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Elections Committee Members

Members of the committee, listed below, are summoned to attend the meeting to be held on Thursday, 8 September 2016.

Barry Quirk, Chief Executive



Councillor Alan Hall	
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Councillor Stella Jeffrey	
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Councillor John Paschoud	
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Councillor Roy Kennedy	
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Councillor Suzannah Clarke	
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Councillor Jamie Milne	
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Elections Committee Agenda

Thursday, 8 September 2016
7.00 pm, Council Chamber - Civic Suite
Civic Suite
Lewisham Town Hall
London SE6 4RU

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Part 1

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Agenda Item 1

ELECTIONS COMMITTEE		
Report Title	ELECTION OF CHAIR & VICE CHAIR	
Key Decision	No	Item No. 1
Ward	n/a	
Contributors	CHIEF EXECUTIVE	
Class	Part 1	Date: 8 September 2016

Recommendation

To appoint a Chair of the Committee for the Municipal Year 2015/16.

Agenda Item 2

ELECTIONS COMMITTEE		
Report Title	DECLARATIONS OF INTEREST	
Key Decision	No	Item No. 1
Ward	n/a	
Contributors	Chief Executive	
Class	Part 1	Date: 8 September 2016

Members are asked to declare any personal interest they have in any item on the agenda.

1 Personal interests

There are three types of personal interest referred to in the Council's Member Code of Conduct :-

- (1) Disclosable pecuniary interests
- (2) Other registerable interests
- (3) Non-registerable interests

2 Disclosable pecuniary interests are defined by regulation as:-

- (a) Employment, trade, profession or vocation of a relevant person* for profit or gain
- (b) Sponsorship –payment or provision of any other financial benefit (other than by the Council) within the 12 months prior to giving notice for inclusion in the register in respect of expenses incurred by you in carrying out duties as a member or towards your election expenses (including payment or financial benefit from a Trade Union).
- (c) Undischarged contracts between a relevant person* (or a firm in which they are a partner or a body corporate in which they are a director, or in the securities of which they have a beneficial interest) and the Council for goods, services or works.
- (d) Beneficial interests in land in the borough.
- (e) Licence to occupy land in the borough for one month or more.
- (f) Corporate tenancies – any tenancy, where to the member's knowledge, the Council is landlord and the tenant is a firm in which the relevant person* is a

partner, a body corporate in which they are a director, or in the securities of which they have a beneficial interest.

- (g) Beneficial interest in securities of a body where:-
- (a) that body to the member's knowledge has a place of business or land in the borough; and
 - (b) either
 - (i) the total nominal value of the securities exceeds £25,000 or 1/100 of the total issued share capital of that body; or
 - (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person* has a beneficial interest exceeds 1/100 of the total issued share capital of that class.

*A relevant person is the member, their spouse or civil partner, or a person with whom they live as spouse or civil partner.

(3) Other registerable interests

The Lewisham Member Code of Conduct requires members also to register the following interests:-

- (a) Membership or position of control or management in a body to which you were appointed or nominated by the Council
- (b) Any body exercising functions of a public nature or directed to charitable purposes, or whose principal purposes include the influence of public opinion or policy, including any political party
- (c) Any person from whom you have received a gift or hospitality with an estimated value of at least £25

(4) Non registerable interests

Occasions may arise when a matter under consideration would or would be likely to affect the wellbeing of a member, their family, friend or close associate more than it would affect the wellbeing of those in the local area generally, but which is not required to be registered in the Register of Members' Interests (for example a matter concerning the closure of a school at which a Member's child attends).

(5) Declaration and Impact of interest on member's participation

- (a) Where a member has any registerable interest in a matter and they are present at a meeting at which that matter is to be discussed, they must declare the nature of the interest at the earliest opportunity and in any

event before the matter is considered. The declaration will be recorded in the minutes of the meeting. If the matter is a disclosable pecuniary interest the member must take no part in consideration of the matter and withdraw from the room before it is considered. They must not seek improperly to influence the decision in any way. **Failure to declare such an interest which has not already been entered in the Register of Members' Interests, or participation where such an interest exists, is liable to prosecution and on conviction carries a fine of up to £5000**

- (b) Where a member has a registerable interest which falls short of a disclosable pecuniary interest they must still declare the nature of the interest to the meeting at the earliest opportunity and in any event before the matter is considered, but they may stay in the room, participate in consideration of the matter and vote on it unless paragraph (c) below applies.
- (c) Where a member has a registerable interest which falls short of a disclosable pecuniary interest, the member must consider whether a reasonable member of the public in possession of the facts would think that their interest is so significant that it would be likely to impair the member's judgement of the public interest. If so, the member must withdraw and take no part in consideration of the matter nor seek to influence the outcome improperly.
- (d) If a non-registerable interest arises which affects the wellbeing of a member, their, family, friend or close associate more than it would affect those in the local area generally, then the provisions relating to the declarations of interest and withdrawal apply as if it were a registerable interest.
- (e) Decisions relating to declarations of interests are for the member's personal judgement, though in cases of doubt they may wish to seek the advice of the Monitoring Officer.

(6) Sensitive information

There are special provisions relating to sensitive interests. These are interests the disclosure of which would be likely to expose the member to risk of violence or intimidation where the Monitoring Officer has agreed that such interest need not be registered. Members with such an interest are referred to the Code and advised to seek advice from the Monitoring Officer in advance.

(7) Exempt categories

There are exemptions to these provisions allowing members to participate in decisions notwithstanding interests that would otherwise prevent them doing so. These include:-

- (a) Housing – holding a tenancy or lease with the Council unless the matter relates to your particular tenancy or lease; (subject to arrears exception)
- (b) School meals, school transport and travelling expenses; if you are a parent or guardian of a child in full time education, or a school governor unless the matter relates particularly to the school your child attends or of which you are a governor;
- (c) Statutory sick pay; if you are in receipt
- (d) Allowances, payment or indemnity for members
- (e) Ceremonial honours for members
- (f) Setting Council Tax or precept (subject to arrears exception)

Agenda Item 3

MINUTES OF THE ELECTIONS COMMITTEE

23 June 2015 at 7.30 p.m.

PRESENT: Councillors, Alan Hall, Stella Jeffrey (Chair), Roy Kennedy and John Paschoud.

APOLOGIES: Councillor Janet Daby.

1. **Declarations of Interest**

There were no declarations of interest.

2. **Minutes**

RESOLVED that the Minutes of the Meeting held on 22 January 2015 be confirmed and signed as a correct record.

3. **UK Parliamentary General Election 7 May 2015**

The Committee considered a report on the current status of preparations for the UK Parliamentary General Election, to be held on 7 May 2015.

The Head of Law distributed tabled the 'Assessment of progress with the transition to Individual Electoral Registration' report that the Electoral Registration published in June 2015, and highlighted a number of key points from the report.

