

#### BCE/2018/1st meeting

#### **BOUNDARY COMMISSION FOR ENGLAND**

#### Notice of meeting

A meeting will be held at 35 Great Smith Street, London on Thursday 22 February 2018, at 14.00.

#### Agenda

- 1. Welcome (AN)
- 2. Programme update (14.05) **Paper 1** (TBe)
- 3. Evaluation of communications strategy in revised proposals consultation period (14.20) **Paper 2** (SH)
- 4. General Data Protection Regulations and information management review (14.45) **Paper 3** (TBe)
- 5. Arrangements for closing stages of 2018 Review (15.15) **Paper 4** (TBe)
- Regional summaries of revised proposals consultation responses (16.00) Paper 5 (TBo)

Close (17.00)

Sam Hartley Secretary to the Commission

15 February 2018

#### 2018 Review Programme Update

1. Programme documentation will be provided to Commissioners for all scheduled Commission meetings, and will also be sent to them at regular intervals in between. The standard suite of documentation will be as set out in this paper.

#### Update since the last meeting

2. Commissioners last met formally to consider general business on 4 May 2017 (with specific meetings in July to agree your substantive revised proposals). The operational highlight since that meeting has been publication of the revised proposals for constituencies on 17 October 2017, followed by eight weeks statutory public consultation, supported by our consultation website and significant publicity work (see separate paper for analysis of publicity activity). Final count of responses to the revised proposals consultation was 10,729.

#### Timetable (Project plan)

- 3. The timetable for the remainder of the 2018 Review is set out at **Annex A** in the form of a project plan. The project plan is a 'living document', which is expected to reflect changes in the timetable as they are required. Dates and the description of activities will therefore generally be more broad the further away they are in time, becoming more specific and detailed as they come closer.
- 4. Commissioners at their meeting of 25 April 2016 approved the 'baseline' plan for the review. Annex A is the most recent update to that baseline. We are pleased to report that progress of the review to date has been on track with that anticipated in the baseline plan. New information in this updated version therefore lies in the added detail of target dates inserted for the final stages of the review, i.e. steps of development of the final recommendations, and production and submission to Government of your final report on the 2018 Review.
- 5. A separate paper for this meeting considers in more detail the arrangements for concluding the 2018 Review and submission of the final report.

#### **Risk register**

- 6. Good management of the review involves use of a specific risk register to expressly identify and track both the key risks to the success of the project, and the mitigating actions taken to keep those risks within acceptable levels.
- 7. The risk register for the 2018 Review is at Annex B. Whilst this remains pitched at a strategic level appropriate for Commissioners' consideration, we have sought to add some additional detail to ensure the document is sufficiently comprehensive for Commissioners to have a good understanding of the nature of the main risks the review faces, mitigation action taken, the current severity of each, the trend (i.e. getting better or worse), and what level of risk is considered acceptable for each. As with the project plan, the risk register is also maintained as a 'living document', with new risks added as they may arise, and ongoing risks modified as they decrease/increase.
- 8. The most significant current risk to successful delivery of the 2018 Review (albeit one which we have no realistic ability to influence) is that the Private Member's Bill from Afzal

Khan MP is passed, the effect of which would be to terminate the current review, and restart afresh (using amended rules).

#### **Highlight report**

9. The Highlight report at **Annex C** is the key 'one-pager' summary document where Commissioners can see at a glance all the most recent developments in relation to the project, whether that be new activities, changes to significant risks, and/or shifts in the projected delivery dates for certain activities or milestones.

#### Frequency

10. In addition to issuing all three documents for scheduled Commission meetings, as agreed at the previous meeting, the project plan and risk register are issued to Commissioners on a quarterly basis, and the highlight report issued monthly. Any matters of a particularly notable or pressing nature are, of course, raised with Commissioners directly outside of this regular information stream, via the Secretary or other member of the senior staff.

	2018 Review Projec	l Pla	11								
		2017					2018				
		Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Review work											
	Collate data, check and publish figures (24 Feb)										
	Teams develop outline schemes										
	Teams review outline schemes with senior management										
	Teams refine schemes and draft initial proposals paper										
	Walk Commissioners through initial proposals (w/c 13 June)										
	Finalise initial proposals and prepare for publication										
	Publication and 12-week consultation 13 Sept - 5 Dec										
	Prepare responses for publication										
	Publish responses and four-week consultation 28 Feb - 27 Mar										
	All responses entered into consultation portal by 7 April										
	Review teams brief SLT 18 Apr-12 May										
	Review teams brief ACs (inc determining site visits) 2-26 May										
	Lead AC meeting with SLT w/c 5 June										
	Review team and AC site visits 8-30 June										
	Commission meetings to agree revised proposals w/c 10, 11, 17 & 18 July										
	Revised proposals reports to Commission by 28 July for clearance with DE and NP 31/7 & 1/8										
	Reports text cleared and to printer by 11 August for typeset and print										
	Hard copy reports in office by 18 Sept for dispatch preparation										
	Publish revised proposals then eight-week consultation 17 Oct - 11 Dec	х									
	Analysis of responses to revised proposals	Х	Х	Х							
	Region teams work with lead Commissioner to develop recommendations - meetings 22 February, and 1,5,6,26-29 March			х	х						

	2018 Review Project										
		2017					2018				
	Full Commission decisions on final recommendations -	Dec	Jan	Feb	Mar	Apr		Jun	Jul	Aug	Sep
	meetings 19 April, and 8,10,14,17 May					Х	Х				
	Write up final report including preparing maps						X	Х	Х		
	Proofing and print typesetting of report								Х	Х	
	Submit final report to Government										Х
Staff & Recruitment											
	Business Board approve Review staff										
	Recruit Review staff										
	Business Board approve Corporate staff										
	Recruit Corporate staff										
	AC recruitment - advertisement										
	AC recruitment - sift and interviews										
	AC recruitment - Commission recommendations and submission to Minister										
	AC recruitment - Appointments made (to commence 1 August)										
	Recruit casuals for public hearings and beyond										
Accommodatio n, IT & Public Hearings											
	Final user acceptance testing and handover of GIS										
	Load finalised PD shapes into GIS										
	Consultation portal 'Discovery' phase										
	Consultation portal 'Alpha' phase										
	Consultation portal 'Beta' phase										
	Final handover and 'Go live' of consultation portal										
	Accommodation move to full-size premises										
	Investigate and book public hearing venues										
	Procure transcription service for public hearings										

	2018 Review Proje	ct Pla	In								
		2017					2018				
		Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
	Run public hearings										
	Website hosting transition to GDS										
Comms											
	Note to EROs about local boundary changes, PD mapping, and register output										
	Agree policies with Commission										
	Pre-launch meeting(s) with political parties										
	Agree and publish UK figures with other PBCs										
	Prepare 'Guide to 2018 Review'										
	Publish 'Guide to 2018 Review'										
	Consult on initial proposals (statutory) 13/9 - 5/12 (PH 11/10 - 21/11)										
	Secondary consultation (statutory) 28/2 - 27/3										
	Consult on revised proposals (statutory) 10/10 - 4/12	Х									
	Statutory annual progress update		Х								
	Publish Annual Report							Х			
	Publish final report and recommendations (Sept 2018)										X
Finance											
	Spending Review 2015 negotiations										
	Build budget for coming financial year		Х	Х	Х						
	Finalise figures for previous financial year					Х	Х				

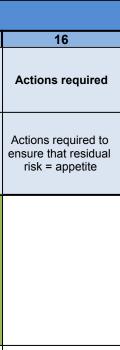
				Strateg	gic Risł	Regis	ter: 20 <sup>-</sup>	18 Review of Parli	amenta	ary Con	stituen	cies			
1	2	3	4	5,6,7	- Inherent	Risk	8	9	10	11,12,	13 - Residu	al Risk	14	15	Γ
Risk ID	Title	Description / Indicators	Owner	Impact	Likelihood	Severity level	Response	Controls	Mitigation status	Impact	Likelihood	Severity level	Risk trend and status	Appetite	
	Broad title	Description of risk and / or indicators	CLT member	Severe; significant; moderate; minor; insignificant	Negligible; remote; possible; likely; almost certain	Red; amber; green	Transfer; tolerate; treat; terminate	Internal controls	Red; amber; green.	Severe; significant; moderate; minor; insignificant	Negligible; remote; possible; likely; almost certain	Red; amber; green	Trend: Reducing; increasing; static; new	Red; amber; green	e
1	Legal challenge to BCE	A legal challenge to the review policies or procedures delays the delivery timetable and/or demands additional staff / financial resource to address	SH	Significant	Possible	12	Treat	1. Review of all internal policies and procedures; 2. production of Guide clearly outlining policies, practices and legal obligations or interpretations; 3. Equality Analysis conducted; 4. legal advice sought when appropriate (e.g. GDPR implementation); 5. Commission meetings and associated communications with qualifying political parties; 6. regular quality assurance of internal procedures		Significant	Remote	8		8	
2	Legislative change	Changes are made to the primary legislation governing the structure of the Commission and/or the procedures for a review, potentially terminating an ongoing review. Afzal Khan MP's PMB achieved Second Reading 1 December 2017, and if passed would terminate 2018 Review.	SH	Severe	Possible	16	Tolerate	Good communications with Government (sponsor team) and political party representatives to ensure earliest possible knowledge of any prospective changes, and that parties and individual MPs understand consequences of their actions.		Severe	Possible	16	Û	9	tł

16
Actions required
Actions required to ensure that residual risk = appetite
As legislative change is ultimately a matter for Parliament, there is realistically little mitigating action that the Commission can (or should) take to prevent it.

				Strateg	gic Risk	Regis	ter: 20'	18 Review of Parli	amenta	ary Con	stituen	cies			
1	2	3	4	5,6,7	- Inherent	Risk	8	9	10	11,12,7	13 - Residu	al Risk	14	15	
Risk ID	Title	Description / Indicators	Owner	Impact	Likelihood	Severity level	Response	Controls	Mitigation status	Impact	Likelihood	Severity level	Risk trend and status	Appetite	
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3	Human resource	Insufficient numbers and expertise levels of Commissioners, Assistant Commissioners and staff inhibit the delivery of the review	TBe	Severe	Possible	16	Treat	1. Regular review of staffing needs against resource plan; 2. close working with CO to fill vacancies that arise; 3. engagement of staff through staff survey; 4. broaden knowledge and capacity of retained staff; 5. capture knowledge of departing staff; 6. contingency planning for premature loss of key staff		Moderate	Remote	6	Ţ	8	
4	Financial, physical and data resource	Inadequate budget, physical accommodation or information management leads to inability to deliver review to quality and timescale required	TBe	Significant	Possible	12	Treat	1. initial budget against project plan; 2. monthly review and reconciliation meetings with CO finance; 3. scrutiny of spend requirements to ensure value for money; 4. forward planning of accomodation needs and clear advance communication of those to CO; 5. clear information management policies communicated regularly to staff and enforced		Significant	Negligible	4	$\langle$	5	
5	Technology	Hardware and/or software (particularly GIS and consultation website) unfit for purpose, leading to significant delay to the timetable and/or reputational damage	ТВо	Severe	Possible	16	Treat	1. clear and detailed supply and maintenance contracts with suppliers; 2. ongoing review of appropriate enhancements and improvements to software.		Significant	Negligible	4		4	

16
Actions required
Actions required to ensure that residual risk = appetite

	Strategic Risk Register: 2018 Review of Parliamentary Constituencies														
1	2	3	4	5,6,7	- Inherent	Risk	8	9	10	11,12,*	13 - Residua	al Risk	14	15	
Risk ID	Title	Description / Indicators	Owner	Impact	Likelihood	Severity level	Response	Controls	Mitigation status	Impact	Likelihood	Severity level	Risk trend and status	Appetite	
	Broad title	Description of risk and / or indicators	CLT member	Severe; significant; moderate; minor; insignificant	Negligible; remote; possible; likely; almost certain	Red; amber; green	Transfer; tolerate; treat; terminate	Internal controls	Red; amber; green.	Severe; significant; moderate; minor; insignificant	Negligible; remote; possible; likely; almost certain	Red; amber; green	Trend: Reducing; increasing; static; new	Red; amber; green	e
6	Reputation	Inappropriate conduct and/or errors in published material leads to lack of public confidence in BCE competence and/or independence	SH	Significant	Possible	12	Treat	1. Clear communication of expectations and policies on public service propriety; 2. develop and adhere to clear communications strategy and plan; 3. develop and apply rigorous quality assurance procedures for internal procedures and publications.		Significant	Negligible	4		4	



### Programme management - BCE 2018 Review Highlight Report 26

January 2018

Achieved / delivered (Good news/highlights)	Key risks / issues (Including mitigation)	<b>Forward look</b> (Activity over the next period, update on whether on track in the immediate/long term and status of significant milestones)
<ul> <li>Schemes and Representations</li> <li>Finalise initial high-level analysis of final consultation responses, and prepare briefing papers for Commissioners.</li> </ul>	•	<ul> <li>Commence detailed analysis of responses in individual regions with lead Commissioners.</li> </ul>
<ul> <li>PACAC hearing evidence session on 9 January for all four Commissions (plus follow-up letter clarifying certain points)</li> </ul>	<ul> <li>Afzal Khan MP's Private Member's Bill to restart review with amended rules achieved Second Reading on 1 December: maintain factual line that review must continue until such time as primary legislation stops it.</li> <li>Statutory process for final report may inhibit BCE's ability to control publication and awareness-raising activity: seeking formal handling agreement with Cabinet Office.</li> </ul>	<ul> <li>Relatively low-level outward-facing comms activity during this internal working and analysis period.</li> <li>Continuing discussions with Cabinet Office about final report handover/laying/publication co-ordination.</li> </ul>
<ul> <li>Human and Corporate Resource</li> <li>Detailed internal budget planning for 2018/19 financial year, pending formal negotiations with CO to settle budget.</li> </ul>	<ul> <li>Further review staff departures may impact capacity: mitigating through working more flexibly across teams.</li> <li>Commissioners need some form of formal performance assessment: Secretary to agree procedure with Commissioners and CO sponsor.</li> <li>Framework Agreement needs to be signed off by CO sponsor.</li> </ul>	<ul> <li>Continued planning and preparation for May implementation of General Data Protection Regulation.</li> </ul>



# Communications evaluation: Revised proposals publication and consultation

17 October - 11 December 2017

February 2018



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# 1. Introduction

The Boundary Commission for England (BCE) is currently conducting the 2018 review of Parliamentary constituencies in England, with the final report due to be submitted to Parliament in September 2018. As part of preparing our recommendations we have held several public consultations to ensure our recommendations both meet the requirements of the legislation and include consideration of public opinion. The last of these consultations ran from 17 October 2017 (when our revised proposals were published) to 11 December 2017. Before and during this period, as we have done throughout the review, we wanted to raise awareness of the review and encourage engagement with the consultation process. This paper evaluates the revised proposal consultation campaign. A full evaluation of the 2018 Boundary Review communications activity will be provided at the end of the review, with overall lessons learned and recommendations for future reviews.

# 1.1. What we did

Building on the approach used during the first two consultations, a more proactive approach to communications was employed than has traditionally been the case for boundary reviews. In past reviews traditional forms of advertising were used, mainly publication of adverts in key national papers, media interviews were approached with caution, and digital communications weren't considered or initially even an option. For the 2018 Boundary Review we want to ensure awareness of the review is raised and encourage people to contribute to the consultation. In addition, we want the majority of contributors to make representations via the portal (which we are using for the first time). We set an initial target of 70% of all representations being submitted through the portal, rather than email or in hard copy.

# 1.1.1. Objectives

The aim of the communications throughout was to - 'Inform, engage and educate, while reassuring citizens':

**Inform**: Ensure key audiences are aware the review is happening. Let as many people as possible know they have the opportunity to have their say and how to do this.

**Engage**: Encourage citizens to go online or come to face to face hearings to view proposals and discuss and share local ties. Position local people and communities as the experts needed to help shape local areas, ensuring local ties are taken into consideration.

**Educate**: Reinforce that the boundary review is a fair and trustworthy, process. Convey that the consultation is genuine and does not have a predetermined outcome.

Reassure citizens that 'day-to-day life' won't change for instance their bin collection and local schools.

# 1.1.2. Strategy

The communications approach utilised multiple channels to reach a wide audience – we primarily wanted to engage those who are currently eligible to register to vote but were also aware there was a secondary audience in those who will become eligible to register to vote between now and the next general election, when boundary review changes would be instigated. With this in mind we chose to proactively engage with national and regional media, place adverts in national newspapers and on radio, support our own social media content with promoted posts on Facebook and Twitter, advertise on local newspaper sites and local council sites and engage with key stakeholders. Each of these is considered in more detail below.



# 1.1.3. Key messages

- The key messages we wanted to deliver through our revised proposal communications were:
  - The Boundary Commission for England is an independent body that is reviewing proposals to reduce the number of constituencies in England to make them more of an equal size.
  - We need the help of local people and communities to help shape areas ensuring they take into account important local ties.
  - It's easy to help us and have your say. You can view the proposed changes online and have your say in a couple of minutes.
  - You can find out more about the review and the different ways to get involved online at <a href="http://www.bce2018.org.uk">www.bce2018.org.uk</a>.

# 1.2. Key results

The number of consultation responses during the eight-week revised proposal consultation period can be broken down by how they were received, indicating that **10,749** contributions were made through the portal with only **397** via email and post. Therefore, during the revised consultation **96%** of responses were made directly through the consultation portal. This was an increase on representations made through the consultation portal during the last two consultations, noting that during the initial proposals **88%** of representations were made via the portal during this consultation. Overall, across the three consultations **90%** of all responses were received directly via the consultation portal, far exceeding the target set at the beginning of the review of **70%**.

Online engagement in general was good. The click through rates (CTR - the percentage of people who see our adverts who then click on them) for our paid-for advertising was higher than the average seen in government campaigns and statistics suggest numbers who went on search their postcode was also good. Again this reflects well on our aim to encourage engagement with the review process, although as will become clear the performance dipped slightly during the revised proposal consultation.

As was the case during the initial and secondary consultation periods, the vast majority of media coverage was balanced, helping to present the Commission as trustworthy and independent. Coverage in regional papers made the review relevant to local communities, again encouraging engagement.

These results show that the campaign achieved its objective of encouraging engagement in the review process. Unfortunately, we are unable to track changes in awareness levels. However, it can be expected that awareness of Boundary Reviews was low before the 2018 Review was launched because it's not a campaign about policy or legal obligations that people should already be adhering to (e.g. speed limits, tax returns). Good engagement following the launch of the review would therefore indicate some degree of increase in awareness - although we are unable to put any figures to this. As agreed after the initial consultation, the awareness level was not tracked for the secondary and revised consultation, as there was probably little value to be gained in tracking the levels without an indication of the awareness levels before, during and after the first consultation. Tracking awareness levels during future boundary reviews could be considered if the benefit of the additional insight was likely to improve our communications and evaluation and could justify the spend.

# 1.3. Key lessons learnt

This report considers the successes and areas for improvement identified in our communications around the publication of our revised proposals and the consultation on these. Our key lessons learnt during the first two consultation periods were:

Communications evaluation: Revised proposals publication and consultation

17 October - 11 December



- Plan early allow plenty of time to plan communications, both paid-for and in-house. This avoids last minute rushes and allows plenty of time for narrative development and testing.
- Dedicated professional communications support is needed early in the process, throughout the duration of the first consultation and thereafter. This allows them to contribute to planning, implementation and evaluation.
- Measurable objectives should be established for all channels (not just paid-for) to support good evaluation.
- Advertising works well and driving engagement and awareness especially on local newspaper sites and Facebook.
- Regional media should be considered as important as national media regional journalists often ran our content when it was tailored.
- Brief hard from the outset making it clear the Commission is politically impartial and neutral from the outset worked in our favour, ensuring coverage portrayed neutrally.
- The partner pack did not generate as much stakeholder engagement as hoped, questioning whether it is worth the resources. However, dedicating time to building ties with local councils and the Local Government Authority proved more beneficial – these stakeholders were far more supportive than the wider third sector.

The key lessons learnt from the revised proposals consultation are:

- Graphics and moving image digital/social advertising are the most effective.
- Targeting our core audiences is more likely to yield engagement in the review than taking a broader more inclusive approach.
- The highest aim of the advertising campaign should be to drive traffic to our website experiments with awareness-raising by starting twitter conversations were not as successful.
- Digital radio would have been more effective in targeting particular regions where there was less engagement or particular issues that require more evidence.



# 2. Media 2.1. What we did

We expected both national and regional media to be interested in the publication of our revised proposals on 17 October, so planned media activity at the beginning of October to focus on gaining national coverage. This included a pre-publication media briefing, circulation of an embargoed press release and allowing media access to the revised proposals the day before publication via a secure website. We then ensured spokespeople (Secretary to the Commission, Deputy Secretary to the Commission, Head of Reviews and two experienced Review Managers, all of whom had undergone media training) were available for all national and regional interview bids from 17 October onwards.

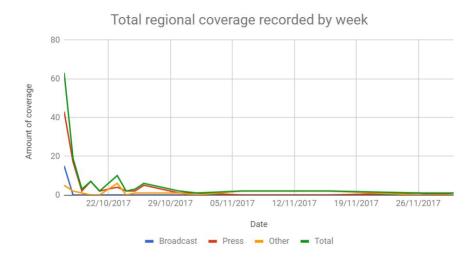
It should be noted throughout that the context of the review had changed somewhat. The general election held in June 2017, and the consequent loss of the government's majority, led to much speculation (and indeed misinformation) that the review was automatically cancelled, or at the least had no chance of ever being implemented. We can only assume or surmise that this had an effect on the engagement and participation rates for the revised consultation period, and indeed media interest.

We anticipated that after 17 October, the national media's interest in the review would wane although that of regional media continue to grow throughout October into November. We therefore focussed on regional radio adverts throughout October and November and "2-weeks to go" press release in late-November on twitter and facebook. There were fewer requests for interviews with local media outlets as the impact of the revised proposal and consultation was not as great as the initial proposal and consultation which included the public hearings.

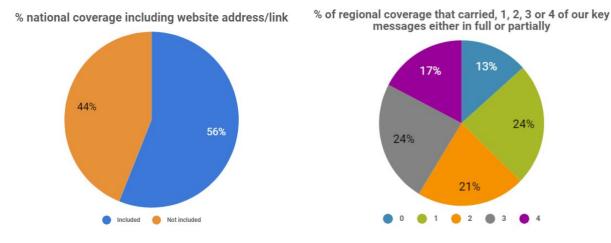
# 2.2. Evaluation

# 2.2.1. Outputs

Between 17 October and 11 December, we recorded 132 pieces of coverage (this is what we managed to record – there may have been more). This breaks down to 95 pieces in newspapers (online and print), 20 pieces on radio and TV and 17 pieces appearing in other outlets. Over three quarters of this coverage ran in the week commencing 16 October, coinciding with publication of our revised proposals, and almost 70% appeared in regional media, in the preceding weeks to the end of October.



Throughout the consultation the majority of coverage portrayed the Commission in a neutral light. Although the political aspect of the review was reported on in the majority of coverage, it was done so in a way that displayed the Commission's independence from the political outcomes. Regional coverage was more likely than national coverage to encourage audiences to "have their say" and carry our website address, with over half the coverage carrying all four of our key messages and our website address.



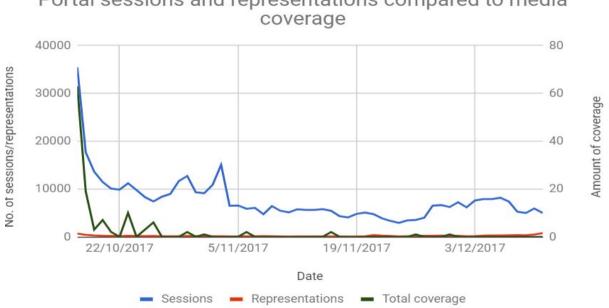
# 2.2.2. Impact

The impact of our media work is to some extent anecdotal as we are unable to track awareness or compare coverage figures from this review with previous reviews as the data is not available. However, staff who have worked on previous reviews are confident we have received more balanced coverage during this consultation than during past consultations – that the majority of coverage portrayed us in a neutral light and respected our political impartiality supports this.

We are also able to compare levels of coverage with portal sessions and representations made via the portal. The correlation is not very strong, but you can see increase in sessions coincided with increase in coverage at the start of the consultation; although the lack of strength suggests people may read about the review but not necessarily take action straight away. Interestingly, there is a peak in traffic coming directly to



#### the portal on the 3 November with 15,050 sessions. This was followed by a steady flow in representations.



Portal sessions and representations compared to media

# 2.2.3. Lessons learnt

As with the previous consultations, regional media was the most successful channel in terms of quantity of coverage and also produced coverage that resonated on a local level helping to highlight how the changes could affect the public - making them more relatable. National coverage at the start of the consultation was beneficial, as can be seen from the number of portal sessions on the first day of the consultation driven by the national media and online presence. The highest number of portal sessions, by far, was seen on the 17 October (35,461). Unlike the initial consultation, the majority of sessions (152,668) on the portal were directed to the site from the social advertising - it had previously been from the BBC News landing page. Interviews with our spokespeople featured on a number of the BBC's national programmes including Radio 4 Today Programme, Daily Politics and BBC News at One and ITV Evening News. Attaining coverage with both channels should be invested in - the importance of regionals should not be overlooked.

During the intense media coverage, there was more interest in comments from political activists, local MPs etc. But despite this, both national and regional media consistently separated political observations from the Commission's work, showing that our hard briefing from the outset that we were impartial, independent and would not comment on political outcomes was successful. Spokespeople were rarely asked about political outcomes and in many cases reporters acknowledged that the politics was out of our hands.

There is also a Private Member's Bill currently going through Parliament, which would affect the conduct and timing of the boundary review.. The first debate took place a couple of days before the end of the consultation which brought the focus of the national media back on the review.



# 3. Social media

3.1. What we did

# 3.1.1. Organic

Following the success of the Commission's Facebook and Twitter presence during the last two consultations, we began by developing a comprehensive social media plan to ensure we produced and shared content on Facebook and Twitter on a more regular basis throughout the consultation period. This was focused on key activity each week so we could increase awareness of upcoming events to drive engagement with the consultation. Content was varied and included graphics, a video and links to blogs from members of staff. Variety was key in appealing to a range of audiences and visual content/links will always perform best. This also helped drive visits to our consultation website.

# 3.1.2. Paid-for

We again engaged a creative agency to amend and refine our brand and adverts for use on social media (writing the copy ourselves) and an advertising agency to deploy these as promoted posts and Tweets (biddable adverts) throughout the consultation period (October - December). This was intended to increase our audience reach – engaging a wider range of individuals. The audiences we targeted via Facebook were all over the age of 16 with specific interests or in various groups such as residents of multicultural communities or retired. The target audience on Twitter was those over 18 who had lived in England for over six years and were residents of mixed communities. This paid-for activity intended to drive as much traffic as possible to our website. Our learning from the initial proposals was that this was the most effective way of driving traffic to our website, and we therefore ran this element of the campaign throughout the whole eight weeks of the consultation.

# 3.2. Evaluation

# 3.2.1. Outputs

We continued to increase our organic output on social media with 4 Facebook posts and 76 Tweets between 17 October and 11 December. Content included graphics produced by Kindred, and staff blogs and videos. Posts and Tweets that consistently achieved higher engagement were those with a clear call to action and links. Addition of deadline reminders in late November also promoted engagement.

It is worth noting this Review has spent less than previous reviews and also updated its communications approach, making better use of online channels – saving money and producing results.

# 3.2.2. Impact

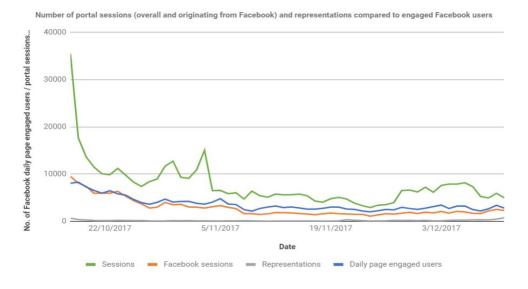
In addition to a marked increase in Facebook Likes (from 5,037 in October to 6,850 by the end of November) and Twitter Followers (410 by the end of November), engagement, as expected, increased following the publication of our revised proposals and the start of our paid-for content at the same time.

The biddable adverts on Facebook and Twitter performed better than expected for this campaign, although not as strongly as the initial consultation. Facebook adverts were clicked on more often than Twitter, a total of 204,647 times (exceeding the 172,827 more than originally planned). This translated as a click through rate (CTR) of 2.98%, impressive when the average for government campaigns is 1%. Although not as good as Facebook, our graphics still performed well on Twitter, with a CTR 0.88%, still higher than 0.28% planned.



This good performance in biddable boosted aspects of engagement with our social media channels in general with clicks, reach and impressions for all our social media content peaking during the period when adverts appeared on social media. The majority of those who saw our Facebook posts in October and December saw paid-for content rather than organic content; additionally Twitter impressions. Our Tweets earned 5.4M impressions over the 56 day period between 17 October and 11 December, with our top Tweet on the 23 November earning 698,526 impressions with total engagement of 9,229.

Engagement translated into portal sessions, with the majority of sessions coming from Facebook once paid-for content started. Changes in session numbers also correlated with the number of engaged users on Facebook.



3.2.3. Lessons learnt

For a relatively unknown organisation paid-for advertising on social media helped to raise our profile and greatly increase engagement with us on social media. This in turn drove users to our portal.

Our biddable advertising delivered good value for money with the cost per click coming in lower than expected. Carat's overarching recommendation was to replicate the main framework of the campaign due to its success. This means targeting the same audiences, using the same channels and choosing messaging with a strong call to action. However, there is always room to do more depending on budget. The most interesting suggestions included using the Facebook pixel to create customer audiences so we can retarget people that have already been engaged with our activity, this could be beneficial in a process like the Review where there are several stages individuals can get involved at.

For this consultation the weakest performing social media posts were those that were designed to start a twitter conversation (called 'conversation cards') - we tried this aspect as a way of comparing relative performance. We learnt from the low levels of engagement with these cards that the map-based graphic adverts that linked direct to the website were those most likely to drive traffic, and ultimate engagement, to the site.

# 4. Advertising 4.1. What we did

We ran a combination of adverts in printed press, on radio and online.

Adverts (25cm x 4cols) developed with Kindred were placed in the national media on 17 October (including the Express, Guardian, Mail, Mirror, Sun, Telegraph, Times, Evening Standard, Metro and City AM) to maximise the achievable coverage and awareness on one single day. In addition adverts were placed in specialist media throughout the consultation to reach under-represented audiences, such as disability publications. We secured better prices for the adverts in the specialist media by taking unfilled spots close to copy deadlines and negotiating inclusion of online advertising and editorial pieces.

There were some errors in the placement and timings of the adverts in the first week. These were due entirely to errors by the newspapers and full compensation (including extra adverts being run for free) was received.

Radio adverts ran from 17 - 31 October and the final week of the consultation across regional stations. As our campaign was focussed on England audiences alone, we missed some potential audiences due to not being able to advertise on UK wide stations, which tend to have growing audiences. There were also errors by certain stations in the playout of the adverts, which for a short time were also heard in Northern Ireland. Again, compensation was achieved for these errors.

We worked with Carat to buy advertising space online targeted at key audiences. Biddable advertising began in October and focused on Google Search, Facebook and Twitter (Facebook and Twitter is covered in section 3. Social Media). Digital Display advertising also ran throughout the consultation and consisted of open marketplace (OMP) advertising using audience targeting, contextual targeting and keyword targeting (most adverts were delivered through keyword targeting within OMP and overall); and private marketplace (PMP) advertising on local newspaper sites and local council advertising. We also trialled new 'avid' video advertisements on a small scale, in order to test their effectiveness.

# 4.2. Evaluation

# 4.2.1. Outputs

We planned to run adverts in ten papers but due to an error (mentioned above) the Daily Telegraph and Daily Mirror failed to run the advert on the launch day. Adverts appeared in The Times, Financial Times, Daily Mail, The Sun, Guardian, Daily Express, Evening Standard, Metro and City AM. All eight papers ran the adverts in their first half, with 29% running adverts in the first quarter of their publications. 23% of insertions were upgraded from a first half guarantee to appear in the 1<sup>st</sup> 25%, three insertions appeared 1<sup>st</sup> in format and Page 3 of the Financial Times was secured. The adverts were seen by almost 2 million people.

Two bursts of radio adverts were aired on 20 channels covering the first two weeks of the campaign and the final week before the deadline, reaching almost 4 million listeners (better than expected). However, opportunity to hear the advert was higher in the North East (56%) and the lowest reach in the Eastern Region on 32%. A combination of networks and smaller regional stations, including BAME stations to ensure strong coverage throughout England.

Under biddable, we spent the least on Google. The search volume peaked on 17 October at the launch of the revised proposal, with some additional smaller peaks in the days leading up to the deadline. In general,



search volume for the topic is incredibly low, showing good awareness by those searching for the boundary review of the BCE's url, and website.

Digital Display adverts succeeded in surpassing the impressions target of around 26 million by 11%, achieving over 29 million impressions.

# 4.2.2. Impact

Unlike online advertising it is more difficult to assess the impact of either printed. We are able to tell how many people saw or heard adverts but not how they acted following this without relying on individuals to tell us how they heard about the review. On the radio adverts, the overall strong level of reach of over 10 million and frequency despite limitations of advertising within England only boundaries.

The regional issues on playout error from First Radio and Bauer have resulted in overhauls of processes from both their sides to ensure that the issues do not occur again.

Our paid search results drove 13,832 clicks at a strong click through rate of over 14% (well above the government average), of which 12,264 landed on the home page. 66% of these lands then carried out a postcode search - suggesting a fairly good quality of engagement even if volumes were low.

The impact of digital display was better than expected, with almost 32,500 clicks on the adverts (84% higher than expected). This meant value for money was delivered, as the cost per click was almost 50% lower than expected, although it was not as low-cost as biddable. However, the engagement delivered by these adverts was of a high quality, with over 40% of those driven to the website going on to carry out a postcode search - and this doesn't include those who searched by region or navigated to other pages.

# 4.2.3. Lessons learnt

Carat highlighted ways to improve volume on Google Search ads but the value of this is questionable as our website was appearing first in organic searches, which cost us nothing. It would be worth considering whether to use this channel again in future review.

Carat highlighted that for future campaigns digital radio could be utilised in order to target particular postcode segments that may be affected by boundary changes.



# 5. Stakeholders 5.1. What we did

As we did prior to the initial and secondary consultations, we worked with Kindred to refine and develop our partner pack for stakeholders. This included a guide to the review, posters, social media infographics, news release templates, blog templates and a factsheet. This was placed on our website and we contacted stakeholders (a mix of local government and third sector stakeholders) ahead of the publication to ask them to help promote the Review either by using the resources in the pack or through social media. In addition we worked with the Local Government Authority (LGA) to raise awareness of the review through their channels and encourage local councils to support our communications by using the pack, including writing a blog that was published in local council publications LGA First and the Municipal Journal.

# 5.2. Evaluation

# 5.2.1. Output

Local Government were most supportive with various councils using the resources provided to post on Facebook and Twitter as well as following us on social media and sharing our posts. They would have received the resources directly from us but also via LGA who ran a feature in their magazine and carried several reminders and calls for support in their communications bulletin. LGA felt this was one of the best instances of joint-up working between local and central government.

# 5.2.2. Impact

The impact of our stakeholder work was two-fold, with the real value perhaps less in the promotion of the review and more in the development of good working relations. Firstly, our messages were endorsed by trusted sources (local councils) in a public domain (social media) potentially increasing our reputation. Secondly, and as highlighted above perhaps more importantly, our relationship with the Local Government Authority developed throughout the campaign, with them providing valuable communications support and providing positive feedback on our approach to working with them.

In addition also, quite a number of local authorities had our key messages and links to our website on their websites and were encouraging locals to have their say.

# 5.2.3. Lessons learnt

It is hard to measure the effectiveness or take-up of the partner pack. However, engagement with local council stakeholders is relatively resource-low and increases the profile of the Commission, so there is value in continuing with this approach in the future.



# 6. Conclusion and forward look

Lessons learnt from the last two campaigns resulted in a more coordinated approach to communications throughout this consultation, which has led to steady balanced media coverage and strong social media engagement. This has driven visits to our website and we know anecdotally has raised awareness. We have successfully encouraged the majority of people who took part in the consultation to make representations online and generated discussion around the review on social media.

It is clear that the changed context of the review may have affected the levels of interest and engagement. While the number of representations was high (at over 10,000 it was significantly more than at the same stage at the last review), and the performance of the social media and digital advertising was stronger than industry standards, it had reduced from the initial consultation stage. This may be down to campaign fatigue, or due to more of the public assuming that the review had either been cancelled or would not get implemented.

While we reached a lot of people through online advertising and social media, there will remain a clear need for more traditional forms of communications as not everyone uses the internet. This made the media coverage we secured valuable, especially in terms of encouraging people to find out more. The value for money of the printed and radio adverts is questionable, it is likely the value in these lies in their use at the beginning of the review to raise initial awareness and that they don't need repeating throughout the review. Their potential value should be thoroughly considered before using at future reviews, as an ever digitising world could reduce their impact in the future.

### General Data Protection Regulations and information management review

- The European Union's General Data Protection Regulation will come fully into force from 25 May 2018, updating legal requirements as to the collection and processing of personal data (currently grounded in the Data Protection Act 1998). Although the BCE's work - being constitutional in nature - is outside the area of EU competence, a new Data Protection Bill currently before Parliament will extend these requirements to all areas of public administration not directly covered by the GDPR (other than law enforcement and the intelligence services), in an 'applied GDPR' scheme. A summary of the new requirements, and how BCE meets (or proposes to meet) those (in relation to its two key sets of personal data), is set out at Annex A.
- 2. This paper considers the implication for BCE's data protection arrangements and, in particular, recommends certain changes in order to secure compliance with the new requirements. It also takes the opportunity to refresh the BCE's broader records retention periods.

