LOCAL GOVERNMENT COMMISSION FOR ENGLAND

FINAL RECOMMENDATIONS: ELECTORAL AREAS FOR THE ASSEMBLY OF THE GREATER LONDON AUTHORITY

November 1998
LOCAL GOVERNMENT COMMISSION FOR ENGLAND

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30 November 1998

Dear Secretary of State

Earlier this year, on 8 May, you directed us to submit a report recommending the boundaries of the electoral areas for the Assembly of the Greater London Authority. We commenced this review on 19 May, having regard to the context of the White Paper, A Mayor and Assembly for London, and the direction.

This report contains our final recommendations, which have been prepared in the light of consultation. In conducting our work we have focused on the need to provide equality of representation for London's voters, so far as this is possible given the wide range of electorates across London boroughs. However, we have also had regard to the nature and functions of the Assembly and to existing borough linkages particularly through the various economic and regeneration partnerships which span London.

Two fundamental qualities have underpinned our approach. The first is the openness and transparency of our process. The legislation places a high premium on consultation, which we have observed throughout our deliberations. Unfortunately, despite the extensive publicity, we received a muted response from the general public. This may not be surprising; given that the Greater London Authority has yet to be established, the role and functions of the Assembly and its members are still something of an unknown quantity.

The second is our own political independence. It is clear from a number of the representations we received on our draft recommendations that political groups have, to an extent, appraised different options in terms of their own political advantage. Indeed, in relation to some of our recommendations respondents in favour and against were split along party lines. In evaluating such representations we have deliberately set to one side all arguments which have a political dimension, and have focused on the evidence.

I would like to thank all concerned for taking the time and effort to contribute to our work over the period of the review.

Yours sincerely

PROFESSOR MALCOLM GRANT
Chairman
SUMMARY

On 19 May 1998, we commenced a review of the electoral areas for the Assembly of the Greater London Authority (GLA). We were directed to have regard to the White Paper, *A Mayor and Assembly for London*. This set out a number of criteria, namely that:

- the new Assembly would have 25 members, of which 11 would be elected across London as a whole and 14 from individual electoral areas;
- our task was to consider, in consultation with all the affected interests, how the 14 individual electoral areas should be defined and named, bearing in mind that they should comprise an area no smaller than a whole London borough;
- the electoral areas should comprise contiguous boroughs and could, if we considered it appropriate, link boroughs either side of the River Thames;
- in defining the electoral areas we should bear in mind the need to achieve reasonable electoral equality and to reflect the nature and functions of the new Assembly.

Our final recommendations for the 14 electoral areas are illustrated in Map 1 and detailed in Figure 1 (pages viii and ix). In reaching our final recommendations, we came to a number of key conclusions:

- the principle of electoral equality – ensuring that, as far as possible, a vote cast in one electoral area carries the same weight as a vote cast in another – should be the most important consideration when constructing the electoral areas;
- there was a case for combining similar boroughs in new electoral areas so that differing perspectives on strategic issues could find a voice in the Assembly;
- we should where possible seek to reflect the boundaries of sub-regional partnerships in the new arrangement;
- strategic transport links should not be a major consideration;
- there was no convincing strategic or electoral equality case for combining boroughs either side of the River Thames in the electoral areas (other than at Richmond upon Thames); and
- the boundaries of existing Parliamentary or European constituencies should not be a major consideration when constructing the electoral areas for the Greater London Assembly.

Having completed the review of the electoral areas for the new Assembly and submitted our final recommendations, we have now fulfilled the terms of the Secretary of State’s Direction.

All further correspondence on these recommendations and the matters discussed in this report should be addressed to the Secretary of State for the Environment, Transport and the Regions, at the address below:

London Governance Directorate
Government Office for London
Riverwalk House
157–161 Millbank
London SW1P 4RR

Provisions for the electoral areas of the Assembly will be made in the Bill to establish the new authority. This is expected to be introduced later in this Parliamentary session. The Secretary of State will give full consideration to our final recommendations in preparing those provisions.
### Final Recommendations

<table>
<thead>
<tr>
<th>Name of electoral area</th>
<th>Constituent boroughs</th>
<th>Electorate (1998)</th>
<th>% variance from the average member/elector ratio</th>
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</thead>
<tbody>
<tr>
<td>1 Havering &amp; Redbridge</td>
<td>Havering and Redbridge</td>
<td>355,131</td>
<td>-1%</td>
</tr>
<tr>
<td>2 City &amp; East</td>
<td>Barking &amp; Dagenham, City of London, Newham and Tower Hamlets</td>
<td>390,500</td>
<td>8%</td>
</tr>
<tr>
<td>3 North East</td>
<td>Hackney, Islington and Waltham Forest</td>
<td>392,722</td>
<td>9%</td>
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<tr>
<td>4 Enfield &amp; Haringey</td>
<td>Enfield and Haringey</td>
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<td>-3%</td>
</tr>
<tr>
<td>5 West Central</td>
<td>Hammersmith &amp; Fulham, Kensington &amp; Chelsea and Westminster</td>
<td>340,000</td>
<td>-6%</td>
</tr>
<tr>
<td>6 Barnet &amp; Camden</td>
<td>Barnet and Camden</td>
<td>363,027</td>
<td>1%</td>
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<tr>
<td>7 Brent &amp; Harrow</td>
<td>Brent and Harrow</td>
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</tr>
<tr>
<td>8 Ealing &amp; Hillingdon</td>
<td>Ealing and Hillingdon</td>
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<td>8%</td>
</tr>
<tr>
<td>9 South West</td>
<td>Hounslow, Kingston upon Thames and Richmond upon Thames</td>
<td>383,579</td>
<td>6%</td>
</tr>
<tr>
<td>10 Merton &amp; Wandsworth</td>
<td>Merton and Wandsworth</td>
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<tr>
<td>11 Croydon &amp; Sutton</td>
<td>Croydon and Sutton</td>
<td>358,131</td>
<td>-1%</td>
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<tr>
<td>12 Lambeth &amp; Southwark</td>
<td>Lambeth and Southwark</td>
<td>344,001</td>
<td>-5%</td>
</tr>
<tr>
<td>13 Greenwich &amp; Lewisham</td>
<td>Greenwich and Lewisham</td>
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<td>-9%</td>
</tr>
<tr>
<td>14 Bexley &amp; Bromley</td>
<td>Bexley and Bromley</td>
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<td>9%</td>
</tr>
<tr>
<td><strong>Average size of electoral area</strong></td>
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<td>360,354</td>
<td></td>
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<tr>
<td><strong>Total electorate for London</strong></td>
<td></td>
<td>5,044,962</td>
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*Source: Office for National Statistics*
1. INTRODUCTION

1. In the referendum which was held on 7 May, Londoners voted to create a new strategic authority for the capital, the Greater London Authority (GLA). It will comprise a directly elected Mayor and an elected Assembly.

2. The White Paper, A Mayor and Assembly for London, set out the Government's policy for the composition of the Assembly. It is to have 25 members. Of these, 11 are to be elected across London as a whole; the remaining 14 are each to be elected from individual electoral areas.

The Commission's Task

3. Our task has been to consider, in consultation with all affected interests, how those individual electoral areas should be defined and named. We were required to recommend appropriate arrangements to the Secretary of State for the Environment, Transport and the Regions by 30 November 1998.

4. Our task was triggered by a formal Direction issued to us by the Secretary of State under the Greater London Authority (Referendum) Act 1998. The Direction required us to submit a report showing the electoral areas into which we recommend that Greater London should be divided for the Assembly elections, and the names by which they should each be known. It specified that electoral areas should not comprise an area smaller than a whole London borough, that the total number of electoral areas must be 14, and that there is to be one member per electoral area. As to the 14 electoral areas, paragraph 4.17 of the White Paper observes:

"We expect these to comprise combinations of contiguous boroughs and respect existing borough boundaries. Where the LGC [the Commission] thinks this is appropriate, Islington north and south of the River Thames might be combined. The LGC will also be directed to recommend names for the constituencies. It will be for the LGC to propose the most appropriate groupings of boroughs, bearing in mind the need to achieve reasonable electoral equality – i.e. achieve constituencies covering broadly equal numbers of voters – and to reflect the nature and function of the Assembly."

5. More generally, paragraph 4.11 of the White Paper envisages that Assembly members will need to think and act strategically, looking at London-wide issues in the round and at the long-term interest of the capital. The White Paper envisaged that the role of Assembly members would be to assist in policy development, approve or amend the Mayor's budget, examine London issues, examine the Mayor's strategies and performance, participate in the staff appointments procedure and serve as members of the police and fire authorities. It also envisaged that Assembly members should not duplicate the local representational role already undertaken by local councillors, Members of Parliament and Members of the European Parliament.

6. Our work has related exclusively to the definition of these electoral areas and has not extended to arrangements for election of the Mayor, nor of the 11 other members of the Assembly who are to be elected from across London as a whole.

Our Timetable and Review Process

7. Our work was carried out in a four-stage process in accordance with the provisions of section 8 of the Greater London Authority (Referendum) Act 1998. At the beginning of Stage One we published Guidance setting out our timetable, the review process and our approach to the task. We also undertook a preliminary evaluation of a wide range of the possible combinations of electoral areas available, to allow us to identify those which appeared to provide the most satisfactory outcome in terms of electoral equality. From this evaluation, we produced and published
in our *Guidance* six modelled options intended to focus and promote debate among interested parties. We stressed, however, that our minds were not closed to other possible combinations of London boroughs.

8. We wrote with our *Guidance* to a wide range of interested parties, including:

- London local authorities;
- Members of Parliament and Members of the European Parliament with constituency interests in Greater London;
- the national headquarters of the main political parties; and
- the local authority associations.

9. These and other interested parties were invited to make proposals as to the electoral areas into which Greater London should be divided, and on the names of those areas. Advertisements announcing the start of our work and the availability of the *Guidance* appeared in the press. At the end of Stage One all the representations were made available for inspection at our offices by appointment and a list of respondents was made available on request.

10. *Stage Two* of the review began on 1 July 1998. During this stage we carefully considered all the proposals we had received, and prepared our draft recommendations.

