

Dear Mr [REDACTED]

BCE FOI/2023/06

Thank you for your email request for information to the Boundary Commission for England (BCE) on 12 July 2023, which has been considered under the terms of the Freedom of Information Act (FOIA) 2000. In your request for information you asked:

I am writing to request information under the Freedom of Information Act 2000 in order to assist you with this request. I am outlining my query as specifically as possible.

The final report of the Commission, confirmed the changes to Lewisham Deptford Constituency from the interim report and changed the recommended name from Deptford and North Lewisham, to Lewisham North. I would like to see all documentation pertaining to this change, including external/public submissions.

I am interested in any information held by your organisation regarding my request I understand that I do not have to specify particular files or documents and that it is your responsibility to provide the information I require.

With regard specifically for your request for information, the Commission papers and minutes of meetings, which cover the Commission's consideration of Parliamentary constituencies in London, are already in the public domain, including its considerations on the Lewisham North constituency. These are available to view here - <https://boundarycommissionforengland.independent.gov.uk/about-us/the-commissioners/commission-meetings-2020/>. Specifically, you may want to read the papers and minutes for the meetings held in August 2022 and March 2023, and the final report here: <https://www.legislation.gov.uk/ukpga/2020/25/contents/enacted>

I have also provided in my email a link to a paper that was prepared for and considered by our Lead Assistant Commissioner for London, and an extract from a spreadsheet containing the comments received for the Lewishman North constituency

2023-07-24 BCE-FOI 2023-05 London - Lead Commissioner briefing paper_v2_January 2023_Redacted

BCE-FOI-203-06 Extract from London final consultation -rep export

Under the provisions of the FOI Act if you are dissatisfied with the response provided you may wish to ask for an internal review. If this situation arises you should write to:

The Secretary to the Boundary Commission for England
35 Great Smith Street
Westminster
London
SW1P 3BQ

Email: information@boundarycommissionengland.gov.uk

If it transpires you are not content with our response or the internal review, you may apply directly to the Information Commissioner for a decision. Generally, the Information Commissioner cannot make a decision unless you have exhausted the complaints procedure provided by the BCE. The Information Commissioner can be contacted at:

The Office of the Information Commissioner,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF

Kind regards

Briefing paper for Lead Commissioner - London region

This paper summarises the responses to the consultation on the revised proposals for constituencies in the region. Attention is particularly focused on where new counter proposals have been put forward, and - where significant concerns remain in an area - a brief recap of what led to the revised proposals and what options for further amendment exist. Where helpful, key consultation responses are highlighted, as these will be the best examples - in respondents' own words - of the arguments put forward in any given case. Access to the backend database of the BCE consultation portal has been provided separately, so that these responses can be read directly by Commissioners. The mapping on the BCE portal frontend should be used to help visualise the issues and concerns, and Commissioners are also advised to make use of Google Maps - in particular the ground level 'Street View' functionality - for the most complex cases, as opportunity for further in person site visits will be very limited. This paper should be read prior to the Lead Commissioner meeting for the region scheduled for 20 February 2023, which should determine what the formal recommendations to the full Commission final decision meeting should be.

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Macro issues

Sub-region compositions

In the revised proposals, we divided our initially proposed North West and North Central London sub-region into two smaller groupings, using the A5 road as a boundary. Treating North West and North Central areas separately also allowed us to more easily include the City of London in a constituency with Westminster. These revised sub-regions have been largely supported in the revised proposals consultation, with no counter proposals submitted to cross the A5 road or use different sub-regional groupings.

In South London, we divided our initially proposed South West and South Central London sub-region into two smaller groupings, to avoid Longthornton ward (Merton) becoming an orphan ward in a Croydon constituency. This has been largely supported in the revised proposals consultation, with no counter proposals submitted to use different sub-regional groupings.

General views of the main national parties

- Conservative (116291): Accept the composition of 68 of the 75 revised proposal constituencies (if reluctant in parts). Propose composition changes for seven constituencies, and name changes for four.
- Green (115221): Largely satisfied with the revised proposals except in parts of Lambeth and Southwark.
- Labour (116069): Accept the revised proposals for the whole region apart from in the borough of Havering, where they argue that the initial proposals were a better solution.
- Liberal Democrats (112598): Accept the composition of 63 of the 75 revised proposal constituencies. Propose composition changes for 12 constituencies, and name changes for 14.

Other 'whole region' responses

- 113662 - accepts revised sub-regional boundaries, but proposes composition changes for 29 constituencies. In North London, provides a counter proposal for all five constituencies in Newham and Tower Hamlets, as well as constituencies in Westminster, Camden and parts of Barnet, Haringey and Hounslow. Counter proposal for Barnet/Camden/Haringey is the same as the original Liberal Democrats counter proposal. Advocates returning to IP in Hillingdon. In South London, provides a counter proposal for Bexley and parts of Bromley and Greenwich, which is very similar to the original Labour Party counter proposal. Also makes a counter proposal for parts of Croydon, Lambeth and Southwark, and advocates returning to IP in Kingston upon Thames.
- 102815 - counter proposal for seven constituencies in the boroughs of Enfield, Haringey and Hillingdon.

- 109585 - counter proposal for eight constituencies in the boroughs of Brent, Enfield, Hounslow, and Richmond upon Thames (north).
- 117026 - counter proposal for eight constituencies in the boroughs of Barnet, Enfield, Haringey and Camden. Advocates returning to the IP in Enfield, and an arrangement similar to the IP in Barnet and Haringey.
- 111554 (John Bryant) - counter proposal for seven constituencies in the boroughs of Croydon, Lambeth and Southwark.
- 112658, 113553, and 116415 - confined to a number of suggested name changes, rather than boundary changes.

North East London

<p>1, 2 & 3</p>	<p>Havering: Hornchurch and Upminster / Romford / Dagenham and Rainham</p>	<p><u>Background to revised proposals:</u> One of the largest issues in the initial proposals for London was the transfer of Emerson Park ward from Hornchurch and Upminster to Romford. The revised proposals sought to address the issue by keeping Emerson Park in Hornchurch and Upminster, and splitting three ‘existing’ (i.e. December 2020) wards along Havering’s new (2021) ward boundaries - under the proviso that a ward split is necessary in Havering to avoid significant knock-on disruption to the existing pattern of constituencies across the entire North East sub-region. The revised proposals divided the existing Emerson Park, St Andrew’s, and Hacton wards along their new boundaries, but for numerical reasons, it was not possible to take account of the new boundary at the southwesterly end of Hacton ward.</p> <p><u>Revised proposals consultation response:</u> There is general support for Emerson Park being included in Hornchurch and Upminster (~70 reps), and the Conservative Party, Liberal Democrats, and local MPs Julia Lopez (115148) and ██████████ (116528) endorse our ward-split solution. Havering Local Authority (108681), however, expresses concern that the revised proposals do not take account of the new boundary at the southwesterly end of Hacton ward and request us to revisit this. ██████████ also requests us to take account of the boundary of the new Havering-atte-Bower ward, which runs through a rural area and would not affect any electors. The Labour Party opposes our ward-split solution on the basis that it would contravene BCE statutory criteria and the circumstances are not exceptional enough to justify three ward splits. Labour continues to support the initial proposals for Havering. Jonathan Stansby (106134) describes our solution as ‘convoluted’ and proposes instead to include the whole of the existing Emerson Park ward in Hornchurch and Upminster, divide Hacton ward using existing polling districts, and divide St Andrew’s ward along its new boundary. There is some opposition (~10 reps) to the Elm Park area being linked with Dagenham. Elm Park is currently divided between Hornchurch and Upminster, and Dagenham and Rainham, and (thanks to the new ward boundaries) the revised proposals brought the Elm Park community together under the Dagenham and Rainham constituency. However, respondents such as 103682 feel more closely aligned to Hornchurch than to Dagenham.</p> <p><u>Commentary:</u> Despite the Labour Party’s reservations, there are unlikely to be strong arguments for reverting to the initial proposals in Havering borough. Any changes to the revised Havering constituencies would likely be confined to the exact configuration of the ward splits, and this may come down to a hard binary decision between Jonathan Stansby’s counter proposal and the revised proposals.</p>
<p>4</p>	<p>Barking and</p>	<p><u>Background to revised proposals:</u> The initial proposals maintained the existing Barking constituency</p>

	<p>Dagenham: Barking</p>	<p>unchanged except for the transfer of Valence ward to Dagenham and Rainham. Although receiving very few reps from the area, this was generally supported and therefore maintained in the revised proposals.</p> <p><u>Revised proposals consultation response:</u> Very little response regarding Barking. However, Barking and Dagenham Local Authority (115643) and Jon Cruddas, MP for Dagenham and Rainham (111011), both strongly encourage us to align constituency boundaries in Barking and Dagenham borough with the new ward boundaries, for which the Order was made in December 2021. Jon Cruddas notes the ‘precedent’ set by the Hornchurch splits.</p> <p><u>Commentary:</u> While there would be practical logic in using the borough’s new ward boundaries, there is no need to split a ward in Barking and Dagenham, therefore we have no reason to consider the new ward boundaries. Furthermore, both Barking and Dagenham Local Authority and Jon Cruddas use estimated electorate figures in their calculations, and their total constituency electorates do not align with one another.</p>
<p>5 & 6</p>	<p>Redbridge: Ilford South / Ilford North</p>	<p><u>Background to revised proposals:</u> The initial proposals included Chadwell Heath ward (Barking and Dagenham borough; currently in Dagenham and Rainham constituency) as an orphan ward in Ilford South, while Cranbrook and Valentines wards were transferred from Ilford South to Ilford North. We received a petition from Chadwell Heath residents opposed to being separated from their neighbouring Barking and Dagenham ward of Whalebone. The Conservative Party provided a counter proposal to transfer Becontree ward instead of Chadwell Heath, but the Assistant Commissioners considered that this would be an inferior option to the initial proposals. Therefore initial proposals were maintained.</p> <p><u>Revised proposals consultation response:</u> Three reps continue to oppose Chadwell Heath being included in Ilford South, including the Chadwell Heath Residents Association (117123) who submitted the petition and spoke at the Romford public hearing. Five reps from the wider Ilford area support Chadwell Heath being included in Ilford South, on the basis that it would be united with Chadwell ward. Most responses regarding Ilford North support the inclusion of Cranbrook and Valentines wards in this constituency (e.g. 115063). The Liberal Democrats propose that Ilford South be named ‘Ilford and Chadwell Heath’, and Ilford North be named ‘Gants Hill and Barkingside’.</p> <p><u>Commentary:</u> Unlikely to be a strong case for changing the revised proposals boundaries. Although the proposals would break ties between Chadwell Heath and Whalebone wards, we have received no further evidence to demonstrate that the original Conservative counter proposal would be a better solution, nor have we received any other counter proposals. Note that the Conservative Party now supports the revised</p>

