealing.

28. HAMMERSMITH AND FULHAM

28.1 We note that Hammersmith and Fulham Council (Representation 019046) expresses overall support for the Commission's initial proposals and then attaches the results of the survey in which 72% of those surveyed approved.

28.2 While the Labour Party objected to College Park and Old Oak ward being part of a separate constituency we note that Mark Loveday (Representation 003328) says that it is "largely divided from the rest of the borough." The ward is in fact a series of disparate communities around Wormwood Scrubs, Westway and rail junctions with one of the wards polling districts clearly looking towards to Brent borough. While not ideal we believe that this does enable other seats in West London to be formed of logical centres and communities.

28.3 We note that the Liberal Democrats propose a link between Hammersmith and Fulham and some Hounslow wards. This is not a link that has existed previously in constituency terms nor are there strong links in council terms. We note that Dr Rossiter supports a link with Ealing which recognises the previous links although in a slightly different format.

28.4 We therefore support the Commission in the plans for the seats of Chelsea and Fulham, Hammersmith and Acton and Willesden.

29. HOUNSLOW

29.1 We note that Mr Larkin, Mr Smyth, Mr Gray, Mr Whitehead, the Regional Labour Party as well as the Conservative Party recognise that the boroughs of Hammersmith & Fulham and Hounslow should not be paired. The Commission has met well Rule 5 (1) c by retaining the existing constituency of Brentford and Isleworth and solely reducing it by one ward at its westward end. This also enables the seat to continue to take account of Hounslow's local government boundaries.

29.2 As Mary Macleod MP said in her evidence to the Kensington hearing (Day Two, 10.44am, Pages 7-9) the Commission's proposal 'makes sense' and results in 'minimal change'. We also concur with her proposal that the seat should be called Chiswick, Brentford and Isleworth.

29.3 As has been noted above there have been alternative proposals from both the Liberal Democrats and John McDonnell MP to redraw the area around Heathrow including the western part of Hounslow. We believe, as does the Labour Party, that the proposed Teddington and Hanworth seat as drawn by the Commission should remain but we would propose that it would be better named Hampton Court as did John Soones (see below).

30. KINGSTON UPON THAMES AND RICHMOND UPON THAMES

30.1 We note that the Labour Party supports the Commission's proposal for both Richmond and Kingston. We also note that there have been similar views expressed by, amongst others, Martin Seymour (Representation 018604) and John Soones (Representation 002449) who in a submission, that pre-dated our proposal at the Kensington hearing, put forward the name of Hampton Court. Cllr Sam Geoffrey

(Representation 021170) regrets the passing of Twickenham but believes “it is right (and will be popular) to add four Twickenham wards to Richmond Park”. He also notes an acceptance that the other borough wards should go into a constituency linked with Hanworth but also suggests the name change to Hampton Court.

30.2 We note that the Liberal Democrats do not include one Twickenham ward (West Twickenham) in Richmond and Twickenham and instead include one Hounslow ward of Isleworth. We can see no justification for this proposal which breaks local ties in Twickenham and is worse under Rule 5 (1) b, c and d.

30.3 We also note that there is general support for the proposed Kingston constituency from all major parties and Adam Gray and that Howard Jones (Representation 012516) and Kenneth Smith (Representation 012527) have expressed local support for the Commission’s proposals.

### 31. MERTON

31.1 We note that the Labour Party support the Commission’s proposals for Merton as does the Conservative Party and Mr Gray.

31.2 The Liberal Democrat proposals place Merton in five different constituencies, one more than that proposed by the Commission. It also splits the community of Mitcham. Several speakers at the Wandsworth hearing including Siobhain McDonagh (Day One, 1.25pm, Pages 28-29) gave evidence that Mitcham constituted eight wards within Merton. Although the eight were not specifically listed it is clear that the three wards which the Liberal Democrats propose to be linked with Carshalton are regarded as core to any Mitcham seat. The effect of the Liberal Democrat proposal would therefore be to split Mitcham.

- 31.3 It is noted in Peter Smyth's submission he says "The Mitcham area will be included in a cross borough constituency with Hackbridge". He then later lists the wards from Merton for his Mitcham and Hackbridge seat i.e. "Cricket Green, Figges Marsh, Graveney, Longthornton, Pollards Hill, Ravensbury". Three of these six wards are split from the other three under Liberal Democrat proposals and even they acknowledge in their submission "links with Cricket Green and Pollards Hill are more tenuous and there are inevitable splits in local ties." (our emphasis) Cricket Green ward cuts into the centre of a highly developed area and any separation of that ward from Figges Marsh and Lavender Fields would make no sense since it would be splitting the main shopping area.
- 31.4 Later in their submission the Liberal Democrats comment on their proposed Mitcham and Tooting seat referring to „the northern Mitcham wards’. This highlights that even they acknowledge their proposed seat includes only part of Mitcham.
- 31.5 Labour councillor Mark Allison (Representation 019273) states of the Commission's proposed seat "Although I would prefer it if there were no change at all, if Mitcham and Morden were forced to find 3 extra wards it would be hard to disagree with the three that have been added." The Conservative Party therefore believes that all the evidence, including that from the Liberal Democrats, indicates that their Mitcham proposal is unduly disruptive of local ties as well as being worse in terms of local government links so it is worse under Rule 5 (1) b and d.
- 31.6 We also note there are many submissions from „south Wimbledon’. While we have much sympathy with the residents of Abbey and Trinity wards we believe the