11. *Stage Three* began on 1 September 1998 and ended on the 13 October 1998. This stage involved consultation on the draft recommendations published in our report, *Draft Recommendations: Electoral Areas for the Assembly of the Greater London Authority*. The report was sent to all those who received a copy of the letter announcing the beginning of the review and to those who submitted representations during Stage One. Its availability was published in the local press, and the London boroughs were asked to place copies on deposit for public inspection at their offices. In order to promote the widest possible consultation and public involvement, posters were printed in English and eight ethnic minority languages, and distributed via boroughs to public libraries and community centres. In addition, copies of the report were made available in local libraries, at our offices and on request. As with Stage One, all representations we received were made available for inspection by appointment at our offices at the end of Stage Three, and a list of respondents was made available on request.

12. At *Stage Four*, we carefully considered all the representations received during Stage Three and prepared our final recommendations for the Secretary of State.

13. In reaching conclusions on our final recommendations we have taken into account all representations received during Stage Three in relation to our draft recommendations. Our draft recommendations are detailed at Appendix A.

14. We received a total of 180 representations from interested parties at Stage Three. They included 10 London-wide organisations; 17 London boroughs; three of the four main political parties; and a number of Members of Parliament, Members of the European Parliament, local councillors and members of the public. A summary is at Appendix B.

15. In view of the extensive publicity given to our task, we were disappointed in the low level of response to our draft recommendations. To some extent, this low response rate must reflect a general satisfaction with our proposals. Relatively few of our recommendations proved controversial, even amongst those directly affected by them. As to the broader electorate, there is inevitably only limited interest in the ground rules for elections to a body which does not yet exist, whose relative power is not yet easy to define, and whose political balance is to be tempered by the proportional representation arrangements involving the 11 additional members.

16. Some respondents implied a belief that the formation of new electoral areas for the Assembly had some wider administrative significance; for example, that it would alter working relationships between existing organisations, especially those straddling the new electoral boundaries. It is important to stress the specific nature of our remit — to recommend the 14 electoral areas for the Assembly of the Greater London Authority and their names — and to correct any misapprehension that our recommendations involve changing any other organisational arrangements.

17. In our draft recommendations report, we outlined a number of principles that we had adopted when constructing electoral areas for the Greater London Assembly and we explained how we had arrived at them. Both the principles and the reasons found broad support amongst those responding, though inevitably with different views as to the weight that should be attached to them.

**Electoral Equality**

18. Our primary consideration in determining the pattern of electoral areas is the achievement of a reasonable level of electoral equality. The London boroughs vary significantly in size of electorate (as detailed in Figure 2 at Appendix A) and it is possible to combine them in several different ways to produce the required 14 electoral areas, each with different implications for the level of electoral balance. However, we did not consider that the size of these building blocks was sufficient reason in itself to accept higher levels of imbalance than might otherwise be achieved.

19. Nevertheless, we recognised that, for a number of reasons, our work could not be a purely arithmetical exercise. We concluded that we should not simply pursue the lowest level of electoral imbalance at the expense of other considerations and we looked for an acceptable balance. In the event, our draft recommendations provided all 14 electoral areas with variances of no greater than 9 per cent from the London-wide average.

20. At *Stage Three*, there was broad agreement with our objectives, but several respondents argued for greater weight to be attached to other factors. The Greater London Regional Office of the Labour Party (the Labour Party) argued that the pursuit of electoral equality should be tempered by the need to secure accessibility to the electorate and administrative convenience. Others, such as the Greater London Group of the Royal Institution of Chartered Surveyors and the London Region of English Partnerships argued for greater weight to be accorded to other considerations, such as combining similar areas and reflecting sub-regional partnerships and regeneration issues.

21. Some respondents, however, argued for greater emphasis to be given to the achievement of electoral equality in particular electoral areas. Hammesmith & Fulham Conservative Association
and the Fulham Society argued that one reason why the City of London should be combined with Westminster, Kensington & Chelsea and Hammersmith & Fulham rather than Tower Hamlets, Newham and Barking & Dagenham is that electoral equality would be improved by between 1 and 2 per cent in each electoral area. Similarly, the London Federation of Green Parties (the Green Party) argued that linking Harrow with Hillingdon and Ealing with Brent, rather than Brent with Harrow and Ealing with Hillingdon, would improve the level of electoral equality in each of the electoral areas by around 2 per cent.

We have looked carefully at this issue again in the light of representations. We believe that we were right to make electoral equality our main but not sole objective, and to allow some flexibility so as to reflect the strategic character of the Assembly. It is for this reason that we felt justified in putting forward a pattern of areas which did not necessarily produce the lowest level of electoral imbalance. Having considered the representations received during Stage Three, we feel confirmed in our general approach.

Borough Linkages

23 The argument was put to us at Stage One that wherever possible the electoral areas should reflect the existing links and partnerships between London boroughs. In principle, we agreed: we considered that there was a strong case for taking account of sub-regional partnerships which transcend borough boundaries, and of the existing patterns of connectivity, and of the interest of boroughs, and of the existence of strategic linkages of potential significance to the Assembly. Equally, however, we recognised that most boroughs have some links and partnerships with all of their neighbours and that, given the multiplicity of partnerships and other initiatives across London, it would be impractical to expect any pattern of electoral areas to reflect all the sub-regions and partnerships which currently exist. We considered that strategic transport links should have only a marginal effect on our considerations as, for the most part, the London boroughs are well linked by trunk roads, and there are very few areas which are not easily accessible from neighbouring boroughs. We accepted, however, that where there are few or no transport links, the case for combining adjoining boroughs was less strong.

24 One of the key issues raised in the first stage of the review was whether the electoral areas should combine broadly similar or diverse areas. We concluded that while electoral areas which combined diverse boroughs could enable individual Assembly members to benefit from receiving a wide range of different, possibly conflicting, views on the governance of London, it would be difficult for them to reflect the disparate interests of, and demonstrate accountability to, their constituents. We also considered that combining diverse areas could lead to a sense of disadvantaged Assembly members being perceived as being unrepresentative of a significant proportion of the electorate within individual electoral areas. While we recognised that, to varying extents, all London boroughs are interlinked and interdependent (as we concluded that where there was a choice, and it would not lead to a significant deterioration in electoral equality, there was a case for seeking to combine boroughs with similar overall perspectives in creating the electoral areas for the Assembly.

25 Support for this general approach came from many respondents. Some wished to emphasise particular elements of diversity or commonality between particular boroughs. The Greater London Group of the Royal Institution of Chartered Surveyors commented that “the combination of diverse boroughs within an electoral area is not appropriate for the GLA [Greater London Authority], as it would then be difficult for Assembly members to have a reasonably clear idea of the economic groups and geographical areas they are representing”. It argued that where possible outer boroughs should be paired together as well as inner ones, as they often display mutual interests and economic links. London Says No, an organisation representing those opposed to the formation of a Greater London Authority, argued that the size of an electoral area was less relevant than its make-up and its natural boundaries. It considered that similar communities should be kept together wherever possible, pointed out that this meant inner and outer London should remain separate. English Partnerships, on the other hand, argued for an alternative configuration to better reflect sub-regional partnerships and regeneration issues.

26 The London and South Region of the Commission for Racial Equality was concerned that the interests of London’s ethnic minority communities should be fairly represented in any new electoral areas, and advocated that this could be best achieved by combining boroughs with high ethnic minority populations. It particularly cited Hounslow as having a high ethnic minority population as against Kingston upon Thames and Richmond upon Thames which have low ethnic minority populations, and considered that a more appropriate arrangement would be to combine Hounslow with Hillingdon. The London Borough of Hounslow also considered that it should not be combined with Kingston upon Thames and Richmond upon Thames as they were both boroughs with which it had “little or no affinity or relationship”. Richmond upon Thames argued that it should be combined with Kingston upon Thames and Sutton to reflect economic similarity and development factors.

27 Westminster Council regarded the regeneration of East London as a matter for the Greater London Assembly but “not a valid basis for determining the electoral areas”. It expressed the view that commonality between areas should be the most important consideration after electoral equality. Hammersmith & Fulham questioned the extent to which it was similar to Westminster and Kensington & Chelsea, while the Fulham Society considered such a combination to be “a wholly logical grouping of boroughs, which have much closer affinity of interest than with our neighbouring boroughs to the north and west, as well as across the river”.

28 A number of representations argued that strategic transport links should be taken into account in the formation of electoral areas. For instance, the London, Ealing and Conservative Group argued that Ealing and Hillingdon are linked by the A4020 and the A40, as well as by railway services from London Paddington. Similarly, the London Borough of Hounslow argued that it should be linked with Hillingdon as it shared the M4, A4 and Becckily Lane. Similarly, Enfield argued that its north-south transport links supported its combination with Haringey, while Waltham Forest Conservative Group argued that the A406 (North Circular Road) links Enfield with Waltham Forest. Transport links were also invoked to support arguments for differing combinations of boroughs in South East London.

29 We confirm our preference for building upon borough linkages and similarities in reaching conclusions of the Assembly’s electoral areas while recognising that the electoral areas are intended to pass the test of time. We have therefore sought to reflect those linkages which have a degree of longevity and, so far as economic and regeneration partnerships are concerned, are of a strategic, as opposed to purely service delivery, nature. However, as previously indicated, given their number and diversity it would be impractical to seek to reflect all such linkages in our work. Nor did we consider it appropriate to adopt a simple rule of linking only inner boroughs or outer borough, which would not necessarily reflect the quality we were seeking. We have therefore sought to strike a balance, having regard to the need to achieve a reasonable level of electoral equality.

30 In striking that balance, we recognise that in some parts of London there may be perceived advantages in slightly different borough pairings from those set out in our draft recommendations. However, we must take note that our task is to construct a pattern of electoral areas for London as a whole, and we must consider the consequent effect of any alternative borough groupings. These include whether, because of particular synergies or similarities between boroughs, an alternative grouping in one part of London would lead to weaker pairings of boroughs and a less satisfactory pattern of electoral areas overall.

31 London is a multi-cultural city with a complex distribution of ethnic minorities across many areas, and we share the concern of the Commission for Racial Equality that the interests of ethnic minorities should be adequately represented in the Assembly of the Greater London Authority. However, we have come to the view that attempting to achieve this through constituency representation is impracticable, given the other considerations that we are required to take into account. We believe, however, that it will be appropriate for the political parties, when finalising their lists of candidates for the 11 additional members of the Assembly, to bear in mind the desirability of ensuring that the Assembly reflects the multi-cultural make-up of its electorate.

32 The divergent views we received at Stage Three in relation to strategic transport links do not undermine the conclusions on this issue that we reached in our draft recommendations. We continue to consider that this issue should have only a marginal effect on our considerations as, for the most part, the London boroughs are well linked by trunk roads and that there are very few adjoining boroughs which do not have reasonable access to each other.

