

# Public Document Pack

## Elections Committee Agenda

Monday, 20 March 2017

**6.30 pm**, Civic Suite, Lewisham Town Hall, London SE6 4RU

Civic Suite

Lewisham Town Hall

London SE6 4RU

For more information contact: Sarah Assibey (Tel 0208 314 8975)

### Part 1

Item	Pages
1. Declarations of Interest	1 - 4
2. Minutes	5 - 7
3. 2018 Boundary Review London Region: Phase 2 (appendix E to follow)	8 - 40
4. Draft Work Programme for Election Committee (verbal report)	

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# **Elections Committee Meeting**

Monday, 20 March 2017  
6.30pm

Civic Suite  
LONDON  
SE6 4RU

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

Barry Quirk, Chief Executive  
Date: 9 March 2016

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# Agenda Item 1

ELECTIONS COMMITTEE			
<b>Report Title</b>	<b>DECLARATIONS OF INTEREST</b>		
<b>Key Decision</b>	No		<b>Item No. 1</b>
<b>Ward</b>	n/a		
<b>Contributors</b>	<b>Chief Executive</b>		
<b>Class</b>	<b>Part 1</b>	<b>Date: 20 March 2017</b>	

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 not 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 2

ELECTIONS COMMITTEE			
<b>Report Title</b>	<b>MINUTES</b>		
<b>Key Decision</b>	No		<b>Item No. 2</b>
<b>Ward</b>	n/a		
<b>Contributors</b>	<b>CHIEF EXECUTIVE</b>		
<b>Class</b>	<b>Part 1</b>	<b>Date: 20 March 2017</b>	

## **Recommendation**

To agree the Minutes of the meeting of the Committee, which was open to the press and public, held on 31 October 2016

# **MINUTES OF THE ELECTIONS COMMITTEE MEETING**

Monday 31 October 2016 at 7pm

PRESENT: Councillors John Coughlin, Brenda Dacres, Joe Dromey, Alan Hall, Stella Jeffrey (Vice-Chair), Jamie Milne, John Paschoud (Chair), Jacq Paschoud, John Slater

Also present: Steve Bullock (Mayor), Barry Quirk (Chief Executive), Councillor Brenda Dacres, Joe Dunton

Apologies: Kath Nicholson, Councillors Kevin Bonovia, Suzannah Clarke, John Kennedy, Paul Upex

## **1. Declarations of Interest**

No declarations of interest were made

## **2. Minutes**

RESOLVED that the minutes of 8 September 2016 be amended to include Councillor Dromey as in attendance for the Elections Committee meeting.

## **3. Proposals for Parliamentary Constituency Boundaries Report**

The Chief Executive, Barry Quirk, and Joe Dunton presented the proposals for the Boundary Commission (see appendix), countering their initial proposal.

Councillor Paschoud outlined that the intention of this meeting was that Members would have a substantive discussion about the proposals at this meeting and if any outcomes need be discussed within the party groups then it can be if necessary; then a recommendation from this Committee would go to the full Council meeting in November where a full Council decision will be awaited and would then reach the Boundary Commission deadline in December.

Councillor Hall enquired about the response from the letter the Chief Executive had sent to the Boundary Commission pointing out that perhaps they should consider the numbers, and whether or not some of the regulations implied that these could be considered, as pointed out in the recent Minutes Barry Quirk discussed the initial letter to, and response from the Boundary Commission, stating that it was unsupportive.

He stated that, our argument was that they were fettering their discretion, one of our strongest points was that we had a significant demographic increase and also our increase in numbers of registered electorate (both in comparison

to other boroughs) and those are points we need to make again to reiterate. If the government wants a register that best reflects the residents in a borough, we would argue that principally our proposal is inclusive.

The CE went on to explain the boundary proposals presented on the maps, one being the existing parliamentary constituencies, the second being the BCE proposals which extends Lewisham West northerly and an extension into Greenwich West and the Peninsula; then thirdly, the counter-proposal, which swaps the three Southwark wards from the middle part of its borough to the more southern part.

Joe Dunton pointed out that the counter-proposal is based on better alignment with borough boundaries not on development.

In response to a question asked as to whether the universities in Greenwich and New Cross effected if at all, the CE responded that it is likely that students in both Greenwich and Lewisham boroughs will be greater than the students that are attending, due to lower rental values in comparison to central and East London, where other universities are located.

The Chair asked members if they had any further contributions and substantially different ideas to the one provided by the CE, to which everyone agreed that the counter-proposal should be submitted as it is. He also suggested that once the draft conclusion is reached in this meeting, Lewisham should make contact with at least the political leadership of neighbouring boroughs, Greenwich, Bromley and Southwark, to better support any knock-on effects that might occur as a result of the counter-proposal.

RESOLVED that the counter-proposals will be submitted to the full Council before going to the Boundary Commission, inclusive of the arguments made in the letter sent to the BCE.

The meeting finished at 7.34pm

# Agenda Item 3

ELECTIONS COMMITTEE			
Report Title	Parliamentary Boundary Review – consultation 2 <sup>nd</sup> stage		
Key Decision	n/a		Item No.
Ward	n/a		
Contributors	Jamie Baker, Electoral Services Manager		
Class	Part 1	Date: 20 March 2017	

## 1. Summary

This report identifies the submissions made on the initial proposals of the BCE review and suggests a response from the London Borough of Lewisham in favour of our original counter proposal.

## 2. Purpose

To inform members of the second stage of the review and the opportunity to respond.

## 3. Recommendation

That the Committee note this report and agree the response.

## 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.
- 4.2 Initial proposals were published in September 2016 with a consultation period until 5 December 2017. All submissions were made available for inspection on 28 February 2018 and interested stakeholders are invited to make comments with a deadline of 27 March 2017.
- 4.3 Lewisham Council's elections committee responded to the initial proposals with a counter proposal. The counter proposal matched the Labour party's counter proposals.

- 4.4. A response to the second stage of the consultation should be focussed on other submissions received. If our opinions have been altered upon viewing other submissions we should make a comment. If we feel other submissions are not as good we should state the reasons why.
- 4.5 The BCE will use the submissions from both stages of the consultation to make a decision on their final proposals. There will be no third stage of consultation.

6. **Legal implications**

These are set out in the body of the report.

7. **Equalities implications**

There are no specific equalities implications.

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**

See Appendices A-E

A – Review 20-18 – report on submissions

B – Proposal comparisons – initial and the 3 parties

C – Submissions to the BCE regarding Lewisham constituencies.

Summary

D – Submissions to the BCE regarding Lewisham constituencies. Full text

E – Draft response to second consultation stage

# **Parliamentary Boundary Review 2018**

## **Report on submissions and counter proposals**

Jamie Baker

### **Summary**

- The review is being carried out by the Boundary Commission according to specific criteria set out in the Parliamentary Voting System and Constituencies Act 2011
- The Act makes significant changes to how reviews are carried out and includes new criteria such as reducing the number of constituencies and setting an electorate quota
- The initial proposals were published in September 2016. The consultation period was open to submissions and counter proposals until 5 December 2016
- Lewisham's submission was agreed by full council on 23 November. In our submission we made a counter proposal which mirrored the national Labour party's submission. We supplied various supporting arguments for how this submission was an improvement upon the Boundary Commission's initial proposals
- On 28 February 2017 all submissions will be published and a 4 week consultation period will begin – asking for comments on the submissions received during the first consultation period
- Specifically, the BC are asking us to look at what others have said about the initial proposals, and make comments on those – **the deadline to respond is 27 March**
- At the end of this 4 week consultation the BC will gather all submissions made during both consultation periods and decide on any revision of their initial proposals

### **How will Lewisham Council respond?**

- We can respond as a council, but we are actually made up of a number of different stakeholders in the electoral process; i) the council, ii) political groups, iii) the Acting Returning Officer (ARO)
- Clearly these 3 groups will have slightly different priorities and considerations. For example, the ARO will seek to remain as impartial as possible, whereas the political groups will be mindful of any political disadvantage the boundary proposals may cause
- Our response as a council will therefore need to be a measured response, based solely on the requirements of the review. Political groups will be free to submit their own additional response, as will the ARO should it be necessary

### **What will the process be for determining our response?**

- We have an Election Committee who will meet to discuss the various submissions, and agree on our final response
- Initially it will be electoral services and individual members of the committee who will review the various submissions
- A report will be drafted by electoral services and approved by the ARO and/or committee members before going to the committee at least 1 week prior to the meeting (20 March)

- The report will include a draft response for discussion by the committee – as the deadline to respond is 27 March it is important the meeting is used to agree the final form of our response

## **On what grounds can we pass comments on counter proposals/submissions?**

- The Act places specific criteria for how the review is to be carried out and what criteria must be used to create the new constituencies
- It is important we note where the initial proposals or counter proposals do not meet these requirements
- The requirements themselves can be found [here](#)

## **Key requirements for the review**

1. Statutory electorate range – each constituency must be no smaller than 71,301 and no larger than 78,507
2. Special geographical considerations – including the size, shape and accessibility of a constituency
3. Local government boundaries – including using wards as building blocks
4. Boundaries of existing constituencies – i.e. keeping wards within existing constituencies
5. Consideration of local ties – i.e. local ties that would be broken by changes in constituencies

## **What submissions have been received?**

This report will analyse the initial proposals and the submissions below, and establish which proposals, or combination of proposals, best meet the requirements of the review in the views of Lewisham council's election committee.