### BCE as data controller

- 3. The BCE has for some years been registered (independently of Cabinet Office) as a data controller, a role on which most of the ultimate responsibility for ensuring proper processing of personal data crystallizes. Our understanding from previous legal advice was that there was no legal obligation on BCE to be a controller, but as an independent arm's length body we could take that role. We have done so to date, on the basis that Commissioners have felt it appropriate that that data be legally in the control of ourselves rather than a sponsor Government department, given the purpose of the collection of data, and our independent nature.
- 4. With the impending introduction of a revised data protection regime, we have sought clarification on whether that previous position still holds. Initial advice is that as BCE does not have its own 'legal personality', it could not be its own data controller. This would leave us as being in the uncomfortable position of not being the legal controller of the data we collect for our statutory purposes, and we are therefore seeking to gain firm confirmation on this fundamental point.
- 5. Even were BCE able to continue as its own data controller, we recommend that BCE seek to be a data controller only for personal data processed in relation to its specific statutory responsibilities, i.e: a) data from the full electoral registers, which is sent to us annually; and b) data from the responses to consultations we conduct during a constituency review. Other data that is collected and processed as part of more generic public administration (e.g. staff data, and data from general public correspondence) should default to the sponsor department as data controller. The reasoning for this is partly the very limited resource (particularly between active reviews) and expertise available in the Secretariat to properly fulfil the duties (particularly in between active reviews). Primarily, however, the reason for leaving control of personal data processed within these 'general public administration' tasks with the sponsor department is that it reflects the reality of the arrangement: in common with many business units within that department's aegis, such data will both be generated and handled in accordance with departmental policies, and held on IT systems provided by

the department.

#### Control of a separate data processor

- 6. GDPR gives specific recognition and responsibility to the role of a 'data processor', recognising that this role may be distinct from the data controller. In practical terms, this recognises that the body that actually holds and processes the data may not be the same as the legal data controller, but must therefore act under the authority (and instruction) of the latter. In order to demonstrate that the processor is acting under the enforceable instruction of the controller, the data controller must ensure that appropriate data protection requirements are written into the contract with the supplier of the processing service (or the equivalent legal instrument for non-contractual relationships).
- 7. Data from consultation responses during the 2018 Review of Parliamentary constituencies is currently held in a database established and maintained by a third party IT provider under contract, so we will ensure (through the Cabinet Office as the named legal personality in the contract) that appropriate data protection provisions are included in that contract to cover appropriate handling by the supplier and the sub-contracted server provider. Electoral register data, representations from previous constituency reviews, and general public administration data are all held on Cabinet Office IT systems provided to us, and we are working with lawyers to ascertain the most appropriate legal instrument in which relevant data protection provisions can be inserted, given the nature of that relationship: this is most likely to be specific provisions included in a Memorandum of Understanding between BCE and the sponsor department.

#### **Data Protection Officer**

- 8. A public authority must appoint a Data Protection Officer (DPO), whose duties involve: informing and advising the organisation of its obligation under GDPR and other data protection legislation; monitoring compliance, managing data protection activities, training staff, conducting internal audits; and being the first point of contact for supervisory authorities and individuals whose personal data is processed. Accordingly, they are required to: report directly to the board of the organisation; act independently and not be penalised for conducting their duties; have professional experience and knowledge of data protection law; and have provided to them sufficient resources to conduct the duties and responsibilities of their role.
- 9. A single DPO may be appointed for a group of public authorities. In light of the limited staff resource and data protection expertise available within the BCE (particularly outside of an active review), the likelihood of BCE not being its own data controller, and the requirement for the DPO to be able to act independently, we recommend that the BCE come within the ambit of the DPO appointed for the sponsor department.

#### **Data retention periods**

10. The implementation of GDPR - and particularly the principle relating to retaining personal data only for as long as it is necessary - affords the opportunity to consider afresh what the BCEs retention periods should be for all the information and data that it generates. Annex B sets out the broad categories of data that BCE generates, and makes a recommendation for an appropriate retention period for each one. **Commissioners are invited to give their views on the recommended retention periods specified in** 

**Annex B**. These will then be discussed with the Information Management team in the sponsor department and The National Archives, before final agreement with Commissioners by email.

### **Refresh of the Data Protection and Privacy notice**

11. The implementation of the new GDPR requirements will necessitate some modification to the BCE's Data Protection and Privacy notice, provided to the data subject at the point at which their data is collected. Though most obviously used in relation to consultation responses (see item 1c at Annex A), a notice should be provided at any point the BCE collects personal data (e.g. through general correspondence from individuals, which contains their name and physical or email address). The Secretariat is currently developing an updated notice, a draft of which will be circulated and agreed with Commissioners via email following the current meeting.

### Annex A

### Requirements of GDPR and application to main BCE-specific data processing

GDPR establishes seven core principles (realistically six, as the seventh is simply to demonstrate compliance with the first six).

Requirement	How BCE meets the requirement (or will by May 2018)
1a) Personal data must be processed lawfully. Most relevantly for public authorities, this will manifest as either: a legal obligation/public task placed upon the public authority; or individual consent to processing, provided by the data subject.	For collection of electoral register data, statutory authority is provided, as BCE is one of the bodies entitled to a copy of the 'full' version of the electoral register maintained by local electoral registration officers (named in the Representation of the People (England and Wales) Regulations 2001, regulation 101).
	For consultation responses, statutory authority is provided by the specific requirements to consult, set out in section 5 of the Parliamentary Constituencies Act 1986.
1b) Personal data must be processed fairly. The data subject should not be misled or deceived about the processing, or have their data processed in a way likely to cause distress.	BCE does not collect the electoral register data directly from the data subject, but the Regulations very tightly prescribe how we may process the data, restricting it to activities 'in connection with their statutory duties'.
	For consultation responses, respondents are notified clearly and explicitly - via a data privacy notice - of the manner in which their personal data will be processed, at the point it is submitted.
1c) Personal data must be processed transparently. The data subject must be properly informed about the processing activity, at the point at which the data is collected. There is an extensive list of	BCE does not itself collect the electoral register data directly from the data subject. However, we propose to 'de-personalise' this data in any event (see below).
specific information about the processing that must be set out.	For consultation responses, although there are not further consultation stages planned in the 2018 Review, in preparation for use in future reviews, we should refresh the wording of the Data Protection and Privacy notice that is provided to respondents, ensuring that it complies with the new detailed information requirements.

2) Only collect the data for one or more specified, explicit and legitimate purposes, and not further process it in a manner that is incompatible with those purposes.	In the case of electoral register data, this is collected for the purpose of aggregating statistical figures on the number of electors in any given geographic area of England, in support of: a) calculating the distribution of constituencies across the UK; and b) determining where boundaries between constituencies should be drawn, so as to ensure elector numbers remain within the statutory permitted numerical range. In the case of consultation responses, the data is collected to inform considerations of the weight of evidence adduced in support or opposition to proposals on constituency boundaries in a specified statutory boundary review.
3) Personal data must be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.	Electoral register data is collected for the reasons as specified in the previous entry. This process does not actually require the names of individuals, and we therefore remove name data from each electoral register on receipt, thus 'depersonalising' it. We have for some time been pressing for the data to be provided to us already in depersonalised form, though this will require government legislation to be implemented. Consultation responses require full name and address details of the respondent, as these are integral to consideration of the weight of evidence being adduced in a consultation based geographic options.
4) Personal data must be accurate, and where necessary kept up to date, with inaccurate data being erased or rectified without delay.	Electoral register data is intended to be a snapshot in time (particularly in a live review). Separately from an active review, electoral register data held by BCE is updated annually to 'keep under review' constituency sizes, in accordance with its overarching statutory duty. Consultation response data inaccuracies are corrected on receipt of notification. Consultation response data is intended to be accurate 'at a given point in time', so data does not need updating.
5) Personal data must only be kept for as long as it is necessary for the purposes for	See Annex B for proposed refresh of retention times for BCE data (personal and

which it was collected	non-personal).
6) Ensure that the personal data are appropriately protected against loss, destruction, or unauthorised access	Electoral register data is held only in electronic form within the Cabinet Office IT system. As such, it is covered by Cabinet Office and HM Government IT security policies and procedures, to protect against loss, destruction and unauthorised hacking. Consultation responses are held on external databases under contract with a third party provider. Contractual clauses (drawn up by the Crown Commercial Service) to require appropriate data protection against loss, destruction or unauthorised access (such as to meet GDPR requirements) are being inserted into that contract.
7) Be able to demonstrate that BCE is compliant with the six data protection principles above.	The data controller must keep a 'processing record' for each data processing activity, providing an extensive list of information in relation to that activity. BCE will maintain such a processing record (or, if not its own data controller, provide such a record to the appropriate data controller).

There are then six further notable more specific requirements placed on a data controller, as follows:

Requirement	How BCE meets the requirement (or will by May 2018)
8) Comply with the rights of data subjects, e.g. to access the data held about them, or to object to its processing	BCE commits to doing so.
9) Only transfer personal data outside of the European Economic Area if appropriate safeguards are in place	BCE data held outside of the sponsor department's network (which is itself subject to HM Government rules about server hosting outside the EU) is contractually required to be held on servers within the EU.
10) In the event of a personal data breach, notify the Information Commissioner promptly, and no more than 72 hours after becoming aware	BCE commits to doing so.
11) In the event of a data breach, notify data subjects who are affected, where	BCE commits to doing so.

appropriate.	
12) Where required, ensure that a Data Protection Impact Assessment is carried out before high risk processing activities are commenced.	BCE commits to doing so, on advice from its Data Protection Officer as to the circumstances in which it would be appropriate.
13) Ensure that any processing carried out on behalf of the data controller (e.g. by a third party company) is subject to appropriate safeguards.	As noted in the cover paper, the only personal data processed outside of the BCE and sponsor department's system is the consultation responses processed under contract by the third party provider of the consultation website. The contract under which this service is provided incorporates appropriate data protection clauses, specifically drafted by the Crown Commercial Service to address the requirements of GDPR.

### Recommended retention periods for BCE data

The table below makes recommendations as to retention periods for generic categories of data held by BCE - individual records within any given category may be identified for longer-term retention by the Secretary to the Commission on a case-by-case basis.

Description of data	Retention period
Consultation responses from the current review (includes personal data)	Hold until the subsequent Statutory Instrument is passed (or, if applicable, the Review is terminated earlier for any reason).
Consultation responses from previous reviews (includes personal data)	Destroy, in line with entry above.
Electoral registers (should have been de-personalised on receipt)	For most, destroy when new annual update for the relevant area is received. Exception is the particular register to be used for a statutory active review, which should be retained until the subsequent Statutory Instrument is passed (or, if applicable, the Review is terminated earlier for any reason), then destroyed.
Aggregated electorate data	Keep indefinitely (it provides a historical record of how constituency electorates have changed from year to year, which we are sometimes asked about).
Formal Commission meeting papers and minutes (final versions: drafts should be deleted once final versions are agreed)	For Reviews that result in implemented constituencies, keep for five years, before archiving and subsequent potential transfer to The National Archives. For Reviews that do not result in implemented constituencies, keep for two years from end of that review, before archiving. For meetings outside of an active Review, keep according to the status of the next following Review.
Informal internal policy development papers relating to a Review (textual and mapping)	Hold until the subsequent Statutory Instrument is passed (or, if applicable, the Review is terminated earlier for any reason), then destroy.
Locally-held personal data about individual Commissioners, Assistant Commissioners, or staff (e.g. individual performance assessment, and public appointment records).	Keep for 12 months after the individual has left the BCE (or been unsuccessful in an application for a position), then destroy.

Legal advice	Retain for as long as the issue in question remains operative, then archive.
Notifications from the Local Government Boundary Commission for England	Destroy after 12 months (information about current reviews is on the LGBCE website, and changes are made by Statutory Instrument, which are on legislation.gov.uk).
General correspondence (i.e. other than consultation responses)	Destroy 12 months after end of calendar year during which it was received. Exceptions to be retained are: correspondence with the Speaker of the House of Commons (and their Office); and formal correspondence with the sponsor department, both of which should be kept for five years, then archived prior to potential transfer to The National Archive.
Financial, procurement and contractual papers	Retain for 12 months after end of financial year to which they relate, then archive until six years from date of creation, then destroy (in case of possible legal action: accords with statute of limitations period for civil actions).
Other documents relating to the logistics and general administration of the BCE (other than financial, procurement and contractual papers)	Retain for five years, then destroy.

### Arrangements for closing stages of 2018 Review

 This paper considers in more detail the procedure for the closing stages of the 2018 Review, expanding on the outline set out in the project plan annexed to Paper 1 of this meeting. Whilst this paper is largely for information (key meeting dates that underpin the process having already been agreed), Commissioners may wish to discuss with the Secretariat any of the procedural aspects of these closing stages of the review.

### Development of final recommendations, February – May 2018

- 2. Having conducted analysis of all the responses to the revised proposals consultation, review staff of the Secretariat will for each region work with the designated lead Commissioner for each region to consider what final amendments may be appropriate to the revised proposals, in order to take account of the evidence presented in the consultation responses. A number of days through late February and early March have separately been agreed already with the respective lead Commissioner for an initial briefing meeting and discussion on each region. This will be followed by iteration through March of possible alternatives between the relevant review team and Commissioner remotely via email and telephone, concluding with final sign-off meetings between the teams and the relevant Commissioner on agreed dates in the week of 26 March. It is possible limited site visits may be required during this time.
- 3. The outcome of this analysis with the lead Commissioner will be written up for each region in the form of formal papers to go to a series of Commission meetings agreed for late April through late May, at which the full Commission will discuss in detail and decide for each region what their formal recommendations will be in their final report.

#### Drafting and approval of final report, June - July 2018

- 4. Once the core substantive decisions (i.e. the composition of each constituency to be recommended, and the reasoning) are agreed, the Secretariat will draft the text of the final report to be formally submitted to the Government. During this period the Secretariat will also produce the final maps to accompany the report, using the GIS software.
- 5. Substantive draft text will be cleared during this period remotely by email with Commissioners. However, at this early stage we invite Commissioners to discuss and agree (or amend) the structural outline for the final report, attached at Annex A. Commissioners are invited in particular to comment on the 'lessons learned' section, providing a steer to the Secretariat as to the type and amount of comment they wish to put in the statutory report.

#### **Quality Assurance checking, August 2018**

6. Through August, the Secretariat will conduct final quality assurance checking of both the text and mapping files for language and factual accuracy. This period will also see close liaison with the printers to ensure the output files are correct and accurate in both print production and accessible web-enabled versions.

### Submission of final report, September 2018

- 7. The legislation requires the final report of the 2018 Review to be submitted 'before 1 October 2018, but not before 1 September 2018', and the progress of the review to date indicates that we will successfully meet that requirement.
- 8. The legislation requires the final report to be submitted to 'the Secretary of State or Leader of the House of Commons'. Under normal circumstances, the final report would be provided to the Secretary of State of the BCE's sponsoring department (currently Cabinet Office). However, as of late December 2017 there has been no Cabinet Office minister designated as a Secretary of State. The Secretariat is therefore currently discussing with the Cabinet Office sponsor team who would be the most appropriate Government Minister to formally address the final report to.
- 9. The Commission will wish to publish its final report and recommendations as soon as possible after submitting them to the Government. We are working with the three other commissions on the most appropriate mechanism for doing this to ensure the fullest transparency of the process, while adhering to any Parliamentary protocols.

#### Implementation of new constituencies, post September 2018

- 10. The legislation provides that following receipt of the final reports of all four Parliamentary Boundary Commissions covering the UK, the Government must 'as soon as may be', bring before Parliament a single UK-wide Statutory Instrument (SI), to give effect – without amendment (unless requested by the relevant Commission) to the recommendations in those reports. The SI is 'draft affirmative' in nature, meaning a draft of it must be actively debated (and approved) by both Houses of Parliament before it can be properly 'made'. If it is so approved and made, the SI itself will specify the date on which it comes into force, but it cannot take effect before the next following General Election to the House of Commons. If the SI is rejected by either House, the Government may - in those circumstances - amend the draft and resubmit.
- 11. As will be appreciated, this part of the process occurs after the Commission's final report has been handed over, so the timing and passage of the SI will therefore be entirely in the hands of the Government and Parliamentary Business Managers.

Annex A

## 2018 Review - Final report skeleton

### Volume 1 - Narrative report

### Chapter 1 - The administration of the 2018 Review [much taken from Guide]

### Legislative framework and source data

- Statutory duty of the Commission
- The electorate and LG boundaries to be used
- Allocation of constituencies to four parts of UK (inc. protected constituencies)
- Electoral quota and permitted electorate range
- Other statutory factors
- Requirement to report to Government

### **BCE** policies

- Further distribution of England constituency allocation between nine regions
- LG boundaries: adjacent whole wards as building blocks, avoiding ward splits and orphan wards; trying to respect county boundaries
- Things we don't look at: political support; post-2015 electorate change (unless otherwise balanced decision); post-2015 wards (unless can make a May 2015 ward-split replicate a post-2015 ward boundary)
- Naming of constituencies
- Designation of constituencies

**Progression of 2018 Review** (mention aborted 2013 Review and that 2018 was therefore treated as 'the first review' after 2011 legislation in terms of the statutory reference?)

- What
- When
- How
- Stats (where available)

### Learning from 2018 Review

Matters that might be included:

- Success of the consultation portal
- Questionable continued value of physical place of deposit in every constituency
- Reduced cost of the 2018 Review compared to 2013 Review
- Difficulty of working at lower than ward level (inconsistency of data availability and quality)
- Very mixed attendance at public hearings (scheduling after first consultation would be better)
- Administrative undesirability of 'three years (full) on, 2 years off' review cycle
- Lack of synchronicity with local government rewarding
- Extended period of time that is passing since last implementation of a constituency refresh
- Given our output, why do PBCs report to Govt (who add no value), when LGBCE reports directly to Parliament?

### Chapters 2-10 - Regional chapters

Nine individual chapters, one for each region, with common structure for each, as follows.

#### Pen-picture of the region

- Current and new number of constituencies (including number of current outside of permitted electorate range)
- Principal local government arrangements (counties/districts/unitaries)
- Key physical geography (e.g. mountains, significant hill ranges, big rivers)
- Key social geography (e.g. strong local identities, particularly where distinguished from neighbouring areas)
- Dates and locations of public hearings held in the region

#### Sub-division of the region

- 'Theoretical entitlement' and the Initial proposals sub-region split
- Responses to the split and any consequent changes at revised proposals
- Responses to any revised split and what the final split is

#### Final sub-region (each)

- Initial proposals (summary)
- Responses to the initial proposals, including secondary consultation respondents comments on others' views (summary, without portal reference numbers)
- Revised proposals (summary)
- Responses to the revised proposals (in more detail, but still without portal reference numbers)
- Final decisions of Commissioners on all constituencies, with reasoning

#### Volume 2 - Recommended constituencies data and maps

- Region-by-region listing of individual recommended constituencies, covering names, designations, component wards, and ward and constituency electorates.
- For each recommended constituency have the illustrative map on the page opposite.

#### 2018 Review - towards the final recommendations

- This paper provides details on the representations received in response to the consultation on the revised proposals. It also outlines the overall number of representations and campaigns received in response to all three consultations. Included with the paper are nine regional appendices which detail the key issues that have arisen during the consultation on the revised proposals, lists the counter-proposals received (including those that suggested the splitting of wards) and proposals for alternative constituency names.
- 2. Whilst this paper is largely for information, Commissioners will want to familiarise yourself with the representations and you may want to remind yourself of the changes between the initial and revised proposals.

#### **Common national issues**

3. We received over 35,000 representations across the country over the three consultation periods. Of these, approximately 10,700 were received in response to the consultation on the revised proposals. The spread of representations has not been even across the country. Representations received for each region are broken down in the table below. In addition, we have also received a number of petitions and writing campaigns during the final consultation. The total number of writing campaigns and petitions for each region is also provided in the table below.

Region	Consultation on revised proposals	Total representations	Total - petitions/ writing campaigns
East Midlands	421	2,048	6
Eastern	777	2,806	11
London	2,390	11,764	28
North East	540	1,968	7
North West	987	4,040	18
South East	2,511	5,438	26
South West	952	2,971	3
West Midlands	1,095	3,200	8

Yorkshire and the Humber	1,076	3,059	14
TOTAL	10,749	37,294	121

- 4. In every region we have received representations that have not commented on specific boundaries, put forward alternatives or commented on names. These representations have largely focused on the following issues:
  - Opposition to the reduction in the number of MPs/constituencies
  - Opposition to having constituencies of equal size
  - Opposition to the use of the December 2015 electoral data
  - Opposition to using ward boundaries from May 2015
  - Concerns that the proposed boundaries reflect a political bias
  - Opposition to the proposals crossing county boundaries
- 5. We have not received regional-wide counter-proposals for every region in response to our revised proposals published in October 2017. In most cases, counter-proposals received during this consultation have been localised and focused on modifications to a small number of constituencies rather than across the entire region. These counter-proposals have been received from the central and local offices of the political parties, some politicians, and some individual members of the public. The central offices of the Conservative Party and Labour Party have made representations for all nine regions. The central offices for the other political parties did not submit a representation for each region, but in most cases the local offices have done so.
- 6. In some regions we have received counter-proposals that suggest dividing wards between constituencies. Details of these are provided in the regional appendices.
- 7. Representations have also been received that comment only on the proposed names of constituencies. In some cases these have been localised comments; however, we have also received representations that have specifically commented on the Commission's approach to naming constituencies - i.e. length of name, cities/towns used in the constituency name and geographical context e.g. north/south.

#### Next steps

 Commissioners will want to familiarise themselves with the representations outlined in the appendices, particularly those for regions for which you have been designated the lead Commissioner. The review staff of the Secretariat will

 for each region – work with the designated lead Commissioner for each region

 to consider what final amendments may be appropriate to the revised proposals. A number of days through late February and early March have separately been agreed already with the respective lead Commissioner for an initial briefing meeting and discussion on each region.

BCE/2018/Paper 5 - Annex A



# **COMMISSIONERS' INFORMATION PACK**

# **EASTERN REGION**

# FINAL RECOMMENDATIONS

# February 2018

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- 3. We have not received regional-wide counter-proposals for every region in response to our revised proposals published in October 2017. In most cases, counter-proposals received during this consultation have been localised and focused on modifications to a small number of constituencies rather than across the entire region. These counter-proposals have been received from the central and local offices of the political parties, some politicians, and some individual members of the public. The central offices of the Conservative Party and Labour Party have made representations for all nine regions. The central offices for the other political parties did not submit a representation for each region, but in most cases the local offices have done so.
- 4. In some regions we have received counter-proposals that suggest dividing wards between constituencies. Details of these for this region are also provided later in this document.
- 5. Representations have also been received that comment only on the proposed names of constituencies. In some cases these have been localised comments; however, we have also received representations that have specifically commented on the Commission's approach to naming constituencies - i.e. length of name, cities/towns used in the constituency name and geographical context e.g. north/south.

# Eastern regional information

#### Number of representations received

6. In the Eastern region, the Commission received a total of 777 representations during the consultation on the revised proposals. In total the Commission received 2,806 representations for this region. There were also a number of duplicate representations within this total, as well representations that made general comments that did not have any bearing on the substance of the initial or revised proposals.

Type of respondents	Consultation on revised proposals	Total number of representations
Member of Parliament	6	31
Official political party response	5	16
Peer from House of Lords	0	0
Local councillor	36	160
Local authority	9	23
Parish or town council	17	42
Other organisation	5	43
Member of the public	699	2,491

7. The Commission received representations from the following respondents:

### Campaigns

Total

8. As expected, throughout the region, representations from a number of organised campaigns were received. In the Eastern region, these were as follows:-

777

2,806

Campaign	ID Number	Support/ oppose initial proposals	Strength (no. of signatories)
Support for Heidi Allen MP campaign for South Cambridgeshire Villages	BCE-46922	Oppose	35
Proposed changes to the South Cambridgeshire parliamentary constituency	BCE-46523	Oppose	5
Help keep Leavesden in Watford	BCE-47924	Oppose	28
Help keep Woodside ward in Watford	BCE-51952	Oppose	97 (403 total count which includes 306 without full details)
I do not agree with the inclusion of the Kempston Rural ward in the Bedford constituency	BCE-49291	Oppose	9

- 9. In each of these instances, you will find one copy of the standard representation, together with a list of the names and addresses of those who either signed petitions, or submitted pro-forma letters.
- 10. During the previous consultations the Commission received six campaigns in relation to the Eastern region. None of these campaigns were put forward again during the consultation on the revised proposal, although the campaigns in support of Heidi Allen MP were very similar.

# Political party representations

11. Of the main political parties, each have submitted responses. There has been just one counter-proposal from a local branch of a political party (Watford Labour Party, BCE-51678), but this did not offer alternatives and variations to those submitted by the national representative of their party. A representation on behalf of UKIP (BCE-41580) makes comments only on the Ipswich Borough ward of Priory Heath. No representation was received from anyone claiming to speak on behalf of the Green Party. The Conservative Party (BCE-51943) have supported the revised proposals in their entirety, except for two constituencies in Norfolk. The Liberal Democrat Party has largely

supported the revised proposals but has made further counter-proposals to constituencies in Cambridgeshire and Hertfordshire (BCE-51274). The Labour Party (BCE-51850) broadly welcome the revised proposals with regard to Cambridgeshire, Essex, and Norfolk, but object to some of the revised proposals in Bedfordshire, Suffolk, and Hertfordshire.

Sub-regions and counter-proposals that propose alternative sub-regions

- 12. The revised proposals were constructed on the sub-regions of:
  - Bedfordshire
  - Cambridgeshire, Hertfordshire and Norfolk
  - Essex
  - Suffolk
- 13. The following counter-proposals have been received that cover either the whole region or a sub-region, and we recommend you take time to familiarise yourself with these representations:-

Organisation or Individual	ID Numbers	Affected sub-regions	Similar counter-proposal received and considered at initial proposals?
Heidi Allen MP	BCE-49050	Bedfordshire; Cambridgeshire, Hertfordshire and Norfolk; and Essex.	Yes
Derek Jacobs	BCE-50250	Cambridgeshire, Hertfordshire and Norfolk; and Essex.	Yes

- 14. The consequence of Ms Allen's counter-proposal is that only Suffolk remains as a stand-alone sub-region with all the other counties in the Eastern region combining to form a single sub-region. Although Ms Allen did not submit a separate counter-proposal to that submitted during the initial proposals consultation (BCE-23985), she has reiterated her support for this counter-proposal in her latest representation. This is only representation that has put forward alternative sub-regions.
- The wide-ranging counter-proposal from Derek Jacobs (BCE-50250) has made some further changes to the constituencies in the Cambridgeshire, Hertfordshire and Norfolk sub-region, although most of the constituencies are

identical to those he proposed in a number of representations in the initial proposals, and in the case of Essex, all of the constituencies he has suggested are identical to those he proposed in his initial proposals representations.

## Detailed analysis of representations within sub-regions

## Bedfordshire

- 16. The major issues that drew objections in this sub-region were:-
  - The inclusion of the town of Houghton Regis in the Luton North and Houghton Regis constituency;
  - The inclusion of the rural ward of Caddington in the Luton South constituency;
  - The inclusion of the Kempston Rural ward in the Bedford constituency and the consequent inclusion of the Elstow and Stewartby ward in the Mid Bedfordshire constituency.
- 17. In response to the consultation the Commission received a number of counter-proposals in this sub-region. The counter-proposals received that did not divide wards included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Labour Party	BCE-51850	Bedford, Mid Bedfordshire.	Similar to initial proposals (apart from the inclusion of Barton-le-Clay) in Mid Bedfordshire.
Andy Laird	BCE-42407	Luton South, South West Bedfordshire. Would not be valid as Luton South now 64,614 and South West Bedfordshire 80,966.	Yes

18. As in the initial proposals, those objecting to the inclusion of Houghton Regis in the Luton North and Houghton Regis constituency have, in the main, done

so because they consider that Houghton Regis has more in common with the town of Dunstable, which is located in the proposed South West Bedfordshire constituency. The representation by Rita Egan (BCE-42265) is typical of the comments received.

- 19. There also continues to be opposition to the inclusion of the Caddington ward in the Luton South constituency. The ward is geographically very large - larger that the rest of the constituency put together - and is very rural in nature. Many of the objections come from the village and parish of Studham, which is located in the far south west of the ward, furthest from Luton itself. Typical of the comments received is the representation from Geoffrey Shute (BCE-44751), although it is not considered that any significant new evidence has been provided.
- 20. There is some objection to the inclusion of the Kempston Rural ward in the Bedford constituency in the revised proposals, despite this being generally supported in the representations at initial proposals, and the consequent inclusion of the Elstow and Stewartby ward in Mid Bedfordfordshire. Although the area of the Elstow and Stewartby ward that lies north of the A421(T) road appears to be part of the continuous urban area of Bedford, the inclusion of the Kempston Rural ward in the Bedford constituency allows for all five Kempston wards to be included in the same constituency. The Labour Party (BCE-51850) object to this arrangement, preferring the initial proposals, and a limited campaign containing nine signatures was also submitted that objected to the inclusion of the Kempston Rural ward in the Bedford constituency (BCE-49291). However, there was also support for the revised proposals for the inclusion of the Kempston Rural ward in Bedford, for example, Bernard Jones (BCE-48686) and Margaret Turner (BCE-48757), who considers that Elstow has more in common with the rural villages of Mid Bedfordshire than urban Bedford.

# Cambridgeshire, Hertfordshire and Norfolk

- 21. The major issues that drew objections in this sub-region were:-
  - The cross-county constituency of Letchworth and Royston and the inclusion of the four South Cambridgeshire wards of Melbourn, Bassingbourn, The Mordens and Meldreth in this constituency;
  - The inclusion of the Milton ward in the South East Cambridgeshire constituency rather than in Cambridge;
  - The inclusion of City of Peterborough wards in the North West Cambridgeshire constituency;

- The inclusion of the Three Rivers District ward of Leavesden and the Watford Borough ward of Woodside in the St Albans constituency, and the inclusion of the St Albans District ward of London Colney in the Hertsmere constituency;
- The inclusion of the East Hertfordshire District ward of Great Amwell in the Broxbourne constituency;
- The inclusion of the Wensum ward in the Norwich North constituency;
- The inclusion of the North Norfolk District wards of Astley and Briston in the Broadland constituency rather than North Norfolk.
- 22. In response to the consultation the Commission received a number of counter-proposals in this sub-region. Some counter-proposals suggested the splitting of wards between constituencies, these are detailed later in this section. The counter-proposals received that did not divide wards included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Peter Lunsmore	BCE-41967	Huntingdon and St Neots, South East Cambridgeshire, North West Cambridgeshire. Would not be valid as the electorate of Huntingdon and St Neots would be 86,985.	No
Labour Party; Watford Labour Party; and Watford Borough Council	BCE-51850 BCE-51678 BCE-46042	Hertsmere, St Albans and Watford.	Same as initial proposals.
Sarah Rodgers	BCE-41337	Mid Norfolk, Thetford and Downham Market. Would not be valid as the electorates of Mid Norfolk and Thetford and Downham Market would be 78,625 and 65,391 respectively.	No
Conservative Party, Chloe Smith MP and	BCE-51943 BCE-51631	Norwich North, Norwich South.	Yes

John Fisher	BCE-48495		
Liberal Democrat Party	BCE-51274	Six Hertfordshire constituencies (Broxbourne, Hertford and Stortford, Hertsmere, Letchworth and Royston, St Albans, Watford), and two Cambridgeshire constituencies (South Cambridgeshire and South East Cambridgeshire).	No
East Cambs District Council	BCE-51944	North East Cambridgeshire, North West Norfolk, Thetford and Downham Market.	No

- 23. The Commission has also received some support for its revised proposals in the Cambridgeshire, Hertfordshire and Norfolk sub-region. In particular, the proposed constituency of Cambridge and the name of the proposed Huntingdon and St Neots constituency were supported. Although there were some representations that, while welcoming the inclusion of St Neots in the constituency name, considered that the town of St Neots should be given greater prominence and be placed as the first name in the constituency. There was also considerable support for the inclusion of the Carpenders Park ward in the Watford constituency.
- 24. The inclusion of the four South Cambridgeshire wards in the cross-county Letchworth and Royston constituency continues to attract considerable opposition and virtually no support in the representations. The opposition and original counter-proposal of the South Cambridgeshire Member of Parliament, Heidi Allen (BCE-23985 and BCE-49050), is supported by campaigns (BCE-46922 containing 35 signatures and BCE-46523 containing five signatures) and by many individual representations, such as from Sylvia Armstrong (BCE-45863), Des Downey (BCE-43147) and Bryony Plock (BCE-46752) who encapsulates the sentiment of these representations: 'the life of our village is therefore determined much more by Cambridgeshire life than Hertfordshire life'.
- 25. In the initial proposals the Commission had not included the Meldreth ward in the Letchworth and Royston constituency, but a number of representations suggested that the ward had very close ties with the Melbourn ward and that the two wards should not be separated between constituencies. The assistant commissioners considered the issues in considerable detail, visited the all the

wards in guestion and also concluded that Meldreth did have very close ties with Melbourn. As they considered that the other three wards should be in the cross-county constituency, it followed that the Meldreth ward would also be included in the cross-county constituency. At the initial proposals stage, all three of the main political parties supported the Commission's proposals for the cross-county constituency, and this position has not changed, although the Liberal Democrat Party (BCE-51274) has now proposed a slightly different configuration of the South Cambridgeshire and South East Cambridgeshire constituencies. As was stated in the revised proposals report, if Heidi Allen's counter-proposal were to be accepted, a different configuration of sub-regions in the Eastern region would be required with only Suffolk as a stand-alone sub-region, and with considerable knock-on effects on constituencies throughout the rest of the Eastern region. It was also noted that although Ms Allen's counter-proposals attracted considerable support from members of the public in South Cambridgeshire, there was no support from anyone from the other constituencies that would be affected.

- 26. There was some objection to the 'return' of the Milton ward in the revised proposals to the South East Cambridgeshire constituency where it is currently located. In the initial proposals the ward had been included, as an 'orphan' ward, in the Cambridge constituency. This was supported at the time by a number of representations and it was argued that the ward was an integral part of the expansion of the city of Cambridge, containing, for example, the University of Cambridge Science Park. However, there was also opposition with a campaign against the initial proposals and this, and a visit by the assistant commissioners, led to the ward remaining in the South East Cambridgeshire constituency as part of the revised proposals. The representations received echo the comments made at the initial proposals and do not provide any significant new evidence. There was also some support for the inclusion of the Queen Edith ward in the Cambridge constituency, for example, Cllr Amanda Taylor (BCE-46186). The revised proposals mean that the Cambridge constituency is wholly coterminous with the local authority boundaries.
- 27. The initial proposals for the Peterborough constituency were mostly supported. However, a number of representatives have now been received objecting to the inclusion of City of Peterborough wards that lie south of the River Nene (in particular, the Orton Longueville and Orton Waterville wards) in the North West Cambridgeshire constituency, although these wards are in the existing constituency of North West Cambridgeshire. These representations suggest that these wards are no longer rural and are an integral part of Peterborough, for example, Cllr Andy Coles (BCE-41400), Ann Porter

(BCE-44958), and Fay Belham (BCE-44744), who suggests that the the Peterborough constituency should extend more to the west than to the east, thereby excluding fenland areas.

- 28. In the initial proposals there was very significant opposition to the inclusion of the Carpenders Park ward in the Hertsmere constituency. In an attempt to meet these objections, the assistant commissioners visited areas in and around Watford and concluded that the Watford Borough ward of Woodside should be included in the St Albans constituency, along with the Three Rivers District ward of Leavesden which is also currently included in the existing Watford constituency. To compensate for the inclusion of Carpenders Park in Watford, in the revised proposals the St Albans District ward of London Colney was included in the Hertsmere constituency. The inclusion of Carpenders Park in the Watford constituency in the revised proposals has been warmly welcomed with considerable support, for example from Bryan Jukes (BCE-43507), Peter Woodruff (BCE-43521) and Cllr Frances Button (BCE-47968) who said 'The strength of feeling on this in Carpenders Park has been exceptional, as evidenced by the substantial response including the Residents' Association's Petition that you received opposing your previous proposals'.
- 29. However, the consequential changes have not been supported elsewhere. Also, residents in the Leavesden ward have taken the opportunity at the revised proposals consultation to object to the inclusion of the ward in the St Albans constituency in the initial and revised proposals, for example, Ben Gray (BCE-47124) and the campaign (BCE-47924 containing 28 signatures). There have also been objections to the inclusion of the Abbots Langley and Bedmond ward, which it is suggested has close links with the Leavesden ward, also being included in the St Albans constituency (Gordon Gentry, BCE-45238), although it is noted that the Abbots Langley and Bedmond ward is currently located in the existing St Albans constituency.
- 30. Most of the objection has come from both the London Colney ward, for example Cathi Easter (BCE-47475) and Anne Main, Member of Parliament for St Albans (BCE-44297) who is concerned about London Colney being an 'orphan ward' that is 'attached to another constituency with which it has little demographic contiguity', and in particular, significant and substantial objection from the Woodside ward. A campaign (BCE-51952) opposed to the inclusion of the ward in the St Albans constituency has been received containing 97 signatures and 306 slips (but which do not contain the full details of the respondents) as well as a number of individual representations, for example, Tim Williams (BCE-43168), Ben West (BCE-43931), and Andrew Lang

(BCE-44788). Watford Borough Council (BCE-46042) and Watford Labour Party (BCE-51678) have submitted a counter-proposal which is the same as the initial proposals and the official Labour Party representation (BCE-51850). The Labour Party considers that the 'relatively minor inconvenience in respect of Carpenders Park [i.e. its inclusion in the Hertsmere constituency] cannot possibly justify the changes which the Commission propose'. A counter-proposal from Cllr Matthew Bedford (BCE-48018) and Sarah Bedford (BCE-50982), Leader of Three Rivers District Council 'returns' the Woodside ward to Watford and to compensate, splits the Three Rivers District ward of Gade Valley, which is in the proposed Hemel Hempstead constituency, by including the DAG polling district in the St Albans constituency.