Physical Barriers

In our draft recommendations report, we considered whether there were any significant physical barriers that should be respected when
constructing electoral areas for the Greater London Authority. We concluded that there was no
convincing case in electoral equality or strategic terms for combining areas either side of the River
Thames, except in the case of Richmond upon Thames which is already divided by the river albeit
at its narrowest point in London. In each of the areas where cross-river options were proposed to us
at Stage One, there were alternative options, providing better electoral equality, and options
which garnered more local support from the areas concerned. We considered that, to varying degrees
along its length, the river acts as a physical and psychological barrier and that we should not
therefore combine areas either side of it.

34. We considered that, at its northern extent, where it is abutted by reservoirs and marinas, the
River Lee (and Lee Valley) acted as a significant boundary both physically and in community terms.
We noted that, in the north, the Lee Valley is wider than many stretches of the River Thames and
that there is a sparsity of vehicular crossing points, thereby restricting east-west movement.

35. There was broad support at Stage Three for respecting the River Thames as a barrier other than
at Richmond upon Thames, and we received no submissions proposing the combination of other
boroughs either side of the River Thames in an electoral area. We have therefore decided to
confirm our view that, other than at Richmond upon Thames, areas either side of the River Thames
should not be combined to form electoral areas. There was, however, no consensus over the
degree to which the River Lee acts as a physical barrier between boroughs in the north and east of
London. Similarly, in South East London, some submissions argued that the A20 trunk road acts as
a significant physical barrier between Bexley and Bromley and that this should also be respected when
constructing electoral areas in this part of London. These issues are discussed in more detail in
the following chapter.

Administrative Convenience

36. In our draft recommendations we concluded that the division of some Parliamentary
constituencies was unavoidable, bearing in mind that the Secretary of State’s Direction requires us to
use borough areas as the building blocks for electoral areas. We considered that, while the new
Assembly members would be required to work closely with elected representatives, the limited
overlapping of boundaries would not have

3. THE COMMISSION’S ANALYSIS AND
FINAL RECOMMENDATIONS

Electoral Areas

40. We gave further consideration to all of the proposed electoral areas in the light of
representations received at Stage Three. The proposed combinations of Havering with Redbridge, Lambeth with Southwark, Croydon with Sutton, and Merton with Wandsworth
attracted relatively few responses and no significant new evidence. We have therefore decided to
confirm our draft recommendations for these areas as final.

41. However, issues were raised in relation to the
whole or part of the remaining 10 electoral areas
which warranted further consideration. The views
expressed in relation to those areas, and our
conclusions, are set out below.

North London

42. We received differing views as to the
most appropriate arrangements for North London.
In our draft recommendations, we proposed
that Barnet be combined with Camden, Enfield
with Haringey, and Islington with Hackney
and Waltham Forest. Central to our draft
recommendations in this area was the Upper
Lee Valley, which we considered acted as a significant
physical boundary at its northern extent and we
concluded should be respected when constructing
electoral areas.

43. The Greater London Regional Office of the
Labour Party (the Labour Party) was in full
agreement with our draft recommendations for
North London which, it argued, would form robust,
well-shaped constituencies. It also welcomed the
recognition of the Upper Lee Valley as a barrier.
Barnet Labour Group also supported our draft
recommendations in its area. It argued that
combining Barnet with Camden would create an
undesirable area which would provide reasonable
electoral equality and reflect strategic transport links.

44. The London Federation of Green Parties (the
Green Party) argued that “the River Lee poses as
much of a physical barrier to residents in north-east
London as does the Thames to the central and east
London boroughs” and concluded that as a consequence it was necessary to link Barnet with
Camden, Enfield with Haringey and Islington with
Hackney and Waltham Forest. It did, however,
recognise that, by necessity, the three electoral
areas would contain a wide diversity of communities.

45. The London Region Office of the
Conservative Party (the Conservative Party),
however, felt that we should not regard the Upper
River Lee as a physical barrier. It argued that “the
economic importance of the Lee Valley Partnership
seems to have been disregarded on the basis that
the Lee Valley operates as a natural boundary
between Enfield and Waltham Forest. The need for
co-operation between Enfield and Waltham Forest
in this partnership is to achieve its full potential
should not have been overridden by geographical
factors when the very nature of the regeneration
project requires this geographical boundary to be
transcended.” It argued that we had accepted the
desirability for outer borough and inner boroughs
to be grouped together for South London but had
deviated from this approach in North London for
reasons that did not appear to be sustainable. In
particular, it reiterated its preference for Enfield to
be combined with Waltham Forest, and cited the
need for the two authorities to co-operate over the
development of transport links, which it conceded
are currently limited.

46. This view was supported by Waltham Forest
Conservative Group which advocated that the
borough should be combined with Enfield on the
grounds of the regeneration factors relating to the
Lee Valley. It stated that whereas Enfield, Hackney,
Haringey, Newham, Tower Hamlets and Waltham
Forest had formed the London Lee Valley Partnership in 1993, Islington has never been
involved. In addition, it said that Waltham Forest
had strategic transport links with Enfield but not
with Islington. Enfield Conservative Group argued
that for reasons of electoral equality, and in order to
reflect the strategic transport and regeneration links
in the area, it favoured a link with Waltham Forest.

Electoral Advantage

47. We are aware that the approach of several
respondents was fashioned to a greater or lesser
extent by calculations of political advantage. Indeed,
we received a letter distributed by a
constituency party urging its members to write in
support of a particular option which they felt
would give them greater advantage than the
alternative proposed. Respondents are entitled to
take such considerations into account. We are not.
It argued that the River Lee is traversed by good road links and contrasted our approach in this area with Richmond upon Thames where we propose combining areas either side of the river.

46 Conversely, the London Borough of Enfield, supported being paired with Haringey. It considered that the two boroughs share an affinity and that this was demonstrated by the outward migration of residents from Haringey to Enfield. It considered that the two boroughs share north-south transport links and commented that "the River Lea and the reservoirs and marshes create a natural physical barrier between Enfield and Waltham Forest, while in contrast there was no natural boundary with Haringey." Hackney and Waltham Forest supported our draft recommendation for their area. Hackney commented that its combination with Islington and Waltham Forest would "maintain the existing cross-borough strategic links between the three boroughs, the primary focus for partnership working currently being the London Lee Valley Partnership (with Waltham Forest) and City Fringe Partnership (with Islington)."

47 Three Members of Parliament also expressed views during Stage Three. Stephen Twigg MP (Enfield Southgate) and Andrew Love MP (Edmonton) supported our draft recommendations for the linking of Enfield and Haringey in an electoral area. Mr Twigg argued that "it makes sense for Enfield and Haringey to be grouped together as there is already a strong existing pattern of joint work and co-operation between the two". Andrew Dismore MP (Hendon) supported the linking of Barnet and Camden boroughs on the grounds that they have strategic transport routes linking them, and that "these links will generate issues of strategic importance which will become an integral part of the work of the GLA [Greater London Authority]."

48 We also received representations from London-wide and local groups. The London Region of English Partnerships argued that Waltham Forest should be combined with Redbridge, Enfield with Barnet, Haringey with Camden and Islington, and Hackney with Tower Hamlets, Newham and the City of London. It argued that these combinations would better reflect sub-regional partnerships and regeneration areas. Middlesex Probation Service argued that linking Enfield and Haringey made "excellent sense" on the grounds that there are a number of service providing organisations which make a similar link. It had reservations over the linkages between Barnet and Camden, but recognised that this option enables "the strong pairings" to the east and west of it.

50 Finsbury Park Area Joint Working Party argued that it was important for Finsbury Park to be contained within one electoral area so that the area would have one Assembly representative. It argued that Haringey shares many more characteristics with Hackney and Islington than it does with Enfield, and that the boundary effect created by the Upper Lee Valley has been exaggerated. It said the Upper Lee Valley was crossed by two railway lines and the Victoria line. It argued that if the Upper Lee Valley is considered as a physical barrier, we are then obliged to combine diverse areas such as Islington and Waltham Forest, and Camden and Barnet. Its views were endorsed by Finsbury Park Action Group. The SUMGE community group, on the other hand, argued that Camden and Islington share the Kings Cross development and a health authority; in addition to a common boundary.

51 In the light of the representations received, we have reconsidered the pattern of electoral areas in North London. We recognise that, by reflecting the physical barrier of the Upper Lee Valley, our draft recommendations combined areas that have a greater degree of diversity than in other parts of London. We also recognise that by dividing the Lee Valley Partnership area between electoral areas we are not reflecting these strategic links. However, the Lee Valley Partnership covers such a large part of North and North East London that given the geography of this area, and the need to achieve a reasonable level of electoral equality, it is inevitable that it would be divided between electoral areas. In addition, we have received evidence at Stage Three to suggest that our draft recommendations will reflect a number of the strategic links in North London and have a degree of local support. We continue to consider that the River Lee (and the Lee Valley) area as a significant barrier at its northern extent and believe that this should be reflected in the pattern of electoral areas. We have concluded that, on balance, our draft recommendations provide the best available arrangement for this area.

West and South West London

52 We received differing views as to the most appropriate pattern of electoral areas in West and South West London. In our draft recommendations, we proposed that Brent should be combined with Harrow, Ealing with Hillingdon, Hounslow with Kingston upon Thames and Richmond upon Thames, and Hammersmith & Fulham with Kensington & Chelsea and Westminster.

53 The views of the political parties were mixed. The Labour Party reiterated its preference for Hammersmith & Fulham to be combined with Ealing, and for Hounslow to be combined with Hillingdon. However, it supported the combination of Brent and Harrow. The Conservative Party supported our draft recommendations for West and South West London in their entirety. The Green Party argued that we should revise our draft recommendations to create electoral areas containing similar communities. It argued that Hillingdon should be linked with Harrow, and that Ealing should be linked with Brent, rather than Brent with Harrow and Ealing with Hillingdon. It stated that our draft recommendations would "create diverse, finger-like constituencies reaching from the Green Belt to the heart of London".

