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Subject: Conservative Party response - second stage - Yorkshire and the Humber
Date: 03 April 2012 11:24:21
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To whom it may concern,

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

Yours sincerely,

_____ **Review Assistant**
Conservative Campaign Headquarters, 30 Millbank, London SW1P 4DP

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Conservative Campaign Headquarters
30 Millbank
London
SW1P 4DP

3rd April 2012

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

Dear Sirs,

Second consultation period – Yorkshire and the Humber Region

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

Yours sincerely,


Boundary Review Manager

YORKSHIRE AND THE HUMBER REGION

Submission of the Conservative Party regarding the responses to the initial proposals for the Yorkshire and the Humber Region

1. INTRODUCTION

- 1.1 We note that there are nearly 1,000 responses to the initial proposals for Yorkshire and the Humber Region. We further note that the vast majority of these are opposed to the initial proposals in one form or another.
- 1.2 We note that a number of representations oppose any change in North Yorkshire and the City of York and the two northern constituencies in East Yorkshire.
- 1.3 We note that a number of representations oppose the splitting of communities in particular we note this relates to splitting the Worth Valley from Keighley, the splitting of Bingley, the splitting of the Spenn Valley, the splitting of Batley, the splitting of Dewsbury, the splitting of Wakefield, the splitting of Holderness and the splitting of the Isle of Axholme.
- 1.4 We note there is some consensus in addressing these problems and a number of our proposals are supported by the Liberal Democrats and/or by individuals associated with the Labour Party albeit that the national Labour Party have not formally submitted any counter-proposals.
- 1.5 We will use as our guidance the factors outlined in Rule 5 of the Rules for Redistribution of seats – Schedule 2 of the Act.
- 1.6 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.

1.7 We will now comment in detail on the various areas and our views on any alternative proposals that have been suggested.

2. GENERAL COMMENTS ON COUNTER-PROPOSALS

- 2.1 We note there are a number of counter proposals which in most areas we will comment on as appropriate in the area concerned.
- 2.2 We note in the overview of the Liberal Democrat submission on page 1 they make two points on which we wish to comment.
- 2.3 Firstly they say they have not been constrained by the current county boundaries as they have taken more note of the former Ridings boundaries. We have to point out in the terms of Rule 5 (1) b that it is the current Local Authorities including County boundaries that the Boundary Commission may take into account and not the former Ridings boundaries which as they point out ceased for administrative purposes nearly forty years ago.
- 2.4 We also note they have actually attempted to find common ground with us and indeed we have with them and a number of our proposals are identical.
- 2.5 Although the Labour Party have not formally put in a counter proposal we will show where comments in their overall submission support our case and also where members of their Party specifically support our position as they do in a number of cases. We will also comment in more detail on the Shipley Labour Party comprehensive counter-proposal (Representation 023128) which like us makes no change in North Yorkshire and has an alternative proposal for West and South Yorkshire where more than half the constituencies have the same composition as we do.
- 2.6 We are flattered by the description of our counter-proposal by a Labour member from Bradford, who works for a Labour Member of Parliament, as “compelling”

(Mr. Howard; Day Two, Northallerton hearing, 9.55am, page 11). We do believe they provide a much better basis than the Commission's proposals for meeting Rule 5 of the Rules for Redistribution of Seats (Schedule 2 of the Act).