The Committee noted that Electoral rolls were up 1% nationally, but 1.9 million electors were still unconfirmed under IER. Variations across the country ranged from 0% to 23% of the electoral roll, and in Lewisham the figure was approximately 16,280 which represented 8.2%. The transition to IER would not be brought to an end until December 2016 as the Electoral Commission wanted to see the outcome of the full Household Enquiry Form (HEF) canvass before making their decision about this, and there would be insufficient time to do that if the transition was closed in December 2015.

77% of all applications for IER had been made online, and online application was particularly popular with young people and overseas voters.

There was concern regarding the fall in the number of young attainers on the electoral roll nationally. Since February/March 2014 the number had fallen by around 47%, attributed by the Electoral Commission to the lack of a comprehensive canvass in 2014. The Electoral Commission believed the full HEF canvass in 2015 may redress this somewhat. Household notification letters that were sent by Lewisham Electoral Registration officers in February 2015 did not particularly attract attainers, possible due to the emphasis on the upcoming

general election, for which attainers would for the most part have been too young to vote. The Electoral Commission was encouraging Electoral Registration Officers to update their engagement strategy to now focus on young attainers.

The Head of Law highlighted that turnout had been higher than the 2010 General Election, the postal vote returns were at over 80%, and that there had been a larger than anticipated number of proxy votes requested.

The Chair queried how well the count arrangements were during the election period, and the Head of Law responded that the Laurence House ground floor venue for the count had been adequate but not entirely satisfactory, given the previous difficulties in finding a venue.

Councillor John Paschoud commented that some difficulties had been experienced on the evening of the count, for example two sections of the room were separated by the reception area, which caused some minor delays. Furthermore, there was uncertainty as to whether councillors were admitted to the count. Guidance had previously been that only one nominated counting agent per candidate could attend, but throughout the course of the evening a number of councillors were admitted. The Head of Law noted Councillor John Paschoud's comments and said that feedback on the arrangements was always welcome.

The Chair noted the financial implications in the report, and the Head of Law explained that there were additional costs associated with the General Election which were not recoverable, for example the dedicated call centre set up by the Council to handle registration queries was not considered an election expense. The rest of the costs would be reimbursed by HM Treasury.

Councillor Kennedy proposed an additional recommendation, that in the meeting after the next Elections Committee, a report be provided to look at the arrangements for the 2018 General Election and how matters arising from the 2014 Local and 2015 General Elections could be addressed and planned more effectively. The Chair and Committee were in agreement with the additional recommendation.

The Chair extended her thanks to the officers for the work undertaken, and their professionalism during the busy election period.

RESOLVED that

- a) the report be noted; and
- b) a report on the preliminary arrangements of the 2018 UK Parliamentary General Election be provided to the Elections Committee at the meeting after next.

4. **Update on IER**

The Committee considered a report which provided an update on the implementation of Individual Electoral Registration (IER) in Lewisham.

Given that the Electoral Registration Working Party was scheduled to follow directly from the meeting of the Elections Committee, Members were minded to reserve an in depth discussion on the update on IER to the Working Party meeting.

RESOLVED that the report be noted.

The Meeting closed at 8.05 p.m.

Agenda Item 4

ELECTIONS COMMITTEE			
Report Title	GLA Elections 5 May 2016 - review		
Key Decision	n/a		Item No.
Ward	n/a		
Contributors	Head of Law		
Class	Part 1	Date: 8 th September 2016	

1. Purpose

This report reviews the arrangements for the GLA Elections which took place on 5 May 2016. The Elections were for

- London Mayor
- London Assembly Member
- London Assembly Member for Greenwich and Lewisham Constituency

2. Recommendation

That the Committee note this report.

3. Introduction

3.1 The scale and complexity of the Mayor of London and London Assembly elections represented a major challenge:-

- the electorate is 5.8m and there are four votes across three ballot papers using three different electoral systems;
- there were approximately 830,000 postal voters
- they are delivered by working across the administrative boundaries of London and the hierarchy of a Greater London Returning Officer (GLRO), Constituency Returning Officers (CROs) and then Borough Returning Officers (BROs);
- there is a legal requirement to send a manifesto booklet to every registered voter; and
- the staffing and wider resource needs are considerable . Some 12000 staff were involved in 4000 polling stations across London, at three count centres and at City Hall.

- 3.2 A new approach to the management of the GLA election was adopted at City Hall. In the past, the London elections have been delivered by a discrete separate unit using staff on fixed term contracts who left the GLA after the election. The 2016 GLA elections were delivered by a programme team drawn from across the GLA . The new arrangements were designed to draw on the skills and knowledge within the GLA and to enhance resilience but meant that some of the team had limited experience of elections. As a result, the normal partnership working between the GLA team and the boroughs was heightened to ensure a sharing of expertise and knowledge. On the whole this new arrangement worked very satisfactorily.
- 3.3 There are 14 constituencies in London, each made up of two or three boroughs, with the borough with the largest electorate within the constituency taking the lead. Lewisham is the lead borough for the Greenwich and Lewisham constituency and Barry Quirk is the Constituency Returning Officer (CRO). There continues to be some dissatisfaction with the legal position of the Borough Returning Officer (BRO) in the non-lead constituency. The current legislation clearly states that the CRO has responsibility for running the election in the combined constituency. However he is reliant on the support and engagement of the following borough, particularly in relation to the pre-election preparations and the administration of polling stations. However the BRO has no status in law, and arrangements between the CRO and BRO are largely informal. This is generally viewed as unsatisfactory and has led to problems between some boroughs in the past, though not in Lewisham and Greenwich. Notwithstanding this issue the CRO in Lewisham continues to enjoy the full support of Greenwich BRO and Electoral Services Manager.

4 Review of the election London wide

- 4.1 There have so far been only 2 reports which deal with aspects of the GLA election 2016. Both are reports of the GLA Assembly Elections Review Panel. The first is dated June 2016 and the second August 2016. Copies are available here

<https://www.london.gov.uk/moderngov/ieListDocuments.aspx?...>

They dealt with the administration of the London wide election generally and concluded that the election was generally well run. However the reports note that several issues arose which gave cause for concern.

- 4.2 The major concern at a London level was the provision of incomplete electoral registers to polling stations in the London Borough of Barnet as a result of human error. This meant that some voters were unable to

vote and there were no system checks in place to avoid the possibility of the human error which arose. A full report of the occurrences in Barnet is appended to the London Assembly reports. The CRO and the Elections team have taken to heart the recommendations from the Barnet Inquiry and though checks were already in place in Lewisham and there is no experience of a similar occurrence here, those system checks were enhanced for the EU Referendum and future elections.

- 4.3 The second issue which gave rise to concern was the delay in the publication of the mayoral result. The London Assembly reports state that this was due to an IT error in the allocation of votes between first and second preferences but not across candidates, so that detailed checks had to be done after declaration of constituency results the last of which was at approximately 6 p.m. on 6th May. However as a consequence the results could not be declared until 00.18 on 7th May.
- 4.4 The Electoral Commission is to publish its own review of the GLA elections though this is unlikely to be available until the end of September 2016.