		proposals. On naming, there is unlikely to be a strong case for amending the constituency names as the Liberal Democrats propose, since the revised constituencies are largely based on the existing constituencies.
7	Redbridge & Waltham Forest: Leyton and Wanstead	<p><u>Background to revised proposals:</u> Under the initial proposals, the existing Leyton and Wanstead constituency was changed only to align with new ward boundaries and to include the whole of South Woodford ward (in which part of the existing constituency is already contained). Most respondents supported this approach, although some argued that South Woodford should be included in a constituency with other Woodford wards, rather than with Wanstead. However, the evidence and counter proposals were not compelling enough to persuade the Assistant Commissioners to change the initial proposals. Maintained as revised proposals.</p> <p><u>Revised proposals consultation response:</u> Very few responses received about Leyton and Wanstead. Some concerns remain over the separation of South Woodford from the rest of Woodford, but no further substantive evidence received.</p> <p><u>Commentary:</u> Unlikely to be any reason to change the revised proposals.</p>
8 & 9	Redbridge & Waltham Forest: Walthamstow / Chingford and Woodford Green	<p><u>Background to revised proposals:</u> The existing Walthamstow constituency was retained wholly unchanged in the initial proposals, and only minor change was proposed for Chingford and Woodford Green. A number of respondents opposed the fact that these two constituencies would cross the A406 (North Circular road) because 1) Waltham Forest now has new ward boundaries which <i>do not</i> cross the A406, following the Order in May 2021; and 2) the A406 represents a hard barrier and divides communities. Many respondents including the Conservative Party and ██████████ put forward a counter proposal to follow the new ward boundaries and therefore align the constituency boundaries with the A406. This counter proposal was ultimately rejected by Assistant Commissioners on the basis that it would require two existing wards to be split, and these splits would not be in accordance with BCE ward-splitting policy.</p> <p><u>Revised proposals consultation response:</u> The A406 issue emerges again, with ~20 reps strongly encouraging us to use Waltham Forest's new ward boundaries along the A406. There is disappointment that we used new boundaries in Havering to split wards, but not here. See 111784 (Waltham Forest Conservative Councillors Group), 115989 (Larkwood ward councillors), and 104569 (Walthamstow Stadium Area Residents Community Association). The Conservative Party and ██████████ continue to oppose our proposals and advocate their counter proposal.</p> <p><u>Commentary:</u> On the ground it would clearly make sense to use the A406 as a boundary between</p>

		<p>Walthamstow and Chingford and Woodford Green, and many of the arguments are compelling. However, following the new ward boundaries here is still likely to be considered to contravene BCE policy as outlined above and in paragraph 3.66 of the revised proposals report. The arguments applicable to Havering are not the same as the arguments applicable to Waltham Forest.</p>
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Newham and Tower Hamlets

1	Bethnal Green and Stepney	<p><u>Background to revised proposals:</u> The initial proposals allocated five constituencies to Newham and Tower Hamlets - an increase of one whole constituency from the current arrangement. There was general support for grouping Newham and Tower Hamlets together as a sub-region, with few responses received for the area compared with the rest of London. Bethnal Green and Stepney received a particularly low response rate. Retained in revised proposals.</p> <p><u>Revised proposals consultation response:</u> Residents of Shadwell ward put forward a petition (114273) to rename the constituency 'Bethnal Green and Shadwell', to reflect Shadwell's history and amenities. Total 354 signatories.</p> <p><u>Commentary:</u> Unlikely to be a strong case for changing the initially proposed constituency name. Shadwell forms only a small part of the constituency (and in fact spills over into the neighbouring Poplar and Limehouse), whereas Stepney represents a much larger area and was the name of the former metropolitan borough.</p>
2	Poplar and Limehouse	<p><u>Background to revised proposals:</u> The naming of the Poplar and Limehouse constituency generated comment at initial proposals, with residents arguing that Isle of Dogs, Canary Wharf, or Docklands should be included in the constituency name. However, others argued that the existing name represented the constituency well. Regarding composition, some respondents argued that St. Katharine's & Wapping ward formed a long salient to the constituency, and should instead be included in Bethnal Green and Stepney. Assistant Commissioners were not convinced by the evidence to change either the name or composition of the constituency, however. Retained in revised proposals.</p> <p><u>Revised proposals consultation response:</u> The name of the constituency continues to be debated, with 'Poplar and the Isle of Dogs' still emerging as the most popular alternative name.</p> <p><u>Commentary:</u> No further substantive evidence has been received regarding the name or composition of the constituency. Therefore, since alternative options were rejected for the revised proposals, there is unlikely to be a strong case for adopting any alternatives for the final recommendations.</p>
3	Stratford and Bow	<p><u>Background to revised proposals:</u> Although Stratford and Bow attracted mixed views during the initial proposals consultation, there was general agreement that crossing the River Lee towards the north of the</p>

		<p>borough boundary (i.e. between Stratford and Bow) would make more sense than towards the south (i.e. between Poplar and Canning Town) due to the greater number of transport links and recent development of the Olympic Park. Retained in revised proposals.</p> <p><u>Revised proposals consultation response:</u> Around 10 responses in opposition, on the grounds that the constituency would cross borough boundaries.</p> <p><u>Commentary:</u> Since a cross-borough constituency is necessary in Newham and Tower Hamlets, and given the general agreement for crossing the boundary between Stratford and Bow, there is unlikely to be any case for changing the revised proposals.</p>
4	West Ham and Beckton	<p><u>Background to revised proposals:</u> Some respondents advocated that West Ham ward should be included in Stratford and Bow rather than West Ham and Beckton, due to community ties with Stratford, and instead Green Street West ward should be included in West Ham and Beckton. While acknowledging that some parts of West Ham ward would undoubtedly have ties with Stratford, Assistant Commissioners were ultimately not persuaded to adopt this counter proposal. Initial proposals retained as revised proposals.</p> <p><u>Revised proposals consultation response:</u> Very little response. One rep (107142) continues to highlight community ties between West Ham ward and Stratford. The name 'Canning Town and Beckton' is proposed by 113553.</p> <p><u>Commentary:</u> No further substantive evidence has been received, therefore there are unlikely to be any arguments for changing the revised proposals boundaries. Replacing West Ham with Canning Town in the constituency name would probably be ill received given West Ham's historical significance as a former local government district.</p>
5	East Ham	<p><u>Background to revised proposals:</u> Almost unanimous support for the initially proposed constituency, therefore retained in revised proposals.</p> <p><u>Revised proposals consultation response:</u> One rep in support.</p> <p><u>Commentary:</u> Unlikely to be any case for changing the revised proposals.</p>

North Central London

<p>1, 2 & 3</p>	<p>Barnet: Chipping Barnet / Finchley and Golders Green / Hendon</p>	<p><u>Background to revised proposals:</u> The initial proposals divided the borough of Barnet into five constituencies, only one of which was wholly contained within the borough. Two constituencies crossed the A5 road. Respondents strongly opposed the division of the borough into five constituencies, especially when compared to the existing arrangement of three coterminous constituencies, but we received a mixture of support and opposition for constituencies crossing the A5. There was also a mixture of support and opposition to the proposed Finchley and Muswell Hill constituency, spanning Barnet and Haringey. There was strong opposition, however, to the transfer of East Barnet and Brunswick Park wards from Chipping Barnet to the proposed Southgate and Barnet East constituency. We received several counter proposals for Barnet (as part of wider submissions for the North Central area), most of which sought to reflect the existing pattern of constituencies more closely than the initial proposals. Noting that Barnet has too many electors to accommodate three whole constituencies, counter proposals often put forward three constituencies based on the three existing constituencies, with an orphan ward (or sometimes two wards) joining a constituency in a neighbouring borough. There was notable support for the Conservative Party counter proposal, which maintained the existing Finchley and Golders Green constituency unchanged except for realignment with new ward boundaries, and closely reflected the existing Chipping Barnet and Hendon constituencies. The Conservative Party's proposal was adopted for the revised proposals, with Friern Barnet ward becoming an orphan ward in the Haringey-based Hornsey and Friern Barnet constituency.</p> <p><u>Revised proposals consultation response:</u> Considerable support (~260 reps) for the revised constituencies of Chipping Barnet, Finchley and Golders Green, and Hendon. Around 110 reps form part of a campaign in support: see 103339 (Chipping Barnet focus - 19 reps), 100689 (Finchley and Golders Green focus - 72 reps) and 103653 (Hendon focus - 18 reps). However, there is strong opposition (~120 reps) from the residents of Friern Barnet ward to being 'removed' from a Barnet constituency and joined with the Hornsey area south of the A406 road. Residents argue that their ties are to the west and to the north, in the borough of Barnet, not south to the borough of Haringey. Some argue that the ward should be split along the A406 (e.g. 112924). The following counter proposals have been received for Barnet:</p> <ul style="list-style-type: none"> ● 108277 - Keeps Edgwarebury ward in the Hendon constituency. In doing so, it includes Mill Hill ward in a Finchley constituency. ● 114238 - Proposes East Finchley should be the orphan ward in a Haringey-based constituency rather than Friern Barnet. Significant reconfiguration of other Barnet constituencies. ● 101222 - Suggestion for Highgate ward to replace Friern Barnet ward in the Hornsey constituency. Would require splitting Friern Barnet and Child's Hill wards.
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		<ul style="list-style-type: none"> • 117026 - Also covers Enfield and Haringey. Based on the initial proposals for Barnet, Enfield and Haringey with some amendments. <p><u>Commentary:</u> While receiving support for the three revised constituencies contained wholly within Barnet, the issue of the Friern Barnet orphan ward, alongside the overwhelmingly strong opposition to the revised proposals for Enfield and Haringey (discussed below) presents a challenge that requires consideration. There may be a case for considering a return to a constituency pattern closer to some of the initial proposals for Barnet. This will need to be considered in conjunction with Enfield and Haringey, and is discussed in further detail below. Visiting the area might be of value.</p>
4, 5, 6, 7 & 8	<p>Enfield & Haringey: Edmonton / Enfield North / Southgate and Wood Green / Hornsey and Friern Barnet / Tottenham</p>	<p><u>Background to revised proposals:</u> The extent of change to the borough of Enfield was limited in the initial proposals: Edmonton and Enfield North were unchanged from the existing constituencies except to realign with prospective ward boundaries, while most of the existing Enfield Southgate constituency stayed together and was joined with two neighbouring Barnet wards. We received very few reps overall for the borough of Enfield. In Haringey, we proposed a Hornsey and Wood Green constituency contained entirely within the borough, a Tottenham constituency which included two Hackney wards, and Finchley and Muswell Hill which crossed into Barnet. Key issues in Haringey were the transfer of West Green ward from Tottenham to Hornsey and Wood Green, and the inclusion of Hackney's Brownswood and Woodberry Down wards in Tottenham. Given the reinstatement of the A5 as a sub-regional boundary for the revised proposals, and changes to the borough of Barnet, it was also necessary to make changes to Enfield and Haringey. We adopted the Liberal Democrats counter proposal for constituencies of Enfield North, Edmonton, Southgate and Wood Green, and Tottenham. This addressed the West Green issue, by returning the ward to Tottenham, but presented more change for the borough of Enfield than the initial proposals, and introduced a cross-borough Enfield-Haringey constituency (in place of an Enfield-Barnet constituency). We adopted an amended version of the Conservative Party's Hornsey and Friern Barnet constituency, which included all the Hornsey wards besides Highgate.</p> <p><u>Revised proposals consultation response:</u> Overwhelmingly strong opposition from the borough of Enfield: ~800 reps in opposition across the borough. This makes Enfield the 'biggest' issue in London. The opposition is fundamentally about the division of the existing Enfield Southgate into three different constituencies, and four key themes emerged from this: 1) General opposition to the joining of the Southgate (Enfield) and Wood Green (Haringey) areas, making a geographically long and narrow constituency which crosses borough boundaries and the A406, with communities sharing very little in common (~460 reps); 2) Opposition to the transfer of Winchmore Hill ward from Enfield Southgate to Edmonton (~350 reps); 3) Opposition to the</p>

transfer of Grange Park ward from Enfield Southgate to Enfield North (~170 reps; although ~25 reps in support); and 4) General consensus that the initial proposals for Southgate and Barnet East (or something similar to this) would be much better for Southgate (~50 reps). Many reps also cite the A10 road as a natural boundary in the borough.