3. NORTH YORKSHIRE AND THE CITY OF YORK

- 3.1 We note considerable opposition to the proposed changes in North Yorkshire and considerable support to accept no changes in the eight constituencies covering North Yorkshire and the City of York.
- 3.2 We note the support for no change in North Yorkshire and the City of York comes not only from the Conservative Party but also from the one non-Conservative Member of Parliament covering these eight seats.
- 3.3 We welcome the evidence of Hugh Bayley, Labour Member of Parliament for York Central (Day Two, Northallerton hearing, 9.05am, pages 2-5 and Representation 005406) where he makes clear his opposition to the proposals and support for no change.
- 3.4 We note the large number of representations from District, Town and Parish Councils in support of no change (Representations 002690, 004762, 005376, 005385, 005392, 005440, 006263, 006427, 010263, 010942, 012184, 013563, 013567, 014480, 014671, 015342, 016344, 016937, 016982, 017128, 017768, 018871, 019583, 020048, 020060, 020067, 021146, 021147, 021165, 021290, 021993, 022613, 023105, 023723 and 024245).
- 3.5 We also note the evidence at the Northallerton hearing and the many written representations calling for no change. To sum up in the words of some of the representations “if it ain’t broke, don’t fix it”.
- 3.6 Although the Liberal Democrats would keep three further constituencies unchanged (the two City of York constituencies and Harrogate and Knaresborough) they make minor changes to the other four constituencies that the Commission change. They

also have four constituencies crossing from West Yorkshire to North Yorkshire as opposed to three from the Commission.

- 3.7 We note that although the national Labour Party have not made any counter-proposals they say in their final submission that “We believe that there are clear shortcomings in the Commission’s proposals to North Yorkshire, York and West Yorkshire” (Page 85).
- 3.8 In addition we note that Shipley Labour Party (Representation 023128) implicitly supports no change in North Yorkshire and the City of York as it has a complete counter-proposal for South and West Yorkshire on their own.
- 3.9 We also note that an individual who has made representations covering all of England proposes that North Yorkshire should remain completely unchanged and that South and West Yorkshire should be reviewed together for a total of thirty-three seats (Representation 019635).
- 3.10 We believe under all four of the factors that the Boundary Commission can take into account under Rule 5 (1) that our proposal is a vast improvement on the initial proposals.
- 3.11 Under Rule 5 (1) a, a number of representations show how accessibility is an issue in particular relating to the changes between Richmond and Skipton and Ripon.
- 3.12 Under Rule 5 (1) b, we much improve the position. No constituency consists of four local authorities unlike the proposed Malton constituency under the Commission’s proposals. The Skipton and Ripon constituency covers two local authorities rather than three under the proposals. Richmondshire local authority is contained within one constituency as opposed to two under the proposals. The City

of York is comprised of two rather than three and Selby comprised of one rather than three.

- 3.13 Under Rule 5 (1) c, as we make no change to all eight constituencies as opposed to one under the Commission's proposals and 83,743 electors who move under the Commission's proposals remain in the existing constituencies. This is clearly an improvement.
- 3.14 Under Rule 5 (1) d, as no constituencies change no local ties can be broken from existing constituencies as opposed to a number of local ties that are broken under the Commission's proposals as evidenced in the various representations.
- 3.15 We therefore believe we have made a compelling case for no change to North Yorkshire and the City of York and urge the Commission to change their initial proposals to our alternative position.

4. EAST RIDING OF YORKSHIRE, KINGSTON UPON HULL, NORTH AND
NORTH EAST LINCOLNSHIRE

- 4.1 We note considerable concern about the proposed changes in the former Humberside Area both in the written representation and from the evidence given at the Hearing in Hull.
- 4.2 We note that although the Labour Party do not propose any counter proposals for this area they do say they fully support the decision to allocate a whole number of seats to the area of former Humberside and that if there was a seat which contained parts of another county it would almost certainly worsen the level of equality (Page 82).
- 4.3 We particularly draw the attention of the Commission to the submission of Mr. Alan Wise (Representation 017059), an Axholme resident since 1959 who has a very similar proposal to us.
- 4.4 In respect of the existing constituencies of East Yorkshire and Beverley and Holderness we note there is considerable support for these two constituencies to remain unchanged.
- 4.5 We note this has the support of the final Liberal Democrat submission (Pages 8 and 12) and is supported by the two Members of Parliament (Greg Knight and Graham Stuart giving evidence at the Hull public hearing).
- 4.6 We note in particular the considerable concern in Hedon about the breaking of ties in Holderness and the Commission's proposal that South West Holderness should be one East Riding of Yorkshire ward included with Kingston upon Hull wards.