5. The GLA election in Lewisham

- 5.1 In Lewisham, at the time of the GLA election in 2016 there were approximately 190,000 registered local government electors of whom approximately 24,000 were postal voters. 113 polling stations were used and we employed approximately 450 polling staff.
- 5.2 Despite the sad, unexpected death of the Electoral Services Manager a matter of weeks before them, the GLA elections in Greenwich and Lewisham were conducted without any major issues, and the CRO would like to commend the excellent efforts of the small central Elections Team in very difficult circumstances. Because of the proximity to the GLA elections and the EU referendum, it would have proved impossible to recruit quickly to the vacant position and so interim support was commissioned from Steve Gough who acted on a temporary basis to manage the team and the GLA project. The post has now been advertised with a closing date of 18th August 2016.

6. Polling Stations and Staffing

- 6.1 Because of the complexity of the three voting systems, with three ballot papers and three ballot paper accounts, staffing at polling stations exceeded both the Electoral Commissions and GLRO guidance. We employed 3 Poll Clerks and 1 Presiding Officer at each station with one more at split and double stations. In all, we used 113 Presiding Officers (POs), 344 Poll Clerks (PCs) and 18 Visiting Officers (VOs).

6.2 Of the 113 polling places used in Lewisham at this election only 5 were portakabins. We split 4 polling stations to conform to Electoral Commission footfall guidance which requires that no more than a maximum of 2500 voters who may vote in person at a polling station.

6.3 The split polling stations were:-

- Ashmead Primary School (DBR6)
- Riverside Youth Club (DEV3)
- Brindishe Green Primary School (DLC1)
- All Saints Community Centre (DNE5)

Where the polling stations were split we employed an additional poll clerk to direct people to the correct desk.

6.4 We had robust contingency arrangements in place to cover any failure to gain access to polling stations which involved having locksmiths on call and a fully equipped Council bus as a mobile polling station. Neither had to be used on the day. Our POs and VOs are trained to commence issuing ballot papers at 07.00 hrs, if necessary using the boot of their car until such time as help arrives.

6.5 Training was given by the Head of Law to all POs and VOs as required by Electoral Commission direction. However LBL have a policy of compulsory attendance at training sessions before confirming appointments - no training no job. The GLRO sent observers to one of our training sessions and commended the quality of the training given by the Head of Law. For this election, we put together an instructional video in addition to the usual material from the Electoral Commission and it was very well received by participants and the GLRO observer.

6.6 We used 18 Visiting Officers, one per ward. Their role was to inspect the set-up of polling stations and provide feedback on their suitability, carry emergency equipment, provide advice to staff and collect postal votes handed in at polling stations during the day and be available to provide assistance in emergencies. The EC and GLRO directions were for VOs to visit polling stations twice, once between 17.00 and 19.00hrs to assess the risk of queues developing. Our VOs were instructed to visit three times to minimise the impact of having to deal with postal votes. Each VO was stationed in their ward from 9 p.m. so that they would be on hand quickly to deal with any problems at close of poll. In the event, however, there were no queues.

7. Poll cards and postal votes

7.1 Lewisham complied with the directions of the EC with regard to wordings and mailing dates on poll cards and instructions to postal voters. The postal vote issue was again outsourced to our printers, Financial Data

Management Limited (FDML). The Head of Law and a small team visited FDML's premises prior to mailing to conduct quality assurance tests by random sample checks and process inspection.

- 7.2 In accordance with EC and GLRO directions 100% of personal identifiers on returned postal votes were checked. Whilst the statutory requirement is to check 20% LBL has always conducted 100% check. No integrity issues were detected during this process and there were no allegations of postal vote fraud.
- 7.3 In 2016, LBL issued 72,564 postal ballot papers across all three elections (24,188 ballot paper packs). of which 17,079 packs were returned. From these returns, approximately 16,670 were included in each count with 410 being rejected for the following reasons:
- Postal vote statements had either been completed incorrectly –that is either no date of birth or signature or both had not been provided;
 - Dates of birth or signatures did not match with the underlying application form.

The postal vote rejection rate was approximately 2.4% .

This represents an increase in the number of postal votes over 2012 when 22,746 postal ballot paper packs were issued, of which 16,669 were returned. Of these approximately 3% were rejected for the same reasons set out above. This rejection rate in 2012 was 25% higher than in 2016.

- 7.4 The persons undertaking the verification of postal votes are provided with a copy of the Electoral Commission's "Forensic Science Guidance on Signature Checking"

8. **After the close of poll**

- 8.1 Ballot boxes were returned to Laurence House where the ballot paper accounts and unused ballot papers were checked. They were then put on lorries and transferred to the Excel count venue arriving there at 02.30hrs on Friday 6 May. The ballot boxes could not be released until the final postal votes returned to polling stations had been checked. The ballot boxes were transferred to the lorries under police supervision but unlike in previous years, the police were unable to provide an escort to the count venue. The ballot papers were accompanied en route to Excel by the CRO and Head of Law who travelled in the 2 lorries with the ballot papers and oversaw their arrival and deposit at the count venue. Both waited for delivery of the Greenwich ballot papers, and only when all ballot papers were safely delivered did they leave the count venue. Excel provided security from that point overnight. However a member of

the CRO's team stayed at all times with the ballot boxes on the floor of Excel overnight until the count team started to arrive at 07.00hrs on 6 May.

9. The Count

- 9.1 The count was conducted electronically by Intellect, a company commissioned by the GLA. Intellect is a joint venture between DRS, a company which has conducted electronic counts in the past, and Electoral Reform Services. The count for the Greenwich and Lewisham constituency was based at Excel along with 4 other constituencies (Bexley and Bromley; City and East; Lambeth and Southwark; Havering and Redbridge). Lewisham and Greenwich supplied the staff to operate all of the machinery – PCs and scanners – whilst Intellect provided the hardware, software and technical support. Detailed training was provided by Intellect and the GLA team a few weeks before election day. All of the Lewisham and Greenwich count team travelled to Hounslow for this training. Unfortunately the training day suffered a number of technical glitches, with the equipment not being operational for several hours. However, eventually, staff were able to participate in a mock count albeit for a much shorter time than planned.
- 9.2. We experienced no significant issues at the count which affected the outcome. On the whole it was conducted relatively smoothly. However there were two matters which did cause delay locally.
- 9.3 The first of these was the performance of the scanning machines. By lunchtime over 80% of the Greenwich and Lewisham votes had been processed. However as the day wore on, the scanners became less efficient and would not read the ballot papers electronically. Several were out of commission at any one time with insufficient spares provided. The result was that to scan one batch of votes took 5 or 6 times as long to scan as should be expected. Performance of the machinery became so poor as the day wore on that the CRO considered abandoning scanning altogether and resorting to manual entry on the PCs across the board. It also seemed that the scanning machines were hampered by the glue from the one piece mailers used on the postal packs by a number of boroughs. However at other count centres a newer model of the scanning machines was in use which seemed to suffer less from this problem. Eventually however, all votes were scanned and adjudicated using the PCs without escalation to exclusively manual entry.