There is also strong opposition from the borough of Haringey, albeit in smaller numbers (~130 reps across the borough). The opposition centres on: the division of the borough into four constituencies, none of which would be contained wholly within the borough (in contrast to the initial proposals, which divided Haringey into three constituencies, one of which was wholly contained in the borough); the division of the existing Hornsey and Wood Green into three different constituencies; and the 'civic capital' of the borough, Wood Green, being paired with Enfield and therefore removed from the local areas it actually serves. There is a general consensus that the initial proposals were a better solution for Haringey (with a straight swap of West Green and Harringay wards, as put forward in the original Labour Party counter proposal). See the following reps:

- *From an Enfield perspective:* 111652 (David Burrowes - former MP - objecting to Southgate and Wood Green), 117071 (Hadley Wood Association), 108436 (local resident)
- *Winchmore Hill focus:* 105341 (letter-writing campaign - 21 respondents), 101139 & 109599 (local residents outlining Winchmore Hill's ties to Southgate)
- *Grange Park focus:* 111012 (local resident), 111489 (██████████ for Enfield North - makes counter proposal to swap Grange Park and Ponders End wards). Some respondents oppose ██████████ counter proposal and support the revised proposals for Enfield North e.g. 114721, 106666, 114762 (Enfield North Conservative Association)
- *Indication of ties between Enfield and Barnet:* 111096 (Cockfosters Local Area Residents Association), 116209 (local resident)
- *From a Haringey perspective:* 117061 (██████████), 110551 (Catherine West, MP for Hornsey and Wood Green), 114266, 100766, 107799 & 112373 (local residents advocating initial proposals over revised proposals)
- *Reps in support of the revised proposals:* 112974 (Edmonton Conservative Association), 106618 (Federation of Enfield Community Associations)

The following counter proposals have been received for Enfield and Haringey, in addition to ones mentioned above:

- 109585 - Reconfiguration of the Enfield constituencies with a split of Carterhatch ward.
- 116193 - Same as original Conservative Party counter proposal for Enfield West and Southgate.
- 114350 - Enfield Southgate Conservative Association. Reconfiguration of the five Enfield/Haringey constituencies with a split of Grange Park ward. Divides Haringey into five constituencies and creates a three-borough constituency (Hackney-Haringey-Barnet).

		<ul style="list-style-type: none"> ● 114501 - similar to Enfield Southgate Conservative Association but without Grange Park split. Divides Haringey into four constituencies and creates a three-borough constituency (Hackney-Haringey-Barnet). ● 102815 - Reconfiguration of the five Enfield/Haringey constituencies. <p>Regarding the revised Tottenham constituency, there is support for West Green ward being 'returned' to the constituency, but strong opposition to the inclusion of the two Hackney wards of Brownswood and Woodberry Down (~130 reps). Opposition is heavily weighted towards Brownswood ward, and ~60 respondents argue that if the ward has to move, it would fit much better in the Islington North constituency given the local ties to the Finsbury Park and Highbury areas. Although the revised proposals are the same as the initial proposals for Brownswood and Woodberry Down, opposition has emerged more strongly in the revised proposals consultation than any previous consultations. See 114263 (local resident) and 116177 (local councillor). David Lammy MP (114673) accepts the revised proposals but raises the suggestion to transfer Stamford Hill West ward rather than Brownswood. He proposes naming the constituency 'Tottenham and Woodberry Down'. 115272 presents a counter proposal to include the Stamford Hill area in Tottenham instead of Brownswood / Woodberry Down to recognise the local Haredi Jewish community. Would require two ward splits.</p> <p><u>Commentary:</u> Given the very strong response from Enfield (in particular) and Haringey, consideration should be given to whether the evidence from all consultations warrants amending the revised proposals. However, there is only one realistic 'small-scale change' counter proposal: that from [REDACTED] to simply swap Grange Park and Ponders End wards. This would present the advantage of keeping Grange Park and Winchmore Hill wards together in the same constituency, but they would be part of an Edmonton constituency, rather than a Southgate constituency. This counter proposal would not address the wider issues across Enfield and Haringey. To truly 'solve' the issues in Enfield and Haringey, we would likely need to return to the initial proposals for these boroughs (with the West Green / Harringay swap). This, however, would have knock-on consequences for Barnet, for example, a return to the borough being divided into five constituencies - although arguably under better configurations than the initial proposals, with two rather than one constituencies wholly contained within the borough. It is not necessary to consider crossing the A5 again: the issues can all be contained east of the A5. The most viable counter proposal which returns to a constituency pattern similar to the initial proposals is 117026. The main drawback of this counter proposal would probably be the introduction of a different orphan ward in Barnet - Child's Hill - which would result in the division of the Golders Green community. Other counter proposals to consider are 94748 (John Bryant's second counter proposal) and 113662. Given the issues raised in representations, we consider visiting the area would be valuable.</p>
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		<p>With regard to the two Hackney wards included in Tottenham, there is unlikely to be a better alternative than our proposals. Counter proposals involving the Stamford Hill area result in some division of the Stamford Hill community, and other alternatives would create extensive knock-on effects throughout the sub-region.</p>
<p>9 & 10</p>	<p>Camden: Hampstead and Highgate / Holborn and St Pancras</p>	<p><u>Background to revised proposals:</u> Camden contained parts of three constituencies in the initial proposals: West Hampstead and Kilburn, which crossed the boundary with Brent (as per the existing arrangement); Camden Town and St John's Wood, which crossed the boundary with Westminster; and Kentish Town and Bloomsbury, which included an orphan ward from Islington. A key issue was the division of the Hampstead community, which was strongly opposed by residents and led to a campaign in favour of the Conservative Party counter proposal for a Hampstead and Highgate constituency. There were mixed views regarding West Hampstead and Kilburn - some respondents supported the crossing of the A5 (Kilburn High Road) here. The revised proposals sought to address the division of Hampstead by proposing a Hampstead and Highgate constituency based on the Conservative counter proposal with some amendments, notably, the inclusion of Highgate ward from Haringey, and the inclusion of Kentish Town North ward. The remaining Camden wards formed a revised Holborn and St Pancras constituency.</p> <p><u>Revised proposals consultation response:</u> Hampstead and Highgate is well supported (~75 reps) by residents of Hampstead, with ~22 reps forming part of a campaign in support (105598). However, there are mixed views from residents of both the Camden and Haringey Highgate wards. Some support the uniting of the two Highgate wards (106041, 106789) and cite Hampstead Heath as a unifying feature between the communities of Highgate and Hampstead (105417, 100324, 106313). Others see Hampstead Heath as a physical barrier, with evidence that residents of Highgate ward in Camden look south to Kentish Town and Camden Town rather than west to Hampstead (109346, 105457, 113309), while residents of Highgate ward in Haringey share local ties with the rest of their borough, rather than with Hampstead (111575, 112310). There is notable opposition (~55 reps) to the division of the Kentish Town community, since the revised proposals placed Kentish Town North and Kentish Town South wards in different constituencies. A campaign (108654) outlines the community ties within Kentish Town, and ~25 reps suggest that Gospel Oak ward would make a better fit with the Hampstead and Highgate constituency than Kentish Town North ward. However, there are ~7 reps arguing that Gospel Oak should remain in Holborn and St Pancras; 114418 provides community arguments. From the Kilburn area, there is some dismay at our return to using the A5 (Kilburn High Road) as a boundary here, when the road is in fact a local high street (114062, 108895). The revised Holborn and St Pancras constituency is largely supported (see 115868 - Keir Starmer MP), though the Liberal Democrats propose it should be named 'Holborn and Camden Town'.</p>

		<p><u>Commentary:</u> The response to Hampstead and Highgate could be summarised as mostly support from its core (Hampstead) but mostly opposition from its periphery (Kilburn, Kentish Town North, Highgate). The division of Kentish Town is clearly an issue but is unable to be resolved by a simple ward swap. It can, however, be resolved by swapping Kentish Town North with Gospel Oak, and splitting Primrose Hill ward. The revised proposals placed the whole of Primrose Hill in Hampstead and Highgate, but Primrose Hill is ultimately a ward of two parts: the core Primrose Hill area to the east of the hill, and the Swiss Cottage area to the west of the hill. The existing constituency boundary runs down the middle of the ward, and we received some reps stating or implying that the Primrose Hill area should remain part of Holborn and St Pancras (102575, 102546, 104490). Having checked the polling district and electorate data manually (since Camden is a prospective borough), it has proven possible to divide Primrose Hill along its new polling district boundaries - which closely follow the existing constituency boundary - to enable Kentish Town North to join Kentish Town South in the Holborn and St Pancras constituency. Consequently, Gospel Oak would move to Hampstead and Highgate. There is certainly a community ties argument for including the two Kentish Town wards together in the same constituency, but the merits of this will have to be balanced with the implications of a ward split. The final recommendations for Camden are unlikely to be affected by the decisions taken for Enfield, Haringey and Barnet; it is likely to be a binary decision between the revised proposals, and the Primrose Hill ward split option. We consider visiting the area would be valuable. On naming, there is probably not a strong case for changing the Holborn and St Pancras name as proposed by the Liberal Democrats, given the representations in the initial consultation periods advocating the retention of the current constituency name.</p>
11 & 12	<p>Islington: Islington North / Islington South</p>	<p><u>Background to revised proposals:</u> The initial proposals for Islington North included Dalston ward from Hackey, in place of Tufnell Park ward which was transferred to the Kentish Town and Bloomsbury constituency. Islington South was paired with the City of London. There was strong opposition to the joining of the City with Islington rather than Westminster, and residents of Dalston and Tufnell Park wards also objected to the initial proposals for their area. The revised proposals addressed these issues by retaining a Cities of London and Westminster constituency, and by maintaining the existing Islington North constituency wholly unchanged. De Beauvoir ward from Hackney was included in Islington South.</p> <p><u>Revised proposals consultation response:</u> Only 18 reps received from the borough of Islington. There is unanimous support for Islington North, particularly from residents of Tufnell Park ward. Mixed views regarding Islington South, with some opposition from residents of De Beauvoir (~8 reps, e.g. 102497) to being included in an Islington-based constituency. Around 6 respondents argue that the existing constituency name 'Islington South and Finsbury' should be retained, including the Conservative Party and 100795.</p>

		<p><u>Commentary:</u> Unlikely to be a strong case for changing the revised proposals boundaries for Islington, and no further counter proposals have been received for the area. Although including De Beauvoir as an orphan ward in Islington South is not ideal, there are unlikely to be other options for the area which better reflect the statutory factors. As for the name, there is an argument for retaining the existing constituency name, since change to the existing constituency is limited to the addition of De Beauvoir.</p>
13 & 14	<p>Hackney: Hackney North and Stoke Newington / Hackney South and Shoreditch</p>	<p><u>Background to revised proposals:</u> Besides opposition regarding the Hackney wards of Brownswood, Woodberry Down, and Dalston, as previously outlined, the initial proposals for the borough of Hackney were generally supported. Hackney North and Stoke Newington was retained in the revised proposals, while Hackney South and Shoreditch gained Dalston ward in place of De Beauvoir ward.</p> <p><u>Revised proposals consultation response:</u> Minimal response to the two constituencies contained wholly within the borough of Hackney. The Liberal Democrats argue that, if we shorten the constituency name 'Islington South and Finsbury' to simply 'Islington South', we should accordingly shorten the two Hackney constituency names to simply 'Hackney North' and 'Hackney South'.</p> <p><u>Commentary:</u> Given the lack of representations and counter proposals for Hackney, there is unlikely to be a strong argument for changing the revised proposals boundaries. The Liberal Democrats make a good point regarding consistency of naming, however, and the consistency point has been echoed by others such as 100795. This is likely to be a binary decision between retaining the historic borough names in the three relevant constituency names ('and Finsbury' / 'and Stoke Newington' / 'and Shoreditch') or dispensing with the historic borough names.</p>