- 31. The Liberal Democrat Party's counter-proposal (BCE-51274) makes changes to six of the constituencies in Hertfordshire. They support the inclusion of Carpenders Park and Woodside wards in the Watford constituency and London Colney ward in St Albans, and make further changes to the Broxbourne, Hertford and Stortford, Hertsmere, and Letchworth and Royston constituencies. The Conservative Party (BCE-51943) supports the revised proposals for this area.
- 32. Finally in Hertfordshire, there has been opposition to the inclusion of the East Hertfordshire District ward of Great Amwell in the Broxbourne constituency, for example, Larry Sovitch (BCE-49170), Anne Troughton (BCE-46270), and Great Amwell Parish Council (BCE-45558) which considers that the 'proposed parliamentary constituency covering the parish does not reflect any community of interest between its constituent areas'. It is noted that this ward has not changed constituencies between the initial and revised proposals and that no discernible opposition to the inclusion of the ward in the Broxbourne constituency was expressed during the initial proposals consultation.
- 33. Little by way of representations have been submitted in response to the revised proposals in Norfolk. However, there is some objection to the inclusion of the Briston ward in the Broadland constituency rather than in the North Norfolk constituency, for example James Cooper (BCE-44559), and Jennifer Taylor (BCE-48403) with most respondents saying that the ward has little in common with the Broadland constituency. However, it is noted that Norman Lamb, Member of Parliament for North Norfolk supported the inclusion of the ward of Aylsham in the North Norfolk constituency, and the Briston ward (albeit regrettably) in the Broadland constituency in his representation submitted during the initial consultation (BCE-23860).

- 34. Elsewhere in Norfolk, the other area that has generated some objection are the constituencies of Norwich North and Norwich South and the location of the New Costessey, Cringleford and Wensum wards. Chloe Smith, Member of Parliament for Norwich North (BCE-51631) has maintained the position she held in the initial proposals and opposes the inclusion of the Wensum ward in Norwich North saying that 'Wensum is not the appropriate ward to be included in Norwich North because the boundary between the two Norwich constituencies has long been held to be the River Wensum' and proposes that the Thorpe Hamlet ward would be a more suitable ward for inclusion in Norwich North. This exchange of ward is also proposed in the representation from the Conservative Party (BCE-51943), and is the only aspect of the revised proposals that the Conservative Party object to throughout the whole Eastern region.
- 35. The two East Cambridgeshire District wards of Littleport East and Littleport West are included in the cross-county South West Norfolk constituency in both the initial and revised proposals, and this did not generate much opposition at the initial proposals consultation with all three main political parties supporting the inclusion of the Littleport wards in the constituency. However, there has been some opposition to the inclusion of the two wards in the constituency at the revised proposals consultation. East Cambridgeshire District Council (BCE-51944) has submitted a counter-proposal which 'returns' the two wards to the North East Cambridgeshire constituency and includes the Roman Bank ward in the North West Norfolk constituency and Priority and West Winch wards in the Thetford and Downham Market constituency.

### Essex

- 36. The only major issue that drew objections in this sub-region was:
  - The continued inclusion of the Victoria and St. James wards of Castle Point Borough in the Southend West and Hadleigh constituency.
- 37. In response to the consultation the Commission received a counter-proposal in this sub-region. The counter-proposal received that did not divide wards:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
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Moreton, Bobbington and The Lavers Parish Council	Brentwood and Ongar, Harlow. Would not be valid the Harlow electorate would be 69,798.	No
---	--	----

- 38. Relatively few representations were received throughout Essex, whether in objection to or support for the revised proposals. All three main political parties support the revised proposals for the constituencies in Essex. There was some very limited support for the Castle Point and Southend West and Hadleigh constituencies, for example Nick Williams (BCE-49717), but most of representations regarding Castle Point were continued objections, although no new real evidence was presented and the objection was more muted than at the initial proposals.
- 39. There was some very limited opposition to the inclusion of the rural wards of Hastingwood, Matching and Sheering Village (James Barwick, BCE-44180) and Moreton and Fyfield being included in the Harlow constituency (Nick McEwen, BCE-48479), although Hastingwood, Matching and Sheering Village is located in the existing Harlow constituency. Michael Lager (BCE-48181) has suggested that the the Silver End & Cressing ward be split with just part of the AQ polling district included in Witham, rather than Braintree, to allow for part of an industrial area to be included in Witham rather than in the Braintree constituency.
- 40. The Commission has also received some support for its revised proposals in the Essex sub-region, namely the proposed constituencies of Saffron Walden, for example, Kemi Badenoch Member of Parliament (BCE-48357); Basildon, for example Colin Clarke (BCE-45878); and Brentwood and Ongar, and the inclusion of the Warley, and Ingrave, Herongate and West Horndon wards in the constituency, for example, Cllr Jill Hubbard (BCE-41401).
- 41. As stated previously, the counter-proposal for Essex submitted by Derek Jacobs (BCE-50250) was identical to that he proposed in the initial proposals.

# Suffolk

42. There was no major issue that drew objections in this sub-region.

43. In response to the consultation the Commission received a counter-proposal in this sub-region. The counter-proposal did not divide wards:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies/Ward(s) to be divided and reason	Similar counter-proposal received and considered at initial proposals?
Labour Party	BCE-51850	Ipswich, Central Suffolk and North Ipswich.	No

44. The Commission has received some support for its revised proposals in the Suffolk sub-region. In particular, there was considerable support for the inclusion of the Castle Hill ward in the Ipswich constituency, which is locally regarded as being part of Ipswich, for example Rosamund Fellows (BCE-45322) and John Carnall (BCE-45124). However, this support was not unanimous. The Labour Party (BCE-51850) consider that the Babergh District ward of Pinewood should be included in Ipswich as in the initial proposals, but that, if the Commission decide to continue to include the ward in the South Suffolk constituency, as in the revised proposals, then they consider that the Whitehouse ward, rather than Castle Hill, should be included in the Ipswich constituency.

# Counter-proposals that divided wards

45. As suggested above, some counter-proposals were received which suggested the dividing of wards between constituencies, these included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies/Ward(s) to be divided and reason	Similar counter-proposal received and considered at initial proposals?
Cllr Matthew Bedford, Three Rivers District Council	BCE-48018 BCE-50982	Watford, St Albans and Hemel Hempstead - Gade Valley ward (polling districts DAA and DAF in Hemel Hempstead and DAG in St Albans). DAG is the only part of the core of Abbots	No

		Langley not in the St Albans constituency. Also allows for the inclusion of Woodside ward in Watford.	
Michael Lager	BCE-48181	Braintree - Splits the AQ Polling district of the Silver End and Cressing ward.	No

### Alternative constituency names

46. As always, the naming of the proposed constituencies has proved to be a contentious issue. Many representations do not object to the proposed boundaries of constituencies, but suggest alternative names. Some responders, such as Edward Keene (BCE-42652), suggest a number of alternative names. Where alternative names result from changes proposed in the counter-proposals, these have not been listed below. Some of the alternative names suggested for constituencies for which no change in their composition is proposed are as follows:-

Proposed constituency name	Alternative names	Evidence for alternative name
North East Bedfordshire	North Bedfordshire	BCE-42652 (Edward Keene) - the constituency contains the whole of the northern edge of Bedfordshire. 'East' is therefore superfluous.
South West Bedfordshire	South Bedfordshire	BCE-42652 (Edward Keene) - the constituency contains most of the southern edge of Bedfordshire. 'West' is therefore superfluous.
Luton South	Luton South and Caddington	BCE-42652 (Edward Keene) - the principle of the nomenclature of Luton North and Houghton Regis should be extended to Luton South.
Thetford and Downham Market	South West Norfolk (as existing and initial proposals)	BCE-41908 (James Mather); BCE-43550 (Mark Holmes). Prefer existing name. Swaffham is similar in size as Downham Market and gives the impression that

		surrounding areas are relatively insignificant.	
Huntingdon and St Neots	St Neots and Huntingdon	BCE-46510 (Edward Hunt); BCE-47140 (Jim Yates) - St Neots is the largest town in the constituency.	
Huntingdon and St Neots	St Neots	BCE-44073 (Philip Cash) - St Neots is the largest town in the constituency.	
Huntingdon and St Neots	Huntingdon	BCE-45091 (Michael McMahon) - Huntingdon is the 'capital town of Huntingdonshire'.	
North West Cambridgeshire	North Huntingdonshire and West Nassaburgh, OR North Huntingdonshire	BCE-42652 (Edward Keene) - Nassaburgh is the name of an historic hundred in the north of the constituency. Also, the constituency includes none of the historic county of Cambridgeshire and most of the historic county of Huntingdonshire	
North West Norfolk	King's Lynn and West Norfolk	BCE-45678 (David Hopper) - constituency name should include the largest town.	
Broadland	Broadland and Fakenham	BCE-42652 (Edward Keene) only the eastern portion of the constituency includes the Broads.	
Letchworth and Royston	Hertsbridge, OR Hertscam, OR Herts and Cambs Borders, OR Icknield	BCE-50303 (Andrew Young - North East Hertfordshire Conservative Association. Various alternatives offered which they consider would be more appropriate.	
Broxbourne	Cheshunt and Hoddesdon	BCE-42652 (Edward Keene) - more compliant with the BCE's Policy B and the two largest towns in the constituency.	
Hertsmere	Bushey and Potter's Bar	BCE-42652 (Edward Keene) - the name of the district council is a 'fabrication from 1972 with no roots in history.' Although Borehamwood is the largest town	

		in the constituency, it does not have the same prominence or provenance of Bushey and Potter's Bar.
South West Hertfordshire	West Hertfordshire	BCE-42652 (Edward Keene) - the constituency contains the whole of the western edge of Hertfordshire. 'South' is therefore superfluous.
Basildon and East Thurrock	Basildon and Stanford	BCE-42652 (Edward Keene) - to comply with the BCE's Policy B, the name of the most prominent town, Stanford-le-Hope should be included in the constituency name.
Castle Point	Benfleet and Canvey Island	BCE-42652 (Edward Keene) - the castle in is Hadleigh (Southend West and Hadleigh). The constituency should be named after the two main population centres and not the local authority.
Southend West and Hadleigh	Leigh-on-Sea	BCE-43665 (Elizabeth Coates). As the constituency has a reasonably sized town at its centre, the constituency should be named after it.
Rochford and Southend East	Southend East and Rochford	BCE-42652 (Edward Keene) - to be named after the largest town, and constituency name inconsistent with Southend West and Hadleigh.
Saffron Walden	Saffron Walden and Dunmow	BCE-42652 (Edward Keene) - to reflect towns in the north and south of the constituency.
Central Suffolk and North Ipswich	Central Suffolk or Mid Suffolk	BCE-42652 (Edward Keene) - the vast majority of the area and population lie outside Ipswich's city (sic) limits.
Central Suffolk and North Ipswich	Central Suffolk	BCE-49023 (Michael Ager) - constituency 'doesn't really' include much of Ipswich.
Bury St Edmunds	Bury St Edmunds and Stowmarket	BCE-42652 (Edward Keene) - Bury is not so dominant as to

	exclude the second town of Stowmarket from the constituency name.
	name.

## How to view representations in the portal

47. Commissioners have been provided with login details that allow you to view all of the representations in the portal, download and view attachments.

BCE/2018/Paper 5 - Annex B



# **COMMISSIONERS' INFORMATION PACK**

# EAST MIDLANDS REGION

# FINAL RECOMMENDATIONS

# February 2018

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# Common national issues

1. We received over 35,000 representations across the country over the three consultation periods. Of these, approximately 10,700 were received in response to the consultation on the revised proposals. The spread of representations has not been even across the country. Representations received for each region are broken down in the table below. In addition, we have also received a number of petitions and writing campaigns during the final consultation. The total number of writing campaigns and petitions for each region is also provided in the table below.

Region	Consultation on revised proposals	Total representations	Total - petitions/ writing campaigns
East Midlands	421	2,048	6
Eastern	777	2,806	11
London	2,390	11,764	28
North East	540	1,968	7
North West	987	4,040	18
South East	2,511	5,438	26
South West	952	2,971	3
West Midlands	1,095	3,200	8
Yorkshire and the Humber	1,076	3,059	14
TOTAL	10,749	37,294	121

- In every region we have received representations that have not commented on specific boundaries, put forward alternatives or commented on names. These representations have largely focused on the following issues:
  - Opposition to the reduction in the number of MPs/constituencies
  - Opposition to having constituencies of equal size
  - Opposition to the use of the December 2015 electoral data
  - Opposition to using ward boundaries from May 2015
  - Concerns that the proposed boundaries reflect a political bias
  - Opposition to the proposals crossing county boundaries

- 3. We have not received regional-wide counter-proposals for every region in response to our revised proposals published in October 2017. In most cases, counter-proposals received during this consultation have been localised and focused on modifications to a small number of constituencies rather than across the entire region. These counter-proposals have been received from the central and local offices of the political parties, some politicians, and some individual members of the public. The central offices of the Conservative Party and Labour Party have made representations for all nine regions. The central offices for the other political parties did not submit a representation for each region, but in most cases the local offices have done so.
- 4. In some regions we have received counter-proposals that suggest dividing wards between constituencies. Details of these for this region are also provided later in this document.
- 5. Representations have also been received that comment only on the proposed names of constituencies. In some cases these have been localised comments; however, we have also received representations that have specifically commented on the Commission's approach to naming constituencies - i.e. length of name, cities/towns used in the constituency name and geographical context e.g. north/south.

# East Midlands regional information

#### Number of representations received

- 6. In the East Midlands, the Commission received a total of 421 representations during consultation on the revised proposals. In total the Commission received 2,048 representations for this region. There were also a number of duplicate representations within this total, as well representations that made general comments that did not have any bearing on the substance of the initial or revised proposals.
- 7. The Commission received representations from the following respondents:

Type of respondents	Consultation on revised proposals	Total number of representations
Member of Parliament	6	53
Official political party response	5	23
Peer from House of Lords	0	0
Local councillor	14	147
Local authority	10	31
Parish or town council	12	67
Other organisation	2	37
Member of the public	372	1,690
Total	421	2,048

### Campaigns

8. As expected, throughout the country, representations from a number of organised campaigns were received. In the East Midlands, one campaign was received, which was as follows:-

Campaign	ID Number	Support/ oppose initial proposals	Strength (no. of signatories)
Dale Abbey	BCE-51412	Oppose	147

Village campaign			
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- 9. In this instance, you will find one copy of the standard representation, together with a list of the names and addresses of those who either signed petitions, or submitted pro-forma letters.
- 10. During the previous consultations the Commission received five campaigns in relation to the East Midlands region. None of these campaigns were put forward again during the consultation on the revised proposals.

## Political party representations

- 11. Of the four main political parties, three have submitted responses, and there have been numerous counter-proposals from local branches of the political parties, some of which offer alternatives and variations to those submitted by the national representatives of their parties. The representation of the Conservative Party (BCE-51937) supported all 44 constituencies, including their suggested names, as put forward in the revised proposals report.
- 12. The Labour Party (BCE-51850) did not submit counter proposals for any constituencies, but suggested two alternative constituency names.
- 13. The Liberal Democrat Party (BCE-50966) supported 42 of the constituencies put forward in the revised proposals, and suggested minor alterations to the remaining constituencies.
- 14. No further representations from any respondents claiming to represent any other political parties were received.

### Sub-regions and counter-proposals that propose alternative sub-regions

- 15. The revised proposal were constructed on the sub-regions of:
  - Lincolnshire
  - Derbyshire and Derby
  - Leicestershire, Leicester, Northamptonshire, Nottinghamshire, Nottingham, and Rutland
- 16. The following counter-proposals have been received that cover either the whole region or a sub-region, and we recommend you take time to familiarise yourself with these representations:-

Organisation or Individual	ID Numbers	Affected sub-regions
Liberal Democrat Party	BCE-50966	Derbyshire and Derby
Alan Borgars	BCE-51681	Leicestershire, Leicester, Northamptonshire, Nottinghamshire, Nottingham, and Rutland
Ruth Hyde (Broxtowe Borough Council)	BCE-50137, BCE-35158	Leicestershire, Leicester, Northamptonshire, Nottinghamshire, Nottingham, and Rutland
James Strawbridge	BCE-49331	Leicestershire, Leicester, Northamptonshire, Nottinghamshire, Nottingham, and Rutland
Jonathan Stansby	BCE-42938	Leicestershire, Leicester, Northamptonshire, Nottinghamshire, Nottingham, and Rutland

- 17. As always, the naming of the proposed constituencies has proved to be a contentious issue. Many representations do not object to the proposed boundaries of constituencies, but suggest alternative names. Edward Keene (BCE-43477), suggests a number of alternative names in his representation.
- 18. The Commission did not receive any counter-proposals that proposed a different configuration of sub-regions.

# Detailed analysis of representations within sub-regions

### Lincolnshire

- 19. There were no issues that drew major objections in this sub-region. Some minor issues raised were:-
  - The inclusion of the Kirkby la Thorpe and South Kyme, and Heckington Rural wards in the proposed Boston and Skegness constituencies
  - The inclusion of the town of North Hykeham in the proposed Lincoln constituency

The Commission has received support for its revised proposals in the Lincolnshire sub-region, namely for the proposed Lincoln constituency. In response to the consultation the Commission did not receive any substantive counter-proposals for Lincolnshire.

# **Derbyshire and Derby**

- 20. The major issues that drew objections in this county were:-
  - Opposition to the inclusion of the village of Dale Abbey in the proposed Amber Valley constituency
  - Opposition to the inclusion of the town of Belper in the proposed Derbyshire Dales constituency
  - Opposition to the inclusion of the Allestree ward in the proposed Amber Valley constituency
- 21. In response to the consultation the Commission received one counter-proposal in this sub-region, which is identified below Some counter-proposals suggested the splitting of wards between constituencies, these are detailed later in this section. The counter-proposal received that did not divide wards is below:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Liberal Democrat Party	BCE-50966	Amber Valley, Bolsover, Derbyshire Dales	Yes - re-affirmation of Liberal Democrat proposals put forward in initial consultation period

22. In response to the Commission's revised proposals for the Amber Valley constituency, the Commission received a petition with 147 signatories, objections to the Dale Abbey parish being included within the constituency, and expressing a wish to instead be included in the Erewash constituency. The author of the petition cited close links with the Erewash constituency, stating that 'socially, culturally, and historically Dale Abbey has strong links to

Stanton by Dale and Ilkeston', both of which are part of the Erewash constituency. The petition implicitly suggests the division of the West Hallam & Dale Abbey wards, as it states 'There are just 266 of us; our inclusion in Erewash will not have a significant impact on the size of either constituency'.

- 23. Objections to the Derbyshire Dales constituency focused on the inclusion of the town of Belper in the constituency, with some respondents, such as the Liberal Democrat Party (BCE-50966), and Heanor and Loscoe Town Council (BCE-50134) arguing that Belper would more appropriately be situated in a Derbyshire Dales constituency. The Liberal Democrat party also argued that their proposal as submitted in the initial proposals consultation, which consequently placed the Allestree ward into the Amber Valley constituency. allowed for the inclusion of all four wards which make up the Alfreton and Somercotes County Division (Alfreton, Ironville & Riddings, Somercotes, and Swanwick) to remain united in one constituency. In their representation, they acknowledge that the arguments are very finely balanced, and ask that the Commission reconsider their proposal, or otherwise consider including the Swanwick ward in the Amber Valley constituency, to 'avoid a poor boundary between Ironville & Riddings and Somercotes'. Several comments from individuals also expressed their disappointment that the Allestree ward was included in the Amber Valley constituency rather than Derbyshire Dales, and considered that both Allestree and Duffield to have stronger links to that constituency, and believed that Ripley and Heanor had superior inks to Amber Valley.
- 24. Elsewhere in the county, the Commission received support for many of its proposed constituencies, including the North East Derbyshire constituency, which is coterminous with the local authority of the same name, and its Derby West and Derby East constituencies, which underwent minor modifications from the initial proposals in order to unite the community of Chaddesden in one constituency.
- 25. The campaign submitted in objection to the Commission's proposals to include the village of Dale Abbey (contained in the West Hallam & Dale Abbey ward) implicitly proposes a division within the ward, so that electors from the village can be placed within the Erewash constituency. Details of this representation is detailed later in the document.

### Nottinghamshire

26. The major issues that drew objections in this county were:-

- The inclusion of the Nottingham City wards of Clifton North and Clifton South in the proposed Rushcliffe constituency
- Opposition to the proposed cross-county Loughborough and South Rushcliffe constituency
- Opposition to the division of Chilwell between the proposed Nottingham South and Beeston, and Broxtowe and Hucknall constituencies
- 27. In response to the consultation the Commission received a number of counter-proposals in this county. No counter-proposals were received that suggested any division of wards in Nottinghamshire

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Alan Borgars	BCE-51681	Nottingham East and Carlton, Nottingham North, Nottingham South and Beeston, Broxtowe and Hucknall, Ashfield, Sherwood, Newark. North Rushcliffe, Loughborough and South Rushcliffe	No
Ruth Hyde (Broxtowe Borough Council)	BCE-50137, BCE-35158	All constituencies in Nottinghamshire with the exception of Loughborough and South Rushcliffe and Mansfield	Yes, re-affirmation of initial proposals submission
James Strawbridge	BCE-49331	Sherwood, Newark, Nottingham East and Carlton, North Rushcliffe	No
Liberal Democrat Party	BCE-50966	Sherwood, Nottingham East	No

and Carlton	
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- 28. The decision of the Commission to continue to recommend that the Clifton North and Clifton South wards be included in a constituency with wards from Rushcliffe Borough continues to be contentious, with many respondents considering the Clifton area to have no links with the remainder of the proposed constituency, as well as being fundamentally different in character. The counter-proposal of Alan Borgars (BCE-51681) concurs with this view and instead includes the two wards in a Nottingham South and Beeston constituency, as part of a arrangement that reconfigures much of Nottinghamshire.
- 29. In previous consultation stages, respondents had expressed their disappointment that the Nottingham City ward of Bilborough had been included in a Broxtowe and Hucknall constituency, with many feeling that the ward should be situated in a constituency primarily based within the city. In order to facilitate the transfer of this ward to the Nottingham South and Beeston constituency, Commissioners recommended that the Toton & Chilwell Meadows, and Chilwell West wards be transferred to the Broxtowe and Hucknall constituency. The resulting division of Chilwell has been met with opposition from respondents within the area. In their representation, Broxtowe Borough Council (BCE-50137) concurred with this view stating that any proposal which separates any part of Attenborough, Chilwell, and Toton, will no doubt have negative implications for community spirit, identity and representation.' They go on to further recommend that the Commission reconsider their counter-proposal as submitted in the initial proposals consultation, which re-configures many of the constituencies in Nottinghamshire. The Liberal Democrat Party (BCE-50966) also opposed this proposal in the submission to the initial proposals consultation, but did not make reference to the area in their submission to the revised proposals consultation.
- 30. The Liberal Democrat Party did however, suggest a minor change the the Commission's proposed Sherwood and Nottingham East and Carlton constituencies. They considered that the Trent Valley ward had become 'inaccessible from the rest of the constituency' due to the transfer of the Dover Beck and Lowdham constituency, and suggested the 'simplest' way of resolving the problem would be to transfer the Trent Valley ward from the Sherwood constituency to Nottingham East and Carlton.

- 31. In his representation, James Strawbridge (BCE-49331) agreed with the Commission's decision to include Clipstone and Edwinstowe in the same constituency Ollerton, but considered it 'preferable' to have the suburbs of Arnold separate from them. In his proposal, which configures the Sherwood, Newark, Nottingham East and Carlton, and North Rushcliffe constituencies, he instead suggests an Arnold and Southwell constituency.
- 32. Elsewhere in Nottinghamshire, the Commission received support for its decision to transfer the East Bridgford ward to the Newark constituency, as suggested by many representations.
- 33. As in previous stages of the consultation, several respondents have opposed the cross-county constituency of Loughborough and South Rushcliffe, considering the two areas to have little connection.

### Leicestershire

- 34. The major issue that drew objections in this county was:-
  - Opposition to the proposed cross-county Daventry and Lutterworth constituency
- 35. In response to the consultation the Commission received one counter-proposal in this county.

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Jonathan Stansby	BCE-42938	Charnwood, South Leicestershire, Rutland and Melton, Harborough, Daventry and Lutterworth.	YesNorth

36. The Commission has received support for its revised proposals in the Leicestershire sub-region, in particular the proposed constituencies of North West Leicestershire, and Charnwood. Improvements to the cross-county Loughborough and South Rushcliffe constituency were noted by several respondents, but several others disagreed with the principle of a cross-county constituency, considering the two areas to be disparate in nature. Similarly, the cross county constituency of Daventry and Lutterworth was met with widespread opposition, which focused on the lack of community links within the constituency. The proposal of Jonathan Stansby (BCE-42938), which is similar to the proposal he submitted to the initial proposals consultation, reconfigures several constituencies, allowing the Rutland and Melton constituency to remain unchanged, and resulting in the creation of two new constituencies to replace the proposed South Leicestershire and Harborough constituencies (Blaby, and Wigston and Lutterworth), and combines the market town of Harborough with Daventry.

### Northamptonshire

- 37. The major issues that drew objections in this county were:-
  - Opposition to the exclusion of the Finedon ward from the proposed Wellingborough constituency
  - Opposition to the proposed cross-county Daventry and Lutterworth constituency
  - Opposition to the inclusion of the Harrowden & Sywell, and Earls Barton wards in the proposed Daventry and Lutterworth constituency
- 38. In response to the consultation, the Commission did not receive any substantive counter proposals for the county of Northamptonshire, aside from the counter-proposal mentioned above from Jonathan Stansby (BCE-42938) which included the towns of Harborough and Daventry a constituency which crossed the county boundary between Leicestershire and Northamptonshire.
- 39. The Commission's proposed Wellingborough constituency continues to receive strong opposition, with a number of respondents within the Finedon ward, which is proposed to be transferred to Kettering, expressing a view that they should remain in the constituency. Similarly, a number of respondents from the Harrowden and Sywell ward (which is currently divided between constituencies), such as those from the village of Isham and the hamlet of Hardwick are opposed to being transferred from Wellingborough to Daventry and Lutterworth, citing their lack of links to other areas in the proposed constituency, in contrast with their close proximity to Wellingborough. Respondents residing in the Earls Barton ward, which is currently in the Daventry constituency, expressed much the same views.

40. The Commission has also received support for its revised proposals in Northamptonshire, namely the proposed configuration and naming of constituency of Corby and East Northamptonshire.

#### Counter-proposals - that divided wards

41. As suggested above, some counter-proposals were received which suggested the dividing of wards between constituencies, these included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Ward(s) to be divided and reason
Robert Hulls	BCE-51412	Amber Valley, Erewash	West Hallam & Dale Abbey; The remainder of the Dale Abbey parish is contained in the Erewash constituency, and services such as GPs and schools are in also in this constituency.

#### Alternative constituency names

42. As always, the naming of the proposed constituencies has proved to be a contentious issue. Many representations do not object to the proposed boundaries of constituencies, but suggest alternative names. Some responders, such as Edward Keene (BCE-43477), suggest a number of alternative names. Where alternative names result from changes proposed in the counter-proposals, these have not been listed below. Some of the alternative names suggested for constituencies for which no change in their composition is proposed are as follows:-

Proposed constituency name	Alternative names	Evidence for alternative name
Lincoln	Lincoln and North Hykeham/ North Hykeham and Lincoln	(BCE-51470) None provided

Sleaford	Sleaford and Cranwell	(BCE-42101) None provided
High Peak	Buxton and Glossop, North Derbyshire and Tintwistle	(BCE-43477) Constituency should be named using major population centres
Derbyshire Dales	Ashbourne and Bakewell, West Derbyshire	(BCE-43477) Constituency should be named using major population centres
Amber Valley	Heanor and Amber Valley	(BCE-43477) Major population centre added to constituency name
Erewash	Long Eaton and Ilkeston, South-East Derbyshire	(BCE-43477) Constituency should be named using major population centres
Broxtowe and Hucknall	Nottingham West	BCE-42272 None provided
Broxtowe and Hucknall	Broxtowe	(BCE-43477) Unnecessary to distinguish Hucknall in constituency title
North Rushcliffe	West Bridgford	(BCE-43254) Better suits proposed boundaries
North Rushcliffe	West Bridgford and Clifton	(BCE-51580) Recognises the names of the two most populous settlements
Nottingham South and Beeston	Nottingham West and Beeston	(BCE-43254) Better suits proposed boundaries
Nottingham South and Beeston	Nottingham West	(BCE-43477) Given the loss of Clifton and the addition of Bilborough to the constituency 'West' is the correct compass point designation. 'Little rationale' for distinguishing Beeston over other areas such as

		Bilborough, Wollaton, and Dunkirk
Nottingham East and Carlton	Nottingham East and Mapperley	(BCE-46794) Mapperley should be represented in constituency name
Nottingham East and Carlton	Nottingham East	(BCE-43477) There is 'little rationale' for distinguishing Carlton over other areas not named in the title such as Colwick, Gedling, and Porchester
Harborough	Oadby, Wigston, and Harborough, Harborough, Oadby and Wigston	(BCE-42973, BCE-50799) The MP refers to the constituency as Oadby, Wigston, and Harborough. Most of electorate for constituency will be within Oadby and Wigston Borough,
		(BCE-43477) Major population centres included in constituency name
Charnwood	Mid Leicestershire	(BCE-48183) To prevent confusion with Charnwood Borough, which provides services to multiple constituencies (BCE-43477) Most appropriate name in the absence of any dominant
Bosworth	Hinckley and Bosworth	population centre (BCE-44638) Hinckley and Bosworth is a more suitable name
Bosworth	Hinckley, Hinckley and Bosworth, West Guthlaxton	(BCE-43477) Hinckley is the major population centre of the constituency. West

		Guthlaxton is the historic wapentake that the western section of the constituency occupies
Loughborough and South Rushcliffe	Loughborough and Leake	(BCE-51681) None provided
Loughborough and South Rushcliffe	Loughborough and Keyworth	(BCE-51580) Loughborough and South Rushcliffe is an 'awkward' name
South Northamptonshire	Brackley and Towcester	(BCE-5153) None provided
Wellingborough	Wellingborough and Rushden	BCE-48443 BCE-43477 Rushden is a significant population centre

#### How to view representations in the portal

43. Commissioners have been provided with login details that allow you to view all of the representations in the portal, download and view attachments.

BCE/2018/Paper 5 - Annex C



# **COMMISSIONERS' INFORMATION PACK**

# LONDON REGION

# FINAL RECOMMENDATIONS

# February 2018

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### Common national issues

1. We received over 35,000 representations across the country over the three consultation periods. Of these, approximately 10,700 were received in response to the consultation on the revised proposals. The spread of representations has not been even across the country. Representations received for each region are broken down in the table below. In addition, we have also received a number of petitions and writing campaigns during the final consultation. The total number of writing campaigns and petitions for each region is also provided in the table below.

Region	Consultation on revised proposals	Total representations	Total - petitions/ writing campaigns
East Midlands	421	2,048	6
Eastern	777	2,806	11
London	2,390	11,764	28
North East	540	1,968	7
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South West	952	2,971	3
West Midlands	1,095	3,200	8
Yorkshire and the Humber	1,076	3,059	14
TOTAL	10,749	37,294	121

- In every region we have received representations that have not commented on specific boundaries, put forward alternatives or commented on names. These representations have largely focused on the following issues:
  - Opposition to the reduction in the number of MPs/constituencies
  - Opposition to having constituencies of equal size
  - Opposition to the use of the December 2015 electoral data
  - Opposition to using ward boundaries from May 2015
  - Concerns that the proposed boundaries reflect a political bias
  - Opposition to the proposals crossing county boundaries

- 3. We have not received any regional-wide counter-proposals to our revised proposals published in 2017. In most cases, counter-proposals received during this consultation have been localised and focused on modifications to small numbers of constituencies rather than across the entire region. These counter-proposals have generally been received from the central and local offices of the political parties, some politicians, and some individual members of the public. The central offices of the Conservative Party, Labour Party and the Liberal Democrat Party have made representations for the London region. The central offices for the other political parties did not submit a representation for this region, but in most cases the local offices have done so.
- 4. In some regions we have received counter-proposals that suggest dividing wards between constituencies. Details of these for this region are provided later in this document.
- 5. Representations have also been received that comment only on the proposed names of constituencies. In some cases these have been localised comments; however, we have also received representations that have specifically commented on the Commission's approach to naming constituencies - i.e. length of name, cities/towns used in the constituency name and geographical context e.g. north/south.

## London regional information

#### Number of representations received

6. In London, the Commission received a total of 2,390 representations during consultation on the revised proposals. In total the Commission received 11,764 representations for this region. There were also a number of duplicate representations within this total, as well as representations that made general comments that did not have any bearing on the substance of the initial or revised proposals.

Type of respondents	Consultation on revised proposals	Total number of representations
Member of Parliament	19	132
Official political party response	4	28
Peer from House of Lords	1	7
Local councillor	63	521
Local authority	8	57
Parish or town council	0	6
Other organisation	44	258
Member of the public	2,251	10,755
Total	2,390	11,764

7. The Commission received representations from the following respondents:

## <u>Campaigns</u>

8. As expected, throughout the region, representations from a number of organised campaigns were received. In London, these were as follows:-

Campaign	ID Number	Support/ oppose revised proposals	Strength (no. of signatories)
Boundary between	BCE-48735	Oppose	27

proposed Camberwell & Peckham & Dulwich and Sydenham constituencies			
Annexation of Wimbledon Village to unite with Putney	BCE-51911	Support	27
Opposition to changes in North Harrow	BCE-48770	Oppose	4
Change Tooting to Balham and Tooting or Tooting and Balham	BCE-46189	Support	15
Hammersmith and Shepherds Bush belong together	BCE-46622	Oppose	23

- 9. In each of these instances, you will find one copy of the standard representation, together with a list of the names and addresses of those who either signed petitions, or submitted pro-forma letters.
- 10. During the previous consultations the Commission received 23 campaigns in relation to London. Of these, the campaign titled Hammersmith and Shepherds Bush belong together (BCE-46622) is similar to the campaign received during an earlier consultation, which was titled Shepherds Bush united in a single constituency (BCE-29011).

#### Political party representations

11. Of the four main political parties, three of the central offices have submitted responses. In addition, there have been a few counter-proposals from local branches of the political parties, some of which offer alternatives and variations to those submitted by the national representatives of their parties. Although the Conservative Party (BCE-51899) have maintained their position throughout, the Liberal Democrats (BCE-51271) have submitted a counter-proposal which proposes Oakleigh ward be split in the LB of Barnet as an alternative to the Brunswick Park ward split in the revised proposals. In their response to the revised proposals, the Labour Party's (BCE-51850) have slightly modified their position to support the submission of Joseph Renny (BCE-51752) who proposes the splitting of Heathfield ward between Croydon South East and Croydon South West.

#### Sub-regions and counter-proposals that propose alternative sub-regions

- 12. The revised proposals were constructed on the sub-regions of:
  - North Thames
  - South Thames
- 13. During consultation on the revised proposals, we have not received counter-proposals which were based on alternative sub-regions.

#### Detailed analysis of representations within sub-regions

#### **North Thames**

- 14. The major issues that drew objections in this sub-region were:-
  - Opposition to the revised Dagenham and Rainham, and Romford constituencies
  - There continues to be opposition to the revised Finchley and Enfield Southgate constituency
  - We received some opposition to the proposed constituencies in the LB of Harrow and LB of Hillingdon.
  - Opposition to the proposed constituencies of Hillingdon and Uxbridge, Hayes and Harlington, Ruislip, Northwood and Pinner, Harrow North, Harrow South and Kenton, and Ealing North
  - The proposal for a near coterminous Hammersmith constituency and the inclusion of four Shepherds Bush wards in a Willesden constituency has received substantial opposition
- 15. In response to the consultation the Commission received a number of counter-proposals in the North Thames sub-region. Some counter-proposals suggested the splitting of wards between constituencies, these are detailed later in this section. The counter-proposals received that did not divide wards included:

Organisation or	ID Numbers	Affected revised	Similar
Individual		proposal constituencies	counter-proposal received and considered at the initial proposals?
Howard Erdunast	BCE-44763	Greenford and Sudbury, and	No

		Wembley	
Andy Slaughter MP	BCE-47233	Hammersmith,	Yes
		Willesden and	
		Shepherds Bush,	
		Kensington and	
		Chelsea, Cities of	
		London and	
		Westminster. This	
		counter-proposal	
		supports the Labour	
		Party (BCE-33244)	
		IP	
Zak Wagman	BCE-49109	Harrow North,	No
		Harrow South and	
		Kenton, Ruislip	
		Northwood and	
		Pinner. This	
		counter-proposal	
		takes the Ruislip,	
		Northwood and	
		Pinner constituency	
		outside the	
		electoral range.	
		This	
		counter-proposal	
		supports David	
		Ashton	
		(BCE-48770)	
David Ashton	BCE-48770	Harrow North,	No
		Harrow South and	
		Kenton, Ruislip	
		Northwood and	
		Pinner. This	
		counter-proposal	
		takes the Ruislip	
		Northwood and	
		Pinner constituency	
		outside the	
		electoral range.	
		This	
		counter-proposal	
		supports Zak	

		Wagman	
		(BCE-49109)	
LB Hillingdon	BCE-49300	Harrow North,	Yes
	DCE-49300	Harrow South and	165
		Kenton, Ruislip	
		Northwood and	
		Pinner.This counter	
		proposal lacks clear	
		instructions	
		regarding the	
		moving of wards to	
		Harrow North	
		constituency	
Boris Johnson MP	BCE-50246	Harrow North,	No
	DCL-30240	Harrow South and	
		Kenton, Uxbridge.	
		This	
		counter-proposal	
		has been submitted	
		by the Conservative	
		Party and Bob	
		Blackman MP	
		(Harrow East)	
John Bryant	BCE-50942	Finchley and	No
		Enfield Southgate,	
		and Chipping	
		Barnet	
Cllr Krishna Suresh	BCE-51698	Harrow North, and	No
		Harrow South and	
		Kenton	
Cllr Graham	BCE-51699	Harrow North, and	No
Henson		Harrow South and	
		Kenton	
Kantial Mistry	BCE-51741	Harrow North,	No
		Harrow South and	
		Kenton, Ruislip	
		Northwood and	
		Pinner. This	
		counter-proposal	
		takes all three	
		constituencies	
		001131110101010	

		outside the	
		electoral range.	
Conconvotivo Dortv		Harrow North,	Yes
Conservative Party	BCE-51899		165
		Harrow South and	
		Kenton, Uxbridge.	
		This	
		counter-proposal	
		has been is	
		supported by Boris	
		Johnson MP and	
		Bob Blackman MP	
		(Harrow East)	
Adrian Bailey	BCE-51902	Enfield North	No
		Finchley and	
		Enfield Southgate,	
		Hendon, Hornsey	
		and Wood Green,	
		Tottenham,	
		Chipping Barnet.	
		These two counter	
		proposals would	
		return Stroud Green	
		ward to a	
		Tottenham	
		constituency which	
		has been the	
		subject of much	
		opposition in the	
		IPs.	
		IF 5.	