The second issue was a technical IT glitch which arose when all votes had been entered on the system. Although all of the votes had been processed, by later afternoon there remained a handful, - approximately 15 – which required some level of manual input. However due to IT

technical glitches, the system would not allow manual processing. Until these final few had been processed the local results could not be declared. We escalated this to Intellect, who further escalated it and eventually after a wait of over one hour, the technical team at City Hall rectified the problem and the result could finally be declared locally.

10. Turnout and result

The franchise for the election was all eligible Local Government Electors. This includes EU citizens. The turn out overall in the Greenwich and Lewisham Constituency was 45% compared to 37% in 2012. The average turnout across London was 45.3% compared to 38.85% in 2012. The turnout in Lewisham was 47.39% and in Greenwich 43.27%. In 2012 it was 37.27% in Lewisham and 37.21% in Greenwich. Ward breakdowns are given in Appendix A.

11. Future Implications

The conduct of these elections went smoothly in Lewisham and Greenwich. In August the CRO will be holding a mop up session to establish what practical lessons can be learnt from the conduct of this poll. We also await the Electoral Commission report to be published in September this year which may also contain pointers for improvement in the administration of future polls

12. Financial implications

There are no specific financial implications known at this point. The GLA fund the cost of these elections. A joint claim will be submitted on behalf of the constituency for the cost of the election across both Greenwich and Lewisham. Those accounts are yet to be finalised. In the past the claim has been met in full by the GLA and we anticipate that this is likely to be the case this time. Lewisham's share will be higher than Greenwich's as the lead borough was responsible for count expenditure.

13. Legal implications

There are no legal implications arising.

14. Crime and disorder implications

There are no crime and disorder implications arising.

15. Equalities implications

- 15.1 In the conduct of elections, Lewisham pays particular attention to its duties under the Equality Act 2010. Equality measures include outreach to voluntary sector groups supporting people with protected

characteristics, the use of tactile devices in polling stations for those with visual impairment, pictorial Makaton guides to voting in the polling stations, systematic review of polling places to ensure disabled access is available and several other measures.

15.2 The Equality Act 2010 (the Act) introduced the new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

15.3 In summary, the Council must, in the exercise of its functions, have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- advance equality of opportunity between people who share a protected characteristic and those who do not.
- foster good relations between people who share a protected characteristic and those who do not.

15.4 The duty is to pay regard that is due in all the circumstances, and the weight to be attached to it is a matter for the Council, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.

15.5 The Equality and Human Rights Commission issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled "Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice". The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it. The statutory code and the technical guidance can be found at: <http://www.equalityhumanrights.com/legal-and-policy/equality-act/equality-act-codes-of-practice-and-technical-guidance/>

15.6 The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:

1. The essential guide to the public sector equality duty
2. Meeting the equality duty in policy and decision-making
3. Engagement and the equality duty

4. Equality objectives and the equality duty
 5. Equality information and the equality duty
- 5.8 The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at: <http://www.equalityhumanrights.com/advice-and-guidance/public-sector-equality-duty/guidance-on-the-equality-duty/>

16. **Environmental implications**

There are no environmental implications arising.

17. **Background documents and originator**

Kath Nicholson 020 8314 7648

Appendix A - Lewisham ward breakdown

Borough	Ward	Mayor			Assembly London-wide			Constituency Assembly Member			Turnout	Ward Level Electorate	% Turnout
		Total Good	Total Spoils	Total Mayor Ballots	Total Good	Total Spoils	Total Assembly Ballots	Total Good	Total Spoils	Total Constituency Ballots			
Lewisham	Bellingham	2781	67	2848	2786	62	2848	2786	62	2848	2848	8,552	33.30%
Lewisham	Blackheath	3895	46	3941	3906	35	3941	3903	38	3941	3941	7,999	49.27%
Lewisham	Brockley	4816	53	4869	4829	40	4869	4824	45	4869	4869	9,959	48.89%
Lewisham	Catford South	3867	77	3944	3901	43	3944	3891	54	3945	3945	8,949	44.08%
Lewisham	Crofton Park	4558	63	4621	4574	47	4621	4564	57	4621	4621	8,977	51.48%
Lewisham	Downham	2607	55	2662	2611	50	2661	2624	37	2661	2662	8,437	31.55%
Lewisham	Evelyn	3544	53	3597	3560	37	3597	3546	51	3597	3597	9,314	38.62%
Lewisham	Forest Hill	4210	52	4262	4223	36	4259	4222	39	4261	4262	8,608	49.51%
Lewisham	Grove Park	3210	63	3273	3221	52	3273	3235	37	3272	3273	8,607	38.03%
Lewisham	Ladywell	4349	79	4428	4373	56	4429	4386	42	4428	4429	8,271	53.55%
Lewisham	Lee Green	4335	58	4393	4359	33	4392	4349	43	4392	4393	8,499	51.69%
Lewisham	Lewisham Central	4303	82	4385	4317	67	4384	4318	66	4384	4385	10,418	42.09%
Lewisham	New Cross	3728	64	3792	3744	47	3791	3745	46	3791	3792	9,092	41.71%
Lewisham	Perry Vale	4442	54	4496	4459	38	4497	4455	41	4496	4497	9,309	48.31%
Lewisham	Postal Ward	16241	127	16368	16255	98	16353	16278	76	16354	16368	23,562	69.47%
Lewisham	Rushey Green	3194	64	3258	3212	46	3258	3195	62	3257	3258	8,019	40.63%
Lewisham	Sydenham	4176	78	4254	4203	51	4254	4201	52	4253	4254	9,213	46.17%
Lewisham	Telegraph Hill	4535	60	4595	4552	43	4595	4552	43	4595	4595	9,403	48.87%
Lewisham	Whitefoot	2841	67	2908	2827	81	2908	2827	81	2908	2908	8,188	35.52%
	TOTAL	85632	1262	86894	85912	962	86874	85901	972	86873	86897	183376	47.39%