- 4.7 We note that a number of parishes in Holderness oppose any changes to the Beverley and Holderness constituency (Representations 004468, 004936, 021162, 022713 and 024235).
- 4.8 We believe there is an overwhelming case in terms of all the factors in Rule 5 to make no change to the constituencies of East Yorkshire and Beverley and Holderness.
- 4.9 We note that there is considerable concern within Holderness and the areas added to Hull to the west particularly South Hunsley.
- 4.10 Hull has to have at least one constituency which is partly in Hull and partly in the East Riding of Yorkshire.
- 4.11 The Commission and the Liberal Democrats have different solutions and we support the Liberal Democrats in respect that Holderness should not be included within a Hull constituency.
- 4.12 However both the Liberal Democrats and the Commission have two constituencies containing part of Hull and part of East Yorkshire.
- 4.13 We prefer our solution where just one constituency includes part of Hull and part of East Yorkshire. This is more compliant with Rule 5 (1) b.
- 4.14 The most obvious wards of the East Riding of Yorkshire to include are the five suburban wards on the western side of Hull and not South Hunsley and South West Holderness.
- 4.15 We note there is a lot of opposition to including the South Hunsley ward in a constituency with Hull wards (note point 2 in the representation from the Chairman of Elloughton-cum-Brough Town Council (Representation 000067)).

- 4.16 We note that David Davis MP who represents that ward, although he does not agree with our overall solution, makes it clear that this is the most anomalous ward to include with Hull (Representation 021927).
- 4.17 In respect of Hull although we have suggested an arrangement of Hull wards if an alternative was found which better met other concerns we would be content.
- 4.18 In particular we note that Diana Johnson the Labour Member of Parliament for Hull North has suggested that if you were to adopt our proposals a different configuration of wards would be better (Representation 019170). We would be perfectly happy to accept that alternative. Mr. Wise referred to earlier (Representation 017059) also has a slightly different configuration in Hull which we would be happy to accept.
- 4.19 We note that there is considerable concern that the Isle of Axholme is split between two constituencies.
- 4.20 We note this opposition comes from a number of Town and Parish Councils (Representations 013495, 020063, 021176, 021181, 022606 and 023040).
- 4.21 We also note the strong evidence of the Leader of North Lincolnshire Council, the Chief Executive of North Lincolnshire Council and Andrew Percy the Member of Parliament who covers the whole of the Isle of Axholme at the Hull public hearing.
- 4.22 We also note the evidence of the Labour Party in their final submission where they say the inclusion of the wards of Axholme Central and Axholme South in Scunthorpe breaks their ties with the town of Crowle in Axholme North ward. They say they also note that the wards are separated from Scunthorpe by the River Trent (Page 84).

- 4.23 We also note the submission of the Scunthorpe Charter Trustees (Representation 024239) who state that there are no community ties between the Isle of Axholme and Scunthorpe, and who suggest that Burton and Winterton has stronger ties with Scunthorpe which they suggest should be brought into the seat.
- 4.24 We think therefore there is an overwhelming case to keep the Isle of Axholme together which we manage to do.
- 4.25 We believe a better fit with Scunthorpe is the Barton upon Stather and Winterton ward for which we note there is some support including from the Scunthorpe Constituency Labour Party (Representation 024301).
- 4.26 We note some concern about the splitting of Cleethorpes between constituencies and the loss of the Cleethorpes name.
- 4.27 We appreciate we split Grimsby but believe the disadvantage of this is outweighed by the advantage of not splitting Cleethorpes or Axholme and retaining two constituencies unchanged.
- 4.28 We therefore commend to the Commission our alternative proposals, which we note are also proposed by two separate members of the public (Mr. Payne, (Representation 017877) and Mr. Thurston, an independent member of Hedon Town Council, who spoke at the public hearing in Hull (Day One, 2.35pm, Pages 32-33 and Representation 024311), for the East Riding of Yorkshire, Kingston upon Hull, North and North East Lincolnshire but would be perfectly content if either of the alternative configurations in Hull proposed by the Labour Member of Parliament Diana Johnson or Mr. Wise were adopted.