16. In response to the revised proposals the Commission has received opposition to the proposed Dagenham and Rainham, and Romford constituencies. Both constituencies were modified in formulating the revised proposals. In response to the recent consultation, the proposal to split Eastbrook ward (Rush Green polling district MA) has been re-submitted by the two constituency MPs Andrew Rosindell and Jon Cruddas, and also supported by Roger Ramsey - leader of Romford Council. However, it should be noted that the Conservative Party (BCE-51899) supports the Commission in not undertaking this split ward proposal as the benefits are local to the constituencies concerned and an 'orphan polling district' would be created in the LB of Havering. In the initial proposals Cllr Mick McCarthy (BCE-18218) suggested an alternative counter-proposal that Elm Park ward be included in

the Romford constituency. However, this would result in the constituency being out of the electoral range.

- 17. In response to the initial proposals, the Commission received opposition to its proposed Enfield constituencies. In formulating the revised proposals, the assistant commissioners considered alternatives and visited the area. They proposed that the Cockfosters ward be included in a Finchley and Enfield Southgate constituency and that the Brunswick Park ward be divided between constituencies.
- 18. There continues to be opposition to the revised Finchley and Enfield Southgate constituency. There is now fresh opposition to the area of Palmers Green being divided across two constituencies (Edmonton, and Finchley and Enfield Southgate). The Save Our Southgate campaigner David Conway (BCE-50388) has submitted a counter-proposal which asks the Commission to reconsider the proposal submitted by the former MP David Burrowes (BCE-29278), which retained the existing Enfield Southgate constituency with the addition of Bush Hill Park ward from the existing Edmonton constituency. Mr Conway suggested an alternative solution to split Grange ward (polling district YJB) but details regarding the knock-on effects to adjacent constituencies are not considered.
- 19. The Liberal Democrats (BCE-51271) have submitted a counter-proposal that splits Oakleigh ward (polling district CED). This configuration will keep the four Finchley wards together in a proposed Southgate and East Barnet constituency while Cockfosters ward is retained in an Enfield Southgate constituency. The remaining three polling districts are paired with the four Finchley wards to make a newly proposed Chipping Barnet and Finchley constituency that is also wholly within the LB of Barnet.
- 20. In the boroughs of Barnet and Enfield, John Bryant (BCE-50942) submitted a counter-proposal that returned Cockfosters ward to a Chipping Barnet constituency a move that had proved unpopular in previous consultations though it did not involve the dividing of Brunswick Park ward. However, under this proposal the four wards in Finchley were retained together in the Finchley and Enfield Southgate constituency. To the south of Enfield, Adrian Bailey (BCE-51902) proposed that Stroud Green ward be included in the proposed Tottenham constituency. This has previously been objected to in previous consultations and does also not involve the dividing of Brunswick Park ward.

- 21. We received some opposition to the proposed constituencies in the LB of Harrow and LB of Hillingdon. However, many respondents acknowledged that the revised proposals were an improvement on the initial proposals.
- 22. The North Thames sub-region received several counter-proposals for the proposed constituencies of Harrow North, Harrow South and Kenton, Ruislip, Northwood and Pinner, and Ealing North. It has been acknowledged that the revised proposal are a significant improvement on the initial proposals and that the concerns of the community have been addressed.
- 23. The Conservative Party (BCE-51899), Bob Blackman MP (BCE-49958) and Boris Johnson MP (BCE-50256) suggested that the West Ruislip ward be moved to the proposed Hillingdon and Uxbridge constituency, and that the lckenham, Northolt West End, and Northolt Mandeville wards be moved to the proposed Hillingdon and Uxbridge constituency. Harrow Weald, Headstone North, and Headstone South are proposed to be added to the Ruislip Northwood and Pinner constituency, while the Marlborough North and Wealdstone wards are transferred to the Harrow South and Kenton constituency. Finally, the Edgware, Kenton, Kenton East, Kenton West, and the two Queensbury wards are proposed to be added to the Harrow North constituency. This counter-proposal returns the Ealing North constituency to its existing configuration.
- 24. We also received counter-proposals from Cllr Graham Henson (BCE-51699) and Cllr Krishna Suresh (BCE-51698) who support the revised proposals but offer minor changes in the Harrow North, and Harrow South and Kenton constituencies which according to Cllr Henson would keep 'South Harrow together'. Howard Erdunast (BCE-44763) also supports the proposals in this area and similarly suggests a one ward swap of the Northwick Park ward to the proposed Wembley constituency, and Alperton ward to the proposed Greenford and Sudbury constituency.
- 25. In response to the consultation on the initial proposals opposition was received to the proposed Hammersmith and Fulham, and Ealing Central and Shepherd's Bush constituencies. Respondents opposed the proposal to divide the areas of Hammersmith and Shepherd's Bush between constituencies. The assistant commissioners considered the counter-proposals for this area and noted that they resulted in consequential changes to neighbouring constituencies and that support had been received for some of these neighbouring constituencies. The revised proposals did not modify the proposed Hammersmith and Fulham constituency and suggested the inclusion of four Shepherds Bush wards in a Willesden constituency. These

proposals have again been objected to. Andy Slaughter MP (Hammersmith) (BCE-47233) and some 600 members of the public have opposed this pattern of constituencies. Similar counter-proposals have been received which would include the area of Fulham with Chelsea in a constituency and the areas of Hammersmith and Shepherd's Bush in a constituency.

26. The Commission has also received some support for its revised proposals in the North Thames sub-region. Namely the proposed constituencies of Kensington and Chelsea, Camden and St Pancras, Hampstead, Hornsey and Wood Green, Tottenham, Chipping Barnet, Ilford North and Wanstead, Ilford South, Leyton and Stratford, Walthamstow, and Chingford and Woodford.

#### South Thames

- 27. The major issues that drew objections in this sub-region were:-
  - Opposition to the proposal to include the Belmont ward in a Carshalton and Wallington constituency.
  - While there has been support for the revised Wimbledon constituency, there has been some opposition to the inclusion of the Roehampton and Putney Heath ward in the constituency.
  - There continues to be opposition to the proposed Bexley and Sidcup, and Erith and Crayford constituencies.
- 28. In response to the consultation the Commission received a number of counter-proposals in the South Thames sub-region. Some counter-proposals suggested the splitting of wards between constituencies, these are detailed later in this section. The counter-proposals received that did not divide wards included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at the initial proposals?
Simon Partlett	BCE-51194	Croydon South East, Croydon South West	No
Simon Partlett	BCE-51224	Dulwich and Sydenham,	No
Rebecca Jewell	BCE-41405	Eltham and Welling Crayford and Erith,	No

<b>F</b>		Deviles and Old	1
		Bexley and Old	
		Sidcup. This	
		counter-proposal	
		takes Eltham and	
		Welling	
		constituency out of	
		electoral range	
Frazer Brooks	BCE-49259	Erith and Crayford,	No
		Bexley and Sidcup,	
		Eltham and Welling.	
		These	
		counter-proposals	
		allocate East	
		Wickham and	
		Falconwood and	
		Welling wards into	
		the Erith and	
		Crayford	
		constituency taking	
		it out of the	
		electoral range.	
Conservative Party	BCE-51899	Bexley and Sidcup,	Yes
		Erith and Crayford	
Jeremy Fitzpatrick	BCE-51081	Croydon South	No
		East Croydon	
		South West	
		Fieldway and New	
		Addington wards	
		not connected to	
		the Croydon South	
		West constituency.	
		· · · ·	

- 29. In the initial proposals, the Commission suggested constituencies of Carshalton and Wallington, and Sutton and Cheam. In response to the consultation on the initial proposals, the Commission received opposition to the inclusion of the Belmont ward in the Carshalton and Wallington constituency. After considering the evidence, assistant commissioners recommended the same pattern of constituencies as part of the revised proposals.
- 30. There continues to be opposition to the Belmont ward being included in a Carshalton and Wallington constituency. Respondents argue that the Belmont

ward should be included in the Sutton and Cheam constituency. The Belmont and Cheam Residents Association (BCE-51560), supported by Steven Roberts (BCE-51315) and many residents proposed this modification. Mr Roberts states 'Following a recent review by the Post Office, a significant part of the Belmont ward is now considered by the Post Office to have a Cheam postal address. This proposal would split this part of Cheam into two. The local Residents Association has done much to create a local community comprising Belmont and South Cheam and this proposal would tear that apart. A real kick in the teeth for Localism. We have a very distinct community and many residents of South Cheam use the shops and public transport facilities of Belmont. We would not want to see this community split across two constituencies and hence two MPs'. During consultation on the initial proposals, some support was received for the inclusion of Belmont ward in the Carshalton and Wallington constituency, for example Myfanwy Wallace (BCE-27217).

- 31. While there has been support for the revised Wimbledon constituency, there has been some opposition to the inclusion of the Roehampton and Putney Heath ward in the constituency. The Putney Society (BCE-47142) submitted a counter-proposal that split Earlsfield ward using the railway line as a boundary. The northern half of the ward would be included in the Wandsworth and Putney constituency and the southern half of the ward would be placed in the Wimbledon constituency. This would enable the Roehampton and Putney Heath ward to remain in the Wandsworth and Putney constituency. It should be noted that this counter-proposal has not been submitted previously.
- 32. There continues to be opposition to the proposed Bexley and Sidcup, and Erith and Crayford constituencies. Several counter-proposals were received for the LB of Bexley constituencies of Bexley and Sidcup, and Erith and Crayford. Some were invalid as they failed to take into account the knock-on effects of returning these constituencies to their existing configuration. Furthermore, some counter-proposals did not consider the impact this pattern would have on the neighbouring Eltham and Welling constituency which, as a consequence, would be outside the electoral range.
- 33. The Conservative Party (BCE-51899), Simon Windle (BCE-47722), and the Bexleyheath and Crayford Conservative Association (BCE-50062) submitted the same counter-proposal which moved Danson Park and Christchurch wards to the Erith and Crayford constituency, and Crayford and North End wards into the Bexley and Sidcup constituency. They further suggest moving the Falconwood and Welling, and East Wickham wards to the proposed Eltham and Welling constituency. This would enable the St. Michael's ward to

remain in a Bexley constituency. Mr Windle submits 'this alternative would also maintain the historic Crayford Urban District Council area of Crayford, North End and Barnehurst' (abolished in 1965). It has been suggested that if these changes were to be adopted, a name change to Bexleyheath and Erith, and Bexley, Crayford and Sidcup would be suitable.

- 34. Cllr David Leaf (BCE-51910) has re-submitted a counter-proposal which divides polling district LA1E of Lesnes Abbey ward. The Commission had not previously supported this ward split as it was presented as a local issue to allow the unification of the Thamesmead Estate, Conservative Party (BCE-51899) page 25 para 3.34.
- 35. In the revised proposals the Commission proposed alternative constituencies in the LB of Croydon. After considering evidence in relation to the area of Shirley and neighbouring constituencies, the revised proposals were for constituencies of Croydon South East, Croydon South West, and Norwood and Thornton Heath. Not all of these constituencies have been supported in response to the consultation and some counter-proposals have been received. The Labour Party (BCE-51850) proposed the splitting of Heathfield ward between the existing constituencies of Croydon Central and Croydon South. Joseph Renny (BCE-51752) submitted a similar counter-proposal which split the Heathfield ward by transferring polling districts HE5 and HE6 to the proposed Croydon South West constituency.
- 36. Simon Partlett (BCE-51194) proposed the moving of whole wards between these two constituencies and changes to the proposed Norwood and Thornton Heath, and Mitcham and Norbury constituencies. The latter constituency had been divided across five constituencies in the initial proposals. Siobhain McDonagh, MP for Mitcham and Morden (BCE-51906), stated 'I am delighted to see the Boundary Commission has taken into account the views of the residents of Mitcham whose response to the previous review was to overwhelmingly call for the 6 wards of Mitcham to be retained as one community'. However, Ms McDonagh continues to appeal for all Merton wards to be reinstated to their existing position.
- 37. The Commission has also received varying degrees of support for its revised proposals in the South Thames sub-region. Namely the proposed constituencies of Richmond Park, Kingston and Surbiton, Lewisham West and Penge, Streatham, Wimbledon, Mitcham and Norbury, and Tooting. Many respondents who support the proposed Tooting constituency have called for the name to be changed to 'Tooting and Balham' to reflect Balham's inclusion in the constituency.

## Counter-proposals - that divided wards

38. As suggested above, some counter-proposals were received which suggested the dividing of wards between constituencies, these included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at the initial proposals?
Putney Society	BCE-47142	Wandsworth and Putney, Wimbledon. This counter-proposal lacks detail regarding which polling districts in Earlsfield ward should be added to which constituency. Earlsfield ward to allow the Roehampton Heath and Putney ward to remain in a Putney constituency	No
Cllr David Leaf	BCE-51835	Bexley and Sidcup and Erith and Crayford Lesnes Abbey ward (LA1E polling district) This counter-proposal focuses on constituencies in the LB Bexley	Yes
Joseph Renny	BCE-51752	Croydon South East and Croydon South West Heathfield ward (polling districts HE1, HE2, HE3, HE4,HE5, HE6, HE7) to maintain the existing ties of community between Addiscombe and the centre of Croydon. This has also been submitted by the Labour Party (BCE-51850)	No

Labour Party	BCE-51850	Croydon South East and Croydon South West Heathfield ward (polling districts HE1, HE2, HE3, HE4,HE5, HE6, HE7) to maintain the existing ties of community between Addiscombe and the centre of Croydon	No
James Davis	BCE-45624	Norwood and Thornton Heath Thurlow park ward (polling districts (NLD and NLE) Crystal Palace ward (polling district CP2) Dulwich and Sydenham College ward (polling district COL4) Croydon South East Selhurst ward (polling districts SE5, SE6, SE7 and SE4)	No
Cllr Robert Benham (Romford)	BCE-51791	Dagenham and Rainham, Romford Eastbrook ward (Rush Green MA polling district)	Yes
Jon Cruddas MP	BCE-51388	Dagenham and Rainham, Romford. This proposal was submitted at initial proposals and is supported by the MP for Romford	Yes
Andrew Rosindell MP	BCE-51677	Dagenham and Rainham, Romford. This proposal was submitted at initial proposals and is endorsed by the MP for Dagenham and Rainham	Yes

Save our Southgate	BCE-50388	Enfield Southgate Enfield North. This counter-proposal suggest the splitting of Grange ward but doesn't provide details of polling district allocation. Grange ward (polling district YJB) to be placed in Enfield North to restore the previous status quo)	No
Liberal Democrats	BCE-51271	Hendon, Chipping Barnet, Finchley and Enfield Southgate. This counter-proposal is an alternative to the initials proposal. Oakleigh ward (polling district CED) to retain the four wards that cover Finchley together	No

The majority of these split ward counter-proposals cite the Commission's Brunswick Park ward split in the LB of Barnet as a precedent. However, most are local changes affecting adjacent constituencies.

#### Alternative constituency names

39. As always, the naming of the proposed constituencies has proved to be a contentious issue. Many representations do not object to the proposed boundaries of constituencies, but suggest alternative names. Some responders, such as Edward Keene (BCE- 42670), suggest a number of alternative names. Where alternative names result from changes proposed in the counter-proposals, these have not been listed below. Some of the alternative names suggested for constituencies for which no change in their composition is proposed are as follows:-

Proposed constituency name	Alternative names	Evidence for alternative name
Bexley and Sidcup	Bexleyheath and Sidcup	This avoids any confusion with the borough of Bexley - most of which is not in this constituency - Liberal Democrats (BCE-51271)
Brixton and Vauxhall	Vauxhall & Brixton North, Vauxhall & Stockwell, or Vauxhall	Avoids a clash of the use of Brixton with seat 58 - Liberal Democrats (BCE-51271)
Camden and St Pancras	Camden and Tufnell Park	Reflects the inclusion of Islington wards - Liberal Democrats (BCE-51271)
Chingford and Woodford	Chingford and Woodford Green	This enlarged seat does still not contain all of Woodford as Roding ward is left out - Liberal Democrats (BCE-51271)
Chipping Barnet	Chipping Barnet and West Finchley	More accurate description of split Finchley area - Liberal Democrats (BCE-51271)
Ealing and Acton	Ealing Central and Acton	More logical to leave its name as Ealing Central and Acton, rather than implying that all of Ealing Town is wholly within it by using the unsuffixed 'Ealing' in the title (BCE-51783)
Eltham and Welling	Eltham and East Wickham	Welling is a much larger area and most of Welling High Street is not in this constituency. This is a less misleading description - Liberal Democrats (BCE-51271)
Finchley and Enfield Southgate	Enfield Southgate and East Finchley	A more accurate description of the parts of Barnet in this constituency - Liberal Democrats (BCE-51271)

Finchley and Enfield Southgate	Southgate and Friern Barnet	Includes none of the original heart of Finchley, nor many of its more recent extensions (BCE-42670)
Finchley and Enfield Southgate	Cockfosters, Southgate and Friern Barnet	Misleading when the town of Finchley is not in the constituency (BCE-43814)
Greenford and Sudbury	Ealing North and Sudbury	Ealing North has been successfully used since 1950 as the name for the seat covering our Borough's northern communities (BCE-51783)
Greenford and Sudbury	Greenford and Wembley West	The wards coming onto the seat from Brent identify as part of Wembley - Liberal Democrats (BCE-51271)
Hackney Central	Hackney and Clapton	The suffix 'Central' in unnecessary because this proposed constituency includes almost all of the Hackney area (BCE-51229)
Hackney Central	Hackney	The proposed constituency is not merely the "central" part of Hackney, but the only Hackney constituency at all (BCE-42670)
Hackney Central	Hackney East	More accurate description - Liberal Democrats (BCE-51271)
Hammersmith and Fulham	Fulham and Hammersmith	Better reflects the balance of population - Liberal Democrats (BCE-51271)
Hayes and Harlington	Hayes and West Drayton, Hayes and Heathrow, or Hayes	More accurate description of the area within the constituency - Liberal Democrats (BCE-51271)
Hillingdon and Uxbridge	Uxbridge and Northolt	This reflects that this is a cross-borough seat - Liberal Democrats (BCE-51271)

Hillingdon and Uxbridge	Uxbridge	Uxbridge is unquestionably the main settlement in the proposed constituency (BCE-42670)
Hillingdon and Uxbridge	Uxbridge and Northolt	Given that Northolt is somewhat isolated in the far east of the seat, its inclusion in the name would serve to helpfully emphasise its presence (BCE-51783)
Hillingdon and Uxbridge	Uxbridge and South Ruislip	The name should reflect both main parts of the constituency (BCE-48710)
Hornsey and Wood Green	Hornsey	No specific reason given - Liberal Democrats (BCE-51271)
Ilford North and Wanstead	Barkingside and Wanstead	No specific reason given - Liberal Democrats (BCE-51271)
Ilford North and Wanstead	Barkingside and Wanstead	No specific reason given (BCE-44353)
Ilford South	llford	All of Ilford town and Ilford High Street is in the constituency and the name should be updated even if the constituency is unchanged - Liberal Democrats (BCE-51271)
Ilford South	llford	No specific reason given (BCE-44353)
Isleworth Brentford and Chiswick	Brentford and Chiswick	The extended name is unwieldy and not in proportion to the naming conventions for the rest of London - Liberal Democrats (BCE-51271)
Islington	Islington South and Finsbury	Keep the reference to the community of Finsbury, which covers several wards in the south of the constituency, separate from Islington - Liberal Democrats

		(BCE-51271)
Kilburn	Paddington	The constituency is made up of wards previously in the Metropolitan Borough of Paddington and would associate themselves with being part of Paddington (BCE-42184)
Kilburn	Queens Park, or Paddington and Queens Park	Kilburn misleading as many Kilburn residents in Camden are not included - Liberal Democrats (BCE-51271)
Kingston and Surbiton	Kingston South	The 'Surbiton' suffix is unnecessary as Surbiton has always been a suburb of Kingston (BCE-42670)
Richmond Park	Richmond and Kingston North	The residents of North Kingston should have separate recognition in the constituency name (BCE-42670)
Stepney and Bow	Bow and Whitechapel	No specific reason given - Liberal Democrats (BCE-51271)
Streatham and Brixton South	Streatham & Herne Hill, or Streatham	This name clashes with the use of Brixton in seat 6 - Liberal Democrats (BCE-51271)
Streatham and Brixton South	Streatham & Brixton Hill, or Streatham	As the 'main' Brixton constituency is simply called 'Brixton & Vauxhall', it is not logical to refer to 'Brixton South' in the name of this constituency (BCE-51229)
Tooting	Tooting and Balham	The whole of Balham is in a single constituency - Liberal Democrats (BCE-51271)
Tooting	Balham and Tooting	No specific reason given (BCE-48311)

Tooting	South Battersea and Tooting	No part of Balham ward is in Tooting - (BCE-43494)
Wandsworth and Putney	Putney and Wandsworth	Putney is the much larger settlement in this constituency - Liberal Democrats (BCE-51271)
Wandsworth and Putney	Putney, or Putney & Wandsworth Town	Wandsworth and Putney a confusing name as there are two other proposed constituencies in the borough of Wandsworth (BCE-47142)

## How to view representations in the portal

40. Commissioners have been provided with login details that allow you to view all of the representations in the portal, download and view attachments.

BCE/2018/Paper 5 - Annex D



# **COMMISSIONERS' INFORMATION PACK**

# NORTH EAST REGION

# FINAL RECOMMENDATIONS

# February 2018

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### Common national issues

1. We received over 35,000 representations across the country over the three consultation periods. Of these, approximately 10,700 were received in response to the consultation on the revised proposals. The spread of representations has not been even across the country. Representations received for each region are broken down in the table below. In addition, we have also received a number of petitions and writing campaigns during the final consultation. The total number of writing campaigns and petitions for each region is also provided in the table below.

Region	Consultation on revised proposals	Total representations	Total - petitions/ writing campaigns
East Midlands	421	2,048	6
Eastern	777	2,806	11
London	2,390	11,764	28
North East	540	1,968	7
North West	987	4,040	18
South East	2,511	5,438	26
South West	952	2,971	3
West Midlands	1,095	3,200	8
Yorkshire and the Humber	1,076	3,059	14
TOTAL	10,749	37,294	121

- In every region we have received representations that have not commented on specific boundaries, put forward alternatives or commented on names. These representations have largely focused on the following issues:
  - Opposition to the reduction in the number of MPs/constituencies
  - Opposition to having constituencies of equal size
  - Opposition to the use of the December 2015 electoral data
  - Opposition to using ward boundaries from May 2015
  - Concerns that the proposed boundaries reflect a political bias
  - Opposition to the proposals crossing county boundaries

- 3. We have not received regional-wide counter-proposals for every region in response to our revised proposals published in October 2017. In most cases, counter-proposals received during this consultation have been localised and focused on modifications to a small number of constituencies rather than across the entire region. These counter-proposals have been received from the central and local offices of the political parties, some politicians, and some individual members of the public. The central offices of the Conservative Party and Labour Party have made representations for all nine regions. The central offices for the other political parties did not submit a representation for each region, but in most cases the local offices have done so.
- 4. In some regions we have received counter-proposals that suggest dividing wards between constituencies. Details of these for this region are also provided later in this document.
- 5. Representations have also been received that comment only on the proposed names of constituencies. In some cases these have been localised comments; however, we have also received representations that have specifically commented on the Commission's approach to naming constituencies - i.e. length of name, cities/towns used in the constituency name and geographical context e.g. north/south.

### North East regional information

#### Number of representations received

6. In the North East, the Commission received a total of 540 representations during consultation on the revised proposals. In total the Commission received 1,968 representations for this region. There were also a number of duplicate representations within this total, as well representations that made general comments that did not have any bearing on the substance of the initial or revised proposals.

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1	The Commission received representations from the follow	/ind respondents
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Type of respondents	Consultation on revised proposals	Total number of representations
Member of Parliament	7	28
Official political party response	6	31
Peer from House of Lords	0	4
Local councillor	29	101
Local authority	5	16
Parish or town council	10	24
Other organisation	13	38
Member of the public	470	1,726
Total	540	1,968

#### <u>Campaigns</u>

8. As expected, throughout the region, representations from a number of organised campaigns were received. In the North East, these were as follows:-

Campaign	ID Number	Support/ oppose initial proposals	Strength (no. of signatories)
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Let's return Brockley Whins to South Shields!	BCE-51946	Oppose	142
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- 9. In each of these instances, you will find one copy of the standard representation, together with a list of the names and addresses of those who either signed petitions, or submitted pro-forma letters.
- 10. During the previous consultations the Commission received six campaigns in relation to the North East. The campaign from the South Tyneside Metropolitan Borough Council (BCE-33254) was put forward again during the consultation on the revised proposals (BCE-49751). A new campaign called 'Let's return Brockley Whins to South Shields!' was received. The majority of respondents in this campaign are residents of Bede ward polling district LC Brockley Whins.

#### Political party representations

- 11. Of the four main political parties, three have submitted detailed responses, and there have been numerous counter-proposals from local branches of the political parties, some of which offer alternatives and variations to those submitted by the national representatives of their parties. No counter-proposal has been received from anyone claiming to speak on behalf of UKIP.
- 12. The Liberal Democrats (BCE-51269) and the Green Party (BCE-49865) are the only political parties to have submitted counter-proposals in the North East region. The Liberal Democrats have looked to restore community ties in County Durham, which they claim have been broken, by proposing multiple ward swaps to create a City of Durham and Chester-le-Street constituency. In Cleveland, the Liberal Democrats propose that the ward of Ormesby be removed from the Middlesbrough and Eston constituency, and be added to the Redcar and Cleveland constituency.
- 13. The Green Party have once more put forward a counter-proposal that splits Bede ward. It is proposed that polling district LC Brockley Whins of Bede ward be included in a South Shields constituency along with the ward of Simonside and Rekendyke. As part of this, it is suggested that the ward of Boldon Colliery be included in a proposed Jarrow constituency. This proposal has received widespread support from local residents and involves no change to neighbouring constituencies.

- 14. The Labour Party (BCE-51850) support numerous constituencies in the North East region such as North Tyneside, Tynemouth, Sunderland Central, Washington and Sunderland West, Barnard Castle, and Hartlepool. However they object to constituencies such as City of Durham and Easington where they argue local ties have been broken. The Labour Party has not put forward any counter-proposals for constituencies in the North East.
- 15. The Conservative Party (BCE-51854) have endorsed all 25 constituencies in the North East.
- 16. Finally, it is important to note that all political parties have acknowledged that the Commission's revised proposals for the North East are a significant improvement on the initial proposals.

#### Sub-regions and counter-proposals that propose alternative sub-regions

- 17. The revised proposals were constructed on the sub-regions of:
  - Northumberland
  - Tyne and Wear, County Durham, Hartlepool, and Darlington
- 18. The following counter-proposals that have been received cover either the whole region or a sub-region, and we recommend you take time to familiarise yourself with these representations:-

Organisation or Individual	ID Numbers	Affected sub-regions	Similar counter-proposal received and considered at initial proposals?
Liberal Democrats	BCE-51269	County Durham	Yes
Jarrow CLP	BCE-51853	Tyne & Wear	Yes
South Tyneside Council	BCE-45271	Tyne & Wear	Yes
Nick Brown MP	BCE-51852	Tyne & Wear	No
Adrian Bailey	BCE-51851	Tyne & Wear, and County Durham	Partial
Paul Tinnion	BCE-45368	Tyne & Wear, and	Partial

		County Durham	
Adrian Bailey	BCE-51851	Northumberland, and Tyne & Wear	Partial

19. Of these proposals, only two have suggested alternative sub-regions. Adrian Bailey (BCE-51851) and Paul Tinnion (BCE-45368) both propose crossing the Northumberland county boundary by including the town of Prudhoe in a Blaydon constituency. This would mean the North East would not be divided into sub-regions. All other representations received have not proposed alternative sub-regions.

#### Detailed analysis of representations within sub-regions

#### Northumberland

- 20. The major issues that drew objections in this sub-region were:-
  - The east-west nature of the revised Hexham and Cramlington constituency
- 21. The Commission has also received some support for its revised proposals in this sub-region. Namely the proposed constituencies of Berwick and Morpeth, and Blyth and Ashington.
- 22. In response to the consultation the Commission received a limited amount of counter-proposals in this sub-region.

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Adrian Bailey	BCE-51851	Hexham and Cramlington	Yes
Paul Tinnion	BCE-45368	Hexham and Cramlington	Yes

23. The majority of respondents supported the Commission's decision to create a separate Northumberland sub-region comprising of three constituencies - Berwick and Morpeth, Blyth and Ashington, and Hexham and Cramlington.

However, it was suggested by some (see table above) that a Northumberland sub-region has resulted in a Blaydon constituency that is split across three local authorities.

- 24. In his counter-proposal, Adrian Bailey (BCE-51851) addressed this issue by crossing the Northumberland county boundary and including the town of Prudhoe in a Blaydon constituency. Mr. Bailey stated that this change would allow for a better pattern of constituencies in County Durham (see below).
- 25. Similar to Adrian Bailey, Paul Tinnion (BCE-45368) proposed adding Prudhoe to a Blaydon constituency which saw the County Durham ward of Burnopfield and Dipton included in a North West Durham constituency. This proposal would require significant changes to surrounding constituencies.

## Tyne and Wear, County Durham, Hartlepool, and Darlington

- 26. The major issues that drew objections in this sub-region were:-
  - The inclusion of Framwellgate and Newton Hall ward in a North Durham and Chester-le-Street constituency
  - Proposing a constituency that includes the City of Durham and the coastal towns of Easington and Peterlee
  - The continued inclusion of Simonside and Rekendyke ward in a revised Jarrow constituency
  - The proposal of a Blaydon constituency that crosses the river Tyne and that is split across three local authorities - Newcastle upon Tyne, Gateshead, and County Durham
- 27. The Commission has also received some support for its revised proposals in this sub-region. Namely the proposed constituencies of North Tyneside, Tynemouth, Sunderland Central, Washington and Sunderland West, Bishop Auckland, Darlington, and Redcar and East Cleveland.
- 28. In response to the consultation the Commission received a number of counter-proposals in this sub-region. Some counter-proposals suggested the splitting of wards between constituencies, these are detailed later in this section. The counter-proposals received that did not divide wards included:

constituencies I received and considered at	Organisation or Individual	ID Numbers	Affected revised proposal constituencies	
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			initial proposals?
Liberal Democrats	BCE-51269	City of Durham and Easington, Billingham and Sedgefield, Bishop Auckland, North West Durham, North Durham and Chester-le-Street, Middlesbrough and Eston, and Redcar and East Cleveland.	Yes
Paul Tinnion	BCE-45368	South Shields, Jarrow, Gateshead West, North West Durham, Bishop Auckland, Billingham and Sedgefield, North Durham and Chester-le-Street, and City of Durham and Easington.	Partial
Adrian Bailey	BCE-51851	Blaydon, Gateshead West, Jarrow, North Durham, North West Durham, Bishop Auckland, Sedgefield and Billingham, and City of Durham and Easington.	Partial
Adrian Bailey	BCE-51851	Blaydon, Newcastle upon Tyne East, Newcastle upon Tyne North West, Hexham and Cramlington, Blyth and Ashington, and Berwick and Morpeth.	Partial

29. The Liberal Democrats (BCE-51269) have acknowledged an overall improvement in constituencies in the sub-region. However, they are concerned with the proposed City of Durham and Easington constituency. As a result, they have put forward a number of changes with the aim of uniting all five City of Durham wards in a newly created City of Durham and Chester-le-Street constituency. This constituency is similar to one proposed in their response to the initial proposals.

- 30. In Cleveland, the Liberal Democrats propose that the Redcar and Cleveland council ward of Ormesby be moved from a Middlesbrough and Eston constituency to a Redcar and Cleveland constituency. It is claimed that the Ormesby ward is a predominantly rural facing ward as oppose to an urban facing one.
- 31. Paul Tinnion (BCE-45368) included Framwellgate and Newton Hall ward in a City of Durham and Easington constituency by proposing multiple changes in this sub-region. The proposal combined Crook with nearby Willington but separated Leadgate & Medomsley from Consett. Adrian Bailey (BCE-51851) has proposed an identical counter-proposal in this sub-region.
- 32. A challenge often experienced when dealing with County Durham is that given its location, it has often found itself compressed between Tyne and Wear, and Cleveland. As a result options available to the Commission have been limited and consequently many of the counter-proposals received during this consultation have been similar.

#### Counter-proposals - that divided wards

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Ward(s) to be divided and reason
Jarrow CLP	BCE-51853	Jarrow, and South Shields	Bede ward (polling district LC Brockley Whins) - to better reflect local community ties.
South Tyneside Council	BCE-49749	Jarrow, and South Shields	Bede ward (polling district LC Brockley Whins) - to better reflect local community ties.
Nick Brown MP (Newcastle upon Tyne East)	BCE-51852	Newcastle upon Tyne East, Newcastle upon Tyne North West	Westgate ward, West Gosforth ward, and Benwell and Scotswood ward - to better reflect local

33. As suggested above, some counter-proposals were received which suggested the dividing of wards between constituencies, these included:

			community ties / to ensure new boundaries are more in line with the new local government boundaries.
The Green Party	BCE-49865	Jarrow, and South Shields	Bede ward (polling district LC Brockley Whins) - to better reflect local community ties.

- 34. The counter-proposal to split Bede ward has been re-submitted by the South Tyneside Council (BCE-49749) and the Green Party (BCE-49865) amongst others. The proposal involved transferring Boldon Colliery ward from the South Shields constituency to the Jarrow constituency, while at the same time, moving the Simonside and Rekendyke ward, plus polling district LC Brockley Whins of Bede ward, from the Jarrow constituency to South Shields. A substantial amount of representations, including one campaign, have been received during this consultation supporting this counter-proposal.
- 35. When formulating the revised proposals, assistant commissioners carefully considered whether the evidence received to split Bede ward was 'exceptional and compelling'. As part of their analysis, assistant commissioners toured the area in July 2017 to assess the impact of any future proposals. Assistant commissioners concluded that the criteria to split a ward had not been met. However, they did specifically encourage in the revised proposals report to invite further evidence on the matter.
- As noted above we received a number of representations that commented on Bede ward, these included South Tyneside Council Members Support Unit (BCE-43949), Cllr Neil Maxwell (BCE-44239), Cllr Fay Cunningham (BCE-45271), Cllr O Punchion (BCE-51925), and Cllr Michael Henry Clare (BCE-49507).
- 37. Nick Brown MP for Newcastle upon Tyne East (BCE-51852) has called for wards in the city of Newcastle to align with the new local government boundaries however his counter-proposal failed to specify which polling districts he was referring to.

#### Alternative constituency names

38. As always, the naming of the proposed constituencies has proved to be a contentious issue. Many representations do not object to the proposed boundaries of constituencies, but suggest alternative names. Some responders, such as Edward Keene (BCE-43418), suggest a number of alternative names. Where alternative names result from changes proposed in the counter-proposals, these have not been listed below. Some of the alternative names suggested for constituencies for which no change in their composition is proposed are as follows:

Proposed constituency name	Alternative names	Evidence for alternative name
Billingham and Sedgefield	Aycliffe and Billingham	More adequately reflects the importance of Aycliffe in the new constituency (BCE-42071)
Gateshead West	Gateshead	In the absence of a corresponding constituency called 'Gateshead East' it seems totally unnecessary and cumbersome to add the distinguisher 'West' to the title of this constituency (BCE-43418)
Gateshead West	Gateshead and Whickham	Will indicate to local people that the reference to Gateshead in the name refers primarily to the traditional Gateshead, not the wider area of Gateshead Borough (BCE-51190)
Hexham and Cramlington	South Northumberland	Name is fair towards all the major settlements in this new constituency and precisely defines its geographical location (BCE-51376)
Newcastle upon Tyne North West	Newcastle upon Tyne West	Unnecessary given the absence of a proposed constituency named Newcastle-upon-Tyne North or

		-West (BCE-43418)
North Durham and Chester-le-Street	North Durham, or Chester-le-Street, or Chester-le-Street and Stanley	There is a second prominent town within the constituency, Stanley, which together with Chester-le-Street could be taken as suitably descriptive of the area (BCE-43418)
North Tyneside	Wallsend, or Wallsend and Longbenton	Only occupies half of the local authority named North Tyneside (BCE-43418)
North Tyneside	Wallsend, or Wallsend and Killingworth	Giving a constituency the same name as the local authority, when there are significant differences in the boundaries causes a lot of confusion for constituents (BCE-51269)
Redcar and East Cleveland	Redcar and Guisborough	Town of Guisborough constitutes a separate local service centre a little way away from Redcar (BCE-43418)
South Shields	South Shields and the Boldons	As these villages are closer to Sunderland and Hebburn than to South Shields, it would be appropriate to recognise them as a distinct area within the proposed constituency (BCE-43418)
Tynemouth	Whitley Bay and Tynemouth	To better reflect the geographical area and the communities that constituencies relate to (BCE-48032)

#### How to view representations in the portal

39. Commissioners have been provided with login details that allow you to view all of the representations in the portal, download and view attachments.