Appendix B – Greenwich ward breakdown

Borough	Ward	Mayor			Assembly London-wide			Constituency Assembly Member			Turnout	Ward Level Electorate	% Turnout
		Total Good	Total Spoils	Total Mayor Ballots	Total Good	Total Spoils	Total Assembly Ballots	Total Good	Total Spoils	Total Constituency Ballots			
Greenwich	Abbey Wood	2881	101	2982	2951	32	2983	2943	40	2983	2983	9,202	32.42%
Greenwich	Blackheath Westcombe	4233	62	4295	4258	31	4289	4268	26	4294	4295	8,196	52.40%
Greenwich	Charlton	3694	80	3774	3744	30	3774	3747	27	3774	3774	8,918	42.32%
Greenwich	Coldharbour and New Eltham	3161	75	3236	3214	22	3236	3215	21	3236	3236	8,273	39.12%
Greenwich	Eltham North	4264	103	4367	4340	27	4367	4349	18	4367	4367	8,528	51.21%
Greenwich	Eltham South	3162	43	3205	3175	30	3205	3181	23	3204	3205	7,616	42.08%
Greenwich	Eltham West	2445	69	2514	2488	25	2513	2502	14	2516	2516	7,445	33.79%
Greenwich	Glyndon	3484	96	3580	3535	45	3580	3538	42	3580	3580	9,598	37.30%
Greenwich	Greenwich Postal Votes	17486	134	17620	17477	78	17555	17485	71	17556	17620	25,825	68.23%
Greenwich	Greenwich West	5076	77	5153	5113	40	5153	5115	37	5152	5153	11,597	44.43%
Greenwich	Kidbrooke with Hornfair	2895	82	2977	2944	32	2976	2950	27	2977	2977	8,558	34.79%
Greenwich	Middle Park and Sutcliffe	3150	56	3206	3179	28	3207	3188	18	3206	3207	8,180	39.21%
Greenwich	Peninsula	4345	88	4433	4394	39	4433	4402	29	4431	4433	10,688	41.48%
Greenwich	Plumstead	3231	94	3325	3290	34	3324	3291	34	3325	3325	9,145	36.36%
Greenwich	Shooters Hill	3624	101	3725	3681	42	3723	3694	32	3726	3726	8,423	44.24%
Greenwich	Thamesmead Moorings	2780	109	2889	2846	42	2888	2843	45	2888	2889	10,049	28.75%
Greenwich	Woolwich Common	2994	104	3098	3071	29	3100	3073	27	3100	3100	9,218	33.63%
Greenwich	Woolwich Riverside	3597	112	3709	3669	40	3709	3674	35	3709	3709	11,029	33.63%
	TOTAL	76502	1586	78088	77369	646	78015	77458	566	78024	78095	180488	43.27%

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Agenda Item 5

ELECTIONS COMMITTEE			
Report Title	Parliamentary Boundary Review		
Key Decision	n/a		Item No.
Ward	n/a		
Contributors	Head of Law		
Class	Part 1	Date: 8 th September 2016	

1. Summary

This report sets out the detail of the review of parliamentary constituencies 2018 and informs the Committee of a submission made to the Boundary Commission for England.

2. Purpose

To inform members of the procedures for the review of parliamentary constituencies 2018.

3. Recommendation

That the Committee note this report

4 Background

- 4.1 The Parliamentary Voting Systems and Constituencies Act 2011 (the Act) made provision for a reduction in the number of UK parliamentary constituencies from 650 to 600. To implement this change in England, the Boundary Commission for England (the BCE) must complete a review of parliamentary constituencies by September 2018. The BCE began such a review in 2011 but it was discontinued. The BCE now intends to begin afresh in September 2016 to hit the statutory timetable. It published guidance on the process in July this year setting out how it will conduct the review. A copy is available on the BCE website.
- 4.2 The Act introduced a UK quota for the number of electors in any constituency. By the application of a formula, that quota is 74769. Schedule 2 of the Act states that every constituency must “at the review date” have an electorate of at least 95% and not more than 105% of that quota. This means that every constituency must have between 71031

and 78507 electors. The statute provides that the review date is 1/12/15.

- 4.3 The BCE will conduct its review on a regional basis, according to the EU regions. The number of constituencies in England will be 501. The Isle of Wight will have 2 of these leaving 499 for the rest of England. Currently in London (including the City) there are 73 MPs. After the review there will be 68.
- 4.4 The Act is clear that the electoral quota will take precedence but it allows the BCE to take into account a number of other factors in developing proposals. These are:-
- (a) Special geographical considerations – size, shape and accessibility of the constituency. This means physical factors such as mountains, hills, rivers, estuaries etc. It does not include human or social factors in this category.
 - (b) Local government boundaries – both external and internal ward boundaries. The Guidance is clear that wards are to be the “default building blocks” of new constituencies. However, the BCE acknowledges that ward boundaries may be crossed where there are compelling, exceptional circumstances which must be supported by strong evidence. The BCE will use groupings of two or more local authority areas in drawing up initial proposals. These sub regions will be explained when their initial proposals are published. The BCE intends not to cross the boundary of the sub-region where possible.
 - (c) Existing constituencies –The proposals will not be developed from a “blank piece of paper” though the BCE state that it may be necessary to depart from existing constituencies to bring new ones within the statutory range and to reduce the number of constituencies.
 - (d) Any local ties that would be broken by a change.
- 4.5 There are a number of factors which the BCE may not take into account. These are:-
- (a) The effect on future election results
 - (b) New local government boundaries put in place after 7th May 2015
 - (c) Changes (up or down) in electorate numbers since 1st December 2015
- 4.6 Though the review date is explicit in the Act, the BCE states at paragraph 40 of its Guidance as follows:-

“However, the BCE does not take the view that it is obliged to shut its eyes entirely to growth (or decline) that has occurred since the review

date, which it may be aware of from the annual updates of electorate figures it receives, or that it is satisfied is likely to occur. Such a factor may be taken into account in choosing between two or more competing options for the same area that satisfy the statutory rules”

- 4.7 The procedure for the review entails a number of stages:-
- (a) In the week commencing 12/9/16 the BCE will publish initial proposals on its website and put them on deposit with Councils and in other places where the public can view them.
 - (b) There is an initial consultation period of 12 weeks for representations to be made. The BCE encourages written representations and states that any objections will be considered to have more weight if they are accompanied by a viable alternative proposal. The last date for written representations will be published with the initial proposals.
 - (c) During the 12 week initial consultation a number of public hearings will be held. They are not public inquiries which have been abolished. Nor are they debates or public meetings. Rather they are short hearings lasting no more than 2 days each at which, the Guidance states, the BCE will explain the initial proposals and people may give their views. There will be 5 hearings in the London area between mid October and mid November, (dates to be confirmed) and those wishing to speak are advised to apply to do so in advance as timings will be strictly limited. The hearings will not focus to any degree on counter proposals. At the first hearing in each of the areas, the five political parties with parliamentary seats will be invited to make representations for the whole region.
 - (d) As soon as possible after the 12 week initial consultation period, the BCE will publish all representations made including the record of the public hearings. There then follows a period of 4 weeks during which people may submit written comments on the representations received in the initial consultation period. There are no hearings at this stage.
 - (e) The BCE staff and Assistant Commissioner then produce a joint report for the Commissioners who decide whether any and if so what revisions ought to be made to the initial proposals. The Commissioners then publish a report saying whether revisions have been made or not.
 - (f) If revisions have been made, there follows a further period of 8 weeks during which representations may be made on the revised proposals. There are no hearings and no repetition of the 4 week period.

- (g) The final report and any representations made in that 8 week period are published and a formal written report for the whole of England is submitted to the Government. It describes the review, sets out the recommendations and includes maps of the new constituencies.
- (h) The Government must lay the report before Parliament. It has no discretion to change it. It lays a draft Order giving effect to the recommendations. The draft Order must be approved (or rejected) by both Houses of Parliament. Once the Order has effect, it cannot be challenged and the new constituencies apply at the next General Election – scheduled for 2020.