54 The London & South Region of the Commission for Racial Equality was concerned that the interests of London's ethnic minority communities should be fairly represented in any new electoral areas, and argued that the best method of achieving this was to combine boroughs which have high ethnic minority populations. It particularly cited Hounslow as having a high ethnic minority population, as against Kingston upon Thames and Richmond upon Thames which have low ethnic minority populations, and considered that a more appropriate arrangement would be to combine Hounslow with Hillingdon. It supported our draft recommendation to combine Brent with Harrow, and considered the links between the two boroughs, but commented that we might also wish to consider whether Ealing should be combined with Hammersmith & Fulham.

55 The London Region of English Partnerships appreciated that the draft recommendations were intended to provide electoral areas with similar electorates, but argued for a number of changes to reflect sub-regional partnerships and regeneration factors. In West London, English Partnerships preferred linking Brent with Ealing on the basis that both boroughs are covered by the Park Royal sub-regional partnership, and therefore, proposed that Harrow be combined with Hillingdon to enable such a link. It supported our draft recommendations for Hammersmith & Fulham being combined with Kensington & Chelsea and Westminster, and Hounslow being combined with Kingston upon Thames and Richmond upon Thames.

56 Ealing, Hammersmith & Hounslow Health Authority expressed a preference for Ealing being linked with Hammersmith & Fulham, and Hounslow with Hillingdon. It argued that such a combination would better reflect strategic, including transport, links. Furthermore, it considered that Hounslow had little or no affinity with boroughs to its south and that such a combination would not take account of the impact of Heathrow Airport.

57 Middlesex Probation Service considered that linking Brent and Harrow would reflect existing co-operation between the two boroughs, notwithstanding their demographic differences. It regarded the combination of Ealing with Hillingdon "in a sound link", and acknowledged that Hounslow could be combined with Kingston upon Thames and Richmond upon Thames, although it also had strong connections with Ealing.

58 Submissions from Brent were generally supportive of our draft recommendations. Brent Council, Brent & Harrow Co-operative Party, Brent Labour Party, Brent East Labour Party, Brent Conservative Group, Brent North Conservative Association and two local branches of the Labour Party all supported the linking of Brent with Harrow. Brent Labour Party commented that there are close working arrangements between the two boroughs, with both local authorities signing a joint health authority, working together through a joint trading standards consortium, and sharing business links such as the North West London TEC, Business Link North West and the North West London Chamber of Commerce.

59 The London Borough of Hounslow stated that it was very disappointed at its preference for combining with Hillingdon, which has been ignored, commenting that "Hounslow has little or no affinity or relationship" with Kingston upon Thames and Richmond upon Thames. It argued that Heathrow Airport, while in Hounslow, "has a significant impact on Hounslow and gives rise to a number of planning, transport, economic and environment issues which are of interest and concern to both boroughs", which has been an important employment source. It stated that Hounslow shares important partnerships with Hillingdon and Richmond upon Thames such as...
West London Training & Enterprise Council, West London Leadership and West London Waste Authority but does not share any such relationship with Kingston. In addition, it argued that Hounslow and Hillingdon share a similar population mix with a significant incidence of ethnic minority groups; this factor distinguishes them from both Kingston upon Thames and Richmond upon Thames and "introduces important cultural, economic, social and educational differences" between the areas.

64 Richmond upon Thames considered that our arguments opposing cross-river combinations should equally be applied to combining Richmond upon Thames with boroughs on either side of the River Thames. It further argued that in terms of socio-economic similarity and economic development factors, it should be combined with Kingston upon Thames and Sutton, and not Kingston upon Thames and Hounslow. Kingston upon Thames stated that in Policy and Resources Committee "did not wish to put forward any formal view on the proposed combination of Kingston, Hounslow and Richmond in a single GLA [Greater London Authority] electoral area".

65 Hammersmith & Fulham supported our view that similar rather than diverse boroughs should be grouped, but questioned the extent to which this would be achieved by combining it with Westminster and Kensington & Chelsea. It considered that it shared partnerships with other West London boroughs, particularly through the West London Alliance, and that linking the borough with Central London boroughs would damage this work. It added that a link with Ealing would help to reinforce the recently formed Ealing, Acton & Shepherds Bush Parliamentary constituency. In relation to electoral equality, Hammersmith & Fulham argued that "the voting public will be much more concerned to achieve GLA [Greater London Authority] constituencies that help achieve the strategic aims of the new authority, in terms of jobs, transport, and a vibrant capital city, than in arithmetic issues of electoral equality".

66 Hillingdon Conservative Group, Ealing Conservative Group, Ealing, Acton & Shepherds Bush Conservative Association and a number of residents of Ealing & West Ealing being linked with Hillingdon on the basis that the two boroughs are linked by the A4020, the A40 and the rail services from London Paddington, and also have employment links. The Hammersmith & Fulham Conservative Group, Hammersmith & Fulham Conservativ Association and the Fulham Society all supported Hammersmith & Fulham being combined with Kensington & Chelsea and Westminster. The Fulham Society argued that such a combination was wholly logical and would reflect the close affinity between the two boroughs. Hammersmith Conservative Group, Richmond upon Thames Conservativ Group and Twickenham Conservativ Association all supported our draft recommendation for combining Hounslow, Kingston upon Thames and Richmond upon Thames.

67 We have reconsidered our draft recommendations for West and South West London in the light of representations received at Stage Three. We remain of the view that combining Brent and Harrow would provide a reasonable level of electoral equality and reflect strategic links and working relationships. We received significant evidence of similarities and strategic linkages between Hounslow and Hillingdon at Stage Three, and recognise the role played by Heathrow Airport in this part of London. Indeed, until 1994, Heathrow Airport spanned the boundaries of the two boroughs. However, Heathrow Airport is not merely of local significance but regional, and has an impact on an area considerably wider than Hillingdon and Hounslow. It is also the case that Richmond upon Thames shares strategic links with Hounslow and similarities with Kingston upon Thames. We acknowledge the desire of Hammersmith & Fulham to be combined with Ealing to reflect its partnerships with West London Alliance, but also note that the borough has some similarities and shared interests with the boroughs to its east.

68 Combining Hounslow with Hillingdon, and Hammersmith & Fulham with Ealing, would create electoral areas with acceptable levels of electoral equality (10 per cent and 7 per cent fewer than average respectively). It would also offer an accountable strategic alignment of boroughs not dissimilar in size. It is possible that this new configuration cannot be considered in isolation. As explained in paragraph 30 in the previous section, our task is to construct a pattern of electoral areas for London at a whole, and we must consider the wider consequential effect of any alternative borough groupings.

69 We were to adopt such alternative combinations in order to achieve reasonable levels of electoral equality across London as a whole the electoral areas of Croydon & Sutton, and Merton & Wandsworth would need to be reconfigured, with Wandsworth (or other South London boroughs) being linked with boroughs north of the River Thames. However, as indicated in paragraph 40, we believe that the balance of evidence supports confirming our draft recommendations for these areas. The alternative would be to accept considerable levels of electoral inequality in electoral areas which combined only Richmond upon Thames and Kingston upon Thames, and Kensington & Chelsea and Westminster (with or without the City of London). Moving away from our draft recommendations in our view, would lead to weaker pairings of boroughs beyond West London and a less satisfactory pattern of electoral areas overall, or would lead to considerable levels of electoral inequality. Neither is acceptable to us.

70 We have therefore decided to confirm our draft recommendations for West and South West London on the basis that they represent the best balance which can reasonably be achieved between the need for electoral equality across Greater London as a whole, reflecting similarities, strategic links and physical barriers.

City of London

71 In our draft recommendations, we acknowledged that in many ways the City of London differs from the London boroughs, and that this had presented us with a particular dilemma. Because of its low resident electorate, the City of London could be combined with boroughs to its north, south, east or west with very little impact on the level of electoral equality. At Stage One, five borough council—Kensington & Chelsea, Lambeth, Newham, Tower Hamlets and Westminster—all argued that the City of London should be combined with the City of London. The London Borough of Lambeth, for example, cited its travel to work links and initiatives such as the Cross-River Partnership which it shares with the City of London, Newham argued that the City of London was a natural partner in the regeneration of East London; and Westminster that the City of London is linked with it for Parliamentary purposes. The Corporation of London expressed no view, but it did tell us, for example, in response to a public meeting or responding in writing, the majority had expressed a preference for the City to combine with Westminster to its west.

72 We recognised in our draft recommendations that in terms of the character of the residential areas, the City of London probably has more in common with the boroughs to its west. However, we felt that the issue of similarity should be considered in its broader terms to take into account the similarities between the City of London and the more commercial sector in Docklands. We also noted the links with Westminster for Parliamentary purposes but considered that Parliamentary constituency boundaries should not be a major consideration for us. Nor were we persuaded that we should combine areas either side of the River Thames, as suggested by Lambeth. We took the view that the City of London acts as a significant partner in the regeneration of East London and put forward its combination with Barking & Dagenham, Newham and Tower Hamlets as our draft recommendation.

73 At Stage Three the Corporation of London chose to express no view on our recommendation, but it drew our attention again to the views of those residents who had expressed a preference for the City of London to be linked with Westminster to the west. However, Barking & Dagenham, Newham and Tower Hamlets councils all supported our draft recommendation. Newham, in particular, argued that the recommendation recognised that the Assembly should support the capacity for strategic thinking and underpin the achievement of London-wide objectives. Barking & Dagenham argued that "the inclusion of the City as a member of the group is considered to be of paramount importance as this will give East London supporting strength to achieve their aims".

74 Westminster welcomed its grouping with Kensington & Chelsea and Hammersmith & Fulham, but thought that the City of London should also form part of that electoral area. Its principal arguments were that such a grouping would provide greater electoral equality than our draft recommendation, and would reflect the greater commonality between Westminster and the City of London and the current Parliamentary boundaries which link the two. It considered that in setting electoral boundaries we should not be influenced by policy issues such as the regeneration of East London. This is a matter for the GLA [Greater London Authority] as a whole and the boroughs and is not a valid basis for determining the electoral area and who should represent it.

75 Kensington & Chelsea and the Cities of London & Westminster Conservative Association echoed those arguments, stating that combining the City of London with boroughs to its east would have an adverse effect on electoral equality.
and would divide the Cities of London & Westminster Parliamentary constituency. The Westminster Society considered it was unacceptable to separate the City of London from Westminster both on “historical... and on functional grounds, since it is not just in terms of the residential characteristics that the two cities have much in common but also in terms of commercial activity and development and planning issues”. English Heritage, London Region stated that it was sceptical as to the degree to which the City of London had sufficient common interests with Barking & Dagenham, Newham, and Waltham森林 to warrant its inclusion in an electoral area with them. It argued that our draft recommendation ignored the poverty and deprivation of the East London boroughs and “the international importance of the City of London as a world financial centre, its obvious synergies with other Central London boroughs such as the City of Westminster, and its high level specialist business functions”. In planning terms, it commented that the City of London is a key component in the strategic planning and transportation policies of central London, while it is excluded from the Thames Gateway Regional Planning Area.