1. Counter proposals from the Labour party
2. Counter proposals from the Conservative party
3. Counter proposals from the Liberal Democrat party
4. A total of 52 submissions were received relating to constituencies linked to Lewisham borough (of which 9 bear no reference to Lewisham and are discounted in this report)
5. An additional 2 counter proposals are also worth consideration

*See appendices*

*B – Party Counter Proposal comparisons*

*C – Review of submissions*

*D – Text of submissions*

## **Review of Counter Proposals from the Political Parties**

Below will follow an analysis of the counter proposals from the Labour, Conservative and Liberal Democrat parties. No other complete proposals were submitted that are of sufficient detail and quality to be considered.

### **The Labour Party Proposals**

1. Requirement 1 – statutory electorate range
  - The constituencies all fall within the electorate range
  - The Lewisham West and Dulwich BC is at the lower end of the range
2. Requirement 2 – Special geographical considerations

- The shape of the proposed constituencies is a little odd
- The Lewisham East and Greenwich BC is long and thin, and at one point is only 1 ward in width (at Lee Green). The A21 goes along one side of this ward and clearly joins the ward with the both parts of the constituency
- The Lewisham, Deptford and Catford BC is a slightly less awkward shape, and the same goes for the Lewisham West and Dulwich BC

### 3. Requirement 3 – Local government boundaries

- All 3 constituencies apply the basics of this requirement well – they use existing wards as building blocks and the constituencies are made up of wards from up to 2 different authorities
- The 3 Southwark wards have been subject to a local boundary review and have been changed considerably. It is possible that the BC may wish to consider these changes as a whole with regard to adopting them for the new constituencies. In the case of the Lewisham West and Dulwich BC it would be possible to place the new Southwark wards in this constituency and the neighbouring one without significant changes to the constituency boundaries or electorate

### 4. Requirement 4 – boundaries of existing constituencies

- The majority of Lewisham wards are kept with other wards from the same existing constituency
- The wards of Catford South, Rushey Green and Crofton Park have all been moved away from other wards in their existing constituency. Clearly it is not possible to keep the existing constituencies exactly the same whilst also applying the electorate quota – hence some wards have had to move. This appears to be in line with the requirements of the review

### 5. Requirement 5 – consideration of local ties

- The definition of what constitutes as local ties is unclear – it is likely to be subjective rather than definite
- Ward boundaries in Lewisham are not all coterminous with community boundaries – e.g. the community of Catford does not fall wholly within any ward or group of wards
- Having said that, there are some wards which share particular identities
- Crofton Park has strong local ties to Brockley and Ladywell wards, but has been placed in a different constituency with wards that have weaker connections
- Similarly, Whitefoot and Downham wards have local ties with Catford South but have not been placed together
- The strict requirement for the quota makes it very difficult to keep all wards with local ties together. These proposals have made a choice about the strongest ties

### 6. General Overview

- In the context of the entire region these proposals are the most thorough and complete of all the submissions
- The report that accompanied their proposals gives a clear explanation for how they were developed and why certain decisions were made
- The solution to the issues presented by the initial proposals to some of our neighbouring boroughs have been solved – e.g. Lambeth which had parts of 6 different constituencies; and the various ‘orphan’ wards which unnecessarily broke requirements 4 and 5

- The solution for the Dulwich wards helps provide balance to the entire South London region, improving the shape and accessibility of many surrounding constituencies
- Although one constituency is an awkward shape, the boundaries are strong and accessibility is still good – i.e. one can travel from one end of each constituency to the other without crossing any constituency boundaries
- From a local ties perspective, the proposed constituencies have got a good balance – e.g. Forest Hill and Sydenham fit with Dulwich; Greenwich and Blackheath fit with Lee Green and Grove Park

## 7. Support from the Council

- These proposals were supported by Lewisham in our original response to the Boundary Commission's initial proposals. Our full response is attached to this report
- Our response cites several reasons why these counter proposals are superior, including:
  - i. Size, shape and accessibility – the Lewisham West and Dulwich proposal makes better use of the roads, bus and train routes
  - ii. Links with Greenwich – the connections to Greenwich Peninsula are difficult, regardless of which Lewisham wards are joined with it
  - iii. Deptford and Catford – both areas are transport hubs and share similar characteristics and future development
  - iv. The proposals significantly reduce the number of multi-borough constituencies
  - v. There are a fewer number of wards changing constituency
  - vi. Better transport between wards
  - vii. Minimised disruption for voters

## The Conservative Party Proposals

1. Requirement 1 – statutory electorate range
  - All constituencies fall within the quota
  - Their proposal for Lewisham East BC is at the very bottom of the quota
2. Requirement 2 – Special geographical considerations
  - The shape of the Lewisham and Deptford BC is less than ideal with the ward of Blackheath sitting in the middle but not within the constituency
  - Similarly, the Lewisham East BC also has an odd shape with the ward of Lewisham Central in the middle but in a different constituency
  - It would make more sense with regards to shape to swap the wards of Blackheath and Lewisham Central. This would also put an extra 2,000 voters in the Lewisham East BC making it more comfortably towards the middle of the electorate quota
3. Requirement 3 – Local government boundaries
  - The proposals easily fall within this requirement – wards are used as building blocks and no constituency is made up of wards from more than 1 local authority
  - However, the placement of Blackheath and Lewisham Central wards mean that voters within those constituencies will often have to move through another constituency

4. Requirement 4 – boundaries of existing constituencies
  - The boundaries of existing constituencies are respected to a degree – clearly it is not possible to keep all wards within the same constituencies they were in and remain within the quota
  - The Peckham and Lewisham West constituency is made up of wards from 3 different existing constituencies. Viewing the South London region as a whole it is inevitable that this will happen to several new constituencies
5. Requirement 5 – consideration of local ties
  - The Greenwich and Deptford BC appears to break several local ties and force new ones – e.g. separating Crofton Park from Ladywell and Brockley, moving Blackheath away from Greenwich West and Blackheath Westcombe, separating Lewisham Central and Rushey Green
  - Similarly in the Peckham and Lewisham West BC, significant parts of what are considered to be in Peckham are not included e.g. Peckham ward
6. General Overview
  - These proposals make the fewest changes to the BC's initial proposals of all the 3 party submissions
  - They include breaking one ward along polling district boundaries which is against the requirements of the review (Lesnes Abbey ward in Bexley)
  - The placement of Blackheath and Lewisham Central wards is inelegant as it creates awkward shaped and imbalanced constituencies
  - Their proposals do not touch on the issues in Lambeth and surrounding constituencies

## **The Liberal Democrat Party Proposals**

1. Requirement 1 – statutory electorate range
  - All meet this criteria
  - 2 constituencies are at the lower end and the other close to the upper limit
2. Requirement 2 – Special geographical considerations
  - The shape of the Greenwich and Deptford constituency places Lee Green out on the end slightly isolated from the rest of the constituency, with Lewisham West on the route one would take to Deptford
3. Requirement 3 – Local government boundaries
  - All 3 constituencies use wards as building blocks
  - There is again the issue of the Southwark wards which will change significantly for 2018. The addition of South Camberwell ward further complicates matters – perhaps Nunhead or Peckham Rye wards would have been a better fit and will create less future issues
4. Requirement 4 – boundaries of existing constituencies
  - All 3 proposed constituencies are made up of 3 different existing constituencies
  - This is perhaps the biggest difference with the initial proposals and the other 2 party submissions
  - These proposals still fall within this requirement
5. Requirement 5 – consideration of local ties
  - Brockley, Ladywell and Crofton Park can be considered to have significant local ties, but appear in 3 different constituencies

- Blackheath Westcombe appears in all other proposals alongside Blackheath and Greenwich West wards and is considered to have local ties. These proposals move it into another constituency

## 6. General Overview

- These proposals tend to agree with the Labour proposals regarding the breaking up of the Dulwich and West Norwood constituency which solves many issues in surrounding constituencies
- The knock-on effect of adding South Camberwell to the Dulwich wards means that Blackheath Westcombe is taken out of the Greenwich and Deptford constituency
- Overall the proposals are thorough and well thought out, and solve most of the issues for the region, but do not present the best possible result for Lewisham, with some slightly awkwardly shaped constituencies and the breaking up of the western wards of the borough

## Review of Other Submissions

Full information on the other submissions received can be found in appendices B and C.

