

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.