73 We received views directly from only three City of London residents at Stage Three; two preferred a westward link and one supported our draft recommendation. The two residents in favour of linking the City of London with Westminster argued that the areas are similar and compatible, and that we should reflect the views of those residents who had expressed a preference during the earlier stage of our work. The resident preferring a link with boroughs to the east argued that the goal of cohesion and community for London would be best achieved by reducing social division, and that linking the City of London as the richest local authority with Tower Hamlets as the poorest would help achieve this. He also argued that currently there is “an unhealthy and dysfunctional competitiveness between the Corporation of London and Docklands for the location of major financial institutions... and the Commission’s proposals will go some significant way to ensuring that these are reduced”.

74 We note the references by some respondents to the historic and Parliamentary links between the City of London and Westminster. However, we feel these may be misplaced. Indeed, the City of London only became linked with Westminster for Parliamentary purposes in 1950, prior to the 1950 General Election the City of London returned two Members of Parliament from within its own boundaries. We are not persuaded that the boundaries of Parliamentary constituencies should be a major factor in determining our recommendations. Similarly, we are less concerned with historic associations between boroughs than with contemporary links and partnerships, and how they may contribute to the future regeneration of London.

75 A number of respondents have drawn our attention to the many characteristics the City of London shares with Westminster. While acknowledging that the City of London does have synergies with Westminster, we do not subscribe to the view that it has nothing in common with the less affluent boroughs to its east. Nor does it have a homogenous electorate. As with every other local authority in London, the City of London contains a diverse community. Indeed, some 30 per cent of the City of London’s housing stock is social housing, a figure marginally above the average for Greater London as a whole.

76 We consider that in recent years there has been an increase in links and similarity, in its broadest sense, between the City of London and areas to its east, particularly Docklands where there has been extensive commercial redevelopment. The City of London is a major influence in the regeneration of East London, and we believe that there is merit in a single Assembly member representing both the City of London and the areas undergoing regeneration to its east.

77 We accept that a better level of electoral equality could be achieved by pairing the City of London with boroughs to its west. However, as elsewhere in London, we have sought to temper the achievement of electoral equality by taking account of other relevant factors, in this case the strategic regeneration and growing commercial importance of East London. Accordingly, having considered all the other evidence submitted to us, we reaffirm our view that the City of London should be grouped in an electoral area with Tower Hamlets, Newham and Barking & Dagenham to its east.

South East London

78 A particular area of contention at Stage Three was our draft recommendations for electoral areas in South East London, where we had proposed to combine Bexley with Bromley and Greenwich with Lewisham. Some 30 per cent of all Stage Three representations related to this area.

79 At Stage One, views on the appropriate combination of boroughs in this area had been mixed. The Liberal Democrats, the Green Party and the Conservative Party had all proposed that Greenwich be combined with Lewisham and Bexley with Bromley, while the Labour Party had argued that Greenwich should be combined with Bexley and Lewisham with Lewisham. Labour Party’s preferences tended to look to the Central London for employment, Bromley for shopping and Greenwich for leisure, and that in this sense it had no natural partner. It considered that if existing east and west partnerships were considered, it had few with Bromley, but more with Southwark and Greenwich. It concluded that its shared inner-London status and Millennium-based partnerships with Greenwich made Greenwich the most obvious partner borough. Greenwich, on the other hand, considered that it should be paired with Bexley on the grounds that this would reflect Parliamentary and partnership boundaries. It argued that while it shared local issues and had a greater similarity with Lewisham, combining them “would detract from the strategic, London-wide role that the GLA [Greater London Authority] representative will have”. Bromley considered that in electoral equality terms, particularly in relation to transport and regeneration, it should be combined with Bexley.

80 At Stage Three, the Labour Party stated that it was “seriously concerned” about the draft recommendations for South East London. In particular, it argued that Bexley and Greenwich should form as electoral area on the grounds that they have a long, ill-defined common boundary and numerous transport links, and “as part of the Thames Gateway, an electoral area comprised of these boroughs would reflect the City & London East electoral area north of the river”. It contrasted this with Bexley and Bromley boroughs, which it commented were “divided by the A20 dual carriageway and have a somewhat shorter common boundary. The Green Party and the Conservative Party expressed support for the recommendations for South London in their entirety.

81 Of the four borough councils concerned, only Greenwich responded at Stage Three, although representations were also separately made by several of the constituency political parties and borough political groups in all four boroughs concerned. The Council considered that its combination with Bexley would form a much more natural electoral area than combining it with Lewisham. It argued that this was most appropriate with regard to the development of Thamesmead, which is divided between Greenwich and Bexley, and also because the boroughs are linked through Parliamentary constituencies, the Greenwich & Bexley Health Authority, Bexley & Greenwich Chamber of Commerce, the Thames Gateway London Partnership and the South London Business Leadership Partnership. Greenwich noted that while Lewisham was also a partner in the Thames Gateway initiative, it was considered to be on the fringe of that Partnership. Greenwich also commented that Lewisham had indicated that it was considering leaving the Thames Gateway initiative.

82 Greenwich & Woolwich Conservative Association supported the pairing of Greenwich with Lewisham on the grounds that the two boroughs have similar levels of deprivation, a similar percentage of households in local authority housing, similar numbers of new claims for council tax benefit and a similar percentage of households without car. It contrasted these similarities with the more affluent Bexley which showed lower levels of deprivation. The Association concluded that “the often conflicting requirements of disparate boroughs would tend to create contradictions which could dilute and reduce the effectiveness of campaigning and policy making, whereas the combination of two similar boroughs with similar needs would tend to reduce the likelihood of conflicting requirements”. Orpington Constituency Labour Party argued for pairing Bexley with Lewisham rather than with Bexley because it would create a much more socially diverse electoral area with “a richer ethnic and social class mix”. It considered that any new Assembly member should be exposed to as wide a range of influences as possible.

83 A number of respondents cited the division of the Thamesmead community between Bexley and Greenwich as a reason for combining the two boroughs in an electoral area. John Austin MP (Erith & Thamesmead) stated that the division of Thamesmead between the two boroughs “had caused a number of difficulties in the past and confusion for the local population”. He said that Thamesmead Town Centre is a large undeveloped land and industrial estate, and that residents from each borough elect some of its directors. He also said that in its review of Parliamentary boundaries in 1994, the Boundary
Commission had acknowledged the desirability of the two parts of the town being in one Parliamentary constituency and had combined them to form the Erith & Thamesmead seat. Thamesmead Family Service Unit argued that it already had to deal with two local authorities, Bexley and Greenwich, when dealing with issues relating to the town, and that the town's strategic development would be enhanced by its inclusion in one electoral area. It considered that its work would become more difficult were the number of partners to increase. Canon Chris Byers, the Anglican Rector of Thamesmead responding on behalf of all churches in the town expressed the view that combining Bexley with Bromley would divide the community into two and would "make it even harder for those of us who work here to bring cohesion and a sense of identity to a community that will eventually number 40,000 people".

We also received representations from a number of other communities in South East London which are divided between boroughs. A number of residents highlighted the issue of Blackheath, which is divided between Lewisham and Greenwich and is the starting point of the A2 trunk road crossing the heath. It was argued that as a result of this division the two boroughs shared common interests such as the management of the heath, local amenities such as the Blackheath Concert Halls and traffic and parking problems related to the A2 trunk road. A number also considered that Blackheath has greater links with Lewisham as it acts as the main shopping and public transport centre for the area. Similarly, Richard Balfe MEP (London South Inner) said that the community of Downham is divided between the boroughs of Bromley and Lewisham, and argued that the "community of Downham [in Lewisham] merge seamlessly and over many crossing points with Pege and Beckenham in the London Borough of Bromley".

A number of representations referred to the transport links between the boroughs in South East London. London Transport stated that the public transport circumstances of inner and outer London differ and it would be important for the new Assembly recognise this. It argued that to avoid a polarisation of views on this issue there was a powerful case for an arrangement which connected both inner and outer London boroughs. It therefore concluded that there was a case for combining Bexley with Greenwich and Bromley with Lewisham.

Erith & Thamesmead Constituency Labour Party cited the A206, A207, A2 and A210 trunk roads which, it said, link communities in Greenwich and Bexley as a reason to combine the boroughs in an electoral area, while stating that the A20 "forms an impassable barrier between Bexley and Bromley". Similarly, Greenwich & Woolwich Constituency Labour Party argued that the A2 acts as an important transport route not only linking Bexley and Greenwich "physically, but politically and socially too". They also argued that the A21 links communities in Lewisham and Bromley. However, submissions from residents for whom the A21 was the main access route across service areas such as Plumstead Police Division. Similarly, three members of the London Fire & Civil Defence Authority, councillors for Bromley, Greenwich and Lewisham, argued that Bexley and Greenwich share a common interest in emergency planning, and that fire service areas would more closely match the pairing of Bromley with Lewisham and Bexley with Greenwich. They therefore considered that the combination of Bexley with Greenwich and Bromley with Lewisham would ensure better accountability of fire service and emergency planning.

In the light of responses received at Stage Three, we have given further consideration to our draft recommendations for South East London. We are aware that different combinations of boroughs could provide different political representation for the area, and recognise that this may be one of the reasons that we received a significantly higher number of submissions from these four boroughs than in the rest of London. Certainly, there appears to be a clear political dimension to many of the representations we received in relation to this area. Such issues are outside the remit of the Assembly, and will potentially set the terms for our deliberations. Instead, in our re-evaluation of our draft recommendations, we have concentrated on the evidence provided during Stage Three.