Below is some analysis based on the themes that came out of the submissions:

1. Penge, Cator, Anerley – (wards that have moved from Lewisham West to Beckenham)
  - A high number of submissions relating to these wards
  - They were divided – many disliked being linked to Beckenham quite strongly, based on the significant demographic differences. Others support the move away from Lewisham as they had no links to the borough or the town centres
  - Many were in favour of being linked with Crystal Palace in a Bromley constituency, rather than in Bromley or Lewisham
2. Blackheath – including Blackheath, Lee Green, Grove Park wards, and Hither Green area
  - A lot of submissions relating to Blackheath
  - They want the area properly recognised and kept together
  - This includes Lee Green and Blackheath from Lewisham, Blackheath Westcombe from Greenwich and an area referred to as Blackheath Park (which isn't a ward name from any borough)
  - A couple of submissions refer to Hither Green being part of Blackheath, which is in Lee Green and Lewisham Central wards. They'd prefer this area kept together with Blackheath
  - There is some support for joining Blackheath with Greenwich but there are more strongly held views that Blackheath has no local ties to Greenwich but much stronger ties and transport links to Lewisham
  - Some strong opinions that Lee Green belongs with Lewisham and has zero links with Greenwich
  - One suggestion that Grove Park and perhaps Lee Green should be joined with a Bromley constituency
3. Brockley – the wards of Brockley, Ladywell, Crofton Park, Telegraph Hill and New Cross

- Various submissions supporting the ‘Brockley wards’ being kept together in a single seat
- Inconsistency in what the ‘Brockley wards’ actually are – some or all of the ones listed in the title
- They have significant local ties – community and transport links. As well as geographical boundaries

4. Forest Hill / Sydenham – wards of Forest Hill, Sydenham, Perry Vale and Bellingham

- These wards have much in common and strong local ties
- They should be kept within a single constituency

5. Penge – Cator, Penge, Crystal Palace wards

- 2 distinct opinions on this area
- Penge and Cator wards were previously in a Lewisham constituency and are moved to a new Beckenham constituency
- The majority would like to see Penge and Cator joined with Lewisham, or Croydon, as they have more similar demographics
- A minority are wholly in favour of the change

6. Population Growth, Registration, Gerrymandering

- These are common themes appearing in many submissions
- Many references are made regarding the anticipated population growth in many areas
- The 1/12/2015 register was inaccurate and thousands of Lewisham/London residents were not registered
- The proposals should take these factors into account
- Many submissions state they believe the review is an attempt at gerrymandering. No facts or comments are given to support these claims

Other Submissions worth considering

7. David Boardman – Kennington, Oval and Vauxhall Forum

- This submission presents a strong case for keeping together communities that span several wards
- It is a strongly defined local area that covers 3 wards in entirety, with another 2 strongly linked. Yet in the initial proposals they are separated into 3 different constituencies
- This situation is similar to what we are facing in Lewisham – and the solution would be similar
- The submission also suggests a new methodology for a review of the South London region

8. Mark Chapman – The Pirate Party

- Another interesting submission. The Pirate Party are the only other party to produce counter proposals for the whole London area
- The actual final proposals they come up with are numerically sound but ignore local ties in many areas

- They are worth considering as an alternative methodology if the commission decides it has to start again
- They are particularly strong in highlighting how a different methodology and using boroughs with local ties as a starting point can create a vastly different result

## **Conclusions from all submissions**

It is worth noting that Lewisham's response to the initial proposals mirror the Labour party proposals exactly – in terms of constituency shape. Lewisham's response also makes valid points about registration, local ties and minimal disruption for electors.

The counter proposals from the Labour party are the strongest of the submissions with regards to the whole of the South London region. The analysis above shows they meet the requirements of the review more closely than the initial proposals and the other counter proposals. The outcome for Lewisham's residents is also more favourable due to fewer wards changing constituencies and more local ties within constituencies.

The submissions from local residents give the impression that many people do not trust the motives for the review, and have little support for the methodology – particularly the requirement to use the December 2015 electoral register figures.

Many local residents showed they have strong feelings about what constitutes local ties, particularly in the areas of Blackheath, Lee Green and Brockley. The response from Lewisham needs to consider these views carefully and consider where these ties are not being kept in the counter proposals if this can be changed, and if it cannot, why that is the case.

This report will be shared with the Election Committee, Barry Quirk (the ARO) and Kath Nicholson (Head of Law) for comment. Please also see Appendix E – draft response to the Boundary Commission regarding the submissions to the initial proposals.

Ward	Borough	Electorate	2010 Constituency	Initial Proposals	Lib Dem Proposals	Conservative Proposals	Labour Proposals	Jamie proposals	
Brockley	Lewisham	10,337	Lewisham, Deptford	Greenwich and Deptford	Greenwich and Deptford	Greenwich and Deptford BC	Lewisham Deptford & Catford	North Lewisham and Greenwich	
Catford South	Lewisham	9,413	Lewisham East	Lewisham and Catford	Lewisham and Catford	Lewisham East BC	Lewisham Deptford & Catford	Lewisham Central	
Evelyn	Lewisham	9,129	Lewisham, Deptford	Greenwich and Deptford	Greenwich and Deptford	Greenwich and Deptford BC	Lewisham Deptford & Catford	North Lewisham and Greenwich	
Ladywell	Lewisham	8,688	Lewisham, Deptford	Lewisham and Catford	Lewisham and Catford	Greenwich and Deptford BC	Lewisham Deptford & Catford	Lewisham Central	
Lewisham Central	Lewisham	10,532	Lewisham, Deptford	Lewisham and Catford	Lewisham and Catford	Greenwich and Deptford BC	Lewisham Deptford & Catford	Lewisham Central	
New Cross	Lewisham	9,077	Lewisham, Deptford	Greenwich and Deptford	Greenwich and Deptford	Greenwich and Deptford BC	Lewisham Deptford & Catford	North Lewisham and Greenwich	
Rushey Green	Lewisham	8,053	Lewisham East	Lewisham and Catford	Lewisham and Catford	Lewisham East BC	Lewisham Deptford & Catford	Lewisham Central	
Telegraph Hill	Lewisham	9,824	Lewisham, Deptford	Peckham and Lewisham West	Greenwich and Deptford	Peckham and Lewisham West	Lewisham Deptford & Catford	North Lewisham and Greenwich	
Blackheath Westcombe	Greenwich	9,103	Greenwich and Woolwich	Greenwich and Deptford		Greenwich and Deptford BC	Lewisham East & Greenwich	North Lewisham and Greenwich	
Greenwich West	Greenwich	11,499	Greenwich and Woolwich	Greenwich and Deptford	Greenwich and Deptford	Greenwich and Deptford BC	Lewisham East & Greenwich	North Lewisham and Greenwich	
Peninsula	Greenwich	10,036	Greenwich and Woolwich	Greenwich and Deptford	Greenwich and Deptford	Greenwich and Deptford BC	Lewisham East & Greenwich	North Lewisham and Greenwich	
Blackheath	Lewisham	8,642	Lewisham East	Greenwich and Deptford	Greenwich and Deptford	Lewisham East BC	Lewisham East & Greenwich	North Lewisham and Greenwich	
Downham	Lewisham	9,072	Lewisham East	Lewisham and Catford	Lewisham and Catford	Lewisham East BC	Lewisham East & Greenwich	Lewisham Central	
Groves Park	Lewisham	9,249	Lewisham East	Lewisham and Catford	Lewisham and Catford	Lewisham East BC	Lewisham East & Greenwich	Lewisham Central	
Lee Green	Lewisham	9,182	Lewisham East	Greenwich and Deptford	Greenwich and Deptford	Lewisham East BC	Lewisham East & Greenwich	Lewisham Central	
Whitefoot	Lewisham	8,755	Lewisham East	Lewisham and Catford	Lewisham and Catford	Lewisham East BC	Lewisham East & Greenwich	Lewisham Central	
Bellingham	Lewisham	9,019	Lewisham West and Penge	Lewisham and Catford	Lewisham and Catford	Lewisham East BC	Lewisham West & Dulwich	Lewisham West & Dulwich	
Crofton Park	Lewisham	9,579	Lewisham, Deptford	Peckham and Lewisham West	Dulwich & Forest Hill	Peckham and Lewisham West	Lewisham West & Dulwich	Lewisham West & Dulwich	
Forest Hill	Lewisham	9,201	Lewisham West and Penge	Peckham and Lewisham West	Dulwich & Forest Hill	Peckham and Lewisham West	Lewisham West & Dulwich	Lewisham West & Dulwich	
Perry Vale	Lewisham	9,807	Lewisham West and Penge	Peckham and Lewisham West	Dulwich & Forest Hill	Peckham and Lewisham West	Lewisham West & Dulwich	Lewisham West & Dulwich	
Sydenham	Lewisham	9,663	Lewisham West and Penge	Peckham and Lewisham West	Dulwich & Forest Hill	Peckham and Lewisham West	Lewisham West & Dulwich	Lewisham West & Dulwich	
College	Southwark	8,312			Dulwich & Forest Hill		Lewisham West & Dulwich	Lewisham West & Dulwich	
East Dulwich	Southwark	9,127			Dulwich & Forest Hill		Lewisham West & Dulwich	Lewisham West & Dulwich	
Vilage	Southwark	8,592			Dulwich & Forest Hill		Lewisham West & Dulwich	Lewisham West & Dulwich	
Nunhead	Southwark	9,269	Camberwell and Peckham	Peckham and Lewisham West		Peckham and Lewisham West			
Peckham Rye	Southwark	9,463	Camberwell and Peckham	Peckham and Lewisham West		Peckham and Lewisham West			
South Camberwell	Southwark	8,471			Dulwich & Forest Hill				
The Lane	Southwark	10,550	Camberwell and Peckham	Peckham and Lewisham West		Peckham and Lewisham West			

