

From: [BCE Reviews](#)
To: [BCE NorthEast](#); [BCE WestMidlands](#)
Subject: FW: Official Liberal Democrat submissions for the second consultation
Date: 18 April 2012 16:55:30
Attachments: [Lib Dems - 2nd consultation - east mids.pdf](#)
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From: Tom Smithard [mailto: [REDACTED]]
Sent: 03 April 2012 11:12
To: BCE Reviews
Cc: James Simon - Boundary Commission for England; Hartley Sam - Boundary Commission for England
Subject: Official Liberal Democrat submissions for the second consultation

Simon, Sam

Please find attached submissions for the second period of consultation from the Liberal Democrats. Again, we have produced one submission per region.

If you could confirm these have been received I would appreciate that.

All the best

[REDACTED]

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Submission to the Boundary Commission for England second period of consultation: **West Midlands**

NB numbering refers to paragraphs in our opponents' submissions

1) COMMENTS ON THE LABOUR PARTY SUBMISSION

9 b) The Labour party recommends that the Region should have only two sub-regions – one for Staffordshire and Stoke-on-Trent, and one for the rest of the West Midlands. There seems to be an assumption that there have to be sub-regions, although these are purely a creation of the BCE, and have no statutory authority whatsoever. It is only a small step to remove this restriction altogether, rather than treating the north of the Region differently.

9 c) We do not agree with all the seats supported by the Labour party, and these will be addressed later in the comments.

9 d) We support the retention of the Cannock Chase and Burton constituencies, but think it would be more appropriate to re-name the latter as East Staffordshire. We do not support the BCE's Tamworth constituency, as we believe a better solution – supported by the ***Tamworth Herald*** – would be to include 4 wards from North Warwickshire which lie to the east of the town, and return 4 of the 7 'borrowed' wards on the west side to Lichfield.

We accept the Labour Party objection to combining Newcastle-under-Lyme with Stone, but not the alternative put forward to carve up Staffordshire Moorlands instead. We believe that the counter-proposal from a resident of Trentham, presented at the Stafford hearing, offers a better solution, by keeping the Stone constituency separate. By adding 4 wards from the south of Stoke-on-Trent, and 4 wards from the south of Newcastle-under-Lyme (including 2 presently in the Stone constituency) it leaves Staffordshire Moorlands intact. Stone would also keep the 6 Stafford Borough wards listed in the BCE initial proposal. Creating Stoke-on-Trent North and South seats totally within the borough, avoids the split of Burslem, and allows all the northern wards in the borough of Newcastle-under-Lyme to become part of a single constituency.

We agree that the Church Eaton, and Eccleshall wards should be transferred to Stafford, but not Gnosall & Woodseaves, which would be replaced with the Haywood & Hixon ward from Lichfield, keeping the Lichfield constituency within 2 local authorities instead of 3.

9 e) We support the unchanged North Shropshire constituency, but not Shrewsbury, which we believe should become a Shrewsbury & West Shropshire constituency, adding 3 of the electoral divisions along the Welsh border in exchange for transferring one division on the eastern side to a different Bridgnorth & Wellington constituency to the Labour one.

We strongly support the view that Telford should remain as one constituency, with the addition of Hadley & Leegomery, and Donnington from the present Wrekin constituency. However, we do not accept the topping up of the rest of The Wrekin with more divisions from Shropshire, which creates a doughnut round Telford lacking any real community ties.

9 f) The Labour party seems happy to accept the major disruption to Herefordshire by the BCE proposals, and claims that the Ludlow & Leominster and Malvern & Ledbury constituencies “have strong internal communications despite their large and sparsely populated areas.” This is a nonsense, and it is obvious that the London Labour party has never visited this area, where one rural constituency stretches 75 miles from end to end, and the other crosses two counties and three local authority areas and the River Severn.

9 g) Again, the Labour party says that it accepts extensive disruption to Worcestershire, caused by the BCE proposals in the county. Yet this is unnecessary, and shows Labour’s ignorance of the Shires, compared to their great interest in the urban areas of the Region. Although the Labour party accepts the need to increase the electorate of Redditch, it just agrees with the splitting of the Bromsgrove constituency, which was within the UK quota, and the compensation of adding on Droitwich from another local authority – Wychavon.

Since Labour did not accept the two BCE sub-regions in the south of the Region, there was no barrier to crossing the county boundary of Warwickshire and Worcestershire in preference to that of Herefordshire and Worcestershire. Yet it seems that they did not consider the possibility of increasing the electorate of Redditch with the north-western wards of Stratford-on-Avon, some of which, like Studley, are almost part of Redditch. Retaining the Mid and West Worcestershire constituencies would have been preferable.