In electoral terms, the combination of Greenwich with Lewisham and Bexley with Bromley would provide a better balance than the alternative pairings. While the difference between the two combinations is relatively small – between 2 and 3 per cent in each of the electoral areas – it is notable that the pairing of Greenwich with Bexley and Bromley with Lewisham would produce electoral seats with the greatest degree of variance from the average in London (at 11 per cent fewer and 12 per cent more than average respectively). As we stated in our draft recommendations, while we do not rule out options which would provide a poorer level of electoral equality, we would need to be persuaded that they had significant other benefits.
small section of both boroughs should necessarily determine the electoral areas for the whole of South East London. Nor are we persuaded that we should have regard to the relatively small number of transport links between Bexley and Bromley. Submissions have cited that Bexley and Greenwich share a Chamber of Commerce and Health Authority, are both members of the Thames Gateway London Partnership, the South London Business Partnership and the South London Business Training & Enterprise Council (SOLOTEC), and are partners in the regeneration of Thamesmead, and that service areas such as Plumstead Police Division serve parts of both boroughs. Bexley and Bromley, on the other hand, share only membership of SOLOTEC. However, as pointed out at Stage One by Lewisham, it also has stronger strategic links with Greenwich than Bromley. It is argued that its links tended to be with Southwark and Greenwich. In particular, it argued that it shared Inner London status and Millennium-based partnerships with Greenwich.

99 The importance of these links between boroughs should not be overstated, however. At Stage One of the review, the Metropolitan Police considered that the boundaries of electoral areas would have little practical effect on their services. Also, as outlined in Greenwich's submission, the boundaries of police divisions will change shortly under review with them with the boundaries of London boroughs. The North and South Thames Regional Offices of the NHS Executive noted that most of the electoral areas would not accord with the current health authority boundaries in London, and that it was important not to overstate the significance of the electoral areas. Its view was that most liaison and partnership working would continue to be between health authorities and the boroughs themselves, and that greater emphasis should be placed upon the similarities and disparities in economic and deprivation factors in formulating electoral areas. While there may be significant strategic links between Bromley and Bexley, equally we have received no evidence of significant strategic links between Bromley and Lewisham. In relation to Greenwich, there would appear to be evidence to suggest that on balance it shares more significant strategic links with Bexley than with Lewisham, although it shares links with both.

98 The evidence in relation to transport links is less clear, with contradictory evidence being submitted to us. We have concluded from the evidence presented that there are significant transport links between Greenwich and its neighbours Lewisham and Bexley, but there are fewer links between Bexley and Bromley. While the A20 trunk road acts as a boundary between the two boroughs, it is crossed by the A22 and A224. We stated in our draft recommendations that where there are fewer or no transport links, such as between Havering and Bexley, the case for adjoining boroughs being combined is less strong. While we recognise that there are fewer transport links between Bexley and Bromley than between Bexley and Greenwich, we do not consider that the A20 acts as a significant physical division between the boroughs in the same way as the River Lee and River Thames act as barriers. We therefore do not believe the A20 issue should be given too much weight in our consideration of the electoral areas for South East London.

98 We have concluded that, on balance, we should confirm our draft recommendation to combine Bexley with Bromley and Greenwich with Lewisham. We are persuaded that this arrangement would provide better electoral equality and would reflect the similar nature of the local authorities concerned. We also note that of the four boroughs concerned, only Greenwich has argued against our draft recommendations. We also note that Lewisham and Bromley supported their pairing with Bexley and Greenwich respectively at Stage One. We are persuaded that both would have regard to transport links in an area which is relatively accessible by both public transport and car, and do not consider that the benefits of unifying these boroughs would determine the structure of electoral areas in South East London. We recognise that there are significant strategic links between Greenwich and Bexley, but note that Greenwich also shares links with Lewisham. While we recognise that Bexley does not have significant links with Bromley, we consider that this could equally apply to the links between Bromley and Lewisham. This being the case, while we stress the evidence put to us about strategic links, we should not overlook the arguments put to us in relation to electoral equality and similarity.

Names of Electoral Areas

98 As part of this exercise, we were also required to recommend names for the 14 electoral areas. In our Guidance we outlined a number of possible alternative approaches. We suggested that the names of electoral areas could be based upon compass points, borough names or geographical features or that alternatively they could be numbered from 1 to 14.

98 At Stage One, most respondents either did not comment on suitable names for electoral areas, or restricted themselves to the most appropriate names for a limited number of electoral areas. The Labour Party preferred numbering seats, while the Conservative Party and the London Pride Partnership preferred the use of compass points. The preference of the Green Party, among others, was the use of geographical features for names, while others preferred the use of the boroughs’ former administrative counties in names, such as Middlesex and Kent.

98 We considered that there was a danger when naming new electoral areas that we would create names that have no local resonance and are confusing to electors. In our draft recommendations we therefore decided that we should attempt to provide a simple, understandable system of names for the new electoral areas. We considered that while compass points do not extend the scope of possibilities, they provide an unambiguously descriptive title that could be used on electoral area. We would consider the use of compass points or geographical locations.

98 Our approach was broadly welcomed at Stage Two. However, two respondents, the Labour Party and the North and South Thames Regional Offices of the NHS Executive, argued for consistent use of borough names in electoral area titles. Both agreed that our approach might cause some confusion to electors.

98 We received most comments referring to the suitability of names in circumstances where we had departed from the use of borough names in electoral area titles. For the proposed ‘London Central’ electoral area (combining Hammersmith & Fulham, Kensington & Chelsea and Westminster), Westminster Council argued that in view of the current European Constituency having the same title, it should be renamed ‘Central London’. However, Kensington & Chelsea preferred the use of the name ‘Central and West London’. One resident suggested the use of ‘London Central West’ and that the neighbouring ‘City & London East’ electoral area be renamed ‘London Central East’. Another resident suggested that the use of ‘London’ in the title of electoral areas was unnecessary and unwieldy.

98 The London boroughs of Hackney and Waltham Forest considered that their electoral area, ‘Islington & Lee’ (combining Islington, Hackney and Waltham Forest), should be renamed. Waltham Forest pointed out that locally it is called the River Lee, and that local residents are unlikely to identify with the name. It suggested ‘London North & East’ would be a suitable alternative. Hackney argued that “the extent of identification and recognition of local people in Hackney in a constituency named ‘Islington & Lee’ will be minimal, particularly when this incorporates the names of an adjoining borough”. It considered that it was unfair for the names of the other two boroughs to be subsumed by Islington in the name of the electoral area. It considered that the compass point system was the most appropriate for the area and that the electoral area should be named ‘North East London’. The North and South Thames Regional Offices of the NHS Executive commented that, as Lee was also a community in Lewisham, its use in an electoral area name could cause confusion.

98 Richmond upon Thames considered that a more creative and accurate name than ‘London South West’ should be devised for the electoral area combining Hounslow, Richmond upon Thames and Kingston upon Thames. It suggested a name referring to Western or Upper Thames. Kingston upon Thames Council pointed out that the name of the electoral area should reflect the names of the constituent boroughs. However, a resident of Hounslow supported the use of the ‘London South West’ name for the area.

98 Wandsworth was the only borough to argue for a departure from using borough titles. It preferred that the electoral area combining Wandsworth and Merton should be named ‘Wandle’ after the local river, the River Wandle, which flows through both boroughs.
We are aware that there has been broad support for our proposals for naming electoral areas, and that names of electoral areas have generally proven uncontentious. We also note this is despite the variety of differing views expressed at Stage One. We have, however, decided to recommend some changes to names of electoral areas on the basis of comments received at Stage Three. In particular, we recognised that as all of the electoral areas are within London, there is no need for their titles to include the ‘London’ prefix. We have therefore renamed our proposed ‘London South West’ electoral area as ‘South West’, the proposed ‘London Central’ electoral area as ‘City & London East’ and the proposed ‘Islington & Lee’ electoral area should be named ‘North East’ respectively.

We have decided not to propose any other changes to electoral area names on the basis that we had not received significant support for change or there was a lack of consensus over alternative names. We also consider that once it has been established, the Greater London Assembly should be able to propose alternative names for its electoral areas.

Final Recommendations

In relation to the 14 electoral areas, we are confirming our draft recommendations as final and these recommendations are detailed and illustrated in Map 1 and Figure 1. We consider that our criteria of seeking electoral equality, while having regard to the similarities of areas and strategic links, have been well received. We continue to consider that we should not combine areas either side of the River Thames, or at the northern extent of the River Lee. We have also concluded that the division of some Parliamentary constituencies between electoral areas is unavoidable, and that while the Assembly will be required to work closely with other elected representatives, limited overlapping of boundaries should not have a significant impact.

We have decided in the light of comment received to modify our recommendations in relation to names of electoral areas so as to both simplify the names and give them better local recognition. We propose to modify the following draft recommendations: the proposed ‘London South West’ electoral area should be named ‘South West’, the proposed ‘London Central’ electoral area should be named ‘West Central’, the proposed ‘City & London East’ should be named ‘City & East’, and the proposed ‘Islington & Lee’ electoral area should be named ‘North East’.

APPENDIX A

The Commission’s Draft Recommendations

Figure 2 details the 1998 electorate for each of the London boroughs. Detailed in Figure 3 are our draft recommendations for the Electoral Areas for the Assembly of the Greater London Authority.

Figure 2:

<table>
<thead>
<tr>
<th>Local authority</th>
<th>Number of electors</th>
<th>Local authority</th>
<th>Number of electors</th>
</tr>
</thead>
<tbody>
<tr>
<td>Barking &amp; Dagenham</td>
<td>113,997</td>
<td>Islington</td>
<td>118,461</td>
</tr>
<tr>
<td>Barnet</td>
<td>227,270</td>
<td>Kensington &amp; Chelsea</td>
<td>102,513</td>
</tr>
<tr>
<td>Besley</td>
<td>167,833</td>
<td>Kingston upon Thames</td>
<td>102,230</td>
</tr>
<tr>
<td>Brent</td>
<td>169,920</td>
<td>Lambeth</td>
<td>185,585</td>
</tr>
<tr>
<td>Bromley</td>
<td>226,273</td>
<td>Lewisham</td>
<td>176,041</td>
</tr>
<tr>
<td>Camden</td>
<td>135,757</td>
<td>Merton</td>
<td>131,861</td>
</tr>
<tr>
<td>Croydon</td>
<td>225,937</td>
<td>Newham</td>
<td>147,369</td>
</tr>
<tr>
<td>Ealing</td>
<td>210,607</td>
<td>Redbridge</td>
<td>175,266</td>
</tr>
<tr>
<td>Enfield</td>
<td>202,395</td>
<td>Richmond upon Thames</td>
<td>125,154</td>
</tr>
<tr>
<td>Greenwich</td>
<td>152,615</td>
<td>Southwark</td>
<td>160,416</td>
</tr>
<tr>
<td>Hackney</td>
<td>119,680</td>
<td>Sutton</td>
<td>132,194</td>
</tr>
<tr>
<td>Hammersmith &amp; Fulham</td>
<td>112,096</td>
<td>Tower Hamlets</td>
<td>128,967</td>
</tr>
<tr>
<td>Haringey</td>
<td>145,940</td>
<td>Waltham Forest</td>
<td>157,581</td>
</tr>
<tr>
<td>Harrow</td>
<td>156,334</td>
<td>Wandsworth</td>
<td>199,320</td>
</tr>
<tr>
<td>Haringey</td>
<td>179,865</td>
<td>Westminster</td>
<td>125,391</td>
</tr>
<tr>
<td>Hillingdon</td>
<td>178,732</td>
<td>City of London Corporation</td>
<td>5,167</td>
</tr>
<tr>
<td>Hounslow</td>
<td>156,195</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Source: Office for National Statistics
### APPENDIX B

## Representations received

### Electoral Areas

**London-wide bodies**

1. We received views from 10 London-wide, regional or national bodies on the most appropriate electoral areas for the Greater London Authority.