alternative options split communities elsewhere. We do however repeat our proposal that the constituency be renamed Mitcham and South Wimbledon.

32. SUTTON

- 32.1 We note that the Commission has proposed two balanced constituencies which are supported not only by the Conservatives but also by the Labour Party. Croydon Central is almost exactly 50% from each borough and Purley & Carshalton is 65-35. In the Liberal Democrat counter proposal they make great play of re-uniting communities however, as identified above Mitcham is split, it would also leave Beddington South as an orphan ward in their proposed Croydon South. The Liberal Democrats' Carshalton & Wallington seat is roughly 80-20 between Sutton and Merton. This seat would also require a Member of Parliament to enter Croydon South to serve the Clockhouse area of Sutton whereas the Commission's proposal resolves this anomaly, a point made by Cllr Tim Crowley (Representation 017939).
- 32.2 We also note that the Liberal Democrat plan links Sutton with Merton in two constituencies and with Croydon in another, it also however requires Croydon and Lambeth to be linked whereas the Commission proposal does not.
- 32.3 Cllr Mark Allison (Representation 019273) from whom we quote above also makes the observation that "The Commission's recommendations would mean that 100% of Sutton and Cheam would be kept together, and 80% of Mitcham & Morden would also be together."
- 32.4 We therefore support the seats as proposed by the Commission of Sutton and Cheam, Croydon Central and St Helier and Purley and Carshalton.

33. CROYDON

- 33.1 We note that in the case of Croydon, Lambeth, Merton and Sutton the Labour Party support the Commission's initial proposals as does the Conservative Party. The Liberal Democrats propose four cross borough links in this area whereas the Commission propose three. We support this more limited crossing of boundaries. Two of the three „Commission' links are with Croydon and it should be noted that Croydon and Sutton are linked on the Greater London Assembly, a point made by the GLA member for the two boroughs Cllr. Steve O'Connell where (Representation 009293) he says “it is a sensible choice to pair Croydon with Sutton which have similar communities.”
- 33.2 As was argued by Gavin Barwell MP at the Wandsworth hearing (Day One, 11.20am, Pages 8-12) the proposed seats for Croydon are natural constructs for the area and “link well with the areas of Sutton proposed.” As he indicated Croydon serves much of Sutton borough both for shops and jobs.
- 33.3 We further note that a large number of Croydon councillors have written supporting the Commission including Cllr Hilley (Representation 010001) who is a member for Waddon ward in central Croydon and identifies that Waddon and Beddington areas were linked prior to the creation of the two boroughs of Croydon and Sutton. Cllr Pollard (Representation 010780) has identified that the proposed changes to the east of Croydon centre also make sense in that there have been well established links between Heathfield and Selsdon. In many cases we also note that it is suggested that the name of the seat is changed to Croydon East and New Addington

which we support. This is a change supported by the councillor for New Addington, Cllr. Pearson (Representation 009886).

33.4 Gavin Barwell MP in congratulating the Commission for their proposals made the observation that to cross into Lambeth “would break up the community of North Croydon.” We note that the Liberal Democrats would split this community and would in altering the Commission’s initial proposals unnecessarily involve a further borough – Lambeth.

33.5 We therefore support the proposals of the Commission as they relate to Croydon Central and St Helier, Croydon North, Purley and Carshalton and Croydon East renamed as Croydon East and New Addington.

34. LAMBETH

34.1 We note that both the Conservative and Labour Parties supports the Commission’s proposals and that Lambeth Council in lodging its comments (Representation 023235) has suggested no alternatives. It would therefore seem appropriate to retain the seats as proposed.

34.2 We do however consider that the counter proposal elaborated at the Wandsworth hearing by Keith Hill (Day One, 2.47pm, Pages 30-33) has real merit. Mr Hill proposed that four wards rotate around constituencies but within Lambeth i.e. Larkhall ward into Battersea and Vauxhall, Clapham Town ward into Clapham Common, Streatham Hill ward into Streatham and Tooting and Gipsy Hill ward into Brixton. This counter proposal brings both Clapham and Streatham together better than the original Commission scheme without disrupting the overall plan. In the case of Clapham, the wards of Common and Town would be in the same



constituency as suggested by the Liberal Democrats and reduces the split of Streatham from three to two seats.