## **COMMISSIONERS' INFORMATION PACK**

## NORTH WEST REGION

### FINAL RECOMMENDATIONS

# February 2018

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#### Common national issues

1. We received over 35,000 representations across the country over the three consultation periods. Of these, approximately 10,700 were received in response to the consultation on the revised proposals. The spread of representations has not been even across the country. Representations received for each region are broken down in the table below. In addition, we have also received a number of petitions and writing campaigns during the final consultation. The total number of writing campaigns and petitions for each region is also provided in the table below.

Region	Consultation on revised proposals	Total representations	Total - petitions/ writing campaigns
East Midlands	421	2,048	6
Eastern	777	2,806	11
London	2,390	11,764	28
North East	540	1,968	7
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South West	952	2,971	3
West Midlands	1,095	3,200	8
Yorkshire and the Humber	1,076	3,059	14
TOTAL	10,749	37,294	121

- In every region we have received representations that have not commented on specific boundaries, put forward alternatives or commented on names. These representations have largely focused on the following issues:
  - Opposition to the reduction in the number of MPs/constituencies
  - Opposition to having constituencies of equal size
  - Opposition to the use of the December 2015 electoral data
  - Opposition to using ward boundaries from May 2015
  - Concerns that the proposed boundaries reflect a political bias
  - Opposition to the proposals crossing county boundaries

- 3. We have not received regional-wide counter-proposals for every region in response to our revised proposals published in October 2017. In most cases, counter-proposals received during this consultation have been localised and focused on modifications to a small number of constituencies rather than across the entire region. These counter-proposals have been received from the central and local offices of the political parties, some politicians, and some individual members of the public. The central offices of the Conservative Party and Labour Party have made representations for all nine regions. The central offices for the other political parties did not submit a representation for each region, but in most cases the local offices have done so.
- 4. In some regions we have received counter-proposals that suggest dividing wards between constituencies. Details of these for this region are also provided later in this document.
- 5. Representations have also been received that comment only on the proposed names of constituencies. In some cases these have been localised comments; however, we have also received representations that have specifically commented on the Commission's approach to naming constituencies - i.e. length of name, cities/towns used in the constituency name and geographical context e.g. north/south.

#### North West regional information

#### Number of representations received

6. In the North West, the Commission received a total of 987 representations during consultation on the revised proposals. In total the Commission received 4,040 representations for this region. There were also a number of duplicate representations within this total, as well representations that made general comments that did not have any bearing on the substance of the initial or revised proposals.

7	The Commission reasived representations from the following respondents:
1.	The Commission received representations from the following respondents:

Type of respondents	Consultation on revised proposals	Total number of representations
Member of Parliament	9	88
Official political party response	3	30
Peer from House of Lords	0	3
Local councillor	42	243
Local authority	14	55
Parish or town council	17	69
Other organisation	15	68
Member of the public	887	3484
Total	987	4,040

#### <u>Campaigns</u>

8. Representations from a number of organised campaigns were received. In the North West, these were as follows:-

Campaign	ID Number	Support/ oppose revised proposals	Strength (no. of signatories)
Keep Morecambe and Lunesdale	BCE-51975	Mostly Oppose	891

together in one Parliamentary seat			
Add Chaderton to the name of the proposed Oldham constituency	BCE-51948	Oppose name	136

- 9. In each of these instances, you will find one copy of the standard representation, together with a list of the names and addresses of those who either signed petitions, or submitted pro-forma letters.
- During the previous consultations the Commission received sixteen campaigns in relation to the North West region. The Commission received a similar set of letter writing campaigns (BCE-33223, BCE-33225, BCE-33227, BCE-41163, BCE-41164, and BCE-41165) regarding the Morecambe and Lunesdale constituency during the previous two consultations. At that time it received over 6000 comments in relation to that campaign, with the vast majority of respondents opposing our proposals.

#### Political party representations

- 11. Of the four main political parties, two have submitted detailed responses, and there have also been representations from local branches of the political parties, some of which offer alternatives and variations to those submitted by the national representatives of their parties. The representation of the Conservative Party (BCE-51950) supported 61 of the 68 constituencies in the revised proposals; suggested a name change; and proposed an alternative configuration to a remaining six constituencies in Lancashire.
- 12. The Labour Party (BCE-51850) welcomed many of the revised proposals for the North West - particularly in Cumbria and Merseyside. In Lancashire, Greater Manchester and the Wirral they did not fully agree with our proposed arrangements but they conceded that they were an improvement over the initial proposals and offered no counter-proposal for these sub regions. In Cheshire, they advocated minor changes to the proposed constituencies of Crewe and Nantwich, Weaver Vale, and Widnes and Runcorn.
- 13. No further representations which claimed to represent any other political parties were received.

#### Sub-regions and counter-proposals that propose alternative sub-regions

- 14. The revised proposal were constructed on the sub-regions of:
  - Cumbria
  - Lancashire (less three wards to Merseyside)
  - Merseyside (less the Wirral, inc three wards from West Lancs)
  - Greater Manchester, the Wirral, and Cheshire (Cheshire West and Chester, and Cheshire East)
- 15. We did not receive any counter-proposal which suggested alternative sub-regions.

#### Detailed analysis within sub-regions

#### Cumbria

- 16. There were no major issues raised within this sub region. There were relatively few representations received in reference to constituencies within Cumbria, with many of the proposed constituencies continuing to be broadly supported.
- 17. In the revised proposals, the Commission had suggested that the Bootle ward be transferred from the Barrow and Furness constituency to the Workington and Whitehaven constituency, which was also renamed to West Cumbria. These suggested changes have not proven to be contentious.
- 18. No substantive counter-proposals have been received for constituencies within Cumbria.

#### Lancashire (less three wards to Merseyside)

- 19. In Lancashire, some issues continue to attract significant opposition;
  - There continues to be strong opposition to the proposed Lancaster and Morecambe constituency.
  - A number of representations continue to voice concern over the large geographical size and lack of unity within the proposed North Lancashire constituency.
  - There is still significant opposition to the Pendle and Ribble Valley constituency, with calls for a reconfiguration to create a constituency

centered on the existing Ribble Valley constituency, and for the existing Pendle constituency to remain intact.

20. The Commission received a single counter-proposal for this sub-region, most notably from the Conservative Party but supported (and reiterated with added evidence) by a number of others. The representation from Ribble Valley Borough council (BCE-50279) proposed a Ribble Valley and Hyndburn constituency identical in configuration and name to that of the Conservative Party, but did not make any comment on how surrounding constituencies should be reconfigured.

Organisation or Individual	ID Number	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Conservative Party (and others)	BCE-51950	Lancaster and Morecambe, North Lancashire, Pendle and Ribble Valley, Hyndburn, Burnley, and Preston	Yes - re-affirmation of counter proposal submitted in the initial and secondary consultation periods (BCE-33246)

21. The majority of the opposition to our Lancaster and Morecambe constituency came in the form of a letter writing campaign (BCE-51975), submitted by David Morris, the current MP for Morecambe and Lunesdale. The campaign called for Morecambe to remain in a separate constituency to Lancaster, and invited respondents to provide their views on the proposed constituency to the Commission. It contained over 891 individual comments and was signed primarily by signatories of previous petitions submitted by Mr Morris, the vast majority of which were not in favour of the proposed Lancaster and Morecambe constituency. In addition to this, the Commission received several individual representations from constituents in the Morecambe, Heysham and Carnforth areas who also objected to the Commission's proposals. The representation of the Conservative Party (BCE-51950) called on the Commission to reconsider their counter-proposal for Lancashire as put forward in previous consultation rounds, which retained a Morecambe and Lunesdale constituency. Examples of support for the retention of a

Morecambe and Lunesdale constituency submitted as part of the letter writing campaign (BCE-51975) include Barbara Abel, who stated: 'The reason I think Morecambe & Lunesdale should continue to remain separate from Lancaster is because the two areas have seperate requirements. Morecambe is a seaside & industrial area and Lunesdale is a rural community, whereas Lancaster is a University and City led constituency with different needs that do not match the Morecambe & Lunesdale requirements.' Mr and Mrs Downs remarked that they were 'totally against the Boundary Commissions plan to do away against the Morecambe and Lunesdale seat as we see ourselves separate from Lancaster' and Emma Laird, who expressed her view that Carnforth should continue to be linked Morecambe as it 'has more in common with the seaside town 10 minutes down the road, than with a vast and sprawling rural area in the North of Lancashire.'

- 22. Conversely, we did receive a number of representations from individuals in support of the proposed constituency, such as from Peter Brown (BCE-43790), a resident of Morecambe. In his representation Mr Brown notes that 'Lancaster and Morecambe are constituent parts of the Lancaster City Council area, it makes perfect sense to create a Parliamentary constituency incorporating both urban areas.' In addition, a representation from Barbara Holt (BCE-42560) noted that the existing Morecambe and Lunesdale constituency is not separate to Lancaster even in its current form. In her submission, Ms Holt states 'It makes no sense for my local area of Skerton to be in Morecambe and Lunesdale as we are traditionally part of the City of Lancaster.' In their representation, the Labour Party (BCE-51850) commended the Lancaster and Morecambe constituency, and also the rejection of proposals that would have separated the Bulk ward from the rest of Lancaster.
- 23. The proposed North Lancashire constituency was again criticised for its geographical size and for the lack of a central focal point. Susan Woods (BCE-43371) states 'If these changes take place I will be in a constituency covering a vast area but with no centre' and that the 'constituency is so large it is difficult to see how it would function on a practical basis. Abigail Boyle (BCE-42099) shares this view noting that 'the constituency crosses over 4 local authorities, they all have different needs and wants. It would also be a nightmare to canvass around.' Paul Brindle objected to the inclusion of Silverdale in the North Lancashire constituency, commenting 'I strongly disagree that this part of North Lancs should be included in such afar reaching seat and areas such as Longridge & outer areas of Clitheroe. Silverdale/Carnforth is associated with Morecambe/Lancaster in many ways & should be served by a M.P from that area who has a natural close association

with this North West corner of Lancashire.' The views expressed are similar to those seen during the secondary consultation; and, they were taken into account when the assistant commissioners considered the revised proposals. The Conservative Party (BCE-51950) considered the North Lancashire constituency to be 'a particularly poorly constructed constituency', and as mentioned above, commended their own proposals which they felt better reflected the statutory factors.

- 24. The Pendle and Ribble Valley constituency was criticised for its elongated shape and for the degree of change undertaken to the existing constituencies. Many representations did not like the 'merger' of the two districts and advocated less change. Heather Birch (BCE-43470), called for a new Ribble Valley constituency which included the many rural areas of the Ribble Valley which were proposed to be put in North Lancashire. Meanwhile, in Pendle, there were concerns that the town of Nelson, which is located within Pendle district, would be split from Colne and placed in a Burnley constituency (BCE-51395). Similar arguments were seen in the secondary consultation, however, the assistant commissioners considered that a reconfiguration along these lines would require consequential changes across the county.
- 25. The transfer of the St Leonard's and Kilnhouse wards from Blackpool South into Fylde (thus re-unifying St Annes into one constituency) was almost unanimously supported. Some representations have however expressed opposition to the consequential division of Poulton-Le-Fylde between constituencies to facilitate these changes.
- 26. The Commission has received no significant support or objection for the remainder of constituencies within Lancashire.

#### Merseyside (less the Wirral, inc three West Lancs wards)

- 27. The major issues that drew objections in this county were:-
  - Opposition to the inclusion of three West Lancashire borough wards in the proposed Southport constituency
  - Opposition to the dissolution of the Liverpool, Walton constituency
- 28. The inclusion of the three West Lancashire Borough wards of Hesketh-with-Becconsall, North Meols, and Tarleton has been opposed to a greater degree than in previous consultation rounds. Opposition to this constituency focused on the difference in nature between these three wards and the rest of the proposed constituency (eg BCE-46198).

- 29. The dissolution of the Liverpool, Walton constituency has once again been opposed by many respondents such as Sheila Pavely (BCE-48204) and Susan Dykes (BCE-51042). Other objections to constituencies within the Liverpool City area focused on the proposed transfer of the County and Warbreck wards to the Bootle constituency, for example that of Barry Worthington (BCE-45991) and Brendan Bradley (BCE-46088).
- 30. There were no other major issues raised within this sub region. Most of the representations submitted during this consultation echo what was said in the previous consultations; feedback is either broadly supportive or objects to the principle of the review.
- 31. Our revised proposals for Merseyside were left unchanged from the initial proposals and we have received only one counter-proposal, which also suggests a division of a ward in Warrington. This is detailed later on is this paper.

# Greater Manchester, the Wirral, and Cheshire (Cheshire West and Chester, and Cheshire East)

- 32. The major issues that drew objections in this sub-region were:
  - Opposition to the proposed cross-county Altrincham and Knutsford constituency
  - The inclusion of the Ashton upon Mersey ward in the Stretford and Urmston constituency
  - Opposition to the configuration, and naming of constituencies in the Oldham Borough local authority area
  - Opposition to the naming of the Bebington and Heswall constituency
  - Opposition to the inclusion of the Audlem ward in the Crewe and Nantwich constituency
- 33. In response to the consultation the Commission received a number of counter-proposals in this sub-region. Some counter-proposals suggested the splitting of wards between constituencies, these are detailed later in this paper. The counter-proposals received that did not divide wards included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Adrian Bailey	BCE-51953	Crewe and Nantwich, Eddisbury, Weaver Vale	No
Terry Largan	BCE-51954	Hazel Grove and Wilmslow, Stockport North and Denton, Stockport South and Cheadle	No
Jonathan Stansby	BCE-42229	Hazel Grove and Wilmslow, Stockport North and Denton, Stockport South and Cheadle	No
Brian and Sylvia Chaplain	BCE-50269	Altrincham and Knutsford, Wythenshawe and Sale East, Stockport North and Denton, Stockport South and Cheadle, Hazel Grove and Wilmslow, Macclesfield, and High Peak	No
Stephen Lees	BCE-46314	Oldham, Failsworth and Droylsden	No

34. On the Wirral, despite the inclusion of the Bebington ward, the naming of the proposed Bebington and Heswall constituency continues to be an issue. Many respondents expressed the opinion that this name was not inclusive to other areas contained within the constituency, and continue to suggest that the name 'Wirral' feature in its title in some form.

- 35. Many respondents have commented that while the Commission's proposed Weaver Vale and Eddisbury constituencies are an improvement on those suggested in the initial proposals, they are opposed to the continued division of Northwich between constituencies. The counter-proposal of Adrian Bailey (BCE-51953) sought to address this issue by reconfiguring the constituencies of Crewe and Nantwich, Weaver Vale, and Eddisbury.
- 36. The inclusion of the Audlem ward in the Crewe and Nantwich constituency was met with opposition. The Labour Party (BCE-51850) and respondents such as Sandra Link (BCE- 41622) considered there to be no commonality between the ward and the rest of the constituency. The representation from Cheshire East Council (BCE-50094) however was fully supportive of the proposal.
- 37. The cross-county constituency of Altrincham and Knutsford continues to be highly contentious, with many respondents arguing that the urban character of Altrincham did not fit with the small market town feeling of Knutsford. A counter-proposal submitted by Brian and Sylvia Chaplain (BCE-50269) sought to link Macclesfield with Knutsford in a constituency, and reconfigured constituencies within Greater Manchester and Cheshire to accommodate the change. Their counter-proposal also suggested that the Poynton East ward be included the High Peak constituency, thus crossing the regional boundary. This counter-proposal was similar in many ways to the proposal put forward by the Conservative Party, at the initial proposals. However, the reconfigured Macclesfield constituency, which now largely resembles its existing configuration, is now widely supported, by both local and the national branch of the Conservative Party. Furthermore, the representation from Cheshire East Council (BCE-50089), while not endorsing the proposal, did make note that prior to 1974 there were 'connections between Altrincham and Knutsford when Altrincham was then part of Cheshire.'
- 38. Another cross-county constituency, Hazel Grove and Wilmslow, has been met with both support and opposition. Supporters include a large number of residents in Poynton and Disley whom under the initial proposals would have been transferred out of the Macclesfield constituency and into the proposed cross-county constituency of Bramhall and Poynton a move which generated fierce opposition. Critics of the new proposal point to the division of the Heatons North and Heatons South wards between constituencies, and the perceived linking of the two distinct and separate areas (Wilmslow and Hazel Grove) into a single constituency. Terry Largan (BCE-51954) and Jonathan Stansby (BCE-42229) both submitted counter-proposals which sought to reunite the wards of Heatons North and Heatons South. Mr Stansby's

proposal would place both Heatons wards into the Stockport South and Cheadle constituency (which he suggested should be renamed Cheadle and the Heatons), and include the Stockport ward of Offerton in a Stockport North and Denton constituency. However, a subsequent representation from Mr Stansby (BCE-45029) stated that, on reflection, the linking of Hazel Grove and Wilmslow was not appropriate, and that it would be 'much more desirable to link Wilmslow with Cheadle. In order to achieve this, he suggested that the Brinnington and Central ward be divided, so that consequential knock-on effects do not occur elsewhere in Greater Manchester. He acknowledged that this counter-proposal divides the Bramhall North, and Bramhall South and Woodford wards between constituencies, but observes that 'there is a clear dividing line between them created by the railway.'

- 39. Our inclusion of the two Sale wards of Ashton upon Mersey and St. Mary's in the proposed Stretford and Urmston constituency was again met with opposition. The wards are physically cut off from Stretford and Urmston by the River Mersey and many respondents were upset that the constituency was not demarcated by this natural boundary. Opponents such as Janet Daniels (BCE-50650) also noted the close historical, geographic and cultural links the wards have with Sale and Altrincham as opposed to Stretford and Urmston.
- 40. The constituencies of Oldham, and Failsworth and Droylsden were both amended in our revised proposals, with the intention of avoiding dividing both Royton and Saddleworth. This change was recognised as an improvement by respondents; but some argued it did not go far enough, and that the two constituencies were incoherent. The Oldham constituency was the subject of a petition which sought to have the name changed to include the town of Chadderton (BCE-45542 & BCE-51948); the rationale behind this change being that our current proposal for Oldham contains as many Chadderton wards as it does Oldham wards. Indeed, a criticism we have seen directed towards our Oldham constituency is that much of the town of Oldham is located outside of the constituency borders. Stephen Lees (BCE-46314) submitted a counter proposal for Oldham borough which he believed more closely reflected the community boundaries and local ties 'by including the whole of the core of Oldham and the two Royton wards' in a single constituency. By making his proposed changes to Oldham, he argued that he was also able to propose a better constituency for the areas covered by our Failsworth and Droylsden constituency. His suggested new constituency would be called Chadderton and Droylsden; it would include the areas of Chadderton and Failsworth - in Oldham borough, the Manchester ward of Moston as well as the Audenshaw and Droylsden wards located in Tameside. Mr Lees notes that this constituency may not 'seem to be coherent at first

sight' but that it is 'more coherent than either of the Commission's proposed constituencies since neither Moston nor Droylsden and Audenshaw have any real connection to the centre of Oldham'.

- 41. The dissolution of the Stalybridge and Hyde constituency, and the subsequent absorption of Stalybridge into our Ashton-Under-Lyne constituency, generated a lot of criticism from residents of Stalybridge. The representations from the town were clear that they did not wish to be considered a 'suburb of Ashton-Under-Lyne'. David Tilbrook (BCE-49478) shared this view and suggested it could be resolved by including simply including Stalybridge in the constituency name.
- 42. The changes made to Stalybridge and Hyde have also been criticised by residents of the proposed Marple and Hyde constituency. Respondents in the village of High Lane, in the Marple South ward, have told us that the town had no affinity with Hyde and that it identifies more with the neighbouring areas of Disley and Hazel Grove. Peter Howard (BCE-50061) put forward a counter-proposal that would move Marple South Ward out of Marple and Hyde and into Hazel Grove and Wilmslow; to compensate for this move, he would then move Offerton ward into the Marple and Hyde constituency.
- 43. The Commission has received no significant support or objection for the remainder of constituencies within this sub-region.

#### Counter-proposals - that divided wards

44. As suggested above, counter-proposals were received which suggested the dividing of wards between constituencies; these included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Ward(s) to be divided and reason
Jonathan Stansby	BCE-45029	Hazel Grove and Wilmslow, Stockport North and Denton, Stockport South and Cheadle	Brinnington and Central ward is divided to allow Wilmslow to be linked to Cheadle
Alison McDonald (Warrington Borough Council)	BCE-49807	Warrington North and Warrington South	Whittle Hall ward, polling district SEE/1, to align

	with new ward boundaries.
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#### Alternative constituency names

45. As always, the naming of the proposed constituencies has proved to be a contentious issue. Many representations do not object to the proposed boundaries of constituencies, but suggest alternative names. Some responders, such as Edward Keene (BCE-48112), suggest a number of alternative names. Where alternative names result from changes proposed in the counter-proposals, these have not been listed below. Some of the alternative names suggested for constituencies for which no change in their composition is proposed are as follows:

Proposed constituency name	Alternative names	Evidence for alternative name	
Accrington	Hyndburn (and variants)	(BCE- 47194, 47235, 47258, 47685, 47819, 47894) The existing constituency is called Hyndburn and any new constituency centred around Hyndburn should keep Hyndburn in the name.	
Ashton-under-Lyne	Ashton and Stalybridge, Tameside East	(BCE-49478) To recognise Stalybridge in the name of the constituency	
Bebington and Heswall	Wirral Deeside and Bebington	(BCE-43291) The name Bebington and Heswall is too obscure	
Bebington and Heswall	West Wirral and Bebington, Wirral West and Bebington	(BCE-45358) Constituency lies on the west side of the Wirral peninsula, with the exception of Bebington (BCE-50631) 'Bebington and Heswall' ignores the sizeable towns of Hoylake and West Kirby	

Bebington and Heswall	Wirral	(BCE-48199) The proposed constituency is an amalgamation of the existing Wirral West and Wirral South constituencies
Bebington and Heswall	Mid Wirral, West Wirral	(BCE-45711, BCE-44088) Suggested constituency names are more 'apt, succinct, and all embracing'
Bebington and Heswall	Wirral South and West	(BCE-45706) Wirral South and West is a more 'logical' name
Bebington and Heswall	Hoylake and Heswall/Heswall and Hoylake, Wirral Central	(BCE-43834) - Hoylake/Heswall has nothing in common with Bebington. Much of the area that people think of as 'Bebington' is not included in the constituency
Blackley and Broughton	Manchester North and Broughton, Manchester North and Salford East	(BCE-41245) Manchester North ties in all the distinct, individual towns north of the city centre' Blackley is not 'necessarily the most populous area in the constituency'
Blackley and Broughton	Manchester North	(BCE-42127) There is a lot more to the constituency than just Blackley
Blackley and Broughton	Manchester Blackley & Broughton	(BCE-47166) The constituency contains large parts of the City of Manchester
Bolton West	Horwich & Westhoughton, Atherton, Horwich & Westhoughton, South East Lancashire	(BCE-50320) To fully reflect all of the towns and areas in the constituency, from either borough,

		recognising that regardless of administrative area, borough, or city region, all these towns and areas remain geographically and culturally within the ancient historic boundaries of the County Palatine
Failsworth and Droylsden	Oldham South and Droylsden	(BCE-42128) Proposed constituency contains 5 Oldham township wards (BCE-45879) Largest component of constituency is much of the town of Oldham
Hazel Grove and Wilmslow	Wilmslow and Bramhall	(BCE-50096) None provided
Oldham	Oldham North and Chadderton	(BCE-42128)Constituency contains only three wards from Oldham itself
Oldham	Oldham and Royton	(BCE-42144) Should be renamed now that both Royton North and Royton South wards are included in the constituency
Oldham	Oldham West, Oldham West and Moston	(BCE-45879) Oldham West is a familiar local constituency name, first used in 1950, which should be retained.
Stockport South and Cheadle	Stockport West and Cheadle	(BCE-41291)Constituency includes the Heatons South Ward, which is north of Stockport Town Centre, North of the M60, and North of the River Mersey.
Stretford and Urmston	Trafford East	(BCE-42694) Current name excludes

		communities such as Davyhulme, Flixton and Lostock.
Wythenshawe and Sale East	Manchester Wythenshawe and Sale East	(BCE-47166) The constituency contains large parts of the City of Manchester

## How to view representations in the portal

46. Commissioners have been provided with login details that allow you to view all of the representations in the portal, download and view attachments.



# **COMMISSIONERS' INFORMATION PACK**

# SOUTH EAST REGION

## FINAL RECOMMENDATIONS

# February 2018

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#### Common national issues

1. We received over 35,000 representations across the country over the three consultation periods. Of these, approximately 10,700 were received in response to the consultation on the revised proposals. The spread of representations has not been even across the country. Representations received for each region are broken down in the table below. In addition, we have also received a number of petitions and writing campaigns during the final consultation. The total number of writing campaigns and petitions for each region is also provided in the table below.

Region	Consultation on revised proposals	Total representations	Total - petitions/ writing campaigns
East Midlands	421	2,048	6
Eastern	777	2,806	11
London	2,390	11,764	28
North East	540	1,968	7
North West	987	4,040	18
South East	2,511	5,438	26
South West	952	2,971	3
West Midlands	1,095	3,200	8
Yorkshire and the Humber	1,076	3,059	14
TOTAL	10,749	37,294	121

- In every region we have received representations that have not commented on specific boundaries, put forward alternatives or commented on names. These representations have largely focused on the following issues:
  - Opposition to the reduction in the number of MPs/constituencies
  - Opposition to having constituencies of equal size
  - Opposition to the use of the December 2015 electoral data
  - Opposition to using ward boundaries from May 2015
  - Concerns that the proposed boundaries reflect a political bias
  - Opposition to the proposals crossing county boundaries

- 3. We have not received regional-wide counter-proposals for every region in response to our revised proposals published in October 2017. In most cases, counter-proposals received during this consultation have been localised and focused on modifications to a small number of constituencies rather than across the entire region. These counter-proposals have been received from the central and local offices of the political parties, some politicians, and some individual members of the public. The central offices of the Conservative Party and Labour Party have made representations for all nine regions. The central offices for the other political parties did not submit a representation for each region, but in most cases the local offices have done so.
- 4. In some regions we have received counter-proposals that suggest dividing wards between constituencies. Details of these for this region are also provided later in this document.
- 5. Representations have also been received that comment only on the proposed names of constituencies. In some cases these have been localised comments; however, we have also received representations that have specifically commented on the Commission's approach to naming constituencies - i.e. length of name, cities/towns used in the constituency name and geographical context e.g. north/south.

#### South East regional information

#### Number of representations received

6. In the South East, the Commission received a total of 2,511 representations during the consultation on the revised proposals. In total the Commission received 5,438 representations for this region. There were also a number of duplicate representations within this total, as well representations that made general comments that did not have any bearing on the substance of the initial or revised proposals.

<ol><li>The Commission received representations from the following respondents</li></ol>	7.	The Commissior	received r	representations	from the	following respondents	:
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Type of respondents	Consultation on revised proposals	Total number of representations	
Member of Parliament	17	70	
Official political party response	20	59	
Peer from House of Lords	0	1	
Local councillor	69	311	
Local authority	21	53	
Parish or town council	46	104	
Other organisation	26	99	
Member of the public	2,312	4,741	
Total	2,511	5,438	

#### <u>Campaigns</u>

8. As expected, throughout the region, representations from a number of organised campaigns were received. In the South East, these were as follows:-

Campaign	ID Number	Support/ oppose revised proposals	Strength (no. of signatories)
Support for Gillingham and Rainham Constituency	BCE-45966	Support	175
Support for Rochester and Strood Constituency	BCE-48375	Support	5
Support for Chatham and Aylesford (Malling) Constituency	BCE-48372	Support	3
Tell the Boundary Commission that Lordswood isn't part of Gillingham	BCE-51957	Oppose	337
Support for the BCE's proposals for Lewes & Uckfield, and Brighton Kemptown and Seahaven	BCE-48368	Support	5
Opposition to BCE's proposal to move the ward of Windlesham from the Surrey Heath constituency to the Windsor constituency	BCE-51956	Oppose	368

- 9. In each of these instances, you will find one copy of the standard representation, together with a list of the names and addresses of those who either signed petitions, or submitted pro-forma letters.
- 10. During the previous consultations the Commission received 20 campaigns in relation to South East region. Of these, the campaigns for Gillingham and Rainham, Rochester and Strood, Chatham and the Mallings, and Lordswood were put forward again during the consultation on the revised proposals.

#### Political party representations

11. Of the four main political parties, each have submitted detailed responses, and there have been numerous counter-proposals from local branches of the political parties, some of which offer alternatives and variations to those submitted by the national representatives of their parties. The Conservative Party (BCE-51965) support 74 of the proposed 83 constituencies in full, with a name change for one, counter-proposals for five in East Sussex, Kent, and Buckinghamshire, and request that we consider a fresh approach to three constituencies in Berkshire and Surrey. The Labour Party's response to the revised proposals (BCE-51850) has slightly modified their position to reflect the degree of change in the revised proposals, but makes no counter-proposals, instead asking us to review options for Mid Kent and Ticehurst, Tonbridge, and Tunbridge Wells and Crowborough constituencies. The Liberal Democrats (BCE-51325) suggest a name change for Eastbourne, under the false impression that the current name for Eastbourne is actually Eastbourne and Willingdon, and proposing that it remain so. They also suggest a single ward swap between the constituencies of Maidstone and Tonbridge. The Green Party (BCE-51831) have maintained their position throughout the consultation, only commenting in detail on constituencies around Brighton. No counter-proposal has been received from anyone claiming to speak on behalf of UKIP other than their counter-proposal for Ashford (BCE-29183) submitted during the initial proposal consultation.

#### Sub-regions and counter-proposals that propose alternative sub-regions

- 12. The revised proposals were constructed on the sub-regions of:
  - Berkshire and Surrey
  - Buckinghamshire
  - Brighton and Hove, East Sussex, Kent, and Medway
  - West Sussex
  - Hampshire
  - Isle of Wight
  - Oxfordshire
- 13. The following counter-proposals have been received that cover either the whole region or a sub-region, and we recommend you take time to familiarise yourself with these representations:-

Organisation or Individual	ID Numbers	Affected sub-regions	Similar counter-proposal received and considered at initial proposals?
Conservative Party	BCE-51965	Berkshire and Surrey Brighton and Hove, East Sussex, Kent, and Medway Buckinghamshire	Yes

		and Milton Keynes Oxfordshire	
Al Neal	BCE-41697	Berkshire, Oxfordshire	No
Alan Johnson	BCE-45041	Hampshire, Surrey	No
Chilworth Parish Council	BCE-50136	Hampshire Bournemouth, Dorset, Poole and Wiltshire	Yes
Oliver Raven	BCE-51762	Brighton and Hove, East Sussex, Kent, and Medway West Sussex	Yes
Andrew Smith	BCE-48002	Buckinghamshire and Milton Keynes	Yes
Jane Olds	BCE-51313 BCE-51549	Oxfordshire	Yes

- 14. Of these proposals three have put forward alternative sub-regions. Alan Johnson proposes that Hampshire be included in a sub-region with Surrey. Oliver Raven proposes that Brighton and Hove be included in a sub-region with East Sussex and West Sussex. Al Neal proposes that Berkshire be included in a sub-region with Oxfordshire.
- 15. Three of these counter-proposals cross region boundaries. Chilworth Parish Council proposes that Hampshire be included in a sub-region with Wiltshire, crossing the South West boundary. Jane Olds proposes that Oxfordshire be included in a sub-region with South Northamptonshire, crossing the East Midlands boundary. Andrew Smith proposes including Milton Keynes in a sub-region with South Northamptonshire, crossing the East Midlands boundary. Other representations have not proposed alternative sub-regions or suggested the crossing of region boundaries.

#### Detailed analysis of representations within sub-regions

#### **Berkshire and Surrey**

16. The major issues that drew objections in this sub-region were:-

- Moving Windlesham ward from Surrey Heath to Windsor, across the Berkshire/Surrey boundary, to increase electors in Windsor.
- Moving Bucklebury and Basildon wards from Newbury to Reading West, to reduce electors in Newbury and increase them in Reading West.
- Moving Thorpe ward from Runnymede and Weybridge to Spelthorne, to increase electors in Spelthorne. Many representations suggested Egham Hythe as an alternative, but this leaves Runnymede and Weybridge with too few electors
- Moving Hersham South ward from Esher and Walton to Runnymede and Weybridge, to reduce electors in Esher and Walton, and increase electors in Runnymede and Weybridge.
- 17. The Commission has also received some support for its revised proposals in Berkshire and Surrey. Namely the proposed constituencies of Reading East and Slough were supported by members of the public and, apart from the Windlesham ward move into Windsor, the sub-region was supported by both the Conservative Party and Labour Party.
- 18. In response to the consultation the Commission received a number of counter-proposals in this sub-region. Some counter-proposals suggested the splitting of wards between constituencies, these are detailed later in this document. The counter-proposals received that did not divide wards included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Conservative Party	BCE-51965	Whole region	Yes
Al Neal	BCE-41697	Newbury, Reading East, Reading West, Wantage, Wokingham	No
Paul Willis	BCE-44384	Newbury, Reading West	No
Surrey Heath Conservative Association	BCE-44506	Bracknell, Surrey Heath, Windsor	No
Jonathan Stansby	BCE-43956	Runnymede and	Yes

	BCE-44006	Weybridge, Spelthorne, Surrey Heath	
Alan Johnson	BCE-45041	Aldershot, Surrey Heath	No
Paul Whitehead	BCE-45445	Surrey Heath	No
David James Su Knight John Dalton Philip Hall Ian Patenall Jillian Williams Eiry Price Robert Keen Kenneth Cooper Moreton Moore	BCE-46009 BCE-47477 BCE-48206 BCE-48302 BCE-48849 BCE-48972 BCE-49205 BCE-49289 BCE-51338 BCE-51488	Runnymede and Weybridge, Spelthorne	No
Tim Dodds	BCE-51439	Surrey Heath, Woking	No

19. Under the initial proposals the Slough ward of Chalvey was included in Windsor constituency. Representations received in response to the initial and second consultation opposed this proposal. In developing the revised proposal, assistant commissioners identified that including the Chalvey ward in the Slough constituency would require a ward in the Bracknell area or in Surrey being included in the Windsor constituency. After visiting the area, assistant commissioners recommended the inclusion of the Windlesham ward in the Windsor constituency. The Conservative Party (BCE-51965) accept the revised proposals for Berkshire and Surrey, but would like us to reconsider ways to avoid including Windlesham ward in the Windsor constituency, perhaps by including a Bracknell Forest ward. Surrey Heath Conservative Association (BCE-44506) would also like the Windlesham constituency changed, specifying that the Bracknell ward of Crown Wood ward should be included in the Windsor constituency. Paul Whitehead (BCE-45445) makes some vague suggestions as to how to resolve the odd shape of the Surrey Heath constituency and so keep Windlesham within it, although making sufficient space in Surrey Heath to retain it is not really the issue here. Tim Dodds (BCE-51439) suggests uniting all the military land in this area into a single constituency, for much the same reason as Mr Whitehead. A number of representations have opposed the inclusion of the Windlesham ward in the Windsor constituency, for example S Alwareeth (BCE-49646) points out "Windlesham has close ties with neighbouring villages Bagshot and

Lightwater, sharing a Parish Council with them. Historically and geographically Windlesham has no close ties to Windsor". The petition organised by the Windlesham Society (BCE-51956) contained 368 signatures opposing the proposal.

- 20. A number of representations have opposed the inclusion of the Basildon and Bucklebury wards in the Reading West constituency. For example, Laurence Kevin Taylor (BCE-42703) says "Adding a very rural community, such as the wards of Basildon and Buckleberry into the Reading West constituency does not serve to provide a united community of interest." Streatley Parish Council (BCE-50144) "objects strongly to the proposal to relocate Basildon Ward into Reading West constituency. Streatley, together with its rural neighbours in Basildon ward, has little in common with the urban and suburban nature of Reading West constituency. Many of the issues that concern Streatley: services, local public transport, schooling, shops and post offices, take on a different dimension from the same issues in an urban setting. A way of life in an Area of Outstanding Natural Beauty is unlikely to be enhanced by being transferred to an urban environment." Margaret Richards (BCE-50571) states that "The Bucklebury Ward comprises a largely rural area of scattered housing which naturally looks to Newbury for association and work. Farming, as opposed to commercial operations, and families choosing to dwell in the countryside, figure hugely in the area proposed to be moved to Reading West." No complete solution to resolve the objection to the inclusion of Basildon and/or Bucklebury wards in Reading West was received, but there are possible solutions which might bring us back closer to the initial proposals for the West of Berkshire. Al Neal (BCE-41697) suggests reshaping Reading and Wokingham and extending the Newbury constituency into Oxfordshire, in an attempt to undo 40 years of local government reorganisation. Paul Willis (BCE-44384) suggests including Aldermaston in the Reading West constituency, in spite of it not being adjacent to any part of the existing constituency.
- 21. The Commission has also received opposition to its proposed constituencies of Runnymede and Weybridge, and Spelthorne constituencies. Some counter-proposals have been received including, Jonathan Stansby (BCE-44006) who suggests adding Egham Hythe as well as Thorpe ward to Spelthorne, and moving Shepperton Town ward to the Runnymede and Weybridge constituency. He does this because adding Egham Hythe alone to Spelthorne would leave Runnymede and Weybridge below the permitted electorate range, a fact not noticed by those in the penultimate line of the table above, who all suggested Egham Hythe being included in Spelthorne without making any further adjustment. Alan Johnson (BCE45041) suggests a

more radical solution, crossing the Hampshire/Surrey boundary to create more coherent constituencies, but without providing specific detail.