2. The North and South Thames Regional Offices of the NHS Executive broadly supported our draft recommendations, but pointed out that they generally do not accord with the current health authority boundaries in London. While some health authorities had expressed concern to them about this issue, they considered that this reaction might overstate the significance of the electoral areas for the purposes of NHS liaison within Greater London, which they considered would remain primarily with the boroughs themselves.

3. The Regional Offices did recognise, however, that the Assembly and the Mayor would need to work closely with strategic bodies such as itself. While they recognised the importance of electoral equality, they wished to see greater account taken of common and deprivation factors when assessing similarity between boroughs. They considered that, unless this was taken into account, there would be a risk that the views of the underprivileged would be dominated by others.

4. The London Region of English Heritage stated that it was sceptical over the degree to which the City of London had sufficient common interests with Barking & Dagenham, Newham and Tower Hamlets to warrant its inclusion in an electoral area with those boroughs. It argued that the proposal ignored the poverty and deprivation of the East London boroughs and "the international importance of the City of London as a world financial centre, its obvious synergies with other central London Boroughs such as the City of Westminster, and its high-level specialist business functions". In planning terms, it commented that the City is a key component in the strategic planning and transportation policies of Central London, while it is excluded from the Thames Gateway Regional Planning Area which includes all riparian East London boroughs.

5. The London & South Region of the Commission for Racial Equality recognised that the Commission faced a difficult task in reconciling the views of different interests and its own criteria. It commented that as its own task was to promote equality of opportunity and good relations between people of different races, it had an interest in ensuring that the Assembly's electoral areas were such that the interests of ethnic minorities would be fairly represented. It considered that this would be best achieved by combining boroughs with higher numbers of ethnic minorities, so as to ensure that their voices were heard. In this regard, it was concerned about our proposal to combine...
Hounslow with Kingston and Richmond boroughs. The Commission argued that this proposal to include Hounslow, which has a high ethnic population, with two boroughs which have low ethnic populations. It suggested that we should consider combining Hounslow with Hillingdon, Brent with Harrow and Ealing with Hammersmith & Fulham.

6 London Transport considered that the public transport circumanences of inner and outer London differed, and that it would be important that the new Assembly recognized this. It argued that the avoidance of views on transport issues there was a powerful case for an arrangement which combined inner and outer London boroughs. It therefore argued that there was a case for combining Bexley with Greenwich and Bromley with Lewisham. It also considered there was a compelling case for a strong voice for central London transport issues on the Assembly, and was concerned that our draft recommendations would fragment the area between electoral areas.

7 The Greater London Group of the Royal Institution of Chartered Surveyors agreed in principle with the desire to create electoral areas with a broadly similar electorate, but argued that this should not be an overriding argument in every circumstance. It considered in particular that outer London boroughs should be paired together as well as inner ones, on the grounds that they often display mutual interests and economic links. While it supported our draft recommendations for south of the River Thames, it considered that for reasons of geography and economic relationships Ealing should be combined with Brent, Harrow with Hillingdon, and the City of London with Hammersmith & Fulham, Kensington & Chelsea and Westminster.

8 London Says No, an organisation representing those opposed to the formation of a Greater London Authority, agreed that the site of an electoral area was less relevant than its make-up and natural borders. It agreed that similar communities should be kept together wherever possible, and argued that this meant inner and outer London boroughs should remain separate. It said that our draft recommendations were in accordance with the option to which it had “least objections”. However, it maintained that Barnet and Brent should be combined, and that Camden has more in common with the City of London, Kensington & Chelsea and Westminster.

9 Three members of the London Fire & Civil Defence Authority, councillors from the boroughs of Bromley, Greenwich and Bexley with Greenwich would provide better accountability for fire and emergency planning services, on the grounds that such a combination would more closely match the areas covered by fire stations in the area and reflect the common interest in relation to the various industrial properties and sites in the Bexley and Thameside area. The English Sports Council expressed its support for the view “that electoral equality should be the most important consideration when constructing the electoral areas”.

Political parties

10 We received three London-wide submissions from political parties. The Greater London Regional Office of the Labour Party (the Labour Party) said that it was in broad agreement with the approach adopted by the Commission, “including the requirement for broad electoral equality, the preference for combination of boroughs with a community of interest and the inclusion of the Upper Lee Valley and River Thames east of the City of London as barriers which should be respected”. However, it emphasised that there was a need to balance electoral parity with accessibility to the electorate and administrative convenience. It was concerned that we had attached so little importance to the existing representational patterns or to the convenience of local authorities and political parties.

11 The Labour Party was in full agreement with our draft recommendations for North and East London which, it argued, would form robust, well-shaped constituencies. However, in West London, it reiterated its preference for Hammersmith & Fulham to be combined with Ealing, and for Hounslow to be combined with Hillingdon. While in South London it supported linking Croydon and Merton, it was “seriously concerned” at the draft recommendations for South East London. In particular, it argued that Bexley and Greenwich should form an electoral area on the grounds that they have a long, ill-defined common boundary and numerous transport links, and “as part of the Thames Gateway, an electoral area comprised of these boroughs would reflect the City & London East electoral area north of the river”. It contrasted this with Bexley and Bromley, which it argued are divided by the A20 dual carriageway and have a somewhat shorter common boundary. We also received submissions from seven constituency Labour Parties, six London borough Labour Groups and four individual branches expressing similar views.

12 The London Regional Office of the Conservative Party (the Conservative Party) generally welcomed and supported our draft recommendations, recognising “the very thorough consideration which the Commission has clearly given to the representations made”. However, while it supported our draft recommendations for South London in their entirety, it expressed concern over two particular groupings in North London, namely the electoral areas linking the City with part of East London and our draft recommendations for electoral areas in the vicinity of the Upper River Lee. It considered that the City of London should retain a central focus on the economic life of London and that this would be best achieved by grouping it with Westminster. It argued that the principle of electoral equality, the desirability of grouping similar areas, reflecting the views of the residents and not dividing Parliamentary constituencies all pointed towards the City being linked with Westminster in an electoral area rather than with boroughs to its east. In relation to the Upper Lee Valley, it argued that Lee Valley should override the natural boundary of the River Lee, and that Enfield should be linked with Watfham Forest. We received a further 14 submissions from constituency Conservative parties, 12 from London borough Conservative Groups and one from an individual branch, all expressing similar views.

13 The London Federation of Green Parties (the Green Party) welcomed our draft recommendations. It stated that “in almost all regards, we are pleased with the outcome, feeling that it represents a fair and well-reasoned basis for creating the London Assembly’s electoral constituencies”. It accepted our view that the River Lee poses as significant a physical barrier to residents in North East London as the River Thames does to the Central and East London boroughs. It recognised that, as a result of reflecting this barrier, the three electoral areas of Barnet & Camden, Islington & Lee and Enfield & Haringey would contain a wide diversity of communities, but nevertheless accepted the draft recommendations. However, it reiterated its case for linking Hillingdon with Harrow and Ealing with Brent, arguing that “in both cases there is not an overwhelming geographical reason to create diverse, finger-like constituencies reaching from the Green Belt to the heart of London... and that in both cases the instances of the percentage variance from the average member:elector ratio is smaller than in the Commission’s proposals”.

14 We also received a submission from one Liberal Democrat constituency party, Chingford & Woodford Green, supporting the pairing of Waltham Forest and Redbridge. In addition, Brent & Harrow Co-operative Party supported the combination of Brent and Harrow in an electoral area.

The London boroughs

15 We received responses from 17 of the 33 London boroughs, with most respondents restricting their comments to their own locality. Brent, Enfield, Hackney, Tower Hamlets, Waltham Forest and Wandsworth all supported our draft recommendations for their respective areas. The Corporation of London, while reiterating its neutral stance, was concerned that proper weight should be given to the views expressed by its residents, the majority of those which had expressed a preference had wished to be linked with Westminster in any electoral area.

16 Hounslow stated that it was very disappointed that its preference for combining with Hillingdon had been ignored, commenting that “Hounslow has little or no affinity or relationship” with Richmond upon Thames and Kingston upon Thames. It argued that Heathrow Airport, while in Hillingdon, “has a significant impact on Hounslow and gives rise to a number of planning, transport, economic and environment issues which are of interest and concern to both boroughs, while also acting as an important employment source”. In addition, it argued that while Hounslow and Hillingdon share a similar population mix with a significant incidence of ethnic minority groups, they differ in this respect from Richmond upon Thames and Kingston upon Thames, a factor that “introduces important cultural, economic, social and educational differences” between the areas.

17 Richmond upon Thames considered that our arguments opposing cross-river combinations should equally be applied to combining Richmond with boroughs on either side of the River Thames. It further argued that in terms of population similarity and economic development factors, it should be combined with the boroughs of Kingston upon Thames and Sutton. Kingston upon Thames,
however, stated that its Policy and Resources Committee "did not wish to put forward any formal view on the proposed combination of Kingston, Richmond and Twickenham in a single GLA [Greater London Authority] electoral area".

18. Hammeinersmith & Fulham supported our view that the number other than diverse boroughs should be grouped, but questioned the extent to which this would be achieved by combining it with Westminster and Kensington & Chelsea. It considered that it shared partnerships with other West London boroughs, particularly through the West London Alliance, and that linking the borough with Central London boroughs would damage this work. It added that a link with Ealing would help to reinforce the recently formed Ealing, Acton & Shepherd's Bush Parliamentary constituency. In relation to electoral equality, Hammeinersmith & Fulham argued that "the voting public will be much more concerned to achieve GLA [Greater London Authority] constituencies that help achieve the strategic aims of the new authority, in terms of jobs, transport, and a vibrant capital city, than in arithmetic issues of electoral equality".