	<b>REF</b>	<b>NAME</b>	<b>ROLE</b>	<b>ACTU</b>
Lewisham West	BCE-15204	Robert Lewis	Member of the public	Since I
Lewisham East		Kevin Bonavia	Local councillor or other elected official	This sp
Lewisham East	BCE-22526	Helen Reeves	On behalf of another organisation	Dear E
Lewisham East	BCE-20323	nicola Peers	Member of the public	I like th
Lewisham East	BCE-19295	Jacqueline Latraille	Member of the public	I have
Lewisham East	BCE-14504	Peter Swallow	Member of the public	Blackh
Lewisham Deptford	BCE-30009	Ross Archer	On behalf of another organisation	Counte
Lewisham East	BCE-16610	P Knight	Member of the public	Under
Lewisham East	BCE-27845	Andrew Lee	Official response from the Conservative party	East L
Lewisham Deptford	BCE-19280	Ben Holden	Member of the public	I believ
Lewisham Deptford	BCE-27376	Susan Shanks	Member of the public	I am co
Lewisham Deptford	BCE-15113	Martin Quinlan	Member of the public	I unde
Lewisham East	BCE-27466	Simon Partlett	Member of the public	My cor
Lewisham East	BCE-24588	Janice Senior	Member of the public	First of
Lewisham West	BCE-26712	Donald Harris	Member of the public	I was t
Lewisham West	BCE-18975	Dylan O'Sullivan	Member of the public	Regard
Lewisham West	BCE-17602	Alexander Leithes	Member of the public	Reduc
Lewisham West	BCE-15618	Charlie Brett	Member of the public	2 millic
Lewisham Deptford	BCE-24686	sev flowers	Member of the public	The pr
Lewisham Deptford	BCE-18299	David Littlefair	Member of the public	The bc
Lewisham East	BCE-18438	Ann Brandon	Member of the public	I think
Lewisham East	BCE-14420	Adrian Cooper	Member of the public	I reside
Lewisham East	BCE-15476	Pauline Mallory	Member of the public	I suggest

Lewisham East	BCE-15768	Edward Walkington	Member of the public	As son
Lewisham Deptford	BCE-15540	Steven Cuthill	Member of the public	Hello,
Lewisham Deptford	BCE-15681	Casper Below	Member of the public	The bc
Lewisham Deptford	BCE-17451	Kay Smith	Member of the public	The pr
Lewisham West	BCE-14497	Dominique Dyer	Member of the public	I live ir
Lewisham West	BCE-15058	Donal Mullane	Member of the public	Absolu
Lewisham East	BCE-21027	Tim Wakefield	Member of the public	I am co
Lewisham East	BCE-19441	Gerald Bates	Member of the public	There
Lewisham Deptford	BCE-19362	Trina Lynskey	Member of the public	I think
Lewisham East	BCE-25814	Andrew Scott	Member of the public	The pr
Lewisham West	BCE-16063	Brendan Cuddihy	Member of the public	I am co
Lewisham Deptford	BCE-18101	Jacob Stringer	Member of the public	It is cle
Lewisham Deptford	BCE-29911	Gordon Cowie	Member of the public	I am ve
Lewisham Deptford	BCE-15019	James Walsh	Member of the public	Would
Lewisham East	BCE-21534	Paul Regan	Member of the public	This si
Lewisham East	BCE-19434	anthony power	Member of the public	As a B
Lewisham West	BCE-26800	Bruna Zanelli	Member of the public	Why?
Lewisham West	BCE-20767	Chris Brody	Member of the public	This re
Lewisham West	BCE-17556	Paul Clift	Member of the public	I feel th
Lewisham Deptford	BCE-23220	Michael Coulston	Member of the public	I think

LINK	DETAILS
<a href="#">View &amp; Comment</a>	Lives in Beckenham, not Lewisham or Penge. Welcomes the change
<a href="#">View &amp; Comment</a>	Lewisham Councillor. Requests that all of Blackheath to be placed in a single constituency. It is a single community and needs a single MP to champion the common issues all parts of the area face, especially issues exacerbated by being in 2 different boroughs.
<a href="#">View &amp; Comment</a>	Blackheath Society. Would like to see all of Blackheath in one constituency. Suggests new boundary lines along roads rather than ward boundaries. Also Likes the proposal for Blackheath to join Greenwich. Would like to add Blackheath Park as well so that Blackheath village is reunited
<a href="#">View &amp; Comment</a>	The more wealthy parts of Blackheath and Hithergreen have been cut out of the constituency. Believes the new proposed boundaries are segregating the <del>Blackheath should not be in a Greenwich constituency. It is in Lewisham area</del> there is too great a distance to Greenwich
<a href="#">View &amp; Comment</a>	Current proposals for the Lewisham & Catford and Greenwich & Deptford seats would damage established community links and historic boundaries.
<a href="#">View &amp; Comment</a>	Lee Green ward forms a southerly "outcrop" of a new Greenwich and Deptford constituency. This breaks local ties and boundaries of existing From Lewisham East Conservatives. Initial proposals break local ties.
<a href="#">View &amp; Comment</a>	Blackheath and Lee Green wards be switched from Greenwich & Deptford to Wants to see different boundaries used for the Brockley/Deptford area - outside of ward boundaries
<a href="#">View &amp; Comment</a>	Believes Deptford deserves a single MP, rather than sharing with Greenwich to which it has no links
<a href="#">View &amp; Comment</a>	Registration data is out of date. Large population growth in the Deptford area. Deptford sits better with Southwark than with Greenwich
<a href="#">View &amp; Comment</a>	Forest Hill resident. Retain Forest Hill, Perry Vale, Bellingham and Sydenham and all these wards are in the current constituency of Lewisham West & Southwark resident. Not happy with her ward being moved from a Southwark constituency to a Lewisham one. Claims this is gerrymandering
<a href="#">View &amp; Comment</a>	Questions the motives for the review
<a href="#">View &amp; Comment</a>	Questions the motives for the review
<a href="#">View &amp; Comment</a>	Questions the motives for the review
<a href="#">View &amp; Comment</a>	Questions the motives for the review
<a href="#">View &amp; Comment</a>	Unrepresentative and not democratic
<a href="#">View &amp; Comment</a>	Not happy with the new boundaries. Doesn't give enough detail about their own situation to explain why they believe this. The methodology is crude.
<a href="#">View &amp; Comment</a>	Proposed boundaries are too confusing. They don't follow borough boundaries. I identify with Lewisham. Artificially changing that (in my view to Wants part of Lewisham (Hither Green and Grove Park) to move to a Bromley constituency. More local ties to Bromley than Lewisham, Deptford or
<a href="#">View &amp; Comment</a>	Lee Green - not keen on it being in a Greenwich constituency

<a href="#">View &amp; Comment</a>	Likes Deptford and Greenwich constituency as this unites areas that are arbitrarily divided by borough boundaries. Disagrees with Lee Green ward
<a href="#">View &amp; Comment</a>	Isn't happy with Hither Green being split being 2 different constituencies - it lies in Lewisham Central and Lee Green Wards.
<a href="#">View &amp; Comment</a>	Many communities are split in 2 parts. E.g. camberwell, peckham, vauxhall. The methodology has not led to improving local ties but in further breaking New constituency covers 2 local authorities. Would prefer them to represent only 1 authority
<a href="#">View &amp; Comment</a>	Lives in Penge east, which is currently part of Lewisham West and Penge. Too much difference with the rest of this constituency - demographics, social
<a href="#">View &amp; Comment</a>	Pleased that Penge and Cator wards are being moved away from Lewisham West
<a href="#">View &amp; Comment</a>	Wants zero changes to London due to huge population growth.
<a href="#">View &amp; Comment</a>	Comments on population growth in the Peninsula. Suggests moving the boundary to accommodate it
<a href="#">View &amp; Comment</a>	Initial proposals are good. Possible problems to face regarding population growth
<a href="#">View &amp; Comment</a>	Complaint about use of 1 December 2015 registration figures
<a href="#">View &amp; Comment</a>	Feels the use of the 1st December 2015 electorate figures have produced poor results and the review is poor for areas like ours
<a href="#">View &amp; Comment</a>	Low registration rates in some areas weaken the chosen methodology
<a href="#">View &amp; Comment</a>	Brockley (the area rather than the ward) is currently in Lewisham Deptford. Under the proposal it will be split between 3 constituencies (Ladywell ward to
<a href="#">View &amp; Comment</a>	The shape of these constituencies are long and thin. It would be better to square them off for more rounded shapes.
<a href="#">View &amp; Comment</a>	Wants more information. No comments
<a href="#">View &amp; Comment</a>	Beckenham resident. Strongly supports the proposals
<a href="#">View &amp; Comment</a>	Doesn't want any changes
<a href="#">View &amp; Comment</a>	Wants a review of our electoral and parliamentary systems. No comments on the proposals
<a href="#">View &amp; Comment</a>	No change is needed. Changes to the electoral and representative systems are what is needed
<a href="#">View &amp; Comment</a>	Not enough links to boroughs. Believes this is to facilitate MPs no longer interacting with local government, thus reducing their impact on local