North West London

1	<p>City & Westminster: Cities of London and Westminster</p>	<p><u>Background to revised proposals:</u> The initial proposals joined the City of London with Islington, and the core Westminster area with two wards from Kensington and Chelsea. This was met with strong opposition. The revised Cities of London and Westminster constituency retained the City's historic pairing with Westminster and did not cross the boundary with Kensington and Chelsea, but rather extended further north than the existing constituency to include the wards of Regent's Park and Abbey Road.</p> <p><u>Revised proposals consultation response:</u> Support for the revised Cities of London and Westminster (~100 reps) with many respondents pleased to see the City maintain its links with Westminster. Residents of St John's Wood (spanning Abbey Road and Regent's Park wards) are generally in favour of being linked with the central Westminster area (e.g. 110215). There is a counter proposal from local councillor Paul Dimoldenberg (115041) to swap Hyde Park ward and Church Street ward between the Queen's Park and Little Venice constituency, and the Cities of London and Westminster constituency, to maintain the A5 as a boundary all the way to Marble Arch / Hyde Park.</p> <p><u>Commentary:</u> Unlikely to be a case for adopting Cllr Dimoldenberg's counter proposal, since it would create a very elongated Queen's Park constituency with little evidence to support this.</p>
2 & 3	<p>Kensington and Chelsea: Chelsea and Fulham / Kensington and Bayswater</p>	<p><u>Background to revised proposals:</u> The initial proposals for Kensington and Chelsea borough generated very strong opposition, with over 1,200 representations opposing the IP constituencies of Fulham and Chelsea West, Kensington and Westbourne, and Westminster and Chelsea East. Key reasons were: 1) division of Chelsea area into two constituencies, 2) division of South Kensington area into three constituencies, 3) division of the borough as a whole into three constituencies, and 4) inclusion of three north Westminster wards in a Kensington-based constituency. The Conservative Party counter proposal for constituencies of Chelsea and Fulham, and Kensington and Bayswater, was well supported. This counter proposal maintained a Chelsea and Fulham constituency much closer to the existing constituency, and paired the Bayswater area with Kensington rather than areas further north. The borough would be divided into two rather than three constituencies. Adopted for the revised proposals.</p> <p><u>Revised proposals consultation response:</u> General support for the revised proposals in Kensington and Chelsea apart from residents of Hans Town (the southern part of Brompton & Hans Town ward) who strongly oppose their inclusion in Kensington and Bayswater, rather than their existing constituency of Chelsea and</p>

		<p>Fulham (~50 reps). Brompton & Hans Town ward is a ward of two halves, formed from parts of the former Brompton ward and Hans Town ward. The Hans Town area identifies as part of Chelsea (and currently sits in the Chelsea and Fulham constituency), whereas the Brompton area identifies as part of South Kensington / Knightsbridge (and currently sits in the Kensington constituency). The revised proposals include Brompton & Hans Town ward in the Kensington and Bayswater constituency; the Milner Street Area Residents' Association (116438 - an organisation based in Hans Town) provides a counter proposal to swap Brompton & Hans Town ward with Redcliffe ward, with the intention of keeping Hans Town with the rest of Chelsea. This counter proposal is supported by ~40 other respondents. Another counter proposal for Kensington and Chelsea borough is provided by 115309. With regard to naming, some respondents (109585, 112658) suggest that Chelsea and Fulham should be renamed 'Fulham and Chelsea' to recognise that Fulham would now be the largest part of the constituency. 110577 proposes 'Kensington and Lancaster Gate' as an alternative to Kensington and Bayswater.</p> <p><u>Commentary:</u> While commanding local support from Hans Town residents, the Milner Street counter proposal is unlikely to represent an improvement on the revised proposals because it would result in greater change overall to the existing pattern of constituencies in the southern part of Kensington and Chelsea borough. It would also 'remove' South Kensington tube station and museums from a Kensington constituency - an issue which generated much opposition in the initial proposals. The counter proposal from 115309 would divide Kensington and Chelsea into three constituencies (again returning to an issue in the initial proposals) and would create a three-borough constituency stretching from the City through Westminster to the western boundary of Kensington and Chelsea. Therefore there are unlikely to be strong arguments for changing the revised proposals boundaries for the constituencies of Chelsea and Fulham, and Kensington and Bayswater. Regarding naming, swapping the order of 'Chelsea' and 'Fulham' in the name of that constituency could be considered, but there may be a case for retaining the existing name 1) because the revised constituency is a clear successor to the existing constituency, and 2) to avoid confusion. As for the Kensington constituency, Bayswater is arguably a larger and better known area than Lancaster Gate.</p>
4, 5 & 6	<p>Brent: Queen's Park and Little Venice / Willesden / Wembley</p>	<p><u>Background to revised proposals:</u> The initial proposals divided the borough of Brent into four constituencies, two of which crossed the A5 (West Hampstead and Kilburn, and Hendon and Golders Green), one of which crossed the boundary with Harrow (Kenton and Wembley West) and one of which was contained wholly in the borough (Brent Central). There was significant opposition to the inclusion of two Harrow wards (Kenton East and Kenton West) in a Brent-based constituency. Some concern was also expressed regarding the potential breaking of local ties across the Wembley area, and the geographical isolation of Alperton ward should it be included in Brent Central. Several counter proposals put forward two constituencies that would</p>

be wholly contained in the borough of Brent, based on the areas of Wembley and Willesden. These also proposed a cross-borough constituency with Westminster (rather than with Camden or Barnet, given the use of the A5 as a boundary). The revised proposals adopted the Liberal Democrats counter proposal for Brent, comprising a Wembley constituency and a Willesden constituency, and the Conservative Party counter proposal for the Brent-Westminster constituency, named Queen's Park and Little Venice in the revised proposals. The revised Wembley constituency encompassed all the core Wembley wards (including Alperton) and did not cross the boundary with Harrow in the Kenton area. The revised Willesden constituency extended further north than the existing Brent Central to include the Kingsbury area.

Revised proposals consultation response: A key issue arising in this consultation is the division of the Harlesden community, due to Harlesden & Kensal Green ward and Roundwood ward (both currently in Brent Central) being included in different constituencies. The revised proposals boundaries are the same as the initial proposals boundaries in this area, but we received only a few responses in the IP consultations. In the RP consultation, however, ~20 reps oppose the division of the Harlesden community, with ~10 reps forming part of a campaign (107769). See also the responses from Harlesden Business Association (108702) and [REDACTED] Brent Central ([REDACTED]) provides a counter proposal for Brent and Harrow to keep Harlesden & Kensal Green and Roundwood wards together in the same constituency. There is also a more localised counter proposal from 109585 to split Harlesden & Kensal Green ward, and transfer Brondesbury Park ward from Willesden to Queen's Park and Little Venice, again with the intention of keeping the Harlesden community united. Besides the Harlesden issue, other arguments against Queen's Park and Little Venice tend to focus on wealth disparity and lack of geographical and social coherence (e.g. 110655, 103195). Conversely, Maida Hill Neighbourhood Forum (115069) argues that the constituency would reflect major and historical transport routes. Several respondents oppose the name Queen's Park and Little Venice, with many alternatives suggested. Some say that Kilburn should be included in the constituency name, but the most popular suggestion overall is 'Queen's Park and Maida Vale' (also put forward by the Conservative Party and Liberal Democrats). Naming is the key issue regarding the Wembley and Willesden constituencies; few responses comment on the boundaries. Respondents including the Conservative Party argue that the existing constituency names of Brent North and Brent Central should be retained, and some respondents propose that Willesden should simply be called 'Brent'. 11221 sets out arguments opposing the Wembley name, and the campaign 107769 sets out arguments opposing the Willesden name.

Commentary: There may be merit in reconsidering the constituency boundaries in the Harlesden area given the evidence received. [REDACTED] counter proposal arguably presents a strong solution for the borough of Brent, closer to the existing pattern of constituencies than the revised proposals, but this comes at the

		<p>expense of an unsatisfactory solution for Harrow which would likely break local ties and cause knock-on effects in the neighbouring boroughs of Hillingdon and/or Ealing. The counter proposal to split Harlesden & Kensal Green ward was based on data from Brent's review of polling districts, rather than the March 2020 electorate, since Brent was a prospective borough. However, having checked the polling district and March 2020 electorate data manually, the counter proposal is valid. This may present a viable alternative to the revised proposals, enabling most of the Harlesden community to remain united in a single constituency - although there is a risk that part of Harlesden south of the town centre area would continue to be divided. This requires further investigation and we consider a visit to the area might be valuable.</p> <p>Regarding constituency naming, there is a case for reconsidering all three names in light of the local opposition.</p> <ul style="list-style-type: none"> • <i>Queen's Park and Little Venice</i>: although Kilburn and West Kilburn would form a significant portion of the constituency, Kilburn also spans the A5 into Camden borough, therefore the constituency would not contain all of the Kilburn community. Nevertheless, Kilburn is likely to be a better-known locality than Queen's Park. Arguments to replace Little Venice with Maida Vale are justifiable. • <i>Wembley / Willesden</i>: there is a case to be made for retaining the existing constituency names Brent North and Brent Central, but the revised constituencies are arguably quite different to the existing constituencies. Brent Central would also extend further north than Brent North under the revised proposals boundaries. Geographically, 'Brent East' and 'Brent West' would be the most accurate names.
7 & 8	<p>Harrow: Harrow East / Harrow West</p>	<p><u>Background to revised proposals</u>: As mentioned, the initial proposals to include the two Kenton wards from Harrow in a Brent-focused constituency generated strong opposition. Response to the initially proposed Stanmore and Edgware constituency, crossing the A5 between Harrow and Barnet, was mixed but predominantly opposition. The initial proposals for the Harrow constituency were generally supported since the constituency was very similar in composition to the existing Harrow West. To maintain the A5 as a boundary, and to address the Kenton issue, a number of counter proposals presented a Harrow East constituency very similar to the existing Harrow East but with the addition of Queensbury ward from Brent (Conservative Party, Liberal Democrats, John Bryant). This constituency was adopted for the revised proposals, and the initial proposals for the Harrow constituency were maintained except for reverting the name to Harrow West.</p> <p><u>Revised proposals consultation response</u>: Positive response to the two Harrow constituencies, with ~45 reps in support of Harrow East and ~6 reps in support of Harrow West. There is little if any opposition to Queensbury becoming an orphan ward. There are some suggestions for different names: the Liberal</p>