5. Implications for Lewisham

- 5.1 The implications for representation of local residents in Lewisham in Parliament could well be severely hampered by a rigid approach to the use of electorate figures as at 1/12/15. The electorate figures for each of the Lewisham parliamentary constituencies are set out in Table 1 below

	1/12/15	1/1/16	1/2/16	1/3/16	1/4/16	1/5/16	1/6/16	1/7/16
Deptford	67,168	67,761	66,420	67,007	67,367	68,740	70,762	74,352
Lew East	62,368	62,743	62,191	62,665	62,904	63,666	64,487	66,673
Lew W & Penge*	37,692	37,967	37,585	37,874	38,046	38,603	39,175	40,492

*excludes 3 wards in Bromley which had 4.17% increase over same period from 29,992 to 31245 bringing totals in Lewisham West and Penge in December 2015 to 67654 and in July 2016 to 71737

- 5.2 Table 1 above demonstrates an increase of 8.54% between 1stDecember 2015 and 1st July 2016. This might be explained largely by the influx of registrations in response to the campaigns to register in anticipation of the EU referendum and the GLA elections in June and May respectively this year. A comparison of Office of National Statistics Data on 1st December 2015 electoral register and electorate figures for 23rd June 2016 EU Referendum show that the greatest increase in London in the numbers on the electoral register was in Lewisham.
- 5.3 There have also been significant developments across the borough, with more proposed. The latest planning projections for 2015/16 show that an estimated 2,295 properties have come on to the register in the borough since 1st March 2015. Ref:
<http://www.lewisham.gov.uk/myservices/planning/policy/LDF/Documents/Annual%20monitoring%20report%202014%e2%80%9315.pdf>

- 5.4 It is also acknowledged that the move to Individual Electoral Registration with an early cut-off date of 1st December 2015 led to much voter confusion and a fall in response rates at the December publication of the electoral register. The EC recognises that there are particularly high rates of underrepresentation among social tenants, black and ethnic minority communities and young people. On all of these social categories Lewisham scores highly as set out in more detail in Appendix 1.
- 5.5 For these reasons, it would appear that the use of the December 2015 register as baseline data for the allocation of parliamentary seats would grossly underestimate the electorate in Lewisham and mean that they are significantly underrepresented at a national level. Officers therefore made a submission to the BCE urging them to take account of these factors when deciding between different options for the Lewisham area, as is envisaged in paragraph 40 of the BCE guidance, a copy of which appears at Appendix 1. Given that the BCE will be making its proposals in September 2016, it was not possible to wait until the scheduled meeting of this committee before making the submission if it was to have any impact on the BCE's assessment of alternatives in the formulation of proposals.

6. **Legal implications**

These are set out in the body of the report.

7. **Equalities implications**

- 7.1 The Equality Act 2010 (the Act) introduced the new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 7.2 In summary, the Council must, in the exercise of its functions, have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - advance equality of opportunity between people who share a protected characteristic and those who do not.
 - foster good relations between people who share a protected characteristic and those who do not.
- 7.3 The duty continues to be a “have regard duty”, and the weight to be attached to it is a matter for the Council, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to

eliminate unlawful discrimination, advance equality of opportunity or foster good relations.

7.4 The Equality and Human Rights Commission issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled “Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice”. The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it. The statutory code and the technical guidance can be found at: <http://www.equalityhumanrights.com/legal-and-policy/equality-act/equality-act-codes-of-practice-and-technical-guidance/>

7.5 The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:

1. The essential guide to the public sector equality duty
2. Meeting the equality duty in policy and decision-making
3. Engagement and the equality duty
4. Equality objectives and the equality duty
5. Equality information and the equality duty

7.6 The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at: <http://www.equalityhumanrights.com/advice-and-guidance/public-sector-equality-duty/guidance-on-the-equality-duty/>

8. **Financial implications**

There are no specific financial implications.

9. **Crime and disorder implications**

There are no crime and disorder implications arising.

10. **Environmental implications**

There are no environmental implications arising.

11. **Background documents and originator**

Kath Nicholson 020 8314 7648



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26th August 2016

Howard Simmons
Assistant Commissioner for London
Boundary Commission for England
35 Great Smith Street
London
SW1P 3BQ

Dear Mr Simmons,

Lewisham Deptford, Lewisham East, Lewisham West

I am aware that the Commission will shortly be publishing proposals for new Parliamentary boundaries. My purpose in writing is to ask that you bear in mind this submission in drawing up your proposals. Lewisham Council has serious concerns that if the 2018 Parliamentary Boundary Review is conducted solely on the basis of the electoral roll in Lewisham at 1 December 2015, the people in its 3 parliamentary constituencies, Lewisham Deptford, Lewisham East and Lewisham West, will be significantly under represented for years to come.

As a result of this possible outcome, I strongly urge the Boundary Commission for England (BCE) not to rely solely on the December 2015 electoral register alone, but instead to consider the July 2016 electoral roll as a fairer and more accurate reflection of the electorate in the three Lewisham constituencies.

We appreciate that the Parliamentary Voting Systems and Constituencies Act 2011 provides that the figures to be used as a basis for the review are those in the version of the electoral

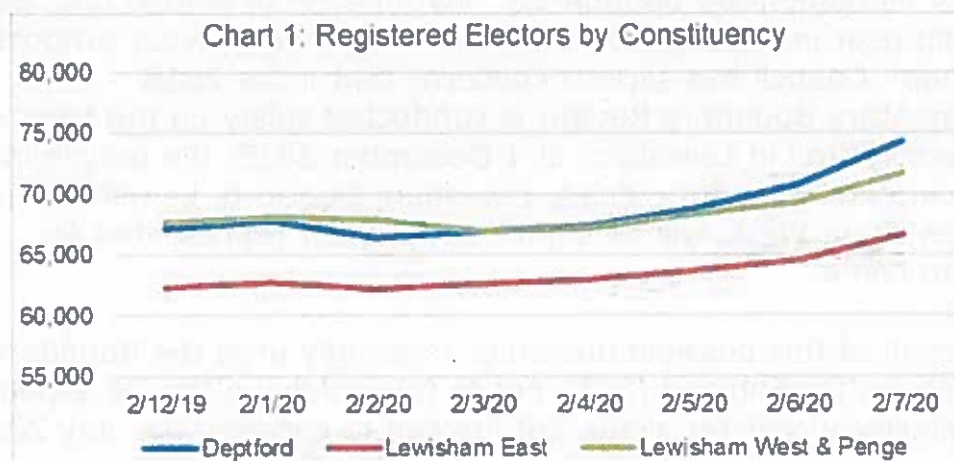
registers on the 'review date' – namely 1 December 2015. Whilst this number is given precedence in the Act, we ask that the BCE adopt the approach to the electoral numbers set out in the statutory guidance. It is clear from that guidance that it is not intended that the electoral number as at 1 December 2015 should be a straightjacket beyond which the BCE may not look. Paragraph 40 of the guidance states:-

"However the BCE does not take the view that it is obliged to shut its eyes entirely to growth (or decline) that has occurred since the review date, which it may be aware of from the annual updates of electorate figures it receives, or that is satisfied is likely to occur. Such a factor may be taken into account in choosing between two or more competing options for the same area that satisfy the statutory rules"

The reasons why we ask that the BCE adopt this approach in considering the options for the Lewisham constituencies are set out below.