19. Westminster, while welcoming its grouping with Hammeinersmith & Fulham and Kensington & Chelsea, argued that it should also be linked with the City of London. Its principal argument was that such a grouping would provide better electoral equality than linking the City with East London, and that as we had stated that this was our most important consideration we should not run counter to it. It argued that the electoral boundaries would be "not be influenced by policy issues such as the regeneration of east London. This is a matter for the GLA [Greater London Authority] as a whole and the Boroughs and is not a valid basis for determining the electoral area and who should represent it". Instead, it argued that we should have greater regard for the commonality between Westminster and the City of London, and the current Parliamentary boundaries which link the two, and reflect the views of residents who prefer such a link. Kensington & Chelsea similarly considered that combining the City of London with boroughs to the east would have an adverse effect on electoral equality and noted that it would divide the City of London & Westminster Parliamentary constituency.

20. Newham, on the other hand, stated that it was pleased that some of the recommendations for its area recognised the "strength of the arguments that the electoral areas for the assembly should support the capacity for strategic thinking and should underpin the achievement of London-wide objectives. We are also pleased that some consultation document recommends that the City should be linked as a key partner with the East London boroughs in support of the eastward focus of regeneration. This view was mirrored by Barking & Dagenham Council, which argued that "the isolation of the City as a member of the group is considered to be of paramount importance as this will give East London supporting strength to achieve their aims".

21. Greenwich argued that its combination with Bexley would form a much more natural electoral area than combining it with Lewisham. It argued that this was most apparent with regard to the development of Thamesmead, which is divided between Greenwich and Bexley, but also because the boroughs are linked through parliamentary constituencies, the Greenwich & Bexley Health Authority, Bexley & Greenwich Chamber of Commerce, the Thames Gateway London Partnership and the South London Business Leadership Partnership. It also noted that while Lewisham was also a partner in the Thames Gateway initiative, it was on the fringe of that Partnership, and that the borough had indicated that it was considering leaving it.

22. Croydon noted that we had decided not to place significant emphasis on strategic transport links, and felt that this "blunts the point" made by the council that the Tramlink project should be a major reason for its grouping with Merton. However, the council refrained from agreeing that there should be linked with Merton on the grounds that it is the most similar neighbouring authority in terms of demographic and service measures and economic, environmental and social profile.

Other representations

23. We received 102 representations from other interested parties during Stage Two. These included representations from five Members of Parliament and two Members of the City of London & Westminster Parliamentary constituency.

24. Stephen Twigg MP (Enfield Southgate) and Andrew Love MP (Edmonton) supported our draft recommendations for the linking of Enfield and Haringey in an electoral area. Stephen Twigg commented that "it makes sense for Enfield and Haringey to be grouped together as there already exists a strong existing pattern of joint work and cooperation between the two". Andrew Dismore MP (Hendon) supported the linking of Barnet and Camden boroughs on the grounds that they have "strategic roles as regional links, and that "these links will generate issues of strategic importance which will become an integral part of the work of the GLA [Greater London Authority]".

25. Clive Efford MP (Eltham) considered that Bexley and Greenwich should be combined in an electoral area. He commented that the two boroughs share a health authority and health facilities and that families from Greenwich move eastwards to Bexley for schooling or if they are moving out of the borough. He also noted that both of the arterial roads serving the Millennium Dome, the A2 and A20, serve both boroughs. John Austin MP (Erith & Thamesmead) argued that we had "paid insufficient attention to the links between the boroughs of Bexley and Greenwich". In particular he cited the development of Thamesmead which straddles the two boroughs' common boundary and is currently undergoing regeneration due to a joint funding bid by Greenwich and Bexley. Mr Austin also commented that the Boundary Commission had acknowledged it was desirable that Thamesmead be incorporated in one Parliamentary Constituency. He considered that the A20 forms a physical barrier between Greenwich and Bexley, and that Bexley and Greenwich share a health authority, a number of health and social service related organisations and an ethnic population from the Indian subcontinent.

26. Shaun Spicers MEP (London South East) also considered that Bexley should be combined with Greenwich, and that Bromley should be combined with Lewisham. He argued that there are significant regeneration links between the boroughs of Bexley and Greenwich, as well as between Greenwich and the Thamesmead Partnership, they share assisted area status for the Thamesmead area and regeneration of the Thamesmead area, and service provision and voluntary organisations links. He stated that these links are also demonstrated in travel to work patterns, which show that almost 17 per cent of the Greenwich workforce is from Bexley. While he conceded that there are good transport links between Greenwich and Haringey, he argued that there are very few links between Bromley and Bexley. He considered that in service such as fire and police there were greater links between Greenwich and Bexley than Greenwich and Lewisham, and that to ensure their accountability these links should be recognised.

27. Richard Balfe MEP (London South Inner) also argued that Lewisham should be paired with Bromley, and that Bexley should be paired with Greenwich. He said that the A2 and the railway line Greenwich and Bexley, and that communities have grown up around these, while the A21 links Lewisham and Bromley, and that a number of communities such as Downham and Crystal Palace in part in both boroughs. He argued that a future review of parliamentary boundaries is more likely to link Lewisham and Bromley than Lewisham and Greenwich.

28. Some respondents argued that the Assembly could help to overcome what they considered to be arbitrary borough boundaries. In particular, there was concern expressed about the division of Thamesmead between electoral areas. Thamesmead Family Service Unit, for example, argued that it already had to liaise with the two authorities, Bexley and Greenwich, when dealing with issues relating to the town. While in recent years joint working between the authorities and the merger of the two health authorities had improved the situation, it argued that the Unit's strategic development would be enhanced by its inclusion in one authority. Canos Chris Byers, the Anglican Rector of Thamesmead, responding on behalf of all churches in the town, commented that combining Bexley with Bromley would have the effect of dividing Thamesmead into two and would "make it even harder for us as a town that won't bring cohesion and a sense of identity to a community that will eventually number 40,000 people". He welcomed recent changes to health authority and Parliamentary boundaries but argued that there was a need to combine both parts of the town in one borough.

29. Finsbury Park Area Joint Working Party and the Finsbury Park Action Group argued that it was important for Finsbury Park to be combined within one electoral area so that the area had one Assembly representative. It argued that Haringey shares many more characteristics with Hackney and Islington than it does with Enfield, and that the barrier effect created by the Upper Lee Valley has been exaggerated. It said the Lee Valley was crossed by two railway lines and the Victoria Line. If the Lee Valley is considered as a physical barrier,
it argued that we are then obliged to combine diverse areas such as Islington with Waltham Forest and Camden with Barnet.

10 Some submissions gave weight to strategic transport links in the formulation of electoral areas. In particular, in West London, many residents referred to the A40 and London Underground links in their support for linking Ealing and Hillingdon boroughs. A number of Blackheath residents argued that Lewisham and Greenwich should be paired together as they share the A2 trunk road, rail routes and the Docklands Light Railway extension. Other respondents gave weight to other strategic issues. The SUHIGE community group argued that Camden and Islington share the King’s Cross development and a health authority in addition to a common boundary.

11 Middlesex Probation Service commented on the eight boroughs within its service area. It stated that “the probation service has links with a wide range of bodies whose co-operation is essential if we are to re-educate offenders safely in the community”, and that this work makes the organisation aware of links between London boroughs and communities. It considered that linking Enfield and Haringey in particular made sense as there are a number of service providing organisations which make a similar link. Similarly, it considered that linking Brent and Hounslow would reflect existing co-operation. It also considered that linking Ealing with Hillingdon and Hounslow and Kingston upon Thames with Richmond upon Thames would be reasonable. It had reservations over the linkages between Barnet and Camden, but recognised that this option enabled “the strong pairings” to the east and west of it.

Names of Electoral Areas

12 There were relatively few comments on the most appropriate names for the electoral areas. The Labour Party recognised that there was no obvious solution to the issue of names for electoral areas but argued that, if borough names were to be used, they should be used universally. It argued that partial use of compass points and geographical features could cause some confusion to electors.

13 North and South Thames Regional Office of the NHS Executive argued that we should consistently use the names of constituent boroughs for the names of electoral areas. It said that, while we had done this in the main, there could be confusion where we had not. It cited for example Islington & Lee which, it argued, could be confusing as there is a part of Lewisham borough called Lee.

14 Westminster argued that in view of the current European constituency having the title of ‘London Central’, the electoral area should be named ‘Central London’. However, Kensington & Chelsea said that it was “very anxious to safeguard the residential nature of the Royal Borough and to restrain moves to enlarge the ‘Central London’ designation which could carry with it a lower level of local authority control ... [and] would strongly recommend the Commission to adopt the name ‘Central and West London’”. Wandsworth Council stated that it “strongly recommends that the name ‘Wandle’ be chosen for the Wandsworth/Merton area”.

15 Richmond upon Thames considered that a more creative and accurate name than ‘London South West’ should be devised for its electoral area; it suggested Western or Upper Thames. Kingston upon Thames preferred that the name of the electoral area should reflect the names of the constituent boroughs.

16 Waltham Forest preferred that the electoral area combining the borough with Islington and Hackney should be named ‘London North & East’ rather than ‘Islington & Lee’ which it considered “residents are unlikely to identify with”. Hackney similarly argued that “the extent of identification and recognition of local people in Hackney in a constituency named ‘Islington & Lee’ will be minimal, particularly when this incorporates the name of an adjoining borough but not their own”.

It argued that the compass point system was the most appropriate for the area and that the electoral area should be named ‘North East London’.

17 The Labour Group on Barnet Council supported the use of borough names in the title of its electoral area, arguing that ‘Barnet & Camden’ should be adopted. A resident of Hounslow supported the use of ‘London South West’ for the combination of Hounslow, Richmond upon Thames and Kingston upon Thames. One resident suggested the use of ‘London Central East’ and ‘London Central West’ in preference to the proposed ‘City & London East’ and ‘London Central’ on the basis that he hoped that in future the term the City of London would refer to the whole of the capital. Another preferred the use of ‘East & City’ for the proposed City & London East electoral area, and ‘Lee & Islington’ instead of ‘Islington & Lee’.