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

Dear Mr Simmons,

Lewisham Deptford, Lewisham East, Lewisham West

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

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

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

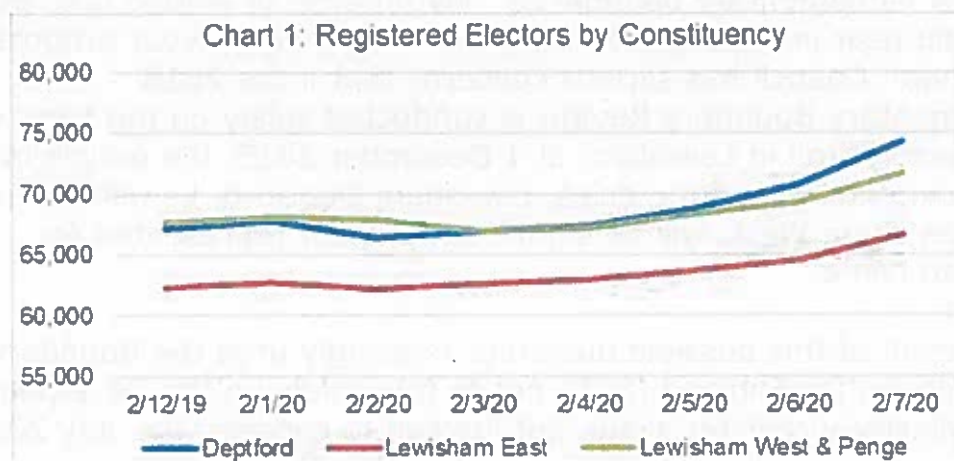
registers on the 'review date' – namely 1 December 2015. Whilst this number is given precedence in the Act, we ask that the BCE adopt the approach to the electoral numbers set out in the statutory guidance. It is clear from that guidance that it is not intended that the electoral number as at 1 December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

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

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

#### The impact of the EU referendum on registration in Lewisham

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

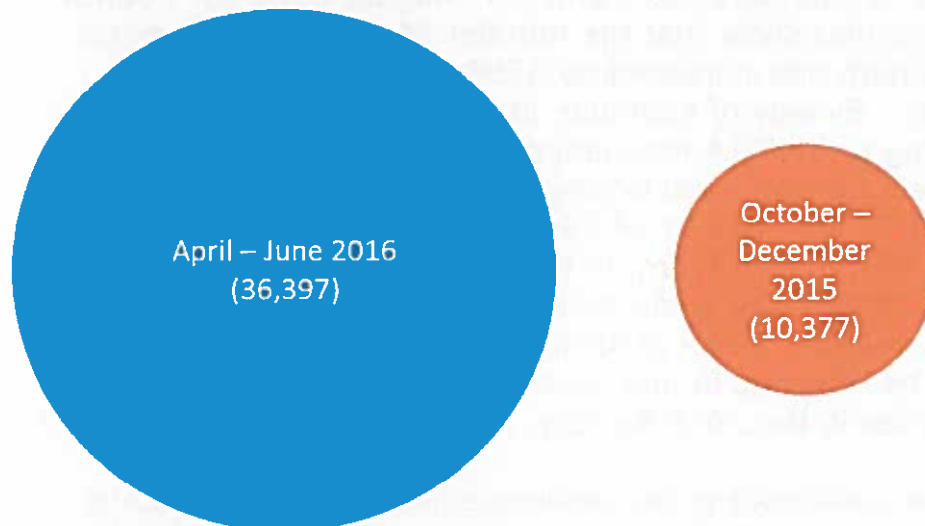


No doubt this was precipitated generally by the extent of public interest in the EU referendum as the date approached and by successful campaigns to promote electoral registration. This increase in demand for registration was evidenced by the collapse of the Government's own website

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

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

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



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

#### Population rise

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

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

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

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

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

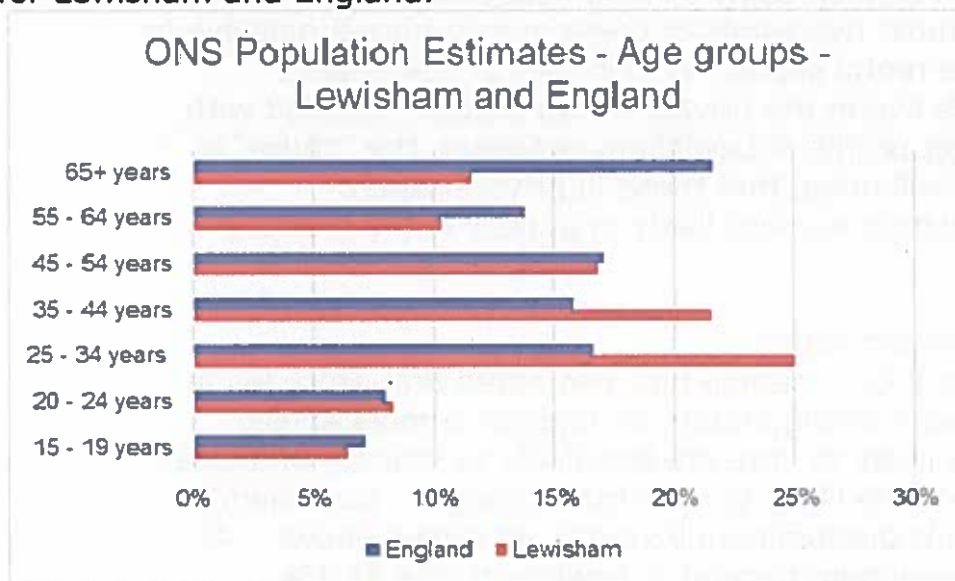
The rapidly growing population and relentless drive to build new homes to meet the London Plan for housing development over the next 10 to 15 years underlines the importance of getting the base count right now. There is otherwise an inherent danger that the outcome of the Review will be undermined by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

## Register completeness

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

### *Students and Age*

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



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

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

### *Nationality*

The same Electoral Commission research shows that registration among eligible UK and Irish citizens was 86% complete, compared to 61% for Commonwealth citizens and 53% for EU citizens<sup>2</sup>. The ONS annual population survey shows that in 2015, 10% of Lewisham population were born in the EU compared to only 4.5% nationally. This is a significant factor which would not be taken into account by use solely of the 1 December 2015 register.

### *Ethnicity*

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

### *Tenure*

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

### *Attitude toward voting*

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

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<sup>2</sup> Ibid p49

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

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

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

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

Yours sincerely,



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





Electoral registers, 1 December 2015: Local government electors

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