## **THEME**

Beckenham

Blackheath

Blackheath

Blackheath

Blackheath

Blackheath

Blackheath, Lee Greem, Ladywell,  
Lewisham Central

Blackheath, Lee Green

Blackheath, Lee Green, Ladywell,  
Lewisham Central

Brockley, ward boundaries

Deptford

Deptford, population growth, registration

Forest Hill, Perry Vale, Bellingham and  
Sydenham

Gerrymandering

Gerrymandering

Gerrymandering

Gerrymandering

Gerrymandering

Gerrymandering

Gerrymandering and population growth

Grove Park

Lee Green

Lee Green, Ladywell, Telegraph Hill

Lee Green, Lewisham Central

Local ties

Multi-borough constituencies

Penge

Penge, Cator

Population growth

Population growth

Population growth

Registration

Registration

Registration

Registration. Blackheath, Rushey Green,  
Brockley wards

Shape

## **Submissions for Lewisham East constituency**

### **1. Cllr Kevin Bonavia**

My name is Kevin Bonavia. I am a councillor in the London Borough of Lewisham. I am also a Labour-elected councillor. I represent the ward of Blackheath. My working address is Catford Town Hall. I have been representing the Lewisham ward of Blackheath since 2010. I can tell you from my personal experience how that interrelates with our Members of Parliament who also represent Blackheath. Blackheath in its wider sense currently has three Members of Parliament, so in a sense you could say we are well represented in Parliament. Currently, we have three MPs for Lewisham East, Greenwich and Woolwich, and Southern Blackheath is covered by the Eltham constituency. It is not so much having Blackheath's voice in Parliament; it is what Members of Parliament can do with residents in Blackheath. Because we are split between two boroughs, Lewisham and Greenwich, as I am sure has been alluded to previously, what happens is that on occasion one borough gives and another takes away. To give an example, given the funding cuts over the past six years, Lewisham closed a library in Blackheath Village, which is split between the two boroughs, but was able to reopen its library service across the boundary in Greenwich in a place called Age Exchange, which previously had been funded by both boroughs. However, at the same time Greenwich borough had decided it no longer wanted to fund that, so that caused us a problem when we tried to move there. It would have been very helpful at the time to have one Member of Parliament making the case to both boroughs. This issue was picked up very much by the Blackheath Society a few years ago when the Boundary Commission was looking at proposals at that time. The society very strongly argued for one MP with feet in both boroughs who could make the case for general cross-Blackheath issues to both boroughs so we did not lose on the one hand when something is given elsewhere. That is my main argument for supporting the principle of the initial proposal to have at least Blackheath Westcombe and Blackheath wards kept together with one Member of Parliament resident in both. I see the Labour Party's counter-proposals. I would be very happy with those, too, but certainly from a Blackheath perspective I would strongly argue we need one Member of Parliament to cover the wider area.

I do not know whether you have ever visited Blackheath, but, to give you a feel for what it is, it is often seen by many people as not just an area but a concept. It is very green and people often see it as a very middle-class leafy area, but it is very varied. The central focus point is the village and heath itself. The borough boundary cuts across the heath on the A2, Shooters Hill Road, so south of that is currently in Lewisham East; north of that is Greenwich, which is currently the Greenwich and Woolwich parliamentary constituency. The boundary then goes south through Blackheath Village itself. That is where you have the issue; you have a lot of people who are not quite sure which borough they are in, but if they had a Member of Parliament who could speak for them that would go down very well in Blackheath locally with local businesses in Blackheath Village, many residents and community groups. I mentioned Age Exchange earlier. We have Blackheath Halls which is also on the boundary. That is in Greenwich but is funded by Lewisham council. We also have the conservatoire which provides music lessons for the children of Blackheath. I mentioned the Blackheath Society itself. We also have faith groups in Blackheath. We have the Catholic churches on the Greenwich side; the main Church of England churches are on the Lewisham side, but we all have to work together. I accept that so far the two Members of Parliament have cordial relations; they do get on, but it would be useful to have a Member of Parliament who had a good knowledge of the councils they have to work with.

I grew up on the Ferrier council estate on the Greenwich side. It has been demolished; it is now in the Eltham constituency. I grew up with an understanding of Greenwich. Having moved, I became a Lewisham councillor. They are both Labour councils but for historical reasons they have different

working cultures. I expect any Member of Parliament worth their salt to be a great advocate for causes in Parliament, but I also expect them to be great advocates for the local community. I expect a Labour or Conservative Member of Parliament, dealing with the same party in power locally, to have that arm's-length approach and be able to speak some uncomfortable truths to that borough, but it should be done from a position of knowledge and also standing. Obviously, if an MP represents the same people the borough has to cater for that person has standing. I am speaking here with my Blackheath hat on. Blackheath would certainly benefit from a strong advocate who had a locus with both boroughs.

## 2. Andrew Lee, Conservative Party

Andrew Lee

Chairman, East Lewisham

Type of respondent

Official response from the Conservative party

Counter-proposals for proposed Lewisham & Catford and Greenwich & Deptford seats

I write on behalf of the above Association in reference to the proposals for the revision of Parliamentary boundaries relating to the above proposed seats, published on September 13th 2016.

East Lewisham Conservative Association considered the Commission's proposals at a meeting comprising Conservative representatives from across the present East Lewisham Constituency.

It was strongly felt that the Commission's proposals would damage established community links and historic boundaries and we therefore wish to present an alternative plan.

Our proposals are that the Blackheath and Lee Green wards, currently in Lewisham East, be switched from the proposed new Greenwich & Deptford seat and incorporated in the new Lewisham & Catford seat.

We further propose that, to keep within the quota in both Parliamentary seats, the Ladywell and Lewisham Central wards (in the current Deptford seat) be moved from the proposed new Lewisham & Catford seat into the proposed new Greenwich and Deptford seat.

This would mean a change in the electorates of both seats of:

Greenwich & Deptford: 77,005 (under Commision proposals) changes to 78,401

Lewisham & Catford: 72,781 (under Commision proposals) changes to 71,385

The effect of these changes would be to keep 2 historically Lewisham wards together in the same Parliamentary Constituency. The Lee Green and Blackheath wards would then continue to form part of a wholly Lewisham constituency.

The Ladywell and Lewisham Central wards are both currently in the existing Deptford constituency and it would make sense to incorporate them in the new Greenwich and Deptford seat as they are both a better fit with the other Deptford Wards and , in particular, Ladywell ward has been a Deptford ward since the boundary changes in the early 1970's.

Similarly, both Lee Green and Blackheath have been in the existing East Lewisham seat over the same time period.

These changes do not involve any disturbance in the proposals for any other seat, fall within the electoral quota, make much more sense on the ground and help maintain the long-established affiliation of wards and activists.

These proposals have been incorporated into the Conservative Party's formal counter-proposals for London and we would therefore like to formally add our support to that submission.

### 3. Simon Parlett

My comments relate to the 3 constituencies you initially propose within the London Borough of Lewisham.

As a Forest Hill resident, my priority is to retain a constituency that unites the closely connected Forest Hill, Sydenham and Bell Green communities. This area is covered by the 4 Lewisham Borough wards of Forest Hill, Perry Vale, Bellingham and Sydenham and all these wards are in the current constituency of Lewisham West & Penge.

I suggest 3 Lewisham Borough wards are moved between constituencies to better reflect community links and, in particular, enable Bellingham ward to be re-united with Forest Hill, Perry Vale and Sydenham.

Change 1. Move Bellingham ward from the proposed Lewisham & Catford constituency into Peckham & Lewisham West. I note that, in the abandoned 2013 boundary review, Lewisham Council argued for Bellingham to be placed in a constituency with Forest Hill, Perry Vale and Sydenham due to strong community links.

Change 2. Move Telegraph Hill ward from Peckham & Lewisham West into Greenwich & Deptford. This would have the advantage of re-uniting the New Cross area and most of the Brockley area into one constituency and would follow the Lewisham/Southwark borough boundary between Telegraph Hill and Nunhead wards.

Change 3. Move Lee Green ward from Greenwich & Deptford into Lewisham & Catford. I am not familiar with the Lee Green area and propose this purely as a consequential change to enable each revised constituency to contain the required number of electors. However, I note that Lee Green ward is currently linked in the same constituency as Grove Park ward so re-uniting these seems logical.

Under my proposed changes, Peckham & Lewisham West would have 76,551 electors, Lewisham & Catford would have 72,944 electors and Greenwich & Deptford would have 77,647 electors.

As mentioned earlier, my priority is to argue for Forest Hill, Perry Vale, Bellingham and Sydenham wards to be retained in one constituency. I do not think there are many community links between this area and Peckham, so I'd be happy to support any alternative constituency proposal, so long as these 4 wards remain together.

I do not know the Peckham area that well, but it appears that you are proposing to divide Peckham town centre in two. I imagine Peckham residents will find this unpopular and will be making their own revised proposals anyway.

Finally, I will cover constituency names. I understand you like to retain existing constituency names where possible and the current constituency includes the name 'Lewisham West' which you propose retaining within the new name.

However, I believe Lewisham Borough's 3 existing constituency names are fairly unusual in referring to the Borough name, rather than the town/area name.

Lewisham 'town' is a specific area of the Borough and you propose placing the whole of it in a Lewisham & Catford constituency. This name is clearly referring to Lewisham 'town' and Catford 'town'.

As there will no longer be a Lewisham East or Lewisham Deptford constituency, I propose removing the name 'Lewisham West' as well to be consistent.

I suggest replacing your proposed name ending "& Lewisham West" with "& Sydenham", e.g. "Peckham South & Sydenham" or "Peckham Rye & Sydenham".

#### 4. Andrew Scott

The proposed boundaries are based on electoral register data that is now out of date as it is from December 2015. Lewisham has seen a massive increase in population since this time and we will, therefore be under represented in the House of Commons. This will be exacerbated by the area's relatively poor level of voter registration.

I urge the commission to reconsider these changes using up to date population data rather than the electoral register.

#### 5. Janice Senior

First of all not very helpful website. I put my postcode in to get the proposed change. Was surprised to say the least as my part of Peckham has been moved into Lewisham with an extremely odd shaped constituency with areas which have virtually nothing in common. Noting your notes about the criteria for deciding on boundary changes I clicked on the data button to find out why I had been moved. Again I was asked to supply my postcode which had not changed in those few minutes. Unfortunately the constituency which came up had. Not mine.