#### Brighton and Hove, East Sussex, Kent, and Medway

- 22. The major issues that drew objections in this sub-region were:-
  - Moving Newhaven and Seaford into a Brighton Kemptown and Seahaven constituency.
  - Moving areas on the outskirts of Tunbridge Wells to a Tonbridge constituency.
  - Moving Ticehurst to a Mid Kent and Ticehurst constituency.
- 23. The Commission has also received both support and opposition for its revised proposals in Brighton and Hove, East Sussex, Kent, and Medway. The proposed constituency of Gillingham and Rainham was supported. The inclusion of Lordswood ward in Gillingham and Rainham, the inclusion of Ticehurst and Etchingham in Mid Kent and Ticehurst, and the division of Whitstable across the Canterbury and Faversham and North Kent Coastal constituencies were opposed.
- 24. In response to the consultation the Commission received a number of counter-proposals in this sub-region. Some counter-proposals suggested the splitting of wards between constituencies, these are detailed later in this report. The counter-proposals received that did not divide wards included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Conservative Party	BCE-51965	Whole region	Yes
Elizabeth Hart Angela Copland Sheena Carmichael Jane Bayliss Jonathan Stansby John Barnes Susan Mumford	BCE-42782 BCE-42786 BCE-47866 BCE-43092 BCE-43786 BCE-43818 BCE-43818 BCE-44007 BCE-45925 BCE-46054 BCE-47410	Bexhill and Battle, Eastbourne, Hastings and Rye, Lewes and Uckfield, Mid Kent and Ticehurst, Tunbridge Wells and Crowborough	No

			<b>1</b>
Tara Overton Graham Martin-Royle Mary Varall Rachel Hills Ann Bevan Irene Vesper Stephen Hardy Kevin Dixon Paul Coleshill Rother District Council Laurel Lindstrom Adrian Bailey Bexhill and Battle Conservatives Mabel Kent	BCE-47425 BCE-47433 BCE-47520 BCE-49339 BCE-49368 BCE-49804 BCE-49978 BCE-50139 BCE-50178 BCE-51017 BCE-51370 BCE-51423 BCE-51775		
Peter Hambly	BCE-43431	Bexhill and Battle, Brighton Kemptown and Seahaven, Eastbourne, Lewes and Uckfield	Yes
Chris Lilly	BCE-44265	Bexhill and Battle, Tunbridge Wells and Crowborough	No
James Hose	BCE-44635	Dover and Deal, East Thanet and Sandwich	Yes
Adrian Marshall	BCE-45075	Bexhill and Battle, Tunbridge Wells and Crowborough	No
Colin Toman	BCE-46246	Canterbury and Faversham, North Kent Coastal	No
Anne Marr	BCE-46799	Brighton Kemptown and Seahaven, Eastbourne	Yes
Mayfield and Five Ashes Parish Council	BCE-47002	Bexhill and Battle, Tunbridge Wells and Crowborough	No

Brenda Hopkin	BCE-47427		
Graham Williams	BCE-47406	Eastbourne, Lewes and Uckfield	No
Egerton Parish Council Geraldine Dyer Jennifer Als	BCE-47755 BCE-49568 BCE-49630	Ashford, Bexhill and Battle, Canterbury and Faversham, Mid Kent and Ticehurst	No
Tunbridge Wells Constituency Labour Party	BCE-50158	Mid Kent and Ticehurst, Tonbridge, Tunbridge Wells and Crowborough	Yes
Linda Livingstone	BCE-50665	Canterbury and Faversham, East Thanet and Sandwich, North Kent Coastal	No
Neil Harding	BCE-51197 BCE-51649	Bexhill and Battle, Brighton Kemptown and Seahaven, Brighton Pavilion, Eastbourne, Lewes and Uckfield, Mid Kent and Ticehurst, Tonbridge, Tunbridge Wells and Crowborough	No
Withdean Labour	BCE-51198	Bognor Regis and Littlehampton, Brighton Pavilion, East Worthing and Shoreham, Hove and Regency, West Worthing	Yes
Adrian Bailey	BCE-51373	Canterbury and Faversham, Dover and Deal, East Thanet and Sandwich, North	Yes

		Kent Coastal	
Sevenoaks Council	BCE-51931	Gravesham, Sevenoaks	No
Medway Labour group	BCE-51957	Chatham and The Mallings, Gillingham and Rainham, Rochester and Strood	Yes

- 25. The initial proposals for the constituencies in the areas of Brighton, Hove, Newhaven and Seaford were objected to. Assistant commissioners considered alternatives and put forward re-configured constituencies in this area as part of the revised proposals. The Conservative Party (BCE-51965) accepts the revised proposals for Brighton and Hove, and all but one constituency in East Sussex, although they note the less than ideal the splitting of Newhaven between constituencies. In Kent and Medway they suggest changes to Bexhill and Battle, Hastings and Rye, and Mid Kent and Ticehurst, in order to avoid crossing the East Sussex/Kent boundary at Ticehurst and Etchingham ward. Elizabeth Hart and others have put forward several possible solutions to this pattern of constituencies.
- 26. A number of representations received during the final consultation note that the revised proposals divide Newhaven between constituencies. Anne Marr (BCE-46799) seeks to avoid splitting Newhaven whilst keeping Seaford with either Newhaven, Lewes or Eastbourne but, under this final pattern, the Eastbourne constituency would not be within the permitted electorate range. Neil Harding (BCE-51197, BCE-51649) reiterated his earlier counter proposal (BCE-29013) to keep Lewes in a Brighton constituency, but seeking to add electors to Hove by extending the Hove constituency across the West Sussex boundary, and divide the existing Eastbourne constituency. Withdean Labour (BCE-51198) also suggest adding a Shoreham ward to the Hove constituency, in order to avoid including Regency ward, creating knock on effects along the West Sussex coast. Peter Hambly (BCE-43431) reiterated his earlier objection and counter-proposal (BCE-23288) to combining Lewes and Uckfield in one constituency, instead including Lewes in a Brighton constituency, and Seaford with Uckfield. Graham Williams (BCE-47406) would like to include East Dean in the Eastbourne constituency due to its proximity, contrary to the views of others who see it as a rural ward with more in keeping with a rural constituency. For example, East Dean and Friston Residents Association (BCE-51381) state "We are a rural community and our

interests are better served by Lewes as this constituency covers a large area of rural East Sussex. Eastbourne is a large town and rightly focused on town issues, but these are not those that affect us here in East Dean and Friston."

- 27. There were objections to to the boundary between the proposed Bexhill and Battle, and Tunbridge Wells and Crowborough constituencies. Chris Lilly (BCE-44265) seeks to produce a more regular shape for the Bexhill and Battle, and Tunbridge Wells and Crowborough boundary. Mayfield and Five Ashes Parish Council (BCE-47002) and Brenda Hopkin (BCE-47427) both seek to unite the parish council area within the Tunbridge Wells and Crowborough constituency. Adrian Marshall (BCE-45075) suggests some small changes to the Bexhill and Battle, and Tunbridge Wells and Crowborough boundary.
- 28. There was also opposition to the boundary between Tonbridge, and Tunbridge Wells and Crowborough, with representations objecting to the urban fringe of Tunbridge Wells being included in the Tonbridge constituency. For example, Speldhurst and Bidborough Ward, proposed to be included in Tonbridge, is opposed by Nigel Bourne (BCE-51567) who says "These areas are physically close to Tunbridge Wells and the residents feel very much part of the town and its surroundings." Tunbridge Wells Constituency Labour Party (BCE-50158) suggest returning to the initial proposals for Tunbridge Wells as the revised proposals detach several wards which are part of urban Tunbridge Wells and split the district between three proposed constituencies, whilst the initial proposals split it between two.
- 29. Apart from the the Conservative and Labour parties, there was little support for the revised proposals in North and East Kent. North Kent Coastal in particular, which splits Seasalter from Whitstable, was strongly opposed. Colin Toman (BCE-46246) would like to place Whitstable, Herne Bay and Canterbury in a single constituency, but this is not possible within the permitted electorate range. He does suggest that a lesser option would be to keep all of the North Kent coast together, as per the initial proposals. Linda Livingstone (BCE-50665) suggests Seasalter remains with Whitstable, but with a solution which does not meet the permitted electorate range. James Hose (BCE-44635) seeks a return to the initial proposals for the Dover and Deal, and East Thanet constituencies, in order to keep Sandwich and Wingham as part of the Dover and Deal constituency, as they are both part of Dover District Council. A number of residents of Little Stour and Ashstone ward, including Lynne Conolly (BCE-51959) and Jennifer Entwisle (BCE-51294), state that they should be linked with either Canterbury to the West or Sandwich to the East, as these are the towns with who they have

transport, cultural and economic ties, rather than to Dover, which they can only reach via Canterbury or Sandwich. Adrian Bailey (BCE-51373) suggests reverting to the initial proposals for East Thanet and Dover, with a choice of single ward adjustments.

- Egerton Parish Council (BCE-47755) and others such as Karen Saunders (BCE-46364) reiterated their suggestion from previous consultations that Egerton and Smarden parishes remain in an Ashford constituency, due to its proximity and local ties.
- 31. Sevenoaks District Council (BCE-51931) suggests including Hartley and Hodsoll Street ward in the Sevenoaks constituency, improving the coterminosity of the constituency, but provides no solution to keep Gravesham constituency within the permitted electorate range.
- 32. Medway Labour group (BCE-51957) provided a variation on their earlier counter proposal for the three Medway constituencies, which avoids putting Lordswood and Capstone ward into the Gillingham and Rainham constituency, which was opposed during the initial proposals, but which otherwise has no support beyond that single ward issue. The revised proposals in this area have been supported by campaigns received during the final consultation

### West Sussex

- 33. There were no major issues that drew objections in this sub-region, but neither was there any significant support other than from the Conservative and Labour parties.
- 34. In response to the consultation the Commission received a number of counter-proposals in this sub-region. No counter-proposals suggested the splitting of wards between constituencies. The counter-proposals received that did not divide wards included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
David Price	BCE-41788	Arundel and South Downs, Crawley,	No

		Horsham, Mid-Sussex	
Colin Barratt	BCE-42530	Horsham, Mid-Sussex	No
Withdean Labour	BCE-51198	Bognor Regis and Littlehampton, Brighton Pavilion, East Worthing and Shoreham, Hove and Regency, West Worthing	Yes
Oliver Raven	BCE-51762	Arundel and South Downs, Bognor Regis and Littlehampton, Chichester, Crawley, East Worthing and Shoreham, Horsham, Mid Sussex, West Worthing	Yes

- 35. There was no large scale objection to proposals in West Sussex, but a number of local issues were raised as part of counter proposals. David Price (BCE-41788) objects to Hassocks ward being included in the Arundel and South Downs constituency, considering it remote from where he lives. He suggests moving Hassocks ward to Mid Sussex, as Arundel is a significant distance, whilst the Mid Sussex constituency includes more of the Mid Sussex District Council, without fully considering the knock on effects. Colin Barratt (BCE-42530) seeks to include the Crawley Down and Turners Hill ward in the Mid Sussex constituency, as this is also part of the Mid Sussex District Council, but without resolving the knock on effects.
- 36. As mentioned previously, we have received some counter proposals to cross the Brighton and Hove, and West Sussex boundary. Withdean Labour (BCE-51198) and Oliver Raven (BCE-51762) have suggested changing the constituencies in West Sussex in order to formulate different patterns of constituencies in Brighton and Hove, and East Sussex.

## Buckinghamshire and Milton Keynes

- 37. The major issue that drew objections in this sub-region was:
  - The inclusion of the Milton Keynes Borough wards of Tattenhoe and Stony Stratford in the Buckingham constituency.
- 38. In response to the consultation the Commission received a number of counter-proposals in this sub-region. Some counter-proposals suggested the splitting of wards between constituencies, these are detailed later in this report. The counter-proposals received that did not divide wards included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Conservative Party	BCE-51965	Buckingham, Milton Keynes South West	Yes
Anonymous 13 year old	BCE-43545	Buckingham East Oxfordshire	No
Martin Fessey	BCE-45019	Beaconsfield Wycombe	No
Andrew Smith	BCE-48002	Buckingham Milton Keynes North East Milton Keynes South West South Northamptonshire	Yes
Alex Price	BCE-48440	Buckingham Milton Keynes North East Milton Keynes South West	No
lain Stewart MP	BCE-49887	Buckingham Milton Keynes South West	Yes

- 39. The Borough of Milton Keynes is too large for two constituencies within its boundaries and therefore, at least two of its wards must be included in a neighbouring constituency. Under the initial proposals, the Wolverton and Stony Stratford wards were included in the Buckingham constituency. After considering the representations, assistant commissioners recommended that the Stony Stratford and Tattenhoe wards be included in the Buckingham constituency. This proposal has been objected to during the final consultation.
- 40. The Conservative Party (BCE-51965) suggest we revert to the initial proposals for the two Milton Keynes wards to be included in the Buckingham constituency as these have been part of a Buckingham constituency prior to the fourth periodical review (1992), and accept the rest of the sub-region. Andrew Smith (BCE-48002), Alex Price (BCE-48440) and Iain Stewart, MP for Milton Keynes South (BCE-49887) all suggest crossing the boundary from Milton Keynes into Northamptonshire or Bedfordshire, to avoid moving two Milton Keynes wards to Buckingham, but by definition this still involves moving Milton Keynes wards to one or more non-Milton Keynes constituencies. The crossing of the region boundary was considered in formulating the revised proposals and it was noted at that time that crossing the region boundary did not provide for a better pattern of constituencies in either the Eastern or East Midlands regions.
- 41. An anonymised counter-proposal from a 13 year old (BCE-43545), whilst factually incorrect as it starts from the premise that Thame is divided by the Buckinghamshire/Oxfordshire boundary, who suggests a cross-county constituency, is noteworthy for the age of the respondent.

## Hampshire

- 42. The major issues that drew objections in this sub-region were:-
  - Moving Colden Common and Twyford ward, and part of Compton Otterbourne ward, from Winchester to Test Valley.
  - Moving Church Crookham, two wards from Hart District, from North East Hampshire to Aldershot.
  - Moving villages south and east of Andover from North West Hampshire to Test Valley.
  - Moving Chilworth, Nursling and Rownhams ward from Test Valley to New Forest East.
- 43. In response to the consultation the Commission received a number of counter-proposals in this sub-region. Some counter-proposals suggested the

splitting of wards between constituencies, these are detailed later in this report. The counter-proposals received that did not divide wards included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Chris Westall	BCE-41338	New Forest East, Test Valley, Winchester	Yes
Simon Ashby	BCE-41363	Basingstoke, North West Hampshire	No
Christopher Savell	BCE-43532	East Hampshire, Havant, Portsmouth North	No
Keith Winkworth	BCE-45532	Aldershot, North East Hampshire	No
Tony Bronk Jane Bronk	BCE-45712 BCE-45724	Portsmouth North, Test Valley, Winchester	Yes
Patrick Whittle	BCE-47627	Fareham, Havant, Portsmouth North	No
Chilworth Parish Council	BCE-50136	New Forest East, Test Valley, South West region	Yes

- 44. There was opposition locally to the inclusion of Colden Common and Twyford ward, and part of Compton Otterbourne in the Test Valley constituency. Chris Westall (BCE-41338) and Tony and Jane Bronk (BCE-45712, BCE-45724) suggest keeping Colden Common and Twyford in a Winchester constituency to maintain local community ties by moving wards on the far South East of the proposed constituency to Portsmouth North, whilst not recognising that this would leave the Test Valley and/or New Forest East constituencies outside the permitted electorate range.
- 45. There was opposition, as during the consultation on the initial proposals, to the inclusion of Church Crookham in an Aldershot constituency. Respondents considered this separated the area from Fleet. Keith Winkworth (BCE-45532)

suggests including all of Fleet, including Church Crookham, in an Aldershot constituency, but makes no mention of areas beyond these.

- 46. There was opposition to the exclusion of villages south and west of Andover being excluded from the North West Hampshire constituency for example, Alice Coffey (BCE-51834) "I live in Abbotts Ann which is only three miles away from Andover" and Gordon Verity (BCE-41978) "I prefer to be in the same constituency as Andover, 6 miles away. Romsey is too far away, 20 miles, a place that people in Kimpton would never visit on a regular basis. We have a bus connection with Andover, it is our nearest shopping centre and nearest railway station." This is similar opposition as to the initial proposals, but no specific counter-proposals was received during the final consultation.
- 47. There were a small number of representations about the villages around Basingstoke being in a different constituency. Simon Ashby (BCE-41363) was alone in suggesting adding wards around Tadley to a Basingstoke constituency, and splitting the Basingstoke constituency, without resolving any knock on effects.
- 48. Christopher Savell (BCE-43532) suggests keeping Waterlooville united within the Havant constituency, but without dealing with the impact to East Hampshire and Portsmouth North. Patrick Whittle (BCE-47627) argues for something similar, making some attempt to resolve the knock on effects.
- 49. Chilworth Parish Council (BCE-50136) object to being included in the New Forest East constituency, but their solution pushes the New Forest constituencies into Wiltshire. The assistant commissioners considered similar options at an earlier stage and concluded that this did not help with creating good constituencies within the South West region.

### Isle of Wight

- 50. The main issue that drew objection in this sub-region was:-
  - Including East Cowes ward in the Isle of Wight West constituency.
- 51. In response to the consultation the Commission received a number of counter-proposals in this sub-region. No counter-proposals suggested the splitting of wards between constituencies. The counter-proposals received that did not divide wards included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
John Hounslow	BCE-41355	Isle of Wight East Isle of Wight West	Yes
Roger Crew	BCE-41389	Isle of Wight East Isle of Wight West	Yes
Gary Eldridge	BCE-42067	Isle of Wight East Isle of Wight West	Yes
Joanne Sturmey	BCE-42619	Isle of Wight East Isle of Wight West	Yes
I Bond	BCE-44784	Isle of Wight East Isle of Wight West	Yes

52. All of these suggestions are variations on how to include East Cowes in the Isle of Wight East constituency, rather than Isle of Wight West, as in both the initial and revised proposals. Most respondents who commented on this consider that the River Medina divides East Cowes from West Cowes, and that East Cowes looks towards Ryde.

## Oxfordshire

- 53. The major issue that drew objections in this sub-region was:-
  - Separating those parts of Bicester which lie outside its ring road, and local villages in the vicinity.
- 54. In response to the consultation the Commission received a number of counter-proposals in this sub-region. Some counter-proposals suggested the splitting of wards between constituencies, these are detailed later in this report. The counter-proposals received that did not divide wards included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
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Layla Moran	BCE-50456	Abingdon and Oxford North Oxford	No
Jonathan Rabbitt	BCE-50484	Abingdon and Oxford North Oxford	No
John Howson Judy Roberts Helen Pighills	BCE-50557 BCE-51026 BCE-51436	Abingdon and Oxford North Oxford	No
Jane Olds	BCE-51313 BCE-51549	Banbury Bicester East Oxfordshire South Northamptonshire	Yes

- 55. We received opposition to the specific ward to use to divide Oxford from Abingdon and Oxford North, with some feeling that including North ward in Abingdon and Oxford North would produce an improved solution for the Summertown area of Oxford. The counter-proposals for Abingdon and Oxford North, and Oxford, provide alternatives for dividing the city, some just with a single ward swap, others seeking to provide a different pattern, such as Jonathan Rabbit (BCE-50484) objects to what he sees as the artificial conjoining of Abingdon and Oxford North and seeks to provide a better solution by including closer southern Oxford wards with Abingdon rather than more distant northern wards.
- 56. There was opposition to the inclusion of wards close to Bicester in the East Oxfordshire constituency. Jane Olds (BCE-51313, BCE-51549) seeks to resolve the edge issues around Bicester by adding South Northamptonshire wards to the Banbury constituency, allowing Bicester to be combined with East Oxfordshire wards. This was considered at an earlier stage by the commission, when it was concluded that an exceptional case had not been made, and that a cross region solution did not provide any better constituencies in the East Midlands region.

### Counter-proposals - that divided wards

57. As suggested above, some counter-proposals were received which suggested the dividing of wards between constituencies, these included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Ward(s) to be divided and reason	Similar counter-proposal received and considered at initial proposals?
Nigel Petter	BCE-45887	Newbury, Reading West	Bucklebury To keep those parts closest to Newbury within the constituency	No
Peter Kingswood	BCE-51966	Bracknell, Windsor	Crown Wood Harmans Water To preserve parish boundaries	No
Richard Lowe	BCE-41547 BCE-41554	Runnymede and Weybridge, Spelthorne	Egham Hythe To attach Thorpe ward to Spelthorne constituency Weybridge Riverside Ward boundary does not follow Thames accurately enough	No
Adrian Bailey	BCE-51368	Brighton Kemptown and Seahaven, Brighton Pavilion, Lewes and Uckfield	Queen's Park, to avoid splitting Newhaven between two constituencies, and detaching the eastern end of the	Yes

			Brighton Kemptown and Seahaven constituency, creating two more coherent constituencies within the sub region.	
Wealden District Council	BCE-51427	Bexhill and Battle, Eastbourne, Lewes and Uckfield, Tunbridge Wells and Crowborough	Buxted and Maresfield, Hartfield New ward boundaries to avoid confusing electors. Incomplete solution.	No
Oliver Raven	BCE-51762	Bexhill and Battle, Brighton Kemptown and Seahaven, Brighton Pavilion, Hove and Regency, Eastbourne, Lewes and Uckfield, Tunbridge Wells and Crowborough	Alfriston, Willingdon Better community and transport links	No
John Gladwin	BCE-44161	Chesham and Amersham Wycombe	Greater Hughenden, to bring Great Kingsmill into one constituency	No
Thomas Humble	BCE-42459	Milton Keynes North East Milton Keynes South West	Confused as to which wards to be split, little justification given	No
Compton and	BCE-49112	Test Valley,	Compton and	Yes

Shawford Parish Council Martin Nancekievill Adrian Walmsley	BCE-49819 BCE-51204	Winchester	Otterbourne. To maintain ties to Winchester.	
Richard Ross	BCE-46327	Abingdon and Oxford North East Oxfordshire	Sandford & the Wittenhams To bring Abingdon Town Football Club and Abingdon Vale Cricket Club within the constituency	No
John Howson	BCE-50557	Abingdon and Oxford North Oxford	North Ward To avoid splitting St Margaret's electoral division	No

## Alternative constituency names

58. As always, the naming of the proposed constituencies has proved to be a contentious issue. Many representations do not object to the proposed boundaries of constituencies, but suggest alternative names. Some responders, such as Edward Keene (BCE-50148), suggest a number of alternative names. Where alternative names result from changes proposed in the counter-proposals, these have not been listed below. Some of the alternative names suggested for constituencies for which no change in their composition is proposed are as follows:-

Proposed constituency name	Alternative names	Evidence for alternative name
Newbury	West Berkshire	Jeremy Wheeler (BCE-41277) Most of local authority, but not coterminous
Wokingham	Mid Berkshire	Jeremy Wheeler

	South Berkshire	(BCE-41277) Wokingham at far east of constituency, meaning those in west feel little connection to it.
Reading West	Berkshire Thames Pangbourne Reading West and West Berkshire	John Chapman (BCE-43429) Thames runs through it, and it includes Pangbourne as a smaller part than Reading Alok Sharma MP (BCE-51654) To reflect move of the constituency further West.
South West Surrey	Waverley	Harry Hayfield (BCE-42868) Includes local authority, but not coterminous
Mole Valley	Dorking and Leatherhead	Edward Keene (BCE-50148) Most of the constituency is far from the river.
Surrey Heath	Camberley	Edward Keene (BCE-50148) To reflect largest town.
Chatham and The Mallings	Chatham and Aylesford	Christopher Nickless (BCE-42707) asserts that East and West Malling aren't referred to collectively in the plural. Perhaps as the constituency extends this far, make it Chatham and Malling, as this construct is also used by a local school
Mid Kent and Ticehurst	Weald of Kent and Ticehurst	Imogen Wedd (BCE-43853) The middle of Kent is known as The Weald, but this name also refers to areas beyond the constituency.

Mid Kent and Ticehurst	West Kent	Chantal Brooks (BCE-46134) No reason given
Lewes and Uckfield	Lewes and Hailsham Lewes and Lower Weald Lewes and West Wealden Hailsham, Lewes and Uckfield	Alan Hillman (BCE-47474) Douglas Murray (BCE-51635) Hailsham is larger than Uckfield
Folkestone and Hythe	Folkestone, Hythe and Romney Marsh Folkestone and Romney Marsh	Catherine Newcombe (BCE-47759) Romney Marsh is larger than Hythe
Sevenoaks	Sevenoaks and Swanley	Sir Michael Fallon MP (BCE-49107) Swanley is a significant second town
Hove and Regency	Hove and Portslade	Trevor Harvey (BCE-49203) Regency is a ward name, whilst Portslade is a significant region within the constituency.
Tunbridge Wells and Crowborough	Crowborough and Tunbridge Wells	Wealden District Council (BCE-51427) Majority of Wealden wards (but Tunbridge Wells still larger than Crowborough)
Chesham and Amersham	The Chilterns	Cheryl Gillian MP (BCE-43476) Includes local authority, but not coterminous
Buckingham	Buckingham and Milton Keynes West	Iain Stewart MP (BCE-49887) To reflect addition of two MK wards
Aldershot	Farnborough and Aldershot	Donna Wallace (BCE-42960) Farnborough is larger
Test Valley	Romsey West Hampshire	David Hogger (BCE-43284) Jackie Porter (BCE-51585)

		Revised proposal is not coterminous with Test Valley District.
Abingdon and Oxford North	Abingdon and Summertown	Edward Keene (BCE-50148) Summertown is the main commercial/shopping area in this part of Oxford
Banbury	Banbury and Bicester	James Doble (BCE-51526) Two main centres
East Oxfordshire	Henley and Thame	Chris Connolly (BCE-47771) Two largest towns in the constituency
Wantage	South West Oxfordshire Didcot Southern Oxfordshire	Jeremy Rogers (BCE-42466) Graham Holliday (BCE-45658) More encompassing of the area
Witney	West Oxfordshire	Duncan Enright (BCE-43701) More encompassing of the area

## How to view representations in the portal

59. Commissioners have been provided with login details that allow you to view all of the representations in the portal, download and view attachments.



# **COMMISSIONERS' INFORMATION PACK**

## SOUTH WEST REGION

# FINAL RECOMMENDATIONS

## February 2018

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## Common national issues

1. We received over 35,000 representations across the country over the three consultation periods. Of these, approximately 10,700 were received in response to the consultation on the revised proposals. The spread of representations has not been even across the country. Representations received for each region are broken down in the table below. In addition, we have also received a number of petitions and writing campaigns during the final consultation. The total number of writing campaigns and petitions for each region is also provided in the table below.

Region	Consultation on revised proposals	Total representations	Total - petitions/ writing campaigns
East Midlands	421	2,048	6
Eastern	777	2,806	11
London	2,390	11,764	28
North East	540	1,968	7
North West	987	4,040	18
South East	2,511	5,438	26
South West	952	2,971	3
West Midlands	1,095	3,200	8
Yorkshire and the Humber	1,076	3,059	14
TOTAL	10,749	37,294	121

- In every region we have received representations that have not commented on specific boundaries, put forward alternatives or commented on names. These representations have largely focused on the following issues:
  - Opposition to the reduction in the number of MPs/constituencies
  - Opposition to having constituencies of equal size
  - Opposition to the use of the December 2015 electoral data
  - Opposition to using ward boundaries from May 2015
  - Concerns that the proposed boundaries reflect a political bias
  - Opposition to the proposals crossing county boundaries

- 3. We have not received regional-wide counter-proposals for every region in response to our revised proposals published in October 2017. In most cases, counter-proposals received during this consultation have been localised and focused on modifications to a small number of constituencies rather than across the entire region. These counter-proposals have been received from the central and local offices of the political parties, some politicians, and some individual members of the public. The central offices of the Conservative Party and Labour Party have made representations for all nine regions. The central offices for the other political parties did not submit a representation for each region, but in most cases the local offices have done so.
- 4. In some regions we have received counter-proposals that suggest dividing wards between constituencies. Details of these for this region are also provided later in this document.
- 5. Representations have also been received that comment only on the proposed names of constituencies. In some cases these have been localised comments; however, we have also received representations that have specifically commented on the Commission's approach to naming constituencies - i.e. length of name, cities/towns used in the constituency name and geographical context e.g. north/south.

## South West regional information

#### Number of representations received

6. In the South West, the Commission received a total of 952 representations during consultation on the revised proposals. In total the Commission received 2,971 representations for this region. There were also a number of duplicate representations within this total, as well representations that made general comments that did not have any bearing on the substance of the initial or revised proposals.

7.	The Commission received representations from the following respondents:

Type of respondents	Consultation on revised proposals	Total number of representations
Member of Parliament	6	48
Official political party response	5	16
Peer from House of Lords	0	0
Local councillor	43	197
Local authority	3	19
Parish or town council	11	71
Other organisation	8	64
Member of the public	876	2,556
Total	952	2,971

### Campaigns

8. No campaigns were received for the South West region during consultation on the revised proposals. During the previous consultations the Commission received three campaigns in relation to the South West region.

### Political party representations

9. Of the four main political parties, two have submitted detailed responses. The Labour Party (BCE-51850) welcomed the revised proposals, particularly in Bournemouth, Poole and Dorset. It opposed the Commission's proposal to

move the Exeter City ward of St. Loyes from East Devon to the Exeter constituency and have submitted a counter-proposal that retains the ward in the existing East Devon constituency. The Labour Party also proposed an alternative name for the proposed Yeovil and South Somerset constituency, preferring its current name of 'Yeovil'.

- 10. The Conservative Party (BCE-51613) supported all 53 proposed constituencies. The only suggested amendment was to change the name for the proposed Bournemouth West constituency to 'Bournemouth West and Bourne Valley'.
- 11. No counter-proposals were received from anyone claiming to speak on behalf of the central offices of the Liberal Democrat Party, the Green Party or UKIP.
- 12. Counter-proposals were also received from local branches of the political parties, some of which offer alternatives and variations to those submitted by the national representatives of their parties. The Torbay Liberal Democrat Party (BCE-50470) supported the Commission's revised proposals for Torbay. However, the party also submitted a counter-proposal aligning the Torbay constituency ward boundaries with the wards currently under review by the Local Government Boundary Commission for England.

### Sub-regions and counter-proposals that propose alternative sub-regions

- 13. The revised proposals were constructed on the sub-regions of:
  - Bath and North East Somerset, and Somerset
  - North Somerset
  - Bournemouth, Dorset, Poole, and Wiltshire
  - Bristol
  - Cornwall, Devon, Isles of Scilly, Plymouth, and Torbay
  - Gloucestershire, and South Gloucestershire
  - Swindon
- 14. The following counter-proposals have been received that cover either the whole region, a sub-region, or cross the South West and South East regional boundary. We recommend you take time to familiarise yourself with these representations:

Organisation or Individual	ID Numbers	Affected sub-regions
Oliver Raven	BCE-51797	Whole region
Alison Finlay (Chilworth Parish Council)	BCE-50136	Hampshire (South East region) Bournemouth, Dorset, Poole and Wiltshire

- 15. Oliver Raven proposed an alternative whole region scheme, which included two split ward solutions; splitting the South Gloucestershire District ward of Boyd Valley and the North Dorset District ward of Hill Forts. He reiterated his counter-proposal for Wiltshire, submitted during the initial proposals, and suggested substantial changes to Dorset. He also confirmed his support for the proposed boundaries for the sub-regions of Devon and Cornwall, Somerset and Bristol.
- 16. Chilworth Parish Council proposed that Hampshire be included in a sub-region with Wiltshire, crossing the South West/South East regional boundary. The Parish submitted its counter-proposal in an attempt to keep the ward of Chilworth, Nursling and Rownhams in the South East region constituency of Test Valley. Commissioners should note paragraph 20 (page 6) of the 'Guide to the 2018 Review of Parliamentary constituencies', which states that there would need to be 'very compelling reasons' for the Commission to depart from the region based approach to the current review.
- 17. All other representations have not proposed alternative sub-regions.

## Detailed analysis within sub-regions.

## Bath and North East Somerset, and Somerset

- 18. The major issues that drew objections in this sub-region were:
  - Somerton and Frome constituency: opposition to Frome remaining in its current constituency of Somerton and Frome.
- 19. In the initial proposals, the constituency of Somerton and Frome lost the Ammerdown, and Coleford and Holcombe wards to the North East Somerset constituency. These wards joined four wards from the existing Wells constituency, bringing the town of Shepton Mallet into the proposed North East Somerset constituency. The revised proposals were unchanged from the initial proposals.

20. Residents of Frome asserted that they look to Bath, east Somerset and/or Wiltshire, not south towards Somerton. Sue Plummer (BCE-49359) commented that 'Frome is a thriving and expanding town, well connected with Bath, Bristol, Trowbridge, Warminster etc - politically, job wise, for shopping and entertainment. Frome belongs either in BANES or Wiltshire'. Martin Dimery (BCE-42180), local Councillor for Frome East, stated that Frome's 'geographical and cultural associations are with the neighbouring areas of Radstock, Midsomer Norton, Bath and also into West Wiltshire - Trowbridge, Westbury and Warminster. Logically, Frome might be part of the same constituency as some of the above. Alternatively, Frome may be conjoined with its neighbouring Mendip District towns of Shepton Mallet, Wells and Glastonbury'.

### Bournemouth, Dorset, Poole, and Wiltshire

- 21. The major issues that drew objections in this sub-region were:
  - West Wiltshire, and North Wiltshire constituencies: objection to dividing the Parish of Box;
  - Mid Dorset and Christchurch constituencies: opposition to splitting the town of Verwood between the proposed Mid Dorset and Christchurch constituencies.
- 22. In response to the consultation the Commission received a number of counter-proposals in this sub-region. The counter-proposals that did not divide wards included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Julie Saunders	BCE-45990	Mid Dorset, and Christchurch (would be invalid as outside of the electorate range)	No

23. Box Parish Council (BCE-44753) submitted a representation in opposition to the division of the parish between the West Wiltshire and North Wiltshire constituencies. However, it did not provide an alternative counter-proposal. Under the initial proposals, Corsham Pickwick, and Corsham Town wards were included in the proposed North Wiltshire constituency leaving the rest of Corsham (Corsham Without and Box Hill ward) in the West Wiltshire constituency. The Corsham Without and Box Hill ward contains parts of both the Box Parish Council and the Corsham Town Council areas. Submissions were received in opposition and the initial proposals were revised to retain the whole of Corsham in one constituency (West Wiltshire). The revised proposals for Corsham received support during the revised proposals public consultation.

- 24. The Commission also received support for the constituencies of West Wiltshire, and North Wiltshire in particular around the town of Chippenham. Respondents supported the inclusion of Corsham, Melksham and Trowbridge within a single constituency, and the inclusion of Chippenham in North Wiltshire. Corsham Town Council (BCE-46067) confirmed its support for the names of both West Wiltshire and North Wiltshire constituencies.
- 25. The Commission received substantial support for both the revised Bournemouth East, and Bournemouth West constituencies. The representations received in the initial proposals for these two constituencies had been overwhelmingly in opposition. It was considered that the initial proposals were far too disruptive to the current pattern of Parliamentary constituencies in this area. Accordingly, the revised proposals made substantial amendments in the Bournemouth, Poole and Mid Dorset areas to more closely reflect the existing pattern of Parliamentary constituencies. The current boundaries for both Bournemouth constituencies were retained, with the only amendment for Bournemouth being the inclusion of the Branksome ward in the Bournemouth West constituency rather than Poole; this was very well received with substantial support.
- 26. Councillor Lynda Price (BCE-51554 and BCE-31309) originally made a submission during the first public consultation to express her objection to the initial proposals for the Bournemouth area. She subsequently submitted a representation after considering the revised proposals, and confirmed that 'I and my residents are pleased that the initial proposals have been dropped, I am in agreement with the revised proposals and wholly in support of their adoption'.
- 27. Bernard Uzzell (BCE-43823) fully supported the revised proposals in the Bournemouth area. He supported the minimal change approach taken and went on to say 'The local urban community in which we live in Bournemouth East will remain connected to similar, nearby communities such as Littledown, Boscombe and Southbourne and the economic development needs of

Bournemouth are represented by just two MPs. Further, Bournemouth University, a key asset to the area, remains within one constituency (Bournemouth West, for which it represents a very high priority).'

- 28. Conor Burns (BCE-49345), Member of Parliament for Bournemouth West, also warmly welcomed the revised proposals. He supported the inclusion of the Poole Borough ward of Branksome West in the proposed Bournemouth West constituency, (bringing together the Branksome East and Branksome West wards into one constituency) and would also result in the whole of the Bourne Valley being contained within the Bournemouth West constituency. Mr Burns put forward a proposal to change the constituency name to 'Bournemouth West and Bourne Valley' to reflect the inclusion of three wards from Poole Borough into the proposed Bournemouth West constituency.
- 29. The Commission received one counter-proposal in relation to the constituencies of Bournemouth West and Poole from Clive Bowen (BCE-42548). He is opposed to the ward of Alderney being retained in its current constituency of Bournemouth West. He suggested that the Alderney ward should be split and that the boundary between Poole and Bournemouth West should run along Wallisdown Road to Wallisdown roundabout and then south along Alder Road down to Branksome, which he considered was a more natural division. This counter-proposal produces a constituency outside of the permitted electorate range.
- 30. The Commission received a small amount of opposition to the town of Verwood being divided between the proposed Mid Dorset constituency and Christchurch constituency. Julie Saunders (BCE-45990) submitted a counter-proposal requesting that the whole of Verwood be placed in the Christchurch Constituency. This counter-proposal is outside of the permitted electorate range.