		<p>Democrats propose that Harrow East should be ‘Stanmore and Queensbury’, and Harrow West should simply be ‘Harrow’. Other suggestions for Harrow West include ‘Harrow Central’ and ‘Harrow on the Hill’ (112658).</p> <p><u>Commentary:</u> There is unlikely to be a strong case for changing the revised proposals boundaries for Harrow. Similarly, there is unlikely to be a strong case for updating the constituency names because the revised constituencies present only small-scale changes from the existing constituencies. Naming the Harrow West constituency ‘Harrow’ (as we did in the initial proposals) could cause confusion since Harrow is also the name of the borough.</p>
9 & 10	<p>Hillingdon: Ruislip, Northwood and Pinner / Uxbridge and South Ruislip</p>	<p><u>Background to revised proposals:</u> Other than realignment to prospective ward boundaries, the only change to Ruislip, Northwood and Pinner (which spans Harrow and Hillingdon) and Uxbridge and South Ruislip (wholly in Hillingdon) in the initial proposals was the transfer of Ickenham & South Harefield ward from the former to the latter. Little response was received to these two constituencies apart from some opposition to the division of the Harefield community in northwest Hillingdon, owing to the inclusion of Harefield Village ward and Ickenham & South Harefield ward in different constituencies. Some counter proposals including those from John Bryant and Howard Erdunast united the two Harefield wards in Uxbridge and South Ruislip, and consequently transferred Ruislip Manor ward to Ruislip, Northwood and Pinner. This constituency arrangement was opposed by the Conservatives and the Liberal Democrats, however, who contended that it would break local ties in the Ruislip Manor / South Ruislip area and would cause more disruption to existing constituencies than the initial proposals. Assistant Commissioners acknowledged this was a finely balanced decision, but the counter proposal to unite Harefield was adopted for the revised proposals, with a request in the revised proposals report for further views.</p> <p><u>Revised proposals consultation response:</u> Opposition has emerged from Ruislip Manor and South Ruislip, with ~20 reps opposing the separation of these two wards into different constituencies. Local residents such as 107939 and 107755, and the Uxbridge & South Ruislip Conservative Association (113154), among others, outline the strong local ties between Ruislip Manor and South Ruislip that would be broken under the revised proposals. Several respondents including the national Conservative Party advocate a return to the initial proposals; see also [REDACTED] (109760). Councillor Douglas Mills (106475) provides detailed evidence and four potential solutions for the area: 1) initial proposals, 2) splitting Ickenham & South Harefield ward (under the initial proposals) to keep South Harefield united with the rest of Harefield, 3) keep the two Harefield wards together in Ruislip, Northwood and Pinner, and consequently transfer Eastcote ward to Uxbridge and South Ruislip, and 4) keep the two Harefield wards together in Ruislip, Northwood and Pinner, and consequently transfer Ruislip ward to Uxbridge and South Ruislip. Cllr Mills favours option 4. Note</p>

		<p>Howard Erdunast (109466) supports the revised proposals and opposes a return to the initial proposals. There has been no response from the Harefield community. Regarding naming, some respondents (116415, 113553) propose that Uxbridge and South Ruislip be named simply 'Uxbridge'.</p> <p><u>Commentary:</u> The evidence received about Ruislip Manor and South Ruislip is arguably greater in quantity and quality than that received previously about Harefield, and should be considered. There is likely to be a strong case for keeping Ruislip Manor and South Ruislip wards together in the same constituency, which is achieved under any of Cllr Mills' four options. Returning to the initial proposals may present a strong option, especially since the initial proposals were originally supported by all four qualifying political parties, and since we have received no further evidence from the Harefield community. While splitting Ickenham & South Harefield ward (option 2) would keep Harefield together and may present a logical solution on the ground, it is unlikely to meet BCE criteria for ward splitting. Option 3, involving Eastcote ward, is the truly 'least change from existing' whole-ward option, but would mean Eastcote village becomes isolated from its neighbours in Pinner and Ruislip, and would arguably create a geographically incoherent Uxbridge and South Ruislip constituency. Option 4, involving Ruislip ward, would also arguably create geographically incoherent constituencies, especially since there would be no direct links between the eastern and western parts of the Northwood and Pinner constituency under this arrangement. The decision for Hillingdon is likely to be a binary decision between initial and revised proposals. Accordingly, the Lead Commissioner is invited to compare the evidence received about Harefield with the evidence received about Ruislip Manor / South Ruislip:</p> <ul style="list-style-type: none"> • <i>Harefield:</i> 66754 (Howard Erdunast - p.2 of attachment), 63179 (p.2 of written submission), 91174, 91233 • <i>Ruislip Manor / South Ruislip</i> - see reps cited above: 107939, 107755, 113154 (Uxbridge & South Ruislip Conservative Association), 106475 (Cllr Douglas Mills) <p>Regarding naming, there is unlikely to be a strong case for dropping 'and South Ruislip' from the Uxbridge constituency, particularly if we revert to the initial proposals.</p>
11	Hillingdon: Hayes and Harlington	<p><u>Background to revised proposals:</u> The initial proposals retained the existing Hayes and Harlington constituency unchanged except for minor realignment with prospective ward boundaries, and updating the name to Hayes and West Drayton to reflect that West Drayton is now a much larger settlement than Harlington. The revised proposals maintained the initially proposed boundaries, but reverted the name to Hayes and Harlington in light of local response.</p> <p><u>Revised proposals consultation response:</u> Very few comments received. The Liberal Democrats propose the</p>

		<p>constituency should be called ‘Hayes and Heathrow’ or ‘Hayes and West Drayton’.</p> <p><u>Commentary:</u> Unlikely to be any case for changing the revised proposals boundaries, and given that our proposals represent such minimal change from the existing constituency, there is unlikely to be a strong case for recommending a different constituency name.</p>
<p>12, 13 & 14</p>	<p>Ealing: Ealing North / Ealing Southall / Ealing Central and Acton</p>	<p><u>Background to revised proposals:</u> The existing Ealing North constituency was unchanged in the initial proposals except for realignment with prospective ward boundaries. This was well supported. To bring the Ealing Southall constituency within range, we proposed transferring Walpole ward from the Ealing Central and Acton constituency. Two wards from the north of Hammersmith and Fulham borough were consequently included in Ealing Central and Acton. There was strong opposition from the residents of Walpole ward, who contended the initial proposals would break their local ties with the central Ealing area. There was also opposition to our proposed name ‘Southall’, given that many of the residents would identify as being part of Ealing. Response to Ealing Central and Acton was mixed, with some objection to the inclusion of two Hammersmith and Fulham wards, but also some support given the shared local ties across the borough boundary in the East Acton area. Despite the opposition from Walpole, the initial proposals for Ealing were retained as the revised proposals, since counter proposals which kept Walpole with other central Ealing wards would result in significant knock-on effects throughout the rest of the sub-region. However, the revised proposals reinstated the name Ealing Southall to address residents’ concerns over the loss of Ealing identity.</p> <p><u>Revised proposals consultation response:</u> The transfer of Walpole ward from Ealing Central and Acton to Ealing Southall continues to be opposed, though in smaller numbers than at previous consultations (~20 reps, e.g. 107404). There continues to be a balance of views regarding the inclusion of the two Hammersmith wards in Ealing Central and Acton - see, for example, 115366 (Ealing Central and Acton CLP) in support and 98591 in opposition. Minimal response to Ealing North. Ealing Local Authority supports all three constituencies. There are some suggestions for alternative names: 116415 proposes Ealing North be named ‘Greenford and Northolt’, while proposals for the Ealing Central and Acton name include ‘Acton and Central Ealing’ (115366), ‘Ealing and Acton’ (116415), and ‘Ealing Acton’ (113553, 112658).</p> <p><u>Commentary:</u> Unlikely to be strong arguments for changing the revised proposals boundaries in Ealing. On naming, there is unlikely to be a compelling case for changing the Ealing North name, since the proposed constituency is almost unchanged from the existing constituency. However, there may be arguments for reconsidering the Ealing Central and Acton name, since the constituency would ‘lose’ one of its central Ealing wards (Walpole) and extend further east than the existing constituency. ‘Ealing Acton’ may be the most</p>

		<p>suitable alternative name, especially for consistency with Ealing Southall. However, there may also be arguments for retaining the existing name since the commercial centre of Ealing (Ealing Broadway) would still be in the constituency.</p>
15	<p>Hammersmith and Fulham & Hounslow: Hammersmith and Chiswick</p>	<p><u>Background to revised proposals:</u> The initial proposals grouped together the central portion of Hammersmith and Fulham borough with the three Chiswick wards from the borough of Hounslow. This was well supported, with respondents citing many local ties between Hammersmith and Chiswick. There was a counter proposal to transfer Southfield ward (in the borough of Ealing, which contains part of the Chiswick community) to the Hammersmith and Chiswick constituency, and consequently transfer White City and Shepherd's Bush Green wards to Ealing Central and Acton. This was rejected mostly on the grounds that it would create a three-borough constituency. Initial proposals retained as the revised proposals.</p> <p><u>Revised proposals consultation response:</u> Again there is strong support for Hammersmith and Chiswick (~80 reps). Around 25 respondents propose that Southfield ward be included in the constituency, as per the counter proposal mentioned above. Arguments against this counter proposal are reinforced by 108119 (Hammersmith CLP) and 106521 (Cllr Andrew Jones), among others. A different counter proposal (114269) suggests swapping White City ward with Wormholt ward.</p> <p><u>Commentary:</u> Unlikely to be a strong case for changing the revised proposals. No further compelling evidence has been received in support of the Southfield counter proposal, and the arguments against it continue to be stronger than those in favour of it. The counter proposal from 114269 is unlikely to represent an improvement on the revised proposals.</p>
16, 17 & 18	<p>Hounslow & Richmond upon Thames (north): Brentford and Isleworth / Feltham and Heston / Twickenham</p>	<p><u>Background to revised proposals:</u> The transfer of Whitton ward from the Twickenham constituency to the Brentford and Isleworth constituency attracted considerable opposition during the initial proposals consultations (~525 reps). The initial proposals for Feltham and Heston, and Brentford and Isleworth, were otherwise generally supported. Counter proposals or suggestions that kept Whitton ward in Twickenham either breached the permitted electorate range, crossed the River Thames, or resulted in significant disruption elsewhere. The initial proposals were therefore retained as the revised proposals.</p> <p><u>Revised proposals consultation response:</u> There continues to be strong opposition from residents of Whitton (~410 reps). Minimal, if any, response otherwise regarding the constituencies of Brentford and Isleworth, Feltham and Heston, and Twickenham. Munira Wilson, MP for Twickenham (114307), suggests that the Whitton Dene estate (the 'triangle' beneath the A316 - existing polling district BC) should at least remain in</p>

		<p>the Twickenham constituency, even if the rest of Whitton ward does not. This view is echoed by other respondents. Jonathan Stansby (105950) advocates his original counter proposal for Hounslow town centre and Heston, which involves splitting Hounslow West ward. 109585 proposes a reconfiguration of the three constituencies in question, with the three Heston wards included in a 'Heston and Isleworth' constituency, and Heathfield ward being transferred to a 'Feltham and Hanworth' constituency rather than Whitton transferring to Brentford and Isleworth. Requires a split of Hounslow Central ward. On naming, 113553 proposes Brentford and Isleworth be called 'Brentford and Hounslow Town'.</p> <p><u>Commentary:</u> We have not received any further counter proposals which 'solve' the Whitton issue. Munira Wilson's suggestion, while sensible for the Whitton Dene estate, would not address the wider problem for the rest of Whitton ward. Jonathan Stansby's counter proposal would not address the Whitton issue either (the whole ward would still be transferred out of the Twickenham constituency), and while this counter proposal would appear to make sense 'on the ground' in Hounslow town centre, we have not received sufficient evidence to justify the proposed changes - especially since they would involve a ward split. The counter proposal from 109585 would result in arguably greater change to the existing pattern of constituencies than the revised proposals, and again we have received little evidence to justify this approach. While Whitton ward would remain in Twickenham under this counter proposal, its neighbouring ward Heathfield would be transferred to a different constituency, therefore local ties would still be broken in the Whitton community. This may be seen as an example of 'moving rather than solving the problem'. Regarding constituency names, there is unlikely to be a strong argument for renaming Brentford and Isleworth to 'Brentford and Hounslow Town' since the constituency would not encompass all of Hounslow town centre. Overall, despite the ongoing strong opposition from Whitton ward, there is unlikely to be an arrangement which better reflects the statutory factors in this area than the revised proposals.</p>
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South West London