9 h) We agree with the Labour party contention that “it is appropriate to create a constituency comprising part of the Borough of Solihull with part of the county of Warwickshire” but not the alternative counter-proposal they put forward. We share the belief that “the precise configurations which the Commission have adopted are unnecessarily disruptive of existing constituencies” and have proposed better solutions.

9 i) We agree with a North Warwickshire constituency that has 3 northern wards from the Borough of Solihull, so that the new Nuneaton constituency benefits from being totally within the borough of Nuneaton & Bedworth rather than borrowing wards from Rugby.

Rugby constituency would then keep **all** its wards as well as the Bulkington ward (already in the constituency from Nuneaton & Bedworth), better complying with Rule 5 than that of the Labour party which shares out wards in all directions, with Stratford-on-Avon district in 4 different constituencies, similar to the BCE Initial Proposals.

We support a Kenilworth & Meriden constituency in place of the Kenilworth & Dorridge, but with Bickenhill ward included as part of the ‘Meriden Gap’ and not Ryton-on-Dunsmore, which should be returned to Rugby CC from the disbanded Kenilworth & Southam seat.

9 ii) We support the retention of the three Coventry seats unchanged, and agree that the Solihull constituency should not be changed from its present configuration. However, we believe that the Labour party counter-proposals for the surrounding area are inappropriate.

We do not support a Chelmsley Wood & Stechford constituency, which would take one ward from the Hodge Hill constituency and one from Yardley. This would split Yardley and leave a small border between Sheldon and South Yardley. Adding Bordesley Green (which should remain paired with Washwood Heath) does not balance the transfer of Stechford & Yardley North, or any break-up of the Birmingham City boundary on the east side.

This is not necessary in order to allow the 4 Sutton Coldfield wards to remain unchanged. The Labour party also proposes exporting the Birmingham wards of Handsworth (splitting this off from East Handsworth) and Soho into a revised Smethwick & Handsworth seat,

leaving Perry Barr with a 'hole' on its west side to accommodate Kingstanding from their modified Erdington with Hodge Hill and Castle Bromwich. This is really unacceptable.

We do not agree with the Labour counter-proposals for Walsall, or the proposed Walsall South & Bilston constituency, including wards from four different local authorities. We do not support the resulting Wolverhampton North and South seats, believing a better split is to create a Wolverhampton West and East with the inclusion of the Spring Vale ward.

We do not support Labour's rearrangement of wards in the Dudley and Sandwell areas, and have proposed alternatives which we believe better respect existing constituencies in the West Midlands conurbation. We have added wards from South Staffordshire on the west side of Dudley, to avoid distortions caused by matching up various ward sizes, and achieving benefits in a number of adjacent constituencies by altering one constituency. South Staffordshire has no major centre, and its scattered communities have better links with adjacent urban areas. The BCE propose that Penkridge stays as part of the Stafford constituency, and we propose that an East Shropshire and West Staffordshire is created from the east of The Wrekin and just over half of the South Staffordshire constituency.

2) COMMENTS ON THE CONSERVATIVE PARTY SUBMISSION

1.3 & 1.4 We do not agree that dividing the Region into sub-regions ensures that Rule 5 (1) b & c is better met than by utilising an holistic approach to the Region; or believe that the Commission's division of sub-regions represents the least disruptive solution for the 54 new constituencies in the West Midlands.

1.6, 1.7 & 1.8 We do not accept that Worcestershire should be linked with Herefordshire, when it would be more appropriate to link the east side of Worcestershire with Warwickshire. The Conservatives have just accepted the BCE sub-regions based on the total number of electors within each, without any consideration of the distribution of those electors across the chosen sub-regions. This neglect has resulted in some strange combinations, which do **not** respect Rule 5.

1.9 Having accepted the BCE sub-regions without question, the Conservative proposals are therefore based on these non-statutory strictures, and do not consider any alternatives which better address the requirements of Rule 5, which they claim to better represent.

2.1 & 2.2 We do not accept the Conservative claim that there was a need to increase the electorate of the existing Bromsgrove constituency. It already has 73,279 electors, 470 above the minimum requirement. Taking Droitwich out of Wychavon District Council does not respect its local authority boundary, or the existing constituency of Mid Worcestershire, totally contained within that district.