5. SOUTH YORKSHIRE

- 5.1 We note that although the Commission review South Yorkshire alone there are a number of suggestion that it is better to link South Yorkshire with West Yorkshire.
- 5.2 By doing this you can ensure only one cross-county seat between West and South Yorkshire as opposed to three cross-county constituencies between North and West Yorkshire.
- 5.3 You can also make very minimum change to the proposed constituencies in South Yorkshire which have generated very few representations.
- 5.4 We agree with the Commission that the three seats in Doncaster should remain unchanged. We note the Labour Party in their final submission accept this and say they believe it will gain widespread support (Page 85). We also note the support of Caroline Flint, Labour Member of Parliament for Don Valley (Representation 017152).
- 5.5 We note the Liberal Democrat submission changes all three Doncaster seats and we can see no justification for this when the seats do not need to change and are therefore most compliant with Rule 5 (1) c.
- 5.6 We also note the unchanged Rother Valley constituency and that this is welcomed by the Labour Party final submission.
- 5.7 Again we can see no justification for changing this seat as the Liberal Democrats propose.
- 5.8 There is general agreement with the proposals for all the constituencies containing Sheffield wards except Barnsley West and Ecclesfield.

- 5.9 We note the Liberal Democrats have suggested name changes to two of the constituencies and we would have no objection to these alternative names.
- 5.10 We note that the Labour Party and the Labour Member of Parliament for Wentworth and Dearne, John Healey, accept the proposed Rawmarsh constituency although Mr. Healey suggests a name change to which we would have no objection.
- 5.11 In respect of the three constituencies containing Barnsley wards we suggest slight alterations to provide a cross-border constituency with West Yorkshire.
- 5.12 Our proposals have the advantage of uniting Darton in one constituency. The Labour Party noted its division in its final submission. We also note that the Liberal Democrats and Shipley Labour Party unite Darton in one constituency.
- 5.13 We therefore recommend our changes in South Yorkshire which make minor changes to the Commission's original proposals and retain four constituencies unchanged.

6. WEST YORKSHIRE

- 6.1 We note that despite linking West and North Yorkshire a number of communities are badly split in West Yorkshire.
- 6.2 Amongst these are the split of Worth Valley from Keighley, the split of Batley, the split of the Spen Valley, the split of Dewsbury, the split of Wakefield, the split of Bingley and the split of Baildon and Shipley.
- 6.3 All these splits are referred to in a number of representations and our proposal of linking with South Yorkshire manages to unite them all.
- 6.4 We note in the final Labour submission that they cite numerous examples of ties that are broken with the division of towns and cities including Wakefield, Batley and Dewsbury (Page 86).
- 6.5 We note the considerable political consensus in respect of the Metropolitan Borough of Kirklees.
- 6.6 This includes all parties on the Council (Representation 005415), the Labour Member of Parliament for Batley and Spen (Day Two, Leeds hearing, 1.26pm, Pages 29-33), Shipley Labour Party and the Liberal Democrats.
- 6.7 There is general agreement about keeping the Dewsbury wards together, keeping the four Spen Valley wards together and keeping the two Batley wards together.
- 6.8 We note that the Liberal Democrats and Shipley Labour Party agree with the proposals for our Spen Valley constituency and with either our proposed or “alternative” proposed Dewsbury constituencies. There is general agreement regarding the Commission’s proposals for Huddersfield and Colne Valley and Skelmanthorpe although the name of the latter is opposed by a number of people

who wish to see Denby Dale added to the name rather than Skelmanthorpe which we agree with.