The impact of the EU referendum on registration in Lewisham

Chart 1 below shows the increasing electorate in Lewisham's constituencies between 1 December 2015 and 1 July 2016. This represents a growth of 8.54% between 1 December 2015 and 1 July 2016 with an increase of over 16,000 in successful registrations in this period.

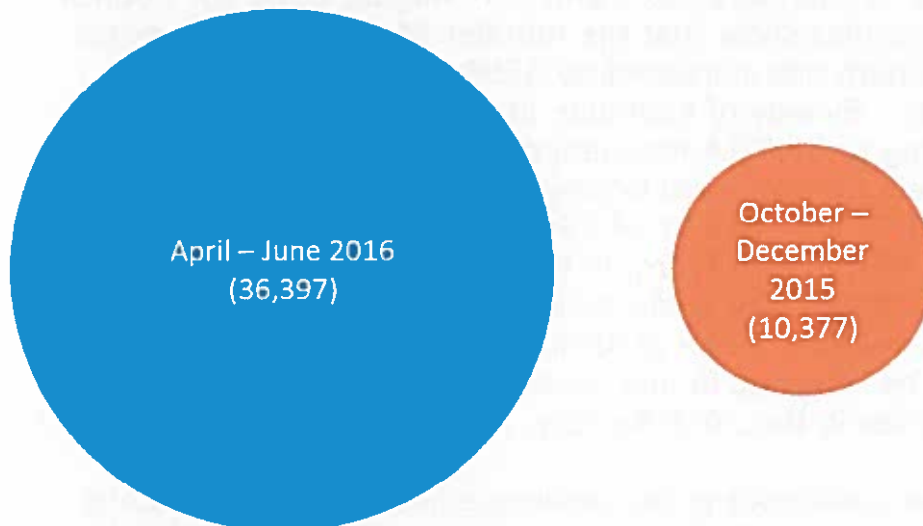


No doubt this was precipitated generally by the extent of public interest in the EU referendum as the date approached and by successful campaigns to promote electoral registration. This increase in demand for registration was evidenced by the collapse of the Government's own website

which could not cope with the demand for new registrations, resulting in the extension of the deadline for registration by 2 days.

In Lewisham however the impact was exceptional. Perhaps due to the strength of local campaigns to promote registration, the increase in the numbers on the electoral roll in Lewisham between 1 December 2015 and 1 July 2016 was greater than any other Authority in London. Figures produced by the Electoral Commission attached to this letter confirm this.

As Chart 2 below demonstrates, the increase in applications for individual electoral registration in Lewisham between 1 April and 1 June 2016 (36,397) is more than 3 times the increase for the entire canvass period 1 October 2015 to 1 December 2015.



We ask the BCE to acknowledge this exceptional rise in registration in Lewisham and adopt an approach which reflects it in its calculation of the electoral quota per constituency.

Population rise

It is beyond doubt that the population of London as a whole is growing. However the growth in Lewisham is particularly marked. Both the Office for National Statistics (ONS Sub-National Population Projections 2016) and the Greater London Authority population projections predict rises in the population of Lewisham of between 40,000 to 60,000 over the next 15 years. Before the next parliamentary boundary review, the population is expected to have risen to between

328,000 (low variant) and 380,000 (high variant). The principal projection anticipates a rise to 355,000. As at 1 December 2015, the population stood at 298,000. Whichever prediction is closer to the real number, it is so significant that we submit that the BCE ought to take this into account when deciding between the options for the Lewisham constituencies.

This population rise is underlined by the scale of development and proposed development in the 3 constituencies. There is a widespread regeneration programme under way in Lewisham and Catford town centres, with more planned for Deptford in the north. Lewisham regularly exceeds its target for new home completions as set out in the London Plan. Planned development exceeded target in nine of the last ten years.

Between 3rd January 2015 and 22nd August 2016 our Council Tax schedules show that the number of domestic properties in Lewisham has increased by 3550, a trend we expect to continue. By way of example, in Lewisham Deptford, according to the GLA Population Projections 2016, the Lewisham Central ward is projected to increase population from 19,870 in 2016 to 24,426 in 2026, a rise of 23% in ten years, with Evelyn Ward, in the same constituency, increasing over the same period from 18,862 in 2016 to 27,277 in 2026, a rise of 45%. We suggest that these rises should be reflected in any consideration of parliamentary boundaries in the 2018 Review.

There is confidence in the resilience and flexibility of future housing land due to the range and number of sites already planned for future housing, and a high probability that site developments due will be implemented when forecast. In the next 5 years alone 8,682 new dwellings are due to be built on 45 sites. Furthermore there is sufficiently good housing land supply over the next 10 to 15 years to support a total of 17,178 net dwellings to be developed across 78 sites.

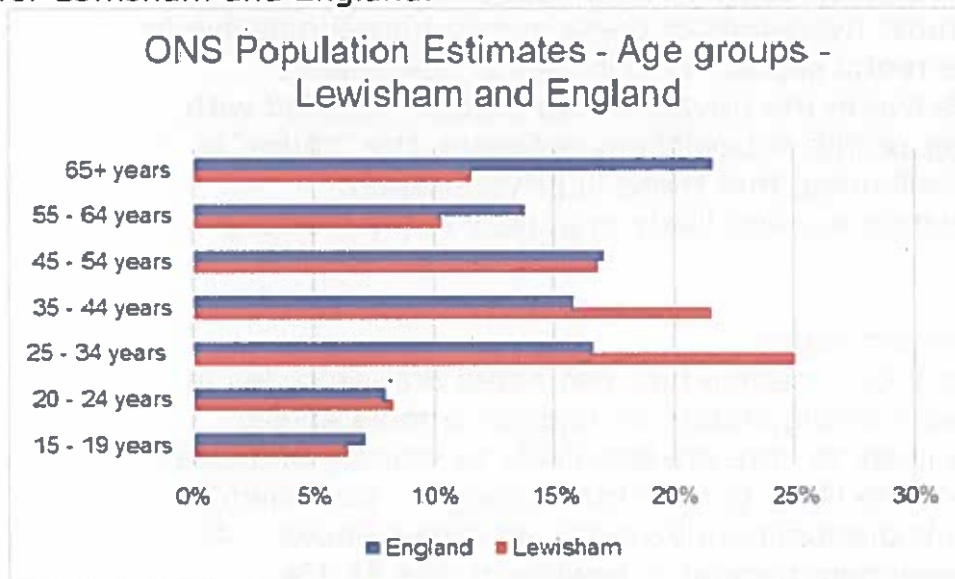
The rapidly growing population and relentless drive to build new homes to meet the London Plan for housing development over the next 10 to 15 years underlines the importance of getting the base count right now. There is otherwise an inherent danger that the outcome of the Review will be undermined by changing reality.