2.4 The London-based Conservative party clearly has no knowledge of the strong local support for a single Telford constituency. The BCE proposals split the communities of the largest town in Shropshire into a north and south Telford by claiming the M54 motorway as a 'natural boundary' and the doubtful benefits of combining urban and rural areas. It is also falsely claimed that "It is impossible to create a constituency just from Telford." In fact the **urban** area of Telford town has 78,142 electors and is well within the statutory tolerance.

2.6 We agree that the BCE has given no thought to the fact that Alveley and Claverley division is to the ENE of the River Severn with no road crossing of the river within it, and therefore accessibility has been disregarded in the Ludlow & Leominster constituency.

2.7 We agree with returning the Golden Valley wards into South Herefordshire where they belong, but the existing constituency name should be retained. But we do not agree that the modified Ludlow and Leominster constituency is “appropriate”, because of the unacceptable knock-on effects in the adjacent Malvern & Ledbury constituency.

2.8 We do not accept this constituency which crosses 3 district boundaries when it was totally unnecessary to do so. It is no solution to upset the unchanged constituencies of Wyre Forest and Worcester by ‘tacking on’ the three wards to the east of the River Severn in exchange for a few more wards south of Malvern.

2.9 The Conservatives claim that important local ties in Malvern have been broken by the BCE proposal, and that the transfer of Morton & Wells wards will solve this anomaly. However, leaving West Worcestershire almost as it is now, does not break any local ties, as the *whole* of the Malvern Hills District would be in the one constituency, and is far more respectful of Rule 5 than the tinkering round the edges which the Conservatives propose.

2.11 We do not accept an Evesham or South Worcestershire seat, when the existing constituencies of West and Mid Worcestershire are totally contained within the district boundaries of Malvern Hills and Wychavon, respecting local authority boundaries and the local ties within the present constituencies. The alternatives all fly in the face of Rule 5.

2.13 We do not accept that the “county boundaries are crossed in the correct places” and believe it was a serious mistake to cross from Herefordshire into Worcestershire, when the shortfall in Redditch could be solved with the surplus wards from Stratford-on-Avon in Warwickshire. This would keep 6 of the constituencies in Herefordshire and Worcestershire virtually the same; with North Herefordshire gaining 4 electoral divisions from Ludlow to become Ludlow & North Herefordshire; and Redditch gaining 5 wards from Stratford, ensuring Stratford wards were in just two constituencies instead of the BCE’s 4.

3.1 We support eleven constituencies, but not totally within the Stafford County area.

3.2 We support the Staffordshire Moorlands seat which is coterminous with the local authority, but do not agree with the splitting of Newcastle-under-Lyme into two seats.

3.3 We do not support the Kidsgrove & Tunstall seat which splits Burslem, but believe all of Kidsgrove should be recombined into a Newcastle-under-Lyme constituency.

3.4 Linking Newcastle with Stone is considered unacceptable by people in both, and is not the “correct option”. Creating two Stoke-on-Trent seats, North and South, would keep Tunstall & Burslem together in the North; and Hanley, Stoke, Fenton & Longton together in the South – the 6 towns in the ‘federation’. Stone would remain a constituency in its own right, with wards from the southern extremity of Stoke, instead of Staffordshire Moorlands.

3.5 We agree with the retention of Cannock Chase and Burton (although we prefer the name of the latter to become East Staffordshire). We do not support the retention of South Staffordshire, which has less cohesion than many other existing constituencies, because of the benefits its wards can provide to the electorates of its adjacent constituencies. But

we do support the larger part of the constituency being combined with East Shropshire, (the east of the existing Wrekin constituency) including Newport, Shifnal and Albrighton.

3.6 We do not agree with the revised Lichfield seat being in three local authorities. It already has three wards from East Staffordshire District, which was too large for a single constituency, and it was a mistake to add the Haywood & Hixon ward from Stafford. The BCE proposal is the result of too rigid adherence to self-imposed sub-regions, which did not allow any crossover between Staffordshire and adjacent areas. Removing these non-statutory barriers allows a better solution for Lichfield and Tamworth (supported locally).

3.7 We do not accept that the BCE proposals are a “logical creation” because it is not logical to impose artificial restrictions to the achievement of results which better respect Rule 5. A slavish acceptance of the BCE’s Initial Proposals excludes better solutions.

3.8 to 3.11 We cannot agree with the overall conclusions in this section. In particular, it is clear that the BCE proposal to split Newcastle-under-Lyme and combine it with Stone has generated major objections in the area. The suggestion from local opponents to split Staffordshire Moorlands is not accepted. The **logical** solution is to transfer wards from the **south** of Stoke-on-Trent to Stone, rather than combining northern wards with Kidsgrove.