Therefore unable to look at your data. So have to make comments based on what the new boundary appears to be about. A short history lesson, I have lived in this immediate area since 1976. At that time I was in the Dulwich constituency. We were moved into Peckham in what appeared to have something to do with gerrymandering. There was a Conservative government who amazingly won Dulwich at the next election. My wards were always Labour. I am now moving into a constituency with areas very unlike us who may be not Labour voters. Gerrymandering again? Oh it's a Conservative government again. I object to the proposed change to my constituency.

#### 6. Dame Helen Reeves, Chair, Blackheath Society

Dear Boundary Commission,

I am writing on behalf of the Blackheath Society. Our Society has been established in Blackheath for 80 years and we currently represent a membership of 850 households. We have been closely

involved with every aspect of planning and community development throughout our history and we naturally we have an interest in the current boundary proposals.

Our committee is anxious to reinstate and to maintain the integrity of Blackheath as a single community. We are very happy to be identified with Greenwich with who we share many facilities and common interests but we are concerned that a significant area of Blackheath has been sectioned off and included in an adjacent constituency. In terms of local understanding and community interests this division makes no sense at all.

We would like to propose that the southern limit of the new constituency should be the main route known as Lee High Road to the west and Eltham Road to the east and in the southern part of the constituency the eastern boundary should be Kidbrooke Park Road.

Finally we are concerned that Blackheath seems to have disappeared altogether and we wondered about naming the constituency Greenwich, Blackheath and Deptford?

We would be grateful if these views could be given serious consideration.

#### 7. Paul Regan

This site is extremely poor and from it I am unable to understand how the proposals affect me or my immediate surrounding area. Please tell me how I can get more information. Thank you.

#### 8. Tim Wakefield

I am concerned at the changes to boundaries for my constituency. London and this area of Lewisham has seen great population growth and is forecast to increase considerably over the next few years. Given the proposed electoral size, I believe the majority of constituencies will be above the proposed sizes by the time of the changes.

It is therefore my view that the London constituencies, and my current constituency Lewisham West and Penge, remain as they are and are not amended. Urban areas are growing faster than rural areas and the electoral commission must recognise this.

#### 9. Nicola Peers

I like the proposal that Blackheath should join Greenwich however can you add Blackheath Park as well so that Blackheath village is reunited?

#### 10. Gerald Bates

There are thousands of extra units currently being built and planned on the peninsula - have these been taken into account? If not the 5% differential you are working on will have certainly been breached by the time this comes into force. May I suggest a bit of Deptford joins with Lewisham to allow for this?

#### 11. Anthony Power

As a Beckenham resident for many years I fully support the proposals for the Beckenham constituency.

The new boundaries form a much more logical area than previously when areas that were clearly part of Bromley were included in Beckenham and it is good that this is now going to be rectified. On the western side notwithstanding the local authority boundaries Spring Park Ward is closer to Beckenham than Crystal Palace Ward in that it abuts onto the current Beckenham constituency unlike Crystal Palace.

I strongly support the proposals.

#### 12. Jacqueline Latraille

I have looked at my local proposed change and the first thing that immediately hit me was the fact that the more wealthy parts Blackheath and Hithergreen has been cut out of my constituency. This would clearly indicate to me that the new proposed boundaries are segregating the poor from the wealthy and frankly is disgusting.

#### 13. Ann Brandon

I think the proposed boundaries are too confusing. This is because they don't follow borough boundaries. I understand where my home and community is - it's Deptford Constituency in Lewisham. I identify with that. It's my community and part of my identity. Artificially changing that (in my view to give the Tories electoral advantage) is a clumsy way of sorting out a problem that I don't think exists - or could be solved in other ways. And it's based on out of date population figures anyway.

#### 14. P Knight

Under the proposals, Lee Green ward (in Lewisham Borough and currently in Lewisham East constituency) would form a southerly "outcrop" of a new Greenwich and Deptford constituency. This takes insufficient account of the boundaries of existing constituencies and the local ties that would be broken by the proposed change for Lee Green ward. Lee Green ward (in terms of transport links, facilities and local services) is linked much more closely to Lewisham than to Greenwich and Deptford, and I consider that it should remain part of a constituency focused on Lewisham.

This is relevant for the ability of an MP to represent constituents in Lee Green ward – constituents in the Greenwich/Deptford area will have some quite different concerns from those in the Lewisham area, and an MP which primarily receives correspondence relating to issues affecting Greenwich and Deptford is unlikely to represent Lee Green ward as effectively as an MP who receives correspondence relating primarily to issues affecting Lewisham. For example, major concerns recently have been local hospitals and train services, on which local MPs have raised queries ministers in the Department of Health and Department for Transport. Greenwich and Lewisham are served by different hospitals and by different train lines, with different issues arising in each case. An MP focussed on Greenwich would naturally be inclined to prioritise the concerns of the majority of their constituents who use the Greenwich services rather than the small number of constituents who use Lewisham services.

There are, however, links between Lee Green and Blackheath (which is also proposed to be transferred from the existing Lewisham East constituency to a Greenwich and Deptford constituency). If it proves impossible to include Lee Green in a constituency focused on Lewisham, the southern parts of the proposed constituency (Blackheath and/or Lee Green) should be acknowledged in the name of the constituency, to give constituents and MPs an indication that the constituency includes these areas.

**15. Edward Walkington**

As someone who lives in Deptford but in Greenwich borough, I like your Deptford and Greenwich constituency as this unites areas that are arbitrarily divided by borough boundaries.

However, I disagree with Lee Green ward being included in this constituency.

Lee and Hither Green nothing in common with Deptford and Greenwich - they are the other side of Lewisham town centre. There are no direct bus links between Lee / Hither Green and Greenwich or Deptford.

You've also split the New Cross and Brockley areas unnecessarily.

It would be more far more sensible if Lee Green were included in the Lewisham and Catford constituency, Ladywell included in the Peckham and Lewisham West constituency, and Telegraph Hill included in Greenwich and Deptford.

**16. Pauline Mallory**

I suggest The boundary runs along Lee Park or second best would be Lee High Road.

Or rename the new constituency as we are proud To be Lewisham And are certainly not 'Greenwich And Deptford'.

**17. Peter Swallow**

Blackheath is in Lewisham, is part of the Lewisham Council area and is separated from Greenwich by two massive parks. It seems the height of folly to arbitrarily stick it on the end of a Greenwich constituency. There is a reason why it currently sits in the Lewisham East constituency -- because it is in Lewisham.

This proposed boundary change would isolate Blackheath from its new constituency, cut apart its local and national government, create unnecessary confusion and fail to take into account its strong community ties to Lewisham.

**18. Adrian Cooper**

I reside in Lewisham & Catford borough in the existing and planned proposals. The area in which I live bears little resemblance to the rest of Lewisham and catford, having more in common with neighbouring Bromley in terms of needs. I would suggest a cleaner boundary would be to include the area south of the A205 and east of the railway line from Hither Green to Grove Park in Bromley constituency.

**Submissions for Lewisham West constituency**

**19. Bruna Zanelli**

Why? It makes no sense. Another crackpot idea from some under worked so called politician who needs to prove his worth. Forget it. If it isn't broken don't mend it.

We have a hard working MP, Gavin Barwell, who is always approachable and hands on. We do not need to change anything.

**20. Donald Harris**

I was born 91 years ago so have observed Boundary Commission decisions more than once and I know what this means - it means that the people in power feel uneasy and want to make sure they stay that way by fiddling the boundaries so as to increase the likelihood - better still, make certain - that they will stay in power after the next "election". Rather like the charade which gave Clinton more votes than Herr Trumpf but secured the presidency for him - by cheating (what else is an "electoral college"?).

The Afrikaaners, in South Africa got Malan into power by similar means - by making one country vote worth several city ones.

So; I know what to expect, then.

Those that have power are resolved to keep it -AT ALL COSTS.

**21. Chris Brody**

This review is all very well but does not in any way address the key issue of the representation of the people's will in Parliament.

We need a root and branch review of the electoral system, which currently enables minority interests to trample over the views of the majority. The review needs to consider basic constitutional issues, including the makeup of the House of Commons, the nature of the executive, and the very existence of the House of Lords. For example, proportional representation in the latter would make for a more balanced and democratic legislature. But such changes cannot be made piecemeal.

What this country desperately needs is a peoples' constitutional assembly, with a mandate to create a living, written constitution for the benefit of people and planet.

**22. Dylan O'Sullivan**

Regardless of the changes the idea that a boundary shift can be made that clearly disadvantages one party over another without first having a general election is completely undemocratic. To simply remove a large number of Labour seats at a time when an unpopular Tory government will be given an almost uncontested power base as a result is a complete disregard for democratic process.

**23. Alexander Leithes**

Reducing the number of constituencies in the predominantly Labour voting and controlled London sounds a lot like gerrymandering by the Tory government. Please do not allow the boundary commission to be used as a political tool for the Conservative party in a grubby scheme to maintain their control of parliament and the country. Do not reduce the number of constituencies.

**24. Paul Clift**

I feel that this is a false exercise and that the constituency boundaries should remain as they are. Reducing the number of elected representatives is not the way to gain greater accuracy of representation; that is only achieved by changing the electoral system from First Past The Post, which produces a zero-sum result that plasters over a complex voting pattern among the electorate to a system of Proportional Representation.