34.3 We do not however take the same supportive approach to the smaller and somewhat different counter proposal suggested by Kate Hoey MP which would link Clapham Town ward through a narrow neck of land into a seat with which it shares little in common.

35. WANDSWORTH

35.1 Again we note that both the Labour Party and the Conservative Party support the Commission proposal in this borough. We also note that Wandsworth Council in a very full response (Representaion 010436) have supported the Commission's proposals with two minor changes. Wandsworth Council propose a change of name with which we agree i.e. that the Clapham Common constituency would be better named Wandsworth and Clapham Commons.

35.2 We note that the Liberal Democrats wish to move Northcote ward into a Battersea seat. As they note this is a „between the parks' ward. If the Liberal Democrat proposal was accepted it would leave the two Commons – Clapham and Wandsworth linked but without the natural link.

35.3 We also note that two of the Liberal Democrats' concerns about the Commission's proposals in this area i.e. the linking of the Clapham Common and Town wards and the reduction in the separation of the Streatham wards could, if it was felt necessary, be better resolved by the adoption of Keith Hill's proposal referred to above.

36. SOUTHWARK

- 36.1 While the Liberal Democrats and the Conservative Party support the Commission's proposals for the whole borough and Mr Smyth supports both Bermondsey and Waterloo and Camberwell and Peckham seats, we note that the Labour Party wish to disrupt the links of the four Peckham wards (Peckham, The Lane, Livesey and Nunhead – the majority of whose electorate is from historical Peckham).
- 36.2 We note and agree with the Liberal Democrat comment that „We particularly like.... the new Dulwich and Sydenham seat. The two constituent parts are well matched and each is a coherent community that can be separated from their respective boroughs without any great issue'. This generally coincides with the views expressed by Cllr Mitchell (Representation 016801) where he notes that the use of Peckham Rye ward “partially recreates the old (pre-1997) Dulwich seat. The seat then extends naturally east along the south circular to include Forest Hill and Sydenham.”

37. LEWISHAM

- 37.1 We oppose the Labour Party's disruptive plan for South East London. We note that the Liberal Democrats endorse the Commission's creation of a Greenwich/Deptford seat when they “strongly endorse the decision to link Greenwich and Deptford/New Cross.” We also note that both Mr Larkin and Mr Smyth create, in some form a Greenwich and Deptford seat. Mr Smyth calls the seat Deptford and Greenwich “containing New Cross, Deptford, Greenwich and Blackheath.”
- 37.2 We also note that while Lewisham Council have written to the Commission (Representation 022222) there is a three party representation listed in the name of

Cllr Maines (Representation 018591) the Liberal Democrat leader, which expressed disquiet about the manner in which the representation from Lewisham Council was prepared and submitted.

37.3 We therefore note that both the Liberal Democrat and Conservative parties supports the proposals from the Commission and that others have relatively similar seats and that there should therefore be no change to the plans as initially proposed.

38. GREENWICH

38.1 We note the Liberal Democrat plan supports the Commission's riparian structure of seats while the Conservative Party supports the Commission plan in full. We believe that the Commission's proposal successfully links the Blackheath wards and the overwhelming majority of the historic Deptford-Greenwich areas. We note particularly that all sides of Blackheath are in one constituency.

38.2 We do not believe an Eltham seat should stretch through Plumstead to the river, as is proposed in the Labour submission. We note that on the web page for Eltham Labour Party there is no reference to Plumstead even in the 'news in your area' section even though the current seat includes Shooters Hill ward which appears to be the basis for the Labour justification for uniting Plumstead in Eltham. Dermot Poston (Representation 024065) in his submission makes the point that Plumstead is separated from Eltham and that only a small part of Shooters Hill ward might be considered part of Plumstead. The two core Plumstead wards of Plumstead and Glyndon are together in the Commission's proposals.

- 38.3 We also do not accept that Kidbrooke with Hornfair is a Blackheath ward. The overwhelming majority of this ward is the Kidbrooke estate and therefore it cannot reasonably be argued is linked with the historic Blackheath area.
- 38.4 If the Commission is minded to consider some slight change in the form of the Greenwich wards we would commend the Liberal Democrat alternative. There were substantial objections to the exclusion of a small area of central Greenwich, which is in Peninsula ward, from a Greenwich and Deptford seat. By including Peninsula ward in this seat these, we believe, somewhat overstated objections could be removed. Equally we believe (as shown above) that there is not a case for bringing Plumstead into the Eltham constituency but the Commission may decide to bring Shooters Hill ward into the proposed Woolwich constituency. This would be compensated for by taking Blackheath Westcombe into Eltham constituency although this has the disadvantage of breaking up Blackheath.