4.1 We agree with the allocation of 31 constituencies in this part of the Region, but not constrained by the boundaries of a rigid sub-region.

4.6 We support the decision to keep the three Coventry constituencies unchanged.

4.7 We agree with the principle, but not the proposed Conservative implementation.

4.8 We agree that Water Orton, and Coleshill North & South should be returned to North Warwickshire, but do not agree with the Conservative alternative solution which, like the BCE proposal, causes major disruption across local authority boundaries to the south.

4.10 We do not accept that Avon & Swift ward on the outskirts of Rugby has better links with Nuneaton, and believe **all** the Rugby wards should be in the Rugby constituency, and not transferred to Nuneaton for the benefit of North Warwickshire alone.

4.11 We do not accept the changes proposed in this section. It is not consistent to move wards across district boundaries in some cases but not in others. County boundaries are no more important than district or borough boundaries in the BCE Guide to the Review.

4.12 We agree that Knowle should be part of a Meriden constituency with Kenilworth, but not the proposed Kenilworth and Dorridge constituency which includes parts of three local authorities instead of two, and splits part of the green belt area in the ‘Meriden Gap’.

4.15 The reduction of Birmingham seats from ten to nine is not accepted as justification for ‘inevitable disruption’. Ten seats can be accommodated without exporting city wards.

4.16 In general, splitting wards is not a good idea. In Birmingham there are exceptional and compelling reasons for considering this possibility, and splitting only three wards out of 40, would allow all the existing ten constituencies to be retained, minimising disruption.

4.18 to 4.22 We do not accept the unnecessary disruption to the Sutton Coldfield and Erdington constituencies. Even without splitting wards, it is still possible to achieve a better configuration for Birmingham constituencies without exporting four wards from the city.

4.23 This is not a logical proposal. Acocks Green is north of Hall Green which is north of Billesley, so it does not make sense to rearrange the wards in this area, as proposed here. Solihull should remain as it is now, without splitting the town of Shirley. This keeps the city boundary intact on the east side, and this allows Birmingham Yardley to remain the same.

4.25 & 4.26 We support the retention of the Stourbridge, and Halesowen & Rowley Regis constituencies with minimum change, with Kinver joining the Stourbridge constituency.

4.27 & 4.28 We support Dudley South and Dudley North constituencies rather than Dudley East and Dudley West, with the addition of wards from South Staffordshire to bring them within quota.

4.30 We believe that Birmingham wards should not be exported, and Sandwell should have 2 constituencies totally within its borough, and one (Halesowen & Rowley Regis) shared with Dudley as at present. Instead of a Smethwick and Wednesbury (or preferably West Bromwich) seat, it would be possible to create Sandwell East and West seats, which use the Sandwell name in the title, as requested by the borough, like neighbouring Dudley.

4.31 & 4.32 We support the counter-proposal that Wolverhampton should have a West and East constituency, rather than a North and South. The only difference we propose in the configuration of Wolverhampton West is the addition of the 3 Perton wards from South Staffordshire in place of the Penn Ward. This would join Lower Penn & Wombourne in our proposed Dudley North (& Penn) constituency. In Wolverhampton East, Spring Vale has links with Bilston, and should replace Darlaston South, which is in the Walsall borough.

4.33 The Conservative proposal now supports the addition of Wednesfield North & South to the Walsall West constituency, which seems to have general support from all parties. However, we believe that the two Darlaston wards should remain together in Walsall West, with Wednesbury North from Sandwell, which has community links with Darlaston. Birchills Leamore should be part of Walsall North, and Pleck part of Walsall South, due to its links with the Palfrey and St Matthew's wards.

4.34 We accept the new Walsall North and Walsall South named constituencies with a few changes. First, Birchills Leamore should be back in Walsall North along with Bloxwich and Blakenhall; and Oscott should remain in a Birmingham constituency. To compensate for this, Aldridge Central & South would move from Walsall North to South, and Pleck from Walsall West to Walsall South. Constituencies with three names are not accepted by BCE.

5.1 We do not believe that the Conservative counter-proposals represent the best solution for the West Midlands. An holistic approach to the Region avoids the distortions that are made necessary by the imposition of non-statutory sub-regions, and we hope that our comments will be given due consideration by the Commission.

5.6 We support the proposed changes in this section, but recognise other areas where anomalies could have been resolved, particularly in the case of the 10 Birmingham seats.