<p>1, 2 & 3</p>	<p>Richmond upon Thames (south), Kingston upon Thames & Merton: Richmond Park and Kingston Central / Surbiton and The Maldens / Wimbledon and Coombe</p>	<p><u>Background to revised proposals:</u> Under the initial proposals, the only change to the existing Richmond Park constituency was the transfer of Coombe Vale ward from Richmond Park to Kingston and Surbiton. The two Kingston upon Thames wards of Old Malden and St. James were transferred to the Wimbledon constituency. There was opposition to the transfer of Old Malden and St. James, and the Conservative Party and Green Party put forward a counter proposal to transfer Coombe Hill and Coombe Vale wards instead to Wimbledon, providing evidence of community ties. This counter proposal also necessitated Grove ward (containing Kingston town centre) being transferred to the Richmond Park constituency. This counter proposal was adopted for the revised proposals albeit with concern over the barrier of the A3 between the Coombe and Wimbledon areas, and concern over the implications for Kingston town centre. The Commission specifically invited further views and evidence in the revised proposals consultation period.</p> <p><u>Revised proposals consultation response:</u> There is strong opposition to the revised proposals for Kingston upon Thames, with ~500 reps in opposition across the borough. Four key themes have arisen: 1) Opposition to the transfer of Grove ward to a Richmond-based constituency (~355 reps); 2) Opposition to the separation of Norbiton ward from Grove ward, since Norbiton looks to Kingston town centre (~75 reps); 3) Opposition to the inclusion of the Coombe wards in Wimbledon (~355 reps); and 4) General consensus that the Surbiton and The Maldens constituency lacks cohesion and identity since it loses its town centre. Note that much of the opposition regarding the Coombe wards stems from the fact that Kingston Hospital is located in Coombe Hill ward. Kingston residents are therefore concerned that their hospital would not be in a Kingston constituency. (Coombe Hill ward, however, is currently in the Richmond Park constituency.) 115597 summarises the Kingston issues from a local resident's perspective. The Liberal Democrats present a counter proposal to transfer the wards of Beverley and Coombe Vale (comprising the New Malden area) to the Wimbledon constituency. Under this counter proposal, the Richmond Park constituency would be the same as at initial proposals. The Kingston and Surbiton constituency would include Grove ward. Detailed arguments against the revised proposals, and advocating this counter proposal, are provided by Sarah Olney, MP for Richmond Park (111447), and Ed Davey, MP for Kingston and Surbiton (113449). The counter proposal is supported by several Lib Dem councillors (e.g. 114369 [REDACTED]) and residents (e.g. 114542). The Chair of Kingston Borough Liberal Democrats (114878) supports the initial proposals. Further reps providing local perspectives:</p> <ul style="list-style-type: none"> ● <i>Norbiton:</i> 114165 (local councillor) ● <i>Coombe Vale:</i> 105463, 109713, 109744 (local residents) ● <i>Coombe Hill:</i> 112745, 113209 (local residents)
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		<p>There is some support for the revised proposals, though this is limited to Conservative Party representatives (e.g. 114166) and some residents of Wimbledon expressing support for the inclusion of Coombe in their constituency (e.g. 110477, 113380). Kingston upon Thames Local Authority (116433) strongly encourages us to align constituency boundaries with the borough's new ward boundaries, for which the Order was made in April 2021.</p> <p><u>Commentary:</u> There is significant evidence to suggest changes to the revised proposals. The Liberal Democrats counter proposal addresses the Grove issue, but there are likely to be questions over whether the two New Malden wards present a better pair to transfer to Wimbledon than the initially proposed Old Malden and St. James wards, given the lack of road links between Beverley ward and its neighbouring wards in the borough of Merton, and again the barrier of the A3. The initial proposals arguably better reflect transport links between the Malden area and the Wimbledon area, and make use of the Hogsmill River as a geographical boundary at the western side of both Old Malden and St. James wards. Both the Liberal Democrats counter proposal and the initial proposals arguably result in some division of the New Malden community. The decision for Kingston upon Thames borough is likely to be a binary choice between the Liberal Democrats counter proposal and the initial proposals. We consider visiting the area might be of value.</p>
4	<p>Merton: Mitcham and Morden</p>	<p><u>Background to revised proposals:</u> The existing Mitcham and Morden constituency was changed by two wards under the initial proposals, gaining Cannon Hill ward from Wimbledon, and losing Longthornton ward to Croydon North. There was notable opposition from residents of both Cannon Hill and Longthornton. The revised proposals retained Longthornton in Mitcham and Morden, and included Cannon Hill in Wimbledon in place of Merton Park ward (thereby adopting the counter proposal of John Bryant and Jonathan Stansby for the borough of Merton). Transferring Merton Park would enable Morden tube station and much of the town centre area to be united in the Mitcham and Morden constituency. The Conservative Party proposed splitting Merton Park between Wimbledon and Mitcham and Morden, and transferring Wandle ward to Mitcham and Morden, but the Assistant Commissioners were not persuaded by the case for splitting Merton Park.</p> <p><u>Revised proposals consultation response:</u> There is very strong opposition to the transfer of Merton Park from Wimbledon to Mitcham and Morden, with ~765 reps in opposition and a petition of 882 signatures (109447). Respondents argue that their community ties are all towards Wimbledon, and although some acknowledge their geographic proximity to Morden as well, they express a lack of community association with Morden (e.g. 102487). Many argue that Cannon Hill made a better candidate to transfer to Mitcham and Morden since the ward is geographically more distant from Wimbledon town centre than Merton Park. See 116242, 114378 and 115656 for examples of reps providing detailed community ties arguments and alternative suggestions.</p>

		<p>Stephen Hammond, MP for Wimbledon (110467) advocates splitting both Merton Park and Wandle wards.</p> <p><u>Commentary:</u> There is a strong case for reconsidering the evidence received for this constituency. Numerically, it is possible to transfer either West Barnes, Cannon Hill, Merton Park, or Abbey ward from Wimbledon to Mitcham and Morden, but it is not possible to transfer Wandle ward alone (since the ward has too few electors). West Barnes and Abbey wards were previously considered in the development of the initial proposals, but these options were rejected. It is possible to split Cannon Hill ward between the Wimbledon and Mitcham and Morden constituencies, and it is also possible to split <i>both</i> Cannon Hill and Merton Park to include the southern portions of both wards in Mitcham and Morden. It is not possible to split Merton Park alone (hence why the original Conservative Party counter proposal also required the transfer of Wandle ward). The case for ward splitting may not be particularly strong in this area, since ward splits would not fully solve the problem and would not present any wider benefits. Ultimately, the decision here is likely to be a binary choice between the transfer of either Cannon Hill ward or Merton Park ward. We consider visiting the area might be of value.</p>
5 & 6	Sutton: Carshalton and Wallington / Sutton and Cheam	<p><u>Background to revised proposals:</u> In the initial proposals the two Sutton constituencies were changed only slightly from the existing constituencies to realign with prospective ward boundaries in the borough. This was well supported. Retained as revised proposals.</p> <p><u>Revised proposals consultation response:</u> Minimal response: two reps in support.</p> <p><u>Commentary:</u> Unlikely to be any case for changing the revised proposals for these constituencies.</p>
7, 8 & 9	Wandsworth: Battersea / Putney / Tooting	<p><u>Background to revised proposals:</u> The initial proposals treated Wandsworth, like Sutton, as a coterminous borough. We proposed maintaining the existing Tooting constituency wholly unchanged. We proposed splitting Fairfield ward between the Battersea and Putney constituencies to bring these two constituencies within the permitted electorate range while preventing a complete reconfiguration of all three existing Wandsworth constituencies. This approach was generally well supported. Initial proposals retained as revised proposals.</p> <p><u>Revised proposals consultation response:</u> Limited response across the borough of Wandsworth. Some representations (e.g. 111205 - Wandsworth Conservatives) continue to encourage us to consider the new ward boundaries in the borough, for which the Order was made in April 2021. Wandsworth Local Authority (98294) strongly encourages us to incorporate the northern tip of the existing Earlsfield ward into the Putney</p>

		<p>constituency to avoid the creation of a polling district containing one elector, which they say would compromise the secrecy of the ballot, since this elector would require a separate ballot box.</p> <p><u>Commentary:</u> There may be a case for considering the arguments outlined by Wandsworth Local Authority, given their concerns over elector anonymity. We will though investigate this argument further with the team in DLUHC that lead on the policy of running elections. However, these arguments will have to be weighed against BCE policy regarding the use of post-December 2020 ward boundaries, especially when compared with requests from other Local Authorities and the need for consistency across the region. Aside from this, there is unlikely to be a strong case for changing the revised proposals for the borough of Wandsworth.</p>
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South Central London