39. BEXLEY

- 39.1 We note that Mr Larkin and the Liberal Democrats use the Commission's proposed boundary i.e. the Greenwich/Bexley borough boundary as the main means of delineation between seats. Both these counter proposals use the overwhelming majority of the Bexley boundary for the construct of the seats. We believe this is correct as does Mr Whitehead who leaves the Commission's proposals intact.
- 39.2 There are many representations from Bexley agreeing with the Commission in broad principle. Most representations do however propose one particular ward swap which people believe will better bring communities together. The swap would involve Danson Park and North End wards. Cllr Bailey (Representation 010977) a

councillor for Danson Park and „a resident and a large part of my ward is in Welling... [this] would re-unite most of Welling... and maintain the majority of the town’s community links’. Cllr Taylor (Representation 018499) is amongst others who ask for the same change.

39.3 We oppose the Labour proposal which unnecessarily links part of Sidcup with part of Bromley borough. It should be also noted that the area of Sidcup included in Labour’s plan has only four of the five wards below the A2. It would therefore split a community and be contrary to Rule 5 (1) b and d.

39.4 We therefore support the constituencies of Bexleyheath and Sidcup, Erith and Eltham as proposed by the Commission except for the swap of wards identified above.

#### 40. BROMLEY

40.1 Not only is the Labour plan to link Bromley with parts of Bexley unpopular on the Bexley side of the boundary, it is also opposed in Bromley. Cllr Harry Stranger (Representation 018937) put the matter clearly in relation to the splitting of the Crays from the rest of Orpington.

40.2 We also note that the overwhelming majority of responses from within the borough of Bromley are in support of the Commission’s proposal to adhere to the Bromley borough boundary. The Commission’s proposal not only has support locally and of the Conservative Party but also the Liberal Democrats, Mr Larkin and Mr Whitehead. The Liberal Democrats state “We... endorse without hesitation the decision to restore the pattern of three seats wholly within the borough of

Bromley... We would strongly oppose any attempt to prevent this final modicum of alignment of local government and Parliamentary boundaries in south London.”

- 40.3 We strongly oppose the Labour proposal to link Bromley borough with both Lewisham and Bexley. This is unnecessary and disruptive to community ties including in Bexley. It would mean Bromley being divided between four seats rather than three and would therefore be worse under Rule 5 (1) b.
- 40.4 We therefore support the Commission’s proposal for Bromley in full i.e. the seats of Beckenham, Bromley and Chislehurst and Orpington.

## 41. CONCLUSION

41.1 We believe that the analysis of the alternative counter proposals do not justify any substantial reorganisation of constituencies as proposed by the Commission.

- a) the one exception to this arises from the necessary change to the proposed link of the City of London away from Islington and to the City of Westminster;
- b) the Labour proposal in north east London is unduly disruptive for a large number of boroughs;
- c) equally the Labour proposal in south east London is equally disruptive;
- d) the Liberal Democrat proposal for south west London disrupts several communities while trying to reunite a limited number of others.

41.2 We would therefore commend the Commission in its aim of trying to:

- a) retain existing seats but believe a further one, Hornchurch & Upminster can be added to the list;
- b) have regard for borough boundaries;
- c) not move unnecessary numbers of electors but believe the figure moved can be further reduced;
- d) keep communities together.

41.3 We believe also that:

- a) there need be no three authority seats in Greater London and we ensure that happens by linking the City of London with one borough – Westminster;
- b) there is no need to increase the number of orphan wards used across the region.

41.4 The Conservative Party proposals therefore make relatively minor changes to the Commission proposals except in respect of dealing with the many concerns in Hampstead and the City of London. We improve the proposals in respect of Rule 5 of the Rules for Redistribution of Seats – Schedule 2 to the Act in respect of the factors outlined in b, c and d of that Rule. We commend our proposals to the Commission which are in our final submission (Representation 025302).



APPENDIX: Compliance with Rule 5 – Greater London

a) Number of electors retained in their existing constituency

	Commission	Conservative	Labour	Liberal Democrats
Unmoved electors	3,639,377	<b>3,818,298</b>	3,526,984	3,665,681

b) Number of existing seats unchanged

	Commission	Conservative	Labour	Liberal Democrats
Unchanged seats	4	<b>5</b>	<b>0</b>	<b>5</b>

c) Number of orphan wards

	Commission	Conservative	Labour	Liberal Democrats
Orphan wards	<b>10</b>	<b>10</b>	11	<b>13</b>

d) Number of authorities a constituency comprises of

	Commission	Conservative	Labour	Liberal Democrats
One	30	<b>30</b>	25	29
Two	37	<b>38</b>	41	38
Three	1	<b>0</b>	2	1

**Bold** indicates the most compliant with Rule 5 of the four plans

**Red** indicates the least compliant with Rule 5 of the four plans