- 6.9 We note the widespread agreement for the two Calderdale constituencies of Calder Valley and Halifax to change to our proposals.
- 6.10 Our proposals are supported by the Liberal Democrats, Shipley Labour Party and Linda Riordan the Labour Member of Parliament for Halifax (Representation 023009).
- 6.11 We think there is therefore widespread support for Calder Valley to remain unchanged from the existing constituency and for Halifax to include the Bradford ward of Queensbury.
- 6.12 There is widespread opposition to the Worth Valley being excluded from the Keighley constituency (See Town and Parish Council Representations 001884, 016011 and 024433).
- 6.13 Our solution is to include Worth Valley in the Keighley constituency but to exclude Bingley.
- 6.14 We note this solution is shared by the Liberal Democrats and also by Haworth, Cross Roads and Stanbury Parish Council (Representation 024433) who make clear they are non-political.
- 6.15 We note the considerable concern in Shipley about the division of communities in the Shipley constituency. Particular concern has been expressed over the division of Bingley and the division of Baildon and Shipley.
- 6.16 It is these four wards that should be kept together in terms of community links. We note the evidence that the Baildon Parish is split between the Baildon ward and the

Shipley ward (Representation 012144). We note the Bradford District Green Party also express concern about splitting Baildon Parish Council (Representation 018856).

- 6.17 We also note the evidence of a Councillor for Bingley ward (Representation 013540) and the evidence of Councillor Cooke and Philip Davies MP speaking at the Leeds public hearing.
- 6.18 The Liberal Democrats keep the Bingley wards and Shipley together but they exclude Baildon whilst the Shipley Labour Party keep Baildon, Bingley and Shipley together, they exclude Bingley Rural. We commend our proposals which we believe best reflect the community ties in Shipley.
- 6.19 In respect of other constituencies totally within the Bradford Metropolitan Borough Area we have proposed a Bradford West constituency which ties a number of communities together. It is identical in composition to the Liberal Democrats proposal for Bradford Central and we would have no objection if the constituency was named Bradford Central.
- 6.20 In respect of Leeds we note the size of the wards means there has to be considerable change and a number of constituencies which have to be partly in Leeds and partly in another Unitary Authority.
- 6.21 We note that although there are relatively few representations from Leeds the vast majority oppose the proposals and the proposed Leeds North West and Nidderdale constituency is particularly unpopular.

- 6.22 We believe our alternatives are an improvement on the Commission's proposals. We have, like the Commission, retained three seats entirely within Leeds. With the size of the wards in Leeds it is difficult to have more.
- 6.23 As our seats link with neighbouring Metropolitan Districts they are more coherent than the proposed Leeds North West and Nidderdale.
- 6.24 Our proposed Otley seat has the same four Leeds wards as Shipley Labour Party but a different Bradford ward as otherwise it is not possible to keep Bingley and Shipley together.
- 6.25 We note that in respect of our proposed Leeds East and Leeds North constituencies we have in each case four of the same wards as do Shipley Labour Party in their Leeds North East and Leeds North West seats so we only differ by one ward in each.
- 6.26 Shipley Labour Party's Leeds East and Wetherby only differs in one ward from our proposed Elmet. We include Garforth and Swillington which is in the existing Elmet and Rothwell seat rather than Killingbeck and Seacroft which we feel fits better in a Leeds East seat. We note the evidence of the Member of Parliament for Elmet, Alec Shelbrooke, given at the Northallerton hearing (Day Two, 4.15pm, Pages 28-30).
- 6.27 Our Bradford East and Horsforth seat keeps together four Bradford wards which Jeanette Sunderland giving evidence at the Leeds hearing (Day Two, 2.54pm, Pages 44-46) made clear should be kept together. We feel these wards sit well together with two wards from the existing Pudsey constituency.