### Bristol

- 31. There were no major issues that drew objections in this sub-region. However, one counter-proposal was received.
- 32. In response to the consultation the Commission received a counter-proposal in this sub-region as follows:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Stephen Lloyd	BCE-43362	Bristol East, and Bristol West (invalid - outside of the electoral range)	Yes

33. The counter-proposal from Stephen Lloyd (BCE-43362) sought to avoid the Easton and Lawrence Hill wards being included in different constituencies. The Commission should be aware that ward boundaries in the City of Bristol have changed since the beginning of the review and that this has been objected to by Councillor Tom Brook (BCE-41620), who has highlighted new wards that would be split by the proposed constituency boundaries.

## Gloucestershire, and South Gloucestershire

- 34. The major issues that drew objections in this sub-region were:
  - Tewkesbury and Gloucester constituencies: objection to the Gloucester City wards of Elmbridge and Longlevens being included in the Tewkesbury constituency instead of the Gloucester constituency;
  - Dursley, Thornbury and Yate, and Stroud constituencies: the Commission received opposition to the wards of Cam West, Cam East, and Dursley being included in the proposed Dursley, Thornbury and Yate constituency during both the initial and revised proposals.
- 35. In response to the consultation the Commission received a number of counter-proposals in this sub-region. The counter-proposals received that did not divide wards included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Roger Claydon	BCE-41510	Stroud, and Dursley, Thornbury and Yate - the inclusion of the Wotton-under-Edge ward	No

		in the Yeovil constituency from Dursley, Thornbury and Yate (would be invalid as outside of the electorate range)	
Major Tom Hancock	BCE-51936	Gloucester, Tewkesbury, Forest of Dean, and The Cotswolds constituencies (would be invalid as outside of the electorate range)	No
Cllr Jeremy Hilton	BCE-50863	Gloucester, and Tewkesbury - objection to the revised proposals for the Gloucester and Tewkesbury constituencies. Reiterates support for the division of Gloucester in the initial proposals. Suggests two new constituencies (Gloucester North and Gloucester South) be created, but the counter-proposal would be invalid as there are no details of how such a division could be created.	No
Mary Leonard (Kingswood Parish Council)	BCE-49816	The Cotswolds, Dursley, Thornbury and Yate, Stroud- including the Kingswood ward in the Stroud constituency is within the electoral range, however this would create a constituency with detached parts and would therefore be invalid. The inclusion of the Kingswood ward in The Cotswolds constituency is within the electorate range.	Yes

			1
Andrew Watt	BCE-49531	Stroud, The Cotswolds, and Dursley, Thornbury and Yate (would be invalid as outside of the electorate range)	No
Laurence Robertson (Member of Parliament for Tewkesbury)	BCE-49508	Forest of Dean, Tewkesbury, and Gloucester (would be invalid as outside the electorate range and Elmbridge ward becomes a detached ward)	No
Wanda Lozinska	BCE-46541	Stroud, The Cotswolds, and Dursley, Thornbury and Yate (would be invalid as outside of the electorate range)	No
Mark Nurse	BCE-46384	Stroud, The Cotswolds, and Dursley, Thornbury and Yate (would be invalid as outside of the electorate range)	No
Sue Simmons (Westerleigh Parish Council)	BCE-45304	Filton and Bradley Stoke, and Dursley, Thornbury and Yate (would be invalid as outside of the electorate range)	No
Simon Bilous	BCE-42216	Stroud, The Cotswolds, and Dursley, Thornbury and Yate (would be invalid as outside of the electoral range)	Yes
Garry Strudwick	BCE-50351	Stroud, The Cotswolds, and Dursley, Thornbury and Yate (would be invalid as outside of the electorate range)	No

- 36. Under the initial proposals, both the Elmbridge and Longlevens wards were included in the Gloucester constituency, and to the south, the Quedgeley Severn Vale and Quedgeley Fieldcourt wards were included in the Stroud constituency. During the first and second public consultations, respondents objected to the inclusion of the two Quedgeley wards in the Stroud constituency. After careful consideration of the representations received, the initial proposals were amended to include both Quedgeley wards in the Gloucester constituency, and include the Elmbridge ward and Longlevens ward in the Tewkesbury constituency. At present the Longlevens ward is included in the existing Tewkesbury constituency.
- 37. During the consultation on the revised proposals many respondents objected to the Elmbridge and Longlevens wards being included in the Tewkesbury constituency. Councillors Howard Hyman and Emily Ryall of Gloucester City Council (BCE-44281) stated 'The people of Elmbridge identify with Gloucester not with Tewkesbury. There is more of an argument for Longlevens to be returned to Gloucester than for this proposal. Longlevens, which identifies with Gloucester, has Gloucester City councillors and a Tewkesbury MP. A lot of people consider this to be bizarre'. Although Councillors Hyman and Ryall also confirmed their support for the Quedgeley wards reverting back to Gloucester, they did not provide a counter-proposal in relation to an alternative solution for this sub-region.
- 38. Similarly, as in the consultation on the initial proposals, respondents objected to the towns of Cam and Dursley being included in the Dursley, Thornbury and Yate constituency. Respondents considered that these proposals break close ties with the town of Stroud and with the neighbouring Coaley and Uley ward in the Stroud constituency. The representations supported the towns of Cam and Dursley being included in a constituency with the town of Stroud. Christine Stockwell (BCE-51177) emphasised the history and connection between Stroud and other market towns in the vicinity, especially Nailsworth, Stonehouse, Dursley and Cam and the rural communities that link them. She stated 'In my opinion these areas should remain within the Stroud constituency. They strongly identify with, and are served by Stroud District Council and this is important to their identity and to us in the wider community of Stroud District. The current proposals to remove Cam and Dursley from the Stroud constituency disrupts their relationship with local councillors and their MP and complicates things unnecessarily re dealing with different democratic authorities'.
- 39. David Drew (BCE-51606), Member of Parliament for the Stroud constituency, stated as part of his representation that 'Cam and Dursley are closer to Stroud

than they are to Thornbury and Yate. What's more, they are in the heart of the area covered by Stroud District Council – not that of South Gloucestershire, where Thornbury and Yate lie. If voters are to feel properly represented by those they elect to parliament, there should be some administrative cohesion between the area where they live and the seat of their elected representative'. He also welcomed the inclusion of the ward of Minchinhampton into the Stroud constituency.

- 40. The assistant commissioners investigated alternative patterns of constituencies for Gloucestershire when constructing the revised proposals and noted that the electorate of the local authority of Stroud was too small for two constituencies and too large for one constituency. Therefore, they concluded that part of the district would have to be included in a neighbouring constituency.
- 41. During the process of configuring the initial proposals, it was noted that to no longer include the Coombe Hill ward in the existing Tewkesbury constituency would have resulted in that constituency having two detached parts. Therefore, under the initial proposals, the Cheltenham borough ward of Springbank was included in the Tewkesbury constituency. During the first and second public consultations there was considerable opposition to this proposal including a petition objecting to the inclusion of the Springbank ward in the Tewkesbury constituency (BCE-33207). In an attempt to address this issue, the Commission adopted a counter-proposal from the Pirate Party UK (BCE-31942) to split the Coombe Hill ward between the proposed Forest of Dean and Tewkesbury constituencies, thereby allowing the Springbank ward to remain in the Cheltenham constituency. Cheltenham would therefore be an unchanged constituency.
- 42. In relation to the Commission's revised proposals, Laurence Robertson (BCE-49508), Member of Parliament for Tewkesbury, objected to this proposal and put forward an alternative solution. However, this would be invalid, as noted above. Apart from this submission, the Commission received no other significant support or objection for this split ward proposal.

#### Cornwall, Devon, Isles of Scilly, Plymouth, and Torbay

- 43. The major issues that drew objections in this sub-region were:
  - Exeter, and East Devon constituencies: there has been both opposition to and support for the Exeter City ward of St. Loyes being included in the

Exeter constituency, rather than in East Devon where it is currently located;

- Bideford, Bude and Launceston constituency: there continues to be considerable opposition to this proposed cross-county constituency as it combines wards from both the counties of Devon and Cornwall.
- 44. In response to the consultation the Commission received the following counter-proposals in this sub-region that did not divide wards:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Labour Party	BCE-51850	East Devon, and Exeter	Revert to initial proposals
Laura Horner	BCE-44282	Exeter, and East Devon (would be invalid as outside of the electorate range)	No
Rowan Hodgson	BCE-41889	Central Devon, and Exeter - would be invalid as Duryard ward becomes a detached ward	No

- 45. Under the initial proposals, Exeter was an unchanged constituency, with respondents supporting both the Exeter and East Devon constituencies, noting that the initial proposals for this area was a minimum change option. However, representations were submitted proposing that the City of Exeter ward of St. Loyes ward should be included in the Exeter constituency. The assistant commissioners visited this area to test evidence received during the public consultations. Due to the strength of evidence, the assistant commissioners proposed that the St. Loyes ward should be included in the Exeter constituency as part of their recommendations.
- 46. The Commission received more opposition than support for its revised proposals in this area. Opposition included Andy Hannan (BCE-50285), former Devon county councillor, who cited population growth, the topography between some areas St. Loyes ward currently borders and the strong link between Topsham ward and St. Loyes ward as reasons why St. Loyes ward

should 'revert back' to East Devon. He made the point that 'a change of this magnitude should not be made unless there is a very strong case in its favour, which is clearly not the case since the Commission itself admits that the argument is 'finely balanced' between its original proposals and the revised one'. Respondents, such as Ben Bradshaw (BCE- 47758), Member of Parliament for Exeter, raised concerns regarding the Topsham Ward becoming an 'orphan ward' as a result of being separated from St. Loyes ward. The Labour Party (BCE-51850) strongly opposed the revised proposals and stated '...There is no reason under the statutory criteria to make this change. No ties have been broken, Exeter BC would remain composed of parts of one local authority and East Devon two, and the changes amend existing constituencies when they could remain unchanged'. Opponents of the revised proposals urged the Commission to 'revert back' to its initial proposals for Exeter and East Devon.

- 47. Under the initial proposals, it was not possible to propose constituencies with electorates within 5% of the electoral quota in this sub-region within the County of Cornwall and the Isles of Scilly. Therefore, it was necessary to identify the most appropriate point at which to cross the River Tamar. After careful consideration, it was decided that the north of both counties would be where the Commission would propose the cross-county boundary (rather than the south where the River Tamar is at its widest) and created a constituency named 'Bideford, Bude and Launceston', reflecting the names of the three largest towns in the proposed constituency. During the public consultations the Commission received many objections to the creation of a so-called 'Devonwall' cross-county constituency.
- 48. Many of the representations requested that the Commission treat Cornwall as a separate sub-region, although this would result in at least one constituency with an electorate outside of the 5% threshold. Androw Hawke (BCE-51784), on behalf of the Cornish Nationalist Party, urged the Commission to '...rethink this proposal to allow an MP to represent part of Devon and part of a Celtic Nation. It's not right for the Cornish electorate who are a recognised peoples and not fair for the Devon electorate either. Both areas are culturally different, historically different and both sides would not gain from sharing a cross-border MP. Cornwall's voice at the British Parliament needs to be from MPs elected for and from Cornish constituencies'.
- 49. The Commission received no viable counter-proposals suggesting an alternative crossing of the river Tamar.

## Swindon

- 50. There were no major issues that drew objections in this sub-region. The Commission received one counter-proposal for this sub-region.
- 51. In response to the consultation the Commission received a counter-proposal in this sub-region as follows that did not divide wards:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Mary Martin	BCE-41830	North Swindon, and South Swindon	No

52. Mary Martin (BCE-41830) suggested that the current constituency boundary for South Swindon, and North Swindon should be followed in the west, and the communities of Nythe and Covingham along the Parish Council boundaries should be included in the South Swindon constituency. This counter-proposal would result in the electorates of both the North Swindon and South Swindon constituencies being within the permitted electorate range.

### Counter-proposals - that divided wards

53. As suggested above, some counter-proposals were received which suggested the dividing of wards between constituencies, these included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies/Ward(s) to be divided and reason	Similar counter-proposal received and considered at initial proposals?
Oliver Raven	BCE-51797	Christchurch; Mid Dorset; and Warminster and Shaftesbury. Boyd Valley and Hill Forts wards.	No
Geoff	BCE-49230	Stroud; and Dursley,	No

Wheeler (Stroud Labour Party)		Thornbury and Yate. Dodington ward - the rural part of Dodington ward should be included in the Kingswood constituency. (would be invalid as outside of the electoral range)	
Jim Goodey	BCE-42451	South Dorset; and West Dorset Includes Broadmayne & Crossways ward in South Dorset and Winterbourne St. Martin ward in West Dorset. Splits a ward to avoid the community of Littlemore being in two constituencies in the future	No
Clive Bowen	BCE-42548	Bournemouth West, and Poole. Suggests splitting the Alderney ward as a more natural division (would be invalid as outside of the electorate range)	No

## Alternative constituency names

54. As always, the naming of the proposed constituencies has proved to be a contentious issue. Many representations do not object to the proposed boundaries of constituencies, but suggest alternative names. Some responders, such as Edward Keene (BCE-51389), suggest a number of alternative names. Where alternative names result from changes proposed in the counter-proposals, these have not been listed below. Some of the alternative names suggested for constituencies for which no change in their composition is proposed are as follows:

Proposed constituency name	Alternative names	Evidence for alternative name
Bournemouth West	Bournemouth West and	BCE-49345 (Conor Burns

	Bourne Valley	MP); BCE-51613 (Conservative Party) A more inclusive name for this constituency by reflecting the Poole identity within the constituency
Bournemouth West	Bourne Valley & Kinson	BCE-44762 (Anthony Trent) More reflective of the area the constituency spans
Yeovil and South Somerset	Yeovil	BCE- 51850 (Labour Party) The Yeovil and Somerset constituency is unchanged from the existing Yeovil constituency in the revised proposals, therefore this name change is unjustified
Warminster and Shaftesbury	North Dorset and South Wiltshire	BCE-48430 (Brian Walker); BCE-47982 (Dee Worlock) The name is misleading and inaccurate and does not reflect the variety of the area.
Warminster and Shaftesbury	North Dorset and South West Wiltshire	BCE-47808 (Wendy Braithwaite); BCE-48081(Andrew Cattaway); BCE-45267 (Robert Gregory); BCE-44362 (Matt Hoskins); BCE-48516 (Andrew Tinsley); BCE-47888 (Mike Finean) Reflects the whole

		community, history and rural nature of the proposed constituency
Warminster and Shaftesbury	Blackmore Vale and Deverill Valley	BCE-48933(Valerie Pothecary)
		This name would reflect the extremely rural nature of the new constituency and adequately describe both areas
North Wiltshire	Chippenham and North Wiltshire	BCE-45678 (David Hopper)
		The main town in the constituency should be included in the name of that constituency
West Wiltshire	Trowbridge and Westbury	BCE-44311 (Peter Landymore)
		Logical to name this constituency by the names of its two main population centres
Devizes	East Wiltshire	BCE-51389 (Edward Keene)
		Incongruous with the neighbouring constituencies of West Wiltshire and North Wiltshire. More inclusive of all the towns and villages that make up the constituency.
North Swindon	Swindon North	BCE-51389 (Edward Keene)
		To observe the standard placement of a compass point distinguisher after town names and before county names.

South Swindon	Swindon South	BCE-51389 (Edward Keene) To observe the standard placement of a compass point distinguisher after town names and before county names.
Totnes	South Devon	BCE-42291 (Nick Strudwick) The name 'Totnes' is not representative of the constituency.
Torbay	Torquay and Paignton	BCE- 41452 (John Kiddey); BCE-51389 (Edward Keene) A sizeable part of Torbay is in the Totnes seat
South East Cornwall	Wivelshire	BCE-51389 (Edward Keene) The name will carry more historic resonance.
Newton Abbot	Newton Exminster	BCE-51389 (Edward Keene) Most of the constituency is formed of part of the ancient Hundred of Exminster.
North Somerset	Portbury	BCE-51389 (Edward Keene) Historical name of the area and to avoid confusion with the constituency of North East Somerset.
Bristol North West	Bristol North and	BCE-51389 (Edward

	Avonmouth	Keene)
		Two compass point identifiers is unnecessary. Avonmouth is suitable as it is slightly separated from urban Bristol
Forest of Dean	West Gloucestershire	BCE-51389 (Edward Keene)
		To be inclusive of the entire electorate of this constituency.

### How to view representations in the portal

55. Commissioners have been provided with login details that allow you to view all of the representations in the portal, download and view attachments.

BCE/2018/Paper 5 - Annex H



# **COMMISSIONERS' INFORMATION PACK**

# WEST MIDLANDS REGION

# FINAL RECOMMENDATIONS

# February 2018

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### Common national issues

1. We received over 35,000 representations across the country over the three consultation periods. Of these, approximately 10,700 were received in response to the consultation on the revised proposals. The spread of representations has not been even across the country. Representations received for each region are broken down in the table below. In addition, we have also received a number of petitions and writing campaigns during the final consultation. The total number of writing campaigns and petitions for each region is also provided in the table below.

Region	Consultation on revised proposals	Total representations	Total - petitions/ writing campaigns
East Midlands	421	2,048	6
Eastern	777	2,806	11
London	2,390	11,764	28
North East	540	1,968	7
North West	987	4,040	18
South East	2,511	5,438	26
South West	952	2,971	3
West Midlands	1,095	3,200	8
Yorkshire and the Humber	1,076	3,059	14
TOTAL	10,749	37,294	121

- In every region we have received representations that have not commented on specific boundaries, put forward alternatives or commented on names. These representations have largely focused on the following issues:
  - Opposition to the reduction in the number of MPs/constituencies
  - Opposition to having constituencies of equal size
  - Opposition to the use of the December 2015 electoral data
  - Opposition to using ward boundaries from May 2015
  - Concerns that the proposed boundaries reflect a political bias
  - Opposition to the proposals crossing county boundaries

- 3. We have not received regional-wide counter-proposals for every region in response to our revised proposals published in October 2017. In most cases, counter-proposals received during this consultation have been localised and focused on modifications to a small number of constituencies rather than across the entire region. These counter-proposals have been received from the central and local offices of the political parties, some politicians, and some individual members of the public. The central offices of the Conservative Party and Labour Party have made representations for all nine regions. The central offices for the other political parties did not submit a representation for each region, but in most cases the local offices have done so.
- 4. In some regions we have received counter-proposals that suggest dividing wards between constituencies. Details of these for this region are also provided later in this document.
- 5. Representations have also been received that comment only on the proposed names of constituencies. In some cases these have been localised comments; however, we have also received representations that have specifically commented on the Commission's approach to naming constituencies - i.e. length of name, cities/towns used in the constituency name and geographical context e.g. north/south.

# West Midlands regional information

#### Number of representations received

- 6. In the West Midlands, the Commission received a total of 1,095 representations during consultation on the revised proposals. In total the Commission received 3,200 representations for this region. There were also a number of duplicate representations within this total, as well as representations that made general comments that did not have any bearing on the substance of the initial or revised proposals.
- 7. The Commission received representations from the following respondents:

Type of respondents	Consultation on revised proposals	Total number of representations
Member of Parliament	20	130
Official political party response	4	16
Peer from House of Lords	0	7
Local councillor	55	257
Local authority	10	43
Parish or town council	21	63
Other organisation	21	162
Member of the public	964	2,522
Total	1,095	3,200

### <u>Campaigns</u>

8. As expected, throughout the region, representations from a number of organised campaigns were received. In the West Midlands, these were as follows:-

Campaign	ID Number	Support/ oppose Revised proposals	Strength (no. of signatories)
Oppose the	BCE-51972	Oppose	1,611

proposed boundary changes in Dudley			
Keep Bilston United	BCE-51961	Support	71
Tyburn Boundary Change Survey	BCE-51836	Support	134

- 9. In each of these instances, you will find one copy of the standard representation, together with a list of the names and addresses of those who either signed petitions, or submitted pro-forma letters.
- 10. During the previous consultations the Commission received five campaigns in relation to the West Midlands region. Of these, the campaign of Keep Bilston United was put forward again during the consultation on the revised proposals.

### Political party representations

11. Of the four main political parties, three have submitted responses, and there have been a few counter-proposals from local branches of the political parties. some of which offer alternatives and variations to those submitted by the national representatives of their parties. No counter-proposal has been received from anyone claiming to speak on behalf of the Green Party or UKIP. Both the Conservative Party (BCE-51896) and the Labour Party (BCE-51850) have substantially supported the revised proposals, and have submitted counter-proposals that affect only a few of the proposed constituencies in the region. The Liberal Democrat Party (BCE-51281 and BCE-51283) have submitted a more widespread counter-proposal, which differs in part from their response to the initial proposals. All three political parties supported splitting wards in the West Midlands region. The Conservative Party and the Labour Party did not suggest any further ward splits. However, the Liberal Democrat Party suggested splitting four wards (two new ones in Birmingham, and one in Dudley and one in Sandwell as in the initial proposals).

### Sub-regions and counter-proposals that propose alternative sub-regions

- 12. The revised proposal were constructed on the sub-regions of:
  - Coventry and Warwickshire
  - Solihull

- Herefordshire, Shropshire, Telford and Wrekin, and Worcestershire
- West Midlands county (less Coventry and Solihull)
- Staffordshire and Stoke-on-Trent
- 13. No counter-proposals have proposed alternative sub-regions. While there have been objections to the inclusion of the Bromsgrove District wards of Rubery North and Rubery South in the proposed Birmingham Northfield constituency, for example Carole Burden (BCE-49469), there has also been some support, such as Susan Briggs (BCE-50857). No other representations have proposed alternative sub-regions.

### Detailed analysis of representations within sub-regions

### **Coventry and Warwickshire**

- 14. The major issues that drew objections in this sub-region were:-
  - The inclusion of the Rugby Borough wards of Revel and Binley Woods, and Wolston and the Lawfords in the proposed Nuneaton constituency, instead of the proposed Rugby constituency;
  - The inclusion of the Warwick District ward of Radford Semele in the proposed Rugby and Southam constituency, instead of the proposed Warwick and Learnington constituency;
  - The inclusion of the town of Kenilworth in the proposed Coventry South and Kenilworth constituency, and the division of the City of Coventry between constituencies.
- 15. In response to the consultation the Commission received two counter-proposals in this sub-region. Some counter-proposals suggested the splitting of further wards between constituencies, these are detailed later in this section. The counter-proposals received that did not divide wards included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Jim Cunningham MP	BCE-51318	Proposes three alternative constituencies for Coventry.	No
Matt Western	BCE-49448	Meriden, Rugby and	No

MP	Southam, Warwick and Leamington - would not be valid as it leaves Meriden	
	out of the electorate range.	

- 16. The Commission has also received some support for its revised proposals in Coventry and Warwickshire. Namely the proposed constituencies of North Warwickshire, Stratford-on-Avon, and Warwick and Learnington were supported. However, there has been considerable opposition to the revised proposals for the Coventry South and Kenilworth, Nuneaton, and Rugby and Southam constituencies.
- 17. Jim Cunningham MP (BCE-51318) reiterated his objection to a linking of Coventry and Kenilworth, preferring that Coventry be linked with the town of Bedworth, as in his objections to the initial proposals. However, he has submitted a counter-proposal that re-distributed the wards included in the proposed Coventry East, Coventry North West, and Coventry South and Kenilworth constituencies into a different configuration, which he considers would unite wards 'which share close ties and demographics'.
- 18. Matt Western MP (BCE-49448) objected to the inclusion of the Warwick District ward of Radford Semele in the proposed Rugby and Southam constituency. He suggested that the ward should be included in the Warwick and Learnington constituency, to recognise the links between the ward and the nearby town of Royal Learnington Spa. He suggested that the Warwick District ward of Arden should be included in the Meriden constituency, to recognise the links between the ward and the town of Dorridge. This would have the effect of taking the electorate of the Meriden constituency outside the permitted range.
- 19. The inclusion of the town of Kenilworth in the proposed Coventry South and Kenilworth constituency was objected to as representations considered that the town of Kenilworth was rural and had no links to the City of Coventry. Objections were received from residents from both the City of Coventry, such as Melanie Harvey (BCE-44118), and from the town of Kenilworth, such as Laura Ruttledge (BCE-44953). Kenilworth Town Council (BCE-48217) argued that the proposals should be amended to take account of changes to Kenilworth's boundaries that were due to come into effect in 2019. Charles Bourne (BCE-49436) argued that the Leamington and Kenilworth constituency suggested in the initial proposals should be restored.

- 20. The inclusion of the Radford Semele ward in the proposed Rugby and Southam constituency was objected to as many representations, such as from Radford Semele Parish Council (BCE-50202), pointed out that the ward had closer links to the nearby town of Royal Learnington Spa, than to either Rugby or Southam. None of the objectors submitted a valid counter-proposal to achieve this move.
- 21. It should be noted that Peterson Cobbett's (BCE-49228) counter-proposal (see below) to split the Warwick District ward of Stoneleigh & Cubbington would allow for the Radford Semele ward to be included in the proposed Warwick and Learnington constituency, although he has not suggested this.
- 22. The inclusion of the Rugby Borough wards of Revel and Binley Woods, and Wolston and the Lawfords in the proposed Nuneaton constituency was objected to, with objectors, such as Councillor Julie A'Barrow (BCE-45505) and Ricky Niner (BCE-49772), highlighting the close ties the two wards had with the town of Rugby. None of the objectors submitted a valid counter-proposal to achieve this move.

# Solihull

- 23. There were no major issues that drew objections in this sub-region. The Commission has received support for its revised proposals in Solihull, with both of the proposed constituencies of Meriden and Solihull being supported.
- 24. No counter-proposals were received for this sub-region. Some representations argued that the Birmingham City ward of Sheldon had close links with Solihull, which had been recognised in the initial proposals, but did not submit a formal counter-proposal. Matt Western's invalid counter-proposal to include the Warwick District ward of Radford Semele in a Meriden constituency is discussed at paragraph 18 above.

# Herefordshire, Shropshire, Telford and Wrekin, and Worcestershire

- 25. The major issues that drew objections in this sub-region were:-
  - The inclusion of the town of Alvechurch and other Bromsgrove District wards in the proposed Redditch constituency;
  - The inclusion of the Herefordshire District ward of Old Gore in the proposed Malvern and Ledbury constituency, instead of the proposed Hereford and South Herefordshire constituency;

- The inclusion of Malvern Hills District wards in the proposed Evesham constituency;
- The inclusion of the Shropshire ward of Much Wenlock in the Ludlow and Leominster constituency;
- The inclusion of the Wychavon District ward of Norton and Whittington in the proposed Worcester constituency, instead of the proposed Evesham constituency.
- 26. In response to the consultation the Commission received two counter-proposals in this sub-region. The counter-proposals received that did not divide wards included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Liberal Democrat Party	BCE-51283 BCE-51281	Bridgnorth and The Wrekin, Bromsgrove and Droitwich, Evesham, Ludlow and Leominster, Malvern and Ledbury, Redditch	No
Nathan Rose	BCE-48300	Birmingham Northfield, Redditch - would be invalid as it would create a detached constituency	No

- 27. The Commission has received some support for its revised proposals in Herefordshire, Shropshire, Telford and Wrekin, and Worcestershire, particularly for the proposed constituencies of Telford, Worcester, and Wyre Forest.
- 28. The Liberal Democrat Party (BCE-51281 and 51283) submitted a counter-proposal that made changes to six constituencies in the sub-region, including keeping the two Rubery wards in a Worcestershire constituency, and the Much Wenlock ward in a Bridgnorth and The Wrekin constituency. They have argued that the proposed Ludlow and Leominster constituency is too large geographically, but it should be noted that their alternative is actually slightly larger in area.
- 29. The inclusion of eight Bromsgrove District wards in the proposed Redditch constituency was objected to. A number of representations, such as Caroline

French (BCE-44708), argued that these wards had strong ties with the town of Bromsgrove, and that the District of Bromsgrove should continue to form a constituency on its own. It was also noted, such as from Lickey and Blackwell Parish Council (BCE-50164), that the parish would be split between constituencies by the revised proposals. None of the respondents submitted a counter-proposal that would ensure that a Redditch constituency would have an electorate within the permitted electorate range.

- 30. Nathan Rose (BCE-48300) suggests including the Bromsgrove District ward of Wythall West in the proposed Birmingham Northfield constituency to recognise the ward's close links to Birmingham. This counter-proposal is invalid due to creating detached parts in the Redditch constituency.
- 31. The Old Gore ward was included in the proposed Malvern and Ledbury constituency, at both the initial and revised proposals. A number of representations, such as Claire Newman (BCE-41576), argued that the Old Gore ward had strong links with the town of Ross-on-Wye and should be in the same constituency (Hereford and South Herefordshire). No valid counter-proposal to achieve this was received, as the inclusion of the Old Gore ward would put the electorate of the Hereford and South Herefordshire constituency outside the permitted range.
- 32. The inclusion of five Malvern Hills District wards in the proposed Evesham constituency was objected to. A number of representations, such as Neil Baldwin (BCE-45562), argued that the five wards had closer ties with the town of Malvern, than with the town of Evesham.
- 33. The inclusion of the Shropshire wards of Much Wenlock, Brown Clee, Cleobury Mortimer, and Highley in the proposed Ludlow and Leominster constituency was objected to. A number of representations, such as Patricia Stokes-Smith (BCE-51609), argued that these wards had close ties to the town of Bridgnorth and should be in the same constituency.
- 34. The Wychavon District ward of Norton and Whittington was included in the proposed Worcester constituency. A number of representations, such as Julie Stokoe (BCE-51129), objected to the inclusion of the ward in the proposed Worcester, arguing that the ward was rural and that the M5 was a clear boundary between the two areas. There has been support for the proposed Worcester constituency, and at least one neighbouring ward needs to be included in the Worcester constituency to ensure that the electorate is within the permitted range.

# West Midlands county (less Coventry and Solihull)

- 35. The major issues that drew objections in this sub-region were:-
  - The division of the City of Birmingham between constituencies;
  - The division of the Borough of Dudley between constituencies;
  - The division of the existing Birmingham, Yardley constituency between three proposed constituencies;
  - The inclusion of the Walsall Borough ward of Pleck in the proposed Darlaston and Tipton constituency;
  - The inclusion of the Bromsgrove District wards of Rubery North and Rubery South in the proposed Birmingham Northfield constituency.
- 36. In response to the consultation the Commission received a number of counter-proposals in this sub-region. Some counter-proposals suggested the splitting of wards between constituencies, these are detailed later in this section. The counter-proposals received that did not further divide wards included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Conservative Party	BCE-51896	Birmingham Brandwood, Birmingham Hall Green	No
Labour Party	BCE-51850	Dudley, Halesowen and Rowley Regis, Stourbridge, Warley	No
Mike Wood MP	BCE-51844	Dudley, Wolverhampton South and Coseley	No
Stuart Summers	BCE-50968	Aldridge, Brownhills and Bloxwich, Walsall and Oscott	No
lan Kelman	BCE-49193	Birmingham Hodge Hill, Birmingham Yardley- would not be valid as it leaves Birmingham Yardley out of the electorate range	No

- 37. The Commission has also received some support for its revised proposals in the West Midlands county, namely some of the proposed constituencies in Birmingham.
- 38. The Conservative Party (BCE-51896) submitted a counter-proposal that alters two of the constituencies in this sub-region. They propose including the Birmingham City ward of Moseley and Kings Heath in our proposed Birmingham Hall Green constituency, which would be renamed Birmingham Moseley and Sparkbrook, and the Birmingham City ward of Hall Green in our proposed Birmingham Brandwood constituency, which would be renamed Birmingham Hall Green. They argue that the Moseley and Kings Heath ward is more an inner city ward than the Hall Green ward.
- 39. The Labour Party (BCE-51850) submitted a counter-proposal that alters four of the constituencies in this sub-region. They propose changes to constituencies in the Boroughs of Dudley and Sandwell to avoid 'the breaking of ties in the centre of Dudley arising from the separation of the St Thomas's ward in the Warley BC from Castle & Priory and St James's in the Dudley BC.' It should be noted that, while this counter-proposal re-unites the centre of Dudley in one constituency, it does divide the town of Stourbridge between constituencies.
- 40. Mike Wood MP (BCE-51844) objects to the inclusion of the Dudley Borough wards of Upper Gornal and Woodsetton, and Sedgley in the proposed Wolverhampton South and Coseley constituency. He has suggested that these two wards be included in the proposed Dudley constituency, with the Dudley Borough wards of Castle and Priory, and St James's being included in the proposed Wolverhampton South and Coseley constituency, thereby dividing the Borough of Dudley in an East/West, rather than North/South.
- 41. Stuart Summers (BCE-50968) suggests that the Walsall Borough wards of Blakenhall and Streetly should be swapped between the proposed Aldridge, Brownhills and Bloxwich, and Walsall and Oscott constituencies. He suggests that the Blakenhall ward has close ties with Bloxwich and should be in the same constituency, with the Streetly ward being included in the Walsall and Oscott to recognise that ward's connections with Birmingham.
- 42. Ian Kelman (BCE-49193) has submitted a counter-proposal that would include the Birmingham City ward of Stechford and Yardley North in the proposed Birmingham Yardley constituency, and the Birmingham City ward of Nechells in the proposed Birmingham Hodge Hill constituency. This counter-proposal would mean that the existing Birmingham Yardley constituency would only be

divided between two, instead of three, of the proposed constituencies. This would have the effect of taking the electorate of the Birmingham Yardley constituency outside the permitted range.

- 43. The largest group of objections for the whole region related to the revised proposals as they affected the existing Birmingham Yardley constituency. Many representations objected to the inclusion of the City of Birmingham ward of Acocks Green in the proposed Birmingham Hall Green constituency, to the inclusion of the Stechford and North Yardley ward in the proposed Birmingham Hodge Hill constituency, and to the consequential inclusion of the Nechells ward in the proposed Birmingham Yardley constituency. Objectors, such as the Birmingham City Councillors on the Yardley District Committee (BCE-51861), argued that the existing Birmingham Yardley constituency formed a coherent whole, and that there were no ties between the inner city ward of Nechells and the Sheldon ward, which was on the city boundary with Solihull.
- 44. The second largest group of objections for the whole region related to the proposed constituencies in the Borough of Dudley. There were many objections to the division of the Borough between constituencies. The inclusion of the St Thomas's ward in the proposed Warley constituency was objected to, such as from Robert Barlow (BCE-47961), because it would divide the centre of the town of Dudley between constituencies, with the ward being an 'orphan' ward in a predominantly Sandwell-based constituency. The inclusion of the Upper Gornal and Woodsetton, and Sedgley wards in the proposed Wolverhampton South and Coseley constituency was objected to, such as from Howard Sheldon (BCE-451109), because it would break ties between these wards and the town of Dudley.
- 45. The inclusion of the Pleck ward in the proposed Darlaston and Tipton constituency was objected to. For example, Cllr Khizar Hussain (BCE-51734) states that Pleck has strong ties with Walsall, which had been recognised in the initial proposals.
- 46. A number of objectors argued that the Commission should base their proposals on the May 2018 ward boundaries in Birmingham. For example, Birmingham City Council (BCE-51962) pointed out the discrepancies between the boundaries of the constituencies in the revised proposals and the boundaries of the new wards.

### Staffordshire, and Stoke-on-Trent

- 47. The major issues that drew objections in this sub-region were:-
  - The division of the City of Stoke-on-Trent between constituencies, and the inclusion of the towns of Kidsgrove and Stone, respectively, in the proposed Stoke-on-Trent North and Kidsgrove, or Stoke-on-Trent South and Stone constituencies;
  - The inclusion of the Lichfield District ward of Whittington & Streethay in the Tamworth constituency, instead of the Lichfield constituency;
  - The inclusion of the Stafford Borough ward of Haywood & Hixon in the proposed Lichfield constituency, instead of the proposed Stafford constituency.
- 48. In response to the consultation the Commission received a counter-proposal in this sub-region. The counter-proposals received that did not divide wards included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Nicky Davis	BCE-45740	Newcastle-under-Lyme, Stoke-on-Trent Central, Stoke-on-Trent North and Kidsgrove, Stoke-on-Trent South and Stone	Yes

- 49. The Commission has received some support for its revised proposals in Staffordshire and Stoke-on-Trent, namely the proposed constituencies in Stoke-on-Trent.
- 50. The revised proposals for the four constituencies covering City of Stoke-on-Trent and the Borough of Newcastle-under-Lyme received both support and objection. Dr Nicky Davis (BCE-45740) objected to the changes made in the revised proposals and suggested that the initial proposals should be restored. The inclusion of the town of Kidsgrove in the proposed Stoke-on-Trent North and Kidsgrove constituency has been objected to. For example, Mark Lewis (BCE-42657) has claimed that the town has stronger links to the rest of the Borough of Newcastle-under-Lyme, than it does to the north of the City of Stoke-on-Trent. The inclusion of the town of Stone in the

proposed Stoke-on-Trent South and Stone constituency. For example, Nigel Ellerton (BCE-45977) has claimed that the town has no links with the south of the City of Stoke-on-Trent.