<p>1, 2 & 3</p>	<p>Croydon: Croydon East / Croydon South / Croydon West and South Norwood</p>	<p><u>Background to revised proposals:</u> The initial proposals for Croydon comprised two constituencies contained wholly within the borough (Croydon East and Croydon South), and two constituencies crossing into neighbouring boroughs: Croydon North included Longthornton ward from the borough of Merton, and Norwood included two wards from the borough of Lambeth. We proposed dividing Waddon ward between Croydon North and Croydon South to bring Croydon South within the permitted electorate range, and avoid a potential ripple effect requiring multiple ward splits in Lambeth. The initial proposals received a mixed response. There was strong support for Croydon South, but there was opposition from the Woodside and Addiscombe community regarding the proposed inclusion of Woodside ward in the Norwood constituency (i.e. with wards to its north) rather than the Croydon East constituency with its Addiscombe neighbours to the south. Many respondents cited the hard physical barrier of the Southern rail line (at this point a 15-track railway line) between Woodside ward and South Norwood ward to its north. There was, however, also some evidence of community ties between Woodside and South Norwood. The revised proposals aimed to address the concerns of Woodside residents by splitting Woodside ward, and including all but one polling district in Croydon East i.e. with the Addiscombe community. Polling district WDS1 was included in a revised Croydon West and South Norwood constituency. This obviated the need for Waddon ward to be split, but it necessitated Park Hill and Whitgift ward (included in Croydon East in the initial proposals) being transferred to Croydon South.</p> <p><u>Revised proposals consultation response:</u> There is opposition to the transfer of Park Hill & Whitgift ward to Croydon South (~45 reps) on the grounds that the ward's community ties are with Addiscombe, not with areas to its south. Reps such as 111991, 114177 and 114938 focus on transport connections through the ward to support their arguments. The revised proposals for the Woodside area have received a more mixed response. There is some support for <i>most</i> of Woodside ward being kept with the Addiscombe community in Croydon East (~15 reps), but there is also opposition to the splitting of the ward (~15 reps) - see 112901 for example, and a petition of 101 signatures (115248). Conversely, some local councillors argue that Woodside ward belongs with South Norwood, not with Addiscombe. The Conservative Party present a counter proposal for Croydon which 1) keeps Park Hill & Whitgift in Croydon East, 2) transfers Woodside to Croydon West and South Norwood (with the potential for the ward to be split in a different way, polling district WDS6 remaining in Croydon East), and 3) splits Waddon ward, with the southern portion of the ward (polling districts WDN4-6) included in Croydon South, and the remainder of the ward included in Croydon West and South Norwood. See 108411 (local councillor) for detailed evidence on Park Hill & Whitgift, and Woodside / South Norwood, and 114092 (local councillor) and 114300 (Croydon Conservatives) for further detailed evidence and</p>
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		<p>arguments in support of the counter proposal. We have received a number of other counter proposals for the borough of Croydon, including whole-ward solutions from the Liberal Democrats, 111554 (John Bryant) and 115143. Counter proposals from 101063 (John Cartwright) and 113512 (Andrew Pelling - former MP for Croydon Central) put forward alternative ward-split solutions.</p> <p>Regarding constituency names, only one rep (107623) opposes the Croydon East and Croydon South names, and puts forward 'Addington and Addiscombe', and 'Cousdon and Purley' respectively. There is more opposition to the Croydon West and South Norwood name, with the most popular alternative being 'Croydon West'. Other proposals for this constituency are 'Croydon North' and 'Croydon and South Norwood'.</p> <p><u>Commentary:</u> Given the opposition regarding Park Hill & Whitgift ward, and the continuing controversy surrounding Woodside, there is a case for reconsidering the revised proposals in the borough. Many of the counter proposals, however, present notably different constituency arrangements (e.g. Liberal Democrats, 111554, 115143, 113512) and are likely to introduce new issues elsewhere. The Conservative Party counter proposal presents the most plausible alternative to the revised proposals: it keeps Park Hill & Whitgift in Croydon East, and replaces the Woodside split with a logical split of Waddon ward. (The potential split of Woodside under this counter proposal is unlikely to be justifiable.) However, this counter proposal requires careful assessment in the Woodside area, since it would reverse our previous decision to keep Woodside with the wards to the south of the railway line (following our site visit to the area). The Lead Commissioner would need to be persuaded by convincing evidence that Woodside has ties across the railway line to the north. As such, the Lead Commissioner is invited to assess the following reps from all three consultation periods, to compare the evidence regarding community ties in Woodside ward.</p> <ul style="list-style-type: none"> • <i>Woodside's links are south to Addiscombe:</i> 85520 (██████████ Croydon Central), 84424 (Cllr Mike Bonello), 83699 (Cllr Hamida Ali), 80485 (local resident), 97653 (local resident: Merton Day 1 Part 3 - see 11:45 onwards) • <i>Woodside's links are north to South Norwood:</i> 97733 (local resident: Bromley Day 2 Part 10), 97726 (Cllr Lynne Hale: Bromley Day 2 Part 6, see 29:37-30:36), 108411 (local councillor - cited above), 114300 (Croydon Conservatives - cited above - see paras 33-56), 116179 (local councillor) <p>On constituency names, there are unlikely to be strong arguments for changing the Croydon East and Croydon South names. There may be a case to reconsider the Croydon West and South Norwood name, however, given some local opposition.</p>
4	Croydon & Lambeth: Streatham and Norbury	<p><u>Background to revised proposals:</u> The initially proposed Norwood constituency, comprising five Croydon wards and two Lambeth wards, received strong opposition from the two Lambeth wards in particular. Residents of these wards - encompassing much of the West Norwood community - contended they had no</p>

		<p>community ties with Croydon and were geographically divided from Croydon by the Norwood Ridge. The revised proposals maintained a constituency that crossed the Croydon-Lambeth boundary, but in the Streatham area rather than the West Norwood area. A site visit demonstrated no topographical boundaries between north Croydon and Streatham, and better transport links.</p> <p><u>Revised proposals consultation response:</u> Around 15 reps in opposition to Streatham and Norbury, most of which oppose the pairing of the Streatham area (Lambeth) with the Norbury area (Croydon) (e.g. 103651). Some reps propose different names for the constituency, including 'Streatham and Upper Norwood' (98559), 'Croydon North and Streatham' (114272, 114300) and 'Streatham and Croydon North' (112658).</p> <p><u>Commentary:</u> There is unlikely to be a case for changing the revised proposals boundaries for Streatham and Norbury: although there is some opposition, the evidence is not extensive and no realistic counter proposals have been received. There may be a case for reconsidering the name, however, since two of the four Croydon wards in this constituency would not necessarily identify as Norbury.</p>
5, 6, 7, 8, 9 & 10	<p>Lambeth & Southwark: Lambeth Central / Vauxhall / Peckham / Dulwich and West Norwood / Bermondsey and Old Southwark / Lewisham West and East Dulwich</p>	<p><u>Background to revised proposals:</u> The initial proposals for the borough of Lambeth (excluding those wards contained in the Norwood constituency) comprised a Streatham constituency, based largely on the existing Streatham constituency; a Clapham and Brixton constituency spanning the central part of the borough; and a Vauxhall and Camberwell constituency including three wards from the borough of Southwark. We then proposed two constituencies contained wholly within Southwark - Bermondsey and Borough, and Peckham - and a Dulwich and Sydenham constituency which crossed between Southwark and Lewisham. There was strong opposition (over 400 reps) to the division of the existing Dulwich and West Norwood constituency into four different constituencies, and there was also notable opposition (including an online petition of over 800 signatures) to the division of the Camberwell community. There was smaller scale opposition from residents of St. George's ward at being separated from Elephant and Castle. Elsewhere the initial proposals received a mixed response. The Labour Party counter proposal for Lambeth and Southwark was adopted for the revised proposals: this included a Dulwich and West Norwood constituency based on the existing constituency, a different cross-borough arrangement for Southwark and Lewisham, and a more compact arrangement for the centre of Lambeth. This counter proposal also addressed the feedback from St. George's ward. However, the Camberwell community would still be divided (into the three constituencies of Vauxhall, Peckham, and Dulwich and West Norwood). The Assistant Commissioners recognised that no counter proposal provided an ideal arrangement for Lambeth and Southwark, but they felt the Labour Party counter proposal best reflected the statutory factors overall.</p>

Revised proposals consultation response: There continues to be strong opposition to the division of the Camberwell community, with ~260 reps objecting to the Camberwell area being included in three different constituencies. Around 70% of the reps about Camberwell also specifically oppose the omission of Camberwell from a constituency name. A campaign of ~55 reps focuses on the name issue (106862). Many respondents express disappointment that their concerns raised at the initial proposals consultation, particularly the petition, did not result in a revised pattern of constituencies better reflecting the Camberwell community. See responses from 113176 (SE5 Forum for Camberwell), 115317 (The Camberwell Society), 115118 (local resident), and 117121 (which attaches the email and newspaper articles circulated in Camberwell during the revised proposals consultation period). 112499 exemplifies the responses from Champion Hill residents, who are included in the revised Dulwich and West Norwood constituency, rather than in the Peckham constituency as at initial proposals. Regarding naming, even if there were no change to the revised proposals boundaries, suggestions for the name of the Peckham constituency include: 'Camberwell and Peckham' (the existing name, advocated in campaign 106862), 'Peckham and Camberwell' (110748), 'Peckham and East Camberwell' (108314, 116154), and 'Camberwell, Peckham and Walworth' (109938). Suggestions for the Vauxhall constituency include: 'Camberwell and Vauxhall' (advocated in campaign 106862), 'Vauxhall and West Camberwell' (116154), and 'Waterloo' (101341). Besides opposition from the residents of Champion Hill, there is overall support for the revised Dulwich and West Norwood constituency (~80 reps), since this addresses feedback from the communities of Herne Hill, West Dulwich, West Norwood, Gipsy Hill and Dulwich. One respondent (104895) suggests an alternative name of 'Dulwich and Brixton' for this constituency.

A key theme arising in representations from the borough of Lambeth is concern that our proposals use the December 2020 ward boundaries, given that Lambeth now has new wards (for which the Order was made in January 2022). Around 20 respondents also oppose the name of the Lambeth Central constituency, arguing that the name does not reflect the communities in this area, and could cause confusion with the name of the borough. Various alternatives have been proposed, but the three most popular are: 1) 'Clapham and Brixton Hill' (see 100543; also proposed by Labour Party and Green Party), 2) 'Clapham', and 3) 'Brixton and Clapham'. Some respondents suggest 'Brixton West' might be an appropriate modifier to indicate that the constituency would not include the entirety of Brixton. The submission from [REDACTED] Streatham (115494), summarises the Lambeth issues and provides a counter proposal to align the constituency boundaries with the new ward boundaries across the borough. Some reps (e.g. 104159) focus specifically on the Clapham Park Estate, arguing that the new ward boundaries should be used in this area to ensure the estate is included in a single constituency.

Around 10 reps oppose the revised Lewisham West and East Dulwich constituency (e.g. 100371), while ~5 reps are in support. Again there are suggestions for alternative names: 'East Dulwich and Forest Hill'

		<p>(104688), 'Forest Hill and East Dulwich' (99403), 'Sydenham and East Dulwich' (99403), and 'Lewisham West and Dulwich Hill' (113662). The revised Bermondsey and Old Southwark constituency has elicited little response other than a proposal to change the name to 'Bermondsey and North Southwark' (114729 and Liberal Democrats).</p> <p>The Liberal Democrats and John Bryant (111554) present the same counter proposal for five constituencies in Lambeth and Southwark, involving a 'rotation' of five wards between the revised constituencies of Vauxhall, Peckham, Lewisham West and East Dulwich, Dulwich and West Norwood, and Lambeth Central. The respondents argue that the counter proposal would reunite Camberwell, avoid a division of Nunhead, keep East Dulwich together with Dulwich, unite all of Brixton, and unite Stockwell.</p> <p><u>Commentary:</u> The division of Camberwell is arguably the biggest issue across the boroughs of Lambeth and Southwark. The counter proposal from the Liberal Democrats and John Bryant is appealing in that it unites the two core Camberwell wards (Camberwell Green and St. Giles) and would therefore address many residents' concerns. The uniting of the Brixton area and Stockwell area also appears to present advantages in terms of community ties, though we received very few (if any) reps from residents actually opposing the revised proposals for Stockwell and Brixton. (It is worth noting that Brixton is divided into three constituencies under the existing pattern, whereas the revised proposals would divide it into only two constituencies.) As for East Dulwich: at first glance it seems logical to unite this area with Dulwich, but there is a risk that the East Dulwich community itself would be divided under this counter proposal, since East Dulwich spans both Goose Green and Dulwich Hill wards. The counter proposal would also divide the core Peckham area, as Rye Lane ward and Nunhead & Queen's Road ward would be included in different constituencies. The counter proposal would additionally create an orphan ward (Newington) in the borough of Southwark. Therefore, while presenting advantages in some areas, this counter proposal may have detrimental effects in other areas - and the pros and cons as compared to the revised proposals will need to be considered. Alternative constituency schemes which unite Camberwell but maintain the revised proposals around East Dulwich and Peckham are possible, but initial investigations show that these require two ward splits. Ultimately the recommendations for constituency boundaries in Lambeth and Southwark are likely to come down to a binary decision between the revised proposals, and the Liberal Democrats / John Bryant counter proposal. Although some detailed arguments have been made for aligning Lambeth constituency boundaries with the new ward boundaries across the borough, there is unlikely to be a case for pursuing this, given our legislative requirements and policy.</p> <p>Regarding naming, there is a case for reconsidering the names of the constituencies across Lambeth and Southwark in light of the feedback received - particularly the Lambeth Central name.</p>
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<p>11 & 12</p>	<p>Lewisham: Lewisham East / Lewisham North and Deptford</p>	<p><u>Background to revised proposals:</u> The initial proposals for Lewisham comprised two constituencies contained wholly within the borough (Lewisham East, and Deptford) and the Dulwich and Sydenham constituency spanning the Lewisham-Southwark boundary. Lewisham East and Deptford were unchanged from the existing constituencies except for realignment with prospective local government ward boundaries, and were generally supported. The revised proposals adopted the Labour Party counter proposal for Lewisham (which was also supported by respondents in the initial proposals consultations). This counter proposal represented more change from the existing constituencies than the initial proposals, but those changes were considered to be justified - and it would not have been possible to adopt Labour's counter proposal for Lambeth and Southwark without also adopting it for Lewisham.</p> <p><u>Revised proposals consultation response:</u> Minimal response to the revised proposals for Lewisham other than comments on the names of the constituencies. The Liberal Democrats propose 'Lewisham South East' rather than Lewisham East, while 'Lewisham North' is the most popular alternative for Lewisham North and Deptford. See 106603 for arguments in favour of 'Lewisham North', and 108092 for arguments counteracting this and favouring 'Deptford' instead. Other respondents suggest returning to the existing constituency name of 'Lewisham Deptford'.</p> <p><u>Commentary:</u> Unlikely to be a strong case for changing the revised proposals boundaries for the borough of Lewisham. Regarding names, although 'Lewisham South East' would technically be a more accurate geographic descriptor than Lewisham East, there is unlikely to be a compelling case for changing this existing constituency name. There is probably a stronger case for revising the Lewisham North and Deptford name given the evidence received. Simply 'Lewisham North', or the existing name 'Lewisham Deptford', are likely to present the most viable options. The decision here may need to be taken in conjunction with the decisions regarding Islington South and the Hackney constituencies, for consistency purposes.</p>
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South East London