- 6.28 Our Pudsey constituency keeps together a number of wards from Leeds West and is a good fit with Tong. We note that Lewis Baston, who makes a counter-proposal for Yorkshire, proposes exactly the same combination of wards for this constituency (Representation 019522).
- 6.29 Our Batley and Morley seat keeps together the two communities that previously used to be together in a seat. We note that the four wards covering Batley and Morley are kept together in the Shipley Labour Party proposal. We add a different Leeds ward which the Commission link in their proposals with Morley and one Batley ward.
- 6.30 We propose two alternatives in South Leeds, either a Leeds South and Ossett constituency or a Leeds South and Outwood constituency as proposed by the Commission.
- 6.31 We believe the main drawback of the Shipley Labour Party proposal is their very awkwardly shaped Leeds Central and Normanton constituency which splits Outwood with very little community of interest throughout the seat.
- 6.32 In respect of our proposed Leeds South East and Castleford seat we note that this has the same composition as Shipley Labour Party in Wakefield, with just one different ward in Leeds.
- 6.33 Our Pontefract and Normanton seat is the same proposal as Shipley Labour Party except that we include Normanton and they include Hemsworth.
- 6.34 Pontefract is currently in a seat with Normanton and we believe this is the best solution.

- 6.35 Like Shipley Labour Party we keep all four Wakefield wards – East, North, South and West – in the same constituency. The Commission split these four wards between three different constituencies which we believe is a severe drawback of the Commission’s proposals.
- 6.36 We believe our proposals for West and South Yorkshire are an improvement on the Commission’s proposals.
- 6.37 In terms of Rule 5 (1) c we move 40,071 fewer electors from their existing constituency.
- 6.38 The biggest advantage is in respect of Rule 5 (1) d where we restore local ties in Batley, Wakefield, Dewsbury, Shipley, Bingley, Spen Valley and Worth Valley.
- 6.39 Although our proposal may break some local ties none of these are as significant as those which the Commission break and which we restore.

7. CONCLUSION

- 7.1 We believe there is a very strong case for considerable change to the initial proposals for Yorkshire and the Humber Region.
- 7.2 We believe this is borne out by the vast majority of representations which disagree with the initial proposals and think they are too disruptive.
- 7.3 We have sought consensus wherever possible and note that a number of our proposals are identical to those of the Liberal Democrats and Shipley Labour Party. We also have support from a number of individual Labour Members of Parliament and local Labour Parties.
- 7.4 Although it is not possible to achieve complete consensus we believe our proposals to be the ones that would have the greatest amount of support with many seats acceptable to one or both of the other parties.
- 7.5 We also believe we best meet the factors that may be taken into account in Rule 5 (1) of the Rules for Redistribution of Seats – Schedule 2 to the Act.
- 7.6 Our proposals are more compliant with Rule 5 (1) a because of the better accessibility in North Yorkshire.
- 7.7 Our proposals are an improvement in terms of local government links both in terms of how many local authorities a constituency consists of and in terms of how many constituencies are contained within a local authority. The Liberal Democrat alternative is particularly deficient on this point and our proposals are more compliant with Rule 5 (1) b.
- 7.8 Our proposals are the least disruptive of any proposals and have fifteen unchanged constituencies being most compliant with Rule 5 (1) c.

- 7.9 Our proposals address many local ties that are broken as evidenced in many submissions including those of the Labour Party and the Liberal Democrats. Our proposals therefore are a considerable improvement over the Commission's proposals in terms of Rule 5 (1) d.
- 7.10 There are a number of counter-proposals a number of which we have referred to in our submission. One of our Association Chairmen in Leeds, Robert Winfield, has prepared a detailed analysis of these counter-proposals, which he has submitted to the Commission as part of the second consultation stage. We commend Robert Winfield's submission to you as a very detailed critique of various alternative proposals.
- 7.11 We commend our counter-proposal as outlined in our final submission (Representation 025308) to the Commission and urge their adoption as the revised proposals for Yorkshire and the Humber.