- 51. The decision not to change the initial proposals for the Lichfield and Tamworth constituencies was strongly objected to. For example, Nigel Peet (BCE-41584) pointed out that Streethay was very close to the centre of the town of Lichfield and had very strong ties to that constituency. Fradley and Streethay Parish Council (BCE-51210) also noted that not including Streethay in the Lichfield constituency would divide the civil parish of Fradley and Streethay between constituencies. Many respondents suggested including the whole of the Whittington & Streethay ward in the Lichfield, which would then leave the proposed Tamworth constituency with an electorate outside the permitted range. Some have suggested that the Whittington & Streethay ward be split between constituencies (see below). The Liberal Democrat Party (BCE-51281 and 51283), in the text of their representation, suggest splitting the Whittington & Streethay ward, to only include the Streethay polling district in the Lichfield; however, the tables they have provided describing the contents of each constituency do not. However, David Murray (BCE-51595) does counter-propose that one ward should be split (see below).
- 52. The inclusion of the Stafford Borough ward of Haywood & Hixon in the proposed Lichfield constituency, instead of the proposed Stafford constituency continued to generate objections, for example from Mark Oliver (BCE-46529), as it had during the initial proposals consultation. No valid counter-proposal to achieve this was received, as the inclusion of the Haywood & Hixon ward would put the electorate of both the Lichfield and Stafford constituencies outside the permitted range.

# Counter-proposals that divided wards

53. As suggested above, some counter-proposals were received which suggested the dividing of additional wards between constituencies, these included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies/Ward(s) to be divided and reasons	Similar counter-proposal received and considered at initial proposals?
Long Lawford Parish Council	BCE-46440	Nuneaton, Rugby and Southam - would not be	No

			·
		valid as it leaves Rugby and Southam out of range. Splits the Wolston and the Lawfords ward.	
Peterson Cobbett	BCE-49228	Coventry South and Kenilworth, Warwick and Leamington. Splits the Stoneleigh and Cubbington ward.	No
Liberal Democrats	BCE-51283 BCE-51281	18 out of 20 proposed constituencies in the West Midlands county (less Coventry and Solihull) sub-region. Splits the Kings Norton, Oscott, Brierley Hill, and St Pauls wards.	Partial
Erdington Conservative Association	BCE-51804	Birmingham Erdington and Perry Barr, Walsall and Oscott, West Bromwich Splits the Stockland Green, and Charlemont with Grove Vale wards	No
Paul McMaster	BCE-51801	Birmingham Hodge Hill, Birmingham Yardley Splits the Hodge Hill ward.	No
Adrian Bailey	BCE-51939	18 out of 20 proposed constituencies in the West Midlands county (less Coventry and Solihull) sub-region. Splits the Nechells, Springfield, Tyburn, Brockmoor and Pensnett, and Bushbury North wards.	No
Kenneth Axford	BCE-50352	Birmingham Brandwood, Birmingham Hall Green, Birmingham Hodge Hill, Birmingham Yardley Undefined split of Bordesley Green ward between Birmingham Hodge Hill and Birmingham Yardley	No

Jonathan Stansby	BCE-43673	Birmingham Erdington, Birmingham Hall Green, Birmingham Hodge Hill, Birmingham Ladywood, Birmingham Yardley, Darlaston and Tipton, Walsall and Oscott, Warley, West Bromwich. Splits the Acocks Green, Oscott, and Pheasey Park Farm wards.	No
John Ashcroft	BCE-43500	Darlaston and Tipton, Warley, West Bromwich Splits the Wednesbury South ward between constituencies, instead of the Greets Green and Lyng ward.	No
Lichfield and Tamworth Conservative Associations	BCE-49004	Lichfield, Tamworth Splits the Hammerwich with Wall, and Whittington & Streethay wards between constituencies.	No
David Murray	BCE-51595	Lichfield, Tamworth Splits the Whittington & Streethay ward between constituencies.	No

### Alternative constituency names

54. As always, the naming of the proposed constituencies has proved to be a contentious issue. Many representations do not object to the proposed boundaries of constituencies, but suggest alternative names. Some responders, such as Edward Keene (BCE-51858), suggest a number of alternative names. Where alternative names result from changes proposed in the counter-proposals, these have not been listed below. Some of the alternative names suggested for constituencies for which no change in their composition is proposed are as follows:-

Proposed constituency name	Alternative names	Evidence for alternative name
Birmingham	Birmingham	Peter Fleming (BCE-43461)
Brandwood	Bournville	Brandwood is the name of a

[		
		cemetery. Bournville is famous for its association with Cadburys.
	Birmingham Kings Heath	Clive Jones (BCE-46195) No one knows where Brandwood is. Andrew Slater (BCE-41945) Kings Heath is an historic constituency name.
Bridgnorth and The Wrekin	The Wrekin and Bridgnorth	Cllr Cindy Mason-Morris (BCE-46588) The Bridgnorth part of the constituency is smaller than The Wrekin part.
	Bridgnorth and Newport or East Shropshire	Edward Keene (BCE-81858) Inappropriate to include the name Wrekin in the constituency name.
Bromsgrove and Droitwich	Bromsgrove and Droitwich Spa	Tim Elsey (BCE-43457) Full name of the town.
Burton	Burton and Uttoxeter	Liberal Democrats (BCE-51281) and (BCE-51283) Recognise the two main towns in the constituency.
Cannock Chase	Cannock	Edward Keene (BCE-51858) Recognise the main town rather than the district name.
Coventry North West	Coventry West	Edward Keene (BCE-81858) North is not necessary in the name.
Darlaston and Tipton	Darlaston, Tipton and Wednesbury, Wednesbury	Andrew Scattergood (BCE-49562) Wednesbury is central to the proposed constituency.
Evesham	Evesham and Pershore	Andrew Smith (BCE-41498) Recognise the two main towns in the constituency.
Hereford and South Herefordshire	Hereford or South Herefordshire	Edward Keene (BCE-81858) Proposed name is unnecessarily complex.
Ludlow and Leominster	South Shropshire and North Herefordshire	Burghill Parish Council (BCE-49918)

		Loss of identity with Herefordshire.
Meriden	Mid Warwickshire	Edward Keene (BCE-81858) Meriden is too small a place to be used in a constituency name.
North Warwickshire	North Warwickshire and Bedworth	Kyle Evans (BCE-4164) Recognises the town of Bedworth.
Redditch	North Worcestershire	Conservative Party (BCE-51896) The constituency contains more than just the town of Redditch.
Sutton Coldfield	Royal Sutton Coldfield	Andrew Mitchell MP (BCE-51866) Sutton Coldfield Town Council (BCE-48559) Reflect the 'Royal' status of the Town Council area.
Wolverhampton South and Coseley	Dudley North and Bilston	Mark Andrews (BCE-48172) More accurate than the proposed name.
Wyre Forest	Kidderminster	Edward Keene (BCE-81858) Recognise the main town rather than the district name.

# How to view representations in the portal

55. Commissioners have been provided with login details that allow you to view all of the representations in the portal, download and view attachments.

BCE/2018/Paper 5 - Annex I



# **COMMISSIONERS' INFORMATION PACK**

# YORKSHIRE AND THE HUMBER REGION

# FINAL RECOMMENDATIONS

# February 2018

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### Common national issues

1. We received over 35,000 representations across the country over the three consultation periods. Of these, approximately 10,700 were received in response to the consultation on the revised proposals. The spread of representations has not been even across the country. Representations received for each region are broken down in the table below. In addition, we have also received a number of petitions and writing campaigns during the final consultation. The total number of writing campaigns and petitions for each region is also provided in the table below.

Region	Consultation on revised proposals	Total representations	Total - petitions/ writing campaigns
East Midlands	421	2,048	6
Eastern	777	2,806	11
London	2,390	11,764	28
North East	540	1,968	7
North West	987	4,040	18
South East	2,511	5,438	26
South West	952	2,971	3
West Midlands	1,095	3,200	8
Yorkshire and the Humber	1,076	3,059	14
TOTAL	10,749	37,294	121

- In every region we have received representations that have not commented on specific boundaries, put forward alternatives or commented on names. These representations have largely focused on the following issues:
  - Opposition to the reduction in the number of MPs/constituencies
  - Opposition to having constituencies of equal size
  - Opposition to the use of the December 2015 electoral data
  - Opposition to using ward boundaries from May 2015
  - Concerns that the proposed boundaries reflect a political bias
  - Opposition to the proposals crossing county boundaries

- 3. We have not received regional-wide counter-proposals for every region in response to our revised proposals published in October 2017. In most cases, counter-proposals received during this consultation have been localised and focused on modifications to a small number of constituencies rather than across the entire region. These counter-proposals have been received from the central and local offices of the political parties, some politicians, and some individual members of the public. The central offices of the Conservative Party and Labour Party have made representations for all nine regions. The central offices for the other political parties did not submit a representation for each region, but in most cases the local offices have done so.
- 4. In some regions we have received counter-proposals that suggest dividing wards between constituencies. Details of these for this region are also provided later in this document.
- 5. Representations have also been received that comment only on the proposed names of constituencies. In some cases these have been localised comments; however, we have also received representations that have specifically commented on the Commission's approach to naming constituencies - i.e. length of name, cities/towns used in the constituency name and geographical context e.g. north/south.

# Yorkshire and the Humber regional information

#### Number of representations received

6. In Yorkshire and the Humber, the Commission received a total of 1,076 representations during consultation on the revised proposals. In total the Commission received 3,059 representations for this region. There were also a number of duplicate representations within this total, as well as representations that made general comments that did not have any bearing on the substance of the initial proposals.

7	The Commission reasived representations from the following respondents:
1.	The Commission received representations from the following respondents:

Type of respondents	Consultation on revised proposals	Total number of representations
Member of Parliament	7	47
Official political party response	8	27
Peer from House of Lords	1	1
Local councillor	22	226
Local authority	6	17
Parish or town council	13	44
Other organisation	12	104
Member of the public	1,007	2,593
Total	1,076	3,059

### <u>Campaigns</u>

8. As expected, throughout the region, representations from a number of organised campaigns were received. In Yorkshire and the Humber, these were as follows:-

Campaign	ID Number	Support/ oppose revised proposals	Strength (no. of signatories)
Boundary Proposals for Calderdale	BCE-44904	Support	7
Boundary Proposals for Brighouse and Calderdale	BCE-44301	Support	13
Boundary Proposals for the Halifax and Calderdale areas	BCE-44912	Support	5
Boundary Proposals for the Sowerby Bridge and Ryburn areas	BCE-44913	Support	6
Boundary Changes in South Bradford and Calderdale	BCE-44914	Support	4
Mostly Support for revised proposals - Bradford	BCE-49034	Mostly support	15
Oppose Bingley Rural in Bradford North	BCE-51945	Oppose	10
Oppose Derringham ward in Kingston upon Hull North	BCE-51947	Oppose	15
Great Grimsby constituency	BCE-51951	Oppose	99 online, 33 signed

- 9. In each of these instances, you will find one copy of the standard representation, together with a list of the names and addresses of those who either signed petitions, or submitted pro-forma letters.
- 10. During the previous consultations the Commission received five campaigns in relation to the Yorkshire and the Humber region. None of these campaigns were put forward again during the consultation on the revised proposals, although the Great Grimsby Constituency campaign (BCE-51951) is similar to the Great Grimsby 2gether campaign (BCE-33230).

### Political party representations

11. Of the three main political parties, each have submitted responses, and there have been a few counter-proposals from local branches of the political parties, some of which offer alternatives and variations to those submitted by the national representatives of their parties. No counter-proposal has been received from anyone claiming to speak on behalf of the Green Party or UKIP.

The Conservative Party (BCE-51917), Labour Party (BCE-51850) and Liberal Democrat Party (BCE-51380) have all largely supported the revised proposals. In some cases they have put forward limited counter-proposals; the Liberal Democrat party has continued to suggest a similar counter-proposal for a specific area to those they submitted during previous consultations.

# Sub-regions and counter-proposals that propose alternative sub-regions

- 12. The revised proposal were constructed on the sub-regions of:
  - Humberside
  - North Yorkshire
  - South Yorkshire and West Yorkshire
- 13. No counter-proposals have proposed alternative sub-regions, although, as in the initial proposals, we have received a very small number of comments suggesting that wards from Lincolnshire in the East Midlands region should be included in a Cleethorpes constituency to help resolve issues in Grimsby, for example BCE-44512 (Mark Harrison). No other representations have proposed alternative sub-regions.

# Detailed analysis of representations within sub-regions

# Humberside

- 14. The major issues that drew objections in this sub-region were:-
  - The continued division of the town of Grimsby with further requests for the splitting of the Croft Baker ward;
  - The inclusion of the Derringham ward in Kingston upon Hull North, rather than in Kingston upon Hull West and Haltemprice.
- 15. In response to the consultation the Commission received a number of counter-proposals in this sub-region. Some counter-proposals suggested the splitting of wards between constituencies, these are detailed later in this section. The counter-proposals received that did not divide wards included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Liberal Democrat Party	BCE-51380	Proposes three alternative constituencies for Kingston upon Hull.	Yes: the same as initial proposals which the Liberal Democrat Party supported.
West Marsh Forward	BCE-48980	Great Grimsby North and Barton, and Great Grimsby South and Cleethorpes - this would not be valid as it leaves Cleethorpes out of range.	Yes

- 16. The Commission has received no significant support for or objection to the remainder of the constituencies in Humberside, although there was some limited opposition to the town of Brigg and the rural wards to the east of Scunthorpe being included in a constituency with Grimsby.
- 17. There has been considerable opposition to the revised proposals (which are unchanged from the initial proposals) as they affect the town of Grimsby, with a petition submitted by Karl Wilson of Great Grimsby Labour Party (BCE-51951). In his own submission (BCE-50033), he considers that the Commission has not given due weight to the objections and has 'quoted disproportionately people who agree with the initial proposals'. It is considered that he has provided little new evidence but he disputes some of the claims made by others during the previous consultations. He continues to propose that the ward of Sydney Sussex be included in the Grimsby constituency, along with part of the divided Croft Baker ward. The representation from Cleethorpes Labour Party (BCE-50868) conversely supports the revised proposals.
- 18. The motion from North East Lincolnshire Council, submitted by Cllr Ray Sutton (BCE-49732) re-submits their initial counter-proposal. It is also suggested that the Croft Baker ward be split: how this could be achieved is contained within the representation by Austin Mitchell (BCE-51356). He also suggests that the Broughton and Appleby ward should be transferred from the Grimsby constituency.

- 19. Alternative proposals for the Grimsby and Cleethorpes areas were previously rejected by the Commission. It had been noted that options in this area were limited and that there was no perfect solution. Both the Conservative and Liberal Democrat parties support the initial and revised proposals for the two constituencies. Although the Labour Party submitted a counter-proposal at initial proposals, in their comments on the revised proposals (BCE-51850) they state: '...we do regret the confirmation of the Initial Proposals dividing the town of Grimsby. We believe this is a very serious breaking of ties and a town with a strong representative identity will be split between two constituencies in an arbitrary way. We do though recognise the Commission's difficulties and that split ward solutions themselves are not necessarily appropriate'.
- 20. Among those supporting the revised proposals, John Brown (BCE-42890), in common with a number of other representations, suggests that Great Grimsby South and Cleethorpes should be called Cleethorpes and Great Grimsby South.
- 21. In Kingston upon Hull, while there have been relatively few comments either in support of or objection to the revised proposals, the Liberal Democrat Party (BCE-51380) calls for the re-adoption of the initial proposals. There has also been a letter campaign (BCE-51947) against the inclusion of the Derringham ward in the Kingston upon Hull North constituency: 'Derringham ward has a natural border to the north of the city and has always had close links to the west Hull villages' (Julie Greenhill, BCE-50657).

# North Yorkshire

- 22. The major issue that drew objections in this sub-region was:-
  - The continued inclusion of the Filey ward in the Thirsk and Malton constituency rather than in Scarborough and Whitby, as in the initial proposals.
- 23. In response to the consultation the Commission received a counter-proposal in this sub-region. The counter-proposal received did not divide wards:

Organisation or Individual Numbers Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
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Richmond BCE-50636 (Yorks) constituency Labour Party	Richmond (Yorks),Thirsk and Malton, and Scarborough and Whitby.	Yes
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- 24. The Commission has received some support for its revised proposals in North Yorkshire, namely the treatment of the county as a sub-region without crossing county boundaries, and the proposed constituencies of Harrogate and Knaresborough, Richmond (Yorks), and Selby and Ainsty.
- 25. The Scarborough borough ward of Filey was included in the Scarborough and Whitby constituency in the initial proposals, and then included in Thirsk and Malton in the revised proposals (as in the existing constituency), allowing for the return of the Great Ayton ward to the Richmond (Yorks) constituency. This was suggested in the Conservative Party's proposals for North Yorkshire (BCE-30343 and BCE-41089), which also included the Thornton Dale ward in Scarborough and Whitby to 'represent a least worst option'. A number of representations now oppose Filey's continued inclusion in a Thirsk and Malton constituency.
- 26. Richmond Constituency Labour Party (BCE-50636), while welcoming the inclusion of Great Ayton in Richmond (Yorks), have submitted a counter-proposal to include the Filey ward, once again, in the Scarborough and Whitby constituency. This counter-proposal is effectively the same as outlined in their counter-proposal that was submitted during the initial proposals (BCE-28239). To compensate they 'return' the 'orphan' Ryedale District ward of Thornton Dale to the Thirsk and Malton constituency, as well as include the the Scarborough Borough ward of Derwent Valley in Thirsk and Malton. The Commission did not move Derwent Valley in either the initial or revised proposals. Although relatively few in number the vast majority of representations now received with regard to Filey support its inclusion in the Scarborough and Whitby constituency, and of the handful of representations received that mention the Thornton Dale ward, none support its inclusion in Scarborough and Whitby, as in the revised proposals. The representations received suggest that the inclusion of Filey in the Scarborough and Whitby constituency would be supported.
- 27. There was very limited opposition to the composition (Matthew Leighton, BCE-44555) and the names of the two York constituencies.

### South Yorkshire and West Yorkshire

- 28. The major issues that drew objections in this sub-region were:-
  - The inclusion of the Dearne South and Dearne North wards in different constituencies and, in particular, the inclusion of Dearne South in Doncaster North;
  - The treatment of the Metropolitan Borough of Barnsley;
  - The inclusion of the Penistone West ward in the cross-county constituency of Colne Valley;
  - The inclusion of the Hemsworth ward in the cross-county Barnsley East and Hemsworth constituency;
  - The inclusion of the Bingley Rural ward in the Bradford North constituency, instead of in Shipley;
  - The inclusion of the Guiseley and Rawdon ward in the Shipley constituency rather than in a City of Leeds-based constituency.
- 29. In response to the consultation the Commission received a number of counter-proposals in this sub-region. Some counter-proposals suggested the splitting of wards between constituencies, these are detailed later in this section. The counter-proposals received that did not divide wards included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies	Similar counter-proposal received and considered at initial proposals?
Conservative Party	BCE-51917	West Yorkshire (Shipley and Bradford North constituencies).	No
Beverley Craig, Philip Davies MP (et al)	BCE-43638 BCE-51422	As Conservative Party (above).	No
Wendy Bell	BCE-46018	Keighley, Shipley and Bradford North only.	Yes
Conor O'Neill	BCE-41529	Pudsey only - mostly supports but proposes further changes with imprecise detail and does not address surrounding constituencies.	No
Lisa Davies	BCE-43670	Wentworth and Dearne, Doncaster North and Don	No

		Valley only - would not be valid as Don Valley constituency is outside of the permitted range.	
Rachel Taylor	BCE-43218	Colne Valley and Dewsbury only - does not address surrounding constituencies and results in Dewsbury having an electorate of 64,520.	Yes

- 30. Relatively few representations, either in support of, or opposed to, the revised proposals were received throughout the whole of South Yorkshire. There was no significant opposition to the splitting of three wards in Sheffield and the Conservative Party (BCE-51917) now support Clive Betts' alternative splitting of wards which the Commission adopted. Jonathan Jordan (BCE-44949), while considering that 'the proposals in the city are enormously improved from the Initial Proposals', does suggest a few 'tweaks' in two alternative options, with different splits of the Central and Crookes ward (option 2), and the splitting of Manor Castle instead of Central ward (option 1).
- 31. The treatment of the Dearne wards, and in particular, the inclusion of Dearne South ward in Doncaster North has attracted significant opposition. A counter-proposal from Lisa Davies (BCE-43670) that attempts to address the issue is invalid as it results in a Don Valley constituency that is significantly outside the permitted electorate range. The Dearne wards were considered in depth by the assistant commissioners who visited the area when formulating their suggestions for revised proposals. Barnsley Metropolitan Council (BCE-48148) has submitted a counter-proposal that makes significant changes to the revised proposals. However, this splits the City of Wakefield ward of Normanton in West Yorkshire and, whether by accident or design, they have included the Hoyland Milton and Rockingham wards in their Barnsley East constituency, but not the Wombwell ward, thereby leaving the former two wards completely detached from the rest of the constituency.
- 32. There continues to be some opposition to the inclusion of the Penistone West ward in the cross-county Colne Valley constituency, but no significant new evidence has been presented, and there is some support for the revised proposals. The inclusion of the Wakefield local authority ward of Hemsworth in the cross-county Barnsley East and Hemsworth constituency has generated a number of objections, for example from Tony Upson, Chair of Hemsworth Town Council (BCE-50224) and Robert Hart (BCE-49647). A

second crossing of the county boundary was necessary and this was an area the assistant commissioners also visited. No viable counter-proposal to address the issue has been submitted. There has also been some limited objection to the creation of a Featherstone constituency and the inclusion of the Wakefield South ward in the constituency, for example, from John Southall (BCE-44649).

- 33. The redistribution of the Bradford South wards led to very significant opposition of the initial proposals. The Commission decided that no single counter-proposal was suitable and consequently proposed a completely new distribution. The revised proposals have been largely supported, particularly by community groups in a campaign listed at BCE-49034, although these representations do call on the Commission to consider further 'improvements' and to split (unspecified) wards. In the Commission's revised proposals, the Bradford Moor ward was included, as an 'orphan' ward in the Pudsey constituency. This has not proved to be particularly controversial with very few representations against. However, the Liberal Democrat Party (BCE-5380) consider that the revised proposals have gone 'too far' and call on the Commission to consider again their initial proposals, and Steven Jackson (BCE-43091) calls for the Tong ward to be included in the constituency instead of Bradford Moor, although this was widely opposed in the initial proposals.
- 34. The most contentious issue of the revised proposals by far is the inclusion of the Bingley Rural ward in Bradford North. Some 40% of the total number of representations received for the whole Yorkshire and Humber region come from the Bingley rural ward alone. Many representations suggest that the Bingley Rural ward be reunited with the Bingley ward in the Shipley constituency, where both wards are currently located, and that to compensate, Idle and Thackley ward (which is in the existing Bradford East constituency) be included in the revised Bradford North constituency. This counter-proposal, which produces electorates within the permitted range for both constituencies without any further knock-on effects, is supported by the Conservative Party (BCE-51917), Philip Davies, Member of Parliament for Shipley (BCE-51422) and very many others, for example Beverley Craig (BCE-43638), Valerie Lee (BCE-47789), and Howard Clough (BCE-50209). The Secretariat considers that this counter-proposal has very considerable merit.
- 35. A counter-proposal from Wendy Bell (BCE-46018) for two new Keighley and Shipley, and Airedale and Wharfedale constituencies does produce electorates that are within the permitted range. However it is considered that

the counter-proposal has significant drawbacks, for example, the inclusion of the Bingley, and Bingley Rural wards in separate constituencies.

- 36. The revised proposals for the Calderdale constituencies were widely welcomed with five letter writing campaigns in support covering various aspects of the revised proposals. However, a counter-proposal was received from Lord David Shutt (BCE-49937) and supported by David Witcher (BCE-51655) and others which splits the Calderdale ward of Luddendenfoot, two wards in Bradford (Royds, and Bowling and Barkerend) and affects four constituencies. A number of representations, while not objecting to the composition of the Calder Valley constituencies, considered that the names 'Upper and Lower Calder' are either inappropriate, and/or geographically inaccurate. In particular, there were objections to the large town of Halifax not being referenced in a constituency name (Upper Calder). It was submitted that the bulk of the constituency contains Halifax, which has been a constituency name since 1832 (Aleks Lukic, BCE-42397).
- 37. The final main area of contention concerns the inclusion of the 'orphan' City of Leeds ward of Guiseley and Rawdon in the Shipley constituency. The proposals were objected to in the initial proposals and there continues to be significant opposition at the revised proposals to the inclusion of what is a City of Leeds ward in a mostly City of Bradford constituency, and the division of Yeadon. Such opposition comes, for example, from John Appleton (BCE-42630) and Daniel Johnston (BCE-44885). It was considered necessary to include this ward of almost 18,000 electors in the Shipley constituency in the initial proposals, and it was not considered at either stage that there was a compelling case to split the ward.
- 38. Throughout Leeds generally there were comparatively few representations, whether in support of or objection to the revised proposals, for example, the continued and limited objection to the inclusion of the Adel and Wharfedale ward in Leeds North West rather than Leeds North East (Richard Camidge BCE-44591). However, there have been some representations objecting to the composition of the Elmet and Rothwell constituency, for example, David Jagger (BCE-43455) who has submitted a counter-proposal that splits the Robin Hood ward between the Batley and Morley, and Elmet and Rothwell constituency is the same as the existing constituency and was not altered in either the initial or revised proposals.

#### Counter-proposals that divided wards

39. As suggested above, some counter-proposals were received which suggested the dividing of wards between constituencies, these included:

Organisation or Individual	ID Numbers	Affected revised proposal constituencies/Ward(s) to be divided and reason	Similar counter-proposal received and considered at initial proposals?
Jonathan Jordan	BCE-44949	Sheffield constituencies. Two alternative options, with different splits of the Central and Crookes ward (option 2), and the splitting of Manor Castle instead of Central ward (option 1).	No
David Jagger	BCE-43455	Elmet and Rothwell and Batley and Morley only. Ardsley and Robin Hood ward - considers the housing estates have more in common with Elmet and Rothwell - would not be valid as Elmet and Rothwell would be above the permitted relectorate range.	No
Barnsley Metropolitan Borough	BCE-48148	Barnsley East and Hemsworth, Wentworth and Dearne, Doncaster North, Featherstone, Normanton Castleford and Pontefract. Splits Normanton ward. Would not be valid as two wards are physically detached from the remainder of their Barnsley East constituency.	No
Lord David Shutt, and David Witcher	BCE-49937 & BCE-51669	Lower Calder, Upper Calder, Bradford South, Bradford South East and Spen.	No

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		Splits three wards between constituencies: Luddendenfoot, Royds, Bowling and Barkerend. Uses new PD data for Bowling and Barkerend ward. Also supported by Colin Winterburn (BCE-51097) and John & Susan Hargreaves (BCE-51342).	
Various Community groups (including the Sandale Trust - BCE-49590), Judith Cummins MP (BCE-49600) and Cllrs (BCE-49592) letter writing campaign	BCE-49034 lead	Bradford. Generally welcome revised proposals, but some ask for further improvements including the splitting of unidentified ward/s.	Yes
Austin Mitchell	BCE-51356	North East Lincolnshire (Grimsby and Cleethorpes). Splits the Croft Baker ward, adds Sydney Sussex to Grimsby, and Brigg and Wolds, and Broughton and Appleby wards to Cleethorpes.	Yes
Great Grimsby Constituency Labour Party	BCE-50033	North East Lincolnshire (Grimsby and Cleethorpes). Splits the Croft Baker ward and adds Sydney Sussex to Grimsby.	Yes
North East Lincolnshire Council (Ray Sutton)	BCE-49732	North East Lincolnshire (Grimsby and Cleethorpes) Suggests a Greater Grimsby with an 66,834 electorate.	Yes

Suggests splitting Croft Baker ward, but does not provide evidence as to how. Initial and Revised Proposals 'artificially constrained by the East Midlands boundary'.	
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### Alternative constituency names

40. As always, the naming of the proposed constituencies has proved to be a contentious issue. Many representations do not object to the proposed boundaries of constituencies, but suggest alternative names. Some responders, such as Edward Keene (BCE-51919), suggest a number of alternative names. Where alternative names result from changes proposed in the counter-proposals, these have not been listed below. Some of the alternative names suggested for constituencies for which no change in their composition is proposed are as follows:-

Proposed constituency name	Alternative names	Evidence for alternative name
Sheffield South; Sheffield South East; Sheffield North and Ecclesfield	Respectively, Sheffield Heeley; Sheffield Attercliffe; Sheffield Brightside and Ecclesfield	BCE-44949 (Jonathan Jordan): return to more traditional rather than compass point names.
All Sheffield (apart from Sheffield Central)	Sheffield Attercliffe; Sheffield Brightside; Sheffield Hallam; Sheffield Heeley	BCE-51231 (Jonathan Harston): this ensures a historical continuity.
Sheffield South	Sheffield Heeley	BCE-41927 (Philp Wells): 'why abandon traditional names?'
Sheffield Hallam	Sheffield West	BCE-51919 (Edward Keene): designating the seat Sheffield West would create a symmetry with the other Sheffield seats, all of which are differentiated by a compass point. The use of 'Hallam' is inappropriate as Hallamshire is an ancient name for the entire area covered by the modern LA of Sheffield.

Sheffield South East	Sheffield East	BCE-51919 (Edward Keene): as the constituency comprises neighbourhoods to the east of Sheffield city centre, it can simply be called Sheffield East.
Rother Valley	Maltby and Dinnington	BCE-51919 (Edward Keene): the associated river valley includes none of the main settlements in the constituency The BCE should follow Policy B and use the names of its two leading civic centres – Maltby and Dinnington.
Lower Calder	Brighouse; Brighouse and Elland; Elland and Queensbury	BCE-42397 (Aleks Lukic): Lower Calder is a completely inaccurate description. The River Calder in West Yorkshire continues to run for many miles eastwards through Kirklees and Wakefield districts; Also BCE-44949 (Jonathan Jordan) a very poor name and includes areas far from the Calder and on high ground; BCE-51919 (Edward Keene - Brighouse and Elland).
Upper Calder	Halifax; Halifax and Upper Calder	BCE-42397 (Aleks Lukic): the constituency names would 'wipe Halifax from the political map'. There has been a constituency named Halifax since 1832.The bulk of the constituency contains Halifax. Also BCE-42225 (David Glanfield) and BCE-44949 (Jonathan Jordan) To reflect the inclusion of the three wards of Luddendenfoot, Calder and Todmorden by consider Halifax and Upper Calder.
Upper Calder	Halifax and Todmorden	BCE-51919 (Edward Keene): Halifax has almost 100,000 people. 'For a town of this size to have no constituency in the Commons named for it would amount to disenfranchisement' not seen since the 19th century.

Richmond (Yorks)	Northallerton and Richmond	BCE-41336 (Jamie Mash): Northallerton is the county town of N Yorkshire and the largest town in the constituency. Would avoid confusion with Richmond in London.
Thirsk and Malton	Thirsk and Ryedale	BCE-41414 (Lionel Cartwright-Terry): the opportunity to name this constituency according to the area it represents.
Batley and Morley	Morley and Batley	BCE-41734 (Frances Woolaston): the majority of the revised Batley and Morley constituency is in Morley.
Bradford South	Bradford South West	BCE-41890 (Aleks Lukic): would better describe the constituency's location relative to its neighbour.
Bradford South East and Spen	Spen and Bradford South East	BCE-46606 (Kirklees Council): the wards within the 'Spen' area constitute over 70% of the overall electorate.
Bradford South East and Spen	Spenborough	BCE-51919 (Edward Keene): Spenborough is a modern construct formed to resist the encroachment of the city of Bradford and to protect a distinct semi-rural identity.
Shipley	Shipley and Guiseley	BCE-51915 (Robert Winfield): reflects the inclusion of the Guiseley and Rawdon ward.
Great Grimsby South and Cleethorpes	Cleethorpes and Great Grimsby South or Cleethorpes and Grimsby South	BCE-42890 (John Brown); BCE-50868 (Shona McIsaac); BCE-45381 (Laceby Parish Council); and BCE-42881 (Cllr Matthew Brown); BCE-51339 (Ashby cum Fenton Parish); BCE-49566 (Waltham Parish Council): provides clear a differentiation between this and Great Grimsby North and Barton. Would make it easier for members

		of the public to identify which seat they fall into and who their MP is and ensures a clear community identity.
Great Grimsby North and Barton	Brigg, Great Grimsby North and Barton	BCE-43785 (Oliver Williamson) and BCE-42386 (Andrew Fowler): would identify the major locations in a more meaningful way to the electorate in what is a very large geographical area.
Great Grimsby North and Barton	North Lincolnshire, alternately, Brigg, Barton and Grimsby, or Broughton and Great Grimsby North	BCE-49140 (Duncan Anderson): the proposed name is irrelevant to many. It should reflect the two Local Authority areas it covers.
Great Grimsby North and Barton	Brigg and Grimsby	BCE-51074 (Duncan Anderson): would have relevance to Broughton, near Brigg, and residents in Barton-upon-Humber would recognise this name included them as they previously in a Brigg and Cleethorpes constituency.
Kingston upon Hull West and Haltemprice	Haltemprice and Kingston upon Hull West	BCE-42876 (Frank Oliver); BCE-45894 (H&HCA); and BCE-46229 (David Davis MP): the larger and most populous part of the constituency is formed of the Haltemprice wards, which overwhelmingly voted against being included within the boundaries of the City of Hull in a referendum in 2014.
Goole and Axholme	Goole, Howdenshire and Axholme or Goole, Axholme and Howdenshire	BCE-45894 (H&HCA): the proposed name excludes.an area of 205 square miles and 43,993 electors (61.6%).
Goole and Axholme	Haltemprice and Axholme or Haltemprice and Goole	BCE-46310 (Robert Briggs): a more representative name covering a wider part of the constituency.
East Yorkshire	Bridlington and	BCE-51919 (Edward Keene): the

	Driffield	proposed name may be confused with the East Riding of Yorkshire. Also the enclosed area is not the most easterly part of Yorkshire, Beverley is further east. The two largest towns in the constituency are centrally located within it.
York Central	City of York, York or York City	BCE-43266 (Ryan Boothroyd): the constituency takes in the city centre but extends into areas that local residents would consider to not be the centre.
Normanton, Pontefract and Castleford	Pontefract, Castleford and Normanton	BCE-48353 (Thomas Cliff) : would be seen as an insult to Pontefract and Castleford to have the small railway town as head of the constituency.
Featherstone	Wakefield South and East	BCE-45039 (Michael Taylor): would have better national recognition.
Featherstone	Rural and South East Wakefield; or, South East and Rural Wakefield; or Wakefield Rural and South East	BCE-49003 (David Hopkins): Featherstone is unreasonable and misleading. Featherstone is a modest village and ward, being no more than one of many equally identifiable communities.
Featherstone	Wakefield South and East; or Wakefield Rural, Walton and Ackworth; or Sandal, Walton and Upton; or South Elmsall, Crofton and Netherton	BCE-49373 (Jordan Bedford): a constituency should not be named after a place that is only going to represent a minority of the population. In the alternative names, anyone local will recognise the geographical scale of the constituency. By naming it after a single place, you are narrowing peoples' perceptions of how much of Wakefield the constituency actually covers.
Featherstone	Featherstone and South Kirkby	BCE-51919 (Edward Keene): includes the name of the second largest town to indicate the nature of the constituency as a collection of various parts.

Leeds North East	Leeds North	BCE-43301 (Alison Hodrien): the name gives a misleading impression of the area covered, which is much less an area to the east than Leeds North West does to the west.
Leeds Central	Leeds South	BCE-51915 (Robert Winfield): few of the residents from Beeston would consider they lived in the centre of Leeds.
Elmet and Rothwell	Rothwell and Wetherby	BCE-51919 (Edward Keene): Elmet covered a region much larger than that contained in the constituency and its existence ended 1,400 years ago.
Pudsey	Leeds West and Pudsey	BCE-51915 (Robert Winfield): a substantial part of the constituency includes wards from the existing Leeds West and have nothing in common with Pudsey.
Pudsey	Leeds West	BCE-51919 (Edward Keene): it is a part of Greater Leeds just as other areas. The name Leeds West would be consistent with the names of the other Leeds constituencies.
Colne Valley	Holmfirth, or South Pennines	BCE-45260 (Keith Gibson): Holmfirth will be the central location and its largest town. A valley name is irrational as only a small part of the area is within the Colne Valley - more is in the Holme Valley & Penistone is in the Don Valley. A suitable 'non-place' like South Pennines would be more appropriate.
Colne Valley	Colne Valley and Penistone	BCE-42684 (Robert Barnard): the name 'Penistone' has been associated with a constituency since 1918. And BCE 51919 (Edward Keene).
Barnsley West and	Include Penistone in	BCE-42684 (Robert Barnard): the

Stocksbridge	name	name 'Penistone' has been associated with a constituency since 1918.
Wentworth and Dearne	Wentworth and Hoyland or Wentworth and Wombwell.	BCE-44949 (Jonathan Jordan): reflects the names of the largest towns. The Dearne a small river barely within the constituency .
Wentworth and Dearne	Wombwell, Wath and Hoyland	BCE-51919 (Edward Keene): the three largest towns are Wombwell, Wath upon Dearne and Hoyland. Naming the constituency for these three would make it compliant with the Commission's own Policy B.
Doncaster Central	Doncaster	BCE-51919 (Edward Keene): as the constituency includes substantially all of the Doncaster urban area it should simply be called 'Doncaster'.
Doncaster North	Doncaster North and Burntwood	BCE-51426 (Cllr Kevin Rodgers): adding Burntwood to the name would reflect the Barnsley part of the constituency. Burntwood was the manorial estate in which the communities in Barnsley are historically part of.
Doncaster North	Thorne and Bentley	BCE-51919 (Edward Keene): the constituency includes very little of the contiguous urban area of Doncaster. No single settlement iis dominant, but there are a number of smaller towns after which it could be named.
Don Valley	Hatfield and Mexborough	BCE-51919 (Edward Keene): the constituency includes only a tiny section of the Don Valley, which runs for 70 miles. The name Don Valley is 'extremely disingenuous'.

# How to view representations in the portal

41. Commissioners have been provided with login details that allow you to view all of the representations in the portal, download and view attachments.