This boundary-changing is tinkering at the edges of a much more complex challenge.

**25. Brendan Cuddihy**

I am concerned that by basing constituency size on electors (and specifically numbers of voters registered for the 2015 general election), this does not fairly represent populations. Since elected MPs represent all of the people of their constituencies and not just registered voters, it would seem more appropriate to model constituencies around population size. The currently proposed plan will unfairly disadvantage areas where voter registration is lower.

**26. Charlie Brett**

2 million people are missing from the electoral register that you are using for a start. Why not use population rather than those on the electoral register.

This is just gerrymandering, you're clearly bought and paid for by the Conservative Government. If this wasn't the case why would the Conservatives, who let's face it don't do anything which might possibly harm them, love this so much.

Perhaps because they are paying for it to harm their opposition. if the boot was on the other foot and the conservative party were losing safe seats do you think that they would allow this to go forward as it is.

My area in Anerley is better represented in terms of the local community by the current boundary because Crystal Palace and Penge are far more naturally conjoined areas than Crystal Palace and Croydon for which the public transport options are less available. The public transport routes and accessibility between the two areas should be taken into account as much as where peoples homes are and how many people are in them. Similarly the amount of homes in an area is all well and good but what about the areas through which people have to travel to get to work. The main transport route for me to work is Penge East which would no longer be under the control of the same council.

RUBBISH RUBBISH RUBBISH!

**27. Robert Lewis**

Since I live in Beckenham, not Lewisham West or Penge, I welcome the commonsense boundary change proposed.

**28. Donal Mullane**

Absolutely delighted that Penge and Cator Wards are proposed to move to the Beckenham Constituency from Lewisham West. I live in Cator Ward, which is in Beckenham, in the London Borough of Bromley. I have no affinity whatsoever with Lewisham, so to be in a Lewisham constituency simply made no sense. Thank you.

**29. Dominique Dyer**

I live in Penge east, which is currently part of Lewisham West and Penge. It is a mostly deprived/poor area, and under the current plans will become a part of the wealthy Beckenham ward. Penge will become the ONLY part of the constituency that is not well off - also the most "inner London" part .. This means we will have no voice in parliament. None of the issues affecting places like Shortlands,

Hayes, Bromley, Beckenham or West Wickham will effect us. Also Penge is a multicultural area with a high non white population - the rest of the proposed ward is mostly white.. Will our ethnic minority voices be listened to? I don't think so. Penge East should stay part of Lewisham or become part of Croydon North or our voices will never be heard.

### **Submissions for Lewisham Deptford constituency**

30. Ross Archer, Conservative Party

Counter-proposals for proposed Lewisham & Catford and Greenwich & Deptford seats

I write on behalf of Lewisham Deptford Conservative Association in reference to the proposals for the revision of Parliamentary boundaries relating to the proposed Lewisham & Catford and Greenwich & Deptford seats published on September 13th 2016.

I believe the current proposals for the Lewisham & Catford and Greenwich & Deptford seats would damage established community links and historic boundaries and I therefore support an alternative plan.

I believe that if the Blackheath and Lee Green wards, currently in Lewisham East, were switched from the proposed new Greenwich & Deptford seat and incorporated in the new Lewisham & Catford seat. And if the Ladywell and Lewisham Central wards (in the current Deptford seat) be moved from the proposed new Lewisham & Catford seat into the proposed new Greenwich and Deptford seat. I believe that these changes would help keep local ties in both seats and mean both are still within quota.

This would mean a change in the electorates of both seats of:

Greenwich & Deptford: 77,005 (under Commision proposals) changes to 78,401

Lewisham & Catford: 72,781 (under Commision proposals) changes to 71,385

The effect of these changes would be to keep 2 historically Lewisham wards together in the same Parliamentary Constituency. The Lee Green and Blackheath wards would then continue to form part of a wholly Lewisham constituency.

The Ladywell and Lewisham Central wards are both currently in the existing Deptford constituency and it would make sense to incorporate them in the new Greenwich and Deptford seat as they are both a better fit with the other Deptford Wards and, in particular, Ladywell ward has been a Deptford ward since the boundary changes in the early 1970's.

Similarly, both Lee Green and Blackheath have been in the existing East Lewisham seat over the same time period.

These changes do not involve any disturbance in the proposals for any other seat, fall within the electoral quota, make much more sense on the ground and help maintain the long-established affiliation of wards and activists.

These proposals have been incorporated into the Conservative Party's formal counter-proposals for London and we would therefore like to formally add our support to that submission.

### **31. Gordon Cowie**

I am very unhappy with the proposed constituencies as they affect my local area, and the proposal seems totally unacceptable. Brockley (the area rather than the ward), which is my neighbourhood & immediate local area, is currently in Lewisham Deptford. Under the proposal it will be split between 3 constituencies (Ladywell ward to Lewisham & Catford; Brockley ward to Greenwich & Deptford; Crofton Park & Telegraph Hill wards to Peckham & Lewisham West). Brockley is a cohesive area with many local links within it. This proposal totally goes against the principle of taking account of local ties. It will make it more difficult to lobby local MPs on issues in a coordinated way and will make it more difficult to organise hustings etc.

In addition the London boroughs, in this case Lewisham borough, play an important part in creating a local community identity. This would be reduced by the proposal with only one constituency being totally in Lewisham & 2 others being only partly in Lewisham.

My proposal for a local constituency that meets the numbers criteria & keeps local ties, would be to add Blackheath ward to the current Lewisham Deptford constituency, or alternatively part of Blackheath & part of Rushey Green wards as I think local ties are more important than ward boundaries.

I also think that this is very poor time to be doing such a large reorganisation. Firstly it uses the electoral role created immediately after individual registration came, which is likely to under represent numbers of potential voters in a relatively mobile area like Lewisham. Secondly, in the current political climate, it seems particularly important to strengthen links between MPs & local communities. This proposal would seem to weaken them.

### **32. Susan Shanks**

I am concerned that, under these new changes, Deptford, London, will lose its MP and will not benefit from the political representation it deserves, or to which it has a right. Not only that, but citizens in Greenwich will suffer from an overstretched parliamentary representative.

This public consultation has not been well publicised enough, in my opinion. This website provides nothing to accompany the map to help residents of each area understand the potential impact of the changes in each area, and this is a major failing.

### **33. Sev Flowers**

The proposed changes are undemocratic! They put too much power into the hands of the conservatives which is unrepresentative of the voting British public. The majority of voting people in this country do NOT vote for the conservatives. Take that into consideration and make the boundary changes more democratic!

### **34. Michael Coulston**

I think that parliamentary constituencies are being separated from the boroughs to an unnecessary extent. I think that this is part of a deliberate move to remove a kind of right of appeal or higher authority, because MPs will have an excuse not to intervene in Council matters on the grounds that they answer to two or three different councils. More effort should have been made to make as many constituencies as possible within the boundaries of only one borough.

**35. Trina Lynskey**

I think my new constituency of Greenwich & Deptford is good. There may be an issue with 2 of the wards Evelyn (Lewisham) and Peninsula (Greenwich) which will see significant population increase in the next 10 years. The bit of the new constituency south of the B220 is a bit of an odd add-on. Overall, I think it's fine. I think this is a better fit for the area I live in.

**36. Ben Holden**

I believe proposed boundary changes in the Brockley/ Lewisham Deptford area are inappropriate.

In particular I don't understand why the boundary of the Ladywell and Lewisham constituency doesn't follow Brockley Road. (or in fact I do, I understand this is an a council electoral ward boundary, which itself doesn't make sense and shouldn't be used for something as important as an MP constituency boundary.

The MP for this area will naturally focus on Lewisham, Catford and Ladywell. These are areas which have limited public transport from SE4 2BA and the adjoining streets and limited physical proximity because of the large parks separating SE4 2BA from Lewisham and Catford and Ladywell (namely Hilly Fields and Lewisham and Deptford Cemetery).

Brockley road forms a natural boundary and should be used in full. the Roads around SE4 2BA would naturally fall within either the Brockley/Deptford, or Nunhead and Crouton Park constituencies, directly north and south of these SE4 2BA and adjoining streets along Brockley road. Where there is regular public transport and natural walking routes.

**37. David Littlefair**

The boundary for my local area is completely changing and seems to only keep 20% or so of the original mapping. I feel like this is a mistake. My MP will no longer be familiar with her constituents, for one, and I have no idea - given how radically this is changing the geographic layout of my constituency- what processes have gone into redrawing the boundaries to prevent politicized gerrymandering

I also believe that the method of creating boundaries based on a specific number of people is crude. Some areas might have differing needs at a local level and there seems to be oversimplification here.

**38. Jacob Stringer**

It is clearly unjust that boundaries are set according to how many voters are registered rather than how many are eligible. We know that older, whiter, more established, (and so richer) people are more likely to be registered. This aspect of the law/regulations needs to change before any constituency boundary changes can be considered worthwhile. The proposed boundaries compound inequality by increasing disenfranchisement.

**39. Kay Smith**

The proposed constituency for my area would cover 2 local authorities. Southwark and Lewisham. Wouldn't it be difficult for the MP and local councillors to represent constituents in 2 different local authorities?

At the moment it's difficult to get an appointment with an MP working in one Local authority area.

#### 40. Caspar Below

The boundary review is counter productive to electorate engagement and ultimately undermines MPs standing in the community, because MPs would represent 3 halves of communities around town centres, rather than one or two complete ones.