Footnote:

Work on the Liberal Democrat proposals started in the autumn of 2010, and consultations were held across the West Midlands to ascertain views on possible configurations for the proposed 54 constituencies in the Region. As soon as the UK average of 76,641 electors was announced, detailed proposals were developed and circulated for discussion. It is not clear how much consultation was undertaken by other parties to determine local opinions, but we believe that the Liberal Democrat submissions better reflect Rule 5 of Schedule 2.

3) COMMENTS ON ALL SUBMISSIONS FROM 4 PROPOSED CONSTITUENCIES

a) Solihull BC

90% of the submissions in respect of Solihull requested that the constituency should remain unchanged. There were strong arguments against splitting the town of Shirley and adding in the Birmingham ward of Sheldon. With an electorate of 77,354 there was no need to alter this constituency, and these views corresponded with the majority of the submissions from adjacent constituencies. We trust that these views will be respected.

There were suggestions that it was more logical to include Bickenhill and Meriden with the Kenilworth constituency to compensate for Shirley South and West staying in Solihull. This would keep Knowle in with the other two rural wards with which it has more affinity.

b) Birmingham Yardley

Out of 76 submissions from this constituency, 73% were in favour of no change to the existing constituency. In particular, there was strong aversion to substituting Bordesley Green for Sheldon. There were strong arguments for keeping the River Cole as the local boundary, which it had been for 1,000 years, and noted the different demographics between the two. It was felt that Bordesley Green and Washwood Heath 'belonged together' and it would be a mistake to split them on the grounds of electoral numbers.

A few people in Sheldon liked the idea of being part of Solihull, but did not comment on the knock-on effects in other areas, like splitting Shirley, and the existing community links in Yardley by so doing. We believe that there are satisfactory alternatives which do not break up the boundary of Birmingham City on the east side, and hope that the Boundary Commission will take due note of the majority views expressed. There were also objections to alternatives which split Yardley by removing Stechford and Yardley out of the constituency instead of Sheldon.

c) North Warwickshire

Over 100 submissions argued strongly that Water Orton and Coleshill should remain in North Warwickshire, and not become part of Meriden, and a lesser number suggested that Weddington be returned to Nuneaton to compensate. Some of the views were related to the high-speed rail link through the area, which is supported by the MP for Meriden and not by the MP for North Warwickshire.

Coleshill Town Council proposed changes to 6 other constituencies as an alternative that would keep Water Orton & Coleshill in the existing North Warwickshire constituency. If North Warwickshire was the only constituency affected, then it might be sensible to look at it in isolation, and add the borough of North Warwickshire (with only 49,627 electors) to

Bedworth, which is part of the separate Nuneaton & Bedworth borough. However, this stops Nuneaton from being a constituency within its own local authority area, and results in Nuneaton having to 'borrow' wards from Rugby; and Rugby having to 'borrow' wards from Stratford-on-Avon. Rugby should also be a constituency within its existing district, and only need one ward from Nuneaton (Bulkington) which is already in the constituency. This would better respect Rule 5 and avoid problems with the BCE proposals in this area.

We support the view that Water Orton and Coleshill should remain in North Warwickshire, but have suggested that 3 northern wards from Solihull should be added, rather than the other way round. We also propose that 3 of the Bedworth wards are returned to Nuneaton to create a compact constituency totally within its borough. Also that the 4 northern wards of Dordon, Polesworth E&W, and Newton Regis & Warton should be part of the Tamworth constituency. This would not move them into Staffordshire from North Warwickshire; their services would still be provided by Warwickshire, despite fears expressed to the contrary.

d) South Staffordshire

There were 40 submissions from South Staffordshire, all wanting the existing constituency to remain, as proposed by the BCE, despite the bizarre solutions that the Commission had had to propose in the surrounding areas of Shropshire and the West Midlands. It was clear from these submissions, that they thought the Lib Dem proposals would physically move them into a different local authority, that they would lose their District Council and local services, and that their Council Tax would be decided by the urban authorities with which they might be associated.

The misinformation was consistent, with the same responses coming from a number of intelligent and educated sources, complaining that they would cease to be part of the county of Staffordshire. Many admitted that the present constituency was a collection of 27 individual communities, but none provided the evidence of community links between, say, Kinver in the south, and the ex-mining community of Huntington & Hatherton in the north.

The BCE made it clear in its Guide to the 2013 Review (para 32) that "this does not mean that an existing constituency should be automatically considered to be 'protected from change', simply on the basis of its electorate figure already falling within the statutory range." With a 2011 electorate of 74,189, South Staffordshire meets the new quota, but unlike many other constituencies has no major or natural centre. The benefits to adjacent constituencies by the redistribution of some of its wards should be seriously considered.