<p>1 & 2</p>	<p>Greenwich & Bexley: Greenwich and Woolwich / Erith and Thamesmead</p>	<p><u>Background to revised proposals:</u> The initial proposals maintained the existing Greenwich and Woolwich constituency unchanged except for the transfer of Glyndon ward to the Erith and Thamesmead constituency. Erith and Thamesmead additionally gained Shooters Hill ward (currently in the Eltham constituency), but was otherwise unchanged except for realignment to new ward boundaries in Bexley borough. There was strong support for Greenwich and Woolwich, but Erith and Thamesmead received a mixed response, particularly in the Plumstead and Shooters Hill areas. Residents of Plumstead (spanning the three existing wards of Glyndon, Plumstead and Shooters Hill) welcomed the initial proposals since they would unite the Plumstead community. However, residents of Shooters Hill in the eastern part of Shooters Hill ward strongly opposed being transferred from Eltham to Erith and Thamesmead. Several counter proposals were received for the boroughs of Greenwich and Bexley. Some respondents said we should consider using Greenwich’s new ward boundaries (for which the Order was made in December 2021) because they include the Plumstead and Shooters Hill communities in separate and distinct wards. Although recognising the issues in the Shooters Hill area, the Assistant Commissioners considered no alternative would better reflect the statutory factors than the initial proposals. Retained as revised proposals.</p> <p><u>Revised proposals consultation response:</u> There continues to be support for the Greenwich and Woolwich constituency (~30 reps). Similar issues arise in relation to Plumstead and Shooters Hill: the Shooters Hill community is opposed to being included in Erith and Thamesmead (~15 reps), and a number of respondents advocate the use of Greenwich’s new ward boundaries in this area. 101539 proposes dividing the existing Shooters Hill ward between Erith and Thamesmead, and Greenwich and Woolwich, using the new ward boundaries. Some reps focus on Glyndon, arguing that the western part of the existing Glyndon ward is very much part of the Woolwich community; 116226 provides a counter proposal to divide this ward along the new ward boundaries so that the ‘Woolwich part’ of the ward can be included in the Greenwich and Woolwich constituency. Regarding naming, two respondents suggest that Plumstead should be included in the Erith and Thamesmead constituency name: suggestions are ‘Plumstead and Erith’ (106719) and ‘Thamesmead and Plumstead’ (113553).</p> <p><u>Commentary:</u> There is unlikely to be a strong case for changing the revised proposals. Although it may make sense ‘on the ground’ to use Greenwich’s new boundaries in the Shooters Hill and Glyndon areas, potentially better reflecting communities, these arguments were rejected at the revised proposals development stage, and the representations received in this latest consultation do not necessarily provide any new or compelling arguments to encourage us to consider splitting existing wards in this area. As for naming, there is a case for</p>
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		including Plumstead in the constituency name, but this would have to be weighed against the benefits of retaining the existing name Erith and Thamesmead.
3 & 4	Bexley: Bexleyheath and Crayford / Old Bexley and Sidcup	<p><u>Background to revised proposals:</u> The initial proposals for two constituencies contained wholly in the borough of Bexley were based largely on the existing constituencies, albeit with boundaries realigned to new local government ward boundaries. These were well supported. Retained as revised proposals except for reverting the initially proposed name ‘Sidcup and Welling’ to the existing name Old Bexley and Sidcup.</p> <p><u>Revised proposals consultation response:</u> Minimal response to the two Bexley constituencies. Some reps suggest that Welling should be included in the name of the Old Bexley and Sidcup constituency to recognise the Welling community which would now be wholly contained in the constituency. 107092 proposes ‘Old Bexley, Sidcup and Welling’, which was also popular at initial proposals consultation. There is a counter proposal (117074) to split West Heath ward and St Mary's & St. James ward in Bexley borough so that Shooters Hill ward does not need to join the Erith and Thamesmead constituency.</p> <p><u>Commentary:</u> Unlikely to be a strong case for changing the revised proposals boundaries. There is no compelling argument for splitting wards in Bexley, and the counter proposal would likely result in significant knock-on consequences throughout the rest of South East (and probably South Central) London. There is unlikely to be a strong case for including Welling in the name of the Old Bexley and Sidcup constituency, since this would result in a long constituency name which was previously considered and rejected by Assistant Commissioners, in favour of retaining the existing constituency name.</p>
5	Greenwich & Bromley: Eltham and Chislehurst	<p><u>Background to revised proposals:</u> Due to the grouping of Bromley, Bexley and Greenwich boroughs as a sub-region in the initial proposals, and given Bromley’s entitlement to 3.24 constituencies, one constituency was required to cross the boundary from Bromley to a neighbouring borough. We proposed an Eltham and Chislehurst constituency which crossed from Bromley to Greenwich, pairing Bromley’s two Chislehurst wards with most of the existing Eltham constituency. This was strongly opposed at consultation, with respondents citing limited community, social or transport connections between the Eltham and Chislehurst areas. There was considerable support for the Conservative Party counter proposal which joined the Chislehurst area with other Bromley wards and just one ward from Greenwich. However, some of the main arguments put forward in support of this counter proposal also applied to the initial proposals (such as the uniting of the Mottingham community across the Bromley-Greenwich boundary), and there was evidence that the counter proposal would break ties in New Eltham. After careful consideration, initial proposals were retained as revised proposals.</p>

		<p><u>Revised proposals consultation response:</u> There continues to be opposition to Eltham and Chislehurst (~40 reps) on the basis of limited connection between the two areas. See Clive Efford, MP for Eltham (115680).</p> <p><u>Commentary:</u> Unlikely to be a case for changing the revised proposals at this stage, given the lack of new and substantive evidence or counter proposals.</p>
6, 7 & 8	<p>Bromley: Beckenham and Penge / Bromley and Biggin Hill / Orpington</p>	<p><u>Background to revised proposals:</u> The initial proposals put forward three constituencies wholly within the borough of Bromley. Orpington was based on the existing Orpington constituency but gained Cray Valley West ward in place of Petts Wood and Knoll ward, which was transferred to the Bromley constituency. The core Bromley town area plus two wards to its south comprised the rest of the Bromley constituency. The Beckenham constituency joined together the central Beckenham area with Penge. A key issue in the borough of Bromley was the transfer of Petts Wood and Knoll ward from Orpington to Bromley, generating ~115 reps in opposition. Elsewhere the initial proposals received a mixed response. Following site visits, potential ward-split solutions were found to address the feedback from Petts Wood and Knoll. One of these solutions involved splitting both Shortlands ward (to the west of Bromley town) and Petts Wood and Knoll ward itself. Another solution kept Petts Wood and Knoll entirely with Orpington by pairing Bromley town with Biggin Hill, and dividing Darwin ward using an existing polling district boundary and the <i>new</i> ward boundaries surrounding Biggin Hill itself. The Biggin Hill solution was adopted for the revised proposals. The initially proposed Beckenham constituency was retained in the revised proposals except for updating its name to Beckenham and Penge.</p> <p><u>Revised proposals consultation response:</u> Limited response from the Biggin Hill community. One respondent (103183) supports the revised proposals, while another (101777) says the character of Biggin Hill fits more naturally with Orpington, its current constituency. A couple of respondents from the Orpington constituency (99915, 100287) note that their area is affected by the flight path from Biggin Hill airport, and are therefore concerned that if the airport was moved to a different constituency (as per the revised proposals), they would not be able to raise issues with the MP responsible for the airport. A campaign (109544) of ~20 reps from the Bromley area opposes the Bromley and Biggin Hill constituency on the grounds that it pairs a densely populated urban area, Bromley, with the more sparsely populated and rural Biggin Hill area. This campaign supports the alternative proposal to split Shortlands, and Petts Wood and Knoll wards, arguing that this option better reflects community ties. Regarding naming, the Liberal Democrats propose that Bromley and Biggin Hill could be named 'Bromley Central and Biggin Hill'. As for the Beckenham and Penge constituency, one respondent (111587) is concerned that the constituency name might be abbreviated to BnP which could</p>

		<p>be mistaken for the British National Party. Alternative suggestions are 'Penge and Beckenham' (111587) and simply 'Beckenham' (98386).</p> <p><u>Commentary:</u> There may be a case for reconsidering the alternative two-ward split proposal in light of the arguments presented in the campaign. However, this would need to be balanced with the initial proposals response from Petts Wood and Knoll ward and the reasoning that led to the adoption of the Biggin Hill solution at the revised proposals stage. A lack of response from the Biggin Hill area may imply tacit support for the revised proposals but we cannot be certain of this. The Lead Commissioner is invited to compare the following representations:</p> <ul style="list-style-type: none"> ● <i>Opposition to the transfer of Petts Wood and Knoll from Orpington to Bromley:</i> 86097 (campaign from local residents: ~30 reps), 68240 (Gareth Bacon, MP for Orpington) ● <i>Suggestions to split Petts Wood and Knoll ward:</i> 56991, 64153, 66866 ● <i>Suggestions to split Darwin ward:</i> 73697, 85350 ● <i>Support for the two-ward split proposal:</i> 109544 (campaign cited above) <p>Regarding the naming of constituencies, there is unlikely to be a strong case for changing the name of Beckenham and Penge since this name was put forward and supported at initial proposals consultation. There may be a case for considering 'Bromley Central' in the Bromley-focused constituency to avoid potential confusion with the borough name.</p>
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