People want to address the MP for Peckham, or Camberwell, or Camberwell and Peckham, but not half of Camberwell, a bit around Vauxhall bridge and some of Peckham. The split from East to West is counter intuitive for people who live here. It fragments local communities further, it makes parliamentary politics seem aloof and unconnected and ultimately less useful.

This boundary review is an opportunity to bring communities together, not to promote further division.

#### 41. Steven Cuthill

Hello,

I must object to the arbitrary change that splits Hither Green in half. It makes no logic in doing this and has no support in our community.

Either merge all of Hither Green into Lewisham or Greenwich but please do not devide up our community.

#### 42. Martin Quinlan

I understand that the Boundary Commission is constrained by having been required to use 2015 electoral roll data, but it brings the whole process into disrepute when it is clear to everyone that the electoral roll data used to revise boundaries is flawed from the outset.

In terms of my own constituency, it is clear that the boundaries of the new constituency of Greenwich and Deptford have been drawn based on a "needs must" basis rather than any obvious sense of the wards across the Lewisham and Greenwich boundary having any actual connection to each other (Deptford wards have much more in common with those across the Southwark border than the Greenwich border).

The proposed constituency is also at the upper end of the constituency size range, ignoring the known fact that the electoral roll being used for the exercise is particularly flawed in such areas of London and thus the constituency in reality will be over the prescribed voter number limit from the outset (which will be proven in due course if and when 2016 numbers are considered) and that development of the areas on both the Greenwich and Deptford sides means that the disparity between the average constituency size and that of this new constituency will grow significantly over the next 5-10 years. Such factors are of course difficult to include in the exercise, but where they are as obvious as they are here I'm at a loss as to why they are not taken into consideration if the proposed constituency is so close to the upper boundary.

I hope Parliament rejects these proposals as they stand so that the redrawing of boundaries for a new 600 seat House of Commons can be based on more honest data.

#### 43. James Walsh

Would it not be better to square these two halves of a constituency off rather than have to long protest interlocking fingers of a borough?

## General Comments

### 44. David Boardman, KOV

Representation by Kennington, Oval and Vauxhall Forum to the Boundary Commission for England about proposed new Parliamentary Constituencies for London

#### Who we are

1 KOVF is a neighbourhood forum, with some 700 members, recognised and funded by the London Borough of Lambeth as a non-political umbrella group bringing together local community organisations, businesses and residents, in the North Lambeth area between Lambeth Road, Kennington Park Road, Camberwell New Road, Harleyford Road and the river Thames [essentially the two Lambeth Wards of Oval and Prince's, with a small element of Bishop's Ward south of Lambeth Road]. At present this area lies exclusively within the Vauxhall Parliamentary constituency, with a local MP heavily engaged in issues arising in our area, with boundaries unchanged for over a decade.

2 In practice, Kennington, Oval and Vauxhall are overlapping descriptions, and there is no generally recognised set of internal boundaries between them. But the external boundaries of the combined grouping are reasonably settled, and there was no public dissent when the whole of the Forum's area and the Forum itself were recognised as being sufficiently coherent to be designated by Lambeth Council for the production of a Neighbourhood Plan for the area in July 2015. Prince's and Oval Wards were also put together in July 2014 as a natural grouping, as the Council's Co-operative Local Investment Plan (CLIP) area for North Lambeth, which organises the spending of locally earmarked S106 and Community Infrastructure Levy (CIL) monies.

#### Impact of the proposals – The 3 Way Split of our KOV area

3 Given this well-recognised unity of our community, we were amazed to find it distributed between no less than three constituencies in the draft (4, 8 and 13), within the space of a 400m walk north to south along one of our principal main roads, Kennington Road. Only Oval Ward would remain within a predominantly Lambeth constituency, while Bishop's Ward would be a singleton Lambeth Ward within a predominantly Southwark constituency, and Prince's one of only two Lambeth wards brigaded with Southwark wards to the east. We must expect such minority status within a constituency, bolstered by no natural links, to be detrimental to adequate parliamentary representation or attention. Such a partition does not respect local links, nor principal public transport routes, which run predominantly north and south. Indeed, it was the lack of direct public transport links east west which led the Post Office, in July 2014, to abandon its proposals to close Kennington Post Office and merge its business with the Walworth Road office in Southwark to the east.

4 We therefore urge that our local links be respected and Prince's and Oval Wards in particular be grouped with other wards to form a predominantly Lambeth based constituency.

#### Wider impact of the methodology for Lambeth and South London

5 In circumstances like these, the Commission Consultation document (para 69) urges respondents "to bear in mind any knock on effects that might result from their suggestions." Given the disconcerting prospect that our three adjacent constitutive wards or ward elements might find themselves in three different constituencies, we have looked at the extent of this over-fragmentation of boroughs first in Lambeth itself, then more widely, particularly for the South London sub-region.

6 It is impractical for a group such as ours to rework the whole of London at a ward level in consequence of our proposal, but we note that the wider Lambeth borough is proposed to be partitioned between no less than 6 constituencies, when the electorate of 188,189 amounts to about 2.51 constituencies with a nominal size of 75,000, with a benchmark of 3 constituencies, rounding up. We regard the excess of  $6 - 3 = 3$  constituencies as a measure of the over-fragmentation of Lambeth under the current proposals, correlated with the splitting of natural communities.

7 Turning to the wider London picture, the BC London proposals, eg at Annex A, concentrate on which wards go into which constituencies, rather than how many constituencies individual boroughs are split into. So we have inverted the process in the attached spreadsheet, identified how many constituencies of nominal size (75,000 electors) each borough would amount to, rounded up to the nearest whole number above, then computed the difference between this benchmark figure and the actual number of constituencies between which the borough is shared. This difference is a measure of the excess fragmentation of that borough, likely involving the division of natural communities. In a few asterisked cases we have rounded down where the 5% size tolerance would permit this.

8 When you graph this excess (see map attached), you see that Lambeth, with Merton, have the highest excesses, at 3 each (Lambeth 3 nominal, 6 actual, Merton 2 nominal, 5 actual). Indeed, there is a South London cluster of over-fragmented boroughs (Lambeth, Merton and Croydon), surrounded by boroughs with 0s and 1s. Essentially, we find that this cluster, for whatever reason, becomes the dumping ground for the problems thrown up by the methodology of tight numerical limits, varied ward sizes between London boroughs, and a policy of no breaking ward boundaries.

9 Over-fragmentation of natural communities to different MPs reduces the territorial link and tilts the franchise arrangements towards an “any 75,000 electors will do” approach, reminiscent of the European Parliament franchise, which is correlated with reduced democratic engagement, low representative recognition among constituents and lower esteem for the whole process.

10 We consider that the South London model should be run again, this time from the centre outwards, to spread what appears to be the inevitable fragmentation more evenly over the South London area.

#### 45. Mark Chapman, Pirate Party

South London:

Whilst there are a number of possible ‘groupings’ in South London, we originally treated it as a single sub-region. However,

it naturally divides into the following groups of Boroughs:

Richmond and Kingston (3 seats in total, 2 seats south of the Thames):

Wandsworth, Merton, Sutton, Croydon, Lambeth (12 seats)

Bromley (3 seats)

Southwark, Lewisham, Greenwich, Bexley (9 seats)

Bermondsey and Old Southwark (77,623): Unlike the BCE, we don’t cross the border with Lambeth, and so this seat is simply the existing seat with the exchange of Faraday ward for Newington ward.

Camberwell and Peckham (73,463): Instead of a somewhat odd and unnatural linking with the Lambeth wards of Vassall and Prince's in the BCE's 'Camberwell and Vauxhall Bridge' we keep this as a Southwark only seat more closely based on the existing Camberwell and Peckham. We lose Faraday ward to Bermondsey and Old Southwark in exchange for Newington ward, and also lose Peckham Rye ward.

Dulwich and Forest Hill (73,744): Instead of the current link with the West Norwood area of Lambeth, we link Dulwich with the Forest Hill area of Lewisham. There are good communication links between the 2 areas along the South Circular, and the railway lines.

Lewisham and Catford (72,781): As the BCE – this takes the southern-most wards of the Lewisham borough

Greenwich and Deptford (76,793): A cross borough Lewisham-Greenwich seat focused on the "Maritime Greenwich" area this is the same as the BCE except that Telegraph Hill ward is included (thus maintaining the Southwark-Lewisham boundary) and Peninsular ward is excluded.

Woolwich (78,107): Relative to the existing Greenwich and Woolwich this seat has less change than the BCE's proposal, losing just Greenwich West and Blackheath Westcombe, and gaining the remaining 3 Greenwich wards along the river (Thamesmead Moorings, Abbey Wood and Plumstead). This respects the boundary with Bexley in this area and is a logical 'Thames-side' seat which follows the strong east-west lines of communication.

Eltham (77,628): Relative to the BCE's proposal which adds Woolwich Common to the existing seat, we instead propose adding the 2 Bexley wards of Falconwood and Welling and East Wickham.

Bexley and Sidcup (73,127): Relative to the current constituency, we propose losing the 'Welling' wards to Eltham as above, and replacing them with the 3 Bexleyheath wards (Christchurch, Barnehurst and Crayford)

Erith (76,277): The remaining wards of Bexley – that is relative to the BCE's proposed 'Erith and Crayford' this takes Lesnes Abbey, St Michaels and Danson Park instead of the 3 Bexleyheath wards listed above which we believe are a better fit with the Bexley seat.