Register completeness

The Electoral Commission's research shows that London Boroughs generally have lower levels of electoral register completeness than the rest of the country, a finding they link to the demographic characteristics of the city ¹. We submit that many of these demographic features impact on registration rates in Lewisham particularly. Each is addressed below with particular reference to Lewisham.

Students and Age

London has substantial problems with its 500,000 Higher Education students (of which 370,000 are UK residents) registering on the capital's 32 electoral registers. This is because their residence and place of study are spread across the capital. The majority of students live in private accommodation across the capital rather than in halls of residence and therefore the pattern of student living reflects the price/quality of the private rental sector rather than simply the location of the Universities they attend. Lewisham contains Goldsmiths University with its 8,500 students. But with a large volume of affordable private rented accommodation, we estimate that the likely student population in Lewisham is well over double this figure. In addition our consistent experience in managing our electoral register is that older cohorts of our residents are much more likely to register than younger cohorts. Chart 3 below uses the ONS mid year population estimates by age for Lewisham and England.



¹ "The December 2015 electoral registers in Great Britain: Accuracy and completeness of the registers in Great Britain and the transition to Individual Electoral Registration" *The Electoral Commission* July 2016 p.42

This demonstrates that Lewisham has higher than average numbers in the 20 – 44 age group and significantly lower numbers of over 65s.

Nationality

The same Electoral Commission research shows that registration among eligible UK and Irish citizens was 86% complete, compared to 61% for Commonwealth citizens and 53% for EU citizens². The ONS annual population survey shows that in 2015, 10% of Lewisham population were born in the EU compared to only 4.5% nationally. This is a significant factor which would not be taken into account by use solely of the 1 December 2015 register.

Ethnicity

Lewisham is proud of the diversity of the local population. In 2013, 47.4% of its population came from black and minority ethnic groups, which is significantly higher than the London and Inner London averages (43.1% and 42.5% respectively). It is clear from the same Electoral Commission research that this "BAME" heritage group is less likely to register than others. Again reliance solely on the 1 December 2015 register would ignore this factor.

Tenure

It is widely accepted that high levels of "churn" in the private rented sector in London give rise to significant issues in trying to maintain an accurate and complete electoral register. In London some 90,000 households move home a month: almost two-thirds of these mobile households live in the private rental sector. One in four of Lewisham's households live in the private rental sector. Coupled with the younger profile of Lewisham residents, the "churn" in Lewisham will mean that those in private rented accommodation are less likely to appear in the electoral register.

Attitude toward voting

The Electoral Commission has also noted that attitudes to voting have a strong impact on register completeness. Those less likely to vote are less likely to register and older voters are more likely to vote than younger. Lewisham's population is predominantly young, as shown above. At the EU referendum turnout in Lewisham was 63.1% compared to the national average of 73.1%.

² Ibid p49

All of these factors indicate that even in July 2016 the numbers on the electoral roll in the Lewisham constituencies do not accurately reflect the number of people living in them who could register to vote. Irrespective of whether they are registered, we submit that they should all nonetheless be entitled to representation at a parliamentary level.

In conclusion, we ask the BCE not to rely solely on the 1 December 2015 electoral roll as the basis for the 2018 parliamentary boundary review. In our view this can be justified by:-

- the very significant increase in the electoral roll by 1 July 2016;
- the marked projected rise in the population over the next ten years; and
- the fact that the electoral roll in Lewisham is less complete than elsewhere as a result of local demography.

Finally, our recent experience is that a growing proportion of people register in order to vote when they know that an election is approaching. They do not register simply to be on the register (as they can reasonably expect to move home in the next six months). Thus the numbers on our register in December reflect an atypical and especially low register for Lewisham. I therefore urge the BCE to use the July 2016 figures to ensure that the people of the three Lewisham Parliamentary constituencies are fairly represented. It seems that Paragraph 40 of the BCE's guidance provides scope to do so as the BCE decides between the options available for the area.

Yours sincerely,



Barry Quirk CBE BSc PhD FRGS FRSA CIPFA (Hon)
Chief Executive

1. The first part of the document is a letter from the Secretary of the Department of the Interior to the Secretary of the Department of the Army, dated August 1, 1944. The letter is in response to a letter from the Secretary of the Army dated July 1, 1944, regarding the proposed construction of a dam on the Colorado River. The Secretary of the Interior expresses his opposition to the proposed dam, stating that it would be a violation of the National Antiquities Act and the National Historic Landmarks Act. He also states that the proposed dam would be a violation of the National Historic Preservation Act, which was enacted in 1966. The Secretary of the Interior also states that the proposed dam would be a violation of the National Historic Preservation Act, which was enacted in 1966.

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Very truly yours,

[Signature]

Secretary of the Department of the Interior

Electoral registers, 1 December 2015: Local government electors

		Total electors (1/12/15)	Total electors (23/6/16)	Change
Lewisham	E09000023	180,981	197,514	16,533
Bexley	E09000004	169,018	170,779	1,761
Havering	E09000016	181,518	183,082	1,564
Hackney	E09000012	162,225	163,284	1,059
Redbridge	E09000026	189,350	189,843	493
Tower Hamlets	E09000030	167,601	167,820	219
Lambeth	E09000022	210,721	210,800	79
Camden	E09000007	145,378	145,425	47
City of London	E09000001	6,874	5,987	-887
Bromley	E09000006	232,613	231,473	-1,140
Richmond upon Thames	E09000027	134,172	132,632	-1,540
Hillingdon	E09000017	194,881	193,033	-1,848
Sutton	E09000029	142,472	140,288	-2,184
Croydon	E09000008	247,957	245,349	-2,608
Wandsworth	E09000032	222,633	219,521	-3,112
Kingston upon Thames	E09000021	112,220	108,838	-3,382
Islington	E09000019	148,297	144,514	-3,783
Barnet	E09000003	228,812	223,467	-5,345
Greenwich	E09000011	174,946	168,967	-5,979
Hammersmith and Fulham	E09000013	121,293	114,863	-6,430
Barking and Dagenham	E09000002	123,292	115,812	-7,480
Enfield	E09000010	206,858	198,387	-8,471
Westminster	E09000033	129,289	120,524	-8,765
Haringey	E09000014	159,151	150,098	-9,053
Southwark	E09000028	205,046	195,875	-9,171
Kensington and Chelsea	E09000020	92,242	83,042	-9,200
Merton	E09000024	145,665	136,352	-9,313
Harrow	E09000015	174,770	162,397	-12,373
Waltham Forest	E09000031	175,449	162,983	-12,466
Hounslow	E09000018	179,447	165,050	-14,397
Newham	E09000025	196,010	176,985	-19,025
Brent	E09000005	211,400	186,793	-24,607
Ealing	E09000009	241,937	212,991	-28,946

1